



# South Coast Air Quality Management District

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

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## A G E N D A

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### MEETING, SEPTEMBER 7, 2012

A meeting of the South Coast Air Quality Management District Board will be held at 9:00 a.m., in the Auditorium at AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California.

#### Questions About an Agenda Item

- 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 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.

#### Questions About Progress of the Meeting

- During the meeting, the public may call the Clerk of the Board's Office at (909) 396-2500 for the number of the agenda item the Board is currently discussing.

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The agenda and documents in the agenda packet will be made available upon request in appropriate alternative formats to assist persons with a disability. Disability-related accommodations will also be made available to allow participation in the Board meeting. Any accommodations must be requested as soon as practicable. Requests will be accommodated to the extent feasible. Please telephone the Clerk of the Boards Office at (909) 396-2500 from 7:00 a.m. to 5:30 p.m. Tuesday through Friday.

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 the South Coast Air Quality Management District Clerk of the Board's Office, 21865 Copley Drive, Diamond Bar, CA 91765.

The Agenda is subject to revisions. For the latest version of agenda items herein or missing agenda items, check the District's web page ([www.aqmd.gov](http://www.aqmd.gov)) or contact the Clerk of the Board, (909) 396-2500. Copies of revised agendas will also be available at the Board meeting.

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*Cleaning the air that we breathe...™*

## **CALL TO ORDER**

- Pledge of Allegiance
- Opening Comments: William A. Burke, Ed.D., Chair  
Other Board Members  
Barry R. Wallerstein, D. Env., Executive Officer

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Staff/Phone (909) 396-

## **CONSENT CALENDAR (Items 1 through 21)**

Note: Consent Calendar items held for discussion will be moved to Item No. 22

1. Approve Minutes of July 13, 2012 Board Meeting **McDaniel/2500**

### **Budget/Fiscal Impact**

2. Amend Contract for Policy Consultation Regarding Local, State and Federal Transportation Issues **Alatorre/3122**

On January 8, 2010, the Board approved a contract for policy consultation regarding local, state, and federal transportation issues with the Lee Andrews Group. On February 4, 2011, the Board approved the first one-year extension of the existing contract. The contractor has provided valuable services on transportation issues and staff wishes to retain the contractor with an additional year. This action is to approve a final one-year extension of the existing contract, in an amount not to exceed \$100,000 for a one-year period starting September 2012. (Reviewed: Administrative Committee, July 20, 2012; Recommended for Approval)

3. Issue RFP for Legislative Representation in Washington, D.C. **Alatorre/3122**

The current AQMD contracts for legislative representation in Washington, D.C. will expire on December 31, 2012 and January 14, 2013. The AQMD requires representation in Washington, D.C., to ensure that air quality legislation, federal Clean Air Act implementation, subvention funding and special grants, and other related issues are monitored and AQMD viewpoints are presented in an effective and timely manner during the federal legislative and policy-setting process. This action is to issue an RFP for legislative consulting services in Washington D.C. (Reviewed: Legislative Committee, July 20, 2012; Recommended for Approval)

4. **Execute Contract for One-Year TV Partnership** **Atwood/3687**

On May 4, 2012, the Board approved release of an RFP to solicit proposals from local TV stations for a one-year media partnership including daily air quality forecasts. Four proposals were received by the RFP deadline and were evaluated based on the criteria stated in the RFP. The Administrative Committee reviewed this item on July 20, 2012 and recommended executing a contract with KABC-7 for \$145,000 for a one-year media partnership, with an option to renew for two additional one-year contracts. (Reviewed: Administrative Committee, July 20, 2012; Recommended for Approval)

5. **Issue RFP for Replacement of Heating, Ventilation, and Air Conditioning Black Steel Piping at AQMD Headquarters** **Johnson/3018**

At the February 3, 2012 meeting, the Board approved the issuance of an RFP for replacement of Heating, Ventilation and Air Conditioning (HVAC) black steel piping. In response to the RFP, the three (3) timely-received proposals all exceeded the tentative funds budgeted for this project in the FY 2011-12 Budget. Following receipt of the proposals, staff has identified alternative piping materials which may be lower in cost than traditional copper piping and afford a longer warranty period. Therefore, staff recommends releasing a new RFP soliciting additional proposals providing for the option of using piping materials other than copper. (Reviewed: Administrative Committee, July 20, 2012; Recommended for Approval)

6. **Recognize Funds and Approve Additional Truck Projects under "Year 3" Proposition 1B-Goods Movement Program** **Liu/2105**

CARB has informed the AQMD that additional "Year 3" Proposition 1B-Goods Movement Program funds are available, and up to \$10.5 million of these funds will be allocated to the AQMD for truck projects. These funds will bring the South Coast/Inland Empire corridor's share to 55% of the total program funds as originally approved by CARB Board. Hence, these actions are to recognize up to \$10.5 million in "Year 3" Proposition 1B-Goods Movement Program funds from CARB, and to execute contracts for heavy-duty diesel truck projects until all the project funds of the newly allocated funds, in addition to any "Years 2 & 3" returned and accrued interest funds designated for truck projects are exhausted from the Proposition 1B-Goods Movement Program Fund (81). (No Committee Review)

7. **Authorize Acquisition of Six Advanced Technology Vehicles for AQMD's Alternative Fuel Vehicle Demonstration Program** **Liu/2105**

AQMD tests and demonstrates new vehicles with low- and zero-emission technologies as they become available. This action is to lease two Chevrolet Volt extended-range electric vehicles, two Mercedes F-cell fuel cell vehicles and two Honda Fit electric vehicles. Total cost to the AQMD for these six vehicles will not exceed \$119,000 from the Clean Fuels Fund (31). (Reviewed: Technology Committee, July 27, 2012; Recommended for Approval)

8. **Execute Contract with Legal Counsel to Provide Representation in Employment Litigation Matter** **Wiese/3460**

It has become necessary to retain outside legal counsel to advise and represent the District in an employment-related litigation matter. This action is to authorize the Executive Officer to amend an existing contract with Paul Hastings LLP for a total contract amount not to exceed \$200,000.00. (No Committee Review)
  
9. **Amend Contracts to Provide Short- and Long-Term Systems Development, Maintenance and Support Services** **Marlia/3148**

AQMD currently has contracts with several companies for short- and long-term systems development, maintenance and support services. These contracts are periodically amended to add budgeted funds as additional needs are defined. This action is to amend the contracts approved by the Board to add funding of \$429,200 for needed development and maintenance work. Funds for this purchase are included in the FY 2012-13 Budget. (Reviewed: Administrative Committee, July 20, 2012; Recommended for Approval)
  
10. **Appoint Alternate Engineer Member to AQMD Hearing Board** **McDaniel/2821**

The term of office for the Hearing Board Alternate Engineer Member expired June 30, 2012. The Advisory Committee interviewed candidates at its meeting on March 28, 2012, and made its recommendation to the Administrative Committee. The Administrative Committee interviewed candidates at its meeting on May 11, 2012, and decided not to recommend either of the two candidates interviewed, but to continue the item to a subsequent meeting and interview additional individuals from the pool of qualified engineer member/alternate candidates. This action is to appoint an alternate engineer member to fill the new term. (Reviewed: Administrative Committee, May 11, and July 20, 2012; Recommended for Approval)
  
11. **Approve Contract Awards and Modifications and Fund Transfer for Miscellaneous Costs in FY 2012-13 Approved by MSRC** **Winterbottom**

The MSRC approved multiple new contracts and/or modifications under the FY 2011-12 Work Program. These include awarding new contracts under the Local Government Match, Alternative Fuel Engines for On-Road Heavy Duty Vehicles, Alternative Fuel Infrastructure, Bikeshare, and Rideshare Thursday Public Awareness Programs. Additionally, every year the MSRC adopts an Administrative Budget which includes transference of funds to the AQMD Budget to cover administrative expenses. At this time the MSRC seeks Board approval of these contract awards and the fund transfer. (Reviewed: Mobile Source Air Pollution Reduction Review Committee, August 16, 2012; Recommended for Approval)



**Items 12 through 21 - Information Only/Receive and File**

12. Legislative & Public Affairs Report **Alatorre/3122**
- This report highlights the June and July 2012 outreach activities of Legislative & Public Affairs, which include Environmental Justice Update, Community Events/Public Meetings, Business Assistance, and Outreach to Business and Federal, State and Local Government. (No Committee Review)
13. Hearing Board Report **Camarena/2500**
- This reports the action taken by the Hearing Board during the period of June 1 through July 31, 2012. (No Committee Review)
14. Civil Filings and Civil Penalties Report **Wiese/3460**
- This reports the monthly penalties from June 1 through June 30, 2012, and legal actions filed by the District Prosecutor during June 1 through June 30, 2012. An Index of District Rules is attached with the penalty report. (Reviewed: Stationary Source Committee, July 27, 2012)
15. Lead Agency Projects and Environmental Documents Received by AQMD **Chang/3186**
- This report provides, for the Board's consideration, a listing of CEQA documents received by the AQMD between June 1, 2012 and July 31, 2012, and those projects for which the AQMD is acting as lead agency pursuant to CEQA. (No Committee Review)
16. Rule and Control Measure Forecast **Chang/3186**
- This report highlights AQMD rulemaking activity and public workshops potentially scheduled for the year 2012. (No Committee Review)
17. Report of RFPs and RFQs Scheduled for Release in September **O'Kelly/2828**
- This report summarizes the RFPs and RFQs for budgeted services over \$75,000 scheduled to be released for advertisement for the month of September. (Reviewed: Administrative Committee, July 20, 2012; Recommended for Approval)

18. FY 2011-12 Contract Activity O'Kelly/2828

This report lists the number of contracts let during FY 2011-12, the respective dollar amounts, award type, and the authorized contract signatory for the AQMD. This report includes the data provided in the March 2012 report covering contract activity for the first six months of FY 2011-12. (No Committee Review)

19. Summary of Changes to FY 2011-12 Approved Budget O'Kelly/2828

This is the annual report of budget changes for FY 2011-12. (No Committee Review)

20. Status Report on Major Projects for Information Management Scheduled to Start During First Six Months of FY 2012-13 Marlia/3148

Information Management is responsible for data systems management services in support of all AQMD operations. This action is to provide the monthly status report on major automation contracts and projects to be initiated by Information Management during the first six months of FY 2012-13. (No Committee Review)

21. Zero and Near-Zero Emission Technologies and Energy Quarterly Report of Activities Related to Powering Future Vision Greenwald/2111

This report describes key AQMD staff actions since April 2012 to seek implementation of zero and near-zero emission technologies and energy sources as needed to attain federal air quality standards. (No Committee Review)

22. Items Deferred from Consent Calendar

**BOARD CALENDAR**


23. Administrative Committee (Receive & File) Chair: Burke Wallerstein/3131

24. Legislative Committee Chair: Gonzales Alatorre/3122

Receive and file; and adopt the following position as recommended:

Agenda Item	Recommended Position
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AB 972 (Butler) Oil and Gas; Hydraulic Fracturing: Moratorium	Watch
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25. Mobile Source Committee (Receive & File) **Chair: Loveridge** **Chang/3186**
26. Stationary Source Committee (Receive & File) **Chair: Yates** **Nazemi/2662**
27. Technology Committee (Receive & File) **Chair: Benoit** **Liu/2105**
28. Mobile Source Air Pollution Reduction Review Committee (Receive & File) **Board Liaison: Antonovich** **Hogo/3184**
29. California Air Resources Board Monthly Report (Receive & File) **Board Rep: Loveridge** **McDaniel/2500**
30. California Fuel Cell Partnership Steering Team Meeting Summary and Quarterly Update  **Miyasato/3249**
- This report summarizes the California Fuel Cell Partnership Steering Team meeting held June 12-13, 2012 and provides quarterly update for the period beginning January 2012. (Reviewed: Technology Committee, July 27, 2012; Recommended for Approval)
31. Status Report on Regulation XIII - New Source Review **Nazemi/2662**
- This report presents the federal final determination of equivalency for January 2010 through December 2010. As such, it provides information regarding the status of Regulation XIII – New Source Review in meeting federal NSR requirements and shows that AQMD’s NSR program is in compliance with applicable federal requirements from January 2010 through December 2010. (Reviewed: Stationary Source Committee, July 27, 2012)

## **PUBLIC HEARING**

32. Amend Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines **Tisopulos/3123**  
**(Continued from the July 13, 2012 Board Meeting)**
- Consistent with staff’s Technology Assessment findings, the proposed amendments would re-establish the previously adopted emission limits for biogas-powered internal combustion engines. The proposed amendment would provide additional time for compliance, a compliance option for a longer averaging time for engines with superior performance in achieving lower mass emissions, a compliance option that further extends the effective dates for certain engines based on a compliance flexibility fee, and include other clarifications. This action is to adopt the resolution: 1) Receiving and filing the Technology Assessment Report; 2) Certifying the CEQA Addendum to the 2008 Environmental Assessment; and 3) Amending Rule 1110.2. (Reviewed: Stationary Source Committee, April 20, May 18, and June 15, 2012)

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

**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)**

Wiese/3460

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

- California Communities Against Toxics, et al. v. U.S. EPA, et al., U.S. Court of Appeals, Ninth Circuit, Case No. 11-71127;
- Communities for a Better Environment, California Communities Against Toxics, Desert Citizens Against Pollution, Natural Resources Defense Council, Inc., and Physicians for Social Responsibility-Los Angeles v. U.S. EPA, United States Court of Appeals, Ninth Circuit, Case No. 12-71340;
- Flashberg, et al. v. Dublin, et al., Los Angeles Superior Court Case No. BC463159;
- Physicians For Social Responsibility, et al. v. U.S. EPA, U.S. District Court, Central, Case No. 11-5885;
- Physicians for Social Responsibility, et al. v. U.S. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 12-70016; and
- Physicians for Social Responsibility, et al. v. U.S. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 12-70079.

It is also necessary for the Board to recess to closed session under Government Code section 54956.9(c) to consider initiation of litigation (two cases) and to confer with legal counsel regarding a significant exposure to litigation against the agency pursuant to subdivision (b) of Government Code section 54956.9 (one potential case).

In addition, it is also necessary for the Board to recess to closed session pursuant to Government Code section 54957.6 to confer regarding upcoming labor negotiations with:

- designated representatives regarding represented employee salaries and benefits or other mandatory subjects within the scope of representation [Negotiator: William Johnson; Represented Employees: SCAQMD Professional Employees Association].

**ADJOURNMENT**

**\*\*\*PUBLIC COMMENTS\*\*\***

Members of the public are afforded an opportunity to speak on any listed item before or during consideration of that item. Please notify the Clerk of the Board, (909) 396-2500, if you wish to do so. All agendas are posted at AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California, at least 72 hours in advance of the meeting. At the end of the agenda, an opportunity is also provided for the public to speak on any subject within the AQMD's authority. Speakers may be limited to three (3) minutes each.

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 Public Comments 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, provided 25 copies are presented to the Clerk of the Board. Electronic submittals to [cob@aqmd.gov](mailto:cob@aqmd.gov) of 10 pages or less including attachment, in MS WORD, plain or HTML format will also be accepted by the Board and made part of the record if received no later than 5:00 p.m., on the Tuesday prior to the Board meeting.

**ACRONYMS**

AQIP = Air Quality Investment Program	NESHAPS = National Emission Standards for Hazardous Air Pollutants
AVR = Average Vehicle Ridership	NGV = Natural Gas Vehicle
BACT = Best Available Control Technology	NO <sub>x</sub> = Oxides of Nitrogen
Cal/EPA = California Environmental Protection Agency	NSPS = New Source Performance Standards
CARB = California Air Resources Board	NSR = New Source Review
CEMS = Continuous Emissions Monitoring Systems	PAMS = Photochemical Assessment Monitoring Stations
CEC = California Energy Commission	PAR = Proposed Amended Rule
CEQA = California Environmental Quality Act	PHEV = Plug-In Hybrid Electric Vehicle
CE-CERT =College of Engineering-Center for Environmental Research and Technology	PM <sub>10</sub> = Particulate Matter ≤ 10 microns
CNG = Compressed Natural Gas	PM <sub>2.5</sub> = Particulate Matter ≤ 2.5 microns
CO = Carbon Monoxide	PR = Proposed Rule
CTG = Control Techniques Guideline	RFP = Request for Proposals
DOE = Department of Energy	RFQ = Request for Quotations
EV = Electric Vehicle	SCAG = Southern California Association of Governments
FY = Fiscal Year	SIP = State Implementation Plan
GHG = Greenhouse Gas	SO <sub>x</sub> = Oxides of Sulfur
HRA = Health Risk Assessment	SOON = Surplus Off-Road Opt-In for NO <sub>x</sub>
IAIC = Interagency AQMP Implementation Committee	SULEV = Super Ultra Low Emission Vehicle
LEV = Low Emission Vehicle	TCM = Transportation Control Measure
LNG = Liquefied Natural Gas	ULEV = Ultra Low Emission Vehicle
MATES = Multiple Air Toxics Exposure Study	U.S. EPA = United States Environmental Protection Agency
MOU = Memorandum of Understanding	VOC = Volatile Organic Compound
MSERCs = Mobile Source Emission Reduction Credits	ZEV = Zero Emission Vehicle
MSRC = Mobile Source (Air Pollution Reduction) Review Committee	
NATTS =National Air Toxics Trends Station	

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BOARD MEETING DATE: September 7, 2012

AGENDA NO. 1

MINUTES: Governing Board Monthly Meeting

SYNOPSIS: Attached are the Minutes of the July 13, 2012 meeting.

**RECOMMENDED ACTION:**

Approve Minutes of the July 13, 2012 Board Meeting.

Sandra McDaniel,  
Clerk of the Boards

SM:dp

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**FRIDAY, JULY 13, 2012**

Notice having been duly given, the regular meeting of the South Coast Air Quality Management District Board was held at District Headquarters, 21865 Copley Drive, Diamond Bar, California. Members present:

William A. Burke, Ed.D., Chairman  
Speaker of the Assembly Appointee

Mayor Dennis R. Yates, Vice Chairman  
Cities of San Bernardino County

Supervisor Michael D. Antonovich (arrived at 9:20 a.m. and left at 10:25 a.m.)  
County of Los Angeles

Supervisor John J. Benoit  
County of Riverside

Mayor Michael A. Cacciotti  
Cities of Los Angeles County – Eastern Region

Supervisor Josie Gonzales  
County of San Bernardino

Dr. Joseph K. Lyou  
Governor's Appointee

Clark E. Parker  
Senate Rules Committee Appointee

Councilmember Jan Perry (arrived at 9:30 a.m.)  
City of Los Angeles

Mayor Miguel A. Pulido (left at 9:30 a.m.)  
Cities of Orange County

**Members Absent:**

Mayor Ronald O. Loveridge  
Cities of Riverside County

Councilmember Judith Mitchell  
Cities of Los Angeles County – Western Region

Supervisor Shawn Nelson  
County of Orange

**CALL TO ORDER:** Chairman Burke called the meeting to order at 9:10 a.m.

- Pledge of Allegiance: Led by Dr. Parker.
- Opening Comments

Chairman Burke. Recognized the students participating in the summer internship program as well as interns from Clean Energy.

- Presentation to Outgoing Hearing Board Member Alternate Steve Zikman

Chairman Burke presented a plaque to Steve Zikman in recognition and appreciation of 3 years of service as Attorney Member Alternate on the AQMD Hearing Board.

### **CONSENT CALENDAR**

1. Approve Minutes of June 1, 2012 Board Meeting

#### ***Budget/Fiscal Impact***

2. Authorize Purchase of PeopleSoft and Oracle Software Support
3. Authorize Purchase of OnBase Software Support
4. Execute Contract with South Bay Cities Council of Governments for Demonstration of Battery Electric Vehicles **E**
5. Execute Contract to Cosponsor Steam Hydrogasification Reaction Demonstration Project **E**
6. Recognize Revenue and Appropriate Funds for NATTS; Recognize Revenue and Reimburse Undesignated Fund Balance with PM2.5 Grant Award; Recognize Revenue, Appropriate and Reallocate Funds for PAMS; and Issue Purchase Order
7. Issue Program Announcement for Low-Emission Leaf Blower Vendors



8. Authorize Executive Officer to Loan Monies from General Fund and/or Special Revenue Funds to Provide Cash Flow for Accrued Interest Earned, but Not Yet Received, in Other Special Revenue Funds
9. Authorize Funding for Air Quality and Clean Technology Conference for Senior Citizens
10. Approve Contract Awards and Modifications Approved by MSRC

**Items 11 through 17 - Information Only/Receive and File**

11. Legislative & Public Affairs Report
12. Hearing Board Report
13. Civil Filings and Civil Penalties Report
14. Lead Agency Projects and Environmental Documents Received by AQMD
15. Rule and Control Measure Forecast
16. Report of RFPs and RFQs Scheduled for Release in July
17. Report on Major Projects for Information Management Scheduled to Start During First Six Months of FY 2012-13
18. Items Deferred from Consent Calendar – none.

**BOARD CALENDAR**

19. Administrative Committee
20. Legislative Committee
21. Mobile Source Committee
22. Stationary Source Committee

23. Technology Committee

24. Mobile Source Air Pollution Reduction Review Committee

Dr. Lyou announced his abstention on Item No. 10 because Southern California Gas Company and Disney Worldwide Services are potential sources of income to him.

MOVED BY YATES, DULY SECONDED, AGENDA ITEMS 1 THROUGH 17, 19, AND 21 THROUGH 24 APPROVED AS RECOMMENDED BY THE FOLLOWING VOTE:

AYES: Benoit, Burke, Cacciotti, Gonzales, Lyou (except *Item #10*), Parker, Pulido and Yates.

NOES: None.

ABSTAIN: Lyou (*Item #10 only*).

ABSENT: Antonovich, Loveridge, Mitchell, Nelson and Perry.

20. Legislative Committee

Dr. Lyou moved that an amendment to the recommendation for AB 1532 be made to include toxic emissions.

(Supervisor Antonovich arrived at 9:20 a.m.)

MOVED BY LYOU, SECONDED BY CACCIOTTI, AGENDA ITEM 20 APPROVED AS RECOMMENDED, RECEIVING AND FILING THE LEGISLATIVE COMMITTEE REPORT AND ADOPTING THE POSITIONS ON LEGISLATION WITH THE MODIFICATION AS SET FORTH BELOW, BY THE FOLLOWING VOTE:

AYES: Antonovich, Benoit, Burke, Cacciotti, Gonzales (except as to *AB 1570 & SB984*), Lyou, Parker, Pulido and Yates.

NOES: None.

ABSTAIN: Gonzales (*as to AB 1570 & SB 984 only*).

ABSENT: Loveridge, Mitchell, Nelson and Perry.

Modification to the recommendation on AB 1532 (Perez) as stated on page 5 of the board letter:

*“...It is recommended that the bill be amended to enhance priority for projects with co-benefits that reduce criteria **and/or toxic** pollutant emissions in nonattainment areas.”*

<b>Agenda Item</b>	<b>Recommended Position</b>
AB 1570 (Perea) & SB 984 (Simitian): Environmental Quality: California Environmental Quality Act: Record of Proceedings	Oppose Unless Amended
AB 1532 (Perez) California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Account	Support With Amendments
SB 1268 (Pavley) Energy: Energy Conservation Assistance	Support

25. California Air Resources Board Monthly Report

MOVED BY LYOU, SECONDED BY CACCIOTTI,  
THE BOARD APPROVED AGENDA ITEM 25 AS  
RECOMMENDED, RECEIVING AND FILING THE  
CARB REPORT, BY THE FOLLOWING VOTE:

AYES: Antonovich, Benoit, Burke, Cacciotti,  
Gonzales, Lyou, Parker, Pulido and  
Yates.

NOES: None.

ABSENT: Loveridge, Mitchell, Nelson and Perry.

**Staff Presentation/Board Discussion**

26. Update on 2012 Air Quality Management Plan

Dr. Elaine Chang, DEO/Planning, Rule Development and Area Sources, introduced the item explaining the key elements of the 2012 AQMP including attainment of the 24-hour PM<sub>2.5</sub> standard and 2023 ozone requirements. She

explained that other pertinent topics include near-roadway exposure, ultrafine particles and energy concerns.

(Councilwoman Perry arrived at 9:30 a.m. and Mayor Pulido left at 9:30 a.m.)

In response to Dr. Parker's inquiry about ultrafine particles, Dr. Wallerstein noted that ultrafine particles are measured by the number of particles rather than their weight due to their small size. The report highlights the need for further investigation of different technology to reduce not only the total weight of particles coming out of a tail pipe or a stack, but also the number of particles.

Dr. Lyou stressed the importance of the timely notice of workshops and events related to the AQMP so that a more diverse audience can be targeted to be engaged in the process.

Henry Hogo, Assistant DEO of Science and Technology Advancement, presented the Board with information regarding the vision document that sets the framework for improved air quality and climate planning, the result of collaboration between the SCAQMD, CARB and the San Joaquin Valley Air Pollution Control District. He highlighted the key sectors addressed including passenger transport, freight movement, off-road, agriculture and energy.

The following individuals addressed the Board on this item.

ALEX HALL, UCLA

Presented the Board with information about a comprehensive study of climate change in the Los Angeles region that may impact long term planning for air quality issues. The results of the study, which used global climate simulations to find warming patterns, indicated that the region will see increased warming throughout the 21<sup>st</sup> century, especially in inland areas. He noted that the study focused on invisible, GHG emissions that do not impact public health directly, but which change the planet's energy balance and lead to a change in climate, and that the District may be interested in further study that would include particulate matter pollution.

(Supervisor Antonovich left at 10:25 a.m.)

Dr. Lyou asked if Dr. Hall could provide staff with the basis for the analysis so that they can use that data and incorporate it into the District's modeling.

Dr. Hall confirmed that the information could be provided to the District and commented that a follow-up study that incorporates the combination of chemical reactions that define the air quality in the region would be prudent.

Dr. Wallerstein noted that the portions of the draft AQMP related to addressing local air quality problems with ozone, particulate and air toxics, are

almost the same steps that need to be taken to address climate change and the District can help combat the effects by doing its fair share and encouraging aggressive policies.

Dr. Lyou commented that it would be helpful to incorporate into the vision document these results and any subsequent results that give insight into how climate change impacts ozone.

JONATHAN PARFREY, Climate Resolve

Explained that the study performed by Dr. Hall is the cutting edge of climate science and makes clear that additional adaptation measures need to be taken in Southern California. He noted that concerns other than ozone formation by additional warming include the additional energy generation needs, a decrease in soil moisture leading to increased dust, droughts and potentially wild fires; and encouraged AQMD to work with UCLA and his organization to get the information to the public.

Dr. Wallerstein commented that staff looks forward to the public's comments and participation throughout the process, before the final 2012 AQMP is brought before the Board in the fall.

RECEIVED AND FILED; NO ACTION NECESSARY.

**PUBLIC HEARING**

27. Amend Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines

Staff recommended that the public hearing on this item be continued to the September 7, 2012 Board Meeting.

MOVED BY GONZALES, SECONDED BY LYOU,  
AND UNANIMOUSLY CARRIED (Absent:  
Antonovich, Loveridge, Mitchell, Nelson and Pulido)  
THE PUBLIC HEARING ON RULE 1110.2 WAS  
CONTINUED TO THE SEPTEMBER 7, 2012 BOARD  
MEETING.

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

There was no public comment on non-agenda items.

**CLOSED SESSION**

The Board recessed to closed session at 10:50 a.m., pursuant to:

- (1) Government Code section 54956.9(a) to confer with its counsel regarding pending litigation which has been initiated formally and to which the District is a party, as follows:
  - American Coatings Association v. South Coast Air Quality Management District, California Supreme Court Case No. S177823; and
  - W. M. Barr & Company, Inc. v. SCAQMD, California Court of Appeal Case No. B233892.
- (2) Government Code section 54956.9(c) to consider initiation of litigation (one case).

Following closed session, General Counsel Kurt Wiese announced that a report of any reportable actions taken in closed session will be filed with the Clerk of the Board and made available upon request.

**ADJOURNMENT**

There being no further business, the meeting was adjourned by Kurt Wiese at 11:30 a.m.

The foregoing is a true statement of the proceedings held by the South Coast Air Quality Management District Board on July 13, 2012.

Respectfully Submitted,

Denise Pupo  
Senior Deputy Clerk

Date Minutes Approved: \_\_\_\_\_

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Dr. William A. Burke, Chairman

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## ACRONYMS

AQMP = Air Quality Management Plan

CARB = California Air Resources Board

FY = Fiscal Year

GHG = Greenhouse Gas

MSRC = Mobile Source (Air Pollution Reduction) Review Committee

NATTS = National Air Toxics Trends Station

PAMS = Photochemical Assessment Monitoring Stations

PM<sub>2.5</sub> = Particulate Matter ≤ 2.5 microns

RFP = Request for Proposals

RFQ = Request for Quotations

U.S. EPA = United States Environmental Protection Agency

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 2

**SYNOPSIS:** On January 8, 2010, the Board approved a contract for policy consultation regarding local, state, and federal transportation issues with the Lee Andrews Group. On February 4, 2011, the Board approved the first one-year extension of the existing contract. The contractor has provided valuable services on transportation issues and staff wishes to retain the contractor with an additional year. This action is to approve a final one-year extension of the existing contract, in an amount not to exceed \$100,000 for a one-year period starting September 2012.

**COMMITTEE:** Administrative, July 20, 2012, Recommended for Approval

**RECOMMENDED ACTION:**

Authorize the Chairman to approve a final one-year extension of the contract with Lee Andrews Group in an amount not to exceed \$100,000 for a one-year period.

Barry R. Wallerstein, D.Env.  
Executive Officer

DJA:MC:JNS

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**Background**

In 2008, the Board directed staff to participate in the development of the next federal surface transportation reauthorization legislation in order to maximize emissions reductions from the transportation sector. Throughout the ensuing period, in fulfillment of the Board's directive, staff has actively participated in a wide array of strategic development discussions with fellow stakeholders and key policymaking officials at local, state and federal levels.

Recognizing the importance of reducing emissions from the transportation sector, the Board in January 2010 authorized the services of a consultant selected through an RFP process to assist staff in outreach efforts related to this important transportation



legislation. The Board subsequently approved the first one-year extension of the contract with the Lee Andrews Group for continued services in February 2011, which was extended under the Executive Officer's contracting authority through September 2012. The contractor has worked with staff in reaching out to key stakeholders and decision-makers, prepared materials and briefings, conducted research, and initiated the formation of partnerships to support clean air issues in Washington, D.C. These efforts have contributed to developing and building relationships with individuals and organizations that continue to bring attention to AQMD's priorities and projects in California and Washington D.C. These efforts are critical to strengthen policies at the local, state and federal levels that will assist AQMD in achieving its goals for reducing criteria pollutants and toxics in the South Coast basin.

As part of these education, outreach, and policy development efforts, the contractor planned, organized, and secured speakers for the Regional Air Quality and Transportation Conference held in October 2011 in Los Angeles as well as the Powering the Future: Moving to Cleaner Transportation and Energy Technologies held in Washington D.C. in June 2012. These events were very successful and attended by many, including the Mayor of Los Angeles, members of Congress, and other key policymakers and community leaders.

Significant progress was made in incorporating clean air policies in the federal surface transportation reauthorization legislation. These efforts must continue through 2012 and 2013 to ensure these air quality policies move forward to implementation at the federal, state and local level. Efforts by the contractor to expand relationships with stakeholders is a key component of our strategy.

### **Proposal**

This multi-year effort should be continued so as not to lose momentum. While staff is knowledgeable about the transportation funding process and has access to federal advocates, it is necessary to continue to engage with individuals, organizations, and coalitions at the local, state and federal levels across the nation who will play significant roles in the implementation of the surface transportation reauthorization bill and also help to address other transportation and goods-movement related mobile source emissions. This effort will also include outreach and education regarding the 2012 Air Quality Management Plan (AQMP), which will focus on reducing air pollution from mobile sources engaged in transportation activities, including goods movement.

The contractor's work will include continued outreach and coalition building in support of clean air policies in the federal surface transportation bill and its implementation at the state and local level. At minimum, these efforts will include assisting with the planning and implementing of advocacy efforts, including symposiums and conferences; assisting AQMD to secure increased federal and state action needed to reduce mobile source emissions from marine vessels, locomotives, and other goods

movement related activities; assisting with the continued development of partnerships; assisting AQMD in conducting outreach to and obtaining support from local, state and federal decision-makers for the development and deployment of advanced clean energy and transportation technologies; and advancing public-private partnerships as a means to address air pollution from the transportation and goods movement sectors. In addition, the contractor will assist AQMD regarding engaging elected officials, individuals, organizations and other key stakeholders in the 2012 AQMP.

Staff recommends amending the existing contract with Lee Andrews Group to extend the contract by one year at a cost not to exceed \$100,000.

**Resource Impacts**

Sufficient funds are included in Legislative & Public Affairs' FY 2012-13 Budget.

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 3

PROPOSAL: Issue RFP for Legislative Representation in Washington, DC

SYNOPSIS: The current AQMD contracts for legislative representation in Washington, D.C., will expire on December 31, 2012 and January 14, 2013. The AQMD requires representation in Washington, DC, to ensure that air quality legislation, federal Clean Air Act implementation, subvention funding and special grants, and other related issues are monitored and AQMD viewpoints are presented in an effective and timely manner during the federal legislative and policy-setting process. This action is to issue an RFP for legislative consulting services in Washington D.C.

COMMITTEE: Legislative, July 20, 2012; Recommended for Approval

**RECOMMENDED ACTION:**

Approve the issuance and release of RFP #P2013-05 to solicit proposals for legislative representation in Washington, D.C. at a cost not to exceed \$225,500.

Barry R. Wallerstein, D.Env.  
Executive Officer

DJA:WS:RAR

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**Background**

The AQMD, as one of the largest air quality regulatory agencies in the United States and a leader in air quality innovations, is an important contributor to the national policymaking debate. To help ensure that AQMD's input continues to be conveyed in a timely and meaningful manner and that AQMD is involved in policy development relating to air quality legislation, federal Clean Air Act implementation, subvention funding and special grants, and other related issues are monitored and AQMD viewpoints are presented in an effective and timely manner during the federal legislative and policy-setting process. Therefore, it is appropriate to continue direct representation and advocacy of AQMD's policy positions on environmental issues in Washington,

D.C. The current contracts for legislative representation in Washington D.C. expire on December 31, 2012 and January 14, 2013.

The 2013 legislative goals and objectives in Washington, D.C. may be broadly divided into four categories: working closely with the federal government to have U.S. EPA clean up mobile sources which are primarily under their jurisdiction; policy advocacy to modernize the federal offset requirements under the Clean Air Act; pursuing appropriation requests or other funding opportunities to support clean technology advancement and ambient monitoring programs; and policy advocacy to further the pursuit of clean air objectives and climate change initiatives at the federal level.

While much of this effort represents a continuation of current policies, an ongoing presence in Washington, D.C. is essential for the achievement of meaningful progress. The 2013 legislative goals and objectives for AQMD will be further refined and presented to the Board's Legislative Committee and the full Board for approval later in the year, as determined by the course of events during the remainder of 2012. However, as of now, the legislative priorities are expected to include the following:

***Clean Air Act Section 185***

Seek clarification, as necessary, to address potential inequities regarding Clean Air Act Section 185 fees for major stationary sources operating in areas that fail to attain the National Ambient Air Quality Standards for Ozone by stipulated deadlines, including alternative fee equivalent programs under U.S. EPA's guidance.

***New Source Review Offsets***

Work with congressional and federal agency staff and other stakeholders to modernize federal New Source Review offset requirements for areas where supply of offsets is inadequate, while furthering the pursuit of clean air objectives.

***Surface Transportation***

Work with Congress, the White House, federal, state and local agencies, business, environmental and community groups, and other stakeholders to:

- Protect and/or expand clean air funding opportunities under the Surface Transportation Reauthorization legislation (successor legislation to MAP-21, which is due to expire in 2014) and other legislation for energy, water, commerce, goods movement, and related areas;
- Enhance provisions of the Surface Transportation Reauthorization legislation to promote clean air and economic growth, particularly with respect to the interaction between transportation and energy issues, and provide for a greater role for air agencies in transportation planning and programming, consistent with Board policy.

### ***Reduction of Toxic Emissions***

Work with Congressional and federal agency staff, including the U.S. DOE, DOT, DOD, and U.S. EPA, to protect existing funding and/or expand Diesel Emission Reduction Act (DERA) funding for the South Coast region, and to pursue other legislative or administrative means to reduce toxic emissions.

### ***Technology Advancement***

Seek and expand funding opportunities for advanced technologies and clean air programs, including through legislative or administrative processes, budget considerations, and stimulus funding opportunities for:

- Zero and near-zero emission technologies;
- Clean energy sources;
- Implementation of AQMD's 2012 Air Quality Management Plan (AQMP);
- Implementation of AQMD's Clean Communities Plan (CCP);
- Environmental justice initiatives; and
- Clean technologies, including clean fuels and vehicles research, development, demonstration and deployment.

### ***Marine Vessels***

Pursue legislative and/or administrative processes to reduce marine vessel emissions, through regulatory and/or incentive based policies in order to facilitate attainment of federal clean air standards by statutory deadlines within the South Coast region.

### ***Locomotives***

Pursue legislative and/or administrative processes to reduce locomotive emissions, through regulatory and/or incentive based policies, in order to facilitate attainment of federal clean air standards by statutory deadlines within the South Coast region.

### ***AQMP***

Support legislation to ensure implementation of the 2012 AQMP, as needed.

### ***Clean Air Act Sections 103 & 105***

Protect AQMD's permitting and enforcement authority and enhance AQMD's subvention funding under Clean Air Act Section 103 and 105 programs.

### ***Environmental Justice***

Support legislation or administrative action to promote environmental justice initiatives, to reduce localized health risks, to develop clean air technology that directly benefits disproportionately impacted communities, and to enhance community participation in decision-making.

### **Proposal**

AQMD seeks the service(s) of contractor(s) to support the Board's goals and objectives for 2013 in Washington D.C. The selected firm(s) will be expected to provide a variety of services, consistent with Board direction. Funding for the initial year shall be up to a maximum amount of \$225,500. The contract may include an option for two additional renewals, contingent on satisfactory performance and approval of subsequent budgets, at Board's discretion.

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

Notice of the RFP will be e-mailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at AQMD's website (<http://www.aqmd.gov> where it can be viewed by making menu selections "Inside AQMD"/"Employment and Business Opportunities"/"Business Opportunities" or by going directly to <http://www.aqmd.gov/rfp/index.html>). Information is also available on AQMD's bidder's 24-hour telephone message line (909) 396-2724.

### **Resource Impacts**

Funding for the base year is contained in the Legislative & Public Affairs FY 2012-13 Professional & Special Services Account. Funding for the two optional one-year extensions is contingent upon Board approval of the Budget for the respective fiscal years.

### **Attachment**

RFP #P2013-05

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
**REQUEST FOR PROPOSALS**  
**FOR LEGISLATIVE REPRESENTATION IN WASHINGTON, D.C.**

#P2013-05

The South Coast Air Quality Management District (AQMD) requests proposals for the following purpose according to terms and conditions attached. In the preparation of this Request for Proposals (RFP) the words "Proposer," "Contractor," and "Consultant" are used interchangeably.

**PURPOSE**

The AQMD requires representation in Washington, DC, to ensure that air quality legislation, federal Clean Air Act implementation, subvention funding and special grants, and other related issues are monitored and AQMD viewpoints are presented in an effective and timely manner during the federal legislative and policy-setting process.

The intent of this RFP is to contract with outside representative(s) knowledgeable in air quality-related issues to provide assistance with and representation of AQMD policy positions and funding needs before the Congress, the White House and federal agencies. Consultant(s) shall be reimbursed on a monthly basis for services rendered at an agreed upon Flat Monthly Fee and actual costs incurred for out-of-pocket expenses.

The selected firm(s) will be expected to provide a variety of services, to be outlined in the work statement, and consistent with AQMD Board directions. Funding for the initial year shall be up to a maximum of \$225,500. The contract may include options for two annual renewals, contingent on satisfactory performance and approval of subsequent budgets, upon approval of the AQMD Governing Board.

**INDEX - The following are contained in this RFP:**

Section I	Background/Information
Section II	Contact Person
Section III	Schedule of Events
Section IV	Participation in the Procurement Process
Section V	Statement of Work/Schedule of Deliverables
Section VI	Required Qualifications
Section VII	Proposal Submittal Requirements
Section VIII	Proposal Submission
Section IX	Proposal Evaluation/Contractor Selection Criteria
Section X	Funding
Section XI	Draft Contract

Attachment A - Certifications and Representations

## **SECTION I: BACKGROUND/INFORMATION**

With the current level of activity in Congress, by the Administration and at federal agencies on air-quality-related issues, and the large portion of federally regulated sources of pollution at issue in the South Coast region, it is imperative that AQMD maintain a strong presence in Washington, DC. Thus, AQMD seeks a contractual agreement with consultant(s) in accordance with the requirements of this Request for Proposal (RFP).

The 2013 legislative goals and objectives in Washington, D.C. may be broadly divided into four categories: working closely with the federal government to have U.S. EPA clean up mobile sources which are primarily under their jurisdiction; policy advocacy to modernize the federal offset requirements under the Clean Air Act; pursuing appropriation requests or other funding opportunities to support clean technology advancement and ambient monitoring programs; and policy advocacy to further the pursuit of clean air objectives and climate change initiatives at the federal level.

While much of this effort represents a continuation of current policies, an ongoing presence in Washington, D.C. is essential for the achievement of meaningful progress. The 2013 legislative goals and objectives for AQMD will be further refined and presented to the Board's Legislative Committee and the full Board for approval later in the year, as determined by the course of events during the remainder of 2012. However, as of now, the legislative priorities are expected to include the following:

### ***Clean Air Act Section 185***

Seek clarification, as necessary, to address potential inequities regarding Clean Air Act Section 185 fees for major stationary sources operating in areas that fail to attain the National Ambient Air Quality Standards for Ozone by stipulated deadlines, including alternative fee equivalent programs under EPA's guidance.

### ***New Source Review Offsets***

Work with congressional and federal agency staff and other stakeholders to modernize federal New Source Review offset requirements for areas where supply of offsets is inadequate, while furthering the pursuit of clean air objectives.

### ***Surface Transportation***

Work with Congress, the White House, federal, state and local agencies, business, environmental and community groups, and other stakeholders to:

- Protect and/or expand clean air funding opportunities under the Surface Transportation Reauthorization legislation (successor legislation to MAP-21, which is due to expire in 2014) and other legislation for energy, water, commerce, goods movement, and related areas;
- Enhance provisions of the Surface Transportation Reauthorization legislation to promote clean air and economic growth, particularly with respect to the interaction between transportation and energy issues, and provide for a greater role for air agencies in transportation planning and programming, consistent with Board policy.



### ***Reduction of Toxic Emissions***

Work with Congressional and federal agency staff, including the U.S. DOE, DOT, DOD, and EPA, to protect existing funding and/or expand Diesel Emission Reduction Act (DERA) funding for the South Coast region, and to pursue other legislative or administrative means to reduce toxic emissions.

### ***Technology Advancement***

Seek and expand funding opportunities for advanced technologies and clean air programs, including through legislative or administrative processes, budget considerations, and stimulus funding opportunities for:

- Zero and near-zero emission technologies;
- Clean energy sources;
- Implementation of AQMD's 2012 Air Quality Management Plan (AQMP);
- Implementation of AQMD's Clean Communities Plan (CCP);
- Environmental justice initiatives; and
- Clean technologies, including clean fuels and vehicles research, development, demonstration and deployment.

### ***Marine Vessels***

Pursue legislative and/or administrative processes to reduce marine vessel emissions, through regulatory and/or incentive based policies in order to facilitate attainment of federal clean air standards by statutory deadlines within the South Coast region.

### ***Locomotives***

Pursue legislative and/or administrative processes to reduce locomotive emissions, through regulatory and/or incentive based policies, in order to facilitate attainment of federal clean air standards by statutory deadlines within the South Coast region.

### ***AQMP***

Support legislation to ensure implementation of the 2012 AQMP, as needed.

### ***Clean Air Act Sections 103 & 105***

Protect AQMD's permitting and enforcement authority and enhance AQMD's subvention funding under Clean Air Act Section 103 and 105 programs.

### ***Environmental Justice***

Support legislation to promote environmental justice initiatives, to reduce localized health risks, to develop clean air technology that directly benefits disproportionately impacted communities, and to enhance community participation in decision-making.

**SECTION II: CONTACT PERSON:**

Questions regarding the content or intent of this RFP or on procedural matters should be addressed to:

Ricardo A. Rivera  
SCAQMD  
Legislative and Public Affairs  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-3069

**SECTION III: SCHEDULE OF EVENTS**

September 7, 2012	RFP Released
October 23, 2012	Proposals Due – <b>No Later Than 1:00 pm</b>
October 23-30, 2012	Proposal Evaluations
November 9, 2012	Interviews, if required*
December 7, 2012	Governing Board Approval
January 8, 2013	Anticipated Contract Execution

*\*The selection process may include an in-person interview in Diamond Bar, CA or a telephone interview with AQMD's Legislative Committee on November 9, 2012.*

**SECTION IV: PARTICIPATION IN THE PROCUREMENT PROCESS**

A. It is the policy of the South Coast Air Quality Management District to ensure that all businesses including minority business enterprises, women business enterprises, disabled veteran business enterprises and small businesses have a fair and equitable opportunity to compete for and participate in AQMD contracts.

B. Definitions:

The definition of minority or women business enterprise set forth below is included for purposes of determining compliance with the affirmative steps requirement described in Paragraph F below on procurements funded in whole or in part with EPA grant funds which involve the use of subcontractors. The definition provided for disabled veteran business enterprise, local business, small business enterprise, low-emission vehicle business and off-peak hours delivery business are provided for purposes of determining eligibility for point or cost considerations in the evaluation process.

1. "Minority-or-women business enterprise" as used in this policy means a business enterprise that meets all the following criteria:

- a. a business that is at least 51 percent owned by one or more minority persons or women, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more minority persons or women.
- b. a business whose management and daily business operations are controlled by one or more minority persons or women.

- c. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.
- 2."Minority person" for purposes of this policy, means a Black American, Hispanic American, Native American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian American (including a person whose origins are from India, Pakistan, and Bangladesh), Asian-Pacific American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, and Taiwan).
- 3."Disabled veteran" as used in this policy is a United States military, naval, or air service veteran with at least 10 percent service-connected disability who is a resident of California.
- 4."Disabled veteran business enterprise" as used in this policy means a business enterprise that meets all of the following criteria:
  - a. is a sole proprietorship or partnership of which is at least 51 percent owned by one or more disabled veterans or, in the case of a publicly owned business, at least 51 percent of its stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
  - b. the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.
  - c. is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.
- 5."Local business" as used in the Procurement Policy and Procedure means a company that has an ongoing business within the boundaries of the South Coast AQMD at the time of bid application and performs 90% of the work related to the contract within the boundaries of the AQMD and satisfies the requirements of Paragraph I below.
- 6."Small business" as used in this policy means a business that meets the following criteria:
  - a. 1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:

<ul style="list-style-type: none"><li>• A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or</li></ul>
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    - A manufacturer with 100 or fewer employees.

- b. Manufacturer means a business that is both of the following:
  - 1) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
  - 2) Classified between Codes 311000 and 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.
- 7. "Joint ventures" as defined in this policy pertaining to certification means that one party to the joint venture is a DVBE or a small business and owns at least 51 percent of the joint venture.
- 8. "Low-Emission Vehicle Business" as used in this policy means a company or contractor that uses low-emission vehicles in conducting deliveries to the AQMD. Low-emission vehicles include vehicles powered by electric, compressed natural gas (CNG), liquefied natural gas (LNG), liquefied petroleum gas (LPG), ethanol, methanol, hydrogen and diesel retrofitted with particulate matter (PM) traps.
- 9. "Off-Peak Hours Delivery Business" as used in this policy means a company or contractor that commits to conducting deliveries to the AQMD during off-peak traffic hours defined as between 10:00 a.m. and 3:00 p.m.
- c. Under Request for Quotations (RFQ), DVBEs, DVBE business joint ventures, small businesses, and small business joint ventures shall be granted a preference in an amount equal to 5% of the lowest cost responsive bid. Low-Emission Vehicle Businesses shall be granted a preference in an amount equal to 5 percent of the lowest cost responsive bid. Off-Peak Hours Delivery Businesses shall be granted a preference in an amount equal to 2 percent of the lowest cost responsive bid. Local businesses (if the procurement is not funded in whole or in part by EPA grant funds) shall be granted a preference in an amount equal to 2% of the lowest cost responsive bid.
- D. Under Request for Proposals, DVBEs, DVBE joint ventures, small businesses, and small business joint ventures shall be awarded ten (10) points in the evaluation process. A non-DVBE or large business shall receive seven (7) points for subcontracting at least twenty-five (25%) of the total contract value to a DVBE and/or small business. Low-Emission Vehicle Businesses shall be awarded five (5) points in the evaluation process. On procurements which are not funded in whole or in part by EPA grant funds local businesses shall receive five (5) points. Off-Peak Hours Delivery Businesses shall be awarded two (2) points in the evaluation process.
- E. AQMD will ensure that discrimination in the award and performance of contracts does not occur on the basis of race, color, sex, national origin, marital status, sexual preference, creed, ancestry, medical condition, or retaliation for having filed a discrimination complaint in the performance of AQMD contractual obligations.
- F. AQMD requires Contractor to be in compliance with all state and federal laws and regulations with respect to its employees throughout the term of any awarded contract, including state minimum wage laws and OSHA requirements.
- G. When contracts are funded in whole or in part by EPA grant funds and if subcontracts are to be let, the Contractor must comply with the steps listed below, which demonstrate a good faith effort to solicit minority and women owned enterprises. Contractor shall submit

a certification signed by an authorized official affirming compliance with the steps below at the time of proposal submission. The AQMD reserves the right to request documentation demonstrating compliance with these steps prior to contract execution.

1. Place qualified small-and-minority businesses and women's business enterprises on solicitation lists;
  2. Ensure that small-and-minority businesses, and women's business enterprises are solicited whenever they are potential sources including advertising at least ten days in advance of the bid in a variety of media directed to minority-and women-owned business audiences;
  3. Divide total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small-and-minority business, and women's business enterprises;
  4. Establish delivery schedules, where requirements permit, which encourage participation by small-and-minority business, and women's business enterprises; and
  5. Use the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
- H. To the extent that any conflict exists between this policy and any requirements imposed by federal and state law relating to participation in a contract by a certified MBE/WBE/DVBE as a condition of receipt of federal or state funds, the federal or state requirements shall prevail.
- I. When contracts are not funded in whole or in part by EPA grant funds, a local business preference will be awarded. For such contracts that involve the purchase of commercial off-the-shelf products, local business preference will be given to suppliers or distributors of commercial off-the-shelf products who maintain an ongoing business within the geographical boundaries of the AQMD. However, if the subject matter of the RFP or RFQ calls for the fabrication or manufacture of custom products, only companies performing 90% of the manufacturing or fabrication effort within the geographical boundaries of the AQMD shall be entitled to the local business preference.
- J. In compliance with federal fair share requirements set forth in 40 CFR 35.6580, the AQMD shall establish a fair share goal annually for expenditures covered by its procurement policy.

## **SECTION V: STATEMENT OF WORK/SCHEDULE OF DELIVERABLES**

### **A. Statement of Work**

Under the direction of the AQMD Executive Officer or Deputy Executive Officer/Legislative & Public Affairs, and, as appropriate, in coordination with AQMD's staff, the Consultant(s) will gather information, provide advice and assistance, and/or advocate positions on legislative/regulatory matters in Washington, DC, on behalf of AQMD as it directly pertains to air quality-related issues, energy and climate issues, transportation issues, and the federal Clean Air Act.

The selected Consultant(s) will perform services on legislative/regulatory matters, including but not necessarily limited to the following:

1. Preparation of a strategic plan for the upcoming legislative year by no later than January 31, 2013, to ensure maximizing AQMD Board and staff participation and involvement, with an emphasis on increasing federal air quality program funding for the South Coast Air Basin; protecting the legal authorities of AQMD; and reducing emissions from federally-controlled mobile sources;
2. Securing the support of AQMD's mission and positions by the decision-makers in the legislative and administrative bodies of the United States government;
3. Advising AQMD on federal issues as requested or as deemed necessary;
4. Advocating positions as directed by AQMD, on all identified and/or drafted legislation and administrative and other policy proposals; providing testimony at committee and other special hearings; and providing written communications to legislators, key administrative officials, and other staff regarding such bills;
5. Assisting in the development of AQMD positions on identified air quality-related federal legislative proposals;
6. Producing materials destined for strategic distribution or inclusion in AQMD legislative committee/Board proceedings;
7. Reviewing and providing editorial and technical revisions and quality control for legislative materials destined for distribution or inclusion in AQMD legislative committee/Board proceedings;
8. Aiding AQMD in making appropriate contact as it participates directly in federal legislative negotiations, including securing additional federal funds for AQMD's clean air programs and activities;
9. Advising/assisting AQMD in presentation of requests to U.S. EPA or other federal agencies on policy matters impacting AQMD operations or its ability to meet the federal clean air standards;
10. Coordination of meetings for AQMD Board members and their executive or legislative staff with federal legislators and/or officials, as well as gathering proper briefing materials for each meeting;
11. Attending and participating in meetings exclusively on behalf of AQMD with legislative representatives and administration members and appointees.
12. Assisting with the development of a national stakeholder network and/or coalition to help facilitate national support for AQMD policy and funding priorities
13. Assisting with coordination, as needed, with any AQMD conferences, forums, symposia, and/or briefings (including AQMD Air Quality Institute briefings) which are held in Washington, DC.

B. Schedule of Deliverables

1. A written strategic and tactical implementation plan for 2013;
2. Written and/or oral communications to AQMD, in a timely manner, on federal legislation or policy matters having a potential to affect AQMD objectives;
3. Written analyses on federal legislation having a potential to affect air quality objectives;
4. Oral and/or written reports on federal legislative/policy meetings attended or monitored on behalf of AQMD;
5. Oral and/or written briefings to AQMD Legislative Committee and/or Governing Board on federal legislation or policy, as determined by AQMD. These briefings may take place in person, by teleconference, or in writing;

6. Oral and/or written recommendations regarding AQMD positions on, and strategies for, federal air quality-related legislation or policies within 30 days of the request by AQMD;
7. Oral and/or written recommendations regarding ways to increase federal appropriations or other funding opportunities for clean air efforts in the Southern California region;
8. Written communications to legislators and key administrative officials conveying AQMD positions on various bills and administrative actions;
9. Preparing and presenting testimony before Congressional committees and/or federal agency hearings;
10. Attending and participating in meetings exclusively on behalf of AQMD with legislative representatives and administration members and appointees;
11. Negotiating bill language, policies or other federal agency provisions related to environmental, transportation or air quality issues;
12. A weekly written briefing covering pertinent administrative/legislative activities;
13. Written quarterly reports, a year-end report, and a year-end presentation delineating and summarizing relevant administrative and legislative actions;
14. An original signed confidentiality agreement;
15. Maintaining records from which the correctness of all written records and filings can be verified. These records are to be open to inspection by AQMD or its representatives during normal business hours.

## **SECTION VI: REQUIRED QUALIFICATIONS**

- A. Persons or firms proposing to bid on this proposal must be qualified and experienced in representing and advising governmental agencies and must submit qualifications demonstrating extensive experience and expertise in the following areas:
  1. Political and legislative analysis of the federal Clean Air Act.
  2. Preparing policy positions on environmental and air quality issues.
  3. Legislative monitoring and bill tracking.
  4. Congressional appropriations process.
  5. Preparing and presenting testimony before Congressional committees and/or federal agency hearings.
  6. Negotiating bill language, policies or other federal agency provisions related to environmental, transportation or air quality issues.
  7. Ability to work proactively and productively with all political affiliations and points of view.
  8. Demonstrated ability in successfully seeking and securing funding for represented clients.
- B. Proposer must submit the following:
  1. Resumes or similar statement of qualifications of person or persons who may be designated as lead attorney for Hearing Board projects.
  2. List of representative clients.

3. Summary of proposer's general qualifications to meet required qualifications and fulfill statement of work, including additional firm personnel and resources beyond those of the designated lead attorney.

## **SECTION VII: PROPOSAL SUBMITTAL REQUIREMENTS**

Submitted proposals must follow the format outlined below and all requested information must be supplied. Failure to submit proposals in the required format will result in elimination from proposal evaluation.

Each proposal must be submitted in three separate volumes:

- Volume I - Technical Proposal
- Volume II - Cost Proposal
- Volume III - Certifications and Representations included in Attachment A to this RFP, should be executed by an authorized official of the Contractor.

A separate cover letter including the name, address, and telephone number of the contractor, and signed by the person or persons authorized to represent the firm should accompany the proposal submission. Firm contact information as follows should also be included in the cover letter:

1. Address and telephone number of office in, or nearest to, Diamond Bar, California.
2. Name and title of firm's representative designated as contact.

A separate Table of Contents should be provided for Volumes I and II.

### **VOLUME I - TECHNICAL PROPOSAL**

#### **DO NOT INCLUDE ANY COST INFORMATION IN THE TECHNICAL VOLUME**

Summary (Section A) - State overall approach to meeting the objectives and satisfying the scope of work to be performed, the sequence of activities, and a description of methodology or techniques to be used.

Program Schedule (Section B) - Provide projected milestones or benchmarks for submitting reports within the total time allowed.

Project Organization (Section C) - Describe the proposed management structure, program monitoring procedures, and organization of the proposed team.

Qualifications (Section D) - Describe the technical capabilities of the firm. Provide references of other similar studies performed during the last five years demonstrating ability to successfully complete the project. Include contact name, title, and telephone number for any references listed. Provide a statement of your firm's background and experience in performing similar projects for other governmental organizations.

Assigned Personnel (Section E) - Provide the following information on the staff to be assigned to this project:



1. List all key personnel assigned to the project by level and name. Provide a resume or similar statement of the qualifications of the lead person and all persons assigned to the project. Substitution of project manager or lead personnel will not be permitted without prior written approval of AQMD.
2. Provide a spreadsheet of the labor hours proposed for each labor category at the task level.
3. Provide a statement indicating whether or not 90% of the work will be performed within the geographical boundaries of the AQMD.
4. Provide a statement of the education and training program provided by, or required of, the staff identified for participation in the project, particularly with reference to management consulting, governmental practices and procedures, and technical matters.
5. Provide a summary of your firm's general qualifications to meet required qualifications and fulfill statement of work, including additional firm personnel and resources beyond those who may be assigned to the project.

Subcontractors (Section F) - This project may require expertise in multiple technical areas. List any subcontractors that may be used and the work to be performed by them.

Conflict of Interest (Section G) - Address possible conflicts of interest with other clients affected by actions performed by the firm on behalf of AQMD. Although the Proposer will not be automatically disqualified by reason of work performed for such firms, AQMD reserves the right to consider the nature and extent of such work in evaluating the proposal.

Additional Data (Section H) - Provide other essential data that may assist in the evaluation of this proposal.

## **VOLUME II - COST PROPOSAL**

Name and Address - The Cost Proposal must list the name and complete address of the Proposer in the upper left-hand corner.

Cost Proposal – AQMD anticipates awarding a fixed price contract. Cost information must be provided as listed below:

1. Detail must be provided by the following categories:
  - A. Labor - List the total number of hours and the hourly billing rate for each level of professional staff. A breakdown of the proposed billing rates must identify the direct labor rate, overhead rate and amount, fringe benefit rate and amount, General and Administrative rate and amount, and proposed profit or fee. Provide a basis of estimate justifying the proposed labor hours and proposed labor mix.
  - B. Subcontractor Costs - List subcontractor costs and identify subcontractors by name. Itemize subcontractor charges per hour or per day.
  - C. Travel Costs - Indicate amount of travel cost and basis of estimate to include trip destination, purpose of trip, length of trip, airline fare or mileage expense, per diem costs, lodging and car rental.

- D. Other Direct Costs -This category may include such items as postage and mailing expense, printing and reproduction costs, etc. Provide a basis of estimate for these costs.

### **VOLUME III - CERTIFICATIONS AND REPRESENTATIONS** (see Attachment A to this RFP)

**{CERTIFICATIONS AND REPRESENTATIONS MUST BE INCLUDED IN YOUR RFP}**

#### **SECTION VIII: PROPOSAL SUBMISSION**

All proposals must be submitted according to specifications set forth in the section above. Failure to adhere to these specifications may be cause for rejection of proposal.

Signature - All proposals should be signed by an authorized representative of the Proposer.

Due Date - The Proposer shall submit **four (4)** complete copies of the proposal in a sealed envelope, plainly marked in the upper left-hand corner with the name and address of the Proposer and the words "Request for Proposals #201X-XX." **All proposals are due no later than 1:00 p.m., August 28, 2012, and should be directed to:**

Procurement Unit  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-3520

**Late bids/proposals will not be accepted under any circumstances.** Any correction or resubmission done by the Proposer will not extend the submittal due date.

Grounds for Rejection - A proposal may be immediately rejected if:

- It is not prepared in the format described, or
- It is signed by an individual not authorized to represent the firm.

Disposition of Proposals - AQMD reserves the right to reject any or all proposals. All responses become the property of AQMD. One copy of the proposal shall be retained for AQMD files. Additional copies and materials will be returned only if requested and at the proposer's expense.

Modification or Withdrawal - Once submitted, proposals cannot be altered without the prior written consent of AQMD. All proposals shall constitute firm offers and may not be withdrawn for a period of ninety (90) days following the last day to accept proposals.

#### **SECTION IX: PROPOSAL EVALUATION/CONTRACTOR SELECTION CRITERIA**

- A. Proposals will be evaluated by a panel of three to five AQMD staff members familiar with the subject matter of the project. The panel shall be appointed by the Executive Officer or his designee. In addition, the evaluation panel may include such outside public sector or academic community expertise as deemed desirable by the Executive Officer. The panel will make a recommendation to the Executive Officer and/or the Governing Board of the AQMD for final selection of a contractor and negotiation of a contract.

B. Each member of the evaluation panel shall be accorded equal weight in his or her rating of proposals. The evaluation panel members shall evaluate the proposals according to the specified criteria and numerical weightings set forth below:

1. R&D Projects Requiring Technical or Scientific Expertise, or Special Projects Requiring Unique Knowledge or Abilities

Understanding the Problem	20
Technical/Management Approach	20
Contractor Qualifications	20
Previous Experience on Similar Projects	10
Cost	<u>30</u>
TOTAL	100

Additional Points

Small Business or Small Business Joint Venture	10
DVBE or DVBE Joint Venture	10
Use of DVBE or Small Business Subcontractors	7
Low-Emission Vehicle Business	5
Local Business (Non-EPA Funded Projects Only)	5
Off-Peak Hours Delivery Business	2

The cumulative points awarded for small business, DVBE, use of small business or DVBE subcontractors, low-emission vehicle business, local business, and off-peak hours delivery business shall not exceed 15 points.

**Note: The award of these additional points shall be contingent upon Proposer completing the Self-Certification section of Attachment A – Certifications and Representations and/or inclusion of a statement in the proposal self-certifying that Proposer qualifies for additional points as detailed above.**

2. To receive additional points in the evaluation process for the categories of Small Business or Small Business Joint Venture, DVBE or DVBE Joint Venture or Local Business (for non-EPA funded projects), the proposer must submit a self-certification or certification from the State of California Office of Small Business Certification and Resources at the time of proposal submission certifying that the proposer meets the requirements set forth in Section III. To receive points for the use of DVBE and/or Small Business subcontractors, at least 25 percent of the total contract value must be subcontracted to DVBEs

and/or Small Businesses. To receive points as a Low-Emission Vehicle Business, the proposer must demonstrate to the Executive Officer, or designee, that supplies and materials delivered to the AQMD are delivered in vehicles that operate on either clean-fuels or if powered by diesel fuel, that the vehicles have particulate traps installed. To receive points as an Off-Peak Hours Delivery Business, the proposer must submit, at proposal submission, certification of its commitment to delivering supplies and materials to AQMD between the hours of 10:00 a.m. and 3:00 p.m. The cumulative points awarded for small business, DVBE, use of Small Business or DVBE Subcontractors, Local Business, Low-Emission Vehicle Business and Off-Peak Hour Delivery Business shall not exceed 15 points.

The Procurement Section will be responsible for monitoring compliance of suppliers awarded purchase orders based upon use of low-emission vehicles or off-peak traffic hour delivery commitments through the use of vendor logs which will identify the contractor awarded the incentive. The purchase order shall incorporate terms which obligate the supplier to deliver materials in low-emission vehicles or deliver during off-peak traffic hours. The Receiving department will monitor those qualified supplier deliveries to ensure compliance to the purchase order requirements. Suppliers in non-compliance will be subject to a two percent of total purchase order value penalty. The Procurement Manager will adjudicate any disputes regarding either low-emission vehicle or off-peak hour deliveries.

3. For procurement of Research and Development (R & D) projects or projects requiring technical or scientific expertise or special projects requiring unique knowledge and abilities, technical factors including past experience shall be weighted at 70 points and cost shall be weighted at 30 points. A proposal must receive at least 56 out of 70 points on R & D projects and projects requiring technical or scientific expertise or special projects requiring unique knowledge and abilities, in order to be deemed qualified for award.
  4. The lowest cost proposal will be awarded the maximum cost points available and all other cost proposals will receive points on a prorated basis. For example if the lowest cost proposal is \$1,000 and the maximum points available are 30 points, this proposal would receive the full 30 points. If the next lowest cost proposal is \$1,100 it would receive 27 points reflecting the fact that it is 10% higher than the lowest cost (90% of 30 points = 27 points).
- C. During the selection process the evaluation panel may wish to interview some proposers for clarification purposes only. No new material will be permitted at this time.
- D. The Executive Officer or Governing Board may award the contract to a proposer other than the proposer receiving the highest rating in the event the Governing Board determines that another proposer from among those technically qualified would provide the best value to AQMD considering cost and technical factors. The determination shall be based solely on the Evaluation Criteria contained in the Request for Proposal (RFP), on evidence provided in the proposal and on any other evidence provided during the bid review process. Evidence provided during the bid

review process is limited to clarification by the Proposer of information presented in his/her proposal.

- E. Selection will be made based on the above-described criteria and rating factors. The selection will be made by and is subject to Executive Officer or Governing Board approval. Proposers may be notified of the results by letter.
- F. The Governing Board has approved a Bid Protest Procedure which provides a process for a bidder or prospective bidder to submit a written protest to the AQMD Procurement Manager in recognition of two types of protests: Protest Regarding Solicitation and Protest Regarding Award of a Contract. Copies of the Bid Protest Policy can be secured through a request to the AQMD Procurement Department.
- G. The Executive Officer or Governing Board may award contracts to more than one proposer if in (his or their) sole judgment the purposes of the (contract or award) would best be served by selecting multiple proposers.
- H. If additional funds become available, the Executive Officer or Governing Board may increase the amount awarded. The Executive Officer or Governing Board may also select additional proposers for a grant or contract if additional funds become available.
- I. Upon mutual agreement of the parties of any resultant contract from this RFP, the original contract term may be extended.

## **SECTION X: FUNDING**

The total funding for the work contemplated by this RFP will be a maximum \$225,500 for the base year with an option to renew the contract for two additional one-year extensions. The funding for the base year is available in the Legislative & Public Affairs FY 2012-13 Professional & Special Services account. Funding for the two one-year extensions is contingent upon Board approval of the Budget for the respective fiscal years.

**SECTION XI: DRAFT CONTRACT (Provided as a sample only)**



# South Coast Air Quality Management District

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

=  
This Contract consists of \*\*\* pages.

1. PARTIES - The parties to this Contract are the South Coast Air Quality Management District (referred to here as "AQMD") whose address is 21865 Copley Drive, Diamond Bar, California 91765-4178, and \*\*\* (referred to here as "CONTRACTOR") whose address is \*\*\*.
2. RECITALS
  - A. AQMD is the local agency with primary responsibility for regulating stationary source air pollution in the South Coast Air Basin in the State of California. AQMD is authorized to enter into this Contract under California Health and Safety Code Section 40489. AQMD desires to contract with CONTRACTOR for services described in Attachment 1 - Statement of Work, attached here and made a part here by this reference. CONTRACTOR warrants that it is well-qualified and has the experience to provide such services on the terms set forth here.
  - B. CONTRACTOR is authorized to do business in the State of California and attests that it is in good tax standing with the California Franchise Tax Board.
  - C. All parties to this Contract have had the opportunity to have this Contract reviewed by their attorney.
  - D. CONTRACTOR agrees to obtain the required licenses, permits, and all other appropriate legal authorizations from all applicable federal, state and local jurisdictions and pay all applicable fees.
3. PERFORMANCE REQUIREMENTS
  - A. CONTRACTOR warrants that it holds all necessary and required licenses and permits to provide these services. CONTRACTOR further agrees to immediately notify AQMD in writing of any change in its licensing status.
  - B. CONTRACTOR shall submit reports to AQMD as outlined in Attachment 1 - Statement of Work. All reports shall be submitted in an environmentally friendly format: recycled paper; stapled, not bound; black and white, double-sided print; and no three-ring, spiral, or plastic binders or cardstock covers. AQMD reserves the right to review, comment, and request changes to any report produced as a result of this Contract.
  - C. CONTRACTOR shall perform all tasks set forth in Attachment 1 - Statement of Work, and shall not engage, during the term of this Contract, in any performance of work that is in direct or indirect conflict with duties and responsibilities set forth in Attachment 1 - Statement of Work.
  - D. CONTRACTOR shall be responsible for exercising the degree of skill and care customarily required by accepted professional practices and procedures subject to AQMD's final approval which AQMD will not unreasonably withhold. Any costs incurred due to the failure to meet the foregoing standards, or otherwise defective services which require re-performance, as directed by AQMD, shall be the responsibility of CONTRACTOR. CONTRACTOR's failure to achieve the performance goals and objectives stated in Attachment 1- Statement of Work, is not a basis for requesting re-performance unless work conducted by CONTRACTOR is deemed by AQMD to have failed the foregoing standards of performance.

- E. CONTRACTOR shall post a performance bond in the amount of \*\*\* Dollars (\$\*\*\*) from a surety authorized to issue such bonds within the State. [USE IF REQUIRED]
  - F. AQMD has the right to review the terms and conditions of the performance bond and to request modifications thereto which will ensure that AQMD will be compensated in the event CONTRACTOR fails to perform and also provides AQMD with the opportunity to review the qualifications of the entity designated by the issuer of the performance bond to perform in CONTRACTOR's absence and, if necessary, the right to reject such entity. [USE IF REQUIRED]
  - G. CONTRACTOR shall ensure, through its contracts with any subcontractor(s), that employees and agents performing under this Contract shall abide by the requirements set forth in this clause.
4. TERM - The term of this Contract is from the date of execution by both parties (or insert date) to \*\*\*, unless further extended by amendment of this Contract in writing. No work shall commence until this Contract is fully executed by all parties.
5. TERMINATION
- A. In the event any party fails to comply with any term or condition of this Contract, or fails to provide services in the manner agreed upon by the parties, including, but not limited to, the requirements of Attachment 1 – Statement of Work, this failure shall constitute a breach of this Contract. The non-breaching party shall notify the breaching party that it must cure this breach or provide written notification of its intention to terminate this contract. Notification shall be provided in the manner set forth in **Clause 11**. The non-breaching party reserves all rights under law and equity to enforce this contract and recover damages.
  - B. AQMD reserves the right to terminate this Agreement, in whole or in part, without cause, upon thirty (30) days' written notice. Once such notice has been given, CONTRACTOR shall, except as and to the extent or directed otherwise by AQMD, discontinue any Work being performed under this Agreement and cancel any of CONTRACTOR's orders for materials, facilities, and supplies in connection with such Work, and shall use its best efforts to procure termination of existing subcontracts upon terms satisfactory to AQMD. Thereafter, CONTRACTOR shall perform only such services as may be necessary to preserve and protect any Work already in progress and to dispose of any property as requested by AQMD.
  - C. CONTRACTOR shall be paid in accordance with this Agreement for all work performed before the effective date of termination under Clause 5.B. Before expiration of the thirty (30) days' written notice, CONTRACTOR shall promptly deliver to AQMD all copies of documents and other information and data prepared or developed by CONTRACTOR under this Agreement with the exception of a record copy of such materials, which may be retained by CONTRACTOR.
6. INSURANCE
- A. CONTRACTOR shall furnish evidence to AQMD of workers' compensation insurance for each of its employees, in accordance with either California or other states' applicable statutory requirements prior to commencement of any work on this Contract.
  - B. CONTRACTOR shall furnish evidence to AQMD of general liability insurance with a limit of at least \$1,000,000 per occurrence, and \$2,000,000 in a general aggregate prior to commencement of any work on this Contract. AQMD shall be named as an additional insured on any such liability policy, and thirty (30) days written notice prior to cancellation of any such insurance shall be given by CONTRACTOR to AQMD.
  - C. CONTRACTOR shall furnish evidence to AQMD of automobile liability insurance with limits of at least \$100,000 per person and \$300,000 per accident for bodily injuries, and \$50,000 in property damage, or \$1,000,000 combined single limit for bodily injury or property damage, prior to commencement of any work on this Contract. AQMD shall be named as an additional insured on any such liability policy, and



thirty (30) days written notice prior to cancellation of any such insurance shall be given by CONTRACTOR to AQMD.

- D. CONTRACTOR shall furnish evidence to AQMD of Professional Liability Insurance with an aggregate limit of not less than \$5,000,000. [OPTIONAL FOR PROFESSIONAL SERVICES]
- E. If CONTRACTOR fails to maintain the required insurance coverage set forth above, AQMD reserves the right either to purchase such additional insurance and to deduct the cost thereof from any payments owed to CONTRACTOR or terminate this Contract for breach.
- F. All insurance certificates should be mailed to: AQMD Risk Management, 21865 Copley Drive, Diamond Bar, CA 91765-4178. **The AQMD Contract Number must be included on the face of the certificate.**
- G. CONTRACTOR must provide updates on the insurance coverage throughout the term of the Contract to ensure that there is no break in coverage during the period of contract performance. Failure to provide evidence of current coverage shall be grounds for termination for breach of Contract.

7. INDEMNIFICATION - CONTRACTOR agrees to hold harmless, defend and indemnify AQMD, its officers, employees, agents, representatives, and successors-in-interest against any and all loss, damage, costs, lawsuits, demands, judgments, legal fees, or any other expenses incurred or required to be paid by AQMD, its officers, employees, agents, representatives, or successors-in-interest arising from or related to any injury to persons or damage to property caused directly or indirectly, in whole or in part, by any willful or negligent act or omission of CONTRACTOR, its employees, subcontractors, agents or representatives in the performance of this Contract.

8. CO-FUNDING [USE IF REQUIRED]

- A. CONTRACTOR shall obtain co-funding as follows: \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); and \*\*\*, \*\*\*, Dollars (\$\*\*\*).
- B. If CONTRACTOR fails to obtain co-funding in the amount(s) referenced above, then AQMD reserves the right to renegotiate or terminate this Contract.
- C. CONTRACTOR shall provide co-funding in the amount of \*\*\*, \*\*\*, Dollars (\$\*\*\*) for this project. If CONTRACTOR fails to provide this co-funding, then AQMD reserves the right to renegotiate or terminate this Contract.

9. PAYMENT

[FIXED PRICE]-use this one or the T&M one below.

- A. AQMD shall pay CONTRACTOR a fixed price of \*\*\*, \*\*\*, Dollars (\$\*\*\*) for work performed under this Contract in accordance with Attachment 2 - Payment Schedule, attached here and included here by reference. Payment shall be made by AQMD to CONTRACTOR within thirty (30) days after approval by AQMD of an invoice prepared and furnished by CONTRACTOR showing services performed and referencing tasks and deliverables as shown in Attachment 1 - Statement of Work, and the amount of charge claimed. Each invoice must be prepared in duplicate, on company letterhead, and list AQMD's Contract number, period covered by invoice, and CONTRACTOR's social security number or Employer Identification Number and submitted to: South Coast Air Quality Management District, Attn: \*\*\*.
- B. An amount equal to ten percent (10%) shall be withheld from all charges paid until satisfactory completion and final acceptance of work by AQMD. [OPTIONAL]
- C. AQMD reserves the right to disallow charges when the invoiced services are not performed satisfactorily in AQMD sole judgment.

[T & M]-use this one or the Fixed Price one above.

- A. AQMD shall pay CONTRACTOR a total not to exceed amount of \*\*\*, \*\*\*, Dollars (\$\*\*\*), including any authorized travel-related expenses, for time and materials at rates in accordance with Attachment 2 – Cost Schedule, attached here and included here by this reference. Payment of charges shall be made by



AQMD to CONTRACTOR within thirty (30) days after approval by AQMD of an itemized invoice prepared and furnished by CONTRACTOR referencing line item expenditures as listed in Attachment 2 and the amount of charge claimed. Each invoice must be prepared in duplicate, on company letterhead, and list AQMD's Contract number, period covered by invoice, and CONTRACTOR's social security number or Employer Identification Number and submitted to: South Coast Air Quality Management District, Attn: \*\*\*.

- B. CONTRACTOR shall adhere to total tasks and/or cost elements (cost category) expenditures as listed in Attachment 2. Reallocation of costs between tasks and/or cost category expenditures is permitted up to One Thousand Dollars (\$1,000) upon prior written approval from AQMD. Reallocation of costs in excess of One Thousand Dollars (\$1,000) between tasks and/or cost category expenditures requires an amendment to this Contract.
- C. AQMD's payment of invoices shall be subject to the following limitations and requirements:
  - i) Charges for equipment, material, and supply costs, travel expenses, subcontractors, and other charges, as applicable, must be itemized by CONTRACTOR. Reimbursement for equipment, material, supplies, subcontractors, and other charges shall be made at actual cost. Supporting documentation must be provided for all individual charges (with the exception of direct labor charges provided by CONTRACTOR). AQMD's reimbursement of travel expenses and requirements for supporting documentation are listed below.
  - ii) CONTRACTOR's failure to provide receipts shall be grounds for AQMD's non-reimbursement of such charges. AQMD may reduce payments on invoices by those charges for which receipts were not provided.
  - iii) AQMD shall not pay interest, fees, handling charges, or cost of money on Contract.
- D. AQMD shall reimburse CONTRACTOR for travel-related expenses only if such travel is expressly set forth in Attachment 2 – Cost Schedule of this Contract or pre-authorized by AQMD in writing.
  - i) AQMD's reimbursement of travel-related expenses shall cover lodging, meals, other incidental expenses, and costs of transportation subject to the following limitations:
    - Air Transportation - Coach class rate for all flights. If coach is not available, business class rate is permissible.
    - Car Rental - A compact car rental. A mid-size car rental is permissible if car rental is shared by three or more individuals.
    - Lodging - Up to One Hundred Fifty Dollars (\$150) per night. A higher amount of reimbursement is permissible if pre-approved by AQMD.
    - Meals - Daily allowance is Fifty Dollars (\$50.00).
  - ii) Supporting documentation shall be provided for travel-related expenses in accordance with the following requirements:
    - Lodging, Airfare, Car Rentals - Bill(s) for actual expenses incurred.
    - Meals - Meals billed in excess of \$50.00 each day require receipts or other supporting documentation for the total amount of the bill and must be approved by AQMD.
    - Mileage - Beginning each January 1, the rate shall be adjusted effective February 1 by the Chief Financial Officer based on the Internal Revenue Service Standard Mileage Rate
    - Other travel-related expenses - Receipts are required for all individual items.
- E. AQMD reserves the right to disallow charges when the invoiced services are not performed satisfactorily in AQMD sole judgment.

- 10. INTELLECTUAL PROPERTY RIGHTS - Title and full ownership rights to any software, documents, or reports developed under this Contract shall at all times remain with AQMD. Such material is agreed to be AQMD proprietary information.

- A. Rights of Technical Data - AQMD shall have the unlimited right to use technical data, including material designated as a trade secret, resulting from the performance of services by CONTRACTOR under this Contract. CONTRACTOR shall have the right to use technical data for its own benefit.
- B. Copyright - CONTRACTOR agrees to grant AQMD a royalty-free, nonexclusive, irrevocable license to produce, translate, publish, use, and dispose of all copyrightable material first produced or composed in the performance of this Contract.

11. NOTICES - Any notices from either party to the other shall be given in writing to the attention of the persons listed below, or to other such addresses or addressees as may hereafter be designated in writing for notices by either party to the other. Notice shall be given by certified, express, or registered mail, return receipt requested, and shall be effective as of the date of receipt indicated on the return receipt card.

AQMD: South Coast Air Quality Management District  
 21865 Copley Drive  
 Diamond Bar, CA 91765-4178  
 Attn: \*\*\*

CONTRACTOR: \*\*\*  
 \*\*\*  
 \*\*\*  
 Attn: \*\*\*

12. EMPLOYEES OF CONTRACTOR

- A. AQMD reserves the right to review the resumes of any of CONTRACTOR employees, and/or any subcontractors selected to perform the work specified here and to disapprove CONTRACTOR choices. CONTRACTOR warrants that it will employ no subcontractor without written approval from AQMD. CONTRACTOR shall be responsible for the cost of regular pay to its employees, as well as cost of vacation, vacation replacements, sick leave, severance pay and pay for legal holidays.
- B. CONTRACTOR, its officers, employees, agents, representatives or subcontractors shall in no sense be considered employees or agents of AQMD, nor shall CONTRACTOR, its officers, employees, agents, representatives or subcontractors be entitled to or eligible to participate in any benefits, privileges, or plans, given or extended by AQMD to its employees.
- C. AQMD requires Contractor to be in compliance with all state and federal laws and regulations with respect to its employees throughout the term of this Contract, including state minimum wage laws and OSHA requirements.

13. CONFIDENTIALITY - It is expressly understood and agreed that AQMD may designate in a conspicuous manner the information which CONTRACTOR obtains from AQMD as confidential. CONTRACTOR agrees to:

- A. Observe complete confidentiality with respect to such information, including without limitation, agreeing not to disclose or otherwise permit access to such information by any other person or entity in any manner whatsoever, except that such disclosure or access shall be permitted to employees or subcontractors of CONTRACTOR requiring access in fulfillment of the services provided under this Contract.
- B. Ensure that CONTRACTOR's officers, employees, agents, representatives, and independent contractors are informed of the confidential nature of such information and to assure by agreement or otherwise that they are prohibited from copying or revealing, for any purpose whatsoever, the contents of such information or any part thereof, or from taking any action otherwise prohibited under this clause.

- C. Not use such information or any part thereof in the performance of services to others or for the benefit of others in any form whatsoever whether gratuitously or for valuable consideration, except as permitted under this Contract.
- D. Notify AQMD promptly and in writing of the circumstances surrounding any possession, use, or knowledge of such information or any part thereof by any person or entity other than those authorized by this clause.
- E. Take at CONTRACTOR expense, but at AQMD's option and in any event under AQMD's control, any legal action necessary to prevent unauthorized use of such information by any third party or entity which has gained access to such information at least in part due to the fault of CONTRACTOR.
- F. Take any and all other actions necessary or desirable to assure such continued confidentiality and protection of such information.
- G. Prevent access to such information by any person or entity not authorized under this Contract.
- H. Establish specific procedures in order to fulfill the obligations of this clause.
- I. Notwithstanding the above, nothing herein is intended to abrogate or modify the provisions of Government Code Section 6250 et seq. (Public Records Act).

14. PUBLICATION

- A. AQMD shall have the right of prior written approval of any document which shall be disseminated to the public by CONTRACTOR in which CONTRACTOR utilized information obtained from AQMD in connection with performance under this Contract.
- B. Information, data, documents, or reports developed by CONTRACTOR for AQMD, pursuant to this Contract, shall be part of AQMD public record unless otherwise indicated. CONTRACTOR may use or publish, at its own expense, such information provided to AQMD. The following acknowledgment of support and disclaimer must appear in each publication of materials, whether copyrighted or not, based upon or developed under this Contract.  

"This report was prepared as a result of work sponsored, paid for, in whole or in part, by the South Coast Air Quality Management District (AQMD). The opinions, findings, conclusions, and recommendations are those of the author and do not necessarily represent the views of AQMD. AQMD, its officers, employees, contractors, and subcontractors make no warranty, expressed or implied, and assume no legal liability for the information in this report. AQMD has not approved or disapproved this report, nor has AQMD passed upon the accuracy or adequacy of the information contained herein."
- C. CONTRACTOR shall inform its officers, employees, and subcontractors involved in the performance of this Contract of the restrictions contained herein and require compliance with the above.

15. NON-DISCRIMINATION - In the performance of this Contract, CONTRACTOR shall not discriminate in recruiting, hiring, promotion, demotion, or termination practices on the basis of race, religious creed, color, national origin, ancestry, sex, age, or physical or mental disability and shall comply with the provisions of the California Fair Employment & Housing Act (Government Code Section 12900 et seq.), the Federal Civil Rights Act of 1964 (P.L. 88-352) and all amendments thereto, Executive Order No. 11246 (30 Federal Register 12319), and all administrative rules and regulations issued pursuant to said Acts and Order. CONTRACTOR shall likewise require each subcontractor to comply with this clause and shall include in each such subcontract language similar to this clause.

16. SOLICITATION OF EMPLOYEES - CONTRACTOR expressly agrees that CONTRACTOR shall not, during the term of this Contract, nor for a period of six months after termination, solicit for employment, whether as an employee or independent contractor, any person who is or has been employed by AQMD during the term of this Contract without the consent of AQMD.

17. PROPERTY AND SECURITY - Without limiting CONTRACTOR obligations with regard to security, CONTRACTOR shall comply with all the rules and regulations established by AQMD for access to and activity in and around AQMD premises.
18. ASSIGNMENT - The rights granted hereby may not be assigned, sold, licensed, or otherwise transferred by either party without the prior written consent of the other, and any attempt by either party to do so shall be void upon inception.
19. NON-EFFECT OF WAIVER - The failure of CONTRACTOR or AQMD to insist upon the performance of any or all of the terms, covenants, or conditions of this Contract, or failure to exercise any rights or remedies hereunder, shall not be construed as a waiver or relinquishment of the future performance of any such terms, covenants, or conditions, or of the future exercise of such rights or remedies, unless otherwise provided for herein.
20. ATTORNEYS' FEES - In the event any action is filed in connection with the enforcement or interpretation of this Contract, each party shall bear its own attorneys' fees and costs.
21. FORCE MAJEURE - Neither AQMD nor CONTRACTOR shall be liable or deemed to be in default for any delay or failure in performance under this Contract or interruption of services resulting, directly or indirectly, from acts of God, civil or military authority, acts of public enemy, war, strikes, labor disputes, shortages of suitable parts, materials, labor or transportation, or any similar cause beyond the reasonable control of AQMD or CONTRACTOR.
22. SEVERABILITY - In the event that any one or more of the provisions contained in this Contract shall for any reason be held to be unenforceable in any respect by a court of competent jurisdiction, such holding shall not affect any other provisions of this Contract, and the Contract shall then be construed as if such unenforceable provisions are not a part hereof.
23. HEADINGS - Headings on the clauses of this Contract are for convenience and reference only, and the words contained therein shall in no way be held to explain, modify, amplify, or aid in the interpretation, construction, or meaning of the provisions of this Contract.
24. DUPLICATE EXECUTION - This Contract is executed in duplicate. Each signed copy shall have the force and effect of an original.
25. GOVERNING LAW - This Contract shall be construed and interpreted and the legal relations created thereby shall be determined in accordance with the laws of the State of California. Venue for resolution of any disputes under this Contract shall be Los Angeles County, California.
26. CITIZENSHIP AND ALIEN STATUS
  - A. CONTRACTOR warrants that it fully complies with all laws regarding the employment of aliens and others, and that its employees performing services hereunder meet the citizenship or alien status requirements contained in federal and state statutes and regulations including, but not limited to, the Immigration Reform and Control Act of 1986 (P.L. 99-603). CONTRACTOR shall obtain from all covered employees performing services hereunder all verification and other documentation of employees' eligibility status required by federal statutes and regulations as they currently exist and as they may be hereafter amended. CONTRACTOR shall have a continuing obligation to verify and document the continuing employment authorization and authorized alien status of employees performing services under this Contract to insure continued compliance with all federal statutes and regulations.

- B. Notwithstanding paragraph A above, CONTRACTOR, in the performance of this Contract, shall not discriminate against any person in violation of 8 USC Section 1324b.
- C. CONTRACTOR shall retain such documentation for all covered employees for the period described by law. CONTRACTOR shall indemnify, defend, and hold harmless AQMD, its officers and employees from employer sanctions and other liability which may be assessed against CONTRACTOR or AQMD, or both in connection with any alleged violation of federal statutes or regulations pertaining to the eligibility for employment of persons performing services under this Contract.
27. FEDERAL FAIR SHARE POLICY - As a recipient of Environmental Protection Agency (EPA) grant funds, AQMD is required to flow down to all of its contractors the provisions of 40 CFR Section 31.36(e) which addresses affirmative steps for contracting with small-and-minority firms, women's business enterprises, and labor surplus area firms. CONTRACTOR agrees to comply with these provisions.
28. REQUIREMENT FOR FILING STATEMENT OF ECONOMIC INTERESTS - In accordance with the Political Reform Act of 1974 (Government Code Sec. 81000 et seq.) and regulations issued by the Fair Political Practices Commission (FPPC), AQMD has determined that the nature of the work to be performed under this Contract requires CONTRACTOR to submit a Form 700, Statement of Economic Interests for Designated Officials and Employees, for each of its employees assigned to work on this Contract. These forms may be obtained from AQMD's District Counsel's office. **[USE IF REQUIRED]**
29. COMPLIANCE WITH SINGLE AUDIT ACT REQUIREMENTS **[OPTIONAL - TO BE INCLUDED IN CONTRACTS WITH FOR-PROFIT CONTRACTORS WHICH HAVE FEDERAL PASS-THROUGH FUNDING]** - During the term of the Contract, and for a period of three (3) years from the date of Contract expiration, and if requested in writing by the AQMD, CONTRACTOR shall allow the AQMD, its designated representatives and/or the cognizant Federal Audit Agency, access during normal business hours to all records and reports related to the work performed under this Contract. CONTRACTOR assumes sole responsibility for reimbursement to the Federal Agency funding the prime grant or contract, a sum of money equivalent to the amount of any expenditures disallowed should the AQMD, its designated representatives and/or the cognizant Federal Audit Agency rule through audit exception or some other appropriate means that expenditures from funds allocated to the CONTRACTOR were not made in compliance with the applicable cost principles, regulations of the funding agency, or the provisions of this Contract.

**[OPTIONAL - TO BE INCLUDED IN CONTRACTS WITH NON-PROFIT CONTRACTORS WHICH HAVE FEDERAL PASS-THROUGH FUNDING]** - Beginning with CONTRACTOR's current fiscal year and continuing through the term of this Contract, CONTRACTOR shall have a single or program-specific audit conducted in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-133 (Audits of States, Local Governments and Non-Profit Organizations), if CONTRACTOR expended Five Hundred Thousand Dollars (\$500,000) or more in a year in Federal Awards. Such audit shall be conducted by a firm of independent accountants in accordance with Generally Accepted Government Audit Standards (GAGAS). Within thirty (30) days of Contract execution, CONTRACTOR shall forward to AQMD the most recent A-133 Audit Report issued by its independent auditors. Subsequent A-133 Audit Reports shall be submitted to the AQMD within thirty (30) days of issuance.

CONTRACTOR shall allow the AQMD, its designated representatives and/or the cognizant Federal Audit Agency, access during normal business hours to all records and reports related to the work performed under this Contract. CONTRACTOR assumes sole responsibility for reimbursement to the Federal Agency funding the prime grant or contract, a sum of money equivalent to the amount of any expenditures disallowed should the AQMD, its designated representatives and/or the cognizant Federal Audit Agency rule through audit exception or some other appropriate means that expenditures from funds allocated to the CONTRACTOR were

not made in compliance with the applicable cost principles, regulations of the funding agency, or the provisions of this Contract.

30. OPTION TO EXTEND THE TERM OF THE CONTRACT - AQMD reserves the right to extend the contract for a one-year period commencing \*\*\*\*\*(enter date) at the (option price or Not-to-Exceed Amount) set forth in Attachment 2. In the event that AQMD elects to extend the contract, a written notice of its intent to extend the contract shall be provided to CONTRACTOR no later than thirty (30) days prior to Contract expiration. [USE IF REQUIRED]
31. KEY PERSONNEL - *insert person's name* is deemed critical to the successful performance of this Contract. Any changes in key personnel by CONTRACTOR must be approved by AQMD. All substitute personnel must possess qualifications/experience equal to the original named key personnel and must be approved by AQMD. AQMD reserves the right to interview proposed substitute key personnel. [USE IF REQUIRED]
32. PREVAILING WAGES – [USE FOR INFRASTRUCTURE PROJECTS] CONTRACTOR is alerted to the prevailing wage requirements of California Labor Code section 1770 et seq. Copies of the prevailing rate of per diem wages are on file at the AQMD's headquarters, of which shall be made available to any interested party on request. Notwithstanding the preceding sentence, CONTRACTOR shall be responsible for determining the applicability of the provisions of California Labor Code and complying with the same, including, without limitation, obtaining from the Director of the Department of Industrial Relations the general prevailing rate of per diem wages and the general prevailing rate for holiday and overtime work, making the same available to any interested party upon request, paying any applicable prevailing rates, posting copies thereof at the job site and flowing all applicable prevailing wage rate requirements to its subcontractors. CONTRACTOR shall indemnify, defend and hold harmless the South Coast Air Quality Management District against any and all claims, demands, damages, defense costs or liabilities based on failure to adhere to the above referenced statutes.
33. APPROVAL OF SUBCONTRACT
- A. If CONTRACTOR intends to subcontract a portion of the work under this Contract, written approval of the terms of the proposed subcontract(s) shall be obtained from AQMD's Executive Officer or designee prior to execution of the subcontract. No subcontract charges will be reimbursed unless such approval has been obtained.
- B. Any material changes to the subcontract(s) that affect the scope of work, deliverable schedule, and/or cost schedule shall also require the written approval of the Executive Officer or designee prior to execution.
- C. The sole purpose of AQMD's review is to insure that AQMD's contract rights have not been diminished in the subcontractor agreement. AQMD shall not supervise, direct, or have control over, or be responsible for, subcontractor's means, methods, techniques, work sequences or procedures or for the safety precautions and programs incident thereto, or for any failure of subcontractor to comply with any local, state, or federal laws, or rules or regulations.
34. ENTIRE CONTRACT - This Contract represents the entire agreement between the parties hereto related to CONTRACTOR providing services to AQMD and there are no understandings, representations, or warranties of any kind except as expressly set forth herein. No waiver, alteration, or modification of any of the provisions herein shall be binding on any party unless in writing and signed by the party against whom enforcement of such waiver, alteration, or modification is sought.

IN WITNESS WHEREOF, the parties to this Contract have caused this Contract to be duly executed on their behalf by their authorized representatives.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT \*\*\*

By: \_\_\_\_\_ By: \_\_\_\_\_  
Barry R. Wallerstein, D.Env., Executive Officer      Name:  
Dr. William A. Burke, Chairman, Governing Board      Title:

Date: \_\_\_\_\_ Date: \_\_\_\_\_

ATTEST:  
Saundra McDaniel, Clerk of the Board

By: \_\_\_\_\_

APPROVED AS TO FORM:  
Kurt R. Wiese, General Counsel

By: \_\_\_\_\_



# **ATTACHMENT A**

## **CERTIFICATIONS AND REPRESENTATIONS**



# South Coast Air Quality Management District

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

## **Business Information Request**

Dear SCAQMD Contractor/Supplier:

The South Coast Air Quality Management District (SCAQMD) is committed to ensuring that our contractor/supplier records are current and accurate. If your firm is selected for award of a purchase order or contract, it is imperative that the information requested herein be supplied in a timely manner to facilitate payment of invoices. In order to process your payments, we need the enclosed information regarding your account. **Please review and complete the information identified on the following pages, complete the enclosed W-9 form, remember to sign both documents for our files, and return them as soon as possible to the address below:**

**Attention: Accounts Payable, Accounting Department  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178**

If you do not return this information, we will not be able to establish you as a vendor. This will delay any payments and would still necessitate your submittal of the enclosed information to our Accounting department before payment could be initiated. Completion of this document and enclosed forms would ensure that your payments are processed timely and accurately.

If you have any questions or need assistance in completing this information, please contact Accounting at (909) 396-3777. We appreciate your cooperation in completing this necessary information.

Sincerely,

Michael B. O'Kelly  
Chief Financial Officer

DH:tm

Enclosures: Business Information Request  
Disadvantaged Business Certification  
W-9  
Federal Contract Debarment Certification  
Campaign Contribution Disclosure



# South Coast Air Quality Management District

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

## BUSINESS INFORMATION REQUEST

Business Name	
Division of	
Subsidiary of	
Website Address	
Type of Business <i>Check One:</i>	<input type="checkbox"/> Individual <input type="checkbox"/> DBA, Name _____, County Filed In _____ <input type="checkbox"/> Corporation, ID No. _____ <input type="checkbox"/> LLC/LLP, ID No. _____ <input type="checkbox"/> Other _____

## REMITTING ADDRESS INFORMATION

Address			
City/Town			
State/Province		Zip	
Phone	(     )     -     Ext	Fax	(     )     -
Contact		Title	
E-mail Address			
Payment Name if Different			

All invoices must reference the corresponding Purchase Order Number(s)/Contract Number(s) if applicable and mailed to:

**Attention: Accounts Payable, Accounting Department**

**South Coast Air Quality Management District  
21865 Copley Drive**

**Diamond Bar, CA 91765-4178**  
**DISADVANTAGED BUSINESS CERTIFICATION**

Federal guidance for utilization of disadvantaged business enterprises allows a vendor to be deemed a small business enterprise (SBE), minority business enterprise (MBE) or women business enterprise (WBE) if it meets the criteria below.

- is certified by the Small Business Administration or
- is certified by a state or federal agency or
- is an independent MBE(s) or WBE(s) business concern which is at least 51 percent owned and controlled by minority group member(s) who are citizens of the United States.

Statements of certification:

As a prime contractor to the SCAQMD, \_\_\_\_\_ (name of business) will engage in good faith efforts to achieve the fair share in accordance with 40 CFR Section 31.36(e), and will follow the six affirmative steps listed below **for contracts or purchase orders funded in whole or in part by federal grants and contracts.**

1. Place qualified SBEs, MBEs, and WBEs on solicitation lists.
2. Assure that SBEs, MBEs, and WBEs are solicited whenever possible.
3. When economically feasible, divide total requirements into small tasks or quantities to permit greater participation by SBEs, MBEs, and WBEs.
4. Establish delivery schedules, if possible, to encourage participation by SBEs, MBEs, and WBEs.
5. Use services of Small Business Administration, Minority Business Development Agency of the Department of Commerce, and/or any agency authorized as a clearinghouse for SBEs, MBEs, and WBEs.
6. If subcontracts are to be let, take the above affirmative steps.

Self-Certification Verification: Also for use in awarding additional points, as applicable, in accordance with SCAQMD Procurement Policy and Procedure:

Check all that apply:

Small Business Enterprise/Small Business Joint Venture      Women-owned Business Enterprise  
Local business      Disabled Veteran-owned Business Enterprise/DVBE Joint Venture  
Minority-owned Business Enterprise

Percent of ownership: \_\_\_\_\_ %

Name of Qualifying Owner(s): \_\_\_\_\_

I, the undersigned, hereby declare that to the best of my knowledge the above information is accurate. Upon penalty of perjury, I certify information submitted is factual.

\_\_\_\_\_  
NAME

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
TELEPHONE NUMBER

\_\_\_\_\_  
DATE

## DEFINITIONS

**Disabled Veteran-Owned Business Enterprise** means a business that meets all of the following criteria:

- is a sole proprietorship or partnership of which is at least 51 percent owned by one or more disabled veterans, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
- the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.
- is a sole proprietorship, corporation, partnership, or joint venture with its primary headquarters office located in the United States and which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.

**Joint Venture** means that one party to the joint venture is a DVBE and owns at least 51 percent of the joint venture. In the case of a joint venture formed for a single project this means that DVBE will receive at least 51 percent of the project dollars.

**Local Business** means a business that meets all of the following criteria:

- has an ongoing business within the boundary of the SCAQMD at the time of bid application.
- performs 90 percent of the work within SCAQMD's jurisdiction.

**Minority-Owned Business Enterprise** means a business that meets all of the following criteria:

- is at least 51 percent owned by one or more minority persons or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more minority persons.
- is a business whose management and daily business operations are controlled or owned by one or more minority person.
- is a business which is a sole proprietorship, corporation, partnership, joint venture, an association, or a cooperative with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign business.

"Minority" person means a Black American, Hispanic American, Native American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian American (including a person whose origins are from India, Pakistan, or Bangladesh), Asian-Pacific American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, or Taiwan).

**Small Business Enterprise** means a business that meets the following criteria:

b.1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:

- **A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or**

- A manufacturer with 100 or fewer employees.

c. Manufacturer means a business that is both of the following:

- 3) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
- 4) Classified between Codes 311000 to 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.

**Small Business Joint Venture** means that one party to the joint venture is a Small Business and owns at least 51 percent of the joint venture. In the case of a joint venture formed for a single project this means that the Small Business will receive at least 51 percent of the project dollars.

**Women-Owned Business Enterprise** means a business that meets all of the following criteria:

- is at least 51 percent owned by one or more women or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more women.
- is a business whose management and daily business operations are controlled or owned by one or more women.
- is a business which is a sole proprietorship, corporation, partnership, or a joint venture, with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign business.

## Request for Taxpayer Identification Number and Certification

**Give Form to the  
requester. Do not  
send to the IRS.**

Print or type See Specific Instructions on page 2.	Name (as shown on your income tax return)	
	Business name/disregarded entity name, if different from above	
	Check appropriate box for federal tax classification (required): <input type="checkbox"/> Individual/sole proprietor <input type="checkbox"/> C Corporation <input type="checkbox"/> S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Trust/estate <input type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=partnership) ▶ _____ <input type="checkbox"/> Other (see instructions) ▶ _____	
	<input type="checkbox"/> Exempt payee	
	Address (number, street, and apt. or suite no.)	Requester's name and address (optional)
	City, state, and ZIP code	
List account number(s) here (optional)		

### Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on the "Name" line to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

<b>Social security number</b>								
		-		-				

**Note.** If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

<b>Employer identification number</b>									
		-							

### Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. citizen or other U.S. person (defined below).

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions on page 4.

<b>Sign Here</b>	Signature of U.S. person ▶	Date ▶
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### General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

#### Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

**Note.** If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

**Definition of a U.S. person.** For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

**Special rules for partnerships.** Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

The person who gives Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States is in the following cases:

- The U.S. owner of a disregarded entity and not the entity,
- The U.S. grantor or other owner of a grantor trust and not the trust, and
- The U.S. trust (other than a grantor trust) and not the beneficiaries of the trust.

**Foreign person.** If you are a foreign person, do not use Form W-9. Instead, use the appropriate Form W-8 (see Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities).

**Nonresident alien who becomes a resident alien.** Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a "saving clause." Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the payee has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items:

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.
4. The type and amount of income that qualifies for the exemption from tax.
5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

**Example.** Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if his or her stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first protocol) and is relying on this exception to claim an exemption from tax on his or her scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity not subject to backup withholding, give the requester the appropriate completed Form W-8.

**What is backup withholding?** Persons making certain payments to you must under certain conditions withhold and pay to the IRS a percentage of such payments. This is called "backup withholding." Payments that may be subject to backup withholding include interest, tax-exempt interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

#### Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester,
2. You do not certify your TIN when required (see the Part II instructions on page 3 for details),
3. The IRS tells the requester that you furnished an incorrect TIN,
4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or
5. You do not certify to the requester that you are not subject to backup withholding under 4 above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See the instructions below and the separate Instructions for the Requester of Form W-9.

Also see *Special rules for partnerships* on page 1.

#### Updating Your Information

You must provide updated information to any person to whom you claimed to be an exempt payee if you are no longer an exempt payee and anticipate receiving reportable payments in the future from this person. For example, you may need to provide updated information if you are a C corporation that elects to be an S corporation, or if you no longer are tax exempt. In addition, you must furnish a new Form W-9 if the name or TIN changes for the account, for example, if the grantor of a grantor trust dies.

#### Penalties

**Failure to furnish TIN.** If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

**Civil penalty for false information with respect to withholding.** If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

**Criminal penalty for falsifying information.** Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

**Misuse of TINs.** If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

#### Specific Instructions

##### Name

If you are an individual, you must generally enter the name shown on your income tax return. However, if you have changed your last name, for instance, due to marriage without informing the Social Security Administration of the name change, enter your first name, the last name shown on your social security card, and your new last name.

If the account is in joint names, list first, and then circle, the name of the person or entity whose number you entered in Part I of the form.

**Sole proprietor.** Enter your individual name as shown on your income tax return on the "Name" line. You may enter your business, trade, or "doing business as (DBA)" name on the "Business name/disregarded entity name" line.

**Partnership, C Corporation, or S Corporation.** Enter the entity's name on the "Name" line and any business, trade, or "doing business as (DBA) name" on the "Business name/disregarded entity name" line.

**Disregarded entity.** Enter the owner's name on the "Name" line. The name of the entity entered on the "Name" line should never be a disregarded entity. The name on the "Name" line must be the name shown on the income tax return on which the income will be reported. For example, if a foreign LLC that is treated as a disregarded entity for U.S. federal tax purposes has a domestic owner, the domestic owner's name is required to be provided on the "Name" line. If the direct owner of the entity is also a disregarded entity, enter the first owner that is not disregarded for federal tax purposes. Enter the disregarded entity's name on the "Business name/disregarded entity name" line. If the owner of the disregarded entity is a foreign person, you must complete an appropriate Form W-8.

**Note.** Check the appropriate box for the federal tax classification of the person whose name is entered on the "Name" line (Individual/sole proprietor, Partnership, C Corporation, S Corporation, Trust/estate).

**Limited Liability Company (LLC).** If the person identified on the "Name" line is an LLC, check the "Limited liability company" box only and enter the appropriate code for the tax classification in the space provided. If you are an LLC that is treated as a partnership for federal tax purposes, enter "P" for partnership. If you are an LLC that has filed a Form 8832 or a Form 2553 to be taxed as a corporation, enter "C" for C corporation or "S" for S corporation. If you are an LLC that is disregarded as an entity separate from its owner under Regulation section 301.7701-3 (except for employment and excise tax), do not check the LLC box unless the owner of the LLC (required to be identified on the "Name" line) is another LLC that is not disregarded for federal tax purposes. If the LLC is disregarded as an entity separate from its owner, enter the appropriate tax classification of the owner identified on the "Name" line.



**Other entities.** Enter your business name as shown on required federal tax documents on the "Name" line. This name should match the name shown on the charter or other legal document creating the entity. You may enter any business, trade, or DBA name on the "Business name/disregarded entity name" line.

### Exempt Payee

If you are exempt from backup withholding, enter your name as described above and check the appropriate box for your status, then check the "Exempt payee" box in the line following the "Business name/disregarded entity name," sign and date the form.

Generally, individuals (including sole proprietors) are not exempt from backup withholding. Corporations are exempt from backup withholding for certain payments, such as interest and dividends.

**Note.** If you are exempt from backup withholding, you should still complete this form to avoid possible erroneous backup withholding.

The following payees are exempt from backup withholding:

1. An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2),

2. The United States or any of its agencies or instrumentalities,

3. A state, the District of Columbia, a possession of the United States, or any of their political subdivisions or instrumentalities,

4. A foreign government or any of its political subdivisions, agencies, or instrumentalities, or

5. An international organization or any of its agencies or instrumentalities.

Other payees that may be exempt from backup withholding include:

6. A corporation,

7. A foreign central bank of issue,

8. A dealer in securities or commodities required to register in the United States, the District of Columbia, or a possession of the United States,

9. A futures commission merchant registered with the Commodity Futures Trading Commission,

10. A real estate investment trust,

11. An entity registered at all times during the tax year under the Investment Company Act of 1940,

12. A common trust fund operated by a bank under section 584(a),

13. A financial institution,

14. A middleman known in the investment community as a nominee or custodian, or

15. A trust exempt from tax under section 664 or described in section 4947.

The following chart shows types of payments that may be exempt from backup withholding. The chart applies to the exempt payees listed above, 1 through 15.

IF the payment is for . . .	THEN the payment is exempt for . . .
Interest and dividend payments	All exempt payees except for 9
Broker transactions	Exempt payees 1 through 5 and 7 through 13. Also, C corporations.
Barter exchange transactions and patronage dividends	Exempt payees 1 through 5
Payments over \$600 required to be reported and direct sales over \$5,000 <sup>1</sup>	Generally, exempt payees 1 through 7 <sup>2</sup>

<sup>1</sup> See Form 1099-MISC, Miscellaneous Income, and its instructions.

<sup>2</sup> However, the following payments made to a corporation and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees, gross proceeds paid to an attorney, and payments for services paid by a federal executive agency.

### Part I. Taxpayer Identification Number (TIN)

**Enter your TIN in the appropriate box.** If you are a resident alien and you do not have and are not eligible to get an SSN, your TIN is your IRS individual taxpayer identification number (ITIN). Enter it in the social security number box. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN. However, the IRS prefers that you use your SSN.

If you are a single-member LLC that is disregarded as an entity separate from its owner (see *Limited Liability Company (LLC)* on page 2), enter the owner's SSN (or EIN, if the owner has one). Do not enter the disregarded entity's EIN. If the LLC is classified as a corporation or partnership, enter the entity's EIN.

**Note.** See the chart on page 4 for further clarification of name and TIN combinations.

**How to get a TIN.** If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local Social Security Administration office or get this form online at [www.ssa.gov](http://www.ssa.gov). You may also get this form by calling 1-800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at [www.irs.gov/businesses](http://www.irs.gov/businesses) and clicking on Employer Identification Number (EIN) under Starting a Business. You can get Forms W-7 and SS-4 from the IRS by visiting [IRS.gov](http://IRS.gov) or by calling 1-800-TAX-FORM (1-800-829-3676).

If you are asked to complete Form W-9 but do not have a TIN, write "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, generally you will have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

**Note.** Entering "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon.

**Caution:** A disregarded domestic entity that has a foreign owner must use the appropriate Form W-8.

### Part II. Certification

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if item 1, below, and items 4 and 5 on page 4 indicate otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). In the case of a disregarded entity, the person identified on the "Name" line must sign. Exempt payees, see *Exempt Payee* on page 3.

**Signature requirements.** Complete the certification as indicated in items 1 through 3, below, and items 4 and 5 on page 4.

**1. Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983.** You must give your correct TIN, but you do not have to sign the certification.

**2. Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983.** You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.

**3. Real estate transactions.** You must sign the certification. You may cross out item 2 of the certification.

**4. Other payments.** You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

**5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions.** You must give your correct TIN, but you do not have to sign the certification.

### What Name and Number To Give the Requester

For this type of account:	Give name and SSN of:
1. Individual	The individual
2. Two or more individuals (joint account)	The actual owner of the account or, if combined funds, the first individual on the account <sup>1</sup>
3. Custodian account of a minor (Uniform Gift to Minors Act)	The minor <sup>2</sup>
4. a. The usual revocable savings trust (grantor is also trustee)	The grantor-trustee <sup>1</sup>
b. So-called trust account that is not a legal or valid trust under state law	The actual owner <sup>1</sup>
5. Sole proprietorship or disregarded entity owned by an individual	The owner <sup>3</sup>
6. Grantor trust filing under Optional Form 1099 Filing Method 1 (see Regulation section 1.671-4(b)(2)(i)(A))	The grantor <sup>4</sup>
For this type of account:	Give name and EIN of:
7. Disregarded entity not owned by an individual	The owner
8. A valid trust, estate, or pension trust	Legal entity <sup>4</sup>
9. Corporation or LLC electing corporate status on Form 8832 or Form 2553	The corporation
10. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
11. Partnership or multi-member LLC	The partnership
12. A broker or registered nominee	The broker or nominee
13. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments	The public entity
14. Grantor trust filing under the Form 1041 Filing Method or the Optional Form 1099 Filing Method 2 (see Regulation section 1.671-4(b)(2)(i)(B))	The trust

<sup>1</sup> List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

<sup>2</sup> Circle the minor's name and furnish the minor's SSN.

<sup>3</sup> You must show your individual name and you may also enter your business or "DBA" name on the "Business name/disregarded entity" name line. You may use either your SSN or EIN (if you have one), but the IRS encourages you to use your SSN.

<sup>4</sup> List first and circle the name of the trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.) Also see *Special rules for partnerships* on page 1.

**\*Note.** Grantor also must provide a Form W-9 to trustee of trust.

**Note.** If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

### Secure Your Tax Records from Identity Theft

Identity theft occurs when someone uses your personal information such as your name, social security number (SSN), or other identifying information, without your permission, to commit fraud or other crimes. An identity thief may use your SSN to get a job or may file a tax return using your SSN to receive a refund.

To reduce your risk:

- Protect your SSN.
- Ensure your employer is protecting your SSN, and
- Be careful when choosing a tax preparer.

If your tax records are affected by identity theft and you receive a notice from the IRS, respond right away to the name and phone number printed on the IRS notice or letter.

If your tax records are not currently affected by identity theft but you think you are at risk due to a lost or stolen purse or wallet, questionable credit card activity or credit report, contact the IRS Identity Theft Hotline at 1-800-908-4490 or submit Form 14039.

For more information, see Publication 4535, Identity Theft Prevention and Victim Assistance.

Victims of identity theft who are experiencing economic harm or a system problem, or are seeking help in resolving tax problems that have not been resolved through normal channels, may be eligible for Taxpayer Advocate Service (TAS) assistance. You can reach TAS by calling the TAS toll-free case intake line at 1-877-777-4778 or TTY/TDD 1-800-829-4059.

**Protect yourself from suspicious emails or phishing schemes.** Phishing is the creation and use of email and websites designed to mimic legitimate business emails and websites. The most common act is sending an email to a user falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft.

The IRS does not initiate contacts with taxpayers via emails. Also, the IRS does not request personal detailed information through email or ask taxpayers for the PIN numbers, passwords, or similar secret access information for their credit card, bank, or other financial accounts.

If you receive an unsolicited email claiming to be from the IRS, forward this message to [phishing@irs.gov](mailto:phishing@irs.gov). You may also report misuse of the IRS name, logo, or other IRS property to the Treasury Inspector General for Tax Administration at 1-800-366-4484. You can forward suspicious emails to the Federal Trade Commission at: [spam@uce.gov](mailto:spam@uce.gov) or contact them at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or 1-877-IDTHEFT (1-877-438-4338).

Visit [IRS.gov](http://IRS.gov) to learn more about identity theft and how to reduce your risk.

### Privacy Act Notice

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons (including federal agencies) who are required to file information returns with the IRS to report interest, dividends, or certain other income paid to you; mortgage interest you paid; the acquisition or abandonment of secured property; the cancellation of debt; or contributions you made to an IRA, Archer MSA, or HSA. The person collecting this form uses the information on the form to file information returns with the IRS, reporting the above information. Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation and to cities, states, the District of Columbia, and U.S. possessions for use in administering their laws. The information also may be disclosed to other countries under a treaty, to federal and state agencies to enforce civil and criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism. You must provide your TIN whether or not you are required to file a tax return. Under section 3406, payers must generally withhold a percentage of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to the payer. Certain penalties may also apply for providing false or fraudulent information.



United State Environmental Protection Agency  
Washington, DC 20460

## **Certification Regarding Debarment, Suspension, and Other Responsibility Matters**

The prospective participant certifies to the best of its knowledge and belief that it and the principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three year period preceding this proposal been convicted of or had a civil judgement rendered against them or commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction: violation of Federal or State antitrust statute or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

I understand that a false statement on this certification may be grounds for rejection of this proposal or termination of the award. In addition, under 18 USC Sec. 1001, a false statement may result in a fine of up to \$10,000 or imprisonment for up to 5 years, or both.

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Typed Name & Title of Authorized Representative

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Signature of Authorized Representative Date

I am unable to certify to the above statements. My explanation is attached.



## CAMPAIGN CONTRIBUTIONS DISCLOSURE

California law prohibits a party, or an agent, from making campaign contributions to AQMD Governing Board Members or members/alternates of the Mobile Source Pollution Reduction Committee (MSRC) of \$250 or more while their contract or permit is pending before the AQMD; and further prohibits a campaign contribution from being made for three (3) months following the date of the final decision by the Governing Board or the MSRC on a donor's contract or permit. Gov't Code §84308(d). For purposes of reaching the \$250 limit, the campaign contributions of the bidder or contractor plus contributions by its parents, affiliates, and related companies of the contractor or bidder are added together. 2 C.C.R. §18438.5.

In addition, Board Members or members/alternates of the MSRC must abstain from voting on a contract or permit if they have received a campaign contribution from a party or participant to the proceeding, or agent, totaling \$250 or more in the 12-month period prior to the consideration of the item by the Governing Board or the MSRC. Gov't Code §84308(c). When abstaining, the Board Member or members/alternates of the MSRC must announce the source of the campaign contribution on the record. *Id.* The requirement to abstain is triggered by campaign contributions of \$250 or more in total contributions of the bidder or contractor, *plus* any of its parent, subsidiary, or affiliated companies. 2 C.C.R. §18438.5.

In accordance with California law, bidders and contracting parties are required to disclose, at the time the application is filed, information relating to any campaign contributions made to Board Members or members/alternates of the MSRC, including: the name of the party making the contribution (which includes any parent, subsidiary or otherwise related business entity, as defined below), the amount of the contribution, and the date the contribution was made. 2 C.C.R. §18438.8(b).

The list of current AQMD Governing Board Members can be found at the AQMD website ([www.aqmd.gov](http://www.aqmd.gov)). The list of current MSRC members/alternates can be found at the MSRC website (<http://www.cleantransportationfunding.org>).

### **SECTION I. Please complete Section I.**

**Contractor:** \_\_\_\_\_

**RFP #:** \_\_\_\_\_

**List any parent, subsidiaries, or otherwise affiliated business entities of Contractor: (See definition below).**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### **SECTION II**

Has contractor and/or parent, subsidiary, or affiliated company, or agent thereof, made a campaign contribution(s) totaling \$250 or more in the aggregate to a current member of the South Coast Air Quality Management Governing Board or members/alternates of the MSRC in the 12 months preceding the date of execution of this disclosure?

Yes

No

**If YES, complete Section II below and then sign and date the form.  
If NO, sign and date below. Include this form with your submittal.**

**Campaign Contributions Disclosure, *continued*:**

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/alternate	Amount of Contribution	Date of Contribution

**I declare the foregoing disclosures to be true and correct.**

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## DEFINITIONS

### Parent, Subsidiary, or Otherwise Related Business Entity.

(1) *Parent subsidiary.* A parent subsidiary relationship exists when one corporation directly or indirectly owns shares possessing more than 50 percent of the voting power of another corporation.

(2) *Otherwise related business entity.* Business entities, including corporations, partnerships, joint ventures and any other organizations and enterprises operated for profit, which do not have a parent subsidiary relationship are otherwise related if any one of the following three tests is met:

(A) *One business entity has a controlling ownership interest in the other business entity.*

(B) *There is shared management and control between the entities. In determining whether there is shared management and control, consideration should be given to the following factors:*

(i) *The same person or substantially the same person owns and manages the two entities;*

(ii) *There are common or commingled funds or assets;*

(iii) *The business entities share the use of the same offices or employees, or otherwise share activities, resources or personnel on a regular basis;*

(iv) *There is otherwise a regular and close working relationship between the entities; or*

(C) *A controlling owner (50% or greater interest as a shareholder or as a general partner) in one entity also is a controlling owner in the other entity.*

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 4

PROPOSAL: Execute Contract for One-Year TV Partnership

SYNOPSIS: On May 4, 2012, the Board approved release of RFP #2012-22 to solicit proposals from local TV stations for a one-year media partnership including daily air quality forecasts. Four proposals were received by the RFP deadline and were evaluated based on the criteria stated in the RFP. The Administrative Committee reviewed this item on July 20, 2012 and recommended executing a contract with KABC-7 for \$145,000 for a one-year media partnership, with an option to renew for two additional one-year contracts.

COMMITTEE: Administrative, July 20, 2012, Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Appropriate \$145,000 from the Undesignated Fund Balance and transfer to the Media Office FY 2012-13 Budget, Services and Supplies Major Object, Media Relations/Outreach account.
2. Authorize the Executive Officer to execute a contract with KABC-7, in an amount not to exceed \$145,000, for a one-year media partnership with an option to renew for two additional one-year contracts.

Barry R. Wallerstein, D.Env.  
Executive Officer

SA

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**Background**

Over the past two years AQMD sponsored three short-term TV partnerships that were designed to promote either summer or winter air quality messages and encourage viewers to sign up to receive daily air quality or no-burn alerts.

In 2010, AQMD partnered with CBS 2 to promote AirAlerts.org during the summer months and KTLA 5 to promote the Check Before You Burn program during the winter season. In 2011, AQMD again partnered with KTLA 5 as well as CBS 2 to promote the

winter Check Before You Burn program. All three partnerships included daily air quality forecasts given by news weathercasters during the early morning news weather segments, TV ad spots that aired at various times during the day, and online ad banners and links.

All three partnerships appeared to be helpful in raising public awareness of AQMD's AirAlerts and Check Before You Burn programs. For example, during all three TV partnerships AQMD experienced a marked increase in the number of people signing up at AirAlerts.org to receive daily air quality forecasts and/or no-burn alerts for their area.

### **Proposal**

In an effort to continue to build awareness across the Southland about air quality and actions that individuals can take to improve it, staff proposed to seek proposals from local TV stations for a year-round local TV partnership. This would provide daily air quality reports during morning news weathercasts, and ad spots tailoring the air quality message to the season (e.g., Check Before You Burn during the winter months).

On May 4, 2012, the Board approved release of RFP #2012-22 to solicit proposals from local TV stations for a one-year media partnership including daily air quality forecasts. Partnering with a local TV station will help AQMD reach tens of thousands of Southland residents on a daily basis. In addition, a year-round TV partnership will provide significantly greater value to AQMD's outreach efforts than a traditional TV advertising campaign.

The RFP required that proposals include:

- Four themed campaigns, tailored to each of the four seasons, including summer Air Alerts, winter Check Before You Burn alerts, and air quality tips during fall and spring to motivate viewers to help improve air quality by using electric lawn mowers, zero-polluting paints, etc.;
- Daily (Monday-Friday) air quality forecasts during morning weathercasts, on-air ad spots (30-second or less) and online components such as web banners; and
- Measurement criteria such as the number of impressions from on-air/online/weather segment forecasts, as well as any increase in number of sign-ups to AirAlerts.org.

Additional consideration was given to proposals with added-value elements such as PSAs, news interviews, etc.



**Bid Evaluation**

Four proposals were received before the bidding closed at 5 p.m. on June 5, 2012. The bids were reviewed by a diverse panel in accordance with criteria contained in the RFP. The panel was composed of three AQMD employees – the Media Relations Manager, a Principal Deputy District Counsel, and a Community Relations Manager – as well as one outside expert, a Community Relations and Education Manager with the Mojave Desert Air Quality Management District. The panel breakdown was as follows: one Caucasian, three Hispanics; two male, two female. The panel scored the proposals according to criteria outlined in the RFP, without an oral interview, and forwarded a ranking of the proposals to the Administrative Committee for review. The Administrative Committee reviewed the proposal recommendations at its meeting on July 20, 2012. The committee is recommending the award of the contract to KABC-7 and is forwarding this recommendation to the full Board for consideration.

Attachment A reflects the four proposals, ranked by the panel in order by score.

**Resource Impacts**

Funding for these services will be provided for in AQMD's FY 2012-13 Budget, and the FY 2013-14 and FY 2014-15 Budgets, if additional one-year contracts are subsequently approved by the Board.

**Attachment**

A – Evaluation of Four Proposals for Administrative Committee Review for RFP #2012-22

**ATTACHMENT A**  
**EVALUATION OF TOP FOUR PROPOSALS**  
**FOR RFP #2012-22**

<b>Rank</b>	<b>Name</b>	<b>Cost</b>	<b>Technical Score</b>	<b>Cost Points</b>	<b>Small Business Points</b>	<b>Local Business Points</b>	<b>Final Score*</b>
1.	CBS/KCAL	\$150,000	73.0	16.6	10	0	99.6
2.	KABC	\$145,000	72.0	20	0	0	92.0
3.	KTLA	\$148,500	71.0	18.7	0	0	89.7
4.	NBC	\$150,000	61.5	16.6	0	5	83.1

\*Totals may differ from addition of points by 0.1 due to rounding.

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 5

**PROPOSAL:** Issue RFP for Replacement of Heating, Ventilation, and Air Conditioning Black Steel Piping at AQMD Headquarters

**SYNOPSIS:** At the February 3, 2012 meeting, the Board approved the issuance of an RFP for replacement of Heating, Ventilation and Air Conditioning (HVAC) black steel piping. In response to the RFP, the three (3) timely-received proposals all exceeded the tentative funds budgeted for this project in the FY 2011-12 Budget. Following receipt of the proposals, staff has identified alternative piping materials which may be lower in cost than traditional copper piping and afford a longer warranty period. Therefore, staff recommends releasing a new RFP soliciting additional proposals providing for the option of using piping materials other than copper.

**COMMITTEE:** Administrative, July 20, 2012, Recommended for Approval

**RECOMMENDED ACTION:**

Issue RFP #P2013-04 for the replacement of HVAC system black steel piping at AQMD headquarters with copper piping and/or comparable non-metallic materials.

Barry R. Wallerstein, D.Env.  
Executive Officer

WJ:BJ

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**Background**

On the morning of Monday, November 7, 2011, a leak in the 3-inch hot water supply line for the HVAC system in the ceiling above the Hearing Board room occurred, causing major damage to the Hearing Board room and surrounding conference rooms. Emergency plumbing repairs were completed immediately above the Hearing Board room, and remediation efforts for the significant amount of damage to the adjacent Conference Center rooms took several months to complete. However, as a preventative measure, staff recommends replacing the remaining black steel pipes in the HVAC system, primarily above the Lower and Ground Level floors of the Headquarters building.

The previously released RFP specified very exacting materials for the replacement piping. Some of the proposers submitted bids using stainless steel piping and compression fittings, which are similar to the black steel piping connection methods. Upon further research regarding the availability of new piping materials on the market and approved under the Uniform Plumbing Code, one of these materials, polypropylene-random copolymer, may potentially be a viable replacement product for the existing black steel piping at a lower cost than copper or stainless steel piping. Additionally, this product offers a ten (10) year replacement and damage warranty compared to the usual one-year warranty for more traditional piping materials. This new product may easily connect to the existing new copper line replaced over the Hearing Board room last year, and to the numerous connections to existing smaller-diameter copper piping on the 2<sup>nd</sup> to 5<sup>th</sup> floors of the building.

### **Proposal**

This action is to issue RFP #P2013-04 to solicit proposals from qualified contractors to replace degraded black steel pipes with suitable piping materials, new isolation valves and pipe insulation in AQMD's HVAC system, whether copper and/or non-metallic materials, such as polypropylene-random copolymer.

### **Outreach**

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

Additionally, potential bidders may be notified utilizing AQMD's own electronic listing of certified minority vendors. Notice of the RFP will be e-mailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at AQMD's website (<http://www.aqmd.gov> where it can be viewed by making menu selections "Inside AQMD"/"Employment and Business Opportunities"/"Business Opportunities" or by going directly to <http://www.aqmd.gov/rfp/index.html>). Information is also available on AQMD's bidder's 24-hour telephone message line (909) 396-2724.

### **Proposal Evaluation**

Proposals received will be evaluated by a diverse, technically qualified panel in accordance with criteria contained in the attached RFP.

### **Resource Impacts**

Sufficient funds are available in the District General's FY 2012-13 Budget, Capital Outlays Major Object, Capital Outlays account.

### **Attachment**

RFP #P2013-04

# **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

## **REQUEST FOR PROPOSALS**

### **REPLACEMENT OF HVAC BLACK STEEL PIPING**

#P2013-04

The South Coast Air Quality Management District (AQMD) requests proposals for the following purpose according to terms and conditions attached. In the preparation of this Request for Proposals (RFP) the words "Proposer," "Contractor," and "Consultant" are used interchangeably.

#### **PURPOSE**

The purpose of this Request for Proposals (RFP) is to solicit proposals from qualified contractors interested in providing parts, equipment, tools, labor and materials for replacing HVAC hot water supply and return black steel piping, isolation valves, and pipe insulation with metallic and/or non-metallic piping at the AQMD Diamond Bar Headquarters, located at 21865 Copley Drive, Diamond Bar, CA 91765.

#### **INDEX - The following are contained in this RFP:**

Section I	Background/Information
Section II	Contact Person
Section III	Schedule of Events
Section IV	Participation in the Procurement Process
Section V	Statement of Work/Schedule of Deliverables
Section VI	Required Qualifications
Section VII	Proposal Submittal Requirements
Section VIII	Proposal Submission
Section IX	Proposal Evaluation/Contractor Selection Criteria
Section X	Cost Proposal
Section XI	References
Section XII	Draft Contract

Attachment A – Statement of Work

Attachment B – Certifications and Representations

Attachment C – Payment Schedule

#### **SECTION I: BACKGROUND INFORMATION**

The AQMD is a regional governmental agency responsible for meeting air quality health standards in Orange County, and the urban portions of Los Angeles, Riverside, and San Bernardino Counties.

AQMD's Headquarters located at 21865 Copley Drive, Diamond Bar, California 91765 consists of four interconnected buildings designated as the North Office Tower, South Office Tower, Laboratory and Conference Center/Cafeteria.

This project is scheduled to begin January 2013. The work will consist of replacing black steel pipe with a combination of metallic and/or non-metallic piping, replacing all gate valves with new ball and/or butterfly valves, and insulating the piping.

**SECTION II: CONTACT PERSON:**

Questions regarding the content or intent of this RFP or on procedural matters should be addressed to:

Bruce Jacobson  
Building Maintenance Manager  
SCAQMD  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-2289  
bjacobson@aqmd.gov

**SECTION III: SCHEDULE OF EVENTS**

September 07, 2012	Release of RFP
September 21, 2012	Mandatory Bidders Conference
October 09, 2012	RFP Closes, 2:00 P.M.
October 10 – October 19, 2012	Proposal Evaluation
December 07, 2012	Governing Board Approval
December 21, 2012	Anticipated Contract Execution

**MANDATORY BIDDER’S CONFERENCE - A bidder’s conference will be held on:**

Date: September 21, 2012 Time: 10:00 AM  
Location: 21865 Copley Dr – Room CC2  
Diamond Bar, CA 91765

Those interested in participating must make reservations to attend the Mandatory Bidder’s Conference by calling Verna Negrete at (909) 396-2807. **Proposals will not be accepted from businesses that do not send an authorized representative to the mandatory bidder’s conference.**

**SECTION IV: PARTICIPATION IN THE PROCUREMENT PROCESS**

A. It is the policy of the South Coast Air Quality Management District to ensure that all businesses including minority business enterprises, women business enterprises, disabled veteran business enterprises and small businesses have a fair and equitable opportunity to compete for and participate in AQMD contracts.

B. Definitions:

The definition of minority, women or disadvantaged business enterprises set forth below is included for purposes of determining compliance with the affirmative steps requirement described in Paragraph G below on procurements funded in whole or in part with federal

grant funds which involve the use of subcontractors. The definition provided for disabled veteran business enterprise, local business, small business enterprise, low-emission vehicle business and off-peak hours delivery business are provided for purposes of determining eligibility for point or cost considerations in the evaluation process.

1. "Women business enterprise" (WBE) as used in this policy means a business enterprise that meets all of the following criteria:
  - a. a business that is at least 51 percent owned by one or more women, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more women.
  - b. a business whose management and daily business operations are controlled by one or more women.
  - c. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.
2. "Disabled veteran" as used in this policy is a United States military, naval, or air service veteran with at least 10 percent service-connected disability who is a resident of California.
3. "Disabled veteran business enterprise" (DVBE) as used in this policy means a business enterprise that meets all of the following criteria:
  - a. is a sole proprietorship or partnership of which at least 51 percent is owned by one or more disabled veterans or, in the case of a publicly owned business, at least 51 percent of its stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
  - b. the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.
  - c. is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.
4. "Local business" as used in this policy means a company that has an ongoing business within the South Coast AQMD at the time of bid or proposal submittal and performs 90% of the work related to the contract within the South Coast AQMD and satisfies the requirements of subparagraph H below.

5. "Small business" as used in this policy means a business that meets the following criteria:
  - a. 1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:
    - A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or
    - A manufacturer with 100 or fewer employees.
  - b. Manufacturer means a business that is both of the following:
    - 1) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
    - 2) Classified between Codes 311000 and 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.
6. "Joint ventures" as defined in this policy pertaining to certification means that one party to the joint venture is a DVBE or small business and owns at least 51 percent of the joint venture.
7. "Low-Emission Vehicle Business" as used in this policy means a company or contractor that uses low-emission vehicles in conducting deliveries to the AQMD. Low-emission vehicles include vehicles powered by electric, compressed natural gas (CNG), liquefied natural gas (LNG), liquefied petroleum gas (LPG), ethanol, methanol, hydrogen and diesel retrofitted with particulate matter (PM) traps.
8. "Off-Peak Hours Delivery Business" as used in this policy means a company or contractor that commits to conducting deliveries to the AQMD during off-peak traffic hours defined as between 10:00 a.m. and 3:00 p.m.
9. "Benefits Incentive Business" as used in this policy means a company or contractor that provides janitorial, security guard or landscaping services to the AQMD and commits to providing employee health benefits (as defined below in Section VIII.D.2.d) for full time workers with affordable deductible and co-payment terms.
10. "Minority Business Enterprise" as used in this policy means a business that is at least 51 percent owned by one or more minority person(s), or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more or minority persons.
  - a. a business whose management and daily business operations are controlled by one or more minority persons.
  - b. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.



c. "Minority person" for purposes of this policy, means a Black American, Hispanic American, Native-American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian (including a person whose origins are from India, Pakistan, and Bangladesh), Asian-Pacific-American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, and Taiwan).

11. Disadvantaged Business Enterprise" as used in this policy means a business that is an entity owned and/or controlled by a socially and economically disadvantaged individual(s) as described by Title X of the Clean Air Act Amendments of 1990 (42 U.S.C. 7601 note) (10% statute), and Public Law 102-389 (42 U.S.C. 4370d)(8% statute), respectively;  
a Small Business Enterprise (SBE);  
a Small Business in a Rural Area (SBRA);  
a Labor Surplus Area Firm (LSAF); or  
a Historically Underutilized Business (HUB) Zone Small Business Concern, or a concern under a successor program.

- C. Under Request for Quotations (RFQ), DVBEs, DVBE business joint ventures, small businesses, and small business joint ventures shall be granted a preference in an amount equal to 5% of the lowest cost responsive bid. Low-Emission Vehicle Businesses shall be granted a preference in an amount equal to 5 percent of the lowest cost responsive bid. Off-Peak Hours Delivery Businesses shall be granted a preference in an amount equal to 2 percent of the lowest cost responsive bid. Local businesses (if the procurement is not funded in whole or in part by federal grant funds) shall be granted a preference in an amount equal to 2% of the lowest cost responsive bid.
- D. Under Request for Proposals, DVBEs, DVBE joint ventures, small businesses, and small business joint ventures shall be awarded ten (10) points in the evaluation process. A non-DVBE or large business shall receive seven (7) points for subcontracting at least twenty-five (25%) of the total contract value to a DVBE and/or small business. Low-Emission Vehicle Businesses shall be awarded five (5) points in the evaluation process. On procurements which are not funded in whole or in part by federal grant funds local businesses shall receive five (5) points. Off-Peak Hours Delivery Businesses shall be awarded two (2) points in the evaluation process.
- E. AQMD will ensure that discrimination in the award and performance of contracts does not occur on the basis of race, color, sex, national origin, marital status, sexual preference, creed, ancestry, medical condition, or retaliation for having filed a discrimination complaint in the performance of AQMD contractual obligations.
- F. AQMD requires Contractor to be in compliance with all state and federal laws and regulations with respect to its employees throughout the term of any awarded contract, including state minimum wage laws and OSHA requirements.
- G. When contracts are funded in whole or in part by federal funds, and if subcontracts are to be let, the Contractor must comply with the following, evidencing a good faith effort to solicit disadvantaged businesses. Contractor shall submit a certification signed by an authorized official affirming its status as a MBE or WBE, as applicable, at the time of contract execution. The AQMD reserves the right to request documentation demonstrating compliance with the following good faith efforts prior to contract execution.

1. Ensure Disadvantaged Business Enterprises (DBEs) are made aware of contracting opportunities to the fullest extent practicable through outreach and recruitment activities. For Indian Tribal, State and Local Government recipients, this will include placing DBEs on solicitation lists and soliciting them whenever they are potential sources.
  2. Make information on forthcoming opportunities available to DBEs and arrange time frames for contracts and establish delivery schedules, where the requirements permit, in a way that encourages and facilitates participation by DBEs in the competitive process. This includes, whenever possible, posting solicitations for bids or proposals for a minimum of 30 calendar days before the bid or proposal closing date.
  3. Consider in the contracting process whether firms competing for large contracts could subcontract with DBEs. For Indian Tribal, State and Local Government recipients, this will include dividing total requirements when economically feasible into smaller tasks or quantities to permit maximum participation by DBEs in the competitive process.
  4. Encourage contracting with a consortium of DBEs when a contract is too large for one of these firms to handle individually.
  5. Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
  6. If the prime contractor awards subcontracts, require the prime contractor to take the above steps.
- H. To the extent that any conflict exists between this policy and any requirements imposed by federal and state law relating to participation in a contract by a certified MBE/WBE/DVBE as a condition of receipt of federal or state funds, the federal or state requirements shall prevail.
- I. When contracts are not funded in whole or in part by federal grant funds, a local business preference will be awarded. For such contracts that involve the purchase of commercial off-the-shelf products, local business preference will be given to suppliers or distributors of commercial off-the-shelf products who maintain an ongoing business within the geographical boundaries of the AQMD. However, if the subject matter of the RFP or RFQ calls for the fabrication or manufacture of custom products, only companies performing 90% of the manufacturing or fabrication effort within the geographical boundaries of the AQMD shall be entitled to the local business preference.
- J. In compliance with federal fair share requirements set forth in 40 CFR 35.6580, the AQMD shall establish a fair share goal annually for expenditures covered by its procurement policy.

## **SECTION V: STATEMENT OF WORK & SCHEDULE OF DELIVERABLES**

### A. Statement of Work

(See ATTACHMENT A - STATEMENT OF WORK)

### B. Schedule of Deliverable

AQMD Diamond Bar Headquarters currently have isolated areas of degrading black steel pipe from ½ inch to 6 inch needing replacement. This project is scheduled to begin January 2013. The work will consist of replacing black steel pipe with metallic and/or non-metallic piping, replacing all valves with new ball and/or butterfly valves, and re-insulating all new piping.

## **SECTION VI: REQUIRED QUALIFICATIONS**

- A. AQMD will enter into a contract with a licensed C-4 or C-36 contractor only. Should the contractor substitute a subcontractor for any of the responsibilities or obligations covered under this contract without the AQMD's prior written approval, such substitution will be grounds for termination of the prime contract.
- B. Contractor must provide evidence of all current licensing, insurance, and permits required by local, State, and Federal regulations for providing services as described in:

ATTACHMENT A - STATEMENT OF WORK

- C. Contractor shall furnish evidence of Workers Compensation insurance in accordance with the State of California statutory requirements, general liability insurance, and automobile liability insurance in accordance with provision 6 of the attached Draft Contract.

## **SECTION VII: PROPOSAL SUBMITTAL REQUIREMENTS**

Proposals must be submitted according to specifications set forth in this RFP. *It is the responsibility of each bidder to frequently check the Districts web site at [aqmd.gov/employment/business\\_opportunities/business\\_opportunities](http://aqmd.gov/employment/business_opportunities/business_opportunities) for all RFP updates and addendums.*

Failure to adhere to these specifications may be cause for rejection of proposal.

Signature – Proposals must be signed by an authorized representative of the proposer.

Due Date – The proposer shall submit five (5) complete copies of the proposal in a sealed envelope, plainly marked in the upper left-hand corner with the name and address of the Proposer and the words "Request for Proposals #P2013-04." All proposals are **due no later than 2:00 pm**, October 09, 2012, and should be directed to:

Procurement Unit  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-3520

**PROPOSALS WILL NOT BE ACCEPTED FROM ANY BUSINESS THAT DID NOT HAVE AN AUTHORIZED REPRESENTATIVE IN ATTENDANCE AT THE MANDATORY BIDDER'S CONFERENCE.**

**Late bids/proposals will not be accepted under any circumstances.** Any correction or resubmission done by the Proposer will not extend the submittal due date.

**Grounds for Rejection - A proposal may be immediately rejected if:**

- **It is not prepared in the format described, or**
- **It is signed by an individual not authorized to represent the firm.**

Disposition of Proposals - AQMD reserves the right to reject any or all proposals. All responses become the property of AQMD. One copy of the proposal shall be retained for AQMD files. Additional copies and materials will be returned only if requested and at the proposer's expense.

Modification or Withdrawal - Once submitted, proposals cannot be altered without the prior written consent of AQMD. All proposals shall constitute firm offers and may not be withdrawn for a period of ninety (90) days following the last day to accept proposals.

Format – The content and format of the proposal must adhere to the following specifications. Failure to follow this form may result in disqualification.

1. A cover letter must include the name, address, telephone number, e-mail address, and fax number (if applicable) of the contractor. The letter must include the name, title, and telephone number of the firm's designated contact person and must be signed by the person or person's authorized to submit a response for the firm.
2. Proposer shall state in outline or letter form their overall approach to meeting the objectives and satisfying the scope of work as set forth in attachment "A" to be performed and the length of time your company has been providing such services. Describe any training your company provides its staff.
3. Cost Proposal Sheet in Section VIII, References in Section X, and Certification and Representations forms in attachment "B" must be completed.
4. Include any certification of local business, DVBE, Low-Emission Vehicle Business and/or Small Business status, if applicable.
5. Include evidence of valid licensing and permits to perform the services required in this RFP.
6. Include evidence of required insurance as detailed in provision 6 of attached draft contract.
7. Include any brochure(s) or evidence of organizations or associations that your company is affiliated with which would be applicable to this RFP.
8. List any current agreement with the federal government, the State of California, Los Angeles, Orange, San Bernardino, Riverside Counties or other governmental agencies, if applicable.
9. **Submit five (5) complete copies of your response**

**SECTION VII: PROPOSAL EVALUATION/CONTRACTOR SELECTION CRITERIA**

- A. Proposals will be evaluated by a panel of three to five AQMD staff members familiar with the subject matter of the project. The panel shall be appointed by the Executive Officer or his designee. In addition, the evaluation panel may include such outside public sector or community expertise as deemed desirable by the Executive Officer. The panel will make a recommendation to the Executive Officer and/or the Governing Board of the AQMD for final selection of a contractor and negotiation of a contract.
- B. Each member of the evaluation panel shall be accorded equal weight in his or her rating of proposals. The evaluation panel members shall evaluate the proposals according to the specified criteria and numerical weightings set forth below.

**1. Evaluation Criteria**

(a) <u>Standardized Services</u>	<u>Points</u>
Understanding of Requirements	20
Contractor Qualifications	20
Past Experience	10
Cost	<u>50</u>
TOTAL:	100

(b) <u>Additional Points</u>	
Small Business or Small Business Joint Venture	10
DVBE or DVBE Joint Venture	10
Use of DVBE or Small Business Subcontractors	7
Low-Emission Vehicle Business	5
Local Business (Non-Federally Funded Projects Only)	5
Off-Peak Hours Delivery Business	2

**The cumulative points awarded for small business, DVBE, use of small business or DVBE subcontractors, low-emission vehicle business, local business, and off-peak hours delivery business shall not exceed 15 points.**

**Note: The award of these additional points shall be contingent upon Proposer completing the Self-Certification section of Attachment A – Certifications and Representations and/or inclusion of a statement in the proposal self-certifying that Proposer qualifies for additional points as detailed above.**

2. To receive additional points in the evaluation process for the categories of Small Business or Small Business Joint Venture, DVBE or DVBE Joint Venture or Local Business (for federal funded projects), the proposer must submit a self-certification or certification from the State of California Office of Small Business Certification and Resources at the time of proposal submission certifying that the proposer meets the requirements set forth in Section III. To receive points for the use of DVBE and/or Small Business subcontractors, at least 25 percent of the total contract value must be subcontracted to DVBEs and/or Small Businesses. To receive points as a Low-Emission Vehicle Business, the proposer must demonstrate to the Executive Officer, or designee, that supplies and materials delivered to the AQMD are delivered in vehicles that operate on either clean-fuels or if powered by diesel fuel, that the vehicles have particulate traps installed. To receive points as an Off-Peak Hours Delivery Business, the proposer must submit, at proposal submission, certification of its commitment to delivering supplies and materials to AQMD between the hours of 10:00 a.m. and 3:00 p.m. The cumulative points awarded for small business, DVBE, use of Small Business or DVBE Subcontractors, Local Business, Low-Emission Vehicle Business and Off-Peak Hour Delivery Business shall not exceed 15 points.

The Procurement Section will be responsible for monitoring compliance of suppliers awarded purchase orders based upon use of low-emission vehicles or off-peak traffic hour delivery commitments through the use of vendor logs which will identify the contractor awarded the incentive. The purchase order shall incorporate terms which obligate the supplier to deliver materials in low-emission vehicles or deliver during off-peak traffic hours. The Receiving department will monitor those qualified supplier deliveries to ensure compliance to the purchase order requirements. Suppliers in non-compliance will be subject to a two percent of total purchase order value penalty. The Procurement Manager will adjudicate any disputes regarding either low-emission vehicle or off-peak hour deliveries.

3. The lowest cost proposal will be awarded the maximum cost points available and all other cost proposals will receive points on a prorated basis. For example if the lowest cost proposal is \$1,000 and the maximum points available are 30 points, this proposal would receive the full 30 points. If the next lowest cost proposal is \$1,100 it would receive 27 points reflecting the fact that it is 10% higher than the lowest cost (90% of 30 points = 27 points).
- C. During the selection process the evaluation panel may wish to interview some proposers for clarification purposes only. No new material will be permitted at this time. The Executive Officer or Governing Board may award the contract to a proposer other than the proposer receiving the highest rating in the event the Governing Board determines that another proposer from among those technically qualified would provide the best value to AQMD considering cost and technical factors. The determination shall be based solely on the Evaluation Criteria contained in the Request for Proposal (RFP), on evidence provided in the proposal and on any other evidence provided during the bid review process. Evidence provided during the bid review process is limited to clarification by the Proposer of information presented in his/her proposal.

- D. Selection will be made based on the above-described criteria and rating factors. The selection will be made by and is subject to Executive Officer or Governing Board approval. All proposers will be notified of the results by letter.
- E. The Executive Officer or Governing Board may award contracts to more than one proposer if in (his or their) sole judgment the purposes of the (contract or award) would best be served by selecting multiple proposers.
- F. The Governing Board has approved a Bid Protest Procedure which provides a process for a bidder or prospective bidder to submit a written protest to the AQMD Procurement Manager in recognition of two types of protests: Protest Regarding Solicitation and Protest Regarding Award of a Contract. Copies of the Bid Protest Policy can be secured through a request to the AQMD Procurement Department.
- G. If additional funds become available, the Executive Officer or Governing Board may increase the amount awarded. The Executive Officer or Governing Board may also select additional proposers for a grant or contract if additional funds become available.
- H. Upon mutual agreement of the parties of any resultant contract from this RFP, the original contract term may be extended.

## COST PROPOSAL

### SECTION VIII:

Please fill in the following cost breakdown. Include any other costs that may not be listed, in order to provide an accurate total bid amount.

DESCRIPTION	UNIT COST	TOTAL COST
a. Demo and disposal of existing black steel pipe and insulation		
b. Supply and install approximately 48 lf of 1/2" copper pipe		
c. Supply and install approximately 120 lf of 3/4" copper pipe		
d. Supply and install approximately 620 lf of 1" copper pipe		
e. Supply and install approximately 980 lf of 1 1/4" copper or non-metallic pipe		
f. Supply and install approximately 150 lf of 1 1/2" copper or non-metallic pipe		
g. Supply and install approximately 1,400 lf of 2" copper or non-metallic pipe		
h. Supply and install approximately 550 lf of 3" copper or non-metallic pipe		
i. Supply and install approximately 2,420 lf of 4" copper or non-metallic pipe		
j. Supply and install approximately 630 lf of 6" copper or non-metallic pipe		
k. Supply and install new pipe insulation		
l. Supply and install 2 new 6" flanged check valves		
m. Supply and install 1 new 6" flanged strainer		
n. Supply and install 4 new 6" lug style butterfly valves		
o. Supply and install 2 new 4" flanged check valves		
p. Supply and install approximately 14 new 4" lug style butterfly valves		
q. Supply and install approximately 18 new 3" lug style butterfly valves		



r. Supply and install approximately 4 new 2 1/2" lug style butterfly valves		
s. Supply and install approximately 2 new 2" strainers		
t. Supply and install approximately 2 new 2" check valves		
u. Supply and install approximately 23 new 2" ball valves		
v. Supply and install approximately 12 new 1 1/2" check valves		
w. Supply and install approximately 6 new 1 1/2" strainers		
x. Supply and install approximately 15 new 1 1/2" ball valves		
y. Supply and install approximately 6 new 1 1/4" ball valves		
z. Supply and install approximately 22 new 1" ball valves		
aa. Supply and install approximately 40 new 3/4" ball valves		
ab. Supply and install approximately 22 new 1/2" ball valves		
Any and all additional costs – (e.g., permits, licenses, trash containers, disposal fees, rental equipment, etc., if not included above.		
<b>Total Cost ( all inclusive)</b>		

Labor Rate per hour Journeyman	\$
Labor Rate per hour Apprentice	\$

October 09, 2012

To: South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765  
Attention: Procurement Department

**SUBJECT:** Replacement of HVAC Black Steel Piping

Based on the cost breakdown provided above, the undersigned, having carefully examined AQMD's specification attached hereto, hereby propose and agrees to furnish all necessary labor, materials, equipment, and any other incidentals necessary to replacement of HVAC black steel piping in strict conformity with AQMD's specification for the stipulated sum of:

\$ \_\_\_\_\_  
\_\_\_\_\_ Dollars \_\_\_\_\_

The above pricing is all inclusive. If this proposal is accepted by AQMD, the undersigned agrees to execute a contract for work to be accomplished under this proposal and to provide evidence of required workers' compensation insurance and general and auto liability insurance as described in provision 6 of the attached draft contract.

Proposer's Name: \_\_\_\_\_

Proposers Address: \_\_\_\_\_

Authorized Signature: \_\_\_\_\_

Title: \_\_\_\_\_

**SECTION X: REFERENCES**

Please provide information on five clients for whom your company provided services, within the past three years, which are similar in scope and size to those described in this RFP so we may contact them for references.

- 1. Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Contact Person: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Contract Amount: \_\_\_\_\_
  
- 2. Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Contact Person: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Contract Amount: \_\_\_\_\_
  
- 3. Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Contact Person: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Contract Amount: \_\_\_\_\_
  
- 4. Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Contact Person: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Contract Amount: \_\_\_\_\_
  
- 5. Company Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Contact Person: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Contract Amount: \_\_\_\_\_

**SECTION XI: DRAFT CONTRACT (Provided as a sample only)**



**South Coast  
Air Quality Management District**

1. PARTIES - The parties to this Contract are the South Coast Air Quality Management District (referred to here as "AQMD") whose address is 21865 Copley Drive, Diamond Bar, California 91765-4178, and \*\*\* (referred to here as "CONTRACTOR") whose address is \*\*\*.
  
2. RECITALS
  - A. AQMD is the local agency with primary responsibility for regulating stationary source air pollution in the South Coast Air Basin in the State of California. AQMD is authorized to enter into this Contract under California Health and Safety Code Section 40489. AQMD desires to contract with CONTRACTOR for services described in Attachment 1 - Statement of Work, attached here and made a part here by this reference. CONTRACTOR warrants that it is well-qualified and has the experience to provide such services on the terms set forth here.
  - B. CONTRACTOR is authorized to do business in the State of California and attests that it is in good tax standing with the California Franchise Tax Board.
  - C. All parties to this Contract have had the opportunity to have this Contract reviewed by their attorney.
  - D. CONTRACTOR agrees to obtain the required licenses, permits, and all other appropriate legal authorizations from all applicable federal, state and local jurisdictions and pay all applicable fees.
  
3. PERFORMANCE REQUIREMENTS
  - A. CONTRACTOR warrants that it holds all necessary and required licenses and permits to provide these services. CONTRACTOR further agrees to immediately notify AQMD in writing of any change in its licensing status.
  - B. CONTRACTOR shall submit reports to AQMD as outlined in Attachment 1 - Statement of Work. All reports shall be submitted in an environmentally friendly format: recycled paper; stapled, not bound; black and white, double-sided print; and no three-ring, spiral, or plastic binders or cardstock covers. AQMD reserves the right to review, comment, and request changes to any report produced as a result of this Contract.
  - C. CONTRACTOR shall perform all tasks set forth in Attachment 1 - Statement of Work, and shall not engage, during the term of this Contract, in any performance of work that is in direct or indirect conflict with duties and responsibilities set forth in Attachment 1 - Statement of Work.
  - D. CONTRACTOR shall be responsible for exercising the degree of skill and care customarily required by accepted professional practices and procedures subject to AQMD's final approval which AQMD will not unreasonably withhold. Any costs incurred due to the failure to meet the foregoing standards, or otherwise defective services which require re-performance, as directed by AQMD, shall be the responsibility of CONTRACTOR. CONTRACTOR's failure to achieve the performance goals and objectives stated in Attachment 1- Statement of Work, is not a basis for requesting re-performance unless work conducted by CONTRACTOR is deemed by AQMD to have failed the foregoing standards of performance.
  - E. CONTRACTOR shall post a performance bond in the amount of \*\*\* Dollars (\$\*\*\*) from a surety authorized to issue such bonds within the State. **[USE IF REQUIRED]**
  - F. AQMD has the right to review the terms and conditions of the performance bond and to request modifications thereto which will ensure that AQMD will be compensated in the event CONTRACTOR fails to

perform and also provides AQMD with the opportunity to review the qualifications of the entity designated by the issuer of the performance bond to perform in CONTRACTOR's absence and, if necessary, the right to reject such entity. [USE IF REQUIRED]

G. CONTRACTOR shall ensure, through its contracts with any subcontractor(s), that employees and agents performing under this Contract shall abide by the requirements set forth in this clause.

4. TERM - The term of this Contract is from the date of execution by both parties (or insert date) to \*\*\*, unless further extended by amendment of this Contract in writing. No work shall commence until this Contract is fully executed by all parties.

5. TERMINATION

A. In the event any party fails to comply with any term or condition of this Contract, or fails to provide services in the manner agreed upon by the parties, including, but not limited to, the requirements of Attachment 1 – Statement of Work, this failure shall constitute a breach of this Contract. The non-breaching party shall notify the breaching party that it must cure this breach or provide written notification of its intention to terminate this contract. Notification shall be provided in the manner set forth in Clause 11. The non-breaching party reserves all rights under law and equity to enforce this contract and recover damages.

B. AQMD reserves the right to terminate this Agreement, in whole or in part, without cause, upon thirty (30) days' written notice. Once such notice has been given, CONTRACTOR shall, except as and to the extent or directed otherwise by AQMD, discontinue any Work being performed under this Agreement and cancel any of CONTRACTOR's orders for materials, facilities, and supplies in connection with such Work, and shall use its best efforts to procure termination of existing subcontracts upon terms satisfactory to AQMD. Thereafter, CONTRACTOR shall perform only such services as may be necessary to preserve and protect any Work already in progress and to dispose of any property as requested by AQMD.

C. CONTRACTOR shall be paid in accordance with this Agreement for all work performed before the effective date of termination under Clause 5.B. Before expiration of the thirty (30) days' written notice, CONTRACTOR shall promptly deliver to AQMD all copies of documents and other information and data prepared or developed by CONTRACTOR under this Agreement with the exception of a record copy of such materials, which may be retained by CONTRACTOR.

6. INSURANCE

A. CONTRACTOR shall furnish evidence to AQMD of workers' compensation insurance for each of its employees, in accordance with either California or other states' applicable statutory requirements prior to commencement of any work on this Contract.

B. CONTRACTOR shall furnish evidence to AQMD of general liability insurance with a limit of at least \$1,000,000 per occurrence, and \$2,000,000 in a general aggregate prior to commencement of any work on this Contract. AQMD shall be named as an additional insured on any such liability policy, and thirty (30) days written notice prior to cancellation of any such insurance shall be given by CONTRACTOR to AQMD.

C. CONTRACTOR shall furnish evidence to AQMD of automobile liability insurance with limits of at least \$100,000 per person and \$300,000 per accident for bodily injuries, and \$50,000 in property damage, or \$1,000,000 combined single limit for bodily injury or property damage, prior to commencement of any work on this Contract. AQMD shall be named as an additional insured on any such liability policy, and thirty (30) days written notice prior to cancellation of any such insurance shall be given by CONTRACTOR to AQMD.

D. CONTRACTOR shall furnish evidence to AQMD of Professional Liability Insurance with an aggregate limit of not less than \$5,000,000. [OPTIONAL FOR PROFESSIONAL SERVICES]

- E. If CONTRACTOR fails to maintain the required insurance coverage set forth above, AQMD reserves the right either to purchase such additional insurance and to deduct the cost thereof from any payments owed to CONTRACTOR or terminate this Contract for breach.
  - F. All insurance certificates should be mailed to: AQMD Risk Management, 21865 Copley Drive, Diamond Bar, CA 91765-4178. **The AQMD Contract Number must be included on the face of the certificate.**
  - G. CONTRACTOR must provide updates on the insurance coverage throughout the term of the Contract to ensure that there is no break in coverage during the period of contract performance. Failure to provide evidence of current coverage shall be grounds for termination for breach of Contract.
7. **INDEMNIFICATION** - CONTRACTOR agrees to hold harmless and indemnify AQMD, its officers, employees, agents, representatives, and successors-in-interest against any and all loss, damage, cost, lawsuits, demands, judgments, legal fees or any other expenses which AQMD, its officers, employees, agents, representatives, and successors-in-interest may incur or be required to pay by reason of any injury or property damage arising from the negligent or intentional conduct or omission of CONTRACTOR, its employees, its subcontractors, or its agents in the performance of this Contract.
8. **CO-FUNDING [USE IF REQUIRED]**
- A. CONTRACTOR shall obtain co-funding as follows: \*\*\* , \*\*\* Dollars (\$\*\*\*); \*\*\* , \*\*\* Dollars (\$\*\*\*); \*\*\* , \*\*\* Dollars (\$\*\*\*); \*\*\* , \*\*\* Dollars (\$\*\*\*); \*\*\* , \*\*\* Dollars (\$\*\*\*); and \*\*\* , \*\*\* Dollars (\$\*\*\*).
  - B. If CONTRACTOR fails to obtain co-funding in the amount(s) referenced above, then AQMD reserves the right to renegotiate or terminate this Contract.
  - C. CONTRACTOR shall provide co-funding in the amount of \*\*\* Dollars (\$\*\*\*) for this project. If CONTRACTOR fails to provide this co-funding, then AQMD reserves the right to renegotiate or terminate this Contract.
9. **PAYMENT**  
**[FIXED PRICE]-use this one or the T&M one below.**
- A. AQMD shall pay CONTRACTOR a fixed price of \*\*\* Dollars (\$\*\*\*) for work performed under this Contract in accordance with Attachment 2 - Payment Schedule, attached here and included here by reference. Payment shall be made by AQMD to CONTRACTOR within thirty (30) days after approval by AQMD of an invoice prepared and furnished by CONTRACTOR showing services performed and referencing tasks and deliverables as shown in Attachment 1 - Statement of Work, and the amount of charge claimed. Each invoice must be prepared in duplicate, on company letterhead, and list AQMD's Contract number, period covered by invoice, and CONTRACTOR's social security number or Employer Identification Number and submitted to: South Coast Air Quality Management District, Attn: \*\*\*.
  - B. An amount equal to ten percent (10%) shall be withheld from all charges paid until satisfactory completion and final acceptance of work by AQMD. **[OPTIONAL]**
  - C. AQMD reserves the right to disallow charges when the invoiced services are not performed satisfactorily in AQMD sole judgment.
- [T & M]-use this one or the Fixed Price one above.**
- A. AQMD shall pay CONTRACTOR a total not to exceed amount of \*\*\* Dollars (\$\*\*\*), including any authorized travel-related expenses, for time and materials at rates in accordance with Attachment 2 – Cost Schedule, attached here and included here by this reference. Payment of charges shall be made by AQMD to CONTRACTOR within thirty (30) days after approval by AQMD of an itemized invoice prepared and furnished by CONTRACTOR referencing line item expenditures as listed in Attachment 2 and the amount of charge claimed. Each invoice must be prepared in duplicate, on company letterhead, and list AQMD's

Contract number, period covered by invoice, and CONTRACTOR's social security number or Employer Identification Number and submitted to: South Coast Air Quality Management District, Attn: \*\*\*.

- B. CONTRACTOR shall adhere to total tasks and/or cost elements (cost category) expenditures as listed in Attachment 2. Reallocation of costs between tasks and/or cost category expenditures is permitted up to One Thousand Dollars (\$1,000) upon prior written approval from AQMD. Reallocation of costs in excess of One Thousand Dollars (\$1,000) between tasks and/or cost category expenditures requires an amendment to this Contract.
  - C. AQMD's payment of invoices shall be subject to the following limitations and requirements:
    - i) Charges for equipment, material, and supply costs, travel expenses, subcontractors, and other charges, as applicable, must be itemized by CONTRACTOR. Reimbursement for equipment, material, supplies, subcontractors, and other charges shall be made at actual cost. Supporting documentation must be provided for all individual charges (with the exception of direct labor charges provided by CONTRACTOR). AQMD's reimbursement of travel expenses and requirements for supporting documentation are listed below.
    - ii) CONTRACTOR's failure to provide receipts shall be grounds for AQMD's non-reimbursement of such charges. AQMD may reduce payments on invoices by those charges for which receipts were not provided.
    - iii) AQMD shall not pay interest, fees, handling charges, or cost of money on Contract.
  - D. AQMD shall reimburse CONTRACTOR for travel-related expenses only if such travel is expressly set forth in Attachment 2 – Cost Schedule of this Contract or pre-authorized by AQMD in writing.
    - i) AQMD's reimbursement of travel-related expenses shall cover lodging, meals, other incidental expenses, and costs of transportation subject to the following limitations:
      - Air Transportation - Coach class rate for all flights. If coach is not available, business class rate is permissible.
      - Car Rental - A compact car rental. A mid-size car rental is permissible if car rental is shared by three or more individuals.
      - Lodging - Up to One Hundred Fifty Dollars (\$150) per night. A higher amount of reimbursement is permissible if pre-approved by AQMD.
      - Meals - Daily allowance is Fifty Dollars (\$50.00).
        - ii) Supporting documentation shall be provided for travel-related expenses in accordance with the following requirements:
          - Lodging, Airfare, Car Rentals - Bill(s) for actual expenses incurred.
          - Meals - Meals billed in excess of \$50.00 each day require receipts or other supporting documentation for the total amount of the bill and must be approved by AQMD.
          - Mileage - Beginning each January 1, the rate shall be adjusted effective February 1 by the Chief Financial Officer based on the Internal Revenue Service Standard Mileage Rate
          - Other travel-related expenses - Receipts are required for all individual items.
  - E. AQMD reserves the right to disallow charges when the invoiced services are not performed satisfactorily in AQMD sole judgment.
10. INTELLECTUAL PROPERTY RIGHTS - Title and full ownership rights to any software, documents, or reports developed under this Contract shall at all times remain with AQMD. Such material is agreed to be AQMD proprietary information.
- A. Rights of Technical Data - AQMD shall have the unlimited right to use technical data, including material designated as a trade secret, resulting from the performance of services by CONTRACTOR under this Contract. CONTRACTOR shall have the right to use technical data for its own benefit.
  - B. Copyright - CONTRACTOR agrees to grant AQMD a royalty-free, nonexclusive, irrevocable license to produce, translate, publish, use, and dispose of all copyrightable material first produced or composed in the performance of this Contract.

11. NOTICES - Any notices from either party to the other shall be given in writing to the attention of the persons listed below, or to other such addresses or addressees as may hereafter be designated in writing for notices by either party to the other. Notice shall be given by certified, express, or registered mail, return receipt requested, and shall be effective as of the date of receipt indicated on the return receipt card.

AQMD: South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
Attn: \*\*\*

CONTRACTOR: \*\*\*  
\*\*\*  
\*\*\*  
Attn: \*\*\*

12. EMPLOYEES OF CONTRACTOR

- A. AQMD reserves the right to review the resumes of any of CONTRACTOR employees, and/or any subcontractors selected to perform the work specified here and to disapprove CONTRACTOR choices. CONTRACTOR warrants that it will employ no subcontractor without written approval from AQMD. CONTRACTOR shall be responsible for the cost of regular pay to its employees, as well as cost of vacation, vacation replacements, sick leave, severance pay and pay for legal holidays.
- B. CONTRACTOR, its officers, employees, agents, representatives or subcontractors shall in no sense be considered employees or agents of AQMD, nor shall CONTRACTOR, its officers, employees, agents, representatives or subcontractors be entitled to or eligible to participate in any benefits, privileges, or plans, given or extended by AQMD to its employees.
- C. AQMD requires Contractor to be in compliance with all state and federal laws and regulations with respect to its employees throughout the term of this Contract, including state minimum wage laws and OSHA requirements.

13. CONFIDENTIALITY - It is expressly understood and agreed that AQMD may designate in a conspicuous manner the information which CONTRACTOR obtains from AQMD as confidential. CONTRACTOR agrees to:

- A. Observe complete confidentiality with respect to such information, including without limitation, agreeing not to disclose or otherwise permit access to such information by any other person or entity in any manner whatsoever, except that such disclosure or access shall be permitted to employees or subcontractors of CONTRACTOR requiring access in fulfillment of the services provided under this Contract.
- B. Ensure that CONTRACTOR's officers, employees, agents, representatives, and independent contractors are informed of the confidential nature of such information and to assure by agreement or otherwise that they are prohibited from copying or revealing, for any purpose whatsoever, the contents of such information or any part thereof, or from taking any action otherwise prohibited under this clause.
- C. Not use such information or any part thereof in the performance of services to others or for the benefit of others in any form whatsoever whether gratuitously or for valuable consideration, except as permitted under this Contract.
- D. Notify AQMD promptly and in writing of the circumstances surrounding any possession, use, or knowledge of such information or any part thereof by any person or entity other than those authorized by this clause.
- E. Take at CONTRACTOR expense, but at AQMD's option and in any event under AQMD's control, any legal action necessary to prevent unauthorized use of such information by any third party or entity which has gained access to such information at least in part due to the fault of CONTRACTOR.



- F. Take any and all other actions necessary or desirable to assure such continued confidentiality and protection of such information.
- G. Prevent access to such information by any person or entity not authorized under this Contract.
- H. Establish specific procedures in order to fulfill the obligations of this clause.
- I. Notwithstanding the above, nothing herein is intended to abrogate or modify the provisions of Government Code Section 6250 et.seq. (Public Records Act).

14. PUBLICATION

- A. AQMD shall have the right of prior written approval of any document which shall be disseminated to the public by CONTRACTOR in which CONTRACTOR utilized information obtained from AQMD in connection with performance under this Contract.
- B. Information, data, documents, or reports developed by CONTRACTOR for AQMD, pursuant to this Contract, shall be part of AQMD public record unless otherwise indicated. CONTRACTOR may use or publish, at its own expense, such information provided to AQMD. The following acknowledgment of support and disclaimer must appear in each publication of materials, whether copyrighted or not, based upon or developed under this Contract.

"This report was prepared as a result of work sponsored, paid for, in whole or in part, by the South Coast Air Quality Management District (AQMD). The opinions, findings, conclusions, and recommendations are those of the author and do not necessarily represent the views of AQMD. AQMD, its officers, employees, contractors, and subcontractors make no warranty, expressed or implied, and assume no legal liability for the information in this report. AQMD has not approved or disapproved this report, nor has AQMD passed upon the accuracy or adequacy of the information contained herein."

- C. CONTRACTOR shall inform its officers, employees, and subcontractors involved in the performance of this Contract of the restrictions contained herein and require compliance with the above.

15. NON-DISCRIMINATION - In the performance of this Contract, CONTRACTOR shall not discriminate in recruiting, hiring, promotion, demotion, or termination practices on the basis of race, religious creed, color, national origin, ancestry, sex, age, or physical or mental disability and shall comply with the provisions of the California Fair Employment & Housing Act (Government Code Section 12900 et seq.), the Federal Civil Rights Act of 1964 (P.L. 88-352) and all amendments thereto, Executive Order No. 11246 (30 Federal Register 12319), and all administrative rules and regulations issued pursuant to said Acts and Order. CONTRACTOR shall likewise require each subcontractor to comply with this clause and shall include in each such subcontract language similar to this clause.

16. SOLICITATION OF EMPLOYEES - CONTRACTOR expressly agrees that CONTRACTOR shall not, during the term of this Contract, nor for a period of six months after termination, solicit for employment, whether as an employee or independent contractor, any person who is or has been employed by AQMD during the term of this Contract without the consent of AQMD.

17. PROPERTY AND SECURITY - Without limiting CONTRACTOR obligations with regard to security, CONTRACTOR shall comply with all the rules and regulations established by AQMD for access to and activity in and around AQMD premises.

18. ASSIGNMENT - The rights granted hereby may not be assigned, sold, licensed, or otherwise transferred by either party without the prior written consent of the other, and any attempt by either party to do so shall be void upon inception.

19. NON-EFFECT OF WAIVER - The failure of CONTRACTOR or AQMD to insist upon the performance of any or all of the terms, covenants, or conditions of this Contract, or failure to exercise any rights or remedies hereunder, shall not be construed as a waiver or relinquishment of the future performance of any such terms, covenants, or conditions, or of the future exercise of such rights or remedies, unless otherwise provided for herein.
20. ATTORNEYS' FEES - In the event any action is filed in connection with the enforcement or interpretation of this Contract, each party shall bear its own attorneys' fees and costs.
21. FORCE MAJEURE - Neither AQMD nor CONTRACTOR shall be liable or deemed to be in default for any delay or failure in performance under this Contract or interruption of services resulting, directly or indirectly, from acts of God, civil or military authority, acts of public enemy, war, strikes, labor disputes, shortages of suitable parts, materials, labor or transportation, or any similar cause beyond the reasonable control of AQMD or CONTRACTOR.
22. SEVERABILITY - In the event that any one or more of the provisions contained in this Contract shall for any reason be held to be unenforceable in any respect by a court of competent jurisdiction, such holding shall not affect any other provisions of this Contract, and the Contract shall then be construed as if such unenforceable provisions are not a part hereof.
23. HEADINGS - Headings on the clauses of this Contract are for convenience and reference only, and the words contained therein shall in no way be held to explain, modify, amplify, or aid in the interpretation, construction, or meaning of the provisions of this Contract.
24. DUPLICATE EXECUTION - This Contract is executed in duplicate. Each signed copy shall have the force and effect of an original.
25. GOVERNING LAW - This Contract shall be construed and interpreted and the legal relations created thereby shall be determined in accordance with the laws of the State of California. Venue for resolution of any disputes under this Contract shall be Los Angeles County, California.
26. CITIZENSHIP AND ALIEN STATUS
  - A. CONTRACTOR warrants that it fully complies with all laws regarding the employment of aliens and others, and that its employees performing services hereunder meet the citizenship or alien status requirements contained in federal and state statutes and regulations including, but not limited to, the Immigration Reform and Control Act of 1986 (P.L. 99-603). CONTRACTOR shall obtain from all covered employees performing services hereunder all verification and other documentation of employees' eligibility status required by federal statutes and regulations as they currently exist and as they may be hereafter amended. CONTRACTOR shall have a continuing obligation to verify and document the continuing employment authorization and authorized alien status of employees performing services under this Contract to insure continued compliance with all federal statutes and regulations.
  - B. Notwithstanding paragraph A above, CONTRACTOR, in the performance of this Contract, shall not discriminate against any person in violation of 8 USC Section 1324b.
  - C. CONTRACTOR shall retain such documentation for all covered employees for the period described by law. CONTRACTOR shall indemnify, defend, and hold harmless AQMD, its officers and employees from employer sanctions and other liability which may be assessed against CONTRACTOR or AQMD, or both in

connection with any alleged violation of federal statutes or regulations pertaining to the eligibility for employment of persons performing services under this Contract.

27. FEDERAL FAIR SHARE POLICY - As a recipient of Environmental Protection Agency (EPA) grant funds, AQMD is required to flow down to all of its contractors the provisions of 40 CFR Section 31.36(e) which addresses affirmative steps for contracting with small-and-minority firms, women's business enterprises, and labor surplus area firms. CONTRACTOR agrees to comply with these provisions.
28. REQUIREMENT FOR FILING STATEMENT OF ECONOMIC INTERESTS - In accordance with the Political Reform Act of 1974 (Government Code Sec. 81000 et seq.) and regulations issued by the Fair Political Practices Commission (FPPC), AQMD has determined that the nature of the work to be performed under this Contract requires CONTRACTOR to submit a Form 700, Statement of Economic Interests for Designated Officials and Employees, for each of its employees assigned to work on this Contract. These forms may be obtained from AQMD's District Counsel's office. **[USE IF REQUIRED]**
29. COMPLIANCE WITH SINGLE AUDIT ACT REQUIREMENTS **[OPTIONAL - TO BE INCLUDED IN CONTRACTS WITH FOR-PROFIT CONTRACTORS WHICH HAVE FEDERAL PASS-THROUGH FUNDING]** - During the term of the Contract, and for a period of three (3) years from the date of Contract expiration, and if requested in writing by the AQMD, CONTRACTOR shall allow the AQMD, its designated representatives and/or the cognizant Federal Audit Agency, access during normal business hours to all records and reports related to the work performed under this Contract. CONTRACTOR assumes sole responsibility for reimbursement to the Federal Agency funding the prime grant or contract, a sum of money equivalent to the amount of any expenditures disallowed should the AQMD, its designated representatives and/or the cognizant Federal Audit Agency rule through audit exception or some other appropriate means that expenditures from funds allocated to the CONTRACTOR were not made in compliance with the applicable cost principles, regulations of the funding agency, or the provisions of this Contract.

**[OPTIONAL - TO BE INCLUDED IN CONTRACTS WITH NON-PROFIT CONTRACTORS WHICH HAVE FEDERAL PASS-THROUGH FUNDING]** - Beginning with CONTRACTOR's current fiscal year and continuing through the term of this Contract, CONTRACTOR shall have a single or program-specific audit conducted in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-133 (Audits of States, Local Governments and Non-Profit Organizations), if CONTRACTOR expended Five Hundred Thousand Dollars (\$500,000) or more in a year in Federal Awards. Such audit shall be conducted by a firm of independent accountants in accordance with Generally Accepted Government Audit Standards (GAGAS). Within thirty (30) days of Contract execution, CONTRACTOR shall forward to AQMD the most recent A-133 Audit Report issued by its independent auditors. Subsequent A-133 Audit Reports shall be submitted to the AQMD within thirty (30) days of issuance.

CONTRACTOR shall allow the AQMD, its designated representatives and/or the cognizant Federal Audit Agency, access during normal business hours to all records and reports related to the work performed under this Contract. CONTRACTOR assumes sole responsibility for reimbursement to the Federal Agency funding the prime grant or contract, a sum of money equivalent to the amount of any expenditures disallowed should the AQMD, its designated representatives and/or the cognizant Federal Audit Agency rule through audit exception or some other appropriate means that expenditures from funds allocated to the CONTRACTOR were not made in compliance with the applicable cost principles, regulations of the funding agency, or the provisions of this Contract.

30. OPTION TO EXTEND THE TERM OF THE CONTRACT - AQMD reserves the right to extend the contract for a one-year period commencing \*\*\*\*\*(enter date) at the (option price or Not-to-Exceed Amount) set forth in Attachment 2. In the event that AQMD elects to extend the contract, a written notice of its intent to extend the contract shall be provided to CONTRACTOR no later than thirty (30) days prior to Contract expiration. [USE IF REQUIRED]
31. KEY PERSONNEL - *insert person's name* is deemed critical to the successful performance of this Contract. Any changes in key personnel by CONTRACTOR must be approved by AQMD. All substitute personnel must possess qualifications/experience equal to the original named key personnel and must be approved by AQMD. AQMD reserves the right to interview proposed substitute key personnel. [USE IF REQUIRED]
32. PREVAILING WAGES – [USE FOR INFRASTRUCTURE PROJECTS] CONTRACTOR is alerted to the prevailing wage requirements of California Labor Code section 1770 et seq. Copies of the prevailing rate of per diem wages are on file at the AQMD's headquarters, of which shall be made available to any interested party on request. Notwithstanding the preceding sentence, CONTRACTOR shall be responsible for determining the applicability of the provisions of California Labor Code and complying with the same, including, without limitation, obtaining from the Director of the Department of Industrial Relations the general prevailing rate of per diem wages and the general prevailing rate for holiday and overtime work, making the same available to any interested party upon request, paying any applicable prevailing rates, posting copies thereof at the job site and flowing all applicable prevailing wage rate requirements to its subcontractors. CONTRACTOR shall indemnify, defend and hold harmless the South Coast Air Quality Management District against any and all claims, demands, damages, defense costs or liabilities based on failure to adhere to the above referenced statutes.
33. APPROVAL OF SUBCONTRACT
- A. If CONTRACTOR intends to subcontract a portion of the work under this Contract, written approval of the terms of the proposed subcontract(s) shall be obtained from AQMD's Executive Officer or designee prior to execution of the subcontract. No subcontract charges will be reimbursed unless such approval has been obtained.
  - B. Any material changes to the subcontract(s) that affect the scope of work, deliverable schedule, and/or cost schedule shall also require the written approval of the Executive Officer or designee prior to execution.
  - C. The sole purpose of AQMD's review is to insure that AQMD's contract rights have not been diminished in the subcontractor agreement. AQMD shall not supervise, direct, or have control over, or be responsible for, subcontractor's means, methods, techniques, work sequences or procedures or for the safety precautions and programs incident thereto, or for any failure of subcontractor to comply with any local, state, or federal laws, or rules or regulations.
34. ENTIRE CONTRACT - This Contract represents the entire agreement between the parties hereto related to CONTRACTOR providing services to AQMD and there are no understandings, representations, or warranties of any kind except as expressly set forth herein. No waiver, alteration, or modification of any of the provisions herein shall be binding on any party unless in writing and signed by the party against whom enforcement of such waiver, alteration, or modification is sought.

IN WITNESS WHEREOF, the parties to this Contract have caused this Contract to be duly executed on their behalf by their authorized representatives.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT \*\*\*

By: \_\_\_\_\_ By: \_\_\_\_\_  
Barry R. Wallerstein, D.Env., Executive Officer Name:  
Dr. William A. Burke, Chairman, Governing Board Title:

Date: \_\_\_\_\_ Date: \_\_\_\_\_

ATTEST:  
Saundra McDaniel, Clerk of the Board

By: \_\_\_\_\_

APPROVED AS TO FORM:  
Kurt R. Wiese, General Counsel

By: \_\_\_\_\_

**ATTACHMENT 1**  
**WORK STATEMENT**

## Replacement of HVAC Black Steel Piping

### 1.00 General Requirements

1.01 **Scope of Work** – CONTRACTOR shall provide all labor, materials, permits, tools, equipment, and transportation required for the replacement of HVAC black steel piping located at 21865 Copley Dr., Diamond Bar, California. 91765. *It is the responsibility of the CONTRACTOR to verify all quantities, measurements, and existing conditions before submitting a proposal.*

1.02 **Performance Bond** – CONTRACTOR shall execute and provide to AQMD concurrently with the Contract Agreement a Performance Bond in the amount of the total, not to exceed compensation indicated in the Contract Agreement, and in a form approved by AQMD. No payment will be made to CONTRACTOR until the Performance Bond has been received and approved by AQMD. ***The term of the bond shall be two (2) years from the date the project is completed and approved by AQMD.***

Surety Qualifications – Only bonds executed by an admitted surety insurer, as defined in Code of Civil Procedure Section 995.120, shall be accepted. The surety must be a California-admitted surety with a current A.M. Best's rating no less than A: VII and satisfactory to AQMD. If a California-admitted surety insurer issuing bonds does not meet these requirements, the insurer will be considered qualified if it is in conformance with Section 995.660 of the California Code of Civil Procedure, and proof of such is provided to AQMD.

1.03 **Identification** – AQMD requires all CONTRACTOR and sub-contractor personnel working on AQMD's premises to wear uniforms or some type of identification. AQMD also requires all personnel to sign in and sign out in Contractor Log Book located at the Main Security Desk.

1.04 **System of Communication and Emergency Numbers** - CONTRACTOR shall provide and maintain for the duration of the project, a current list of emergency contact numbers for 24-hour emergency response. In case of emergency CONTRACTOR shall respond immediately upon notification. CONTRACTOR shall immediately notify the AQMD's Building Maintenance Manager or his designee of the emergency.

1.05 **Protection of property during inclement weather.** – During periods of storms, CONTRACTOR will provide supervisory inspections of the project during regular assigned hours to prevent or minimize possible damage from inclement weather. CONTRACTOR shall report any storm damage to AQMD's representative immediately. If remedial work is requested beyond the scope of this contract, it shall be paid for as extra work.

1.06 **Contractor's Representative** – CONTRACTOR hereby designates **[INSERT NAME OR TITLE]** to act as its representative for the performance of this Contract Agreement

("Contractor's Representative"). Contractor's Representative shall have full authority to represent and act on behalf of the CONTRACTOR for all purposes under this Contract Agreement. The Contractor's Representative shall supervise and direct the Services, using his best skill, attention, and shall be responsible for all means, methods, techniques, sequences, procedures and for the satisfactory coordination of all portions of the Services under this Contract Agreement.

- 1.07 **Project Inspections** – Periodically, Contractor's representative(s) will be requested to walk the project with AQMD's representative(s) for the purpose of determining compliance with the specifications listed in this Request for Proposal. AQMD will provide Contractor's Representative with a list of corrections not in compliance with these specifications. Items on the list must be corrected by CONTRACTOR prior to the next requested AQMD inspection.
- 1.08 **Licensing** – CONTRACTOR and subcontractors shall be licensed by the State of California in the categories necessary to perform work under this contract in compliance with all governmental agencies.
- 1.9 **Construction Schedules** - The Contractor shall provide to the AQMD's Building Maintenance Manager or his designee within five (5) days after receiving the "**Notice to Proceed**" and prior to starting the project, a construction schedule in the format of a Gantt chart using the computer program format in Microsoft Project 4.0 for Windows. The Contractor shall also provide a compact disk of said chart at the time of submittal of proposed schedule. Any change in the construction schedule will require the Contractor to provide additional charts and disk copies of those changes within two (2) working days of proposed change for approval by the AQMD's Building Maintenance Manager or his designee.
- 1.10 **Project Completion** - CONTRACTOR shall provide the AQMD's Building Maintenance Manager or his designee, upon completion of the project, a final written report. This report must include all project notes and corrections, manufacturer's warranty documents, specification sheets, parts diagrams, as built drawings, maintenance schedules and procedures.
- 1.11 **Prevailing Wages** – Contractor is aware of the requirements of California Labor Code Section 1720, et seq., and 1770, et seq., as well as California Code of Regulations, Title 8, Section 16000, et seq., (Prevailing Wage Laws), which require the payment of prevailing wage rates and performance of other requirements on "public works" and "maintenance" projects. Prevailing wage information is provided in the sample Draft Contract item number 32.
- 1.12 **Submittals** – Contractor shall provide a complete set of manufacturer's submittals and cut sheets with proposal for all materials specified in the RFP.



- 1.13 **As Built Drawings** – Contractor shall provide to AQMD a complete and comprehensive set of as built drawings for the project. Information to include but not limited to piping materials, valve locations and pipe size transitions.

## **2.00 Materials**

### **Copper and/or Non-Metallic Piping**

1. All replacement piping from ½ inch to 1 inch shall be Type “L” copper medium pressure rated at 32°F to 400°F
2. All replacement piping from 1¼ inch to 6 inch shall be copper and/or non-metallic piping materials.
3. All pipes shall be securely supported and anchored and shall conform to the Uniform Plumbing Code (UPC) latest edition and/or manufacturer’s recommendations
4. Pipe hangers shall be installed within 12” on each sides of all valves and check valves on pipe sizes 2” and above
5. Solder may be Staybrite #8 for all pipe diameter 1” or less
6. All “L” type copper piping connections may be soldered, or crimped with Pro-press fittings or equivalent.

### **Soldered and Flanged Bronze Three Piece Ball Valves ½ Inch to 3 Inch**

Three-piece bronze ball valves with stainless-steel trim & nib-seal handle (-NS when insulating) shall meet MSS SP-110, 150 psig SWP Rating, 600 psig CWP Rating, two-piece with threaded body packnut design (no threaded stem designs allowed) with adjustable stem packing. Body material: bronze ASTM B584 alloy C844, ends: solder; seats: TFE; stem: 316 stainless steel; ball: 316 stainless steel, vented, NIBCO model S-595-Y-66 (-NS) and S-590-Y-66 (-NS) for 3” only.

### **Lug Style Iron Butterfly Valves 4 Inch to 6 Inch**

Ductile iron lug style butterfly valves with EPDM seat and aluminum-bronze disc shall meet MSS SP-67 Type I, 200 psig CWP Rating, bubble tight shutoff, suitable for bidirectional dead-end service at rated pressure without use of downstream flange; body material: ASTM A536, ductile iron; seat: EPDM; stem: One-piece stainless steel; disc: aluminum bronze, NIBCO Model LD-2000-3.

### **Lug Style Iron, Center-Guided Check Valves 6 Inch**

Iron, globe, center-guided check valves shall meet MSS SP-125, 200 psig CWP Rating, for pump discharge; body material: ASTM A48, gray iron; style: globe, spring loaded; ends: flanged; seat: bronze, NIBCO Model F-910-B.

Chain operators shall also be furnished with 14 feet of lock-link (hot dipped galvanized/spark-resistant brass/stainless steel) chain. Ductile iron units shall be Babbitt "Hammer-blow" configuration.

### **Threaded Bronze Y-Type Strainers ½ Inch to 2 Inch**

Bronze Y-type strainer shall meet ANSI B1.20.1, 125 psig SWP Rating, 200 psig CWP Rating; Body Design: ASTM B584 or B62 bronze with screw-in tapped cap with blow off plug; ends: threaded; screen: ASTM E2016, 20 mesh 304 stainless steel. Screen must be accessible without removing the strainer from the line, NIBCO Model T-221-A.

### **Flanged Iron Y-Type Strainers 2½ Inch to 6 Inch**

Iron Y-type strainer shall meet ANSI B1.20.1, 125 psig SWP Rating, 200 psig CWP Rating; body design: ASTM BA-126 Class B cast iron with bolted on tapped cap with blow off plug; ends: flanged; screen: ASTM E2016, 20 mesh 304 stainless steel. Screen must be accessible without removing the strainer from the line, NIBCO Model F-721-A

### **Threaded Bronze Calibrated-Orifice Balancing Valves ½ Inch to 2 Inch**

Bronze calibrated-orifice balancing valve shall meet ANSI B1.20.1, 240 psig CWP Rating; body: bronze or dezincification brass, plug type with calibrated orifice for precise regulation and control; ends: threaded; plug: bronze or dezincification brass with EPDM o-ring; seat: bronze or dezincification brass, pressure gage connections: Shall have two metering test ports with internal check and protective caps for use with portable differential pressure metering stations; handle style: calibrated hand wheel equipped with visual position readout and concealed memory stops for repeatable regulation and control, NIBCO Model T-1710

### **Flanged Iron Calibrated-Orifice Balancing Valves 2½ Inch to 6 Inch**

Iron calibrated-orifice balancing valve shall meet ASME B16.1, 240 psig CWP Rating; body: cast-iron body, globe pattern with calibrated orifice; stem seals: EPDM O-rings; seat: bronze or dezincification brass; end connections: flanged, pressure gage connections: Integral seals for portable differential pressure meter; handle style: calibrated hand wheel equipped with visual position readout and concealed memory stops for repeatable regulation and control; insulating: when insulating the valves use pre-formed insulation kits, NIBCO Model F-737.

### **Class 125 Iron Body Check Valve for Pipe Size 2" Through 6"**

Check valves shall be cast iron ASTM 126 Class B; seat: bronze ASTM B 584 alloy C83600 (B) with Buna – N bonded to bronze (W); disc: bronze ASTM B 584 Alloy C83600; spring: stainless steel type 316 ASTM A 313; bushing: ASTM B 16; set screws: stainless steel type 304.

### **Class 125 Bronze Check Valve of Pipe Size ½" Through 2"**

Check valve shall be bronze ASTM B 62; hinge pin: bronze ASTM B 140 alloy C31400 or B134 alloy C23000; disc hanger: bronze ASTM B 62 or 304 stainless steel ½" and ¾" sizes; hanger nut: bronze ASTM B 16; disc holder: bronze ASTM B 62; seat disc: WOG (Buna – N) (W); seat disc nut: bronze ASTM B 16 or B 62; hinge pin plug: bronze ASTM B 140 alloy C31400; seat disc washer: ASTM B 98 alloy C65500 or ASTM B 103 (sizes ¾ through 2" only)

### **Babbitt Sprocket and Chain**

Approved chainwheel operators shall be manufactured by Babbitt Steam Specialty Co. (or equivalent) and shall include chainwheel and chain guide for 3 to 6 inch diameter valve handwheel. Chainwheel shall be made of cast iron, ductile iron, or aluminum/bronze. Rim shall contain as an integral part of the casting a groove into which the chain guide attaches. Chain guides shall be made of ductile iron or aluminum/bronze. Chainwheels shall be adjustable and detachable, furnished complete with steel or stainless steel attachment sets for attachment of chainwheel to valve handwheel. Units shall be coated with black enamel, galvanizing, "Teflon", or epoxy to meet manufacturer's specifications. Babbitt sprocket and chain shall be installed on each valve from 3" to 6" at a height of 10' or greater from finished floor.

### **Loop Hangers for ½" to 1" Nominal Pipe Sizes**

Loop hangers shall be Eirco swivel loop hanger 100 or approved equivalent.  
Surface Finish: electro-zinc plated  
Recommended for the suspension of stationary non-insulated pipe lines  
Features a retained insert nut to ensure that the loop hanger and insert nut stay together  
Conforms with federal specification WW-H-171 (Type 10), MSS SP-58 and SP-69 (Type 10)  
The spacing for loop hangers shall be greater than 7 feet

### **Loop Hangers for 1½" to 6" Nominal Pipe Sizes**

Loop hangers shall be Eirco swivel loop hanger 103 or approved equivalent.  
Adjustable band hanger with insulation shield  
Surface finish: electro-zinc plated  
Recommended for the suspension of stationary low or high temperature piping

where crush resistant material is installed at the point of support  
Protection shield is welded to loop before plating  
Flared edges on sizes through 4" only  
Conforms with Federal Specification WW-H-171 (Type 10), Manufacturers  
Standardization Society (MSS) SP-58 and SP-69 (Type 10)  
The spacing for Loop hangers shall be: 2" pipe, 7.5 feet; 3" pipe, 8.5 feet; 4" pipe,  
10 feet, and 6" pipe, 11 feet.

## **Pipe Insulation and Accessories**

### **Manufacturers:**

Knauf Insulation, Proto Corporation, CWCI, Refletix, or pre-approved equivalent.

### **Glass Fiber:**

Knauf 1000<sup>o</sup> pipe insulation meeting ASTM C 547, ASTM C 585, and ASTM C 795;  
rigid, molded, noncombustible.

1. 'K' ('ksi') value: ASTM C 335, 0.23 at 75<sup>o</sup> F (0.033 at 24<sup>o</sup> C) mean temperature.
2. Maximum service temperature: 1000<sup>o</sup> F (538<sup>o</sup> C).
3. Vapor retarder jacket: ASJ/SSL conforming to ASTM C 1136

## **Field-Applied Jackets or Fitting Covers**

1. PVC: Proto Corporation 25/50 or Indoor/Outdoor, UV-resistant fittings, jacketing and accessories, white or colored. Fitting cover system consists of pre-molded, high-impact PVC materials with fiber glass inserts. Fiber glass insert has a thermal conductivity ('K') of 0.26 at 75<sup>o</sup> F. ('ksi' - 0.037 at 24<sup>o</sup> C) mean temperature.

Closures: Stainless steel tacks, matching PVC tape, or PVC adhesive per manufacturer's recommendations.

## **Fire Stop**

All fire stop applications must meet and conform to Section 714, Penetrations of the International Building Code, 2012 edition.

## **Drywall Repair**

All gypsum board repairs shall conform to Chapter 25 of the International Building Code 2012 edition. Gypsum board materials and accessories shall be identified by the manufacturer's designation to indicate compliance with the appropriate standards referenced in Chapter 25 of the International Building Code 2012 Edition and stored to protect such materials from the weather.

Gypsum board materials shall conform to the appropriate standards listed in Table 2506.2 and Chapter 35 and, where required for fire protection, shall conform to the provisions of Chapter 7.

Metal suspension systems for acoustical and lay-in panel ceilings shall conform with ASTM C 635 listed in Chapter 35 and Section 13.5.6 of ASCE 7 for installation in high seismic areas.

### **3.00 Extra Work**

- 3.1** New or unforeseen work will be classified as Extra Work when the AQMD Building Maintenance Manager or his designee determines that it is not covered by the contract. In the event CONTRACTOR is requested and agrees to perform Extra Work, the following procedure will govern:
- CONTRACTOR shall submit an itemized written estimate for all labor and materials proposed for the Extra Work.
  - Extra Work shall not commence prior to receiving written authorization by the AQMD Building Maintenance Manager or his designee.
  - Work will be executed on a lump sum price, unless a basis for time-and-material is agreed upon.

Extra work may include, but is not limited to, repairs or replacements due to vandalism or other acts of humans or nature.

- 3.2** This contract does not grant CONTRACTOR the exclusive right to said Extra Work.

### **WARRANTY**

The CONTRACTOR shall provide a written manufacturer's parts and labor warranty as follows:

1. Non-Metallic Piping, Fittings, and Valves shall be warranted for a period of not less than 10 years covering all labor and material.
2. All metallic pipe, fittings, valves, and strainers shall be warranted for a period of not less than 1 year covering all labor and material.

### **PAYMENT**

- A. When in the opinion of the AQMD Building Maintenance Manager the CONTRACTOR has met each component of the deliverables per Attachment "C", Cost and Payment Schedule, the CONTRACTOR may submit an invoice for approval.
- B. When in the opinion of the Building Maintenance Manager or designee that the CONTRACTOR has completely performed the scope of work under the contract, the Building Maintenance Manager shall accept the work and shall be authorized to file, in the office of the Los Angeles County Recorder, a Notice of Completion. The CONTRACTOR will then submit to the AQMD Building Maintenance Manager or designee for approval a written statement of the final quantities and competition of contract items for inclusion in the final invoice. Upon receipt of such statement, the AQMD Building Maintenance Manager or designee shall review the quantities and work

included therein, and shall authorize the CONTRACTOR to submit an invoice for the balance of the contract, which in his opinion shall be just and fair, covering the amount and value of the total amount of work done by the CONTRACTOR, less ten percent (10%) retention of contract amount. Payment shall be made by AQMD to CONTRACTOR within thirty (30) days after approval of the final invoice prepared and furnished by CONTRACTOR.

- C. On the expiration of thirty-five (35) day retention period after the filing of the Notice of Completion of the work, AQMD shall pay to the CONTRACTOR the amount remaining as identified in the Cost and Payment Schedule item "D". It is the responsibility of the CONTRACTOR to invoice the AQMD for the final retention payment

**ATTACHMENT B**

**CERTIFICATIONS AND REPRESENTATIONS**



# South Coast Air Quality Management District

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

## **Business Information Request**

Dear SCAQMD Contractor/Supplier:

The South Coast Air Quality Management District (SCAQMD) is committed to ensuring that our contractor/supplier records are current and accurate. If your firm is selected for award of a purchase order or contract, it is imperative that the information requested herein be supplied in a timely manner to facilitate payment of invoices. In order to process your payments, we need the enclosed information regarding your account. **Please review and complete the information identified on the following pages, complete the enclosed W-9 form, remember to sign both documents for our files, and return them as soon as possible to the address below:**

**Attention: Accounts Payable, Accounting Department  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178**

If you do not return this information, we will not be able to establish you as a vendor. This will delay any payments and would still necessitate your submittal of the enclosed information to our Accounting department before payment could be initiated. Completion of this document and enclosed forms would ensure that your payments are processed timely and accurately.

If you have any questions or need assistance in completing this information, please contact Accounting at (909) 396-3777. We appreciate your cooperation in completing this necessary information.

Sincerely,

Michael B. O'Kelly  
Chief Financial Officer

DH:tm

Enclosures: Business Information Request  
Disadvantaged Business Certification  
W-9  
Federal Contract Debarment Certification  
Campaign Contribution Disclosure

REV 2/11





# South Coast Air Quality Management District

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

## BUSINESS INFORMATION REQUEST

Business Name	
Division of	
Subsidiary of	
Website Address	
Type of Business <i>Check One:</i>	<input type="checkbox"/> Individual <input type="checkbox"/> DBA, Name _____, County Filed in _____ <input type="checkbox"/> Corporation, ID No. _____ <input type="checkbox"/> LLC/LLP, ID No. _____ <input type="checkbox"/> Other _____

## REMITTING ADDRESS INFORMATION

Address			
City/Town			
State/Province		Zip	
Phone	(    )    -    Ext	Fax	(    )    -
Contact		Title	
E-mail Address			
Payment Name if Different			

All invoices must reference the corresponding Purchase Order Number(s)/Contract Number(s) if applicable and mailed to:

**Attention: Accounts Payable, Accounting Department**  
**South Coast Air Quality Management District**  
 21865 Copley Drive  
 Diamond Bar, CA 91765-417

**DISADVANTAGED BUSINESS CERTIFICATION**

Federal guidance for utilization of disadvantaged business enterprises allows a vendor to be deemed a small business enterprise (SBE), minority business enterprise (MBE) or women business enterprise (WBE) if it meets the criteria below.

- is certified by the Small Business Administration or
- is certified by a state or federal agency or
- is an independent MBE(s) or WBE(s) business concern which is at least 51 percent owned and controlled by minority group member(s) who are citizens of the United States.

Statements of certification:

As a prime contractor to the SCAQMD, \_\_\_\_\_ (name of business) will engage in good faith efforts to achieve the fair share in accordance with 40 CFR Section 31.36(e), and will follow the six affirmative steps listed below **for contracts or purchase orders funded in whole or in part by federal grants and contracts.**

1. Place qualified SBEs, MBEs, and WBEs on solicitation lists.
2. Assure that SBEs, MBEs, and WBEs are solicited whenever possible.
3. When economically feasible, divide total requirements into small tasks or quantities to permit greater participation by SBEs, MBEs, and WBEs.
4. Establish delivery schedules, if possible, to encourage participation by SBEs, MBEs, and WBEs.
5. Use services of Small Business Administration, Minority Business Development Agency of the Department of Commerce, and/or any agency authorized as a clearinghouse for SBEs, MBEs, and WBEs.
6. If subcontracts are to be let, take the above affirmative steps.

Self-Certification Verification: Also for use in awarding additional points, as applicable, in accordance with SCAQMD Procurement Policy and Procedure:

Check all that apply:

- Small Business Enterprise/Small Business Joint Venture  Women-owned Business Enterprise  
 Local business  Disabled Veteran-owned Business Enterprise/DVBE Joint Venture  
 Minority-owned Business Enterprise

Percent of ownership: \_\_\_\_\_ %

Name of Qualifying Owner(s): \_\_\_\_\_

I, the undersigned, hereby declare that to the best of my knowledge the above information is accurate. Upon penalty of perjury, I certify information submitted is factual.

C. _____	_____
NAME	TITLE

D. _____	_____
TELEPHONE NUMBER	DATE

## Definitions

**Disabled Veteran-Owned Business Enterprise** means a business that meets all of the following criteria:

- is a sole proprietorship or partnership of which is at least 51 percent owned by one or more disabled veterans, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
- the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.
- is a sole proprietorship, corporation, partnership, or joint venture with its primary headquarters office located in the United States and which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.

**Joint Venture** means that one party to the joint venture is a DVBE and owns at least 51 percent of the joint venture. In the case of a joint venture formed for a single project this means that DVBE will receive at least 51 percent of the project dollars.

**Local Business** means a business that meets all of the following criteria:

- has an ongoing business within the boundary of the SCAQMD at the time of bid application.
- performs 90 percent of the work within SCAQMD's jurisdiction.

**Minority-Owned Business Enterprise** means a business that meets all of the following criteria:

- is at least 51 percent owned by one or more minority persons or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more minority persons.
- is a business whose management and daily business operations are controlled or owned by one or more minority person.
- is a business which is a sole proprietorship, corporation, partnership, joint venture, an association, or a cooperative with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign business.

“Minority” person means a Black American, Hispanic American, Native American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian American (including a person whose origins are from India, Pakistan, or Bangladesh), Asian-Pacific American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, or Taiwan).

**Small Business Enterprise** means a business that meets the following criteria:

- a. 1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:
  - **A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or**
  - A manufacturer with 100 or fewer employees.
- b. Manufacturer means a business that is both of the following:
  - 1) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
  - 2) Classified between Codes 311000 to 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.

**Small Business Joint Venture** means that one party to the joint venture is a Small Business and owns at least 51 percent of the joint venture. In the case of a joint venture formed for a single project this means that the Small Business will receive at least 51 percent of the project dollars.

**Women-Owned Business Enterprise** means a business that meets all of the following criteria:

- is at least 51 percent owned by one or more women or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more women.
- is a business whose management and daily business operations are controlled or owned by one or more women.
- is a business which is a sole proprietorship, corporation, partnership, or a joint venture, with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign business.

## Request for Taxpayer Identification Number and Certification

Give form to the requester. Do not send to the IRS.

Print or type See Specific Instructions on page 2.	Name (as shown on your income tax return)	
	Business name, if different from above	
	Check appropriate box: <input type="checkbox"/> Individual/ Sole proprietor <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Other ▶ .....	
	<input type="checkbox"/> Exempt from backup withholding	
	Address (number, street, and apt. or suite no.)	Requester's name and address (optional)
	City, state, and ZIP code	
List account number(s) here (optional)		

### Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on Line 1 to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Social security number
+

or

Employer identification number
+

**Note.** If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

### Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. person (including a U.S. resident alien).

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the Certification, but you must provide your correct TIN. (See the instructions on page 4.)

<b>Sign Here</b>	Signature of U.S. person ▶	Date ▶
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### Purpose of Form

A person who is required to file an information return with the IRS, must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

**U.S. person.** Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding,
- or
3. Claim exemption from backup withholding if you are a U.S. exempt payee.

**Note.** If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

For federal tax purposes you are considered a person if you are:

- An individual who is a citizen or resident of the United States,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States, or

• Any estate (other than a foreign estate) or trust. See Regulations sections 301.7701-6(a) and 7(a) for additional information.

**Foreign person.** If you are a foreign person, do not use Form W-9. Instead, use the appropriate Form W-8 (see Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities).

**Nonresident alien who becomes a resident alien.** Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a "saving clause." Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the recipient has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items:

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.

4. The type and amount of income that qualifies for the exemption from tax.

5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

**Example.** Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if his or her stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first protocol) and is relying on this exception to claim an exemption from tax on his or her scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity not subject to backup withholding, give the requester the appropriate completed Form W-8.

**What is backup withholding?** Persons making certain payments to you must under certain conditions withhold and pay to the IRS 28% of such payments (after December 31, 2002). This is called "backup withholding." Payments that may be subject to backup withholding include interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester, or
2. You do not certify your TIN when required (see the Part II instructions on page 4 for details), or
3. The IRS tells the requester that you furnished an incorrect TIN, or
4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or
5. You do not certify to the requester that you are not subject to backup withholding under 4 above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See the instructions below and the separate Instructions for the Requester of Form W-9.

## Penalties

**Failure to furnish TIN.** If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

**Civil penalty for false information with respect to withholding.** If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

**Criminal penalty for falsifying information.** Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

**Misuse of TINs.** If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

## Specific Instructions

### Name

If you are an individual, you must generally enter the name shown on your social security card. However, if you have changed your last name, for instance, due to marriage without informing the Social Security Administration of the name change, enter your first name, the last name shown on your social security card, and your new last name.

If the account is in joint names, list first, and then circle, the name of the person or entity whose number you entered in Part I of the form.

**Sole proprietor.** Enter your individual name as shown on your social security card on the "Name" line. You may enter your business, trade, or "doing business as (DBA)" name on the "Business name" line.

**Limited liability company (LLC).** If you are a single-member LLC (including a foreign LLC with a domestic owner) that is disregarded as an entity separate from its owner under Treasury regulations section 301.7701-3, enter the owner's name on the "Name" line. Enter the LLC's name on the "Business name" line. Check the appropriate box for your filing status (sole proprietor, corporation, etc.), then check the box for "Other" and enter "LLC" in the space provided.

**Other entities.** Enter your business name as shown on required Federal tax documents on the "Name" line. This name should match the name shown on the charter or other legal document creating the entity. You may enter any business, trade, or DBA name on the "Business name" line.

**Note.** You are requested to check the appropriate box for your status (individual/sole proprietor, corporation, etc.).

### Exempt From Backup Withholding

If you are exempt, enter your name as described above and check the appropriate box for your status, then check the "Exempt from backup withholding" box in the line following the business name, sign and date the form.

Generally, individuals (including sole proprietors) are not exempt from backup withholding. Corporations are exempt from backup withholding for certain payments, such as interest and dividends.

**Note.** If you are exempt from backup withholding, you should still complete this form to avoid possible erroneous backup withholding.

**Exempt payees.** Backup withholding is not required on any payments made to the following payees:

1. An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2),
  2. The United States or any of its agencies or instrumentalities,
  3. A state, the District of Columbia, a possession of the United States, or any of their political subdivisions or instrumentalities,
  4. A foreign government or any of its political subdivisions, agencies, or instrumentalities, or
  5. An international organization or any of its agencies or instrumentalities.
- Other payees that may be exempt from backup withholding include:
6. A corporation,



- 7. A foreign central bank of issue,
- 8. A dealer in securities or commodities required to register in the United States, the District of Columbia, or a possession of the United States,
- 9. A futures commission merchant registered with the Commodity Futures Trading Commission,
- 10. A real estate investment trust,
- 11. An entity registered at all times during the tax year under the Investment Company Act of 1940,
- 12. A common trust fund operated by a bank under section 584(a),
- 13. A financial institution,
- 14. A middleman known in the investment community as a nominee or custodian, or
- 15. A trust exempt from tax under section 664 or described in section 4947.

The chart below shows types of payments that may be exempt from backup withholding. The chart applies to the exempt recipients listed above, 1 through 15.

IF the payment is for . . .	THEN the payment is exempt for . . .
Interest and dividend payments	All exempt recipients except for 9
Broker transactions	Exempt recipients 1 through 13. Also, a person registered under the Investment Advisers Act of 1940 who regularly acts as a broker
Barter exchange transactions and patronage dividends	Exempt recipients 1 through 5
Payments over \$600 required to be reported and direct sales over \$5,000 <sup>1</sup>	Generally, exempt recipients 1 through 7 <sup>2</sup>

<sup>1</sup>See Form 1099-MISC, Miscellaneous Income, and its instructions.

<sup>2</sup>However, the following payments made to a corporation (including gross proceeds paid to an attorney under section 6045(f), even if the attorney is a corporation) and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees; and payments for services paid by a Federal executive agency.

## Part I. Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. If you are a resident alien and you do not have and are not eligible to get an SSN, your TIN is your IRS individual taxpayer identification number (ITIN). Enter it in the social security number box. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN. However, the IRS prefers that you use your SSN.

If you are a single-owner LLC that is disregarded as an entity separate from its owner (see *Limited liability company (LLC)* on page 2), enter your SSN (or EIN, if you have one). If the LLC is a corporation, partnership, etc., enter the entity's EIN.

**Note.** See the chart on page 4 for further clarification of name and TIN combinations.

**How to get a TIN.** If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local Social Security Administration office or get this form online at [www.socialsecurity.gov/online/ss-5.pdf](http://www.socialsecurity.gov/online/ss-5.pdf). You may also get this form by calling 1-800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at [www.irs.gov/businesses/](http://www.irs.gov/businesses/) and clicking on Employer ID Numbers under Related Topics. You can get Forms W-7 and SS-4 from the IRS by visiting [www.irs.gov](http://www.irs.gov) or by calling 1-800-TAX-FORM (1-800-829-3676).

If you are asked to complete Form W-9 but do not have a TIN, write "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, generally you will have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

**Note.** Writing "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon.

**Caution:** A disregarded domestic entity that has a foreign owner must use the appropriate Form W-8.

**Part II. Certification**

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if items 1, 4, and 5 below indicate otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). Exempt recipients, see *Exempt From Backup Withholding* on page 2.

Signature requirements. Complete the certification as indicated in 1 through 5 below.

1. Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983. You must give your correct TIN, but you do not have to sign the certification.

2. Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983. You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.

3. Real estate transactions. You must sign the certification. You may cross out item 2 of the certification.

4. Other payments. You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions. You must give your correct TIN, but you do not have to sign the certification.

**What Name and Number To Give the Requester**

For this type of account:	Give name and SSN of:
1. Individual	The individual
2. Two or more individuals (joint account)	The actual owner of the account or, if combined funds, the first individual on the account <sup>1</sup>
3. Custodian account of a minor (Uniform Gift to Minors Act)	The minor <sup>2</sup>
4. a. The usual revocable savings trust (grantor is also trustee)	The grantor-trustee <sup>1</sup>
b. So-called trust account that is not a legal or valid trust under state law	The actual owner <sup>1</sup>
5. Sole proprietorship or single-owner LLC	The owner <sup>3</sup>
For this type of account:	Give name and EIN of:
6. Sole proprietorship or single-owner LLC	The owner <sup>3</sup>
7. A valid trust, estate, or pension trust	Legal entity <sup>4</sup>
8. Corporate or LLC electing corporate status on Form 8832	The corporation
9. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
10. Partnership or multi-member LLC	The partnership
11. A broker or registered nominee	The broker or nominee
12. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments	The public entity

<sup>1</sup>List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

<sup>2</sup>Circle the minor's name and furnish the minor's SSN.

<sup>3</sup>You must show your individual name and you may also enter your business or "DBA" name on the second name line. You may use either your SSN or EIN (if you have one). If you are a sole proprietor, IRS encourages you to use your SSN.

<sup>4</sup>List first and circle the name of the legal trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.)

Note. If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

**Privacy Act Notice**

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons who must file information returns with the IRS to report interest, dividends, and certain other income paid to you, mortgage interest you paid, the acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA, or Archer MSA or HSA. The IRS uses the numbers for identification purposes and to help verify the accuracy of your tax return. The IRS may also provide this information to the Department of Justice for civil and criminal litigation, and to cities, states, and the District of Columbia to carry out their tax laws. We may also disclose this information to other countries under a tax treaty, to federal and state agencies to enforce federal nontax criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism.

You must provide your TIN whether or not you are required to file a tax return. Payers must generally withhold 28% of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to a payer. Certain penalties may also apply.





United State Environmental Protection Agency  
Washington, DC 20460

## **Certification Regarding Debarment, Suspension, and Other Responsibility Matters**

The prospective participant certifies to the best of its knowledge and belief that it and the principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three year period preceding this proposal been convicted of or had a civil judgement rendered against them or commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction: violation of Federal or State antitrust statute or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

I understand that a false statement on this certification may be grounds for rejection of this proposal or termination of the award. In addition, under 18 USC Sec. 1001, a false statement may result in a fine of up to \$10,000 or imprisonment for up to 5 years, or both.

---

Typed Name & Title of Authorized Representative

---

Signature of Authorized Representative Date

I am unable to certify to the above statements. My explanation is attached.



## CAMPAIGN CONTRIBUTIONS DISCLOSURE

California law prohibits a party, or an agent, from making campaign contributions to AQMD Governing Board Members or members/alternates of the Mobile Source Pollution Reduction Committee (MSRC) of \$250 or more while their contract or permit is pending before the AQMD; and further prohibits a campaign contribution from being made for three (3) months following the date of the final decision by the Governing Board or the MSRC on a donor's contract or permit. Gov't Code §84308(d). For purposes of reaching the \$250 limit, the campaign contributions of the bidder or contractor plus contributions by its parents, affiliates, and related companies of the contractor or bidder are added together. 2 C.C.R. §18438.5.

In addition, Board Members or members/alternates of the MSRC must abstain from voting on a contract or permit if they have received a campaign contribution from a party or participant to the proceeding, or agent, totaling \$250 or more in the 12-month period prior to the consideration of the item by the Governing Board or the MSRC. Gov't Code §84308(c). When abstaining, the Board Member or members/alternates of the MSRC must announce the source of the campaign contribution on the record. *Id.* The requirement to abstain is triggered by campaign contributions of \$250 or more in total contributions of the bidder or contractor, *plus* any of its parent, subsidiary, or affiliated companies. 2 C.C.R. §18438.5.

In accordance with California law, bidders and contracting parties are required to disclose, at the time the application is filed, information relating to any campaign contributions made to Board Members or members/alternates of the MSRC, including: the name of the party making the contribution (which includes any parent, subsidiary or otherwise related business entity, as defined below), the amount of the contribution, and the date the contribution was made. 2 C.C.R. §18438.8(b).

The list of current AQMD Governing Board Members can be found at the AQMD website ([www.aqmd.gov](http://www.aqmd.gov)). The list of current MSRC members/alternates can be found at the MSRC website (<http://www.cleantransportationfunding.org>).

### **SECTION I. Please complete Section I.**

**Contractor:**

**RFP #:** P2012-16

\_\_\_\_\_

**List any parent, subsidiaries, or otherwise affiliated business entities of Contractor: (*See definition below*).**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### **SECTION II**

Has contractor and/or parent, subsidiary, or affiliated company, or agent thereof, made a campaign contribution(s) totaling \$250 or more in the aggregate to a current member of the South Coast Air Quality Management Governing Board or members/alternates of the MSRC in the 12 months preceding the date of execution of this disclosure?

Yes     No    **If YES, complete Section II below and then sign and date the form. If NO, sign and date below. Include this form with your submittal.**

**Campaign Contributions Disclosure, *continued*:**

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/Alternate	Amount of Contribution	Date of Contribution

Name of Contributor \_\_\_\_\_

_____	_____	_____
Governing Board Member or MSRC Member/alternate	Amount of Contribution	Date of Contribution

**I declare the foregoing disclosures to be true and correct.**

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## DEFINITIONS

Parent, Subsidiary, or Otherwise Related Business Entity.

- (1) *Parent subsidiary. A parent subsidiary relationship exists when one corporation directly or indirectly owns shares possessing more than 50 percent of the voting power of another corporation.*
  
- (2) *Otherwise related business entity. Business entities, including corporations, partnerships, joint ventures and any other organizations and enterprises operated for profit, which do not have a parent subsidiary relationship are otherwise related if any one of the following three tests is met:*
  - (A) *One business entity has a controlling ownership interest in the other business entity.*
  - (B) *There is shared management and control between the entities. In determining whether there is shared management and control, consideration should be given to the following factors:*
    - (i) *The same person or substantially the same person owns and manages the two entities;*
    - (ii) *There are common or commingled funds or assets;*
    - (iii) *The business entities share the use of the same offices or employees, or otherwise share activities, resources or personnel on a regular basis;*
    - (iv) *There is otherwise a regular and close working relationship between the entities; or*
  - (C) *A controlling owner (50% or greater interest as a shareholder or as a general partner) in one entity also is a controlling owner in the other entity.*

2 Cal. Code of Regs., §18703.1(d).

# ATTACHMENT C

## Cost

Total amount for the Replacement of Black Steel HVAC Piping  
RFP #P2013-04 identified in the Scope of Work Attachment A

\$ \_\_\_\_\_

## Cost and Payment Schedule

a. Remit invoice for 25% of the contract amount upon Contract Execution , payment upon approval of invoice net/30	
b. Remit invoice for 25% of contract amount after all materials and equipment has been delivered to the site, and project is 50% complete as determined by AQMD. Conditional lien releases from all suppliers, laborers and subcontractors must accompany the invoice. Payment upon approval of invoice net/30	
c. Remit balance of the contract amount less the required 10% retention upon completion of the project. Conditional lien releases from all suppliers, laborers and subcontractors must accompany the invoice. Payment upon approval of invoice net/30	
d. Remit invoice for 10% retention 35 days after filing of the Notice of Completion or accepted competition from AQMD of the work as indicated below in Section B. Unconditional lien releases from all suppliers, laborers and subcontractors must accompany the invoice before invoice will be submitted for payment.	

- A.** WHENEVER in the opinion of the AQMD's Project Manager the CONTRACTOR has completely performed the contract on his part, the AQMD Project Manager shall notify the Building Maintenance Manager that the contract has been completed in its entirety. He shall request that the Building Maintenance Manager accept the work and that AQMD be authorized to file, in the office of the Los Angeles County Recorder, a notice of completion of the work herein agreed to be done by the CONTRACTOR. The CONTRACTOR will then submit to the AQMD Project Manager for approval a written statement of the final quantities and competition of contract items for inclusion in the final invoice. Upon receipt of such statement, the AQMD Project Manager shall review the quantities and work included therein and shall authorize the CONTRACTOR to submit an invoice for the balance of the contract amount which in AQMD Project Managers opinion shall be just and fair, covering the amount and value of the total amount of work done by the CONTRACTOR, less ten percent (10%) of the total work done. Payment shall be made by AQMD to CONTRACTOR within thirty (30) days after approval by AQMD of an invoice prepared and furnished by CONTRACTOR showing services performed and referencing tasks and deliverables.
- B.** On the expiration of thirty-five (35) days after the filing of the notice of completion of the work, the AQMD shall pay to the CONTRACTOR the amount remaining after deducting from the amount or value stated in the invoice all prior payments to the CONTRACTOR and all amounts to be kept and retained under the provisions of the contract. It is the responsibility of the CONTRACTOR to invoice the AQMD for the final retention payment

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 6

**PROPOSAL:** Recognize Funds and Approve Additional Truck Projects under “Year 3” Proposition 1B-Goods Movement Program

**SYNOPSIS:** CARB has informed the AQMD that additional “Year 3” Proposition 1B-Goods Movement Program funds are available, and up to \$10.5 million of these funds will be allocated to the AQMD for truck projects. These funds will bring the South Coast/Inland Empire corridor’s share to 55% of the total program funds as originally approved by CARB Board. Hence, these actions are to recognize up to \$10.5 million in “Year 3” Proposition 1B-Goods Movement Program funds from CARB, and to execute contracts for heavy-duty diesel truck projects until all the project funds of the newly allocated funds, in addition to any “Years 2 & 3” returned and accrued interest funds designated for truck projects are exhausted from the Proposition 1B-Goods Movement Program Fund (81).

**COMMITTEE:** Not Applicable

**RECOMMENDED ACTIONS:**

1. Recognize up to \$10,500,000 from CARB as part of the “Year 3” Goods Movement Program funds and place them into the AQMD’s Proposition 1B-Goods Movement Program Fund (81), in accordance with AQMD accounting practices; and
2. Authorize the Executive Officer to execute contracts for heavy-duty diesel trucks from the list in Table 1, subject to CARB’s final approval, in an amount not to exceed the amount of the project funds to be received from CARB under the above action item, in addition to any “Years 2 & 3” returned and accrued interest funds, until all the funds designated for heavy-duty truck projects are exhausted from the Proposition 1B-Goods Movement Program Fund (81).

Barry R. Wallerstein, D.Env.  
Executive Officer

## **Background**

As coordinated between CARB and the participating air districts in the Goods Movement Program, the Board at its March 4, 2011 meeting, approved the issuance of Program Announcement PA2011-11 for truck projects. The applications under this solicitation were used to first fund projects under the “Year 2,” and subsequently under the “Year 3” of the program. As such, over 2,200 trucks for the amount of about \$85 million have been funded.

CARB has now informed the AQMD that there are additional “Year 3” Proposition 1B funds, of which up to \$10.5 million will be allocated to the AQMD for truck projects. These funds will bring the South Coast/Inland Empire corridor’s share to 55% of the total program funds as originally approved by CARB Board. CARB has also required that all the contracts be executed by November 30, 2012, and the projects be completed on the same schedule as the current contracts under the “Years 2 & 3.” This means all the trucks must be delivered either by March 31, 2013, or latest by June 31, 2013, if the delays are documented by the truck manufacturers.

## **Proposal**

After several consultations with CARB staff, in order to meet the extremely tight schedule of contract executions by November 30, 2012, it was agreed to contact the applicants under Program Announcement PA2011-11, who were not considered before, due to the incompleteness of their applications, and try to complete as many applications as possible. As such, the eligible list of eligible trucks outlined in Table 1, was evaluated and ranked, and is subject to CARB’s final approval.

These actions are to recognize up to \$10.5 million in “Year 3” Proposition 1B-Goods Movement Program funds from CARB, and to execute contracts for heavy-duty diesel truck projects from the list in Table 1, subject to CARB approval, until all project funds, the newly allocated funds, plus any “Years 2 & 3” returned and accrued interest funds designated for truck projects are, exhausted from the Proposition 1B-Goods Movement Program Fund (81).

## **Outreach**

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

Additionally, potential bidders may have been notified utilizing AQMD’s own electronic listing of certified minority vendors. Notice of the RFP/RFQ has been e-mailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at AQMD’s website

(<http://www.aqmd.gov>). Information is also available on AQMD's bidder's 24-hour telephone message line (909) 396-2724.

**Benefits to AQMD**

The successful implementation of the truck projects will reduce NOx, PM and other pollutant emissions in a cost-effective and expeditious manner which will help achieve the goals of the 2007 AQMP. The new equipment/vehicles funded under this program are expected to operate for many years which will provide long-term emission reduction benefits in the region.

**Resource Impacts**

Funding for truck projects shall not exceed the total amount of project funds recognized in this letter, in addition to any "Years 2 & 3" returned and accrued interest funds, from the Proposition 1B-Goods Movement Program Fund (81).

**Attachment**

Table 1: Heavy-Duty Diesel Truck Projects



**Table 1: Heavy-Duty Diesel Truck Projects**

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
1	217-16	Kouklis Equipment Company, Inc.	Replacement	\$ 30,000
2	818-3523	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
3	569-21	Villa Park Trucking	Replacement	\$ 40,000
4	744-7008	John Ilejay III Trucking Inc.	Replacement	\$ 59,000
5	146-110	Evans Dedicated Systems, Inc.	Replacement	\$ 60,000
6	326-000	Edward D. Jones	Replacement	\$ 48,000
7	213-095	Desert Coastal Transport Inc.	Replacement	\$ 40,000
8	818-3552	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
9	359-000	Erick Estrada	Replacement	\$ 50,000
10	744-700	John Ilejay III Trucking Inc.	Replacement	\$ 59,000
11	217-66	Kouklis Equipment Company, Inc.	Replacement	\$ 35,000
12	744-7001	John Ilejay III Trucking Inc.	Replacement	\$ 59,000
13	156-036	Anthony George Sacre	Replacement	\$ 60,000
14	744-7002	John Ilejay III Trucking Inc.	Replacement	\$ 59,000
15	478-000	Israel Juarez Ralda	Replacement	\$ 40,000
16	798-000	Jose Trinidad	Replacement	\$ 50,000
17	089-000	Daniel De La Puente	Replacement	\$ 40,000
18	165-2120	RRM Properties	Replacement	\$ 60,000
19	702-2	A&Z Trucking Inc.	Replacement	\$ 50,000
20	213-096	Desert Coastal Transport Inc.	Replacement	\$ 40,000
21	587-998	Pacific High Leasing, LLC	Replacement	\$ 60,000
22	608-73	Physical Distribution Service Inc.	Replacement	\$ 50,000
23	235-000	Miguel Angel Esquivel	Replacement	\$ 40,000
24	018-200	Biagi Bros, Inc	Replacement	\$ 60,000
25	372-112	Pacific Tank Lines	Replacement	\$ 60,000
26	702-8	A&Z Trucking Inc.	Replacement	\$ 50,000
27	146-927	Evans Dedicated Systems, Inc.	Replacement	\$ 60,000
28	213-097	Desert Coastal Transport Inc.	Replacement	\$ 40,000
29	581-37	Francisco Sanchez	Replacement	\$ 40,000
30	176-002	Borrmann Metal Center Inc.	Replacement	\$ 60,000
31	217-68	Kouklis Equipment Company, Inc.	Replacement	\$ 25,000
32	225- PO49988	99 Cents Only Stores	Replacement	\$ 40,000
33	494-000	Ricardo Huizar	Replacement	\$ 50,000
34	035-2006	Arturo Hasakian DBA A&H Transport	Replacement	\$ 60,000
35	621-011	SPR Trucking Inc.	Replacement	\$ 40,000
36	018-235	Biagi Bros, Inc	Replacement	\$ 60,000
37	218-284	Dalton Trucking Inc.	Replacement	\$ 45,000
38	818-3539	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
39	225- PO26964	99 Cents Only Stores	Replacement	\$ 40,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
40	372-110	Pacific Tank Lines	Replacement	\$ 60,000
41	225-PO27273	99 Cents Only Stores	Replacement	\$ 40,000
42	165-3098	RRM Properties	Replacement	\$ 60,000
43	269-120	Ong Pickup & Delivery Service, Inc.	Replacement	\$ 60,000
44*				
45	625-848	West Coast Turf	Replacement	\$ 60,000
46	225-PO37759	99 Cents Only Stores	Replacement	\$ 40,000
47	372-114	Pacific Tank Lines	Replacement	\$ 60,000
48	404-000	Nery Osman Orellana	Replacement	\$ 40,000
49	500-000	Francisco Herrera	Replacement	\$ 50,000
50	216-000	Pablo Augusto	Replacement	\$ 40,000
51	018-199	Biagi Bros, Inc	Replacement	\$ 60,000
52	770-1	Juan Gomez Dominguez	Replacement	\$ 50,000
53	215-625	Arakelian Enterprises Inc. DBA United Waste Recycling/Transfer, Athens Services	Replacement	\$ 60,000
54	035-003	Arturo Hasakian DBA A&H Transport	Replacement	\$ 60,000
55	555-17	JEA Trucking Inc.	Replacement	\$ 60,000
56	313-104	TCK Leasing Corp.	Replacement	\$ 60,000
57	808-276	Phillip Butler	Replacement	\$ 40,000
58	491-513	Lee Jennings Target Express, Inc.	Replacement	\$ 60,000
59	208-474	RRM Properties	Replacement	\$ 60,000
60	812-300	Nazario Lopez DBA Lopez Trucking	Replacement	\$ 40,000
61	208-485	RRM Properties	Replacement	\$ 60,000
62	066-001	South California Fueling Transport, Inc.	Replacement	\$ 60,000
63	225-PO15404	99 Cents Only Stores	Replacement	\$ 40,000
64	018-202	Biagi Bros, Inc	Replacement	\$ 60,000
65	018-237	Biagi Bros, Inc	Replacement	\$ 60,000
66	647-506	Bear Trucking, Inc.	Replacement	\$ 55,000
67	647-509	Bear Trucking, Inc.	Replacement	\$ 55,000
68	225-PO26965	99 Cents Only Stores	Replacement	\$ 40,000
69	018-229	Biagi Bros, Inc	Replacement	\$ 60,000
70	502-572	Southern California Solutions, Inc.	Replacement	\$ 50,000
71	218-221	Dalton Trucking Inc.	Replacement	\$ 35,000
72	225-PO41289	99 Cents Only Stores	Replacement	\$ 40,000
73	369-5	Aram Soibatian	Replacement	\$ 50,000
74	018-195	Biagi Bros, Inc	Replacement	\$ 60,000
75	622-197	Marvin Alfaro Recinos	Replacement	\$ 40,000
76	463-117	South Bound Express, Inc.	Replacement	\$ 60,000
77	225-PO44831	99 Cents Only Stores	Replacement	\$ 40,000
78	217-62	Kouklis Equipment Company, Inc.	Replacement	\$ 25,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
79	491-748	Lee Jennings Target Express, Inc.	Replacement	\$ 60,000
80	217-67	Kouklis Equipment Company, Inc.	Replacement	\$ 30,000
81	699-018	Alpha Materials, Inc.	Replacement	\$ 15,000
82	207-004	F&F Transport Services Inc.	Replacement	\$ 40,000
83	760-5	Industrial Battery Engineering, Inc.	Replacement	\$ 60,000
84	699-347	Alpha Materials, Inc.	Replacement	\$ 20,000
85	831-000	Valentin A Camberos	Replacement	\$ 50,000
86	274-2406	Apex Bulk Commodities LLC	Replacement	\$ 40,000
87	699-351	Alpha Materials, Inc.	Replacement	\$ 20,000
88	621-003	SPR Trucking Inc.	Replacement	\$ 40,000
89	699-350	Alpha Materials, Inc.	Replacement	\$ 20,000
90	621-001	SPR Trucking Inc.	Replacement	\$ 40,000
91	018-211	Biagi Bros, Inc	Replacement	\$ 60,000
92	052-003	Martian Trucking Inc	Replacement	\$ 55,000
93	497-000	Sergio Ortiz Ramos	Replacement	\$ 50,000
94	699-343	Alpha Materials, Inc.	Replacement	\$ 20,000
95*				
96	549-207	Nutricion Fundamental, Inc	Replacement	\$ 60,000
97	517-7	MSA Trucking, LLC	Replacement	\$ 50,000
98*				
99	370-7	Agustin Perez Trucking	Replacement	\$ 40,000
100	699-355	Alpha Materials, Inc.	Replacement	\$ 20,000
101	576-113	Quik Pick Express, LLC	Replacement	\$ 60,000
102	591-228	Metro Express Inc.	Replacement	\$ 40,000
103	375-76	WC Logistics Inc	Replacement	\$ 50,000
104	218-246	Dalton Trucking Inc.	Replacement	\$ 10,000
105	639-000	Richards Foods Distributors	Replacement	\$ 60,000
106	517-5	MSA Trucking, LLC	Replacement	\$ 50,000
107	753-375	Tri West Ltd	Replacement	\$ 60,000
108	659-CO509	Oxnard Building Materials	Replacement	\$ 60,000
109	208-975	RRM Properties	Replacement	\$ 60,000
110	641-17	Swain Oil Transport Inc. DBA Vista Energy Transport Inc.	Replacement	\$ 60,000
111	699-120	Alpha Materials, Inc.	Replacement	\$ 28,000
112	305-171	West Coast Leaseways, LLC	Replacement	\$ 40,000
113	099-000	The Trailer Company Inc.	Replacement	\$ 60,000
114	744-7004	John Ilejay III Trucking Inc.	Replacement	\$ 59,000
115	621-002	SPR Trucking Inc.	Replacement	\$ 40,000
116	699-130	Alpha Materials, Inc.	Replacement	\$ 30,000
117	699-131	Alpha Materials, Inc.	Replacement	\$ 40,000
118	744-7007	John Ilejay III Trucking Inc.	Replacement	\$ 59,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
119	375-33	WC Logistics Inc	Replacement	\$ 50,000
120	476-005	Francisco Piche	Replacement	\$ 50,000
121	165-3042	RRM Properties	Replacement	\$ 60,000
122	431-000	Leopoldo Garcia	Replacement	\$ 40,000
123	165-3041	RRM Properties	Replacement	\$ 60,000
124	491-717	Lee Jennings Target Express, Inc.	Replacement	\$ 60,000
125*				
126	641-22	Swain Oil Transport Inc. DBA Vista Energy Transport Inc.	Replacement	\$ 60,000
127	581-3	Francisco Sanchez	Replacement	\$ 40,000
128	208-598	RRM Properties	Replacement	\$ 60,000
129	581-005	Francisco Sanchez	Replacement	\$ 40,000
130	372-115	Pacific Tank Lines	Replacement	\$ 60,000
131	702-6	A&Z Trucking Inc.	Replacement	\$ 50,000
132	581-1	Francisco Sanchez	Replacement	\$ 40,000
133	208-592	RRM Properties	Replacement	\$ 60,000
134	073-007	Dura Freight Inc	Replacement	\$ 60,000
135	453-000	Lunas Trucking	Replacement	\$ 40,000
136	022-000	Steve Fregoso Valdez	Replacement	\$ 50,000
137	730-D	Star Milling Company	Replacement	\$ 55,000
138	282-000	Jose F Menjivar	Replacement	\$ 60,000
139	699-114	Alpha Materials, Inc.	Replacement	\$ 60,000
140	225-PO41292	99 Cents Only Stores	Replacement	\$ 40,000
141	295-37	Dunkel Bros Machinery Moving Inc.	Replacement	\$ 60,000
142	225- PO43243	99 Cents Only Stores	Replacement	\$ 40,000
143	018-230	Biagi Bros, Inc	Replacement	\$ 60,000
144	745-000	DSD Trucking Inc.	Replacement	\$ 50,000
145	750-4SS7	Ramon Solis	Replacement	\$ 50,000
146	305-153	Furniture Transportation System, Inc	Replacement	\$ 40,000
147	218-262	Dalton Trucking Inc.	Replacement	\$ 54,000
148	556-000	Hovanes Harutyunian	Replacement	\$ 40,000
149	351-1	Isaac Medina	Replacement	\$ 60,000
150	462-1593	Federico Fernando Herrera	Replacement	\$ 40,000
151	795-000	Abel Colindres	Replacement	\$ 30,000
152	378-419	Westside Building Materials	Replacement	\$ 50,000
153	018-228	Biagi Bros, Inc	Replacement	\$ 60,000
154	821-30123719	Unified Grocers Inc.	Replacement	\$ 60,000
155	576-111	Quik Pick Express, LLC	Replacement	\$ 60,000
156	313-111	Tck Leasing Corp.	Replacement	\$ 60,000
157	313-109	Tck Leasing Corp.	Replacement	\$ 60,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
158	317-4052	Saul Vallecillo	Replacement	\$ 40,000
159	313-206	Tek Leasing Corp.	Replacement	\$ 60,000
160	301-15	Adonis Transport Inc.	Replacement	\$ 60,000
161	476-002	Francisco Piche	Replacement	\$ 50,000
162	064-000	Gabriel Venegas Placencia	Replacement	\$ 40,000
163	044-6	Carpinteria Motor Transport	Replacement	\$ 59,000
164	129-136	Western Regional Delivery	Replacement	\$ 40,000
165	092-1501PD	Oak Harbor Freight Lines Inc	Replacement	\$ 60,000
166	203-000	Raul Antonio Rodriguez	Replacement	\$ 50,000
167	432-000	Nelson A Orellana	Replacement	\$ 40,000
168*				
169	321-002	Rail Delivery Service	Replacement	\$ 50,000
170*				
171	517-6	MSA Trucking, LLC	Replacement	\$ 50,000
172	621-004	SPR Trucking Inc.	Replacement	\$ 40,000
173*				
174	601-000	KTrans Inc.	Replacement	\$ 50,000
175*				
176	621-006	SPR Trucking Inc.	Replacement	\$ 40,000
177	196-000	Guillermo A Mendoza	Replacement	\$ 60,000
178	621-007	SPR Trucking Inc.	Replacement	\$ 40,000
179	764-3	Norbert Otzoy	Replacement	\$ 60,000
180	621-012	SPR Trucking Inc.	Replacement	\$ 40,000
181	792-000	Jose Amilcar Montenegro	Replacement	\$ 60,000
182	696-59	Nuckles Oil Co. Inc. DBA Merit Oil Co.	Replacement	\$ 60,000
183	141-004	Ajax Leasing	Replacement	\$ 60,000
184	215-786	Arakelian Enterprises Inc. DBA United Waste Recycling/Transfer, Athens Services	Replacement	\$ 60,000
185	218-222	Dalton Trucking Inc.	Replacement	\$ 30,000
186	491-604	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
187	609-P189	Matheson Trucking Inc.	Replacement	\$ 40,000
188	818-13121	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
189	631-000	Oscar Garcia DBA O.G. Trucking	Replacement	\$ 50,000
190	225- PO41317	99 Cents Only Stores	Replacement	\$ 40,000
191	372-111	Pacific Tank Lines	Replacement	\$ 60,000
192	274-2420	Apex Bulk Commodities LLC	Replacement	\$ 40,000
193	818-13111	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
194	098-34	Ron & Sons Trucking, Inc.	Replacement	\$ 50,000
195	586-1313007	SA Recycling LLC	Replacement	\$ 52,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
196	165-1101	RRM Properties	Replacement	\$ 40,000
197	301-1	Adonis Transport Inc.	Replacement	\$ 60,000
198	301-6	Adonis Transport Inc.	Replacement	\$ 60,000
199	133-335	Redlands Fruit Company	Replacement	\$ 40,000
200	581-2	Francisco Sanchez	Replacement	\$ 40,000
201	621-013	SPR Trucking Inc.	Replacement	\$ 40,000
202	586-1504003	SA Recycling LLC	Replacement	\$ 58,525
203	370-8	Agustin Perez Trucking	Replacement	\$ 40,000
204	146-23026	Evans Dedicated Systems, Inc.	Replacement	\$ 60,000
205	002-002	Ruben Rodriguez	Replacement	\$ 50,000
206	335-000	Antonio Hernandez	Replacement	\$ 48,000
207	480-000	Rafael Mejia	Replacement	\$ 60,000
208	691-23	Jose Herrera	Replacement	\$ 60,000
209	691-20	Jose Herrera	Replacement	\$ 60,000
210	165-3099	RRM Properties	Replacement	\$ 60,000
211	218-257	Dalton Trucking Inc.	Replacement	\$ 52,000
212	696-43	Nuckles Oil Co. Inc. DBA Merit Oil Co.	Replacement	\$ 40,000
213	549-3	Nutricion Fundamental, Inc	Replacement	\$ 60,000
214	225-PO40438	99 Cents Only Stores	Replacement	\$ 40,000
215	554-TR29	Northgate Gonzalez, LLC	Replacement	\$ 60,000
216	136-000	Ernesto Torres Trucking Inc.	Replacement	\$ 40,000
217	274-2450	Apex Bulk Commodities LLC	Replacement	\$ 40,000
218	401-24	Martinez Trucking & Logistics Inc.	Replacement	\$ 50,000
219	643-35	F & D Enterprise	Retrofit Level 3 PM	\$ 5,000
220	818-6545	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
221	696-16	Nuckles Oil Co. Inc. DBA Merit Oil Co.	Replacement	\$ 40,000
222	699-107	Alpha Materials, Inc.	Replacement	\$ 60,000
223	218-290	Dalton Trucking Inc.	Replacement	\$ 30,000
224	643-42	F & D Enterprise	Retrofit Level 3 PM	\$ 5,000
225	699-132	Alpha Materials, Inc.	Replacement	\$ 60,000
226	757-12	Jaime Avila	Replacement	\$ 50,000
227	274-2452	Apex Bulk Commodities LLC	Replacement	\$ 40,000
228	207-011	F&F Transport Services Inc.	Replacement	\$ 60,000
229	642-0002	Harbor Express, Inc.	Replacement	\$ 50,000
230*				
231	218-291	Dalton Trucking Inc.	Replacement	\$ 30,000
232	313-1008	Tck Leasing Corp.	Replacement	\$ 60,000
233	801-000	Jose A. Jovel Pineda	Replacement	\$ 50,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
234	309-417	CMC Steel Fabricators, Inc. DBA CMC Rebar	Replacement	\$ 60,000
235	362-21	Julio Carballo DBA Jcc Transport	Replacement	\$ 50,000
236	215-1062	Arakelian Enterprises Inc. DBA United Waste Recycling/Transfer, Athens Services	Replacement	\$ 60,000
237	581-004	Francisco Sanchez	Replacement	\$ 40,000
238	313-1009	TCK Leasing Corp.	Replacement	\$ 60,000
239	617-1	Jose David Solis	Replacement	\$ 40,000
240	699-119	Alpha Materials, Inc.	Replacement	\$ 60,000
241	472-000	Rafael Ochoa	Replacement	\$ 50,000
242	218-166	Dalton Trucking Inc.	Replacement	\$ 20,000
243	827-101	Juan Marquez	Replacement	\$ 50,000
244	606-001	Andres Pineda	Replacement	\$ 50,000
245	710-105	Vasquez Trucking Inc.	Replacement	\$ 60,000
246	742-TR038	J & J Transportation Vinson, Inc.	Replacement	\$ 50,000
247	317-4054	Saul Vallecillo	Replacement	\$ 40,000
248	463-123	South Bound Express, Inc.	Replacement	\$ 60,000
249	274-2422	Apex Bulk Commodities LLC	Replacement	\$ 40,000
250	098-53	Ron & Sons Trucking, Inc.	Replacement	\$ 50,000
251	649-1010	Hansen Beverage Company	Replacement	\$ 40,000
252	630-51	Transloading Express	Replacement	\$ 60,000
253	473-000	Salvador Antonio Palacios	Replacement	\$ 50,000
254	828-360	Highway Freight Systems Inc.	Replacement	\$ 50,000
255	353-01	James S. Kirk	Replacement	\$ 40,000
256	274-2424	Apex Bulk Commodities LLC	Replacement	\$ 40,000
257	043-000	Bernard Edward Pantus DBA Get'Er Done Trucking	Replacement	\$ 57,500
258	133-329	Redlands Fruit Company	Replacement	\$ 40,000
259	218-318	Dalton Trucking Inc.	Replacement	\$ 15,000
260	721-12	DDR Transport Inc.	Replacement	\$ 50,000
261	027-000	Elind Guardado Monge	Replacement	\$ 50,000
262	270-10	Kelly Freight Services, Inc.	Replacement	\$ 40,000
263	486-000	Fermin Ibarra	Replacement	\$ 50,000
264	696-26	Nuckles Oil Co. Inc. DBA Merit Oil Co.	Replacement	\$ 40,000
265	305-149	KKW Trucking, Inc.	Replacement	\$ 60,000
266	463-130	South Bound Express, Inc.	Replacement	\$ 60,000
267	465-003	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
268	463-124	South Bound Express, Inc.	Replacement	\$ 60,000
269	274-2405	Apex Bulk Commodities LLC	Replacement	\$ 40,000
270	014-000	Jose Adrian Martinez	Replacement	\$ 50,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
271	206-000	Rick Blevins, Jr.	Replacement	\$ 50,000
272	463-132	South Bound Express, Inc.	Replacement	\$ 60,000
273	075-002	M S International, Inc.	Replacement	\$ 60,000
274	218-321	Dalton Trucking Inc.	Replacement	\$ 30,000
275	075-001	M S International, Inc.	Replacement	\$ 60,000
276	465-002	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
277	711-000	Bernardino Chavez DBA Chavez Transportation	Replacement	\$ 40,000
278	465-005	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
279	743-7156	New Century Intermodal Inc.	Replacement	\$ 50,000
280	461-19	Mobil Delivery Service DBA Diamond Oil Service	Replacement	\$ 60,000
281	766-27	Glenda Lima Valdez	Replacement	\$ 50,000
282	165-3097	RRM Properties	Replacement	\$ 60,000
283	766-25/1115	Glenda Lima Valdez	Replacement	\$ 50,000
284	098-35	Ron & Sons Trucking, Inc.	Replacement	\$ 50,000
285	643-31	F & D Enterprise	Retrofit Level 3 PM	\$ 5,000
286	818-175	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
287	098-52	Ron & Sons Trucking, Inc.	Replacement	\$ 50,000
288	463-121	South Bound Express, Inc.	Replacement	\$ 60,000
289	225-PO41285	99 Cents Only Stores	Replacement	\$ 40,000
290	821-30123674	Unified Grocers Inc.	Replacement	\$ 60,000
291	505-000	Phu Huynh	Replacement	\$ 50,000
292	566-000	Amilicar Dagoberto Villanueva DBA Big Dog Trucking	Replacement	\$ 40,000
293	313-107	Tck Leasing Corp.	Replacement	\$ 60,000
294	491-605	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
295	791-000	Alejandro Cabanas	Replacement	\$ 50,000
296	305-170	West Coast Leaseways, LLC	Replacement	\$ 40,000
297	218-319	Dalton Trucking Inc.	Replacement	\$ 30,000
298	490-000	MGJ Corona Trucking	Replacement	\$ 50,000
299	491-141	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
300	220-000	Martha Corina Perdomo	Replacement	\$ 40,000
301	189-000	Tanis Hernandez	Replacement	\$ 50,000
302	073-008	Dura Freight Inc	Replacement	\$ 60,000
303	510-000	Jose Guadalupe Hernandez	Replacement	\$ 50,000
304	415-000	Rene Quevedo	Replacement	\$ 50,000
305	818-6574	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
306	653-6251	Foster Poultry Farms	Replacement	\$ 60,000



<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
307	465-006	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
308	362-20	Julio Carballo DBA Jcc Transport	Replacement	\$ 50,000
309	465-004	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
310	696-12	Nuckles Oil Co. Inc. DBA Merit Oil Co.	Replacement	\$ 40,000
311	107-000	Rafael Martinez Caldera DBA M&L Trucking	Replacement	\$ 50,000
312	180-000	Miguel Perdomo DBA Miguel Perdomo Trucking	Replacement	\$ 50,000
313	208-754	RRM Properties	Replacement	\$ 60,000
314	781-000	Julio Alberto Gutierrez	Replacement	\$ 30,000
315	668-000	Jose Benedicto Estrada Perez	Replacement	\$ 50,000
316	378-604	Westside Building Materials	Replacement	\$ 40,000
317	208-984	RRM Properties	Replacement	\$ 60,000
318	256-000	Rigoberto Moreno	Replacement	\$ 50,000
319	818-6559	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
320	045-000	Ownby Trucking	Replacement	\$ 50,000
321	609-P408	Matheson Trucking Inc.	Replacement	\$ 40,000
322	068-000	Manuel Davila	Replacement	\$ 50,000
323	818-6568	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
324	200-000	Oscar Munoz Moreno	Replacement	\$ 50,000
325	520-5103	Parkhouse Tire Service Inc.	Replacement	\$ 40,000
326	024-000	Boyeye Corporation	Replacement	\$ 50,000
327	273-16	Bro Pak Inc.	Replacement	\$ 40,000
328	818-12108	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
329	294-000	Ronald Arnabdo Gonzalez	Replacement	\$ 50,000
330	001-000	Marco Tulio Sanabria	Replacement	\$ 50,000
331	561-000	Mario E. Canales	Replacement	\$ 30,000
332	818-13113	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
333	818-13117	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
334	273-9	Bro Pak Inc.	Replacement	\$ 40,000
335	818-212	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
336	484-000	Jose Refugio Huizar	Replacement	\$ 50,000
337	465-010	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
338	818-12101	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
339	491-139	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
340	465-009	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
341	037-000	Chong Hyun Song	Replacement	\$ 50,000
342	461-20	Mobil Delivery Service DBA Diamond Oil Service	Replacement	\$ 60,000
343	491-129	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
344	465-007	John C. Dalton Enterprises, Inc.	Replacement	\$ 50,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
345	465-001	John C. Dalton Enterprises, Inc.	Replacement	\$ 50,000
346	818-13114	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
347	491-506	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
348	818-6564	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
349	489-000	Agustin Alamilla	Replacement	\$ 40,000
350	818-12106	Anthony H. Osterkamp Jr.	Replacement	\$ 40,000
351	689-2266	Guadalupe Sanchez	Replacement	\$ 50,000
352	273-23	Bro Pak Inc.	Replacement	\$ 40,000
353	609-P1013	Matheson Trucking Inc.	Replacement	\$ 60,000
354	305-169	West Coast Leaseways, LLC	Replacement	\$ 40,000
355	465-008	John C. Dalton Enterprises, Inc.	Replacement	\$ 30,000
356	587-245	Pacific High Leasing, LLC	Replacement	\$ 60,000
357	491-698	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
358	227-000	Israel A. Leon	Replacement	\$ 50,000
359	818-12103	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
360	172-204	Palomar Mountain Premium Spring Water LLC	Replacement	\$ 40,000
361	172-108	Palomar Mountain Premium Spring Water LLC	Replacement	\$ 40,000
362	511-000	Enrique Varela	Replacement	\$ 50,000
363	172-107	Palomar Mountain Premium Spring Water LLC	Replacement	\$ 40,000
364	092-1544	Oak Harbor Freight Lines Inc	Replacement	\$ 40,000
365	749-000	Juan A. Rousselin	Replacement	\$ 50,000
366	273-25	Bro Pak Inc.	Replacement	\$ 40,000
367	818-160	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
368	818-13201	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
369	491-136	Lee Jennings Target Express, Inc.	Replacement	\$ 40,000
370	023-614	Beauchamp Distributing Company	Replacement	\$ 30,000
371	818-3550	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
372	515-000	Dennie Manning Concrete, Inc. DBA D & K Concrete	Replacement	\$ 40,000
373	172-202	Palomar Mountain Premium Spring Water LLC	Replacement	\$ 40,000
374	172-201	Palomar Mountain Premium Spring Water LLC	Replacement	\$ 40,000
375	818-3605	Anthony H. Osterkamp Jr.	Replacement	\$ 60,000
376	172-203	Palomar Mountain Premium Spring Water LLC	Replacement	\$ 40,000
377	584-16	Cerenzia Foods Inc.	Replacement	\$ 40,000
378	073-009	Dura Freight Inc	Replacement	\$ 60,000
379	463-116	South Bound Express, Inc.	Replacement	\$ 60,000

<b>Ranking</b>	<b>AQMD Project ID</b>	<b>Applicant Name</b>	<b>Project Option</b>	<b>Maximum Prop1B Award</b>
380	023-636	Beauchamp Distributing Company	Replacement	\$ 30,000
381	251-300	City Logistics & Transport Inc.	Replacement	\$ 38,000
382	208-758	RRM Properties	Replacement	\$ 60,000
383	208-362	RRM Properties	Replacement	\$ 60,000
384	758-305	Heimark Distributing Co LLC	Replacement	\$ 50,000
385	305-152	Furniture Transportation System, Inc	Replacement	\$ 40,000

Note (\*): After initially approving the projects on the back-up list, CARB deemed these projects ineligible due to a change in ownership affecting the old diesel truck identified in the application after AQMD's solicitation period closed.

**ERRATA SHEET  
AGENDA NO. 6  
SEPTEMBER 7, 2012**

**Recognize Funds and Approve Additional Truck Projects under “Year 3”  
Proposition 1B-Goods Movement Program**

The following seven (7) applicants identified in the table below are hereby removed from this item of the Governing Board meeting, since the applicants did not submit their Campaign Contribution Forms or have decided not to go forward with their project(s).


<b>Project ID</b>	<b>Rank</b>	<b>Applicant Name</b>	<b>Project Type</b>	<b>Maximum Prop 1B Award</b>
798-000	16	Jose Trinidad	Replacement	\$ 50,000
497-000	93	Sergio Ortiz Ramos	Replacement	\$ 50,000
730-D	137	Star Milling Company	Replacement	\$ 55,000
335-000	206	Antonio Hernandez	Replacement	\$ 48,000
691-23	208	Jose Herrera	Replacement	\$ 60,000
691-20	209	Jose Herrera	Replacement	\$ 60,000
473-000	253	Salvador Antonio Palacios	Replacement	\$ 50,000
206-000	271	Rick Blevins, Jr.	Replacement	\$ 50,000

In addition, one of the applicant’s name needs to be corrected from South California Fueling Transport, Inc. to South California Fueling Transportation, Inc.

<b>Project ID</b>	<b>Rank</b>	<b>Applicant Name</b>	<b>Project Type</b>	<b>Maximum Prop 1B Award</b>
066-001	62	South California Fueling Transportation, Inc.	Replacement	\$ 60,000

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 7

**PROPOSAL:** Authorize Acquisition of Six Advanced Technology Vehicles for AQMD's Alternative Fuel Vehicle Demonstration Program 

**SYNOPSIS:** AQMD tests and demonstrates new vehicles with low- and zero-emission technologies as they become available. This action is to lease two Chevrolet Volt extended-range electric vehicles, two Mercedes F-cell fuel cell vehicles and two Honda Fit electric vehicles. Total cost to the AQMD for these six vehicles will not exceed \$119,000 from the Clean Fuels Fund (31).

**COMMITTEE:** Technology, July 27, 2012, Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Authorize the transfer of \$119,000 from the Clean Fuels Fund (31) to the FY 2012-13 Budget of Science & Technology Advancement, Services and Supplies Major Object, Rents and Leases Equipment Account;
2. Authorize the Procurement Manager to waive publication requirements for advertised procurements and lease two 2012 Chevrolet Volt extended-range electric vehicles for three years at a cost not to exceed \$50,000;
3. Authorize the Executive Officer to execute the following leases:
  - A. Two Mercedes F-cell fuel cell vehicles from Fletcher Jones Mercedes Benz for two years at a cost not to exceed \$37,000; and
  - B. Two Honda Fit electric vehicles from Penske Honda of Ontario for three years at a cost not to exceed \$32,000.

Barry R. Wallerstein, D.Env.  
Executive Officer

CSL:MMM:DS:LHM

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**Background**

The AQMD demonstrates a number of advanced technology vehicles to help support the development and deployment of cleaner advanced technology and educate consumers at

public outreach events. There are currently a variety of plug-in hybrid electric, electric, and fuel cell vehicles in the AQMD Alternative Fuel Vehicle Demonstration Program.

In February 2012, the Board approved funding for three BMW ActiveEs, two Mercedes F-cells, and two Chevrolet Volts, and the transfer of funds from the Clean Fuels fund to AQMD budget accounts for expenditure in FY 2011-2012. The BMW ActiveEs were acquired prior to the end of FY 2011-2012, but the other four vehicles were not. Purchase quotes for Chevrolet Volts received after the February Board approval exceeded the approved funding and the lease rate amounts for these vehicles are lower. Mercedes provided a reduced lease amount without hydrogen fueling. In addition to requesting authorization to acquire two new Honda Fit EVs, staff is requesting transfer of Clean Fuels funds for the two Mercedes F-cell and two Chevrolet Volts in FY 2012-2013 for lower amounts than previously approved.

#### Chevrolet Volt

The Chevrolet Volt is a full performance four-passenger electric sedan with extended range. Volt is designed to travel about 35 miles at speeds up to 100 mph using the on-board battery pack, and the gasoline engine serves as a range extender providing several hundred miles of travel. The Volt powertrain includes a 150 hp electric motor which produces 273 lb-ft torque and a 1.4L, 80 hp four-cylinder gasoline engine. Energy is stored on board in a 16-kWh, T-shaped lithium-ion battery, which is currently supplied by Compact Power (LG Chem).

When the Volt is plugged in routinely and used for short trips, the engine may not need to start for extended periods of time. The Volt will fully recharge in about 10 hours using a standard 120V household outlet and the power cord supplied by GM. Using a dedicated 240V charger, the Volt will fully recharge in about 4 hours. The charging can be scheduled for off-peak hours, which can provide additional environmental benefits and lower cost. The Volt uses the SAE J1772 connector, which was adopted as the recommended practice for Level 1 and Level 2 charging for passenger vehicles in the United States in January 2011. Improvements for 2012 include California certification as an enhanced ATPZEV, which enables the 2012 Volt to qualify for solo-driver carpool lane use with new green decals until January 1, 2015.

#### Mercedes F-Cell

AQMD was one of the first lessees in California of the Mercedes A-class F-Cell, which had a range of approximately 100 miles with a top speed of 82 mph, and used gaseous hydrogen at 35 MPa (5,000 psi) as fuel. The new Mercedes B-class F-Cell is a four-door, five-passenger hatchback with a more powerful electric motor rated at 100 kW (134 horsepower), 214 lb-ft of torque, a range of up to 240 miles when refueled with 70 MPa gaseous hydrogen, and the top speed is about 106 mph.

AQMD's hydrogen fueling station has been in operation since 2004. With CEC AB 118 funding and Clean Fuels funding awarded to Air Products and Chemicals, Inc., AQMD is in the process of upgrading the station to increase capacity and provide hydrogen at both 35 and 70 MPa so it can also provide higher pressure hydrogen that maximizes the range of the new F-Cell vehicles.

The fuel cell is a proton exchange membrane fuel cell (PEMFC) designed by the Automotive Fuel Cell Cooperation (AFCC) Corporation (51% Daimler, 30% Ford, and 19% Ballard) to provide improved performance to drive the electric motor. The powertrain also incorporates a compact (35 kW output, 1.4 kWh capacity) lithium-ion battery, which is cooled using the car's air-conditioning system. The battery is capable of propelling the car for a short distance if hydrogen is depleted, and is designed to work in conjunction with the fuel cell stack by boosting power when necessary. Regenerative braking recharges the battery.

About 200 limited production B-Class vehicles are planned for deployment in California (Los Angeles and San Francisco Bay Area) and Europe only by closed-end lease for two years. The certification of the F-Cell as a ZEV enables it to qualify for solo-driver carpool lane use until January 1, 2015.

#### Honda Fit EV

The Honda Fit Electric Vehicle, which received the highest federal fuel economy rating ever granted by the U.S. EPA of 118 miles per gasoline gallon equivalent (MPGe), is Honda's first battery powered vehicle in twenty years. The Fit EV has a 20 kilowatt-hour, lithium-ion battery pack and can travel about 82 miles before needing to charge. When employing a 240-volt 32 Amp charging unit, the Fit can charge in less than three hours. When using a conventional 120-volt outlet, it can charge in about 12 hours.

The Fit includes a 3-mode electric drive system which produces a maximum 123 horsepower and 189 torque (lb-foot). The maximum speed that this motor can reach is 90 miles per hour. Also included in the Fit, is both a Normal and Sport mode to maximize efficiency and improve acceleration. The vehicle provides a user-friendly interactive remote to allow the driver to view state of charge, turn on the air conditioning, and activate charging. This 5-passenger hatchback is now available for closed-end, 3-year leasing, but has limited availability through October of 2014. The certification of the Fit electric vehicle as a ZEV enables it to qualify for solo-driver carpool lane use until January 1, 2015.

#### **Proposal**

This action is to lease two Chevrolet Volt California low emission extended-range electric vehicles, two Mercedes F-cell fuel cell vehicles, and two Honda Fit electric vehicles for AQMD's Alternative Fuel Vehicle Demonstration Program at a cost not to exceed \$119,000 from the FY 2012-13 Budget of Science & Technology Advancement,

Services and Supplies Major Object, Rents & Leases Equipment Account. The total cost not to exceed \$119,000 excludes hydrogen for the Mercedes F-Cell vehicles but includes 8.75 percent Los Angeles County sales/use tax and all other fees.

**Benefits to AQMD**

The proposed project is included in the *Technology Advancement Office 2012 Plan Update* under “Electric and Hybrid Technologies” and “Hydrogen and Fuel Cell Technologies and Infrastructure.” The purpose of including a variety of advanced technology passenger vehicles in AQMD’s Alternative Fuel Vehicle Demonstration Program is to showcase them and illustrate AQMD’s own commitment to develop and deploy these advanced technologies. The AQMD supports CARB’s zero-emission-vehicle requirement and strives to educate public and private organizations regarding the benefits and characteristics of zero- and near-zero emission vehicles.

**Procurement Process**

Section VIII B(2) of the Procurement Policy and Procedure identifies six provisions under which detailed specifications or obtaining of bids may be waived by the Executive Officer or his designee. This request is made under provision B.2.c.(2): “The desired services are available from only the sole-source based upon one or more of the following reasons: The project involves the use of proprietary technology.” The request to waive publication requirements for advertised procurements in Section VII.A of the Procurement Policy and Procedure is because new 2012 Chevrolet Volts are currently available only from Chevrolet dealers that meet General Motor’s criteria for selling Volts. Due to limited availability of these new vehicles, an informal request for quotes from regional Chevrolet Volt dealers using selection criteria of 2012 California ATPZEV emissions certification, timely response, and favorable lease pricing will be solicited. The Honda Fit EV and Mercedes F-cell vehicles are limited production and available only by sole-source, closed-end lease to selected customers from limited dealerships.

**Resource Impact**

The total cost of these six vehicles will not exceed \$119,000 from the FY 2012-13 Budget of Science & Technology Advancement, Services & Supplies Major Object, Rents & Leases Equipment Account. In order to lease the Volts, multiple quotes will be solicited from regional Chevrolet dealers.

Vehicle	Cost	No. of Vehicles	Total*
2012 Chevrolet Volts ( 3-year lease with navigation package)	\$499/mo	2	\$50,000
Mercedes F-cell (2-year closed-end lease)	\$549/mo	2	\$37,000
Honda Fit EV (3-year closed-end lease)	\$389/mo (plus tax)	2	\$32,000
Total			\$119,000

\*includes tax and all fees



Sufficient funds are available in the Clean Fuels Fund, established as a special revenue fund resulting from the state-mandated Clean Fuels Program. The Clean Fuels Program, under Health and Safety Code Sections 40448.5 and 40512 and Vehicle Code Section 9250.11, establishes mechanisms to collect revenues from mobile sources to support projects to increase the utilization of clean fuels, including the development of the necessary advanced enabling technologies. Funds collected from motor vehicles are restricted, by statute, to be used for projects and program activities related to mobile sources that support the objectives of the Clean Fuels Program.

**ERRATA SHEET FOR AGENDA #7**  
Authorize Acquisition of Six Advanced Technology Vehicles for  
AQMD's Alternative Fuel Vehicle Demonstration Program

Kindly modify the text in the Board Letter in the four places listed below with the following language:

“2012” Chevrolet Volts to “*2012 or newer*”

**RECOMMENDED ACTION #2**

**BACKGROUND, Paragraph 4, last sentence**

**PROCUREMENT PROCESS, fourth sentence**  
and “~~2012~~ California ATPZEV” **in fifth sentence**

**RESOURCE IMPACT, Table**

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 8

**PROPOSAL:** Execute Contract with Legal Counsel to Provide Representation in Employment Litigation Matter

**SYNOPSIS:** It has become necessary to retain outside legal counsel to advise and represent the District in an employment-related litigation matter. This action is to authorize the Executive Officer to amend an existing contract with Paul Hastings LLP for a total contract amount not to exceed \$200,000.

**COMMITTEE:** Not Applicable

**RECOMMENDED ACTIONS:**

Authorize the Executive Officer to amend the existing contract with Paul Hastings LLP to provide legal services for a total amount not to exceed \$200,000.

Barry R. Wallerstein, D.Env.  
Executive Officer

AJO:vmr

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**Background**

The District is involved in employment lawsuits, and it is necessary to contract with experienced outside counsel for advice and representation in the on-going lawsuits.

**Proposal**

Paul Hastings LLP will be involved in advising and representing the District in an on-going employment litigation matter. A contract for \$50,000 has been executed by the Executive Officer. Staff requests that the Board authorize the Executive Officer to amend the contract with the firm of Paul Hastings LLP to authorize an additional \$150,000 to provide legal services in an amount not to exceed \$200,000.

**Sole Source Justification**

AQMD's Procurement Policy, Section VIII B2, provides for a waiver of formal bid processes under certain circumstances based upon documentation justifying a sole-source award. The award to Paul Hastings LLP is justified pursuant to Procurement Policy Section VIII B2(d), other circumstances exist justifying a sole-source award, subdivision (4), level-of-effort, expert consultation services, in view of the need for immediate and significant work involving special expertise in employment law. Paul Hastings LLP has special expertise based on the level of experience and prior involvement.

**Resource Impacts**

Sufficient funds are available in Administrative & Human Resources' FY 2012-13 Budget, Professional & Services account.

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 9

**PROPOSAL:** Amend Contracts to Provide Short- and Long-Term Systems Development, Maintenance and Support Services

**SYNOPSIS:** AQMD currently has contracts with several companies for short- and long-term systems development, maintenance and support services. These contracts are periodically amended to add budgeted funds as additional needs are defined. This action is to amend the contracts approved by the Board to add funding of \$429,200 for needed development and maintenance work. Funds for this purchase are included in the FY 2012-13 Budget.

**COMMITTEE:** Administrative, July 20, 2012, Recommended for Approval

**RECOMMENDED ACTION:**

Authorize the Executive Officer to execute amendments to the contracts for systems development services in the amount of \$209,200 to Sierra Cybernetics, and \$220,000 to Varsun eTechnologies for the specific task orders listed in Attachment 1.

Barry R. Wallerstein, D.Env.  
Executive Officer

JCM:OCM:tsh2:agg

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**Background**

At the September 9, 2011 meeting, the Board authorized staff to initiate level-of-effort contracts with several vendors for systems development, maintenance and support services. At the time these contracts were executed, it was expected that they would be modified in the future to add funding from approved budgets as system development requirements were identified and sufficiently defined so that task orders could be prepared.

The contracts are Basic Ordering Agreements: Individual task orders are issued on both a competitive and sole-source basis (depending on the size and complexity of the systems), after review of prior successful experience of the company and associated administrative costs of the bid process relative to the costs associated with the work effort.

System development and maintenance efforts are currently needed (see Attachment 1) to enhance system functionality and to provide AQMD staff with additional automation for improving productivity. The estimated cost to complete the work on these additional tasks exceeds the amount of funding in the existing contracts.

The current contracts are for one year with the option to renew for two one-year periods. Renewal of these contracts is contingent upon performance, competitiveness, percent of tasks bid and overall customer satisfaction.

This item is listed on the “Status Report on Major Projects for Information Management.”

**Proposal**

Staff proposes the contracts be amended to add funding of \$429,200 in the amount of \$209,200 to Sierra Cybernetics, and \$220,000 to Varsun eTechnologies for the specific task orders listed in Attachment 1.

**Resource Impacts**

Sufficient funding is included in the FY 2012-13 Budget.

**Attachment(s)**

Attachment 1 - Task Order Summary

## Attachment 1 – Task Order Summary

### Section A – Funding Totals by Contract

<b>Contractor</b>	<b>Previous Funding</b>	<b>This Addition</b>	<b>Total Funding</b>
CMC Americas, Inc	\$174,700	\$0	\$174,700
Prelude Systems, Inc.	\$50,000	\$0	\$50,000
Sierra Cybernetics	\$433,900	\$209,200	\$643,100
Varsun eTechnologies	\$315,300	\$220,000	\$535,300
<b>TOTAL</b>	<b>\$973,900</b>	<b>\$429,200</b>	<b>\$1,403,100</b>

### Section B – Task Orders Scheduled for Award

<b>TASK</b>	<b>DESCRIPTION</b>	<b>ESTIMATE</b>	<b>AWARDED TO</b>
CLASS Maintenance: Web Application and Website Support	Ongoing maintenance and support for AQMD's suite of Web Applications and Web Services	\$109,200	Sierra
CLASS Maintenance: Database and Client/Server Support	Ongoing maintenance and support for AQMD's client/server systems and enterprise database	\$100,000	Sierra
PeopleSoft HRMS Upgrade	Upgrade the HRMS and Finance Payroll system modules from version 9.0 to 9.1 to maintain tax and regulatory system support	\$220,000	Varsun
		<b>\$429,200</b>	

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 10

PROPOSAL: Appoint Alternate Engineer Member to AQMD Hearing Board

SYNOPSIS: The term of office for the Hearing Board Alternate Engineer Member expired June 30, 2012. The Advisory Committee interviewed candidates at its meeting on March 28, 2012, and made its recommendation to the Administrative Committee. The Administrative Committee interviewed candidates at its meeting on May 11, 2012, and decided not to recommend either of the two candidates interviewed, but to continue the item to a subsequent meeting and interview additional individuals from the pool of qualified engineer member/alternate candidates. This action is to appoint an alternate engineer member to fill the new term.

COMMITTEE: Administrative, May 11 and July 20, 2012; Recommended for Approval

**RECOMMENDED ACTION:**

Appoint Thomas J. McCabe, Jr. to the AQMD Hearing Board as Alternate Engineer Member for the term which commenced July 1, 2012 for a period ending June 30, 2015.

Barry R. Wallerstein, D.Env.  
Executive Officer

SM

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**Background**

Health and Safety Code Section 40501.1(b) requires the AQMD to appoint a Hearing Board Advisory Committee composed of one representative appointed by each of the Counties of Los Angeles, Orange, Riverside, and San Bernardino, and the City of Los Angeles. A highly qualified group of individuals served on the Advisory Committee for this recruitment. They are:



City of Los Angeles	Omar Moghaddam, Manager, Regulatory Affairs Div., City of Los Angeles Sanitation Bureau
County of Los Angeles	Robert A. Wyman, Jr., Attorney at Law, Latham & Watkins LLP
County of Orange	Ben Seybold, Senior Vice President, CB Richard Ellis
County of Riverside	Buford Crites, Board Consultant to Governing Board Member John J. Benoit
County of San Bernardino	Albert Arteaga, M.D., LaSalle Medical Associates

At its meeting on March 28, 2012, the Advisory Committee interviewed five candidates for Engineer Member and Alternate Engineer Member and recommended that the top three engineer candidates be referred to the Administrative Committee for interviews. The Administrative Committee interviewed the candidates at its meeting on May 11, 2012, and recommended that the Board reappoint incumbent Edward Camarena as Engineer Member for the term commencing July 1, 2012 and ending June 30, 2015. The Committee members were concerned that the two candidates interviewed for the alternate member for the engineer position might have conflicts of interest at this time, as they were consultants and assisted businesses in obtaining permits from AQMD. The Committee decided to invite the remaining alternate engineer candidates to a subsequent Administrative Committee meeting to be interviewed for selection as the alternate engineer member. The following candidates were subsequently contacted and invited for interview:

- 1) Thomas J. McCabe, Jr.**
- 2) Adel Sharif**
- 3) Parfait Voundi**

## **Proposal**

After interviewing each of the candidates, the Administrative Committee recommended that the Board appoint Thomas J. McCabe, Jr. as Alternate Engineer Member, for the term July 1, 2012 through June 30, 2015. A summary of Mr. McCabe's qualifications are set forth below.

### **Alternate Engineer Member**

**Thomas J. McCabe, Jr.** – Mr. McCabe has been the Corporate Director of Environmental, Health and Safety for Northrop Grumman Corporation since 2009, and previously held the positions of Corporate Manager and Administrator in Environmental, Health and Safety from 1982 to 2000 with the organization. Mr. McCabe began his career with the United States Navy in 1971 and held assignments in the Safety, Health and Environment division. Mr. McCabe holds a B.S. in Marine Engineering from the United States Merchant Marine Academy, an MBA from the University of California, Los Angeles, and a Juris Doctorate from The John Marshall School of Law, Chicago, IL.

### **Fiscal Impacts**

Sufficient funds are budgeted each year to compensate those who serve on the Hearing Board.

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 11

**PROPOSAL:** Approve Contract Awards and Modifications and Fund Transfer for Miscellaneous Costs in FY 2012-13 Approved by MSRC

**SYNOPSIS:** The MSRC approved multiple new contracts and/or modifications under the FY 2011-12 Work Program. These include awarding new contracts under the Local Government Match, Alternative Fuel Engines for On-Road Heavy Duty Vehicles, Alternative Fuel Infrastructure, Bikeshare, and Rideshare Thursday Public Awareness Programs. Additionally, every year the MSRC adopts an Administrative Budget which includes transference of funds to the AQMD Budget to cover administrative expenses. At this time the MSRC seeks Board approval of these contract awards and the fund transfer.

**COMMITTEE:** Mobile Source Air Pollution Reduction Review, August 16, 2012, Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Approve the award of 23 contracts totaling \$2,592,926 under the Local Government Match Program as part of approval of the FY 2011-12 AB 2766 Discretionary Fund Work Program, as described in this letter and as follows:
  - a. A contract with the Coachella Valley Association of Governments (CVAG) in an amount not to exceed \$250,000 for street sweeping operations in the Coachella Valley;
  - b. A contract with the City of Long Beach in an amount not to exceed \$26,000 for electric vehicle charging stations;
  - c. A contract with the Coachella in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
  - d. A contract with the City of Santa Ana in an amount not to exceed \$64,000 for electric vehicle charging stations and the expansion of their existing CNG station;
  - e. A contract with the City of Redlands in an amount not to exceed \$90,000 for the purchase of up to three heavy-duty natural gas vehicles;
  - f. A contract with the City of Duarte in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;

- g. A contract with the City of Anaheim in an amount not to exceed \$68,977 for electric vehicle charging stations;
  - h. A contract with the City of Chino Hills in an amount not to exceed \$87,500 for the expansion of their existing CNG station;
  - i. A contract with the City of Hemet in an amount not to exceed \$60,000 for the purchase of up to two heavy-duty natural gas vehicles;
  - j. A contract with the County of San Bernardino in an amount not to exceed \$250,000 for the installation of a new CNG station;
  - k. A contract with the City of Baldwin Park in an amount not to exceed \$400,000 for the installation of a new CNG station;
  - l. A contract with the City of Irvine in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
  - m. A contract with the City of Orange in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
  - n. A contract with the City of La Palma in an amount not to exceed \$20,000 for the purchase of up to two liquefied petroleum gas medium-duty vehicles;
  - o. A contract with the City of Rialto in an amount not to exceed \$57,958 for electric vehicle charging stations;
  - p. A contract with the City of Baldwin Park in an amount not to exceed \$463,650 for electric vehicle charging stations;
  - q. A contract with the City of Bellflower in an amount not to exceed \$270,000 for electric vehicle charging stations;
  - r. A contract with the City of Whittier in an amount not to exceed \$165,000 for the expansion of their existing CNG station;
  - s. A contract with the City of Mission Viejo in an amount not to exceed \$60,000 for electric vehicle charging stations;
  - t. A contract with the City of Palm Desert in an amount not to exceed \$77,385 for electric vehicle charging stations;
  - u. A contract with the City of Manhattan Beach in an amount not to exceed \$10,000 for the purchase of a natural gas medium-duty vehicle;
  - v. A contract with the City of Cathedral City in an amount not to exceed \$25,000 for street sweeping operations in the Coachella Valley; and
  - w. A contract with the City of Coachella in an amount not to exceed \$27,456 for street sweeping operations in the Coachella Valley;
2. Approve contract award to Krisda Inc. for the repower of up to 25 on-road heavy-duty vehicles, in an amount not to exceed \$625,000, under the Alternative Fuel Engines for On-Road Heavy-Duty Vehicles Program as part of approval of the FY 2011-12 AB 2766 Discretionary Fund Work Program, as described in this letter;
  3. Approve contract award to Orange County Transportation Authority for maintenance facility modifications in Anaheim and Garden Grove, in an amount not to exceed \$75,000, under the Alternative Fuel Infrastructure Program as part of approval of the FY 2011-12 AB 2766 Discretionary Fund Work Program, as described in this letter;

4. Approve the award of two contracts totaling \$724,000 under the Bikeshare Program as part of the approval of FY 2011-12 AB 2766 Discretionary Fund Work Program, as described in this letter and as follows:
  - a. A contract with the City of Santa Monica in an amount not to exceed \$500,000 for the Westside Bikeshare Project; and
  - b. A contract with OCTA in an amount not to exceed \$224,000 for the Orange County Bikeshare Pilot Project;
5. Approve contract award to Fraser Communications to develop and implement a “Rideshare Thursday” public awareness campaign, in an amount not to exceed \$998,669, under the Rideshare Thursday Public Awareness Program as part of the approval of the FY 2011-12 AB 2766 Discretionary Fund Work Program, as described in this letter;
6. Transfer \$63,360 from the AB 2766 Discretionary Fund, Special Fund 23, to the FY 2012-13 Budget of Science and Technology Advancement, Services and Supplies Major Object, to facilitate the payment of MSRC Miscellaneous Direct and Travel Costs, as provided in Table 1 of this letter;
7. Authorize MSRC the authority to adjust contract awards up to five percent, as necessary and previously granted in prior work programs; and
8. Authorize the Chairman of the Board to execute contracts under FY 2011-12 AB 2766 Discretionary Fund Work Program, as described above and in this letter.

Greg Winterbottom  
Chair, MSRC

CSL:HH:CR

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### **Background**

In September 1990 Assembly Bill 2766 was signed into law (Health & Safety Code Sections 44220-44247) authorizing the imposition of 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 subvented to the 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.

For the FY 2011-12 Work Program, the MSRC selected categories and targeted funding amounts in December 2011. Several solicitation documents have already been developed and released. The MSRC considered recommended awards under the Local Government Match, On-Road Heavy-Duty Vehicles, Alternative Fuel Infrastructure, Bikeshare and Rideshare Thursday Public Awareness Campaign Programs. The MSRC also considered their FY 2012-13 Administrative Budget. Details are provided below in the Proposals section.

## **Outreach**

In accordance with AQMD's Procurement Policy and Procedure, public notices advertising the Local Government Match, On-Road Heavy-Duty Vehicles, Alternative Fuel Infrastructure, Bikeshare and Rideshare Thursday Public Awareness Campaign solicitation documents and inviting bids were published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin. In addition, the solicitations were advertised in the Desert Sun newspaper for expanded outreach in the Coachella Valley.

Additionally, potential bidders may have been notified utilizing AQMD's own electronic listing of certified minority vendors. Notice of the solicitations has been e-mailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at AQMD's website (<http://www.aqmd.gov>). Information was also available on AQMD's bidder's 24-hour telephone message line (909) 396-2724. Further, the solicitations were posted on the MSRC's website at <http://www.cleantransportationfunding.org> and electronic notifications were sent to those subscribing to this website's notification service.

## **Proposal Evaluation and Panel Composition**

Applications received in response to the Local Government Match, On-Road Heavy-Duty Vehicles, Alternative Fuel Infrastructure, Bikeshare and Rideshare Thursday Public Awareness Campaign solicitation documents were evaluated by members of the MSRC's Technical Advisory Committee (MSRC-TAC), a diverse group of individuals appointed by participating members as prescribed in the Health & Safety Code.

## **Proposals**

At its August 16, 2012 meeting, the MSRC considered recommendations from its MSRC-TAC and approved the following:

### **FY 2011-12 Local Government Match Program**

As part of the FY 2011-12 Work Program, the MSRC allocated \$6.5 million for the Local Government Match Program. A Program Announcement, #PA2012-14, was developed and released on March 2, 2012. The Local Government Match Program offers to co-fund qualifying alternative fuel vehicle purchases at a funding level of up to \$10,000 each for medium-duty and up to \$30,000 each for heavy-duty vehicles. Other categories in the FY 2011-12 Match Program include: alternative fuel infrastructure, up to a maximum of \$400,000 per project; and electric vehicle charging infrastructure, up to a maximum of \$500,000. Finally, \$250,000 is reserved for qualifying AB 2766 Subvention Fund recipients in the Coachella Valley to support regional street sweeping programs. In all categories funding is provided on a dollar-for-dollar match basis, and funding for all eligible entities shall be distributed on a first-come, first-served basis with a geographic minimum per county of \$812,500. The Program Announcement includes an open

application period which commenced April 10, 2012 and closed June 8, 2012. The MSRC previously awarded a total of \$2,873,000 to 11 projects. Consideration of a portion of one of the initial applications was deferred until the Program closed. Twenty-two additional applications were received prior to the submission deadline. At its August 16, 2012 meeting, the MSRC considered recommendations and approved funding totaling \$ 2,592,926 for 23 projects, as follows:

- a. A contract with the Coachella Valley Association of Governments (CVAG) in an amount not to exceed \$250,000 for street sweeping operations in the Coachella Valley;
- b. A contract with the City of Long Beach in an amount not to exceed \$26,000 for electric vehicle charging stations;
- c. A contract with the Coachella in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
- d. A contract with the City of Santa Ana in an amount not to exceed \$64,000 for electric vehicle charging stations and the expansion of their existing CNG station;
- e. A contract with the City of Redlands in an amount not to exceed \$90,000 for the purchase of up to three heavy-duty natural gas vehicles;
- f. A contract with the City of Duarte in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
- g. A contract with the City of Anaheim in an amount not to exceed \$68,977 for electric vehicle charging stations;
- h. A contract with the City of Chino Hills in an amount not to exceed \$87,500 for the expansion of their existing CNG station;
- i. A contract with the City of Hemet in an amount not to exceed \$60,000 for the purchase of up to two heavy-duty natural gas vehicles;
- j. A contract with the County of San Bernardino in an amount not to exceed \$250,000 for the installation of a new CNG station;
- k. A contract with the City of Baldwin Park in an amount not to exceed \$400,000 for the installation of a new CNG station;
- l. A contract with the City of Irvine in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
- m. A contract with the City of Orange in an amount not to exceed \$30,000 for the purchase of a natural gas heavy-duty vehicle;
- n. A contract with the City of La Palma in an amount not to exceed \$20,000 for the purchase of up to two liquefied petroleum gas medium-duty vehicles;
- o. A contract with the City of Rialto in an amount not to exceed \$57,958 for electric vehicle charging stations;
- p. A contract with the City of Baldwin Park in an amount not to exceed \$463,650 for electric vehicle charging stations;
- q. A contract with the City of Bellflower in an amount not to exceed \$270,000 for electric vehicle charging stations;
- r. A contract with the City of Whittier in an amount not to exceed \$165,000 for the expansion of their existing CNG station;

- s. A contract with the City of Mission Viejo in an amount not to exceed \$60,000 for electric vehicle charging stations;
- t. A contract with the City of Palm Desert in an amount not to exceed \$77,385 for electric vehicle charging stations;
- u. A contract with the City of Manhattan Beach in an amount not to exceed \$10,000 for the purchase of a natural gas medium-duty vehicle;
- v. A contract with the City of Cathedral City in an amount not to exceed \$25,000 for street sweeping operations in the Coachella Valley; and
- w. A contract with the City of Coachella in an amount not to exceed \$27,456 for street sweeping operations in the Coachella Valley.

#### FY 2011-12 On-Road Heavy-Duty Vehicles Program

As part of the FY 2011-12 Work Program, the MSRC allocated \$2.0 million to encourage owners of older heavy-duty diesel vehicles to repower their vehicles with new lower-emitting alternative fuel engines certified at a NO<sub>x</sub> emission level of 0.2 g/bhp-hr or lower. A Program Announcement, #PA2012-11, was developed and released on March 2, 2012, with a final submission deadline of June 1, 2012. The incentive level was set at \$25,000 per qualifying vehicle, and maximum funding per entity was capped at 30% of the total funds available (\$600,000). 25 application packages, all from the applicant Krisda Inc., were received by the deadline. The applications were found to meet Program requirements. As the Program was not fully subscribed, the MSRC elected to waive the “maximum funding per entity” limitation and approved a contract with Krisda Inc. in an amount not to exceed \$625,000 for the repower of up to 25 trucks with new LPG engines.

#### FY 2011-12 Alternative Fuel Infrastructure Program

As part of the FY 2011-12 Work Program, the MSRC allocated \$4.0 million for the implementation of new and expanded CNG and LNG refueling stations as well as modification of maintenance facilities to accommodate gaseous-fueled vehicles. A Program Announcement, #PA2012-10, was developed and released on March 2, 2012, with a final submission deadline of September 28, 2012. The MSRC previously considered ten applications and awarded a total of \$1,369,000 for those projects. One additional application, from Orange County Transportation Authority, has been received and evaluated for compliance with the requirements set forth in the Program Announcement. The project was found to meet all requirements. The MSRC approved a contract with Orange County Transportation Authority in an amount not to exceed \$75,000 for maintenance facility modifications in Anaheim and Garden Grove.

#### FY 2011-12 Bikeshare Program

As part of the FY 2011-12 Work Program, the MSRC allocated \$1.0 million for a program to facilitate and promote the implementation, demonstration, or expansion of shared bicycle facilities as a strategy to reduce motor vehicle-generated air pollution. The intent is to promote the use of bicycles as the transportation linkage between the commuter’s home or workplace and public transit stations. An RFP, #P2012-21, was



developed and released on April 6, 2012, with a final submission deadline of July 10, 2012. Proposals were required to offer co-funding in an amount equal to or greater than the amount of funding sought from MSRC. Two proposals were received and evaluated on: project scope; proposer/team qualifications; promotional, advertising and sponsorship plans; performance tracking; and proposed level of co-funding. The MSRC considered the proposals and approved funding totaling \$724,000 for the two proposals, as follows:

- a. A contract with Orange County Transportation Authority in an amount not to exceed \$224,000 to implement the Orange County Bike Share Pilot Project in partnership with the City of Fullerton, encompassing approximately 15 locations; and
- b. A contract with the City of Santa Monica in an amount not to exceed \$500,000 for to implement the Santa Monica/Westside Bikeshare Project, encompassing approximately 35 locations within the City and surrounding Westside Council of Governments cities.

#### FY 2011-12 Rideshare Thursday Program

As part of the FY 2011-12 Work Program, the MSRC allocated \$1,000,000 for a program to reintroduce a “Rideshare Thursday” public awareness campaign in the South Coast Air District. The goals of a new Rideshare Thursday campaign are to raise awareness and utilization of the region’s “511” services, increase the use of high occupancy vehicle lanes, and increase awareness and participation in local rideshare incentive programs. An RFP, #P2012-20, was developed and released on April 6, 2012, with a final submission deadline of June 26, 2012. The RFP established the following scoring criteria: campaign design, proposer qualifications, campaign implementation, and cost. A total of 12 proposals were received by the deadline. Proposals were evaluated and the top three ranked proposers were interviewed by a subcommittee comprised of members of the MSRC’s Technical Advisory Committee. The MSRC awarded a contract to Fraser Communications in an amount not to exceed \$998,669, with an option clause for an additional year of Rideshare Thursday advertising and outreach subject to approval by the MSRC and AQMD Board at a later date.

At this time the MSRC requests the AQMD Board to approve the contract awards as part of approval of the FY 2011-12 Work Program as outlined above. The MSRC also requests the Board to authorize the AQMD Chairman of the Board the authority to execute all agreements described in this letter. The MSRC further requests authority to adjust the funds allocated to each project specified in this Board letter by up to five percent of the project’s recommended funding. The Board has granted this authority to the MSRC for all past Work Programs.

#### **FY 2012-13 Administrative Budget**

Every year the MSRC adopts an Administrative Budget for the upcoming fiscal year to ensure costs remain within the five percent limitation. For FY 2012-13, the MSRC adopted an Administrative Budget in the amount of \$686,023, which is more than

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BOARD MEETING DATE: September 7, 2012

AGENDA NO. 12

PROPOSAL: Legislative and Public Affairs Report

SYNOPSIS: This report highlights June and July 2012 outreach activities of Legislative and Public Affairs, which include: Environmental Justice Update, Community Events/Public Meetings, Business Assistance, and Outreach to Business and Federal, State, and Local Government.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

DJA:MC:DM:JNS

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### **Background**

This report summarizes the activities of Legislative and Public Affairs for June and July 2012. The report includes four major areas: Environmental Justice Update, Community Events/Public Meetings (including the Speakers Bureau/Visitor Services, Communications Center, and Public Information Center), Business Assistance and Outreach to Business and Federal, State, and Local Governments.

## **ENVIRONMENTAL JUSTICE UPDATE**

The following are key environmental justice-related activities in which staff participated during June and July 2012. These events involve communities which suffer disproportionately from adverse air quality impacts.

- On June 13, staff assisted with the Clean Communities Working Group meeting in San Bernardino. The meeting was held at Omnitrans and featured a tour of their facility.
- On June 13, staff gave a presentation on the Draft 2012 Air Quality Management Plan (AQMP) to the Inland Empire Air Quality Committee. The Inland Empire Air Quality Committee is comprised of health officials, environmental and community organizations and others in the counties of San Bernardino and Riverside.
- On June 14, staff attended the Wilmington Chamber and Neighborhood Council meeting to update stakeholders on the Draft 2012 AQMP and other relevant air quality issues.
- On June 16, staff represented the District at the First African American Methodist Church 5K Walk and Health Fair to provide participants with information on air quality including the upcoming Lawnmower Exchange Program and Air Quality Management Plan.
- On July 3, staff showed AQMD's documentary film "The Right to Breathe" to the St. Philomena Catholic Church Parish Council in Los Angeles. After the viewing, the Council decided to set up screenings for their entire congregation as it is consistent with their environmental justice concerns. The Council will also share the film with neighboring Catholic Churches in Carson, San Pedro and Wilmington.
- On July 13, staff held a workshop on the Draft 2012 AQMP with local government representatives and environmental and health organizations. After the presentation, stakeholders asked questions and shared their comments from an environmental justice perspective with staff.
- On July 17, staff participated in the Boyle Heights Clean Communities Plan Working Group meeting. The Working Group received an update on projects in the community and discussed the broad range of air quality issues identified by stakeholders. A presentation on the Draft 2012 AQMP was also provided to the Working Group.

- On July 17, staff provided the keynote presentation and led workshops on air quality issues at the Southern California STEM Service Learning Institute held at Chaffey College in Chino. In addition to learning about general air quality issues, approximately 150 teachers at the Institute received information on the Draft 2012 AQMP and viewed AQMD’s documentary film “The Right to Breathe”.

## **COMMUNITY EVENTS/PUBLIC MEETINGS**

Each year, thousands of residents engage in valuable information exchanges through events and meetings that AQMD sponsors alone or in partnership with others. Attendees typically receive the following information: tips on reducing their exposure to smog and its health effects, clean air technologies and their deployment, invitations or notices of conferences, seminars, workshops and other public events, ways to participate in AQMD rule and policy development and assistance in resolving air quality-related problems. The events that AQMD staff attended and provided information and updates include:

- June 1 Faithful Collaboration in the Public Square Event, Zacatecas Café, Riverside
- June 2 2012 Science, Technology, Engineering and Math (STEM) Career and College Workshop and Conference, Palm Spring
- June 7 2nd Annual Valley Green Building Education Conference and Expo, California State University, Northridge
- June 9 6th Annual Sports Fair for Children, San Bernardino Valley College, San Bernardino
- June 9 City of Torrance Environmental Fair/City Yard Open House, Torrance
- June 13 AQMD’s San Bernardino Clean Communities Plan Working Group Meeting, Omnitrans, San Bernardino
- June 13 Move LA’s “LA’s Got New Mojo” Event, Union Station, Los Angeles
- June 14 SCE and AQMD’s Internal Plug-In Electric Vehicle Workshop, Southern California Edison, Customer Technical Application Center, Irwindale
- June 14 San Bernardino Association of Governments General Assembly, Ontario
- June 19 AQMD’s Community Plug-In Electric Vehicle Readiness Workshop, Diamond Bar
- June 21 Western Riverside Council of Governments 21<sup>st</sup> Annual General Assembly, Cabazon

- June 23 6th Annual Auto Club Employee Car Show, Costa Mesa
- June 23 8th Annual Tree Huggers Ball, Silverado Canyon
- June 25 Coachella Valley Association of Governments 39<sup>th</sup> General Assembly, Palm Desert
- July 4 3rd Annual Green Fastest Mile Event, South Pasadena
- July 14 2nd Annual Powerful Black Family Celebration, Van Ness Recreation Park, Los Angeles
- July 17 California Electronic Vehicle Codes & Standards Seminar, College of the Desert, Palm Desert
- July 21 32nd Annual Government Day Event, Panorama City
- July 28 32 Annual Cypress Community Festival, Cypress
- July 28-29 17<sup>th</sup> Annual Central Avenue Jazz Festival, South Los Angeles

### **Speakers Bureau/Visitor Services**

AQMD receives requests for staff to speak on a variety of air quality-related issues. The requests come from organizations such as trade associations, chambers of commerce, community-based groups, schools, hospitals and health-based organizations. AQMD also hosts visitors from around the world who meet with staff on a wide range of air quality issues.

- On Jun 7, staff provided a general overview presentation on the AQMD and information on air quality to over 100 students and teachers at Today's Fresh Start Charter School in Los Angeles.
- On June 14, staff presented a general overview on the AQMD and information on air quality to a group of 20 representatives from the Auto Design Center in Pasadena visiting the AQMD's Headquarters in Diamond Bar.
- On June 20, staff provided a general overview presentation and tour on the AQMD to a group of 18 students from the Epitome Academy in Diamond Bar.
- On July 31, staff gave a presentation on air quality and a tour of the AQMD to a group of 30 students and staff from the Youth Science Center in Hacienda Heights.

### **Communication Center Statistics**

The Communication Center handles calls on the AQMD main line, 1-800-CUT-SMOG<sup>®</sup> line and Spanish line. Calls received in the months of June and July 2012 are summarized below:

Main Line Calls	5,761
1-800-CUT-SMOG <sup>®</sup> Line	3,178
After Hours Calls*	947
Spanish Line Calls	<u>88</u>
Total Phone Calls	<u>9,974</u>

\* Saturdays, Sundays, holidays and after 7:00 p.m., Monday through Friday.

### **Public Information Center Statistics**

The Public Information Center (PIC) handles phone calls and walk-in requests for general information. Information for the months of June and July 2012 is summarized below:

Visitor Transactions	577
Packages Mailed Out	0
Calls Received by PIC Staff	87
Calls to Automated System	<u>3,308</u>
Total Phone Calls	<u>3,396</u>

E-mail Advisories Sent	96,691
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### **BUSINESS ASSISTANCE**

AQMD assists businesses by notifying them of proposed regulations so they can participate in the development of these rules. AQMD also works with other agencies and governments to identify efficient, cost-effective ways to reduce air pollution and shares that information broadly. Additionally, staff provides personalized assistance to small businesses both over the telephone and by on-site consultation. The information is summarized below.

- Conducted 9 free on-site consultations
- Provided permit application assistance to 310 companies
- Issued 54 clearance letters

Types of business assisted:

- ✓ Bearings manufacturing
- ✓ Battery manufacturing
- ✓ Furniture manufacturing
- ✓ Auto body shops
- ✓ Metal parts coating
- ✓ Building management
- ✓ Fiberglass products & manufacturing
- ✓ Foot products & manufacturing
- ✓ Construction
- ✓ Gun range
- ✓ Concrete pumping
- ✓ Restaurant
- ✓ Dry cleaners
- ✓ Gas station
- ✓ Metal plating

**OUTREACH TO BUSINESS AND FEDERAL, STATE, AND LOCAL GOVERNMENTS**

Field visits and communications were conducted with elected officials or staff from the following cities:

Alhambra, Agoura Hills, Aliso Viejo, Anaheim, Arcadia, Artesia, Avalon, Azusa, Baldwin Park, Banning, Beaumont, Bell, Bell Gardens, Bellflower, Beverly Hills, Big Bear Lake, Bradbury, Brea, Buena Park, Burbank, Calabasas, Calimesa, Canyon Lake, Carson, Cathedral City, Cerritos, Chino, Chino Hills, Claremont, Coachella, Colton, Commerce, Compton, Corona, Costa Mesa, Covina, Cudahy, Culver City, Cypress, Dana Point, Desert Hot Springs, Diamond Bar, Downey, Duarte, Eastvale, El Monte, El Segundo, Fontana, Fountain Valley, Fullerton, Garden Grove, Gardena, Glendale, Glendora, Grand Terrace, Hawaiian Gardens, Hawthorne, Hemet, Hermosa Beach, Hidden Hills, Highland, Huntington Beach, Huntington Park, Indian Wells, Indio, Industry, Inglewood, Irvine, Irwindale, Jurupa Valley, La Cañada Flintridge, La Habra, La Habra Heights, La Mirada, La Palma, La Puente, La Quinta, La Verne, Laguna Beach, Laguna Hills, Laguna Niguel, Laguna Woods, Lake Elsinore, Lake Forest, Lakewood, Lawndale, Loma Linda, Lomita, Long Beach, Los Alamitos, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Menifee, Mission Viejo, Monrovia, Montclair, Montebello, Monterey Park, Moreno Valley, Murrieta, Newport Beach, Norco, Norwalk, Ontario, Orange, Palm Desert, Palm Springs, Palos Verdes Estates, Paramount, Pasadena, Perris, Pico Rivera, Placentia, Pomona, Rancho Cucamonga, Rancho Mirage, Rancho Palos Verdes, Rancho Santa Margarita, Redlands, Redondo Beach, Rialto, Riverside, Rolling Hills, Rolling Hills Estates, Rosemead, San Bernardino, San Clemente, San Dimas, San Fernando, San Gabriel, San Jacinto, San Juan Capistrano, San Marino, Santa Ana, Santa Clarita, Santa Fe Springs, Santa Monica, Seal Beach, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Stanton, Temecula, Temple City, Torrance, Tustin, Upland, Vernon, Villa

Park, Walnut, West Covina, West Hollywood, Westlake Village, Westminster, Whittier, Wildomar, Yorba Linda, and Yucaipa.

Visits and/or communications were conducted with elected officials or staff from the following state and federal offices:

- U.S. Representative Grace Napolitano
- Assembly Member Jeff Miller

Staff represented AQMD and/or provided a presentation to the following groups:

American Jewish Committee, Los Angeles  
Anaheim Chamber of Commerce  
Carson Senior Center  
Carson Chamber of Commerce  
Coachella Valley Association of Governments, Palm Desert  
Corona Chamber of Commerce  
Culver City Chamber of Commerce  
Faithful Central Bible Church, Inglewood  
Five Mountain Communities Chamber of Commerce  
Industrial Environmental Coalition of Orange County  
League of California Cities, Orange County Division  
League of California Cities, Riverside County Division  
League of Women Voters, West San Gabriel Valley Division  
Loma Linda Chamber of Commerce  
Monterey Park Environmental Commission  
Orange County Business Council  
Orange County City Managers Association  
Orange County Council of Governments  
Pasadena Chamber of Commerce  
Pasadena Environmental Commission  
Pasadena Forward Organization  
Santa Monica Chamber of Commerce  
San Bernardino Associated Governments  
San Bernardino Chamber of Commerce  
San Gabriel Valley Council of Governments, Pasadena  
San Fernando Valley Green Team, Van Nuys  
South Bay Area Chambers of Commerce  
South Bay (M.A.P.S.) Marketing and Admission Professionals for Seniors  
South Coast Interfaith Council, Long Beach  
South Pasadena Chamber of Commerce  
St. Philomena Catholic Church, Carson  
Today's Fresh Start Charter School, Los Angeles



United Nations Association, Foothills Chapter  
US Green Building Council - Inland Empire Chapter, Redlands  
West Orange County Chambers of Commerce  
Westchester Senior Citizens Center  
Western Riverside Council of Governments, Riverside  
Wilmington Chamber of Commerce

\$53,000 below the five percent cap. Staffing and administrative expenditures are not directly drawn, however, from the MSRC fund account, but instead from the AQMD's budget. To cover these expenses, the MSRC approved a fund transfer (see Table 1 for further details).

Table 1. Estimated FY 2012-13 MSRC Miscellaneous and Direct Expenditures Proposed to be Allocated to AQMD Science and Technology Advancement FY 2012-13 Budget

	<b>Budget Code</b>	<b>Program Code</b>	<b>Estimated Expenditure</b>
Professional & Special Services	44003	67450	\$9,360
Public Notice	44003	67500	\$6,240
Communications	44003	67900	\$5,000
Postage	44003	68060	\$10,400
Office Expense/Supplies	44003	68100	\$15,600
Miscellaneous Expense	44003	69700	\$9,260
Conference- Related Expense	44003	69700	\$5,000
Travel Costs	44003	67800	\$2,500
<b>Total</b>			<b>\$63,360</b>

**Resource Impacts**

The 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 contracts specified herein, as well as any contracts awarded in response to the solicitations, will be drawn from this fund.

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BOARD MEETING DATE: September 7, 2012

AGENDA NO. 13

REPORT: Hearing Board Report

SYNOPSIS: This reports the actions taken by the Hearing Board during the period of June 1 through July 31, 2012.

COMMITTEE: Not Applicable

RECOMMENDED ACTION:

Receive and file this report.

Edward Camarena  
Chairman of Hearing Board

DP

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Three summaries are attached: **Rules From Which Variances and Orders for Abatement Were Requested in 2012** and **June 2012 and July 2012 Hearing Board Cases**.

The total number of appeals filed during the period June 1 to July 31, 2012 is 1; and total number of appeals filed during the period of January 1 to July 31, 2012 is 4.

















**Rules from which Variances and Order for Abatements were Requested in 2012**

	2012	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Action
1171														0
1171(c)														0
1171(c)(1)														0
1171(c)(1)(A)(i)														0
1171(c)(1)(b)(i)														0
1171(c)(4)														0
1171(c)(5)														0
1171(c)(5)(A)(i)														0
1171(c)(6)														0
1173														0
1173(c)														0
1173(d)														0
1173(e)(1)														0
1173(f)(1)														0
1173(g)														0
1175														0
1175(c)(2)														0
1175(c)(4)(B)														0
1175(c)(4)(B)(i)														0
1175(c)(4)(B)(ii)														0
1175(c)(4)(B)(ii)(I)														0
1175(b)(1) (C)														0
1175(d)(4)(ii)(II)														0
1176														0
1176(e)														0
1176(e)(1)														0
1176(e)(2)														0
1176(e)(2)(A)														0
1176(e)(2)(A)(ii)														0
1176(e)(2)(B)(v)														0
1178(d)(1)(A)(xiii)														0
1178(d)(1)(A)(xiv)														0
1178(d)(1)(B)														0
1176(f)(3)														0
1178(d)(1)(C)														0
1178(d)(3)(C)														0
1178(d)(3)(D)														0
1178(d)(3)(E)														0
1178(d)(4)(A)(i)														0
1178(g)														0
1186.1														0
1186.1														0
1189(c)(3)														0
1195														0
1195(d)(1)(D)														0
1303														0
1303(a)(1)														0









## Report of June 2012 Hearing Board Cases

Case Name and Case No.	Rules	Reason for Petition	District Position/ Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
1. Department of Commerce/NOAA/National Weather Service of San Diego Case #5882-1 (M. Reichert)	203(b)	Petitioner exceeded the operating hour limit for the emergency backup generator serving the critical weather radar and radio system.	Not Opposed/Granted	Ex Parte EV granted commencing 6/12/12 and continuing for 30 days or until the IV hearing currently scheduled for 6/19/12, whichever comes first.	NO <sub>x</sub> : To be reported at IV hearing on 6/19/12.
2. Department of Commerce/NOAA/National Weather Service of San Diego Case #5882-1 (M. Reichert)	203(b)	Petitioner exceeded the operating hour limit for the emergency backup generator serving the critical weather radar and radio system.	Not Opposed/Granted	IV granted commencing 6/19/12 and continuing for 90 days or until the RV hearing currently scheduled for 8/8/12, whichever comes first.	VOC: 12.3 lbs/day NO <sub>x</sub> : 12 lbs/day CO: 16.5 lb/day PM: .3 lb/day
3. Eastern Municipal Water District Case #4937-48A (N. Sanchez)	202(a) 1110.2(d)(i)(B)(ii)	Petitioner's NO <sub>x</sub> emission control system continues to operate with excess emissions.	Not Opposed/Granted	RV granted for 300 non- consecutive hours commencing 8/1/12 and continuing through 7/31/13, the FCD.	NO <sub>x</sub> : 54 lbs/day CO: 24 lbs/day
4. Eastern Municipal Water District Case #4937-51 (J. Panasiti)	202(a) 203(b)	New ICE/emergency generator requires more than the 4.2 hour/month limit to complete the commissioning and field testing.	Not Opposed/Denied	SV denied.	N/A
5. Exide Technologies Case #3151-27 (N. Sanchez)	203(b) 1420.1 2004(f)(1)	Petitioner exceeded the 30 day rolling average limit for lead emissions.	Opposed/Denied	Ex Parte EV denied.	N/A
6. Exide Technologies Case #3151-27 (N. Sanchez)	203(b) 1420.1 2004(f)(1) 3002(c)(1)	Petitioner exceeded the 30 day rolling average limit for lead emissions.	Opposed/Dismissed	EV dismissed without prejudice for the lack of good cause. A SV hearing is currently scheduled for 7/19/12.	N/A
7. ExxonMobil Oil Corporation Case #1183-467 (K. Manwaring)	203(b) 2004(f)(1) 3002(c)(1)	After an emergency shutdown, the SCR will intermittently exceed NO <sub>x</sub> limits until a stable correct operating temperature is attained.	Not Opposed/Granted	Ex Parte EV granted for 30 non-consecutive hours in a window-of-time commencing 6/27/12 and continuing through 7/4/12.	NO <sub>x</sub> : 105 lbs/total



<p>8. Linn Operating, Inc. Case #5711-8 (J. Voge)</p>	<p>203(b) 2004(f)(1) 3002(c)(1)</p>	<p>Petitioner operates a flare serving the oil producing field that exceeds the NO<sub>x</sub> and CO limits.</p>	<p>Not Opposed/Granted</p>	<p>RV granted commencing 6/12/12 and continuing through 4/15/13, the FCD.</p>	<p>Zeeco Flare in operation at 8.84 MMSCF without the micro turbines in operation: NO<sub>x</sub>: 9.34 lbs/day CO: 397.91 lbs/day</p> <p>Zeeco Flare and (5) micro turbines in operation at a total of 9.8 MMSCF: NO<sub>x</sub>: 10.7 lbs/day CO: 456.1 lbs/day</p> <p>Zeeco Flare and (5) micro turbines in operation at 11.55 MMSCF: NO<sub>x</sub>: 12.62 lbs/day CO: 537.52 lbs/day</p>
<p>9. SCAQMD vs. Calvary Chapel Center Case #5825-1 (N. Sanchez)</p>	<p>203(a)</p>	<p>Respondent operates a diesel ICE without a valid permit to operate.</p>	<p>Not stipulated/Issued</p>	<p>O/A issued commencing 6/16/12 and continuing through 1/15/13. The Hearing Board shall retain jurisdiction over this matter until 1/15/13.</p>	<p>N/A</p>
<p>10. SCAQMD vs. Carson Cogeneration Company Case #4324-4 (J. Voge)</p>	<p>2012(c)(2)(A) 2012(c)(2)(B) 2012(i) 2012, Appendix A, Protocol to Rule 2012, Chapter 2, paragraph B.5.a 2012, Appendix A, Chapter 2.B.5</p>	<p>The data acquisition system is not programmed to record the CEM NO<sub>x</sub> daily calibration check.</p>	<p>Stipulated/Issued</p>	<p>O/A issued commencing 6/14/12 and continuing through 9/14/12.</p>	<p>N/A</p>
<p>11. SCAQMD vs. Juan Alberto Sandoval, individually and dba TLC Body &amp; Paint Case #5881-1 (J. Voge)</p>	<p>109 203(a)</p>	<p>Respondent operates a paint spray booth without valid permit to operate.</p>	<p>Not Stipulated/Issued</p>	<p>O/A issued commencing 6/27/12 and continuing through 12/31/12. The Hearing Board shall retain jurisdiction over this matter until 12/31/12.</p>	<p>N/A</p>

12. SCAQMD vs. Sand Frog, LLC dba Western Blasting Case #5873-1 (M. Reichert)	203(a)	Respondent operates a diesel ICE serving abrasive blasting rooms without a valid permit to operate.	Stipulated/Issued	O/A Issued commencing 6/19/12 and continuing through 12/31/12. The Hearing Board shall retain jurisdiction over this matter until 12/31/12.	N/A
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**Acronyms**

AOC: Alternative Operating Conditions  
 BACT: Best Available Control Technology  
 CEMS: Continuous Emissions Monitoring System  
 CO: Carbon Monoxide  
 EV: Emergency Variance  
 FCD: Final Compliance Date  
 ICE: Internal Combustion Engine  
 IV: Interim Variance  
 MMSCF: Million Standard Cubic Feet  
 NO<sub>x</sub>: Oxides of Nitrogen  
 N/A: Not Applicable  
 O/A: Order for Abatement  
 PM: Particulate Matter  
 RV: Regular Variance  
 SCR: Selective Catalytic Reduction  
 SV: Short Variance  
 VOC: Volatile Organic Compound

## Report of July 2012 Hearing Board Cases

Case Name and Case No.	Rules	Reason for Petition	District Position/ Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
1. Exide Technologies Case #3151-27 (N. Sanchez)	203(b) 1420.1(g)(4) 2004(f)(1) 3002(c)(1)	Petitioner needs additional time to submit additional lead emission control measures per its compliance plan.	Not Opposed/Granted	SV granted commencing 7/19/12 and continuing through 8/18/12.	None
2. ExxonMobil Oil Corporation Case #1183-468 (J. Voge)	203(b) 2004(f)(1) 3002(c)(1)	Petitioner will exceed NOx limit while SCR comes up to proper operating temperature upon restart of heater serving refinery operations.	Not Opposed/Granted	Ex Parte EV granted for 72 non-consecutive hours in a window of time commencing 7/11/12 and continuing through 7/15/12.	NOX: 9 lbs/hr.
3. Rexam Beverage Can Co. Case #5290-8 (J. Voge)	203(b) 1125(d)(1) 2004(f)(1) 3002	Petitioner seeks to continue production while air pollution control equipment is down for repair.	Not Opposed/Granted	Ex Parte EV granted commencing 7/6/12 and continuing for 30 days or until the EV hearing currently scheduled for 7/12/12, whichever comes first.	VOC: TBD by 7/25/12
4. SCAQMD vs. Browning-Ferris Industries of California, Inc., and Republic Services, Inc. dba Sunshine Canyon Landfill Case #3448-13 (Consent Calendar; No Appearance)	402 1150.1(d)(12) H&S Code §41700	Respondent cannot complete installation of new flare by due date and must operate temporary flare instead.	Stipulated/Issued	Mod. O/A issued commencing 7/11/12; the Hearing Board shall retain jurisdiction over this matter until 12/31/13.	N/A
5. SCAQMD vs. California Hospital Medical Center Case #5826-1 (Consent Calendar; No Appearance)	1146(c)(2)(A)	Respondent operating noncompliant boilers.	Stipulated/Issued	Mod. O/A issued commencing 7/18/12; the Hearing Board shall retain jurisdiction over this matter until 7/18/13.	N/A
6. SCAQMD vs. Inland Empire Utilities Agency and Environ Strategy Consultants, Inc. Case #5209-4 (K. Manwaring)	203(b) 3002(c)(1)	Required source tests cannot be done because full capacity and stabilization of digester has not been achieved.	Stipulated/Issued	Mod. O/A issued commencing 7/18/12; the Hearing Board shall retain jurisdiction over this matter until 12/31/13.	N/A

7. SGL Technic, Inc. Polycarbon Division Case #3923-8 (M. Reichert)	203(b) 2004(f)(1)	Critical component (98% nitric acid) for production of primary feedstock material became unavailable. Petitioner seeks to use unpermitted process to meet customer demand for product.	Not Opposed/Granted	RV granted commencing 7/18/12 and continuing through 12/31/12, the FCD.	None
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### Acronyms

AOC: Alternative Operating Conditions  
 CO: Carbon Monoxide  
 ESP: Electrostatic Precipitator  
 EV: Emergency Variance  
 FCD: Final Compliance Date  
 GDF: Gasoline Dispensing Facility  
 H&S: Health & Safety Code  
 H2S: Hydrogen Sulfide  
 ICE: Internal Combustion Engine  
 I/P: Increments of Progress  
 IV: Interim Variance  
 MFCD/EXT: Modification of a Final Compliance Date and Extension of a Variance  
 Mod. O/A: Modification of an Order for Abatement  
 NH3: Ammonia  
 NOx: Oxides of Nitrogen  
 O/A: Order for Abatement  
 PM: Particulate Matter  
 ROG: Reactive Organic Gas  
 RV: Regular Variance  
 SCR: Selective Catalytic Reduction  
 SO2: Sulfur Dioxide  
 SOx: Oxides of Sulfur  
 SV: Short Variance  
 TBD: To be determined  
 VOC: Volatile Organic Compounds  
 VRS: Vapor Recovery System

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 14

REPORT: Civil Filings and Civil Penalties Report

SYNOPSIS: This reports the monthly penalties from June 1 through June 30, 2012, and legal actions filed by the District Prosecutor during June 1 through June 30, 2012. An Index of District Rules is attached with the penalty report.

COMMITTEE: Stationary Source, July 27, 2012, Reviewed

RECOMMENDED ACTION:  
Receive and file this report.

Kurt R. Wiese  
General Counsel

KRW:lc

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Violations

Civil Actions Filed

- |   |   |
|---|---|
| 2 | AAA GASOLINE<br>Los Angeles Superior Court – Central<br>Court Case No. 12K08772; Filed: 6.11.12 (NAS)<br>P54630, P54636<br>R. 461 – Gasoline Transfer and Dispensing                                    |
| 3 | JAFAR RASHID dba VALERO THREE FOUR INC.<br>Los Angeles Superior Court – Central<br>Court Case No. 12K09219; Filed: 6.25.12 (NAS)<br>P56763, P56765, P56777<br>R. 461 – Gasoline Transfer and Dispensing |

1      99 CENTS ONLY STORE  
Los Angeles Superior Court – Central  
Court Case No. BC486474; Filed: 6.14.12 (TRB)  
P55263  
Rule 2202    On-Road Motor Vehicle Mitigation Options

5 Violations

3 Cases

**ATTACHMENTS**

June 2012 Penalty Report

Index of District Rules and Regulations

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
District Prosecutor's Office**

**June 2012 Penalty Report**

**Total Penalties**

<b>Civil Penalties:</b>	<b>\$917,308.00</b>
<b>MSPAP Penalties:</b>	<b>\$59,215.00</b>
<b>Hearing Board Penalties:</b>	<b>\$54,500.00</b>
<b>SRV Penalties:</b>	<b>\$250,000.00</b>
<b>Total Cash Penalties:</b>	<b>\$1,281,023.00</b>
<b>Total SEP Value:</b>	<b>\$0.00</b>
<b>Fiscal Year through June 2012 Cash Total:</b>	<b>\$5,822,332.31</b>
<b>Fiscal Year through June 2012 SEP Value Only Total:</b>	<b>\$216,953.00</b>

FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO	TOTAL SETTLEMENT
<b><u>CIVIL PENALTIES:</u></b>							
12362	ACCESS BUSINESS GROUP LLC, NUTRILITE	3002		6/19/2012	KCM	P57542	\$2,700.00
800052	ARCO TERMINAL SERVICES CORP., TERMINAL	463, 1173, 1149, 3002		6/20/2012	JMP	P57716	\$10,000.00
131003	BP WEST COAST PROD.LLC BP CARSON REFINERY	1118, 1176, 3002 463, 1118, 1173, 3002 1173 3002 1118, 3002 1173, 1176 3002 2012 1173 1158, 1173, 1178 1173, 1178	Y	6/20/2012	JMP	P57705 P39649 P57707 P57708 P57714 P57717 P57718 P57719 P57720 P57721 P57722	\$296,500.00
129123	CLASSIC OIL INC	461(C)(2)(B) 461(C)(2)(A) 41960.2		6/8/2012	NAS	P35774 P54013	\$1,000.00
83519	CRENSHAW CHRISTIAN CENTER	203 (A), 1470		6/21/2012	KCM	P58802	\$5,500.00
124805	EXIDE TECHNOLOGIES	221(B), 1407, 1420		6/19/2012	NSF	P33574	\$95,000.00



124838	EXIDE TECHNOLOGIES	42401 42401 1420 42401 201, 203, 221(B) 2004 201 42401	Y	6/19/2012	NSF	P49876 P49877 P49883 P49878 P49883 P55520 P49871 P49875	\$119,000.00
141740	GORMAN UNION 76,SALPY SARAH TERLSIAN	461, 461 (E) (2)		6/19/2012	NAS	P56856 P52245	\$3,000.00
157205	GUZMAN ENERGY	203 (A)		6/1/2012	TRB	P49532	\$20,000.00
150319	LYON'S OIL	461 203 (B), 41960.2 461(C)(2)(B)		6/19/2012	JGV	P56496 P52228	\$6,000.00
117297	MM PRIMA DESHECHA ENERGY, LLC	203(B), 1110.2, 1150.1		6/13/2012	KCM	P53003	\$6,000.00
61722	RICOH ELECTRONICS INC	2012 2004	Y	6/12/2012	JGV	P51885 P51886	\$908.00
139490	RUSTOLEUM CORP Cash: \$300,000; Suspended Penalty: If within 1 year (expires 5/24/2013) violates any District rule on architectural coatings, Rustoleum shall pay \$75,000.	1113(C)(2) 1113(C)(2)		6/1/2012	NAS	P55132 P55135	\$300,000.00

149814 SIERRACIN/SYLMAR CORP	109, 3002(C)(1)	6/27/2012	TRB	P57453	\$1,700.00
170855 WALMART	1113(C)(2)	6/1/2012	JMP	P50620	\$47,500.00
155393 WEST HILLS 76	203(B), 461(C)(2)(B) 461, 41960.2 461	6/12/2012	NAS	P57001 P56468 P56472	\$2,500.00

**TOTAL CIVIL PENALTIES: \$917,308.00**

**SELF-REPORTED VIOLATION:**

800089 EXXONMOBIL OIL CORPORATION Penalty payment in lieu of completing a project required under the 10/31/02 settlement agreement regarding Rule 2009.1. This will prevent the need to re-open the 2002 agreement and cover alleged violations and failure to maintain the flare monitoring system for the Torrance refinery flares required under Rule 1118.	1118	Y	6/26/2012	JMP SRV87	\$250,000.00
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**TOTAL SRV SETTLEMENTS: \$250,000.00**

**MSPAP SETTLEMENTS:**

169250 A TO Z SERVICE STATION INC.	41960.2 461(C)(2)(B)	6/26/2012		P59046	\$1,030.00
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160676 ARCO FAC #09588 SHAAN PAAL HOLDING C	461(C)(2)(B) 41960.2		6/19/2012	P59015	\$500.00
170462 BARKER CONSTRUCTIN & DEVELOPMENT COM	1403		6/8/2012	P53075	\$1,375.00
146983 BENZENE POWER INC/PACOIMA PREN	41960.2 461(C)(2)(B)		6/12/2012	P59228	\$370.00
800344 CALIFORNIA AIR NATIONAL GUARD, MARCH IFB	2004	Y	6/28/2012	P51889	\$1,375.00
162293 CALTRANS DIST 8	203 (A), 222		6/26/2012	P58965	\$3,300.00
130782 CANOGA AMPM	461(C)(2)(B) 41960.2		6/7/2012	P59210	\$420.00
169363 CBRE	203 (A)		6/28/2012	P58861	\$1,000.00
142705 CLOCK TOWER/SECO CLEANERS	1421		6/12/2012	P56078	\$355.00
127861 EXPERIAN INFORMATION SOLUTIONS INC	1415, 1146.1 203 (B)		6/7/2012	P58856	\$2,600.00
105332 EXXONMOBIL DLR, M. JADALI,#17748,#18	203 (B), 41960.2 461(C)(2)(B)		6/22/2012	P58141	\$690.00

69518	FERRELLGAS INC	203 (A)	6/19/2012	P52345	\$1,920.00
136696	FIRESTONE SHELL, MAROON BOUTROS DBA	461, 41960.2	6/27/2012	P56790	\$750.00
169857	FOOTHILL TECHNOLOGY CENTER LLC	203 (A)	6/22/2012	P57671	\$1,345.00
169857	FOOTHILL TECHNOLOGY CENTER LLC	203 (A)	6/22/2012	P57672	\$1,345.00
67776	FUEL CONTROLS INC	203 (B) 461 (E) (2)	6/7/2012	P54743	\$1,275.00
169822	GREEN SEASON TREE SERVICE, INC	203(A)	6/7/2012	P49292	\$400.00
86252	GROVE LUMBER	461	6/7/2012	P52348	\$1,760.00
149944	KADIMA HEBREW ACADEMY	1146.2	6/7/2012	P53937	\$850.00
72772	LA UNIFIED DIST, FRIEDMAN OCCUPATION	203 (B)	6/27/2012	P58819	\$1,500.00
59725	LOS AMIGOS COUNTRY CLUB	461 (E) (2) 203 (B)	6/12/2012	P58402	\$1,000.00
148835	M & J UNION 76, RAFAAT R LUGA	461	6/5/2012	P57790	\$780.00

154188 MAIN STREET VALERO	461, 41960.2	6/1/2012	P56784	\$350.00
141429 MP GAS, INC/ PETRO EAGLE	41960.2 41954 461(C)(2)(B)	6/22/2012	P59227	\$750.00
168258 NORTHGATE #33 LOS ANGELES	203 (A)	6/7/2012	P58824	\$550.00
156658 O.M.S.R. INVESTMENT LLC	461	6/7/2012	P59855	\$1,250.00
142775 OCEANGATE PETROLEUM, INC	461, 41960.2	6/19/2012	P58515	\$700.00
168868 OM PETROLEUM	203 (B), 461	6/27/2012	P59207	\$375.00
113329 ONE HUNDRED TOWERS LLC, CENTURY PLAZA	203(B), 1146, 1470	6/22/2012	P58170	\$5,400.00
124388 PALM DESERT RESORT COUNTRY CLUB	461	6/1/2012	P58329	\$500.00
117764 PALM SPRINGS UNIFIED SCHOOL DISTRICT	203, 1470	6/28/2012	P58315	\$500.00
131573 PETER FRIO & SON CHEVRON	461, 41960.2	6/7/2012	P58528	\$1,210.00

21928	PICO WATER DIST	461 (E) (2) 461(E)(5)	6/21/2012	P59600	\$450.00
34189	REDLANDS FOOTHILL GROVES	461, 1146.2	6/12/2012	P58967	\$1,800.00
168045	RICHMOND AMERICAN HOMES/MT. VIEW PRO	403	6/21/2012	P57457	\$1,100.00
168045	RICHMOND AMERICAN HOMES/MT. VIEW PRO	403(D)(1)	6/21/2012	P56969	\$1,200.00
73016	RIV CO., PINE COVE FIRE STATION	203 (B)	6/19/2012	P57541	\$375.00
141443	RODRIGUEZ SANDBLASTING	203 (A), 203(B)	6/1/2012	P56943	\$350.00
161712	SAME DAY CLEANERS	203(A), 203(B), 1102	6/26/2012	P53298	\$1,100.00
145444	SEARS GRAND FOOTHILL CROSSING	203 (A)	6/8/2012	P52347	\$600.00
60200	SEVAN GAS STATION/DANIEL'S AUTOMOTIVE	461	6/28/2012	P59017	\$180.00
169542	SHARMA OIL, INC DBA PRIYANKA'S CHEVRON	461, 41960.2	6/5/2012	P56692	\$265.00
117019	SHERMAN CAR, INC	41960.2 461(C)(1)(A)	6/1/2012	P59101	\$900.00

168119	SHUTTERS TO GO	109, 201, 203(A)	6/26/2012	P46727	\$550.00
165091	SLAUSON SHELL MAROUN BOUTROS	461	6/19/2012	P56780	\$550.00
159406	SOMERCLARK GAS	41960.2 461(C)(2)(B)	6/8/2012	P58636	\$550.00
169441	STAR CLEANERS, TERESA ALVAREZ	203(A)	6/26/2012	P54099	\$400.00
118056	STRONG INC	41960.2 461(C)(3)(A)	6/27/2012	P59025	\$450.00
100490	SUNSET SIERRA PROPERTY, C/O THE VOIT	203(B), 1470	6/1/2012	P57938	\$825.00
100489	SUNSET SIERRA PROPERTY, C/O THE VOIT	203(B), 1470	6/1/2012	P57937	\$825.00
140012	SUPER CLEANERS	1421	6/1/2012	P58670	\$300.00
142829	TAWWAKAL CORPORATION	41960.2 461(C)(1)(A) 461(C)(2)(B)	6/26/2012	P58648	\$550.00

152001 TESORO S.COAST, S.KIM, MARGUERIT, #6	203 (B) 41960.2 461(C)(1)(A)	6/7/2012	P58147	\$550.00
162890 THE MANHATTAN 76	203 (B), 461	6/26/2012	P58520	\$660.00
169839 TTSI	403(D)(1)	6/27/2012	P53596	\$1,400.00
167407 U S HENDY OIL INC.	41960.2 461(C)(2)(B)	6/8/2012	P59110	\$550.00
127286 VONS FUEL CENTER #1625	461	6/28/2012	P59106	\$360.00
150826 VONSA SAFEWAY CO, VONS FUEL CTR #28	203 (B) 461(C)(1)(A)	6/8/2012	P58379	\$3,300.00
148839 WINCHESTER CLEANERS, KWANG HWAN LEE	1102	6/26/2012	P58037	\$550.00
161429 WINTHROP MANAGEMENT, LP/LINWOOD AVE	203 (B)	6/27/2012	P59700	\$450.00
33506 WORLD OIL CO #43	41960.2 461(C)(1)(A)	6/26/2012	P59105	\$550.00

**TOTAL MSPAP SETTLEMENTS: \$59,215.00**



**HEARING BOARD SETTLEMENTS:**

114017	BOSE & AVINDER, INC, KANGAROO FOOD MART Hearing Board Case No. 5837-1 Failure to install ISD at facility.	461	461	6/19/2012	NAS	HRB2060	\$1,000.00
158308	DEL REAL FOODS, LLC Beginning July 2010, payments of \$5,000/month of non-compliance, defined as the regenerative thermal oxidizer not meeting BACT. Period covers August 2011 thru May 2012.	203, 1303		6/26/2012	NAS	HRB2061	\$50,000.00
157919	F & M BAINS, INC., RAJINDER SINGH Hearing Board Case No. 5870-1 Facility shall pay \$500/month for transfer gasoline from its gasoline dispensing facility not equipped with a Phase II VRS that has been certified to be ORVR. Penalty covers May 2012.	461		6/5/2012	NAS	HRB2055	\$500.00
157919	F & M BAINS, INC., RAJINDER SINGH Hearing Board Case No. 5870-1 Facility shall pay \$500/month for transfer gasoline from its gasoline dispensing facility not equipped with a Phase II VRS that has been certified to be ORVR. Penalty covers June 2012.	461		6/1/2012	NAS	HRB2062	\$500.00
50234	TORRANCE CITY/CITY SERVICES FACILITY Hearing Board Case No. 5752-2 Beginning 6/1/12, Torrance shall pay \$500/month it transfers gas from its GDF not equipped with a Phase II VRS. Penalty	461		6/8/2012	NAS	HRB2056	\$500.00

period covers May 2012.

165209	WESTCOAST PLATING, INC. Hearing Board Case No. 5840-1 \$1,000/month stipulated penalty until permits obtained for plating line.	201, 203	6/12/2012	JMP	HRB2057	\$1,000.00
138499	WHITE OAK 76, ANTONE E NINO DBA Hearing Board Case No. 5834-1 Failure to install and successfully test ISD by 3/1/11.	461	6/12/2012	NAS	HRB2058	\$1,000.00

**TOTAL HEARING BOARD SETTLEMENTS: \$54,500.00**

**Total Penalties**

<b>Civil Penalties:</b>	<b>\$917,308.00</b>
<b>MSPAP Penalties:</b>	<b>\$59,215.00</b>
<b>Hearing Board Penalties:</b>	<b>\$54,500.00</b>
<b>SRV Penalties:</b>	<b>\$250,000.00</b>
<b>Total Cash Penalties:</b>	<b>\$1,281,023.00</b>
<b>Total SEP Value:</b>	<b>\$0.00</b>
<b>Fiscal Year through June 2012 Cash Total:</b>	<b>\$5,822,332.31</b>
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## DISTRICT RULES AND REGULATIONS INDEX FOR JUNE 2012 PENALTY REPORTS

### REGULATION I - GENERAL PROVISIONS

Rule 109 Recordkeeping for Volatile Organic Compound Emissions (*Amended 5/2/03*)

### REGULATION II – PERMITS

List and Criteria Identifying Information Required of Applicants Seeking A Permit to Construct from the South Coast Air Quality Management - District (*Amended 4/10/98*)

Rule 201 Permit to Construct (*Amended 12/3/04*)

Rule 203 Permit to Operate (*Amended 12/3/04*)

Rule 221 Plans (*Adopted 1/4/85*)

Rule 222 Filing Requirements for Specific Emission Sources Not Requiring a Written permit Pursuant to Regulation II. (*Amended 5/19/00*)

### REGULATION IV - PROHIBITIONS

Rule 403 Fugitive Dust (*Amended 12/11/98*) *Pertains to solid particulate matter emitted from man-made activities.*

Rule 461 Gasoline Transfer and Dispensing (*Amended 6/15/01*)

### REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1102 Petroleum Solvent Dry Cleaners

Rule 1113 Architectural Coatings (*Amended 6/20/01*)

Rule 1118 Emissions From Refinery Flares (*Adopted 2/13/98*)

Rule 1146 Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters (*Amended Rule*)

Rule 1149 Storage Tank Degassing (*Amended 7/14/95*)

Rule 1150.1 Control of Gaseous Emissions from Active Landfills (*Amended 3/17/00*) Rule 1168 Adhesive and Sealant Applications (*Amended 9/15/00*)

Rule 1158 Storage, Handling and Transport of Petroleum Coke (*Amended 6/11/99*)

Rule 1173 Fugitive Emissions of Volatile Organic Compounds (*Amended 5/13/94*)

Rule 1176 Sumps and Wastewater Separators (*Amended 9/13/96*)

Rule 1178 Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (*Amended 4/7/06*)

## **REGULATION XIII - NEW SOURCE REVIEW**

Rule 1303 Requirements (*Amended 4/20/01*)

## **REGULATION XIV - TOXICS**

Rule 1403 Asbestos Emissions from Demolition/Renovation Activities (*Amended 4/8/94*)

Rule 1407 Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Ferrous Metal Melting Operations (*Adopted 7/8/94*)

Rule 1415 Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems (*Amended 10/14/94*)

Rule 1420 Emissions Standard for Lead (*Adopted 9/11/92*)

Rule 1421 Control of Perchloroethylene Emissions from Dry Cleaning Operations (*Amended 6/13/97*)

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 (*Amended 4/6/07*)

Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO<sub>x</sub>) Emissions (*Amended 5/6/05*)

## **REGULATION XXX - TITLE V PERMITS**

Rule 3002 Requirements (*Amended 11/14/97*)

## **CALIFORNIA HEALTH AND SAFETY CODE § 41700**

41954 Compliance for Control of Gasoline Vapor Emissions

41960 Gasoline Vapor Recovery

42401 Violation of Order for Abatement

## **CALIFORNIA CODE OF REGULATIONS**

Title 13 Mobile Sources and Fuels



BOARD MEETING DATE: September 7, 2012

AGENDA NO. 15

REPORT: Lead Agency Projects and Environmental Documents Received by the AQMD

SYNOPSIS: This report provides, for the Board's consideration, a listing of CEQA documents received by the AQMD between June 1, 2012, and July 31, 2012, and those projects for which the AQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: No Committee Meeting Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

EC:LT:SN:SS:IM:AK

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## Background

**CEQA Document Receipt and Review Logs (Attachments A and B)** – Each month, the AQMD receives numerous CEQA documents from other public agencies on projects that could adversely affect air quality. Because no Board Public Hearing was held in August, the listing of CEQA documents that would have been reported at the Public Hearing, June 1, 2012, through June 30, 2012 are also included in this agenda as Attachment A-1. Attachment B-1 lists active projects from previous reporting periods. A listing of all documents received during the reporting period of July 1, 2012, through July 31, 2012, is contained in Attachment A-2. A list of active projects from previous reporting periods for which AQMD staff is continuing to evaluate or prepare comments is included as Attachment B-2.

The Intergovernmental Review function, which consists of reviewing and commenting on the adequacy of the air quality analysis in CEQA documents prepared by other lead agencies, is consistent with the Board's 1997 Environmental Justice Guiding Principles and Initiative #4. Consistent with the Environmental Justice Program Enhancements for

FY 2002-03 approved by the Board in September 2002, each of the attachments notes those proposed projects where the AQMD has been contacted regarding potential air quality-related environmental justice concerns. The AQMD has established an internal central contact to receive information on projects with potential air quality-related environmental justice concerns. The public may contact the AQMD about projects of concern by the following means: in writing via fax, e-mail, or standard letters; through telephone communication; as part of oral comments at AQMD meetings or other meetings where AQMD staff is present; or submitting newspaper articles. The attachments also identify for each project the dates of the public comment period and the public hearing date, if known at the time the CEQA document is received by the AQMD.

At the January 6, 2006 Board meeting, the Board approved the Workplan for the Chairman's Clean Port Initiatives. One action item of the Chairman's Initiatives 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 response to describing goods movement CEQA documents, Attachments A and B were reorganized to group projects of interest into the following categories: goods movement projects; schools; landfills and wastewater projects; airports; and general land use projects; etc. In response to the mitigation component, guidance information on mitigation measures were compiled into a series of tables relative to the following equipment: off-road engines, on-road engines, harbor craft, ocean-going vessels, locomotives, and fugitive dust. These mitigation measure tables are on the CEQA webpages portion of the AQMD's website. Staff will continue compiling tables of mitigation measures for other emission sources including airport ground support equipment, etc.

As resources permit, staff focuses on reviewing and preparing comments for projects: where the AQMD is a responsible agency; that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement, etc.); that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); where environmental justice concerns have been raised; and those projects for which a lead or responsible agency has specifically requested AQMD review.

During the period June 1, 2012, through July 31, 2012, the AQMD received 110 CEQA documents. Of the total of 151 documents listed in Attachments A and B:

- 35 comment letters were sent;
- 44 documents were reviewed, but no comments were made;
- 57 documents are currently under review;
- 15 documents did not require comments (e.g., public notices, plot plans, Final Environmental Impact Reports); and
- 0 documents were not reviewed.

Copies of all comment letters sent to lead agencies can be found on the AQMD's CEQA webpage at the following internet address: [www.aqmd.gov/ceqa/letters.html](http://www.aqmd.gov/ceqa/letters.html).

**AQMD Lead Agency Projects (Attachment C)** – Pursuant to CEQA, the AQMD periodically acts as lead agency for stationary source permit projects. Under CEQA, the lead agency is responsible for determining whether an Environmental Impact Report (EIR) or a Negative Declaration (ND) is appropriate for any proposal considered to be a “project” as defined by CEQA. An EIR is prepared when the AQMD, as lead agency, finds substantial evidence that the proposed project may have significant adverse effects on the environment. A ND or Mitigated Negative Declaration (MND) may be prepared if the AQMD determines that the proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are written statements describing the reasons why proposed projects will not have a significant adverse effect on the environment and, therefore, do not require the preparation of an EIR.

Attachment C to this report summarizes the active projects for which the AQMD is lead agency and is currently preparing or has prepared environmental documentation. Through the end of July, the AQMD received no new requests to be the lead agency for a stationary source permit application project. No CEQA documents for permit application projects were certified in July. As noted in Attachment C, through the end of July 2012, the AQMD continued working on the CEQA documents for six active projects.

In 2012, AQMD staff has been responsible for preparing or having prepared CEQA documents for eight CEQA documents, five continuing from 2011. One project was withdrawn by the project proponent in January. Through the end of July 2012, one CEQA document has been certified for a permit application project.

#### **Attachments**

- A. Incoming CEQA Documents Log
- B. Ongoing Active Projects for Which AQMD Has or Will Conduct a CEQA Review
- C. Active AQMD Lead Agency Projects





**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2012 TO JUNE 30, 2012**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>General Land Use (residential, etc.)</i> <u>ORC120619-02</u> Demolish Historic Property No. 2012-01	This document consists of a notice of public hearing for the a decision-making process for the possible demolition of the Sexlinger Farmhouse, Historic Property No. 2012-01.  Comment Period: N/A Public Hearing: 6/28/2012	Other	City of Santa Ana	Document does not require comments
<i>General Land Use (residential, etc.)</i> <u>ORC120629-02</u> Cielo Vista Project	The proposed project consists of a maximum of 112 single-family dwellings and associated infrastructure within two Planning Areas.  Comment Period: 6/29/2012 - 7/19/2012 Public Hearing: N/A	NOP (No IS attached)	County of Orange	Currently under review
<i>General Land Use (residential, etc.)</i> <u>RVC120605-02</u> Reclamation Plan Amendment for Pacific Clay/Brighton Alberhill Mine	The proposed project consists of an amendment to previously adopted Reclamation Plan (RP) 90-1. The project area comprised approximately 400 acres in an undeveloped and rural area. The Amendment RP 90-1 includes 90.5 acres of total reclaimed area, 57.4 acres of which were past mining areas, and 33.1 acres which contain previously constructed storm drain detention ponds and associated roads previously authorized by the Regional Water Quality Control Board.  Comment Period: 5/31/2012 - 7/2/2012 Public Hearing: N/A	Mitigated ND	City of Lake Elsinore	Document reviewed - No comments Sent
<i>General Land Use (residential, etc.)</i> <u>RVC120605-03</u> Change of Zone No. 7780 and Tentative Tract Map No. 36430	This document consists of an initial case transmittal for the change of zone to define the boundary's of Specific Plan No. 260 Planning Areas 34, 36, 38, 39 and 40 and tentative tract map that proposes to divide 180 acres into 392 residential lots, 1 park, 1 school site, and community trail.  Comment Period: 6/5/2012 - 6/21/2012 Public Hearing: N/A	Other	County of Riverside	Document does not require comments
<i>General Land Use (residential, etc.)</i> <u>RVC120615-03</u> TTM 36343, GP 10-10-0010, ZC 10-10-0011	This document consists of a notice of public hearing and intent to adopt a mitigated negative declaration. The proposed project consists of amending the General Plan and Zoning designation of Tentative Tract Map 31926, along with a Text Amendment to reduce the minimum lot frontage from 50-feet to 45-feet to facilitate the amendment of the tract map from 135 lots of 187 lots.  Comment Period: 7/20/2012 - 7/11/2012 Public Hearing: 7/18/2012	Other	City of Perris	Document reviewed - No comments Sent

DEIR - Draft Environmental Impact Report  
FEIR - Final Environmental Impact Report  
RDEIR - Revised Draft Environmental Impact Report  
SEIR - Subsequent Environmental Impact Report  
SupEIR – Supplemental EIR

NOI - Notice of Intent to prepare an EIS  
NOP - Notice of Preparation  
IS - Initial Study  
DEA - Draft Environmental Assessment  
EIS - Environmental Impact Statement

FONSI - Finding of No Significant Impact  
ND - Negative Declaration  
Other - Typically notices of public meetings  
N/A - Not Applicable

# - Project has potential environmental justice concerns due to the nature and/or location of the project.









**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2012 TO JUNE 30, 2012**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Retail</b> <u>RVC120621-03</u> Fast Track General Plan Amendment No. 1109/ Change of Zone No. 7784/ Tentative Parcel Map No. 36443/ Plot Plan No. 15946, Revised Permit No. 1 (FTA-2010-11)	This document consists of an initial case transmittal for the Fast Track General Plan Amendment No. 1109, Change of Zone No. 7784, Tentative Parcel Map No. 36443, Plot Plan No. 15946, and Revised Permit No. 1. The proposed Plot Plan consists of expanding the Cabazon Outlet II stores by constructing an approximately 79,000 square-foot commercial retail center addition.  Comment Period: 6/21/2012 - 7/12/2012 Public Hearing: N/A	Other	Riverside County	Document does not require comments
<b>Retail</b> <u>SBC120622-01</u> College Park Retail Zone Change 12-01	The proposed project consists of a request for a zone change from Light Industrial to Highway Commercial for an approximately 2.74 acre vacant parcel on the southeast corner of Arrow Route and Monte Vista Avenue.  Comment Period: 6/21/2012 - 7/10/2012 Public Hearing: 7/25/2012	ND	City of Upland	Document reviewed - No comments Sent
<b>Transportation</b> <u>LAC120613-01</u> Interstate 110/C Street Interchange project	This document consists of response to SCAQMD Comments. The proposed project consists of a northbound off-ramp for direct access to Harry Bridges Boulevard, modification for the northbound on-ramp from C Street, realignment of Harry Bridges Boulevard, and combining the I-110 ramp terminal/C Street/Figueroa Street intersection with John S. Gibson Boulevard/Harry Bridges Boulevard Intersection.  Comment Period: N/A Public Hearing: N/A	Other	California Department of Transportation	Document reviewed - No comments Sent
<b>Transportation</b> <u>LAC120626-01</u> I-710 Corridor Project	The proposed project consists of improving the I-710 in Los Angeles County between Ocean Blvd. and State Route 60.  Comment Period: 6/26/2012 - 8/29/2012 Public Hearing: N/A	DEIR	California Department of Transportation	Currently under review
<b>Transportation</b> <u>LAC120628-01</u> Expo Light Rail Line	This document consists of a Phase 2 Update Meeting for the Expo Light Rail Line.  Comment Period: N/A Public Hearing: 7/10/2012	Others	The Exposition Construction Authority	Document does not require comments

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Other - Typically notices of public meetings  
N/A - Not Applicable  
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**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2012 TO JUNE 30, 2012**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <u>SBC120620-01</u> Cucamonga Valley Water District	The proposed project consists of the Lloyd W. Michaels Water Treatment Plant regulatory compliance upgrades to a 60 million gallon conventional treatment facility currently treating State Water Project water supplied by Metropolitan Water District of southern California via the Rialto Pipeline. The improvements are necessary to meet current and pending drinking water quality regulations.  Comment Period: 6/18/2012 - 7/17/2012 Public Hearing: N/A	Mitigated ND	Cucamonga Valley Water District	Currently under review
<b>TOTAL DOCUMENTS RECEIVED THIS REPORTING PERIOD: 47</b>				

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**ATTACHMENT B-1  
ONGOING ACTIVE PROJECTS FOR WHICH AQMD HAS  
OR WILL CONDUCT A CEQA  
REVIEW**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <u>LAC120511-07</u> East Los Angeles Recycling and Transfer Station	This document consists of an air quality impact analysis and air toxics risk assessment for the proposed transfer station project. The project includes increasing the waste throughput to 1,500 tons per day of waste.  Comment Period: N/A  Public Hearing: N/A	Other	County of Los Angeles	AQMD commented 6/1/2012

<p><b>TOTAL NUMBER OF REQUESTS TO AQMD FOR DOCUMENT REVIEW THIS REPORTING PERIOD: 47</b>  <b>TOTAL NUMBER OF COMMENT LETTERS SENT OUT THIS REPORTING PERIOD: 11</b>  <b>TOTAL NUMBER OF DOCUMENTS REVIEWED, BUT NO COMMENTS WERE SENT: 18</b>  <b>TOTAL NUMBER OF DOCUMENTS CURRENTLY UNDER REVIEW: 32</b>  <b>TOTAL NUMBER OF DOCUMENTS THAT DID NOT REQUIRE COMMENTS: 8</b>  <b>TOTAL NUMBER OF DOCUMENTS THAT WERE NOT REVIEWED: 0</b></p>
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**ATTACHMENT C-1**  
**ACTIVE AQMD LEAD AGENCY PROJECTS**  
**THROUGH JUNE 30, 2012**

Project Description	Project	Type of	Status	Consultant
Shell Carson Terminal operators are proposing a permit modification to base throughput on ethanol and gasoline, not just ethanol.	Shell Carson Distribution Terminal	EIR	Public comment period for Notice of Preparation/Initial Study closed May 18, 2010. Consultant is revising administrative Draft EIR.	AECOM
Petro Diamond operators are proposing to change current permit conditions to allow an increase in the number of annual marine vessel visits to the terminal, but limit ship visits per month.	Petro Diamond Terminal Company	Not Yet Determined	Consultant preparing Initial Study	SABS Environmental Services
Operators of the Ultramar Wilmington Refinery are proposing to construct and install a 49 MW cogeneration unit to reduce the Refinery's reliance on electricity from the Los Angeles Department of Water and Power and produce steam to meet internal needs. No other refinery modifications are proposed.	Ultramar Wilmington Refinery	EIR	Notice of Preparation/Initial Study circulated for a 30-day public comment period on April 3, 2012. Comment Period ended May 3, 2012. Consultant preparing administrative Draft EIR.	Environmental Audit, Inc.
The operators of the Chevron Products El Segundo Refinery are proposing to remove six old coke "drums" and replace them with new coke drums that will meet best available control technology requirements.	Chevron Products Company, El Segundo Refinery	EIR	Notice of Preparation/ Initial Study circulated for a 30-day public comment period on October 11, 2011. Comment period ended November 10, 2011. SCAQMD staff is reviewing administrative DEIR.	Environmental Audit, Inc.
The ConocoPhillips Los Angeles Refinery Ultra Low Sulfur Diesel project was originally proposed to comply with federal state, and SCAQMD requirements to limit the sulfur content of diesel fuels. Litigation against the CEQA document was filed. Ultimately the California Supreme Court concluded that the SCAQMD had used an inappropriate baseline and directed the SCAQMD to prepare an EIR, even though the project has been built and has been in operation since 2006. The purpose of this CEQA document is to comply with the Supreme Court's direction to prepare an EIR.	ConocoPhillips, Los Angeles Refinery	EIR	Notice of Preparation circulated for a 30-day public comment period on March 26, 2012. Comment period ended April 26, 2012. Consultant is revising administrative Draft EIR.	Environmental Audit, Inc.
The Carpenter company is proposing to install one 10,000 gallon bulk tank for storage of methyl formate, a flammable substance that may also have non-cancer acute health risks to humans.	Carpenter Company Storage Tank Installation Project	ND	SCAQMD staff is reviewing the administrative Draft ND.	Environmental Audit, Inc.

A shaded row indicates a new project.

# = AQMD was contacted regarding potential environmental justice concerns due to the natural and/or location of the project.

**ATTACHMENT A-2\*\***  
**INCOMING CEQA DOCUMENTS LOG**  
**JULY 1, 2012 TO JULY 31, 2012**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Airports</b> <u>LAC120731-06</u> Los Angeles International Airport Specific Plan Amendment Study	The proposed project consists of the LAX Specific Plan Amendment Study (SPAS). The SPAS serves to identify and evaluate potential alternatives to certain components of the LAX Master Plan program referred to as the Yellow Light Projects. The nine SPAS alternatives in the DEIR propose various options to the Yellow Light Projects, including one alternative that provides for implementation of all the Yellow Light Projects, another alternative that proposes none of the Yellow Light Projects, and seven alternatives that propose options to the Yellow Light Projects. Comment Period: 7/27/2012 - 10/10/2012 Public Hearing: N/A	DEIR	Los Angeles World Airports	Currently under review
<b>General Land Use (residential, etc.)</b> <u>LAC120710-04</u> Marriott Residence Inn	The proposed project consists of a new non-residential project exceeding 25,000 square feet of gross floor area; a Minor Conditional Use Permit for a new commercial project exceeding 15,000 square feet of gross area in a Transit Oriented District; and a Minor Conditional Use Permit for a "lodging-hotel" use with kitchens in more than 60 percent of the proposed guestrooms. Comment Period: 7/2/2012 - 8/2/2012 Public Hearing: N/A	NOP (No IS Attached)	City of Pasadena	AQMD commented 7/27/2012
<b>General Land Use (residential, etc.)</b> <u>LAC120710-05</u> Hahamongna Multi-Benefit/ Multi-Use Project	The proposed project consists of the following improvements: implementing a portion of the Arroyo Seco Master Plan, Hahamongna Watershed Park; Sycamore Grove Multi-Purpose Field; Westside Perimeter Trail; Restoration of Berkshire Creek; Oak Grove Field Restroom; Foothill Drain Improvements; Expanded Parking Area; and Habitat Restoration. Comment Period: 7/10/2012 - 8/23/2012 Public Hearing: N/A	NOP (No IS Attached)	City of Pasadena	AQMD commented 7/27/2012
<b>General Land Use (residential, etc.)</b> <u>LAC120713-05</u> Spring Park Senior Housing Project	The proposed project consists of the development of a 37-unit affordable senior housing project. Comment Period: N/A Public Hearing: N/A	IS	City of Gardena	Document reviewed - No comments Sent
<b>General Land Use (residential, etc.)</b> <u>ORC120713-02</u> Pacific City Project	This document consists of a notice of public hearing. The proposed project consists of minor amendments to an already approved project that includes 191,100 square feet of retail, office, restaurant, cultural, and entertainment uses; an eight-story 250 room hotel, spa, and health club; a 2.03 acre open space/park easement; and 516 multifamily residential units above the subterranean parking. Comment Period: N/A Public Hearing: 8/20/2012	Other	City of Huntington Beach	Document does not require comments

\*\*Sorted by Land Use Type (in alpha order), followed by County, then date received.

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2012 TO JULY 31, 2012**

SCAQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Industrial and Commercial</b> <u>RVC120710-02</u> Alere Property Group, LLC/Plot Plan PP3-11-02	The proposed project consists of developing the site with a 166,955 square-foot industrial building. In addition, the proposed project also accommodates a loading dock. A total of 104 trailer stalls and automobile parking spaces are provided to accommodate the proposed industrial use.  Comment Period: 7/9/2012 - 7/30/2012 Public Hearing: N/A	ND	City of Jurupa Valley	Document reviewed - No comments Sent
<b>Industrial and Commercial</b> <u>RVC120720-02</u> America's Tire	This document consists of a Planning Application No. 2012-110 for the America's Tire store. The proposed project consists of a proposed conditional use permit for the establishment of a 8,845 square-foot freestanding building for retail sales and installation of tires within a 1.34-acre project site.  Comment Period: N/A Public Hearing: N/A	Other	City of Menifee	Document does not require comments
<b>Industrial and Commercial</b> <u>RVC120727-05</u> Libery Quarry Project	The Libery Quarry Project EIR has been approved, however the original project was denied. A new application has been submitted for this project.  Comment Period: N/A Public Hearing: N/A	Other	County of Riverside	AQMD commented 7/27/2012
<b>Industrial and Commercial</b> <u>RVC120731-08</u> Navy Federal DP	This document consists of a commercial development plan application to allow Navy Federal Credit Union to construct a 4,700 square-foot one-story bank building with three drive-thru lanes.  Comment Period: N/A Public Hearing: N/A	Other	City of Temecula	Document does not require comments
<b>Industrial and Commercial</b> <u>SBC120705-01</u> Development Review DRC2011- 01094D and CUP DRC2011-01094	The proposed project consists of constructing and operating a funeral home with a floor area of 6,911 square feet and a porto cochere of 1,371 square feet on a vacant parcel of 2.32 acres.  Comment Period: 7/5/2012 - 7/25/2012 Public Hearing: 7/25/2012	Mitigated ND	City of Rancho Cucamonga	Document reviewed - No comments Sent
<b>Institutional (schools, government, etc.)</b> <u>LAC120724-04</u> Castaic High School	The proposed project consists of a comprehensive high school with approximately 250,000 square feet of building area, including several classroom buildings, a library, a performing arts building, a multipurpose building, a physical education building with gymnasium, and an administrative building.  Comment Period: N/A Public Hearing: N/A	DEIR	William S. Hart Union High School	Document reviewed - No comments Sent

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2012 TO JULY 31, 2012**

SCAQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Institutional (schools, government, etc.)</i> <u>LAC120731-10</u> Accelerated Charter Elementary School	The proposed project consists of constructing and operating a charter elementary school for 500 students in pre-K through sixth grade. Two existing charter elementary schools would combine and transfer to the proposed new school in the City of Los Angeles. The new 52,109 square-foot school would include 21 classrooms in three contiguous buildings with 37,557 square feet of enclosed building space and 14,552 square feet of open covered walkways, balconies, and lunch shelter. Comment Period: 8/1/2012 - 8/31/2012 Public Hearing: N/A	Mitigated ND	The Accelerated Schools	Currently under review
<i>Institutional (schools, government, etc.)</i> <u>RVC120705-06</u> College of the Desert West Valley Campus Facilities Master Plan and Phase I Project	The proposed project consists of a master plan that calls for a total of approximate 650,000 square feet to be constructed across five phases and will include core campus, academic partnership space and campus-related buildings. Comment Period: 6/29/2012 - 7/30/2012 Public Hearing: N/A	NOP/IS	College of the Desert	AQMD commented 7/27/2012
<i>Plans and Regulations</i> <u>LAC120705-04</u> 2010 Bicycle Plan - First year of the First Five Year Implementation Strategy and the Figueroa Streetscape Project	The proposed project consist of the first year of the first five year implementation strategy; and Figueroa Corridor Streetscape Project which is centered around separated bike lane and facilitating pedestrian activity on a three-mile stretch of South Figueroa and adjacent streets around the Staples Center. Comment Period: 7/5/2012 - 7/30/2012 Public Hearing: N/A	NOP (No IS Attached)	City of Los Angeles	AQMD commented 7/27/2012
<i>Plans and Regulations</i> <u>LAC120712-01</u> Marsh Project	This document consists of a notice of availability and notice of intent to adopt a Mitigated Negative Declaration. The proposed project consists of constructing and operating an approximately 3-acre community park. The proposed park includes: a free play meadow; a landscaped open-air picnic shelter; picnic tables; community gathering/outdoor classroom area; bioswales; restrooms; storage shed; and, a 43-car parking lot. Comment Period: 7/13/2012 - 8/18/2012 Public Hearing: N/A	Other	Mountains Recreation and Conservation Authority	Document reviewed - No comments Sent
<i>Plans and Regulations</i> <u>LAC120717-03</u> NBC Universal Evolution Plan	This document consists of a Final EIR and includes response to comments. The proposed project consists of developing an approximately 391-acre site. The project would involve a net increase of approximately 2.01 million square feet of new commercial development, which includes 500 hotel guest rooms and related hotel facilities. Comment Period: N/A Public Hearing: N/A	FEIR	City of Los Angeles	Currently under review

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2012 TO JULY 31, 2012**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Plans and Regulations</i> <u>LAC120724-01</u> Milton Street Park	The proposed project consists of constructing a linear park that would include a pedestrian pathway, overlook areas, a 10-foot by 50-foot shade structure, new access gateway, entry stairs and ADA accessible ramp, fencing, native landscaping and irrigation, site furnishings, gabion retaining walls, and interpretive panels on a 1.2-acre parcel along Milton Street, between Mascagni Street and Westlawn Avenue in the City of Los Angeles. Comment Period: 7/23/2012 - 8/22/2012 Public Hearing: N/A	Mitigated ND	Mountains Recreation & Conservation Authority	Document reviewed - No comments Sent
<i>Plans and Regulations</i> <u>LAC120726-01</u> Port of Los Angeles Master Plan Update	The proposed project consists of the Port of Los Angeles Master Plan Update. The update serves as a long-range plan to establish policies and guidelines for future development within the coastal zone boundary of the Port of Los Angeles. Comment Period: 7/26/2012 - 8/24/2012 Public Hearing: N/A	NOP/IS	Port of Los Angeles	Currently under review
<i>Plans and Regulations</i> <u>LAC120727-03</u> Safer Consumer Product Alternatives	This document consists of a Title 22, California Code of Regulations 45-day public notice and comment period for safer consumer product alternatives. Comment Period: 7/27/2012 - 9/11/2012 Public Hearing: 9/10/2012	Other	Department of Toxic Substance Control	Currently under review
<i>Plans and Regulations</i> <u>ORC120710-01</u> Heritage Fields Project 2012 General Plan Amendment and Zone Change Draft Second Supplemental EIR	The proposed project consists of residential and non-residential development in existing planning areas 51 and 30. The project includes a total of 4,894 residential units and 6,585,594 square feet of non-residential uses including the Great Park. Comment Period: 7/10/2012 - 8/24/2012 Public Hearing: N/A	Sup DEIR	City of Irvine	Currently under review
<i>Plans and Regulations</i> <u>ORC120720-01</u> Foothill Trabuco Specific Plan	This document consists of a notice of availability of a Final EIR. The proposed project consists of a residential community comprised of 65 detached single family residential units concentrated off Santiago Canyon Road. Comment Period: 7/20/2012 - 9/4/2012 Public Hearing: N/A	Other	County of Orange	Document reviewed - No comments Sent

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2012 TO JULY 31, 2012**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b><i>Plans and Regulations</i></b> <u>RVC120705-05</u> General Plan Amendment No. 1103 / Change of Zone No. 7781 / CUP No. 3241, Revised Permit No. 2	This document consists of an initial case transmittal. The proposed project consists of expansion of an existing convenience store with vehicle fuel sales by adding 1,131 square feet of building area to up to an existing 1,215 square-foot building for a total new building size of 2,346 square feet with new building and proposed addition of a 1,260 square-foot automated carwash buildings with parking lot expansions totaling 14 spaces.  Comment Period: N/A Public Hearing: 7/26/2012	Other	County of Riverside	Document does not require comments
<b><i>Plans and Regulations</i></b> <u>RVC120713-03</u> City of La Quinta General Plan Update	The proposed project consists of updates to the La Quinta General Plan, to encompass all mandated Elements, and add a Sustainable Community and an Economic Development Element. The Update will not significantly change land use patterns in the City. The Update also includes planning and land use designations for the City's Sphere of influence. A Greenhouse Gas Reduction Plan is also being proposed, in conjunction with the General Plan.  Comment Period: 7/12/2012 - 8/27/2012 Public Hearing: N/A	DEIR	City of La Quinta	Currently under review
<b><i>Plans and Regulations</i></b> <u>RVC120713-07</u> City of Menifee General Plan	The proposed project consists of the preparation of the City of Menifee's first General Plan. The seven elements will include land use, circulation, housing, conservation, open space, noise, and safety.  Comment Period: 7/11/2012 - 8/10/2012 Public Hearing: N/A	NOP/IS	City of Menifee	AQMD commented 7/31/2012
<b><i>Plans and Regulations</i></b> <u>RVC120719-03</u> La Entrada Specific Plan	The proposed project consists of the La Entrada Specific Plan which is a comprehensive amendment to and expansion of the previously - approved McNaughton Specific Plan. Although the project area would increase by 558 acres, the total number of residential units would drop from 8,000 units under the existing zoning to 7,800 units under the proposed plan.  Comment Period: 7/19/2012 - 8/18/2012 Public Hearing: N/A	NOP/IS	City of Coachella	Currently under review
<b><i>Plans and Regulations</i></b> <u>RVC120731-11</u> Motte Lakeview Ranch (Specific Plan No. 366, General Plan Amendment No. 835, Change of Zone No. 7446 and EIR No. 523)	This document consists of a notice of completion for of the Draft EIR for the implementation of a mixed-use development on the Motte Lakeview Ranch, an approximate 639-acre site. The Specific Plan would allow conversion of the property to a mixed-use development with residential, commercial, institution/educational, park, and open space uses.  Comment Period: 8/3/2012 - 9/3/2012 Public Hearing: N/A	DEIR	County of Riverside	Currently under review

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ONGOING ACTIVE PROJECTS FOR WHICH AQMD HAS  
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<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <u>RVC120713-01</u> Stagecoach Park Reclaimed Waterline Project No. 12-00IU	The proposed project consists of the construction, operation, and maintenance of a new reclaimed water pipeline that would connect from Norco's reclaimed water system located at the intersection of Bluff Street and River Road in Norco and would continue approximately 1.3 miles to the intersection of Corydon Street and Stagecoach Park in the City. The Project would be constructed entirely underground within the existing rights-of-way; the reclaimed water pipeline described above is sized at 12 inches in diameter. Comment Period: 7/13/2012 - 8/10/2012 Public Hearing: N/A	Mitigated ND	City of Corona	Document reviewed - No comments Sent
<i>Waste and Water-related</i> <u>RVC120727-04</u> CUP No. 3252, Revised Permit No. 4	This document consists of an initial case transmittal. The proposed project consists of a revised conditional use permit and revised Solid Waste Facility Permit proposed phased expansion of an existing outdoor recycling facility from 25 acres to 41 acres with projections to process up to 370,720 total tons annually. Comment Period: 7/27/2012 - 8/23/2012 Public Hearing: N/A	Other	County of Riverside	Document reviewed - No comments Sent
<i>Waste and Water-related</i> <u>SBC120717-06</u> Vulcan Water Conservation and Flood Control Project	The proposed project consists of the Vulcan Water Conservation and Flood Control Project and is proposed to be developed as a water recharge and flood control facility on the site that was previously used for aggregate mining operations. Comment Period: 7/17/2012 - 8/13/2012 Public Hearing: N/A	NOP (No IS Attached)	City of Fontana	AQMD commented 7/31/2012

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<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Utilities</i> <u>SBC120327-02</u> Calnev (Kinder-Morgan) Pipeline Expansion Project	The proposed project consists of constructing, operating and maintaining 233 miles of new 16-inch diameter pipeline on approximately 2,841 acres of land under multiple ownership in the counties of San Bernardino, CA and Clark, NV. In addition to the new pipeline, the proposed project would include a new pump station, electrical substation, and ancillary facilities near Baker, California; a new 3-mile lateral from the Bracken Junction to McCarran International Airport; and new or modified connections to new or modified laterals, valves and ancillary modifications. Comment Period: 3/23/2012 - 7/6/2012 Public Hearing: N/A	DEIR	Bureau of Land Management	AQMD commented 7/6/2012
<i>Waste and Water-related</i> <u>LAC120511-01</u> Big Tujunga Sediment Removal Project	This document consists of a notice of preparation of an Environmental Assessment for the proposed removal of 4.4 million cubic yards sediment from the Big Tujunga Reservoir and place it in the Maple Canyon Sediment Placement Site. Comment Period: 5/11/2012 - 7/15/2012 Public Hearing: N/A	Other	U.S. Department of Agriculture	AQMD commented 7/15/2012

<p><b>TOTAL NUMBER OF REQUESTS TO AQMD FOR DOCUMENT REVIEW THIS REPORTING PERIOD: 63</b>  <b>TOTAL NUMBER OF COMMENT LETTERS SENT OUT THIS REPORTING PERIOD: 24</b>  <b>TOTAL NUMBER OF DOCUMENTS REVIEWED, BUT NO COMMENTS WERE SENT: 26</b>  <b>TOTAL NUMBER OF DOCUMENTS CURRENTLY UNDER REVIEW: 25</b>  <b>TOTAL NUMBER OF DOCUMENTS THAT DID NOT REQUIRE COMMENTS: 7</b>  <b>TOTAL NUMBER OF DOCUMENTS THAT WERE NOT REVIEWED: 0</b></p>
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DEIR - Draft Environmental Impact Report  
 FEIR - Final Environmental Impact Report  
 RDEIR - Revised Draft Environmental Impact Report  
 SEIR - Subsequent Environmental Impact Report  
 SupEIR - Supplemental EIR

NOI - Notice of Intent to prepare an EIS  
 NOP - Notice of Preparation  
 IS - Initial Study  
 DEA - Draft Environmental Assessment  
 EIS - Environmental Impact Statement

FONSI - Finding of No Significant Impact  
 ND - Negative Declaration  
 Other - Typically notices of public meetings  
 N/A - Not Applicable  
 # - Project has potential environmental justice concerns due to the nature and/or location of the project.



**ATTACHMENT C-2  
ACTIVE AQMD LEAD AGENCY PROJECTS  
THROUGH JULY 31, 2012**

Project Description	Project	Type of	Status	Consultant
Shell Carson Terminal operators are proposing a permit modification to base throughput on ethanol and gasoline, not just ethanol.	Shell Carson Distribution Terminal	EIR	Public comment period for Notice of Preparation/Initial Study closed May 18, 2010. Consultant is revising administrative Draft EIR.	AECOM
Petro Diamond operators are proposing to change current permit conditions to allow an increase in the number of annual marine vessel visits to the terminal, but limit ship visits per month.	Petro Diamond Terminal Company	Not Yet Determined	Consultant preparing Initial Study	SABS Environmental Services
Operators of the Ultramar Wilmington Refinery are proposing to construct and install a 49 MW cogeneration unit to reduce the Refinery's reliance on electricity from the Los Angeles Department of Water and Power and produce steam to meet internal needs. No other refinery modifications are proposed.	Ultramar Wilmington Refinery	EIR	Notice of Preparation/Initial Study circulated for a 30-day public comment period on April 3, 2012. Comment Period ended May 3, 2012. Consultant preparing administrative Draft EIR.	Environmental Audit, Inc.
The operators of the Chevron Products El Segundo Refinery are proposing to remove six old coke "drums" and replace them with new coke drums that will meet best available control technology requirements.	Chevron Products Company, El Segundo Refinery	EIR	Notice of Preparation/ Initial Study circulated for a 30-day public comment period on October 11, 2011. Comment period ended November 10, 2011. Consultant is revising administrative DEIR.	Environmental Audit, Inc.
The ConocoPhillips Los Angeles Refinery Ultra Low Sulfur Diesel project was originally proposed to comply with federal state, and SCAQMD requirements to limit the sulfur content of diesel fuels. Litigation against the CEQA document was filed. Ultimately the California Supreme Court concluded that the SCAQMD had used an inappropriate baseline and directed the SCAQMD to prepare an EIR, even though the project has been built and has been in operation since 2006. The purpose of this CEQA document is to comply with the Supreme Court's direction to prepare an EIR.	ConocoPhillips, Los Angeles Refinery	EIR	Notice of Preparation circulated for a 30-day public comment period on March 26, 2012. Comment period ended April 26, 2012. Consultant is revising administrative Draft EIR.	Environmental Audit, Inc.
The Carpenter company is proposing to install one 10,000 gallon bulk tank for storage of methyl formate, a flammable substance that may also have non-cancer acute health risks to humans.	Carpenter Company Storage Tank Installation Project	ND	SCAQMD staff is reviewing the administrative Draft ND.	Environmental Audit, Inc.

A shaded row indicates a new project.

# = AQMD was contacted regarding potential environmental justice concerns due to the natural and/or location of the project.

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 16

REPORT: Rule and Control Measure Forecast

SYNOPSIS: This report highlights AQMD rulemaking activity and public workshops potentially scheduled for the year 2012.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

EC:LT:cg

The Rule and Control Measure Forecast Report provides the Board with a monthly update of AQMD's rulemaking and control measure implementation schedule.

219	Equipment Not Requiring a Written Permit Pursuant to Regulation II
Rule 219 is moved to November from October to allow additional time for further analysis of potential impacts and public review of the staff proposal.	
222	Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II
Rule 222 is moved to November from October to allow additional time for further analysis of potential impacts and review by stakeholders of the staff proposal.	
1401	New Source Review of Toxic Air Contaminants
1402	Control of Toxic Air Contaminants from Existing Sources
Rules 1401 and 1402 are moved to April 2013 from October to allow staff more time to perform the needed analysis to identify impacts from the Office of Environmental Health Hazard Assessment (OEHHA) actions on Reference Exposure Levels (RELs) for several compounds. These rule amendments are delayed due to staff resource constraints.	

1902	Transportation Conformity
<p>Rule 1902 is moved to December from October as staff needs additional guidance from U.S. EPA pertaining to interpretation of the 2012 Restructuring Amendments and provisions for PM2.5 areas.</p>	

## 2012 MASTER CALENDAR (continued)

Below is a list of all rulemaking activity scheduled for the year 2012. The last four columns refer to the type of rule adoption or amendment. A more detailed description of the proposed rule adoption or amendment is located in the Attachments (A through D) under the type of rule adoption or amendment (i.e. AQMP, Toxics, Other and Climate Change).

*\*An asterisk indicates that the rulemaking is a potentially significant hearing.*

*+This proposed rule will reduce criteria air contaminants and assist toward attainment of ambient air quality standards.*

*<sup>1</sup>Subject to Board approval*

*California Environmental Quality Act shall be referred to as "CEQA."*

*Socioeconomic Analysis shall be referred to as "Socio."*

### 2012

November		AQMP	Toxics	Other	Climate Change
219 <sup>1</sup>	Equipment Not Requiring a Written Permit Pursuant to Regulation II			√	
222 <sup>1</sup>	Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II			√	
1107 <sup>+</sup>	Coating of Metal Parts and Products (MCS-07)	√			
1114 <sup>*+</sup>	Control of Emissions from Refinery Coking Operations (MCS-07)	√			
1123	Pilot Program for Refinery Start-up, Shutdown and Turnaround Procedures (MCS-06)	√			
1138	Control of Emissions from Restaurant Operations (BCM-05)	√			
1420	Emissions Standard for Lead		√		
1420.2	Emissions Standard for Lead from Medium Lead Emitting Facilities		√		

**2012 MASTER CALENDAR (continued)**

**2012**

<b>December</b>					
415	Odors from Rendering Plants			√	
1450*	Indirect Sources		√		
1902	Transportation Conformity	√			
2301	Control of Emissions from New or Redevelopment Projects (EGM-01)	√			

**2012 TO-BE DETERMINED**

<b>TBD</b>		<b>AQMP</b>	<b>Toxics</b>	<b>Other</b>	<b>Climate Change</b>
102	Definition of Terms			√	
314	Fees for Architectural Coatings			√	
402	Nuisance			√	
463	Storage of Organic Liquids			√	
1178	Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities			√	
701	Air Pollution Emergency Contingency Actions			√	
1106	Marine Coating Operations (MCS-07)	√			
1106.1	Pleasure Craft Coating Operations (MCS-07)	√			
1118	Control of Emissions from Refinery Flares			√	√
1143	Consumer Paint Thinners & Multi-Purpose Solvents			√	
1144	Metalworking Fluids and Direct-Contact Lubricants			√	

**2012 MASTER CALENDAR (continued)**

**2012 TO-BE DETERMINED**

<b>TBD</b>	<b>(continued)</b>	<b>AQMP</b>	<b>Toxics</b>	<b>Other</b>	<b>Climate Change</b>
1146	Emission of Oxides of Nitrogen from Industrial, Institutional and Commercial Broilers, Steam Generators, and Process Heaters			√	
1146.1	Emissions of Oxides of Nitrogen from Small Industrial Institutional, and Commercial Boilers, Steam Generators and Process Heaters			√	
1147	NOx Reductions from Miscellaneous Sources			√	
1151 <sup>**</sup>	Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations			√	
1155	Particulate Matter (PM) Control Devices			√	
1166	Volatile Organic Compound Emissions from Decontamination of Soil			√	
1168	Adhesive and Sealant Applications			√	
1171	Solvent Cleaning Operations			√	
1173	Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants			√	√
1190 Series	Fleet Vehicle Requirements			√	
Reg. XIII	New Source Review			√	
1401	New Source Review of Toxic Air Contaminants		√		
1402	Control of Toxic Air Contaminants from Existing Sources		√		
1469.1	Spraying Operations Using Coatings Containing Chromium		√		
Reg. XX	Regional Clean Air Incentives Market (RECLAIM)			√	
2511	Credit Generation Program for Locomotive Head End Power Unit Engines			√	

**2012 MASTER CALENDAR (continued)**

**2012 TO-BE DETERMINED**

<b>TBD</b>	<b>(continued)</b>	<b>AQMP</b>	<b>Toxics</b>	<b>Other</b>	<b>Climate Change</b>
2512	Credit Generation Program for Ocean-Going Vessels at Berth			√	
Reg. XXVII	Climate Change				√
4010 <sup>*+</sup>	General Provisions and Requirements for Ports of Los Angeles and Long Beach (MOB-03)	√	√		
4020 <sup>*+</sup>	Backstop Requirements for Ports of Los Angeles and Long Beach (MOB-03)	√	√		
Reg. IV, IX, X, XI, XIV, XX and XXX Rules	Various rule amendments may be needed to meet the requirements of state and federal laws, address variance issues/technology-forcing limits, or to seek additional reductions to meet the SIP short-term measure commitment. The Clean Communities Plan (CCP) has been updated to include new measures to address toxic emissions in the basin. The CCP includes a variety of measures that will reduce exposure to air toxics from stationary, mobile, and area sources. Rule amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures.	√	√	√	√

Note: AQMD may add control measures necessary to satisfy federal requirements, to abate a substantial endangerment to public health or welfare, state regulatory requirements or SIP commitment.

# ATTACHMENT A

## AQMP Rule Activity Schedule

This attachment lists those control measures that are being developed into rules or rule amendments for the Governing Board consideration that are designed to implement the amendments to the 2007 Air Quality Management Plan.

**2012**

<b>November</b>	
1107 <sup>+</sup>	<p><b>Coating of Metal Parts and Products (MCS-07)</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments to Rule 1107 would further reduce VOC emissions and improve rule clarity and enforceability.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1114 <sup>*+</sup>	<p><b>Control of Emissions from Refinery Coking Operations (MCS-07)</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed Rule 1114 will establish emission limits and other requirements for the operation of coking units at petroleum refineries.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1123	<p><b>Pilot Program for Refinery Start-up, Shutdown and Turnaround Procedures (MCS-06)</b>  <i>[Projected Emission Reduction: N/A]</i>                      Rule 1123 would implement 2007 AQMP Control Measure MCS-06 by identifying improved operating procedures and best management practices to reduce emissions from start-up, shutdown and turnaround operations.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1138	<p><b>Control of Emissions from Restaurant Operations (BCM-05)</b>  <i>[Projected Emission Reduction: 2007 AQMP Commitment of 1.1 tpd PM2.5 reductions by 2014]</i>                      Rule 1138 currently applies solely to chain-driven charbroilers. PAR 1138 will implement 2007 AQMP Control Measure BCM-05 for the reduction of PM2.5 emissions from under-fired charbroilers. Staff has contracted with UCR CE-CERT for the testing and demonstration of affordable and effective particulate control technologies for under-fired charbroilers. Staff will propose amendments to Rule 1138 based on the results of those studies.  <i>Philip Fine 909.396.2239 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>



# ATTACHMENT A

## AQMP Rule Activity Schedule (continued)

**2012**

<b>December</b>	
1902	<p><b>Transportation Conformity</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments to Rule 1902 will bring the District’s Transportation Conformity rule in line with current U.S. EPA requirements.  <i>Carol Gomez, 909.396.3264 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
2301	<p><b>Control of Emissions from New or Redevelopment Projects (EGM-01)</b>  <i>[Projected Emission Reduction: Committed to reduce 0.5 tons per day of VOC, 0.8 tons per day of NOx, and 0.5 tons per day of PM2.5 in 2023.]</i>                      The proposed rule will implement the 2007 AQMP Control Measure EGM-01 – Emission Reductions from New or Redevelopment Projects. Since the initial proposal was released for PR2301, CARB in compliance with an SB 375 requirement has set greenhouse gas emission reduction targets for each metropolitan planning organization (MPO). SCAG’s 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) will contain the plan for how these target emission reductions will be met. In light of this development, PR2301 will be drafted as a backstop/contingency measure to ensure that the co-benefits of VOC, NOx, and PM 2.5 emission reductions from the SCS will meet the 2007 AQMP targets.  <i>Carol Gomez, 909.396.3264 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>

## To-Be Determined 2012

<b>To-Be Determined</b>	
1106	<p><b>Marine Coating Operations (MCS-07)</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed amendments will further reduce VOC emissions from the application of marine coatings. Amendments may also improve clarity and enforceability.  <i>Naveen Berry, 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1106.1	<p><b>Pleasure Craft Coating Operations (MCS-07)</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments to Rule 1106.1 will reduce VOC emissions from the application of coatings to pleasure craft and improve the enforceability and clarity of the rule.  <i>Naveen Berry, 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>

# ATTACHMENT A

## AQMP Rule Activity Schedule (continued)

### To-Be Determined 2012

<b>To-Be Determined</b>	
4010 <sup>*+</sup>	<p><b>General Provisions and Requirements for Ports of Los Angeles and Long Beach (MOB-03)</b></p> <p><b>Backstop Requirements for Ports of Los Angeles and Long Beach (MOB-03)</b></p> <p><i>[Projected Emission Reduction: TBD]</i></p> <p>The proposed rules will address toxic and criteria pollutant emissions from new and existing port-related sources.</p> <p><i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
4020 <sup>*+</sup>	
Reg. IV, IX, X, XI, XIV, XX and XXX Rules	<p>Various rule amendments may be needed to meet the requirements of state and federal laws, address variance issues/technology-forcing limits, or to seek additional reductions to meet the SIP short-term measure commitment.</p>

# ATTACHMENT B

## Toxics Rule Activity Schedule

This attachment lists those rules or rule amendments for the Governing Board consideration that are designed to implement the Air Toxics Control Plan.

2012

<b>November</b>	
1420	<b>Emissions Standard for Lead</b>
1420.2	<b>Emissions Standard for Lead from Medium Lead Emitting Facilities</b> <i>[Projected Emission Reduction: TBD]</i> In October 2008, U.S. EPA lowered the National Ambient Air Quality Standard for lead from 1.5 to 0.15 ug/m3. Proposed Amended Rule 1420 and Proposed Rule 1420.2 will apply to lead sources and will include requirements to ensure the Basin meets the new lead standard. <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i>
<b>December</b>	
1450*	<b>Indirect Sources</b> <i>[Projected Emission Reduction: TBD]</i> Proposed Rule 1450 will identify approaches to reduce localized NOx and air toxic emissions and exposure from facilities associated with large indirect sources (i.e. facilities that attract mobile sources). <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i>

## ATTACHMENT B

### Toxics Rule Activity Schedule (continued)

#### To-Be Determined 2012

To-Be Determined	
1401 1402	<p><b>New Source Review of Toxic Air Contaminants</b></p> <p><b>Control of Toxic Air Contaminants from Existing Sources</b>  <i>[Projected Emission Reduction: TBD]</i>                      The Office of Environmental Health Hazard Assessment (OEHHA) periodically reviews the list of toxic compounds and revises or establishes risk values. Rules 1401 and 1402 will be amended to revise the list of TACs. OEHHA is currently revising their risk assessment guidelines and, when adopted, District guidelines will be amended requiring Board approval. In addition, other administrative changes may be proposed.  <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1469.1	<p><b>Spraying Operations Using Coatings Containing Chromium</b>  <i>[Projected Emission Reduction: TBD]</i>                      Staff will evaluate opportunities for reducing chrome emissions from various spray coating operations.  <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
4010 <sup>*+</sup> 4020 <sup>*+</sup>	<p><b>General Provisions and Requirements for Ports of Los Angeles and Long Beach (MOB-03)</b></p> <p><b>Backstop Requirements for Ports of Los Angeles and Long Beach (MOB-03)</b>  <i>[Projected Emission Reduction: TBD]</i>                      The proposed rules will address toxic and criteria pollutant emissions from new and existing port-related sources.  <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
Reg. IV, IX, X, XI, XIV, XX and XXX Rules	<p>Various rule amendments may be needed to meet the requirements of state and federal laws, address variance issues/technology-forcing limits. Rule amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures.</p>

# ATTACHMENT C

## Other Rule Activity Schedule

This attachment lists those rules or rule amendments for the Governing Board consideration that are designed to improve rule enforceability, SIP corrections, or implementing state or federal regulations.

**2012**

<b>October</b>	
219 <sup>1</sup>	<p><b>Equipment Not Requiring a Written Permit Pursuant to Regulation II</b>  <i>[Projected Emission Reduction: N/A]</i>                      Staff will consider exempting low emitting processes/equipment that require written permits, and include them under the Rule 222 Filing Program, thus streamlining the permitting process and reducing the cost for facilities and clarify permitting requirements for several other processes.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
222 <sup>1</sup>	<p><b>Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II</b>  <i>[Projected Emission Reduction: N/A]</i>                      Staff will evaluate currently permitted equipment with very low emissions and consider incorporating into the Rule 222 Filing Program. In addition, staff will evaluate other equipment currently exempt from permits, but subject to source specific rules, for inclusion into Rule 222 Filing Program.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
<b>December</b>	
415	<p><b>Odors from Rendering Plants</b>  <i>[Projected Emission Reduction: TBD]</i>                      As part of the implementation of the 2010 Clean Communities Plan, staff is examining odor control techniques for rendering facilities and may propose a new regulation based on the staff analysis.  <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>

# ATTACHMENT C

## Other Rule Activity Schedule (continued)

### To-Be Determined 2012

<b>To-Be Determined</b>	
102	<p><b>Definition of Terms</b>  <i>[Projected Emission Reduction: N/A]</i>                      Proposed amendments to Rule 102 may be necessary to include compounds exempted by the U.S. EPA with consideration for health risks as defined by the Office of Environmental Health Hazard Assessment (OEHHA).  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
314	<p><b>Fees of Architectural Coatings</b>  <i>[Projected Emission Reduction: TBD]</i>                      The proposed amendments would improve clarity and reporting requirements as well as consider an exemption from fees for small manufacturers.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
402	<p><b>Nuisance</b>  <i>[Projected Emission Reduction: TBD]</i>                      The AQMD staff will assess the feasibility of expanding the current nuisance rule as part of a proposed measure in the Clean Communities Plan (CCP). The assessment may result in a recommendation to amend Rule 402 to make it more effective and more responsive to public complaints.  <i>Susan Nakamura 909.396.3105 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
463 1178	<p><b>Storage of Organic Liquids</b>  <b>Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities</b>  <i>[Projected Emission Reduction: TBD]</i>                      Staff will evaluate the opportunity of harmonizing the two rules into one and be prepared to address any stakeholder feedback in response to recent amendments to Rule 463.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
701	<p><b>Air Pollution Emergency Contingency Actions</b>  <i>[Projected Emission Reduction: N/A]</i>                      Proposed amendments to Rule 701 will update air quality standards and episode criteria.  <i>Joe Cassmassi 909.396.3155 909.396.3155 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1118	<p><b>Control of Emissions from Refinery Flares</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments may be necessary to address results of the additional analysis required by the adopting resolution for the last amendment and to consider the advances in monitoring technology. Amendments may also be necessary to implement an AB 32 measure.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>

# ATTACHMENT C

## Other Rule Activity Schedule (continued)

### To-Be Determined 2012

To-Be Determined	(continued)
1143	<p><b>Consumer Paint Thinners &amp; Multi-Purpose Solvents</b>  <i>[Projected Emission Reduction: N/A]</i>                      Proposed amendments may be necessary for further clarification and possible exemptions.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1144	<p><b>Metalworking Fluids and Direct-Contact Lubricants</b>  <i>[Projected Emission Reduction: N/A]</i>                      Proposed amendments may be necessary to incorporate results from ongoing technology assessments for specific facilities.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1146	<p><b>Emission of Oxides of Nitrogen from Industrial, Institutional and Commercial Broilers, Steam Generators, and Process Heaters</b>  <i>[Projected Emission Reduction: unknown]</i>                      Proposed amendments will address expected U.S. EPA comments on compliance issues.  <i>Joe Cassmassi 909.396.3155 909.396.3155 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1146.1	<p><b>Emissions of Oxides of Nitrogen from Small Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters</b>  <i>[Projected Emission Reduction: unknown]</i>                      Proposed amendments to will address expected U.S. EPA comments on compliance issues.  <i>Joe Cassmassi 909.396.3155 909.396.3155 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1147	<p><b>NOx Reductions from Miscellaneous Sources</b>  <i>[Projected Emission Reduction: N/A]</i>                      Proposed amendments will provide ongoing staff reports to committee relative to impacts to less-than-one-ton-per-day sources.  <i>Joe Cassmassi 909.396.3155 909.396.3155 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1151 <sup>*+</sup>	<p><b>Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments to the rule may be necessary to reflect further findings relative to recordkeeping requirements for tertiary butyl acetate (TBAC).  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1155	<p><b>Particulate Matter (PM) Control Devices</b>  <i>[Projected Emission Reduction: TBD]</i>                      With the implementation Rule 1155, amendments may be necessary to address the potential exemption of small PM emitters to minimize adverse impacts of the rule requirements where there is no real impact on visible emissions.  <i>Philip Fine 909.396.2239 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>

## ATTACHMENT C

### Other Rule Activity Schedule (continued)

#### To-Be Determined 2012

<b>To-Be Determined</b>	<b>(continued)</b>
1166	<p><b>Volatile Organic Compound Emissions from Decontamination of Soil</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments to Rule 1166 may be necessary to clarify certain elements of the rule.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1168	<p><b>Adhesive and Sealant Applications</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments to Rule 1168 may be necessary to reflect improvements in adhesive and sealants technology.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1171	<p><b>Solvent Cleaning Operations</b>  <i>[Projected Emission Reduction: N/A]</i>                      The proposed amendment may consider technology assessments for the cleanup of affected equipment.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1173	<p><b>Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendment to Rule 1173 may be necessary to address greenhouse gas emissions from petroleum facilities and chemical plants and clarify other provisions of the rule.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1190 Series	<p><b>Fleet Vehicle Requirements</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments to Rule 1190 series fleet rules may be necessary to address remaining outstanding implementation issues and in the event the court's future action requires amendments. In addition, the current fleet rules may be expanded to achieve additional air quality and air toxic benefits.  <i>Dean Saito 909.396.2647 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
Reg. XIII	<p><b>New Source Review</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed amendments will address U.S. EPA comments on SIP approvability issues and/or requirements that may result from U.S. EPA amendments, legislation or CARB requirements. Amendments may also be proposed for clarity and improved enforceability.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
Reg. XX	<p><b>Regional Clean Air Incentives Market (RECLAIM)</b>  <i>[Projected Emission Reduction: N/A]</i>                      Staff will explore opportunities to improve the administrative efficiency of the program.  <i>Joe Cassmassi 909.396.3155 909.396.3155 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>



## ATTACHMENT C

### Other Rule Activity Schedule (continued)

#### To-Be Determined 2012

<b>To-Be Determined</b>	
2511	<p><b>Credit Generation Program for Locomotive Head End Power Unit Engines</b>  <i>[Projected Emission Reduction: TBD]</i>                      Develop a rule to allow generation of PM mobile source emission reduction credits from Locomotive Head End Power Unit Engines. Credits will be generated by retrofitting engines with PM controls or replacing the engines with new lower-emitting engines.  <i>Randall Pasek 909.396.2251 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
2512	<p><b>Credit Generation Program for Ocean-Going Vessels at Berth</b>  <i>[Projected Emission Reduction: TBD]</i>                      Develop a rule to allow generation of PM, NOx and SOx emission reduction credits from ocean-going vessels while at berth. Credits will be generated by controlling the emissions from auxiliary engines and boilers of ships while docked.  <i>Randall Pasek 909.396.2251 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
Reg. IV, IX, X, XI, XIV, XX and XXX Rules	<p>Various rule amendments may be needed to meet the requirements of state and federal laws, address variance issues/technology-forcing limits.</p>

# ATTACHMENT D

## Climate Change

This attachments lists rules or rule amendments for the Governing Board consideration that are designed to implement South Coast Air Quality Managements District’s Climate Change Policy or for consistency with state or federal rules.

### To-Be Determined 2012

<b>To-Be Determined</b>	
1118	<p><b>Control of Emissions from Refinery Flares</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments may be necessary to address findings from the additional analysis required by the adopting resolution for the last amendment. Amendments may also be necessary to implement an AB 32 measure.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
1173	<p><b>Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendment to Rule 1173 may be necessary to address greenhouse gas emissions from petroleum facilities and chemical plants and clarify other provisions of the rule.  <i>Naveen Berry 909.396.2363 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
Reg. XXVII	<p><b>Climate Change</b>  <i>[Projected Emission Reduction: TBD]</i>                      Additional protocols may be added to Rules 2701 and 2702.  <i>Philip Fine 909.396.2239 CEQA: Smith (3054) Socio: Lieu (3059)</i></p>
Reg. IV, IX, X, XI, XIV, XX and XXX Rules	<p>Various rule amendments may be needed to meet the requirements of state and federal laws to address variance issues/technology-forcing limits.</p>

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 17

PROPOSAL: Report of RFPs and RFQs Scheduled for Release in September

SYNOPSIS: This report summarizes the RFPs and RFQs for budgeted services over \$75,000 scheduled to be released for advertisement for the month of September.

COMMITTEE: Administrative, July 20, 2012; Recommended for Approval

RECOMMENDED ACTION:

Approve the release of RFPs/RFQs for the month of September.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:lg

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### **Background**

At its January 8, 2010 meeting, the Board approved a revised Procurement Policy and Procedure. Under the revised policy, RFPs and RFQs for budgeted items over \$75,000, which follow the Procurement Policy and Procedure, no longer require individual Board approval. However, a monthly report of all RFPs and RFQs over \$75,000 is included as part of the Board agenda package and the Board may, if desired, take individual action on any item. The report provides the title and synopsis of the RFP or RFQ, the budgeted funds available, and the name of the Deputy Executive Officer/Asst. 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/rfp/index.html> following Board approval on September 7, 2012.

### **Outreach**

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

Additionally, potential bidders may be notified utilizing AQMD's own electronic listing of certified minority vendors. Notice of the RFP/RFQ will be e-mailed to the Black and

Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at AQMD's website (<http://www.aqmd.gov>) where it can be viewed by making menu selections "Inside AQMD"/"Employment and Business Opportunities"/"Business Opportunities" or by going directly to <http://www.aqmd.gov/rfp/index.html>). Information is also available on AQMD's bidder's 24-hour telephone message line (909) 396-2724.

**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 RFPs and RFQs Scheduled for Release in September

**September 7, 2012 Board Meeting  
Report on RFPs and RFQs Scheduled for Release on September 7, 2012**

(For detailed information visit AQMD's website at  
<http://www.aqmd.gov/rfp/index.html> following Board approval on September 7, 2012)

**STANDARDIZED SERVICES**

RFP #P2013-03 Issue Request for Proposal for Janitorial Services at JOHNSON/3018  
Diamond Bar Headquarters

The current janitorial services contract expires February 28, 2013. This action is to issue an RFP to solicit bids from interested parties in order to secure a new three-year contract for this service. Funds for this service are included in the FY 2012-13 Budget and will be included in budgets for each of the remaining fiscal years of the contract.

**RESEARCH AND DEVELOPMENT OR SPECIAL TECHNICAL EXPERTISE**

NONE

**REQUESTS FOR QUALIFICATIONS - Prequalified Vendor List**

NONE

**REQUEST FOR QUOTATIONS – Commercial Off-the-Shelf Equipment**

NONE

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 18

REPORT: FY 2011-12 Contract Activity

SYNOPSIS: This report lists the number of contracts let during FY 2011-12, the respective dollar amounts, award type, and the authorized contract signatory for the AQMD. This report includes the data provided in the March 2012 report covering contract activity for the first six months of FY 2011-12.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:DH:EA:lg

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### **Background**

Since FY 1995-96, staff has provided semi-annual reports to the Governing Board on contract activity. This report identifies five categories of contract awards: 1) New Awards – new contracts for professional services and research projects; 2) Other – air monitoring station leases, Board Assistant agreements, or miscellaneous lease agreements that generate revenue, e.g., lease of AQMD space; 3) Sponsorships – contracts funding public events and technical conferences which provide air quality benefits; 4) Amendments – modifications to existing contracts usually reflecting changes in the project scope and/or schedule; 5) Terminated Contracts – Partial Work Performed – modifications to contracts to reflect termination of a portion or all of the work which result in de-obligation of contract funding. The report further specifies under New Awards, which contracts were awarded competitively and which were awarded on a sole-source basis. Within the first four categories, the level of approval (Board or Executive Officer) is indicated.

**Summary**

Of the 831 contracts and modifications (including terminations) issued during this period, New Awards accounted for 471, Other accounted for 29, Sponsorships accounted for 13, and Modifications accounted for 260. The total value for New Awards was \$87,990,898.14. Of that amount, \$77,990,451 or 88.6% was awarded through the competitive process. The total value of all contracts and amendments for this period was \$96,528,242.67 with 506 contracts and amendments totaling \$93,885,234.14 approved by the Board and 267 contracts and amendments totaling \$2,254,058.53 approved by the Executive Officer. This does not include modifications for termination with partial work or no work completed which is addressed below. Of this latter amount \$621,162.00 representing 20 contracts was for Board Member Assistant contracts as approved by the Board's Administrative Committee; \$544,477.53 representing 23 contracts was sole sourced in the areas of litigation/legal services (\$215,000.00), technical consulting (\$170,950.00), and miscellaneous (\$158,527.53); \$183,500.00 representing 13 contracts was for sponsorships in advanced technologies and community and business outreach; and \$615,407.00 representing 204 contracts was for contract modifications for extensions of time or additional budgeted services from previously approved vendors. Contract terminations with partial or no work completed numbered 58 during this period and de-obligated a total of \$16,279,728.64.

<b>CONTRACT CATEGORY</b>	<b>NUMBER</b>	<b>AMOUNT</b>
NEW AWARDS	471	\$87,990,898.14
OTHER	29	\$ 776,689.53
SPONSORSHIPS	13	\$ 183,500.00
MODIFICATIONS	260	\$ 7,188,205.00
TERMINATIONS	58	-\$16,279,728.64

**Attachment**

Contract Activity Report for the Period July 1, 2011 through June 30, 2012

**South Coast Air Quality Management District  
Contract Activity Report  
July 1, 2011 - June 30, 2012**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
<b>I. NEW AWARDS</b>							
<b>Competitive - Board Approved</b>							
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11050	27	DEVELOP PROTOTYPE NATURAL GAS-FIRED, GAN-TYPE CENTRAL FURNACES WITH REDUCED NOX EMISSIONS	BECKETT GAS, INC.	\$379,386.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11181	32	REPOWER 3 MAIN AND 1 AUXILIARY ENGINES ON 2 MARINE VESSELS	AMERICAN MARINE CORP	\$223,086.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11538	52	INSTALL AND MAINTAIN AIR FILTRATION SYSTEMS IN WILMINGTON AREA SCHOOLS	IQAIR NORTH AMERICA, INC.	\$5,400,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11567	81	PROP 1B NEW TRUCK REPLACEMENTS (NON-PORT)	TOTAL TRANSPORTATION SVCS, INC.	\$700,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11588	36	CONDUCT CONCEPTUAL FEASIBILITY STUDY FOR REDUCTION OF NEAR ROADWAY POLLUTANT EXPOSURES	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$113,268.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11611	31	IN-USE EMISSIONS TESTING AND DEMONSTRATION OF RETROFIT TECHNOLOGY OF ON-ROAD HEAVY-DUTY ENGINES	WEST VIRGINIA UNIVERSITY RESEARCH CORP	\$734,742.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11612	31	IN-USE EMISSIONS TESTING & DEMONSTRATION OF RETROFIT TECHNOLOGY OF ON-ROAD HEAVY-DUTY ENGINES	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$689,742.00	
26	PLANNING RULE DEV & AREA SOURCES	C11613	49	GREENHOUSE REDUCTION PROJECT	LOS ANGELES CONSERVATION CORPS	\$298,100.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11616	56	MOU FOR VRRROM PROGRAM	FOUNDATION FOR CALIF COMMUNITY COLLEGES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11624	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JOSE RODELO	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11625	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	NABOR NAVARRO RIOS	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11626	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	RICARDO RODRIGUEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11627	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	GERARDO GONZALEZ TRUCKING	\$0.00	1



**South Coast Air Quality Management District  
Contract Activity Report  
July 1, 2011 - June 30, 2012**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11629	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	CARLOS R. HERNANDEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11631	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	EDWAR S. MOJICA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11632	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	LUCIANO GALINDO	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11633	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	GUILLERMO CERVANTES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11637	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ROBERTO CARLOS CRUZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11644	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ALBERTO'S TRUCKING GROUP, INC.	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11648	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	MARIO BELTETON	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11653	80	REPOWER 1 OFF-ROAD VEHICLE	TRENCH SHORING COMPANY	\$36,051.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11657	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	RUDY VERNON GOMEZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11659	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	NICOLAS GUZMAN	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11660	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	BRISENO'S TRUCKING	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11663	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	DAVID STEINHauer	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11664	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	HELADIN RUIZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11668	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JAIRO MARIN	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11675	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	HERIBERTO CHAMAN	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11677	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	GENARO REYES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11681	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JULIO ARRAZOLA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11682	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	HECTOR AVINA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11683	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ADVANCED LOGISTICS MANAGEMENT INC.	\$0.00	1

**South Coast Air Quality Management District  
Contract Activity Report  
July 1, 2011 - June 30, 2012**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11689	32	REPOWER 1 RUBBER-TIRED LOADER AND 1 SPEED SWING	J.A. PLACEK CONSTRUCTION CO.	\$57,895.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11693	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	MIGUEL HERNANDEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11696	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	LUIS GUARDADO LOPEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11697	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	HENRI S. AMAYA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11699	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ERICK DOMINGUEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11702	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	E TRUCKING	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11703	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	NELSON ALFREDO PENA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11706	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	BERNARDO RAFAEL	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11709	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ALEJANDRO HERNANDEZ	\$0.00	1
16	ADMINISTRATIVE & HUMAN RESOURCES	C11711	01	WORKERS' COMPENSATION CLAIM THIRD PARTY ADMINISTRATION	ACME ADMINISTRATORS INC	\$120,444.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11712	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ANTONIO BAHENA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11714	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	J & J TRANSPORTATION, LLC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11720	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	DDR TRANSPORT, INC.	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11724	32	REPOWER 6 OFF-ROAD SCRAPERS	TINA MCMINN EQUIPMENT RENTALS, INC.	\$839,153.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11727	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JOSE TORRES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11728	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JOSE ROBERTO CLEMENTE	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11729	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	MIGUEL RESENDEZ CORTEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11731	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	RAUL AYON	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11733	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	BNJ TRANS	\$0.00	1

**South Coast Air Quality Management District  
Contract Activity Report  
July 1, 2011 - June 30, 2012**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11734	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JESUS MENA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11736	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	RAMON H VASQUEZ	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12021	80	REPOWER AND RETROFIT 4 OFF-ROAD VEHICLES.	GEERLINGS EQUIPMENT RENTAL, INC	\$718,666.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12029	40	NATURAL GAS VEHICLE CYLINDER SAFETY, EDUCATION, CYLINDER TRACKING AND FAILURE RESEARCH	CLEAN VEHICLE EDUCATION FOUNDATION	\$32,640.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12041	59	VIP PROGRAM APPROVED DEALER	KDH USED TRUCK SALES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12042	59	VIP PROGRAM APPROVED DEALER	ARROW TRUCK SALES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12043	59	VIP PROGRAM APPROVED DEALER	BIG T'S FREIGHTLINER	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12044	59	VIP APPROVED DISMANTLERS	TRANSPORTATION COMMERCE INC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12045	59	VIP PROGRAM APPROVED DEALER	BOYLE TRUCKS OF FONTANA, INC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12046	59	VIP PROGRAM APPROVED DEALER	GIBBS INTERNATIONAL INC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12047	59	VIP PROGRAM APPROVED DEALER	DYNAMIC TRUCK SALES, INC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12048	32	REPOWER 7 ROUGH TERRAIN FORKLIFTS	SOCAL FRAMING INC.	\$118,860.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12050	59	VIP APPROVED DISMANTLER	AMERICAN METAL RECYCLING	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12051	59	VIP APPROVED DISMANTLER	SOUTHLAND TRUCK & EQUIPMENT	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12053	59	VIP APPROVED DISMANTLER	AADLEN BROS AUTO WRECKING	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12054	59	VIP APPROVED DISMANTLER	LKQ AUTO PARTS OF CENTRAL CALIFORNIA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12055	59	VIP PROGRAM APPROVED DEALER	RINCON TRUCK CENTER INC.	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12056	59	VIP APPROVED DISMANTLER	SAN CLEMENTE TRUCK & AUTO RECYCLING	\$0.00	1

**South Coast Air Quality Management District  
Contract Activity Report  
July 1, 2011 - June 30, 2012**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
08	LEGAL	C12074	01	PROVIDE ENVIRONMENTAL LEGAL SERVICES	PC LAW GROUP	\$10,000.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12076	32	REPOWER 2 ROUGH TERRAIN FORKLIFTS	FRANK S. SMITH MASONRY, INC	\$33,960.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12077	32	REPOWER 7 ROUGH TERRAIN FORKLIFTS	LUCAS & MERCIER CONSTRUCTION, INC	\$67,920.00	
17	CLERK OF THE BOARDS	C12078	01	PROVIDE LEGAL REPRESENTATION FOR THE HEARING BOARD FOR FISCAL YEAR 2011- 2012	STRUMWASSER & WOOCHEER LLP	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12079	32	REPOWER 25 ON-ROAD VEHICLES	WASTE MANAGEMENT COLLECTION & RECYCLING	\$1,181,784.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12081	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	FELIX O. MIRANDA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12086	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ROGELIO GALLARDO	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12090	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	OSCAR D REYES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12094	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	AVILES & SONS TRUCKING	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12102	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	NUNEZ TRANSPORTATION, INC.	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12103	32	REPLACE 3 CRAWLER TRACTORS	SUKUT CONSTRUCTION, INC.	\$2,245,736.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12107	32	REPOWER 6 OFF-ROAD VEHICLES	J.A. PLACEK CONSTRUCTION CO.	\$73,915.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12108	32	REPOWER 7 ROUGH TERRAIN FORKLIFTS	ACOUSTICAL MATERIAL SERVICES	\$118,048.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12110	32	REPLACE 1 DIESEL LOADER AND 1 DIESEL BACKHOE	CITY OF YUCAIPA	\$42,392.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12113	31	RETROFIT 3 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	GRILEY AIR FREIGHT	\$15,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12114	31	RETROFIT 3 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	SOUTH BOUND EXPRESS, INC.	\$15,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12115	31	RETROFIT HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	TRANSLOADING EXPRESS	\$15,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12117	31	RETROFIT ONE HEAVY-DUTY DIESEL TRUCK WITH A DIESEL PARTICULATE FILTER	RANJAN RAJASEKARA	\$5,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12118	31	RETROFIT 13 DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	NATIONAL READY MIXED CONCRETE CO.	\$65,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12120	31	RETROFIT 40 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	STANDARD CONCRETE PRODUCTS INC.	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12121	31	RETROFIT 3 HEAVY DUTY DIESEL TRUCKS WITH PARTICULATE FILTERS	CHALLENGE DAIRY PRODUCTS, INC	\$15,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12122	31	RETROFIT 2 DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	BEAR TRUCKING, INC	\$5,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12123	31	RETROFIT 107 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	RRM PROPERTIES, LTD - LSR	\$535,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12124	31	RETROFIT 9 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	GAIO TRUCKING, INC	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12125	31	RETROFIT 4 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	SPRAGUES' ROCK AND SAND CO.	\$20,000.00	
04	FINANCE	C12127	32	PURCHASE AND INSTALL ON-BOARD SHORE POWER RETROFIT EQUIPMENT ON A PASSENGER VESSEL	CARNIVAL CRUISE LINES	\$1,600,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12133	32	REPOWER 7 DIESEL OFF-ROAD CONSTRUCTION VEHICLES	SUKUT CONSTRUCTION, INC.	\$1,210,379.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12135	31	UPGRADE CNG FUELING STATION	PLACENTIA-YORBA LINDA UNIFIED SCH DIST	\$60,000.00	
27	INFORMATION MANAGEMENT	C12151	01	CONTRACT FOR SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	SIERRA CYBERNETICS INC	\$240,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12153	32	REPOWER 6 DIESEL OFF ROAD CONSTRUCTION EQUIPMENT	CASH GRADING CONTRACTORS INC	\$1,016,318.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12156	32	REPLACE 2 OFF-ROAD TRACTORS	GREEN ACRES RANCH, INC	\$77,698.00	
27	INFORMATION MANAGEMENT	C12157	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	PRELUDE SYSTEMS, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12159	32	REPOWER 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	AQUA SPECIALTIES INC.	\$22,452.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12160	32	REPOWER OF 11 MAIN ENGINES IN 10 MARINE VESSELS	ISLAND ENTERPRISES, INC.	\$170,761.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12161	32	REPOWER 2 MAIN AND 2 AUXILLARY ENGINES ON 2 MARINE VESSELS	SANTA CATALINA ISLAND COMPANY	\$64,837.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12162	32	REPOWER OF 1 MAIN ENGINE AND 1 AUXILIARY ENGINE ON A MARINE VESSEL	THANH H. NGUYEN	\$152,800.00	
26	PLANNING RULE DEV & AREA SOURCES	C12164	36	NATURAL GAS HEARTH PRODUCT INCENTIVE PROGRAM	RASMUSSEN IRON WORKS, INC.	\$200,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12165	36	NATURAL GAS HEARTH PRODUCT INCENTIVE PROGRAM	RH PETERSON CO	\$200,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12166	36	NATURAL GAS HEARTH PRODUCT INCENTIVE	FMI PRODUCTS, LLC	\$100,000.00	
08	LEGAL	C12170	01	CEQA/ENVIRONMENTAL LAW	BEST BEST & KRIEGER	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12171	80	REPOWER 6 ROUGH TERRAIN FORKLIFTS	BLF, INC	\$101,184.00	
03	EXECUTIVE OFFICE	C12172	01	SIGNATURE AQMD FILM - 5 ADDITIONAL PLUG-IN VIDEOS	CINEMA VERTIGE, LLC	\$11,240.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12175	31	RETROFIT 7 HEAVY-DUTY DIESEL TRUCKS WITH DPF FILTERS	RRM PROPERTIES, LTD - LSR	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12176	32	REPLACEMENT OF 60 OFF-ROAD DIESEL VEHICLES	RRM PROPERTIES, LTD - LSR	\$1,261,510.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12179	32	REPOWER 1 OFF-ROAD VEHICLE - SOON PROGRAM	OC WASTE & RECYCLING	\$86,612.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12180	80	REPOWER 9 ROUGH TERRAIN FORKLIFTS	COUNTY LINE FRAMING, INC.	\$151,776.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12181	32	REPOWER 7 ROUGH TERRAIN FORKLIFTS	WESTSIDE BUILDING MATERIALS CORPORTATION	\$118,048.00	
03	EXECUTIVE OFFICE	C12182	01	FEATURE AIR QUALITY AND CHECK BEFORE YOU BURN REPORTS DURING MORNING WEATHER REPORT SEGMENTS	KCBS TV	\$43,350.00	
03	EXECUTIVE OFFICE	C12183	01	FEATURE AIR QUALITY AND CHECK BEFORE YOU BURN REPORTS DURING MORNING WEATHER REPORT SEGMENTS	KTLA TELEVISION, INC.	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12186	31	RETROFIT 25 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	PIPELINE CARRIERS, INC.	\$125,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12187	80	REPOWER 4 ROUGH TERRAIN FORKLIFTS	INTERNATIONAL CARGO EQUIPMENT, INC.	\$143,334.00	

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27	INFORMATION MANAGEMENT	C12188	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE & SUPPORT SERVICES	VARSun ETECHNOLOGIES GROUP, INC	\$195,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12190	32	REPOWER 2 MAIN AND 2 AUXILIARY ENGINES ON 1 MARINE VESSEL	DANA WHARF SPORTFISHING	\$553,362.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12191	32	REPOWER 2 MAIN AND 2 AUXILIARY ENGINES ON A MARINE VESSEL	OC OCEAN ADVENTURE, INC.	\$222,750.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12192	32	REPOWER 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	PRO'S CHOICE - MR. CHUM, INC.	\$108,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12194	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	CLINT PALMER	\$86,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12196	32	REPOWER 19 OFF-ROAD VEHICLES	RRM PROPERTIES, LTD - LSR	\$1,817,186.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12198	32	REPOWER OF 1 MAIN ENGINE AND 2 AUXILIARY ENGINES ON A MARINE VESSEL	BY VAN NGUYEN	\$179,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12199	32	REPOWER OF 2 MAIN AND 2 AUXILIARY ENGINES ON ONE MARINE VESSEL	BOTTOM SCRATCHER CHARTERS	\$226,400.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12200	01	SACRAMENTO LEGISLATIVE REPRESENTATION	GONZALEZ, QUINTANA & HUNTER, LLC	\$114,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12201	01	SACRAMENTO LEGISLATIVE REPRESENTATION	JOE A GONSALVES & SON	\$118,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12203	32	REPOWER 2 MAIN AND 2 AUXILIARY ENGINES ON A MARINE VESSEL	ISLAND CHARTERS, INC	\$235,958.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12204	32	REPOWER OF 13 OFF-ROAD VEHICLES	SHARMA GENERAL ENGINEERING CONTRACTORS	\$1,810,940.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12205	80	REPLACEMENT OF 2 OFF-ROAD VEHICLES	CITY OF ANAHEIM	\$38,458.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12210	36	RENEWABLE ENERGY PROJECT IN COMMUNITIES SURROUNDING ELECTRICAL GENERATING FACILITIES	CLEAN FUEL CONNECTION INC	\$22,642.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12211	32	REPOWER 1 MAIN AND 3 AUXILIARY ENGINES ON 1 MARINE VESSEL	SOUTHERN CALIFORNIA BAIT CO., INC.	\$444,050.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12212	32	REPOWER OF 6 MAIN ENGINES OF 5 MARINE VESSELS	CITY OF AVALON	\$279,485.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12213	32	REPOWER 8 MAIN ENGINES ON 6 MARINE VESSELS	SOUTHWEST MARINE RESOURCES, LLC	\$547,960.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12215	32	REPOWER OF 1 MAIN ENGINE AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	ERIC NORLIN	\$113,750.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12216	32	REPOWER 1 MAIN ENGINE AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	DEL MAR SPORTFISHING, INC.	\$187,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12218	32	REPOWER 2 MAIN ENGINES ON 1 MARINE VESSEL	GERLAR CORPORATION	\$152,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12219	32	REPOWER 1 MAIN ENGINE AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	JOHN HULJEV	\$132,150.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12220	32	REPOWER 2 MAIN ENGINES ON 1 MARINE VESSEL	ERNEST DARRYL BEARD II	\$113,055.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12221	32	REPOWER 2 MAIN ENGINES OF 1 MARINE VESSEL	HARLEY MARINE SERVICES INC	\$456,208.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12223	32	REPOWER 2 MAIN ENGINES OF 1 MARINE VESSEL	SEACRET CHARTERS LLC	\$72,850.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12226	32	REPOWER 4 MAIN AND 2 AUXILIARY ENGINES OF 2 MARINE VESSELS	SEAWAY COMPANY OF CATALINA	\$538,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12227	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	HA VAN PHAT	\$41,415.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12228	32	REPOWER 2 MAIN ENGINES ON ONE MARINE VESSEL	HONG VAN LE DBA CHERI	\$146,400.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12229	32	REPOWER 1 MAIN ENGINE & 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	KHANH QUANG BUI	\$141,600.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12237	32	REPOWER 3 OFF-ROAD VEHICLES	DAVID W. CLARK	\$333,240.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12241	32	REPOWER OF 1 MAIN ENGINE AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	FREELANCE SPORTFISHING, INC.	\$132,150.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12243	32	REPOWER OF 1 AUXILIARY ENGINE OF A MARINE VESSEL	PSALTY ADVENTURES	\$17,379.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12244	32	REPOWER 2 MAIN ENGINES ON 1 MARINE VESSEL	SUNDIVER INTERNATIONAL, INC.	\$177,240.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12245	32	REPOWER OF 2 MAIN AND 2 AUXILIARY ENGINES OF A MARINE VESSEL	LIBERTY ENTERPRISES, CA LLC	\$254,400.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12246	80	REPLACE 1 YARD TRUCK	BEL TRUCKING, INC.	\$71,776.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12247	32	REPOWER 1 ROUGH TERRAIN FORKLIFT	PAUL C. MILLER CONSTRUCTION CO., INC.	\$16,864.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12248	32	REPOWER 1 MAIN AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	MARINA DEL REY BAIT COMPANY, INC.	\$211,200.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12249	80	REPOWER 4 OFF-ROAD VEHICLES	MCMINN EQUIPMENT RENTAL & LEASING, INC.	\$724,309.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12251	32	REPOWER 1 MAIN ENGINE AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	THUNDERBIRD SPORTFISHING, INC.	\$137,750.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12252	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	BEANSTALK INC.	\$219,494.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12253	32	REPOWER OF 2 MAIN ENGINES OF A MARINE VESSEL	FIESTA HARBOR CRUISES INC.	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12254	32	REPOWER OF 1 MAIN ENGINE OF A MARINE VESSEL	KMR FISHING	\$108,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12255	32	REPOWER 1 MAIN AND 2 AUXILIARY ENGINES ON 1 MARINE VESSEL	SOUTH SOUND FISHERIES INC.	\$368,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12256	32	REPOWER 1 MAIN AND 2 AUXILIARY ENGINES ON 1 MARINE VESSEL	VITO TERZOLI	\$239,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12257	32	REPOWER OF 2 AUXILIARY ENGINES OF A MARINE VESSEL	FERRIGNO ENTERPRISES, INC.	\$96,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12258	32	REPOWER OF 2 MAIN ENGINES ON A MARINE VESSEL	PATRICK FEALY	\$142,840.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12261	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	S C J LLC	\$68,342.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12262	32	REPOWER 1 MAIN AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	R&R SPORTFISHING, INC.	\$106,895.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12263	32	REPOWER OF 1 MAIN ENGINE OF A MARINE VESSEL	MARK PODOLL	\$109,600.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12264	32	REPOWER OF 1 MAIN ENGINE AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	MATT WALSH, INC.	\$103,018.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12265	32	REPOWER OF 2 MAIN ENGINES OF A MARINE VESSEL	OCEAN INSTITUTE	\$144,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12266	32	REPOWER OF 2 MAIN AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	SAIGON WHOLESALE SEAFOOD	\$171,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12267	32	REPOWER OF 2 MAIN ENGINES AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	LEFTY'S FISHING COMPANY	\$238,600.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12268	32	REPOWER OF 1 MAIN ENGINE OF A MARINE VESSEL	MORE CARNAGE, LLC	\$156,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12269	32	REPOWER 2 MAIN AND 3 AUXILIARY ENGINES ON 2 MARINE VESSELS	HARBOR BREEZE CORP	\$557,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12271	32	REPOWER 2 AUXILIARY ENGINES OF 1 MARINE VESSEL	TRITON FISHING	\$130,700.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12274	32	REPOWER OF 1 MAIN ENGINE OF A MARINE VESSEL	VICTORY SPORTFISHING CO, INC.	\$124,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12276	32	REPOWER OF 1 MAIN ENGINE OF A MARINE VESSEL	JOSEPH L DOW, JR	\$113,600.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12277	59	ASSIST WITH AQMD'S CARL MOYER ON-ROAD HEAVY-DUTY VIP	TIAX LLC	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12278	32	REPOWER OF 1 MAIN AND 1 AUXILIARY ENGINE OF A MARINE VESSEL	TIEU NGUYEN	\$147,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12279	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	TRAVIS E VAUGHAN	\$91,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12280	32	REPOWER OF 2 MAIN AND 2 AUXILIARY ENGINES OF A MARINE VESSEL	SAN PEDRO PRIDE	\$374,400.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12281	81	TECHNICAL ASSISTANCE FOR PROPOSITION 1B GOODS MOVEMENT PROGRAM	TIAX LLC	\$300,000.00	
27	INFORMATION MANAGEMENT	C12285	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	CMC AMERICAS INC	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12287	80	RETROFIT ONE BOOM LIFT	DISNEYLAND RESORT	\$13,742.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12288	32	REPOWER ONE ROUGH TERRAIN FORKLIFT	WE RENT LLC	\$16,864.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12289	81	PURCHASE 5 CNG HEAVY-DUTY TRUCKS TO REPLACE 5 OLDER DIESEL MODELS	APEX BULK COMMODITIES, LLC.	\$500,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12293	81	PURCHASE ONE HEAVY-DUTY NATURAL GAS TRUCK TO REPLACE AN OLDER, DIESEL MODEL	SYSCO FOOD SERVICES OF LOS ANGELES INC	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12297	81	TECHNICAL ASSISTANCE WITH PROP 1B GOODS MOVEMENT PROGRAM	CLEAN FUEL CONNECTION INC	\$130,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12300	32	REPOWER 4 OFF-ROAD VEHICLES	EARTH TEK ENGINEERING CORP.	\$515,342.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12303	81	PURCHASE 9 CNG HEAVY DUTY TRUCKS TO REPLACE OLDER DIESEL MODELS - FUNDING FROM DOE GRANT	UNITED PARCEL SERVICE, INC	\$900,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12308	40	PERFORM WEBSITE SERVICES FOR THE CNGVP	GLADSTEIN, NEANDROSS & ASSOCIATES	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12309	31	TECHNICAL ASSISTANCE WITH LOW AND ZERO-EMISSION VEHICLES, FUEL CELLS AND FUELING INFRASTRUCTURE	TIAX LLC	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12310	32	REPOWER OF 1 MAIN ENGINE OF A MARINE VESSEL	DANA POINT TOWBOAT SERVICES	\$47,307.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12312	31	TECHNICAL ASSISTANCE WITH LOW AND ZERO-EMISSION TECHNOLOGY, GOODS MOVEMENT, ALTERNATIVE FUELS, TRANSIT APPLICATIONS AND FUELING INFRASTRUCTURE	WESTSTART-CALSTART	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12380	31	TECHNICAL ASSISTANCE RELATED TO EMISSIONS, ADVANCED TECHNOLOGIES AND GOODS MOVEMENT	THE TIOGA GROUP	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12381	31	TECHNICAL ASSISTANCE RELATED TO EMISSION INVENTORIES, GOODS MOVEMENT AND OFF-ROAD SOURCES	INTEGRA ENVIRONMENTAL CONSULTING, INC.	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12409	36	RENEWABLE ENERGY PROJECTS IN COMMUNITIES SURROUNDING ELECTRICAL GENERATING FACILITIES	ALTERNATIVE ENERGY CONNECTIONS	\$149,700.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12454	36	INSTALLATION OF UP TO 1MW OF FLYWHEEL ENERGY STORAGE TO PROVIDE REGENERATIVE BRAKING TO TRAINS	KINETIC TRACTION SYSTEMS, INC	\$2,473,469.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12506	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MIHAN TOUR INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12600	17	SCRAP GASOLINE LAWN MOWERS AFTER DRAINING THE FUEL SAFELY AT THE LAWN MOWER EXCHANGE SITES AND PROVIDE TRANSPORTATION FROM THE SITES	PARKING CONCEPTS INC	\$8,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12602	17	SUPPLY CORDLESS ELECTRIC LAWNMOWERS	THE GREENSTATION	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12603	01	CONSTRUCTION OF NEW MONITORING PLATFORM AT LOS ANGELES MAIN STREET AIR MONITORING SITE	LACY CONSTRUCTION	\$142,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12604	31	TECHNICAL ASSISTANCE WITH LOW- AND ZERO-EMISSION VEHICLES, TECHNOLOGY & EMISSIONS ANALYSIS	JOSEPH C CALHOUN PE INC	\$20,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12605	17	SCRAP GASOLINE LAWN MOWERS AFTER DRAINING THE FUEL SAFELY AT THE LAWN MOWER EXCHANGE SITES AND PROVIDE TRANSPORTATION FROM THE SITES.	DICK'S AUTO WRECKING	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12606	17	EXCHANGE 714 MODEL BR500 BACKPACK BLOWERS FOR USE BY COMMERCIAL GARDENERS/LANDSCAPERS	PACIFIC STIHL	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12607	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	LUIS ALBERTO VILLEGAS RAMIREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12610	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE LARA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12611	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MARIO VARELA-VAZQUEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12612	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JUAN PABLO BONILLA ALFARO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12613	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	WILDRES ARMIJO CARDOSA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12615	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE LUIS PARTIDA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12616	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MAURICIO MOREIRA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12618	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FRANCISCO J VILLANUEVA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12619	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JESSE R. PEREZ TRUCKING	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12620	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	TARSEM SOHAL	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12621	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	SALVADOR TABLAS CARDOZO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12622	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RAUL ESPARZA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12623	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RUBEN FLORES	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12625	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	NAHUM VIDAL	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12626	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	PATRICIA CARRANZA	\$30,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12627	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOEL OSWALDO GUZMAN	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12628	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FRANCISCO SOLARES	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12629	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JUAN MORENO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12632	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ADAN ALVARADO AGUILAR	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12633	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE C. ALVAREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12634	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JUAN CARLOS INIGUEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12635	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	CARLOS MUNOZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12636	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	BYRON AMILCAR GUTIERREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12678	32	SUPPLY UP TO 4000 CORDLESS ELECTRIC LAWN MOWERS	THE GREENSTATION	\$174,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12680	27	SCRAP GASOLINE LAWN MOWERS AFTER DRAINING THE FUEL SAFELY AT THE LAWN MOWER EXCHANGE SITES AND PROVIDE TRANSPORTATION FROM THE SITES	DICK'S AUTO WRECKING	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12681	27	PROVIDE SUPPORT SERVICES AT THE LAWN MOWER EXCHANGE EVENTS	PARKING CONCEPTS INC	\$32,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12702	01	LEGAL ADVICE FOR LAWSUITS AND ADMINISTRATIVE PROCEEDINGS	SHUTE MIHALY & WEINBERGER LLP	\$42,500.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12713	01	BOILERS AND ASSOCIATED EQUIPMENT REPLACEMENT	AUTOMATIC BOILER COMPANY	\$342,950.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12714	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FRANCISCO VELASQUEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12715	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE A. PAYAN	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12716	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JASWANT S. DHILLON (TRUCKING) - BIR/W9	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12717	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE ALFARO BONILLA	\$30,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12720	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JULIO MENERA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12723	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JULIAN VALENZUELA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12724	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MELENDEZ TRUCKING	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12726	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ISAAC MARTINEZ	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12727	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DAGOBERTO ALVARENGA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12728	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FELIPE FRAUSTO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12729	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	EDUARDO M RUIZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12730	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RICARDO PEDRAZA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12732	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE LUIS FLORES	\$30,000.00	
27	INFORMATION MANAGEMENT	C12734	01	WEB REDESIGN AND CONTENT MANAGEMENT SYSTEM	CIVIC RESOURCE GROUP LLC	\$384,409.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12736	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MIGUEL ALVAREZ GONZALEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12737	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MARCO A. FLORES NIETO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12738	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JESUS HUERTA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12739	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ALFONSO RODRIGUEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12740	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	IRMA QUINTANILLA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12741	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ERIC R CONTRERAS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12742	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	VICTOR MANUEL CENDEJAS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12743	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ISRAEL GRANADOS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12745	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ASael SALAS	\$30,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12746	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	NICHOLAS CERVANTES	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12747	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE NAMBO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12748	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JAVIER NAVA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12749	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JULIO ALBINO CONTRERAS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12751	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	LOMBARDO RAMOS PEREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12752	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE ANGEL CHACON	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12753	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JAMES APPEL TRUCKING	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12755	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FELIPE RAMIREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12756	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	GRAYLON WHITE	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12757	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FRANK HIDALGO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12759	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ELMER BORJAS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12760	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	VIRGILIO GONZALES	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12761	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ARTURO GOMEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12762	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE G. FUNES	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12763	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	OSCAR SALCEDO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12764	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JACINTO AVILA MARTINEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12766	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	LUIS ARTURO ORTIZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12767	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	WILLIAM RAYMOND FROMDAHL	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12768	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE GOMEZ	\$30,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12769	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	SANTOS SOTERO LAINEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12770	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	BENJAMIN LOPEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12771	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RAUL ISAAC PEREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12772	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	GURBAX SINGH MANDAIR	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12773	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ESLY TRUJILLO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12774	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FLORIDALMA MONROY	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12775	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	SALVADOR SANTIAGO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12776	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE B. CRUZ-BONIILLA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12777	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RICARDO RIVERA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12778	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ADELMO GARCIA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12779	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	NEW CENTURY INTERMODAL INC.	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12780	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE L. OSUNA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12781	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MANUEL DE JESUS ALFARO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12782	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	PEDRO LOPEZ TRUCKING	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12783	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JUAN CASTILLO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12784	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	LEANDRO VAQUERANO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12785	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DAVID GARCIA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12786	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JUAN RAMIREZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12787	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ARNULFO FLORES	\$30,000.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12788	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MAGDALENO F. SANTANA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12789	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MANUEL ANTONIO GONZALEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12790	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	PRIMITIVO SALCEDO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12791	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RICARDO ULISES CRUZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12792	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JORGE LUIS AVILA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12793	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	VALENTE CORTEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12794	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	HUGO ELIAS GRANADOS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12795	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	OSIEL MORA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12796	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	STEVEN CORREA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12797	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	EVER CLEMENTINO PIVARAL	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12798	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RAMIRO ORTIZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12799	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOHNNY CASTRO	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12800	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	JOSE A. TICAS	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12801	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	RAMON ERNESTO ARRUA	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12802	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	CHRISTIAN VILICANA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12803	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ALEX ANTONIO CEA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12826	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	MOISES LARA	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12827	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	SALVADOR VILLANUEVA	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12828	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DAY-N-NITE TRANS INC.	\$30,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12829	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	EDGARDO U. PINEDA-GONZALEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12830	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	CHRISTOPHER MARK HALTUCH	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12831	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DOMINGO MUNIZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12832	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	ROUTE ONE TRANSPORT, INC.	\$540,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12833	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	FERNANDO MENDEZ	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12834	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DANIEL VIDAL	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12835	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DOMITILLO GARCIA	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12837	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	INTERMODAL EXPRESS INC.	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12838	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	DEMENNO KERDOON	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12839	81	PROP 1B TRUCK REPLACEMENT PROGRAM - DRAYAGE	HERMAN RIVERA ACOSTA	\$30,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12841	01	DEVELOPMENT OF A NEW ANNUAL EMISSIONS REPORTING SYSTEM	ECOTEK INC	\$199,820.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12880	01	SUBSURFACE GEOTECHNICAL INVESTIGATION	COTTON, SHIRES AND ASSOCIATES, INC.	\$107,985.00	
26	PLANNING RULE DEV & AREA SOURCES	C12881	01	CEQA CONSULTANT ASSISTANT	ENVIRONMENTAL AUDIT INC	\$113,020.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09219	82	PROP 1B LOWER-EMISSION SCHOOL BUS RETROFIT PROGRAM	AEROCOACH TRANSPORTATION, LLC	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09220	82	PROP 1B LOWER-EMISSION SCHOOL BUS RETROFIT PROGRAM	ALLIANCE BUS LINES, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09223	82	PURCHASE AND INSTALL 20 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	CERTIFIED TRANSPORTATION SERVICES INC	\$400,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09228	82	PURCHASE AND INSTALL 24 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	DURHAM SCHOOL SERVICES	\$312,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09242	82	PROP 1B LOWER-EMISSION SCHOOL BUS RETROFIT PROGRAM	RICHMOND TRANSPORTATION LLC	\$20,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11569	80	PURCHASE 1 CNG SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	BONITA UNIFIED SCHOOL DISTRICT	\$169,524.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11572	80,33	PURCHASE 13 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	GARDEN GROVE UNIFIED SCHOOL DISTRICT	\$2,203,812.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11573	80	PURCHASE 4 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	ORANGE UNIFIED SCHOOL DISTRICT	\$678,096.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11574	80	PURCHASE 1 CNG SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	BANNING UNIFIED SCHOOL DISTRICT	\$169,524.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11575	80,33	PURCHASE 8 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	DESERT SANDS UNIFIED SCHOOL DISTRICT	\$1,356,192.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11576	80	LOWER-EMISSION TWO-STROKE SCHOOL BUS REPLACEMENT PROGRAM	HEMET UNIFIED SCHOOL DISTRICT	\$339,048.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11577	80,33	PURCHASE 8 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	TEMECULA VALLEY UNIFIED SCHOOL DISTRICT	\$1,356,192.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11578	80,33	PURCHASE 7 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	CHINO VALLEY UNIFIED SCHOOL DISTRICT	\$1,186,668.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11579	80	PURCHASE 4 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	RIALTO UNIFIED SCHOOL DISTRICT	\$678,096.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12059	82	PURCHASE AND INSTALL 5 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	ALHAMBRA UNIFIED SCHOOL DISTRICT	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12060	82	PURCHASE AND INSTALL 5 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	CASTAIC UNION SCHOOL DISTRICT	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12061	82	PURCHASE AND INSTALL ONE PM TRAP ON A SCHOOL BUS	EL MONTE UNION HIGH SCHOOL DISTRICT	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12062	82	PURCHASE AND INSTALL 9 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	HEMET UNIFIED SCHOOL DISTRICT	\$180,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12063	82	PURCHASE AND INSTALL 2 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	ROWLAND UNIFIED SCHOOL DISTRICT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12064	82	PURCHASE AND INSTALL 7 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED MAINTENANCE	LYNWOOD UNIFIED SCHOOL DISTRICT	\$140,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12065	82	PURCHASE AND INSTALL 3 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED MAINTENANCE	MAGNOLIA SCHOOL DISTRICT	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12066	82	PURCHASE AND INSTALL 2 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	NUVIEW UNION SCHOOL DISTRICT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12067	82	PURCHASE AND INSTALL 2 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	ONTARIO-MONTCLAIR SCHOOL DISTRICT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12068	82	PURCHASE AND INSTALL 2 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	RIALTO UNIFIED SCHOOL DISTRICT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12069	82	PURCHASE AND INSTALL 4 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED MAINTENANCE	JFK TRANSPORTATION CO., INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12070	82	PURCHASE AND INSTALL 8 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED TRAP MAINTENANCE	TOBINWORLD	\$160,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12071	82	PURCHASE AND INSTALL 10 PM TRAPS ON SCHOOL BUSES WITH ASSOCIATED TRAP MAINTENANCE	TOWN RIDE, INC.	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12137	82,80	PROP 1B LOWER EMISSION SCHOOL BUS REPLACEMENT PROGRAM	LOS ANGELES UNIFIED SCHOOL DISTRICT	\$2,418,984.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12138	82,80	PROP 1B LOWER-EMISSION SCHOOL BUS REPLACEMENT PROGRAM	ROWLAND UNIFIED SCHOOL DISTRICT	\$1,017,144.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12139	82,80	PROPOSITION 1B LOWER-EMISSION SCHOOL BUS REPLACEMENT PROGRAM	WALNUT VALLEY UNIFIED SCHOOL DISTRICT	\$847,620.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12140	82,80	PURCHASE FIVE CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	LOS ALAMITOS UNIFIED SCHOOL DISTRICT	\$847,620.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12141	82,80	PURCHASE 2 CNG SCHOOL BUSES WITH ASSOCIATED FIRE SUPPRESSANT SYSTEMS AND ASSOCIATED INFRASTRUCTURE	RIM OF THE WORLD UNIFIED SCHOOL DISTRICT	\$339,048.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12142	82,80	PURCHASE ONE CNG SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	BEAR VALLEY UNIFIED SCHOOL DISTRICT	\$169,524.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12143	82	PURCHASE 1 CNG SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	ALHAMBRA UNIFIED SCHOOL DISTRICT	\$169,524.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12144	82,80	PURCHASE ONE CNG SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	CASTAIC UNION SCHOOL DISTRICT	\$134,524.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12145	82,80	PURCHASE 9 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	GARDEN GROVE UNIFIED SCHOOL DISTRICT	\$1,525,716.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12146	82,80	PURCHASE 1 CNG SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	MONTEBELLO UNIFIED SCHOOL DISTRICT	\$169,524.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12147	82,80	PURCHASE 7 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	BREA-OLINDA HIGH SCHOOL	\$1,186,668.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12168	36	PURCHASE AND INSTALL 2 PM TRAPS ON BACK-UP GENERATORS	COUNTY OF ORANGE	\$70,000.00	
44	MSRC	ML11007	23	REGIONAL PM10 STREET SWEEPING PROGRAM	COACHELLA VALLEY ASSOC OF GOVERNMENTS	\$250,000.00	
44	MSRC	ML11021	23	PURCHASE 7 HEAVY-DUTY CNG VEHICLES	CITY OF WHITTIER	\$210,000.00	
44	MSRC	ML11022	23	PURCHASE 5 HEAVY-DUTY NATURAL GAS VEHICLES AND INSTALL CNG STATION	CITY OF ANAHEIM	\$175,000.00	
44	MSRC	ML11023	23	PURCHASE 2 HEAVY-DUTY CNG VEHICLES AND EXPAND EXISTING CNG FUELING STATION	CITY OF RANCHO CUCAMONGA	\$260,000.00	
44	MSRC	ML11026	23	PURCHASE 3 HEAVY-DUTY LNG REFUSE TRUCKS	CITY OF REDLANDS	\$90,000.00	
44	MSRC	ML11027	23	MODIFY VEHICLE MAINTENANCE FACILITY	CITY OF LOS ANGELES	\$300,000.00	
44	MSRC	ML11028	23	PURCHASE 10 HEAVY-DUTY CNG VEHICLES	CITY OF GLENDALE	\$300,000.00	

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44	MSRC	ML11030	23	PURCHASE 2 LPG HEAVY-DUTY VEHICLES AND RETROFIT 7 HEAVY-DUTY DIESEL VEHICLES	CITY OF FULLERTON	\$109,200.00	
44	MSRC	ML11031	23	PURCHASE 10 HEAVY-DUTY CNG VEHICLES	CITY OF CULVER CITY	\$300,000.00	
44	MSRC	ML11032	23	PURCHASE VEHICLE, EXPAND STATIONS, AND UPGRADE MAINTENANCE FACILITY	CITY OF GARDENA	\$102,500.00	
44	MSRC	ML11033	23	PURCHASE 36 HEAVY-DUTY LNG VEHICLES	CITY OF LOS ANGELES	\$1,080,000.00	
44	MSRC	ML11034	23	PURCHASE 21 HEAVY-DUTY CNG VEHICLES	CITY OF LOS ANGELES	\$630,000.00	
44	MSRC	ML11035	23	RETROFIT 3 HEAVY-DUTY ON-ROAD VEHICLES	CITY OF LA QUINTA	\$25,368.00	
44	MSRC	ML11036	23	PURCHASE 9 HEAVY-DUTY NATURAL GAS VEHICLES AND INSTALL CNG STATION	CITY OF RIVERSIDE	\$670,000.00	
44	MSRC	ML11038	23	MAINTENANCE FACILITY MODIFICATIONS	CITY OF SANTA MONICA	\$400,000.00	
44	MSRC	ML11039	23	PURCHASE 6 HEAVY-DUTY CNG VEHICLES	CITY OF ONTARIO	\$180,000.00	
44	MSRC	ML11040	23	PURCHASE 1 HEAVY-DUTY CNG VEHICLE	CITY OF SOUTH PASADENA	\$30,000.00	
44	MSRC	ML11042	23	PURCHASE 1 CNG SWEEPER AND REPOWER 1 HEAVY-DUTY DIESEL VEHICLE	CITY OF CHINO	\$35,077.00	
44	MSRC	ML11043	23	PURCHASE 2 HEAVY-DUTY CNG VEHICLES	CITY OF HEMET	\$60,000.00	
44	MSRC	ML11044	23	EXPAND EXISTING CNG FUELING STATION	CITY OF ONTARIO	\$400,000.00	
44	MSRC	ML11045	23	PURCHASE 1 HEAVY-DUTY CNG VEHICLE	CITY OF NEWPORT BEACH	\$30,000.00	
44	MSRC	MS10003	23	PURCHASE 1 VACUUM TRUCK EQUIPPED WITH AN ADVANCED NATURAL GAS ENGINE	CITY OF SIERRA MADRE	\$13,555.00	
44	MSRC	MS10004	23	PURCHASE 3 HEAVY-DUTY TRUCKS WITH ADVANCED NATURAL GAS ENGINES	LINDE LLC	\$56,932.00	
44	MSRC	MS10007	23	PURCHASE 2 SHUTTLE BUSES EQUIPPED WITH ADVANCED NATURAL GAS ENGINES	ENTERPRISE RENT A CAR	\$18,976.00	
44	MSRC	MS10011	23	PURCHASE 12 CNG TRANSIT BUSES	FOOTHILL TRANSIT AGENCY	\$113,865.00	
44	MSRC	MS10012	23	PURCHASE 9 ELECTRIC-DRIVE TRANSIT BUSES	FOOTHILL TRANSIT AGENCY	\$85,392.00	
44	MSRC	MS10017	23	PURCHASE 19 TRUCKS EQUIPPED WITH ADVANCED NATURAL GAS ENGINES	RYDER TRUCK RENTAL, INC.	\$651,377.00	
44	MSRC	MS10024	23	PURCHASE 5 TRUCKS WITH ALL-ELECTRIC DRIVE SYSTEMS	FRITO-LAY NORTH AMERICA	\$47,444.00	

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44	MSRC	MS11002	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$300,000.00	
44	MSRC	MS11003	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	BUSWEST, LLC	\$300,000.00	
44	MSRC	MS11004	23	IMPLEMENT CLEAN FUEL TRANSIT SERVICE TO DODGER STADIUM	LOS ANGELES COUNTY METROPOLITAN	\$450,000.00	
44	MSRC	MS11006	23	IMPLEMENT SPECIAL METROLINK SERVICE TO ANGEL STADIUM	ORANGE CO TRANSPORTATION AUTHORITY	\$268,207.00	
44	MSRC	MS11010	23	CONSTRUCT LNG FUELING STATION	BORDER VALLEY TRADING	\$150,000.00	
44	MSRC	MS11011	23	CONSTRUCT A CNG FUELING STATION	EDCO DISPOSAL CORPORATION	\$100,000.00	
44	MSRC	MS11012	23	CONSTRUCT A CNG FUELING STATION IN BUENA PARK	EDCO DISPOSAL CORPORATION	\$100,000.00	
44	MSRC	MS11017	23	EXPANSION OF EXISTING CNG FUELING STATION	CR&R INC	\$100,000.00	
44	MSRC	MS11018	23	IMPLEMENT EXPRESS BUS SERVICE TO ORANGE COUNTY FAIR	ORANGE CO TRANSPORTATION AUTHORITY	\$211,360.00	
44	MSRC	MS11055	23	REPOWER 5 HEAVY-DUTY OFF-ROAD VEHICLES	KEC ENGINEERING	\$250,000.00	
44	MSRC	MS11056	23	PROGRAMMATIC OUTREACH SERVICES	THE BETTER WORLD GROUP, INC	\$98,418.00	
44	MSRC	MS11061	23	DEMONSTRATE RETROFIT DEVICE ON OFF-ROAD VEHICLE	EASTERN MUNICIPAL WATER DISTRICT	\$11,659.00	
44	MSRC	MS11067	23	EXPAND LCNG AND LNG FUELING STATION	CITY OF REDLANDS	\$85,000.00	
44	MSRC	MS11074	23	IMPLEMENT SPECIAL TRANSIT SERVICE TO INDIO	SUNLINE TRANSIT AGENCY	\$41,849.00	
44	MSRC	MS11076	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES	SA RECYCLING LLC	\$424,801.00	
44	MSRC	MS11080	23	IMPLEMENT SPECIAL METROLINK SERVICE TO AUTO CLUB SPEEDWAY	SO CALIFORNIA REGIONAL RAIL AUTHORITY	\$26,000.00	
<b>Subtotal</b>						<b>\$77,700,939.00</b>	

Competitive-Executive Officer Approved

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12023	01	CONDUCT SURFACE METEOROLOGICAL NETWORK PERFORMANCE AND SYSTEM EVALUATIONS PROGRAMS	SONOMA TECHNOLOGY INC	\$44,332.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12026	01	CONDUCT UPPER AIR NETWORK PERFORMANCE AND SYSTEM EVALUATION PROGRAM	TECHNICAL AND BUSINESS SYSTEMS	\$49,205.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12169	01	CAFETERIA REFRIGERATION EQUIPMENT REPLACEMENT	KLM, INC	\$45,850.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12189	01	SERVICE AND MAINTENANCE FOR LEIBERT AIR CONDITIONING EQUIPMENT	KLM, INC	\$8,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12193	01	HEARING BOARD ROOM AUDIENCE SEATING REPLACEMENT	AMERICAN SEATING CO	\$22,125.00	
04	FINANCE	C12217	01	PROVIDE INVESTMENT CONSULTING SERVICES 2012-14	PFM ASSET MANAGEMENT LLC	\$60,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12897	01	TECHNICAL SUPPORT FOR AQMD MEASUREMENTS IN THE COACHELLA VALLEY	TECHNICAL AND BUSINESS SYSTEMS	\$60,000.00	
<b>Subtotal</b>						<b>\$289,512.00</b>	

**Sole Source - Board Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10714	31	DEVELOP FUEL CELL-GAS TURBINE HYBRID SYSTEM FOR ON-BOARD LOCOMOTIVE APPLICATIONS	UNIVERSITY OF CALIFORNIA-IRVINE	\$78,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10723	31	RETROFIT A DIGESTER GAS ENGINE WITH NOX AFTERTREATMENT EMISSION CONTROL TECHNOLOGY	EASTERN MUNICIPAL WATER DISTRICT	\$85,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C11527	31	SOURCES, COMPOSITION, VARIABILITY & TOXICOLOGICAL CHARACTERISTICS OF ULTRAFINE PARTICLES IN SOUTHERN CALIFORNIA STUDY	UNIVERSITY OF SOUTHERN CALIFORNIA	\$470,969.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11581	17	PURCHASE UP TO 401 UNITS OF MODEL CM1936/CM1200/SPCM1936 CORDLESS ELECTRIC LAWN MOWERS	BLACK & DECKER (US) INC	\$90,000.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11606	31	DEVELOP AND DEMONSTRATE PLUG-IN HYBRID ELECTRIC DRIVE SYSTEMS FOR MEDIUM- AND HEAVY-DUTY VEHICLES	ODYNE SYSTEMS, LLC	\$494,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11608	44	DEMONSTRATION OF REMOTE SENSING FENCELINE MONITORING METHODS AT OIL REFINERIES AND PORTS	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$300,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11609	56	HEROS II PROGRAM AND AB 118 ENHANCED FLEET MODERNIZATION PROGRAM	FOUNDATION FOR CALIF COMMUNITY COLLEGES	\$668,400.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11614	17	DEMONSTRATE BATTERY ELECTRIC HEAVY-DUTY TRUCKS	TRANSPORTATION POWER, INC.	\$496,505.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11656	31	PARTICIPATE IN CaFCP FOR CALENDAR YEAR 2011 AND PROVIDE SUPPORT FOR REGIONAL COORDINATOR	BEVILACQUA-KNIGHT INC	\$137,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12024	31	INSTALL ELECTRIC CHARGING INFRASTRUCTURE	ELECTRIC TRANSPORTATION ENGINEERING CORP	\$70,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12025	32	REPLACE 25 OLDER DIESEL TRUCKS WITH 2010 MODEL YEAR COMPLIANT TRUCKS	ACE BEVERAGE CO.	\$1,500,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12028	31	DEMONSTRATION & REPLACEMENT OF UPS DIESEL DELIVERY TRUCKS WITH ZERO-EMISSION MED-DUTY TRUCKS	ELECTRIC VEHICLES INTERNATIONAL	\$1,400,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12072	53	PROGRAM AND TECHNICAL ASSISTANCE FOR CLEAN AIR FAIRS FOR SENIORS	THREE SQUARES INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12104	31	DEVELOPMENT, INITIATION & IMPLEMENTATION OF A CLEAN VEHICLE OUTREACH PROJECT	THREE SQUARES INC.	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12109	27	INSTALLATION & DEMONSTRATION OF COMBINED DPF & SCR TECHNOLOGY ON A MARINE VESSEL	HUG ENGINEERING, INC	\$396,580.00	
08	LEGAL	C12126	01	LEGAL RESEARCH AND PUBLIC RECORD LIBRARIES	LEXIS-NEXIS	\$62,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12136	53	ASSIST IN IDENTIFYING AND SECURING SPEAKERS FOR AQMD'S SERIES OF SENIOR CLEAN AIR FAIRS	THE BETTER WORLD GROUP, INC	\$10,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12149	31	COSPONSOR DEMOS OF NOx AND PM EMSSIONS CONTROL TECH ON DIESEL-POWERED CONSTRUCTION EQUIPMENT	DIESEL EMISSION TECHNOLOGIES, LLC	\$60,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12150	31	COSPONSOR DEMOS OF NOX AND PM EMISSIONS CONTROL TECHNOLOGIES ON DIESEL-POWERED CONSTRUCTION EQUIPMENT	PURITECH GMBH & CO., KG	\$72,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12154	31	IDENTIFY CELLULOSIC BIOFUEL FEEDSTOCKS & CONDUCT BIODIESEL & ETHANOL HEALTH EFFECTS STUDIES	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$235,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12174	48	CHARACTERIZATION OF THE PHYSICAL, CHEMICAL, AND BIOLOGICAL PROPERTIES OF PM EMISSIONS, VOCS AND CARBONYL GROUPS FROM UNDER-FIRED CHARBROILERS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12195	17	CONDUCT A PILOT STUDY TO PROVIDE ZERO EMISSION LAWN AND GARDEN EQUIPMENT AND TRAIN RESIDENTS	THE GREENSTATION	\$17,525.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12197	31	HEALTH EFFECTS OF PM PARTICLES EMITTED FROM HEAVY-DUTY VEHICLES--A COMPARISON BETWEEN DIFFERENT BIODIESEL FUELS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$207,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12202	60	CREATION OF A BAY AREA PEV INFRASTRUCTURE REGIONAL PLAN	BAY AREA AIR QUALITY MANAGEMENT DISTRICT	\$300,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12207	01	LOW TOXICITY ALTERNATIVES FOR MOLD CLEANERS AND MOLD RELEASE AGENTS	INSTITUTE FOR RESEARCH & TECHNICAL	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12208	31	DETERMINE THE PHYSICAL AND CHEMICAL COMPOSITION & ASSOCIATED HEALTH EFFECTS OF TAILPIPE PM EMISSIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$175,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12214	31	DEVELOPMENT, INITIATION & IMPLEMENTATION OF A CLEAN VEHICLE OUTREACH PROJECT	WESTSTART-CALSTART	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12231	60	CREATION OF THE SOUTH COAST PEV INFRASTRUCTURE REGIONAL PLAN AND PROVIDE FUNDING TO SCCCC FOR OUTREACH	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$300,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12232	60	CREATION OF SOUTH COAST PEV INFRASTRUCTURE REGIONAL PLAN	CENTRAL COAST CLEAN CITIES COALITION	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12235	60	CREATION OF SACRAMENTO PEV INFRASTRUCTURE REGIONAL PLAN	SACRAMENTO AREA COUNCIL OF GOVERNMENTS	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12236	60	CREATION OF SAN DIEGO PEV INFRASTRUCTURE REGIONAL PLAN	CALIFORNIA CENTER FOR SUSTAINABLE ENERGY	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12259	31	DEMONSTRATE NATURAL GAS-POWERED POLICE VEHICLE	A-1 ALTERNATIVE FUEL SYSTEMS	\$65,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12273	31	CONSTRUCT NEW LNG FUELING STATION IN PALM SPRINGS	BORDER VALLEY TRADING	\$251,865.00	
26	PLANNING RULE DEV & AREA SOURCES	C12282	17	MOA FOR TARGET EPA AIR SHED PROGRAM	CITY OF SAN BERNARDINO	\$0.00	1
08	LEGAL	C12311	01	PROVIDE EXPERT TECHNICAL CONSULTING SERVICES IN SUPPORT OF PENDING ENFORCEMENT LITIGATION	ROBERT CARSON	\$7,000.00	
27	INFORMATION MANAGEMENT	C12355	01	HEARING BOARD AUDIO VISUAL REPLACEMENT	INTEGRATED MEDIA SYSTEMS	\$114,086.14	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12379	27	DEMONSTRATION OF ADVANCED CORDLESS ZERO-EMISSION COMMERCIAL LAWN AND GARDEN EQUIPMENT	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12386	31	DEMONSTRATE NATURAL GAS POWERED POLICE VEHICLES	AGILITY FUEL SYSTEMS	\$54,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12865	31	DEVELOPMENT OF QUANTITATIVE CELLULAR ASSAYS FOR USE IN UNDERSTANDING THE CHEMICAL BASIS OF AIR POLLUTANT TOXICITY	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$368,457.00	
44	MSRC	MS11078	23	PROVIDE TECHNICAL ADVISOR SERVICES TO THE MSRC	RAYMOND GORSKI	\$294,810.00	
<b>Subtotal</b>						<b>\$9,611,497.14</b>	

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<b>Sole Source - Executive Officer Approved</b>							
08	LEGAL	C12073	01	LEGAL COUNSEL	WILMER CUTLER PICKERING HALE & DORR LLP	\$15,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12080	01	SUPER COMPLIANT COATINGS FOR SAN BERNARDINO BEAUTIFICATION	CITY OF SAN BERNARDINO	\$3,000.00	
10	LEGAL	C12111	01	OSHA LAW/COUNSEL	WALTER & PRINCE LLP	\$25,000.00	
10	LEGAL	C12128	01	EMPLOYMENT & LABOR LAW	FISHER & PHILLIPS, LLP	\$50,000.00	
08	LEGAL	C12129	01	PROVIDE EMPLOYMENT AND LABOR LAW ADVICE AND REPRESENTATION	JACKSON LEWIS, LLP	\$50,000.00	
27	INFORMATION MANAGEMENT	C12163	01	GENERATE EXPANDED DEMOGRAPHIC ATTRIBUTES FROM AQMD'S CONTACTS DATABASE	CHMB CONSULTING FIRM	\$20,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12184	01	EMPLOYMENT/LABOR SERVICES	GARY P HEISS	\$10,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12185	01	MAPPING AND DATA EXTRACTION FOR VARIOUS GEOGRAPHY IN PREPARATION OF THE 2012 AQMP	MICHAEL REIBEL, PHD	\$5,950.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12284	01	SPANISH LANGUAGE SUPPORT FOR THE IPHONE/IPAD DEVELOPMENT	ZENITHECH LLC	\$32,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12296	01	PROVIDE SOCIOECONOMIC CONSULTING SERVICES	REGIONAL ECONOMIC MODELS INC	\$10,000.00	
03	EXECUTIVE OFFICE	C12302	01	STATE BUDGETARY AND FUNDING ISSUES CONSULTING SERVICES	CREEKSIDE CONSULTING SERVICES	\$73,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12377	01	TECHNICAL SUPPORT FOR 2012 AQMP MODELING AND ATTAINMENT DEMONSTRATION	HYUN CHEOL KIM	\$10,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C12378	01	TECHNICAL SUPPORT FOR 2012 AQMP MODELING AND ATTAINMENT DEMONSTRATION	SATORU MITSUTOMI	\$10,000.00	
08	LEGAL	XC12250	01	PROVIDE RAILROAD LITIGATION SERVICES	LIGHTFOOT STEINGARD & SADOWSKY, LLP	\$75,000.00	
<b>Subtotal</b>						<b>\$388,950.00</b>	

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<b>II. OTHER</b>							
<b>Board Assistant</b>							
<b>Board Administrative Committee Reviewed/Executive Officer Approved</b>							
02	GOVERNING BOARD	C12000	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR SHAWN NELSON	DENIS ROBERT BILODEAU	\$30,000.00	
02	GOVERNING BOARD	C12001	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JAN PERRY	EVA KANDARPA BEHREND	\$8,000.00	
02	GOVERNING BOARD	C12002	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JON BENOIT	BUFORD A CRITES	\$37,707.00	
02	GOVERNING BOARD	C12003	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JOSIE GONZALEZ	COUNTY OF SAN BERNARDINO	\$37,707.00	
02	GOVERNING BOARD	C12004	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR MICHAEL CACCIOTTI	ALLIS ANN DRUFFEL	\$6,799.00	
02	GOVERNING BOARD	C12005	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR MICHAEL CACCIOTTI	JAMES GLEN DUNCAN	\$12,124.00	
02	GOVERNING BOARD	C12006	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR WILLIAM BURKE	SARAH EWELL	\$113,121.00	
02	GOVERNING BOARD	C12007	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR RONALD LOVERIDGE	VIRGINIA L FIELD	\$37,707.00	
02	GOVERNING BOARD	C12008	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR MICHAEL CACCIOTTI	WILLIAM GLAZIER	\$6,657.00	
02	GOVERNING BOARD	C12009	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JAN PERRY	JCK CONSULTING INC	\$29,707.00	
02	GOVERNING BOARD	C12010	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR RONALD LOVERIDGE	MAUREEN K KANE & ASSOCIATES INC	\$37,707.00	
02	GOVERNING BOARD	C12011	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR MICHAEL CACCIOTTI	RONALD KETCHAM	\$12,124.00	
02	GOVERNING BOARD	C12012	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JOSEPH LYOU	NICOLE NISHIMURA	\$37,707.00	
02	GOVERNING BOARD	C12013	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JUDITH MITCHELL	MARISA KRISTINE PEREZ	\$37,707.00	
02	GOVERNING BOARD	C12014	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR MIGUEL PULIDO	LUIS A PULIDO	\$37,707.00	
02	GOVERNING BOARD	C12015	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR MICHAEL ANTONOVICH	DEBRA S MENDELSON	\$37,707.00	

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DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
02	GOVERNING BOARD	C12016	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR DENNIS YATES	ROBERT ULLOA	\$37,707.00	
02	GOVERNING BOARD	C12209	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR JOSEPH LYOU	MARK ABRAMOWITZ	\$18,060.00	
02	GOVERNING BOARD	C12898	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR CLARK PARKER	TRISTIE A. MILLER	\$7,500.00	
02	GOVERNING BOARD	XC12017	01	BOARD DISCRETIONARY FUNDS CONTRACT FOR DENNIS YATES	EARL C ELROD	\$37,707.00	
<b>Subtotal</b>						<b>\$621,162.00</b>	
<b>Other - Executive Officer Approved</b>							
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11725	01	LEASE OF 3 NISSAN LEAF VEHICLE	PUENTE HILLS NISSAN	\$60,221.53	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12049	01	AIR MONITORING STATION MECCA ELEM	COACHELLA VALLEY UNIFIED SCHOOL DISTRICT	\$0.00	9
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12105		MOA RE: INSTALLATION & MAINTENANCE OF AIR FILTRATION SYSTEMS	MOTHERS OF EAST LOS ANGELES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12112		MOA RE: INSTALLATION & MAINTENANCE OF AIR FILTRATION SYSTEMS	CENTER FOR COMMUNITY ACTION &	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12177	01	RUBIDOUX AIR MONITORING STATION - FUNDS FOR 2011	SOUTHERN CALIFORNIA EDISON	\$9,105.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12299	01	AIR MONITORING STATION LEASE	CITY OF REDLANDS	\$4,800.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12384	01	LAX AIR MONITORING STATIONS	CITY OF LOS ANGELES	\$42,601.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12485	01	CO-SPONSOR CSULB CEERS STUDENT EDUCATIONAL PROJECT 2012	CALIFORNIA STATE UNIVERSITY-LONG BEACH	\$28,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C12840	01	AIR MONITORING STATION	VILLAGES AT CABRILLO	\$10,800.00	
<b>Subtotal</b>						<b>\$155,527.53</b>	

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DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
<b>III. SPONSORSHIPS</b>							
<b>Sponsorship -Executive Officer Approved</b>							
35	LEGISLATIVE & PUBLIC AFFAIRS	C12039	01	EVENT SPONSORSHIP	AMERICAN LUNG ASSOC - INLAND COUNTIES	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12040	01	EVENT SPONSORSHIP	REGALETTES, INC.	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12106	01	PLATINUM MEMBERSHIP RENEWAL	CALIFORNIA HYDROGEN BUSINESS COUNCIL	\$20,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12283	01	SPONSOR AIR QUALITY ELEMENT JUNIOR TENNIS AMMBASSADORS PROGRAM	JUNIOR TENNIS AMBASSADORS	\$15,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12301	01	CO-SPONSOR THE ACT EXPO 2012	GLADSTEIN, NEANDROSS & ASSOCIATES	\$50,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12304	01	2012 REDLANDS BICYCLE CLASSIC	REDLANDS BICYCLE CLASSIC, INC.	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12305	01	27TH ANNUAL SAN BERNARDINO CITY-COUNTY CONFERENCE	SAN BERNARDINO ASSOCIATED GOVERNMENTS	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12383	01	SCAG REGIONAL CONFERENCE AND GENERAL ASSEMBLY	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$7,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12387	01	CICLAVIA "TRANSFORM LOS ANGELES"	CICLAVIA	\$1,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12388	01	CO-SPONSOR THE EVS-26: THE 26TH INTERNATIONAL ELECTRIC VEHICLE SYMPOSIUM-GREAT MINDS THINK ELETRIC	ELECTRIC DRIVE TRANSPORTATION	\$50,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12863	01	CO-SPONSOR THE CITY OF SANTA ANA'S 6TH ANNUAL HEALTH AND FITNESS FAIR	CITY OF SANTA ANA	\$2,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12864	01	COSPONSOR INLAND VALLEY CLEAN AIR SUMMIT	CENTER FOR COMMUNITY ACTION &	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C12879	01	STEM CAREER & COLLEGE WORKSHOP & CONFERENCE	OMEGA PSI PHI FRATERNITY, INC.	\$1,500.00	
<b>Subtotal</b>						<b>\$183,500.00</b>	

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<b>IV. MODIFICATIONS</b>							
<b>Board Approved</b>							
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07339	01	DEVELOPMENT OF AQ DATA MANAGEMENT SOFTWARE FOR THE PAMS PROGRAM	SONOMA TECHNOLOGY INC	\$60,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08246	31	SHOWCASE - DEMO OF NOx & PM EMISSIONS CONTROL TECH ON DIESEL-POWERED CONSTRUCTION EQUIPMENT	GRIFFITH COMPANY	\$450.00	
26	PLANNING RULE DEV & AREA SOURCES	C08323	01	SYSTEM AND PERFORMANCE AUDITS OF THE AQMD METEOROLOGICAL MONITORING	TECHNICAL AND BUSINESS SYSTEMS	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09345	31	DEMONSTRATION OF MEDIUM SPEED ELECTRIC VEHICLES	SOUTH BAY CITIES COUNCIL OF GOVERNMENTS	\$119,815.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10053	32	TECHNICAL ASSISTANCE ON THE VOUCHER INCENTIVE PROGRAM	TIAX LLC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10053	32	TECHNICAL ASSISTANCE ON THE VOUCHER INCENTIVE PROGRAM	TIAX LLC	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10061	31	MAINTENANCE AND DATA MANAGEMENT FOR THE AQMD HYDROGEN FUELING STATION	HYDROGENICS CORPORATION	\$130,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10062	01,81	TECHNICAL ASSISTANCE FOR IMPLEMENTATION OF PROPOSITION 1B PROGRAM	TIAX LLC	\$375,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C10198	01	WASHINGTON DC LEGISLATIVE REPRESENTATION	FAEGRE BAKER DANIELS, LLP	\$205,840.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C10462	01	WASHINGTON D.C. LEGISLATIVE REPRESENTATION	KADESH & ASSOCIATES LLC	\$227,660.00	
26	PLANNING RULE DEV & AREA SOURCES	C10593	01	TECHNICAL SUPPORT FOR AQMD PAMS UPPER AIR METEOROLOGICAL MONITORING	SONOMA TECHNOLOGY INC	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10663	81	PROVIDE TECHNICAL ASSISTANCE FOR THE IMPLEMENTATION OF THE PROP 1B GOODS MOVEMENT PROGRAM	CLEAN FUEL CONNECTION INC	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10696	31	OPTIMIZATION & DEMONSTRATION OF SCRT FOR NOX & PM EMISSIONS CONTROL	JOHNSON MATTHEY INC	\$0.00	6



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10697	31	OPTIMIZATION & DEMONSTRATION OF SCCRT FOR NOX & PM EMISSIONS CONTROL	JOHNSON MATTHEY INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10722	36	RE-ESTABLISH TESTING FACILITY & QUANTIFY PM EMISSION REDUCTIONS FROM CHARBROILING OPERATIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$216,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11113	32	TECHNICAL ASSISTANCE FOR IMPLEMENTATION OF INCENTIVE PROGRAMS	CLEAN FUEL CONNECTION INC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11114	32	REPOWER 16 DIESEL LOCOMOTIVES	PACIFIC HARBOR LINE INC	\$936,579.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11144	31	PROP 1B TRUCK REPLACEMENT OUTREACH AND EDUCATION-TRUCK OUTREACH CENTERS (DOE ARRA)	SAN DIEGO COMMUNITY COLLEGE DISTRICT	\$130,000.00	
03	EXECUTIVE OFFICE	C11146	01	MEDIA RELATIONS SERVICES	VALENCIA AND COMPANY	\$152,625.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11150	55	MAINTENANCE AND OPERATION OF CITY OF BURBANK HYDROGEN FUELING STATION	HYDROGEN FRONTIER, INC	\$300,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11581	17	PURCHASE UP TO 401 UNITS OF MODEL CM1936/CM1200/SPCM1936 CORDLESS ELECTRIC LAWN MOWERS	BLACK & DECKER (US) INC	\$60,976.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11601	27	PURCHASE UP TO 3,300 MODEL CM1936/CM1200/SPCM1936 CORDLESS ELECTRIC LAWN MOWERS	BLACK & DECKER (US) INC	\$199,752.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11602	27	SCRAP GASOLINE LAWN MOWERS AFTER DRAINING THE FUEL SAFELY AT THE LAWN MOWER EXCHANGE SITES	AIR POLLUTION CONTROL MANAGEMENT, INC.	\$18,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11604	27	PROVIDE SUPPORT SERVICES AT THE LAWN MOWER EXCHANGE EVENTS	PARKING CONCEPTS INC	\$15,000.00	
08	LEGAL	C11619	01	EMPLOYEE RELATIONS LITIGATION SERVICES	BEST BEST & KRIEGER	\$75,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C11738	01	IMPLEMENTATION OF THE AIR QUALITY INSTITUTE (AQI)	CORDOBA CORPORATION	\$133,470.00	
08	LEGAL	C12074	01	PROVIDE ENVIRONMENTAL LEGAL SERVICES	PC LAW GROUP	\$5,000.00	
08	LEGAL	C12074	01	PROVIDE ENVIRONMENTAL LEGAL SERVICES	PC LAW GROUP	\$1,000.00	

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08	LEGAL	C12074	01	PROVIDE ENVIRONMENTAL LEGAL SERVICES	PC LAW GROUP	\$200.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$75,000.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$75,000.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12076	32	REPOWER 2 ROUGH TERRAIN FORKLIFTS	FRANK S. SMITH MASONRY, INC	\$33,960.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12077	32	REPOWER 7 ROUGH TERRAIN FORKLIFTS	LUCAS & MERCIER CONSTRUCTION, INC	\$50,940.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12108	32	REPOWER 7 ROUGH TERRAIN FORKLIFTS	ACOUSTICAL MATERIAL SERVICES	\$67,456.00	
27	INFORMATION MANAGEMENT	C12151	01	CONTRACT FOR SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	SIERRA CYBERNETICS INC	\$193,400.00	
27	INFORMATION MANAGEMENT	C12188	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE & SUPPORT SERVICES	VARSUN ETECHNOLOGIES GROUP, INC	\$120,300.00	
27	INFORMATION MANAGEMENT	C12285	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	CMC AMERICAS INC	\$139,700.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12308	40	PERFORM WEBSITE SERVICES FOR THE CNGVP	GLADSTEIN, NEANDROSS & ASSOCIATES	\$50,000.00	
50	ENGINEERING & COMPLIANCE	C95138	01	LEASE SOUTH BAY FIELD OFFICE	PACIFICA INTERCHANGE	\$454,323.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09206	80	PURCHASE 2 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	AZUSA UNIFIED SCHOOL DISTRICT	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09209	80,82	PURCHASE 2 PROPANE SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	NEWHALL SCHOOL DISTRICT	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09210	80,82	PURCHASE TWO PROPANE SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	SAUGUS UNION SCHOOL DISTRICT	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09212	80,82	PURCHASE ONE PROPANE SCHOOL BUS WITH FIRE SUPPRESSION SYSTEM AND ASSOCIATED INFRASTRUCTURE	WM S HART UNION HIGH SCHOOL DISTRICT	\$0.00	11

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09213	80	PURCHASE 3 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	WESTMINSTER SCHOOL DISTRICT	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09215	80	PURCHASE 2 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	CHAFFEY JOINT UNION HIGH SCHOOL DISTRICT	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09217	80	PURCHASE 1 CNG SCHOOL BUS WITH FIRE SUPPRESSION AND ASSOCIATED INFRASTRUCTURE - PROP 1B SCHOOL BUS	REDLANDS UNIFIED SCHOOL DISTRICT	\$10,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G09248	82	PURCHASE AND INSTALL 46 PM TRAPS ON SCHOOL BUSES	TUMBLEWEED TRANSPORTATION	\$168,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G11568	82	PURCHASE 18 PROPANE SCHOOL BUSES AND ASSOCIATED INFRASTRUCTURE	LOS ANGELES UNIFIED SCHOOL DISTRICT	\$141,552.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G12137	82,80	PROP 1B LOWER EMISSION SCHOOL BUS REPLACEMENT PROGRAM	LOS ANGELES UNIFIED SCHOOL DISTRICT	\$0.00	11
44	MSRC	ML11021	23	PURCHASE 7 HEAVY-DUTY CNG VEHICLES	CITY OF WHITTIER	\$0.00	11
44	MSRC	MS11002	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$175,000.00	
44	MSRC	MS11002	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$525,000.00	
44	MSRC	MS11003	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	BUSWEST, LLC	\$15,000.00	
44	MSRC	MS11003	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	BUSWEST, LLC	\$225,000.00	
08	LEGAL	XC12250	01	PROVIDE RAILROAD LITIGATION SERVICES	LIGHTFOOT STEINGARD & SADOWSKY, LLP	\$150,000.00	
<b>Subtotal</b>						<b>\$6,572,798.00</b>	

**Executive Officer Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C00069	31	ASSISTANCE RE ALTERNATIVE FUEL	MICHAEL P WALSH	\$0.00	6
11	LEGAL	C01096	01	CONFLICT OF INTEREST ADVICE	OLSON HAGEL WATERS & FISHBURN LLP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C02063	35	CONSTRUCT AND OPERATE AN LNG FUELING STATION	CITY OF LONG BEACH	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C02308	01	EVALUATE FINANCIAL STABILITY OF POTENTIAL CONTRACTORS	SPERRY CAPITAL INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C04011	31	INSTALL AND DEMONSTRATE AN INDUSTRIAL PIPELINE-SUPPLIED HYDROGEN REFUELING STATION IN	AIR PRODUCTS & CHEMICALS INC	\$0.00	6
11	LEGAL	C05025	01	PERSONNEL INVESTIGATION	PUBLIC INTEREST INVESTIGATIONS INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C05260	31	CONVERSION OF LIGHT-DUTY VEHICLE TO PLUG-IN HYBRID ELECTIRIC	ENERGY CS	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C06031	31	UPGRADE EXISTING PUBLICLY ACCESSIBLE CNG FACILITY AND FUELING STATION AT CONTRACTOR'S BELLFLOWER FACILITY	RF DICKSON CO INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C06042	31	UPGRADE EXISTING CNG PUBLIC ACCESS STATION WITH DISPENSER & CARD READER	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C06084	31	UPGRADE EXISTING LNG FACILITY TO LNG/CNG AT RIVERSIDE COUNTY WASTE MANAGEMENT DEPARTMENT'S AGUA MANSA FACILITY	CLEAN ENERGY	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C06091	31	INSTALL NEW PUBLIC ACCESS CNG FUELING STATION AT THE CITY YARD	CITY OF WHITTIER	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07068	32	ELECTRIC REPOWER OF 5 AGRICULTURAL PUMP ENGINES (FY 05-06 CARL MOYER PROGRAM)	CRYSTAL ORGANIC FARMS LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07069	32	ELECTRIC REPOWER OF TWO (2) AGRICULTURAL PUMP ENGINES	AMAZING COACHELLA INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07129	31	PROVIDE TECHNICAL ASSISTANCE WITH FUEL CELL TECHNOLOGY	BREAKTHROUGH TECHNOLOGIES INSTITUTE INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07166	32	TECHNICAL ASSISTANCE WITH CNG TECHNOLOGY	BURNETT AND BURNETTE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07251	32	REPLACE ONE CLASS 8 MODEL YEAR 1976 DIESEL TRUCK WITH ONE CLASS 8 MODEL YEAR 2006 DIESEL TRUCK	GUADALUPE RODRIGUEZ GUITRON	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07314	31	TECHNICAL ASSISTANCE WITH ADVANCED HEAVY-DUTY AND OFF-ROAD TECHNOLOGIES	ENGINE FUEL & EMISSIONS ENGINEERING INC	\$0.00	6

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11	LEGAL	C07321	01	ADVICE REGARDING PUBLIC FINANCE BONDS, TAXES, FEES, ETC.	STRADLING YOCCA CARLSON & RAUTH	\$0.00	6
11	LEGAL	C07321	01	ADVICE REGARDING PUBLIC FINANCE BONDS, TAXES, FEES, ETC.	STRADLING YOCCA CARLSON & RAUTH	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08067	31	DEMONSTRATION OF HYDRAULIC-HYBRID SHUTTLE BUS	WESTSTART-CALSTART	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08185	36	RENEWABLE ENERGY PROJECTS IN COMMUNITIES SURROUNDING ELECTRICAL GENERATING FACILITIES	PERMACITY CORP	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C08197	01	DEFERRED COMP PLAN SERVICES	BENEFIT FUNDING SERVICES GROUP	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C08203	01	BIG BEAR AIRPORT AIR MONITORING STATION	BIG BEAR AIRPORT DISTRICT	\$385.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08210	01	TECHNICAL ASSISTANCE ON MOBILE SOURCE CONTROL MEASURES AND FUTURE CONSULTATION ON TAO ACTIVITIES	SAWYER ASSOCIATES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08225	01	CARSON AIR MONITORING STATION	VENTURA TRANSFER COMPANY	\$7,200.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08311	31	TECHNICAL ASSISTANCE WITH DEVELOPMENT, OUTREACH, AND COMMERCIALIZATION OF ADVANCED TECHNOLOGY TO TRANSIT, PORT AND OTHER ACTIVITIES	WESTSTART-CALSTART	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08318	31	DEMONSTRATION OF NOx AND PM EMISSIONS CONTROL ON CONSTRUCTION EQUIPMENT	SERVOTECH ENGINEERING	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C08328	01	WEB-BASED SOFTWARE FOR EMPLOYEE RECRUITING	GOVERNMENTJOBS.COM INC	\$7,300.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C08356	01	AQMD SACRAMENTO OFFICE LEASE	RUBICON PROPERTY MANAGEMENT	\$19,824.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C08356	01	AQMD SACRAMENTO OFFICE LEASE	RUBICON PROPERTY MANAGEMENT	\$19,824.00	
27	INFORMATION MANAGEMENT	C09129	01	SYSTEMS DEVELOPMENT AND SUPPORT SYSTEMS	VARSUN ETECHNOLOGIES GROUP, INC	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09252	31	TECHNICAL ASSISTANCE WITH REVIEW AND ASSESSMENT OF ADVANCED TECHNOLOGIES, HEAVY-DUTY ENGINES AND CONVENTIONAL AND ALTERNATE FUELS	JWM CONSULTING SERVICES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09255	01	TECHNICAL ASSISTANCE WITH CALTRANS	STAN LISIEWICE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09290	31	EVALUATE EMISSIONS IMPACTS FROM NATURAL GAS BLENDS ON VEHICLE EMISSIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09290	31	EVALUATE EMISSIONS IMPACTS FROM NATURAL GAS BLENDS ON VEHICLE EMISSIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6
27	INFORMATION MANAGEMENT	C09350	01	CONTRACT FOR SHORT AND LONG-TERM SYSTEMS DEVELOPMENT AND MAINTENANCE SUPPORT	CMC AMERICAS INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09356	32	REPOWER 2 DOZERS (FY 07/08 CARL MOYER/SOON PROGRAM)	JAGUR TRACTOR	\$0.00	11
04	FINANCE	C09376	01	AQMD INDEPENDENT AUDITING SERVICES	THOMPSON COBB BAZILIO & ASSOCIATES PC	\$2,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09399	01	DEVELOP SYSTEMIC SCIENTIFICALLY BASED ODOR IDENTIFICATION/COMPLAINT RESOLUTION	JANE MICHAEL CURREN	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09400	01	DEVELOP SYSTEMIC SCIENTIFICALLY BASED ODOR IDENTIFICATION/COMPLAINT RESOLUTION	MH3 CORPORATION	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10001	01	STAMPFRAG MEMBER SERVICES	CENTER FOR CONTINUING STUDY-CA ECONOMY	\$10,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C10001	01	STAMPFRAG MEMBER SERVICES	CENTER FOR CONTINUING STUDY-CA ECONOMY	\$10,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10009	01	STUDENT CO-OP PROGRAM	CAL STATE POLYTECHNIC POMONA FOUNDATION	\$21,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10022	32	RETROFIT ONE ON-ROAD DIESEL TRUCK	HAULIN HULLS TRUCKING	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10032	32	RETROFIT 1 ON-ROAD TRUCK (FY 08-09/YEAR 11 CARL MOYER PROGRAM)	J ELIZALDE TRANSPORT	\$0.00	1

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08	LEGAL	C10052	01	PROVIDE EMPLOYEE RELATIONS LITIGATION SERVICES	LIEBERT CASSIDY WHITMORE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10056	31	ADVANCED TRAINING TECHNOLOGY PROGRAM	SAN DIEGO COMMUNITY COLLEGE DISTRICT	\$0.00	6
08	LEGAL	C10060	01	PROVIDE EMPLOYEE LITIGATION SERVICES	WILEY PRICE & RADULOVICH	\$0.00	6
08	LEGAL	C10060	01	PROVIDE EMPLOYEE LITIGATION SERVICES	WILEY PRICE & RADULOVICH	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10061	01	MAINTENANCE AND DATA MANAGEMENT FOR THE AQMD HYDROGEN FUELING STATION	HYDROGENICS CORPORATION	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10094	32	REPLACE ONE CLASS 8, 1990 MODEL YEAR DIESEL TRUCK (1989 ENGINE) WITH ONE CLASS 8 DIESEL TRUCK	LEO'S TRUCKING, INC.	\$0.00	11
26	PLANNING RULE DEV & AREA SOURCES	C10135	36	TREE PLANTING PARTNERSHIP	CITY OF REDLANDS	\$0.00	6
08	LEGAL	C10139	01	ENVIRONMENTAL LITIGATION	BINGHAM MCCUTCHEN LLP	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10142	36	TREE PLANTING PARTNERSHIP	CITY OF RIVERSIDE	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10151	36	TREE PLANTING PARTNERSHIP	CITY OF CATHEDRAL CITY	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10162	32	REPOWER 5 DIESEL SCRAPERS AND RETROFIT 3 OF THE 5 GRADERS PLUS AN ADDITIONAL 2 GRADERS	MILLER BLADES, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10172	32	REPOWER 4 SINGLE ENGINE SCRAPERS AND 2 GRADERS	MILLER EQUIPMENT COMPANY INC	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10485	36	TREE PLANTING PARTNERSHIP	CITY OF CATHEDRAL CITY	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10504	32	REPOWER 1 SINGLE ENGINE SCRAPER AND 2 GRADERS	FINE GRADE EQUIPMENT, INC.	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10506	36	TREE PLANTING PARTNERSHIP-CITY OF CLAREMONT	CITY OF CLAREMONT	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C10548	01	FEDERAL SURFACE TRANSPORTATION REAUTHORIZATION	LEE ANDREWS GROUP INC	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C10548	01	FEDERAL SURFACE TRANSPORTATION REAUTHORIZATION	LEE ANDREWS GROUP INC	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C10548	01	FEDERAL SURFACE TRANSPORTATION REAUTHORIZATION	LEE ANDREWS GROUP INC	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10591	32	REPOWER 33 RUBBER-TIRED LOADERS (FY 08-09/ YEAR 11 CARL MOYER PROGRAM/SOON)	ROBERTSON'S READY MIX	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10594	01	STUDENT CO-OP PROGRAM	CAL STATE POLYTECHNIC POMONA FOUNDATION	\$7,500.00	
26	PLANNING RULE DEV & AREA SOURCES	C10594	01	STUDENT CO-OP PROGRAM	CAL STATE POLYTECHNIC POMONA FOUNDATION	\$7,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10607	80	REPOWER 6 MAIN AND 1 AUXILIARY ENGINES OF THREE MARINE VESSELS (FY 08-09/YEAR 11 CARL MOYER PROGRAM)	AMERICAN MARINE CORP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10607	80	REPOWER 6 MAIN AND 1 AUXILIARY ENGINES OF THREE MARINE VESSELS (FY 08-09/YEAR 11 CARL MOYER PROGRAM)	AMERICAN MARINE CORP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10607	32	REPOWER 6 MAIN AND 1 AUXILIARY ENGINES OF THREE MARINE VESSELS (FY 08-09/YEAR 11 CARL MOYER PROGRAM)	AMERICAN MARINE CORP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10621	32,80	REPOWER 4 DIESEL CRANES	FOUNDATION PILE, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10650	31	DEMONSTRATION OF ADVANCED FUEL CELL BUS (AMERICAN FUEL CELL BUS)	SUNLINE TRANSIT AGENCY	\$0.00	4
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10659	50	DEVELOPMENT OF MEDIUM-DUTY PLUG-IN HYBRID VEHICLES	EPRI	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10662	31	PROVIDE TECHNICAL ASSISTANCE FOR THE IMPLEMENTATION OF THE PROP 1B GOODS MOVEMENT PROGRAM	GLADSTEIN, NEANDROSS & ASSOCIATES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10700	01	TECHNICAL ASSISTANCE FOR ADVANCED, LOW- AND ZERO-EMISSIONS MOBILE AND STATIONARY	TIAX LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10700	01	TECHNICAL ASSISTANCE FOR ADVANCED, LOW- AND ZERO-EMISSIONS MOBILE AND STATIONARY	TIAX LLC	\$70,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10717	81	NATURAL GAS TRUCKS EDUCATION AND OUTREACH - ARRA AWARD	WESTERN RIVERSIDE CLEAN CITIES COALITION	\$0.00	6
08	LEGAL	C10736	01	PROVIDE INTELLECTUAL PROPERTY COUNSEL SERVICES	LINER GRODE STEIN YANKELEVITZ SUNSHINE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11027	32	REPOWER OF 4 LOADERS (FY 08/09 YEAR 11 CARL MOYER PROGRAM)	SA RECYCLING LLC	\$0.00	6



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11027	32	REPOWER OF 4 LOADERS (FY 08/09 YEAR 11 CARL MOYER PROGRAM)	SA RECYCLING LLC	\$0.00	11
16	ADMINISTRATIVE & HUMAN RESOURCES	C11033	01	PARTICIPATE IN THE WEST INLAND EMPIRE EMPLOYMENT RELATIONS CONSORTIUM	LIEBERT CASSIDY WHITMORE	\$3,385.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11042	51	OUTREACH AND EDUCATION ACTIVITIES IN SUPPORT OF AMERICAN RECOVERY AND REINVESTMENT ACT AWARDS	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11042	51	OUTREACH AND EDUCATION ACTIVITIES IN SUPPORT OF AMERICAN RECOVERY AND REINVESTMENT ACT AWARDS	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11052	27	DEVELOP PROTOTYPE NATURAL GAS-FIRED, FAN-TYPE CENTRAL FURNACES WITH REDUCED NOx EMISSIONS	NORDYNE LLC	\$0.00	4
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11079	81	PROP 1B PORT TRUCK REPLACEMENT PROGRAM OUTREACH	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11079	81	PROP 1B PORT TRUCK REPLACEMENT PROGRAM OUTREACH	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11083	81	NEW TRUCK REPLACEMENTS SERVING THE PORTS OF LOS ANGELES AND LONG BEACH	JULIO H. RODRIGUEZ	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11085	81	NATURAL GAS TRUCKS EDUCATION AND OUTREACH - DOE ARRA AWARD	C3VR, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11108	81	NATURAL GAS TRUCKS EDUCATION AND OUTREACH - ARRA AWARD	CITY OF LOS ANGELES-DEPT OF PUBLIC WORKS	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11117	01	TECHNICAL ASSISTANCE FOR ADVANCED, LOW- AND ZERO-EMISSION MOBILE & STATIONARY SOURCE CONTROL TECHNOLOGIES	CLEAN FUEL CONNECTION INC	\$41,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11132	81	NEW TRUCK REPLACEMENTS (FY 2007-08 PROPOSITION 1B) NON-PORT	G.Q. TRUCKING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11132	81	NEW TRUCK REPLACEMENTS (FY 2007-08 PROPOSITION 1B) NON-PORT	G.Q. TRUCKING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11133	81	PROP 1B TRUCK REPLACEMENT (NONPORT)	FL TRANSPORTATION, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11167	80	REPOWER 1 CRAWLER TRACTOR AND 1 RUBBER-TIRED DOZER	KASSEL CONTRACTING, INC.	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11173	32	REPOWER 3 DIESEL CRAWLER TRACTORS, 1 RUBBER-TIERED LOADER, 1 DIESEL EXCAVATOR, & 1 DIESEL SCRAPER (FY 09-10/YEAR 12 CARL MOYER PROGRAM)	CHINO GRADING, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11191	32	REPOWER 1 DIESEL SCRAPER, 1 DIESEL RUBBER-TIRED DOZER, 2 DIESEL CRAWLER TRACTORS, AND 2 DIESEL WATERPULLS	MESA CONTRACTING CORPORATION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11193	32	REPOWER 1 DIESEL SCRAPER AND 1 DIESEL GRADER	EARL HIGGINS, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11193	32	REPOWER 1 DIESEL SCRAPER AND 1 DIESEL GRADER	EARL HIGGINS, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11194	80	REPOWER 1 DIESEL RUBBER-TIRED LOADER, 2 DIESEL GRADERS, AND 1 DIESEL SCRAPER	BILL HIGGINS, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11203	81	PROP 1B TRUCK PROGRAM	WARE DISPOSAL, INC.	\$0.00	6
03	EXECUTIVE OFFICE	C11206	01	SIGNATURE AQMD FILM	CINEMA VERTIGE, LLC	\$0.00	6
03	EXECUTIVE OFFICE	C11206	01	SIGNATURE AQMD FILM	CINEMA VERTIGE, LLC	\$28,530.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11209	32	REPOWER 1 DIESEL RUBBER-TIRED DOZER, 1 DIESEL GRADER, 1 DIESEL CRAWLER TRACTOR, AND 5 DIESEL SCRAPERS	LEE & STIRES INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11210	80	REPOWER 1 DIESEL RUBBER-TIRED LOADER AND 2 DIESEL SCRAPERS	R. D. MATTHEWS, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11211	32	REPOWER 4 DIESEL DUAL-ENGINE SCRAPERS AND 2 DIESEL RUBBER-TIRED DOZERS	SUKUT CONSTRUCTION, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11211	32	REPOWER 4 DIESEL DUAL-ENGINE SCRAPERS AND 2 DIESEL RUBBER-TIRED DOZERS	SUKUT CONSTRUCTION, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11213	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ROBERTSON'S READY MIX	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11217	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOUG MARTIN CONTRACTING CO., INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11221	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	RANCHO FOODS INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11221	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	RANCHO FOODS INC	\$0.00	11

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11233	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ISRAEL BENITEZ	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11327	81	PROP 1B TRUCK REPLACEMENT (NONPORT)	SCHECKLA CO.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11347	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PACIFIC HIGH LEASING, LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11350	81	PROP 1B TRUCK REPLACEMENT PROGRAM - NON-PORT	TEAM CAMPBELL LOGISTICS, LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11350	81	PROP 1B TRUCK REPLACEMENT PROGRAM - NON-PORT	TEAM CAMPBELL LOGISTICS, LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11370	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS VALLADARES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11385	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	MSI-MODULAR SYSTEMS INSTALLATION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11388	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	JOSE R. VALLADARES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11396	80	REPOWER 3 OFF-ROAD CONSTRUCTION EQUIPMENT	MBA GRADING & DEMOLITION, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11410	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	MEX-CAL TRUCKLINE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11411	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CENTURY SAND & GRAVEL INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11412	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	GORDON TRUCKING, INC	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C11428	01	ONLINE CURRICULUM CONVERSION PROJECT	THINK EARTH ENVIRONMENTAL EDUCATION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11431	32	REPOWER 5 DIESEL SCRAPERS	COBURN EQUIPMENT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11431	32	REPOWER 5 DIESEL SCRAPERS	COBURN EQUIPMENT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11443	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MEX-CAL TRUCKLINE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11450	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	ODBIN ELI ESTRADA	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11456	81	PROP 1B TRUCK REPLACEMENT (NONPORT)	CITY NATIONAL BANK	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11457	81	PROP 1B TRUCK REPLACEMENT ADMINISTRATOR	CALIFORNIA CARTAGE CO, LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11470	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	CESAR R. TRUCKING INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11484		TRUCK OUTREACH CENTERS	GLADSTEIN, NEANDROSS & ASSOCIATES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11485	31	REPOWER DIESEL-FUELED REFUSE TRUCK WITH NATURAL GAS ENGINE	WASTE MANAGEMENT COLLECTION & RECYCLING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11494	81	PROP 1B TRUCK REPLACEMENT PROGRAM - LNG FUNDED BY DOE/CEC	BNJ TRANS	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11496	81	HEAVY DUTY NATURAL GAS TRUCK REPLACEMENT FUNDED BY DOE-PROP 1B	NEW BERN TRANSPORT CORPORATION	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11496	81	HEAVY DUTY NATURAL GAS TRUCK REPLACEMENT FUNDED BY DOE-PROP 1B	NEW BERN TRANSPORT CORPORATION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11520	80	REPLACE 10 DIESEL SCRAPERS AND 1 DIESEL WATER PULL, AND REPOWER 2 DIESEL SCRAPERS	LARRY JACINTO CONSTRUCTION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11523	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	SYSCO FOOD SERVICES OF LOS ANGELES INC	\$0.00	11
35	LEGISLATIVE & PUBLIC AFFAIRS	C11540	01	CONSULTATION REGARDING GOODS MOVEMENT STRATEGIES - FEDERAL SURFACE TRANSPORTATION REAUTHORIZATION	GERMANIA GOVERNMENTAL SERVICES CORP.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11543	80	REPOWER 12 OFF-ROAD EQUIPMENT	SA RECYCLING LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11549	81	PROP 1B TRUCK REPLACEMENT PROGRAM LEASE TO OWN PROGRAM	CITY NATIONAL BANK	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11550	81	PROP 1B LEASE TO OWN ADMINISTRATOR	CALIFORNIA CARTAGE CO, LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11550	81	PROP 1B LEASE TO OWN ADMINISTRATOR	CALIFORNIA CARTAGE CO, LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11556	32	REPOWER 21 OFF-ROAD VEHICLES	RENTRAC INC	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11567	81	PROP 1B NEW TRUCK REPLACEMENTS (NON-PORT)	TOTAL TRANSPORTATION SVCS, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11586		STUDY NEAR ROADWAY POLLUTANT EXPOSURE MITIGATION MEASURES	SIERRA RESEARCH, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11587	36	STUDY NEAR ROADWAY POLLUTANT EXPOSURE MITIGATION MEASURES	THE PLANNING CENTER	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11588	01	CONDUCT CONCEPTUAL FEASIBILITY STUDY FOR REDUCTION OF NEAR ROADWAY POLLUTANT EXPOSURES	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$0.00	6
08	LEGAL	C11594	01	LEGAL REPRESENTATION	PERKINS COIE LLP	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C11607	01	NATURAL GAS PURCHASE AGREEMENT	STATE OF CALIFORNIA	\$27,000.00	
08	LEGAL	C11619	01	EMPLOYEE RELATIONS LITIGATION SERVICES	BEST BEST & KRIEGER	\$65,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11689	32	REPOWER 1 RUBBER-TIRED LOADER AND 1 SPEED SWING	J.A. PLACEK CONSTRUCTION CO.	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C11737	01	SOCIOECONOMIC CONSULTING SERVICES	KAREN POLENSKE	\$10,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C11737	01	SOCIOECONOMIC CONSULTING SERVICES	KAREN POLENSKE	\$10,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C11742	01	AQMP SOCIOECONOMIC DATA MANAGEMENT SERVICES	MACROSYS, LLC	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C11745	01	HEALTH BENEFIT ASSESSMENT FOR THE 2012 AQMP	STRATUS CONSULTING INC	\$70,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12021	80	REPOWER AND RETROFIT 4 OFF-ROAD VEHICLES.	GEERLINGS EQUIPMENT RENTAL, INC	\$0.00	6
08	LEGAL	C12073	01	LEGAL COUNSEL	WILMER CUTLER PICKERING HALE & DORR LLP	\$0.00	11
08	LEGAL	C12073	01	LEGAL COUNSEL	WILMER CUTLER PICKERING HALE & DORR LLP	\$0.00	6
08	LEGAL	C12073	01	LEGAL COUNSEL	WILMER CUTLER PICKERING HALE & DORR LLP	\$30,000.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$0.00	6
10	LEGAL	C12111	01	OSHA LAW/COUNSEL	WALTER & PRINCE LLP	\$0.00	6
04	FINANCE	C12127	32	PURCHASE AND INSTALL ON-BOARD SHORE POWER RETROFIT EQUIPMENT ON A PASSENGER VESSEL	CARNIVAL CRUISE LINES	\$0.00	11

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10	LEGAL	C12128	01	EMPLOYMENT & LABOR LAW	FISHER & PHILLIPS, LLP	\$0.00	6
10	LEGAL	C12128	01	EMPLOYMENT & LABOR LAW	FISHER & PHILLIPS, LLP	\$10,000.00	
08	LEGAL	C12129	01	PROVIDE EMPLOYMENT AND LABOR LAW ADVICE AND REPRESENTATION	JACKSON LEWIS, LLP	\$0.00	6
03	EXECUTIVE OFFICE	C12172	01	SIGNATURE AQMD FILM	CINEMA VERTIGE, LLC	\$0.00	6
03	EXECUTIVE OFFICE	C12172	01	SIGNATURE AQMD FILM	CINEMA VERTIGE, LLC	\$9,380.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12187	80	REPOWER 4 ROUGH TERRAIN FORKLIFTS	INTERNATIONAL CARGO EQUIPMENT, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12213	32	REPOWER 8 MAIN ENGINES ON 6 MARINE VESSELS	SOUTHWEST MARINE RESOURCES, LLC	\$0.00	1
03	EXECUTIVE OFFICE	C12302	01	BUDGETARY CONSULTING SERVICES	CREEKSIDE CONSULTING SERVICES	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C90019	01	BURBANK AIR MON. STATION LEASE	CHARLOTTE HEIL	\$0.00	2
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C90095	01	RIVERSIDE/MAGNOLIA AM LEASE	NORMA J ROOKEY	\$34,128.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C99109	01	LEASE ELECTRIC VEHICLE	TOYOTA MOTOR CREDIT CORPORATION	\$3,951.00	
44	MSRC	ML05013	23	SANTA CLARITA VALLEY INTELLIGENT TRANSPORTATION SYSTEM	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML05013	23	SANTA CLARITA VALLEY INTELLIGENT TRANSPORTATION SYSTEM	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML05013	23	SANTA CLARITA VALLEY INTELLIGENT TRANSPORTATION SYSTEM	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML05014	23	SYNCHRONIZE TWENTY FOUR TRAFFIC SIGNALS ON FLORENCE/MILLS AVENUES	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML06070	23	PURCHASE TWO CNG VEHICLES	CITY OF COLTON	\$0.00	6
44	MSRC	ML07033	23	PURCHASE HEAVY-DUTY CNG VEHICLE & UPGRADE CNG STATION	CITY OF LA HABRA	\$0.00	6
44	MSRC	ML08027	23	PURCHASE AND INSTALLATION OF 34 FLEET MANAGEMENT AND VEHICLE DIAGNOSTIC SYSTEM DEVICES	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML08027	23	PURCHASE AND INSTALLATION OF 34 FLEET MANAGEMENT AND VEHICLE DIAGNOSTIC SYSTEM DEVICES	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML08049	23	PURCHASE ONE HEAVY-DUTY CNG VEHICLE	CITY OF CERRITOS	\$0.00	6
44	MSRC	ML08050	23	PURCHASE 3 HEAVY-DUTY LPG TROLLEYS	CITY OF LAGUNA BEACH	\$0.00	6

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44	MSRC	ML09008	23	PURCHASE 6 HEAVY-DUTY CNG VEHICLES	CITY OF CULVER CITY	\$0.00	6
44	MSRC	ML09013	23	SYNCHRONIZE SIGNALS WITH CITY OF MORENO VALLEY ON ALESSANDRO BOULEVARD.	CITY OF RIVERSIDE	\$0.00	6
44	MSRC	ML09014	23	CYNCHRONIZE SIGNALS WITH THE CITY OF CORONA ON MAGNOLIA AVENUE	CITY OF RIVERSIDE	\$0.00	6
44	MSRC	ML09015	23	SYNCHRONIZE SIGNALS WITH COUNTY OF RIVERSIDE ON VAN BUREN BLVD.	CITY OF RIVERSIDE	\$0.00	6
44	MSRC	ML09020	23	PURCHASE 252 DIAGNOSTIC SYSTEMS	COUNTY OF SAN BERNARDINO	\$0.00	11
44	MSRC	ML09027	23	DEVELOP FREEWAY DETECTOR MAP INTERFACE	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML09033	23	BUY 10 HD CNG VEHICLES & INSTALL CNG STATION	CITY OF BEVERLY HILLS	\$0.00	6
44	MSRC	ML09035	23	PURCHASE 2 HEAVY-DUTY CNG VEHICLES AND INSTALL CNG STATION.	CITY OF FULLERTON	\$0.00	6
44	MSRC	ML09036	23	PURCHASE 35 HEAVY-DUTY NATURAL GAS VEHICLES	CITY OF LONG BEACH	\$0.00	6
44	MSRC	ML09041	23	PURCHASE 35 HEAVY-DUTY NATURAL GAS VEHICLES	CITY OF LOS ANGELES	\$0.00	11
44	MSRC	MS07061	23	DEMONSTRATE RETROFIT DEVICES ON THREE OFF-ROAD VEHICLES (SHOWCASE PROGRAM)	CITY OF LOS ANGELES	\$0.00	6
44	MSRC	MS07070	23	DEMONSTRATE RETROFIT DEVICES ON EIGHT OFFROAD VEHICLES (SHOWCASE PROGRAM)	GRIFFITH COMPANY	\$0.00	6
44	MSRC	MS07071	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES	TIGER 4 EQUIPMENT LEASING INC	\$0.00	6
44	MSRC	MS07076	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES (SHOWCASE PROGRAM)	REED THOMAS CO INC	\$0.00	6
44	MSRC	MS07080	23	DEMONSTRATE RETROFIT DEVICES ON THREE OFF-ROAD VEHICLES (SHOWCASE PROGRAM)	CITY OF LOS ANGELES-DEPT OF PUBLIC WORKS	\$0.00	6
44	MSRC	MS07092	23	IMPLEMENT 511 COMMUTER SERVICES OUTREACH CAMPAIGN	RIVERSIDE CO TRANSPORTATION COMMISSION	\$0.00	4
44	MSRC	MS08013	23	PURCHASE 12 YARD TRACTORS EQUIPPED WITH ADVANCED NG ENGINES	UNITED PARCEL SERVICE, INC	\$0.00	6

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44	MSRC	MS10025	23	IMPLEMENT TELEWORK DEMONSTRATION PROGRAM	ELHAM SHIRAZI	\$0.00	6
44	MSRC	MS10025	23	IMPLEMENT TELEWORK DEMONSTRATION PROGRAM	ELHAM SHIRAZI	\$0.00	6
44	MSRC	MS11002	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$0.00	6
44	MSRC	MS11006	23	IMPLEMENT SPECIAL METROLINK SERVICE TO ANGEL STADIUM	ORANGE CO TRANSPORTATION AUTHORITY	\$0.00	6
44	MSRC	MS11010	23	CONSTRUCT LNG FUELING STATION	BORDER VALLEY TRADING	\$0.00	6
<b>Subtotal</b>						<b>\$615,407.00</b>	

**V. TERMINATED CONTRACTS-PARTIAL/NO WORK PERFORMED**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C05260	31	CONVERSION OF LIGHT-DUTY VEHICLE TO PLUG-IN HYBRID ELECTRIC	ENERGY CS	-\$45,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08003	32	REPOWER AND RETROFIT FRONT & REAR ENGINES ON 6 HEAVY DUTY CONSTRUCTION EQUIPMENT	PEED EQUIPMENT	-\$588,195.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08022	32	REPOWER AND REFIT 11 DOZERS AND 5 DUAL-ENGINE SCRAPERS (FY 06-07 CARL MOYER PROGRAM)	SUKUT CONSTRUCTION, INC.	-\$954,654.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08160	32	RETROFIT 34 ON-ROAD TRUCKS	EZE TRUCKING CO., INC.	-\$436,688.00	7
26	PLANNING RULE DEV & AREA SOURCES	C09013	01	PREPARE CEQA DOCUMENTS FOR THE PROPOSED MODERNIZATION OF THE INTERMODAL COASTAL CONTAINER TRANSFER FACILITY	ENVIRONMENTAL AUDIT INC	-\$149,906.23	7
26	PLANNING RULE DEV & AREA SOURCES	C09014	01	PREPARE AN EMISSIONS INVENTORY AND HEALTH RISK ASSESSMENT FOR THE INTERMODAL CONTAINER FACILITY MODERNIZATION PROJECT	CASTLE ENVIRONMENTAL CONSULTING, LLC	-\$123,037.01	7
26	PLANNING RULE DEV & AREA SOURCES	C09045	01	COMPLETE CEQA ANALYSIS FOR EXPANSION AND MODERNIZATION OF UNION PACIFIC INTERMODAL CONTAINER TRANSFER FACILITY	ITERIS, INC.	-\$108,096.75	7



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26	PLANNING RULE DEV & AREA SOURCES	C09188	01	CEQA DOCUMENT FOR ICTF EXPANSION	PARSONS TRANSPORTATION GROUP INC.	-\$101,225.91	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09285	32	REPOWER 8 DIESEL CATERPILLAR SCRAPERS (FY 07/08 SOON PROGRAM)	JAGUR TRACTOR	-\$3,139.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09419	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	PECK ROAD FORD TRUCK SALES, INC.	-\$295,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09422	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	CARMENITA TRUCK CENTER	-\$350,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09423	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	INLAND KENWORTH (US) INC	-\$595,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09424	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	LOS ANGELES FREIGHTLINER	-\$280,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09425	32,80	VOUCHER INCENTIVE PROGRAM	RUSH TRUCK CENTER OF CALIFORNIA	-\$705,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09426	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	WESTRUX INTERNATIONAL, INC.	-\$295,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10006	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	TEC OF CALIFORNIA	-\$715,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10008	32,80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	WESTERN TRUCK EXCHANGE	-\$750,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10031	32	RETROFIT 4 ON-ROAD DIESEL TRUCKS	VILLA PARK TRUCKING, INC.	-\$46,906.74	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10120	32	REPOWER 6 MAIN AND 5 AUXILIARY ENGINES OF 3 MARINE VESSELS	MILLENNIUM MARITIME INC	-\$612,500.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10199	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	CASCADE SIERRA SOLUTIONS	-\$250,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10463	80	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	BOERNER TRUCK CENTER	-\$250,000.00	7

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10644	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	CASCADE SIERRA SOLUTIONS	-\$450,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10673	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINE ON 2 MARINE VESSELS	MORE CARNAGE, LLC	-\$155,593.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11027	80	REPOWER OF 4 LOADERS	SA RECYCLING LLC	-\$63,017.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11125	01	RETROFIT 200 CLASS 8, PRE-2007 DIESEL TRUCKS (PROP 1B EPA FUND)	GARDNER TRUCKING, INC.	-\$1,000,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11134	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	CASCADE SIERRA SOLUTIONS	-\$100,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11153	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	MARTIN BROS TRUCKING, INC.	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11160	32	AQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	ENTERPRISE MOTORS, INC.	-\$390,766.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11161	32	AQMD APPROVED PARTICIPATING DEALERSHIP IN THE VOUCHER INCENTIVE PROGRAM	TOM'S TRUCK CENTER, INC.	-\$675,766.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11162	32	APPROVED DEALERSHIP IN VOUCHER INCENTIVE PROGRAM - VIP	UNITED TRUCK CENTERS, INC.	-\$720,766.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11163	80	AQMD APPROVED RETROFIT DEVICE INSTALLER - VIP PROGRAM	IRONMAN PARTS AND SERVICES	-\$156,107.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11164	80	AQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	QUINN COMPANY	-\$156,107.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11165	80	AQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	VALLEY POWER SYSTEMS, INC.	-\$156,107.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11166	80	APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	CUMMINS CAL PACIFIC	-\$156,107.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11170	80	AQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM (VIP)1	BOSHART ENGINEERING, INC.	-\$156,107.00	7

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11328	81	PROP 1B TRUCK REPLACEMENT (NONPORT)	UNITED PARCEL SERVICE, INC	-\$300,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11336	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	VPT INC.	-\$48,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11382	81	PROP 1B TRUCK REPLACEMENT (NONPORT)	RIGOBERTO ALVAREZ GONZALEZ	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11405	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	DEPENDABLE HIGHWAY EXPRESS, INC.	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11406	81	PROP 1B HEAVY-DUTY TRUCK REPLACEMENT	EDUARDO GONZALEZ	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11409	81	HEAVY-DUTY TRUCK REPLACEMENT PROGRAM - PROP 1B GOODS MOVEMENT PROGRAM	AFS TRUCKING	-\$150,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11549	81	PROP 1B TRUCK REPLACEMENT PROGRAM LEASE TO OWN PROGRAM	CITY NATIONAL BANK	-\$200,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11582	17	PURCHASE UP TO 401 MODEL CE 5.4/CE 6.4 CORDLESS ELECTRIC LAWN MOWERS	NEUTON LAWN MOWER COMPANY	-\$61,328.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11603	27	PURCHASE UP TO 3,300 MODEL CE 5.4/CE 6.4 CORDLESS ELECTRIC LAWN MOWERS	NEUTON LAWN MOWER COMPANY	-\$358,996.00	7
02	GOVERNING BOARD	C12012	01	BOARD DISCRETIONARY FUNDS CONTRACT	NICOLE NISHIMURA	-\$18,060.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12120	31	RETROFIT 40 HEAVY-DUTY DIESEL TRUCKS WITH DIESEL PARTICULATE FILTERS	STANDARD CONCRETE PRODUCTS INC.	-\$125,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G10732	82	PURCHASE 112 PM TRAPS FOR SCHOOL BUSES	FIRST STUDENT INC.	-\$680,000.00	7
44	MSRC	ML05009	23	INSTALL SEVEN LPG REFUELING STATIONS	COUNTY OF LOS ANGELES	-\$56,666.00	7
44	MSRC	ML07036	23	PURCHASE 3 HEAVY-DUTY CNG VEHICLES AND UPGRADE CNG FUELING STATION	CITY OF ALHAMBRA	-\$95,839.00	7
44	MSRC	ML08034	23	PURCHASE EIGHT HEAVY-DUTY CNG VEHICLES	SAN BERNARDINO COUNTY	-\$50,000.00	7

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44	MSRC	ML09017	23	PURCHASE 8 HEAVY-DUTY ALTERNATIVE FUEL VEHICLES	COUNTY OF SAN BERNARDINO	-\$200,000.00	7
44	MSRC	ML09018	23	RETROFIT 85 OFF-ROAD VEHICLES	DEPARTMENT OF WATER & POWER	-\$850,000.00	7
44	MSRC	ML09043	23	UPGRADE CNG STATION	CITY OF COVINA	-\$7,000.00	7
44	MSRC	MS07059	23	DEMONSTRATE RETROFIT DEVICES ON 10 OFF-ROAD VEHICLES (SHOWCASE PROGRAM)	LOS ANGELES COUNTY SANITATION DISTRICT	-\$16,800.00	7
44	MSRC	MS07070	23	DEMONSTRATE RETROFIT DEVICES ON EIGHT OFFROAD VEHICLES (SHOWCASE PROGRAM)	GRIFFITH COMPANY	-\$62,271.00	7
44	MSRC	MS07076	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES "SHOWCASE PROGRAM"	REED THOMAS CO INC	-\$8,977.00	7
44	MSRC	MS08055	23	CONSTRUCT LNG FUELING STATION - LONG BEACH-NEW DOCK STREET	CLEAN ENERGY	-\$400,000.00	7
44	MSRC	MS08062	23	CONSTRUCT CNG FUELING STATION- RIALTO	GO NATURAL GAS, INC.	-\$400,000.00	7
<b>Subtotal</b>						<b>-\$16,279,728.64</b>	

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	<b><u>SPECIAL FUNDS</u></b>				<b><u>FOOTNOTES</u></b>		
17	ADV. TECH, OUTREACH & EDU FUND						1 NO FIXED VALUE
20	AIR QUALITY ASSISTANCE FUND						2 RATES VARY - NO FIXED VALUE
23	MSRC FUND						3 REVENUE CONTRACT - NO AMOUNT SHOWN
27	AIR QUALITY INVESTMENT FUND						4 NO COST - COST REALLOCATION
31	CLEAN FUELS FUND						5 CHANGED TO EMPLOYEE STATUS
32	CARL MOYER FUND - SB1107 ACCOUNT						6 NO COST- TIME EXTENSION
33	SCHOOL BUS REPLACEMENT PROGRAM						7 DE-OBLIGATION OF FUNDING
34	ZERO EMISSION VEHICLE INCENTIVE PROGRAM						8 COMPETITIVE SOLICITATION ISSUED BY ANOTHER GOVERNMENT AGENCY
35	AES SETTLEMENT PROJECTS FUND						
36	RULE 1309.1 PRIORITY RESERVE FUND						9 NO COST - AIR MONITORING/LICENSE AGR
37	CARB ERC BANK FUND						10 CNG VEHICLE PARTNERSHIP SELECTION
38	LADWP SETTLEMENT PROJECTS FUND						11 NO COST - CHANGE IN TERMS
39	STATE EMISSIONS MITIGATION FUND						12 FEDERAL GOVERNMENT PASS-THRU
40	NATURAL GAS VEHICLE PARTNERSHIP FUND						13 AT DIRECTION OF LEGISLATIVE COMMITTEE
41	STATE BUG FUND						14 OPTIONAL YEAR RENEWAL/MULTI-YR CONTRACT
45	CBE/CBO SETTLEMENT AGREEMENT FUND						
46	BP ARCO SETTLEMENT FUND						
50	DOE ARRA-PLUG-IN HYBRID ELECTRIC VEHICLES						
51	DOE ARRA-LNG CORRIDOR EXPANSION						
52	TRAPAC SCHOOL AIR FILTRATION						
53	EMISSION REDUCTION AND OUTREACH FUND						
56	HEROS II PROGRAM FUND						
71	CNG FUELING STATION ENTERPRISE FUND						
80	CARL MOYER FUND - AB923 ACCOUNT						
81	PROPOSITION 1B - GOODS MOVEMENT FUND						
82	PROPOSITION 1B - LOWER EMISSION SCHOOL BUS						

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 19

REPORT: Summary of Changes to FY 2011-12 Approved Budget

SYNOPSIS This is the year-end report of budget changes for FY 2011-12.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:DRP:NCC:lg

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### **Background**

Revisions are made to the budget either through Board-approved changes or through organizational unit-requested budget changes which reallocate already-budgeted funds within a Major Object to meet operational needs, but do not increase the budget. Staff has prepared this report on budget revisions made during the FY 2011-12. Organizational unit-requested budget changes have included such items as a transfer of budgeted funds from Planning, Rules and Area Sources and from Engineering and Compliance to Information Management for the development of a new Interactive Voice Response (IVR) system to support the “Check Before You Burn” program; from District General to Information Management to upgrade all PeopleSoft Financial modules from version 9.0 to 9.1 to maintain tax and regulatory system support; from Legal to Information Management for NOV ad hoc reporting module and business process modeling; from District General to the Executive Office for costs related to the Signature Film; from Planning, Rules and Area Sources to Information Management for transportation database enhancements and maintenance on the R2202 computer system; and from District General to Legislative and Public Affairs for community outreach efforts and for the Surface Transportation contract modifications. Expenditures relating to budget increases and/or transfers follow Board-established policy regarding purchasing and contracting.

The attached list reflects actions taken by the Board during the FY 2011-12 which have increased the operating budget.

**BOARD-APPROVED FY 2011-12 BUDGET CHANGES**

<u>Date of Board Action</u>	<u>Budget Increases</u>	<u>Description</u>
July 2011	\$ 682,500	From the U.S. EPA – for the PM 2.5 Monitoring program (\$256,000); for the reallocation of Section 105, Year 19, PAMS program funds (\$312,000); for the reallocation of funds from the Community-Scale Air Toxics Monitoring program (\$39,000); and for the NATTS program (\$75,500).
July 2011	\$ 410,121	From the U.S. DHS – for the Enhanced Particulate Monitoring program.
July 2011	\$ 50,000	From the Clean Fuels Program Fund – to support the Clean Vehicle Outreach Project under the Clean Air Choices Program.
July 2011	\$ 600,000	From the Clean Fuels Program Fund – for technical assistance, expert consultation, public outreach and technical conference sponsorship, and advanced technology vehicle leases.
July 2011	\$ 300,000	From the Carl Moyer Program AB 923 Fund – to support administrative, outreach education and other directly related AB 923 activities.
July 2011	\$ 300,000	From the Prop 1B Goods Movement Fund – to support administrative and technical assistance and other directly related Prop 1B/Goods Movement activities.
July 2011	\$ 200,000	From the U.S. EPA – for development of greenhouse gas (GHG) reporting tools and GHG outreach assistance.
September 2011	\$ 30,000	From the Rule 1309.1 Priority Reserve Fund – to assist in implementing an enhanced AQMD “Mow Down Air Pollution 2011” program.
September 2011	\$ 58,880	From the Mobile Sources Air Pollution Reduction Fund – to facilitate reimbursement of administrative costs.

**BOARD-APPROVED FY 2011-12 BUDGET CHANGES Cont.**

<u>Date of Board Action</u>	<u>Budget Increases</u>	<u>Description</u>
October 2011	\$ 11,240	From the Undesignated Fund Balance – for post-production of five short regional videos that document the air quality challenges and success stories of AQMD’s major regions.
November 2011	\$ 242,000	From the Undesignated Fund Balance – for legislative and regulatory representation in Washington, D.C.
November 2011	\$ 150,000	From the Undesignated Fund Balance – for distribution of AQMD’s signature film “The Right to Breathe.”
November 2011	\$ 833,441	From the U.S. EPA – for the Section 105, Year 20, PAMS program funds.
November 2011	\$ 96,000	From the Undesignated Fund Balance – to feature air quality and “Check Before You Burn” reports on KTLA and KCBS TV morning weather segments.
November 2011	\$ 400,000	From the Designation for Facilities Refurbishing – to remediate the flood damage and restore the Hearing Board meeting room and adjacent conference rooms to operational condition.
November 2011	\$ 22,500	From Sponsorship Agreements – for the Air Quality and Transportation Conference.
December 2011	\$ 720,400	From the Clean Fuels Program Fund – to support the MATES IV Study.
December 2011	\$ 100,000	From the U.S. EPA – for a Pollution Prevention program contract expense.
February 2012	\$ 91,400	From the Clean Fuels Program Fund – for two Chevrolet Volt vehicles under AQMD’s Alternative Fuel Vehicle Demonstration Program.



**BOARD-APPROVED FY 2011-12 BUDGET CHANGES Cont.**

<u>Date of Board Action</u>	<u>Budget Increases</u>	<u>Description</u>
February 2012	\$ 83,500	From the Clean Fuels Program Fund – for the two-year lease of five low- and zero-emission vehicles under AQMD’s Alternative Fuel Vehicle Demonstration Program.
February 2012	\$ 250,000	From the Designation for Litigation and Enforcement – to contract with specialized legal counsel for defense assistance in lawsuits including those challenging Rule 1143, Rule 1315, the internal offset bank, and the CPV Sentinel power plant offsets, and a contempt proceeding brought by the railroads.
February 2012	\$ 150,000	From the Designation for Litigation and Enforcement – to contract with specialized legal counsel for defense assistance in litigation relating to the railroad rules.
April 2012	\$ 60,000	From the Air Quality Investment Fund – to assist in implementing AQMD’s “Mow Down Air Pollution 2012” Program.
April 2012	\$ 20,000	From the U.S. EPA Targeted Air Shed Grant – to assist in implementing the Yard Equipment Exchange Project.
April 2012	\$ 142,500	From the Undesignated Fund Balance – for the construction of the new platform at the Los Angeles Main Street monitoring site.
April 2012	\$ 344,409	From the Undesignated Fund Balance – for the redesign of the AQMD website and implementation of the Web Content Management System.
April 2012	\$ 200,000	From the Designation for Facilities Refurbishing – to replace two hot water boilers at AQMD headquarters.
April 2012	\$ 50,000	From the Undesignated Fund Balance – to purchase time on local TV/cable stations to air AQMD’s signature film.

**BOARD-APPROVED FY 2011-12 BUDGET CHANGES Cont.**

<u>Date of Board Action</u>	<u>Budget Increases</u>	<u>Description</u>
April 2012	\$ 30,000	From the Air Quality Investment Fund – for contracts to provide systems development, maintenance and support services.
April 2012	\$ 478,072	From the Undesignated Fund Balance – to fund labor contract agreements with TE and OCM groups and provide comparable monetary terms for non-represented employees.
June 2012	\$ 133,470	From the Undesignated Fund Balance – to amend contract for the continuation of the Air Quality Institute Program.
June 2012	\$ 23,100	From the Clean Fuels Program Fund – to lease BMW ActiveE vehicles under AQMD’s Alternative Fuel Vehicle Demonstration Program.
June 2012	\$ 50,000	From the Clean Fuels Program Fund – to support operations of the Clean Fuels Program.
	\$ 7,313,533	Total Board-approved FY 2011-12 Budget changes

**Sources of Funding:**

\$2,397,280	<i>Interfund Transfers</i>
\$2,268,562	<i>Grants/Contracts</i>
\$1,000,000	<i>Budget Designations</i>
\$1,647,691	<i>Undesignated Fund Balance</i>
<u>\$131,766,180</u>	FY 2011-12 Adopted Budget
<u>\$139,079,713</u>	FY 2011-12 Ending Budget

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 20

**PROPOSAL:** Status Report on Major Projects for Information Management Scheduled to Start During First Six Months of FY 2012-13

**SYNOPSIS:** Information Management is responsible for data systems management services in support of all AQMD operations. This action is to provide the monthly status report on major automation contracts and projects to be initiated by Information Management during the first six months of FY 2012-13.

**COMMITTEE:** Not Applicable

**RECOMMENDED ACTION:**  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

JCM:MAH:OSM:nv

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### **Background**

Information Management (IM) provides a wide range of information systems and services in support of all AQMD operations. IM's primary goal is to provide automated tools and systems to implement Board-approved rules and regulations, and to improve internal efficiencies. The annual Budget specifies projects planned during the fiscal year to develop, acquire, enhance, or maintain mission-critical information systems.

### **Summary of Report**

The attached report identifies each of the major projects/contracts or purchases that are expected to come before the Board between July 1 and December 31, 2012. Information provided for each project includes a brief project description, FY 2012-13 Budget, and the schedule associated with known major milestones (issue RFP/RFQ, execute contract, etc.).

### **Attachment**

Information Management Major Projects for Period July 1 through December 31, 2012

**ATTACHMENT**  
**September 7, 2012 Board Meeting**  
**Information Management Major Projects**  
**for the Period of July 1 through December 31, 2012**

<b>Item</b>	<b>Brief Description</b>	<b>Budgeted Funds</b>	<b>Schedule of Board Actions</b>	<b>Status</b>
Telecommunications Services	Select vendor(s) to provide local, long distance, internet, cellular services, and phone equipment maintenance for a three-year period.	\$750,000	Release RFP July 13, 2012; Award Contract(s) November 2, 2012	On Schedule
PeopleSoft and Oracle Software Support	Purchase PeopleSoft and Oracle software support maintenance for the integrated HR/Finance system.	\$238,800	Approve Sole Source Purchase July 13, 2012	Completed
Authorize Purchase of OnBase Software Support	Authorize the sole source purchase of OnBase software subscription and support for one year.	\$125,000	Approve Purchase July 13, 2012	Completed
Systems Maintenance and Enhancements	Provide enhancements for: <ul style="list-style-type: none"> <li>• CLASS System(s)</li> <li>• eGovernment Applications &amp; Infrastructure</li> <li>• Software Version Upgrades</li> <li>• PeopleSoft Upgrade</li> </ul>	\$429,200	September 7, 2012	On Schedule
Website Redesign and Content Management System	Purchase Content Management System (CMS) software and associated hardware.	\$210,000	Release RFP October 5, 2012	On Schedule
Systems Replacement	Initiate detail work planning for Systems Replacement: <ul style="list-style-type: none"> <li>• Stakeholder Vision Survey</li> <li>• Resource Procurement</li> <li>• Proof of Concept Prototyping</li> </ul>	TBD	November 2, 2012	On Schedule
Desktop Computer Hardware Upgrades	Authorize the purchase of desktop upgrades.	\$120,000	Authorize Purchase from Approved Vendors List November 2, 2012	On Schedule
CLASS Database Software Support	Purchase Ingres database software support and maintenance for the CLASS system.	\$169,000	Approve Sole Source Purchase November 2, 2012	On Schedule

Double-lined Rows - Board Agenda items current for this month

Shaded Rows - activities completed

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BOARD MEETING DATE: September 7, 2012

AGENDA NO. 21

PROPOSAL: Zero and Near-Zero Emission Technologies and Energy:  
Quarterly Report of Activities Related to Powering Future Vision

SYNOPSIS: This report describes key AQMD staff actions since April 2012 to seek implementation of zero and near-zero emission technologies and energy sources, as needed to attain federal air quality standards.

COMMITTEE: Not Applicable

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

BRW:PMG

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This report summarizes recent key activities of AQMD staff to seek development and deployment of zero and near-zero emission technologies and energy sources. In general, staff's efforts have been directed toward technology advancement, regional planning and projects, and public outreach. These actions are taken pursuant to AQMD's statutory responsibilities which include, among other things, duties to —

- establish an Office of Technology Advancement and adopt a program of activities to increase use of clean-burning fuels in the transportation and stationary source sectors, including a mandate to consider electricity (including electric vehicles) and fuel cells, in addition to natural gas and other fuels;<sup>1</sup>
- secure cooperation of public entities in implementing the regional air plan;<sup>2</sup> and

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<sup>1</sup> Health and Safety Codes § 40448.5.

<sup>2</sup> Health and Safety Code §40441; *see also* 40404.5 (duty to make efforts to incorporate solar energy into air plan).

- represent the citizens of the basin in influencing public and private decisions that impact air quality.<sup>3</sup>

The following are key activities undertaken from April to mid August 2012:

## **COLLABORATION, COMMENT AND ANALYSES REGARDING PROJECTS AND PLANNING**

**I-710 Project.** On June 29, Caltrans in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), the Gateway Cities Council of Governments, SCAG, the Ports of Los Angeles and Long Beach, and the Interstate 5 Joint Powers Authority, released the Draft EIR/EIS on the I-710 Corridor Project. The document evaluates proposals to improve the I-710 in Los Angeles County between Ocean Boulevard in Long Beach and State Route 60. Major project elements include widening the I-710 freeway up to ten general purpose lanes (five lanes in each direction); reconfiguring interchanges; and evaluating a potential additional separated four-lane freight corridor (two lanes in each direction). With support from AQMD, the Draft EIR/EIS includes two project alternatives under which the freight corridor would be dedicated to zero-emission trucks.

Caltrans and Metro held a series of public hearings on the Draft EIR/EIS in August to provide information and receive comments. AQMD staff testified at the hearings with preliminary views on certain issues. Staff's comments included the following points:

- AQMD staff supports inclusion of a zero-emission freight corridor as part of the proposed project because (1) the region will need broad deployment of zero and near-zero emission technologies, particularly for heavy duty trucks, in order to attain federal ozone standards, and (2) the Draft EIR/EIS shows significant cancer risk without a zero-emission freight corridor
- AQMD staff recommends that the lead agency (1) establish a schedule of actions for development of the zero-emission technologies and infrastructure, (2) make decisions regarding zero-emission technology and infrastructure well prior to commencement of construction in 2020 in order to send market signals to technology developers, and (3) establish mechanisms to ensure needed incentives, policies and/or requirements are in place at the time of commencement of operation.
- Coordinated action among agencies and stakeholders is needed and AQMD will continue to be partner in this effort.

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<sup>3</sup> Health and Safety Code §40412.

The time period for written comments on the Draft EIR/EIS ends September 28. Staff is preparing specific comments on the above issues and other matters related to the Draft EIR/EIS. AQMD staff has also continued its participation on advisory committees for the I-710 project.

**Zero-Emission Truck Technologies Reports.** AQMD and LA Metro co-funded preparation by CALSTART of a report titled, “*Technologies, Challenges & Opportunities I-710 Corridor Zero Emission Freight Corridor Vehicle Systems.*” The report was released in June and examines whether a Class 8 truck could be developed that would meet the zero-emission needs of the I-710 project alternatives described in the EIR/EIS. CALSTART prepared the report with input from a wide range of industry experts. Among the findings are the following:

“The development of a vehicle or vehicle system (truck and infrastructure power source) that can move freight through the I-710 Corridor with zero emissions has no major technological barriers. In fact, there are several technical approaches that can achieve the desired outcome. Solutions can be developed based on existing designs and technical knowledge, and require no fundamental research or technology breakthroughs. Small-scale demonstrations can begin immediately and commercialization of proven designs can certainly be achieved by 2035, the horizon year of the I-710 Corridor Project. Provided there is a strong focus on the commercialization process, this assessment finds commercial viability could occur well before 2035, indeed within the next decade.” (p.2)

The report noted an unprompted and “particularly striking” degree of consensus by experts around the most promising and commercially viable approaches. The report states:

“A ‘dual mode’ or ‘range extender’ Hybrid Electric Vehicle (HEV) with some EV-only capability was seen as the most feasible solution, particularly if combined with an infrastructure power source such as catenary or in-road, which would allow for smaller battery packs aboard the vehicles. Clarification and development of a sustainable overall economic and business case and corridor market mechanisms were seen as the most significant challenges to be overcome.” (p. 4, 7)

[http://www.metro.net/projects\\_studies/zero\\_emission/images/CALSTART\\_I-710\\_TCO\\_Report.pdf](http://www.metro.net/projects_studies/zero_emission/images/CALSTART_I-710_TCO_Report.pdf)

AQMD also funded and provided input to a study titled *Zero-Emission Catenary Hybrid Truck Market Study*. This study was prepared by Gladstein, Neandross & Associates and was released in late March, and presented at the ACT Expo in May. The study explores the potential market for zero-emission trucks, including hybrid electric trucks with all electric range, that receive wayside power, such as from overhead electric

catenary wires. Potential markets include the I-710, transport between the ports and near-dock railyards, and a potential east-west freight corridor. The report concludes that such technologies could provide standard operating range for local or regional trucks and could have similar or lower cost compared to other zero-emission technologies. [http://www.gladstein.org/tmp/ZETECH\\_Market\\_Study\\_FINAL\\_2012\\_03\\_08.pdf](http://www.gladstein.org/tmp/ZETECH_Market_Study_FINAL_2012_03_08.pdf)

**DOE Grant Application.** AQMD Technology Advancement Office Staff submitted an application for federal Transportation Investment Generating Economic Recovery (TIGER IV) grant from the Department of Energy (DOE) (DE-FOA-0000669). This grant was authorized by federal legislation previously supported by the District, and is intended to fund development and demonstration of zero-emission freight movement technologies. The solicitation was released March 20, 2012 and responses were due May 15, 2012. In preparing the application, AQMD staff worked with other agencies in the regional Zero Emission Truck Collaborative (described below). The application sought co-funding for (1) demonstration and testing of battery-electric and fuel cell heavy duty trucks built by several manufacturers, and (2) for the initial phase of a project to demonstrate wayside power for truck transport between the ports and the ICTF railyard. As of the date this board letter was drafted, staff has been informed that DOE intends to approve a \$4.2 million dollar award to SCAQMD for the battery electric and fuel cell truck projects. Staff continues to work to solidify cost share to pursue the wayside power truck demonstration.

**Los Angeles Countywide Zero Emission Truck Collaborative.** AQMD staff continued its participation in the Countywide Zero Emission Truck Collaborative established by LA Metro. The collaborative is intended to “catalyze the development and deployment of zero-emission trucks in Los Angeles County,” and includes the Ports of Long Beach and Los Angeles, Caltrans, SCAG, Gateway Cities COG and AQMD. Actions in recent months included input and coordinated support for the DOE grant application described above.

**Regional Transportation Plan.** On April 4, SCAG adopted the 2012 Update to Regional Transportation Plan which included provisions based on a joint proposal by AQMD and CARB staffs to develop and deploy zero and near-zero emission transport (described previous report).

## **AIR QUALITY PLANNING AND RELATED OUTREACH**

**Vision for Clean Air Report.** AQMD worked with staff from CARB and the San Joaquin Air Pollution Control District to jointly develop the report titled “*Vision for Clean Air: A Framework for Air Quality and Climate Planning.*” The report is a followup to the *Powering the Future* brochure and is intended to be a resource for future air plan amendments, and to spur public thought and comment regarding potential attainment strategies. The document was released in draft in late June and describes the latest information about emission reduction needs and certain technology options—



including zero and near-zero emission transportation technologies— to attain air quality standards and to comply with state legislation and executive orders committing to greenhouse gas emission reductions.

**AQMP.** In July, staff released the draft 2012 update to the Air Quality Management Plan. While targeted primarily toward PM<sub>2.5</sub> attainment, the draft plan also includes proposed near and mid-term measures to deploy zero and near-zero emission technologies that will be needed for ozone attainment.

## **TECHNICAL AND POLICY PRESENTATIONS AND TESTIMONY**

Staff activities included:

- Testimony at AB 118 Investment Advisory Committee public workshop regarding need for zero emissions goods movement funding (April 19)
- TAO presented at World EV Cities and Ecosystems at Los Angeles JW Marriott (May 6)
- EVS26: AQMD major sponsor and keynote speaker, Councilmember Jan Perry (May 7-9)
- 2012 ACT Expo at Long Beach Convention Center: moderated panel titled “*Powering Up: The Increasing Electrification of the Transportation Industry*” (May 15-17)
- TAO presented at EPA West Coast Collaborative in Seattle regarding *Powering the Future* and need for zero emission technologies (May 30)
- Presentation to the Chinese Academy of Governance on low carbon Transportation, new energy vehicles, clean fuel and low-carbon travel (May 30)
- Met with the Chinese Delegation regarding air quality challenges and the role of zero-emission technologies (June 5)
- Presentation at the California Marine and Intermodal Transportation System Advisory Council (CALMITSAC) meeting on locomotive emission controls and need for zero/near zero emission technologies (June 13)
- Long Beach City Council joint presentation with SCAG on zero emissions demonstration project proposal (June 19)
- AQMD DC Forum described below, including need for zero emissions technologies (June 20)
- Panelist at the AQMD/TRB Policy Forum on *Powering the Future: Moving to Cleaner Transportation and Energy Technologies* (June 21)

## **OUTREACH AND LEGISLATIVE ADVOCACY**

**Washington DC Forum.** On June 21, AQMD hosted the *Moving to Cleaner Transportation and Energy Technologies Forum* aimed at focusing policymakers’ attention on the convergence of advanced transportation and energy technologies to clean the air, improve public health, increase our nation's energy security and create

jobs. The forum featured a morning keynote followed by two panels that discussed the technical and policy issues involved with moving toward clean transportation and energy technologies. Speakers and panel members included Congressional members as well as technology experts.

**Other Presentations and Outreach.** AQMD Public Affairs staff also engaged in outreach to various organizations, governments and elected officials regarding electric infrastructure and zero and near-zero emissions technologies. These included the following:

*Organizations/Governments*

- 5 Mountain Communities
- Alhambra/Rosemead Chambers of Commerce
- Arrowhead Regional Medical Center
- Big Bear Chamber of Commerce
- Center for Community Action and Environmental Justice
- Children's Hospital of Orange County
- City of Alhambra
- City of Beverly Hills
- City of Big Bear
- City of Claremont
- City of Corona
- City of Fontana
- City of La Canada Flintridge
- City of Montclair
- City of Monterey Park
- City of Murrieta
- City of Ontario
- City of Pomona
- City of Rancho Cucamonga
- City of Redlands
- City of Riverside
- City of Temecula
- City of Upland
- Coachella Valley Association of Governments
- County of San Bernardino
- Friends of the Pacific Trail
- Inland Action
- Inland Congregations United for Change
- Inland Empire Air Quality Committee
- Inland Empire Resource Conservation District
- International Brotherhood of Electrical Workers
- Las Virgenes Malibu Council of Governments

- Lewis Homes
- Loma Linda Chamber of Commerce
- Los Angeles County Sanitations District
- Metro
- Moreno Valley Chamber of Commerce
- National Electrical Contractors Association
- Omnitrans
- Orange County Council of Governments
- Orange County Green Chamber of Commerce
- Pacific High School
- Pasadena Chamber of Commerce
- Redlands Chamber of Commerce
- Riverside Chamber of Commerce
- Riverside Transit Agency
- Sammons Trucking
- San Bernardino Associated Governments
- San Bernardino Chamber of Commerce
- San Bernardino Community Hospital
- San Gabriel Valley Council of Governments
- San Gabriel Valley Economic Partnership
- San Gorgonio High School
- South Orange County Economic Coalition
- Specialty Equipment Market Association (SEMA)
- U.S. Green Building Council
- Upland Chamber of Commerce
- VOICE Environmental Group
- Western Metropolitan Water District
- Western Riverside Council of Governments

*Events*

- AB 1318 Office Hours – Desert Hot Springs
- AB 1318 Office Hours – La Quinta
- AB 1318 Office Hours – Mecca
- AB 1318 Office Hours – Palm Desert
- ACT Expo
- Alhambra Eco-Fair
- All Saints Church Earth Day Celebration
- Annual Capitol Briefing - Sacramento
- Arrowhead Regional Medical Center 5K Health and Fitness Expo
- Beverly Hills Earth Day
- Breathmobile Open House
- California Contract Cities Association
- CCAEJ Inland Empire Air Quality Summit
- CHOC Air Power Games

- City of Pomona Public Works Week Open House
- Corona State of the City Address
- Cucamonga Challenge
- EVS26
- Greater Riverside Chambers of Commerce Small Business Expo
- Greenest Fastest Mile
- Highland Citrus Festival
- Los Angeles County Sanitations District Earth Day
- Metro Expo Line Grand Opening
- Monterey Park Earth Day Festival
- Newhart Middle School Earth Day
- Orange Coast College Green Coast Day
- Redlands Senior Health and Fitness Fair
- Riverside Transit Agency's 35th Anniversary
- San Bernardino Community Hospital Earth Day
- SANBAG City County Conference
- Seal Beach Naval Weapons Center - Sustainability Faire
- STEM Service Learning Institute
- Temecula State of the City Address
- Western Metropolitan Water District Earth Night in the Garden

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BOARD MEETING DATE: September 7, 2012

AGENDA NO. 23

REPORT: Administrative Committee

SYNOPSIS: The Administrative Committee met on Friday, July 20, 2012. The Committee discussed various issues detailed in the Committee report. The next Administrative Committee meeting is scheduled for Friday, September 14, 2012, which begins at 10 a.m. in CC-8.

RECOMMENDED ACTION:  
Receive and file.

Dr. William A. Burke, Chair  
Administrative Committee

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**Attendance:** Attending the July 20, 2012, meeting via VT was Committee Member William Burke. Committee Members Supervisor Josie Gonzales and Mayor Dennis Yates attended at AQMD headquarters, while Mayor Ron Loveridge was absent due to a conflict in his schedule.

**ACTION/DISCUSSION ITEMS:**

1. **Board Members' Concerns:** None.
2. **Chairman's Report of Approved Travel:** Dr. Wallerstein mentioned that Dr. Joseph Lyou and Dr. Clark E. Parker, Sr. were participating at CCEEB's Summer Issues Seminar in Olympic Valley, CA on July 16-19, 2012; and Dr. Clark E. Parker, Sr. was attending the CaFCP Steering Team meeting in Sacramento, CA on October 8-10, 2012.

3. **Approval of Compensation for Board Member Assistant(s)/Consultant(s):** None.
4. **Report of Approved Out-of-Country Travel:** None.
5. **Pre-audit Conference:** Michael O’Kelly, Chief Financial Officer, introduced Brainard and Melba Simpson, Simpson & Simpson, CPAs, who explained that the purpose of their presence was to introduce themselves and summarize the financial statement audit that they will be performing over the next few months for Fiscal Year 2011-12. It was indicated that Melba Simpson will be the audit partner in charge of the engagement. Mrs. Simpson stated that the audit will be conducted in accordance with applicable auditing standards and will include the federal Single Audit. She also stated that the purpose of the audit will be to render an opinion on the accuracy of the AQMD’s financial statements. As part of the audit process, Mrs. Simpson indicated that they will be interviewing the Audit Committee members to determine if there are any specific areas the members would like the auditors to focus on while conducting the audit.

**SEPTEMBER AGENDA ITEMS:**

6. **Report of RFPs and RFQs Scheduled for Release in September:** Mr. O’Kelly, stated that one RFP – Proposal for Janitorial Services at Diamond Bar Headquarters – was being scheduled.

Moved by Gonzales; seconded by Yates; unanimously approved.

7. **Appoint Alternate Engineer Member to AQMD Hearing Board:** Denise Pupo, Senior Deputy Clerk/Clerk of the Boards, stated this item is to appoint a Hearing Board alternate engineer member. The Advisory Committee interviewed candidates at its meeting on March 28, 2012, and made its recommendation to the Administrative Committee. The Administrative Committee interviewed candidates at its meeting on May 11, 2012, and decided not to recommend either of the two candidates interviewed, but to continue the item to a subsequent meeting and interview additional individuals from the pool of qualified engineer member/alternate candidates.

The Committee members conducted the interviews, and recommended Thomas J. McCabe, Jr. as the engineer member alternate for FY 2012-15.

Moved by Gonzales; seconded by Yates; unanimously approved.

8. **Award Contracts to Local Radio Station Affiliations for Year-Round Media Partnership Featuring Daily Air Quality Reports**

*This item has been postponed to the September 14<sup>th</sup> Administrative Committee meeting.*

9. **Execute Contract for One-Year TV Partnership:** Mr. Atwood explained that staff is requesting the Committee's approval to select a contractor to partner with AQMD in promoting public awareness of air quality and Check Before You Burn forecasts, an effort that began in 2010. He continued that the Board has allocated \$150,000 for this program for the year with four proposals received from CBS/KCAL, KABC, KNBC and KTLA.

Mr. Atwood also mentioned that AQMD's Draft 2012 AQMP will be released this week, including a proposal to enhance the agency's Check Before You Burn program. Public outreach will be critical to the success of this program, he said.

Dr. Burke stated that in the future the normal criteria used to evaluate the RFPs for this type of service should be set by the Administrative Committee. Dr. Wallerstein mentioned that one bid was deemed a small business and therefore received 10 additional points on their score; however, the Board has the discretion to override the scores based on the interest of the agency and the public.

After reviewing the proposal information received, Mr. Atwood suggested that KABC be selected as they would provide 722 million viewing impressions over a 12-month period, which would also include the air quality index and Check Before You Burn Program. Mayor Yates mentioned that it should be the media stations' civic and moral duty to broadcast the information without receiving compensation for it.

There was additional discussion about potential emcees for the annual Clean Air Awards event.

Moved by Gonzales; seconded by Yates; unanimously approved.

10. **Amend Contract for Policy Consultation Regarding Local, State and Federal Transportation Issues**

Moved by Yates; seconded by Gonzales; unanimously approved.

11. **Recommend to Appoint Member to AQMD Environmental Justice Advisory Group**

Moved by Yates; seconded by Gonzales; unanimously approved.

12. **Issue RFP for Replacement of Heating, Ventilation, and Air Conditioning Black Steel Piping at AQMD Headquarters**

Public Comment: Rita Loof, Radtech International, asked where the material was being manufactured and what type of environmental footprint was going to occur, along with what type of coatings would be used for the piping at headquarters.

Moved by Yates; seconded by Gonzales; unanimously approved.

14. **Amend Contracts to Provide Short- and Long-Term Systems Development, Maintenance and Support Services**

Moved by Yates; seconded by Gonzales; unanimously approved.

15. **Review September 7, 2012 Governing Board Agenda**

Moved by Yates; seconded by Gonzales; unanimously approved.

16. **Other Business:** None.

17. **Public Comment:** None.

Meeting adjourned at 11:33 a.m.



[↑ Back to Agenda](#)

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 24

REPORT: Legislative Committee

SYNOPSIS: The Legislative Committee held a meeting on Friday, July 20, 2012. The next Legislative Committee is scheduled for Friday, September 14, 2012 at 9 a.m. in Conference Room CC8. The Committee deliberated on agenda items for Board consideration and recommended the following action:

Agenda Item	Recommended Position
AB 972 (Butler) Oil and Gas; Hydraulic Fracturing: Moratorium	WATCH

**RECOMMENDED ACTION:**

Receive and file this report, and approve agenda items as specified in this letter.

Josie Gonzales, Chair  
Legislative Committee

DJA:WS:DM

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**Attendance [Attachment 1]**

The Legislative Committee met on July 20, with Committee Chair Supervisor Josie Gonzales in attendance at AQMD Diamond Bar headquarters and Committee Members Supervisor Michael Antonovich, Councilwoman Judy Mitchell, and Dr. Clark Parker participating via videoconference.

## **Update on Federal Legislative Issues**

Mark Kadash and Chris Kierig, AQMD federal legislative consultants, reported that the President has signed the federal Surface Transportation Reauthorization bill. Mr. Kadash reported that the Department of Energy is now in the process of reviewing the grant applications for zero-emissions good movement projects, and expect the grant award to be made next month. He also said that Congress will be gone for most of August, and will be in session for only a few days in September, and then will go out in early October.

The consultants also reported that the House continues to work through its appropriation bills and will need a continuing resolution of current funding levels to keep the government funded through the rest of the year. In the time left, Congress still has to address the “fiscal cliff,” a one-trillion dollar spending cut scheduled – half for defense spending and half for non-defense discretionary spending. Congress will also be addressing the expiration of a number of tax breaks, including the income tax rates for all individuals, but that may have to wait until November or early December.

Supervisor Gonzales offered to work with staff and engage with Senator Feinstein on behalf of the District. At minimum, she would like a letter drafted on her behalf as Chair of the Legislative Committee to raise AQMD concerns and link it to her recent successful visit with the Senator.

Joshua Andrews, AQMD federal legislative consultant, reported that the recent passage of the Surface Transportation bill provides reauthorizations of a number of key highway programs; however, it is a shorter extension than what is traditionally done, which will require Congress to revisit these issues in 2013. Transportation & Infrastructure Committee Chairman John L. Mica (R-FL) also expressed a desire to move rail legislation before the end of this year. Mr. Andrews reported that his firm has reached out to Reps. Napolitano and Richardson, on behalf of AQMD, to be kept aware of any activity so that efforts can continue to try and incorporate AQMD’s priorities should legislation move.

The House Energy & Commerce Committee held a series of hearings focused on renewable and alternative fuels. The primary focus was the Renewable Fuel Standard (RFS) with an additional focus on the use of natural gas, electrification and legislation to mandate the production of flexible fuel vehicles capable of running on higher levels of ethanol/methanol or other “alternatives.” The Senate is also gearing up for an examination of federal fuel policies with the formation of the RFS Study Group – a bi-partisan group of Senators – who will be hosting listening sessions with stakeholders from industry, academia and others to hear what changes need to be made to this policy.

Also, the House continues to express concerns over the U.S. EPA’s upcoming Clean Air

Act regulations and is expected to pass a bill placing a moratorium on any new U.S. EPA regulations.

### **Update on Sacramento Legislative Issues**

Paul Gonsalves, AQMD state legislative consultant, reported on the status of the State's budget. He reported that this year's \$91.3 billion budget addresses a \$15 billion budget deficit and leaves the State with nearly one billion in reserves, though it relies heavily on the Governor's November tax initiative passing. The Governor's tax initiative proposes a seven-year income tax increase on high-income Californians and a ¼ cent sales tax increase for four years. The Department of Finance believes the tax initiative will net the State \$8.5 billion annually. However, the Legislative Analyst's Office believes the Governor's tax initiative will only net the State about \$6.8 billion annually.

Mr. Gonsalves noted that so far there are no impacts on AQMD's subvention or any other air quality funding. However, if the Governor's tax initiative does not pass, all programs are potentially subject to cuts. Presently, the \$6 billion in budget trigger cuts include:

- \$5.4 billion cut to K-12 and Community Colleges
- \$250 million cut to UC and CSU respectively
- \$50 million reduction to Developmental Services
- \$20 million cut to City Police Grants
- \$10 million cut to Department of Forestry and Fire Protection
- \$6.6 million cut to Flood Control
- \$5 million cut to Local Water Safety Patrol
- \$2.5 million cut to Fish and Game
- \$1.4 million cut to Park Lifeguards
- \$2.1 million in additional reductions

Mr. Gonsalves also reported that the Legislature has held numerous Joint Legislative Conference hearings to address the pension problems in the state. The legislative leadership attempted to broker a deal before summer recess; however, negotiations with the Governor fell apart. No language has been circulated for review. Nevertheless, Senator Steinberg has publicly recommitted to reaching an agreement on pension reform by the August 31, 2012, end of session deadline. The conventional wisdom in the Capitol is that if the Legislature does not reach an agreement soon, the voters will vote for more drastic reforms.

In regard to greenhouse gases, one of the budget trailer bills signed by Governor Brown (AB 1018) included a last-minute amendment directing up to 15% of investor-owned utilities' cap-and-trade auction revenues to clean-energy and energy-efficiency projects.

Utilities and business groups are organizing a strong push to fight this new statute, arguing that CARB had already agreed that cap-and-trade revenues would go back to ratepayers to offset the cost of AB 32 implementation. The first auction is scheduled for November and it is anticipated that as much as \$1 billion will be raised.

Committee Members Supervisor Antonovich and Supervisor Gonzales noted that the Sacramento ‘budget tightening’ process has not resulted in the loss of a single staff position at the State level. In response to an inquiry from Dr. Parker, Executive Officer Barry Wallerstein explained that no cut has been identified that would impact air quality; however, if the Governor’s tax initiative does not pass or the budget deficit otherwise grows, all items are subject to reconsideration for future cuts. Dr. Wallerstein further informed the Committee that the current polling data is not promising for the Governor’s initiative.

### **Overview of the New Federal Surface Transportation Authorization Law, MAP-21**

Mr. Marc Carrel, Program Supervisor for AQMD’s Office of Legislative & Public Affairs (L&PA), provided the Committee an overview of the recently enacted federal surface transportation reauthorization law know as MAP-21. He reported that on Friday, June 29, 2012, Congress approved HR 4348, titled Moving Ahead for Progress in the 21st Century (known as MAP-21) a \$105 billion federal transportation reauthorization bill enacted for 27 months, through September 30, 2014.

The funding is split 79.8% for highways and 20.2% for transit (vs. the current 81.2%—18.8% split). The highway program is restructured by eliminating or consolidating approximately 60 programs with much of the funding going to four core formula programs. He also stated that the MAP-21 law is \$4 billion less than the Senate approved bill (SB 1813) but more than the House bill (HR 7) recommended. There is no change to programs for the remainder of Fiscal Year 2012 (through September 30th). Program changes take effect in Fiscal Year 2013 and the funding is at current levels. There is a 1.4% increase for Fiscal Year 2014.

The Highway Trust Fund is not adequate to pay for the \$105 billion bill, and the bill includes a transfer of \$18.8 billion from pension reform and the Underground Storage Tank Trust Fund to the Highway Trust Fund over the life of the bill. Therefore, there is no long-term fix for the Highway Trust Fund imbalance. While the bill gives Congress until September 30, 2016, to resolve the funding problem, the Congressional Budget Office (CBO) estimates that the HTF’s Highway and Transit Accounts will face new deficits starting in FY 2015.

Some of the specific provisions included for the first time in the surface transportation bill, which are of importance to the District include:

- Priority consideration for PM2.5 nonattainment areas.

- Allows, but does not mandate, Congestion Mitigation and Air Quality (CMAQ) funds for clean construction equipment.
- CMAQ performance plans for nonattainment areas with populations over one million to identify air quality and traffic congestion reduction targets and how project will contribute towards achieving those targets.
- Evaluation of CMAQ projects in terms of cost effectiveness.
- Incentives for states that fund projects to improve freight movement.
- National Freight Strategic Plan that must include, among other items, best practices to mitigate impacts of freight movement on communities.
- State and local entity eligibility to enter into contracts with USDOT to carry out research and development projects.
- In ozone or carbon monoxide nonattainment or maintenances areas, public transportation agencies can receive grants to deploy zero-emission or low-emission buses or bus infrastructure.

Supervisor Gonzales expressed her concern over the multiple projects – HOT lanes, truck lanes, 710 freeway extension, high-speed rail, etc. – being proposed given the limited resources available for transportation infrastructure. In response, Dr. Wallerstein explained that staff has been wrestling with the issue of assessing the best use of limited public funds given potential co-benefits for the environment and the economy. Dr. Wallerstein proposed that staff further study the issue and bring it back to the Board for direction.

**Recommend Position of the Following State Bill [Attachment 2]**

Mr. William Sanchez, Senior Public Affairs Manager for L&PA, briefed the Committee on the following state bill.

**AB 972 (Butler) Oil and Gas: Hydraulic Fracturing: Moratorium**

AB 972 prohibits the Division of Oil, Gas and Geothermal Resources (DOGGR) from approving any permit where hydraulic fracturing treatments are to be used until regulations governing hydraulic fracturing treatments are **adopted** by the Division **and have taken effect**. The bill reflects the Legislature’s frustration with DOGGR’s failure to impose any reporting or permitting requirements on hydraulic fracturing despite its clear regulatory authority to do so.

Mr. Sanchez explained that this approach may protect the public health by preventing unregulated fracturing activities that cause emissions of VOC’s, carcinogens and methane within the South Coast region. However, if the author’s intent is to ensure that comprehensive regulations are in place, the bill could simply mandate DOGGR to adopt regulations. Staff recommended that the Committee establish a position to recommend to the Governing Board.

Dr. Wallerstein further explained that, given the requirement that the regulations be adopted and have taken effect, the bill places an extraordinarily high burden given the endless potential for litigation and could result in unintended consequences.

Consequently, Dr. Wallerstein recommended a WATCH position. In response to an inquiry from Dr. Clark regarding the value of a “watch” position as compared to no position, Dr. Wallerstein explained that given the Board’s expressed interest in the subject matter he would have been remiss if he did not share this item with the Legislative Committee, giving the Committee and the Board an opportunity to give direction on the item.

***The Legislative Committee adopted a WATCH position on AB 972 to recommend to the Governing Board.***

**Issue RFP for Legislative Representation in Washington D.C. #7961**

Mr. Derrick Alatorre, Assistant Deputy Executive Officer for L&PA, briefed the Committee on issuing a Request for Proposal (RFP) for legislative consulting services in Washington D.C. He stated that the AQMD currently has two contracts for legislative representation in Washington, D.C. One will expire on December 31, 2012, and the other expires on January 14, 2013. Mr. Alatorre explained that the AQMD nevertheless continues to require representation in Washington D.C. to ensure that AQMD remains effective in air quality legislation and to maximize our opportunities to secure funding. The District is a national leader in air quality innovation and it is important for us to contribute to the national policymaking debate.

Therefore, staff recommended the Committee’s support to approve issuance of an RFP to solicit proposals for legislative consulting services in Washington D.C. The initial funding amount for this RFP would be \$225,500 with two one-year options to renew, contingent upon satisfactory performance, and approval of subsequent budgets at the Board’s discretion.

Supervisor Gonzales asked whether there was an interest in hiring a second federal legislative consultant to have solid representation with members of both parties. Dr. Wallerstein explained that in the past the Board had elected to hire two firms and augment the funding accordingly for that reason. By issuing the RFP the Committee and the Board would have the opportunity to interview the top-ranked firms and at that time decide whether it wishes to contract with one or two firms.

***The Legislative Committee supported recommending to the Board to issue an RFP for legislative consulting service in Washington D.C. Please refer to the September 7, 2012 Board Agenda item #4 for additional information on this item.***

**Report from AQMD Home Rule Advisory Group [Attachment 3]**

Please refer to Attachment 3 for written report.

**Other Businesses:** None

**Public Comment Period:** None

**Attachments**

1. Attendance Record
2. Recommended Positions on State Bills
3. Home Rule Advisory Committee Report

## **Attachment 1**

### **ATTENDANCE RECORD – July 20 2012**

#### **DISTRICT BOARD MEMBERS:**

Josie Gonzales, Committee Chair  
Michael D. Antonovich  
Judy Mitchell  
Clark E. Parker, Ph.D.

#### **STAFF TO COMMITTEE:**

Derrick Alatorre, Assistant Deputy Executive Officer/Public Advisor  
William Sanchez, Senior Public Affairs Manager  
Julie Franco, Senior Administrative Secretary

#### **DISTRICT STAFF:**

Barry Wallerstein, Executive Officer  
Barbara Baird, District Counsel  
Elaine Chang, Deputy Executive Officer  
Peter Greenwald, Senior Policy Advisor  
Henry Hogo, Assistant Deputy Executive Officer  
Marc Carrel, Program Supervisor  
Philip Crabbe, Community Relations Manager  
David Madsen, Senior Public Information Specialist  
Lauren Nevitt, Deputy District Counsel II  
Veera Tyagi, Senior Deputy District Counsel  
Patti Whiting, Staff Specialist  
Paul Wright, Audio Video Specialist

#### **OTHERS PRESENT:**

Mark Abramowitz, Board Member Assistant (Lyou)  
Greg Adams, LACSD  
Josh Andrews, Faegre, Baker, Daniel Consulting  
Brad Buzil  
Kris Flaig, City of Los Angeles  
Paul Gonsalves, Gonsalves & Son (teleconference)  
Sue Gornick, BP  
Bill LaMarr, California Small Business Alliance  
Mark Kadash, Kadash & Associates  
Chris Kierig, Kadash & Associates  
Rita Loof, RadTech  
Max Pike, CEA Consulting  
David Rothbart, LACSD  
Steve Schuyler, BIASC  
Lisha Smith, Board Member Assistant (Gonzales)  
Warren Weinstien, Kadash & Associates  
Lisa Woolevy



## **Attachment 2**

### **AB 972 (Butler)**

#### **Oil and gas: hydraulic fracturing: moratorium.**

**Summary:** No notice of intention to commence drilling shall be approved for any well where a hydraulic fracturing treatment will be used or is planned to be used in completing the well until regulations governing hydraulic fracturing treatments are adopted by the division and have taken effect. The hydraulic fracturing treatment regulations shall be comprehensive and ensure that the integrity of the well and well casing are maintained.

**Background:** Under existing law, the Division of Oil, Gas, and Geothermal Resources (DOGGR) in the Department of Conservation regulates the drilling, operation, maintenance, and abandonment of oil and gas wells in the state. The State Oil and Gas Supervisor supervises the drilling, operation, maintenance, and abandonment of wells and the operation, maintenance, and removal or abandonment of tanks and facilities related to oil and gas production within an oil and gas field regarding safety and environmental damage. Existing law requires a well operator, before commencing the work of drilling the well, to obtain approval from the State Oil and Gas Supervisor or a district deputy.

Currently DOGGR does not track hydraulic fracturing activities; thus the full extent of its use is unknown. However, according to oil and gas industry experts, hydraulic fracturing has been used in California for several decades. Wells in Kern, Ventura, Santa Barbara and Los Angeles Counties, and potentially other counties have been hydraulically fractured. Industry reports suggest that hydraulic fracturing will most likely increase statewide. The Monterey shale formation, which stretches from Northern to Southern California, is receiving increasing attention. Several oil companies have purchased leases covering several hundreds of thousands of acres to drill the Monterey shale. According to industry experts and a 2008 Society of Petroleum Engineers (SPE) article, hydraulic fracturing has potential to increase output from many Northern California gas reservoirs including gas sands. If these investments produce positive returns, the state could see a proliferation of hydraulic fracturing operations in the near future. However, at least one drilling location in Monterey County has already generated significant community concern and opposition.

On February 16, 2011, in reply to an inquiry from Senator Pavley the DOGGR supervisor acknowledged that DOGGR had no reliable information on the extent of hydraulic fracturing activities in California and has imposed no reporting or permitting requirements on the practice despite the clear regulatory authority to do so. Recently the Western States Petroleum Association (WSPA), based upon voluntary reporting by its members, reported that at least 628 new and existing oil and gas wells were hydraulically fractured in California in 2011, of approximately 2,300 new wells drilled that year and more than 50,000 existing wells. Counties where wells have been hydraulically fractured include Kern, Ventura, Santa Barbara, Los Angeles, and Monterey.

Other states, including New York, Vermont and New Jersey have established some form of fracking moratorium or ban due in part to public health concerns. In California, the

## **Attachment 2**

DOGGR has not exercised its authority to either regulate or collect data on hydraulic fracturing treatments. However, in March it issued a formal notice to well operators asking for voluntary reporting of fracking data and announced that an independent scientific study on fracking in California will be conducted. The department's director has further committed to produce draft fracking regulations towards the end of the summer with the intent of having fracking regulations in place by the end of 2012.

**Status:** 7/2 referred to Senate Appropriations

**Specific Provisions:** This bill would:

- 1) Provide that "Hydraulic fracturing" means a well stimulation treatment used in completing a well that typically involves the pressurized injection of hydraulic fracturing fluid and proppant from the well into an underground geologic formation in order to fracture the formation, thereby causing or enhancing, or intending to cause or enhance, for the purposes of this division, the production of oil or gas from a well. Alternate terms include, but are not limited to "fracking," "hydrofracking," and "hydrofracturing."
- 2) Provide that no notice of intention to commence drilling shall be approved for any well where a hydraulic fracturing treatment will be used or is planned to be used in completing the well until regulations governing hydraulic fracturing treatments are adopted by the division and have taken effect.
- 3) Provide that hydraulic fracturing treatment regulations shall be comprehensive and ensure that the integrity of the well and well casing are maintained.

**Impacts on AQMD's Mission, Operations or Initiatives:** The U.S. EPA reports that air quality impacts in areas with active natural gas development include increased emissions of volatile organic compounds (VOCs), hazardous air pollutants, and methane. Further, the EPA recently issued regulations that for the first time will curtail air pollution from natural gas wells that use the controversial production technique known as hydraulic fracturing, or fracking. The regulations will limit emissions of VOC's, carcinogens and methane. Much of the air pollution at gas sites escapes after the well is drilled but before it is linked to pipelines to take the gas to processing plants and closer to market. A recent study by the Colorado School of Public Health indicated that air pollution may contribute to "acute and chronic health problems for those living near natural gas drilling sites."

This approach may protect the public health by preventing unregulated fracturing activities that cause emissions of VOC's, carcinogens and methane within the South Coast region. Such activities could then resume once state regulatory protections are put in place.

## **Attachment 2**

However, if the author’s intent is to ensure that comprehensive regulations are in place, the bill could simply mandate DOGGR to adopt regulations.

Note: The moratorium will take up to a year to take full effect. Well permits are valid for one year from the issue date (PRC §3203). Therefore, any permits issued this year will be valid for at least some portion of next year.

**Recommended Action: Establish position to recommend to the Board.**

**SUPPORT:** Councilmember Paul Koretz, City of Los Angeles  
Supervisor Mark Ridley-Thomas, Board of Supervisors  
County of Los Angeles

**OPPOSITION:** California Chamber of Commerce  
California Construction Trucking Association  
California Independent Oil Marketers Association  
California Manufacturers & Technology Association  
California Small Business Alliance  
Coalition of Energy Users  
Friends for Saving California Jobs  
Independent Oil Producers Agency  
Kern County Taxpayers Association  
Western States Petroleum Association

AMENDED IN SENATE JUNE 28, 2012  
AMENDED IN SENATE JUNE 13, 2012  
AMENDED IN SENATE AUGUST 15, 2011  
AMENDED IN SENATE JUNE 29, 2011  
AMENDED IN SENATE JUNE 15, 2011  
AMENDED IN ASSEMBLY APRIL 13, 2011

CALIFORNIA LEGISLATURE—2011–12 REGULAR SESSION

**ASSEMBLY BILL**

**No. 972**

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**Introduced by Assembly Member Butler**

February 18, 2011

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*An act to amend Section 3203 of, and to add Sections 3017 and 3203.5 to, 3017.1, 3017.2, and 3017.3 to, the Public Resources Code, relating to oil and gas.*

LEGISLATIVE COUNSEL'S DIGEST

AB 972, as amended, Butler. Oil and gas: hydraulic fracturing: moratorium.

Under existing law, the Division of Oil, Gas, and Geothermal Resources in the Department of Conservation regulates the drilling, operation, maintenance, and abandonment of oil and gas wells in the state. The State Oil and Gas Supervisor supervises the drilling, operation, maintenance, and abandonment of wells and the operation, maintenance, and removal or abandonment of tanks and facilities related to oil and gas production within an oil and gas field regarding safety and environmental damage. Existing law requires an operator of a well,

before commencing the work of drilling the well, to obtain approval from the State Oil and Gas Supervisor or a district deputy.

This bill would, until regulations governing hydraulic fracturing have been adopted, prohibit the supervisor and the district deputy from approving the drilling of a well in which hydraulic fracturing, as defined, is used or is proposed to be used in the production of oil and gas. *This bill would define, among others, the terms hydraulic fracturing fluid and proppants.*

Vote: majority. Appropriation: no. Fiscal committee: yes. State-mandated local program: no.

*The people of the State of California do enact as follows:*

1 SECTION 1. Section 3017 is added to the Public Resources  
2 Code, to read:

3 ~~3017. “Hydraulic fracturing,” “fracking,” “hydrofracking,”~~  
4 ~~“hydrofracturing,” and “unconventional shale drilling” means a~~  
5 ~~technique used in preparing a well that typically involves the~~  
6 ~~pressurized injection of water and a mix of chemicals, compounds,~~  
7 ~~and materials into an underground geologic formation in order to~~  
8 ~~fracture the formation, thereby causing or enhancing, for the~~  
9 ~~purposes of this division, the production of oil or gas from a well.~~

10 3017. “Hydraulic fracturing” means a well stimulation  
11 treatment used in completing a well that typically involves the  
12 pressurized injection of hydraulic fracturing fluid and proppant  
13 from the well into an underground geologic formation in order to  
14 fracture the formation, thereby causing or enhancing, or intending  
15 to cause or enhance, for the purposes of this division, the  
16 production of oil or gas from a well. Alternate terms include, but  
17 are not limited to “fracking,” “hydrofracking,” and  
18 “hydrofracturing.”

19 SEC. 2. Section 3017.1 is added to the Public Resources Code,  
20 to read:

21 3017.1. “Hydraulic fracturing fluid” means a base fluid mixed  
22 with physical and chemical additives, including proppants, for the  
23 purpose of hydraulic fracturing. Additives may be of any phase.  
24 A hydraulic fracturing treatment may include more than one  
25 hydraulic fracturing fluid.

26 SEC. 3. Section 3017.2 is added to the Public Resources Code,  
27 to read:

1 3017.2. “Base fluid” is a continuous phase liquid or gas used  
2 to transmit pressure to the underground geologic formation.

3 SEC. 4. Section 3017.3 is added to the Public Resources Code,  
4 to read:

5 3017.3. “Proppants” mean materials inserted or injected into  
6 the underground geologic formation that are intended to prevent  
7 fractures from closing.

8 SEC. 5. Section 3203 of the Public Resources Code is amended  
9 to read:

10 3203. (a) The operator of any well, before commencing the  
11 work of drilling the well, shall file with the supervisor or the district  
12 deputy a written notice of intention to commence drilling. Drilling  
13 shall not commence until approval is given by the supervisor or  
14 the district deputy. If the supervisor or the district deputy fails to  
15 give the operator written response to the notice within 10 working  
16 days from the date of receipt, that failure shall be considered as  
17 an approval of the notice, *except as provided for in subdivision*  
18 *(d)*, and the notice, for the purposes and intents of this chapter,  
19 shall be deemed a written report of the supervisor. If operations  
20 have not commenced within one year of receipt of the notice, the  
21 notice shall be deemed canceled. The notice shall contain the  
22 pertinent data the supervisor requires on printed forms supplied  
23 by the division or on other forms acceptable to the supervisor *and*  
24 *shall indicate if a hydraulic fracturing treatment will be used or*  
25 *is planned to be used in completing the well.* The supervisor may  
26 require other pertinent information to supplement the notice.

27 (b) After the completion of any well, this section also applies  
28 as far as may be, to the deepening or redrilling of the well, any  
29 operation involving the plugging of the well, or any operations  
30 permanently altering in any manner the casing of the well. The  
31 number or designation of any well, and the number or designation  
32 specified for any well in a notice filed as required by this section,  
33 shall not be changed without first obtaining a written consent of  
34 the supervisor.

35 (c) If an operator has failed to comply with an order of the  
36 supervisor, the supervisor may deny approval of proposed well  
37 operations until the operator brings its existing well operations  
38 into compliance with the order. If an operator has failed to pay a  
39 civil penalty, remedy a violation that it is required to remedy to  
40 the satisfaction of the supervisor pursuant to an order issued under

1 Section 3236.5, or to pay any charges assessed under Article 7  
2 (commencing with Section 3400), the supervisor may deny  
3 approval to the operator’s proposed well operations until the  
4 operator pays the civil penalty, remedies the violation to the  
5 satisfaction of the supervisor, or pays the charges assessed under  
6 Article 7 (commencing with Section 3400).

7 *(d) (1) No notice of intention to commence drilling shall be*  
8 *approved for any well where a hydraulic fracturing treatment will*  
9 *be used or is planned to be used in completing the well until*  
10 *regulations governing hydraulic fracturing treatments are adopted*  
11 *by the division and have taken effect.*

12 *(2) The hydraulic fracturing treatment regulations shall be*  
13 *comprehensive and ensure that the integrity of the well and well*  
14 *casing are maintained.*

15 ~~SEC. 2. Section 3203.5 is added to the Public Resources Code,~~  
16 ~~to read:~~

17 ~~3203.5. Notwithstanding any other law, until regulations~~  
18 ~~governing hydraulic fracturing have been adopted, the supervisor~~  
19 ~~or a district deputy shall not approve or issue a permit authorizing~~  
20 ~~the drilling of a well pursuant to this division in which hydraulic~~  
21 ~~fracturing is used or is proposed to be used in the production of~~  
22 ~~oil and gas.~~

## **Attachment 3**

### **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT LEGISLATIVE REPORT**

#### **FROM HOME RULE ADVISORY GROUP MEETING OF JUNE 20, 2012**

HRAG members present:

Dr. Joseph Lyou, Chairman

Elaine Chang, SCAQMD

Elizabeth Adams, EPA (participated by phone)

Greg Adams, L.A. County Sanitation Districts

Curtis Coleman, Southern California Air Quality Alliance (part of meeting)

Sue Gornick on behalf of Curt Coleman (part of meeting)

Chris Gallenstein, CARB (participated by phone)

Bill LaMarr, California Small Business Alliance

Rongsheng Luo, SCAG (participated by phone)

Art Montez, AMA International

Bill Quinn, CCEEB (participated by phone)

Lee Wallace, So Cal Gas and SDG&E

Mike Wang, WSPA

#### **LEGISLATIVE UPDATE**

William Sanchez provided the following report to the Home Rule Advisory Group (HRAG) on what was discussed at the Legislative Committee meeting on June 8, 2012.

#### **Federal**

The consultants reported that all bill activity has slowed and is not expected to pick up again until after the November elections. The Senate version of the Surface Transportation Reauthorization bill has stalled on the House side. If the House cannot reach consensus before the end of June when the current authorization expires, they may wait until after the November election to act on the bill. In the meantime, this most likely will result in another continued resolution for 90 days. On the Senate side, Senator Inhofe introduced a resolution intended to prevent US EPA from issuing new rules for air pollution.

#### **State**

Sacramento's primary focus still remains on the budget. Bills on major issues, including pension reform, have stalled until after the November election. There has been discussion that the pension reform issue will be included in some trailer bill language but this has not been confirmed. The conference committees on pension reform continue to meet but their two proposed bills still remain in spot form.

At their meeting on June 8, 2012, the Legislative Committee adopted staff's recommended positions on the following bills:



## Attachment 3

Bill/Title	Recommended Position
AB 1570 (Perea) Environmental Quality: California Environmental Quality Act: Record of Proceedings	Oppose unless amended
SB 984 (Simitian) Environmental Quality: California Environmental Quality Act: Record of Proceedings	Oppose unless amended
AB 1532 (Perez) California Global Warming Solutions Act of 2006: Greenhouse Reduction Account	Support with amendments
SB 1268 (Pavley) Energy: energy conservation assistance	Support

### **AB 1570 (Perea) and SB 984 (Simitian)**

AB 1570 (Perea) and SB 984 (Simitian) are essentially identical bills except that SB 984 is an urgency bill. These bills would require lead agencies to prepare a certified record of proceedings concurrent with the preparation of environmental documents and the preparation of CEQA. Because the language in the bills is too broad and would pose an administrative challenge to the lead agency, the Legislative Committee recommended opposing the bills unless amended.

### **AB 1532 (Perez)**

AB 1532 (Perez) establishes the greenhouse gas reduction account for cap and trade and directs the use of funds generated by cap and trade auctions and other revenues. The Legislative Committee agreed to support the bill with amendments which would include the requirement to prioritize projects that have co-benefits for criteria pollutants.

### **SB 1268 (Pavley)**

SB 1268 (Pavley) would extend the sunsets for both the Energy Conservation Assistance Program and the Local Jurisdiction Energy Assistance Account Program to January 1, 2028. Absent this legislation, the programs would have sunset in 2013 and 2016 respectively. The Legislative Committee concurred with staff's recommendation to support the bill. Mr. Sanchez reported that the bill passed with a bipartisan vote of 12 to 0 in the Assembly Utilities and Communications Committee.

At the last HRAG meeting, several members asked which cap and trade bills are still active. Mr. Sanchez responded that, in addition to AB 1532 (Perez), the following cap and trade bills remain active:

### **AB 1186 (Skinner)**

AB 1186 would require that no less than 10% of the cap and trade funds be used for energy efficiency measures in K-12 schools.

### **AB 2563 (Smyth)**

AB 2563 would require a new process to consider offset protocols.

### **SB 1572 (Pavley)**

SB 1572 is equivalent to AB 1532 (Perez) but is a spot bill that would establish a greenhouse gas reduction fund. However, SB 1572 gives no directives on how the monies should be spent.

## Attachment 3

Mr. Sanchez reported that approximately one dozen bills related to cap and trade have died along the way. Dr. Lyou added that SB 535 (De León) is also still active.

HRAG members' questions and responses to the questions are below:

Q. To what extent does the Surface Transportation Bill impact ports in the Basin?

A. Depending upon which amendments are included in the final bill, the Surface Transportation Bill could be a potential source of funding for projects within the District.

Q. Is the California Delegation in support of the Surface Transportation Bill?

A. Many Congressional offices in California and other states are in support of the Surface Transportation Bill but they cannot reach consensus on the details.

Q. Does AB 1186 (Skinner) stipulate exactly how the cap and trade funds for energy efficiency measures in K-12 schools are used?

A. Staff will review the bill and report back to the HRAG.

### Discussion

Dr. Lyou reported that SB 235 (Loni Hancock and Fran Pavley) was recently amended (June 15, 2012). SB 235 provides Proposition 1B funding for various transportation-related purposes, including for shore side power projects. Under SB 235, CARB would be required to provide the funds up front and to no longer distribute the funds on a reimbursement schedule to ensure that the work is completed and that air pollution reductions are achieved.

One HRAG member expressed concern that the AB 32 funds are not directed to the impacted communities. Dr. Lyou responded that there has been a concerted effort to ensure that the most impacted communities are benefitting through AB 32 revenue that is generated; and SB 535 (De León) specifically addresses this issue. Mr. Sanchez added that AB 1532 (Perez), if passed, also would direct investment toward the most disadvantaged communities in the state. Dr. Lyou noted that CARB has expressed support for the idea of directing investment toward the communities that are the most impacted.

One HRAG member asked for additional information on the event in Washington scheduled for June 21, 2012 (<http://www.actexpo.com/pdfs/ACTE2012/PoweringFutureCleanTechForum.pdf> ). Mr. Sanchez responded that senior legislative staff members are attending the forum along with the District's executive staff. Approximately six members of Congress will be participating on the panel, and the discussions will focus on transportation air quality issues.

One HRAG member asked if the subvention funding has survived the budget cuts. Mr. Sanchez responded that the subvention funding has survived so far but that the budget is still subject to the Governor's review and blue line veto. CCEEB has offered to write a letter of support, if needed.

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 25

REPORT: Mobile Source Committee

SYNOPSIS: The Mobile Source Committee met Friday, July 27, 2012  
Following is a summary of that meeting.

RECOMMENDED ACTION:  
Receive and file.

John J. Benoit, Acting Chair  
Mobile Source Committee

EC:fmt

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### **Attendance**

Supervisor John J. Benoit called the meeting to order at 9:10 a.m. Present via videoconference were Dr. Clark E. Parker and Supervisor Shawn Nelson (*arrived at 9:38 a.m.*). Mayor Ronald Loveridge and Councilwoman Jan Perry were absent.

### **INFORMATIONAL ITEMS:**

#### **1) Update on Air Quality-Related Health Studies**

Dr. Jean Ospital, Health Effects Officer, presented a summary of U.S. EPA's recently proposed National Ambient Air Quality Standard for particulate matter, as well as two recent ozone and health studies.

The Administrator has proposed lowering the annual PM<sub>2.5</sub> NAAQS to between 12 - 13  $\mu\text{g}/\text{m}^3$  from the current standard of 15  $\mu\text{g}/\text{m}^3$ , and retain the current 24 hour standards for PM<sub>2.5</sub> and PM<sub>10</sub>. Based on currently adopted control strategies, EPA staff projects that in 2020 (the anticipated attainment deadline date should U.S. EPA revise the standard), two counties in California - Riverside and San Bernardino - would not be in attainment.

The Administrator has also proposed a new secondary standard for visibility in units called deciviews, that measure the reduction in light transmission. The deciview units are calculated using a formula based on PM<sub>2.5</sub> components, including nitrate, sulfates, carbon and relative humidity. The proposed standard range is 28 - 30 deciviews. U.S. EPA projects that in 2020, Riverside County would not be in attainment with the proposed visibility standard. There is no

deadline for attaining secondary standards, but rather all feasible measures are required to proceed to attainment.

One of the ozone studies presented found changes in healthy volunteers that reflected changes in inflammation and heart rate that may reflect biological mechanisms by which ozone may produce adverse cardiovascular effects. The other study presented estimated national benefits of attaining alternate ozone standards compared to 2005 - 2007 air quality. For example, meeting the current 75 ppb ozone standard would result in an estimated reduction of air pollution related mortalities of about 2,000, while meeting a standard of 60 ppb would result in an estimated reduction of about 6,000 mortalities annually.

Dr. Parker inquired as to the reality of being able to meet those projections, especially for the health concerns. Dr. Elaine Chang, Deputy Executive Officer, responded that the federal deadline to meet the 75 ppb, the current standard, is 2032, and it will take a significant effort to achieve. The 70-60 ppb will be beyond the 2030 timeframe. Dr. Parker also inquired about having the infrastructure in place to support the number of cars that will be converted to near-zero emission. Mr. Henry Hogo, Assistant Deputy Executive Officer – Mobile Sources, responded that staff has been working with the auto manufacturers and the hydrogen infrastructure. He also stated that CARB amended its regulation earlier this year to require the construction of hydrogen refueling stations if a sufficient number of hydrogen fuel cell vehicles are offered for sale. As part of CARB's Clean Fuels Outlet Regulation, there will be requirements for fueling stations to be built. Dr. Parker noted that in order to have near-zero emission cars, the infrastructure has to be available because people will not buy cars unless filling stations are there to support them. Mr. Hogo stated that the SCAQMD has been supporting the construction of hydrogen fueling stations as these cars are being introduced. There are around a dozen fueling station in the region, and staff will continue to promote the construction of refueling stations; therefore, there will be a sufficient number for the number of vehicles that will be introduced in the early years, and as the volume picks up then the requirement of the State will be implemented.

Regarding a chart presented showing an EPA staff projection that Riverside and San Bernardino Counties would not meet the proposed lower PM2.5 standard in 2020, Supervisor Benoit asked why the entire counties were depicted as not meeting the standard. Staff replied that the projections were done at the county level as an initial analyses, likely using the monitor with the highest estimated future air quality levels. Should the U.S. EPA adopt a lower standard, the Agency would go through a process of attainment designation, and this would be done by air basins or metropolitan areas rather than by county.

Mr. Hogo also added that both San Bernardino and Riverside are split into two air districts and different air basins, so when the air quality standards are promulgated there will be a round of designations and it could be that the South Coast Air Basin could be designated as non-attainment, but the remainder of the counties that are in the Mojave Desert and Coachella Valley may not be designated as non-attainment.

Supervisor Benoit expressed concern that there is no cost figures associated with the efforts to lower the standard and questioned what it would cost to go to an all hydrogen vehicle fleet if that is what it takes to meet the 60 ppb standard.

## 2) **Update on Draft 2012 AQMP**

Dr. Philip Fine, Planning & Rules Manager, provided an update on the development of the 2012 Air Quality Management Plan, including the contents and scope of the Plan. He announced that the draft Plan was released last week for public comment and review. Staff will continue its extensive outreach efforts. Thus far, they have conducted meetings to various groups throughout the region and have held five public workshops.

Dr. Fine gave an overview of the key elements in the Plan, which includes demonstrating progress toward the 24-hour PM 2.5 standard. The 24-hour PM 2.5 SIP has to be submitted to U.S. EPA by December 2012, and attainment should be demonstrated by 2014 with a five-year extension option to 2019. To request an extension of the attainment date from 2014 to 2019 would require an analysis to demonstrate that there are no adequate feasible control measures that could be adopted and implemented to achieve attainment earlier than 2019. The Clean Air Act (CAA) also requires that contingency measures be included in the Plan that would be automatically triggered if the region failed to meet the standard by the attainment date. The Plan also includes ozone reduction strategies to help attain the 8-hour ozone standard (80 ppb) by 2023 and (75 ppb) by 2032. To meet the 2023 ozone standards, the previous AQMP included a large amount of emission reductions that have yet to be specifically identified. The CAA Section 182(e)(5) allows for attainment demonstration with these unspecific emission reductions known as the “black box”. The 2012 AQMP further implements that ozone plan, and attempts to chip away at that “black box” and identify some additional reductions that have become available since the last Plan.

Staff projects that with all of the existing controls that have already been adopted the only area that will be above the standard of 35  $\mu\text{g}/\text{m}^3$  by the 2014 attainment date is the area surrounding the Mira Loma air monitoring stations; however, the rest of the basin will be in attainment. By 2019, the area around the Mira Loma

air monitoring station would also be in attainment of the standards, but the CAA requires moving the attainment date up, if it is at all possible.

Dr. Fine briefly described the control measures proposed for PM<sub>2.5</sub> and ozone. The specific commitments for reductions in the SIP that staff are proposing to submit to U.S. EPA include: approximately 24 tons per day total of NO<sub>x</sub> emission reductions; approximately 12 tons per day of PM<sub>2.5</sub> emission reductions; and 6 tons per day of VOC emission reductions. The 2012 AQMP also includes chapters on emerging topics, which includes a discussion on near-roadway exposure (U.S. EPA is going to be requiring PM<sub>2.5</sub> monitoring next to roadways along with carbon monoxide and nitrogen dioxide; the health impacts coming from ultrafine particle exposure; and energy and climate as a continuation of the discussion from the previously adopted AQMD Air Quality-Related Energy Policy.

Dr. Fine also provided a brief update on the CEQA analysis and Socioeconomic Report for the 2012 AQMP. CEQA guidelines requires that a full analysis be prepared to address associated environmental impacts associated with the project, i.e. the AQMP as proposed; and the analysis must include alternatives to the plan. Three alternatives are currently being reviewed. The no project alternative evaluates what would occur if the plan were not approved. In this case, the 24-hour PM<sub>2.5</sub> standard would not be achieved until 2019. The second alternative is localized PM control in the Mira Loma area, which would include curtailment of residential wood burning, controls for livestock waste, and incentives to reduce mobile source emissions from the warehouse and distribution centers in that area. The third alternative is the NO<sub>x</sub> heavy control strategy that is also needed for ozone attainment. The Socioeconomic Report will assess the cost of the PM<sub>2.5</sub>, ozone and transportation control measures and the economic impacts, including the impact on employment. It will also assess the associated health benefits and quantify the benefits of achieving clean air.

Key comments received from outreach meetings and the AQMP Advisory Group meetings are: the concern that staff is including the 8-hour ozone implementation measures into the SIP since it is not specifically required at this time; the concern that there has been insufficient time for plan review, and the request to make some of the raw data for the socioeconomic impact report and cost-effectiveness calculations available. Staff recognizes that it has been a compressed schedule, but are working to make the process transparent and provide available information as soon as possible for review and comment.

Dr. Fine concluded the presentation with the next steps: the draft EIR and Socioeconomic Report are scheduled for release in August; regional hearings that are required by state law are scheduled to be held in September; and the 2012 Plan

is currently scheduled for Board consideration in October (*changed to November since this meeting*) and will need to be submitted to CARB soon thereafter for approval, and then to U.S. EPA by the December 14, 2012 deadline for SIP submittal.

Supervisor Benoit commented that the schedule was aggressive. He also asked staff to describe the universe of people that burn wood for heat, or in other ways, in the Basin, and that would be impacted, given that episodic burning has a huge positive impact on air quality standard attainment. Dr. Fine stated that the current rule has exemptions, including those burning wood over 3,000 feet in elevation, and those who use wood as their primary source of heat. Exemptions also exist for financial hardship, (i.e., using wood for heat rather than paying for the utilities). Staff will report back to the Committee on the number of people that burn wood. Dr. Fine stated that wood burning is a significant source of PM<sub>2.5</sub>, and other sources of PM<sub>2.5</sub> in the Basin have been significantly controlled, therefore, getting additional reductions from those other sources is becoming increasingly difficult. Episodic wood burning curtailment, which might be approximately 20 days a year between November and February, would result in an air quality benefit of approximately 3 µg/m<sup>3</sup>. Thus, compared to the standard at 35 µg/m<sup>3</sup>, this is almost a 10 percent air quality improvement and it has been determined to be very cost-effective. Dr. Fine also noted that most of the wood that is burned in the Basin is done for aesthetic reasons for ambiance and not as a primary heat source. Studies have shown that on a bad winter day wood burning can contribute 10-20 percent of the PM<sub>2.5</sub> problem.

Supervisor Benoit asked where in the Basin wood-burning is done for aesthetic purposes. Dr. Fine responded that he is familiar with areas in the Santa Monica mountains and neighborhoods along the coast that burn wood. Dr. Fine also stated that an analysis of PM<sub>2.5</sub> was conducted as part of the MATES II in 2005 to determine what fraction of the problem was coming from residential wood-burning. The data from that analysis corroborated the emission inventories as well as other studies that have shown that it is not an insignificant source.

Supervisor Benoit asked whether the No Project CEQA alternative means that if we didn't impose these other restrictions we would still meet the 24-hour PM<sub>2.5</sub> standard by 2019. Dr. Chang affirmed that was correct, because the additional time between 2014 and 2019 would allow the mobile source regulations to be more fully implemented, and for clean air vehicles/engines to be introduced into the fleets. However, there is no guarantee the No Project alternative would be SIP-approvable by EPA if it does not implement all feasible measures. Nevertheless, for CEQA alternative discussions, a no project alternative is required to be analyzed if no action is taken. Supervisor Benoit noted that one alternative would be to request a five-year extension and not adversely impact the

economy, even whatever small level some might argue is impacted. He considers the No Project alternative to be an interesting alternative given the state of the economy. Dr. Chang stated that staff seriously doubts that EPA would accept the No Project alternative because feasible measures exist, including the fireplace curtailment that is being implemented in the Bay Area and the San Joaquin Valley, which are even more stringent than our proposal. Therefore, EPA could reject our Plan based on failure to implement all feasible measures as implemented by other air districts.

Dr. Parker asked whether we are proposing any new major regulatory rules for industries in our jurisdiction with the implementation plan that already exists. Dr. Chang stated that three amendments are being proposed to existing regulations. The reductions from NO<sub>x</sub> RECLAIM (Phase I) is looking to shave 2 tons of NO<sub>x</sub> emissions from RECLAIM sources. There is an estimated 6 to 8 tons of excess credits in the RECLAIM market and, therefore, a reduction in NO<sub>x</sub> RECLAIM emissions should not have a significant impact on the market. The RECLAIM market includes about 300 large industrial facilities in the South Coast Air Basin, including power plants and refineries. Burning curtailment will add a few additional no-burn days to the existing regulations. Otherwise, there are no new regulations being proposed for industries to assist in the PM<sub>2.5</sub> attainment demonstration. Dr. Parker asked whether there would be a push back from industry and from the business community, saying that more regulations are being imposed on them in order to basically meet the 24-hour PM<sub>2.5</sub> standard versus some other alternative. He also asked whether the Board should be anticipating a barrage of this, and are we continuing on the same path as we are right now with some improved technologies such as fuel cells and electric vehicles. Dr. Chang stated that measures currently included as part of the mobile source strategy are primarily based on incentives for ozone attainment purposes. However, several stationary source measures are recommended as a part of the ozone attainment strategy, which some believe should not be done right now since it is not legally required. However, there are over 200 tons per day of NO<sub>x</sub> emissions that need to be reduced and the current proposal represents 10 percent of what is required in the next three years.

Supervisor Benoit asked whether the concerns of the Department of Forestry have been included in the no-burn timeframes, since they have felt constrained by our existing rules. Dr. Fine answered that the rule amendment that is being considered for open burning includes no changes to the rule other than changing the forecast threshold. Therefore, as air quality gets cleaner the number of days for no-burn should be reduced. Staff estimates declaring no-burn days for 20 days a year, so those burning events may have to be delayed one, two, or three days, which is not that different from the current program. Dr. Parker asked whether there is an exemption in the regulations for forest fires. Dr. Fine responded that the U.S. EPA



Exceptional Events Policy allows for the exclusion of data affected by natural events, e.g., wild fires and high wind events, from attainment demonstration. The request to exclude such an event from the reporting data has to be supported with a lot of documentation; however, it has been done several times in the past and excluded.

**3) Status Report on Joint Vision Document**

Mr. Henry Hogo provided an update on the Vision Document released at the end of June 2012. The Vision document is a joint effort with the California Air Resources Board and San Joaquin Valley Air Pollution Control District. The document is a framework for integrated actions to address multiple air quality standards deadlines and climate change goals and serves as a resource for the development of future AQMPs, updates to the State's AB 32 Scoping Plan, and the State's Freight Movement Plan. In addition, the document recognizes the co-benefits to reducing air toxic exposure.

The document focuses on five key sectors: passenger transportation, freight movement related sources, off-road equipment, agricultural vehicles (operating primarily in the San Joaquin Valley), and energy. Seven key concepts (or findings) are made: technology transformation, early actions, cleaner combustion engines, need for integrated strategies, federal actions, efficiency gains, and energy transformation. Staff indicated that the pace of technology transformation is not fast enough for the region to meet air quality standards and early actions are needed to develop and deploy zero- and near-zero emission technologies. For locations where zero- or near-zero emission technologies are not as feasible to deploy, cleaner combustion engines beyond existing emission standards will be needed. In addition, federal actions will be needed to further reduce emissions from locomotives, marine engines, and aircraft engines.

The document identifies actions for ten key mobile source sectors to further develop zero- and near-zero emission technologies for commercial deployment. The ten sectors include: passenger cars, transit and school buses, on-road heavy-duty trucks, agricultural vehicles, locomotives, ocean-going vessels, harbor craft, cargo handling equipment, off-road equipment, and aircraft. Staff discussed potential technologies to be developed including electric, battery-electric, fuel cell, plug-in hybrid systems, and alternative fuels. For some sectors such as marine vessels, where zero-emission technologies are not as feasible, development of cleaner combustion and advanced aftertreatment technologies will be needed. A proposed timeframe for research, development, demonstration and deployment of new near-zero and zero-emission technologies was presented. There are four areas of focus: scoping and planning; prototype development and demonstration; limited field demonstration; and commercialization and deployment.

The presentation concluded with next steps, which include the release of the draft document. Staff indicated that seven of the ten actions identified in the draft document are proposed in the draft 2012 AQMP and a public workshop is tentatively scheduled for August 23, 2012 to solicit public input and comments.

Supervisor Benoit asked staff what federal actions can be done. Staff indicated that the federal government could establish tighter emission standards for federal transportation sources and off-road equipment. In addition, the federal government could look at ways to bring cleaner vehicles into the region.

**WRITTEN REPORTS:**

- 4) **Rule 2202 Activity Report**  
Written report submitted. No comments.
  
- 5) **Monthly Report on Environmental Justice Initiatives – CEQA Document Commenting Update**  
Written report submitted. No comments.

**OTHER BUSINESS:**

None

**PUBLIC COMMENT**

None

The meeting was adjourned at 10:15 a.m.

**Attachment**

Attendance Roster

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
MOBILE SOURCE COMMITTEE MEETING  
Attendance Roster- July 27, 2012**

NAME	AFFILIATION
Acting Chair John J. Benoit	AQMD Governing Board ( <i>via videoconference</i> )
Committee Member Clark E. Parker	AQMD Governing Board ( <i>via videoconference</i> )
Committee Member Shawn Nelson	AQMD Governing Board ( <i>via videoconference</i> )
Board Consultant/Asst. Mark Abramowitz	AQMD Governing Board (Lyou)
Board Consultant/Asst. Jeff Catalano	AQMD Governing Board (Perry) <i>via videoconference</i>
Lee Wallace	Southern California Gas Co./SDG&E
Curt Coleman	Southern California Air Quality Alliance
David Rothbart	Los Angeles County Sanitation District
Ron Wilkniss	Consultant to Western States Petroleum Assn.
Linda Holcomb	California Autobody Association
Elaine Chang	AQMD Staff
Laki Tisopulos	AQMD Staff
Kurt Wiese	AQMD Staff
Nancy Feldman	AQMD Staff
Henry Hogo	AQMD Staff
Jean Ospital	AQMD Staff
Joe Cassmassi	AQMD Staff
Carol Gomez	AQMD Staff
Patti Whiting	AQMD Staff
Sue Lieu	AQMD Staff
Ernie Lopez	AQMD Staff
Tina Cherry	AQMD Staff
Kim White	AQMD Staff

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 26

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee met Friday, July 27, 2012. Following is a summary of that meeting. The next meeting will be September 21, at 10:30 a.m., in Conference Room CC8.

RECOMMENDED ACTION:  
Receive and file.

Dennis Yates, Chair  
Stationary Source Committee

MN:am

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### **Attendance**

The meeting began at 10:30 a.m. Present were Mayor Dennis Yates, Councilwoman Judith Mitchell, Dr. Joseph Lyou and Supervisor Shawn Nelson (videoteleconference). Absent was Mayor Ronald Loveridge.

### **INFORMATIONAL ITEMS**

#### **1. Update on the Check Before You Burn Program (Rule 445)**

Dr. Philip Fine, Planning and Rules Manager, gave the staff presentation. Rule 445 Wood Burning Devices establishes a residential wood burning curtailment program, applicable each winter season from November through February, and called for specific areas if the PM<sub>2.5</sub> air quality is forecast to exceed the federal standard of 35 µg/m<sup>3</sup>. For the 2011/2012 season, no curtailments were called; however, analyzed ambient data (from filter-based samplers) indicated nine days exceeded the federal standard in November and December 2011. This past winter was unusual with offshore flows and little rainfall. Staff is continuing to improve the forecasting and is looking to lower the curtailment threshold to 30 µg/m<sup>3</sup> as proposed in the 2012 draft AQMP. The AQMD implemented the Check Before You Burn Program

this past season to notify the public of the program which consists of several tools including Interactive Burn/No Burn map on the AQMD web site as well as the ability to receive email alerts or obtain information through a toll-free phone line. Upcoming activities include a press release for the upcoming winter season, partnership with TV stations to run news stories, daily forecasts, and announcements of no-burn days, as well as updates to the Healthy Hearths web site and continued promotion of the gas log incentive program.

There were no public comments. Dr. Lyou inquired about the outreach for the Check Before You Burn program and if better avenues were available, such as on Facebook or point of sale for firewood. Dr. Fine responded that staff would be seeking to expand outreach in conjunction with the draft 2012 AQMP control measure. Mayor Yates indicated that the Administrative Committee is recommending the TV partnership be with KABC Channel 7 and inquired as to the number of gas log sets that have been sold under the incentive program; to which Dr. Fine responded approximately 10,000. Supervisor Nelson inquired about how enforcement would work. Mohsen Nazemi, Deputy Executive Officer, stated that first-time violations would be done via mail and there are options for training and monetary penalty for repeat violators, but that inspection staff would not be knocking on residents' doors. Supervisor Nelson further said that residences should be allowed to burn up to three times per year without getting into trouble; to which Dr. Laki Tisopulos, Assistant Deputy Executive Officer, expanded by highlighting that the enforcement action would only occur when a curtailment forecast is made, which is expected to not exceed 20 days per year and noting zero days were forecast this last season. Supervisor Nelson also inquired if the AQMD would realistically be able to get information out since so many people do not get their news from local news casts, but by other means. Dr. Fine responded that Bay Area AQMD has had much success with their program and more education is needed to get name recognition. Councilwoman Mitchell inquired about notifications; Dr. Fine stated a warning letter would be issued before any enforcement action is taken.

**2. Proposed Amended Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II & Proposed Amended Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II**

Naveen Berry, Planning & Rules Manager, presented a summary of the staff proposal for amending Rules 219 and 222. Linda Holcomb, California Autobody Association, requested that heaters used in autobody shop operations be included as exempt from permitting requirements. Mr. Al Javier, Eastern Municipal Water District requested a reconsideration on the state certification program, since certification of some microturbines provided by the AQMD and installed are due to expire in October 2012 and these units may not be able to be recertified. Bill

LaMarr, California Small Business Alliance, requested that the Committee support adding additional emission sources regulated under Rule 1147 to Proposed Amended Rule 219. Dr. Lyou suggested that staff explore a fee program for the exempted Rule 1147 equipment to fund NOx reduction programs under other categories. Councilwoman Mitchell recognized that the proposed amendments provide some solutions to the Rule 1147 issues, and encouraged staff to evaluate other additional equipment categories that emit less than one pound per day of NOx.

### **3. Rule 1147 Continuation of Implementation Update**

Joe Cassmassi, Planning and Rules Manager gave a presentation on implementation of the September 2011 Board Resolution and amended Rule 1147 requirement to revisit the technology assessment and cost analysis prepared for adoption of the rule in December 2008. The presentation focused on responses to questions, comments and concerns regarding implementation from Committee members and stakeholders at the June Stationary Source Committee meeting.

Mr. Cassmassi indicated that the technology assessment would take place in phases and that the schedule was consistent with other technology assessments (2½ to 4 years). The presentation highlighted that AQMD staff had initiated the first phase of the assessment in October 2011, one month after the rule amendment to delay compliance dates, and the technology assessment, as the amended rule indicates, is required to be completed by December 2015. The first phase of the assessment will be completed with adoption of proposed amendments to AQMD Rules 219 and 222 that were presented in an earlier item.

Mr. Cassmassi also stated that staff had met with the Rule 1147 Task Force twice since the rule amendment and repeated requests for additional information from stakeholders to enhance the technology assessment. In addition, the rule compliance advisory mailed to all facilities potentially affected by the rule included all of the elements requested by stakeholders in those meetings. Staff had also met with stakeholders to discuss how they could refine their public record requests to identify affected companies.

Linda Holcomb from the California Auto Body Association and Bill LaMarr from the Small Business Alliance provided testimony and stated the Board and staff had committed to completing the technology assessment sooner and by not doing so failed to live up to commitments made by the Board and the Executive Officer. They are concerned about the availability of compliant equipment, the cost of retrofitting existing units and problems with getting local government approval of retrofits. In addition, they stated that most of the affected companies are small and do not know how to comply with the rule, so that the AQMD should provide business additional time to comply with the July 1, 2012 compliance date. Both

suggested there should be a cost effectiveness limit before requiring retrofit or replacement of equipment and that the methodology and criteria should be Board approved. Ms. Holcomb also stated that paint companies are developing non-VOC coatings and that auto body booths should therefore be exempted from the rule. Noel Muyco of The Gas Company supported the comments made by others and stated that The Gas Company had been working to educate their customers but many were small businesses and did not know how to comply.

Dr. Tisopulos responded that staff had started on the technology assessment in October 2011, but had not received much input from the Rule 1147 Task Force on specific equipment where technology is limited. Staff had worked with companies and industry groups that approached staff separately from the Task Force. Preliminary results of this effort are reflected in the proposed equipment categories for exemption from permitting through the proposed Rule 219 and 222 amendments. The staff proposal was presented to the Task Force and the public through two separate meetings held approximately a week prior to the July Stationary Source Committee meeting. He also posed the question that if coatings that do not require heaters will become available soon, then there would be no need for auto body shops to replace their heaters. They could remove them and no longer be subject to the rule.

Supervisor Nelson felt the Technology Assessment should be completed sooner and that cost in addition to technology should determine whether a business is subject to the rule. Dr. Lyou supported the need to complete the technology assessment sooner and suggested that some portions can be completed sooner.

Dr. Tisopulos responded that a technology assessment and cost-effectiveness analysis was completed for the December 2008 adoption of the rule. However, staff had committed to revisiting these analyses for the existing small (less than one pound/day) sources which are not subject to emission limits until 2017 at the earliest. He reiterated, however, that staff is not waiting until 2017. For the segment of equipment categories where the analysis is complete, staff is proposing to move forward with the proposed amendment of Rules 219 and 222. Mr. Cassmassi stated that stakeholders need to provide more specific information if additional categories of equipment need to be included in the Technology Assessment.

Councilwoman Mitchell stated that communication is essential between the staff, affected business, and stakeholders and more should be done to improve the communication. Staff should continue to meet with stakeholders to identify equipment that will have difficulty complying with the rule. Businesses also need certainty; the technology assessment should be completed as soon as possible. Supervisor Nelson supported Councilwoman Mitchell's comments and stated that

business is looking for direction and the technology assessment should be completed as soon as possible.

Mayor Yates stated that staff has been working very hard to implement and evaluate the impacts of Rule 1147. It is a complicated process because of the variety of equipment the rule affects. He and the AQMD Board appreciate the efforts staff has undertaken to address the concern of stakeholders.

#### **4. NSR Status Update/Equivalency Determination**

Due to time constraints, this item was not heard. Mayor Yates asked if there were any public comments regarding this item, which there were none.

### **WRITTEN REPORTS**

All written reports were acknowledged by the Committee.

### **PUBLIC COMMENTS**

There were no public comments.

### **Attachment**

Attendance Roster



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
STATIONARY SOURCE COMMITTEE  
July 27, 2012  
ATTENDANCE ROSTER (Voluntary)**

NAME	AFFILIATION
Mayor Dennis Yates	AQMD Governing Board
Dr. Joseph Lyou	AQMD Governing Board
Councilwoman Judith Mitchell	AQMD Governing Board
Supervisor Shawn Nelson (VT)	AQMD Governing Board
Mark Abramowitz	AQMD Governing Board (Lyou)
Marisa Perez	AQMD Governing Board (Mitchell)
Curtis Coleman	So. CA Air Quality Alliance
Bill LaMarr	CSBA
Linda Holcomb	California Auto Body
Kris Flaig	City of Los Angeles/Sanitation
Ron Wilkness	Consultant to WSPA
David Rothbart	LACSD
Noel Muyco	So Cal Gas
Rita Loof	RadTech
Daniel Holmstram	Almega Environmental
Al Javier	Eastern MWD
Mohsen Nazemi	AQMD Staff
Barbara Baird	AQMD Staff
Phil Fine	AQMD Staff
Laki Tisopulos	AQMD Staff
Elaine Chang	AQMD Staff
Jill Whynot	AQMD Staff
Joe Cassmassi	AQMD Staff

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
STATIONARY SOURCE COMMITTEE  
July 27, 2012  
ATTENDANCE ROSTER (Voluntary)**

Tracy Goss	AQMD Staff
William Thompson	AQMD Staff
George Illes	AQMD Staff
Danny Luong	AQMD Staff
Gary Turner	AQMD Staff
Mohan Balagopalan	AQMD Staff
Tina Cherry	AQMD Staff
Brad Buzil	AQMD Staff
Bahareh Farahani	AQMD Intern

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 27

REPORT: Technology Committee

SYNOPSIS: The Technology Committee met on July 27, 2012. Major topics included Technology Advancement items reflected in the regular Board Agenda for the September Board meeting. A summary of these topics with the Committee's comments is provided. The next Technology Committee meeting will be on September 21, 2012 at 12 p.m. in CC-8.

RECOMMENDED ACTION:  
Receive and file.

John J. Benoit  
Technology Committee Chair

CSL:pmk

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**Attendance:** Supervisor John Benoit, Dr. Clark Parker, Sr., and Councilwoman Jan Perry participated by videoconference. Councilwoman Judith Mitchell, Mayor Miguel Pulido, and Mayor Dennis Yates were in attendance at District headquarters.

## SEPTEMBER BOARD AGENDA ITEMS

### 1. California Fuel Cell Partnership Steering Team Meeting Summary and Quarterly Update

This report summarizes the California Fuel Cell Partnership Steering Team meeting held June 12-13, 2012 and provides the quarterly update for the period beginning January 2012.

*Mayor Yates asked if hydrogen can now be measured for commercial sale and whether customers can pay for hydrogen as a metered fuel. Staff stated that this is still an issue being addressed at the state level by the Department of Weights and Measures. The automakers currently negotiate agreements with station providers to allow their customers to fuel and pay on a per-visit or per-fill basis. Mayor Yates further asked if state regulations require car manufacturers to produce fuel cell*

*cars. Staff affirmed that the CARB Zero Emission Vehicle regulation requires car manufacturers to produce fuel cell and battery electric vehicles.*

*Supervisor Benoit asked if the 68 stations in the CaFCP Roadmap Project will be commercial stations and asked if the fuel cell vehicles will be available to average consumers. Staff stated that the 68 stations will be commercial stations and are needed to ensure the success of the initial fuel cell vehicle market. Although vehicles are initially in test fleets, they are intending to roll out vehicles to average consumers. Honda currently offers a standard lease for the Clarity and all of the manufacturers, including Toyota, GM, Daimler, Hyundai, and Nissan, have indicated their intent to offer vehicles with cost parity to other commercial vehicles.*

*Dr. Parker asked how many fuel cell cars are there in California and in the South Coast region, and if most of the 68 stations will be in the South Coast region. Staff stated that there are about two hundred fuel cell vehicles in California now but the automakers forecast thousands in the 2015 timeframe. Most of the 68 stations will be in the South Coast region.*

*Councilmember Perry joined the meeting at 12:20 p.m.*

*This was a receive and file item.*

**2. Authorize Acquisition of Six Advanced Technology Vehicles for AQMD's Alternative Fuel Vehicle Demonstration Program **

The AQMD tests and demonstrates new vehicles with low- and zero-emission technologies as they become available. This action is to lease two Chevrolet Volt extended-range electric vehicles, two Mercedes F-cell fuel cell vehicles and two Honda Fit electric vehicles. Total cost to the AQMD for these six vehicles will not exceed \$119,000 from the Clean Fuels Fund (31).

*Dr. Parker asked for clarification on the lease cost of the Mercedes fuel cell cars. Staff stated that the lease cost in the Board Letter does not include the cost of hydrogen fuel.*

*Mayor Yates asked if the cars mentioned in this item will get DMV carpool lane stickers. Staff stated that these cars will be eligible for carpool lane "Clean Air Vehicle" stickers.*

*Staff has been unable to timely secure the campaign contribution form for the action to acquire the Mercedes FCell vehicles. Staff requests that the Committee approve the acquisition of the Chevy Volts and the Honda Fit EVs. Should the campaign contribution form be provided for the Mercedes vehicles prior to the Board Meeting on September 7, staff would have the Board also consider the request to acquire these vehicles at that time.*

*Moved by Yates; seconded by Parker; unanimously approved.*

**3. Recognize Revenue from U.S. EPA for Battery Electric Vehicle Replacement Projects** 

On June 1, 2012, AQMD staff applied for an award from the U.S. EPA's Diesel Emissions Reduction Act program for on-road battery electric vehicle replacement projects. On July 12, 2012, the U.S. EPA approved AQMD's proposal and will issue an award of \$800,000 to fund the proposed projects. This action is to recognize revenue into the Advanced Technology, Outreach, and Education Fund (17) to replace on-road medium-duty diesel trucks with battery electric trucks.

*Mayor Pulido joined the meeting at 12:39 p.m.*

*Mayor Yates asked how much of the \$800,000 award from U.S. EPA will be used for AQMD administrative costs. Staff mentioned that for this project AQMD is not requesting administrative funds from U.S. EPA and will be providing in-kind staff time as project cost share. Staff committed to explore administrative compensation with the U.S. EPA since the cost-share anticipated from the CARB HVIP is expected to increase.*

*Moved by Mitchell; seconded by Perry; unanimously approved.*

**Public Comment Period** – There was no public comment.

**Other Business** – There was no other business.

The next meeting will be September 21, 2012.

**Attachment**  
Attendance

## Attachment A – Attendance

Supervisor John J. Benoit .....	AQMD Governing Board (via VT)
Councilmember Judith Mitchell .....	AQMD Governing Board
Dr. Clark Parker, Sr. ....	AQMD Governing Board (via VT)
Councilmember Jan Perry .....	AQMD Governing Board (via VT)
Mayor Miguel Pulido .....	AQMD Governing Board
Mayor Dennis Yates .....	AQMD Governing Board
Mark Abramowitz .....	Board Assistant (Lyou)
Jeff Catalano .....	Board Assistant (Perry) (via VT)
Allis Druffel.....	Board Assistant (Cacciotti)
Marisa Perez .....	Board Assistant (Mitchell)
Bob Ulloa.....	Board Assistant (Yates)
John Olvera, Principal Deputy District Counsel .....	AQMD
Chung Liu, STA .....	AQMD
Matt Miyasato, STA .....	AQMD
Lourdes Cordova Martinez, STA .....	AQMD
Dipankar Sarkar, STA .....	AQMD
Brian Choe, STA .....	AQMD
Lisa Mirisola, STA .....	AQMD
Paul Wright, IM.....	AQMD
Donna Vernon, STA.....	AQMD
Pat Krayser, STA.....	AQMD
Henry Cheung, STA .....	AQMD Co-op Student
Danielle Robinson .....	ARB
Candice Gantt .....	SCE
Bob Graham.....	SCE
Tom Gross .....	SCE
Alex Pugh .....	SCE

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 28

REPORT: Mobile Source Air Pollution Reduction Review Committee

SYNOPSIS: Below is a summary of key issues addressed at the MSRC's regularly scheduled meeting on August 16, 2012. The MSRC's next regularly scheduled meeting on the third Thursday of the month has been canceled in lieu of the annual offsite joint retreat with their Technical Advisory Committee. The offsite retreat will be held on Monday, September 17, 2012, at the Orange Public Library & History Center, commencing at 9:30 a.m.

RECOMMENDED ACTION:

Receive and file.

Michael D. Antonovich  
AQMD Representative on MSRC

CSL:HH:DAH

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### **Meeting Minutes Approved**

At its August 16, 2012 meeting, the MSRC unanimously approved the minutes from its June 21, 2012 meeting. Those approved minutes are attached for your information (*Attachment 1*).

### **Awards under Local Government Match Program**

As part of the FY 2011-12 Work Program, the MSRC allocated \$6.5 million for the Local Government Match Program. Program Announcement #PA2012-14, which was released on March 2, 2012, with an open application period from April 10 to June 8, 2012, offered co-funding to qualifying medium- and heavy-duty alternative fuel vehicle purchases, alternative fuel infrastructure, and electric vehicle charging infrastructure. The PA also set aside a maximum of \$250,000 for qualifying AB 2766 Subvention Fund recipients in the Coachella Valley to support regional street sweeping programs. In all categories funding was offered on a dollar-for-dollar match basis, with funding to be distributed on

a first-come, first-served basis and a geographic minimum per county of \$812,500. While the PA was still open, the MSRC awarded a total of \$2,873,000 to 11 projects, while deferring one request for street sweeping funds until the Program closed. Twenty-two additional applications were also received prior to the submission deadline. At its August 16, 2012 meeting, the MSRC approved waiving the \$250,000 cap on street sweeping projects and approved awarding \$2,592,926 to fund 23 project requests including the deferred request for street sweeping funds. These awards will be considered by the AQMD Board at its September 7, 2012 meeting. The unallocated funds (\$1,034,074) set aside for this Program will be returned to the AB 2766 Discretionary Fund.

### **Awards for Alternative Fuel Engines for On-Road Heavy-Duty Vehicles**

As part of the FY 2011-12 Work Program, the MSRC allocated \$2 million to encourage owners of older heavy-duty diesel vehicles to repower their vehicles with new lower-emitting alternative fuel engines certified at a NO<sub>x</sub> emission level of 0.2 g/bhp-hr or lower. Program Announcement #PA2012-11 was released on March 2, 2012 and closed June 1, 2012. The incentive level was set at \$25,000 per qualifying vehicle with a maximum funding per entity capped at 30% of the total funds available (or \$600,000). Twenty-five application packages, all from the applicant Krisda Inc., were received by the Program's closing deadline and after being evaluated were deemed compliant with Program requirements. Since the Program was not fully subscribed, at its August 16, 2012 meeting, the MSRC elected to waive the "maximum funding per entity" limitation and unanimously approved a contract to Krisda Inc. in an amount not to exceed \$625,000 for the repower of up to 25 trucks with new LPG engines. This award will be considered by the AQMD Board at its September 7, 2012 meeting. Again, the unallocated funds (\$1,375,000) set aside for this Program will be returned to the AB 2766 Discretionary Fund.

### **Additional Award under Alternative Fuel Infrastructure Program**

As part of the FY 2011-12 Work Program, the MSRC allocated \$4 million for the implementation of new and expanded CNG and LNG refueling stations as well as modification of maintenance facilities to accommodate gaseous-fueled vehicles. Program Announcement #PA2012-10 was released on March 2, 2012, and closes on September 28, 2012. The MSRC previously considered ten applications and awarded a total of \$1,369,000 for those projects. One additional application, from the Orange County Transportation Authority, was received before the PA closed and after being evaluated was deemed compliant with the Program requirements. At its August 16, 2012 meeting, the MSRC unanimously approved funding for the additional application, awarding a contract to Orange County Transportation Authority in an amount not to exceed \$75,000 for maintenance facility modifications in Anaheim and Garden Grove. This award will be considered by the AQMD Board at its September 7, 2012 meeting.



The unallocated funds (\$2,556,000) set aside for this Program will be returned to the AB 2766 Discretionary Fund.

### **Awards for New or Expanded Bikeshare Programs**

As part of the FY 2011-12 Work Program, the MSRC allocated \$1 million for a program to facilitate and promote the implementation, demonstration, or expansion of shared bicycle facilities as a strategy to reduce motor vehicle-generated air pollution. The intent is to promote the use of bicycles as the transportation linkage between the commuter's home or workplace and public transit stations. RFP #P2012-21 was released on April 6, 2012, and closed July 10, 2012. Proposals were required to offer co-funding in an amount equal to or greater than the amount of funding sought from MSRC. Two proposals were received by the RFP closing date and evaluated on: project scope; proposer/team qualifications; promotional, advertising and sponsorship plans; performance tracking; and proposed level of co-funding. At its August 16, 2012 meeting, the MSRC unanimously approved funding: 1) a \$224,000 contract to the Orange County Transportation Authority to implement the Orange County Bike Share Pilot Project in partnership with the City of Fullerton, encompassing approximately 15 locations; and 2) a \$500,000 contract to the City of Santa Monica to implement the Santa Monica/Westside Bikeshare Project, encompassing approximately 35 locations within the City and surrounding Westside Council of Governments cities. These awards will be considered by the AQMD Board at its September 7, 2012 meeting. The unallocated funds (\$276,000) set aside for this Program will be returned to the AB 2766 Discretionary Fund.

### **Award for Implementation of Rideshare Thursday Public Awareness Campaign**

As part of the FY 2011-12 Work Program, the MSRC allocated \$1 million for a program to reintroduce a "Rideshare Thursday" public awareness campaign in the South Coast Air District. The goals of a new Rideshare Thursday campaign are to raise awareness and utilization of the region's "511" services, increase the use of high occupancy vehicle lanes, and increase awareness and participation in local rideshare incentive programs. RFP #P2012-20 was released on April 6, 2012, with a final submission deadline of June 26, 2012. The RFP established the following scoring criteria: campaign design, proposer qualifications, campaign implementation, and cost. A total of 12 proposals were received by the deadline. Proposals were evaluated and the top three ranked proposers were interviewed by a subcommittee comprised of members of the MSRC's Technical Advisory Committee. At its August 16, 2012 meeting, the MSRC unanimously awarded a contract to Fraser Communications in an amount not to exceed \$998,669, with an option clause for an additional year of Rideshare Thursday advertising and outreach, subject to approval by the MSRC and AQMD Board at a later date. This award will be considered by the AQMD Board at its September 7, 2012 meeting.

### **Adoption of Proposed Outreach Strategy**

The MSRC contracted with The Better World Group (TBWG) to perform programmatic outreach services for a two-year period with an additional two-year option. One of TBWG's tasks is development of an outreach strategy outlining activities to be undertaken under the current contract as well as activities which might be undertaken in the subsequent two years. At its August 16, 2012 meeting, TBWG gave an oral presentation to the MSRC reviewing recent outreach successes then outlining its proposed outreach strategy for 2012-2014. The presentation reviewed goals, key target audiences, key messages, communication strategies, and marketing and promotional materials, as well as the results of a survey conducted by TBWG with MSRC project partners that previously received MSRC funding. After the presentation, the MSRC unanimously adopted the proposed outreach strategy for 2012-2014.

### **Approval of FY 2012-12 Administrative Budget**

Administrative costs for the AB 2766 Discretionary Program are limited to five percent annually per statute. Every year, the MSRC adopts an Administrative Budget for the upcoming fiscal year to ensure costs remain within this limitation. On August 16, 2012, the MSRC adopted its FY 2012-13 Administrative Budget in the amount of \$686,023, which is nearly \$54,000 below the five percent cap. As part of the adoption of the FY 2012-13 Administrative Budget, the MSRC included an allocation of \$63,360 for miscellaneous expenditures, such as postage, office supplies and equipment, advertising, travel, etc. These funds will be transferred to the Science & Technology Advancements FY 2012-13 Budget. Expenses will be tracked and any funds not expended by the end of the fiscal year will be returned to the MSRC. The AQMD Board will consider authorization of the fund transfer at its September 7, 2012 meeting.

### **Received and Approved Final Reports**

The MSRC received and approved eight final report summaries, as follows:

1. Riverside County Transportation Commission Contract #MS07079, which provided \$20,000 towards implementation of a bike metro website migration;
2. California Cartage Company Contract #MS08012, which provided \$480,000 towards the purchase of 12 heavy-duty natural gas yard tractors;
3. CalMet Services, Inc. Contract #MS08021, which provided \$900,000 towards the purchase of 30 heavy-duty natural gas refuse haulers;
4. New Bern Transport Company Contract #MS10010, which provided \$113,864 towards the repower of four heavy-duty vehicles;
5. Foothill Transit Contract #MS10011, which provided \$113,865 towards the purchase of 12 heavy-duty natural gas buses;
6. Rio Hondo Community College Contract #MS10016, which provided \$16,077 towards the purchase of one natural gas shuttle bus;

7. CR&R, Inc. Contract #MS11017, which provided \$100,000 towards the expansion of an existing CNG station; and
8. SunLine Transit Agency Contract #MS11074, which provided \$41,849 to implement a special transit service to Indio.

All final reports are filed in the AQMD's library and a two-page summary of each closed project can be viewed in the electronic library on the MSRC's website at <http://www.cleantransportationfunding.org>.

### **Contracts Administrator's Report**

The MSRC's AB 2766 Contracts Administrator provides a written status report on all open contracts from FY 2003-04 through the present. The Contracts Administrator's Report for August 2012 is attached (*Attachment 2*) for your information.

### **Attachments**

Attachment 1 – Approved June 21, 2012 MSRC Minutes

Attachment 2 – August 2012 Contracts Administrator's Report



**MEETING OF THE  
MOBILE SOURCE AIR POLLUTION REDUCTION REVIEW COMMITTEE  
THURSDAY, JUNE 21, 2012 MEETING MINUTES  
21865 Copley Drive, Diamond, Bar, CA 91765- Conference Room CC-8**

**MEMBERS PRESENT:**

(Chair) Greg Winterbottom, representing OCTA  
(Vice-Chair) Greg Pettis, representing RCTC  
County of LA Supervisor Michael Antonovich, representing SCAQMD  
Brad McAllester (Alt.), representing LA County MTA (via v/c)  
April McKay (Alt.), representing LA County MTA (via v/c)  
Temecula Council Member Ron Roberts, representing SCAG  
Ric Teano (Alt.), rep. Orange County Transportation Authority  
San Fernando Council Member Steve Veres, rep. LA County MTA (via v/c)

**MSRC MEMBERS ABSENT:**

Chino Hills Council Member Gwenn Norton-Perry, rep. SANBAG  
Earl Withycombe, representing CARB (via v/c)

**MSRC-TAC MEMBERS PRESENT:**

MSRC-TAC Vice Chair Tanya Love, representing RCTC  
Rongsheng Luo (Alt.), representing SCAG  
Dean Saito, representing SCAQMD

**OTHERS PRESENT:**

Debra Mendelsohn, AQMD Board Asst (Antonovich)

**AQMD Staff**

Ray Gorski, MSRC Technical Advisor  
Drue Hargis, MSRC Administrative Liaison  
John Kampa, Financial Analyst  
Matt MacKenzie, MSRC Contracts Assistant  
Veera Tyagi, Sr. Deputy District Counsel  
Cynthia Ravenstein, MSRC Contracts Administrator  
Rachel Valenzuela, MSRC Contracts Assistant

**CALL TO ORDER**

- Opening Comments  
MSRC Chair Greg Winterbottom called the meeting to order at 2:01 p.m.
- Clean Transportation Policy Update  
No oral report was provided. However, Cynthia Ravenstein, MSRC Contracts Administrator, pointed out an error in the written report. On page 3 where it says that \$20 million is available under CEC's AB 118 program the categories to be funded should be referenced as gasoline and diesel "*alternatives*". MSRC-TAC Member Dean Saito noted that awards were announced two days ago and \$10 million was awarded to Tesla for alternative fueled vehicle development in California.

**PUBLIC COMMENT PERIOD**

Public comments were allowed during the discussion of each agenda item. No comments were made on non-agenda items.

**CONSENT CALENDAR (Items 1 through 7)****Receive and Approve Items****Agenda Item #1 – Approval of Meeting Minutes for May 17, 2012**

The minutes of the May 17, 2012 MSRC meeting were included in the agenda package.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED THE ABOVE MINUTES.

**ACTION:** AQMD staff will include the minutes in the MSRC Committee Report for the July 13, 2012 AQMD Board meeting, as well as place them on the MSRC's website.

**Agenda Item #2 – Summary of Final Reports by MSRC Contractors**

The agenda package included only one final report summary for Go Natural Gas Contract #MS08062, which provided \$400,000 towards construction of a CNG fueling station.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED THE FINAL REPORT ABOVE.

**ACTION:** MSRC staff will file the final reports in the AQMD's library and release any retention on these contracts.

**Receive and File Items****Agenda Item #3 – MSRC Contract Administrator’s Report**

The MSRC AB 2766 Contract Administrator’s Report for June 2012 was included in the agenda package.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED THE CONTRACT ADMINISTRATOR’S REPORT FOR JUNE 2012.

**ACTION:** AQMD staff will include the MSRC Contract Administrator’s Report in Supervisor Antonovich’s MSRC Committee Report for the July 13, 2012 AQMD Board meeting.

**Agenda Item #4 – Financial Report on AB 2766 Discretionary Fund**

A financial report on the AB 2766 Discretionary Fund for the period ending May 31, 2012, was included in the agenda package.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED THE FINANCIAL REPORT ABOVE.

No further action is required.

**For Approval - As Recommended****Agenda Item #5 – Consider Modified Scope of Work and Six-Month Term Extension by County of Los Angeles, Dept. of Public Works, Contract #ML05013**

The County requests to synchronize six additional signals which were not included in their original application, using funds remaining in the contract. The County also requests a six-month term extension to allow time to complete the additional work. The MSRC-TAC unanimously recommends approval of this request.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED THE EXPANDED SCOPE OF WORK AND SIX-MONTH CONTRACTUAL TERM EXTENSION THROUGH JANUARY 2013, FOR COUNTY OF LOS ANGELES, DEPT. OF PUBLIC WORKS, CONTRACT #ML05013.

**ACTION:** MSRC staff will modify this contract accordingly.

**Agenda Item #6 – Consider Modified Scope of Work, Reallocation of Funds between Tasks, and Ten-Month Term Extension by Elham Shirazi Contract #MS10025**

Ms. Shirazi indicates that multiple issues have impacted employer recruitment. She requests to reduce the total number of employers to be recruited from 12-14 to 8-10. She further requests to reallocate \$12,000 from the implementation task to recruitment and a ten-month contract term extension. The MSRC-TAC recommends approval of reducing the total number of employers to 8-10, reducing the county minimum to one employer, a \$12,000 cost reallocation between tasks, and a ten-month contractual term extension.

MSRC Alternate April McKay commented that she heard Ms. Shirazi speak recently at a conference and she does an excellent job. However, in these economic times, it is hard to get employers to commit to telecommuting programs and in spite of this difficulty I believe she's doing a really good job. Thus, I wanted to express my satisfaction and appreciation to her. MSRC Chair Greg Winterbottom echoed her opinion, adding with layoffs and staff reductions being considered, options such as telecommuting were the first to go.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED REDUCING THE TOTAL NUMBER OF EMPLOYERS TO 8-10, REDUCING THE COUNTY MINIMUM TO ONE EMPLOYER, A \$12,000 COST REALLOCATION BETWEEN TASKS, AND A TEN-MONTH CONTRACTUAL TERM EXTENSION THROUGH AUGUST 2013 FOR ELHAM SHIRAZI CONTRACT #MS10025.

**ACTION:** MSRC staff will modify this contract accordingly.

**Agenda Item #7 – Consider 17-Month No-Cost Term Extension by Nationwide Environmental Services Contract #MS10006**

Nationwide Environmental Services requests a 17-month term extension to allow them to meet the five-year operational requirement. The MSRC-TAC unanimously recommends approval of this request.

ON MOTION BY MSRC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER RON ROBERTS, UNDER APPROVAL OF CONSENT CALENDAR ITEMS #1-7, THE MSRC UNANIMOUSLY APPROVED A 17-MONTH CONTRACTUAL TERM EXTENSION THROUGH OCTOBER 2018 FOR NATIONWIDE ENVIRONMENTAL SERVICES CONTRACT #MS10006.

**ACTION:** MSRC staff will modify this contract accordingly.

**ACTION CALENDAR (Items 8 through 13)****FY 2011-12 WORK PROGRAM****Agenda Item #8 – Consider Recommendations under the Alternative Fuel School Bus Incentive Program**

Ray Gorski, MSRC Technical Advisor, explained that while the MSRC has had the Alternative Fuel School Bus Program in place for a few years, it is important every year to solicit new vendors and/or products. The existing school bus vendors, A-Z Bus Sales and BusWest, were previously deemed qualified and did not have to reapply. However, two applications both from Creative Bus Sales were received. One application was to qualify their propane TransTech Type A school bus and the second application was to qualify two electric buses Types A and C. The recommendation is to approve eligibility only of the propane school bus. There is a current program in place allocating \$1.5 million for the FY 2011-12 Work Program so the MSRC-TAC simply recommends that this propane school bus from Creative Bus Sales be deemed qualified to participate in the program at an incentive of \$15,000 per bus. It is recommended, however, that the electric buses be deemed ineligible for participation at this time for two reasons. First, the solicitation document was not written in such a way as to allow a fully electric school bus to qualify. And second, Creative Bus Sales requested an incentive of \$75,000 per bus, which exceeds the allowable cost-share amount in the current ongoing program. The MSRC can consider funding fully electric school buses at a higher incentive if desired during your work program process for next year's work program.

MSRC Member Ron Roberts asked if the school buses in question are fully electric. Mr. Gorski replied yes, they are fully electric buses manufactured by Smith Electric. Another issue was whether these fully electric school buses would be reliable in a school transportation cycle but staff will perform an assessment of their future viability before anything is brought forward for consideration as part of the next work program.

Mr. Roberts said that when Ford put out its first electric truck it was supposed to be operational for eight hours but when his City purchased and put them into service the charge was good only for six hours. Let's make sure it is reliable before we jump into funding anything.

[MSRC Member Michael Antonovich arrived at 2:10 pm; a quorum was already present.]

MSRC Chair Greg Winterbottom asked relative to the propane bus what the engine cost would be if it was not propane. Mr. Gorski replied about \$15,000. Mr. Winterbottom asked what about the cost for the infrastructure. Mr. Gorski replied that would be an additional cost to schools just like natural gas stations are.

ON MOTION BY MSRC VICE-CHAIR GREG PETTIS, AND SECONDED BY MSRC MEMBER RON ROBERTS, THE MSRC UNANIMOUSLY APPROVED CREATIVE BUS SALES AS A NEW VENDOR QUALIFYING THE PROPANE (LPG) TRANSTECH TYPE A SCHOOL BUS FOR A \$15,000 INCENTIVE AND DENYING ELIGIBILITY OF THE ELECTRIC TYPES A AND C SCHOOL BUSES.

**ACTION:** MSRC staff will advise the vendor of the MSRC's choice. When Creative Bus Sales



comes forward requesting funding based on orders, the MSRC will consider an award, subject to AQMD Board approval.

**Agenda Item #9 – Consider Funding for Application Received under the Alternative Fuel Infrastructure Program**

MSRC-TAC Vice-Chair Tanya Love reported that the Alternative Fuel Infrastructure Program Announcement identified an anticipated funding target of \$4 million with eligible applications funded on a first-come, first-served basis, but included a \$250,000 geographic minimum per county. To date the MSRC has awarded a total of \$1,219,000 for nine projects. An additional application from the Southern California Gas Company requesting \$150,000 has been received. There is adequate money available under the program, even while continuing to set aside sufficient funds to ensure the geographic minimum for Orange County which hasn't yet been met.

ON MOTION BY MSRC-TAC ALTERNATE BRAD MCALLISTER, AND  
SECONDED BY MSRC-TAC MEMBER MICHAEL ANTONOVICH, THE MSRC  
APPROVED AWARDING \$150,000 TO SOUTHERN CALIFORNIA GAS  
COMPANY FOR A NEW PUBLIC ACCESS NATURAL GAS STATION UNDER  
THE ALTERNATIVE FUEL INFRASTRUCTURE PROGRAM AS PART OF THE FY  
2011-12 AB 2766 DISCRETIONARY FUND WORK PROGRAM.

**ACTION:** AQMD staff will submit this contract award to the AQMD Board for approval at its July 13, 2012 Board meeting.

**Agenda Item #10 – Consider Funding for the Applications Received under the “Near-Zero Emission” Medium-Duty and Medium-Heavy Duty Vehicles Program**

Ray Gorski explained that this Program Announcement, which provides \$2.5 million in incentives, is still open. However, it was set up for applications received the first day to be considered received at the same time, and since it was not oversubscribed on the first day, funding recommendations can move forward while it remains open. There is one issue that the MSRC needs to consider in addition to the eligible list. The Program includes a geographic minimum of \$300,000 per county and Riverside County has not yet met its geographic minimum. There remains an additional \$40,000 set aside for their geographic minimum. If the MSRC would like to begin funding applications today, an additional \$40,000 would be needed to fund the first-day applications to ensure the remaining geographic minimum set aside is available for Riverside. The MSRC-TAC is concerned that if awards are not made timely, some of the applicants could experience difficulties in implementing their projects. At this time the MSRC-TAC recommends funding applications only through VSP Parking, as shown in Table 2 on superpage 73, in the cumulative amount of \$2,315,000 for 98 qualifying vehicles.

MSRC Chair Greg Winterbottom asked if the program would stay open until September. Mr. Gorski replied yes it will. However, if interested parties call for more information, staff can advise them that while the program is oversubscribed it will not preclude them from applying. Cynthia Ravenstein, MSRC Contracts Administrator, asked if language to this extent can be placed on the MSRC's website. Mr. Gorski said so long as it stipulates that funding is not guaranteed. Veera Tyagi, AQMD Sr. Deputy District Counsel, indicated her approval to place

language on the website advising potential proposers of the program's status with the clarifying language suggested.

John Kampa, AQMD Financial Analyst, added that even without factoring into today's funding actions there is \$500,000 available for allocation.

**ACTION:** MSRC Chair Winterbottom asked if staff can perform some additional outreach to Riverside County to ensure they utilize their full geographic minimum.

ON MOTION BY MSRC-TAC ALTERNATE APRIL MCKAY, AND SECONDED BY MSRC MEMBER MICHAEL ANTONOVICH, THE MSRC UNANIMOUSLY APPROVED AUGMENTING THE NEAR-ZERO EMISSIONS PROGRAM WITH AN ADDITIONAL \$40,000 TO ENSURE RIVERSIDE COUNTY'S GEOGRAPHIC MINIMUM SET ASIDE, FUNDING PROJECTS LISTED ON TABLE 2 ON SUPERPAGE 73 TOTALING \$2,315,000 AS PART OF THE FY 2011-12 AB 2766 DISCRETIONARY FUND WORK PROGRAM, AND DIRECTING STAFF TO PERFORM ADDITIONAL OUTREACH TO RIVERSIDE COUNTY ON THIS PROGRAM AND INCLUDE LANGUAGE ON THE MSRC'S WEBSITE TO THE EFFECT THAT WHILE THE PROGRAM ANNOUNCEMENT REMAINS OPEN AND AS SUCH APPLICATIONS WILL CONTINUE TO BE ACCEPTED PLEASE NOTE THE PROGRAM HAS ALREADY BEEN OVERSUBSCRIBED AND THUS FUNDING IS NOT GUARANTEED.

**ACTION:** AQMD staff will submit these contract awards to the AQMD Board for approval at its July 13, 2012 Board meeting.

**Item #11 – Consider Next Steps for Implementation of Rideshare Incentives Program**

[This item was taken out of order after Item #12.]

Ray Gorski explained that the Subcommittee chair, Kelly Lynn, couldn't be present today so he would be presenting her item. The MSRC approved implementation of a rideshare incentive program to promote "Rideshare Thursday." This theme has been around for a long time but not promoted in recent years, and the MSRC felt it needed another campaign to promote alternative commute modes. While Rideshare Thursday is the theme, the actual campaign will be developed by an outside vendor, and the solicitation seeking bids closes next week. In fact, it is anticipated that the MSRC-TAC will make a recommendation to the MSRC at its August meeting. Mr. Gorski further explained that this program, however, has two components. The first is the actual advertising campaign to promote Rideshare Thursday. The second is to offer incentives to get people to get out of their solo vehicles and try ridesharing. The MSRC-TAC recommends that the CTCs implement the incentive portion. After all, they already manage 501 programs, ride-matching services, and the go-to organizations if anyone needs ridesharing assistance. The MSRC originally allocated \$500,000 for the incentives and the MSRC-TAC recommends these funds be split evenly among the four CTCs. The Subcommittee proposes that the MSRC request that each CTC submit a concise workplan on how their funding can best be utilized in their county. The workplans would then be evaluated and brought forward to the MSRC for consideration. Although a regional program was considered, it was recognized that there would

still be a need to tailor it for each region. Staff simply wants the MSRC's approval to move forward with this process as described.

MSRC Chair Greg Winterbottom asked what if a county doesn't spend their \$125,000 allocation. Can another county utilize it? Mr. Gorski replied that it is anticipated that the \$125,000 will simply be seed money and that each CTC will have to add their own money to implement a Rideshare Thursday Program in their region.

Mr. Winterbottom asked when the workplans would be due. Mr. Gorski replied we're proposing October 22, 2012, but programs probably wouldn't start until the second half of 2013 because the MSRC has to develop and launch its ad campaign including electronic, print and social media. The latter will be a new component because the last time the MSRC launched a rideshare ad campaign, there was no social media.

ON MOTION BY MSRC MEMBER RON ROBERTS, AND SECONDED BY MSRC VICE-CHAIR GREG PETTIS, THE MSRC UNANIMOUSLY APPROVED ALLOCATING \$500,000 TO BE DISTRIBUTED EQUALLY BETWEEN THE FOUR COUNTY TRANSPORTATION COMMISSIONS (CTCS); THE MSRC FURTHER APPROVED THE RECOMMENDATION REQUIRING EACH CTC TO SUBMIT A CONCISE WORKPLAN FOR FUTURE TCM SUBCOMMITTEE REVIEW AND MSRC APPROVAL PRIOR TO THE AWARD OF FUNDS.

**ACTION:** MSRC staff will move forward accordingly to work with the CTCs. When the MSRC is ready to award contracts to the CTCs, their recommendation will be taken to the AQMD Board at that time.

#### **Item #12 – Consider Work Program to Implement CNG Taxicab Incentives**

Ray Gorski explained that the MSRC had approved a program set aside to be in partnership with CEC to offer \$6,000 taxicab incentives. It was anticipated that CEC would join us because it would be a petroleum displacement program for them, but the CEC has declined to participate. The MSRC-TAC recommends moving forward with a program solely funded by the MSRC providing \$3,000 incentives per qualifying vehicle. When the MSRC approved the program, no specifics were approved at that time. The Subcommittee met this week and recommends implementation similar to the AQMD's taxicab program. The AQMD will work with taxicab fleets and distribute the funding on the MSRC's behalf. MSRC staff will offer assistance and ensure availability of the incentives is widely promoted. The program would establish a geographic county minimum of \$93,000 using the traditional formula of dividing the funds in half then dividing by four. The handout with the green cover outlines how the program will be jointly handled by AQMD and MSRC and how roles and responsibilities will be divided between the two.

MSRC Member Ron Roberts noted that in the past old police cars were simply retrofitted with CNG packages, but Ford isn't making those vehicles anymore. He is concerned that because this program now requires new vehicles that the incentive won't be sufficient to attract any taxicab

owners. Mr. Gorski replied it is at the MSRC's discretion to change amount if they desire to do so.

Henry Hogo, AQMD Asst. DEO/Science & Technology Advancement, commented that when the AQMD renewed its the taxicab program the CEC was only offering \$3,000 so the decision was made to partner with the CEC and match their incentive for a total of \$6,000. However, a private entity is considering offering a buydown which could be coupled with the MSRCs. Additionally, there's a box-shaped vehicle being used for taxis and our understanding is that the cost is cheaper than Crown Victoria. MSRC-TAC Member Dean Saito replied that the incremental cost from gasoline to CNG is about \$10,000.

MSRC Chair Winterbottom echoed Mr. Robert's concern that a \$3,000 incentive may be insufficient to attract takers. Mr. Hogo suggested moving forward to test the waters. Mr. Saito replied there are a lot of cities and airport authorities mandating alternative fuel and hybrid taxis so many of the taxicab companies are being forced to buy these vehicles anyways.

Mr. Winterbottom asked if they are getting good mileage. Mr. Hogo replied that the Honda CNG Civic purportedly gets 200 miles on a tank. Mr. Saito noted that there is another cost benefit; CNG is about \$1.50 per gallon cheaper than gasoline.

Mr. Winterbottom Greg asked when the incentive program would close. Mr. Gorski replied that there will be no sunset; the program would remain open so long as money is available.

**ACTION:** Mr. Winterbottom asked that staff provide monthly updates on the program's progress. Mr. Gorski replied that updates will be included in the Contracts Administrator's monthly report.

ON MOTION BY MSRC MEMBER RON ROBERTS, AND SECONDED BY MSRC ALTERNATE BRAD MCALLISTER, THE MSRC UNANIMOUSLY APPROVED ESTABLISHING A TAXICAB INCENTIVE PROGRAM WITH NO SUNSET SO LONG AS FUNDING IS AVAILABLE OFFERING A \$3,000 INCENTIVE PER NEW ALTERNATIVE FUEL TAXICAB INCLUDING A GEOGRAPHIC MINIMUM OF \$93,000 PER COUNTY AND WHICH WILL BE ADMINISTERED JOINTLY BY AQMD AND MSRC STAFF.

**ACTION:** AQMD staff will submit approval of this program and funding allocation to the AQMD Board for approval at its July 13, 2012 Board meeting.

### **Item #13 – OTHER BUSINESS**

Ray Gorski pointed out that the AQMD Board will not meet in August, which means that any action the MSRC would take in July can't be considered by the AQMD Board until September. This begs the question as to whether the MSRC wants to meet in July at all. MSRC Member Ron Roberts noted he wouldn't be able to attend a July MSRC meeting anyways. The consensus was that the MSRC and MSRC-TAC meetings for July should be canceled. **ACTION:** Staff will send out an email notice to all members and update to the MSRC's website to reflect the meeting cancellation.

Mr. Gorski reminded the MSRC that six mini-workshops to assist with development of the next work program will be conducted throughout the counties during the month of July. **ACTION:** MSRC Chair Winterbottom asked if staff can provide the MSRC members with the schedule for the workshops and to advise whether they need to conduct any outreach for the workshops in their areas.

MSRC Vice-Chair Greg Pettis asked when the Local Government Match Program is supposed to close. Cynthia Ravenstein replied the Match Program closes June 8 and award recommendations will be submitted to the MSRC for consideration in August. Based on applications to date staff believes the total amount requested will be nearly the targeted funding amount and the per county geographic minimums should be met or very close to it.

MSRC Chair Greg Winterbottom noted since there will be no July meetings, the next MSRC meeting will be on August 16, 2012.

### **ADJOURNMENT**

THERE BEING NO FURTHER BUSINESS, THE MSRC MEETING ADJOURNED  
AT 2:42 P.M.

[Minutes prepared by Drue Hargis]



MSRC Agenda Item No. 3

**DATE:** August 16, 2012

**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 May 31 through July 25, 2012.

**RECOMMENDATION:** Receive and file report

**WORK PROGRAM IMPACT:** None

**Contract Execution Status**

**2011-12 Work Program**

On April 6, 2012, the AQMD Governing Board approved an award to the Los Angeles County Metropolitan Transportation Authority under the Event Center Transportation Program and an award to Mansfield Gas Equipment Systems under the Home Refueling Apparatus Purchase Incentive Program. The Event Center contract is with the prospective contractor for signature. The award to Mansfield is being combined with AQMD funding and included in AQMD's contract, which is with the prospective contractor for signature.

On May 4, 2012, the AQMD Governing Board approved two awards to Orange County Transportation Authority under the Event Center Transportation Program. One contract is executed; the other is undergoing internal review.

On June 1, 2012, the AQMD Governing Board approved nine awards under the Alternative Fuel Infrastructure Program and eleven awards under the Local Government Match Program. These contracts are under development.

On July 13, 2012, the AQMD Governing Board approved an award under the Alternative Fuel Infrastructure Program and twelve awards under the Medium-Duty and Medium-Heavy-Duty Vehicles Program. These contracts are under development.

**2010-11 Work Program**

On March 4, 2011, the AQMD Governing Board approved an award to the Los Angeles County Metropolitan Transportation Authority under the Event Center Transportation Program. This contract is executed.

On April 1, 2011, the AQMD Governing Board approved an award to the Orange County Transportation Authority for Orange County Fair service under the Event Center Transportation Program. This contract is executed.

On May 6, 2011, the AQMD Governing Board approved an award to the Orange County Transportation Authority for Angels game service under the Event Center Transportation Program, as well as two awards under the Alternative Fuel School Bus Incentive Program. These contracts are executed.

On June 3, 2011, the AQMD Governing Board approved 10 awards under the Alternative Fuel Infrastructure Program, as well as an award to Coachella Valley Association of Governments under the Local Government Match Program, as part of the MSRC's FY 2010-11 Work Program. These contracts are under development, awaiting clarifying information, or executed.

On September 9, 2011, the AQMD Governing Board approved: an award under the Alternative Fuel Infrastructure Program; 26 awards under the Local Government Match Program; 9 awards under the Alternative Fuel On-Road Engines Program; an award under the Off-Road Heavy-Duty Vehicles Program; an award to the Better World Group for programmatic outreach services; and two awards for development and implementation of 511 "smart phone" applications. These contracts are under development, awaiting additional information, with the prospective contractor for signature, or executed. MSRC staff has been informed, and is attempting to obtain confirmation, that 8 of the 9 On-Road Engines awards will be declined.

On October 7, 2011, the AQMD Governing Board approved two awards under the Alternative Fuel Infrastructure Program and three awards under the "Showcase II" Off-Road After-treatment Demonstration Program. These contracts are under development, undergoing internal reviews, with the prospective contractor for signature or executed.

On November 4, 2011, the AQMD Governing Board approved one award under the Alternative Fuel Infrastructure Program and one award under the Major Event Center Transportation Program, as part of the MSRC's FY 2010-11 Work Program. These contracts are with the prospective contractor for signature or executed.

On December 2, 2011, the AQMD Governing Board approved: 10 awards under the Alternative Fuel Infrastructure Program; one award under the Major Event Center Transportation Program; and three awards under the "Showcase II" Off-Road After-treatment Demonstration Program. These contracts are awaiting clarifying information, undergoing internal review, with the prospective contractor for signature, or executed.

On April 6, 2012, the AQMD Governing Board approved: five awards under the "Showcase II" Off-Road After-treatment Demonstration Program. These contracts are under development, undergoing internal review or with the prospective contractor for signature.

On June 1, 2012, the AQMD Governing Board approved nine awards under the "Showcase II" Off-Road After-treatment Demonstration Program. These contracts are under development.

### **2009-10 Work Program**

Except as discussed below, contracts for this Work Program are executed or declined.

On July 9, 2010, the AQMD Governing Board approved 21 awards under the Heavy-Duty Alternative Fuel Engines for On-Road Vehicles Program as part of the FY 2009-10 Work Program. These contracts are with the prospective contractor for signature or executed.

### **Work Program Status**

Contract Status Reports for work program years with open and pending contracts are attached. MSRC or MSRC-TAC members may request spreadsheets covering any other work program year.

#### ***FY 2003-04 Work Program Contracts***

One regular contract from this work program year is open. All Local Government Match Program contracts are now closed.

#### ***FY 2003-04 Regular Work Program Invoices Paid***

No invoices were paid during this period.

#### ***FY 2004-05 Work Program Contracts***

All regular work program contracts are now closed. Two Local Match contracts from this work program year are open. All Diesel Exhaust After-treatment contracts are now closed.

#### ***FY 2004-05 Local Government Match Program Invoices Paid***

No invoices were paid during this period.

#### ***FY 2005-06 Work Program Contracts***

1 regular, 7 Local Match, and one Diesel Exhaust After-treatment contracts from this work program year are open; and 10 regular and 27 Local Match contracts are in "Open/Complete" status, having completed all obligations save ongoing operation.

#### ***FY 2005-06 Regular Work Program Invoices Paid***

One invoice in the amount of \$55,500.00 was paid during this period.

#### ***FY 2005-06 Local Government Match Program Invoices Paid***

No invoices were paid during this period.

#### ***FY 2005-06 Diesel Exhaust After-treatment Program Invoices Paid***

No invoices were paid during this period.

#### ***FY 2006-07 Work Program Contracts***

10 regular and 5 Local Match contracts from this work program year are open; and 15 regular and 14 Local Match contracts are in "Open/Complete" status, having completed all obligations save ongoing operation. One contract closed during this period: County Sanitation Districts of L.A. County, Contract #MS07059 – "Showcase" off-road retrofit demonstrations.

#### ***FY 2006-07 Regular Work Program Invoices Paid***

No invoices were paid during this period.

#### ***FY 2006-07 Local Government Match Program Invoices Paid***

No invoices were paid during this period.



***FY 2007-08 Work Program Contracts***

16 regular and 11 Local Match contracts from this work program year are open; and 18 regular and 13 Local Match contracts are in “Open/Complete” status, having completed all obligations save ongoing operation. Three contracts passed into “Open/Complete” status during this period: Omnitrans, Contract #MS08017 – Purchase 30 CNG Buses; Go Natural Gas, Contract #MS08063 – Install New CNG Station in Moreno Valley; and County of San Bernardino Dept. of Public Works, Contract #ML08034 – Purchase 8 CNG Heavy-Duty Vehicles.

***FY 2007-08 Regular Work Program Invoices Paid***

One invoice in the amount of \$400,000.00 was paid during this period.

***FY 2007-08 Local Government Match Program Invoices Paid***

One invoice in the amount of \$150,000.00 was paid during this period.

***FY 2008-09 Work Program Contracts***

One regular and 19 Local Match contracts from this work program year are open; and 9 Local Match contracts are in “Open/Complete” status. Three contracts passed into “Open/Complete” status during this period: City of San Bernardino, Contract #ML09011 – Purchase 10 Natural Gas Heavy Duty Vehicles; County of San Bernardino Dept. of Public Works, Contract #ML09016 – Install New CNG Station; and City of Los Angeles, Bureau of Sanitation, Contract #ML09041 – Purchase 35 Natural Gas Heavy Duty Vehicles.

***FY 2008-09 Regular Work Program Invoices Paid***

No invoices were paid during this period.

***FY 2008-09 Local Government Match Program Invoices Paid***

Three invoices totaling \$925,000.00 were paid during this period.

***FY 2009-10 Work Program Contracts***

16 regular contracts from this work program year are open. One contract passed into “Open/Complete” status during this period: American Reclamation, Contract #MS10020 – Purchase One Heavy-Duty CNG Vehicle.

***FY 2009-10 Regular Work Program Invoices Paid***

Four invoices totaling \$151,615.71 were paid during this period.

***FY 2010-11 Work Program Contracts***

17 regular and 20 Local Match contracts from this work program year are open.

***FY 2010-11 Regular Work Program Invoices Paid***

Six invoices totaling \$243,193.50 were paid during this period.

***FY 2010-11 Local Government Match Program Invoices Paid***

Three invoices totaling \$469,200.00 were paid during this period.

***Administrative Scope Changes***

One administrative scope change was initiated during the period of May 31 through July 25, 2012:

- MS11056 – The Better World Group (MSRC Programmatic Outreach) – Modify Payment Schedule, with no change in overall contract value, to add a new employee and specify the estimated number of labor hours to be provided by each employee.

**Attachments**

- FY 2003-04 through FY 2010-11 Contract Status Reports



# AB2766 Discretionary Fund Program Invoices

May 31, 2012 to July 25, 2012

Contract Admin.	MSRC Chair	MSRC Liaison	Finance	Contract #	Contractor	Invoice #	Amount Paid
<b>2007-2008 Work Program</b>							
6/14/2012	6/21/2012	6/21/2012	6/26/2012	ML08034	County of San Bernardino Public Works	3CPW 2-FIN/	\$150,000.00
6/21/2012	6/21/2012	6/21/2012	6/26/2012	MS08063	Go Natural Gas	14344	\$400,000.00
<b>Total: \$550,000.00</b>							
<b>2008-2009 Work Program</b>							
6/7/2012	6/8/2012	6/12/2012	6/13/2012	ML09011	City of San Bernardino	1-Final	\$250,000.00
6/15/2012	6/21/2012	6/21/2012	6/26/2012	ML09041	City of Los Angeles, Bureau of Sanitation	2 - Final	\$625,000.00
6/14/2012	6/21/2012	6/21/2012	6/26/2012	ML09016	County of San Bernardino Public Works	BCPW 2-Fin.	\$50,000.00
<b>Total: \$925,000.00</b>							
<b>2009-2010 Work Program</b>							
7/12/2012	7/24/2012	7/25/2012	7/26/2012	MS10011	Foothill Transit Agency	0615-12	\$102,478.50
6/21/2012	6/21/2012	6/21/2012	6/26/2012	MS10025	Elham Shirazi	13	\$4,539.91
5/31/2012	6/8/2012	6/12/2012	6/13/2012	MS10024	Frito-Lay North America	1	\$42,699.60
6/7/2012	6/8/2012	6/12/2012	6/13/2012	MS10020	American Reclamation, Inc.	Final	\$1,897.70
<b>Total: \$151,615.71</b>							
<b>2010-2011 Work Program</b>							
7/17/2012	7/24/2012	7/25/2012	7/26/2012	ML11028	City of Glendale	2012-1	\$60,000.00
6/19/2012	6/21/2012	6/21/2012	6/26/2012	MS11001	Mineral LLC	104328	\$300.00
7/24/2012	7/24/2012	7/25/2012		MS11001	Mineral LLC	104361	\$300.00
7/17/2012	7/24/2012	7/25/2012	7/26/2012	ML11031	City of Culver City Transportation Department	.11031-01 Fil	\$300,000.00
7/17/2012	7/24/2012	7/25/2012	7/26/2012	ML11030	City of Fullerton	1 Final	\$109,200.00
6/6/2012	6/8/2012	6/12/2012	6/13/2012	MS11006	Orange County Transportation Authority	FR134433	\$160,713.00
6/6/2012	6/8/2012	6/12/2012	6/13/2012	MS11004	Los Angeles County MTA	800050948	\$21,139.50
6/6/2012	6/8/2012	6/12/2012	6/13/2012	MS11004	Los Angeles County MTA	800050947	\$25,542.00
6/6/2012	6/8/2012	6/12/2012	6/13/2012	MS11004	Los Angeles County MTA	800050943	\$35,199.00
<b>Total: \$712,393.50</b>							

**Total This Period: \$2,339,009.21**

## 2003-04 AB2766 Contract Status Report

8/8/2012

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
MS04063	Riverside County Transportation Co	6/3/2011	6/3/2012		\$225,000.00	\$0.00	Regional Rideshare Database Enhancement	\$225,000.00	No
<b>Total: 1</b>									
<b>Declined/Cancelled Contracts</b>									
MS04002	City of Riverside				\$58,096.00	\$0.00	3 Refuse Trucks, 3 Dump Trucks, 2 Water T	\$58,096.00	No
MS04051	NorthStar, Inc.				\$250,000.00	\$0.00	New LNG Station	\$250,000.00	No
MS04053	Clean Energy Fuels Corp.				\$250,000.00	\$0.00	New CNG Station - Mid-Wilshire	\$250,000.00	No
MS04054	Clean Energy Fuels Corp.				\$250,000.00	\$0.00	New CNG Station - Mission Viejo	\$250,000.00	No
<b>Total: 4</b>									
<b>Closed Contracts</b>									
MS04001	City of Ontario	8/27/2004	9/26/2005		\$35,082.00	\$35,082.00	2 CNG Refuse Trucks	\$0.00	Yes
MS04003	Long Beach Transit	8/27/2004	6/26/2006		\$335,453.00	\$330,453.00	27 Gasoline-Electric Hybrid Buses/Mech. Tr	\$5,000.00	Yes
MS04005	City of Norwalk Transportation Dept.	11/27/2004	1/27/2007		\$118,052.00	\$88,539.00	4 Gas-Electric Hybrid Vehicles	\$29,513.00	Yes
MS04006	Orange County Transportation Autho	10/1/2004	4/30/2006	7/31/2008	\$405,000.00	\$405,000.00	2 Gas-Electric Hybrid and 20 CNG Transit B	\$0.00	Yes
MS04007	Foothill Transit Agency	6/24/2005	11/23/2006		\$715,000.00	\$714,100.00	75 CNG Buses, Fueling Station	\$900.00	No
MS04008	Los Angeles County MTA	11/1/2004	9/30/2007		\$854,050.00	\$854,050.00	50 CNG Buses	\$0.00	Yes
MS04017	Road Builders, Inc.	10/13/2004	4/12/2006	12/31/2006	\$953,080.00	\$953,080.00	Repower 12 Scrapers & 1 Loader	\$0.00	Yes
MS04027	Larry Jacinto Construction	9/13/2004	3/12/2006		\$454,510.00	\$454,510.00	Repower 6 Scrapers	\$0.00	Yes
MS04029	Herigstad Equipment Rental	9/16/2004	3/15/2006		\$1,190,024.00	\$830,172.00	Repower 10 Scrapers	\$359,852.00	Yes
MS04036	Sukut Equipment, Inc.	12/15/2004	2/15/2006		\$466,807.00	\$466,807.00	Repower 4 Scrapers & 3 Dozers	\$0.00	Yes
MS04039	CR&R, Inc.	1/25/2005	3/24/2007	2/24/2009	\$463,168.00	\$461,550.00	30 LNG Refuse Trucks	\$1,618.00	Yes
MS04041	CR&R, Inc.	7/25/2005	9/24/2007	9/24/2008	\$155,468.00	\$153,850.00	10 LNG Refuse Trucks, Mechanic Training	\$1,618.00	Yes
MS04050	R.F. Dickson Co., Inc.	6/3/2005	6/2/2006	10/2/2007	\$250,000.00	\$250,000.00	Upgrade CNG Station	\$0.00	Yes
MS04052	Downs Energy	5/6/2005	6/5/2006	6/30/2009	\$250,000.00	\$250,000.00	New LNG/L-CNG Station	\$0.00	Yes
MS04058	American Honda Motor Company	11/2/2005	6/30/2007	3/31/2008	\$300,000.00	\$4,000.00	Home Refueling Apparatus Lease Incentives	\$296,000.00	Yes
MS04059	FuelMaker Corporation	9/9/2005	6/30/2006	12/31/2006	\$100,000.00	\$100,000.00	Home Refueling Apparatus Incentives	\$0.00	Yes
MS04062	Los Angeles County MTA	10/1/2010	3/31/2011		\$53,500.00	\$53,500.00	Regional Rideshare Database Enhancement	\$0.00	Yes
<b>Total: 17</b>									
<b>Closed/Incomplete Contracts</b>									
MS04004	Athens Services, Inc.	9/3/2004	3/2/2006	9/2/2006	\$311,421.00	\$197,503.50	14 LNG Waste Haulers, Maint. Facility. Mod	\$113,917.50	No
MS04055	Riverside County Transportation Co	6/29/2006	8/28/2007	2/28/2008	\$225,000.00	\$0.00	Regional Rideshare Database Enhancement	\$225,000.00	No
MS04056	Los Angeles County MTA	6/13/2006	12/12/2007	1/12/2010	\$120,000.00	\$66,488.40	Regional Rideshare Database Enhancement	\$53,511.60	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS04061	Riverside County Transportation Co	6/29/2009	8/31/2010		\$225,000.00	\$0.00	Regional Rideshare Database Enhancement	\$225,000.00	No
<b>Total: 4</b>									

## 2004-05 AB2766 Local Government Match Program Contract Status Report

8/8/2012

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
ML05013	Los Angeles County Department of	1/5/2007	7/4/2008	1/4/2013	\$313,000.00	\$0.00	Traffic Signal Synchronization	\$313,000.00	No
ML05014	Los Angeles County Department of	5/21/2007	11/20/2008	12/30/2013	\$204,221.00	\$0.00	Traffic Signal Synchronization	\$204,221.00	No
<b>Total: 2</b>									
<b>Declined/Cancelled Contracts</b>									
ML05005	City of Highland				\$20,000.00	\$0.00	2 Medium Duty CNG Vehicles	\$20,000.00	No
ML05008	Los Angeles County Department of				\$140,000.00	\$0.00	7 Heavy Duty LPG Street Sweepers	\$140,000.00	No
ML05010	Los Angeles County Department of				\$20,000.00	\$0.00	1 Heavy Duty CNG Bus	\$20,000.00	No
<b>Total: 3</b>									
<b>Closed Contracts</b>									
ML05006	City of Colton Public Works	7/27/2005	7/26/2006		\$30,000.00	\$30,000.00	3 Medium Duty CNG Vehicles	\$0.00	Yes
ML05011	Los Angeles County Department of	8/10/2006	12/9/2007	6/9/2008	\$52,409.00	\$51,048.46	3 Heavy Duty LPG Shuttle Vans	\$1,360.54	Yes
ML05015	City of Lawndale	7/27/2005	7/26/2006		\$10,000.00	\$10,000.00	1 Medium Duty CNG Vehicle	\$0.00	Yes
ML05016	City of Santa Monica	9/23/2005	9/22/2006	9/22/2007	\$350,000.00	\$350,000.00	6 MD CNG Vehicles, 1 LPG Sweep, 13 CNG	\$0.00	Yes
ML05017	City of Signal Hill	1/16/2006	7/15/2007		\$126,000.00	\$126,000.00	Traffic Signal Synchronization	\$0.00	Yes
ML05018	City of San Bernardino	4/19/2005	4/18/2006		\$40,000.00	\$40,000.00	4 M.D. CNG Vehicles	\$0.00	Yes
ML05019	City of Lakewood	5/6/2005	5/5/2006		\$10,000.00	\$10,000.00	1 M.D. CNG Vehicle	\$0.00	Yes
ML05020	City of Pomona	6/24/2005	6/23/2006		\$10,000.00	\$10,000.00	1 M.D. CNG Vehicle	\$0.00	Yes
ML05021	City of Whittier	7/7/2005	7/6/2006	4/6/2008	\$100,000.00	\$80,000.00	Sweeper, Aerial Truck, & 3 Refuse Trucks	\$20,000.00	Yes
ML05022	City of Claremont	9/23/2005	9/22/2006		\$20,000.00	\$20,000.00	2 M.D. CNG Vehicles	\$0.00	Yes
ML05024	City of Cerritos	4/18/2005	3/17/2006		\$10,000.00	\$10,000.00	1 M.D. CNG Vehicle	\$0.00	Yes
ML05025	City of Malibu	5/6/2005	3/5/2006		\$10,000.00	\$10,000.00	1 Medium-Duty CNG Vehicle	\$0.00	Yes
ML05026	City of Inglewood	1/6/2006	1/5/2007	2/5/2009	\$60,000.00	\$60,000.00	2 CNG Transit Buses, 1 CNG Pothole Patch	\$0.00	Yes
ML05027	City of Beaumont	2/23/2006	4/22/2007	6/22/2010	\$20,000.00	\$20,000.00	1 H.D. CNG Bus	\$0.00	Yes
ML05028	City of Anaheim	9/8/2006	9/7/2007	5/7/2008	\$85,331.00	\$85,331.00	Traffic signal coordination & synchronization	\$0.00	Yes
ML05029	Los Angeles World Airports	5/5/2006	9/4/2007		\$140,000.00	\$140,000.00	Seven CNG Buses	\$0.00	Yes
ML05071	City of La Canada Flintridge	1/30/2009	1/29/2011		\$20,000.00	\$20,000.00	1 CNG Bus	\$0.00	Yes
ML05072	Los Angeles County Department of	8/24/2009	5/23/2010	1/23/2011	\$349,000.00	\$349,000.00	Traffic Signal Synchronization (LADOT)	\$0.00	Yes
<b>Total: 18</b>									
<b>Closed/Incomplete Contracts</b>									
ML05007	Los Angeles County Dept of Beaches	6/23/2006	6/22/2007	12/22/2007	\$50,000.00	\$0.00	5 Medium Duty CNG Vehicles	\$50,000.00	No
ML05009	Los Angeles County Department of	6/22/2006	12/21/2007	9/30/2011	\$56,666.00	\$0.00	2 Propane Refueling Stations	\$56,666.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML05012	Los Angeles County Department of	11/10/2006	5/9/2008	1/9/2009	\$349,000.00	\$0.00	Traffic Signal Synchronization (LADOT)	\$349,000.00	No
ML05023	City of La Canada Flintridge	3/30/2005	2/28/2006	8/28/2008	\$20,000.00	\$0.00	1 CNG Bus	\$20,000.00	No

**Total: 4**





## 2005-06 AB2766 Local Government Match Program Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
ML06020	Los Angeles Department of Water a	3/19/2007	9/18/2013	4/18/2014	\$25,000.00	\$0.00	CNG Aerial Truck	\$25,000.00	No
ML06031	City of Inglewood	4/4/2007	6/3/2013	9/3/2015	\$150,000.00	\$65,602.40	Purchase 4 H-D LPG Vehicles & Install LPG	\$84,397.60	No
ML06035	City of Hemet, Public Works	11/10/2006	12/9/2012	10/9/2014	\$414,000.00	\$175,000.00	7 Nat Gas Trucks & New Nat Gas Infrastructure	\$239,000.00	No
ML06054	Los Angeles County Department of	6/17/2009	6/16/2016		\$150,000.00	\$0.00	3 CNG & 3 LPG HD Trucks	\$150,000.00	No
ML06058	City of Santa Monica	7/12/2007	7/11/2013		\$149,925.00	\$0.00	3 H.D. CNG Trucks & CNG Fueling Station	\$149,925.00	No
ML06060	City of Temple City	6/12/2007	6/11/2013		\$31,885.00	\$0.00	Upgrade existing CNG infrastructure	\$31,885.00	No
ML06070	City of Colton	4/30/2008	2/28/2015	4/30/2015	\$50,000.00	\$0.00	Two CNG Pickups	\$50,000.00	No
<b>Total: 7</b>									
<b>Declined/Cancelled Contracts</b>									
ML06018	Los Angeles County Dept of Beaches				\$375,000.00	\$0.00	New CNG Station & 2 CNG Dump Trucks	\$375,000.00	No
ML06019	Los Angeles County Dept of Beaches				\$250,000.00	\$0.00	New CNG Station & 2 CNG Dump Trucks	\$250,000.00	No
ML06023	City of Baldwin Park	6/16/2006	9/15/2012		\$20,000.00	\$0.00	CNG Dump Truck	\$20,000.00	No
ML06024	City of Pomona	8/3/2007	7/2/2013	7/2/2014	\$286,450.00	\$0.00	New CNG Station	\$286,450.00	No
ML06030	City of Burbank	3/19/2007	9/18/2011		\$287,700.00	\$0.00	New CNG Fueling Station	\$287,700.00	No
ML06037	City of Lynwood				\$25,000.00	\$0.00	1 Nat Gas Dump Truck	\$25,000.00	No
ML06039	City of Inglewood	2/9/2007	2/8/2008	4/8/2011	\$50,000.00	\$0.00	Modify Maintenance Facility for CNG Vehicle	\$50,000.00	No
ML06055	City of Los Angeles, Dept. of Genera				\$125,000.00	\$0.00	5 Gas-Electric Hybrid Buses	\$125,000.00	No
ML06059	City of Fountain Valley				\$25,000.00	\$0.00	One H.D. CNG Truck	\$25,000.00	No
<b>Total: 9</b>									
<b>Closed Contracts</b>									
ML06026	City of Cerritos	10/27/2006	9/26/2010		\$60,500.00	\$60,500.00	CNG Station Upgrade	\$0.00	Yes
ML06056	City of Los Angeles, Dept. of Genera	11/30/2007	11/29/2008		\$350,000.00	\$350,000.00	Maintenance Facility Mods.	\$0.00	Yes
<b>Total: 2</b>									
<b>Open/Complete Contracts</b>									
ML06016	City of Whittier	5/25/2006	5/24/2012	11/24/2012	\$50,000.00	\$50,000.00	2 CNG Refuse Trucks	\$0.00	Yes
ML06017	City of Claremont	8/2/2006	4/1/2012		\$50,000.00	\$50,000.00	2 CNG Refuse Trucks	\$0.00	Yes
ML06021	Los Angeles World Airports	9/13/2006	5/12/2013		\$150,000.00	\$150,000.00	6 CNG Buses	\$0.00	Yes
ML06022	City of Los Angeles, Bureau of Sanit	5/4/2007	1/3/2014		\$1,250,000.00	\$1,250,000.00	50 LNG Refuse Trucks	\$0.00	Yes
ML06025	City of Santa Monica	1/5/2007	11/4/2012	12/14/2014	\$300,000.00	\$300,000.00	12 H.D. CNG Vehicles	\$0.00	Yes
ML06027	City of Redondo Beach	9/5/2006	5/4/2012	10/4/2012	\$50,000.00	\$50,000.00	2 Heavy-Duty CNG Trucks	\$0.00	Yes
ML06028	City of Pasadena	9/29/2006	11/28/2012	3/28/2014	\$245,000.00	\$245,000.00	New CNG Station & Maint. Fac. Upgrades	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML06029	City of Culver City Transportation De	9/29/2006	12/28/2012		\$50,000.00	\$50,000.00	2 CNG Heavy-Duty Trucks	\$0.00	Yes
ML06032	City of Rancho Cucamonga	2/13/2007	3/12/2013	2/12/2014	\$237,079.00	\$237,079.00	New CNG Station & 2 CNG Dump Trucks	\$0.00	Yes
ML06033	City of Cathedral City	11/17/2006	12/16/2012	12/16/2013	\$125,000.00	\$125,000.00	5 Heavy-Duty CNG Trucks	\$0.00	Yes
ML06034	City of South Pasadena	9/25/2006	9/24/2012		\$16,422.42	\$16,422.42	2 Nat. Gas Transit Buses	\$0.00	Yes
ML06036	City of Riverside	3/23/2007	3/22/2013		\$200,000.00	\$200,000.00	8 Heavy-Duty Nat Gas Vehicles	\$0.00	Yes
ML06038	City of Los Angeles, Department of	5/21/2007	1/20/2014		\$625,000.00	\$625,000.00	25 CNG Street Sweepers	\$0.00	Yes
ML06044	City of Pomona	12/15/2006	3/14/2013		\$50,000.00	\$50,000.00	2 CNG Street Sweepers	\$0.00	Yes
ML06052	City of Hemet, Public Works	4/20/2007	2/19/2013		\$25,000.00	\$25,000.00	Purchase One CNG Dump Truck	\$0.00	Yes
ML06053	City of Burbank	5/4/2007	7/3/2013		\$125,000.00	\$125,000.00	Five Nat. Gas Refuse Trucks	\$0.00	Yes
ML06057	City of Rancho Cucamonga	8/28/2007	6/27/2013	8/27/2014	\$100,000.00	\$100,000.00	4 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML06061	City of Chino Hills	4/30/2007	4/29/2013		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
ML06062	City of Redlands	5/11/2007	5/10/2013		\$100,000.00	\$100,000.00	4 H.D. LNG Vehicles	\$0.00	Yes
ML06063	City of Moreno Valley	3/23/2007	11/22/2012		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
ML06064	City of South Pasadena	1/25/2008	11/24/2013	11/24/2014	\$50,000.00	\$50,000.00	2 H.D. CNG Vehicles	\$0.00	Yes
ML06065	City of Walnut	6/29/2007	6/28/2013		\$44,203.00	\$44,203.00	Upgrade Existing CNG Infrastructure	\$0.00	Yes
ML06066	City of Ontario	5/30/2007	1/29/2013		\$125,000.00	\$125,000.00	5 H.D. CNG Vehicles	\$0.00	Yes
ML06067	City of El Monte	3/17/2008	5/16/2014	11/16/2014	\$157,957.00	\$157,957.00	Upgrade existing CNG infrastructure	\$0.00	Yes
ML06068	City of Claremont	8/28/2007	6/27/2013		\$60,000.00	\$60,000.00	Expand existing CNG infrastructure	\$0.00	Yes
ML06069	City of Palos Verdes Estates	11/19/2007	11/18/2013		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes

**Total: 26**



## 2005-06 Diesel Exhaust Retrofit Program Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
PT06006	Los Angeles County Sheriff's Depart	5/15/2006	2/14/2008		\$98,000.00	\$0.00	Diesel Exhaust Aftertreatment Program	\$98,000.00	No
<b>Total: 1</b>									
<b>Closed Contracts</b>									
PT06005	Los Angeles County Department of	6/29/2006	3/28/2008	12/28/2008	\$184,500.00	\$184,500.00	Diesel Exhaust Aftertreatment Program	\$0.00	Yes
PT06007	County Sanitation Districts of L.A. C	6/16/2006	12/15/2007	12/28/2008	\$108,000.00	\$108,000.00	Diesel Exhaust Aftertreatment Program	\$0.00	Yes
PT06008	City of Los Angeles, Bureau of Sanit	9/6/2006	6/5/2008		\$184,500.00	\$184,500.00	Diesel Exhaust Aftertreatment Program	\$0.00	Yes
PT06014	Los Angeles Department of Water a	2/8/2007	8/7/2008	9/30/2009	\$112,500.00	\$103,500.00	Diesel Exhaust Aftertreatment Program	\$9,000.00	Yes
PT06015	City of San Bernardino	10/23/2006	4/22/2008		\$66,000.00	\$66,000.00	Diesel Exhaust Aftertreatment Program	\$0.00	Yes
<b>Total: 5</b>									

## 2006-07 AB2766 Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
MS07008	City of Los Angeles, Department of T	9/18/2009	5/17/2020		\$2,040,000.00	\$0.00	Purchase 102 Transit Buses	\$2,040,000.00	No
MS07022	California State University, Los Ange	10/30/2009	12/29/2015	12/29/2016	\$250,000.00	\$0.00	New Hydrogen Fueling Station	\$250,000.00	No
MS07060	Community Recycling & Resource R	3/7/2008	1/6/2010	7/6/2011	\$177,460.00	\$98,471.00	Off-Road Diesel Equipment Retrofit Program	\$78,989.00	No
MS07061	City of Los Angeles, Department of	10/31/2008	8/30/2010	2/28/2013	\$40,626.00	\$40,626.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	No
MS07070	Griffith Company	4/30/2008	2/28/2010	8/28/2012	\$168,434.00	\$125,504.00	Off-Road Diesel Equipment Retrofit Program	\$42,930.00	No
MS07071	Tiger 4 Equipment Leasing	9/19/2008	7/18/2010	1/18/2013	\$210,937.00	\$108,808.97	Off-Road Diesel Equipment Retrofit Program	\$102,128.03	No
MS07076	Reed Thomas Company, Inc.	8/15/2008	6/14/2010	3/14/2012	\$339,073.00	\$100,540.00	Off-Road Diesel Equipment Retrofit Program	\$238,533.00	No
MS07079	Riverside County Transportation Co	1/30/2009	7/29/2013	12/31/2011	\$20,000.00	\$13,785.45	BikeMetro Website Migration	\$6,214.55	No
MS07080	City of Los Angeles, Bureau of Sanit	10/31/2008	8/30/2010	8/28/2013	\$63,192.00	\$52,265.00	Off-Road Diesel Equipment Retrofit Program	\$10,927.00	No
<b>Total: 9</b>									
<b>Declined/Cancelled Contracts</b>									
MS07010	Palos Verdes Peninsula Transit Auth				\$80,000.00	\$0.00	Repower 4 Transit Buses	\$80,000.00	No
MS07014	Clean Energy Fuels Corp.				\$350,000.00	\$0.00	New L/CNG Station - SERRF	\$350,000.00	No
MS07015	Baldwin Park Unified School District				\$57,500.00	\$0.00	New CNG Station	\$57,500.00	No
MS07016	County of Riverside Fleet Services D				\$36,359.00	\$0.00	New CNG Station - Rubidoux	\$36,359.00	No
MS07017	County of Riverside Fleet Services D				\$33,829.00	\$0.00	New CNG Station - Indio	\$33,829.00	No
MS07018	City of Cathedral City				\$350,000.00	\$0.00	New CNG Station	\$350,000.00	No
MS07021	City of Riverside				\$350,000.00	\$0.00	New CNG Station	\$350,000.00	No
MS07050	Southern California Disposal Co.				\$320,000.00	\$0.00	Ten Nat. Gas Refuse Trucks	\$320,000.00	No
MS07062	Caltrans Division of Equipment				\$1,081,818.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$1,081,818.00	No
MS07065	ECCO Equipment Corp.				\$174,525.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$174,525.00	No
MS07067	Recycled Materials Company of Calif				\$99,900.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$99,900.00	No
MS07069	City of Burbank	5/9/2008	3/8/2010	9/8/2011	\$8,895.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$8,895.00	No
MS07074	Albert W. Davies, Inc.	1/25/2008	11/24/2009		\$39,200.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$39,200.00	No
MS07081	Clean Diesel Technologies, Inc.				\$240,347.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$240,347.00	No
MS07082	DCL International, Inc.				\$153,010.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$153,010.00	No
MS07083	Dinex Exhausts, Inc.				\$52,381.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$52,381.00	No
MS07084	Donaldson Company, Inc.				\$42,416.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$42,416.00	No
MS07085	Engine Control Systems Limited				\$155,746.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$155,746.00	No
MS07086	Huss, LLC				\$84,871.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$84,871.00	No
MS07087	Mann+Hummel GmbH				\$189,361.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$189,361.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS07088	Nett Technologies, Inc.				\$118,760.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$118,760.00	No
MS07089	Rypos, Inc.				\$68,055.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$68,055.00	No
MS07090	Sud-Chemie				\$27,345.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$27,345.00	No

**Total: 23**

**Closed Contracts**

MS07001	A-Z Bus Sales, Inc.	12/28/2006	12/31/2007	2/29/2008	\$1,920,000.00	\$1,380,000.00	CNG School Bus Buydown	\$540,000.00	Yes
MS07002	BusWest	1/19/2007	12/31/2007	3/31/2008	\$840,000.00	\$840,000.00	CNG School Bus Buydown	\$0.00	Yes
MS07005	S-W Compressors	3/17/2008	3/16/2010		\$60,000.00	\$7,500.00	Mountain CNG School Bus Demo Program-	\$52,500.00	Yes
MS07006	Coachella Valley Association of Gov	2/28/2008	10/27/2008		\$400,000.00	\$400,000.00	Coachella Valley PM10 Reduction Street Sw	\$0.00	Yes
MS07011	Los Angeles Service Authority for Fr	3/12/2010	5/31/2011	9/30/2011	\$700,000.00	\$700,000.00	"511" Commuter Services Campaign	\$0.00	Yes
MS07012	City of Los Angeles, General Service	6/13/2008	6/12/2009	6/12/2010	\$50,000.00	\$50,000.00	Maintenance Facility Modifications	\$0.00	Yes
MS07019	City of Cathedral City	1/9/2009	6/8/2010		\$32,500.00	\$32,500.00	Maintenance Facility Modifications	\$0.00	Yes
MS07058	The Better World Group	11/17/2007	11/16/2009	11/16/2011	\$247,690.00	\$201,946.21	MSRC Programmatic Outreach Services	\$45,743.79	Yes
MS07059	County Sanitation Districts of L.A. C	9/5/2008	9/4/2010	7/14/2012	\$231,500.00	\$231,500.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07063	Shimmick Construction Company, In	4/26/2008	2/25/2010	8/25/2011	\$80,800.00	\$11,956.37	Off-Road Diesel Equipment Retrofit Program	\$68,843.63	No
MS07064	Alfillisch Contractors, Inc.	9/19/2008	7/18/2010	1/18/2011	\$160,000.00	\$155,667.14	Off-Road Diesel Equipment Retrofit Program	\$4,332.86	Yes
MS07068	Sukut Equipment Inc.	1/23/2009	11/22/2010	5/22/2012	\$26,900.00	\$26,900.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07072	City of Culver City Transportation De	4/4/2008	2/3/2010	8/3/2011	\$72,865.00	\$72,865.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07075	Dan Copp Crushing	9/17/2008	7/16/2010	1/16/2012	\$73,600.00	\$40,200.00	Off-Road Diesel Equipment Retrofit Program	\$33,400.00	No
MS07091	BusWest	10/16/2009	3/15/2010		\$33,660.00	\$33,660.00	Provide Lease for 2 CNG School Buses	\$0.00	Yes
MS07092	Riverside County Transportation Co	9/1/2010	10/31/2011		\$350,000.00	\$350,000.00	"511" Commuter Services Campaign	\$0.00	Yes

**Total: 16**

**Closed/Incomplete Contracts**

MS07004	BusWest	7/2/2007	7/1/2009		\$90,928.00	\$68,196.00	Provide Lease for 2 CNG School Buses	\$22,732.00	No
MS07066	Skanska USA Civil West California D	6/28/2008	4/27/2010	10/27/2010	\$111,700.00	\$36,128.19	Off-Road Diesel Equipment Retrofit Program	\$75,571.81	No
MS07073	PEED Equipment Co.	10/31/2008	8/30/2010		\$11,600.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$11,600.00	No

**Total: 3**

**Open/Complete Contracts**

MS07003	Westport Fuel Systems, Inc.	11/2/2007	12/31/2011	6/30/2013	\$1,500,000.00	\$1,499,990.00	Advanced Nat. Gas Engine Incentive Progra	\$10.00	Yes
MS07007	Los Angeles World Airports	5/2/2008	11/1/2014		\$420,000.00	\$420,000.00	Purchase CNG 21 Transit Buses	\$0.00	Yes
MS07009	Orange County Transportation Autho	5/14/2008	4/13/2016		\$800,000.00	\$800,000.00	Purchase 40 Transit Buses	\$0.00	Yes
MS07013	Rainbow Disposal Company, Inc.	1/25/2008	3/24/2014		\$350,000.00	\$350,000.00	New High-Volume CNG Station	\$0.00	Yes
MS07020	Avery Petroleum	5/20/2009	7/19/2015		\$250,000.00	\$250,000.00	New CNG Station	\$0.00	Yes
MS07049	Palm Springs Disposal Services	10/23/2008	11/22/2014	9/22/2016	\$96,000.00	\$96,000.00	Three Nat. Gas Refuse Trucks	\$0.00	Yes
MS07051	City of San Bernardino	8/12/2008	12/11/2014		\$480,000.00	\$480,000.00	15 Nat. Gas Refuse Trucks	\$0.00	Yes
MS07052	City of Redlands	7/30/2008	11/29/2014		\$160,000.00	\$160,000.00	Five Nat. Gas Refuse Trucks	\$0.00	Yes
MS07053	City of Claremont	7/31/2008	12/30/2014		\$96,000.00	\$96,000.00	Three Nat. Gas Refuse Trucks	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS07054	Republic Services, Inc.	3/7/2008	9/6/2014	9/6/2016	\$1,280,000.00	\$1,280,000.00	40 Nat. Gas Refuse Trucks	\$0.00	Yes
MS07055	City of Culver City Transportation De	7/8/2008	9/7/2014		\$192,000.00	\$192,000.00	Six Nat. Gas Refuse Trucks	\$0.00	Yes
MS07056	City of Whittier	9/5/2008	3/4/2015		\$32,000.00	\$32,000.00	One Nat. Gas Refuse Trucks	\$0.00	Yes
MS07057	CR&R, Inc.	7/31/2008	8/30/2014	6/30/2015	\$896,000.00	\$896,000.00	28 Nat. Gas Refuse Trucks	\$0.00	No
MS07077	Waste Management Collection and	5/1/2009	12/31/2014		\$160,000.00	\$160,000.00	Five Nat. Gas Refuse Trucks (Santa Ana)	\$0.00	Yes
MS07078	Waste Management Collection and	5/1/2009	12/31/2014	12/31/2015	\$256,000.00	\$256,000.00	Eight Nat. Gas Refuse Trucks (Dewey's)	\$0.00	Yes

**Total: 15**



## 2006-07 AB2766 Local Government Match Program Contract Status Report

8/8/2012

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
ML07023	City of Riverside	6/20/2008	10/19/2014	7/19/2016	\$462,500.00	\$350,000.00	CNG Station Expansion/Purch. 14 H.D. Vehi	\$112,500.00	No
ML07033	City of La Habra	5/21/2008	6/20/2014	7/31/2017	\$75,000.00	\$25,000.00	One H.D. Nat Gas Vehicle/Expand Fueling S	\$50,000.00	No
ML07043	City of Redondo Beach	9/28/2008	7/27/2014	7/27/2016	\$125,000.00	\$0.00	Five H.D. CNG Transit Vehicles	\$125,000.00	No
ML07044	City of Santa Monica	9/8/2008	3/7/2015		\$600,000.00	\$50,000.00	24 H.D. Nat. Gas Vehicles	\$550,000.00	No
ML07045	City of Inglewood	2/6/2009	4/5/2015		\$75,000.00	\$25,000.00	3 H.D. Nat. Gas Vehicles	\$50,000.00	No
<b>Total: 5</b>									
<b>Declined/Cancelled Contracts</b>									
ML07031	City of Santa Monica				\$180,000.00	\$0.00	Upgrade N.G. Station to Add Hythane	\$180,000.00	No
ML07032	City of Huntington Beach Public Wor				\$25,000.00	\$0.00	One H.D. CNG Vehicle	\$25,000.00	No
ML07035	City of Los Angeles, General Service				\$350,000.00	\$0.00	New CNG Refueling Station/Southeast Yard	\$350,000.00	No
ML07038	City of Palos Verdes Estates				\$25,000.00	\$0.00	One H.D. LPG Vehicle	\$25,000.00	No
<b>Total: 4</b>									
<b>Closed Contracts</b>									
ML07025	City of San Bernardino	8/12/2008	7/11/2010		\$350,000.00	\$350,000.00	Maintenance Facility Modifications	\$0.00	Yes
ML07042	City of La Quinta	8/15/2008	9/14/2010		\$100,000.00	\$100,000.00	Street Sweeping Operations	\$0.00	Yes
ML07048	City of Cathedral City	9/19/2008	10/18/2010		\$100,000.00	\$84,972.45	Street Sweeping Operations	\$15,027.55	Yes
<b>Total: 3</b>									
<b>Open/Complete Contracts</b>									
ML07024	City of Garden Grove	3/7/2008	9/6/2014	7/6/2016	\$75,000.00	\$75,000.00	Three H.D. CNG Vehicles	\$0.00	Yes
ML07026	City of South Pasadena	6/13/2008	6/12/2014		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
ML07027	Los Angeles World Airports	6/3/2008	7/2/2014		\$25,000.00	\$25,000.00	One H.D. LNG Vehicle	\$0.00	Yes
ML07028	City of Los Angeles, General Service	3/13/2009	3/12/2014		\$350,000.00	\$350,000.00	New CNG Refueling Station/Hollywood Yard	\$0.00	Yes
ML07029	City of Los Angeles, General Service	3/13/2009	3/12/2014		\$350,000.00	\$350,000.00	New CNG Refueling Station/Venice Yard	\$0.00	Yes
ML07030	County of San Bernardino Public Wo	7/11/2008	9/10/2015		\$200,000.00	\$200,000.00	8 Natural Gas H.D. Vehicles	\$0.00	Yes
ML07034	City of Los Angeles, General Service	3/13/2009	3/12/2014		\$350,000.00	\$350,000.00	New CNG Refueling Station/Van Nuys Yard	\$0.00	Yes
ML07036	City of Alhambra	1/23/2009	2/22/2015		\$50,000.00	\$50,000.00	2 H.D. CNG Vehicles	\$0.00	Yes
ML07037	City of Los Angeles, General Service	10/8/2008	10/7/2015		\$255,222.00	\$255,222.00	Upgrade LNG/LCNG Station/East Valley Yar	\$0.00	Yes
ML07039	City of Baldwin Park	6/6/2008	6/5/2014	8/5/2015	\$50,000.00	\$50,000.00	Two N.G. H.D. Vehicles	\$0.00	Yes
ML07040	City of Moreno Valley	6/3/2008	9/2/2014		\$25,000.00	\$25,000.00	One Heavy-Duty CNG Vehicle	\$0.00	Yes
ML07041	City of La Quinta	6/6/2008	6/5/2014		\$25,000.00	\$25,000.00	One CNG Street Sweeper	\$0.00	Yes
ML07046	City of Culver City Transportation De	5/2/2008	5/1/2014		\$25,000.00	\$25,000.00	One H.D. Nat. Gas Vehicle	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML07047	City of Cathedral City	6/16/2008	9/15/2014	3/15/2015	\$225,000.00	\$225,000.00	Two H.D. Nat. Gas Vehicles/New CNG Fuel	\$0.00	Yes
<b>Total: 14</b>									



## 2007-08 AB2766 Contract Status Report

8/8/2012

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
MS08001	Los Angeles County MTA	12/10/2010	6/9/2014		\$1,500,000.00	\$416,666.66	Big Rig Freeway Service Patrol	\$1,083,333.34	No
MS08007	United Parcel Service	12/10/2008	10/9/2014		\$300,000.00	\$0.00	10 H.D. Nat. Gas Vehicles	\$300,000.00	No
MS08012	California Cartage Company, LLC	12/21/2009	10/20/2015	4/20/2016	\$480,000.00	\$432,000.00	12 H.D. Nat. Gas Yard Tractors	\$48,000.00	No
MS08013	United Parcel Service	12/10/2008	10/9/2014	10/9/2016	\$480,000.00	\$216,000.00	12 H.D. Nat. Gas Yard Tractors	\$264,000.00	No
MS08015	Yosemite Waters	5/12/2009	5/11/2015		\$180,000.00	\$117,813.60	11 H.D. Propane Vehicles	\$62,186.40	No
MS08018	Los Angeles County Department of	8/7/2009	10/6/2016		\$90,000.00	\$0.00	3 CNG Vehicles	\$90,000.00	No
MS08021	CallMet Services, Inc.	1/9/2009	1/8/2016	7/8/2016	\$900,000.00	\$810,000.00	30 CNG Vehicles	\$90,000.00	No
MS08056	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$240,000.00	New LNG Station - POLB-Anah. & I	\$160,000.00	No
MS08058	Clean Energy Fuels Corp.	11/26/2009	3/25/2016	3/25/2017	\$400,000.00	\$80,000.00	New CNG Station - Ontario Airport	\$320,000.00	No
MS08061	Clean Energy Fuels Corp.	12/4/2009	3/3/2015		\$400,000.00	\$240,000.00	New CNG Station - L.A.-La Cienega	\$160,000.00	No
MS08066	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$240,000.00	New CNG Station - Palm Spring Airport	\$160,000.00	No
MS08068	The Regents of the University of Cali	11/5/2010	11/4/2017		\$400,000.00	\$0.00	Hydrogen Station	\$400,000.00	No
MS08070	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$240,000.00	New CNG Station - Paramount	\$160,000.00	No
MS08072	Clean Energy Fuels Corp.	12/4/2009	3/3/2015		\$400,000.00	\$226,178.64	New CNG Station - Burbank	\$173,821.36	No
MS08073	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$240,000.00	New CNG Station - Norwalk	\$160,000.00	No
MS08078	SunLine Transit Agency	12/10/2008	6/9/2015	2/9/2016	\$189,000.00	\$0.00	CNG Station Upgrade	\$189,000.00	No
<b>Total: 16</b>									

### Declined/Cancelled Contracts

MS08002	Orange County Transportation Autho				\$1,500,000.00	\$0.00	Big Rig Freeway Service Patrol	\$1,500,000.00	No
MS08008	Diversified Truck Rental & Leasing				\$300,000.00	\$0.00	10 H.D. Nat. Gas Vehicles	\$300,000.00	No
MS08010	Orange County Transportation Autho				\$10,000.00	\$0.00	20 H.D. Nat. Gas Vehicles	\$10,000.00	No
MS08011	Green Fleet Systems, LLC				\$10,000.00	\$0.00	30 H.D. Nat. Gas Vehicles	\$10,000.00	No
MS08052	Burttec Waste Industries, Inc.	12/24/2008	11/23/2014	11/23/2015	\$100,000.00	\$0.00	New CNG Station - Fontana	\$100,000.00	No
MS08054	Clean Energy Fuels Corp.				\$400,000.00	\$0.00	New LNG Station - Fontana	\$400,000.00	No
MS08055	Clean Energy Fuels Corp.	11/26/2009	3/25/2016	3/25/2017	\$400,000.00	\$0.00	New LNG Station - Long Beach-Pier S	\$400,000.00	No
MS08059	Burttec Waste Industries, Inc.	12/24/2008	11/23/2014		\$100,000.00	\$0.00	New CNG Station - San Bernardino	\$100,000.00	No
MS08060	Burttec Waste Industries, Inc.	12/24/2008	11/23/2014		\$100,000.00	\$0.00	New CNG Station - Azusa	\$100,000.00	No
MS08062	Go Natural Gas	9/25/2009	1/24/2016	1/24/2017	\$400,000.00	\$0.00	New CNG Station - Rialto	\$400,000.00	No
MS08074	Fontana Unified School District	11/14/2008	12/13/2014		\$200,000.00	\$0.00	Expansion of Existing CNG station	\$200,000.00	No
MS08077	Hythane Company, LLC				\$144,000.00	\$0.00	Upgrade Station to Hythane	\$144,000.00	No
<b>Total: 12</b>									

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Closed Contracts</b>									
MS08003	A-Z Bus Sales, Inc.	5/2/2008	12/31/2008	2/28/2009	\$1,480,000.00	\$1,400,000.00	Alternative Fuel School Bus Incentive Progr	\$80,000.00	Yes
MS08004	BusWest	5/2/2008	12/31/2008		\$1,440,000.00	\$1,440,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	Yes
MS08016	TransVironmental Solutions, Inc.	1/23/2009	12/31/2010	9/30/2011	\$227,198.00	\$80,351.34	Rideshare 2 School Program	\$146,846.66	Yes
<b>Total: 3</b>									
<b>Closed/Incomplete Contracts</b>									
MS08079	ABC Unified School District	1/16/2009	12/15/2009	12/15/2010	\$50,000.00	\$0.00	Maintenance Facility Modifications	\$50,000.00	No
<b>Total: 1</b>									
<b>Open/Complete Contracts</b>									
MS08005	Burrtec Waste Industries, Inc.	10/23/2008	11/22/2014	10/22/2015	\$450,000.00	\$450,000.00	15 H.D. Nat. Gas Vehicles - Azusa	\$0.00	Yes
MS08006	Burrtec Waste Industries, Inc.	10/23/2008	11/22/2014	10/22/2015	\$450,000.00	\$450,000.00	15 H.D. Nat. Gas Vehicles - Saugus	\$0.00	Yes
MS08009	Los Angeles World Airports	12/24/2008	12/23/2014		\$870,000.00	\$870,000.00	29 H.D. Nat. Gas Vehicles	\$0.00	Yes
MS08014	City of San Bernardino	12/5/2008	6/4/2015		\$390,000.00	\$360,000.00	13 H.D. Nat. Gas Vehicles	\$30,000.00	Yes
MS08017	Omnitrans	12/13/2008	12/12/2015	12/12/2016	\$900,000.00	\$900,000.00	30 CNG Buses	\$0.00	Yes
MS08019	Enterprise Rent-A-Car Company of L	2/12/2010	7/11/2016		\$300,000.00	\$300,000.00	10 CNG Vehicles	\$0.00	Yes
MS08020	Ware Disposal Company, Inc.	11/25/2008	2/24/2016		\$900,000.00	\$900,000.00	30 CNG Vehicles	\$0.00	Yes
MS08022	SunLine Transit Agency	12/18/2008	3/17/2015		\$311,625.00	\$311,625.00	15 CNG Buses	\$0.00	Yes
MS08053	City of Los Angeles, Bureau of Sanit	2/18/2009	12/17/2015		\$400,000.00	\$400,000.00	New LNG/CNG Station	\$0.00	Yes
MS08057	Orange County Transportation Autho	5/14/2009	7/13/2015		\$400,000.00	\$400,000.00	New CNG Station - Garden Grove	\$0.00	Yes
MS08063	Go Natural Gas	9/25/2009	1/24/2016	1/24/2017	\$400,000.00	\$400,000.00	New CNG Station - Moreno Valley	\$0.00	Yes
MS08064	Hemet Unified School District	1/9/2009	3/8/2015		\$75,000.00	\$75,000.00	Expansion of Existing Infrastructure	\$0.00	Yes
MS08065	Pupil Transportation Cooperative	11/20/2008	7/19/2014		\$10,500.00	\$10,500.00	Existing CNG Station Modifications	\$0.00	Yes
MS08067	California Trillium Company	3/19/2009	6/18/2015		\$311,600.00	\$254,330.00	New CNG Station	\$57,270.00	Yes
MS08069	Perris Union High School District	6/5/2009	8/4/2015	8/4/2016	\$225,000.00	\$225,000.00	New CNG Station	\$0.00	Yes
MS08071	ABC Unified School District	1/16/2009	1/15/2015		\$63,000.00	\$63,000.00	New CNG Station	\$0.00	Yes
MS08075	Disneyland Resort	12/10/2008	2/1/2015		\$200,000.00	\$200,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS08076	Azusa Unified School District	10/17/2008	11/16/2014	11/16/2015	\$172,500.00	\$172,500.00	New CNG station and maint. Fac. Modificati	\$0.00	Yes
<b>Total: 18</b>									

## 2007-08 AB2766 Local Government Match Program Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
ML08024	City of Anaheim	7/9/2010	7/8/2017		\$425,000.00	\$225,000.00	9 LPG Buses and 8 CNG Buses	\$200,000.00	No
ML08025	Los Angeles County Department of	10/30/2009	3/29/2011		\$75,000.00	\$0.00	150 Vehicles (Diagnostic)	\$75,000.00	No
ML08027	Los Angeles County Department of	7/20/2009	1/19/2011	1/19/2012	\$6,901.00	\$0.00	34 Vehicles (Diagnostic)	\$6,901.00	No
ML08028	City of Santa Monica	9/11/2009	9/10/2016		\$600,000.00	\$0.00	24 CNG Heavy-Duty Vehicles	\$600,000.00	No
ML08030	City of Azusa	5/14/2010	3/13/2016		\$25,000.00	\$0.00	1 CNG Heavy-Duty Vehicle	\$25,000.00	No
ML08036	City of South Pasadena	5/12/2009	7/11/2013		\$169,421.00	\$0.00	New CNG Station	\$169,421.00	No
ML08038	Los Angeles Department of Water a	7/16/2010	7/15/2017		\$1,050,000.00	\$0.00	42 CNG Heavy-Duty Vehicles	\$1,050,000.00	No
ML08040	City of Riverside	9/11/2009	9/10/2016		\$505,500.00	\$0.00	16 CNG Vehicles; Expand CNG Station & M	\$505,500.00	No
ML08043	City of Desert Hot Springs	9/25/2009	3/24/2016		\$25,000.00	\$0.00	1 CNG Heavy-Duty Vehicle	\$25,000.00	No
ML08049	City of Cerritos	3/20/2009	1/19/2015	2/19/2017	\$25,000.00	\$0.00	1 CNG Heavy-Duty Vehicle	\$25,000.00	No
ML08080	City of Irvine	5/1/2009	5/31/2015		\$50,000.00	\$0.00	Two Heavy-Duty Nat. Gas Vehicles	\$50,000.00	No
<b>Total: 11</b>									
<b>Declined/Cancelled Contracts</b>									
ML08032	City of Irvine	5/1/2009	8/31/2010		\$9,000.00	\$0.00	36 Vehicles (Diagnostic)	\$9,000.00	No
ML08041	City of Los Angeles, Dept of Transpo	8/6/2010	7/5/2011	12/5/2011	\$8,800.00	\$0.00	73 Vehicles (Diagnostic)	\$8,800.00	No
ML08051	City of Colton				\$75,000.00	\$0.00	3 CNG Heavy-Duty Vehicles	\$75,000.00	No
<b>Total: 3</b>									
<b>Closed Contracts</b>									
ML08033	County of San Bernardino Public Wo	4/3/2009	2/2/2010		\$14,875.00	\$14,875.00	70 Vehicles (Diagnostic)	\$0.00	Yes
ML08035	City of La Verne	3/6/2009	1/5/2009		\$11,925.00	\$11,925.00	53 Vehicles (Diagnostic)	\$0.00	Yes
ML08045	City of Santa Clarita	2/20/2009	6/19/2010		\$3,213.00	\$3,150.00	14 Vehicles (Diagnostic)	\$63.00	Yes
<b>Total: 3</b>									
<b>Open/Complete Contracts</b>									
ML08023	City of Villa Park	11/7/2008	10/6/2012		\$6,500.00	\$5,102.50	Upgrade of Existing Refueling Facility	\$1,397.50	Yes
ML08026	Los Angeles County Department of	7/20/2009	7/19/2016		\$250,000.00	\$250,000.00	10 LPG Heavy-Duty Vehicles	\$0.00	No
ML08029	City of Gardena	3/19/2009	1/18/2015		\$25,000.00	\$25,000.00	1 Propane Heavy-Duty Vehicle	\$0.00	Yes
ML08031	City of Claremont	3/27/2009	3/26/2013	3/26/2015	\$97,500.00	\$97,500.00	Upgrade of Existing CNG Station, Purchase	\$0.00	Yes
ML08034	County of San Bernardino Public Wo	3/27/2009	7/26/2015		\$150,000.00	\$150,000.00	8 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08037	City of Glendale	5/20/2009	5/19/2015		\$325,000.00	\$325,000.00	13 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08039	City of Rancho Palos Verdes	6/5/2009	8/4/2015		\$50,000.00	\$50,000.00	2 LPG Transit Buses	\$0.00	Yes
ML08042	City of Ontario	5/1/2009	1/31/2016		\$175,000.00	\$175,000.00	7 CNG Heavy-Duty Vehicles	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML08044	City of Chino	3/19/2009	3/18/2015		\$25,000.00	\$25,000.00	1 CNG Heavy-Duty Vehicle	\$0.00	Yes
ML08046	City of Paramount	2/20/2009	2/19/2015		\$25,000.00	\$25,000.00	1 CNG Heavy-Duty Vehicle	\$0.00	Yes
ML08047	City of Culver City Transportation De	5/12/2009	8/11/2015		\$150,000.00	\$150,000.00	6 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08048	City of Santa Clarita	2/20/2009	6/19/2015		\$25,000.00	\$25,000.00	1 CNG Heavy-Duty Vehicle	\$0.00	Yes
ML08050	City of Laguna Beach Public Works	8/12/2009	4/11/2016	10/11/2016	\$75,000.00	\$75,000.00	3 LPG Trolleys	\$0.00	Yes

**Total: 13**



## 2008-09 AB2766 Local Government Match Program Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
ML09008	City of Culver City Transportation De	1/19/2010	7/18/2016	7/18/2017	\$200,000.00	\$175,000.00	8 Nat. Gas Heavy-Duty Vehicles	\$25,000.00	No
ML09009	City of South Pasadena	11/5/2010	12/4/2016		\$152,000.00	\$0.00	CNG Station Expansion	\$152,000.00	No
ML09010	City of Palm Springs	1/8/2010	2/7/2016		\$25,000.00	\$0.00	1 Nat. Gas Heavy-Duty Vehicle	\$25,000.00	No
ML09013	City of Riverside Public Works	9/10/2010	12/9/2011	12/9/2012	\$144,470.00	\$0.00	Traffic Signal Synchr./Moreno Valley	\$144,470.00	No
ML09014	City of Riverside Public Works	9/10/2010	12/9/2011	12/9/2012	\$113,030.00	\$0.00	Traffic Signal Synchr./Corona	\$113,030.00	No
ML09015	City of Riverside Public Works	9/10/2010	12/9/2011	12/9/2012	\$80,060.00	\$0.00	Traffic Signal Synchr./Co. of Riverside	\$80,060.00	No
ML09023	Los Angeles County Department of	12/10/2010	12/9/2017		\$50,000.00	\$0.00	2 Heavy-Duty Alternative Fuel Transit Vehic	\$50,000.00	No
ML09024	Los Angeles County Department of	10/15/2010	12/14/2012		\$400,000.00	\$0.00	Maintenance Facility Modifications	\$400,000.00	No
ML09025	Los Angeles County Department of	10/15/2010	12/14/2012		\$50,000.00	\$0.00	Remote Vehicle Diagnostics/85 Vehicles	\$50,000.00	No
ML09026	Los Angeles County Department of	10/15/2010	10/14/2017		\$250,000.00	\$0.00	5 Off-Road Vehicle Repowers	\$250,000.00	No
ML09027	Los Angeles County Department of	7/23/2010	3/22/2012	6/22/2012	\$150,000.00	\$0.00	Freeway Detector Map Interface	\$150,000.00	No
ML09030	City of Los Angeles GSD/Fleet Servi	6/18/2010	6/17/2011		\$22,310.00	\$0.00	Remote Vehicle Diagnostics/107 Vehicles	\$22,310.00	No
ML09032	Los Angeles World Airports	4/8/2011	4/7/2018		\$175,000.00	\$0.00	7 Nat. Gas Heavy-Duty Vehicles	\$175,000.00	No
ML09033	City of Beverly Hills	3/4/2011	5/3/2018		\$550,000.00	\$100,000.00	10 Nat. Gas Heavy-Duty Vehicles & CNG St	\$450,000.00	No
ML09035	City of Fullerton	6/17/2010	6/16/2017	12/16/2017	\$450,000.00	\$50,000.00	2 Nat. Gas Heavy-Duty Vehicles & CNG Sta	\$400,000.00	No
ML09036	City of Long Beach Fleet Services B	5/7/2010	5/6/2017	5/6/2018	\$875,000.00	\$450,000.00	Purchase 35 LNG Refuse Trucks	\$425,000.00	No
ML09038	City of Chino	9/27/2010	5/26/2017		\$250,000.00	\$0.00	Upgrade Existing CNG Station	\$250,000.00	No
ML09042	Los Angeles Department of Water a	12/10/2010	12/9/2017		\$1,400,000.00	\$0.00	Purchase 56 Dump Trucks	\$1,400,000.00	No
ML09043	City of Covina	10/8/2010	4/7/2017	4/7/2018	\$179,591.00	\$0.00	Upgrade Existing CNG Station	\$179,591.00	No
<b>Total: 19</b>									
<b>Declined/Cancelled Contracts</b>									
ML09017	County of San Bernardino Public Wo	1/28/2010	7/27/2016		\$200,000.00	\$0.00	8 Nat. Gas Heavy-Duty Vehicles	\$200,000.00	No
ML09018	Los Angeles Department of Water a	7/16/2010	9/15/2012		\$850,000.00	\$0.00	Retrofit 85 Off-Road Vehicles w/DECS	\$850,000.00	No
ML09019	City of San Juan Capistrano Public	12/4/2009	11/3/2010		\$10,125.00	\$0.00	Remote Vehicle Diagnostics/45 Vehicles	\$10,125.00	No
ML09022	Los Angeles County Department of				\$8,250.00	\$0.00	Remote Vehicle Diagnostics/15 Vehicles	\$8,250.00	No
ML09028	Riverside County Waste Manageme				\$140,000.00	\$0.00	Retrofit 7 Off-Road Vehicles w/DECS	\$140,000.00	No
ML09039	City of Inglewood				\$310,000.00	\$0.00	Purchase 12 H.D. CNG Vehicles and Remot	\$310,000.00	No
ML09040	City of Cathedral City				\$83,125.00	\$0.00	Purchase 3 H.D. CNG Vehicles and Remot	\$83,125.00	No
ML09044	City of San Dimas				\$425,000.00	\$0.00	Install CNG Station and Purchase 1 CNG S	\$425,000.00	No
ML09045	City of Orange				\$125,000.00	\$0.00	Purchase 5 CNG Sweepers	\$125,000.00	No
<b>Total: 9</b>									

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Closed Contracts</b>									
ML09007	City of Rancho Cucamonga	2/26/2010	4/25/2012		\$117,500.00	\$62,452.57	Maintenance Facility Modification	\$55,047.43	No
ML09020	County of San Bernardino	8/16/2010	2/15/2012		\$49,770.00	\$49,770.00	Remote Vehicle Diagnostics/252 Vehicles	\$0.00	Yes
ML09021	City of Palm Desert	7/9/2010	3/8/2012		\$39,450.00	\$38,248.87	Traffic Signal Synchr./Rancho Mirage	\$1,201.13	Yes
<b>Total: 3</b>									
<b>Open/Complete Contracts</b>									
ML09011	City of San Bernardino	2/19/2010	5/18/2016		\$250,000.00	\$250,000.00	10 Nat. Gas Heavy-Duty Vehicles	\$0.00	Yes
ML09012	City of Gardena	3/12/2010	11/11/2015		\$25,000.00	\$25,000.00	1 Nat. Gas Heavy-Duty Vehicle	\$0.00	Yes
ML09016	County of San Bernardino Public Wo	1/28/2010	3/27/2014		\$50,000.00	\$50,000.00	Install New CNG Station	\$0.00	Yes
ML09029	City of Whittier	11/6/2009	4/5/2016		\$25,000.00	\$25,000.00	1 Nat. Gas Heavy-Duty Vehicle	\$0.00	Yes
ML09031	City of Los Angeles, Department of	10/29/2010	10/28/2017		\$825,000.00	\$825,000.00	33 Nat. Gas Heavy-Duty Vehicles	\$0.00	Yes
ML09034	City of La Palma	11/25/2009	6/24/2015		\$25,000.00	\$25,000.00	1 LPG Heavy-Duty Vehicle	\$0.00	Yes
ML09037	City of Redondo Beach	6/18/2010	6/17/2016		\$50,000.00	\$50,000.00	Purchase Two CNG Sweepers	\$0.00	Yes
ML09041	City of Los Angeles, Bureau of Sanit	10/1/2010	9/30/2017		\$875,000.00	\$875,000.00	Purchase 35 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML09046	City of Newport Beach	5/20/2010	5/19/2016		\$162,500.00	\$162,500.00	Upgrade Existing CNG Station, Maintenance	\$0.00	Yes
<b>Total: 9</b>									

## 2009-10 AB2766 Contract Status Report

8/8/2012

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
MS10003	City of Sierra Madre	5/11/2012	3/10/2018		\$13,555.00	\$0.00	Purchase 1 H.D. CNG Vehicle	\$13,555.00	No
MS10004	Linde LLC	3/2/2012	6/1/2018		\$56,932.00	\$0.00	Purchase 6 H.D. CNG Vehicles	\$56,932.00	No
MS10005	Domestic Linen Supply Company, In	10/8/2010	7/7/2016		\$47,444.00	\$0.00	Purchase 5 Gas-Electric Hybrid Vehicles	\$47,444.00	No
MS10006	Nationwide Environmental Services	11/19/2010	4/18/2017		\$94,887.00	\$0.00	Purchase Three Street Sweepers	\$94,887.00	No
MS10007	Enterprise Rent-A-Car Company of L	7/15/2011	10/14/2017		\$18,976.00	\$17,078.40	Purchase 2 H.D. CNG Vehicles	\$1,897.60	No
MS10008	Republic Services, Inc.	12/10/2010	5/9/2017		\$123,354.00	\$111,018.60	Purchase 4 CNG Refuse Collection Vehicles	\$12,335.40	No
MS10009	Ware Disposal Company, Inc.	10/29/2010	3/28/2017		\$123,353.00	\$123,352.00	Purchase 4 CNG Refuse Trucks	\$1.00	No
MS10010	New Bern Transport Corporation	10/29/2010	3/28/2017		\$113,864.00	\$102,477.60	Repower 4 Heavy-Duty Vehicles	\$11,386.40	No
MS10011	Foothill Transit Agency	3/9/2012	2/8/2018		\$113,865.00	\$102,478.50	Purchase 12 H.D. CNG Vehicles	\$11,386.50	No
MS10012	Foothill Transit Agency	3/9/2012	3/8/2019		\$85,399.00	\$0.00	Purchase 9 H.D. Electric Vehicles	\$85,399.00	No
MS10016	Rio Hondo Community College	11/5/2010	5/4/2017		\$16,077.00	\$14,469.30	Purchase 1 CNG Shuttle Bus	\$1,607.70	No
MS10017	Ryder System Inc.	12/30/2011	6/29/2018		\$651,377.00	\$0.00	Purchase 60 H.D. CNG and LNG Vehicles	\$651,377.00	No
MS10019	EDCO Disposal Corporation	11/19/2010	2/18/2017		\$379,549.00	\$341,355.43	Purchase 11 H.D. CNG Refuse Trucks	\$38,193.57	No
MS10021	City of Glendora	10/29/2010	11/28/2016		\$9,489.00	\$0.00	Purchase 1 H.D. CNG Vehicle	\$9,489.00	No
MS10024	Frito-Lay North America	7/29/2011	9/28/2017		\$47,444.00	\$42,699.60	Purchase 5 Electric Vehicles	\$4,744.40	No
MS10025	Elham Shirazi	2/18/2011	10/17/2012		\$199,449.00	\$117,908.86	Telework Demonstration Program	\$81,540.14	No
<b>Total: 16</b>									
<b>Pending Execution Contracts</b>									
MS10015	County of Los Angeles Department o				\$37,955.00	\$0.00	Purchase 4 H.D. CNG Vehicles	\$37,955.00	No
<b>Total: 1</b>									
<b>Declined/Cancelled Contracts</b>									
MS10013	City of San Bernardino				\$68,834.00	\$0.00	Purchase 9 H.D. LNG Vehicles	\$68,834.00	No
MS10014	Serv-Well Disposal				\$18,977.00	\$0.00	Purchase 2 H.D. CNG Vehicles	\$18,977.00	No
MS10018	Shaw Transport Inc.				\$81,332.00	\$0.00	Purchase 6 H.D. LNG Vehicles	\$81,332.00	No
MS10022	Los Angeles World Airports				\$123,353.00	\$0.00	Purchase 13 H.D. CNG Vehicles	\$123,353.00	No
MS10023	Dix Leasing				\$105,000.00	\$0.00	Purchase 3 H.D. LNG Vehicles	\$105,000.00	No
<b>Total: 5</b>									
<b>Closed Contracts</b>									
MS10001	Los Angeles County MTA	3/19/2010	2/28/2011	4/28/2011	\$300,000.00	\$196,790.61	Clean Fuel Transit Bus Service to Dodger St	\$103,209.39	No
MS10002	Coachella Valley Association of Gov	6/18/2010	2/17/2011		\$400,000.00	\$400,000.00	Coachella Valley PM10 Reduction Street Sw	\$0.00	Yes
<b>Total: 2</b>									



Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open/Complete Contracts</b>									
MS10020	American Reclamation, Inc.	5/6/2011	2/5/2018		\$18,977.00	\$18,977.00	Purchase 1 H.D. CNG Vehicle	\$0.00	Yes

**Total: 1**

## 2010-11 AB2766 Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
MS11001	Mineral LLC	4/22/2011	4/30/2013		\$94,627.00	\$83,386.83	Design, Develop, Host and Maintain MSRC	\$11,240.17	No
MS11002	A-Z Bus Sales, Inc.	7/15/2011	12/31/2011	12/31/2012	\$1,225,000.00	\$1,000,000.00	Alternative Fuel School Bus Incentive Progr	\$225,000.00	No
MS11003	BusWest	7/26/2011	12/31/2011	12/31/2012	\$540,000.00	\$540,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	No
MS11004	Los Angeles County MTA	9/9/2011	2/29/2012		\$450,000.00	\$174,529.50	Clean Fuel Transit Service to Dodger Stadium	\$275,470.50	No
MS11006	Orange County Transportation Autho	10/7/2011	2/29/2012	8/31/2012	\$268,207.00	\$160,713.00	Metrolink Service to Angel Stadium	\$107,494.00	No
MS11010	Border Valley Trading	8/26/2011	10/25/2017	10/25/2018	\$150,000.00	\$0.00	New LNG Station	\$150,000.00	No
MS11011	EDCO Disposal Corporation	12/30/2011	4/29/2019		\$100,000.00	\$0.00	New CNG Station - Signal Hill	\$100,000.00	No
MS11012	EDCO Disposal Corporation	12/30/2011	4/29/2019		\$100,000.00	\$0.00	New CNG Station - Buena Park	\$100,000.00	No
MS11017	CR&R, Inc.	3/2/2012	2/1/2018		\$100,000.00	\$0.00	Expansion of existing station - Garden Grov	\$100,000.00	No
MS11018	Orange County Transportation Autho	10/14/2011	1/31/2012		\$211,360.00	\$211,360.00	Express Bus Service to Orange County Fair	\$0.00	No
MS11055	KEC Engineering	2/3/2012	8/2/2018		\$250,000.00	\$0.00	Repower 5 H.D. Off-Road Vehicles	\$250,000.00	No
MS11056	The Better World Group	12/30/2011	12/29/2013		\$98,418.00	\$11,552.45	Programmatic Outreach Services	\$86,865.55	No
MS11061	Eastern Municipal Water District	3/29/2012	5/28/2015		\$11,659.00	\$0.00	Retrofit One Off-Road Vehicle under Showc	\$11,659.00	No
MS11067	City of Redlands	5/24/2012	11/23/2018		\$85,000.00	\$0.00	Expansion of Existing CNG Station	\$85,000.00	No
MS11074	SunLine Transit Agency	5/11/2012	7/31/2012		\$41,849.00	\$0.00	Transit Service for Coachella Valley Festival	\$41,849.00	No
MS11076	SA Recycling, LLC	5/24/2012	9/23/2015		\$424,801.00	\$0.00	Retrofit of 13 Off-Road Diesel Vehicles with	\$424,801.00	No
MS11080	Southern California Regional Rail Au	4/6/2012	7/31/2012		\$26,000.00	\$0.00	Metrolink Service to Auto Club Speedway	\$26,000.00	No
<b>Total: 17</b>									
<b>Pending Execution Contracts</b>									
MS11008	USA Waste of California, Inc.				\$125,000.00	\$0.00	Expansion of Existing LCNG Station	\$125,000.00	No
MS11009	Waste Management Collection and				\$125,000.00	\$0.00	Expansion of Existing LCNG Station	\$125,000.00	No
MS11013	Go Natural Gas, Inc.				\$150,000.00	\$0.00	New CNG Station - Huntington Beach	\$150,000.00	No
MS11014	Go Natural Gas, Inc.				\$150,000.00	\$0.00	New CNG Station - Santa Ana	\$150,000.00	No
MS11015	Go Natural Gas, Inc.				\$150,000.00	\$0.00	New CNG Station - Inglewood	\$150,000.00	No
MS11016	CR&R, Inc.				\$150,000.00	\$0.00	New CNG Station - Perris	\$150,000.00	No
MS11019	City of Corona				\$225,000.00	\$0.00	Expansion of Existing CNG Station	\$225,000.00	No
MS11046	Louis Castro				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11047	Ivan Borjas				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11048	Phase II Transportation				\$1,080,000.00	\$0.00	Repower 27 Heavy-Duty Vehicles	\$1,080,000.00	No
MS11049	Ruben Caceras				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11050	Carlos Arrue				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No





## 2010-11 AB2766 Local Government Match Program Contract Status Report

8/8/2012

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
ML11007	Coachella Valley Association of Gov	7/29/2011	7/28/2012		\$250,000.00	\$187,499.97	Regional PM10 Street Sweeping Program	\$62,500.03	No
ML11021	City of Whittier	1/27/2012	9/26/2018		\$210,000.00	\$30,000.00	Purchase 7 Nat. Gas H.D. Vehicles	\$180,000.00	No
ML11022	City of Anaheim	3/16/2012	7/15/2018		\$175,000.00	\$0.00	Install CNG Fueling Station, purchase 5 H.D	\$175,000.00	No
ML11023	City of Rancho Cucamonga	4/20/2012	12/19/2018		\$260,000.00	\$0.00	Expand Existing CNG Station, 2 H.D. Vehicl	\$260,000.00	No
ML11026	City of Redlands	3/2/2012	10/1/2018		\$90,000.00	\$0.00	Purchase 3 Nat. Gas H.D. Vehicles	\$90,000.00	No
ML11027	City of Los Angeles, Dept. of Genera	5/4/2012	7/3/2015		\$300,000.00	\$0.00	Maintenance Facility Modifications	\$300,000.00	No
ML11028	City of Glendale	1/13/2012	5/12/2018		\$300,000.00	\$60,000.00	Purchase 10 H.D. CNG Vehicles	\$240,000.00	No
ML11032	City of Gardena	3/2/2012	9/1/2018		\$102,500.00	\$0.00	Modify Maint. Facility, Expand CNG station,	\$102,500.00	No
ML11033	City of Los Angeles, Bureau of Sanit	3/16/2012	1/15/2019		\$1,080,000.00	\$0.00	Purchase 36 LNG H.D. Vehicles	\$1,080,000.00	No
ML11034	City of Los Angeles, Department of	5/4/2012	1/3/2019		\$630,000.00	\$0.00	Purchase 21 H.D. CNG Vehicles	\$630,000.00	No
ML11036	City of Riverside	1/27/2012	1/26/2019		\$670,000.00	\$0.00	Install New CNG Station, Purchase 9 H.D. N	\$670,000.00	No
ML11038	City of Santa Monica	5/18/2012	7/17/2018		\$400,000.00	\$0.00	Maintenance Facility Modifications	\$400,000.00	No
ML11039	City of Ontario	1/27/2012	9/26/2018		\$180,000.00	\$0.00	Purchase 6 Nat. Gas H.D. Vehicles	\$180,000.00	No
ML11040	City of South Pasadena	5/4/2012	1/3/2019		\$30,000.00	\$0.00	Purchase 1 Nat. Gas H.D. Vehicle	\$30,000.00	No
ML11042	City of Chino	2/17/2012	4/16/2018		\$35,077.00	\$0.00	Purchase 1 Nat. Gas H.D. Vehicle, Repower	\$35,077.00	No
ML11043	City of Hemet Public Works	2/3/2012	2/2/2019		\$60,000.00	\$0.00	Purchase 2 H.D. Nat. Gas Vehicles	\$60,000.00	No
ML11044	City of Ontario	1/27/2012	6/26/2019		\$400,000.00	\$0.00	Expand Existing CNG Station	\$400,000.00	No
ML11045	City of Newport Beach	2/3/2012	8/2/2018		\$30,000.00	\$0.00	Purchase 1 Nat. Gas H.D. Vehicle	\$30,000.00	No
<b>Total: 18</b>									
<b>Pending Execution Contracts</b>									
ML11020	City of Indio				\$30,000.00	\$0.00	Retrofit one H.D. Vehicles w/DECS, repower	\$30,000.00	No
ML11024	County of Los Angeles Department o				\$150,000.00	\$0.00	Purchase 5 Nat. Gas H.D. Vehicles	\$150,000.00	No
ML11025	County of Los Angeles Department o				\$150,000.00	\$0.00	Purchase 5 Nat. Gas H.D. Vehicles	\$150,000.00	No
ML11029	City of Santa Ana				\$265,500.00	\$0.00	Expansion of Existing CNG Station, Install N	\$265,500.00	No
ML11037	City of Anaheim				\$300,000.00	\$0.00	Purchase 12 Nat. Gas H.D. Vehicles	\$300,000.00	No
ML11041	City of Santa Ana				\$265,000.00	\$0.00	Purchase 7 LPG H.D. Vehicles, Retrofit 6 H.	\$265,000.00	No
<b>Total: 6</b>									
<b>Closed Contracts</b>									
ML11035	City of La Quinta	11/18/2011	11/17/2012		\$25,368.00	\$25,368.00	Retrofit 3 On-Road Vehicles w/DECS	\$0.00	Yes
<b>Total: 1</b>									
<b>Open/Complete Contracts</b>									

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML11030	City of Fullerton	2/3/2012	3/2/2018		\$109,200.00	\$109,200.00	Purchase 2 Nat. Gas H.D. Vehicles, Retrofit	\$0.00	No
ML11031	City of Culver City Transportation De	12/2/2011	12/1/2018		\$300,000.00	\$300,000.00	Purchase 10 H.D. Nat. Gas Vehicles	\$0.00	No

**Total: 2**



## 2011-12 AB2766 Contract Status Report

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Open Contracts</b>									
MS12001	Los Angeles County MTA	7/1/2012	4/30/2013		\$300,000.00	\$0.00	Clean Fuel Transit Service to Dodger Stadium	\$300,000.00	No
MS12003	Orange County Transportation Autho	7/20/2012	2/28/2013		\$234,669.00	\$0.00	Implement Metrolink Service to Angel Stadium	\$234,669.00	No
<b>Total: 2</b>									
<b>Pending Execution Contracts</b>									
MS12002	Orange County Transportation Autho				\$342,340.00	\$0.00	Express Bus Service to Orange County Fair	\$342,340.00	No
MS12004	USA Waste of California, Inc.				\$175,000.00	\$0.00	Construct New Limited-Access CNG Station	\$175,000.00	No
MS12005	USA Waste of California, Inc.				\$75,000.00	\$0.00	Vehicle Maintenance Facility Modifications	\$75,000.00	No
MS12006	Waste Management Collection and				\$75,000.00	\$0.00	Vehicle Maintenance Facility Modifications	\$75,000.00	No
MS12007	WestAir Gases & Equipment				\$100,000.00	\$0.00	Construct New Limited-Access CNG Station	\$100,000.00	No
MS12008	Bonita Unified School District				\$175,000.00	\$0.00	Construct New Limited-Access CNG Station	\$175,000.00	No
MS12009	Sysco Food Services of Los Angeles				\$150,000.00	\$0.00	Construct New Public-Access CNG Station	\$150,000.00	No
MS12010	Murrieta Valley Unified School Distric				\$244,000.00	\$0.00	Construct New Limited-Access CNG Station	\$244,000.00	No
MS12011	Southern California Gas Company				\$150,000.00	\$0.00	Construct New Public-Access CNG Station	\$150,000.00	No
MS12012	Rim of the World Unified School Dist				\$75,000.00	\$0.00	Vehicle Maintenance Facility Modifications	\$75,000.00	No
MS12024	Southern California Gas Company				\$150,000.00	\$0.00	Construct New Public-Access CNG Station	\$150,000.00	No
MS12025	Silverado Stages, Inc.				\$150,000.00	\$0.00	Purchase Six Medium-Heavy Duty Vehicles	\$150,000.00	No
MS12026	U-Haul Company of California				\$500,000.00	\$0.00	Purchase 23 Medium-Heavy Duty Vehicles	\$500,000.00	No
MS12027	C.V. Ice Company, Inc.				\$75,000.00	\$0.00	Purchase 3 Medium-Heavy Duty Vehicles	\$75,000.00	No
MS12028	Dy-Dee Service of Pasadena, Inc.				\$45,000.00	\$0.00	Purchase 2 Medium-Duty and 1 Medium-He	\$45,000.00	No
MS12029	Community Action Partnership of Or				\$25,000.00	\$0.00	Purchase 1 Medium-Heavy Duty Vehicle	\$25,000.00	No
MS12030	Complete Landscape Care, Inc.				\$150,000.00	\$0.00	Purchase 6 Medium-Heavy Duty Vehicles	\$150,000.00	No
MS12031	Final Assembly, Inc.				\$100,000.00	\$0.00	Purchase 4 Medium-Heavy Duty Vehicles	\$100,000.00	No
MS12032	Fox Transportation				\$500,000.00	\$0.00	Purchase 20 Medium-Heavy Duty Vehicles	\$500,000.00	No
MS12033	Mike Diamond/Phace Management				\$500,000.00	\$0.00	Purchase 20 Medium-Heavy Duty Vehicles	\$500,000.00	No
MS12034	Ware Disposal Company, Inc.				\$195,000.00	\$0.00	Purchase 2 Medium-Duty and 7 Medium-He	\$195,000.00	No
MS12035	Disneyland Resort				\$25,000.00	\$0.00	Purchase 1 Medium-Heavy Duty Vehicle	\$25,000.00	No
MS12036	Jim & Doug Carter's Automotive/VS				\$50,000.00	\$0.00	Purchase 2 Medium-Heavy Duty Vehicles	\$50,000.00	No
MS12Hom	Mansfield Gas Equipment Systems				\$296,000.00	\$0.00	Home Refueling Apparatus Incentive Progra	\$296,000.00	No
<b>Total: 24</b>									

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 29

REPORT: California Air Resources Board Monthly Meeting

SYNOPSIS: The California Air Resources Board met on August 23, 2012.  
The following is a summary of this meeting.

RECOMMENDED ACTION:  
Receive and file.

Ronald O. Loveridge, Member  
SCAQMD Governing Board

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The Air Resources Board's (ARB or Board) August meeting was held in Sacramento at the California Environmental Protection Agency Building. Key items presented are summarized below.

**1. Public Meeting to Present the Air Resources Board's Role in Responding to Air Emergencies in California**

The Board heard a staff presentation on the purpose, history and capabilities of the emergency air monitoring program. The presentation highlighted how the program supports the State Emergency Plan and the State Emergency Management System.

This was an informational item. No Board action was taken.

**2. Public Hearing to Consider Technical Status of and Proposed Amendments to On-Board Diagnostic System Requirements for Heavy-Duty Engines, Passenger Cars, Light-Duty Trucks, Medium-Duty Vehicles and Engines**

The Board approved amendments to the Heavy-Duty On-Board Diagnostic and Medium-Duty On-Board Diagnostic requirements. The amendments provide revised requirements for diesel engines for 2013 through 2015 to accommodate currently-available technology, and accelerate the start date from 2020 to 2018 for on-board diagnostic system implementation on alternate-fueled heavy-duty engines.

**3. Public Hearing to Consider Amendments to the Verification Procedure, Warranty, and In-Use Compliance Requirements for In-Use Strategies to Control Emissions from Diesel Engines**

The Board approved amendments to the Verification Procedure, which is used to evaluate diesel retrofits through emissions, durability and field testing, and ensure that retrofitted engines are reducing emissions as expected. The changes will reduce the amount of in-use compliance testing required by retrofit manufacturers; improve the process of matching retrofits with their intended vehicles; strengthen the ability of staff to address maintenance and use issues; and provide additional assistance to applicants with the verification process.

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Consent Items

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There were no consent items.

**Attachment**

CARB August 23, 2012 Meeting Agenda



**LOCATION:**



Air Resources Board  
1001 I Street, 2nd Floor  
Byron Sher Auditorium  
Sacramento, California 95814  
<http://www.calepa.ca.gov/EPAbldg/location.htm>

**PUBLIC MEETING  
AGENDA**

**August 23, 2012**

**[Webcast](#)**

This facility is accessible by public transit.  
For transit information, call:  
(916) 321-BUSS, website  
<http://www.sacrt.com/>  
(This facility is accessible to persons with disabilities.)

**TO SUBMIT WRITTEN COMMENTS ON AN  
AGENDA ITEM IN ADVANCE OF THE  
MEETING GO TO:**

<http://www.arb.ca.gov/lispub/comm/bclist/php>

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**August 23, 2012**  
**9:00 a.m.**

**DISCUSSION ITEMS:**

**Note:** The following agenda items may be heard in a different order at the Board meeting.

**Agenda  
Item #**

**Agenda Topic**

12-5-1

**Public Meeting to Present the Air Resources Board's Role in  
Responding to Air Emergencies in California**

*Staff will present to the Board the purpose, history and capabilities of the Air Resources Board's (ARB) emergency air monitoring program. Staff will also explain the importance of this function in the context of the State Emergency Plan and the State Emergency Management System.*

[Staff Presentation](#)

**12-5-2 Public Hearing to Consider Technical Status of and Proposed Amendments to On-Board Diagnostic System Requirements for Heavy-Duty Engines, Passenger Cars, Light-Duty Trucks, Medium-Duty Vehicles and Engines**

*Staff will present to the Board proposed amendments to the Heavy Duty On-Board Diagnostic (HD OBD) and Medium-Duty On-Board Diagnostic (OBD II) requirements. Most of the proposed amendments relate to the requirements for diesel engines, including providing revised requirements during the 2013 through 2015 model years based on the current limits of diesel technology. Staff is also proposing other changes specific to the HD OBD regulation, including accelerating the start date for on-board diagnostic system implementation on heavy-duty alternate-fueled engines from the 2020 model year to the 2018 model year. Staff is proposing to update the associated HD OBD and OBD II enforcement regulations to align with the diesel-related changes being proposed for the HD OBD and OBD II regulations.*

[More Information](#)

[Staff Presentation](#)

**12-5-3 Public Hearing to Consider Amendments to the Verification Procedure, Warranty and In-Use Compliance Requirements for In-Use Strategies to Control Emissions from Diesel Engines**

*Staff will present to the Board proposed amendments to the Verification Procedure, which is used by staff to evaluate diesel retrofits through emissions, durability, and field testing. The Verification Procedure is ARB's key tool for ensuring that diesel retrofits used by fleet owners are an effective means to reducing emissions from existing diesel engines used in vehicles and equipment. Staff's proposed changes are intended to reduce the amount of in-use compliance emissions testing required of retrofit manufacturers while maintaining the protections and remedies for the retrofit system purchasers with the addition of recall provisions. Staff will propose additional changes to improve the process of matching retrofits with their intended vehicles, strengthen ARB's ability to quickly and effectively address systems with high warranty claim rates, provide additional information to fleets on the maintenance and appropriate use of their diesel retrofits, and provide better information to assist applicants in navigating the verification process.*

[More Information](#)

[Staff Presentation](#)

**CLOSED SESSION**

**The Board will 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 or potential litigation, and as authorized by Government Code section 11126(a).:**

*Pacific Merchant Shipping Association v. Goldstene, U.S. District Court (E.D. Cal. Sacramento), Case No. 2:09-CV-01151-MCE-EFB.*

*POET, LLC, et al. v. Goldstene, et al., Superior Court of California (Fresno County), Case No. 09CECG04850; plaintiffs appeal, Court of Appeal No. F064045.*

*Rocky Mountain Farmers Union, et al. v. Goldstene, U.S. District Court (E.D. Cal. Fresno), Case No. 1:09-CV-02234-LJO-DLB; interlocutory appeal, U.S. Court of Appeal, Ninth Circuit Nos. 09-CV-02234 and 10-CV-00163.*

*American Fuels and Petrochemical Manufacturing Associations, et al. v. Goldstene, et al., U.S. District Court (E.D. Cal. Fresno) Case No. 1:10-CV-00163-AWI-GSA; interlocutory appeal, U.S. Court of Appeal, Ninth Circuit Nos. 09-CV-02234 and 10-CV-00163.*

*Association of Irrigated Residents, et al. v. California Air Resources Board, Superior Court of California (San Francisco County), Case No. CPF-09-509562.*

*Association of Irrigated Residents, et al. v. U.S. E.P.A., 2011 WL 310357 (C.A.9), (Feb. 2, 2011).*

*California Dump Truck Owners Association v. California Air Resources Board, U.S. District Court (E.D. Cal. Sacramento) Case No. 2:11-CV-00384-MCE-GGH.*

*Engine Manufacturers Association v. California Air Resources Board, Sacramento Superior Court, Case No. 34-2010-00082774.*

*Citizens Climate Lobby and Our Children's Earth Foundation v. California Air Resources Board, San Francisco Superior Court, Case No. CGC-12-519554.*

*Consideration of a personnel matter.*

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**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 three minutes to ensure that everyone has a chance to speak.

**TO SUBMIT WRITTEN COMMENTS ON AN AGENDA ITEM IN ADVANCE OF THE MEETING GO TO:**

<http://www.arb.ca.gov/lispub/comm/bclist/php>

**ONLINE SIGN-UP:**

You can sign up online in advance to speak at the Board hearing when you submit an electronic Board item comment. For more information go to:

<http://www.arb.ca.gov/board/online-signup.htm>

**IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE CLERK OF THE BOARD:**

1001 I Street, 23rd Floor, Sacramento, CA 95814

(916) 322-5594

ARB Homepage: <http://www.arb.ca.gov>

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**To request a special accommodation or language needs for any of the following:**

- An interpreter to be available at the hearing.
- Have documents available in an alternate format or another language.
- A disability-related reasonable accommodation.

Please contact the Clerk of the Board at (916) 322-5594 or by facsimile at (916) 322-3928 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.

**Para solicitar alguna comodidad especial o necesidad de otro idioma para alguna de las siguientes:**

- Un intérprete que esté disponible en la audiencia
- Tener documentos disponibles en un formato alterno u otro idioma.
- Una acomodación razonable relacionados con una incapacidad.

Por favor llame a la oficina del Secretario del Consejo de Recursos Atmosféricos al (916) 322-5594 o envíe un fax al (916) 322-3928 no menos de 7 días laborales antes del día programado para la audiencia. Para el Servicio Telefónico de California para Personas con Problemas Auditivos, ó de teléfonos TDD pueden marcar al 711.

**SMOKING IS NOT PERMITTED AT MEETINGS OF THE CALIFORNIA AIR  
RESOURCES BOARD**

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[↑ Back to Agenda](#)

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 30

PROPOSAL: California Fuel Cell Partnership Steering Team Meeting Summary and Quarterly Update 

SYNOPSIS: This report summarizes the California Fuel Cell Partnership Steering Team meeting held during June 12-13, 2012 and provides quarterly update for the period beginning January 2012.

COMMITTEE: Technology, July 27, 2012, Reviewed

**RECOMMENDED ACTIONS:**

Receive and file the attached Steering Team meeting summary and quarterly update.

Matt Miyasato, Ph.D.  
Assistant Deputy Executive Officer  
*(attended and summarized)* for  
Josie Gonzales  
AQMD Representative to CaFCP

# CALIFORNIA FUEL CELL PARTNERSHIP

Summary of Steering Team Meeting  
June 12-13, 2012

South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Steering Team  
Representatives Attending:

Andreas Truckenbrodt, AFCC, member  
Tom Cackette, CARB, member  
Catherine Dunwoody, Chris White, Bill Elrick, CAFC  
Carla Peterman (phone), CEC, member  
Reg Modlin, Chrysler, member  
Christian Mohrdieck, Daimler, member  
Alex Keros, General Motors, representative  
Kiho Yoo, Hyundai, representative  
Robert Bienenfeld, Honda R&D America, member  
Lance Atkins, Nissan Motor, representative  
Matt Miyasato, SCAQMD, representative  
Justin Ward, Toyota, member  
Fred Joseck, U.S.DOE, representative  
(absent), U.S. DOT  
(absent), U.S. EPA, Region 9  
Joerg Launer, Volkswagen, member

## *SUMMARY OF AGENDA ITEMS*

- Justin Ward (Toyota) served as Chair and provided welcome and closing remarks.
- Tom Cackette (CARB) gave an update on CARB activities, the status of the Governor's ZEV Executive Order, and the status of Clean Fuels Outlet (CFO) and Zero Emission Bus (ZEB) regulations. The state is directed to facilitate ZEV commercialization by having adequate infrastructure (including 68 hydrogen stations), increased ZEV component manufacturing, and an increase in ZEV-related graduate degrees and research programs by 2015, infrastructure for 1 million vehicles by 2020, 1.5 million EV's on the road by 2025, and an 80% reduction in GHG's by 2050. Ten percent of state fleet purchases will be ZEV's, and CaFCP and the California Plug-In Electric Vehicle Collaborative (PEVC) are directed to develop benchmarks. California will continue funds to build the hydrogen network, and will continue efforts to increase signage, develop

measurement of hydrogen as fuel, streamline permitting and co-location, increase community readiness, and promote hydrogen as business opportunities.

- CARB will enact the CFO regulation to ensure fuel is available where and when it is needed 18 months after the first notice that 20,000 vehicles are in operation statewide, or 10,000 regionally. The final Statement of Reason (FSOR) will be submitted to the California Office of Administrative Law by the end of summer. The Clean Vehicle Rebate Program (CVRP) will provide rebates of \$900-\$2,500 using \$4.5 million from the 2011-2012 CARB AB 118 budget, with the potential of increasing to \$13-17 million in 2012-2013. The Zero Emission Bus regulation will be reviewed by CARB in early 2013 with workshops in late summer.
- Carla Peterman (CEC) described current CEC hydrogen activities. The CEC 2011 benefits report states that there are a total of \$22.7 million in hydrogen development funds, including \$17 million that are unencumbered. The first hydrogen station Notice of Proposed Award (NOPA) of 2010 funded 11 stations. The Department of Food and Agriculture will be developing testing and analysis for hydrogen fuel quality and metering. CEC also supports the STREET model of expanding alternative fuel placement and upstream and downstream emissions. CEC recently cancelled a hydrogen solicitation in order to revamp protocols. CEC will issue a new hydrogen solicitation (still with \$18.7 million committed) so that there will be a wider range of applicants, prioritizing of strategic locations, more transparency through holding at least two workshops, considering implementing the STREET model (with input from OEM's and station operators), and plans to issue a NOPA by the end of this year.
- Alex Keros (GM) who presented an overview of the Road Map during the previous Steering Team meeting, provided an update. For the 68 hydrogen stations recommended by the Roadmap, about \$65 million in co-funding will be needed to build 37 additional stations and provide support until these and existing stations can become profitable due to growing vehicle deployment. The CaFCP Roadmap was approved with proposed edits for public use starting at the Fuel Cell Summit conference in Washington, DC.
- Chris White (CaFCP) described the status on the development of the business of selling hydrogen. The group Fueling the Future has restarted discussions, and CaFCP members discussed the fuel marketer model in which they own land and buy or blend wholesale fuel to sell to station operators. There was also discussion on using Oil Price Information Service (OPIS) for transparency in pricing and the use of convenience stores versus card locks for unattended fueling stations. Fred Joseck (U.S. DOE) suggested getting fuel marketers to communicate with material handling operators since they are asking the same questions.
- Tyson Eckerle (EIN) discussed feedback from fuel marketers. Fuel marketers do not believe a CFO regulation will occur, and instead, they prefer a self-sustaining mechanism to assure the future of the product, such as a per-kilogram tax on hydrogen. Catherine Dunwoody (CaFCP) presented a different funding model based on the Propel CEC, DOE ARRA award for E85 with the California



Department of General Services (DGS) as the fiscal agent. This new model would combine funding from different government agencies but use a single fiscal agent, possibly local air districts. The timeframe for implementation is about 6 months, and the most time-consuming parts of the plan would be aggregating funding and establishing the cash flow mechanism.

- Air Products and Chemicals, Inc. takes 4-5 months to build hydrogen stations for material handling equipment like forklifts. Tom Cackette suggested doing a case study and examining the lessons learned.
- Tom Cackette stated that the San Francisco airport hydrogen station is not going to be built. Also, Sandia is doing the safety review for the recent Emeryville hydrogen station incident, and preliminary results show that it was likely due to a material incompatibility in a pressure relief valve.
- Fred Joseck (U.S. DOE) stated that the DOE budget from the House and Senate are both more than the President's request. Secretary Chu met with automakers at the 2012 Detroit Auto Show and also participated in a recent Hydrogen Technical Advisory Committee sub-group meeting.
- Jeff Reed presented for Southern California Gas and stated that \$10 million is authorized for natural gas technology research and development. They have invested in fuel cells including a small equity holding in ClearEdge Power, and used to have an investment in Plug Power.
- Chris White (CaFCP) described current outreach efforts, including an email list of 55,000 in which 40% of recipients click through all the website links to get more information.
- Robert Bienenfeld (Honda) gave an update on the potential for a Hydrogen Infrastructure Trust (HIT). Hydrogen stations need to be funded and built early enough to launch the fuel cell vehicle market since automakers typically make production decisions 24 months prior to commercialization, which means that the MY2015 production decision is made in September 2012. Furthermore, development, engineering and manufacturing decisions occur 3 years prior to that decision.
- Bill Elrick and Jordan McRobie (CaFCP) described what has been learned about station implementation and the problems that are yet to be overcome. In addition, McRobie described what CaFCP can do to begin implementation and how to turn problems into opportunities. Elrick identified new areas that CaFCP can assist with and proposed next steps. Five key priorities were identified for further investigation: 1) Gantt chart identifying steps from funding to implementation, 2) Process for validating H2 station locations, 3) Fueling station agreements, 4) Station performance and 5) Metering and a clear path forward for charging for fuel. Discussion ensued regarding GANTT chart and a typical station's progress from PON to implementation, and the time needed to complete each step of that process. If 2016 goal is 68 stations, and we know the average time to complete a station is 2.5 years, we have to back cast from end goal to

determine if we are ahead or behind schedule. CaFCP staff with ST member lead will conduct this analysis and report results back to October ST.

- Justin Ward indicated that automakers support using UC Irvine's STREET model to evaluate station locations within clusters.
- The prospective associate members So Cal Gas, Cal State Los Angeles, and Hydrogenics were approved.
- CaFCP members reviewed and approved the February 2012 Steering Team decisions and assignments. Staff gave updates on the 2012 Health Chart and the 4+8 Budget, and the status of member signatures to the CaFCP 2013-2016 Statement of Intent (SOI).

The next CaFCP Steering Team meeting is scheduled for October 9-10, 2012 in Sacramento.

Additional information about the California Fuel Cell Partnership can be found at <http://www.fuelcellpartnership.org>

#### **Attachments**

CaFCP Quarterly Activity Report: January – March 2012

CaFCP Quarterly Activity Report: April – June 2012

## CaFCP Quarterly Update January-March 2012

### Background

The California Fuel Cell Partnership is a unique collaborative of auto manufacturers, energy companies, fuel cell technology companies, and government agencies, including SCAQMD. This report summarizes CaFCP activity in or related to Southern California, for April - June 2011.

Between 2008 and 2012, CaFCP's focus is on building the foundations for the commercialization of hydrogen fuel cell vehicles, to meet the following goals:

1. Establish and maintain a common vision for the market transition in California
2. Identify hydrogen fuel needs by year and location
3. Provide a forum to match fueling station partners
4. Facilitate an ongoing dialogue to determine future hydrogen fueling stations
5. Maintain an accurate database of existing and planned stations in California
6. Prepare communities in California by educating local officials, including fire professionals, about hydrogen and fuel cell vehicles

The following activities are examples of CaFCP's work toward achieving these goals.

### Public Events and Conferences

<p><b>“Leaping to Cleaner Trucks &amp; Cleaner Air”</b>– workshop organized by US EPA, CARB, CEC, SCAQMD, and San Joaquin Valley Air Pollution Control District on February 29, 2012 in Bakersfield, CA</p>	<p>At the request of US EPA, CaFCP staff attended this workshop and provided input on how fuel cell buses as a medium/heavy duty vehicle application could contribute to achieving emission reduction goals in SJVAPCD and SCAQMD districts. Lessons learned from hydrogen station implementation were shared, and appeared similar and helpful to the implementation of PHEV charging infrastructure.</p>
<p><b>“Advanced Transportation Market Opportunities in China Seminar”</b> – organized by the US Department of Commerce on March 29, 2012 at the Craneway Pavilion in Richmond, CA</p>	<p>At the request of the US DoC invitation, CaFCP presented California as one of the first FCV markets, developing in parallel to Japan and Germany, with China being a large potential future FCEV market. Several contacts were made with national and regional governmental &amp; industry groups in response to requests for more information about FCEVs and hydrogen infrastructure.</p>

<p>League of California Cities- Mini Expo – March 20th</p>	<p>The CaFCP exhibited at the 2012 League of California Cities Mini Expo at the Fairmont Hotel in San Jose, CA. The mini expo reaches out to all Public Works professionals and Planning Commissioners/Directors from all over California. CaFCP staff spoke with several city officials from Burbank, Laguna Niguel, Corona, Oakland, Richmond, Sacramento and many more. Overall CaFCP staff spoke with 20+ city officials. CaFCP will be exhibiting at the Annual League of Ca. Cities Expo on Sept. 5-9 in San Diego, CA.</p>
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**Other events:**



**Emergency Responder Training**

Emergency responder training and fire community outreach are important aspects of the goal to support member fleets and stations. Scheduled upcoming events:

- Corona Auto-X, Corona, CA April 13<sup>th</sup>
- Sacramento Metro FD, Sacramento, CA June 25-29

Date	Southern California Training	Northern California Training	Out of State	Total
<b>Q1 2012</b>	<b>465</b>	<b>28</b>		<b>493</b>
Q4 2011	211	91	6	308
Q3 2011	30	15	5	50
Q2 2011	224	36	11	271
Q1 2011	298			298

<p><b>ER Workshop, Ceres FD, Tuesday Jan 9<sup>th</sup> -11<sup>th</sup> (28)</b></p>	<p><i>Did ER workshop for Ceres, Patterson, Modesto, and Stanislaus Consolidated Fire Departments for the Winco hydrogen station in Ceres.</i></p>
<p><b>US DOE ER Training with LA City Fire, Jan 24<sup>th</sup>-26<sup>th</sup> (125)</b></p>	<p><i>Worked with Dave Randolph, a contact from past ER Training event (June, 2011)</i></p>

<p><b>Firehouse World, San Diego, Feb 20<sup>th</sup> - 23<sup>rd</sup> (150)</b> <i>Fifth year at this event- very important to maintain presence-establish contacts, maintain existing ones, many recognized us this year from previous years at FHW, previous ER workshops (both CaFCP and DOE).</i></p>	
<p><b>DOE ER Training with LA County Fire, March 5<sup>th</sup>, 6<sup>th</sup>, and 8<sup>th</sup> (170)</b></p>	
<p><b>Rio Hondo College, Train the Trainer (Clean Cities Alt Fuel course), March 22<sup>nd</sup>, 23<sup>rd</sup> (20)</b></p>	<p><i>Supported John Frala, of Rio Hondo College, with Daimler FCV for display and rides. Jennifer offered updated hydrogen, fc, and station information to the in class portion.</i></p>

### Technical Program Updates

CaFCP has several technical programs with teams that meet regularly to work on interoperability issues, such as hydrogen quality, fueling systems, station testing, and public access. This work helps achieve the goal of enabling a California fueling infrastructure.

#### ***CaFCP Bus Team***

The Bus Team worked on supporting SFO with their application to receive CEC funding for the purchase and operation of a fuel cell bus to transport travelers between terminals and parking. The next in-person Bus Team meeting is expected to occur either late April or late May.

### ***Infrastructure Development***

#### **Partnering**

On March 5<sup>th</sup>, CaFCP staff met with Torrance based US Hybrid to share information. US Hybrid is a private company that specializes in military grade transportation applications for DOD. They are currently working on projects for Hawaii and California which could require the development of hydrogen infrastructure. CaFCP could initially support with ER/Fire training resources and would benefit from the development of contacts in DOD to further support and educate government on need for more hydrogen infrastructure.

#### **Education**

CaFCP staff continues to support the CHBC (California Hydrogen Business Council) and UC Irvine led educational tours of Orange County Sanitation District's Tri-generation renewable hydrogen fueling station in Fountain Valley, CA (off I-405 at the Euclid Street exit). The most recent February 14<sup>th</sup> tour was open to the public and limited attendee spots filled up extremely quickly, as tours of this facility continue to be very popular. This renewable hydrogen station was co-funded by South Coast AQMD and others and is a testament to the potential of stationary fuel cell technology to reduce air pollution while providing clean renewable hydrogen fuel for vehicles (while also producing high quality waste heat and electricity). This is all courtesy of the conversion of 'renewable' biogas, which is continuously produced by anaerobic digestion of human waste at treatment facilities.

#### **Community Development**

In mid March, CaFCP staff met with several City planning departments in Orange County in support of infrastructure providers' CEC PON response, due March 22nd. Basic hydrogen education was provided to facilitate early discussion on potential projects as well as to open dialogue regarding each jurisdiction's CEQA requirements. CEQA represents a major hurdle in current funding opportunities as State of CA cannot award funds without CEQA determination and project developers are not willing to bear risk and cost of establishing CEQA determination with local jurisdiction without knowing whether they will be awarded grant for project by CEC.

#### **Hydrogen Vehicle Authorization System (HVAS)**

The HVAS team was formed to identify the communication technology (or technologies); to specify what information would be transmitted; and to determine the scope and purpose of the system to identify a hydrogen vehicle as authorized to fuel at a station. The HVAS pilot demonstration team has initiated a project to work with WEH and Thinkify to develop a fully optimized antenna design for the next phase of the HVAS demonstration. All resources related to the HVAS project are posted at <http://cafcpmembers.org/membersonly/technical-programs/hvas>.

### ***Hydrogen Quality***

**MBS:** The MBS project is considered tabled for the current quarter. The composition has been identified, and no additional steps are currently required.

**HQSA:** DMS is working to adopt SAE J2719 as the hydrogen fuel quality standard for the state. CaFCP supported update of hydrogen quality in NIST handbooks to be presented at July NCWM.

### ***Codes and Standards***

## California Fuel Cell Partnership

CaFCP staff support efforts for multiple codes and standards, including: ASTM, ASME, CSA, DMS, ISO, NIST, and SAE. The staff provides liaison reports to the standard development organizations, ensuring collaboration with, and feedback to, members.

**ASTM:** The FTIR method D7653 is concluding the round robin evaluation. D7675 has gone to concurrent ballot for update, and D7650 is being edited to include 70MPa Particulate sampling device. Two more ballot items are anticipated by the end of the year, and the Inter Laboratory Study of the GCMS method D7649 is being initiated.

**NIST:** The hydrogen fuel quality specification has been updated to reference SAE J2719 with the support of the USNWG and CaFCP and will be voted on at the July NCWM.

**SAE:** J2601 is on an accelerated timeline to be published as a standard by EOY 2012. The subcommittee for SAE J2601/2 “Heavy duty gaseous hydrogen vehicle fueling standard”, is meeting monthly and presented its progress to the in-person J2601 committee meeting on March 13. HVAS may be included in J2601 if the demonstration project is completed in time.

### Media Outreach, Legislative Outreach, Website Activity and Materials

Outreach activities show how CaFCP works toward the goal of being a leading source of information. The media and outreach position was relocated to Southern California, providing greater outreach potential for the region.

#### CaFCP 2.0

In 2011, CaFCP continued to engage audiences through social media campaigns, actively utilizing new media tools in blogs (web logs), Facebook, Twitter, CaFCP’s public website and monthly subscriber newsletter

www.cafcp.org	Jan-12	Feb-12	Mar-12
<b>Number of visits</b>	28,323	32,959	26,226
<b>Average time spent on site</b>	2:07	2:23	2:03
<b>Most visited pages</b>	Home page Station map FAQ Vehicle progress Station progress	Home page Station map FAQ Vehicle progress About Members	Home page Station map FAQ Station progress About Members
<b>Most searched keywords on Google to land on CaFCP website</b>	where does hydrogen come from california fuel cell partnership cafcp difference between fuel cell and battery where did hydrogen come from	where does hydrogen come from california fuel cell partnership cafcp difference between fuel cell and battery difference between battery and fuel cell	where does hydrogen come from california fuel cell partnership cafcp difference between fuel cell and battery plan of fuel stations
<b>Most searched keywords on cafcp.org search engine</b>	careers cost dot MIT request a visit	cost of hydrogen CaFCP WG Meetings hydrogen fuel cell jobs station map	funding dunwoody fire station status where does hydrogen come

## California Fuel Cell Partnership

			from
<b>Most referred websites</b>	google.com hydrogenhighway.ca.gov bing.com yahoo.com en.wikipedia.org	google.com yahoo.com hydrogenhighway.ca.gov bing.com en.wikipedia.org	google.com hydrogenhighway.ca.gov yahoo.com bing.com en.wikipedia.org

### Facebook

Facebook is a social media network we have been using to post videos, articles, information, and to allow those with an interest in hydrogen and fuel cells to learn and connect.

The Facebook page can be a useful tool to gain awareness and promote upcoming CaFCP events. The first test was promoting the 2009 Santa Monica Alt Fuels. A number of conference attendees heard about the event through our Facebook page. The immediate goal is to increase page traffic and interaction. The longer-term goal is for fans to use it to share information and links with each other.

<b>FACEBOOK</b>	Jan-12	Feb-12	Mar-12
<b>New likes</b>	36	26	20
<b>Lifetime likes</b>	1,874	1,886	1,888
<b>Post Views*</b>	11,065	3,187	4,924
<b>Page Posts*</b>	Happy new year! We're back... (957) Today we're talking about... (833) Exciting for the UK! (829) On a personal note.... (782)	Larry Burns at ARPA-E conference... (420) The ASTM magazine has a nice... (329) We've been out all week... (252) Just back from hearing Amory... (242)	It's a beautiful day in sunny Cali... (455) Mercedes invisible car... (432) Early morning visitor at the... (428) Had lunch on Saturday with... (415)

### Twitter

Twitter is one of the fastest growing social media tools today. CaFCP created its Twitter account on February 2, 2009 as part of a “listening” phase. After developing the Communications Team Social Media Strategy plan, it was found that Twitter would be a tool used for communicating in real time. CaFCP’s tweets are focused on factual information about CaFCP member activity and technology.

<b>TWITTER</b>	Jan-12	Feb-12	Mar-12
<b>Followers</b>	514	527	544
<b>Tweets</b>	3104	3212	3306

### Legislative and Environmental Outreach

<b>MEETING</b>	<b>DATE</b>	<b>MET WITH</b>
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<p>Dorothy Korber - Senate's Office of Oversight and Outcomes</p>	<p>01/06/2012</p>	<p>Catherine, met with Dorothy Korber regarding the report she is writing for the California State Legislature. It is primarily focused on how California can support fuel cell manufacturers in the state to encourage green job growth. CD, directed her to sources more familiar with these companies, but also mentioned that CaFCP members may be able to share some information about California supply chain that supports fuel cell vehicle and hydrogen station products. She would like to know which California-based companies are working in this space and better understand what the State can do to support them.</p> <p>This request once again highlights the importance of jobs, jobs, jobs in gaining support for our initiatives. If any of you can share information directly with Dorothy, please take this opportunity to do so. If you have ideas about how we can coordinate as CaFCP without exposing competitive information, please let me know.</p>
<p>State Capitol Legislative Outreach Event</p>	<p>01/18/2012</p>	<p>Senator Fran Pavley and Senator Desaulnier noticed the display of FCV's</p> <ul style="list-style-type: none"> <li>• Catherine and Chris met and spoke with Florentino Castellon, Deputy Director for Permit Assistance from Governor Brown's office. He offered any assistance needed for permitting H2 stations. CaFCP will follow up.</li> <li>• CaFCP's Legislative Outreach was announced in the Capitol Morning Report</li> <li>• Spoke to 20-25 folks through out the day including (Lobbyist from Rose&amp;Kindel, CPA's, Attorneys and Tourist)</li> </ul>

<p>Meeting with Senator DeLeon's Staffer, Alfredo Medina</p>	<p>02/22/2012</p>	<p>Catherine Dunwoody and CaFCP members met with DeLeon's Legislative Consultant, Alfredo Medina. Topics covered included progress and plans for H2 and FCVs in CA, environmental benefits, infrastructure challenges. DeLeon is very supportive because he has lots of freeways through his district. He is particularly interested in the air quality impacts and appreciates the zero emissions of FCVs. He offered his support in any way he can help.</p>

**Upcoming CaFCP Activities for Q2, 2012**

- April 21,22: Earth Day Festival (Santa Barbara)
- May 6-9: EVS 26 (LA), May 14-17 ACT Expo(Long Beach)
- June 12-13: CaFCP Steering Team (Diamond Bar)

## CaFCP Quarterly Update April-June 2012

### Background

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The following activities are examples of CaFCP's work toward achieving these goals.

### Roadmap project

This project team, with feedback and approval from all the CaFCP members developed a strategy document for California named "*A California Road Map: The Commercialization of Hydrogen Fuel Cell Vehicles*". This document gives an overview of the targets, path and needed resources to facilitate the start of the early commercial market for fuel cell electric vehicles. Key points:

- An initial operational network of 68 strategically placed stations by the end of 2015 is required to provide sufficient coverage for the successful early-commercial rollout of FCEVs in California
- Five cluster areas: Berkeley, San Francisco South Bay Area, Santa Monica and West LA, coastal Southern Orange County; and Torrance with nearby coastal cities.
- 37 stations are assumed to be fully funded, and an additional 31 stations need to be funded to reach the 2015 goal
- It will take an additional \$65 million to cover the cost of 31 additional stations and support operation and maintenance costs for the 37 stations that have been or are expected to be funded with currently committed resources.

This document is available at <http://www.caFCP.org/resources/print-materials>.

### Public Events and Conferences

#### 2012 Santa Barbara Green Car Show

Santa Barbara, CA

The California Fuel Cell Partnership, Energy Independence Now and the California Hydrogen Business Council are co-exhibiting at the 13th Annual Santa Barbara Green Car Show. The group reached out to 300 folks during the two-day event. It was a great success.



**2012 EVS/EDTA Expo**

Los Angeles Convention Center

The 26th Electric Vehicle Symposium was held at the Los Angeles Convention Center. Jennifer Hamilton presented on Hydrogen and Fuel Cell Education for Emergency Responders and Permitting Officials: Going Global. CaFCP along with its members exhibited on the showroom and Ride&Drive participation. CaFCP reached out to more than 100 people.



**Antelope Valley Clean Cities Green Energy and Vehicle Expo.** AV Fairgrounds, Lancaster, CA. This was a great way to support the AV and leverage SCAQMD/CaFCP FCV efforts to help other Clean Cities coordinators' activities in reducing pollution and petroleum consumption from passenger vehicles. CaFCP reached out to more than 100 people.



**American Lung Association, Los Angeles, CA.** CaFCP's 5th Annual participation at the ALA Fight For Air Climb. It is important to continue to increase overall public awareness and support for zero-emission hydrogen and fuel cells. Our ad was exposed to more than 200 people.

<http://www.lung.org/pledge-events/ca/los-angeles-climb-fy12/>

**Clean Air Quality Awards Reception:**

Los Angeles, CA

Guests included former Assembly Member and current CA Transportation Commissioner Dario Frommer, former Assembly Member and current Air Resources Board member Hector De La Torre, City Council Member Paul Koretz, Assembly Member Betsy Butler, State Senator Kevin DeLeon, Los Angeles City Controller (and mayoral hopeful) Wendy Greuel and Los Angeles Mayor Antonio Villaraigosa. Sponsors included Southern California Gas, Daimler Trucks North America, the Los Angeles Department of Water and Power, the Port of Los Angeles and others. Also attending was Thomas Wong, chair of the Monterey Park Environmental Commission (and guest of CaFCP).



**Helping build a sustainable future for all Californians.**

For more information about hydrogen fuel cell vehicles and the work of the California Fuel Cell Partnership, please visit us at [www.ca4cp.org](http://www.ca4cp.org)

The California Fuel Cell Partnership is a collaboration of auto manufacturers, energy providers, government agencies and fuel cell technology companies that work together to commercialize fuel cell vehicles and hydrogen stations. Fuel cell vehicles have the performance and feel of an electric vehicle with the range and comfort of a conventional vehicle.

3300 Industrial Blvd, Suite 1000 | West Sacramento, CA 95691 | 916.371.2870 | info@ca4cp.org

**Upcoming Events for Q3**

- California League of Cities Conference and Expo, Sept. 5-7, San Diego, CA
- Clean Tech OC, Sept. 18<sup>th</sup>, Irvine, CA
- Santa Monica Alt Car Expo, Sept. 28-29, Santa Monica, CA

### Emergency Responder Training

Emergency responder training and fire community outreach are important aspects of the goal to support member fleets and stations.

Jennifer Hamilton, Jordan McRobie, Keith Malone along with Carl Rivkin of NREL met with the City of Santa Monica Planning, Engineering, Building and Safety, Fire Marshal and Fire Inspector on June 19<sup>th</sup> to educate them with respect to hydrogen, safety, fueling station technology and answer any questions, address concerns they had around infrastructure and permitting/codes and standards.

Scheduled upcoming events:

- Nor Cal Fire Prevention Officers, Palo Alto, CA July 11<sup>th</sup>
- Sacramento Metro FD, Sacramento, CA, moved to week of July 23<sup>rd</sup>
- Beverly Hills FD, Beverly Hills, CA September 10<sup>th</sup>, 11<sup>th</sup>, and 13<sup>th</sup>



This was the 6<sup>th</sup> consecutive year for the CaFCP to participate in the Corona Auto-X extrication event hosted by Corona Fire Department. As in previous years, CaFCP OEM members support with vehicles for static display and Jennifer Hamilton presents the class. In the recent past, the OEM members have also brought other vehicle technologies, such as NGV and gas-electric hybrids, to support the broadening array of vehicles covered in the classroom portion by the instructors. While these vehicle technologies might be more prevalent than FCVs, there are still some participants from parts of the county where alternative fueled vehicles are not common, so this is their opportunity to learn about and see the all of the vehicles up close. The CaFCP appreciates being able to participate and will continue to support as long the invitation is open.

	Southern California Training	Northern California Training	Out of State	Total
<b>Q2 2012</b>	<b>113</b>	<b>16</b>	<b>12</b>	<b>141</b>
Q1 2012	465	28		493
Q4 2011	211	91	6	308
Q3 2011	30	15	5	50
Q2 2011	224	36	11	271

### Technical Program Updates

CaFCP has several technical projects with teams that meet regularly to work on interoperability issues, such as hydrogen quality, fueling systems, station implementation and testing, and public access. This work helps achieve the goal of enabling a California fueling infrastructure.

**CaFCP Bus Team**

The Bus Team met on June 13 at SCAQMD. During this meeting, Ballard gave an update on the expected pricing of fuel cell buses up to 2015 and beyond, based on 100 or more FCBs purchased. In addition to an update on the California ZBus Regulations, updates were provided on the SAE J2601-2 Bus Fueling Guideline activities, NREL's FCB data analysis and CaFCP revised membership structure. For FCB interested parties, the Center for Transportation and Environment, under contract with DOT FTA, developed a new website with information about all FCB programs in the US, at: [www.gofuelcellbus.com](http://www.gofuelcellbus.com). The next in-person Bus Team meeting is scheduled for late September.

**Infrastructure Development****Partnering**

In early May, CaFCP staff supported infrastructure providers (aka station builders) initial meetings with local building officials in Lake Forest and Huntington Beach, to discuss project applications and CEQA determination. CaFCP staff provided high level education on vehicle safety, infrastructure roll out scenarios, and other general topics of interest.

**Education**

During the week of May 6-9 CaFCP staff supported a booth at EVS 26<sup>th</sup> to help educate EV advocates and the public about hydrogen stations and fuel cell vehicles (FCV's). Bill Elrick chaired the "fuel cell vehicle and onboard hydrogen" breakout session at the conference. CaFCP members also had FCVs in the public ride and drive so individuals continue to have a chance to compare how different types of EVs perform in real driving conditions.

On June 7<sup>th</sup>, CaFCP staff met with the Clean Cities Coordinators from SCAG to update them on the latest developments within the hydrogen and fuel cell industry. The discussion included the latest CaFCP Roadmap data showing the minimum infrastructure required to launch commercial fuel cell vehicles in California. The meeting was also used to discuss future alternative fuel collaborations and how to leverage each other's expertise. This was an important first step to move in a direction of advancing hydrogen fuel cell vehicles exposure within the national Clean Cities programs while also supporting SCAG's broader transportation and environment objectives.

**Community Development**

At the end of May, CaFCP hosted the second Fueling the Future workgroup with 12 companies in the gas station industry. We visited the Torrance and Harbor City hydrogen stations, and then conducted a facilitated discussion to understand their questions, concerns and attraction to adding hydrogen to an existing gas station. Later in the day, we led them through a cash flow model developed to spur investment in hydrogen stations to get their feedback. Results of the session were presented at the June CaFCP Steering Team meeting and will form the basis for upcoming CaFCP projects.

**Hydrogen Vehicle Authorization System (HVAS)**

The HVAS pilot demonstration team initiated a project to work with WEH and Thinkify to develop a fully optimized antenna design and robust housing for the next phase of the HVAS demonstration. All resources related to the HVAS project are posted at <http://cafcpmembers.org/membersonly/technical-programs/hvas>.

**Hydrogen Quality**

**HQSA:** DMS is working to adopt SAE J2719 as the hydrogen fuel quality standard for the state. CaFCP supported update of hydrogen quality in NIST handbooks to be presented at July NCWM.

### **Codes and Standards**

CaFCP staff support efforts for multiple codes and standards, including: ASTM, ASME, CSA, DMS, ISO, NIST, and SAE. The staff provides liaison reports to the standard development organizations, ensuring collaboration with, and feedback to, members.

**ASTM:** The FTIR method D7653 is concluding the round robin evaluation. D7675 has gone to concurrent ballot for update, and D7650 is being edited to include 70MPa Particulate sampling device. Two more ballot items are anticipated by the end of the year, and the Inter Laboratory Study of the GCMS method D7649 is being initiated.

See the attached document: **ASTM D03.14 Hydrogen and Fuel Cells Update**

**NIST:** The hydrogen fuel quality specification has been updated to reference SAE J2719 with the support of the USNWG and CaFCP and will be voted on at the July NCWM.

**SAE:** Alternative fueling methods considered for addition to J2601; decision date for inclusion of July 31<sup>st</sup>. J2601 is on an accelerated timeline to be published as a standard by EOY 2012. The subcommittee for SAE J2601/2 “Heavy duty gaseous hydrogen vehicle fueling standard”, is meeting monthly and presented its progress to the in-person J2601 committee meeting June 12th.

**CSA:** CaFCP to host a half-day informational workshop on CSA HGV 4.3 for station performance on July 19<sup>th</sup>.

### **Media Outreach, Legislative Outreach, Website Activity and Materials**

Outreach activities show how CaFCP works toward the goal of being a leading source of information. The media and outreach position was relocated to Southern California, providing greater outreach potential for the region.

#### **CaFCP online outreach**

In 2011, CaFCP continued to engage audiences through social media campaigns, actively utilizing new media tools in blogs (web logs), Facebook, Twitter, CaFCP’s public website and monthly subscriber newsletter.

www.cafcp.org	Apr-12	May-12	Jun-12
<b>Number of visits</b>	25,284	27,283	28,240
<b>Average time spent on site</b>	1:54	2:02	2:20
<b>Most visited pages</b>	Home page FAQ Station map Vehicle progress Station progress	Home page Station map FAQ Vehicle progress Station progress	Home page Station map How do you go? blog FAQ Vehicle progress
<b>Most searched keywords on Google to land on CaFCP website</b>	where does hydrogen come from california fuel cell partnership difference between fuel cell and battery cafcp	where does hydrogen come from california fuel cell partnership cafcp difference between fuel cell and battery	california fuel cell partnership where does hydrogen come from cafcp difference between fuel cell and battery difference between battery and



	difference between battery and fuel cell	what are round robing tests hydrogen	fuel cell
<b>Most searched keywords on cafcpc.org search engine</b>	directions electric vehicles fuel cells range "fuelcell energy"	bill elrick careers cost action plan career	careers catherine dunwoody george bush steering team 2011 SEMICON WEST
<b>Most referred websites</b>	google.com hydrogenhighway.ca.gov bing.com yahoo.com en.wikipedia.org	google.com hydrogenhighway.ca.gov yahoo.com bing.com fuelcells.org	google.com facebook.com hydrogenhighway.ca.gov bing.com yahoo.com

### Facebook

Facebook is a social media network we have been using to post videos, articles, information, and to allow those with an interest in hydrogen and fuel cells to learn and connect.

The Facebook page can be a useful tool to gain awareness and promote upcoming CaFCP events. The first test was promoting the 2009 Santa Monica Alt Fuels. A number of conference attendees heard about the event through our Facebook page. The immediate goal is to increase page traffic and interaction. The longer-term goal is for fans to use it to share information and links with each other.

FACEBOOK	Apr-12	May-12	Jun-12
<b>New likes</b>		23	19
<b>Lifetime likes</b>		1,901	1,910
<b>Post Views*</b>		3,569	3,840
<b>Page Posts*</b>	Filled up Toyota FCHV-adv... (467) This caught me by surprise!... (387) We setup our Nissan Xtrail... (381) AlumiFuel Power Corp ann... (357)	Fuel Cell Insider released... (501) Catherine Dunwoody... (422) Most of the staff are at the... (345) "I'm excited to be driving... (342)	GO FOR A DRINK!... (485) GO WHERE THE WIND TAKES YOU (419) The Hyundai Tucson ix FCEV... (404) GO FOR THE EXCITEMENT!... (360)

### Twitter

Twitter is one of the fastest growing social media tools today. CaFCP created its Twitter account on February 2, 2009 as part of a "listening" phase. After developing the Communications Team Social Media Strategy plan, it was found that Twitter would be a tool used for communicating in real time. CaFCP's tweets are focused on factual information about CaFCP member activity and technology.

TWITTER	Apr-12	May-12	Jun-12
<b>Followers</b>	561	579	617
<b>Tweets</b>	3402	3513	3780

**Legislative and Environmental Outreach**

MEETING	DATE	MET WITH
Governor Brown's Office	05/01/12	Cliff Rechtschaffen
ALAC	05/04/12	Bonnie Holmes-Gen
PEVC at EVS 26	05/08/12	Diane Wittenberg, PEVC Nancy Ryan, CPUC
Congresswoman Jackie Speier	05/10/12	Peter Viola, Legislative Assistant
Congressman Mike Thompson	05/11/12	Nicole Rohr, Legislative Assistant
U.S. Department of Energy	05/15/12	Holmes Hummel, Senior Policy Advisor to DOE Undersecretary David Sandalow
Congressman Jeff Denham	05/17/12	Ryan Hanretty, Legislative Assistant
Office of Management and Budget	05/17/12	Ed Etzkorn, Program Examiner for EERE
Congressman Mike Thompson	06/18/12	Congressman Mike Thompson
U.S. Department of Energy	06/20/2012	Pat Davis, Vehicle Technologies Program Manager
U.S. Environmental Protection Agency	06/20/2012	Margo Oge, Director, Office of Transportation and Air Quality Karl Simon, Director, Transportation and Climate Division

## GO Campaign

On June 11, 2012 CaFCP Communications Team staff launched the GO Campaign through the public website and our various social media outlets. [www.caafcp.org/go](http://www.caafcp.org/go)



Our blog for the GO Campaign (How do you go?) generated over 500 viewers in its first 3 weeks. On days that the GO Campaign ads were posted (pictured above), our public website and Facebook received 100% more traffic. Each GO Campaign ad was retweeted by our Twitter friends several times throughout the week.

## Sacramento Business Journal Social Madness contest

To push our GO Campaign, we also participated in the Sacramento Business Journal's Social Madness contest from June 1 to June 18. In 2 weeks, the contest helped generate over 20 new Twitter followers and over 37 new Facebook friends.

## Upcoming CaFCP Activities for Q3, 2012

- HVAS optimized antenna Project
- Road Map implementation projects (white papers/communication documents)
- Continuation of the GO campaign (currently slated as a 10 week campaign)
- CaFCP Working Group, September 19-20, Southern CA (site TBD)

BOARD MEETING DATE: September 7, 2012

AGENDA NO. 31

REPORT: Status Report on Regulation XIII – New Source Review

SYNOPSIS: This report presents the federal final determination of equivalency for January 2010 through December 2010. As such, it provides information regarding the status of Regulation XIII – New Source Review in meeting federal NSR requirements and shows that AQMD’s NSR program is in final compliance with applicable federal requirements from January 2010 through December 2010.

COMMITTEE: Stationary Source, July 27, 2012

RECOMMENDED ACTION:  
Receive and file the attached report.

Barry R. Wallerstein, D.Env.  
Executive Officer

MN:WCT:GT:GEI

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## SUMMARY

AQMD’s NSR Rules and Regulations are designed to comply with federal and state Clean Air Act requirements and to ensure that emission increases from new and modified sources do not interfere with efforts to attain and maintain the federal and state air quality standards, while economic growth in the South Coast region is not unnecessarily impeded. Regulation XIII - New Source Review regulates and accounts for all emission changes (both increases and decreases) from the permitting of new, modified, and relocated stationary sources within AQMD, excluding NO<sub>x</sub> and SO<sub>x</sub> sources that are subject to Regulation XX – Regional Clean Air Incentives Market (RECLAIM)<sup>1</sup>.

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<sup>1</sup> While the RECLAIM program is different than command and control rules for NO<sub>x</sub> and SO<sub>x</sub> and it provides greater regulatory flexibility to businesses, its NSR requirements, as specified in Rule 2005, are designed to comply with the governing principles of NSR contained in the federal Clean Air Act (CAA) and the California State Health and Safety Code.

Rule 1315 – Federal New Source Review Tracking System, was most recently adopted by the Governing Board on February 4, 2011 to maintain AQMD’s ability to issue permits to major sources that require offsets, but obtain offset credits from the AQMD’s Priority Reserve under Rule 1309.1, and/or that are exempt from offsets under AQMD Rule 1304. In addition, Rule 1315 requires that, commencing with calendar year 2010, and for each calendar year thereafter, the Executive Officer prepare a Preliminary Determination of Equivalency (PDE) and Final Determination of Equivalency (FDE) which cover NSR activities for twelve-month periods. As required by Rule 1315, the calendar year 2010 PDE was reported to the AQMD Governing Board at the February 3, 2012 Governing Board meeting, and the FDE will be reported at the September 7, 2012 Governing Board meeting. Rule 1315 also requires the Executive Officer to aggregate and track offsets debited from and deposited to AQMD’s offset accounts for specified periods between October 1, 1990 and December 31, 2005 and each calendar year from 2006 through 2030 for purpose of making periodic determinations of compliance. The last annual report submitted to the AQMD Governing Board on February 3, 2012 presented the FDE for calendar years 2007 through 2009 and the PDE for calendar year 2010, and demonstrated that AQMD’s NSR program continues to meet the federal offset requirements.

This report presents the FDE covering the calendar year 2010 reporting period, and demonstrates compliance with federal NSR requirements by establishing aggregate equivalence with federal offset requirements for sources that were not exempt from federal offset requirements, but were either exempt from offsets or obtained their offsets from AQMD pursuant to Regulation XIII.

The FDE for calendar year 2010 is summarized in Table 1. Additionally, the projections of AQMD’s offset account balances for January 2011 through December 2011 and January 2012 through December 2012 as specified and required pursuant to Rule 1315(e) are presented in Table 2. These results demonstrate that there were, and project that there will be, adequate offsets available to mitigate all applicable emission increases during these reporting periods. This report, therefore, demonstrates that, for calendar years 2010 through 2012, AQMD’s NSR program continues to meet and is projected to meet federal offset requirements and is equivalent to those requirements on an aggregate basis<sup>2</sup>. Although effective June 11, 2007, U.S. EPA designated the AQMD as attainment with federal CO standards, AQMD will continue to track and report CO accumulated credits and account balances for informational purposes only. As such, the CO accumulated credits and the account balance are reported for calendar years 2010 through 2012.

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<sup>2</sup> AQMD’s NSR program is deemed to be equivalent to federal offset requirements because AQMD’s ending offset account balances remained positive, indicating there were adequate offsets during these reporting periods.

**Table 1**  
**FDE for January 2010 through December 2010**

DESCRIPTION	VOC	NOx	SOx	CO	PM10
<b>2009 Actual Ending Balance* (ton/day)</b>	<b>72.64</b>	<b>28.82</b>	<b>2.68</b>	<b>17.45</b>	<b>12.33</b>
2010 Discount of Credits for Surplus Adjustment** (ton/day)	-0.44	-3.73	0.00	-0.06	0.00
<b>2010 Starting Balance (ton/day)</b>	<b>72.20</b>	<b>25.09</b>	<b>2.68</b>	<b>17.39</b>	<b>12.33</b>
2010 Actual Total Credits*** (lb/day)	17,362	3,722	631	9,050	2,795
2010 Actual Total Debits*** (lb/day)	-1,732	-2,110	-36	0	-462
<b>Sum of Actual Credits/Debits*** (lb/day)</b>	<b>15,630</b>	<b>1,612</b>	<b>595</b>	<b>9,050</b>	<b>2,333</b>
<b>Sum of Actual Credits/Debits*** (ton/day)</b>	<b>7.82</b>	<b>0.81</b>	<b>0.30</b>	<b>4.53</b>	<b>1.17</b>
<b>2010 Actual Ending Balance**** (ton/day)</b>	<b>80.02</b>	<b>25.90</b>	<b>2.98</b>	<b>21.92</b>	<b>13.50</b>

\* "2009 Actual Ending Balance" as reported to AQMD's Governing Board on February 3, 2012 under Agenda No. 25, "Status Report on Regulation XIII – New Source Review."

\*\* This adjustment is surplus at the time of use discount, which is also discussed in Rule 1315(c)(4).

\*\*\* For an explanation of the sources of debits and credits please refer to pages 7 and 8 of this report, as well as Rule 1315(c) and the Rule 1315 staff report. Credits are shown as positive and Debits as negative, while sum of Credits/Debits and Net Activity are shown as positive or negative, as appropriate.

\*\*\*\* "2010 Actual Ending Balance" equals the "2009 Actual Ending Balance" plus any surplus adjustments and the sum of actual credits and actual debits.

**Table 2**  
**Projections of AQMD's Federal Offset Account Balances for**  
**January 2011 through December 2011, and**  
**January 2012 through December 2012**

DESCRIPTION	VOC	NOx	SOx	CO	PM10
<b>2010 Actual Ending Balance* (ton/day)</b>	<b>80.02</b>	<b>25.90</b>	<b>2.98</b>	<b>21.92</b>	<b>13.50</b>
2011 Projected Discount of Credits for Surplus Adjustment** (ton/day)	-3.17	-1.04	0.00	-0.03	-0.20
<b>2011 Projected Starting Balance (ton/day)</b>	<b>76.85</b>	<b>24.86</b>	<b>2.98</b>	<b>21.89</b>	<b>13.30</b>
2011 Total Projected Credits*** (lb/day)	12,220	3,920	440	4,480	1,520
2011 Total Projected Debits*** (lb/day)	-500	-720	-20	0	-100
<b>2011 Sum of Projected Credits/Debits *** (lb/day)</b>	11,720	3,200	420	4,480	1,420
<b>2011 Sum of Projected Credits/Debits *** (ton/day)</b>	<b>5.86</b>	<b>1.60</b>	<b>0.21</b>	<b>2.24</b>	<b>0.71</b>
<b>2011 Projected Ending Balance**** (ton/day)</b>	<b>82.71</b>	<b>26.46</b>	<b>3.19</b>	<b>24.13</b>	<b>14.01</b>
2012 Projected Discount of Credits for Surplus Adjustment** (ton/day)	-3.28	-1.06	0.00	-0.04	-0.21
<b>2012 Projected Starting Balance (ton/day)</b>	<b>79.43</b>	<b>25.40</b>	<b>3.19</b>	<b>24.09</b>	<b>13.80</b>
2012 Total Projected Credits*** (lb/day)	12,220	3,920	440	4,480	1,520
2012 Total Projected Debits*** (lb/day)	-500	-720	-20	0	-100
<b>2012 Sum of Projected Credits/Debits *** (lb/day)</b>	11,720	3,200	420	4,480	1,420
<b>2012 Sum of Projected Credits/Debits *** (ton/day)</b>	<b>5.86</b>	<b>1.60</b>	<b>0.21</b>	<b>2.24</b>	<b>0.71</b>
<b>2012 Projected Ending Balance***** (ton/day)</b>	<b>85.29</b>	<b>27.00</b>	<b>3.40</b>	<b>26.33</b>	<b>14.51</b>

\* "2010 Actual Ending Balance" is as shown in Table 1.

\*\* This adjustment is surplus at the time of use discount, which is also discussed in Rule 1315(c)(4).

\*\*\* For an explanation of the sources of debits and credits please refer to pages 7 and 8 of this report, as well as Rule 1315(c) and the Rule 1315 staff report. Credits are shown as positive and Debits as negative, while sum of Credits/Debits and Net Activity are shown as positive or negative, as appropriate.

\*\*\*\* "2011 Projected Ending Balance" equals the "2010 Actual Ending Balance" plus any surplus adjustments and the sum of projected credits and projected debits.

\*\*\*\*\* "2012 Projected Ending Balance" equals the "2011 Projected Ending Balance" plus any surplus adjustments and the sum of projected credits and projected debits.

## **BACKGROUND**

AQMD originally adopted its New Source Review Rules and Regulations (NSR program) in 1976. U.S. EPA approved AQMD's NSR program into California's State Implementation Plan (SIP) initially on January 21, 1981 (46 FR 5965) and again on December 4, 1996 (61 FR 64291). Most recently, U.S. EPA approved AQMD's May 3, 2002 Rule 1309.1 amendments into the SIP on June 19, 2006 (71 FR 15656). The original program has evolved into the current version of the Regulation XIII rules in response to federal and state legal requirements and the changing needs of the local environment and economy. Specific amendments to the NSR rules were adopted by AQMD's Governing Board on December 6, 2002 to facilitate and provide additional options for credit generation and use. Rule 1315 was adopted and re-adopted on September 8, 2006 and August 3, 2007, respectively. Rule 1309.1 was amended and replaced on September 8, 2006 and August 3, 2007, respectively. On November 3, 2008, in response to a law suit filed by a group of environmental organizations, a California State Superior Court Judge in the County of Los Angeles invalidated the August 3, 2007 adopted Rule 1315 and amendments to Rule 1309.1, and prohibited AQMD from taking any action to implement Rule 1315 or the amendments to Rule 1309.1 until it had prepared a new environmental assessment under the California Environmental Quality Act (CEQA). On February 4, 2011 AQMD adopted a revised and enhanced version of Rule 1315, which included a new CEQA assessment. The Governing Board decided not to readopt the Rule 1309.1 amendments allowing power plants to access credits from the Priority Reserve. The CEQA assessment was upheld by the Los Angeles Superior Court. U.S. EPA approved Rule 1315 on May 25, 2012 (77 FR 31200). The approval was effective June 25, 2012.

One element of AQMD's NSR program design is to offset emission increases in a manner at least equivalent to federal and state statutory NSR requirements. To this end, AQMD's NSR program implements the federal and state statutory requirements for NSR and ensures that construction and operation of new, relocated and modified stationary sources does not interfere with progress towards attainment of the National and State Ambient Air Quality Standards. AQMD's computerized emission tracking system is utilized to demonstrate equivalence with federal and state offset requirements on an aggregate basis. Specific NSR requirements of federal law are presented below.

### **Federal Law**

The NSR requirements of federal law vary with respect to the area's attainment status and classification. Based on their classification, the South Coast Air Basin (SOCAB) and Salton Sea Air Basin (SSAB) must comply with the requirements for extreme and severe non-attainment areas, respectively, for ozone precursors (*i.e.*, VOC and NO<sub>x</sub>). Both the SOCAB and the SSAB must at this time comply with the requirements for serious non-attainment areas for PM<sub>10</sub> and its precursors (*i.e.*, VOC, NO<sub>x</sub>, and SO<sub>x</sub>). AQMD has requested that both the SOCAB and the PM<sub>10</sub> nonattainment area of the SSAB within AQMD be redesignated as having attained the federal PM<sub>10</sub> standard.



U.S. EPA has not yet acted on these requests. SSAB is considered attainment for CO. Although effective June 11, 2007, U.S. EPA designated the SOCAB as attainment with federal CO standards, AQMD will continue to track and report CO accumulated credits and account balances for informational purposes only. Both SOCAB and SSAB are considered attainment for SO<sub>2</sub> and NO<sub>2</sub>; however SO<sub>x</sub> and NO<sub>x</sub> are precursors to pollutants for which both SOCAB and SSAB are designated as nonattainment<sup>3</sup>. The Mojave Desert Air Basin (MDAB) is currently classified as moderate nonattainment for ozone precursors (*i.e.*, VOC and NO<sub>x</sub>) and as attainment for NO<sub>x</sub>, SO<sub>x</sub>, and CO. This air basin is considered “unclassified” for the federal PM<sub>10</sub> standard (which is treated as “attainment,” meaning no offsets are required). Federal law requires the use of LAER and offsets for emissions of nonattainment pollutants (or their precursors) for new, modified, and relocated stationary sources, when the source is considered a major stationary source<sup>4</sup> for the nonattainment pollutants (or their precursors). Federal law requires the use of Lowest Achievable Emission Rate (LAER) and offsets for new, modified, and relocated major stationary sources. This report demonstrates compliance with the federal NSR offsets requirements.

## OVERVIEW OF ANALYSIS METHODOLOGY

The two most important elements of federal nonattainment NSR requirements are LAER and emission offsetting for major sources. As set forth in AQMD’s *Best Available Control Technology (BACT) Guidelines*, AQMD’s BACT requirements are at least as stringent as federal LAER for major sources. Furthermore, the NSR emission offset requirements that AQMD implements through its permitting process ensure that sources provide emission reduction credits (ERCs) to offset their emission increases in compliance with federal requirements. As a result, these sources each comply with federal offset requirements by providing their own ERCs. However, certain sources are exempt from AQMD’s offset requirements pursuant to Rule 1304 or qualify for offsets from AQMD’s Community Bank (applications received between October 1, 1990 and February 1, 1996 only) or Priority Reserve, both pursuant to Rule 1309.1. AQMD has determined that providing offset exemptions and the Priority Reserve (as well as the previously administered Community Bank) is important to the NSR program and the local economy while encouraging installation of BACT. Therefore, AQMD has assumed the responsibility of providing the necessary offsets for exempt sources, the Priority Reserve, and the Community Bank. This report examines deposits to and

<sup>3</sup> SO<sub>x</sub> is a precursor to PM<sub>10</sub> and NO<sub>x</sub> is a precursor to both PM<sub>10</sub> and ozone.

<sup>4</sup> The major source thresholds for SOCAB, SSAB and MDAB, based on their attainment status during the calendar year 2010 reporting period are summarized below:

Pollutant	SOCAB	SSAB	MDAB
VOC	10 ton/year	25 ton/year	100 ton/year
NO <sub>x</sub>	10 ton/year	25 ton/year	100 ton/year
SO <sub>x</sub>	100 ton/year	100 ton/year	100 ton/year
PM <sub>10</sub>	70 ton/year	70 ton/year	100 ton/year
CO	50 ton/year	100 ton/year	100 ton/year

withdrawals from AQMD's emission offset accounts during calendar year 2010 and demonstrates programmatic equivalence on an aggregate basis with federal emission offset requirements for the sources exempt from providing offsets and the sources that receive offsets from the Priority Reserve or the Community Bank.

### **AQMD's Offset Accounts**

For the purposes of this report, federal debit and credit accounting for AQMD's offset accounts was conducted pursuant to the same procedures previously agreed to by U.S. EPA and as delineated in Rule 1315 and described in the staff report. Each of the pollutants subject to offset requirements has its own federal offset account. AQMD's NSR program is considered to provide equivalent or greater offsets of emissions as required by federal requirements for each subject pollutant provided the balance of offsets left in AQMD's federal offset account for each pollutant remains positive, indicating that there were adequate offsets available.

#### *Debit Accounting*

AQMD tracks all emission increases that are offset through the Priority Reserve or the Community Bank, as well as all increases that are exempt from offset requirements pursuant to Rule 1304 – Exemptions. These increases are all debited from AQMD's federal offset accounts when they occur at federal major sources. For federal equivalency demonstrations, AQMD uses an offset ratio of 1.2-to-1.0 for extreme non-attainment pollutants (ozone and ozone precursors, *i.e.*, VOC and NO<sub>x</sub>) and uses 1.0-to-1.0 for all other non-attainment pollutants (non-ozone precursors, *i.e.*, SO<sub>x</sub>, CO, and PM<sub>10</sub>) to offset any such increases. That is, 1.2 pounds are deducted from AQMD's offset accounts for each pound of maximum allowable permitted potential to emit VOC or NO<sub>x</sub> increase at a federal source and 1.0 pound is deducted for each pound of maximum allowable permitted potential to emit SO<sub>x</sub>, CO, or PM<sub>10</sub> at a federal source. A more detailed description of federal debit accounting is provided in the Rule 1315 staff report and Rule 1315(c)(2).

#### *Credit Accounting*

When emissions from a permitted source are permanently reduced (*e.g.*, installation of control equipment, removal of the source) and the emission reduction is not required by rule or law and is not called for by an AQMP control measure that has been assigned a target implementation date<sup>5</sup>, the permit holder may apply for ERCs for the pollutants reduced. If the permit holder for the source generating the emission reduction had previously received offsets from AQMD or has a "positive NSR balance" (*i.e.*, pre-1990 net emission increase), the quantity of AQMD offsets used or the amount of the positive NSR balance is subtracted from the reduction and "paid back" to AQMD's accounts prior to issuance of an ERC pursuant to Rule 1306. In certain other cases, permit

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<sup>5</sup> Refer to Rule 1309(b) for a complete explanation of eligibility requirements.

holders do not always submit applications to claim ERCs or do not qualify to obtain ERCs for their equipment shutdowns or other eligible emission reductions. These unclaimed reductions are referred to as “orphan shutdowns” or “surplus reductions” and are deposited in AQMD’s offset accounts. ERCs provided as offsets by major sources in excess of the applicable federally required offset ratio and all ERCs provided as offsets by minor sources not subject to federal offset requirements are also deposited in AQMD’s federal offset accounts. A more detailed description of federal credit accounting is provided in Rule 1315(c)(3)(A) and the Rule 1315 staff report.

### **DETERMINATION OF EQUIVALENCY WITH FEDERAL OFFSET REQUIREMENTS**

The federal offset requirements FDE for calendar year 2010 and the projections for calendar years 2011 and 2012 are summarized in Tables 1 and 2, respectively. The detailed listing of actual final withdrawals, deposits and sum of withdrawals and deposits are shown in Attachment I to this letter. Table A of Attachment I presents the final total emission increases withdrawn from AQMD’s offset accounts from January 2010 through December 2010. Final deposits to AQMD’s offset accounts during the same period are further summarized in Table B. The sums of final withdrawal and deposit activities are subsequently presented in Table C. Tables A through C present the results of the federal FDE for the calendar year 2010 reporting period.

These account balances, shown in Tables A through C, reflect the tracking sequence described under Rule 1315(c)(5).

### **CONCLUSIONS**

The analysis presented in this report demonstrates that for calendar year 2010, AQMD’s NSR program provides equivalent offsets to those required by federal NSR requirements and is at least equivalent to the federal requirements on an aggregate basis. This conclusion is based on the fact that the final ending offset account balances for this calendar year reporting period (January 2010 through December 2010), as shown in Tables 1, remained positive for all pollutants. In addition, AQMD’s final offset account balances for 2011 and 2012 are projected to remain positive. This means that the sum of actual deposits to and actual withdrawals from AQMD’s offset accounts during the 2010 reporting period was positive and, therefore, it demonstrates that AQMD’s NSR program is equivalent to federal NSR requirements.

### **ATTACHMENT**

I – Detailed listing of actual final debits, credits and sum of debits and credits.

## ATTACHMENT I

Detailed listing of actual final debits, credits and sum of debits and credits

**Table A**  
**Total Actual Debits from AQMD's Federal Offset Accounts**  
**(January 2010 through December 2010)**

<b>DISTRICT OFFSETS USED</b>	<b>VOC</b>	<b>NOx</b>	<b>SOx</b>	<b>CO</b>	<b>PM10</b>
Priority Reserve (lb/day)	80	1,426	0	0	0
Community Bank (lb/day)	0	0	0	0	0
Rule 1304 Exemptions (lb/day)	1,363	332	36	0	462
Sum Total of AQMD Offsets (lb/day)	1,443	1,758	36	0	462
1.2-to-1.0 Offset Ratio (lb/day)	289	352	N/A	N/A	N/A
<b>Total Actual Debits to AQMD Account (lb/day)</b>	<b>1,732</b>	<b>2,110</b>	<b>36</b>	<b>0</b>	<b>462</b>
<b>Total Actual Debits to AQMD Account (ton/day)</b>	<b>0.87</b>	<b>1.05</b>	<b>0.02</b>	<b>0</b>	<b>0.23</b>

**Table B**  
**Total Actual Credits to AQMD's Federal Offset Accounts**  
**(January 2010 through December 2010)**

<b>CREDITS RECEIVED</b>	<b>VOC</b>	<b>NOx</b>	<b>SOx</b>	<b>CO</b>	<b>PM10</b>
Major Source Orphan Credits (lb/day)	7,639	2,194	0	7,523	106
Minor Source Orphan Credits (lb/day)	14,245	2,526	786	3,790	3,386
Total Orphan Credits (lb/day)	21,884	4,720	786	11,313	3,492
Adjustment to Actual Emissions* (lb/day)	4,377	944	157	2,263	698
Discount of ERCs** (lb/day)	0	0	0	0	0
Creditable Minor Source ERC Use (lb/day)	26	0	2	0	1
Creditable Major Source ERC Use*** (lb/day)	-171	-54	0	0	0
<b>Total Actual Credits to AQMD Account (lb/day)</b>	<b>17,362</b>	<b>3,722</b>	<b>631</b>	<b>9,050</b>	<b>2,795</b>
<b>Total Actual Credits to AQMD Account (ton/day)</b>	<b>8.68</b>	<b>1.86</b>	<b>0.32</b>	<b>4.53</b>	<b>1.40</b>

\* Adjustment of orphan shutdown and orphan reduction offset credits deposited in AQMD offset accounts to correct from potential emissions to actual emissions as discussed in Rule 1315(c)(3)(B)(i).

\*\* Prior to issuance of ERCs, they are discounted for NSR "Payback," which includes payback of NSR balance, Community Bank and Priority Reserve allocations, and offset exemptions, as discussed in Rule 1315(c)(3)(A)(v) and Rule 1306(c).

\*\*\* Credits to Creditable Major Source ERC Use for calendar year 2010 are zero for all pollutants. However, adjustments are made due to credits inadvertently taken for VOC and NOx in the February 3, 2012 NSR Status Report for calendar years 2007 through 2009 and adjustments are made to reduce credits from Creditable Major Source ERC Use as follows: -54 lb/day VOC (2007), -54 lb/day NOx (2007), -82 lb/day VOC (2008), and -35 lb/day VOC (2009) for a total of -171 lb/day VOC and -54 lb/day NOx.

**Table C**  
**Sum of Final Credits/Debits Activities in AQMD's Federal Offset Accounts**  
**(January 2010 through December 2010)**

	VOC	NOx	SOx	CO	PM10
Total Actual Debits* (lb/day)	-1,732	-2,110	-36	0	-462
Total Actual Credits* (lb/day)	17,362	3,722	631	9,050	2,795
<b>Sum of Actual Debits(-)/Credits(+)* (lb/day)</b>	<b>15,630</b>	<b>1,612</b>	<b>595</b>	<b>9,050</b>	<b>2,333</b>
<b>Sum of Actual Debits(-)/Credits(+)* (ton/day)</b>	<b>7.82</b>	<b>0.81</b>	<b>0.30</b>	<b>4.53</b>	<b>1.17</b>

\* Debits are shown as negative and Credits as positive, while their sum is shown as negative or positive, as appropriate.

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BOARD MEETING DATE: September 7, 2012

AGENDA NO. 32

PROPOSAL: Amend Rule 1110.2 - Emissions from Gaseous- and Liquid-Fueled Engines

SYNOPSIS: Consistent with staff's Technology Assessment findings, the proposed amendments would re-establish the previously adopted emission limits for biogas-powered internal combustion engines. The proposed amendment would provide additional time for compliance; a compliance option for a longer averaging time for engines with superior performance in achieving lower mass emissions; a compliance option that further extends the effective dates for certain engines based on a compliance flexibility fee; and include other clarifications.

COMMITTEE: Stationary Source, April 20, May 18, and June 15, 2012

**RECOMMENDED ACTIONS:**

Adopt the attached resolution:

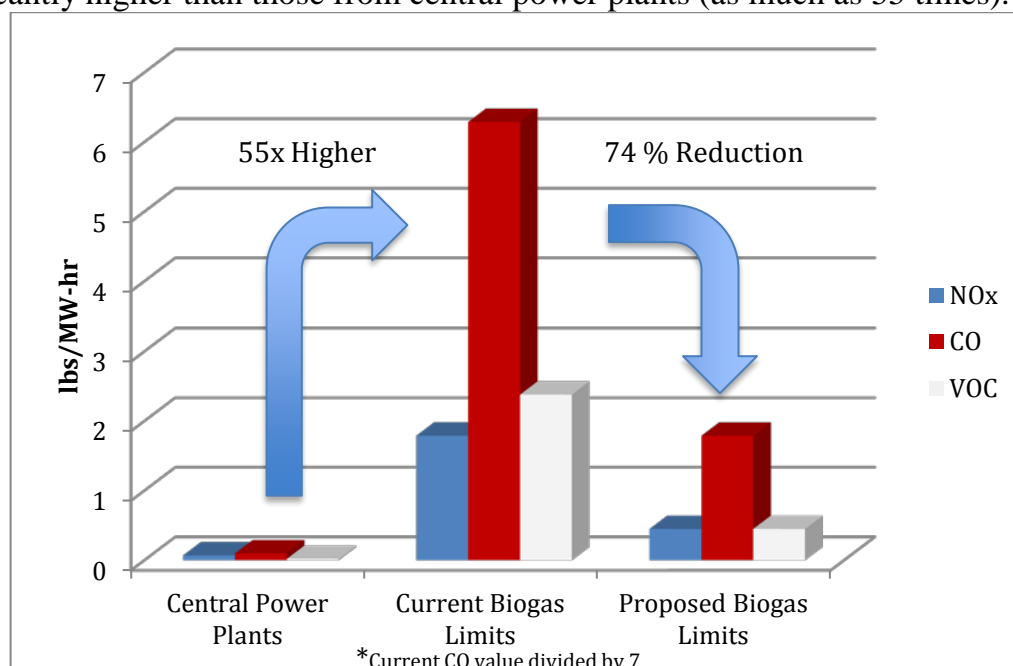
1. Receiving and filing the Technology Assessment Report;
2. Certifying the CEQA Addendum to the 2008 Final Environmental Assessment; and
3. Amending Rule 1110.2 - Emissions from Gaseous- and Liquid-Fueled Engines.

Barry R. Wallerstein, D.Env.  
Executive Officer



## Background

Rule 1110.2 establishes emission limits of NO<sub>x</sub>, VOC, and CO for stationary, non-emergency gaseous- and liquid-fueled engines, including the 55 engines in this source category, that are fueled by landfill or digester gas (biogas). Biogas, a by-product of municipal wastewater treatment and landfill operations, is considered a renewable energy source and is often combusted as fuel in biogas engines to produce power for onsite and/or offsite use. While they are one of several technologies available to harness power from biogas, the power produced by biogas engines has a very undesirable emissions footprint. The emission limits for new biogas engines are the highest of all engines, even higher than diesel engines with BACT and on a per unit of power produced (per Megawatt-hour, MW-hr) basis, biogas engine emissions are significantly higher than those from central power plants (as much as 55 times).



**Figure 1. Emissions from Biogas ICEs versus Central Power Plants**

Rule 1110.2 was amended on February 1, 2008 to lower the emission limits of natural gas and biogas engines to BACT levels for NO<sub>x</sub> and VOC and to levels close to BACT for CO. The limits for natural gas engines at or above 500 bhp took effect on July 1, 2010, while those for natural gas engines below 500 bhp took effect on July 1, 2011. Biogas engines were given until July 1, 2012 to comply with the new limits.

The amendment and adopting resolutions of Rule 1110.2 in February 2008 directed staff to conduct a Technology Assessment to address the availability, feasibility, cost-effectiveness, compliance schedule, and global warming gas impacts of biogas engine control technologies and report back to the Governing Board no later than July 2010. Immediately after the 2008 amendment, staff began work on the Technology Assessment and followed the progress of several technology demonstration projects.

In July 2010, the Governing Board received and filed an Interim Technology Assessment by staff, which summarized the biogas cleanup and biogas engine control technologies to date and the status of on-going demonstration projects. Due to the delays caused by the permit moratorium in 2009, the release of another report was recommended upon the completion of these projects. The Interim Technology Assessment concluded that feasible, cost-effective technology that could support the feasibility of the July 2012 emission limits was available, but that the delay in the demonstration projects would likely necessitate an adjustment to the July 1, 2012 compliance date of Rule 1110.2.

The Final Technology Assessment attached to the staff report summarizes staff's findings to date regarding the feasibility of the biogas engine emission limits. Data collected from a completed demonstration project at Orange County Sanitation District (OCSD) and from the Ox Mountain landfill project in the Bay Area provides substantial evidence in support of the proposed emission limits for biogas engines with the use of oxidation catalysts and selective catalytic reduction (SCR) with biogas cleanup. The technology demonstration projects have shown that technology is available that can achieve significant reductions in NO<sub>x</sub>, VOC, and CO. In addition to feasibility, the Final Technology Assessment also includes information on cost-effectiveness, compliance schedule, global warming impacts, and the impacts of potential flaring, as well as other technologies that can provide facility operators with viable alternatives for meeting the proposed amendment's compliance requirements.

### **Public Process**

The Biogas Technology Advisory Committee was formed to assist staff with its technology assessment efforts for biogas engines. Since the 2008 amendment, staff has held nine Biogas Technology Advisory Committee meetings with representatives from affected facilities, manufacturers, consultants and other interested parties. In October 2010 staff met with the regulated community to discuss cost issues related to the emission standard adopted as part of the 2008 amendment. Since the July 2010 Interim Report, the Biogas Technology Advisory Committee met in September 2011, January 2012, April 2012, May 2012, and August 2012. Two Public Workshops were held on February 2012 and April 2012. Staff also has had numerous meetings with control equipment vendors and also manufacturers of emerging technologies that may provide an alternative to electrical power generation by traditional internal combustion methods. In addition, staff has met individually with nearly every biogas facility operator to discuss site-specific issues, technologies, long-term plans for existing biogas engines, and costs. Several site visits were also conducted by staff at the affected facilities.

### **Affected Facilities**

Rule 1110.2 applies to stationary and portable reciprocating internal combustion engines (ICEs) over 50 brake horsepower (bhp). PAR 1110.2 affects the subset that contains engines fueled with biogas, which are those that are operated at landfills and wastewater treatment plants. There are currently 55 biogas engines operating in the Basin. Of these engines, 27 are digester gas-fueled and 28 are landfill gas-fueled. These engines are operated by 13 independent operators at 22 locations.

### **Proposed Amendments**

The key proposed amendments can be summarized as follows:

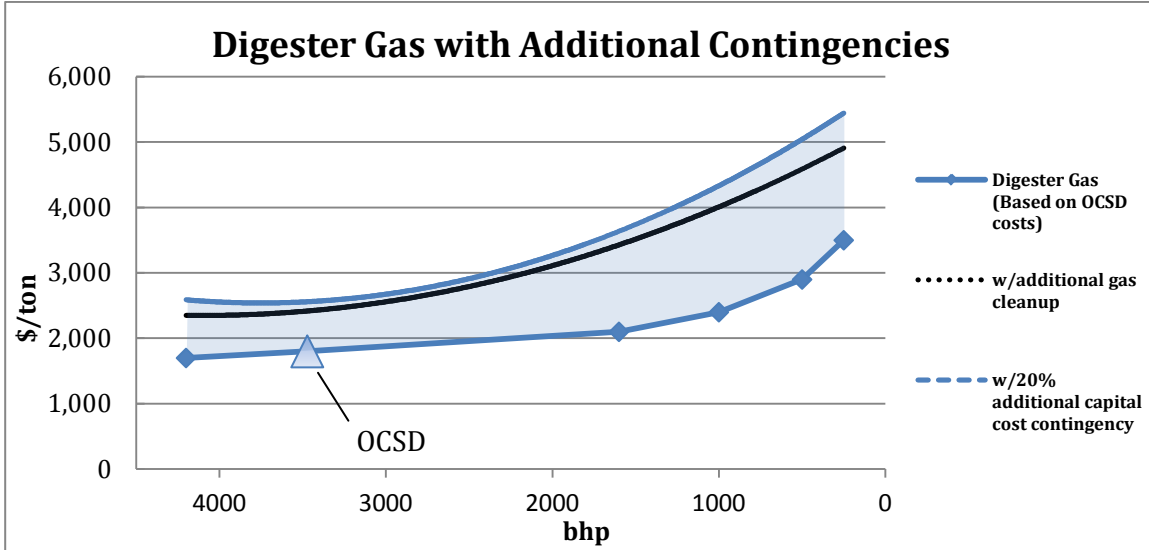
- Extend the effective date of the previously adopted 2012 limits by three and a half years. The new effective date will be January 1, 2016 for all biogas engines. Operators that achieve early compliance by January 1, 2015 will receive a refund of the biogas engine application permit fees.
- Provide a compliance option with a longer averaging time (monthly averaging the first 4 months of engine operation with 24-hour averaging thereafter) to engine operators that can demonstrate through continuous emission monitoring systems (CEMS) data emission levels at least 10 percent lower than allowable under the rule's proposed concentration limits.
- Provide an alternate compliance option to give private operators under long term fixed price power purchase agreements entered into prior to the February 1, 2008 amendments and extending beyond the January 1, 2016 compliance date additional time (up to two years beyond the compliance date) to comply with the emission limits with the payment of a compliance flexibility fee.
- Minor administrative changes and clarifications

### **Emission Reductions and Cost Effectiveness**

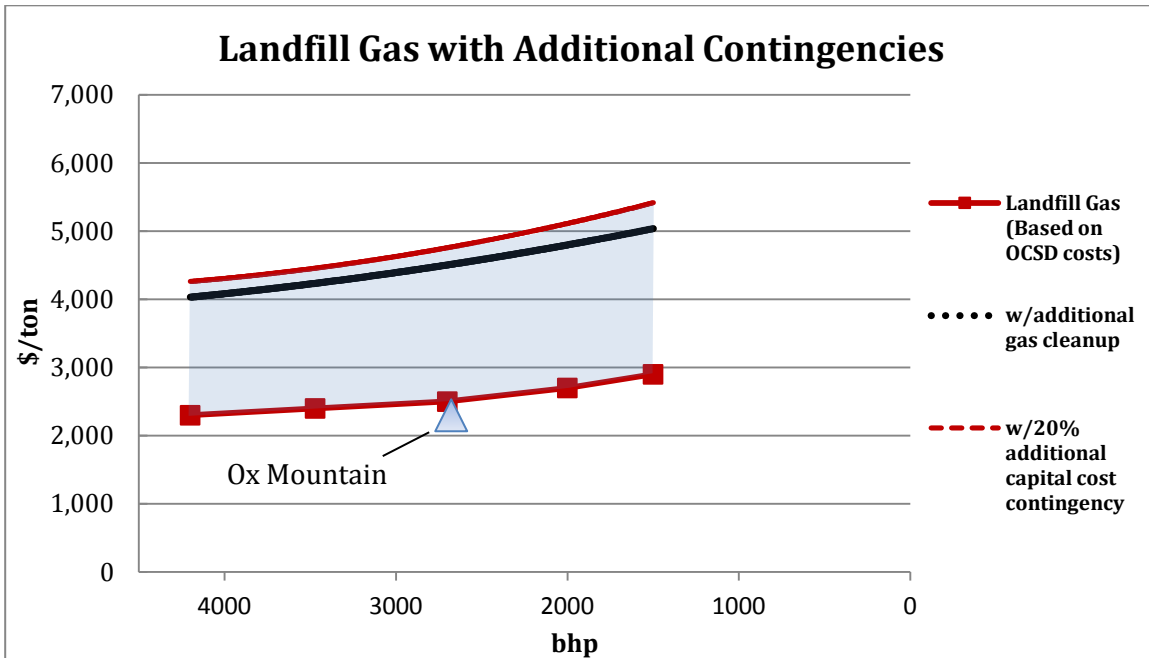
The proposed amendments will result in up to 74% emission reductions on an aggregate basis. The emission reductions are estimated at 334 tons per year of NO<sub>x</sub> (0.9 tons per day), 178 tons per year of VOC (0.5 tons per day), and 7,302 tons per year of CO (20.0 tons per day). The reductions will occur in two steps. The bulk of the reductions are expected to occur during the first step and no later than January 1, 2016, while the remainder of the reductions will occur one to two years later when remaining biogas engines operating under the alternate compliance option all comply with the rule limits.

Using the District model, the cost effectiveness is estimated to range from \$1,700 to \$3,500 per ton of NO<sub>x</sub>, VOC, and CO/7 reduced. Staff also calculated cost effectiveness to account for additional contingencies, based on stakeholder feedback. With the additional contingencies, the cost effectiveness would range from \$2,600 to

\$5,900 per ton. All of the cost effectiveness estimates are within the range of estimates considered by the Governing Board as part of past rulemakings.



**Figure 2. Cost Effectiveness for Digester Gas (Catalytic Aftertreatment)**



**Figure 3. Cost Effectiveness for Landfill Gas (Catalytic Aftertreatment)**

## Key Issues

1. *Time for Implementation.* Stakeholders are requesting five years or an effective date of July 1, 2017 to properly plan, design, purchase, install the control equipment, and comply with the requirements of the rule.

*Response:* The current compliance schedule, as proposed, gives operators three and a half years for compliance, which is already one and a half years longer than what is typically offered to other regulated entities subject to similar control requirements and what was offered as part of the 2008 amendments. This extended schedule provides reasonable additional time for the completion of on-going projects and the stakeholders' decision making process for selecting the right control technology for their site. For those facilities that entered into long term power purchase agreements prior to the February 1, 2008 amendments and, arguably, unaware of the upcoming 2008 amendments, an alternate compliance option will make it possible to defer compliance up to two years from the effective date with the payment of a compliance flexibility fee, provided such contracts don't expire prior to the January 1, 2016 effective date.

2. *Cost of Compliance.* Stakeholders have commented that the capital and operating costs for cleaning up the biogas are very high and post-combustion control technologies such as Catalytic Oxidation and Selective Catalytic Reduction (SCR) are expensive to install and operate and argued that many of them will resort to flaring as a less costly alternative.

*Response:* Although there are significant costs involved with installing and operating the equipment, the environmental benefits are significant and, therefore, very cost effective. Given the state of air quality in the South Coast Air Basin and the size of the "black box," or Section 182(c)(5), emission reductions needed to meet the ambient air quality standards, it is not only reasonable, but also necessary, to rely on the reductions to be achieved with the proposed amendments. Staff has also analyzed extensively the potential impacts of flaring. While staff acknowledges that flaring of a renewable energy source is undesirable, biogas flaring, except for a small Greenhouse Gas disbenefit, has a much lower criteria pollutant footprint compared to that from biogas engines, even if one accounts for the power that needs to be generated by central power plants.

### **AQMP and Legal Mandates**

The California Health and Safety Code requires the AQMD to adopt an Air Quality Management Plan to meet state and federal ambient air quality standards and adopt rules and regulations that carry out the objectives of the AQMP. The proposed amendments of Rule 1110.2 will provide additional reductions that will aid in attaining more stringent federal ozone and particulate matter standards. Reductions in NO<sub>x</sub> will help in attaining the federal 24-hour and annual average PM<sub>2.5</sub> standard by 2014 and 2015, while reductions in NO<sub>x</sub> and VOC will aid in attaining the ozone standard in 2023.

### **California Environmental Quality Act (CEQA) Analysis**

Pursuant to the California Environmental Quality Act (CEQA) and AQMD Rule 110, SCAQMD staff has reviewed PAR 1110.2 to identify the appropriate CEQA document for evaluating potential adverse environmental impacts. Because the proposed project consists of changes to a previously approved project evaluated in a certified CEQA document and none of the conditions described in CEQA Guidelines §15162 calling for preparation of a subsequent CEQA document would occur, staff has concluded that an Addendum to the December 2007 Final Environmental Assessment: Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs), prepared pursuant to CEQA Guidelines §15164, is the appropriate CEQA document for the proposed project. Pursuant to CEQA Guidelines §15164(c) an addendum need not be circulated for public review.

### **Socioeconomic Analysis**

PAR 1110.2 would re-establish the concentration limits for biogas-fired engines at a later date, that is from 2012 to 2016. Furthermore, the universe of affected biogas-fired engines by PAR 1110.2 is currently at 55 engines, reduced from 65 engines evaluated as part of the 2008 amendments, which is a reduction of 14 percent of the total brake horsepower.

The technologies for complying with the concentration limits have remained the same since 2008 and costs of these technologies have stayed relatively constant. The additional time for compliance and fewer affected engines would result in fewer costs to the affected universe as a whole, compared to what was analyzed as part of the 2008 amendments. Therefore, given the fact that there are fewer engines to control and the control costs remained relatively constant compared to what was evaluated as part of the Socioeconomic Assessment conducted for the 2008 amendments to Rule 1110.2, the findings and conclusions of that analysis remain valid for this proposed amendment as well.

### **Resource Impacts**

Existing staff resources are adequate to implement the proposed amendments.

## **Attachments**

- A. Summary of Proposal
- B. Rule Development Process
- C. Key Contacts List
- D. Resolution and Attachment 1 to the Resolution
- E. Proposed Amended Rule
- F. Staff Report
- G. Assessment of Available Technology for Control of NO<sub>x</sub>, CO, and VOC Emissions from Biogas-Fueled Engines—Final Report
- H. Final Socioeconomic Assessment for Proposed Amended Rule 1110.2—Emissions from Gaseous- and Liquid-Fueled Engines, January 2008
- I. Addendum to Final Environmental Assessment for Proposed Amended Rule 1110.2—Emissions from Gaseous- and Liquid-Fueled Engines
- J. Final Environmental Assessment: Proposed Amended Rule 1110.2—Emissions from Gaseous- and Liquid-Fueled Engines, December 2007

**ATTACHMENT A**  
**SUMMARY OF PROPOSAL**

**Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines**

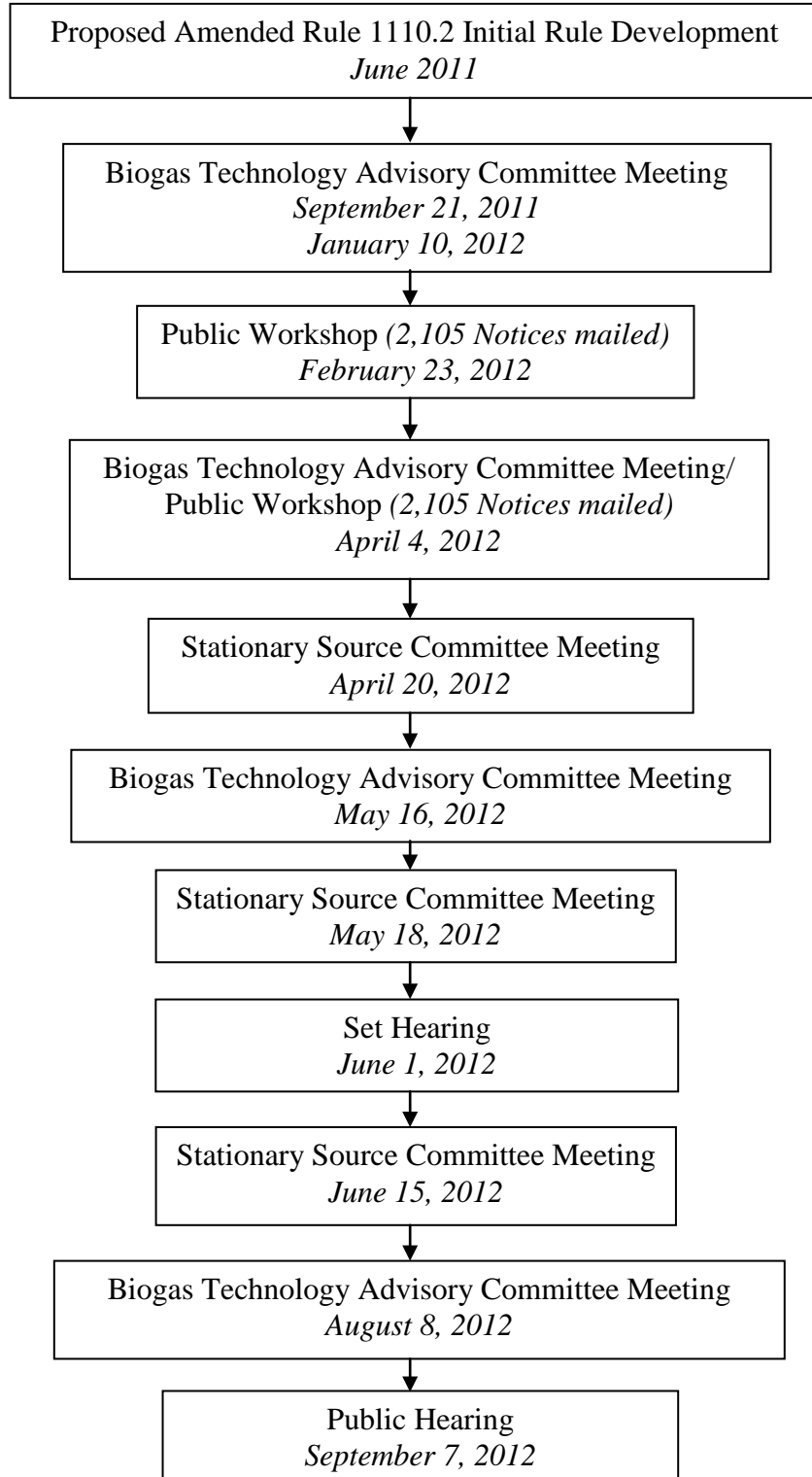
- Re-establish the effectiveness of the previously adopted 2012 limits for biogas engines of 11 ppmv NO<sub>x</sub>, 30 ppmv VOC, and 250 ppmv CO, each corrected to 15% O<sub>2</sub> on a dry basis. Allow operators three and a half more years to comply with the emission limits. The new effective date will be July 1, 2016 for all biogas engines.
- Biogas engines achieving early compliance by January 1, 2015 will have their permit application fees refunded.
- Provide a compliance option with a longer averaging time to engine operators that can demonstrate through continuous emissions monitoring system (CEMS) data emission levels at least 10 percent lower than allowable under the rule's proposed concentration limits over a four month period. An operator may utilize a monthly averaging time for the first 4 months of engine operation and up to a 24 hour averaging time thereafter.
- Provide a compliance option where engine operators that have entered into long term fixed price power purchase agreements before February 1, 2008 and extending beyond January 1, 2016 will receive additional time to comply (up to two years beyond January 1, 2016) with the payment of a compliance flexibility fee of \$47/bhp-yr.
- CEMS data procedures: not including zero data in averaging and using substitute data when NO<sub>x</sub> and/or CO emissions data have not been collected and do not meet the requirements of Rules 218 and 218.1.
- Rule clarification for allowing oxygen set point adjustments for maintaining compliance without returning to a more frequent portable analyzer testing schedule.
- Rule clarification for allowing a shutdown exemption period not lasting more than 30 minutes.
- Clarification in Staff Report allowing the temporary removal of a catalyst during the four-hour exemption period following an engine overhaul or major repair requiring removal of a cylinder head.
- Clarification in Staff Report allowing source tests in lieu of portable analyzer checks in the event a scheduled portable analyzer emissions check occurs during the same monitoring period as a regularly scheduled source test.
- Minor administrative changes to provide clarity with respect to references within the rule.



## ATTACHMENT B

### RULE DEVELOPMENT PROCESS

#### Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines



**Total time spent in rule development: 15 months**

**ATTACHMENT C**  
**KEY CONTACTS LIST**

Agency Representatives

Bay Area Air Quality Management District (BAAQMD)  
California Air Resources Board (CARB)  
California Association of Sanitation Agencies (CASA)  
Orange County Waste and Recycling (OCWR)  
Southern California Alliance of Publicly Owned Treatment Works (SCAP)  
U. S. Environmental Protection Agency (EPA)

Affected Facilities

Brea Parent 2007, LLC  
City of Riverside  
City of San Bernardino Municipal Water Department  
Eastern Municipal Water District (EMWD)  
Fortistar  
Inland Empire Utilities Agency (IEUA)  
J&A Whittier  
Los Angeles County Sanitation District (LACSD)  
Montauk Energy  
Orange County Sanitation District (OCSD)  
Riverside County Waste Management Department  
South Orange County Wastewater Authority (SOCWA)  
Waste Management

Other Interested Parties

Applied Filter Technology  
Environ Strategy Consultants, Inc.  
ESC Corporation  
Flex Energy  
Fuel Cell Energy  
Johnson Matthey  
Miratech Corporation  
NOxTech  
Sierra Club  
Southern California Edison  
Southern California Gas Company  
Representatives from other companies and other interested individuals

**ATTACHMENT D**

RESOLUTION NO. - \_\_\_\_\_

**A Resolution of the South Coast Air Quality Management District (AQMD) Governing Board Certifying the Addendum to the Final Environmental Assessment for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines.**

**A Resolution of the AQMD Governing Board amending Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines.**

**WHEREAS**, the AQMD Governing Board has determined with certainty that Proposed Amended Rule 1110.2 is considered a “project” pursuant to the terms of the California Environmental Quality Act (CEQA); and

**WHEREAS**, the AQMD has had its regulatory program certified pursuant to Public Resources Code Section 21080.5 and has conducted CEQA review pursuant to such program (AQMD Rule 110); and

**WHEREAS**, the AQMD was the lead agency and prepared the 2007 Final Environment Assessment (EA) for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (SCAQMD No. 280307JK, December 2007) for the 2008 Amendments to Rule 1110.2, which was certified on January 4, 2008; and

**WHEREAS**, it was concluded that the proposed amendments to Rule 1110.2 would not generate any new significant adverse environmental impacts or make existing significant adverse impacts identified in the 2007 Final EA Proposed Amended Rule 1110.2 worse and, therefore, has concluded that an Addendum prepared pursuant to CEQA Guidelines §16164 is the appropriate CEQA document for the proposed project; and

**WHEREAS**, as Lead Agency for Proposed Amended Rule 1110.2 under CEQA, the AQMD prepared an Addendum to the 2007 Final EA; and

**WHEREAS**, pursuant to CEQA Guidelines §15164(c), an Addendum need not be circulated for public review; and

**WHEREAS**, the AQMD Governing Board voting on Proposed Amended Rule 1110.2, has reviewed, considered the Addendum to the 2007 Final EA along with the 2007 Final EA; and

**WHEREAS**, the AQMD Governing Board finds and determines, taking into consideration the factors in §(d)(4)(D) of the Governing Board Procedures, that any modifications adopted which have been made to Proposed Amended Rule 1110.2, since notice of public hearing was published do not significantly change the meaning of the proposed rule within the meaning of the Health and Safety Code Section 40726 and do not constitute conditions described in CEQA Guidelines §15162 requiring preparation of a subsequent CEQA document; and

**WHEREAS**, the AQMD Governing Board has determined that a need exists to amend Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, for the reasons contained in the Board Letter; and

**WHEREAS**, the AQMD Governing Board obtains its authority to adopt, amend, or rescind rules and regulations from Sections 40000, 40001, 40440, 40500, 40501.3, 40506, 40510, 40510.5, 40512, 40522, 40522.5, 40523, 40702, 40725 through 40728, and 44380 of the California Health and Safety Code; and

**WHEREAS**, the AQMD Governing Board has determined that Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, as proposed to be amended, is written or displayed so that its meaning can be easily understood by the persons directly affected by it; and

**WHEREAS**, the AQMD Governing Board has determined that Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, as proposed to be amended, is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations; and

**WHEREAS**, the AQMD Governing Board has determined that Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, as proposed to be amended, does not impose the same requirements as any existing state or federal regulation, and the proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, the AQMD; and

**WHEREAS**, the AQMD Governing Board, in amending and adopting this regulation, references the following statutes which the District hereby implements, interprets, or makes specific: California Health and Safety Code Sections 40440(a) (rules to carry out the Air Quality Management Plan), 40440(c) (cost effectiveness), 41508, 41700, and Federal Clean Air Act Section 172(c)(1) (RACT); and

**WHEREAS**, the AQMD Governing Board has determined that the Final Socioeconomic Assessment approved for the 2008 amendments to Rule 1110.2 remain valid for this proposed amendment, since there are fewer engines to control and the control costs have remained relatively constant since the 2008 Socioeconomic Assessment was conducted; and

**WHEREAS**, the AQMD Governing Board has determined that the 2008 Socioeconomic Assessment for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines is still consistent with the provisions of Health and Safety Code Sections 40440.8, 40728.5 and 40920.6; and

**WHEREAS**, the AQMD Governing Board has determined that the 2008 Socioeconomic Assessment for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines is still consistent with the March 17, 1989 Board Socioeconomic Resolution for rule adoption; and

**WHEREAS**, the AQMD Governing Board has determined that Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines would have fewer costs to the affected industries than what was described in the 2008 Socioeconomic Assessment; and

**WHEREAS**, a public hearing has been properly noticed in accordance with the provisions of Health and Safety Code Section 40725; and

**WHEREAS**, the AQMD Governing Board has held a public hearing in accordance with all the provisions of law; and

**WHEREAS**, the AQMD specifies the Manager of Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of this proposed amendment is based, which are located at the South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California; and

**WHEREAS**, at the conclusion of the public hearing, the AQMD Board may make other amendments to Proposed Amended Rule 1110.2 which are justified by the evidence presented, or may decline the amendments or adoption; and

**NOW, THEREFORE, BE IT RESOLVED**, that the AQMD Governing Board does hereby certify that the Addendum to the 2007 Final EA for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines, was completed in compliance with the CEQA statutes and Guidelines; and finds that the Addendum to the 2007 Final EA along with the 2007 Final EA for Proposed Amended Rule 1110.2 were presented to the Governing Board, whose

members reviewed, considered and approved the information therein prior to acting on Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines; and finds that the Addendum to the 2007 Final EA along with the 2007 Final EA for Proposed Amended Rule 1110.2 reflect the AQMD’s independent judgment; and

**BE IT FURTHER RESOLVED**, that because no significant adverse environmental impacts were identified as a result of implementing Proposed Amended Rule 1110.2, Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Plan are not required; and

**BE IT FURTHER RESOLVED**, that because the CEQA document attached herein is an Addendum to the 2007 Final Environmental Assessment for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines, the *Attachment 1 to the Governing Board Resolution for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs) Statement of Findings, Statement of Overriding Considerations and Mitigation Monitoring Plan*, prepared for the 2008 amendments to Rule 1110.2 applies to the currently proposed amendments to Rule 1110.2 and, therefore, is attached herein and incorporated by reference; and

**BE IT FURTHER RESOLVED**, that the AQMD Governing Board directs staff to apply the funds collected from the Compliance Flexibility Fee to the AQMD’s leaf blower program and any other similar NOx reduction programs pursuant to protocols approved under District rules which staff determines, in consultation with District Counsel, will not call for the preparation of a subsequent environmental assessment pursuant to CEQA guidelines section 15162; and

**BE IT FURTHER RESOLVED**, that the AQMD Governing Board directs staff, in amending this rule, to continue its technology/rule implementation assessment efforts by working collaboratively with all interested stakeholders and other interested parties in monitoring the performance of on-going demonstration and other commercial biogas control technology projects and report back to the Stationary Source Committee periodically, beginning no later than July 1, 2013; and

**BE IT FURTHER RESOLVED**, that the AQMD Governing Board directs staff, in amending this rule, to work collaboratively with all interested stakeholders and other interested parties in monitoring the effectiveness of the missing data provisions for continuous emission monitoring systems (CEMS) on biogas-fired engines, and make appropriate changes to the rule, if necessary, no later than January 1, 2015.

**BE IT FURTHER RESOLVED**, that the AQMD Governing Board does hereby receive and file the Final Technology Assessment Report for Biogas Engines; and

**BE IT FURTHER RESOLVED**, that the AQMD Governing Board does hereby amend, pursuant to the authority granted by law, Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, as set forth in the attached and incorporated herein by this reference.

Date: \_\_\_\_\_

\_\_\_\_\_  
Clerk of the Boards

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**Attachment 1 to the Governing Board Resolution for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs)**

**Statement of Findings, Statement of Overriding Considerations and Mitigation Monitoring Plan**

**December 2007**

**SCAQMD No. 280307JK**

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**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
GOVERNING BOARD**

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## **INTRODUCTION**

Proposed amended Rule (PAR) 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs), is a “project” as defined by the California Environmental Quality Act (CEQA) (California Public Resources Code §§21000 et seq.). The South Coast Air Quality Management District (SCAQMD) is the lead agency for the proposed project and, therefore, has prepared an Environmental Assessment (EA) pursuant to CEQA Guidelines §15252 and SCAQMD Rule 110. The purpose of the EA is to describe the proposed project and to identify, analyze, and evaluate any potentially significant adverse environmental impacts that may result from adopting and implementing the proposed project. The Draft EA was circulated to the public for a 45-day review and comment period from November 2, 2007, to December 18, 2007. The SCAQMD received one comment letter during the 45-day public review and comment period. Responses were prepared for the comments received during the comment period.

Note that some modifications and updates have been made to the proposed amended regulation since the release of the Draft EA based on input from the regulated industry and other parties to the rule development staff. Thus, some changes were necessary to make the revised Draft EA into a Final EA. However, these modifications and updates were evaluated by staff and it was concluded that they do not constitute “significant new information”<sup>1</sup> and, therefore, do not require recirculation of the document pursuant to CEQA Guidelines §15088.5.

## **SUMMARY OF THE PROPOSED PROJECT**

PAR 1110.2 partially implements the 2007 AQMP Control Measure MSC-01 – Facility Modernization, which requires facilities not participating in the NOx Regional Clean Air Incentives Market (RECLAIM) Program to retrofit or replace existing equipment at the end of a predetermined life span to achieve NOx emissions equivalent to best available control technology (BACT). In addition to achieving NOx emission reductions equivalent to BACT, another objective of PAR 1110.2 is to achieve further VOC and CO emission reductions based on the cleanest available technologies. PAR 1110.2 would also increase engine compliance through improved monitoring, recordkeeping and reporting. PAR 1110.2 would also implement SB 1298 distributed generation (DG) emission standards for new electrical generating engines. Finally, a major objective of PAR 1110.2 is to address and correct issues also identified by EPA relative to the existing version of Rule 1110.2, so it can be approved for incorporation into the SIP.

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<sup>1</sup> Pursuant to CEQA Guidelines §15088.5, “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (a) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (b) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (c) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (d) The draft EA was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Staff proposes the following amendments to Rule 1110.2:

- Strengthen source testing requirements, add an inspection and monitoring plan, install air-to-fuel ratio controllers, and additional CEMS requirements for groups of engines over 1,500 horsepower to improve compliance. An exception from the quarterly CO monitoring is included for diesel and other lean-burn engines that are subject or Regulation XX or have a NO<sub>x</sub> CEMs and that are not subject to a CO limit more stringent than 2000 ppm. The engines would still be subject to the I&M plans
- Eliminate the efficiency correction of the current NO<sub>x</sub> and VOC emission limits, except for biogas engines until 2012 where operators limit natural gas usage to 10 percent of total fuel use and test for actual engine efficiency. Eliminate the efficiency correction of the current NO<sub>x</sub> and VOC emission limits for biogas engines after 2012. The calculation of the monthly facility biogas use percentage may exclude natural gas fired during: any electrical outage at the facility; Stage 2 or higher electrical emergencies called by the California Independent System Operator Corporation; and when precipitation causes a sewage treatment plant to exceed its design capacity. The Executive Officer may approve the burning of more than ten percent natural gas in a land fill or digester gas-fired engine, when it is necessary, if the engine required more natural gas in order for waste heat recovery boiler to provide enough thermal energy to operate a sewage treatment plant, and other boilers at the facility are unable to provide the necessary thermal energy.
- Reduce emissions consistent with the 2007 AQMP, new NO<sub>x</sub> and VOC emission limits equivalent to current BACT and a reduction of the CO limit from 2000 ppm to 250 ppm. These limits will phase in from 2010 to 2012.
- Require new electrical generating engines to partially comply with CARB DG standards.
- Clarify the exemption status of non-road engines, and remove the emission standard requirements for portable engines.
- Remove exemptions for ski area engines and engines outside South Coast and Salton Sea Air Basins
- Add new exemptions for startups, overhauls, and initial commissioning of engines.
- Include in the resolution direction for staff to not submit the 2012 biogas limits as part of the SIP submittal, conduct a technology assessment to assure that cost-effective technology is available for biogas engines to comply with the proposed biogas limits by 2010.

**SIGNIFICANT ADVERSE IMPACTS WHICH CAN BE REDUCED BELOW A SIGNIFICANT LEVEL OR WERE CONCLUDED TO BE INSIGNIFICANT**

The EA identified health risk from diesel emergency engine exhaust particulate and global warming as potentially significant adverse environmental impacts that can be reduced to a level determined not to be significant. There were two environmental topics, energy and solid/hazardous waste that were identified as potentially significant in the NOP/IS, but were determined not to be significant in the EA.

### **Health Risk from Diesel Exhaust Particulate**

Health risk is evaluated on a localized level by evaluating the adverse impacts of a facility on the near-by community. The proposed project would generate potential health risks from diesel truck trips associated with ammonia, LNG and diesel fuel. Facility operators who replace biogas ICEs with alternative technologies instead of complying with PAR 1110.2 may need diesel emergency engines to make up energy losses due to efficiency differences between the biogas ICEs and alternative technologies. Non-biogas facility operators who replace ICEs with electric motors may need diesel emergency engines to provide energy equivalent to the non-biogas ICE during emergencies.

The worst-case carcinogenic health risk could occur at a facility that had both biogas and non-biogas emergency engines. However, the carcinogenic health risk at any facility with both biogas and non-biogas emergency engines is expected to be below the sum of the health risk of the biogas facility with the largest carcinogenic risk and the non-biogas facility with the largest carcinogenic health risk (3.4 in one million + 18 in one million = 21.4 in one million), which is greater than the significance threshold of ten in a million ( $1.0 \times 10^{-5}$ ). Non-carcinogenic health risk was not determined to be significant. Therefore, PAR 1110.2 would be significant for carcinogenic health risk from diesel particulate emissions.

To further reduce diesel PM emissions diesel particulate filters (DPFs) will be required for any emergency diesel backup generators used at non-biogas facilities where operators install electric motors and the carcinogenic health risk exceeds 10 in one million ( $1 \times 10^{-5}$ ). DPFs allow exhaust gases to pass through the filter medium, but trap diesel PM. Depending on engine baseline emissions and emission test method or duty cycle, DPFs can achieve a PM emission reduction of greater than 85 percent. DPFs installed on diesel backup generators are, however, expected to reduce significant adverse cancer risks to less than significant. The maximum cancer risk at the largest non-biogas facility can be reduced from approximately 18 in one million ( $1.8 \times 10^{-5}$ ) to approximately 4.5 in one million ( $4.5 \times 10^{-6}$ ), which is less than the SCAQMD's cancer risk significance threshold of 10 in one million ( $1.0 \times 10^{-5}$ ). Even if the carcinogenic health risk from both the biogas and non-biogas facilities were added together (21.4 in one million or  $2.14 \times 10^{-5}$ ), DPF would reduce the carcinogenic health risk to less than significant ( $2.14 \times 10^{-5} \times (1-0.85) = 3.21$  in one million). Many engines can also limit their testing to be less than 30 hours per year to reduce carcinogenic health risk to below 10 in one million.

### **Global Warming**

Preliminary evaluation of the proposed project indicated that it could result in a net increase in CO<sub>2</sub> emissions (a greenhouse gas), primarily from construction activities to install control devices, new engines, etc. However, SCAQMD staff assumed for the CEQA analysis that, for some categories of ICEs, it may be less costly to install electric motors than comply with PAR 1110.2. SCAQMD staff identified 225 ICEs where it would be less costly to install electric motors. To provide a conservative analysis, staff assumed that operators of only 75 percent of these engines, 169 engines, would install electric motors. Electric motors are estimated to have a lifespan of 10 years. For the purposes of addressing the GHG impacts of PAR 1110.2, the overall impacts of CO<sub>2</sub> emissions from the project were estimated and evaluated from initial implementation of the proposed project in 2009 through 2019 (i.e.,

over the lifespan of the electric motors). While the analysis was only completed over the lifespan of the electric motor, it is expected that the reduction would continue, since facility operators would be expected to replace electric motors with another electric motor once the original is replaced. The analysis also took into account CO<sub>2</sub> emission increases from utilities to produce electricity to run the electric motors.

It is possible that fewer than 169 non-biogas engines could be replaced with electric motors, but, given the lower costs of installing and operating electric motors, it is likely that at least 15 non-biogas engines or more would be replaced with electric motors. As a result, the analysis only took CO<sub>2</sub> emission reduction credit for the replacement of 15 ICES with electric motors. The analysis showed that the CO<sub>2</sub> emission reductions from PAR 1110.2 with replacing ICES with electric motors were greater than the CO<sub>2</sub> emission increases expected from PAR 1110.2 without replacing ICES with electric motors. Therefore, PAR 1110.2 is assumed to be less than significant for global warming.

## **Energy**

### ***Total Energy Impacts***

Under the worst-case energy scenario (replacing digester gas engines with microturbines and landfill gas engines with LNG plants), PAR 1110.2 would reduce natural gas used by at least 181,719 MMBtu per year, which includes the voluntary replacement of existing non-biogas engines with electric motors where it costs less than complying with PAR 1110.2. The total electricity production loss by the worst-case biogas scenario (replacing digester gas engines with microturbines and landfill gas engines with LNG plants) would be 576,527 MW-hours per year which is less than one percent of 120,194 GW-hours per year available in Southern California. The maximum amount of diesel used in worst-case construction and operations would be 1,871 gallons of diesel per day, which is less than one percent of the 10 million gallons consumed per day in California, and therefore is less than significant.

### ***Renewable Energy Impacts***

A technical assessment will be completed in 2010, which will verify that PAR 1110.2 would not cause biogas facility operators to replace existing ICES with continuous flaring. If the technology assessment shows potential for flaring or that feasible control options for biogas engines are not available, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. Because of the technology assessment under PAR 1110.2, SCAQMD staff believes that facilities operators will either use add-on control or replace ICES with alternative technologies that would either generate electricity or LNG; there would be only adverse impacts to renewable energy supplies from efficiency losses between the existing ICES and the ICES with add-on control or ICE replacement technologies. The largest electrical loss from renewable energy sources because of differences in efficiency between alternative technologies and the existing ICES would be 101,013 MW-hours per year for the microturbines compliance option.

There may be adverse energy impacts in an individual government program, but any energy losses other than from efficiency losses from one program may be made up in another program. For example, if a landfill gas facility operator chooses to replace an existing

biogas ICEs with a LNG facility, not only would there be a loss of electricity generation, but the LNG facility would need energy from the grid to operate. However, the landfill gas would not be wasted, but treated and sold as LNG, which is a renewable fuel. While this might affect the California's Renewables Portfolio Standard (RPS), which focuses only on electricity, it would assist renewable fuel/biomass goals under Governor Schwarzenegger's Executive Order S-06-06. Therefore, while

### **Solid/Hazardous Waste**

The NOP/IS stated that solid/hazardous waste might be significantly adversely impacted by PAR 1110.2. Adverse solid/hazardous waste impacts are associated with the replacement of ICEs and the disposal of catalysts. The replacement of ICEs would occur once during construction. The replacement of catalyst would occur both during construction and operation. An analysis was completed that compared the capacities of existing solid and hazardous waste landfills and it was determined that the adverse solid/hazardous waste impacts associated with PAR 1110.2 would not be significant.

### **SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE REDUCED BELOW A SIGNIFICANT LEVEL**

The Initial Study identified air quality, energy, hazards and hazardous materials, and solid/hazardous waste as areas that may be adversely affected by the proposed project. During the public comment period on the Notice of Preparation and Initial Study (NOP/IS) for the proposed project, April 26, 2007 to May 25, 2007, SCAQMD staff received comments suggesting that the proposed project could create significant adverse aesthetic impacts. Potential adverse impacts to these five environmental areas were further analyzed in the Draft EA. Potential adverse energy and solid/hazardous waste impacts were determined to be less than significant.

It was assumed that operators of biogas systems will comply with PAR 1110.2 by controlling emissions from ICEs with SCR or NOxTech systems or replace the ICE with an alternative technology that would not be regulated by PAR 1110.2, such as, boilers, gas turbines, microturbines, fuel cells or biogas to LNG facilities. Emission reductions from ICEs controlled by SCR or NOxTech systems were estimated based on PAR 1110.2 limits. The emission reductions anticipated for PAR 1110.2 are based on the assumption that operators of biogas facilities can comply with PAR 1110.2 by installing control equipment onto their equipment. However, based on comments received by the regulated industry, operators may replace biogas engines with alternative technologies and, thus, would no longer be subject to PAR 1110.2. If biogas operators choose to replace ICEs with alternative technologies (gas turbines, microturbines, LNG plants, etc.), the alternative technologies would be subject to other regulatory requirements such as Regulation XIII. The follow is a description of each replacement technology.

To account for the possibility that affected operators may install alternative technologies; staff has calculated the potential emission reduction effects if all affected biogas engines are replaced with alternative technologies. To address concerns of commenters about flaring and biogas compliance options, which have not been verified, SCAQMD staff has committed to a technology assessment in 2010. If the technology assessment shows the

potential for flaring, then staff will return to the Governing Board with a proposal addressing any new significant adverse impacts. Facility operators who replace ICEs with fuel cells would not generate any appreciable emissions, so emissions would essentially be zero. The analysis assumes that facility operators who replace ICEs with biogas to LNG facilities would generate emissions from boilers used to produce heat for the process and would use electric motors, which would be powered by electricity from the grid.

The EA analyzed potential adverse impacts from five different biogas compliance options: NO<sub>x</sub>, VOC and CO controls added to biogas ICEs; biogas ICEs replaced with gas turbines; biogas ICEs replaced with microturbines; digester gas ICEs replaced with gas turbines and landfill gas ICEs replaced with LNG plants; digester gas ICEs replaced with microturbines and landfill gas ICEs replaced with LNG plants.

The analysis assumes that facility operators who replace ICEs with biogas to LNG facilities would generate emissions from boilers used to produce heat for the process and would use electric motors, which would be powered by electricity from the grid. LNG plants require substantial area because of the size and number of components needed to collect, scrub and cool biogas into LNG. Not all biogas facilities have enough space to support an LNG plant. The analysis of the effects of replacing ICEs with LNG plants assumes that only landfill gas facilities have enough area to allow installation of an LNG plant.

### **Aesthetics**

Commenters stated that facility operators might replace existing diesel engines with diesel engine alternatives such as, gas turbines, microturbines, fuel cells, electric motors, boilers, or biogas to liquefied natural gas (LNG) plants. Physical modifications that may be necessary to comply with alternatives to complying with PAR 1110.2 might significantly alter the aesthetics of an existing facility. Therefore, PAR 1110.2 was determined to be significant for adverse aesthetic impacts.

### **Air Quality**

Since construction and operational emissions would occur concurrently, the emissions from both activities were evaluated together. The resulting emissions were compared to SCAQMD operational criteria pollutant thresholds. The worst-case criteria emissions would occur if all biogas facility operators chose to replace ICEs with gas turbines. In this scenario, PAR 1110.2 would reduce 4,311 pounds of NO<sub>x</sub> per day, 46,868 pounds of CO per day, 1,995 pounds of VOC per day and 13 pounds of SO<sub>x</sub> per day. PM<sub>10</sub> would increase by 142 pounds per day and PM<sub>2.5</sub> would increase by 142 pounds per day. The PM<sub>10</sub> increase would be below the significance threshold of 150 pounds per day. The PM<sub>2.5</sub> emissions would be greater than the significance threshold of 55 pounds per day. Therefore, PAR 1110.2 would be significant for PM<sub>2.5</sub> operational emissions.

### **Hazards and Hazardous Materials**

SCR systems require either urea or ammonia to control NO<sub>x</sub>. Use of urea would not result in offsite adverse impacts because it is not a hazardous material. Because of the hazards associated with anhydrous ammonia, an acutely hazardous material, SCAQMD policy precludes its use as a means of reducing NO<sub>x</sub> emissions. To further reduce hazards



associated with ammonia, a permit condition that limits the aqueous ammonia concentration to 19 percent or less is typically required. Since 20 percent aqueous ammonia is evaluated by RMPComp (20 percent is the lowest concentration available in RMPComp), adverse impacts from aqueous ammonia were evaluated based on the 20 percent aqueous ammonia in the EA. The NOP/IS determined that adverse impacts from transport of aqueous ammonia would be less than significant, so transport of ammonia was not evaluated further in the Draft EA. SCAQMD staff estimated that the largest aqueous ammonia tank would be 5,000 gallons. Storage and use of aqueous ammonia, however, would generate potentially significant adverse impacts and, therefore, were evaluated in the Draft EA. The toxic endpoint for a 5,000 gallon aqueous ammonia tank would be 0.1 mile. Based on a survey of biogas facilities, some facilities have receptors within 0.1 mile of the existing ICEs. Since it is assumed that aqueous ammonia tanks for SCR system would need to be relatively near to the existing ICEs, it is assumed that the toxic endpoint for aqueous ammonia from a catastrophic failure of the storage tank would significantly adversely affect the receptors within 0.1 mile of the ICEs. Therefore, PAR 1110.2 has the potential to generate significant adverse hazardous impacts in the event of an accidental release of aqueous ammonia.

Installation of biogas to LNG plants instead of complying with PAR 1110.2 would include LNG storage tanks. Based on the SCAQMD's survey of facilities, and design of the LNG facility at the Bowerman Landfill, the largest LNG tank was estimated to be 71,000 gallons. The overpressure from a catastrophic release of 71,000 gallons of LNG with a berm was estimated to be 0.2 mile. Based on a survey of biogas facilities, some facilities have receptors with 0.1 miles of the existing ICEs. Therefore, PAR 1110.2 has the potential to generate significant adverse hazardous impacts in the event of a catastrophic failure of an LNG storage tank.

Four accidental release scenarios were identified for the transport of LNG: release of LNG into a pool that evaporates and disperses without ignition; the ignition of a flammable cloud; a boiling liquid expanding vapor explosion (BLEVE) occurs; or the tank ruptures, rockets away and ignites. The worst-case endpoint from these scenarios is 0.3 mile from a vapor cloud fire, BLEVE or where a rocketing tank would land. Assuming that these accidents would occur near receptors, PAR 1110.2 has the potential to generate significant adverse hazard impacts in the event of an accidental release of LNG during transport.

## **FINDINGS**

Public Resources Code §21081 and CEQA Guidelines §15091(a) state that no public agency shall approve or carry out a project for which a CEQA document has been completed which identifies one or more significant adverse environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. Additionally, the findings must be supported by substantial evidence in the record (CEQA Guidelines §15091(b)). As identified in the Final EA and summarized above, the proposed project has the potential to create significant adverse aesthetics, construction air quality, and hazard and hazardous materials impacts. The SCAQMD Governing Board, therefore, makes the following findings regarding the proposed project. The findings are supported by substantial evidence in the record as explained in each finding. This Statement of Findings

will be included in the record of project approval and will also be noted in the Notice of Decision.

### **1. Potential aesthetic adverse impacts cannot be mitigated to insignificance.**

Finding and Explanation: Significant adverse aesthetic impacts are expected as a result of complying with PAR 1110.2 at biogas facilities. No specific mitigation measures were identified that could reduce significant adverse aesthetic impacts to less than significant. It is expected that facility operators would place control technology or ICE alternatives away from property boundaries. However, space issues and the location of utilities, location and quality of the biogas source, and piping may dictate the placement of equipment. Equipment may be masked by perimeter walls or landscape vegetation; although, fire prevention and safety issues would take precedence over aesthetic concerns. As a result, there is no guarantee that landscape vegetation would be available as a means of reducing aesthetics impacts.

Since the location and type of control equipment or ICE replacement is unknown for any specific biogas facility and the effectiveness of perimeter walls and landscaping to minimize aesthetics impacts is unknown, it is assumed that aesthetics impacts cannot be mitigated to less than significant.

The Governing Board finds that no feasible mitigation measures have been identified. CEQA Guidelines §15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

### **2. Potential PM2.5 emissions from the gas turbine compliance option cannot be mitigated to insignificance.**

Finding and Explanation: PM2.5 emissions under the gas turbine compliance option were concluded to be significant in certain years. Secondary PM2.5 emissions under this compliance scenario are generated from the following sources: emergency diesel backup generators during periodic testing, diesel trucks transporting materials, e.g., catalyst, activated carbon, etc., to and from affected facilities, power plant emissions, etc. would occur. Based on the gas turbine biogas compliance option, PAR 1110.2 has the potential to emit 142 pounds of PM2.5 per day in some future years.

New gas turbines installed as a compliance option instead of complying with PAR 1110.2 would likely be subject to Rule 1303 or Rule 2005 BACT requirements. No add-on control technology or alternatives have been identified to reduce PM2.5 emissions from the gas turbine compliance option.

The Governing Board finds that no feasible mitigation measures have been identified to reduce significant adverse PM2.5 impacts under the gas turbine compliance option. CEQA Guidelines §15364 defines "feasible" as "capable of being accomplished in a successful

manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

**3. Potential adverse hazard impacts from an accidental release of ammonia during storage and LNG during transport and storage that cannot be mitigated to insignificance.**

Finding and Explanation: In the event of a catastrophic release of aqueous ammonia from ammonia storage tanks, it was estimated that there could be exposure to concentrations of ammonia above the ERPG 2 level of 150 ppm within 0.1 mile of the storage tank. Due to the size and locations of affected facilities sensitive receptors are expected to be within 0.1 mile of the storage tank. Therefore PAR 1110.2 would be significant for accidental release from ammonia storage.

Under the alternative compliance option where the owner of an affected biogas engine replaces the engine with a biogas-to-LNG facility, significant adverse hazard impacts could occur under the following scenarios. The one psi overpressure from the cataclysmic destruction of the LNG storage tank is expected to extend 0.2 mile from the LNG storage tank. Due to the size and locations of affected facilities sensitive receptors are expected to be within 0.1 mile of the storage tank. Therefore PAR 1110.2 would be significant for accidental release from an on-site LNG storage tank. During transportation of LNG, it was estimated that adverse impacts from various releases would extend 0.3 mile. It is expected that sensitive receptors could be within 0.3 mile of roadway used by LNG trucks associated with PAR 1110.2. Therefore, PAR 1110.2 has the potential to generate significant hazard impacts associated with an accidental release of LNG during transport.

SCAQMD policy relative to air pollution control technologies requires the use of aqueous ammonia instead of anhydrous ammonia reduces potential adverse impacts in the event of an accidental release of ammonia used for SCR units. The use of 19 percent aqueous ammonia further reduces adverse impacts from in the event of an accidental release of ammonia.

Secondary containment (e.g. berms), valves that fail shut, emergency release valves and barriers around ammonia or LNG storage tanks are design measures that are used to prevent the physical damage to storage tanks or limit the release of aqueous ammonia or LNG from storage tanks are typically required by local fire departments. Integrity testing of aqueous ammonia and LNG storage tanks assists in preventing failure from structural problems. Further, as part of the proposed project, SCAQMD staff will require that affected facility operators construct a containment system to be used during ammonia off-loading and LNG loading operations.

However, no additional mitigation measures beyond those identified above were identified that would reduce the hazard and hazardous material impacts from ammonia or LNG to less than significant. Therefore, the remaining hazards and hazardous material impacts from exposure to the ERPG 2 level of 150 ppm for ammonia and the one psi overpressure from the cataclysmic destruction of the LNG storage tank are considered to be significant.

The Governing Board finds that no additional feasible mitigation measures beyond those identified in the EA have been identified that can reduce adverse hazards and hazardous material impacts to less than significant. CEQA Guidelines §15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

**4. Feasible Alternatives to the Proposed Project do not reduce adverse aesthetic, air quality and hazards, and hazardous material impacts to insignificance.**

Finding and Explanation: The Governing Board finds further that in addition to the No Project Alternative, the Final EA considered alternatives pursuant to CEQA Guidelines §15126.6. Of all the alternatives considered, only Alternative C (Enhanced Enforcement) would reduce to insignificant levels the significant adverse aesthetic, air quality, and hazard and hazardous material impacts identified for the proposed project. Installation of CEMs, additional monitoring, etc., are not expected to change the visual character of the facility or surroundings and, therefore, would not be expected to generate significant adverse aesthetic impacts. Additional compliance requirements would not generate significant adverse construction or operational air quality impacts. Air toxics would be generated from source testing vehicle trips, but health risk from a single trip every other year would be negligible. Because Alternative C does not impose further emission control requirements, no facility operators would implement emission compliance options that could generate significant hazards/hazardous material impacts, because hazards would not be generated from increased monitoring and source testing. By not requiring any additional control equipment, facility operators are not expected to replace ICEs with ICE alternatives. The ICE alternatives were determined to be the source of adverse aesthetic, air quality and hazards and hazardous material impacts. However, while Alternative C would not generate significant adverse impacts compared to the proposed project, it would also not achieve most of the project objectives such as implementing the 2007 AQMP Control Measure MCS-01 – Facility Modernization; partially implementing SB 1298; and achieving further NO<sub>x</sub>, VOC, and PM emission reductions from affected engines.

Alternative B would extend and increase the low-use exception to non-biogas engines and extend the 15 minute averaging time during compliance testing to one hour. Impacts from implementing Alternative B would generally be similar to PAR 1110.2 because the greatest impacts occur from the various compliance options for biogas engines. Compliance options are essentially the same for both Alternative B and PAR 1110.2. Alternative B may generate lower construction emissions overall compared to PAR 1110.2, but because major construction activities are anticipated to occur at biogas facilities the maximum daily construction emissions may not be substantially different from those identified for PAR 1110.2. CO<sub>2</sub> emission reductions would be similar to CO<sub>2</sub> emission reductions identified for PAR 1110.2 because it is expected that replacing non-biogas ICEs with electric motors will be a less costly compliance option for the same categories of ICEs affected by both PAR 1110.2 and Alternative B. Aesthetic and hazards/hazardous material impacts are expected to be similar to PAR 1110.2 and, therefore, significant.

Alternative D is expected to generate significant adverse environmental impacts similar to those identified for PAR 1110.2. Alternative D may incrementally increase adverse environmental impacts because larger or additional control may be required to meet the lower CO compliance concentration limits. CO<sub>2</sub> emission reductions would occur through the mandatory replacement of non-biogas engines with electric motors for categories for categories of engines where this compliance option is less costly than complying with the emission control requirements. While in practice Alternative D could generate greater adverse environmental impacts, the assumptions applied to PAR 1110.2 would also apply to Alternative D because these assumptions provide the most conservative analysis possible. Therefore, for this analysis the adverse environmental impacts from PAR 1110.2 and Alternative D are equivalent. Alternative D would be expected to create significant adverse aesthetics, air quality, and hazards/hazardous waste.

Although Alternative A-No Project Alternative, would not generate any of the adverse impacts identified for the proposed project, it would also not achieve any of the project objectives. An important objective of the proposed project is to improve an enhance compliance with the rule requirements. Under Alternative A it is possible that violations of Rule 1110.2 could continue to occur, albeit at a lower level than is currently the case because the SCAQMD is aware of compliance issues. Finally, Alternative A would not address SIP approvability issues identified by EPA.

No additional feasible mitigation measures or project alternatives, other than those already included in the Final EA, have been identified that can further mitigate the potentially significant project-specific impacts on air quality.

The SCAQMD finds that the proposed project achieves the best balance between emission reductions and the adverse aesthetic, air quality, and hazardous and hazardous material impacts due to construction and operation activities while meeting the objectives of the project. The SCAQMD further finds that all of the findings presented in this “Statement of Findings” are supported by substantial evidence in the record.

The record of approval for this project may be found in the SCAQMD’s Clerk of the Board’s Office located at SCAQMD Headquarters in Diamond Bar, California.

## **STATEMENT OF OVERRIDING CONSIDERATIONS**

If significant adverse impacts of a proposed project remain after incorporating mitigation measures, or no measures or alternatives to mitigate the adverse impacts to less than significant levels are identified, the lead agency must make a determination that the benefits of the project outweigh the unavoidable adverse environmental effects if it is to approve the project. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project (CEQA Guidelines §15093(a)). If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable” (CEQA Guidelines §15093(a)). Accordingly, a Statement of Overriding Considerations regarding potentially

significant adverse impacts resulting from the proposed project has been prepared. This Statement of Overriding Considerations is included as part of the record of the project approval for the proposed project. Pursuant to CEQA Guidelines §15093(c), the Statement of Overriding Considerations will also be noted in the Notice of Decision for the proposed project.

Despite the inability to incorporate changes into the project that will mitigate potentially significant adverse impacts to a level of insignificance, the SCAQMD's Governing Board finds that the following benefits and considerations outweigh the significant unavoidable adverse environmental impacts:

1. The analysis of potential adverse environmental impacts incorporates a “worst-case” approach. This entails the premise that whenever the analysis requires that assumptions be made, those assumptions that result in the greatest adverse impacts are typically chosen. This method likely overestimates the actual adverse aesthetic, air quality, and hazards and hazardous material impacts resulting from the proposed project.
2. The proposed project implements, in part, AQMP control measure MSC-01. The long-term effect of PAR 1110.2, other SCAQMD rules, and AQMP control measures is the reduction of criteria emissions district-wide, contributing to attaining and maintaining the state and federal ambient air quality standards with a margin of safety. Beginning in 2008, PAR 1110.2 would reduce NO<sub>x</sub> emissions by 37 tons per year (204 pounds per day) CO emissions by 69 tons per year (379 pounds per day) and VOC emission by six tons per year (35 pounds per day). At full implementation, the long-term effect of the proposed amendments is a permanent reduction of NO<sub>x</sub> emissions by 4,335 tons per year (791 pounds per day), CO emissions by 38,845 tons per year (7,089 pounds per day) and VOC emission by 1,372 tons per year (250 pounds per day).
3. Although significant health risk impacts from diesel exhaust particulate emissions was identified, a mitigation measure was identified to reduce emissions impacts to a level of insignificance.
4. The proposed project and alternatives do not prescribe the means of controlling NO<sub>x</sub>, VOC and CO emissions. Facility operators may choose technologies that would not generate significant adverse aesthetic, air quality, or hazards and hazardous material impacts. For example, if biogas facility operators replaced their existing ICEs with microturbines or fuel cells, then there would not be any aesthetic, air quality, or hazards and hazardous material impacts.
5. The proposed project includes a technology assessment in 2010. The results of the technology assessment may result in identifying control technologies that would not generate significant adverse aesthetic, air quality, or hazards and hazardous material impacts.
6. The proposed project is expected to result in a net reduction of CO<sub>2</sub> emissions based on the expectation that it will be more cost effective for operators of some types of non-

biogas engines to replace their engines with electric motors. As a worst-case assumption, PAR 1110.2 is expected to result in no net increase in CO2 emissions.

7. One of the objectives of PAR 1110.2 is to address the four issues identified by EPA that were cause for disapproval of Rule 1110.2, which means it cannot be incorporated into the State Implementation Plan. Adopting PAR 1110.2 would correct the four issues identified by EPA.

The SCAQMD's Governing Board finds that the above-described considerations outweigh the unavoidable significant effects to the environment as a result of the proposed project.

## **MITIGATION MONITORING PLAN**

CEQA requires an agency to prepare a plan for reporting and monitoring compliance with the implementation of measures to mitigate significant adverse environmental impacts. Mitigation monitoring requirements are included in CEQA Guidelines §15097 and Public Resources Code §21081.6, which specifically state:

When making findings as required by subdivision (a) of Public Resources Code §21081 or when adopting a negative declaration pursuant to paragraph (2) of subdivision (c) of Public Resources Code §21080, the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment (Public Resources Code §21081.6). The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of an agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

The provisions of CEQA Guidelines §15097 and Public Resources Code §21081.6 are triggered when the lead agency certifies a CEQA document in which mitigation measures, changes, or alterations have been required or incorporated into the project to avoid or lessen the significance of adverse impacts identified in the CEQA document. Public Resources Code §21081.6 leaves the task of designing a reporting or monitoring plan to individual public agencies.

To fulfill the requirements of CEQA Guidelines §15097 and Public Resources Code §21081.6, the SCAQMD must develop a plan to monitor project compliance with those mitigation measures adopted as conditions of approval of the Final EA for the PAR 1110.2. The following subsections identify the specific mitigation measures identified in the Final EA and the public agency responsible for monitoring implementation of each mitigation measure.

## **Air Quality Impact**

**IMPACT SUMMARY OF MITIGATION MEASURES A-1:** If a facility operator chooses to replace ICEs with alternative technologies, diesel emergency engines may be

required as emergency backup engines in the event of an emergency. The analysis concluded that emissions from emergency engine testing could generate significant adverse cancer risk impacts. In the air quality analysis, it was determined that diesel particulate filters would reduce the carcinogenic health risks associated with diesel particulate emissions from the emergency engines to less than significant.

#### **MITIGATION MEASURES:**

##### **Diesel Emergency Engines**

A-1 Require particulate filters for any diesel emergency engine installed that generates a carcinogenic health risk greater than 10 in one million as a result of replacing existing ICEs at a facility as part of an alternative method of complying with PAR 1110.2.

**IMPLEMENTING PARTIES:** The SCAQMD's Governing Board finds that implementing the mitigation measures A-1 is the responsibility of the owner, operator, or agent of each affected facility who submits a permit application for emergency engines as a result of replacing existing ICEs to avoid compliance with the proposed project.

**MONITORING AGENCY:** The SCAQMD's Governing Board finds that through its discretionary authority to issue and enforce permits for this project, the SCAQMD will ensure compliance with mitigation measures A-1.

#### **Hazard and Hazardous Material Impact**

**IMPACT SUMMARY OF MITIGATION MEASURES H-1:** Facility operators who install ammonia or LNG storage tanks may generate a significant impact off-site in the event of an accidental release. Secondary containment of ammonia and LNG storage tanks are required by local fire departments. SCAQMD staff proposes that affected facilities construct a secondary containment system to be used during off-loading of ammonia and loading of LNG to further reduce off-site exposures in the event of an accidental release. No other mitigation to reduce the adverse impacts from off-site because of an accidental release of LNG or ammonia to less than significant was identified.

#### **MITIGATION MEASURES:**

##### **Diesel Emergency Engines**

H-1 Require secondary containment to be used during ammonia off-loading operations and LNG loading operations for any facility that has the potential to generate an off-site significant adverse impact in the event of an accidental release from ammonia or LNG storage tanks.

**IMPLEMENTING PARTIES:** The SCAQMD's Governing Board finds that implementing the mitigation measures H-1 is the responsibility of the owner, operator, or agent of each affected facility who submits a permit application for ammonia or LNG



storage in connection with an alternative means of complying with the proposed project where it can be shown that the facility has the potential to generate significant adverse off-site hazard impacts because of an accidental release.

**MONITORING AGENCY:** The SCAQMD's Governing Board finds that through its discretionary authority to issue and enforce permits for this project, the SCAQMD will ensure compliance with mitigation measures H-1.

## CONCLUSION

Based on a "worst-case" analysis, the potential adverse aesthetic, air quality, hazard and hazardous materials impacts from the adoption and implementation of PAR 1110.2 are considered significant and unavoidable. Construction of ICE alternatives may adversely impact the visual character of the area around affected facilities. Facility operators who choose to replace existing biogas ICES with gas turbines as an alternative to complying with the requirements of PAR 1110.2 may generate PM<sub>2.5</sub> emissions that exceed the applicable regional significance threshold. Facility operators who replace existing ICES may require diesel emergency engines. Diesel particulate filters were identified as a feasible mitigation measure that would reduce health risk from diesel emergency engine exhaust to less than significant. Facility operators who install ammonia or LNG tanks in connection with alternative compliance options have the potential to generate significant adverse hazard impacts in the event of an accidental release of either material. In addition to secondary containment features require by local fire departments for storage tanks, secondary containment around loading and off-loading operations would reduce adverse impacts, but would not reduce them to insignificance.

It is likely that existing SCAQMD Rule 1470 would already require diesel emergency back-up engines to be retrofitted with particulate filters or meet very low PM emission requirements. However, for any diesel emergency back-up engines that are installed as a result of adopting and implementing PAR 1110.2 and that may not be subject to Rule 1470, diesel particulate filters will be required to ensure that the engines do not generate significant adverse carcinogenic health risks.

No other feasible mitigation measures or project alternatives have been identified that would further reduce aesthetic, air quality, and hazards and hazardous material impacts to less than significant levels, while still achieving the overall objectives of the project.

(Adopted August 3, 1990)(Amended September 7, 1990)(Amended August 12, 1994)  
(Amended December 9, 1994)(Amended November 14, 1997)  
(Amended June 3, 2005)(Amended February 1, 2008)(Amended July 9, 2010)  
(September 7, 2012)

**Proposed Amended RULE 1110.2 EMISSIONS FROM GASEOUS- AND LIQUID-  
FUELED ENGINES**

(a) Purpose

The purpose of Rule 1110.2 is to reduce Oxides of Nitrogen (NO<sub>x</sub>), Volatile Organic Compounds (VOCs), and Carbon Monoxide (CO) from engines.

(b) Applicability

All stationary and portable engines over 50 rated brake horsepower (bhp) are subject to this rule.

(c) Definitions

For the purpose of this rule, the following definitions shall apply:

(1) AGRICULTURAL STATIONARY ENGINE is a non-portable engine used for the growing and harvesting of crops or the raising of fowl or animals for the primary purpose of making a profit, providing a livelihood, or conducting agricultural research or instruction by an educational institution. An engine used for the processing or distribution of crops or fowl or animals is not an agricultural engine.

(2) APPROVED EMISSION CONTROL PLAN is a control plan, submitted on or before December 31, 1992, and approved by the Executive Officer prior to November 14, 1997, that was required by subdivision (d) of this rule as amended September 7, 1990.

~~(3) BIOGAS CLEANUP SYSTEM is a system designed to remove siloxanes and other contaminants from raw landfill or digester gas (biogas). It is used for the protection of biogas engines and post-combustion (oxidation and selective catalytic reduction) catalysts.~~

(343) CERTIFIED SPARK-IGNITION ENGINES mean engines certified by California Air Resources Board (CARB) to meet emission standards in accordance with Title 13, Chapter 9, Article 4.5 of the California Code of Regulations (CCR).

- (~~454~~) EMERGENCY STANDBY ENGINE is an engine which operates as a temporary replacement for primary mechanical or electrical power during periods of fuel or energy shortage or while the primary power supply is under repair.
- (~~565~~) ENGINE is any spark- or compression-ignited internal combustion engine, including engines used for control of VOCs, but not including engines used for self-propulsion.
- (~~676~~) EXEMPT COMPOUNDS are defined in District Rule 102 - Definition of Terms.
- (~~787~~) FACILITY means any source or group of sources or other air contaminant emitting activities 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 by persons under common control), or an outer continental shelf (OCS) source as determined in Section 55.2 of Title 40, Part 55 of the Code of Federal Regulations (40 CFR Part 55). Such above-described groups, if noncontiguous, but connected only by land carrying a pipeline, shall not be considered one facility. Sources or installations involved in crude oil and gas production in Southern California Coastal or OCS Waters and transport of such crude oil and gas in Southern California Coastal or OCS Waters shall be included in the same facility which is under the same ownership or use entitlement as the crude oil and gas production facility on-shore.
- (~~898~~) LEAN-BURN ENGINE means an engine that operates with high levels of excess air and an exhaust oxygen concentration of greater than 4 percent.
- (~~9109~~) LOCATION means any single site at a building, structure, facility, or installation. For the purpose of this definition, a site is a space occupied or to be occupied by an engine. For engines which are brought to a facility to perform maintenance on equipment at its permanent or ordinary location, each maintenance site shall be a separate location.
- (~~10170~~) NET ELECTRICAL ENERGY means the electrical energy produced by a generator, less the electrical energy consumed by any auxiliary equipment necessary to operate the engine generator and, if applicable, any heat recovery equipment, such as heat exchangers.
- (~~1121~~) NON-ROAD ENGINE is any engine, defined under 40 CFR Part 89, that does not remain or will not remain at a location for more than 12

consecutive months, or a shorter period of time where such period is representative of normal annual source operation at a stationary source that resides at a fixed location for more than 12 months (e.g., seasonal operations such as canning facilities), and meets one of the following:

- (A) Is used in or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as a mobile crane); or
- (B) Is used in or on a piece of equipment that is intended to be propelled while performing its function (such as lawn mowers and string trimmers); or
- (C) By itself, or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Transportability includes, but is not limited to, wheels, skids, carrying handles, dolly, trailer, platform or mounting.

(~~1232~~) OPERATING CYCLE means a period of time within which a round of regularly recurring events is completed, and cannot be stopped without the risk of endangering public safety or health, causing material damage to the equipment or product, or cannot be stopped due to technical constraints. Economic reasons alone will not be sufficient to extend this time period. The operating cycle includes batch processes that may start and finish several times within a twenty-four hour period, in which case each start to finish interval is considered a complete cycle.

(~~1343~~) OXIDES OF NITROGEN (NO<sub>x</sub>) means nitric oxide and nitrogen dioxide.

(~~1454~~) PORTABLE ENGINE is an engine that, by itself or in or on a piece of equipment, is designed to be and capable of being carried or moved from one location to another. Indications of portability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, platform or mounting. The operator must demonstrate the necessity of the engine being periodically moved from one location to another because of the nature of the operation.

An engine is not portable if:

- (A) the engine or its replacement remains or will reside at the same location for more than 12 consecutive months. Any engine, such as a back-up or stand-by engine, that replaces an engine at a location and is intended to perform the same function as the engine

being replaced, will be included in calculating the consecutive time period. In that case, the cumulative time of both engines, including the time between the removal of the original engine and installation of the replacement engine, will be counted toward the consecutive time period; or

- (B) the engine remains or will reside at a location for less than 12 consecutive months where such a period represents the full length of normal annual source operations such as a seasonal source; or
- (C) the engine is removed from one location for a period and then it or its equivalent is returned to the same location thereby circumventing the portable engine residence time requirements.

The period during which the engine is maintained at a designated storage facility shall be excluded from the residency time determination.

(~~1565~~) **RATED BRAKE HORSEPOWER (bhp)** is the rating specified by the manufacturer, without regard to any derating, and listed on the engine nameplate.

(~~1676~~) **RICH-BURN ENGINE WITH A THREE-WAY CATALYST** means an engine designed to operate near stoichiometric conditions with a catalytic control device that simultaneously reduces emissions of NO<sub>x</sub>, CO and VOC.

(~~1787~~) **STATIONARY ENGINE** is an engine which is either attached to a foundation or if not so attached, does not meet the definition of a portable or non-road engine and is not a motor vehicle as defined in Section 415 of the California Vehicle Code.

(~~1898~~) **TIER 2 AND TIER 3 DIESEL ENGINES** mean engines certified by CARB to meet Tier 2 or Tier 3 emission standards in accordance with Title 13, Chapter 9, Article 4 of the CCR.

(~~192019~~) **USEFUL HEAT RECOVERED** means the waste heat recovered from the engine exhaust and/or cooling system that is put to productive use. The waste heat recovered may be assumed to be 100% useful unless the hot water, steam or other medium is vented to the atmosphere, or sent directly to a cooling tower or other unproductive use.

(~~2070~~) **VOLATILE ORGANIC COMPOUND (VOC)** is as defined in Rule 102.

(d) Requirements

(1) Stationary Engines:

(A) Operators of stationary engines with an amended Rule 1110.1 Emission Control Plan submitted by July 1, 1991, or an Approved Emission Control Plan, designating the permanent removal of engines or the replacement of engines with electric motors, in accordance with subparagraph (d)(1)(B), shall do so by December 31, 1999, or not operate the engines on or after December 31, 1999 in a manner that exceeds the emission concentration limits listed in Table I:

TABLE I ALTERNATIVE TO ELECTRIFICATION CONCENTRATION LIMITS		
NO <sub>x</sub>	VOC	CO
(ppmvd) <sup>1</sup>	(ppmvd) <sup>2</sup>	(ppmvd) <sup>1</sup>
11	30	70

<sup>1</sup> Parts per million by volume, corrected to 15% oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Parts per million by volume, measured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.

(B) The operator of any ~~other~~ stationary engine not covered by (d)(1)(A) and not exempt from ~~subject to~~ this rule shall

(i) Remove such engine permanently from service or replace the engine with an electric motor, or

(ii) Not operate the engine in a manner that exceeds the applicable emission concentration limits listed in either Table II or Table III-A or B.

<b>TABLE II</b>		
<b>CONCENTRATION LIMITS</b>		
<b>NO<sub>x</sub> (ppmvd)<sup>1</sup></b>	<b>VOC (ppmvd)<sup>2</sup></b>	<b>CO (ppmvd)<sup>1</sup></b>
bhp ≥ 500: 36 bhp < 500: 45	250	2000
<b>CONCENTRATION LIMITS</b>		
<b>EFFECTIVE JULY 1, 2010</b>		
<b>NO<sub>x</sub> (ppmvd)<sup>1</sup></b>	<b>VOC (ppmvd)<sup>2</sup></b>	<b>CO (ppmvd)<sup>1</sup></b>
bhp ≥ 500: 11 bhp < 500: 45	bhp ≥ 500: 30 bhp < 500: 250	bhp ≥ 500: 250 bhp < 500: 2000

<b>CONCENTRATION LIMITS</b>		
<b>EFFECTIVE JULY 1, 2011</b>		
<b>NO<sub>x</sub> (ppmvd)<sup>1</sup></b>	<b>VOC (ppmvd)<sup>2</sup></b>	<b>CO (ppmvd)<sup>1</sup></b>
11	30	250

- <sup>1</sup> Parts per million by volume, corrected to 15% oxygen on a dry basis and averaged over 15 minutes.
- <sup>2</sup> Parts per million by volume, measured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.

The concentration limits effective on and after July 1, 2010 shall not apply to engines that operate less than 500 hours per year or use less than 1 x 10<sup>9</sup> British Thermal Units (Btus) per year (higher heating value) of fuel.

If the operator of a two-stroke engine equipped with an oxidation catalyst and insulated exhaust ducts and catalyst housing demonstrates that the CO and VOC limits effective on and after July 1, 2010 are not achievable, then the Executive Officer may, with United States Environmental Protection Agency (EPA) approval, establish technologically achievable, case-by-case CO and VOC limits in place of the concentration limits effective on

and after July 1, 2010. The case-by-case limits shall not exceed 250 ppmvd VOC and 2000 ppmvd CO.

If the operator of an engine that uses non-pipeline quality natural gas demonstrates that due to the varying heating value of the gas a longer averaging time is necessary, the Executive Officer may establish for the engine a longer averaging time, not to exceed six hours, for any of the concentration limits of Table II. Non-pipeline quality natural gas is a gas that does not meet the gas specifications of the local gas utility and is not supplied to the local gas utility.

- (C) ~~Notwithstanding the provisions in subparagraph (d)(1)(B),~~ The operator of any stationary engine fired by landfill or digester gas (biogas) shall not operate the engine in a manner that exceeds the emission concentration limits of Table III-A, provided that the facility monthly average biogas usage by the biogas engines is 90% or more, based on the higher heating value of the fuels used. The calculation of the monthly facility biogas use percentage may exclude natural gas fired during: any electrical outage at the facility; a Stage 2 or higher electrical emergencies called by the California Independent System Operator Corporation; and when a sewage treatment plant activates an Emergency Operations Center or Incident Command System, as part of an emergency response plan, because of either high influent flows caused by precipitation or a disaster.

~~The concentration limits effective on and after July 1, 2012 shall become effective provided the Executive Officer conducts a technology assessment that confirms that the limits are achievable, and reports to the Governing Board by July 2010, at a regularly scheduled public meeting.~~

~~The concentration limits effective on and after July 1, 2014 shall not apply to engines that operate less than 500 hours per year or use less than  $1 \times 10^9$  Btus per year (higher heating value) of fuel.~~



<b>TABLE III-A</b> <b>CONCENTRATION LIMITS FOR LANDFILL</b> <b>AND DIGESTER GAS (BIOGAS)-FIRED ENGINES</b>		
NO <sub>x</sub> (ppmvd) <sup>1</sup>	VOC (ppmvd) <sup>2</sup>	CO (ppmvd) <sup>1</sup>
bhp ≥ 500: 36 x ECF <sup>3</sup>	Landfill Gas: 40	2000
bhp < 500: 45 x ECF <sup>3</sup>	Digester Gas: 250 x ECF <sup>3</sup>	
<b>TABLE III-B</b> <b>CONCENTRATION LIMITS</b> <b>EFFECTIVE JANUARY 1, 2016</b>		
<u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u>	<u>VOC (ppmvd)<sup>2</sup></u>	<u>CO (ppmvd)<sup>1</sup></u>
<u>11</u>	<u>30</u>	<u>250</u>
<b>CONCENTRATION LIMITS</b> <b>EFFECTIVE JULY 1, 2012</b>		
<u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u>	<u>VOC (ppmvd)<sup>2</sup></u>	<u>CO (ppmvd)<sup>1</sup></u>
<u>11</u>	<u>30</u>	<u>250</u>
<b>TABLE III-B</b> <b>CONCENTRATION LIMITS AND COMPLIANCE SCHEDULE</b> <b>FOR LANDFILL AND DIGESTER GAS (BIOGAS)-FIRED</b> <b>ENGINES</b>		
<u>Category</u>	<u>Limit</u>	<u>Unit(s) Shall be in Full Compliance on or before</u>
<u>First Engine or Biogas Cleanup System for entire Biogas engine fleet</u>	<u>NO<sub>x</sub> (ppmvd)<sup>1</sup> = 11</u> <u>VOC (ppmvd)<sup>2</sup> = 30</u>	<u>July 1, 2015</u>
<u>Remaining Engine(s)</u>	<u>CO (ppmvd)<sup>1</sup> = 250</u>	<u>July 1, 2016</u>

- <sup>1</sup> Parts per million by volume, corrected to 15% oxygen on a dry basis and averaged over 15 minutes.
- <sup>2</sup> Parts per million by volume, measured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.
- <sup>3</sup> ECF is the efficiency correction factor.

The ECF shall be 1.0 unless:

- (i) The engine operator has measured the engine's net specific energy consumption ( $q_a$ ), in compliance with ASME Performance Test Code PTC 17 -1973, at the average load of the engine; and
- (ii) The ECF-corrected emission limit is made a condition of the engine's permit to operate.

The ECF is as follows:

$$ECF = \frac{9250 \text{ Btus/hp-hr}}{\text{Measured } q_a \text{ in Btus/hp-hr}}$$

Measured  $q_a$  shall be based on the lower heating value of the fuel. ECF shall not be less than 1.0.

The Executive Officer may approve the burning of more than 10% natural gas in a landfill or digester gas-fired engine, when it is necessary, if: the only alternative to limiting natural gas to 10% would be shutting down the engine and flaring more landfill or digester gas; or the engine requires more natural gas in order for a waste heat recovery boiler to provide enough thermal energy to operate a sewage treatment plant, and other boilers at the facility are unable to provide the necessary thermal energy.

~~Once an engine complies with concentration limits effective on and after July 1, 2012, there shall be no limit on the percentage of natural gas burned.~~

- (D) Notwithstanding the provisions of subparagraph (d)(1)(B), the operator of any stationary engine fired by landfill or digester gas (biogas) shall not operate the engine in a manner that exceeds the emission concentration limits of Table III.
- (E) Biogas engine operators that establish to the satisfaction of the Executive Officer that they have complied with the emissions limits of Table III-B by January 1, 2015 will have their respective engine permit application fees refunded.
- ~~(E)~~(F) Once an engine complies with the concentration limits as specified in Table III-B, there shall be no limit on the percentage of natural gas burned.

~~(D)(F)(G)~~ The concentration limits effective as specified in Table III-B shall not apply to engines that operate fewer than 500 hours per year or use less than  $1 \times 10^9$  Btus per year (higher heating value) of fuel.

~~(F)(G)(H)~~ An operator of a biogas engine may determine compliance with the NOx and/or CO limits of Table III-B by utilizing a longer averaging time as set forth below, provided the operator demonstrates through CEMS data that the engine is achieving a concentration at or below 9.9 ppmv for NOx and 225 ppmv for CO (if CO is elected for averaging), (each corrected to 15% O<sub>2</sub>), over a 4 month time period. An operator may utilize a monthly fixed interval averaging time for the first 4 months of the retrofitted engine's operation and up to a ~~24~~2 hour fixed interval averaging time thereafter. For purposes of determining compliance using a longer averaging time:

(i) An operator shall not average data during one-minute periods in which the underlying equipment is not operated or when the CEMS is undergoing zero or calibration checks, cylinder gas audits, or routine maintenance in accordance with the provisions in Rules 218 and 218.1 ~~periods of calibration or audit.~~

(ii) Notwithstanding the requirements of Rules 218 and 218.1, for one-minute time periods where NOx and/or CO CEMS data are greater than 95 percent of the Rule 218.1 Full Scale Range while the underlying equipment is operating, an operator shall use substitute data. ~~For one-minute time periods where NOx and/or CO CEMS data do not meet the requirements of Rules 218 and 218.1 while the underlying equipment is operating, an operator shall use substitute data for the missing one-minute CEMS data. A concentration equivalent to 3 times the NOx and/or CO emission limits in Table III-B (each corrected to 15% O<sub>2</sub>) shall be used as substitute data. An operator shall use substitute CEMS data for all other one-minute CEMS data when NOx and/or CO emissions data has not been obtained or recorded or~~

~~does not meet the requirements of Rules 218 and 218.1. A concentration of 36 ppmv for NOx and 2000 ppmv for CO (each corrected to 15% O<sub>2</sub>) shall be used as substitute data.~~

~~(iii) The provisions of clause (d)(1)(H)(ii) supersede those in Rule 218 (f)(3)(B).~~

~~(iii\*) The intentional shutdown of a CEMS to circumvent the emission limits of Table III-B while the underlying equipment is in operation shall constitute a violation of this rule.~~

~~(iv) The averaging provisions of this subparagraph shall not apply to CEMS that are time shared by multiple biogas engines.~~

~~(I)(H)(I)~~ The operator of any new engine subject to subparagraph (e)(1)(B) shall:

- (i) Comply with the requirements of Best Available Control Technology in accordance with Regulation XIII if the engine requires a District permit; or
- (ii) Not operate the engine in a manner that exceeds the emission concentration limits in Table I if the engine does not require a District permit.

~~(J)(A)(J)~~ By February 1, 2009, the operator of a spark-ignited engine without a Rule 218-approved continuous emission monitoring system (CEMS) or a Regulation XX (RECLAIM)-approved CEMS shall equip and maintain the engine with an air-to-fuel ratio controller with an oxygen sensor and feedback control, or other equivalent technology approved by the Executive Officer, CARB and EPA.

~~(K)(A)(K)~~ New Non-Emergency Electrical Generators

- (i) All new non-emergency engines driving electrical-generators shall comply with the following emission standards:

<b>TABLE IV EMISSION STANDARDS FOR NEW ELECTRICAL GENERATION ENGINES</b>	
<b>Pollutant</b>	<b>Emission Standard (lbs/MW-hr)<sup>1</sup></b>
NOx	0.070
CO	0.20
VOC	0.10 <sup>2</sup>

1. The averaging time of the emission standards is 15 minutes for NOx and CO and the sampling time required by the test method for VOC, except as described in the following clause.
2. Mass emissions of VOC shall be calculated using a ratio of 16.04 pounds of VOC per lb-mole of carbon.

(ii) Engines subject to this subparagraph that produce combined heat and electrical power may include one megawatt-hour (MW-hr) for each 3.4 million Btus of useful heat recovered (MW<sub>th</sub>-hr), in addition to each MW-hr of net electricity produced (MW<sub>e</sub>-hr). The compliance of such engines shall be based on the following equation:

$$\frac{\text{Lbs}}{\text{MW-hr}} = \frac{\text{Lbs}}{\text{MW}_e\text{-hr}} \times \text{Electrical Energy Factor (EEF)}$$

Where:

Lbs/MW-hr = The calculated emissions that shall comply with the emission standards in Table IV

Lbs/MW<sub>e</sub>-hr = The short-term engine emission limit in pounds per MW<sub>e</sub>-hr of net electrical energy produced, averaged over 15 minutes. The engine shall comply with this limit at all times.

EEF = The annual MW<sub>e</sub>-hrs of net electrical energy produced divided by the sum of annual MW<sub>e</sub>-hrs plus annual MW<sub>th</sub>-hrs of useful heat recovered. The engine operator shall demonstrate

annually that the EEF is less than the value required for compliance.

- (iii) For combined heat and power engines, the short-term emission limits in lbs/MW<sub>e</sub>-hr and the maximum allowed annual EEF must be selected by operator and stated on the operating permit.
- (iv) Notwithstanding Rule 2001, the requirements of this subparagraph shall apply to NO<sub>x</sub> emissions from new non-emergency engines driving electrical-generators subject to Regulation XX (RECLAIM).
- (v) This subparagraph does not apply to: engines installed prior to February 1, 2008; engines issued a permit to construct prior to February 1, 2008 and installed within 12 months of the date of the permit to construct; engines for which an application is deemed complete by October 1, 2007; engines installed by an electric utility on Santa Catalina Island; engines installed at remote locations without access to natural gas and electric power; engines used to supply electrical power to ocean-going vessels while at berth, prior to January 1, 2014; or landfill or digester gas-fired engines that meet the requirements of subparagraph (d)(1)(C).

(2) Portable Engines:

- (A) The operator of any portable engine generator subject to this rule shall not use the portable generator for:
  - (i) Power production into the electric grid, except to maintain grid stability during an emergency event or other unforeseen event that affects grid stability; or
  - (ii) Primary or supplemental power to a building, facility, stationary source, or stationary equipment, except during unforeseen interruptions of electrical power from the serving utility, maintenance and repair operations, and remote operations where grid power is unavailable. For interruptions of electrical power, the operation of a portable generator shall not exceed the time of the actual interruption of power.

This subparagraph shall not apply to a portable generator that complies with emission concentration limits of Table I and the other requirements in this rule applicable to stationary engines.

- (B) The operator of any portable diesel engine shall comply with the applicable requirements of the Subchapter 7.5 Airborne Toxic Control Measures for diesel particulate matter in Chapter 1, Division 3, Title 17 of the California Code of Regulations.
- (C) The operator of any portable spark-ignited engine shall comply with the applicable requirements of the Large Spark Ignition Engine Fleet Requirements, Article 2, Chapter 15, Division 3, Title 13 of the California Code of Regulations.

(e) Compliance

(1) Agricultural Stationary Engines:

- (A) The operator of any agricultural stationary engine subject to this rule and installed or issued a permit to construct prior to June 3, 2005 shall comply with subparagraph (d)(1)(B) and the other applicable provisions of this rule in accordance with the compliance schedules in Table V:

<b>TABLE V COMPLIANCE SCHEDULES FOR STATIONARY AGRICULTURAL ENGINES</b>		
<b>Action Required</b>	<b>Tier 2 and Tier 3 Diesel Engines, Certified Spark-Ignition Engines, and All Engines at Facilities with Actual Emissions Less Than the Amounts in the Table of Rule 219(q)</b>	<b>Other Engines</b>
Submit notification of applicability to the Executive Officer	January 1, 2006	January 1, 2006
Submit to the Executive Officer applications for permits to construct engine modifications, control equipment, or replacement engines	March 1, 2009	September 1, 2007

<b>TABLE V COMPLIANCE SCHEDULES FOR STATIONARY AGRICULTURAL ENGINES</b>		
<b>Action Required</b>	<b>Tier 2 and Tier 3 Diesel Engines, Certified Spark-Ignition Engines, and All Engines at Facilities with Actual Emissions Less Than the Amounts in the Table of Rule 219(q)</b>	<b>Other Engines</b>
Initiate construction of engine modifications, control equipment, or replacement engines	September 30, 2009, or 30 days after the permit to construct is issued, whichever is later	March 30, 2008, or 30 days after the permit to construct is issued, whichever is later
Complete construction and comply with applicable requirements	January 1, 2010, or 60 days after the permit to construct is issued, whichever is later	July 1, 2008, or 60 days after the permit to construct is issued, whichever is later
Complete initial source testing	March 1, 2010, or 120 days after the permit to construct is issued, whichever is later	September 1, 2008, or 120 days after the permit to construct is issued, whichever is later

The notification of applicability shall include the following for each engine:

- (i) Name and mailing address of the operator
  - (ii) Address of the engine location
  - (iii) Manufacturer, model, serial number, and date of manufacture of the engine
  - (iv) Application number
  - (v) Engine type (diesel, rich-burn spark-ignition or lean-burn spark-ignition)
  - (vi) Engine fuel type
  - (vii) Engine use (pump, compressor, generator, or other)
  - (viii) Expected means of compliance (engine replacement, control equipment installation, or electrification)
- (B) The operator of any new agricultural stationary engine that is not subject to the compliance schedule of subparagraph (e)(1)(A) for



existing engines shall comply with the requirements of subparagraph (d)(1)(~~HD~~) immediately upon installation.

- (2) Non-Agricultural Stationary Engines:
  - (A) The operator of any stationary engine not meeting the requirements of subparagraphs (d)(1)(B) or (d)(1)(C) that go into effect in 2010 or later, shall comply with the compliance schedule in Table VI:

<b>TABLE VI COMPLIANCE SCHEDULE FOR NON- -AGRICULTURAL STATIONARY ENGINES</b>	
<b>Action Required</b>	<b>Applicable Compliance Date</b>
Submit to the Executive Officer applications for permits to construct engine modifications, control equipment, or replacement engines	Twelve months before the final compliance date
Initiate construction of engine modifications, control equipment, or replacement engines	Three months before the final compliance date, or 60 days after the permit to construct is issued, whichever is later
Complete construction and comply with applicable requirements	The final compliance date, or 120 days after the permit to construct is issued, whichever is later
Complete initial source testing	60 days after the final compliance date in (d)(1)(B) or (d)(1)(C), or 180 days after the permit to construct is issued, whichever is later

- (B) The operator of any stationary engine that elects to amend a permit to operate to incorporate ECF-adjusted emission limits shall submit to the Executive Officer an application for a change of permit conditions by August 1, 2008, and comply with emission limits of the previous version of this rule until February 1, 2009 when the engine shall be in compliance with the emission limits of this rule.

- (C) The operator of any stationary engine that is required to add operating restrictions to a permit to operate to meet the requirements of this rule shall submit to the Executive Officer an application for a change of permit conditions by August 1, 2008.
- (3) Stationary Engine CEMS
  - (A) The operator of any stationary engine with an existing CEMS shall commence the reporting required by Rule 218 Subdivision (f) on January 1, 2008. The first summary report for the six months ending June 30, 2008 shall be due on July 30, 2008.
  - (B) The operator of any stationary engine that is required to modify an existing CEMS or install a CEMS on an existing engine shall comply with the compliance schedule in Table VII. Public agencies shall be allowed one year more than the dates in Table VII, except for biogas engines.

<b>TABLE VII COMPLIANCE SCHEDULE FOR NEW OR MODIFIED CEMS ON EXISTING ENGINES</b>			
<b>Action Required</b>	<b>Applicable Compliance Dates For:</b>		
	<b>Non-Biogas Engines Rated at 750 bhp or More</b>	<b>Non-Biogas Engines Rated at Less than 750 bhp</b>	<b>Biogas Engines*</b>
Submit to the Executive Officer applications for new or modified CEMS	August 1, 2008	August 1, 2009	January 1, 2011
Complete installation and commence CEMS operation, calibration, and reporting requirements	Within 180 days of initial approval	Within 180 days of initial approval	Within 180 days of initial approval
Complete certification tests	Within 90 days of installation	Within 90 days of installation	Within 90 days of installation
Submit certification reports to Executive Officer	Within 45 days after tests are completed	Within 45 days after tests are completed	Within 45 days after tests are completed
Obtain final approval of CEMS	Within 1 year of initial approval	Within 1 year of initial approval	Within 1 year of initial approval

\* A biogas engine is one that is subject to the emission limits of Table III.

- (4) Stationary Engine Inspection and Monitoring (I&M) Plans:  
The operator of stationary engines subject to the I&M plan provisions of subparagraph (f)(1)(D) shall:
- (A) By August 1, 2008, submit an initial I&M plan application to the Executive Officer for approval;
  - (B) By December 1, 2008, implement an approved I&M plan or the I&M plan as submitted if the plan is not yet approved.
- Any operator of 15 or more stationary engines subject to the I&M plan provisions shall comply with the above schedule for at least 50% of engines, and for the remaining engines shall:
- (C) By February 1, 2009, submit an initial I&M plan application to the Executive Officer for approval;
  - (D) By June 1, 2009, implement an approved I&M plan or the I&M plan as submitted if the plan is not yet approved.
- (5) Stationary Engine Air-to-Fuel Ratio Controllers
- (A) The operator of any stationary engine that does not have an air-to-fuel ratio controller, as required by subparagraph (d)(1)(~~JAE~~), shall comply with those requirements in accordance with the compliance schedule in Table VI, except that the application due date is no later than May 1, 2008 and the initial source testing may be conducted at the time of the testing required by subparagraph (f)(1)(C).
  - (B) The operator of any stationary engine that has the air-to-fuel ratio controller required by subparagraph (d)(1)(~~JAE~~), but it is not listed on the permit to operate, shall submit to the Executive Officer an application to amend the permit by April 1, 2008.
  - (C) The operator of more than five engines that do not have air-to-fuel ratio controllers may take an additional three months, to May 1, 2009, to install the equipment on up to 50% of the affected engines.
- (6) New Stationary Engines  
The operator of any new stationary engine issued a permit to construct after February 1, 2008 shall comply with the applicable I&M or CEMS requirements of this rule when operation commences. If applicable, the operator shall provide the required information in subparagraph (f)(1)(D) to the Executive Officer prior to the issuance of the permit to construct so

that the I&M procedures can be included in the permit. A separate I&M plan application is not required.

(7) Biogas Engines

For any biogas engine for which the operator applies to the Executive Officer by April 1, 2008 for a change of permit conditions for ECF-corrected emission limits, or the approval to burn more than 10 percent natural gas in accordance with subparagraph (d)(1)(~~CEC~~), the biogas engine shall not be subject to the initial concentration limits of Tables II or III until August 1, 2008, provided the operator continues to comply with all emission limits in effect prior to February 1, 2008.

(8) Compliance Schedule Exception

If an engine operator submits to the Executive Officer an application for an administrative change of permit conditions to add a permit condition that causes the engine permit to expire by the effective date of any requirement of this rule, then the operator is not required to comply with the earlier steps required by this subdivision for that requirement. The effective date for the CEMS requirements shall be one year after the date that a CEMS application is due.

(9) Exceedance of Usage Limits

(A) If an engine was initially exempt from the new concentration limits in subparagraph (d)(1)(B) or subparagraph (d)(1)(C) that take effect on or after July 1, 2010 because of low engine use but later exceeds the low-use criteria, the operator shall bring the engine into compliance with the rule in accordance with the schedule in Table VI with the final compliance date in Table VI being twelve months after the conclusion of the first twelve-month period for which the engine exceeds the low-use criteria.

(B) If engines that were initially exempt from new CEMS by the low-use criterion in subclause (f)(1)(A)(ii)(I) later exceed that criterion, the operator shall install CEMS on those engines in accordance with the schedule in Table VII, except that the date for submitting the CEMS application in Table VII shall be six months after the conclusion of the first twelve-month period for which the engines exceed the criterion.

(f) Monitoring, Testing, Recordkeeping and Reporting

(1) Stationary engines:

The operator of any engine subject to the provisions of paragraph (d)(1) of this rule shall meet the following requirements:

(A) Continuous Emission Monitoring

(i) For engines of 1000 bhp and greater and operating more than two million bhp-hr per calendar year, a NO<sub>x</sub> and CO continuous emission monitoring system (CEMS) shall be installed, operated and maintained in calibration to demonstrate compliance with the emission limits of this rule.

(ii) (I) For facilities with engines subject to paragraph (d)(1), having a combined rating of 1500 bhp or greater at the same location, and having a combined fuel usage of more than  $16 \times 10^9$  Btus per year (higher heating value), CEMS shall be installed, operated and maintained in calibration to demonstrate compliance of those engines with the applicable NO<sub>x</sub> and CO emission limits of this rule.

(II) Any engine that as of October 1, 2007 is located within 75 feet of another engine (measured from engine block to engine block) is considered to be at the same location. Operators of new engines shall not install engines farther than 75 feet from another engine unless the operator demonstrates to the Executive Officer that operational needs or space limitations require it.

(III) The following engines shall not be counted toward the combined rating or required to have a CEMS by this clause: engines rated at less than 500 bhp; standby engines that are limited by permit conditions to only operate when other primary engines are not operable; engines that are limited by permit conditions to operate less than 1000 hours per year or a fuel usage of less than  $8 \times 10^9$  Btus per

year (higher heating value of all fuels used); engines that are used primarily to fuel public natural gas transit vehicles and that are required by a permit condition to be irreversibly removed from service by December 31, 2014; and engines required to have a CEMS by the previous clause. A CEMS shall not be required if permit conditions limit the simultaneous use of the engines at the same location in a manner to limit the combined rating of all engines in simultaneous operation to less than 1500 bhp.

- (IV) For engines rated below 1000 bhp, the CEMS may be time shared by multiple engines.
- (V) Operation of engines by the electric utility in the Big Bear Lake area during the failure of a transmission line to the utility may be excluded from an hours-per-year or fuel usage limit that is elected by the operator pursuant to subclause (f)(1)(A)(ii)(III).
- (VI) In lieu of complying with subclause (f)(1)(A)(ii)(I), an operator that is a public agency, or is contracted to operate engines solely for a public agency, may comply with the Inspection and Monitoring Plan requirements of subparagraph (f)(1)(D), except that the operator shall conduct emission checks at least weekly or every 150 operating hours, whichever occurs later. If any such engine is found to exceed an applicable NO<sub>x</sub> or CO limit by a source test required by subparagraph (f)(1)(C) or District test using a portable analyzer on three or more occasions in any 12-month period, the operator shall comply with the CEMS requirements of this subparagraph for such engine in accordance with the compliance schedule of Table VII, except that the operator shall submit a CEMS application to the

Executive Officer within six months of the third exceedance.

- (iii) All CEMS required by this rule shall:
  - (I) Comply with the applicable requirements of Rule 218, including equipment specifications and certification, operating, recordkeeping, quality assurance and reporting requirements, except as otherwise authorized by this rule;
  - (II) Include equipment that measures and records exhaust gas concentrations, both uncorrected and corrected to 15 percent oxygen on a dry basis; and
  - (III) Have data gathering and retrieval capability approved by the Executive Officer
- (iv) The operator of an engine that is required to install CEMS may request the Executive Officer to approve an alternative monitoring device (or system components) to demonstrate compliance with the emission limits of this rule. The applicant shall demonstrate to the Executive Officer that the proposed alternative monitoring device is at a minimum equivalent in relative accuracy, precision, reliability, and timeliness to a CEMS for that engine, according to the criteria specified in 40 CFR Part 75 Subpart E. In lieu of the criteria specified in 40 CFR Part 75 Subpart E, substitute criteria is acceptable if the applicant demonstrates to the Executive Officer that the proposed alternative monitoring device is at minimum equivalent in relative accuracy, precision, reliability, and timeliness to a CEMS for that engine. Upon approval by the Executive Officer, the substitute criteria shall be submitted to EPA as an amendment to the State Implementation Plan (SIP).

If the alternative monitoring device is denied or fails to be recertified, a CEMS shall be required.
- (v) Notwithstanding the requirements of Rules 218 and 218.1, operators of engines that are required to install a CEMS by clause (f)(1)(A)(ii) of this subparagraph may:

- (I) Store data electronically without a strip chart recorder, but there shall be redundant data storage capability for at least 15 days of data. The operator must demonstrate that both sets of data are equivalent.
  - (II) Conduct relative accuracy testing on the same schedule for source testing in clause (f)(1)(C)(i), instead of annually. The minimum sampling time for each test is 15 minutes.
- (vi) Notwithstanding the requirements of Rules 218 and 218.1, operators of engines that are required to install a CEMS by clause (ii) of this subparagraph, and that are to be monitored by a timeshared CEMS, may:
- (I) Monitor an engine with the CEMS for 15 consecutive minutes, purge for the minimum required purge time, then monitor the next engine for 15 consecutive minutes. The CEMS shall operate continuously in this manner, except for required calibrations.
  - (II) Record the corrected and uncorrected NO<sub>x</sub>, CO and diluent data at least once per minute and calculate and record the 15-minute average corrected concentrations for each sampling period.
  - (III) Have sample lines to each engine that are not the same length. The purge time will be based on the sample line with the longest response time. Response times shall be checked during cylinder gas audits. Sample lines shall not exceed 100 feet in length.
  - (IV) Conduct a minimum of five tests for each engine during relative accuracy tests.
  - (V) Perform a cylinder gas audit every calendar quarter on each engine, except for engines for which relative accuracy testing was conducted that quarter.
  - (VI) Exclude monitoring of nitrogen dioxide (NO<sub>2</sub>) for rich-burn engines, unless source testing



demonstrates that NO<sub>2</sub> is more than 10 percent of total NO<sub>x</sub>.

- (VII) Conduct daily calibration error (CE) tests by injecting calibration gases at the analyzers, except that at least once per week the CE test shall be conducted by injecting calibration gases as close to the probe tip as practical.
  - (VIII) Stop operating and calibrating the CEMs during any period that the operator has a continuous record that the engine was not in operation.
  - (vii) A CO CEMS shall not be required for lean-burn engines or an engine that is subject to Regulation XX (RECLAIM), and not required to have a NO<sub>x</sub> CEMS by that regulation.
  - (viii) Notwithstanding the requirements of this paragraph and paragraph (c)(2) of Rule 2012, an operator may take an existing NO<sub>x</sub> CEMS out of service for up to two weeks (cumulative) in order to modify the CEMS to add CO monitoring.
- (B) Elapsed Time Meter  
Maintain an operational non-resettable totalizing time meter to determine the engine elapsed operating time.
- (C) Source Testing
- (i) Effective August 1, 2008, conduct source testing for NO<sub>x</sub>, VOC reported as carbon, and CO concentrations (concentrations in ppm by volume, corrected to 15 percent oxygen on dry basis) at least once every two years, or every 8,760 operating hours, whichever occurs first. Relative accuracy tests required by Rule 218.1 or 40 CFR Part 75 Subpart E will satisfy this requirement for those pollutants monitored by a CEMS. The source test frequency may be reduced to once every three years if the engine has operated less than 2,000 hours since the last source test. If the engine has not been operated within three months of the date a source test is required, the source test shall be conducted when the engine resumes operation for a period longer than either seven consecutive days or 15 cumulative

days of operation. The operator of the engine shall keep sufficient operating records to demonstrate that it meets the requirements for extension of the source testing deadlines.

- (ii) Conduct source testing for at least 30 minutes during normal operation (actual duty cycle). This test shall not be conducted under a steady-state condition unless it is the normal operation. In addition, conduct source testing for NO<sub>x</sub> and CO emissions for at least 15 minutes at: an engine's actual peak load, or the maximum load that can be practically achieved during the test, and; at actual minimum load, excluding idle, or the minimum load that can be practically achieved during the test. These additional two tests are not required if the permit limits the engine to operating at one defined load,  $\pm 10\%$ . No pre-tests for compliance are permitted. The emission test shall be conducted at least 40 operating hours, or at least 1 week, after any engine servicing or tuning. If an emission exceedance is found during any of the three phases of the test, that phase shall be completed and reported. The operator shall correct the exceedance, and the source test may be immediately resumed.
- (iii) Use a contractor to conduct the source testing that is approved by the Executive Officer under the Laboratory Approval Program for the necessary test methods.
- (iv) Submit a source test protocol to the Executive Officer for written approval at least 60 days before the scheduled date of the test. The source test protocol shall include the name, address and phone number of the engine operator and a District-approved source testing contractor that will conduct the test, the application and permit number(s), emission limits, a description of the engine(s) to be tested, the test methods and procedures to be used, the number of tests to be conducted and under what loads, the required minimum sampling time for the VOC test, based on the analytical detection limit and expected VOC levels, and a description of the parameters to be measured in accordance

with the I&M plan required by subparagraph (f)(1)(D). The source test protocol shall be approved by the Executive Officer prior to any testing. The operator is not required to submit a protocol for approval if: there is a previously approved protocol that meets these requirements; the engine has not been altered in a manner that requires a permit alteration; and emission limits have not changed since the previous test. If the operator submits the protocol by the required date, and the Executive Officer takes longer than 60 days to approve the protocol, the operator shall be allowed the additional time needed to conduct the test.

- (v) Provide the Executive Officer at least 30 days prior notice of any source test to afford the Executive Officer the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the engine operator shall notify the Executive Officer as soon as possible of any delay in the original test date, either by providing at least seven days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Executive Officer by mutual agreement.
- (vi) Submit all source test reports, including a description of the equipment tested, to the Executive Officer within 60 days of completion of the test.
- (vii) By February 1, 2009, provide, or cause to be provided, source testing facilities as follows:
  - (I) Sampling ports adequate for the applicable test methods. This includes constructing the air pollution control system and stack or duct such that pollutant concentrations can be accurately determined by applicable test methods;
  - (II) Safe sampling platform(s), scaffolding or mechanical lifts, including safe access, that comply with California General Safety Orders. Agricultural stationary engines are excused from this subclause

if they are in remote locations without electrical power;

- (III) Utilities for sampling and testing equipment. Agricultural stationary engines are exempt from this subclause if they are on wheels and moved to storage during the off season.

(D) Inspection and Monitoring (I&M) Plan

Submit to the Executive Officer for written approval and implement an I&M plan. One plan application is required for each facility. The I&M plan shall include:

- (i) Identification of engine and control equipment operating parameters necessary to maintain pollutant concentrations within the rule and permit limits. This shall include, but not be limited to:

- (I) Procedures for using a portable NO<sub>x</sub>, CO and oxygen analyzer to establish the set points of the air-to-fuel ratio controller (AFRC) at 25%, 60% and 95% load (or fuel flow rate),  $\pm 5\%$ , or the minimum, midpoint and maximum loads that actually occur during normal operation,  $\pm 5\%$ , or at any one load within the  $\pm 10\%$  range that an engine permit is limited to in accordance with clause (f)(1)(C)(ii);

- (II) Procedures for verifying that the AFRC is controlling the engine to the set point during the daily monitoring required by clause (f)(1)(D)(iv);

- (III) Procedures for reestablishing all AFRC set points with a portable NO<sub>x</sub>, CO and oxygen analyzer whenever a set point must be readjusted, within 24 hours of an oxygen sensor replacement, and, for rich-burn engines with three way catalysts, between 100 and 150 engine operating hours after an oxygen sensor replacement;

- (IV) For engines with catalysts, the maximum allowed exhaust temperature at the catalyst inlet, based on catalyst manufacturer specifications;

- (V) For lean-burn engines with selective catalytic control devices, the minimum exhaust temperature at the catalyst inlet required for reactant flow (ammonia or urea), and procedures for using a portable NOx and oxygen analyzer to establish the acceptable range of reactant flow rate, as a function of load.

Parameter monitoring is not required for diesel engines without exhaust gas recirculation and catalytic exhaust control devices.

- (ii) Procedures for alerting the operator to emission control malfunctions. Engine control systems, such as air-to-fuel ratio controllers, shall have a malfunction indicator light and audible alarm.
- (iii) Procedures for at least weekly or every 150 engine operating hours, whichever occurs later, emissions checks by a portable NOx, CO and oxygen analyzer.

- (I) If an engine is in compliance for three consecutive emission checks, without any adjustments to the oxygen sensor set points, then the engine may be checked monthly or every 750 engine operating hours, whichever occurs later, until there is a noncompliant emission check or, for rich-burn engines with three-way catalysts, the oxygen sensor is replaced. When making adjustments to the oxygen sensor set points, returning to a more frequent emission check schedule is not required if the engine is in compliance with the applicable emission limits prior to and after the set point adjustments, notwithstanding the requirements of (f)(1)(D)(iii)(IV).

- (II) For diesel engines and other lean-burn engines that are subject to Regulation XX or have a NOx CEMs, and that are subject to a CO limit more stringent than the 2000 ppmvd limit of Tables II or III, a CO emission check shall be performed at least

quarterly, or every 2,000 engine operating hours, whichever occurs later.

- (III) For diesel engines and other lean-burn engines that are subject to Regulation XX or have a NO<sub>x</sub> CEMs, and that are not subject to a CO limit more stringent than the 2000 ppmvd limit of Tables II or III, emission checks are not required.
  - (IV) No engine or control system maintenance or tuning may be conducted within 72 hours prior to the emission check, unless it is an unscheduled, required repair.
  - (V) The portable analyzer shall be calibrated, maintained and operated in accordance with the manufacturer's specifications and recommendations and the Protocol for the Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Stationary Engines Subject to South Coast Air Quality Management District Rule 1110.2, approved on February 1, 2008, or subsequent protocol approved by EPA and the Executive Officer.
- (iv) Procedures for at least daily monitoring, inspection and recordkeeping of:
- (I) engine load or fuel flow rate;
  - (II) the set points, maximums and acceptable ranges of the parameters identified by clause (f)(1)(D)(i), and the actual values of the same parameters;
  - (III) the engine elapsed time meter operating hours;
  - (IV) the operating hours since the last emission check required by clause (f)(1)(D)(iii);
  - (V) for rich-burn engines with three-way catalysts, the difference of the exhaust temperatures ( $\Delta T$ ) at the inlet and outlet of the catalyst (changes in the  $\Delta T$  can indicate changes in the effectiveness of the catalyst);

(VI) engine control system and AFRC system faults or alarms that affect emissions.

The daily monitoring and recordkeeping may be done in person by the operator, or by remote monitoring.

(v) Procedures for responding to, diagnosing and correcting breakdowns, faults, malfunctions, alarms, emission checks finding emissions in excess of rule or permit limits, and parameters out-of-range.

(I) For a breakdown resulting in a violation of this rule or a permit condition, or for an emission check that finds emissions in excess of those allowed by this rule or a permit condition, the operator shall correct the problem and demonstrate compliance with another emission check, or shut down an engine by the end of an operating cycle, or within 24 hours from the time the operator knew of the breakdown or excess emissions, or reasonably should have known, whichever is sooner.

(II) For other problems, such as parameters out-of-range, an operator shall correct the problem and demonstrate compliance with another emission check within 48 hours of the operator first knowing of the problem.

(III) An operator shall not be considered in violation of the emission limits of this rule or in permit conditions if the operator complies with this subparagraph and the reporting requirements of subparagraph (f)(1)(H). Any emission check conducted by District staff that finds excess emissions is a violation.

(vi) Procedures and schedules for preventive and corrective maintenance.

(vii) Procedures for reporting noncompliance to the Executive Officer in accordance with subparagraph (f)(1)(H).

(viii) Procedures and format for the recordkeeping of monitoring and other actions required by the plan.

- (ix) Procedures for plan revisions. Before any change in I&M plan operations can be implemented, the revised I&M plan shall be submitted to and approved by the Executive Officer. The operator shall apply for a plan revision prior to any change in emission limits or control equipment.
- (x) An engine is not subject to this subparagraph if it is required by this rule to have a NO<sub>x</sub> and CO CEMS, or voluntarily has a NO<sub>x</sub> and CO CEMS that complies with this rule.

(E) Operating Log

Maintain a monthly engine operating log that includes:

- (i) Total hours of operation;
- (ii) Type of liquid and/or type of gaseous fuel;
- (iii) Fuel consumption (cubic feet of gas and gallons of liquid);  
and
- (iv) Cumulative hours of operation since the last source test required in subparagraph (f)(1)(C).

Facilities subject to Regulation XX may maintain a quarterly log for engines that are designated as a process unit on the facility permit.

(F) New Non-Emergency Electrical Generating Engines

Operators of engines subject to the requirements of subparagraph (d)(1)(~~K~~/~~F~~) shall also meet the following requirements.

- (i) The engine generator shall be monitored with a calibrated electric meter that measures the net electrical output of the engine generator system, which is the difference between the electrical output of the generator and the electricity consumed by the auxiliary equipment necessary to operate the engine generator.
- (ii) For engines monitored with a CEMS, the emissions of the monitored pollutants in ppmvd corrected to 15% O<sub>2</sub>, lbs/hr, and lbs/MW<sub>e</sub>-hr and the net MW<sub>e</sub>-hrs produced shall be calculated and recorded for the four 15-minute periods of each hour of operation. The mass emissions of NO<sub>x</sub> shall be calculated based on the measured fuel flow and one of the F factor methods of 40 CFR 60, Appendix A, Method



19, or other method approved by the Executive Officer. Mass emissions of CO shall be calculated in the same manner as NO<sub>x</sub>, except that the ppmvd CO shall be converted to lb/scf using a conversion factor of  $0.727 \times 10^{-7}$ .

- (iii) For NO<sub>x</sub> and CO emissions from engines not monitored with a CEMS and VOC emissions from all engines, the emissions of NO<sub>x</sub>, CO and VOC in lbs/MW<sub>e</sub>-hr shall be calculated and recorded whenever the pollutant is measured by a source test or emission check. Mass emissions of NO<sub>x</sub> and CO shall be calculated in the same manner as the previous clause. Mass emissions of VOC shall be calculated in the same manner, except that the ppmvd VOC as carbon shall be converted to lb/scf using a conversion factor of  $0.415 \times 10^{-7}$ .
- (iv) For engines generating combined heat and power that rely on the EEF to comply with Table IV emission standards, the daily and annual useful heat recovered (MW<sub>th</sub>-hrs), net electrical energy generated (MW<sub>e</sub>-hrs) and EEF shall be monitored and recorded.
- (v) Other methods of calculating mass emissions than those specified, such as by direct measurement of exhaust volume, may be used if approved by the Executive Officer. All monitoring, calculation, and recordkeeping procedures must be approved by the Executive Officer.
- (vi) Operators of combined heat and power engines shall submit to the Executive Officer the reports of the following information within 15 days of the end of the first year of operation, and thereafter within 15 days of the end of each calendar year: the annual net electrical energy generated (MW<sub>e</sub>-hrs); the annual useful heat recovered (MW<sub>th</sub>-hrs), the annual EEF calculated in accordance with clause (d)(1)(~~K,F~~)(ii); and the maximum annual EEF allowed by the operating permit. If the actual annual EEF exceeds the allowed EEF, the report shall also include the time periods

and emissions for all instances where emissions exceeded any emission standard in Table IV.

(G) Portable Analyzer Operator Training

The portable analyzer tests required by the I&M Plan requirements of subparagraph (f)(1)(D) shall only be conducted by a person who has completed an appropriate District-approved training program in the operation of portable analyzers and has received a certification issued by the District.

(H) Reporting Requirements

(i) The operator shall report to the Executive Officer, by telephone (1-800-CUT-SMOG or 1-800-288-7664) or other District-approved method, any breakdown resulting in emissions in excess of rule or permit emission limits within one hour of such noncompliance or within one hour of the time the operator knew or reasonably should have known of its occurrence. Such report shall identify the time, specific location, equipment involved, responsible party to contact for further information, and to the extent known, the causes of the noncompliance, and the estimated time for repairs. In the case of emergencies that prevent a person from reporting all required information within the one-hour limit, the Executive Officer may extend the time for the reporting of required information provided the operator has notified the Executive Officer of the noncompliance within the one-hour limit.

(ii) Within seven calendar days after the reported breakdown has been corrected, but no later than thirty calendar days from the initial date of the breakdown, unless an extension has been approved in writing by the Executive Officer, the operator shall submit a written breakdown report to the Executive Officer which includes:

- (I) An identification of the equipment involved in causing, or suspected of having caused, or having been affected by the breakdown;
- (II) The duration of the breakdown;

- (III) The date of correction and information demonstrating that compliance is achieved;
  - (IV) An identification of the types of excess emissions, if any, resulting from the breakdown;
  - (V) A quantification of the excess emissions, if any, resulting from the breakdown and the basis used to quantify the emissions;
  - (VI) Information substantiating whether the breakdown resulted from operator error, neglect or improper operation or maintenance procedures;
  - (VII) Information substantiating that steps were immediately taken to correct the condition causing the breakdown, and to minimize the emissions, if any, resulting from the breakdown;
  - (VIII) A description of the corrective measures undertaken and/or to be undertaken to avoid such a breakdown in the future; and
  - (IX) Pictures of any equipment which failed, if available.
- (iii) Within 15 days of the end of each calendar quarter, the operator shall submit to the Executive Officer a report that lists each occurrence of a breakdown, fault, malfunction, alarm, engine or control system operating parameter out of the acceptable range established by an I&M plan or permit condition, or an emission check that finds excess emissions. Such report shall be in a District-approved format, and for each incident shall identify the time of the incident, the time the operator learned of the incident, specific location, equipment involved, responsible party to contact for further information, to the extent known the causes of the event, the time and description of corrective actions, including shutting an engine down, and the results of all portable analyzer NO<sub>x</sub> and CO emissions checks done before or after the corrective actions. The operator shall also report if no incidents occurred.

(2) Portable engines:

The operator of any portable engine shall maintain a monthly engine operating log that includes:

- (i) Total hours of operation; or
- (ii) Type of liquid and/or type of gaseous fuel; and
- (iii) Fuel consumption (cubic feet of gas and gallons of liquid).

Facilities subject to Regulation XX may maintain a quarterly log for engines that are designated as a process unit on the facility permit.

(3) Recordkeeping for All Engines

All data, logs, test reports and other information required by this rule shall be maintained for at least five years and made available for inspection by the Executive Officer.

(g) Test Methods

Testing to verify compliance with the applicable requirements shall be conducted in accordance with the test methods specified in Table VIII, or any test methods approved by CARB and EPA, and authorized by the Executive Officer.

TABLE VIII TESTING METHODS	
Pollutant	Method
NO <sub>x</sub>	District Method 100.1
CO	District Method 100.1
VOC	District Method 25.1* or District Method 25.3*

\* Excluding ethane and methane

A violation of any standard of this rule established by any of the specified test methods, or any test methods approved by the CARB or EPA, and authorized by the Executive Officer, shall constitute a violation of this rule.

**(h) Alternate Compliance Option**

**(1) In lieu of complying with the applicable emission limits by the effective date specified in Table III-B, owners or operators of biogas-fired units that operate under long term fixed price power purchase agreements that have been entered into prior to February 1, 2008 and extend beyond January 1,**

2016 may elect to defer compliance by up to two years and no later than January 1, 2018, provided the owner or operator:

- (A) Submits an alternate compliance plan and pays a Compliance Flexibility Fee, as provided for in paragraph (h)(2), to the Executive Officer at least 150 days prior to the applicable compliance date in Table III-B, and
- (B) Maintains on-site a copy of verification of Compliance Flexibility Fee payment and AQMD approval of the alternate compliance plan that shall be made available upon request to AQMD staff.

(2) Plan Submittal

The alternate compliance plan submitted pursuant to paragraph (h)(1) shall include:

- (A) A completed AQMD Form 400A with company name, AQMD Facility ID, identification that application is for a compliance plan (Section 7a of form), and identification that request is for Rule 1110.2 Compliance Flexibility Fee option (Section 9 of form);
- (B) Attached documentation of unit permit ID, unit rated brake horsepower (bhp), and fee calculation;
- (C) Proof that the power purchase agreement was entered into prior to February 1, 2008 and extends beyond January 1, 2016.
- (D) Filing Fee payment; and
- (E) Compliance Flexibility Fee payment as calculated by the following equation:

$$CFF = bhp \times R \times Y$$

Where,

CFF = Compliance Flexibility Fee, \$

bhp = rated brake horsepower of unit

R = Fee Rate = \$47 per brake horsepower per year

Y = Number of years (up to 2 years for engines required to comply by January 1, 2016).

(3) Usage of Compliance Flexibility Fee funds

The funds collected from the Compliance Flexibility Fee will be applied to AQMD NOx reduction programs pursuant to protocols approved under District rules.

**(i)** Exemptions

The provisions of subdivision (d) shall not apply to:

- (1) All orchard wind machines powered by an internal combustion engine.
- (2) Emergency standby engines, engines used for fire-fighting and flood control, and any other emergency engines approved by the Executive Officer, which have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter, and agricultural emergency standby engines that are exempt from a District permit and operate 200 hours or less per year as determined by an elapsed operating time meter.
- (3) Laboratory engines used in research and testing purposes.
- (4) Engines operated for purposes of performance verification and testing of engines.
- (5) Auxiliary engines used to power other engines or gas turbines during start-ups.
- (6) Portable engines that are registered under the state registration program pursuant to Title 13, Article 5 of the CCR.
- (7) Nonroad engines, with the exception that subparagraph (d)(2)(A) shall apply to portable generators.
- (8) Engines operating on San Clemente Island; and engines operated by the County of Riverside for the purpose of public safety communication at Santa Rosa Peak in Riverside County, where the site is located at an elevation of higher than 7,400 feet above sea level and is without access to electric power and natural gas.
- (9) Agricultural stationary engines provided that:
  - (A) The operator submits documentation to the Executive Officer by the applicable date in Table V when permit applications are due that the applicable electric utility has rejected an application for an electrical line extension to the location of the engines, or the Executive Officer determines that the operator does not qualify, due to no fault of the operator, for funding authorized by California Health and Safety Code Section 44229; and
  - (B) The operator replaces the engines, in accordance with the compliance schedule of Table IX, with engines certified by CARB

to meet the Tier 4 emission standards of 40 CFR Part 1039 Section 1039.101, Table 1. These Tier 4 replacement engines shall be considered to comply with Best Available Control Technology; and

- (C) The operator does not operate the Tier 4 engines in a manner that exceeds the not-to-exceed standards of 40 CFR Section 1039.101, Paragraph (e), as determined by the test methods of subdivision (g) of this rule.

<b>TABLE IX COMPLIANCE SCHEDULE FOR INSTALLATION OF NEW TIER 4 STATIONARY AGRICULTURAL ENGINES</b>	
<b>Action Required</b>	<b>Due Date</b>
Submit to the Executive Officer applications for permits to construct engine modifications, control equipment, or replacement engines	March 1, 2013
Initiate construction of engine modifications, control equipment, or replacement engines	September 30, 2013, or 30 days after the permit to construct is issued, whichever is later
Complete construction and comply with applicable requirements	January 1, 2014, or 60 days after the permit to construct is issued, whichever is later
Complete initial source testing	March 1, 2014, or 120 days after the permit to construct is issued, whichever is later

- (10) An engine start-up, until sufficient operating temperatures are reached for proper operation of the emission control equipment, and an engine shutdown period. The ~~start-up~~ periods shall not exceed 30 minutes, unless the Executive Officer approves a longer period not exceeding 2 hours for an engine and makes it a condition of the engine permit.
- (11) An engine start-up, after an engine overhaul or major repair requiring removal of a cylinder head, for a period not to exceed four operating hours.
- (12) The initial commissioning of a new engine for a period specified by permit conditions, provided the operator takes measures to reduce emissions and

the duration of the commissioning to the extent possible. The commissioning period shall not exceed 150 operating hours.



## ATTACHMENT F

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

### **Revised** Draft Staff Report

## **Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines**

**August 2012**

#### **Executive Officer**

Barry R. Wallerstein, D.Env.

#### **Deputy Executive Officer**

Planning, Rule Development, and Area Sources  
Elaine Chang, Dr PH

#### **Assistant Deputy Executive Officer**

Planning, Rule Development, and Area Sources  
Laki Tisopulos, Ph.D., P.E.

#### **Planning and Rules Manager**

Planning, Rule Development, and Area Sources  
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William Wong – Principal Deputy District Counsel

Technical Assistance Alfonso Baez, M.S. – Program Supervisor  
Wayne Barcikowski – Air Quality Specialist

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
GOVERNING BOARD**

Chairman: WILLIAM A. BURKE, Ed.D.  
Speaker of the Assembly Appointee

Vice Chairman: DENNIS YATES  
Mayor, City of Chino  
Cities Representative, San Bernardino County

**MEMBERS:**

MICHAEL D. ANTONOVICH  
Supervisor, Fifth District  
Los Angeles County Representative

JOHN J. BENOIT  
Supervisor, Fourth District  
Riverside County Representative

MICHAEL CACCIOTI  
Council Member, City of South Pasadena  
Cities Representative, Los Angeles County/Eastern Region

CLARK E. PARKER, Ph.D.  
Senate Rules Committee Appointee

JOSIE GONZALES  
Supervisor, Fifth District  
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Mayor, City of Riverside  
Cities Representative, Riverside County

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JUDITH MITCHELL  
Council Member, City of Rolling Hills Estates  
Cities Representative, Los Angeles County/Western Region

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Supervisor, Fourth District  
Orange County Representative

JAN PERRY  
Council Member, City of Los Angeles  
City of Los Angeles

MIGUEL PULIDO  
Mayor, City of Santa Ana  
Cities Representative, County of Orange

**EXECUTIVE OFFICER:**

BARRY R. WALLERSTEIN, D.Env.

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## **EXECUTIVE SUMMARY**

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## EXECUTIVE SUMMARY

The South Coast Air Quality Management District (AQMD) is the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties. AQMD is responsible for controlling emissions primarily from non-vehicular sources of air pollution.

Rule 1110.2 regulates oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compound (VOC) emissions from liquid and gas fueled internal combustion engines operating in the AQMD producing more than 50 rated brake horsepower (bhp). The rule was adopted in 1990 and last amended in 2010 to add an exemption affecting a remote public safety communications site.

The amendment in 2008 set concentration limits for landfill and digester gas-fired engines to become effective on July 1, 2012, subject to a Technology Assessment. The biogas emission standards adopted in 2008, except for CO, were equivalent to the current Best Available Control Technology (BACT) standard. Biogas engines regulated by this rule include approximately 55 engines operated by 13 public and private operators of landfills and wastewater treatment plants. The rule and the adopting resolutions directed staff to conduct and complete a Technology Assessment before July 2010 to confirm the achievability of the July 1, 2012 compliance limits for biogas engines. If the Technology Assessment could not confirm the 2012 limits' achievability, the 2012 limits would not be treated as effective.

District staff presented an Interim Report on the Technology Assessment for Rule 1110.2 Biogas Engines to the Governing Board in July 2010. The report pointed to two potential technologies that were a part of demonstration projects in the basin. However, the permit moratorium in 2009 caused a delay in the startup of these projects. One pilot study has since been successfully completed, but the other demonstration project's startup and completion has been affected by other unforeseen delays. The Interim Technology Assessment mentioned the possible necessity of an adjustment to the July 1, 2012 effective date to facilitate the completion of the technology assessment and implementation of the 2008 amendment.

The proposed amendments will:

- Re-establish the effectiveness of the previously adopted 2012 limits. Allow biogas engine operators ~~three to four~~ three and a half more years to comply with the 2012 emission limits. The new effective date will be ~~January~~ July 1, 2016~~5~~ for all biogas engines. ~~the first engine or a biogas cleanup system for the entire biogas engine fleet. The remaining engines will have an additional year to comply.~~
- Provide a compliance option with a longer averaging time to engine operators that can demonstrate through continuous emission monitoring systems (CEMS) data mass emission levels at least 10 percent lower than allowable under the rule's proposed concentration limits for NO<sub>x</sub> and CO. The feasibility of the lower mass

emissions was demonstrated by the recently completed pilot study by Orange County Sanitation District (OCSD), which indicated that lower NOx mass emissions can be achieved in conjunction with longer averaging times. This longer averaging time would be allowed provided that the CEMS data routinely shows emission levels below 11 ppm for NOx and below 250 ppm for CO.

- Provide an alternate compliance option to give operators under long term fixed price power purchase agreements entered into prior to the February 1, 2008 amendments and extending beyond the January 1, 2016 compliance date additional time (up to two years beyond the compliance date) to comply with the emission limits with the payment of a compliance flexibility fee.
- Biogas engines achieving early compliance (i.e. January 1, 2015) will have their permit application fees refunded.

The project will result in 0.9 tons per day of NOx reductions, 0.5 tons per day of VOC reductions, and 20 tons per day of CO reductions. The range of cost effectiveness using the District model is between \$1,700 and \$3,500 per ton of combined NOx, VOC, and CO reduced (NOx + VOC+ 1/7 CO). Cost effectiveness was calculated based on actual control costs for installations in the Basin and in the Bay Area. Staff also added costs for additional gas cleanup and a 20% capital cost contingency to arrive at an upper cost effectiveness range between \$2,600 and \$5,900 per ton. It should be noted that recently adopted AQMD NOx regulations ranged in cost effectiveness from \$10,000 to \$30,000 per ton.

District staff has met on several occasions with stakeholders and the affected community to discuss the feasibility of the required controls and their cost effectiveness. Staff has also met individually with nearly every affected facility operator to discuss site-specific issues. Information on Selective Catalytic Reduction (SCR)/catalytic oxidation-based after treatment technology from the two projects in this Basin and in the Bay Area to date provides ample evidence in support of the feasibility of the proposed limits and the completion of the Technology Assessment. However, on-going demonstration projects with alternate technologies, if successful, could also provide our stakeholders with additional useful information and alternate compliance routes. Staff intends to continue the technology review efforts with stakeholders even after the completion of this rulemaking process.

## **CHAPTER 1: BACKGROUND**

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**INTRODUCTION**

**REGULATORY HISTORY**

**SILOXANES IN BIOGAS**

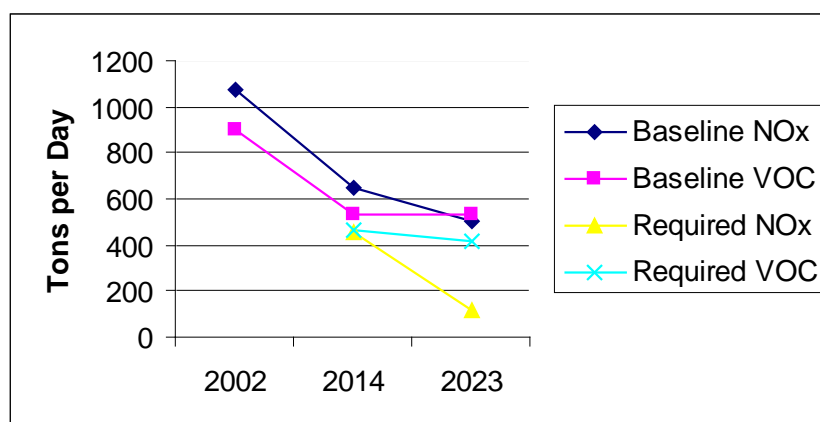
**KEY ISSUES**

**AFFECTED INDUSTRIES**

**PUBLIC PROCESS**

## INTRODUCTION

The California Health and Safety Code requires the AQMD to adopt an Air Quality Management Plan (AQMP) to meet state and federal ambient air quality standards and adopt rules and regulations that carry out the objectives of the AQMP. The California Health and Safety Code also requires the AQMD to implement all feasible measures to reduce air pollution. The 2007 AQMP has found that additional reductions are needed to meet the more stringent federal ozone and particulate matter standards. Reductions in NO<sub>x</sub> will help in maintaining the federal 24-hour average PM<sub>2.5</sub> standard in 2014, while reductions in NO<sub>x</sub> and VOC will aid in attaining the ozone standard in 2023. Figure 1 shows the projected baseline emissions for NO<sub>x</sub> and VOC and the required emissions to achieve the ozone standard in 2023. Further NO<sub>x</sub> and VOC reductions from Rule 1110.2 biogas engines are essential for achieving compliance with federal and state ambient air quality standards for PM<sub>2.5</sub> and ozone.



**Figure 1. NO<sub>x</sub> and VOC Baseline Emissions and Emissions Needed to Achieve the 2023 Ozone Standard**

Engines that are fueled by biogas (landfill or digester gas) make up about 7% of stationary, non-emergency engines in the AQMD. Of all the combustion sources, these engines inherently have the highest emissions. Rule 1110.2, “Emissions from Gaseous- and Liquid-Fueled Engines,” was first adopted in 1990 to address emissions from stationary engines in this category. Since the first adoption of the rule, advances in low NO<sub>x</sub> burner and post combustion control technology have been demonstrated and implemented on several categories of combustion equipment. In contrast, the current NO<sub>x</sub> concentration BACT and rule limits for biogas engines are at least twelve times higher than allowed by AQMD boiler rules.

Projected NO<sub>x</sub> emissions reductions from biogas engines achieving the emissions limits set in the 2008 rule amendment were not included in the State Implementation Plan (SIP)



during the 2008 amendment because they were contingent on the completion of a Technology Assessment. However, sufficient information currently exists for the completion of the Final Technology Assessment to support the current amendment of this rule. As a result, the NO<sub>x</sub> reductions from biogas engines will be incorporated into the SIP to further promote the District's efforts towards the attainment of federal and state PM<sub>2.5</sub> and ozone air quality standards.

## **REGULATORY HISTORY**

Rule 1110.2 – Emissions from Gaseous- and Liquid-Fired Engines was adopted by the AQMD Governing Board on August 3, 1990. It required that either 1) NO<sub>x</sub> emissions be reduced over 90% to one of two compliance limits specified by the rule, or; 2) the engines be permanently removed from service or replaced with electric motors. It was amended in September 1990 to clarify rule language and then amended in August and December of 1994 to modify the CO monitoring requirements and to clarify rule language. The amendment of November 1997 eliminated the requirement for continuous monitoring of CO, reduced the source testing requirement from once every year to once every three years, and exempted non-road engines, including portable engines, from most requirements. The amendment in June 2005 made the previously exempt agricultural engines subject to the rule.

To address widespread non-compliance with stationary IC engines, the 2008 amendment augmented the source testing, continuous monitoring, inspection and maintenance (I&M), and reporting requirements of the rule to improve compliance. It also required stationary, non-emergency engines to meet emission standards equivalent to current BACT for NO<sub>x</sub> and VOC and almost to BACT for CO. This partially implemented the 2007 AQMP control measure for Facility Modernization (MCS-001). Additionally, the 2008 amendment required new electric generating engines to limit emissions to levels nearly equivalent to large central power plants, meeting standards that are at or near the CARB 2007 Distributed Generation Emissions Standards. It also clarified the status for portable engines and set emissions standards for biogas engines to become effective on July 1, 2012 if the July 2010 Technology Assessment would confirm the achievability of those limits.

The 2008 adopting resolution included commitments directing staff to conduct a Technology Assessment to address the availability, feasibility, cost-effectiveness, compliance schedule, and global warming gas impacts of biogas engine control technologies and report back to the Governing Board no later than July 2010. Additionally, the Governing Board directed that the July 2012 biogas emission limits will not be incorporated into the SIP unless the July 2010 Technology Assessment finds that the proposed limits are achievable and cost-effective.

The most recent amendment in July 2010 added an exemption to the rule affecting a remote public safety communications site at Santa Rosa Peak in Riverside County which has limited accessibility in the wintertime.

At the July 2010 Governing Board meeting, staff presented an Interim Technology Assessment to address the board resolution commitments in 2008. The Interim Technology Assessment summarized the biogas engine control technologies to date and the status of on-going demonstration projects. Due to the delays caused by the permit moratorium in 2009, the release of a subsequent report was recommended upon the completion of these projects. The Interim Technology Assessment concluded that feasible, cost-effective technology should be available that can support the feasibility of the July 2012 emission limits, but that the delay in the demonstration projects will likely necessitate an adjustment to the July 1, 2012 compliance date of Rule 1110.2.

## **SILOXANES IN BIOGAS**

Siloxanes are a type of organosilicon compound that exists in many cosmetic, personal and household products. When disposed, these compounds can end up either at wastewater (sewage) treatment plants or in landfills. It is a well known fact that impurities in the biogas affect engine performance. Once oxidized into silicon dioxide ( $\text{SiO}_2$ ) upon combustion, glass-like siloxane deposits can form on moving engine parts such as valves and pistons. Siloxanes in the biogas are responsible for increased engine maintenance, and have the potential to cause significant damage to internal engine components if not removed either before combustion or during routine maintenance service. Additionally, siloxanes, if untreated and combusted, can foul catalyst-based post-combustion controls and make them much less effective in their pollutant removal potential. Siloxanes that make it out through the engine exhaust stream can deposit themselves on the downstream catalyst's available active sites and thereby reduce the pollutant removal efficiency.

In the Interim Technology Assessment, siloxane data was obtained from the Southern California Association of Public Treatment Works (SCAP) and showed that there is variability in the siloxane levels at different locations for digester plants and landfills (Table 1).

**Table 1. SCAP Data Showing Siloxane Concentrations in Biogas**

Site	Type of Biogas	Average Siloxane Concentration (ppmv)
Palmdale	Digester	0.9
San Bernardino	Digester	0.9
Fountain Valley	Digester	2.59
Huntington Beach	Digester	2.25
Lancaster	Digester	3.9
RP-1	Digester	5.15
JWPCP	Digester	5.31
Hyperion	Digester	8.51
Calabasas	Landfill	0.34
Spadra	Landfill	0.51
Puente Hills	Landfill	3.3

From the data obtained in the Interim Report, the time average siloxane concentration ranges for digester and landfill gas are as follows:

Digester Gas: 0.26 – 9.7 ppmv

Landfill Gas: 0.1 – 3.3 ppmv

During discussions with stakeholders, some have reported levels below 10 ppmv, while others have reported siloxane levels of above 100 ppmv. Regardless of the inlet siloxane level of the biogas, a treatment system capable of handling the baseline level and spikes is absolutely critical to preserve engine and catalyst control system performance.

## KEY ISSUES

From ongoing meetings with the affected stakeholders in the Biogas Technology Advisory Committee, staff has summarized key issues that have resulted from those discussions.

1. *Cost of Biogas Cleanup.* The capital and operating costs for cleaning up the biogas are very high, especially for those applications that have variable and elevated siloxane levels.
2. *Space Requirements.* Some facility owners and operators may have to build ancillary structures, such as elevated platforms, to accommodate the control equipment which increases the installation costs. This is due to specific site constraints with existing equipment and structures.

3. *Cost of Exhaust Gas Cleanup.* Post-combustion control technologies such as Catalytic Oxidation and Selective Catalytic Reduction (SCR) are expensive to install and operate.
4. *Contracted Facilities.* Some facility operators only lease the gas supplied by a landfill and combust the gas for power production. These entities allege that they are bound by power purchase agreements that may prevent them from installing control equipment to reduce emissions within the next few years.
5. *Life of Landfill Operations/Equipment.* The volume and quality of landfill gas decreases once the landfill ceases to accept municipal solid waste. Some facilities have expressed concerns that by the time the proposed limits become effective, the gas quality will not be sufficient to utilize an engine. These operators feel that they should not retrofit equipment that will be placed out of service within a short time frame.
6. *Selling Gas to Pipeline.* Although it is not currently allowed in the state of California, producing pipeline-quality gas from landfill gas can be a possibility in the future through changes in state regulations (If this is the case, then there will be no utilization of engines and will consist of extensive gas cleanup only).
7. *Flaring as an Option.* Stakeholders have said that if the control technologies are too expensive, they will be left with no viable alternative but to shut down the engines and flare the biogas.

Responses to these comments are presented in Attachment B.

## **AFFECTED INDUSTRIES**

Rule 1110.2 applies to stationary and portable reciprocating internal combustion engines (ICEs) over 50 brake horsepower (bhp). PAR 1110.2 affects the subset that contains engines fueled with biogas, which are those that are operated by landfills and wastewater treatment plants. Biogas engines are lean-burn engines that operate similarly to lean-burn natural gas-fired engines with a higher level of exhaust oxygen.

Landfills produce gas that results from the breakdown of municipal solid waste. This gas is primarily composed of methane and carbon dioxide. The gas is collected in a series of wells that transports it via pipeline to the landfill gas fired engines. The collected landfill gas fires one or more biogas engines with or without supplementation of natural gas.

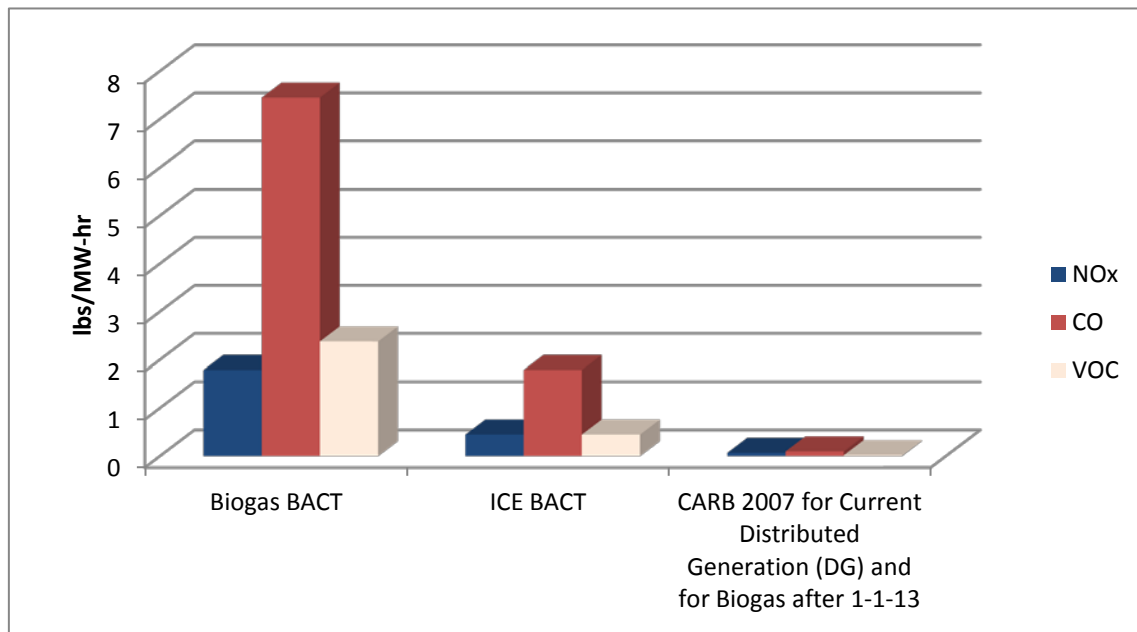
Wastewater treatment plants produce digester gas from the plant's digesters. A digester uses heat and bacteria in an oxygen-free (anaerobic) environment to break down sewage sludge. A by-product of this process is biogas that contains methane. This biogas also fires one or more biogas engines with or without supplementation of natural gas. An advantage with using ICEs at wastewater treatment plants is that these are combined heat

and power (CHP) units. The waste heat created by the engine can be recovered and used to heat the plant’s digesters, resulting in energy savings.

Whether coming from a landfill or an anaerobic digester, the biogas is used to fire an internal combustion engine with a generator to produce electricity. Some facilities are self-generating facilities that use the electricity to power their processes internally. Others sell off this generated power to the local utility grid. The wastewater treatment plants are primarily operated by public entities and utilities, while the landfills are operated by either public or private operators. There are a total of 8 public operators and 5 five private operators for biogas engines in the South Coast Basin.

There are 55 biogas engines operating in the Basin. Of these engines, 27 are digester gas-fueled and 28 are landfill gas-fueled. These engines are operated by 13 independent operators at 22 locations (6 operate digester gas-fueled engines and 7 operate landfill gas-fueled engines).

Despite past efforts to reduce emissions, biogas-fueled engines remain the dirtiest in terms of mass per unit power produced in the Basin, even though they are fired with renewable fuel. Even at BACT, these engines pollute significantly more than large central generating stations on a pound per megawatt-hour basis (Figure 2). For biogas ICEs, the NOx emissions are over 25 times higher than those of central power plants, 119 times higher for VOC, and 75 times higher for CO.



**Figure 2. Current BACT for Biogas ICEs and Natural Gas ICEs vs. Central Generating Station BACT**

During the 2010 Interim Technology Assessment, approximately 66 engines fueled by biogas were identified. Since that time, however, the number has decreased to 55 due to some engines being placed out of service. Nonetheless, the remaining biogas engines are among the top NO<sub>x</sub> emitters amongst stationary, non-emergency engines. Table 2 lists the top 25 NO<sub>x</sub> emitters based on annual reporting data for 2010. In this table, 13 of the 25 top NO<sub>x</sub> emitters in the basin are biogas-powered stationary, non-emergency engines. Forty-three percent of the NO<sub>x</sub> emissions in this table come from the 13 biogas engines. The remaining non-biogas facilities are now subject to the current Rule 1110.2 limits.

**Table 2. “Top 25” Facilities with Highest NOx Emissions from Stationary, Non-Emergency Engines (Pounds per Year) in 2010**

Facility	ID No.	NOx	ROG	CO	Fuel(s)
U.S. GOVT, DEPT OF NAVY	800263	110,713	8,967	24,390	Diesel
U.S. GOVT, DEPT OF NAVY	800263	80,714	9,701	26,387	Diesel
EXXONMOBIL OIL CORPORATION	800089	69,961	5,594	15,215	Diesel
<b>LA COUNTY SANITATION DISTRICT- PUENTE HILLS</b>	<b>25070</b>	<b>52,796</b>	<b>18,068</b>	<b>284,104</b>	<b>Landfill Gas</b>
<b>ORANGE COUNTY SANITATION DISTRICT</b>	<b>29110</b>	<b>48,912</b>	<b>68,945</b>	<b>611,663</b>	<b>Digester Gas</b>
<b>ORANGE COUNTY SANITATION DISTRICT</b>	<b>17301</b>	<b>41,478</b>	<b>43,767</b>	<b>426,682</b>	<b>Digester Gas</b>
U.S. GOVT, DEPT OF NAVY	800263	38,469	3,827	10,408	Diesel
CRIMSON RESOURCE MANAGEMENT	142517	38,093	507	64,119	Natural Gas (Rich-Burn)
<b>MM LOPEZ ENERGY LLC</b>	<b>104806</b>	<b>35,662</b>	<b>10,707</b>	<b>142,482</b>	<b>Landfill Gas</b>
<b>MM PRIMA DESHECHA ENERGY, LLC</b>	<b>117297</b>	<b>32,599</b>	<b>6,321</b>	<b>127,325</b>	<b>Landfill Gas</b>
<b>MM PRIMA DESHECHA ENERGY, LLC</b>	<b>117297</b>	<b>31,474</b>	<b>14,005</b>	<b>141,724</b>	<b>Landfill Gas</b>
EXXONMOBIL OIL CORPORATION	800089	28,192	2,254	6,131	Diesel
<b>MM LOPEZ ENERGY LLC</b>	<b>104806</b>	<b>28,189</b>	<b>11,753</b>	<b>110,606</b>	<b>Landfill Gas</b>
U.S. GOVT, DEPT OF NAVY	800263	21,923	2,181	5,931	Diesel
EOP - 10960 WILSHIRE LLC	119133	20,083	267	33,805	Natural Gas (Rich-Burn)
HOLLYWOOD PARK LAND COMPANY LLC	145829	19,792	1,583	4,304	Diesel
SAMUEL P LEWIS DBA CHINO WELDING & ASSEM	150351	19,542	260	32,894	Natural Gas (Rich-Burn)
<b>TOYON LANDFILL GAS CONVERSION LLC</b>	<b>142417</b>	<b>18,000</b>	<b>9,991</b>	<b>100,575</b>	<b>Landfill Gas</b>
ORANGE, COUNTY OF - SHERIFF DEPT, FAC OP	72525	17,314	499	1,344	Natural Gas (Lean-Burn)
<b>BREA PARENT 2007, LLC</b>	<b>113518</b>	<b>17,033</b>	<b>1,099</b>	<b>4,555</b>	<b>Landfill Gas</b>
HUNTINGTON BEACH CITY, WATER DEPT	20231	15,370	205	25,871	Natural Gas (Rich-Burn)
<b>BREA PARENT 2007, LLC</b>	<b>113518</b>	<b>15,346</b>	<b>784</b>	<b>3,140</b>	<b>Landfill Gas</b>
<b>BREA PARENT 2007, LLC</b>	<b>113518</b>	<b>14,181</b>	<b>1,052</b>	<b>4,958</b>	<b>Landfill Gas</b>
<b>WASTE MGMT DISP &amp; RECY SERVS INC (BRADLEY)</b>	<b>50310</b>	<b>13,934</b>	<b>3,465</b>	<b>60,087</b>	<b>Landfill Gas</b>
<b>WASTE MGMT DISP &amp; RECY SERVS INC (BRADLEY)</b>	<b>50310</b>	<b>13,839</b>	<b>3,823</b>	<b>67,514</b>	<b>Landfill Gas</b>
<b>TOTALS, PPY</b>		<b>843,607</b>	<b>229,624</b>	<b>2,336,216</b>	
<b>TOTALS, TPY</b>		<b>421.8</b>	<b>114.8</b>	<b>1,168.1</b>	
<b>TOTALS, TPD</b>		<b>1.16</b>	<b>0.31</b>	<b>3.20</b>	

## PUBLIC PROCESS

Since the 2008 amendment, staff has held eight Biogas Technology Advisory Committee Meetings with representatives from affected facilities, manufacturers, consultants and other interested parties. The Biogas Technology Advisory Committee was part of the ongoing commitment to finalize the Technology Assessment for biogas engines. In October 2010 staff met with the regulated community to discuss cost issues related to the emission standard adopted as part of the 2008 amendment. Since the July 2010 Interim Report, the Biogas Technology Advisory Committee met in September 2011, January 2012, April 2012, ~~and~~ May 2012, and August 2012. Two Public Workshops were held in February 2012 and April 2012. Staff also has had several meetings with control equipment vendors and also manufacturers of emerging technologies that may provide an alternative to electrical power generation by traditional internal combustion methods. In addition, staff has met individually with nearly every biogas facility operator to discuss site-specific issues, technologies, long-term plans for existing biogas engines, and costs. Several site visits were also conducted by staff at affected facilities.



## **CHAPTER 2: CONTROL TECHNOLOGIES**

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**INTRODUCTION**

**BIOGAS CLEANUP**

**CATALYTIC OXIDATION/SELECTIVE CATALYTIC REDUCTION**

**NOXTECH**

**ALTERNATIVE TECHNOLOGIES**

## **INTRODUCTION**

Controlling emissions for lean-burn biogas engines has many challenges. Fortunately, the same add-on control technologies used in the control of lean-burn natural gas engines can be employed in biogas engines with proper fuel pretreatment. Additionally, other technologies have emerged that have been shown to result in emissions well below the proposed rule limits.

The Final Technology Assessment attached to this staff report summarizes staff's findings to date regarding the feasibility of the biogas engine emission limits. Data collected from a completed demonstration project in the Basin and from a landfill in the Bay Area provides substantial evidence in support of the proposed emission limits for biogas engines. In addition to feasibility, the Final Technology Assessment also includes cost-effectiveness, compliance schedule, global warming impacts, and the impacts of potential flaring. The Final Technology Assessment provides a complete description of the control technologies for this amendment, and is presented as an attachment to this document (Attachment A). What follows is a summary of the technologies discussed in the Technology Assessment.

## **BIOGAS CLEANUP**

As mentioned in the previous section, the cleanup of the inlet fuel for biogas engines can serve two purposes: longer operating time with less engine maintenance and protection of post-combustion catalysts from impurities. Methylated siloxanes in the biogas are a chief contributor to catalyst fouling and increased engine maintenance. The 2008 Interim Technology Assessment concluded that an engine with a gas cleanup system capable of effectively removing siloxanes can protect post-combustion catalysts and make multi-pollutant reductions feasible. Although the levels of siloxanes can vary by facility, a properly designed system can perform effectively to remove siloxanes as well as many other impurities such as moisture, particulates, VOCs and sulfur compounds. Two installations in California have shown that gas cleanup can protect catalysts and lower engine maintenance costs. The installations at Ox Mountain Landfill in the Bay Area and at the Orange County Sanitation District (OCSD) utilize gas cleanup systems and post-combustion catalytic control systems that have resulted in favorable reductions in NO<sub>x</sub>, VOC, and CO, while performance data demonstrates effective siloxane removal and protection of post-combustion catalysts. There are two main types of systems for siloxane removal, regenerative and non-regenerative. Ox Mountain uses a regenerative system, while OCSD relies on a non-regenerative system. However, the gas cleanup systems at both Ox Mountain and OCSD use activated carbon as the adsorption media for the gas impurities. The difference is that Ox Mountain heats the carbon and purge gas in a regenerative cycle to "reactivate" the carbon whereas OCSD simply replaces the spent media with fresh activated carbon.

## **CATALYTIC OXIDATION/SELECTIVE CATALYTIC REDUCTION**

A technology that has been around for many years for natural gas ICE after-treatment is catalytic oxidation and selective catalytic reduction (SCR). Catalytic oxidation removes VOC and CO from the exhaust stream while SCR removes NO<sub>x</sub> with the use of urea injection. This technology is most effective in lean-burn engines. Before effective gas cleanup became available, catalyst poisoning was a problematic issue with this application for biogas engines. The pilot study at OCSD and the installation at Ox Mountain both used these two technologies in conjunction with biogas cleanup for removal of NO<sub>x</sub>, VOC, and CO. The results from OCSD's pilot demonstration and Ox Mountain show that the proposed rule's emission limits are achievable on a consistent basis. Source test and CEMS data from both installations show that properly cleaned biogas does not foul or poison the oxidative and SCR catalysts, ensuring reliable multi-pollutant removal.

## **NOXTECH**

NOxTech is a selective non-catalytic reduction control technology that treats the exhaust stream of IC engines, reduces NO<sub>x</sub>, VOC, and CO, and does not require gas cleanup. In the NOxTech system the exhaust gases are heated to a temperature that incinerates VOC and CO without generating thermal NO<sub>x</sub>, and then removes exhaust NO<sub>x</sub> using urea injection. Eastern Municipal Water District (EMWD) installed a NOxTech unit at a facility that operates three natural gas engines. The facility is currently operating the NOxTech system, but experienced some setbacks due to the high heat and rapid combustion created from the natural gas engine exhaust. An enhanced system with exhaust gas recirculation (EGR) has been installed and preliminary data has shown that the NO<sub>x</sub> limits are achievable. Further optimization is currently underway to establish consistent results. This system has the possibility of being less costly than the oxidation catalyst/SCR system because of potentially lower operations and maintenance costs, plus the added benefit of not requiring the high capital outlay of an inlet biogas cleanup system. It should be noted that the benefits of biogas treatment to engine wear and maintenance are forgone if a facility solely relies on NOxTech.

## **ALTERNATIVE TECHNOLOGIES**

Other technologies exist that can be used in place of ICEs and are capable of producing much lower emission profiles. Fuel cells are capable of producing power electrochemically while producing near zero emissions. Fuel cells are sensitive to impurities; therefore, a gas cleanup system is essential. There are many fuel cell installations all over California running on anaerobic digester gas, including five in the South Coast Basin at wastewater treatment facilities.

Flex Energy combines regenerative thermal oxidation with microturbine technology for power production with near zero emissions. This system is especially applicable to facilities that produce low methane biogas, such as closed landfills. One system is operating at a military base in Georgia and a second is targeted to become operational in Orange County this year. This system does not require gas cleanup and can continue to provide power many years after a landfill closes and its methane production drops off.

Hydrogen Assisted Lean Operation, or HALO, is an emerging technology that involves the injection of hydrogen gas into the biogas fuel stream before combustion. This enrichment of hydrogen improves the lean limit combustion stability of the fuel, resulting in lower pollutant emissions. This technology is set to be tested and demonstrated at a wastewater treatment facility in the Basin.

Other combustion technologies such as gas turbines, microturbines, and boilers are also capable of producing power and have lower emission profiles than IC engines. Several facilities in the Basin already use these technologies as the sole source of power production or as a supplemental source to IC engines. Turbines and microturbines require gas cleanup, while boilers are less sensitive to impurities in the biogas.

### **SELF-GENERATING INCENTIVES**

The California Public Utilities Commission (CPUC) offers incentives for facilities that produce at least 75% of their power from renewable fuels, such as biogas, and use that electricity to power internal operations. The Self-Generation Incentive Program (SGIP) provides incentives that can aid in offsetting some of the capital costs from biogas projects. As of November 2011, a \$2.00 per Watt biogas incentive has been offered that can be added to other incentives based on the type of technology used, such as fuel cells, gas turbines, microturbines and IC engines. For example, the combined heat and power (CHP) fuel cell incentive is \$2.25 per Watt, so if combined with the biogas incentive, the total incentive is \$4.25 per Watt. So for a 1 MW CHP fuel cell installation running on biogas, the incentive would amount to 4.25 million dollars. The incentives are also contingent on the facilities meeting specific capacity factors and not exporting more than 25% of the power produced to the grid.

## **CHAPTER 3: SUMMARY OF PROPOSED RULE 1110.2**

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### **PROPOSED AMENDED RULE REQUIREMENTS**

## PROPOSED AMENDED RULE REQUIREMENTS

The key proposed amendments can be summarized as follows:

- Re-establish the effectiveness of the previously adopted 2012 limits. Allow biogas engine operators ~~three and a half~~<sup>three</sup> more years to comply with the 2012 emission limits. The new effective date will be ~~January~~<sup>July</sup> 1, 201~~6~~<sup>5</sup> for all biogas engines.~~the first engine or a biogas cleanup system for the entire biogas engine fleet. The remaining engines will have an additional year to comply.~~
- Provide a compliance option with a longer averaging time to engine operators that can demonstrate through continuous emission monitoring (CEMS) data mass emission levels at least 10 percent lower than allowable under the rule's proposed concentration limits.
- Provide an alternate compliance option to give operators under long term fixed price power purchase agreements entered into prior to the February 1, 2008 amendments and extending beyond the January 1, 2016 compliance date additional time for engine retrofits beyond the proposed compliance date (up to two years) with the payment of a compliance flexibility fee.

The feasibility of the lower mass emissions was demonstrated by the recently completed pilot study by OCSD, which indicated that lower mass emissions can be achieved in conjunction with longer averaging times. This longer averaging time would be allowed provided that the CEMS data routinely shows NO<sub>x</sub> emission levels below 11 ppm (the proposed standard).

To reflect the additional time needed to complete the Final Technology Assessment, District staff is proposing to allow biogas engine operators more time for compliance with the emission limits adopted in the 2008 amendment. Subparagraph 1110.2(d)(1)(C) establishes the emission standards for biogas engines, specifies the effective dates for the emission limits, and provides the compliance schedule for all biogas engines, as listed in Table 3 on the next page. The table is split into two parts: The first part reflects the currently effective limits and the second part establishes the ~~3 to 4~~ three and a half year delay of the 2012 effective date limits for compliance. ~~For operators planning to add engine controls that do not require gas cleanup (i.e. NO<sub>x</sub>Tech, H<sub>2</sub> injection), the first engine will have to comply by July 1, 2015, while the remaining engines will have one additional year to comply. For operators planning to add engine controls that do require biogas cleanup (oxidation catalyst/SCR), the biogas cleanup system servicing the entire biogas engine fleet will have to be installed by July 1, 2015, while the catalytic aftertreatment controls for all the engines will have to be installed by July 1, 2016.~~

**Table 3. Proposed Concentration Limits for Biogas Engines**

<b>CONCENTRATION LIMITS FOR LANDFILL AND DIGESTER GAS (BIOGAS)-FIRED ENGINES</b>		
<b>NO<sub>x</sub> (ppmvd)<sup>1</sup></b>	<b>VOC (ppmvd)<sup>2</sup></b>	<b>CO (ppmvd)<sup>1</sup></b>
bhp ≥ 500: 36 x ECF <sup>3</sup>	Landfill Gas: 40	2000
bhp < 500: 45 x ECF <sup>3</sup>	Digester Gas: 250 x ECF <sup>3</sup>	
<b><u>CONCENTRATION LIMITS</u></b> <b><u>EFFECTIVE JANUARY 1, 2016</u></b>		
<b><u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u></b>	<b><u>VOC (ppmvd)<sup>2</sup></u></b>	<b><u>CO (ppmvd)<sup>1</sup></u></b>
<b><u>11</u></b>	<b><u>30</u></b>	<b><u>250</u></b>
<b><del>CONCENTRATION LIMITS AND COMPLIANCE SCHEDULE FOR LANDFILL AND DIGESTER GAS (BIOGAS)-FIRED ENGINES</del></b>		
<b>Category</b>	<b>Limit</b>	<b>Unit(s) Shall be in Full Compliance on or before</b>
<b>First Engine or Biogas Cleanup System for entire Biogas engine fleet</b>	<b>NO<sub>x</sub> (ppmvd)<sup>1</sup>: 11</b> <b>VOC (ppmvd)<sup>2</sup>: 30</b>	<b>July 1, 2015</b>
<b>Remaining Engine(s)</b>	<b>CO (ppmvd)<sup>1</sup>: 250</b>	<b>July 1, 2016</b>

- <sup>1</sup> Parts per million by volume, corrected to 15% oxygen on a dry basis and averaged over 15 minutes.
- <sup>2</sup> Parts per million by volume, measured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.
- <sup>3</sup> ECF is the efficiency correction factor.

The subparagraph in Rule 1110.2(d)(1)(C) that reads:

“The concentration limits effective on or after July 1, 2012 shall become effective provided the Executive Officer conducts a technology assessment

that confirms that the limits are achievable, and reports to the Governing Board by July 2010, at a regularly scheduled public meeting,”

will be removed due to the two year delay of the emission limit effective date for biogas engines, and the subparagraph’s expired applicability.

Staff is proposing the following restructuring of paragraph (d)(1) to improve its readability. Subparagraph (d)(1)(D) is added to contain a provision that does not allow a biogas engine to operate in a manner that exceeds the emission limits in (d)(1)(C).

Subparagraph (d)(1)(E) provides an incentive for operators that achieve early compliance. Specifically, if a biogas engine achieves compliance by no later than January 1, 2015, that engine’s permit application fees will be refunded to the owner or operator. It must be established to the satisfaction of the Executive Officer that a biogas engine is complying with the emission limits in Table III-B.

Subparagraph (d)(1)(~~FE~~) will specify the provision for the percentage of natural gas burned. This provision was relocated from subparagraph (d)(1)(C) of the current rule. Once a biogas engine complies with the proposed emission standards, the 10% natural gas limit will no longer apply.

Subparagraph (d)(1)(~~GF~~) will contain the exception for low-usage engines since it is not cost-effective to add controls to these units. This provision was also relocated from subparagraph (d)(1)(C) of the current rule.

Subparagraph (d)(1)(~~HG~~) will contain a provision for operators requiring a longer averaging time.

“An operator of a biogas engine may determine compliance with the NO<sub>x</sub> and/or CO limits of Table III-B by utilizing a longer averaging time as set forth below, provided the operator demonstrates through CEMS data that the engine is achieving a concentration at or below 9.9 ppmv for NO<sub>x</sub> and 225 ppmv for CO (if CO is elected for averaging), ~~(each corrected to 15% O<sub>2</sub>)~~, over a 4 month time period. An operator may utilize a monthly fixed interval averaging time for the first 4 months of engine operation and up to a ~~12-24~~ hour fixed interval averaging time thereafter.”

As evidenced by the demonstration project by Orange County Sanitation District (OCSD), there were occasional spikes in the NO<sub>x</sub> CEMS readings that were above the 11 ppm limit. This occurred approximately 0.9% of the time. To ensure compliance with the proposed limits, staff is proposing to allow biogas engine operators a longer averaging time beyond 15 minutes. However, this is contingent on the performance of the control equipment determined by a CEMS. The longer averaging time will be allowed if the NO<sub>x</sub> and/or CO emissions are at least 10% below what is allowable (at or below a concentration of 9.9 ppmv for NO<sub>x</sub> and 225 ppmv for CO). For the first four months of operation, a monthly averaging time will be allowed for the purposes of equipment optimization. After four months, a twenty four~~twelve~~ hour averaging time can



be implemented to demonstrate compliance. The longer averaging periods are fixed interval (or block) averages, not rolling averages. The longer averaging time may be used only if an engine is achieving the NO<sub>x</sub> and/or CO emission levels (9.9 ppmv and 225 ppmv, respectively) averaged over a 4 month period.

~~Since Rule 1110.2 does not require a CO CEMS on lean-burn engines, the requirements of subparagraph (d)(1)(H) apply to CO only if a biogas engine operator elects to install a CO CEMS for improved, real-time monitoring (e.g. oxidation catalyst performance). The longer averaging option is not intended to apply to time shared CEMS, since this type of system does not collect data continuously over the required time periods in the proposed rule.~~

To prevent artificial averaging of zero data when, for instance, the engine is not operating, or when the CEMS is undergoing periods of calibration or audit, clause 1110.2(d)(1)(HG)(i) will read:

“For ~~the~~ purposes of determining compliance using a longer averaging time: An operator shall not average data during one-minute periods in which the underlying equipment is not operated or when the CEMS is undergoing periods of calibration or audit zero or calibration checks, cylinder gas audits, or routine maintenance in accordance to the provisions in Rules 218 and 218.1.”

~~The operation of the CEMS shall comply with the existing requirements of Rules 218 and 218.1. Rule 218.1 requires that the data points for CEMS analyzers are to be within 10 and 95 percent of the full span or full scale range. In addition, if any data point falls above 95 percent of the full scale range, that value shall be invalid for quantification. For a biogas engine using a longer averaging time, if a CEMS reading falls above 95 percent of the full scale range while the engine is operating, the invalid data point would not be factored into the longer averaging period. Furthermore, the magnitude of the excursion would be unknown since it is outside the range of the analyzer. To address these excursions, a missing data procedure will be applied to quantify the excursions for inclusion into the calculation of the longer averaging time. Whenever valid CEMS emission data cannot be obtained or recorded, aside from documented malfunctions and breakdowns, a missing data procedure will be applied. For biogas engines, the NO<sub>x</sub> missing data shall use a concentration of 336 ppmv (corrected to 15% O<sub>2</sub>) for every missing time period above 95 percent of the full scale range and the CO missing data shall use a concentration of 7502000 ppmv (corrected to 15% O<sub>2</sub>), if the engine is operating during these excursions. This is equivalent to three times the NO<sub>x</sub> and/or CO emissions limits in Table III-B. If the CEMS cannot obtain data per the requirements of AQMD Rules 218 and 218.1, then the substitute data must be used.~~ Clause 1110.2(d)(1)(HG)(ii) will read:

~~“For purposes of determining compliance using a longer averaging time: An operator shall use substitute CEMS data for all other one minute CEMS data when NO<sub>x</sub> and/or CO emissions data has not been obtained or~~

~~recorded or does not meet the requirements of Rules 218 and 218.1. A concentration of 36 ppmv for NO<sub>x</sub> and 2000 ppmv for CO (each corrected to 15% O<sub>2</sub>) shall be used as substitute data. Notwithstanding the requirements of Rules 218 and 218.1, for one-minute time periods where NO<sub>x</sub> and/or CO CEMS data are greater than 95 percent of the Rule 218.1 Full Scale Range while the underlying equipment is operating, an operator shall use substitute data. A concentration equivalent to 3 times the NO<sub>x</sub> and/or CO emission limits in Table III-B (each corrected to 15% O<sub>2</sub>) shall be used as substitute data.”~~

~~Theis following~~ provision discourages the intentional shutdown of a CEMS for reasons other than valid malfunctions ~~and~~, breakdowns, ~~or inability to meet the requirements of Rules 218 and 218.1.~~ Clause (d)(1)(H)(iii) clearly states that:

~~“The intentional shutdown of a CEMS to circumvent the emission limits of Table III-B while the underlying equipment is in operation shall constitute a violation of this rule.”~~

~~The longer averaging option is not intended to apply to time-shared CEMS, since this type of system does not collect data continuously over the required time periods in the proposed rule. This is stated in clause (d)(1)(H)(iv).~~

~~The revised staff proposal provides some biogas engine operators who have entered into fixed price, long term power purchase agreements with local utilities, prior to the February 1, 2008 amendments that first established the July 2012 biogas engine emission limits, with the option to defer compliance by up to two years from the January 1, 2016 compliance date, up to January 1, 2018 with the payment of a compliance flexibility fee. Subdivision (h) outlines the requirements for the plan submittal and the calculation of the compliance flexibility fee. The fee is based on the Carl Moyer cost effectiveness of \$17,200 per ton and is calculated based on the NO<sub>x</sub> reductions of PAR 1110.2. The total cost per year is divided by the sum brake horsepower (bhp) of all the affected biogas engines to arrive at \$47 per bhp per year. The compliance flexibility fee is calculated by taking the fee rate (\$47/bhp-yr) and multiplying by the rated brake horsepower of the unit and then multiplying by the number of years to defer (1 or 2 years). The fees collected from this alternate compliance option will applied to AQMD NO<sub>x</sub> reduction programs. This alternate compliance option is not available for operators who have entered into long term power purchase agreements following the February 1, 2008 amendments.~~

The proposed amendments will provide biogas engine facilities with additional time to implement the proper controls to meet the emission limits. Biogas operators will also have additional time to explore the use of alternative technologies that do not require the combustion of biogas by internal combustion engines.

Several minor administrative changes were also included to provide clarity with respect to references within the rule. In addition, the following four clarifications, although

minor in nature, necessitate either a change in the rule language or an explanation detailed below.

The first clarification involves adjustments to oxygen sensor set points and the frequency of portable analyzer checks in Rule 1110.2 subclause (f)(1)(D)(iii)(I). In the current rule if an engine is in compliance for three consecutive emission checks without any O<sub>2</sub> set point adjustments, the engine can move up to a monthly testing schedule or test every 750 hours, whichever occurs later. If an engine then encounters a non-compliant emissions test result or if the O<sub>2</sub> sensor is replaced for a rich-burn engine with a three way catalyst, it must revert to the more frequent testing schedule. The objective of periodic monitoring is to prevent non-compliance and the objective of not allowing any O<sub>2</sub> set point adjustments during the emission tests is to prevent circumvention of the rule. However, if an operator is proactively adjusting the O<sub>2</sub> set points as a means of preventing a non-compliant situation, the current construct of the rule would suggest that the operator is still required to return to the more frequent testing schedule. Clearly, the intent of the rule was never to discourage such proactive maintenance approaches. To address this, the portable analyzer testing frequency can remain unchanged if the engine is in compliance before and after the O<sub>2</sub> set point adjustment at the air-to-fuel ratio controller (AFRC). This will maintain compliant operation of the engine without allowing the emissions to reach a non-compliant level, while preventing a reversion to a more frequent testing schedule. The operator must perform an emissions check after the set point adjustment to ensure that the engine is operating in compliance after the set point change. This post-adjustment testing is to be performed notwithstanding the requirements of subclause (f)(1)(D)(iii)(IV), which prohibits any control system tuning within 72 hours prior to an emission check. Subclause 1110.2(f)(1)(D)(iii)(I) will now read:

“If an engine is in compliance for three consecutive emission checks, without any adjustments to the oxygen sensor set points, then the engine may be checked monthly or every 750 engine operating hours, whichever occurs later, until there is a noncompliant emission check or, for rich-burn engines with three-way catalysts, the oxygen sensor is replaced. When making adjustments to the oxygen sensor set points, returning to a more frequent emission check schedule is not required if the engine is in compliance with the applicable emission limits prior to and after the set point adjustments, notwithstanding the requirements of (f)(1)(D)(iii)(IV).”

The second clarification involves the shutdown period for an engine. The current rule provides up to 30 minutes after an engine start-up for non-compliant emissions. Emission control equipment takes about 30 minutes from a cold start-up to attain a proper operating temperature to effectively remove pollutants and achieve compliant results. Engine operators have also experienced a similar situation during a gradual shutdown where there are non-compliant events, specifically documented on those engines equipped with CEMS. Engine operators often need to shut an engine down over a short period of time (typically no more than 30 minutes) to allow it to cool and prevent

unnecessary damage from a hard stop. Under the current rule, many operators have to shut down an engine quickly to prevent non-compliant results and potential enforcement action. To address this issue, the exemption in Rule 1110.2(h)(10) will also include a 30 minute shutdown period in addition to the 30 minute start-up period. The emissions provisions in subdivision (d) shall not apply to:

“An engine start-up, until sufficient operating temperatures are reached for proper operation of the emission control equipment, and an engine shutdown period. The periods shall not exceed 30 minutes, unless the Executive Officer approves a longer period not exceeding 2 hours for an engine and makes it a condition of the engine permit.”

The third clarification also involves an exemption in subdivision (h). Rule 1110.2(h)(11) allows an exemption of emission requirements for four operating hours when starting up an engine after an overhaul or major repair that involves the removal of the cylinder head. During these types of repairs, particles or liquids can be left behind from the engine work and take some time to burn off or expel. If an engine catalyst is in operation during this start-up period, significant damage can result from the operation of the engine. Physical damage to the catalyst can result from the particulates and a decrease in catalyst performance can result from contaminant poisoning. This impact can be immediate or can result in a sooner than expected catalyst replacement, which can become a significant cost to the operator. To prevent this from occurring, it has been noted that the four-hour exemption following an engine overhaul or major repair requiring removal of a cylinder head would also allow the temporary removal of the catalyst to prevent its damage.

The final clarification involves the testing and monitoring provisions in Rule 1110.2(f)(1)(D). Under the current rule, portable analyzer emission checks are performed in accordance to the testing frequency outlined in clause (f)(1)(D)(iii). In the event that a scheduled portable analyzer emission check occurs during the same monitoring period as a regularly scheduled source test per (f)(1)(C), the source test results can be used in lieu of the portable analyzer check. The reference source test methods in subdivision (g) of the rule are more stringent than the portable analyzer test method, so this clarification is being made in this report to prevent redundancy in testing within the same time period.

## **CHAPTER 4: IMPACT ASSESSMENT**

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**EMISSIONS IMPACTS AND COST EFFECTIVENESS**

**INCREMENTAL COST EFFECTIVENESS**

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ANALYSIS**

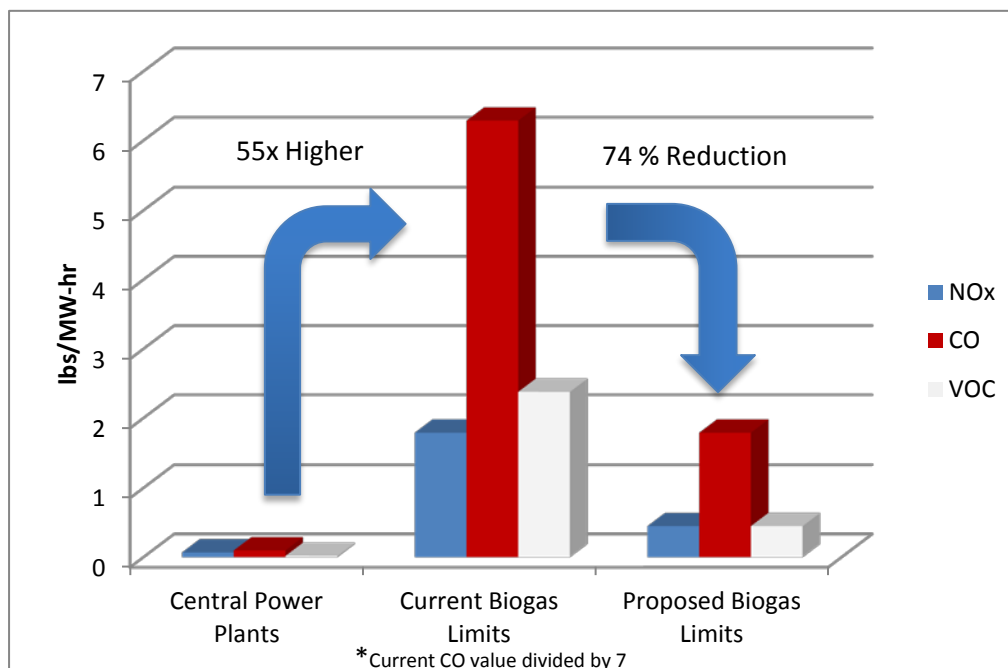
**SOCIOECONOMIC ASSESSMENT**

**DRAFT FINDINGS UNDER CALIFORNIA HEALTH & SAFETY CODE  
SECTION 40727**

**COMPARATIVE ANALYSIS**

## EMISSIONS IMPACTS AND COST EFFECTIVENESS

The proposed amendments will have emissions impacts on biogas engines regulated by Rule 1110.2. Since biogas engines emit significantly more pollutants than natural gas engines and central power plants, the proposed emission standard will reduce NO<sub>x</sub>, VOC, and CO emissions drastically. On an aggregate pollutant basis, current biogas engine emissions are over 55 times higher than those of central power plants. The proposed amendments will result in up to 74% emission reductions (Figure 3).



**Figure 3. Emissions from Biogas ICEs versus Central Power Plants**

The current emissions from biogas engines amount to approximately 1.3 tons per day of NO<sub>x</sub>, 0.8 tons per day of VOC, and 25.6 tons per day of CO. The current emissions are calculated from the current Rule 1110.2 rule limits and permit limits, while the future emissions are calculated from the proposed Rule 1110.2 limits. Permit limits were used for some engines because they were permitted at BACT or have more stringent permit limits than in the current rule. The emission reductions are 0.9 tons per day of NO<sub>x</sub>, 0.5 tons per day of VOC, and 20.0 tons of CO. The reductions will occur in two steps. The first reductions will occur by ~~January~~ July 1, 201~~65~~65 and second step of reductions will occur one to two years later when all biogas engines will comply with the rule limits under the alternate compliance option.

Emissions are calculated for NO<sub>x</sub>, VOC, and CO. The emission reductions for CO are discounted by one seventh because its ozone-formation potential is approximately one seventh from that of NO<sub>x</sub>. For calculating cost effectiveness, the District uses the Discounted Cash Flow (DCF) model, which takes into consideration both capital cost

plus annual operating and maintenance costs. This use of this model is consistent with previous rulemaking proposals and past control measures because it links the cost of the project with its environmental benefits. The equipment is given a twenty year life and a 4% interest rate is applied. The calculated present worth value (PWV) is then divided by the summation of the emission reductions and the length of the project (20 years).

The cost figures submitted by OCSD from their final report were used as a benchmark for evaluating costs for several biogas engine operations. The OCSD data which includes operations for the highest brake horsepower portion of the engine distribution (3,471 bhp) were scaled across different digester and landfill gas engine sizes to estimate installation and operating costs for different engine sizes, ranging from 250 bhp to 4,200 bhp. The non-catalyst installed cost was calculated by using the general chemical engineering cost estimating practice for industrial equipment packages of  $\text{bhp}^{0.6}$ . The other costs were scaled based on brake horsepower alone.

The cost effectiveness was estimated to range from \$1,700 to \$3,500 per ton of NO<sub>x</sub>, VOC, and CO/7 reduced. 8,000 annual operating hours was assumed for the engines. The cost effectiveness was also calculated for a landfill installation with a more expensive regenerative gas cleanup system. These costs were obtained from the Bay Area AQMD for the installation at Ox Mountain Landfill. The cost effectiveness calculated using Ox Mountain's capital and operating costs for the proposed amended rule's emission reductions is \$2,300 per ton of NO<sub>x</sub>, VOC, and CO/7. Staff also calculated cost effectiveness to account for additional gas cleanup and associated contingencies, based on stakeholder feedback. Using vendor quotes for gas cleanup systems, two additional cost effectiveness curves were created reflecting the additional gas cleanup and an added 20% capital cost contingency. The upper cost effectiveness curve has a range from \$2,600 to \$5,900 per ton. The upper and lower (base level) curves create a band that accounts for equipment contingencies. In addition, all of the cost effectiveness calculations reflected a two-year catalyst life to reflect a partial deactivation of OCSD's oxidation catalyst after two years of operation. Although the CO emission levels were elevated and still in compliance with the proposed limit, the calculations were revised to reflect a two-year, instead of a three-year, catalyst life. The cost effectiveness ranges are illustrated in Figure 4 for digester gas engines and Figure 5 for landfill gas engines.

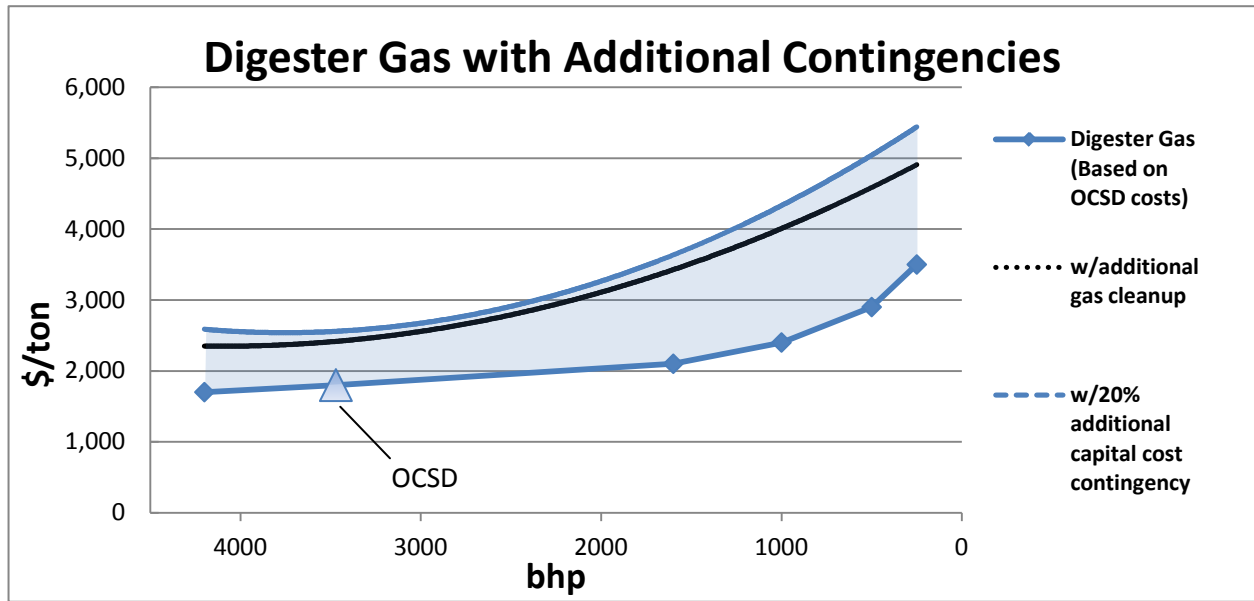


Figure 4. Cost Effectiveness for Digester Gas (Catalytic Aftertreatment)

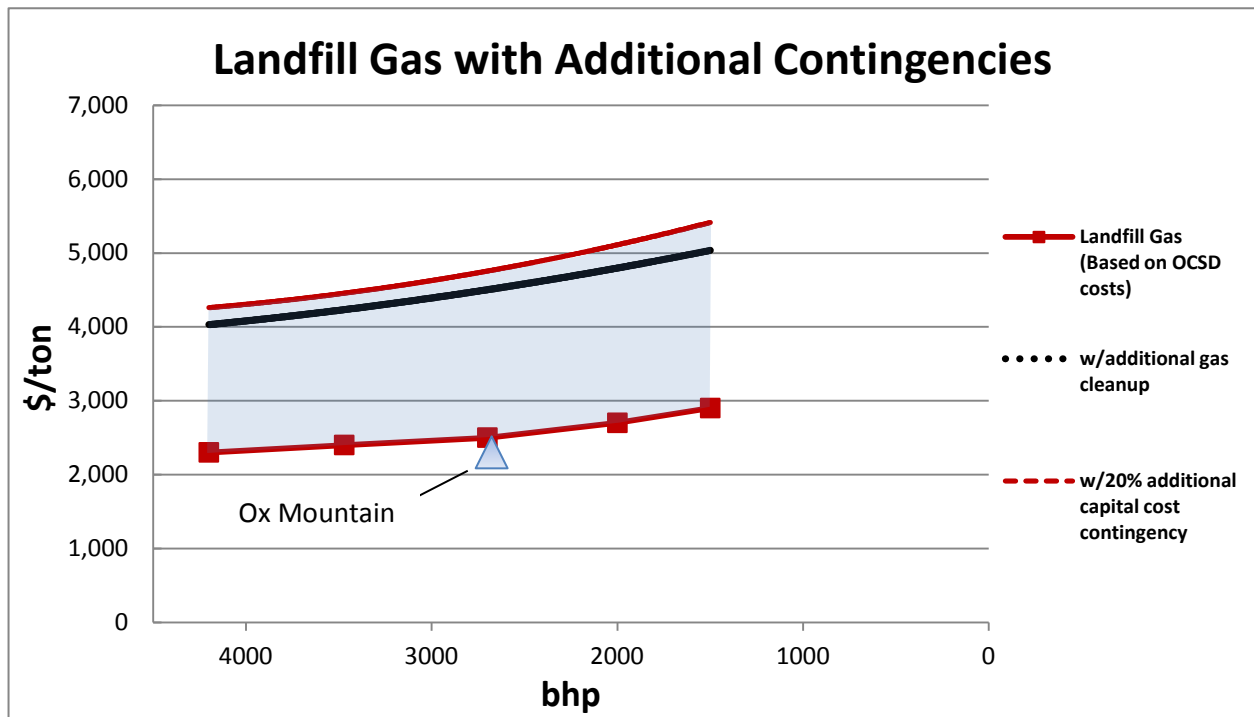


Figure 5. Cost Effectiveness for Landfill Gas (Catalytic Aftertreatment)

For catalytic control technology, the capital cost for the base level scenario on a per engine basis is expected to range from \$417,000 for a 250 bhp engine to \$2,706,000 for a 4,200 bhp engine. The capital cost range with added contingencies is \$494,000 to



\$3,147,000. These ranges represent the capital costs for the smallest engine to the largest in the biogas inventory.

The cost effectiveness estimates are within the costs presented to the Governing Board for past rulemakings. Digester gas and landfill gas engines of all sizes are shown to be cost-effective. The details of the cost effectiveness calculations with a detailed breakdown of the installation and operating costs are presented in the Technology Assessment (Attachments A and B).

## **INCREMENTAL COST-EFFECTIVENESS**

Health and Safety Code Section 40920.6 requires an incremental cost-effectiveness analysis for Best Available Retrofit Control Technology (BARCT) rules or emission reduction strategies when there is more than one control option that would achieve the emission reduction objective of the proposed amendments, relative to ozone, CO, SO<sub>x</sub>, NO<sub>x</sub>, and their precursors. The proposed control option is biogas cleanup, with oxidation and SCR catalyst control, while the alternative control option is shutting down the engines, purchasing electricity from the grid, and flaring the biogas. To determine the incremental cost effectiveness, the calculated difference in the dollar cost between the two control options is divided by the difference in their emission reduction potentials.

The basis for the control options is the OCSD pilot study demonstration project engine (2500 kW). To calculate the cost to purchase the power from the grid, the present worth value (PWV) of the electricity produced by the engine is calculated using its size and its annual hours of operation (6,000 hours) at a nominal rate of \$0.08 per kW-hr. The present worth calculation assumes a 4% interest rate and a 20 year program life. The present value of the operations and maintenance (O&M) costs is also factored (subtracted from the electricity costs) since these are costs that will be avoided if the engine is no longer in service. The engine maintenance costs are twice the upper value for a natural gas ICE (\$0.014 per kW-hr). The total proposed project cost (PWV of OCSD engine with controls) is then subtracted from the PWV of the total project alternative project cost (purchasing electricity).

The emission reductions of the alternative project are calculated by using the net emissions of removing an engine from service and factoring the emissions from flaring and from a central power plant to replace the engine power produced. The emission reductions from removing the engine from service are calculated for NO<sub>x</sub>, VOC, and CO/7, using emission factors based on the current Rule 1110.2 compliance limits (at 6,000 annual operating hours and a 20 year program life). The flare emissions are calculated using the fuel consumption (permit limit) and existing (average limit) flare emission factors for NO<sub>x</sub>, VOC, and CO. The total emissions for flaring over 20 years are calculated for NO<sub>x</sub>, VOC, and CO/7. Next, the central power emissions are calculated using emission factors based on central power plant BACT emission standards. It was assumed that 50% of the power replaced would come from the central power plant. The emissions over 20 years were then calculated for NO<sub>x</sub>, VOC, and CO/7. The sum of

the flaring and central power plant emissions are then subtracted from the engine emission reductions to obtain the net emission reductions of the alternative control option.

Finally, the emission reductions of the proposed control option are factored into the final calculation (from present rule limit to proposed rule limit at 6,000 annual operating hours over 20 years). The difference of the PWV of the alternative control option and the proposed control option is divided by the difference in the emission reduction potentials for both projects. If “a” is the alternative control option and “p” is the proposed control option, then the incremental cost effectiveness is:

$$(C_a - C_p) / (E_a - E_p) = \$757,100/\text{per ton}$$

The calculated value clearly indicates that the alternative control option is not viable when compared to the proposed controls.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ANALYSIS**

Pursuant to the California Environmental Quality Act (CEQA) and AQMD Rule 110, SCAQMD staff has reviewed PAR 1110.2 to identify the appropriate CEQA document for evaluating potential adverse environmental impacts. Because the proposed project consists of changes to a previously approved project evaluated in a certified CEQA document and none of the conditions described in CEQA Guidelines §15162 calling for preparation of a subsequent CEQA document would occur, staff has concluded that an Addendum to the December 2007 Final Environmental Assessment: Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs), prepared pursuant to CEQA Guidelines §15164, is the appropriate CEQA document for the proposed project. Pursuant to CEQA Guidelines §15164(c) an addendum need not be circulated for public review. However, upon completion, the Addendum as well as the February 2008 Final Environmental Assessment will be available to the public at AQMD Headquarters or by calling the AQMD Public Information Center at (909) 396-3600.

## **SOCIOECONOMIC ASSESSMENT**

PAR 1110.2 would re-establish the concentration limits for biogas-fired engines for a later time, that is from 2012 to 20~~15~~/16. Furthermore, the universe of affected biogas-fired engines by PAR 1110.2 is currently at 55 engines, reduced from 65 engines evaluated as part of the 2008 amendments, which is a reduction of 14 percent of the total bhp.

The technologies for complying with the concentration limits have remained the same since 2008 and costs of these technologies have stayed relatively constant. According to the February 2008 Socioeconomic Report for Rule 1110.2, the 2011 present value (including capital, operating and maintenance costs) of SCR/Oxidation Catalyst/Biogas

Cleanup System for large biogas engines (>1,500 bhp) was \$3.37 million over a 20-year period. The actual present value of a similar system (with catalyst replacement every three years) at OCSD was \$3.09 million. Based on catalyst replacements every two years, AQMD estimates the present value of the same system to be \$3.47 million.

The additional time for compliance and fewer affected engines would result in overall savings to the affected universe as a whole, compared to what was analyzed as part of the 2008 amendments. Therefore, given the fact that there are fewer engines to control and the control costs remained relatively constant compared to what was evaluated as part of the Socioeconomic Assessment conducted for the 2008 amendments to Rule 1110.2, the findings and conclusions of that analysis remain valid for this proposed amendment as well.

That 2008 Final Socioeconomic Assessment will be available to the public at AQMD Headquarters or by calling the AQMD Public Information Center at (909) 396-3600.

### **DRAFT FINDINGS UNDER CALIFORNIA HEALTH & SAFETY CODE SECTION 40727**

California Health and Safety Code Section 40727 requires that prior to adopting, amending or repealing a rule or regulation, the 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 staff report. In order to determine compliance with Sections 40727 and 40727.2 a written analysis is required comparing the proposed rule with existing regulations.

The draft findings are as follows:

**Necessity:** PAR 1110.2 is necessary to reduce emission limits from combustion equipment in order to meet federal and state ambient air quality standards for ozone and PM 2.5.

**Authority:** The AQMD obtains its authority to adopt, amend, or repeal rules and regulations from California Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, 40725 through 40728, and 41508.

**Clarity:** PAR 1110.2 has been written or displayed so that its meaning can be easily understood by the persons affected by the rule.

**Consistency:** PAR 1110.2 is in harmony with, and not in conflict with or contradictory to, existing federal or state statutes, court decisions or federal regulations.

**Non-Duplication:** PAR 1110.2 does not impose the same requirement as any existing state or federal regulation, and is necessary and proper to execute the powers and duties granted to, and imposed upon the AQMD.

**Reference:** In amending this rule, the following statutes which the AQMD hereby implements, interprets or makes specific are referenced: Health and Safety Code sections 39002, 40001, 40702, 40440(a), and 40725 through 40728.5.

## **COMPARATIVE ANALYSIS**

Under Health and Safety Code Section 40727.2, the 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 AQMD rules and air pollution control requirements and guidelines that are applicable to industrial, institutional, and commercial combustion equipment. A comparative analysis is not required if the District finds that the proposed rule does not impose a new emission limit or standard. The District makes that finding, since the 2012 limits are already existing and the proposed rule does not make it more stringent. Nevertheless, the District incorporates by reference the comparative analysis contained in the February 2008 Final Staff Report for PAR 1110.2, which is also updated below for changes.

### **National Emissions Standards for Hazardous Air Pollutants and New Source Performance Standards**

Appendix F in the 2008 Final Staff Report for Proposed Amended Rule 1110.2 (February 2008) provides a detailed summary and comparison of the key elements of PAR 1110.2, the RICE NESHAP, and the NSPS. Appendix F is incorporated in this report by reference and is available at <http://www.aqmd.gov/hb/2008/February/080233a.html>. The proposed amendments of PAR 1110.2 are not in conflict with federal regulations.

### **AQMD Rules Applying to Stationary Gaseous- and Liquid-Fueled Engines**

AQMD Rule 218 and 218.1 - Continuous Emission Monitoring Rules, which were amended on May 14, 1999, and May 4, 2012, respectively, set forth requirements for new, modified and existing continuous emission monitoring systems that include certification, development and implementation of a Quality Assurance/Quality Control Plan, recordkeeping, reporting, and performance specifications. PAR 1110.2 requires ICEs with required CEMS to comply with Rule 218 and 218.1.

AQMD Rule 401 – Visible Emissions, which was last amended on November 9, 2001, prohibits the discharge of emissions into the atmosphere from any single source for period or periods aggregating more than three minutes in any one hour which will cause: a dark or darker shade as that of a number 1 on the Ringelmann chart, as published by the United States Bureau of Mines, or of an opacity equal or greater than number 1 on the Ringelmann chart.

AQMD Rule 431.1 – Sulfur Content of Gaseous Fuels, which was last amended on June 12, 1998, prohibits the sale and use natural gas with a sulfur content exceeding 16 ppm. Rule 431.1 also prohibits the sale and use of the following gases with a sulfur content

exceeding: 150 ppmv in landfill gas; 40 ppmv in refinery gas, sewage digester gas and other gases.

AQMD Rule 431.2 – Sulfur Content of Liquid Fuels, which was last amended on September 15, 2000, prohibits the purchase by stationary source end users of any diesel fuel with a sulfur content exceeding 15 ppm on and after June 1, 2004.

AQMD Rule 1303 - New Source Review Requirements, which was last amended on December 6, 2002, requires BACT, modeling and emission offsets for any new or modified source which results in an emission increase of any nonattainment air contaminant, ozone depleting compound or ammonia.

AQMD Rule 1401 - New Source Review of Toxic Air Contaminants, which was last amended on September 10, 2010, specifies limits for maximum individual cancer risk (MICR), cancer burden, and non-cancer acute and chronic hazard index (HI) from new, modified and existing permitted sources which emit toxic air contaminants (TACs) listed in Table I of Rule 1401. Although numerous TACs may be emitted from engines, formaldehyde, acrolein, methanol, and acetaldehyde account for essentially all of the mass emissions. PAR 1110.2 target pollutants are NO<sub>x</sub>, VOC and CO.

AQMD Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines, which was amended on May 4, 2012, addresses primarily toxic diesel PM from new and existing, stationary, emergency and non-emergency, diesel engines, whereas Rule 1110.2 addresses only NO<sub>x</sub>, VOC and CO emissions.

AQMD Regulation XX - Regional Clean Air Incentive Market (RECLAIM) superseded many Regulation IV and Regulation XI rules for NO<sub>x</sub> and SO<sub>x</sub> for the largest facilities with an emission trading program that achieved equivalent emission reductions, but in a way to allow facilities flexibility in achieving emission reduction requirements for NO<sub>x</sub> and SO<sub>x</sub> by methods such as add-on controls, equipment modifications, reformulated products, operational changes, shutdowns, and the purchase of excess emission reductions. Facilities for which emission fee data for 1990 or subsequent year shows four or more tons per year of NO<sub>x</sub> or SO<sub>x</sub>, excluding certain exempt sources, are subject to this program. Regulation XX specifically identifies requirements for ICEs, in addition to other specific sources, which include monitoring, reporting and recordkeeping for NO<sub>x</sub> and SO<sub>x</sub> emissions. PAR 1110.2 would apply to VOC and CO emissions from IC Engines from these sources.

While only applicable to new electrical generating engines, the CARB 2007 Distributed Generation Regulation is discussed below.

### **CARB 2007 Distributed Generation Regulation**

Beginning in 2007 CARB required new Distributed Generation (DG) units sold in the state to be certified by meeting emission standards that are at least equivalent or more stringent than those for large central power generating stations with BACT. The emission standards are applicable unless engines are not exempt from any District requirements. In addition, the regulation calls for currently permitted equipment to meet the more stringent emission standard by the earliest practicable date. Biogas fueled ICES subject to the CARB regulation installed after January 1, 2013 must meet the emission standards of large central power generating stations with BACT.

**ATTACHMENT A**

**PAR 1110.2 PUBLIC COMMENTS AND RESPONSES**

## Technical Feasibility

**Comment:** There is no reliable hard data that documents the successful operation of a landfill gas to energy facility. SCR and gas cleanup for siloxane removal hasn't been proven.

**Response:** While the demonstration projects in our Basin focused on digester gas-powered biogas engine control systems, such systems are directly applicable to landfill gas-powered biogas engines. This holds true for the oxidation catalyst/SCR based system of the successfully completed pilot study by the Orange County Sanitation District as well as the other control technologies of the ongoing demonstration projects. The feasibility of biogas cleanup/oxidation catalyst/SCR-based controls on a landfill gas-powered biogas engine has been demonstrated by Ameresco at Ox Mountain Landfill in the Bay Area. Staff conducted a site visit to Ameresco's facility at Ox Mountain Landfill and verified that the equipment has operated successfully for almost three years with gas cleanup, oxidation catalyst, and SCR. With the exception of some operational challenges during commissioning and start-up, the equipment has been effective in meeting the proposed rule's emission limits. Ameresco's TSA system has never experienced a siloxane breakthrough and consistently removes siloxanes effectively. Gas cleanup for siloxanes has been in use at landfills is an established technology, as these systems are currently in use for the protection of landfill gas-fired turbines.

**Comment:** Flaring biogas is undesirable, but may be necessary if the costs of controls become too prohibitive.

**Response:** Staff agrees that the flaring of biogas is undesirable, especially since it is a renewable resource. However, if a facility decides to flare the biogas and purchase the lost power from a central power plant, the criteria pollutant impacts will be lower than operating the biogas engines and, although elevated, the greenhouse gas (GHG) will not be significant.

**Comment:** Staff should take into account and analyze the recent deactivation of OCSD's oxidation catalyst due to siloxanes in terms of added costs.

**Response:** Until staff receives and independently reviews the laboratory results, it is premature to say that siloxanes were the cause of the elevated emissions or conclude that the oxidation catalyst failed. Staff agrees that the elevated CO emissions above 100 ppmv are not what the facility is accustomed to and provided a reasonable cause for concern, but the emission levels were still well within compliance when the oxidation catalyst was removed from service. In spite of the uncertainty associated with the CO emission increase and to account for the potentially more frequent catalyst replacement needed, staff has adjusted the annual operating costs to reflect a 2 year life for the catalyst instead of a three year life. Even with the increased catalyst replacement frequency, the controls remain cost effective. Please note that Ox Mountain has also experienced a similar elevation of CO emissions during its three years of operating six engines, but the



facility has not had to replace a catalyst throughout its entire operation due to deactivation.

**Comment:** Staff should conduct a site-by-site analysis of landfill lives for cost effectiveness. Some landfills are already closed and the 20 year life would not be realistic for any new equipment.

**Response:** There is an element of uncertainty associated with the closure of a particular landfill site. For example, one landfill site was scheduled for closure within the next few years. It is now our understanding that this same site may remain operating for several more years due to a decrease in the amount of waste deposited at that site. Also under consideration should be the fairly low cost-effectiveness of the proposed amendment. On this basis, a proposed project would still be marginally cost-effective with an equipment life much less than the assumed 20-year life. For example, the shortest term power purchase agreement from one of the affected private operators is nine years. Even with a nine year equipment life, the highest peak value of cost effectiveness is \$13,100 per ton. This value is well within the cost effectiveness of previously adopted or amended NOx rules. For these projects there is a salvage value associated with the installed equipment, a value that was not accounted for in the proposed 20-year life project. Ultimately it is a business decision unique to the particular facility operator to shut down the site prior to rule implementation in 2016<sup>5</sup>, install the proposed control equipment, opt for one of the alternate control options (e.g., flex energy), or burn the fuel in other existing equipment (e.g., boilers and flares), if available.

**Comment:** Stakeholders have not received any substantial information and data regarding Ox Mountain's ability to continue to comply with the proposed emission limits.

**Response:** Staff conducted a site visit to the facility in April and received a wealth of information from the facility operators. This information is provided in the Technology Assessment. In addition, staff has requested more complete CEMS data and is currently awaiting its receipt. Upon receipt and analysis, Staff will make the information available to the stakeholders.

**Comment:** SCR technology is not scalable to smaller engines.

**Response:** Based on communication with technology vendors, SCR systems are scalable to the engines of all sizes, including the smallest in the biogas engine inventory. These vendors have been producing catalytic controls for over 2 decades on a wide variety of equipment and for engine sizes within the scope of this rule amendment. The control systems in SCR units are a standard size and are provided at a fixed cost. The catalyst volume is dependent on the horsepower of the engine and the outlet flow produced, but is a smaller part of the total price for smaller engines. The catalyst price and housing size actually begins to increase for higher horsepower engines and flows since more catalyst blocks are required. SCR systems have been installed on a wide range on engine sizes, including the size range of the biogas engines subject to this regulation.

**Comment:** Commercial, cost-effective technologies are not available.

**Response:** In staff's Technology Assessment, Oxidation Catalyst/SCR with gas cleanup has been identified as feasible, cost-effective technology. Once biogas is cleaned the catalysts perform at the same level as natural gas-fired engines.

**Comment:** Biogas is not natural gas and biogas engines should not be subject to the same emission restrictions as natural gas engines.

**Response:** The difference between biogas and natural gas is the methane content and, hence, the BTU level. Installations exist today that convert biogas into high BTU gas that can actually be injected into the natural gas pipeline. There are also gas cleanup systems in the District that currently clean landfill gas for powering gas turbines. Staff feels that when properly cleaned, biogas can run an engine with controls and should be subject to the same requirements as those for natural gas engines, especially when the emissions from current biogas engines are 55 times higher than those of central power plants.

#### Operational/Compliance

**Comment:** NO<sub>x</sub> excursions above the compliance limit will be expected at landfill sites. Maintaining the efficiency correction factor (ECF) would help to accommodate these excursions.

**Response:** Staff's proposal of using a longer averaging time will actually benefit a facility better than using the ECF. For example, an engine with an ECF of 1.25 will have a NO<sub>x</sub> limit of 13.75 ppmv. The longer averaging time proposed in the rule will aid in addressing spikes that are much higher than 13.75 ppmv, as long as the equipment is consistent in meeting lower mass emissions.

**Comment:** The operation of the NO<sub>x</sub>Tech does not necessarily require an Air-to-Fuel-Ratio Controller (AFRC) to function properly. A rule provision should be added to make an allowance for an AFRC to be optional when operating the NO<sub>x</sub>Tech.

**Response:** The rule allows for alternative controls with an equivalent environmental benefit to be maintained, approvable by the Executive Officer. On this basis, the use of the NO<sub>x</sub>Tech, provided that it meets the rule limits, is potentially approvable.

**Comment:** Rule 1110.2 should be amended to make the breakdown provision consistent with that in Rule 430 in that a breakdown that results in the violation of any rule or permit condition be reported to the District within one hour of such event.

**Response:** The reporting provisions in Rule 430 and in Rule 1110.2 are both clear in classifying breakdowns that result in the violation of a rule or permit condition and those that result in excess emissions that violate a rule or permit condition. An operator has to be mindful of other rule or permit conditions, including those under Rule 430.

**Comment:** A shutdown provision should be added to the rule in addition to the 30 minute start-up exemption.

**Response:** Staff agrees with the commenter and has added the shutdown provision in the staff proposal to allow for proper cool down of engines and control equipment.

**Comment:** To remain in compliance, oxygen set points can be adjusted before going out of compliance. But the penalty incurred for this preventative measure is to return to a more frequent portable analyzer testing schedule.

**Response:** Staff agrees with the commenter and has included in the staff proposal the allowance for oxygen set point adjustments without returning to a more frequent portable analyzer testing schedule if the engine is in compliance before and after the set point adjustment.

**Comment:** When adhering to a portable analyzer testing schedule, some tests will coincide with a source test. A source test followed by a portable analyzer check at the same time is unnecessarily repetitive.

**Response:** Staff agrees with the commenter and has made a clarification in the Staff Report to allow source test results to be used in lieu of concurrently scheduled portable analyzer checks.

**Comment:** A clarification is needed to allow for the temporary removal of a catalyst for up to four hours after engine start-up following an engine overhaul or major repair requiring removal of a cylinder head. Oil and particulate contaminants from engine work can ruin a catalyst if it is operating during start-up.

**Response:** Staff agrees with the commenter and has made a clarification in the Staff Report to allow the temporary removal of a catalyst under the exemption provisions of Rule 1110.2(h)(11).

**Comment:** For operators of lean burn engines with low CO emissions, the currently required quarterly portable analyzer checks are unnecessary. Biannual source tests would be sufficient for compliance.

**Response:** The application of portable analyzer checks on a quarterly basis was the result of an extensive rule making process. The commenter will need to provide data to show that biannual source tests would be sufficient.

**Comment:** RECLAIM quarterly certification of emissions (QCER) reports are due within 30 days of the end of a quarter, but the Rule 1110.2 Inspection and Monitoring (I&M) reports are due within 15 days of the end of a quarter. RECLAIM facilities would like the submittal of the two reports to coincide at 30 days.

**Response:** It is not surprising that different rules will have different reporting requirements. These differences extend to both the content and submittal schedule of the reports. Unless the commenter can demonstrate the Rule 1110.2 reporting schedule should be lengthened, the current schedule will remain intact.

**Comment:** The proposed ~~24~~ hour averaging time should be applied to CO as well as NO<sub>x</sub>.

**Response:** Staff agrees and has modified the staff proposal to extend the longer averaging time option to CO.

**Comment:** The proposed lowering of the CO and VOC emission levels for new distributed generation (DG) engines to the CARB DG standard is unattainable. Current, on-going projects that are barely capable of meeting the current rule standards will not be able to meet the proposed levels. Some new projects will have to cease, allowing old, grandfathered engines to continue to operate. With the San Onofre plant possibly shutting down, there could be significant implications with distributed generation in California.

**Response:** Based on the response from industry and the current status of the technology, staff will retain the current standard, but will consider lowering the standard to the CARB level in the future.

### Compliance Schedule

**Comment:** The two year implementation deadline is not realistic for the design and construction of catalytic controls, especially for public agencies.

**Response:** Staff has revised its proposal to extend the compliance schedule to ~~3 and 4~~ three and a half years beyond the July 1, 2012 date, with up to 2 additional years for operators under long term fixed price power purchase agreements entered into before the February 1, 2008 amendments and extending beyond the January 1, 2016 compliance date with the payment of the compliance flexibility fee.

**Comment:** Other potential technologies seem infeasible with the current two to three year implementation schedule since they have not been proven to be effective.

**Response:** The Technology Assessment is providing ample evidence about the feasibility of controlling emissions from biogas engines through an oxidation catalyst/SCR control system in conjunction with a biogas cleanup system. The proposed ~~three to four~~ three and a half year implementation schedule will allow for additional

technology demonstration projects to complete and provide stakeholders with more choice and enough time to allocate funds, permit, construct, and install the equipment.

**Comment:** The compliance schedule should be conditional upon meeting certain technology demonstration goals by keeping the Technology Assessment open, thus allowing the technology to prove itself before committing to a schedule.

**Response:** Staff will commit to continue the technology review/implementation process and report back to the Stationary Source Committee beginning no later than July 1, 2013 to assure that the schedule for compliance is reasonable and to make appropriate recommendation on potential rule changes if necessary.

### Cost Effectiveness

**Comment:** The cost analysis should be conducted using dollars per kW hour. This is more relevant to an operator's decision making to justify the project. The Interim Technology Assessment committed to analyzing costs using this metric.

**Response:** While it is difficult to perform this type of analysis since every single facility and operator affected by the proposed amendments is unique, Staff did calculate costs in dollars per kW hour in its analysis across the range of engine sizes with considerable contingencies. The fact remains that the environmental benefits are not reflected at all in a cost per kW hour calculation. As operators make decisions based on dollars per kW hour, our Governing Board has to make decisions based on the cost per ton of pollutants removed.

**Comment:** Existing gas cleanup equipment was used in OCSD and the costs for a brand new system should be included in AQMD's cost analysis.

**Response:** OCSD used its existing compressors and chillers for its gas cleanup. Other operators also have similar existing equipment. However, Staff has applied a 20% contingency to the equipment capital costs to account for the necessity of some facilities to install brand new equipment, such as compressors and chillers. These costs are reflected in Staff's cost effectiveness analysis.

**Comment:** The costs are based on OCSD low siloxane levels. There is no analysis for facilities with much higher siloxane loads, such as in landfill applications.

**Response:** OCSD changed its media three times during its year-long demonstration project. The cost analysis has also accounted for much more frequent carbon media change-outs (monthly), to account for scenarios with higher siloxane loads. This will obviously drive up the operational costs and is reflected in Staff's analysis as a cost contingency.

**Comment:** The emission reductions that Staff calculated for Ox Mountain are not considering the actual emission levels and overstate the emission reductions.

**Response:** For rulemaking, it is the standard practice to calculate emission reductions from rule or permit limits to the proposed limits. Actual emission levels and source tests are “snapshots” of a moment in time and, although compliant, may not accurately reflect the emissions for any other given time period. Please do note that if one considers the better than expected performance of the control technologies, arguably there are additional reductions that can be claimed above and beyond the proposed rule limits. Therefore, staff believes that calculating emission reductions from current limits to future rule limits, for the purposes of estimating cost effectiveness, is a reasonable approach.

**Comment:** Plants with less engines and less capacity will pay a much higher capital cost for gas cleanup.

**Response:** The size of the gas cleanup system is dependent on the overall fuel flow rate of the gas that will be used by the engines. Smaller fuel flows will require smaller media vessels. The operating costs will depend on the siloxane load and how often media change-outs are required.

**Comment:** Staff has not incorporated the costs submitted by the affected facilities into its cost effectiveness analysis.

**Response:** District staff solicited cost information from all the affected biogas facility operators and received detailed costs for half of these facilities. Based on the costs provided by the twelve facilities and applying emission reductions from existing to proposed rule limits, the current cost effectiveness range as submitted by the twelve facilities using the DCF model is \$2,700 to \$50,100 per ton of NO<sub>x</sub>, VOC, and CO/7. This is a wide range and is difficult to normalize based on the wide variety of cost assumptions submitted. OCSD’s calculated cost effectiveness, including additional contingencies, amounted to \$2,600 per ton. It should be noted that the OCSD’s cost effectiveness is based on actual data, not estimated data by the twelve facilities. A cost effectiveness of \$30,000 per ton roughly signifies the upper limit for rules presented to the AQMD Governing Board, based on past rulemakings. All of the cost submittals contained contingencies of varying degrees, and others added inflation rates to the cost estimates. These cost components have never been used in any of the past AQMD cost effectiveness analyses. The cost effectiveness of two facilities (\$48,200 and \$50,100 per ton) illustrates the effect of excessive contingencies added to the capital and operating costs. One facility had capital contingencies up to 50%, in addition to its project design and management contingencies. Some of the equipment costs are significantly higher than those provided by vendors, even with contingencies added. OCSD’s operating costs in its final report were \$58,950, while some of the others facilities’ were orders of magnitude higher (as high as over 10 times). These excessively high contingencies and operating costs are inappropriate for a cost effectiveness analysis that has a reference point based on actual cost data. Even though the twelve facilities provided their own cost data, inflation rates, and contingency factors, only the two aforementioned facilities’ cost effectiveness went above the Board-accepted cost effectiveness for recently amended

AQMD rules. Taking this into account as well as the cost effectiveness analysis based on actual cost data clearly indicates that the staff proposed rule amendment is cost effective.

**Comment:** No costs for additional maintenance for the gas cleanup system and catalyst controls as well as costs for lost electricity during maintenance were provided for Ox Mountain, which can drive up costs.

**Response:** Gas cleanup generally results in extending the engine's operating cycle and reducing the maintenance cycles and frequency during which engines must be taken out of operation and undergo expensive repairs. Longer operating cycles and reduced maintenance translate into more power produced and reduced operating costs. These cost savings were not identified by the commenter. Staff has added contingencies in its cost analysis to cover some of the potential costs identified by the commenter. With the contingencies added, the cost effectiveness is well within (by a factor of 6) the rough upper bound of \$30,000 per ton, based on previous AQMD rulemakings. Consequently, even if costs for maintenance and reduced power production nominally increase for a particular installation adjusted with the previously mentioned cost savings, the resulting cost effectiveness would be well within the upper bound value and thus, still cost effective.

#### Space Limitations

**Comment:** The space limitations at some facilities would make it impossible to add oxidation catalyst and SCR controls to the engines.

**Response:** Catalyst manufacturers and installers have found innovative ways to design and construct structures and piping to accommodate varying configurations. For example, OCSD's project involved the construction of an elevated platform outside of the engine building to allow for vehicle traffic underneath. Other installations use elevated supports, roof-mounted supports, and even wall-mounted supports where plot space is very limited.

#### Financing Control Equipment

**Comment:** Existing power purchase agreements (PPAs) make it impossible to make any capital expenditures on control equipment. Any modifications would be economically infeasible and would likely lead to flaring.

**Response:** Staff has requested the PPAs from those affected for review by District Counsel, per the recommendation from members of the Stationary Source Committee at its April 2012 meeting. To date, staff has not received any PPAs from the affected facilities. It should be noted that the ongoing rule development process regarding the biogas engines was initiated well before the 2008 amendments, which provided the operators with more than adequate time to revise their PPAs prior to the future effective dates. Despite this, staff is proposing an alternate compliance option for these affected

facilities, which will provide up to two additional years for compliance beyond the January 1, 2016 compliance date, with the payment of a compliance flexibility fee. Only operators that entered into power purchase agreements prior to the February 1, 2008 amendments and that extend beyond the January 1, 2016 compliance date are eligible to benefit from the alternate compliance option.

**Comment:** The stakeholders need help in achieving a legislative fix to provide additional financial incentives for biogas energy projects.

**Response:** The AQMD will be a willing participant in the support of legislation that will provide additional financial incentives for biogas energy projects and has already taken support position on several pending legislations.

**Comment:** Current State legislation prohibits any landfill gas to pipeline projects. The stakeholders also need District support in helping stakeholders reach this goal.

**Response:** The AQMD will also be a willing participant in support of allowing stakeholders to inject clean landfill gas into the gas pipeline, provided it is cleaned up to reasonable specifications established by CPUC or State law.

#### GHG Impacts

**Comment:** Staff needs to consider criteria pollutant emissions that are offset from operating biogas engines and not flaring and purchasing electricity from the central power plants.

**Response:** Staff has considered the tradeoffs between generating electricity with biogas engines meeting current emission limits and central power plants. While increased flaring of biogas results in increased electricity generation from central plants to meet demand, the resulting criteria pollutant emissions impact from both central power plants and biogas flaring would be less than current engine emissions and, for GHG emissions, would be slightly higher. Staff has analyzed the impact of potential increased flaring in the staff report and in the Technology Assessment.

**Comment:** Staff needs to acknowledge the benefit of gas to energy projects as better overall for GHG emissions than flaring.

**Response:** AQMD staff acknowledges the benefits of biogas to energy projects. Since the South Coast is a non-attainment area for ozone, achieving criteria pollutant reductions is a priority for AQMD and CARB. In our GHG analysis, it is clear that the criteria emissions from flaring are lower than from biogas ICEs. Staff, however, is mindful that flaring is undesirable and understands the importance of maintaining the productivity of biogas to energy projects. Since biogas engines pollute significantly more than their natural gas counterparts and central power plants, it is staff's desire to decrease biogas ICE emissions by requiring controls which are both feasible and cost effective. Given the region's extreme non-attainment status with respect to the 8-hour ozone standard and



non-attainment status with respect to the PM<sub>2.5</sub> standards, the superior criteria pollutant reduction benefits (especially in NO<sub>x</sub>) of the staff proposal (even with increased flaring) will more than compensate for the slight disbenefit in GHG emissions.

## ATTACHMENT G

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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## Assessment of Available Technology for Control of NO<sub>x</sub>, CO, and VOC Emissions from Biogas-Fueled Engines

### **Draft Final Report**

**August 2012**

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## INTRODUCTION

Rule 1110.2 establishes emission limits of NO<sub>x</sub>, VOC, and CO for stationary, non-emergency gaseous- and liquid-fueled engines, including the 55 engines in this source category, that are fueled by landfill or digester gas (biogas). The emissions from biogas engines amount to approximately 1.3 tons per day of NO<sub>x</sub>, 0.8 tons per day of VOC, and 25.6 tons per day of CO.

Rule 1110.2 was amended on February 1, 2008 to lower the emission limits of natural gas and biogas engines to BACT levels for NO<sub>x</sub> and VOC and to levels close to BACT for CO. The limits for natural gas engines at or above 500 bhp took effect on July 1, 2010, while those for natural gas engines below 500 bhp took effect on July 1, 2011. Biogas engines were given until July 1, 2012 to comply with the new limits.

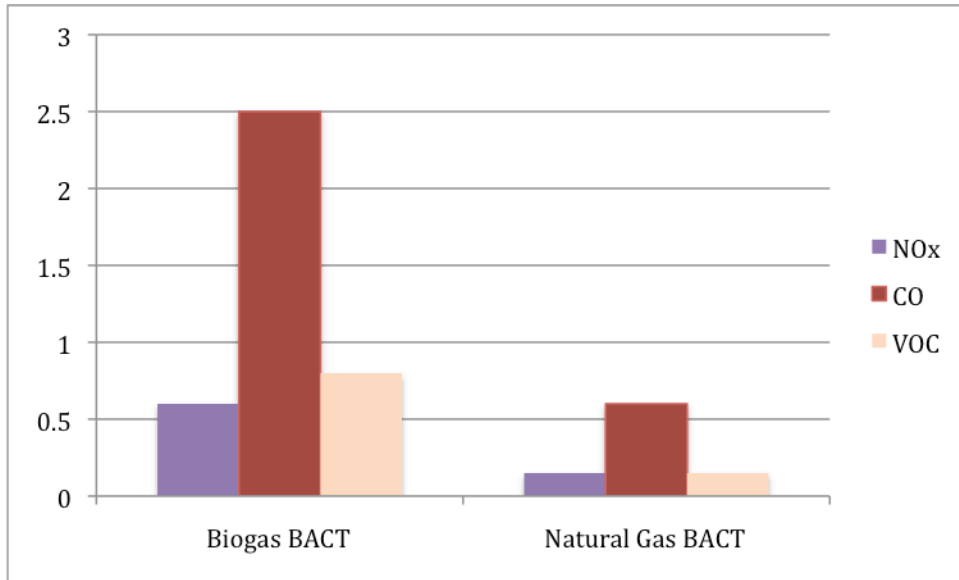
**Table 1. Current and Future Biogas Engine Emission Limits (ppmvd @15% O<sub>2</sub>)**

	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>
≥ 500bhp	36 x ECF*	250 x ECF* (digester) 40 (landfill)	2000
< 500 bhp	45 x ECF*	250 x ECF* (digester) 40 (landfill)	2000
<b><i>Future limits<sup>1</sup></i></b>	<b><i>11</i></b>	<b><i>30</i></b>	<b><i>250</i></b>

\*ECF is the Efficiency Correction Factor

<sup>1</sup> The “future” limits are those that were originally scheduled to go into effect July 1, 2012, but did not go into effect, as explained below.

The future emission levels in Table 1 are based on BACT limits for lean-burn natural gas engines, which in g/bhp-hr are 0.15 for NO<sub>x</sub>, 0.6 for CO, and 0.15 for VOC. The current BACT limits for biogas engines are much higher. Expressed in g/bhp-hr, they are 0.6 for NO<sub>x</sub>, 2.5 for CO, and 0.8 for VOC. Figure 1 highlights this difference.



**Figure 1. Biogas vs. Natural Gas BACT in g/bhp-hr**

The BACT limits for lean-burn natural gas engines have been in effect for many years and many installations are complying with these limits by way of oxidation catalysts for CO and VOC control and selective catalytic reduction (SCR) for NOx control.

The amendment and adopting resolutions of Rule 1110.2 in 2008 directed staff to conduct a Technology Assessment to address the availability, feasibility, cost-effectiveness, compliance schedule, and global warming gas impacts of biogas engine control technologies and report back to the Governing Board no later than July 2010. Immediately after the 2008 amendment, staff began work on the Technology Assessment and followed the progress of several technology demonstration projects.

1. *OCSD (Orange County Sanitation District)*. A year-long pilot study utilizing a digester gas cleanup system (non-regenerative) and catalytic oxidation with selective catalytic reduction.
2. *EMWD (Eastern Municipal Water District)*. Two selective non-catalytic reduction technologies applied to water and wastewater treatment applications. One technology (NOxTech) was installed at a pumping station with three natural gas-fired engines. The other technology utilizes fuel cells to produce power from digester gas at two of its wastewater treatment facilities.

3. *IEUA (Inland Empire Utilities Agency)*. Fuel cells have been installed at this digester gas facility to eventually replace the IC engines currently installed.
4. *Ox Mountain*. This installation in the Bay Area uses biogas cleanup, catalytic oxidation, and SCR to produce power from landfill gas. The technology is similar to OCSD's in its post combustion after treatment, but uses a regenerative siloxane removal system to clean the landfill gas.

In July 2010, staff presented to the Governing Board an Interim Technology Assessment which summarized the biogas cleanup and biogas engine control technologies to date and the status of on-going demonstration projects. Due to the delays caused by the permit moratorium in 2009, the release of another report was recommended upon the completion of these projects. The Interim Technology Assessment concluded that feasible, cost-effective technology that could support the feasibility of the July 2012 emission limits is available, but that the delay in the demonstration projects would likely necessitate an adjustment to the July 1, 2012 compliance date of Rule 1110.2.

The proposed amendments for Rule 1110.2 provide an adjustment to the July 1, 2012 compliance date. Since July 2010, District staff has received ample evidence in support of the feasibility of biogas engine control technology and the feasibility of the compliance limits to complete the Technology Assessment. This Final Technology Assessment discusses the technologies pertinent to biogas engines for complying with these emission limits.

## **BIOGAS CLEANUP**

For natural gas engines, the use of catalyst after-treatment is an effective method for pollutant control. However, Rule 1110.2 did not lower the emission limits for biogas engines at the same time as natural gas engines because the same catalyst controls for natural gas engines would experience fouling when exposed to the combustion products of biogas. It was learned that the cause of the catalyst fouling was due to a specific impurity in the gas stream. These impurities are now known as siloxanes.

In the 2010 Interim Technology Assessment, the impacts of siloxanes were highlighted and evaluated in terms of facility-specific levels and control costs. The conclusion was that by installing an appropriately designed biogas cleanup system, an engine along with its post-combustion control system can function properly.

A prime concern for many biogas engine operators is the quality of the fuel going into the engines. Biogas, whether coming from a wastewater treatment plant digester or from a

landfill, has many impurities, including but not limited to sulfur-containing compounds and siloxanes, that require some sort of treatment. If left untreated, raw biogas can damage engine components that will result in more maintenance and ultimately, reduced longevity of an engine. Siloxanes crystallize at elevated temperatures and can become deposited even in fuel lines. Upon combustion, siloxanes oxidize and more commonly become deposited on engine parts (pistons, piston sleeves, and valves) as silicon dioxide ( $\text{SiO}_2$ ). As a result, more frequent major maintenance on engines is required so that these deposits can be cleaned up from within the engine. These major repairs involve the removal of the engine head to access the internal valves and piston shafts. Failure to perform this kind of maintenance can result in catastrophic damage to an engine. The pretreatment of biogas is even more critical with the employment of catalyst-based after-treatment technologies downstream from the engines. If left untreated, these siloxane impurities can negatively affect the catalysts. The catalyst active sites can become masked by the deposition of the silica, therefore reducing the efficiency of the entire catalyst for pollutant removal.

Since the release of the Interim Technology Assessment and the installation of several biogas cleanup systems in the basin, it has been established that biogas cleanup cannot consist of siloxane removal only. Depending on the source of the raw biogas, some facilities have biogas profiles that contain varying levels of other pollutants, such as VOCs and sulfur compounds. Also, with the installation of fuel cells and gas turbines operating on biogas in the basin, the fuel specifications for these sophisticated units are extremely stringent for impurities. Biogas entering these systems must be completely cleaned of many impurities to guarantee proper performance.

Some facilities currently have practically no gas cleanup while most others employ some sort of gas cleanup for improved engine maintenance. On the other hand, a few facilities already employ a complete biogas cleanup system for protection of post combustion catalysts or turbines. Many facilities often utilize a typical cleanup system that results in moisture and particulate removal only. The previously mentioned demonstration project at the Orange County Sanitation District (OCSD) utilized the facility's existing compressors and chillers, while relying on a single activated carbon vessel as the sole source for siloxane removal. This digester gas cleaning system (DGCS) was installed (supplied by Applied Filter Technology) to remove contaminants from the digester gas before combustion and the potential for carbon media breakthrough was routinely monitored throughout the pilot study. Depending on the existing level of contaminants, some facilities may have to install complete, skid-mounted gas cleanup systems that can include water and particulate removal filters, sorbent vessels for  $\text{H}_2\text{S}$  and siloxane

removal, compressors, chillers, coalescing filters, and vessels for VOC and sulfur species removal if necessary.

As described in the Interim Technology Assessment, there are two types of siloxane removal systems: regenerative and non-regenerative. Regenerative siloxane removal systems do not require constant removal of the sorbent material from the vessels. The vessels are set up in pairs and while the media in the first vessel is regenerated using a heated purge gas the second vessel handles the siloxane cleanup load. The regeneration cycle then switches to the second vessel when it nears its removal efficiency limit, while the first vessel now handles the gas cleanup.

The regenerative siloxane removal system at Ox Mountain Landfill is the only installation that currently uses this type of system for the protection of a post-combustion catalyst on a landfill gas-fired engine. Ox Mountain Landfill is located at Half Moon Bay, CA which is within the Bay Area Air Quality Management District's (BAAQMD) jurisdiction. The landfill gas to energy site (operated by Ameresco) has six GE-Jenbacher engines, each rated at 2677 bhp, that are fired on landfill gas. All six engines have been retrofitted with oxidation catalysts, while one of the engines also has an SCR system. The gas cleanup system with regenerative siloxane removal processes the gas for all the engines. It employs a Temperature Swing Adsorption (TSA) regenerative siloxane removal system manufactured by GE-Jenbacher. Eight pairs of adsorption beds (16 total vessels) using regenerative activated carbon are employed at this installation.  $AlO_2$  is an alternate media that is used at other locations. Electric coils in the vessel annular space heat the carbon media while clean biogas is flushed through the beds as a purge gas. The purge gas is then combusted by a small, enclosed flare. At Ox Mountain, eight vessels are actively removing impurities while the other eight are being regenerated. The parasitic load of the TSA system is obviously higher when actively heating the vessels, but it is about 5% of the total plant's output. The gas cleanup and oxidation catalyst/SCR was commissioned in 2009 and has shown to be very effective in the removal of siloxanes from the landfill gas. Performance data from 2009 to 2011 shows that the system is removing between 95 and 99 percent of inlet siloxanes (inlet between 7 and 10 ppmv with reported spikes between 25 and 50 ppmv), while no siloxane breakthrough has ever occurred at this facility. The gas is tested periodically, while carbon media and engine samples are also analyzed. Ox Mountain's TSA media requires a complete replacement around every twelve months, but some installations can go longer before media replacement. Every installation will have its own unique gas profile, so the regeneration cycles will be specific for every location and will take start-up time and



testing to optimize. The engines at Ox Mountain have also enjoyed the benefit of less frequent maintenance, and can run for much longer between major overhauls.

Non-regenerative siloxane removal systems require periodic replacement of the sorbent material (activated carbon or silica gel) once it is spent. Additionally, the use of two beds is more beneficial in that one bed can still be used while the other is recharged with fresh sorbent and vice versa. These systems are sized to handle the site-specific flow rate into all the facility's biogas engines and the siloxane load. Larger vessels are required for higher flow rate applications and a higher frequency of sorbent replacement is required for biogas streams with higher levels of siloxanes. A redundant dual-bed system enables the handling of intermittent spikes.

The following two tables (Table 2 and Table 3) are updates from the Interim Technology Assessment regarding catalyst performance with the protection of biogas cleanup with non-regenerative siloxane removal systems located both inside and outside of SCAQMD jurisdiction. All of the systems have been successfully operating with varying levels of biogas and the oxidation/SCR catalysts have been protected.

The demonstration project at OCSD has proven that a non-regenerative siloxane treatment system can condition biogas and protect biogas engines and post combustion catalysts. The gas cleanup system removed siloxanes, VOCs, and sulfur compounds effectively without any breakthrough to the engines. An added benefit was realized in that there was a reduction in the engine maintenance due to the cleaner biogas that was being combusted. Furthermore, the result was a cost savings for engine maintenance, increased engine uptime, and longer maintenance intervals. The OCSD demonstration project saved \$43,547 in engine maintenance costs annually with the use and careful monitoring of the gas cleanup system. Additionally, the gas cleanup system from its catalytic oxidizer pilot study in 2007 is still in operation today based on the performance improvements to the engine and the reduced maintenance costs.

With the demonstration project at OCSD completed and the installation at Ox Mountain in its third year, the employment of both regenerative and non-regenerative siloxane removal systems for the protection of post-combustion catalyst has been proven to be feasible. Performance data from both installations demonstrates effective siloxane removal for both digester and landfill gas applications.

**Table 2. Non-Regenerative Siloxane Removal Systems Located in SCAQMD**

<b>System</b>	<b>Type of Biogas</b>	<b>Size (SCFM Biogas)</b>	<b>Combustion Device</b>	<b>Natural Gas Blend in Combustion Device</b>	<b>Catalyst(s)</b>	<b>Startup Year</b>	<b>Operating History</b>	<b>Status</b>	<b>Comments</b>
Orange County Sanitation District	Digester Gas	850	IC Engine	10% Max	Oxidation	2006	Engine operation has been normal	Operating	Similar system tested in pilot study in 2010
Brea Parent 2007, LLC	Landfill Gas	3,000	IC Engine (3)	None	Oxidation	2006	Engine operation has been normal	Operating	Similar system will be used on new turbine plant with Oxidation/SCR catalysts
City of Industry	Landfill Gas	267	IC Engine	73%+	SCR and Oxidation	2005	Seasonal Operation	Use of biogas ended 2007	Methane content too low
UCLA	Landfill Gas	3,472	Gas Turbine	78%+	SCR and Oxidation	1994	Turbine operation has been normal	Operating	
LADWP Scattergood Generating Station	Digester Gas	5,555	Boiler (2)	89%+	SCR and Oxidation	2001	Boilers have been in normal operation	Operating	

**Table 3. Non-Regenerative Siloxane Removal Systems Located Outside of SCAQMD**

System	Type of Biogas	Size (SCFM Biogas)	Combustion Device	Natural Gas Blend in Combustion Device	Catalyst(s)	Startup Year	Operating History	Status	Comments
Carson Cogen (Elk Grove, CA)	Digester Gas	2,500	Gas Turbine	75%	SCR	1996	Turbine operation has been normal	Operating	Digester gas now is further cleaned and transferred via natural gas pipeline to another power plant
Bergen County Utilities Authority (NJ)	Digester Gas	<del>300800</del>	IC Engine	<del>10-20%</del> None	Oxidation	<del>2008</del> 2	IC Engine operation was normal	<del>Operating</del> Awaiting Status	<u>CO limit is 27.1 ppmv, so more frequent catalyst replacements are required</u>
City of Eugene Wastewater Treatment Plant	Digester Gas	240	IC Engine	None	Oxidation	2004	IC Engine operation has been normal	Awaiting Status	

## CATALYTIC OXIDATION/SELECTIVE CATALYTIC REDUCTION

A proven and effective means for CO, VOC, and NO<sub>x</sub> control among natural gas fueled lean-burn engines is catalytic oxidation with selective catalytic reduction (SCR). If the raw biogas is cleaned sufficiently and effectively, there is no danger of fouling any post combustion catalyst by siloxane deposition.

Catalytic oxidation removes CO and VOC upon its contact with the catalyst. Oxidation catalysts contain precious metals that react incoming CO and VOC with oxygen to produce CO<sub>2</sub> and water vapor. Reductions greater than 90% in CO and VOC emissions are typical with this technology.

SCR can be used with lean-burn engines since the higher oxygen concentrations in the exhaust preclude the use of less costly nonselective catalytic reduction (NSCR or three-way catalysts). SCR requires the injection of urea to react with the NO<sub>x</sub> in the engine's flue gas, and is very effective in its removal. The SCR catalyst promotes the reaction of ammonia with NO<sub>x</sub> and oxygen, with water vapor and nitrogen gas being the end products.

The demonstration project at OCSD has shown with certainty that this combination of post combustion systems (oxidation catalyst and SCR) is capable of handling treated biogas combustion exhaust for multi-pollutant control. The District issued a grant to OCSD in 2009 (*SCAQMD Contract #10114*) to support the pilot test study of Engine No. 1 (in Fountain Valley) with a catalytic oxidizer/SCR with digester gas cleanup, and the operation of the pilot study was granted a Permit to Construct/Operate for an Experimental Research Project by SCAQMD (Application Number 497717) in November 2009. The construction and installation of the pilot study equipment commenced in October 2009; the pilot study testing officially began on April 1, 2010 and officially ended on March 31, 2011. A continuous emission monitoring system (CEMS) was used for analysis of NO<sub>x</sub> and CO emissions. The sampling methods for several other pollutants are listed in Table 4.

**Table 4. Sampling Methods for Pollutants in OCSD Pilot Study**

<b>Pollutant</b>	<b>Sampling Method</b>
CO	CEMS, Portable Analyzer, SCAQMD Method 100.1
VOC	SCAQMD Methods 25.1/25.3
NOx	CEMS, Portable Analyzer, SCAQMD Method 100.1
Aldehydes	Modified CARB Method 430, SCAQMD Method 323 (Formaldehyde)
Free Ammonia (Ammonia slip)	Modified SCAQMD Method 207.1 and Draeger <sup>®</sup> tubes

The results of the pilot study are as follows:

1. NOx emissions averaged around 7 ppmv, well below the proposed rule limit of 11 ppmv by over 35 percent.
2. VOC emissions averaged around 3.6 ppmv, well below the proposed rule limit of 30 ppmv by 88 percent.
3. CO emissions averaged around 7.5 ppmv, well below the proposed rule limit of 250 ppmv by 97 percent.

The maximum VOC level reached was around 5 ppmv, while the maximum CO level reached was 42 ppmv. The results were based on a 15-minute averaging time, per the current rule requirements. There were some NOx excursions during the testing period, however, and these accounted for around 4% of the total 15-minute measurement periods, using both valid and invalid data. Exceedances that were attributed to engine start-up (first 30 minutes), operational issues (breakdowns), and system adjustments were excluded and labeled invalid. Only validated data was used to account for the excursions, and these accounted for 0.9% of the total time periods.

Data from the OCSD demonstration project indicates that the emission control system reduces emissions of air toxics. The gas cleanup system removes acid gases, sulfur compounds, volatile air toxics, including aromatic and chlorinated organic compounds, and particulates that contain toxic compounds. OCSD took samples of digester gas before and after the gas cleanup system. The test program analyzed 66 organic compounds including 16 air toxics. OCSD test results indicate that concentrations of air

toxic compounds are reduced, non-detectable, or not changed. Emissions of aromatic hydrocarbons, precursors to formation of dioxins and furans, are significantly reduced. Emission of formaldehyde from the engine, the most significant source of risk from the facility, was reduced by 98% to below 1 ppm. This reduction is achieved by the oxidation catalyst. This combination of a gas cleanup system, oxidation catalyst and SCR will not increase emissions of air toxics and reduces the major source of risk from continued operation of these engines. The CEQA document for proposed amended rule 1110.2 provides additional information of air toxic impacts for the proposed rule.

OCSD’s final report recommended a less restrictive averaging time for biogas engines as a result of the pilot study data. Staff analyzed several possible averaging times to determine an acceptable time period that would address the exceedances without affecting the mass emissions. Using OCSD’s 15-minute raw data from its pilot study, several averaging times were evaluated; the results listed in Table 5. Consistent with OCSD’s analysis, only validated 15-minute block average data was used (not including exceedances due to start-up, atypical operating conditions, breakdowns, and system adjustments).

**Table 5. OCSD Pilot Study NOx CEMS Data**

Averaging Time (hours)	Number of 15-minute periods >11 ppmv
0.25	182
1	18
2	4
3	4
4	4
6	2
8	0
10	0
12	0
16	0
24	0

Staff found that an 8 hour block-averaging time would address OCSD's exceedances above 11 ppmv. As a result of this analysis, staff is proposing for engines with controls achieving superior performance in terms of reducing emissions, a ~~24~~24 hour averaging time to be able to comfortably address NOx exceedances without affecting the overall mass emissions. This longer averaging time will be extended to CO as well in the Staff proposal. With the results obtained, the OCSD project has demonstrated that this type of control technology can prove effective for meeting the proposed Rule 1110.2 limits.

A consideration that is always taken when applying SCR technology is the potential for ammonia slip when injecting urea into any exhaust gas stream. Ammonia is a toxic compound, and careful control must be taken in order to prevent excess amounts from escaping out of the stack. A limit of 10 ppm was assigned on the project's research permit and the maximum level emitted was 5 ppm during the pilot demonstration. An important factor when adjusting urea injection rates is ensuring that sufficient amounts of urea are injected in response to the engine's load demand and/or NOx level in real time or as close to real time as possible. This is to prevent too much ammonia from escaping out of the stack while simultaneously preventing too little urea from entering the exhaust stream that can result in an increase in NOx out of the stack.

An installation that also uses an oxidation catalyst/SCR technology, but applied to a landfill, is located at the Ox Mountain Landfill in northern California (Figure 2). Ameresco is the facility operator of the biogas engines at this location. One of its six GE-Jenbacher engines on-site was outfitted with both a catalytic oxidizer and SCR system in 2009 and has been operating since. Data that has been obtained from the BAAQMD has shown that the proposed Rule 1110.2 limits are achievable. CEMS data obtained from 2010 shows a consistent performance level that is consistent with OCSD's pilot study. In addition, monthly emission data shows that the proposed emissions limits are being achieved on an average mass per brake horsepower hour basis. The engines experienced some problems soon after startup, but the catalysts have performed effectively since 2009. The oxidation catalyst employs a guard bed upstream of the catalyst to aid in protection from harmful contaminants. The SCR catalyst has not been replaced since start-up, and has yielded efficient NOx removal for over 26,000 hours. The NOx excursions above 11 ppm throughout the operation of this installation have been attributed to operational problems with the engines, the SCR urea injection system, and monitoring problems. There are many moving parts in a urea injection system and in CEMS equipment, so problems were experienced with plugged nozzles, condensation in sampling lines, sample pump failures, and NOx cell failures that led to NOx events above 11 ppmv. From Ameresco's experience at Ox Mountain, the oxidation catalyst has

experienced decreased performance over time, but not above our proposed compliance limit of 250 ppmv. Engine wear has been suspected as the cause from the catalyst manufacturer, but there has been no evidence of any siloxane breakthrough or siloxane buildup at the oxidation catalysts for any of the six units.

Several biogas engine installations in the San Joaquin Valley are achieving compliant emissions today, running on dairy digester gas. Two installations (one at a winery and another at a dairy) are meeting the 11 ppmv NO<sub>x</sub> limit, but these engines are rich burn engines, and operate with NSCR post combustion controls. The source test results for NO<sub>x</sub> corrected to 15% O<sub>2</sub> ranged from 1 to 10 ppmv for those engines. However, another installation for a lean burn engine at a dairy is achieving the proposed 11 ppmv NO<sub>x</sub> limit with SCR. The most recent source test resulted in a NO<sub>x</sub> concentration of 5.63 ppmv @15% O<sub>2</sub> (a 93% NO<sub>x</sub> reduction).



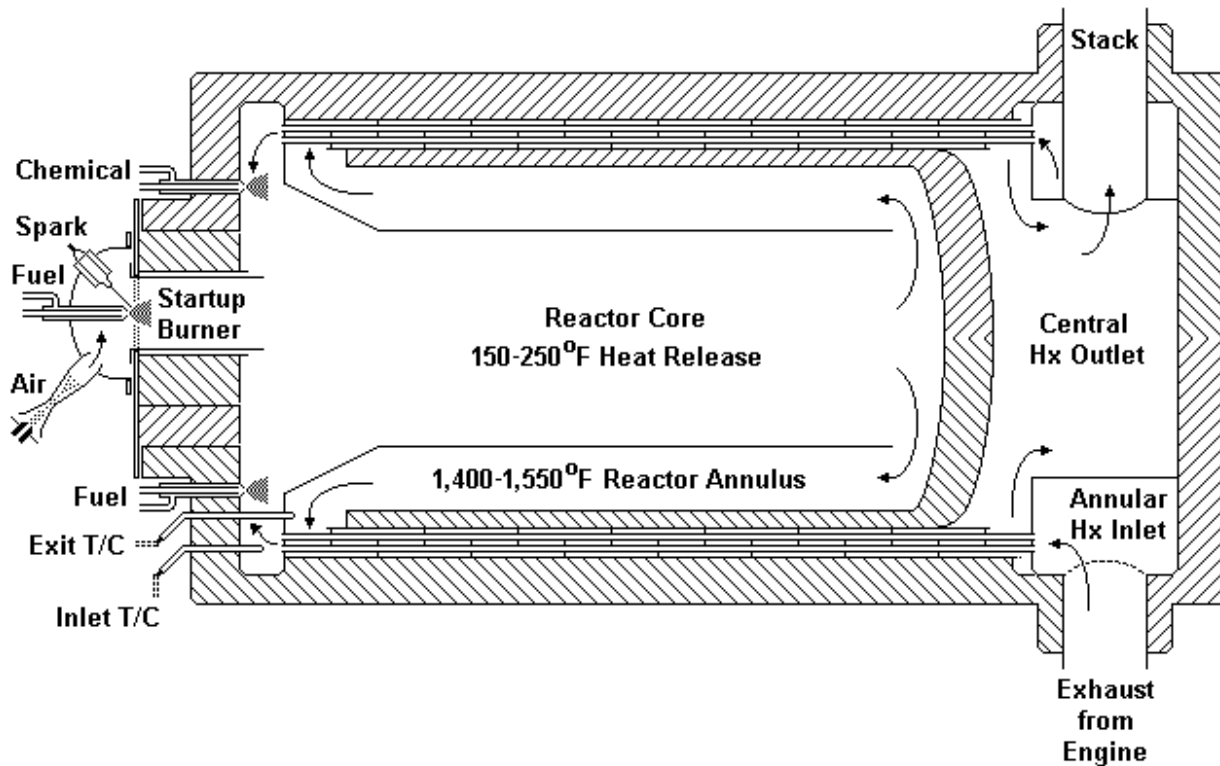
**Figure 2. Ox Mountain's Landfill Gas to Energy Facility in Half Moon Bay, CA**

## **NOXTECH**

NOxTech is another post combustion control technology which provides a selective non-catalytic reduction, does not require gas cleanup, and is capable of achieving multi-pollutant control of NO<sub>x</sub>, VOC, and CO. Engine exhaust gases enter the unit where the temperature is raised by a heat exchanger. The gases then enter a reaction chamber where a small amount of the engine's fuel is added to raise the gas temperature to 1400-1500°F. At this temperature in the reaction chamber, NO<sub>x</sub> reduction can occur using urea injection, while CO and VOC are simultaneously incinerated. The system is



designed to handle biogas that is of a lower BTU content than higher BTU natural gas. Natural gas has a BTU of 1,050 BTU per cubic foot, while biogas has a BTU range (depending of the methane content) of approximately 650 BTU per cubic foot.



**Figure 3. NOxTech System**

As mentioned in the Interim Technology Assessment, a full-scale demonstration of this technology occurred at Woodville Landfill in Tulare starting in 2006, which achieved favorable results. The NOxTech unit was able to achieve NOx, CO, and VOC emissions below the proposed rule limits while running on landfill gas and in combination with a diesel engine to produce more exhaust flow. This project operated for four and a half years until the landfill was no longer able to provide sufficient gas to the engine. Two NOxTech units were operated by Southern California Edison (SCE) on diesel engines on Catalina Island from 1995 to 2001. Staff has again requested information from SCE regarding its experience and performance from this demonstration project. In May 2010, Eastern Municipal Water District (EMWD) installed a NOxTech unit at its Mills Pumping Station in Riverside. This site operates three natural gas fired internal

combustion engines and the NOxTech unit is capable of handling the exhaust gas streams for multiple engines up to a maximum total rating of 1.5 MW (approximately 2000 bhp, depending on efficiency). While originally designed to treat exhaust gases from biogas engines, EMWD opted to test the NOxTech system with its natural gas-powered engines. The NOxTech system installed downstream of natural gas-powered engines at EMWD experienced some setbacks and was not able to achieve NOx levels that were in compliance with the proposed 11 ppmv rule limit in 2011 because the system was operating at higher than expected temperatures, resulting in higher than expected thermal NOx formation. The combustion of a higher BTU natural gas fuel also burns more quickly, elevating the exhaust temperatures. A variance was granted by the AQMD for the installation and additional testing of an Exhaust Gas Recirculation (EGR) system that is designed to lower the temperature enough to prevent excess NOx formation. This enhanced system commenced testing in April 2012 and has shown some promising results. The system is still being optimized to be able to consistently perform at the proposed emission levels. The installation of a new EGR fan this year is expected to handle the elevated exhaust temperatures in order to provide more recirculated exhaust gas to the unit and lower the NOx emissions further. A second NOxTech unit is set to begin installed to control the ~~construction at the~~ EMWD Temecula facility's digester gas-fired engines by the end of ~~later~~ this year.

For engines larger than 1.5 MW, an additional unit is required to handle the flow while a third unit is required for engines larger than 3 MW. Unlike with EMWD, a landfill application would not require an EGR system because there typically is no natural gas backup fuel to run through the unit and because of the lower BTU content of the landfill gas.

A NOxTech system can be a less costly installation than a traditional catalytic oxidation/SCR installation due in large part to the anticipated decreased operations and maintenance (O&M) costs. Periodic sorbent and catalyst replacements are a significant portion of the O&M costs incurred with the operation of a catalytic oxidation/SCR system. While urea injection is still a required component of a NOxTech system, it eliminates the need for any gas cleanup sorbents and post combustion catalysts.

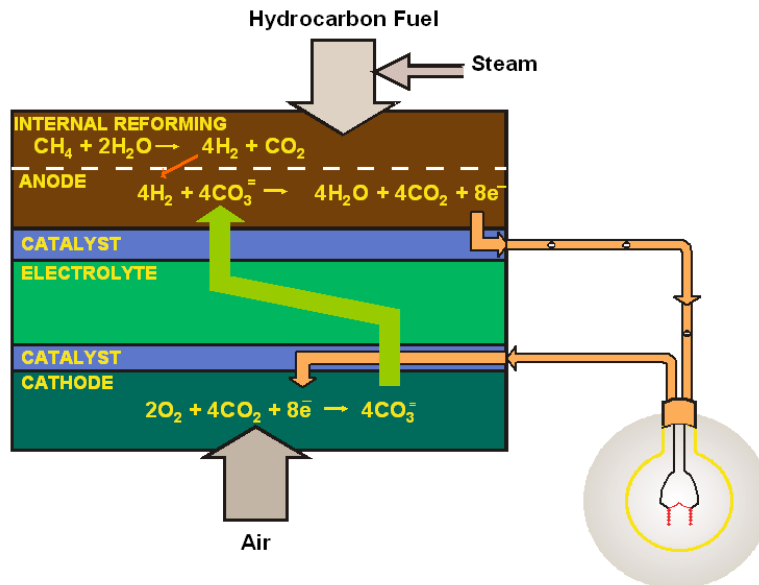
## ALTERNATIVE TECHNOLOGIES

This section provides a brief description of ~~fr~~ alternative technologies that can be utilized to produce power from biogas with a much lower criteria pollutant emissions profile than that of biogas-fueled IC engines.

### Fuel Cells

Fuel cells are an emerging technology capable of producing power with very low pollutant emissions without the utilization of combustion. In fact, fuel cells can produce electricity much more efficiently (between 45-50% efficiency) than combustion-based engines and turbines.

While there are a variety of fuel cell types available, fuel cells for biogas applicability use a molten carbonate cell to create an electrochemical reaction with the inlet biogas at the anode and oxygen from air at the cathode. Hydrogen is created in a reforming process at the anode, while carbonate ions are created at the cathode. The hydrogen gas reacts with the carbonate ions to produce water and electrons. These electrons flow through an external circuit that produces the electricity for the power plant.



**Figure 4. Fuel Cell Chemistry for Power Generation**

These electrochemical reactions are produced in individual molten carbonate electrolyte stacks. The stacks are modular in design, so the total power production capacity of the generating plant can be tailored to accommodate several fuel cell stacks to meet the desired power output. The heat generated by the fuel cells can also be recovered and

used to provide process heat. For instance, the recovered heat can be used to supply heat to a wastewater treatment plant's anaerobic digesters. The fuel cell stacks, however, are sensitive to impurities, so a gas cleanup system is critical to maintain the performance of the fuel cell stacks. Siloxanes, particularly, can foul a fuel cell.

There are many fuel cell installations that run on natural gas, but the activity of digester gas fuel cells in California is significant. There are five installations in the basin located at wastewater treatment plants that are designed to operate on biogas from anaerobic digesters. EMWD has installed a fuel cell power generating facility at the Moreno Valley Regional Water Reclamation Facility and at the Perris Valley facility, while the City of Rialto has also installed a digester gas fuel cell. The City of Riverside has installed a fuel cell system at its wastewater treatment plant and Inland Empire Utilities Agency (IEUA) has completed construction of a 2.8 MW fuel cell plant at its regional plant in Ontario that ~~began will begin~~ operating in June 2012 on natural gas, while digester gas will be gradually introduced into the system. It is the largest fuel cell that will be operating in the state. The installations at EMWD Moreno Valley and the City of Riverside have encountered some issues with the early design fuel cells. Specifically, the stacks were not producing the electrical output they are rated for. Fuel Cell Energy (FCE), the equipment manufacturer, is currently in the process of negotiations with the facility operator, which would involve replacing the fuel cell stacks at Riverside. EMWD Moreno Valley has restacked the fuel cells and is currently operating. It was found that the cause for the decreased fuel cell stack life was from poisoning by sulfur compounds that the gas cleanup system was not removing sufficiently. FCE now offers to handle the procurement of the gas treatment skid at the time a fuel cell is purchased along with its servicing, as well as aiding in the selection of a third party gas treatment vendor if an operator desires.

Additionally, there are 2 installations in the San Joaquin Valley in Tulare and Turlock. The Turlock installation is currently down because of a lack of digester gas fuel. Two installations are in the Bay Area at Dublin San Ramon (operating) and in San Jose (in the commissioning phase). There is also an installation in Oxnard that is operating well and in San Diego, a group of units will be started up. Fuel cells installed at wastewater treatment plants can take advantage of SGIP (Self-Generation Incentive Program) funds to offset the capital costs of installation.

An installation under a research permit is also currently underway at OCSA. This unit operates primarily on anaerobic digester gas with the ability to also run on natural gas or a blend of both. It is an experimental installation because the fuel cell operates in

conjunction with a hydrogen recovery unit that sends the recovered hydrogen gas to a nearby hydrogen fueling station for use by the public. This project is a collaboration of the United States Department of Energy (DOE), CARB, Air Products and Chemicals, and Fuel Cell Energy. It is expected to operate until 2014 and is intended to demonstrate an alternative energy source while reducing energy costs and reducing emissions. This fuel cell utilizes a gas cleanup system that removes sulfur compounds and, to date, has resulted in satisfactory performance of the fuel cell.

### Flex Energy

Flex Energy is a system that combines microturbine technology with that of regenerative thermal oxidation to produce power with an ultra low emissions profile and without the necessity of biogas cleanup. The system is capable of taking low BTU content biogas that would be otherwise incombustible by any engine or turbine and diluting it before introducing it to a flameless thermal oxidizer that raises the temperature to destroy VOC and CO. The thermal oxidizer's temperature is also not raised so high as to facilitate the formation of thermal NOx. This process results in the consumption of methane gas without the pollutants from traditional combustion.

An open landfill will produce gas with a more or less constant amount of methane, roughly 50%. The other 50% is typically CO<sub>2</sub>. However, once a landfill ceases to accept municipal solid waste, the amount of gas produced by the landfill will begin to decay gradually. A typical internal combustion engine that runs on landfill gas will struggle if the methane content of the biogas drops below 35-40%. Landfills that produce gas with a methane content lower than what an engine can use will typically send the gas to a flare for combustion. An advantage of the Flex Energy system is that it is capable of handling biogas with a methane content similar to what an engine consumes down to a level that is outside an engine's range of consumption. A Flex Energy system can consume landfill gas well after a landfill closes and well after an engine ceases operation due to the low methane content.

Another advantage with this type of system is that it does not require a fuel cleanup system for siloxanes and other impurities. Like the fuel cells, these systems can be modularly applied, based on the inlet characteristics of the biogas and desired power output.



**Figure 5. Flex Energy FP250 Flex Powerstation**

A pilot study of a Flex Energy installation was recently successfully completed at Lamb Canyon Landfill in Riverside County, CA. A Flex Energy installation is currently collecting data at a landfill in Fort Benning, GA, while approval has been granted for another installation at the Santiago Canyon Landfill in Orange County, set to begin operating later this year.

#### H<sub>2</sub> Assisted Lean Operation (HALO)

This emerging technology is based on injecting hydrogen gas into the inlet biogas stream before introduction into the engine's combustion chamber. Three to six percent hydrogen gas by mass in the fuel stream is sufficient to extend the lean limit combustion stability for the biogas fuel. Hydrogen's rapid combustion speed, wider combustion limit, and low ignition limit allows for a reduction in the exhaust emissions. There is no need for gas cleanup with the system and it takes up about a cubic meter of space. Some natural



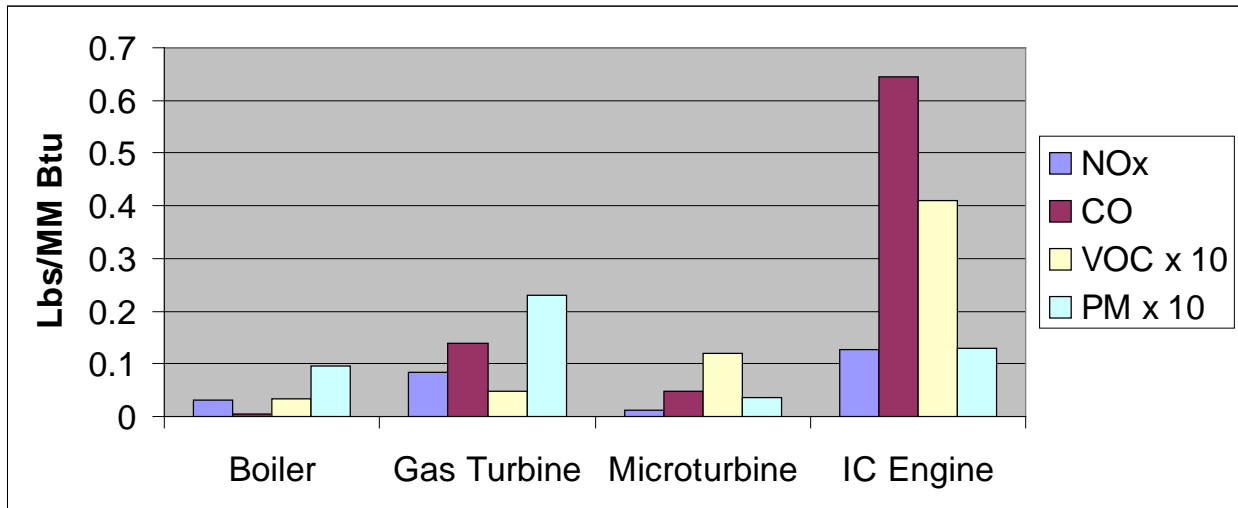
gas is required as feedstock for hydrogen production, but produces additional electrical output and heat that can benefit a biogas facility that utilizes waste heat. The addition of hydrogen reduces hydrocarbon and CO emissions, while the leaner burning fuel lowers the combustion temperature and, therefore, lowers NO<sub>x</sub> formation.

There is no need for gas cleanup or catalytic after-treatment with hydrogen injection and it has been tested by several engine manufacturers on natural gas engines. An added benefit is also an increase in the efficiency of an engine with hydrogen enrichment. A project with the City of San Bernardino Municipal Water Department is expected to commence at the latter part of 2012 on its two, 999 bhp, cogeneration engines.

### Other Combustion Technologies

Traditional gas turbines, boilers and flares fall under this category. Several landfills in the basin currently employ the use of gas turbines for the combustion of the biogas and also require extensive gas cleanup to protect the turbine blades from siloxane buildup. For example, the Calabasas Landfill operated by Los Angeles County Sanitation District and the Brea-Olinda Landfill currently use turbine technology with gas cleanup for handling landfill produced biogas. The Chiquita Canyon Landfill installation, operated by Ameresco, uses a TSA gas cleanup system similar to the one at Ox Mountain and is currently in the optimization phase. Traditional boilers can also process biogas and currently are being used by both landfills and wastewater treatment plants across the basin. For example, if a facility that operates both engines and boilers elects to shut down its engines, the remaining biogas may be handled by its boilers and any excess can be routed to the facility flare, if necessary. Boilers are less sensitive to impurities, do not require extensive gas cleanup, and can provide waste heat. The last resort for any facility that handles biogas, but cannot combust it because of an insufficient quantity or due to equipment decommissioning, would be to flare. With flaring, a facility can achieve VOC destruction from combustion, while many newer BACT flares achieve low NO<sub>x</sub> emissions. However, there are some possible CO<sub>2</sub> emission impacts from a greenhouse gas perspective and these will be discussed in another section of this document. There are also systems available that recover the heat from a flare for process heat or even for electrical generation. ABUTECH has produced a heat recovery flare that captures the waste heat for process utilization and a unit by UTC Power uses an organic Rankine cycle to recover the heat from a flare and produce up to 200 kW of electrical power.

Figure 6 shows a comparison between source test average emissions among different technologies. Boilers, gas turbines, and microturbines overall have lower emission profiles than IC engines.



**Figure 6. Emissions Comparison Among Different Biogas Electric Generation Technologies**

## COST AND COST EFFECTIVENESS

The cost and cost effectiveness analysis for this report relies on real data obtained from OCSD demonstration project. The pilot study demonstration project at OCSD is an example of an achieved in practice installation that has produced favorable results and that is cost effective. This installation used a digester gas cleanup system with a catalytic oxidizer and SCR for post-combustion emissions controls. In OCSD's case, additional structural work was required to support the placement of the catalytic oxidizer and SCR units. An overhead steel platform had to be constructed to support the equipment while allowing vehicle traffic to proceed underneath and to allow for urea deliveries.

The capital costs included the supporting steel necessary for the platform construction, while the annual operating costs included digester gas cleaning media replacement, oxidation catalyst and SCR catalyst replacement, and urea replacement. As a result of the gas cleanup system providing cleaner biogas to the engine, subsequent O&M costs to the engine itself were reduced as well as the frequency of maintenance operations.

The original vendor guarantee was three years for the catalysts, but near the end of the second year of operation (operating under a research permit), the CO emission levels began to rise. The emission levels got to just above 100 ppmv before the catalyst was removed from service and samples were sent for testing (average outlet CO ppm level was 7.5 ppmv during the pilot study). The results confirmed that there was some



deactivation of the catalyst evidenced by the presence of a variety of contaminants suspected to originate from the operation of the engine. Although there was an elevation in the CO emissions, this cannot constitute a catalyst failure since the outlet CO emissions were still in compliance with the proposed CO limit of 250 ppm before removed from service. The oxidation catalysts at Ox Mountain have experienced something similar and yet have been achieving compliance with Staff's proposed CO limit for almost three years. Despite this, a catalyst replacement interval of two years, instead of three years, has been applied as part of the cost analysis described in further detail below.

Emissions and emission reductions are calculated for NO<sub>x</sub>, VOC, and CO. The current emissions are calculated from the current Rule 1110.2 rule limits and permit limits, while the future emissions are calculated from the proposed Rule 1110.2 limits. Permit limits were used for some engines because they were permitted at BACT or have more stringent permit limits than in the current rule. For calculating cost effectiveness, the AQMD uses the Discounted Cash Flow (DCF) model, which takes into consideration both capital cost plus annual operating and maintenance costs. This use of this model is consistent with previous rulemaking proposals and past control measures because it links the cost of the project with its environmental benefits. The equipment is given a twenty year life and a 4% interest rate. The calculated present worth value (PWV) is then divided by the summation of the emission reductions over the length of the project (20 years). The emission reductions for CO are discounted by one seventh because of its ozone-formation potential is approximately one seventh from that of NO<sub>x</sub>.

The 2008 Interim Technology Assessment provided preliminary cost information for a non-regenerative siloxane removal system with oxidation catalyst and SCR, based on OCSD's pilot study cost estimates as the project was beginning. Table 6 provides a comparison between the cost estimates from the Interim Report and those obtained from OCSD's Final Report on its pilot study. The emission reductions in the Interim Report did not include those from CO and assumed an annual operation of 8,000 hours. This explains the difference in the cost effectiveness between the Interim Report and OCSD's final report.

**Table 6. Comparison of OCSD’s Costs for Pilot Study Installation and Operation**

	Interim Report	Final Report
Installed Equipment, \$	1,265,000	1,989,529
<i>Equipment minus Catalyst, \$</i>	<i>1,096,000</i>	<i>1,875,129</i>
<i>Catalyst Cost, \$</i>	<i>169,000</i>	<i>114,400</i>
Project Management & Installation Supervision, \$	285,000	298,429
<b>Total Initial Investment, \$</b>	<b>1,550,000</b>	<b>2,287,958</b>
Sorbent Replacement, \$/yr	62,000	40,000
Catalyst Replacement, \$/yr (3 year replacement)	56,000	38,133
Reactant, \$/yr	15,238	18,900
Reduced Power Production, \$/yr	2,363	1,200
Equipment Maintenance, \$/yr	-7,440	-30,147
<b>Total Annual Cost, \$</b>	<b>128,161</b>	<b>58,950</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>3,360,916</b>	<b>3,089,089</b>
NOx Reductions	15.18	10.7
VOC Reductions	2.20	14.6
CO Reductions	0	64.9
<b>Cost Effectiveness (\$/ton NOx+VOC+CO/7)</b>	<b>11,100</b>	<b>4,500*</b>
<b>\$/kW-hr</b>	<b>0.08</b>	<b>0.01</b>

\*This figure is based on permit-specific limits that are lower than the current Rule 1110.2 limits and on 6,000 annual operating hours.

The actual capital costs were higher than was estimated in the Interim Report, but the operation and maintenance costs were actually lower due to the reduced engine maintenance and emission fee credits from the lower emissions. The calculated cost effectiveness of OCSD’s 3471 bhp engine and based on the Final Report is \$4,500 per ton of NOx, VOC, and CO/7. OCSD’s permit limits for its demonstration project engine are 45ppmv NOx, 209 ppmv VOC, and 590 ppmv CO. Some facilities such as OCSD use the efficiency correction factor (ECF) to operate at a slightly higher NOx and/or VOC limit, for example.

The installation and operating costs for OCSD’s system were scaled across a series of varying digester gas engine sizes representative of the current population. OCSD’s cost effectiveness was calculated based on 6,000 annual operating hours for the pilot study. The cost effectiveness for this analysis is based on 8,000 operating hours. 8,000 hours was used as a typical usage level for the engines analyzed for the Interim Report. Emissions reductions are calculated from the current Rule 1110.2 rule and permit limits to the proposed Rule 1110.2 limits. Table 7 summarizes these results for digester gas at the base level. The base level assumes a catalyst replacement every two years and the

sorbent costs from the pilot study. The cost effectiveness range for digester gas is between \$1,700 and \$3,500 per ton of NO<sub>x</sub>, VOC, and CO/7.

**Table 7. Base Level Cost Effectiveness for Digester Gas Engines Based on OCSD's Actual Costs**

BHP	4200	3471	1600	1000	500	250
<b>Installed Equipment, \$</b>	<b>2,240,791</b>	<b>1,989,529</b>	<b>1,230,965</b>	<b>921,665</b>	<b>602,807</b>	<b>395,072</b>
<i>Equipment minus Catalyst, \$</i>	2,102,364	1,875,129	1,178,231	888,707	586,328	386,832
<i>Catalyst Cost, \$</i>	138,427	114,400	52,734	32,959	16,479	8,240
Project Management & Installation Supervision, \$	361,107	298,429	137,565	85,978	42,989	21,494
<b>Total Initial Investment, \$</b>	<b>2,601,898</b>	<b>2,287,958</b>	<b>1,368,529</b>	<b>1,007,643</b>	<b>645,796</b>	<b>416,566</b>
Sorbent Replacement, \$/yr	48,401	40,000	18,438	11,524	5,762	2,881
Catalyst Replacement, \$/yr (every 2 yr)	69,213	57,200	26,367	16,479	8,240	4,120
Reactant, \$/yr	22,869	18,900	8,712	5,445	2,723	1,361
Reduced Power Production, \$/yr	2,859	1,200	1,089	681	340	170
Equipment Maintenance, \$/yr	-36,479	-30,147	-13,897	-8,685	-4,343	-2,171
<b>Total Annual Cost, \$</b>	<b>106,865</b>	<b>87,153</b>	<b>40,710</b>	<b>25,444</b>	<b>12,722</b>	<b>6,361</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>4,054,188</b>	<b>3,472,367</b>	<b>1,921,783</b>	<b>1,353,427</b>	<b>818,688</b>	<b>503,012</b>
NO <sub>x</sub> Reduction, tpy	12.6	10.5	4.8	3	1.5	1
VOC Reduction, tpy	29	24	11.1	6.9	3.5	1.7
CO Reduction, tpy	538.9	445.4	205.3	128.3	64.2	32.1
CO Reduction/7, tpy	77.0	63.6	29.3	18.3	9.2	4.6
<b>Cost Effectiveness, \$ per ton of NO<sub>x</sub>+VOC+CO/7 \$/kW-hr</b>	<b>1700</b>	<b>1800</b>	<b>2100</b>	<b>2400</b>	<b>2900</b>	<b>3500</b>
	<b>0.008</b>	<b>0.009</b>	<b>0.010</b>	<b>0.012</b>	<b>0.014</b>	<b>0.017</b>

OCSD's actual equipment costs (gas cleanup, oxidation catalyst, SCR, platform) and operating costs (with catalyst change outs every two years) were also applied to landfill gas engines to determine their cost effectiveness. The equipment costs were increased to account for the higher inlet gas volume per BTU supplied to the engine. The cost effectiveness range for landfill gas is between \$2,300 and \$2,900 per ton of NO<sub>x</sub>, VOC, and CO/7. The base level cost effectiveness for this analysis is based on 8,000 operating hours and is summarized in Table 8.

**Table 8. Base Level Cost Effectiveness for Landfill Gas Engines Based on OCSD's Actual Costs**

BHP	4200	3471	2700	2000	1500
<b>Installed Equipment, \$</b>	<b>2,345,061</b>	<b>2,082,529</b>	<b>1,781,763</b>	<b>1,479,753</b>	<b>1,239,133</b>
<i>Equipment minus Catalyst, \$</i>	<i>2,206,634</i>	<i>1,968,129</i>	<i>1,692,774</i>	<i>1,413,835</i>	<i>1,189,695</i>
<i>Catalyst Cost, \$</i>	<i>138,427</i>	<i>114,400</i>	<i>88,989</i>	<i>65,918</i>	<i>49,438</i>
Project Management & Installation Supervision, \$	361,107	298,429	232,140	171,956	128,967
<b>Total Initial Investment, \$</b>	<b>2,706,168</b>	<b>2,380,958</b>	<b>2,013,903</b>	<b>1,651,708</b>	<b>1,368,100</b>
Sorbent Replacement, \$/yr	48,401	40,000	31,115	23,048	17,286
Catalyst Replacement, \$/yr (every 2 yr)	69,213	57,200	44,494	32,959	24,719
Reactant, \$/yr	22,869	18,900	14,702	10,890	8,168
Reduced Power Production, \$/yr	1,664	1,200	1,069	792	594
Equipment Maintenance, \$/yr	-36,479	-30,147	-23,451	-17,371	-13,028
<b>Total Annual Cost, \$</b>	<b>105,669</b>	<b>87,153</b>	<b>67,930</b>	<b>50,319</b>	<b>37,739</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>4,142,210</b>	<b>3,565,367</b>	<b>2,937,073</b>	<b>2,335,538</b>	<b>1,880,972</b>
NOx Reduction, tpy	12.6	10.5	8.1	6	4.5
VOC Reduction, tpy	1.3	1.1	0.8	0.6	0.5
CO Reduction, tpy	538.9	445.4	346.4	256.6	192.5
CO Reduction/7, tpy	77.0	63.6	49.5	36.7	27.5
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7 \$/kW-hr</b>	<b>2300</b>	<b>2400</b>	<b>2500</b>	<b>2700</b>	<b>2900</b>
	<b>0.009</b>	<b>0.009</b>	<b>0.009</b>	<b>0.010</b>	<b>0.011</b>

\*The equipment costs were increased by \$93,000 to account for the siloxane cleanup system's processing of a greater gas volume per BTU supplied to the engine

Several stakeholders have expressed concern over the high cost of gas cleanup, primarily to address the removal of siloxanes from the biogas inlet stream. In addition, all facilities have varying levels of impurities in the biogas and some may have to install additional pretreatment for sulfur compounds if the levels are high. Redundant siloxane removal systems are a necessity and must be capable of handling the base siloxane load as well as intermittent spikes. To address these concerns in the cost analysis, Staff analyzed two other scenarios where additional gas treatment contingencies were added to the operational costs. These costs are based on vendor quotes for the full scale of flow rates of all the affected biogas facilities. The media costs were then normalized to obtain "per engine" costs, which were then bracketed to the appropriate engine brake horsepower sizes. The carbon media change-out frequency is dependent on the siloxane level; the higher the siloxane level, the more frequent the media change-out. The cost of the media

is correlated to the media weight relative to the flow rate and vessel size. Staff has assumed a worst case where media change-outs will be required once per month.

On top of this, Staff also included a 20% contingency to the equipment costs to account for any additional gas cleanup required or to account for backpressure considerations in smaller engines or for additional compression and chilling equipment. Vendor supplied equipment costs are in line with the scaled costs from the base scenario for both gas cleanup and catalytic after-treatment. The operating costs are the major contributor to the overall cost of the gas cleanup system. The following two tables (Tables 9 and 10) represent the worst case costs with the additional gas cleanup and the additional 20% equipment cost contingency applied.

**Table 9. Cost Effectiveness for Digester Gas Engines Based on OCSD’s Actual Costs with Additional Contingencies**

BHP	4200	3471	1600	1000	500	250
Installed Equipment, \$	2,240,791	1,989,529	1,230,965	921,665	602,807	395,072
<i>Equipment minus Catalyst, \$</i>	2,102,364	1,875,129	1,178,231	888,707	586,328	386,832
<i>Added Cleanup w/20% contingency</i>	420,473	375,026	235,646	177,741	117,266	77,366
<i>Catalyst Cost, \$</i>	138,427	114,400	52,734	32,959	16,479	8,240
<b>Installed Equipment w/20% contingency, \$</b>	<b>2,661,264</b>	<b>2,364,555</b>	<b>1,466,611</b>	<b>1,099,407</b>	<b>720,073</b>	<b>472,438</b>
Project Management & Installation Supervision, \$	361,107	298,429	137,565	85,978	42,989	21,494
<b>Total Initial Investment, \$</b>	<b>3,022,371</b>	<b>2,662,984</b>	<b>1,604,176</b>	<b>1,185,384</b>	<b>763,062</b>	<b>493,933</b>
Sorbent Replacement, \$/yr	165,600	138,000	69,000	103,500	51,570	12,420
Catalyst Replacement, \$/yr (every 2yr)	69,213	57,200	26,367	16,479	8,240	4,120
Reactant, \$/yr	22,869	18,900	8,712	5,445	2,723	1,361
Reduced Power Production, \$/yr	2,859	1,200	1,089	681	340	170
Equipment Maintenance, \$/yr	-36,479	-30,147	-13,897	-8,685	-4,343	-2,171
<b>Total Annual Cost, \$</b>	<b>224,064</b>	<b>185,153</b>	<b>91,272</b>	<b>117,420</b>	<b>58,530</b>	<b>15,900</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>6,067,395</b>	<b>5,179,213</b>	<b>2,844,560</b>	<b>2,781,121</b>	<b>1,558,484</b>	<b>710,013</b>
NOx Reduction, tpy	12.6	10.5	4.8	3	1.5	1
VOC Reduction, tpy	29	24	11.1	6.9	3.5	1.7
CO Reduction, tpy	538.9	445.4	205.3	128.3	64.2	32.1
CO Reduction/7, tpy	77.0	63.6	29.3	18.3	9.2	4.6
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7 \$/kW-hr</b>	<b>2600</b>	<b>2600</b>	<b>3100</b>	<b>4900</b>	<b>5500</b>	<b>4900</b>
	<b>0.012</b>	<b>0.013</b>	<b>0.015</b>	<b>0.024</b>	<b>0.027</b>	<b>0.025</b>

**Table 10. Cost Effectiveness for Landfill Gas Engines Based on OCSD's Actual Costs with Additional Contingencies**

BHP	4200	3471	2700	2000	1500
Installed Equipment, \$	2,345,061	2,082,529	1,781,763	1,479,753	1,239,133
<i>Equipment minus Catalyst, \$</i>	2,206,634	1,968,129	1,692,774	1,413,835	1,189,695
<i>Added Cleanup w/20% contingency</i>	441,327	393,626	338,555	282,767	237,939
<i>Catalyst Cost, \$</i>	138,427	114,400	88,989	65,918	49,438
<b>Installed Equipment w/20% contingency, \$</b>	<b>2,786,388</b>	<b>2,476,155</b>	<b>2,120,318</b>	<b>1,762,520</b>	<b>1,477,072</b>
Project Management & Installation Supervision, \$	361,107	298,429	232,140	171,956	128,967
<b>Total Initial Investment, \$</b>	<b>3,147,495</b>	<b>2,774,584</b>	<b>2,352,458</b>	<b>1,934,475</b>	<b>1,606,039</b>
Sorbent Replacement, \$/yr	276,000	276,000	138,000	207,000	103,500
Catalyst Replacement, \$/yr (every 2yr)	69,213	57,200	44,494	32,959	24,719
Reactant, \$/yr	22,869	18,900	14,702	10,890	8,168
Reduced Power Production, \$/yr	1,664	1,200	1,069	792	594
Equipment Maintenance, \$/yr	-36,479	-30,147	-23,451	-17,371	-13,028
<b>Total Annual Cost, \$</b>	<b>333,268</b>	<b>323,153</b>	<b>174,815</b>	<b>234,270</b>	<b>123,953</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>7,676,607</b>	<b>7,166,233</b>	<b>4,728,196</b>	<b>5,118,211</b>	<b>3,290,558</b>
NOx Reduction, tpy	12.6	10.5	8.1	6	4.5
VOC Reduction, tpy	1.3	1.1	0.8	0.6	0.5
CO Reduction, tpy	538.9	445.4	346.4	256.6	192.5
CO Reduction/7, tpy	77.0	63.6	49.5	36.7	27.5
<b>Cost Effectiveness, \$ per ton of</b>					
<b>NOx+VOC+CO/7</b>	<b>4200</b>	<b>4800</b>	<b>4000</b>	<b>5900</b>	<b>5100</b>
<b>\$/kW-hr</b>	<b>0.016</b>	<b>0.018</b>	<b>0.015</b>	<b>0.022</b>	<b>0.019</b>

The worst case costs, along with the base case costs were plotted on the following two graphs for digester gas and landfill gas (Figure 7 and Figure 8). Since every facility is unique in the flow rate, engine size, and number of engines installed, the bracketed sorbent replacement costs are not necessarily linear. However, there is a sufficient correlation to apply a polynomial regression to each curve (with additional gas cleanup and with 20% additional contingency) and be able to represent them here. The worst case scenario cost effectiveness range for digester gas is from \$2,600 to \$5,500 per ton and from \$4,200 to \$5,900 per ton for landfills.

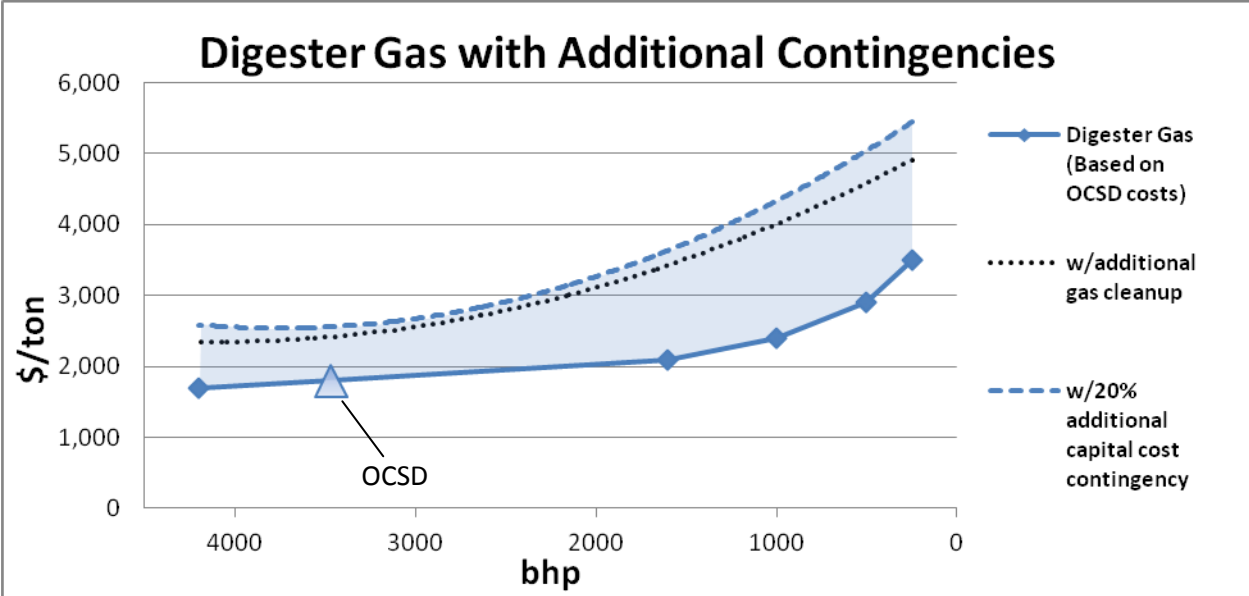


Figure 7. Cost Effectiveness for Digester Gas (Catalytic Aftertreatment)

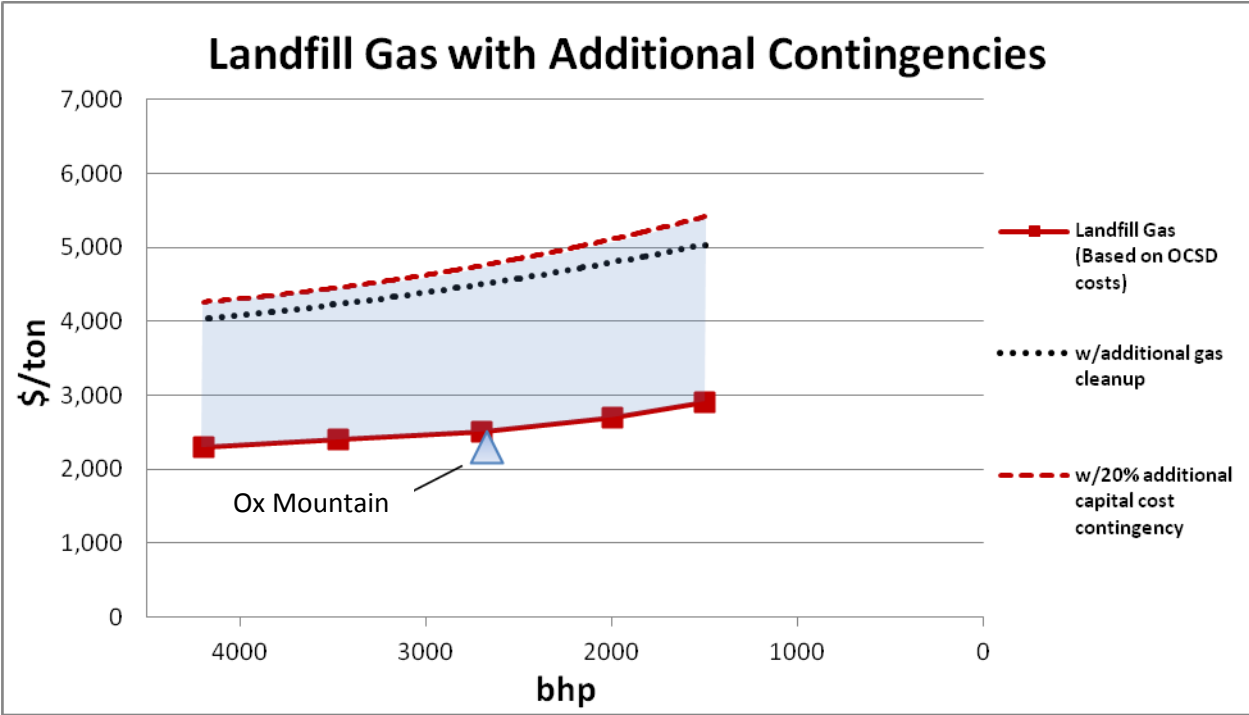


Figure 8. Cost Effectiveness for Landfill Gas (Catalytic Aftertreatment)

Cost data was also received from the Bay Area AQMD for the installation at Ox Mountain Landfill's 2,677 bhp engine with regenerative temperature swing adsorption (TSA) gas cleanup, oxidation catalyst, and SCR (Table 9). There are six total engines at that facility. Cost effectiveness was calculated from SCAQMD rule limits to the proposed rule limits, operating 8,000 hours per year. There may be an increased capital cost for a regenerative TSA system, but the total gas cleanup cost was divided by 6 to arrive at the per-engine estimate. The cost effectiveness for Ox Mountain is within the range of Staff's estimates for the proposed amendments (Figure 8). The annual costs presented here do not reflect any credit taken for reduced engine maintenance, so the actual operating costs may be lower than those in Table 11. From Ox Mountain's experience, the sorbent change-outs could be longer than once every twelve months.



**Table 11. Cost Effectiveness of Landfill Installation with Regenerative Gas Cleanup, Oxidation Catalyst, and SCR**

<i>Capital Costs*</i>	
TSA System, \$	271,544
TSA Installation, \$	91,480
TSA Flare, \$	25,105
TSA Flare Install, \$	6,699
SCR System, \$	46,218
SCR Install, \$	28,960
Ox Cat System, \$	38,218
Ox Cat Install, \$	28,377
CEMS, \$	170,165
CEMS Install, \$	20,080
Design & Eng (3.4% of equip), \$	18,742
Const & Comm (8% of equip), \$	44,100
<b>Total Installed Cost, \$</b>	<b>789,688</b>
 <i>Operating Costs</i>	
TSA, \$	14,000
Flare, \$	2,917
CEMS, \$	34,600
SCR, \$	51,394
Ox Cat, \$	12,514
Labor, \$	10,000
Electricity, \$	8,790
<b>Total Annual Op Costs, \$</b>	<b>134,215</b>
 <b>PWV (20 yrs @4%), \$</b>	 <b>2,613,673</b>
 NOx Reduction, tpy	 8.1
VOC Reduction, tpy	0.8
CO Reduction, tpy	343.5
CO Reduction/7, tpy	49.1
<b>Cost Effectiveness, \$ per ton of</b>	
<b>NOx+VOC+CO/7</b>	<b>2,300</b>
<b>\$/kW-hr</b>	<b>0.008</b>

\*TSA system costs were divided by 6 to reflect a per-engine basis estimate

### NOxTech Cost Effectiveness

Cost information was also obtained from NOxTech based on its installation at Eastern Municipal Water District's (EMWD) Mills Station. EMWD also submitted cost data

reflecting the additional costs to install an EGR unit as it is currently undergoing further testing for its demonstration. For the cost effectiveness analysis, EMWD’s additional costs amounted to a contingency for the installation costs of the NOxTech unit with EGR and its associated equipment. The addition of an EGR system is not anticipated to be required on landfill gas installations, so the contingency will be applied only to digester gas engines. The total amounts of contingency cost experienced by EMWD are not expected to be incurred by subsequent users. Table 11 shows the base level based on costs submitted by NOxTech for digester gas engines, while Table 12 shows the additional contingencies. Table 13 shows the base level only for landfill gas engines.

**Table 11. Base Level Cost Effectiveness for Digester Gas Engines Based on NOxTech Costs**

BHP	4200	3471	1600	1350	1000	500	250
<b>Installed Equipment, \$</b>							
Equipment Cost, \$	960,000	800,000	400,000	400,000	400,000	400,000	400,000
Installation Cost, \$	250,000	200,000	100,000	100,000	100,000	100,000	100,000
Project Management & Installation Supervision, \$	31,742	26,452	13,226	13,226	13,226	13,226	13,226
<b>Total Initial Investment, \$</b>	<b>1,241,742</b>	<b>1,026,452</b>	<b>513,226</b>	<b>513,226</b>	<b>513,226</b>	<b>513,226</b>	<b>513,226</b>
Reactant, \$/yr	37,952	31,365	14,458	12,199	9,036	4,518	2,259
Reduced Power Production, \$/yr	68,365	56,499	26,044	21,975	16,277	8,139	4,069
Equipment Maintenance, \$/yr	16,000	16,000	8,100	8,100	8,100	8,100	8,100
<b>Total Annual Cost, \$</b>	<b>122,318</b>	<b>103,864</b>	<b>48,602</b>	<b>42,274</b>	<b>33,414</b>	<b>20,757</b>	<b>14,428</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>2,904,042</b>	<b>2,437,965</b>	<b>1,173,728</b>	<b>1,087,724</b>	<b>967,319</b>	<b>795,312</b>	<b>709,308</b>
NOx Reduction, tpy	12.6	10.5	4.8	4.1	3	1.5	1
VOC Reduction, tpy	29	24	11.1	9.3	6.9	3.5	1.7
CO Reduction, tpy	538.9	445.4	205.3	173.2	128.3	64.2	32.1
CO Reduction/7, tpy	77.0	63.6	29.3	24.7	18.3	9.2	4.6
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7 \$/kW-hr</b>	<b>1200</b>	<b>1200</b>	<b>1300</b>	<b>1400</b>	<b>1700</b>	<b>2800</b>	<b>4900</b>
	<b>0.006</b>	<b>0.006</b>	<b>0.006</b>	<b>0.007</b>	<b>0.008</b>	<b>0.014</b>	<b>0.025</b>

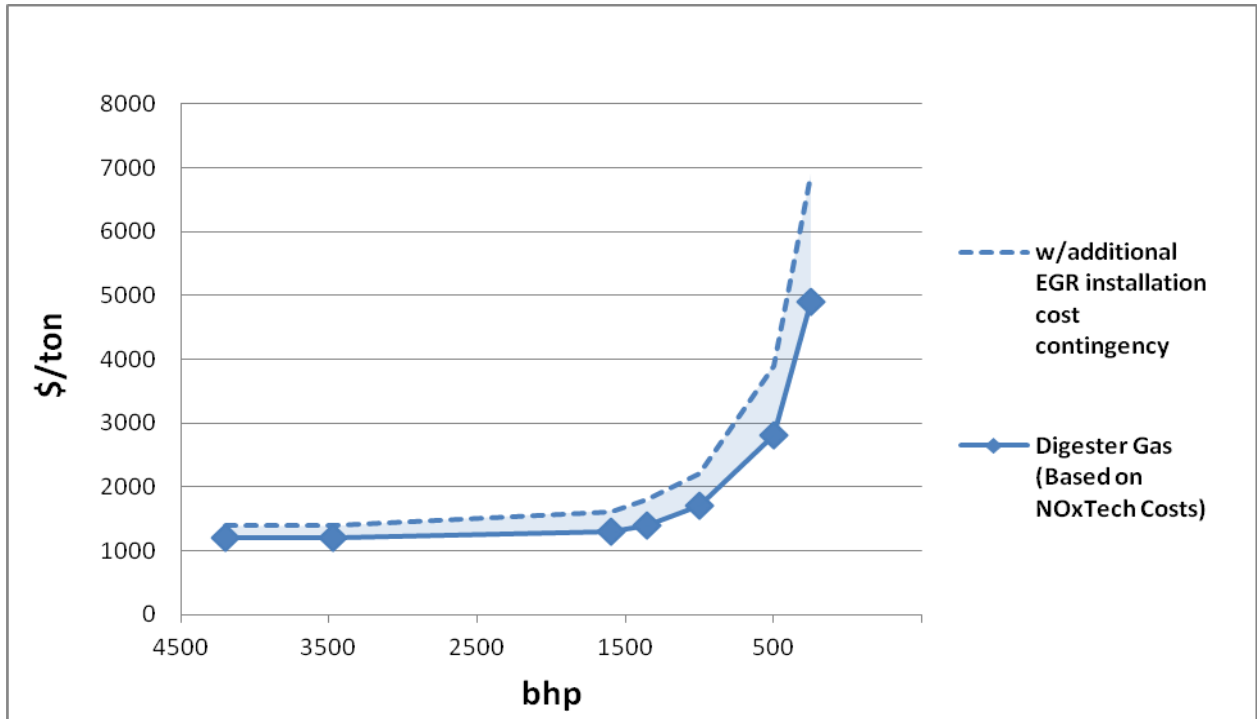
**Table 12. Cost Effectiveness for Digester Gas Engines Based on EMWD's Costs  
with Additional Contingencies**

BHP	4200	3471	1600	1350	1000	500	250
<b>Installed Equipment, \$</b>							
<i>Equipment Cost, \$</i>	960,000	800,000	400,000	400,000	400,000	400,000	400,000
<i>Installation Cost, \$</i>	250,000	200,000	100,000	100,000	100,000	100,000	100,000
<i>Installation Cost Contingency, \$</i>	300,000	300,000	300,000	300,000	300,000	300,000	300,000
Project Management & Installation Supervision, \$	31,742	26,452	13,226	13,226	13,226	13,226	13,226
<b>Total Initial Investment, \$</b>	<b>1,541,742</b>	<b>1,326,452</b>	<b>813,226</b>	<b>813,226</b>	<b>813,226</b>	<b>813,226</b>	<b>813,226</b>
Reactant, \$/yr	37,952	31,365	14,458	12,199	9,036	4,518	2,259
Reduced Power Production, \$/yr	68,365	56,499	26,044	21,975	16,277	8,139	4,069
Equipment Maintenance, \$/yr	16,000	16,000	8,100	8,100	8,100	8,100	8,100
<b>Total Annual Cost, \$</b>	<b>122,318</b>	<b>103,864</b>	<b>48,602</b>	<b>42,274</b>	<b>33,414</b>	<b>20,757</b>	<b>14,428</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>3,204,042</b>	<b>2,737,965</b>	<b>1,473,728</b>	<b>1,387,724</b>	<b>1,267,319</b>	<b>1,095,312</b>	<b>1,009,308</b>
NOx Reduction, tpy	12.6	10.5	4.8	4.1	3	1.5	1
VOC Reduction, tpy	29	24	11.1	9.3	6.9	3.5	1.7
CO Reduction, tpy	538.9	445.4	205.3	173.2	128.3	64.2	32.1
CO Reduction/7, tpy	77.0	63.6	29.3	24.7	18.3	9.2	4.6
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7 \$/kW-hr</b>	<b>1400</b> <b>0.007</b>	<b>1400</b> <b>0.007</b>	<b>1600</b> <b>0.008</b>	<b>1800</b> <b>0.009</b>	<b>2200</b> <b>0.011</b>	<b>3900</b> <b>0.019</b>	<b>6900</b> <b>0.035</b>

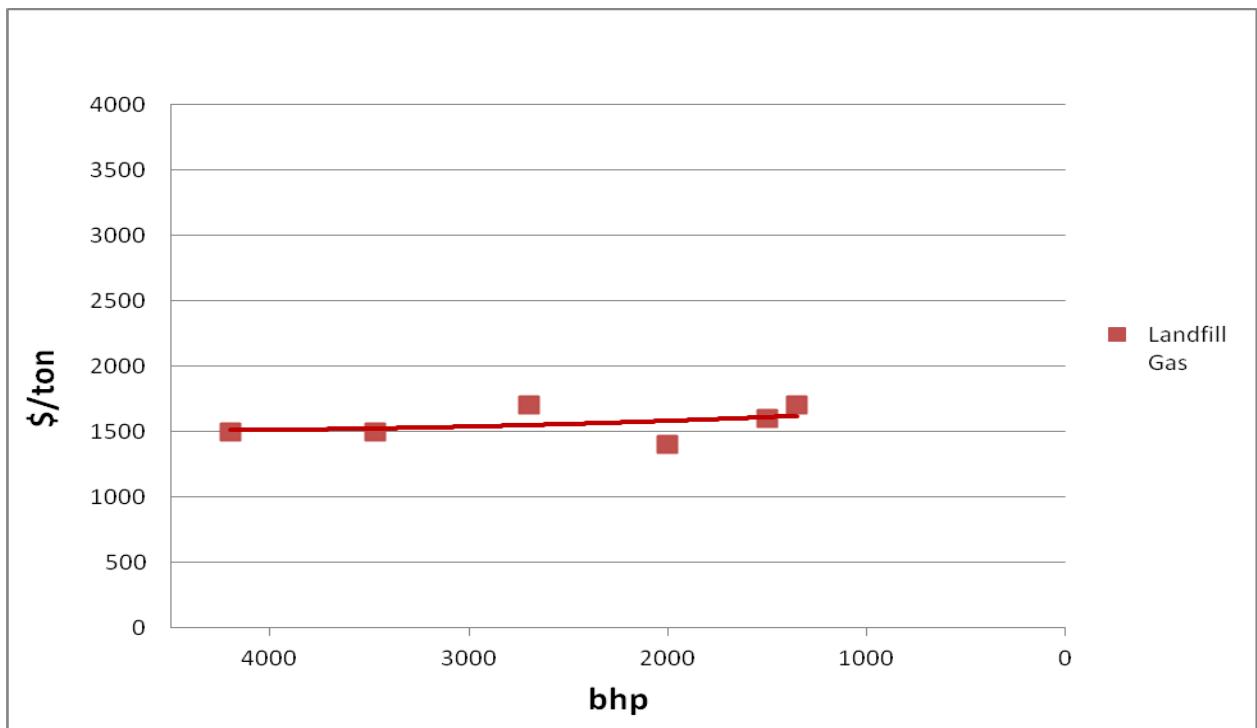
**Table 13. Base Level Cost Effectiveness for Landfill Gas Engines Based on NOxTech Costs**

BHP	4200	3471	2700	2000	1500	1350
<b>Installed Equipment, \$</b>						
<i>Equipment Cost, \$</i>	960,000	800,000	800,000	400,000	400,000	400,000
<i>Installation Cost, \$</i>	250,000	200,000	200,000	100,000	100,000	100,000
Project Management & Installation Supervision, \$	31,742	26,452	26,452	13,226	13,226	13,226
<b>Total Initial Investment, \$</b>	<b>1,241,742</b>	<b>1,026,452</b>	<b>1,026,452</b>	<b>513,226</b>	<b>513,226</b>	<b>513,226</b>
Reactant, \$/yr	37,952	31,365	24,398	18,073	13,554	12,199
Reduced Power Production, \$/yr	53,041	43,834	34,098	25,258	18,943	17,049
Equipment Maintenance, \$/yr	16,000	16,000	16,000	8,100	8,100	8,100
<b>Total Annual Cost, \$</b>	<b>106,993</b>	<b>91,199</b>	<b>74,496</b>	<b>51,430</b>	<b>40,598</b>	<b>37,348</b>
<b>Present Value of 20-yr Cost, \$</b>	<b>2,695,780</b>	<b>2,265,852</b>	<b>2,038,847</b>	<b>1,212,161</b>	<b>1,064,947</b>	<b>1,020,783</b>
NOx Reduction, tpy	12.6	10.5	8.1	6	4.5	4.1
VOC Reduction, tpy	1.3	1.1	0.8	0.6	0.5	0.4
CO Reduction, tpy	538.9	445.4	346.4	256.6	192.5	173.2
CO Reduction/7, tpy	77.0	63.6	49.5	36.7	27.5	24.7
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7 \$/kW-hr</b>	<b>1500</b>	<b>1500</b>	<b>1700</b>	<b>1400</b>	<b>1600</b>	<b>1700</b>
	<b>0.006</b>	<b>0.006</b>	<b>0.007</b>	<b>0.005</b>	<b>0.006</b>	<b>0.007</b>

Figures 9 and 10 illustrate the cost effectiveness for NOxTech graphically. For digester gas, the shaded band reflects the possible contingency costs in relation to the base level costs. For landfills, the modular nature of the base level equipment costs from NOxTech result in a slightly less than linear representation. However, there is sufficient correlation to apply a regression that results in the curve illustrated in Figure 10.



**Figure 9. Cost Effectiveness for Digester Gas Based on NOxTech Costs with Additional Contingencies**



**Figure 10. Cost Effectiveness for Landfill Gas Based on NOxTech Costs**

The cost effectiveness estimates presented here are within the range of cost effectiveness estimates presented to the Governing Board for past rulemakings. Digester gas and landfill gas engines of all sizes are shown to be cost-effective for all scenarios. The dollars per kilowatt-hour estimates (which assume a 97% generator efficiency) also show that the addition of emission controls is cheaper than the cost of electricity from the grid which runs about 8 to 10 cents per kilowatt-hour.

## **GLOBAL WARMING IMPACTS**

The Adopting Board Resolution for the February 1, 2008 amendment of Rule 1110.2 directed AQMD staff to prepare a Technology Assessment including a summary of potential trade-offs between greenhouse gas (GHG) and criteria pollutant emissions due to the adoption of the proposed biogas emission limits (NO<sub>x</sub> limit of 11 ppm (referenced to 15% O<sub>2</sub>), VOC limit of 30 ppm and CO limit of 250 ppm). Operation of the IC engines using biogas to produce electrical power generates the three criteria pollutants NO<sub>x</sub>, VOC and CO. If the operators of those engines elect to cease power generation then the biogas must be flared or redirected to another usage onsite including fueling boilers. The choice to generate power or not leads to a trade-off: upgrade the power generation emissions controls to obtain a cleaner emissions profile or potentially shutdown the internal power generation and flare but in doing so release more greenhouse gases. The following discussion provides a comparison of the impacts the two options present: criteria pollutant emissions and greenhouse gas emissions from operation of the IC engines vs. flaring.

### **Criteria Pollutant Impact**

Figures 11 through 13 compare emissions of criteria pollutants from existing engines, an engine meeting the proposed limits and biogas flares at facilities affected by the proposed biogas emission limits. The range of flare emissions shown in the following figures represents the variety of permit limits and operating conditions for flares at affected facilities. The permit emissions limits vary because the age of flares at these facilities ranges from less than 10 years to 40 years old. The emissions for each technology include the direct emissions from fuel combustion (natural gas). The flare emissions also include the criteria emissions from local utility power plants when biogas is directed to flares instead of being used to generate electricity using IC engines.

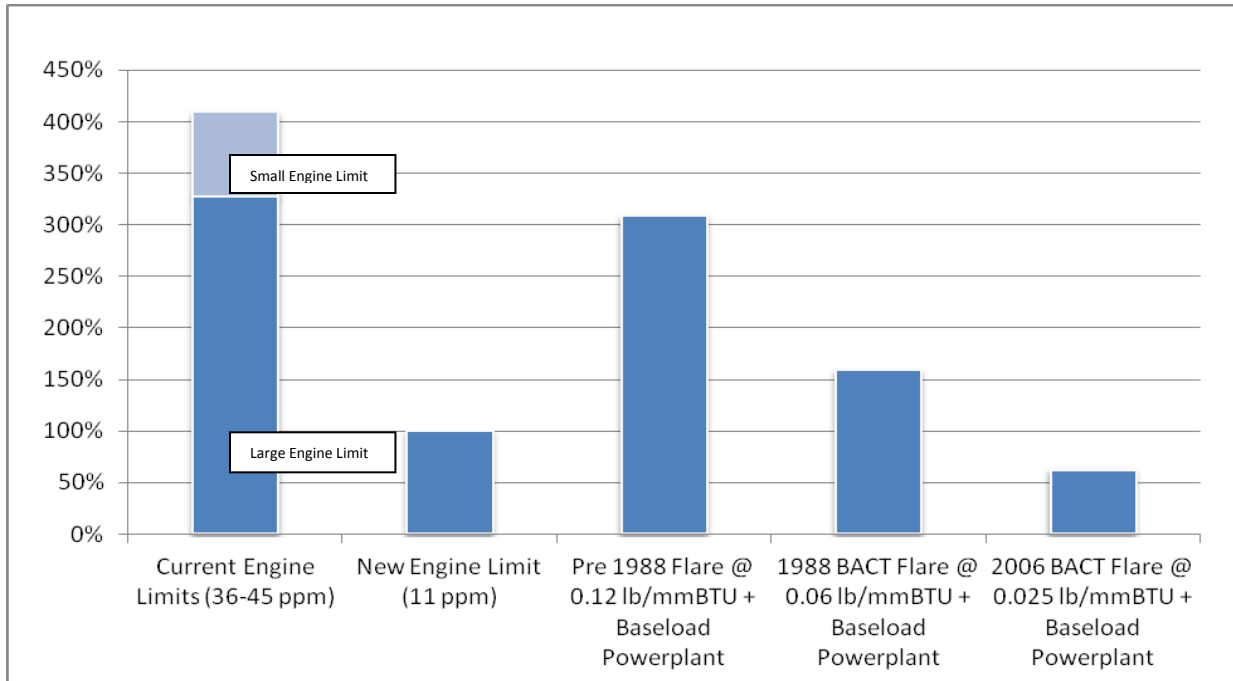
The NO<sub>x</sub>, VOC and CO emissions comparisons depicted in Figures 11 through 13 are expressed as a percent compared to the proposed engine emission limits – a ratio of the

current and proposed emission limits in ppm or pounds of emissions per Btu of fuel consumed. In addition, Figures 11 and 12 show the range of the current NO<sub>x</sub> and VOC emission limits for large and small engines. Also included in the three figures are the estimates of flare emissions and the emissions from a large power plant. These emissions are included because when an engine is shut down, the replacement electricity is assumed to be generated by a local utility boiler or combined cycle turbine.

The comparison of criteria pollutant emissions from engines and flares uses the ratio of the emission limit for the specific technology to the emission factor for an engine meeting the proposed biogas emission limits (NO<sub>x</sub> limit of 11 ppm (referenced to 15% O<sub>2</sub>), VOC limit of 30 ppm and CO limit of 250 ppm). This ratio is then converted to percent with the proposed engine limit set at 100%. This ratio can be generated by converting all emission limits to parts per million at 15% O<sub>2</sub> (the reference level for the Rule 1110.2 emission limits) or by converting all emission limits to pounds per million Btu.

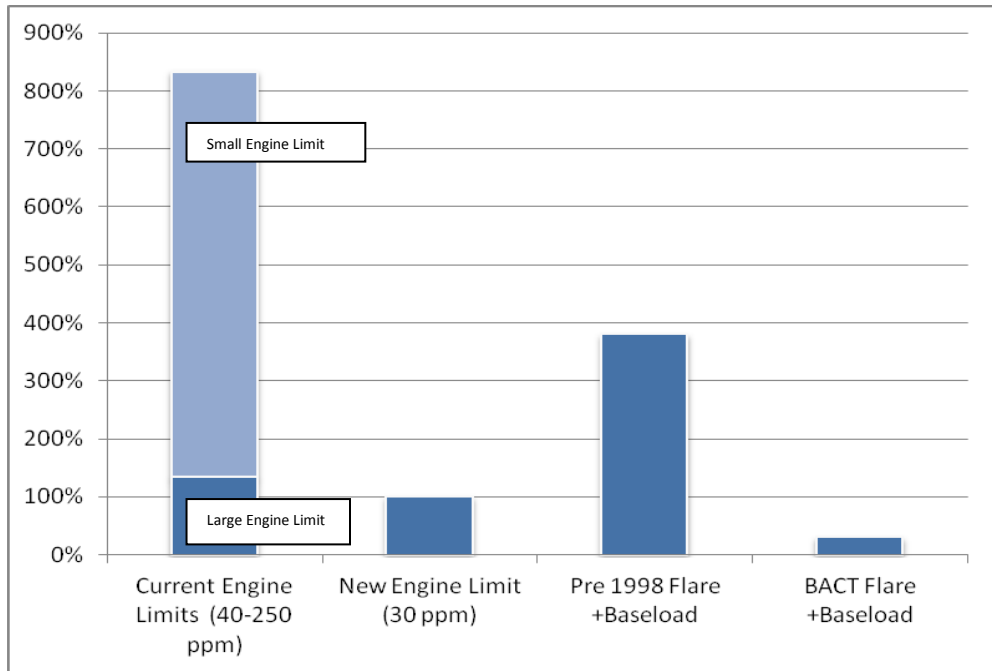
The emission comparisons assume that the biogas is diverted to flares from engines and there is an equivalent amount of electricity produced by local power plants meeting current BACT. Compared to flares, power plant criteria pollutant emissions are smaller because limits are very low and base load power plants use one-half of the fuel of engines to produce the same amount of electricity. These emissions are included in Figures 11 to 13 as part of the flare emissions. While there are other sources of electricity outside the AQMD, the amount of electricity produced by biogas engines is small in comparison and local base load power plants have enough capacity to replace these sources at a cost-effective price.

As presented in the Figures 11 through 13, the option to flare emissions would generate less criteria pollutant emissions than are currently produced under the existing emissions limits, regardless of flare configuration. Operating the IC engines at the proposed limits would be cleaner for NO<sub>x</sub> and VOC than venting emissions to the Pre-1998 flares (which include the required base load emissions). In each case, flaring using a BACT flare, including the base load emissions would generate fewer emissions than for IC engines operating within the proposed new emissions limits. However, the option to flare raises illuminates the counterpoint argument: Does flaring result in a greater GHG emissions impact than generating internal power?



**Figure 11**

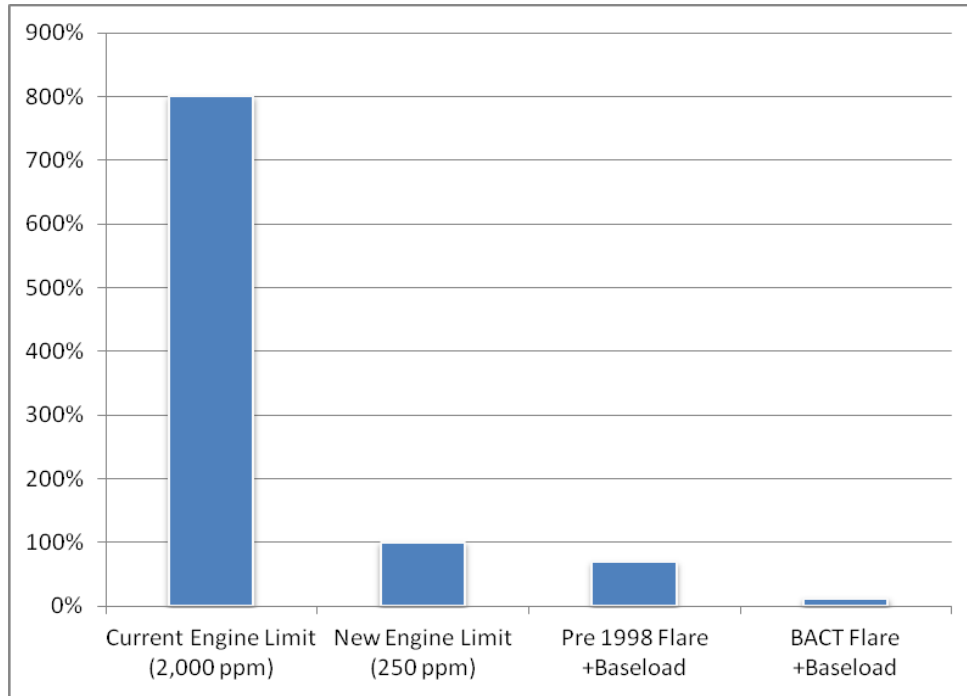
**Biogas Flare and Engine NOx Emissions Compared to an 11 PPM Emissions Limit**



**Figure 12**

**Biogas Flare and Engine VOC Emissions Compared to a 30 PPM Emissions Limit**





**Figure 13**

**Biogas Flare and Engine CO Emissions Compared to a 250 PPM Emissions Limit**

**Greenhouse Gas Impacts**

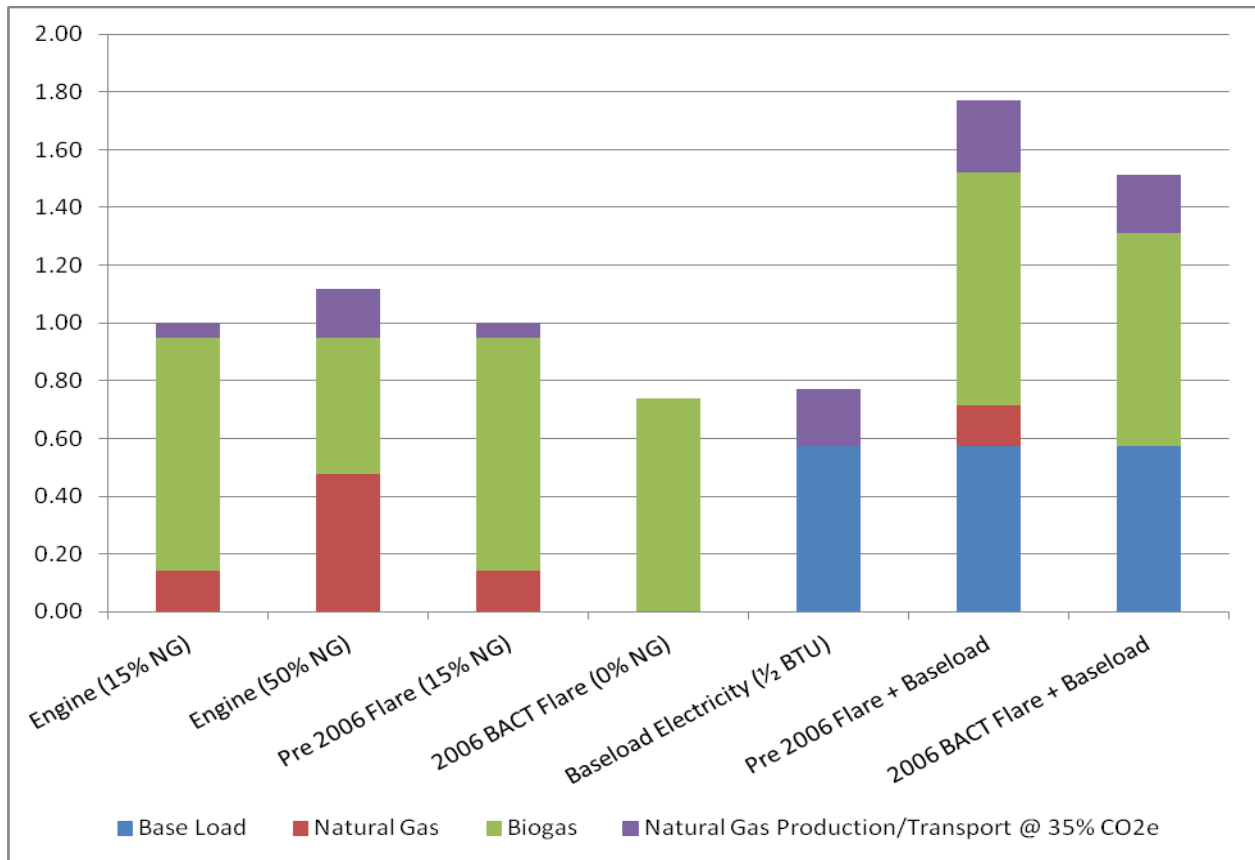
Figure 14 provides a comparison of greenhouse gas emissions impact from engines, flares and base load power generation. The figure includes emissions from engines using different amounts of supplemental fuel (natural gas), power plants and newer versus older flare technologies. The differences in GHG emissions are expressed as percent compared to biogas engine emissions. The GHG emission comparison in Figure 14 is based on carbon dioxide equivalents (CO<sub>2</sub>e). Emissions of gases that contribute to global warming are represented as CO<sub>2</sub> equivalents by taking into account their warming potential in the atmosphere relative to CO<sub>2</sub>. For example, methane (CH<sub>4</sub>) is assigned a warming potential of 21 times CO<sub>2</sub> (over a 100 year timeframe).

More specifically, the comparison of GHG emissions is also a ratio of each technologies emissions (expressed as carbon dioxide equivalents – CO<sub>2</sub>e) to the CO<sub>2</sub>e associated with an IC engine using 15% supplemental natural gas. This ratio is developed on a mass basis. In the case of an IC engine and pre-2006 flare, it is assumed that for every 100 methane molecules provided as fuel to the engine, 99 are combusted to CO<sub>2</sub> and one is emitted in the exhaust. The global warming potential of this one methane molecule is

equivalent to 21 CO<sub>2</sub> molecules. In addition, 15% of the fuel methane for the base engine and pre-2006 flare scenarios comes from natural gas. The 2010 U.S. EPA method for estimating the CO<sub>2</sub>e GHG emissions related from natural gas production and transport to an average of about 20% of the fuel Btu delivered to an operation. In 2011, EPA revised its estimate upwards to average of about 35% of the fuel Btu delivered. Using the 2011 U.S. EPA percentage translates to an additional CO<sub>2</sub>e of 6 more molecules of CO<sub>2</sub> due to production and transport of that natural gas. The summation of these emissions in terms of CO<sub>2</sub> equivalence results in an impact of 126 CO<sub>2</sub> molecules for every 100 molecules of methane provided to the engine.

The same methodology is used to generate the CO<sub>2</sub>e emissions from an engine using 50% supplemental natural gas with the same Btu content, a flare meeting current BACT limits and a base load power plant generating the same amount of electricity as the IC engine (using ½ the Btu of an engine). A flare meeting 2006 BACT has more complete combustion and emits half of the methane than older flares emit and does not require supplemental natural gas. These “emissions” are then used to generate a ratio with the base engine represented as 100%. In this analysis, the electricity is produced by local power plants in order to determine the worst case emissions if engines are replaced with flares.

As depicted in Figure 14, operation of the IC engine using a 15 percent natural gas and 85 percent biogas is equivalent to 126 CO<sub>2</sub> molecules or a factor of 1.0 on the chart. An engine burning 50 percent natural gas has a higher ratio because of the additional production and transport contribution to the total CO<sub>2</sub>e. Using a Pre 2006 (non-BACT) flare with the 15 percent natural gas contribution has an equivalent CO<sub>2</sub>e signature as the biogas engine (1.0). The BACT flare and base load power generation (with the production and transport contribution to the total CO<sub>2</sub>e) exhibit lower GHG impacts compared to the biogas engine or the Pre 2006 flare. However, if a facility elects to flare the gas with a Pre 2006 flare but acquires power from the grid, the factor approaches 1.8 or 80 percent more GHG emissions than continued operation of the IC engine. Even if a facility uses a BACT flare but needs supplemental power from the grid, the factor rises to approximately 1.5 or 50 percent GHG emissions above the continued operation of the IC engine.



**Figure 14**

**Comparison of CO<sub>2</sub> Equivalent Greenhouse Emissions from Flares and Base Load Electricity and IC Engines**

**GHG Impact Summary**

The above analysis provides background assessments of the trade-off between achieving lower criteria pollutant emissions levels from complying with the proposed new standards and the possible GHG emissions penalty which may be incurred if a facility flares but is required to purchase power from the grid. Compared to current biogas engines, flares typically have lower criteria pollutant emissions profiles but have higher emissions of greenhouse gases because electricity must be generated by other sources if the biogas is not used in an engine generating electricity (Table 14).

**Table 14. Comparison of Criteria Pollutant and GHG Impacts from ICE Operating and from Flaring**

Pollutant	Magnitude of Flaring w/BACT Flare + Baseload Compared to ICEs
NOx	5 to 7x Less
CO	67x Less
VOC	4 to 273x Less
GHG (CO <sub>2</sub> e)	1.4x More

Flares meeting current BACT also have a significantly lower greenhouse gas impact compared to older flares. However, new BACT flares still result in about 50% more greenhouse gas emissions than current engines (on a CO<sub>2</sub>e basis).

In general, criteria pollutant impacts have an immediate impact on public health and as such are typically given greatest weight. GHG gas goals set by AB32 and companion legislation target the long term control strategy to address global warming. Both issues have merit and deserve attention. One additional element that needs to be noted is energy conservation and the potential wasting of an available energy source (biogas) which is neither drilled nor mined.

## CONCLUSION

The technology demonstration projects have shown that technology is available that can achieve significant reductions in NOx, VOC, and CO. Since the 2008 amendment of Rule 1110.2, oxidation catalyst and SCR technology has been effective in reducing pollutant emissions cost effectively for natural gas engines. At the time of the Interim Technology Assessment of 2010, this technology was in the early stages of being explored for the control of biogas engines as well. Since then, the demonstration project at OCSD was successfully completed for the control of biogas emissions from a digester gas facility. In addition, a sufficient amount of data over almost three years was obtained from Ox Mountain Landfill, demonstrating that the control of emissions from a landfill gas-fired engine is achievable on a consistent basis. The utilization of biogas cleanup with siloxane removal has proven essential for the protection of engine components and catalysts. Biogas cleanup systems are currently in use for the protection of engines as

well as microturbines and turbines in the District today. These same systems can also clean the biogas effectively to protect the post-combustion catalytic controls as well.

In addition to catalyst technology, other technologies have emerged as viable alternatives such as the NOxTech system and Hydrogen Injection. Furthermore, technologies such as fuel cells and Flex Energy are viable alternatives for the replacement of IC Engine generated power altogether. The proposed compliance schedule is reasonable, and will allow facilities the needed time to procure, design, and install these systems. Additionally, the compliance schedule will allow enough time for other technologies to be demonstrated and will give facilities more options for compliance.

Alternatives also exist for those facilities, especially landfills, that have closed and whose biogas supply is decreasing below the usable level for IC Engines. In this case, the other alternatives that may be used are boilers, microturbines, or Flex Energy. It is ultimately an operator's decision to flare the biogas, as this also remains as an alternative. However, flaring is still viewed as undesirable due to the pollutant impacts and trade-offs. Cost effective technologies exist that can preclude flaring and still maintain a facility's power-generating capacity with the remaining amount of landfill gas.

The cost effectiveness analysis based on actual data for a digester gas facility shows that the technology is scalable and cost effective for digester gas engines of all sizes. From a dollars per kilowatt standpoint, the analysis shows that the cost of power production will not exceed the cost of purchasing the same power from the grid.

The proposed limits of Rule 1110.2 are feasible and cost effective. Technologies exist today that can achieve these emission limits within the compliance schedule in the Staff proposal. Given the aforementioned cost effective controls and reasonable compliance schedule, increased flaring is not anticipated to occur. On this basis, Staff recommends to move forward with Proposed Amended Rule 1110.2 while maintaining a commitment to continue working with the regulated community in monitoring the performance of on-going demonstration projects to assure that the compliance schedule is reasonable.

**ATTACHMENT A**

**COST EFFECTIVENESS CALCULATIONS FOR RULE 1110.2  
REQUIREMENTS FOR BIOGAS ENGINES**

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**Gas Cleanup System + Oxidation Catalyst + SCR (20-year Equipment Life) – Cost basis is OCSD pilot study demonstration**

BHP	Digester 4200	Digester 3471	Digester 1600	Digester 1000	Digester 500	Digester 250	Landfill 4200	Landfill 3471	Landfill 2700	Landfill 2000	Landfill 1500
Installed Equipment, \$ (Note 1)	2,240,791	1,989,529	1,230,965	921,665	602,807	395,072	2,345,061	2,082,529	1,781,763	1,479,753	1,239,133
<i>Equipment minus Catalyst, \$</i>	2,102,364	1,875,129	1,178,231	888,707	586,328	386,832	2,206,634	1,968,129	1,692,774	1,413,835	1,189,695
<i>Added Cleanup w/20% contingency</i> <i>(Note 2)</i>	420,473	375,026	235,646	177,741	117,266	77,366	441,327	393,626	338,555	282,767	237,939
<i>Catalyst Cost, \$ (Note 3)</i>	138,427	114,400	52,734	32,959	16,479	8,240	138,427	114,400	88,989	65,918	49,438
<b>Installed Equipment w/20% contingency, \$</b>	<b>2,661,264</b>	<b>2,364,555</b>	<b>1,466,611</b>	<b>1,099,407</b>	<b>720,073</b>	<b>472,438</b>	<b>2,786,388</b>	<b>2,476,155</b>	<b>2,120,318</b>	<b>1,762,520</b>	<b>1,477,072</b>
Project Management & Installation Supervision, \$ (Note 4)	361,107	298,429	137,565	85,978	42,989	21,494	361,107	298,429	232,140	171,956	128,967
<b>Total Initial Investment, \$</b>	<b>3,022,371</b>	<b>2,662,984</b>	<b>1,604,176</b>	<b>1,185,384</b>	<b>763,062</b>	<b>493,933</b>	<b>3,147,495</b>	<b>2,774,584</b>	<b>2,352,458</b>	<b>1,934,475</b>	<b>1,606,039</b>
Sorbent Replacement, \$/yr (Note 5)	165,600	138,000	69,000	103,500	51,570	12,420	276,000	276,000	138,000	207,000	103,500
Catalyst Replacement, \$/yr (every 2yr, Note 6)	69,213	57,200	26,367	16,479	8,240	4,120	69,213	57,200	44,494	32,959	24,719
Reactant, \$/yr (Note 7)	22,869	18,900	8,712	5,445	2,723	1,361	22,869	18,900	14,702	10,890	8,168
Reduced Power Production, \$/yr (Note 8)	2,859	1,200	1,089	681	340	170	1,664	1,200	1,069	792	594
Equipment Maintenance, \$/yr (Note 9)	-36,479	-30,147	-13,897	-8,685	-4,343	-2,171	-36,479	-30,147	-23,451	-17,371	-13,028
<b>Total Annual Cost, \$</b>	<b>224,064</b>	<b>185,153</b>	<b>91,272</b>	<b>117,420</b>	<b>58,530</b>	<b>15,900</b>	<b>333,268</b>	<b>323,153</b>	<b>174,815</b>	<b>234,270</b>	<b>123,953</b>
<b>Present Value of 20-yr Cost, \$ (Note 10)</b>	<b>6,067,395</b>	<b>5,179,213</b>	<b>2,844,560</b>	<b>2,781,121</b>	<b>1,558,484</b>	<b>710,013</b>	<b>7,676,607</b>	<b>7,166,233</b>	<b>4,728,196</b>	<b>5,118,211</b>	<b>3,290,558</b>
NOx Reduction, tpy (Note 11)	12.6	10.5	4.8	3	1.5	1	12.6	10.5	8.1	6	4.5
VOC Reduction, tpy (Note 11)	29	24	11.1	6.9	3.5	1.7	1.3	1.1	0.8	0.6	0.5
CO Reduction, tpy (Note 11)	538.9	445.4	205.3	128.3	64.2	32.1	538.9	445.4	346.4	256.6	192.5
CO Reduction/7, tpy (Note 12)	77.0	63.6	29.3	18.3	9.2	4.6	77.0	63.6	49.5	36.7	27.5
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7</b>	<b>2600</b>	<b>2600</b>	<b>3100</b>	<b>4900</b>	<b>5500</b>	<b>4900</b>	<b>4200</b>	<b>4800</b>	<b>4000</b>	<b>5900</b>	<b>5100</b>
<b>\$/kW-hr</b>	<b>0.012</b>	<b>0.013</b>	<b>0.015</b>	<b>0.024</b>	<b>0.027</b>	<b>0.025</b>	<b>0.016</b>	<b>0.018</b>	<b>0.015</b>	<b>0.022</b>	<b>0.019</b>

**Notes for Gas Cleanup + Oxidation Catalyst + SCR:**

1	From the OCSD Final Report for a 3,471 bhp engine, the construction subtotal for equipment and labor with contractor contingencies included is \$1,989,529.
	The non-catalyst installed cost is assumed to vary with $bhp^{0.6}$ based on general chemical engineering cost estimating practice for tanks and reactors.
	For landfills, the installed cost of the siloxane removal system is higher because of the higher gas volume per BTU supplied to the engine. Additional cost for gas cleanup on a 3,471 bhp engine is \$93,000.
2	A 20% contingency to account for possible additional gas cleanup equipment is added to the equipment costs minus catalyst
3	For the OCSD catalysts, there were 16 catalytic oxidizer blocks at \$3,450 per block and thirty-two SCR catalyst blocks at \$1,850 per block.
	Catalyst cost is assumed to vary directly with bhp.
4	Cost for project management and installation supervision for OCSD was calculated as a 15% contingency of the installed equipment costs, not including the 20% contingency accounting for possible additional gas cleanup equipment.
5	Vender quotes were obtained for non-regenerative activated carbon vessels/media and were sized and bracketed according to flow rate. Change-out frequency is once every month. The total cost for the media replacement was divided by the number of engines per facility to arrive at a per engine cost. The highest cost at each bracketed engine size was used.
	OCSD's media replacement cost from the pilot study was \$40,000 for one year on a 3,471 engine.
6	OCSD experienced a partial deactivation of its oxidation catalyst after two years of operation. Staff has accounted for this by using the annual cost for a biannual catalyst replacement.
7	Cost of urea is based on OCSD's annual cost. Reactant cost is assumed to vary directly with horsepower.
8	Pressure drops across the siloxane removal and SCR systems are assumed to be 3" H2O each. Calculated reduction in power production is 0.147%.
	Cost of reduced power is: $bhp \times 0.00147 \times 8,000 \text{ hrs/yr} \times 0.746 \text{ kW/bhp} \times 0.97 \text{ generator efficiency (kWh/yr)}$
	For landfill gas the power reduction is 0.161% because the higher volume of landfill gas per BTU supplied to the engine. Cost of power is \$0.08/kWh for digester gas (cost of grid power) and \$0.0425/kWh for landfill gas power (typical wholesale price based on price SCE paid for power from El Sobrante landfill [2002 contract]).
	Electrical costs for OCSD's pilot study were \$1,200/yr.
9	OCSD's reduced engine maintenance was subtracted from its equipment maintenance for the pilot study. This cost is assumed to vary directly with horsepower.
10	The present worth value (PWV) is calculated for a project life of 20 years at an interest rate of 4%.
11	Baseline NOx is 36 ppmvd corrected to 15% O2 for engines equal to or greater than 500 bhp and 45 ppmvd corrected to 15% O2 for engines smaller than 500 bhp.
	Baseline VOC is 40 ppmvd corrected to 15% O2 for landfill gas engines and 250 ppmvd corrected to 15% O2 for digester gas engines.
	Baseline CO is 2000 ppmvd corrected to 15% O2.
	Conversion of ppmvd corrected to 15% O2 to g/bhp-hr was based on an engine efficiency of 33% (based on higher heating value), which was the average for biogas engines in the engine survey conducted for the 2008 amendment. This includes a correction of 3% greater volume of combustion products (corrected to 15% O2) due to the CO2 in the fuel.
	The emission reduction calculations assume 8,000 hrs/yr of engine operation.
12	The CO reductions are discounted by 1/7 due to its reduced ozone formation potential.



## NOxTech System (20-year Equipment Life) – Costs provided by NOxTech

	Digester	Digester	Digester	Digester	Digester	Digester	Digester	Landfill	Landfill	Landfill	Landfill	Landfill	Landfill
BHP	4200	3471	1600	1350	1000	500	250	4200	3471	2700	2000	1500	1350
<b>Installed Equipment, \$</b>													
<i>Equipment Cost, \$ (Note 1)</i>	960,000	800,000	400,000	400,000	400,000	400,000	400,000	960,000	800,000	800,000	400,000	400,000	400,000
<i>Installation Cost, \$ (Note 2)</i>	250,000	200,000	100,000	100,000	100,000	100,000	100,000	250,000	200,000	200,000	100,000	100,000	100,000
<i>Installation Cost Contingency, \$ (Note 3)</i>	300,000	300,000	300,000	300,000	300,000	300,000	300,000	0	0	0	0	0	0
Project Management & Installation Supervision, \$ (Note 4)	31,742	26,452	13,226	13,226	13,226	13,226	13,226	31,742	26,452	26,452	13,226	13,226	13,226
<b>Total Initial Investment, \$</b>	<b>1,541,742</b>	<b>1,326,452</b>	<b>813,226</b>	<b>813,226</b>	<b>813,226</b>	<b>813,226</b>	<b>813,226</b>	<b>1,241,742</b>	<b>1,026,452</b>	<b>1,026,452</b>	<b>513,226</b>	<b>513,226</b>	<b>513,226</b>
Reactant, \$/yr (Note 5)	37,952	31,365	14,458	12,199	9,036	4,518	2,259	37,952	31,365	24,398	18,073	13,554	12,199
Reduced Power Production, \$/yr (Note 6)	68,365	56,499	26,044	21,975	16,277	8,139	4,069	53,041	43,834	34,098	25,258	18,943	17,049
Equipment Maintenance, \$/yr (Note 7)	16,000	16,000	8,100	8,100	8,100	8,100	8,100	16,000	16,000	16,000	8,100	8,100	8,100
<b>Total Annual Cost, \$</b>	<b>122,318</b>	<b>103,864</b>	<b>48,602</b>	<b>42,274</b>	<b>33,414</b>	<b>20,757</b>	<b>14,428</b>	<b>106,993</b>	<b>91,199</b>	<b>74,496</b>	<b>51,430</b>	<b>40,598</b>	<b>37,348</b>
<b>Present Value of 20-yr Cost, \$ (Note 8)</b>	<b>3,204,042</b>	<b>2,737,965</b>	<b>1,473,728</b>	<b>1,387,724</b>	<b>1,267,319</b>	<b>1,095,312</b>	<b>1,009,308</b>	<b>2,695,780</b>	<b>2,265,852</b>	<b>2,038,847</b>	<b>1,212,161</b>	<b>1,064,947</b>	<b>1,020,783</b>
NOx Reduction, tpy (Note 9)	12.6	10.5	4.8	4.1	3	1.5	1	12.6	10.5	8.1	6	4.5	4.1
VOC Reduction, tpy (Note 9)	29	24	11.1	9.3	6.9	3.5	1.7	1.3	1.1	0.8	0.6	0.5	0.4
CO Reduction, tpy (Note 9)	538.9	445.4	205.3	173.2	128.3	64.2	32.1	538.9	445.4	346.4	256.6	192.5	173.2
CO Reduction/7, tpy (Note 10)	77.0	63.6	29.3	24.7	18.3	9.2	4.6	77.0	63.6	49.5	36.7	27.5	24.7
<b>Cost Effectiveness, \$ per ton of NOx+VOC+CO/7</b>	<b>1400</b>	<b>1400</b>	<b>1600</b>	<b>1800</b>	<b>2200</b>	<b>3900</b>	<b>6900</b>	<b>1500</b>	<b>1500</b>	<b>1700</b>	<b>1400</b>	<b>1600</b>	<b>1700</b>
<b>\$/kW-hr</b>	<b>0.007</b>	<b>0.007</b>	<b>0.008</b>	<b>0.009</b>	<b>0.011</b>	<b>0.019</b>	<b>0.035</b>	<b>0.006</b>	<b>0.006</b>	<b>0.007</b>	<b>0.005</b>	<b>0.006</b>	<b>0.007</b>

**Notes for NOxTech System:**

1	NOxTech provided the following cost information:
	Equipment cost for NOxTech unit sized for 1 engine at 1.5 MW max rating = \$400,000. 2 units are required for engines greater than 1.5 MW and less than 3 MW = \$800,000. A discount is offered for 3 or more units purchased simultaneously = \$960,000 for engines greater than 3 MW.
	If a single unit treats multiple engines with a maximum total rating of 1.5 MW, the cost is \$450,000.
	These installation costs are “turn-key.” They are site-specific and depend on many factors. The installation costs provided by NOxTech are intended to be typical.
2	Installation costs, including urea tank, are \$100,000 for 1 unit treating 1 engine up to 1.5 MW, \$200,000 for 2 units treating engines greater than 1.5 MW and less than 3 MW, and \$250,000 for 3 units treating engines greater than 3 MW.
	For a single unit treating multiple engines with a maximum total rating of 1.5 MW, the cost is \$150,000.
3	EMWD’s installation costs were \$400,000 for the EGR system. There were also additional equipment and design costs reported that may be site-specific, depending on operating characteristics. The added engineering costs are not independently verifiable. As part of the demonstration project, EMWD incurred added design costs that are not anticipated to be included as a part of future off-the-shelf technology. The additional costs are presented here merely as a worst case and are not expected to be incurred by future end users. The added EGR costs do not apply to landfills because there is no expected natural gas supplementation that would necessitate an EGR system.
4	Project management and installation supervision is assumed to be the same ratio to non-catalyst installed equipment as the OCSD project. For the Interim Technology Assessment, this cost was estimated to be \$36,000 for OCSD labor for project management and installation supervision of \$1,096,000 of non-catalyst equipment cost. For OCSD’s actual non-catalyst equipment cost, which was \$1,875,129, the project management and installation supervision cost is approximately \$62,000.
5	Reactant is urea. Stoichiometry is 1 pound of urea to treat 1 pound of NOx. Cost of urea is \$1.50 per gallon based on information provided by NOxTech. Reactant cost is assumed to vary directly with horsepower.
6	Reduction in power production is caused by biogas use in NOxTech reactor and pressure drop across NOxTech system. Fuel use is assumed to be 5% of full-load engine fuel, and pressure drop is assumed to be 3”H2O. Calculated reduction in power production is 0.133%.
	Reduced power output is: $\text{bhp} \times 0.746 \text{ kW/bhp} \times 8,000 \text{ hrs/yr} \times 0.00133 \times 0.97 \text{ generator efficiency (kWh/yr)}$ .
	It is assumed that use of 5% of full-load engine fuel in NOxTech chamber further reduces power by 5% in landfill gas case, but digester gas can be replaced by natural gas.
	Cost of reduced power is \$0.08/kWh for digester gas case and \$0.0425/kWh for landfill gas case. Cost of natural gas is \$0.50 per them.
7	Information provided by NOxTech: annual maintenance for 1 NOxTech unit is estimated to be \$8,100 and \$16,000 for 2 or more units. The annual maintenance cost for 1 unit treating multiple engines with a maximum total rating of 1.5 MW is \$10,000.
8	Same as Note 10 in previous table.
9	Same as Note 11 in previous table.
10	Same as Note 12 in previous table.

**ATTACHMENT B**

**ORANGE COUNTY SANITATION DISTRICT CATALYTIC  
OXIDIZER/SCR PILOT STUDY FINAL REPORT, JULY 2011**

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## Orange County Sanitation District

10844 Ellis Avenue • Fountain Valley CA 92708-7018

# Retrofit Digester Gas Engine with Fuel Gas Clean-up and Exhaust Emission Control Technology

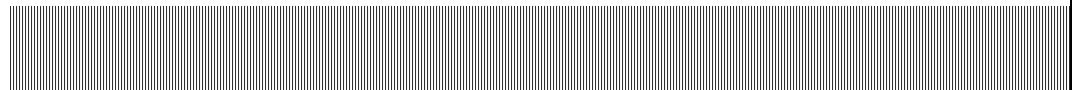
South Coast Air Quality Management District Contract #10114

## Pilot Testing of Emission Control System Plant 1 Engine 1

Orange County Sanitation District Project No. J-79

FINAL REPORT

July 2011



Report Prepared By:

**Malcolm Pirnie, The Water Division of ARCADIS**

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*The Water Division of ARCADIS*

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## Glossary of Terms

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<b><u>Acronym</u></b>	<b><u>Definition</u></b>
ARB	Air Resources Board
AQMD	Air Quality Management District
BACT	Best Available Control Technology
bhp	Brake horse power
CEMS	Continuous emissions monitoring systems
CI	Compression Ignition
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
Cpsi	Cells per square inch
°C	Degrees Centigrade
°F	Degrees Fahrenheit
DG	Digester Gas
DGCS	Digester Gas Cleaning System
EPA	Environmental Protection Agency
FTIR	Fourier Transform Infrared
GC/MS	Gas chromatography-mass spectrometry
H <sub>2</sub> S	Hydrogen sulfide
HHV	Higher Heating Value
HI	Hazard Index
hp	Horse power
HRU	Heat Recovery Unit
IC	Internal Combustion
in. w.c.	Inches water column
KW	Kilowatt
MDL	Method Detection Limit
MMscf	Million standard cubic feet
MW	Megawatts
N <sub>2</sub>	Nitrogen
NG	Natural Gas
NMHC	Non-methane hydrocarbons
NMNEOC	Non-methane non-ethane organic compounds
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	Nitrogen oxides
O <sub>2</sub>	Oxygen
OCSD	Orange County Sanitation District
PEMS	Parametric Emission Monitoring System
PM	Particulate matter
ppbv	Parts per billion by volume
ppm	Parts per million
ppmv	Parts per million by volume
psig	Pounds per square inch gage
RPM, rpm	Revolutions per minute
SCAQMD	South Coast Air Quality Management District
SCAT	Synthetic gas matrix catalyst activity test
scfm	Standard cubic feet per minute



<b><u>Acronym</u></b>	<b><u>Definition</u></b>
SI	Spark-ignited
VOCs	Volatile organic compounds
XRF	X-ray fluorescence

## Acknowledgements

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This pilot study could not have been accomplished without the support and cooperation of the following people (listed in alphabetical order), as well as numerous others who contributed to the performance of the project.

### South Coast Air Quality Management District

- Alfonso Baez
- Howard Lange
- Laki Tisopulos
- Charles Tupac

### Orange County Sanitation District

- Randa AbuShaban
- Terry Ahn
- Kim Christensen
- James Colston
- David Halverson
- James Herberg
- Vladimir Kogan
- David MacDonald
- Lisa Rothbart
- Nguyen Thomas
- Edward Torres
- Don Van Voorst
- Trimbak Vohra

### Malcolm Pirnie, Inc.

- Phyllis Diosey
- Joseph Krupa
- Kit Liang
- Dennis Papastathis
- Sarina Sriboonlue
- Daniel Stepner

# Executive Summary

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The Orange County Sanitation District (OCSD) owns and operates two wastewater treatment plants in Orange County, California, Reclamation Plant No. 1 (Plant 1) in Fountain Valley and Treatment Plant No. 2 (Plant 2) in Huntington Beach. Each plant operates a Central Power Generation System (CGS) to produce electrical power for the plant operations using large digester gas-fired internal combustion (IC) engines. Plant 1 has three (3) 2.5-megawatt (MW) internal combustion (IC) engines and Plant 2 has five (5) 3-MW IC engines, fueled primarily by digester gas (a biogas) and supplemented by small amounts of natural gas.

Plants 1 and 2 are within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD has established regulations aimed at reducing and controlling air emissions from combustion sources, such as the engines at the plant CGS, including Rule 1110.2 *Emissions from Gaseous and Liquid-fueled Internal Combustion Engines*. In February 2008, SCAQMD amended Rule 1110.2, lowering the emission limits for nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOCs), and carbon monoxide (CO) for IC engines. The amended rule also requires biogas-fueled engines to meet new lower NO<sub>x</sub>, CO, and VOC emission limits effective July 2012.

In April 2008, OCSD engaged Malcolm Pirnie to conduct an emission reduction technology evaluation of the CGS engines in order to identify technologies for reducing NO<sub>x</sub>, CO, and VOC emissions to meet the new Rule 1110.2 emission limits, including combustion modification and post-combustion control. After a detailed review of different technologies, the post-combustion technology of catalytic oxidizer/selective catalytic reduction (Cat Ox/SCR) system with digester gas cleaning system (DGCS) using carbon adsorption was recommended as the technology with the most potential for meeting the future Rule 1110.2 emission limits. OCSD then embarked on a full-scale pilot study of the recommended technology on Engine 1 at Plant 1 to evaluate if the future amended Rule 1110.2 limits can be met for their digester gas-fired IC engines. Because SCAQMD recognized that the future emission limits in amended Rule 1110.2 were “technology-forcing,” the Governing Board directed staff to conduct a technology assessment to determine if cost-effective and commercially available technologies exist that can achieve these new lower emission limits. SCAQMD issued a grant to OCSD in 2009 (*SCAQMD Contract #10114*) to support the pilot test study at Plant 1 Engine 1, and the operation of the pilot study was granted a Permit to Construct/Operate for an Experimental Research Project by SCAQMD (Application Number 497717) in November 2009. The construction and installation of the pilot study equipment commenced in October 2009; the pilot study testing officially began on April 1, 2010 and officially ended on March 31, 2011.

Under the pilot study, Engine 1 at Plant 1 was equipped with a catalytic oxidizer to remove CO and VOCs, followed by an SCR system with urea injection to remove NOx (both systems supplied by Johnson Matthey). Due to space limitations at Plant 1, the catalytic oxidizer and SCR systems were mounted on a platform 14 feet above an onsite access road. Engine 1 is fueled primarily by digester gas, supplemented by natural gas. Digester gas contains low concentrations of siloxanes and other compounds which convert to sand-like particulate during combustion (silica) that contribute to rapid degradation of engines, gas turbines, and boilers, along with increased maintenance requirements. In addition, the silica also adheres to the catalyst media of the post-combustion control equipment. Therefore, a digester gas cleaning system (DGCS) was installed (supplied by Applied Filter Technology) to remove these contaminants from the digester gas before it was combusted in Engine 1. The potential for carbon media breakthrough was routinely monitored for using Draeger® tubes to measure hydrogen sulfide (H<sub>2</sub>S) concentrations. Samples of the digester gas before and after the DGCS were also sent for laboratory analysis to measure for siloxane, H<sub>2</sub>S, and VOCs that could indicate media breakthrough. During the study, inlet and outlet concentrations of CO, NOx, and VOCs were measured to determine the potential reductions in emissions due to the Cat Ox/SCR system. Sampling methods included:

- CO: Portable analyzer, SCAQMD Method 100.1
- VOCs: SCAQMD Methods 25.1/25.3
- NOx: Portable analyzer, SCAQMD Method 100.1
- Aldehydes: Modified CARB Method 430, SCAQMD Method 323 (formaldehyde)
- Ammonia slip (free ammonia): Modified SCAQMD Method 207.1 and Draeger® tubes

In addition, data from the OCSD's continuous emissions monitoring system (CEMS) was collected at the engine exhaust (inlet to the Cat Ox system) for NOx and at the stack exhaust for NOx, CO, and O<sub>2</sub>. All CEMS data is based on 15-minute averages. Sampling was also performed for formaldehyde, acetaldehyde, and acrolein as required by the Experimental Research Project permit. In addition, ammonia levels in the stack exhaust were also measured to quantify potential ammonia slip, a result of the urea injection used in the SCR system. The overall conclusions of the pilot study are as follows:

1. The average NOx concentration at the stack exhaust after the pilot study controls was approximately 7 ppmv, below the 11 ppmv required under amended Rule 1110.2. The lowest NOx stack exhaust concentration met consistently under all valid conditions was 16 ppmv. While there were some periods (i.e., 15-minute block averages) where the NOx stack exhaust concentration was above 11 ppmv, after screening these periods, 181 periods out of 21,285 total operating periods (approximately 5,321 hours) remained as valid NOx excursions above the new Rule

1110.2 limit. These periods occurred during 61 separate events and accounted for less than 0.9% of the total measurement periods during the pilot study. Excursions were considered valid when they occurred during periods/events when the percentage of natural gas increased to above 5% of the fuel blend, when engine loads exceeded the loads mapped during the SCR system commissioning, or during periods/events not attributable to engine start-up or operational /system adjustments. An implication of these remaining periods are that the 11 ppmv limit is too conservative an emission limit, and may warrant further evaluation and potential increase and/or a specified percentage of allowable excursions.

2. SCR systems similar to the Johnson Matthey® system used in the present pilot study are commercially available for combustion units fueled by single component fuels, such as natural gas. Although the SCR system did not consistently meet the 11 ppmv limit with the digester gas/natural gas fuel blend in the pilot study, it did demonstrate a significant reduction in NOx emissions.
3. The free ammonia concentration was below 0.5 ppmv during all testing events using either SCAQMD compliance method 207.1, and below the Method Detection Limit (MDL) using Draeger® tubes.
4. The maximum CO concentration at the stack exhaust using the CEMS data was 42.2 ppmv, well below the amended Rule 1110.2 emission limit of 250 ppmv.
5. The maximum VOC concentration at the stack exhaust was found to be 4.95 ppmv, and was consistently well below the 30 ppmv limit in amended Rule 1110.2.
6. The use of the combined Cat Ox/SCR system in the pilot study resulted in significant reductions in CO, VOC, and NOx.
7. The DGCS system, in general, removed siloxanes from the digester gas to below Method Detection Limit (MDL) levels and significantly reduced sulfur compounds and VOCs successfully reducing catalyst masking which should lead to extended catalyst life. Additional benefits of the contaminant removal were significant improvements in engine maintenance requirements and lower O&M costs.
8. The total capitals cost to design, procure, and install a digester gas cleaning vessel to clean all the digester gas to the three Plant 1 engines, and a Cat Ox/SCR system with auxiliary equipment for Engine 1 is estimated to be \$2,300,000. The annual operations and maintenance (O&M) cost for these systems at Plant 1 is approximately \$59,000. Assuming a 20-year lifespan, the total annualized cost (capital cost plus O&M) for the DGCS and Cat Ox/SCR systems for Plant 1 Engine 1 is \$227,000.
9. The cost effectiveness analysis (based on dollars per ton of NOx, VOC, and CO emissions reduced) was developed for two scenarios: Scenario 1 assumed that the uncontrolled emissions were developed based on current permit limits (i.e., 45 ppmv, 209 ppmv, and 2,000 ppmv, respectively), and Scenario 2 assumed that the uncontrolled emissions were developed based on the results from the 2011 Annual Compliance Test for Engines 2 and 3. Both scenarios assumed that the controlled emissions were based on the Rule 1110.2 limits of 11 ppmv for NOx and 30 ppmv

for VOCs, and the pilot testing results of 15 ppmv for CO. Under these assumptions, the cost effectiveness for Scenarios 1 and 2 is \$7,987 and \$17,585, respectively, per ton of NOx plus VOCs reduced. The cost effectiveness for Scenarios 1 and 2 is \$636 and \$3,546, respectively, per ton of CO reduced. Note that the cost effectiveness for CO is conservative since the annualized cost is based on the entire system including the SCR and urea injection system. The annualized cost and emissions reduced calculations were based on operating each engine for a maximum of 6,000 hours per year.

# 1. Project Background and Objectives

---

## 1.1. Background

The Orange County Sanitation District (OCSD) owns and operates two (2) wastewater treatment plants that serve 21 cities and three special districts in the central and northwest Orange County, California, Reclamation Plant No. 1 (Plant 1) in Fountain Valley and Treatment Plant No. 2 (Plant 2) in Huntington Beach. In addition to the wastewater treatment processes, each plant operates a Central Power Generation System (CGS) to produce electrical power for the plant operations using large digester gas-fired internal combustion (IC) engines. Plant 1 has three (3) 2.5 megawatt (MW) internal combustion (IC) engines and Plant 2 has five (5) 3 MW IC engines, fueled primarily by digester gas (a biogas) and supplemented by small amounts of natural gas. Biogas, a by-product of the anaerobic digestion of wastewater solids, is classified as a renewable fuel, and the combustion of the biogas in the IC engines provides a beneficial reuse of a waste product.

Plants 1 and 2 are within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD has established regulations aimed at reducing and controlling air toxic emissions from combustion sources, such as the engines at the plant CGS, including Rules 1110.2, 1401 and 1402. Under Contract J-79 Air Toxics Emission Reduction Strategic Plan (2003), Malcolm Pirnie was retained by the OCSD to perform an evaluation of regulations addressing air toxic requirements under the rules. Malcolm Pirnie prepared an emission reduction study/air toxics strategic plan for the OCSD to comply with the NO<sub>x</sub> emission limit under Rule 1110.2 for IC engines. The study also addressed acceptable risk levels from Plant 1 and Plant 2 to comply with Rules 1401 and Rule 1402 (*Air Toxic Emission Reduction Strategic Plan* (Malcolm Pirnie, 2004) and *2012 Air Toxic Emission Reduction Strategic Plan* (Malcolm Pirnie, 2006)). The study identified the formaldehyde emissions from the CGS engines as a significant contributor to the overall risk levels, and also identified a catalytic oxidizer system with a digester gas cleaning system (DGCS) as a viable control technology to reduce the formaldehyde emissions from the digester gas-fired IC engines. This system was evaluated in a full-scale pilot study of a catalytic oxidizer system on Engine 3 at Plant 2 (*Catalytic Oxidizer Pilot Study* (Malcolm Pirnie, 2007)).

A catalytic oxidizer system is one of the most promising technologies for controlling carbon monoxide (CO) and volatile organic compounds (VOC) emissions from combustion units burning natural gas. However, fouling or rapid performance degradation of the catalytic oxidizers has been an issue for engines burning digester gas due to contaminants in the digester gas, such as volatile methyl-siloxanes and sulfurous compounds that tend to foul the catalytic oxidizers. Therefore, the use of a digester gas



cleaning system to prevent the contaminants in the digester gas from fouling and/or masking the catalyst was also evaluated.

In February 2008, SCAQMD further amended Rule 1110.2 to reduce emission limits for nitrogen oxides (NO<sub>x</sub>), VOCs, and CO, and also to improve/enhance monitoring, recordkeeping and reporting requirements for IC engines. Biogas engines were given until July 2012 to meet new lower emission limits. Malcolm Pirnie conducted an emission reduction technology evaluation of the CGS engines and identified several technologies for reducing NO<sub>x</sub>, CO, and VOC emissions, including combustion modification and post-combustion control (*Feasibility Study for a Technology Evaluation for Compliance with Amendments to SCAQMD Rule 1110.2 – Emissions from Gaseous and Liquid-fueled Internal Combustion Engines* (Malcolm Pirnie, 2008)). After a detailed review of the different technologies, the post-combustion technology of catalytic oxidizer/selective catalytic reduction (Cat Ox/SCR) system with DGCS using carbon adsorption was recommended as the technology with the most potential for meeting the future Rule 1110.2 emission limits.

In 2009, OCSD embarked on a pilot study of this recommended technology on Engine 1 at Plant 1 to evaluate if the future Rule 1110.2 limit can be met for their biogas-fired IC engines. Design of the pilot system included an SCR system for NO<sub>x</sub> emission reduction, an oxidation catalyst unit for CO and VOC reduction (including formaldehyde), and a DGCS upstream from the IC engines for removal of siloxanes to prevent fouling of the catalysts. Additional benefits of the DGCS include the removal of total reduced sulfur and total volatile organic compounds. To supplement and support this study, SCAQMD issued a grant to OCSD (SCAQMD Contract #10114, 2009) for this pilot test study, and will be evaluating the data collected as part of their technology assessment of the feasibility of biogas engines achieving the future Rule 1110.2 emission limits for biogas-fired engines. The operation of the pilot study was granted a Permit to Construct/Operate for an Experimental Research Project by SCAQMD (Application Number 497717) (Appendix A-1).

## 1.2. SCAQMD Rule 1110.2

The IC engines at OCSD are subject to Rules 1110.2. Rule 1110.2 provides emission limits and monitoring requirements for all stationary and portable engines over 50 brake-horsepower (bhp). Rule 1110.2 (*Emissions from Gaseous- and Liquid- Fueled Engines*) was promulgated to reduce the NO<sub>x</sub>, CO and VOC emissions from engines over 50 bhp. On February 1, 2008, Rule 1110.2 was amended in order to achieve further emissions reductions from stationary engines based on the cleanest available technologies. Under the February 2008 amendments to Rule 1110.2 shown below, more stringent NO<sub>x</sub>, CO, and VOC limits were adopted, to become effective for biogas-fueled engines in July 2012 provided a technology assessment confirms that the limits below are achievable.



- NOx limit was lowered from 36 ppm (or ~ 45 ppm\*) to 11 ppm at 15% O<sub>2</sub>.
- VOC limit was lowered from 250 ppm\* to 30 ppm at 15% O<sub>2</sub>.
- CO limit was lowered from 2,000 ppm to 250 ppm at 15% O<sub>2</sub>.

\* Existing limits allow for an alternative emission limit for OCSD engines based on the engine efficiency correction factor.

The rule allows for some exemptions, including an exemption during engine start-up, to allow for sufficient operating temperatures to be reached for proper operation of the emission control equipment. The start-up period is limited to 30 minutes unless a longer period is approved for a specific engine by the Executive Officer and is made a condition of the engine permit.

### 1.3. Objectives

Because the future Rule 1110.2 emission limits shown above are “technology-forcing,” the SCAQMD Governing Board directed staff to conduct a technology assessment to determine if cost-effective and commercial technologies are available to achieve their limits. This pilot study will be used by SCAQMD as part of that technology assessment to evaluate the ability of the biogas-fueled engines at OCSD wastewater treatment plants to meet these future limits.

The objective of this study is to evaluate the effectiveness of a Cat Ox/SCR system with a DGCS as a post-combustion emissions control technology for an IC engine operating on biogas at a wastewater treatment plant. The data collected will be evaluated as part of the technology assessment study for the 2012 biogas engine emission limits under amended Rule 1110.2. Data were gathered on engine performance and emission reductions. Data were also gathered to obtain information for use in full-scale design (e.g., back pressure, impact on heat recovery unit (HRU)), to assess the performance of the DGCS (e.g., siloxane removal, media life), and to determine the economic feasibility of operating the Cat Ox/SCR system and the DGCS.

### 1.4. Report Organization

This report is organized into the following sections:

- Executive Summary
- Section 1. Project Background and Objectives
- Section 2. Pilot Study Work Plan
- Section 3. Results and Discussion
- Section 4. Cost Effectiveness Analysis
- Section 5. Conclusions and Recommendations

- Appendices

## 2. Pilot Study Work Plan

---

### 2.1. General Description

The engines at the CGS at both the Fountain Valley Reclamation Plant 1 and Huntington Beach Treatment Plant 2 are lean-burn, spark-ignited IC engines, and have been permitted to operate by SCAQMD. Plant 1 has three (3) 2,500 kilowatts (KW) units, while Plant 2 has five (5) 3,000 KW units. The engines are of conventional four-stroke cycle stationary Vee engine construction. They utilize spark-ignited pre-chamber technology to achieve extremely low NO<sub>x</sub> emissions. These electrical power generation stations utilize state-of-the-art low emission, spark-ignited, reciprocating engines fueled by digester gas and/or natural gas to drive generators. The engine generators normally operate in parallel with the grid, providing electrical loads at both plants. Excess power at Plant 2 is exported to the local utility. Waste heat energy in the cooling systems and exhaust are extracted and utilized for process heating through heat recovery units on each engine. Plant 2 has the capability to produce additional electrical energy with waste heat energy through use of a steam turbine-generator. Typically, at any given time one unit is down at Plant 1 and two units are down at Plant 2 for maintenance while the remaining units operate over a range of 60-120% load. Once placed on line, an engine will operate approximately 1,000-2,000 hours before being shut down for routine maintenance.

At Plant 1, each of the three IC engines are rated at 3,471 bhp, and each engine can produce up to 2.5 MW of electricity. This pilot study was conducted on Engine 1 at Plant 1 (see Figure 2-1). Details of the three Plant 1 engines, including Engine 1 are shown in Table 2-1.

Based upon a carefully designed series of studies performed for OCS D to meet existing and emerging regulatory standards, the full-scale pilot study of Engine 1 at Plant 1 included a DGCS using carbon media for removal of siloxanes and other harmful contaminants from the digester gas, and post-combustion control technology using a catalytic oxidizer system to reduce emissions of CO and VOCs, and SCR technology with urea injection for controlling of NO<sub>x</sub> emissions. The engine is equipped with continuous emissions monitoring system (CEMS) at the engine exhaust for measuring NO<sub>x</sub> concentration entering the Cat Ox/SCR system, and at the stack for measuring NO<sub>x</sub>, CO, and oxygen (O<sub>2</sub>) concentrations after the Cat Ox/SCR system. Figure 2-2 and Appendix A-2 shows a schematic of the overall system.

Construction of the pilot study was initiated in October 2009. During the design and construction for the pilot study, two other projects were also in progress at Plant 1:

- J-79-1 Central Generation Automation. During this project, the engine control systems (ECS) for the CGS at both plants were replaced. The existing ECS at both

facilities were no longer being manufactured and parts replacement was not reliable. The new systems provide automatic load management capability, as well as an emissions monitoring feedback signal for exhaust emissions control.

- J-79-1A Continuous Emissions Monitoring Systems. Installation of a CEMS at the stack outlets of the CGS engines at both plants and NO<sub>x</sub> inlet analyzers.

Prior to the start of the full-scale pilot study, both J-79-1 and J-79-1A projects were completed at Plant 1 Engine 1 before the pilot system commenced operation in April 2010 and initial performance testing was performed on both the DGCS and Cat Ox/SCR system.

## 2.2. Digester Gas Cleaning System

Digester gas is generated during the anaerobic digestion of the sewage sludge produced during the wastewater treatment process. This biogas contains contaminants such as hydrogen sulfides (H<sub>2</sub>S), VOCs, and low concentrations of volatile siloxane compounds. Siloxane is a compound that is found in numerous consumer personal products and thus enters the wastewater treatment system. During combustion, the siloxanes convert to silica, sand-like particulate that deposit on the surfaces of combustion equipment contributing to a rapid degradation of engines, gas turbines, and boilers, along with increased maintenance requirements. In addition, the silica also adheres to the catalyst media of any post-combustion control equipment. These deposits can cause masking of the catalyst sites that significantly reduces the effectiveness of the catalyst. Based upon the pilot testing performed at Plant 2 (Malcolm Pirnie, 2008), the DGCS was shown to be successful in removing contaminants such as siloxanes, H<sub>2</sub>S, and VOCs from the digester gas, and extending the catalyst performance life comparable to an IC engine combusting natural gas. In addition, the use of the DGCS resulted in a significant reduction in operations and maintenance (O&M) costs for the CGS engines.

### 2.2.1. DGCS Technology and Equipment

In order to minimize the masking effect from the siloxanes and sulfurous compounds, and prevent the deterioration of the post-combustion Cat Ox/SCR system installed for the pilot study, the digester gas was scrubbed to remove these contaminants prior to combustion. A DGCS (SAG™) supplied by Applied Filter Technology, Inc. (AFT) and consisting of a single carbon media vessel was installed at Plant 1. The SAG™ process was developed to remove siloxanes and other contaminants considered harmful to power generation equipment including engines, gas turbines, fuel cells and boilers. The media also treats VOCs, H<sub>2</sub>S, and other sulfides. The vessel contains three layers of specialized graphite-based molecular sieves, which are small to large black pellets or spheres, capable of removing, through adsorption, the siloxanes from the biogas. The sieve types and layer depths (and the resulting vessel size) are determined by gas analysis to confirm system performance parameters. The biogas enters the SAG™ vessel at the top and proceeds down through the layers of sieves, exiting through flanged septa connected to a

manifold header. Each layer removes a specific type of contaminant and, in turn, protects the layer following it by removing contaminants that can foul it. The SAG™ siloxane media is a loose pellet form of polymorphous graphite carbon-based media specifically designed for removal of siloxanes in methane, and can be disposed of as a non-hazardous waste at a local approved site. Following system start-up, the vessel is allowed to process the biogas until there is breakthrough. In the present pilot study, the potential for media breakthrough was conservatively determined using H<sub>2</sub>S as a marker. Once the potential for breakthrough is determined, the media is scheduled for change out. The vessel is then taken out of service, the media is replaced, and the vessel is returned to service.

The SAG™ unit used in the pilot study was a single stage, 7.5 ft diameter by 8 ft straight-sided dished downflow carbon steel filter unit. The unit contained 9,900 lbs of SAG™ three-stage media for siloxane removal. It includes interior high build epoxy coating and corrosion allowance vessel plate thickness. The DGCS system was sized and designed such that it could be used to clean all the digester gas produced at Plant 1. The DGCS was designed for the conditions presented in Table 2-2.

The DGCS was located along the south side of the Gas Compressor Building. Figure 2-3 shows a photograph of the DGCS at the Plant 1.

### **2.2.2. DGCS Measurement and Monitoring Methods**

One objective of this pilot study was to assess the performance of the DGCS with respect to the removal of siloxanes and other contaminants, along with the life of the removal media. Based on the pilot testing performed at Plant 2 Engine 3, the DGCS proved successful in removing contaminants from the digester gas. The catalyst at Plant 2 Engine 3 fouled rapidly after combustion of uncleaned digester gas. Catalyst performance with the DGCS was comparable to that of a catalyst installed on the exhaust of an IC engine operating on natural gas.

Testing was performed to determine if the equipment met the design specifications. Two sampling methods are commonly used for measuring siloxanes: gas chromatography-mass spectrometry (GC/MS) and the wet chemistry method. Digester gas analyzed using GC/MS can be collected using either Tedlar® bags or canisters. The wet chemistry method requires samples to be collected using methanol impingers over a two to four hour sampling period, and then sent to a lab for analysis. After discussions with several certified laboratories, and review of several published papers, both methods were found to have merit; however, the collection of the samples using Tedlar® bags for measurement by GC/MS provided the most flexibility for minimum sampling time and equipment required. In the initial performance testing of the gas cleaning system, samples were collected using Tedlar® bags, canister, and methanol impinger methods at the digester gas inlet location at the same time, during the same day, and the analytical results were compared to determine the most appropriate method for analyzing

performance breakthrough. During the initial test, individual measurements of inlet total siloxane, consisting of, hexamethylcyclotrisiloxane (D3), octamethylcyclotetrasiloxane (D4), decamethylcyclopentasiloxane (D5), hexamethyldisiloxane (L2), octamethyltrisiloxane (L3), and any other siloxane compounds identifiable according to the test method, were recorded.

For the sampling performed using Tedlar® bags at the DGCS inlet, the samples were collected and sent to a certified laboratory for the analysis of speciated siloxanes using TO-14/15, speciated VOCs using TO-15, total reduced sulfides using EPA 1023 Method 16B, or ASTM Procedure D-5504 GC/SCD, and the overall gas components and quality (% CH<sub>4</sub>, % CO<sub>2</sub>, % N<sub>2</sub>, heating value using) using EPA Method 3C. One sample was also collected at the DGCS outlet to confirm that the DGCS met performance standards for all siloxanes to be measured as non-detect (i.e., below Method Detection Limit, MDL).

Samples were also collected in SUMMA® canisters at the DGCS inlet and sent to a certified laboratory for analysis of speciated siloxanes. In addition, speciated VOCs were analyzed using TO-15, total reduced sulfides were analyzed using ASTM D-5504, and overall gas components and quality (% CH<sub>4</sub>, % CO<sub>2</sub>, % N<sub>2</sub>, heating value) was analyzed using ASTM D-1946.

The wet chemistry method was used at the DGCS inlet. During the test, the digester gas sample was collected using methanol impingers over a 4-hour period, and the samples were sent to the laboratory for individual measurements of inlet total siloxane.

Hydrogen sulfide testing was conducted weekly using Draeger® tubes. The H<sub>2</sub>S concentration was used as an indicator that the media was nearing saturation. Breakthrough itself was determined to occur when the total siloxane concentration at the outlet of the carbon adsorber was above the MDL or when the H<sub>2</sub>S concentration reached 15 ppm. Originally, the monitoring plan recommended by the vendor, AFT, was to use an H<sub>2</sub>S concentration threshold of 5 ppm at the outlet to trigger siloxane and siloxane compound testing every week until breakthrough occurred. However, a more conservative approach for media saturation was used for the pilot study. Saturation and media replacement was triggered when measurable H<sub>2</sub>S levels (generally around 1 ppm) were found using the Draeger® tube readings. The procedures used for taking the Draeger® tube measurements are shown in the Monitoring Test Procedure in the CD attached to this report. OCS staff also performed routine sampling of the digester gas for H<sub>2</sub>S (Draeger® tubes), sampling for reduced sulfides (SCAQMD Method 307-91), and sampling for speciated VOCs (TO-15).

### 2.2.3. Selection of DGCS Sampling Method

Details of the DGCS performance test are presented in a Technical Memorandum (Malcolm Pirnie, May 5, 2010) found in Appendix A-3. Table 2-3 summarizes the results of the comparison of siloxane sampling methods.

As shown in the summary of the results shown in the table, the Tedlar® bag sampling method detected the highest level of total siloxane. In addition, the Tedlar® bag sampling method provided the most flexibility for minimum sampling time and equipment required. Based on these criteria, the Tedlar® bag method was chosen as the sampling method for the digester gas sampling for siloxanes.

### 2.3. Cat Ox/SCR System

Based on the results of the Catalytic Oxidizer Study on Plant 2 Engine 3 (Malcolm Pirnie, 2007) and the Feasibility Study (Malcolm Pirnie, 2008), the combination of a catalytic oxidizer followed by selective catalytic reduction equipment with urea injection provided by Johnson Matthey (JM) was selected for the pilot study.

Catalytic oxidation is a post-combustion control technology which has been commercially proven to reduce CO, VOCs and air toxics, including formaldehyde and acrolein, from engines burning natural gas. There is, however, limited performance data for an engine fired with digester gas, either with or without a gas cleaning system. The digester gas, which is generated during the biological consumption of solids that are collected during the wastewater treatment process, contains low but detrimental concentrations of siloxane compounds, which convert to silica during combustions and deposit on the surfaces of post-combustion equipment, including catalyst media. This fouling of the catalyst, or catalyst masking, significantly reduces the effectiveness of the catalyst. In order to minimize this masking effect, the digester gas can be pre-cleaned to remove these siloxanes prior to combustion.

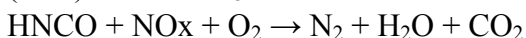
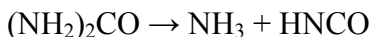
The Johnson Matthey catalyst elements are manufactured in a “block” form. The catalyst block substrate is made from stainless steel foil that is retained by a stainless steel frame. This structure undergoes a proprietary coating process in which the foil is chemically treated to increase surface area. Active platinum group metal catalysts are then applied. The coating, catalyst composition, and honeycomb pore size were designed by Johnson Matthey to provide optimum durability and pollutant removal efficiency for the specified operating environment.

In the SCR system, the exhaust enters a mixing tube where a stream of atomized urea is introduced into the gas. The urea quantity is controlled by the urea injection control system. Mixing vanes distribute the atomized particles throughout the exhaust gas. Ammonia is formed from aqueous urea ((NH<sub>2</sub>)<sub>2</sub>CO) after the urea injection, which involves evaporation of water, thermal decomposition of urea, and finally hydrolysis of

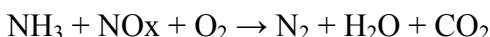


iso-cyanic acid. Evaporation of water is initiated when the aqueous urea is injected into the exhaust gas pipe. This mixture then enters the SCR housing. A chemical reaction between the ammonia from the urea, the exhaust gas NO<sub>x</sub> component, and SCR catalyst results in the reduction of the NO<sub>x</sub> into nitrogen (N<sub>2</sub>), carbon dioxide (CO<sub>2</sub>), and water (H<sub>2</sub>O). The basic equations are:

#### Urea Reaction



#### Ammonia Reaction



The percent reduction of NO<sub>x</sub> is determined by the amount of urea introduced into the gas flow.

The Cat Ox/SCR system was installed in a horizontal position on a platform, elevated at a height of approximately 14 feet directly west of Engine 1 at Plant 1. This platform-mounted installation allowed for easy access to the equipment and access to the roadway underneath the platform. Figure 2-4 shows a photograph of the platform installation. The Cat Ox/SCR system was designed for the conditions and performance guarantees presented in Tables 2-1 and 2-4, respectively.

### 2.3.1. SCR/Catalytic Oxidizer System Technology and Equipment

**Oxidation Catalyst Housing.** The oxidation catalyst consisted of one Johnson Matthey Model 4040SS-4-30/36 housing for the catalyst at Engine 1. The housing has access doors on both sides of the housing, with four tracks for installing catalyst. One of the tracks houses the initial catalyst supplied, with three tracks available for later expansion if needed. There is a 30-inch flange on the inlet and a 36-inch flange on the outlet of the housing. When completely full of catalyst (4 layers), the total weight of the housing plus the catalyst is about 8,190 pounds. The housing has a number of two <sup>3</sup>/<sub>4</sub> inch ports on the inlet and two <sup>3</sup>/<sub>4</sub> inch ports on the outlet of the oxidation catalyst housing.

**Oxidation Catalyst.** A total of sixteen (16) whole oxidation catalyst blocks were part of this system. They were arranged 4 blocks wide x 4 blocks high x 1 block deep. [A whole block is approximately 2 feet wide x 2 feet tall x 3<sup>1</sup>/<sub>4</sub> inches deep and constitutes approximately 1 ft<sup>3</sup> of catalyst volume.] The cell density of this catalyst is 200 cells per square inch (cpsi). Figure 2-5 shows a photograph of the catalyst.

**SCR Catalyst Housing.** Johnson Matthey provided a JM Model 4040SS-4-36 housing for the catalyst. The housing was fabricated in 304 stainless steel. Two layers of catalyst were installed and there were two open tracks for addition of another layer if desired at a later date. The housing was equipped with access doors on both sides of the housing.



There are 36-inch inlet and outlet flanges (150# ANSI) provided on the housing. When completely full of catalyst (4 layers), the total weight of the housing plus the catalyst is approximately 8,190 pounds. The housing has a number of two  $\frac{3}{4}$  inch ports on the inlet and two  $\frac{3}{4}$  inch ports on the outlet of the SCR housing for sampling.

**SCR Catalyst.** The catalyst consists of thirty-two (32) whole SCR catalyst blocks on 200 cpsi metal substrate. They are arranged 4 blocks wide x 4 blocks high x 2 blocks deep. [A whole block is approximately 2 feet wide x 2 feet tall x  $3\frac{1}{4}$  inches deep, and constitutes approximately 1 ft<sup>3</sup> of catalyst volume.]

**Urea Injection Control System.** This system was designed to control the injection rate of urea into the SCR based on engine load for one fuel blend. During the initial commissioning of the system, the engine load, the urea injection rate, and the NOx and ammonia outlet concentrations were measured and mapped. Mapping refers to the process in which the urea injection rate is correlated to the engine load in order to meet the desired NOx exhaust concentration. The system allowed for up to 25 combinations of engine load versus urea injection rate (set points).

In addition to the load map control, the injection system also uses a system of bias set points to trim the urea injection. The NOx curve bias is a percentage that can be input by the operator to increase or decrease the urea injection rate. This bias is typically set to 0%, but can be modified if engine operation is expected to change the NOx produced in the exhaust emissions. The NOx add bias increases the urea injection rate by an input gallon per hour setting based on the NOx outlet concentration from the stack exhaust CEMS analyzer. When the NOx outlet concentration reaches the level set in the control system, the urea injection rate will increase by the bias set point. The NOx subtract bias decreases the urea injection rate in the same manner. For the pilot test, no NOx subtract bias was set.

The SCR process requires precise control of the urea injection rate. An insufficient injection may result in unacceptably low NOx conversions. An injection rate that is too high can result in release of excessive ammonia emissions. These excess gaseous ammonia emissions are known as “ammonia slip”. Under the research permit for this study, the maximum allowable ammonia slip is 10 ppm. Excess ammonia can lead to clogging and equipment problems in downstream equipment. In addition, emissions of ammonia slip to the atmosphere can result in odors and a visible plume. The ammonia slip increases at higher NH<sub>3</sub>/NOx ratios. The stoichiometric NH<sub>3</sub>/NOx ratio is approximately 1.

### 2.3.2. Cat Ox/SCR Measurement and Monitoring Methods

**Preliminary Testing/SCR Urea Injection Mapping.** The objective of the preliminary testing was to measure the performance of the system at varying loads and fuel blends

(i.e., digester gas and natural gas), and to map the urea injection system. The CO, NO<sub>x</sub>, and O<sub>2</sub> concentrations at varying engine loads and fuel distributions at the inlet of the oxidation catalyst and the outlet of the SCR catalyst were monitored for a period of six (6) hours at ten (10)-minute intervals using the TESTO® 350 XL Portable Monitor during startup as part of the preliminary testing. In addition, ammonia measurements were taken at the outlet of the SCR catalyst at ten (10)-minute intervals using Draeger® tubes. A data logger was used to monitor temperature and pressure differential on a real-time basis over the six (6)-hour testing period. Carbon monoxide was also monitored with the TESTO® 350 XL Portable Monitor. Load and fuel distribution of the engine were varied according to the schedule shown in Table 2-5. The recorded data is provided in Appendix C-1.

A secondary objective of the preliminary testing was to provide varying load and fuel scenarios for Johnson Matthey to map the urea injection system. A description of the SCR urea injection mapping during the pilot test is provided in a technical memorandum in Appendix A-4. Figure 2-6 presents a mapping diagram of the urea injection rate designed for a 95% digester gas to natural gas fuel blend during the pilot testing period after system adjustments were made on June 8, 2010.

**Source Testing Using Compliance Methods.** Source testing using SCAQMD compliance methods was performed after preliminary testing of the Cat Ox/SCR system and equipment startup and commissioning in order to measure the emissions of the system. The following summarizes the source testing using compliance methods performed on April 7-8, 2010:

- The initial testing using compliance methods was performed for one fuel blend (95% digester gas and 5% natural gas)
- Source testing was performed to sample for CO, NO<sub>x</sub>, VOCs, ammonia, and aldehydes (formaldehyde).
- SCAQMD Method 100.1 was used to measure NO<sub>x</sub>, CO, CO<sub>2</sub>, and O<sub>2</sub> concentrations, modified CARB Method 430 was used to measure aldehydes (i.e., formaldehyde), Method 25.3 was used to measure total non-methane non-ethane organic compounds (NMNEOC), and modified SCAQMD Method 207.1 was used for measuring ammonia.

Table 2-6 describes details of the April 2010 initial test program using compliance methods.

## 2.4. Pilot Study Test Program Timeline

Table 2-7 presents the pilot study project timeline. The full equipment commissioning took place between March 23 and April 1, 2010. The pilot testing was conducted from April 1, 2010 through March 31, 2011. Since Engine 1 is used to provide power to the

plant, it continued operation throughout the construction and commissioning of the system, with occasional stoppages as needed by the present study as well as the J-79-1 and J-79-1A projects.

**Table 2-1:  
Engine 1 Design Parameters**

Manufacturer:	Cooper-Bessemer
Model:	LSVB-12-SGC
Cycle:	4-stroke
Bore:	15½ in
Stroke:	22 in.
Configuration:	Vee-12
Rated Speed:	400 RPM
Rated Output:	2,500 KW
BMEP:	138 psi
Horsepower	3,471 bhp
Load	100%
Operating Hours per Year	Up to 8,760
Type of Fuel	Cleaned Digester Gas / Natural Gas
Design Exhaust Flow Rate	27,555 acfm
Design Exhaust Temperature	800°F

**Table 2-2:  
DGCS Design Specifications**

Gas Description	Anaerobic digester gas
Flow	1440 scfm
Pressure drop per foot of media	0.5 in. w.c.
Pressure drop total with piping	7.5 in. w.c
Pressure - actual	58 psig inlet (actual)
Pressure - design	150 psig
Maximum gas inlet Temperature	70°F
Maximum Ambient Temperature	100°F
Minimum Ambient Temperature	40°F
Humidity	Saturated at 70°F
Siloxane – design	5 ppm
Siloxane – current	5 ppm
Total Reduced Sulfur (H <sub>2</sub> S) - design	50 ppm
Total VOC – design	50 ppm
Siloxane removal	Below best available detection limit at time of testing (i.e. 100 ppbv per species using methanol impinger; or 500 ppbv per species in Tedlar® bag by GC/MS)

**Table 2-3:  
Comparison of DGCS Sampling Methods**

<b>Comparison of DGCS Sampling Methods</b>	
<b>DGCS Inlet</b>	<b>Total Siloxane (ppbv)</b>
Tedlar® – Inlet	3,584
SUMMA Canister – Inlet	554
Methanol Impinger – Inlet	1,457

**Table 2-4:  
Cat Ox/SCR Performance Guarantees**

<b>Exhaust Component</b>	<b>Maximum Catalyst System Inlet (ppmv)</b>	<b>Maximum Catalyst System Outlet (ppmv)</b>	<b>Reduction Guarantee</b>
NOx	50	9	82.0%
VOC	120	25	79.2%
CO	800	100	87.5%
Free Ammonia Slip	N/A	10	N/A

- Notes: 1) Provided by Johnson Matthey price quotation, dated May 8, 2009.  
2) N/A indicates not applicable. Ammonia was not measured before the catalyst.

**Table 2-5:  
Preliminary Testing Schedule**

<b>Test Run</b>	<b>Engine Load %</b>	<b>Natural Gas/Digester Gas Fuel Ratio (% NG / % DG)</b>	<b>Time Period (min)</b>
1	60	50 / 50	30
2	80	50 / 50	30
3	100	50 / 50	30
4	110	50 / 50	30
5	60	100 / 0	30
6	80	100 / 0	30
7	100	100 / 0	30
8	110	100 / 0	30
9	60	5 / 95	30
10	80	5 / 95	30
11	100	5 / 95	30
12	110	5 / 95	30



**Table 2-6:  
Initial Pilot Study Test Program (95% Digester Gas and 5% Natural Gas)**

Parameter	Reference Method	Load	No. of Tests	Sample Location
Aldehydes <sup>(1)</sup>	Modified CARB Method 430	Max.	2 2	Catalytic Oxidizer Inlet Stack Exhaust
Volume Flow	SCAQMD 1.1-4.1 EPA 19	Max. Normal Min.	1	Stack Exhaust
NO <sub>x</sub> , CO, O <sub>2</sub> and CO <sub>2</sub>	SCAQMD 100.1	Max. Normal Min.	1	Stack Exhaust
Ammonia	Modified SCAQMD 207.1	Max. Normal Min.	2	Stack Exhaust
VOCs (as NMNEOC)	SCAQMD 25.3	Max.	1	Catalytic Oxidizer Inlet SCR Outlet Stack Exhaust
NO <sub>x</sub> , CO, O <sub>2</sub>	CEMS	N/A	N/A	Stack Exhaust
NO <sub>x</sub> , O <sub>2</sub>	CEMS	N/A	N/A	Catalytic Oxidizer Inlet

Note: 1) Aldehydes analysis included formaldehyde, acetaldehyde, and acrolein.  
2) N/A indicates not applicable.

**Table 2-7:  
Pilot Study Project Timeline**

<b>Action</b>	<b>Date</b>
Project Construction Period	10/2009 – 3/2010
<b>Commissioning</b>	
■ Digester Gas Cleaning System Commissioning (AFT)	3/9/10
■ Cat Ox/SCR System Commissioning (Johnson Matthey)	3/22/10-3/31/10
Preliminary Testing/SCR Urea Injection Mapping (Johnson Matthey)	3/31/10 – 4/1/10
<b>Pilot Study – Commence Testing</b>	<b>4/1/10</b>
Source Testing using Compliance Methods (SCEC)	4/7/10 – 4/8/10
Urea Injection Mapping Adjustment #1 (Johnson Matthey)	5/13/10
Urea Injection Mapping Adjustment #2 (Johnson Matthey)	6/8/10
Completed Pilot Testing	3/31/11
<b>Post-Pilot Study Testing</b>	<b>4/1/11 – present</b>
Urea Injection Mapping Adjustment #3 (Johnson Matthey)	4/11/11 – 4/12/11

Figure 2-1: Plant 1 Engines 1, 2, and 3 (pictured left to right)



Figure 2-2: Schematic of the Pilot Testing System

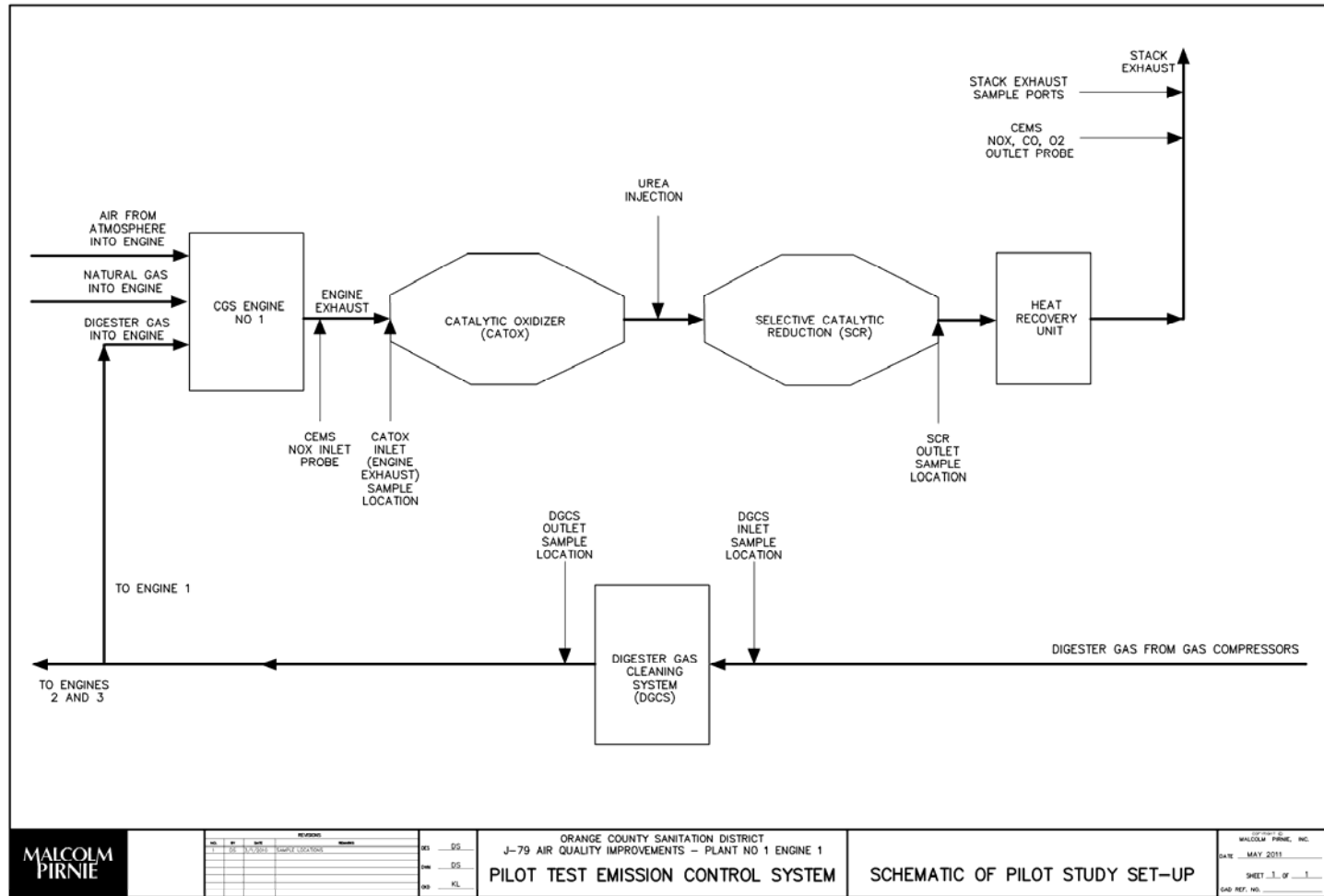


Figure 2-3: Digester Gas Cleaning System

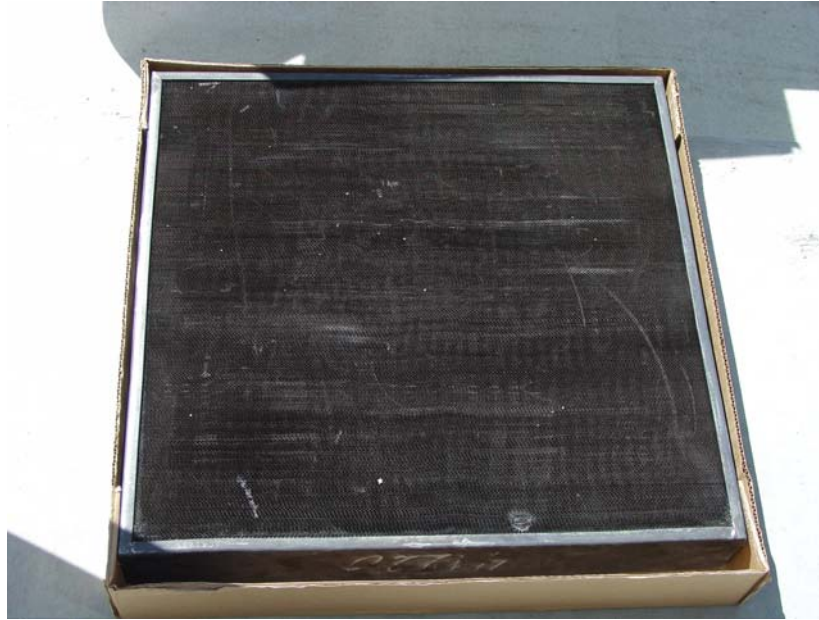




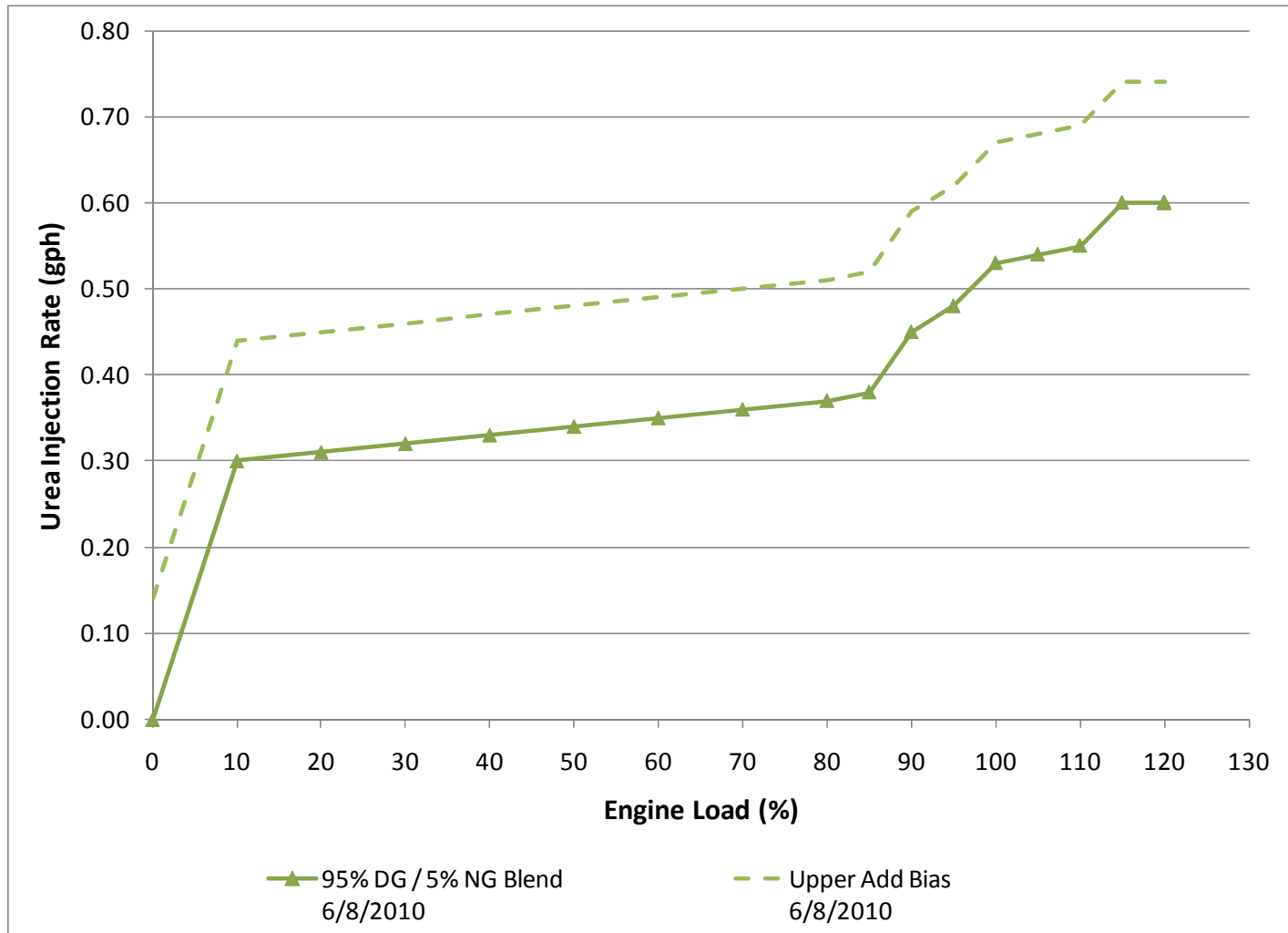
Figure 2-4: Cat Ox/SCR Platform Installation



Figure 2-5: Catalyst and Housing



**Figure 2-6: SCR Urea Injection Curve for Pilot Testing**  
(June 8, 2010 through March 31, 2011)





## 3. Results and Discussion

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### 3.1. Digester Gas Cleaning System

The digester gas cleaning system installed at Plant 1 was designed to remove siloxanes and other impurities from the digester gas prior to being used to fuel the three IC engines. Throughout the pilot study, the performance of the DGCS system was evaluated by monitoring for carbon media performance and change out frequency. Samples for the family of siloxanes, H<sub>2</sub>S, and speciated VOCs in the digester gas were taken at the inlet and outlet to the DGCS carbon vessel, and sent to the laboratory for testing. When the testing indicated that the DGCS media needed replacement, flow to Engine 1 was curtailed until the media was replaced. Digester gas continued to be used by Engines 2 and 3 since they were not equipped with post-combustion catalyst controls that could be fouled by the siloxanes and other contaminants in the digester gas. Once the DGCS media was replaced, the testing was resumed on Engine 1.

#### 3.1.1. DGCS Sample Integrity

The composition of the digester gas at the inlet to the DGCS was tested for a number of compounds, including H<sub>2</sub>S, as an indicator compound for media breakthrough, reduced sulfides, siloxanes, and a number of speciated VOCs. Since the sampling was performed using Tedlar® bags, and occasionally SUMMA canisters, the potential exists for ambient air to be captured along with the digester gas, thus diluting the sample. In order to assure that the samples were not diluted, the fixed gas composition of the gas was also measured. Fixed gases are gases for which no liquid or solid can form at the temperature of the gas, such as air at typical ambient temperatures. In the present study, N<sub>2</sub>, O<sub>2</sub>, CO<sub>2</sub>, and CH<sub>4</sub> were the fixed gases sampled. The digester gas typically consisted of 36% carbon dioxide, 61% methane, 2% nitrogen, and less than 1% oxygen. In the event that ambient air is pulled into the digester gas sample bag, the percentage of nitrogen will be significantly greater than 2%, and the concentrations of the digester gas contaminants would be diluted.

A summary of the fixed gas composition sampling data from March 2010 through February 2011 is shown in Table 3-1. The full fixed gas composition data set is found in Appendix B-1. Over the course of this fixed gas composition sampling, three samples were eliminated due to errors in sample collection that led to a nitrogen percentage greater than 5%; one sample set (Tedlar® and Summa canister) was also eliminated due to extremely high nitrogen concentrations indicating that ambient air had leaked into the sample. However, a comparison of the inlet and outlet fixed gas composition demonstrated that the integrity of the overall digester gas samples taken was maintained with inlet and outlet concentrations of CO, CH<sub>4</sub>, N<sub>2</sub>, and O<sub>2</sub> staying within the range

expected, indicating that the carbon media did not adsorb methane or the other fixed gases.

### 3.1.2. Digester Gas Quality

Table 3-2 presents the results of the reduced sulfides component of the digester gas. The data indicate that H<sub>2</sub>S is the biggest constituent of the reduced sulfides sampled. The average H<sub>2</sub>S concentration was approximately 26 ppmv. The high H<sub>2</sub>S input concentration makes it a good indicator compound for detecting catalyst media breakthrough at the outlet of the system. Table 3-3 presents the results of the speciated siloxane sampling. Typical of digester gases in general, D5 and D4 are the largest siloxane components of the Plant 1 digester gas. Table 3-4 presents the results of the VOC sampling. The reduced sulfide, speciated siloxane, and VOC data sets are found in Appendices B-2, B-3, and B-4, respectively.

### 3.1.3. DGCS Performance

The DGCS was monitored for carbon media performance and change out frequency throughout the study. Digester gas samples were taken at the inlet and outlet of the DGCS carbon vessel for total siloxane concentration and H<sub>2</sub>S, and at the inlet for speciated siloxanes, reduced sulfides, and VOCs. Samples below the method detection level (MDL) were not used in the summary analysis.

Siloxane samples were collected using Tedlar® bags and analyzed using GC/MS at both inlet and outlet of the system. Due to the length of time required to analyze the siloxane samples (approximately several days to two weeks), H<sub>2</sub>S sampling at the DGCS outlet using Draeger tubes was used as a real-time indicator of the DGCS carbon media performance. When H<sub>2</sub>S was detected in the DGCS outlet above approximately 1 ppmv, Engine 1 was shut-down to prevent fouling of the catalyst material until the carbon media was replaced in the DGCS. The use of 1 ppmv H<sub>2</sub>S as an indicator for potential media saturation is a conservative threshold selected to ensure that media breakthrough would not occur during the study. Table 3-5 presents the results of the siloxane and H<sub>2</sub>S sampling. The table indicates that the siloxane concentrations at the inlet varied over the course of the study. As shown in Table 3-3, the average inlet concentration of total siloxanes at was approximately 5.0 ppmv. The DGCS generally removed siloxanes to below the MDL.

The carbon media was replaced three times during the pilot study: in June 2010, in September 2010, and in February 2011 after treatment of approximately 147, 174, and 157 million cubic feet of digester gas, respectively. Appendix B-5 provides a summary of reduced sulfide and speciated siloxane sampling events with DGCS carbon media use and change out frequencies. This media change-out information will be used in the cost evaluation for the overall system presented in Section 4. The effectiveness of DGCS media life may be longer than experienced during the current pilot testing because the

media change-outs were conservatively scheduled to protect the catalyst. For longer term operations, a design change to optimize media life could include the installation of two vessels in series. The second vessel would act as a polisher to provide catalyst protection from siloxane breakthrough while allowing the media in the primary vessel to be completely exhausted.

### **3.2. Cat Ox/SCR System**

The purpose of the demonstration project testing program was to evaluate the effectiveness of the Cat Ox/SCR system for removal of CO, VOC, and NO<sub>x</sub> to comply with amended Rule 1110.2, to monitor for ammonia slip, and to evaluate the performance of the engine with the emissions control equipment installed. The pilot testing of the Cat Ox/SCR system began on April 1, 2010, immediately after completion of the SCR urea injection mapping by Johnson Matthey. The pilot study continued until March 31, 2011.

The concentrations of CO, NO<sub>x</sub>, and O<sub>2</sub> in the engine exhaust gas before and after the Cat Ox/SCR system were determined by an independent source testing firm using SCAQMD Method 100.1, a chemiluminescent compliance testing method, during source testing on April 7 and 8, 2010. Routine monitoring of CO, NO<sub>x</sub>, and O<sub>2</sub> concentrations using OCSD's TESTO 350 XL portable handheld analyzer was also performed. The use of the portable analyzer measuring CO and NO<sub>x</sub> allowed for numerous data sets to be collected at regular intervals throughout the pilot study. The detailed portable analyzer test report can be found in Appendix C-1. In addition, a CEMS monitored and recorded the 15-minute block average NO<sub>x</sub> concentrations at the catalytic oxidizer inlet (engine exhaust) and the NO<sub>x</sub>, CO and O<sub>2</sub> concentrations at the stack exhaust. VOC concentrations were measured periodically at the engine exhaust and stack exhaust using SCAQMD Method 25.3.

The results of the source testing at Plant 1 using SCAQMD compliance methods on April 7-8, 2010 and SCAQMD Rule 1110.2 compliance testing in January 2011 are shown in Tables 3-6 and 3-7, respectively. Results for the January 2011 source testing at Plant 1 in Table 3-7 are also shown for Engines 2 and 3 for comparison. As shown in the January 2011 annual compliance test results (Table 3-7), the average NO<sub>x</sub> and CO concentrations in Plant 1 Engine 1 over three loads are 6.2 and 7.9 ppmv, respectively. This is lower than the average Engines 2 and 3 NO<sub>x</sub> and CO concentrations over three loads of 30.2 and 390.5, respectively. Results of the routine pilot test sampling events are provided in Section 3.3.

### **3.3. Compliance with Future Rule 1110.2 Emission Limits**

The results of the pilot study were evaluated for compliance with the future Rule 1110.2 emission limits. The CO and VOC results represent data collected after the initial startup of the equipment from April 1, 2010 through March 31, 2011. The NO<sub>x</sub> results represent

data collected after the urea injection system was optimized on June 8, 2010 through March 31, 2011.

### **3.3.1. Carbon Monoxide Concentration**

CO concentration data were collected during source testing at the engine exhaust and stack exhaust routinely throughout the pilot testing period using the hand-held portable analyzer at the engine exhaust and SCR outlet and also continuously at the stack exhaust by the CEMS. The data collected during these events is summarized in Table 3-8. All CO data collected by the portable analyzer and the CEMS are presented in Appendices C-1 and C-3, respectively.

The CO concentration data at the engine exhaust (CO inlet) and the stack exhaust (CO outlet) are presented graphically in Figure 3-1. The CO inlet concentration was measured with the portable analyzer. The CO outlet concentration, measured by the CEMS, is shown as the maximum daily 15-minute average CO outlet concentration. The percent reduction in CO concentration measured across the Cat Ox/SCR system by the portable analyzer consistently exceeded 96% reduction. This performance was consistent when firing either digester or natural gas. This CO concentration removal rate exceeds the expected performance based upon the catalytic oxidizer vendor guarantee of 87.5% CO removal, provided in Table 2-4.

### **3.3.2. Volatile Organic Compounds Concentration**

The VOC concentration data in terms of NMNEOC was collected during source testing at the engine exhaust, the stack exhaust, and routinely throughout the pilot testing period using SCAQMD Method 25.3. All data collected is presented in Appendix C-2. As shown in Table 3-9, the average VOC concentration at the stack exhaust was 3.58 ppmv, below the emission limit of 30 ppmv in the future Rule 1110.2.

Data measured during the pilot testing period were compared to VOC concentrations measured for the OCSD Rule 1110.2 Annual Permit Compliance Test Report for Year 2011. Table 3-7 summarizes the annual permit compliance VOC test results for OCSD Plant No. 1.

The average uncontrolled VOC concentration for Engines 2 and 3 during the compliance testing was 97 ppmv, while the controlled VOC concentration from Engine 1 stack exhaust was 3.24 ppmv. This is in the same range of the VOC concentrations measured during the pilot testing period (i.e., 3.58 ppmv), confirming the effectiveness of the catalytic oxidizer (at approximately 96%) in removing VOCs from the engine exhaust.

It should be noted that the stack exhaust VOC concentrations for Engines 2 and 3 of 97.2 and 96.9 ppmv, respectively, are much higher than the VOC concentrations measured at the Engine 1 engine exhaust during the pilot testing period, which averaged 21.84 ppmv

(refer to Appendix C-2). One possible explanation to this is the arrangement of the Engine 1 sampling port before the catalytic oxidizer. Typically, when sampling using SCAQMD Method 25.3, two samples are gathered from two separate probes and the results of the analyses are averaged. In the case of this pilot study, the valve at the engine exhaust sampling port was not large enough to locate two adjacent probes, and it was not possible to expand the sampling port. Therefore, the sample and duplicate sample were not taken at the same time, but one after the other. The VOC data collected at the engine exhaust represents the higher of the two sample data results, in line with SCAQMD's general mandate that the higher value be reported when the results differ by more than 20%. Despite the lower accuracy in the engine exhaust sample due to the sizing of the sampling port, the sample taken at the stack exhaust location met the SCAQMD accuracy criteria.

### 3.3.3. Nitrogen Oxides Concentration

NOx concentration data were collected during source testing at the engine exhaust and stack exhaust, routinely throughout the pilot testing period using the portable hand-held analyzer at the engine exhaust, after the catalytic oxidizer and stack exhaust; and continuously at the engine exhaust and stack exhaust by the CEMS.

Based on the results of previous source testing, it is observed that the concentration of NOx produced in the engine exhaust for a given load is higher when firing natural gas than when firing digester gas at any given load. Therefore, the efficiency of the SCR system is reduced as the percentage of natural gas increases. The original urea injection set points, set on April 1, 2010 during commissioning, were set for a blend of digester gas and natural gas. The set points, which are a function of engine load, were adjusted on June 8, 2010 to decrease urea flow because a higher ratio of digester gas to natural gas was fired in Engine 1 than was originally anticipated. Therefore, the urea injection rates were reduced to control a lesser concentration of NOx in the exhaust gas. The data presented in this section represents the pilot testing period from June 8, 2010 through March 31, 2011. The data collected during this period are summarized in Table 3-10. The entire dataset collected is presented in Appendix C-3.

The NOx concentration data at the engine exhaust and the stack exhaust measured by the CEMS are presented graphically in Figure 3-2. The NOx inlet and outlet concentration is shown as the daily maximum 15-minute average NOx concentration. The percentage reduction in NOx concentration measured across the Cat Ox/SCR system by the portable analyzer ranged from 76 to 98%. This NOx concentration removal rate is close to the expected performance based upon the Cat Ox/SCR vendor guarantee of 82% NOx removal. A review of the NOx concentration data over the period of the pilot study indicates that the performance of the SCR is affected both by the ratio of digester to natural gas used as fuel in the engine, and by the system's responsiveness to engine operating parameters, such as start-up and differing load conditions. The inability of the

SCR system to meet the vendor guarantee may be due to periods of increased natural gas flow in the fuel gas. This was to be expected because the urea injection system was mapped for a primarily digester gas (greater than 95 percent) fuel blend. The control system can only be set with one set of engine load to urea injection set points and is not designed to change urea injection rates depending on the fuel blend. Johnson Matthey has not designed a control system that can accommodate varying loads and fuel blends. Therefore, during periods when the fuel is supplemented by natural gas, the NOx removal efficiency is expected to be reduced. If the set points were adjusted for a natural gas fuel usage, which is atypical, the system may over-inject urea potentially causing an ammonia slip as discussed below.

### **3.3.3.1. NOx Concentrations Above Rule 1110.2 Limit**

During the pilot testing period, the NOx outlet concentration occasionally spiked above the future Rule 1110.2 limit of 11 ppmv. NOx concentrations are measured continuously by the CEMS system and averaged in 15-minute blocks for compliance purposes. For the purposes of this Report, each 15-minute block is defined as a “period”. A “high NOx outlet event” is defined as one period or multiple periods in a short time span where the NOx outlet concentration exceeds 11 ppmv. The NOx outlet concentration exceeded 11 ppmv for a total of 97 high NOx outlet events (940 periods out of 21,285 periods of engine operating time) during the pilot test.

Many of the high NOx outlet events were removed from the data set when evaluating performance of the SCR system. A majority of the spikes in NOx outlet concentration correlated with high NOx outlet events when: 1) the engine had just come online, 2) there was an increase in the percentage of natural gas in the engine fuel blend, 3) engine loads exceeded the loads mapped during the initial urea injection rate programming, and 4) operational adjustments of the Cat Ox/SCR system took place. Once excursions over 11 ppmv were screened for exempt or non-valid conditions such as engine start-up and non-control system error, 181 15-minute periods out of 21,285 periods of operating time (less than 0.9% of the total measurement periods during the pilot study) remained above 11 ppmv. The lowest NOx stack exhaust concentration met consistently under all valid conditions was 16 ppmv. Table 3-11 presents a break-down of the number of high NOx outlet events and periods when the NOx outlet concentration at the stack exhaust exceeded 11 ppmv.

**Exempt or Non-Valid Periods.** A total of 7 high NOx outlet events (703 periods or 3.3% of the total engine operating period) were during times when operational issues and system adjustments caused the NOx to exceed 11 ppmv. These events included urea injection system adjustments by the system vendor, operation of the SCR system without urea in the storage tank, modifications to the engine automation system, improper operation of the SCR system, and clogging in the urea injection lance. These periods



were removed from the stack exhaust NO<sub>x</sub> data set because they do not represent proper operating conditions of the SCR system.

During the pilot testing period, 29 high NO<sub>x</sub> outlet events (56 periods or 0.3% of the total engine operating time) were classified as occurring during engine start-up. Rule 1110.2(h)(10) allows for an exemption during engine start-up to allow for sufficient operating temperatures to be reached for proper operation of the emission control equipment. The start-up period is limited to 30 minutes unless a longer period is approved for a specific engine by the Executive Officer and is made a condition of the engine permit. Periods where NO<sub>x</sub> outlet concentrations exceeded 11 ppmv within 30 minutes of engine start-up were removed from the data set for evaluation of the SCR system performance.

**Validated Periods.** A number of the remaining high NO<sub>x</sub> outlet events could be attributed to periods during which the engine was operating with natural gas fuel or at a load that exceeded the range that was originally mapped into the urea injection system. The urea injection system was programmed assuming a fuel blend of 95% digester gas to 5% natural gas. An event was attributed to a rise in natural gas usage if the fuel blend decreased to below 95% digester gas during the same period or during the period immediately preceding the event. A total of 17 high NO<sub>x</sub> outlet events (43 periods or 0.2% of total engine operating time) occurred when the fuel blend decreased to below 95% digester gas. It was observed that the production of NO<sub>x</sub> at the engine exhaust increased as the percentage of natural gas in the engine fuel increased. Therefore, as the digester gas to natural gas fuel ratio decreased to below 95% digester gas (i.e., using more natural gas in the fuel blend), the urea injection system would not inject a sufficient quantity of urea to compensate for the additional NO<sub>x</sub> being produced and NO<sub>x</sub> outlet concentration would increase.

A total of 22 high NO<sub>x</sub> outlet events (63 periods or 0.3% of the total engine operating time) occurred when the engine load exceeded 100%. During the pilot testing period, the urea injection rate setpoints were set for an engine load range of 0% to 100%. An event was considered to be due to an increase in engine load if the engine load increased to above 100% during the same period or during the period immediately preceding the event. When the engine load exceeded 100% of design load for an extended period of time, the urea injection rate was not able to adjust properly because the engine operation surpassed the programming of the system.

There are 22 high NO<sub>x</sub> outlet events (75 periods or 0.4% of the total engine operating time) that could not be attributed to operational issues/system adjustments, engine start-up, increased natural gas fuel usage, or high engine load. The NO<sub>x</sub> outlet concentrations during the majority of these periods typically ranged between 11 and 12 ppmv, with a maximum of 16 ppmv.

The maximum NO<sub>x</sub> concentration at the outlet was 16 ppmv after removing the non-control system related exceedances, including operational issues/system adjustments and engine start-up. The validated average, minimum, and maximum NO<sub>x</sub> outlet concentrations recorded by the CEMS are presented in Table 3-12. The validated data set includes the NO<sub>x</sub> outlet concentration data during increased natural gas fuel usage, high engine load, and other high NO<sub>x</sub> outlet events not attributed to operational issues/system adjustments, engine start-up, increased natural gas fuel usage, or high engine load. Following the pilot test, the urea injection setpoints and biases may be increased to account for increased NO<sub>x</sub> production due to increased natural gas in the fuel blend and higher engine loads. Increasing the urea injection setpoints may also reduce the number of other high NO<sub>x</sub> outlet events that fall just above the 11 ppmv NO<sub>x</sub> limit.

In April 2011, after the official pilot testing period concluded, a Johnson Matthey technician adjusted the urea injection rate curve to 1) expand the curve to a maximum of 125% engine load and 2) to increase the urea injection rate at high engine loads. The increase in urea injection rate should accommodate for the increased NO<sub>x</sub> production when the engine incorporates more natural gas into the fuel blend. Further observation will be required to confirm if these adjustments will lead to a reduction in the number of periods where stack exhaust NO<sub>x</sub> outlet concentration exceeds 11 ppmv.

### 3.3.4. Ammonia Concentration

The SCR system reduces NO<sub>x</sub> through a chemical reaction between ammonia and NO<sub>x</sub>, facilitated by a catalyst to form nitrogen and water vapor. Once urea is injected into the engine exhaust stream, it breaks down into ammonia and other constituents. Hydrolysis of the urea on the face of the catalyst generates more ammonia. While NO<sub>x</sub> reduction is the goal of the SCR system through the consumption of the ammonia, injection of too much urea can result in excess ammonia (total ammonia) at the SCR outlet in the form of free ammonia (NH<sub>3</sub>), and/or other ammonia-formed compounds. Parts of the total ammonia can then participate in secondary reactions with other compounds in the exhaust gas forming by-products, such as ammonium sulfates (combined ammonia). These secondary ammonia by-products may have the undesirable potential to increase maintenance requirements on the equipment downstream from the SCR, due to clogging and particulate buildup. The remaining gaseous ammonia (free ammonia) that is emitted at the stack exhaust is referred to as ammonia slip. SCAQMD regulated the amount of ammonia slip in the Pilot Study Research Permit not to exceed 10 ppmv of free ammonia at the stack exhaust.

Three methods were used for determining ammonia concentration:

- On-site field measurement of free ammonia using Draeger® or Sensidyne® tubes,
- Modified SCAQMD Method 207.1 to measure free ammonia, and



- Estimated total ammonia concentration (free plus combined ammonia) calculation method using inlet and outlet NOx CEMS concentrations and the urea injection rate.

Free ammonia concentration data was collected during source testing at the stack exhaust using modified SCAQMD Method 207.1, and also routinely monitored throughout the pilot testing period using Draeger® tubes or Sensidyne® tubes at the SCR outlet. Both tests provide concentration data for free ammonia. Total ammonia was also calculated from the CEMS data based on the NOx inlet and outlet concentrations and the urea injection rate. The limitations of this total ammonia calculation are discussed in detail in a technical memorandum *OCSO Cat Ox/SCR Pilot Study: Ammonia Sampling and Calculation Methods* (Malcolm Pirnie, May 2011) found in Appendix C-2. As with the NOx data, the ammonia data presented in this section represents data collected during the pilot testing in the period from June 8, 2010 through March 31, 2011, after the urea injection rate set points were adjusted on June 8, 2010. Figure 3-3 presents the maximum total ammonia estimate for each day of the pilot test between these dates using the calculation method.

Over the course of the pilot testing period, the Draeger® tubes consistently measured free ammonia concentrations at the stack exhaust below MDL. During the same time period when the ammonia field measurements were taken, the calculated total ammonia concentration using the 15-minute block averages reported by the CEMS had a value ranging from 0 to 5 ppm of ammonia.

**Estimated Total Ammonia Calculation.** The calculation method for total ammonia is dependent on the NOx inlet and NOx outlet concentrations and the urea injection rate, which is continuously adjusting based on the engine load and the NOx outlet concentration. The ammonia calculation equation is shown below, where CF can be used as a correction factor to account for factors such as secondary reactions and limitations of the urea injection system, and as a tool to adjust the calculation of total ammonia to estimate free ammonia.

$$\text{NH}_3 = [\text{Urea Fed} - (\text{NOx in} - \text{NOx out}) / 2] \times \text{CF}$$

The CF was assumed to be equal to 1 in the present study. Throughout the pilot testing, differences were observed between the free ammonia measured in the field and total ammonia estimated using the calculation method. The calculation method assumes that the ammonia/NOx reaction is the only reaction consuming the urea. There is the potential for ammonia molecules to be consumed in other secondary reactions in the exhaust stream, such as those with sulfur compounds. Sulfur dioxide (SO<sub>2</sub>) and sulfur trioxide (SO<sub>3</sub>) can react with ammonia to produce ammonium sulfate (NH<sub>4</sub>HSO<sub>4</sub>) and ammonia bisulfate (ammonia hydrogen sulfate) ((NH<sub>4</sub>)<sub>2</sub>SO<sub>4</sub>) which can precipitate out of the exhaust gas at low temperatures (300-450°F) as ammonium salts (combined ammonia). Ammonium salts have the potential to deposit on equipment downstream from

the SCR catalyst, such as the heat recovery boiler, reducing their efficiency and increasing maintenance requirements. Field measurements during the pilot test were only performed for free ammonia which did not include ammonia compounds, such as the ammonium salts. Low ammonia concentration Draeger® tube measurements combined with the and high exhaust gas temperatures (~ 800°F) taken directly after the SCR catalyst indicate that the potential for these secondary reactions is low.

Engine load fluctuates with time. When the IC engines are set to a base load, it was observed that the actual engine load fluctuated rapidly by as much as ten percent below the set point. This was found to be typical for the OCS D IC engines. However, since urea injection rate is mapped to engine load, the rapid fluctuations in load can result in rapid changes in urea injection rates. Rapidly changing urea injection rates, instead of steady rates with smooth transitions, can cause inaccuracies in the ammonia calculation.

**SCAQMD Sampling Using Compliance Methods.** Free ammonia was measured at the stack exhaust once during the initial source testing event from April 7-8, 2010, and once after the pilot testing period on May 10, 2011. On both occasions, ammonia slip concentrations at three engine loads measured by Modified SCAQMD Method 207.1 were found to be less than 0.5 ppmv. Neither the Draeger® tube nor Sensidyne® tube free ammonia measurements at the SCR exhaust were above the MDL. However, the total ammonia estimate based on the theoretical calculation using the CEMS data was three to ten times higher than the measured value using the compliance method. Results of these sampling events are compared in Table 3-13.

Further sampling of the exhaust emissions can be performed to establish a value for the correction factor, CF, in the estimated total ammonia calculation method for the calculation of free ammonia. If found, the presence of sulfur dioxide and sulfur trioxide in the exhaust gas before the SCR, and ammonium sulfate and ammonia bisulfate, in the exhaust gas after the SCR, can indicate secondary reactions taking place due to the injection of urea. In addition, inspection of the heat recovery boiler during the next scheduled maintenance may also indicate the presence of ammonium salts in the exhaust gas. A correction factor can be applied to the estimated total ammonia calculation to account for these secondary reactions, thus allowing for the estimation of free ammonia. If ammonium salts are identified in the heat recovery boiler, adjustments to the urea injection rates or additional maintenance of the heat recovery boiler may be required.

Compliance monitoring for free ammonia is more accurate when reflective of gaseous ammonia emitted from the stack, while the estimated total ammonia calculation method may reflect both free ammonia and ammonia by-products produced in the exhaust gas. Although the pilot study data indicates that there is minimal, if any, free ammonia (ammonia slip) due to the SCR system, it is recommended that the OCS D perform

additional and routine testing for ammonia slip during varying loads and fuel blends over a period of time.

### 3.4. Engine Performance

A significant amount of operational data was collected throughout the pilot test. The data logger installed within the urea injection control cabinet collected additional data beyond that collected by the CEMS. These data included the temperature at the catalytic oxidizer inlet and outlet, and the SCR inlet and outlet and the differential pressure across the catalytic oxidizer and SCR catalysts. The system urea injection and back pressure performance proposed by Johnson Matthey is provided in Table 3-14. The data collected by the data logger are summarized in Table 3-15 and were validated to remove periods when the engine was offline. Periods when the engine was offline were identified as those periods when the urea injection is offline, when the temperatures in the catalyst housings cool and the NOx inlet concentration decreases to zero.

During the pilot test, there were no notable back pressure effects on engine performance due to the installation of the Cat Ox/SCR system with a digester gas cleaning system. The engine manufacturer's allowable back pressure is 20 inches of water column (in. wc.). The engineering design estimate of the maximum engine exhaust system back pressure without the Cat Ox/SCR system was 11 in. wc. Therefore, the available system design back pressure for the Cat Ox/SCR system and additional exhaust ductwork was 9 in. wc. Based on the data provided by the data logger in during the pilot test, the average differential pressure through the catalytic oxidizer and SCR are approximately 0.3 and 1.0 in. wc., respectively. Therefore, it is concluded that the system does not negatively affect engine performance.

The exhaust gas temperature reported through the catalytic oxidizer and SCR and the urea injection rate indicate proper system performance. The average inlet and outlet temperature through both catalysts is between 750°F and 800°F, which is in the proper temperature range for ammonia to react in the SCR catalyst. The actual urea injection rate of approximately 0.6 gallons per hour (gph) is also below the urea usage estimate of 1.1 gph proposed by Johnson Matthey.

The DGCS has had a positive effect on engine performance. The use of cleaned digester gas at Plant 2 Engine 3 resulted in much less frequent maintenance requirements for the engine, including longer time intervals between spark plug changes and major maintenance events. OCSO Operations continues to use the DGCS from the 2007 pilot study at Plant 2 Engine 3 after improvements in performance of the engine and maintenance cost savings resulted from use of the DGCS. These savings are discussed further in Section 4.

### 3.5. Summary of System Results

The overall results of the pilot study are:

- The maximum NO<sub>x</sub> concentration at the stack exhaust after the pilot study controls was approximated 16 ppmv, and the average NO<sub>x</sub> concentration was approximately 7.2 ppmv, below the 11 ppmv required under amended Rule 1110.2. Further adjustment of the urea injection rate was performed after the end of the pilot study, and these new data will be evaluated further to determine if this urea injection rate modification will eliminate excursions above 11 ppmv.
- While there were some excursions above 11 ppmv, once these excursions were screened for exempt conditions like start-up, and non-control system error, less than 0.9% of the total measurement periods during the pilot study, or 181 15-minute periods out of 21,285 periods in total remained above 11 ppmv.
- Using monitoring data for gaseous free ammonia collected using the SCAQMD method and Draeger® tube method, the free ammonia concentration was below 0.5 ppmv and MDL over the pilot study, respectively.
- Based on the calculation method for total ammonia, the maximum total ammonia concentration during ammonia concentration sampling events was estimated to be 4.65 ppmv. It is believed that this is an overestimate due to limitations of the calculation, such as not accounting for potential secondary ammonia reactions. Despite this, the estimated total ammonia calculation method can be used as a tool to prompt a field measurement to determine free ammonia (ammonia slip) with the application of an appropriate correction factor, CF. Further evaluation needs to be performed to develop a correction factor that will correlate the calculation method and the measured values of free ammonia.
- The percentage reduction in CO concentration measured across the Cat Ox/SCR system by the portable analyzer ranges consistently exceeded a 96% reduction in CO concentration from the engine exhaust.
- The maximum CO concentration at the stack exhaust using the CEMS data was 42.2 ppmv, well below the amended Rule 1110.2 emission limit of 250 ppmv.
- The catalytic oxidizer was found to result in removing approximately 96 % VOCs from the engine exhaust.
- The maximum VOC concentration at the stack exhaust was found to be 5.42 ppmv using Method 25.3, and consistently well below the 30 ppmv in amended Rule 1110.2.

- The DGCS system, in general, removed siloxanes from the digester gas to below MDL levels and significantly reduced sulfur compounds and VOCs successfully reducing catalyst masking which should lead to extended catalyst life.
- The DGCS system resulted in overall improvements in engine maintenance requirements.
- No back pressure concerns for the engine due to the additional equipment were identified.

**Table 3-1:  
Summary of Fixed Gases in Plant 1 Digester Gas**

Fixed Gas	DGCS Inlet			DGCS Outlet		
	Min.	Max.	Avg.	Min.	Max.	Avg.
	(%)	(%)	(%)	(%)	(%)	(%)
Carbon Dioxide (CO <sub>2</sub> )	25.5	40.1	33.9	23.1	37.2	32.8
Methane (CH <sub>4</sub> )	53.7	62.6	58.7	45.0	62.5	58.0
Nitrogen (N <sub>2</sub> )	0.9	5.1	2.2	1.1	1.9	1.5
Oxygen (O <sub>2</sub> )	0.1	1.4	0.6	0.1	0.8	0.4

**Table 3-2:  
Summary of Reduced Sulfides in Plant 1 Digester Gas**

Compound	DGCS Inlet		
	Min.	Max.	Avg.
	(ppmv)	(ppmv)	(ppmv)
Hydrogen Sulfide	14.7	31.9	26.4
Carbonyl Sulfide	0.01	0.03	0.02
Methyl Mercaptan	0.05	0.08	0.06
Ethyl Mercaptan	0.2	0.3	0.3
Dimethyl Sulfide	0.006	0.02	0.01
Carbon Disulfide	0.004	0.009	0.006
n-Propyl Thiol	0.5	0.8	0.6
iso-Propyl Thiol	0.2	0.4	0.3
Dimethyl Disulfide	ND	ND	ND
Isopropyl Mercaptan	0.3	0.3	0.3
n-Propyl Mercaptan	0.3	0.3	0.3

Note: 1) ND indicates non-detect.

**Table 3-3:  
Summary of Speciated Siloxanes in Plant 1 Digester Gas**

Compound	DGCS Inlet		
	Min.	Max.	Avg.
	(ppbv)	(ppbv)	(ppbv)
Hexamethyldisiloxane (L2)	<MDL	<MDL	<MDL
Hexamethylcyclotrisiloxane (D3)	10	17	12
Octamethyltrisiloxane (L3)	10	19	14
Octamethylcyclotetrasiloxane (D4)	369	1,600	704
Decamethyltetrasiloxane (L4)	73	170	121
Decamethylcyclopentasiloxane (D5)	1,300	14,000	5,371
<b>Total Siloxanes</b>	<b>919</b>	<b>15,700</b>	<b>5,452</b>

Note: MDL is mean detection level.



**Table 3-4:  
Summary of Speciated VOCs in Plant 1 Digester Gas**

Analyte	DGCS Inlet		
	Min.	Max.	Avg.
	(ppbv)	(ppbv)	(ppbv)
Acetone	7.0	88.0	26.0
Benzene	7.3	15.7	10.7
Chlorobenzene	4.5	6.4	5.4
Cyclohexane	4.9	22.0	13.6
1,4-Dichlorobenzene	5.0	28.0	16.4
cis-1,2-Dichloroethene	17.2	103.0	41.4
trans-1,2-Dichloroethene	4.6	4.6	4.6
Ethyl Acetate	22.2	22.2	22.2
Ethylbenzene	37.0	141.0	74.2
4-Ethyltoluene	12.7	68.6	33.7
Freon 11	5.2	6.3	5.8
n-Heptane	57.8	122.0	84.2
Hexane	27.0	210.0	76.5
Methylene Chloride	5.2	14.0	8.9
Methyl Isobutyl Ketone (MIBK)	4.4	4.5	4.4
Propene	2,410	3,730	3,226
Styrene	4.2	24.7	10.7
Tetrachloroethene (PCE)	11.0	11.0	11.0
Tetrachloroethylene	6.0	26.3	13.5
Toluene	1,090	7,300	2,296
1,2,4-Trichlorobenzene	9.2	9.2	9.2
Trichloroethene (TCE)	9.6	28.0	15.8
Trichloroethylene	6.2	22.9	11.7
1,2,4-Trimethylbenzene	67.1	240.0	123.1
1,3,5-Trimethylbenzene	30.0	88.0	45.8
2,2,4-Trimethylpentane	27.0	66.0	52.0
m & p-Xylene	47.0	180.0	96.1
o-Xylene	20.0	64.0	36.3
<b>Total VOCs</b>	<b>1,594</b>	<b>11,133</b>	<b>4,927</b>

**Table 3-5:  
Summary of Siloxane and H<sub>2</sub>S Sampling**

Date of Sampling	Approximate Volume of Gas Treated (million cubic feet)	Total Siloxane		H <sub>2</sub> S			
				SCAQMD 307-91		Draeger Tube	
		Inlet	Outlet	Inlet	Outlet	Inlet	Outlet
		(ppmv)	(ppmv)	(ppmv)	(ppmv)	(ppmv)	(ppmv)
3/16/2010	0.00	3.58	<MDL	N/A	N/A	N/A	N/A
4/7/2010	27.26	8.51	<MDL	N/A	N/A	N/A	N/A
4/21/2010	53.41	N/A	N/A	25.70	ND	26	ND
4/29/2010	68.93	15.70	ND	N/A	N/A	N/A	N/A
5/11/2010	91.86	N/A	N/A	31.70	0.263	31	ND
5/27/2010	122.58	2.67	0.015	N/A	N/A	N/A	N/A
6/8/2010	144.70	N/A	N/A	27.97	2.162	30	2
6/11/2010	146.46	8.49	0.248	N/A	N/A	N/A	N/A
6/12/2010	Carbon media changed.						
6/22/2010	18.44	N/A	N/A	21.62	ND	27	N/A
6/29/2010	32.70	8.69	N/A	N/A	N/A	N/A	N/A
7/7/2010	46.34	N/A	N/A	28.57	ND	25	N/A
7/21/2010	68.89	N/A	N/A	24.87	ND	25	N/A
8/3/2010	90.04	N/A	N/A	27.45	ND	25	N/A
8/12/2010	106.00	N/A	N/A	28.19	ND	26	N/A
8/12/2010	106.00	3.73	ND	N/A	N/A	N/A	N/A
9/1/2010	137.15	4.57	<MDL	N/A	N/A	N/A	N/A
9/1/2010	137.15	N/A	N/A	14.69	ND	14	N/A
9/14/2010	162.45	N/A	N/A	23.01	0.545	23	N/A
9/15/2010	164.63	4.35	<MDL	N/A	N/A	N/A	N/A
9/17/2010	168.63	N/A	N/A	N/A	N/A	N/A	2.5
9/20/2010	173.62	5.73	<MDL	N/A	N/A	N/A	N/A
9/21/2010	Carbon media changed.						
11/4/2010	43.40	5.23	N/A	N/A	N/A	N/A	N/A
1/12/2011	114.53	6.55	N/A	N/A	N/A	N/A	N/A
1/25/2011	137.78	N/A	N/A	28.54	ND	27	N/A
2/9/2011	156.47	N/A	N/A	31.87	1.755	30	N/A
2/9/2011	156.47	4.58	<MDL	N/A	N/A	N/A	N/A
2/14/2011	Carbon media changed.						
2/23/2011	17.72	N/A	N/A	24.46	ND	25	N/A
2/24/2011	20.09	6.64	N/A	N/A	N/A	N/A	N/A

- Notes: 1) All samples are taken using Tedlar® bags, except where otherwise noted as using Draeger® tubes for H<sub>2</sub>S.  
2) Inlet and outlet sample results from 5/19/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.



- 3) Outlet sample results from 6/29/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- 4) Inlet and outlet sample results from AccuLabs on 8/12/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- 5) Sample results from 8/19/10 are not consistent with sample results from other laboratories and are concluded to be erroneous and not included in the minimum, maximum and average.
- 6) N/A indicates that the compound was not analyzed.
- 7) ND indicates non-detect.
- 8) <MDL indicates less than the Method Detection Limit.

**Table 3-6:  
Plant 1 Engine 1 April 7-8, 2010 Testing using SCAQMD Compliance  
Methods**

Parameter	Units	Low Load	Normal Load	High Load	Average Load
Load	KW	1,598	2,303.5	2,515.8	2,139.1
	%	65	90	105	86.7
Volume Flow	dscfm	5,662	8,423	9,244	7,776.3
Fuel Flow	NG scfm	14.2	19.7	20.8	18.2
	DG scfm	470.7	635.3	688.8	598.3
<b>Stack Exhaust</b>					
NOx	ppm	6.5	4.7	8.5	6.6
CO	ppm	7.3	4.9	4.9	5.7
TGMNNEO	ppm	N/A	N/A	2.6	2.6
Formaldehyde	ppm	N/A	N/A	0.434	N/A
Acetaldehyde	ppm	N/A	N/A	0.023	N/A
Acrolein	ppm	N/A	N/A	< MDL	N/A
Ammonia	ppm	0.12	0.18	0.43	0.2
O <sub>2</sub>	%	10.59	11.97	12.03	11.5
CO <sub>2</sub>	%	8.56	7.55	7.69	7.9
<b>Engine Exhaust</b>					
TGMNNEO	ppm	N/A	N/A	25.86	N/A
Formaldehyde	ppm	N/A	N/A	21.44	N/A
Acetaldehyde	ppm	N/A	N/A	0.419	N/A
Acrolein	ppm	0.18	0.18	< MDL	N/A

Notes: 1) N/A indicates not applicable.  
2) <MDL indicates less than the Method Detection Limit.

**Table 3-7:  
SCAQMD Rule 1110.2 Year 2011 Permit Compliance Test Report**

Parameter	Units	Low Load	Normal Load	High Load	Average Load
<b>Engine 1</b>					
Load	KW	1,655	1,929	2,438	2,183.5
	%	66	77	98	87.3
Volume Flow	dscfm	6,194	7,406	9,124	8,265.0
NOx	ppm	4.6	5.4	6.9	6.2
CO	ppm	6.2	7.6	8.2	7.9
TGMNNEO	ppm	N/A	3.2	N/A	N/A
PM	gr/dscf	N/A	0.0	N/A	N/A
O <sub>2</sub>	%	10.90	11.84	12.16	12.00
CO <sub>2</sub>	%	8.59	7.83	7.52	7.68
<b>Engine 2</b>					
Load	KW	1,618	1,852	2,455	2,153.7
	%	65	74	98	86.2
Volume Flow	dscfm	6,513	7,598	9,867	8,732.5
NOx	ppm	27.8	27.6	31.6	29.6
CO	ppm	348.7	390.4	432.3	411.4
TGMNNEO	ppm	N/A	97.2	N/A	N/A
PM	gr/dscf	N/A	0.0010	N/A	N/A
O <sub>2</sub>	%	11.79	12.04	12.53	12.29
CO <sub>2</sub>	%	7.80	7.60	7.16	7.38
<b>Engine 3</b>					
Load	KW	1,748	1,981	2,488	2,234.6
	%	70	79	100	89.4
Volume Flow	dscfm	6,703	7,746	9,652	8,699.0
NOx	ppm	29.1	30.1	31.2	30.7
CO	ppm	317.3	343.8	394.7	369.3
TGMNNEO	ppm	N/A	96.9	N/A	N/A
PM	gr/dscf	N/A	0.0049	N/A	N/A
O <sub>2</sub>	%	11.68	12.01	12.49	12.25
CO <sub>2</sub>	%	7.87	7.57	7.18	

Notes: 1) N/A indicates not applicable

**Table 3-8:  
Summary of CO Concentrations from Inlet and Outlet of Cat Ox/SCR  
System**

Sampling Method	Catalytic Oxidizer Inlet Concentration (ppmvd) <sup>1</sup>			SCR Outlet/Stack Exhaust Concentration (ppmvd) <sup>1</sup>		
	Min.	Max.	Avg.	Min.	Max.	Avg.
Portable Analyzer <sup>2</sup>	367.5	598.7	451.6	<MDL	17.2	5.8
CEMS <sup>3</sup>	N/A <sup>4</sup>	N/A <sup>4</sup>	N/A <sup>4</sup>	4.0	42.2	7.5

- Notes:
- 1) Concentrations are presented in parts per million by volume dry (ppmvd) at 15% O<sub>2</sub>
  - 2) CO concentrations by portable analyzer are measured routinely starting on April 7, 2010, after initial mapping of the SCR system.
  - 3) NOx and CO CEMS data is based on an average of the 15-minute average NOx and CO concentrations for each calendar day.
  - 4) N/A: CEMS measures CO at the stack exhaust only; therefore, there is no CEMS data at the Cat Ox inlet.

**Table 3-9:  
VOC Concentrations at Stack Exhaust**

<b>Date</b>	<b>Stack Exhaust (ppmv)</b>
4/7/2010	2.60
5/11/2010	0.73
8/12/2010	5.42
11/4/2010	4.21
2/24/2011	4.95
Average	3.58

Notes: All concentrations are adjusted to 15% O<sub>2</sub>.

**Table 3-10:  
Summary of NOx Concentrations<sup>1</sup> at Inlet and Outlet of Cat Ox/SCR System**

Sampling Method	Catalytic Oxidizer Inlet Concentration (ppmvd)			Catalytic Oxidizer Outlet Concentration (ppmvd)			SCR Outlet/Stack Exhaust Concentration (ppmvd)			NOx Reduction (%)
	Min.	Max.	Avg.	Min.	Max.	Avg.	Min.	Max.	Avg.	Avg.
SCAQMD Method 100.1 <sup>2</sup>	---	---	---	---	---	---	N/A	N/A	6.6	N/A
Portable Analyzer <sup>3</sup>	37.9	43.5	40.9	36.4	44.0	40.1	6.9	10.2	8.4	79.5
CEMS <sup>4</sup>	19.3	64.7	30.7	---	---	---	0.8	15.9	7.2	77

- Notes:
- 1) Concentrations are presented in parts per million by volume dry (ppmvd) at 15% O<sub>2</sub>.
  - 2) Method 100.1 measurements by SCEC were performed at the stack exhaust only.
  - 3) NOx concentrations by portable analyzer are measured routinely starting on April 7, 2010, after initial mapping of the SCR system.
  - 4) NOx and CO CEMS data is based on an average of the 15-minute average NOx and CO concentrations for each calendar day. CEMS data was not collected at the Cat Ox outlet.
  - 5) N/A indicates not applicable.



**Table 3-11:  
Count of Periods and Events with NOx Concentration Above 11 ppmvd**

Number of 15-minute periods when NOx stack exhaust concentration exceeded 11 ppmvd	Total High NOx Outlet Events <sup>4</sup>	% of Total Operating Time <sup>5</sup>
Operational Issues and System Adjustments <sup>1, 2</sup>	703	7
Engine start-up (30 minutes) <sup>3</sup>	56	29
<b>Total Non-Valid</b>	<b>759</b>	<b>36</b>
Increase in NG Fuel Composition	43	17
High Load (>100%)	63	22
Other	75	22
<b>Total Valid</b>	<b>181</b>	<b>61</b>
<b>Total</b>	<b>940</b>	<b>97</b>

- Notes:
- 1) Operational issues occurred 7/1/10-7/4/10, 12/29/10-1/4/11, 3/14/11, 3/17/11, and 3/22/11.
  - 2) NOx at the stack exhaust exceeded 11 due to system adjustments to the urea injection system.
  - 3) The first 30 minutes after start-up of the engine are exempt from amended Rule 1110.2. Data was excluded where NOx at the stack exhaust exceeded 11 ppmvd during engine start-up.
  - 4) An "event" is defined as one or more consecutive 15-minute periods or periods in close succession where the NOx outlet concentration exceeded 11 ppmvd.
  - 5) The total engine operating time is 21,285 15-minute periods (approximately 5,321 hours).

**Table 3-12:  
Summary of All vs. Validated NOx Inlet and Outlet Concentrations**

Parameter	NOx Engine Exhaust (ppmvd)	All NOx Stack Exhaust (ppmvd)	Validated NOx Stack Exhaust (ppmvd)
Average	30.68	7.53	7.16
Minimum	10.72	0.80	0.80
Maximum	64.70	45.23	15.88
Number NOx Stack Exhaust Periods > 11 ppmvd	N/A	940	181
Percentage of 15-minute periods > 11 ppmvd	N/A	4.4%	0.9%

- Notes:
- 1) Concentrations are presented in parts per million by volume dry (ppmvd) at 15% O<sub>2</sub>.
  - 2) NOx CEMS data is based on the 15-minute average NOx concentrations from June 8, 2010 through March 31, 2011.
  - 3) N/A indicates not applicable

**Table 3-13:  
Ammonia Concentration Sampling Event Summary**

Date	Engine Load (%)	Free NH <sub>3</sub> Field Measurement <sup>1</sup> (ppmv)	Total NH <sub>3</sub> Calculated Value <sup>2</sup> (ppmv)	Free NH <sub>3</sub> SCAQMD Method 207.1 (ppmv)
4/7/2010 & 4/8/2010	65	<MDL	1.66	0.12
	90			0.18
	105			0.43
4/21/2010	110	<MDL	0.09	N/A
4/29/2010	90	<MDL	0.00	N/A
5/6/2010	94	<MDL	2.18	N/A
5/19/2010	100	<MDL	2.54	N/A
6/29/2010	100	<MDL	0.97	N/A
7/28/2010	100	<MDL	0.63	N/A
8/12/2010	95	<MDL	2.50	N/A
11/4/2010	100	<MDL	4.95	N/A
1/12/2011	100	<MDL	0.32	N/A
2/24/2011	100	<MDL	0.09	N/A
5/10/2011	70	<MDL	1.12	0.37
	90		1.60	0.31
	110		3.12	0.38

- Notes:
- 1) Free ammonia field measurements are taken using MDL to 2.5-3 ppm range and 2 to 30 ppm range Draeger® tubes.
  - 2) Total ammonia was determined based on the theoretical calculation which uses NOx inlet and NOx outlet of the catalytic oxidizer/ SCR system and the urea injection rate. The calculated value reported is based on the 15-minute block averages from the CEMS for the time period when the exhaust gas sample was taken for the field measurement. No correction factor was applied.
  - 3) <MDL: below Method Detection Limit.
  - 4) N/A indicates not applicable. No data was taken using Method 207.1 during these field measurement events.

**Table 3-14:  
Catalytic Oxidizer /SCR System Performance Proposal**

Urea usage estimate (32.5% urea solution) @ 80% NOx reduction	1.1 gallons/hour
Estimated pressure drop across catalytic oxidizer using a 4040 arrangement with one layer of standard depth (~ 3.5") catalyst elements @ 200 CPSI = A	0.7 in. wc.
Estimated pressure drop across SCR converter using a 4040 arrangement with two layers of standard depth (~ 3.5") catalyst elements @ 200 CPSI = B	1.4 in. wc.
Estimated pressure drop across 12 foot long mixing duct with one static mixer installed = C	1.9 in. wc.
Total system pressure loss estimate (includes loss through oxidation converter, SCR converter, expansion joint, and mixing duct) using 4040 oxidation catalyst and two layers of 4040 SCR catalyst (A + B + C)	4.0 in. wc.
Estimated pressure drop across one additional layer (~ 3.5") of either catalytic oxidizer or SCR elements that are 200 CPSI	0.7 in. wc.
Additional system pressure drop loss estimate if an additional layer (~ 3.5") of 100 CPSI catalyst in the 4040 housing is employed	0.4 in. wc.
Additional system pressure drop loss estimate if an additional layer (~ 2") of 200 CPSI catalyst in the 4040 housing is employed	0.3 in. wc.

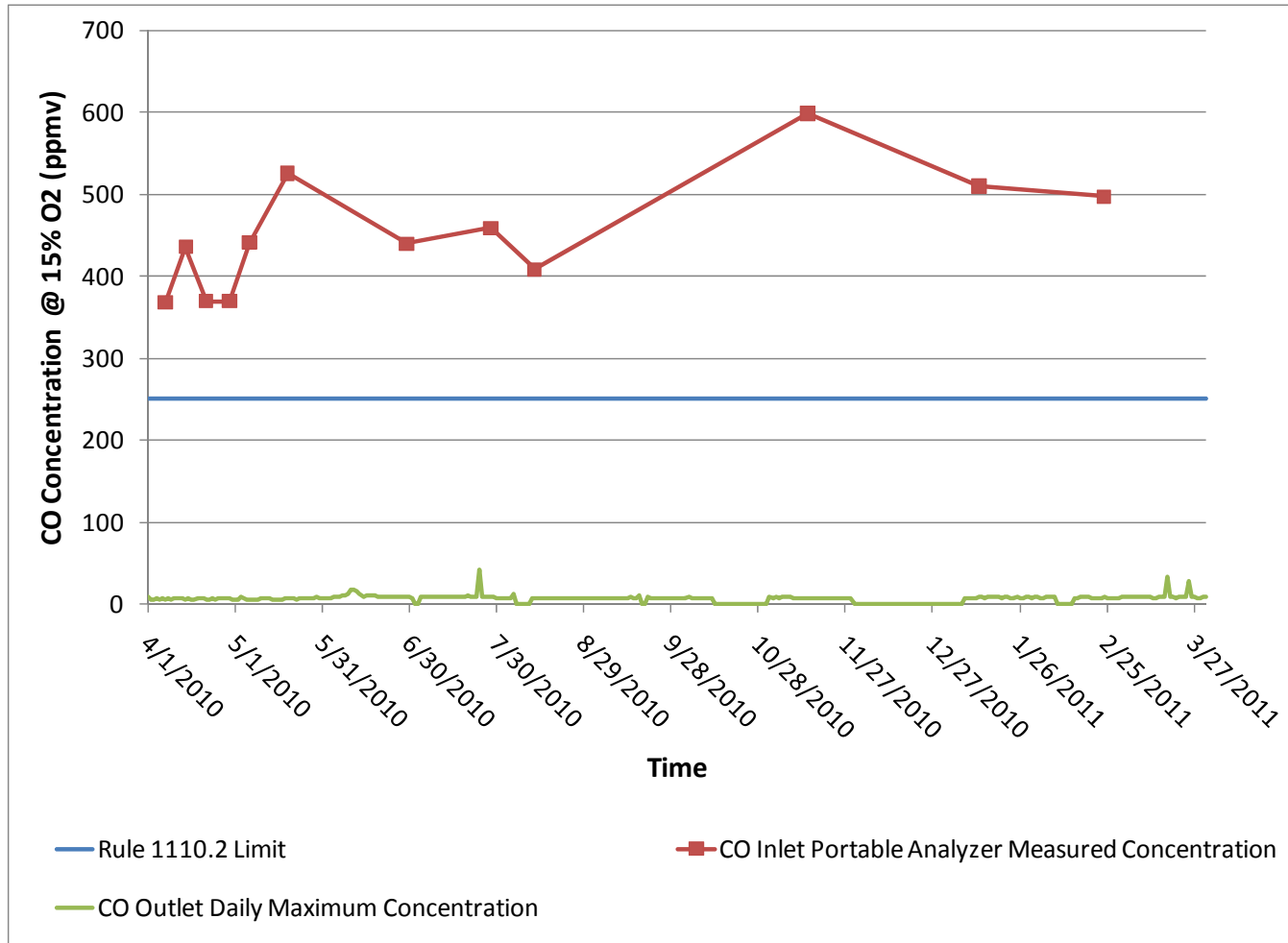
Notes: Estimates provided by Johnson Matthey in their system proposal, dated May 8, 2009.

**Table 3-15:  
Catalytic Oxidizer /SCR System Performance Data**

	Unit	Average Value
Urea Injection Rate	gallon per hour	0.62
Catalytic Oxidizer Inlet Temperature	°F	781
Catalytic Oxidizer Outlet Temperature	°F	779
Catalytic Oxidizer Differential Pressure	in. wc.	0.3
SCR Inlet Temperature	°F	796
SCR Outlet Temperature	°F	756
SCR Differential Pressure	in. wc.	1.0

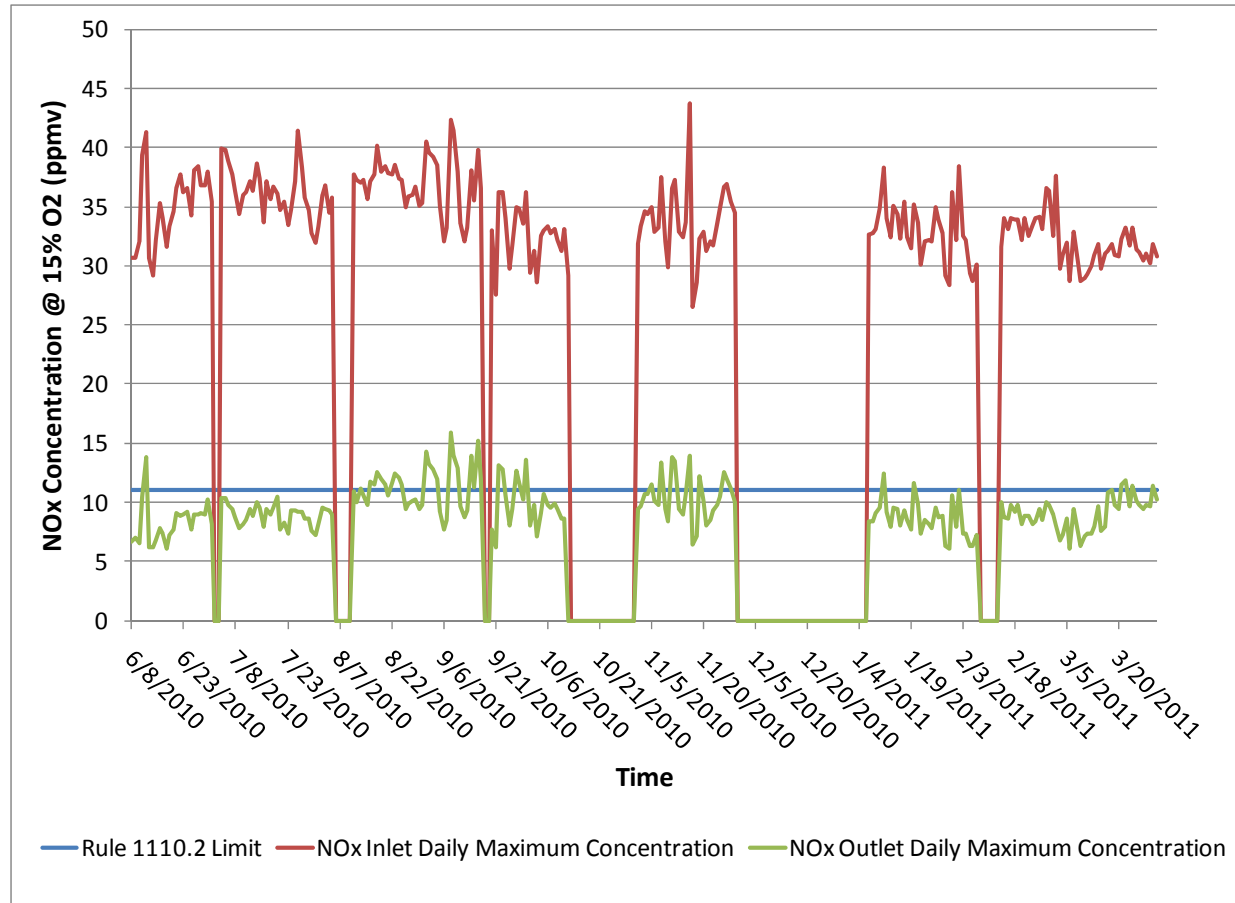
- Notes:
- 1) Estimates are provided by the data logger located inside of the urea injection cabinet for the period of April 1, 2010 through November 4, 2010 and January 1, 2011 through February 24, 2011.
  - 2) The data have been validated to remove periods where the engine was offline, as indicated when urea injection is offline, temperatures in the catalysts cool and NOx inlet value drop.

Figure 3-1: Catalytic Oxidizer Inlet and Outlet CO Concentration



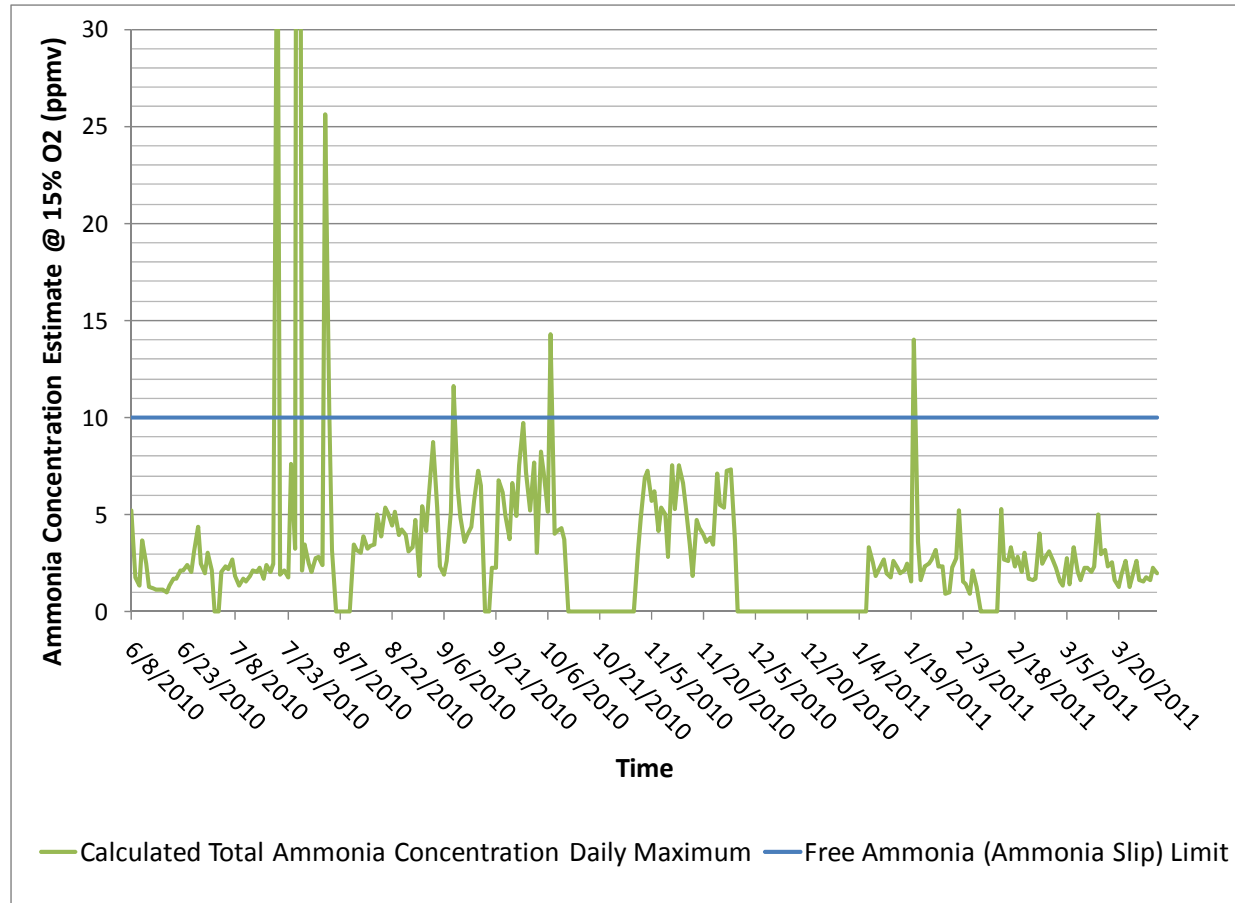
- Notes:
- 1) The first 30 minutes after start-up of the engine are exempt from amended Rule 1110.2. Data was excluded where NOx at the stack exhaust exceeded 11 ppmvd during engine start-up.
  - 2) CEMS values shown are maximum values for each calendar day and may not all occur at the same time as the portable analyzer measurement.
  - 3) Spikes where inlet and outlet NOx concentrations drop to 0 ppmv occur when the engine is offline.

Figure 3-2: Selective Catalytic Reduction Inlet and Outlet NOx Concentration



- Notes:
- 1) The first 30 minutes after start-up of the engine are exempt from amended Rule 1110.2. Data was excluded where NOx at the stack exhaust exceeded 11 ppmvd during engine start-up.
  - 2) Data was excluded where NOx at the stack exhaust exceeded 11 due to system adjustments to the urea injection system.
  - 3) Data was excluded where operational issues occurred from 7/1/10-7/4/10, 12/29/10-1/4/11, 3/14/11, 3/17/11, and 3/22/11.
  - 4) Values shown are maximum values for each calendar day and may not all occur at the same time within the day.
  - 5) Spikes where inlet and outlet NOx concentrations drop to 0 ppmv occur when the engine is offline.

Figure 3-3: Selective Catalytic Reduction Estimated Total Ammonia Concentration



- Notes:
- 1) The first 30 minutes after start-up of the engine are exempt from amended Rule 1110.2. Data were excluded where NO<sub>x</sub> at the stack exhaust exceeded 11 ppmvd during engine start-up.
  - 2) Data were excluded where the SCR system was offline due to system adjustments to the urea injection system.
  - 3) Data were excluded where operational issues occurred from 7/1/10-7/4/10, 12/29/10-1/4/11, 3/14/11, 3/17/11, and 3/22/11.
  - 4) Values shown are maximum 15-minute values for each calendar day.
  - 5) Spikes where inlet and outlet ammonia concentrations drop to 0 ppmv occur when the engine is offline.
  - 6) Ammonia concentration values reported on July 20, 2010 and July 26, 2010 occurred within one hour of an engine shutdown or startup and were not part of the 30-minute exemption from amended Rule 1110.2.



## 4. Cost Effectiveness Analysis

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A cost analysis for the implementation of the DGCS and Cat Ox/SCR systems at Plant 1 Engine 1 was performed. The cost analysis was developed for one digester gas cleaning vessel, with an approximate capacity of 9,900 lbs of carbon media and associated piping, and one Cat Ox/SCR system with platform installation.

### 4.1. Capital and Operation & Maintenance Costs

The capital project budget includes the following construction costs: equipment; installation; mechanical; structural; electrical; site/architectural; instrumentation; and material sales tax; as well as the construction contractor's expenses, such as contractor overhead, profit, mobilization, bonding, and insurance. For capital cost the following assumptions apply:

- The construction cost subtotal is time dated for June 2009 and based on the pilot test construction contract price, including change orders.
- The equipment cost is time dated for June 2009 and based on the pilot test costs of the following equipment: one Cat Ox/SCR system with urea injection control cabinet for Plant 1 Engine 1; one digester gas cleaning vessel with inlet, outlet, and bypass piping sized to treat 100 percent of the digester gas for the Plant 1 cogeneration facility; one NOx probe and umbilical sample line from the Engine 1 exhaust to the CEMS panel in the control room; and seven expansion joints for the engine exhaust ductwork.
- Project design and engineering is assumed to be 15% of the total construction and equipment cost.
- The annualized total capital project budget is based on a 20-year evaluation period and 4.0 percent annualized rate, as set forth in the SCAQMD July 9, 2010 Board Meeting Minutes, Attachment B: Assessment of Available Technology for Control of NOx, CO and VOC Emissions from Biogas-Fueled Engines – Interim Report.

Annual O&M costs associated with operating the digester gas cleaning system and Cat Ox/SCR system includes the following components:

- Annual additional electrical cost;
- Annual carbon media replacement costs;
- Oxidation and SCR catalyst replacement costs;
- Annual urea usage costs;
- Annual equipment maintenance costs;
- Periodic siloxane, VOC, and H<sub>2</sub>S testing;

- The reduction in O&M costs due to the use of clean digester gas was considered. Such reduction in O&M costs includes a reduction in frequency of major maintenance interval service and maintenance shutdowns related to siloxane compounds present in the digester gas.
- The reduction in annual emissions fees for NO<sub>x</sub>, VOC, CO, and formaldehyde based on the estimated emissions reductions realized from the engine exhaust control system was considered.

The assumptions related to the O&M costs are the following:

- Annual operating hours of a single engine at Plant 1 is estimated to be 6,000 hours.
- The change-out of the carbon media for the digester gas cleaning system is estimated to be approximately \$40,000 per change-out. The change-out frequency with three engines operating at Plant 1 at 6,000 annual operating hours is approximately three (3) times per year. The total annual cost of carbon media for three engines at 6,000 annual operating hours is \$120,000 per year. Therefore, the cost for carbon media for a single engine is approximately \$40,000 per year.
- The replacement of the sixteen catalytic oxidizer media blocks and thirty-two SCR catalyst media blocks is estimated to take place once every three years for each engine. Although the Cat Ox/SCR system demonstrated performance for one year during the pilot testing period, it is assumed that the media will perform for three years based on the vendor warranty of 16,000 operating hours. Assuming that each engine operates for 6,000 hour per year, the engine should reach 16,000 operating hours in 2 years and 8 months. The costs of each catalytic oxidizer media block and SCR catalyst media block are \$3,450 and \$1,850, respectively.
- Urea cost is assumed to equal \$4.50 per gallon, including tax, at an average rate of 0.7 gallons per hour for 6,000 annual operating hours.
- Equipment maintenance and testing is assumed to equal \$5,000 per year for annual maintenance of the SCR urea injection system, \$5,400 per year for siloxane testing (\$600 per sample, 3 samples per change out, and 3 change outs per year), and \$3,000 per year for VOC and H<sub>2</sub>S sampling.
- Annual reduced engine maintenance cost using cleaned digester gas, assumed to equal \$130,641 for three engines operating at 6,000 hours annually. Therefore, the approximate savings per engine is approximately \$43,547 per year as estimated by OCSD. Currently, the three engines at Plant 1 are consuming all of the digester gas produced by the facility. Therefore, although the annual cost of maintenance is decreased, the total operating time of each engine will remain the same.
- Calculation of emissions reductions for NO<sub>x</sub>, VOC, and CO is provided in Scenario 2 in Section 4.2 below. Scenario 2 assumed that the uncontrolled NO<sub>x</sub>, VOC, and CO emissions were based on the results from the 2011 Annual Compliance Test for Engines 2 and 3. The controlled emissions were based on the Rule 1110.2 limits of 11 ppmv for NO<sub>x</sub> and 30 ppmv for VOCs, and the pilot testing results of 15 ppmv for CO. Fees per ton of NO<sub>x</sub>, VOC, and CO are assumed to be \$270.26, \$576.75, and

\$3.57, respectively, based on the Annual Emission Report provided by the OCSD dated February 23, 2011.

- The uncontrolled emissions of formaldehyde were based on the results of the 2009 Annual Compliance Test for Engine 3 of 1.4 lb/hr. The controlled emissions of formaldehyde were based on the results of the 2011 Annual Compliance Test for Engine 1 of 0.069 lb/hr. It is assumed that the annual operating hours of a single engine at Plant 1 is 6,000 hours. Therefore, formaldehyde emissions reduction is 4.13 tons per year. The fee per ton of formaldehyde is assumed to be \$800.00 based on the Annual Emission Report provided by the OCSD dated February 23, 2011.
- Annual O&M costs do not include the cost of ammonia sampling because it is assumed that ammonia sampling is part of the annual compliance test. The estimated ammonia sampling cost is \$2,500 for one sampling event per year using SCAQMD Method 207.1. The annual cost of weekly ammonia testing using Draeger® tubes or similar colorimetric tubes is assumed to equal \$300.

The capital cost and annual O&M costs for a single engine is presented in Table 4-1.

## 4.2. Unitized Cost of Carbon Media and Emissions Reduction

The cost of implementation of the DGCS and Cat Ox/SCR systems can be unitized as a cost per cubic foot of digester gas treated or as a cost per ton of NOx and VOC reduced in the emissions. The following summarizes these metrics for evaluating costs.

### 4.2.1. Cost for Volume of Digester Gas Treated

A metric for evaluating the cost of the DGCS is the cost per cubic foot of digester gas treated. This metric is based on the frequency of the carbon media change-out as well as the cost per change-out. The digester gas volume that passed through the catalyst during the pilot test ranged from 146 MMcf to 169 MMcf. The cost of each carbon media change-out is assumed to be approximately \$40,000. Therefore, the cost per treated digester gas ranges between \$237/MMcf and \$274/MMcf. The capacity of the digester gas cleaning vessel is 9,900 pounds of carbon media. Therefore the media per volume of treated digester gas ranges between 59 lbs/MMcf and 68 lbs/MMcf. Note that these are conservative estimates. The pilot test only utilized a single digester gas cleaning vessel as opposed to a lead/lag configuration in which two vessels, a lead vessel followed by a second lag vessel, are used. Therefore, the carbon media was replaced more frequently than necessary to prevent potential breakthrough of siloxane compounds that may foul the catalyst. In a lead/lag configuration, the volume of gas treated between change-outs can be extended since breakthrough can be allowed to occur in the lead vessel because any siloxane compounds would be removed in the lag vessel.

### 4.2.2. Cost for Reductions in NOx and VOCs, and CO Emissions

A metric for evaluating the cost effectiveness of the Cat Ox/SCR system is cost per ton of NOx, VOC, and CO removed by the system. Based on the total annualized cost per

engine, two scenarios for estimating NO<sub>x</sub>, VOC, and CO emissions reduced were developed. The following are the assumed uncontrolled and controlled concentrations for the two scenarios:

### Scenario 1

- Uncontrolled concentrations are based on the current permit limits of 45 ppmv of NO<sub>x</sub>, 209 ppmv of VOCs, and 2,000 ppmv of CO, each at 15% O<sub>2</sub>.
- Controlled emissions are based on the future Rule 1110.2 limits of 11 ppmv of NO<sub>x</sub> and 30 ppmv of VOCs, each at 15% O<sub>2</sub>. Controlled emissions for CO are based on 15 ppmv because the Cat Ox/SCR system consistently reduced CO emissions well below the Rule 1110.2 limit of 250 ppmv. The concentration of 15 ppmv provides a factor of safety of 2 over the average CO concentration of 7.5 ppmv. The factor of safety gives credit for projected emissions reduction, but allows for reduced efficiency as the catalyst approaches the end of its lifecycle, prior to replacement.

### Scenario 2

- Uncontrolled concentrations from the 2011 Annual Source Test Report are 31 ppmv of NO<sub>x</sub>, 97 ppmv of VOCs, and 371 ppmv of CO at 15% O<sub>2</sub> for Plant 1 (Engines 2 and 3).
- Controlled emissions are based on the future Rule 1110.2 limits of 11 ppmv of NO<sub>x</sub> and 30 ppmv of VOCs, each at 15% O<sub>2</sub>. Controlled emissions for CO are based on 15 ppmv because the Cat Ox/SCR system consistently reduced CO emissions well below the Rule 1110.2 limit of 250 ppmv. The concentration of 15 ppmv provides a factor of safety of 2 over the average CO concentration of 7.5 ppmv. The factor of safety gives credit for projected emissions reduction, but allows for reduced efficiency as the catalyst approaches the end of its lifecycle, prior to replacement.

The assumptions used for each scenario were:

- Annual operating hours of a single engine at Plant 1 is estimated to be 6,000 hours;
- Exhaust flowrates are based on high load; and
- VOCs emissions are calculated as methane.

Table 4-2 provides a summary of the cost effectiveness for the two scenarios for one engine at Plant 1. The cost effectiveness in terms of dollars per ton of NO<sub>x</sub> and VOCs reduced for Scenarios 1 and 2 was \$7,987 and \$17,585, respectively. The cost effectiveness in terms of dollars per ton of CO reduced for Scenarios 1 and 2 was \$363 and \$3,546, respectively. Note that the cost effectiveness for CO is conservative since the annualized cost is based on the entire system including the SCR and urea injection system.

**Table 4-1:  
Estimated Capital and O&M Costs for Plant 1 Engine 1**

<b>Capital Cost</b>	<b>Plant 1 Engine 1<sup>1</sup></b>
Equipment (Cat Ox/SCR, DGCV, CEMS, Expansion Joints)	\$708,000
<b>Labor and Contractor Cost<sup>2</sup></b>	
Bonding/Insurance	\$21,272
Mobilization	\$56,748
Prime Contractor Labor and Construction (i.e. concrete & rebar, piping, fittings, valves, installation & start-up, management, etc.)	\$765,723
Steel Subcontractor (i.e. structural steel, miscellaneous metal, handrail, grating)	\$249,941
Insulation Subcontractor	\$82,879
Electrical Subcontractor (i.e. wiring, conduit, grounding, etc.)	\$76,311
Painting Subcontractor	\$28,655
Labor and Contractor Cost Subtotal (including contractor markups for overhead, profit, mobilization, bonding, insurance)	\$1,281,529
Construction Subtotal (June 2009 dollars)	\$1,989,529
Project Design and Engineering (15% of construction subtotal)	\$298,429
<b>Total Capital Cost</b>	<b>\$2,287,958</b>
Annualized Capital Cost (4 % annual rate, 20 years)	\$168,352
<b>Annual O&amp;M Cost for 1 Engine (operating 6,000 hrs/yr)<sup>3</sup></b>	<b>Plant 1 Engine 1</b>
Carbon Media Replacement	\$40,000
Catalyst Replacement	\$38,133
Urea Cost	\$18,900
Electrical Cost	\$1,200
Equipment Maintenance and Testing	\$13,400
Reduced Engine Maintenance	\$(43,547)
Reduced Emission Fees	\$(9,136)
Annual O&M Cost per Engine	\$58,950
<b>Total Annual Capital and O&amp;M Cost for 1 Engine</b>	<b>Plant 1 Engine 1</b>
<b>Total Annualized Cost per Engine</b>	<b>\$227,302</b>

- Notes: 1) Engine Size: 2,500 kW/3,471 bhp  
 2) Subcontractor costs include a 10% prime contractor markup.  
 3) Assumptions for the basis of O&M costs is provided in Section 4.1.

**Table 4-2:  
Cost per Ton NOx and VOC Emissions Reduced at Plant 1 Engine 1**

<b>Capital Cost</b>	<b>Plant 1 Engine 1</b>
Annualized Capital Cost (4 % annual rate, 20 years)	\$168,352
Annual O&M Cost per Engine <sup>1,2</sup>	\$58,950
<b>Total Annualized Cost per Engine</b>	<b>\$227,302</b>
<b>Scenario 1</b>	<b>Plant 1 Engine 1</b>
Uncontrolled NOx – Current Permit Limit (ppmv)	45
Controlled NOx – Future Rule 1110.2 Limit (ppmv)	11
Uncontrolled VOC – Current Permit Limit (ppmv)	209
Controlled VOC – Future Rule 1110.2 Limit (ppmv)	30
Uncontrolled CO – Current Permit Limit (ppmv)	2,000
Controlled CO (ppmv) <sup>3</sup>	15
NOx Reduction (ton/yr)	10.05
VOC Reduction (ton/yr)	18.41
CO Reduction (ton/yr)	357.21
<b>Cost Effectiveness (\$/ton of NOx and VOC reduced)</b>	<b>\$7,987</b>
<b>Cost Effectiveness (\$/ton of CO reduced)</b>	<b>\$636</b>
<b>Scenario 2</b>	<b>Plant 1 Engine 1</b>
Uncontrolled NOx – 2011 Source Testing Data (ppmv)	31
Controlled NOx – Future Rule 1110.2 Limit (ppmv)	11
Uncontrolled VOC (ppmv)	97
Controlled VOC – Future Rule 1110.2 Limit (ppmv)	30
Uncontrolled CO – 2011 Source Testing Data (ppmv)	371
Controlled CO (ppmv) <sup>3</sup>	15
NOx Reduction (ton/yr)	6.03
VOC Reduction (ton/yr)	6.89
CO Reduction (ton/yr)	64.10
<b>Cost Effectiveness (\$/ton of NOx and VOC reduced)<sup>4</sup></b>	<b>\$17,585</b>
<b>Cost Effectiveness (\$/ton of CO reduced)<sup>4</sup></b>	<b>\$3,546</b>

- Notes:
- 1) Engine Size: 2,500 kW/3,471 bhp
  - 2) Annual Operating Hours: 6,000 hours/year
  - 3) Controlled emissions for CO are based on 15 ppmv because the Cat Ox/SCR system consistently reduced CO emissions well below the Rule 1110.2 limit of 250 ppmv. The concentration of 15 ppmv provides a factor of safety of 2 over the average CO concentration of 7.5 ppmv.
  - 4) Cost effectiveness of NOx and VOC reduced and CO reduced are calculated separately. The cost effectiveness of NOx and VOC is equal to the annualized cost per engine divided by the sum of NOx and VOC tons per year reduced. The cost effectiveness of CO is equal to the annualized cost per engine divided by the CO tons per year reduced and does not take NOx or VOC reduction into consideration.



## 5. Conclusions and Recommendations

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In order to evaluate if the amended Rule 1110.2 limits could be met for their digester gas-fired IC engines, OCS D proposed to perform a pilot study on Engine 1 at Plant 1. In previous studies, OCS D had identified a catalytic oxidizer and SCR system along with a DGCS as the most feasible technology to lower air toxic emissions and to meet the new lower emissions limits. Because SCAQMD recognized that the emission limits in the new Rule 1110.2 were “technology-forcing,” they provided a grant to OCS D to support the pilot study at Plant 1 Engine 1 as part of a Rule 1110.2 technology assessment study to determine if cost-effective and commercial technologies are available to comply with the new lower emission limits. The 12-month pilot study at Plant 1 evaluated the effectiveness of the control systems to meet Rule 1110.2 limits.

### 5.1. System Performance

The DGCS system, in general, removed siloxanes from the digester gas to below MDL levels and significantly reduced sulfur compounds and VOCs successfully reducing catalyst masking which should lead to extended catalyst life. Additional benefits of the contaminant removal were significant improvements in engine maintenance requirements, and lower O&M costs. The use of cleaned digester gas resulted in much less frequent maintenance requirements for the engine, including longer time intervals between spark plug changes and major maintenance events.

There were no notable back pressure effects on engine performance due to the installation of the Cat Ox/SCR system with a DGCS during the pilot test. The system design back pressure for the Cat Ox/SCR system and additional exhaust ductwork was estimated to not exceed 9 in. wc. per the engine manufacturer’s recommendations. Based on the data monitored during the pilot test, the average differential pressure through the catalytic oxidizer and SCR systems are approximately 0.3 and 1.0 in. wc, respectively.

The combined Cat Ox/SCR system with digester gas cleaning evaluated in the pilot study resulted in significant reductions in CO, VOC, and NOx emissions from the digester gas fired IC engine at Plant 1 providing substantial air quality benefits from this system. In addition, NOx and CO, along with VOCs (as NMNEOCs) are considered indirect greenhouse gases, affecting tropospheric ozone and methane levels.

### 5.2. Comparison to Rule 1110.2 Limits and Other Criteria

- The average NOx concentration at the stack exhaust after the pilot study Cat Ox/SCR system was approximately 7 ppmv, below the 11 ppmv under amended Rule 1110.2. The lowest NOx stack exhaust concentration met consistently under all valid conditions was 16 ppmv. While there were some periods when the NOx stack exhaust

concentration was above 11 ppmv; after screening these periods to eliminate unusual operational events or start-up conditions, 181 periods out of 21,285 total operating periods (approximately 5,321 hours) remained as valid periods where the NOx stack exhaust concentration was above the new Rule 1110.2 limit. These periods occurred during 61 separate events and accounted for less than 0.9% of the total measurement periods during the pilot study.

- Free ammonia (ammonia slip), the result of excess urea injection in the SCR system, was below 0.5 ppmv using SCAQMD compliance sampling methods and below the MDL using Draeger® tubes over the course of the pilot study. The total ammonia calculation method, unlike the measurement methods for free ammonia, did predict low levels of total ammonia. It was noted that the total ammonia calculation method estimates did not include the use of a project-specific correction factor, CF, which could be used to account for secondary reactions that would consume ammonia, thus bringing the total ammonia calculation method estimates more in line with the measurements of free ammonia.
- The maximum CO concentration at the stack exhaust (42.2 ppmv) was well below the amended Rule 1110.2 emission limit of 250 ppmv.
- The maximum VOC concentration at the stack exhaust (4.95 ppmv) was consistently well below the 30 ppmv in amended Rule 1110.2.

Therefore, with the exception of a relatively limited number of periods when the NOx stack exhaust concentration was above the new amended Rule 1110.2 limit, the combined Cat Ox/SCR system equipped with a DGCS was able to meet the new emission limits.

### 5.3. Cost Effectiveness

The total capital costs to design, procure, and install a digester gas cleaning vessel to clean all the digester gas to the Plant 1 engines, and a Cat Ox/SCR system with auxiliary equipment for Engine 1 is estimated to be \$2,300,000. The annual O&M cost for these systems at Plant 1 is approximately \$59,000. Assuming a 20-year lifespan, the total annualized cost (capital cost plus O&M) for the DGCS and Cat Ox/SCR systems for Plant 1 Engine 1 is \$227,000.

The cost effectiveness analysis (based on dollars per ton of NOx, VOC and CO emissions reduced) was developed for two scenarios: Scenario 1 assumed that the uncontrolled emissions were based on permit limits (i.e., 45 ppmv, 209 ppmv, and 2,000 ppmv, respectively), and Scenario 2 assumed that the uncontrolled emissions were based on the results from the 2011 Annual Compliance Test for Engines 2 and 3. Both scenarios assumed that the controlled emissions were based on the Rule 1110.2 limits of 11 ppmv for NOx, 30 ppmv for VOCs, and the pilot testing results of 15 ppmv for CO. Under these assumptions, the cost effectiveness estimates for Scenarios 1 and 2 are \$7,987 and \$17,585, respectively, per ton of NOx plus VOCs reduced. The cost effectiveness estimates for Scenarios 1 and 2 are \$636 and \$3,546, respectively, per ton of CO reduced.



Note that the cost effectiveness for CO is conservative since the annualized cost is based on the entire system including the SCR and urea injection system. The annualized cost and emissions reduced calculations were based on operating each engine for a maximum of 6,000 hours per year.

## 5.4. Recommendations

SCR systems similar to the Johnson Matthey system used in the present pilot study are commercially available and have successfully demonstrated NO<sub>x</sub> control for single fuels, such as natural gas. However, based on previous source testing data, the NO<sub>x</sub> concentration is higher for natural gas than digester gas at a given load; therefore, there is a potential for variations in NO<sub>x</sub> concentration at the inlet to the SCR system at a given load due to the varying fuel blend in biogas-fueled engines. Since the urea injection rate can only be established based on engine load and not inlet NO<sub>x</sub> concentration, it is difficult to maintain a targeted NO<sub>x</sub> limit at the stack exhaust using this type of SCR system.

NO<sub>x</sub> concentrations in the stack exhaust were above the amended Rule 1110.2 NO<sub>x</sub> limit of 11 ppmv for a small number of sampling periods during the pilot study. These periods where the NO<sub>x</sub> stack exhaust concentration was over 11 ppmv may indicate that this limit is too conservative, especially for biogas-fueled and dual-fueled engines where a steady SCR control efficiency is difficult to maintain. Recommendations regarding the new amended Rule 1110.2 NO<sub>x</sub> limit of 11 ppmv are as follows:

1. Given the variations in the engine load and urea injection rate mapping requirements for the digester gas-fired IC engine, using the 15-minute block average for compliance with the NO<sub>x</sub> emission limit may also be too restrictive, and a longer averaging time may be more appropriate for biogas-fired engines. Alternatively, allowing a limited number of excursions above the 11 ppmv for biogas-fueled engines, for example, 5% of the total annual continuous (i.e., 15-minute averaging periods) NO<sub>x</sub> data, to account for the difficulty in accurately mapping the urea injection rate to control NO<sub>x</sub> outlet concentration, may also be warranted.
2. In April 2011, after the official pilot testing period concluded, a Johnson Matthey technician adjusted the urea injection rate curve to 1) expand the curve to a maximum of 125% engine load and 2) to increase the urea injection rate at high engine loads. The increase in urea injection rate should accommodate for the increased NO<sub>x</sub> production when the engine combusts a fuel blend with a higher percentage of natural gas. Further observation will be required to confirm if these adjustments will lead to a reduction in the number of periods where stack exhaust NO<sub>x</sub> outlet concentration is above 11 ppmv.

Further sampling of the exhaust emissions can be performed to establish a correction factor for the estimated total ammonia calculation method and to confirm that the SCR system does not produce measurable free ammonia. Recommendations regarding the estimated total ammonia calculation method are as follows:

3. The presence of sulfur dioxide and sulfur trioxide in the exhaust gas before the SCR, and ammonium sulfate and ammonia bisulfate in the exhaust gas after the SCR, can indicate secondary reactions between the ammonia and sulfur compounds in the exhaust gases taking place due to the injection of urea. The correction factor, CF, can be used in the estimated total ammonia calculation method to account for these reactions, thus improving this calculation for estimating free ammonia.
4. Although the pilot study data indicates that there is minimal, if any, free ammonia due to the SCR system, it is recommended that the OCSO perform additional and routine testing for free ammonia during varying loads and fuel blends over a period of time to accumulate data corroborating that the SCR system does not produce measurable free ammonia under all operating conditions for a given mapped urea injection versus engine load set point.

**ATTACHMENT C**

**APPENDIX A, B, AND C OF ORANGE COUNTY SANITATION  
DISTRICT FINAL REPORT**

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**APPENDIX A-1:**

**SCAQMD Permit to Construct/Operate  
for an Experimental Research Project**



# South Coast Air Quality Management District



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

October 15, 2009  
A/N 497717

ORANGE COUNTY SANITATION DISTRICT  
10844 Ellis Avenue  
Fountain Valley, CA 92708

Attention: Mike D. Moore  
Manager - Environmental Compliance & Regulatory Affairs

Gentlemen:

## **PERMIT TO CONSTRUCT / OPERATE FOR AN EXPERIMENTAL RESEARCH PROJECT**

The system described below is granted a Permit to Construct and Operate (Application Number 497717) as allowed by and under the conditions set forth by Rule 441 of the Rules and Regulations of the South Coast Air Quality Management District and is subject to the special conditions listed.

### **EQUIPMENT DESCRIPTION:**

DIGESTER GAS FUEL PRETREATMENT, POST-COMBUSTION CATALYTIC OXIDATION AND SELECTIVE CATALYTIC REDUCTION SYSTEMS FOR ENGINE NO. 1 (PO G2957), CONSISTING OF;

1. DIGESTER GAS (DG) CLEANING VESSEL, 7.5' DIA. X 8' H., CONTAINING MINIMUM OF 9,500 LBS OF GRANULAR ACTIVATED CARBON MEDIA, WITH ASSOCIATED DIGESTER GAS SUPPLY AND RETURN LINES, VALVES, TEMPERATURE, DIFFERENTIAL PRESSURE DROP GAUGES, AND CONDENSATE DRIP TRAP.
2. CATALYTIC OXIDIZER (CATOX), JOHNSON MATTHEY INC., HOUSING MODEL NO. 4040-30-36-4, 200 CPSI OXIDATION CATALYST, ALUMINUM SUBSTRATE WITH OTHER METALS, 8' L. X 0' - 4" W. X 8' H., WITH ONE LAYER OF MODULE, 18.67 CUBIC FOOT TOTAL VOLUME, AND WITH ASSOCIATED AUTOMATIC TEMPERATURE AND PRESSURE MONITORING DEVICES AND CONTROLS.
3. SELECTIVE CATALYTIC REDUCTION (SCR) CATALYST, JOHNSON MATTHEY INC., HOUSING MODEL NO. 4040-36-4, ALUMINUM SUBSTRATE WITH OTHER METALS, 8' L. X 0' - 4" W. X 8' H., WITH TWO LAYERS OF MODULE, 37.33 CUBIC FOOT TOTAL VOLUME, AND WITH ASSOCIATED AUTOMATIC TEMPERATURE AND PRESSURE MONITORING DEVICES, AND CONTROL SYSTEMS WITH EXISTING CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS).
4. STORAGE TANK, AQUEOUS UREA SOLUTION (32.5%), 1000 GALLON CAPACITY, WITH ASSOCIATED PIPING, PUMP, FLOW CONTROL VALVES, UREA INJECTION LANCE, COMPRESSED AIR SUPPLY, AND WITH ASSOCIATED AUTOMATIC CONTROLS.

TO BE LOCATED AT: ORANGE COUNTY SANITATION DISTRICT (OCS D)  
WASTEWATER TREATMENT PLANT NO. 1  
10844 ELLIS AVENUE  
FOUNTAIN VALLEY, CA 92708

*Cleaning the air that we breathe...*

**Conditions:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED, UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
4. THIS EXPERIMENTAL RESEARCH PERMIT SHALL EXPIRE ON OCTOBER 31, 2010.
5. SAMPLES SHALL BE COLLECTED FROM THE INLET AND THE OUTLET OF THE DIGESTER FUEL GAS CLEANING (DFGC) SYSTEM AND ANALYZED FOR TOTAL SILICON, SILOXANE AND SILOXANE COMPOUNDS, AND TOTAL SULFUR COMPOUNDS AS H<sub>2</sub>S, USING DISTRICT OR OTHER APPROVED METHODS. RESULTS SHALL BE RECORDED.
6. WHENEVER THE DFGC SYSTEM IS IN OPERATION, THE FUEL GAS FLOW RATE (SCFM) AND TOTAL VOLUME (CUBIC FEET) PROCESSED EACH DAY SHALL BE RECORDED.
7. WHEN CATALYTIC OXIDIZER IS IN OPERATION, THE OXIDIZER'S INLET AND OUTLET TEMPERATURE AND PRESSURE DROP READINGS SHALL BE RECORDED ONCE A SHIFT.
8. WHEN CATALYTIC OXIDIZER IS IN OPERATION, THE CATALYTIC OXIDIZER'S INLET AND OUTLET CO AND VOC CONCENTRATIONS (PPMV) SHALL BE MONITORED, USING A PORTABLE ANALYZER AND AQMD APPROVED TEST METHODS. READINGS SHALL BE RECORDED AT START-UP AND AT LEAST ON A WEEKLY BASIS.
9. WHEN CATALYTIC OXIDIZER IS IN OPERATION, INLET AND OUTLET SAMPLES SHALL BE COLLECTED AND SPECIATED ANALYSIS SHALL BE CONDUCTED FOR TOTAL VOCs (PPMV), INCLUDING BUT NOT LIMITED TO, FOR FORMALDEHYDE AND OTHER TOXIC COMPOUNDS PRESENT (PPMV) USING DISTRICT OR OTHER APPROVED METHODS.
10. WHEN SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM IS IN OPERATION, THE INLET AND OUTLET TEMPERATURE AND PRESSURE DROP READINGS SHALL BE RECORDED ONCE A SHIFT.
11. EXCEPT DURING STARTUP, THE OPERATOR SHALL MAINTAIN THE TEMPERATURE AT THE INLET TO THE CATALYST BEDS BETWEEN 600 AND 850 DEG. F.
12. THE OPERATOR SHALL INSTALL AND MAINTAIN A UREA FLOW RATE MEASURING SYSTEM TO ACCURATELY INDICATE THE UREA INJECTION RATE TO THE SELECTIVE CATALYTIC REDUCTION SYSTEM.

October 15, 2009

13. THE OPERATOR SHALL CONTINUOUSLY ANALYZE THE UREA INJECTION RATE, AND THE SCR INLET AND OUTLET NOX EMISSION RATE TO ESTIMATE THE AMMONIA CONCENTRATION IN THE SCR OUTLET, BASED ON ONE HOUR AVERAGE.
14. WITHIN 90 DAYS OF COMPLETION OF THE RESEARCH EXPERIMENTS, THE ORANGE COUNTY SANITATION DISTRICT SHALL SUBMIT TO AQMD A COMPLETE REPORT WITH EQUIPMENT OPERATING PARAMETERS AND EMISSIONS RESULTS TO;  
ATTENTION: GAURANG RAWAL, REFINERY AND WASTE MANAGEMENT PERMITTING,  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765. THE SUBMITTAL SHALL INCLUDE A COPY OF THIS PERMIT.
15. EMISSIONS FROM THIS EQUIPMENT, AVERAGED OVER 15 MINUTES, CORRECTED TO 15% O2 ON A DRY BASIS, SHALL NOT EXCEED THE FOLLOWING;

POLLUTANT	PPMVD
CO	590
NO <sub>x</sub>	45
VOC	209
NH <sub>3</sub>	<10
PM10	0.0087 GRAINS/DSCF

16. ALL RECORDS SHALL BE KEPT AND MAINTAINED FOR A PERIOD OF AT LEAST TWO YEARS AND SHALL BE MADE AVAILABLE TO AQMD PERSONNEL UPON REQUEST.

It is your responsibility to comply with all laws, ordinances and regulations of other government agencies, which are applicable to this equipment.

If you have any questions, please call Mr. Gaurang Rawal at (909) 396-2543.

Yours truly,



Charles Tupac, P.E.  
A.Q.A.C. Supervisor  
Refinery and Waste Management Permitting

CDT: GCR

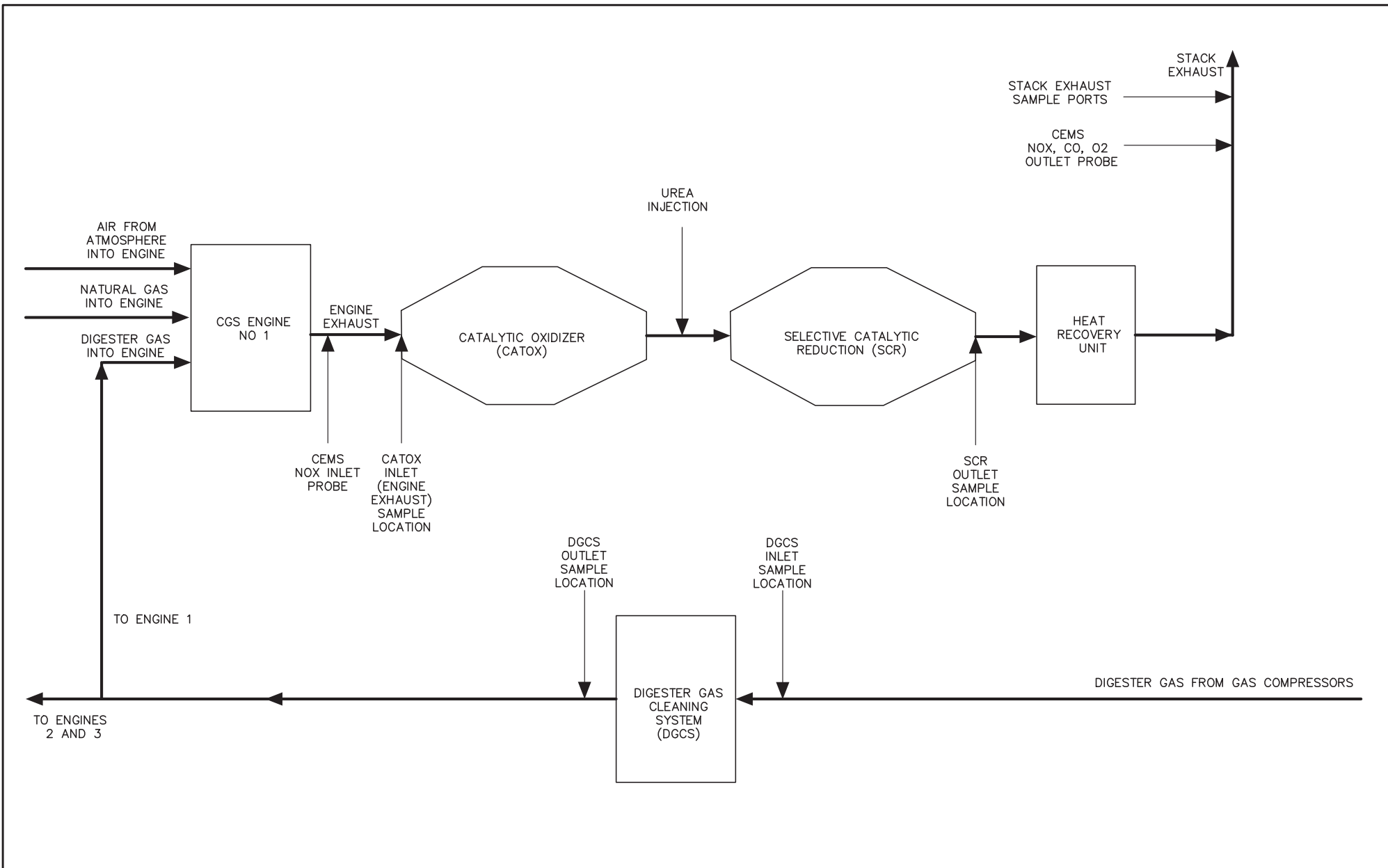
cc: Mohan Nagavedu, AQMD  
A/N 497717 folder

## **APPENDIX A-2:**

### **Schematic of Project Set-up and Process and Instrumentation Diagrams**



XRES:K:\Y:\mha2000\Prinr Standard\Gen\MP1 Title Block - 24 x 36.dwg I:\MSGS:\None  
 User:Sherrin\_Sherwin STANDAID File C:\PDS-187\JLF Report Preparation\Appendix and Figures\A-1 - CGS\_J-79\_SCHMATIC.DWG Scale:1:1 Date:06/10/2011 Time:11:53 Layout:Plan Diagram



REVISIONS			
NO.	BY	DATE	REVISIONS
1	DS	5/17/2010	SAMPLE LOCATIONS

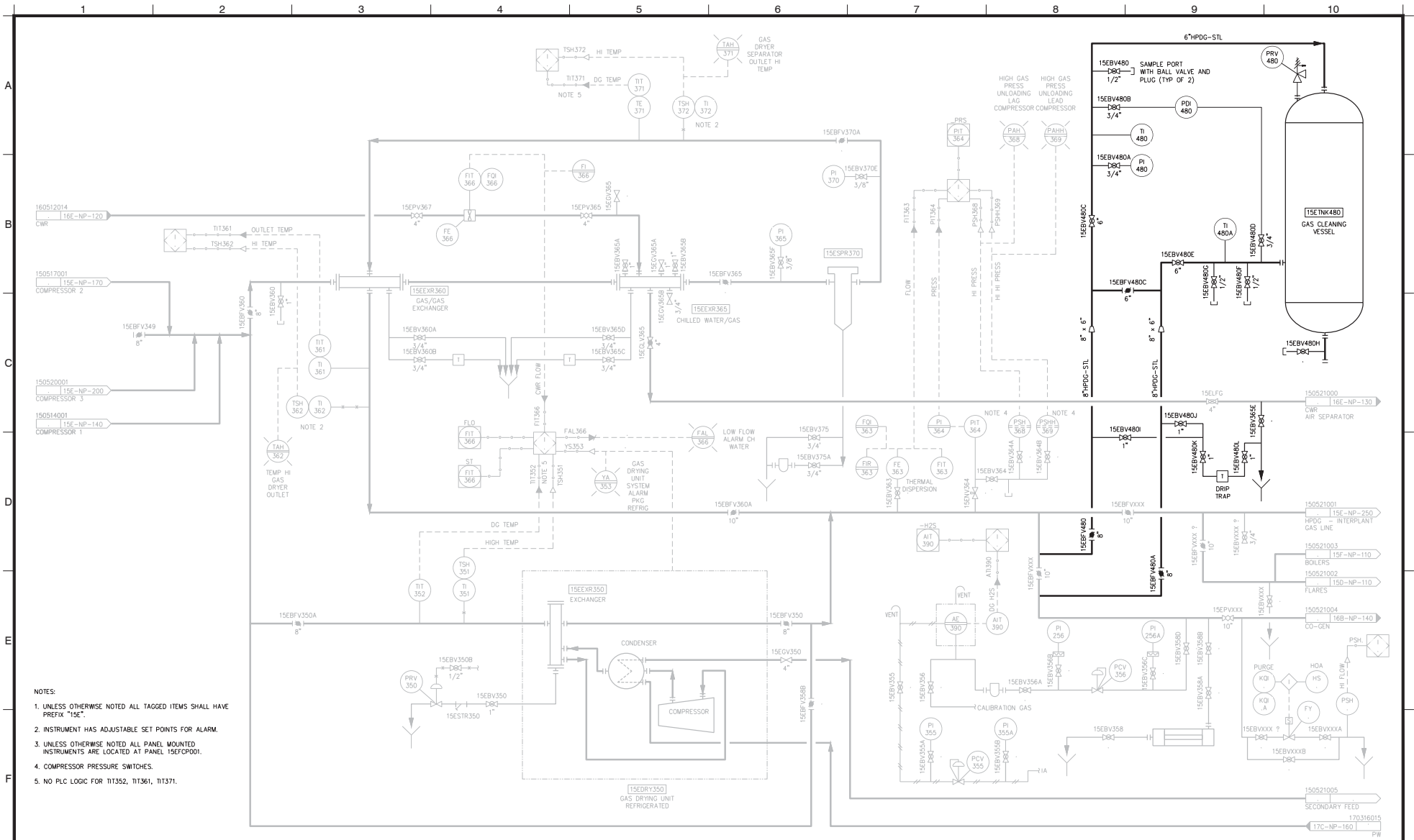
DES — DS  
 DWN — DS  
 CND — KL

ORANGE COUNTY SANITATION DISTRICT  
 J-79 AIR QUALITY IMPROVEMENTS — PLANT NO 1 ENGINE 1  
**PILOT TEST EMISSION CONTROL SYSTEM**

COPYRIGHT ©  
 MALCOLM PIRNIE, INC.  
 DATE — MAY 2011  
 SHEET 1 OF 1  
 CAD REF. NO. \_\_\_\_\_

**SCHEMATIC OF PILOT STUDY SET-UP**

USER: Zomorodi  
 DATE: Mar 23, 2011 9:11am  
 DMC: \\ACAD\PROVA\_1-2010\15E-NP-210-15E-NP-210.dwg  
 PREFERENCES: DCS2-PID-DBR



- NOTES:
1. UNLESS OTHERWISE NOTED ALL TAGGED ITEMS SHALL HAVE PREFIX "15E".
  2. INSTRUMENT HAS ADJUSTABLE SET POINTS FOR ALARM.
  3. UNLESS OTHERWISE NOTED ALL PANEL MOUNTED INSTRUMENTS ARE LOCATED AT PANEL 15EFCP001.
  4. COMPRESSOR PRESSURE SWITCHES.
  5. NO PLC LOGIC FOR TI1352, TI1361, TI1371.

DESIGNED BY: ZOMORODI, S. - 1/11  
 DRAWN BY: RIVAS, A - 1/11  
 CHECKED BY: NIU, E - 1/11  
 LINE IS 2 INCHES AT FULL SIZE (IF NOT 2" - SCALE ACCORDINGLY)

**MALCOLM PIRNIE**



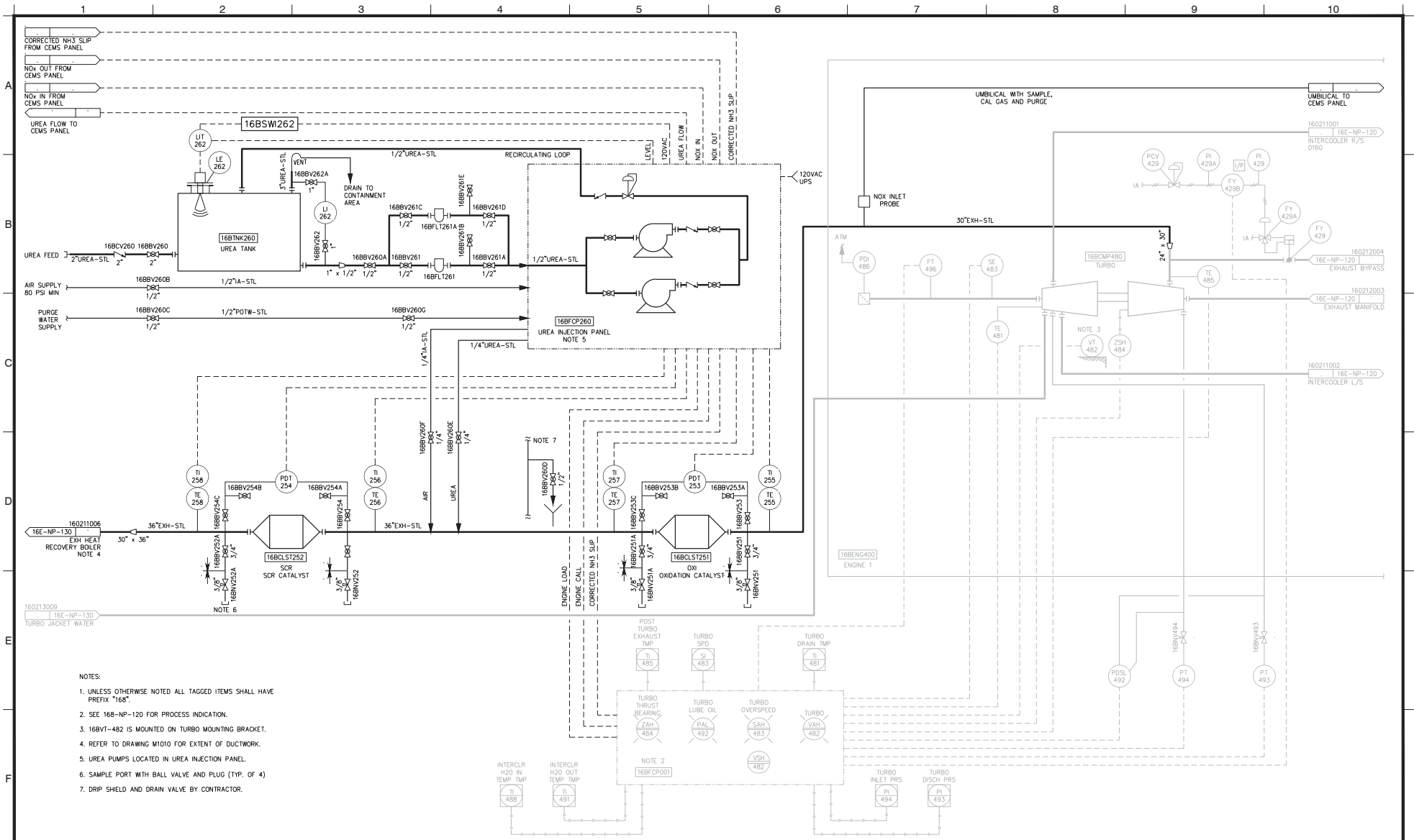
**ORANGE COUNTY SANITATION DISTRICT**

PLANT NO.1-PILOT TEST-SCR/CATALYTIC OXIDIZER AND GAS CLEANING SYSTEMS  
 PROCESS & INSTRUMENTATION DIAGRAM  
 DIGESTER GAS FACILITIES  
 GAS DRYING UNIT

PLC NO. 15GCOMP  
 PROJECT NO. J-79  
 DRAWING NO. 15E-NP-210  
 19 of 20

MARK	DESCRIPTION	DATE	APPR

USER: Zomerod  
 DATE: Mar 23, 2011 9:11am  
 DWS: \\sacv\proj\16B-NP-110-16B-NP-110-110.dwg  
 PLOT DATE: 03/23/2011 9:11am  
 PLOT USER: Zomerod



- NOTES:
- UNLESS OTHERWISE NOTED ALL TAGGED ITEMS SHALL HAVE PREFIX "16B".
  - SEE 16B-NP-120 FOR PROCESS INDICATION.
  - 16BVT-482 IS MOUNTED ON TURBO MOUNTING BRACKET.
  - REFER TO DRAWING M1010 FOR EXTENT OF DUCTWORK.
  - UREA PUMPS LOCATED IN UREA INJECTION PANEL.
  - SAMPLE PORT WITH BALL VALVE AND PLUG (TYP. OF 4)
  - DRIP SHIELD AND DRAIN VALVE BY CONTRACTOR.

DESIGNED BY: ZOMORODI, S. - 1/11  
 DRAWN BY: RIVAS, A. - 1/11  
 CHECKED BY: lost, First - Date  
 LINE IS 2 INCHES AT FULL SIZE (IF NOT 2"-SCALE ACCORDINGLY)

**MALCOLM PIRNIE**



**ORANGE COUNTY SANITATION DISTRICT**

PLANT NO.1-PILOT TEST-SCR/CATALYTIC OXIDIZER AND GAS CLEANING SYSTEMS  
 PROCESS & INSTRUMENTATION DIAGRAM  
 ENGINE AND EXHAUST FLOW WITH SCR/OXI CAT

PLC NO. XX  
 PROJECT NO. J-79  
 DRAWING NO. 16B-NP-110  
 20 of 20

MARK	DESCRIPTION	DATE	APPR

**APPENDIX A-3:**

**Technical Memorandum:  
Comparison of Digester Gas Sampling Method for Speciated Siloxanes**

**Date:** July 13, 2011  
**To:** File  
**From:** Kit Liang, Malcolm Pirnie, WHI; Daniel Stepner, Malcolm Pirnie, WHI  
**Re:** OCSD Cat Ox/SCR Pilot Study: Comparison of Digester Gas Sampling Method for Speciated Siloxanes  
**Project No.:** 0788-187

### **Project Background**

The Orange County Sanitation District (OCSD) requested pilot testing of a catalytic oxidizer/selective catalytic reduction (Cat Ox/SCR) system for controlling air toxics and priority pollutants from the Central Generation Systems (CGS) engines to meet February 2008 South Coast Air Quality Management District (SCAQMD) amendments to Rule 1110.2. The amendments to Rule 1110.2 included changes to the existing limits of 36 ppm to 11 ppm of oxides of nitrogen (NO<sub>x</sub>), 250 ppm to 30 ppm of volatile organic compounds (VOCs), and 2000 to 250 ppm of carbon monoxide (CO) at 15% O<sub>2</sub>. The Cat Ox/SCR system reduces NO<sub>x</sub>, CO and VOC (i.e., formaldehyde, acrolein, etc.) emissions from IC engine exhaust.

The pilot testing project took place at Plant No. 1 on Engine No. 1 and included the installation of a Cat Ox/SCR system on the engine exhaust. This technology has been proven effective for controlling NO<sub>x</sub>, CO, and VOCs from combustion units burning natural gas. However, fouling or rapid performance degradation of the catalytic oxidizers has been an issue for engines burning digester gas. Typically, digester gas fuel contains contaminants such as volatile methyl-siloxanes and sulfurous compounds that tend to foul the catalytic oxidizers. Therefore, Malcolm Pirnie proposed a scope of work for a pilot test to verify the performance of the Cat Ox/SCR system with a digester gas cleaning system (DGCS). Based on the pilot testing performed at Plant No. 2 Engine No. 3 in 2007, the DGCS proved successful in removing contaminants such as siloxanes and hydrogen sulfide from the digester gas such that the catalyst performance is comparable to that of an internal combustion (IC) engine operating on natural gas.

### **Identification of Digester Gas Sampling Methods**

The purpose of the digester gas cleaning system is to remove siloxanes and any potential contaminants, such as hydrogen sulfides in the digester gas, that can potentially foul or reduce the performance of the Cat Ox/SCR system. There are two sampling methods that are commonly used for measuring siloxanes: gas chromatography-mass spectrometry (GC/MS) or wet chemistry method. Digester gas analyzed using GC/MS can be collected using either Tedlar® bags or SUMMA canisters. The wet chemistry method requires samples to be collected using methanol impingers over a two to four hour sampling

period, and then sent to a lab for analysis. After discussions with several certified laboratories, and review of several published papers, samples collected using Tedlar®, SUMMA canister or methanol impingers each has advantages and disadvantages based on the speciated siloxanes in the digester gas. However, collection of the samples using Tedlar® bags provides the most flexibility for minimum sampling time and equipment required.

As part of the Monitoring Test Procedure, the initial performance testing of the gas cleaning system collected samples using Tedlar® bags, SUMMA canister and methanol impinger methods at the digester gas inlet location during the same day and compared the analytical results to determine the most appropriate method for monitoring media breakthrough. The initial performance testing was performed by Malcolm Pirnie, except where noted. The following information was collected for the digester gas cleaning system test:

- Tedlar® bag collection at the DGCS inlet – Malcolm Pirnie collected and sent samples to a certified laboratory to test for speciated siloxanes, speciated VOCs using TO-15, total reduced sulfide using TO-15 and overall gas components and quality (%CH<sub>4</sub>, %CO<sub>2</sub>, %N<sub>2</sub>, heating value) using EPA Method 3C.
- SUMMA canister collection at the DGCS inlet – Malcolm Pirnie collected and sent samples to a certified laboratory to test for speciated siloxanes, speciated VOCs using TO-15, total reduced sulfide using ASTM D-5504, and overall gas components and quality (%CH<sub>4</sub>, %CO<sub>2</sub>, %N<sub>2</sub>, heating value) using ASTM D-1946.
- Wet chemistry method at the DGCS inlet – Engine 1 was operated for five hours at actual operating conditions with the digester gas cleaning system for performance testing. The performance test was performed for a continuous period of at least five hours (1 hour for stabilization and 4 hours for testing). During the test, individual measurements of inlet total siloxane, D4, D5, hexamethyl-disiloxane, octamethyltrisiloxane and any other siloxane compounds identifiable according to the test method was monitored and recorded.

Information obtained from the initial performance testing was used to select the most appropriate sampling method for the determining breakthrough and change-out.

### **Summary of Results**

On March 16, 2010, digester gas was collected at the Plant 1 DGCS using the three sampling methods described above. Table 1 shows a summary of sampling results.

**Table 1**  
**Summary Comparison of Sampling Methods**

<b>OCSD Plant 1</b>	<b>Total Siloxane (ppbv)</b>
Tedlar® – Inlet	3,584
SUMMA Canister – Inlet	546
Methanol Impinger – Inlet	1,457

### **Selection of the Sampling Method**

The primary focus of the digester gas testing is to analyze for siloxane compounds. These compounds are most likely to foul the catalytic oxidizer catalyst. Of the three testing methods, the Tedlar® bag method resulted in the highest concentration of siloxanes. Siloxanes can be lost if a sample degrades. It is believed that the Tedlar® bag method provides a conservative estimate of siloxanes in the gas sample. The Tedlar® bag method also requires the least set-up and sampling time as well as the least equipment required. Although these were not the main criteria for selecting the sampling methods, they are benefits to using this method. When breakthrough of the carbon media is suspected, it is important to take a gas sample quickly to minimize potential fouling of the catalyst or downtime of the engine.

Based on the data presented above, the Tedlar® bag collection method was selected. Tedlar® bags provided the highest reported concentration of siloxanes and also provided the flexibility to test for VOCs and sulfurous compounds.

### **Conclusion**

On March 16, 2010, digester gas was sampled at the inlet of the Plant 1 DGCS using three different methods: Tedlar® bags, SUMMA canisters, and methanol impingers. The gas samples collected using Tedlar® bags and SUMMA canisters were analyzed using GC/MS and the gas sample collected using methanol impingers was analyzed using the wet chemistry method. As shown in the summary of the results in Table 1, the Tedlar® bag sampling method detected the highest level of total siloxane. In addition, the Tedlar® bag sampling method provides the most flexibility of what compounds could be tested for and the minimum sampling time and equipment required. Based on these criteria, the Tedlar® bag method was chosen as the sampling method for future digester gas sampling.

**APPENDIX A-4:**

**Technical Memorandum:  
OCSD Catalytic Oxidizer/SCR Pilot Study:  
SCR Urea Injection Mapping**



Date: July 13, 2011  
To: File  
From: Kit Liang, Malcolm Pirnie, WHI; Daniel Stepner, Malcolm Pirnie, WHI  
Re: OCSD Cat Ox/SCR Pilot Study: Urea Injection Mapping  
Project No.: 0788-187

### **Project Background**

To meet the South Coast Air Quality Management District (SCAQMD) Rule 1110.2 limit for oxides of nitrogen (NO<sub>x</sub>), the Orange County Sanitation District (OCSD) installed a selective catalytic reduction (SCR) system with urea injection was installed in the internal combustion (IC) engine exhaust duct after a catalytic oxidizer (Cat Ox) (both systems supplied by Johnson Matthey) on Engine 1 at Plant 1. Under Amended Rule 1110.2, NO<sub>x</sub> exhaust levels have a lower limit of 11 ppmv for biogas-fueled engines effective July 30, 2011. The SCR system was designed to remove NO<sub>x</sub> through a chemical reaction between the NO<sub>x</sub> in the engine exhaust and ammonia (provided by urea spray injected into the exhaust gas stream upstream of the SCR) on the surface of the SCR catalyst. The urea injection rate is selected (“mapped”) based on engine load and outlet NO<sub>x</sub> concentration (related to the blend of digester gas and natural gas supplement used by the engines at Plant 1). This memorandum outlines the methodology developed to control the urea injection rate.

### **SCR Urea Control System**

The function of the SCR control system is to balance urea injection rate to reduce NO<sub>x</sub> exhaust concentration without emitting excess ammonia in the post-control exhaust gas. The excess ammonia that passes through the SCR catalyst unreacted is, known as “ammonia slip.” Ammonia slip occurs when too much ammonia, or in this case urea, is injected into the exhaust stream, when the temperature of the gas is too low for the ammonia to react, or when the catalyst is degraded. The Research Permit for the pilot study has a maximum allowable ammonia slip of 10 ppm at the stack exhaust. In addition to the unwanted emissions of ammonia from the stack exhaust, excess ammonia in the system can potentially cause damage to the heat recovery boiler and other equipment downstream from the SCR catalyst.

The control system determines the correct rate of urea injection according to the engine load signal, and this urea injection rate versus *engine load map* is programmed into the control system. The load map during the pilot testing period included 16 set points, and was programmed during commissioning by the system vendor, Johnson Matthey. This controller was able to interpolate between the tested load values to generate an overall curve of urea injection rate versus engine load. Thus, as the engine is brought to a load,

and as the engine load changes, the urea flow rate is adjusted by a flow control valve based on the monitored engine load.

In addition to the load map control, the injection system also uses a system of bias set points to more finely control, or “trim”, the urea injection rate. The “NOx curve bias” is a percentage that can be input by the operator to increase or decrease the urea injection rate. This bias is typically set to 0%, but can be modified if engine operation is expected to change the NOx produced in the exhaust emissions. “NOx-add bias” increases the urea injection rate setting (in terms of gallon per hour, gph) based on the NOx outlet concentration recorded by the stack exhaust CEMS analyzer. When the NOx outlet concentration reaches the level set by the control system, the urea injection rate will increase by the selected bias set point. Conversely, “NOx-subtract bias” decreases the urea injection rate in the same manner based on the NOx outlet concentration.

As the engine ran under varying loads during the load mapping procedure, Johnson Matthey measured NOx with a portable chemiluminescent analyzer, and ammonia slip with Draeger® tubes at the SCR catalyst outlet. The purpose of this was to develop a urea injection versus engine load map that met NOx and ammonia slip emissions requirements.

The initial load mapping performed by Johnson Matthey on April 1, 2010 is provided below in Table 1 and in Figure 1. The solid line in Figure 1 represents the set points for urea injection based on engine load. The dashed line represents the urea injection rate with the upper NOx-add bias that increases urea injection based on the NOx outlet emissions. Note that the bias is set for a lower and upper value of NOx outlet concentration. In the case of the April 1, 2010 set points, when the NOx outlet concentration reached the NOx lower add bias concentration (8 ppm), urea injection would increase by an additional 0.50 gph. If the NOx outlet concentration continued to increase and reached the NOx upper add bias concentration (10 ppm), the urea injection would increase by an additional 0.90 gph).

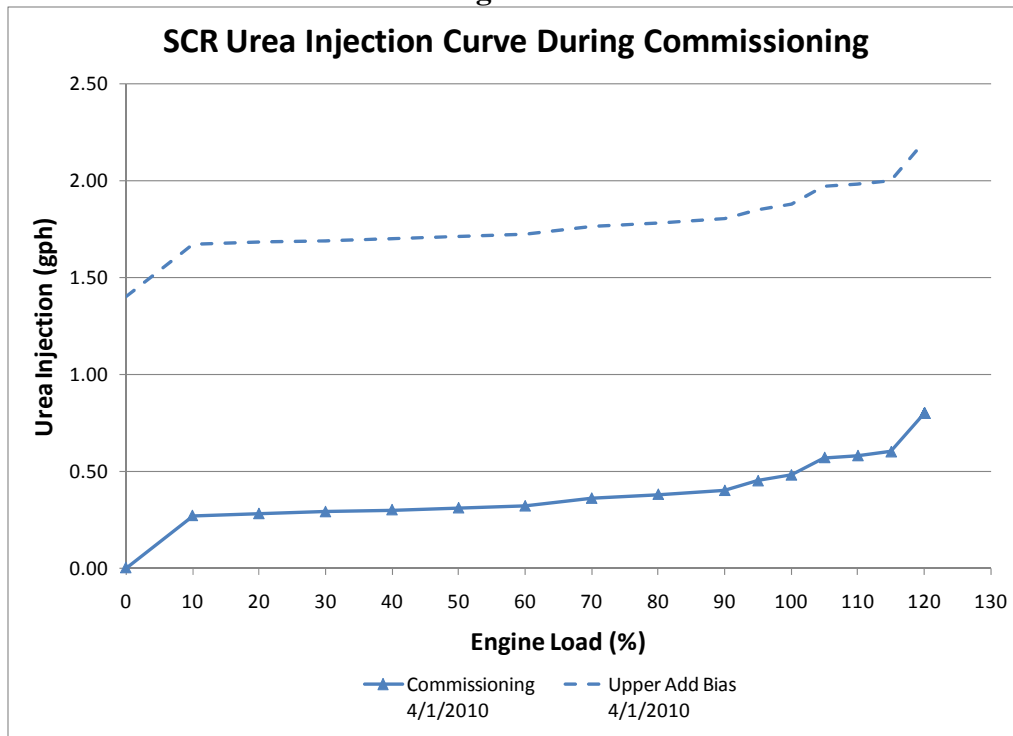
For the pilot testing period, a NOx-subtract bias was not set. A NOx-subtract bias would be used if the OCSO desired to keep the NOx outlet concentration above a threshold level. This could be set if there was a concern that urea would be over injected at low NOx outlet concentrations, causing ammonia slip issues. In the case of the pilot test, there was no desired lower NOx limit and no observed ammonia slip issues.

**Table 1:**

**SCR Urea Injection Set Points at Commissioning (April 1, 2010)**

Set Point	Engine Load (%)	Urea Injection Rate (gph)
1	0	0.00
2	10	0.27
3	20	0.28
4	30	0.29
5	40	0.30
6	50	0.31
7	60	0.32
8	70	0.36
9	80	0.38
10	90	0.40
11	95	0.45
12	100	0.48
13	105	0.57
14	110	0.58
15	115	0.60
16	120	0.80
NOx Bias Set Point	NOx Outlet Concentration (ppmv)	Bias (gph)
NOx curve bias	-	0%
NOx lower add bias	8	0.50
NOx upper add bias	10	0.90
NOx lower subtract bias	0	0.00
NOx upper subtract bias	0	0.00

**Figure 1:**



### **Urea Injection Set Point Adjustments During the Pilot Testing**

During the pilot testing, Johnson Matthey made adjustments to the urea injection set points to refine control of the NO<sub>x</sub> emissions. On May 13, 2010, the urea injection NO<sub>x</sub>-add bias set points were decreased. The original NO<sub>x</sub>-add biases increased the urea injection rates by 0.50 and 0.90 gph when the NO<sub>x</sub> outlet concentrations hit 8 and 10 ppmv, respectively. Based on these set points, when the NO<sub>x</sub> outlet concentration reached the level set for the NO<sub>x</sub>-add bias, it was found that the system injected too much urea, so that the NO<sub>x</sub> outlet concentration was lowered too quickly, resulting in rapid fluctuations in the NO<sub>x</sub> outlet concentration. Therefore, the lower and upper NO<sub>x</sub>-add bias set points were set to 0.05 and 0.09 gph when the NO<sub>x</sub> outlet concentration reached 5 and 7 ppmv, respectively. With lower NO<sub>x</sub>-add bias set points, the maximum amount of urea injected (urea injection rate plus NO lower and upper add bias) was decreased. Therefore, the risk of not injecting enough urea to compensate for the NO<sub>x</sub> outlet concentration was increased. As a precautionary measure, the urea injection rate versus engine load set points were also increased slightly.

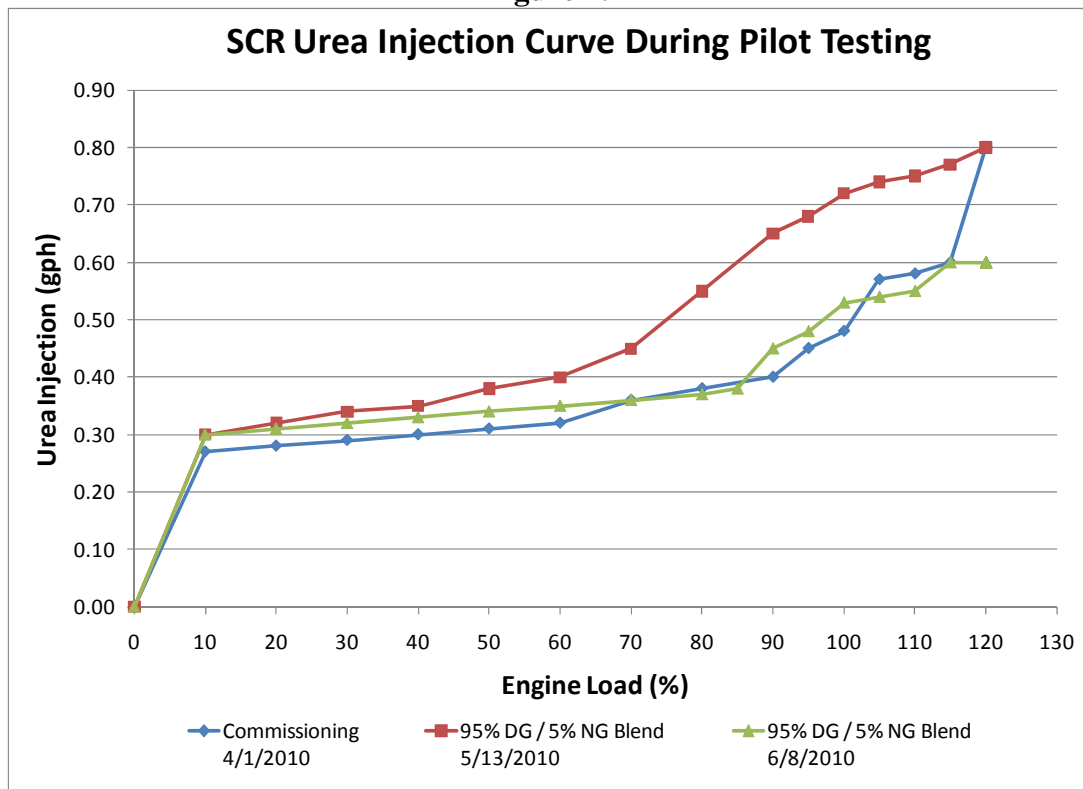
On June 8, 2010, the urea injection set points were readjusted. At the request of OCSD, the urea injection rate versus engine load set points were decreased to reduce possible ammonia slip resulting from over-injection of urea. This was a potential concern because the Plant 1 Engine 1 operates primarily on a greater than 95% digester gas to natural gas fuel ratio. The original set points were set higher to allow for a higher percentage of natural gas in the fuel, which in turn creates a higher NO<sub>x</sub> concentration in the engine exhaust. One additional set point was added at an engine load of 85% to further refine the engine load range. The set points programmed into the SCR control system on June 8, 2010 ran for the remaining pilot testing period through the end of March 2011. The effectiveness of these set points is discussed in the pilot testing report. A summary of the urea injection rate set points through the pilot testing period is provided in Table 2 and Figure 2.

**Table 2:**

**SCR Urea Injection Set Points During the Pilot Testing**

Load/Urea Injection Set Point	Commissioning 4/1/2010		5/13/2010		6/8/2010	
	Engine Load (%)	Urea Injection (gph)	Engine Load (%)	Urea Injection (gph)	Engine Load (%)	Urea Injection (gph)
1	0	0.00	0	0.00	0	0.00
2	10	0.27	10	0.30	10	0.30
3	20	0.28	20	0.32	20	0.31
4	30	0.29	30	0.34	30	0.32
5	40	0.30	40	0.35	40	0.33
6	50	0.31	50	0.38	50	0.34
7	60	0.32	60	0.40	60	0.35
8	70	0.36	70	0.45	70	0.36
9	80	0.38	80	0.55	80	0.37
10	90	0.40	90	0.65	85	0.38
11	95	0.45	95	0.68	90	0.45
12	100	0.48	100	0.72	95	0.48
13	105	0.57	105	0.74	100	0.53
14	110	0.58	110	0.75	105	0.54
15	115	0.60	115	0.77	110	0.55
16	120	0.80	120	0.80	115	0.60
17	-	-	-	-	120	0.60
NOx Bias Set Point	NOx Outlet Concentration (ppmv)	Bias (gph)	NOx Outlet Concentration (ppmv)	Bias (gph)	NOx Outlet Concentration (ppmv)	Bias (gph)
NOx curve bias	-	0%	-	0%	-	0%
NOx lower add bias	8	0.50	5	0.05	5	0.05
NOx upper add bias	10	0.90	7	0.09	7	0.09
NOx lower subtract bias	0	0.00	0	0.00	0	0.00
NOx upper subtract bias	0	0.00	0	0.00	0	0.00

Figure 2:



### Limitations of the Urea Injection Mapping

Based on previous source testing data, the NO<sub>x</sub> concentration in the exhaust gas is higher when combusting natural gas than when combusting digester gas at a given load; therefore, there is a potential for variation in the NO<sub>x</sub> concentration at the inlet to the SCR system at a given load due to the varying fuel blend in biogas-fueled engines. Since the urea injection rate can only be established based on engine load and outlet NO<sub>x</sub> concentration, and not inlet NO<sub>x</sub> concentration, it is difficult to maintain a targeted NO<sub>x</sub> limit at the stack exhaust using this type of SCR system for fuel blend engines..

### Conclusions and Recommendations

The urea injection set points were originally set during system commissioning on April 1, 2010 and were later readjusted on May 13, 2010 to refine NO<sub>x</sub> reduction in the engine exhaust gas. The urea injection set points were readjusted for a final time during the pilot test on June 8, 2010 for analysis of the SCR system.

Attachment:  
Johnson Matthey Commissioning Report, June 1, 2010

# Commissioning Report



Johnson Matthey  
Catalysts

Date: 6/1/2010

Malcolm Pirnie / Orange County Sanitation District  
Oxidation Catalyst and SCR Emission Control System  
System Location: Orange County, CA

Prepared for:  
Daniel Stepner and Kit Liang  
Malcolm Pirnie

Written by:  
Ben Tatum  
Sr. Project Engineer  
Johnson Matthey - Stationary Emission Control (SEC)  
400 Lapp Rd #200  
Malvern, PA 19355

The SCR and Oxidation catalyst system at the Orange County Sanitation District is designed to control NOx, hydrocarbon, and CO emissions from a Cooper Model LSVB-12-SGC engine. The required reduction rates are shown in Table 1: Emissions Data (ppmVD @ 15% O<sub>2</sub>). The reduction rates are guaranteed based on a 15 min average value per South Coast AQMD rule 1110.2.

Table 1: Emissions Data (ppmVD @ 15% O<sub>2</sub>)

Exhaust Component	Catalyst Inlet (max)	Catalyst Outlet (max)*	Reduction Guaranteed
NOx	50 ppm	9 ppm	82.0%
VOC	120 ppm	25 ppm	79.2%
CO	800 ppm	100 ppm	87.5%
HCHO	60 ppm	9 ppm	85.0%
Ammonia Slip	---	10 ppm	---

The SCR system is designed to accommodate changes in the fuel usage of the LSVB-12-SGC engine. The fuel blend can range from 100% natural gas with 0% digester gas to 5% natural gas with 95% digester gas. Four engine load conditions were used for commissioning purposes to determine the necessary urea injection rates. The engine load values chosen were 60%, 80%, 100%, and 110% as this range includes the normal operating conditions of the engine. In addition to varying the engine load, the fuel ratio of natural gas to digester gas was set to one of three conditions to determine the necessary urea injection rates. The fuel ratio testing conditions starting with the most common include 5% natural gas with 95% digester gas, 50% natural gas with 50% digester gas, and 100% natural gas with 0% digester gas. Emission testing was performed for all of the resulting 12 conditions and recorded in Table 2: Emission Testing Results. The results show that the system successfully reduced CO and NOx emissions below the permit conditions while maintaining an NH<sub>3</sub> slip of below 10 ppm.

Table 2: Emission Testing Results

SP	Gas Ratio	OCS D Engine Load %	JM & DL Engine Load %	Valve %	Urea Flow gph	CEMS NOX Corr 15%	Ecom NOX Corr 15%	NH3 Slip	CEMS CO Corr 15%	Ecom CO Corr 15%	Ecom Temp Post SCR	JM Temp Pre SCR	JM Temp Post SCR
	1	50/50	110	100	63	0.63	6.7	8	0.5	8.8	6.9	746	755
2	50/50	100	95	63	0.63	6.7	8	0.5	10	8	759	762	773
3	50/50	80	72.5	58	0.4	3.8	6	0.2	9.4	7	775	800	786
4	50/50	60	59.1	57	0.34	4.4	4	0.1	8.9	7	761	820	796
5	100ng/0d	110	98.1	69	0.91	4.5	7	0	10.9	9	737	752	754
6	100ng/0d	100	92	67	0.76	4.5	6	0	11.4	9	749	757	761
7	100ng/0d	80	73.7	62	0.54	3.4	5	0	11.7	10	766	781	782
8	100ng/0d	60	58.1	58	0.38	3.6	5	0	9.9	8	755	807	784
9	5ng/95d	110	98.8	63	0.58	5.6	5	0	9.7	6	758	756	762
10	5ng/95d	100	95.5	63	0.57	3.1	4	0.1	8.6	7	779	776	787
11	5ng/95d	80	72.2	58	0.38	3.7	5	0	9.1	8	791	811	812
12	5ng/95d	60	60	55	0.33	1.2	1	0.1	9	8	783	830	815



A urea injection map was created based on the results of the testing outlined in Table 2. The urea injection map serves as the base or default urea injection rate at the corresponding engine load, see Table 3 – Load Map. To compensate for changing NOx concentrations due to fuel ratio fluctuations a bias value is added to or subtracted from the base urea set point. If the NOx concentration at the system outlet climbs to 7 ppm or higher an additional 0.05 gph of urea is injected to bring the NOx levels down. If the NOx concentration at the system outlet continues to rise to 9 ppm or higher an additional 0.09 gph of urea will be injected via the additional bias. The resulting amount of urea will be injected upstream of the SCR catalyst to properly control NOx across all fuel ratios.

Table 3: Load Map / Base Urea Set points and Bias

Engine Load %	Urea Set point (gal/min)	Initial High Bias 7 ppm NOx (gal/min)	Additional High Bias 9 ppm NOx (gal/min)	Initial Low Bias x ppm NOx (gal/min)	Additional Low Bias x ppm NOx (gal/min)
0	0	+0.05	+0.09	0	0
10	0.30	+0.05	+0.09	0	0
20	0.31	+0.05	+0.09	0	0
30	0.32	+0.05	+0.09	0	0
40	0.33	+0.05	+0.09	0	0
50	0.34	+0.05	+0.09	0	0
60	0.35	+0.05	+0.09	0	0
70	0.36	+0.05	+0.09	0	0
80	0.37	+0.05	+0.09	0	0
90	0.45	+0.05	+0.09	0	0
95	0.48	+0.05	+0.09	0	0
100	0.53	+0.05	+0.09	0	0
105	0.54	+0.05	+0.09	0	0
110	0.55	+0.05	+0.09	0	0
115	0.60	+0.05	+0.09	0	0
120	0.60	+0.05	+0.09	0	0

The load map urea set points were determined based on the most common operating condition, which is a high concentration of digester gas (approximately 95% digester gas and 5% natural gas). It was determined during testing that adding natural gas to the fuel blend increased the NOx concentration in the exhaust stream. For this reason, the baseline urea set points coincide with the 95% digester gas and 5% natural gas fuel ratio condition which is the most common and requires the least amount of urea injection. The low bias was disabled for this application because the base urea set points correspond to the minimum urea flow requirements.

Some of the challenges of this control system include the 80 second delay between the time the exhaust gas concentrations change the moment the corresponding NOx concentration signal is received from the CEMS. This lagging indication of NOx concentration, which is used by the control system to determine

if additional urea should be injected via the bias, causes an oscillation in the injection rate when the engine is running at high natural gas concentrations. At the lower and more common natural gas concentrations the system is more stable. These oscillations alone are not enough to bring the system out of compliance because the performance is based on a 15 minute average. The system is capable of being tuned to have an acceptable 15 minute average performance over all operating conditions. The second challenge is the fluctuation of the engine load signal. The engine load signal fluctuates very rapidly (a couple times per second) in a range of plus or minus 10%. The urea injection cabinet uses this signal to control the base urea injection set point. This engine load signal fluctuation causes an inherent fluctuation in the base urea injection rate although it is dampened somewhat by a PID loop.

The following is a table including all SCR system set points at the time of commissioning, see Table 4: System Set points. These set points are for informational purposes and should not be changed without the approval of Johnson Matthey.

Table 4: System Set Points

Component Description				
Urea Heat Control system:	JM P&ID Reference	Set Point	Initiates Purge	Description
Control SP	TT-0301	40°F	No	Urea heater activates 5 DegF below this setpoint and de-activates 5 DegF above this setpoint
Temp Low SP	TT-0301	30°F	No	Alarms if this temperature is met indicating Urea heater circuit failure
<b>System Time Delays:</b>				
Air/Water Purge Time Delay	SV-0103	15 sec.	No	Timer for water purge prior to standard air purge
Engine Time Delay	CP-1001	100 sec.	No	Times out any alarms upon startup until system is fully operational
Kick-Start Timer	CV-0501	45 sec.	No	Opens Control Valve CV-0501 to 100% upon injection to fill feed line
Purge Time Delay	FS-1501	45 sec.	No	Timer to initiate redundant pump
Heater SP Time Delay	TT-0301	NA	No	Time delay to initiate urea heater
Fill Rate Time Delay	NA	NA	No	Time delay to initiate transfer pump
Flow Alarm Time Delay	FT-0401	4.5sec.	Yes	Time delay to initiate low flow alarm
<b>System Operation:</b>				
Air Pressure Main	PR-0602	100 psig	No	System air pressure main
Air Pressure Switch SP	PS-1601	30 psig	Yes	System purge and alarms when air pressure drops below this setpoint
Air Pressure to Injection Module	PR-0603	30 psig	No	Injection Module operational pressure
Cat Pre-Temp High AL	TT-0302	900F	No	Alarms if this temperature is met
Injection Temp SP	TT-0302	600F	No	Turns on injection at 10 DegF above this sp and turns off 10 DegF below this setpoint
Load/Urea SP	CP-1001	Startup	No	Load to Urea setpoint set during startup
Low Load SP	ELS-1901	10%	Yes	Urea will not be injected below this load
Load Deadband	ELS-1901	0%	Yes	Urea pump activates 5% above low load setpoint and de-activates 5% below setpoint
Low Tank Level	LT-1201	10%	Yes	Alarms below this setpoint, injection will not occur to prevent dry pump
Low Urea Flow	FT-0401	0.1	Yes	Alarms if urea flow during injection drops below this setpoint
Reagent Supply Pressure	PR-0601	100 psig	No	Urea supply pressure
Stop Air SP	NA	300 sec	No	Injection Module purges for this amount of time after system shuts down.
Urea High PSI SP	PT-0201	160 psig	No	Alarms when urea pressure is above this setpoint
Urea Low Flow SP	FS-1501	0.10 gph	Yes*	Initiates redundant pump when below this setpoint
Urea Low PSI SP	PT-0201	20 psig	No	Alarms when urea pressure is below this setpoint
Post Urea PSI	PT-0202	-	No	This pressure sensor is for monitoring and diagnostical reference only.
CAT Diff PSI		5psig	No	Alarms when the differential pressure across the catalysts exceeds this value.
<b>Load, Urea Setpoints Main:</b>				
Flowmeter Max Scale	FT-0401	3.0 gph	No	Maximum Scale of Urea Flow Transmitter
Air/Water Purge Time Delay	SV-0103	15 sec.	No	Timer for water purge prior to standard air purge
<b>Calibration Screen:</b>				
Engine Load- mA in Max	ELS-1901	20	N/A	Max mA signal received from engine relative to load
Engine Load- mA in Min	ELS-1901	3.98	N/A	Min mA signal received from engine relative to load
Engine Load- Max Scale	ELS-1901	110	N/A	Load that correlates to receiving a 20mA signal
Engine Load- Min Scale	ELS-1901	0	N/A	Load that correlates to receiving a 4mA signal
Urea Scale	FT-0401	99.6	N/A	Utilized for scaling flow transmitter at initial commissioning
Tank Scale Upper	LT-1201	100	N/A	Utilized for scaling level transmitter at initial commissioning
Tank Scale Lower	LT-1201	19.9	N/A	Utilized for scaling level transmitter at initial commissioning
<b>PID Screen:</b>				
Proportional Setting- P	CV-0501	750	N/A	Proportional Setting for CV-0501
Integral Setting- I	CV-0501	0.025	N/A	Integral Setting for CV-0501

SP=Set Point

\* Initiates Purge when second pump does not activate switch

**APPENDIX B-1:**  
**Fixed Gas Sampling Summary**

Fixed Gas Sampling Summary  
Plant 1 - Digester Gas Cleaning System

Collection Date	Lab	Collection Method	Carbon Dioxide		Methane		Nitrogen		Oxygen	
			Inlet	Outlet	Inlet	Outlet	Inlet	Outlet	Inlet	Outlet
			(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)
3/16/2010	Centek	Tedlar Bag	33.4	32.4	55.2	54.9	1.1	1.7	0.3	0.5
4/7/2010	Centek	Tedlar Bag	27.0	27.6	53.7	62.5	1.6	1.7	0.6	0.8
4/29/2010	Centek	Tedlar Bag	28.5	31.4	62.6	59.5	2.0	1.7	0.5	0.5
5/19/2010	Centek (1)	Tedlar Bag	19.1	24.6	44.4	55.3	27.0	13.2	7.1	3.3
5/27/2010	Centek	Tedlar Bag	31.4	31.0	54.0	54.3	4.0	1.1	1.2	0.5
6/11/2010	Centek	Tedlar Bag	25.5	23.1	56.3	45.0	1.4	1.5	0.5	0.5
6/29/2010	Centek (2)	Tedlar Bag	40.1	34.5	58.3	48.4	4.0	16.0	1.1	4.3
8/12/2010	AccuLabs, Inc. (3)	Summa Canister	0.3	0.3	0.5	0.5	77.5	77.9	21.3	20.5
8/12/2010	AtmAA Inc.	Tedlar Bag	36.6	36.4	61.0	60.9	1.0	1.2	0.3	0.3
8/19/2010	AccuLabs, Inc. (4)	Tedlar Bag	31.2	15.7	63.9	32.3	1.9	45.7	0.5	5.4
8/19/2010	AccuLabs, Inc. (4)	Summa Canister	31.7	25.8	65.8	60.4	0.8	10.8	0.1	0.7
9/1/2010	AtmAA Inc.	Tedlar Bag	35.0	35.7	60.4	60.6	2.5	1.9	0.5	0.4
9/15/2010	AtmAA Inc.	Tedlar Bag	36.6	36.6	60.5	60.6	1.3	1.6	0.2	0.3
9/20/2010	AtmAA Inc.	Tedlar Bag	36.2	36.4	60.8	60.7	1.2	1.2	0.3	0.3
11/4/2010	AtmAA Inc.	Tedlar Bag	35.9	N/A	59.9	N/A	2.6	N/A	0.6	N/A
1/12/2011	AtmAA Inc.	Tedlar Bag	34.0	N/A	59.0	N/A	5.1	N/A	1.4	N/A
2/9/2011	AtmAA Inc.	Tedlar Bag	37.7	37.2	60.4	60.7	0.9	1.1	0.1	0.1
2/24/2011	AtmAA Inc.	Tedlar Bag	36.6	N/A	60.1	N/A	1.9	N/A	0.2	N/A
<b>Minimum</b>			<b>25.5</b>	<b>23.1</b>	<b>53.7</b>	<b>45.0</b>	<b>0.9</b>	<b>1.1</b>	<b>0.1</b>	<b>0.1</b>
<b>Maximum</b>			<b>40.1</b>	<b>37.2</b>	<b>62.6</b>	<b>62.5</b>	<b>5.1</b>	<b>1.9</b>	<b>1.4</b>	<b>0.8</b>
<b>Average</b>			<b>33.9</b>	<b>32.8</b>	<b>58.7</b>	<b>58.0</b>	<b>2.2</b>	<b>1.5</b>	<b>0.6</b>	<b>0.4</b>

Notes:

- (1) Inlet and outlet sample results from 5/19/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (2) Outlet sample results from 6/29/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (3) Inlet and outlet sample results from AccuLabs on 8/12/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (4) Sample results from 8/19/10 are not consistent with sample results from other laboratories and are concluded to be erroneous and not included in the minimum, maximum and average.
- (5) N/A indicates not applicable because the compound was not analyzed for.

**APPENDIX B-2:**

**Total Reduced Sulfide Summary**

Total Reduced Sulfide Summary  
Plant 1 - Digester Gas Cleaning System

Collection Date	Lab (1)	Collection Method	Hydrogen Sulfide				Carbonyl Sulfide				Methyl Mercaptan				Ethyl Mercaptan			
			Inlet		Outlet		Inlet		Outlet		Inlet		Outlet		Inlet		Outlet	
			Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)
4/21/2010	OCSD	AQMD 307-91	1,000	25,700	25	ND	6	20	6	ND	12	70	12	ND	19	225	19	ND
5/11/2010	OCSD	AQMD 307-91	2,500	31,700	25	263	6	20	6	8	12	53	12	ND	19	263	19	ND
6/8/2010	OCSD	AQMD 307-91	630	27,970	63	2,162	5	16	5	ND	3	49	3	ND	4	272	4	ND
6/22/2010	OCSD	AQMD 307-91	630	21,620	6	ND	5	14	5	ND	3	54	3	ND	4	301	4	ND
7/7/2010	OCSD	AQMD 307-91	630	28,570	6	ND	5	13	5	ND	3	57	3	ND	4	265	4	ND
7/21/2010	OCSD	AQMD 307-91	630	24,870	6	ND	5	10	5	ND	3	48	3	ND	4	272	4	ND
8/3/2010	OCSD	AQMD 307-91	630	27,450	6	ND	5	19	5	12	3	58	3	ND	4	293	4	ND
8/12/2010	OCSD	AQMD 307-91	630	28,190	6	ND	5	22	5	18	3	72	3	ND	4	304	4	ND
8/12/2010	AccuLabs, Inc. (2)	Summa Canister	5	<MDL	5	<MDL	2	<MDL	2	<MDL	2	<MDL	2	<MDL	2	<MDL	2	<MDL
8/12/2010	AtmAA Inc.	Tedlar Bag	500	30,700	200	<MDL	200	<MDL	200	<MDL	200	<MDL	200	<MDL	200	<MDL	200	<MDL
8/19/2010	AccuLabs, Inc. (3)	Tedlar Bag	100	14,600	10	<MDL	5	13	5	<MDL	20	181	5	<MDL	20	470	5	<MDL
8/19/2010	AccuLabs, Inc. (3)	Summa Canister	100	14,100	10	<MDL	5	13	5	<MDL	20	191	5	<MDL	20	478	5	<MDL
9/1/2010	OCSD	AQMD 307-91	630	14,690	6	ND	5	28	5	15	3	81	3	ND	4	301	4	ND
9/14/2010	OCSD	AQMD 307-91	630	23,010	6	545	5	17	5	17	3	62	3	ND	4	258	4	ND
1/25/2011	OCSD	AQMD 307-91	630	28,540	6	ND	5	28	5	16	3	61	3	ND	4	189	4	ND
2/9/2011	OCSD	AQMD 307-91	630	31,870	6	1,755	5	21	5	18	3	79	3	ND	4	210	4	ND
2/23/2011	OCSD	AQMD 307-91	630	24,460	6	ND	5	15	5	ND	3	58	3	ND	4	205	4	ND
	<b>Minimum</b>		<b>N/A</b>	<b>14,690</b>	<b>N/A</b>	<b>263</b>	<b>N/A</b>	<b>10</b>	<b>N/A</b>	<b>8</b>	<b>N/A</b>	<b>48</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>189</b>	<b>N/A</b>	<b>ND</b>
	<b>Maximum</b>		<b>N/A</b>	<b>31,870</b>	<b>N/A</b>	<b>2,162</b>	<b>N/A</b>	<b>28</b>	<b>N/A</b>	<b>18</b>	<b>N/A</b>	<b>81</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>304</b>	<b>N/A</b>	<b>ND</b>
	<b>Average</b>		<b>N/A</b>	<b>26,381</b>	<b>N/A</b>	<b>1,181</b>	<b>N/A</b>	<b>19</b>	<b>N/A</b>	<b>15</b>	<b>N/A</b>	<b>62</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>258</b>	<b>N/A</b>	<b>ND</b>

Notes:

- (1) Hydrogen sulfide results from Centek are above the operating range of the instrument and appear to be erroneous. Centek sample results are not included in the analysis of this pilot testing program.
- (2) Inlet and outlet sample results from AccuLabs on 8/12/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (3) Sample results from 8/19/10 are not consistent with sample results from other laboratories and are concluded to be erroneous and not included in the minimum, maximum and average.
- (4) N/A indicates not applicable or that the compound was not analyzed for.
- (5) ND indicates non-detect.
- (6) <MDL indicates that the result, if any, was less than the method detection limit.

Total Reduced Sulfide Summary  
Plant 1 - Digester Gas Cleaning System

Collection Date	Lab (1)	Collection Method	Dimethyl Sulfide				Carbon Disulfide				n-Propyl Thiol				iso-Propyl Thiol			
			Inlet		Outlet		Inlet		Outlet		Inlet		Outlet		Inlet		Outlet	
			Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)
4/21/2010	OCSD	AQMD 307-91	18	ND	18	ND	13	ND	13	ND	21	584	21	ND	30	310	30	ND
5/11/2010	OCSD	AQMD 307-91	18	ND	18	ND	13	ND	13	ND	21	630	21	ND	30	360	30	ND
6/8/2010	OCSD	AQMD 307-91	5	8	5	10	3	4	3	3	320	536	3	ND	3	341	3	4
6/22/2010	OCSD	AQMD 307-91	5	6	5	ND	3	ND	3	ND	3	679	3	ND	3	406	3	ND
7/7/2010	OCSD	AQMD 307-91	5	12	5	ND	3	ND	3	ND	3	625	3	ND	3	381	3	ND
7/21/2010	OCSD	AQMD 307-91	5	8	5	12	3	ND	3	4	3	593	3	ND	3	373	3	ND
8/3/2010	OCSD	AQMD 307-91	5	13	5	12	3	ND	3	6	3	622	3	ND	3	401	3	ND
8/12/2010	OCSD	AQMD 307-91	5	17	5	20	3	ND	3	7	3	649	3	ND	3	416	3	ND
8/12/2010	AccuLabs, Inc. (2)	Summa Canister	2	15	2	11	2	5	2	4	2	<MDL	2	<MDL	2	<MDL	2	<MDL
8/12/2010	AtmAA Inc.	Tedlar Bag	200	<MDL	200	<MDL	200	<MDL	200	<MDL	320	<MDL	200	<MDL	250	<MDL	200	<MDL
8/19/2010	AccuLabs, Inc. (3)	Tedlar Bag	5	10	5	8	5	<MDL	5	<MDL	50	1,180	5	<MDL	5	<MDL	5	<MDL
8/19/2010	AccuLabs, Inc. (3)	Summa Canister	5	10	5	9	5	<MDL	5	2	50	1,190	5	<MDL	5	<MDL	5	<MDL
9/1/2010	OCSD	AQMD 307-91	5	13	5	18	3	9	3	12	3	565	3	ND	3	416	3	ND
9/14/2010	OCSD	AQMD 307-91	5	15	5	18	3	ND	3	7	3	631	3	ND	3	341	3	ND
1/25/2011	OCSD	AQMD 307-91	5	8	5	11	3	5	3	8	3	454	3	ND	3	214	3	ND
2/9/2011	OCSD	AQMD 307-91	5	14	5	ND	3	ND	3	6	3	514	3	ND	3	242	3	ND
2/23/2011	OCSD	AQMD 307-91	5	13	5	ND	3	ND	3	ND	3	476	3	ND	3	268	3	ND
<b>Minimum</b>			N/A	6	N/A	10	N/A	4	N/A	3	N/A	454	N/A	ND	N/A	214	N/A	4
<b>Maximum</b>			N/A	17	N/A	20	N/A	9	N/A	12	N/A	679	N/A	ND	N/A	416	N/A	4
<b>Average</b>			N/A	12	N/A	14	N/A	6	N/A	7	N/A	581	N/A	ND	N/A	344	N/A	4

Total Reduced Sulfide Summary  
Plant 1 - Digester Gas Cleaning System

Collection Date	Lab (1)	Collection Method	Dimethyl Disulfide				Isopropyl Mercaptan				n-Propyl Mercaptan			
			Inlet		Outlet		Inlet		Outlet		Inlet		Outlet	
			Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)
4/21/2010	OCSD	AQMD 307-91	30	ND	30	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5/11/2010	OCSD	AQMD 307-91	30	ND	30	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6/8/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6/22/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7/7/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7/21/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8/3/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8/12/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8/12/2010	AccuLabs, Inc. (2)	Summa Canister	5	<MDL	5	<MDL	5	<2	5	<2	5	<2	5	<2
8/12/2010	AtmAA Inc.	Tedlar Bag	200	<MDL	200	<MDL	0.2	250	0.2	<MDL	0.2	320	0.2	<MDL
8/19/2010	AccuLabs, Inc. (3)	Tedlar Bag	5	<MDL	5	<MDL	5	<2	5	<2	50	1,180	5	<2
8/19/2010	AccuLabs, Inc. (3)	Summa Canister	5	<MDL	5	<MDL	5	<2	5	<2	50	1,190	5	<2
9/1/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9/14/2010	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1/25/2011	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2/9/2011	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2/23/2011	OCSD	AQMD 307-91	4	ND	4	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Minimum</b>			<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>250</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>320</b>	<b>N/A</b>	<b>ND</b>
<b>Maximum</b>			<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>250</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>320</b>	<b>N/A</b>	<b>ND</b>
<b>Average</b>			<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>250</b>	<b>N/A</b>	<b>ND</b>	<b>N/A</b>	<b>320</b>	<b>N/A</b>	<b>ND</b>



**APPENDIX B-3:**

**Speciated Siloxane Sampling Detailed Summary**

Siloxane Sampling Summary  
Plant 1 - Digester Gas Cleaning System

Collection Date	Lab	Collection Method	Hexamethyldisiloxane (L2)				Hexamethylcyclotrisiloxane (D3)				Octamethyltrisiloxane (L3)				Octamethylcyclotetrasiloxane (D4)			
			Inlet		Outlet		Inlet		Outlet		Inlet		Outlet		Inlet		Outlet	
			Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)
3/16/2010	Centek	Tedlar Bag	20	ND	20	ND	20	10	20	ND	20	12	20	ND	20	600	20	ND
4/7/2010	Centek	Tedlar Bag	20	ND	10	ND	20	9.7	10	ND	20	11	10	ND	20	840	10	ND
4/29/2010	Centek	Tedlar Bag	50	ND	10	ND	50	ND	10	ND	50	10	10	ND	50	1600	10	ND
5/19/2010	Centek (1)	Tedlar Bag	20	ND	10	ND	20	15	10	ND	20	17	10	ND	20	810	10	7.6
5/27/2010	Centek	Tedlar Bag	20	ND	10	8.4	20	13	10	ND	20	17	10	0.1	20	1300	10	5.2
5/27/2010	Centek	Methanol Impinger	20	N/A	10	ND	20	N/A	10	ND	20	N/A	10	ND	20	369	10	ND
6/11/2010	Centek	Tedlar Bag	20	ND	10	7.4	20	12	10	12	20	15	10	ND	20	660	10	200
6/29/2010	Centek (2)	Tedlar Bag	20	ND	10	ND	20	17	10	ND	20	19	10	ND	20	620	10	ND
8/12/2010	AccuLabs (3)	Summa Canister	0.025	3.12	0.025	2.98	0.025	<0.01	0.025	<0.01	0.025	<0.01	0.025	<0.01	0.025	<0.01	0.025	<0.01
8/12/2010	AtmAA	Tedlar Bag	N/A	ND	N/A	ND	N/A	ND	N/A	ND	N/A	ND	N/A	ND	N/A	471	N/A	ND
8/19/2010	AccuLabs (4)	Tedlar Bag	0.025	1.61	0.025	0.26	0.025	4.84	0.025	0.03	0.025	4.97	0.025	ND	0.025	41.5	0.025	0.03
8/19/2010	AccuLabs (4)	Summa Canister	0.025	1.34	0.025	0.23	0.025	5.62	0.025	0.03	0.025	5.84	0.025	ND	0.025	43.1	0.025	0.03
9/1/2010	AtmAA	Tedlar Bag	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	510	60	<MDL
9/15/2010	AtmAA	Tedlar Bag	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	860	60	<MDL
9/20/2010	AtmAA	Tedlar Bag	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	864	60	<MDL
11/4/2010	AtmAA	Tedlar Bag	60	<MDL	N/A	N/A	60	<MDL	N/A	N/A	60	<MDL	N/A	N/A	60	597	N/A	N/A
1/12/2011	AtmAA	Tedlar Bag	60	<MDL	N/A	N/A	60	<MDL	N/A	N/A	60	<MDL	N/A	N/A	60	409	N/A	N/A
2/9/2011	AtmAA	Tedlar Bag	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	<MDL	60	420	60	<MDL
2/24/2011	AtmAA	Tedlar Bag	60	<MDL	N/A	N/A	60	<MDL	N/A	N/A	60	<MDL	N/A	N/A	60	438	N/A	N/A
<b>Minimum</b>			<b>N/A</b>	<b>&lt;MDL</b>	<b>N/A</b>	<b>7.4</b>	<b>N/A</b>	<b>9.7</b>	<b>N/A</b>	<b>12.0</b>	<b>N/A</b>	<b>10.0</b>	<b>N/A</b>	<b>0.1</b>	<b>N/A</b>	<b>369</b>	<b>N/A</b>	<b>5.2</b>
<b>Maximum</b>			<b>N/A</b>	<b>&lt;MDL</b>	<b>N/A</b>	<b>8.4</b>	<b>N/A</b>	<b>17.0</b>	<b>N/A</b>	<b>12.0</b>	<b>N/A</b>	<b>19.0</b>	<b>N/A</b>	<b>0.1</b>	<b>N/A</b>	<b>1,600</b>	<b>N/A</b>	<b>200.0</b>
<b>Average</b>			<b>N/A</b>	<b>&lt;MDL</b>	<b>N/A</b>	<b>7.9</b>	<b>N/A</b>	<b>12.3</b>	<b>N/A</b>	<b>12.0</b>	<b>N/A</b>	<b>14.0</b>	<b>N/A</b>	<b>0.1</b>	<b>N/A</b>	<b>704</b>	<b>N/A</b>	<b>102.6</b>

**Notes:**

- (1) Inlet and outlet sample results from 5/19/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (2) Outlet sample results from 6/29/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (3) Inlet and outlet sample results from AccuLabs on 8/12/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (4) Sample results from 8/19/10 are not consistent with sample results from other laboratories and are concluded to be erroneous and not included in the minimum, maximum and average.
- (5) N/A indicates not applicable or that the compound was not analyzed for.
- (6) ND indicates non-detect.
- (7) <MDL indicates that the result, if any, was less than the method detection limit.

Siloxane Sampling Summary  
Plant 1 - Digester Gas Cleaning System

Collection Date	Lab	Collection Method	Decamethyltetrasiloxane (L4)				Decamethylcyclopentasiloxane (D5)				Total Siloxane	
			Inlet		Outlet		Inlet		Outlet		Inlet	Outlet
			Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)	Rpt Lmt (ppbv)	Amt (ppbv)		
3/16/2010	Centek	Tedlar Bag	20	84	20	ND	20	2900	20	7.0	<b>3,584.0</b>	<MDL
4/7/2010	Centek	Tedlar Bag	20	170	10	ND	20	7500	10	8.8	<b>8,510.0</b>	<MDL
4/29/2010	Centek	Tedlar Bag	50	100	10	ND	50	14000	10	ND	<b>15,700.0</b>	ND
5/19/2010	Centek (1)	Tedlar Bag	20	83	10	ND	20	3500	10	ND	<b>4,393.0</b>	<MDL
5/27/2010	Centek	Tedlar Bag	20	73	10	0.22	20	1300	10	15	<b>2,673.0</b>	<b>15.0</b>
5/27/2010	Centek	Methanol Impinger	20	N/A	10	ND	20	2478	10	ND	<b>2,847.0</b>	ND
6/11/2010	Centek	Tedlar Bag	20	130	10	ND	20	7700	10	36	<b>8,490.0</b>	<b>248.0</b>
6/29/2010	Centek (2)	Tedlar Bag	20	170	10	ND	20	7900	10	39	<b>8,690.0</b>	<b>39.0</b>
8/12/2010	AccuLabs (3)	Summa Canister	0.025	<0.01	0.025	<0.01	0.025	<0.01	0.025	<0.01	<b>3.1</b>	<b>3.0</b>
8/12/2010	AtmAA	Tedlar Bag	N/A	ND	N/A	ND	N/A	3254	N/A	ND	<b>3,725.0</b>	ND
8/19/2010	AccuLabs (4)	Tedlar Bag	0.025	6.36	0.025	ND	0.03	860	0.03	ND	<b>919.3</b>	<b>0.3</b>
8/19/2010	AccuLabs (4)	Summa Canister	0.025	6.72	0.025	ND	0.1	908	0.025	ND	<b>970.6</b>	<b>0.3</b>
9/1/2010	AtmAA	Tedlar Bag	80	<MDL	80	<MDL	80	4058	80	<MDL	<b>4,568.0</b>	<0.4
9/15/2010	AtmAA	Tedlar Bag	80	<MDL	80	<MDL	80	3486	80	<MDL	<b>4,346.0</b>	<0.4
9/20/2010	AtmAA	Tedlar Bag	80	<MDL	80	<MDL	80	4862	80	<MDL	<b>5,726.0</b>	<0.4
11/4/2010	AtmAA	Tedlar Bag	80	<MDL	N/A	N/A	80	4632	N/A	N/A	<b>5,229.0</b>	N/A
1/12/2011	AtmAA	Tedlar Bag	80	<MDL	N/A	N/A	80	6140	N/A	N/A	<b>6,549.0</b>	N/A
2/9/2011	AtmAA	Tedlar Bag	80	<MDL	80	<MDL	80	4160	80	<MDL	<b>4,580.0</b>	<MDL
2/24/2011	AtmAA	Tedlar Bag	80	<MDL	N/A	N/A	80	6200	N/A	N/A	<b>6,638.0</b>	N/A
<b>Minimum</b>			N/A	<b>73</b>	N/A	<b>0.2</b>	N/A	<b>1,300</b>	N/A	<b>7.0</b>	<b>919</b>	<b>0.3</b>
<b>Maximum</b>			N/A	<b>170</b>	N/A	<b>0.2</b>	N/A	<b>14,000</b>	N/A	<b>36.0</b>	<b>15,700</b>	<b>248.0</b>
<b>Average</b>			N/A	<b>121</b>	N/A	<b>0.2</b>	N/A	<b>5,371</b>	N/A	<b>16.7</b>	<b>5,452</b>	<b>60.5</b>

**APPENDIX B-4:**

**Volatile Organic Compound Summary**

VOC Data Summary  
Plant 1 - Digester Gas Cleaning System

Analyte	3/16/2010				3/16/2010		4/7/2010				4/29/2010			
	Centek				AccuLabs (Summa Canister)		Centek				Centek			
	Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)	
	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt
Acetone	40	ND	40	40	2.5	<2.5	40	ND	20	17	100	63	20	15
Benzene	20	13	20	ND	0.5	9.25	20	8.2	10	ND	50	10	10	ND
Carbon Disulfide	20	ND	20	ND	0.5	0.97	20	ND	10	3.4	50	ND	10	5
Chlorobenzene	20	ND	20	ND	0.5	<0.21	20	ND	10	ND	50	ND	10	ND
Cyclohexane	20	ND	20	ND	0.5	2.94	20	18	10	ND	50	22	10	ND
1,2-Dichlorobenzene	20	ND	20	ND	0.5	0.33	20	ND	10	ND	50	ND	10	ND
1,4-Dichlorobenzene	20	5	20	ND	0.5	12.6	20	ND	10	ND	50	28	10	ND
cis-1,2-Dichloroethene	20	35	20	4.3	0.5	30.6	20	23	10	ND	50	45	10	12
trans-1,2-Dichloroethene	20	ND	20	ND	0.5	<0.20	20	ND	10	ND	50	ND	10	ND
Ethanol	N/A	N/A	N/A	N/A	1.0	<0.37	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ethyl Acetate	40	ND	40	ND	1.0	<0.45	40	ND	20	ND	100	ND	20	ND
Ethylbenzene	20	37	20	ND	0.5	33.4	20	44	10	ND	50	100	10	ND
4-Ethyltoluene	20	20	20	ND	0.5	14.7	20	21	10	ND	50	43	10	ND
Freon 11	20	ND	20	ND	N/A	N/A	20	ND	10	ND	50	ND	10	2.9
n-Heptane	20	73	20	ND	0.5	55.9	20	75	10	ND	50	100	10	ND
Hexane	20	ND	20	ND	0.5	80.2	20	88	10	ND	50	210	10	ND
Isopropyl Alcohol	20	ND	20	300	N/A	N/A	20	ND	10	30	50	ND	10	13
Methylene Chloride	20	7.7	20	ND	2.5	7.63	20	5.2	10	3.8	50	12	10	5.2
Methyl Isobutyl Ketone (MIBK)	40	ND	40	ND	2.0	<0.57	40	ND	20		100	ND	20	ND
2-Propanol (IPA)	N/A	N/A	N/A	N/A	1.0	4.05	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Propene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Propylene	20	ND	20	ND	5.0	2140	20	ND	10	ND	50	ND	10	ND
Styrene	20	4.7	20	ND	0.5	5.65	20	4.2	10	ND	50	19	10	ND
Tetrachloroethene (PCE)	N/A	N/A	N/A	N/A	0.5	5.16	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tetrachloroethylene	20	8.2	20	ND	N/A	N/A	20	ND	10	ND	50	ND	10	ND
Toluene	20	1200	20	ND	5.0	1350	20	1300	10	4.1	50	1600	10	ND
1,2,4-Trichlorobenzene	20	ND	20	ND	0.5	<0.26	20	ND	10	ND	50	ND	10	ND
Trichloroethene (TCE)	20	12	20	11	0.5	7.26	20	9.6	10	ND	50	14	10	ND
Trichloroethylene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Trichlorofluoromethane(F-11)	N/A	N/A	N/A	N/A	2.0	2.36	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1,2,4-Trimethylbenzene	20	76	20	ND	0.5	110	20	70	10	ND	50	240	10	ND
1,3,5-Trimethylbenzene	20	33	20	ND	0.5	38.5	20	30	10	ND	50	88	10	ND
2,2,4-Trimethylpentane	20	27	20	ND	N/A	N/A	20	66	10	ND	50	65	10	ND
Vinyl Chloride	20	ND	20	ND	0.5	2.39	20	ND	10	ND	50	ND	10	ND
m & p-Xylene	40	69	40	ND	1.0	76.8	40	76	20	ND	100	100	20	ND
o-Xylene	20	24	20	ND	0.5	27.9	20	26	10	ND	50	41	10	ND
<b>Total VOCs</b>	<b>N/A</b>	<b>1,594</b>	<b>N/A</b>	<b>340</b>	<b>N/A</b>	<b>4,019</b>	<b>N/A</b>	<b>1,819</b>	<b>N/A</b>	<b>30</b>	<b>N/A</b>	<b>2,403</b>	<b>N/A</b>	<b>25</b>

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- (5) N/A indicates not applicable or that the compound was not analyzed for.
- (6) ND indicates non-detect.
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VOC Data Summary  
Plant 1 - Digester Gas Cleaning System

Analyte	5/11/2010				5/19/2010				5/25/2010				5/27/2010			
	OCS D				Centek (1)				OCS D				Centek			
	Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)	
	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt
Acetone	4.300	7.24	4.640	7.01	40	ND	20	45	4.640	10.2	4.300	9.67	40	ND	20	ND
Benzene	3.900	9.53	4.210	ND	20	22	10	11	4.210	9.28	3.900	ND	20	9.8	10	4.1
Carbon Disulfide	6.280	ND	6.780	ND	20	9.8	10	21	6.780	ND	6.280	ND	20	ND	10	3.5
Chlorobenzene	3.780	4.57	4.080	ND	20	9.6	10	ND	4.080	5.85	3.780	ND	20	ND	10	ND
Cyclohexane	3.820	ND	4.130	ND	20	33	10	12	4.130	ND	3.820	ND	20	12	10	6.5
1,2-Dichlorobenzene	3.520	ND	3.810	ND	20	ND	10	ND	3.810	ND	3.520	ND	20	ND	10	ND
1,4-Dichlorobenzene	3.580	20.8	3.860	ND	20	47	10	ND	3.860	26.8	3.580	ND	20	5.3	10	ND
cis-1,2-Dichloroethene	3.080	37.7	3.320	17.1	20	360	10	54	3.320	103	3.080	72.4	20	80	10	63
trans-1,2-Dichloroethene	3.680	ND	3.970	ND	20	32	10	4.4	3.970	ND	3.680	3.71	20	ND	10	5.8
Ethanol	4.300	ND	4.640	ND	N/A	N/A	N/A	N/A	4.640	ND	4.300	ND	N/A	N/A	N/A	N/A
Ethyl Acetate	5.450	ND	5.890	ND	40	ND	20	ND	5.890	ND	5.450	ND	40	ND	20	4.3
Ethylbenzene	3.380	85.4	3.640	ND	20	250	10	2.6	3.640	141	3.380	ND	20	96	10	7.8
4-Ethyltoluene	3.000	59.3	3.240	ND	20	65	10	ND	3.240	51.1	3.000	ND	20	16	10	ND
Freon 11	N/A	N/A	N/A	N/A	20	ND	10	5.1	N/A	N/A	N/A	N/A	20	6.3	10	4.8
n-Heptane	3.080	83.8	3.320	ND	20	210	10	3	3.320	87.2	3.080	41.8	20	76	10	36
Hexane	3.620	37	3.920	ND	20	200	10	47	3.920	36.6	3.620	9.55	20	150	10	27
Isopropyl Alcohol	2.950	ND	3.190	ND	20	ND	10	27	3.190	ND	2.950	ND	20	ND	10	ND
Methylene Chloride	5.220	ND	5.640	ND	20	9	10	9.4	5.640	ND	5.220	ND	20	8.2	10	7.3
Methyl Isobutyl Ketone (MIBK)	2.950	ND	3.190	ND	40	ND	20	ND	3.190	ND	2.950	ND	40	ND	20	ND
2-Propanol (IPA)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Propene	44.600	3270	48.800	3480	N/A	N/A	N/A	N/A	49.300	3130	45.400	3470	N/A	N/A	N/A	N/A
Propylene	N/A	N/A	N/A	N/A	20	ND	10	ND	N/A	N/A	N/A	N/A	20	ND	10	ND
Styrene	2.080	7.92	2.240	ND	20	49	10	ND	2.240	24.7	2.080	ND	20	13	10	4.3
Tetrachloroethene (PCE)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tetrachloroethylene	3.350	ND	3.620	ND	20	370	10	ND	3.620	ND	3.350	6.56	20	6	10	4.2
Toluene	23.600	1340	2.560	ND	20	2700	10	25	26.000	2010	23.900	1030	50	1200	20	360
1,2,4-Trichlorobenzene	2.600	ND	2.810	ND	20	ND	10	ND	2.810	ND	2.600	ND	20	ND	10	ND
Trichloroethene (TCE)	N/A	N/A	N/A	N/A	20	610	10	22	N/A	N/A	N/A	N/A	20	14	10	7.6
Trichloroethylene	3.520	9.67	3.810	ND	N/A	N/A	N/A	N/A	3.810	12.7	3.520	10.2	N/A	N/A	N/A	N/A
Trichlorofluoromethane(F-11)	7.120	ND	7.700	ND	N/A	N/A	N/A	N/A	7.700	ND	7.120	ND	N/A	N/A	N/A	N/A
1,2,4-Trimethylbenzene	3.300	178	3.560	ND	20	430	10	ND	3.560	188	3.300	ND	20	81	10	ND
1,3,5-Trimethylbenzene	4.100	77.1	4.430	ND	20	150	10	ND	4.430	76.2	4.100	ND	20	35	10	ND
2,2,4-Trimethylpentane	N/A	N/A	N/A	N/A	20	89	10	3.2	N/A	N/A	N/A	N/A	20	60	10	25
Vinyl Chloride	5.200	ND	5.620	ND	20	12	10	5.8	5.620	ND	5.200	6.81	20	ND	10	6.6
m & p-Xylene	4.220	103	4.560	ND	40	240	20	ND	4.560	88.5	4.220	ND	40	47	20	ND
o-Xylene	4.050	42.6	4.370	ND	20	91	10	ND	4.370	35.6	4.050	ND	20	20	10	ND
<b>Total VOCs</b>	<b>N/A</b>	<b>5,374</b>	<b>N/A</b>	<b>3,504</b>	<b>N/A</b>	<b>5,948</b>	<b>N/A</b>	<b>264</b>	<b>N/A</b>	<b>6,037</b>	<b>N/A</b>	<b>4,651</b>	<b>N/A</b>	<b>1,845</b>	<b>N/A</b>	<b>511</b>

VOC Data Summary  
Plant 1 - Digester Gas Cleaning System

Analyte	6/8/2010				6/11/2010				6/29/2010				7/7/2010			
	OCSD				Centek				Centek (2)				OCSD			
	Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)	
	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt
Acetone	4.470	ND	4.820	ND	40	ND	40	200	40	88	20	65	4.640	9.24	5.160	ND
Benzene	4.060	11	4.370	6.01	20	15	20	7.2	20	14	10	ND	4.210	7.34	4.680	ND
Carbon Disulfide	6.530	ND	7.030	ND	20	ND	20	5.8	20	ND	10	3.2	6.780	ND	7.530	ND
Chlorobenzene	3.930	ND	4.230	ND	20	5.9	20	ND	20	6.4	10	ND	4.080	ND	4.530	ND
Cyclohexane	3.980	ND	4.280	ND	20	ND	20	9.2	20	16	10	ND	4.130	ND	4.590	ND
1,2-Dichlorobenzene	3.670	ND	3.950	ND	20	ND	20	ND	20	ND	10	ND	3.810	ND	4.230	ND
1,4-Dichlorobenzene	3.720	19.2	4.000	ND	20	16	20	ND	20	17	10	ND	3.860	ND	4.290	ND
cis-1,2-Dichloroethene	3.200	37.6	3.440	59.6	20	42	20	55	20	44	10	ND	3.320	22.7	3.690	ND
trans-1,2-Dichloroethene	3.820	ND	4.120	ND	20	ND	20	ND	20	4.6	10	ND	3.970	ND	4.410	ND
Ethanol	4.470	ND	4.820	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.640	ND	5.160	ND
Ethyl Acetate	5.670	ND	6.100	ND	40	ND	40	ND	40	ND	20	ND	5.890	ND	6.540	ND
Ethylbenzene	3.510	74.1	3.780	38.9	20	110	20	61	20	84	10	ND	3.640	62.4	4.050	ND
4-Ethyltoluene	3.120	68.6	3.360	ND	20	31	20	9	20	21	10	ND	3.240	28.8	3.600	ND
Freon 11	N/A	N/A	N/A	N/A	20	ND	20	5.9	20	5.2	10	3.5	N/A	N/A	N/A	N/A
n-Heptane	3.200	62.4	3.440	45.8	20	94	20	44	20	99	10	ND	3.320	79.1	3.690	ND
Hexane	3.770	33.7	4.060	26.6	20	130	20	35	20	160	10	3.2	3.920	35.6	4.350	ND
Isopropyl Alcohol	3.070	ND	3.300	ND	20	ND	20	ND	20	ND	10	ND	3.190	ND	3.540	ND
Methylene Chloride	5.430	ND	5.850	5.96	20	9.3	20	13	20	14	10	8.8	5.640	ND	6.270	6.38
Methyl Isobutyl Ketone (MIBK)	3.070	ND	3.300	ND	40	ND	40	ND	40	ND	20	ND	3.190	ND	3.540	ND
2-Propanol (IPA)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Propene	47.200	3630	49.900	4130	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	47.900	3270	53.800	3600
Propylene	N/A	N/A	N/A	N/A	20	ND	20	ND	20	ND	10	ND	N/A	N/A	N/A	N/A
Styrene	2.160	8.4	2.320	ND	20	23	20	6.2	20	15	10	2.6	2.240	7.18	2.490	ND
Tetrachloroethene (PCE)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tetrachloroethylene	3.480	ND	3.750	11.5	20	21	20	7.5	20	13	10	ND	3.620	ND	4.020	ND
Toluene	24.900	3080	26.300	1400	20	3600	20	800	20	2000	10	3.7	25.300	2090	2.850	ND
1,2,4-Trichlorobenzene	2.700	ND	2.910	ND	20	ND	20	ND	20	9.2	10	ND	2.810	ND	3.120	ND
Trichloroethene (TCE)	N/A	N/A	N/A	N/A	20	28	20	16	20	17	10	ND	N/A	N/A	N/A	N/A
Trichloroethylene	3.670	6.24	3.950	12.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.810	7.14	4.230	ND
Trichlorofluoromethane(F-11)	7.410	ND	7.980	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.700	ND	8.550	ND
1,2,4-Trimethylbenzene	3.430	117	3.700	ND	20	190	20	ND	20	120	10	ND	3.560	124	3.960	ND
1,3,5-Trimethylbenzene	4.260	38.4	4.590	ND	20	69	20	ND	20	44	10	ND	4.430	36.2	4.920	ND
2,2,4-Trimethylpentane	N/A	N/A	N/A	N/A	20	55	20	31	20	39	10	ND	N/A	N/A	N/A	N/A
Vinyl Chloride	5.410	ND	5.820	ND	20	ND	20	ND	20	ND	10	ND	5.620	ND	6.240	ND
m & p-Xylene	4.390	60.5	4.730	31.4	40	100	40	52	40	180	20	ND	4.560	111	5.070	7.90
o-Xylene	4.210	24.4	4.540	ND	20	42	20	10	20	64	10	ND	4.370	41.6	4.860	ND
<b>Total VOCs</b>	<b>N/A</b>	<b>7,272</b>	<b>N/A</b>	<b>5,768</b>	<b>N/A</b>	<b>4,535</b>	<b>N/A</b>	<b>1,278</b>	<b>N/A</b>	<b>2,943</b>	<b>N/A</b>	<b>65</b>	<b>N/A</b>	<b>5,932</b>	<b>N/A</b>	<b>3,614</b>

VOC Data Summary  
Plant 1 - Digester Gas Cleaning System

Analyte	7/21/2010				8/3/2010				8/12/2010				8/12/2010			
	OCSD				OCSD				OCSD				AccuLabs, Inc. - Summa Canisters (3)			
	Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)	
	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt
Acetone	4.300	6.97	4.820	12.7	4.640	17.7	4.990	13.8	4.820	10.7	4.640	13	N/A	N/A	N/A	N/A
Benzene	3.900	8.70	4.370	ND	4.210	10.9	4.520	ND	4.370	9.15	4.210	ND	N/A	N/A	N/A	N/A
Carbon Disulfide	6.280	ND	7.030	ND	7.280	ND	7.280	ND	7.030	ND	6.780	ND	N/A	N/A	N/A	N/A
Chlorobenzene	3.780	ND	4.230	ND	4.380	ND	4.380	ND	4.230	ND	4.080	ND	N/A	N/A	N/A	N/A
Cyclohexane	3.820	ND	4.280	ND	4.440	ND	4.440	ND	4.280	8.88	4.130	ND	N/A	N/A	N/A	N/A
1,2-Dichlorobenzene	3.520	ND	3.950	ND	4.090	ND	4.090	ND	3.950	ND	3.810	ND	N/A	N/A	N/A	N/A
1,4-Dichlorobenzene	3.580	ND	4.000	ND	4.150	ND	4.150	ND	4.000	ND	3.860	ND	N/A	N/A	N/A	N/A
cis-1,2-Dichloroethene	3.080	17.2	3.440	17.3	3.320	44.2	3.570	65.1	3.440	24.6	3.320	60.2	N/A	N/A	N/A	N/A
trans-1,2-Dichloroethene	3.680	ND	4.120	ND	4.260	ND	4.260	ND	4.120	ND	3.970	ND	N/A	N/A	N/A	N/A
Ethanol	4.300	ND	4.820	9.89	4.990	ND	4.990	5.52	4.820	ND	4.640	ND	N/A	N/A	N/A	N/A
Ethyl Acetate	5.450	ND	6.100	ND	6.320	ND	6.320	ND	6.100	ND	5.890	ND	N/A	N/A	N/A	N/A
Ethylbenzene	3.380	60.7	3.780	ND	3.640	50.2	3.920	4.07	3.780	52.8	3.640	ND	N/A	N/A	N/A	N/A
4-Ethyltoluene	3.000	34.2	3.360	ND	3.240	32.1	3.480	ND	3.360	26.3	3.240	ND	N/A	N/A	N/A	N/A
Freon 11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
n-Heptane	3.080	84.1	3.440	ND	3.320	82.8	3.570	26.3	3.440	122	3.320	17.3	N/A	N/A	N/A	N/A
Hexane	3.620	40.5	4.060	13.8	3.920	48.4	4.200	21.4	4.060	65.1	3.920	26.8	N/A	N/A	N/A	N/A
Isopropyl Alcohol	2.950	ND	3.300	ND	3.420	ND	3.420	ND	3.300	ND	3.190	ND	N/A	N/A	N/A	N/A
Methylene Chloride	5.220	ND	5.850	9.52	5.640	5.87	6.060	ND	5.850	6.01	5.640	6.19	N/A	N/A	N/A	N/A
Methyl Isobutyl Ketone (MIBK)	2.950	ND	3.300	ND	3.420	ND	3.420	ND	3.300	ND	3.190	ND	N/A	N/A	N/A	N/A
2-Propanol (IPA)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Propene	45.200	3140	49.500	3540	48.100	3630	52.400	3590	50.400	3140	49.300	3600	N/A	N/A	N/A	N/A
Propylene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Styrene	2.080	7.19	2.320	ND	2.240	4.95	2.410	ND	2.320	6.01	2.240	ND	N/A	N/A	N/A	N/A
Tetrachloroethene (PCE)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tetrachloroethylene	3.350	ND	3.750	ND	3.620	26.3	3.890	ND	3.750	ND	3.620	ND	N/A	N/A	N/A	N/A
Toluene	23.800	2510	2.660	ND	25.400	2110	2.760	ND	26.600	2680	2.560	9.76	N/A	N/A	N/A	N/A
1,2,4-Trichlorobenzene	2.600	ND	2.910	ND	3.560	ND	3.020	ND	2.910	ND	2.810	ND	N/A	N/A	N/A	N/A
Trichloroethene (TCE)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Trichloroethylene	3.520	9.78	3.950	ND	3.810	22.9	4.090	5.67	3.950	12.8	3.810	5.21	N/A	N/A	N/A	N/A
Trichlorofluoromethane(F-11)	7.120	ND	7.980	ND	8.260	ND	8.260	ND	7.980	ND	7.700	ND	N/A	N/A	N/A	N/A
1,2,4-Trimethylbenzene	3.300	154	3.700	ND	3.560	121	3.830	ND	3.700	115	3.560	ND	N/A	N/A	N/A	N/A
1,3,5-Trimethylbenzene	4.100	45.8	4.590	ND	4.430	39.9	4.760	ND	4.590	39.6	4.430	ND	N/A	N/A	N/A	N/A
2,2,4-Trimethylpentane	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Vinyl Chloride	5.200	ND	5.820	ND	6.030	ND	6.030	ND	5.820	ND	5.620	ND	N/A	N/A	N/A	N/A
m & p-Xylene	4.220	110	4.730	ND	4.560	82.9	4.900	15.4	4.730	83.2	4.560	ND	N/A	N/A	N/A	N/A
o-Xylene	4.050	43.3	4.540	ND	4.370	33.4	4.700	ND	4.540	31.4	4.370	ND	N/A	N/A	N/A	N/A
<b>Total VOCs</b>	<b>N/A</b>	<b>6,272</b>	<b>N/A</b>	<b>3,593</b>	<b>N/A</b>	<b>6,364</b>	<b>N/A</b>	<b>3,747</b>	<b>N/A</b>	<b>6,434</b>	<b>N/A</b>	<b>3,738</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>



VOC Data Summary  
Plant 1 - Digester Gas Cleaning System

Analyte	8/12/2010				8/19/2010				8/19/2010				9/1/2010			
	AtmAA Inc. - Tedlar Bags				AccuLabs, Inc. - Tedlar Bags (4)				AccuLabs, Inc. - Summa Canisters (4)				OCS D			
	Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)	
	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt
Acetone	N/A	79	N/A	42.2	2.5	62	2.5	33.7	2.5	27.3	2.5	20.5	4.640	11	4.640	14.9
Benzene	N/A	15.70	N/A	7.83	0.5	14.80	0.5	3.72	0.5	15.20	0.5	3.4	4.210	7.75	4.210	7.55
Carbon Disulfide	8	ND	8	ND	0.5	1.21	0.5	3.13	0.5	1.16	0.5	3.91	6.780	ND	6.780	9.3
Chlorobenzene	8	ND	8	ND	0.5	ND	0.5	ND	0.5	ND	0.5	ND	4.080	ND	4.080	ND
Cyclohexane	8	ND	8	ND	0.5	7.61	0.5	ND	0.5	7.82	0.5	1.72	4.130	ND	4.130	ND
1,2-Dichlorobenzene	6	ND	6	ND	0.5	ND	0.5	ND	0.5	ND	0.5	ND	3.810	ND	3.810	ND
1,4-Dichlorobenzene	6	8.32	6	ND	0.5	4.47	0.5	ND	0.5	10.8	0.5	ND	3.860	17.9	3.860	ND
cis-1,2-Dichloroethene	N/A	34.1	N/A	66.9	0.5	45.2	0.5	44.2	0.5	47.3	0.5	44.7	3.320	47.3	3.320	70.3
trans-1,2-Dichloroethene	8	ND	8	ND	0.5	ND	0.5	ND	0.5	ND	0.5	ND	3.970	ND	3.970	ND
Ethanol	N/A	N/A	N/A	N/A	1.0	ND	1.0	ND	1.0	ND	1.0	ND	4.640	ND	4.640	ND
Ethyl Acetate	N/A	22.2	N/A	15.3	1.0	ND	1.0	ND	1.0	ND	1.0	ND	5.890	ND	5.890	ND
Ethylbenzene	8	52.4	8	ND	0.5	54.2	0.5	1.85	0.5	59.7	0.5	1.2	3.640	73.2	3.640	ND
4-Ethyltoluene	8	64.1	8	ND	0.5	11.5	0.5	ND	0.5	14.9	0.5	1.3	3.240	12.7	3.240	ND
Freon 11	N/A	ND	N/A	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
n-Heptane	8	ND	8	36.2	0.5	95.1	0.5	10.1	0.5	91.1	0.5	9.21	3.320	85.3	3.320	9.94
Hexane	N/A	97.9	N/A	44	0.5	90.1	0.5	10.2	0.5	89.5	0.5	9.9	3.920	52.1	3.920	33.4
Isopropyl Alcohol	12	ND	12	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.190	ND	3.190	ND
Methylene Chloride	8	ND	8	ND	2.5	14.4	2.5	6.54	2.5	12.1	2.5	6.26	5.640	ND	5.640	ND
Methyl Isobutyl Ketone (MIBK)	N/A	N/A	N/A	N/A	2.0	5.91	2.0	ND	2.0	5.82	2.0	ND	3.190	ND	3.190	ND
2-Propanol (IPA)	N/A	N/A	N/A	N/A	1.0	ND	1.0	ND	1.0	ND	1.0	ND	N/A	N/A	N/A	N/A
Propene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	101.000	3320	47.900	3980
Propylene	N/A	N/A	N/A	N/A	5.0	2910	5.0	1620	5.0	2870	5.0	1510	N/A	N/A	N/A	N/A
Styrene	8	ND	8	ND	0.5	4.96	0.5	ND	0.5	6.9	0.5	ND	2.240	12.9	2.240	ND
Tetrachloroethene (PCE)	6	11	6	ND	0.5	8.32	0.5	0.95	0.5	8.97	0.5	0.86	N/A	N/A	N/A	N/A
Tetrachloroethylene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.620	6.64	3.620	ND
Toluene	N/A	1630	N/A	18.6	5.0	1430	0.5	42.7	5.0	1570	0.5	40.4	53.400	7300	2.560	287
1,2,4-Trichlorobenzene	8	ND	8	ND	0.5	ND	0.5	ND	0.5	ND	0.5	ND	2.810	ND	3.560	ND
Trichloroethene (TCE)	N/A	16.3	N/A	8.38	0.5	16.6	0.5	3.72	0.5	18.1	0.5	3.37	N/A	N/A	N/A	N/A
Trichloroethylene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.810	9.21	3.810	10.6
Trichlorofluoromethane(F-11)	N/A	N/A	N/A	N/A	2.0	4.6	2.0	1.23	2.0	4.11	2.0	3.66	7.700	ND	7.700	ND
1,2,4-Trimethylbenzene	8	70.2	8	ND	0.5	38.5	0.5	1.57	0.5	56.7	0.5	6.49	3.560	67.1	3.560	ND
1,3,5-Trimethylbenzene	8	33	8	ND	0.5	18.8	0.5	0.44	0.5	23.9	0.5	1.82	4.430	34	4.430	ND
2,2,4-Trimethylpentane	8	ND	8	ND	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Vinyl Chloride	6	ND	6	ND	0.5	2.19	0.5	2.43	0.5	2.97	0.5	2.28	5.620	ND	5.620	ND
m & p-Xylene	8	91.6	8	ND	1.0	117	1.0	4.07	1.0	134	1.0	5.28	4.560	54.6	4.560	ND
o-Xylene	8	33.4	8	ND	0.5	40.2	0.5	2.19	0.5	45.6	0.5	2.48	4.370	21.6	4.370	ND
<b>Total VOCs</b>	<b>N/A</b>	<b>2,259</b>	<b>N/A</b>	<b>239</b>	<b>N/A</b>	<b>4,998</b>	<b>N/A</b>	<b>1,791</b>	<b>N/A</b>	<b>5,124</b>	<b>N/A</b>	<b>1,679</b>	<b>N/A</b>	<b>11,133</b>	<b>N/A</b>	<b>4,423</b>

VOC Data Summary  
Plant 1 - Digester Gas Cleaning System

Analyte	9/14/2010				1/13/2011				2/9/2011			
	OCSD				OCSD				OCSD			
	Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)		Inlet (ppbv)		Outlet (ppbv)	
	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt	Rpt Lmt	Amt
Acetone	4.820	7.29	4.640	14.2	4.820	19.6	4.990	15.2	4.820	8.69	4.640	ND
Benzene	4.370	10.40	4.210	23	4.370	12.10	4.520	5.57	4.370	11.40	4.210	ND
Carbon Disulfide	7.030	ND	6.780	7.22	7.030	ND	7.280	ND	7.030	ND	6.780	ND
Chlorobenzene	4.230	ND	4.080	ND	4.230	4.5	4.380	ND	4.230	ND	4.080	ND
Cyclohexane	4.280	4.91	4.130	9.71	4.280	ND	4.440	4.52	4.280	ND	4.130	ND
1,2-Dichlorobenzene	3.950	ND	3.810	ND	3.950	ND	4.090	ND	3.950	ND	3.810	ND
1,4-Dichlorobenzene	4.000	ND	3.860	ND	4.000	ND	4.150	ND	4.000	ND	3.860	ND
cis-1,2-Dichloroethene	3.440	41.2	3.320	82.3	3.440	35.5	3.570	61.1	3.440	31.8	3.320	29.1
trans-1,2-Dichloroethene	4.120	ND	3.970	ND	4.120	ND	4.260	ND	4.120	ND	3.970	ND
Ethanol	4.820	ND	4.640	ND	4.820	ND	4.990	ND	4.820	ND	5.720	ND
Ethyl Acetate	6.100	ND	5.890	ND	6.100	ND	6.320	ND	6.100	ND	5.890	ND
Ethylbenzene	3.780	92.7	3.640	13.2	3.700	58	3.920	ND	3.780	61.2	3.640	22.2
4-Ethyltoluene	3.360	23.2	3.240	ND	3.360	30.3	3.480	ND	3.360	23.6	3.240	ND
Freon 11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
n-Heptane	3.440	106	3.320	86	3.440	63.9	3.570	46.6	3.440	57.8	3.320	10.9
Hexane	4.060	57.2	3.920	130	4.060	27	4.200	47.6	4.060	31.1	3.920	13.4
Isopropyl Alcohol	3.300	ND	3.190	ND	3.300	ND	3.420	ND	3.300	ND	3.190	ND
Methylene Chloride	5.850	ND	5.640	ND	5.850	11.6	6.060	16.3	5.850	9.32	5.640	8.19
Methyl Isobutyl Ketone (MIBK)	3.300	ND	3.190	ND	3.300	4.51	3.420	ND	3.300	4.38	3.190	ND
2-Propanol (IPA)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Propene	50.200	3730	48.800	4100	50.900	2410	51.500	2370	49.900	2820	48.400	2370
Propylene	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Styrene	2.320	9.27	2.240	ND	2.320	8.06	2.410	ND	2.320	6.83	2.240	ND
Tetrachloroethene (PCE)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tetrachloroethylene	3.750	ND	3.620	ND	3.750	ND	3.890	ND	3.750	ND	3.620	ND
Toluene	26.500	2690	25.700	2860	26.900	1090	2.760	9.72	26.300	1900	25.600	377
1,2,4-Trichlorobenzene	2.910	ND	2.810	ND	2.910	ND	3.020	ND	2.910	ND	2.810	ND
Trichloroethene (TCE)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Trichloroethylene	3.950	8.06	3.810	26.5	3.950	21.4	4.090	9.21	3.950	9.34	3.910	5.18
Trichlorofluoromethane(F-11)	7.980	ND	7.700	ND	7.980	ND	8.260	ND	7.980	ND	7.700	ND
1,2,4-Trimethylbenzene	3.700	104	3.560	ND	3.700	99	3.830	ND	3.700	101	3.560	ND
1,3,5-Trimethylbenzene	4.590	38.3	3.240	ND	4.590	33.2	4.760	ND	4.590	33.2	4.430	ND
2,2,4-Trimethylpentane	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Vinyl Chloride	5.820	ND	5.620	ND	5.820	ND	6.030	ND	5.820	ND	5.620	ND
m & p-Xylene	4.730	159	4.560	ND	4.730	111	4.900	6.41	4.730	102	4.560	31.1
o-Xylene	4.540	57.8	4.370	ND	4.540	38	5.890	ND	4.540	34.1	4.370	ND
<b>Total VOCs</b>	N/A	<b>7,139</b>	N/A	<b>7,352</b>	N/A	<b>4,078</b>	N/A	<b>2592</b>	N/A	<b>5,246</b>	N/A	<b>2867</b>

**APPENDIX B-5:**

**Speciated Siloxane and Hydrogen Sulfide Sampling Summary**

Digester Gas Sampling Summary  
Plant 1 - Digester Gas Cleaning System

Date of Sampling	Approximate Volume of Gas Treated (Million Cubic Feet)	Total Siloxane (ppmv)		H2S			
				OCSD AQMD 307-91 (ppmv)		OCSD Draeger Tube (ppmv)	
		Inlet	Outlet	Inlet	Outlet	Inlet	Outlet
3/16/2010	0.00	3.58	<MDL	N/A	N/A	N/A	N/A
4/7/2010	27.26	8.51	<MDL	N/A	N/A	N/A	N/A
4/21/2010	53.41	N/A	N/A	25.70	ND	26	ND
4/29/2010	68.93	15.70	ND	N/A	N/A	N/A	N/A
5/11/2010	91.86	N/A	N/A	31.70	0.263	31	ND
5/27/2010	122.58	2.67	0.015	N/A	N/A	N/A	N/A
6/8/2010	144.70	N/A	N/A	27.97	2.162	30	2
6/11/2010	146.46	8.49	0.248	N/A	N/A	N/A	N/A
6/12/2010	Carbon media changed.						
6/22/2010	18.44	N/A	N/A	21.62	ND	27	-
6/29/2010	32.70	8.69	N/A	N/A	N/A	N/A	N/A
7/7/2010	46.34	N/A	N/A	28.57	ND	25	N/A
7/21/2010	68.89	N/A	N/A	24.87	ND	25	N/A
8/3/2010	90.04	N/A	N/A	27.45	ND	25	N/A
8/12/2010	106.00	N/A	N/A	28.19	ND	26	N/A
8/12/2010	106.00	3.73	ND	N/A	N/A	N/A	N/A
9/1/2010	137.15	4.57	<MDL	N/A	N/A	N/A	N/A
9/1/2010	137.15	N/A	N/A	14.69	ND	14	N/A
9/14/2010	162.45	N/A	N/A	23.01	0.545	23	N/A
9/15/2010	164.63	4.35	<MDL	N/A	N/A	N/A	N/A
9/17/2010	168.63	N/A	N/A	N/A	N/A	-	2.5
9/20/2010	173.62	5.73	<MDL	N/A	N/A	N/A	N/A
9/21/2010	Carbon media changed.						
11/4/2010	43.40	5.23	N/A	N/A	N/A	N/A	N/A
1/12/2011	114.53	6.55	N/A	N/A	N/A	N/A	N/A
1/25/2011	137.78	N/A	N/A	28.54	ND	27	N/A
2/9/2011	156.47	N/A	N/A	31.87	1.755	30	N/A
2/9/2011	156.47	4.58	<MDL	N/A	N/A	N/A	N/A
2/14/2011	Carbon media changed.						
2/23/2011	17.72	N/A	N/A	24.46	ND	25	N/A
2/24/2011	20.09	6.64	N/A	N/A	N/A	N/A	N/A

Notes:

- (1) All samples are taken using Tedlar Bags, except where otherwise noted as using Draeger® tubes f
- (2) Inlet and outlet sample results from 5/19/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum
- (3) Outlet sample results from 6/29/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum, maximum and average.
- (4) Inlet and outlet sample results from AccuLabs on 8/12/10 are not accurate due to an error in collection, indicated by high nitrogen composition (>5%), and are not included in the minimum,
- (5) Sample results from 8/19/10 are not consistent with sample results from other laboratories and are concluded to be erroneous and not included in the minimum, maximum and average.
- (6) N/A indicates that the compound was not analyzed for.
- (7) ND indicates non-detect.
- (8) <MDL indicates that the result, if any, was less than the method detection limit.

**APPENDIX C-1:**

**CO and NO<sub>x</sub> with Portable Analyzer Summary**

CO and NOx with Portable Analyzer Summary  
Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Load (%)	DG (%)	Testing Time (min)	NH3 Draeger Tube (ppm)	Before Cat Ox		After Cat Ox		After SCR		CO Reduction	NOx Reduction
					CO (ppm) Adj to 15% O2	NOx (ppm) Adj to 15% O2	CO (ppm) Adj to 15% O2	NOx (ppm) Adj to 15% O2	CO (ppm) Adj to 15% O2	NOx (ppm) Adj to 15% O2		
3/29/2010	80	88	15	N/A	448.4	38.7	5.8	39.8	5.3	1.3	98.8%	96.6%
3/30/2010	82	95	15	N/A	453.0	33.5	0.1	34.2	3.3	4.9	99.3%	85.2%
3/31/2010	60	95	10	N/A	353.9	29.7	N/A	N/A	4.0	1.4	98.9%	95.4%
3/31/2010	80	95	10	N/A	431.2	33.9	N/A	N/A	9.2	4.5	97.9%	86.8%
3/31/2010	100	95	10	N/A	452.3	36.5	N/A	N/A	0.0	6.7	100.0%	81.6%
3/31/2010	110	95	10	N/A	446.2	41.9	N/A	N/A	0.3	5.8	99.9%	86.1%
3/31/2010	60	50	10	N/A	347.3	39.6	N/A	N/A	13.8	7.3	96.0%	81.6%
3/31/2010	80	50	10	N/A	472.0	39.9	N/A	N/A	11.5	6.0	97.6%	85.0%
3/31/2010	100	50	10	N/A	513.5	43.7	N/A	N/A	15.7	6.8	97.0%	84.5%
3/31/2010	110	50	10	N/A	478.7	45.8	N/A	N/A	3.4	9.3	99.3%	79.7%
4/1/2010	60	0	10	N/A	380.9	43.6	N/A	N/A	0.6	0.9	99.8%	97.9%
4/1/2010	80	0	10	N/A	559.9	44.1	N/A	N/A	1.3	1.3	99.8%	97.1%
4/1/2010	100	0	10	N/A	591.8	48.1	N/A	N/A	6.0	10.2	99.0%	78.7%
4/1/2010	110	0	10	N/A	532.9	51.9	N/A	N/A	1.3	11.4	99.8%	77.9%
4/7/2010	110	95	15	<MDL	367.5	46.2	1.7	47.3	1.6	10.1	99.6%	78.2%
4/14/2010	100	95	15	N/A	435.5	37.4	0.9	37.8	4.0	5.7	99.1%	84.8%
4/21/2010	90	95	15	<MDL	369.3	41.4	0	41.9	1.5	6.7	99.6%	83.8%
4/29/2010	94	95	15	<MDL	369.3	40.3	2.3	40.1	5.1	8.5	98.6%	78.8%
5/6/2010	100	95	15	<MDL	440.8	41.3	0.7	39.6	2.2	2.7	99.5%	93.5%
5/19/2010	100	95	15	<MDL	525.1	34.5	3.0	36.5	4.7	1.2	99.1%	96.5%
6/29/2010	100	97	15	<MDL	439.7	42.4	2.4	40.5	17.0	8.1	96.1%	81.0%
7/28/2010	95	97	15	<MDL	458.8	39.8	0.1	37.8	8.8	7.3	98.1%	81.7%
8/12/2010	100	96	15	<MDL	408.4	43.5	4.9	44.0	7.6	10.1	98.1%	76.7%
11/4/2010	100	96	15	<MDL	598.7	43.2	0.0	42.5	0.0	10.2	100.0%	76.3%
1/12/2011	100	96	15	<MDL	509.4	37.9	15.1	36.4	17.2	7.7	96.6%	79.7%
2/24/2011	100	95	15	<MDL	496.8	38.5	0.0	39.1	0.1	6.9	100.0%	82.1%

Notes:

- (1) N/A indicates that this data was not collected.
- (2) <MDL indicates that the result, if any, was less than the detection limit.

**APPENDIX C-2:**

**Technical Memorandum:  
OCSD Catalytic Oxidizer/SCR Pilot Study: VOC Evaluation**

**Date:** July 13, 2011  
**To:** File  
**From:** Kit Liang, Malcolm Pirnie, WHI; Daniel Stepner, Malcolm Pirnie, WHI  
**Re:** OCSD Cat Ox/SCR Pilot Study: VOC Evaluation  
**Project No.:** 0788-187

### **Project Background**

The internal combustion (IC) engines at Orange County Sanitation District (OCSD) are subject to South Coast Air Quality Management District (SCAQMD) Rule 1110.2. Rule 1110.2 provides emission limits and monitoring requirements for all stationary and portable engines over 50 brake-horsepower (bhp). Rule 1110.2 (Emissions from Gaseous- and Liquid- Fueled Engines) was promulgated to reduce the NO<sub>x</sub>, CO and volatile organic compounds (VOC) emissions from engines over 50 bhp. On February 1, 2008, Rule 1110.2 was amended in order to achieve further emissions reductions from stationary engines based on the cleanest available technologies. Under the February 2008 amendments to Rule 1110.2 shown below, more stringent NO<sub>x</sub>, CO, and VOC limits were adopted, to become effective for biogas-fueled engines in July 2012 provided a technology assessment confirms that the limits below are achievable.

- NO<sub>x</sub> limit was lowered from 36 ppm (or ~ 45 ppm\*) to 11 ppm at 15% O<sub>2</sub>.
- VOC limit was lowered from 250 ppm\* to 30 ppm at 15% O<sub>2</sub>.
- CO limit was lowered from 2,000 ppm to 250 ppm at 15% O<sub>2</sub>.

\* Existing limits allow for an alternative emission limit for OCSD engines based on the engine efficiency correction factor.

A pilot study of a Johnson Matthey catalytic oxidizer/Selective Catalytic Reduction (Cat Ox/SCR) system was performed at OCSD Plant 1 on Engine 1 from April 2010 through March 2011. Design of the pilot system included an SCR system for NO<sub>x</sub> emission reduction, an oxidation catalyst unit for CO and VOC reduction (including formaldehyde), and a DGCS upstream from the IC engines for removal of siloxanes to prevent fouling of the catalysts. Additional benefits of the DGCS include the removal of total reduced sulfur and total volatile organic compounds. The DGCS cleaned the digester gas fuel for all three Plant 1 IC engines. However, the Cat Ox/SCR system was only installed on Engine 1. As part of this pilot testing program, a sampling program was initiated to determine the concentrations of VOCs at the inlet and outlet of the Cat Ox/SCR system. The sampling was performed by SCEC, a firm listed in the SCAQMD Laboratory Approval Program (LAP). The VOC sampling was performed using SCAQMD Method 25.3.



This memorandum describes the sampling method for VOCs used during the testing and the VOCs concentration results. In addition, the memorandum compares the result found for Engine 1 with results from a recent regulatory compliance study performed on Engines 1, 2, and 3 at Plant 1.

### **VOC Sampling SCAQMD Method 25.3**

The SCAQMD compliance methods for testing for VOCs are SCAQMD Methods 25.1 and 25.3. In general, SCAQMD Method 25.1 is used to collect samples where VOC concentrations are greater or equal to 50 ppm as carbon (ppmC). SCAQMD Method 25.3 is used where VOC concentrations are less than 50 ppmC. With both methods, exhaust gas samples are drawn into evacuated canisters through condensate traps. In Method 25.3, the condensate, largely consisting of water, is collected in the traps at ice water temperature (~32°F), preventing unrecoverable VOC from being collected in the canisters. Based on previous sampling, VOC concentrations in the exhaust gas are expected to be below 50 ppm; therefore, SCAQMD Method 25.3 was used for this pilot study. During the pilot study, exhaust samples are taken at the engine exhaust, prior to the catalyst oxidizer, and at the stack exhaust, following the SCR and heat recovery boiler. Analysis was performed at the laboratory.

The VOC concentration as non-methane non-ethane organic compounds (NMNEOC) is determined by combining the independent analysis results of the condensate in each trap and the gas in the associated canister. The condensate is analyzed for total organic carbon by liquid injection into an infra-red organic carbon analyzer. The gaseous sample in the canister is analyzed for NMNEOC using a combination of gas chromatography, oxidizer, methanizer, and flame ionization detector. Carbon monoxide and fixed gases in the sample can be determined by analysis of the canister portion of the sample.

### **VOC Monitoring Results and Discussion**

Pilot testing of the Cat Ox/SCR system commenced on April 1, 2010 and continued through March 31, 2011. Throughout the pilot testing, SCEC tested VOCs at the engine exhaust before the catalytic oxidizer and at the stack outlet after the SCR and heat recovery boiler on the roof of the Central Generator (CenGen) Building. Results of the VOC data are summarized in Table 1.

Table 1 presents a summary of the VOC field measurements using SCAQMD Method 25.3. The percent reduction of VOC ranged from 59.1% to 97.8%. The average concentration of VOC at the stack exhaust was 3.58 ppmv, below the emission limit of 30 ppmv in the Amended Rule 1110.2.

**Table 1:  
Measured VOC Concentrations – Plant 1 Engine 1**

Date	Engine Exhaust (ppmv)	Stack Exhaust (ppmv)	% Reduction
4/7/2010	27.1	2.0	90.4
5/11/2010	33.0	0.7	97.8
8/12/2010	15.1	5.4	64.0
11/4/2010	10.3	4.2	59.1
2/24/2011	25.0	5.0	80.2
<b>Average</b>	<b>21.8</b>	<b>3.6</b>	<b>83.6</b>

- Notes: 1. All concentrations are adjusted to 15% O<sub>2</sub>.  
2. All samples were collected using SCAQMD Method 25.3

Data measured during the pilot testing period was compared to VOC concentrations measured by SCEC for the *OCSD Plant No. 1 Unit Nos. 1, 2, 3 Rule 1110.2 8760 Hour & Permit Compliance Test Report for Year 2011*. Table 2 summarizes the annual permit compliance VOC test results for OCSD Plant No. 1. The Unit No. 1 (Engine 1) VOC stack exhaust concentration measured during the annual Rule 1110.2 compliance testing was 3.24 ppmv. This is in the same range of the VOC concentrations measured during the pilot testing period, confirming the effectiveness of the catalytic oxidizer in removing VOC from the engine exhaust.

**Table 2:  
Annual Rule 1110.2 Compliance Test VOC Concentrations - Plant No. 1**

Date	Unit No. (Engine)	Sampling Method	Stack Exhaust (ppmv)
1/13/2011	1	SCAQMD Method 25.3	3.24
1/12/2011	2	SCAQMD Method 25.1	97.2
1/11/2011	3	SCAQMD Method 25.1	96.9

- Note: 1. All concentrations are adjusted to 15% O<sub>2</sub>.

As discussed earlier, the DGCS was installed on the digester gas header and provides cleaned digester gas fuel to all three IC engines. The Cat Ox/SCR post-combustion control was installed on Engine 1, but not on Unit Nos. 2 and 3 (Engines 2 and 3). As shown in Table 2, the VOC stack exhaust concentrations for Engines 2 and 3 were 97.2 and 96.9 ppmv, respectively. This was much higher than the VOC concentrations measured at the Engine 1 exhaust before the Cat Ox/SCR system during the pilot testing period, which averaged 21.84 ppmv VOCs. One possible explanation to this is the arrangement of the sampling port at Engine No. 1 before the catalytic oxidizer. Due to restrictions on placement of the Method 25.3 probe at the Engine No. 1 exhaust before the Cat Ox/SCR system, accuracy in taking this sample is reduced. Typically using sampling Method SCAQMD 25.3, two samples are gathered from two separate probes and the results of the analyses are averaged. SCAQMD mandates that when the results from the two samples differ by more than 20%, that the higher value of the two samples be reported. In the experience of the SCEC lab, this occurs approximately half of the time. Otherwise, the values are averaged.

In this instance, the valve at the engine exhaust sampling port was not large enough to co-locate two probes next to each other and it was not possible to expand the sampling port. Therefore, the sample and duplicate sample were not taken at the same time, but one after the other. The data presented in Table 2 above for the engine exhaust represents the higher of the two sample data results, in line with AQMD's general mandate. Despite the lower accuracy in the engine exhaust sample, the sample taken at the stack exhaust met the SCAQMD accuracy criteria. Moving forward, it is recommended to install a larger sampling port to allow for greater accuracy through the co-location of the Method 25.3 probes.

### **Conclusions and Recommendations**

Upon review of the data from the five sampling events, it was determined that the catalytic oxidizer (with a DGCS) is successful in reducing the VOC concentration to below the emission limit of 30 ppmv in Amended Rule 1110.2. The catalytic oxidizer system met the vendor guarantee of 25 ppmvd VOCs. During the pilot testing period, the average VOC inlet concentration at the engine exhaust was 21.8 ppmv, and the average VOC outlet concentration at the stack exhaust was 3.6 ppmv. The VOC outlet concentration was confirmed during the OCSD Plant No. 1 annual permit compliance testing in January 2011 (see Table 2).

During the annual permit compliance testing in January 2011, it was also found that the VOC concentration at the Engine Nos. 2 and 3 Stack Exhaust were 97.2 ppmv and 96.9 ppmv, respectively. This is much higher than that measured at the Engine No. 1 exhaust before the catalytic oxidizer. This may have occurred due to restrictions with the Engine No. 1 exhaust sample port. In the future, it is recommended to install a larger sampling port at the engine exhaust.

### **References**

- 1 CARB, 1991. "Method 430 – Determination of Formaldehyde and Acetaldehyde in Emissions from Stationary Sources." December 1991.
- 2 EPA, 2003. "Appendix A to Part 63 – Test Methods. Method 323 – Measurement of Formaldehyde Emissions from Natural Gas-Fired Stationary Sources – Acetyl Acetone Derivatization Method." Federal Register, Vol. 68, No. 9, January 14, 2003.
- 3 SCAQMD, 2000. "Method 25.3 – Determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Clean Fueled Combustion Sources." March 2000.

**APPENDIX C-3:**  
**CEMS Emissions Summary**

Validated Daily 15-Minute Block Average  
Daily Average and Maximum Emissions Summary Data from CEMS  
Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
4/1/2010	33.49	-	6.20	-	44.32	-	8.97	96.13	113.65	0%	Note 1.
4/2/2010	31.28	-	5.70	-	34.35	-	6.28	96.84	100.74	96%	Note 1.
4/3/2010	30.16	-	5.75	-	31.61	-	6.24	97.55	101.02	91%	Note 1.
4/4/2010	30.05	-	5.82	-	32.05	-	6.33	96.80	103.18	83%	Note 1.
4/5/2010	33.96	-	5.84	-	36.08	-	6.31	95.15	101.43	90%	Note 1.
4/6/2010	34.03	-	5.78	-	37.00	-	6.73	94.82	100.79	74%	Note 1.
4/7/2010	35.47	-	5.58	-	38.97	-	6.08	96.88	105.06	96%	Note 1.
4/8/2010	32.89	-	5.93	-	37.44	-	7.87	91.57	101.69	94%	Note 1.
4/9/2010	31.93	-	5.78	-	33.69	-	6.28	97.27	100.60	96%	Note 1.
4/10/2010	31.49	-	5.93	-	33.18	-	6.34	96.90	100.78	92%	Note 1.
4/11/2010	30.94	-	6.04	-	33.04	-	6.55	94.72	99.67	91%	Note 1.
4/12/2010	31.69	-	6.05	-	34.34	-	6.71	88.29	96.25	88%	Note 1.
4/13/2010	33.11	-	5.95	-	37.06	-	6.53	88.30	98.81	90%	Note 1.
4/14/2010	31.98	-	5.87	-	35.12	-	6.31	95.47	100.75	89%	Note 1.
4/15/2010	31.09	-	5.98	-	34.46	-	6.37	97.02	100.38	90%	Note 1.
4/16/2010	31.36	-	5.95	-	33.19	-	6.26	96.80	100.46	92%	Note 1.
4/17/2010	30.94	-	5.92	-	32.69	-	6.25	97.66	104.81	93%	Note 1.
4/18/2010	30.70	-	5.95	-	34.11	-	6.47	95.54	100.86	95%	Note 1.
4/19/2010	30.28	-	6.09	-	33.10	-	6.81	90.86	99.29	88%	Note 1.
4/20/2010	29.62	-	6.10	-	33.35	-	6.44	83.53	93.10	90%	Note 1.
4/21/2010	33.03	-	5.61	-	34.76	-	5.88	95.39	100.22	93%	Note 1.
4/22/2010	33.03	-	5.62	-	35.49	-	5.91	97.64	100.88	96%	Note 1.
4/23/2010	33.73	-	5.87	-	35.89	-	7.05	96.10	100.84	96%	Note 1.
4/24/2010	33.49	-	5.98	-	35.68	-	6.15	97.92	102.18	96%	Note 1.
4/25/2010	30.79	-	6.18	-	32.34	-	6.54	96.58	100.34	91%	Note 1.
4/26/2010	30.40	-	6.22	-	32.20	-	6.75	92.60	99.67	86%	Note 1.
4/27/2010	31.10	-	6.13	-	32.92	-	6.83	95.33	101.54	86%	Note 1.
4/28/2010	32.11	-	6.19	-	36.67	-	7.37	93.53	102.53	53%	Note 1.
4/29/2010	35.53	-	5.67	-	38.83	-	6.40	98.71	107.61	96%	Note 1.
4/30/2010	34.85	-	5.58	-	37.68	-	5.79	103.15	106.09	96%	Note 1.
5/1/2010	32.93	-	5.78	-	34.68	-	6.00	102.47	106.53	96%	Note 1.
5/2/2010	34.26	-	5.81	-	36.48	-	6.25	102.95	106.06	92%	Note 1.
5/3/2010	34.39	-	6.18	-	42.06	-	9.72	96.31	105.57	53%	Note 1.
5/4/2010	32.80	-	5.97	-	34.46	-	6.53	92.11	100.49	0%	Note 1.
5/5/2010	26.49	-	4.80	-	27.54	-	5.18	83.99	92.92	0%	Note 1.
5/6/2010	32.64	-	5.19	-	35.45	-	5.81	102.76	106.54	0%	Note 1.
5/7/2010	32.33	-	5.52	-	34.26	-	5.96	103.38	107.95	96%	Note 1.
5/8/2010	32.14	-	5.66	-	34.01	-	6.13	103.18	106.94	85%	Note 1.
5/9/2010	31.33	-	5.82	-	36.50	-	6.30	96.36	105.53	89%	Note 1.
5/10/2010	31.77	-	5.76	-	36.68	-	7.46	85.73	98.86	86%	Note 1.
5/11/2010	33.55	-	5.59	-	38.04	-	6.35	97.79	106.06	89%	Note 1.
5/12/2010	32.02	-	5.73	-	37.30	-	6.66	102.01	106.44	55%	Note 1.
5/13/2010	31.47	-	5.93	-	33.54	-	6.54	97.90	106.97	0%	Note 1.
5/14/2010	33.74	-	5.68	-	35.92	-	5.94	102.47	107.02	87%	Note 1.
5/15/2010	34.32	-	5.74	-	36.26	-	5.92	102.79	106.02	87%	Note 1.
5/16/2010	32.94	-	5.77	-	35.24	-	6.25	103.30	106.55	87%	Note 1.
5/17/2010	32.28	-	5.75	-	34.83	-	6.31	100.58	105.76	94%	Note 1.
5/18/2010	30.24	-	5.90	-	34.62	-	6.57	100.79	106.94	96%	Note 1.
5/19/2010	30.15	-	5.85	-	31.65	-	6.68	101.48	107.08	86%	Note 1.
5/20/2010	31.29	-	5.88	-	34.10	-	6.42	103.01	107.64	90%	Note 1.
5/21/2010	30.16	-	6.12	-	33.08	-	6.66	102.86	107.93	96%	Note 1.
5/22/2010	32.54	-	5.84	-	35.08	-	6.09	103.12	106.52	90%	Note 1.
5/23/2010	34.07	-	5.90	-	36.53	-	6.40	102.80	107.51	93%	Note 1.
5/24/2010	32.96	-	5.99	-	36.36	-	6.39	102.46	109.29	90%	Note 1.
5/25/2010	30.21	-	5.98	-	33.13	-	6.43	98.64	107.62	91%	Note 1.

Validated Daily 15-Minute Block Average  
Daily Average and Maximum Emissions Summary Data from CEMS  
Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
5/26/2010	31.18	-	6.06	-	33.84	-	6.44	101.02	107.79	90%	Note 1.
5/27/2010	32.54	-	6.62	-	42.79	-	7.39	107.57	116.77	0%	Note 1.
5/28/2010	32.54	-	7.13	-	36.76	-	7.87	108.29	112.89	90%	Note 1.
5/29/2010	33.32	-	7.21	-	38.06	-	8.14	108.48	113.00	90%	Note 1.
5/30/2010	32.29	-	7.14	-	37.57	-	7.81	105.35	111.41	95%	Note 1.
5/31/2010	32.38	-	7.09	-	34.35	-	7.85	102.68	110.76	93%	Note 1.
6/1/2010	32.12	-	7.08	-	34.42	-	7.70	99.23	106.01	91%	Note 1.
6/2/2010	32.10	-	7.12	-	35.69	-	7.82	99.22	109.84	92%	Note 1.
6/3/2010	32.60	-	7.21	-	35.06	-	7.62	102.76	106.04	90%	Note 1.
6/4/2010	31.77	-	7.65	-	34.64	-	8.26	102.72	107.91	90%	Note 1.
6/5/2010	30.68	-	8.03	-	33.03	-	8.47	102.76	106.89	0%	Note 1.
6/6/2010	31.73	-	8.66	-	33.23	-	9.22	103.14	106.57	90%	Note 1.
6/7/2010	29.42	-	8.50	-	34.22	-	10.27	92.20	107.57	87%	Note 1.
6/8/2010	28.04	3.67	8.82	5.25	30.71	6.70	10.15	89.57	106.09	93%	Urea injection set points modified to reduce ammonia slip.
6/9/2010	29.08	5.14	11.05	1.75	30.72	6.98	12.65	100.68	108.52	90%	
6/10/2010	29.03	4.96	14.33	1.38	32.07	6.50	17.45	103.62	107.96	90%	
6/11/2010	35.28	8.58	14.73	3.66	39.35	10.49	17.69	88.07	107.98	0%	
6/12/2010	35.15	8.40	13.39	2.46	41.26	13.87	16.32	87.35	104.66	0%	Engine operated on Natural Gas from 17:26 to 17:31.
6/13/2010	28.12	4.80	10.94	1.31	30.63	6.24	12.90	92.08	101.85	96%	
6/14/2010	27.52	4.87	9.13	1.21	29.15	6.22	9.61	85.14	94.49	54%	The CEMS failed calibration repeatedly (both NOx and CO low range were out of control). Adjustments were made to bring it back into calibration (Note 2).
6/15/2010	28.04	4.60	9.54	1.12	32.15	6.77	11.00	91.91	99.76	87%	
6/16/2010	30.75	5.59	9.59	1.13	35.26	7.78	10.36	97.30	107.73	81%	
6/17/2010	30.87	5.62	9.92	1.15	34.07	7.32	10.61	103.26	105.74	96%	
6/18/2010	29.87	4.94	9.90	0.97	31.55	6.03	10.60	101.24	105.90	96%	
6/19/2010	31.23	6.02	9.03	1.34	33.29	7.23	9.56	97.62	101.06	96%	
6/20/2010	32.09	6.44	8.69	1.74	34.59	7.71	9.19	97.83	102.80	96%	
6/21/2010	34.17	7.36	8.40	1.69	36.50	9.06	9.07	99.29	103.92	91%	
6/22/2010	33.88	7.24	8.42	2.15	37.69	8.89	9.11	98.75	106.15	90%	
6/23/2010	33.03	6.83	8.28	2.11	36.24	8.99	9.10	97.58	104.97	94%	
6/24/2010	32.86	6.89	8.65	2.40	36.61	9.15	9.41	102.87	106.83	96%	Urea injection shut off for urea delivery and level sensor calibration from 8:08 to 9:22 (Note 3).
6/25/2010	32.53	6.83	8.91	2.09	34.24	7.73	9.31	103.43	106.78	92%	
6/26/2010	33.67	7.61	8.40	3.11	38.08	8.94	8.93	103.06	105.96	94%	
6/27/2010	33.46	7.88	8.21	4.39	38.36	8.96	8.89	103.32	106.45	98%	CEMS inlet sample flow alarm occurred causing invalid data. CEMTEK technician responded and found sample pump to be in need of a rebuild. Necessary repairs were made.
6/28/2010	34.80	7.67	8.38	2.47	36.82	9.10	8.98	103.11	106.70	98%	
6/29/2010	34.16	7.61	8.46	1.98	36.75	8.95	9.29	103.41	108.30	93%	
6/30/2010	34.39	7.83	8.09	3.01	37.94	10.29	9.57	99.16	110.60	85%	
7/1/2010	34.16	7.43	7.83	2.14	35.40	8.14	7.91	93.56	95.94	92%	
7/2/2010	N/A	N/A	N/A	N/A	0.00	N/A	N/A	N/A	N/A	0%	The engine experience high NOx inlet at the engine exhaust due to a new automation issue, which in turn caused high NOx at the stack outlet (Note 4).
7/3/2010	N/A	N/A	N/A	N/A	0.00	N/A	N/A	N/A	N/A	0%	
7/4/2010	36.43	8.74	8.02	2.06	39.94	10.37	9.18	99.37	105.85	90%	
7/5/2010	35.95	8.30	8.13	2.37	39.78	10.33	9.24	100.91	105.97	89%	
7/6/2010	34.81	7.86	7.80	2.21	38.84	9.78	9.13	97.97	105.00	0%	Note 2.
7/7/2010	33.89	7.49	7.47	2.68	37.70	9.38	8.32	93.48	100.26	92%	
7/8/2010	32.69	6.79	8.18	1.86	36.29	8.77	9.23	97.97	107.36	83%	
7/9/2010	32.07	6.43	8.70	1.32	34.42	7.76	9.33	97.63	99.70	83%	
7/10/2010	32.57	6.70	8.22	1.68	35.97	8.18	9.27	97.70	101.85	83%	
7/11/2010	31.92	6.56	8.09	1.56	36.21	8.52	9.15	92.72	99.52	87%	
7/12/2010	32.69	7.23	7.72	1.86	37.08	9.47	8.95	90.23	97.66	89%	
7/13/2010	33.00	7.19	7.79	2.12	36.37	8.91	8.93	96.10	101.79	88%	
7/14/2010	33.28	7.38	7.71	2.04	38.59	10.02	8.82	93.08	99.29	91%	
7/15/2010	33.49	7.34	7.93	2.26	37.32	9.50	8.58	98.93	103.17	97%	
7/16/2010	31.95	6.75	8.23	1.67	33.71	7.98	8.88	98.17	103.58	87%	

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Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
7/17/2010	33.16	7.43	7.87	2.39	37.15	9.46	9.08	93.85	105.06	89%	
7/18/2010	32.37	7.02	7.83	2.02	35.65	9.00	8.90	94.85	101.40	90%	
7/19/2010	32.74	7.22	7.91	2.46	36.69	9.50	9.16	95.15	101.60	88%	
7/20/2010	32.05	6.86	7.80	39.38	36.12	10.44	11.46	94.30	100.26	0%	The engine was brought offline at the request of the OCSd's contractor who is performing electrical upgrades (Note 2).
7/21/2010	32.46	6.85	7.99	1.88	34.65	7.73	8.99	98.29	102.81	94%	
7/22/2010	32.78	6.99	7.97	2.15	35.41	8.30	9.11	95.07	102.88	87%	
7/23/2010	30.76	5.96	8.36	1.75	33.43	7.40	9.44	95.39	99.27	87%	
7/24/2010	31.02	6.42	8.42	7.59	34.77	9.33	42.23	93.60	118.80	0%	Note 2.
7/25/2010	32.71	6.94	8.02	3.26	37.17	9.35	9.29	97.57	102.19	89%	
7/26/2010	34.25	7.62	7.55	100.43	41.43	9.23	8.48	96.06	107.34	0%	Note 2.
7/27/2010	32.69	6.99	7.57	2.16	38.25	9.15	8.49	92.14	99.98	87%	
7/28/2010	32.15	6.88	7.74	3.47	35.77	8.68	9.26	93.20	112.96	0%	Note 2.
7/29/2010	32.04	7.22	6.61	2.48	34.72	8.63	8.44	93.08	99.08	0%	Note 2.
7/30/2010	30.92	6.71	6.38	2.07	32.76	7.60	6.67	94.17	101.75	90%	
7/31/2010	30.03	6.34	6.48	2.73	31.93	7.27	7.61	92.62	100.70	90%	
8/1/2010	30.79	6.69	6.64	2.84	33.38	8.17	7.67	93.19	104.33	90%	
8/2/2010	31.93	7.34	6.42	2.42	36.03	9.55	7.36	91.59	97.50	89%	
8/3/2010	32.58	7.68	6.26	25.61	36.79	9.42	7.44	92.77	99.37	0%	Note 2.
8/4/2010	32.44	7.78	6.18	10.42	34.43	9.34	7.31	94.30	98.94	0%	Note 2.
8/5/2010	31.95	7.25	6.51	3.20	35.74	9.00	13.21	89.75	99.70	0%	Note 2. High Stack Exhaust NOx due to Natural Gas fuel.
8/6/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
8/7/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
8/8/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	Engine was offline from 8/5/10 16:09 through 8/11/10 7:48.
8/9/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
8/10/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
8/11/2010	34.39	9.27	6.08	3.49	37.74	10.98	6.88	90.62	95.53	0%	Note 2.
8/12/2010	34.01	8.74	6.41	3.19	37.25	10.07	7.49	93.14	102.71	0%	
8/13/2010	32.57	8.41	6.40	3.06	37.04	11.15	7.02	85.86	97.19	97%	
8/14/2010	33.00	8.53	6.38	3.91	37.21	10.60	7.03	86.13	92.47	96%	
8/15/2010	31.66	7.74	6.73	3.24	35.65	9.73	7.53	86.67	94.22	84%	
8/16/2010	32.48	8.43	6.52	3.42	37.09	11.79	7.34	82.17	86.64	0%	Note 2.
8/17/2010	32.96	8.93	6.48	3.45	37.66	11.46	7.01	84.22	91.31	0%	Note 2.
8/18/2010	34.78	9.68	6.46	4.98	40.13	12.49	6.99	90.49	97.30	0%	High Stack Exhaust NOx due to Natural Gas fuel.
8/19/2010	33.37	8.98	6.70	3.88	37.98	12.01	7.22	90.84	105.13	0%	High Stack Exhaust NOx due to Natural Gas fuel.
8/20/2010	33.29	8.98	6.55	5.40	38.36	11.54	7.31	91.00	95.18	90%	High Stack Exhaust NOx due to Natural Gas fuel.
8/21/2010	33.27	8.80	6.63	5.09	37.79	10.62	7.58	92.52	96.82	88%	
8/22/2010	32.57	8.36	6.71	4.44	37.77	11.61	7.57	90.78	98.04	87%	
8/23/2010	32.37	8.33	6.80	5.17	38.56	12.47	7.69	86.52	107.28	87%	
8/24/2010	29.99	7.10	6.83	3.93	37.32	12.07	7.72	80.59	105.53	0%	High Stack Exhaust NOx due to Natural Gas fuel.
8/25/2010	30.34	7.17	6.62	4.24	37.22	11.50	7.48	85.12	107.70	0%	High Stack Exhaust NOx due to Natural Gas fuel.
8/26/2010	29.45	6.37	6.92	3.98	34.92	9.43	7.51	87.33	105.39	86%	
8/27/2010	29.78	6.58	6.82	3.11	35.83	9.86	7.57	86.61	103.34	84%	
8/28/2010	30.79	7.18	6.75	3.30	36.03	10.15	7.15	86.40	100.08	90%	
8/29/2010	30.77	7.03	6.85	4.73	36.72	10.26	7.82	85.69	100.49	84%	
8/30/2010	29.61	6.07	7.11	1.88	35.04	9.48	8.06	79.22	99.68	0%	Note 2.
8/31/2010	29.05	5.76	7.07	5.45	35.34	9.77	7.77	78.41	97.15	0%	Note 2.
9/1/2010	33.39	8.60	6.69	4.19	40.53	14.28	7.51	87.49	106.41	84%	
9/2/2010	32.65	8.22	6.77	6.03	39.58	13.23	7.54	84.66	99.47	84%	
9/3/2010	32.90	8.40	6.63	8.72	39.26	12.82	7.07	89.29	109.77	91%	
9/4/2010	33.26	8.65	6.61	5.38	38.50	11.94	7.43	90.48	107.93	86%	
9/5/2010	30.00	6.86	7.14	2.32	35.04	9.24	7.90	83.59	99.00	72%	
9/6/2010	29.93	6.56	7.48	1.93	32.05	7.69	7.98	80.49	90.32	69%	
9/7/2010	31.27	7.36	7.27	2.65	33.15	8.54	7.75	79.44	83.96	71%	
9/8/2010	35.14	9.79	6.52	5.14	42.28	15.88	7.21	87.84	107.84	90%	

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Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
9/9/2010	32.88	9.10	6.51	11.65	41.40	13.94	7.21	91.86	107.79	91%	
9/10/2010	31.34	8.32	6.78	6.44	37.96	12.85	7.26	91.29	108.76	90%	
9/11/2010	29.43	7.26	6.89	4.87	33.60	9.66	7.51	86.16	105.12	86%	
9/12/2010	28.30	6.60	7.12	3.58	32.01	8.68	7.70	84.15	100.06	84%	
9/13/2010	28.95	6.89	7.27	3.96	33.22	9.30	7.90	82.00	97.27	78%	
9/14/2010	29.73	7.52	7.10	4.40	38.04	13.94	9.50	84.29	99.48	22%	
9/15/2010	31.12	8.14	6.94	5.71	35.50	11.23	7.39	96.23	108.48	92%	
9/16/2010	31.08	8.35	6.84	7.25	39.84	15.22	7.35	93.14	108.14	82%	
9/17/2010	31.23	8.67	6.76	6.46	36.62	11.98	9.99	91.46	110.09	0%	
9/18/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	Engine was offline from 9/17/10 17:04 through 9/20/10 8:32.
9/19/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
9/20/2010	31.34	7.02	7.65	2.28	32.94	7.66	9.02	71.18	73.79	0%	Note 2.
9/21/2010	26.63	5.42	6.19	2.28	27.52	6.25	7.07	75.34	78.16	0%	Note 2.
9/22/2010	31.30	8.83	6.33	6.79	36.26	13.07	6.92	93.35	108.12	95%	
9/23/2010	31.26	8.62	6.52	6.13	36.23	12.79	7.10	96.28	108.32	98%	
9/24/2010	28.18	6.71	6.84	4.96	33.98	10.56	7.30	93.68	108.80	90%	
9/25/2010	27.04	6.35	6.68	3.71	29.74	8.06	7.15	83.96	103.31	92%	
9/26/2010	27.99	6.91	6.57	6.63	31.71	9.43	7.21	80.01	92.42	94%	
9/27/2010	28.73	7.14	6.69	4.94	34.90	12.61	7.70	81.03	97.24	85%	
9/28/2010	27.94	6.54	6.96	7.53	34.81	11.63	7.62	75.23	86.85	84%	
9/29/2010	28.91	7.65	6.80	9.74	33.59	10.20	7.48	81.73	91.75	81%	
9/30/2010	29.53	8.16	6.47	7.19	36.18	13.61	6.91	93.46	106.94	90%	
10/1/2010	27.07	6.68	6.58	5.20	29.46	8.08	7.00	83.91	92.78	89%	
10/2/2010	26.23	6.11	6.62	7.69	31.27	9.76	7.11	85.34	108.61	91%	
10/3/2010	25.86	5.71	6.65	3.04	28.55	7.08	7.14	82.10	98.20	90%	
10/4/2010	28.04	6.72	6.90	8.24	32.57	9.05	8.18	74.60	87.54	89%	
10/5/2010	28.81	6.89	6.83	7.19	33.02	10.71	8.00	72.84	83.41	89%	
10/6/2010	29.44	7.30	6.59	5.16	33.33	9.77	7.30	76.33	90.18	94%	
10/7/2010	29.43	7.25	6.66	14.29	32.75	9.50	7.31	76.26	91.66	95%	
10/8/2010	28.77	7.11	6.51	3.99	33.08	9.84	7.05	79.63	93.66	96%	
10/9/2010	28.78	7.31	6.47	4.17	32.12	9.47	6.90	85.42	99.26	98%	
10/10/2010	27.43	6.54	6.36	4.29	31.20	8.63	6.86	84.93	103.80	98%	
10/11/2010	27.52	6.30	6.45	3.76	33.05	8.60	7.23	79.05	101.14	93%	
10/12/2010	26.54	N/A	6.40	N/A	29.19	N/A	6.83	76.03	86.49	0%	
10/13/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/14/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/15/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/16/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/17/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/18/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/19/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/20/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/21/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	Engine was shut down at 8:40 due to lack of low range calibration gas for the Stack Exhaust CEMS monitor. Data is missing from 16:02 to 17:06.
10/22/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/23/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/24/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/25/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/26/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/27/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/28/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/29/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/30/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
10/31/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
11/1/2010	28.67	6.50	7.49	3.13	31.86	9.42	8.49	75.34	96.94	0%	Note 2.
11/2/2010	28.19	6.54	7.54	4.81	33.32	9.67	8.06	74.82	83.23	89%	



Validated Daily 15-Minute Block Average  
Daily Average and Maximum Emissions Summary Data from CEMS  
Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
11/3/2010	30.47	8.48	7.30	6.92	34.59	10.70	8.08	84.85	107.53	95%	
11/4/2010	31.14	8.99	7.19	7.27	34.38	10.70	7.68	91.85	109.16	93%	
11/5/2010	30.89	8.88	7.14	5.73	34.94	11.50	8.30	89.41	105.72	98%	
11/6/2010	28.41	7.19	7.19	6.18	32.85	10.10	8.08	85.70	96.36	88%	
11/7/2010	28.75	7.39	7.16	4.18	33.17	9.76	8.08	87.11	104.47	90%	
11/8/2010	30.20	8.10	6.93	5.35	37.51	13.37	8.61	90.50	105.21	48%	
11/9/2010	29.42	7.56	6.90	5.04	32.09	9.39	7.46	81.89	96.84	88%	
11/10/2010	27.07	6.11	7.01	2.81	29.85	8.39	7.61	79.84	97.91	92%	
11/11/2010	31.51	8.89	6.60	7.53	36.58	13.76	7.47	83.93	94.48	92%	
11/12/2010	31.50	8.90	6.86	5.30	37.28	13.42	7.62	88.38	102.32	98%	
11/13/2010	30.19	8.12	6.83	7.52	32.92	9.48	7.38	88.97	98.93	92%	
11/14/2010	28.00	6.92	7.06	6.65	32.41	8.95	7.98	80.73	91.53	90%	
11/15/2010	29.03	7.45	6.94	5.45	33.72	10.72	7.72	80.10	92.11	86%	
11/16/2010	28.04	7.06	6.87	3.45	43.68	13.94	7.92	88.64	102.38	0%	Note 2.
11/17/2010	24.94	5.16	7.08	1.84	26.49	6.38	7.76	82.87	89.68	0%	Note 2.
11/18/2010	25.33	5.25	7.09	4.72	28.62	7.14	7.74	83.83	102.51	0%	Note 2.
11/19/2010	26.67	6.58	7.00	4.28	32.24	12.23	7.82	84.51	95.55	73%	
11/20/2010	26.91	6.40	6.92	3.96	32.90	10.08	7.68	88.49	95.64	90%	
11/21/2010	26.92	6.21	7.00	3.63	31.24	8.02	7.93	79.79	91.55	91%	
11/22/2010	28.97	7.23	6.83	3.81	32.02	8.49	7.64	80.99	98.00	94%	
11/23/2010	28.19	6.83	6.65	3.49	31.73	9.26	7.24	84.08	97.69	98%	
11/24/2010	29.29	7.56	6.63	7.10	33.61	9.78	7.18	90.65	106.51	98%	
11/25/2010	31.81	8.98	6.51	5.52	34.83	10.43	7.06	90.37	96.97	0%	Note 2.
11/26/2010	33.06	9.83	6.51	5.39	36.68	12.59	7.11	90.34	100.05	94%	
11/27/2010	31.95	9.09	6.49	7.26	36.87	11.96	7.01	88.59	97.10	92%	
11/28/2010	31.77	8.99	6.55	7.36	35.35	11.16	7.46	85.58	96.93	93%	
11/29/2010	30.94	8.22	6.68	3.65	34.51	9.98	7.49	83.60	97.89	0%	
11/30/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/1/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/2/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/3/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/4/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/5/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/6/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/7/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/8/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/9/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/10/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/11/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/12/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/13/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/14/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/15/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/16/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/17/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/18/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/19/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/20/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/21/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/22/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/23/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/24/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/25/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/26/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/27/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	

Engine offline on 11/29/10 at 15:29 through 12/29/10 at 11:57.

Validated Daily 15-Minute Block Average  
Daily Average and Maximum Emissions Summary Data from CEMS  
Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
12/28/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/29/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	NOx probe at Engine Exhaust offline. The engine was not out of compliance and continued to run despite high NOx at the stack exhaust.
12/30/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
12/31/2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
1/1/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	After restart of the system on 12/29/10, plant operators had isolated and not checked the urea injection system. Once checked, the urea supply line was isolated, the urea pump noisy, the air supply to the injection lance was isolated, and the urea filter housing was leaking. Johnson Matthey replaced the #1 urea pump on 1/13/11 (Note 4).
1/2/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
1/3/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
1/4/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
1/5/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	Engine offline to relocate engine exhaust NOx probe and replace umbilical line.
1/6/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
1/7/2011	31.43	7.75	7.43	3.34	32.61	8.39	7.76	104.77	107.37	96%	Urea injection was not turned on until 1 hour after engine start-up, data for the hour when the urea system was not online plus 30 minutes of start-up time is excluded from the data set (Note 3).
1/8/2011	31.05	7.35	7.63	2.57	32.70	8.42	8.05	102.22	106.83	95%	
1/9/2011	30.36	7.13	7.16	1.87	33.10	9.12	7.84	88.25	103.01	90%	
1/10/2011	30.98	7.45	7.02	2.26	34.84	9.52	7.50	84.08	96.68	94%	
1/11/2011	32.83	8.21	7.13	2.66	38.26	12.38	7.97	93.99	109.26	85%	
1/12/2011	31.94	7.33	7.70	1.96	34.05	9.25	8.22	100.93	107.27	96%	
1/13/2011	30.20	6.29	7.72	1.79	32.40	7.88	8.77	95.71	108.38	96%	
1/14/2011	32.85	7.97	7.59	2.64	35.06	9.50	8.06	104.41	108.41	96%	
1/15/2011	31.76	7.65	7.52	2.30	34.36	9.47	8.40	99.59	108.97	95%	
1/16/2011	30.89	7.16	8.14	2.01	32.24	8.08	8.73	103.93	110.94	98%	
1/17/2011	29.99	6.82	7.76	2.13	35.39	9.30	8.56	96.90	105.58	81%	
1/18/2011	29.70	6.77	7.59	2.49	32.44	8.50	8.38	94.12	106.01	90%	
1/19/2011	27.21	4.94	7.35	1.59	31.53	7.73	8.14	84.34	103.41	93%	
1/20/2011	30.55	7.39	7.21	13.98	35.22	11.59	7.93	86.34	101.04	91%	
1/21/2011	29.15	6.87	7.51	3.58	33.64	9.89	8.38	87.00	93.08	98%	
1/22/2011	26.97	5.23	7.45	1.60	30.15	7.37	8.44	85.37	96.58	97%	
1/23/2011	29.30	6.81	7.15	2.33	32.08	8.56	7.96	84.82	96.24	98%	
1/24/2011	29.55	6.73	7.01	2.49	32.13	8.12	8.05	78.79	92.24	87%	
1/25/2011	29.54	6.13	7.54	2.68	32.04	7.78	8.41	70.52	85.60	70%	
1/26/2011	31.52	7.78	6.99	3.18	34.94	9.54	8.05	87.50	108.13	86%	
1/27/2011	30.33	7.41	7.15	2.34	33.96	8.76	7.77	86.61	106.21	96%	
1/28/2011	29.42	6.73	7.56	2.37	32.77	8.88	8.16	92.70	107.40	96%	
1/29/2011	26.64	4.59	7.83	0.96	29.23	6.26	8.37	88.57	97.08	96%	
1/30/2011	26.98	5.02	7.08	1.03	28.37	6.04	7.56	80.00	86.47	94%	
1/31/2011	28.13	5.45	7.26	2.24	36.23	10.64	8.80	75.28	91.23	77%	
2/1/2011	28.53	5.75	7.32	2.79	32.14	7.92	8.48	73.98	84.95	87%	
2/2/2011	33.07	7.86	7.06	5.22	38.46	11.02	8.07	71.26	78.57	88%	
2/3/2011	29.41	6.08	7.14	1.60	32.47	7.39	7.71	80.11	87.92	94%	
2/4/2011	28.76	5.60	7.90	1.42	32.21	7.37	8.90	92.09	104.87	93%	
2/5/2011	27.35	5.33	7.83	0.93	29.39	6.31	8.46	88.44	96.01	91%	
2/6/2011	26.70	4.30	7.87	2.09	28.72	6.37	8.61	80.20	84.32	83%	
2/7/2011	28.87	6.01	7.70	1.25	30.14	7.24	8.18	80.59	84.04	0%	
2/8/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	Engine offline 2/7/11 9:48 to 2/14/11 17:08 to change DGCS carbon media.
2/9/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
2/10/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
2/11/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
2/12/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
2/13/2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	
2/14/2011	29.60	7.32	6.76	5.31	31.62	10.02	7.71	90.54	97.53	0%	
2/15/2011	29.97	7.00	7.40	2.70	34.01	8.68	7.93	95.74	106.86	98%	Note 2.
2/16/2011	29.37	6.58	7.55	2.65	33.09	8.65	8.24	98.00	105.83	98%	
2/17/2011	32.25	8.07	7.48	3.30	34.04	9.81	8.23	104.74	111.50	98%	
2/18/2011	31.24	7.53	7.82	2.31	33.91	9.15	8.54	106.56	111.92	98%	

Validated Daily 15-Minute Block Average  
Daily Average and Maximum Emissions Summary Data from CEMS  
Plant 1 - Catalytic Oxidizer and Selective Catalytic Reduction

Date	Avg. Engine Exhaust	Average Stack Exhaust		Maximum	Maximum Engine Exhaust	Maximum Stack Exhaust		Average Engine Load (%)	Max Engine Load (%)	Average Fuel Ratio (% DG)	Notes
	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)	Ammonia Slip	NOx @15% O2 (ppmvd)	NOx @15% O2 (ppmvd)	CO @15%O2 (ppmvd)				
2/19/2011	30.92	7.36	7.55	2.81	33.90	9.76	8.31	102.93	110.40	98%	
2/20/2011	29.65	6.85	7.06	2.09	32.21	8.18	7.83	91.32	103.02	96%	
2/21/2011	29.49	6.57	6.81	3.01	34.00	8.82	7.57	81.64	91.69	93%	
2/22/2011	29.82	6.69	6.69	1.67	32.47	8.87	7.38	82.92	94.52	98%	
2/23/2011	31.09	7.21	7.18	1.64	33.45	8.16	7.92	99.43	109.78	98%	
2/24/2011	31.65	7.30	7.47	1.73	34.03	8.36	8.49	102.95	110.44	98%	
2/25/2011	33.13	8.13	7.39	4.04	34.16	9.47	7.71	106.44	111.02	0%	
2/26/2011	31.50	7.57	7.07	2.48	33.15	8.55	7.76	101.16	110.09	98%	
2/27/2011	33.42	8.34	6.97	2.93	36.58	10.04	7.36	100.53	108.17	98%	
2/28/2011	31.80	7.81	6.86	3.10	36.29	9.77	7.51	90.10	107.79	95%	
3/1/2011	30.14	6.79	7.14	2.65	32.51	9.02	7.88	91.95	105.72	98%	
3/2/2011	29.41	6.16	7.89	2.23	37.66	8.02	8.71	97.69	107.61	0%	Note 2.
3/3/2011	27.86	5.47	8.17	1.59	29.72	6.73	8.74	96.80	107.33	94%	
3/4/2011	28.83	6.08	8.46	1.39	30.85	7.23	8.87	102.94	110.40	98%	
3/5/2011	29.09	6.35	8.42	2.79	31.91	8.58	9.06	102.87	109.47	98%	
3/6/2011	26.63	5.01	7.89	1.43	28.70	6.04	8.86	91.24	102.92	95%	
3/7/2011	27.81	6.04	7.38	3.36	32.91	9.41	8.20	89.45	100.37	98%	
3/8/2011	28.03	6.00	7.69	2.04	30.45	7.55	8.68	91.40	103.44	98%	
3/9/2011	27.70	5.78	7.74	1.63	28.67	6.37	8.21	91.79	96.55	0%	Note 2.
3/10/2011	26.98	5.87	7.92	2.28	28.96	7.08	8.73	93.76	101.35	0%	Note 2.
3/11/2011	27.73	6.20	7.84	2.26	29.32	7.36	8.68	93.95	102.83	98%	
3/12/2011	28.37	6.49	7.67	2.08	29.98	7.32	8.58	94.09	106.19	97%	
3/13/2011	28.04	6.55	7.24	2.32	30.87	7.94	7.92	86.38	94.42	96%	
3/14/2011	29.04	7.21	7.16	5.04	31.84	9.62	7.70	87.02	93.44	0%	High NOx at the stack exhaust was due to a plugged urea injection lance (Note 4).
3/15/2011	28.24	6.44	7.60	2.99	29.70	7.59	8.40	92.96	101.85	98%	
3/16/2011	28.44	6.31	8.23	3.16	30.97	7.93	8.93	102.24	112.00	0%	
3/17/2011	29.40	8.59	8.11	2.34	31.30	10.76	8.56	102.10	107.70	0%	High NOx at the stack exhaust was due to a plugged urea injection lance (Note 4).
3/18/2011	29.51	8.20	8.84	2.54	31.79	11.09	32.82	102.78	110.18	98%	
3/19/2011	29.74	8.35	8.26	1.65	30.91	9.75	8.78	104.74	110.34	98%	
3/20/2011	27.83	6.94	7.72	1.31	30.84	9.39	8.77	93.75	104.95	95%	
3/21/2011	28.21	7.40	7.07	1.89	32.24	11.51	7.72	86.26	93.65	96%	
3/22/2011	29.87	8.50	7.62	2.62	33.20	11.89	8.58	97.16	108.53	98%	High NOx at the stack exhaust was due to adjustments to the SCR system by the system vendor (Note 3).
3/23/2011	29.24	7.54	8.08	1.31	31.75	9.71	8.65	101.83	108.03	98%	
3/24/2011	30.65	8.85	7.80	1.82	33.25	11.38	8.64	104.13	111.30	98%	
3/25/2011	30.25	8.63	8.04	2.64	31.35	10.14	28.89	105.44	111.08	98%	
3/26/2011	29.18	7.42	7.68	1.61	31.17	9.73	8.31	102.28	109.88	97%	
3/27/2011	27.38	6.34	7.25	1.56	30.41	9.39	8.12	91.24	100.63	96%	
3/28/2011	28.92	7.97	6.98	1.78	30.98	9.74	7.51	91.25	100.68	98%	
3/29/2011	28.50	7.37	7.33	1.65	30.23	9.67	7.97	95.03	105.40	98%	
3/30/2011	29.35	8.24	7.90	2.25	31.85	11.35	8.37	103.55	110.65	98%	
3/31/2011	29.44	8.39	8.09	2.01	30.77	10.27	8.43	106.76	111.47	98%	

**Notes:**

- (1) Urea injection setpoints were modified on June 8, 2010. Therefore, stack exhaust NOx data prior to June 8, 2010 is not included in the analysis of the SCR system and is not provided in this table.
- (2) The first 30 minutes after start-up of the engine are exempt from Amended Rule 1110.2. Data was excluded where NOx at the stack exhaust exceeded 11 ppmvd during engine start-up.
- (3) Data was excluded where NOx at the stack exhaust exceeded 11 due to system adjustments to the urea injection system.
- (4) Data was excluded where operational issues occurred from 7/1/10-7/4/10, 12/29/10-1/4/11, 3/14/11, 3/17/11, and 3/22/11.
- (5) Values shown are average or maximum values (as indicated) for each calendar day and may not all occur at the same time within the day.
- (6) N/A indicates that data was not available because the engine was offline.

**APPENDIX C-4:**

**Technical Memorandum:  
OCSD Catalytic Oxidizer/SCR Pilot Study:  
Ammonia Sampling and Calculation Methods**

Date: July 31, 2011  
To: File  
From: Kit Liang ; Daniel Stepner, Malcolm Pirnie, WHI  
Re: OCSD Cat Ox/SCR Pilot Study: Ammonia Sampling and Calculation Methods  
Project No.: 0788-187

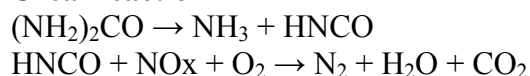
**Introduction**

To meet the South Coast Air Quality Management District (SCAQMD) Rule 1110.2 limit for oxides of nitrogen (NO<sub>x</sub>), the Orange County Sanitation District (OCSD) installed a urea-based selective catalytic reduction (SCR) system after the internal combustion (IC) engine exhaust and catalytic oxidizer (Cat Ox) at the Plant 1 Engine 1. The SCR system was designed to remove NO<sub>x</sub> through a chemical reaction between ammonia (provided by the urea (NH<sub>2</sub>)<sub>2</sub>CO)) and the NO<sub>x</sub> on the SCR catalyst surface. During this process, a small amount of unreacted free ammonia (NH<sub>3</sub>) or “*ammonia slip*” can be emitted into the exhaust gas. The objective of this memorandum is to discuss the reactions leading to ammonia slip, and a comparison of the different ammonia estimation methods.

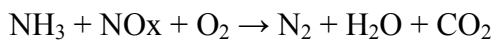
**SCR Overview**

SCR is an air pollution control method that reduces the NO<sub>x</sub> emissions resulting from fossil fuel combustion through a chemical reaction between the NO<sub>x</sub> in the exhaust stream and NH<sub>3</sub> provided by the injection of ammonia or urea. The reaction is facilitated by a catalyst to form nitrogen and water vapor.

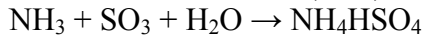
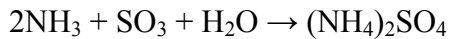
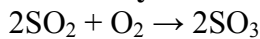
Engine 1 at OCSD Plant 1 is a four-stroke cycle engine, fueled with a blend of digester gas and natural gas. A Johnson Matthey® SCR system is located downstream of the engine and after a catalytic oxidizer. Aqueous urea is injected into the engine exhaust duct upstream of the SCR catalyst. Once urea is injected into the engine exhaust stream, it breaks down into ammonia and other constituents. Hydrolysis of the urea on the face of the catalyst generates more ammonia. This ammonia reagent reacts with the NO<sub>x</sub> in the stack emissions, and with the aid of a catalyst, reduces the NO<sub>x</sub> to harmless constituents: nitrogen, water vapor, and carbon dioxide. The ammonia can also react with sulfur dioxide (SO<sub>2</sub>) and sulfur trioxide (SO<sub>3</sub>) in secondary reactions to produce ammonium bisulfate (NH<sub>4</sub>HSO<sub>4</sub>) and ammonium sulfate ((NH<sub>4</sub>)<sub>2</sub>SO<sub>4</sub>). The equations for these reactions are as follows:

**Urea Reaction**

### **Ammonia Reaction**



### **Secondary Reactions:**



The ammonia/NO<sub>x</sub> reaction is optimal between 750°F and 850°F. The amount of NO<sub>x</sub> in the engine exhaust gas varies with the engine load, and fuel type or fuel blend (in this case, the proportion of digester gas and natural gas). In the SCR system, the injection of the urea is controlled based on process variables, including engine operation (on/off), engine load (i.e., process flow), and NO<sub>x</sub> concentration measured at the exhaust stack; and the quantity of urea to be injected is roughly proportional to the NO<sub>x</sub> being reduced and the volume of exhaust flow.

It is important not to inject more urea than necessary in order to keep the unreacted, unconsumed, free ammonia levels to a minimum. Excess free ammonia can occur when:

- Ammonia or urea, is over-injected into the exhaust stream,
- The temperature of the gas is too low for the ammonia to react, or
- The catalyst is degraded.

Significantly high levels of free ammonia in the exhaust stack gases can often be identified by a visible plume above the stack. Not only can the excess ammonia exceed permitted limits (ammonia is regulated by SCAQMD), but it also indicates that more ammonia or urea than needed was injected, resulting in a greater urea supply and storage capacity than actually needed to control the NO<sub>x</sub> emissions. In addition, compounds such as the sulfates formed in the secondary reactions presented above, in which free ammonia reacts with sulfur compounds, have been shown to result in the corrosion of downstream equipment and to cause line plugging. This has been discussed in the literature in particular for fuels with high sulfur content, such as coal. The general range of temperatures for the sulfate formation is reported to range from 390 to 450 °F for medium to low sulfur fuels.

### **Johnson Matthey® SCR Urea Control System**

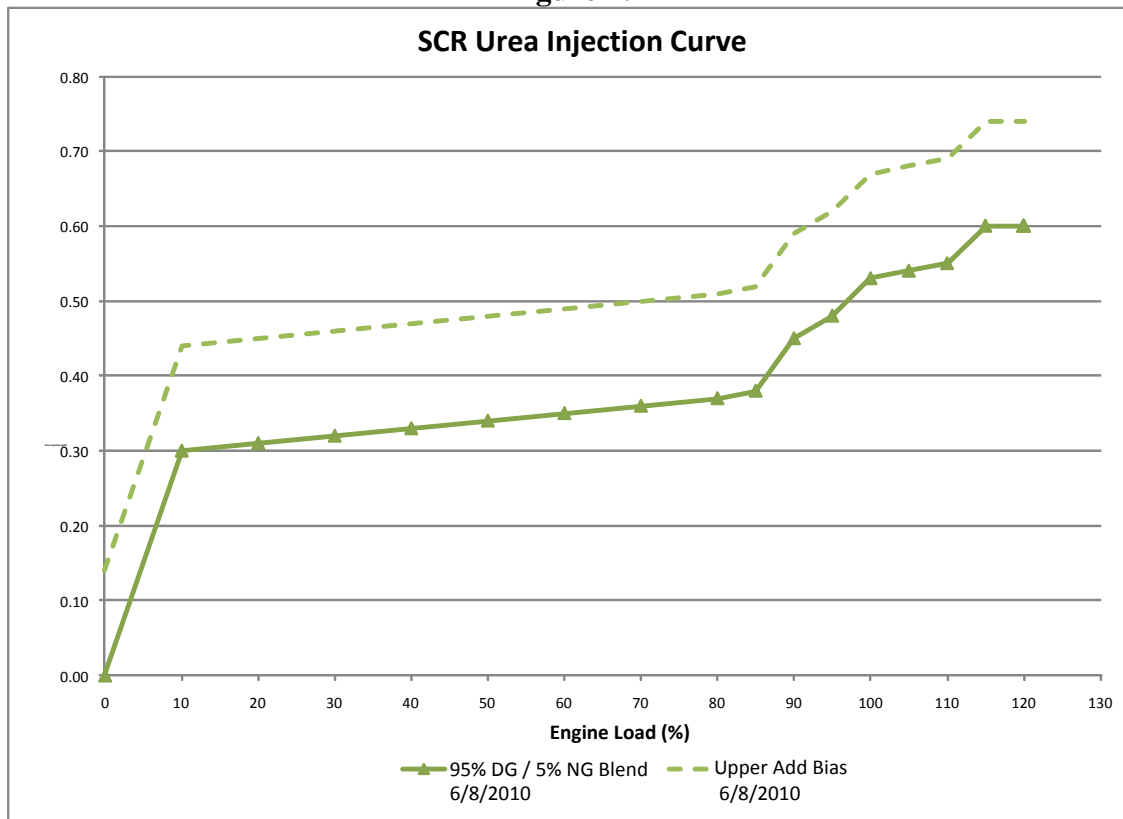
The goal of the SCR control system is to balance urea injection to reduce NO<sub>x</sub> concentration in the exhaust gas to below 11 ppm with a minimum amount of unconsumed or free ammonia. The maximum concentration of free ammonia allowed for this Pilot Study Research Permit is 10 ppm NH<sub>3</sub>.

The urea injection control system determines the correct rate of urea according to the engine load signal and the urea versus engine load map programmed into the control system. The load map, which correlates the urea injection rate to the engine load, was programmed during commissioning of the system by Johnson Matthey®. This load map allows the controller to interpolate between the prescribed load values and urea injection

rate to generate an overall curve of urea injection vs. engine load. As the engine is brought to load and as the engine load changes, urea flow rate is modulated by the flow control valve according to the determined urea injection rate. In addition to the load map control, the injection system also receives the NO<sub>x</sub> concentration at the stack outlet from the continuous emissions monitoring system (CEMS) stack exhaust NO<sub>x</sub> probe. This NO<sub>x</sub> signal is then used to increase the actual urea injection rate by a set percent *bias* as needed in order to fine tune the NO<sub>x</sub> emission rate.

As the engine was operated under varying loads during load mapping, Johnson Matthey® measured the NO<sub>x</sub> concentration with a portable chemiluminescent analyzer and the ammonia slip with Draeger® tubes at the SCR catalyst outlet. The purpose of these measurements was to develop a plot (map) of urea injection rate versus engine load that would meet NO<sub>x</sub> and ammonia slip emissions requirements. The urea injection rate versus engine load map is provided in Figure 1 below. The solid line represents the true set points for urea injection rate based on engine load set by Johnson Matthey® on June 8, 2010. The dashed line represents the urea injection rate with the injection rate bias to increase the urea injection rate based on the NO<sub>x</sub> outlet emissions.

**Figure 1:**



### **Methods of Estimating Ammonia Concentration**

Three methods were used for determining ammonia concentration:

- On-site field measurement using Draeger® or Sensidyne® tubes (free ammonia),
- SCAQMD Method 207.1 (free ammonia), and
- Estimated total ammonia calculation method using inlet and outlet NOx CEMS concentration and urea injection rate.

#### **Draeger® and Sensidyne® Tubes**

Free ammonia was measured in the field periodically using Draeger® and Sensidyne® tubes. A Draeger® or Sensidyne® tube is a glass vial filled with a chemical reagent that reacts and changes color in the presence of a targeted chemical. When a gas is pumped through the tube, the discoloration of the reagent is read against a scale on the outside of the tube to indicate the concentration of the chemical.

During the field sampling, a Tedlar® bag was filled with exhaust gas from the sample port located after the SCR outlet. The exhaust gas was pulled through the Draeger® or Sensidyne® tube; and the concentration of free ammonia was read against the scale on the tube. Two ranges of Draeger® tubes were used to detect ammonia: 0.25-3 ppm (low-scale) and 2-30 ppm (high-scale). If ammonia was detected and saturated the low-scale tube, the high-scale tube was used.

#### **Estimated Ammonia Calculation Method**

Using the estimated ammonia calculation formula, total ammonia is calculated based on the NOx inlet and NOx outlet concentrations, urea injection rate, and total exhaust flowrate. Data from the CEMS system and operational data from the data acquisition system (DAS) were used for the calculations. The NOx and urea react on a 1:2 basis. Therefore, the amount of urea reacted is theoretically equal to two times the amount of NOx reduced by the SCR.

$$\text{Ammonia} = \left[ \text{Urea Fed} - \frac{\text{NOx in} - \text{NOx out}}{2} \right] \times CF$$

The CEMS vendor, Cemtek Environmental, Inc., programmed the following formula to calculate ammonia slip:

$$\text{Ammonia} = \left[ \frac{(2 \times \rho \times \text{Urea Flow Rate} \times \% \text{ wt urea})}{\text{Urea Molecular Weight}} - \frac{\text{Dry Gas Flow Rate}}{29} \times \frac{(\text{NOx in} - \text{NOx out})}{10^6} \right] \times \frac{10^6}{\text{Dry Gas Flow Rate}/29} \times CF$$

The *Dry Gas Flow Rate* is calculated using the following equation:

$$\text{Dry Gas Flow Rate} = ((\text{Fuel Flow} \times \text{Fuel GCV}) \times \text{Fuel Factor}) \times (20.9/(20.9 - \% \text{ O}_2))$$

Where the following units apply:



- *Urea Flow Rate*: gallon per hour (gal/hr)
- *NOx in, NOx out* (inlet and outlet NOx concentration): parts per million (ppm<sub>c</sub>) @ 15% O<sub>2</sub>
- *Dry Gas Flow Rate*: pounds per hour (lbs/hr)
- *CF*: Correction factor (derived annually)
- *Fuel Flow Rate*: dry standard cubic feet of fuel (dscf)
- *Fuel GCV* (gas constant value): Btu value of the fuel / dscf
- *Fuel Factor*: dscf @ 0% O<sub>2</sub> / million Btu value of the fuel
- $\rho \left( \frac{H_2O}{Urea} \right) = 68.9 \frac{lb}{ft^3} \text{ or } 9.21 \frac{lb}{gal} \text{ with urea @ 32.5\% wt @ } 4^\circ C$
- *Urea Molecular Weight* =  $60.0553 \frac{lb}{mol}$

The estimated ammonia calculation method allows for adjustment of the ammonia estimation through use of the correction factor, CF. Without accounting for secondary reactions through consumption of free ammonia with other compounds in the engine exhaust gas, such as sulfates, the method actually estimates total ammonia (i.e., free ammonia plus combined ammonia). The method does allow for use of a correction factor which could be applied to account for these secondary reactions. During the pilot test, no correction factor for potential side reactions was programmed into the calculation, and the CF was assumed equal to 1.

### **SCAQMD Method 207.1**

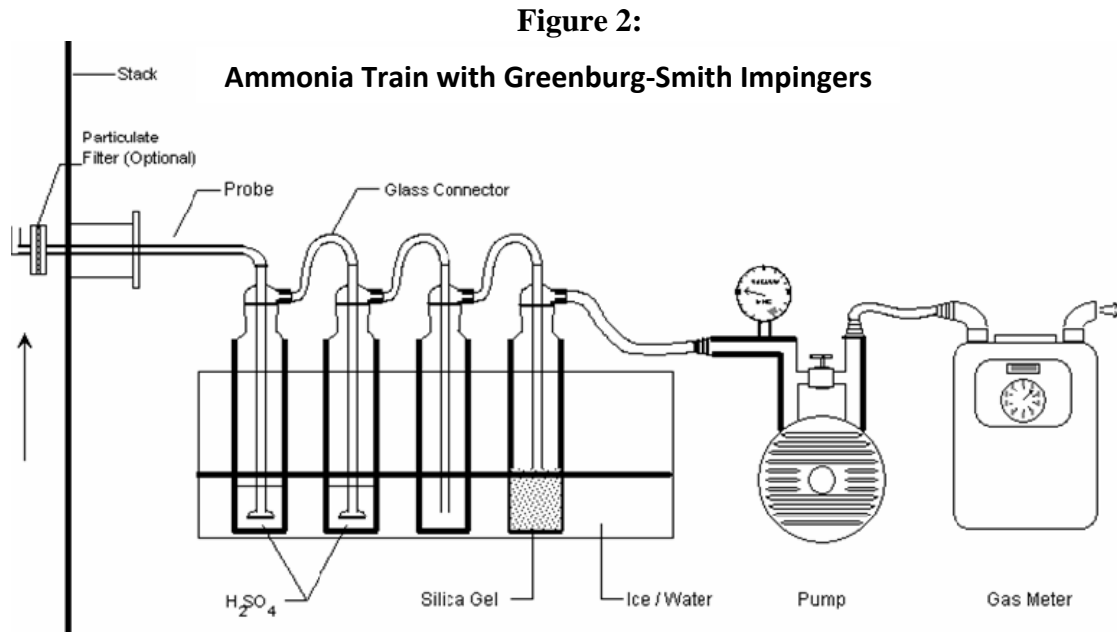
SCAQMD Method 207.1 is the regulatory approved method for determining free ammonia emissions from stationary sources. This method is a wet chemistry method in which the samples are collected from impingers containing a sulfuric acid solution. The samples are then analyzed by an ion selective electrode.

Figure 2 provides a standard setup for the SCAQMD Method 207.1. During the initial period of the pilot testing, the testing firm, SCEC, performed ammonia sampling at the stack exhaust for three loads on April 7 and 8, 2010.

### **Discussion**

Table 1 presents a comparison of the free ammonia concentrations determined using the Draeger® and Sensidyne® tubes, the free ammonia concentrations determined using SCAQMD Method 207.1, and the theoretical total ammonia calculations. The ammonia concentration values were based on the same recorded 15-minute average CEMS data for all three methods.

While the field measurements taken with the Draeger® and Sensidyne® tubes show no measurable free ammonia, the total ammonia calculation method based on the CEMS data did provide a calculated value of total ammonia (free plus combined ammonia). Likewise, the results using SCAQMD Method 207.1 on 4/7/2010, 4/8/2010, and 5/10/2011 were less than 1 ppm of free ammonia, while the estimated total ammonia method calculated values using the CEMS data were noticeably higher.



The ammonia calculation method is dependent on the NO<sub>x</sub> inlet and NO<sub>x</sub> outlet concentrations, and the urea injection rate, which is continuously changing based on the engine load and the NO<sub>x</sub> outlet concentration. The difference between the estimated total ammonia calculation method and the other techniques may be due to the conservative nature of the estimated method for determining ammonia slip, since it assumes that the ammonia from the urea consumes only NO<sub>x</sub>. There is the potential for ammonia molecules to also be consumed in other secondary reactions in the exhaust stream, such as those with sulfur compounds (forming combined ammonia). However, no correction factors were applied to account for the consumption of ammonia in secondary reactions. Without a correction factor to account for these secondary reactions, the calculation method essentially estimates total ammonia, or the sum of free and combined ammonia.

Engine load fluctuates with time. When the IC engines are set to a base load, it was observed that the actual engine load fluctuated rapidly by as much as ten percent below the set point. This was found to be typical for the OCSD IC engines. However, since urea injection rate is mapped to engine load, rapid fluctuations in load can result in rapid changes in urea injection rates. Rapidly changing urea injection rates, instead of steady rates with smooth transitions, can also lead to inaccuracies in the ammonia calculation.

**Table 1:  
Ammonia Concentration Sampling Event Summary**

Date	Engine Load	Draeger® and Sensidyne® Tube (Free Ammonia) (ppmv) <sup>1</sup>	Calculated Value (Total Ammonia) (ppmv) <sup>2</sup>	SCAQMD Method 207.1 (Free Ammonia) (ppmv)
4/7/2010 & 4/8/2010	65%	<MDL	1.66	0.12
	90%			0.18
	105%			0.43
4/21/2010	110%	<MDL	0.09	N/A
4/29/2010	90%	<MDL	0.00	N/A
5/6/2010	94%	<MDL	2.18	N/A
5/19/2010	100%	<MDL	2.54	N/A
6/29/2010	100%	<MDL	0.97	N/A
7/28/2010	100%	<MDL	0.63	N/A
8/12/2010	95%	<MDL	2.50	N/A
11/4/2010	100%	<MDL	4.95	N/A
1/12/2011	100%	<MDL	0.32	N/A
2/24/2011	100%	<MDL	0.09	N/A
5/10/2011	70%	<MDL	1.12	0.37
	90%		1.60	0.31
	110%		3.12	0.38

- Notes:**
- Free ammonia field measurements were taken at the SCR outlet using 0.25-3 ppm range and 2-30 ppm range Draeger® tubes. On 5/10/2011, additional free ammonia field measurements were taken at the stack exhaust using Sensidyne® tubes with the same measurement results as the Draeger® tubes.
  - Total ammonia was determined based on the theoretical calculation which uses NOx inlet and NOx outlet of the Cat Ox/SCR system and the urea injection rate. The calculated value reported is based on the 15-minute block average from the CEMS for the time period when the exhaust gas sample was taken for the field measurement. No correction factor was applied.
  - <MDL – less than Method Detection Limit.
  - N/A indicates not applicable. No data was taken using Method 207.1 during these field measurement events.

### Conclusions and Recommendations

Upon review of the field measurements for free ammonia and calculated values for total ammonia, the estimated total ammonia calculation method appears to overestimate the free ammonia in the SCR outlet over both the field sampling method and SCAQMD Method 207.1. This may be partially due to the varying urea injection rates. In addition, the estimated ammonia calculation method does not account for other potential ammonia reactions which may consume the unreacted ammonia, such as those with sulfur compounds in the exhaust gas. Without the application of a correction factor to account for these, the calculation method actually estimates total ammonia (free plus combined ammonia). However, this may be useful as a tool to prompt a field measurement to confirm free ammonia concentrations in the exhaust gases. Additional sampling of the

exhaust emissions could be performed to establish a correction factor for the theoretical ammonia slip calculation method. The presence of sulfur dioxide and sulfur trioxide in the exhaust gas before the SCR, and ammonium sulfate and ammonia bisulfate detected in the exhaust gas after the SCR, can indicate that secondary reactions are taking place due to the injection of urea.

Further study is needed to determine the potential for detrimental effects of ammonia sulfates formation in equipment downstream of the SCR system. For example, after two years of Engine 1 operation using the Cat Ox/SCR system with DGCS, it is recommended that OCSD examine the heat recovery boiler for any equipment deterioration or noticeable particulate buildup.

Although little, if any, free ammonia was found during the pilot study of the SCR system, it is recommended that the OCSD perform additional and routine testing for free ammonia during varying loads and fuel blends over a period of time. Additional testing for free ammonia can provide data to verify that the SCR system does not produce ammonia slip from the stack exhaust under the range of operating conditions for a given mapped urea injection versus engine load set point.

## References

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## ATTACHMENT H

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final~~Draft~~ Socioeconomic Assessment for  
**Proposed Amendments to Rule 1110.2–Emissions from Gaseous- and Liquid-  
Fueled Internal Combustion Engines**

January 2008~~November 2007~~

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Mike Harris, Senior Deputy District Counsel  
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**EXECUTIVE SUMMARY**

A socioeconomic analysis was conducted to assess the impacts of the proposed amendments to Rule 1110.2—Emissions from Gaseous-and Liquid-Fueled Internal Combustion Engines—and the alternatives for the proposed amendments identified in the Draft Environmental Assessment. A summary of the analysis and findings are presented below.

<p><b>Elements of Proposed Rule Amendments</b></p>	<p>The proposed amendments to Rule 1110.2 will require stationary, non-emergency engines to meet emission standards equivalent to current Best Available Control Technology (BACT) for natural gas engines in the next 3-5 years, <u>which partially implements the 2007 AQMP control measure MCS-001 Facility Modernization</u>; increase the source testing, <u>continuous monitoring</u>, and inspection and <u>maintenance (I&amp;M) and reporting</u><del>monitoring (I&amp;M)</del> requirements to improve rule compliance; require new electrical generating engines to meet standards that are at or <u>near the CARB 2007 Distribution Generation Emission Standards, which require the same emissions limits as equivalent to large central power plants</u>; and clarify the status of portable engines. <u>Before biogas engines are required to comply with more stringent standards in 2012, staff will conduct a technology assessment to assure that the promising new technologies that have become available are feasible and cost-effective.</u> The proposed amendments are projected to result in emission reductions of 2.2 tpd NOx, 0.69 tpd of VOC and 19 tpd CO.</p>
<p><b>Affected Facilities and Industries</b></p>	<p>The proposed amendments to Rule 1110.2 will affect 405 facilities with 859 active internal combustion engines, of which 178 facilities are in Los Angeles County, 96 are in Orange County, 78 are in Riverside County, and 53 are in San Bernardino County. These facilities belong to a wide range of industries. Approximately half (47%) of the facilities belong to the utilities sector (NAICS 221) and another 10% each belong to the industries of oil and gas extraction (NAICS 211) and government (NAICS 92).</p>
<p><b>Assumptions of Analysis</b></p>	<p>Facilities subject to Rule 1110.2 were surveyed in 2005 with data collected on 631 out of 859 active engines (74% response rate). To reflect the total number of active engines in the AQMD permit database, scaling factors for each engine type were used to re-align the survey data.</p> <p>Daily inspections are assumed to be performed by the facilities. Source testing, parametric monitoring and emission checks are assumed to be performed by testing</p>

	<p>laboratories except for facilities with more than one engine which would perform their own parametric monitoring and emission checks. It is assumed that facilities with more than one engine would perform their own CEMS maintenance while facilities with a single engine would contract maintenance with the equipment vendor.</p> <p>Based on the current technology, it is assumed that facilities have to install biogas cleanup systems, selective catalytic reduction system (SCR), and OC, or other equivalent technology by 2012. It is assumed that biogas engine maintenance would be performed by staff at the affected facilities. The life of all devices required for compliance with the proposed requirements is assumed to be 10 years.</p> <p>Catalysts are assumed to be installed and maintained by equipment vendors and will be replaced every three years.</p>
<p><b>Compliance Costs</b></p>	<p><u>Changes to the proposed amendments since the release of the Draft Socioeconomic Report have not significantly changed compliance cost.</u> Overall, costs for all the affected industries ranged from \$10.76 million in 2008 to \$27.24 million in 2012, with an average annual cost of \$22.39 million between 2008 and 2020. Costs vary significantly by industry with the majority of the cost in the utility industry (NAICS 221) with an average annual cost of \$11.53 million between 2008 and 2020. This is followed by the waste management and remediation services industry (NAICS 562) with an average annual cost of \$2.86 million between 2008 and 2020.</p> <p>Source testing and I&amp;M requirements impact 614 engines at the affected facilities, followed by the requirements for new emission limits (333), and increased continuous monitoring requirements (83 engines to install CEMS, 48 engines to install CO analyzers, and 40 engines to install AFRC). However, the requirement of new emission limits would result in the highest compliance cost, an average annual cost of \$11.0 million between 2008 and 2020.</p> <p>A technology assessment will be conducted by rule staff in 2010 to evaluate new available technologies that are feasible and cost-effective. One possible technology for biogas engines is the NOxTech system which requires no catalyst or fuel treatment that will be tested by Eastern Municipal Water District. It is expected to be more cost-effective than the technology currently proposed.</p>

<p><b>Jobs and Other Socioeconomic Impacts</b></p>	<p>Overall, 169 jobs could be forgone annually, on average, between 2008 and 2020 in the local economy. Additional job growth was projected in the professional, scientific, and technical services sector (NAICS 54) with 45 jobs gained and in the machinery manufacturing sector (NAICS 333) with 5 jobs gained. These job gains are due to an increased demand for source testing and specialized equipment to meet the lower emission limits. The industries with the greatest jobs forgone annually between 2008 and 2020 primarily are construction (NAICS 23) with 30 jobs forgone, other services (NAICS 81) with 26 jobs forgone, local and state government (NAICS 92) with 25 jobs forgone, and retail trade (NAICS 44-45) with 23 jobs forgone.</p>
<p><b>Competitiveness</b></p>	<p>The sectors of utilities (NAICS 221), oil and gas extraction (NAICS 211), and administrative and waste services (NAICS 56) would experience the largest increases in the relative cost of production and relative delivered price in 2012. These sectors also incur the highest average annual compliance costs among all private sectors. In 2020 increases in the relative cost of production and relative delivered price in these sectors are decreasing. All the remaining sectors will experience a smaller magnitude of increase in production cost and relative delivered price due to the proposed amendments.</p>
<p><b>Impacts of CEQA Alternatives</b></p>	<p>There are four CEQA alternatives associated with the proposed amendments to Rule 1110.2. Alternative A is the No Project Alternative, which is the existing Rule 1110.2. Alternative B—Expansion of Low Use Exemption—would increase the low usage exemption for non-biogas engines. Alternative C—Compliance Improvement Only—would only require increased source testing and I&amp;M, and the installation of AFRC, CO analyzers, and CEMS. Alternative D—Engine Electrification—would give biogas engines that are less than 10 years old an additional two years to comply, eliminate the low-use exemption in the proposed amendments, and require mandatory electrification of selected engines. Average annual compliance costs for the CEQA alternatives range from \$11.4 to \$29.5 million between 2008 and 2020. Jobs forgone for the CEQA alternatives range from 89 jobs to 273 jobs. CEQA Alternative D has the highest average annual cost and job impacts of all the CEQA alternatives, with an average annual cost of \$29.5 million and 273 jobs forgone between 2008 and 2020.</p>

## INTRODUCTION

The proposed amendments to Rule 1110.2 will:

- Require stationary, non-emergency engines to meet emission standards equivalent to current Best Available Control Technology (BACT) for natural gas engines in the next 3-5 years, which partially implements the 2007 AQMP control measure MCS-001 Facility Modernization;
- Increase the source testing, continuous monitoring, and inspection and maintenance (I&M) and reporting~~monitoring (I&M)~~ requirements to improve rule compliance;
- Require new electrical generating engines to meet standards that are at or near the CARB 2007 Distribution Generation Emission Standards, which require the same emissions limits as equivalent to large central power plants;
- ~~and~~ Clarify the status of portable engines.

Before biogas engines are required to comply with more stringent standards in 2012, staff will conduct a technology assessment to assure that the promising new technologies that have become available are feasible and cost-effective.

Because more than half of stationary non-emergency engines are in RECLAIM or already have BACT emission limits, the emission reductions from the proposed amendments are significant, but not as large as one might expect. The proposed amendments are projected to result in emission reductions of 2.2 tpd NOx, 0.69 tpd of VOC and 19 tpd CO. The socioeconomic analysis examines the impact of the proposed amendments and the alternatives identified in the Draft Environmental Assessment.

The proposed amendments also address non-compliance of engines with emissions limits due to poor operating and maintenance procedures and inadequate monitoring required by the existing rule. They also achieve additional emission reductions for the 2007 Air Quality Management Plan to meet the more stringent federal ozone and particulate matter standards. The United States Environmental Protection Agency (EPA) has thus raised SIP approvability issues about the Rule 1110.2 source testing and monitoring requirements. The proposed amendments may incentivize voluntary electrification of selected engines in order to reduce compliance costs (i.e., avoiding more frequent maintenance or source testing, or meeting new emission limits), which has a co-benefit of reducing CO<sub>2</sub> emissions.

## REGULATORY HISTORY

Rule 1110.2 was adopted in August 1990 to require the replacement of non-utility internal combustion engines (ICEs) with electric motors. An annual compliance cost was estimated at \$156.7 million. Utility sponsored programs that promoted the electrification of ICEs were expected to reduce the compliance cost.

This rule has subsequently been amended five times. There were administrative changes and clarifications for the rule amendments in August 1994 and December 1994, with no socioeconomic impacts. In November 1997 requirements for portable engines were revised to be consistent with federal and state regulations. In addition, the continuous emission monitoring

requirements for CO were removed and source testing was reduced from annually to every three years. This amendment was projected to result in a potential cost savings for owners/operators of stationary engines and all portable engines except those in the 50- to 100-bhp size class. Those engines requiring retrofitting would incur a cost of \$0.089 - \$0.459 million annually, depending on the control option chosen.

In June 2005 stationary agricultural engines were required to comply with the rule by replacing their engines with a controlled spark ignition engine and non-selective catalytic reduction system (NSCR) or an electric motor, or adding an NSCR to an existing spark ignition engine. The total annual cost of the proposed amendments was estimated at \$0.316 million annually. With available state funding, the net cost to agricultural facilities was reduced to \$0.004 million annually.

## **LEGISLATIVE MANDATES**

The socioeconomic assessments at the AQMD have evolved over time to reflect the benefits and costs of regulations. The legal mandates directly related to the assessment of the proposed amendments include the AQMD Governing Board resolutions and various sections of the California Health & Safety Code (H&SC).

### **AQMD Governing Board Resolutions**

On March 17, 1989 the AQMD Governing Board adopted a resolution that calls for preparing an economic analysis of each proposed rule for the following elements:

- Affected Industries
- Range of Control Costs
- Cost Effectiveness
- Public Health Benefits

On October 14, 1994, the Board passed a resolution which directed staff to address whether the rules or amendments brought to the Board for adoption are in the order of cost effectiveness as defined in the AQMP. The intent was to bring forth those rules that are cost effective first.

### **Health & Safety Code Requirements**

The state legislature adopted legislation that reinforces and expands the Governing Board resolutions for socioeconomic assessments. H&SC Sections 40440.8(a) and (b), which became effective on January 1, 1991, require that a socioeconomic analysis be prepared for any proposed rule or rule amendment that *"will significantly affect air quality or emissions limitations."* Specifically, the scope of the analysis should include:

- Type of Affected Industries
- Impact on Employment and the Economy of the district
- Range of Probable Costs, Including Those to Industries
- Emission Reduction Potential

- Necessity of Adopting, Amending or Repealing the Rule in Order to Attain State and Federal Ambient Air Quality Standards
- Availability and Cost Effectiveness of Alternatives to the Rule

Additionally, the AQMD is required to actively consider the socioeconomic impacts of regulations and make a good faith effort to minimize adverse socioeconomic impacts. H&SC Section 40728.5, which became effective on January 1, 1992, requires the AQMD to:

- Examine the type of industries affected, including small businesses; and
- Consider Socioeconomic Impacts in Rule Adoption

H&SC Section 40920.6, which became effective on January 1, 1996, requires that incremental cost effectiveness be performed for a proposed rule or amendment relating to ozone, carbon monoxide (CO), oxides of sulfur (SO<sub>x</sub>), oxides of nitrogen (NO<sub>x</sub>), and their precursors. Incremental cost effectiveness is defined as the difference in costs divided by the difference in emission reductions between one level of control and the next more stringent control.

## **AFFECTED FACILITIES**

The proposed amendments to Rule 1110.2 will affect 405 facilities with 859 active internal combustion engines, of which 178 facilities are in Los Angeles County, 96 are in Orange County, 78 are in Riverside County, and 53 are in San Bernardino County. These facilities belong to a wide range of industries. Approximately half (47%) of the facilities belong to the utilities sector (NAICS 221) and another 10% each belong to the industries of oil and gas extraction (NAICS 211) and government (NAICS 92).

### **Small Businesses**

The AQMD defines a "small business" in Rule 102 as one which employs 10 or fewer persons and which earns less than \$500,000 in gross annual receipts. In addition to the AQMD's definition of a small business, the federal Small Business Administration (SBA), the federal Clean Air Act Amendments (CAAA) of 1990, and the California Department of Health Services (DHS) also provide definitions of a small business.

The SBA's definition of a small business uses the criteria of gross annual receipts (ranging from \$0.5 million to \$25 million), number of employees (ranging from 100 to 1,500), or assets (\$100 million), depending on industry type. The SBA definitions of small businesses vary by 6-digit NAICS code.

The CAAA classifies a facility 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 NO<sub>x</sub>, and (3) is a small business as defined by SBA.

Dun and Bradstreet financial data on individual facilities for total revenue and total number of employees was available for 339 out of 405 facilities. Under the AQMD definition of a small

business, there are 44 small businesses. Using the SBA definition of a small business, there are 160 small businesses. Under the CAAA definition of a small business, 80 are small businesses.

## COMPLIANCE COST

Changes to the proposed amendments since the release of the Draft Socioeconomic Report have not significantly changed compliance cost. Under the proposed amendments, affected facilities are subject to increased source testing and I&M requirements, increased continuous monitoring requirements, and new emission limits. The affected engines can be divided into biogas and non-biogas fueled engines that are lean-burn or rich-burn engines. Some of these engines are regulated under the AQMD's RECLAIM program. Proposed requirements are the same for both biogas and non-biogas engines except for compliance dates for the new emission limits, and emission limits for new electrical generators.

Facilities subject to Rule 1110.2 were surveyed in 2005 with data collected on 631 out of 859 active engines (74% response rate). To reflect the total number of active engines in the AQMD permit database, scaling factors for each engine type were used to re-align the survey data. The scaling factors are provided in Appendix H of the Rule 1110.2 Staff Report.

Costs for the proposed requirements are divided into equipment, other capital, and annual costs. Equipment costs include the purchase, installation, and testing of equipment. Other capital costs include one-time AQMD fees, plans and protocols, and testing not associated with equipment. Annual costs include ongoing expenses such as testing, AQMD fees, maintenance labor, and replacement of equipment parts. The life of all devices required for compliance with the proposed requirements is assumed to be 10 years.

### Source Testing, Inspection, and Monitoring

The majority of engines will be subject to increased source testing and I&M requirements in 2008. However, engines used less than 2,000 hours in three years would not be required to perform additional source testing and engines monitored by a NO<sub>x</sub> and CO continuous emission monitoring system (CEMS) would not be required to develop and implement an I&M plan. Equipment necessary to comply with the source testing and I&M requirement includes alarms and portable analyzers. Other capital costs associated with the implementation of source testing and I&M requirements include the development of a facility I&M plan and source testing protocol, baseline source and parametric testing, and AQMD evaluation fees. Annual costs include source and parametric testing, emission checks using portable analyzers, daily inspections, and AQMD fees charged twice every thirteen months for review of the source test protocol and the source test report. Equipment and annual operating costs vary by engine type. Rich burn engines will have the highest annual operating costs since they will require weekly or monthly emission checks and daily parametric monitoring. Lean burn RECLAIM engines require only quarterly emissions checks and hence have the lowest annual operating costs. Daily inspections are assumed to be performed by the facilities. Source testing, parametric monitoring and emission checks are assumed to be performed by testing laboratories except for facilities

with more than one engine which would perform their own parametric monitoring and emission checks.<sup>1</sup> Table 1 shows a range of these cost categories.

### Continuous Monitoring

Compliance with continuous monitoring requirements require the installation of additional CEMS, air-to-fuel ratio controllers (AFRC), or CO analyzers to engines in 2009-2011. CEMS is required on a group of engines at the same location with a total horsepower of  $\geq 1500$  hp and using  $\geq 16 \times 10^9$  Btu/yr (not including engines  $< 500$  hp, standby engines, engines used  $< 1000$  hrs/yr, or engines using  $< 8 \times 10^9$  Btu/yr). Equipment costs of CEMS include equipment, data acquisition system, installation, certification testing, startup and training. Other capital costs include AQMD fees. Annual costs include replacement of span gases, relative accuracy test audit (RATA) testing, and CEMS maintenance. Facilities with multiple engines connected to a CEMS incur additional equipment (\$35,000) and annual (\$15,000) costs for each additional engine attached to the CEMS. These additional costs include one-time installation and sampling system equipment costs, and span gas and RATA testing annual costs. It is assumed that facilities with more than one engine would perform their own CEMS maintenance while facilities with a single engine would contract maintenance with the equipment vendor. Equipment costs for single-engine CEMS installations range from \$168,600 to \$176,600.

Engines without CEMS are required to install an AFRC. CO analyzers are required to be added on rich burn engines with an existing NOx CEMS. AFRC costs include equipment costs for equipment and annual costs for the quarterly replacement of oxygen sensors. CO analyzer costs include equipment costs for equipment. CO analyzer annual costs are assumed to be minimal since little additional span gases or RATA testing is required. AFRC (\$20,000) and CO analyzer equipment costs (\$19,000) are the same for all engine types.

### New Emission Limits

Facilities with non-biogas engines that do not have current BACT and are used more than 500 hours or burn more than 1000 MMBtu annually are required to install catalysts to comply with new emission limits in 2010 and 2011. Oxidation catalysts (OC) are required for lean burn RECLAIM engines. Rich burn engines not at the BACT level must upgrade their existing three way catalyst (TWC). Equipment costs for both types of catalysts include equipment and installation. Other capital costs include AQMD permit fees. Annual costs include catalyst replacement. Equipment costs vary by engine size with a range from \$14,858 to \$54,876. Catalysts are assumed to be installed and maintained by equipment vendors, and replaced every three years.

Biogas engines that are used more than 500 hours or burn more than 1,000 MMBtu annually are subject to new emission limits and required to meet the same emission limits as natural gas fueled engines. Based on the current technology, it is assumed that facilities have to install biogas cleanup systems, selective catalytic reduction system (SCR), and OC, or other equivalent technology by 2012. Equipment costs for biogas cleanup systems, SCR, and OC include

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<sup>1</sup> In addition, facilities with multiple engines and maintenance staff will likely purchase portable analyzers and conduct their own emission checks and daily monitoring since this is the most economical option.



equipment, installation, and performance tests. Other capital costs include AQMD permit fees. Annual costs include periodic sorbent tests, sorbent disposal and replacement, catalyst replacement for SCR and OC, additional electricity due to the parasitic load on the engine, and annual maintenance on parts. It is assumed that biogas engine maintenance would be performed by staff at the affected facilities. Equipment costs for the biogas cleanup system, SCR, and OC range from \$271,909 to \$744,793.

Table 1 shows the unit costs for the proposed requirements including equipment, other capital, and annual costs. Additional information on unit costs is presented in Appendix H of the Rule 1110.2 Staff Report.

**Table 1**  
**Unit Costs by Proposed Requirement (in dollars)**

Proposed Requirements/Control Devices			Engine Type			
Source Testing and I&M	Compliance Year	Type of Cost	Lean burn	Rich burn	Lean burn RECLAIM	Facility >1 Engine
Alarms, portable analyzers, source testing, I&M	2008	Equipment	\$240	\$240	\$240	\$10,240
		Other Capital	3,189	3,189	3,189	3,189
		Annual	10,468	15,348	6,268	10,468
Continuous Monitoring	Compliance Year	Type of Cost	Lean burn	Rich burn	Lean burn RECLAIM	Facility >1 Engine
CEMS	2009-2011	Equipment	168,600	176,600	N/A	35,000
		Other Capital	4,000	4,000		0
		Annual	35,000	35,000		15,000
AFRC	2009	Equipment	20,000			
		Annual	720			
CO analyzers	2010-2011	Equipment	19,000			
New Emission Limits	Compliance Year	Type of Cost	0-499 hp	500-999 hp	1000+ hp	
Lean-Burn OC	2010-2011	Equipment	11,880	15,312	30,765	
		Other Capital	2,300	2,300	2,300	
		Annual	1,833	2,405	4,981	
Rich-burn TWC	2010-2011	Equipment	14,858	24,010	54,876	
		Other Capital	2,300	2,300	2,300	
		Annual	4,659	7,710	17,999	
			0-1499 hp	1500+ hp		
Biogas cleanup systems, SCR, OC	2012	Equipment	271,909	744,793		
		Other Capital	6,300	6,300		
		Annual	\$56,445	\$166,331		

I&M is inspection and maintenance; CEMS is continuous emission monitoring system; AFRC is air-to-fuel ratio controllers; OC is oxidation catalyst; TWC is three way catalyst; and SCR is selective catalytic reduction system.

Source testing and I&M requirements impact 614 engines at the affected facilities, followed by the requirements for new emission limits (333), and increased continuous monitoring requirements (83 engines to install CEMS, 48 engines to install CO analyzers, and 40 engines to install AFRC). However, the requirements of new emission limits will result in the highest

average annual compliance cost of \$11.0 million between 2008 and 2020. Costs by proposed requirement are shown in Table 2.

**Table 2**  
**Costs by Proposed Requirement (in millions of dollars)**

<b>Proposed Requirement</b>	<b>2008</b>	<b>2012</b>	<b>2020</b>	<b>Average Annual (2008-2020)</b>
Source testing, I&M	\$10.8	\$8.8	\$8.8	\$9.0
Continuous monitoring	0.0	3.0	3.0	2.5
New emission limits	0.0	15.5	15.4	11.0
<b>TOTAL</b>	\$10.8	\$27.2	\$27.1	\$22.4

A technology assessment will be conducted by rule staff in 2010 to evaluate new available technologies that are feasible and cost-effective. One possible technology for biogas engines is the NOxTech system which requires no catalyst or fuel treatment that will be tested by Eastern Municipal Water District. It is expected to be more cost-effective than the technology currently proposed.

Overall, costs for all the affected industries ranged from \$10.76 million in 2008 to \$27.24 million in 2012, with an average annual cost of \$22.39 million between 2008 and 2020. Costs vary significantly by industry with the majority of the cost in the utility industry (NAICS 221) with an average annual cost of \$11.53 million between 2008 and 2020. This is followed by the waste management and remediation services industry (NAICS 562) with an average annual cost of \$2.86 million between 2008 and 2020. These costs correspond with the implementation of source testing and I&M requirements beginning in 2008, non-biogas engine compliance requirements in 2010 and 2011, and biogas engine compliance requirements in 2012. The cost by industry (NAICS) is shown in Table 3.

**Table 3**  
**Average Annual Compliance Costs by Industry (in million of dollars)**

Industry Title	NAICS Code	2008	2012	2020	Average Annual (2008-2020)
Oil, gas extraction	211	\$0.52	\$1.11	\$1.11	\$1.04
Utilities <sup>1</sup>	221	5.31	14.36	14.24	11.53
Food manufacturing	311	0.28	0.23	0.23	0.23
Textile product mills manufacturing	314	0.07	0.06	0.06	0.06
Wood product manufacturing	321	0.02	0.03	0.13	0.06
Paper manufacturing	322	0.00	0.04	0.04	0.03
Printing, related support services	323	0.02	0.03	0.03	0.03
Petroleum, coal products manufacturing	324	0.03	0.06	0.06	0.06
Chemical manufacturing	325	0.02	0.02	0.02	0.02
Plastics, rubber product manufacturing	326	0.09	0.20	0.20	0.18
Nonmetallic mineral product manufacturing	327	0.01	0.02	0.02	0.04
Primary metal manufacturing	331	0.14	0.16	0.17	0.16
Fabricated metal product manufacturing	332	0.02	0.02	0.02	0.02
Computer, electronic product manufacturing	334	0.02	0.02	0.02	0.02
Wholesale trade	42	0.11	0.49	0.49	0.40
Retail trade	44	0.02	0.03	0.03	0.03
Truck transportation	484	0.00	0.01	0.01	0.01
Transit and ground passenger transportation	485	0.06	0.45	0.45	0.38
Pipeline transportation	486	0.37	0.68	0.68	0.66
Warehousing and storage	493	0.02	0.02	0.02	0.02
Credit intermediation and related activities	522	0.00	0.10	0.10	0.09
Insurance carriers and related activities	524	0.02	0.02	0.02	0.02
Funds, trusts, and other financial vehicles	525	0.07	0.06	0.06	0.06
Real estate	531	0.12	0.10	0.10	0.10
Professional, scientific, technical services	541	0.27	0.79	0.77	0.63
Administrative and support services	561	0.14	0.12	0.12	0.12
Waste management, remediation services <sup>1</sup>	562	0.05	4.28	4.08	2.86
Educational services	611	0.28	0.43	0.43	0.40
Hospitals	622	0.36	0.58	0.58	0.55
Nursing and residential care facilities	623	0.06	0.07	0.08	0.07
Performing arts, spectator sports, and related industries	711	0.05	0.04	0.04	0.04
Amusement, gambling and recreation industries	713	0.48	0.51	0.52	0.50
Accommodation	721	0.42	0.46	0.46	0.45
Repair and maintenance	811	0.02	0.02	0.02	0.02
Religious, grantmaking, civic, professional, and Similar Organizations	813	0.14	0.12	0.12	0.12
Government	92	1.15	1.54	1.60	1.42
<b>TOTAL</b>		<b>\$10.76</b>	<b>\$27.24</b>	<b>\$27.12</b>	<b>\$22.39</b>

<sup>1</sup>The utilities sector provides services in electric power, natural gas, steam supply, water supply, and sewage removal while the waste management and remediation services sector is involved in the collection, treatment, and disposal of waste materials.

## **JOBS AND OTHER SOCIOECONOMIC IMPACTS**

The REMI model (version 9.0.3) is used to assess the total socioeconomic impacts of a policy change. The model links the economic activities in the counties of Los Angeles, Orange, Riverside, and San Bernardino. The REMI model for each county is comprised of a five block structure that includes (1) output and demand, (2) labor and capital, (3) population and labor force, (4) wages, prices and costs, and (5) market shares. These five blocks are interrelated. Within each county, producers are made up of 66 private non-farm industries, three government sectors, and a farm sector. Trade flows are captured between sectors and borders as well as across counties and the rest of U.S. Market shares of industries are dependent upon their product prices, access to production inputs, and local infrastructure. The demographic/migration component has 160 ages/gender/race/ethnicity cohorts and captures population changes in births, deaths, and migration.

The assessment herein is performed relative to a baseline of the existing Rule 1110.2. Direct effects of the policy change (proposed amendments) have to be estimated and used as inputs to the REMI model in order for the model to assess secondary and induced impacts for all the actors in the four-county economy on an annual basis and across a user-defined horizon. Direct effects of PAR 1110.2 include additional costs of proposed requirements to affected industries and additional sales of control devices by local vendors at the county (or finer) level and by industry.

The proposed amendments would create an additional demand for the services of testing laboratories (NAICS 541) such as source and parametric testing and emission checks due to the source testing requirements, RATA tests on CEMS for the monitoring requirements, and performance and sorbent tests for biogas cleanup systems for meeting the new emission limits. There would be additional demand for the products in the industrial machinery manufacturing sector (NAICS 333) due to the purchase, installation, and maintenance of OC, TWC, SCR, and biogas cleanup systems for meeting the new emission limits. Additional demand would be created for instruments for controlling industrial process variables (NAICS 334) due to the purchase, installation, and maintenance of alarms and portable analyzers for source testing and CEMS, AFRC, and CO analyzers for monitoring requirements. Lastly, there would be additional demand in the chemical manufacturing sector (NAICS 325) for span gases used in the operation of CEMS for monitoring requirements and in utilities (NAICS 221) for electricity from the parasitic load on biogas engines from installing biogas cleanup systems and catalysts.

Costs for capital equipment including alarms and portable analyzers for source testing requirements; CEMS, AFRC, CO analyzers for monitoring requirements; and OC, TWC, biogas cleanup systems/SCR/OC for meeting the new emission limits were annualized at the 4-percent real interest rate as the additional cost of doing business to the affected facilities. For the government sector, this is modeled as a decrease in government spending elsewhere. There will be additional labor required for source testing and I&M requirements (I&M plan, daily inspections, emission checks, and source testing); CEMS maintenance for monitoring requirements; and biogas cleanup system and SCR maintenance (routine maintenance and replacement of parts), for biogas engines for meeting the new emission limits. The additional labor requirement would result in reduced labor productivity for affected businesses. One-time

AQMD permit and evaluation fees for the installation of new or modified equipment and the evaluation of I&M plans and source testing protocols are an additional cost of doing business for the affected facilities and represent an increase in demand by local governments on the other hand.

Overall, 169 jobs could be forgone annually between 2008 and 2020 in the local economy. This represents on average 0.0016 percent of total estimated jobs in the four-county region between 2008 and 2020. The machinery manufacturing sector is only 40% value added while the professional, scientific, and technical services is 70% value added which means that additional demand in these sectors will create greater job impacts in the professional, scientific, and technical services sector.

The industry sectors with the greatest jobs forgone annually between 2008 and 2020 are primarily construction (NAICS 23) with 30 jobs forgone, other services (NAICS 81) with 26 jobs forgone, local and state government (NAICS 92) with 25 jobs forgone, and retail trade (NAICS 44-45) with 23 jobs forgone. Despite having the highest compliance cost, the capital-intensive utility sector is projected to have minimal jobs forgone. However, construction activities represent a significant input for the utility sector. The reduction in output of the utility sector would thus have a relatively large impact on the labor-intensive construction sector. The costs incurred by biogas facilities in the public sector could result in jobs forgone in local and state government. Jobs forgone in the other services and retail trade sectors are due to a drop in real disposable income, which reduces consumption in these areas. Job growth was projected in the professional, scientific, and technical services sector (NAICS 54) with 45 jobs gained and in the machinery manufacturing sector (NAICS 333) with 5 jobs gained. These job gains are due to an increased demand for source testing and specialized equipment to meet the lower emission limits. Table 4 presents estimated job impacts by industry for the proposed amendments.

**Table 4**  
**Job Impacts by Industry**

Industry	(NAICS)	2008	2012	2020	Average Annual (2008-2020)
Oil, gas extraction	211	0	-1	-2	-1
Utilities	221	0	-2	-4	-3
Construction	23	-7	-25	-40	-30
Food manufacturing	311	0	-1	-2	-2
Apparel manufacturing	315	0	0	-1	0
Wood product manufacturing	321	0	-1	-1	-1
Paper manufacturing	322	0	0	-1	0
Printing, related support services	323	0	0	-1	-1
Chemical manufacturing	325	0	0	-1	0
Plastics, rubber product manufacturing	326	0	0	-1	-1
Nonmetallic mineral product manufacturing	327	0	0	-1	-1
Primary metal manufacturing	331	0	0	-1	-1
Fabricated metal product manufacturing	332	0	2	-3	-2
Machinery manufacturing	333	0	38	1	5
Motor vehicle manufacturing	3361-3363	0	0	-1	-1
Transportation equipment manufacturing	3364-3369	0	0	-1	0
Computer, electronic product manufacturing	334	0	-1	-1	-1
Electrical equipment, appliance manufacturing	335	0	0	-1	0
Furniture, related product manufacturing	337	0	-1	-2	-1
Miscellaneous manufacturing	339	0	0	-1	-1
Wholesale trade	42	-1	-2	-11	-7
Retail trade	44-45	-5	-15	-33	-23
Transportation and Warehousing	48-49	-1	-2	-8	-5
Information	51	-2	-4	-7	-5
Finance and Insurance	52	-3	-7	-15	-11
Real Estate and Rental and Leasing	53	-1	-8	-17	-11
Professional, Scientific, Technical Services	54	52	71	33	45
Management of Companies and Enterprises	55	0	1	-3	-2
Administrative and Support and Waste Management and Remediation Services	56	1	-6	-28	-16
Educational services	61	0	-4	-11	-7
Health Care and Social Assistance	62	-1	-4	-19	-11
Arts, Entertainment and Recreation	71	0	-4	-7	-5
Accommodation and Food Services	72	-4	-12	-26	-18
Other Services	81	-10	-26	-34	-26
Local and State Government	92	-14	-21	-40	-25
<b>Total<sup>1</sup></b>		<b>1</b>	<b>-37</b>	<b>-293</b>	<b>-169</b>

<sup>1</sup>The sum of individual numbers may not be the same as the total due to rounding.

### **Competitiveness**

The additional cost brought on by the proposed rule would increase the cost of production of the affected industries relative to their national counterparts. Changes in relative production costs would thus be a good indicator of changes in relative competitiveness. The magnitude of the impact depends on the size and diversification of, and infrastructure in a local economy as well as interactions among industries. A large, diversified, and resourceful economy would absorb the impact with relative ease. Implementation of the proposed amendments to Rule 1110.2 increases the cost of doing business for affected industries.

An index of 0 indicates that there is no change in the cost of production relative to the rest of the United States. An index of above or below 0 means that the cost of production in the four-county areas resulting from the proposed amendments is higher or lower, respectively, than that in the rest of the U.S.

The sectors of utilities (NAICS 221), oil and gas extraction (NAICS 211), and administrative and waste services (NAICS 56) would experience the largest increases in the relative cost of production, as shown in Table 5. The utilities sector would experience an increase of 0.076% in 2012. These sectors also incur the highest average annual compliance costs among all private sectors. In 2020 increases in the relative cost of production in these sectors are decreasing. All the remaining sectors will experience a smaller magnitude of increase in production cost due to the proposed amendments.

Changes in production costs will affect prices of goods produced locally. The relative delivered price of a good is based on its production cost and the transportation cost of delivering the good to where it is consumed or used. The average price of a good at the place of use reflects prices of the good produced locally and imported elsewhere.

Based on the measurement of relative delivered prices in the REMI model, the proposed amendments are projected to result in higher delivered prices. These impacts are similar to those for the relative cost of production. The same industry sectors of utilities (NAICS 221), oil and gas extraction (NAICS 211), and administrative and waste services (NAICS 56) would experience the largest increases in relative delivered prices (Table 5). The utilities sector would experience a 0.0598% increase in relative delivered price in 2012. Increases in relative delivered price are decreasing in 2020. Nearly all other industries will experience a smaller magnitude of increase in relative delivered price.

**Table 5**  
**Impacts on Relative Cost of Production and Delivered Prices**  
**(Relative to the U.S.)**

Industry	Relative Cost of Production		Relative Delivered Price	
	2012	2020	2012	2020
Forestry, Fishing, Other	0.0006%	0.0005%	0.0002%	0.0001%
Oil and Gas Extraction	0.0213%	0.0177%	0.0068%	0.0056%
Utilities	0.0760%	0.0629%	0.0598%	0.0495%
Construction	0.0006%	0.0007%	0.0006%	0.0007%
Manufacturing	0.0015%	0.0013%	0.0010%	0.0008%
Wholesale Trade	0.0009%	0.0007%	0.0008%	0.0007%
Retail Trade	0.0008%	0.0006%	0.0008%	0.0006%
Transportation and Warehousing	0.0036%	0.0031%	0.0027%	0.0023%
Information	0.0008%	0.0006%	0.0007%	0.0005%
Finance and Insurance	0.0009%	0.0007%	0.0008%	0.0006%
Real Estate, Rental and Leasing	0.0019%	0.0012%	0.0018%	0.0012%
Professional and Technical Services	0.0011%	0.0008%	0.0011%	0.0008%
Management Companies and Enterprises	0.0005%	0.0004%	0.0005%	0.0004%
Administrative and Waste Services	0.0102%	0.0076%	0.0103%	0.0077%
Educational Services	0.0041%	0.0034%	0.0036%	0.0029%
Health Care and Social Assistance	0.0014%	0.0011%	0.0012%	0.0010%
Arts, Entertainment and Recreation	0.0025%	0.0020%	0.0031%	0.0024%
Accommodation and Food Services	0.0020%	0.0016%	0.0014%	0.0011%
Other Services (excluding Government)	0.0013%	0.0011%	0.0013%	0.0010%

## CEQA ALTERNATIVES

There are four CEQA alternatives associated with the proposed amendments to Rule 1110.2. Alternative A is the No Project Alternative, which is the existing Rule 1110.2, and would continue the existing emission limits.

Alternative B—Expansion of Low Use Exemption—would increase the low usage exemption for non-biogas engines from the new emission limits to engines used less than 1,000 hours or consuming less than 2,000 MMBtu of electricity annually, allow biogas engines a 1 hour averaging time, and exempt lean-burn engines from installing CEMS. Increasing the low usage exemption for non-biogas engines would result in having fewer CEMS, oxidation catalysts and TWC installed, but would increase the number of AFRCs installed. Alternative B would maintain the same source testing and I&M requirements; and the same number of CO analyzers for non-biogas engines and biogas cleanup systems, SCR, and oxidation catalysts for biogas engines installed as the proposed amendments.

Alternative C—Compliance Improvement Only—would only require increased source testing and I&M, and the installation of AFRC, CO analyzers, and CEMS, compared to the proposed amendments.



Alternative D—Engine Electrification—would give biogas engines that are less than 10 years old an additional two years to comply with the new emission limits, eliminate the low-use exemption in the proposed amendments, reduce the new CO limit from 250 to 70 ppmvd (parts per million per volume), and require mandatory electrification of selected engines that are evaluated to be technically and economically feasible. It would reduce the installation of CEMS, CO analyzers, AFRC, oxidation catalysts, and TWC because engines subject to mandatory electrification would no longer have to install these types of equipment. However, the increased source testing and I&M requirement for all non-electrified engines and the installation of equipment for biogas engines would remain the same as the proposed amendments for engines not subject to electrification. There would be costs associated with mandatory electrification of engines, including engine removal and replacement with an electric motor and increased electricity charges. There would be savings resulting from no longer using natural gas or diesel fuel and reduced maintenance labor cost.

Average annual compliance costs for the CEQA alternatives range from \$11.4 to \$29.5 million between 2008 and 2020. Jobs forgone for the CEQA alternatives range from 89 jobs to 273 jobs. CEQA Alternative D has the highest average annual cost and job impacts of all the CEQA alternatives, with an average annual cost of \$29.5 million and 273 jobs forgone between 2008 and 2020. Some of these additional job losses would be due to the decreased demand for engine repair and maintenance services (NAICS 811) and for natural gas and diesel fuels (NAICS 221) from the mandatory electrification of engines.

**Table 6  
Cost and Job Impacts of CEQA Alternatives (in millions of dollars)**

Alternative	Average Annual (2008-2020)		
	Cost	Cost-Effectiveness \$/ton (NO <sub>x</sub> , VOC, CO)	Jobs
Proposed Amendments	\$22.4	\$5,651	-169
Alternative A—No Project	0.00	N/A	N/A
Alternative B— Expansion of Low Use Exemption	20.4	\$5,879	-148
Alternative C— Compliance Improvement Only	11.4	\$3,503	-89
Alternative D—Engine Electrification	\$29.5	\$5,348	-273

**RULE ADOPTION RELATIVE TO THE COST-EFFECTIVENESS SCHEDULE**

On October 14, 1994, the Governing Board adopted a resolution that requires staff to address whether rules being proposed for adoption are considered in the order of cost-effectiveness. The 2007 Air Quality Management Plan (AQMP) ranked, in the order of cost-effectiveness, all of the proposed control measures for which costs were quantified. It is generally recommended that the most cost-effective actions be taken first. While Rule 1110.2 is not part of a quantified control measure under the 2007 AQMP, it will achieve additional emission reductions required by the 2007 AQMP to meet more stringent federal ozone and particulate matter standards.

**REFERENCES**

South Coast Air Quality Management District. Governing Board packages for Rule 1110.2 amendments and initial rule adoption. August 1990, September 1990, August 1994, December 1994, November 1997, June 2005.

South Coast Air Quality Management District. Draft Environmental Assessment. Proposed Amended Rule 1110.2. October 2007.

South Coast Air Quality Management District. Draft Staff Report and Rule. Proposed Amended Rule 1110.2. November 2007.

# ATTACHMENT I

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

### **Addendum to the 2007 Final Environmental Assessment for Proposed Amended Rule 1110.2 – Emissions from Gaseous - and Liquid-Fueled Engines**

**August 2012**

**SCAQMD No. 120817JK**

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GOVERNING BOARD**

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## **INTRODUCTION**

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977<sup>1</sup> as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin referred to herein as the district. The 2007 AQMP concluded that major reductions in emissions of particulate matter (PM), oxides of sulfur (SO<sub>x</sub>) and oxides of nitrogen (NO<sub>x</sub>) are necessary to attain the state and national ambient air quality standards for ozone, particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>). More emphasis is placed on NO<sub>x</sub> and SO<sub>x</sub> emission reductions because they provide greater ozone and PM emission reduction benefits than volatile organic compound (VOC) emission reductions. VOC emission reductions, along with NO<sub>x</sub> emission reductions, continue to be necessary, because emission reductions of both of these ozone precursors are necessary to meet the ozone standards.

Existing Rule 1110.2 - Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines, regulates NO<sub>x</sub>, carbon monoxide (CO), and volatile organic compound (VOC) emissions from stationary and portable engines in the district producing more than 50 rated brake horsepower (bhp). It was originally adopted in 1990 and amended in 2008 to implement, in part, the 2007 AQMP Control Measure MCS-01 – Facility Modernization.

The currently proposed amendments would make effective certain limits already adopted and analyzed in a California Environmental Quality Act (CEQA) document for the amendments to Rule 1110.2 adopted in 2008, which established new exhaust emission concentration limits for landfill and digester gas-fired engines to take effect July 1, 2012. These limits did not take effect because they were contingent upon completion of a technology assessment by July 2010. Except for CO, the emission standards would be equivalent to the current best available control technology (BACT) for NO<sub>x</sub> and VOC for new internal combustion engines. Among the engines affected by the 2008 amendments were approximately 55 engines that are fired by landfill or digester gas (biogas), located at 13 public and private landfills and wastewater treatment plants.

Subsequent to the 2008 amendments, Rule 1110.2 was last amended in 2010 to exempt public safety communications engines located at remote sites. The currently proposed amendments would have no effect on the provisions added to Rule 1110.2 in 2010, so this Addendum does not need to consider the 2010 amendments to Rule 1110.2 further.

The adopting resolution for the 2008 amendments to Rule 1110.2 directed staff to conduct a technology assessment before July 2010 to address the feasibility of achieving the July 1, 2012 compliance limits for biogas-fueled engines. However, the permit moratorium in 2009 caused a delay in the startup of demonstration projects designed to test whether or not the final compliance limits were feasible. Because of this delay, SCAQMD staff presented an *Interim Report on the Technology Assessment for Rule 1110.2 Biogas Engines* to the Governing Board in July 2010. The interim report pointed to two potential technologies that were being evaluated in the continuing demonstration projects that were part of the technology demonstration. One demonstration project has since been completed, but the other demonstration project's startup

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<sup>1</sup> The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health & Safety Code, §§40400-40540).

has been affected by other unforeseen delays. Given the delays in completing the demonstration projects at that time, the Interim Technology Assessment mentioned the possible necessity of an adjustment to the July 1, 2012 effective date to allow additional time for the completion of the technology assessment.

The proposed amendments would:

- Allow biogas facility operators/owners three and a half to six additional years to comply with the emission limits that did not take effect. The new effective date would be January 1, 2016. Permit application fees would be refunded to biogas-fueled engines owner/operators who establish to the satisfaction of the Executive Officer that they have complied with the emission limits of Table III-B by January 1, 2015. Owners or operators of biogas-fired units that operate under long term fixed price power purchase agreements that have been entered into prior to February 1, 2008, and extend beyond January 1, 2016 may elect to defer compliance by up to two additional years and no later than January 1, 2018 provided that they submit an alternative compliance plan and pay a compliance flexibility fee. The compliance flexibility fees associated with the alternative compliance plan would be applied to SCAQMD NOx reduction programs pursuant to protocols approved under SCAQMD rules.
- Provide a compliance option with a longer averaging time, provided that the engine operator can demonstrate through continuous emission monitoring systems (CEMS) that emissions are at least 9.9 ppmv for NOx and 225 ppmv for CO.

The proposed amendments are described in more detail in the “Project Description” section below and in Appendix A to this Addendum.

SCAQMD staff has met with stakeholders and the affected community to discuss the feasibility and cost effectiveness of the control technologies expected to be used to comply with the biogas-fueled engine requirements of Rule 1110.2. SCAQMD staff has also met individually with most affected facility operators to discuss site-specific issues relative to complying with the proposed emission limits for biogas-fueled engines. These discussions are ongoing.

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

The proposed amendments to Rule 1110.2 are considered to be a "project" as defined by the California Environmental Quality Act (CEQA). CEQA requires that the potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD, as the CEQA Lead Agency for the proposed project has prepared this Addendum to the 2007 Final Environmental Assessment for Proposed Amended Rule 1110.2 - Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (SCAQMD No. 280307JK, December 2007) (2007 Final EA) adopted February 1, 2008, which included an evaluation of environmental impacts from amending Rule 1110.2, cumulative impacts, project alternatives, and all other applicable CEQA requirements.

Analysis of the proposed project indicated that an Addendum to the 2007 Final EA prepared pursuant to CEQA Guidelines §15164 is the appropriate CEQA document for this project, because SCAQMD staff has concluded that the proposed amendments only result in some changes or additions to the 2007 Final EA that do not trigger the conditions described in CEQA Guidelines §15162 calling for preparation of a subsequent EIR:

1. No substantial changes are proposed in the project which required major revision of the previous CEQA document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
2. No substantial changes would occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous CEQA document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous CEQA document was certified as complete shows any of the following:
  - A. One or more significant effects not discussed in the previous CEQA document;
  - B. Significant effects previously examined with be substantially more severe than shown in the previous CEQA document;
  - C. Mitigation measures or alternatives previously found not to be feasible would be in fact feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the migration measure or alternative; or
  - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the migration measure or alternative.

Based on the analysis in this addendum, PAR 1110.2 would not generate new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Since PAR 1110.2 would not generate new significant environmental effects or a substantial increase in the severity of previously identified significant effects, no new mitigation measures or alternatives have been proposed. No changes to existing mitigation measures or alternatives are proposed. This conclusion is supported by substantial evidence provided as part of the environmental analysis in this Addendum and other documents in the record.

Thus this Addendum, prepared pursuant to CEQA Guidelines §15164, focuses on the topic of air quality and GHG emissions, specifically operational air quality impacts. Although the currently proposed project would delay the final compliance limits for biogas engines, this proposal is not considered a rule relaxation for the following reasons. The 2008 amendments to Rule 1110.2 included a provision that the emission limits for biogas-fueled engines would only become effective provided that SCAQMD staff conducts a technology assessment and reports to the Governing Board by July 2010. Because the technology assessment was not completed by July 2010, the emission limits for biogas engines are not considered to be in effect.

The analysis of these potential environmental impacts did not identify any significant adverse environmental impacts, including operational air quality impacts, or make worse any previously identified significant adverse impacts from the 2007 Final EA. Thus, an Addendum to the 2007 Final EA is considered to be the appropriate CEQA document for the proposed project. In addition, pursuant to CEQA Guidelines §15252(a)(2)(B), no project alternatives or mitigation measures are proposed. Prior to making a decision on the proposed amendments to Rule 1110.2, the SCAQMD Governing Board must review this Addendum along with the 2007 Final EA.



## **PROJECT LOCATION**

The SCAQMD has jurisdiction over an area of 10,473 square miles (referred to hereafter as the district), consisting of the four-county South Coast Air Basin and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD's jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of both Riverside County and the SSAB and is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 1).



**Figure 1**  
**Boundaries of the South Coast Air Quality Management District**

## **PROJECT OBJECTIVES**

One of the original project objectives of the 2008 amendments to Rule 1110.2 analyzed in the 2007 Final EA was to achieve NO<sub>x</sub> emission reductions from affected equipment through imposing control requirements close to BACT in effect at that time, contingent upon a technology assessment presented to the Governing Board in July 2010. A final technology assessment was not available in July 2010, so the original project objective needs to be amended to allow an additional time for biogas-fueled engines to comply with the final biogas-fueled engine emission concentration limits in the existing rule that have been verified a final technology assessment. PAR 1110.2 would continue to adhere to this objective, but allow additional time for operators at facilities with biogas-fueled engines to comply with the proposed biogas concentration limits. Further, the results of OCSD's pilot study shows greater flexibility in complying with the final NO<sub>x</sub> emission limits is necessary. To this end, to facilitate achieving the above objective, PAR 1110.2 would provide greater flexibility in demonstrating compliance with the final NO<sub>x</sub> emission limits by extending the compliance testing averaging time.

## **PROJECT BACKGROUND – BIOGAS-FUELED ENGINES**

Rule 1110.2 applies to stationary and portable reciprocating internal combustion engines (ICEs) over 50 brake horsepower (bhp); therefore, Rule 1110.2 regulates biogas-fueled engines. Biogas-fueled engines are engines that operate at landfills and wastewater treatment plants. Biogas-fueled engines are lean-burn engines that operate similarly to lean-burn natural gas-fired engines.

Biogas is generated from the breakdown of municipal solid waste at landfills. Biogas from landfills is primarily composed of methane, carbon dioxide, and contaminants such as siloxane and hydrogen sulfide (H<sub>2</sub>S). The gas is collected in a series of wells and transported by pipeline to treatment facilities where it is filtered, dewatered, and compressed prior being combusted in the landfill-gas fired engines. Depending on the volume and methane content of the landfill gas collected, it can be used to fuel one or more biogas-fueled engines. If the methane content of the landfill gas is relatively low or the volume collected is low, natural gas, may be used as a supplemental fuel to increase the heat content of the digester gas.

Biogas is also generated at wastewater treatment facilities in digesters. A digester is a process unit in which sewage is broken down by bacteria in a heated oxygen-free (anaerobic) environment. A by-product of this process is biogas that contains methane, CO<sub>2</sub>, and small amounts of H<sub>2</sub>S. The treatment of biogas may include removal of components including hydrogen sulfide, water, carbon dioxide, trace organics, and particulates. This digester gas can typically fuel one or more biogas-fueled engines. Natural gas may be used as a supplemental fuel to increase the heat content of the landfill gas.

Biogas-fueled engines are typically used to produce electricity. Some owner/operators use the biogas-generated electricity to provide power for their facility. Other owner/operators sell the biogas-generated power to local electric utility providers. Wastewater treatment plants are typically operated by public entities and utility providers, while the landfills are operated by either public or private operators.

Approximately 66 biogas-fueled engines with SCAQMD permits were identified in the 2010 Interim Technology Assessment. Since that time, some biogas-fueled engines have been removed from service, so the number of biogas-fueled engines remaining at the beginning of the PAR 1110.2 development process has decreased to 55. These 55 engines are located at 22 public and private landfills and wastewater treatment plants under the ownership of 13 operators. These biogas-fueled engines are among the top NO<sub>x</sub> emitters among stationary, non-emergency engines. As shown in Table 1, based on annual reporting data from 2010, 13 of the top 25 NO<sub>x</sub> emitters are stationary, non-emergency engines at biogas facilities.

**Table 1**  
**“Top 25” Facilities with Highest NOx Emissions from Stationary,**  
**Non-Emergency Engines (Pounds per Year) in 2010**

<b>Facility</b>	<b>ID No.</b>	<b>NOx</b>	<b>ROG</b>	<b>CO</b>	<b>Fuel(s)</b>
U.S. Govt, Dept Of Navy	800263	110,713	8,967	24,390	Diesel
U.S. Govt, Dept Of Navy	800263	80,714	9,701	26,387	Diesel
Exxonmobil Oil Corporation	800089	69,961	5,594	15,215	Diesel
<b><u>La County Sanitation District-Puente Hills</u></b>	<b>25070</b>	<b>52,796</b>	<b>18,068</b>	<b>284,104</b>	<b>Landfill Gas</b>
<b><u>Orange County Sanitation District</u></b>	<b>29110</b>	<b>48,912</b>	<b>68,945</b>	<b>611,663</b>	<b>Digester Gas</b>
<b><u>Orange County Sanitation District</u></b>	<b>17301</b>	<b>41,478</b>	<b>43,767</b>	<b>426,682</b>	<b>Digester Gas</b>
U.S. Govt, Dept Of Navy	800263	38,469	3,827	10,408	Diesel
Crimson Resource Management	142517	38,093	507	64,119	Natural Gas (Rich-Burn)
<b><u>Mm Lopez Energy Llc</u></b>	<b>104806</b>	<b>35,662</b>	<b>10,707</b>	<b>142,482</b>	<b>Landfill Gas</b>
<b><u>Mm Prima Deshecha Energy, LLC</u></b>	<b>117297</b>	<b>32,599</b>	<b>6,321</b>	<b>127,325</b>	<b>Landfill Gas</b>
<b><u>Mm Prima Deshecha Energy, LLC</u></b>	<b>117297</b>	<b>31,474</b>	<b>14,005</b>	<b>141,724</b>	<b>Landfill Gas</b>
Exxonmobil Oil Corporation	800089	28,192	2,254	6,131	Diesel
<b><u>Mm Lopez Energy LLC</u></b>	<b>104806</b>	<b>28,189</b>	<b>11,753</b>	<b>110,606</b>	<b>Landfill Gas</b>
U.S. Govt, Dept Of Navy	800263	21,923	2,181	5,931	Diesel
Eop - 10960 Wilshire LLC	119133	20,083	267	33,805	Natural Gas (Rich-Burn)
Hollywood Park Land Company LLC	145829	19,792	1,583	4,304	Diesel
Samuel P Lewis Dba Chino Welding & Assem	150351	19,542	260	32,894	Natural Gas (Rich-Burn)
<b><u>Toyon Landfill Gas Conversion LLC</u></b>	<b>142417</b>	<b>18,000</b>	<b>9,991</b>	<b>100,575</b>	<b>Landfill Gas</b>
Orange, County Of - Sheriff Dept, Fac Op	72525	17,314	499	1,344	Natural Gas (Lean-Burn)
<b><u>Brea Parent 2007, LLC</u></b>	<b>113518</b>	<b>17,033</b>	<b>1,099</b>	<b>4,555</b>	<b>Landfill Gas</b>
Huntington Beach City, Water Dept	20231	15,370	205	25,871	Natural Gas (Rich-Burn)
<b><u>Brea Parent 2007, LLC</u></b>	<b>113518</b>	<b>15,346</b>	<b>784</b>	<b>3,140</b>	<b>Landfill Gas</b>
<b><u>Brea Parent 2007, LLC</u></b>	<b>113518</b>	<b>14,181</b>	<b>1,052</b>	<b>4,958</b>	<b>Landfill Gas</b>
<b><u>Waste Mgmt Disp &amp; Recy Servs Inc (Bradley)</u></b>	<b>50310</b>	<b>13,934</b>	<b>3,465</b>	<b>60,087</b>	<b>Landfill Gas</b>
<b><u>Waste Mgmt Disp &amp; Recy Servs Inc (Bradley)</u></b>	<b>50310</b>	<b>13,839</b>	<b>3,823</b>	<b>67,514</b>	<b>Landfill Gas</b>
Totals, pound per year		843,607	229,624	2,336,216	
Totals, ton per year		422	115	1,168	
Totals, ton per day		1.16	0.31	3.20	

## **PROJECT DESCRIPTION**

The following is a summary of the proposed amendments to Rule 1110.2. A copy of PAR 1110.2 can be found in Appendix A.

### **Subdivision (a) - Purpose**

No change.

### **Subdivision (b) - Applicability**

No change.

### **Subdivision (c) - Definitions**

The type “by” is corrected to “be” in the useful heat recovered definition.

### **Subdivision (d) - Requirements**

- Requirement (d)(1)(B) would be clarified to read “The operator of any stationary engine not covered by (d)(1)(A) and not exempt from this rule shall...”
- Table III would be split into two tables. The concentration limits in Table III that became effective when the 2008 amendments were adopted would become Table IIIA. The concentrations in Table III labeled effective July 1, 2012 would become Table III-B. The effective date for those concentration limits would be changed from July 1, 2012, to January 1, 2016.
- Table III-A or B would be added to the existing Table II in the prohibition not to exceed applicable emissions concentration limits in (d)(1)(B)(ii), so the phrase “notwithstanding the provisions in subparagraph (d)(1)(B)” would be removed in (d)(1)(C).
- The existing reference to Table III in (d)(1)(C) would be changed to Table III-A, since Table III-A would be split into Table III-A and Table III-B.
- “The concentration limits effective on and after July 1, 2012 shall become effective provided the Executive Officer conducts a technology assessment that confirms that the limits are achievable, and reports to the Governing Board by July 2010, at a regularly scheduled public meeting,” would be removed from subparagraph (d)(1)(C).
- Subparagraph (d)(1)(D) would be added that states that notwithstanding the provisions of subparagraph (d)(1)(B), the operator of any stationary engine fired by landfill or digester gas (biogas) shall not operate the engine in a manner that exceeds the emission concentration limits in Table III.
- Provision (d)(1)(E) would be added that states that biogas engines operators that have established that they have complied with emissions limits of Table III-B by January 1, 2015 would have their respective engine permit application fees refunded.
- The provision in Subparagraph (d)(1)(C) that states that there shall be no limit on the percentage of natural gas burned, once a engine complies with concentration limits effective on and after July 1, 2012, would be deleted and replaced with provision (d)(1)(F), which states once an engine complies with the concentration limits in Table III-B of the proposed amended rule, there would be no limit on the percentage of natural gas burned.
- The effective date of the rule provision that would exclude engines that operate less than 500 hours per year or use less than 1,000,000,000 Btus per year (higher heating value) of fuel on or after July 1, 2012, would be deleted from (d)(1)(C) and replaced with a new subparagraph (d)(1)(G) that states that the concentration limits in the Table III-B shall not apply to engines that operate less than 500 hours per year or use less than 1,000,000,000 Btus per year (higher heating value) of fuel.

- An operator of a biogas engine would be allowed to determine compliance with the NOx and/or CO limits of Table III-B by utilizing a longer averaging time as set forth in the proposed rule, provided that the operator demonstrates through CEMS data that the engine is achieving a concentration at or below 9.9 ppmv for NOx and 225 ppmv for CO (each corrected to 15 percent oxygen) over a four month time period. The operator would be allowed to use a monthly averaging time for the first four months of engine operation and up to a 12 hour averaging time thereafter. Additional requirements pertaining to CEMS monitoring related to this provision are included.
- Internal section references were updated to account for changes to section numbering caused by the proposed amendments.

**Subdivision (e) - Compliance**

No change.

**Subdivision (f) – Monitoring, Testing, Recordkeeping and Reporting**

A clarification would be made to (f)(1)(D)(iii)(I) that states that a return to a more frequent emission check schedule would not be required when making adjustments to the oxygen sensor set points if the engine is in compliance with the applicable emission limits prior to and after the set points adjustments, notwithstanding the requirements of (f)(1)(D)(iii)(IV).

**Subdivision (g) – Test Methods**

No change.

**Subdivision (h) – Alternative Compliance Option**

- In lieu of complying with the applicable emissions limits by the effective dates specified in Table III-B, owners/operators of affected biogas-fired units that operate under long term fixed price power purchase agreements that have been entered into prior to February 1, 2008 and extend beyond January 1, 2016 may elect to defer compliance by up to two years and no later than January 1, 2018, provided the owners/operators submit an alternative compliance plan and pay a compliance flexibility fee to the Executive Officer at least 150 days prior to the applicable compliance date in Table III-B, and maintains an on-site copy of verification of the compliance flexibility fee payment and SCAQMD approval of the alternative compliance plan available upon request to SCAQMD staff.
- The alternative compliance plan would be required to include a completed SCAQMD Form 400A; attached documentation of unit permit ID, unit rated brake horsepower, and fee calculation; filing fee payment; and compliance flexibility fee payment. The SCAQMD Form 400 A would need to identify that the request is for a compliance plan and identification that the request is for the Rule 1110.2 Compliance Flexibility Fee option.
- The compliance flexibility fees associated with the alternative compliance plan would be applied to SCAQMD NOx reduction programs pursuant to protocols approved under SCAQMD rules.

**Subdivision (i) - Exemptions**

Exemption (i)(10) would be clarified to include engine shutdown periods, as well as, engine start up periods.

## **CONTROL TECHNOLOGIES**

### **Pre-combustion Biogas Cleanup Technologies**

Biogas, whether coming from a wastewater treatment plant digester or from a landfill, has many impurities, including but not limited to sulfur-containing compounds and siloxane, that require treatment (filtered, dewatered, and compressed) before combustion. If left untreated, raw biogas can damage engine components that may result in more maintenance and ultimately, over time, reduce the useful life of the engine. For example, siloxane can crystallize as silicon dioxide in the combustion stage and become deposited in fuel lines and engine parts. As a result, more frequent major maintenance on engines may be required to clean deposits from untreated biogas within the engine. Failure to perform this maintenance may result in catastrophic failure of an engine. The pretreatment of biogas is even more critical for catalyst-based after-treatment technologies for engines. If left untreated, impurities such as siloxane may result in the rapid poisoning of the catalyst downstream of the engine. Poisoning of catalysts is defined as the deposition of silica on the active sites of the catalyst which reduces the efficiency of the catalyst.

As described in the Interim Technology Assessment, there are two types of siloxane removal systems, regenerative and non-regenerative. Regenerative siloxane removal systems do not require constant removal of the sorbent material from its vessel. It is regenerated using a heated purge gas. Typically there are two vessels, so one can be regenerated, while the second vessel continues to clean siloxane. The Ox Mountain Landfill has the only regenerative siloxane removal system in use for the protection of a post-combustion catalyst. Ox Mountain Landfill is located at Half Moon Bay, California, which is within the Bay Area Air Quality Management District's (BAAQMD) jurisdiction. The landfill gas to energy site (operated by Ameresco) has six GE-Jenbacher engines, each rated at 2,677 brake horsepower that are fired on landfill gas. All six engines have been retrofitted with oxidation catalysts, while one of the engines also has an SCR system. A temperature swing adsorption (TSA) regenerative siloxane removal system manufactured by GE-Jenbacher is used. Two adsorption beds of regenerative activated carbon are alternatively regenerated by using heat. The gas cleanup and oxidation catalyst/SCR systems were commissioned in 2009 and have shown to be very effective in the removal of siloxane from the landfill gas. Performance data shows that the system is removing between 95 and 99 percent of inlet siloxane.

Non-regenerative siloxane removal systems require periodic replacement of the adsorbent material (activated carbon or silica gel) once it is spent. Two beds of adsorbent are used, so one can be recharged with fresh adsorbent while the other removes siloxane. These systems are sized to handle site-specific siloxane loads. Greater amounts of adsorbent are required for biogas streams with higher levels of siloxane. The amount of adsorbent must be able to handle intermittent spikes in the biogas stream.

### **Control Technology for Internal Combustion Engines Analyzed in the 2007 Final EA**

Potential impacts from using the following types of internal combustion engine control technologies were comprehensively analyzed in the 2007 Final EA previously certified by the SCAQMD Governing Board. As a result, even though operators of biogas-fueled engines affected by PAR 1110.2 may ultimately install these types of control technologies to comply with the emission reduction requirements, no further analysis of potential secondary impacts that may be generated by these control technologies is required. The following information is included for completeness only.

### **Catalytic Oxidation/Selective Catalytic Reduction**

Proven and effective technologies for CO, VOC, and NO<sub>x</sub> control among natural gas fueled lean-burn engines include catalytic oxidation with selective catalytic reduction. If the raw biogas is cleaned sufficiently and effectively, there is little danger of fouling any post combustion catalyst by siloxane deposition.

Catalytic oxidation removes CO and VOC by chemical reactions facilitated by the catalyst. Oxidation catalysts contain precious metals that assist CO and VOC to react with oxygen to produce CO<sub>2</sub> and water vapor. Catalytic oxidation can reduce CO and VOC emissions by greater than 90 percent.

SCR can be used with lean-burn engines since the higher oxygen concentrations in the exhaust preclude the use of less costly nonselective catalytic reduction (NSCR). SCR requires the injection of a reducing agent, typically urea or ammonia, to react with the NO<sub>x</sub> in the engine's flue gas, producing water vapor and nitrogen gas as the end products. The SCR catalyst promotes the reaction of urea or ammonia with NO<sub>x</sub> and oxygen, and is a very effective NO<sub>x</sub> control technology.

### **NO<sub>x</sub>Tech**

NO<sub>x</sub>Tech is another post combustion control technology, which does not require a catalyst, does not require gas cleanup, and is capable of achieving multi-pollutant control of NO<sub>x</sub>, VOC, and CO emissions. Engine exhaust gases enter the unit where the temperature is raised by a heat exchanger. The gases then enter a reaction chamber where a small amount of the engine's fuel is added to raise the gas temperature to between 1400 and 1500 degrees Fahrenheit. At this temperature the NO<sub>x</sub> reduction in the reaction chamber can occur using urea injection, while CO and VOC emissions are simultaneously incinerated. The system is designed to handle biogas that is of a lower Btu content than higher Btu content natural gas.

### **Biogas-fueled Engines – Replacement Technologies**

The cost of compliance (CEMS, I&M, add-on control technology, etc.) may make it less costly to remove the existing biogas-fueled ICEs and replace them with other technologies. These technologies include boilers, gas turbines, microturbines, fuel cells and biogas-to-LNG systems. Replacing ICEs with the technologies described below means they would no longer be subject to the requirements of PAR 1110.2, but may be subject to other source-specific rules or regulations such as Regulation XIII – New Source Review.

Potential impacts from replacing biogas-fueled engines with the following replacement technologies were comprehensively analyzed in the 2007 Final EA previously certified by the SCAQMD Governing Board. As a result, even though operators of biogas-fueled engines affected by PAR 1110.2 may ultimately install these types of replacement technologies to comply with the emission reduction requirements, no further analysis of potential secondary impacts that may be generated by these control technologies is required. The following information is included for completeness only.

### **Fuel Cells**

Fuel cells are an emerging technology capable of producing power with very low pollutant emissions without the utilization of combustion. Fuel cells can produce electricity much more

efficiently than combustion-based engines and turbines. A fuel cell uses a molten carbonate cell or other media to create an electrochemical reaction with the inlet biogas at the anode and oxygen from air at the cathode. Hydrogen is created in a reforming process at the anode, while carbonate ions are created at the cathode. The hydrogen gas reacts with the carbonate ions to produce water and electrons. These electrons flow through an external circuit that produces the electricity for the power plant.

The electrochemical reactions are produced in individual molten carbonate electrolyte stacks. The stacks are modular in design, so the total power production capacity of the generating plant can be tailored to accommodate several fuel cell stacks to meet the desired power output. The heat generated by the fuel cells can also be recovered and used to provide process heat. For instance, the recovered heat can be used to supply heat to a wastewater treatment plant's anaerobic digesters. The fuel cell stacks, however, are sensitive to impurities, so a biogas cleanup system is critical to maintain the performance of the fuel cell stacks. Siloxane can foul a fuel cell.

There are many fuel cell installations that run on natural gas, and there are also several in California that operate on biogas.

### **Flex Energy**

Flex Energy is a system that combines microturbine technology with that of regenerative thermal oxidation to produce power with an ultra low emissions profile and without the necessity of biogas cleanup. The system is capable of taking low Btu content biogas that would be otherwise incombustible by any engine or turbine and diluting it before introducing it to the thermal oxidizer that raises the temperature to destroy VOC and CO. The thermal oxidizer's temperature is also not raised high enough to facilitate the formation of thermal NO<sub>x</sub>. This process results in the consumption of methane gas without the pollutants from traditional combustion.

A typical internal combustion engine that runs on landfill gas will not operate efficiently if the methane content of the biogas drops below 35 to 40 percent. Landfills that produce gas with a methane content lower than what an engine typically needs to operate, will typically combust the gas with a flare. An advantage of the Flex Energy system is that it is capable of handling biogas with a methane content equivalent to and below a typical engine's range of consumption. An open landfill will often produce biogas with a constant amount of methane, roughly 50 percent. The other 50 percent of landfill biogas is typically CO<sub>2</sub>. However, once a landfill ceases to accept municipal solid waste, the amount of biogas produced by the landfill will gradually begin to decay and the methane content will decline. A Flex Energy system can consume landfill gas well after a landfill closes at a lower methane content compared to other types of engines.

Another advantage with this type of system is that it does not require a fuel cleanup system for siloxane and other impurities. Like the fuel cells, these systems can be modularly applied, based on the inlet characteristics of the biogas and desired power output.

### **Other Combustion Technologies Analyzed in the 2007 Final EA**

Potential impacts from replacing biogas-fueled engines with the following types of combustion technologies were comprehensively analyzed in the 2007 Final EA previously certified by the SCAQMD Governing Board. As a result, even though operators of biogas-fueled engines affected by PAR 1110.2 may ultimately install these other types of technologies to comply with



the emission reduction requirements, no further analysis of potential secondary impacts that may be generated by these control technologies is required. The following information is included for completeness only.

Traditional gas turbines, microturbines and boilers fall under this category and typically have lower emission profiles overall than biogas-fueled engines. Several landfills in the Basin currently employ the use of gas turbines for combustion of the biogas and also require extensive gas cleanup to protect the turbine blades from siloxane buildup. For example, the Calabasas Landfill operated by Los Angeles County Sanitation District and the Brea-Olinda Landfill currently use gas turbine technology with gas cleanup for handling landfill produced biogas. Traditional boilers can also process biogas and currently are being used by both landfills and wastewater treatment plants across the basin. For example, if a facility that operates both engines and boilers chooses to shut down its engines, the remaining biogas can usually be handled by its boilers and any excess can be routed to the existing facility flare, if necessary. Boilers are less sensitive to impurities and do not require extensive gas cleanup.

### **Liquefied Natural Gas (LNG) Facilities**

Potential impacts from replacing biogas-fueled engines with LNG facilities were comprehensively analyzed in the 2007 Final EA previously certified by the SCAQMD Governing Board. As a result, even though operators of biogas-fueled engines affected by PAR 1110.2 may ultimately install these types of control technologies to comply with the emission reduction requirements, no further analysis of potential secondary impacts that may be generated by these control technologies is required. The following information is included for completeness only.

Biogas-to-LNG systems convert biogas to LNG and CO<sub>2</sub>. LNG is created when natural gas is cooled to minus 260 degrees Fahrenheit, reducing six-hundred cubic feet of gas into one cubic foot of liquid methane. This process consists of several stages of compression and cooling. LNG plants would consist of a power generation building, programmable logic control/motor control center building, compression skids, refrigeration skids, liquefier skids, storage tanks and loading equipment. The plant is typically composed of vessels, compressors, pipes, valves, filters, coolers, instruments and process components in six modules: purification, CO<sub>2</sub> removal, refrigeration, liquefaction and post purification, instrument air, and controls. An LNG storage and dispensing system is needed to transfer LNG from the facility to trucks.

The LNG facility at the Frank R. Bowerman Landfill in Irvine, California was used as a basis for the analysis in the 2007 Final EA.<sup>2</sup> The Bowerman facility uses biogas-fueled turbines to supply power to the LNG facility. Since LNG systems are assumed to replace existing ICEs at affected facilities, it was assumed that facility operators who choose to install LNG plants in place of existing ICEs would use electricity from the power grid. Since the LNG facility would require some energy in the form of heat, it was assumed that operators who replace existing ICEs at affected facilities would install boilers to generate heat for the facility.

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<sup>2</sup> Prometheus Energy Company, Bowerman I Natural Gas Process Facility Project Description, prepared for SCAQMD, undated.

The Bowerman facility has a LNG storage tank that can store five days worth of LNG generated at the facility. Dr. John Barclay of Prometheus Energy has stated that typical design of LNG storage tanks includes a capacity of three days.<sup>3</sup>

### **Flares**

All facilities in the district that would be subject to PAR 1110.2 currently use flares onsite, either as one means of controlling landfill gas or as a backup to other types of biogas control or combustion technologies for use in event of emergency shutdowns or shutdowns for maintenance. Replacing existing biogas-fueled engines with flares, which means the equipment would no longer be subject to Rule 1110.2, was considered for analysis in the 2007 Final EA, but was rejected because, at the time, it was considered to be unlikely that operators of biogas-fueled engines would remove the biogas-fueled engines in favor of using flares. Recent information indicates that there is a potential to replace biogas-fueled engines with flares. Consequently, the analysis of potential adverse environmental impacts from switching from biogas-fueled engines to flares as a result of adopting PAR 1110.2 is the main focus of this Addendum. Therefore, the following paragraph provides a brief description of a landfill gas flare.

The major components of a flare are gas burner, stack, liquid trap, controls, pilot burner, and ignition system. Some flares are equipped with automatic pilot ignition systems, temperature sensors, and air and combustion controls. Flare combustion efficiency is related to flame temperature, residence time of gases in the combustion zone, turbulent mixing of the combustion zone, and amount of oxygen available for combustion. The temperature of exhaust gases from flares can range from 1,000 to 2,000 degrees Fahrenheit.

Flares are often the last resort for any facility that handles biogas, but cannot combust it with other means because of an insufficient quantity or methane content. With flaring, a facility can achieve VOC destruction from combustion, while many newer BACT flares achieve low NOx emissions. Although flares are used to combust methane to produce CO<sub>2</sub>, which has a lower global warming potential, PAR 1110.2 has the potential to create CO<sub>2</sub> emission impacts, which will be discussed elsewhere in this document.

### **DISCUSSION AND EVALUATION OF ENVIRONMENTAL IMPACTS**

Implementation of the biogas-fueled engine NOx concentration limits adopted in 2008 were conditional on preparation of a technology assessment verifying that the NOx concentration limits could be achieved by affected engines. Further, the technology assessment was required to be presented to the Governing Board at the July 2010 Public Hearing. Because the technology assessment was not completed in time for the July 2010 Public Hearing, the biogas-fueled engine NOx concentration limits did not become effective; therefore, the NOx concentration limits from the previous version of Rule 1110.2 remained in effect. As a result, NOx emission reductions associated with biogas-fueled engines cannot be claimed for the 2008 amendments to Rule 1110.2. Consequently, adopting NOx concentration limits for biogas-fueled engines with later compliance dates than those in the 2008 amendments to Rule 1110.2 means that previously quantified emission reductions for biogas-fueled engines are not considered to be foregone or delayed.

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<sup>3</sup> Phone conversation between Dr. John Barclay, Chief Technology Officer of Prometheus Energy Company and James Koizumi of SCAQMD, August 1, 2007.

The December 2007 Final EA assumed that operators of biogas-fueled ICEs would retrofit their engines with SCRs and catalytic oxidization systems or NOxTech systems. However, the December 2007 Final EA also evaluated the environmental impacts from the replacement of biogas-fueled ICEs with gas turbines, microturbines, or LNG plants. Options where landfill gas systems were replaced with LNG plants and digester gas systems with either turbines or microturbines were also evaluated. If, as part of the proposed amendments, operators choose to replace biogas-fueled ICEs with any of the above identified technologies, potential adverse environmental impacts from the technologies evaluated in the December 2007 Final EA would be the unchanged, although they would occur later because of the proposal to set the final compliance date as January 1, 2016 or January 1, 2018 under the alternative compliance option. Therefore, because impacts from the above technologies were already analyzed in the 2007 Final EA and are not expected to change as a result of adopting the currently proposed amendments to Rule 1110.2, they will not be considered further in this Addendum.

Flares are currently used as a means to control landfill gas at a number of affected facilities in the district. Flares are also located at facilities with biogas-fueled ICEs to combust the biogas in the event the biogas-fueled ICEs are not operating due to maintenance or breakdowns. Replacing existing biogas-fueled engines with flaring, means the biogas equipment would no longer be subject to Rule 1110.2, since Rule 1110.2 applies only to ICEs. Replacing biogas-fueled ICEs with flares was not analyzed in the 2007 Final EA because it was assumed biogas-fueled ICEs would be able to comply with the final emission concentration limits by using the new provision that allows biogas facilities to use more than 10 percent natural gas in biogas-fueled engines. Further, the technology assessment was expected to provide regulatory relief in the event that the results demonstrated that biogas-fueled ICEs could not comply with the final compliance limits.

More recently, feedback from Rule 1110.2 stakeholder working group indicated that, because of the potential difficulty that biogas-fueled engines may have in complying with the final NOx concentration requirements, operators may consider replacing affected engines with flaring biogas with existing flares, as flaring biogas is not prohibited under any existing SCAQMD regulations. The reason for this assertion is that some biogas-fueled engines are reaching the end of their useful lives and it would not make economic sense to retrofit engines that will need to be replaced within a relatively short period of time. Further, the quality of biogas (methane content) at some landfill gas facilities is declining, so it will be more difficult to combust this biogas in biogas-fueled ICEs. So, rather than retrofit existing biogas-fueled ICEs to comply with Rule 1110.2 during the period of declining biogas quality, it may be more economical to replace them with flaring. Therefore, the following analysis of potential adverse environmental impacts from adopting PAR 1110.2 focuses primarily on potential secondary adverse environmental impacts from replacing biogas-fueled engines with flaring and whether or not impacts are within the scope of the environmental analysis in the 2007 Final EA. However, all environmental topic areas from the environmental checklist (CEQA Guidelines, Appendix G) were evaluated to ensure that no potential impacts from adopting PAR 1110.2 are overlooked.

PAR 1110.2 includes an alternative compliance option for private owners/operators of biogas-fired engines with emission concentration limits in Table III-B. Under the alternative compliance option, private owners/operators of affected biogas-fired engines could elect to defer compliance with the emission limits in Table III-B by up to two years. PAR 1110.2 states that the funds collected from the compliance flexibility fee would be applied to NOx reduction programs pursuant to protocols approved under SCAQMD rules. Since all SCAQMD rules undergo

CEQA review prior to adoption any environmental impacts from NO<sub>x</sub> reduction programs pursuant to protocols approved under SCAQMD rules have been evaluated, disclosed and mitigated if necessary. It goes without saying that any expenditure of Rule 1110.2 funds would be consistent with the CEQA analyses for the protocols approved under SCAQMD rules, so that no expenditure would be allowed if it would cause any exceedance of what was analyzed in the associated CEQA documents.

The NO<sub>x</sub> reduction programs funded by the compliance flexibility fees under PAR 1110.2 are likely to be similar to the GHG reduction protocols under Rule 2702 – Greenhouse Gas Reduction Programs associated with combustion processes, since these GHG reduction protocols also reduce NO<sub>x</sub> emissions. GHG reduction protocols from Rule 2702 that would also reduce NO<sub>x</sub> emissions include:

- Boiler efficiency protocols – this protocol includes the installation of economizers or oxygen trim systems. Economizers are heat exchangers installed in flue gas ductwork between the boiler outlet and stack, which cools the flue gas. Oxygen trim systems add more precise air control based on a fuel flow sensor, electronic controller and servo-based damper positioner to reduce the amount of excess air.
- Lawn mower protocol – this protocol offers cordless electric lawn mowers to consumers at a subsidized price in exchange for old operable gasoline powered lawn mowers.
- Leaf blower protocol – this protocol offers four-stroke engine leaf blowers to professional gardeners/landscapers at a subsidized price in exchange for old operable two-stroke engine leaf blowers.
- Truck stop electrification protocol – this protocol provides funds to install external sources of heating, ventilation and air conditioning at truck stop locations. The units are attached into the side window of truck cabs at locations where trucks stop in lieu of using the truck auxiliary engines for cooling and heating. The units are powered by fixed electrification structure or trusses over truck parking spaces.

Impacts from these protocols were analyzed in the Final Program EA for Proposed Rule 2702 – Greenhouse Gas Reduction Programs (SCAQMD No. 081104MK, State Clearinghouse No., 2008111002) dated December 31, 2008, and determined not to be significant for any environmental topic. At that time the analysis assumed up to \$2.8 million per year might be spent on any one of these protocols, yet the impacts would not be significant. SCAQMD staff estimates that no more than 2.5 million per year (\$5,394,848 total over two years) would be obtained in compliance flexibility fees under Rule 1110.2. If significantly more money was obtained expenditures could be limited so that the 2.8 million per year analyzed would not be exceeded. Therefore impacts using these protocols under PAR 1110.2 would also not be significant. Since PAR 1110.2 would not result in emissions foregone or delayed, there is no need for any compliance flexibility fees submitted to the SCAQMD to achieve a particular amount of NO<sub>x</sub> emission reductions to avoid potentially significant air quality impacts from NO<sub>x</sub> emissions foregone or delayed. Therefore, any NO<sub>x</sub> emission reductions and any other associated emission reduction co-benefits that would occur through applying the compliance flexibility fees to protocol programs identified in PAR 1110.2 would be solely for the benefit of environment. Therefore, together with other anticipated uses of Rule 2702 protocols, NO<sub>x</sub> reduction programs funded by PAR 1110.2 compliance flexibility fees are expected not exceed the usage assumed in the 2008 Program EA for Rule 2702.

### **Aesthetics**

PAR 1110.2 would include the same NOx concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NOx compliance dates to either January 1, 2016, or January 1, 2018, depending on whether the owners/operators elect and qualify for the alternative compliance option. The analysis of the currently proposed amendments concluded that aesthetics impacts would be no greater than the significant adverse aesthetic impacts identified in the 2007 Final EA. The conditions that contributed to significant adverse aesthetics impacts in Final 2007 EA would not occur with replacing existing biogas-fueled ICEs with flares for the following reasons.

Flaring biogas in lieu of complying with the 2008 amendments to Rule 1110.2 was not expected to occur and; therefore, was not fully evaluated in the 2007 Final EA. All existing biogas facilities have flares that are used to burn biogas when biogas-fueled engines are not operating. Although, initially it was assumed in the 2007 Final EA that adding new flares may further degrade the existing visual character of the facility, it was concluded that this impact would not occur because information industry representatives indicated that removing biogas-fueled ICEs and flaring biogas instead, would occur in existing flares at existing affected facilities (i.e., no new flares are expected to be built). Because the existing biogas-fueled flares have covers, no open flames are visible outside of the flares.

In addition to flares, affected digester gas facilities have emergency standby generators that can be used to support the plant during emergencies. In the event that biogas-fueled ICEs are replaced by flares, emergency standby generators would continue to operate only during emergencies. Therefore, no new emergency standby generators are expected to be necessary. However, if new emergency standby generators are installed, they are expected to be dropped into place and to look similar to the existing biogas-fueled ICEs and/or existing emergency standby generators. For these reasons, the April 20, 2007 NOP/IS for the 2007 Final EA concluded that no new aesthetics or light and glare impacts would occur. This conclusion would continue to be the case for PAR 1110.2. This situation is different compared to the circumstances that contributed to significant adverse aesthetics impacts identified in the 2007 Final EA as summarized below.

The 2007 Final EA included an evaluation of replacing existing biogas-fueled ICEs with biogas-to-LNG facilities, gas turbines, microturbines or boilers. Although turbines, microturbines and boilers are similar in physical characteristics to ICE systems, because of space issues, and location of utilities, location and quality of biogas sources, and piping; aesthetic impacts may be significant if new equipment is located near the property boundary or, in the case of biogas-to-LNG facilities, large process equipment and truck loading racks may be visible from outside of the facility. Further, if the process equipment operates at night there may be a need for additional lighting. Therefore, the 2007 Final EA determined that installation of a biogas-to-LNG facility may significantly alter the aesthetics of an existing facility.

To the extent that affected facility operators replace biogas-fueled ICEs with turbines, microturbines, and boilers, potentially significant adverse impacts would be delayed three and a half to six years depending on whether the owners/operators elect and qualify for the alternative compliance option. However, this impact was previously analyzed in the 2007 Final EA. Replacing biogas-fueled ICEs with flares, is potentially the case under PAR 1110.2, would not

create new significant adverse effects on scenic vistas; would not add new substantial damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; would not add new substantial degradation to the existing visual character or quality of the site and its surroundings; or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Based upon the above considerations, the proposed project would not create new aesthetics impacts or make substantially greater significant adverse aesthetics impacts identified in the 2007 Final EA. Since no new significant or substantially worse adverse aesthetics impacts were identified, no mitigation measures are necessary or required.

### **Agriculture and Forest Resources**

PAR 1110.2 would include the same biogas NO<sub>x</sub> concentration limits previously proposed for July 1, 2012 with effective dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. Analysis of the 2008 amendments to Rule 1110.2 in the April 20, 2007 NOP/IS concluded that the 2008 project would not generate any agricultural resources impacts. Any replacement or retrofit construction would occur at existing commercial or industrial facilities. No comments were received on the NOP/IS that refuted this conclusion, so this topic was not analyzed further in the 2007 Final EA.

Potential impacts to forestry resources were not evaluated in the 2007 Final EA because this topic was not added to the environmental checklist until the year 2010, which was after the 2007 Final EA was certified. Biogas-fueled engines are located at existing facilities, and any construction or operation is expected to occur on-site. Therefore, PAR 1110.2 is not expected to have forestry impacts. With regard to the currently proposed project, no impacts to agricultural or forestry resources are anticipated as explained below.

Flaring biogas in lieu of complying with the 2008 amendments to Rule 1110.2 was not expected to occur and; therefore, was not fully evaluated in the 2007 Final EA. However, since any biogas flaring in lieu of complying with PAR 1110.2 would occur using existing biogas-fueled flares, flaring would also occur on-site at existing facilities. PAR 1110.2 may result in the early removal of the biogas-fueled ICEs, but the similar impacts were evaluated under other equipment replacement scenarios and it was concluded in the 2007 Final EA that no impacts to agriculture would occur. This conclusion would continue to apply to the currently proposed project, even in the event that biogas-fueled ICEs are removed at a later date. The removal of the biogas-fueled engines is not expected to affect agricultural or forestry resources since the engines are placed on concrete pads on-site.

Digester gas facilities have emergency standby generators that can be used to support the plant during emergencies. Although no new emergency standby generators are expected to be needed, if existing emergency standby generators are replaced with new emergency standby generators, they are expected to be dropped in place within the boundaries of existing biogas facilities.

Therefore, based on the above information, PAR 1110.2 would not convert farmland to non-agricultural use; or conflict with existing zoning for agricultural use, or a Williamson Act contract. Therefore, it is not expected that PAR 1110.2 would conflict with existing zoning for, or cause rezoning of, forest land; or result in the loss of forest land or conversion of forest land to non-forest use. Consequently, the proposed project would not create new significant adverse

agriculture or forestry impacts or make substantially greater significant adverse impacts identified in the 2007 Final EA. Since no significant or substantially worse adverse agriculture or forestry resources impacts were identified, no mitigation measures are necessary or required.

## **Air Quality and Greenhouse Gas Emissions**

### ***Conflict with an Applicable Air Quality Plan***

The 2007 NOP/IS concluded that the 2008 amendments to Rule 1110.2 would contribute directly to carrying out the goals of the 2007 AQMP by implementing, in part, control measure MSC-01 – Facility Modernization. Because it is expected to reduce NO<sub>x</sub>, VOC and CO emissions from all affected source categories, which in turn, would contribute to attaining the state and federal ambient air quality standards. Thus, adopting the 2008 amendments to Rule 1110.2 was not expected to conflict or obstruct implementation of the applicable AQMP. PAR 1110.2 would not obstruct or conflict with the implementation of the AQMP because, overall, Rule 1110.2 achieves net emission reductions. The emission reductions from stationary engines fired by biogas were not included in the SIP submittal and so did not contribute to the SCAQMD's efforts to attain national ambient air quality standards. However, emission reductions resulting from PAR 1110.2 are expected to contribute to the SCAQMD's ambient air quality standards attainment efforts.

### ***Criteria Pollutants***

#### **Summary of the Criteria Pollutant Analysis in the 2007 Final EA**

To provide a worst-case analysis, the 2007 Final EA assumed that construction to install control equipment on biogas-fueled ICEs or replace existing biogas-fueled ICEs with other biogas control technologies and operation of controlled or replaced equipment would overlap in the year 2012. For non-biogas-fueled ICEs construction to install control equipment and operation of affected engines were expected to occur and overlap in the years 2008 through 2011. Therefore, potential emission impacts from PAR 1110.2 were compared to the worst-case emissions estimated for 2012 in the 2007 Final EA, the year biogas-fueled ICEs would be retrofitted with control technologies or replaced by other technologies not subject to PAR 1110.2.

The 2007 Final EA included an analysis of overlapping construction and operational criteria pollutant emissions from four worst-case scenarios: 1) the addition of after treatment on biogas-fueled ICEs, 2) the replacement of biogas-fueled ICEs with gas turbines, 3) the replacement of biogas-fueled ICEs with microturbines, 3) the replacement of biogas-fueled ICEs with gas turbines at digester gas facilities and LNG facilities at landfill gas facilities, and the replacement of biogas-fueled ICEs with microturbines at digester gas facilities. Because of space issues, it was deemed impractical for biogas-fueled facility operators to install LNG equipment at landfill gas facilities. Since impacts from the above technologies have already been analyzed, the analysis of PAR 1110.2 will focus on air quality impacts associated with replacing biogas-fueled ICEs with existing flares.

### ***Construction Impacts***

All facilities that operate biogas-fueled ICEs also have existing flares that are operated when the biogas-fueled ICEs are not operating either in emergency situations or when biogas-fueled ICEs are offline for maintenance. Since biogas facilities have existing flares that can be used to flare all biogas from the facilities during emergencies or maintenance, replacing existing biogas-fueled ICEs with flares would not require new flares to be installed because of PAR 1110.2.

Facility operators may remove existing ICEs before the end of their useful operating life to avoid costs associated with replacing engines that would only operate a few years until the existing replacement flares begin operating full time. If operators choose to replace biogas-fueled engines with flares before the end of their useful life, potential demolition air quality impacts, would likely occur earlier, but no new adverse demolition air quality impacts are expected, they would simply occur sooner. In addition, demolition of existing biogas-fueled engines would be no greater than the worst-case construction air quality impacts evaluated in the 2007 Final EA, which was removing an entire existing biogas-fueled engine system and installing a LNG plant.

The 2007 Final EA assumed that emergency backup engines would be installed at digester gas facilities that replaced existing biogas-fueled engines with alternative technologies that do not generate electricity. Subsequent to the adoption of the 2008 amendments, it was determined that all digester facilities already have existing diesel emergency engines for the same reasons they have flares, i.e., when the biogas-fueled ICEs are not operating either in emergency situations or when biogas-fueled ICEs are offline for maintenance. To be conservative, the 2007 Final EA evaluated construction emissions from replacing existing diesel emergency standby engines with new diesel emergency standby engines are included in the analysis of overlapping construction and operation air quality impacts. Construction emissions only from replacing existing diesel emergency standby engines with new diesel emergency standby engines are presented in Table 2.

**Table 2  
Secondary Construction Criteria Pollutant Emissions Potentially Associated with Flaring Operations in Lieu of Complying with PAR 1110.2**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Construction Emissions from Installing Emergency Standby Engines <sup>a</sup>	53	22	6.4	0.02	2.7	2.7

a) Source: Table 4-34 – Criteria Construction Emissions for Biogas and Non-biogas Facilities from Installing SCR, Gas Turbines or Microturbines at All Biogas Facilities of the 2007 Final EA, year 2012. It was assumed that construction emissions from installing control equipment were equivalent to installing a new emergency standby engine.

***Operational Impacts***

*Direct Air Quality Impacts from Flaring*

Flaring biogas in lieu of complying with PAR 1110.2 was not evaluated in the 2007 Final EA. Any flaring of biogas in lieu of complying with PAR 1110.2 would occur in existing flares and would displace combustion in biogas-fueled ICEs. Flaring biogas would generate criteria pollutant emissions from the combustion of the biogas in the flares rather than in the biogas-fueled ICEs. Direct criteria pollutant emissions from daily flaring are presented in Table 3. The direct flare emissions shown in Table 3 were derived using the same biogas emissions usage rates that were used to quantify direct emission from biogas-fueled ICEs complying with the concentration limits in the 2008 amendments to Rule 1110.2 and analyzed in the 2007 Final EA. NO<sub>x</sub>, CO and VOC emissions were estimated using emission factors developed from source test results. SO<sub>x</sub> emissions from flares would be the same as those from ICEs because SO<sub>x</sub> is generated by the sulfur content of the fuel, which would be the same regardless of combustion



equipment. Based on source tests, the PM emissions from flares would be the similar to those from ICEs.

**Table 3  
Criteria Pollutant Emissions Generated by Flaring Operations  
in Lieu of Complying with PAR 1110.2**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5, lb/day
Direct Emissions from Flaring Biogas <sup>a</sup>	683	1,402	427	464	136	136
Emissions from Additional Electricity Generation <sup>b</sup>		431	35		45	45
Secondary Emergency Standby Engines <sup>c</sup>	42	114	12	0.42	3.6	3.6
<b>Total Emissions from Flaring Operations</b>	<b>725</b>	<b>1,947</b>	<b>474</b>	<b>464</b>	<b>185</b>	<b>185</b>

- a) Direct emissions from flaring biogas are total daily flare emissions and do not take into consideration baseline combustion emissions.
- b) Source: Table 4-15 of the 2007 Final EA for PAR 1110.2.
- c) Source: Table 4-19 of the 2007 Final EA for PAR 1110.2

*Secondary Air Quality Impacts from Flaring*

Biogas-fueled ICEs are typically used to generate electricity for onsite equipment and may sell any excess electricity to the electricity grid. In addition to backup flares all facilities that operate biogas-fueled ICEs also operate emergency backup generators to produce electricity in the event that the biogas-fueled ICEs are not operating due to emergencies or maintenance. In such situations, the emergency backup generators would need to operate to continue supplying electricity to onsite equipment.

If all of the biogas is flared instead of being combusted in the biogas-fueled ICEs, then the facility would need electricity from the grid to power operations currently powered by the existing biogas-fueled ICEs. The electricity needed at a facility that replaces biogas-fueled ICEs with flares would only need to be equivalent to the amount formerly generated by the existing ICEs. However, as demonstrated in the 2007 Final EA, replacing biogas-fueled ICEs with LNG plants would require additional energy from the grid, not only to operate existing onsite equipment, but to operate the new LNG plant. Table 3 presents the estimated criteria pollutant emissions from the 2007 Final EA for power plants generating electricity necessary to operate equipment at biogas facilities that replace biogas-fueled ICEs with flares.

In addition to quantifying emission for facilities that replace biogas ICEs with alternative technologies that do not generate electricity in lieu of complying with PAR 1110.2, the 2007 Final EA also analyzed emissions from emergency standby diesel engines. Although, SCAQMD staff has determined that digester gas facilities already have existing diesel emergency standby engines, to provide a conservative analysis it was assumed that facility operators who flare biogas in lieu of complying with PAR 1110.2 would also install new diesel emergency standby engines. Table 3 presents the criteria emissions from diesel fueled emergency standby engines from the 2007 Final EA for biogas facilities.

**Total Criteria Emission Impacts from Flaring**

*2007 Final EA and Proposed Project Baselines*

The emission estimates in the 2008 Final Staff Report and 2007 Final EA for the baseline and the project were based on a combination of rule limits, and source test values, which were lower than the emission limits in the existing and proposed project versions of Rule 1110.2. During the current rule making for this proposed project, emissions estimated in the Staff Report were based on the existing Rule 1110.2 and PAR 1110.2 emission limits. The baselines from the 2007 Final EA and the proposed project are presented in Table 4. Because the 2007 Final EA emission estimates for baseline include source test emissions (closer to actual emissions), they are lower than those estimated for the proposed project in the Staff Report for PAR 1110.2 (potential emissions), the baseline emissions estimate in the 2007 Final EA would result in fewer emission reductions (emission reductions are estimated by subtracting the project emissions from the baseline), which is conservative. Therefore, the 2007 Final EA emission baseline was used for this analysis.

**Table 4  
2007 Final EA and Baseline and Baseline Based on Existing Rule 1110.2 Emission Limits**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day
2007 Final EA (Source Test and Emission Limits)	1,859	9,555	882
Existing Rule 1110.2 Limits Only	2,600	51,200	1,600

*Criteria Pollutants from Flaring Operations in Lieu of Complying with PAR 1110.2*

The total criteria pollutant emissions from flaring operations (including secondary emissions) are presented in Table 5. The total criteria pollutant emissions include both construction and operational emissions, since it is possible that construction and operation could overlap.

**Table 5  
Evaluation of Criteria Emissions Generated by Flaring Operations  
in Lieu of Complying with PAR 1110.2**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Biogas Baseline Emissions <sup>a</sup>	1,859	9,555	882	464	136	136
Flare Related Construction Emissions <sup>b</sup>	53	22	6.4	0.02	2.7	2.7
Flare Related Operational Emissions <sup>c</sup>	725	1,947	474	464	185	185
Difference in Emissions <sup>d</sup>	(1,081)	(7,586)	(402)	0.02	52	52
Significance Threshold	55	550	55	150	150	55
Significant?	No	No	No	No	No	No

a) Biogas-fueled engine baseline from Table 3. 2007 Final EA biogas-fueled engine baseline.

b) Flare – construction criteria emissions from Table from Table 2

c) Flare – operational criteria emissions from Table from Table 3.

d) Difference in emissions = biogas baseline emissions – (flare related construction emissions + flare related operational emissions.)

Numbers in parentheses represent emission reductions.

Emissions from flaring in lieu of complying with PAR 1110.2 are compared to existing emission from biogas-fueled ICEs in Table 5. The difference between criteria pollutant emission generated by flaring operations in lieu of complying with PAR 1110.2 and existing biogas-fueled ICEs were compared to the operational significance thresholds since construction and operations may overlap to be conservative (i.e., since operational significance thresholds are more stringent than construction significance thresholds). Flaring operations in lieu of complying with PAR 1110.2 would generate lower NO<sub>x</sub>, CO and VOC emissions than the existing biogas-fueled engines (i.e., NO<sub>x</sub>, CO and VOC emission reductions). SO<sub>x</sub> (0.02 pounds per day), PM<sub>10</sub> (52 pounds per day) and PM<sub>2.5</sub> (52 pound per day) emissions would be greater than those generated by existing biogas-fueled ICEs because of secondary emissions, but would not exceed the significant thresholds for SO<sub>x</sub> (150 pounds per day), PM<sub>10</sub> (150 pounds per day) or PM<sub>2.5</sub> (55 pounds per day).

### ***Toxic Air Contaminants***

The flaring of biogas in lieu of complying with PAR 1110.2 was not examined in the 2007 Final EA. The flaring of biogas currently occurs at biogas facilities when biogas-fueled ICEs are not operating because of emergencies or for maintenance. Biogas-fueled engines and flares are tested at the inlet and outlet for Rule 1150.1 Table 1 and Table 2 compounds. Based on a review of Rule 1150.1 flares typically have greater destruction efficiency than biogas-fueled ICEs. Therefore, biogas flaring in lieu of complying with PAR 1110.2 would result in potentially lower toxic air contaminant (TAC) emissions.

The 2007 Final EA estimated that the worst-case carcinogenic health risk would occur if biogas-fueled ICEs are replaced with alternative technologies in lieu of complying with PAR 1110.2. Although affected facility operators who replace biogas-fueled ICEs with alternative technologies may also need to install emergency standby diesel engines to power the facility when the alternative technology is not operating, the 2007 Final EA indicated that biogas facilities already have existing diesel emergency standby generators that are only operated periodically to ensure operability. Taking a conservative approach it was estimated that the diesel emergency standby generators would be installed at affected facilities and could potentially generate a carcinogenic health risk of 3.4 in one million, which is less than the SCAQMD's cancer risk significance threshold of 10 in one million. Because affected facilities already have emergency standby diesel engines, the 3.4 in one million is considered to be a conservative estimate.

In the 2007 Final EA the worst-case cancer risk impacts analyzed would occur if affected biogas facility operators that have both biogas-fueled and natural gas-fueled non-biogas-fueled ICEs onsite and replaced them with electric motors and emergency standby diesel engines. The worst-case carcinogenic health risk replacing a natural gas-fueled non-biogas-fueled ICEs with electric motors and diesel emergency backup generators was calculated to be 18 in one million. This risk, when added to the risk of replacing an existing emergency standby diesel engine with a new engine, produced an estimated cancer risk of 21.4 in one million (3.4 in one million + 18 in one million). Therefore, the worst-case health risk of 21.4 in one million, which was determined to be significant in the 2007 Final EA, is substantially greater than the potential cancer risk of replacing existing biogas-fueled ICEs with flares.

Since PAR 1110.2 would not generate any new TAC emissions beyond what was already evaluated in the 2007 Final EA, PAR 1110.2 is expected to be less than significant for adverse TAC emission impacts and well within the scope of the cancer risk analysis in the 2007 Final EA.

***Cumulatively Considerable Impacts***

Since new adverse air quality impacts from implementing PAR 1110.2 are not expected to exceed any project-specific air quality significance thresholds, air quality impacts are not expected to be cumulatively considerable as defined in CEQA Guidelines §15064(h)(1).

***Odor Impacts***

The 2007 Final EA examined potential odor impacts from ammonia slip related to SCR units, diesel exhaust odor from additional diesel truck trips and from emergency standby diesel ICEs related to alternative technologies used in lieu of biogas-fueled ICEs. However, the odor impacts analysis in the 2007 Final EA concluded that there would be no significant adverse odor impacts.

The 2007 Final EA did not specifically evaluate potential odor impacts from replacing existing biogas-fueled ICEs with flares. Since the primary effect of adopting PAR 1110.2 is assumed to be replacement of biogas-fueled ICEs with flares, less than significant odor impacts from replacing biogas-fueled ICEs with other technologies or install control equipment evaluated in the 2007 Final EA would be unchanged. Further, replacing biogas-fueled ICEs with flares does not involve the use of ammonia and is not expected to affect operations or change the number of truck trips visiting affected facilities.

This analysis also assumed that those facility operators who replace biogas-fueled ICEs with flares would also install new emergency standby diesel engines as backups to provided electricity in the event of power outages. Emergency standby diesel engines are limited to 50 hours of operation per year for testing. Testing events typically don't last more than 30 minutes and usually no more frequently than once per week. Because of this limitation no odor impacts are expected.

For the above reasons PAR 1110.2 is not expected to generate significant adverse odor impacts or make an existing adverse impact substantially worse from replacing biogas-fueled ICEs with flares.

***Greenhouse Gas Impacts***

Global warming is the observed increase in average temperature of the earth's surface and atmosphere. The primary cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. The six major types of GHG emissions are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), haloalkanes (HFCs), and perfluorocarbons (PFCs). The GHG emissions absorb longwave radiant energy emitted by the earth, which warms the atmosphere. The GHGs also emit longwave radiation both upward to space and back down toward the surface of the earth. The downward part of this longwave radiation emitted by the atmosphere is known as the "greenhouse effect."

The current scientific consensus is that the majority of the observed warming over the last 50 years can be attributable to increased concentration of GHG emissions in the atmosphere due to human activities. Events and activities, such as the industrial revolution and the increased

consumption of fossil fuels (e.g., combustion of gasoline, diesel, coal, etc.), have heavily contributed to the increase in atmospheric levels of GHG emissions. As reported by the California Energy Commission (CEC), California contributes 1.4 percent of the global and 6.2 percent of the national GHG emissions (CEC, 2004). Further, approximately 80 percent of GHG emissions in California are from fossil fuel combustion (e.g., gasoline, diesel, coal, etc.).

The 2007 Final EA estimated GHG emissions from construction and operation assuming both full compliance with the 2008 amendments (i.e., without any electrification) and compliance with the 2008 amendments. The 2007 Final EA first evaluated cost estimates for replacing existing ICEs with electric motors in certain applications instead of incurring the costs of installing emissions controls and monitoring and inspection and maintenance (I&M) equipment that would be necessary to comply with PAR 1110.2. SCAQMD staff identified 225 nonbiogas engines where operators would incur lower compliance costs if they replaced them with electric motors and assumed that 75 percent of these engines (169) would voluntarily be replaced with electric motors. The analysis indicated that replacing all 169 nonbiogas engines with electric had the potential of reducing GHG emissions by 107,276 metric tons per year<sup>4</sup>. Further, the analysis also determined that if at least 15 ICEs were replaced with electric motors, there would be no additional GHG emissions generated by the 2008 amendments to Rule 1110.2. It was assumed that at least 15 of the 169 non-biogas-fueled ICEs would be replaced, so the 2008 amendments to Rule 1110.2 analyzed in the 2007 Final EA were assumed to be less than significant for GHG emissions. PAR 1110.2 is not expected to affect in any way replacement of nonbiogas engines with electric motors because the proposed amends only affect biogas-fueled ICEs.

Since GHG emissions are based on fuel usage, the GHG emissions from flaring biogas would be the same as combusting biogas in an ICE. Based on the analysis for the 2007 Final EA approximately 115.5 metric tons of CO<sub>2</sub> per year would be generated by power plants to support a facility that no longer generated electricity from biogas. The analysis also estimated that emergency standby engines would generate 307 metric tons of CO<sub>2</sub>. Therefore, replacing existing biogas-fueled ICEs with flares would be expected to generate GHG emission of approximately 423 metric tons per CO<sub>2</sub> would be generated, which is essentially the same as replacing existing biogas-fueled ICEs with other types of technologies and less than the SCAQMD significance threshold of 10,000 metric tons per year. Consequently, GHG emission impacts from PAR 1110.2 are within the scope of the analysis of GHG impacts in the 2007 Final EA.

Therefore, the proposed project would not substantially alter the conclusion in the 2007 Final EA that GHG significant adverse air quality impacts are not anticipated and, therefore, will not be further analyzed. Since no new significant adverse air quality impacts were identified, no mitigation measures are necessary or required.

Based upon these considerations, the proposed project would not make substantially worse any significant adverse air quality or GHG impacts detailed in the 2007 Final EA, significant adverse air quality or GHG emission impacts are not anticipated and, therefore, an addendum is the appropriate. Since no significant or substantially worse adverse air quality or GHG emission impacts were identified, no mitigation measures are necessary or required.

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<sup>4</sup> Does not include indirect GHG emissions from power plants or emergency engines.

## **Biological Resources**

PAR 1110.2 includes the same NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates to January 1, 2016 or January 1, 2018 under the alternative compliance option. The analysis of biological impacts from PAR 1110.2 would be same as those identified for the 2008 amendments to Rule 1110.2, which were not deemed significant in the 2007 Final EA. As stated in the 2007 Final EA all construction and operational impacts would occur on existing facilities. Any impacts to biological resources would only occur at a later date.

The flaring of biogas in lieu of complying with PAR 1110.2 was not evaluated in the 2007 Final EA. Any flaring of biogas in lieu of complying with PAR 1110.2 would occur at existing affected facilities using existing onsite flares. For fire safety reasons, the area around biogas-fueled flares is devoid of biological activity. Affected operators that flare biogas in lieu of complying with PAR 1110.2 may remove biogas-fueled ICEs. PAR 1110.2 may result in the early removal of the biogas-fueled engines, but the impacts would be the same as removing them at a later date. The removal of the biogas-fueled engines is not expected to affect biological resources since the engines are placed on concrete pads and the area around the ICEs would be void of biological activity for fire safety reasons.

Existing digester gas facilities have emergency standby generators that can be used to support the plant during emergencies if the biogas-fueled engines are replaced by flares. Landfill gas facilities typically do not use emergency standby generators. The 2007 Final EA assumed that emergency engines would be installed at digester gas facilities that replaced their ICEs with alternative technologies in lieu of complying with the existing rule. If emergency engines are installed at an affected facility, the impacts would be no greater than those analyzed in the April 20, 2007 NOP/IS for the 2007 Final EA. Therefore, no new impacts are expected to biological resources from emergency standby generators. The removal of the biogas-fueled engines is not expected to affect biological resources since the engines would be placed on existing concrete surfaces within the boundaries of existing biogas facilities and the area around the emergency standby generators would be void of biological activity for fire safety reasons.

As explained above, PAR 1110.2 would not create a new significant adverse effect or make an existing adverse impact substantially worse, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; have a new substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; have a new substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Based upon these considerations, the proposed project would not make substantially worse any significant adverse biological resource impacts detailed in the 2007 Final EA, significant adverse biological resources impacts are not anticipated and, therefore, an addendum is the appropriate. Since no significant or substantially worse adverse adverse biological resources impacts were identified, no mitigation measures are necessary or required.

### **Cultural Resources**

PAR 1110.2 includes the same biogas concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NOx compliance dates to January 1, 2016 or January 1, 2018 under the alternative compliance option. The analysis of cultural impacts from PAR 1110.2 would be the same as identified for the 2008 amendments to Rule 1110.2, which were not deemed significant for adverse cultural impacts in the April 20, 2007 NOP/IS for the 2007 Final EA. Any impacts to cultural resources would only occur at a later date.

The flaring of biogas in lieu of complying with PAR 1110.2 was not evaluated in the 2007 Final EA. All biogas flaring in lieu of complying with PAR 1110.2 would occur at existing affected facilities using existing biogas-fueled flares. If an operator flares biogas in lieu of complying with PAR 1110.2, they may also choose to remove the existing biogas-fueled ICEs. PAR 1110.2 may result in the early removal of the biogas-fueled engines, but the impacts would be the same as removing them at a later date. Demolition of biogas-fueled ICEs, is not expected to affect cultural resources, since the area around the biogas-fueled ICEs would have been previously disturbed (area graded, concrete slabs laid and ICEs and support equipment installed) to install the ICEs.

Existing digester gas facilities have emergency standby generators that can be used to support the plant during emergencies, if the biogas-fueled engines are replaced by flares. Landfill gas facilities typically do not use emergency standby generators. The 2007 Final EA assumed that emergency engines would be installed at digester gas facilities that replaced their ICEs with alternative technologies in lieu of complying with the existing rule. If emergency engines are installed at an affected facility, the impacts would be no greater than those analyzed in the 2007 Final EA. If new emergency standby generators are needed they are expected to be dropped in place within the boundaries of existing biogas facilities. Therefore, no new impacts are expected to cultural resources from emergency standby generators.

As explained above, PAR 1110.2 would not create a new significant adverse change in the significance of a historical resource as defined in §15064.5; cause a new substantial adverse change in the significance of an archaeological resource as defined in §15064.5; directly or indirectly destroy a unique paleontological resource, site, or feature; disturb any human including those interred outside formal cemeteries.

Based upon these considerations, the proposed project would not make substantially worse any significant adverse cultural resource impacts detailed in the 2007 Final EA, significant adverse cultural resources impacts are not expected from implementing PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse adverse cultural resources impacts were identified, no mitigation measures are necessary or required.

### **Energy Impacts**

PAR 1110.2 would include the same biogas NOx concentration limits previously proposed for July 1, 2012 with effective dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. As a result, potential adverse energy impacts associated with compliance options for biogas-fueled ICEs would be same as impacts analyzed for the 2008 proposed amendments to Rule 1110.2 in the 2007 Final EA, but energy impacts, which were deemed less than significant would be expected to occur at a later date.

### **Electricity Impacts**

The use of after treatment on ICEs was assumed to reduce efficiency of some ICEs due to pressure drops caused by the control devices. The 2007 Final EA concluded that this would result in a minor loss of electricity production (1,706 megawatt hours per year).

Alternative technologies used in lieu of complying with PAR 1110.2 (boilers, turbines and microturbines) generate more waste heat than ICEs, which reduces the amount of electricity produced. Replacing biogas-fueled ICEs with microturbines alone was determined to result in the greatest loss of electricity production (101,013 megawatt hours per year). The analysis in the 2007 Final EA assumed if an operator replaced ICEs with either a gas turbine and LNG plant or a microturbine and an LNG Plant, all electricity production would be lost and additional electricity from the power grid would be required to operate the LNG plant. The scenario where ICEs are replaced with microturbines at digester gas facilities and LNG plants at landfill gas facilities was estimated to result in a loss in electricity production and increased demand for electricity to operate the LNG plant of 404,133 megawatt hours per year. Adding the electricity production loss from replacing biogas-fueled ICEs with LNG plants to the electricity production loss from replacing non-biogas engines with electric motors (171,827 megawatt hours per year), the 2007 Final EA estimated that the worst-case electrical energy production loss would be 576,527 megawatt hours per year. However, a 576,527 megawatt hour per year loss was not deemed significant because it would be less than one percent of the 120,194 gigawatt hours per year available in southern California reported in the Final Program EIR for the 2007 AQMP.

Flaring biogas in lieu of complying with PAR 1110.2 was not evaluated in the 2007 Final EA because it was assumed that most operators would not choose to flare biogas, since electricity or heat generated by biogas-fueled ICEs is typically used to power operations onsite or, if electricity is produced in excess of onsite needs, sold to local utilities to be used offsite. Flaring of biogas in lieu of complying with PAR 1110.2 would likely occur at facilities where the quality of the biogas is poor (e.g., closed landfills) and/or the existing ICEs are at the end of their useful life, since it may not be cost effective to install after treatment or replacement engines with alternative technologies (biogas turbines, microturbines, biogas to LNG plants) once biogas concentrations become poor. Biogas flares would still be required as a safety measure at landfills with poor biogas concentrations.

If all biogas-fueled ICEs are replaced by flares, according to the 2007 Final EA, approximately 437,214 megawatt hours per year of energy production would be lost. The electricity loss from non-biogas-fueled ICEs identified in the 2007 Final EA was 171,827 megawatt hours per year, which would not be affected by PAR 1110.2. Therefore, the total loss of electricity from the non-biogas-fueled ICE requirements 2008 amendments to Rule 1110.2 and the current PAR 1110.2 if all biogas were flared would be 609,041 megawatt hours per year. This too would be less than one percent (0.5 percent) of the 120,194 gigawatt hours per year available in southern



California reported in the Final Program EIR for the 2007 AQMP. Therefore, if all biogas at closed landfills was flared in lieu of complying with the biogas portion of PAR 1110.2, energy impacts from implementing PAR 1110.2 would remain not significant.

### ***Natural Gas Impacts***

It was concluded in the 2007 Final EA that the 2008 amendments to Rule 1110.2 would result in a reduction of natural gas use because of the electrification of some of the non-biogas-fueled engines in lieu of complying with the amendments. If an operator uses the efficiency correction factor the amount of natural gas used in biogas-fueled engines would be restricted to 10 percent of the gas consumed in the existing ICEs. Once the biogas concentration limits become effective, there would be no limit on the percentage of natural gas burned in the 2008 amendments to Rule 1110.2. The proposed project would continue to allow the percentage of natural gas in the combustion fuel to be unrestricted once an affected ICE complies with the concentration limits of PAR 1110.2. Therefore, PAR 1110.2 is not expected to change the conclusion of no significant adverse natural gas impacts.

Flaring biogas in lieu of complying with PAR 1110.2 was not evaluated in the 2007 Final EA. Any biogas flaring in lieu of affected engines complying with PAR 1110.2 would occur in existing biogas-fueled flares. Since flaring would occur in existing biogas-fueled flares (all affected facilities have backup flares in the event of a shutdown of the affected engine), and flares can burn lower quality biogas than ICEs, flaring biogas in lieu of complying with PAR 1110.2 is likely to result in less natural gas use.

If the biogas-fueled engines are replaced by flares, digester gas facilities have emergency standby generators that can be used to support the plant during emergencies. Landfill gas facilities typically do not use emergency standby generators. Therefore, no new emergency standby generators are expected. However, if new emergency standby generators are needed they are expected to be dropped in place within the boundaries of existing biogas facilities. The 2007 Final EA estimated that approximately 5,023 million btu per year (0.013 million cubic feet per day) may be required at a single facility to fuel new emergency standby generators. The 2007 Final EA for the AQMP states that 1,474 million cubic feet of natural per day is used in the industrial sector in California. The consumption of 0.013 million cubic feet per day would be less than one percent (0.0009 percent) of the California industrial daily consumption, which is not considered significant.

### ***Diesel Fuel Impacts***

Additional diesel fuel was expected to be consumed during construction; from trips related to source testing, delivery, or hauling away of spent carbon or catalysts; and by diesel emergency generators depending on whether operators would comply with PAR 1110.2 or replace existing biogas-fueled ICEs with an alternative technology. It was determined in the 2007 Final EA that the maximum 3,218 gallons of diesel that may be consumed per day would be less than one percent (0.02 percent) of the 10 million gallons of diesel used in California and, therefore, was not considered to be significant.

The flaring of biogas in lieu of complying with PAR 1110.2 was not evaluated in the 2007 Final EA. All biogas flaring in lieu of complying with PAR 1110.2 would occur in existing biogas-fueled flares. In spite of the delay in emission limits for biogas fueled PAR 1110.2 may result in the early removal of biogas-fueled ICEs, if operators choose to flare biogas in lieu of complying

with PAR 1110.2. However, the removal of ICEs was included in the diesel fuel construction estimate in the 2007 Final EA, which determined diesel fuel impacts not to be significant. Existing digester facilities are expected to have emergency generators that can operate essential services at the facilities during emergencies. Landfill gas facilities do not use emergency generators. Therefore, no additional diesel is expected to be used. However, the use of diesel fuel (202 gallons per day) if facilities had to install new diesel emergency engines was evaluated in the 2007 Final EA, which determined diesel fuel impacts not to be significant.

### ***Renewable Resource Impacts***

Biogas is considered a renewable energy resource. Currently biogas-fueled ICEs generate electricity that is either used at the biogas facilities, sold to the electricity grid, or some combination of the two.

In-state renewable electricity generation (30,005 GWh) in California is 14.6 percent of the total electricity generated (205,018 GWh) in 2010.<sup>5</sup> In-state electricity from biomass (5,745 GWh) represents about 17 percent of the total renewable electricity capacity (30,005 GWh) in California. Of this 17 percent, approximately 32 percent of electricity produced from biopower is produced from the combustion of landfill (28 percent) and digester gas (four percent).<sup>6</sup> Senate Bill 1078 (SB 1078, Sher, Chapter 516, Statutes of 2002) established the California Renewables Portfolio Standard (RPS) program, which requires an annual increase in renewable generation by the utilities equivalent to at least one percent of sales, with an aggregate goal of 20 percent by 2017. In 2006, this target date was accelerated to 2010, and in 2011 the RPS was revised to require that renewable electricity should equal an average of 20 percent of the total electricity sold to retail customers in California during the compliance period ending December 31, 2013, 25 percent by December 31, 2016, and 33 percent by December 31, 2020.

It is assumed for this analysis that operators of biogas-fueled ICEs would flare biogas in lieu of complying with PAR 1110.2. The quality of landfill gas decreases after landfills close. In the long term operators of biogas-fueled ICEs at closed landfills may need to flare biogas instead of installing after treatment on existing biogas-fueled ICEs or replacing the ICEs with alternative technologies because the quality of the landfill gas (methane content) declines to the point where biogas-fueled ICEs cannot combust the landfill gas to provide electricity, whereas flares would still be able to combust the landfill gas at low methane content levels. Since it is likely that biogas-fueled ICEs at closed landfills would eventually be replaced with flares anyway when the landfill gas quality becomes poor, PAR 1110.2 may only result in an earlier transition from burning biogas in engines to burning biogas in flares.

Based on a conversation with CEC staff,<sup>7</sup> SCAQMD staff used the California Biomass Collective's biomass facility database to estimate the gross capacity in megawatts of ICEs at closed landfills. Based on closure information in the CalRecycle Solid Waste Information System<sup>8</sup> and capacity data in biomass facility database approximately 29.9 megawatts of

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<sup>5</sup> CEC, Energy Almanac, Total Electricity System Power, 2010 Total System Power in Gigawatt Hours [http://energyalmanac.ca.gov/electricity/total\\_system\\_power.html](http://energyalmanac.ca.gov/electricity/total_system_power.html)

<sup>6</sup> CEC, Table 2-3: Summary of In-State Biopower Capacity, 2011 Bioenergy Action Plan, CEC-300-2011-001-CTF, March 2011, <http://www.energy.ca.gov/2011publications/CEC-300-2011-001/CEC-300-2011-001-CTF.PDF>

<sup>7</sup> Conversation with Mr. Prab Sethi of the CEC on March 14, 2012.

<sup>8</sup> CalRecycle, Solid Waste Information System, <http://www.calrecycle.ca.gov/SWFacilities/Directory/>, March 14, 2012

capacity<sup>9</sup> is available at closed landfills in the district. The 2011 Bioenergy Action Plan estimates that there was 1,528 megawatts of bioenergy capacity in 2010 with another 1,311 megawatts in proposed projects for a total of 2,839 megawatts of capacity by the end of 2012. The 29.9 megawatts of capacity at closed biogas facilities would be less than one percent (0.5 percent) of the 2,839 megawatts of bioenergy expected by the end of 2012. It is conservative to assume that capacity at all closed biogas facilities would be lost because of flaring in lieu of complying with PAR 1110.2. Based on the CEC’s December 2011 Lead Commissioner Report – Renewable Power in California: Status and Issues,<sup>10</sup> new photovoltaic, solar thermal and wind projects are expected to generate most of the renewable energy in California (see Table 6). Therefore, based on the above analysis, the amount of renewable energy lost because of operators flaring biogas in lieu of complying with PAR 1110.2 is not expected to generate a significant adverse impact or make substantially worse a significant adverse impact to renewable energy.

**Table 6  
Renewable Projects Permitted in 2010 by California County (in Megawatts)**

County	Bio	Cogen	Geo	Photo-voltaic >20MW	Photo-voltaic <20MW	Solar Thermal	Photo-voltaic/ Solar Thermal	Wind	Total
Imperial			208	1,259					1,467
Kern	44			867	24	250		2,169	3,354
Kings				145					145
Los Angeles		85		337					422
Riverside				175		1,734			1,909
Sacramento					2				2
San Bernardino				20		770	633		1,423
San Diego				45					45
San Luis Obispo				250					250
Shasta								102	102
Solano								155	155
Stanislaus				50	1				51
Tulare				110					110
<b>Total</b>	<b>44</b>	<b>85</b>	<b>208</b>	<b>3,258</b>	<b>27</b>	<b>2,754</b>	<b>633</b>	<b>2,426</b>	<b>9,435</b>

Source: CEC, Lead Commissioner Report – Renewable Power in California: Status and Issues, CEC-150-2011-002-LCF-REV1, December 2011.

As explained above, the PAR 1110.2 would not conflict with adopted energy conservation plans; result in the need for new or substantially altered power or natural gas utility systems; create any significant effects on local or regional energy supplies and on requirements for additional energy; create any significant effects on local or regional energy supplies and on requirements

<sup>9</sup> California Biomass Collective’s biomass facility database , <http://biomass.ucdavis.edu/tools/>, March 14, 2012,

<sup>10</sup> CEC, Lead Commissioner Report – Renewable Power in California: Status and Issues, CEC-150-2011-002-LCF-REV1, December 2011

for additional energy; create any significant effects on peak and base period demands for electricity and other forms of energy; and would comply with existing energy standards.

Based upon these considerations, the proposed project would not substantially alter the significant adverse energy impacts detailed in the 2007 Final EA; significant adverse impacts to energy are not expected from implementation of PAR 1110.2. Since PAR 1110.2 would not generate any new significant energy impacts or make substantially worse any significant adverse impacts, an addendum is appropriate. Since no significant or substantially worse adverse energy impacts were identified, no mitigation measures are necessary or required.

### **Geology and Soils**

PAR 1110.2 includes the same biogas concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates to January 1, 2016 or January 1, 2018 under the alternative compliance option. The analysis of geology and soils impacts would be the same as proposed in the 2008 amendments to Rule 1110.2, which were not deemed significant for adverse geology and soils impacts in the April 20, 2007 NOP/IS for the 2007 Final EA. Any impacts to geology and soils would only occur at a later date.

Flaring biogas in lieu of complying with PAR 1110.2 was not analyzed in the 2007 Final EA. However, any flaring of biogas in lieu of complying with PAR 1110.2 would occur at existing affected facilities using existing biogas-fueled flares. Therefore, no construction would be required. Affected operators that flare biogas in lieu of complying with PAR 1110.2 may remove biogas-fueled ICEs. PAR 1110.2 may result in the early removal of the biogas-fueled engines, but the impacts would be the same as removing them at a later date. The removal of the biogas-fueled engines is not expected to affect geology and soils since the engines are placed on concrete pads.

Existing digester gas facilities have emergency standby generators that can be used to support the plant during emergencies, if the biogas-fueled engines are replaced by flares. Landfill gas facilities typically do not use emergency standby generators. The 2007 Final EA assumed that emergency engines would be installed at digester gas facilities that replaced their ICEs with alternative technologies in lieu of complying with the existing rule. If emergency engines are installed at an affected facility, the impacts would be no greater than those analyzed in the 2007 Final EA. Therefore, no new impacts are expected to geological resources from emergency standby generators. However, if new emergency standby generators are needed they are expected to be dropped in place on existing concrete surfaces within the boundaries of existing biogas facilities.

As explained above, the PAR 1110.2 would not expose people or structures to potential new significant adverse effects, including the risk of loss, injury, or death involving ruptures of a known earthquake fault, strong seismic ground shaking or seismic-related ground failure, including liquefaction; result in new substantial soil erosion or the loss of topsoil; be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in new on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse; be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or have soils incapable of adequately

supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Based upon these considerations, since the proposed project is not expected to adversely affect geology or soils in any way, it would not alter the significant adverse geology and soil impacts conclusion in the 2007 Final EA. Since no significant or substantially worse adverse geology and soils impacts were identified, no mitigation measures are necessary or required.

### **Hazards and Hazardous Materials**

PAR 1110.2 includes the same biogas concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates to January 1, 2016 or January 1, 2018 under the alternative compliance option. The analysis of hazards and hazardous material impacts would be the same as proposed in the 2008 amendments to Rule 1110.2, which were not deemed significant for hazards and hazardous material impacts in the 2007 Final EA. Any hazards or hazardous materials impacts would only occur at a later date.

Additional diesel fuel was expected to be consumed during construction; from trips related to source testing, delivery, or hauling away of spent carbon or catalysts; and by diesel emergency generators depending on whether operators would comply with 2008 amendments to Rule 1110.2 or replace existing biogas-fueled ICEs with an alternative technology. The 2007 Final EA concluded that hazard impacts associated with additional diesel use would not be significant. Flaring in lieu of complying with PAR 1110.2 would eliminate the need for diesel during construction and trips related to source testing, delivery, or hauling away of spent carbon or catalysts. As a result, potential hazards associated with diesel used as a mobile source fuel would be less under PAR 1110.2 than was analyzed in the 2007 Final EA.

Similarly, potential hazard impacts from biogas-fueled ICEs that would have complied with 2008 amendments to Rule 1110.2 using SCR units using either aqueous ammonia or urea to operate would be eliminated under the proposed project. Delivery of ammonia for SCR units would no longer be necessary. The 2007 Final EA concluded that a catastrophic release of ammonia from storage tanks could result in significant adverse exposures to ammonia vapors. If flaring of biogas is chosen in lieu of complying with PAR 1110.2, no ammonia would be used. Therefore, hazard impacts from ammonia handling, storage or transportation would be less under PAR 1110.2 than was analyzed in the 2007 Final EA.

In the 2007 Final EA, SCAQMD staff concluded that a cataclysmic destruction of an LNG storage tank in an LNG facility system would extend 0.2 mile from the LNG storage tank, which was considered to be a significant adverse impact because offsite receptors were determined to be within 0.1 mile of some affected facilities. Similarly, during transport of LNG, it was estimated that the adverse impacts from various releases could extend 0.3 mile, which was also concluded to be a significant adverse hazard impact. If flaring natural gas is chosen in lieu of complying with PAR 1110.2 hazard impacts identified in the 2007 Final EA from storing LNG at affected facilities or from transporting LNG would be eliminated.

Flaring biogas in lieu of complying with PAR 1110.2 was not analyzed in the 2007 Final EA. However, any flaring of biogas used in lieu of complying with PAR 1110.2 would occur at existing affected facilities using in existing biogas-fueled flares. Since biogas would be flared

on-site, there would be no hazards associated with transportation. Combustion of biogas in a flare or ICEs is considered a safety measure that prevents releases of biogas into environment, since it would prevent a build-up of biogas at landfills or sewage treatment facilities. The flares are considered a means of controlling biogas during upsets in the existing ICEs.

Existing digester gas facilities have emergency standby generators that can be used to support the plant during emergencies, if the biogas-fueled engines are replaced by the flaring of biogas. Landfill gas facilities typically do not use emergency standby generators. The 2007 Final EA assumed that affected facility operators would install emergency engines at digester gas facilities that replaced their ICEs with alternative technologies in lieu of complying with the existing rule. If emergency engines are installed at an affected facility, the impacts would be no greater than those analyzed in the 2007 Final EA. Therefore, no new hazards or hazardous material impacts are expected from emergency standby generators. The 2007 Final EA estimated that approximately six gallons of diesel fuel per day or 194 million cubic feet per day of natural gas may be required at a single facility to fuel new emergency standby generators. Because of its low vapor pressure, hazards from the transportation or handling of diesel fuel were concluded to be less than significant. Implementing PAR 1110.2 would not change this conclusion. New natural gas emergency standby generators are expected to be used at facilities that already have natural gas service; therefore, no new hazards are expected from the use of natural gas to fuel new emergency standby generators.

As explained above, PAR 1110.2 is not expected to create a significant new or additional hazard to the public or create a reasonably foreseeable upset condition involving the release of hazardous materials greater than what was reported in the 2007 Final EA.

Government Code §65962.5 refers to hazardous waste handling practices at facilities subject to the Resources Conservation and Recovery Act (RCRA). Though some of the affected facilities subject to 2008 amendments to Rule 1110.2 may be included on the list of the hazardous materials sites compiled pursuant to Government Code §65962.5, compliance with the proposed project is not expected to affect in any way any facility's current hazardous waste handling practices. Hazardous wastes from the existing facilities are required to be managed in accordance with applicable federal, state, and local rules and regulations. As a result, the NOP/IS for the 2007 Final EA concluded that potential hazard impacts at any affected facilities subject to Government Code §65962.5 would be less than significant. Since PAR 1110.2 would not require construction such as the installation of control equipment utilizing catalysts (that could later be processed as hazardous waste), no additional waste is expected to be generated from the proposed project. Further, for those affected facilities which already use catalyst, the collected spent catalyst would continue to be handled in the same manner under PAR 1110.2 as currently handled such that it would be disposed/recycled at approved facilities. Consequently, hazards impacts from the disposal/recycling of hazardous materials as a result of implementing PAR 1110.2 would not change the significance conclusion in the NOP/IS for the 2007 Final EA.

### ***Airports and Airstrips***

The 2007 Final EA concluded that, because of the potential for significant adverse impacts from storing or transport of ammonia or LNG could occur within two miles of an airport or airstrip, it was concluded that impacts to these types of facilities would be significant. However, as explained above, flaring biogas instead of complying with the PAR 1110.2 would be expected to reduce this significant impact somewhat. Therefore, PAR 1110.2 is not expected to result in a

greater safety hazard impacts for people residing or working in an affected facility project area that is within the vicinity of an airport than disclosed in the 2007 Final EA.

***Emergency Response Plans***

The NOP/IS for the 2007 Final EA concluded that impacts to local emergency response plans would not be significant. Emergency response plans are typically prepared in coordination with the local city or county emergency plans to ensure the safety of not only the public (surrounding local communities), but the facility employees as well. The proposed project is not expected to impair implementation of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. Any existing facilities affected by the proposed project would typically already have their own emergency response plans in place. Since existing facilities currently flare biogas, any additional flaring of biogas is expected to fall within procedures found in existing emergency response plans. Thus, PAR 1110.2 is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, so it would not change the conclusion of insignificance for this topic in the NOP/IS for the 2007 Final EA.

***Flammable Materials and Fire Hazards***

The NOP/IS for the 2007 Final EA concluded that wildfire risk impacts from the 2008 amendments to Rule 1110.2 would not be significant since existing biogas-fueled ICEs would not be expected to increase the use of flammable materials in or near areas with flammable brush, grass, or trees because operators of affected facilities would not alter the type or amount of fuel used when replacing or retrofitting engines. In addition, affected facilities are often located in urbanized, industrial areas and no wildlands are expected to be located in the immediate or surrounding areas. Finally, no substantial or native vegetation is expected to exist within the operational portions of any of the affected facilities, since existing ICE systems are operating at these facilities. Flaring biogas in lieu of complying with PAR 1110.2 is not expected to alter the conclusion in the NOP/IS that wildfire risk impacts would be less than significant.

It was concluded in the NOP/IS for the 2007 Final EA that the 2008 amendments to Rule 1110.2 would not create significant adverse flammability impacts because none of the control technologies or monitoring equipment is expected to use flammable materials (aqueous ammonia is not flammable). Further, the 2008 amendments to Rule 1110.2 would not require a change in operation, fuels consumed or stored. Flaring biogas in lieu of complying with PAR 1110.2 would not alter the conclusion in the NOP/IS because no additional fuels or flammable materials are associated with flaring biogas.

Based upon these considerations, the proposed project would not substantially alter the significant adverse hazards and hazardous materials impacts identified in the NOP/IS for the 2008 amendments to Rule 1110.2 or the 2007 Final EA because no new significant or substantially worse hazards and hazardous materials impacts are expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse hazards and hazardous materials impacts were identified, no mitigation measures are necessary or required.

### **Hydrology and Water Quality**

The NOP/IS for the 2007 Final EA concluded that hydrology and water quality from implementing the 2008 amendments to Rule 1110.2 impacts would not be significant. PAR 1110.2 includes the same biogas concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NOx compliance dates to January 1, 2016 or January 1, 2018 under the alternative compliance option. The analysis of hydrology and water quality impacts would be the same as proposed in the 2008 amendments to Rule 1110.2, which were not deemed significant for adverse hydrology and water quality impacts in the 2007 Final EA. Any hydrology or water quality impacts would only occur at a later date.

Flaring biogas in lieu of complying with PAR 1110.2 was not analyzed in the 2007 Final EA. However, any flaring of biogas in lieu of complying with PAR 1110.2 would occur in existing biogas-fueled flares. Any increase in flaring of biogas is not expected to require any new or additional water use or wastewater discharge because flares typically do not involve the use of water. Therefore, PAR 1110.2 would not adversely affect water resources, water quality standards, groundwater supplies, water quality degradation, existing water supplies or wastewater treatment facilities.

Because the affected engines and after treatments in PAR 1110.2 do not utilize water for their operations, no changes to any existing wastewater treatment permits would be necessary. As a result, the proposed project is not expected to affect any affected facility's ability to comply with existing wastewater treatment requirements or conditions from any applicable Regional Water Quality Control Board or local sanitation district because the proposed project has no effect on existing wastewater generation.

The NOP/IS for the 2007 Final EA concluded that any construction activities requiring water for dust suppression for the installation of after treatment or removal of equipment would be minor and, therefore, would not require substantial amounts of water. Any disposal of existing ICEs as a result of flaring in lieu of complying with PAR 1110.2 is not expected to require using any water or generate any wastewater. The disposal of existing ICEs is not expected to require earthmoving, ICEs are on existing concrete pads, so additional watering for fugitive dust control pursuant to Rule 403 would be not necessary for PAR 1110.2. As a result, PAR 1110.2 would not alter the conclusions in the NOP/IS that the 2008 amendments to Rule 1110.2 would not have significant adverse effects on any existing drainage patterns, increase the rate or amount of surface runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

The NOP/IS for the 2007 Final EA concluded that the 2008 amendments to Rule 1110.2 would not be not expected to require any new or additional construction activities to build additional housing that could be located in 100-year flood hazard areas. Similarly, PAR 1110.2 is not expected to result in placing housing in 100-year flood hazard areas that could create new flood hazards. Since there is no new or additional construction associated with PAR 1110.2, the proposed project is not expected to alter the conclusion of insignificance regarding placing housing in a 100-year flood zone in the NOP/IS.

The NOP/IS for the 2007 Final EA concluded that the 2008 amendments to Rule 1110.2 would not create significant adverse risk impacts from seiches, tsunamis, or mudflows. PAR 1110.2



would only delay the installation of after treatment on affected engines or alternative technologies used in lieu of complying with PAR 1110.2. No new facilities are expected to be constructed as a result of the proposed project. Thus, no new flood risks or risks from seiches, tsunamis or mudflow conditions would result from the implementation of PAR 1110.2. Further, any risks from seiches, tsunamis, or mudflows would be part of the existing setting. Consequently, PAR 1110.2 would not alter any conclusions in the NOP/IS regarding risks from seiches, tsunamis, or mudflows.

The NOP/IS for the 2007 Final EA concluded that the 2008 amendments to Rule 1110.2 would not create significant adverse impacts to wastewater or stormwater drainage facilities. Because the engines subject to PAR 1110.2 and emissions control equipment do not utilize water for their operations, no new or increase in wastewater that could exceed the capacity of existing stormwater drainage systems or require the construction of new wastewater or stormwater drainage facilities would be expected as a result of complying with the proposed project. Biogas facilities currently manage stormwater; no change in stormwater management would be expected. Consequently, PAR 1110.2 would not alter any conclusions in the NOP/IS regarding affects to wastewater or stormwater drainage facilities.

Based upon these considerations, the proposed project would not substantially alter the conclusions in the NOP/IS that significant adverse hydrology and water quality impacts, since significant or substantially worse hydrology and water quality impacts are not expected from the implementation of the 2008 amendments to Rule 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse hydrology and water quality impacts were identified, no mitigation measures are necessary or required.

### **Land Use and Planning**

The NOP/IS for the 2007 Final EA concluded that land use and planning impacts would not be significant. PAR 1110.2 includes the same biogas NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. PAR 1110.2 would only delay the installation and use of emissions control after treatment for stationary engines fired by biogas or replacement of ICEs in lieu of complying with PAR 1110.2. All construction and operations activities are expected to occur on-site at biogas facilities. Therefore, the proposed project is not expected alter any conclusions in the NOP/IS that the 2008 amendments to Rule 1110.2 would not create divisions in any existing communities.

The NOP/IS for the 2007 Final EA concluded that the 2008 amendments to Rule 1110.2 would not create significant adverse land use and planning impacts. There are no provisions in PAR 1110.2 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments, and since PAR 1110.2 would only affect biogas-fueled engines, no land use or planning requirements would be altered by the proposed project. Further, PAR 1110.2 would be consistent with the typical industrial, commercial, and institutional zoning of the affected facilities. Operations of affected engines at biogas facilities would still be expected to comply, and not interfere, with any applicable land use plans, zoning ordinances, habitat conservation or natural community conservation plans.

Based upon these considerations, the proposed project would not substantially alter the significant adverse land use and planning impacts detailed in the 2007 Final EA, since significant or substantially worse land use and planning impacts are not expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse land use and planning impacts were identified, no mitigation measures are necessary or required.

### **Mineral Resources**

The NOP/IS for the 2007 Final EA concluded that material resource impacts would not be significant. PAR 1110.2 includes the same biogas NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. PAR 1110.2 would only delay the installation and use of emissions control after treatment for stationary engines fired by biogas or replacement of ICEs in lieu of complying with PAR 1110.2. All construction and operations activities are expected to occur on-site at biogas facilities. Therefore, the proposed project is not expected alter any conclusions in the NOP/IS that the 2008 amendments to Rule 1110.2 would not result in the loss of availability of a known mineral resource of value to the region and the residents of the state such as aggregate, coal, clay, shale, et cetera, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based upon these considerations, the proposed project would not substantially alter the significant adverse mineral resource impacts detailed in the 2007 Final EA, since significant or substantially worse mineral resources impacts are not expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse mineral resources impacts were identified, no mitigation measures are necessary or required.

### **Noise**

The NOP/IS for the 2007 Final EA concluded that noise impacts would not be significant. PAR 1110.2 includes the same biogas NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. PAR 1110.2 would only delay the installation and use of emissions control after treatment for stationary engines fired by biogas or replacement of ICEs in lieu of complying with PAR 1110.2. All construction and operations activities are expected to occur on-site at biogas facilities, which are typically located in remote areas that are not adjacent to residences. Therefore, the proposed project is not expected alter any conclusions in the NOP/IS that the 2008 amendments to Rule 1110.2 would not create new noise or vibration impacts.

Operation of affected biogas-fueled engines typically results in the generation of a certain amount of noise and vibration. However, it is expected that affected engines fired by biogas are already in compliance with all existing noise control laws or ordinances. Further, Occupational Safety and Health Administration (OSHA) and California-OSHA (Cal/OSHA) have established noise standards to protect worker health. The NOP/IS concluded that PAR 1110.2 compliant ICEs and any technology used in lieu of complying with PAR 1110.2 were not expected not generate additional or new noise, excessive groundborne vibration, or substantially increase

ambient noise levels beyond existing levels. PAR 1110.2 would implement the concentration limits for biogas-fueled engines at a later date. Therefore, any noise from after treatment or technology used in lieu of complying with PAR 1110.2 required by the existing Rule 1110.2, which was not deemed to be significant in the 2007 Final EA, would only occur at a later date.

Flaring biogas in lieu of complying with PAR 1110.2 was not analyzed in the 2007 Final EA. However, flaring of biogas currently occurs at affected facilities; therefore, additional flaring of biogas, would not add any new noise, excessive groundborne vibration, or substantially increase ambient noise levels beyond existing levels.

Although not likely, some of the facilities affected by PAR 1110.2 may be located at sites within an airport land use plan, or within two miles of a public airport, implementation of the proposed project would not expose people residing or working in the project area to the same degree of excessive noise levels associated with airplanes. All noise producing equipment must comply with local noise ordinances and applicable OSHA or Cal/OSHA workplace noise reduction requirements.

Based upon these considerations, the proposed project would not substantially alter the significant adverse noise impacts detailed in the 2007 Final EA, since significant or substantially worse noise impacts are not expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse noise impacts were identified, no mitigation measures are necessary or required.

### **Population and Housing**

The NOP/IS for the 2007 Final EA concluded that impacts to population and housing would not be significant. PAR 1110.2 includes the same biogas NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. PAR 1110.2 would only delay the installation and use of emissions control after treatment for stationary engines fired by biogas or replacement of ICEs in lieu of complying with PAR 1110.2. All construction and operations activities are expected to occur on-site at biogas facilities. Therefore, the proposed project is not expected alter any conclusions in the NOP/IS that the 2008 amendments to Rule 1110.2 would not create new impacts to population or housing.

Human population within the SCAQMD's jurisdiction is anticipated to grow regardless of implementing PAR 1110.2. No component of PAR 1110.2 would require additional construction employees than was analyzed in the April 20, 2007 NOP/IS for the 2007 Final EA. Similarly, additional employees would not be required during operation because the proposed project would only delay the operation of after treatment or technology used in lieu of complying with PAR 1110.2.

District population is not expected to be affected directly or indirectly as a result of adopting and implementing PAR 1110.2. Further, PAR 1110.2 would not indirectly induce growth in the area of facilities with affected engines. The construction of single- or multiple-family housing units would not be required as a result of implementing the proposed project since no new employees would be required at affected facilities. The proposed project is not expected to require relocation of affected engines or facilities, so existing housing or populations in the district are

not anticipated to be displaced necessitating the construction of replacement housing elsewhere. As a result, the proposed project is not anticipated to generate any significant adverse effects, either direct or indirect, on population growth in the district or population distribution.

Based upon these considerations, the proposed project would not substantially alter the significant adverse population and housing impacts detailed in the 2007 Final EA, since significant or substantially worse population and housing impacts are not expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse population and housing impacts were identified, no mitigation measures are necessary or required.

### **Public Services**

The NOP/IS for the 2007 Final EA concluded that impacts to public services would not be significant. As noted in the “Hazards and Hazardous Materials” discussion, PAR 1110.2 would not involve the use of any new acutely hazardous materials. As a result, no new fire hazards or increased use of hazardous materials would be introduced at existing affected facilities that would require emergency responders such as police or fire departments. Thus, no new demands for fire or police protection are expected from PAR 1110.2 since the proposed rule amendments would only delay the installation of emission control devices or technology used in lieu of complying with PAR 1110.2 and associated equipment.

As noted in the “Population and Housing” discussion, implementation of the proposed project would not require new employees for construction because no new or additional construction activities would be necessary to comply with PAR 1110.2 for affected engines beyond what was previously analyzed in the 2007 Final EA. Only the installation and operation of after treatment or replacement technology used in lieu of complying with PAR 1110.2 would take place at a later date. Similarly, no new employees would be required to maintain operation of the affected engines or alternative technologies other than what was evaluated previously in the 2007 Final EA. As a result, PAR 1110.2 would have no direct or indirect effects on population growth in the district. Therefore, there would be no increase in local population and thus no impacts are expected to local schools or parks.

Because the proposed project would only resulting in construction and operational activities occurring at a later date that may require new or altered permits, implementation of PAR 1110.2 would not trigger a need for additional government services than what was analyzed in the 2007 Final EA. Further, the proposed project would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. There would be no increase in population and, therefore, no need for physically altered government facilities.

Based upon these considerations, the proposed project would not substantially alter the significant adverse public service impacts detailed in the April 20, 2007 NOP/IS for the 2007 Final EA, since significant or substantially worse public services impacts are not expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse public services impacts were identified, no mitigation measures are necessary or required.

### **Recreation**

The NOP/IS for the 2007 Final EA concluded that recreation impacts would not be significant. As previously discussed under “Land Use,” there are no provisions in PAR 1110.2 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments; no land use or planning requirements would be altered by the proposed project. Further, implementation of PAR 1110.2 would not increase the use of existing neighborhood and regional parks or other recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment because the proposed project is not expected to induce population growth.

Based upon these considerations, the proposed project would not substantially alter the significant adverse recreation impacts detailed in the 2007 Final EA, since significant or substantially worse recreation impacts are not expected from the implementation of PAR 1110.2 and, therefore, an addendum is appropriate. Since no significant or substantially worse recreation impacts were identified, no mitigation measures are necessary or required.

### **Solid and Hazardous Wastes**

The NOP/IS for the 2007 Final EA concluded that solid and hazardous waste impacts would not be significant. PAR 1110.2 includes the same biogas NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. PAR 1110.2 would only delay the installation and use of emissions control after treatment for stationary engines fired by biogas or replacement of ICEs in lieu of complying with PAR 1110.2. All construction and operations activities are expected to occur on-site at biogas facilities. Therefore, the proposed project is not expected alter any conclusions in the NOP/IS for the Final EA that would create new solid or hazardous waste impacts.

Flaring biogas in lieu of complying with PAR 1110.2 was not analyzed in the 2007 Final EA. However, any flaring of biogas in lieu of complying with PAR 1110.2 would occur in existing biogas-fueled flares. Additional flare of biogas is not expected to generate any additional solid/hazardous waste. Flaring biogas in lieu of complying with PAR 1110.2 may result in the disposal of ICEs. However, the early disposal of ICEs was determined not to be significant in the 2007 Final EA. Therefore, no significant solid/hazardous waste impacts are expected, if operators choose to flaring biogas in lieu of complying with PAR 1110.2.

Based on the April 20, 2007 NOP/IS for the 2007 Final EA, implementing PAR 1110.2 not expected to hinder in any way any affected facility’s ability to comply with existing federal, state, and local regulations related to solid and hazardous wastes. Consequently, it is anticipated that operators of affected facilities would continue to comply with federal, state, and local statutes and regulations related to solid and hazardous waste handling and disposal.

Based on these considerations, PAR 1110.2 is not expected to increase the volume of solid or hazardous wastes that cannot be handled by existing municipal or hazardous waste disposal facilities, or require additional waste disposal capacity other than already analyzed in the Final EA, which was determined to be less than significant for solid/hazardous waste. Further, implementing PAR 1110.2 is not expected to interfere with any affected facility’s ability to

comply with applicable local, state, or federal waste disposal regulations. Since no new significant or substantially worse solid/hazardous waste impacts were identified, no mitigation measures are necessary or required and an addendum is appropriate.

### **Traffic/Transportation**

The NOP/IS for the 2007 Final EA concluded that traffic/transportation impacts would not be significant. PAR 1110.2 includes the same biogas NO<sub>x</sub> concentration limits for biogas-fueled ICEs that would have become effective July 1, 2012, if the technology review had been completed in 2010. The current proposal would extend the effective final NO<sub>x</sub> compliance dates that extend out to January 1, 2016 or January 1, 2018 under the alternative compliance option. PAR 1110.2 would only delay the installation and use of emissions control after treatment for stationary engines fired by biogas or replacement of ICEs in lieu of complying with PAR 1110.2. All construction and operations activities are expected to occur on-site at biogas facilities. Therefore, the proposed project is not expected alter any conclusions in the April 20, 2007 NOP/IS for the 2007 Final EA that the 2008 amendments to Rule 1110.2 would not create new traffic/transportation impacts.

As noted in the “Discussion” sections of other environmental topics, compliance with PAR 1110.2 is not expected to require construction activities or the installation of control equipment other than what was already evaluated in the NOP/IS. The NOP/IS estimated that 50 delivery and 75 worker trips per day would be required during construction, 76 ammonia trips would be required per quarter and 11 trips every three years would be required to replace catalyst. These values were updated in the 2007 Final EA in the section titled “Potential Environmental Impacts Found Not to Be Significant,” based on the environmental analysis of construction air quality impacts. The construction air quality analysis in the 2007 Final EA concluded that a maximum of 62 new truck trips during construction would occur. Because the maximum number of truck trips during construction was less than the number of truck trips identified in the April 20, 2007 NOP/IS for the in the 2007 Final EA, the conclusion that transportation/traffic impacts would not to be significant is unchanged. The siting of each affected facility is expected to be consistent with surrounding land uses and traffic/circulation in the surrounding areas of the affected facilities. Similarly, the maximum number of truck trips during operation was updated as part of the air quality analysis. Alternative technologies in lieu of complying with PAR 1110.2 were estimated to need a maximum of 114 truck trips per day. Although this number is higher than what was discussed in the April 20, 2007 NOP/IS for the 2007 Final EA, it would not exceed any of the SCAQMD’s transportation/traffic significance thresholds and, therefore, was concluded to be less than significant for transportation/traffic. Operation of PAR 1110.2 and existing Rule 1110.2 engines are expected to utilize similar number of employees, so no increase in employee trips are expected.

Flaring biogas in lieu of complying with PAR 1110.2 was not analyzed in the 2007 Final EA. However, any flaring of biogas in lieu of complying with PAR 1110.2 would occur at existing affected facilities using existing biogas-fueled flares. Therefore, no construction would be required. Affected operators that flare biogas in lieu of complying with PAR 1110.2 may remove biogas-fueled ICEs. PAR 1110.2 may result in the early removal of the biogas-fueled engines, but the impacts would be the same as removing them at a later date, which was evaluated in the April 27 NOP/IS 2007 Final EA and refined in the 2007 Final EA based on the air quality analysis.

Existing digester gas facilities have emergency standby generators that can be used to support the plant during emergencies, if the biogas-fueled engines are replaced by flares. Landfill gas facilities typically do not use emergency standby generators. The 2007 Final EA assumed that emergency engines would be installed at digester gas facilities that replaced their ICEs with alternative technologies in lieu of complying with the existing rule. If emergency engines are installed at an affected facility, the impacts would be no greater than those analyzed in the NOP/IS and 2007 Final EA. Therefore, no new impacts are expected to traffic/transportation from emergency standby generators. However, if new emergency standby generators are needed they are expected to be dropped in place on existing concrete surfaces within the boundaries of existing biogas facilities.

Since there would be no greater construction or change in operations that would affect traffic/transportation other than what was already evaluated in the NOP/IS and 2007 Final EA and determined to be less than significant for transportation/traffic, there would be no change to traffic/circulation. Therefore, PAR 1110.2 is not expected to conflict with an applicable plan, policy establishing measures of effectiveness for the performance of the circulatory system, applicable congestion management program, or conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities.

Though some of the facilities that would be affected by PAR 1110.2 may be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, any actions that would be taken to comply with the proposed project are not expected to influence or affect air traffic patterns or navigable air space based on the NOP/IS. Thus, PAR 1110.2 would not result in a change in air traffic patterns including an increase in traffic levels or a change in location that results in substantial safety risks.

The proposed project would not substantially change the way the affected engines would operate in relationship to transportation/traffic. Based on the analysis in the April 20 NOP/IS for the 2007 Final EA, the proposed project does not involve construction of any roadways or other transportation design features, so there would be no change to current roadway designs that could increase traffic hazards. Thus, the proposed project is not expected to substantially increase traffic hazards or create incompatible uses at or adjacent to the affected facilities.

Based on the analysis in the April NOP/IS for the 2007 Final EA, emergency access at each affected facility is not expected to be impacted by the proposed project. Further, each affected facility is expected to continue to maintain their existing emergency access gates. Since PAR 1110.2 does not involve any new construction activities not evaluated in the April NOP/IS for the 2007 Final EA and is not expected to alter operation of affected engines, the proposed project is not expected to increase hazards due to design features or alter emergency access.

Based upon these considerations, the proposed project would not substantially alter the significant adverse transportation/traffic impacts detailed in the April 20, 2007 NOP/IS for the 2007 Final EA or the 2007 Final EA, since significant or substantially worse transportation/traffic impacts are not expected from the implementation of PAR 1110.2; therefore, an addendum is appropriate. Since no significant or substantially worse transportation/traffic impacts were identified, no mitigation measures are necessary or required.

## **CONCLUSION**

Analysis of the proposed project indicated that an Addendum the 2007 Final EA prepared pursuant to CEQA Guidelines §15164 is the appropriate CEQA document to analyze the potential adverse environmental impacts associated with PAR 1110.2 because SCAQMD staff has concluded that the proposed amendments result in some changes or additions to the 2007 Final EA; but that based on the analysis in this addendum, no new significant environmental effects or a substantial increase in the severity of previously identified significant effects were identified, thus none of the conditions described in CEQA Guidelines §15162 calling for preparation of a subsequent EIR have occurred:

1. No substantial changes are proposed in the project which required major revision of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
2. No substantial changes would occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR;
  - B. Significant effects previously examined with be substantially more severe than shown in the previous EIR;
  - C. Mitigation measures or alternatives previously found not to be feasible would be in fact feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the migration measure or alternative; or
  - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the migration measure or alternative.

Based on the analysis in this addendum, PAR 1110.2 would not generate new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Since PAR 1110.2 would not generate new significant environmental effects or a substantial increase in the severity of previously identified significant effects, no new mitigation measures or alternatives have been proposed. No changes to existing mitigation measures or alternatives are proposed. This conclusion is supported by substantial evidence provided as part of the environmental analysis in this Addendum as well as other documents in the record.



**APPENDIX A**

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**PROPOSED AMENDED RULE 1110.2**

In order to save space and avoid repetition, please refer to the latest version of the PAR 1110.2 located elsewhere in the final rule package.

## **APPENDIX B**

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### **ASSUMPTIONS AND CALCULATIONS**

## **Criteria Pollutant Emissions from Flares**

Inputs/assumptions from the 2007 Final EA:

Total biogas use for the engines based on the 2008 survey is  $4.45 \times 10^{12}$  Btu or  $4.45 \times 10^6$  mmBtu.

Emission factors based on flare permit limits -

The average flare emission factor for NO<sub>x</sub> is 0.056 lb/mmBtu.

Emissions are:

249,200.00 lb/yr

682.74 lb/day

The average flare emission factor for VOC is 0.035 lb/mmBtu.

Emissions are:

155,750.00 lb/yr

426.71 lb/day

The average flare emission factor for CO is 0.115 lb/mmBtu.

Emissions are:

511,750.00 lb/yr

1,402.05 lb/day

## ATTACHMENT J

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

### Final Environmental Assessment:

### Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs)

December 2007

SCAQMD No. 280307JK

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## PREFACE

The Draft Environmental Assessment (EA) for the Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs) was circulated for a 45-day public review and comment period from November 2, 2007 to December 18, 2007. One public comment letter was received and minor modifications were made to the Draft EA so it is now a Final EA. Deletions and additions to the text of the Draft EA are denoted using ~~striketrough~~ and underlined, respectively. The primary changes to the proposed project since the release of the Draft EA are:

- The calculation of the monthly facility biogas use percentage may exclude natural gas fired during: any electrical outage at the facility; Stage 2 or higher electrical emergencies called by the California Independent System Operator Corporation; and when precipitation causes a sewage treatment plant to exceed its design capacity.
- The Executive Officer may approve the burning of more than ten percent natural gas in a land fill or digester gas-fired engine, when it is necessary, if the engine required more natural gas in order for waste heat recovery boiler to provide enough thermal energy to operate a sewage treatment plant, and other boilers at the facility are unable to provide the necessary thermal energy.
- The emission standards for CO and VOC for new electrical generation engines would be increased from 0.10 lb/MW-hr to 0.20 lb/MW-hr and 0.02 lb/MW-hr to 0.10 lb/MW-hr.
- An exception from the quarterly CO monitoring was added for diesel and other lean-burn engines that are subject or Regulation XX or have a NO<sub>x</sub> CEMs and that are not subject to a CO limit more stringent than 2000 ppm. The engines would still be subject to the I&M plans.

These changes were made in response to comments on PAR 1110.2. The first change was made to allow the operations of natural gas engine during emergencies. This would reduce allow the use of more natural gas combustion instead of diesel emergency engines during emergencies. As shown in the air quality analysis natural gas combustion generates less criteria and toxic air pollutants. Since emergency operations are not expected, they are considered speculative and therefore were not analyzed in the Final EA.

The second change would allow the use of more than ten percent natural gas used at sewage treatment plants where heat from ICEs is used for digesters, and when rainfall causes a sewage treatment plant to exceed its design capacity. During rainy weather, air quality is at its best and the impact of the higher emissions should be minimal. During the winter, the facility that uses heat from the ICEs for digesters may need additional natural gas to sustain digester operations. This exception was added since digester operations at sewage facilities are considered an essential operation. Affected sewage treatment plant operators are expected to add a condition to their permits to operate that specify the temperature at which this exception would apply. Emissions were estimated and evaluated in this Final EA. The additional emissions would not be significant neither would they be considered a substantial increase in the severity of an adverse environmental impact that would require recirculation.

The final change was made because manufacturers have stated that it is not technically possible for new electrical generation engines that require permits to meet the CARB 2007 Distributed Generation Emission Standards, which require emission equipment to large central power plants. However, the Engine Manufacturers Association commented that by increasing the proposed limits, in lbs/MW-hr, from 0.10 to 0.20 for CO and from 0.02 to 0.10 for VOC, some advanced engines may be able to comply. The choice of installing a new engine that complies with the CARB 2007 Distributed Generation Emission Standards and one that complies with the existing PAR 1110.2 with BACT is not expected to affect any environmental topic except for air quality. The revised CO and VOC limits, modified since the circulation of the Draft EA, would still achieve the same NO<sub>x</sub> reductions as the original proposal, and for an electrical generator without heat recovery, the revised limits will still achieve an 89 percent reduction of CO and a 77 percent reduction of VOC, compared to the current BACT limits for typical new engines. Therefore, altering the CO and VOC limits for new distributed generators is not expected to significantly adversely impact or substantially make any environmental topic found to be significantly adversely impacted in the Draft EA more severe.

These changes are expected to have similar affects on Alternatives B, C and D. Since Alterative A is the No Project Alternative, these changes would not affect it.

Pursuant to CEQA Guidelines §15088.5, recirculation is not necessary since the information provided does not result in new avoidable significant effects.



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## **CHAPTER 1**

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### **EXECUTIVE SUMMARY**

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## INTRODUCTION

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977<sup>1</sup> as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin referred to herein as the district. By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the district<sup>2</sup>. Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP<sup>3</sup>. The 2007 AQMP concluded that major reductions in emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NOx) are necessary to attain the air quality standards for ozone and particulate matter (PM10 and PM2.5).

Rule 1110.2 was originally adopted in August 1990 to control NOx, carbon monoxide (CO), and VOC emissions from gaseous and liquid-fueled internal combustion engines (ICEs). For all stationary and portable engines over 50 brake horsepower (bhp), it required that either 1) NOx emissions be reduced over 90 percent, or; 2) the engines be permanently removed from service and/or replaced with electric motors. The rule was amended in September 1990 to make minor clarifications to the rule language. Rule 1110.2 was then amended again in August and December of 1994 to modify the CO monitoring requirements and to clarify rule language. The amendment of November 1997 eliminated the requirement for continuous monitoring of CO, reduced the source testing requirement from once every year to once every three years, and exempted nonroad engines, including portable engines, from most requirements. The last amendment in June 2005 made the previously exempt agricultural engines subject to the rule language.

The objective of proposed amended Rule (PAR) 1110.2 at this time is to further reduce NOx, VOC and CO emissions from gaseous and liquid-fueled ICEs. PAR 1110.2 would partially implement the 2007 AQMP Control Measure MCS-01 – Facility Modernization, which requires facilities to retrofit or replace their equipment to achieve emission levels equivalent to best available control technology (BACT). The proposed amendments would affect stationary, non-emergency engines and would increase monitoring requirements; reduce the emission standards equivalent to the current BACT; require new electrical generating engines to meet the same requirements as large central power plants; and clarify portable engine requirements. The proposed project would also remove obsolete portable engine requirements from the existing rule.

A Notice of Preparation and Initial Study (NOP/IS) (Appendix D), were prepared pursuant to the California Environmental Quality Act (CEQA). The NOP/IS identified environmental topics to be further analyzed in this document. The NOP/IS identified air quality, hazards and hazardous materials, and solid/hazard wastes as environmental topic areas that may be adversely affected by the proposed project. The NOP/IS was distributed to responsible agencies and interested parties for a 30-day review and comment period from April 26,

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<sup>1</sup> The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health & Safety Code, §§40400-40540).

<sup>2</sup> Health & Safety Code, §40460 (a).

<sup>3</sup> Health & Safety Code, §40440 (a).

2007, to May 25, 2007. During that public comment period SCAQMD received two comment letters on the NOP/IS. Comments were received suggesting that the proposed project could also create significant adverse aesthetics and energy impacts. These environmental topic areas, therefore, are also analyzed in this EA. The comment letters and responses to comments are included in Appendix E.

This ~~Draft~~Final Environmental Assessment (EA), prepared pursuant to CEQA Guidelines §15252 and is a substitute document for an environmental impact report. This ~~Draft~~Final EA includes a comprehensive analysis of potential aesthetics, air quality, energy, hazards/hazardous materials, and solid/hazardous waste impacts as a result of implementing the proposed project. Although the NOP/IS only identified as potentially significant adverse air quality, hazards/hazardous materials, and solid/hazardous waste impacts for further analysis in the Draft EA, comments were received on the NOP/IS asserting that the proposed project could also generate potentially significant adverse aesthetics and energy impacts.

Subsequent to the release of the Draft EA changes were made to PAR 1110.2 in response to comments on the proposed amendments. The primary changes to the proposed project since the release of the Draft EA are:

- The calculation of the monthly facility biogas use percentage may exclude natural gas fired during: any electrical outage at the facility; Stage 2 or higher electrical emergencies called by the California Independent System Operator Corporation; and when precipitation causes a sewage treatment plant to exceed its design capacity.
- The Executive Officer may approve the burning of more than ten percent natural gas in a land fill or digester gas-fired engine, when it is necessary, if the engine required more natural gas in order for waste heat recovery boiler to provide enough thermal energy to operate a sewage treatment plant, and other boilers at the facility are unable to provide the necessary thermal energy.
- The emission standards for CO and VOC for new electrical generation engines would be increased from 0.10 lb/MW-hr to 0.20 lb/MW-hr and 0.02 lb/MW-hr to 0.10 lb/MW-hr.
- An exception from the quarterly CO monitoring was added for diesel and other lean-burn engines that are subject or Regulation XX or have a NO<sub>x</sub> CEMs and that are not subject to a CO limit more stringent than 2000 ppm. The engines would still be subject to the I&M plans

Any comments received during the public comment period on the analysis presented in this Draft EA will be responded to and included in the Final EA prior to making a decision on the proposed amended rule, the SCAQMD Governing Board must review and certify the EA as providing adequate information on the potential adverse environmental impacts of the proposed amended rule. One comment letter was received from the public during the 45-day public comment period from November 2, 2007 to December 18, 2007. The comment letter and responses to comments are included in Appendix F of this Final EA.

Throughout this document, references to the proposed project or PAR 1110.2 are used interchangeably.

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

PAR 1110.2 is a “project” as defined by the California Environmental Quality Act (CEQA). CEQA requires that the potential adverse environmental impacts of proposed projects be evaluated and that methods to reduce or avoid identified significant adverse environmental impacts of these projects be implemented if feasible. The purpose of the CEQA process is to inform the SCAQMD's Governing Board, public agencies, and interested parties of potential adverse environmental impacts that could result from implementing the proposed project and to identify feasible mitigation measures when an impact is significant.

California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written documents in lieu of an environmental impact report once the Secretary of the Resources Agency has certified the regulatory program. The SCAQMD's regulatory program was certified by the Secretary of Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110. Pursuant to Rule 110 (the rule which implements the SCAQMD's certified regulatory program), SCAQMD has prepared this ~~Draft~~Final EA to evaluate potential adverse impacts from PAR 1110.2.

## CEQA DOCUMENTATION FOR PROPOSED AMENDED RULE 1110.2

This ~~draft~~Final EA is a comprehensive environmental document that analyzes the environmental impacts from the currently proposed amendments to Rule 1110.2. SCAQMD rules, as ongoing regulatory programs, have the potential to be revised over time due to a variety of factors (e.g., regulatory decisions by other agencies, new data, lack of progress in advancing the effectiveness of control technologies to comply with requirements in technology forcing rules, etc.). The other documents which comprise the CEQA record for the currently proposed amendments to Rule 1110.2, include the NOP/IS of an EA for PAR 1110.2 (April 2007).

**Notice of Preparation/Initial Study (NOP/IS) of an Environmental Assessment (EA) for the Proposed Amendments to Rule 1110.2, April 2007:** The NOP/IS of an EA for the proposed amendments to Rule 1110.2 was released for a 30-day public review period from April 26, 2007, to May 25, 2007. The NOP/IS was released with an Initial Study, which contained a brief project description and the environmental checklist, as required by CEQA Guidelines. The environmental checklist contained a preliminary analysis of potential adverse environmental effects that may result from implementing the proposed amendments. The NOP/IS identified air quality, energy, hazards and hazardous materials, and solid/hazardous waste as the environmental topics that may be adversely affected by the proposed project. This NOP/IS is included in Appendix B of this ~~Draft~~Final EA.

## PAST CEQA DOCUMENTATION FOR RULE 1110.2

Rule 1110.2, like other SCAQMD rules and regulations, comprises a regulatory program that changes over time due to advances in technology, regulatory requirements adopted by state and federal agencies, advances in technology not occurring as anticipated, etc. To reflect these changes, Rule 1110.2 has been amended a number of times since its original adoption in 1990. The following subsections describe the type of CEQA documents prepared for past amendments to Rule 1110.2 and summarize the modifications and analyses

prepared for those documents. The current EA focuses on the currently proposed amendments to Rule 1110.2 and does not rely on the previously prepared CEQA documents described in the following subsections. The following documents can still be obtained by contacting the SCAQMD's Public Information Center at (909) 396-2309.

**Final Environmental Assessment (EA) for Proposed Amended Rule 1110.2, June 2005 (SCAQMD No. 050318MK):** A Draft EA for the proposed Rule 1110.2 was released for a 30-day public review period from March 18, 2005, to April 19, 2005. Proposed amendments to Rule 1101.2 included: removing exemption for all agricultural engines except emergency standby engines and engines powering orchard wind machines; adding more recordkeeping requirements; prohibiting use of portable engine generators to supply power to the grid or to a building, facility, stationary source or stationary equipment except in an emergency affecting grid stability; and removing outdated rule language. Rule 1110.1 was rescinded because it is superseded by the requirements of Rule 1110.2. After circulation of the Draft EA, a Final EA was prepared and certified by the SCAQMD Governing Board on June 3, 2005.

**Final Subsequent Environmental Assessment for the Proposed Amended Rule 1110.2, November 14, 1997 (SCAQMD No. 970909DWS):** Proposed amendments were made to address portable engine requirements under Rule 1110.2 and CARB's Statewide Portable Engine and Equipment Registration Regulation. Significant adverse impacts were identified and evaluated for air quality and energy. The Draft SEA was released for a 45-day public review and comment period from September 10, 1997 to October 28, 1997. No comments were received from the public.

**Notice of Exemption (NOE) for the Proposed Amended Rule 1110.2, December 9, 1994:** The proposed amendments clarified the meaning of the terms "originally installed" for purposes of determining compliance with the rule. A NOE was prepared for proposed amended Rule 1110.2, because the proposed amendments were administrative in nature and had no significant adverse impacts on the environment.

**Notice of Exemption (NOE) for the Proposed Amended Rule 1110.2, August 12, 1994:** The proposed amendments clarified the original intent that continuous in-stack CO monitoring system is not required if a continuous in-stack NOx monitoring system is not required. The proposed amendments harmonized Rule 1110.2 and RECLAIM.

**Final Environmental Assessment (EA) for Proposed Rule 1110.2, September 7, 1990:** The Governing Board requested that staff examine issues during the adoption hearing for Rule 1110.2 and provide recommendations. Clarification of monitoring and periodic emission testing for engines over 1,000 bhp was added for NOx and CO emissions. A limited exemption was proposed for up-slope units at winter resort facilities that are operated less than 700 hours per year. Since the circumstances of the original project and the modifications were essentially the same, the Final EA for Proposed Rule 1110.2 was recertified for these changes.

**Final Environmental Assessment (EA) for Proposed Rule 1110.2, August 3, 1990 (SCAQMD No. 900622ES):** A Draft EA for the proposed rule was released for a 45-day public review period from May 25, 1990, to July 25, 1990. Four comment letters were received and responses were prepared. The EIR identified potential impacts and mitigation measures for water quality, risk of upset, transportation, energy, solid waste disposal, and human health. Significant adverse impacts were mitigated to less than significant. A mitigation monitoring plan was prepared.

## **INTENDED USES OF THIS DOCUMENT**

In general, a CEQA document is an informational document that informs a public agency's decision-makers and the public generally of potentially significant adverse environmental effects of a project, identifies possible ways to avoid or minimize the significant effects, and describes reasonable alternatives to the project (CEQA Guidelines §15121). A public agency's decision-makers must consider the information in a CEQA document before making a decision on the project. Accordingly, this ~~Draft~~Final EA is intended to: (a) provide the SCAQMD Governing Board and the public with information on the environmental effects of the proposed project; and, (b) be used as a tool by the SCAQMD Governing Board to facilitate decision making on the proposed project.

Additionally, CEQA Guidelines §15124(d)(1) requires a public agency to identify the following specific types of intended uses of a CEQA document:

1. A list of the agencies that are expected to use the EA in their decision-making;
2. A list of permits and other approvals required to implement the project; and
3. A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.

To the extent that local public agencies, such as cities, county planning commissions, et cetera, are responsible for making land use and planning decisions related to projects that must comply with the requirements in PAR 1110.2, they could possibly rely on this EA during their decision-making process. Similarly, other single purpose public agencies approving projects at facilities complying with PAR 1110.2 may rely on this EA.

## **AREAS OF CONTROVERSY**

During the public comment period for the NOP/IS and at public meetings held for PAR 1110.2, commentators expressed concerns about several issues. The expense of installing monitoring and emissions control equipment would cause facility operators to replace existing ICEs with alternative technology. Depending on the alternative technology used, it was asserted that PAR 1110.2 could lead to: increased emissions from certain compliance options; eliminating renewable energy sources if operators replace landfill or digester (biogas) ICEs with flares; replacing pumps with electric motors and emergency diesel generators, thus, creating adverse impacts to public services. Commenters stated that limited supplies of diesel fuel could lead to adverse public service impacts if emergencies last for an extended period of time, such as a loss of water when responding to major fire emergencies.

In response to public comments, SCAQMD staff added low-use exceptions from monitoring and future BACT limits, increased the combined horsepower threshold for CEMS to 1,500 horsepower and added several other exceptions which will significantly reduce the number of required CEMS. SCAQMD staff has also committed to conduct a technology assessment in 2010 to evaluate whether or not cost-effective control technologies are available to allow compliance by biogas engines with the final emission compliance limits in the proposed amended rule, avoid the need for biogas flaring, and eliminate or minimize potential adverse impacts identified by the regulated industry. If the assessment shows a potential for replacing ICEs with continuous flaring or that cost-effective control technology is not available for biogas engines, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. Based on these adjustments, SCAQMD staff believes that many of the controversial aspects of PAR 1110.2 for biogas and non-biogas facilities can be addressed.

SCAQMD staff asserts that if water agencies choose to replace ICEs with electric motors as a compliance option, it would be more efficient and less costly to use existing natural gas engines as emergency backup equipment than buying new diesel ICEs. Therefore, SCAQMD staff believes that using existing natural gas engines as emergency generators for electric motors would prevent widespread shortages of diesel fuel for emergency backup generators in the event of an extended emergency.

Comments were also received that the NOP/IS only addressed SCR as compliance option for emission control for biogas engines. In response to these comments this EA also evaluates potential adverse secondary environmental impacts from SCR, NO<sub>x</sub>Tech, CL.Air®, boilers, gas turbines, microturbines, fuel cells, and biogas-to-LNG facilities as potential compliance options.

Commenters were concerned that if multiple engines used biogas that not all engines would be able to run with 10 percent or less natural gas resulting in more flaring of biogas. SCAQMD staff has added an exception that would allow the use of more than 10 percent natural gas if it reduces flaring.

Commenters have expressed concerns about the distributed power emission standards. PAR 1110.2 would implement Senate Bill (SB) 1298 distributed generation emission standards for new electrical generating engines, which was adopted by the California state legislature in 2000. SB 1298 also established a goal to have local districts require permitted distributed generation (DG) equipment to meet BACT levels by the earliest practicable date. These standards have been in effect since January 1, 2007 for DG equipment that does not require a SCAQMD permit.

## **EXECUTIVE SUMMARY**

CEQA Guidelines §15123 requires a CEQA document to include a brief summary of the proposed actions and their consequences. In addition, areas of controversy including issues raised by the public must also be included in the executive summary. This ~~Draft~~Final EA consists of the following chapters: Chapter 1 – Executive Summary; Chapter 2 – Project Description; Chapter 3 – Existing Setting, Chapter 4 – Potential Environmental Impacts and

Mitigation Measures; Chapter 5 – Project Alternatives; Chapter 6 - Other CEQA Topics and various appendices. The following subsections briefly summarize the contents of each chapter.

### **Summary of Chapter 1 – Executive Summary**

Chapter 1 includes a discussion of the legislative authority that allows the SCAQMD to amend and adopt air pollution control rules, identifies general CEQA requirements and the intended uses of this CEQA document, areas of controversy and summarizes the remaining five chapters that comprise this ~~Draft~~Final EA.

### **Summary of Chapter 2 - Project Description**

The objective of the project is to partially implement 2007 AQMP Control Measure MSC-01 – Facility Modernization, which requires facilities not participating in the NOx Regional Clean Air Incentives Market (RECLAIM) Program to retrofit to current BACT or replace existing equipment with equipment that meets current BACT requirements at the end of a predetermined life span. PAR 1110.2 would also increase rule compliance by better monitoring, recordkeeping and reporting. PAR 1110.2 would implement Senate Bill (SB) 1298 distributed generation emission standards for new electrical generating engines and, address issues raised by EPA with the current Rule 1110.2.

### **Summary of Chapter 3 - Existing Setting**

Pursuant to the CEQA Guidelines §15125, Chapter 3 – Existing Setting, includes descriptions of those environmental areas that could be adversely affected by PAR 1110.2 as identified in the Initial Study (Appendix D). The following subsections briefly highlight the existing setting for aesthetics, air quality, energy, hazards/hazardous materials, and solid/hazardous waste, which were the only environmental areas identified that could potentially be adversely affected by implementing PAR 1110.2.

#### **Aesthetics**

ICEs are used for commercial and industrial applications. ICEs can be housed within buildings or placed outside. Depending on the placement of buildings and the size of the facility, the existing ICE system may or may not be visible from outside the property line.

#### **Air Quality**

SCAQMD staff conducted a survey in 2005 of non-agricultural, stationary, non-emergency engines. A total of 580 facilities were contacted, and 313 of those facilities responded (54 percent facility response rate). The survey collected data for 631 out of a total of 859 active engines (73.5 percent response rate based on number of engines). The resulting calculated total emissions for all survey engines were scaled up by category to account for the 76.3 percent representation rate.

A program of unannounced compliance testing conducted by SCAQMD's compliance department revealed that, although engines can generally meet emission limits when emission control systems are properly maintained and adjusted as is generally the case at the time of source testing; emissions during normal operation frequently exceed the emission limits. The resulting total calculated excess emissions for all stationary, non-emergency

engines in the district are 9,195 pounds of NO<sub>x</sub> per day, 2,517 pounds of VOC per day and 54,243 pounds of CO per day.

### **Energy**

The combined annual electricity production in Los Angeles, Orange, Riverside and San Bernardino County is 106,311 gigawatt-hours (gW-hours). The natural gas demand for California is approximately 5,732 million cubic feet per day. In 2001, refineries in California processed approximately 655 million barrels of crude oil.

California's Renewable Portfolio Standard (RPS) was developed under Senate Bills 1038, 1078, 1250 and 107. The senate bills require retail seller of electricity to increase the amount of renewable energy they procure by one percent each year until 20 percent of total retail sales are served with renewable energy by 2017.

The Energy Commission's 2003 Integrated Energy Policy Report recommended accelerating that goal to 2010, and the 2004 Energy Report Update further recommended increasing the target to 33 percent by 2020. The state's Energy Action Plan supported this goal. The PUC accelerated the RPS goal, requiring the utilities to obtain 20 percent of their power from renewables sources by 2010 (Senate Bill 107 codified this goal in state law).

On April 25, 2006, Governor Schwarzenegger signed Executive Order S-06-06. The Executive Order established targets for the production and use of biofuels and biopower, and directed state agencies with important biomass connections to work together to advance biomass programs in California, while providing environmental protection and mitigation. The Executive Order S-06-06 targets 20 percent biofuel by 2010, 40 percent by 2020 and 75 percent by 2050. Governor Schwarzenegger targeted biomass to contribute 20 percent of the 20 percent goal for renewable electricity generated under RPS for the 2010 and the 33 percent goal for 2020.

### **Hazards and Hazardous Materials**

The use, storage and transport of hazardous materials are subject to numerous laws and regulations at all levels of government. The most relevant existing hazardous materials laws and regulations include hazardous materials management planning, hazardous materials transportation, hazardous materials worker safety requirements, hazardous waste handling requirements and emergency response to hazardous materials and waste incidents. Potential risk of upset is a factor in the production, use, storage and transportation of hazardous materials. Risks of upset concerns are related to the risks of explosions or the release of hazardous substances in the event of an accident or upset conditions.

### **Solid/Hazardous Waste**

Landfills are permitted by the local enforcement agencies with concurrence from the California Integrated Waste Management Board (CIWMB). Local agencies establish the maximum amount of solid waste which can be received by a landfill each day and the operational life of a landfill. Based on a search of the California Integrated Waste Management Board's Solid Waste Information System (SWIS) on May 16, 2007, there are approximately 750,846,000 cubic yards (1,250,367,507 tons) of remaining capacity at Class



II and III facilities in Los Angeles, Orange County, Riverside and San Bernardino that accept construction waste. There are three Class I landfills in California: Chemical Waste Management Kettleman Hills in Kettleman City, CA; Clean Harbors Buttonwillow in Buttonwillow, CA, and Clean Harbors Westmorland in Westmorland, CA. Chemical Waste Management Kettleman Hills has a remaining capacity of 7,360,000 cubic yards with an estimated closure date of 2037. Clean Harbors Buttonwillow and Westmorland have a remaining capacity of 12,731,000 cubic yards with an estimated closure date of 2036.

#### **Summary of Chapter 4 - Environmental Impacts**

CEQA Guidelines §15126(a) requires that a CEQA document, "shall identify and focus on the significant environmental effects of the proposed project. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects."

The following subsections briefly summarize the analysis of potential adverse environmental impacts from the adoption and implementation of PAR 1110.2.

#### **Aesthetics**

In the NOP, SCAQMD staff stated that PAR 1110.2 would not require any new development, but may require minor modifications to building or other structures for retrofit or replacement. The NOP/IS concluded that modified or replacement equipment would not be substantially difference in physical appearance than the other existing commercial or industrial equipment at these facilities. It was concluded that retrofitted, replaced and/or new equipment would not obstruct scenic resources or degrade the existing visual character of a site, including but not limited to: trees, rock outcroppings, or historical buildings.

Subsequent to the release of the NOP, some biogas facilities stated they may choose to replace ICEs with biogas-to-LNG facilities, gas turbines, microturbines, boilers, or flares. A technology assessment will be completed in 2010 to verify that feasible control options are available to comply with PAR 1110.2 to prevent replacing biogas ICEs with continuous biogas flaring. If the technology assessment shows potential for flaring or that feasible control options for biogas engines are not available, staff will return to the Governing Board with a proposal to address any new significant adverse impacts, including rule changes if needed.

Biogas facility operators may choose to replace existing ICEs with biogas-to-LNG facilities, gas turbines, microturbines or boilers. Turbines, microturbines and boilers are similar in physical characteristics to ICE systems. It is unlikely that replacing ICEs with one of these technologies would modify the visual characteristics of the existing facilities. Because of the size of the biogas-to-LNG facilities, process equipment and truck loading racks, the equipment and truck loading operations may be visible from outside of the facility. In addition, the process equipment may need additional lighting. Therefore, the installation of a biogas-to-LNG facility may significantly alter the aesthetics of an existing facility.

### **Air Quality**

PAR 1110.2 would require the installation and operation of CEMs systems, air to fuel ratio controllers, CO analyzers, replacement of three way catalyst or installation of oxidation catalyst on non-biogas ICEs. Facility operators of biogas ICEs are expected to install retrofit emission control technology, such as oxidation catalyst and SCR or NOxTech systems. However, commenters have stated that the cost of SCR systems may make it more economical to remove the existing biogas ICEs and replace them with an alternative technology (boilers, gas turbines, microturbines, fuel cells, and biogas-to-LNG plants).

Commenters have stated that the cost of monitoring and control technology would make replacing biogas ICEs with LNG facilities, gas turbines, microturbines, boilers, or flares more economical. These alternative technologies could result in increases in some emissions. SCAQMD staff has committed to conduct a technology review in 2010 to verify that feasible control options for biogas engines are available and that ICEs would not be replaced with continuous flaring. If the technology assessment shows the potential for flaring, staff will return to the Governing Board with a proposal addressing any new significant adverse impacts, including rule changes if needed. Therefore, the replacement of ICEs with flares is not analyzed in this report.

Based on cost estimates it was determined that replacing certain non-biogas engines with electric motors would have cost savings over installing emission controls, monitoring and complying with inspection and maintenance (I & M) requirements. SCAQMD staff estimated that 75 percent of the operators with engines that have cost savings would voluntarily replace ICEs with electric motors. The technology assessment in 2010 will evaluate the number of existing ICEs that are voluntarily replaced with electric motors. Emissions from control technology (ammonia slip from SCR) or ICE replacement technology (gas turbines, biogas to liquefied natural gas facilities, etc.), and secondary emissions from delivery or haul trucks, and emergency engines were estimated and evaluated.

### **Criteria Pollutants**

Construction and operational emissions would occur concurrently; therefore, the emissions from both were added together. The resulting emissions were compared to SCAQMD operational criteria pollutant thresholds. The worst-case criteria emissions would occur if all biogas facility operators chose to replace ICEs with gas turbines. In this scenario, PAR 1110.2 would reduce 4,311 pounds of NOx per day, 46,868 pounds of CO per day, 1,995 pounds of VOC per day and 13 pounds of SOx per day. PM10 would increase by 142 pounds per day and PM2.5 would increase by 142 pounds per day. The PM10 increase would be below the significance threshold of 150 pounds per day. The PM2.5 emissions would be greater than the significance threshold of 55 pounds per day. Therefore, PAR 1110.2 would be significant for PM2.5 operational emissions.

### **Air Toxic Pollutants**

Health risk is evaluated on a localized level by evaluating the adverse impacts of a facility on the near-by community. Health risks were estimated from the largest aqueous ammonia emissions associated with SCR at an affected facility, the largest diesel exhaust emissions

from diesel emergency generators, and the largest amount of delivery trucks at an affected facility.

Only one of these scenarios would not typically occur at a single facility, since it was believed that biogas facility operators would install the same type of add-on control or ICE alternative technology for all biogas engines at a given facility. Therefore, biogas operators would either install SCR (ammonia), a biogas-to-LNG plant (diesel particulate from LNG trucks) or ICE alternative technology that would require an emergency generator (gas turbines or microturbines). However, some facilities have both non-biogas and biogas engines at the same facility. It is possible that a biogas facility would have emergency engines for both non-biogas electric motors and either SCR, a biogas-to-LNG plant or emergency generators for biogas ICE alternative technology.

The carcinogenic health risk from the facility with the largest number of diesel truck trips would be two in one billion ( $2.0 \times 10^{-9}$ ), which is less than the significant threshold of ten in one million ( $1.0 \times 10^{-5}$ ). The carcinogenic health risk from diesel emergency generators at the largest biogas facility would be 3.4 in one million ( $3.4 \times 10^{-6}$ ), which is less than the significant threshold of ten in a million. The carcinogenic health risk from the facility with the largest non-biogas emergency engine would be 18 in one million ( $1.8 \times 10^{-5}$ ), which is greater than the significance threshold of 10 in a million. Therefore, PAR 1110.2 would be significant for carcinogenic health risk from diesel particulate emissions.

Diesel particulate filters have been certified as at least 85 percent efficient for stationary diesel engines. This control efficiency would be enough to reduce the health risk to below the significance threshold of 10 in one million even if the greatest carcinogenic health risk from both the biogas and non-biogas emergency engines at single facilities were added together (3.4 in one million + 18 in one million = 21.4 in one million  $\times (1 - 0.85) = 3.2$  in one million). Therefore, diesel particulate filters would mitigate carcinogenic health risk from PAR 1110.2 to not significant.

The chronic non-carcinogenic hazard indices from diesel particulate matter at LNG facilities or facilities with emergency generators would be less than the significance threshold of 1.0. The chronic and acute hazard indices from ammonia slip at the largest facility would be less than the significance threshold of 1.0.

### **Global Warming**

Combustion processes generate greenhouse gas (GHG) emissions in addition to criteria pollutants. The GHG analysis focused on directly emitted CO<sub>2</sub> because this is the primary GHG pollutant emitted during the combustion process and is the GHG pollutant for which emission factors are most readily available. Since the half-life of CO<sub>2</sub> is approximately 100 years, for example, the effects of GHGs are longer-term, affecting global climate over a relatively long time frame. As a result, the SCAQMD current position is to evaluate GHG effects over a longer timeframe than a single day.

SCAQMD staff estimated that replacing certain non-biogas engines with electric motors would generate less cost than complying with the requirements of PAR 1110.2. SCAQMD

staff estimated that approximately 25 percent of these 225 engines with cost savings may not be replaced because of reasons other than cost. Therefore, 169 engines were assumed to be voluntarily replaced in the air quality analysis. As a worst-case (gas turbine biogas compliance option) it was estimated that at least 15 non-biogas engines would need to be replaced with electric motors to achieve overall CO<sub>2</sub> reductions from PAR 1110.2. It is possible that fewer than 169 non-biogas engines could be replaced with electric motors, but, given the lower costs of installing and operating electric motors, it is likely that at least 15 non-biogas engines or more would be replaced with electric motors.

## **Energy**

### **Total Energy Impacts**

Under the worst-case energy scenario (replacing digester gas engines with microturbines and landfill gas engines with LNG plants), PAR 1110.2 would reduce natural gas used by at least 181,719 MMBtu per year, which includes the voluntary replacement of existing non-biogas engines with electric motors where it costs less than complying with PAR 1110.2. The total electricity production loss by the worst-case biogas scenario (replacing digester gas engines with microturbines and landfill gas engines with LNG plants) would be 576,527 MW-hours per year which is less than one percent of 120,194 GW-hours per year available in Southern California. The maximum amount of diesel used in worst-case construction and operations would be 1,871 gallons of diesel per day, which is less than one percent of the 10 million gallons consumed per day in California, and therefore is less than significant.

### **Renewable Energy Impacts**

A technical assessment will be completed in 2010, which will verify that PAR 1110.2 would not cause biogas facility operators to replace existing ICEs with continuous flaring. If the technology assessment shows potential for flaring or that feasible control options for biogas engines are not available, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. Because of the technology assessment under PAR 1110.2, SCAQMD staff believes that facilities operators will either use add-on control or replace ICEs with alternative technologies that would either generate electricity or LNG; there would be only adverse impacts to renewable energy supplies from efficiency losses between the existing ICEs and the ICEs with add-on control or ICE replacement technologies. The largest electrical loss from renewable energy sources because of differences in efficiency between alternative technologies and the existing ICEs would be 101,013 MW-hours per year for the microturbines compliance option.

There may be adverse energy impacts in an individual government program, but any energy losses other than from efficiency losses from one program may be made up in another program. For example, if a landfill gas facility operator chooses to replace an existing biogas ICEs with a LNG facility, not only would there be a loss of electricity generation, but the LNG facility would need energy from the grid to operate. However, the landfill gas would not be wasted, but treated and sold as LNG, which is a renewable fuel. Therefore, while this might affect the California's Renewables Portfolio Standard (RPS), which focuses only on electricity, it would assist renewable fuel/biomass goals under Governor Schwarzenegger's Executive Order S-06-06.

## **Hazards and Hazardous Materials**

### **Ammonia Impacts**

SCR systems require either urea or ammonia. Urea would not result in offsite adverse impacts. The Executive Officer has prohibited the permitting of control technology using anhydrous ammonia. To further reduce hazards associated with ammonia, a permit condition that limits the aqueous ammonia concentration to 19 percent is typically required. Since 20 percent aqueous ammonia is evaluated by CalARP, adverse impacts from aqueous ammonia were evaluated based on the 20 percent aqueous ammonia in this document. The NOP/IS determined that adverse impacts from transport of aqueous ammonia would be less than significant. No comments were received on this analysis so no further evaluation was completed in this document. SCAQMD staff estimated that the largest aqueous ammonia tank would be 5,000 gallons. The toxic endpoint for a 5,000 gallon aqueous ammonia tank would be 0.1 miles. Based on a survey of biogas facilities, some facilities have receptors within 0.1 miles of the existing ICEs. Since it is assumed that aqueous ammonia tanks for SCR system would need to be relatively near to the existing ICEs, it is assumed that the toxic endpoint for aqueous ammonia from a catastrophic failure of the storage tank would significantly adversely affect the receptors within 0.1 miles of the ICEs. Therefore, PAR 1110.2 is significant for aqueous ammonia accidental release.

### **Liquefied Natural Gas Impacts**

Biogas to LNG plants would include LNG storage tanks. Based on the facility survey and design of the LNG facility at the Bowerman Landfill, the largest LNG tank would be 71,000 gallons. The overpressure from a catastrophic release of 71,000 gallons of LNG with a berm was estimated to be 0.2 mile. Based on a survey of biogas facilities, some facilities have receptors within 0.1 miles of the existing ICEs. Therefore, PAR 1110.2 is significant for LNG storage tank accidental release.

Four accidental release scenarios were identified for the transport of LNG: release of LNG into a pool that evaporates and disperses without ignition; the ignition of a flammable cloud, a boiling liquid expanding vapor explosion (BLEVE) occurs, or the tank ruptures, rockets away and ignites. The worst-case endpoint from these scenarios is 0.3 miles from a vapor cloud fire, BLEVE or where rocketing tank would land. Assuming that these accidents would occur near receptors, PAR 1110.2 is significant for LNG accidental release during transport.

The toxic endpoints and overpressures from facilities within a quarter mile of a schools or two miles of an airport or air field would not reach the schools, airport or air field.

### **Solid/Hazardous Waste**

The NOP/IS stated that solid/hazardous waste might be significantly adversely impacted by PAR 1110.2. Adverse solid/hazardous waste impacts are associated with the replacement of ICEs and the disposal of catalysts. The replacement of ICEs would occur once during construction. The replacement of catalyst would occur both during construction and operation. An analysis was completed that compared the capacities of existing solid and

hazardous waste landfills and it was determined that the adverse solid/hazardous waste impacts associated with PAR 1110.2 would not be significant.

### **Potential Environmental Impacts Found Not To Be Significant**

The Initial Study for PAR 1110.2 includes an environmental checklist of approximately 17 environmental topics to be evaluated for potential adverse impacts from a proposed project. Review of the proposed project at the NOP/IS stage identified air quality, energy, hazards/hazardous material and solid/hazardous waste for further review in the Draft EA. The Initial Study concluded that the project would have no significant direct or indirect adverse effects on the remaining environmental topics. During that public comment period, SCAQMD received two comment letter on the NOP/IS; however, no comments were received on the NOP/IS or at the public meetings that changed this conclusion. The comment letters and its response are included in Appendix E. However, during the analysis for the Draft EA, SCAQMD staff determined that aesthetics may be significantly adversely impacted by PAR 1110.2. The screening analysis concluded that the following environmental areas would not be significantly adversely affected by PAR 1110.2:

- agriculture resources
- biological resources
- cultural resources
- geology/soils
- hydrology and water quality
- land use and planning
- mineral resources
- noise
- population and housing
- public services
- recreation
- transportation/traffic

### **Consistency**

The Southern California Association of Governments (SCAG) and the SCAQMD have developed, with input from representatives of local government, the industry community, public health agencies, the United States Environmental Protection Agency (USEPA) - Region IX and the California Air Resources Board (CARB), guidance on how to assess consistency within the existing general development planning process in the Basin. Pursuant to the development and adoption of its Regional Comprehensive Plan Guide (RCPG), SCAG has developed an Intergovernmental Review Procedures Handbook (June 1, 1995). The SCAQMD also adopted criteria for assessing consistency with regional plans and the AQMP in its CEQA Air Quality Handbook. Analysis of the proposed project shows that it is consistent with the RCPG.

### **Summary Chapter 5 - Alternatives**

Four feasible alternatives to the proposed amended rule are summarized in Table 1-1: Alternative A (No Project), Alternative B (Low-Use Alternative), Alternative C (Compliance Only Alternative) and Alternative D (BACT). A comparison of the potential aesthetic and air quality adverse impacts from each of the project alternatives with PAR

1110.2 is given in Table 1-2. No other significant adverse impacts were identified for PAR 1110.2 or any of the project alternatives. The proposed project is significant for air quality from NO<sub>x</sub> emission during construction activities; for energy from total and renewable resource electricity adverse impacts, and for hazards/hazardous materials from accidental releases from aqueous ammonia storage and LNG transport and storage.

#### **Alternative A (No Project Alternative)**

Since Alternative A is the same as the existing setting, no significant construction emission impacts are expected. There would be no construction, so there would be no construction emissions. One of the primary reasons for amending Rule 1110.2 is to improve compliance with the emission concentrations of the rule by imposing CEMs requirements, inspection and monitoring plan requirements; monitoring, testing, recordkeeping, and reporting requirements; etc. By not amending Rule 1110.2, it is possible that a large number of affected engines would continue to operate out of compliance. NO<sub>x</sub>, CO and VOC emissions (9,195 lbs of NO<sub>x</sub> per day, 54,243 pounds of CO per day and 2,517 pounds of VOC per day) would exceed the significance criteria of 55 pounds per day of NO<sub>x</sub>, 550 pounds per day of CO and 55 pounds per day of VOC. Engines exceeding compliance limits could do so in amounts that exceed applicable SCAQMD significance thresholds. There would be no change in ICE operation so there would be no adverse energy impacts. There would be no change in control or operational equipment so there would be no new aqueous ammonia storage or LNG transport and storage. Because NO<sub>x</sub>, CO and VOC would be significant for Alternative A, it would not accomplish a major objective of the proposed project which is to further reduce NO<sub>x</sub>, CO and VOC emissions from ICEs. Since Alternative A does not implement the objective, the proposed project is preferred over Alternative A.

#### **Alternative B (Low Use Alternative)**

Alternative B would increase the low-use exception to concentration limits and extend the 15 minute averaging time for compliance limits to one hour. In PAR 1110.2, the low-use exception applies to ICEs that are used less than 500 hours per year or burn less than 1,000 MMBtu per year. Alternative B would increase the low-use exception to 1,000 hours or 2,000 MMBtu per year. Alternative B would include an exception for lean-burn engines from the CEMS requirement. These changes would require less new monitoring and control technology for low-use ICEs and for engines that can meet the compliance limit concentrations, but have fluctuations in concentrations. Alternative B also assumes that 169 non-biogas engines would be replaced by electric motors because there would be a cost savings over complying with PAR 1110.2. While there would be less new control technology installed overall, facility operators who need to install equipment, may still install that equipment at the same rate as proposed in PAR 1110.2. Operational emissions from Alternative B may be greater than PAR 1110.2 because less monitoring and emission controls are added. Therefore, to be conservative it is assumed that the adverse construction impacts from Alternative B would be similar to PAR 1110.2. Aesthetic, energy and hazards/hazardous material adverse impact are expected to be similar to PAR 1110.2 and therefore, significant. PAR 1110.2 would be preferred to Alternative B, because it would reduce more NO<sub>x</sub>, CO and VOC emissions, while still providing a low-use exemption.

**Alternative C (Compliance Only Alternative)**

Alternative C would keep the concentration compliance limits the same as the existing Rule 1110.2, but would add compliance requirements. It was assumed that no facilities would voluntarily replace existing ICEs with electric motors under Alternative C. Additional infrastructure and monitoring is not expected to change the visual character of the facility or surroundings, therefore, aesthetics would not be significant. Additional compliance requirements would not generate significant adverse construction or operational air quality impacts. Adverse energy impacts from monitoring equipment and travel associated with additional source test are expected to be minor; therefore, less than significant. Alternative C would have no significant hazards/hazardous material impacts, because hazards would not be generated from increased monitoring and source testing. Alternative C would not generate significant solid or hazardous waste from monitoring or source testing. Therefore, Alternative C would not be significant for any environmental topic. Alternative C would not generate any significant environmental impacts, but would not achieve as much emission reductions nor would Alternative C include the project objective of partly implement 2007 AQMP Control Measure MCS-01 – Facility Modernization.

**Alternative D (BACT Alternative)**

Alternative D, BACT Alternative, would lower compliance limits to BACT levels (11 ppm for NO<sub>x</sub>, 30 ppm for VOC and 70 ppm for CO). The compliance dates for the compliance limits were expanded from 2012 to 2014 for biogas engines as a natural life allowance. Alternative D would have adverse environmental impact similar to PAR 1110.2. Alternative D may exacerbate the adverse environmental impacts because larger or additional control may be required to meet the lower CO compliance concentration limits. Alternative D does include the same low-usage exemption as the proposed project. Alternative D would include a mandatory replacement of non-biogas engines for categories where there would be a cost savings over complying with PAR 1110.2. Alternative D would include an exception for facility operators that can demonstrate to the Executive Officer that other considerations would prevent the replacement of the existing ICEs with electric motors where there would be a cost savings over complying with PAR 1110.2. While in practice Alternative D would have greater adverse environmental impacts, the assumptions applied to PAR 1110.2 would also apply to Alternative D. Therefore, for this analysis the adverse environmental impacts from PAR 1110.2 and Alternative D would be similar. Alternative D would be significant for aesthetics, air quality, energy, and hazards/hazardous waste. PAR 1110.2 would be preferable to Alternative D, because the actual adverse impacts from PAR 1110.2 would be less than Alternative D. PAR 1110.2 includes lower CO compliance concentrations and low-use exception, which industry has requested based on cost effectiveness.

Since Alternatives A and C would not achieve proposed project objectives, the proposed project is preferred to Alternatives A and C. Since the proposed project would qualitatively be better than Alternative B, the proposed project is preferred to Alternative B. The proposed project is preferred to Alternative D, because it contains the low-use exception and higher CO compliance concentration limits, which industry has requested based on cost effectiveness. Therefore, the proposed project is preferred over the project alternatives.



**Summary Chapter 6 - Other CEQA Topics**

CEQA documents are required to address the potential for irreversible environmental changes, growth-inducing impacts and inconsistencies with regional plans. Consistent with the 2007 AQMP EIR, additional analysis of the proposed project confirms that it would not result in irreversible environmental changes or the irretrievable commitment of resources, foster economic or population growth or the construction of additional housing, or be inconsistent with regional plans.

**Table 1-1  
Summary of PAR 1110.2 and Project Alternatives**

Requirement	Proposed Project	Alternative A (No Project)	Alternative B (Low Use)	Alternative C ( <del>Compliance Only</del> Enhanced Compliance)	Alternative D (BACT)
Compliance Limits	11 ppm NOx 30 ppm VOC 250 ppm CO	<u>NOx VOC CO (ppm)</u> <u>Table I:</u> 11 30 70 <u>Table II:</u> 36 250 2,000 <u>Table III &gt; 50 bhp:</u> 36 250 NA <u>Table III &gt;50 bhp &lt; 500 bhp:</u> 45 250 NA	11 ppm NOx 30 ppm VOC 250 ppm CO	<u>NOx VOC CO (ppm)</u> <u>Table I:</u> 11 30 70 <u>Table II:</u> 36 250 2,000 <u>Table III &gt; 50 bhp:</u> 36 250 NA <u>Table III &gt;50 bhp &lt; 500 bhp:</u> 45 250 NA	11 ppm NOx 30 ppm VOC 70 ppm CO
Efficiency Correction for Biogas	No	Yes	No	No	No
Averaging Times	15 min	15 min	1 hour	15 min	15 min
Compliance Dates	<u>Emission limits</u> 2010 - 2012 <u>Monitoring</u> 2008 - 2010	N/A	<u>Emission limits</u> 2010 - 2012 <u>Monitoring</u> 2008 - 2010	<u>Monitoring</u> 2008 - 2010	<u>Emission limits</u> 2012 - 2014 <u>Monitoring</u> 2008 - 2010
Natural Life Allowance	None	N/A	None	None	Additional two years to comply with concentration limits
Natural Gas Percentage Limits	10	N/A	10	25	10
Low Usage Exception from Non-Biogas Compliance Limits	Less than 500 hours or less than 1,000 MMBtu annually	None	Less than 1,000 hours or less than 2,000 MMBtu annually	None	Same as PAR 1110.2
CEMS	Stationary ICE groups of 1,500 bhp ICEs or more included in CEMS unless < 500 bhp or operated <1,000 hr/yr or < 8 x 10 <sup>9</sup> Btu/year	N/A	Same as PAR 1110.2, except lean-burn engines are exempt from CEMS requirements	Same as PAR 1110.2	Same as PAR 1110.2

**Table 1-1 (concluded)**  
**Summary of PAR 1110.2 and Project Alternatives**

Requirement	Proposed Project	Alternative A (No Project)	Alternative B (Low Use)	Alternative C ( <del>Compliance Only</del> Enhanced Compliance)	Alternative D (BACT)
Replacement of Existing ICE with Electric Motors	Voluntary	None	Voluntary	None	Mandatory

**Table 1-2**  
**Comparison of Adverse Environmental Impacts of the Alternatives**

Environmental Topic	Proposed Project	Alternative A (No Project)	Alternative B (Low Use)	Alternative C ( <del>Compliance Only</del> Enhanced Compliance)	Alternative D (BACT)
<b>Aesthetics</b>	Significant	Not significant no Impact	Significant less than PAR 1110.2	Not significant	Significant Equivalent to PAR 1110.2
<b>Air Quality</b> Criteria	Significant	Significant, greater than PAR 1110.2	Significant Equivalent to PAR 1110.2	Not significant, less than PAR 1110.2	Significant Equivalent to PAR 1110.2
Toxic	Significant	Not significant, less than PAR 1110.2	<del>Not s</del> Significant, same as PAR 1110.2	Not significant, less than PAR 1110.2	<del>Not s</del> Significant, same as PAR 1110.2
Greenhouse Gas	Not significant beneficial effect	Not significant no beneficial effect	Not significant equivalent to PAR 1110.2	Not significant no beneficial effect	Not significant less than PAR 1110.2
<b>Energy</b> Electricity	Not significant	Not significant no Impact	Not significant, same as PAR 1110.2	Not significant, less than PAR 1110.2	Not significant Equivalent to PAR 1110.2
Natural Gas	Not significant beneficial effect	Not significant less than PAR 1110.2	Not significant Equivalent to PAR 1110.2	Not significant, less than PAR 1110.2	Not significant Equivalent to PAR 1110.2
Diesel	Not significant	Not significant no Impact	Not significant, less than PAR 1110.2	Not significant, less than PAR 1110.2	Not significant Equivalent to PAR 1110.2
<b>Hazards/Hazardous Material</b>	Significant	Not significant no Impact	Significant, same as PAR 1110.2	Not significant, less than PAR 1110.2	Significant Equivalent to PAR 1110.2
<b>Solid/Hazardous Waste</b>	Not significant	Not significant no Impact	Not significant, same as PAR 1110.2	Not significant, same as PAR 1110.2	Not significant Equivalent to PAR 1110.2

## **CHAPTER 2**

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### **PROJECT DESCRIPTION**

**Project Location**

**Background**

**Project Objective**

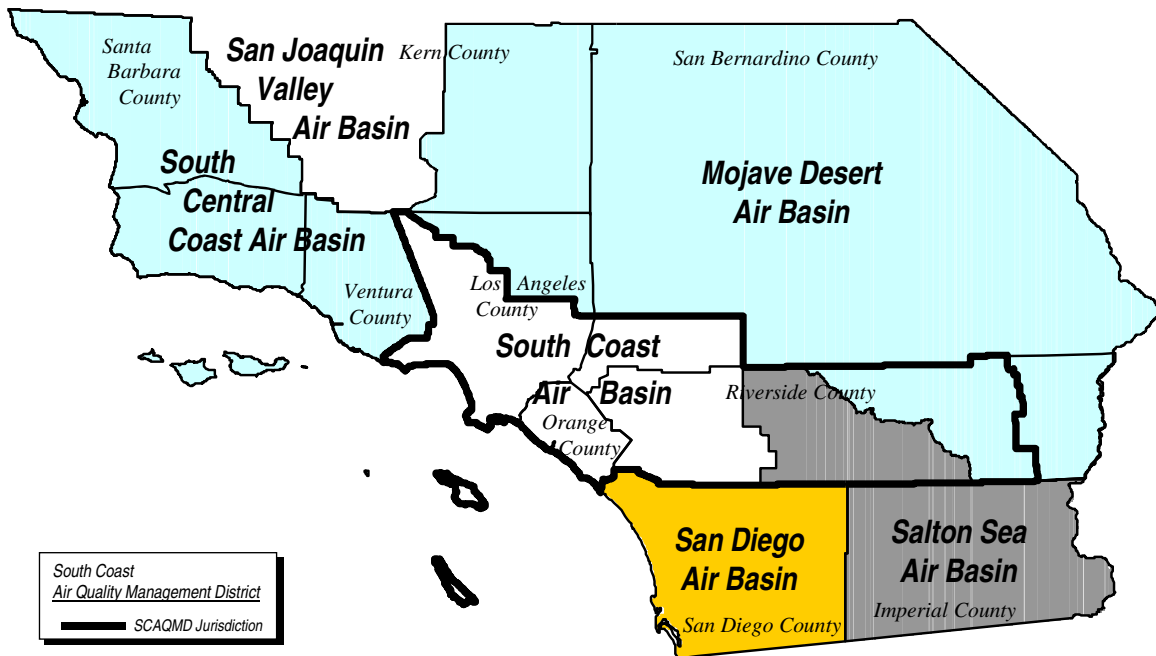
**Regulatory Background**

**Project Description**

**Control Technologies**

**PROJECT LOCATION**

The SCAQMD has jurisdiction over an area of 10,473 square miles (referred to hereafter as the district), consisting of the four-county South Coast Air Basin and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD’s jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of both Riverside County and the SSAB and is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 2-1).



**Figure 2-1**  
**South Coast Air Quality Management District**

## BACKGROUND

Rule 1110.2 was originally adopted in August 1990 to control NO<sub>x</sub>, carbon monoxide (CO), and VOC emissions from gaseous and liquid-fueled internal combustion engines (ICEs). For all stationary and portable engines over 50 brake horsepower (bhp), it required that either 1) NO<sub>x</sub> emissions be reduced over 90 percent, or; 2) the engines be permanently removed from service or replaced with electric motors. It was amended in September 1990 to clarify rule language. Rule 1110.2 was then amended in August and December of 1994 to modify the CO monitoring requirements and to clarify rule language. The amendment of November 1997 eliminated the requirement for continuous monitoring of CO, reduced the source testing requirement from once every year to once every three years, and exempted nonroad engines, including portable engines, from most requirements. The last amendment in June 2005 made the previously exempt agricultural engines subject to the rule.

### United States Environmental Protection Agency's Disapproval of Rule 1110.2

SCAQMD rules and regulations are submitted to both the California Air Resources Board and the United States Environmental Protection Agency (EPA) for approval and incorporation into the State Implementation Plan (SIP). EPA proposed the disapproval of Rule 1110.2, which means it cannot be incorporated into the SIP and, therefore, cannot contribute to the SCAQMD's attainment demonstration for state and national ambient air quality standards. EPA recommended the following to enable approval of the rule<sup>4</sup>:

- An inspection and monitoring plan similar to CARB' Reasonably Available Control Technology/Best Available Retrofit Control Technology (RACT/BARCT) document;
- Source testing every two years or 8,760 hours;
- Source testing at peak load as well as at under typical duty cycles; and
- Justification of the exemptions for engines at ski resorts, the far eastern portion of Riverside County, and San Clemente Island.

## PROJECT OBJECTIVE

PAR 1110.2 partially implements 2007 AQMP Control Measure MSC-01 – Facility Modernization, which requires facilities not participating in the NO<sub>x</sub> Regional Clean Air Incentives Market (RECLAIM) Program to retrofit or replace existing equipment at the end of a predetermined life span to achieve NO<sub>x</sub> emissions equivalent to BACT. In addition to achieving NO<sub>x</sub> emission reductions, one of the objectives of PAR 1110.2 is to achieve further VOC and CO emission reductions based on the cleanest available technologies. PAR 1110.2 would also increase engine compliance through improved monitoring, recordkeeping and reporting. PAR 1110.2 would partially implement SB 1298 distributed generation emission standards for new electrical generating engines. Finally, a major objective of PAR 1110.2 is to address issues identified by EPA relative to the existing version of Rule 1110.2, so it can be approved for incorporation into the SIP (~~see preceding discussion~~).

## REGULATORY BACKGROUND

There are three levels of regulatory requirements that apply to the affected facilities: 1) federal requirements (EPA); 2) state (CARB, and, 3) local (the SCAQMD). The following

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<sup>4</sup> Memorandum from Andrew Steckel of EPA to Laki Tisopulos of SCAQMD dated March 31, 2005.

is an overview of federal, state and local regulatory programs that are applicable to the affected operations.

### **Federal Requirements**

The federal Clean Air Act requires the SCAQMD to adopt an AQMP that identifies a control strategy to demonstrate compliance with the federal ambient air quality standards. To address this federal mandate, the 2007 AQMP for the district included AQMP Control Measure MCS-01 – Facility Modernization, which requires facilities to retrofit or replace their equipment to achieve emission levels equivalent to BACT. In addition, there are other federal requirements that apply to internal combustion engines. The following is a brief summary of these requirements.

### **New Source Performance Standards**

In a Consent Decree, EPA began working on New Source Performance Standards (NSPS) for new stationary ICEs. EPA recently finalized regulations for compression-ignition (CI or diesel) engines and has proposed regulations for spark-ignition (SI) engines. The Consent Decree requires standards for SI engines to be promulgated by December 2007.

### **Compression-Ignition Engine New Source Performance Standards (NSPS)**

On July 11, 2006, EPA issued final regulations to limit NO<sub>x</sub>, PM, CO and non-methane hydrocarbon (NMHC) emissions from stationary CI engines, which are contained in Subpart IIII of 40 CFR 60. The compression-ignition (CI) engines NSPS establishes requirements for manufacturers, owners, and operators of new (i.e. engines whose construction, modification or reconstruction began after July 11, 2005) stationary CI engines. The CIE NSPS requires the use of on-engine controls, after treatment and lower sulfur fuel to achieve the same emission standards as required for nonroad engines described in a later section. It also specifies monitoring, reporting, recordkeeping, and testing requirements. Except for CO, the emission standards are not as stringent as the limits in the current Rule 1110.2 until the Tier 4 emission standards go into effect from 2011 to 2015.

### **Spark-Ignition Engine New Source Performance Standards (SIE NSPS)**

On June 12, 2006, EPA issued proposed NSPS for stationary spark-ignition engines (SIE) that would apply to new (i.e. engines whose construction, modification or reconstruction began after a standard is proposed) stationary SI engines. The proposed new Subpart JJJJ of 40 CFR 60 will limit NO<sub>x</sub>, NMHC, and CO emissions. It also specifies monitoring, reporting, recordkeeping, and testing requirements.

The SIE NSPS requires the use of on-engine controls or after treatment to achieve the emission standards. For all SI engines less than 25 hp, gasoline SI engines and rich-burn propane engines, the emission limits are those in the EPA regulations for nonroad SI engines (40 CFR Parts 90 and 1048).

EPA NO<sub>x</sub> emission limits have been proposed for large natural gas, digester gas and landfill gas engines that are less stringent than the current Rule 1110.2. Facility operators in the district will be held to the more stringent SCAQMD Rule 1110.2 emission limit. The proposed CO and NMHC limits for the same engines are more stringent than the current Rule 1110.2, but not as stringent as SCAQMD BACT for new engines. The emission limits

start at 463 ppmvd CO and 203 ppmvd NMHC and drop to 232 ppmvd CO and 142 ppmvd NMHC by 2010/2011 for natural gas engines<sup>5</sup>. Landfill and digester gas engines are limited to 579 ppmvd CO and 203 ppmvd NMHC.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP)**

On June 15, 2004, the EPA issued a final rule to reduce hazardous air pollutant emissions (formaldehyde, acrolein, methanol, and acetaldehyde) from stationary engines, in the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP), Subpart ZZZZ of 40 CFR 63. The RICE NESHAP establishes requirements for large (greater than 500 horsepower) stationary engines, both CI and SI, located at major sources of hazardous air pollutants.

The RICE NESHAP requires installation of oxidation catalysts on lean-burn engines and three-way catalysts (also known as non-selective catalytic reduction (NSCR) catalysts) to reduce hazardous air pollutants and CO and specifies recordkeeping, monitoring, and testing requirements. The RICE NESHAP requires that:

- Existing and new 4-stroke rich burn (4SRB) engines either reduce formaldehyde by 76 percent or limit the formaldehyde concentration to 350 parts per billion.
- New 2-stroke lean burn (2SLB) engines either reduce carbon monoxide (CO) by 58 percent or limit the formaldehyde concentration to 12 parts per million.
- New 4-stroke lean burn (4SLB) engines either reduce CO by 93 percent or limit the formaldehyde concentration to 14 parts per million.
- New compression ignition (CI) engines either reduce CO by 70 percent or limit the formaldehyde concentration to 580 parts per billion.

Formaldehyde and CO are surrogates for reducing the air toxics of concern from RICE. Therefore, by reducing formaldehyde and CO, facilities also will reduce other organic air toxics. Similarly, reducing CO will reduce formaldehyde and vice versa.

Only two facility operators within the district have notified EPA that they are subject to the major source RICE NESHAP: the natural gas storage facilities in Northridge and Santa Clarita operated by Southern California Gas Company.

On June 12, 2006, EPA proposed amendments to Subpart ZZZZ that will apply to new or reconstructed RICEs less than 500 hp at major sources, and new or reconstructed RICEs at minor sources. In general these RICEs will only have to comply with the proposed RICE SI NSPS or the adopted RICE CI NSPS. The exception is that new SI 4SLB RICEs from 250 to 500 hp (not including digester or landfill gas fired RICEs) will have to reduce CO by 93 percent or limit the formaldehyde concentration to 14 ppmvd.

### **Nonroad Engines**

EPA regulates new nonroad engines, which include: engines that propel off-road equipment such as trains and bulldozers, and; portable engines that drive generators, wood chippers,

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<sup>5</sup> Corrected to 15 percent O<sub>2</sub> and assuming an engine efficiency of 30 percent based on higher heating value of the fuel.



and other equipment, and that are moved from place to place. Nonroad engines include CI and SI engines using diesel fuel, propane, gasoline and other fuels.

### **The Nonroad Preemption**

The Clean Air Act Amendments of 1990 limit the ability of states and local districts to regulate nonroad engines. Only EPA can set emission standards for new construction and farm equipment under 175 hp. Federal regulations<sup>6</sup> allow California to regulate all other nonroad engines with an authorization from EPA. Other states cannot regulate the use of nonroad engines, but can adopt California standards.

### **Nonroad Diesel Engine Regulations**

EPA has been regulating new nonroad diesels since 1996 pursuant to 40 CFR 89 Subpart A, Appendix A and 40 CFR 85 Subpart Q. Tier 1, Tier 2 and Tier 3 standards are in effect or are partly in effect and recently adopted and stringent Tier 4 standards will go into effect in the next decade. The emission standards vary by engine size, but as an example Table 2-1 shows the standards for nonroad diesel engines from greater or equal to 100 bhp to less than 175 bhp.

**Table 2-1**  
**EPA Nonroad Diesel Engine Emission Standards (grams/bhp-hr)**  
**175 ≤ hp < 300**

<b>Tier</b>	<b>Implementation Date</b>	<b>CO</b>	<b>NMHC</b>	<b>NO<sub>x</sub> + NMHC</b>	<b>NO<sub>x</sub></b>	<b>PM</b>
Tier 1	1996	8.5	1.0	-	6.9	-
Tier 2	2003	2.6	-	4.9	-	0.15
Tier 3	2006	2.6	-	3.0	-	0.15
Tier 4	2012-2014	2.6	0.14	-	0.30	0.015

### **Nonroad Spark-Ignited (SI) Engine Regulations**

EPA regulated new nonroad SI engines over 25 hp since 2004 pursuant to 40 CFR 1048. Most of these engines use liquefied petroleum gas (propane), with others operating on gasoline or natural gas. EPA adopted the two tiers of emission standards shown in Table 2-2. The first tier of standards, which became effective in 2004, is based on a simple laboratory measurement using steady-state procedures. The Tier 1 standards are the same as those adopted earlier by CARB for engines used in California. The Tier 2 standards, which became effective in 2007, are based on transient testing in the laboratory, which ensures that the engines will control emissions when they operate under changing speeds and loads in the different kinds of equipment. EPA includes an option for manufacturers to certify their engines to a less stringent CO standard if they certify an engine with lower HC plus NO<sub>x</sub>

<sup>6</sup> 40 CFR 89, Subpart A, Appendix A and 40 CFR 85, Subpart Q

emissions. In addition to these exhaust-emission controls, manufacturers must take steps starting in 2007 to reduce evaporative emissions, such as using pressurized fuel tanks.

**Table 2-2**  
**EPA SI Engine Emission Standards (grams/bhp-hr)**

<b>Tier</b>	<b>Implementation Date</b>	<b>HC + NO<sub>x</sub></b>	<b>CO</b>
Tier 1	2004	3.0	37
Tier 2	2007	2.0	4.4

Starting with Tier 2, EPA adopted additional requirements to ensure that engines control emissions during all kinds of normal operation in the field. Tier 2 engines must have engine diagnostic capabilities that alert the operator to malfunctions in the engine's emission-control system.

### **State Requirements**

The California Health and Safety Code also requires the SCAQMD to adopt an AQMP that identifies a control strategy demonstrating progress towards achieving the state ambient air quality standards. The CARB Governing Board adopted the SCAQMD's 2007 AQMP without substantial modification. CARB must submit the 2007 AQMP to EPA for final approval and incorporation into the SIP. The 2007 AQMP includes the control strategy MCS-01 – Facility Modernization, which proposes that existing equipment be retrofitted or replaced with BACT at the end of a pre-determined lifespan. PAR 1110.2 would require that existing ICEs be retrofitted or replaced with equipment that can meet BACT concentration standards.

### **Senate Bill 1298**

Senate Bill 1298<sup>7</sup> was adopted in 2000 by the California state legislature to close a loophole for small electric generators that were exempt from local district permits and not required to have emission controls. In accordance with the law, CARB adopted the Distributed Generation Certification Program<sup>8</sup> for small generators that are exempt from local district permitting requirements. Small generators include ICE generators of 50 hp or less, microturbines, and fuel cells. As of January 1, 2007 these electrical generation technologies may only be sold in California if they are certified by CARB to have emissions equivalent to, or better than large central generating stations equipped with BACT. SB 1298 also established a goal to have local districts require permitted distributed generation (DG) equipment meet BACT levels by the earliest practicable date.

### **CARB Guidance for Stationary Spark-Ignited Engines**

In 2001, CARB published "Determination of Reasonably Available Control Technology and Best Available Retrofit Control Technology for Stationary Spark-Ignited Internal Combustion Engines" as guidance for local air districts in adopting rules for stationary spark-ignited engines. Because of compliance problems with engines throughout the state,

<sup>7</sup> Sections 41514.9 and 41514.10 of the California State Health and Safety Code

<sup>8</sup> Sections 94200-94214, in Article 3, Subchapter 8, Chapter 1, Division 3 of Title 17, California Code of Regulations

CARB's publication recommended more frequent source testing than is currently required in Rule 1110.2 and an Inspection and Monitoring Plan requiring periodic monitoring and maintenance, including the use of a portable emissions analyzer.

### **Air Toxic Control Measures for Diesel Engines**

CARB has adopted Air Toxic Control Measures (ATCMs) for both stationary and portable diesel engines. The purpose of these ATCMs is primarily to reduce diesel PM because it has been classified as a carcinogen by CARB. However, the ATCMs often result in emission reductions of other pollutants as well.

### **Stationary Diesel ATCM – SCAQMD Rule 1470**

SCAQMD has adopted Rule 1470 to implement the state ATCM for stationary diesel engines. Rule 1470 requires emergency diesel engines to: limit the annual operating hours for maintenance and testing; avoid operation during school hours when near a school; and install a diesel particulate filter when located within 328 feet of a school. Non-emergency diesel engines, with some notable exceptions, must also install a diesel particulate filter to meet the required emission limit.

Existing stationary agricultural engines were not subject to the original stationary diesel ATCM, but on November 16, 2006, CARB adopted the first of several amendments to the ATCM that make existing stationary agricultural engines subject to the ATCM requirements. The most recent amendments to the ATCM relative to existing stationary agricultural engines have not yet received approval by the Office of Administrative Law. The ATCM requires the following for stationary agricultural diesel engines, not including wind machines, emergency engines, or engines less than 50 hp:

- Except for generator sets, uncertified engines from 51 to 750 hp must meet Tier 3 diesel PM emission requirements by December 31, 2010 or December 31, 2011, depending on horsepower. The compliance requirements of this ATCM will cause operators of engines eligible for the January 1, 2014 compliance date allowed by paragraph (h)(12) of PAR 1110.2 to have to retrofit or replace equipment sooner to comply with the ATCM.
- Generator sets, uncertified engines over 750 hp, and Tier 1 or Tier 2 engines must meet Tier 4 diesel PM emission requirements by December 31, 2014 or December 31, 2015, depending on horsepower. By these dates these same engines will already be required to be in compliance with PAR 1110.2.
- Operators must register their engines with local air pollution control districts by submitting detailed information about each engine. The regulation also allows local districts to charge fees for this registration.

### **Portable Diesel ATCM**

CARB adopted a portable diesel ATCM (§§93116 through 93116.5 of Title 17 of the California Code of Regulations) on February 24, 2004, which will have a substantial effect on portable diesel engines, including agricultural portable engines, greater than 50 hp. The ATCM requirements include:

- As of January 1, 2006, any newly permitted portable diesels must be certified to the current model year standards (Tier 2 or Tier 3 depending on the horsepower). However, CARB recently adopted emergency rules to loosen this requirement to allow resident Tier 1 and 2 engines to continue to operate.
- By January 1, 2010, uncertified portable diesels may no longer be used in California.
- Operators of portable diesel fleets must reduce the fleet average PM emissions to increasingly lower levels by 2013, 2017 and 2020 by engine replacements or retrofit of PM control devices.

Agricultural portable engines are subject to this ATCM, although CARB is developing regulations for agricultural portable engines.

### **CARB Portable Equipment Registration Program (PERP) Regulation**

Health & Safety Code §§41750-41755 (Assembly Bill 531), effective January 1, 1996, required CARB to adopt regulations to establish a statewide registration program for portable engines and other equipment. CARB adopted the regulation on March 27, 1997. Portable engine owners or operators may register under the statewide program or get a permit from SCAQMD. Those that register with CARB are exempt from AQMD permits and emission requirements. As of January 1, 2006, newly registered engines must be certified to the current model year emission standards (Tier 2 or Tier 3 depending on the horsepower). However, CARB adopted emergency rules to loosen this requirement to allow resident Tier 1 and 2 engines to continue to be registered. Portable agricultural engines are not eligible for the CARB PERP program.

### **Off-Road Diesel Engines**

CARB began regulating new off-road<sup>9</sup> diesel engines before EPA, but later harmonized its regulations in Title 13, Chapter 9, Article 4 of the California Code of Regulations (CCR) with EPA nonroad diesel emission standards. On December 9, 2004, CARB approved amendments to incorporate EPA Tier 4 standards into state law. The regulation is not final, however, until approved by the Office of Administrative Law. The NO<sub>x</sub>, non-methane hydrocarbon and PM emission standards will be the same as EPA's, but there are some minor differences in areas other than the emission standards.

### **Off-Road Spark-Ignited (SI) Engines**

CARB has been regulating new off-road SI engines over 25 hp since 2001 in Title 13, CCR, Chapter 9, Article 4.5. In May 2006, CARB adopted standards consistent with EPA for 2007 to 2009 model years, and more stringent standards starting in 2010. The emission standards are shown in Table 2-3.

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<sup>9</sup> EPA uses the term nonroad for the same purpose.

**Table 2-3  
CARB Off-Road SI Engine Emission Standards (grams/bhp-hr)**

Implementation Date	Engine Displacement	HC + NOx	CO
2002	≤ 1.0 Liters	9.0	410
2001-2003	> 1.0 Liters	3.0	37
2007-2009	> 1.0 Liters	2.0	3.3
2010	> 1.0 Liters	0.6	15.4

CARB also adopted fleet average emissions standards for forklifts, scrubbers/sweepers, industrial tow tractors and airport ground support equipment. Starting in 2009 fleet operators will have to reduce average HC plus NOx emissions by retrofits or replacements. By 2013, fleet average emissions will have to be reduced to 1.5 to 3.4 g/bhp-hr, depending on the type of fleet.

### **Distributed Generating Technologies that Meet CARB 2007 DG Standards**

Distributed energy resources are small-scale power generation technologies (typically in the range of three to 10,000 kW) located close to where electricity is used (e.g., a home or business) to provide an alternative to or an enhancement of the traditional electric power system. The distributed generating (DG) certification program requires manufacturers of electrical generation technologies that are exempt from district permit requirements to certify their technologies to specific emission standards before they can be sold in California. CARB has certified that the DG equipment shown in Table 2-4 meet the 2007 standards.

**Table 2-4  
Certified Technologies to CARB 2007 DG Standards**

Company Name	Technology
United Technologies Corporation Fuel Cells	200 kW, Phosphoric Acid Fuel Cell
FuelCell Energy, Inc.	250 kW, DFC300A Fuel Cell
Plug Power Inc.	5 kW, GenSys™ 5C Fuel Cell
FuelCell Energy, Inc.	1 MW, DFC1500 Fuel Cell
Ingersoll-Rand Energy Systems	250 kW, 250SM Microturbine
FuelCell Energy, Inc.	300 kW, DFC300MA Fuel Cell
ReliOn, Inc.	2 kW, T-2000 hydrogen-fueled fuel cell
ReliOn, Inc.	1.2 kW, T-1000 hydrogen-fueled fuel cell

The following DG technologies do not require CARB certification because they are normally required to be permitted by the SCAQMD. The following equipment can, however, also meet CARB's 2007 emission standards.

- Kawasaki GPB15X Gas Turbine—1.423 gross MW at ISO conditions (sea level, 59°F), guaranteed emission limits of 2.5 ppm NOx, six ppm CO and two ppm VOC, all dry

basis, corrected to 15 percent O<sub>2</sub>, down to 70 percent of rated load. These emission limits together with heat input of 20.7 MMBtu/hr (LHV) and 53.7 percent waste heat recovery specified by the manufacturer meet the CARB 2007 standards.

- Large combustion gas turbines with combined heat and power (CHP) are similar to the central station combined-cycle power plants that are the basis of the 2007 CARB DG standards.

Facility operators may install other DG technologies such as: zero-emission solar or wind DG. All of the preceding technologies are either inherently low-emission or will have CEMS to assure proper operation of their add-on emission controls.

### **Local SCAQMD Requirements**

ICEs are required to comply with SCAQMD administrative or prohibitory rules such as Rule 203 – Permit to Operate, Rule 401 – Visible Emissions, Rule 402 – Nuisance, Rule 404 – Particulate Matter- Concentration, and Rule 405 – Solid Particulate Matter – Weight. In addition to Rule 1110.2, other rules that control emissions from ICEs are summarized in the following subsections.

### **Regulation XIII**

Federal and state laws require the development and implementation of New Source Review (NSR) programs to ensure that the operation of new, modified, or relocated stationary emission sources in nonattainment areas does not interfere with the attainment and maintenance of National Ambient Air Quality Standards (NAAQS). Local NSR programs must, at a minimum, comply with the requirements established pursuant to federal and state law. The general requirements of NSR programs include: (1) pre-construction review; (2) the installation of air pollution control equipment; and, (3) the mitigation of emission increases by providing emission offsets.

To satisfy requirement (2), the SCAQMD requires BACT for any emissions increase greater than one pound per day from a new, modified, or relocated source within the district. BACT has historically been defined in SCAQMD NSR rules as the most stringent emission limit or control technology which has been achieved in practice for that category or class of source; or contained in a SIP; or other limit that is technologically feasible and cost-effective. SCAQMD rules require BACT for all sources to be at least as stringent as the lowest achievable emission rate (LAER) as defined in the federal Clean Air Act (CAA).

### **Rule 1470**

Rule 1470 applies to stationary compression ignition engines which are engines that remain in one location for 12 months or longer. Rule 1470 primarily regulates DPM emissions by establishing fuel use specifications, operating requirements and PM emission limits for existing diesel-powered engines. Rule 1470 also established emission standards for new stationary diesel engines less than or equal to 50 brake horsepower (bhp) installed after January 1, 2005 based on Title 13 §2423. Title 13 §2423 includes emission standards for NO<sub>x</sub>, VOC, NO<sub>x</sub> and VOC combined, CO and PM. Rule 1470 also includes recordkeeping, reporting and monitoring requirements, a compliance schedule, test methods and exemptions.

Although Rule 1470 is based on CARB's ATCM, it contains more stringent requirements for stationary diesel-fueled emergency standby and prime engines located on school grounds

or 100 meters or less from existing schools, resulting in reduced emissions of DPM and cancer risk to neighboring schools. Rule 1470 also prohibits non-emergency use (e.g., testing) of diesel emergency standby engines located on school grounds or 100 meters or less from existing schools when school activities are taking place.

### **Regulation XX – RECLAIM**

In 1993 SCAQMD adopted Regulation XX – RECLAIM. This regulation established a cap-and-trade NO<sub>x</sub> and SO<sub>x</sub> trading market, with declining annual emission reduction requirements, regulating more than 300 of the largest NO<sub>x</sub> and SO<sub>x</sub> sources in SCAQMD's jurisdiction. Operators of affected facilities are exempt from the requirements of specified NO<sub>x</sub> and SO<sub>x</sub> stationary source-specific SCAQMD Rules. The program allows facility operators flexibility with regard to complying with the declining NO<sub>x</sub> and SO<sub>x</sub> annual allocations, either through installing air pollution control equipment, purchasing RECLAIM trading credits, or a combination of the two.

RECLAIM facility operators are not subject to the source-specific NO<sub>x</sub> control requirements of Rule 1110.2. RECLAIM facility operators may decide as part of their compliance options to comply with their annual allocation under the program to install air pollution control equipment on ICEs. Although ICEs in the RECLAIM program are not subject to Rule 1110.2 NO<sub>x</sub> emission control requirements, they are still subject to the VOC and CO emissions control requirements of Rule 1110.2.

### **SCAQMD BACT Guidelines**

NO<sub>x</sub>, CO and VOC emission levels for stationary engines that are required by SCAQMD's non-major source BACT guidelines are shown in Table 2-5. These limits are typically met by rich-burn engines with a three-way catalyst (TWC), along with an air-to-fuel ratio controller (AFRC). Lean-burn engines generally come with low-NO<sub>x</sub> combustion modifications built into the engine by the manufacturer to reduce the emissions and then use SCR plus oxidation catalyst to reduce emissions to BACT levels.

**Table 2-5**  
**SCAQMD BACT Guidelines for Stationary Engines at Non-major Polluting Facilities**

Criteria Pollutant	PPMVD, corrected to 15% O <sub>2</sub>				Percent Reduction by Control Technology	
	Uncontrolled Emission		BACT		Rich-Burn (NSCR), %	Lean-Burn (SCR + CatOx), %
	Rich-Burn	Lean-Burn	Rich-Burn (NSCR)*	Lean-Burn (SCR + CatOx)		
NO <sub>x</sub>	590	1090	10	9	98+	99+
CO	1629	136	69	33	95+	75+
VOC	23	91	29	25	---	73+

\*Assuming engine is 30 percent efficient (HHV basis).

### **PROJECT DESCRIPTION**

Summaries of the proposed amendments to Rule 1110.2 by subdivision are provided in the following subsections. A copy of PAR 1110.2 can be found in Appendix B.

**Applicability**

PAR 1110.2 applies to all stationary and portable engines over 50 rated bhp.

**Definitions**

This subdivision lists keywords related to gaseous- and liquid fueled engines and defines them for clarity and to enhance enforceability. A new definition for “oxides of nitrogen” and revised definition of “approved emission control plan” and engine are proposed to simply clarify the intent of the rule. New definitions for “net electrical energy”, “operating cycle”, “rich-burn engine with a three-way catalyst”, “lean-burn engine” and “useful heat recovered” were developed to support the new requirements discussed later.

The definition of “engine” is revised to clarify that engines used to control VOC emissions from soil vapor extraction are subject to Rule 1110.2.

**Requirements**

Operators of affected operations would be required to comply with the following requirements by January 4, 2008 unless otherwise stated.

**Stationary Engines****Reduction of the Emission Concentration Limits**

Subparagraphs (d)(1)(B) and (d)(1)(C) currently limit NO<sub>x</sub>, VOC and CO concentrations to 36 (less than 500 bhp) or 45 (greater than 500 bhp), 250 and 2000 parts per million, dry volume (ppmvd) respectively for non-biogas-fired (non-landfill/non-digester gas) engines. The proposed amendments will reduce these limits by 2010 or 2011 to levels comparable to current BACT (see Table 2-6). This section provides a new exception from concentration limits effective on and after July 1, 2010 for engines that operate less than 500 hours per year or use less than 1x10<sup>9</sup> Btu per year of fuel. For two stroke engines with oxidation catalyst and insulated exhaust ducts and catalyst housing, case-by-case CO and VOC limits may be established by the Executive Officer with USEPA approval.

**Revisions to the Efficiency Correction for Stationary Engines**

The current rule in subparagraph (d)(1)Ⓞ(c) allows most stationary engines listed in Table III of the rule, to upwardly adjust the NO<sub>x</sub> and VOC ppmvd emission limits based on the actual engine efficiency or the manufacturer’s rated efficiency. More efficient engines are allowed higher ppmvd limits.

The proposed amended subparagraph (d)(1)Ⓞ(c) limits the efficiency correction to biogas-fired engines, requires that the correction be based on actual efficiency from (American Society of Mechanical Engineers) ASME test procedures, requires engines to use at least 90 percent biogas on a monthly basis, and requires the corrected emission limits to be stated on the operating permit. An allowance for burning more than 10 percent natural gas is provided if the only alternative to limiting natural gas to 10 percent would be shutting down engine and flaring more landfill or digester gas. In response to comments, several changes have been made to PAR 1110.2. The Executive Officer may approve more than the 10



percent natural gas if the 10 percent limit would result in more biogas flaring; or if more than 10 percent natural gas is required in order for an engine's waste heat boiler to provide enough thermal energy for a sewage treatment plant, and if other boilers are unable provide the needed thermal energy. Also, the 10 percent limit will be based on a facility average, rather than for each individual engine. Finally, the calculation of the monthly facility average natural gas percentage may exclude natural gas used during the following situations: during electrical outages; during Stage 2 or higher electrical emergencies called by the California Independent System Operator; and when rainfall causes a sewage treatment plant to exceed its design capacity. Once an engine complies with the emission limits effective July 1, 2012 there will be no limit on the percentage of natural gas burned.

**Table 2-6  
Proposed Concentration Limits for Non-Biogas Engines**

<b>CONCENTRATION LIMITS FOR NON- BIOGAS-FIRED ENGINES</b>			
Engine Size (bhp)	NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
≥ 500	36	250	2000
< 500	45		
<b>CONCENTRATION LIMITS EFFECTIVE JULY 1, 2010</b>			
Engine Size (bhp)	NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
≥ 500	11	bhp ≥ 500: 30	bhp ≥ 500: 250
< 500	45	bhp < 500: 250	bhp < 500: 2000
<b>CONCENTRATION LIMITS EFFECTIVE JULY 1, 2011</b>			
Engine Size (bhp)	NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
All Engines	11	30	250

<sup>1</sup> Corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Measured as carbon, corrected to 15 percent oxygen on a dry basis and averaged over 30 minutes.

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### **Emission Standards for Biogas Engines**

In addition to allowing biogas engines to continue to use an efficiency correction factor, the following emission concentration limits are proposed for biogas-fired engines:

**Table 2-7  
Proposed Concentration Limits for Biogas Engines**

<b>Concentration Limits For Landfill and Digester Gas-Fired Engines</b>			
Engine Size (bhp)	NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
≥ 500	bhp ≥ 500: 36 x ECF <sup>3</sup>	Landfill Gas: 40	2000
< 500	bhp < 500: 45 x ECF <sup>3</sup>	Digester Gas: 250 x ECF <sup>3</sup>	
<b>Concentration Limits Effective July 1, 2012</b>			
Engine Size (bhp)	NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
All Engines	11	30	250

<sup>1</sup> Corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Measured as carbon, corrected to 15 percent oxygen on a dry basis and averaged over 30 minutes.

<sup>3</sup> ECF is the efficiency correction factor.

Initially, only the VOC limit for landfill gas engines would change, to be consistent with other current requirements. In 2012, the emissions limits would drop to BACT levels, just as is proposed for non-biogas engines, except for CO. These emission limits would become effective provided that SCAQMD staff conducts a technology assessment and reports to the Governing Board by July 2010.

### **Air-to-Fuel Ratio Controllers**

The current rule doesn't require an air-to-fuel ratio controller (AFRC) for ICEs. The proposed amendments require ICEs without a CEMS or a Regulation XX (RECLAIM) approved CEMS to install an AFRC with an oxygen sensor and feedback control, or other equivalent technology approved by the Executive Officer, CARB and USEPA.

### **Emission Standards for New Non-Emergency Electrical Generation Engines**

New non-emergency electrical generation engines are proposed in subparagraph (d)(1)(F) to be subject to the emission standards in the following table.

**Table 2-8  
Proposed Emission Limits for New Electrical Generation Engines**

Pollutant	Emission Limit (lbs/MW-hr)
NO <sub>x</sub>	0.07
CO	<del>0.2</del> 0.10
VOC	<del>0.10</del> 0.02

These emission standards do not apply to biogas engines or engines installed before the date of rule adoption or for which an application has been deemed complete before October 1, 2007 and engines installed by an electric utility on Santa Catalina Island. In addition, notwithstanding Rule 2001, these emission standards do not apply to NO<sub>x</sub> emissions from new non-emergency engines driving electrical generators subject to Regulation XX (RECLAIM).

For engines that do not produce combined heat and power (CHP), the emission standards are based on the net electrical megawatt-hours (MWe-hours) produced. CHP (also known as cogeneration) engines may also take credit for the thermal megawatt-hours (MWth-hours) of useful heat produced, with one MWth-hour for each 3.4 million British thermal units (BTU). The thermal energy could take the form of hot water, steam or other medium.

For CHP engines, the operator will choose short-term emission limits in pounds per MWe-hours that the engine must meet at all times. The operator will also choose an annual electrical energy factor (EEF), such that when the short-term emission limit is multiplied by the annual EEF, the result does not exceed the values in the Table 1-3. The EEF is the annual net electrical energy produced divided by the sum of the electrical and thermal energy produced. The operator will have to also meet the annual EEF limit.

**Portable Engines**

Staff proposes to remove the emission limits and related requirements for portable engines in subparagraph (d)(2)(A) and add a reference to the California Air Resources Board (CARB)-adopted, portable diesel (Airborne Toxic Control Measures) ATCM and the Large Spark-Ignition Fleet Requirements, to which some portable engines are subject.

**Compliance**

Paragraphs (e)(1) and (e)(3) are proposed for deletion because they are not necessary. New paragraph (e)(2) includes schedules that will allow time for review and approval of applications for permits to construct, CEMS application, and I&M plan applications. Public agencies will be allowed one more year than the dates on the rule schedule for CEMS applications except for landfill or digester gas engines. New paragraphs (e)(3) through (e)(7) propose compliance schedules for non-agricultural engines required to meet the future emission limits, the stationary engine continuous emission monitoring system (CEMS) requirements, and the inspection and monitoring (I&M) plans. .

New engines will be required to comply with the new CEMS and I&M requirements when they begin operation.

Facilities with more than five engines without air-to-fuel ratio controllers are allowed an additional three months to install equipment on up to half of affected engines. The other facility operators that need to install AFRCs would follow the regular schedule which is one year from the date of rule adoption. An exception has been added for facilities that will be removing engines from service or replacing with electric motor and will not be required to comply with the earlier steps of this subdivision.

**Monitoring, Testing and Recordkeeping**

The primary focus of the proposed amendments in this subdivision is to improve the poor compliance record of stationary engines.

**Additional CEMS Requirements**

The existing subparagraph (f)(1)(A) requires 1,000 hp engines and larger, that produce two million bhp-hours per year or more to have a NO<sub>x</sub> CEMS that measures and records exhaust gas concentrations both uncorrected and corrected to 15 percent oxygen on a dry basis and have data gathering and retrieval capability approved by the Executive Officer. The proposed amendments add CO emissions monitoring back into the rule in subparagraph (f)(1)(A), as it was before the 1997 amendment, but only for rich-burn engines.

In addition, the CEMS requirement will be extended to stationary engines at facilities with multiple engines at the same location (within 75 feet of each other, measured from engine block to engine block) that have a cumulative stationary engine horsepower rating of 1,500 bhp or more. However, the following engines will not be counted toward the cumulative hp rating: engines rated at less than 500 bhp; standby engines that are limited by permit conditions to only operate when other primary engines are not operable; engines that are limited by permit conditions to operate less than 1,000 hours per year or a combined fuel

usage of less than  $8 \times 10^9$  Btu per year (higher heating value); and engines already required to have a CEMS.

To avoid circumvention of the requirements, groups of existing engines within 75 feet are based on their location on October 1, 2007. New engines must not be located farther than 75 feet from another engine unless the operator demonstrates to the Executive Officer that there is a space limitation or operational need.

Also, in cases where an operator has multiple engines for reliability purposes, with some as standby, the proposed rule would not require a group of engines to have a CEMS if there are permit conditions that limit the simultaneous operation in such a way that the maximum combined rating does not exceed 1,500 bhp.

The 500 bhp exception will reduce the number of new CEMS to less than 100. The other exceptions may reduce the number further, but staff isn't certain by how much.

Lean-burn engines are excluded from the requirement of a CO CEMS. Also excluded from a CO CEMS are engines in RECLAIM that are not required to have a NO<sub>x</sub> CEMS by Regulation XX.

To reduce the cost, the CEMS can be time-shared between all engines < 1000 hp.

Clause (f)(1)(A)(ix) will allow current CEMS operators to take their CEMS out of operation for up to two weeks in order to add the required CO CEMS.

New clauses (f)(1)(A)(vi) and (f)(1)(A)(vii) provides several exceptions to Rule 218 for the required new CEMS to make timesharing more feasible, and streamline the requirements. They include: allowing digital storage of data, instead of a strip chart; requiring relative accuracy testing on the same schedule as source testing, instead of annually. For timeshared CEMS, they include: requiring a 15-minute sampling time for each timeshared engine; allowing unequal sample line lengths; reducing the minimum number of relative accuracy tests to five for each engine; reducing cylinder gas audits to quarterly; not requiring NO<sub>2</sub> monitoring for rich-burn engines; allowing daily calibration error (CE) tests at the analyzer instead of at the probe tip, except for once per week (not requiring CEMS operation or calibration when there is a continuous record of engine non-operation).

### **Source Testing for Stationary Engines**

The current requirement of subparagraph (f)(1)(C) is that emissions testing be done once every three years. The proposed amendments increase the frequency of source testing to every two years, or 8,760 operating hours, whichever occurs first. The testing frequency may be decreased to once every three years if an engine has not operated more than 2,000 hours since last source test.

In addition, the following source testing reforms are proposed:

- Emissions must be tested at for at least 15 minutes at peak load and for at least 30 minutes during normal operation. The source test can no longer be at one load under

steady state conditions, unless that is the typical duty cycle. In addition NO<sub>x</sub> and CO must be tested for at least 15 minutes at actual peak load and actual minimum load. These two tests will not be required if the permit limits the engine to operating at one load.

- Pretests to determine if the engine needs repairs will not be allowed.
- The test must be conducted at least 40 operating hours or one week after any engine tuning or maintenance.
- If a test is started and shows non-compliance, it may not be aborted to allow engine tuning or repairs. The test must be completed and reported.
- A source testing contractor approved by SCAQMD must be used.
- A source test protocol must be submitted and approved by the District at least 60 days before the test is conducted. The protocol will also identify the critical parameters that will be measured during the test, as required by the Inspection and Maintenance Plan (discussed later). If longer than 60 days is needed to approve a protocol more time may be allowed to conduct test.
- SCAQMD must be notified of the test date.
- The test report must be submitted to SCAQMD within 60 days of the test date. This will assure that noncompliance will be reported.
- The operator must provide source testing facilities including sampling ports in the stack, safe sampling platforms, safe access to sampling platforms, and utilities for test equipment. Agricultural engines at remote locations that comply with California General Safety Orders are excused from this clause. Agricultural engines on wheels and moved to storage during the off-season are excused from this requirement.

### **Inspection and Monitoring (I&M) Plan for Stationary Engines**

An I&M Plan will be added to the rule in subparagraph (f)(1)(D). Except for engines monitored by a CEMS, stationary engine operators will submit to SCAQMD for approval an I&M Plan application for each facility to assure continued compliance of the engines between source tests. The I&M Plan will include identification of engine and control equipment operating parameters necessary to maintain pollutant concentrations within the rule and permit limits. This will include:

- Procedures for using a portable NO<sub>x</sub>, CO and oxygen analyzer to establish the set points of the air-to-fuel ratio controller and loads;
- Procedures for verifying the AFRC is controlling the engine to the set point during the daily monitoring;
- Procedures for reestablishing all AFRC set points with a portable NO<sub>x</sub>, CO and oxygen analyzer;
- For engines with catalysts, maximum allowed exhaust temperature at the catalyst inlet per manufacturer specifications;
- For lean-burn engine with selective catalytic control devices, minimum exhaust temperature at the catalyst inlet for reactant flow and procedures for using portable NO<sub>x</sub> and oxygen analyzer to establish acceptable reactant flow rate as a function of load;
- Procedures for at least every 150 operating hours, emissions checks by a portable NO<sub>x</sub>, CO and oxygen (O<sub>2</sub>) analyzer. The schedule can be reduced to monthly, or every 750 operating hours if three consecutive weekly tests show compliance. If the monthly test

is non-compliant or for rich-burn engines with three-way catalyst the oxygen sensor is replaced, then weekly tests must be resumed. For diesel engines and other lean-burn engines that are subject to Regulation XX or have a NO<sub>x</sub> CEMS, the CO emission check will be quarterly or every 2000 engine operating hours. In order to be representative of actual operation, the test will be conducted at least 72 hours after any engine or control system maintenance or tuning. Within 48 hours of finding an operating parameter out-of-range an additional emission check will need to be conducted. The portable analyzer will be calibrated, maintained and operated in accordance with the manufacturer's specifications and recommendations and the SCAQMD's "Protocol for the Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Sources Subject to South Coast Air Quality Management District Rule 1110.2"

- Procedures for at least daily recordkeeping of monitoring data and actions required by the plan, including formats of the recordkeeping of engine load or flow rate, set points, and the maximum and acceptable ranges of parameters identified by clause (f)(1)(D)(i), elapsed time meter hours, and hours since last emission check required;
- For rich-burn engines with TWCs, the difference of the exhaust temperature at the inlet and outlet of the catalyst which can indicate changes in the effectiveness of the catalyst;

An I&M Plan will not be required for an engine if it is required by this rule to have a NO<sub>x</sub> and CO CEMS or voluntarily has a NO<sub>x</sub> and CO CEMS.

### **Operating Log**

Because dual-fuel engines may consume both liquid and gaseous fuels, proposed paragraph (F)(1)(E) is proposed to require fuel use of both fuels to be logged, instead of either fuel.

### **New Non-Emergency Electrical Generating Engines**

New monitoring procedures are required for the proposed emission standards for new, non-emergency, electrical generating engines. All such engines will be required to monitor: the net electrical output (MWe-hours) of the engine generator system, which is the difference between the electrical output of the generator and the electricity consumed by the auxiliary equipment necessary to operate the engine generator and heat recovery equipment; and the useful heat recovered (MWth-hours), which is the thermal energy recovered and put to an actual useful purpose.

Emissions in pounds per MWe-hour must be calculated based on CEMS data, source tests, and weekly emission checks. Mass emissions will be calculated using an F factor method from EPA 40 CFR 60, Appendix A, Method 19, or other approved method. Because Method 19 does not directly address VOC and CO, necessary conversion factors are provided in the rule. An annual report is required to verify compliance with the annual EEF.

### **Portable Analyzer Training**

In order to assure that persons conducting the portable analyzer testing are properly trained to understand the equipment and the procedures for conducting testing, maintenance and calibration, subparagraph (f)(1)(G) requires persons to take a District-approved training

program and obtain a certification issued by the District. SCAQMD intends to conduct the training.

### **Reporting noncompliance to the Executive Officer**

If an engine owner/operator finds an engine to be operating outside the acceptable range for control equipment parameters, engine operating parameters, engine exhaust NO<sub>x</sub>, CO, VOC or oxygen concentrations, the owner/operator will: report the noncompliance within one hour in the same manner required by paragraph (b)(1) of Rule 430 – Breakdowns; immediately correct the noncompliance or shut down the engine within 24 hours or the end of an operating cycle, in the same manner as required by subparagraph (b)(3)(iv) of Rule 430; and comply with all requirements of Rule 430 if there was a breakdown.

Within seven calendar days after reported noncompliance has been corrected, but no later than thirty days from initial noncompliance date, operators will be required to submit a written noncompliance report which includes:

- Identification of equipment
- Duration of noncompliance
- Date of correction and information demonstrating compliance was achieved
- Types of excess emissions
- Quantification of excess emissions
- Determination of noncompliance as a result of operator error, neglect or improper operation or maintenance
- Verification that steps were immediately taken to correct noncompliance
- Description of corrective measures undertaken and/or to be undertaken to avoid similar noncompliance
- Photos or images of equipment which failed, if available

The rule provides a 72 hour window in which to report any engine or control system parameter which goes out of the acceptable range established by the Inspection and Monitoring plan or permit condition. In case of emergencies that prevent reporting all required information within the 72 hour limit, an allowance may be granted to extend the time of reporting.

### **Exemptions**

#### **Emergency, Flood Control and Fire Fighting Engines**

The current rule exempts several types of engines from the subdivision (d) emission limits. Paragraph (h)(2) exempts emergency engines while paragraph (h)(3) exempts fire fighting and flood control engines. The proposed amendments do the following: combine the exemptions into paragraph (h)(2); require all of these engines to operate less than 200 hours per year; and require that permits conditions specifically limit the annual operating hours. This exemption also applies to agricultural emergency standby engines that are exempt from permit and operate 200 hours or less per year.

### **Start up Exemption**

The current rule has no exemption during engine startups, after an engine overhaul or major repair requiring removal of a cylinder head or initial commissioning of new engine. The proposed amendments in paragraphs (h)(10),(11) and (12) will provide an exemption from:

- Startups for complying with the emission limits in the rule until emission controls reach operating temperature, but not longer than 30 minutes. AQMD may approve a longer period and make it a condition of the permit to operate;
- After an engine overhaul or major repair for a period not to exceed four operating hours;
- Initial commissioning of new engine for a period specified by permit conditions up to a maximum of 150 operating hours.

### **CONTROL TECHNOLOGIES**

Although Rule 1110.2 controls emissions from both liquid-fueled (e.g., gasoline and diesel) and gaseous-fueled (e.g., natural gas, biogas, etc.) ICEs, the majority of engines expected to be affected by PAR 1110.2 are gaseous-fueled ICEs. Control technologies that are anticipated to be used to comply with PAR 1110.2 are described relative to the gaseous fuel used by the ICE. For the purposes of this discussion and the analysis in Chapter 4, the two primary fuel types under consideration are non-biogas and biogas. Non-biogas refers to natural gas, which is a gaseous fossil fuel consisting primarily of methane, but also includes significant quantities of ethane, butane, propane, carbon dioxide, nitrogen, helium and hydrogen sulfide. Biogas typically refers to a (biofuel) gas produced by the anaerobic digestion or fermentation of organic matter including manure, sewage sludge, municipal solid waste, biodegradable waste or any other biodegradable feedstock, under anaerobic conditions. Biogas is comprised primarily of methane and carbon dioxide. In most cases, biogas from landfills and sewage treatment contains siloxanes. The following subsections summarize the various types of control technologies expected to be used to comply with PAR 1110.2, divided into the two main categories of non-biogas and biogas engines.

#### **Non-Biogas Engines – Retrofit Technologies**

To comply with PAR 1110.2 the following control technologies are expected to be used by operators of non-biogas engines: oxidation catalyst, selective catalytic reduction or improved non-selective catalytic reduction. These control technologies are summarized in the following subsections.

#### **Oxidation Catalyst**

To meet the compliance limits of PAR 1110.2, SCAQMD staff expects that operators of non-biogas, RECLAIM, lean-burn engines that were not subject to BACT to install oxidation catalysts. Oxidation catalysts have two simultaneous tasks: 1) oxidation of carbon monoxide to carbon dioxide ( $2\text{CO} + \text{O}_2 \rightarrow 2\text{CO}_2$ ) and 2) oxidation of unburned hydrocarbons (unburned and partially-burned fuel) to carbon dioxide and water ( $2\text{C}_x\text{H}_y + (2x+y/2)\text{O}_2 \rightarrow 2x\text{CO}_2 + y\text{H}_2\text{O}$ ). An oxidation catalyst contains materials (generally precious metals such as platinum or palladium) that promote oxidation reactions between oxygen, CO, and VOC to produce carbon dioxide and water vapor. These reactions occur when exhaust at the proper temperature and containing sufficient oxygen passes through the catalyst. Depending on the catalyst formulation, an oxidation catalyst may obtain reductions at temperatures as low as 300 or 400°F, although minimum temperatures in the 600 to 700°F



range are generally required to achieve maximum reductions. The catalyst will maintain adequate performance at temperatures typically as high as 1350°F before problems with physical degradation of the catalyst occur. In the case of rich-burn engines, where the exhaust does not contain enough oxygen to fully oxidize the CO and VOC in the exhaust, air can be injected into the exhaust upstream of the catalyst.

This type of catalytic converter is widely used on lean-burn engines to reduce hydrocarbon and carbon monoxide emissions.

The oxidation catalyst is a corrugated base metal substrate with an alumina wash coat loaded with precious metals such as platinum. The alumina is porous allowing for large surface areas to promote oxidation of any unreacted CO and hydrocarbons with oxygen remaining in the exhaust gas. Most oxidation catalysts can be retrofitted onto the engine without disruption of the existing design configuration.

### **Selective Catalytic Reduction**

Selective catalytic reduction (SCR) is a post-combustion control equipment that is considered to be BACT for new equipment and BARCT for existing equipment. SCR can be used, if cost-effective, for NO<sub>x</sub> control of combustion sources like engines, boilers, process heaters, and gas turbines and it is capable of reducing NO<sub>x</sub> emissions by as much as 90 percent or higher. A typical SCR system design consists of an ammonia or urea reductant storage tank, ammonia vaporization and injection equipment, an SCR reactor with catalyst, an exhaust stack plus ancillary electronic instrumentation and operations control equipment. The way an SCR system reduces NO<sub>x</sub> is by a matrix of nozzles injecting a mixture of reductant and air into the flue gas exhaust stream from the combustion equipment. As this mixture flows into the SCR reactor with catalyst, the catalyst, reductant, and oxygen in the flue gas exhaust react primarily (i.e., selectively) with NO and NO<sub>2</sub> to form nitrogen and water. The amount of reductant introduced into the SCR system is approximately a one-to-one molar ratio of reductant to NO<sub>x</sub> for optimum control efficiency, though the ratio may vary based on equipment-specific NO<sub>x</sub> reduction requirements. There are two main types of catalyst structures: the first type is one in which the catalyst is coated onto a metal structure and the second type is one with a ceramic-based catalyst onto which the catalyst components are calcified. Commercial catalysts used in SCRs are available in two forms: 1) solid, block configurations or 2) modules, plate or honeycomb type. Catalysts are comprised of a base material of titanium dioxide (TiO<sub>2</sub>) that is coated with either tungsten trioxide (WO<sub>3</sub>), molybdcic anhydride (MoO<sub>3</sub>), vanadium pentoxide (V<sub>2</sub>O<sub>5</sub>), or iron oxide (Fe<sub>2</sub>O<sub>3</sub>). These materials are used for SCRs because of their high activity, insensitivity to sulfur in the exhaust, and useful life span of approximately five years. Ultimately, the material composition of the catalyst is dependent upon the application and flue gas conditions such as gas composition, temperature, et cetera.

For conventional SCRs, the minimum temperature for NO<sub>x</sub> reduction is 500 degrees Fahrenheit (°F) and the maximum operating temperature for the catalyst is 800 °F. Zeolite SCR catalysts have a higher temperature operating range. Depending on the application, the type of fuel combusted, and the presence of sulfur compounds in the exhaust gas, the optimum flue gas temperature of an SCR system is case-by-case and will range between

550°F and 750°F to limit the occurrence of several undesirable side reactions at certain conditions. One of the major concerns associated with SCRs is the oxidation of sulfur dioxide (SO<sub>2</sub>) in the exhaust gas to sulfur trioxide (SO<sub>3</sub>) and the subsequent reaction between SO<sub>3</sub> and ammonia to form secondary particulates such as ammonium bisulfate or ammonium sulfate. The formation of either ammonium bisulfate or ammonium sulfate depends on the amount of SO<sub>3</sub> and ammonia present in the flue gas and can cause equipment plugging downstream of the catalyst. The presence of particulates, heavy metals and silica in the flue gas exhaust can also limit catalyst performance. The production of secondary particulates can be substantially minimized by reducing the quantity of injected ammonia, maintaining the exhaust temperature within a predetermined range, and maintaining a precise NO<sub>x</sub> to ammonia molar ratio to minimize the production of unreacted ammonia which is commonly referred to as ‘ammonia slip.’ Depending on the type of combustion equipment utilizing SCR technology, the typical amount of ammonia slip is typically zero to five ppm.

Lean-burn engines can use SCR to control NO<sub>x</sub>. All lean-burn, non-biogas engines are controlled with the exception of RECLAIM engines, which are exempt from the NO<sub>x</sub> limited Rule 1110.2.

### **Selective Non-catalytic Reduction**

Selective non-catalytic reduction (SNCR) is another post-combustion control technique used to reduce the quantity of NO<sub>x</sub> in the flue gas by injecting ammonia or urea. The main differences between SNCR and SCR is that the SNCR reaction between ammonia and NO<sub>x</sub> in the hot flue gas occurs without the need for a catalyst and at much higher temperatures (i.e., between 1,200°F to 2,000°F). The SNCR reaction is also affected by the short residence time of ammonia and the molar ratio between ammonia and the initial quantities of NO<sub>x</sub> such that small quantities of unreacted ammonia remains (i.e., ammonia slip) and is subsequently released in the flue gas. With a control efficiency ranging between 50 and 85 percent, SNCR does not achieve as great of NO<sub>x</sub> emission reductions as SCR. Therefore, SNCR would not be considered equivalent to BARCT unless combined with other NO<sub>x</sub> control technologies.

### **Three-way Catalyst**

Three-way catalysts reduce NO<sub>x</sub> in addition to oxidizing carbon monoxide and unburned hydrocarbons. The oxidation process is described above under the subheading oxidation catalysts. Reduction of NO<sub>x</sub> emissions requires an additional step. Platinum catalysis can be used to reduce NO<sub>x</sub> emissions. The NSCR catalyst promotes the chemical reduction of NO<sub>x</sub> in the presence of CO and VOC to produce oxygen and nitrogen. The three-way NSCR catalyst also contains materials that promote the oxidation of VOC and CO to form carbon dioxide and water vapor. To control NO<sub>x</sub>, CO, and VOC simultaneously, 3-way catalysts must operate in a narrow air/fuel ratio band (15.9 to 16.1 for natural gas-fired engines) that is close to stoichiometric. An electronic controller, which includes an oxygen sensor and feedback mechanism, is often necessary to maintain the air/fuel ratio in this narrow band. At this air/fuel ratio, the oxygen concentration in the exhaust is low, while concentrations of VOC and CO are not excessive.

The core, or substrate in modern catalytic converters is most often a ceramic honeycomb, however stainless steel foil honeycombs are also used. The purpose of the core is to "support the catalyst" and therefore it is often called a "catalyst support". In an effort to make converters more efficient, a washcoat is utilized, most often a mixture of silica and alumina. The washcoat, when added to the core, forms a rough, irregular surface which has a far greater surface area than the flat core surfaces, which is desirable to give the converter core a larger surface area and, therefore, more places for active precious metal sites. The catalyst is added to the washcoat (in suspension) before application to the core. The catalyst itself is most often a precious metal. Platinum is the most active catalyst and is widely used. However, it is not suitable for all applications because of unwanted additional reactions and/or cost. Palladium and rhodium are two other precious metals that are used. Platinum and rhodium are used as a reduction catalyst, while platinum and palladium are used as an oxidization catalyst.

### **Non-Biogas Engines – Replacement Technologies**

The cost of compliance (CEMS, I&M, add-on control technology, etc.) may make it less costly to remove the existing non-biogas ICEs and replace them with other technologies, primarily electric motors. Replacing ICEs with electric motors means they would no longer be subject to the requirements of PAR 1110.2. The follow briefly describes electric motors used as a non-biogas replacement technology.

### **Electric Motors**

An electric motor converts electrical energy into mechanical energy. Most electric motors work by electromagnetism, but motors based on other electromechanical phenomena, such as electrostatic forces and the piezoelectric effect, also exist. The fundamental principle upon which electromagnetic motors are based is that there is a mechanical force on any current-carrying wire contained within a magnetic field. The force is described by the Lorentz force law and is perpendicular to both the wire and the magnetic field. Most magnetic motors are rotary, but linear motors also exist. In a rotary motor, the rotating part (usually on the inside) is called the rotor, and the stationary part is called the stator. The rotor rotates because the wires and magnetic field are arranged so that a torque is developed about the rotor's axis. The motor contains electromagnets that are wound on a frame. Though this frame is often called the armature, the term is often erroneously applied. Correctly, the armature is that part of the motor across which the input voltage is supplied. Depending upon the design of the machine, either the rotor or the stator can serve as the armature.

For some operators, removing the existing ICEs driving pumps or compressors and replacing them electric motors may less costly when compared to the cost of complying with PAR 1110.2, which may include the costs of installing CEMS, inspection and maintenance, installing add-on control technology, etc. For the same reason, operators of ICE electrical generators may choose to simply shut the ICE down and buy electricity from the grid to operate the motors. Operators who choose this option, however, may also need to install an emergency backup generator. In the analysis of impacts in Chapter 4 SCAQMD staff assumed that 40 percent of the affected facility operators would use their existing ICEs for emergency backup generators and 20 percent were assumed to use diesel-fueled emergency

generators. The remaining 40 percent are not expected to need emergency generators. It is expected that this assumption is an over estimation since some facility operators would not require emergency generators.

### **Biogas Engines – Retrofit Technologies**

Emissions control of biogas engines typically requires biogas pre-treatment systems (BPTS) to remove siloxanes that would inactivate the catalysts. Biogas engines are expected to use a biogas pre-treatment system (BPTS) with SCR and oxidation catalyst (see the description SCR and oxidation catalysts in the subsections under “Non-biogas Engines), or use technologies that do not require BPTS, such as NOxTech or the CL.AIR® system. The following subsections briefly describe the NOxTech and CL.AIR® emissions control technologies for biogas engines.

### **Biogas Pre-Treatment Systems (BPTS)**

BPTSs are designed to remove siloxanes from biogas streams to prevent fouling of emissions control systems. Typically the system consists of a condenser followed by a vessel or vessels segmented with different layers of carbon or silica gel media. Each medium is designed to filter siloxane, H<sub>2</sub>S and VOCs, respectively. The change-out time for the vessel or vessels is approximately every 60 to 90 days. Inlet and outlet samples are taken at specific intervals to determine vessel condition. Tests have indicated that the control efficiency of BPTS produces non-detect levels of siloxanes, i.e., in the 100 ppb range.

### **NOx Tech Emissions Control for Biogas**

NOxTech is an emissions control system for diesel and biogas engines. Emissions of hydrocarbons, CO, soot, and NOx are reduced in a one-step process. Engine exhaust is preheated in annular heat exchange tubes in the NOxTech reactor. In the reaction chamber, injected fuel auto ignites in the preheated exhaust and self-sustains autocatalysis based on engine load and, with the injection of urea or ammonia, reduces NOx. NOxTech controls emissions auto catalytically by gas-phase reactions. The gas-phase autocatalysis is self-sustained by auto thermal combustion, so NOxTech is not affected by contaminants which poison, foul, and plug catalysts. Feedback from a NOx analyzer can trim chemical injection in combination with the feed forward control.

When temperature in the reaction chamber is controlled in the range of 1,400-1,550°F, criteria pollutants, including ammonia slip, are maintained to specified limits. Biogas is a suitable fuel for auto thermal combustion and NOxTech equipment limits the additional biogas consumption within five to 10 percent of the engine fuel rate. Heat recovery minimizes this fuel penalty.

### **CL.Air Exhaust Treatment System**

The CL.Air® system is designed for the post-combustion treatment of engine exhaust pollutants. The system is based on a regenerative heat exchanger and consists of two thermal storage media, a reaction chamber and a switching unit. The exhaust gas flows from the engine at a temperature of approximately 986°F via the switching unit into the first medium, where it is heated to approximately 1,472°F. For startup, the entering flue gas is

heated by electrical heating elements. In the reaction chamber, the exhaust gas reacts with the oxygen it contains, oxidizing carbon monoxide and HC to produce carbon dioxide and water.

The exhaust gas emits heat again as it passes through the second medium and at a temperature of 1,022°F to 1,058°F it reaches the switching unit, which directs it to the smokestack or a downstream waste heat boiler. After a flow period of two to three minutes the direction of flow is reversed, and the exhaust gas takes heat away from storage medium two and passes it on to storage medium one. In this manner, the energy requirement of the thermal reactor is minimized (i.e., no additional heating is required). The CL.Air® system is not typically subject to the fouling problems catalytic emission control systems would have.

### **Biogas Engines – Replacement Technologies**

The cost of compliance (CEMS, I&M, add-on control technology, etc.) may make it less costly to remove the existing biogas ICEs and replace them with other technologies. These technologies include boilers, gas turbines, microturbines, fuel cells and biogas-to-LNG systems. Replacing ICEs with the technologies described below means they would no longer be subject to the requirements of PAR 1110.2, but may be subject to other source-specific rules or regulations such as Regulation XIII – New Source Review. The follow is a description of each replacement technology.

#### **Boilers**

Boilers are steel or cast-iron pressure vessels designed to transfer heat from the combustion of a fuel to water contained in the vessel to produce hot water or steam. The principle components of a boiler are a burner, a firebox, heat exchanger and a means of creating and directing gas flow through the unit. Landfill gas-fired boilers in the district produce steam that drive electrical generators.

#### **Gas Turbines**

Gas turbines convert energy stored in a fluid into mechanical energy by channeling the fluid through a system of stationary and moving vanes. The moving vanes are attached to a rotor to turn either a shaft, producing work output in the form of torque, or to generate velocity and pressure energy in a jet. Gas turbines can be used in combined-cycle cogeneration and simple-cycle arrangements. Combined cycle systems are typically used for very large systems and generally have higher capital costs than simple cycle gas turbines. Although combined cycle systems are more efficient, thus, generating lower emissions, to be conservative the analysis of impacts in Chapter 4 assumed that simple-cycle systems, not combined cycle systems, would be a possible replacement for existing biogas engines in response to PAR 1110.2.

The CEC states that gas turbines generate relatively low amounts of NO<sub>x</sub> and CO and are fairly efficient when compared to ICEs. The most common turbines at landfills in California are Solar Turbines rated from one to five megawatts. The benefits of installing gas turbines are their lower maintenance and lower emissions, but they require more up front capital costs.

### **Microturbines**

Microturbines are small combustion turbines and are composed of a compressor, a combustor, a recuperator (some models), a turbine, a generator and an alternator. According to the CEC, microturbines are available in sizes between 30 and 150 kilowatts. The advantage of microturbines is their non-labor-intensive operation, although gas treatment systems with biogas are needed. Microturbines have reached commercial status at several biogas facilities in the district.

### **Fuel Cells**

Fuel cells use an electrochemical process that uses a catalyst to react hydrogen and oxygen, which produces direct current (DC) electricity, heat, CO<sub>2</sub> and water. According to the CEC, the two commercially available fuel cells for biogas application are molten carbonate fuel cells (MCFCs) and phosphoric acid fuel cells (PAFCs). Fuel cells consist of a fuel reformer to produce hydrogen from methane in biogas, fuel cell stack and inverter. Fuel cells generate negligible criteria pollutant emissions.

A BPTS is required to remove contaminants from biogas that would foul catalysts in the fuel reformer and stack. Fuel cells have high gas to energy conversion efficiencies, but have high capital cost. Since fuel cells generate negligible direct and indirect emissions, adverse environmental impacts were not analyzed further in this EA.

### **Biogas-to-Liquefied Natural Gas (LNG) Systems**

Biogas-to-LNG systems convert biogas to LNG and CO<sub>2</sub>. LNG is created when natural gas is cooled to minus 260°F, reducing six-hundred cubic feet of gas into one cubic foot of liquid methane. This process consists of several stages of compression and cooling. LNG plants would consist of a power generation building, programmable logic control/motor control center building, compress skids, refrigeration skids, liquefier skids, storage tanks and loading equipment. The plant is composed of vessels, compressors, pipes, valves, filters, coolers instruments and process components in six modules: purification, CO<sub>2</sub> removal, refrigeration, liquefaction and post purification, instrument air, and controls. An LNG storage and dispensing system is needed to transfer LNG from the facility to trucks.

The LNG facility at the Frank R. Bowerman Landfill in Irvine, California was used as a basis for the analysis in this report.<sup>10</sup> The Bowerman facility uses ICEs to supply power to the LNG facility. Since LNG systems are assumed to replace existing ICEs at affected facilities, it was assumed that facility operators who choose to install LNG plants in place of existing ICEs would use electricity from the power grid. Since the LNG facility would require some energy in the form of heat, it was assumed that operators that replace existing ICEs at affected facilities would install boilers to generate heat for the facility.

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<sup>10</sup> Prometheus Energy Company, Bowerman I Natural Gas Process Facility Project Description, prepared for SCAQMD, undated.

The Bowerman facility has a LNG storage tank that can store five days worth of LNG generated at the facility. Dr. John Barclay of Prometheus Energy has stated that typical design of LNG storage tanks includes a capacity of three days.<sup>11</sup>

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<sup>11</sup> Phone conversation between Dr. John Barclay, Chief Technology Officer of Prometheus Energy Company and James Koizumi of SCAQMD, August 1, 2007.

## **CHAPTER 3**

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### **EXISTING SETTING**

**Introduction**

**Aesthetics**

**Air Quality**

**Hazards/Hazardous Material**

**Solid/Hazardous Waste**



## **INTRODUCTION**

In order to determine the significance of the impacts associated with a proposed project, it is necessary to evaluate the project's impacts against the backdrop of the environment as it exists at the time the notice of preparation is published. The CEQA Guidelines defines "environment" as "the physical conditions that exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance" (CEQA Guidelines §15360; see also Public Resources Code §21060.5). Furthermore, a CEQA document must include a description of the physical environment in the vicinity of the project, as it exists at the time the notice of preparation is published, from both a local and regional perspective (CEQA Guidelines §15125). Therefore, the "environment" or "existing setting" against which a project's impacts are compared consists of the immediate, contemporaneous physical conditions at and around the project site (Remy, et al; 1996).

## **AESTHEICS**

### **General Affected Facilities**

ICEs are used for commercial and industrial applications. ICEs can be housed within buildings or placed outside. If placed within a building, the ICEs will have ducting to the outside of the building. Building and fire codes regulate the placement and height of the exhaust stack.

If placed outside ICEs may be placed within housing that protects the ICEs from weather and reduces noise or may be exposed to the elements. The majority of the ICE and related equipment with the exception of ducting is low in height and not visible to the surrounding area due to existing fencing along the property lines and existing structures currently within the facilities may buffer the view of such equipment.

### **Biogas Facilities**

#### **Digester Gas**

Digester gas facilities are placed industrial areas and are typically visibly industrial. Storage tanks and piping may be visible from outside the property line. Depending on the placement of buildings and the size of the facility, the existing ICE system may or may not be visible from outside the property line.

#### **Landfill Gas**

Active landfills are placed in industrial areas and are typically visibly industrial. Earthmoving equipment, heavy duty diesel transfer and disposal trucks may be seen from outside the property line. Depending on the placement of buildings and the size of the facility, the existing ICE system may or may not be visible from outside the property line.

## **AIR QUALITY**

It is the responsibility of the SCAQMD to ensure that state and federal ambient air quality standards are achieved and maintained in its geographical jurisdiction. Health-based air quality standards have been established by California and the federal government for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 microns (PM<sub>10</sub>), particulate matter less than 2.5 microns (PM<sub>2.5</sub>) sulfur dioxide (SO<sub>2</sub>) and lead. These standards were established to protect sensitive receptors with a margin of safety from adverse

health impacts due to exposure to air pollution. The California standards are more stringent than the federal standards and in the case of PM10 and SO<sub>2</sub>, far more stringent. California has also established standards for sulfate, visibility, hydrogen sulfide, and vinyl chloride. The state and national ambient air quality standards for each of these pollutants and their effects on health are summarized in Table 3-1. The SCAQMD monitors levels of various criteria pollutants at 34 monitoring stations. The 2004 air quality data from SCAQMD's monitoring stations are presented in Table 3-2.

**Table 3-1  
State and Federal Ambient Air Quality Standards**

<b>AIR POLLUTANT</b>	<b>STATE STANDARD Concentration/ Averaging Time</b>	<b>FEDERAL PRIMARY STANDARD Concentration/ Averaging Time (&gt;)</b>	<b>MOST RELEVANT EFFECTS</b>
Ozone	0.09 ppm, 1-hour average > 0.07 ppm, 8-hr avg.>	0.08 ppm, 8-hour average	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; (f) Property damage
Carbon Monoxide	9.0 ppm, 8-hour average> 20 ppm, 1-hour average>	9 ppm, 8-hour average 35 ppm, 1-hour average	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; (d) Possible increased risk to fetuses
Nitrogen Dioxide	0.18 ppm, 1-hour average> 0.030 ppm, annual average>	0.053 ppm, annual average	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; (c) Contribution to atmospheric discoloration

**Table 3-1 (Concluded)**  
**State and Federal Ambient Air Quality Standards**

<b>AIR POLLUTANT</b>	<b>STATE STANDARD Concentration/ Averaging Time</b>	<b>FEDERAL PRIMARY STANDARD Concentration/ Averaging Time (&gt;)</b>	<b>MOST RELEVANT EFFECTS</b>
Sulfur Dioxide	0.04 ppm, 24-hour average> 0.25 ppm, 1-hour average>	0.03 ppm, annual average 0.14 ppm, 24-hour average	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in person with asthma
Suspended Particulate Matter (PM10)	20 $\mu\text{g}/\text{m}^3$ , annual arithmetic mean > 50 $\mu\text{g}/\text{m}^3$ , 24-hour average>	150 $\mu\text{g}/\text{m}^3$ , 24-hour average	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; (c) Increased risk of premature death from heart or lung diseases in the elderly
Suspended Particulate Matter (PM2.5)	12 $\mu\text{g}/\text{m}^3$ , ann. arithmetic mean >	15 $\mu\text{g}/\text{m}^3$ , annual arithmetic mean 35 $\mu\text{g}/\text{m}^3$ , 24-hour average <sup>(1)</sup>	
Sulfates	25 $\mu\text{g}/\text{m}^3$ , 24-hour average>=	-- <sup>(2)</sup>	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) Property damage
Lead	1.5 $\mu\text{g}/\text{m}^3$ , 30-day average>=	1.5 $\mu\text{g}/\text{m}^3$ , calendar quarter	(a) Increased body burden; (b) Impairment of blood formation and nerve conduction
Visibility-Reducing Particles	In sufficient amount to give an extinction coefficient $>0.23 \text{ km}^{-1}$ (visual range less than 10 miles), with relative humidity $<70\%$ , 8-hour average (10am – 6pm, PST)	-- <sup>(2)</sup>	Visibility impairment on days when relative humidity is less than 70 percent

ppm = parts per million

(1) The U.S. EPA lowered the PM2.5 24-hour average standard from  $65\mu\text{g}/\text{m}^3$  to  $35\mu\text{g}/\text{m}^3$  in September 2006. The  $65\mu\text{g}/\text{m}^3$  standard will be in effect until 2010.

(2) No federal standard established.

**Table 3-2  
2006 Air Quality Data – South Coast Air Quality Management District**

CARBON MONOXIDE (CO)						
Source Receptor Area No.	Location of Air Monitoring Station	No. Days of Data	Max. Conc. (ppm, 1-hour)	Max. Conc. (ppm, 8-hour)	No. Days Standard Exceeded <sup>a</sup>	
					Federal ≥ 9.5 ppm, 8-hour	State > 9.0 ppm, 8-hour
<b>LOS ANGELES COUNTY (Co)</b>						
1	Central Los Angeles	362	3	2.6	0	0
2	Northwest Coast Los Angeles Co	365	3	2.0	0	0
3	Southwest Coast Los Angeles Co	363	3	2.3	0	0
4	South Coastal Los Angeles Co1	360	4	3.4	0	0
4	South Coastal Los Angeles Co2	--	--	--	--	--
6	West San Fernando Valley	365	5	3.4	0	0
7	East San Fernando Valley	365	4	3.5	0	0
8	West San Gabriel Valley	360	4	2.8	0	0
9	East San Gabriel Valley 1	365	2	1.7	0	0
9	East San Gabriel Valley 2	363	2	2.0	0	0
10	Pomona/Walnut Valley	365	3	2.1	0	0
11	South San Gabriel Valley	232*	3*	2.7*	0*	0*
12	South Central LA County	365	8	6.4	0	0
13	Santa Clarita Valley	363	2	1.3	0	0
<b>ORANGE COUNTY</b>						
16	North Orange County	362	6	3.0	0	0
17	Central Orange County	365	5	3.0	0	0
18	North Coastal Orange County	365	4	3.0	0	0
19	Saddleback Valley	365	2	1.8	0	0
<b>RIVERSIDE COUNTY</b>						
22	Norco/Corona	--	--	--	--	--
23	Metropolitan Riverside County 1	365	3	2.1	0	0
23	Metropolitan Riverside County 2	365	4	2.3	0	0
23	Mira Loma	364	4	2.7	0	0
24	Perris Valley	--	--	--	--	--
25	Lake Elsinore	362	1	1.0	0	0
29	Banning Airport	--	--	--	--	--
30	Coachella Valley 1**	365	2	1.0	0	0
30	Coachella Valley 2**	--	--	--	--	--
<b>SAN BERNARDINO COUNTY</b>						
32	NW San Bernardino Valley	360	3	1.8	0	0
33	SW San Bernardino Valley	--	--	--	--	--
34	Central San Bernardino Valley 1	365	3	2.0	0	0
34	Central San Bernardino Valley 2	364	3	2.3	0	0
35	East San Bernardino Valley	--	--	--	--	--
37	Central San Bernardino Mountains	--	--	--	--	--
38	East San Bernardino Mountains	--	--	--	--	--
<b>DISTRICT MAXIMUM</b>			8	6.4	0	0
<b>SOUTH COAST AIR BASIN</b>			8	6.4	0	0

## KEY:

ppm = parts per million parts of air, by volume	* Less than 12 full months of data. May not be representative.
-- = Pollutant not monitored	** Salton Sea Air Basin

- a) The federal 8-hour standard (8-hour average CO > 9 ppm) and state 8-hour standard (8-hour average CO > 9.0 ppm) were not exceeded. The federal and state 1-hour standards (35ppm and 20 ppm) were not exceeded, either.

**Table 3-2 (Continued)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

OZONE (O <sub>3</sub> )										
Source Rec. Area No.	Location of Air Monitoring Station	No. Days of Data	Max. Conc. (ppm, 1-hr)	Max. Conc. (ppm, 8-hr)	Fourth Highest Conc. (ppm, 8-hr)	Health Advisory ≥ 0.15 ppm, 1-hr	No. Days Standard Exceeded			
							Federal <sup>b)</sup>		State <sup>c)</sup>	
							> 0.12 ppm, 1-hr	> 0.08 ppm, 8-hr	> 0.09 ppm, 1-hr	> 0.07 ppm, 1-hr
<b>LOS ANGELES (LA) COUNTY (Co)</b>										
1	Central LA	362	0.11	0.079	0.077	0	0	0	8	4
2	NW Coastal LA Co	365	0.10	0.074	0.069	0	0	0	3	0
3	SW Coastal LA Co	360	0.08	0.066	0.062	0	0	0	0	0
4	South Coastal LA Co1	364	0.08	0.058	0.058	0	0	0	0	0
4	South Coastal LA Co2	--	--	--	--	--	--	--	--	--
6	West San Fernando V	361	0.16	0.108	0.105	1	6	17	32	39
7	East San Fernando V	365	0.17	0.128	0.099	2	6	12	25	23
8	W San Gabriel Valley	365	0.15	0.117	0.095	1	5	7	25	24
9	E San Gabriel Valley 1	364	0.17	0.120	0.091	2	7	10	23	19
9	E San Gabriel Valley 2	363	0.18	0.128	0.107	2	10	15	37	31
10	Pomona/Walnut Valley	365	0.15	0.128	0.109	2	9	16	32	30
11	S San Gabriel Valley	250*	0.13*	0.095*	0.080*	0*	1*	3*	9*	5*
12	South Central LA Co	365	0.09	0.066	0.064	0	0	0	0	0
13	Santa Clarita Valley	359	0.16	0.120	0.112	1	20	40	62	64
<b>ORANGE (OR) COUNTY (Co)</b>										
16	North Orange Co	362	0.15	0.114	0.092	1	3	4	8	9
17	Central Orange Co	365	0.11	0.088	0.072	0	0	1	5	3
18	North Coastal OR Co	365	0.07	0.064	0.062	0	0	0	0	0
19	Saddleback Valley	356	0.12	0.105	0.092	0	0	6	13	17
<b>RIVERSIDE (RV) COUNTY (Co)</b>										
22	Norco/Corona	--	--	--	--	--	--	--	--	--
23	Metropolitan RV Co 1	365	0.15	0.116	0.113	1	8	30	45	59
23	Metropolitan RV Co 2	--	--	--	--	--	--	--	--	--
23	Mira Loma	364	0.16	0.119	0.107	1	4	25	39	48
24	Perris Valley	351	0.17	0.122	0.114	3	12	53	76	84
25	Lake Elsinore	362	0.14	0.109	0.102	0	3	24	40	58
29	Banning Airport	357	0.14	0.115	0.104	0	8	44	57	78
30	Coachella Valley 1**	361	0.13	0.109	0.101	0	2	23	37	67
30	Coachella Valley 2**	364	0.10	0.089	0.087	0	0	7	4	29
<b>SAN BERNARDINO (SB) COUNTY</b>										
32	Northwest SB Valley	365	0.17	0.130	0.114	2	14	25	50	54
33	Southwest SB Valley	--	--	--	--	--	--	--	--	--
34	Central SB Valley 1	361	0.16	0.123	0.116	1	12	29	47	49
34	Central SB Valley 2	362	0.15	0.127	0.119	3	10	29	52	57
35	East SB Valley	365	0.16	0.135	0.125	5	11	36	60	64
37	Central SB Mountains	365	0.16	0.142	0.112	2	9	59	71	96
38	East SB Mountains	--	--	--	--	--	--	--	--	--
<b>DISTRICT MAXIMUM</b>			0.18	0.142	0.125	5	20	59	76	96
<b>SOUTH COAST AIR BASIN</b>			0.18	0.142	0.125	10	35	86	102	121

**KEY:**

ppm = parts per million parts of air, by volume	* Less than 12 full months of data. May not be representative.
-- = Pollutant not monitored	** Salton Sea Air Basin

b) The federal 1-hour ozone standard was revoked and replaced by the 8-hour average ozone standard effective June 15, 2005.

The 8-hour average California ozone standard of 0.07 ppm was established effective May 17, 2006.

c) The state standard is 1-hour average NO<sub>2</sub> > 0.25 ppm. The federal standard is annual arithmetic mean NO<sub>2</sub> > 0.0534 ppm. Air Resources Board has approved to lower the NO<sub>2</sub> 1-hour standard to 0.18 ppm and establish a new annual standard of 0.030 ppm. The revisions are expected to become effective later in 2007.

**Table 3-2 (Continued)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

NITROGEN DIOXIDE (NO <sub>2</sub> )				
Source Receptor Area No.	Location of Air Monitoring Station	No. Days of Data	Max. Conc. (ppm, 1-hour <sup>d</sup> )	Annual Average <sup>d</sup> AAM Conc. (ppm)
<b>LOS ANGELES COUNTY</b>				
1	Central Los Angeles	360	0.11	0.0288
2	Northwest Coastal Los Angeles Co	365	0.08	0.0173
3	Southwest Coastal Los Angeles Co	351	0.10	0.0155
4	South Coastal Los Angeles Co1	357	0.10	0.0215
4	South Coastal Los Angeles Co2	--	--	--
6	West San Fernando Valley	363	0.07	0.0174
7	East San Fernando Valley	365	0.10	0.0274
8	West San Gabriel Valley	365	0.12	0.0245
9	East San Gabriel Valley 1	365	0.11	0.0258
9	East San Gabriel Valley 2	362	0.10	0.0206
10	Pomona/Walnut Valley	365	0.10	0.0307
11	South San Gabriel Valley	204*	0.10*	0.0283*
12	South Central LA County	363	0.14	0.0306
13	Santa Clarita Valley	359	0.08	0.0184
<b>ORANGE COUNTY</b>				
16	North Orange County	361	0.09	0.0224
17	Central Orange County	343	0.11	0.0197
18	North Coastal Orange County	361	0.10	0.0145
19	Saddleback Valley	--	--	--
<b>RIVERSIDE COUNTY</b>				
22	Norco/Corona	--	--	--
23	Metropolitan Riverside County 1	365	0.08	0.0199
23	Metropolitan Riverside County 2	--	--	--
23	Mira Loma	332	0.08	0.0194
24	Perris Valley	--	--	--
25	Lake Elsinore	352	0.07	0.0151
29	Banning Airport	355	0.11	0.0161
30	Coachella Valley 1**	359	0.09	0.0103
30	Coachella Valley 2**	--	--	--
<b>SAN BERNARDINO COUNTY</b>				
32	Northwest SB Valley	337	0.10	0.0310
33	Southwest SB Valley	--	--	--
34	Central SB Valley 1	362	0.09	0.0270
34	Central SB Valley 2	362	0.09	0.0252
35	East SB Valley	--	--	--
37	Central SB Mountains	--	--	--
38	East SB Mountains	--	--	--
DISTRICT MAXIMUM			0.14	0.0310
SOUTH COAST AIR BASIN			0.14	0.0310

**KEY:**

ppm = parts per million parts of air, by volume	* Less than 12 full months of data. May not be representative.
AAM = Annual Arithmetic Mean	** Salton Sea Air Basin
-- = Pollutant not monitored	

d) The state standards are 1-hour average SO<sub>2</sub> > 0.25 ppm and 24-hour average SO<sub>2</sub> > 0.04 ppm. The federal standards are annual arithmetic mean SO<sub>2</sub> > 0.03 ppm, 24-hour average > 0.14 ppm, and 3-hour average > 0.50 ppm. The federal and state SO<sub>2</sub> standards were not exceeded.

**Table 3-2 (Continued)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

SULFUR DIOXIDE (SO <sub>2</sub> )				
Source Receptor Area No.	Location of Air Monitoring Station	No. Days of Data	Maximum Concentration <sup>e)</sup>	
			(ppm, 1-hour)	(ppm, 24-hour)
<b>LOS ANGELES COUNTY</b>				
1	Central Los Angeles	365	0.03	0.006
2	Northwest Coast Los Angeles County	--	--	--
3	Southwest Coast Los Angeles County	363	0.02	0.006
4	South Coastal Los Angeles County 1	364	0.03	0.010
4	South Coastal Los Angeles County 2	--	--	--
6	West San Fernando Valley	--	--	--
7	East San Fernando Valley	360	0.01	0.004
8	West San Gabriel Valley	--	--	--
9	East San Gabriel Valley 1	--	--	--
9	East San Gabriel Valley 2	--	--	--
10	Pomona/Walnut Valley	--	--	--
11	South San Gabriel Valley	--	--	--
12	South Central LA County	--	--	--
13	Santa Clarita Valley	--	--	--
<b>ORANGE COUNTY</b>				
16	North Orange County	--	--	--
17	Central Orange County	--	--	--
18	North Coastal Orange County	353	0.01	0.004
19	Saddleback Valley	--	--	--
<b>RIVERSIDE COUNTY</b>				
22	Norco/Corona	--	--	--
23	Metropolitan Riverside County 1	365	0.01	0.004
23	Metropolitan Riverside County 2	--	--	--
23	Mira Loma	--	--	--
24	Perris Valley	--	--	--
25	Lake Elsinore	--	--	--
29	Banning Airport	--	--	--
30	Coachella Valley 1**	--	--	--
30	Coachella Valley 2**	--	--	--
<b>SAN BERNARDINO COUNTY</b>				
32	Northwest San Bernardino Valley	--	--	--
33	Southwest San Bernardino Valley	--	--	--
34	Central San Bernardino Valley 1	365	0.01	0.003
34	Central San Bernardino Valley 2	--	--	--
35	East San Bernardino Valley	--	--	--
37	Central San Bernardino Mountains	--	--	--
38	East San Bernardino Mountains	--	--	--
DISTRICT MAXIMUM			0.03	0.010
SOUTH COAST AIR BASIN			0.03	0.010

**KEY:**

ppm = parts per million parts of air, by volume	* Less than 12 full months of data. May not be representative.
-- = Pollutant not monitored	** Salton Sea Air Basin

e) PM10 samples were collected every 6 days at all sites except for Station Number 4144 and 4157 where samples were collected every 3 days.

**Table 3-2 (Continued)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

SUSPENDED PARTICULATE MATTER PM10 <sup>f</sup> ,						
Source Receptor Area No.	Location of Air Monitoring Station	No. Days of Data	Max. Conc. ( $\mu\text{g}/\text{m}^3$ , 24-hour)	No. (%) Samples Exceeding Standard		Annual Average <sup>i)</sup> AAM Conc. ( $\mu\text{g}/\text{m}^3$ )
				Federal > 150 $\mu\text{g}/\text{m}^3$ , 24-hour	State > 50 $\mu\text{g}/\text{m}^3$ , 24-hour	
<b>LOS ANGELES COUNTY (Co)</b>						
1	Central Los Angeles	59	59	0	3(5.1)	30.3
2	NW Coastal Los Angeles County	--	--	--	--	--
3	SW Coast Los Angeles County2	51	45	0	0	26.5
4	South Coastal Los Angeles County1	61	78	0	6(9.8)	31.1
4	South Coastal Los Angeles County2	58	117	0	19(32.7)	45.0
6	West San Fernando Valley	--	--	--	--	--
7	East San Fernando Valley	54	71	0	10(18.5)	35.6
8	West San Fernando Valley	--	--	--	--	--
9	East San Gabriel Valley 1	58	81	0	7(12.1)	31.9
9	East San Gabriel Valley 2	--	--	--	--	--
10	Pomona/Walnut Valley	--	--	--	--	--
11	South San Gabriel Valley	--	--	--	--	--
12	South Central LA County	--	--	--	--	--
13	Santa Clarita Valley	58	53	0	1(1.7)	23.4
<b>ORANGE COUNTY</b>						
16	North Orange County	--	--	--	--	--
17	Central Orange County	56	104	0	7(12.5)	33.4
18	North Coastal Orange County	--	--	--	--	--
19	Saddleback Valley	50	57	0	1(2.0)	22.8
<b>RIVERSIDE COUNTY</b>						
22	Norco/Corona	57	74	0	10(17.5)	36.5
23	Metropolitan Riverside County 1	118	109	0	71(60.2)	54.4
23	Metropolitan Riverside County 2	--	--	--	--	--
23	Mira Loma	59	124	0	41(69.5)	64.0
24	Perris Valley	54	125	0	19(35.2)	45.0
25	Lake Elsinore	--	--	--	--	--
29	Banning Airport	55	75	0	8(14.6)	31.1
30	Coachella Valley 1**	57	73+	0+	2(3.5)+	24.5+
30	Coachella Valley 2**	115	122+	0+	57(49.6)+	52.7+
<b>SAN BERNARDINO COUNTY-</b>						
32	NW San Bernardino Valley	--	--	--	--	--
33	SW San Bernardino Valley	62	78	0	17(27.4)	42.3
34	Central San Bernardino Valley 1	60	142	0	31(51.7)	53.5
34	Central San Bernardino Valley 2	57	92	0	24(42.1)	46.0
35	East San Bernardino Valley	60	103	0	12(20.0)	36.2
37	Central San Bernardino Mountains	58	63	0	1(1.7)	26.2
38	East San Bernardino Mountains	--	--	--	--	--
DISTRICT MAXIMUM			142+	0+	71	64.0
SOUTH COAST AIR BASIN			142+	0+	75	64.0

## KEY:

$\mu\text{g}/\text{m}^3$ = micrograms per cubic meter of air	-- = Pollutant not monitored
AAM = Annual Arithmetic Mean	** Salton Sea Air Basin

- f) PM2.5 samples were collected every 3 days at all sites except for the following sites: Station Numbers 060, 072, 077, 087, 3176, and 4144 where samples were taken every day, and Station Number 5818 where samples were taken every 6 days.
- i) U.S. EPA has revised the federal 24-hour PM2.5 standard from 65  $\mu\text{g}/\text{m}^3$  to 35  $\mu\text{g}/\text{m}^3$ ; effective December 17, 2006.



**Table 3-2 (Continued)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

SUSPENDED PARTICULATE MATTER PM2.5 <sup>g)</sup>						
					No. (%) Samples Exceeding Standard	Annual Averages <sup>j)</sup>
Source Receptor Area No.	Location of Air Monitoring Station	No. Days of Data	Max. Conc. ( $\mu\text{g}/\text{m}^3$ , 24- hour)	98 <sup>th</sup> Percentile Conc. in $\mu\text{g}/\text{m}^3$ 24-hr	Federal > 65 $\mu\text{g}/\text{m}^3$ , 24-hour	AAM Conc. ( $\mu\text{g}/\text{m}^3$ )
<b>LOS ANGELES COUNTY</b>						
1	Central Los Angeles	330	56.2	38.9	0	15.6
2	Northwest Coastal Los Angeles Co	--	--	--	--	--
3	Southwest Coastal Los Angeles Co 2	--	--	--	--	--
4	South Coastal Los Angeles Co 1	290*	58.5*	34.9*	0*	14.2*
4	South Coastal Los Angeles County 2	320	53.6	35.3	0	14.5
6	West San Fernando Valley	92	44.1	32.0	0	12.9
7	East San Fernando Valley	104	50.7	43.4	0	16.6
8	West San Gabriel Valley	113	45.9	32.1	0	13.4
9	East San Gabriel Valley 1	278*	52.8*	38.5*	0*	15.5*
9	East San Gabriel Valley 2	--	--	--	--	--
10	Pomona/Walnut Valley	--	--	--	--	--
11	South San Gabriel Valley	116	72.2	43.1	1(0.9)	16.7
12	South Central LA County	107	55.0	44.5	0	16.7
13	Santa Clarita Valley	--	--	--	--	--
<b>ORANGE COUNTY</b>						
16	North Orange County	--	--	--	--	--
17	Central Orange County	330	56.2	40.5	0	14.1
18	North Coastal Orange County	--	--	--	--	--
19	Saddleback Valley	106	47.0	25.7	0	11.0
<b>RIVERSIDE COUNTY</b>						
22	Norco/Corona	--	--	--	--	--
23	Metropolitan Riverside County 1	300	68.5	53.7	1(0.3)	19.0
23	Metropolitan Riverside County 2	105	55.3	47.7	0	17.0
23	Mira Loma	113	63.0	52.5	0	20.6
24	Perris Valley	--	--	--	--	--
25	Lake Elsinore	--	--	--	--	--
29	Banning Airport	--	--	--	--	--
30	Coachella Valley 1**	111	24.8	15.9	0	7.7
30	Coachella Valley 2**	107	24.3	19.1	0	9.5
<b>SAN BERNARDINO COUNTY</b>						
32	Northwest San Bernardino Valley	--	--	--	--	--
33	Southwest San Bernardino Valley	107	53.7	41.5	0	18.5
34	Central San Bernardino Valley1	112	52.6	43.8	0	17.6
34	Central San Bernardino Valley2	102	55.0	48.4	0	17.8
35	East San Bernardino Valley	--	--	--	--	--
37	Central San Bernardino Mountains	--	--	--	--	--
38	East San Bernardino Mountains	42*	40.1*	40.1*	0*	11.2*
<b>DISTRICT MAXIMUM</b>			72.2	53.7	1	20.6
<b>SOUTH COAST AIR BASIN</b>			72.2	53.7	1	20.6

**KEY:**

$\mu\text{g}/\text{m}^3$ = micrograms per cubic meter of air	-- = Pollutant not monitored
AAM = Annual Arithmetic Mean	** Salton Sea Air Basin

g) Total suspended particulates, lead, and sulfate were determined from samples collected every 6 days by the high volume sampler method, on glass fiber filter media.

j) Federal PM2.5 standard is annual average (AAM) > 15  $\mu\text{g}/\text{m}^3$ . State standard is annual average (AAM) > 12  $\mu\text{g}/\text{m}^3$ .

**Table 3-2 (Continued)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

TOTAL SUSPENDED PARTICULATES TSP <sup>h)</sup>				
Source Receptor Area No.	Location of Air Monitoring Station	No. Days of Data	Max. Conc. ( $\mu\text{g}/\text{m}^3$ , 24-hour)	Annual Average AAM Conc. ( $\mu\text{g}/\text{m}^3$ )
<b>LOS ANGELES COUNTY (Co)</b>				
1	Central Los Angeles	59	109	63.3
2	Northwest Coastal Los Angeles Co	56	76	40.2
3	Southwest Coast Los Angeles Co 2	56	84	43.1
4	South Coastal Los Angeles Co 1	62	157	62.9
4	South Coast Los Angeles Co 2	59	192	71.1
6	West San Fernando Valley	--	--	--
7	East San Fernando Valley	--	--	--
8	West San Gabriel Valley	60	123	42.8
9	East San Gabriel Valley 1	59	142	68.4
9	East San Gabriel Valley 2	--	--	--
10	Pomona/Walnut Valley	--	--	--
11	South San Gabriel Valley	58	768	79.3
12	South Central LA County	58	147	68.4
13	Santa Clarita Valley	--	--	--
<b>ORANGE COUNTY</b>				
16	North Orange County	--	--	--
17	Central Orange County	--	--	--
18	North Coastal Orange County	--	--	--
19	Saddleback Valley	--	--	--
<b>RIVERSIDE COUNTY</b>				
22	Norco/Corona	--	--	--
23	Metropolitan Riverside County 1	59	169	91.2
23	Metropolitan Riverside County 2	59	131	72.9
23	Mira Loma	--	--	--
24	Perris Valley	--	--	--
25	Lake Elsinore	--	--	--
29	Banning Airport	--	--	--
30	Coachella Valley 1**	--	--	--
30	Coachella Valley 2**	--	--	--
<b>SAN BERNARDINO COUNTY</b>				
32	NW San Bernardino Valley	58	105	54.6
33	SW San Bernardino Valley	--	--	--
34	Central San Bernardino Valley 1	59	190	101.0
34	Central San Bernardino Valley 2	54	174	87.0
35	East San Bernardino Valley	--	--	--
37	Central San Bernardino Mountains	--	--	--
38	East San Bernardino Mountains	--	--	--
DISTRICT MAXIMUM			768	101.0
SOUTH COAST AIR BASIN			768	101.0

## KEY:

$\mu\text{g}/\text{m}^3$ = micrograms per cubic meter of air	-- = Pollutant not monitored
AAM = Annual Arithmetic Mean	** Salton Sea Air Basin

h) Federal annual PM10 standard (AAM > 50  $\mu\text{g}/\text{m}^3$ ) was revoked effective December 17, 2006. State standard is annual average (AAM) > 20  $\mu\text{g}/\text{m}^3$ .

**Table 3-2 (Concluded)**  
**2006 Air Quality Data – South Coast Air Quality Management District**

Source Receptor Area No.	Location of Air Monitoring Station	LEAD <sup>h)</sup>		SULFATES (SO <sub>x</sub> ) <sup>h)</sup>	
		Max. Monthly Average Conc <sup>k)</sup> (µg/m <sup>3</sup> )	Max. Quarterly Average Conc. <sup>k)</sup> (µg/m <sup>3</sup> )	Max. Conc. (µg/m <sup>3</sup> , 24-hour)	No. (%) Samples Exceeding State Standard ≥ 25 µg/m <sup>3</sup> , 24-hour
<b>LOS ANGELES COUNTY (Co)</b>					
1	Central Los Angeles	0.02	0.01	18.2	0
2	Northwest Coastal Los Angeles Co	--	--	12.2	0
3	Southwest Coastal Los Angeles Co 2	0.01	0.01	13.6	0
4	South Coastal Los Angeles Co 1	0.01	0.01	17.8	0
4	South Coastal Los Angeles Co 2	0.01	0.01	18.8	0
6	West San Fernando Valley	--	--	--	--
7	East San Fernando Valley	--	--	--	--
8	West San Gabriel Valley	--	--	28.7	1(1.7)
9	East San Gabriel Valley 1	--	--	20.8	0
9	East San Gabriel Valley 2	--	--	--	--
10	Pomona/Walnut Valley	--	--	--	--
11	South San Gabriel Valley	0.03	0.02	28.6	1(1.7)
12	South Central LA County	0.02	0.02	24.1	0
13	Santa Clarita Valley	--	--	--	--
<b>ORANGE COUNTY</b>					
16	North Orange County	--	--	--	--
17	Central Orange County	--	--	--	--
18	North Coastal Orange County	--	--	--	--
19	Saddleback Valley	--	--	--	--
<b>RIVERSIDE COUNTY</b>					
22	Norco/Corona	--	--	--	--
23	Metropolitan Riverside County 1	0.01	0.01	10.8	0
23	Metropolitan Riverside County 2	0.01	0.01	9.9	0
23	Mira Loma	--	--	--	--
24	Perris Valley	--	--	--	--
25	Lake Elsinore	--	--	--	--
29	Banning Airport	--	--	--	--
30	Coachella Valley 1**	--	--	--	--
30	Coachella Valley 2**	--	--	--	--
<b>SAN BERNARDINO COUNTY</b>					
32	NW San Bernardino Valley	0.01	0.01	9.1	0
33	SW San Bernardino Valley	--	--	--	--
34	Central San Bernardino Valley 1	--	--	10.3	0
34	Central San Bernardino Valley 2	0.02	0.01	11.0	0
35	East San Bernardino Valley	--	--	--	--
37	Central San Bernardino Mountains	--	--	--	--
38	East San Bernardino Mountains	--	--	--	--
<b>DISTRICT MAXIMUM</b>		<b>0.03</b>	<b>0.02</b>	<b>28.7</b>	<b>1</b>
<b>SOUTH COAST AIR BASIN</b>		<b>0.03</b>	<b>0.02</b>	<b>28.7</b>	<b>1</b>

**KEY:**

µg/m <sup>3</sup> = micrograms per cubic meter of airF	** Salton Sea Air Basin
-- = Pollutant not monitored	

h) Federal annual PM<sub>10</sub> standard (AAM > 50 µg/m<sup>3</sup>) was revoked effective December 17, 2006. State standard is annual average (AAM) > 20 µg/m<sup>3</sup>.

k) Federal lead standard is quarterly average > 1.5 µg/m<sup>3</sup>; and state standard is monthly average > µg/m<sup>3</sup>. No location exceeded lead standards.

## Criteria Pollutants

### Carbon Monoxide

CO is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere, and is produced by both natural processes and human activities. In remote areas far from human habitation, carbon monoxide occurs in the atmosphere at an average background concentration of 0.04 ppm, primarily as a result of natural processes such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is incomplete combustion of carbon-containing fuels, mainly gasoline. In 2002, approximately 98 percent of the CO emitted into the Basin's atmosphere was from mobile sources. Consequently, CO concentrations are generally highest in the vicinity of major concentrations of vehicular traffic.

CO is a primary pollutant, meaning that it is directly emitted into the air, not formed in the atmosphere by chemical reaction of precursors, as is the case with ozone and other secondary pollutants. Ambient concentrations of CO in the Basin exhibit large spatial and temporal variations due to variations in the rate at which CO is emitted and in the meteorological conditions that govern transport and dilution. Unlike ozone, CO tends to reach high concentrations in the fall and winter months. The highest concentrations frequently occur on weekdays at times consistent with rush hour traffic and late night during the coolest, most stable portion of the day.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reductions in birth weight and impaired neurobehavioral development have been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities.

Carbon monoxide concentrations were measured at 25 locations in the Basin and neighboring SSAB areas in 2006. Carbon monoxide concentrations did not exceed the standards in 2006. The highest eight-hour average carbon monoxide concentration recorded (6.4 ppm in the South Central Los Angeles County area) was 71 percent of the federal carbon monoxide standard. The maximum annual average nitrogen dioxide concentration (0.0310 ppm recorded in the Northwest San Bernardino Valley area) was 58 percent of the federal standard. Concentrations of the remaining pollutants remained well below the federal standards.

The 2003 AQMP revisions to the SCAQMD's CO Plan served two purposes: it replaced the 1997 attainment demonstration that lapsed at the end of 2000; and it provided the basis for a CO maintenance plan in the future. In 2004, the SCAQMD formally requested the U.S. EPA to re-designate the Basin from non-attainment to attainment with the CO National Ambient Air Quality Standards. On February 24, 2007, U.S. EPA published in the Federal Registrar its proposed decision to re-designate the Basin from non-attainment to attainment for CO. The comment period on the re-designation proposal closed on March 16, 2007 with no comments received by the U.S. EPA. On May 11, 2007, U.S. EPA published in the Federal Registrar its final decision to approve the SCAQMD's request for re-designation from non-attainment to attainment for CO, effective June 11, 2007.

### Ozone

Ozone (O<sub>3</sub>), a colorless gas with a sharp odor, is a highly reactive form of oxygen. High ozone concentrations exist naturally in the stratosphere. Some mixing of stratospheric ozone downward through the troposphere to the earth's surface does occur; however, the extent of ozone transport is limited. At the earth's surface in sites remote from urban areas ozone concentrations are normally very low (0.03-0.05 ppm).

While ozone is beneficial in the stratosphere because it filters out skin-cancer-causing ultraviolet radiation, it is a highly reactive oxidant. It is this reactivity which accounts for its damaging effects on materials, plants, and human health at the earth's surface.

The propensity of ozone for reacting with organic materials causes it to be damaging to living cells and ambient ozone concentrations in the Basin are frequently sufficient to cause health effects. Ozone enters the human body primarily through the respiratory tract and causes respiratory irritation and discomfort, makes breathing more difficult during exercise, and reduces the respiratory system's ability to remove inhaled particles and fight infection.

Individuals exercising outdoors, children and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for ozone effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities. Elevated ozone levels are also associated with increased school absences.

Ozone exposure under exercising conditions is known to increase the severity of the abovementioned observed responses. Animal studies suggest that exposures to a combination of pollutants which include ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

In 2006, the SCAQMD regularly monitored ozone concentrations at 29 locations in the Basin and SSAB. All areas monitored were below the stage 1 episode level (0.20 ppm), but the maximum concentrations in the Basin exceeded the health advisory level (0.15 ppm).

Maximum ozone concentrations in the SSAB areas monitored by the SCAQMD were lower than in the Basin and were below the health advisory level.

In 2006, the maximum ozone, PM10 and PM2.5 concentrations in the Basin continued to exceed federal standards by wide margins. Maximum one-hour and eight-hour average ozone concentrations were 0.18 ppm and 0.142 ppm (the one-hour was recorded in East San Gabriel Valley and the eight-hour was recorded in Central San Bernardino Mountains area). The eight-hour standard was 178 percent of the federal standards. The federal one-hour standard was revoked and replaced by the eight hour standard on June 15, 2005. Maximum 24-hour average and annual average PM10 concentrations were 142  $\mu\text{g}/\text{m}^3$  recorded in the South Coastal San Bernardino Valley area and 64.0  $\mu\text{g}/\text{m}^3$  recorded in the Mira Loma area. The 24-hour standard was 94 percent of the federal 24-hour. The federal annual average standards were revoked December 17, 2006. Maximum 24-hour average and annual average PM2.5 concentrations (72.2  $\mu\text{g}/\text{m}^3$  recorded in the South Central Los Angeles County area and 20.6  $\mu\text{g}/\text{m}^3$  recorded in the Mira Loma area) were 206 and 137 percent of the federal 24-hour (65  $\mu\text{g}/\text{m}^3$ ) and annual average standards, respectively.

In 1997, the USEPA promulgated a new 8-hour national ambient air quality standard for ozone. Soon thereafter, a court decision ordered that the USEPA could not enforce the new standard until adequate justification for the new standard was provided. The USEPA appealed the decision to the Supreme Court. On February 27, 2001, the Supreme Court upheld USEPA's authority and methods to establish clean air standards. The Supreme Court, however, ordered USEPA to revise its implementation plan for the new ozone standard. The EPA has since adopted the new 8-hour standard. Meanwhile, the California Air Resources Board (CARB) and local air districts continue to collect technical information in order to prepare for an eventual State Implementation Plan (SIP) to reduce unhealthy levels of ozone in areas violating the new federal standard. California has previously developed a SIP for the one-hour ozone standard, which has been approved by USEPA for the South Coast Air Basin.

The objective of the 2007 AQMP is to attain and maintain ambient air quality standards. Based upon the modeling analysis described in the Draft Program Environmental Impact Report for the 2007 AQMP implementation of all control measures contained in the 2007 AQMP is anticipated to bring the district into compliance with the federal eight-hour ozone standard by 2024 and the state eight-hour ozone standard beyond 2024.

### **Nitrogen Dioxide**

NO<sub>2</sub> is a reddish-brown gas with a bleach-like odor. Nitric oxide (NO) is a colorless gas, formed from the nitrogen (N<sub>2</sub>) and oxygen (O<sub>2</sub>) in air under conditions of high temperature and pressure which are generally present during combustion of fuels; NO reacts rapidly with the oxygen in air to form NO<sub>2</sub>. NO<sub>2</sub> is responsible for the brownish tinge of polluted air. The two gases, NO and NO<sub>2</sub>, are referred to collectively as NO<sub>x</sub>. In the presence of sunlight, NO<sub>2</sub> reacts to form nitric oxide and an oxygen atom. The oxygen atom can react further to form ozone, via a complex series of chemical reactions involving hydrocarbons. Nitrogen dioxide may also react to form nitric acid (HNO<sub>3</sub>) which reacts further to form nitrates, components of PM<sub>2.5</sub> and PM<sub>10</sub>.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO<sub>2</sub> at levels found in homes with gas stoves, which are higher than ambient levels found in southern California. Increase in resistance to air flow and airway contraction

is observed after short-term exposure to NO<sub>2</sub> in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. More recent studies have found associations between NO<sub>2</sub> exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms and emergency room asthma visits.

In animals, exposure to levels of NO<sub>2</sub> considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of ozone and NO<sub>2</sub>.

In 2006, nitrogen dioxide concentrations were monitored at 24 locations. No area of the Basin or SSAB exceeded the federal or state standards for nitrogen dioxide. The Basin has not exceeded the federal standard for nitrogen dioxide (0.0534 ppm) since 1991, when the Los Angeles County portion of the Basin recorded the last exceedance of the standard in any U.S. county. The nitrogen dioxide state standard was not exceeded at any SCAQMD monitoring location in 2006. The highest one-hour average concentration recorded (0.14 ppm in South Central Los Angeles) was 56 percent of the state standard. NO<sub>x</sub> emission reductions continue to be necessary because it is a precursor to both ozone and PM (PM<sub>2.5</sub> and PM<sub>10</sub>) concentrations.

### **Sulfur Dioxide**

SO<sub>2</sub> is a colorless gas with a sharp odor. It reacts in the air to form sulfuric acid (H<sub>2</sub>SO<sub>4</sub>), which contributes to acid precipitation, and sulfates, which are components of PM<sub>10</sub> and PM<sub>2.5</sub>. Most of the SO<sub>2</sub> emitted into the atmosphere is produced by burning sulfur-containing fuels.

Exposure of a few minutes to low levels of SO<sub>2</sub> can result in airway constriction in some asthmatics. All asthmatics are sensitive to the effects of SO<sub>2</sub>. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO<sub>2</sub>. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO<sub>2</sub>.

Animal studies suggest that despite SO<sub>2</sub> being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO<sub>2</sub> levels. In these studies, efforts to separate the effects of SO<sub>2</sub> from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

No exceedances of federal or state standards for sulfur dioxide occurred in 2006 at any of the seven SCAQMD locations monitored. Though sulfur dioxide concentrations remain well below the standards, sulfur dioxide is a precursor to sulfate, which is a component of fine particulate matter, PM<sub>10</sub>, and PM<sub>2.5</sub>. Standards for PM<sub>10</sub> and PM<sub>2.5</sub> were both exceeded

in 2006. Sulfur dioxide was not measured at SSAB sites in 2006. Historical measurements showed concentrations to be well below standards and monitoring has been discontinued.

### **Particulate Matter (PM10 and PM2.5)**

Of great concern to public health are the particles small enough to be inhaled into the deepest parts of the lung. Respirable particles (particulate matter less than about 10 micrometers in diameter) can accumulate in the respiratory system and aggravate health problems such as asthma, bronchitis and other lung diseases. Children, the elderly, exercising adults, and those suffering from asthma are especially vulnerable to adverse health effects of PM10 and PM2.5.

A consistent correlation between elevated ambient fine particulate matter (PM10 and PM2.5) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Studies have reported an association between long term exposure to air pollution dominated by fine particles (PM2.5) and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions, to school and kindergarten absences, to a decrease in respiratory function in normal children and to increased medication use in children and adults with asthma. Studies have also shown lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory and/or cardiovascular disease and children appear to be more susceptible to the effects of PM10 and PM2.5.

The SCAQMD monitored PM10 concentrations at 20 locations in 2006. Highest PM10 concentrations were recorded in Riverside and San Bernardino counties in and around the Metropolitan Riverside County area and further inland in San Bernardino Valley areas. The federal 24-hour standard was not exceeded at any of the locations monitored in 2005. The much more stringent state standards were exceeded in most areas.

The SCAQMD began regular monitoring of PM2.5 in 1999 following the U.S. EPA's adoption of the national PM2.5 standards in 1997. In 2005, PM2.5 concentrations were monitored at 19 locations throughout the district. Maximum 24-hour average concentration has increased at some locations compared to 2001, the basis of the 2003 AQMP air quality data. The PM2.5 annual average concentrations and the highest 98th percentile PM2.5 concentrations (which the federal 24-hour PM2.5 standard is based on), however, are lower than 2001 levels at all locations monitored.

Similar to PM10 concentrations, PM2.5 concentrations were higher in the inland valley areas of San Bernardino and Metropolitan Riverside counties. However, PM2.5 concentrations were also high in the metropolitan area of Los Angeles County. The high PM2.5 concentrations in Los Angeles County are mainly due to the secondary formation of smaller particulates resulting from mobile and stationary source activities. In contrast to PM10, PM2.5 concentrations were low in the Coachella Valley area of SSAB. PM10 concentrations are normally higher in the desert areas due to windblown and fugitive dust emissions.



## **Lead**

Lead in the atmosphere is present as a mixture of a number of lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there was a dramatic reduction in atmospheric lead in the Basin over the past two decades.

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures, and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early-age environmental exposure, and elevated blood lead levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland), and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

The federal and state standards for lead were not exceeded in any area of the SCAQMD in 2005. There have been no violations of the standards at the SCAQMD's regular air monitoring stations since 1982, as a result of removal of lead from gasoline. The maximum quarterly average lead concentration ( $0.03 \mu\text{g}/\text{m}^3$ ) was two percent of the federal standard. Additionally, special monitoring stations immediately adjacent to stationary sources of lead (e.g., lead smelting facilities) have not recorded exceedances of the standards in localized areas of the Basin since 1991 and 1994 for the federal and state standards, respectively. The maximum monthly and quarterly average lead concentration ( $0.44 \mu\text{g}/\text{m}^3$  and  $0.34 \mu\text{g}/\text{m}^3$  in Central Los Angeles), measured at special monitoring sites immediately adjacent to stationary sources of lead were 29 and 23 percent of the state and federal standards, respectively. No lead data were obtained at SSAB and Orange County stations in 2005, and because historical lead data showed concentrations in SSAB and Orange County areas to be well below the standard, measurements have been discontinued.

## **Sulfates**

Sulfates are chemical compounds which contain the sulfate ion and are part of the mixture of solid materials which make up PM10. Most of the sulfates in the atmosphere are produced by oxidation of sulfur dioxide. Oxidation of sulfur dioxide yields sulfur trioxide ( $\text{SO}_3$ ) which reacts with water to form sulfuric acid, which contributes to acid deposition. The reaction of sulfuric acid with basic substances such as ammonia yields sulfates, a component of PM10 and PM2.5.

Most of the health effects associated with fine particles and sulfur dioxide at ambient levels are also associated with sulfates. Thus, both mortality and morbidity effects have been observed with an increase in ambient sulfate concentrations. However, efforts to separate the effects of sulfates from the effects of other pollutants have generally not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles such as sulfuric acid aerosol and ammonium bisulfate are more toxic than non-

acidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

In 2005, the state sulfate standard was not exceeded anywhere in the Basin. No sulfate data were obtained at SSAB and Orange County stations in 2005. Historical sulfate data showed concentrations in the SSAB and Orange County areas to be well below the standard, and measurements have been discontinued.

### **Visibility Reducing Particles**

Since deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality, the state of California has adopted a standard for visibility or visual range. Until 1989, the standard was based on visibility estimates made by human observers. The standard was changed to require measurement of visual range using instruments that measure light scattering and absorption by suspended particles.

### **Volatile Organic Compounds**

It should be noted that there are no state or national ambient air quality standards for VOCs because they are not classified as criteria pollutants. VOCs are regulated, however, because limiting VOC emissions reduces the rate of photochemical reactions that contribute to the formation of ozone. They are also transformed into organic aerosols in the atmosphere, contributing to higher PM<sub>10</sub> and lower visibility levels.

Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations of VOCs because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis, even at low concentrations. Some hydrocarbon components classified as VOC emissions are thought or known to be hazardous. Benzene, for example, one hydrocarbon component of VOC emissions, is known to be a human carcinogen.

### **Greenhouse Gases**

The SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the AQMP. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- phase out the use and corresponding emissions of chlorofluorocarbons (CFCs), methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons (HCFCs) by the year 2000;
- develop recycling regulations for HCFCs;
- develop an emissions inventory and control strategy for methyl bromide; and,
- support the adoption of a California greenhouse gas emission reduction goal.

Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs), comparable to a greenhouse. GHGs are emitted by natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. Global warming is the observed increase in average temperature of the earth's surface and

atmosphere. The primary cause of global warming is an increase of GHGs in the atmosphere. The six major GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs), and perfluorocarbon (PFCs). The GHGs absorb longwave radiant energy emitted by the Earth, which warms the atmosphere. The GHGs also emit longwave radiation both upward to space and back down toward the surface of the Earth. The downward part of this longwave radiation emitted by the atmosphere is known as the "greenhouse effect." Emissions from human activities such as electricity production and vehicles have elevated the concentration of these gases in the atmosphere.

CO<sub>2</sub> is an odorless, colorless natural greenhouse gas. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO<sub>2</sub> are from burning coal, oil, natural gas, and wood. CH<sub>4</sub> is a flammable gas and is the main component of natural gas. N<sub>2</sub>O, also known as laughing gas, is a colorless greenhouse gas. Some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (whose production was stopped as required by the Montreal Protocol) for automobile air conditioners and refrigerants. The two main sources of PFCs are primary aluminum production and semiconductor manufacture. SF<sub>6</sub> is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF<sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Scientific consensus, as reflected in recent reports issued by the United Nations Intergovernmental Panel on Climate Change, is that the majority of the observed warming over the last 50 years can be attributable to increased concentration of GHGs in the atmosphere due to human activities. Industrial activities, particularly increased consumption of fossil fuels (e.g., gasoline, diesel, wood, coal, etc.), have heavily contributed to the increase in atmospheric levels of GHGs. As reported by the California Energy Commission (CEC), California contributes 1.4 percent of the global and 6.2 percent of the national GHGs emissions (CEC, 2004). The GHG inventory for California is presented in Table 3-3 (CEC, 2005). Approximately 80 percent of GHGs in California are from fossil fuel combustion (see Table 3-3).

In June 2005, Governor Schwarzenegger signed Executive Order #S-3-05 which established the following greenhouse gas reduction targets:

- By 2010, Reduce to 2000 Emission Levels,
- By 2020, Reduce to 1990 Emission Levels, and
- By 2050, Reduce to 80 percent below 1990 Levels.

**Table 3-3**  
**California GHG Emissions and Sinks Summary**  
**(Million metric tons of CO<sub>2</sub> equivalence)**

<b>Gas/Source</b>	<b>1990</b>	<b>2004</b>
<b>Carbon Dioxide (Gross)</b>	<b>317.4</b>	<b>355.9</b>
Fossil Fuel Combustion	306.4	342.4
Residential	29.0	27.9
Commercial	12.6	12.2
Industrial	66.1	67.1
Transportation	161.1	188.0
Electricity Generation (In State)	36.5	47.1
No End Use Specified	1.1	0.2
Cement Production	4.6	6.5
Lime Production	0.2	0.1
Limestone & Dolomite Consumption	0.2	0.3
Soda Ash Consumption	0.2	0.2
Carbon Dioxide Consumption	0.1	0.1
Waste Combustion	0.1	0.1
Land Use Change & Forestry Emissions	5.5	6.1
Land Use Change & Forestry Sinks	(22.7)	(21.0)
<b>Carbon Dioxide (Net)</b>	<b>294.7</b>	<b>334.9</b>
<b>Methane (CH<sub>4</sub>)</b>	<b>26.0</b>	<b>27.9</b>
Petroleum & Natural Gas Supply System	1.0	0.5
Natural Gas Supply System	1.6	1.4
Landfills	8.1	8.4
Enteric Fermentation	7.5	7.2
Manure Management	3.3	6.0
Flooded Rice Fields	0.4	0.6
Burning Ag & Other Residues	0.1	0.1
Wastewater Treatment	1.4	1.7
Mobile Source Combustion	1.2	0.6
Stationary Source Combustion	1.3	1.3
<b>Nitrous Oxide (N<sub>2</sub>O)</b>	<b>32.7</b>	<b>33.3</b>
Nitric Acid Production	0.4	0.2
Waste Combustion	0.0	0.0
Agricultural Soil Management	14.7	19.2
Manure Management	0.8	0.9
Burning Ag Residues	0.1	0.1
Wastewater	0.9	1.1
Mobile Source Combustion	15.6	11.8
Stationary Source Combustion	0.2	0.2
<b>High Global Warming Potential Gases (HFCs, PFCs &amp; SF<sub>6</sub>)</b>	<b>7.1</b>	<b>14.2</b>
Substitution of Ozone-Depleting Substances	4.5	12.6
Semiconductor Manufacture	0.4	0.6
Electricity Transmission & Distribution (SF <sub>6</sub> )	2.3	1.0
<b>Gross California Emissions (w/o Electric Imports)</b>	<b>383.3</b>	<b>431.3</b>
<b>Land Use Change &amp; Forestry Sinks</b>	<b>(22.7)</b>	<b>(21.0)</b>
<b>Net Emissions (w/o Electric Imports)</b>	<b>360.6</b>	<b>410.3</b>
<b>Electricity Imports</b>	<b>43.3</b>	<b>60.8</b>
<b>Gross California Emissions with Electricity Imports</b>	<b>426.6</b>	<b>492.1</b>
<b>Net California Emissions with Electricity Imports</b>	<b>403.9</b>	<b>471.1</b>

Source: CEC, 2005

On September 27, 2006, Assembly Bill (AB) 32, the California Global Warming Solutions Act, of 2006 was enacted by the State of California and signed by Governor Schwarzenegger. AB32 expanded on Executive Order #S-3-05. The legislature stated that “global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California.” AB32 represents the first enforceable state-wide program in the U.S. to cap all GHG emissions from major industries that includes penalties for non-compliance. While acknowledging that national and international actions will be necessary to fully address the issue of global warming, AB32 lays out a program to inventory and reduce greenhouse gas emissions in California and from power generation facilities located outside the state that serve California residents and businesses.

AB32 will require CARB to:

- Establish a statewide GHG emissions cap for 2020, based on 1990 emissions by January 1, 2008;
- Adopt mandatory reporting rules for significant sources of GHG by January 1, 2008;
- Adopt an emissions reduction plan by January 1, 2009, indicating how emissions reductions will be achieved via regulations, market mechanisms, and other actions; and
- Adopt regulations to achieve the maximum technologically feasible and cost-effective reductions of GHG by January 1, 2011.

The combination of Executive Order #S-3-05 and AB32 will require significant development and implementation of energy efficient technologies and shifting of energy production to renewable sources.

### **Climate Change**

Global climate change is a change in the average weather of the earth, which can be measured by wind patterns, storms, precipitation, and temperature. Historical records have shown that temperature changes have occurred in the past, such as during previous ice ages. Some data indicate that the current temperature record differs from previous climate changes in rate and magnitude.

The United Nations Intergovernmental Panel on Climate Change constructed several emission trajectories of greenhouse gases needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of greenhouse gases at 400-450 ppm carbon dioxide-equivalent concentration is required to keep global mean warming below 2° Celsius, which is assumed to be necessary to avoid dangerous climate change.

The potential health effects from global climate change may arise from temperature increases, climate-sensitive diseases, extreme events, and air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems (i.e., heat rash and heat stroke). In addition, climate sensitive diseases may increase, such as those spread by mosquitoes and other disease carrying insects. Those diseases include malaria, dengue fever, yellow fever, and encephalitis. Extreme events such as flooding and hurricanes can displace people and agriculture, which would have negative consequences. Drought in some areas may increase, which would decrease water and food availability. Global warming may also contribute to air quality problems from increased frequency of smog and particulate air pollution.

The impacts of climate change will also affect projects in various ways. Effects of climate change are specifically mentioned in AB 32 such as rising sea levels and changes in snow pack. The extent of climate change impacts at specific locations remains unclear. However, it is expected that California agencies will more precisely quantify impacts in various regions of the State. As an example, it is expected that the Department of Water Resources will formalize a list of foreseeable water quality issues associated with various degrees of climate change. Once state government agencies make these lists available, they could be used to more precisely determine to what extent a project creates global climate change impacts.

### **Toxic Air Contaminants**

Historically, the SCAQMD has regulated criteria air pollutants using either a technology-based or an emissions limit approach. The technology-based approach defines specific control technologies that may be installed to reduce pollutant emissions. The emission limit approach establishes an emission limit, and allows industry to use any emission control equipment, as long as the emission requirements are met. The regulation of toxic air contaminants (TACs) requires a similar regulatory approach as explained in the following subsections.

#### **Control of TACs under the TAC Identification and Control Program**

California's TAC identification and control program, adopted in 1983 as Assembly Bill (AB) 1807, is a two-step program in which substances are identified as TACs, and airborne toxic control measures (ATCMs) are adopted to control emissions from specific sources. CARB has adopted a regulation designating all 188 federal hazardous air pollutants (HAPs) as TACs.

ATCMs are developed by CARB and implemented by the SCAQMD and other air districts through the adoption of regulations of equal or greater stringency. Generally, the ATCMs reduce emissions to achieve exposure levels below a determined health threshold. If no such threshold levels are determined, emissions are reduced to the lowest level achievable through the best available control technology unless it is determined that an alternative level of emission reduction is adequate to protect public health.

Under California state law, a federal National Emission Standard for Hazardous Air Pollutants (NESHAP) automatically becomes a state ATCM, unless CARB has already adopted an ATCM for the source category. Once a NESHAP becomes an ATCM, CARB and the air pollution control or air quality management district have certain responsibilities related to adoption or implementation and enforcement of the NESHAP/ATCM.

#### **Control of TACs under the Air Toxics "Hot Spots" Act**

The Air Toxics Hot Spots Information and Assessment Act of 1987 (AB2588) establishes a state-wide program to inventory and assess the risks from facilities that emit TACs and to notify the public about significant health risks associated with the emissions. Facilities are phased into the AB2588 program based on their emissions of criteria pollutants or their occurrence on lists of toxic emitters compiled by the SCAQMD. Phase I consists of facilities that emit over 25 tons per year of any criteria pollutant and facilities present on the SCAQMD's toxics list. Phase I facilities entered the program by reporting their air TAC emissions for calendar year 1989. Phase II consists of facilities that emit between 10 and 25 tons per year of any criteria pollutant, and submitted air toxic inventory reports for calendar year 1990 emissions. Phase III consists of certain designated types of facilities which emit

less than 10 tons per year of any criteria pollutant, and submitted inventory reports for calendar year 1991 emissions. Inventory reports are required to be updated every four years under the state law.

In October 1992, the SCAQMD Governing Board adopted public notification procedures for Phase I and II facilities. These procedures specify that AB2588 facilities must provide public notice when exceeding the following risk levels:

- Maximum Individual Cancer Risk: greater than 10 in 1 million ( $10 \times 10^{-6}$ )
- Total Hazard Index: greater than 1.0 for TACs except lead, or  $> 0.5$  for lead

Public notice is to be provided by letters mailed to all addresses and all parents of children attending school in the impacted area. In addition, facilities must hold a public meeting and provide copies of the facility risk assessment in all school libraries and a public library in the impacted area.

The SCAQMD continues to complete its review of the health risk assessments submitted to date and may require revision and resubmission as appropriate before final approval. Notification will be required from facilities with a significant risk under the AB2588 program based on their initial approved health risk assessments and will continue on an ongoing basis as additional and subsequent health risk assessments are reviewed and approved.

#### **Control of TACs with Risk Reduction Audits and Plans**

Senate Bill (SB) 1731, enacted in 1992 and codified at Health and Safety Code §44390 et seq., amended AB2588 to include a requirement for facilities with significant risks to prepare and implement a risk reduction plan which will reduce the risk below a defined significant risk level within specified time limits. SCAQMD Rule 1402 - Control of Toxic Air Contaminants from Existing Sources, was adopted on April 8, 1994, to implement the requirements of SB1731.

In addition to the TAC rules adopted by SCAQMD under authority of AB1807 and SB1731, the SCAQMD has adopted source-specific TAC rules, based on the specific level of TAC emitted and the needs of the area. These rules are similar to the state's ATCMs because they are source-specific and only address emissions and risk from specific compounds and operations.

#### **Cancer Risks from Toxic Air Contaminants**

New and modified sources of toxic air contaminants in the SCAQMD are subject to Rule 1401 - New Source Review of Toxic Air Contaminants and Rule 212 - Standards for Approving Permits. Rule 212 requires notification of the SCAQMD's intent to grant a permit to construct a significant project, defined as a new or modified permit unit located within 1000 feet of a school (a state law requirement under AB3205), a new or modified permit unit posing an maximum individual cancer risk of one in one million ( $1 \times 10^{-6}$ ) or greater, or a new or modified facility with criteria pollutant emissions exceeding specified daily maximums. Distribution of notice is required to all addresses within a 1/4-mile radius, or other area deemed appropriate by the SCAQMD. Rule 1401 currently controls emissions of carcinogenic and non-carcinogenic (health effects other than cancer) air contaminants from new, modified and relocated sources by specifying limits on cancer risk and hazard index (explained further below), respectively.

### **Health Effects**

One of the primary health risks of concern due to exposure to TACs is the risk of contracting cancer. The carcinogenic potential of TACs is a particular public health concern because it is currently believed by many scientists that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of causing cancer. It is currently estimated that about one in four deaths in the United States is attributable to cancer. About two percent of cancer deaths in the United States may be attributable to environmental pollution (Doll and Peto 1981). The proportion of cancer deaths attributable to air pollution has not been estimated using epidemiological methods.

### **Non-Cancer Health Risks from Toxic Air Contaminants**

Unlike carcinogens, for most noncarcinogens it is believed that there is a threshold level of exposure to the compound below which it will not pose a health risk. The California Environmental Protection Agency (CalEPA) Office of Environmental Health Hazard Assessment develops Reference Exposure Levels (RELs) for TACs which are health-conservative estimates of the levels of exposure at or below which health effects are not expected. The noncancer health risk due to exposure to a TAC is assessed by comparing the estimated level of exposure to the REL. The comparison is expressed as the ratio of the estimated exposure level to the REL, called the hazard index (HI).

### **Existing Emissions from Rule 1110.2 Engines**

SCAQMD staff conducted a survey in 2005 of non-agricultural, stationary, non-emergency engines. Operators at a total of 580 facilities were contacted, and 313 of those facility operators responded (54 percent facility response rate). The survey collected data for 631 out of a total of 907 active engines (70 percent response rate based on number of engines). Emissions were calculated based on fuel consumption data gathered via the survey, but because source test emissions data often underestimate actual emissions, Rule 1110.2 concentration limits were used for some of the engines to make the estimates more realistic. The resulting calculated total emissions for all survey engines were scaled up to account for the percent response rate by engine category to obtain a complete emissions inventory for the entire universe of regulated engines.

### **Unannounced Compliance Testing**

A program of unannounced compliance testing conducted by SCAQMD's Compliance Division revealed that, although engines can generally meet emission limits when emission control systems are properly maintained and adjusted as is generally the case at the time of source testing; emissions during normal operation frequently exceed the emission limits. The tendency for an engine to have excess emissions will differ depending upon whether it is a rich-burn or lean-burn engine, what emission limits it must meet, BACT or Rule 1110.2, and whether or not it has a CEMS. Newer engines would have been subject to more stringent BACT requirements than the source-specific requirements in Rule 1110.2. Table 3-4 shows the average ratio of measured emissions to allowed emissions found in the testing program with engines categorized based on these three parameters.



**Table 3-4**  
**Average Ratio of Measured Emission to Allowed Emission Found in Unannounced Testing**

Rich/Lean	Limits	CEMS	Tests	NO <sub>x</sub>	CO
Lean	BACT	No	3	1.81	0.33
Lean	BACT	Yes	7	0.76	0.39
Lean	Rule	No	1	0.89	0.10
Rich	BACT	No	169	5.19	5.21
Rich	BACT	Yes	8	0.11	37.76
Rich	Rule	No	39	2.12	0.70

In 1993 the SCAQMD adopted Regulation XX – RECLAIM. This regulation established a NO<sub>x</sub> and SO<sub>x</sub> cap-and-trade emission reduction market program that required over 300 of the largest emitting facilities in the district to meet the requirements of that program rather than the requirements of specified source-specific SCAQMD Rules. Therefore, while some engines in the district are not subject to the NO<sub>x</sub> requirements of Rule 1110.2; they are still subject to the VOC and CO requirements of Rule 1110.2.

Excess emissions of both NO<sub>x</sub> and CO were clearly evident from rich-burn engines with BACT limits not having CEMS. Excess emissions of CO were evident from rich-burn engines with BACT limits having CEMS and of NO<sub>x</sub> from rich-burn engines with Rule 1110.2 limits not having CEMS. Although there was some suggestion of excess NO<sub>x</sub> emissions from lean-burn engines with BACT limits not having CEMS, the number of tests was considered too small to be conclusive and, because of the inherently low emissions of this type of engine, lean-burn engines are less likely to have large exceedances. There were no tests on rich-burn engines with Rule 1110.2 limits having CEMS.

To estimate the extent of excess emissions from the entire population of engines in the district (actual emissions), staff applied factors to the allowed emission rates from each engine for which survey data were available. These factors were based on the ratios derived from the results of unannounced testing summarized in Table 3-4. Since VOC emissions were not measured, to estimate excess VOC emissions from each engine, the same CO factor was also applied to the allowed VOC emission rates based on the general observation that these pollutants generally trend together, i.e., rise or fall in the same direction.

Table 3-5 summarizes the calculated emissions based on the survey data, the estimated excess emissions based on the average exceedance factors found in compliance testing and the resulting total calculated/estimated emissions from stationary, non-emergency engines.

**Table 3-5**  
**Emissions from Stationary, Non-Emergency Engines**

Description	NO <sub>x</sub>	CO	VOC	SO <sub>x</sub>	PM-2.5	CO <sub>2</sub>
Annual, tons/year	1,678	9,947	459	101	160	1,249,971
Daily, pounds/day	9,195	54,506	2,517	551	877	6,849,158

## ENERGY

In 2005, 37 percent of the petroleum came from in-state, with 21 percent coming from Alaska, and 42 percent being supplied by foreign sources. Also in 2005, 78 percent of the electricity came from instate sources, while 22 percent was imported into the state. The

electricity imported totaled 62,456 gigawatt hours (gW-hours), with 20,286 gW-hours coming from the Pacific Northwest, 42,170 gW-hours from the Southwest. (Note: A gigawatt is equal to one million kilowatts). For natural gas in 2005, 38 percent came from the Southwest, 23 percent from Canada, 15 percent from in-state, and 24 percent from the Rockies.<sup>12</sup>

### **Electricity Production**

Assembly Bill 1890, which was signed into law in 1996, attempted to restructure California's electricity market. Flaws in the market design combined with natural gas supply shortages and a number of other factors to produce an energy crisis in the state that resulted in numerous rolling blackouts, huge electricity price spikes, and bankruptcy or near-bankruptcy for two of the state's private utilities. The legislature responded by rescinding much of the deregulation scheme, creating a new state power authority, and enacting emergency energy conservation measures, mostly in the form of rebates and incentives. Currently, it is not clear whether lawmakers will choose to try again with a restructured market, or return to the former regulated market. This uncertainty has deterred many private investors from pursuing energy projects, meaning that the state, and the region's, future energy supply is far from assured.

Power plants in California provide approximately 85 percent of the in-state electricity demand. Hydroelectric power from the Pacific Northwest provides another 2.6 percent, down due to drought conditions in recent years, and power plants in the Southwestern U.S. provide another 13 percent. The relative contribution of in-state and out-of-state power plants depends upon, among other factors, the precipitation that occurred in the previous year and the corresponding amount of hydroelectric power that is available. Two of the largest power plants in California are located in southern California: Alamitos and Redondo Beach. Both of these plants consume natural gas. San Onofre, the state's largest power plant in terms of net capability, is nuclear powered and is located in San Diego County.

Local electricity distribution service is provided to customers within southern California by one of two privately owned utilities – either Southern California Edison Company or San Diego-based Sempra Energy – or by a publicly-owned utility, such as the Los Angeles Department of Water and Power and the Imperial Irrigation District.

Southern California Edison is the largest electricity utility in southern California with a service area that covers all or nearly all of Orange, San Bernardino, and Ventura counties, and most of Los Angeles and Riverside counties. Southern California Edison Company provides approximately 70 percent of the total electricity demand in southern California. Sempra Energy provides local distribution service to the southern portion of Orange County.

The Los Angeles Department of Water and Power is the largest of the publicly owned electric utilities in southern California. Los Angeles Department of Water and Power provides electricity service to most customers located in the City of Los Angeles and provides approximately 20 percent of the total electricity demand in the Basin. Other cities that operate their own electric utilities in southern California include Burbank, Glendale, Pasadena, Azusa, Vernon, Anaheim, Riverside, Banning, and Colton. Two water districts provide local electric service within the southern California: Imperial Irrigation District and Southern California Water Company. Imperial Irrigation District provides electricity to

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<sup>12</sup> CEC, California's Major Source of Energy, December 2005.

customers in Imperial County and the Coachella Valley portion of Riverside County. Southern California Water Company provides electric service to the community of Big Bear. Anza Electric Cooperative provides local distribution service to the Anza Valley area of southern Riverside County.<sup>13</sup>

Table 3-6 shows the amount of electricity delivered to residential and nonresidential entities in the counties in the Basin.

**Table 3-6  
California Utility Electricity Deliveries for 2000**

County	Residential		Non-residential		Total	
	Number of Accounts	kWh <sup>1</sup> (million)	Number of Accounts	kWh (million)	Number of Accounts	kWh (million)
Los Angeles	2,956,616	18,342	356,167	45,577	3,312,783	63,919
Orange	878,934	6,092	120,907	13,612	999,841	19,704
Riverside	500,171	4,396	157,503	6,425	657,674	10,821
San Bernardino	547,654	3,774	67,131	8,093	914,785	11,867
Total	4,883,375	32,604	701,708	73,707	5,885,083	106,311

California Energy Commission, California Gross System Electricity Production for 2005, December 2005.

<sup>1</sup> kilowatt-hour (kWh): The most commonly-used unit of measure telling the amount of electricity consumed over time. It means one kilowatt (1000 watts) of electricity supplied for one hour.

### Natural Gas

Four regions supply California with natural gas. Three of them—the Southwestern U.S., the Rocky Mountains, and Canada—supplied 87 percent of all the natural gas consumed in California in 2004. The remainder is produced in California. In 2004, approximately 50 percent of all the natural gas consumed in California was used to generate electricity. Residential consumption represented approximately 22 percent of California's natural gas use with the balance consumed by the industrial, resource extraction, and commercial sectors.

Southern California Gas Company, a privately-owned utility company, provides natural gas service throughout the district, except for the City of Long Beach, the southern portion of Orange County, and portions of San Bernardino County. The service area for the Long Beach Gas & Electric Department, a municipal utility owned and operated by the City of Long Beach, includes the cities of Long Beach and Signal Hill, and sections of surrounding communities, including Lakewood, Bellflower, Compton, Seal Beach, Paramount, and Los Alamitos. San Diego Gas & Electric Company provides natural gas service to the southern portion of Orange County. In San Bernardino County, Southwest Gas Corporation provides natural gas service to Victorville, Big Bear, Barstow, and Needles.<sup>14</sup>

Table 3-7 provides the estimated use of natural gas in California by residential, commercial and industrial sectors. In 2005, about 67 percent of the natural gas consumed in California was for industrial and electric generation purposes.

<sup>13</sup> SCAG, 2005 Regional Transportation Plan Program Environmental Report. January 2005

<sup>14</sup> SCAG, 2005 Regional Transportation Plan Program Environmental Report. January 2005 and CEC, 2004 Natural Gas Use in California.

**Table 3-7**  
**California Natural Gas Demand 2005**  
**(Million Cubic Feet per Day – MMcf/day)**

<b>Sector</b>	<b>Utility</b>	<b>Non-Utility</b>	<b>Total</b>
Residential	1,286	--	1,286
Commercial	567	--	567
Industrial	844	630	1,474
Electric Generation	1,711	683	2,394
<b>Total</b>	<b>4,419</b>	<b>1,313</b>	<b>5,732</b>

Source: CEC, California Natural Gas Demand -2005, 2006.

### **Liquid Petroleum Fuels**

California is currently ranked fourth in the nation among oil producing states, behind Louisiana, Texas, and Alaska, respectively. Crude oil production in California averaged 731,150 barrels per day in 2004, a decline of 4.7 percent from 2003. Statewide oil production has declined to levels not seen since 1943. In 2005, the total receipts to refineries of roughly 674 million barrels came from in-state oil production (39.4 percent), combined with oil from Alaska (20.1 percent), and foreign sources (40.4 percent).<sup>15</sup>

California is a major refining center for West Coast petroleum markets with combined crude oil distillation capacity totaling more than 1.9 million barrels per day, ranking the state third highest in the nation. California ranks first in the U.S. in gasoline consumption and second in jet fuel consumption.

A large network of crude oil pipelines connects producing areas with refineries that are located in the San Francisco Bay area, Los Angeles area and the Central Valley. Major ports in northern and southern California receive Alaska North Slope and foreign crude oil for processing in many of the state's 21 refineries.

Most gasoline and diesel fuel sold in California for on-road motor vehicles is refined in California to meet state-specific formulations required by CARB. Major petroleum refineries in California are concentrated in three counties: Contra Costa County in northern California, Kern County in central California, and Los Angeles County in southern California. In Los Angeles County, petroleum refineries are located mostly in the southern portion of the county.<sup>16</sup>

In 2001, refineries in California processed approximately 655 million barrels of crude oil. Almost half of the crude oil came from in-state oil production facilities; 21 percent came from Alaska; and the remaining (approximately 29 percent) came from foreign sources. The long-term oil supply outlook for California remains one of declining in-state and Alaska supplies leading to increasing dependence on foreign oil sources.<sup>16</sup>

### **California's Renewable Energy Program**

California's Renewable Portfolio Standard (RPS) was developed under Senate Bills 1038, 1078, 1250 and 107. The senate bills require retail sellers of electricity to increase the

<sup>15</sup> CEC, Oil and Petroleum in California, December 2006.

<sup>16</sup> SCAG, 2005 Regional Transportation Plan Program Environmental Report. January 2005 and CEC, 2004 Natural Gas Use in California.

amount of renewable energy they procure by one percent each year until 20 percent of total retail sales are served with renewable energy by December 31, 2010.

The Energy Commission's 2003 Integrated Energy Policy Report recommended accelerating that goal to 2010, and the 2004 Energy Report Update further recommended increasing the target to 33 percent by 2020. The state's Energy Action Plan supported this goal.

On April 25, 2006, Governor Schwarzenegger signed Executive Order S-06-06. The Executive Order established targets for the production and use of biofuels and biopower, and directed state agencies with important biomass connections to work together to advance biomass programs in California, while providing environmental protection and mitigation. The Executive Order S-06-06 targets 20 percent biofuel by 2010, 40 percent by 2020 and 75 by 2050. Governor Schwarzenegger targeted biomass to contribute 20 percent of the goal for renewable electricity generated under RPS for the 2012 and 2020 goals.

The CEC's Renewable Energy Program (REP) provides funding for renewable facilities as long as 25 percent of the total energy input was comprised of energy from fossil fuels during a calendar year. Any facility that is developed and awarded a power purchase contract as a result of an Interim RPS procurement solicitation approved by the CPUC under Decisions 02-08-071 and 02-10-062 may use up to 25 percent fossil fuel and attribute 100 percent of the electricity generated as RPS-eligible.<sup>17</sup>

In 2002, the total electrical generation capacity from existing landfill gas to electricity projects in California was 211 MW. At that time there were 26 planned landfill gas to energy facilities with a potential of 39 MW. Approximately 45 MW of electrical potential was projected if existing landfill gas to energy projects were expanded to full capacity. Approximately 163 MW was estimated to be available from landfills that did not generate electricity at the time.

The CEC Reconciliation of Retailer Claims, Commission Report presents a table of the 2005 Gross System Power by fuel type. The table is reproduced here as Table 3-8.

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<sup>17</sup> California Energy Commission, Renewable Portfolio Standard Eligibility, Second Edition, CEC-300-2007-006-CMF, March 2007.

**Table 3-8**  
**2005 Gross System Power<sup>18</sup>**

<b>Fuel Type</b>	<b>System Power</b>
Eligible Renewable	10.7%
-Biomass & waste	2.1%
-Geothermal	5.0%
-Small hydroelectric	1.9%
-Solar	0.2%
-Wind	1.5%
Coal	20.1%
Large hydroelectric	17.0%
Natural gas	37.7%
Nuclear	14.5%
Other	0.0%
Total	100.00%

Table 3-9 shows the percentage of system power by renewable fuel type based on the values in Table 3-8. As seen in Table 3-9, biomass and waste comprises 20 percent of the eligible renewable energy.

**Table 3-9**  
**2005 Renewable System Power**

<b>Fuel Type</b>	<b>System Power</b>
Biomass & waste	20%
Geothermal	47%
Small hydroelectric	18%
Solar	2%
Wind	14%
Total	100%

The RPS has consists of three utilities: Pacific Gas and Electric, Southern California Edison, and San Diego Gas and Electric. SCE provides most of the electricity for the district. Table 3-10 shows that of the total renewable energy procurement SCE provides 66 percent of the state biogas and no municipal solid waste to the RPS. Table 3-11 shows that of the total renewable energy procurement SDG&E provides 20 percent of the state biogas and no municipal solid waste to the RPS.

<sup>18</sup> California Energy Commission, Reconciliation of Retailer Claims, Commission Report, CEC-300-2006-016-F, October 2006.

**Table 3-10**  
**2005 SCE Renewable System Power<sup>19</sup>**

<b>Fuel</b>	<b>Total Procurement (MW-hour)</b>	<b>SCE Procurement (MW-hour)</b>	<b>Percent of SCE Procurement</b>	<b>Percent of Total Procurement</b>
Biomass	3,614,079	379,119	3%	10%
Biogas	1,110,233	737,262	6%	66%
Geothermal	9,504,152	7,823,442	61%	82%
Municipal Solid Waste	139,882	0	0%	0%
Small Hydro	3,743,740	867,171	7%	23%
Solar	622,100	622,100	5%	100%
Wind	3,665,933	2,495,301	19%	68%
Various From Net Metering	0	0	0%	
<b>Total Renewable Procurement</b>	<b>22,400,119</b>	<b>12,924,395</b>	<b>100%</b>	<b>58%</b>

**Table 3-11**  
**2005 SDG&E Renewable System Power<sup>20</sup>**

<b>Fuel</b>	<b>Total Procurement (MW-hour)</b>	<b>SDG&amp;E Procurement (MW-hour)</b>	<b>Percent of SDG&amp;E Procurement</b>	<b>SDG&amp;E Percent of Total Procurement</b>
Biomass	3,614,079	298,945	36%	8%
Biogas	1,110,233	218,223	26%	20%
Geothermal	9,504,152	0	0%	0%
Municipal Solid Waste	139,882	0	0%	0%
Small Hydro	3,743,740	11,764	1%	0%
Solar	622,100	0	0%	0%
Wind	3,665,933	296,434	36%	8%
Various From Net Metering	0	0	0%	
<b>Total Renewable Procurement</b>	<b>22,400,119</b>	<b>825,366</b>	<b>100%</b>	<b>4%</b>

In-state electricity from biomass comprises two percent of the total electricity capacity in California and more than two percent to its electrical energy supply. In Executive Order S-06-06 Governor Schwarzenegger targeted biomass to contribute 20 percent of the goal for renewable electricity generated under RPS. Table 3-12 presents biomass capacities for California.

The CEC states that 305 MW are available from landfill gas operations and 68 MW from digester gas operations in California. Based on 974 MW of total biomass electrical capacity in the state landfill gas operations could provide 31 percent of the total potential biomass electrical capacity and digester operations could provide 38 percent of the total potential biomass electrical capacity. The total potential biomass electrical capacity is the amount of electricity available from all existing and future biomass sources. The term “potential” is used because not all of the sources may be converted to electricity producing sources.

<sup>19</sup> California Energy Commission, Renewable Portfolio Standard 2005 Procurement Verification, Staff Draft Report, CEC-300-2007-001-SD, March 2007

<sup>20</sup> CEC, March 2007, *ibid.*

**Table 3-12  
Biomass Capacities**

Facility Type	Total State MW Capacity <sup>21</sup>	Existing State MW Capacity <sup>22</sup>	Existing SCAB MW Capacity <sup>23</sup>
Direct Combustion	602		
Landfill Gas	305	244	143.9
Wastewater	65	46.810	26.490
Animal Food Waste	3	3	1.660

## HAZARDS AND HAZARDOUS MATERIALS

The reduction of NO<sub>x</sub> emissions pursuant to the proposed amendments to PAR 1110.2 may affect the use, storage and transport of hazards and hazardous materials. New (or modifications to existing) air pollution control equipment (e.g., SCRs) and related components are expected to be installed at some of the affected facilities such that their operations may increase the quantity of hazardous materials (e.g., spent catalyst modules) generated by the control equipment and may increase the quantity of ammonia used. The primary effects of the proposed amendments to PAR 1110.2 with respect to hazards and hazardous materials are the anticipated overall increase in the amount of ammonia injected into SCR units for controlling NO<sub>x</sub> emissions from ICEs, the increase of ammonia slip emissions, and the increase of spent catalyst.

Ammonia is the primary hazardous chemical identified with the proposed project. Ammonia, though not a carcinogen, can have chronic and acute health impacts. Therefore, an increase in the use of ammonia in response to the proposed project may increase the current existing risk setting associated with deliveries (i.e., truck and road accidents) and onsite or offsite spills for each of the facilities that currently use or will begin to use ammonia. Exposure to a toxic gas cloud is the potential hazard associated with this type of control equipment. A toxic gas cloud is the release of a volatile chemical such as anhydrous ammonia that could form a cloud and migrate off-site, thus exposing individuals. Anhydrous ammonia is heavier than air such that when released into the atmosphere, would form a cloud at ground level rather than be dispersed. "Worst-case" conditions tend to arise when very low wind speeds coincide with the accidental release, which can allow the chemicals to accumulate rather than disperse. Though there are facilities that may be affected by the proposed rule amendments and that are currently permitted to use anhydrous ammonia, for new construction, however, current SCAQMD policy no longer allows the use of anhydrous ammonia. Instead, to minimize the hazards associated with ammonia used in the SCR process, aqueous ammonia, 19 percent by volume, is typically required as a permit condition associated with the installation of SCR equipment for the following reasons: 1) 19 percent aqueous ammonia does not travel as a dense gas like anhydrous ammonia; and, 2) 19 percent aqueous ammonia is not on any acutely hazardous material lists unlike anhydrous ammonia or aqueous ammonia at higher percentages.

In addition, the shipping, handling, storage, and disposal of hazardous materials inherently poses a certain risk of a release to the environment. Thus, the routine transport of hazardous

<sup>21</sup> CEC, A Preliminary Roadmap for the Development of Biomass in California CEC 5000-2006-095-D, Dec 2006.

<sup>22</sup> California Biomass Collaborative, California Biomass Facilities Reporting System (BFRS), [http://biomass.ucdavis.edu/pages/report\\_system.htm](http://biomass.ucdavis.edu/pages/report_system.htm), June 2007.

<sup>23</sup> California Biomass Collaborative, June 2007, *ibid*.



materials, use, and disposal of hazardous materials may increase as a result of implementing the proposed project. Further, if the control option chosen by each affected facility is to install SCR, the proposed project may alter the transportation modes for feedstock and products to/from the existing facilities such as aqueous ammonia and catalyst.

Commercial catalysts used in SCRs are comprised of a base material of titanium dioxide ( $\text{TiO}_2$ ) that is coated with either tungsten trioxide ( $\text{WO}_3$ ), molybdic anhydride ( $\text{MoO}_3$ ), vanadium pentoxide ( $\text{V}_2\text{O}_5$ ), or iron oxide ( $\text{Fe}_2\text{O}_3$ ). The key hazards associated with the proposed project are the crushing of the spent catalyst and transporting it for disposal or recycling. With respect to hazards and hazardous materials, this means that there will be an increase in the frequency of truck transportation trips to remove the spent catalyst as hazardous materials or hazardous waste from each affected facility. However, facilities that have existing catalyst-based operations currently recycle the catalysts blocks, in lieu of disposal. Moreover, due to the heavy metal content and relatively high cost of catalysts, recycling can be more lucrative than disposal. Thus, facilities that have existing SCR units and choose to employ additional SCR equipment to comply with the proposed amendments to PAR 1110.2, in most cases already recycle the spent catalyst and subsequently may continue to do so with the additional catalyst that may be needed.

Although recycling may be the more popular consideration, it is possible that facilities may choose to dispose of the spent catalyst in a landfill. The composition and type of the catalyst will determine the type of landfill that would be eligible to handle the disposal. For example, catalysts with a metal structure would be considered a metal waste, like copper pipes, and not a hazardous waste. Therefore, metal structure catalysts would not be a regulated waste requiring disposal in a Class I landfill unless it is friable or brittle. As ceramic-based catalysts contain a fiber-binding material, they are not considered friable or brittle and thus, would not be a regulated waste requiring disposal in a Class I landfill. Furthermore, typical catalyst materials are not considered to be water soluble, which also means they would not require disposal in a Class I landfill. In both cases, spent catalyst would not require disposal in a Class I landfill.

Based on the above information, it is likely that spent catalysts would be considered a "designated waste," which is characterized as a non-hazardous waste consisting of, or containing pollutants that, under ambient environmental conditions, could be released at concentrations in excess of applicable water objectives, or which could cause degradation of the waters of the state (California Code of Regulations, Title 23, Chapter 3 Subparagraph 2522(a)(1)). Depending on its actual waste designation, spent catalysts would likely be disposed of in a Class II landfill or a Class III landfill that is fitted with liners.

Disposal of spent catalyst would typically involve crushing the material and encasing it in concrete prior to disposal. Since it is expected that most spent catalysts will be recycled and regenerated, it is anticipated that there will be sufficient landfill capacity in the district to accommodate disposal of any spent catalyst materials

A number of physical or chemical properties may cause a substance to be hazardous, including toxicity (health), flammability, reactivity, and any other specific hazard such as corrosivity or radioactivity. Based on a hazard rating from 0 to 4 (0 = no hazard; 4 = extreme hazard) located on the Material Safety Data Sheet (MSDS) the hazard rating for silica/alumina catalyst, for example, health is rated 1 (slightly hazardous), flammability is rated 0 (none) and reactivity is rated 0 (none). However, if nickel is deposited on the

catalyst, the hazard rating is 2 for health (moderately toxic), 4 (extreme fire hazard) for flammability, 1 for reactivity (slightly hazardous if heated or exposed to water). The particular composition of the catalyst used in the SCR units, combined with the metals content of the flue gas will determine the hazard rating and whether the spent catalyst is considered a hazardous material or hazardous waste. This distinction is important because a spent catalyst that qualifies as a hazardous material could be recycled or reused by another industry (such as manufacturing California Portland cement). However, spent catalyst that is considered hazardous waste must be disposed of in a Class III landfill.

The use, storage and transport of hazardous materials are subject to numerous laws and regulations at all levels of government. The most relevant existing hazardous materials laws and regulations include hazardous materials management planning, hazardous materials transportation, hazardous materials worker safety requirements, hazardous waste handling requirements and emergency response to hazardous materials and waste incidents. Potential risk of upset is a factor in the production, use, storage and transportation of hazardous materials. Risk of upset concerns is related to the risks of explosions or the release of hazardous substances in the event of an accident or upset conditions.

### **Hazardous Materials Management Planning**

State law requires detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of to prevent or mitigate injury to health or the environment in the event that such materials are accidentally released. Federal laws, such as the Emergency Planning and Community-Right-to-Know Act of 1986 (also known as Title III of the Superfund Amendments and Reauthorization Act or SARA, Title III) impose similar requirements. These requirements are enforced by the California Office of Emergency Services.

The Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires that any business or government agency that handles hazardous materials prepare a business plan, which must include the following (HSC §25504):

- details, including floor plans, of the facility and business conducted at the site;
- an inventory of hazardous materials that are handled or stored on the site;
- an emergency response plan; and
- a training program in safety procedures and emergency response for new employees, and an annual refresher course in the same topics for all employees.
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### **Hazardous Materials Transportation**

The United States Department of Transportation (DOT) has the regulatory responsibility for the safe transportation of hazardous materials between states and to foreign countries. DOT regulations govern all means of transportation, except for those packages shipped by mail, which are covered by the United States Postal Service (USPS) regulations. DOT regulations are contained in the Code of Federal Regulations, Title 49 (49 CFR); USPS regulations are in 39 CFR.

Every package type used by a hazardous materials shipper must undergo tests which imitate some of the possible rigors of travel. While not every package must be put through every test, most packages must be able to meet the following generic test criteria: the ability to be (a) kept under running water for one-half hour without leaking; (b) dropped, fully loaded, onto a concrete floor; (c) compressed from both sides for a period of time; (d) subjected to low and high pressure; and (e) frozen and heated alternately.

Common carriers are licensed by the California Highway Patrol (CHP) pursuant to the California Vehicle Code, §32000, which requires licensing of every motor (common) carrier who transports, for a fee, in excess of 500 pounds of hazardous materials at one time and every carrier, if not for hire, who carries more than 1,000 pounds of hazardous material of the type requiring placards. Common carriers conduct a large portion of their business in the delivery of hazardous materials.

Under the federal Resource Conservation and Recovery Act (RCRA) of 1976, the EPA set standards for transporters of hazardous waste. In addition, the State of California regulates the transportation of hazardous waste originating or passing through the state; state regulations are contained in the California Code of Regulations (CCR), Title 13. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests. Two state agencies have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies: the CHP and the California Department of Transportation (Caltrans).

The CHP enforces hazardous materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provide detailed information to cleanup crews in the event of an accident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP, which conducts regular inspections of licensed transporters to assure regulatory compliance. Caltrans has emergency chemical spill identification teams at 72 locations throughout the state.

### **Hazardous Material Worker Safety Requirements**

The California Occupational Safety and Health Administration (Cal/OSHA) and the Federal Occupational Safety and Health Administration (Fed/OSHA) are the agencies responsible for assuring worker safety in the handling and use of chemicals in the workplace. In California, Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations.

Under the authority of the Occupational Safety and Health Act of 1970, Fed/OSHA has adopted numerous regulations pertaining to worker safety (contained in 29 CFR – Labor). These regulations set standards for safe workplaces and work practices, including the reporting of accidents and occupational injuries. Some OSHA regulations contain standards relating to hazardous materials handling, including workplace conditions, employee protection requirements, first aid, and fire protection, as well as material handling and storage. Because California has a federally-approved OSHA program, it is required to adopt regulations that are at least as stringent as those found in 29 CFR.

Cal/OSHA regulations concerning the use of hazardous materials in the workplace (which are detailed in CCR, Title 8) include requirements for employee safety training, availability of safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. Cal/OSHA enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances as well as communicating hazard information related to hazardous substances and their handling. The hazard communication program also requires that Material Safety

Data Sheets (MSDSs) be available to employees and that employee information and training programs be documented. These regulations also require preparation of emergency action plans (escape and evacuation procedures, rescue and medical duties, alarm systems, and emergency evacuation training).

Both federal and state laws include special provisions for hazard communication to employees in research laboratories, including training in chemical work practices. The training must include methods in the safe handling of hazardous materials, an explanation of MSDSs, use of emergency response equipment and supplies, and an explanation of the building emergency response plan and procedures.

Chemical safety information must also be available. More detailed training and monitoring is required for the use of carcinogens, ethylene oxide, lead, asbestos, and certain other chemicals listed in 29 CFR. Emergency equipment and supplies, such as fire extinguishers, safety showers, and eye washes, must also be kept in accessible places. Compliance with these regulations reduces the risk of accidents, worker health effects, and emissions.

National Fire Codes (NFC), Title 45 (published by the National Fire Protection Association) contains standards for laboratories using chemicals, which are not requirements, but are generally employed by organizations in order to protect workers. These standards provide basic protection of life and property in laboratory work areas through prevention and control of fires and explosions, and also serve to protect personnel from exposure to non-fire health hazards.

While NFC Standard 45 is regarded as a nationally recognized standard, the *California Fire Code* (24 CCR) contains state standards for the use and storage of hazardous materials and special standards for buildings where hazardous materials are found. Some of these regulations consist of amendments to NFC Standard 45. State Fire Code regulations require emergency pre-fire plans to include training programs in first aid, the use of fire equipment, and methods of evacuation.

### **Hazardous Waste Handling Requirements**

The RCRA created a major new federal hazardous waste regulatory program that is administered by the EPA. Under RCRA, the EPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste from “cradle to grave.”

RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle-to-grave” system of regulating hazardous wastes. HSWA specifically prohibits the use of certain techniques for the disposal of some hazardous wastes.

Under RCRA, individual states may implement their own hazardous waste programs in lieu of RCRA as long as the state program is at least as stringent as federal RCRA requirements. The EPA approved California’s program to implement federal regulations as of August 1, 1992.

The Hazardous Waste Control Law (HWCL) is administered by the California Environmental Protection Agency Department of Toxic Substance Control (DTSC). Under HWCL, DTSC has adopted extensive regulations governing the generation, transportation, and disposal of hazardous wastes. HWCL differs little from RCRA; both laws impose

“cradle to grave” regulatory systems for handling hazardous wastes in a manner that protects human health and the environment. Regulations implementing HWCL are generally more stringent than regulations implementing RCRA.

Regulations implementing HWCL list over 780 hazardous chemicals as well as 20 to 30 more common materials that may be hazardous; establish criteria for identifying, packaging and labeling hazardous wastes; prescribe management practices for hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal and transportation; and identify hazardous wastes that cannot be disposed of in landfills.

Under both RCRA and HWCL, hazardous waste manifests must be retained by the generator for a minimum of three years. Hazardous waste manifests list a description of the waste, its intended destination and regulatory information about the waste. A copy of each manifest must be filed with DTSC. The generator must match copies of hazardous waste manifests with certification notices from the treatment, disposal, or recycling facility.

### **Emergency Response to Hazardous Materials and Wastes Incidents**

Pursuant to the Emergency Services Act, the State has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local government agencies and private persons. Response to hazardous materials incidents is one part of this plan. The Plan is administered by the state Office of Emergency Services (OES), which coordinates the responses of other agencies including EPA, CHP, the Department of Fish and Game, the Regional Water Quality Control Board (RWQCB), and local fire departments. (See *California Government Code* §8550.)

In addition, pursuant to the Hazardous Materials Release Response Plans and Inventory Law of 1985 (the Business Plan Law), local agencies are required to develop “area plans” for response to releases of hazardous materials and wastes. These emergency response plans depend to a large extent on the business plans submitted by persons who handle hazardous materials. An area plan must include pre-emergency planning of procedures for emergency response, notification and coordination of affected government agencies and responsible parties, training, and follow-up.

### **SOLID WASTE**

The Hazardous Materials Transportation Act is the federal legislation regulating the trucks that transport hazardous wastes. The primary regulatory authorities are the U.S. DOT, the Federal Highway Administration, and the Federal Railroad Administration. The Hazardous Materials Transportation Act requires that carriers report accidental releases of hazardous materials to the Department of Transportation at the earliest practicable moment (49 CFR Subchapter C, Part 171).

The DTSC is responsible for the permitting of transfer, disposal, and storage facilities. The Department of Toxic Substances Control conducts annual inspections of hazardous waste facilities. Other inspections can occur on an as-needed basis.

Caltrans sets standards for trucks transporting hazardous wastes in California. The regulations are enforced by the CHP. Trucks transporting hazardous wastes are required to maintain a hazardous waste manifest. The manifest is required to describe the contents of the material within the truck so that wastes can readily be identified in the event of a spill.

With regard to solid non-hazardous wastes, the California Integrated Waste Management Act of 1989 (AB 939), as amended, requires each county to prepare a countywide siting element which identifies how the county and the cities within the county will address the need for 15 years of disposal (landfill and/or transformation i.e., waste-to energy facilities) capacity to safely handle solid waste generated in the county, which remains after recycling, composting, and other waste diversion activities. AB 939 has recognized that landfills and transformation facilities are necessary components of any integrated solid waste management system and an essential component of the waste management hierarchy. AB 939 establishes a hierarchy of waste management practices in the following order and priority: (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation/land disposal.

### **Solid Waste Management**

Permit requirements, capacity, and surrounding land use are three of the dominant factors limiting the operations and life of landfills. Landfills are permitted by the local enforcement agencies with concurrence from the California Integrated Waste Management Board (CIWMB). Local agencies establish the maximum amount of solid waste which can be received by a landfill each day and the operational life of a landfill. Landfills are operated by both public and private entities<sup>24</sup>. Landfills in the district are also subject to requirements of the SCAQMD as they pertain to gas collection systems, dust and nuisance impacts.

Landfills throughout the region typically operate between five and seven days per week. Landfill operators weigh arriving and departing deliveries to determine the quantity of solid waste delivered. At landfills that do not have scales, the landfill operator estimates the quantity of solid waste delivered (e.g., using aerial photography). Landfill disposal fees are determined by local agencies based on the quantity and type of waste delivered. Fees vary by landfill and county.

A total of 25 Class III active landfills and two transformation facilities are located within the district. Based on a search of the California Integrated Waste Management Board's Solid Waste Information System (SWIS) on May 16, 2007, there are approximately 750,846,000 cubic yards (1,250,367,507 tons) of remaining capacity at Class II and III facilities in Los Angeles, Orange County, Riverside and San Bernardino that accept construction waste.

### **Hazardous Waste Management**

Hazardous material, as defined in 40 CFR 261.20 and 22 CCR Article 9, is disposed of in Class I landfills. California has enacted strict legislation for regulating Class I landfills. The California Health and Safety Code requires Class I landfills to be equipped with liners, a leachate collection and removal system, and a ground water monitoring system. There are no hazardous waste disposal sites within the jurisdiction of the SCAQMD.

Hazardous waste generated at area facilities, which is not reused on-site, or recycled offsite, is disposed of at a licensed in-state hazardous waste disposal facility. There are three Class I landfills in California: Chemical Waste Management Kettleman Hills in Kettleman City, CA; Clean Harbors Buttonwillow in Buttonwillow, CA or Clean Harbors Westmorland in Westmorland, CA. Chemical Waste Management Kettleman Hills has a remaining capacity of 7,360,000 cubic yards with an estimated closure date of 2037. Clean Harbors

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<sup>24</sup> CIWMB, Used Oil Facts, 2007.

Buttonwillow and Westmorland have a remaining capacity of 12,731,000 cubic yards with an estimated closure date of 2036.

## **CHAPTER 4**

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### **ENVIRONMENTAL IMPACTS**

**Introduction**

**Potential Environmental Impacts and Mitigation Measures**

**Potential Environmental Impacts Found Not to be Significant**

**Significant Irreversible Environmental Changes**

**Potential Growth-Inducing Impacts**

**Consistency**



## INTRODUCTION

The state CEQA Guidelines require environmental documents to identify significant environmental effects that may result from a proposed project [CEQA Guidelines §15126.2(a)]. Direct and indirect significant effects of a project on the environment should be identified and described, with consideration given to both short- and long-term impacts. The discussion of environmental impacts may include, but is not limited to, the resources involved; physical changes; alterations of ecological systems; health and safety problems caused by physical changes; and other aspects of the resource base, including water, scenic quality, and public services. If significant adverse environmental impacts are identified, the CEQA Guidelines require a discussion of measures that could either avoid or substantially reduce any adverse environmental impacts to the greatest extent feasible [CEQA Guidelines §15126.4].

State CEQA Guidelines indicate that the degree of specificity required in a CEQA document depends on the type of project being proposed [CEQA Guidelines §15146]. The detail of the environmental analysis for certain types of projects cannot be as great as for others. For example, the environmental document for projects, such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan, should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the analysis need not be as detailed as the analysis of the specific construction projects that might follow. As a result, this ~~Draft~~Final EA analyzes impacts on a regional level and impacts on the level of individual industries or individual facilities only where feasible.

The categories of environmental impacts to be studied in a CEQA document are established by CEQA [Public Resources Code, §21000 et seq.], and the CEQA Guidelines, as promulgated by the State of California Secretary of Resources. Under the state CEQA Guidelines, there are approximately 17 environmental categories in which potential adverse impacts from a project are evaluated. Projects are evaluated against the environmental categories in an Environmental Checklist and those environmental categories that may be adversely affected by the proposed project are further analyzed in the appropriate CEQA document.

## POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Pursuant to CEQA, an Initial Study, including an environmental checklist, was prepared for this project (see Appendix D) and circulated along with an NOP/IS for a 30-day public review period. Of the 17 potential environmental impact categories, four (air quality, energy, hazards and hazardous material, and solid/hazardous waste) were identified as being potentially significantly adversely affected by the proposed project. During the public comment period SCAQMD received two comment letters on the NOP/IS. The comment letters and individual responses to comments in each comment letter are included in Appendix E.

As already indicated, the following environmental topic areas: air quality, hazards and hazardous material, and solid/hazardous waste were identified in the NOP/IS as areas that could potentially be adversely affected by the proposed project and are comprehensively analyzed further in this EA. Aesthetics and energy impacts are also evaluated in this EA based on comments received during the public review period for the NOP/IS. The

environmental impact analysis for each environmental topic typically incorporates a “worst-case” approach. This approach entails the premise that whenever the analysis requires that assumptions be made, those assumptions that result in the greatest adverse impacts are typically chosen. In some instances the “worst-case” assumption may not be feasible or possible. In this situation, additional assumptions are made such that reasonable “worst-case” assumptions are assumed for the analysis. This process ensures that all potential effects of the proposed project are documented for the decision-makers and the public.

Accordingly, the following analyses use a reasonable “worst-case” approach for analyzing the potentially significant adverse environmental impacts associated with the implementation of the proposed project.

### **New Projects**

PAR 1110.2 includes requirements for new ICEs. PAR 1110.2 requires that new stationary, non-emergency generators must meet the CARB 2007 standards (Distributed Generation Certification Program, Article 3, Subchapter 8, Chapter 1, Division 30, Title 17 for the California Code of Regulations. These standards have been in effect since January 1, 2007. Other new ICEs would need to meet emissions standards which are already required by the existing rule or BACT which is already required for new equipment. New equipment may need additional monitoring and reporting equipment; however the installation of new monitoring and reporting equipment should have minor environmental impacts compared to the installation of the new ICE. Operators/owners that install new ICEs for any other reason than to replace existing ICEs to comply with PAR 1110.2 are outside the scope of this proposed project. New engines would be required to enter the permit process before construction. All permitted equipment is required to have a CEQA evaluation. Impacts from the construction of new engines would be evaluated at that time. Adverse impacts from the new project will be evaluated during the CEQA review during permitting.

Since operators/owners have other options beside ICEs, such as fuel cells, boilers, gas turbines, microturbines, etc., it is speculative to assess the environmental adverse impacts from future new projects in this document. Therefore, no further analysis of new projects has been prepared for this project.

### **Changes to PAR 1110.2 Since the Release of the Draft EA for Public Review**

#### **Additional Exceptions**

To give operators some additional flexibility, the 10 percent natural gas condition was modified to be based on the facility average rather than for each engine. Several biogas engine operators commented on PAR 1110.2 stating that the 10 percent limit could lead to increased flaring of biogas. One said it could cause a blower engine to shut down, resulting in more flaring of digester gas. Another said that at times there might be insufficient digester gas to run an engine at the minimum load necessary for operation stable operation and with emissions in compliance with permit limits. Another said that some natural gas may be needed in the future if the heating value of landfill gas declines to a level below that needed for proper engine operation.

Another sewage treatment plant operator reported that the 10 percent limit would force a reduction in engine load, and reduce the thermal energy recovered by their waste heat boiler that provides heat to their digesters. At times, the recovered waste heat would not be enough to operate the digesters, and the facility does not have boilers to back up or supplement the engines. The facility operator estimates that three months out of the year more than 10 percent natural gas would be required.

PAR 1110.2 authorizes the Executive Officer (EO) to approve more than 10 percent natural gas in these limited situations. Operators must apply for a change of permit conditions and demonstrate the need for the additional natural gas. The EO will evaluate each case and put appropriate conditions on each permit that will allow the additional natural gas use, but only under conditions when it is deemed necessary.

PAR 1110.2 allows operators to exclude from the calculation of the natural gas percentage the natural gas used in a few situations. One operator asked to be able to use more than 10 percent natural gas when rainy weather causes the sewage treatment plant to operate above its design capacity, requiring the highest use of electrical power for pumps and other equipment. During rainy weather, air quality is at its best and the impact of the higher emissions should be minimal.

The same operator said that plant reliability would be improved if they could increase engine loads, with more natural gas use, when grid electric power is short and rolling brownouts are likely. Allowing this during Stage 2 electrical emergencies has other emission benefits. If the brownout does occur at the facility, the plant's backup diesel generators, which have much higher emissions than the biogas engines, would not have to provide as much of the facility's power requirement, and overall emissions would be reduced. Also, by increasing electrical power output during the Stage 2, brownouts might even be avoided, which prevents widespread backup diesel generator use.

A commenter on PAR 1110.2 stated that lean-burn and RELCAIM engines meet the 2,000 ppm CO limit without oxidation catalyst. An exception from the quarterly CO monitoring was added for diesel and other lean-burn engines that are subject or Regulation XX or have a NOx CEMs and that are not subject to a CO limit more stringent than 2,000 ppm. The engines would still be subject to the I&M plans.

### **Standards for New Distributed Generation Equipment**

Staff originally proposed emission standards that, as of January 1, 2007, CARB already enforce the above standards for distributed generation equipment that do not require local district permits. The CARB standards are based on the emissions from large new central generating stations with BACT. Since large and small electrical generators are already required to meet these standards, the proposed standards will simply extend the same requirements ICEs that require SCAQMD permits. This was the goal of SB1298 as previously described in Chapter 1. However, the Engine Manufacturers Association commented that by increasing the proposed limits, in lbs/MW-hr, from 0.10 to 0.20 for CO and from 0.02 to 0.10 for VOC, some advanced engines may be able to comply.

## Analysis of New Changes to PAR 1110.2

### Emergency and Rainy Day Exemptions

The new exceptions to the monthly 10 percent requirement were added to address either emergency operations or extremes in weather. Since emergencies and extremes in weather cannot be predicted, adverse impacts from these changes are considered to be speculative and will not be addressed in the Final EA.

### Exception for ICEs That Are Used to Heat Digesters

Emission increases for facility that would need to run more than 10 percent natural gas over three months a year to supplement heat to the digesters were estimated and presented in Table 4-0a. Detailed calculations can be found at the end of Appendix C. Table 4-0b shows that the additional emissions from the exception for ICEs that are used to heat digesters would not increase criteria pollutants that are less than significant to become significant. PM2.5 was determined to be significant in the Draft EA. The additional PM2.5 from the waste heat boiler would increase project PM2.5 emissions by approximately one pound. The additional PM2.5 increase is less than the SCAQMD CEQA threshold of 55 pounds per day. Therefore, the additional PM2.5 emissions are not considered a substantial increase in the severity of an adverse environmental impact that would require recirculation. The additional emissions have been added to the emission tables in the air quality section.

**Table 4-0a**  
**Summary of Exception for Natural Gas for Waste Heat Recovery Boilers**

<u>Description</u>	<u>NOx</u> <u>Emissions,</u> <u>lb/day</u>	<u>CO</u> <u>Emissions,</u> <u>lb/day</u>	<u>VOC</u> <u>Emissions,</u> <u>lb/day</u>	<u>SOx</u> <u>Emissions,</u> <u>lb/day</u>	<u>PM10</u> <u>Emissions,</u> <u>lb/day</u>	<u>PM2.5</u> <u>Emissions,</u> <u>lb/day</u>
<u>ICE</u>	<u>5.41</u>	<u>32.85</u>	<u>8.84</u>	<u>0.6</u>	<u>0.88</u>	<u>0.87</u>

**Table 4-0b**  
**Update to Proposed Project Emissions**

<u>Description</u>	<u>NOx</u> <u>Emissions,</u> <u>lb/day</u>	<u>CO</u> <u>Emissions,</u> <u>lb/day</u>	<u>VOC</u> <u>Emissions,</u> <u>lb/day</u>	<u>SOx</u> <u>Emissions,</u> <u>lb/day</u>	<u>PM10</u> <u>Emissions,</u> <u>lb/day</u>	<u>PM2.5</u> <u>Emissions,</u> <u>lb/day</u>
<u>Boiler</u> <u>Exception</u>	<u>5.41</u>	<u>32.85</u>	<u>8.84</u>	<u>0.6</u>	<u>0.88</u>	<u>0.87</u>
<u>Significance</u> <u>Threshold</u>	<u>55</u>	<u>550</u>	<u>75</u>	<u>150</u>	<u>150</u>	<u>55</u>
<u>Significant or</u> <u>Substantial</u> <u>Increase?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No*</u>

### Quarterly Monitoring Exemption

SCAQMD staff believes that lean-burn engines that are subject or Regulation XX or have a NOx CEMs would meet the 2,000 ppm CO emissions limit. Even though an exception from quarterly monitoring was added, operators would still need to prepare an I&M plan for these

engines. The I&M plan will assist operators with finding engine malfunctions and to correct air-to-fuel ratios to assure proper engine operation, which will reduce emissions.

### **Revision to the New Engine Emission Requirements**

The use of new CARB 2007 Distributed Generated Certification compliant engines was not expected to generate any greater adverse impacts than new distributed generators that are compliant with the existing Rule 1110.2 and BACT, with the exception of air quality. CARB 2007 Distributed Generated Certification compliant engines would generate less NO<sub>x</sub>, VOC and CO. That is, new CARB 2007 Distributed Generated Certification compliant engines are expected to look similar to new engines that are compliant with the existing Rule 1110.2 with BACT, use similar amounts of energy, generate similar amounts of wastes, and generate similar off-site accidental releases. The choice of installation of one new engine over another would not affect any agricultural resources, biological resources, cultural resources, hydrology/water quality, geology/soil, land use/planning, mineral resources, noise, population/housing, public services, recreation or transportation/traffic.

The revision of CO and VOC limits would still achieve the same NO<sub>x</sub> reductions as the original proposal, and for an electrical generator without heat recovery, the revised limits will still achieve an 89 percent reduction of CO and a 77 percent reduction of VOC, compared to the current BACT limits for typical new engines. Even though SCAQMD is in attainment for CO, the CO limit is still necessary because CO contributes to ozone formation and it is a good indicator of catalyst performance, and unlike VOC, can be easily monitored by a CEMS or a portable analyzer. In addition, the number of new distributed engines is unknown and therefore adverse impacts from these engines were considered speculative and not evaluated in the Final EA.

### **Aesthetics**

In the NOP, SCAQMD staff stated that PAR 1110.2 would not require any new development, but may require minor modifications to buildings or other structures for retrofit or replacement. Operators at commercial and industrial facilities may install new, retrofit or replace existing ICEs, control technologies, and/or monitoring equipment. The equipment would be placed within the boundaries of existing commercial or industrial facilities near existing ICE systems. The NOP/IS concluded that installation of retrofit control equipment such as oxidation catalyst systems, for example, would not be substantially different in appearance than existing muffler systems. A CEMS equipment housing may need to be built to protect the system from the weather and, therefore, would not be substantially different in physical appearance than the other existing commercial or industrial equipment at these facilities. It was concluded that because retrofitted, replaced and/or new equipment would not be substantially different in size in appearance than existing equipment the proposed project would not obstruct scenic resources or degrade the existing visual character of a site, including but not limited to: trees, rock outcroppings, or historical buildings.

Subsequent to the release of the NOP/IS, it was determined that operators of some biogas facilities may choose to replace ICEs with biogas to LNG facilities, gas turbines, microturbines, boilers or fuel cells. These types of equipment could change the visual

character of the affected facilities, thus, potentially creating adverse aesthetics impacts. This potential impact is evaluated in the “Biogas Facilities” discussion below.

### **Significance Criteria**

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

### **Non-Biogas Engines – New, Retrofit or Replacement Equipment**

The conclusions in the NOP/IS still apply to operators of affected engines who choose to retrofit, replace or add new equipment to existing non-biogas ICE engines. Retrofitted engines would not create significant adverse aesthetics impacts since these equipment would be similar in size and character to existing engines.

### **Non-Biogas Engines – Replacement with Electric Motors and Emergency ICE**

As part of the CEQA analysis, based on cost estimates SCAQMD staff identified 225 non-biogas engines where operators would incur lower compliance costs if they replaced existing ICEs with electric motors instead of incurring the costs of installing emissions controls and monitoring and inspection and maintenance (I&M) equipment that would be necessary to comply with PAR 1110.2. Compliance cost calculations are included in Appendix C. Not all operators with non-biogas engines would replace existing ICEs with electric motors based solely on cost considerations. Therefore, SCAQMD staff assumed that operators of 75 percent of the non-biogas engines that may have cost savings (169 engines) would be voluntarily replaced their existing engines with electric motors. It is assumed that 40 percent of these existing engines would be used as emergency backup generators. Twenty percent would use diesel-fueled emergency backup engines. It is assumed that the remaining 40 percent would not need an emergency backup engine.

The conclusions in the NOP/IS still apply to operators of affected engines who choose to replace non-biogas engines with electric motors. Electric motors would likely be placed at or near the location of the existing ICE that would be removed. If the existing engine is used as an emergency backup engine, then it is assumed it would not be moved. It is assumed that if a new diesel emergency engine is installed it would be near the location of the existing ICE engine that would be removed. Since affected non-biogas facilities would already have an existing ICE, it is not expected that the replacement of the ICE with an electric motor and installation of a new emergency backup diesel engine or the use of the existing engine as an emergency backup engine for a new electric motor would change the visual character of the affected facility.

### **Biogas Engines – New, Retrofit or Replacement Equipment**

With the exception of ducting, add-on control systems are expected to be low in profile and height, and not visible to the surrounding area due to existing fencing along the property lines. Existing structures currently within the facilities may buffer the view of such proposed equipment. Systems that require ammonia or urea such as SCR and NOxTech systems may create a more industrial appearance, if located near facility boundaries. The

SCR and NOxTech systems may be as large as the ICEs that they control and may also be visible from outside the facility if placed near the fence line. At digester gas facilities and operating landfills, these systems may not alter the visual character of the area. At closed landfills, these systems may alter the visual character of the area, thus, adversely affecting the visual continuity of the surrounding area.

Therefore, since SCR and NOxTech systems at closed landfills may alter the visual character of the surrounding areas, PAR 1110.2 may create significant adverse aesthetic impacts at biogas facilities due to the installation of retrofit technologies.

### **Biogas Engines – Replacement Technologies**

Biogas facility operators may choose to replace existing ICEs with biogas to LNG facilities, gas turbines, microturbines, fuel cells or boilers. Turbines, microturbines, fuel cells, and boilers are similar in physical characteristics to existing ICE systems. It is unlikely that replacing ICEs with any one of these technologies would modify the visual characteristics of the existing facilities since they are similar in visual character to the ICEs they would be replacing.

The installation of a biogas to LNG facility would require approximately three acres of land based on the existing LNG facility at the Frank R. Bowerman Landfill in Orange County. The biogas facility would consist of process equipment, storage tanks and truck loading racks. Because of the size of the biogas to LNG facility, process equipment and truck loading racks, the equipment and truck loading operations may be visible from outside of the facility. In addition, the process equipment may need additional lighting. Therefore, the installation of a biogas to LNG facility may alter the visual character of the area, thus, adversely affecting the visual continuity of the surrounding area.

Therefore, since SCR and NOxTech systems at closed landfills and LNG facilities may alter the visual character of the surrounding areas, PAR 1110.2 is significant for adverse aesthetic impacts at biogas facilities.

Affected industry representatives have indicated that instead of complying with PAR 1110.2 through retrofitting existing engines, replacing them with new compliant engines, or replacing existing engines with alternative technologies they may simply replace existing engines with flares. Adding a new flare could further degrade the existing visual character of a facility, even though most biogas facilities have an existing flare as an emergency backup system. The potential installation of flares could further degrade the visual character of a biogas facility and, therefore, may create significant adverse aesthetics impacts. To prevent replacement of ICEs with flares, SCAQMD staff has committed to a technology assessment to verify that feasible control options are available to comply with PAR 1110.2 to prevent replacement of biogas ICEs with continuous flaring. If the technology assessment shows potential for flaring or that feasible control options for biogas engines are not available, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. Therefore, the continuous use of new or existing flares ~~are~~ is not expected to be consequence of PAR 1110.2.

**Project-Specific Mitigation Measures:**

Significant adverse aesthetic impacts are only expected as a result of complying with PAR 1110.2 at biogas facilities. No specific mitigation measures were identified to reduce adverse aesthetic impacts. It is expected that facility operators would place control technology or ICE alternatives away from property boundaries. However, space issues and the location of utilities, location and quality of the biogas source, and piping may dictate the placement of equipment. Equipment may be masked by perimeter walls or landscape vegetation; although, fire prevention and safety issues would take precedence over aesthetic concerns. As a result, there is no guarantee that landscape vegetation would be available as a means of reducing aesthetics impacts.

A technology assessment will be completed in 2010 to evaluate possible control options PAR 1110.2. The technology assessment evaluate whether that feasible control options are available to comply with PAR 1110.2 to prevent replacing biogas ICEs with continuous biogas flaring. If the technology assessment shows potential for flaring or that feasible control options for biogas engines are not available, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. Therefore installation of flares is not considered to be a reasonably foreseeable adverse aesthetics impact.

Since the location and type of control equipment or ICE replacement is unknown for any specific biogas facility and the effectiveness of perimeter walls and landscaping to minimize aesthetics impacts is unknown, it is assumed that aesthetics impacts cannot be mitigated to less than significant.

**Remaining Aesthetic Impacts:**

Since no project-specific mitigation measures were identified that could eliminate significant adverse aesthetic impacts, aesthetics impacts remain significant.

**Cumulative Aesthetic Impacts:**

Since project-specific adverse aesthetic impacts are significant, it is possible that cumulative aesthetic impacts from other related facilities in the vicinity of each affected biogas facility that would be subject to PAR 1110.2 could be cumulatively considerable. However, since no biogas facility is within three miles of another biogas facility, potential project-specific aesthetic impacts at more than one affected biogas facility are not perceptible, and, therefore, not considered to be cumulatively considerable as defined by CEQA Guidelines §15064(h)(1). Therefore, PAR 1110.2 is not expected to generate significant adverse cumulative aesthetics impacts.

**Cumulative Aesthetic Impact Mitigation:**

Because implementing PAR 1110.2 is not expected to create significant adverse cumulative aesthetic impacts, no cumulative impact mitigation measures are required.



## Air Quality

### Significance Criteria

To determine whether or not air quality impacts from adopting and implementing PAR 1110.2 are significant, impacts will be evaluated and compared to the following criteria. The proposed project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 4-1 are equaled or exceeded.

**Table 4-1  
Air Quality Significance Thresholds**

<b>Mass Daily Thresholds <sup>a</sup></b>		
<b><u>Pollutant</u></b>	<b><u>Construction <sup>b</sup></u></b>	<b><u>Operation <sup>c</sup></u></b>
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
<b>Toxic Air Contaminants (TACs) and Odor Thresholds</b>		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Hazard Index $\geq$ 1.0	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>Ambient Air Quality for Criteria Pollutants</b>		
NO2  1-hour average annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.25 ppm (state) 0.053 ppm (federal)	
PM10 24-hour average annual geometric average annual arithmetic mean	10.4 $\mu\text{g}/\text{m}^3$ (construction) & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$ 20 $\mu\text{g}/\text{m}^3$	
PM2.5 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
Sulfate 24-hour average	1 $\mu\text{g}/\text{m}^3$	
CO  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	

<sup>a</sup> Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea & Mojave Desert Air Basins).

<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

KEY: lbs/day = pounds per day      ppm = parts per million       $\mu\text{g}/\text{m}^3$  = microgram per cubic meter       $\geq$  greater than or equal to

**Direct Impacts from Implementing PAR 1110.2 – Operation**

PAR 1110.2 would reduce precursor ozone and particulate emissions from gaseous- and liquid-fueled ICEs. Table 4-2 presents the number of ICEs affected by PAR 1110.2. Table 4-3 shows baseline emissions from ICEs derived for the population of ICEs in 2005, using survey information and source test information obtained by SCAQMD staff (see Table 3-5). Table 4-3 shows the year 2005 baseline emission inventories for affected equipment categorized into non-biogas and biogas facilities.

**Table 4-2  
Inventory of Engines**

Category	Diesel	Digester Gas	Digester/ Landfill Gas	Field Gas	Landfill Gas	Natural Gas	Propane	Survey <sup>a</sup> Total	Total <sup>b</sup>
Biogas, BACT, <1000		1						1	1
Biogas, BACT, =>1000		2			14			16	20
Biogas, Non-BACT <1000		12						12	15
Biogas, Non-BACT, =>1000		10	3		12			25	31
Non-Biogas, Non-RECLAIM, BACT, Lean, <1000						3		3	4
Non-Biogas, Non-RECLAIM, BACT, Lean, =>1000						16		16	22
Non-Biogas, Non-RECLAIM, BACT, Rich, <1000				9		238	1	248	336
Non-Biogas, Non-RECLAIM, BACT, Rich, =>1000				2		26		28	38
Non-Biogas, Non-RECLAIM, Non-BACT, Rich, <1000						181		181	245
Non-Biogas, Non-RECLAIM, Non-BACT, Rich, =>1000						5		5	7
Non-Biogas, RECLAIM, Non-BACT, Lean, Major, Diesel	6							6	6
Non-Biogas, RECLAIM, BACT, Lean, Major, Diesel	6							6	6
Non-Biogas, RECLAIM, BACT, Rich, Major				1				1	1
Non-Biogas, RECLAIM, BACT, Rich, Non-Major						16		16	20

**Table 4-2 (Continued)  
Inventory of Engines**

Category	Diesel	Digester Gas	Digester/ Landfill Gas	Field Gas	Landfill Gas	Natural Gas	Propane	Survey <sup>a</sup> Total	Total <sup>b</sup>
Non-Biogas, RECLAIM, Non-BACT, Lean, Major						25		25	31
Non-Biogas, RECLAIM, Non-BACT, Lean, Non-Major	18			1		10		29	32
Non-Biogas, RECLAIM, Non-BACT, Rich, Major						1		1	1
Non-Biogas, RECLAIM, Non-BACT, Rich, Non-Major						36		36	44
Survey Total	30	25	3	13	26	557	1	673	1
Total	30	31	4	17	32	744	1		859

- a) SCAQMD staff sent surveys out to permit holders that are affected by PAR 1110.2. The information received from these surveys was used to develop the emissions inventory for PAR 1110.2.
- b) Total number of engines was estimated by scaling the surveyed engines by the number of engines in the permit database by category (biogas, non-biogas, natural gas, diesel, RECLAIM, non-RECLAIM).

**Table 4-3  
Estimated Year 2005 Baseline Emissions Inventory  
Categorized by Non-Biogas and Biogas Facilities**

Description	Number of Engines	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM*, lb/day
Non-Biogas	793	7,336	44,688	1,611	87	741
Biogas	66	1,859	9,555	882	464	136
Total	859	9,195	54,243	2,493	551	877

\* Combustion PM emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.

Table 4-4 shows the estimated emission reductions by year assuming that all affected engines can comply with the emission concentration requirements in PAR 1110.2 and taking into account better monitoring. The estimated emission reductions show emission reductions from the baseline year of 2005. The emission reductions do not show the effects of potential secondary quality impacts, which are analyzed later in this document.

**Table 4-4**  
**Estimated Emission Reductions by Year from the Baseline Year 2005**  
**from Implementing PAR 1110.2**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM* lb/day
2008	204	379	35	8	5
	<u>199</u>	<u>346</u>	<u>26</u>	<u>7</u>	<u>5</u>
2009	2,359	30,936	646	8	5
	<u>2,354</u>	<u>30,903</u>	<u>637</u>	<u>7</u>	<u>5</u>
2009	2,374	31,709	658	8	5
	<u>2,369</u>	<u>31,676</u>	<u>649</u>	<u>7</u>	<u>5</u>
2010	2,748	35,929	1,127	10	8
	<u>2,743</u>	<u>35,896</u>	<u>1,118</u>	<u>9</u>	<u>8</u>
2011	3,093	38,845	1,372	0	0
	<u>3,088</u>	<u>38,752</u>	<u>1,165</u>	<u>9</u>	<u>8</u>
2012	<u>4,335</u>	<u>38,845</u>	<u>1,372</u>	<u>0</u>	<u>0</u>

\* Combustion PM emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.

Table 4-5 shows the total emission reductions by the year 2012 for affected equipment, which is the year of full compliance with PAR 1110.2, categorized into non-biogas and biogas facilities.

**Table 4-5**  
**Estimated Emission Reductions in Year 2012 upon Full Implementation of PAR 1110.2**  
**Categorized by Non-Biogas and Biogas Facilities**

Description	Number of Engines	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM*, lb/day
Non-Biogas	793	2,948	37,383	1,045	0	0
Biogas	66	1,387	1,463	327	0	0
Total	859	4,335	38,845	1,372	0	0

\* Combustion PM emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.

Table 4-6 shows the estimated emission inventories by year from ICEs complying with PAR 1110.2. All emission reductions for the year 2008 are assumed to result from biogas facility operators complying with the provision in subparagraph (d)(1)(C) regarding the operation of engines on 90 percent or more of landfill or digester gas. The emission inventory estimates assume that all affected ICEs will be able to comply with the proposed emission concentration and includes the effects of the enhanced monitoring and enforcement requirements. This analysis does not pre-judge the results of the future technology assessment in 2010, which may conclude that additional time may be necessary for compliance, or different emission concentration limits are appropriate. The declining emission inventories in Table 4-6 also do not take into consideration potential secondary air quality impacts resulting from PAR 1110.2, which are analyzed later in this document.

**Table 4-6**  
**Estimated Remaining Emission by Year**  
**Resulting from Implementing PAR 1110.2**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM* lb/day
2008	9,195	54,243	2,493	551	877
	<u>9,200</u>	<u>54,276</u>	<u>2,502</u>	<u>552</u>	<u>877</u>
2009	8,991	53,865	2,458	544	871
	<u>8,996</u>	<u>53,898</u>	<u>2,467</u>	<u>545</u>	<u>871</u>
2009	6,836	23,307	1,846	544	871
	<u>6,841</u>	<u>23,340</u>	<u>1,855</u>	<u>545</u>	<u>871</u>
2010	6,820	22,534	1,834	544	871
	<u>6,452</u>	<u>18,347</u>	<u>1,375</u>	<u>543</u>	<u>869</u>
2011	6,447	15,458	1,319	542	869
	6,452	18,347	1,375	543	869
2012	4860	1,5398	1,121	551	877

\* Combustion emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (PM 10 emissions are 98 to 99 percent PM2.5).

Table 4-7 shows the year 2012 emission inventories for affected equipment, which is the year of full compliance with PAR 1110.2, categorized into non-biogas and biogas facilities.

**Table 4-7**  
**Estimated Year 2012 Emissions Remaining upon Full Implementation of PAR 1110.2**  
**Categorized by Non-Biogas and Biogas Facilities**

Description	Number of Engines	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM*, lb/day
Non-Biogas	793	4,388	7,305	566	87	741
Biogas	66	472	8,092	555	464	136
Total	859	4,860	15,398	1,121	551	877

\* Combustion PM emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (PM 10 emissions 98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.

#### **Calculating Emissions – Non-biogas Facilities**

To calculate the effects of PAR 1110.2 for non-biogas engines, it was assumed that affected facility operators would install similar types of monitoring and control equipment at each facility. PAR 1110.2 specifies that CEMS, air-to-fuel ratio controllers (ATFRC), and CO analyzers would be needed. Lean burn non-RECLAIM, rich burn non-RECLAIM, and rich burn RECLAIM engines are already controlled by oxidation catalysts. Currently, the only uncontrolled non-biogas engines are lean burn RECLAIM engines. To comply with PAR 1110.2, it is expected that operators of existing uncontrolled, lean burn, RECLAIM non-biogas engines would control VOC and CO emissions through the use of an oxidation catalyst. The

existing uncontrolled, lean burn, RECLAIM non-biogas engines are exempt from PAR 1110.2 NOx requirements, since NOx from these facilities is subject to RECLAIM NOx control requirements.

### ***Emission Assumptions for Existing Equipment***

**Rich-burn Engines:** For non-RECLAIM rich-burn engines that were originally permitted at BACT emission levels and that have NOx CEMS, it was assumed that NOx emissions are maintained on average at 80 percent of the existing Rule 1110.2 NOx emissions limit. For most rich-burn engines, baseline NOx and CO emissions were developed from NOx and CO limits multiplied by factors that are based on SCAQMD compliance test results (see Table 3-4). SCAQMD compliance tests showed that for engines without CEMS, the average ratio of measured NOx to the NOx limit is 5.19 for BACT engines (NOx limit in 8 to 23 ppm range) and 2.12 for non-BACT engines (NOx limit in 36 to 59 ppm range). Although compliance testing did not include VOC data, source test data reported in the engine survey showed that VOC levels tend to correlate to roughly the square root of the CO level.

For RECLAIM major sources, it was assumed that the NOx level is at the apparent "limit," calculated from Annual Emissions Report data. For non-BACT rich-burn engines in RECLAIM, NOx concentrations are often above the range of the SCAQMD compliance data (none tested in this category), and it is assumed that baseline NOx for non-major sources (no CEMS) in this group is maintained, on average, at the NOx limit.

**Lean-burn Engines:** For non-BACT lean-burn RECLAIM engines, non-CEMS NOx emissions were assumed to be maintained at the reported limit or apparent limit that was calculated based on annual emission reporting. CO and VOC emissions were assumed to be 10 percent over source test results on average.

For BACT, non-RECLAIM lean-burn engines, non-CEMS NOx emissions were assumed to be 1.8 times the NOx limit based on SCAQMD compliance test results (see Table 3-4). CO and VOC emissions were assumed 10 percent above average source test results.

### ***Emission Reduction Assumptions to Comply with PAR 1110.2***

The analysis of emissions reductions from non-biogas engines to comply with PAR 1110.2 was based on the type of engine, emission limits and compliance expectations as explained in the preceding subsection. The analysis was based on a total population of 793 non-biogas engines.

For the CEQA analysis, SCAQMD staff performed a cost analysis for existing non-biogas engines comparing various cost of compliance options to the cost of complying with PAR 1110.2, i.e., the costs of installing emissions control equipment, monitoring equipment, I&M, etc., to the cost replacing existing ICES with electric motors (calculations are included in Appendix C). The analysis indicated that the cost of replacing existing specific categories of non-biogas ICES (225 non-biogas ICES out of the total 793 non-biogas engines) with electric motors would be less than the cost of complying with PAR 1110.2 requirements, i.e., the cost of retrofitting the same engines with emissions control equipment, monitoring equipment I&M, etc. Table 4-8 shows the engine categories for the existing 225 engines where the cost of replacing existing ICES with electric motors would be less costly than complying with PAR 1110.2. However, not all operators with non-biogas engines in the engine categories shown in Table 4-8

are expected to replace existing non-biogas ICEs with electric motors based solely on cost considerations. Therefore, SCAQMD staff assumed that operators of 75 percent of the engines shown in Table 4-8 (169 engines) would choose electrification as their compliance option.

**Table 4-8  
Non-biogas ICE Categories Where Replacing Existing ICEs with Electric Motors Would be Less Costly Compared to Complying with PAR 1110.2 Requirements**

Engine Use	Number of Engines Surveyed	Total Engines	Assumed No. of ICEs Replaced with Electric Motors
Non-Biogas, Non-RECLAIM, BACT, Lean, <1000	2	3	2
Non-Biogas, Non-RECLAIM, Non-BACT, Rich, <1000	126	170	128
Non-Biogas, RECLAIM, BACT, Rich, Non-Major	6	7	5
Non-Biogas, RECLAIM, Non-BACT, Lean, Major	15	19	14
Non-Biogas, RECLAIM, Non-BACT, Lean, Non-Major	7	9	7
Non-Biogas, RECLAIM, Non-BACT, Rich, Non-Major	14	17	13
Total	170	225	169

It was assumed that operators who install electric motors on 40 percent of the engines shown in Table 4-8 would keep their existing ICEs as emergency backup generators. It was further assumed that operators who install electric motors on 20 percent of the engines shown in Table 4-8 would purchase new diesel ICEs for emergency backup generators. Finally operators of the remaining 40 percent were assumed not to need emergency backup generators because of the nature of their operations. Emission reductions from replacing 169 existing engines with electric motors are presented in Table 4-9. Secondary emissions from the diesel emergency backup generators are analyzed later in this section.

**Table 4-9  
Emissions Reductions from the Compliance Option of Replacing Existing Non-Biogas ICEs with Electric Motors**

NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM, lb/day	CO <sub>2</sub> , ton/year
1,044	2,507	175	14.3	87.9	107,276

- Combustion PM emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (PM 10 emissions 98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.
- This table presents only the emission reductions from replacing the non-biogas ICEs with electric motors. It does not include the secondary emissions from power plants or emergency engines.

It was assumed that operators of all 624 remaining non-biogas engines would comply with the requirements of PAR 1110.2 by installing appropriate control technologies. Total emission reductions by 2012 for non-biogas ICEs are shown in Table 4-7.

### **Calculating Emissions – Biogas Facilities**

Biogas facilities can be categorized as either landfill gas facilities or digester gas facilities. Landfill gas facilities collect biogas from landfills and combust the biogas to generate electricity. Digester gas facilities collect biogas from water treatment facilities or compost facilities and combust the biogas to generate electricity or power compressors and pumps.

### **Emission Assumptions for Existing Equipment**

Biogas baseline emissions are based on NO<sub>x</sub> limits, landfill gas VOC limits (40 ppm as methane at 15 percent O<sub>2</sub>), average VOC source test results for digester gas engines based on the survey data, and average CO source test results based on the survey data. In all cases except for CEMS-monitored NO<sub>x</sub> engines, baseline emissions are assumed to be, on average, 10 percent higher than the above limits or source test results.

### **Emission Reduction Assumptions to Comply with PAR 1110.2**

It is assumed that operators of biogas systems will comply with PAR 1110.2 by controlling emissions from ICEs with SCR or NO<sub>x</sub>Tech systems or replace the ICE with an alternative technology that would not be regulated by PAR 1110.2, such as, boilers, gas turbines, microturbines, fuel cells or biogas to LNG facilities<sup>25</sup>. Emission reductions from ICEs controlled by SCR or NO<sub>x</sub>Tech systems were estimated based on PAR 1110.2 limits. The emission reductions anticipated for PAR 1110.2 are based on the assumption that operators of biogas facilities can comply with PAR 1110.2 by installing control equipment onto their equipment. However, based on comments received by the regulated industry, operators may replace biogas engines with alternative technologies and, thus, would no longer be subject to PAR 1110.2. If biogas operators choose to replace ICEs with alternative technologies (gas turbines, microturbines, LNG plants, etc.), the alternative technologies would be subject to other regulatory requirements such as Regulation XIII.

To account for the possibility that affected operators may install alternative technologies; staff has calculated the potential emission reduction effects if all affected biogas engines are replaced with alternative technologies. Table 4-10 shows the emission factors used to calculate the emission reduction effects for ICEs, boilers, gas turbines and microturbines. To address concerns of commenters, which have not been verified, SCAQMD staff has committed to a technology assessment in 2010. If the technology assessment shows the potential for flaring, then staff will return to the Governing Board with a proposal addressing any new significant adverse impacts. Facility operators who replace ICEs with fuel cells would not generate any appreciable emissions, so emissions would essentially be zero. The analysis assumes that facility operators who replace ICEs with biogas to LNG facilities would generate emissions from boilers used to produce heat for the process and would use electric motors for electricity.

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<sup>25</sup> ICE alternative technologies are included here based on comments received at PAR 1110.2 working group meetings. Further, LNG derived from biogas would be pretreated for sale offsite or used onsite as natural gas.



**Table 4-10**  
**Emission Factors (lb/MMBtu) for Biogas Facility Control Options**

<b>Pollutant</b>	<b>ICE</b>	<b>Boiler</b>	<b>Gas Turbine</b>	<b>Microturbine</b>
NOx	0.127	0.03	0.084	0.012
CO	0.644	0.0041	0.139	0.047
VOC	0.041	0.0034	0.0048	0.012
PM	0.013	0.0092	0.023	0.0037

NOx, CO, VOC and PM emissions were based on averages of source test data in AQMD files.

SOx was estimated from the fuel digester gas - 40 ppm as H<sub>2</sub>S (R431.1); landfill gas - 150 ppm as H<sub>2</sub>S (R431.1)

CO<sub>2</sub> was estimated from the amount of carbon in the fuel and the amount of CO emitted (see Appendix C).

PM includes both PM<sub>10</sub> and PM<sub>2.5</sub>. PM<sub>10</sub> includes PM<sub>2.5</sub>.

Table 4-11 shows the year 2005 baseline emission inventory for biogas engines and the year 2012 remaining emission inventory, i.e., the year of full compliance with PAR 1110.2 for the various compliance options – add-on control equipment or the use of ICE replacement technology such as gas turbines, microturbines, LNG plants or a mixture of LNG plants and turbines or microturbines (assumed gas turbine or microturbines at digester facilities because of possible facility size restrictions and LNG plants at landfill gas facilities).

**Table 4-11**  
**Year 2012 Remaining Emissions for Various Biogas Facility Control Options**

<b>Description</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM, lb/day</b>
Year 2005 Baseline	1,859	9,555	882	464	136
ICEs with SCR and Ox Cat or other	472	8,092	555	464	136
Replace with Gas Turbines	1,148	1,900	66	464	314
Replace with Microturbines	164	642	164	464	51
Replace with LNG Plants	110	15	13	101	34
Replace LFG w LNG, DG w Turbines	513	784	32	136	142
Replace LFG w LNG, DG w Microturbines	109	269	72	136	34

- Combustion PM emissions were developed from PM<sub>10</sub> emission factors. However, combustion PM emissions are comprised mostly of PM<sub>2.5</sub> emissions (PM<sub>10</sub> emissions 98 to 99 percent PM<sub>2.5</sub>). PM includes both PM<sub>10</sub> and PM<sub>2.5</sub>. PM<sub>10</sub> includes PM<sub>2.5</sub>. LFG is landfill gas. LNG is liquefied natural gas.
- The values in this table are for six possible compliance options. Each compliance option is assumed to be independent so the values are not additive between compliance options.

Table 4-12 shows the year 2012 emission reductions from the year 2005 baseline for the various control options. Although control options other than installing control equipment on existing biogas ICEs may have greater emission reduction benefits, the SCAQMD is not taking credit for emission reductions from alternative control options.

**Table 4-12**  
**Estimated Criteria Emissions/Reductions in 2012 from Year 2005 Baseline for Biogas**  
**Facility Control Options**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM, lb/day
ICEs with SCR and Ox Cat or other	(1,387)	(1,463)	(327)	0	0
Replace with Gas Turbines	(710)	(7,655)	(816)	0	179
Replace with Microturbines	(1,695)	(8,913)	(718)	0	(85)
Replace with LNG Plants	(1,748)	(9,540)	(869)	(363)	(102)
Replace LFG w LNG, DG w Turbines	(1,346)	(8,771)	(850)	(328)	6.0
Replace LFG w LNG, DG w Microturbines	(1,749)	(9,286)	(810)	(328)	(102)

- Combustion PM emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (PM 10 emissions 98 to 99 percent PM2.5). Numbers in parentheses represent emission reductions. PM includes both PM10 and PM2.5. PM10 includes PM2.5. LFG is landfill gas. LNG is liquefied natural gas.
- The values in this table are for six possible compliance options. Each compliance option is assumed to be independent so the values are not additive between compliance options.

### **Secondary Air Quality Impacts – Operation**

To reduce emissions from affected ICEs, it is expected that facility operators would install appropriate air pollution control equipment. Alternatively, operators could replace ICEs with alternative technologies. The following sections evaluate potential secondary adverse air quality impacts from the operation of control equipment, emergency backup power systems that may need to be installed, or alternative ICE replacement technologies. The analysis of secondary adverse impacts is completed for CEQA purposes, using conservative assumptions. Facility operators may not choose compliance options as conservative as presented in this analysis.

### **Secondary Air Quality Impacts – Power Plants**

Facility operators who replace non-biogas ICEs with electric motors and facility operators who replace biogas ICEs with alternative technologies may need additional electricity from the electricity grid than would otherwise be the case if they installed air pollution control equipment on existing affected ICEs. For example, additional electricity may be necessary for biogas ICE alternative technologies because gas turbines and microturbines are less efficient than ICEs. Facility operators who replace biogas ICEs with biogas-to-LNG plants would also need additional electricity to run the plants. Staff assumed that the electricity supplied to the grid for this additional energy would be supplied by new natural gas power plants within the district. SCAQMD staff assumed that grid power replacing engine power or work would be produced in the following ratio: 80 percent by natural gas plants and 20 percent from renewable sources, consistent with California's Renewable Portfolio Standard Program. The average fossil plant efficiency was assumed to be 36 percent based on the USEPA Acid Rain data. Emissions from power plants were derived from those in the SCAQMD annual emission reporting program. NOx and SOx emissions were not included because these emissions are capped by the SCAQMD's RECLAIM (REgional CLean Air Incentives Market) program. Tables 4-13 and 4-14 show estimated emissions from power plants supplying affected non-biogas and biogas facilities, respectively, with additional

electricity. The non-biogas facility values assume facility operators would elect to replace 169 engines with electric motors as a less costly compliance option (see Appendix C).

**Table 4-13**  
**Secondary Emission Increases from Power Plants**  
**Supplying Affected Non-Biogas Facilities with Additional Electricity**

Description	CO, lb/day	VOC, lb/day	PM, lb/day
2009 requirements	12.2	1.0	1.3
2010 requirements	80.2	6.5	8.4
2011 requirements	126	10.2	26.4

- Combustion emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.
- CO2 and VOC emissions were based on CARB emission factors for modern central station power plants (CO = 0.1 lb/MW-hr and VOC = 0.02 lb/MW-hr).
- NOx and SOx emissions are assumed to be capped by RECLAIM.

**Table 4-14**  
**Secondary Emission Increases in 2012<sup>a</sup> from Power Plants Supplying Affected Biogas**  
**Facilities with Additional Electricity<sup>b</sup>**

Description	CO, lb/day	VOC, lb/day	PM, <sup>c</sup> lb/day
ICEs with SCR	1.3	0.10	0.13
Replace with Gas Turbines	51	4.1	5.3
Replace with Microturbines	83	6.7	8.6
Replace LFG w LNG, DG w Turbines	292	24	31
Replace LFG w LNG, DG w Microturbines	305	25	32

- a) SCAQMD staff assumed that operational emission from PAR 1110.2 concentration requirements at biogas facilities would begin in 2012.
- b) NOx and SOx emissions are capped by the RELCLAIM program; therefore, it was assumed that there would be no change in NOx or SOx emissions. LFG is landfill gas. DG is digester gas.
- c) Combustion emissions were developed from PM10 emission factors. However, combustion PM emissions are comprised mostly of PM2.5 emissions (98 to 99 percent PM2.5). PM includes both PM10 and PM2.5. PM10 includes PM2.5.
- d) The values in this table are for six possible compliance options. Each compliance option is assumed to be independent so the values are not additive between compliance options.

Table 4-15 shows total secondary power plant emission increases in the year 2012 that would be generated to supply the electricity needs for both non-biogas ICE replacement electric motors and all possible biogas compliance options.

**Table 4-15**  
**Total Secondary Emission Increases in 2012<sup>a</sup> from Power Plants Supplying Affected Biogas and Non-Biogas Facilities with Additional Electricity<sup>b</sup>**

Description	CO, lb/day	VOC, lb/day	PM, <sup>c</sup> lb/day
ICEs with SCR	127	10.3	26.5
Replace with Gas Turbines	177	14.2	31.6
Replace with Microturbines	209	16.8	35.0
Replace LFG w LNG, DG w Turbines	418	33.7	56.9
Replace LFG w LNG, DG w Microturbines	431	34.8	58.3

- a) SCAQMD staff assumed that operational emission from PAR 1110.2 concentration requirements at biogas facilities would begin in 2012.
- b) NO<sub>x</sub> and SO<sub>x</sub> emissions are capped by the RELCLAIM program; therefore, it was assumed that there would be no change in NO<sub>x</sub> or SO<sub>x</sub> emissions. LFG is landfill gas. DG is digester gas.
- c) Combustion emissions were developed from PM<sub>10</sub> emission factors. However, combustion PM emissions are comprised mostly of PM<sub>2.5</sub> emissions (98 to 99 percent PM<sub>2.5</sub>). PM includes both PM<sub>10</sub> and PM<sub>2.5</sub>. PM<sub>10</sub> includes PM<sub>2.5</sub>.
- d) The values in this table are for six possible compliance options. Each compliance option is assumed to be independent so the values are not additive between compliance options.

#### **Secondary Air Quality Impacts – Ammonia Slip Emissions**

Facility operators may install SCR or NO<sub>x</sub>Tech control systems. Both systems use either urea or aqueous ammonia to control NO<sub>x</sub> emissions. The amount of ammonia introduced into the SCR system is approximately a one-to-one molar ratio of ammonia to NO<sub>x</sub> for optimum control efficiency, though the ratio may vary based on equipment-specific NO<sub>x</sub> reduction requirements. To ensure maximum reduction of NO<sub>x</sub> emissions, slightly more than a one-to-one molar ratio of ammonia to NO<sub>x</sub> may be injected into the exhaust, resulting in unreacted ammonia which escapes or “slips” from the stack and is commonly referred to as ‘ammonia slip.’

Under normal operating and permitted conditions, ammonia slip is approximately five to 10 ppm. Staff estimates approximately 0.44 pounds of ammonia per pound of NO<sub>x</sub> reduced would be required to reduce NO<sub>x</sub> and that 40 percent of the excess ammonia would be injected to produce a slip 10 ppm. Approximately 3,775 pounds of 19 percent ammonia or 1,266 pounds of urea would be used per day to control NO<sub>x</sub> emissions. Based on this emission factor 205 pounds of ammonia would be emitted as slip per day.

There is a potential for a slight increase in the secondary formation of particulate emissions resulting from the use of ammonia in the SCR in the presence of sulfur compounds which are present in small quantities in natural gas. While most of the fuel sulfur is converted to SO<sub>2</sub>, about 1.5 percent is converted to SO<sub>3</sub> in the presence of the SCR catalyst. SO<sub>3</sub> reacts with ammonia in the presence of water from the exhaust and forms ammonium sulfate and ammonia bisulfate, which is a very fine solid. Public Utility Commission-grade low sulfur natural gas contains no more than 0.75 grains/100 standard cubic feet of gas. This is roughly equivalent to 10 parts per million (ppm). Since only a fraction of the sulfur will contribute to formation of particulate, insignificant quantities of particulate will form as a result of the installation of the SCR system.

### **Secondary Air Quality Impacts – Emergency Backup Engines**

For some types of operations, operators replacing existing natural gas engines with electric motors would also need to install emergency backup engines to provide power for necessary operations during power failures. Public comments were received on the NOP/IS and Preliminary Staff Report stating that the costs for air pollution control and monitoring equipment would cause affected facility operators to replace some existing natural gas engines with electric motors and purchase diesel emergency engines. Subsequent to the release of the NOP/IS and Preliminary Staff Report, exceptions added to PAR 1110.2 for the use of two-stroke engines, low usage engines, engines less than 500 bhp and CEMS sharing have eliminated the need for monitoring and control technology on some engines of concern to commenters. Consequently, the costs of installing control equipment, monitoring equipment, etc., on two-stroke engines, low usage engines, engines less than 500 bhp, etc., are not expected to result in operators replacing these engines with electric motors. The following two subsections analyze potential adverse secondary emissions from operating emergency back-up engines at both non-biogas and biogas facilities, respectively.

#### ***Non-Biogas Facilities***

Based on a cost analysis (see Appendix C), SCAQMD staff identified operators of 225 non-biogas engines who would incur lower compliance costs by replacing their existing ICEs with electric motors instead of incurring the costs of installing emissions control and monitoring equipment, I&M, that would be required by PAR 1110.2. Not all operators with non-biogas engines in these engine categories would replace existing ICEs with electric motors based solely on lower compliance costs over ten years. Therefore, SCAQMD staff assumed that operators of 75 percent of non-biogas engines (169 engines) in the specified engine categories (see Table 4-8) would choose the alternative compliance option of replacing existing ICEs with electric motors as the most cost-effective compliance option. It is assumed that: operators of 40 percent of these engines would use the existing engines as emergency generators; operators of 20 percent of these engines would use diesel-fueled emergency engines; and operators of the remaining 40 percent of are not assumed to need an emergency engine.

The analysis further assumed that diesel emergency backup engines would operate 50 hours per year for engine testing (the maximum testing allowed per year pursuant to Rule 1470). For this analysis, it was assumed that the brake horsepower rating of the emergency backup engines installed would be equivalent to the brake horsepower rating of the existing natural gas engine replaced divided by 0.97 to account for electric motor efficiency. Diesel emission factors from 40CFR, Part 89 - Control of Emissions from New and In-Use Compression-Ignition Engines were used.

Finally, it was assumed that the emission factors for the existing natural gas engines would be the same emission factors when they are used as emergency backup. Criteria emissions from emergency engines at non-biogas facilities are presented in Tables 4-16 through 4-18.

**Table 4-16**  
**Criteria Emissions from Diesel Emergency Backup Engines**  
**at Non-Biogas Facilities**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5, lb/day
2009	10.2	6.8	1.14	0.014	0.39	0.39
2010	120	78.8	13.3	0.16	4.5	4.5
2011	159	118	16.9	0.24	6.6	6.6

**Table 4-17**  
**Criteria Emissions from Natural Gas Emergency Backup Engines**  
**at Non-Biogas Facilities**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5, lb/day
2009	11.3	5.8	2.1	0.039	0.27	0.27
2010	55.2	134.1	28.9	0.50	3.4	3.4
2011	68.7	262	31.0	0.61	4.2	4.2

**Table 4-18**  
**Total Criteria Emissions from Emergency Backup Engines**  
**at Non-Biogas Facilities**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5, lb/day
2009	21.6	12.6	3.2	0.053	0.65	0.65
2010	175	213	42.3	0.67	8.0	8.0
2011	228	379	47.9	0.85	10.8	10.8

Includes emission from both biogas and non-biogas emergency engines.

### ***Biogas Facilities***

Operators of biogas facilities who replace existing ICEs with an alternate technology may also require emergency backup ICEs to run compressors and pumps in the event of a power outage. It was assumed that landfill gas facilities would not need to run during emergency loss of power from the electrical grid, since it is believed that landfill gas facilities flare landfill gas during power loss. Digester gas facilities may need to continue to run if power is lost from the electrical grid, since digester gas facilities would need to continually operate pumps. Based on these assumptions and the survey information, it is likely that 33 digester gas facilities may need diesel emergency generators. It was assumed that operators of 80 percent (26 facilities) of the digester gas facilities that need emergency backup engines would use their existing natural gas engines for emergency backup power. Operators of the remaining 20 percent (seven facilities) were assumed to use diesel emergency generators.

The same assumptions used for non-biogas emergency engines were used to develop emissions for digester emergency generators. It was assumed that the diesel emergency engines would be sized for the increased grid dependency (power produced by ICE less power produced by alternative technology or power required to compensate for the pressure drop of add-on control). For the case of blowers replaced by alternative technology, it was assumed that the emergency generator would be sized to replace the shaft work produced by the ICEs. Emergency engines were assumed to operate 50 hours per year. Diesel emission factors from 40CFR, Part 89 - Control of Emissions from New and In-Use Compression-Ignition Engines were used. If existing engines are used as emergency generators for ICE alternative technology, then it was assumed that the emergency generator emissions would be the same as the existing engines. .

Facility operators who install add-on control technology to existing ICEs are not expected to need new emergency backup engines to comply with PAR 1110.2. It is expected that operators would use existing emergency engines or continue to operator without emergency power. If these operators were to install emergency engines, it would be for reasons other than complying with PAR 1110.2.

Based on the above assumptions, criteria emissions from diesel fueled emergency backup engines at biogas facilities are presented in Tables 4-19 through 4-21. Table 4-19 shows emissions from emergency diesel backup engines, Table 4-20 shows emissions from natural gas-fueled emergency backup engines, and Table 4-21 shows total emissions from both diesel fueled- and natural gas-fueled emergency backup engines.

**Table 4-19**  
**Criteria Emissions from Diesel-Fueled**  
**Emergency Backup Engines at Biogas Facilities in 2012**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Replace with Gas Turbines	9.4	7.5	0.96	0.01	0.42	0.41
Replace with Microturbines	22.6	15.7	2.46	0.02	0.89	0.87
Replace LFG w LNG, DG w Turbines	9.4	7.5	0.96	0.01	0.42	0.41
Replace LFG w LNG, DG w Microturbines	22.6	15.7	2.46	0.02	0.89	0.87

- PM<sub>10</sub> includes PM<sub>2.5</sub>. LFG is landfill gas. DG is digester gas. LNG is liquefied natural gas.
- The values in this table are for six possible compliance options. Each compliance option is assumed to be independent so the values are not additive between compliance options.

**Table 4-20**  
**Criteria Emissions from Natural Gas-Fueled**  
**Emergency Backup Engines at Biogas Facilities in 2012**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Replace with Gas Turbines	14.5	70.4	6.4	0.28	1.9	1.9
Replace with Microturbines	20.6	99.6	9.1	0.40	2.8	2.7
Replace LFG w LNG, DG w Turbines	14.5	70.4	6.4	0.28	1.9	1.9
Replace LFG w LNG, DG w Microturbines	20.6	99.6	9.1	0.40	2.8	2.7

PM<sub>10</sub> includes PM<sub>2.5</sub>. LFG is landfill gas. DG is digester gas. LNG is liquefied natural gas.

**Table 4-21**  
**Total Criteria Emissions from Diesel-fueled and Natural Gas-fueled Emergency**  
**Engines at Biogas Facilities in 2012**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Replace with Gas Turbines	24.0	78.0	7.4	0.30	2.4	2.3
Replace with Microturbines	43.2	115.3	11.5	0.42	3.6	3.6
Replace LFG w LNG, DG w Turbines	23.3	77.4	7.3	0.30	2.3	2.3
Replace LFG w LNG, DG w Microturbines	42.2	114.4	11.5	0.42	3.6	3.6

- PM<sub>10</sub> includes PM<sub>2.5</sub>. LFG is landfill gas. DG is digester gas. LNG is liquefied natural gas.
- The values in this table are for six possible compliance options. Each compliance option is assumed to be independent so the values are not additive between compliance options.

### **Secondary Air Quality Impacts – Spent Catalyst Disposal Trips**

Over time, the effectiveness of catalysts used in both SCR and oxidation air pollution control equipment lose their effectiveness primarily due to clogging of the catalyst pores. Because oxidation catalysts use metals that have substantial economic value, depending on the size of the control unit, they may be recycled and reused. Ceramic-based SCR catalysts can be crushed and reused in concrete. Metal-based SCR catalysts and some ceramic-based catalysts, if not recycled, would be crushed, encased in concrete and eventually disposed of in a Class II landfill or a Class III landfill that is fitted with liners. A detailed discussion on the disposal of spent catalysis can be found in the Solid/Hazardous Waste Impact Section below. While there are several Class II and Class III landfills in the district, there are only three Class I facilities in California, which are located outside of the district. The three Class I facilities are Chemical Waste Management Kettleman Hills in Kettleman City, CA; Clean Harbors Buttonwillow in Buttonwillow, CA and Clean Harbors Westmorland in Westmorland, CA. Since Class I facilities are further away, and therefore require more travel, as a worst-case, it is assumed that all catalyst waste is disposed of at one of the Class I facilities.

As a worst-case analysis, SCAQMD staff assumed that catalyst would be changed out every three years. Because biogas facility operators are not expected to install add-on controls or replace ICEs with alternative technology until after the technology assessment in 2010,



SCAQMD staff does not expect the maximum number of new and replacement catalysts trips to begin until 2014. Based on the SCAQMD engine survey operators of approximately 28 biogas facilities could potentially install SCR and oxidation catalyst systems and operators of seven non-biogas facilities would need to install oxidation catalyst. Based on the size of the largest SCR and oxidation catalysts, it is expected that three truck trips would be necessary to dispose of the catalysts from the largest affected facilities. None of the operators at the 45 facilities with existing catalysts who would need to upgrade their catalysts to comply with PAR 1110.2 would require more than one truck trip for the entire catalyst bed replacement. Since the facilities that require upgrades already dispose of catalysts, there is no expected change in disposal truck trips (i.e., no additional truck trips). Given that catalysts will be installed at different times and are subject to different operating parameters, it is unlikely that spent catalysts would all be replaced on the same day. As a result, it was conservatively assumed that there would be up to two large spent catalyst units disposed of on a single day. Therefore, a maximum of six additional truck trips would occur on any one day as a result of implementing PAR 1110.2 (three trucks per facility from two facilities). There are three possible Class I disposal sites in California: Kettleman City (178 miles from Los Angeles), Buttonwillow (133 miles from Los Angeles), and Westmorland (192 miles from Los Angeles). The intermediate distance, 178 miles per one-way trip, was chosen for this analysis. Spent catalyst haul truck emissions are shown in the first line of Tables 4-22 through 4-26.

Note that Tables 4-22 through 4-26 also show other types of secondary air quality impacts from various types of truck trips based on different compliance options for biogas engines. The information shown in Tables 4-22 through 4-26 assumes that operators 169 non-biogas engines would replace their engines with electric motors (see Table 4-8) and that operators of all remaining non-biogas engines not exempted by the low-use exemption, a total of 264 engines, would comply with PAR 1110.2. Analysis details for the information presented in Tables 4-22 through 4-26 can be found in Appendix C.

**Table 4-22**  
**2014 Secondary Operational Criteria Emission Impacts from Delivery and Disposal Trips –**  
**Non-Biogas and Biogas SCR and Oxidation Catalyst Compliance Options Only**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Spent Catalyst Haul Truck	101	30.9	8.0	0.085	4.9	4.8
New Catalyst Delivery Truck	17.0	5.2	1.34	0.014	0.83	0.80
Spent Carbon Haul Truck	5.66	1.74	0.45	0.0048	0.28	0.27
New Carbon Delivery Truck	5.66	1.74	0.45	0.0048	0.28	0.27
Source Test	5.66	1.74	0.45	0.0048	0.28	0.27
Ammonia Delivery	0.00	0.00	0.00	0.0000	0.00	0.00
Diesel Delivery	5.66	1.74	0.45	0.0048	0.28	0.27
<b>Total</b>	140	43.0	11.1	0.12	6.9	6.6

PM<sub>10</sub> includes PM<sub>2.5</sub>. PM<sub>2.5</sub> emissions were estimated using the CEIDARS PM<sub>10</sub> to PM<sub>2.5</sub> fraction for on-road diesel trucks (96.45%).

**Table 4-23**  
**2014 Secondary Operational Criteria Emission Impacts from Delivery and Disposal Trips –**  
**Non-Biogas Oxidation Catalyst Compliance Option with Biogas Gas Turbine Compliance**  
**Option**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5, lb/day
Spent Catalyst Haul Truck	101	30.9	8.0	0.085	4.9	4.8
New Catalyst Delivery Truck	17.0	5.2	1.3	0.014	0.83	0.80
Spent Carbon Haul Truck	5.7	1.7	0.4	0.0048	0.28	0.27
New Carbon Delivery Truck	5.7	1.7	0.4	0.0048	0.28	0.27
Source Test	5.7	1.7	0.4	0.0048	0.28	0.27
Diesel Delivery	5.7	1.7	0.4	0.0048	0.28	0.27
<b>Total</b>	<b>140</b>	<b>43.0</b>	<b>11.1</b>	<b>0.12</b>	<b>6.9</b>	<b>6.6</b>

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction for on-road diesel trucks (96.45%).

**Table 4-24**  
**2014 Secondary Operational Criteria Emission Impacts from Delivery and Disposal Trips –**  
**Non-Biogas Oxidation Catalyst Option with Biogas Microturbine Compliance Option**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5, lb/day
Spent Catalyst Haul Truck	101	30.9	8.0	0.085	4.93	4.8
New Catalyst Delivery Truck	17.0	5.2	1.3	0.014	0.83	0.80
Spent Carbon Haul Truck	5.7	1.7	0.45	0.0048	0.28	0.27
New Carbon Delivery Truck	5.7	1.7	0.45	0.0048	0.28	0.27
Source Test	5.7	1.7	0.45	0.0048	0.28	0.27
Diesel Delivery	5.7	1.7	0.45	0.0048	0.28	0.27
<b>Total</b>	<b>140</b>	<b>43.0</b>	<b>11.1</b>	<b>0.12</b>	<b>6.9</b>	<b>6.6</b>

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction for on-road diesel trucks (96.45%).

**Table 4-25**  
**Secondary Operational Criteria Emission Impacts from Delivery and Disposal Trips –**  
**Non-Biogas Oxidation Catalyst Option with Biogas Gas Turbine at Digester Facilities and**  
**LNG Plants for Landfill Gas Facility Compliance Options**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5, lb/day
Spent Catalyst Haul Truck	101	30.9	7.97	0.085	4.93	4.8
New Catalyst Delivery Truck	17.0	5.2	1.34	0.014	0.83	0.80
Spent Carbon Haul Truck	5.7	1.7	0.45	0.0048	0.28	0.27
New Carbon Delivery Truck	5.7	1.7	0.45	0.0048	0.28	0.27
Source Test	5.7	1.7	0.448	0.0048	0.28	0.27
Diesel Delivery	5.7	1.7	0.448	0.0048	0.28	0.27
LNG Haul Truck	125	38.2	9.8	0.105	6.10	5.9
<b>Total</b>	265	81.2	20.9	0.22	13.0	12.5

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction for on-road diesel trucks (96.45%).

**Table 4-26**  
**Secondary Operational Criteria Emission Impacts from Delivery and Disposal Trips –**  
**Non-Biogas Oxidation Catalyst Option with Non-Biogas and Microturbine at Digester**  
**Facilities and LNG Plants for Landfill Gas Facility Compliance Options**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5, lb/day
Spent Catalyst Haul Truck	101	30.9	8.0	0.0846	4.9	4.8
New Catalyst Delivery Truck	17.0	5.21	1.34	0.0143	0.83	0.80
Spent Carbon Haul Truck	5.7	1.74	0.45	0.0048	0.28	0.27
New Carbon Delivery Truck	5.7	1.74	0.45	0.0048	0.28	0.27
Source Test	5.7	1.74	0.45	0.0048	0.28	0.27
Diesel Delivery	5.7	1.74	0.45	0.0048	0.28	0.27
LNG Haul Truck	125	38.2	9.8	0.105	6.1	5.88
<b>Total</b>	265	81.2	20.9	0.22	13.0	12.5

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction for on-road diesel trucks (96.45%).

**Secondary Air Quality Impacts – Spent Activated Carbon Disposal Trips**

Activated carbon is typically used in pre-treatment systems for biogas facilities where influent streams have high sulfur content that could potential foul or plug control technology. Digester gas may have high siloxane, hydrogen sulfide (H<sub>2</sub>S) and VOC content, that if not removed may contaminate catalysis. Landfill facilities may not require pretreatment systems.

Based on survey responses there are approximately 28 biogas facilities. Of the 28 facilities, there are approximately 12 landfill facilities in the district, approximately 15 digester gas facilities, one facility that handles both landfill and digester gas. Based on discussions with a contractor, it is believed that activated carbon used in pre-treatment systems would be replaced every three months. However, even though all 28 biogas facilities are expected to need pre-treatment systems, SCAQMD staff assumed that catalyst would be replaced at two facilities on any one day. Based upon available information, SCAQMD staff estimated that two truck trips would be required per facility. One trip to collect and dispose of spent activated catalyst and a second trip to deliver new catalyst. Activated carbon is typically regenerated and reused in treatment systems. Eventually spent activated carbon residues in the form of ash are disposed of in local landfills. Because affected facilities are located throughout the district and the locations of the carbon suppliers and landfill where spent carbon residues would be disposed of are unknown, the analysis assumed a haul trip distance of 30 miles per one-way trip.

Secondary operational criteria emissions from truck trips to supply activated carbon and dispose of carbon residues are presented in Tables 4-22 through 4-26. Detailed calculations are presented in Appendix C.

**Secondary Air Quality Impacts – Ammonia/Urea Delivery Trips**

Ammonia use would be required for facilities where operators install either SCR or NSCR systems, primarily to control NO<sub>x</sub> emissions. The number of delivery trips was estimated from the amount of ammonia that would be required to reduce NO<sub>x</sub> concentrations to the PAR 1110.2 limit of 11 ppm of NO<sub>x</sub>. To reduce hazard impact (see Hazards/Hazardous Material below), SCAQMD policy prohibits the use of new anhydrous ammonia control systems for air pollution control, restricting ammonia for new control systems to 19 percent aqueous ammonia. Therefore, based on SCAQMD policy regarding ammonia used in air pollution control systems, existing engine horsepower, and the assumption that operators of 28 biogas facilities, SCAQMD staff conservatively assumed that up to 38 ammonia deliver truck trips could occur per year, no more than one ammonia delivery truck trip would occur on any single day. Because the actual ammonia supplier for each facility is unknown, staff assumed the trip length for ammonia delivery truck trips were 30 miles per one-way trip.

Secondary operational criteria emissions from ammonia delivery truck trips are presented in Table 4-22. The analysis assumes that alternative biogas compliance options would not require ammonia to comply with PAR 1110.2 NO<sub>x</sub> emission concentrations because these compliance options would no longer be subject to PAR 1110.2 requirements. Detailed calculations are presented in Appendix C.

**Secondary Air Quality Impacts – LNG Delivery Trips**

Operators at biogas facilities who choose the compliance option of replacing existing ICEs with LNG plants could use the LNG onsite as a combustion fuel or export it offsite for use as a vehicle fuel, for example. LNG produced at biogas facilities would most likely be exported offsite using cryogenic tanker trucks. The LNG plant at the Bowerman Landfill in Orange County was used as a model for evaluating secondary air quality impacts from LNG truck deliveries. Based on the quality and amount of natural gas generated at the Bowerman Landfill, operators are expected to use 10,000-gallon cryogenic tanker trucks to export LNG, with one LNG truck delivery trip occurring every other day. Assuming a similar quality of landfill gas will be generated at affected biogas facilities as is generated at the Bowerman Landfill and assuming the use of 10,000-gallon cryogenic tanker trucks, it is expected that approximately 33 LNG delivery truck trips would occur on any single day if operators of all 22 biogas facilities install LNG plants. The estimate of 22 biogas facilities is conservative since only 12 of the biogas facilities are landfill gas facilities. Because the actual LNG customer for each facility is unknown, staff assumed the trip length for LNG delivery truck trips were 40 miles per one-way trip.

Secondary operational criteria emissions from operating travel activities are presented in Tables 4-22 and 4-26. Detailed calculations are presented in Appendix B.

**Total Operational Criteria Emissions from PAR 1110.2**

Tables 4-27 through 4-31 show the year 2005 baseline inventory for all existing equipment and the remaining emission inventory for the compliance years shown, based on emission reductions anticipated for each compliance year. The information shown in Tables 4-27 through 4-31 assumes that operators of 169 non-biogas engines would replace their engines with electric motors (see Table 4-8) and that operators of all remaining non-biogas engines, a total of 624 engines would comply with PAR 1110.2. Table 4-27 shows the remaining emissions by compliance year for the compliance option of all biogas plant operators retrofitting using SCR. Table 4-28 shows the remaining emissions by compliance year for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 4-29 shows the remaining emissions by compliance year for the compliance option of biogas operators replacing ICEs with microturbines. Table 4-30 shows the remaining emissions by compliance year for the compliance option of biogas operators replacing ICEs with digester plant and LNG plants at landfills. Table 4-31 shows the remaining emissions by compliance year for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants. Tables take into account all secondary adverse operational air quality impacts described in the above subsections. Finally, the remaining inventory for the year 2014 for each of the scenarios shown in Tables 4-27 through 4-31 because this is the first year that SCR catalysts are expected to be replaced, based on a three-year operating life.

**Table 4-27**  
**Total Criteria Emissions from Operation with Non-biogas Facilities and SCR at All Biogas Facilities**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875
<b>2008</b>	8,999	53,867	2,458	544	872	870
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,823	17,295	1,281	534	837	835
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>
<b>2011</b>	5,345	13,475	1,207	528	821	819
	<u>5,350</u>	<u>13,508</u>	<u>1,216</u>	<u>529</u>	<u>822</u>	<u>820</u>
<b>2012</b>	4,125	13,423	1,011	538	830	829
<b>2014</b>	4,184	13,441	1,015	538	833	831

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-28**  
**Total Criteria Emissions from Operation with Non-biogas Facilities and Gas Turbines at All Biogas Facilities**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875
<b>2008</b>	8,999	53,867	2,458	544	872	870
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,823	17,295	1,281	534	837	835
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>
<b>2011</b>	5,339	13,473	1,206	528	821	819
	<u>5,344</u>	<u>13,506</u>	<u>1,215</u>	<u>529</u>	<u>822</u>	<u>820</u>
<b>2012</b>	4,825	7,357	533	538	1,016	1,014
<b>2014</b>	4,884	7,375	537	538	1,019	1,017

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-29**  
**Total Criteria Emissions from Operation with Non-biogas Facilities and Microturbines at All Biogas Facilities**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875
<b>2008</b>	8,999	53,867	2,458	544	872	870
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,823	17,295	1,281	534	837	835
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>
<b>2011</b>	5,339	13,473	1,206	528	821	819
	<u>5,344</u>	<u>13,506</u>	<u>1,215</u>	<u>529</u>	<u>822</u>	<u>820</u>
<b>2012</b>	3,860	6,169	638	538	757	756
<b>2014</b>	3,919	6,187	643	538	760	758

**Table 4-30**  
**Total Criteria Emissions from Operation with Non-biogas Facilities and Gas Turbines at Digester Gas Plants and LNG Facilities at Landfill Gas Plants**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875
<b>2008</b>	8,999	53,867	2,458	544	872	870
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>
<b>2009</b>	6,440	23,215	1,814	543	860	858
	<u>6,445</u>	<u>23,248</u>	<u>1,823</u>	<u>544</u>	<u>861</u>	<u>859</u>
<b>2010</b>	5,823	17,295	1,281	534	837	835
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>
<b>2011</b>	5,390	13,489	1,210	528	823	821
	<u>5,395</u>	<u>13,522</u>	<u>1,219</u>	<u>529</u>	<u>824</u>	<u>822</u>
<b>2012</b>	4,254	6,503	523	211	872	870
<b>2014</b>	4,373	6,540	533	211	878	876

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-31**  
**Total Criteria Emissions from Operation with Non-biogas Facilities and Microturbines at**  
**Digester Gas Plants and LNG Facilities at Landfill Gas Plants**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875
<b>2008</b>	8,999	53,867	2,458	544	872	870
	9,004	53,900	2,467	545	873	871
<b>2009</b>	6,410	22,399	1,790	543	858	856
	6,415	22,432	1,799	544	859	857
<b>2010</b>	5,823	17,295	1,281	534	837	835
	5,828	17,328	1,290	535	838	836
<b>2011</b>	5,390	13,489	1,210	528	823	821
	5,395	13,522	1,219	529	824	822
<b>2012</b>	3,870	6,038	569	211	767	765
<b>2014</b>	3,989	6,075	578	211	773	771

PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

### **Construction Air Quality Impacts**

Installing control and monitoring equipment to comply with PAR 1110.2 emission concentrations and monitoring provisions or replacing existing ICEs with alternative technologies is expected to require construction activities. The following subsections analyze construction air quality impacts anticipated from implementing PAR 1110.2.

### **Construction Criteria Emissions**

Based on a survey of facilities with gaseous- and liquid-fueled engines, SCAQMD staff estimates that 242 engines would become subject to source tests starting in 2007; 240 facilities would require minor construction to install infrastructure (sampling ports, platforms, safe access and utilities) by September 2008; 16 facilities are expected to need air/fuel ratio controllers installed in 2009; 20 facilities would need installation of CO analyzers; 24 NO<sub>x</sub>-CO CEMS are expected to be installed by July 2011; seven facilities would need oxidation catalyst by July 2011; 45 facilities would need modification to enhance three-way catalyst by July 2011; and 28 facilities would need SCR by July 2012. Table 4-32 presents the number of facilities requiring some type of construction activity and the compliances dates when construction must be completed.



**Table 4-32**  
**Number of Facilities Where Construction Activities Are Expected to Occur**

<b>Project - Facilities</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>Total</b>
Increased Source Testing	242					242
Inspection & Monitoring	242					242
Install Sampling Infrastructure	240					240
Install AFRC		16				16
Upgrade Three-Way Catalyst			15	30		45
Install Oxidation Catalyst			5	2		7
Install CEMS		4	10	10		24
Install CO Analyzer			15	5		20
Install Pretreatment, SCR, Ox Cat or ICE Alternative Technology					28	28
Facilities with Electrified Engines		4	13	88		105

Construction to install new or modify existing control technologies; replace engines with electric motors; or install infrastructure may require cranes, loaders, forklifts, welders and generator sets. Installation of controllers, analyzers, and CEMS systems are likely to require less heavy equipment. All construction would require delivery truck and worker trips. Table 4-33 presents expected construction equipment expected to be required for the various compliance options.

Construction emission calculations are based on the expected number of facilities expected to be affected and the construction schedule (Table 4-33). Tables 4-34 and 35 show total peak daily construction emissions for each year up to the final compliance date for the various compliance options. The peak daily construction emissions shown in Tables 4-34 and 4-35 assume that operators 169 non-biogas engines would replace their engines with electric motors (see Table 4-8) and that operators of all remaining non-biogas engines, a total of 624 engines, would comply with PAR 1110.2. Table 4-34 shows the construction emissions for biogas and non-biogas facilities by compliance year for the compliance option of all biogas plant operators retrofitting their equipment with SCR, replacing ICEs with gas turbines or replacing ICEs with microturbines. Table 4-38 shows the remaining emissions for biogas and non-biogas facilities by compliance year for the compliance option of digester operators replacing ICEs with gas turbines or microturbines and landfill gas facility operators replacing ICEs with LNG plants. Details of the construction analysis can be found in Appendix C.

**Table 4-33  
Construction Equipment by Technology Installed or Replaced**

<b>Compliance Option/Equipment</b>	<b>Construction Equipment Type</b>	<b>No. of Construction Equipment</b>	<b>Operation Time hour/day</b>
ICE engine removal, three-way catalyst, SCR, NOxTech, CL.AIR <sup>®</sup> , gas turbine, boiler, microturbines, fuel cell, emergency diesel ICE - Paving	Pavers	1	4
	Paving Equipment	1	4
	Rollers	1	2
	Cement and Mortar Mixers	1	3
	Tractors/Loaders/Backhoes	1	4
ICE engine removal, three-way catalyst, SCR, NOxTech, CL.AIR <sup>®</sup> , gas turbine, boiler, microturbines, fuel cell, emergency diesel ICE - Construction	Cranes	1	7
	Rubber Tired Loaders	2	7
	Forklifts	3	7
	Welder	1	7
	Generator Sets	1	7
Source Testing Infrastructure, CEMS	Cranes	1	4
	Rubber Tired Loaders	1	4
	Forklifts	1	4
	Welder	1	7
	Generator Sets	1	7
CO Analyzer, ATRC	Forklifts/Electric Lift	1	4
LNG Plant - Grading	Scrapers	1	8
	Graders	1	8
	Tractors/Loaders/Backhoes	1	7
LNG Plant - Paving	Pavers	1	8
	Paving Equipment	1	8
	Rollers	2	8
	Cement and Mortar Mixers	1	3
	Tractors/Loaders/Backhoes	1	8
LNG Plant - Construction	Cranes	2	7
	Rubber Tired Loaders	2	7
	Forklifts	2	7
	Welder	3	7
	Generator Sets	3	7

**Table 4-34**  
**Criteria Construction Emissions for Biogas and Non-biogas Facilities from Installing SCR, Gas Turbines or Microturbines at All Biogas Facilities**

Description*	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9
<b>2011</b>	247	106	30.4	0.23	12.9	11.9
<b>2012</b>	52.5	22.3	6.4	0.05	2.7	2.5

\* Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates.

PM<sub>10</sub> includes PM<sub>2.5</sub>. PM<sub>2.5</sub> emissions were estimated using the CEIDARS PM<sub>10</sub> to PM<sub>2.5</sub> fraction by combustion source and fuel type.

**Table 4-35**  
**Criteria Construction Emissions for Biogas and Non-biogas Facilities from Installing Gas Turbines or Microturbines at Digester Gas Plants and LNG Facilities at Landfill Gas Plants**

Description*	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	90	42.1	12.0	0.08	5.0	4.6
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9
<b>2011</b>	682	291	84.1	0.60	48.4	35.6
<b>2012</b>	488	206.6	60.2	0.43	38.3	26.2

\* Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates.

PM<sub>10</sub> includes PM<sub>2.5</sub>. PM<sub>2.5</sub> emissions were estimated using the CEIDARS PM<sub>10</sub> to PM<sub>2.5</sub> fraction by combustion source and fuel type.

As shown in Tables 4-34 and 4-35, operators of biogas facilities who choose the compliance options of replacing ICEs with alternative technologies, LNG plants in particular, would require the most construction equipment, therefore creating the highest peak daily construction emissions. However, not all biogas facilities would have enough space to install LNG plants, as these plants may require up to three acres of land. It is not likely that most digester gas facilities would have the sufficient available space to install LNG facilities. In addition, LNG facilities require the highest capital expenditures. The CEC estimates that gas turbines may be a better option than ICEs for facilities between 10 to 18 MW when all factors (e.g., economic, emissions, etc.) are taken into account.<sup>26</sup>

<sup>26</sup> CEC, Landfill Gas-To-Energy Potential in California, Staff Report, 500-02-041V1, September, 2002.

**Criteria Pollutant Significance Determination**

Since construction and operational activities overlap during certain years, the criteria pollutants peak daily emissions were estimated per PAR 1110.2 implementation year and 2014 which represents an average operational year. The year 2014 was chosen as an average operational year since routine catalyst replacement would begin in 2014. Since it was assumed that SCR catalysts would be replaced every three years and biogas facility operators are not expected to install add-on control or ICE replacement technology until after the technology review in 2010; therefore, routine catalyst replacement at biogas facilities would not occur until after the year 2012, starting approximately in 2014.

As noted previously, the analysis peak daily construction emissions assumes that operators of 169 non-biogas engines would replace their engines with electric motors (see Table 4-8) because this is expected to be a less costly compliance option than other compliance options. Further, the analysis assumed that operators of all remaining non-biogas engines, a total of 624 engines, would to comply with PAR 1110.2.

Tables 4-36 through 4-40 present the total net remaining emissions by compliance year that takes into consideration the declining operating emissions inventory from affected equipment reducing emissions to comply with PAR 1110.2 and increased construction emissions from installing air pollution control and monitoring equipment or installing alternative compliance technologies. The tables take into account all secondary adverse operational air quality impacts described in the above subsections. Table 4-36 shows the remaining emissions by compliance year and construction emissions for the compliance option of all biogas plant operators retrofitting using SCR. Table 4-37 shows the remaining emissions by compliance year and construction emissions for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 4-38 shows the remaining emissions by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with microturbines. Table 4-39 shows the remaining emissions by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with digester plant and LNG plants at landfills. Table 4-40 shows the remaining emissions by compliance year and construction emissions for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants. Finally, the remaining inventory for the year 2014 for each of the scenarios is shown in Tables 4-36 through 4-40 because this is the first year that SCR catalysts are expected to be replaced, based on a three-year operating life.

**Table 4-36**  
**Net Remaining Criteria Emissions from Non-biogas Facilities and the SCR Compliance Option at All Biogas Facilities**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	544	877	875
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	17,357	1,298	534	844	842
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,594	13,581	1,237	529	834	831
	<u>5,596</u>	<u>13,614</u>	<u>1,246</u>	<u>530</u>	<u>835</u>	<u>832</u>
<b>2012</b>	4,178	13,445	1,017	538	833	831
<b>2014</b>	4,184	13,441	1,015	538	833	831

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (ICE) and offsite travel (delivery trucks).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-37**  
**Net Remaining Criteria Emissions from Non-biogas Facilities and the Gas Turbine Compliance Option at All Biogas Facilities**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	544	877	875
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	17,357	1,298	534	844	842
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,586	13,579	1,237	529	833	831
	<u>5,591</u>	<u>13,612</u>	<u>1,246</u>	<u>530</u>	<u>834</u>	<u>832</u>
<b>2012</b>	4,878	7,380	539	538	1,019	1,017
<b>2014</b>	4,884	7,375	537	538	1,019	1,017

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (gas turbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-38**  
**Net Remaining Criteria Emissions from Non-biogas Facilities and the Microturbine Compliance Option at All Biogas Facilities**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	544	877	875
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	17,357	1,298	534	844	842
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,586	13,579	1,237	529	833	831
	<u>5,591</u>	<u>13,612</u>	<u>1,246</u>	<u>530</u>	<u>834</u>	<u>832</u>
<b>2012</b>	3,913	6,192	644	538	760	758
<b>2014</b>	3,919	6,187	643	538	760	758

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (microturbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-39**  
**Net Remaining Criteria Emissions from Non-biogas Facilities and the Gas Turbines at Digester Gas Facilities and LNG Facilities at Landfills Compliance Option for Biogas Facilities**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	544	877	875
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	17,357	1,298	534	844	842
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	6,072	13,779	1,295	529	872	857
	<u>6,077</u>	<u>13,812</u>	<u>1,304</u>	<u>530</u>	<u>873</u>	<u>858</u>
<b>2012</b>	4,742	6,710	584	211	911	896
<b>2014</b>	4,373	6,540	533	211	878	876

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (gas turbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

**Table 4-40**  
**Net Remaining Criteria Emissions from Non-biogas Facilities and the Microturbines at**  
**Digester Gas Facilities and LNG Facilities at Landfills Compliance Option for Biogas**  
**Facilities**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	9,089	53,909	2,470	544	877	875
	9,094	53,942	2,479	545	878	876
<b>2009</b>	6,410	22,399	1,790	543	858	856
	6,415	22,432	1,799	544	859	857
<b>2010</b>	5,964	17,357	1,298	534	844	842
	5,969	17,390	1,307	535	845	843
<b>2011</b>	6,072	13,779	1,295	529	872	857
	6,077	13,812	1,304	530	873	858
<b>2012</b>	4,358	6,245	629	211	805	791
<b>2014</b>	3,989	6,075	578	211	773	771

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (microturbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM<sub>10</sub> includes PM<sub>2.5</sub>. PM<sub>2.5</sub> emissions were estimated using the CEIDARS PM<sub>10</sub> to PM<sub>2.5</sub> fraction by combustion source and fuel type.

Tables 4-41 through 4-45 show the net emissions effect taking into consideration emissions reductions from affected equipment reducing emissions to comply with PAR 1110.2 and increased construction emissions from installing air pollution control and monitoring equipment or installing alternative compliance technologies. The tables take into account all secondary adverse operational air quality impacts described in the above subsections. Table 4-41 shows the net emissions effect by compliance year and construction emissions for the compliance option of all biogas plant operators retrofitting using SCR. Table 4-42 shows the net emissions effect by compliance year and construction emissions for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 4-43 shows the net emissions effect by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with microturbines. Table 4-44 shows the net emissions effect by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with digester plant and LNG plants at landfills. Table 4-45 shows the net emissions effect by compliance year and construction emissions for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants. Finally, the net emissions effect for the year 2014 for each of the scenarios is shown in Tables 4-41 through 4-45 because this is the first year that SCR catalysts are expected to be replaced, based on a three-year operating life. Construction will be completed by 2012 so no construction emissions are included in the year 2014. Secondary air quality impacts, as described in previous sections, are included since these will be ongoing.

**Table 4-41**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Installing SCR at All Biogas**  
**Plants -Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(23)	(7.4)	0.1	0.4
	(100)	(301)	(14)	(6.8)	1.0	0.7
<b>2009</b>	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2011</b>	(3,603)	(40,662)	(1,256)	(23)	(43)	(44)
	(3,598)	(40,629)	(1,247)	(22)	(42)	(43)
<b>2012</b>	(5,017)	(40,798)	(1,476)	(13)	(44)	(44)
<b>2014</b>	(5,011)	(40,802)	(1,477)	(13)	(44)	(44)
<b>Positive Emissions Increase</b>						
<b>Operational Significance Thresholds*</b>	55	550	55	150	150	55
<b>Significant?</b>	No	No	No	No	No	No

Values in parentheses are negative values

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (ICE) and offsite travel (delivery trucks).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

\* When construction and operation phases overlap, SCAQMD policy is to use the operational significance thresholds to determine significance.



**Table 4-42**  
**Criteria Net Emission Effects from Non-Biogas Facilities and Gas Turbines at All Biogas**  
**Plants -Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(23)	(7.5)	0.1	0.4
	(100)	(301)	(14)	(6.8)	1.0	0.7
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(36,886)	(1,195)	(18)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2011</b>	(3,609)	(40,664)	(1,256)	(23)	(43)	(44)
	(3,603)	(40,631)	(1,247)	(22)	(43)	(43)
<b>2012</b>	(4,317)	(46,863)	(1,954)	(13)	142	142
<b>2014</b>	(4,311)	(46,868)	(1,955)	(13)	142	142
<b>Positive Emissions Increase</b>					142	142
<b>Operational Significance Thresholds*</b>	55	550	55	150	150	55
<b>Significant?</b>	No	No	No	No	No	Yes

Values in parentheses are negative values

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (gas turbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

\* When construction and operation phases overlap, SCAQMD policy is to use the operational significance thresholds to determine significance.

**Table 4-43**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Microturbines at All Biogas Plants -Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2011</b>	(3,609)	(40,664)	(1,256)	(23)	(43)	(44)
	(3,603)	(40,631)	(1,247)	(22)	(43)	(43)
<b>2012</b>	(5,282)	(48,051)	(1,848)	(13)	(117)	(117)
<b>2014</b>	(5,275)	(48,056)	(1,850)	(13)	(117)	(117)
<b>Positive Emissions Increase</b>						
<b>Operational Significance Thresholds*</b>	55	550	55	150	150	55
<b>Significant?</b>	No	No	No	No	No	No

Values in parentheses are negative values

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (microturbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

\* When construction and operation phases overlap, SCAQMD policy is to use the operational significance thresholds to determine significance.

**Table 4-44**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Gas Turbines at Digester Gas**  
**Facilities and LNG Facilities at Landfills -Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2011</b>	(3,123)	(40,464)	(1,198)	(22)	(5)	(18)
	(3,117)	(40,431)	(1,189)	(22)	(4)	(17)
<b>2012</b>	(4,453)	(47,533)	(1,909)	(340)	33.7	21.3
<b>2014</b>	(4,821)	(47,703)	(1,960)	(340)	1.2	0.75
<b>Positive Emissions Increase</b>					33.7	21.3
<b>Operational Significance Thresholds*</b>	55	550	55	150	150	55
<b>Significant?</b>	No	No	No	No	No	No

Values in parentheses are negative values

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (gas turbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

\* When construction and operation phases overlap, SCAQMD policy is to use the operational significance thresholds to determine significance.

**Table 4-45**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Microturbines at Digester Gas Facilities and LNG Facilities at Landfills -Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)
<b>2011</b>	(3,123)	(40,464)	(1,198)	(22)	(5)	(18)
	(3,117)	(40,431)	(1,189)	(22)	(4)	(17)
<b>2012</b>	(4,837)	(47,998)	(1,864)	(340)	(72)	(84)
<b>2014</b>	(5,205)	(48,168)	(1,914)	(340)	(104)	(104)
<b>Positive Emissions Increase</b>						
<b>Operational Significance Thresholds*</b>	55	550	55	150	150	55
<b>Significant?</b>	No	No	No	No	No	No

Values in parentheses are negative values

Table includes construction and operational emissions. Construction emission included both biogas and non-biogas emissions from on-site (construction equipment, fugitive dust) and off-site travel. Operational emissions include biogas and non-biogas emissions from on-site (microturbines, emergency engines) and offsite travel (delivery trucks and power plants).

Peak daily construction emissions associated with meeting specified PAR 1110.2 requirements by the specified compliance dates. PM10 includes PM2.5. PM2.5 emissions were estimated using the CEIDARS PM10 to PM2.5 fraction by combustion source and fuel type.

\* When construction and operation phases overlap, SCAQMD policy is to use the operational significance thresholds to determine significance.

As shown in Table 4-42, the compliance option in which all biogas facility operators replace ICEs with gas turbines would exceed the regional operational significance threshold for PM2.5 in the years 2012 and 2014. As shown in Tables 4-44 through 4-48, implementing PAR is not expected to result in an exceedance of any operational significance thresholds for VOC emissions or any other criteria pollutants.

## **Toxic Air Contaminant Impacts**

### **Operational Toxic Air Contaminant Emissions**

Adverse health risk effects are estimated by evaluating the impact of toxic air contaminants (TACs) upon receptors surrounding a TAC emissions source. Carcinogenic and chronic noncarcinogenic impacts are evaluated from sources that generate TACs with carcinogenic and chronic noncarcinogenic health risk values consistently over a long period of time (e.g., 70 years for sensitive receptors or 40 years for occupational receptors.). Acute impacts are evaluated from TACs with acute noncarcinogenic health risk values over a short period of time (one hour).

PM emissions from diesel exhaust have carcinogenic and chronic noncarcinogenic health effects. No acute noncarcinogenic health risk values have been established for diesel exhaust. Diesel PM10 carcinogenic health risks are evaluated from mobile sources, i.e.,

emissions diesel truck delivery trips and from stationary sources, i.e., emissions from emergency backup generators. Health effects from diesel particulates emitted from these two primary sources are evaluated in the following subsections. Chronic and acute non-carcinogenic health risks were examined for ammonia slip from the two largest biogas facilities.

### ***Diesel Delivery Truck Trips***

**Diesel Delivery Truck Trips to LNG Facilities:** The LNG facilities have the potential to generate diesel delivery truck trips because of the need to transport LNG to potential customers off-site. However, as noted previously, only the landfill gas operations are expected to be able to replace ICEs with LNG facilities because of the large space requirements of LNG facilities.

It is estimated that a facility generating the largest volume of LNG would generate approximately 4,715,897 gallons of LNG per year. Based on this volume and a standard LNG truck carrying capacity of 10,000 gallons per truck, approximately 472 annual truck trips would be required. Because these facilities need to pre-treat the landfill gas, an additional four truck trips per year (once every three months) would be required to remove carbon from the pretreatment filter and another four truck trips would be necessary to deliver replacement carbon. One truck would be needed to remove catalyst and one to deliver catalyst. Assuming that trucks idle for 15 minutes per trip at the facility (five minutes at the gate, five minutes before delivery and five minutes after delivery), the health risk from diesel exhaust for a sensitive or residential receptor 25 meters away would be  $2.0 \times 10^{-9}$ , which is less the SCAQMD's cancer risk significance threshold of ten in one million ( $10 \times 10^{-6}$ ). Similarly, the greatest chronic hazard index level from diesel exhaust PM from diesel deliver trucks would be  $1.3 \times 10^{-3}$ , which is well below the chronic hazard index significance threshold of 1.0. Additional information regarding this analysis can be found Appendix C.

**Diesel Delivery Truck Trips to Digester Gas Facilities:** Facility operators who retrofit existing equipment with SCR control equipment are not expected to need new emergency backup engines. As a result, no additional diesel truck trips would be generated by these facilities. Since landfill gas operations are not expected to need emergency backup engines and can flare landfill gas in the event of power outages, no carcinogenic risks from diesel emergency engines were assumed to occur. Diesel emergency engines are expected to be needed at digester gas facilities to operate pumps or compressors. Truck trips to digester gas facilities would be necessary to supply diesel fuel. While a total of 178 diesel truck trips may occur in one year for all affected facilities, the number of diesel truck delivery trips to a specific facility is expected to be less than two per year, which is expected to be less than the carcinogenic significance threshold.

### ***Diesel Emergency Backup Generators***

**Biogas Facilities:** Facility operators who replace natural gas ICEs with electric motors and diesel emergency generators would operate a maximum of 50 hours per year with commensurate diesel exhaust particulate matter emissions per year.

It is expected that operators of digester plants where ICEs are either replaced by alternative compliance technologies or add-on control technology is applied, would need emergency backup generators to make-up electricity loss by either the difference in efficiency between the existing ICE and alternative technologies or pressure losses from add-on control technology. A health risk analysis was completed for diesel exhaust particulate matter from the two biogas facilities that are expected to emit the most diesel particulate matter exhaust. The largest facility operates four 4,166 bhp digester gas engines; the other operates two 3471 bhp digester gas engines. It was assumed that the emergency engines would be placed in the same location as the existing natural gas engines and that the emission parameters would be similar. To be conservative, health risk was estimated from the highest off-site concentration assuming the receptor at that location was a sensitive or residential receptor. At both facilities that receptor is a worker receptor. The greatest carcinogenic health risk generated from the use of diesel fueled emergency generators would be 3.4 in one million ( $3.4 \times 10^{-6}$ ), which is less than the SCAQMD's cancer risk significance threshold of 10 in one million ( $10 \times 10^{-6}$ ). The greatest chronic hazard indices from diesel particulate matter exhaust would be 0.002, which is less than the chronic hazard index significance threshold of 1.0. The target organ for diesel exhaust particulate toxicity is the respiratory system. Long-term exposure to diesel exhaust can cause chronic respiratory symptoms and reduced lung function, and may cause or worsen allergic respiratory diseases such as asthma. Additional information regarding this analysis can be found Appendix C.

**Non-biogas Facilities:** As presented in the criteria pollutant analysis, the peak daily operational emissions assumes that operators of 169 non-biogas engines would replace their engines with electric motors (see Table 4-8) because this is expected to be a less costly compliance option than other compliance options. Further, the analysis assumed that operators of all remaining non-biogas engines, a total of 624 engines, would to comply with PAR 1110.2. It is assumed that: operators of 40 percent of these engines would use the existing engines as emergency generators; operators of 20 percent of these engines would use diesel-fueled emergency engines; and operators of the remaining 40 percent of are not assumed to need an emergency engine. Non-biogas emergency generators have higher power ratings than biogas facilities because biogas emergency engines were sized for the efficiency loss between the existing ICE and the add-on emissions control or ICE alternative technology; where non-biogas emergency engines were sized to generate equivalent electricity or shaft work as the electric motor. The three facilities with the largest facilities are not near residential or sensitive receptors. The health risk at the worker receptors near these facilities are below the significance threshold of one in a million. However, the facility with engines with the fourth largest net horsepower would generate a health risk of 18 in one million ( $1.8 \times 10^{-5}$ ), which is greater than the significance threshold of 10 in a million ( $1 \times 10^{-5}$ ). The facility has six 634 bhp natural gas engines used to run pumps. The facility with engines with the fourth largest net horsepower would have a chronic non-carcinogenic health risk of 0.014. The chronic non-carcinogenic health risk from these facilities is much less than the significance threshold of 1.0.

### ***Ammonia Slip Emissions***

Facility operators may install SCR or NOxTech control systems on existing ICEs as possible compliance options. Both technologies can use either urea or aqueous ammonia to

control NOx emissions. The amount of slip is expected to be independent of whether urea or ammonia is used.

Ammonia, though not a carcinogen, can have chronic and acute health impacts. Staff estimates approximately 3.64 pounds of ammonia per brake horsepower would be required to reduce NOx. Similar to the above analysis of diesel particulate matter exhaust health risk analysis, health risks from ammonia were examined at the two facilities with the largest ammonia emissions. The maximum acute hazard index is expected to be 0.4. The greatest chronic hazard index from ammonia at either of the two facilities with the largest ammonia emissions would be 0.97. The target organ for chronic ammonia toxicity is the respiratory system. The target organs for acute ammonia toxicity are the eyes and the respiratory system. Ammonia can cause inflammation of the respiratory tract, which can lead to wheezing, shortness of breath, and chest pain. Inhalation of vapor from concentrated, industrial strength ammonia may cause burns to the respiratory tract. Eye exposure can cause tearing, inflammation, and irritation to temporary or permanent blindness.

### **Operational Health Risks Conclusions**

Health risks are estimated for receptors around a specific source. Health risk from sources at the same facility are additive by type of health risk. Carcinogenic health risks are additive. Non-carcinogenic chronic risks are estimated by target organ and are additive per similar target organ. Non-carcinogenic acute risks are estimated by target organ and are additive per similar target organ. Acute and chronic risks cannot be added together. If facilities are close together (typically within a mile), then the health risk from each facility at receptors shared by the two facilities can be added together.

The preceding cancer and noncancer health risk analyses resulted in the following conclusions. Cancer risk at biogas facilities where operators who would choose to replace existing ICEs with LNG plants from diesel trucks was concluded to be  $1.99 \times 10^{-9}$ , which is less than the SCAQMD's cancer risk significance threshold of ten in one million ( $10 \times 10^{-6}$ ). Noncancer chronic health risks were concluded to be 0.0013, which is well below the chronic hazard index significance threshold of 1.0. Diesel truck trips to digester gas facilities were expected to have negligible health risk effects.

For facility operators at non-biogas facilities who replace natural gas ICEs with electric motors and diesel emergency backup generators, the maximum cancer risk from installing emergency diesel backup generators is approximately 18 in one million ( $1.8 \times 10^{-5}$ ), which is greater than the significance threshold of 10 in one million ( $1 \times 10^{-5}$ ). The non-carcinogenic chronic hazard index from this facility is 0.014, which is less than the significance threshold of 1.0.

The greatest carcinogenic health risk generated from biogas facilities where operators of digester plants replace ICEs with alternative compliance technologies and use diesel fueled emergency backup generators would be 3.4 in one million ( $3.4 \times 10^{-6}$ ), which is less than the SCAQMD's cancer risk significance threshold of 10 in one million ( $1 \times 10^{-5}$ ). The greatest chronic hazard indices from diesel particulate matter exhaust at this facility would be 0.002, which is less than the chronic hazard index significance threshold of 1.0.

Ammonia, used as a reducing agent in SCR and NOxTech control technologies, though not a carcinogen, can have chronic and acute health impacts resulting from ammonia slip. The maximum acute hazard index from ammonia slip emissions would be 0.4, which is less than the acute hazard index significance threshold of 1.0. Since ammonia is the only toxic in this analysis with an acute effect, PAR 1110.2 would not be significant for acute health risk. The greatest chronic hazard index from ammonia at either of the two facilities with the largest ammonia emissions would be 0.97.

At any single biogas facilities, it was assumed that biogas operators would install the same add-on control technology for all of the biogas engines or remove the existing ICEs and replace them with the same alternative ICE technology (i.e., all gas turbines, microturbines or biogas-to-LNG plant). However, some biogas facilities have both biogas and non-biogas engines at the same location. The worst-case carcinogenic health risk could occur at a facility that had both biogas and non-biogas emergency engines. However, the carcinogenic health risk at the facility with both biogas and non-biogas emergency engines should be below the sum of the health risk of the biogas facility with the largest carcinogenic risk and the non-biogas facility with the largest carcinogenic health risk (3.4 in one million + 18 in one million = 21.4 in one million), which is greater than the significance threshold of ten in a million ( $1.0 \times 10^{-5}$ ).

The sum of the hazard indices of the biogas facility with the largest non-carcinogenic risk and the non-biogas facility with the largest non-carcinogenic health risk would be less than the significance threshold of 1.0 ( $0.97 + 0.014 = 0.98$ ).

Based on the above results, implementing PAR 1110.2 has the potential to generate significant cancer risks, but insignificant acute hazard impacts, and insignificant acute and chronic hazard impacts.

The exemptions would only allow affected facilities to operate at existing levels, there would be no new toxic effects. Some TACs are also considered VOCs. While the VOC limit has increased for new DG engines from the proposal in the Draft EA, the new VOC limits will still be less than the existing BACT limit of 30 ppm VOC; therefore, toxic emission are still expected to be reduced from baseline.

### **Construction Toxic Emissions**

Diesel particulate matter has carcinogenic and chronic non-carcinogenic effects from long-term exposure. Diesel particulate matter does not have acute health risk values. Carcinogenic health risk is estimated over 70 years for sensitive and residential receptors and 40-years for worker receptors. To calculate carcinogenic and chronic non-carcinogenic health risks, annual concentrations data are required. Construction at any facility to comply with the most construction-intensive PAR 1110.2 compliance option (landfill gas to LNG plant) is expected to be limited to no more than 105 days. Construction for other PAR 1110.2 compliance requirements is expected to last one or two days at most. Since the various construction scenarios do not provide one year's worth of concentration data and the exposure duration to construction emissions associated with complying with PAR 1110.2 is much shorter than 70 years (for sensitive receptors) or 40 years (for worker receptors),



carcinogenic and chronic non-carcinogenic health risk from construction activities associated with complying with PAR 1110.2 is expected to be less than significant.

Changes to PAR 1110.2 since the Draft EA was release would not require additional construction.

### **Odor Impacts**

Under normal operating and permitted conditions, ammonia slip is approximately five to 10 ppm. Because exhaust gases are hot, any ammonia slip emissions would be quite buoyant and would rapidly rise to higher altitudes without any possibility of lingering at ground level. The odor threshold of ammonia is one to five ppm, but because of the buoyancy of ammonia emissions and an average prevailing wind velocity of six miles per hour in the Basin, it is unlikely that ammonia slip emissions would exceed the odor threshold. Based on the Tier II health risk analysis the highest concentration at the facility with the greatest ammonia slip would be 0.26 ppm which is below the odor threshold of ammonia.

No more than four diesel truck trips are expected at any affected facility per day. Because diesel trucks are limited to five minutes of idling at a single time by state regulation, no adverse odor impacts are expected.

Emergency ICE engines are limited to 50 hours of operation per year for testing. Testing events typically don't last more than 30 minutes and usually no more frequently than once per week. Because of this limitation no odor impacts are expected.

The exemptions would allow affected engines to operate at current levels during emergencies and certain weather conditions; therefore, no new odor emissions are expected. The increases in VOC and CO emission limits for new DG engines would be less than existing BACT for new engines; therefore, PAR 1110.2 would reduce emissions that may cause odors.

### **Global Warming Impacts**

As indicated in Chapter 3, combustion processes generate greenhouse gas (GHG) emissions in addition to criteria pollutants. The following analysis focuses on directly emitted CO<sub>2</sub> because this is the primary GHG pollutant emitted during the combustion process and is the GHG pollutant for which emission factors are most readily available. CO<sub>2</sub> emissions were estimated using emission factors from CARB's EMFAC2007 and Offroad2007 models and EPA's AP-42.

The analysis of GHGs is a much different analysis than the analysis of criteria pollutants for the following reasons. For criteria pollutants significance thresholds are based on daily emissions because attainment or non-attainment is based on daily exceedances of applicable ambient air quality standards. Further, several ambient air quality standards are based on relatively short-term exposure effects on human health, e.g., one-hour and eight-hour. Since the half-life of CO<sub>2</sub> is approximately 100 years, for example, the effects of GHGs are longer-term, affecting global climate over a relatively long time frame. As a result, the SCAQMD current position is to evaluate GHG effects over a longer timeframe than a single day. Although GHG emissions are typically considered to be cumulative impacts because

they contribute to global climate effects, this ~~Draft~~Final EA for PAR 1110.2 analyzed the GHG emissions as project specific impacts because of the close relationship between CO and CO<sub>2</sub> emissions from compliance options. For example, installation of oxidation catalyst to reduce CO emissions has the potential to increase CO<sub>2</sub> emissions. Alternatively, replacing ICEs with electric motors reduces direct CO<sub>2</sub> emissions, while incrementally increasing CO<sub>2</sub> emissions from utility power generating equipment.

SCAQMD staff assumed for the CEQA analysis, that for some categories of ICEs, it may be less costly to install electric motors than comply with PAR 1110.2. SCAQMD staff identified 225 ICEs where it would be less costly to install electric motors (see Table 4-8). To provide a conservative analysis, staff assumed that operators of only 75 percent of these engines, 169 engines, would install electric motors. Electric motors are estimated to have a lifespan of 10 years. For the purposes of addressing the GHG impacts of PAR 1110.2, the overall impacts of CO<sub>2</sub> emissions from the project were estimated and evaluated from initial implementation of the proposed project in 2009 through 2019 (i.e., over the lifespan of the electric motors). While the analysis was only completed over the lifespan of the electric motor, it is expected that the reduction would continue, since facility operators would be expected to replace electric motors with another electric motor once the original is replaced.

The analysis estimated CO<sub>2</sub> emissions from all sources (primary and secondary, construction and operation) from the beginning of the proposed project to the end of the project. The beginning of the proposed project would be 2009, since it was assumed that electric motors would be installed starting in 2009. The end of the proposed project for this analysis is the 2018, which correlates to the useful life of an electric motor. With electric motors the proposed project would have a reduction in CO<sub>2</sub> over the ten years. Without the electric motors in the proposed project there would be an increase in CO<sub>2</sub> over the same time frame.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, no new CO<sub>2</sub> emissions would be generated. VOC and CO emissions limits for new DG engines have increased; however, the lower emissions would have been achieved either by more efficient combustion or add-on control technology. More efficient combustion and add-on control technology would convert CO to CO<sub>2</sub>. Since more CO would be allowed, less CO<sub>2</sub> would be emitted. Therefore, the changes to PAR 1110.2 since the Draft EA would only reduce the amount of CO<sub>2</sub> generated.

### **Minimum Number of ICEs That Are Required to Prevent a Net Increase in CO<sub>2</sub> from PAR 1110.2**

Since the proposed project would generate CO<sub>2</sub> without replacement of some non-biogas engines with electric motors, SCAQMD staff estimated the minimum number of non-biogas engines that would need to be replaced in order to prevent a net CO<sub>2</sub> increase. The analysis was based on average CO<sub>2</sub> emissions per engine. Staff believes this to be a conservative approach since larger and more heavily used engines are more likely to be electrified. To prevent a net increase in CO<sub>2</sub> emissions, approximately 15 of the 225 non-biogas ICEs that are expected to have lower cost by replacing ICEs with electric motors than complying with PAR 1110.2 requirements would need to be replaced with electric motors. This is summarized in Table 4-49. A description of worst-case compliance option is included in the

first column. The second column shows the CO<sub>2</sub> emission reductions for the project with electric motors. The third column present the CO<sub>2</sub> emission increases without electric motors. The fourth column shows the CO<sub>2</sub> reductions that would occur with the electric motors. The fifth column shows the average CO<sub>2</sub> savings per electric motor. The last column presents the number of electric motors that would be required for a reduction of CO<sub>2</sub> emissions.

### Conclusion

Based on the above air quality analysis, implementing PAR 1110.2 is expected to generate overlapping operational and construction emissions that have the potential to exceed the operational directly emitted PM<sub>2.5</sub> significance threshold by 25 pounds (142 pounds per day – 55 pound per day PM<sub>2.5</sub> significance threshold, see Table 4-42) for the gas turbine biogas compliance option. PAR 1110.2 would also be significant for carcinogenic health risk from diesel emergency engines during operations at non-biogas facilities. Therefore, PAR 1110.2 is significant for air quality for operational and construction criteria pollutants and carcinogenic health risk. Because of the expected replacement of some non-biogas engines with electric motors, CO<sub>2</sub> emissions are expected to be reduced by PAR 1110.2.

**Table 4-46**  
**Average Number of ICE Engines Replaced with Electric Motors Needed for CO<sub>2</sub> Reductions under the Worst-Case (Gas Turbines)**

#### Gas Turbines – CO<sub>2</sub> Reductions

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor for CO <sub>2</sub> Reductions
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,181)	5		
<b>2009</b>	121,080	(23,358)	18,614		
<b>2010</b>	(41,973)	(23,358)	18,614		
<b>2011</b>	(52,600)	(21,905)	30,695		
<b>2012</b>	(18,703)	11,236	29,938		
<b>2014</b>	(18,776)	11,163	29,938		
<b>2013-2018</b>	(112,654)	66,976	179,630		
<b>10 year total</b>	(104,849)	9,591	114,439	677	15

Electric motors were assumed to have a ten year lifespan (2009 the expected start date of ICE replacement with electric motors to 2019).

It is possible that fewer than 169 non-biogas engines could be replaced with electric motors, but, given the lower costs of installing and operating electric motors, it is likely that at least 15 non-biogas engines or more would be replaced with electric motors.

Exceptions and increase in VOC and CO emission limits for new engines added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, no new adverse air

quality impacts were identified. Based on the above analysis, the new exceptions and increase in VOC and CO emission limits for new engines would not make an adverse air quality impact that was identified as not significant, significant; nor make an adverse air quality impact that was already identified as significant in the Draft EA substantially worse.

**Project Specific Mitigation Measures:** PM<sub>2.5</sub> emissions contributing to the criteria pollutant significance determination are generated by gas turbines, if this compliance option is chosen instead of complying with biogas requirements of PAR 1110.2. In addition, secondary PM<sub>2.5</sub> emissions from emergency diesel backup generators gas turbines and for electric motors installed at non-biogas facilities, diesel trucks transporting materials, e.g., catalyst, activated carbon, etc., to and from affected facilities, and power plant emissions would occur. Based on the gas turbine biogas compliance option, PAR 1110.2 has the potential to emit 142 pounds of PM<sub>2.5</sub> per day.

New gas turbines installed as a compliance option instead of complying with PAR 1110.2 would likely be subject to Rule 1303 or Rule 2005 BACT requirements. No add-control technology has been identified to reduce PM<sub>2.5</sub> emissions from gas turbines.

Emergency diesel backup generators installed at non-biogas facilities would likely be subject to particulate requirements of Rule 1470. The analysis of air quality impacts assumed that emergency diesel backup generators would comply with Rule 1470 requirements, cancer risk was still significant under the gas turbine compliance options (see Table 4-42). To further reduce diesel PM emissions diesel particulate filters (DPFs) will be required for any emergency diesel backup generators used at non-biogas facilities where operators install electric motors and the carcinogenic health risk exceeds 10 in one million ( $1 \times 10^{-5}$ ). DPFs allow exhaust gases to pass through the filter medium, but trap diesel PM. Depending on engine baseline emissions and emission test method or duty cycle, DPFs can achieve a PM emission reduction of greater than 85 percent. In addition, DPFs can reduce HC emissions by 95 percent and CO emissions by 90 percent. Limited test data indicate that DPFs can also reduce NO<sub>x</sub> emissions by six to ten percent. Most DPFs require periodic regeneration, most commonly achieved by burning off accumulated diesel PM. There are both active DPFs and passive DPFs. Active DPFs use heat generated by means other than exhaust gases (e.g., electricity, fuel burners, microwaves, and additional fuel injection to increase exhaust gas temperatures) to assist in the regeneration process. Passive DPFs, which do not require an external heat source to regenerate, incorporate a catalytic material, typically a platinum group metal, to assist in oxidizing trapped diesel PM. Although there is a slight increase in directly emitted NO<sub>2</sub> during the regeneration of passive DPFs, overall there is ultimately a net reduction in NO<sub>2</sub> emissions. Many engines can also limit their testing to be less than 30 hours per year to reduce carcinogenic health risk to below 10 in one million.

Since facility operators typically do not own the diesel delivery trucks, no mitigation is available to reduce the significant carcinogenic health risk from diesel delivery trucks.

The exceptions and increase in VOC and CO emission limits for new engines added to the proposed project after the Draft EA was circulated for public review do not make adverse air quality impacts, identified in the Draft EA as not significant, significant; nor substantially

increase the severity of an air quality topic that was identified as significant in the Draft EA. In addition, the exceptions and increase in VOC and CO emission limits for new engines would not make an air quality topic that was identified as mitigated to not significant, significant; nor substantially increase the severity of an air quality topic that was mitigated, but still significant in the Draft EA.

**Remaining Air Quality Impacts:** Based on a PM control efficiency of 85 percent from installing DPFs on emergency diesel backup generators, it is expected that PM<sub>2.5</sub> emission impacts from gas turbines, delivery trucks and diesel emergency backup generators would remain significant. DPFs are only expected to reduce PM<sub>2.5</sub> emissions from emergency diesel backup generators by approximately one pound per day. DPFs installed on diesel backup generators are, however, expected to reduce significant adverse cancer risks to less than significant. The maximum cancer risk at the largest non-biogas facility can be reduced from approximately 18 in one million ( $1.8 \times 10^{-5}$ ) to approximately 4.5 in one million ( $4.5 \times 10^{-6}$ ), which is less than the SCAQMD's cancer risk significance threshold of 10 in one million ( $1.0 \times 10^{-5}$ ). Even if the carcinogenic health risk from both the biogas and non-biogas facilities were added together (21.4 in one million or  $2.14 \times 10^{-5}$ ), DPF would reduce the carcinogenic health risk to less than significant ( $2.14 \times 10^{-5} \times (1-0.85) = 3.21$  in one million).

The exceptions and increase in VOC and CO emission limits for new engines added after the Draft EA was circulated for public review would not substantially alter the remaining air quality impacts or generate new remaining air quality impacts.

**Cumulative Air Quality Impacts:** The preceding analysis concluded that project-specific PM<sub>2.5</sub> emissions from overlapping construction and operational activities for the gas turbine control option component of the proposed project would be significant because the SCAQMD's operational significance threshold for PM<sub>2.5</sub> would be exceeded. However, PAR 1110.2 is part of a comprehensive ongoing regulatory program that includes implementing related SCAQMD 2007 AQMP control measures as amended or new rules to attain and maintain with a margin of safety all state and national ambient air quality standards for all areas within its jurisdiction. Only the compliance option that includes replacing all biogas engines with gas turbines would generate significant PM<sub>2.5</sub> emissions. No other compliance options would result in significant adverse regional air quality impacts for any criteria or precursor pollutants. Since no other compliance option exceeds any project-specific regional significance thresholds, they are not considered to be cumulatively considerable. Although the gas turbine compliance option would exceed the project-specific PM<sub>2.5</sub> operational significance threshold, it is also expected to generate 4,311 pounds of NO<sub>x</sub> reductions per day and 1,955 pounds of VOC reductions per day. Both NO<sub>x</sub> and VOCs are precursors to PM<sub>2.5</sub>. According to the 2007 AQMP, the NO<sub>x</sub> equivalency factor for PM<sub>2.5</sub> is 9.9 tons per day per ton of PM<sub>2.5</sub> and the VOC equivalency factor for PM<sub>2.5</sub> would be 23.0 tons per day per ton of PM<sub>2.5</sub>. This means that reducing one ton of NO<sub>x</sub> per day is equivalent to reducing 0.1 ton per day of PM<sub>2.5</sub> and reducing one ton of VOC is equivalent to reducing 0.04 tons per day of PM<sub>2.5</sub>. Therefore, the large reductions in NO<sub>x</sub> and VOC emissions from the gas turbines would more than make up for any increases in direct PM<sub>2.5</sub> emissions. Based on this rationale, PM<sub>2.5</sub> emissions from the gas turbine

scenario are not considered to be cumulatively considerable. Therefore, PAR 1110.2 would not be cumulatively significant for PM2.5.

Relative to GHGs, implementing PAR 1110.2 is expected to reduce CO2 emissions. Therefore, implementing PAR 1110.2 is not expected to generate significant adverse cumulative criteria or GHG air quality impacts.

As noted in the air toxics analysis, project-specific carcinogenic health risk from PAR 1110.2 can be mitigated to less than significant. Since air toxics create localized effects and no facilities regulated by PAR 1110.2 are within two miles of each other, implementing PAR 1110.2 is not expected to create significant adverse cumulative carcinogenic health risks.

Since the exemptions and increase in VOC and CO emission limits for new engines that were added after the Draft EA was circulated for public review were not determined to generate new project-specific adverse impacts, nor substantially increase the severity of adverse impacts that were already identified as significant; the new exceptions were not generate new cumulative adverse impacts or make adverse cumulative impacts already identified substantially worse.

**Cumulative Air Quality Impact Mitigation:** As indicated in the preceding discussion, no significant adverse cumulative air quality impacts were identified, therefore, no cumulative impact mitigation measures are required.

## Energy

### **Significance Criteria**

Impacts to energy resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable energy resources in a wasteful and/or inefficient manner.

### **New, Retrofit or Replacement Equipment for ICES**

An analysis was completed in the NOP/IS demonstrating that implementing PAR 1110.2 would not significantly adversely affect natural gas and electrical resources. However, based on comments received on the NOP/IS, potential adverse energy resources impacts from flaring and installing alternative technologies at biogas facilities instead of complying directly with PAR 1110.2 are analyzed in the following subsections.

PAR 1110.2 would require the construction and operation of control devices and monitoring equipment for both non-biogas and biogas facilities. The construction and operational phases would each have adverse energy impacts. Since construction and operation would overlap the concurrent effect of the construction and operational adverse impacts will be analyzed together.

## **Electricity Effects**

### **2005 Baseline**

The existing engines can be categorized as distributed generators and non-distributed generators. The non-distributed generators do not generate electricity for the facility at which they are located. These ICE instead produce work for pumps or compressors.

Distributed generators produce electricity for the facility at which they are located. Some distributed generators produce electricity for on-site activities. Others generate electricity for on-site activities; any additional energy is sold to the power grid.

The amount of electricity generated at existing facilities was estimated from the amount of fuel reported to the SCAQMD in the facility surveys. The total amount of electricity was estimated by the ratio of responses and the total number of PAR 1110.2 facilities in the SCAQMD permit database. Based on the SCAQMD inventory and survey data approximately 437,214 MW-hours per year were generated in 2005.

### **Construction**

SCAQMD staff assumed that all construction equipment would be diesel fuel. Therefore, there would be no additional electricity required. It is possible that welding may be performed with electricity from the power grid. However, because many of the existing engines are distributed generators, it is likely that electricity would not be available for construction. In addition, the electricity consumption for welders is expected to be small and short in duration. Therefore, no adverse electrical impacts are expected from construction of monitoring or control equipment.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, no new construction would be required. The increase in VOC and CO emission limits for new engines are not expected to alter the use of electricity in the construction of new diesel engine projects.

### **Operations**

#### **Non-biogas Add-on Control and Monitoring Equipment**

The additional monitoring and control equipment may require electricity from the existing ICE, ICE replacement or grid to operate. It was assumed that little electricity would be required for CO analyzers, AFRCs and add-on control equipment. CEMS systems were assumed to require 2.3 kW per CEMS. Based on this, approximately 511 MW-hours per year would be required for monitoring equipment.

#### **Biogas Add-on Control or ICE Alternative**

The proposed requirement to install CEMS systems on specified engines would be expected to increase demand for electricity. Based on the facilities survey, SCAQMD staff estimates that 56 MW-hr of electricity would be required to operate the additional CEMS systems.

Approximately 28 biogas facilities are expected to either need add-on control, such as SCR or NOxTech systems or to replace existing biogas ICEs with alternative technologies, such as turbines, microturbines, fuel cells, boilers, or LNG plants.

#### SCR, NOx Tech Control Technologies

SCR and NOxTech control technologies are expected to slightly reduce the efficiency of some ICEs due to pressure drops caused by the control devices and the need to use digester gas or natural gas to heat elements of the control technologies. The primary effect of this reduction in efficiency is a slight reduction in electricity production from affected ICEs. The electrical production losses (1,706 MWH per year) would be minor compared to alternative compliance options as explained in the following paragraphs.

#### Turbines, Microturbines, Fuel Cells and Boilers

Replacing ICEs with turbines, microturbines fuel cells and boilers would still allow operators at biogas facilities to generate electricity. Turbines, microturbines and boilers generate more waste heat than ICEs. Therefore, replacing ICEs with turbines, microturbines and boilers would reduce the amount of electricity generated. It is believed that most biogas facilities would be able to support gas turbines, microturbines, fuel cells or boilers; however, some digester gas facilities may not have the space (facility lot size) to support these ICE alternatives.

Electrical efficiency measures the amount of electrical energy produced per unit fuel energy input relative to the energy that is lost to heat or mechanical losses. Boilers are approximately 32 percent energy efficient. ICEs are approximately 31 percent energy efficient. Gas turbines are approximately 26 percent energy efficient and microturbines are approximately 23 percent energy efficient. Since turbines and microturbines are the least energy efficient option and the actual amount of space at digester gas facilities is unknown, turbines and microturbines would represent the “worst-case” loss of electricity production from removing ICEs at biogas facilities. There would be a 57,161 MWH per year reduction in electricity from gas turbines, and a 101,013 MWH per year reduction in electricity from microturbines.

#### Biogas to LNG Facilities

The existing LNG plant at the Bowerman Landfill includes ICEs to supply electricity to the facility. However, since it is assumed that LNG plants would be an alternative to complying with PAR 1110.2, it was assumed that LNG plants would obtain electricity from the power grid to operate the LNG plants. Therefore, since the ICEs would be removed and electricity would be supplied from the power grid, SCAQMD staff assumes that all electricity production from facilities installing biogas to LNG facilities is lost. The landfill gas would be treated and used off-site as fuel for another system or process. The existing Bowerman Landfill will sell the LNG to the Orange County Transit Authority. Similarly, affected facilities that chose to replace ICEs with LNG plants are expected to sell the LNG for fuel in other processes. Therefore, biogas-to-LNG facilities are expected to generate a new source of LNG that could be used in place of more polluting fuels such as diesel or gasoline.

As noted in the “Air Quality” analysis section, LNG plants require substantial area because of the size and number of components needed to collect, scrub and cool biogas into LNG.



Not all biogas facilities have enough space to support an LNG plant. The analysis of the effects of replacing ICEs with LNG plants includes the following assumptions. Only landfill gas facilities are assumed to have enough area to allow installation of an LNG plant.

The differences in electricity production between the existing ICEs and ICE alternatives are presented in Table 4-50. These differences are based on differences in efficiencies between ICE alternatives and the existing ICEs.

New Exceptions and Increases in VOC and CO Emission Limits for New Engines

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, new adverse electricity impacts would be generated. The increase in VOC and CO emission limits for new engines would not affect the use of electricity; therefore, not new adverse electrical impacts are expected.

**Total Electricity Adverse Impacts**

Table 4-51 presents the energy production and usage for ICEs retrofitted with applicable control technologies to comply with PAR 1110.2 and for replacing ICEs with alternative technologies. All alternative generate less electricity than the existing ICEs because they are less efficient than ICEs. Biogas-to-LNG plants would not generate any electricity but received electricity from the power grid. However, biogas-to-LNG plants would generate renewable LNG (See Renewable Energy below). Therefore, any compliance option would reduce the total amount of renewable electricity available to the grid.

**Table 4-47  
Adverse Electricity Impacts from Differences in Efficiency between ICE Alternatives and LNG Reliance on the Power Grid**

Description	Electricity Production, MWH/yr	Electricity Consumption, MWH/yr	Total Electricity, MWH/yr	Reduction in Electricity from Baseline, MWH/yr
2005 Baseline (ICE)	437,214		437,214	
SCR	435,509		435,509	1,706
Gas Turbines	380,053		380,053	57,161
Microturbines	336,201		336,201	101,013
Gas Turbines/LNG	155,746	104,694	51,052	386,162
Microturbines/LNG	137,706	104,694	33,081	404,133

ICEs, gas turbines, and microturbines generate electricity. LNG plants would not generate electricity, but would require energy from the power grid.

**Table 4-48  
Total Adverse Electricity Impacts from PAR 1110.2**

Description	Non-Biogas and Biogas CEMS and Controllers, MWH/Yr	Non-Biogas Electrification, MWH/Yr	Electricity Production, MWH/yr	Electricity Totals, MWH/yr	Reduction in Electricity from Baseline,, MWH/yr
2005 Baseline			437,214	437,214	0
SCR	(567)	(171,827)	435,509	263,114	(174,100)
Gas Turbines	(567)	(171,827)	380,053	207,659	(229,556)
Microturbines	(567)	(171,827)	336,201	163,807	(273,408)
Gas Turbines/LNG	(567)	(171,827)	51,052	(121,342)	(558,557)
Microturbines/LNG	(567)	(171,827)	33,081	(139,313)	(576,527)

Negative values are presented in parenthesis. Negative electricity values represent consumption, positive values represent production.

According to the Final Program EIR for the 2007 AQMP, 120,194 GW-hours per year were available in southern California in 2002. Table 4-51 shows that 576,527 MW-hour per year would be consumed in a worst-case. A 576,527 MW-hour per year reduction is 0.48 percent of 120,194 GW-hour per year. Since the worst-case PAR 1110.2 scenario would reduce the total amount of electricity available by less one percent, it is not significant for adverse total electricity impacts.

## **Natural Gas Effects**

### **2005 Baseline**

The baseline amount of natural gas of approximately 10,501,630 MMBtu per year (10,028,802 MMBtu per year at non-biogas facilities and 472,828 MMBtu per year at biogas facilities) was estimated from the amount of natural gas use reported in the facility surveys. This information was multiplied by the ratio of total number of Rule 1110.2 facilities to the number of facilities that completed the survey.

### **Construction**

SCAQMD staff assumed that all construction equipment would be diesel fuel. Therefore, there would be no additional natural gas required.

### **Operations**

#### ***Non-biogas Add-on Control and Monitoring Equipment***

The addition of three way catalyst is expected to result in a pressure drop. The pressure drop would result in an increase in natural gas usage. SCAQMD staff assumed a one-inch pressure drop in the exhaust of an ICE with three way catalyst. The increase in natural gas consumption caused by monitoring equipment is expected to be negligible. Approximately 2,713 MMBtu per year would be consumed because of increased pressure loss.

#### ***Limitation of Natural Gas Use on Biogas Engines***

PAR 1110.2 would eliminate the efficiency correction factor in 2012. However, between the date of adoption and July 1, 2012, PAR 1110.2 would allow the use of the efficiency

correction factor for facility operators who operate engines using 90 percent or more landfill or digester gas. SCAQMD staff expects that most digester gas generators rated greater than 500 bhp would reduce natural gas used to less than 10 percent upon adoption of the rule in 2008 in order to use the efficiency factor. In 2010, the concentration limits for engines comprised of greater than 10 percent biogas would become effective. Biogas engines that use 10 percent or more natural would need to either reduce natural gas to less than 10 percent or meet the 2010 concentration limits. SCAQMD staff expects that the remaining digester gas ICE rated greater than 500 bhp would reduce to less than 10 percent to remain subject to the biogas concentrations. Operators of biogas engines are not expected shut down their engines because of the 90 percent or more landfill or digester gas requirement in subparagraph (d)(1)(B) for the following reasons:

Based on the survey of affected engines conducted by staff, operators of 24 of 26 landfill gas engines use no natural gas. Operators of the remaining two engines use 12 percent natural gas and could reduce this amount to less than 10 percent. Operators of 11 of 27 digester gas engines were reported to use less than 10 percent natural gas. Three more have recently reduced natural gas usage to less than 10 percent. Eleven of the 13 remaining digester gas engines that use more than 10 percent natural gas generate electricity, which means they can either limit their natural gas usage or petition to use a higher percentage of natural gas, if qualified. Operators of the remaining two engines, which drive compressors, may also be eligible to petition for a higher percentage of natural gas usage than 10 percent if they demonstrate that using 10 percent or less natural gas would result in flaring the biogas.

However, while the natural gas will likely be reduced until 2012, SCAQMD staff expects that facility operators will return to the original natural gas consumptions after 2012, since the biogas efficiency correction factor will be eliminated at that time. The reduction of natural gas usage to 10 percent is presented in Table 4-49.

**Table 4-49  
Reduction of Natural Gas Usage to 10 Percent between 2008 and 2012**

Year	Baseline Natural Gas Usage, MMBtu/year	2008 Natural Gas Reduction, MMBtu/year	2010 Natural Gas Reduction, MMBtu/year
2008	4,061,047	162,928	77,761
2010	4,964,605	199,179	95,063

#### ***Biogas Add-on Control or ICE Alternative***

Approximately 28 biogas facilities are expected to either need add-on control, such as SCR or NOxTech systems or to replace existing biogas ICEs with alternative technologies, such as turbines, microturbines, fuel cells, boilers, or LNG plants.

SCAQMD did not expect a change in the usage of natural gas between the biogas compliance options, except for LNG plants, which are not expected to need natural gas.

The exceptions added after the Draft EA was circulated for public review would allow affected engines to use existing levels of natural gas during emergencies and certain weather

conditions; therefore, no new natural gas usage is expected. The new VOC and CO limits for new DG engines are not expected to increase the amount of natural gas needed.

### ***Emergency Generators***

#### **Non-biogas Emergency Generators**

There would, however, be a reduction in natural gas usage if facility operators replace ICES with electric motors. As noted in the analysis of potential air quality impacts from implementing PAR 1110.2, it was assumed that operators of 169 engines at non-biogas facilities would choose to replace their existing engines with electric motors. Staff assumed that 40 percent of these operators would choose to use their existing natural gas engines as emergency backup engines. If 169 non-biogas ICES are replaced by electric motors, it is estimated that natural gas usage would be reduced by approximately 1,854,358 MMBtu per year. Approximately 1,303,214 MMBtu per year would be consumed at power plants to generate electricity for the 169 existing ICES that would be assumed to be replaced with electric motors. If 40 percent of the 169 existing ICES use existing natural gas engines for emergency backup, an additional 2,283 MMBtu per year would be needed. A summary of natural gas consumption and reduction associated with non-biogas ICE replacement with electric motors is presented in Table 4-53.

**Table 4-50**  
**Natural Gas Consumption and Reduction Associated with Non-biogas ICE Replacement with Electric Motors**

<b>Natural Gas Reduction from ICE Replacement with Electric Motors, MMBtu/year</b>	<b>Power Plants Natural Gas Consumption, MMBtu/year</b>	<b>Emergency ICE Natural Gas Consumption, MMBtu/year</b>	<b>Electrification Natural Gas Consumption, MMBtu/year</b>
(1,854,358)	1,303,214	2,283	(548,862)

Values in parentheses are negative. Reduction in natural gas use is negative, consumption is positive

#### **Biogas Emergency Generators**

Facility operators that place add-on controls are not expected to need emergency generators because of PAR 1110.2. SCAQMD staff assumed that facility operators might install emergency generators if existing engines were replaced with ICE alternatives. SCAQMD staff assumed that only digester gas facility operators would install emergency generators, since pumps and compressors would be required to be operated continuously. SCAQMD staff assumes that landfill operators would flare landfill gas during emergencies to prevent explosions. In a worst-case (microturbines at all digester plants) approximately 5,023 MMBtu per year of natural gas would be consumed in biogas emergency generators.

### **Total Natural Gas Impacts**

With the replacement of existing non-biogas ICES with electric motors, PAR 1110.2 would result in an overall reduction in natural gas consumption. The reductions for the proposed project by biogas compliance option are present in Table 4-54.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, new adverse natural gas impacts would be generated. The increase in VOC and CO emission limits for new engines is not expected to affect the use of natural; therefore, no new adverse natural gas impacts are expected.

### **Diesel Fuel Effects**

#### **2005 Baseline**

With the exception of 30 diesel-fueled ICE, the majority of the stationary ICEs subject to PAR 1110.2 are natural gas, biogas or field gas fueled. The 30 diesel fueled ICEs consume approximately 6,363,500 gallons of diesel fuel per year.

#### **Construction**

SCAQMD staff assumed that all construction equipment would be diesel fueled. In addition to the construction equipment, delivery and haul trucks would bring supplies and equipment and remove old equipment. The maximum amount of diesel used per day in construction equipment would be 1,761 gallons per day under the biogas compliance options where digester gas facility operators replace ICEs with either turbines or microturbine and landfill gas facility operators replace ICES with LNG plants. The maximum amount of diesel used for construction vehicle travel would be 232 gallons per day for the same scenario.

**Table 4-51  
Total Adverse Natural Gas Impacts**

Description	Catalyst Pressure Drop Consumption, MMBtu/yr	Non-biogas Electrification Natural Gas Consumption, MMBtu/yr	Biogas Emergency Engines Natural Gas, MMBtu/yr	Power Plant Natural Gas, MMBtu/Yr	Biogas Natural Gas Consumption, MMBtu/yr	Non-biogas Natural Gas Consumption, MMBtu/yr	Natural Gas Total, MMBtu/yr	Natural Gas Change from Baseline, MMBtu/yr
Baseline					512,787	10,501,630	11,014,417	
SCR	2,713	(548,862)		1,751	512,787	10,501,630	10,470,019	(544,398)
Gas Turbines	2,713	(548,862)	3,318	68,793	512,787	10,501,630	10,540,378	(474,039)
Microturbines	2,713	(548,862)	5,023	112,645	512,787	10,501,630	10,585,936	(428,481)
Gas Turbines/ LNG	2,713	(548,862)	3,318	397,794	456,430	10,501,630	10,813,022	(201,395)
Microturbines/ LNG	2,713	(548,862)	5,023	415,764	456,430	10,501,630	10,832,698	(181,719)

Values in parentheses are negative. Reduction in natural gas use is negative, consumption is positive

## **Operation**

### **Vehicle Traffic**

Diesel fuel would be consumed by source testing trips, trucks delivering catalysts, ammonia, etc., hauling away spent carbon and catalyst, and trucks hauling LNG offsite to customers. The amount of diesel fuel usage was estimated by the number of affected facilities or material delivered. Diesel fuel use from truck trips associated with PAR 1110.2 are presented in Tables 4-55 through 4-59. Detailed calculations can be found in Appendix C.

### **Diesel Emergency Generators**

An indirect effect of facility operators replacing existing natural gas engines with electric motors and replacing biogas engines with alternative technologies would be the installation of diesel emergency engines to provide power to necessary operations during power failures in the electricity supply grid. Emergency engines were assumed to operate up to 50 hours per year based on testing (maximum allowed per Rule 1470). For this analysis, it was assumed that the brake horsepower rating of the emergency engines installed would be based on increased grid dependence in the case of digester gas generators or would be equivalent to the brake horsepower rating of the existing digester or natural gas work (pump or compressor) engine replaced. The worst-case biogas scenario would require 202 gallons per day of diesel fuel for emergency engines for microturbines used for digester gas facilities and 1,111 gallons per day for emergency generators at non-biogas facilities. Diesel emergency engine ICE fuel consumption is presented in Tables 4-52 through 4-56.

### **Total Diesel Fuel Adverse Impacts**

SCAQMD staff estimates that a maximum of 3,218 gallons of diesel might be consumed per day. The 2007 AQMP states that 10 million gallons of diesel is consumed per day in California. Three thousand, two hundred and eleven gallons of diesel is less than one percent of the 10 million gallons of diesel used in California (0.02 percent). Therefore, the increase in diesel consumption caused by PAR 1110.2 would not be significant. Diesel fuel use from PAR 1110.2 is presented in Tables 4-55 through 4-59. Detailed calculations can be found in Appendix C.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, new adverse diesel impacts would be generated. The increase in VOC and CO emission limits for new engines would not affect the use of diesel; therefore, no new adverse diesel impacts are expected.

## **Renewable Energy**

### **Flaring**

Representatives of the Landfill Gas to Energy Coalition stated that the cost of installing SCR control equipment to comply with the proposed NO<sub>x</sub> concentration limits would make flaring gas more economically appealing than installing SCR. They stated further that if the ICEs were removed and landfill gas was flared, PAR 1110.2 could adversely affect California's renewable energy goals.

**Table 4-52**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas Facilities and the SCR**  
**Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24	267	9	0	300
2009	20	279	6	65	370
2010	28	373	54	760	1,214
2011	44	653	63	1,111	1,871
2012	8	141	86	1,111	1,346
2014	0	0	149	1,111	1,260
Max	44	653	149	1,111	1,871

HHDT = Heavy – heavy- duty truck

**Table 4-53**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas Facilities and the Gas**  
**Turbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24	267	9	0	0	300
2009	20	367	6	65	0	458
2010	28	373	54	760	0	1,214
2011	44	653	57	1,111	0	1,865
2012	8	141	86	1,111	0	1,346
2014	0	0	149	1,111	140	1,399
Max	44	653	149	1,111	140	1,865

HHDT = Heavy – heavy- duty truck



**Table 4-54**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas Facilities and the**  
**Microturbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24.0	267	9.0	0	0	300
2009	20.0	367	6.0	65	0	458
2010	28.0	373	53.6	760	0	1,214
2011	44.0	653	56.6	1,111	0	1,865
2012	8.0	141	86.4	1,111	0	1,346
2014	0.0	0	149	1,111	202	148.8
Max	44	653	149	1,111	202	1,865

HHDT = Heavy – heavy- duty truck

**Table 4-55**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas Facilities and the LNG and**  
**Gas Turbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24	267	9	0	0	300
2009	20	279	6	65	0	370
2010	28	373	54	760	0	1,214
2011	236	1,761	111	1,111	0	3,218
2012	200	1,249	154	1,111	0	2,714
2014	0	0	281	1,111	140	1,531
Max	236	1,761	281	1,111	140	3,218

HHDT = Heavy – heavy- duty truck

**Table 4-56**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas Facilities and the LNG and Microturbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational, gal/day	Non-Biogas Emergency Engines, gal/day	Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24.0	267	9.0	0	0	300
2009	20.0	279	6.0	65	0	370
2010	28.0	373	53.6	760	0	1,214
2011	236	1,761	111	1,111	0	3,218
2012	200	1,249	154	1,111	0	2,714
2014	0.0	0	281	1,111	202	1,593
Max	236	1,761	281	1,111	202	3,218

HHDT = Heavy – heavy- duty truck

In response to the Landfill Gas to Energy Coalition’s concerns PAR 1110.2, staff has incorporated as part PAR 1110.2 a requirement to perform a technology assessment July 1, 2010 to evaluate the availability of cost effective compliance options for operators of ICEs at landfill gas and digester gas facilities. The technology assessment would evaluate whether available control technologies in 2010 would reduce NOx, VOC, and CO emissions to the concentration limits in PAR 1110.2 by July 1, 2012. If the assessment shows a potential for replacing ICEs with continuous flaring or that cost-effective control technology is not available for biogas engines, staff will return to the Governing Board with a proposal to address any new significant adverse impacts.

PAR 1110.2 includes an alternative compliance limit in subparagraph (d)(1)(B) for operators of engines that operate on 90 percent or more of landfill or digester gas effective July 1, 2012. Further, at the request of the affected industry, staff has added a provision allowing operators of engines to operate on less than 90 percent landfill or digester gas if the only alternative would be shutting down and flaring the landfill or digester gas. This concentration limits for engines burning 90 percent or more landfill or digester gas is also subject to the technology review provision that has been added to PAR 1110.2. Based on these new provisions added to PAR 1110.2 additional flaring beyond existing conditions is not anticipated as a result of implementing PAR 1110.2.

### **Renewable Electricity and Fuel**

In-state electricity from biomass represents almost two percent of the total electricity capacity in California. Of this two percent, approximately 33 percent, or 0.66 percent, of electricity produced from biomass is produced from the combustion of landfill and biogas. In Executive Order S-06-06 Governor Schwarzenegger targeted the state to meet a 20 percent target for biomass within the established state goals for renewable generation by 2010, that is, electricity from biomass should contribute 20 percent of the state’s goal for 20

percent renewable electricity. Senate Bill 1078 (SB 1078, Sher, Chapter 516, Statutes of 2002) established the California Renewables Portfolio Standard (RPS) program, which requires an annual increase in renewable generation by the utilities equivalent to at least one percent of sales, with an aggregate goal of 20 percent by 2017. The PUC accelerated the goal, requiring the utilities to obtain 20 percent of their power from renewable sources by 2010 (Senate Bill 107 codified this goal in state law).

The CEC states that statewide, 305 MW are available from landfill gas operations and 68 MW from digester gas operations in California. Based on 974 MW of total biomass electrical capacity in the state, landfill gas operations could provide 31 percent of the total potential biomass electrical capacity and digester operations could provide seven percent of the total potential biomass electrical capacity.<sup>27</sup> The total potential biomass electrical capacity is the amount of electricity available from all existing and future biomass sources. The term “potential” is used because not all of the sources may be converted to electricity producing sources. As part of the potential feedstock energy in biomass for California in 2006, wastewater was two percent and landfill gas was eleven percent of the 507 trillion Btu per year.

Since a goal of the technology analysis under PAR 1110.2 would be to prevent flaring of natural gas and SCAQMD staff believes that facilities operators will either use add-on control or replace ICEs with alternative technologies that would either generate electricity or LNG; there would be only adverse impacts from efficiency losses between the existing ICEs and the ICEs with add-on control or ICE replacement technologies. If the assessment shows a potential for replacing ICEs with continuous flaring or that cost-effective control technology is not available for biogas engines, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. The efficiency losses are reported in Table 4-47. The largest renewable energy electrical loss because of differences in efficiency would be 101,013 MW-hours per year for the microturbine compliance option.

Southern California Edison reports that electricity from biomass and waste is projected to be two percent in 2007, which is equivalent to the actual power mix in 2006. LADWP projects electricity from biomass and waste to be one percent in 2007. The state power mix from biomass and waste was less than one percent in 2005.

There may be adverse energy impacts from an individual government program, but any energy losses caused by PAR 1110.2 other than from efficiency losses from one program (e.g., RPS electricity) would be made up in another program (e.g., biofuel). The RPS program focuses only electricity sold on the power grid. The program also allows up to 25 percent of natural gas to be reported as renewable biogas. For example, a facility operator might use 25 percent natural gas, and all of the electricity generate from the 25 percent natural gas might be sold to the power grid. If the facility operator then reduces the amount of natural gas to 10 percent, then the facility might report to the state that there was a reduction of renewable electricity equivalent to the 15 percent natural gas (25 percent – 10 percent). In reality, no renewable biogas electricity has been loss, only the electricity loss

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<sup>27</sup> Table 2.1, CEC, A Preliminary Roadmap for the Development of Biomass in California, CEC-500-2006-095-D, December 2006.

from natural gas that was allowed to be reported as natural gas was loss. In addition, SCAQMD staff expects that facilities that use more than 10 percent natural gas would resume using the same amount used pre-PAR 1110.2 after 2012 when the concentration requirements for both the non-biogas and biogas become the same.

Another example of this would be if a biogas facility operator replaces an existing ICE with a LNG plant. The facility operator might report to under the state RPS program that after the replacement that the facility no longer produces electricity from biogas. However, while the facility operator would not generate electricity, the facility operator would generate LNG to be used in replacement of gasoline or diesel.

### **New Exceptions and Increases in VOC and CO Emission Limits in New Engines**

The new exceptions would allow the existing use of natural gas during emergencies and certain weather conditions. The new exemptions are not expected to affect the use of renewable energy. Therefore, the exceptions would not decrease natural use between 2008 and 2011. The increase in VOC and CO emission limits in new engines is not expected to alter the use of renewable or natural gas. Therefore, the new exemptions and increases in VOC and CO emission limits for new engines are not expected to make new adverse renewable energy impacts.

### **Total Renewable Energy Affects**

Therefore, based on the above analysis, PAR 1110.2 would not generate any adverse impacts for energy. PAR 1110.2 includes a technology assessment that will include the goal of preventing adverse energy impacts from becoming significant. If the assessment shows a potential for replacing ICEs with continuous flaring or that cost-effective control technology is not available for biogas engines, staff will return to the Governing Board with a proposal to address any new significant adverse impacts.

### **Project Specific Mitigation Measures:**

PAR 1110.2 is not designed to cause facilities to stop electric generation, but to reduce NO<sub>x</sub>, CO and VOC from ICEs. However, the cost of control and monitoring technology along with other business and economic factors may spur affected facility operators to remove ICEs and install alternative technologies. SCAQMD staff will conduct a technology assessment in 2010 to prevent affected facility operators from flaring biogas rather than using it for electricity or biofuel production. By preventing continuous flaring SCAQMD staff will prevent the loss of renewable energy in both electricity and biofuel form.

### **Remaining Energy Impacts:**

The proposed project does not have any significant adverse energy impacts. A technology assessment will be completed in 2010 to verify that feasible control options are available to comply with PAR 1110.2 to prevent replacing biogas ICEs with continuous biogas flaring. If the technology assessment shows potential for flaring or that feasible control options for biogas engines are not available, staff will return to the Governing Board with a proposal to address any new significant adverse impacts, including rule changes if needed. Therefore, there would be no significant adverse energy impacts from PAR 1110.2.

**Cumulative Energy Impacts:**

Since PAR 1110.2 would not have project specific adverse impacts to energy, it would not have cumulative impacts.

**Cumulative Energy Impact Mitigation:**

Since there are no cumulative energy impacts no mitigation is required.

**Hazards and Hazardous Materials**

Accidental releases of aqueous ammonia used to reduce NO<sub>x</sub> emissions in SCR control technologies were examined in the following subsections. The analysis also evaluates accidental releases of LNG in scenarios where operators choose the alternative compliance option of replacing their ICEs with biogas to LNG plants. Since operators who retrofit existing ICEs with SCRs would not produce LNG and, conversely, facility operators who replace ICEs with biogas to LNG plants would not install SCR, the adverse impacts from accidental release from these materials would not occur at the same facility.

**Significance Criteria**

Impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels. ERPG-2 concentrations are the maximum airborne concentration below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair their ability to take protective action.

**Aqueous Ammonia**

Only biogas facilities would need SCR. All non-biogas, non-RECLAIM, lean-burn ICEs meet BACT. Existing, non-biogas, RECLAIM, lean-burn ICEs are exempt from NO<sub>x</sub> requirements in Rule 1110.2 and PAR 1110.2. One compliance option for operators of biogas facilities to comply with the NO<sub>x</sub> concentration requirement of PAR 1110.2 would be to install SCR or NO<sub>x</sub>Tech systems at the 28 affected biogas facilities. As stated in the NOP/IS SCAQMD policy prohibits the use of anhydrous ammonia as a component in air pollution control technologies because it is considered to be an acutely hazardous material; in the event of an accidental release, ammonia will travel passively with prevailing winds as a dense gas; and can result in exposures that substantially exceed ERPG 2 levels. To further reduce potential hazards associated with exposure to ammonia in the event of an accidental release, a condition on SCAQMD permits is typically required that limits the aqueous ammonia concentration to 19 percent. The reason SCAQMD permits typically limit the concentration of aqueous ammonia to 19 percent is the fact that, in the event of an accidental release, it does not travel as a dense gas like anhydrous ammonia; is not on any hazardous material lists, like aqueous ammonia with higher concentrations; and, is less likely to

evaporate and produce concentrations that exceed the ERPG 2 level used by the SCAQMD as a significance threshold.

Ammonia gas can cause severe eye damage, pulmonary edema, inflammation and edema of the larynx and death from spasm. Inhalation can cause wheezing, shortness of breath and chest pain. Inhalation of ammonia vapor can cause burns to the respiratory tract and residual chronic bronchitis. Chronic obstructive pulmonary disease can develop as a consequence of fibrous obstruction of the small airways. Exposure to the eyes can cause tearing, inflammation, and irritation to temporary or permanent blindness.<sup>28</sup>

Hazards due to transport of ammonia were evaluated in the NOP/IS. The NOP/IS concluded that PAR 1110.2 did not have the potential to create significant adverse ammonia transport impacts. No comments were received disputing this conclusion, so this topic will not be discussed further.

### **Hazards Due to Rupture**

The ERPG 2 concentration level for ammonia is 150 ppm. Exposures to concentrations equal to or exceeding this concentration will be considered significant. “Worst-case” atmospheric conditions (e.g., low winds and stable air) will be used to evaluate whether accidental release concentrations exceed the ERPG-2 and ERPG-3 levels.

Affected operators who choose to retrofit existing ICEs with SCR or NOxTech systems would likely need to install ammonia storage tanks. Based on considerations like available area, amount of ammonia needed per year, etc., SCAQMD staff assumed that the largest ammonia tank installed to comply with PAR 1110.2 would be 5,000 gallons. Due to local fire department safety regulations, storage tanks constructed at affected facilities would be surrounded by secondary containment designs (e.g., dykes, berms, etc.). These same containment facilities would be provided at truck loading racks to contain ammonia in the event of a spill during transfer of ammonia from the truck to the storage tank.

The worst-case release scenario would be a catastrophic storage tank failure. The rupture of an ammonia storage tank would release the ammonia into the secondary containment area. Ammonia would then form a liquid pool in the secondary containment area and evaporate.

A modeling analysis was performed based on EPA's RMP Guidance for worst-case estimates for toxic releases and explosions. The RMPComp model was used to calculate the size of the impact zones. The EPA endpoint for ammonia exposure is the distance from the spill that is required to reduce the concentration to 0.14 micrograms per liter, the ERPG 2 endpoint for ammonia. The RMPComp program estimates were based on 20 percent aqueous ammonia, which is slightly higher concentration than the 19 percent ammonia proposed for this project. The 20 percent concentration is built into RMPComp and was the closest concentration available for use by the model.

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<sup>28</sup> Technical Support Document: Toxicology Clandestine Drug Labs: Methamphetamine Volume 1, Number 1, Ammonia, [http://www.oehha.ca.gov/public\\_info/pdf/TSD%20Ammonia%20Meth%20Labs%2010'8'03.pdf](http://www.oehha.ca.gov/public_info/pdf/TSD%20Ammonia%20Meth%20Labs%2010'8'03.pdf)

To provide a “worst-case” case analysis for all ammonia tank release scenarios, the following assumptions were made:

- Ammonia tank dimensions were assumed to be twice as wide as they were high;
- The ammonia tank volume was assumed to be 10 percent larger than the nominal containment volume. (For a tank with 5,000-gallon contents, the tank volume was assumed to be 5,500 gallons);
- All dike areas were assumed to have excess capacity of 20 percent more than the tank contents. (The dike capacity for 5,000-gallon contents was assumed to be 6,000 gallons);
- All dike walls were assumed to be three feet high;
- For unconfined ammonia spills, the liquid was assumed to spread to a thickness of one centimeter in all directions on a flat impervious surface;
- Rural conditions were conservatively assumed to reduce dispersion.

Based on these assumptions, RMPComp estimates that the toxic endpoint would be 0.1 mile (528 feet) from the ammonia tank. Since biogas engines typically have back-up flare systems, it is assumed that the ICEs are not placed close to the property boundaries. However, based on a survey of biogas facilities, it was found that several facilities would have biogas engines within 0.1 mile of the property line. Therefore, it is expected in the event of an accidental release of ammonia from an ammonia storage tank at affected facilities, offsite receptors could be exposed to ammonia concentrations exceed the ERPG 2 for ammonia, 150 ppm.

According to the American Institute of Chemical Engineers (AIChE) Center for Chemical Process Safety<sup>29</sup>, the mean time to catastrophic failure for a metallic storage vessel at atmospheric pressure is 0.985 per million hours (approximately once per 112 years). For aqueous ammonia tanks used at power plants, the California Energy Commission concluded that the catastrophic failure of an aqueous ammonia storage tank is an extremely unlikely event because the probability of a complete tank failure is insignificant, and the risk of failure due to other causes such as external events and human error also is insignificant.<sup>30</sup> In addition, SCAQMD staff is not aware of any aqueous ammonia storage tank that has had a catastrophic failure in recent history. As a result, the likelihood of a rupture of the aqueous ammonia storage tank occurring is extremely low. In spite of this, however, hazard impacts from exposure to ERPG 2 concentrations of ammonia are considered to be significant.

### **Liquefied Natural Gas**

Operators who choose to replace their existing ICEs with biogas to LNG plants would also need to install LNG storage tanks to store LNG until loaded into delivery trucks. Both the storage tank and the delivery trucks would have the potential for accidental release.

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<sup>29</sup> AIChE, 1989.

<sup>30</sup> CEC, 1999

Hazards associated with LNG are that, under certain conditions, it may explode or catch on fire. LNG is not explosive or flammable in unconfined areas.<sup>31</sup> However, as it warms and expands to a gas it becomes flammable at a concentration between five and 15 percent.

LNG is comprised mostly of methane, but may contain ethane, propane and other heavier hydrocarbons. There are no known health effects from methane except for asphyxia. Asphyxia is the condition of severely depleting the oxygen supply to the body. Methane causes asphyxia by displacing oxygen in air. Asphyxiation can occur when oxygen concentrations drop below 18 percent. Oxygen is displaced to 18 percent at a concentration of 14 percent methane. Unconsciousness from central nervous system depression occurs at 30 percent methane.

Effects of oxygen deficiency are:<sup>32</sup>

12-16 percent	Breathing and pulse rate are increased, with slight muscular incoordination;
10-14 percent	Emotional upsets, abnormal fatigue from exertion, disturbed respiration;
6-10 percent	Nausea and vomiting, inability to move freely, collapse, possible lack of consciousness;
Below 6 percent	Convulsive movements, gasping, possible respiratory collapse and death.

It is unlikely that off-site receptors would be exposed to LNG concentrations that would generate adverse health effects, because the lower explosive limit (LEL) for methane is five percent (50,000 ppm). The LEL is the concentration at which there is enough of the given gas to ignite or explode.

The methodology used for estimating the potential risk from a vapor explosion is that developed for off-site consequence analysis for the Risk Management Program (RMP) under 40CFR68 (EPA, 1999). For an RMP off-site consequence analysis, a gaseous release is assumed to produce a vapor explosion that results in a blast impact. For a vapor explosion, the significance level is a pressure wave (blast) of one pound per square inch (psi) and the metric examined is the modeled distance to the significant overpressure level.

### **Hazards Due to Transport**

The transport of LNG is regulated by the US Department of Transportation. LNG trucks are double-walled aluminum and are designed to withstand accidents during the transport of LNG. The following description of LNG transportation and consequences is taken from the Federal Motor Carrier Safety Administration (FMCSA).<sup>33</sup>

<sup>31</sup> Federal Energy Regulatory Commission, <http://www.ferc.gov/o12faqpro/default.asp?Action=Q&ID=470>

<sup>32</sup> Canadian Centre for Occupational Health and Safety, [http://www.ccohs.ca/oshanswers/chemicals/chem\\_profiles/methane/health\\_met.html](http://www.ccohs.ca/oshanswers/chemicals/chem_profiles/methane/health_met.html)

<sup>33</sup> Federal Motor Carrier Safety Administration, Comparative Risks of Hazardous Materials and Non-Hazardous Materials Truck Shipment Accidents/Incidents, Final Report, March 2001, [www.fmcsa.dot.gov/documents/hazmatriskfinalreport.pdf](http://www.fmcsa.dot.gov/documents/hazmatriskfinalreport.pdf).



LNG is loaded into delivery tanks at atmospheric pressure, which would be at its boiling point of -260°F (-162°C). The LNG is maintained at this temperature by evaporation of the boiling LNG and venting of the evaporated LNG. Because the vent is closed during shipment, the pressure in the tank builds and the temperature of the LNG increases. The FMCSA analyzed releases from delivery tanks with an average pressure of 30 psig, which would be -230°F (-146°C). At 30 psig, approximately 30 percent of the LNG will flash into vapor when released.

There are four scenarios that can have major consequences:

1. Release of LNG into a pool that evaporates and disperses without ignition. Approximately 40 percent of the liquefied LNG immediately flashes into vapor. The temperature of the liquid pool would be -44 °F (-42°C) and would therefore damage exposed vegetation and people.
2. A flammable cloud is formed that contacts an ignition source. The flame front can flash back and set the liquid pool on fire. Quantities of LNG shipped by truck would not typically cause vapor cloud explosions.
3. A boiling liquid expanding vapor explosion (BLEVE) occurs. BLEVEs would occur when an LNG tank is exposed to fire and the increase in pressure within the tank exceeds the capacity of the relief valve.
4. The tank ruptures, rockets away and ignites.

RMPComp was used for the consequence analysis for these four scenarios. The adverse impacts from the four scenarios are:

1. The area of the pool was estimated by assuming a depth of one centimeter as described in Example 29 in the EPA's Risk Management Program Guidance for Offsite Consequence Analysis.<sup>34</sup> A 6,000 gallon LNG pool would be 24,448 square feet. This distance would be a "worst-case" since as the LNG pool expands from the tank it will warm and evaporate.
2. A pool fire of 6,000 gallons that is released in one minute would result in a heat radiation endpoint (five kilowatts/square meter) of 0.2 mile. If a vapor cloud fire occurs, the estimated distance to the lower flammability limit would be 0.3 mile.
3. Based on 10,000 gallons the BLEVE would result in a fireball that may cause second-degree burns out to 0.3 mile.
4. The "worst-case" release estimate for 10,000 gallons in RMP\*Comp is 0.3 mile from the vapor cloud explosion. Since, it is unclear as to how far away the tank would travel, it was assumed that the adverse impact would be 0.3 mile from where the tank lands. Damage to property and persons may occur from physical impact from the rocketing tank.

Because sensitive receptors may be within the endpoints above, PAR 1110.2 would be significant for hazards from accidental release of LNG during transport.

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<sup>34</sup> EPA, Risk Management Program Guidance for Offsite Consequence Analysis, EPA 550-B-99-009, April 1989.

### **Hazards Due to Rupture**

A “worst-case” analysis was completed for a typical LNG storage tank. Based on the landfill gas reported in the facilities survey, and based on design of the LNG facility at the Bowerman Landfill<sup>35</sup>, the largest LNG tank would be 71,000 gallons. All LNG tanks were assumed to have a berm that holds ten percent more LNG than the storage tanks. RMP\*Comp estimates the overpressure from a catastrophic release of 71,000 gallons of LNG with a berm to be 0.2 mile. Since it was determined that several facilities have engines within 0.1 mile of the property line, PAR 1110.2 would be significant for hazards from accidental release of LNG from a storage tank.

### **Ammonia/LNG Hazards to Schools**

SCAQMD staff has geocoded biogas facilities. No biogas facilities are within one-quarter mile of a school. Based on the analysis in the “Air Quality” Section, PAR 1110.2 would reduce NO<sub>x</sub>, CO, and VOC emissions from ICEs. However, ICEs at biogas facilities that are retrofitted with SCR could generate ammonia emissions. Biogas LNG plants may have the potential to affect schools in the event of an explosion.

RMPComp was used to estimate the distance a pressure wave (blast) of one pound per square inch (psi) or the toxic end point of aqueous ammonia at these facilities would be less than the distance between the affected facilities and the schools. None of the facilities generated a toxic endpoint for ammonia or pressure wave of one psi that would reach a near-by school. Therefore, it is not expected that PAR 1110.2 would result in a safety hazard to local schools since the distance to the one psi pressure wave or toxic endpoint from affected biogas facilities is shorter than the distance from the facilities to the schools. Table 4-52 presents the facility distances to the schools and the distance to the toxic endpoint.

**Table 4-57  
Hazard Impacts from Affected Biogas Facilities  
to the Nearest Schools**

Name of School	Distance to School (mile)	Distance to Toxic Endpoint (mile)	Significant for NH <sub>3</sub>	Distance to 1 psi over-pressure, (mile)	Significant for LNG
St. Edward the Confessor Parish	0.39	0.01	No	0.05	No
Capo Beach Calvary Schools	0.41	0.01	No	0.05	No
El Potrero Elementary	0.36	0.01	No	0.08	No

### **Hazards near Airstrips or Airports**

Nine affected biogas facilities are within two miles of the following airports: Burbank, Chino Airport, Ontario International, Rialto Municipal, Riverside Municipal, San

<sup>35</sup> Prometheus Energy Company, Bowerman I Natural Gas Process Facility Project Description, prepared for SCAQMD, undated. The LNG storage tank proposed for the project would hold five days worth of LNG generated by the LNG facility.

Bernardino International, and Whiteman in Los Angeles County. These facilities are presented in Table 4-58.

An analysis similar to the one performed for schools was performed for airports within two miles of affected facilities. The results of the analysis indicate that no public airports or public use airports were found within the 0.1 miles (528 feet) toxic endpoint from a proposed ammonia tank. Similarly, a “worst-case” analysis was completed on each of these facilities based on the amount of LNG estimated from the landfill gas generated at the facility, then scaling the tank size from the estimated LNG generated by using the LNG facility Bowerman as a reference. RMPComp estimates the distance a pressure wave (blast) of one pound per square inch (psi) at these facilities would be less than the distance between the affected facilities and the airports. The greatest distance estimated was 0.2 miles. Therefore, although there are nine facilities within two miles of an airport or private airstrip, it is not expected that PAR 1110.2 would result in a safety hazard for the people residing or working in the project area.

### Hazards to Other Non-Residential Sensitive Receptors

SCAQMD staff identified one non-residential sensitive receptor within one-quarter mile of an affected biogas facility (see Table 4-62). The toxic endpoint and overpressure of one psi overpressure are both less than the distance between the non-residential sensitive receptor and the affected biogas facility. Therefore, none of the affected biogas facilities are expected to adversely affect sensitive receptors from an accidental storage tank release.

**Table 4-58**  
**Affected Biogas Facilities within Two Miles of an Airport/Air Strip**

Airports	Distance to Airport (mile)	Distance to Toxic Endpoint (mile)	Significant for NH3	Distance to 1 psi over-pressure, (mile)	Significant for LNG
Riverside Municipal	0.51	0.01	No	0.06	No
Ontario International	0.92	0.01	No	0.08	No
San Bernardino International	0.52	0.01	No	0.09	No
Whiteman, LA County	1.45	0.01	No	0.2	No
Rialto Municipal	0.49	0.01	No	0.08	No
Ontario International	1.58	0.01	No	0.08	No
Chino Airport	0.32	0.01	No	0.04	No
Burbank	1.18	0.01	No	0.1	No
Whiteman, LA County	1.97	0.01	No	0.1	No

**Table 4-59**  
**Facilities near Non-Residential Sensitive Receptors**

Airports	Distance to Receptor (mile)	Distance to Toxic Endpoint (mile)	Significant for NH <sub>3</sub>	Distance to 1 psi over-pressure, (mile)	Significant for LNG
Childtime Children's Ctr	0.31	0.01	No	0.06	No

### **Conclusion**

Delivery of ammonia was determined not to be significant in the NOP. In the above analysis catastrophic release from ammonia storage tanks was estimated to be above the ERPG 2 level of 150 ppm within 0.1 mile of the storage tank. Sensitive receptors are expected to be within 0.1 mile of the storage tank. Therefore PAR 1110.2 would be significant for accidental release from ammonia storage.

Based on the above analysis, the one psi overpressure from the cataclysmic destruction of the LNG storage tank is expected to extend 0.2 mile from the LNG storage tank. Sensitive receptors are expected to be within 0.1 mile of the storage tank. Therefore PAR 1110.2 would be significant for accidental release from LNG storage. During transportation of LNG, it was estimated that the adverse impacts from various releases would extend 0.3 mile. It is expected that sensitive receptors could be within 0.3 mile of roadway used by LNG trucks associated with PAR 1110.2. Therefore, PAR 1110.2 would be significant for accidental release from LNG transport.

PAR 1110.2 would be significant for accidental releases from ammonia storage, and delivery and storage of LNG.

The new exceptions and increase in VOC and CO emission limits for new engine is not expected to affect hazards or increase the use of hazardous materials. Therefore, the new exceptions and increases in VOC and CO emissions limits for new engines is not expected to make new adverse hazards/hazardous material impacts; nor substantially increase the severity of adverse hazards/hazardous material impacts that were already identified in the Draft EA.

### **Project Specific Mitigation Measures:**

SCAQMD policy requiring the use of aqueous ammonia instead of anhydrous ammonia reduces adverse impacts from SCR units. In addition, the use of 19 percent aqueous ammonia reduces adverse impacts from SCR units. The location of the SCR unit is limited by the location of the ICEs and related systems.

Secondary containment (e.g. berms), valves that fail shut, emergency release valves and barriers around ammonia or LNG storage tanks are design measures that are used to prevent the physical damage to storage tanks or limit the release of aqueous ammonia or LNG from storage tanks are typically required by local fire departments. Integrity testing of aqueous ammonia and LNG storage tanks assists in preventing failure from structural problems.

Further, as part of the proposed project, SCAQMD staff will require that affected facilities construct a containment system to be used during off-loading operations.

However, no additional mitigation measures were identified that would reduce the hazard and hazardous material impacts from ammonia or LNG to less than significant. Therefore, the remaining hazardous and hazardous material impacts from exposure to the ERPG 2 level of 150 ppm for ammonia and the one psi overpressure from the cataclysmic destruction of the LNG storage tank are considered to be significant.

Four accidental release scenarios were identified for the transport of LNG: release of LNG into a pool that evaporates and disperses without ignition; the ignition of a flammable cloud, a boiling liquid expanding vapor explosion (BLEVE) occurs, or the tank ruptures, rockets away and ignites. The worst-case endpoint from these scenarios is 0.3 miles from a vapor cloud fire, BLEVE or where rocketing tank would land. Assuming that these accidents would occur near receptors, PAR 1110.2 is significant for LNG accidental release during transport.

**Remaining Hazards and Hazardous Materials Impacts:**

Since no additional mitigation measures were identified that would reduce the hazard and hazardous material impacts from ammonia or LNG to less than significant, the remaining hazards and hazardous material impacts remain significant.

**Cumulative Hazards and Hazardous Materials Impacts:**

As noted in previous subsections, the accidental release of aqueous ammonia during transport is not expected to result in exposures to ammonia exceeding the ERPG 2 level, 150 ppm that would be considered significant. Because receptors could be closer than 0.1 miles, an accidental release of ammonia onsite, either during unloading from a truck or an accidental release in the event of storage tank failure is considered significant. No mitigation measures were identified that could reduce project-specific releases of LNG offsite to less than significant.

Adverse impacts from an accidental release of aqueous ammonia and/or LNG are localized impacts (i.e., the impacts are isolated to the area around the facilities). None of the affected biogas facilities under PAR 1110.2 are located within one mile of each other. All aqueous ammonia toxic endpoints are equal or less than 0.1 mile and the distance of a pressure wave from an LNG release of one psi is less than or equal to 0.3 mile. Since none of the facilities are within one mile of each other, no receptors would be affected by accidents at multiple facilities. However, to the extent that affected biogas facilities are located near other facilities that have hazardous materials risks, the cumulative adverse hazard impacts from this project could contribute to existing nearby hazard risks from other projects. Therefore, cumulative hazard risks from implementing PAR 1110.2 are considered to be significant.

**Cumulative Hazards and Hazardous Materials Impact Mitigation:**

No additional mitigation measures were identified that reduce cumulative impacts from hazards and hazardous materials, to less than significant. Therefore, cumulative hazards/hazardous materials impacts remain significant.

**Solid/Hazardous Waste**

The proposed project may cause a one time increase in the quantity of waste generated at affected facilities if operators replace existing ICEs with new ICEs, catalysts, or catalyst to comply with PAR 1110.2 or replace existing ICEs with alternative control technologies. Installs of new or expanding old catalytic units (oxidation catalyst, three-way catalyst or SCR) could generate a new or increased spent catalyst waste stream.

**Significance Criteria**

The proposed project impacts on solid/hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

**Solid Waste – Replacement of Existing ICEs**

Solid or hazardous wastes generated from construction-related activities would consist primarily of materials from the demolition of existing air pollution control equipment and construction associated with new air pollution control equipment. Construction-related waste would likely be disposed of at a Class II (industrial) or Class III (municipal) landfill. There are 48 Class II/Class III landfills within the SCAQMD's jurisdiction. Based on a search of the California Integrated Waste Management Board's Solid Waste Information System (SWIS) on May 16, 2007, there landfills that accept construction waste in Los Angeles, Orange, Riverside and San Bernardino counties have a combined remaining disposal capacity of approximately 750,846,000 cubic yards (1,250,367,507 tons).

As noted in previous sections in this chapter, SCAQMD staff estimates that, when compared to the cost of complying with PAR 1110.2; operators of approximately 225 non-biogas engines may elect to replace existing non-biogas engines with electric motors because this is expected to be a less costly compliance option. Further, operators of biogas facilities may replace ICEs with alternative ICE technologies, such as fuel cells, boilers, gas turbine, microturbines or LFG to LNG plants rather than comply with PAR 1110.2. As a worst-case scenario all biogas engines and 225 non-biogas engine may be removed by facility operators and replaced with alternative compliance options or electric motors, respectively. Under this scenario, up to 291 ICEs (225 non-biogas engines + 66 biogas engines) would be removed and replaced. Assuming that replacing an average engine would generate seven tons of waste, approximately 2,037 tons of waste could be generated from replacing 291 engines. The 2,037 tons of solid waste would be less than one percent ( $1.6 \times 10^{-4}$  percent) of the remaining capacity limit, if it is conservatively assumed that one cubic yard of solid waste weighs one ton.

Solid waste that is 0.00016 percent of the total landfill disposal capacity of the district is well within the disposal capacity of district landfills. Further, even assuming that all 291 engines are removed, some engines may have relatively long useful lives remaining and would likely be resold outside of the district. Those engines not resold outside of the district contain a large percentage of useful metals and, therefore, would more likely be dismantled and sold as scrap metal. Consequently, the actual amount of material disposed of in local

district landfills would be substantially less than estimated here. As a result, solid waste impacts from removing and disposing of existing engines to comply with PAR 1110.2 are not anticipated to be significant.

### **Solid/Hazardous Waste – Catalyst**

PAR 1110.2 could generate potentially significant hazardous wastes from replacing spent catalyst generated by new or modified oxidation and SCR units. PAR 1110.2 would generate a one time disposal of catalyst from existing three-way catalyst that need to be replaced to comply with PAR 1110.2. The proposed project would eventually generate a continuous stream of hazardous waste materials from upgraded or new catalyst units. Catalysts, either oxidation catalyst, three-way catalyst or SCR, can last up to five years depending on actual operating conditions. To provide a conservative analysis, SCAQMD staff assumed that oxidation catalyst, three-way catalyst and SCR catalysts would be replaced every three years.

Operators of facilities where affected large engines have existing catalyst-based control equipment, may regenerate, reclaim or recycle the catalysts, in lieu of disposal. In the past, due to the heavy metal content and its relatively high cost, recycling oxidation catalysts has been a lucrative choice. In some cases operators of equipment retrofitted with SCR catalysts have contractual agreements with the catalyst manufacturer to reclaim and recycle the catalysts upon replacement. Although in some situations it is expected that spent catalysts could be reclaimed and recycled, it is possible that spent catalysts could be disposed of. The composition of the catalyst will determine in which type of landfill a catalyst would be disposed. There are two main types of catalysts: one in which the catalyst is coated onto a metal structure and a ceramic-based catalyst onto which the catalyst components are calcified.

Catalysts with a metal structure would not normally be considered a hazardous waste. Instead, it would be considered a metal waste, like copper pipes, and, therefore, would not be a regulated waste requiring disposal in a Class I landfill unless it is friable or brittle. Ceramic-based catalysts are not considered friable or brittle because they typically include a fiber binding material in the catalyst material. Furthermore, typical catalyst materials are not considered to be water soluble. As a result, and depending on the actual catalyst material, spent catalyst would not require disposal in a Class I landfill.

Based on the above information, it is likely that spent catalysts would be considered a “designated waste,” which is characterized as a non-hazardous waste consisting of, or containing pollutants that, under ambient environmental conditions, could be released at concentrations in excess of applicable water objectives, or which could cause degradation of the waters of the state (CCR, Title 23, Chapter 3 Subparagraph 2522(a)(1)). Depending on its actual waste designation, spent catalysts could be disposed of in a Class II landfill or a Class III landfill that is fitted with liners.

PAR 1110.2 is expected to generate 95.7 tons of catalysts over three years (14.3 tons for upgraded systems, 45.3 tons for new three way catalysts, and 36.1 tons for SCR systems)

(details of the analysis can be found Appendix C), which would be slightly more than 31 tons per year based on replacing catalysts every three years.

There are 48 Class II/Class III landfills within the SCAQMD's jurisdiction. Based on a search of the California Integrated Waste Management Board's Solid Waste Information System (SWIS) on May 16, 2007, there landfills that accept construction waste in Los Angeles, Orange, Riverside and San Bernardino counties have a combined remaining disposal capacity of approximately 750,846,000 cubic yards (1,250,367,507 tons). The estimated life of the district landfills range from one year (Bradley Landfill in Los Angeles County) to 60 years (Prima Deschecha in Orange County). The total daily permitted disposal capacity of district landfills is approximately 93,979 tons per day<sup>36</sup>. If all 36.1 tons of catalyst material generated each year were disposed of on the same day, the catalyst material would represent 0.03 percent of the total district permitted disposal capacity. Solid waste that is 0.03 percent of the total daily permitted landfill disposal capacity for landfills in the district is well within the disposal capacity of district landfills.

However, if the oxidation catalyst, three-way catalyst and SCR catalyst are designated Class I waste, then it is expected that the catalysts would be disposed in one of three Class I landfills in California: Chemical Waste Management Kettleman Hills in Kettleman City, CA; Clean Harbors Buttonwillow in Buttonwillow, CA or Clean Harbors Westmorland in Westmorland, CA. Chemical Waste Management Kettleman Hills has a remaining capacity of 7,360,000 cubic yards with an estimated closure date of 2037. Clean Harbors Buttonwillow and Westmorland have a combined remaining capacity of 12,731,000 cubic yards with an estimated closure date of 2036. Based on the closure dates the three facilities would receive approximately 708,472 cubic yards of hazardous waste per year. Thirty-six tons per year would be less than one percent (0.004 percent) of the average hazardous waste that would be received based on the closure dates and remaining capacity. Based on these results, if catalysts were classified as a hazardous waste, there is sufficient disposal capacity in California to accommodate this amount of waste.

Therefore, whether the catalysts are disposed of as solid or hazardous waste the adverse impacts would be less than significant. The above analysis represents a "worst-case" analysis because some catalysts may be recovered and recycled, either for reuse as a catalyst or for other uses. For example, some ceramic-based SCR catalysts can be crushed and used in cement for construction projects. Further, depending on actual operating conditions at affected facilities, catalysts would not need to be replaced every three, but could last as long as five years. Based upon these considerations, significant adverse solid/hazardous waste impacts are not expected from the implementation of the proposed project.

### **Project Specific Mitigation Measures:**

Since no significant adverse impacts were identified, no project-specific mitigation measures are required.

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<sup>36</sup> SCAQMD. 2007. Final Program Environmental Impact Report for the 2007 Air Quality Management Plan. (SCH. No.2006111064).



**Remaining Solid/Hazardous Waste Impacts:**

Since no significant adverse impacts were identified, there are not remaining solid/hazardous waste impacts.

**Cumulative Solid/Hazardous Waste Impacts:**

Since no significant adverse project-specific solid/hazardous waste impacts were identified, these impacts are not considered to be cumulatively considerable as defined in CEQA Guidelines §14064(h)(1). As a result, no cumulative solid/hazardous waste impacts are expected from implementing PAR 1110.2.

**Cumulative Solid/Hazardous Waste Impact Mitigation:**

Since no significant adverse cumulative solid/hazardous waste impacts were identified, no cumulative mitigation measures are required.

**POTENTIAL ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT**

While all the environmental topics required to be analyzed under CEQA were reviewed to determine if the proposed amended rule would create significant impacts, the screening analysis concluded that the following environmental areas would not be significantly adversely affected by PAR 1110.2: agriculture resources, biological resources, cultural resources, geology/soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, and transportation/traffic. These topics were not analyzed in further detail in this environmental assessment, however, a brief discussion of each is provided below.

**Agriculture Resources**

Implementation of PAR 1110.2 would not result in any new construction of buildings or other structures that would convert farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. There are no provisions in the proposed amended rule that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed project. Therefore no significant impacts to agricultural resources are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect agricultural resources. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse agricultural impacts significant.

## Biological Resources

PAR 1110.2 would only apply to equipment or processes located within the confines of commercial or industrial facilities in commercial or industrial areas, which have already been greatly disturbed. In general, these areas currently do not support riparian habitat, federally protected wetlands, or migratory corridors. Additionally, special status plants, animals, or natural communities are not expected to be found within close proximity to the affected facilities. Therefore, the proposed project would have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely in the SCAQMD's jurisdiction. Further, a conclusion of the 2003 AQMP EIR was that population growth in the region would have greater adverse effects on plant species and wildlife dispersal or migration corridors in the basin than SCAQMD regulatory activities (e.g., air quality control measures or regulations). The current and expected future land use development to accommodate population growth is primarily due to economic considerations or local government planning decisions.

There are no provisions in the proposed amended rule that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed project. PAR 1110.2 would not affect in any way habitat conservation or natural community conservation plans, agricultural resources or operations, and would not create divisions in any existing communities. Therefore, no significant impacts to biological resources are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect biological resources. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse biological impacts significant.

## Cultural Resources

There are existing laws in place that are designed to protect and mitigate potential impacts to cultural resources. PAR 1110.2 is not expected to result in heavy earthmoving construction or operations, no impacts to historical resources will occur as a result of this project. Consequently, the proposed project has little or no potential to disturb cultural resources. Therefore, PAR 1110.2 has no potential to cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside a formal cemeteries. Further, PAR 1110.2 is not anticipated to result in any activities or promote any programs that could have a significant adverse impact on cultural resources in the district. Therefore, no significant impacts to cultural resources are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect cultural resources. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse cultural impacts significant.

### **Geology and Soils**

The proposed project is not expected to require heavy earthmoving. Construction may be required for retrofit, replacement or new equipment. Biogas facilities may replace ICEs with turbines, microturbines, boilers or biogas to LNG facilities. The most construction occur if ICEs were replaced with LNG facilities. SCAQMD staff has had discussions with Apollo energy, which installed and operates the biogas to LNG plant at Bowerman. The biogas-to-LNG facilities are modular and dropped into place at biogas facilities. The LNG facilities are built to be modular to allow for operations to be scaled down and removed in the future. Therefore, heavy construction is not expected. Any construction is expected to follow the Uniform Building Code, which includes geological and soil safety provisions. Thus, the proposed project would not induce or alter the exposure of people or property to geological hazards such as expansive soils, lateral spreading, subsidence, liquefaction or collapse, earthquakes, landslides, mudslides, ground failure, or other natural hazards. As a result, substantial exposure of people or structures to the risk of loss, injury, or death is not anticipated. Therefore, no significant impacts to geology and soils are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect geology and soils. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse geology and soils impacts significant.

### **Hydrology and Water Quality**

PAR 1110.2 may require the replacement or retrofit of ICE systems. PAR 1110.2 has no provision that would require the use of water or the disposal of wastewater.

Subsequent to the release of the NOP/IS, SCAQMD staff has determined the biogas operators may replace their ICEs with turbines, microturbines, boilers or biogas to LNG facilities. Based on the industry survey, biogas facilities currently remove water from biogas operations. Systems that replace ICEs would still need to remove water. SCAQMD staff expects that biogas operations would remove water in same fashion as it is removed now. For biogas facilities currently managing stormwater, PAR 1110.2 is not expected to

alter the existing stormwater practices. Therefore, PAR 1110.2 is expected to be less than significant for hydrology and water quality.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, is not expected to use or discharge water. The increase in VOC and CO emission limits for new engines is not expected to use or discharge water. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse hydrology and water quality impacts significant.

### **Land Use and Planning**

There are no provisions in the proposed amended rule that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by further monitoring and emission reductions from ICEs. All proposed operations are expected to occur within the confines of the existing commercial and industrial facilities. Since the proposed amended rule would only affect ICE systems, PAR 1110.2 would not affect in any way habitat conservation or natural community conservation plans, agricultural resources or operations, and would not create divisions in any existing communities. No new development or alterations to existing land designations will occur as a result of the implementation of the proposed amended rule. Therefore, no significant adverse impacts affecting land uses are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect land use and planning. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse land use and planning impacts significant.

### **Mineral Resources**

There are no provisions of the proposed project that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state such as aggregate, coal, clay, shale, et cetera, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no significant adverse impacts to mineral resources are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect mineral resources. The increase in VOC and CO emission limits for new engines is not expected

cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse mineral resource impacts significant.

## Noise

The existing noise environment at each of the affected facilities is dominated by industrial equipment, vehicular traffic around the facilities, and trucks entering and exiting the facilities. However, since activity during high wind event is not expected to be any greater than activity during normal operation, noise from the proposed project is not expected to produce noise in excess of current operations at each of the existing facilities. It is expected that commercial and industrial facilities affected by PAR 1110.2 would continue to comply with all existing noise control laws or ordinances. Further, Occupational Safety and Health Administration (OSHA) and California-OSHA have established noise standards to protect worker health. These potential noise increases are expected to be less than significant, thus, implementing PAR 1110.2 is not expected to result in significantly adverse noise impacts.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development, no increase in noise is expected. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse noise impacts significant.

## Population and Housing

Modifications to existing ICEs would occur completely within existing industrial facilities. The proposed project is not anticipated to generate any significant effects, either direct or indirect, on the district's population or population distribution as the additional workers needed during the construction phase are expected to come from the existing labor pool in the southern California area. Further, PAR 1110.2 is not expected to require a significant number of new permanent employees at each affected facility. In the event that new employees are hired, it is expected that the number of new employees at any one facility would be small. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing PAR 1110.2. Accordingly, no significant adverse impacts on human population or housing are expected.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect population and housing. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2

engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse population and housing impacts significant.

### **Public Services**

PAR 1110.2 is not expected to increase the need or demand for additional public services, e.g., fire departments, police departments, schools, parks, government, etc, above current levels. The proposed project is no expected to result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives.

A comment was received during the public review period that stated that facilities may electrify and install diesel back-up generators to comply with PAR 1110.2. The commenter stated that because diesel fuel is stored in limited amounts PAR 1110.2 could impact fire fighting operations. For systems, such as water utilities, it is expected that operators would ensure the delivery of water during emergencies. SCAQMD staff expects that water agencies that electrify systems would use the existing natural gas engines as emergency back-up generators. Using the existing engines as emergency back-up generators would provide for the delivery of water during emergencies. The technology assessment in 2010 would also address safety issues and ensure that essential public services are safe guarded. Therefore, significant adverse impacts to public services are not expected to be significant.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect public resources. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse public resource impacts significant.

### **Recreation**

As discussed under “Land Use” above, there are no provisions to the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments; no land use or planning requirements will be altered by the proposal. The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, impacts to recreational facilities are not expected to be significant.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since the exemptions would only effect operations within the boundaries of existing facilities, they would not affect recreational

resources. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse recreational impacts significant.

### **Transportation/Traffic**

PAR 1110.2 would generate additional construction and operational traffic. PAR 1110.2 would require the construction of additional monitoring and control equipment and infrastructure. PAR 1110.2 would require additional truck trips for source testing, spent catalyst removal, new catalyst delivery, ammonia delivery, and LNG haul trucks. A maximum of 62 truck trips per day is expected during construction at any facility. A maximum of 114 truck trips per day is expected during operation at any facility. Since facilities are scattered through out the SCAQMD and trips would be expected to be spread throughout the day, the overall adverse impact to traffic is expected to be minor. Therefore proposed project impacts from traffic are not expected to be significant.

Exceptions added to PAR 1110.2 since the release of the Draft EA would allow affected engines to operate at existing levels during emergencies and certain weather conditions; therefore, would not cause new development. Since natural gas is supplied to existing sites through pipe lines, the exceptions would not affect transportation and traffic. The increase in VOC and CO emission limits for new engines is not expected cause new development. The installation and operation of new PAR 1110.2 compliant engines is expected to be similar to the installation and operation of new Rule 1110.2 engines with BACT. Therefore, the new exceptions and increase in VOC and CO emission limits for new engines are not expected to make adverse transportation impacts significant.

### **SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

CEQA Guidelines §15126(c) requires an environmental analysis to consider "any significant irreversible environmental changes which would be involved if the proposed action should be implemented." This EA identified aesthetics, air quality, energy hazards/hazardous materials and solid/hazardous waste as the environmental areas potentially adversely affected by the proposed project. The NOP/IS also identified solid/hazardous waste as significant, but after further analysis solid/hazardous waste was determined not to be significant.

Aesthetic significant adverse impacts can be considered irreversible since facility operators that install monitoring, emission control or ICE replacements are likely to operate with these systems for the lifetime of the equipment. Facility operators may replace these systems with similar systems.

Significant adverse impacts to air quality are not considered irreversible, since PAR 1110.2 is part of an AQMP, which overtime is designed to achieve attainment for criteria pollutants. Health risk from air toxics should be reduced overtime as clean, new engines replace older more polluting engine and diesel particulate control is added.

Significant adverse impacts from accidental releases of aqueous ammonia and LNG may be considered irreversible. As stated in the aesthetics discussion above, facility operators that install monitoring, emission control or ICE replacements are likely to operate with these systems for the lifetime of the equipment. Facility operators may replace these systems with similar systems. The delivery and storage of aqueous ammonia and LNG on-site would continue to have potential significant accidental release consequences.

### **POTENTIAL GROWTH-INDUCING IMPACTS**

CEQA Guidelines §15126(d) requires an environmental analysis to consider the "growth-inducing impact of the proposed action." Implementing PAR 1110.2 would not, by itself, have any direct or indirect growth-inducing impacts on businesses in the SCAQMD's jurisdiction because it is not expected to foster economic or population growth or the construction of additional housing and primarily affects existing commercial and industrial facilities. No additional workers are expected to be need at the affected facilities.

### **CONSISTENCY**

The Southern California Association of Governments (SCAG) and the SCAQMD have developed, with input from representatives of local government, the industry community, public health agencies, the USEPA - Region IX and CARB, guidance on how to assess consistency within the existing general development planning process in the Basin. Pursuant to the development and adoption of its Regional Comprehensive Plan Guide (RCPG), SCAG has developed an Intergovernmental Review Procedures Handbook (June 1, 1995). The SCAQMD also adopted criteria for assessing consistency with regional plans and the AQMP in its CEQA Air Quality Handbook. The following sections address the consistency between PAR 1110.2 and relevant regional plans pursuant to the SCAG Handbook and SCAQMD Handbook.

#### **Consistency with Regional Comprehensive Plan and Guide (RCPG) Policies**

The RCPG provides the primary reference for SCAG's project review activity. The RCPG serves as a regional framework for decision making for the growth and change that is anticipated during the next 20 years and beyond. The Growth Management Chapter (GMC) of the RCPG contains population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review. It states that the overall goals for the region are to (1) re-invigorate the region's economy, (2) avoid social and economic inequities and the geographical isolation of communities, and (3) maintain the region's quality of life. Based on the following discussion PAR 1110.2 is consistent with RCPG policies.

#### **Consistency with Growth Management Chapter (GMC) to Improve the Regional Standard of Living**

The Growth Management goals are to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. PAR 1110.2 in relation to the GMC would not interfere with the achievement of such goals, nor would it interfere with any powers exercised by local land



use agencies. Modifications to existing ICEs at affected facilities would likely be subject to permit modifications. The SCAQMD has implemented a series of actions over the six to eight years to streamline the SCAQMD permit process. As a result, PAR 1110.2 would not interfere with efforts to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

### **Consistency with Growth Management Chapter (GMC) to Provide Social, Political and Cultural Equity**

The Growth Management goals are to develop urban forms that avoid economic and social polarization, promotes the regional strategic goals of minimizing social and geographic disparities, and of reaching equity among all segments of society. Consistent with the Growth Management goals, local jurisdictions, employers and service agencies should provide adequate training and retraining of workers, and prepare the labor force to meet the challenges of the regional economy. Growth Management goals also include encouraging employment development in job-poor localities through support of labor force retraining programs and other economic development measures. Local jurisdictions and other service providers are responsible for developing sustainable communities and providing, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection. Implementing PAR 1110.2 has no effect on and, therefore, is not expected to interfere with the goals of providing social, political and cultural equity.

### **Consistency with Growth Management Chapter (GMC) to Improve the Regional Quality of Life**

The Growth Management goals also include attaining mobility and clean air goals and developing urban forms that enhance quality of life, accommodate a diversity of life styles, preserve open space and natural resources, are aesthetically pleasing, preserve the character of communities, and enhance the regional strategic goal of maintaining the regional quality of life. The RCPG encourages planned development in locations least likely to cause environmental impacts, as well as supports the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals. While encouraging the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites, the plan discourages development in areas with steep slopes, high fire, flood and seismic hazards, unless complying with special design requirements. Finally, the plan encourages mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and develop emergency response and recovery plans. PAR 1110.2 would reduce NO<sub>x</sub>, CO and VOC emissions from ICEs and better monitor compliance. Therefore, in relation to the GMC, PAR 1110.2 is not expected to interfere with any air quality goals related to the GMC.

### **Consistency with Regional Mobility Element (RMP) and Congestion Management Plan (CMP)**

PAR 1110.2 is consistent with the RMP and CMP since no significant adverse impact to transportation/circulation would result from further control of NO<sub>x</sub>, CO and VOC from

ICES. Since PAR 1110.2 is not expected to have a significant adverse impact on transportation/traffic, PAR 1110.2 is not expected to significantly adversely affect circulation patterns or congestion management.

## **CHAPTER 5**

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### **ALTERNATIVES**

**Introduction**

**Alternatives Rejected as Infeasible**

**Description of Alternatives**

**Evaluations of the Relative Merits of the Project Alternatives**

**Conclusion**

## INTRODUCTION

This ~~Draft~~Final EA provides a discussion of a range of reasonable alternatives to the proposed project as required by state CEQA Guidelines §15126.6. Alternatives include measures for attaining objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative. A "No Project" alternative must also be evaluated (CEQA Guidelines §15126.6(e)). The range of alternatives must be sufficient to permit a reasoned choice, but need not include every conceivable project alternative. State CEQA Guidelines §15126.6(c) specifically notes that the range of alternatives required in a CEQA document is governed by a 'rule of reason' and only necessitates that the CEQA document set forth those alternatives necessary to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision making and meaningful public participation. A CEQA document need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

SCAQMD Rule 110 (the rule which implements the SCAQMD's certified regulatory program) does not impose any greater requirements for a discussion of project alternatives in an environmental assessment than is required for an EIR under CEQA.

SCAQMD's policy document Environmental Justice Program Enhancements for FY 2002-03, Enhancement II-1 recommends that all SCAQMD CEQA assessments include a feasible project alternative with the lowest air toxics emissions. In other words, for any major equipment or process type under the scope of the proposed project that creates a significant environmental impact, at least one alternative, where feasible, shall be considered from a "least harmful" perspective with regard to hazardous air emissions.

The Governing Board may choose to adopt any portion or all of any alternative presented below. The Governing Board is able to adopt any portion or all of any of the following alternatives because the impacts of each alternative are fully disclosed to the public and the public has the opportunity to comment on the alternatives and impacts generated by each alternative.

## ALTERNATIVES REJECTED AS INFEASIBLE

A CEQA document should identify any alternatives that were considered by the lead agency, but were rejected as infeasible during the scoping process and explain the reasons underlying the lead agency's determination [CEQA Guidelines §15126.6(c)]. Because the scope of the current amendments is focused primarily on enhancing enforcement and obtaining further emission reductions through currently available control technologies and because there are a number of options for reducing emissions from affected equipment, e.g., installing control equipment or replacing existing ICEs with alternative compliance technologies, no alternatives identified were rejected as infeasible.

## DESCRIPTION OF ALTERNATIVES

The following proposed alternatives were developed by modifying specific components of the proposed amended rule. The rationale for selecting and modifying specific components of the proposed amended rule to generate feasible alternatives for the analysis is based on

CEQA's requirement to present "realistic" alternatives; that is, alternatives that can actually be implemented.

In addition to the No Project Alternative, the following three alternatives were developed by identifying and modifying major components of PAR 1110.2. As stated in the Areas of Controversy section of Chapter 1, staff and stakeholders have been and are currently in discussions regarding specific provisions to be included in PAR 1110.2. Specifically, the primary components of the proposed alternatives that have been modified are the requirements related to emission concentration compliance limits for the three pollutants regulated by Rule 1110.2, efficiency correction for biogas combustion, source testing averaging times, compliance dates, natural life allowance, natural gas usage for biogas engines, and low usage exemptions. The alternatives, summarized in Table 5-1 and described in the following subsections, include the following: Alternative A (No Project); Alternative B (Low Use); and Alternative C (Enhanced Enforcement). Unless otherwise specifically noted, all other components of the project alternatives are identical to the components of PAR 1110.2. The following subsections provide a brief description of each project alternative and Table 5-1 summarizes the main components of each alternative.

#### **Alternative A - No Project Alternative**

Alternative A, the No Project Alternative, would mean not adopting PAR 1110.2 and, therefore, maintaining the existing emission compliance limits, CEMS requirements, source testing requirements, etc., of Rule 1110.2.

#### **Alternative B – Low Use Alternative**

PAR 1110.2 has an exception to concentration limits for non-biogas ICEs that are used less than 500 hours or that burn less than one billion Btu of fuel per year (high heating value). Alternative B, the Low Use Alternative, would expand the low use exception relative to complying with the proposed emission reduction requirements to non-biogas engines ICEs that are used less than 1,000 hours or that burn less than two billion Btu per year of fuel (high heating value). What this means is that the non-biogas engines that qualify for this exception would continue to comply with existing Rule 1110.2 NO<sub>x</sub>, VOC, and CO concentration requirements. This exception would apply to 32 additional engines.

The averaging time for PAR 1110.2 compliance limits is 15 minutes. Alternative B would also extend the averaging time from 15 minutes to one hour. Some affected facility operators have stated that existing control devices cannot meet the PAR 1110.2 compliance limits because of fluctuations in emissions and that a longer averaging time would prevent the need to replace existing control equipment with newer equipment for minor reductions in emissions. The averaging time component of Alternative B, therefore, responds to facility operators' comments regarding averaging times.

**Table 5-1  
Summary of PAR 1110.2 and Project Alternatives**

Requirement	Proposed Project	Alternative A (No Project)	Alternative B (Low Use)	Alternative C ( <del>Compliance Only</del> Enhanced Compliance)	Alternative D (BACT)
Compliance Limits	11 ppm NOx 30 ppm VOC 250 ppm CO	<u>NOx VOC CO (ppm)</u> Table I: 11 30 70 Table II: 36 250 2,000 Table III $\geq$ 50 bhp: 36 250 NA Table III $>50$ bhp $<$ 500 bhp: 45 250 NA	11 ppm NOx 30 ppm VOC 250 ppm CO	<u>NOx VOC CO (ppm)</u> Table I: 11 30 70 Table II: 36 250 2,000 Table III $\geq$ 50 bhp: 36 250 NA Table III $>50$ bhp $<$ 500 bhp: 45 250 NA	11 ppm NOx 30 ppm VOC 70 ppm CO
Efficiency Correction for Biogas	No	Yes	No	No	No
Averaging Times	15 min	15 min	1 hour	15 min	15 min
Compliance Dates	<u>Emission limits</u> 2010 - 2012 <u>Monitoring</u> 2008 - 2010	N/A	<u>Emission limits</u> 2010 - 2012 <u>Monitoring</u> 2008 - 2010	<u>Monitoring</u> 2008 - 2010	<u>Emission limits</u> 2012 - 2014 <u>Monitoring</u> 2008 - 2010
Natural Life Allowance	None	N/A	None	None	Additional two years to comply with concentration limits
Natural Gas Percentage Limits	10	N/A	10	25	10
Low Usage Exception from Non-Biogas Compliance Limits	Less than 500 hours or less than 1,000 MMBtu annually	None	Less than 1,000 hours or less than 2,000 MMBtu annually	None	Same as PAR 1110.2

**Table 5-1 (continued)**  
**Summary of PAR 1110.2 and Project Alternatives**

<b>Requirement</b>	<b>Proposed Project</b>	<b>Alternative A (No Project)</b>	<b>Alternative B (Low Use)</b>	<b>Alternative C (<del>Compliance Only</del> Enhanced Compliance)</b>	<b>Alternative D (BACT)</b>
CEMS	Stationary ICE groups of 1,500 bhp ICEs or more included in CEMS unless < 500 bhp or operated <1,000 hr/yr or < 8 x 10 <sup>9</sup> Btu/year	N/A	Same as PAR 1110.2, except lean-burn engines are exempt from CEMS requirements	Same as PAR 1110.2	Same as PAR 1110.2
Replacement of Existing ICE with Electric Motors	Voluntary	None	Voluntary	None	Mandatory

Similar to the proposed project, because Alternative B contains the same emission concentration requirements, SCAQMD staff expects that operators of the same categories of non-biogas engines would choose to replace existing engines with electric motors as a less costly compliance option.

Alternative B would include all of the CEMS requirements in the proposed project, but would add an exception that excludes lean-burn engines from the NO<sub>x</sub> CEMS requirements. It was estimated that the exception would apply to approximately nine facilities.

All other provisions of Alternative B are the same as PAR 1110.2, including compliance dates, reporting provisions, etc.

### **Alternative C – Enhanced Enforcement**

Alternative C, the Enhanced Enforcement Alternative, would limit modifications to Rule 1110.2 to address compliance issues identified by SCAQMD inspectors. Similar to PAR 1110.2, to enhance enforcement, Alternative C would include the same: CEMs installation requirements in paragraph (e)(3); inspection and monitoring plan requirements in paragraph (e)(4); and monitoring, testing, recordkeeping, and reporting requirements; and reporting noncompliance requirements in subdivision (f). Alternative C would also eliminate the efficiency correction for biogas averaging times. No changes would be made to the existing compliance limits in Rule 1110.2. Replacement of non-biogas engines with electric motors is not expected under Alternative C.

Alternative C is considered to be the least toxic alternative for the following reasons. Although Alternative C would not generate emission reductions beyond what is currently required by Rule 1110.2, it will enhance enforcement of the rule to obtain emission reductions originally anticipated for the Rule. For example, as indicated in Chapter 3, during unannounced site visits and compliance tests, some engines were demonstrated to exceed existing emission concentrations in Rule 1110.2, some engines by a wide margin. Further, because Alternative C does not impose additional emission reduction requirements, it is not expected that add-on control would be installed, ICEs replaced with alternative technologies, or emergency engines installed. As a result, Alternative C would not result in new ammonia slip emissions or diesel exhaust particulate. Ammonia is not considered to be a carcinogen, it can have chronic and acute health impacts. Diesel particulate has both carcinogenic and chronic health effects.

### **Alternative D – Best Available Control Technology**

Alternative D, the Best Available Control Technology (BACT) Alternative, would lower CO emission compliance limits to BACT emissions levels. The proposed emission compliance limits for NO<sub>x</sub> and VOC would be the same as for PAR 1110.2. With respect to emission compliance limits, Alternative D is similar to staff's initial proposal for PAR 1110.2, which also would have established compliance limits for CO at BACT emissions levels. Alternative D would include a useful life provision extending the final compliance dates for new concentration limits from 2012 to 2014 for biogas engines.



Alternative D would include a requirement that facility operators replace existing non-biogas engines with electric motors based on engine categories identified in Table 4-7, where it is expected that installing electric motors would be less costly than complying with the requirements of PAR 1110.2. An exception would be included that would allow facility operators to demonstrate to the Executive Officer other mitigating factors besides compliance/replacement costs that may prevent facility operators from replacing affected non-biogas engines with electric motors.

The comparison of the relative merits of the individual alternatives assumes that for Alternative D, operators of 169 non-biogas engines would install electric motors, while operators of the remaining 56 non-biogas engines would seek the exception to installing an electric motor due to unique operating conditions. It is assumed that the operators of the 56 non-biogas engine who do not install electric motors will comply with the proposed emission limits in this alternative. This assumption is consistent with the analysis of PAR 1110.2.

## **EVALUATION OF THE RELATIVE MERITS OF PROJECT ALTERNATIVES**

Consistent with CEQA Guidelines §15126.6(a), the following subsections evaluate the relative merits of each project alternative. Potential adverse impacts for the environmental topics are quantified where sufficient data are available.

### **Alternative A - No Project Alternative**

#### **Aesthetics**

Alternative A would not be expected to create significant adverse aesthetics impacts, because no construction or modification of process operations or procedures would be required.

#### **Air Quality**

Alternative A would not create significant adverse construction air quality impacts because no construction or modification of processes operations or procedures would be required. One of the primary reasons for amending Rule 1110.2 is to improve compliance with the emission concentrations of the rule by imposing CEMs requirements, inspection and monitoring plan requirements; monitoring, testing, recordkeeping, and reporting requirements; etc. By not amending Rule 1110.2, it is possible that a large number of affected engines would continue to operate out of compliance. As indicated in Table 5-2, engines exceeding compliance limits could do so in amounts that exceeds applicable SCAQMD significance thresholds. Therefore, it is concluded that Alternative A could create significant adverse operation air quality impacts. In addition, implementing Alternative A would not result in the CO<sub>2</sub> emission reduction benefits anticipated for PAR 1110.2.

**Table 5-2  
Potential Emission Impacts in Violation of Rule 1110.2 from  
Implementing Alternative A**

	<b>NO<sub>x</sub>, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>
Excess Emissions	9,195	54,243	2,517
Significance Thresholds	55	550	55
Significant	Yes	Yes	Yes

### **Energy**

Alternative A would have no significant adverse diesel energy impacts, because no construction or modification of process operations or procedures would be required. Alternative A would not reduce electricity generation from existing engines that are retrofitted or replaced with less efficient energy generation equipment such as turbines, microturbines, etc., as would be the case under PAR 1110.2. Alternative A, however, would not provide the beneficial reduction in natural gas consumption that is anticipated under PAR 1110.2. Overall, Alternative A would not create any significant adverse energy impacts.

### **Hazards/Hazardous Materials**

The analysis of potential hazard/hazardous materials impacts from implementing PAR 1110.2 in Chapter 4 concluded that the alternative compliance option of replacing existing biogas ICEs with biogas to LNG plants could produce significant adverse explosion and fire impacts to nearby receptors. Because Alternative A would impose no additional compliance requirements, it would not be expected to generate any significant adverse hazard impacts compared to PAR 1110.2.

### **Solid/Hazardous Waste**

Chapter 4 concluded that, although there could be some solid waste impacts from disposal of ICE that are replaced with alternative compliance options and disposal of spent catalysts, local landfills and/or hazardous waste landfills in California could accommodate this increase in waste disposal. As a result, solid/hazardous waste impacts were concluded to be less than significant. Because Alternative A would impose no additional compliance requirements, it would not be expected to generate any significant adverse solid hazardous waste impacts compared to PAR 1110.2.

## **Alternative B – Low Use Alternative**

### **Aesthetics**

Alternative B would have similar adverse aesthetic impacts to PAR 1110.2. It is expected that Alternative B would generate fewer adverse aesthetic impacts for non-biogas facilities because the low use exception would capture fewer of these types of facilities and, as a result, operators of these facilities would not need to install control technology. However, Alternative B would have the same requirements for biogas facilities as PAR 1110.2. Since

the analysis of PAR 1110.2 concluded that biogas facilities would potentially create the greatest adverse visual impacts from installing control systems (SCR, NOxTech, etc.) or ICE replacement systems (turbines, LNG plants, etc.), the worse-case adverse visual impacts for Alternative B would be equivalent to those identified for PAR 1110.2. Therefore, like PAR 1110.2, it is expected that Alternative B would generate significant adverse impacts on aesthetics.

## **Air Quality**

### *Construction*

Because the low use exception from further emission reduction requirements would be extended to non-biogas engines under Alternative B, it is anticipated that 11 fewer ICES would need to be retrofitted with an oxidation catalyst and 30 fewer ICE would need to upgrade three-way catalyst. Alternative B would result in the installation of fewer catalysts; it is estimated to exclude eight facilities.

Alternative B would have an exception to the NOx CEMS requirements for lean-burn engines. The exception is expected to affect nine engines non-biogas at three facilities. Environmental analysis for Alternative B includes affects to direct emissions but to be conservative did not lessen secondary emissions (heavy-duty delivery trucks), hazard or solid/hazardous waste adverse impacts. The remaining facilities would be biogas facilities that would potential generate the largest construction emissions from the installation of add-on emission controls or replacement of the existing biogas engines with ICE alternative technologies (e.g., gas turbines, microturbines, LNG facilities, etc.).

Therefore these exceptions would likely have little effect on the number of construction projects on a typical day or, as a result, peak day construction emissions. Therefore, it assumed that the construction emissions for Alternative B would be approximately equivalent to those identified for PAR 1110.2.

### *Operational*

Since Alternative B would reduce the number of non-biogas engines that would need to be retrofitted with three-way catalyst or oxidation catalysts upgrade, the emission reductions from Alternative B would be less than the proposed project. Fewer oxidation catalysts would also lead to fewer catalyst truck trips because smaller amounts of spent catalyst would be disposed of and fewer replacement catalysts would be needed.

Potential secondary air quality impacts identified for biogas engines are the same as the proposed project and include ammonia slip emissions from new SCR systems and additional truck trips for spent and replacement catalysts. ICE engines that are replaced with alternative control technologies would be expect to generate similar secondary air quality impacts to the proposed project.

The air quality effects of implementing Alternative B are presented in the same way as they were for PAR 1110.2. Tables 5-3 through 5-7 present the total emissions inventory by compliance year that takes into consideration the declining operating emissions inventory

from affected equipment reducing emissions to comply with Alternative B and increased construction emissions from installing air pollution control and monitoring equipment or installing alternative compliance technologies. Table 5-3 shows the remaining emissions by compliance year and construction emissions for the compliance option of all biogas plant operators retrofitting using SCR. Table 5-4 shows the remaining emissions by compliance year and construction emissions for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 5-5 shows the remaining emissions by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with microturbines. Table 5-6 shows the remaining emissions by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with digester plant and LNG plants at landfills. Table 5-7 shows the remaining emissions by compliance year and construction emissions for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants.

A summary of operation emissions by biogas option are presented in Tables 5-3 through 5-7. Emission increases and emissions reductions from Alternative B are presented in Table 5-8 through 5-12.

**Table 5-3**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the SCR Compliance Option for Biogas Facilities under Alternative B**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	6,004	17,385	1,297	534	844	842
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,595	13,617	1,240	529	834	831
	<u>5,600</u>	<u>13,650</u>	<u>1,249</u>	<u>530</u>	<u>835</u>	<u>832</u>
<b>2012</b>	4,181	13,481	1,020	538	833	831
<b>2014</b>	4,188	13,477	1,018	538	833	831

**Table 5-4**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Gas Turbines Option**  
**for Biogas Facilities under Alternative B**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	6,004	17,385	1,297	534	844	842
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,589	13,616	1,239	529	833	831
	<u>5,594</u>	<u>13,649</u>	<u>1,248</u>	<u>530</u>	<u>834</u>	<u>832</u>
<b>2012</b>	4,882	7,416	542	538	1,019	1,017
<b>2014</b>	4,888	7,412	540	538	1,019	1,017

**Table 5-5**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Microturbine**  
**Compliance Option for Biogas Facilities under Alternative B**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	6,004	17,385	1,297	534	844	842
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,589	13,616	1,239	529	833	831
	<u>5,594</u>	<u>13,649</u>	<u>1,248</u>	<u>530</u>	<u>834</u>	<u>832</u>
<b>2012</b>	3,917	6,228	647	538	760	758
<b>2014</b>	3,923	6,224	645	538	760	758

**Table 5-6**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Gas Turbines at**  
**Digester Gas Facilities and LNG Facilities at Landfills Compliance Option for Biogas**  
**Facilities under Alternative B**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	6,004	17,385	1,297	534	844	842
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	6,076	13,816	1,297	529	872	857
	<u>6,081</u>	<u>13,849</u>	<u>1,306</u>	<u>530</u>	<u>873</u>	<u>858</u>
<b>2012</b>	4,746	6,746	586	211	911	896
<b>2014</b>	4,377	6,576	535	211	878	876

**Table 5-7**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Microturbines at**  
**Digester Gas Facilities and LNG Facilities at Landfills Compliance Option for Biogas**  
**Facilities under Alternative B**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	6,004	17,385	1,297	534	844	842
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	6,076	13,816	1,297	529	872	857
	<u>6,081</u>	<u>13,849</u>	<u>1,306</u>	<u>530</u>	<u>873</u>	<u>858</u>
<b>2012</b>	4,362	6,281	632	211	805	791
<b>2014</b>	3,993	6,111	581	211	773	771

Table 5-8 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of all biogas plant operators retrofitting using SCR. Table 5-9 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 5-10 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of biogas operators replacing ICEs with microturbines. Table 5-11 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of biogas operators replacing ICEs with

digester plant and LNG plants at landfills. Table 5-12 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants.

**Table 5-8**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Installing SCR at All Biogas Plants -Total Compared to Baseline under Alternative B**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(406) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2011</b>	(3,600) (3,594)	(40,626) (40,593)	(1,253) (1,244)	(23) (22)	(43) (42)	(44) (43)
<b>2012</b>	(5,013)	(40,762)	(1,473)	(13)	(44)	(44)
<b>2014</b>	(5,007)	(40,766)	(1,475)	(13)	(44)	(44)

Numbers in parentheses represent emission reductions.

**Table 5-9**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Gas Turbines at All Biogas Plants -Total Compared to Baseline under Alternative B**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(406) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2011</b>	(3,605) (3,600)	(40,627) (40,594)	(1,253) (1,245)	(23) (22)	(43) (43)	(44) (43)
<b>2012</b>	(4,313)	(46,827)	(1,951)	(13)	142	142
<b>2014</b>	(4,307)	(46,831)	(1,953)	(13)	142	142

Numbers in parentheses represent emission reductions.

**Table 5-10**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Microturbines at All Biogas Plants -Total Compared to Baseline under Alternative B**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(406) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2011</b>	(3,605) (3,600)	(40,627) (40,594)	(1,254) (1,245)	(23) (22)	(43) (43)	(44) (43)
<b>2012</b>	(5,278)	(48,015)	(1,846)	(13)	(117)	(117)
<b>2014</b>	(5,272)	(48,019)	(1,848)	(13)	(117)	(117)

Numbers in parentheses represent emission reductions.

**Table 5-11**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Gas Turbines at Digester Gas Facilities and LNG Facilities at Landfills -Total Compared to Baseline under Alternative B**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(406) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)
<b>2011</b>	(3,119) (3,113)	(40,427) (40,394)	(1,196) (1,187)	(22) (22)	(5) (4)	(18) (17)
<b>2012</b>	(4,449)	(47,497)	(1,907)	(340)	33.6	21.28
<b>2014</b>	(4,818)	(47,667)	(1,957)	(340)	1.2	0.73

Numbers in parentheses represent emission reductions.



**Table 5-12**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Microturbines at Digester Gas Facilities and LNG Facilities at Landfills -Total Compared to Baseline under Alternative B**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	(106) <u>(100)</u>	(334) <u>(301)</u>	(22) <u>(14)</u>	(7.5) <u>(6.9)</u>	(0.1) <u>0.8</u>	0.4 <u>0.4</u>
<b>2009</b>	(3,191) <u>(3,185)</u>	(36,858) <u>(36,825)</u>	(1,196) <u>(1,187)</u>	(17) <u>(17)</u>	(33) <u>(32)</u>	(33) <u>(32)</u>
<b>2010</b>	(3,191) <u>(3,185)</u>	(36,858) <u>(36,825)</u>	(1,196) <u>(1,187)</u>	(17) <u>(17)</u>	(33) <u>(32)</u>	(33) <u>(32)</u>
<b>2011</b>	(3,119) <u>(3,113)</u>	(40,427) <u>(40,394)</u>	(1,196) <u>(1,187)</u>	(22) <u>(22)</u>	(5) <u>(4)</u>	(18) <u>(17)</u>
<b>2012</b>	(4,833)	(47,962)	(1,861)	(340)	(72)	(84)
<b>2014</b>	(5,202)	(48,132)	(1,912)	(340)	(104)	(104)

Numbers in parentheses represent emission reductions.

As is the case with PAR 1110.2, the worst-case emissions from Alternative B would occur if all biogas operators replace existing ICEs with gas turbines. PM<sub>2.5</sub> emissions would exceed the PM<sub>2.5</sub> significance threshold of 55 pounds per day if facilities replace ICEs with gas turbines (142 pounds per day).

Similar to the air quality analysis for PAR 1110.2, the air quality analysis for Alternative B includes the assumption that operators of 169 non-biogas engines would replace existing engines with electric motors. Based on this assumption, it is expected that Alternative B would also reduce CO<sub>2</sub> emissions. Similar to PAR 1110.2, Alternative B would require a technology assessment, but it would be required in 2012 instead of 2010. The technology assessment would include the number of non-biogas engines that have been replaced with electric motors. As with PAR 1110.2, any shortfalls in CO<sub>2</sub> emission reductions would be made up by other measures identified at the time the technology assessment is completed. For overall CO<sub>2</sub> reductions, approximately 14 engines would need to be replaced. Table 5-13 summarizes the overall CO<sub>2</sub> reduction analysis.

**Table 5-13**  
**Average Number of ICE Engines Replaced with Electric Motors Needed for CO<sub>2</sub>**  
**Reductions under Alternative B**

Description	Proposed Project CO <sub>2</sub> , ton/10 years	No Electrification CO <sub>2</sub> , ton/10 years	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor for CO <sub>2</sub> Reductions
SCR	(264,959)	11,516	276,475	1,636	8
Replace ICE with Gas Turbine	(104,642)	9,157	113,799	673	14
Replace ICE Microturbine	(266,520)	9,955	276,475	1,636	7
Replace LFG w LNG, DG w Turbines	(1,228,165)	(951,690)	276,475	1,636	0
Replace LFG w LNG, DG w Microturbines	(1,227,406)	(950,932)	276,475	1,636	0

Electric motors were assumed to have a ten year lifespan.

### **Energy**

Expanding the low use exception would reduce the number of engines that would need to be retrofitted with oxidation catalyst. The exception of lean-burn engines from the NO<sub>x</sub> CEMS requirements would reduce the amount of electricity required to operate CEMS at seven facilities. This aspect of Alternative B is not expected to change the magnitude of adverse energy impacts previously identified for PAR 1110.2. There would be an incremental reduction in the amount of diesel fuel required for catalyst disposal and replacement trips because fewer engines would be retrofitted with oxidation catalysts. As indicated in the analysis of PAR 1110.2, most of the adverse energy impacts are anticipated as a result of modifications at biogas facilities. Because the concentration provision in Alternative B is identical to the concentration provision in PAR 1110.2, potential adverse energy impacts from compliance activities at biogas facilities would be similar to those identified for PAR 1110.2. Potential adverse energy impacts include increased demand for diesel resulting from truck trips associated with removal and replacement of catalysts and ammonia delivery. Alternative B would allow the same compliance options at biogas facilities that are available for PAR 1110.2. As a result, Alternative B would generate energy impacts equivalent to PAR 1110.2. Like PAR 1110.2 Alternative B would increase demand for electricity, while reducing demand for natural gas. Further, losses of renewable energy in one sector would be made up by increases in renewable energy in another sector. Therefore, overall Alternative B, like PAR 1110.2, is not expected to generate significant adverse energy impacts.

### **Hazards/Hazardous Materials**

Hazards and hazardous materials impacts identified for PAR 1110.2 were associated with compliance activities at biogas facilities. Because Alternative B was analyzed using the

same compliance scenarios as PAR 1110.2, hazard/hazardous materials impacts would be equivalent to those identified for PAR 1110.2. Secondary hazards and hazardous materials impacts are associated only with control technologies (in particular retrofitting engines with SCR or replacing engines with LNG plants) expected to be used at biogas facilities.

Biogas facilities that install SCR or NOxTech systems would have potential adverse impacts from ammonia accidental releases. The furthest distance to the significant threshold ERPG2 concentration of 150 ppm of ammonia modeled would be 0.1 miles from the catastrophic failure of an ammonia storage tank. ERPG-2 concentrations are the maximum airborne concentration below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair their ability to take protective action. For the off-site impacts analysis, it was assumed that ammonia storage tanks would be constructed close to where existing ICE is located. Based on GIS modeling and surveys of biogas facilities, there would be facilities with ammonia tanks that are less than 0.1 miles from the property line. Some facilities have sensitive receptors within 0.1 miles of ammonia storage sites; therefore Alternative B is significant for accidental releases from ammonia storage.

The transport of aqueous ammonia is not likely to significantly impact receptors because conditions are not typically that would result in pooling of the aqueous ammonia. For example, an accidental release of aqueous ammonia on roadways is unlikely to result in pooling as there are no barriers to impede flow, so it would likely flow off roads onto porous ground where it would be absorbed or underground into storm drains.

Biogas facilities operators who install LNG plants would have potential adverse impacts from LNG accidental releases. The furthest distance to the significance threshold of one psi overpressure is 0.2 mile. One psi overpressure may cause partial demolition of houses, shattering of glass windows and serious injuries to people. For the off-site impacts analysis, it was assumed that LNG storage tanks would be constructed close to where the existing ICEs are located. Based on GIS modeling and surveys of biogas facilities, there would be facilities with LNG tanks that are less than 0.1 mile from the property line. Therefore, facility operators who choose to replace ICEs with biogas to LNG plants could create significant adverse impacts to receptors within 0.2 mile of the LNG storage tanks.

No facilities have schools within one-quarter mile; therefore, Alternative D would not significantly adversely affect schools within a quarter mile. No facilities are within two miles of an airport or airfield; therefore, would not adversely significantly impact those working at or near an airport or airfield. However, facilities would have sensitive receptors within 0.2 mile of LNG storage sites. No mitigation measures were identified that could reduce this potential adverse hazard impact to less than significant.

During transport, LNG is compressed by refrigeration, and it is not flammable in its liquid state. However, an accident could produce a pool of LNG that could evaporate and ignite, forming a flammable cloud, BLEVE, or a ruptured tank could rocket away and ignite. Receptors within 0.3 mile of the delivery truck may be adversely affected by any of these scenarios. A tank that ruptures and rockets away could adversely affect a zone covering

greater than 0.3 mile around the tank from the initial accident site to the final resting place of the LNG delivery tank. Therefore, Alternative B is considered significant for accidental releases of LNG during transport.

### **Solid/Hazardous Waste**

It is anticipated that Alternative B would generate less solid/hazardous wastes than PAR 1110.2, because fewer oxidation catalysts would be installed as a result of the compliance exception extended to non-biogas facilities. Metals from oxidation catalysts may be recycled, but eventually would become waste. While it is assumed that oxidation catalysts would be considered “designated waste” that can be disposed of in Class II or III landfills, some oxidation catalyst may be classified as hazardous waste requiring disposal in Class I landfills.

Similar to the analysis for PAR 1110.2, SCAQMD staff analyzed different scenarios in which it was assumed that all biogas ICEs would be replaced with alternative compliance options such as turbines, biogas to LNG plants, etc. Since no other scenarios provide a more conservative analysis than total removal and replacement of existing engines, these same scenarios were applied to the analysis of Alternative B.

It is expected that Alternative B would generate incrementally less solid/hazardous waste impacts than PAR 1110.2 because of the exception applied to non-biogas engines. Overall Alternative B, like PAR 1110.2, is not expected to generate significant adverse solid/hazardous waste impacts.

## **Alternative C – Enhanced Enforcement Alternative**

### **Aesthetics**

Alternative C would maintain the same pollution control requirements that are currently in Rule 1110.2. As a result, Alternative C would not substantially change the size or configuration of existing engines onsite. Alternative C, like PAR 1110.2 would require operators of specified categories of ICEs to install CEMs, requiring minor construction at affected facilities. Neither the construction of CEMs nor operation of this equipment is expected to change the visual character of affected facilities. Alternative C would likely require additional infrastructure for source testing and additional monitoring equipment. The additional infrastructure and monitoring equipment is also not expected to change the visual character of the affected facilities or surroundings. Therefore, Alternative C, like PAR 1110.2, is not expected to create significant adverse aesthetics impacts. Aesthetics impacts from implementing Alternative C would be less than for PAR 1110.2 since alternative compliance options that may occur under PAR 1110.2 may be slightly more noticeable.

### **Air Quality**

Because Alternative C does not impose additional concentration limit requirements like the proposed project and other alternatives, but does impose measures such as installation of CEMs, potential air quality impacts from construction activities would be substantially less than for the proposed project. Relative to operational activities, Alternative C is expected to

generate emission reductions compared to the baseline inventory by enhancing enforcement of the existing emission control requirements through installation of CEMs, additional inspection and monitoring, etc. Alternative C, however, may generate diesel exhaust emission during operation from source testing vehicle trips (source testing vehicles may be gasoline powered). However, SCAQMD staff expects only one additional source test per facility every two years. Health risk from a single vehicle trip every other year would be negligible.

Table 5-14 presents the inventory of emissions from all engines that would be subject to Alternative C by year in which different requirements become effective. As with PAR 1110.2, construction and operational emissions are expected to overlap. Table 5-15 shows the net effect on emissions from affected engines, taking into consideration both construction emission increases and emission reductions anticipated from enhanced enforcement activities.

**Table 5-14**  
**Total Emissions Inventory by Year**  
**Anticipated from Implementing Alternative C**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,152	54,086	2,489	547	880.8	878.6	1,237,862
	<u>9,155</u>	<u>54,104</u>	<u>2,494</u>	<u>547</u>	<u>881.3</u>	<u>879.1</u>	
<b>2009</b>	6,853	22,683	1,848	547	874.0	872.0	1,246,022
	<u>6,856</u>	<u>22,701</u>	<u>1,853</u>	<u>547</u>	<u>874.5</u>	<u>872.5</u>	
<b>2010</b>	6,864	22,233	1,519	545	874.0	872.0	1,238,803
	<u>6,867</u>	<u>22,251</u>	<u>1,524</u>	<u>545</u>	<u>874.5</u>	<u>872.5</u>	
<b>2011</b>	6,820	21,989	1,517	545	874.0	872.0	1,238,875
	<u>6,823</u>	<u>22,007</u>	<u>1,522</u>	<u>545</u>	<u>874.5</u>	<u>872.5</u>	

As indicated in Table 5-15, Alternative C is not expected to create significant adverse air quality impacts. As already noted in the project description for Alternative C, since Alternative C does not include additional emission control requirements that could result in retrofitting existing engines with SCR, no ammonia slip emissions would be generated. Consequently, Alternative is concluded to be the least toxic alternative.

### **Energy**

Alternative C would have minor adverse energy impacts, from additional monitoring equipment and vehicle travel associated with additional source testing. Approximately 567 MW-hours per year would be required for CEMS, ATRC and analyzers. Based on the available 120,194 GW-hours per year in southern California, this would be less than one percent of the available electricity ( $4.73 \times 10^{-7}$  percent).

**Table 5-15**  
**Net Emissions Effect from Implementing Alternative C**  
**Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
2008	(43)	(157)	(3)	(5)	3.9	3.4	(12,184)
	(40)	(139)	1	(4)	4.4	3.9	
2009	(2,334)	(32,010)	(974)	(6)	(3)	(3)	(11,244)
	(2,339)	(31,542)	(640)	(4)	(2.4)	(2.7)	
2010	(2,334)	(32,010)	(974)	(6)	(3)	(3)	(11,244)
	(2,328)	(31,992)	(969)	(6)	(2.4)	(2.7)	
2011	(2,375)	(32,254)	(976)	(6)	(3)	(3)	(11,172)
	(2,372)	(32,236)	(971)	(6)	(2.4)	(2.7)	

Numbers in parentheses represent emission reductions.

Since Alternative C would not require emissions control equipment, it would not affect electrical production at biogas facilities. Since it would not affect electrical production at biogas facilities it would not affect renewable energy goals.

Alternative C has a higher natural gas allowance in connection with the combustion of biogas or digester gas compared to PAR 1110.2, 25 percent versus 10 percent respectively. As a result, Alternative C is not expected to reduce natural gas usage at affected biogas facilities as would be the case under PAR 1110.2. Regardless of this effect and, based on the above analysis, Alternative C is not expected to generate significant adverse energy impacts.

### **Hazards/Hazardous Materials**

The analysis of potential hazard/hazardous materials impacts from implementing PAR 1110.2 in Chapter 4 concluded that the alternative compliance option of replacing existing biogas ICEs with biogas to LNG plants could produce significant adverse explosion and fire impacts to nearby receptors. Because Alternative C would impose no additional compliance requirements, it would not be expected to generate any significant adverse hazard impacts compared to PAR 1110.2. Further, hazards would not be generated from increased monitoring and source testing. Therefore, Alternative C is not expected to create significant adverse hazards/hazardous materials impacts.

### **Solid/Hazardous Waste**

Chapter 4 concluded that, although there could be some solid waste impacts from disposal of ICE that are replaced with alternative compliance options and disposal of spent catalysts, local landfills and/or hazardous waste landfills in California could accommodate this increase in waste disposal. As a result, solid/hazardous waste impacts were concluded to be less than significant. Because Alternative C would impose no additional compliance requirements and no additional solid or hazardous waste would be generated from increased

monitoring and source testing, Alternative C would not be expected to generate any significant adverse solid or hazardous waste impacts compared to PAR 1110.2.

## **Alternative D – BACT Alternative**

### **Aesthetics**

Alternative D would have similar adverse aesthetic impacts to PAR 1110.2. Alternative D may have incrementally greater adverse visual impacts at both non-biogas and biogas facilities, because the lower CO compliance limit may require larger control units at affected facilities. While CO control equipment may be physically larger, they would generally have the same visual characteristics and, therefore, would be indistinguishable from the units used to comply with PAR 1110.2. It is possible that there may be additional costs associated with controlling CO emissions to a lower concentration and, as a result, could create a greater impetus for operators to replace ICEs with alternative systems. However, the analysis of impacts from implementing PAR 1110.2 already assumed that operators of all affected biogas engines would replace ICEs with alternative systems. This same assumption would apply to Alternative D as a worst-case. Therefore, since the worst-case scenarios for PAR 1110.2 and Alternative D are the same, the worst-case adverse impacts are considered to be equivalent. For example, under either PAR 1110.2 or Alternative D operators of biogas engines could potentially retrofit engines with control systems (SCR, NOxTech, etc.) or replace ICEs with alternative compliance options (microturbines, turbines, or biogas LNG plants). As a result, the worse-case adverse impacts from implementing Alternative D would be similar those identified from implementing PAR 1110.2. Therefore, it is concluded that Alternative D could create potentially significant adverse aesthetics impacts.

### **Air Quality**

#### **Construction**

Alternative D would likely require more construction than PAR 1110.2, since Alternative D does not include a low usage exemption from compliance limits, but does require a lower CO compliance limit of 70 ppm than PAR 1110.2 (250 ppm). However, Alternative D would add an additional two years to the compliance dates proposed in PAR 1110.2. Operators who have existing equipment that is less than 10 years old in 2008 would receive an additional two years to comply with the proposed emission concentration requirements. An additional two years to comply with the final concentration requirements would result in fewer construction activities overlapping, thus, potentially reducing peak day construction impacts compared to PAR 1110.2.

#### **Operational**

Alternative D would generate the same NOx and VOC emission reductions as PAR 1110.2, but is expected to achieve greater CO emission reductions than PAR 1110.2 because the CO compliance limit under Alternative D is 70 ppm, which is lower than the CO limit for PAR 1110.2. The control technologies used to reduce NOx and VOC emissions will also reduce CO emissions. It is expected that these technologies would reduce CO to 70 ppm; however,

facility operators have stated that it would be difficult to keep all three pollutants under the compliance limits of Alternative D.

Since CO is a product of incomplete combustion, the lower CO concentration compliance limit may generate greater CO<sub>2</sub> emissions. Assuming that the same number of non-biogas engines are replaced with electric motors as would be the case under PAR 1110.2, CO<sub>2</sub> emission reduction benefits under Alternative would be less than anticipated under PAR 1110.2.

Because the final biogas concentration limit compliance dates for Alternative D are delayed by two years with the natural life allowance compared to PAR 1110.2, anticipated emission reductions would occur later. Allowing an additional two years to comply with the emission concentration requirements in Alternative D may allow the emergence of new air pollution control technologies that are more efficient and with fewer secondary impacts than currently available control technologies. Such advances in technology are not currently reasonably foreseeable and, as a result, the analysis of impacts for Alternative D assumes the same technologies will be used as under PAR 1110.2.

The air quality effects of implementing Alternative D are presented in the same way as they were for PAR 1110.2. Tables 5-16 through 5-20 present the total emissions inventory by compliance year that takes into consideration the declining operating emissions inventory from affected equipment reducing emissions to comply with Alternative D and increased construction emissions from installing air pollution control and monitoring equipment or installing alternative compliance technologies. Table 5-16 shows the remaining emissions by compliance year and construction emissions for the compliance option of all biogas plant operators retrofitting using SCR. Table 5-17 shows the remaining emissions by compliance year and construction emissions for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 5-18 shows the remaining emissions by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with microturbines. Table 5-19 shows the remaining emissions by compliance year and construction emissions for the compliance option of biogas operators replacing ICEs with digester plant and LNG plants at landfills. Table 5-20 shows the remaining emissions by compliance year and construction emissions for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants.



**Table 5-16**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the SCR Compliance**  
**Option for Biogas Facilities under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	15,818	1,267	534	844	842
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,591	11,733	1,200	529	834	831
	<u>5,596</u>	<u>11,766</u>	<u>1,209</u>	<u>530</u>	<u>835</u>	<u>832</u>
<b>2012</b>	5,420	11,657	1,177	528	825	823
<b>2014</b>	3,706	3,504	425	74	697	696
<b>2015</b>	3,712	3,500	423	74	697	696

**Table 5-17**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Gas Turbines Option**  
**for Biogas Facilities under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	15,818	1,267	534	844	842
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,586	11,731	1,199	529	833	831
	<u>5,591</u>	<u>11,764</u>	<u>1,208</u>	<u>530</u>	<u>834</u>	<u>832</u>
<b>2012</b>	5,444	11,784	1,189	529	832	830
<b>2014</b>	4,878	5,532	502	538	1,019	1,017
<b>2015</b>	4,884	5,527	500	538	1,019	1,017

**Table 5-18**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Microturbine Compliance Option for Biogas Facilities under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	15,818	1,267	534	844	842
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	5,586	11,731	1,199	529	833	831
	<u>5,591</u>	<u>11,764</u>	<u>1,208</u>	<u>530</u>	<u>834</u>	<u>832</u>
<b>2012</b>	5,463	11,854	1,196	529	837	835
<b>2014</b>	3,913	4,344	607	538	760	758
<b>2015</b>	3,919	4,339	605	538	760	758

**Table 5-19**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Gas Turbines at Digester Gas Facilities and LNG Facilities at Landfills Compliance Option for Biogas Facilities Under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	15,818	1,267	534	844	842
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	6,072	11,931	1,257	529	872	857
	<u>6,077</u>	<u>11,964</u>	<u>1,266</u>	<u>530</u>	<u>873</u>	<u>858</u>
<b>2012</b>	5,944	12,230	1,267	529	896	882
<b>2014</b>	4,742	4,862	546	211	911	896
<b>2015</b>	4,373	4,692	495	211	878	876

**Table 5-20**  
**Net Criteria Emission Inventories from Non-biogas Facilities and the Microturbines at**  
**Digester Gas Facilities and LNG Facilities at Landfills Compliance Option for Biogas**  
**Facilities under Alternative D**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>
<b>2009</b>	6,410	22,399	1,790	543	858	856
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>
<b>2010</b>	5,964	15,818	1,267	534	844	842
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>
<b>2011</b>	6,072	11,931	1,257	529	872	857
	<u>6,077</u>	<u>11,964</u>	<u>1,266</u>	<u>530</u>	<u>873</u>	<u>858</u>
<b>2012</b>	5,963	12,280	1,272	529	899	885
<b>2014</b>	4,206	3,707	483	75	736	722
<b>2015</b>	3,837	3,537	433	74	703	702

Table 5-21 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of all biogas plant operators retrofitting using SCR. Table 5-22 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of all biogas plant operators replacing ICEs with gas turbines. Table 5-23 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of biogas operators replacing ICEs with microturbines. Table 5-24 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of biogas operators replacing ICEs with digester plant and LNG plants at landfills. Table 5-25 shows the net emissions effect (emission reduction) by compliance year, which includes construction emissions, for the compliance option of operators replacing ICEs with microturbines and landfill gas facility operators replacing ICEs with LNG plants.

**Table 5-21**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Installing SCR at All Biogas Plants -Total Compared to Baseline under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2011</b>	(3,603)	(42,510)	(1,293)	(23)	(43)	(44)
	(3,598)	(42,477)	(1,284)	(22)	(42)	(43)
<b>2012</b>	(3,775)	(42,586)	(1,315)	(23)	(52)	(52)
<b>2014</b>	(5,489)	(50,739)	(2,068)	(477)	(180)	(180)
<b>2015</b>	(5,483)	(50,743)	(2,070)	(477)	(179)	(179)

Numbers in parentheses represent emission reduction.

**Table 5-22**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Gas Turbines at All Biogas Plants -Total Compared to Baseline under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106)	(334)	(23)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(38,425)	(1,194)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2011</b>	(3,609)	(42,512)	(1,294)	(23)	(43)	(44)
	(3,603)	(42,479)	(1,285)	(22)	(43)	(43)
<b>2012</b>	(3,751)	(42,459)	(1,304)	(23)	(44)	(45)
<b>2014</b>	(4,317)	(48,711)	(1,991)	(13)	142	142
<b>2015</b>	(4,311)	(48,716)	(1,993)	(13)	142	142

Numbers in parentheses represent emission reduction.

**Table 5-23**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Microturbines at All Biogas Plants -Total Compared to Baseline under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(406)	(334)	(22)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2011</b>	(3,609)	(42,512)	(1,294)	(23)	(43)	(44)
	(3,603)	(42,479)	(1,285)	(22)	(43)	(43)
<b>2012</b>	(3,732)	(49,389)	(1,297)	(22)	(40)	(40)
<b>2014</b>	(5,282)	(49,899)	(1,886)	(13)	(117)	(117)
<b>2015</b>	(5,275)	(49,904)	(1,888)	(13)	(117)	(117)

Numbers in parentheses represent emission reduction.

**Table 5-24**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Gas Turbines at Digester Gas Facilities and LNG Facilities at Landfills -Total Compared to Baseline under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(406)	(334)	(22)	(7.5)	(0.1)	0.4
	(100)	(301)	(14)	(6.9)	0.8	0.4
<b>2009</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)
<b>2011</b>	(3,123)	(42,312)	(1,236)	(22)	(5)	(18)
	(3,117)	(42,279)	(1,227)	(22)	(4)	(17)
<b>2012</b>	(3,251)	(42,013)	(1,226)	(22)	19.6	7.24
<b>2014</b>	(4,453)	(49,381)	(1,947)	(340)	33.7	21.30
<b>2015</b>	(4,821)	(49,551)	(1,998)	(340)	1.2	0.75

Numbers in parentheses represent emission reduction.

**Table 5-25**  
**Net Criteria Emission Effects from Non-Biogas Facilities and Microturbines at Digester Gas Facilities and LNG Facilities at Landfills -Total Compared to Baseline under Alternative D**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day
<b>2008</b>	(106) <u>(100)</u>	(334) <u>(301)</u>	(22) <u>(14)</u>	(7.5) <u>(6.9)</u>	(0.1) <u>0.8</u>	0.4 <u>0.4</u>
<b>2009</b>	(3,231) <u>(3,225)</u>	(38,425) <u>(38,392)</u>	(1,226) <u>(1,217)</u>	(18) <u>(17)</u>	(33) <u>(32)</u>	(33) <u>(32)</u>
<b>2010</b>	(3,231) <u>(3,225)</u>	(38,425) <u>(38,392)</u>	(1,226) <u>(1,217)</u>	(18) <u>(17)</u>	(33) <u>(32)</u>	(33) <u>(32)</u>
<b>2011</b>	(3,123) <u>(3,117)</u>	(42,312) <u>(42,279)</u>	(1,236) <u>(1,227)</u>	(22) <u>(22)</u>	(5) <u>(4)</u>	(18) <u>(17)</u>
<b>2012</b>	(3,232)	(41,963)	(1,220)	(22)	22	10
<b>2014</b>	(4,989)	(50,536)	(2,009)	(477)	(141)	(153)
<b>2015</b>	(5,358)	(50,706)	(2,060)	(477)	(173)	(174)

Numbers in parentheses represent emission reduction.

As can be seen in Table 5-22, the worst-case operational emissions scenario would be if all biogas operators replace ICEs with gas turbines. In this scenario, PM2.5 emissions exceed the applicable operational significance threshold. No other compliance scenarios resulted in significant adverse air quality impacts. Air quality impact conclusions for Alternative D are the same as the air quality impact conclusions for PAR 1110.2.

Similar to the air quality analysis for PAR 1110.2, the air quality analysis for Alternative D includes the assumption that operators of 169 non-biogas engines would replace existing engines with electric motors. Based on this assumption, it is expected that Alternative D would also reduce CO2 emissions. Similar to PAR 1110.2, Alternative D would require a technology assessment, but it would be required in 2012 instead of 2010. The technology assessment would include the number of non-biogas engines that have been replaced with electric motors. As with PAR 1110.2, any shortfalls in CO2 emission reductions would be made up by other measures identified at the time the technology assessment is completed and presented to the Governing Board. For overall CO2 reductions, approximately 27 engines would need to be replaced. Table 5-26 summarizes the overall CO2 reduction analysis.

**Table 5-26**  
**Average Number of ICE Engines Replaced with Electric Motors Needed for CO<sub>2</sub>**  
**Reductions under Alternative D**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor for CO <sub>2</sub> Reductions
SCR	(248,723)	32,719	281,443	1,665	20
Replace ICE with Gas Turbine	(100,168)	18,664	118,831	703	27
Replace ICE Microturbine	(261,981)	19,462	281,443	1,665	12
Replace LFG w LNG, DG w Turbines	(1,223,610)	(942,167)	281,443	1,665	0
Replace LFG w LNG, DG w Microturbines	(1,222,851)	(941,408)	281,443	1,665	0

Electric motors were assumed to have a ten year lifespan.  
 Numbers in parentheses represent emission reductions.

### **Energy**

In practice, more biogas facility operators may replace ICEs with alternative compliance technologies such as boilers, turbines, microturbines, electrification, and biogas to LNG plants under Alternative D than PAR 1110.2. However, because actual compliance options were not known and to provide a conservative analysis for PAR 1110.2, SCAQMD staff analyzed different scenarios in which it was assumed that all ICEs would be replaced with alternative compliance options such as turbines, biogas to LNG plants, etc. Since no other scenarios provide a more conservative analysis than total removal and replacement of existing engines, these same scenarios were applied to the analysis of Alternative D. As a result, Alternative D would generate energy impacts similar to PAR 1110.2. Like PAR 1110.2 Alternative D would increase demand for electricity, while reducing demand for natural gas. Further, losses of renewable energy in one sector would be made up by increases in renewable energy in another sector. Therefore, overall Alternative D, like PAR 1110.2, is not expected to generate significant adverse energy impacts.

### **Hazards/Hazardous Materials**

Because Alternative D was analyzed using the same compliance scenarios as PAR 1110.2, hazard/hazardous materials impacts would be equivalent to those identified for PAR 1110.2. ICEs at non-biogas facilities would only require monitoring equipment or oxidation catalysts. Neither of these compliance requirements at non-biogas facilities includes use of hazardous materials that would adversely affect the public. Secondary hazards and hazardous materials impacts are associated only with control technologies (in particular retrofitting engines with SCR or replacing engines with LNG plants) expected to be used at biogas facilities.

Biogas facility operators could install SCR on existing ICEs or replace ICEs with biogas to LNG plants under either Alternative D or PAR 1110.2. The furthest distance to the

significant threshold ERPG2 concentration of 150 ppm of ammonia modeled would be 0.1 miles from the catastrophic failure of an ammonia storage tank. ERPG-2 concentrations are the maximum airborne concentration below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair their ability to take protective action. Ammonia storage tanks if installed within 0.1 mile of the property boundary may significantly adversely impact sensitive or residential receptors within 0.1 mile of a catastrophic accidental failure of the ammonia storage tank.

The transport of aqueous ammonia is not likely to significantly impact receptors because conditions are not typically that would result in pooling of the aqueous ammonia. For example, an accidental release of aqueous ammonia on roadways is unlikely to result in pooling as there are no barriers to impede flow, so it would likely flow off roads onto porous ground where it would be absorbed or underground into storm drains.

Biogas facilities operators who install LNG plants would have potential adverse impacts from LNG accidental releases. The furthest distance to the significance threshold of one psi overpressure is 0.2 mile. One psi overpressure may cause partial demolition of houses, shattering of glass windows and serious injuries to people. For the off-site impacts analysis, it was assumed that LNG storage tanks would be constructed close to where the existing ICEs are located. Based on GIS modeling and surveys of biogas facilities, there would be facilities with LNG tanks that are less than 0.1 mile from the property line. Therefore, facility operators who choose to replace ICEs with biogas to LNG plants could create significant adverse impacts to receptors within 0.2 mile of the LNG storage tanks.

No facilities have schools within one-quarter mile; therefore, Alternative D would not significantly adversely affect schools within a quarter mile. No facilities are within two miles of an airport or airfield; therefore, would not adversely significantly impact those working at or near an airport or airfield. However, facilities would have sensitive receptors within 0.2 mile of LNG storage sites. No mitigation measures were identified that could reduce this potential adverse hazard impact to less than significant.

During transport, LNG is compressed by refrigeration, and it is not flammable in its liquid state. However, an accident could produce a pool of LNG that could evaporate and ignite, forming a flammable cloud, BLEVE, or a ruptured tank could rocket away and ignite. Receptors within 0.3 mile of the delivery truck may be adversely affected by any of these scenarios. A tank that ruptures and rockets away could adversely affect a zone covering greater than 0.3 mile around the tank from the initial accident site to the final resting place of the LNG delivery tank. Therefore, Alternative D is considered significant for accidental releases of LNG during transport.

### **Solid/Hazardous Waste**

The replacement or installation of oxidation catalyst for non-biogas facilities would be the same for Alternative D and the existing project. However, in practice, more biogas facility operators may replace ICEs with alternative compliance technologies such as boilers, turbines, microturbines, electrification, and biogas to LNG plants under Alternative D than



PAR 1110.2. Because actual compliance options were not known and to provide a conservative analysis for PAR 1110.2, SCAQMD staff analyzed different scenarios in which it was assumed that all biogas ICEs would be replaced with alternative compliance options such as turbines, biogas to LNG plants, etc. Since no other scenarios provide a more conservative analysis than total removal and replacement of existing engines, these same scenarios were applied to the analysis of Alternative D. As a result, Alternative D would generate solid/hazardous waste impacts equivalent to PAR 1110.2. Overall Alternative D, like PAR 1110.2, is not expected to generate significant adverse solid/hazardous waste impacts.

### **Comparison of the Relative Merits of the Project Alternatives by Environmental Topic**

The following subsections summarize the effects of PAR 1110.2 and the project alternatives by environmental category.

#### **Aesthetics**

Alternative A would not be expected to generate any aesthetics impacts because it would not require any additional emission reductions or compliance modifications. Of the remaining alternatives, Alternative C is expected to generate less than significant aesthetic impacts because it only requires the addition of source testing infrastructure, CEMS, ATRCs and analyzers. The analysis of PAR 1110.2 concluded that it has the potential to generate significant adverse aesthetics impacts primarily from removal of ICEs and the installation of alternative technologies at biogas facilities. Because Alternatives B and D contain the same requirements as PAR 1110.2 for engines at biogas facilities, they would be expected to create significant adverse aesthetics impacts equivalent to PAR 1110.2.

#### **Air Quality**

Although Alternative D would generate the same NO<sub>x</sub> and VOC emission reductions as PAR 1110.2, Alternative D would generate more CO emission reductions than PAR 1110.2 because of the lower CO compliance limit (Table 5-27). Because Alternative B would extend the compliance exception for non-biogas engines, it would generate more emissions than PAR 1110.2. Alternative C does not contain any emission reduction requirements and, as a result, would generate as much emission reductions as the proposed project and other alternatives. However, because of the enforcement enhancements contained in Alternative C, it is expected to prevent or limit future violations of the existing emission concentration requirements in Rule 1110.2. Alternative A would have the least beneficial effect on air quality because, not only would it not produce any emission reductions, it contains no enhanced enforcement provisions that reduce future violations of the existing provisions in Rule 1110.2. The emissions in Table 5-27 represent the net effects of both construction emission increases, secondary operational emission increase impacts, and direct emission reductions from each potential project.

**Table 5-27**  
**Worst-Case Emissions Increases or Reductions**  
**from Each Alternative**

Description	Year	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day
Proposed Project	2014	(5,433)	(46,868)	(1,955)	(13.0)	142	142
Alternative A*	-	0	0	0	0	0	0
Alternative B	2014	(4,307)	(46,831)	(1,953)	(13.0)	142	142
Alternative C	2011	(43)	(157)	(3.3)	(4.7)	3.9	3.4
Alternative D	2015	(4,311)	(48,716)	(1,993)	(13.0)	142	142

Numbers in parentheses represent emission reductions.

\* Estimated excess emissions over the current Rule 1110.2 are reported for Alternative A.

### **Toxic Air Contaminate Emissions**

Alternative A is not expected to generate any additional air toxics because it imposes no additional requirements for affected engines. Alternative C would generate negligible (less than significant) cancer risks from diesel particulate exhaust from trucks used to visit sites for source testing. The reason for this conclusion is that increased source testing would add one additional trip to affected facilities every two years. The analysis of PAR 1110.2 concluded that the proposed project could generate significant adverse cancer risk impacts at biogas and non-biogas facilities where operators install emergency backup diesel engines. Cancer risk impacts from Alternatives B and D are expected to be equivalent to PAR 1110.2, since operators at the same biogas and non-biogas facility may install diesel emergency backup generators because existing ICEs may be replaced with alternative compliance options (e.g., LNG plants that also generate truck trips to pick up LNG).

### **Greenhouse Gas Emissions**

Neither Alternative A nor Alternative C is expected to reduce CO<sub>2</sub> emissions. Because the same assumptions were used for PAR 1110.2 and Alternative B regarding the number of non-biogas engines that would be replaced with electric motors and because secondary CO<sub>2</sub> emissions from construction equipment anticipated for these two alternatives are expected to be equivalent, both PAR 1110.2 and Alternative B are expected to generate similar CO<sub>2</sub> emission reductions. Alternative D could potentially generate greater CO<sub>2</sub> emission reductions based on mandatory replacement of existing non-biogas ICEs with electric motors for those engine categories identified where compliance would be less costly than retrofitting existing engines. It is anticipated, however, that Alternative D would generate lower CO<sub>2</sub> emission reductions than the proposed project, because it would implement a lower CO concentration requirement. Reducing CO emissions using an oxidation catalyst increases CO<sub>2</sub> emissions.

The technology assessment required for PAR 1110.2 and all alternatives (except Alternative A) would verify the actual number of non-biogas engines replaced with electric motors and associated CO<sub>2</sub> emission reductions. Any CO<sub>2</sub> emission reduction shortfalls are expected to be made up through other CO<sub>2</sub> emission reduction programs.

### **Hazards/Hazardous Materials**

Neither Alternative A nor Alternative C would require the use of hazardous materials that could generate significant adverse hazard/hazardous materials impacts. The hazards analysis for PAR 1110.2 concluded significant adverse hazard impacts could occur at biogas facilities where operators retrofit existing equipment with SCR units or replace existing engines with LNG plants. For example, the toxic end point from aqueous ammonia would be 0.1 mile, which could expose receptors to ERPG 2 levels of ammonia, which is considered significant. Relative to LNG plants, the distance of a one psi shockwave from an LNG tank failure could be 0.2 mile. Adverse impacts from an accidental upset of an LNG truck could be up to 0.3 mile. Because receptors are expected to be located within these impact zones, this impact is considered to be significant. Because Alternatives B and D have the same requirements for biogas engines as PAR 1110.2, it is anticipated that hazard impacts under these alternatives would be equivalent to the proposed project. Similarly, the proposed project and Alternatives B and D may also generate significant adverse hazard impacts from the accidental upset of LNG transport trucks.

### **Solid/Hazardous Waste**

Neither Alternative A nor Alternative C is expected to generate solid waste impacts. Alternative A imposes no additional requirements so no additional waste would be generated at affected facilities. Similarly, Alternative C does not contain any additional control requirements that would result in the generation of wastes. PAR 1110.2 and Alternatives B and D impose similar requirements that could generate additional wastes such as disposal of any existing emissions control equipment, catalyst, carbon, diesel fuel, etc. In spite of the potential for waste generation by PAR 1110.2 and Alternatives B and D, local or state landfills have the capacity to accommodate additional wastes produced by these proposals. Therefore, neither PAR 1110.2 nor any of the project alternatives have the potential to generate significant adverse solid/hazardous waste impacts.

## **CONCLUSION**

Because Alternative A would impose no additional control or compliance requirements, with the exception of air quality, it would not be expected to generate significant adverse impacts. Air quality was concluded to be significant for this alternative because it would not necessarily eliminate or limit future exceedances of existing Rule 1110.2 emission control requirements. Further, Alternative A would not accomplish the two primary objectives of the proposed project, which are to reduce future violations of existing compliance requirements through enhanced enforcement and further reduce NO<sub>x</sub>, CO and VOC emissions from affected engines.

Alternative B would extend and increase the low-use exception to non-biogas engines and extend the 15 minute averaging time during compliance testing to one hour. Impacts from implementing Alternative B would generally be similar to PAR 1110.2 because the greatest impacts occur from the various compliance options for biogas engines. Compliance options are essentially the same for both Alternative B and PAR 1110.2. Alternative B may generate lower construction emissions overall compared to PAR 1110.2, but because major construction activities are anticipated to occur at biogas facilities the maximum daily construction emissions may not be different from those identified for PAR 1110.2. CO<sub>2</sub>

emission reductions would be similar to CO<sub>2</sub> emission reductions identified for PAR 1110.2 because it is expected that replacing non-biogas ICEs with electric motors will be a less costly compliance option for the same categories of ICEs affected by both PAR 1110.2 and Alternative B. Aesthetic and hazards/hazardous material impacts are expected to be similar to PAR 1110.2 and, therefore, significant. Similarly, energy and solid/hazardous waste impacts are expected to be similar to PAR 1110.2 and, therefore, less than significant.

Alternative C would not impose any additional emission control requirements beyond what is currently required by existing Rule 1110.2. Alternative C would require additional CEMs, monitoring, testing, etc., to enhance enforcement of existing emission control requirements. Installation of CEMs, additional monitoring, etc., is not expected to change the visual character of the facility or surroundings and, therefore, would not be expected to generate significant adverse aesthetic impacts. Additional compliance requirements would not generate significant adverse construction or operational air quality impacts. Air toxics would be generated from source testing vehicle trips, but health risk from a single trip every other year would be negligible. Although Alternative C is not expected to achieve further emission reductions, it would not generate significant adverse air quality impacts. Adverse energy impacts from monitoring equipment and travel associated with additional source test are expected to be less than significant. Because Alternative C does not impose further emission control requirements, no facility operators would implement emission compliance options that could generate significant hazards/hazardous material impacts, because hazards would not be generated from increased monitoring and source testing. Alternative C would not generate significant solid or hazardous waste from monitoring or source testing. Therefore, Alternative C is not expected to create significant adverse impacts in any environmental topic areas.

Alternative D is expected to generate significant adverse environmental impacts similar to those identified for PAR 1110.2. Alternative D may incrementally increase adverse environmental impacts because larger or additional control may be required to meet the lower CO compliance concentration limits. CO<sub>2</sub> emission reductions would occur through the mandatory replacement of non-biogas engines with electric motors for categories for categories of engines where this compliance option is less costly than complying with the emission control requirements. While in practice Alternative D could generate greater adverse environmental impacts, the assumptions applied to PAR 1110.2 would also apply to Alternative D because these assumptions provide the most conservative analysis possible. Therefore, for this analysis the adverse environmental impacts from PAR 1110.2 and Alternative D are equivalent. Alternative D would be expected to create significant adverse aesthetics, air quality, and hazards/hazardous waste. Like PAR 1110.2, Alternative D would not be expected to create significant adverse energy or solid/hazardous waste impacts.

A comparison of the impacts from PAR 1110.2 and all project alternatives is presented in Table 5-28.

Pursuant to CEQA Guidelines §15126.6(e)(2), if the environmentally superior alternative is the no project alternative, the CEQA document shall also identify an environmentally superior alternative among the other alternatives. In the case of the alternatives to PAR

1110.2, the no project alternative is not considered to be the environmentally superior alternative. Alternative A – No Project Alternative, does not impose any additional requirements beyond those in existing Rule 1110.2 and as a result, does not generate any aesthetics, energy, hazards/hazardous materials, or solid/hazardous waste impacts. However, because Alternative A does not impose any compliance requirements to enhance enforcement, it would not necessarily prevent or limit future exceedances of the emission control requirements in existing Rule 1110.2. This is considered to be a significant adverse air quality impact. The only alternative that does not generate any significant adverse environmental impacts is Alternative C – Enhanced Enforcement, but it would not achieve the project objective of partially implementing 2007 AQMP Control Measure MCS-01 – Facility Modernization. While the proposed project is the staff's proposed project, the Governing Board may choose to adopt any of the alternatives in whole or in part in place of the proposed project, based on other considerations in addition to environmental concerns such as compliance costs, effects on future employment (jobs lost, for example), etc.

The *CEQA Guidelines §15126.6(e)(2)* requires the environmentally superior alternative to be identified. In addition, SCAQMD Environmental Justice Enhancement II-1 recommends that all SCAQMD CEQA assessments include a feasible project alternative with the lowest air toxics emissions. Excluding Alternative A, the No Project Alternative, Alternative C would be the environmentally superior and least toxic alternative, because it would not require additional controls which may have adverse toxic impacts and require additional vehicle trips, but it would not achieve the project objective of partially implementing 2007 AQMP Control Measure MCS-01 – Facility Modernization.

The proposed project is not the most environmentally superior project or least toxic alternative (Alternative C is both). However, the proposed project would completely fulfill the project objective of further reducing NO<sub>x</sub>, CO and VOC emissions from ICEs and partially implementing 2007 AQMP Control Measure MCS-01 – Facility Modernization, which Alternatives A and C do not, and is qualitatively environmentally better than Alternative D. PAR 1110.2 is preferred to Alternative B, because it would achieve greater reductions with similar adverse environmental impacts. While the proposed project is the staff preferred alternative, the Governing Board may choose to adopt any of the alternatives in whole or in part in place of the proposed project, based on other considerations in addition to environmental concerns such as compliance costs, effects on future employment (jobs lost, for example), etc.

**Table 5-28**  
**Comparison of Adverse Environmental Impacts of the Alternatives**

<b>Environmental Topic</b>	<b>Proposed Project</b>	<b>Alternative A (No Project)</b>	<b>Alternative B (Low Use)</b>	<b>Alternative C (<del>Compliance Only</del> Enhanced Compliance)</b>	<b>Alternative D (BACT)</b>
<b>Aesthetics</b>	Significant	Not significant no Impact	Significant less than PAR 1110.2	Not significant	Significant Equivalent to PAR 1110.2
<b>Air Quality</b> Criteria	Significant	Significant, greater than PAR 1110.2	Significant Equivalent to PAR 1110.2	Not significant, less than PAR 1110.2	Significant Equivalent to PAR 1110.2
Toxic	Significant	Not significant, less than PAR 1110.2	<del>Not s</del> Significant, same as PAR 1110.2	Not significant, less than PAR 1110.2	<del>Not s</del> Significant, same as PAR 1110.2
Greenhouse Gas	Not significant beneficial effect	Not significant no beneficial effect	Not significant equivalent to PAR 1110.2	Not significant no beneficial effect	Not significant less than PAR 1110.2
<b>Energy</b> Electricity	Not significant	Not significant no Impact	Not significant, same as PAR 1110.2	Not significant, less than PAR 1110.2	Not significant Equivalent to PAR 1110.2
Natural Gas	Not significant beneficial effect	Not significant less than PAR 1110.2	Not significant Equivalent to PAR 1110.2	Not significant, less than PAR 1110.2	Not significant Equivalent to PAR 1110.2
Diesel	Not significant	Not significant no Impact	Not significant, less than PAR 1110.2	Not significant, less than PAR 1110.2	Not significant Equivalent to PAR 1110.2
<b>Hazards/Hazardous Material</b>	Significant	Not significant no Impact	Significant, same as PAR 1110.2	Not significant, less than PAR 1110.2	Significant Equivalent to PAR 1110.2
<b>Solid/Hazardous Waste</b>	Not significant	Not significant no Impact	Not significant, same as PAR 1110.2	Not significant, same as PAR 1110.2	Not significant Equivalent to PAR 1110.2

**APPENDIX A (of the ~~Draft~~Final-EA)**

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**ABBREVIATIONS AND ACRONYMS**

**Table of Acronyms and Abbreviations**

<b>Acronym/Abbreviation</b>	<b>Description</b>
ACWA	Association of California Water Agencies
AFRC	Air-to-fuel ratio controller
AQMP	Air quality management plan
ASME	American Society Of Mechanical Engineers
ATCM	Airborne Toxic Control Measures
BACT	Best Available Control Technology
BARCT	Best available retrofit control technology
bph	Brake horsepower
BTU	British thermal unit
CARB	California Air Resources Board
Catox	Catalytic oxidation
CEMS	Continuous emission monitoring system
CEQA	California Environmental Quality Act
CI	Compression-ignition
CNG	Compressed natural gas
CO	Carbon monoxide
dBA	Decibels
EA	Environmental Assessment
EEF	electrical energy factor
EGR	Exhaust gas recirculation
ERPG	Emergency Response Planning Guideline
FY	Fiscal year
g	Gram
HHV	High heating value
I&M	Inspection and monitoring
ICE	Internal combustion engine
in	Inches
IS	Initial Study
k	Kilo
kW	Kilowatt
L	Concentration limit
LA DWP	Los Angeles Department of Water and Power
lb	Pound



**Table of Acronyms and Abbreviations (continued)**

<b>Acronym/Abbreviation</b>	<b>Description</b>
LPG	liquefied petroleum gas
m	Meter
MDAB	Mojave Desert Air Basin
µg	Micrograms
MM	Million
MMBtu	Million British thermal units
MMSCF	Million standard cubic feet
MTA	Los Angeles Metropolitan Transportation Agency
MWD	Metropolitan Water District
MW <sub>e</sub>	Electrical megawatt-hours
MW <sub>th</sub> -hours	Thermal megawatt-hours
NG	natural gas
NMHC	Non-methane hydrocarbon
NO <sub>x</sub>	Oxides of nitrogen
NSCR	Non-selective catalytic reduction
NSPS	New Source Performance Standards
O <sub>2</sub>	Oxygen
OSHA	Occupational Safety and Health Administration
O <sub>x</sub> Cat	Catalytic oxidation
PAR	Proposed amended rule
PERP	Portable Equipment Registration Program
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5microns in diameter
ppm	Parts per million
ppm <sub>dv</sub>	Parts per million, dry volume
ppm <sub>v</sub>	Parts per million by volume
PSC	Pre-stratified charge
R	Ratio
RACT	Retrofit available control technology
RECLAIM	Regional Clean Air Incentives Market
RICE	Reciprocating Internal Combustion Engines
ROG	Reactive organic gas

**Table of Acronyms and Abbreviations (continued)**

<b>Acronym/Abbreviation</b>	<b>Description</b>
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
scf	Standard cubic feet
SCR	Selective catalytic reduction
SI	Spark-ignited
SSAB	Salton Sea Air Basin
TAC	Toxic Air Contaminant
TWC	Three-way catalyst
VOC	Volatile organic compound
W	Watt
WD	Water District
wt	Weight

**APPENDIX B (of the ~~Draft~~Final EA)**

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**PROPOSED AMENDED RULE 1110.2**



(Adopted August 3, 1990)(Amended September 7, 1990)(Amended August 12, 1994)  
(Amended December 9, 1994)(Amended November 14, 1997)  
(Amended June 3, 2005)(Proposed Amendments December 14, 2007)

**PROPOSED AMENDED RULE 1110.2 EMISSIONS FROM GASEOUS- AND  
LIQUID-FUELED ENGINES**

(a) Purpose

The purpose of Rule 1110.2 is to reduce Oxides of Nitrogen (NO<sub>x</sub>), Volatile Organic Compounds (VOCs), and Carbon Monoxide (CO) from engines.

(b) Applicability

All stationary and portable engines over 50 rated brake horsepower (bhp) are subject to this rule.

(c) Definitions

For the purpose of this rule, the following definitions shall apply:

- (1) AGRICULTURAL STATIONARY ENGINE is a non-portable engine used for the growing and harvesting of crops or the raising of fowl or animals for the primary purpose of making a profit, providing a livelihood, or conducting agricultural research or instruction by an educational institution. An engine used for the processing or distribution of crops or fowl or animals is not an agricultural engine.
- (2) APPROVED EMISSION CONTROL PLAN is a control plan, submitted on or before December 31, 1992, and approved by the Executive Officer prior to November 14, 1997, ~~describing all actions and alternatives, including a schedule of increments of progress to meet or exceed the requirements or applicable emissions limitations in paragraph (d)(1) that~~ was required by subdivision (d) of this rule as amended September 7, 1990.
- (3) CERTIFIED SPARK-IGNITION ENGINES mean engines certified by California Air Resources Board (CARB) to meet emission standards in accordance with Title 13, Chapter 9, Article 4.5 of the California Code of Regulations (CCR).
- (4) EMERGENCY STANDBY ENGINE is an engine which operates as a temporary replacement for primary mechanical or electrical power during

- periods of fuel or energy shortage or while the primary power supply is under repair.
- (5) ENGINE is any spark- or compression-ignited internal combustion engine, including engines used for control of VOCs, but not including engines used for self-propulsion.
- (6) EXEMPT COMPOUNDS are defined in District Rule 102 - Definition of Terms.
- (7) FACILITY means any source or group of sources or other air contaminant emitting activities 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 by persons under common control), or an outer continental shelf (OCS) source as determined in Section 55.2 of Title 40, Part 55 of the Code of Federal Regulations (40 CFR Part 55). Such above-described groups, if noncontiguous, but connected only by land carrying a pipeline, shall not be considered one facility. Sources or installations involved in crude oil and gas production in Southern California Coastal or OCS Waters and transport of such crude oil and gas in Southern California Coastal or OCS Waters shall be included in the same facility which is under the same ownership or use entitlement as the crude oil and gas production facility on-shore.
- (8) LEAN-BURN ENGINE means an engine that operates with high levels of excess air and an exhaust oxygen concentration of greater than 4 percent.
- (98) LOCATION means any single site at a building, structure, facility, or installation. For the purpose of this definition, a site is a space occupied or to be occupied by an engine. For engines which are brought to a facility to perform maintenance on equipment at its permanent or ordinary location, each maintenance site shall be a separate location.
- (10) NET ELECTRICAL ENERGY means the electrical energy produced by a generator, less the electrical energy consumed by any auxiliary equipment necessary to operate the engine generator and, if applicable, any heat recovery equipment, such as heat exchangers.
- (119) NON-ROAD ENGINE is any engine, defined under 40 CFR Part 89, that does not remain or will not remain at a location for more than 12 consecutive months, or a shorter period of time where such period is representative of normal annual source operation at a stationary source that

resides at a fixed location for more than 12 months (e.g., seasonal operations such as canning facilities), and meets one of the following:

- (A) Is used in or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as a mobile crane); or
- (B) Is used in or on a piece of equipment that is intended to be propelled while performing its function (such as lawn mowers and string trimmers); or
- (C) By itself, or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Transportability includes, but is not limited to, wheels, skids, carrying handles, dolly, trailer, platform or mounting.

(12) OPERATING CYCLE means a period of time within which a round of regularly recurring events is completed, and cannot be stopped without the risk of endangering public safety or health, causing material damage to the equipment or product, or cannot be stopped due to technical constraints. Economic reasons alone will not be sufficient to extend this time period. The operating cycle includes batch processes that may start and finish several times within a twenty-four hour period, in which case each start to finish interval is considered a complete cycle.

(13) OXIDES OF NITROGEN (NO<sub>x</sub>) means nitric oxide and nitrogen dioxide.

(14) PORTABLE ENGINE is an engine that, by itself or in or on a piece of equipment, is designed to be and capable of being carried or moved from one location to another. Indications of portability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, platform or mounting. The operator must demonstrate the necessity of the engine being periodically moved from one location to another because of the nature of the operation.

An engine is not portable if:

- (A) the engine or its replacement remains or will reside at the same location for more than 12 consecutive months. Any engine, such as a back-up or stand-by engine, that replaces an engine at a location and is intended to perform the same function as the engine

being replaced, will be included in calculating the consecutive time period. In that case, the cumulative time of both engines, including the time between the removal of the original engine and installation of the replacement engine, will be counted toward the consecutive time period; or

- (B) the engine remains or will reside at a location for less than 12 consecutive months where such a period represents the full length of normal annual source operations such as a seasonal source; or
- (C) the engine is removed from one location for a period and then it or its equivalent is returned to the same location thereby circumventing the portable engine residence time requirements.

The period during which the engine is maintained at a designated storage facility shall be excluded from the residency time determination.

(154) RATED BRAKE HORSEPOWER (bhp) is the rating specified by the manufacturer, without regard to any derating, and listed on the engine nameplate.

(16) RICH-BURN ENGINE WITH A THREE-WAY CATALYST means an engine designed to operate near stoichiometric conditions with a catalytic control device that simultaneously reduces emissions of NO<sub>x</sub>, CO and VOC.

(172) STATIONARY ENGINE is an engine which is either attached to a foundation or if not so attached, does not meet the definition of a portable or non-road engine and is not a motor vehicle as defined in Section 415 of the California Vehicle Code.

(183) TIER 2 AND TIER 3 DIESEL ENGINES mean engines certified by CARB to meet Tier 2 or Tier 3 emission standards in accordance with Title 13, Chapter 9, Article 4 of the CCR.

(19) USEFUL HEAT RECOVERED means the waste heat recovered from the engine exhaust and/or cooling system that is put to productive use. The waste heat recovered may be assumed to be 100% useful unless the hot water, steam or other medium is vented to the atmosphere, or sent directly to a cooling tower or other unproductive use.

(2014) VOLATILE ORGANIC COMPOUND (VOC) is as defined in Rule 102.

(d) Requirements

- (1) Stationary Engines ~~Emission Limits~~:



- (A) Operators of stationary engines with an amended Rule 1110.1 Emission Control Plan submitted by July 1, 1991, or an Approved Emission Control Plan, designating the permanent removal of engines or the replacement of engines with electric motors, in accordance with subparagraph (d)(1)(B), shall do so by December 31, 1999, or not operate the engines on or after December 31, 1999 in a manner that exceeds the emission concentration limits listed in Table I:

TABLE I ALTERNATIVE TO ELECTRIFICATION CONCENTRATION LIMITS		
NO <sub>x</sub>	VOC	CO
(ppmvd) <sup>1</sup>	(ppmvd) <sup>1,2</sup>	(ppmvd) <sup>1</sup>
11	30	70

<sup>1</sup> Parts per million by volume, cCorrected to 15% oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Parts per million by volume, mMeasured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.

- (B) The operator of any other stationary engine subject to this rule shall
- (i) Remove such engine permanently from service or replace the engine with an electric motor, or
  - (ii) Not operate the engine in a manner that exceeds the emission concentration limits listed in TableABLE II.

TABLE II CONCENTRATION LIMITS		
NO <sub>x</sub> (ppmvd) <sup>1</sup>	VOC (ppmvd) <sup>2</sup>	CO (ppmvd) <sup>1</sup>
(ppm) <sup>1</sup>	(ppm) <sup>1,2</sup>	(ppm) <sup>1</sup>
<u>bhp ≥ 500: 36</u>	250	2000
<u>bhp &lt; 500: 45</u>		
<u>CONCENTRATION LIMITS</u> <u>EFFECTIVE JULY 1, 2010</u>		

<u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u>	<u>VOC (ppmvd)<sup>2</sup></u>	<u>CO (ppmvd)<sup>1</sup></u>
<u>bhp ≥ 500: 11</u>	<u>bhp ≥ 500: 30</u>	<u>bhp ≥ 500: 250</u>
<u>bhp &lt; 500: 45</u>	<u>bhp &lt; 500: 250</u>	<u>bhp &lt; 500: 2000</u>
<b><u>CONCENTRATION LIMITS</u></b>		
<b><u>EFFECTIVE JULY 1, 2011</u></b>		
<u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u>	<u>VOC (ppmvd)<sup>2</sup></u>	<u>CO (ppmvd)<sup>1</sup></u>
<u>11</u>	<u>30</u>	<u>250</u>

<sup>1</sup> Parts per million by volume, cCorrected to 15% oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Parts per million by volume, mMeasured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.

The concentration limits effective on and after July 1, 2010 shall not apply to engines that operate less than 500 hours per year or use less than 1 x 10<sup>9</sup> British Thermal Units (Btus) per year (higher heating value) of fuel.

If the operator of a two-stroke engine equipped with an oxidation catalyst and insulated exhaust ducts and catalyst housing demonstrates that the CO and VOC limits effective on and after July 1, 2010 are not achievable, then the Executive Officer may, with United States Environmental Protection Agency (EPA) approval, establish technologically achievable, case-by-case CO and VOC limits in place of the concentration limits effective on and after July 1, 2010. The case-by-case limits shall not exceed 250 ppmvd VOC and 2000 ppmvd CO.

If the operator of an engine that uses non-pipeline quality natural gas demonstrates that due to the varying heating value of the gas a longer averaging time is necessary, the Executive Officer may establish for the engine a longer averaging time, not to exceed six hours, for any of the concentration limits of Table II. Non-pipeline quality natural gas is a gas that does not meet the gas specifications of the local gas utility and is not supplied to the local gas utility.

(C) Notwithstanding the provisions in subparagraph (d)(1)(B), the operator of any stationary engine fired by 90% or more of landfill or digester gas (biogas), based on the monthly heat input (higher heating value) of the fuels, described in Table III shall not operate the engine in a manner that exceeds ~~an~~the emission concentration limits of Table III, provided that the facility monthly average biogas useage by the biogas engines is 90% or more, based on the higher heating value of the fuels used. The calculation of the monthly facility biogas use percentage may exclude natural gas fired during: any electrical outage at the facility; a Stage 2 or higher electrical emergencies called by the California Independent System Operator Corporation; and when a sewage treatment plant activates an Emergency Operations Center or Incident Command System, as part of an emergency response plan, because of either high influent flows caused by precipitation or a disaster. ~~2000 ppm by volume of CO corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes, or the emission concentration limits for VOC as carbon or NOx specified by the following formula:~~

The concentration limits effective on and after July 1, 2012 shall become effective provided the Executive Officer conducts a technology assessment that confirms that the limits are achievable, and reports to the Governing Board by July 2010, at a regularly scheduled public meeting.

The concentration limits effective on and after July 1, 2012 shall not apply to engines that operate less than 500 hours per year or use less than 1 x 10<sup>9</sup> Btus per year (higher heating value) of fuel.

<u>TABLE III</u>		
<u>CONCENTRATION LIMITS FOR LANDFILL AND DIGESTOR GAS-FIRED ENGINES</u>		
<u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u>	<u>VOC (ppmvd)<sup>2</sup></u>	<u>CO (ppmvd)<sup>1</sup></u>
<u>bhp &gt; 500: 36 x ECF<sup>3</sup></u>	<u>Landfill Gas: 40</u>	<u>2000</u>
<u>bhp &lt; 500: 45 x ECF<sup>3</sup></u>	<u>Digester Gas: 250 x ECF<sup>3</sup></u>	

<u>CONCENTRATION LIMITS</u>		
<u>EFFECTIVE JULY 1, 2012</u>		
<u>NO<sub>x</sub> (ppmvd)<sup>1</sup></u>	<u>VOC (ppmvd)<sup>2</sup></u>	<u>CO (ppmvd)<sup>1</sup></u>
<u>11</u>	<u>30</u>	<u>250</u>

<sup>1</sup> Parts per million by volume, corrected to 15% oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Parts per million by volume, measured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method.

<sup>3</sup> ECF is the efficiency correction factor.

The ECF shall be 1.0 unless:

- (i) The engine operator has measured the engine's net specific energy consumption (q<sub>a</sub>), in compliance with ASME Performance Test Code PTC 17 -1973, at the average load of the engine; and
- (ii) The ECF-corrected emission limit is made a condition of the engine's permit to operate.

The ECF is as follows:

$$\text{ECF} = \frac{9250 \text{ Btus/hp-hr}}{\text{Measured } q_a \text{ in Btus/hp-hr}}$$

Measured q<sub>a</sub> shall be based on the lower heating value of the fuel. ECF shall not be less than 1.0.

The Executive officer may approve the burning of more than 10% natural gas in a landfill or digester gas-fired engine, when it is necessary, if: the only alternative to limiting natural gas to 10% would be shutting down the engine and flaring more landfill or digester gas; or the engine requires more natural gas in order for a waste heat recovery boiler to provide enough thermal energy to operate a sewage treatment plant, and other boilers at the facility are unable to provide the necessary thermal energy.

Once an engine complies with concentration limits effective on and after July 1, 2012, there shall be no limit on the percentage of natural gas burned.

CONCENTRATION LIMIT FORMULA			
Concentration Limit	=	Reference Limit	× $\frac{EFF}{25\%}$

Where:

Concentration Limit = the allowable NO<sub>x</sub> or VOC emission limit (ppm by volume) corrected to 15 percent oxygen on a dry basis, and averaged over 15 consecutive minutes.

Reference Limit = the NO<sub>x</sub> or VOC emission limit (ppm by volume) corrected to 15 percent oxygen on a dry basis. The reference limits for various bhp ratings (continuous rating by the manufacturer) are listed in TABLE IV.

TABLE III STATIONARY ENGINES DESCRIPTION
For electric power generation
Fired by landfill gas
Fired by sewage digester gas
Used to drive a water supply or conveyance pump except for aeration facilities
Fired by oil field produced gas
For integral engine-compressor applications operating less than 4000 hours per calendar year
Fired by liquefied petroleum gas (LPG)

TABLE IV REFERENCE LIMITS, ppm		
Bhp Rating	NO <sub>x</sub>	VOC

500 and greater	36	250
Greater Than 50 and Less Than 500	45	250

And,

~~EFF = the demonstrated percent efficiency at full load when averaged over 15 consecutive minutes of the engine only without consideration of any downstream energy recovery from the actual heat rate, in Btu/kW hr, corrected to the HHV (higher heating value) of the fuel; or the manufacturer's continuous rated percent efficiency (manufacturer's rated efficiency) of the engine after correction from LHV (lower heating value) to the HHV of the fuel, whichever efficiency is higher. The value of EFF shall not be less than 25 percent. Engines with lower efficiencies will be assigned a 25 percent efficiency for this calculation.~~

$$EFF = \frac{3413 \times 100\%}{\text{Actual Heat Rate at HHV of Fuel (Btu/kW hr)}}$$

or

$$EFF = (\text{Manufacturer's Rated Efficiency at LHV}) \times \frac{LHV}{HHV}$$

- (D) The operator of any new engine subject to subparagraph (e)(12)(B) shall:
  - (i) Comply with the requirements of Best Available Control Technology in accordance with Regulation XIII if the engine requires a District permit; or
  - (ii) Not operate the engine in a manner that exceeds the emission concentration limits in ~~Table~~ABLE I if the engine does not require a District permit.
- (E) By (one year from date of rule adoption), the operator of a spark-ignited engine without a Rule 218-approved continuous emission monitoring system (CEMS) or a Regulation XX (RECLAIM)-approved CEMS shall equip and maintain the engine with an air-

to-fuel ratio controller with an oxygen sensor and feedback control, or other equivalent technology approved by the Executive Officer, CARB and EPA.

(F) New Non-Emergency Electrical Generators

(i) All new non-emergency engines driving electrical-generators shall comply with the following emission standards, based on the emission standards of the Distributed Generation Certification Program, Article 3, Subchapter 8, Chapter 1, Division 30, Title 17 of the California Code of Regulations, that became effective on January 1, 2007:

<u>TABLE IV</u>	
<u>EMISSION STANDARDS FOR NEW ELECTRICAL GENERATION ENGINES</u>	
<u>Pollutant</u>	<u>Emission Standard (lbs/MW-hr)<sup>1</sup></u>
<u>NO<sub>x</sub></u>	<u>0.070</u>
<u>CO</u>	<u>0.240</u>
<u>VOC</u>	<u>0.100<sup>2</sup></u>

1. The averaging time of the emission standards is 15 minutes for NO<sub>x</sub> and CO and the sampling time required by the test method for VOC, except as described in the following clause.

2. Mass emissions of VOC shall be calculated using a ratio of 16.04 pounds of VOC per lb-mole of carbon.

(ii) Engines subject to this subparagraph that produce combined heat and electrical power may include one megawatt-hour (MW-hr)-for each 3.4 million Btus of useful heat recovered (MW<sub>th</sub>-hr), in addition to each MW-hr of net electricity produced (MW<sub>e</sub>-hr). The compliance of such engines shall be based on the following equation:

$$\frac{\text{Lbs}}{\text{MW-hr}} = \frac{\text{Lbsx Electrical Energy Factor (EEF)}}{\text{MW}_e\text{-hr}}$$

Where:

$\frac{\text{Lbs}}{\text{MW-hr}}$  = The calculated emissions that shall comply with the emission standards in Table IV

$\frac{\text{Lbs}}{\text{MW}_e\text{-hr}}$  = The short-term engine emission limit in pounds per  $\text{MW}_e\text{-hr}$  of net electrical energy produced, averaged over 15 minutes. The engine shall comply with this limit at all times.

EEF = The annual  $\text{MW}_e\text{-hrs}$  of net electrical energy produced divided by the sum of annual  $\text{MW}_e\text{-hrs}$  plus annual  $\text{MW}_{th}\text{-hrs}$  of useful heat recovered. The engine operator shall demonstrate annually that the EEF is less than the value required for compliance.

- (iii) For combined heat and power engines, the short-term emission limits in lbs/ $\text{MW}_e\text{-hr}$  and the maximum allowed annual EEF must be selected by operator and stated on the operating permit.
- (iv) Notwithstanding Rule 2001, the requirements of this subparagraph shall apply to NOx emissions from new non-emergency engines driving electrical-generators subject to Regulation XX (RECLAIM).
- (v) This subparagraph does not apply to: engines installed prior to (date of adoption); engines issued a permit to construct prior to (date of adoption) and installed within 12 months of the date of the permit to construct; engines for which an application is deemed complete by October 1, 2007; engines installed by an electric utility on Santa Catalina Island; engines installed at remote locations without access to natural gas and electric power; engines used to supply electrical power to ocean-going vessels while at berth, prior



to January 1, 2014; or landfill or digester gas-fired engines that meet the requirements of subparagraph (d)(1)(C).

(2) Portable Engines:

(A) ~~The operator of any portable engine subject to this rule shall:~~

- ~~(i) By December 31, 1999, not operate the engine in a manner that exceeds the emission concentration limits of TABLE V for spark ignition engines, or the emission requirements of TABLE VI for compression ignition engines;~~
- ~~(ii) By January 1, 2010, meet the most stringent emissions standard which is the applicable emissions standard in effect and set forth in Title 13 of the CCR for that engine rating. If no emissions standard exists under the CCR, then the applicable emissions standard set forth in 40 CFR Part 89 shall apply. If no standard exists under the CCR and 40 CFR Part 89, then the applicable requirements of TABLE V for spark ignition engines or TABLE VI for compression ignition engines shall apply; and~~
- ~~(iii) Submit to the Executive Officer a letter certifying that the engine is in compliance with the provisions of the subparagraph, in accordance with the compliance schedule in paragraph (e)(2).~~

<b>TABLE V</b>		
<b>PORTABLE SPARK IGNITION ENGINE</b>		
<b>CONCENTRATION LIMITS</b>		
NO <sub>x</sub>	VOC	CO
80 ppm <sup>3</sup> (1.5 g/bhp-hr)	240 ppm <sup>3</sup> (1.5 g/bhp-hr)	176 ppm <sup>3</sup> (2.0 g/bhp-hr)

<sup>3</sup> ~~Corrected to 15% oxygen on a dry basis and averaged over 15 minutes.~~

<b>TABLE VI</b>	
<b>PORTABLE COMPRESSION IGNITION ENGINE</b>	
<b>EMISSION REQUIREMENTS</b>	
Rated Brake Horsepower	Requirements

Greater Than 50 And Less Than 117	770 ppm <sup>4</sup> NO <sub>x</sub> (10.0 g/bhp-hr), or turbocharger and 4-degree injection timing retard
Greater Than or Equal To 117 And Less Than 400	550 ppm <sup>4</sup> NO <sub>x</sub> (7.2 g/bhp-hr), or turbocharger and aftercooler/intercooler and 4-degree injection timing retard
Greater Than or Equal To 400	535 ppm <sup>4</sup> NO <sub>x</sub> (7.0 g/bhp-hr), or turbocharger and aftercooler/intercooler and 4-degree injection timing retard
<sup>4</sup> Corrected to 15% oxygen on a dry basis and averaged over 15 minutes.	

(~~A~~B) The operator of any portable engine generator subject to this rule shall not use the portable generator for:

- (i) Power production into the electric grid, except to maintain grid stability during an emergency event or other unforeseen event that affects grid stability; or
- (ii) Primary or supplemental power to a building, facility, stationary source, or stationary equipment, except during unforeseen interruptions of electrical power from the serving utility, maintenance and repair operations, and remote operations where grid power is unavailable. For interruptions of electrical power, the operation of a portable generator shall not exceed the time of the actual interruption of power.

This subparagraph shall not apply to a portable generator that complies with emission concentration limits of Table I and the other requirements in this rule applicable to stationary engines.

~~(B)~~ The operator of any portable diesel engine shall comply with the applicable requirements of the Subchapter 7.5 Airborne Toxic Control Measures for diesel particulate matter in Chapter 1, Division 3, Title 17 of the California Code of Regulations.

~~(C)~~ The operator of any portable spark-ignited engine shall comply with the applicable requirements of the Large Spark Ignition Engine Fleet Requirements, Article 2, Chapter 15, Division 3, Title 13 of the California Code of Regulations.

## (e) Compliance

~~(1) — Portable Engines:~~

~~The owner/operator of portable engines subject to the provisions of subparagraph (d)(2) shall:~~

~~(A) — For engines for which engine modification or add-on control is used to comply with the applicable requirements of TABLE V for spark ignition engines, or TABLE VI for compression ignition engines:~~

~~(i) — By April 30, 1998, submit applications for permit to construct and permit to operate engines;~~

~~(ii) — By September 30, 1999, initiate engine modification or control equipment installation; and~~

~~(iii) — By December 31, 1999, have engines in compliance with the applicable requirements of TABLE V for spark ignition engines, or TABLE VI for compression ignition engines.~~

~~(B) — For engines for which engine modification or add-on control is used to comply with the most stringent emissions standard as set forth in clause (d)(2)(A)(ii):~~

~~(i) — By April 30, 2008, submit applications for permit to construct and permit to operate engines;~~

~~(ii) — By September 30, 2009, initiate engine modification or control equipment installation; and~~

~~(iii) — By December 31, 2009, have engines in compliance with the most stringent emissions standard.~~

~~(C) — By December 31, 2009, if the engines are in compliance with the most stringent emissions standard, submit to the Executive Officer a letter certifying that the engines are in compliance with the emissions standard.~~

~~(12) Agricultural Stationary Engines:~~

~~(A) The operator of any agricultural stationary engine subject to this rule and installed or issued a permit to construct prior to June 3, 2005 shall comply with paragraph (d)(1)(B) and the other applicable provisions of this rule in accordance with the compliance schedules in Table VI:~~

<b>TABLE VI COMPLIANCE SCHEDULES FOR STATIONARY AGRICULTURAL ENGINES</b>		
<b>Action Required</b>	<b>Tier 2 and Tier 3 Diesel Engines, Certified Spark-Ignition Engines, and All Engines at Facilities with Actual Emissions Less Than the Amounts in the Table of Rule 219(g)</b>	<b>Other Engines</b>
Submit notification of applicability to the Executive Officer	January 1, 2006	January 1, 2006
Submit to the Executive Officer applications for permits to construct engine modifications, control equipment, or replacement engines	March 1, 2009	September 1, 2007
Initiate construction of engine modifications, control equipment, or replacement engines	September 30, 2009, or 30 days after the permit to construct is issued, whichever is later	March 30, 2008, or 30 days after the permit to construct is issued, whichever is later
Complete construction and comply with applicable requirements	January 1, 2010, or 60 days after the permit to construct is issued, whichever is later	July 1, 2008, or 60 days after the permit to construct is issued, whichever is later
Complete initial source testing	March 1, 2010, or 120 days after the permit to construct is issued, whichever is later	September 1, 2008, or 120 days after the permit to construct is issued, whichever is later

The notification of applicability shall include the following for each engine:

- (i) Name and mailing address of the operator.
- (ii) Address of the engine location.
- (iii) Manufacturer, model, serial number, and date of manufacture of the engine.
- (iv) Application number

- (v) Engine type (diesel, rich-burn spark-ignition or lean-burn spark-ignition)
- (vi) Engine fuel type
- (vii) Engine use (pump, compressor, generator, or other)
- (viii) Expected means of compliance (engine replacement, control equipment installation, or electrification)

(B) The operator of any new agricultural stationary engine that is not subject to the compliance schedule of subparagraph (e)(12)(A) for existing engines shall comply with the requirements of subparagraph (d)(1)(D) immediately upon installation.

~~(3) Agricultural Portable Engines:~~

~~(A) The operator of any agricultural portable engine subject to this rule shall comply with paragraph (f)(2) by January 1, 2006.~~

(2) Non-Agricultural Stationary Engines:

(A) The operator of any stationary engine not meeting the requirements of subparagraphs (d)(1)(B) or (d)(1)(C) that go into effect in 2010 or later, shall comply with the compliance schedule in Table VI:

<b><u>TABLE VI</u></b> <b><u>COMPLIANCE SCHEDULE FOR NON</u></b> <b><u>-AGRICULTURAL STATIONARY ENGINES</u></b>	
<b><u>Action Required</u></b>	<b><u>Applicable Compliance Date</u></b>
<u>Submit to the Executive Officer applications for permits to construct engine modifications, control equipment, or replacement engines</u>	<u>Twelve months before the final compliance date</u>
<u>Initiate construction of engine modifications, control equipment, or replacement engines</u>	<u>Three months before the final compliance date, or 60 days after the permit to construct is issued, whichever is later</u>
<u>Complete construction and comply with applicable requirements</u>	<u>The final compliance date, or 120 days after the permit to construct is issued, whichever is later</u>

<u>Complete initial source testing</u>	<u>60 days after the final compliance date in (d)(1)(B) or (d)(1)(C), or 180 days after the permit to construct is issued, whichever is later</u>
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(B) The operator of any stationary engine that elects to amend a permit to operate to incorporate ECF-adjusted emission limits shall submit to the Executive Officer an application for a change of permit conditions by (six months from date of adoption), and comply with emission limits of the previous version of this rule until (one year from date of adoption) when the engine shall be in compliance with the emission limits of this rule.

(C) The operator of any stationary engine that is required to add operating restrictions to a permit to operate to meet the requirements of paragraph (h)(2), shall submit to the Executive Officer an application for a change of permit conditions by (six months from date of adoption).

(3) Stationary Engine CEMS

(A) The operator of any stationary engine with an existing CEMS shall commence the reporting required by Rule 218 Subdivision (f) on January 1, 2008. The first summary report for the six months ending June 30, 2008 shall be due on July 30, 2008.

(B) The operator of any stationary engine that is required to modify an existing CEMS or install a CEMS on an existing engine, shall comply with the compliance schedule in Table VII. Public agencies shall be allowed one year more than the dates in Table VII, except for biogas engines.

<b><u>TABLE VII</u></b> <b><u>COMPLIANCE SCHEDULE NEW OR MODIFIED CEMS</u></b> <b><u>ON EXISTING ENGINES</u></b>			
<u>Action Required</u>	<u>Applicable Compliance Dates For:</u>		
	<u>Non-Biogas Engines Rated at 750 bhp or More</u>	<u>Non-Biogas Engines Rated at Less than 750 bhp</u>	<u>Biogas Engines*</u>

<u>Submit to the Executive Officer applications for new or modified CEMS</u>	<u>(six months from date of adoption)</u>	<u>(18 months from date of adoption)</u>	<u>January 1, 2011</u>
<u>Complete installation and commence CEMS operation, calibration, and reporting requirements.</u>	<u>Within 180 days of initial approval</u>	<u>Within 180 days of initial approval</u>	<u>Within 180 days of initial approval</u>
<u>Complete certification tests</u>	<u>Within 90 days of installation</u>	<u>Within 90 days of installation</u>	<u>Within 90 days of installation</u>
<u>Submit certification reports to Executive Officer</u>	<u>Within 45 days after tests are completed</u>	<u>Within 45 days after tests are completed</u>	<u>Within 45 days after tests are completed</u>
<u>Obtain final approval of CEMS</u>	<u>Within 1 year of initial approval</u>	<u>Within 1 year of initial approval</u>	<u>Within 1 year of initial approval</u>

\* A biogas engine is one that is subject to the emission limits of Table III.

(4) Stationary Engine Inspection and Monitoring (I&M) Plans:

The operator of stationary engines subject to the I&M plan provisions of subparagraph (f)(1)(D) shall:

(A) By (six months from date of adoption), submit an initial I&M plan application to the Executive Officer for approval;

(B) By (ten months from date of adoption), implement an approved I&M plan or the I&M plan as submitted if the plan is not yet approved.

Any operator of 15 or more stationary engines subject to the I&M plan provisions shall comply with the above schedule for at least 50% of engines, and for the remaining engines shall may, for up to 50 percent of the engines:

(C) By (12 months from date of adoption), submit an initial I&M plan application to the Executive Officer for approval;

(D) By (16 months from date of adoption), implement an approved I&M plan or the I&M plan as submitted if the plan is not yet approved.

(5) Stationary Engine Air-to-Fuel Ratio Controllers

(A) The operator of any stationary engine that does not have an air-to-fuel ratio controller, as required by subparagraph (d)(1)(E), shall comply with those requirements in accordance with the compliance



schedule in Table VI, except that the application due date is no later than (three months from date of adoption) and the initial source testing may be conducted at the time of the bi-annual-testing required by subparagraph (f)(1)(C).

~~(A)~~(B) The operator of any stationary engine that has the air-to-fuel ratio controller required by subparagraph (d)(1)(E), but it is not listed on the permit to operate, shall submit to the Executive Officer an application to amend the permit by (three months from date of adoption).

(C) The operator of more than five engines that do not have air-to-fuel ratio controllers may take an additional three months, to (15 months from rule adoption), to install the equipment on up to 50% of the affected engines.

(6) New Stationary Engines

The operator of any new stationary engine issued a permit to construct after (date of adoption) shall comply with the applicable I&M or CEMS requirements of this rule when operation commences. If applicable, the operator shall provide the required information in subparagraph (f)(1)(D) to the Executive Officer prior to the issuance of the permit to construct so that the I&M procedures can be included in the permit. A separate I&M plan application is not required.

(7) Biogas Engines

For any biogas engine for which the operator applies to the Executive Officer by (two months from date of adoption) for a change of permit conditions for ECF-corrected emission limits, or the approval to burn more than 10 percent natural gas in accordance with subparagraph (d)(1)(C), the biogas engine shall not be subject to the initial concentration limits of Tables II or III until six months from (date of adoption), provided the operator continues to comply with all emission limits in effect prior to (date of adoption).

~~(7)~~(8) Compliance Schedule Exception

If an engine operator submits to the Executive Officer an application for an administrative change of permit conditions to add a permit condition that causes the engine permit to expire by the effective date of any requirement of this rule, then the operator is not required to comply with the earlier steps required by this subdivision for that requirement. The

effective date for the CEMS requirements shall be one year after the date that a CEMS application is due.

(f) Monitoring, Testing, and Recordkeeping and Reporting

(1) Stationary engines:

The operator of any engine subject to the provisions of paragraph (d)(1) of this rule shall meet the following requirements:

(A) Continuous Emission Monitoring

(i) For engines of 1000 bhp and greater, and operating more than two million bhp-hr per calendar year, ~~install, operate and maintain in calibration a NO<sub>x</sub> and CO continuous emission monitoring system (CEMS) shall be installed, operated and maintained in calibration to demonstrate compliance with the emission limits of this rule.—CEMS shall meet the requirements described in 40 CFR Part 60, particularly those in Appendix B, Spec. 2 and Appendix F, as well as the reporting requirements of 40 CFR Part 60 Sections 60.7(c), 60.7(d), and 60.13, and shall include equipment that measures and records NO<sub>x</sub> exhaust gas concentrations, corrected to 15 percent oxygen on a dry basis.~~

(ii) (I) For facilities with engines subject to paragraph (d)(1), having a combined rating of 1500 bhp or greater at the same location, and having a combined fuel usage of more than 16 x 10<sup>9</sup> Btus per year (higher heating value), CEMS shall be installed, operated and maintained in calibration to demonstrate compliance of those engines with the applicable NO<sub>x</sub> and CO emission limits of this rule.

(II) Any engine that as of October 1, 2007 is located within 75 feet of another engine (measured from engine block to engine block) is considered to be at the same location. Operators of new engines shall not install engines farther than 75 feet from another engine unless the operator demonstrates to the

Executive Officer that operational needs or space limitations require it.

- (III) The following engines shall not be counted toward the combined rating or required to have a CEMS by this clause: engines rated at less than 500 bhp; standby engines that are limited by permit conditions to only operate when other primary engines are not operable; engines that are limited by permit conditions to operate less than 1000 hours per year or a fuel usage of less than  $8 \times 10^9$  Btus per year (higher heating value of all fuels used); and engines required to have a CEMS by the previous clause. A CEMS shall not be required if permit conditions limit the simultaneous use of the engines at the same location in a manner to limit the combined rating of all engines in simultaneous operation to less than 1500 bhp.
- (IV) For engines rated below 1000 bhp, the CEMS may be time shared by multiple engines.
- (iii) All CEMS required by this rule shall:
  - (I) Comply with the applicable requirements of Rules 218 and 218.1, including equipment specifications and certification, operating, recordkeeping, quality assurance and reporting requirements, except as otherwise authorized by this rule;
  - (II) Include equipment that measures and records exhaust gas concentrations, both uncorrected and corrected to 15 percent oxygen on a dry basis; and
  - (III) Have data gathering and retrieval capability approved by the Executive Officer
- (iv) The operator of an engine that is required to install CEMS may request the Executive Officer to approve an alternative monitoring device (or system components) to demonstrate compliance with the emission limits of this rule. The

applicant shall demonstrate to the Executive Officer that the proposed alternative monitoring device is at a minimum equivalent in relative accuracy, precision, reliability, and timeliness to a CEMS for that engine, according to the criteria specified in 40 CFR Part 75 Subpart E. In lieu of the criteria specified in 40 CFR Part 75 Subpart E, substitute criteria is acceptable if the applicant demonstrates to the Executive Officer that the proposed alternative monitoring device is at minimum equivalent in relative accuracy precision, reliability, and timeliness to a CEMS for that engine. Upon approval by the Executive Officer, the substitute criteria shall be submitted to ~~the federal Environmental Protection Agency (EPA)~~ as an amendment to the State Implementation Plan (SIP).

If the alternative monitoring device is denied or fails to be recertified, a CEMS shall be required.

~~(iii) The monitoring system shall have data gathering and retrieval capability approved by the Executive Officer.~~

(v) Notwithstanding the requirements of Rules 218 and 218.1, operators of engines that are required to install a CEMS by clause (ii) of this subparagraph may:

(I) Store data electronically without a strip chart recorder, but there shall be redundant data storage capability for at least 15 days of data. The operator must demonstrate that both sets of data are equivalent.

(II) Conduct relative accuracy testing on the same schedule for source testing in clause (f)(1)(C)(i), instead of annually. The minimum sampling time for each test is 15 minutes.

(vi) Notwithstanding the requirements of Rules 218 and 218.1, operators of engines that are required to install a CEMS by clause (ii) of this subparagraph, and that are to be monitored by a timeshared CEMS, may:

- (I) Monitor an engine with the CEMS for 15 consecutive minutes, purge for the minimum required purge time, then monitor the next engine for 15 consecutive minutes. The CEMS shall operate continuously in this manner, except for required calibrations.
- (II) Record the corrected and uncorrected NO<sub>x</sub>, CO and diluent data at least once per minute and calculate and record the 15-minute average corrected concentrations for each sampling period.
- (III) Have sample lines to each engine that are not the same length. The purge time will be based on the sample line with the longest response time. Response times shall be checked during cylinder gas audits. Sample lines shall not exceed 100 feet in length.
- (IV) Conduct a minimum of five tests for each engine during relative accuracy tests.
- (V) Perform cylinder gas audit every calendar quarter on each engine, except for engines for which relative accuracy testing was conducted that quarter.
- (VI) Exclude monitoring of nitrogen dioxide (NO<sub>2</sub>) for rich-burn engines, unless source testing demonstrates that NO<sub>2</sub> is more than 10 percent of total NO<sub>x</sub>.
- (VII) Conduct daily calibration error (CE) tests by injecting calibration gases at the analyzers, except that at least once per week the CE test shall be conducted by injecting calibration gases as close to the probe tip as practical.
- (VIII) Stop operating and calibrating the CEMs during any period that the operator has a continuous record that the engine was not in operation.
- (vii) A CO CEMS shall not be required for lean-burn engines or an engine that is subject to Regulation XX (RECLAIM), and not required to have a NO<sub>x</sub> CEMS by that regulation.

(viii) Notwithstanding the requirements of this paragraph and paragraph (c)(2) of Rule 2012, an operator may take an existing NOx CEMS out of service for up to two weeks (cumulative) in order to modify the CEMS to add CO monitoring.

(B) Elapsed Time Meter

~~Maintain~~The engine shall have an operational non-resettable totalizing time meter to determine the engine elapsed operating time.

(C) Source Testing

(i) ~~Conduct~~ Provide source testing information regarding the ~~exhaust gas, specifically for~~ NO<sub>x</sub>, VOC reported as carbon, and CO concentrations (concentrations in ppm by volume, corrected to 15 percent oxygen on dry basis) at least once every ~~two~~<sup>3</sup> years, or every 8,760 operating hours, ~~whichever occurs first~~. Relative accuracy tests required by Rule 218.1 or 40 CFR Part 75 Subpart E will satisfy this requirement for those pollutants monitored by a CEMS. The source test frequency may be reduced to once every three years if the engine has operated less than 2,000 hours since the last source test. If the engine has not been operated within three months of the date a source test is required, the source test shall be conducted when the engine resumes operation for a period longer than either seven consecutive days or 15 cumulative days of operation. The operator of the engine shall keep sufficient operating records to demonstrate that it meets the requirements for extension of the source testing deadlines.

(ii) ~~Conduct source testing for at least 30 minutes during normal operation (actual duty cycle). This test shall not be conducted under a steady-state condition unless it is the normal operation. In addition, conduct source testing for NOx and CO emissions for at least 15 minutes at: an engine's actual peak load, or the maximum load that can be practically achieved during the test, and; at actual minimum load, excluding idle, or the minimum load that can be~~

practically achieved during the test. These additional two tests are not required if the permit limits the engine to operating at one defined load,  $\pm$  10%. No pre-tests for compliance are permitted. The emission test shall be conducted at least 40 operating hours, or at least 1 week, after any engine servicing or tuning. If an emission exceedance is found during any of the three phases of the test, that phase shall be completed and reported. The operator shall correct the exceedance, and the source test may be immediately resumed.

- (iii) Use a contractor to conduct the source testing that is approved by the Executive Officer under the Laboratory Approval Program for the necessary test methods.
- (iv) Submit a source test protocol to the Executive Officer for written approval at least 60 days before the scheduled date of the test. The source test protocol shall include the name, address and phone number of the engine operator and a District-approved source testing contractor that will conduct the test, the application and permit number(s), emission limits, a description of the engine(s) to be tested, the test methods and procedures to be used, the number of tests to be conducted and under what loads, the required minimum sampling time for the VOC test, based on the analytical detection limit and expected VOC levels, and a description of the parameters to be measured in accordance with the I&M plan required by subparagraph (f)(1)(D). The source test protocol shall be approved by the Executive Officer prior to any testing. The operator is not required to submit a protocol for approval if: there is a previously approved protocol that meets these requirements; the engine has not been altered in a manner that requires a permit alteration; and emission limits have not changed since the previous test. If the operator submits the protocol by the required date, and the Executive Officer takes longer than 60 days to approve the protocol, the operator shall be allowed the additional time needed to conduct the test.

(v) Provide the Executive Officer at least 30 days prior notice of any source test to afford the Executive Officer the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the engine operator shall notify the Executive Officer as soon as possible of any delay in the original test date, either by providing at least seven days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Executive Officer by mutual agreement.

(vi) Submit all source test reports, including a description of the equipment tested, to the Executive Officer within 60 days of completion of the test.

(vii) By (one year from date of adoption), provide, or cause to be provided, source testing facilities as follows:

(I) Sampling ports adequate for the applicable test methods. This includes constructing the air pollution control system and stack or duct such that pollutant concentrations can be accurately determined by applicable test methods;

(II) Safe sampling platform(s), scaffolding or mechanical lifts, including safe access, that comply with California General Safety Orders. Agricultural stationary engines are excused from this subclause if they are in remote locations without electrical power;

(III) Utilities for sampling and testing equipment. Agricultural stationary engines are exempt from this subclause if they are on wheels and moved to storage during the off season.

(D) Inspection and Monitoring (I&M) Plan

Submit to the Executive Officer for written approval and implement an I&M plan. One plan application is required for each facility. The I&M plan shall include:



- (i) Identification of engine and control equipment operating parameters necessary to maintain pollutant concentrations within the rule and permit limits. This shall include, but not be limited to:
- (I) Procedures for using a portable NO<sub>x</sub>, CO and oxygen analyzer to establish the set points of the air-to-fuel ratio controller (AFRC) at 25%, 60% and 95% load (or fuel flow rate), ± 5%, or the minimum, midpoint and maximum loads that actually occur during normal operation, ± 5%, or at any one load within the ± 10% range that an engine permit is limited to in accordance with clause (f)(1)(C)(ii);
- (II) Procedures for verifying that the AFRC is controlling the engine to the set point during the daily monitoring required by clause (f)(1)(DE)(iv);
- (III) Procedures for reestablishing all AFRC set points with a portable NO<sub>x</sub>, CO and oxygen analyzer whenever a set point must be readjusted, within 24 hours of an oxygen sensor replacement, and, for rich-burn engines with three way catalysts, between 100 and 150 engine operating hours after an oxygen sensor replacement;
- (IV) For engines with catalysts, the maximum allowed exhaust temperature at the catalyst inlet, based on catalyst manufacturer specifications;
- (V) For lean-burn engines with selective catalytic control devices, the minimum exhaust temperature at the catalyst inlet required for reactant flow (ammonia or urea), and procedures for using a portable NO<sub>x</sub> and oxygen analyzer to establish the acceptable range of reactant flow rate, as a function of load;.

Parameter monitoring is not required for diesel engines without exhaust gas recirculation and catalytic exhaust control devices.

- (ii) Procedures for alerting the operator to emission control malfunctions. Engine control systems, such as air-to-fuel ratio controllers, shall have a malfunction indicator light and audible alarm.
- (iii) Procedures for at least weekly or every 150 engine operating hours, whichever occurs later, emissions checks by a portable NO<sub>x</sub>, CO and oxygen analyzer.
  - (I) If an engine is in compliance for three consecutive emission checks, without any adjustments to the oxygen sensor set points, then the engine may be checked monthly or every 750 engine operating hours, whichever occurs later, until there is a noncompliant emission check or, for rich-burn engines with three-way catalysts, the oxygen sensor is replaced.
  - ~~(II)~~ For diesel engines and other lean-burn engines that are subject to Regulation XX or have a NO<sub>x</sub> CEMs, and that are subject to a CO limit more stringent than the 2000 ppmvd limit of Tables II or III, a CO emission check shall be performed at least quarterly, or every 2,000 engine operating hours, whichever occurs later.
  - ~~(III)~~ For diesel engines and other lean-burn engines that are subject to Regulation XX or have a NO<sub>x</sub> CEMs, and that are not subject to a CO limit more stringent than the 2000 ppmvd limit of Tables II or III, emission checks are not required.
  - (IV) No engine or control system maintenance or tuning may be conducted within 72 hours prior to the emission check, unless it is an unscheduled, required repair.
  - (V) The portable analyzer shall be calibrated, maintained and operated in accordance with the manufacturer's specifications and recommendations and the Protocol for the Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen

from Stationary Engines Subject to South Coast Air Quality Management District Rule 1110.2, approved on (date of adoption), or subsequent protocol approved by EPA and the Executive Officer.

(iv) Procedures for at least daily monitoring, inspection and recordkeeping of:

- (I) engine load or fuel flow rate,
- (II) the set points, maximums and acceptable ranges of the parameters identified by clause (f)(1)(D)(i), and the actual values of the same parameters;
- (III) the engine elapsed time meter operating hours;
- (IV) the operating hours since the last emission check required by (f)(1)(D)(iii)
- (V) for rich-burn engines with three-way catalysts, the difference of the exhaust temperatures ( $\Delta T$ ) at the inlet and outlet of the catalyst (changes in the  $\Delta T$  can indicate changes in the effectiveness of the catalyst);
- (VI) engine control system and AFRC system faults or alarms that affect emissions;

The daily monitoring and recordkeeping may be done in person by the operator, or by remote monitoring.

(v) Procedures for responding to, diagnosing and correcting breakdowns, faults, malfunctions, alarms, emission checks finding emissions in excess of rule or permit limits, and parameters out-of-range.

- (I) For a breakdown resulting in a violation of this rule or a permit condition, or for an emission check that finds emissions in excess of those allowed by this rule or a permit condition, the operator shall correct the problem and demonstrate compliance with another emission check, or shut down an engine by the end of an operating cycle, or within 24 hours from the time the operator knew of the breakdown

or excess emissions, or reasonably should have known, whichever is sooner.

(II) For other problems, such as parameters out-of-range, an operator shall correct the problem and demonstrate compliance with another emission check within 48 hours of the operator first knowing of the problem.

(III) An operator shall not be considered in violation of the emission limits of this rule or in permit conditions if the operator complies with this subparagraph and the reporting requirements of subparagraph (f)(1)(H). Any emission check conducted by District staff that finds excess emissions is a violation.

(vi) Procedures and schedules for preventive and corrective maintenance;

(vii) Procedures for reporting noncompliance to the Executive Officer in accordance with subparagraph (f)(1)(H).

(viii) Procedures and format for the recordkeeping of monitoring and other actions required by the plan;

(ix) Procedures for plan revisions. Before any change in I&M plan operations can be implemented, the revised I&M plan shall be submitted to and approved by the Executive Officer. The operator shall apply for a plan revision prior to any change in emission limits or control equipment.

(x) An engine is not subject to this subparagraph if it is required by this rule to have a NOx and CO CEMS, or voluntarily has a NOx and CO CEMS that complies with this rule.

~~(E)~~ Operating Log

Maintain a monthly engine operating log that includes:

- (i) Total hours of operation;
- (ii) Type of liquid and/or type of gaseous fuel;
- (iii) Fuel consumption (cubic feet of gas ~~and~~ gallons of liquid); and

- (iv) Cumulative hours of operation since the last source test required in subparagraph (f)(1)(C).

Facilities subject to Regulation XX may maintain a quarterly log for engines that are designated as a process unit on the facility permit.

(F) New Non-Emergency Electrical Generating Engines

Operators of engines subject to the requirements of subparagraph (d)(1)(F) shall also meet the following requirements.

- (i) The engine generator shall be monitored with a calibrated electric meter that measures the net electrical output of the engine generator system, which is the difference between the electrical output of the generator and the electricity consumed by the auxiliary equipment necessary to operate the engine generator.
- (ii) For engines monitored with a CEMS, the emissions of the monitored pollutants in ppmvd corrected to 15% O<sub>2</sub>, , lbs/hr, and lbs/MW<sub>e</sub>-hr and the net MW<sub>e</sub>-hrs produced shall be calculated and recorded for the four 15-minute periods of each hour of operation. The mass emissions of NO<sub>x</sub> shall be calculated based on the measured fuel flow and one of the F factor methods of 40 CFR 60, Appendix A, Method 19, or other method approved by the Executive Officer. Mass emissions of CO shall be calculated in the same manner as NO<sub>x</sub>, except that the ppmvd CO shall be converted to lb/scf using a conversion factor of  $0.727 \times 10^{-7}$ .
- (iii) For NO<sub>x</sub> and CO emissions from engines not monitored with a CEMS and VOC emissions from all engines, the emissions of NO<sub>x</sub>, CO and VOC in lbs/MW<sub>e</sub>-hr shall be calculated and recorded whenever the pollutant is measured by a source test or emission check. Mass emissions of NO<sub>x</sub> and CO shall be calculated in the same manner as the previous clause. Mass emissions of VOC shall be calculated in the same manner, except that the ppmvd VOC as carbon shall be converted to lb/scf using a conversion factor of  $0.415 \times 10^{-7}$ .

- (iv) For engines generating combined heat and power that rely on the EEF to comply with Table IV emission standards, the daily and annual useful heat recovered ( $MW_{th}$ -hrs), net electrical energy generated ( $MW_e$ -hrs) and EEF shall be monitored and recorded.
- (v) Other methods of calculating mass emissions than those specified, such as by direct measurement of exhaust volume, may be used if approved by the Executive Officer. All monitoring, calculation, and recordkeeping procedures must be approved by the Executive Officer.
- (vi) Operators of combined heat and power engines shall submit to the Executive Officer the reports of the following information within 15 days of the end of the first year of operation, and thereafter within 15 days of the end of each calendar year: the annual net electrical energy generated ( $MW_e$ -hrs); the annual useful heat recovered ( $MW_{th}$ -hrs), the annual EEF calculated in accordance with clause (d)(1)(F)(ii); and the maximum annual EEF allowed by the operating permit. If the actual annual EEF exceeds the allowed EEF, the report shall also include the time periods and emissions for all instances where emissions exceeded any emission standard in Table IV.

(G) Portable Analyzer Operator Training

The portable analyzer tests required by the I&M Plan requirements of subparagraph (f)(1)(D) shall only be conducted by a person who has completed an appropriate District-approved training program in the operation of portable analyzers and has received a certification issued by the District.

(H) Reporting Requirements

- (i) The operator shall report to the Executive Officer, by telephone (1-800-CUT-SMOG or 1-800-288-7664) or other District-approved method, any breakdown resulting in emissions in excess of rule or permit emission limits within one hour of such noncompliance or within one hour of the time the operator knew or reasonably should have known of its occurrence. Such report shall identify the time, specific

location, equipment involved, responsible party to contact for further information, and to the extent known, the causes of the noncompliance, and the estimated time for repairs. In the case of emergencies that prevent a person from reporting all required information within the one-hour limit, the Executive Officer may extend the time for the reporting of required information provided the operator has notified the Executive Officer of the noncompliance within the one-hour limit.

(ii) Within seven calendar days after the reported breakdown has been corrected, but no later than thirty calendar days from the initial date of the breakdown, unless an extension has been approved in writing by the Executive Officer, the operator shall submit a written breakdown report to the Executive Officer which includes:

- (I) An identification of the equipment involved in causing, or suspected of having caused, or having been affected by the breakdown;
- (II) The duration of the breakdown;
- (III) The date of correction and information demonstrating that compliance is achieved;
- (IV) An identification of the types of excess emissions, if any, resulting from the breakdown;
- (V) A quantification of the excess emissions, if any, resulting from the breakdown and the basis used to quantify the emissions;
- (VI) Information substantiating whether the breakdown resulted from operator error, neglect or improper operation or maintenance procedures;
- (VII) Information substantiating that steps were immediately taken to correct the condition causing the breakdown, and to minimize the emissions, if any, resulting from the breakdown;
- (VIII) A description of the corrective measures undertaken and/or to be undertaken to avoid such a breakdown in the future; and

(IX) Pictures of any equipment which failed, if available.

(iii) Within 15 days of the end of each calendar quarter, the operator shall submit to the Executive Officer a report that lists each occurrence of a breakdown, fault, malfunction, alarm, engine or control system operating parameter out of the acceptable range established by an I&M plan or permit condition, or an emission check that finds excess emissions. Such report shall be in a District-approved format, and for each incident shall identify the time of the incident, the time the operator learned of the incident, specific location, equipment involved, responsible party to contact for further information, to the extent known the causes of the event, the time and description of corrective actions, including shutting an engine down, and the results of all portable analyzer NOx and CO emissions checks done before or after the corrective actions. The operator shall also report if no incidents occurred.

(2) Portable engines:

The operator of any portable engine shall maintain a monthly engine operating log that includes:

- (i) Total hours of operation; or
- (ii) Type of liquid and/or type of gaseous fuel; and
- (iii) Fuel consumption (cubic feet of gas ~~and~~ gallons of liquid).

Facilities subject to Regulation XX may maintain a quarterly log for engines that are designated as a process unit on the facility permit.

(3) Recordkeeping for All Engines

All data, logs, test reports and other information required by this rule shall be maintained for at least five years and made available for inspection by the Executive Officer.

(g) Test Methods

Testing to verify compliance with the applicable requirements shall be conducted in accordance with the test methods specified in ~~Table~~ ~~ABLE~~ VIII, or any test methods approved by CARB and EPA, and authorized by the Executive Officer.



TABLE VIII TESTING METHODS	
Pollutant	Method
NO <sub>x</sub>	District Method 100.1
CO	District Method 100.1
VOC	District Method 25.1* or District Method 25.3*

\* Excluding ethane and methane

A violation of any standard of this rule established by any of the specified test methods, or any test methods approved by the CARB or EPA, and authorized by the Executive Officer, shall constitute a violation of this rule.

(h) Exemptions

The provisions of subdivision (d) shall not apply to:

- (1) All orchard wind machines powered by an internal combustion engine.
- (2) Emergency standby engines, engines used for fire-fighting and flood control, and any other emergency engines as approved by the Executive Officer, which have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter, and agricultural emergency standby engines that are exempt from a District permit and operate 200 hours or less per year as determined by an elapsed operating time meter.
- ~~(3) Engines used for fire fighting and flood control.~~
- ~~(34)~~ Laboratory engines used in research and testing purposes.
- ~~(45)~~ Engines operated for purposes of performance verification and testing of engines.
- ~~(6)~~ Engines operating in the Eastern portion of Riverside County not within the South Coast Air Basin or the Salton Sea Air Basin.
- ~~(57)~~ Auxiliary engines used to power other engines or gas turbines during start-ups.
- ~~(8)~~ Supplemental engines which operate between November 1 of one year and April 15 of the following year for the manufacture of snow and/or operation of ski lifts.
- ~~(69)~~ Portable engines that are registered under the state registration program pursuant to Title 13, Article 5 of the CCR.

- (710) Nonroad engines, with the exception that subparagraph (d)(2)(A) shall apply to portable generators.
- (811) Engines operating on San Clemente Island.
- (912) Agricultural stationary engines provided that:
  - (A) The operator submits documentation to the Executive Officer by the applicable date in Table VII when permit applications are due that the applicable electric utility has rejected an application for an electrical line extension to the location of the engines, or the Executive Officer determines that the operator does not qualify, due to no fault of the operator, for funding authorized by California Health and Safety Code Section 44229; and
  - (B) The operator replaces the engines, in accordance with the compliance schedule of Table IX, with engines certified by CARB to meet the Tier 4 emission standards of 40 CFR Part 1039 Section 1039.101, Table 1. These Tier 4 replacement engines shall be considered to comply with Best Available Control Technology; and
  - (C) The operator does not operate the Tier 4 engines in a manner that exceeds the not-to-exceed standards of 40 CFR Section 1039.101, Paragraph (e), as determined by the test methods of subdivision (g) of this rule.

<b>TABLE IX COMPLIANCE SCHEDULE FOR INSTALLATION OF NEW TIER 4 STATIONARY AGRICULTURAL ENGINES</b>	
<b>Action Required</b>	<b>Due Date</b>
Submit to the Executive Officer applications for permits to construct engine modifications, control equipment, or replacement engines	March 1, 2013
Initiate construction of engine modifications, control equipment, or replacement engines	September 30, 2013, or 30 days after the permit to construct is issued, whichever is later
Complete construction and comply with applicable requirements	January 1, 2014, or 60 days after the permit to construct is issued, whichever is later

Complete initial source testing	March 1, 2014, or 120 days after the permit to construct is issued, whichever is later
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- (10) An engine start-up, until sufficient operating temperatures are reached for proper operation of the emission control equipment. The start-up period shall not exceed 30 minutes, unless the Executive Officer approves a longer period for an engine and makes it a condition of the engine permit.
- (11) An engine start-up, after an engine overhaul or major repair requiring removal of a cylinder head, for a period not to exceed four operating hours.
- (12) The initial commissioning of a new engine for a period specified by permit conditions, provided the operator takes measures to reduce emissions and the duration of the commissioning to the extent possible. The commissioning period shall not exceed 150 operating hours.

## **APPENDIX C**

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### **ASSUMPTIONS AND CALCULATIONS**

**PAR 1110.2 Emissions Calculations****ENGINES AND FUEL USAGE**

Emission calculations are based on engines and fuel use data reported in 2005 engine survey plus data added for unreported diesels that are or may be affected by PAR1110.2.

Results for the survey engines are scaled up to represent the full population found in a search of AQMD permitting data base (all active permits and open applications for stationary, non-emergency engines). Scaling factors depend on category--RECLAIM, non-RECLAIM, biogas, diesel (see "Scale Factors" worksheet).

**SCALING FACTORS**

Biogas engines:	Represented in Calc's =	54	Number found in BCAT search =	66	Factor =	0.818
RECLAIM nat gas engines:	Represented in Calc's =	90	Number found in BCAT search =	111	Factor =	0.811
Other nat gas engines:	Represented in Calc's =	481	Number found in BCAT search =	652	Factor =	0.738
Diesel engines:	Represented in Calc's =	30	Number found in BCAT search =	30	Factor =	1.000
		655		859		

**NOx, CO and VOC CONCENTRATIONS (Note Concentrations Summary Table at end of this section):****Baseline Emissions****Biogas Engines**

Baseline emissions are based on NOx limits, landfill gas VOC limits (40 ppm @ 15% O2 as methane), average VOC source test results for digester gas engines based on the survey data, and average CO source test results based on the survey data. In all cases except CEMS-monitored NOx, baseline emissions are assumed to be, on average, 10% above those limits or source test results.

**Rich-Burn Engines**

For non-RECLAIM and RECLAIM BACT engines with NOx CEMS, it is assumed that the NOx level is maintained on average at 80% of the NOx limit.

For RECLAIM Majors, it is assumed that the NOx level is at the apparent "limit", which was calculated from Annual Emissions Report data.

For most rich-burn engines, baseline NOx and CO emissions are based on NOx and CO limits multiplied by factors that are based on AQMD compliance test results.

AQMD compliance tests showed that for engines without CEMS, the average ratio of measured NOx to the NOx limit is 5.19 for BACT engines (NOx limit in 8-23 range)

AQMD compliance tests showed that the average ratio of measured CO to the CO limit follows the relationship  $R-CO = 6.75 - .00306 \times (L - 75)$ ,

For non-BACT engines in RECLAIM, many NOx limits are above the range of the AQMD compliance data (none tested in this category), and it is assumed that baseline NOx

Although compliance testing did not include VOC data, source test data reported in the engine survey showed that VOC levels tend to correspond to roughly the square root of

**Lean-Burn Engines (Excluding Biogas Engines)**

Non-BACT engines (all in RECLAIM): Non-CEMS NOx assumed to be at limit on average, and CO and VOC assumed 10% over source test results on average.

BACT, non-RECLAIM engines: non-CEMS NOx assumed 1.8 x the NOx limit based on AQMD compliance test results; CO and VOC assumed 10% above average

BACT RECLAIM engines (Snow Summit diesels, 50 ppm NOx limit, no CEMS): NOx, CO and VOC assumed to be 10% over limits on average.

**Controlled Emissions (Step 1)**

Step 1 is the increased monitoring requirements that take effect in 2007 - 2009.

Lean-burn engines: Expected to operate at BACT limits or, in absence of BACT limit, at average source test results.

Rich-burn engines that will have NOx/CO CEMS: it is assumed that both NOx and CO will be maintained on average at 80% of their respective limits.

Rich-burn engines subject to Inspection & Monitoring Plans: it is assumed that both NOx and CO will be, on average, no greater than 20% above their respective limits.

**Controlled Emissions (Step 2)**

Step 2 is reduction to NOx/CO/VOC = 11/250/30 ppm @ 15% O2, taking effect in 2010 - 2012.

Engines with BACT limits will be unaffected, and engines in RECLAIM will be unaffected regarding NOx.

Engines that will have NOx and/or CO CEMS: it is assumed that the monitored pollutant(s) will be maintained on average at 80% of their respective limits.

Engines subject to Inspection & Monitoring Plans:

Rich-burn: it is assumed that both NOx and CO will be, on average, no greater than 20% above their respective limits.

Lean-burn: it is assumed that both NOx and CO will be, on average, no greater than their respective limits.

**Concentrations Summary Table:**

	Baseline			Step 1			Step 2			Fuel
	NOx	CO	VOC	NOx	CO	VOC	NOx	CO	VOC	
Biogas >=1000	0.8 x L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	0.8 x 11	250 or S/T	CO% or 30	Biogas
Biogas <1000, New CEMS	1.1 x L	1.1 x S/T	1.1 x S/T	0.8 x L	S/T	S/T	0.8 x 11	250 or S/T	CO% or 30	Biogas
Biogas <1000, I&M	1.1 x L	1.1 x S/T	1.1 x S/T	L	S/T	S/T	11	250 or S/T	CO% or 30	Biogas
Rich BACT RECL Major	0.8 x L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	same	same	f(CO) or 30	NG
Rich BACT RECL Non-Major	f(L)	f(L)	f(CO)	same	f(L)-1.2	f(CO)	same	same	f(CO) or 30	NG
Rich Non-BACT RECL Major	L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	same	0.8 x 250 or same	f(CO) or 30	NG
Rich Non-BACT RECL Non-Major	L	f(L)	f(CO)	same	f(L)-1.2	f(CO)	same	1.2 x 250 or same	f(CO) or 30	NG
Lean BACT RECLAIM Non-Major	1.1 x L	1.1 x L	1.1 x L	L	L	L	same	same	same or 30	Dsl
Lean Non-BACT RECLAIM Major	L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	same	250 or S/T	CO% or 30	NG, Dsl
Lean Non-BACT RECLAIM Non-Major	L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	same	250 or S/T	CO% or 30	NG, Dsl
Rich BACT >=1000	0.8 x L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	0.8 x (11 or L)	0.8 x (250 or L)	f(CO) or 30	NG
Rich BACT <1000, New CEMS	f(L)	f(L)	f(CO)	0.8 x L	f(L)-0.8	f(CO)	0.8 x (11 or L)	0.8 x (250 or L)	f(CO) or 30	NG
Rich BACT <1000, I&M	f(L)	f(L)	f(CO)	1.2 x L	f(L)-1.2	f(CO)	1.2 x (11 or L)	1.2 x (250 or L)	f(CO) or 30	NG
Lean BACT >=1000	0.8 x L	1.1 x L	1.1 x L	same	L	L	same	same	same or 30	NG
Lean BACT <1000, New CEMS	1.8 x L	1.1 x L	1.1 x L	L	L	L	same	same	same or 30	NG
Lean BACT <1000, I&M	1.8 x L	1.1 x L	1.1 x L	L	L	L	same	same	same or 30	NG
Rich Non-BACT >=1000	0.8 x L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	0.8 x 11	0.8 x 250	f(CO) or 30	NG
Rich Non-BACT <1000, New CEMS	f(L)	f(L)	f(CO)	0.8 x L	f(L)-0.8	f(CO)	0.8 x 11	0.8 x 250	f(CO) or 30	NG
Rich Non-BACT <1000, I&M	f(L)	f(L)	f(CO)	1.2 x L	f(L)-1.2	f(CO)	1.2 x 11	1.2 x 250	f(CO) or 30	NG

Notes: L = horsepower-weighted average NOx or CO limit for group or effective "limit" based on actual emissions for some RECLAIM majors; S/T = avg. source test result for group.  
 "CO% or S/T" means same percentage reduction as CO or the averaged source test results for the group, whichever lower.  
 f(L) = calculated ppm using factors derived from AQMD compliance test data (discussed above under "Baseline Emissions").  
 f(CO) = calculated VOC ppm using factors developed from source test data (discussed above under "Baseline Emissions")  
 f(L)-0.8 = calculated ppm using factors based on AQMD compliance data capped at 0.8 x L (discussed above under "Baseline Emissions")  
 f(L)-1.2 = calculated ppm using factors based on AQMD compliance data capped at 1.2 x L (discussed above under "Baseline Emissions")  
 "(X or Y)" means whichever lower.

**NOx, CO, VOC TPY Calculations**

Natural gas: NOx factor is based on 80 ppm NOx @ 3% O2 = 1 lb per MMBtu fuel input (as NO2). For CO, 80 ppm factor becomes 80 x 46 (mol-wt. NO2) / 28 (mol-wt. CO).  
 For VOC (as methane), 80 ppm factor becomes 80 x 46 / 16 (mol-wt. CH4)  
 Diesel: 80 ppm factor becomes 80 x 8710 (EPA Method 19 dry gas factor for natural gas) / 9190 (EPA Method 19 dry gas factor for diesel).  
 Biogas: divide concentration @ 15% O2 by 0.97 to correct for typical 50% CO2 in biogas (resulting in approx. 3% added flue gas volume at 15% O2).

**SOx TPY Calculations**

Natural gas - 1 grain per 100 scf nat gas (CPUC limit); digester gas - 40 ppm as H2S (R431.1); landfill gas - 150 ppm as H2S (R431.1). Assumed 50% methane in digester or landfill gas (biogas).

Diesel - 15 ppm sulfur in fuel.

### PM2.5 TPY Calculations

Natural gas, rich-burn - .0194 lb/MMBtu (AP42); natural gas or biogas lean-burn - .00998 lb/MMBtu (AP42); diesel - 0.1 lb/MMBtu (AP42)

### CO2 TPY Calculations

Natural gas or biogas: TPY CO<sub>2</sub> = fuel input (Btu/Yr) / 23,861 (Btu/lb CH<sub>4</sub>) / 16 (mol-wt. CH<sub>4</sub>) x 44 (mol-wt. CO<sub>2</sub>) / 2000 (lb/ton). Double for biogas (assuming 50% CO<sub>2</sub> on average).  
 Diesel: TPY CO<sub>2</sub> = fuel input (Btu/Yr) / 19,000 (Btu/lb) x .871 (typical wt.-fraction carbon in diesel) / 12 (mol-wt. carbon) x 44 (mol-wt. CO<sub>2</sub>) / 2000 (lb/ton)  
 Subtract TPY CO / 28 (mol-wt. CO) x 44 (mol-wt. CO<sub>2</sub>)

### Usage of Urea (CO[NH<sub>2</sub>]<sub>2</sub>)

Baseline NO<sub>x</sub> (TPY) x (baseline conc. Limit - 11 (future concentration limit) ) / baseline concentration limit / 46 (mol-wt. NO<sub>2</sub>) / 2 (mols NO<sub>x</sub> reduced per mol urea) x 60 (mol-wt. urea)  
 x 1.2 (20 percent excess urea - equivalent to approx. 5 ppm slip for avg. biogas engine NO<sub>x</sub> if all excess ammonia appears in flue gas)

### CO<sub>2</sub> from Urea (CO[NH<sub>2</sub>]<sub>2</sub>)

Baseline NO<sub>x</sub> (TPY) x (baseline conc. Limit - 11 (future concentration limit) ) / baseline concentration limit / 46 (mol-wt. NO<sub>2</sub>) / 2 (mols NO<sub>x</sub> reduced per mol urea) x 44 (mol-wt. CO<sub>2</sub>)  
 x 1.2 (20 percent excess urea - equivalent to approx. 5 ppm slip for avg. biogas engine NO<sub>x</sub> if all excess ammonia appears in flue gas)

### Effects of Three-Way Catalyst Upgrades and Installation of Oxidation Catalysts

It is assumed that three-way catalyst upgrades and new oxidation catalysts both add 1 In. H<sub>2</sub>O pressure drop to engine exhaust.

Added engine work (hp) = .0158 x cfm x In. H<sub>2</sub>O / 85% (typical blower efficiency) - from Babcock & Wilcox Useful Tables

cfm engine exhaust per hp =

rich-burn: 2545 Btu/hp-hr / 0.31 (typical engine effic.) / 1e6 x 8710 scfm per MMBtu @ 0% O<sub>2</sub> (EPA Meth 19) x 1460 / 520 (temperature correction / 60 (min/hr)

lean-burn: above x 20.9/13.9 (corrects to 7% O<sub>2</sub> in flue) x 1260/1460 (corrects gas vol. from 1000F to 800F)

Total catalyst weight per horsepower = 0.615 pound

It was assumed that the volume of the haul trucks would be 20 cubic yards.

### CEMS Power Requirement

= 2.3 kW per CEMS (figure provided by CEMS vendor). For shared CEMS, power use is distributed among engines sharing that CEMS.

### Effect of Possible Electrification of Non-Biogas Engines

Scenarios were selected based on cost calculations - engine categories for which the present-value of the net 10-yr cost of electrification is negative (less than cost of compliance), in order of most negative to least negative on a \$/hp basis.

For generator engines, replacement motor power use = Btu/Yr fuel used by engine x engine efficiency x 0.97 generator efficiency / 3413000 Btu/MWH.

For work engines, replacement motor power use = Btu/Yr fuel used by engine x engine efficiency / 0.97 motor efficiency / 3413000 Btu/MWH.

CO<sub>2</sub> reduction = baseline CO<sub>2</sub> emission less CO<sub>2</sub> from fossil power plants producing required power to replace power or work produce by engine less CO<sub>2</sub> from increased boiler fuel. Increased boiler fuel = baseline fuel to engine x (1-engine effic) x 0.5 / 0.8 (assumes half of engine waste heat was being utilized by facility and must be replaced by increased boiler fuel at 80% boiler efficiency. Increased boiler fuel also produces NO<sub>x</sub> (30 ppm@3%O<sub>2</sub>), CO (100 ppm), SO<sub>x</sub> (1 grn/100 scf as sulfur) and CO<sub>2</sub> emissions.

Grid power replacing engine power or work assumed to be produced 80% by in-basin natural gas plants and 20% by increased power from renewable sources.

Avg. fossil plant effic assumed to be 36% based on USEPA Acid Rain web site. Nat gas consumpt = 3413000 / 0.36 x 0.8 Btu/MWH

Emissions from power plants, based on annual emission reporting x 0.8 (lb/MWH) >>>>>>>

NO<sub>x</sub>, SO<sub>x</sub> from power plants are capped by RECLAIM.

CO<sub>2</sub> ton/MWH = 7.58e6 / 23861 / 16 x 44 / 2000 =

Backup hp needed:

For generator engine replaced, hp = original engine hp

For work engine replaced, hp = original engine hp / 0.97 (typical generator efficiency)

Diesel fuel usage (gal/yr) = backup generator hp x 52.4 hrs/yr typical operation x 2545 Btu/hp-hr / 0.335 / 137000 Btu/gal

Diesel engine operation of 50 hrs/yr is based on 50 hrs testing (max allowed per Rule 1470)

Diesel emissions assume engine meets USEPA Nonroad standards for 2010, ultra low-sulfur diesel, 87% carbon in fuel, 137,000 Btu/gal. It was assumed that the average engine would weigh 14,000 pounds. It was assumed that engines would be tested for 0.5 hours.

**Diesel Emissions**

Diesel Emissions	g/hp-hr:				ton/gal:			
	NOx	CO	VOC	PM	NOx	CO	VOC	PM
Engine Size <50 hp	5.29888579	4.103	0.2961142	0.2238	1.05E-04	8.15E-05	5.88E-06	4.44E-06
Engine Size 50 to <100 hp	3.3206351	3.73	0.1855649	0.2984	6.59E-05	7.41E-05	3.69E-06	5.93E-06
Engine Size 100 to <175 hp	2.82607242	3.73	0.1579276	0.2238	5.61E-05	7.41E-05	3.14E-06	4.44E-06
Engine Size 175 to <300 hp	2.72511416	2.611	0.2588858	0.1492	5.41E-05	5.19E-05	5.14E-06	2.96E-06
Engine Size 300 to <750 hp	2.72511416	2.611	0.2588858	0.1492	5.41E-05	5.19E-05	5.14E-06	2.96E-06
Engine Size >=750 hp	4.28471795	2.611	0.4896821	0.1492	8.51E-05	5.19E-05	9.73E-06	2.96E-06
SOx based on .0015% sulfur in fuel, 7.1 lb/gal					ton/gal =	1.07E-07		
CO2 based on 87 % carbon in fuel, 7.1 lb/gal					ton/gal =	1.13E-02		

**TIMING OF ENGINE CHANGES FOR CEQA ANALYSIS**

**(Most dates are after rule deadlines to be conservative and synchronize dates of multiple requirements closely spaced in time.)**

- 1/1/2008 Biogas engines using efficiency correction factor (ECF) reduce natural gas usage to 10%.  
Non-biogas engines using ECF lose this benefit (lower NOx, VOC limits).
- 1/1/2009 Inspection & Monitoring begins, increased frequency of source testing now affecting majority of engines, air/fuel ratio controllers installed.
- 7/1/2009 CEMS and CO analyzers installed on engines >=500hp, not owned by public agencies.
- 7/1/2010 Limits drop to 11/250/30 (NOx/CO/VOC) for non-biogas engines >=500hp (except low-use engines).  
Biogas engines not using ECF reduce nat gas use to 10%.  
CEMS and CO analyzers installed on engines <500hp, not owned by public agencies and >=500 hp owned by public agencies.
- 7/1/2011 Limits drop to 11/250/30 (NOx/CO/VOC) for non-biogas engines <500hp (except low-use engines).  
CEMS and CO analyzers installed on engines <500hp owned by public agencies.
- 7/1/2012 Limits drop to 11/250/30 (NOx/CO/VOC) for biogas engines except those deferred in Alternative D..
- 7/1/2014 Limits drop to 11/250/30 (NOx/CO/VOC) for biogas engines deferred in Alternative D.

Electrification timing was based on timing of rule requirements that require significant capital investment:

- 1/1/2009 Engines requiring installation of air/fuel ratio controller
- 7/1/2009 Engines requiring CEMS
- 7/1/2010 Engines requiring CEMS, new catalyst or catalyst upgrading
- 7/1/2011 Engines requiring CEMS, new catalyst or catalyst upgrading



**BIOGAS FACILITY ASSUMPTIONS**

General:

Biogas construction is assumed to begin in 2011 after the technology assessment in 2010. Half of the construction is assumed to start in 2011 and the rest in 2012. Biogas operational emissions are assumed to occur in 2012. Both construction and operations will occur in 2012. Some operation (catalyst replacement) will not begin until 2014, since it was assumed that catalysts are replaced every three years. Electricity production by ICE is based on heat input / 3.413E6 Btu/MWH x engine effic x generator effic (0.97) Compressor work produced by ICE is based on heat input / 2545 (Btu/hp-hr) x engine effic. Emissions and electricity production from gas turbine or microturbine are based on heat input and factors below:

	Lbs/MM Btu			
	BOILER	GAS TURBINE	MICROTURBINE	ICE
NOx	0.03	0.084	0.012	0.127
CO	0.0041	0.139	0.047	0.644
VOC	0.0034	0.0048	0.012	0.041
PM	0.0092	0.023	0.0037	0.013
Electr Effic (HHV)	26%		23%	
MWH/MMBtu	0.0761793		0.0673894	

These emission factors are based on averages of source test data in AQMD files. Gas turbine and microturbine electrical efficiencies are typical of equipment used for biogas applications.

SCR Option

Assumed pressure losses (In. H2O) = 3" through gas cleanup, 3" through SCR and 1" through CatOx  
 Reduction in engine output based on hp = .0158 x cfm x In. H2O / 85% efficiency Babcock & Wilcox, Useful Tables, blower equation)  
 Flue gas cfm/hp = 2545 Btu/hp-hr/0.31(effic)/1e6 x 8710 (USEPA Meth 19 dscfm/MMBtu @ 0% O2) x 20.9/13.9 (corrects to

Seven percent flue O2) x 1260/520 (corrects to 800F flue temp.) / 60 min/hr	Fract. Reduct. In Engine Effic. =	3.74E-03
Fuel cfm/hp = 2545/0.31/475 (typical Btu/scf biogas) /60	Fract. Reduct. In Engine Effic. =	<u>1.61E-04</u>
Urea usage is based on 20% excess urea (5 ppm slip at 15% O2); theor. urea (mols) = 0.5 x mols NOx reduced.		3.90E-03
Equivalent ammonia = urea x 34 / 60		

Total catalyst weight per horsepower = 0.615 pound  
 It was assumed that the volume of the haul trucks would be 20 cubic yards.

Gas Turbine Option

Power production = gas turbine power  
 Shaft work = 0  
 Natural gas usage = same as baseline

Microturbine Option

Power production = microturbine power

Shaft work = 0

Natural gas usage = same as baseline

LNG Option

For conversion of biogas to liquified natural gas (LNG), it is assumed that 17.8% of biogas to the conversion process is used in a boiler to produce heat required by the process (based on Prometheus process data).

For conversion of digester gas to LNG, it is assumed that the replaced ICE was providing heat to the digester process equal to engine waste heat (heat input x (1 - engine effic)) x 0.5 (waste heat recovery factor) and that heat must now be provided by firing biogas in a boiler at 80% efficiency.

Emissions from boiler are based on factors in table above.

Power used by LNG production process = .0441 MWH per MMBtu LNG product (based on Prometheus process data).

The size of the LNG tank was estimated based on amount of LNG that could be produced over a period of five days based on the permit application for the Frank Bowerman Landfill LNG plant.

The transport trucks were assumed to have 10,000 gallon tanks days based on the permit application for the Frank Bowerman Landfill LNG plant.

Diesel/Natural Gas Usage by Emergency Backup Generator

Size of backup generator needed (HP): landfill case = none needed

Replacement of compressor with turbine:  $HP = ICE\ HP \times (1 - \text{turbine elec effic} / (ICE\ \text{effic} \times 0.97))$

Elimination of compressor:  $HP = ICE\ HP / 0.97$

Backup LNG power requirement:  $HP = \text{LNG product MMBTU/yr} \times .0441\ \text{MWH/MMBTU} / 8000\ \text{hrs/yr on line} / .000746\ \text{MW/HP} / 0.97\ (\text{motor/generator effic})$

It is assumed that 20% of backup capacity will be diesel and 80% will be natural gas (using the existing biogas engine).

$\text{Gal/Yr diesel fuel} = HP \times 52.4\ (\text{diesel engine hrs/yr}) / 8000\ (\text{turbine or LNG plant on-line hrs/yr}) \times 3413000$

$(\text{Btu/MWH}) / 0.335\ (\text{typical diesel engine efficiency}) / 137,000\ (\text{Btu/gal}) \times 0.2$

$\text{Natural gas use for backup power (Btu/Yr)} = \text{gal/yr diesel} \times 137,000 / 0.2 \times 0.8$

Backup engine operation of 50 hrs/yr is based on 50 hrs testing (max allowed per Rule 1470)

It was assumed that engines would be tested for one hour on any given day.

Diesel Emissions	g/hp-hr:				ton/gal:			
	NOx	CO	VOC	PM	NOx	CO	VOC	PM
Engine Size <50 hp	5.30	4.10	0.30	0.224	1.12E-04	8.68E-05	6.26E-06	4.74E-06
Engine Size 50 to <75 hp	3.3206351	3.73	0.1855649	0.2984	7.03E-05	7.89E-05	3.93E-06	6.32E-06
Engine Size 75 to <175 hp	2.8260724	3.73	0.1579276	0.2238	5.98E-05	7.89E-05	3.34E-06	4.74E-06
Engine Size 175 to <750 hp	2.7251142	2.611	0.2588858	0.1492	5.77E-05	5.53E-05	5.48E-06	3.16E-06
Engine Size >=750 hp	4.2847179	2.611	0.4896821	0.1492	9.07E-05	5.53E-05	1.04E-05	3.16E-06
SOx based on .0015% sulfur in fuel, 7.1 lb/gal					ton/gal =	1.07E-07		
CO2 based on 87 % carbon in fuel, 7.1 lb/gal					ton/gal =	1.13E-02		

Pretreatment Carbon Assumptions

The amount of carbon used at a facility was estimated from the amount of carbon used at Orange County Sanitation District Facility Number 1 (OCSD No. 1) by ratio the horsepower of the engines at OCSD No. 1.

The number of trips was estimated by the number of 6,800 pound vessels that need to be replaced.

It was assumed that all biogas facilities would need pre-treatment for add-on control and ICE alternative technology.

It was assumed that an equal number of trips would occur for both spent carbon removal and new carbon delivery.

**Table C-1  
Operational Emissions from Requirements of PAR 1110.2 Only (i.e, No Secondary Emissions)**

**Non-Biogas Engines**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
Baseline	7,336	44,688	1,611	87	741	680,612
2008	7,210	44,688	1,611	87	741	680,612
2009	5,056	14,192	1,065	87	741	689,358
2010	4,725	10,162	613	87	741	690,514
2011	4,388	7,305	566	87	741	691,333
2012	4,388	7,305	566	87	741	691,333
2014	4,388	7,305	566	87	741	691,333

**Table C-1 (Continued)**  
**Operational Emissions from Requirements of PAR 1110.2 Only (i.e, No Secondary Emissions)**

**Biogas Engines**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
Baseline	1,859	9,555	882	464	136	569,435
2008	1,781	9,176	846	456	130	546,588
	1,786	9,209	855	457	131	-
2009	1,765	8,342	769	456	130	546,827
	1,770	8,375	778	457	131	-
2010	1,722	8,152	753	454	128	535,925
	1,727	8,185	762	455	129	-
2011	1,714	8,152	753	454	128	535,925
	1,719	8,185	762	455	129	-

**Biogas Engines – Addition of SCR or NOx Tech**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
2012	472	8,092	555	464	136	569,999
2014	472	8,092	555	464	136	569,999

**Biogas Engines – Replacement with Gas Turbines**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
2012	5,536	9,205	632	551	1,056	1,260,768
2014	5,536	9,205	632	551	1,056	1,260,768

**Biogas Engines – Replacement with Microturbines**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
2012	4,552	7,948	730	551	792	1,260,768
2014	4,552	7,948	730	551	792	1,260,768

**Table C-1 (Concluded)  
Operational Emissions from Requirements of PAR 1110.2 Only (i.e, No Secondary Emissions)**

**Biogas Engines – Replacement of Digester Gas ICE with Gas Turbines Landfill Gas ICE with LNG Plants**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
2012	4,901	8,090	598	224	883	1,122,319
2014	4,901	8,090	598	224	883	1,122,319

**Biogas Engines – Replacement of Digester Gas ICE with Microturbines Landfill Gas ICE with LNG Plants**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM-2.5, lb/day	CO2, ton/year
2012	4,497	7,574	638	224	775	1,122,319
2014	4,497	7,574	638	224	775	1,122,319

**Table C-2A  
Biogas Diesel Emergency Engine Emissions**

**Replace ICEs with Gas turbines - Diesel Emergency**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM, lb/day	CO2, ton/year	Mitigated PM lb/day
2012	9.4	7.5	0.96	0.01	0.42	15.8	0.063

**Replace ICEs with Microturbines - Diesel Emergency**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM, lb/day	CO2, ton/year	Mitigated PM lb/day
2012	22.6	15.7	2.46	0.02	0.89	22.9	0.133

**Replace ICEs LFG w LNG, DG w Turbines - Diesel Emergency**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM, lb/day	CO2, ton/year	Mitigated PM lb/day
2012	9.4	7.5	0.96	0.01	0.42	15.8	0.063

**Table C-2A (Concluded)**  
**Biogas Diesel Emergency Engine Emissions**

**Replace ICEs LFG w LNG, DG w Microturbines - Diesel Emergency**

Year	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM, lb/day	CO <sub>2</sub> , ton/year	Mitigated PM lb/day
2012	22.6	15.7	2.46	0.02	0.89	22.9	0.133

## Notes:

Assumed that the emergency generators were needed to provide electricity to compensate for pressure drops caused by add-on control equipment or efficiency losses from the replacement of ICEs with alternative technologies (e.g., gas turbines, microturbines, etc.).

Assumed only digester gas facilities would need emergency generators.

Assumed only 20 percent of digester facilities would use diesel fueled emergency generators

Emission factors from USEPA Emission Standards for Nonroad diesel engines, 40CFR, Part 89 - Control of Emissions from New and In-Use Compression-Ignition Engines  
 50 hours of operation a year assumed pursuant to Rule 1470.

One hour of operation per test.

ARB has validated diesel particulate filters for stationary ICE as at least 85 percent efficient.

**Table C-2B**  
**Biogas Natural Gas Emergency Engine Emissions**

**Replace ICE with Gas turbines - NG emergency**

Year	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM, lb/day	CO <sub>2</sub> , ton/year
2012	14.5	70.4	6.4	0.28	1.9	218

**Replace ICE with Microturbines - NG emergency**

Year	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM, lb/day	CO <sub>2</sub> , ton/year
2012	20.6	99.6	9.1	0.40	2.8	316

**Replace ICE LFG w LNG, DG w Turbines - NG emergency**

Year	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM, lb/day	CO <sub>2</sub> , ton/year
2012	14.5	70.4	6.4	0.28	1.9	218

**Table C-2B (Concluded)**  
**Biogas Natural Gas Emergency Engine Emissions**

**Replace ICE LFG w LNG, DG w Microturbines - NG emergency**

<b>Year</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM, lb/day</b>	<b>CO2, ton/year</b>
2012	20.6	99.6	9.1	0.40	2.8	316

Notes:

Assumed only digester gas facilities would need emergency generators.

Assumed only 80 percent of digester facilities would use existing natural gas fueled engines as emergency generators.

Existing engine emissions used.

50 hours of operation a year assumed.

One hour of operation per test.

**Table C-3  
Biogas Power Plant Emissions**

**Install SCR - Power Plant Emissions - Daily**

<b>Year</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>PM, lb/day</b>	<b>CO2, ton/year</b>
2012	50.5	4.1	5.3	15.0

**Replace with Microturbines - Power Plant Emissions - Daily**

<b>Year</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>PM, lb/day</b>	<b>CO2, ton/year</b>
2012	82.7	6.7	8.6	24.6

**Replace LFG w LNG, DG w Turbines - Power Plant Emissions - Daily**

<b>Year</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>PM, lb/day</b>	<b>CO2, ton/year</b>
2012	292	23.5	30.5	86.9

**Replace LFG w LNG, DG w Microturbines - Power Plant Emissions - Daily**

<b>Year</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>PM, lb/day</b>	<b>CO2, ton/year</b>
2012	305	24.6	31.9	90.9



**Table C-4  
Non-Biogas Effects of Replacing ICE with Electric Motors**

**Decreased Emissions from Engines**

<b>Year</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM, lb/day</b>	<b>CO2, ton/year</b>	<b>Diesel Backup Generator, HP</b>	<b>Diesel Backup Generator Fuel Use, Gal/Yr</b>
2009	432	161	48.9	1.3	15.7	11,781	432	161
2010	856	1,328	137	8.8	50.7	67,378	856	1,328
2011	1,044	2,507	175	14.3	87.9	107,276	1,044	2,507

To determine impacts of electrification on CO2 and criteria pollutant emission, staff has calculated the reduction in engine emissions and the increase in emissions from electrical generation, from boilers that would have to provide thermal energy to replace the thermal energy from an engine in cogeneration use, and from any backup diesel generators installed. The following assumptions were used:

- Engine generator efficiency of 97 percent (engine mechanical output to electrical output).
- Electric motor efficiency of 97 percent.
- For cogeneration engines, 50 percent of the waste heat from the energy is recovered.
- Boiler efficiency of 80 percent.
- Grid power replacing engine power or work is supplied by modern natural gas power plants (80 percent) and by renewable energy sources (20 percent).
- Average power plant efficiency in the district is 36 percent high heating value (HHV) based on USEPA Acid Rain web site data for 2005.
- CO2 from natural gas combustion is 1,009 SCF at 68°F per million Btu of fuel input (HHV), based on a stoichiometric calculation for methane.
- Boiler criteria pollutant emissions based on 30 ppmvd NOx, and 100 ppmvd CO, corrected to three percent O2.
- Twenty percent of facilities that electrify will install a backup diesel generator. Remainder will convert the natural gas engine to backup use (40 percent), or go without a backup (40 percent).
- Backup diesel efficiency is 33.5 percent HHV.
- Backup generator operated for 50 hours per year.
- Backup generator emissions based on USEPA Tier 3 emission standards for up to 750 bhp and Tier 2 over 750 bhp.
- Diesel fuel specifications are 137,000 Btu per gallon and 88 percent carbon by weight and ultralow sulfur (15 ppmw).
- CO2 reductions from the replacement of non-biogas ICEs with electric motors were assumed to occur over the lifetime of the electric motors (10 years).

**Table C-4 (Continued)**  
**Non-Biogas Effects of Replacing ICE with Electric Motors**

**Power Plant Emissions**

Year	CO, lb/day	VOC, lb/day	PM, lb/day	CO2, ton/year
2009	12.2	1.0	1.3	7,272
2010	80.2	6.5	8.4	47,744
2011	126	10.2	26.4	75,098

**Diesel Emergency Engine Emissions**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM, lb/day	CO2, ton/year	Mitigated PM, lb/day
2009	10.2	6.8	1.14	0.01	0.39	37	0.058
2010	120	78.8	13.3	0.16	4.5	430	0.68
2011	159	118	16.9	0.24	6.6	1,258	0.99

**Natural Gas Emergency Emissions**

Year	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM, lb/day	CO2, ton/year
1/1/2009	11.2	5.4	2.0	0.035	0.24	35
7/1/2009	11.3	5.8	2.1	0.039	0.27	51
7/1/2010	55.2	134.1	28.9	0.50	3.4	590
7/1/2011	68.7	262	31.0	0.61	4.2	981

CO2 reduction = baseline CO2 emission less CO2 from fossil power plants producing required power to replace power or work produce by engine less CO2 from increased boiler fuel. Increased boiler fuel = baseline fuel to engine x (1-engine effic) x 0.5 / 0.8 (assumes half of engine waste heat was being utilized by facility and must be replaced by increased boiler fuel at 80% boiler efficiency. Increased boiler fuel also produces NOx (30 ppm@3%O2), CO (100 ppm), SOx (1 grn/100 scf as sulfur) and CO2 emissions.

Grid power replacing engine power or work assumed to be produced 80% by in-basin natural gas plants and 20% by increased power from renewable sources.

Avg. fossil plant effic assumed to be 36% based on USEPA Acid Rain web site. Nat gas consumpt = 3413000 / 0.36 x 0.8 Btu/MWH

Emissions from power plants, based on annual emission reporting x 0.8 (lb/MWH)

NOx, SOx from power plants are capped by RECLAIM.

CO2 ton/MWH = 7.58e6 / 23861 / 16 x 44 / 2000

Selected based on cost calculations - engine categories for which the present-value of the net 10-yr cost of electrification is negative (less than cost of compliance), in order of most negative to least negative on a \$/hp basis.

There were 225 engines identified where it would be less to replace the engine with an electric motor than to comply with PAR 1110.2. Of the 225 engines, SCAQMD staff assumed that 75 percent of these engines (169 engines) would be replaced by facility operators.

It was assumed that 20 percent of the engines replaced would need diesel emergency generators, 40 percent of the engines replaced would need natural gas emergency generators, and 40 percent would not need emergency generators.

**Table C-5**  
**PAR 1110.2 Cost Effectiveness Calculations**

	1	2	3	4	5	6	7	8	9
Fuel	BIOGAS	BIOGAS	BIOGAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	DIESEL	NATURAL GAS
RECLAIM?				RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM
BACT?				BACT	BACT	NON-BACT	NON-BACT	BACT	NON-BACT
Rich-Burn or Lean-Burn?				RICH	RICH	RICH	RICH	LEAN	LEAN
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	MAJOR	NON-MAJOR	MAJOR	NON-MAJOR	NON-MAJOR	MAJOR
Need CEMS?		YES	NO						
Number of Engines (Survey Data)	41	7	6	1	16	1	36	6	25
Number of Engines (Total Population)	50	9	7	1	20	1	44	6	31
Average HP (Survey Data)	2,682	614	639	2,000	568	2,068	333	3,043	2,646
New CEMS (Total Population)		2.79							
Fuel Consumption, Btu/Yr (Total Population)	8.81E+12	3.63E+11	2.94E+11	1.31E+11	7.46E+11	1.36E+11	9.62E+11	1.11E+12	5.39E+12
Average NOx Limit, ppmvd @ 15% O2	43.3	38.1	38.1	9.0	15.9	13.8	130.0	50.0	149.4
Average CO Limit, ppmvd @ 15% O2	1225.8	1914.8	1914.8	60.0	98.8	260.2	2000.0	66.0	1896.2
Average VOC Limit, ppmvd @ 15% O2	106.8	245.0	245.0	26.0	106.3	132.0	250.0	22.0	247.9
Baseline NOx, ppmvd @ 15% O2	34.6	41.9	41.9	7.2	82.5	13.8	130.0	55.0	149.4
Baseline CO, ppmvd @ 15% O2	291.3	336.2	336.2	396.0	640.4	1557.9	1327.3	72.6	150.1
Baseline VOC, ppmvd @ 15% O2	47.5	51.5	51.5	18.5	23.5	43.4	40.1	24.2	135.0
Baseline NOx, TPY	596.4	29.7	24.1	1.8	116.7	3.6	237.2	122.1	1,526.3
Baseline CO, TPY	3,052.4	145.2	117.5	60.0	551.4	244.2	1,474.2	98.1	933.0
Baseline VOC, TPY	284.5	12.7	10.3	1.6	11.6	3.9	25.4	18.7	479.8
Controlled NOx (Step 1), ppmvd @ 15% O2	34.6	30.5	38.1	7.2	82.5	13.8	130.0	55.0	149.4
Controlled CO (Step 1), ppmvd @ 15% O2	264.8	305.6	305.6	27.7	58.1	115.8	819.6	66.0	136.4
Controlled VOC (Step 1), ppmvd @ 15% O2	43.2	46.8	46.8	4.9	7.1	11.8	31.5	22.0	122.8
Controlled NOx, TPY	596.4	21.6	21.9	1.8	116.7	3.6	237.2	122.1	1,526.3
Controlled CO, TPY	2,774.9	132.0	106.8	4.2	50.0	18.2	910.4	89.2	848.2
Controlled VOC, TPY	258.6	11.5	9.3	0.4	3.5	1.1	20.0	17.0	436.1
Step 1 (NOx+VOC+CO/7) Reduction, 10-Yr Tons	655	111	46	92	797	351	860	30	557
Controlled NOx (Step 2), ppmvd @ 15% O2	8.8	8.8	11.0	7.2	82.5	13.8	130.0	55.0	149.4
Controlled CO (Step 2), ppmvd @ 15% O2	200.0	250.0	250.0	27.7	58.1	115.8	300.0	66.0	136.4
Controlled VOC (Step 2), ppmvd @ 15% O2	30.0	30.0	30.0	4.9	7.1	11.8	19.1	22.0	30.0
Controlled NOx, TPY	151.5	6.2	6.3	1.8	116.7	3.6	237.2	122.1	1,526.3
Controlled CO, TPY	2,096.0	108.0	87.4	4.2	50.0	18.2	333.2	89.2	848.2
Controlled VOC, TPY	179.7	7.4	6.0	0.4	3.5	1.1	12.1	17.0	106.6
Step 2 (NOx+VOC+CO/7) Reduction, 10-Yr Tons	6,209	230	217	0	0	0	903	0	3,296

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	10	11	12	13	14	15	16	17	18
Fuel	DIESEL	NATURAL GAS	DIESEL	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS
RECLAIM?	RECLAIM	RECLAIM	RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM
BACT?	NON-BACT	NON-BACT	NON-BACT	BACT	BACT	BACT	BACT	BACT	BACT
Rich-Burn or Lean-Burn?	LEAN	LEAN	LEAN	RICH	RICH	RICH	LEAN	LEAN	LEAN
=>1000 HP or NOx-Major?	MAJOR	NON-MAJOR	NON-MAJOR	=>1000	<1000	<1000	=>1000	<1000	<1000
Need CEMS?					YES	NO		YES	NO
Number of Engines (Survey Data)	6	11	18	28	39	209	16	2	1
Number of Engines (Total Population)	6	14	18	38	53	283	22	3	1
Average HP (Survey Data)	2,213	519	478	1,674	716	286	2,144	880	898
New CEMS (Total Population)					18.13			1.36	
Fuel Consumption, Btu/Yr (Total Population)	8.07E+11	4.78E+11	5.23E+11	4.18E+12	2.49E+12	5.32E+12	3.10E+12	1.73E+11	5.90E+10
Average NOx Limit, ppmvd @ 15% O2	218.0	128.1	516.0	9.8	11.3	11.3	9.3	13.0	13.0
Average CO Limit, ppmvd @ 15% O2	2000.0	1743.9	2000.0	60.4	72.0	72.0	61.6	85.3	85.3
Average VOC Limit, ppmvd @ 15% O2	285.0	235.6	250.0	25.1	30.5	30.5	27.2	37.3	37.3
Baseline NOx, ppmvd @ 15% O2	218.0	128.1	516.0	7.8	58.6	58.6	7.4	23.4	23.4
Baseline CO, ppmvd @ 15% O2	10.8	188.4	221.4	398.6	472.6	472.6	67.8	93.8	93.8
Baseline VOC, ppmvd @ 15% O2	5.1	129.2	106.5	18.6	20.2	20.2	29.9	41.0	41.0
Baseline NOx, TPY	352.0	116.0	539.8	62.1	277.2	591.1	43.7	7.7	2.6
Baseline CO, TPY	10.6	103.8	141.0	1,921.9	1,359.4	2,899.4	242.3	18.8	6.4
Baseline VOC, TPY	2.8	40.7	38.7	51.2	33.2	70.9	61.1	4.7	1.6
Controlled NOx (Step 1), ppmvd @ 15% O2	218.0	128.1	516.0	7.8	9.0	13.6	7.4	13.0	13.0
Controlled CO (Step 1), ppmvd @ 15% O2	9.8	171.3	201.3	27.9	33.1	42.5	61.6	85.3	85.3
Controlled VOC (Step 1), ppmvd @ 15% O2	4.6	117.5	96.8	4.9	5.4	6.1	27.2	37.3	37.3
Controlled NOx, TPY	352.0	116.0	539.8	62.1	42.7	136.7	43.7	4.3	1.5
Controlled CO, TPY	9.6	94.4	128.2	134.3	95.3	260.8	220.3	17.1	5.8
Controlled VOC, TPY	2.6	37.0	35.2	13.5	8.8	21.3	55.6	4.3	1.5
Step 1 (NOx+VOC+CO/7) Reduction, 10-Yr Tons	4	50	54	2,930	4,395	8,810	87	41	14
Controlled NOx (Step 2), ppmvd @ 15% O2	218.0	128.1	516.0	7.8	9.0	13.6	7.4	13.0	13.0
Controlled CO (Step 2), ppmvd @ 15% O2	9.8	171.3	201.3	27.9	33.1	42.5	61.6	85.3	85.3
Controlled VOC (Step 2), ppmvd @ 15% O2	4.6	30.0	30.0	4.9	5.4	6.1	27.2	30.0	30.0
Controlled NOx, TPY	352.0	116.0	539.8	62.1	42.7	136.7	43.7	4.3	1.5
Controlled CO, TPY	9.6	94.4	128.2	134.3	95.3	260.8	220.3	17.1	5.8
Controlled VOC, TPY	2.6	9.4	10.9	13.5	8.8	21.3	55.6	3.4	1.2
Step 2 (NOx+VOC+CO/7) Reduction, 10-Yr Tons	0	276	243	0	0	0	0	8	3

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	19	20	21	
Fuel	NATURAL GAS	NATURAL GAS	NATURAL GAS	
RECLAIM?	NON- RECLAIM	NON- RECLAIM	NON- RECLAIM	
BACT?	NON-BACT	NON-BACT	NON-BACT	
Rich-Burn or Lean-Burn?	RICH	RICH	RICH	
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	TOTALS
Need CEMS?		YES	NO	
Number of Engines (Survey Data)	5	15	166	655
Number of Engines (Total Population)	7	20	225	859
Average HP (Survey Data)	1,172	665	249	
New CEMS (Total Population)		5.87		28.15
Fuel Consumption, Btu/Yr (Total Population)	5.39E+11	8.74E+11	3.68E+12	4.015E+13
Average NOx Limit, ppmvd @ 15% O2	36.0	45.6	45.6	
Average CO Limit, ppmvd @ 15% O2	2000.0	1956.2	1956.2	
Average VOC Limit, ppmvd @ 15% O2	250.0	277.2	277.2	
Baseline NOx, ppmvd @ 15% O2	28.8	96.7	96.7	
Baseline CO, ppmvd @ 15% O2	1327.3	1560.4	1560.4	
Baseline VOC, ppmvd @ 15% O2	40.1	43.5	43.5	
Baseline NOx, TPY	29.4	160.1	674.5	5,514
Baseline CO, TPY	825.5	1,573.2	6,627.1	22,406
Baseline VOC, TPY	14.2	25.0	105.5	1,298
Controlled NOx (Step 1), ppmvd @ 15% O2	28.8	36.48	54.72	
Controlled CO (Step 1), ppmvd @ 15% O2	609.3	602.9	809.7	
Controlled VOC (Step 1), ppmvd @ 15% O2	27.2	27.0	31.3	
Controlled NOx, TPY	29.4	60.4	381.8	4,418
Controlled CO, TPY	378.9	607.8	3,438.8	10,325
Controlled VOC, TPY	9.6	15.6	76.0	1,038
Step 1 (NOx+VOC+CO/7) Reduction, 10-Yr Tons	684	2,471	7,777	30,816
Controlled NOx (Step 2), ppmvd @ 15% O2	8.8	8.8	13.2	
Controlled CO (Step 2), ppmvd @ 15% O2	200.0	200.0	300.0	
Controlled VOC (Step 2), ppmvd @ 15% O2	15.6	15.6	19.1	
Controlled NOx, TPY	9.0	14.6	92.1	3,586
Controlled CO, TPY	124.4	201.6	1,274.1	6,200
Controlled VOC, TPY	5.5	9.0	46.2	521
Step 2 (NOx+VOC+CO/7) Reduction, 10-Yr Tons	609	1,105	6,287	19,384

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	1	2	3	4	5	6	7	8	9	
Fuel	BIOGAS	BIOGAS	BIOGAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	DIESEL	NATURAL GAS	
RECLAIM?				RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM	
BACT?				BACT	BACT	NON-BACT	NON-BACT	BACT	NON-BACT	
Rich-Burn or Lean-Burn?				RICH	RICH	RICH	RICH	LEAN	LEAN	
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	MAJOR	NON-MAJOR	MAJOR	NON-MAJOR	NON-MAJOR	MAJOR	
<b>Step 1 Eliminate Excess Emissions</b>										
Add CO Analyzer										
Initial Cost, \$		0	0	0	19,000	0	19,000	0	0	0
Annual O&M Cost, \$		0	0	0	0	0	0	0	0	0
New CEMS										
Initial Cost, \$		0	699,492	0	0	0	0	0	0	0
Annual O&M Cost, \$		0	190,885	0	0	0	0	0	0	0
Add AFRC										
Initial Cost, \$		0	0	140,000	0	0	0	0	0	0
Annual O&M Cost, \$		0	0	5,040	0	0	0	0	0	0
Incr Source Testing and I&M Program										
Initial Cost, \$	171,443	30,860	24,002	0	68,577	0	150,870	20,573	106,295	
Annual O&M Cost, \$	313,348	56,403	73,269	0	306,939	0	675,266	37,602	194,276	
Total Initial Cost, \$	171,443	730,352	164,002	19,000	68,577	19,000	150,870	20,573	106,295	
Total Annual O&M Cost, \$	313,348	247,288	78,309	0	306,939	0	675,266	37,602	194,276	
Present Value of 10-Yr Costs, \$	2,816,101	2,817,463	824,928	19,000	2,659,144	19,000	5,850,118	337,932	1,745,983	
<b>Step 1 Cost Eff, \$ per ton pollutants</b>	<b>4,299</b>	<b>25,270</b>	<b>17,745</b>	<b>207</b>	<b>3,335</b>	<b>54</b>	<b>6,802</b>	<b>11,367</b>	<b>3,133</b>	

**Table C –5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	10	11	12	13	14	15	16	17	18
Fuel	DIESEL	NATURAL GAS	DIESEL	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS
RECLAIM?	RECLAIM	RECLAIM	RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM
BACT?	NON-BACT	NON-BACT	NON-BACT	BACT	BACT	BACT	BACT	BACT	BACT
Rich-Burn or Lean-Burn?	LEAN	LEAN	LEAN	RICH	RICH	RICH	LEAN	LEAN	LEAN
=>1000 HP or NOx-Major?	MAJOR	NON-MAJOR	NON-MAJOR	=>1000	<1000	<1000	=>1000	<1000	<1000
<b><u>Step 1 Eliminate Excess Emissions</u></b>									
Add CO Analyzer									
Initial Cost, \$	114,000	0	0	722,000	0	0	0	0	0
Annual O&M Cost, \$	0	0	0	0	0	0	0	0	0
New CEMS									
Initial Cost, \$	0	0	0	0	4,494,928	0	0	291,450	0
Annual O&M Cost, \$	0	0	0	0	1,157,627	0	0	72,100	0
Add AFRC									
Initial Cost, \$	0	280,000	360,000	0	0	0	0	0	20,000
Annual O&M Cost, \$	0	10,080	12,960	0	0	0	0	0	720
Incr Source Testing and I&M Program									
Initial Cost, \$		48,004	61,719	0	0	970,367	75,435	10,287	3,429
Annual O&M Cost, \$		87,737	112,805	0	0	4,343,190	137,873	18,801	10,467
Total Initial Cost, \$	114,000	328,004	421,719	722,000	4,494,928	970,367	75,435	301,736	23,429
Total Annual O&M Cost, \$	0	97,817	125,765	0	1,157,627	4,343,190	137,873	90,901	11,187
Present Value of 10-Yr Costs, \$	114,000	1,153,583	1,483,179	722,000	14,265,303	37,626,893	1,239,084	1,068,942	117,847
<b>Step 1 Cost Eff, \$ per ton pollutants</b>	<b>28,795</b>	<b>22,847</b>	<b>27,703</b>	<b>246</b>	<b>3,246</b>	<b>4,271</b>	<b>14,236</b>	<b>26,137</b>	<b>8,471</b>

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	19	20	21	
Fuel	NATURAL GAS	NATURAL GAS	NATURAL GAS	
RECLAIM?	NON- RECLAIM	NON- RECLAIM	NON- RECLAIM	
BACT?	NON-BACT	NON-BACT	NON-BACT	
Rich-Burn or Lean-Burn?	RICH	RICH	RICH	
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	TOTALS
<b><u>Step 1 Eliminate Excess Emissions</u></b>				
Add CO Analyzer				
Initial Cost, \$	133,000	0	0	1,007,000
Annual O&M Cost, \$	0	0	0	0
New CEMS				
Initial Cost, \$	0	1,554,923	0	7,040,793
Annual O&M Cost, \$	0	417,435	0	1,838,048
Add AFRC				
Initial Cost, \$	0	0	0	800,000
Annual O&M Cost, \$	0	0	0	28,800
Incr Source Testing and I&M Program				
Initial Cost, \$	0	0	771,494	2,513,354
Annual O&M Cost, \$	0	0	3,453,066	9,821,043
Total Initial Cost, \$	133,000	1,554,923	771,494	11,361,147
Total Annual O&M Cost, \$	0	417,435	3,453,066	11,687,891
Present Value of 10-Yr Costs, \$	133,000	5,078,070	29,915,374	110,006,945
<b>Step 1 Cost Eff, \$ per ton pollutants</b>	<b>194</b>	<b>2,055</b>	<b>3,847</b>	<b>3,570</b>



**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	1	2	3	4	5	6	7	8	9
Fuel	BIOGAS	BIOGAS	BIOGAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	DIESEL	NATURAL GAS
RECLAIM?				RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM
BACT?				BACT	BACT	NON-BACT	NON-BACT	BACT	NON-BACT
Rich-Burn or Lean-Burn?				RICH	RICH	RICH	RICH	LEAN	LEAN
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	MAJOR	NON-MAJOR	MAJOR	NON-MAJOR	NON-MAJOR	MAJOR
	Gas Cleanup System, SCR and Oxidation Catalyst	Gas Cleanup System, SCR and Oxidation Catalyst	Gas Cleanup System, SCR and Oxidation Catalyst				Upgrade Three-Way Catalyst		Install Oxidation Catalyst
<b><u>Step 2: Reduce Emissions to NOx/CO/VOC = 11/250/30 ppm @ 15% O2</u></b>									
Initial Cost, \$	55,201,256	3,733,484	2,903,821				836,264		1,193,872
Annual O&M Cost, \$	8,316,509	508,009	395,118				232,115		182,549
Present Value of 10-Yr Costs, \$	125,392,596	8,021,083	6,238,620				2,795,312		2,734,583
<b>Step 2 Cost Eff, \$ per ton pollutants</b>	<b>20,197</b>	<b>34,940</b>	<b>28,756</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>3,094</b>	<b>NA</b>	<b>830</b>
Steps 1+ 2 Total Initial Cost, \$	55,372,699	4,463,836	3,067,823	19,000	68,577	19,000	987,134	20,573	1,300,167
Steps 1+ 2 Total Annual O&M Cost, \$	8,629,858	755,297	473,427	0	306,939	0	907,381	37,602	376,824
Present Value of 10-Yr Costs, \$	128,208,697	10,838,546	7,063,548	19,000	2,659,144	19,000	8,645,429	337,932	4,480,565
<b>Steps 1+2 Cost Eff, \$ per ton pollutants</b>	<b>18,679</b>	<b>31,778</b>	<b>26,813</b>	<b>207</b>	<b>3,335</b>	<b>54</b>	<b>4,902</b>	<b>11,367</b>	<b>1,163</b>
<b><u>Alternative Technology</u></b>				Electrify	Electrify	Electrify	Electrify	Electrify	Electrify
DG Engines (Survey)				0	7	1	5	6	1
DG Engines (Total Population)					9	1	6	6	1
DG Engines--Avg. HP					714	2068	690	3043	3000
Non-DG Engines (Total Population)				1	11		38		30
Non-DG Engines--Avg. HP				2000	454		275		2631
<b><u>DG Engines:</u></b>									
(NOx+VOC+CO/7) Reduction, 10-Yr Tons					1,140	415	1,327	1,515	772
Initial Cost, \$					1,309,376	390,432	846,867	3,400,883	559,035
Annual O&M Cost, \$					104,516	71,687	-37,953	569,812	-108,635
Present Value of 10-Yr Costs, \$					2,191,492	995,473	526,547	8,210,095	-357,844

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	10	11	12	13	14	15	16	17	18
Fuel	DIESEL	NATURAL GAS	DIESEL	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS
RECLAIM?	RECLAIM	RECLAIM	RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM
BACT?	NON-BACT	NON-BACT	NON-BACT	BACT	BACT	BACT	BACT	BACT	BACT
Rich-Burn or Lean-Burn?	LEAN	LEAN	LEAN	RICH	RICH	RICH	LEAN	LEAN	LEAN
=>1000 HP or NOx-Major?	MAJOR	NON-MAJOR	NON-MAJOR	=>1000	<1000	<1000	=>1000	<1000	<1000
<b>Step 2: Reduce Emissions to NOx/CO/VOC = 11/250/30 ppm @ 15% O2</b>		Install Oxidation Catalyst	Install Oxidation Catalyst					Install Oxidation Catalyst	Install Oxidation Catalyst
Initial Cost, \$		178,931	230,054					38,342	12,781
Annual O&M Cost, \$		22,402	28,802					4,800	1,600
Present Value of 10-Yr Costs, \$		368,003	473,147					78,858	26,286
<b>Step 2 Cost Eff, \$ per ton pollutants</b>	<b>NA</b>	<b>1,335</b>	<b>1,946</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>9,446</b>	<b>9,257</b>
Steps 1+ 2 Total Initial Cost, \$	114,000	506,935	651,774	722,000	4,494,928	970,367	75,435	340,079	36,210
Steps 1+ 2 Total Annual O&M Cost, \$	0	120,219	154,568	0	1,157,627	4,343,190	137,873	95,702	12,787
Present Value of 10-Yr Costs, \$	114,000	1,521,586	1,956,325	722,000	14,265,303	37,626,893	1,239,084	1,147,800	144,133
<b>Steps 1+2 Cost Eff, \$ per ton pollutants</b>	<b>28,795</b>	<b>4,667</b>	<b>6,595</b>	<b>246</b>	<b>3,246</b>	<b>4,271</b>	<b>14,236</b>	<b>23,308</b>	<b>8,605</b>
<b>Alternative Technology</b>	Electrify	Electrify	Electrify	Electrify	Electrify	Electrify	Electrify	Electrify	Electrify
DG Engines (Survey)	6	6	6	18	16	105	16	0	1
DG Engines (Total Population)	6	7	6	25	22	142	22	0	1
DG Engines--Avg. HP	2213	368	853	1773	771	302	2144		898
Non-DG Engines (Total Population)		7	12	13	31	141		3	0
Non-DG Engines--Avg. HP		701	290	1497	677	270		880	
<b>DG Engines:</b>									
(NOx+VOC+CO/7) Reduction, 10-Yr Tons	3,539	580	3,555	2,522	2,189	5,533	1,210		48
Initial Cost, \$	2,499,977	580,251	1,023,792	4,326,469	1,613,478	3,196,932	4,740,122		40,658
Annual O&M Cost, \$	-916,897	-15,087	-1,046,832	1,867,548	521,385	2,530,364	1,987,838		52,050
Present Value of 10-Yr Costs, \$	-5,238,633	452,916	-7,811,466	20,088,575	6,013,967	24,553,200	21,517,478		479,959

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	19	20	21	
Fuel	NATURAL GAS	NATURAL GAS	NATURAL GAS	
RECLAIM?	NON- RECLAIM	NON- RECLAIM	NON- RECLAIM	
BACT?	NON-BACT	NON-BACT	NON-BACT	
Rich-Burn or Lean-Burn?	RICH	RICH	RICH	
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	TOTALS
<b><u>Step 2: Reduce Emissions to NOx/CO/VOC = 11/250/30 ppm @ 15% O2</u></b>	Upgrade Three-Way Catalyst	Upgrade Three-Way Catalyst	Upgrade Three-Way Catalyst	
Initial Cost, \$	262,248	526,200	3,860,550	68,977,804
Annual O&M Cost, \$	79,996	154,200	1,048,350	10,974,451
Present Value of 10-Yr Costs, \$	937,414	1,827,648	12,708,624	161,602,173
<b>Step 2 Cost Eff, \$ per ton pollutants</b>	<b>1,539</b>	<b>1,654</b>	<b>2,022</b>	<b>8,337</b>
Steps 1+ 2 Total Initial Cost, \$	395,248	2,081,123	4,632,044	80,338,951
Steps 1+ 2 Total Annual O&M Cost, \$	79,996	571,635	4,501,416	22,662,342
Present Value of 10-Yr Costs, \$	1,070,414	6,905,718	42,623,998	271,609,118
<b>Steps 1+2 Cost Eff, \$ per ton pollutants</b>	<b>828</b>	<b>1,931</b>	<b>3,031</b>	<b>5,410</b>
<b><u>Alternative Technology</u></b>	Electrify	Electrify	Electrify	
DG Engines (Survey)	5	3	14	
DG Engines (Total Population)	7	4	19	284
DG Engines--Avg. HP	1172	930	257	
Non-DG Engines (Total Population)		16	206	509
Non-DG Engines--Avg. HP		598	248	
<b><u>DG Engines:</u></b>				
(NOx+VOC+CO/7) Reduction, 10-Yr Tons	1,584	1,133	1,487	28,550
Initial Cost, \$	744,245	350,598	430,130	26,053,243
Annual O&M Cost, \$	344,681	219,008	287,903	6,431,390
Present Value of 10-Yr Costs, \$	3,653,351	2,199,029	2,860,031	80,334,172

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	1	2	3	4	5	6	7	8	9
Fuel	BIOGAS	BIOGAS	BIOGAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	DIESEL	NATURAL GAS
RECLAIM?				RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM	RECLAIM
BACT?				BACT	BACT	NON-BACT	NON-BACT	BACT	NON-BACT
Rich-Burn or Lean-Burn?				RICH	RICH	RICH	RICH	LEAN	LEAN
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	MAJOR	NON-MAJOR	MAJOR	NON-MAJOR	NON-MAJOR	MAJOR
<b>Electrify DG Eng's Cost Eff, \$ per ton</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>1,922</b>	<b>2,397</b>	<b>397</b>	<b>5,418</b>	<b>-464</b>
<b>Non-DG Engines:</b>									
(NOx+VOC+CO/7) Reduction, 10-Yr Tons				116	897		3,371		20,469
Initial Cost, \$				458,019	1,684,405		4,437,908		17,418,616
Annual O&M Cost, \$				9,429	-85,082		-442,620		-5,469,589
Present Value of 10-Yr Costs, \$				537,601	966,316		702,199		-28,744,718
<b>Electrify Non-DG Eng's Cost Eff, \$ per ton</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>4,628</b>	<b>1,078</b>	<b>NA</b>	<b>208</b>	<b>NA</b>	<b>-1,404</b>
<b>Incremental Analysis (DG Engines):</b>									
Incremental (NOx+VOC+CO/7) Reduction, 10-Yr Tons					692	64	826	1,486	631
Incremental Present Value of 10-Yr Costs, \$					994,877	976,473	-652,375	7,872,163	-502,378
<b>Electrify DG Eng's Incremental Cost Eff, \$ per ton</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>1,438</b>	<b>15,254</b>	<b>-790</b>	<b>5,299</b>	<b>-797</b>
<b>Incremental Analysis (Non-DG Engines):</b>									
Incremental (NOx+VOC+CO/7) Reduction, 10-Yr Tons				25	548		2,108		16,757
Incremental Present Value of 10-Yr Costs, \$				518,601	-496,213		-6,764,308		-33,080,749
<b>Electrify Non-DG Incremental Cost Eff, \$ per ton</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>21,089</b>	<b>-905</b>	<b>NA</b>	<b>-3,209</b>	<b>NA</b>	<b>-1,974</b>

**Table C-5 (Continued)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	10	11	12	13	14	15	16	17	18
Fuel	DIESEL	NATURAL GAS	DIESEL	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS	NATURAL GAS
RECLAIM?	RECLAIM	RECLAIM	RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM	NON-RECLAIM
BACT?	NON-BACT	NON-BACT	NON-BACT	BACT	BACT	BACT	BACT	BACT	BACT
Rich-Burn or Lean-Burn?	LEAN	LEAN	LEAN	RICH	RICH	RICH	LEAN	LEAN	LEAN
=>1000 HP or NOx-Major?	MAJOR	NON-MAJOR	NON-MAJOR	=>1000	<1000	<1000	=>1000	<1000	<1000
<b>Electrify DG Eng's Cost Eff, \$ per ton</b>	<b>-1,480</b>	<b>780</b>	<b>-2,197</b>	<b>7,966</b>	<b>2,747</b>	<b>4,437</b>	<b>17,782</b>	<b>NA</b>	<b>10,053</b>
<b>Non-DG Engines:</b>									
(NOx+VOC+CO/7) Reduction, 10-Yr Tons		1,116	2,417	1,148	2,753	4,993		146	
Initial Cost, \$		1,418,420	1,438,257	2,876,654	3,888,630	10,216,339		308,610	
Annual O&M Cost, \$		-192,987	-827,642	169,588	539,101	975,075		66,719	
Present Value of 10-Yr Costs, \$		-210,392	-5,547,039	4,307,976	8,438,646	18,445,971		871,722	
<b>Electrify Non-DG Eng's Cost Eff, \$ per ton</b>	<b>NA</b>	<b>-189</b>	<b>-2,295</b>	<b>3,751</b>	<b>3,065</b>	<b>3,694</b>	<b>NA</b>	<b>5,972</b>	<b>NA</b>
<b>Incremental Analysis (DG Engines):</b>									
Incremental (NOx+VOC+CO/7) Reduction, 10-Yr Tons	3,536	468	3,378	486	225	866	1,123		31
Incremental Present Value of 10-Yr Costs, \$	-5,352,633	-307,877	-8,463,575	19,613,575	92,520	5,673,275	20,278,394		335,827
<b>Electrify DG Eng's Incremental Cost Eff, \$ per ton</b>	<b>-1,514</b>	<b>-658</b>	<b>-2,505</b>	<b>40,389</b>	<b>412</b>	<b>6,549</b>	<b>18,057</b>	<b>NA</b>	<b>10,836</b>
<b>Incremental Analysis (Non-DG Engines):</b>									
Incremental (NOx+VOC+CO/7) Reduction, 10-Yr Tons		902	2,297	255	323	850		97	
Incremental Present Value of 10-Yr Costs, \$		-971,185	-6,851,256	4,060,976	94,790	-300,997		-276,078	
<b>Electrify Non-DG Incremental Cost Eff, \$ per ton</b>	<b>NA</b>	<b>-1,077</b>	<b>-2,983</b>	<b>15,955</b>	<b>294</b>	<b>-354</b>	<b>NA</b>	<b>-2,854</b>	<b>NA</b>

**Table C-5(Concluded)**  
**PAR 1110.2 Cost Effectiveness Calculations**

	19	20	21	
Fuel	NATURAL GAS	NATURAL GAS	NATURAL GAS	
RECLAIM?	NON- RECLAIM	NON- RECLAIM	NON- RECLAIM	
BACT?	NON-BACT	NON-BACT	NON-BACT	
Rich-Burn or Lean-Burn?	RICH	RICH	RICH	
=>1000 HP or NOx-Major?	=>1000	<1000	<1000	TOTALS
<b>Electrify DG Eng's Cost Eff, \$ per ton</b>	<b>2,307</b>	<b>1,941</b>	<b>1,923</b>	<b>2,814</b>
<b><u>Non-DG Engines:</u></b>				
(NOx+VOC+CO/7) Reduction, 10-Yr Tons		2,934	15,669	56,030
Initial Cost, \$		1,915,837	14,931,788	60,993,484
Annual O&M Cost, \$		245,313	1,309,040	-3,703,654
Present Value of 10-Yr Costs, \$		3,986,276	25,980,081	29,734,641
<b>Electrify Non-DG Eng's Cost Eff, \$ per ton</b>	<b>NA</b>	<b>1,358</b>	<b>1,658</b>	<b>531</b>
<b><u>Incremental Analysis (DG Engines):</u></b>				
Incremental (NOx+VOC+CO/7) Reduction, 10-Yr Tons	291	132	260	
Incremental Present Value of 10-Yr Costs, \$	2,582,937	817,886	-739,329	
<b>Electrify DG Eng's Incremental Cost Eff, \$ per ton</b>	<b>8,882</b>	<b>6,196</b>	<b>-2,839</b>	
<b><u>Incremental Analysis (Non-DG Engines):</u></b>				
Incremental (NOx+VOC+CO/7) Reduction, 10-Yr Tons		360	2,833	
Incremental Present Value of 10-Yr Costs, \$		-1,538,299	-13,044,557	
<b>Electrify Non-DG Incremental Cost Eff, \$ per ton</b>	<b>NA</b>	<b>-4,275</b>	<b>-4,605</b>	

**PAR 1110.2 Cost Effectiveness Calculations - Preliminary Draft --Notes2****GENERAL:**

Cost calculations assume 8000 hrs per year engine operation at full capacity and 31% engine efficiency (HHV).

Results of an engine survey were scaled up to represent total-population estimates based on a 73.5% response rate to the survey (based on number of engines).

**Scaling Factors**

Biogas engines:	Represented in Calc's =	54	Number found in BCAT search =	66	Factor =	0.818
RECLAIM nat gas engines:	Represented in Calc's =	90	Number found in BCAT search =	111	Factor =	0.811
Other nat gas engines:	Represented in Calc's =	481	Number found in BCAT search =	652	Factor =	0.738
Diesel engines:	Represented in Calc's =	30	Number found in BCAT search =	30	Factor =	1.000
		<u>655</u>		<u>859</u>		

The ten-year present-value calculation assumes a 4% real interest rate (prevailing interest rate less rate of inflation).

For purposes of these calculations, no distinction is made between engines fueled on natural gas, propane or field gas--all are included in "Natural Gas".

**NOx, CO and VOC CONCENTRATIONS (Note Concentrations Summary Table at end of this section):****Baseline Emissions****Biogas Engines**

Baseline emissions are based on horsepower-weighted averages of NOx limits, landfill gas VOC limits (40 ppm @ 15% O2 as methane), average VOC source test results for digester gas engines based on the survey data, and average CO source test results based on the survey data. In all cases except CEMS-monitored NOx, baseline emissions are assumed to be, on average, 10% above those limits or source test results.

**Rich-Burn Engines**

For non-RECLAIM and RECLAIM BACT engines with NOx CEMS, it is assumed that the NOx level is maintained on average at 80% of the NOx limit.

For RECLAIM Majors, it is assumed that the NOx level is at the apparent "limit", which was calculated from annual emissions reporting data.

For most rich-burn engines, baseline NOx and CO emissions are based on horsepower-weighted average NOx and CO limits multiplied by factors that are based on AQMD compliance test results.

AQMD compliance tests showed that for engines without CEMS, the average ratio of measured NOx to the NOx limit is 5.19 for BACT engines (NOx limit in 8-23 range) and 2.12 for non-BACT engines (NOx limit in 36-59 range).

AQMD compliance tests showed that the average ratio of measured CO to the CO limit follows the relationship  $R-CO = 6.75 - .00306 \times (L - 75)$ , where R-CO = ratio of measured CO to CO limit and L = CO limit, ppmvd @ 15% O2.

If measured CO were capped at 1.2 x L or 0.8 x L, the relationships would have been  $R-CO(1.2) = 0.590 - .000936 \times (L - 75)$  or  $R-CO(0.8) = 0.460 - .000807 \times (L - 75)$

For non-BACT engines in RECLAIM, many NOx limits are above the range of the AQMD compliance data (none tested in this category), and it is assumed that baseline NOx for non-Major sources (no CEMS) in this group is maintained, on average, at the horsepower-weighted NOx limit.

Although compliance testing did not include VOC data, source test data reported in the engine survey showed that VOC levels tend to correspond to roughly the square root of the CO level. The following equations were developed (ppm-15% O2): for non-BACT engines  $VOC = 1.1 \times \text{sq rt} (CO)$  and for BACT engines  $VOC = 0.93 \times \text{sq rt} (CO)$ .

**Lean-Burn Engines (Excluding Biogas Engines)**

Non-BACT engines (all in RECLAIM): Non-CEMS NOx assumed to be at limit on average, and CO and VOC assumed 10% over source test results on average. For RECLAIM Majors, the NOx level is assumed to be maintained at the reported limit or apparent limit that was calculated based on annual emission reporting.

BACT, non-RECLAIM engines: non-CEMS NOx assumed 1.8 x the NOx limit based on AQMD compliance test results; CO and VOC assumed 10% above average source test results.

BACT RECLAIM engines (Snow Summit diesels, 50 ppm NOx limit, no CEMS): NOx, CO and VOC assumed to be 10% over limits on average.

### **Controlled Emissions (Step 1)**

Step 1 is the increased monitoring requirements that take effect in 2008.

Lean-burn engines: Expected to operate at BACT limits or, in absence of BACT limit, at average source test results.

Rich-burn engines that will have NOx/CO CEMS: it is assumed that both NOx and CO will be maintained on average at 80% of their respective limits.

Rich-burn engines subject to Inspection & Monitoring Plans: it is assumed that both NOx and CO will be, on average, no greater than 20% above their respective limits.

### **Controlled Emissions (Step 2)**

Step 2 is reduction to NOx/CO/VOC = 11/250/30 ppm @ 15% O<sub>2</sub>, taking effect in 2010 - 2012.

Engines with BACT limits will be unaffected, and engines in RECLAIM will be unaffected regarding NOx.

Engines that will have NOx and/or CO CEMS: it is assumed that the monitored pollutant(s) will be maintained on average at 80% of their respective limits.

Engines subject to Inspection & Monitoring Plans:

Rich-burn:

Lean-burn:



**Concentrations Summary Table:**

	Baseline			Step 1			Step 2			Fuel
	NOx	CO	VOC	NOx	CO	VOC	NOx	CO	VOC	
Biogas >=1000	0.8 x L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	0.8 x 11	250 or S/T	CO% or 30	Biogas
Biogas <1000, New CEMS	1.1 x L	1.1 x S/T	1.1 x S/T	0.8 x L	S/T	S/T	0.8 x 11	250 or S/T	CO% or 30	Biogas
Biogas <1000, I&M	1.1 x L	1.1 x S/T	1.1 x S/T	L	S/T	S/T	11	250 or S/T	CO% or 30	Biogas
Rich BACT RECL Major	0.8 x L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	same	same	f(CO) or 30	NG
Rich BACT RECL Non-Major	f(L)	f(L)	f(CO)	same	f(L)-1.2	f(CO)	same	same	f(CO) or 30	NG
Rich Non-BACT RECL Major	L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	same	0.8 x 250 or same	f(CO) or 30	NG
Rich Non-BACT RECL Non-Major	L	f(L)	f(CO)	same	f(L)-1.2	f(CO)	same	1.2 x 250 or same	f(CO) or 30	NG
Lean BACT RECL Non-Major Dsl	1.1 x L	1.1 x L	1.1 x L	same	L	L	same	same	same or 30	Dsl
Lean Non-BACT RECL Major	L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	same	250 or S/T	CO% or 30	NG
Lean Non-BACT RECL Major Dsl	L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	same	250 or S/T	CO% or 30	Dsl
Lean Non-BACT RECL Non-Major	L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	same	250 or S/T	CO% or 30	NG
Lean Non-BACT RECL Non-Maj Dsl	L	1.1 x S/T	1.1 x S/T	same	S/T	S/T	same	250 or S/T	CO% or 30	Dsl
Rich BACT >=1000	0.8 x L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	0.8 x (11 or L)	0.8 x (250 or L)	f(CO) or 30	NG
Rich BACT <1000, New CEMS	f(L)	f(L)	f(CO)	0.8 x L	f(L)-0.8	f(CO)	0.8 x (11 or L)	0.8 x (250 or L)	f(CO) or 30	NG
Rich BACT <1000, I&M	f(L)	f(L)	f(CO)	1.2 x L	f(L)-1.2	f(CO)	1.2 x (11 or L)	1.2 x (250 or L)	f(CO) or 30	NG
Lean BACT >=1000	0.8 x L	1.1 x L	1.1 x L	same	L	L	same	same	same or 30	NG
Lean BACT <1000, New CEMS	1.8 x L	1.1 x L	1.1 x L	L	L	L	same	same	same or 30	NG
Lean BACT <1000, I&M	1.8 x L	1.1 x L	1.1 x L	L	L	L	same	same	same or 30	NG
Rich Non-BACT >=1000	0.8 x L	f(L)	f(CO)	same	f(L)-0.8	f(CO)	0.8 x 11	0.8 x 250	f(CO) or 30	NG
Rich Non-BACT <1000, New CEMS	f(L)	f(L)	f(CO)	0.8 x L	f(L)-0.8	f(CO)	0.8 x 11	0.8 x 250	f(CO) or 30	NG
Rich Non-BACT <1000, I&M	f(L)	f(L)	f(CO)	1.2 x L	f(L)-1.2	f(CO)	1.2 x 11	1.2 x 250	f(CO) or 30	NG

Notes:

**NOx, CO, VOC TPY CALCULATIONS:**

Natural gas: NOx factor is based on 80 ppm NOx @ 3% O2 = 1 lb per MMBtu fuel input (as NO2). For CO, 80 ppm factor becomes 80 x 46 (mol-wt. NO2) / 28 (mol-wt. CO). For VOC (as methane), 80 ppm factor becomes 80 x 46 / 16 (mol-wt. CH4)

Diesel: 80 ppm factor becomes 80 x 8710 (EPA Method 19 dry gas factor for natural gas) / 9190 (EPA Method 19 dry gas factor for diesel).

Biogas: 80 ppm factor becomes 80 x 0.97 to correct for typical 50% CO2 in biogas (resulting in approx. 3% added flue gas volume at 15% O2).

**CONTROL COSTS:****Add CO analyzer to existing CEMS**

The cost of a CO analyzer (\$8,000 to \$11,000) was obtained from a CEMS vendor. The cost of installation and reprogramming the DAS is estimated to be about \$8000. The impact on span gas costs is expected to be minimal since CO can be added to the NOx span gases at little additional cost. The impact on RATA tests is expected to be minimal.

Total Est. Cost

**Install New NOx-CO CEMS**

The installed cost and annual cost of a NOx-CO CEMS were obtained from a vendor specializing in that equipment.

	Rich-Burn		Lean-Burn	
	Initial Costs, \$	Annual Costs, \$	Initial Costs, \$	Annual Costs, \$
CEMS--NOx/CO for rich-burn engines, NOx-only for lean-burn engines	86,000		78,000	
Switching Valve	5,000		5,000	
Data Acquisition System	25,000		25,000	
Installation	20,000		20,000	
Certification Testing	10,000		10,000	
Startup and Training	25,000		25,000	
Project Management	5,600		5,600	
AQMD Fees	4,000		4,000	
Span Gases		10,000		10,000
RATA		10,000		10,000
Maintenance		15,000		15,000
	180,600	35,000	172,600	35,000
Additional costs for sharing (per engine, AQMD estimates)				
Additional sampling system	15,000		15,000	
Additional installation	10,000		10,000	
Additional DAS programming	5,000		5,000	

Concluded

	Initial Costs, \$	Annual Costs, \$	Rich-Burn Initial Costs, \$	Lean-Burn Annual Costs, \$
Additional certification testing	5,000		5,000	
Additional span gases		2,500		2,500
Additional RATA		5,000		5,000
Additional Maintenance		7,500		7,500
	35,000	15,000	35,000	15,000

**Install air/fuel ratio controller on a lean burn engine**

The installed and operating cost of an air/fuel ratio controller was obtained from a vendor specializing in that equipment.

Installed Cost, \$

Operating Cost quarterly changeout of O2 sensor(s)-two sensors @ \$90, \$/yr

**Increased Source Testing and I&M Requirements for Non-CEMS Engines**

	Initial Costs, \$	Rich-burn	Lean-burn	Lean-burn RECLAIM or w NOx CEMS
Increase source test frequency from every 3 yrs to every 15 months (conservative, for case of highly utilized engine)		1,400	1,400	1,400
AQMD Protocol and Report Evaluation Fees (\$278.57 x 2 every 15 mo.)		446	446	446
Source test protocol with every source test (enr labor: 8-hrs initially, then 1 hr every 15 mo., @ \$55/hr)	440	28	28	28
I&M Plan (24 hrs engr @ \$55)	1,320			
AQMD Plan Evaluation Fee	209			
Initial Parametric Test (\$300 test + extra 6 hrs @ \$70, 2 hrs engr @ \$55, 8 hrs tech @ \$35)	1,220			
Alarm (\$100 to purchase annunciator + 4 hrs tech @ \$35 to install [AFRC assumed to have output for alarm])	240			
Emission Checks: most engines w/o NOx/CO CEMS--weekly/monthly--18 tests per year @ \$300 per test		5,400	5,400	
Lean-burn engines in RECLAIM or with NOx CEMS--4 tests per year @ \$300 per test				1,200
Daily inspections (0.25 hr tech time @ \$35)		3,194	3,194	3,194
Repeat parametric test whenever O2 sensor is changed (quarterly)		4,880		
	3,429	15,347	10,467	6,267

**Install fuel cleanup system, SCR system and oxidation catalyst on biogas-fired engine**

	<u>2682 hp</u>		<u>625 hp</u>		<u>Non-Biogas Engine</u> <u>183 hp</u>	
	<u>Initial Costs, \$</u>	<u>Annual Costs, \$</u>	<u>Initial Costs, \$</u>	<u>Annual Costs, \$</u>	<u>Initial Costs, \$</u>	<u>Annual Costs, \$</u>
Biogas cleanup (siloxane removal) system installed cost, \$	353,782		115,926			
Sorbent disposal and replacement, \$/yr		73,982		17,240		
Periodic sorbent test		10,000		10,000		
Selective catalytic reduction system installed cost, \$	311,257		114,611		43,229	
Startup	10,549		10,549		10,549	
Contingency (10%)	31,126		11,461		4,323	
Total	352,932		136,622		58,101	
Replace catalyst every 3 years		51,876		19,102		7,205
Cost of urea @ \$300/ton NH3, \$/yr		732		171		50
Oxidation catalyst installed cost,\$	29,279		10,562		6,431	
Replace catalyst every 3 years		4,880		1,760		1,072
Cost of parasitic load on engine, \$/yr		4,031		939		275
Project management- 160 hrs @ \$55	8,800		8,800		8,800	
AQMD application fee	2,300		2,300		2,300	
Performance test	4,000		4,000		4,000	
Annual maintenance cost @ 3% of original equipment cost, \$/yr		20,830		7,233		1,490
	<u>1,104,025</u>	<u>166,330</u>	<u>414,832</u>	<u>56,445</u>	<u>137,733</u>	<u>10,091</u>

Installed cost and annual cost for a biogas cleanup system was obtained from a vendor specializing in that equipment.

Installed cost = \$1,000,000 x (HP/10,413)<sup>0.766</sup>; 850 scfm biogas uses 3400 lb/mo. sorbent @ \$1.68/lb disposal and replacement cost plus \$10k annual cost of periodic sorbent testing.

The SCR system costs were obtained from a vendor specializing in that equipment--see AQMD staff report

"Proposed Amended Best Available Control Technology (BACT) Guidelines, Part D- Non-Major Polluting Facilities, Regarding Emergency Compression-ignition (Diesel) Engines", April 2003, Appendix H (escalated to 2008 \$ @ 3% per year).

The oxidation catalyst installed cost was obtained from a vendor specializing in that equipment.

Parasitic load is estimated to be 0.236% based on 3" H2O pressure loss through the fuel cleanup system and 3" H2O pressure loss through the SCR and oxidation catalysts. Cost is based on purchase of replacement power at \$.0796/kWh.

<b>Upgrade three-way catalyst to meet 11 ppm NOx</b>		<u>2068 hp</u>	<u>1172 hp</u>	<u>665 hp</u>	<u>568 hp</u>	<u>333 hp</u>	<u>249 hp</u>
New catalyst (Installed) (vendor figure)		53,996	34,284	23,130	20,996	15,826	13,978
Project management (16 hrs @ \$55)		880	880	880	880	880	880
AQMD application fee		2,300	2,300	2,300	2,300	2,300	2,300
<b>Total</b>		<b>57,176</b>	<b>37,464</b>	<b>26,310</b>	<b>24,176</b>	<b>19,006</b>	<b>17,158</b>
Annual O&M Cost	Replace catalyst every 3 years	17,999	11,428	7,710	6,999	5,275	4,659

<b>Install oxidation catalyst to meet 30 ppm VOC and 250 ppm CO</b>		<u>3265 hp</u>	<u>341 hp</u>
Oxidation catalyst (Installed) (vendor figure + 10% for modifications to ductwork)		35,332	9,601
Project management (16 hrs @ \$55)		880	880
AQMD application fee		2,300	2,300
<b>Total</b>		<b>38,512</b>	<b>12,781</b>
Annual O&M Cost	Replace catalyst every 3 years	5,889	1,600

<b>Eliminate DG engine or replace work engine with electric motor (1000 hp engine)</b>	<u>CEMS Engine</u>			
	<u>Remove (DG)</u>	<u>Replace (Non-DG)</u>	<u>Remove (DG)</u>	<u>Replace (Non-DG)</u>
Engine removal (vendor figure) \$5,000-\$25,000 depends on accessibility	15,000	15,000		
Electric motor (www.automationdirect.com) \$7100 @ 200hp, scale with capacity^0.73, includes 8% tax		22,988		
Motor controls and switchgear (AQMD estimate)		10,000		
Installation (vendor figure - about 2X removal cost)		30,000		
Backup generator @ \$250/kW	180,905	180,905		
Project management (24 hrs to remove only, 56 hrs to remove and replace @ \$55)	1,320	3,080		
	<b>197,225</b>	<b>261,973</b>		
Increased utility demand charge (SCE TOU-8 rate schedule--\$194/kW-Yr), \$/Yr	140,382	149,200	140,382	149,200
Cost of power (SCE TOU-8 rate schedule--\$.0796/kWh ann. avg.), \$/Yr	460,801	489,745	460,801	489,745
Avoided cost of fuel @ \$0.81 per therm, source/RATA testing and CEMS maintenance, \$/Yr	-461,867	-532,987	-478,867	-549,987
Maintenance cost differential--\$.01 per hp-hr for ICE vs. negligible cost for motor, \$/Yr	-80,000	-80,000	-80,000	-80,000
<a href="http://www.distributed-generation.com/Library/PLL%20AEIC.PDF">http://www.distributed-generation.com/Library/PLL%20AEIC.PDF</a>	59,316	25,958	42,316	8,958

Power and fuel calculations assume 31% engine efficiency, 97% motor/generator efficiency, 8000 hrs per year operation.

Emissions from central power plant assumed to be 0.335 CO and .027 VOC (lb/MWh) based on annual emissions reporting. It is also assumed that 80% of marginal grid power is natural gas-based (state law requires grid power to be 20% from renewable sources starting 2010).

	CEMS Engine			
	<u>Remove (DG)</u>	<u>Replace (Non-DG)</u>	<u>Remove (DG)</u>	<u>Replace (Non-DG)</u>
<b><u>Eliminate DG engine or replace work engine with electric motor (1000 hp engine) (Concluded)</u></b>				
It is assumed that removal of a natural gas distributed-generation engine increases boiler fuel by $(1-0.31) \times 0.5 / 0.8 \times$ the engine fuel consumption (50% waste heat utilization, 80% boiler efficiency). Increased emissions from boiler are calculated at 30 ppm NO <sub>x</sub> and 100 ppm CO, both @ 3% O <sub>2</sub> (.0375 and .076 lb/MMBtu, respectively).				
Avoided source testing or RATA testing assumes testing triennially @ \$3000 for non-CEMS engine and annual testing for CEMS engine.				
Avoided CEMS maintenance is \$15,000 annual cost.				
Annual costs include credit for avoided permit and emission fees @ \$955/yr permit fee (or \$293 if <500 hp) and \$200/ton NO <sub>x</sub> .				
Costs include credits for emission reduction credits (ERC) @ \$95,000 per TPY NO <sub>x</sub> (except in RECLAIM).				
Costs for engines in RECLAIM include an annual credit for Reclaim Trading Credits (RTC) @ \$4,000 per ton NO <sub>x</sub> .				

**Upgrade Biogas to PUC-Quality Pipeline Gas (Replacement of 4860 HP Engine)**

	<u>Landfill Gas (DG)</u>	<u>Digester Gas (DG)</u>	<u>Dig. Gas (Non-DG)</u>
Installed Cost, \$ (2008)	2,680,000	2,680,000	2,680,000
O&M Cost, \$/yr (2008)	410,000	410,000	410,000
Value of PUC gas produced less gas needed for boilers (digester-DG case only), \$/yr	1,598,400	760,050	1,598,400
Cost of power production foregone (landfill) or increased power purchase (digester), \$/yr	1,026,904	1,026,904	
Cost of engine removal and motor installation, \$			58,080
Cost of electric motors and backup generators, \$			979,294
Cost of increased demand charge @ \$194/kW-yr and purchased power @ \$.0796/kWh, \$/yr			3,105,273
ICE maintenance, \$/yr	-388,800	-388,800	-388,800
CO emissions from increased grid power, tpy	4.36E+00	4.36E+00	4.60E+00
VOC emissions from increased grid power, tpy	3.52E-01	3.52E-01	3.71E-01
NO <sub>x</sub> emissions from thermal oxidizer, tpy	9.90E-01	9.90E-01	9.90E-01

In digester gas non-DG case, engines are being used to drive compressors. Electrification costs--see above, "replace work engine with electric motor".

Cost and technical information for a biogas upgrade plant were taken from "An Economic Evaluation of Carbon Molecular Sieve Membranes in Landfill Gas Applications", GC Environmental Inc., Media and Process Technology Inc., USC Dept. of Chemical Engineering, Copyright 1999-GC Environmental.

Basis: replacement of a 4860 hp biogas engine using 90,000 scfh biogas @ 45% methane, yielding 33.3 MMBtu/hr PUC gas and 6.6 MMBTU/hr waste gas to thermal oxidizer.

Value of PUC gas calculated at \$0.6 per therm (recent wholesale price - US EIA data).

Value of power production foregone (landfill case) calculated at \$.0365 per kWh (based on US EIA data for 1999 escalated to 2008 \$ @ 3% inflation rate), and value of increased power

purchase (digester case) calculated at \$.0796 per kWh. Value of avoided engine maintenance calculated at \$.01 per hp-hr.

Power plant emissions based on power needed to compress biogas to 400 psi (554 kW) and to replace power produced by engines,

@ 0.335 and .027 lb/MWh CO and VOC, resp., from central power plant (NO<sub>x</sub> capped by RECLAIM), 80% of marginal grid power produced by natural gas plants.

Thermal oxidizer NO<sub>x</sub> emission calculated based on 30 ppm NO<sub>x</sub> @ 3% O<sub>2</sub>.

Possible tax credit (IRS Section 29) not included in this analysis.

**Fuel Cell Power Plant for Digester Gas**

	<u>Digester Gas (DG)</u>	<u>Dig. Gas (Non-DG)</u>
Average Plant Size, HP	4396	652
ICE kW	3,181	472
Maximum Fuel Cell kW	4,230	627
Fuel Cell Plant Size, kW	4,200	600
Fuel Cell Output, kW	4,200	600
Installed Cost of Fuel Cell Power Plant @ \$7000/kW, \$	29,400,000	1,500,000
Maintenance (including restacks) @ \$.04/kWh, \$/yr	1,344,000	192,000
ICE maintenance @ \$.01/hp-hr, \$/yr	-351,680	-52,160
Cost of electrification, \$		196,501
Cost of increased demand charge @ \$194/kW-yr and purchased power @ \$.0796/kWh, \$/yr	-846,557	-81,888
Increased natural gas to boilers @ 50% waste heat utilization and 80% boiler efficiency, MMBtu/yr	16,240	
Cost of increased natural gas to boilers @ \$0.81/therm, \$/yr	131,547	
CO emissions from grid power increase, tpy	-1.43E-01	-1.38E-02
VOC emissions from grid power increase, tpy	-4.08E-02	-3.94E-03
NOx emissions from fuel cell @ .0017 lb/MWh, tpy	2.86E-02	4.08E-03
VOC emissions from fuel cell @ .007 lb/MWh, tpy	1.18E-01	1.68E-02
NOx emissions from increased boiler fuel @ 30 ppm @ 3% O <sub>2</sub> , tpy	3.05E-01	

In digester gas non-DG case, engines are being used to drive compressors. Electrification costs--see above, "replace work engine with electric motor".

Costs are for multiple Fuel Cell Energy DFC300MA 300-kW units--plant size based on 31% ICE efficiency, 97% generator efficiency and 40% fuel cell efficiency (average between restacks) (all HHV). Self-Generation Incentive Program provides \$4.50 per Watt for new fuel cell biogas generation (applies to Non-DG case).

Plant size based on 31% ICE efficiency, 97% generator efficiency and 40% fuel cell efficiency (average between restacks) (all HHV).

Emissions from grid power are calculated at 0.335 lb/MWh CO and .027 lb/MWh VOC (NOx capped by RECLAIM) and 80% of marginal grid power produced from natural gas plants.

Fuel cell emissions are based on source test results on DFC300MA installation at Palmdale, CA.

**Microturbine-Generator Biogas Power Plant**

	<u>Landfill Gas (DG)</u>	<u>Digester Gas (DG)</u>	<u>Dig. Gas (Non- DG)</u>
Average Plant Size, HP	6,560	4,396	652
ICE kW	4,747	3,181	472
Maximum MTG kW	4,103	2,749	408
MTG Plant Size, kW	4,160	2,795	455
MTG Plant Output, kW	4,103	2,749	408
Installed Cost, \$	8,699,466	7,594,551	455,092
Maintenance @ \$.01/kWh, \$/yr	328,214	219,943	32,621
ICE maintenance @ \$.01/hp-hr, \$/yr	-524,800	-351,680	-52,160
Cost of electrification, \$			64,903
Cost of increased demand charge @ \$194/kW-yr and purchased power @ \$.088/kWh, \$/yr	535,262	358,691	77,820
Increased natural gas to boilers @ 50% waste heat utilization and 80% boiler efficiency, MMBtu/yr		-9,022	
Cost of increased natural gas to boilers @ \$0.81/therm, \$/yr		-73,082	
CO emissions from grid power increase, tpy	6.91E-01	4.63E-01	6.86E-02
VOC emissions from grid power increase, tpy	5.57E-02	3.73E-02	5.53E-03
NOx emissions from MTGs @ 9 ppm @ 15% O <sub>2</sub> , tpy	7.27E+00	4.87E+00	7.23E-01
VOC emissions from MTGs @ 20 ppm @ 3% O <sub>2</sub> (as hexane), tpy	1.12E+01	7.53E+00	1.12E+00
NOx emissions from increased boiler fuel @ 30 ppm @ 3% O <sub>2</sub> , tpy		-1.69E-01	

In digester gas non-DG case, engines are being used to drive compressors. Electrification costs--see above, "replace work engine with electric motor".

Costs are for multiple Capstone 65-kW microturbine-generators (MTGs), incl fuel kits and siloxane-removal skid.

Plant size based on 31% ICE efficiency, 97% generator efficiency and 26% MTG efficiency (all HHV).

MTG cost is \$67,000 w/o heat exch. or \$80,000 w/ heat exch (digester DG case). Self-Generation Incentive Program provides \$1.30 per Watt of new kW (applies to non-DG case).

Installation cost is \$35,800 per unit w/o waste heat recovery system, \$57,000 per unit w/ waste heat recovery system ("AQMD Microturbine Generator Site Summary Report",

UCI Advanced Power & Energy Program, May 5, 2004) escalated to 2008 \$ @ 3% inflation rate.

Cost of gas conditioning skid (information from vendor) is \$550/kW @ 500 kW size, \$300/kW @ 5 MW size.

Emissions from grid power are calculated at 0.335 lb/MWh CO and .027 lb/MWh VOC (NO<sub>x</sub> capped by RECLAIM) and 80% of marginal grid power from natural gas plants.



**Solar Turbine Mercury 50 Digester Gas Power Plant**

	<u>ID 17301</u>	<u>ID 29110</u>
Plant Size, HP	10,413	20,830
ICE kW	7,535	15,073
Maximum Gas Turbine, gross kW	8,641	17,286
Gas Turbine Plant Size, gross kW	9,000	18,000
Gas Turbine Plant Output, kW	8,400	16,800
Installed Cost @ \$1200/kW, \$	10,800,000	21,600,000
Maintenance @ \$.01/kWh, \$/yr	691,313	1,382,892
ICE maintenance @ \$.01/hp-hr, \$/yr	-833,040	-1,666,400
Cost of increased demand charge @ \$194/kW-yr and purchased power @ \$.0796/kWh, \$/yr	-718,596	-1,434,788
Increased natural gas to boilers @ 50% waste heat utilization and 80% boiler efficiency, MMBtu/yr	-4,564	-9,390
Cost of increased natural gas to boilers @ \$0.81/therm, \$/yr	-36,965	-76,058
CO emissions from grid power increase, tpy	-9.27E-01	-1.85E+00
VOC emissions from grid power increase, tpy	-7.47E-02	-1.49E-01
NOx emissions from gas turbines @ 25 ppm @ 15% O <sub>2</sub> , tpy	4.25E+01	8.51E+01
VOC emissions from gas turbines @ 20 ppm @ 3% O <sub>2</sub> (as hexane), tpy	2.72E+01	4.74E+01
NOx emissions from increased boiler fuel @ 30 ppm @ 3% O <sub>2</sub> , tpy	-8.56E-02	-1.76E-01

Costs are for multiple Mercury 50 4.2 MW (net) gas turbine-generators, incl fuel compressor (300 psi), sound enclosure, siloxane-removal skid and switchgear.

Plant size based on 31% ICE efficiency, 97% generator efficiency and 34.5% gas turbine-generator gross electrical efficiency (all HHV).

Emissions from grid power are calculated at 0.335 lb/MWh CO and .027 lb/MWh VOC (NO<sub>x</sub> capped by RECLAIM) and 80% of marginal grid power from natural gas plants.

**Electrify Digester Gas-Fueled Compressor Engines**

Engine Size, HP	652
Cost of electrification, \$	196,501
Cost of increased demand charge @ \$194/kW-yr and purchased power @ \$.0796/kWh, \$/yr	416,592
ICE maintenance @ \$.01/hp-hr, \$/yr	-52,160
CO emissions from grid power increase, tpy	5.38E-01
VOC emissions from grid power increase, tpy	4.33E-02
NOx emissions from flaring @ .06 lb/MMBtu, tpy	1.28E+00
VOC emissions from flaring @ 10 ppm @ 3% O <sub>2</sub> (as methane), tpy	9.31E-02

Emissions from grid power are calculated at 0.335 lb/MWh CO and .027 lb/MWh VOC (NO<sub>x</sub> capped by RECLAIM) and 80% of marginal grid power from natural gas plants.

Flare emissions are based on NO<sub>x</sub> BACT and VOC source test data for biogas flares.

**Table C-6  
Affected Engines**

<b>Project - Engines</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>Total</b>
Increased Source Testing	473					<b>473</b>
Inspection & Monitoring	473					<b>473</b>
Install Sampling Infrastructure	503					<b>503</b>
Install AFRC		34				<b>34</b>
Upgrade Three-Way Catalyst			26	50		<b>76</b>
Install Oxidation Catalyst			20	9		<b>29</b>
Install CEMS - Engine Count		9	28	32		<b>69</b>
Install CEMS - CEMS Count		4	10	10		<b>24</b>
Install CO Analyzer			34	14		<b>48</b>
Install Pretreatment, SCR, Ox Cat or ICE Alternative Technology					66	<b>66</b>
Electrified Engines		9	33	128		<b>170</b>

**Table C-7  
Affected Facilities**

<b>Project - Facilities</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>Total</b>
Increased Source Testing	242					<b>242</b>
Inspection & Monitoring	242					<b>242</b>
Install Sampling Infrastructure	240					<b>240</b>
Install AFRC		16				<b>16</b>
Upgrade Three-Way Catalyst			15	30		<b>45</b>
Install Oxidation Catalyst			5	2		<b>7</b>
Install CEMS		4	10	10		<b>24</b>
Install CO Analyzer			15	5		<b>20</b>
Install Pretreatment, SCR, Ox Cat or ICE Alternative Technology					28	<b>28</b>
Facilities with Electrified Engines		4	13	88		<b>105</b>

Surveyed facilities are the number of facilities that were included in the surveys.

Total estimated facilities are the surveyed values scaled up to the total number of facilities in the district.

Facilities with electrified engines are the number of facilities that would replace existing non-biogas engines with electric motors instead of complying with PAR 1110.2.

**Table C-8  
2008 Vehicle Operational Emissions**

<b>Description</b>	<b>Annual No of Trips<sup>b</sup></b>	<b>Daily No of Trips<sup>b</sup></b>	<b>One-way Distance<sup>c</sup>, miles</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5<sup>d</sup>, lb/day</b>	<b>CO2, lb/year</b>
Source Test Related Trips	242	3	30	8.5	2.6	0.67	0.0071	0.42	0.40	61,303
<b>Total</b>				8.5	2.6	0.67	0.0071	0.42	0.40	61,303

**Table C-9  
2009 Vehicle Operational Emissions**

<b>Description</b>	<b>Annual No of Trips<sup>b</sup></b>	<b>Daily No of Trips<sup>b</sup></b>	<b>One-way Distance<sup>c</sup>, miles</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5<sup>d</sup>, lb/day</b>	<b>CO2, lb/year</b>
Source Test Related Trips	120	1	30	2.83	0.87	0.22	0.002	0.14	0.13	30,398
Diesel Delivery	9	1	30	2.8	0.87	0.22	0.0024	0.14	0.13	2,280
<b>Total</b>				5.7	1.74	0.45	0.005	0.28	0.27	32,678

**Table C-10  
2010 Vehicle Operational Emissions**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	26	2	178	33.59	10.30	2.66	0.028	1.64	1.58	39,079
New Catalyst Delivery Truck	46	3	30	8.49	2.60	0.67	0.007	0.42	0.40	11,653
Source Test Related Trips	121	2	30	5.66	1.74	0.45	0.005	0.28	0.27	30,652
Diesel Delivery	45	1	30	2.83	0.87	0.22	0.002	0.14	0.13	11,399
<b>Total</b>				50.6	15.5	4.0	0.042	2.5	2.4	92,783

**Table C-11  
2011 Vehicle Operational Emissions**

**SCR**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	30	2	178	33.59	10.30	2.66	0.028	1.64	1.58	45,091
New Catalyst Delivery Truck	46	3	30	8.49	2.60	0.67	0.007	0.42	0.40	11,653
Spent Carbon Haul Truck	92	1	30	2.83	0.87	0.22	0.002	0.14	0.13	23,305
New Carbon Delivery Truck	92	1	30	2.83	0.87	0.22	0.002	0.14	0.13	23,305
Source Test Related Trips	121	2	30	5.66	1.74	0.45	0.005	0.28	0.27	30,652
Ammonia Delivery	19	1	30	2.83	0.87	0.22	0.002	0.14	0.13	4,813
Diesel Delivery	170	2	30	5.66	1.74	0.45	0.005	0.28	0.27	43,064
<b>Total</b>				61.9	19.0	4.9	0.1	126.0	125.9	181,883.8

**Gas Turbine**

**Table C-11 (Continued)**  
**2011 Vehicle Operational Emissions**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	30	2	178	33.6	10.3	2.7	0.028	1.6	1.6	225,664
New Catalyst Delivery Truck	46	3	30	8.5	2.6	0.7	0.007	0.4	0.4	7,883
Spent Carbon Haul Truck	92	1	30	2.8	0.9	0.2	0.002	0.1	0.1	23,305
New Carbon Delivery Truck	92	1	30	2.8	0.9	0.2	0.002	0.1	0.1	23,305
Source Test Related Trips	121	1	30	2.8	0.9	0.2	0.002	0.1	0.1	29,132
Diesel Delivery	170	1	30	2.8	0.9	0.2	0.002	0.1	0.1	5,573
<b>Total</b>				53.3	16.5	4.2	0.043	2.4	2.4	314,862

**Microturbine**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	150	2	178	33.6	10.3	2.7	0.028	1.64	1.6	225,664
New Catalyst Delivery Truck	46	3	30	8.5	2.6	0.7	0.007	0.42	0.4	7,883
Spent Carbon Haul Truck	92	1	30	2.8	0.9	0.2	0.002	0.14	0.1	23,305
New Carbon Delivery Truck	92	1	30	2.8	0.9	0.2	0.002	0.14	0.1	23,305
Source Test Related Trips	121	1	30	2.8	0.9	0.2	0.002	0.14	0.1	29,132
Diesel Delivery	170	1	30	2.8	0.9	0.2	0.002	0.14	0.1	5,573
<b>Total</b>				53.3	16.5	4.2	0.043	2.6	2.4	314,862

**Table C-11 (Concluded)**  
**2011 Vehicle Operational Emissions**

**Gas Turbine/LNG**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> <sup>d</sup> , lb/day	CO <sub>2</sub> , lb/year
Spent Catalyst Haul Truck	150	2	178	33.6	10.3	2.66	0.028	1.6	1.6	225,664
New Catalyst Delivery Truck	31	3	30	8.5	2.6	0.67	0.007	0.42	0.4	7,883
Spent Carbon Haul Truck	92	1	30	2.8	0.9	0.22	0.002	0.14	0.1	23,305
New Carbon Delivery Truck	92	1	30	2.8	0.9	0.22	0.002	0.14	0.1	23,305
Source Test Related Trips	121	2	30	5.7	1.7	0.448	0.005	0.28	0.27	30,652
Diesel Delivery	170	2	30	5.7	1.7	0.448	0.005	0.28	0.27	43,064
LNG Haul Truck	1,360	12	40	45.3	13.9	3.6	0.038	2.2	2.1	459,354
<b>Total</b>				104.4	32.0	8.2	0.09	5.1	4.9	813,228

**Microturbine LNG**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> <sup>d</sup> , lb/day	CO <sub>2</sub> , lb/year
Spent Catalyst Haul Truck	150	2	178	33.6	10.3	2.7	0.0282	1.6	1.58	225,664
New Catalyst Delivery Truck	31	3	30	8.5	2.60	0.67	0.0071	0.42	0.40	7,883
Spent Carbon Haul Truck	92	1	30	2.8	0.87	0.22	0.0024	0.14	0.13	23,305
New Carbon Delivery Truck	92	1	30	2.8	0.87	0.22	0.0024	0.14	0.13	23,305
Source Test Related Trips	121	2	30	5.7	1.74	0.45	0.0048	0.28	0.27	30,652
Diesel Delivery	170	2	30	5.7	1.74	0.45	0.0048	0.28	0.27	43,064
LNG Haul Truck	1,360	12	40	45.3	13.9	3.6	0.0380	2.22	2.14	459,354
<b>Total</b>				104.4	32.0	8.2	0.088	5.1	4.9	813,228

There are three possible Class I disposal sites in California: Kettleman City (178 miles from Los Angeles), Buttonwillow (133 miles from Los Angeles), and Westmorland (192 miles from Los Angeles). The intermediate distance, 178 miles per one-way trip, was chosen for this analysis.

**Table C-12  
2012 Vehicle Operational Emissions**

**SCR**

<b>Description</b>	<b>Annual No of Trips<sup>b</sup></b>	<b>Daily No of Trips<sup>b</sup></b>	<b>One-way Distance<sup>c</sup>, miles</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5<sup>d</sup>, lb/day</b>	<b>CO2, lb/year</b>
Spent Catalyst Haul Truck	123	3	178	50.4	15.45	3.98	0.042	2.47	2.38	185,411
New Catalyst Delivery Truck	183	3	30	8.49	2.60	0.67	0.007	0.42	0.40	46,269
Spent Carbon Haul Truck	184	2	30	5.66	1.74	0.45	0.005	0.28	0.27	46,611
New Carbon Delivery Truck	184	2	30	5.66	1.74	0.45	0.005	0.28	0.27	46,611
Source Test Related Trips	121	2	30	5.66	1.74	0.45	0.005	0.28	0.27	30,652
Ammonia Delivery	38	1	30	2.83	0.87	0.22	0.002	0.14	0.13	9,626
Diesel Delivery	178	2	30	5.66	1.74	0.45	0.005	0.28	0.27	45,091
<b>Total</b>				84	26	6.7	0.071	127	127	410,270

**Gas Turbine**

<b>Description</b>	<b>Annual No of Trips<sup>b</sup></b>	<b>Daily No of Trips<sup>b</sup></b>	<b>One-way Distance<sup>c</sup>, miles</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5<sup>d</sup>, lb/day</b>	<b>CO2, lb/year</b>
Spent Catalyst Haul Truck	123	3	178	50.4	15.4	4.0	0.042	2.5	2.4	185,411
New Catalyst Delivery Truck	123	3	30	8.5	2.6	0.7	0.007	0.4	0.4	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.4	0.005	0.3	0.3	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.4	0.005	0.3	0.3	46,611
Source Test Related Trips	121	2	30	5.7	1.7	0.4	0.005	0.3	0.3	30,652
Diesel Delivery	178	2	30	5.7	1.7	0.4	0.005	0.3	0.3	45,091
<b>Total</b>				82	25	6.4	0.068	4.0	3.8	385,625

**Table C-12 (Continued)**  
**2012 Vehicle Operational Emissions**

**Microturbine**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	123	3	178	50.4	15.4	4.0	0.042	2.47	2.4	185,411
New Catalyst Delivery Truck	123	3	30	8.5	2.6	0.7	0.007	0.42	0.4	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.4	0.005	0.28	0.3	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.4	0.005	0.28	0.3	46,611
Source Test Related Trips	121	2	30	5.7	1.7	0.4	0.005	0.28	0.3	30,652
Diesel Delivery	178	2	30	5.7	1.7	0.4	0.005	0.28	0.3	45,091
<b>Total</b>				82	25	6.4	0.068	4.0	3.8	385,625

**Gas Turbine/LNG**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	123	3	178	50.4	15.4	3.98	0.042	2.47	2.4	185,411
New Catalyst Delivery Truck	123	3	30	8.5	2.6	0.67	0.0071	0.42	0.4	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.45	0.0048	0.28	0.3	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.45	0.0048	0.28	0.3	46,611
Source Test Related Trips	121	2	30	5.7	1.7	0.448	0.0048	0.28	0.27	30,652
Diesel Delivery	178	2	30	5.7	1.7	0.448	0.0048	0.28	0.27	45,091
LNG Haul Truck	1,943	17	40	64.2	19.7	5.1	0.054	3.1	3.0	656,113
<b>Total</b>				146	44.7	11.5	0.12	7.1	6.9	1,041,738



**Table C-12 (Concluded)**  
**2012 Vehicle Operational Emissions**

**Microturbine/LNG**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> <sup>d</sup> , lb/day	CO <sub>2</sub> , lb/year
Spent Catalyst Haul Truck	123	3	178	50.4	15.4	4.0	0.042	2.5	2.38	185,411
New Catalyst Delivery Truck	123	3	30	8.5	2.60	0.67	0.0071	0.42	0.40	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.74	0.45	0.0048	0.28	0.27	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.74	0.45	0.0048	0.28	0.27	46,611
Source Test Related Trips	121	2	30	5.7	1.74	0.45	0.0048	0.28	0.27	30,652
Diesel Delivery	178	2	30	5.7	1.74	0.45	0.0048	0.28	0.27	45,091
LNG Haul Truck	1,943	17	40	64.2	19.7	5.1	0.054	3.1	3.0	656,113
<b>Total</b>				146	44.7	11.5	0.12	7.1	6.9	1,041,738

There are three possible Class I disposal sites in California: Kettleman City (178 miles from Los Angeles), Buttonwillow (133 miles from Los Angeles), and Westmorland (192 miles from Los Angeles). The intermediate distance, 178 miles per one-way trip, was chosen for this analysis.

**Table C-13**  
**2014 Vehicle Operational Emissions**

**SCR**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> <sup>d</sup> , lb/day	CO <sub>2</sub> , lb/year
Spent Catalyst Haul Truck	163	6	178	101	30.9	7.97	0.085	4.9	4.8	244,822
New Catalyst Delivery Truck	163	6	30	17.0	5.2	1.34	0.014	0.83	0.80	41,262
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.45	0.005	0.28	0.27	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.45	0.005	0.28	0.27	46,611
Source Test Related Trips	121	2	30	5.7	1.74	0.45	0.005	0.28	0.27	30,652
Ammonia Delivery	38	1	30	2.8	0.87	0.22	0.002	0.14	0.13	9,626
Diesel Delivery	178	2	30	5.7	1.7	0.45	0.005	0.28	0.27	45,091
<b>Total</b>				143	44	11	0.120	130	130	464,675

**Table C-13 (Continued)**  
**2014 Vehicle Operational Emissions**

**Gas Turbine**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	123	6	178	101	30.9	8.0	0.085	4.9	4.8	185,411
New Catalyst Delivery Truck	123	6	30	17.0	5.2	1.3	0.014	0.8	0.8	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.4	0.005	0.3	0.3	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.4	0.005	0.3	0.3	46,611
Source Test Related Trips	121	2	30	5.7	1.7	0.4	0.005	0.3	0.3	30,652
Diesel Delivery	178	2	30	5.7	1.7	0.4	0.005	0.3	0.3	45,091
<b>Total</b>				140	43.0	11	0.12	6.9	6.6	385,625

**Microturbine**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 <sup>d</sup> , lb/day	CO2, lb/year
Spent Catalyst Haul Truck	123	6	178	101	30.9	8.0	0.085	4.9	4.8	185,411
New Catalyst Delivery Truck	123	6	30	17.0	5.2	1.3	0.014	0.83	0.80	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.4	0.005	0.28	0.27	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.4	0.005	0.28	0.27	46,611
Source Test Related Trips	121	2	30	5.7	1.7	0.4	0.005	0.28	0.27	30,652
Diesel Delivery	178	2	30	5.7	1.7	0.4	0.005	0.28	0.27	45,091
<b>Total</b>				140	43.0	11.1	0.118	6.9	6.6	385,625

**Table C-13 (Continued)**  
**2014 Vehicle Operational Emissions**

**Gas Turbine/LNG**

<b>Description</b>	<b>Annual No of Trips<sup>b</sup></b>	<b>Daily No of Trips<sup>b</sup></b>	<b>One-way Distance<sup>c</sup>, miles</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5<sup>d</sup>, lb/day</b>	<b>CO2, lb/year</b>
Spent Catalyst Haul Truck	123	6	178	101	30.9	7.97	0.085	4.93	4.8	185,411
New Catalyst Delivery Truck	123	6	30	17.0	5.2	1.34	0.014	0.83	0.80	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.7	0.45	0.005	0.28	0.27	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.7	0.45	0.005	0.28	0.27	46,611
Source Test Related Trips	121	2	30	5.7	1.7	0.448	0.005	0.28	0.27	30,652
Diesel Delivery	178	2	30	5.7	1.7	0.448	0.005	0.28	0.27	45,091
LNG Haul Truck	3,885	33	40	125	38.2	9.8	0.105	6.10	5.9	1,312,227
<b>Total</b>				265	81.2	20.9	0.22	13.0	12.5	1,697,851

**Table C-13 (Concluded)**  
**2014 Vehicle Operational Emissions**

**Microturbine/LNG**

Description	Annual No of Trips <sup>b</sup>	Daily No of Trips <sup>b</sup>	One-way Distance <sup>c</sup> , miles	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> <sup>d</sup> , lb/day	CO <sub>2</sub> , lb/year
Spent Catalyst Haul Truck	123	6	178	101	30.9	8.0	0.085	4.9	4.8	185,411
New Catalyst Delivery Truck	123	6	30	17.0	5.21	1.34	0.014	0.83	0.80	31,249
Spent Carbon Haul Truck	184	2	30	5.7	1.74	0.45	0.005	0.28	0.27	46,611
New Carbon Delivery Truck	184	2	30	5.7	1.74	0.45	0.005	0.28	0.27	46,611
Source Test Related Trips	121	2	30	5.7	1.74	0.45	0.005	0.28	0.27	30,652
Diesel Delivery	178	2	30	5.7	1.74	0.45	0.005	0.28	0.27	45,091
LNG Haul Truck	3,885	33	40	125	38.2	9.8	0.105	6.1	5.9	1,312,227
<b>Total</b>				265	81.2	20.9	0.222	13.0	12.5	1,697,851

There are three possible Class I disposal sites in California: Kettleman City (178 miles from Los Angeles), Buttonwillow (133 miles from Los Angeles), and Westmorland (192 miles from Los Angeles). The intermediate distance, 178 miles per one-way trip, was chosen for this analysis.

**Table C-14**  
**Summary of Operational Emissions**

**SCR - Total Operational Emissions**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> , lb/day	CO <sub>2</sub> , ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	9,004	53,900	2,467	545	873	871	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	6,415	22,432	1,799	544	859	857	
<b>2010</b>	5,823	17,295	1,281	534	837	835	1,207,871
	5,828	17,328	1,290	535	838	836	
<b>2011</b>	5,345	13,475	1,207	528	821	819	1,196,652
	5,350	13,508	1,216	529	822	820	
<b>2012</b>	4,125	13,423	1,011	538	830	829	1,231,595
<b>2014</b>	4,184	13,441	1,015	538	833	831	1,231,622

**Table C-14 (Continued)**  
**Summary of Operational Emissions**

**Gas Turbines - Total Operational Emissions**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,823	17,295	1,281	534	837	835	1,207,871
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>	
<b>2011</b>	5,339	13,473	1,206	528	821	819	1,196,720
	<u>5,344</u>	<u>13,506</u>	<u>1,215</u>	<u>529</u>	<u>822</u>	<u>820</u>	
<b>2012</b>	4,825	7,357	533	538	1,016	1,014	1,231,271
<b>2014</b>	4,884	7,375	537	538	1,019	1,017	1,231,271

**Microturbines - Total Operational Emissions**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,823	17,295	1,281	534	837	835	1,207,871
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>	
<b>2011</b>	5,339	13,473	1,206	528	821	819	1,196,720
	<u>5,344</u>	<u>13,506</u>	<u>1,215</u>	<u>529</u>	<u>822</u>	<u>820</u>	
<b>2012</b>	3,860	6,169	638	538	757	756	1,231,385
<b>2014</b>	3,919	6,187	643	538	760	758	1,231,385

**Table C-14 (Concluded)**  
**Summary of Operational Emissions**

**Gas Turbines/LNG - Total Operational Emissions**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	
<b>2009</b>	6,440	23,215	1,814	543	860	858	1,232,969
	<u>6,445</u>	<u>23,248</u>	<u>1,823</u>	<u>544</u>	<u>861</u>	<u>859</u>	
<b>2010</b>	5,823	17,295	1,281	534	837	835	1,207,871
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>	
<b>2011</b>	5,390	13,489	1,210	528	823	821	1,196,970
	<u>5,395</u>	<u>13,522</u>	<u>1,219</u>	<u>529</u>	<u>824</u>	<u>822</u>	
<b>2012</b>	4,254	6,503	523	211	872	870	1,093,223
<b>2014</b>	4,373	6,540	533	211	878	876	1,093,551

**Microturbines/LNG - Total Operational Emissions**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,823	17,295	1,281	534	837	835	1,207,871
	<u>5,828</u>	<u>17,328</u>	<u>1,290</u>	<u>535</u>	<u>838</u>	<u>836</u>	
<b>2011</b>	5,390	13,489	1,210	528	823	821	1,196,970
	<u>5,395</u>	<u>13,522</u>	<u>1,219</u>	<u>529</u>	<u>824</u>	<u>822</u>	
<b>2012</b>	3,870	6,038	569	211	767	765	1,093,331
<b>2014</b>	3,989	6,075	578	211	773	771	1,093,659

**Table C-15  
Construction of an LNG Plant – Grading**

<b>Construction Activity</b>			
Three Acre Site	Grading	130,000	Square Feet <sup>a</sup>

<b>Site Preparation Schedule -</b>		<b>6 days<sup>a</sup></b>	
<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>
Scrapers	1	8.0	5
Graders	1	8.0	
Tractors/Loaders/Backhoes	1	7.0	

<b>Construction Equipment Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Equipment Type<sup>c</sup></b>	lb/hr	lb/hr	lb/hr			
Scrapers	1.525	3.399	0.147	0.368	0.003	262.5
Graders	0.671	1.720	0.089	0.206	0.001	132.7
Tractors/Loaders/Backhoes	0.414	0.830	0.064	0.131	0.001	66.8

<b>Fugitive Dust Clearing Parameters - Scraping</b>						
	<b>Mean Vehicle Weight<sup>e</sup></b>	<b>Vehicle Miles Traveled<sup>f</sup></b>				
<b>Silt Content<sup>d</sup></b>	ton					
6.9	88.73	0.43				

<b>Fugitive Dust Stockpiling Parameters</b>						
	<b>Precipitation Days<sup>g</sup></b>	<b>Mean Wind Speed Percent<sup>h</sup></b>	<b>TSP Fraction</b>	<b>Area<sup>i</sup> (acres)</b>		
<b>Silt Content<sup>d</sup></b>						
6.9	10	100	0.5	0.11		

**Table C-15 (Continued)  
Construction of an LNG Plant – Grading**

<b>Fugitive Dust Material Handling</b>				
<b>Aerodynamic Particle Size Multiplier<sup>i</sup></b>	<b>Mean Wind Speed<sup>k</sup></b> mph	<b>Moisture Content<sup>f</sup></b>	<b>Dirt Handled<sup>a</sup></b> cy	<b>Dirt Handled<sup>l</sup></b> lb/day
0.35	10	7.9	778	324,167

<b>Construction Vehicle (Mobile Source) Emission Factors</b>						
	<b>CO</b> lb/mile	<b>NOx</b> lb/mile	<b>PM10</b> lb/mile	<b>VOC</b> lb/mile	<b>SOx</b> lb/mile	<b>CO2</b> lb/mile
Heavy-Duty Truck <sup>m</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.221844935
Passenger Vehicle	0.01155158	0.00121328	0.00008447	0.00118234	0.00001078	1.106722361

<b>Construction Worker Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>One Way Trip Length (miles)</b>
Haul Truck <sup>n</sup>	5	30
Water Truck <sup>o</sup>	3	4.2
Worker Vehicles	5	10

<b>Incremental Increase in Onsite Combustion Emissions from Construction Equipment</b>						
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)						
<b>Equipment Type</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day
Scrapers	12.20	27.19	1.17	2.94	0.02	2100.0
Graders	5.37	13.76	0.71	1.64	0.01	1061.9
Tractors/Loaders/Backhoes	2.90	5.81	0.45	0.91	0.01	467.6
<b>Total</b>	<b>20.5</b>	<b>46.8</b>	<b>2.3</b>	<b>5.5</b>	<b>0.04</b>	<b>3629.6</b>



**Table C-15 (Continued)  
Construction of an LNG Plant – Grading**

<b>Incremental Increase in Fugitive Dust Emissions from Construction Operations</b>		
<b>Equations:</b>		
Scraping <sup>p</sup> : PM10 Emissions (lb/day) = 1.5 x (silt content/12) <sup>0.9</sup> x (mean vehicle weight) <sup>0.45</sup> x VMT x (1 - control efficiency)		
Storage Piles <sup>q</sup> : PM10 Emissions (lb/day) = 1.7 x (silt content/1.5) x ((365-precipitation days)/235) x wind speed percent/15 x TSP fraction x Area) x (1 - control efficiency)		
Material Handling <sup>r</sup> : PM10 Emissions (lb/day) = (0.0032 x aerodynamic particle size multiplier x (wind speed (mph)/5) <sup>1.3</sup> /(moisture content/2) <sup>1.4</sup> x dirt handled (lb/day)/2,000 (lb/ton) (1 - control efficiency)		
<b>Description</b>	<b>Control Efficiency</b>	<b>PM10<sup>s</sup></b>
	%	lb/day
Scraping	68	0.58
Storage Piles	68	1.39
Material Handling	68	0.02
<b>Total</b>		<b>1.99</b>

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)						
<b>Vehicle</b>	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Haul Truck	4.34	14.2	0.69	1.12	0.01	1,267
Water Truck	0.36	1.19	0.06	0.09	0	106
Worker Vehicles	1.16	0.12	0.01	0.12	0	111
<b>Total</b>	<b>5.86</b>	<b>15.46</b>	<b>0.76</b>	<b>1.33</b>	<b>0.01</b>	<b>1,484</b>

**Table C- 15 (Continued)  
Construction of an LNG Plant – Grading**

<b>Total Incremental Localized Emissions from Construction Activities</b>						
<b>Sources</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day
Daily Emissions	<b>26.3</b>	<b>62.2</b>	<b>5.1</b>	<b>6.8</b>	<b>0.1</b>	<b>5,113</b>
Annual Emissions	<b>158.0</b>	<b>373.4</b>	<b>30.5</b>	<b>41.0</b>	<b>0.3</b>	<b>30,679</b>

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>t</sup></b>	<b>PM10</b> lb/day	<b>PM2.5</b> lb/day	<b>Percentage Contribution</b>
Combustion (Offroad)	0.92	2.3	2.1	65.0%
Combustion (Onroad)	0.96	0.76	0.74	22.3%
Fugitive	0.21	2	0.4	12.7%
Daily Emissions		<b>5.1</b>	<b>3.3</b>	
Annual Emissions		<b>30.5</b>	<b>19.8</b>	

**Notes:**

- a) SCAQMD, estimated from survey data, Sept 2004
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.
- d) USEPA, AP-42, July 1998, Table 11.9-3 Typical Values for Correction Factors Applicable to the Predictive Emission Factor Equations
- e) Mean vehicle weight (120,460 pound empty with a 75,000 pound capacity) estimated from 631G Model Scraper Caterpillar Performance Handbook, Edition 33. Scraper in the same horsepower range (450-490 hp) as the composite ARB emission factors.
- f) Caterpillar G31G has a 11.5 foot wide blade, with an assumed 2 foot overlap (9.5 foot wide). Vehicle miles traveled (VMT) = (130,000 sq ft/9.5 foot x mile/5,280 ft)/6 days = 0.43 miles
- g) Table A9-9-E2, SCAQMD CEQA Air Quality Handbook, 1993
- h) Mean wind speed percent - percent of time mean wind speed exceeds 12 mph. At least one meteorological site recorded wind speeds greater than 12 mph over a 24-hour period in 1981.
- i) Assumed storage piles are 0.11 acres in size
- j) USEPA, AP-42, Jan 1995, Section 13.2.4 Aggregate Handling and Storage Piles, p 13.2.4-3 Aerodynamic particle size multiplier for < 10 μm
- k) Mean wind speed - maximum of daily average wind speeds reported in 1981 meteorological data.
- l) Assuming 778 cubic yards of dirt handled [(778 cyd x 2,500 lb/cyd)/ days = 324,167 lb/day]
- m) CARB, EMFAC2007 (version 2.3) Burden Model, Winter 2007, 75 F, 40% RH: EF, lb/yr = (EF, ton/yr x 2,000 lb/ton)/VMT

**Table C-15 (Concluded)  
Construction of an LNG Plant – Grading**

n) Assumed 30 cubic yd truck capacity for 778 cyd of dirt [(778 cy x truck/30 cy)/6 days = 5 one-way truck trips/day]. Assumed haul truck travels 0.1 miles through facility. Multiple trucks may be used.				
o) Assumed six foot wide water truck traverses over 130,000 square feet of disturbed area				
p) USEPA, AP-42, July 1998, Equation 1b and Table 13.2.2-2, AP-42, December 2003. Also see comment g of Table 11.9-1				
q) USEPA, AP-42, Jan 1995, Section 13.2.4 Aggregate Handling and Storage Piles, Equation 1				
r) USEPA, Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures, Sept 1992, EPA-450/2-92-004, Equation 2-12				
s) Includes watering at least three times a day per Rule 403 (68% control efficiency).				
t) ARB's CEIDARS database PM2.5 fractions - construction dust category for fugitive and diesel vehicle exhaust category for combustion.				

**Table C-16  
Construction of an LNG Plant – Paving**

Three Acre Site	<b>Construction Activity</b> Architectural Coating and Asphalt Paving of Parking Lot
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<b>Construction Schedule -</b>	<b>10 days<sup>a</sup></b>		
<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>
Pavers	1	8.00	8
Paving Equipment	1	8.00	
Rollers	2	8.00	
Cement and Mortar Mixers	1	3.00	
Tractors/Loaders/Backhoes	1	8.00	

<b>Construction Equipment Combustion Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Equipment Type<sup>c</sup></b>	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Pavers	0.600	1.129	0.080	0.206	0.001	77.9
Paving Equipment	0.469	1.033	0.071	0.156	0.001	69.0
Rollers	0.442	0.907	0.063	0.141	0.001	67.1
Cement and Mortar Mixers	0.046	0.069	0.005	0.012	0.000	7.2
Tractors/Loaders/Backhoes	0.414	0.830	0.064	0.131	0.001	66.8

<b>Construction Vehicle (Mobile Source) Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Heavy-Duty Truck <sup>d</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.221844935

**Table C-16 (Continued)  
Construction of an LNG Plant – Paving**

<b>Construction Worker Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>Trip Length (miles)</b>
Delivery Truck <sup>e</sup>	9	20
Water Truck <sup>f</sup>	3	4.5

<b>Incremental Increase in Onsite Combustion Emissions from Construction Equipment</b>						
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)						
<b>Equipment Type</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>
Pavers	4.80	9.03	0.64	1.65	0.01	623.49
Paving Equipment	3.75	8.27	0.57	1.24	0.01	551.62
Rollers	7.07	14.52	1.01	2.26	0.01	1,072.88
Cement and Mortar Mixers	0.14	0.21	0.01	0.04	0.00	21.74
Tractors/Loaders/Backhoes	3.31	6.64	0.51	1.05	0.01	534.46
<b>Total</b>	<b>19.1</b>	<b>38.7</b>	<b>2.7</b>	<b>6.2</b>	<b>0.0</b>	<b>2,804.19</b>

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)						
<b>Vehicle</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>
Delivery Truck	5.21	16.99	0.831	1.343	0.014	1519.864
Water Truck	0.39	1.27	0.06	0.1	0	113.99
<b>Total</b>	<b>5.60</b>	<b>18.26</b>	<b>0.89</b>	<b>1.44</b>	<b>0.01</b>	<b>1633.85</b>

**Table C-16 (Concluded)  
Construction of an LNG Plant – Paving**

<b>Total Incremental Combustion Emissions from Construction Activities</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Sources</b>	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Daily Emissions	<b>24.7</b>	<b>56.9</b>	<b>3.6</b>	<b>7.7</b>	<b>0.1</b>	<b>4,438</b>
Annual Emissions	<b>246.7</b>	<b>569.3</b>	<b>36.3</b>	<b>76.8</b>	<b>0.540</b>	<b>44,380</b>

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>g</sup></b>	<b>PM10</b>	<b>PM2.5</b>
		lb/day	lb/day
Combustion (Offroad)	0.92	2.7	2.5
Combustion (Onroad)	0.96	0.89	0.86
Fugitive	0.21	0	0.0
Daily Emissions		<b>3.6</b>	<b>3.4</b>
Annual Emissions		<b>36.3</b>	<b>33.8</b>

**Notes:**

- a) SCAQMD, estimated from survey data, Sept 2004
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.
- d) CARB, EMFAC2007 (version 2.3) Burden Model, Winter 2007, 75 F, 40% RH: EF, lb/yr = (EF, ton/yr x 2,000 lb/ton)/VMT
- e) Assumed haul truck travels 0.1 miles through facility
- f) Assumed six foot wide water truck traverses over 140,000 square feet of disturbed area
- t) ARB's CEIDARS database PM2.5 fractions - construction dust category for fugitive and diesel vehicle exhaust category for combustion.

**Table C-17  
Construction of an LNG Plant – Structure Construction**

<b>Construction Activity</b> Internal Combustion Engine and Equipment Installation
---

<b>Construction Schedule</b>	95 days <sup>a</sup>		
<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>
Cranes	2	7.0	15
Rubber Tired Loaders	2	7.0	
Forklifts	2	7.0	
Welder	3	7.0	
Generator Sets	3	7.0	

<b>Construction Equipment Combustion Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Equipment Type<sup>c</sup></b>	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Cranes	0.637	1.695	0.075	0.188	0.001	128.7
Rubber Tired Loaders	0.555	1.382	0.077	0.173	0.001	108.6
Forklifts	0.250	0.643	0.035	0.086	0.001	54.4

<b>Construction Vehicle (Mobile Source) Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Heavy-Duty Truck <sup>d</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.222
Passenger Vehicle	0.01155158	0.00121328	0.00008447	0.00118234	0.00001078	1.107

**Table C-17 (Continued)  
Construction of an LNG Plant – Structure Construction (Continued)**

<b>Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>One Way Trip Length (miles)</b>
Haul Trucks <sup>e</sup>	4	20
Worker Vehicles	15	10

<b>Incremental Increase in Onsite Idling Emissions from Onroad Mobile Vehicles</b>							
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)							
<b>Equipment Type</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>	
Cranes	8.91	23.73	1.06	2.63	0.019	1801.428	
Rubber Tired Loaders	7.77	19.35	1.08	2.42	0.017	1520.591	
Forklifts	3.49	9.00	0.48	1.21	0.008	761.541	
Welder	0.00	0.00	0.00	0.00	0.000	0.000	
Generator Sets	0.00	0.00	0.00	0.00	0.000	0.000	
<b>Total</b>	<b>20.18</b>	<b>52.08</b>	<b>2.62</b>	<b>6.26</b>	<b>0.045</b>	<b>4,084</b>	

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>							
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)							
<b>Vehicle</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>	
Flatbed Trucks	2.314	7.549	0.3694	0.5967	0.0063	675.4952	
Worker Vehicles	3.465	0.364	0.0253	0.3547	0.0032	332.0167	
<b>Total</b>	<b>5.78</b>	<b>7.91</b>	<b>0.39</b>	<b>0.95</b>	<b>0.01</b>	<b>1,008</b>	



**Table C-17 (Concluded)  
Construction of an LNG Plant – Structure Construction (Continued)**

<b>Total Incremental Combustion Emissions from Construction Activities</b>						
<b>Sources</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day
Daily Emissions	<b>26.0</b>	<b>60.0</b>	<b>3.01</b>	<b>7.21</b>	<b>0.05</b>	<b>5,091</b>
Annual Emissions	<b>2,466</b>	<b>5,699</b>	<b>286</b>	<b>685</b>	<b>5.1</b>	<b>483,652</b>

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>f</sup></b>	<b>PM10</b> lb/day	<b>PM2.5</b> lb/day
Combustion, Offroad	0.92	2.6	2.4
Combustion, Onroad	0.964	0.4	0.38
Daily Emissions		<b>3.0</b>	<b>2.8</b>
Annual Emissions		<b>286.0</b>	<b>264.8</b>

**Notes:**

- a) SCAQMD, staff estimation
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, June 2007. Assumed equipment is diesel fueled.
- d) CARB, EMFAC2002 as summarized on SCAQMD website at [http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05\\_25.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls)
- e) Assumed haul truck travels 20 miles one-way
- f) ARB's CEIDARS database PM2.5 fractions - construction dust category for offroad and onroad diesel vehicle exhaust category for combustion.

**Table C-18  
Construction of Control Equipment or Replacement of an ICE – Paving**

<b>Construction Activity</b> Concrete Paving	
<b>Construction Schedule -</b>	<b>1 days<sup>a</sup></b>

<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>
Pavers	1	4.00	8
Paving Equipment	1	4.00	
Rollers	1	2.00	
Cement and Mortar Mixers	1	3.00	
Tractors/Loaders/Backhoes	1	4.00	

<b>Construction Equipment Combustion Emission Factors</b>							
<b>Equipment Type<sup>c</sup></b>	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>	
	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	
Pavers	0.600	1.129	0.080	0.206	0.001	77.9	
Paving Equipment	0.469	1.033	0.071	0.156	0.001	69.0	
Rollers	0.442	0.907	0.063	0.141	0.001	67.1	
Cement and Mortar Mixers	0.046	0.069	0.005	0.012	0.000	7.2	
Tractors/Loaders/Backhoes	0.414	0.830	0.064	0.131	0.001	66.8	

<b>Construction Vehicle (Mobile Source) Emission Factors</b>							
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>	
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	
Heavy-Duty Truck <sup>d</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.221844935	

**Table C-18 (Continued)  
Construction of Control Equipment or Replacement of an ICE – Paving**

<b>Construction Worker Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>Trip Length (miles)</b>
Delivery Truck <sup>e</sup>	2	20
Water Truck <sup>f</sup>	3	4.5

<b>Incremental Increase in Onsite Combustion Emissions from Construction Equipment</b>						
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)						
<b>Equipment Type</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>
Pavers	2.40	4.52	0.32	0.82	0.0036	311.74
Paving Equipment	1.88	4.13	0.28	0.62	0.0032	275.81
Rollers	0.88	1.81	0.13	0.28	0.0015	134.11
Cement and Mortar Mixers	0.14	0.21	0.01	0.04	0.0003	21.74
Tractors/Loaders/Backhoes	1.66	3.32	0.26	0.52	0.0031	267.23
<b>Total</b>	<b>7.0</b>	<b>14.0</b>	<b>1.0</b>	<b>2.3</b>	<b>0.012</b>	<b>1,010.63</b>

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)						
<b>Vehicle</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>
Delivery Truck	1.16	3.78	0.185	0.298	0.00317	337.7
Water Truck	0.39	1.27	0.062	0.10	0.001	114.0
<b>Total</b>	<b>1.55</b>	<b>5.05</b>	<b>0.25</b>	<b>0.40</b>	<b>0.0042</b>	<b>451.7</b>

**Table C-18 (Concluded)  
Construction of Control Equipment or Replacement of an ICE – Paving**

<b>Total Incremental Combustion Emissions from Construction Activities</b>							
<b>Sources</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day	
Daily Emissions	<b>8.5</b>	<b>19.0</b>	<b>1.2</b>	<b>2.7</b>	<b>0.0160</b>	<b>1,462</b>	
Annual Emissions	<b>8.5</b>	<b>19.0</b>	<b>1.2</b>	<b>2.7</b>	<b>0.0160</b>	<b>1,462</b>	

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>g</sup></b>	<b>PM10</b> lb/day	<b>PM2.5</b> lb/day
Combustion (Offroad)	0.92	1.0	0.9
Combustion (Onroad)	0.96	0.25	0.24
Fugitive	0.21	0	0.0
Daily Emissions		<b>1.2</b>	<b>1.2</b>
Annual Emissions		<b>1.2</b>	<b>1.2</b>

**Notes:**

- a) SCAQMD, estimated from survey data, Sept 2004
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.
- d) CARB, EMFAC2007 (version 2.3) Burden Model, Winter 2007, 75 F, 40% RH: EF, lb/yr = (EF, ton/yr x 2,000 lb/ton)/VMT
- e) Assumed haul truck travels 0.1 miles through facility
- f) Assumed six foot wide water truck traverses over 140,000 square feet of disturbed area
- g) ARB's CEIDARS database PM2.5 fractions - construction dust category for fugitive and diesel vehicle exhaust category for combustion.

**Table C-19  
Construction of Control Equipment or Replacement of an ICE – Equipment**

<b>Construction Activity</b> Internal Combustion Engine and Equipment Installation
---

<b>Construction Schedule</b>	2 days		
<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>
Cranes	1	7.0	11
Rubber Tired Loaders	2	7.0	
Forklifts	3	7.0	
Welder	1	7.0	
Generator Sets	1	7.0	

<b>Construction Equipment Combustion Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Equipment Type<sup>c</sup></b>	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Cranes	0.637	1.695	0.075	0.188	0.001	128.7
Rubber Tired Loaders	0.555	1.382	0.077	0.173	0.001	108.6
Forklifts	0.250	0.643	0.035	0.086	0.001	54.4

<b>Construction Vehicle (Mobile Source) Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Heavy-Duty Truck <sup>d</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.221844935
Passenger Vehicle	0.01155158	0.00121328	0.00008447	0.00118234	0.00001078	1.106722361

**Table C-19 (Continued)**  
**Construction of Control Equipment or Replacement of an ICE – Equipment**

<b>Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>One Way Trip Length (miles)</b>
Haul Trucks <sup>e</sup>	4	20
Worker Vehicles	11	10

<b>Incremental Increase in Onsite Idling Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)						
<b>Equipment Type</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>
Cranes	4.46	11.86	0.53	1.32	0.010	901
Rubber Tired Loaders	7.77	19.35	1.08	2.42	0.017	1,521
Forklifts	5.24	13.50	0.73	1.81	0.013	1,142
Welder	0.00	0.00	0.00	0.00	0.000	0
Generator Sets	0.00	0.00	0.00	0.00	0.000	0
<b>Total</b>	<b>17.47</b>	<b>44.72</b>	<b>2.33</b>	<b>5.55</b>	<b>0.039</b>	<b>3,564</b>

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)						
<b>Vehicle</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>
Flatbed Trucks	2.314	7.549	0.3694	0.5967	0.0063	675
Worker Vehicles	2.541	0.267	0.0186	0.2601	0.0024	243
<b>Total</b>	<b>4.86</b>	<b>7.82</b>	<b>0.39</b>	<b>0.86</b>	<b>0.01</b>	<b>919</b>

**Table C-19 (Concluded)  
Construction of Control Equipment or Replacement of an ICE – Equipment**

<b>Total Incremental Combustion Emissions from Construction Activities</b>							
<b>Sources</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day	
Daily Emissions	<b>22.3</b>	<b>52.5</b>	<b>2.7</b>	<b>6.4</b>	<b>0.048</b>	<b>4,483</b>	
Annual Emissions	<b>44.6</b>	<b>105</b>	<b>5.4</b>	<b>13</b>	<b>0.096</b>	<b>8,965</b>	

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>f</sup></b>	<b>PM10</b> lb/day	<b>PM2.5</b> lb/day
Combustion, Offroad	0.92	2.3	2.1
Combustion, Onroad	0.964	0.4	0.37
<b>Total, lb/project</b>		<b>2.7</b>	<b>2.5</b>
		<b>5.4</b>	<b>5.0</b>

**Notes:**

- a) SCAQMD, staff estimation
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.
- d) CARB, EMFAC2002 as summarized on SCAQMD website at [http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05\\_25.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls)
- e) Assumed haul truck travels 20 miles one-way
- f) ARB's CEIDARS database PM2.5 fractions - construction dust category for offroad and onroad diesel vehicle exhaust category for combustion.

**Table C-20  
Construction of Infrastructure or CEMS**

<b>Construction Activity</b> Internal Combustion Engine and Equipment Installation
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<b>Construction Schedule</b>	2 days		
<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>
Cranes	1	4.0	8
Rubber Tired Loaders	1	4.0	
Forklifts	1	4.0	
Welder	1	7.0	
Generator Sets	1	7.0	

<b>Construction Equipment Combustion Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Equipment Type<sup>c</sup></b>	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Cranes	0.637	1.695	0.075	0.188	0.001	128.7
Rubber Tired Loaders	0.555	1.382	0.077	0.173	0.001	108.6
Forklifts	0.250	0.643	0.035	0.086	0.001	54.4
Welders	0.234	0.319	0.030	0.092	0.000	25.6
Generator Sets	0.355	0.725	0.045	0.113	0.001	61.0

<b>Construction Vehicle (Mobile Source) Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
	lb/mile	lb/mile	lb/mile			lb/mile
Heavy-Duty Truck <sup>d</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.221844935
Passenger Vehicle	0.01155158	0.00121328	0.00008447	0.00118234	0.00001078	1.106722361



**Table C-20 (Continued)  
Construction of Infrastructure or CEMS**

<b>Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>One Way Trip Length (miles)</b>
Haul Trucks <sup>e</sup>	4	20
Worker Vehicles	8	10

<b>Incremental Increase in Onsite Idling Emissions from Onroad Mobile Vehicles</b>							
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)							
<b>Equipment Type</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO2 lb/day</b>	
Cranes	2.55	6.78	0.30	0.75	0.0	515	
Rubber Tired Loaders	2.22	5.53	0.31	0.69	0.0	434	
Forklifts	1.00	2.57	0.14	0.34	0.0	218	
Welder	1.64	2.23	0.21	0.64	0.0	179	
Generator Sets	2.48	5.07	0.31	0.79	0.0	427	
<b>Total</b>	<b>9.88</b>	<b>22.19</b>	<b>1.27</b>	<b>3.22</b>	<b>0.0</b>	<b>1,773</b>	

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>							
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)							
<b>Vehicle</b>	<b>CO lb/day</b>	<b>NOx lb/day</b>	<b>PM10 lb/day</b>	<b>VOC lb/day</b>	<b>SOx lb/day</b>	<b>CO lb/day</b>	
Flatbed Trucks	2.314	7.549	0.3694	0.5967	0.0063	675	
Worker Vehicles	1.848	0.194	0.0135	0.1892	0.0017	177	
<b>Total</b>	<b>4.16</b>	<b>7.74</b>	<b>0.38</b>	<b>0.79</b>	<b>0.01</b>	<b>853</b>	

**Table C-20 (Concluded)  
Construction of Infrastructure or CEMS**

<b>Total Incremental Combustion Emissions from Construction Activities</b>							
<b>Sources</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day	
Daily Emissions	14.0	29.9	1.7	4.0	0.028	2,625	
Annual Emissions	28.1	59.9	3.3	8.0	0.056	5,251	

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>f</sup></b>	<b>PM10</b> lb/day	<b>PM2.5</b> lb/day
Combustion, Offroad	0.92	1.3	1.2
Combustion, Onroad	0.964	0.4	0.37
Daily Emissions		<b>1.7</b>	<b>1.5</b>
Annual Emissions		<b>3.3</b>	<b>3.1</b>

**Notes:**

- a) SCAQMD, staff estimation
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.
- d) CARB, EMFAC2002 as summarized on SCAQMD website at [http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05\\_25.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls)
- e) Assumed haul truck travels 20 miles one-way
- f) ARB's CEIDARS database PM2.5 fractions - construction dust category for offroad and onroad diesel vehicle exhaust category for combustion.

**Table C-21  
Construction Miscellaneous**

<b>Construction Activity</b>						
Internal Combustion Engine and Equipment Installation						

<b>Construction Schedule</b>		1 day				
<b>Equipment Type<sup>a,b</sup></b>	<b>No. of Equipment</b>	<b>hr/day</b>	<b>Crew Size</b>			
Forklifts	1	4.0	4			

<b>Construction Equipment Combustion Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
<b>Equipment Type<sup>c</sup></b>	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Forklifts	0.250	0.643	0.035	0.086	0.001	54.4

<b>Construction Vehicle (Mobile Source) Emission Factors</b>						
	<b>CO</b>	<b>NOx</b>	<b>PM10</b>	<b>VOC</b>	<b>SOx</b>	<b>CO2</b>
	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Heavy-Duty Truck <sup>d</sup>	0.01446237	0.04718166	0.00230900	0.00372949	0.00003962	4.221844935
Passenger Vehicle	0.01155158	0.00121328	0.00008447	0.00118234	0.00001078	1.106722361

<b>On-Site Number of Trips and Trip Length</b>		
<b>Vehicle</b>	<b>No. of One-Way Trips/Day</b>	<b>One Way Trip Length (miles)</b>
Haul Trucks <sup>e</sup>	2	20
Worker Vehicles	4	10

**Table C-21 (Continued)  
Construction Miscellaneous**

<b>Incremental Increase in Onsite Idling Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lb/day)						
<b>Equipment Type</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day
Forklifts	1.00	2.57	0.14	0.34	0.002	218
<b>Total</b>	<b>1.00</b>	<b>2.57</b>	<b>0.14</b>	<b>0.34</b>	<b>0.002</b>	<b>218</b>

<b>Incremental Increase in Onsite Combustion Emissions from Onroad Mobile Vehicles</b>						
<b>Equation:</b> Emission Factor (lb/mile) x No. of One-Way Trips/Day x 2 x Trip length (mile) = Mobile Emissions (lb/day)						
<b>Vehicle</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day
Flatbed Trucks	1.157	3.775	0.1847	0.2984	0.0032	338
Worker Vehicles	0.924	0.097	0.0068	0.0946	0.0009	89
<b>Total</b>	<b>2.08</b>	<b>3.87</b>	<b>0.19</b>	<b>0.39</b>	<b>0.00</b>	<b>426</b>

<b>Total Incremental Combustion Emissions from Construction Activities</b>						
<b>Sources</b>	<b>CO</b> lb/day	<b>NOx</b> lb/day	<b>PM10</b> lb/day	<b>VOC</b> lb/day	<b>SOx</b> lb/day	<b>CO2</b> lb/day
Daily Emissions	<b>3.1</b>	<b>6.4</b>	<b>0.3</b>	<b>0.7</b>	<b>0.007</b>	<b>644</b>
Annual Emissions	<b>3.1</b>	<b>6.4</b>	<b>0.33</b>	<b>0.74</b>	<b>0.007</b>	<b>644</b>

<b>Combustion and Fugitive Summary</b>	<b>PM2.5 Fraction<sup>f</sup></b>	<b>PM10</b> lb/day	<b>PM2.5</b> lb/day
Combustion, Offroad	0.92	0.1	0.1
Combustion, Onroad	0.964	0.2	0.18
Daily Emissions		<b>0.33</b>	<b>0.31</b>
Annual Emissions		<b>0.33</b>	<b>0.31</b>

**Table C-21 (Concluded)  
Construction Miscellaneous**

**Notes:**

- a) SCAQMD, staff estimation
- b) Equipment name must match CARB Off-Road Model (see Off-Road Model EF worksheet) equipment name for sheet to look up EFs automatically.
- c) SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.
- d) CARB, EMFAC2002 as summarized on SCAQMD website at [http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05\\_25.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls)
- e) Assumed haul truck travels 20 miles one-way
- f) ARB's CEIDARS database PM2.5 fractions - construction dust category for offroad and onroad diesel vehicle exhaust category for combustion.

**Table C-22  
Offroad Emission Factors 2007**

<b>Equipment</b>	<b>CO lb/hr</b>	<b>NO<sub>x</sub> lb/hr</b>	<b>PM lb/hr</b>	<b>ROG lb/hr</b>	<b>SOX lb/hr</b>	<b>CO<sub>2</sub> lb/hr</b>	<b>Fuel Use, gal/hr</b>
Aerial Lifts	0.2253	0.4026	0.0279	0.0781	0.0004	34.7	
Air Compressors	0.3872	0.8302	0.0579	0.1285	0.0007	63.6	
Bore/Drill Rigs	0.5388	1.4734	0.0648	0.1457	0.0017	165.0	
Cement and Mortar Mixers	0.0455	0.0693	0.0050	0.0120	0.0001	7.2	0.33
Concrete/Industrial Saws	0.4487	0.7639	0.0640	0.1561	0.0007	58.5	
Cranes	0.6365	1.6948	0.0755	0.1882	0.0014	128.7	9.82
Crawler Tractors	0.7090	1.6218	0.0988	0.2180	0.0013	114.0	
Crushing/Proc. Equipment	0.7817	1.6553	0.1048	0.2499	0.0015	132.3	
Dumpers/Tenders	0.0383	0.0709	0.0049	0.0137	0.0001	7.6	
Excavators	0.5977	1.4225	0.0776	0.1816	0.0013	119.6	
Forklifts	0.2495	0.6430	0.0346	0.0861	0.0006	54.4	2.48
Generator Sets	0.3549	0.7249	0.0446	0.1130	0.0007	61.0	2.79
Graders	0.6712	1.7198	0.0886	0.2055	0.0015	132.7	6.06
Off-Highway Tractors	0.9270	2.2742	0.1107	0.2692	0.0017	151.5	
Off-Highway Trucks	0.9133	2.9144	0.1056	0.2881	0.0027	260.1	
Other Construction Equipment	0.4749	1.2411	0.0539	0.1311	0.0013	122.8	
Other General Industrial Equipmen	0.6987	1.9012	0.0850	0.2111	0.0016	152.2	
Other Material Handling Equipment	0.6298	1.8362	0.0819	0.2038	0.0015	141.2	
Pavers	0.6000	1.1291	0.0799	0.2062	0.0009	77.9	3.59
Paving Equipment	0.4693	1.0333	0.0708	0.1556	0.0008	69.0	3.16
Plate Compactors	0.0263	0.0351	0.0025	0.0054	0.0001	4.3	
Pressure Washers	0.0705	0.1079	0.0081	0.0235	0.0001	9.4	
Pumps	0.3243	0.6224	0.0439	0.1090	0.0006	49.6	
Rollers	0.4419	0.9073	0.0629	0.1410	0.0008	67.1	3.07
Rough Terrain Forklifts	0.4928	0.9631	0.0800	0.1576	0.0008	70.3	
Rubber Tired Dozers	1.6950	3.4143	0.1474	0.3789	0.0025	239.1	
Rubber Tired Loaders	0.5552	1.3821	0.0768	0.1730	0.0012	108.6	5.06
Scrapers	1.5249	3.3991	0.1465	0.3677	0.0027	262.5	10.74
Signal Boards	0.0972	0.1806	0.0115	0.0254	0.0002	16.7	
Skid Steer Loaders	0.2735	0.3375	0.0326	0.0981	0.0004	30.3	
Surfacing Equipment	0.7654	1.8498	0.0712	0.1864	0.0017	166.0	
Sweepers/Scrubbers	0.5672	1.0277	0.0819	0.1963	0.0009	78.5	
Tractors/Loaders/Backhoes	0.4142	0.8303	0.0639	0.1307	0.0008	66.8	3.41
Trenchers	0.5171	0.8578	0.0714	0.1942	0.0007	58.7	
Welders	0.2336	0.3191	0.0297	0.0917	0.0003	25.6	

SCAB values provided by the ARB, May 2007. Assumed equipment is diesel fueled.

**Table C-23  
2008 Construction Emissions**

**SCR**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
Infrastructure	240	3	42.1	89.8	5.0	12.0	0.083	4.6	1,260,225
<b>Total</b>	<b>240</b>	<b>3</b>	<b>42.1</b>	<b>89.8</b>	<b>5.0</b>	<b>12.0</b>	<b>0.083</b>	<b>4.6</b>	<b>1,260,225</b>

**Table C-24  
2009 Construction Emissions**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
CEMS	4	1	14.0	29.9	1.7	4.0	0.028	1.5	21,004
AFRC and CO analyzer	16	1	3.1	6.4	0.3	0.7	0.007	0.31	10,302
Electric Motor	4	1	22.3	52.5	2.7	6.4	0.048	2.5	41710
<b>Total</b>	<b>24</b>	<b>3</b>	<b>39.5</b>	<b>88.9</b>	<b>4.7</b>	<b>11.1</b>	<b>0.082</b>	<b>4.4</b>	<b>73,016</b>

**Table C-25  
2010 Construction Emissions**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
Ox Cat or Update	20	1	22.3	52.5	2.7	6.4	0.048	2.5	208,551
CEMS	10	1	14.0	29.9	1.7	4.0	0.028	1.5	52,509
AFRC and CO analyzer	15	1	3.1	6.4	0.3	0.7	0.007	0.3	9,658
Electric Motor	13	1	22.3	52.5	2.7	6.4	0.048	2.5	135,558
<b>Total</b>	<b>58</b>	<b>4</b>	<b>61.8</b>	<b>141</b>	<b>7.4</b>	<b>17.6</b>	<b>0.130</b>	<b>6.9</b>	<b>406,277</b>

**Table C-26  
2011 Construction Emissions**

**SCR**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
SCR	14	1	22.3	52.5	2.7	6.4	0.048	2.5	145,986
Ox Cat or Update	32	1	22.3	52.5	2.7	6.4	0.048	2.5	333,682
CEMS	10	1	14.0	29.9	1.7	4.0	0.028	1.5	52,509
CO Analyzer	5	1	3.1	6.4	0.33	0.74	0.007	0.31	3,219
Electric Motor	88	2	44.6	105	5.4	13	0.096	5.0	917,624
<b>Total</b>	<b>149</b>	<b>6</b>	<b>106</b>	<b>247</b>	<b>12.9</b>	<b>30.4</b>	<b>0.23</b>	<b>11.9</b>	<b>1,453,020</b>

**Gas Turbine or Microturbine**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
Gas Turbine or Microturbine	14	1	22.3	52.5	2.7	6.4	0.05	2.5	145,986
Ox Cat or Update	32	1	22.3	52.5	2.7	6.4	0.05	2.5	333,682
CEMS	10	1	14.0	29.9	1.7	4.0	0.03	1.5	52,509
CO Analyzer	5	1	3.1	6.4	0.33	0.74	0.01	0.31	3,219
Electric Motor	88	2	45	105	5.4	12.8	0.10	5.0	917,624
<b>Total</b>	<b>149</b>	<b>6</b>	<b>106.4</b>	<b>246.5</b>	<b>12.9</b>	<b>30.4</b>	<b>0.23</b>	<b>11.9</b>	<b>1,453,020</b>

**Gas Turbine or Microturbine and LNG Plant**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
LNG Plant	6	7	184	436	35.6	54	0.38	24	3,352,270
Gas Turbine or Microturbine	8	1	22.3	52.5	2.7	6.4	0.048	2.5	83,420
Ox Cat or Update	32	1	22.3	52.5	2.7	6.4	0.048	2.5	333,682
CEMS	10	1	14.0	29.9	1.7	4.0	0.028	1.5	52,509
CO Analyzer	5	1	3.1	6.4	0.33	0.74	0.007	0.31	3,219
Electric Motor	88	2	44.6	105	5.4	12.8	0.10	5.0	917,624
<b>Total</b>	<b>149</b>	<b>13</b>	<b>291</b>	<b>682</b>	<b>48.4</b>	<b>84.1</b>	<b>0.60</b>	<b>35.6</b>	<b>4,742,725</b>



**Table C-27  
2012 Construction Emissions**

**SCR**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
SCR	14	1	22.3	52.5	2.7	6.4	0.048	2.5	145,986
<b>Total</b>	<b>14</b>	<b>1</b>	<b>22.3</b>	<b>52.5</b>	<b>2.7</b>	<b>6.4</b>	<b>0.048</b>	<b>2.5</b>	<b>145,986</b>

**Gas Turbine or Microturbine**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
Gas Turbine or Microturbine	14	1	22.3	52.5	2.7	6.4	0.048	2.5	145,986
<b>Total</b>	<b>14</b>	<b>1</b>	<b>22.3</b>	<b>52.5</b>	<b>2.7</b>	<b>6.4</b>	<b>0.048</b>	<b>2.5</b>	<b>145,986</b>

**Gas Turbine or Microturbine and LNG Plant**

Description	Annual No of Facilities	Daily No of Facilities	CO, lb/day	NOx, lb/day	PM10, lb/day	VOC, lb/day	SOx, lb/day	PM2.5, lb/day	CO2, lb/year
LNG Plant	6	7	184	436	35.6	53.8	0.38	23.7	3,352,270
Gas Turbine or Microturbine	8	1	22.3	52.5	2.7	6.4	0.048	2.5	83,420
<b>Total</b>	<b>14</b>	<b>8</b>	<b>207</b>	<b>488</b>	<b>38.3</b>	<b>60.2</b>	<b>0.43</b>	<b>26.2</b>	<b>3,435,691</b>

**Table C-28  
2008 Construction Vehicle Travel**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project
Infrastructure	240	3	160	160	320	320	480	480	76,800	76,800
<b>Total</b>	<b>240</b>	<b>3</b>	<b>160</b>	<b>160</b>	<b>320</b>	<b>320</b>	<b>480</b>	<b>480</b>	<b>76,800</b>	<b>76,800</b>

**Table C-29  
2009 Construction Vehicle Travel**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project
CEMS	4	1	160	160	320	320	160	160	1,280	1,280
AFRC and CO analyzer	16	1	80	80	80	80	80	80	1,280	1,280
Electric Motor	4	1	160	220	400	27	160	220	1,600	108
Total	24	3	880	1060	1920	801	400	460	4,160	2,668

**Table C-30  
2010 Construction Vehicle Travel**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project
Ox Cat or Update	20	1	160	220	400	27	160	220	3200	4400
CEMS	10	1	160	160	320	320	160	160	1600	1600
AFRC and CO analyzer	15	1	80	80	80	80	80	80	1200	1200
Electric Motor	13	1	160	220	400	27	160	220	2080	2860
Total	58	4	880	1,060	1,920	801	560	680	8,080	10,060

**Table C-31  
2011 Construction Vehicle Travel**

**SCR**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project
SCR	14	1	160	220	400	27	160	220	5,600	378
Ox Cat or Update	32	1	160	220	400	27	160	220	12,800	864
CEMS	10	1	160	160	320	320	160	160	3,200	3,200
CO Analyzer	5	1	80	80	80	80	80	80	400	400
Electric Motor	88	2	160	220	400	27	320	440	35,200	2,376
Total	149	6	720	900	1600	481	880	1120	57,200	7,218

**Gas Turbine or Microturbine**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/project	Total Worker, mile/project
Gas Turbine or Microturbine	15	1	160	220	400	27	160	220	6,000	405
Ox Cat or Update	15	1	160	220	400	27	160	220	6,000	405
CEMS	2	1	160	160	320	320	160	160	640	640
Electric Motor	118	2	160	220	400	27	320	440	47,200	3,186
Total	150	5	640	820	1,520	401	800	1,040	59,840	4,636

**Table C-31 (Concluded)  
2011 Construction Vehicle Travel**

**Gas Turbine or Microturbine and LNG Plant**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project
LNG Plant	6	7	547	300	18,800	270	3,830	2,100	112,800	1,620
Gas Turbine or Microturbine	8	1	160	220	400	27	160	220	3,200	216
Ox Cat or Update	32	1	160	220	400	27	160	220	12,800	864
CEMS	10	1	160	160	320	320	160	160	3,200	3,200
CO Analyzer	5	1	80	80	80	80	80	80	400	400
Electric Motor	88	2	160	220	400	27	320	440	35,200	2,376
Total	149	13	1267.2	1200	20400	751	4710.4	3220	167,600	8,676

**Table C-32  
2012 Construction Vehicle Travel**

**SCR**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project
SCR	14	1	160	220	400	27	160	220	5,600	378
Total	14	1	160	220	400	27	160	220	5600	378

**Gas Turbine or Microturbine**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project
Gas Turbine or Microturbine	14	1	160	220	400	27	160	220	5,600	378
Total	14	1	160	220	400	27	160	220	5600	378

**Table C-32 (Concluded)  
2012 Construction Vehicle Travel**

**Gas Turbine or Microturbine and LNG Plant**

Description	Annual No of Facilities	Daily No of Facilities	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project	Daily HHD Distance, mile/day	Daily Worker, mile/day	Total HHD Distance, mile/ project	Total Worker, mile/ project
LNG Plant	6	7	547	300	18,800	270	3,830	2,100	112,800	1,620
Gas Turbine or Microturbine	8	1	160	220	15,280	27	160	220	122,240	216
Total	14	8	707.2	520	34080	297	3990.4	2320	235040	1836

**Table C-33  
EMFAC2007 Emission Factors for 2007**

Description	NOx, lb/mile	CO, lb/mile	VOC, lb/mile	SOx, lb/mile	PM10, lb/mile	CO2, lb/mile
Heavy-Duty Truck <sup>a</sup>	0.04718	0.01446	0.00373	0.00004	0.00231	4.222

CARB, EMFAC2002 as summarized on SCAQMD website at [http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHD05\\_25.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHD05_25.xls)

**Table C-34  
Summary of Construction Emissions**

**SCR-Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5, lb/day	CO2, ton/year
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	247	106	30.4	0.23	12.9	11.9	727
<b>2012</b>	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Table C-34 (Concluded)**  
**Summary of Construction Emissions**

**Gas Turbines or Microturbines - Construction**

<b>Description</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5, lb/day</b>	<b>CO2, ton/year</b>
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	247	106	30.4	0.23	12.9	11.9	727
<b>2012</b>	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Gas Turbines/LNG - Construction**

<b>Description</b>	<b>NOx, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SOx, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5, lb/day</b>	<b>CO2, ton/year</b>
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	682	291	84.1	0.60	48.4	35.6	2,371
<b>2012</b>	488	206.6	60.2	0.43	38.3	26.2	1,718

**Table C-35**  
**Summary of Total Proposed Project Emissions**

**SCR - Total**

<b>Description</b>	<b>NO<sub>x</sub>, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SO<sub>x</sub>, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5 lb/day</b>	<b>CO<sub>2</sub>, ton/year</b>
<b>2008</b>	9,089	53,909	2,470	544	877	875	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	17,357	1,298	534	844	842	1,208,074
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,591	13,581	1,237	529	834	831	1,197,378
	<u>5,596</u>	<u>13,614</u>	<u>1,246</u>	<u>530</u>	<u>835</u>	<u>832</u>	
<b>2012</b>	4,178	13,445	1,017	538	833	831	1,231,668
<b>2014</b>	4,184	13,441	1,015	538	833	831	1,231,622

**Gas Turbines - Total**

<b>Description</b>	<b>NO<sub>x</sub>, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SO<sub>x</sub>, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5 lb/day</b>	<b>CO<sub>2</sub>, ton/year</b>
<b>2008</b>	9,089	53,909	2,470	544	877	875	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	17,357	1,298	534	844	842	1,208,074
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,586	13,579	1,237	529	833	831	1,197,447
	<u>5,591</u>	<u>13,612</u>	<u>1,246</u>	<u>530</u>	<u>834</u>	<u>832</u>	
<b>2012</b>	4,878	7,380	539	538	1,019	1,017	1,231,344
<b>2014</b>	4,884	7,375	537	538	1,019	1,017	1,231,271

**Table C-35 (Continued)**  
**Summary of Total Proposed Project Emissions**

**Microturbines - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
2008	9,089	53,909	2,470	544	877	875	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
2009	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
2010	5,964	17,357	1,298	534	844	842	1,208,074
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>	
2011	5,586	13,579	1,237	529	833	831	1,197,447
	<u>5,591</u>	<u>13,612</u>	<u>1,246</u>	<u>530</u>	<u>834</u>	<u>832</u>	
2012	3,913	6,192	644	538	760	758	1,231,458
2014	3,919	6,187	643	538	760	758	1,231,385

**Gas Turbines/LNG - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
2008	9,089	53,909	2,470	544	877	875	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
2009	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
2010	5,964	17,357	1,298	534	844	842	1,208,074
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>	
2011	6,072	13,779	1,295	529	872	857	1,199,341
	<u>6,077</u>	<u>13,812</u>	<u>1,304</u>	<u>530</u>	<u>873</u>	<u>858</u>	
2012	4,742	6,710	584	211	911	896	1,094,941
2014	4,373	6,540	533	211	878	876	1,093,551



**Table C-35 (Concluded)**  
**Summary of Total Proposed Project Emissions**

**Microturbines/LNG - Total**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
2008	9,089	53,909	2,470	544	877	875	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
2009	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
2010	5,964	17,357	1,298	534	844	842	1,208,074
	<u>5,969</u>	<u>17,390</u>	<u>1,307</u>	<u>535</u>	<u>845</u>	<u>843</u>	
2011	6,072	13,779	1,295	529	872	857	1,199,341
	<u>6,077</u>	<u>13,812</u>	<u>1,304</u>	<u>530</u>	<u>873</u>	<u>858</u>	
2012	4,358	6,245	629	211	805	791	1,095,049
2014	3,989	6,075	578	211	773	771	1,093,659

**Table C-36**  
**Summary of Emissions and Emission Reductions from PAR 1110.2**

**SCR - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
2008	(106)	(334)	(23)	(7.4)	0.1	0.4	(22,186)
	<u>(100)</u>	<u>(301)</u>	<u>(14)</u>	<u>(6.8)</u>	<u>1.0</u>	<u>0.7</u>	
2009	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)	(41,973)
	<u>(3,225)</u>	<u>(36,853)</u>	<u>(1,186)</u>	<u>(17)</u>	<u>(32)</u>	<u>(32)</u>	
2010	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)	(41,973)
	<u>(3,225)</u>	<u>(36,853)</u>	<u>(1,186)</u>	<u>(17)</u>	<u>(32)</u>	<u>(32)</u>	
2011	(3,603)	(40,662)	(1,256)	(23)	(43)	(44)	(52,669)
	<u>(3,598)</u>	<u>(40,629)</u>	<u>(1,247)</u>	<u>(22)</u>	<u>(42)</u>	<u>(43)</u>	
2012	(5,017)	(40,798)	(1,476)	(13)	(44)	(44)	(18,379)
2014	(5,011)	(40,802)	(1,477)	(13)	(44)	(44)	(18,425)

**Table C-36 (Continued)**  
**Summary of Emissions and Emission Reductions from PAR 1110.2**

**Gas Turbines - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(23)	(7.5)	0.1	0.4	(22,186)
	(100)	(301)	(14)	(6.8)	1.0	0.7	
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2010</b>	(3,231)	(36,886)	(1,195)	(18)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2011</b>	(3,609)	(40,664)	(1,256)	(23)	(43)	(44)	(52,600)
	(3,603)	(40,631)	(1,247)	(22)	(43)	(43)	
<b>2012</b>	(4,317)	(46,863)	(1,954)	(13)	142	142	(18,703)
<b>2014</b>	(4,311)	(46,868)	(1,955)	(13)	142	142	(18,776)

**Microturbines - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4	(22,186)
	(100)	(301)	(14)	(6.9)	0.8	0.4	
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2010</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2011</b>	(3,609)	(40,664)	(1,256)	(23)	(43)	(44)	(52,600)
	(3,603)	(40,631)	(1,247)	(22)	(43)	(43)	
<b>2012</b>	(5,282)	(48,051)	(1,848)	(13)	(117)	(117)	(18,589)
<b>2014</b>	(5,275)	(48,056)	(1,850)	(13)	(117)	(117)	(18,662)

**Table C-36 (Concluded)**  
**Summary of Emissions and Emission Reductions from PAR 1110.2**

**Gas Turbines/LNG - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4	(22,186)
	(100)	(301)	(14)	(6.9)	0.8	0.4	
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2010</b>	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2011</b>	(3,123)	(40,464)	(1,198)	(22)	(5)	(18)	(50,706)
	(3,117)	(40,431)	(1,189)	(22)	(4)	(17)	
<b>2012</b>	(4,453)	(47,533)	(1,909)	(340)	33.7	21.3	(155,106)
<b>2014</b>	(4,821)	(47,703)	(1,960)	(340)	1.2	0.75	(156,496)

**Microturbines/LNG - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4	(22,186)
	(100)	(301)	(14)	(6.9)	0.8	0.4	
<b>2009</b>	(3,231)	(36,886)	(1,194)	(18)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2010</b>	(3,231)	(36,886)	(1,195)	(17)	(33)	(33)	(41,973)
	(3,225)	(36,853)	(1,186)	(17)	(32)	(32)	
<b>2011</b>	(3,123)	(40,464)	(1,198)	(22)	(5)	(18)	(50,706)
	(3,117)	(40,431)	(1,189)	(22)	(4)	(17)	
<b>2012</b>	(4,837)	(47,998)	(1,864)	(340)	(72)	(84)	(154,998)
<b>2014</b>	(5,205)	(48,168)	(1,914)	(340)	(104)	(104)	(156,387)

**Table C-37**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for PAR 1110.2 to Be Carbon Neutral**

**SCR - Carbon Neutral Calculation**

Description	Proposed Project CO2, ton/year	No Electrification CO2, ton/year	Reduction in CO2 from Electrification	Average CO2 Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,973)	(23,358)	18,614		
<b>2010</b>	(41,973)	(23,358)	18,614		
<b>2011</b>	(52,669)	(21,974)	30,695		
<b>2012</b>	(18,379)	11,559	29,938		
<b>2014</b>	(18,425)	11,513	29,938		
<b>2013-2018</b>	(110,549)	69,081	179,630		
<b>10 year total</b>	(265,542)	11,950	277,492	1,642	8

**Gas Turbines - Carbon Neutral Calculation**

Description	Proposed Project CO2, ton/year	No Electrification CO2, ton/year	Reduction in CO2 from Electrification	Avg CO2 Savings per Motor	Avg No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,181)	5		
<b>2009</b>	121,080	(23,358)	18,614		
<b>2010</b>	(41,973)	(23,358)	18,614		
<b>2011</b>	(52,600)	(21,905)	30,695		
<b>2012</b>	(18,703)	11,236	29,938		
<b>2014</b>	(18,776)	11,163	29,938		
<b>2013-2018</b>	(112,654)	66,976	179,630		
<b>10 year total</b>	(104,849)	9,591	114,439	677	15

**Table C-37 (Continued)**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for PAR 1110.2 to Be Carbon Neutral**

**Microturbines - Carbon Neutral Calculation**

Description	Proposed Project CO2, ton/year	No Electrification CO2, ton/year	Reduction in CO2 from Electrification	Average CO2 Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,181)	5		
<b>2009</b>	(41,973)	(23,358)	18,614		
<b>2010</b>	(41,973)	(23,358)	18,614		
<b>2011</b>	(52,600)	(21,905)	30,695		
<b>2012</b>	(18,589)	11,350	29,938		
<b>2014</b>	(18,662)	11,277	29,938		
<b>2013-2018</b>	(111,970)	67,660	179,630		
<b>10 year total</b>	(267,103)	10,389	277,492	1,642	7

**Gas Turbines/LNG - Carbon Neutral Calculation**

Description	Proposed Project CO2, ton/year	No Electrification CO2, ton/year	Reduction in CO2 from Electrification	Avg CO2 Savings per Motor	Avg No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,181)	5		
<b>2009</b>	(41,973)	(23,358)	18,614		
<b>2010</b>	(41,973)	(23,358)	18,614		
<b>2011</b>	(50,706)	(20,011)	30,695		
<b>2012</b>	(155,106)	(125,168)	29,938		
<b>2014</b>	(156,496)	(126,558)	29,938		
<b>2013-2018</b>	(938,975)	(759,345)	179,630		
<b>10 year total</b>	(1,228,732)	(951,240)	277,492	1,642	0

**Table C-37 (Concluded)**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for PAR 1110.2 to Be Carbon Neutral**

**Microturbines/LNG - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Avg CO <sub>2</sub> Savings per Motor	Avg No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,181)	5		
<b>2009</b>	(41,973)	(23,358)	18,614		
<b>2010</b>	(41,973)	(23,358)	18,614		
<b>2011</b>	(50,706)	(20,011)	30,695		
<b>2012</b>	(154,998)	(125,059)	29,938		
<b>2014</b>	(156,387)	(126,449)	29,938		
<b>2013-2018</b>	(938,325)	(758,695)	179,630		
<b>10 year total</b>	(1,227,973)	(950,481)	277,492	1,642	0

Project CO<sub>2</sub> emissions begin with the adoption of the rule.

Electric engines would be installed between 2009 and 2011. Electric motor useful life was assumed to be 10 years. The electric motor useful life was assumed to start in 2009. CO<sub>2</sub> emissions were not estimated for 2013. The emissions for 2013 are assumed to be equivalent to 2014. This is conservative because in 2013 the catalyst disposal and replacement would not start until 2014, which adds diesel haul truck emissions.

**Table C-38**  
**Summary of the Number of Electric Motor Replacements of Non-Biogas Engines Required for PAR 1110.2 to Be Carbon Neutral**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
SCR	(270,810)	11,981	282,791	1,673	8
Replace ICE with Gas Turbine	(104,849)	9,591	114,439	677	15
Replace ICE Microturbine	(267,103)	10,389	277,492	1,642	7
Replace LFG w LNG, DG w Turbines	(1,228,732)	(951,240)	277,492	1,642	0
Replace LFG w LNG, DG w Microturbines	(1,227,973)	(950,481)	277,492	1,642	0

SCAQMD staff estimates that there are 225 non-biogas engines where replacing the non-biogas engines with electric motors would cost less than complying with PAR 1110.2.

The proposed project assumes that 75 percent of existing non-biogas ICEs (169) would be replaced with electrification where cost would be lower than complying with PAR 1110.2.

**Table C-39**  
**Adverse Electricity Impacts from Differences in Efficiency Between ICE Alternatives and LNG Reliance on the Power Grid**

Description	Electricity Production, MWH/yr	Electricity Consumption, MWH/yr	Total Electricity, MWH/yr	Electricity Change from Baseline, MWH/yr
2005 Baseline (ICE)	437,214		437,214	
SCR	435,509		435,509	1,706
Gas Turbines	380,053		380,053	57,161
Microturbines	336,201		336,201	101,013
Gas Turbines/LNG	155,746	104,694	51,052	386,162
Microturbines/LNG	137,706	104,694	33,081	404,133

ICEs, gas turbines, and microturbines generate electricity.

LNG plants would not generate electricity, but would require energy from the power grid.

**Table C-40**  
**Adverse Electricity Impacts**

Description	Non-Biogas and Biogas CEMS and Controllers, MWH/Yr	Non-Biogas Electrification, MWH/Yr	Electricity Production, MWH/yr	Electricity Totals, MWH/yr	Electricity Change from Baseline, MWH/yr
2005 Baseline			437,214	437,214	0
SCR	(567)	(171,827)	435,509	263,114	(174,100)
Gas Turbines	(567)	(171,827)	380,053	207,659	(229,556)
Micro Turbines	(567)	(171,827)	336,201	163,807	(273,408)
Gas Turbines/LNG	(567)	(171,827)	51,052	(121,342)	(558,557)
Microturbines/LNG	(567)	(171,827)	33,081	(139,313)	(576,527)

Negative values are presented in parenthesis. Negative electricity values represent consumption, positive values represent production.

**Table C-41**  
**Adverse Natural Gas Impacts from Reduction of Natural Gas Usage to 10 Percent**

Year	Baseline Natural Gas Usage, MMBtu/ year	2008 Natural Gas Reduction, MMBtu/ year	2010 Natural Gas Reduction, MMBtu/ year
2008	4,061,047	162,928	77,761
2010	4,964,605	199,179	95,063

**Table C-42  
Diesel Fuel Use from Truck Trips Associated with PAR 1110.2**

<b>Natural Gas Reduction from ICE Replacement with Electric Motors, MMBtu/year</b>	<b>Power Plants, MMBtu/year</b>	<b>Emergency ICE, MMBtu/year</b>	<b>Electrification Natural Gas Consumption, MMBtu/year</b>
(1,854,358)	1,303,214	2,283	(548,862)

Values in parenthesis are negative. Reduction in natural gas use is negative, consumption is positive

**Table C-43  
Adverse Natural Gas Impacts**

<b>Description</b>	<b>Catalyst Pressure Drop Consumption, MMBtu/yr</b>	<b>Non-biogas Electrification Natural Gas Consumption, MMBtu/yr</b>	<b>Biogas Emergency Engines Natural Gas, MMBtu/yr</b>	<b>Power Plant Natural Gas, MMBtu/Yr</b>	<b>Biogas Natural Gas Consumption, MMBtu/yr</b>	<b>Non-biogas Natural Gas Consumption, MMBtu/yr</b>	<b>Natural Gas Total, MMBtu/yr</b>	<b>Natural Gas Change from Baseline, MMBtu/yr</b>
Baseline					512,787	10,501,630	11,014,417	
SCR	2,713	(548,862)		1,751	512,787	10,501,630	10,470,019	(544,398)
Gas Turbines	2,713	(548,862)	3,318	68,793	512,787	10,501,630	10,540,378	(474,039)
Micro Turbines	2,713	(548,862)	5,023	112,645	512,787	10,501,630	10,585,936	(428,481)
Gas Turbines/LNG	2,713	(548,862)	3,318	397,794	456,430	10,501,630	10,813,022	(201,395)
Microturbines/LNG	2,713	(548,862)	5,023	415,764	456,430	10,501,630	10,832,698	(181,719)

Values in parenthesis are negative. Reduction in natural gas use is negative, consumption is positive



Table C-44

**Diesel Fuel Use from Truck Trips Associated with Non-biogas and the SCR Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24	267	9	0	300
2009	20	279	6	65	370
2010	28	373	54	760	1,214
2011	44	653	63	1,111	1,871
2012	8	141	86	1,111	1,346
2014	0	0	149	1,111	1,260
Max	44	653	149	1,111	1,957

HHDT = Heavy – heavy- duty truck

Table C-45

**Diesel Fuel Use from Truck Trips Associated with Non-biogas and the Gas Turbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Non-Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24	267	9	0	0	300
2009	20	367	6	65	0	458
2010	28	373	54	760	0	1,214
2011	44	653	57	1,111	0	1,865
2012	8	141	86	1,111	0	1,346
2014	0	0	149	1,111	140	1,399
Max	44	653	149	1,111	140	1,865

HHDT = Heavy – heavy- duty truck

Table C-46

**Diesel Fuel Use from Truck Trips Associated with Non-biogas and the Microturbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Non-Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24.0	267	9.0	0	0	300
2009	20.0	367	6.0	65	0	458
2010	28.0	373	53.6	760	0	1,214
2011	44.0	653	56.6	1,111	0	1,865
2012	8.0	141	86.4	1,111	0	1,346
2014	0.0	0	149	1,111	202	148.8
Max	44	653	149	1,111	202	1,865

HHDT = Heavy – heavy- duty truck

**Table C-47**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas and the LNG and Gas Turbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Non-Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24	267	9	0	0	300
2009	20	279	6	65	0	370
2010	28	373	54	760	0	1,214
2011	236	1,761	111	1,111	0	3,218
2012	200	1,249	154	1,111	0	2,714
2014	0	0	281	1,111	140	1,531
Max	236	1,761	281	1,111	140	3,218

HHDT = Heavy – heavy- duty truck

**Table C-48**  
**Diesel Fuel Use from Truck Trips Associated with Non-biogas and the LNG and Microturbine Biogas Compliance Option**

Year	Daily HHD Consumption Construction, gal/day	Diesel Construction Equipment, gal/day	Daily HHD Consumption Operational gal/day	Non-Biogas Emergency Engines, gal/day	Non-Biogas Emergency Engines, gal/day	Daily Consumption, gal/day
2008	24.0	267	9.0	0	0	300
2009	20.0	279	6.0	65	0	370
2010	28.0	373	53.6	760	0	1,214
2011	236	1,761	111	1,111	0	3,218
2012	200	1,249	154	1,111	0	2,714
2014	0.0	0	281	1,111	202	1,593
Max	236	1,761	281	1,111	202	3,218

HHDT = Heavy – heavy- duty truck

**Table C-49**  
**Summary of Energy Effects Non-Biogas Effects**

Natural Gas Consumption, MMBtu/Yr	Electricity Consumption, MWH/Yr	Diesel Fuel Consumption, Gal/Yr
(551,144,402,851)	172,394	55,536

**Table C-50  
Summary PAR 1110.2 Energy Effects Compared to Baseline**

Description	Natural Gas Consumption, MMBtu/yr	Electricity Production, MWH/yr	Shaft Work Produced, Hp-Hrs/yr	Diesel Fuel Consumption, gal/yr	LNG Production, MMBtu/yr
SCR	(544,398)	174,100	(59,006)	31,152	
Gas Turbines	(474,039)	229,556	(15,123,937)	38,128	
Micro Turbines	(428,481)	273,408	(15,123,937)	41,241	
Gas Turbines/LNG	(201,395)	558,557	(15,123,937)	38,128	2,374,019
Microturbines/LNG	(181,719)	576,527	(15,123,937)	57,364	2,374,019

**Table C-51  
Example ISCST3 File for Ammonia Slip Emissions**

```

**
*****
**
** ISCST3 Input Produced by:
** ISC-AERMOD View Ver. 5.6.0
** Lakes Environmental Software Inc.
** Date: 8/14/2007
**
*****
**
**
*****
** ISCST3 Control Pathway
*****
**
**
CO STARTING
  TITLEONE
  TITLETWO
  MODELOPT CONC URBAN NOCALM
  AVERTIME 1 PERIOD
  POLLUTID OTHER
  TERRHGTS ELEV
  RUNORNOT RUN
CO FINISHED
**
*****
** ISCST3 Source Pathway
*****
**
**
SO STARTING
  ELEVUNIT FEET
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
  LOCATION S008 POINT 412935.000 3728400.900 23.000
  LOCATION S009 POINT 412942.100 3728391.300 23.000
** Source Parameters **
  SRCPARAM S008 1 18.902 533.150 17.88100 0.762
  SRCPARAM S009 1 18.902 533.150 17.88100 0.762
    
```

**Table C-51 (Continued)  
Example ISCST3 File for Ammonia Slip Emissions**

```

** Building Downwash **
BUILDHGT S008    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S008    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S008    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S008    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S008    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S008    14.20  14.20  14.20  14.20  14.20  14.20

BUILDHGT S009    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S009    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S009    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S009    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S009    14.20  14.20  14.20  14.20  14.20  14.20
BUILDHGT S009    14.20  14.20  14.20  14.20  14.20  14.20

BUILDWID S008    52.26  49.64  45.77  42.62  38.96  40.98
BUILDWID S008    44.94  47.54  48.70  48.38  49.33  49.07
BUILDWID S008    47.31  45.00  46.81  50.53  52.72  53.30
BUILDWID S008    52.26  49.64  45.77  42.62  38.96  40.98
BUILDWID S008    44.94  47.54  48.70  48.38  49.33  49.07
BUILDWID S008    47.31  45.00  46.81  50.53  52.72  53.30

BUILDWID S009    52.26  49.64  45.77  42.62  38.96  40.98
BUILDWID S009    44.94  47.54  48.70  48.38  49.33  49.07
BUILDWID S009    47.31  45.00  46.81  50.53  52.72  53.30
BUILDWID S009    52.26  49.64  45.77  42.62  38.96  40.98
BUILDWID S009    44.94  47.54  48.70  48.38  49.33  49.07
BUILDWID S009    47.31  45.00  46.81  50.53  52.72  53.30
    
```

```

SRCGROUP S008 S008
SRCGROUP S009 S009
SRCGROUP ALL
    
```

SO FINISHED

```

**
*****
    
```

\*\* ISCST3 Receptor Pathway

```

*****
**
**
    
```

RE STARTING

ELEVUNIT FEET

```

** DESCRREC "" ""
DISCCART 412572.90 3727853.70 19.70
DISCCART 412622.90 3727853.70 19.70
DISCCART 412672.90 3727853.70 19.70
    
```

\*\*The receptor list is abbreviated for space. A full list of the receptors is available upon request.

RE FINISHED

```

**
*****
** ISCST3 Meteorology Pathway
*****
    
```

**Table C-51 (Concluded)  
Example ISCST3 File for Ammonia Slip Emissions**

```

**
**
ME STARTING
  INPUTFIL C:\metdata\COSMESA.ASC
  ANEMHGHT 10 METERS
  SURFDATA 53126 1981
  UAIRDATA 91919 1981
ME FINISHED
**
*****
** ISCST3 Output Pathway
*****
**
**
OU STARTING
  RECTABLE ALLAVE 1ST
  RECTABLE 1 1ST
** Auto-Generated Plotfiles
** Plotfile Path: C:\Lakes\ISC-AERMODView\Projects\2007\PAR1110_2\OCSD1.IS\
  PLOTFILE 1 ALL 1ST OCSD1.IS\01H1GALL.PLT
  PLOTFILE PERIOD ALL OCSD1.IS\PE00GALL.PLT
OU FINISHED

```

**Table C-52  
Summary of Diesel Exhaust Emissions from Biogas Emergency Engines**

Facility ID No.	Diesel PM, ton/year
29110	0.0186142
17301	0.0078784
9961	0.0022837
9163	0.0020946
001703	0.0019239
135216	0.0012418
3866	0.0011543
13088	0.000726
13433	0.0007106
11301	0.0006434
019159	0.0004719
1179	0.00026

**Table C- 53**  
**Summary of Diesel Exhaust Emissions from Non-Biogas Emergency Engines**

<b>Facility ID No.</b>	<b>Engine HP</b>	<b>TPY PM</b>
Facility 1	31430	0.2467415
Facility 2	13272	0.0851537
Facility 3	12185	0.0782137
Facility 4	11191	0.0510922
Facility 5	3804	0.0323925
Facility 6	2425	0.0206498
Facility 7	1800	0.0153277
Facility 8	1760	0.0149871
Facility 9	2045	0.0146039
Facility 10	1580	0.0134543
Facility 11	1575	0.0134117
Facility 12	1535	0.0111551
Facility 13	2917	0.0100481
Facility 14	6813	0.0096309
Facility 15	1110	0.0094521
Facility 16	1055	0.0089837
Facility 17	1054	0.0089752
Facility 18	1008	0.0085835
Facility 19	1580	0.0084302
Facility 20	954	0.0081237
Facility 21	853	0.0072636
Facility 22	840	0.0071529
Facility 23	825	0.0070252
Facility 24	800	0.0068123
Facility 25	2875	0.0057479
Facility 26	2400	0.0057479
Facility 27	594	0.0050581
Facility 28	594	0.0050581
Facility 29	592	0.0050411
Facility 30	581	0.0049474
Facility 31	798	0.0048197
Facility 32	558	0.0047516
Facility 33	780	0.004726
Facility 34	545	0.0046409
Facility 35	512	0.0043599
Facility 36	500	0.0042577
Facility 37	500	0.0042577
Facility 38	468	0.0039852
Facility 39	460	0.0039171
Facility 40	740	0.0036616
Facility 41	567	0.0036616
Facility 42	427	0.0036361

**Table C- 53 (Continued)**  
**Summary of Diesel Exhaust Emissions from Non-Biogas Emergency Engines**

<b>Facility ID No.</b>	<b>Engine HP</b>	<b>TPY PM</b>
Facility 43	412	0.0035083
Facility 44	400	0.0034061
Facility 45	400	0.0034061
Facility 46	395	0.0033636
Facility 47	395	0.0033636
Facility 48	395	0.0033636
Facility 49	880	0.003321
Facility 50	1161	0.0031507
Facility 51	369	0.0031422
Facility 52	348	0.0029633
Facility 53	755	0.0028101
Facility 54	330	0.0028101
Facility 55	330	0.0028101
Facility 56	3711	0.0027845
Facility 57	459	0.0026738
Facility 58	314	0.0026738
Facility 59	300	0.0025546
Facility 60	300	0.0025546
Facility 61	283	0.0024099
Facility 62	270	0.0022992
Facility 63	530	0.0022566
Facility 64	250	0.0021288
Facility 65	230	0.0019585
Facility 66	400	0.0017031
Facility 67	186	0.0015839
Facility 68	180	0.0015328
Facility 69	180	0.0015328
Facility 70	175	0.0014902
Facility 71	145	0.0012347
Facility 72	145	0.0012347
Facility 73	145	0.0012347
Facility 74	778	0.0012177
Facility 75	140	0.0011922
Facility 76	121	0.0010304
Facility 77	100	0.0008515
Facility 78	465	0.000843
Facility 79	94	0.0008004

**Table C- 54**  
**Summary of Ammonia Slip Emission**

<b>Facility ID No.</b>	<b>Ammonia Slip, ton/year</b>	<b>19% Ammonia Use, gal/year</b>	<b>Urea Use, gal/yr</b>
Facility 1	0.13	1,065	298
Facility 2	0.13	1,052	294
Facility 3	0.45	3,598	1,007
Facility 4	0.78	6,194	1,734
Facility 5	0.62	4,939	1,383
Facility 6	0.38	3,034	849
Facility 7	0.42	3,352	938
Facility 8	1.68	13,324	3,730
Facility 9	3.38	26,869	7,521
Facility 10	0.67	5,337	1,494
Facility 11	0.33	2,603	729
Facility 12	1.77	14,067	3,938
Facility 13	1.66	13,152	3,681
Facility 14	0.64	5,108	1,430
Facility 15	0.09	748	209
Facility 16	0.34	2,732	765
Facility 17	1.39	11,026	3,086
Facility 18	0.81	6,444	1,804
Facility 19	0.34	2,667	747
Facility 20	0.04	308	86
Facility 21	0.06	455	127
Facility 22	0.16	1,237	346
Facility 23	2.08	16,540	4,630

Facilities listed in Table C-53 are not necessarily the same as in Table C-54.



**Table C-55  
Health Risk Calculations from Biogas Emergency Engines**

**Biogas Emergency Engine Carcinogenic Health Risk**

Facility	No of Emerg ICEs	Single Unit Emissions, lb/yr	Facility DPM Emissions, ton/yr	Facility DPM Emissions, g/s	Cancer Potency Factor, (mg/kg-day) <sup>-1</sup>	Daily Breathing Rate, L/kg-day	Exposure Frequency, day/year	Exposure Duration, year	Averaging Time, day	Modeled Conc, (ug/m3)/(g/s)	Carcinogenic Health Risk	Mitigated Carcinogenic Health Risk
Facility A	4	9	0.0186142	5.35E-04	1.10	302.00	350.00	70.00	2.56E+04	19.977	3.41E-06	5.11E-07
Facility B	2	8	0.0078784	2.27E-04	1.10	302.00	350.00	70.00	2.56E+04	5.49	3.96E-07	5.945E-08

Carcinogenic Health Risk = [DPM Emissions, g/s x Cancer Potency Factor, (mg/kg-day)<sup>-1</sup> x Daily Breathing Rate, L/kg-day x Exposure Frequency, hr/yr x Exposure Duration, yr x Modeled Conc., (ug/m3)/(g/s)]/(Averaging Time, day x 1,000,000 ug/mg)

**Biogas Emergency Engine Chronic Non Carcinogenic Health Risk**

Facility	No of Emergency ICEs	Single Unit Emissions, lb/yr	Facility DPM Emissions, ton/yr	Facility DPM Emissions, g/s	Reference Exposure Level, ug/m3	Modeled Conc, (ug/m3)/(g/s)	Chronic Hazard Index
Facility A	4	9	0.0186142	5.35E-04	5.00E+00	19.977	0.0021
Facility B	2	8	0.0078784	2.27E-04	5.00E+00	5.49	0.00025

Chronic Hazard Index = [Modeled Conc., (ug/m3)/(g/s)]/(Reference Exposure Level, ug/m3)

DPM target organ – Respiratory

**Table C-56**  
**Health Risk Calculations from Non-Biogas Emergency Engines**

**Non-Biogas Emergency Engine Carcinogenic Health Risk**

Facility	Combined Facility Engine Power, <sup>a</sup> bhp	Existing Engine Size, <sup>b</sup> bhp	Diesel Engine Replacement Size, <sup>c</sup> bhp	Number of Diesel Engines <sup>d</sup>	Receptor Distance, <sup>e</sup> m	ARB Single Engine Carcinogenic Health Risk <sup>f</sup> (millions)	Residential Carcinogenic Health Risk <sup>g</sup> (millions)	Worker Carcinogenic Health Risk <sup>h</sup> (millions)	MICR <sup>i</sup>	Mitigated MICR <sup>j</sup>	Chronic Hazard Index <sup>k</sup>
Facility C	28,976	five 5000, two 738	2,600	11	50	4	44.6	8.92	8.9		0.034
Facility D	10,000	five 2000	2,600	4	1,000	1	3.8	0.77	3.8		0.003
Facility E	11,175	3200, 3000, five 995	2,600	4	300	2	8.6	1.72	1.7		0.007
Facility F	6,000	three 2000	2,600, 750	two 2600, 750	40	4, 10	18.0	3.60	18.0	4.5	0.014
Facility G	3,804	six 634	2,600, 1,500	2,600, 1,500	30	12	12.0	2.40	2.4		0.009

- a) Combined facility engine power - the sum of the bhp of the engines at a single facility
- b) Existing engine size, bhp from survey information
- c) Diesel engine replacement size was based on sizes available in the ARB "Hot Spots" Stationary Diesel Engine Screening Risk Assessment Tables (<http://www.arb.ca.gov/ab2588/diesel/diesel.htm>)
- d) Number of engines is the number of ARB modeled engines that would be required to match the combined facility engine power. The largest stationary diesel emergency engine are around 3,000 bhp.
- e) Receptor distances approximated from aerial photos on Google maps ([www.maps.google.com](http://www.maps.google.com))
- f) Carcinogenic health risk associated with receptor distance and health risk in ARB diesel engine HRA tables for a single engine operating 50 hours per year.
- g) Carcinogenic risk scaled to number of engines.
- h) Worker carcinogenic health risk estimated by dividing residential health risk by a factor of five.
- i) The maximum exposed individual (residential or worker) based on information found in Google maps and Metrobot (<http://streets.metrobot.com>)
- j) ARB has validated diesel particulate filters for stationary ICE as at least 85 percent efficient.
- k) Chronic HI = (residential carcinogenic health risk x AT)/(REF x CP x DBR x EF x ED), where AT = 25,550 days, diesel REF = 5 ug/m<sup>3</sup>, CP 1.1 mg/kg-day, DBR = 302 L/kg-day, EF = 350 days/year, ED = 70 years

**Table C-57**  
**ARB's Diesel Exhaust PM Risk (Potential Cancer Cases in a Million) for 750 BHP Engines**

EF = 0.15 g/bhp-hr										
Downwind Distance (m)										
20	30	40	<b>50</b>	70	100	200	400	800	1200	1600
2	2	2	2	2	1	0	0	0	0	0
4	4	4	4	3	2	1	0	0	0	0
6	6	6	6	5	3	1	0	0	0	0
8	8	8	8	7	4	1	0	0	0	0
10	10	10	10	8	5	2	0	0	0	0
20	20	20	20	16	11	3	1	0	0	0
30	30	30	30	25	16	5	1	0	0	0
40	40	40	40	33	21	7	2	0	0	0
61	61	61	61	49	32	10	3	1	0	0
81	81	81	81	66	42	13	3	1	0	0
101	101	101	101	82	53	17	4	1	0	0
202	202	202	202	164	106	33	8	2	1	1

ARB "Hot Spots" Stationary Diesel Engine Screening Risk Assessment Tables (<http://www.arb.ca.gov/ab2588/diesel/diesel.htm>)

**Table C-58**  
**ARB's Diesel Exhaust PM Risk (Potential Cancer Cases in a Million) for 1,500 BHP Engines**

EF = 0.15 g/bhp-hr														
Downwind Distance (m)														
20	30	40	50	60	70	80	90	100	200	300	400	800	1200	1600
2	2	2	2	2	2	2	2	1	1	0	0	0	0	0
3	3	3	3	3	3	3	3	3	2	1	0	0	0	0
5	5	5	5	5	5	5	5	4	2	1	1	0	0	0
6	6	6	6	6	6	6	6	6	3	2	1	0	0	0
8	8	8	8	8	8	8	8	7	4	2	1	0	0	0
15	15	15	15	15	15	15	15	15	8	4	2	1	0	0
23	23	23	23	23	23	23	23	22	12	6	4	1	0	0
30	30	30	30	30	30	30	30	30	16	8	5	1	1	0
45	45	45	45	45	45	45	45	45	24	12	7	2	1	1
60	60	60	60	60	60	60	60	60	31	16	10	2	1	1
75	75	75	75	75	75	75	75	75	39	20	12	3	1	1
151	151	151	151	151	151	151	151	150	78	41	24	6	3	2

ARB "Hot Spots" Stationary Diesel Engine Screening Risk Assessment Tables (<http://www.arb.ca.gov/ab2588/diesel/diesel.htm>)

**Table C-59**  
**ARB's Diesel Exhaust PM Risk (Potential Cancer Cases in a Million) for 2,600 BHP Engines**

EF = 0.15 g/bhp-hr											
Downwind Distance (m)											
50	80	100	120	<b>150</b>	175	200	280	370	400	800	1600
1	1	1	1	1	1	1	1	0	0	0	0
2	2	2	2	2	2	2	1	1	1	0	0
3	3	3	3	3	3	3	2	1	1	0	0
4	4	4	4	4	4	3	2	2	1	0	0
4	4	4	4	4	4	4	3	2	2	1	0
9	9	9	9	9	9	8	6	4	4	1	0
13	13	13	13	13	13	12	9	6	5	2	1
18	18	18	18	18	17	16	12	8	7	2	1
26	26	26	26	26	26	25	18	12	11	3	1
35	35	35	35	35	35	33	24	16	14	4	1
44	44	44	44	44	44	41	30	20	18	5	2
88	88	88	88	88	87	82	59	40	36	10	3

ARB "Hot Spots" Stationary Diesel Engine Screening Risk Assessment Tables (<http://www.arb.ca.gov/ab2588/diesel/diesel.htm>)

**Table C-60  
Health Risk Calculations from Biogas SCR Ammonia Slip**

**Chronic Non-Carcinogenic Health Risk**

Facility ID	No of Engines	Single Unit Emissions, lb/yr	Facility NH3 Emissions, ton/yr	X/Q, (ug/m3)/ (tons/yr)	Met Factor	Muti-Pathway Factor	Reference Exposure Level, ug/m3	Chronic Hazard Index
Facility A	5	2,255	5.637	49.68	0.69	1	2.00E+02	0.97

Chronic Hazard Index = (Facility DPM Emissions, ton/yr x X/Q, (ug/m3)/ (tons/yr) x Met Factor x Multi-Pathway Factor)/(Reference Exposure Level, ug/m3)

**Acute Non-Carcinogenic Health Risk**

Facility	No of Engines	Single Unit Emissions, lb/yr	Facility NH3 Emissions, lb/hr	X/Q, (ug/m3)/ (lb/hr)	Reference Exposure Level, ug/m3	Acute Hazard Index
Facility A	5	2,255	1.29	1000	3.20E+03	0.40

Acute Hazard Index = (Facility DPM Emissions, lb/hr x X/Q, (ug/m3)/ (lb/hr) x Met Factor x Multi-Pathway Factor)/(Reference Exposure Level, ug/m3)

**Table C-61  
LNG Calculations**

Facility ID No.	Total LNG, MMBtu/year	Total LNG, gal/yr	LNG, gal/wk	LNG, gal/dy	LNG, cf/day	LNG, lb/day	LNG, lb/five days	LNG, gal/5 days
Facility 1	7,409	83,242	1,601	228	30	0	0	1,140
Facility 2	11,785	132,411	2,546	363	48	1,285	6,426	1,814
Facility 3	71,546	803,888	15,459	2,202	294	7,802	39,011	11,012
Facility 4	58,214	654,085	12,579	1,792	240	6,348	31,741	8,960
Facility 5	26,222	294,630	5,666	807	108	2,860	14,298	4,036
Facility 6	22,991	258,324	4,968	708	95	2,507	12,536	3,539
Facility 7	24,931	280,127	5,387	767	103	2,719	13,594	3,837
Facility 8	150,052	1,685,975	32,423	4,619	617	16,363	81,817	23,096
Facility 9	280,256	3,148,948	60,557	8,627	1,153	30,562	152,812	43,136
Facility 10	119,352	1,341,034	25,789	3,674	491	13,016	65,078	18,370
Facility 11	60,486	679,619	13,070	1,862	249	6,596	32,980	9,310
Facility 12	419,715	4,715,897	90,690	12,920	1,727	45,770	228,852	64,601
Facility 13	251,532	2,826,202	54,350	7,743	1,035	27,430	137,150	38,715
Facility 14	114,236	1,283,547	24,684	3,517	470	12,458	62,288	17,583
Facility 15	8,525	95,784	1,842	262	35	930	4,648	1,312
Facility 16	51,845	582,530	11,203	1,596	213	5,654	28,269	7,980
Facility 17	304,962	3,426,539	65,895	9,388	1,255	33,257	166,283	46,939
Facility 18	178,374	2,004,202	38,542	5,491	734	19,452	97,260	27,455
Facility 19	9,548	107,278	2,063	294	39	1,041	5,206	1,470
Facility 20	3,527	39,624	762	109	15	385	1,923	543
Facility 21	4,018	45,149	868	124	17	438	2,191	618
Facility 22	13,393	150,485	2,894	412	55	1,461	7,303	2,061
Facility 23	369,900	4,156,180	79,927	11,387	1,522	40,338	201,691	56,934
<b>Total</b>	<b>2,562,817</b>	<b>28,712,460</b>	<b>552,163</b>	<b>78,664</b>	<b>10,516</b>	<b>278,671</b>	<b>1,393,355</b>	<b>393,321</b>

89,000 Btu/gal

Facilities listed in Table C-61 are not necessarily the same as in Tables C-53 and C-54.

**Table C-62  
Health Risk Calculations from LNG Truck Delivery**

**Carcinogenic Health Risk**

Facility DPM Emissions, ton/yr	X/Q, (ug/m3)/(tons/yr)	Met Factor	Annual Conc, Adjustment Factor	Daily Breathing Rate, L/kg-day	Exposure Value Factor	Muti-Pathway Factor	Cancer Potency Factor, (mg/kg-day) <sup>-1</sup>	Carcinogenic Health Risk
2.09E-06	2.98	1	1	302	0.96	1	1.1	1.99E-09

MICR = Cancer Potency Factor, (mg/kg-day)<sup>-1</sup> x Facility DPM Emissions, ton/year x X/Q, (g/m3)/(tons/yr)x Annual Conc, Adjustment Factor x Met Factor x Daily Breathing Rate, L/kg-day x Exposure Value Factor x Muti-Pathway Factor]/ (1,000,000 ug/mg)

**Chronic Non-Carcinogenic Health Risk**

Facility DPM Emissions, ton/yr	Facility, lb/hr	X/Q, (ug/m3)/ (tons/yr)	Met Factor	Reference Exposure Level, ug/m3	Met Factor	Chronic Hazard Index
2.09E-06	2.17E-04	41.45	1	5.00E+00	1	1.80E-03

Chronic Hazard Index = (Facility DPM Emissions, ton/yr x X/Q, (ug/m3)/ (tons/yr) x Met Factor x Multi-Pathway Factor)/(Reference Exposure Level, ug/m3)



**Table C-63**  
**Example RMP\*COMP Input File for a Bermed Ammonia Storage Tank**

RMP\*Comp Ver. 1.07

Results of Consequence Analysis

Chemical: Ammonia (water solution) 20%

CAS #: 7664-41-7

Category: Toxic Liquid

Scenario: Worst-case

Quantity Released: 5500 gallons

Liquid Temperature: 25 C

Mitigation Measures:

Diked area: 267 square feet

Dike height: 3 feet

Release Rate to Outside Air: 5.61 pounds per minute

Topography: Rural surroundings (terrain generally flat and unobstructed)

Toxic Endpoint: 0.14 mg/L; basis: ERPG-2

Estimated Distance to Toxic Endpoint: 0.1 miles (0.2 kilometers)

-----Assumptions About This Scenario-----

Wind Speed: 1.5 meters/second (3.4 miles/hour)

Stability Class: F

Air Temperature: 77 degrees F (25 degrees C)

**Table C-64**  
**Example RMP\*COMP Input File for a Bermed LNG Storage Tank**

RMP\*Comp Ver. 1.07

Results of Consequence Analysis

Chemical: Methane

CAS #: 74-82-8

Category: Flammable Gas

Scenario: Worst-case

Liquefied by refrigeration

Quantity Released: 71000 gallons

Release Type: Vapor Cloud Explosion

Mitigation Measures:

Diked area: 3480 square feet

Dike height: 3 feet

Release Rate to Outside Air: 731 pounds per minute

Quantity Evaporated in 10 Minutes: 7310 pounds

Estimated Distance to 1 psi overpressure: .2 miles (.3 kilometers)

**Table C-64 (Concluded)**  
**Example RMP\*COMP Input File for a Bermed LNG Storage Tank**

-----Assumptions About This Scenario-----

Wind Speed: 1.5 meters/second (3.4 miles/hour)

Stability Class: F

Air Temperature: 77 degrees F (25 degrees C)

-----

**Table C-65**  
**Example RMP\*COMP Input File for Delivery Truck**

RMP\*Comp Ver. 1.07

Results of Consequence Analysis

Chemical: Methane

CAS #: 74-82-8

Category: Flammable Gas

Scenario: Worst-case

Liquefied by refrigeration

Quantity Released: 10000 gallons

Release Type: Vapor Cloud Explosion

Mitigation Measures: NONE

Estimated Distance to 1 psi overpressure: .3 miles (.4 kilometers)

-----Assumptions About This Scenario-----

Wind Speed: 1.5 meters/second (3.4 miles/hour)

Stability Class: F

Air Temperature: 77 degrees F (25 degrees C)

---

**Table C-66**  
**Example RMP\*COMP Input File for Delivery Truck Pool Fire**

RMP\*Comp Ver. 1.07

Results of Consequence Analysis

Chemical: Methane

CAS #: 74-82-8

Category: Flammable Gas

Scenario: Alternative

Liquefied by refrigeration

Release Duration: 1 minutes

Release Type: Pool Fire

Release Rate: 6000 gallons per min

Mitigation Measures: NONE

Topography: Rural surroundings (terrain generally flat and unobstructed)

Estimated Distance to Heat Radiation Endpoint (5 kilowatts/square meter): .2 miles (.3 kilometers)

**Table C-66 (Concluded)**  
**Example RMP\*COMP Input File for Delivery Truck Pool Fire**

-----Assumptions About This Scenario-----

Wind Speed: 3 meters/second (6.7 miles/hour)

Stability Class: D

Air Temperature: 77 degrees F (25 degrees C)

**Table C-67**  
**Example RMP\*COMP Input File for Delivery Boiling Liquid Expanding Vapor Explosion**

RMP\*Comp Ver. 1.07

Results of Consequence Analysis

Chemical: Methane

CAS #: 74-82-8

Category: Flammable Gas

Scenario: Alternative

Liquefied by refrigeration

Release Type: BLEVE

Quantity in Fireball: 10000 gallons

Estimated Distance at which exposure may cause second-degree burns: .3 miles (.4 kilometers)

-----Assumptions About This Scenario-----

Wind Speed: 3 meters/second (6.7 miles/hour)

Stability Class: D

Air Temperature: 77 degrees F (25 degrees C)

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**Table C-68**  
**LNG or NH3 Hypothetical\* Accidental Release Impacts to Airports and Airfields**

<b>Airports</b>	<b>Estimated NH3 Tank Size (gal)</b>	<b>Estimated LNG Tank Size (gal)</b>	<b>Distance to Airport (mile)</b>	<b>Distance to Toxic Endpoint (mile)</b>	<b>Significant for NH3</b>	<b>Distance to 1 psi overpressure, (mile)</b>	<b>Significant for LNG</b>
Riverside Municipal	5,500	4,500	0.51	0.01	No	0.06	No
Ontario International	5,500	10,000	0.92	0.01	No	0.08	No
San Bernardino International	5,500	11,000	0.52	0.01	No	0.09	No
Whiteman, LA County	5,500	71,000	1.45	0.01	No	0.2	No
Rialto Municipal	5,500	8,000	0.49	0.01	No	0.08	No
Ontario International	5,500	8,000	1.58	0.01	No	0.08	No
Chino Airport	5,500	1,500	0.32	0.01	No	0.04	No
Burbank	5,500	52,000	1.18	0.01	No	0.1	No
Whiteman, LA County	5,500	21,000	1.97	0.01	No	0.1	No

Note: Biogas facilities will either install add-on control and potential have NH3 adverse impacts or replace ICEs with LNG plants but not both. Therefore the adverse impacts would not overlap from the same facility. No biogas facility is within two miles of another.

\*None of these facilities have indicated their compliance option.

**Table C-69**  
**LNG or NH3 Hypothetical\* Accidental Release Impacts to Schools**

<b>Name of School</b>	<b>Estimated NH3 Tank Size (gal)</b>	<b>Estimated LNG Tank Size (gal)</b>	<b>Distance to School (mile)</b>	<b>Distance to Toxic Endpoint (mile)</b>	<b>Significant for NH3</b>	<b>Distance to 1 psi overpressure, (mile)</b>	<b>Significant for LNG</b>
St. Edward the Confessor Parish	5,500	2,000	0.39	0.01	No	0.05	No
Capo Beach Calvary Schools			0.41	0.01	No	0.05	No
El Potrero Elementary	5,500	600	0.36	0.01	No	0.08	No

Note: Biogas facilities will either install add-on control and potential have NH3 adverse impacts or replace ICEs with LNG plants but not both. Therefore the adverse impacts would not overlap from the same facility. No biogas facility is within two miles of another.

\*None of these facilities have indicated their compliance option.

**Table C-70  
LNG or NH3 Hypothetical\* Accidental Release Impacts to Other Non-Residential Sensitive Receptors**

Name of Sensitive Receptor	Estimated NH3 Tank Size (gal)	Estimated LNG Tank Size (gal)	Distance to School (mile)	Distance to Toxic Endpoint (mile)	Significant for NH3	Distance to 1 psi overpressure, (mile)	Significant for LNG
Childtime Children's Ctr	5,500	4,500	0.31	0.01	No	0.06	No

Note: Biogas facilities will either install add-on control and potential have NH3 adverse impacts or replace ICEs with LNG plants but not both. Therefore the adverse impacts would not overlap from the same facility. No biogas facility is within two miles of another.

\*None of these facilities have indicated their compliance option.

**Table C-71  
Solid Waste Adverse Impacts**

Upgrade Three-Way Catalyst	Install Cat Ox	Engines that May Be Electrified	Biogas Engines that May Be Replaced	SCR	Non-Biogas Electric Engine, lb	Biogas Electric Engine, lb	New Cat Ox, lb	New Cat Ox Number of Trucks Required	Upgrade Cat Ox, lb	Upgrade Number of Trucks Required	Carbon,, lb	Carbon No of Trucks Required	SCR, lb	SCR Number of Trucks Required
217	114	225	66	66	1,888,014	924,205	90,669	156	28,540	214	231,281	148	72,175	119

**Solid and Hazardous Waste Disposed (in tons)**

Description	Total	Upgrade	New Cat	SCR
Solid Waste	1,522			
Hazardous Waste Disposed		14.3	45.3	36.1

**Table C-72**  
**Alternative B Total Construction Criteria Emissions**

**SCR-Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	247	106	30.4	0.23	12.9	11.9	727
<b>2012</b>	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Gas Turbines - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	247	106	30.4	0.23	12.9	11.9	727
<b>2012</b>	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Microturbines - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	247	106	30.4	0.23	12.9	11.9	727
<b>2012</b>	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Gas Turbines/LNG - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	89.8	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	682	291	84.1	0.60	48.4	35.6	2,371
<b>2012</b>	488	206.6	60.2	0.43	38.3	26.2	1,718

**Table C-72 (Concluded)**  
**Alternative B Total Construction Criteria Emissions**

**Microturbines/LNG - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	90	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	682	291	84.1	0.60	48.4	35.6	2,371
<b>2012</b>	488	206.6	60.2	0.43	38.3	26.2	1,718

**Table C-73**  
**Alternative B Total Operational Criteria Emissions**

**SCR - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999 <u>9,004</u>	53,867 <u>53,900</u>	2,458 <u>2,467</u>	544 <u>545</u>	872 <u>873</u>	870 <u>871</u>	1,227,230 -
<b>2009</b>	6,410 <u>6,415</u>	22,399 <u>22,432</u>	1,790 <u>1,799</u>	543 <u>544</u>	858 <u>859</u>	856 <u>857</u>	1,231,763 -
<b>2010</b>	5,862 <u>5,867</u>	17,323 <u>17,356</u>	1,280 <u>1,289</u>	534 <u>535</u>	837 <u>838</u>	835 <u>836</u>	1,208,248 -
<b>2011</b>	5,349 <u>5,354</u>	13,511 <u>13,544</u>	1,209 <u>1,218</u>	528 <u>529</u>	821 <u>822</u>	819 <u>820</u>	1,196,641 -
<b>2012</b>	4,129	13,459	1,013	538	830	829	1,231,572
<b>2014</b>	4,188	13,477	1,018	538	833	831	1,231,599

**Gas Turbines - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999 <u>9,004</u>	53,867 <u>53,900</u>	2,458 <u>2,467</u>	544 <u>545</u>	872 <u>873</u>	870 <u>871</u>	1,227,230 -
<b>2009</b>	6,410 <u>6,415</u>	22,399 <u>22,432</u>	1,790 <u>1,799</u>	543 <u>544</u>	858 <u>859</u>	856 <u>857</u>	1,231,763 -
<b>2010</b>	5,862 <u>5,867</u>	17,323 <u>17,356</u>	1,280 <u>1,289</u>	534 <u>535</u>	837 <u>838</u>	835 <u>836</u>	1,208,248 -
<b>2011</b>	5,343 <u>5,348</u>	13,509 <u>13,542</u>	1,209 <u>1,218</u>	528 <u>529</u>	821 <u>822</u>	819 <u>820</u>	1,196,710 -
<b>2012</b>	4,829	7,394	535	538	1,016	1,014	1,231,248
<b>2014</b>	4,888	7,412	540	538	1,019	1,017	1,231,248

**Table C-73 (Continued)**  
**Alternative B Total Operational Criteria Emissions**

**Microturbines - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	-
<b>2010</b>	5,862	17,323	1,280	534	837	835	1,208,248
	<u>5,867</u>	<u>17,356</u>	<u>1,289</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,343	13,509	1,209	528	821	819	1,196,710
	<u>5,348</u>	<u>13,542</u>	<u>1,218</u>	<u>529</u>	<u>822</u>	<u>820</u>	-
<b>2012</b>	3,864	6,206	641	538	757	756	1,231,362
<b>2014</b>	3,923	6,224	645	538	760	758	1,231,362

**Gas Turbines/LNG - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,440	23,215	1,814	543	860	858	1,232,969
	<u>6,445</u>	<u>23,248</u>	<u>1,823</u>	<u>544</u>	<u>861</u>	<u>859</u>	-
<b>2010</b>	5,862	17,323	1,280	534	837	835	1,208,248
	<u>5,867</u>	<u>17,356</u>	<u>1,289</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,394	13,525	1,213	528	823	821	1,196,943
	<u>5,399</u>	<u>13,558</u>	<u>1,222</u>	<u>529</u>	<u>824</u>	<u>822</u>	-
<b>2012</b>	4,258	6,539	526	211	872	870	1,093,200
<b>2014</b>	4,377	6,576	535	211	878	876	1,093,528



**Table C-73 (Concluded)**  
**Alternative B Total Operational Criteria Emissions**

**Microturbines/LNG - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999 <u>9,004</u>	53,867 <u>53,900</u>	2,458 <u>2,467</u>	544 <u>545</u>	872 <u>873</u>	870 <u>871</u>	1,227,230 -
<b>2009</b>	6,410 <u>6,415</u>	22,399 <u>22,432</u>	1,790 <u>1,799</u>	543 <u>544</u>	858 <u>859</u>	856 <u>857</u>	1,231,763 -
<b>2010</b>	5,862 <u>5,867</u>	17,323 <u>17,356</u>	1,280 <u>1,289</u>	534 <u>535</u>	837 <u>838</u>	835 <u>836</u>	1,208,248 -
<b>2011</b>	5,394 <u>5,399</u>	13,525 <u>13,558</u>	1,213 <u>1,222</u>	528 <u>529</u>	823 <u>824</u>	821 <u>822</u>	1,196,943 -
<b>2012</b>	3,874	6,075	572	211	767	765	1,093,308
<b>2014</b>	3,993	6,111	581	211	773	771	1,093,637

**Table C-74**  
**Alternative B Total Criteria Emissions**

**SCR - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	9,089 <u>9,094</u>	53,909 <u>53,942</u>	2,470 <u>2,479</u>	543.9 <u>545</u>	876.8 <u>878</u>	874.7 <u>876</u>	1,227,861
<b>2009</b>	6,410 <u>6,415</u>	22,399 <u>22,432</u>	1,790 <u>1,799</u>	543 <u>544</u>	858 <u>859</u>	856 <u>857</u>	1,231,763
<b>2010</b>	6,004 <u>6,009</u>	17,385 <u>17,418</u>	1,297 <u>1,306</u>	534 <u>535</u>	844 <u>845</u>	842 <u>843</u>	1,208,451
<b>2011</b>	5,595 <u>5,600</u>	13,617 <u>13,650</u>	1,240 <u>1,249</u>	529 <u>530</u>	834 <u>835</u>	831 <u>832</u>	1,197,367
<b>2012</b>	4,181	13,481	1,020	538	833	831	1,231,645
<b>2014</b>	4,188	13,477	1,018	538	833	831	1,231,599

**Table C-74 (Continued)**  
**Alternative B Total Criteria Emissions**

**Gas Turbines - Total**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	6,004	17,385	1,297	534	844	842	1,208,451
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,589	13,616	1,239	529	833	831	1,197,436
	<u>5,594</u>	<u>13,649</u>	<u>1,248</u>	<u>530</u>	<u>834</u>	<u>832</u>	
<b>2012</b>	4,882	7,416	542	538	1,019	1,017	1,231,321
<b>2014</b>	4,888	7,412	540	538	1,019	1,017	1,231,248

**Microturbines - Total**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	6,004	17,385	1,297	534	844	842	1,208,451
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,589	13,616	1,239	529	833	831	1,197,436
	<u>5,594</u>	<u>13,649</u>	<u>1,248</u>	<u>530</u>	<u>834</u>	<u>832</u>	
<b>2012</b>	3,917	6,228	647	538	760	758	1,231,435
<b>2014</b>	3,923	6,224	645	538	760	758	1,231,362

**Gas Turbines/LNG - Total**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	6,004	17,385	1,297	534	844	842	1,208,451
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	6,076	13,816	1,297	529	872	857	1,199,314
	<u>6,081</u>	<u>13,849</u>	<u>1,306</u>	<u>530</u>	<u>873</u>	<u>858</u>	
<b>2012</b>	4,746	6,746	586	211	911	896	1,094,918
<b>2014</b>	4,377	6,576	535	211	878	876	1,093,528

**Table C-74 (Concluded)**  
**Alternative B Total Criteria Emissions**

**Microturbines/LNG - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,231,763
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,208,451
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	6,004	17,385	1,297	534	844	842	1,199,314
	<u>6,009</u>	<u>17,418</u>	<u>1,306</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	6,076	13,816	1,297	529	872	857	1,199,314
	<u>6,081</u>	<u>13,849</u>	<u>1,306</u>	<u>530</u>	<u>873</u>	<u>858</u>	
<b>2012</b>	4,362	6,281	632	211	805	791	1,095,026
<b>2014</b>	3,993	6,111	581	211	773	771	1,093,637

**Table C-75**  
**Alternative B Total Compared to Baseline**

**SCR - Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4	(22,186)
	<u>(100)</u>	<u>(301)</u>	<u>(14)</u>	<u>(6.9)</u>	<u>0.8</u>	<u>0.4</u>	
<b>2009</b>	(3,191)	(36,858)	(1,196)	(17)	(33)	(33)	(41,596)
	<u>(3,185)</u>	<u>(36,825)</u>	<u>(1,187)</u>	<u>(17)</u>	<u>(32)</u>	<u>(32)</u>	
<b>2010</b>	(3,191)	(36,858)	(1,196)	(17)	(33)	(33)	(41,596)
	<u>(3,185)</u>	<u>(36,825)</u>	<u>(1,187)</u>	<u>(17)</u>	<u>(32)</u>	<u>(32)</u>	
<b>2011</b>	(3,600)	(40,626)	(1,253)	(23)	(43)	(44)	(52,679)
	<u>(3,594)</u>	<u>(40,593)</u>	<u>(1,244)</u>	<u>(22)</u>	<u>(42)</u>	<u>(43)</u>	
<b>2012</b>	(5,013)	(40,762)	(1,473)	(13)	(44)	(44)	(18,402)
<b>2014</b>	(5,007)	(40,766)	(1,475)	(13)	(44)	(44)	(18,448)

**Table C-75 (Continued)**  
**Alternative B Total Compared to Baseline**

**Gas Turbines - Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4	(22,186)
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2011</b>	(3,605) (3,600)	(40,627) (40,594)	(1,253) (1,245)	(23) (22)	(43) (43)	(44) (43)	(52,610)
<b>2012</b>	(4,313)	(46,827)	(1,951)	(13)	142	142	(18,725)
<b>2014</b>	(4,307)	(46,831)	(1,953)	(13)	142	142	(18,798)

**Microturbines - Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4	(22,186)
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2011</b>	(3,605) (3,600)	(40,627) (40,594)	(1,254) (1,245)	(23) (22)	(43) (43)	(44) (43)	(52,610)
<b>2012</b>	(5,278)	(48,015)	(1,846)	(13)	(117)	(117)	(18,611)
<b>2014</b>	(5,272)	(48,019)	(1,848)	(13)	(117)	(117)	(18,684)

**Gas Turbines/LNG - Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4	(22,186)
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2011</b>	(3,119) (3,113)	(40,427) (40,394)	(1,196) (1,187)	(22) (22)	(5) (4)	(18) (17)	(50,732)
<b>2012</b>	(4,449)	(47,497)	(1,907)	(340)	33.6	21.28	(155,129)
<b>2014</b>	(4,818)	(47,667)	(1,957)	(340)	1.2	0.73	(156,519)

**Table C-75 (Concluded)**  
**Alternative B Total Compared to Baseline**

**Microturbines/LNG - Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106) (100)	(334) (301)	(22) (14)	(7.5) (6.9)	(0.1) 0.8	0.4 0.4	(22,186)
<b>2009</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2010</b>	(3,191) (3,185)	(36,858) (36,825)	(1,196) (1,187)	(17) (17)	(33) (32)	(33) (32)	(41,596)
<b>2011</b>	(3,119) (3,113)	(40,427) (40,394)	(1,196) (1,187)	(22) (22)	(5) (4)	(18) (17)	(50,732)
<b>2012</b>	(4,833)	(47,962)	(1,861)	(340)	(72)	(84)	(155,020)
<b>2014</b>	(5,202)	(48,132)	(1,912)	(340)	(104)	(104)	(156,410)

**Table C-76**

**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for  
Alternative B to Be Carbon Neutral**

**SCR - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,596)	(23,363)	18,233		
<b>2010</b>	(41,596)	(23,363)	18,233		
<b>2011</b>	(52,679)	(22,016)	30,663		
<b>2012</b>	(18,402)	11,505	29,907		
<b>2014</b>	(18,448)	11,459	29,907		
<b>2013-2018</b>	(110,686)	68,753	179,439		
<b>10 year total</b>	(264,959)	11,516	276,475	1,636	8

**Table C-76 (Continued)**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for Alternative B to Be Carbon Neutral**

**Gas Turbines – Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	121,080	(23,363)	18,233		
<b>2010</b>	(41,596)	(23,363)	18,233		
<b>2011</b>	(52,610)	(21,947)	30,663		
<b>2012</b>	(18,725)	11,181	29,907		
<b>2014</b>	(18,798)	11,108	29,907		
<b>2013-2018</b>	(112,790)	66,649	179,439		
<b>10 year total</b>	(104,642)	9,157	113,799	673	14

**Microturbines – Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,596)	(23,363)	18,233		
<b>2010</b>	(41,596)	(23,363)	18,233		
<b>2011</b>	(52,610)	(21,947)	30,663		
<b>2012</b>	(18,611)	11,295	29,907		
<b>2014</b>	(18,684)	11,222	29,907		
<b>2013-2018</b>	(112,106)	67,333	179,439		
<b>10 year total</b>	(266,520)	9,955	276,475	1,636	7

**Table C-76 (Concluded)**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for Alternative B to Be Carbon Neutral**

**Gas Turbines/LNG - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,596)	(23,363)	18,233		
<b>2010</b>	(41,596)	(23,363)	18,233		
<b>2011</b>	(50,732)	(20,069)	30,663		
<b>2012</b>	(155,129)	(125,222)	29,907		
<b>2014</b>	(156,519)	(126,612)	29,907		
<b>2013-2018</b>	(939,112)	(759,672)	179,439		
<b>10 year total</b>	(1,228,165)	(951,690)	276,475	1,636	0

**Microturbines/LNG - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,596)	(23,363)	18,233		
<b>2010</b>	(41,596)	(23,363)	18,233		
<b>2011</b>	(50,732)	(20,069)	30,663		
<b>2012</b>	(155,020)	(125,114)	29,907		
<b>2014</b>	(156,410)	(126,504)	29,907		
<b>2013-2018</b>	(938,462)	(759,022)	179,439		
<b>10 year total</b>	(1,227,406)	(950,932)	276,475	1,636	0

**Table C-77**  
**Summary of the Number of Electric Motor Replacements of Non-Biogas Engines Required for Alternative B to Be Carbon Neutral**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
SCR	(264,959)	11,516	276,475	1,636	8
Replace ICE with Gas Turbine	(104,642)	9,157	113,799	673	14
Replace ICE Microturbine	(266,520)	9,955	276,475	1,636	7
Replace LFG w LNG, DG w Turbines	(1,228,165)	(951,690)	276,475	1,636	0
Replace LFG w LNG, DG w Microturbines	(1,227,406)	(950,932)	276,475	1,636	0

**Table C-78**  
**Summary of Alternative B Energy Effects Compared to Baseline**

Description	Natural Gas Consumption, MMBtu/yr	Electricity Consumption, MWH/yr	Shaft Work Produced, Hp-Hrs/yr	Diesel Fuel Consumption, gal/yr	LNG Production, MMBtu/yr
SCR	(544,398)	174,100	(59,006)	31,152	
Gas Turbines	(474,039)	229,556	(15,123,937)	38,128	
Micro Turbines	(428,481)	273,408	(15,123,937)	41,241	
Gas Turbines/LNG	(201,395)	558,557	(15,123,937)	38,128	2,374,019
Microturbines/LNG	(181,719)	576,527	(15,123,937)	57,364	2,374,019

**Table C-79**  
**Number of Engines Affected by Alternative C**

Engines	2008	2009	2010	2011	Total
Begin Increased Source Testing	473				473
Begin Inspection & Monitoring	473				473
Install Sampling Infrastructure	503				503
Install AFRC		34			34
Install CEMS - Engine Count		9	28	32	69
Install CEMS - CEMS Count		4	10	10	24
Install CO Analyzer			34	14	48



**Table C-80**  
**Number of Facilities Affected by Alternative C**

Facilities	2008	2009	2010	2011	Total
Begin Increased Source Testing	242				242
Begin Inspection & Monitoring	242				242
Install Sampling Infrastructure	240				240
Install AFRC		16			16
Install CEMS		4	10	10	24
Install CO Analyzer			15	5	20

**Table C-81**  
**Alternative C Total Construction Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	119.7	56.2	16.0	0.11	6.6	6.1	790
<b>2009</b>	36.4	17.1	4.7	0.03	2.0	1.8	19.2
<b>2010</b>	36.4	17.1	4.7	0.03	2.0	1.8	31
<b>2011</b>	36	17	4.7	0.03	2.0	1.8	33

**Table C-82**  
**Alternative C Total Criteria Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	9,032 <u>9,035</u>	54,030 <u>54,048</u>	2,473 <u>2,478</u>	547 <u>547</u>	874 <u>874</u>	872 <u>872</u>	1,237,072
<b>2009</b>	6,853 <u>6,856</u>	22,683 <u>22,701</u>	1,848 <u>1,853</u>	547 <u>547</u>	874 <u>874</u>	872 <u>872</u>	1,246,022
<b>2010</b>	6,828 <u>6,831</u>	22,216 <u>22,234</u>	1,514 <u>1,519</u>	545 <u>545</u>	872 <u>872</u>	871 <u>871</u>	1,238,771
<b>2011</b>	6,784 <u>6,787</u>	21,972 <u>21,990</u>	1,512 <u>1,517</u>	545 <u>545</u>	872 <u>872</u>	871 <u>871</u>	1,238,841

**Table C-83**  
**Alternative C Total Criteria Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
2008	9,152	54,086	2,489	547	880.8	878.6	1,237,862
	<u>9,155</u>	<u>54,104</u>	<u>2,494</u>	<u>547</u>	<u>881.3</u>	<u>879.1</u>	
2009	6,853	22,683	1,848	547	874.0	872.0	1,246,022
	<u>6,856</u>	<u>22,701</u>	<u>1,853</u>	<u>547</u>	<u>874.5</u>	<u>872.5</u>	
2010	6,864	22,233	1,519	545	874.0	872.0	1,238,803
	<u>6,867</u>	<u>22,251</u>	<u>1,524</u>	<u>545</u>	<u>874.5</u>	<u>872.5</u>	
2011	6,820	21,989	1,517	545	874.0	872.0	1,238,875
	<u>6,823</u>	<u>22,007</u>	<u>1,522</u>	<u>545</u>	<u>874.5</u>	<u>872.5</u>	

**Table C-84**  
**Alternative C Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
2008	(43)	(157)	(3)	(5)	3.9	3.4	(12,184)
	<u>(40)</u>	<u>(139)</u>	<u>1</u>	<u>(4)</u>	<u>4.4</u>	<u>3.9</u>	
2009	(2,331)	(32,010)	(974)	(6)	(3)	(3)	(11,244)
	<u>(2,339)</u>	<u>(31,542)</u>	<u>(640)</u>	<u>(4)</u>	<u>(2.4)</u>	<u>(2.7)</u>	
2010	(2,331)	(32,010)	(974)	(6)	(3)	(3)	(11,244)
	<u>(2,328)</u>	<u>(31,992)</u>	<u>(969)</u>	<u>(6)</u>	<u>(2.4)</u>	<u>(2.7)</u>	
2011	(2,375)	(32,254)	(976)	(6)	(3)	(3)	(11,172)
	<u>(2,372)</u>	<u>(32,236)</u>	<u>(971)</u>	<u>(6)</u>	<u>(2.4)</u>	<u>(2.7)</u>	

**Table C-85**  
**Summary of Alternative C Energy Effects Compared Baseline**

Natural Gas Consumption, MMBtu/yr	Electricity Consumption, MWH/yr	Diesel Fuel Consumption, gal/yr
0	2,273	32,528

**Table C-86**  
**Alternative D Total Construction Emissions**

**SCR - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
2008	89.8	42.1	12.0	0.08	5.0	4.6	630
2009	88.9	39.5	11.1	0.08	4.7	4.4	36.5
2010	141.4	61.8	17.6	0.13	7.4	6.9	203
2011	247	106	30.4	0.23	12.9	11.9	727
2012	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Gas Turbines - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
2008	89.8	42.1	12.0	0.08	5.0	4.6	630
2009	88.9	39.5	11.1	0.08	4.7	4.4	36.5
2010	141.4	61.8	17.6	0.13	7.4	6.9	203
2011	247	106	30.4	0.23	12.9	11.9	727
2012	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Microturbines - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
2008	89.8	42.1	12.0	0.08	5.0	4.6	630
2009	88.9	39.5	11.1	0.08	4.7	4.4	36.5
2010	141.4	61.8	17.6	0.13	7.4	6.9	203
2011	247	106	30.4	0.23	12.9	11.9	727
2012	52.5	22.3	6.4	0.05	2.7	2.5	73.0

**Gas Turbines/LNG - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
2008	89.8	42.1	12.0	0.08	5.0	4.6	630
2009	88.9	39.5	11.1	0.08	4.7	4.4	36.5
2010	141.4	61.8	17.6	0.13	7.4	6.9	203
2011	682	291	84.1	0.60	48.4	35.6	2,371
2012	488	206.6	60.2	0.43	38.3	26.2	1,718

**Table C-86 (Concluded)**  
**Alternative D Total Construction Emissions**

**Microturbines/LNG - Construction**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2008</b>	90	42.1	12.0	0.08	5.0	4.6	630
<b>2009</b>	88.9	39.5	11.1	0.08	4.7	4.4	36.5
<b>2010</b>	141.4	61.8	17.6	0.13	7.4	6.9	203
<b>2011</b>	682	291	84.1	0.60	48.4	35.6	2,371
<b>2012</b>	488	206.6	60.2	0.43	38.3	26.2	1,718

**Table C-87**  
**Alternative D Total Criteria Operational Emissions**

**SCR - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	-
<b>2010</b>	5,823	15,757	1,250	534	837	835	1,208,312
	<u>5,828</u>	<u>15,790</u>	<u>1,259</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,345	11,627	1,169	528	821	819	1,197,181
	<u>5,350</u>	<u>11,660</u>	<u>1,178</u>	<u>529</u>	<u>822</u>	<u>820</u>	-
<b>2012</b>	4,125	5,748	627	538	830	829	1233796
<b>2014</b>	4,184	5,766	632	538	833	831	1233823

**Table C-87(Continued)  
Alternative D Total Criteria Operational Emissions**

**Gas Turbines - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	-
<b>2010</b>	5,823	15,757	1,250	534	837	835	1,208,312
	<u>5,828</u>	<u>15,790</u>	<u>1,259</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,339	11,625	1,169	528	821	819	1,197,250
	<u>5,344</u>	<u>11,658</u>	<u>1,178</u>	<u>529</u>	<u>822</u>	<u>820</u>	-
<b>2012</b>	4,825	5,509	495	538	1016	1014	1,231,801
<b>2014</b>	4,884	5,527	500	538	1019	1017	1,231,801

**Microturbines - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	-
<b>2010</b>	5,823	15,757	1,250	534	837	835	1,208,312
	<u>5,828</u>	<u>15,790</u>	<u>1,259</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,339	11,625	1,169	528	821	819	1,197,250
	<u>5,344</u>	<u>11,658</u>	<u>1,178</u>	<u>529</u>	<u>822</u>	<u>820</u>	-
<b>2012</b>	3,860	4,321	600	538	757	756	1,231,915

**Table C-87 (Concluded)**  
**Alternative D Total Criteria Operational Emissions**

**Gas Turbines/LNG - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,440	23,215	1,814	543	860	858	1,232,969
	<u>6,445</u>	<u>23,248</u>	<u>1,823</u>	<u>544</u>	<u>861</u>	<u>859</u>	-
<b>2010</b>	5,823	15,757	1,250	534	837	835	1,208,312
	<u>5,828</u>	<u>15,790</u>	<u>1,259</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,390	11,640	1,173	528	823	821	1,197,500
	<u>5,395</u>	<u>11,673</u>	<u>1,182</u>	<u>529</u>	<u>824</u>	<u>822</u>	-
<b>2012</b>	4,254	4,655	486	211	872	870	1,093,753
<b>2014</b>	4,373	4,692	495	211	878	876	1,094,081

**Microturbines/LNG - Total Operational Emissions**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO2, ton/year
<b>2005 Baseline</b>	9,195	54,243	2,493	551	877	875	1,250,047
<b>2008</b>	8,999	53,867	2,458	544	872	870	1,227,230
	<u>9,004</u>	<u>53,900</u>	<u>2,467</u>	<u>545</u>	<u>873</u>	<u>871</u>	-
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	-
<b>2010</b>	5,823	15,757	1,250	534	837	835	1,208,312
	<u>5,828</u>	<u>15,790</u>	<u>1,259</u>	<u>535</u>	<u>838</u>	<u>836</u>	-
<b>2011</b>	5,390	11,640	1,173	528	823	821	1,197,500
	<u>5,395</u>	<u>11,673</u>	<u>1,182</u>	<u>529</u>	<u>824</u>	<u>822</u>	-
<b>2012</b>	3,870	4,190	531	211	767	765	1,093,861
<b>2014</b>	3,989	4,227	541	211	773	771	1,094,189

**Table C-88**  
**Alternative D Total Criteria Emissions**

**SCR - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	15,818	1,267	534	844	842	1,208,515
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,591	11,733	1,200	529	834	831	1,197,908
	<u>5,596</u>	<u>11,766</u>	<u>1,209</u>	<u>530</u>	<u>835</u>	<u>832</u>	
<b>2012</b>	4,178	5,770	634	538	833	831	1,233,869
	<u>5,420</u>	<u>11,657</u>	<u>1,177</u>	<u>528</u>	<u>825</u>	<u>823</u>	
<b>2014</b>	4,184	5,766	632	538	833	831	1,233,823
	<u>3,706</u>	<u>3,504</u>	<u>425</u>	<u>74</u>	<u>697</u>	<u>696</u>	
<b>2015</b>	<u>3,712</u>	<u>3,500</u>	<u>423</u>	<u>74</u>	<u>697</u>	<u>696</u>	

**Gas Turbines - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	15,818	1,267	534	844	842	1,208,515
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,586	11,731	1,199	529	833	831	1,197,977
	<u>5,591</u>	<u>11,764</u>	<u>1,208</u>	<u>530</u>	<u>834</u>	<u>832</u>	
<b>2012</b>	5,444	11,784	1,189	529	832	830	1,231,874
<b>2014</b>	4,878	5,532	502	538	1,019	1,017	1,231,801
<b>2015</b>	4,884	5,527	500	538	1,019	1,017	

**Table C-88 (Continued)**  
**Alternative D Total Criteria Emissions**

**Microturbines - Total**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	15,818	1,267	534	844	842	1,208,515
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	5,586	11,731	1,199	529	833	831	1,197,977
	<u>5,591</u>	<u>11,764</u>	<u>1,208</u>	<u>530</u>	<u>834</u>	<u>832</u>	
<b>2012</b>	5,463	11,854	1,196	529	837	835	1,231,988
<b>2014</b>	3,913	4,344	607	538	760	758	1,231,915
<b>2015</b>	3,919	4,339	605	538	760	758	

**Gas Turbines/LNG - Total**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	15,818	1,267	534	844	842	1,208,515
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	6,072	11,931	1,257	529	872	857	1,199,871
	<u>6,077</u>	<u>11,964</u>	<u>1,266</u>	<u>530</u>	<u>873</u>	<u>858</u>	
<b>2012</b>	5,944	12,230	1,267	529	896	882	1,095,471
<b>2014</b>	4,742	4,862	546	211	911	896	1,094,081
<b>2015</b>	4,373	4,692	495	211	878	876	



**Table C-88 (Concluded)**  
**Alternative D Total Criteria Emissions**

**Microturbines/LNG - Total**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	9,089	53,909	2,470	543.9	876.8	874.7	1,227,861
	<u>9,094</u>	<u>53,942</u>	<u>2,479</u>	<u>545</u>	<u>878</u>	<u>876</u>	
<b>2009</b>	6,410	22,399	1,790	543	858	856	1,231,763
	<u>6,415</u>	<u>22,432</u>	<u>1,799</u>	<u>544</u>	<u>859</u>	<u>857</u>	
<b>2010</b>	5,964	15,818	1,267	534	844	842	1,208,515
	<u>5,969</u>	<u>15,851</u>	<u>1,276</u>	<u>535</u>	<u>845</u>	<u>843</u>	
<b>2011</b>	6,072	11,931	1,257	529	872	857	1,199,871
	<u>6,077</u>	<u>11,964</u>	<u>1,266</u>	<u>530</u>	<u>873</u>	<u>858</u>	
<b>2012</b>	5,963	12,280	1,272	529	899	885	1,095,579
<b>2014</b>	4,206	3,707	483	75	736	722	1,094,189
<b>2015</b>	3,837	3,537	433	74	703	702	

**Table C-89**  
**Alternative D Total Compared to Baseline**

**SCR - Total Compared to Baseline**

Description	NOx, lb/day	CO, lb/day	VOC, lb/day	SOx, lb/day	PM10, lb/day	PM2.5 lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4	(22,186)
	<u>(100)</u>	<u>(301)</u>	<u>(14)</u>	<u>(6.9)</u>	<u>0.8</u>	<u>0.4</u>	
<b>2009</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)	(41,531)
	<u>(3,225)</u>	<u>(38,392)</u>	<u>(1,217)</u>	<u>(17)</u>	<u>(32)</u>	<u>(32)</u>	
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)	(41,531)
	<u>(3,225)</u>	<u>(38,392)</u>	<u>(1,217)</u>	<u>(17)</u>	<u>(32)</u>	<u>(32)</u>	
<b>2011</b>	(3,603)	(42,510)	(1,293)	(23)	(43)	(44)	(52,139)
	<u>(3,598)</u>	<u>(42,477)</u>	<u>(1,284)</u>	<u>(22)</u>	<u>(42)</u>	<u>(43)</u>	
<b>2012</b>	(5,017)	(48,473)	(1,859)	(13)	(44)	(44)	(16,178)
	<u>(3,775)</u>	<u>(42,586)</u>	<u>(1,315)</u>	<u>(23)</u>	<u>(52)</u>	<u>(52)</u>	
<b>2014</b>	(5,011)	(48,477)	(1,861)	(13)	(44)	(44)	(16,224)
	<u>(5,489)</u>	<u>(50,739)</u>	<u>(2,068)</u>	<u>(477)</u>	<u>(180)</u>	<u>(180)</u>	
<b>2015</b>	<u>(5,483)</u>	<u>(50,743)</u>	<u>(2,070)</u>	<u>(477)</u>	<u>(179)</u>	<u>(179)</u>	

**Table C-89 (Continued)**  
**Alternative D Total Compared to Baseline**

**Gas Turbines - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(23)	(7.5)	(0.1)	0.4	(22,186)
	(100)	(301)	(14)	(6.9)	0.8	0.4	
<b>2009</b>	(3,231)	(38,425)	(1,194)	(18)	(33)	(33)	(41,531)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)	
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)	(41,531)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)	
<b>2011</b>	(3,609)	(42,512)	(1,294)	(23)	(43)	(44)	(52,070)
	(3,603)	(42,479)	(1,285)	(22)	(43)	(43)	
<b>2012</b>	(3,751)	(42,459)	(1,304)	(23)	(44)	(45)	
<b>2014</b>	(4,317)	(48,711)	(1,991)	(13)	142	142	(18,173)
<b>2015</b>	(4,311)	(48,716)	(1,993)	(13)	142	142	(18,246)

**Microturbines - Total Compared to Baseline**

Description	NO <sub>x</sub> , lb/day	CO, lb/day	VOC, lb/day	SO <sub>x</sub> , lb/day	PM <sub>10</sub> , lb/day	PM <sub>2.5</sub> lb/day	CO <sub>2</sub> , ton/year
<b>2008</b>	(106)	(334)	(22)	(7.5)	(0.1)	0.4	(22,186)
	(100)	(301)	(14)	(6.9)	0.8	0.4	
<b>2009</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)	(41,531)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)	
<b>2010</b>	(3,231)	(38,425)	(1,226)	(18)	(33)	(33)	(41,531)
	(3,225)	(38,392)	(1,217)	(17)	(32)	(32)	
<b>2011</b>	(3,609)	(42,512)	(1,294)	(23)	(43)	(44)	(52,070)
	(3,603)	(42,479)	(1,285)	(22)	(43)	(43)	
<b>2012</b>	(5,282)	(49,899)	(1,886)	(13)	(117)	(117)	(18,059)
	(3,732)	(49,389)	(1,297)	(22)	(40)	(40)	
<b>2014</b>	(5,275)	(49,904)	(1,888)	(13)	(117)	(117)	(18,132)
	(5,282)	(49,899)	(1,886)	(13)	(117)	(117)	
<b>2015</b>	(5,275)	(49,904)	(1,888)	(13)	(117)	(117)	

**Table C-89 (Concluded)**  
**Alternative D Total Compared to Baseline**

**Gas Turbines/LNG - Total Compared to Baseline**

<b>Description</b>	<b>NO<sub>x</sub>, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SO<sub>x</sub>, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5 lb/day</b>	<b>CO<sub>2</sub>, ton/year</b>
<b>2008</b>	<del>(106)</del> <u>(100)</u>	<del>(334)</del> <u>(301)</u>	<del>(22)</del> <u>(14)</u>	<del>(7.5)</del> <u>(6.9)</u>	<del>(0.1)</del> <u>0.8</u>	0.4 <u>0.4</u>	<del>(22,186)</del>
<b>2009</b>	<del>(3,231)</del> <u>(3,225)</u>	<del>(38,425)</del> <u>(38,392)</u>	<del>(1,226)</del> <u>(1,217)</u>	<del>(18)</del> <u>(17)</u>	<del>(33)</del> <u>(32)</u>	<del>(33)</del> <u>(32)</u>	<del>(41,531)</del>
<b>2010</b>	<del>(3,231)</del> <u>(3,225)</u>	<del>(38,425)</del> <u>(38,392)</u>	<del>(1,226)</del> <u>(1,217)</u>	<del>(18)</del> <u>(17)</u>	<del>(33)</del> <u>(32)</u>	<del>(33)</del> <u>(32)</u>	<del>(41,531)</del>
<b>2011</b>	<del>(3,123)</del> <u>(3,117)</u>	<del>(42,312)</del> <u>(42,279)</u>	<del>(1,236)</del> <u>(1,227)</u>	<del>(22)</del> <u>(22)</u>	<del>(5)</del> <u>(4)</u>	<del>(18)</del> <u>(17)</u>	<del>(50,176)</del>
<b>2012</b>	<del>(4,453)</del> <u>(3,251)</u>	<del>(49,381)</del> <u>(42,013)</u>	<del>(1,947)</del> <u>(1,226)</u>	<del>(340)</del> <u>(22)</u>	33.7 <u>19.6</u>	21.30 <u>7.24</u>	<del>(154,576)</del>
<b>2014</b>	<del>(4,821)</del> <u>(4,453)</u>	<del>(49,551)</del> <u>(49,381)</u>	<del>(1,998)</del> <u>(1,947)</u>	<del>(340)</del> <u>(340)</u>	1.2 <u>33.7</u>	0.75 <u>21.30</u>	<del>(155,966)</del>
<b>2015</b>	<u>(4,821)</u>	<u>(49,551)</u>	<u>(1,998)</u>	<u>(340)</u>	<u>1.2</u>	<u>0.75</u>	

**Microturbines/LNG - Total Compared to Baseline**

<b>Description</b>	<b>NO<sub>x</sub>, lb/day</b>	<b>CO, lb/day</b>	<b>VOC, lb/day</b>	<b>SO<sub>x</sub>, lb/day</b>	<b>PM10, lb/day</b>	<b>PM2.5 lb/day</b>	<b>CO<sub>2</sub>, ton/year</b>
<b>2008</b>	<del>(106)</del> <u>(100)</u>	<del>(334)</del> <u>(301)</u>	<del>(22)</del> <u>(14)</u>	<del>(7.5)</del> <u>(6.9)</u>	<del>(0.1)</del> <u>0.8</u>	0.4 <u>0.4</u>	<del>(22,186)</del>
<b>2009</b>	<del>(3,231)</del> <u>(3,225)</u>	<del>(38,425)</del> <u>(38,392)</u>	<del>(1,226)</del> <u>(1,217)</u>	<del>(18)</del> <u>(17)</u>	<del>(33)</del> <u>(32)</u>	<del>(33)</del> <u>(32)</u>	<del>(41,531)</del>
<b>2010</b>	<del>(3,231)</del> <u>(3,225)</u>	<del>(38,425)</del> <u>(38,392)</u>	<del>(1,226)</del> <u>(1,217)</u>	<del>(18)</del> <u>(17)</u>	<del>(33)</del> <u>(32)</u>	<del>(33)</del> <u>(32)</u>	<del>(41,531)</del>
<b>2011</b>	<del>(3,123)</del> <u>(3,117)</u>	<del>(42,312)</del> <u>(42,279)</u>	<del>(1,236)</del> <u>(1,227)</u>	<del>(22)</del> <u>(22)</u>	<del>(5)</del> <u>(4)</u>	<del>(18)</del> <u>(17)</u>	<del>(50,176)</del>
<b>2012</b>	<del>(4,837)</del> <u>(3,232)</u>	<del>(49,846)</del> <u>(41,963)</u>	<del>(1,901)</del> <u>(1,220)</u>	<del>(340)</del> <u>(22)</u>	<del>(72)</del> <u>22</u>	<del>(84)</del> <u>10</u>	<del>(154,468)</del>
<b>2014</b>	<del>(5,205)</del> <u>(4,989)</u>	<del>(50,016)</del> <u>(50,536)</u>	<del>(1,952)</del> <u>(2,009)</u>	<del>(340)</del> <u>(477)</u>	<del>(104)</del> <u>(141)</u>	<del>(104)</del> <u>(153)</u>	<del>(155,857)</del>
<b>2015</b>	<u>(5,358)</u>	<u>(50,706)</u>	<u>(2,060)</u>	<u>(477)</u>	<u>(173)</u>	<u>(174)</u>	

**Table C-90**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for**  
**Alternative D to Be Carbon Neutral**

**SCR - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,531)	(22,713)	18,819		
<b>2010</b>	(41,531)	(22,713)	18,819		
<b>2011</b>	(52,139)	(21,001)	31,138		
<b>2012</b>	(16,178)	14,203	30,381		
<b>2014</b>	(16,224)	14,157	30,381		
<b>2013-2018</b>	(97,344)	84,943	182,287		
<b>10 year total</b>	(248,723)	32,719	281,443	1,665	20

**Gas Turbines – Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	121,080	(22,713)	18,819		
<b>2010</b>	(41,531)	(22,713)	18,819		
<b>2011</b>	(52,070)	(20,932)	31,138		
<b>2012</b>	(18,173)	12,208	30,381		
<b>2014</b>	(18,246)	12,135	30,381		
<b>2013-2018</b>	(109,474)	72,813	182,287		
<b>10 year total</b>	(100,168)	18,664	118,831	703	27

**Table C-90 (Continued)**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for Alternative D to Be Carbon Neutral**

**Microturbines - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,531)	(22,713)	18,819		
<b>2010</b>	(41,531)	(22,713)	18,819		
<b>2011</b>	(52,070)	(20,932)	31,138		
<b>2012</b>	(18,059)	12,322	30,381		
<b>2014</b>	(18,132)	12,249	30,381		
<b>2013-2018</b>	(108,790)	73,497	182,287		
<b>10 year total</b>	(261,981)	19,462	281,443	1,665	12

**Gas Turbines/LNG - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,531)	(22,713)	18,819		
<b>2010</b>	(41,531)	(22,713)	18,819		
<b>2011</b>	(50,176)	(19,038)	31,138		
<b>2012</b>	(154,576)	(124,195)	30,381		
<b>2014</b>	(155,966)	(125,585)	30,381		
<b>2013-2018</b>	(935,795)	(753,508)	182,287		
<b>10 year total</b>	(1,223,610)	(942,167)	281,443	1,665	0

**Table C-90 (Concluded)**  
**Estimation of the Number of Electric Motor Replacements of Non-Biogas Engines Required for Alternative D to Be Carbon Neutral**

**Microturbines/LNG - Carbon Neutral Calculation**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
<b>Baseline</b>					
<b>2008</b>	(22,186)	(22,186)	0		
<b>2009</b>	(41,531)	(22,713)	18,819		
<b>2010</b>	(41,531)	(22,713)	18,819		
<b>2011</b>	(50,176)	(19,038)	31,138		
<b>2012</b>	(154,468)	(124,087)	30,381		
<b>2014</b>	(155,857)	(125,476)	30,381		
<b>2013-2018</b>	(935,145)	(752,858)	182,287		
<b>10 year total</b>	(1,222,851)	(941,408)	281,443	1,665	0

**Table C-91**  
**Summary of the Number of Electric Motor Replacements of Non-Biogas Engines Required for Alternative D to Be Carbon Neutral**

Description	Proposed Project CO <sub>2</sub> , ton/year	No Electrification CO <sub>2</sub> , ton/year	Reduction in CO <sub>2</sub> from Electrification	Average CO <sub>2</sub> Savings per Motor	Average No of Motor to Stay Carbon Neutral
SCR	(248,723)	32,719	281,443	1,665	20
Replace ICE with Gas Turbine	(100,168)	18,664	118,831	703	27
Replace ICE Microturbine	(261,981)	19,462	281,443	1,665	12
Replace LFG w LNG, DG w Turbines	(1,223,610)	(942,167)	281,443	1,665	0
Replace LFG w LNG, DG w Microturbines	(1,222,851)	(941,408)	281,443	1,665	0

**Table C-92**  
**Summary of Alternative D Energy Effects Compared to Baseline**

Description	Natural Gas Consumption, MMBtu/yr	Electricity Consumption, MWH/yr	Shaft Work Produced, Hp-Hrs/yr	Diesel Fuel Consumption, gal/yr	LNG Production, MMBtu/yr
SCR	(547,111)	174,100	(59,006)	31,152	
Gas Turbines	(476,752)	229,556	(15,123,937)	38,128	
Micro Turbines	(431,194)	273,408	(15,123,937)	41,241	
Gas Turbines/LNG	(204,108)	558,557	(15,123,937)	38,128	2,374,019
Microturbines/LNG	(184,431)	576,527	(15,123,937)	57,364	2,374,019

**Table C-93**  
**Exception for ICEs That Heat Digester Gas Calculations for Proposed Project, Alternative B and Alternative D**

**Assumptions**

- Two 574 bhp engines and one stand-by engine
- 2006 fuel use:
  - $5.34 \times 10^{10}$  Btu/year of digester gas
  - $2.24 \times 10^{10}$  Btu/year of natural gas
- Therefore,  $7.52 \times 10^{10}$  Btu/year (8.65 MMBtu/hour) total fuel use
- 35 percent heat recovery by boiler
- 31 percent engine efficiency
- 80 percent boiler efficiency
- Engine CO and VOC emission factors are based on source test.
- Engine SOx emission factor is based on 1 grain sulfur per 1000 std cubic feet natural gas (PUC maximum allowable).
- Engine PM10 emission factor from AP-42.
- Boiler CO emission factors based on 50 ppm at three percent oxygen (typical for a firetube boiler).
- Boiler VOC and PM emission factors are from AP-42.

**Estimated Full Load Fuel Use**

$$(574 \text{ bhp} \times 2,545) / (0.31 \text{ engine efficiency}) = 4.71 \text{ MMBtu/hour}$$

**Average Load**

$$(8.65 \text{ MMBtu/hour}) / (2 \text{ engines} \times 4.71 \text{ MMBtu/hour}) = 91.8 \text{ percent}$$

**Estimated Heat Recovery**

$$8.65 \text{ MMBtu/hour} \times 0.35 \text{ heat recovery} = 3.0 \text{ MMBtu/hour}$$

**Fuel Use with 10 Percent Natural Gas**

$$(5.34 \times 10^{10} \text{ Btu/year} \times 10/9) / (8,760 \text{ hour/year}) = 6.77 \text{ MMBtu/hour} \sim 72 \text{ percent load}$$

**Estimated Heat Recovery**

$$6.77 \text{ MMBtu/hour} \times 0.35 \text{ heat recovery} = 2.37 \text{ MMBtu/hour}$$

**Reduced Heat Recovery**

$$3.0 \text{ MMBtu/hour} - 2.37 \text{ MMBtu/hour} = 0.63 \text{ MMBtu/hour}$$

**Stand-by Boiler Size:**

$(0.63 \text{ MMBtu/hour}) / (0.80 \text{ boiler efficiency}) = 0.79 \text{ MMBtu/hour}$

**Reduced Engine Fuel Use**

$8.65 \text{ MMBtu/hour} - 6.77 \text{ MMBtu/hour} = 1.88 \text{ MMBtu/hr}$

**Annual ICE Emissions from Using More Than 10 Percent Natural Gas**

$1.88 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.12 \text{ lb NO}_x/\text{MMBtu} = 162 \text{ lb NO}_x \text{ /year}$

$1.88 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.728 \text{ lb CO/MMBtu} = 985 \text{ lb CO/year}$

$1.88 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.196 \text{ lb VOC/MMBtu} = 265 \text{ lb VOC/year}$

$1.88 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.0134 \text{ lb SO}_x/\text{MMBtu} = 18.1 \text{ lb SO}_x/\text{year}$

$1.88 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.0194 \text{ lb PM}_{10}/\text{MMBtu} = 26.3 \text{ lb PM}_{10}/\text{year}$

$26.3 \text{ lb PM}/\text{year} \times 0.998 \text{ lb PM}_{2.5}/\text{lb PM}_{10} = 26.2 \text{ lb PM}_{2.5}/\text{year}$

$1.88 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 115 \text{ lb CO}_2/\text{MMBtu} = 155,664 \text{ lb CO}_2/\text{year}$

**Daily ICE Emissions from Using More Than 10 Percent Natural Gas**

$1.88 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.12 \text{ lb NO}_x/\text{MMBtu} = 5.4 \text{ lb NO}_x \text{ /day}$

$1.88 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.728 \text{ lb CO/MMBtu} = 32.8 \text{ lb CO/day}$

$1.88 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.196 \text{ lb VOC/MMBtu} = 8.8 \text{ lb VOC/day}$

$1.88 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.0134 \text{ lb SO}_x/\text{MMBtu} = 0.60 \text{ lb SO}_x/\text{day}$

$1.88 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.0194 \text{ lb PM}_{10}/\text{MMBtu} = 0.88 \text{ lb PM}_{10}/\text{day}$

$26.3 \text{ lb PM}/\text{day} \times 0.998 \text{ lb PM}_{2.5}/\text{lb PM}_{10} = 0.88 \text{ lb PM}_{2.5}/\text{day}$

**Summary of Exception for Natural Gas for ICEs That Heat Digester Gas**

<u>Description</u>	<u>NO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>CO</u> <u>Emissions,</u> <u>lb/day</u>	<u>VOC</u> <u>Emissions,</u> <u>lb/day</u>	<u>SO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>10</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>2.5</sub></u> <u>Emissions,</u> <u>lb/day</u>
<u>ICE</u>	<u>5.41</u>	<u>32.85</u>	<u>8.8</u>	<u>0.6</u>	<u>0.88</u>	<u>0.87</u>

**Proposed Project**

<u>Description</u>	<u>NO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>CO</u> <u>Emissions,</u> <u>lb/day</u>	<u>VOC</u> <u>Emissions,</u> <u>lb/day</u>	<u>SO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>10</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>2.5</sub></u> <u>Emissions,</u> <u>lb/day</u>
<u>ICE Exception</u>	<u>5.4</u>	<u>32.8</u>	<u>8.8</u>	<u>0.60</u>	<u>0.88</u>	<u>0.87</u>
<u>Significance Threshold</u>	<u>55</u>	<u>550</u>	<u>75</u>	<u>150</u>	<u>150</u>	<u>55</u>
<u>Significant or</u> <u>Substantial Increase?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>



**Alternative B**

<u>Description</u>	<u>NO<sub>x</sub> Emissions, lb/day</u>	<u>CO Emissions, lb/day</u>	<u>VOC Emissions, lb/day</u>	<u>SO<sub>x</sub> Emissions, lb/day</u>	<u>PM10 Emissions, lb/day</u>	<u>PM2.5 Emissions, lb/day</u>
<u>ICE Exception</u>	<u>5.4</u>	<u>32.8</u>	<u>8.8</u>	<u>0.60</u>	<u>0.88</u>	<u>0.87</u>
<u>Significance Threshold</u>	<u>55</u>	<u>550</u>	<u>75</u>	<u>150</u>	<u>150</u>	<u>55</u>
<u>Significant or Substantial Increase?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

**Alternative D**

<u>Description</u>	<u>NO<sub>x</sub> Emissions, lb/day</u>	<u>CO Emissions, lb/day</u>	<u>VOC Emissions, lb/day</u>	<u>SO<sub>x</sub> Emissions, lb/day</u>	<u>PM10 Emissions, lb/day</u>	<u>PM2.5 Emissions, lb/day</u>
<u>Worst-Case</u>						
<u>ICE Exception</u>	<u>5.41</u>	<u>32.85</u>	<u>8.84</u>	<u>0.60</u>	<u>0.88</u>	<u>0.87</u>
<u>Significance Threshold</u>	<u>55</u>	<u>550</u>	<u>75</u>	<u>150</u>	<u>150</u>	<u>55</u>
<u>Significant or Substantial Increase?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

**Table C-93**  
**Exception for ICEs That Heat Digester Gas Calculations for Alternative C**

**Assumptions**

- Two 574 bhp engines and one stand-by engine
- 2006 fuel use:
  - 5.34 x 10<sup>10</sup> Btu/year of digester gas
  - 2.24 x 10<sup>10</sup> Btu/year of natural gas
- Therefore, 7.52 x 10<sup>10</sup> Btu/year (8.65 MMBtu/hour) total fuel use
- 35 percent heat recovery by boiler
- 31 percent engine efficiency
- 80 percent boiler efficiency
- Engine CO and VOC emission factors are based on source test.
- Engine SO<sub>x</sub> emission factor is based on 1 grain sulfur per 1000 std cubic feet natural gas (PUC maximum allowable).
- Engine PM10 emission factor from AP-42.
- Boiler CO emission factors based on 50 ppm at three percent oxygen (typical for a firetube boiler).
- Boiler VOC and PM emission factors are from AP-42.

**Estimated Full Load Fuel Use**

(574 bhp x 2,545)/(0.31 engine efficiency) = 4.71 MMBtu/hour

**Average Load**

(8.65 MMBtu/hour)/(2 engines x 4.71 MMBtu/hour) = 91.8 percent

**Estimated Heat Recovery**

8.65 MMBtu/hour x 0.35 heat recovery = 3.0 MMBtu/hour

**Fuel Use with 10 Percent Natural Gas**

$(5.34 \times 10^{10} \text{ Btu/year} \times 10/9)/(8,760 \text{ hour/year}) = 6.77 \text{ MMBtu/hour} \sim 72 \text{ percent load}$

**Estimated Heat Recovery**

$6.77 \text{ MMBtu/hour} \times 0.35 \text{ heat recovery} = 2.37 \text{ MMBtu/hour}$

**Reduced Heat Recovery**

$3.0 \text{ MMBtu/hour} - 2.37 \text{ MMBtu/hour} = 0.63 \text{ MMBtu/hour}$

**Stand-by Boiler Size:**

$(0.63 \text{ MMBtu/hour})/(0.80 \text{ boiler efficiency}) = 0.79 \text{ MMBtu/hour}$

**Reduced Engine Fuel Use**

$8.65 \text{ MMBtu/hour} - 6.77 \text{ MMBtu/hour} = 1.88 \text{ MMBtu/hr}$

**Annual ICE Emissions from Using More Than 25 Percent Natural Gas**

$1.03 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.12 \text{ lb NO}_x/\text{MMBtu} = 89 \text{ lb NO}_x/\text{year}$

$1.03 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.728 \text{ lb CO/MMBtu} = 540 \text{ lb CO/year}$

$1.03 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.196 \text{ lb VOC/MMBtu} = 145 \text{ lb VOC/year}$

$1.03 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.0134 \text{ lb SO}_x/\text{MMBtu} = 9.9 \text{ lb SO}_x/\text{year}$

$1.03 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 0.0194 \text{ lb PM}_{10}/\text{MMBtu} = 14.4 \text{ lb PM}_{10}/\text{year}$

$14.4 \text{ lb PM}_{10}/\text{year} \times 0.998 \text{ lb PM}_{2.5}/\text{lb PM}_{10} = 14.4 \text{ lb PM}_{2.5}/\text{year}$

$1.03 \text{ MMBtu/hour} \times 720 \text{ hour/year} \times 115 \text{ lb CO}_2/\text{MMBtu} = 85,295 \text{ lb CO}_2/\text{year}$

**Daily ICE Emissions from Using More Than 25 Percent Natural Gas**

$1.03 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.12 \text{ lb NO}_x/\text{MMBtu} = 3.0 \text{ lb NO}_x/\text{day}$

$1.03 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.728 \text{ lb CO/MMBtu} = 18.0 \text{ lb CO/day}$

$1.03 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.196 \text{ lb VOC/MMBtu} = 4.8 \text{ lb VOC/day}$

$1.03 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.0134 \text{ lb SO}_x/\text{MMBtu} = 0.33 \text{ lb SO}_x/\text{day}$

$0.33 \text{ MMBtu/hour} \times 24 \text{ hour/day} \times 0.0194 \text{ lb PM}_{10}/\text{MMBtu} = 0.48 \text{ lb PM}_{10}/\text{day}$

$26.3 \text{ lb PM}_{10}/\text{day} \times 0.998 \text{ lb PM}_{2.5}/\text{lb PM}_{10} = 0.48 \text{ lb PM}_{2.5}/\text{day}$

**Summary of Exception for Natural Gas for ICEs That Heat Digester Gas**

<u>Description</u>	<u>NO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>CO</u> <u>Emissions,</u> <u>lb/day</u>	<u>VOC</u> <u>Emissions,</u> <u>lb/day</u>	<u>SO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>10</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>2.5</sub></u> <u>Emissions,</u> <u>lb/day</u>
ICE	<u>3.0</u>	<u>18.0</u>	<u>4.8</u>	<u>0.39</u>	<u>0.48</u>	<u>0.48</u>

**Alternative C**

<u>Description</u>	<u>NO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>CO</u> <u>Emissions,</u> <u>lb/day</u>	<u>VOC</u> <u>Emissions,</u> <u>lb/day</u>	<u>SO<sub>x</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>10</sub></u> <u>Emissions,</u> <u>lb/day</u>	<u>PM<sub>2.5</sub></u> <u>Emissions,</u> <u>lb/day</u>
ICE Exception	<u>3.0</u>	<u>18.0</u>	<u>4.8</u>	<u>0.39</u>	<u>0.48</u>	<u>0.48</u>
Significance Threshold	<u>55</u>	<u>550</u>	<u>75</u>	<u>150</u>	<u>150</u>	<u>55</u>
Significant or Substantial Increase?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

**APPENDIX D (of the ~~Draft~~Final EA)**

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**NOTICE OF PREPARATION AND INITIAL STUDY**



**South Coast**  
**Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • <http://www.aqmd.gov>

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL ASSESSMENT**

**PROJECT TITLE: PROPOSED AMENDED RULE 1110.2 – EMISSIONS FROM GASEOUS- AND LIQUID-FUELED INTERNAL COMBUSTION ENGINES (ICES)**

In accordance with the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD), as the Lead Agency, has prepared this Notice of Preparation (NOP) and Initial Study (IS). This NOP serves two purposes: 1) to solicit information on the scope of the environmental analysis for the proposed project, and 2) to notify the public that the SCAQMD will prepare a Draft Environmental Assessment (EA) to further assess potential environmental impacts that may result from implementing the proposed project.

This letter, NOP and the attached IS are not SCAQMD applications or forms requiring a response from you. Their purpose is simply to provide information to you on the above project. If the proposed project has no bearing on you or your organization, no action on your part is necessary.

The SCAQMD has also prepared an Initial Study (IS) for the proposed project, which includes a project description and an environmental checklist. The IS and other relevant documents may be obtained by calling the SCAQMD Public Information Center at (909) 396-2039 or by accessing the SCAQMD's CEQA website at <http://www.aqmd.gov/ceqa/aqmd.html>. Comments can also be sent via facsimile to (909) 396-3324 or e-mail at [jkoizumi@aqmd.gov](mailto:jkoizumi@aqmd.gov). Mr. Koizumi can be reached by calling (909) 396-3234. Comments must be received no later than 5:00 PM on May 25, 2007. Please include the name and phone number of the contact person for your agency. Questions regarding the proposed rule language should be directed to Mr. Martin Kay at (909) 396-3115.

A Public Workshop for the proposed amended rule was held February 6, 2007. The Public Hearing for the proposed project is scheduled for September 7, 2007. (Note: This public meeting date is subject to change.)

**Date:** April 20, 2007

**Signature:** *Steve Smith*

**Title:** Steve Smith, Ph.D.  
Program Supervisor

**Telephone:** (909) 396-3054

**Reference: California Code of Regulations, Title 14, §§15082(a), 15103, and 15375**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
**21865 Copley Drive, Diamond Bar, CA 91765-4182**

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL ASSESSMENT**

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**Project Title:**

Initial Study (IS) for Proposed Amended Rule (PAR) 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs)

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**Project Location:**

South Coast Air Quality Management District: the four-county South Coast Air Basin (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties) and the Riverside County portions of the Salton Sea Air Basin and the Mojave Desert Air Basin.

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**Description of Nature, Purpose, and Beneficiaries of Project:**

The purpose of PAR 1110.2 is to reduce oxides of nitrogen (NO<sub>x</sub>), volatile organic compounds (VOCs) and carbon monoxide (CO) emissions from gaseous and liquid-fueled ICEs. The proposed amendments would affect stationary, non-emergency engines and would increase monitoring requirements; require engines to meet emission standards equivalent to Best Available Control Technology (BACT); require new electrical generating engines to meet the same requirements as large central power plants, and clarify portable engine requirements.

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**Lead Agency:**

South Coast Air Quality Management District

**Division:**

Planning, Rule Development and Area Sources

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**Initial Study and all supporting documentation are available at:**

SCAQMD Headquarters  
21865 Copley Drive  
Diamond Bar, CA 91765

**or by calling:**

(909) 396-2039

**Initial Study is available online by accessing the SCAQMD's website at:**

<http://www.aqmd.gov/ceqa/aqmd.html>

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**The Public Notice of Preparation is provided through the following:**

Los Angeles Times (April 26, 2007)

SCAQMD Website

SCAQMD Mailing List

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**Initial Study Review Period (30-day):**

April 26, 2007 – May 25, 2007

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**Scheduled Public Meeting Dates (subject to change):**

SCAQMD Governing Board Hearing: September 7, 2007, 9:00 a.m.; SCAQMD Headquarters

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**CEQA Scoping Meeting:**

February 6, 2007, 10:00 am; SCAQMD Headquarters

---

**Send CEQA Comments to:**

Mr. James Koizumi

**Phone:**

(909) 396-3234

**Email:**

[jkoizumi@aqmd.gov](mailto:jkoizumi@aqmd.gov)

**Fax:**

(909) 396-3324

---

**Direct Questions on the Rules:**

Mr. Martin Kay

**Phone:**

(909) 396-3115

**Email:**

[mkay@aqmd.gov](mailto:mkay@aqmd.gov)

**Fax Number:**

(909) 396-3252

---

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## Initial Study for:

### Proposed Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines

April 2007

SCAQMD No. 280307JK

#### Executive Officer

Barry R. Wallerstein, D. Env.

#### Deputy Executive Officer

Planning, Rule Development and Area Sources

Elaine Chang, DrPH

#### Assistant Deputy Executive Officer

Planning, Rules, and Area Sources

Laki Tisopoulos, Ph.D., P.E.

#### Planning and Rules Manager

Planning, Rule Development and Area Sources

Susan Nakamura

---

<b>Author:</b>	James Koizumi	Air Quality Specialist
<b>Technical Assistance:</b>	Alfonso Baez, M.S, Howard Lange, Ph.D.	Senior Air Quality Engineer Air Quality Engineer II
<b>Reviewed By:</b>	Marty Kay, P.E., M.S., Mike Harris	Program Supervisor, Planning, Rules, and Area Sources Senior Deputy District Counsel

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
GOVERNING BOARD**

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VICE CHAIRMAN:         S. ROY WILSON, Ed.D.  
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Mayor, Chino  
Cities Representative, San Bernardino County

Vacant  
Governor's Appointee

EXECUTIVE OFFICER:  
BARRY R. WALLERSTEIN, D.Env.

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**Table of Acronyms and Abbreviations**

<b>Acronym/Abbreviation</b>	<b>Description</b>
ACWA	Association of California Water Agencies
AFRC	Air-to-fuel ratio controller
AQMP	Air quality management plan
ASME	American Society Of Mechanical Engineers
ATCM	Airborne Toxic Control Measures
BACT	Best Available Control Technology
BARCT	Best available retrofit control technology
bph	Brake horsepower
BTU	British thermal unit
CARB	California Air Resources Board
Catox	Catalytic oxidation
CEMS	Continuous emission monitoring system
CEQA	California Environmental Quality Act
CI	Compression-ignition
CNG	Compressed natural gas
CO	Carbon monoxide
dBA	Decibels
EA	Environmental Assessment
EEF	electrical energy factor
EGR	Exhaust gas recirculation
ERPG	Emergency Response Planning Guideline
FY	Fiscal year
g	Gram
HHV	High heating value
I&M	Inspection and monitoring
ICE	Internal combustion engine
in	Inches
IS	Initial Study
k	Kilo
kW	Kilowatt
L	Concentration limit
LA DWP	Los Angeles Department of Water and Power
lb	Pound
LPG	liquefied petroleum gas
m	Meter
MDAB	Mojave Desert Air Basin
µg	Micrograms

**Table of Acronyms and Abbreviations (continued)**

<b>Acronym/Abbreviation</b>	<b>Description</b>
MM	Million
MMBtu	Million British thermal units
MMSCF	Million standard cubic feet
MTA	Los Angeles Metropolitan Transportation Agency
MWD	Metropolitan Water District
MW <sub>e</sub>	Electrical megawatt-hours
MW <sub>th</sub> -hours	Thermal megawatt-hours
NG	natural gas
NMHC	Non-methane hydrocarbon
NO <sub>x</sub>	Oxides of nitrogen
NSCR	Non-selective catalytic reduction
NSPS	New Source Performance Standards
O <sub>2</sub>	Oxygen
OSHA	Occupational Safety and Health Administration
Ox Cat	Catalytic oxidation
PAR	Proposed amended rule
PERP	Portable Equipment Registration Program
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5microns in diameter
ppm	Parts per million
ppmdv	Parts per million, dry volume
ppmv	Parts per million by volume
PSC	Pre-stratified charge
R	Ratio
RACT	Retrofit available control technology
RECLAIM	Regional CLean Air Incentives Market
RICE	Reciprocating Internal Combustion Engines
ROG	Reactive organic gas
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
scf	Standard cubic feet
SCR	Selective catalytic reduction
SI	Spark-ignited
SSAB	Salton Sea Air Basin
TAC	Toxic Air Contaminant
TWC	Three-way catalyst

**Table of Acronyms and Abbreviations (continued)**

<b>Acronym/Abbreviation</b>	<b>Description</b>
VOC	Volatile organic compound
W	Watt
WD	Water District
wt	Weight

## **CHAPTER 1 - PROJECT DESCRIPTION**

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**Introduction**

**California Environmental Quality Act**

**Project Location**

**Project Objective**

**Project Description**

**Project Background**

**Emissions Inventory**

**Alternatives**

## INTRODUCTION

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977<sup>1</sup> as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin referred to herein as the district. By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the district<sup>2</sup>. Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP<sup>3</sup>. The 2003 AQMP concluded that major reductions in emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NOx) are necessary to attain the air quality standards for ozone and particulate matter (PM10 and PM2.5).

Rule 1110.2 was adopted in August 1990 to control NOx, carbon monoxide (CO), and VOC from gaseous and liquid-fueled internal combustion engines (ICEs). For all stationary and portable engines over 50 brake horsepower (bhp), it required that either 1) NOx emissions be reduced over 90 percent to one of two compliance limits specified by the rule, or; 2) the engines be permanently removed from service or replaced with electric motors. It was amended in September 1990 to clarify rule language. It was then amended in August and December of 1994 to modify the CO monitoring requirements and to clarify rule language. The amendment of November 1997 eliminated the requirement for continuous monitoring of CO, reduced the source testing requirement from once every year to once every three years, and exempted nonroad engines, including portable engines, from most requirements. The last amendment in June 2005 made the previously exempt agricultural engines subject to the rule.

The objective of proposed amended rule (PAR) 1110.2 is to reduce NOx, VOC and CO emissions from gaseous and liquid-fueled ICE. PAR 1110.2 would partially implement the 2007 AQMP Control Measure MCS-01 – Facility Modernization, which requires facilities to retrofit or replace their equipment to achieve Best Available Control Technology (BACT); emission levels. The proposed amendments would affect stationary, non-emergency engines and would increase monitoring requirements; require to meet emission standards equivalent to BACT; require new electrical generating engines to meet the same requirements as large central power plants, and clarify portable engine requirements. The proposed project would also remove obsolete portable engine requirements from the existing rule.

This Initial Study (IS), prepared pursuant to the California Environmental Quality Act (CEQA), identifies only aesthetics and operational related air pollutant emissions as a potentially significant adverse impact from implementing the proposed project. A Draft Environmental Assessment (EA) will be prepared to analyze whether the potential hazard and hazardous impacts are significant. Any other potentially significant environmental impacts identified through this Notice of Preparation/Initial Study process will also be evaluated and may be considered for further analysis in the Draft EA.

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<sup>1</sup> The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health & Safety Code, §§40400-40540).

<sup>2</sup> Health & Safety Code, §40460 (a).

<sup>3</sup> Health & Safety Code, §40440 (a).

Throughout this document, references to the proposed project or PAR 1110.2 are used interchangeably.

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

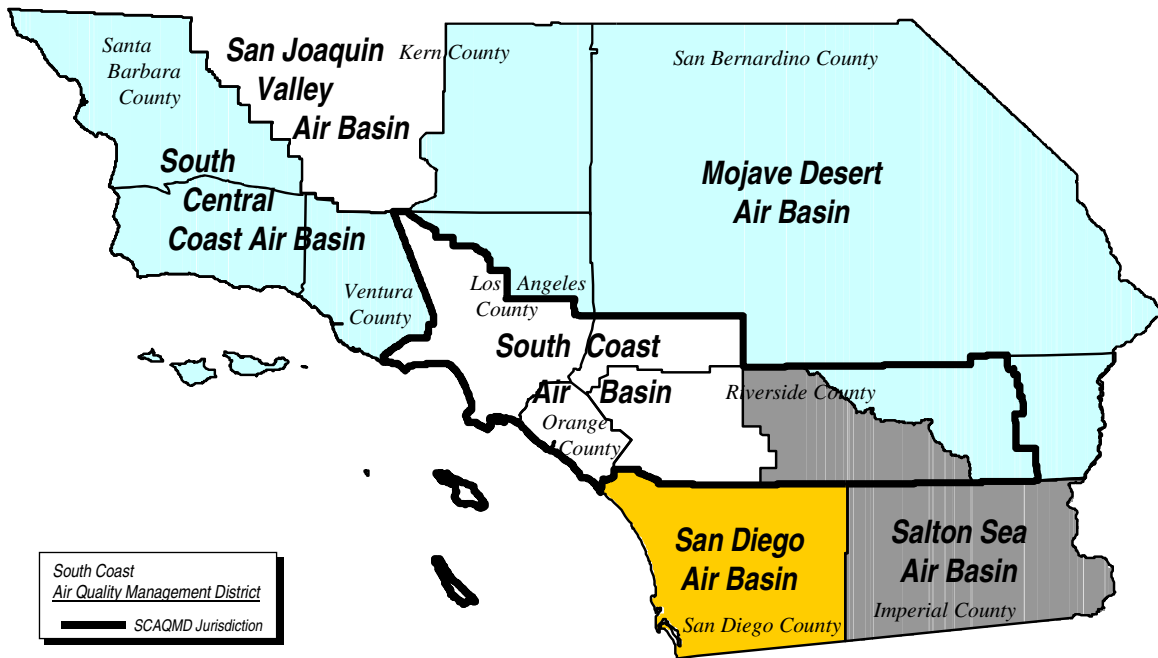
PAR 1110.2 is a “project” as defined by the CEQA. CEQA requires that the potential adverse environmental impacts of proposed projects be evaluated and that methods to reduce or avoid identified significant adverse environmental impacts of these projects be implemented if feasible. The purpose of the CEQA process is to inform the SCAQMD's Governing Board, public agencies, and interested parties of potential adverse environmental impacts that could result from implementing the proposed project and to identify feasible mitigation measures when an impact is significant.

California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written documents in lieu of an environmental impact report once the Secretary of the Resources Agency has certified the regulatory program. The SCAQMD's regulatory program was certified by the Secretary of Resources Agency on March 1, 1989 and is codified as SCAQMD Rule 110. Pursuant to Rule 110 (the rule which implements the SCAQMD's certified regulatory program), SCAQMD is preparing a Draft Environmental Assessment (EA) to evaluate potential adverse impacts from PAR 1110.2.

The SCAQMD as Lead Agency for the proposed project has prepared this IS (which includes an Environmental Checklist). The Environmental Checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. The Initial Study is also intended to provide information about the proposed project to other public agencies and interested parties prior to the release of the Draft EA. Written comments on the scope of the environmental analysis and possible project alternatives received by the SCAQMD during the 30-day review and comment period will be considered when preparing the Draft EA.

### **PROJECT LOCATION**

The SCAQMD has jurisdiction over an area of 10,473 square miles (referred to hereafter as the district), consisting of the four-county South Coast Air Basin (Basin) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD's jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of both Riverside County and the SSAB and is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 1-1).



**Figure 1-1**  
**South Coast Air Quality Management District**

### PROJECT OBJECTIVES

The objective of the project is to partially implement 2007 AQMP Control Measure MSC-01 – Facility Modernization, which requires facilities not participating in the NO<sub>x</sub> Regional Clean Air Incentives Market (RECLAIM) Program to retrofit or replace existing equipment with NO<sub>x</sub> BACT at the end of a predetermined life span. PAR 1110.2 would also increase engine compliance by better monitoring, recordkeeping and reporting. PAR 1110.2 would implement SB 1298 distributed generation emission standards for new electrical generating engines, as well as, address issues EPA has with the current Rule 1110.2.

The purpose of the proposed amendments are to: 1) improve the compliance record of engines with better monitoring, recordkeeping and reporting; and 2) achieve further emission reduction based on the cleanest available technologies.



## PROJECT DESCRIPTION

A summary of the proposed amendments follows:

### Applicability

PAR 1110.2 applies to all stationary and portable engines over 50 rated bhp.

### Definitions

This subdivision lists keywords related to gaseous- and liquid fueled engines and defines them for clarity and to enhance enforceability. A new definition for “oxides of nitrogen” and revised definition of “approved emission control plan” are proposed to simply clarify the intent of the rule. New definitions for “net electrical energy”, “rich-burn engine with a three-way catalyst”, and “useful heat recovered” were developed to support the new requirements previously discussed.

### Requirements

Operators of affected operations would be required to comply with the following requirements by September 7, 2007 unless otherwise stated.

### Stationary Engines

#### *Reduction of the Emission Concentration Limits*

Subparagraph (d)(1)(B) currently limits NO<sub>x</sub>, VOC and CO concentrations to produced by non-biogas (landfill or digester gas)-fired engines 36, 250 and 2000 parts per million, dry volume (ppmvd) respectively. The proposed amendments will reduce these limits by 2010 or 2011 to levels comparable to current BACT.

**Table 1-1  
Proposed Concentration Limits**

<b>CONCENTRATION LIMITS FOR NON- BIOGAS-FIRED ENGINES</b>		
NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
bhp ≥ 500: 36 bhp < 500: 45	250	2000
<b>CONCENTRATION LIMITS EFFECTIVE JULY 1, 2010</b>		
NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
bhp ≥ 500: 11 bhp < 500: 45	bhp ≥ 500: 30 bhp < 500: 250	bhp ≥ 500: 70 bhp < 500: 2000
<b>CONCENTRATION LIMITS EFFECTIVE JULY 1, 2011</b>		
NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
11	30	70

<sup>1</sup> Corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Measured as carbon, corrected to 15 percent oxygen on a dry basis and averaged over 30 minutes.

#### *Revisions to the Efficiency Correction for Stationary Engines*

The current rule in subparagraph (d)(1)(C) allows most stationary engines to upwardly adjust the NO<sub>x</sub> and VOC ppmvd emission limits in Table III based on the actual engine efficiency or the manufacturer’s rated efficiency. More efficient engines are allowed higher ppmvd limits.

The proposed amended subparagraph (d)(1)(C) limits the efficiency correction to biogas-fired engines, requires that the correction be based on actual efficiency from (American Society Of Mechanical Engineers) ASME test procedures, requires the engines to use at least 90 percent biogas on an annual basis, and requires the corrected emission limits to be stated on the operating permit.

### ***Emission Standards for Biogas Engines***

In addition to allowing biogas engines to continue to use an efficiency correction factor, the following emission concentration limits are proposed for biogas-fired engines:

**Table 1-2  
Proposed Concentration Limits for Biogas Engines**

<b>Concentration Limits For Biogas Gas-Fired Engines</b>		
NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
bhp ≥ 500: 36 x ECF <sup>3</sup> bhp < 500: 45 x ECF <sup>3</sup>	Landfill Gas: 40 Digester Gas: 250 x ECF <sup>3</sup>	2000
<b>Concentration Limits Effective July 1, 2012</b>		
NO <sub>x</sub> (ppm) <sup>1</sup>	VOC (ppm) <sup>2</sup>	CO (ppm) <sup>1</sup>
11	30	70

<sup>1</sup> Corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes.

<sup>2</sup> Measured as carbon, corrected to 15 percent oxygen on a dry basis and averaged over 30 minutes.

<sup>3</sup> ECF is the efficiency correction factor.

Initially, only the VOC limit for landfill gas-fired engines would change, to be consistent with other current requirements. In 2012, the emissions limits would drop to BACT levels, just as is proposed for other engines.

### ***Air-to-Fuel Ratio Controllers***

The current rule doesn't require an air-to-fuel ratio controller for ICEs. The proposed amendments require ICEs without a CEMS to install an air-to-fuel ratio controller (AFRC) with an oxygen sensor and feedback control.

### ***Emission Standards for New Non-Emergency Electrical Generation Engines***

New non-emergency electrical generation engines are proposed in subparagraph (d)(1)(F) to be subject to the emission standards in the following table.

**Table 1-3  
Proposed Emission Limits for New Electrical Generation Engines**

<b>Emission Standards for New Electrical Generation Engines</b>	
<b>Pollutant</b>	<b>Emission Standard (lbs/MW-hr)</b>
NO <sub>x</sub>	0.07
CO	0.10
VOC	0.02

These emission standards do not apply to biogas-fired engines or engines installed or issued a permit to construct before September 7, 2007.

For engines that do not produce combined heat and power (CHP), the emission standards are based on the net electrical megawatt-hours ( $MW_e$ -hours) produced. CHP (also known as cogeneration) engines may also take credit for the thermal megawatt-hours ( $MW_{th}$ -hours) of useful heat produced, with one  $MW_{th}$ -hour for each 3.4 million British thermal units (Btus). The thermal energy could take the form of hot water, steam or other medium.

For CHP engines, the operator will choose short-term emission limits in pounds per  $MW_e$ -hours that the engine must meet at all times. The operator will also choose an annual electrical energy factor (EEF), such that when the short-term emission limit is multiplied by the annual EEF, the result does not exceed the values in the Table 1-3. The EEF is the annual net electrical energy produced divided by the sum of the electrical and thermal energy produced. The operator will have to also meet the annual EEF limit.

### **Portable Engines**

Staff proposes to remove the emission limits and related requirements for portable engines in subparagraph (d)(2)(A) and add a reference to the California Air Resources Board (CARB)-adopted, portable diesel (Airborne Toxic Control Measures) ATCM and the Large Spark-Ignition Fleet Requirements, to which some portable engines are subject.

### **Compliance**

The unnecessary existing paragraphs (e)(1) and (e)(3) are proposed for deletion. New paragraphs (e)(3) through (e)(5) propose compliance schedules for non-agricultural engines required to meet the future emission limits, the stationary engine continuous emission monitoring system (CEMS) requirements, and the inspection and monitoring (I&M) plans. The schedules will allow time for review and approval of applications for permits to construct, CEMS application, and I&M plan applications.

New engines will be required to comply with the new CEMS and I&M requirements when they begin operation.

### **Monitoring, Testing and Recordkeeping**

The primary focus of the proposed amendments in this subdivision is to improve the poor compliance record of stationary engines.

### **Additional CEMS Requirements**

The existing subparagraph (f)(1)(A) requires 1000 bhp engines and larger, that produce two million bhp-hours per year or more to have a NO<sub>x</sub> CEMS. The proposed amendments, effective on July 1, 2008, add CO emission monitoring back into the rule in subparagraph (f)(1)(A), as it was before the 1997 amendment. In addition, the CEMS requirement will be extended to stationary engines at facilities with multiple engines at the same location (within 75 feet of each other) that have a cumulative stationary engine horsepower rating of 1,000 bhp or more. To reduce the cost, the CEMS can be time-shared between all engines less than 1,000 bhp.

### **Source Testing for Stationary Engines**

The current requirement of subparagraph (f)(1)(C) is that emission testing be done once every three years. The proposed amendments increase the frequency of source testing every two years, or 8,760 operating hours, whichever occurs first.

In addition, the following source testing reforms are proposed:

- Emissions must be tested at for at least 15 minutes at peak load and for at least 30 minutes during normal operation. The source test can no longer at one load under steady state conditions, unless that is the typical duty cycle. In addition NO<sub>x</sub> and CO must be tested for at least 15 minutes at actual peak load and actual minimum load.
- Pretests to determine if the engine needs repairs will not be allowed.
- The test must be conducted at least 40 operating hours or one week after any engine tuning or maintenance.
- If a test is started and shows non-compliance, it may not be aborted to allow engine tuning or repairs. The test must be completed and reported.
- A source testing contractor approved by SCAQMD must be used.
- A source test protocol must be submitted and approved by the District at least 60 days before the test is conducted. The protocol will also identify the critical parameters that will be measured during the test, as required by the Inspection and Maintenance Plan (discussed later).
- SCAQMD must be notified of the test date.
- The test report must be submitted to SCAQMD within 45 days of the test date. This will assure that noncompliance will be reported.
- The operator must provide source testing facilities including sampling ports in the stack, safe sampling platforms, safe access to sampling platforms, and utilities for test equipment.

### **Inspection and Monitoring (I&M) Plan for Stationary Engines**

An I&M Plan will be added to the rule in subparagraph (f)(1)(D). Except for engines monitored by a CEMS, stationary engine operators will submit to SCAQMD for approval an I&M Plan to assure continued compliance of the engines between source tests. The I&M Plan will include procedures for:

- Establishing acceptable ranges for control equipment parameters and engine operating parameters that source testing or portable analyzer monitoring has shown result in pollutant concentrations within the rule limits. The required parameters include, but are not limited to: engine load; oxygen sensor voltage output or equivalence ratio (AFRC may use either); for rich-burn engines with three-way catalyst systems (TWCs), catalyst inlet and outlet temperatures and the temperature change across the catalyst; and for lean-burn engines with selective catalytic reduction, the reactant flow rate (ammonia or urea).
- Procedures for a diagnosing emission control malfunctions alerting the owner/operator to the malfunction. A malfunction indicator light and audible alarm is required.
- Weekly, or every 150 operating hours, emissions checks by a portable NO<sub>x</sub>, CO and oxygen (O<sub>2</sub>) analyzer. The schedule can be reduced to monthly, or every 750 operating hours if three consecutive weekly tests show compliance. If the monthly test is non-compliant or the oxygen sensor is replaced, then weekly tests must be resumed. In order to representative of actual operation, the test will be conducted at least 72 hours after any engine or control system maintenance or tuning. The portable analyzer will be calibrated, maintained and operated in accordance with the manufacturer's specifications and recommendations and the SCAQMD's "Protocol for the Periodic Monitoring of Nitrogen Oxides, Carbon Monoxide, and Oxygen from Sources Subject to South Coast Air Quality Management District Rule 1110.2"

- At least daily recordkeeping of monitoring data and actions required by the plan, including formats of the recordkeeping;
- Preventive and corrective maintenance, and their schedules;
- For rich-burn engines with TWCs, an emission check will be required when an oxygen sensor set point must be readjusted, or within 24 hours after a new oxygen sensor is installed, to establish new set points at minimum, maximum and midpoint loads.
- Reporting noncompliance to the Executive Officer. If an engine owner/operator finds an engine to be operating outside the acceptable range for control equipment parameters, engine operating parameters, engine exhaust NO<sub>x</sub>, CO, VOC or oxygen concentrations, the owner/operator will: report the noncompliance within one hour in the same manner required by paragraph (b)(1) of Rule 430 – Breakdowns; immediately correct the noncompliance or shut down the engine within 24 hours or the end of an operating cycle, in the same manner as required by subparagraph (b)(3)(iv) of Rule 430; and comply with all requirements of Rule 430 if there was a breakdown.
- Recordkeeping, including formats of the recordkeeping.
- Plan revisions. Before any change in I&M plan operations can be implemented, the revised I&M plan will have to be submitted to and approved by the Executive Officer.

### **Portable Analyzer Training**

In order to assure that persons conducting the portable analyzer testing are properly trained to understand the equipment and the procedures for conducting testing, maintenance and calibration, subparagraph (f)(1)(G) requires persons to take a District-approved training program and obtain a certification issued by the District. SCAQMD intends to conduct the training.

### **Operating Log**

Because dual-fuel engines may consume both liquid and gaseous fuels, proposed paragraph (F)(1)(E) is proposed to require fuel use of both fuels to be logged, instead of either fuel.

### **New Non-Emergency Electrical Generating Engines**

New monitoring procedures are required for the proposed emission standards for new, non-emergency, electrical generating engines. All such engines will be required to monitor: the net electrical output (MW<sub>e</sub>-hours) of the engine generator system, which is the difference between the electrical output of the generator and the electricity consumed by the auxiliary equipment necessary to operate the engine generator and heat recovery equipment; and the useful heat recovered (MW<sub>th</sub>-hours), which is the thermal energy recovered and put to an actual useful purpose.

Emissions in pounds per MW<sub>e</sub>-hour must be calculated based on CEMS data, source tests, and weekly emission checks. Mass emissions will be calculated using an F factor method from EPA 40 CFR 60, Appendix A, Method 19, or other approved method. Because Method 19 does not directly address VOC and CO, necessary conversion factors are provided in the rule. An annual report is required to verify compliance with the annual EEF.

### **Exemptions**

#### **Emergency, Flood Control and Fire Fighting Engines**

The current rule exempts several types of engines from the subdivision (d) emission limits. Paragraph (h)(2) exempts emergency engines while paragraph (h)(3) exempts fire fighting and

flood control engines. The proposed amendments do the following: combine the exemptions into paragraph (h)(2); require all of these engines to operate less than 200 hours per year; and require that permits conditions specifically limit the annual operating hours.

### **Start up Exemption**

The current rule has no exemption during engine startups. The proposed amendments in paragraph (h)(12) will provide an exemption from complying with the emission limits in the rule until emission controls reach operating temperature, but not longer than 15 minutes.

## **PROJECT BACKGROUND**

### **Current Rule 1110.2**

Rule 1110.2 was adopted in August 1990 to control NO<sub>x</sub>, CO, and VOC from gaseous and liquid-fueled ICEs. For all stationary and portable engines over 50 bhp, it required that either 1) NO<sub>x</sub> emissions be reduced over 90 percent to one of two compliance limits specified by the rule, or; 2) the engines be permanently removed from service or replaced with electric motors. It was amended in September 1990 to clarify rule language. It was then amended in August and December of 1994 to modify the CO monitoring requirements and to clarify rule language. The amendment of November 1997 eliminated the requirement for continuous monitoring of CO, reduced the source testing requirement from once every year to once every three years, and exempted nonroad engines, including portable engines, from most requirements. The last amendment in June 2005 made the previously exempt agricultural engines subject to the rule.

### **Regulation XX – RECLAIM**

In 1993 SCAQMD adopted Regulation XX – RECLAIM. This regulation established NO<sub>x</sub> and SO<sub>x</sub> trading market emission reduction program that required over 300 of the largest NO<sub>x</sub> and SO<sub>x</sub> sources in SCAQMD’s jurisdiction to meet the requirements of that program rather than the NO<sub>x</sub> requirements of other SCAQMD Rules. Therefore, while some engines in the SCAQMD’s jurisdiction are not subject to the NO<sub>x</sub> requirements of Rule 1110.2; they are still subject to the VOC and CO requirements of Rule 1110.2.

### **Affected Sources**

PAR 1110.2 applies to stationary and portable reciprocating ICEs over 50 bhp. ICEs generate power by combustion of an air/fuel mixture. In the case of SI engines, a spark plug ignites the air/fuel mixture while a diesel engine relies on heating of the inducted air during the compression stroke to ignite the injected diesel fuel. Most stationary and portable ICEs are used to power pumps, compressors, or electrical generators.

SI engines come in a wide variety of designs such as: two-stroke and four-stroke, rich-burn and lean-burn, turbocharged and naturally-aspirated. SI engines can use one or more fuels, such as natural gas, oil field gas, digester gas, landfill gas, propane, butane, liquefied petroleum gas (LPG), gasoline, methanol and ethanol. ICEs can be used in a wide variety of operating modes such as: emergency operation (i.e. used only during testing, maintenance, and emergencies), seasonal operation, continuous operation, continuous power output, and cyclical power output.

The diesel engine is another type of ICE: specifically, a CI engine, in which the diesel fuel is ignited solely by the high temperature created by compression of the air-fuel mixture, rather than

by a separate source of ignition, such as a spark plug, as is the case with SI engines. Similarly to SI engines, there are both two-stroke and four-stroke diesel engines. Most diesel engines are four-stroke, with larger diesels often two-stroke, mainly the large engines in ships and locomotives.

Diesel engines are most commonly used for portable equipment and emergency stationary generators, fire pumps and water pumps. Stationary diesel engines are also used for more routine use at a few locations that have been exempted from complying with Rule 1110.2. These include engines operated by the US Navy on San Clemente Island, and engines at ski resorts. Some diesel engines at RECLAIM facilities also continue to operate because they were exempted from the NO<sub>x</sub> emission requirements of Rule 1110.2.

Uncontrolled ICEs, even when burning a clean fuel such as natural gas, have extremely high emissions of NO<sub>x</sub>, CO and HC. Diesel engines not only have significant NO<sub>x</sub> emissions but also emit PM which has been identified as a Toxic Air Contaminant (TAC) by the CARB. Once a substance is identified as a TAC, the CARB is required by law to determine if there is a need for further control. CARB has adopted ATCM for stationary and portable diesel engines.

### SCAQMD BACT Guidelines

NO<sub>x</sub>, CO and VOC emission levels for stationary engines that are required by SCAQMD's non-major source BACT guidelines are shown in Table 1-4. These limits are typically met by rich-burn engines with larger three-way catalyst (TWC), along with the air-to-fuel ratio controller (AFRC). Lean-burn engines generally come with low-NO<sub>x</sub> combustion modifications built into the engine by the manufacturer to reduce the emissions part way, and then use SCR plus oxidation catalyst to reduce emissions to BACT levels.

**Table 1-4**  
**SCAQMD BACT Guidelines for Stationary Engines at**  
**Non-Major Polluting Facilities**

Criteria Pollutant	PPMVD, corrected to 15% O <sub>2</sub>				Apparent Reduction by Control Technology	
	Uncontrolled Emission		BACT		Rich-Burn (NSCR), %	Lean-Burn (SCR + CatOx), %
	Rich-Burn	Lean-Burn	Rich-Burn (NSCR)*	Lean-Burn (SCR + CatOx)		
NO <sub>x</sub>	590	1090	10	9	98+	99+
CO	1629	136	69	33	95+	75+
VOC	23	91	29	25	---	73+

\*Assuming engine is 30 percent efficient (HHV basis).

### Compliance Issues with Stationary Engines

**SCAQMD Compliance Testing**

For engine used continuously, it is typical to require an oil change once a month, and tune-ups every two months, including new spark plugs and O2 sensors. The current rule requires no checking of emissions during these numerous engine maintenance operations.

Aside from normal maintenance, engines or emission control systems can fail which can cause excess emissions. The following is list of possible engine or emission control system failures:

- A bad spark plug
- A faulty spark plug wire
- A failed O2 sensor
- A O2 sensor for which the mV signal has drifted
- A catalyst that has plugged due to ash from lubrication oil blowby
- A catalyst that has become deactivated due to poisoning from ash blowby or excess exhaust temperature
- A catalyst that degrades from vibration allowing bypassing of the catalyst
- A failed AFRC
- A AFRC that is not properly recalibrated after an O2 sensor replacement

In recent years, SCAQMD enforcement personnel acquired portable analyzers capable of measuring NOx, CO and O2 concentrations in the exhaust of combustion equipment. These analyzers are not expected to be as accurate as a Method 100.1 source test, but they are easier and faster to set up and use, and can detect emissions and compliance problems. SCAQMD inspectors use the portable analyzers to conduct unannounced emission tests and compliance verification on various types of combustion equipment.

These emission tests have shown that rich-burn ICEs, have very high non-compliance rates and very high excess emissions. The Preliminary Staff Report PAR 1110.2 states that more than half of all engines tested were not in compliance with both NOx and CO emission limits. Rich-burn engines had significantly higher non-compliance rates than lean-burn engines. Extrapolating the results for the tested engines to the entire stationary, non-emergency engine inventory of nearly 1,000 engines results in estimated excess emissions of 1.2 tons per day of NOx and 39.9 tons per day of CO.

To verify that the emission violations had been corrected 37 engines were retested. The compliance rate, however, only improved from 44 percent of all first tests to 65 percent of all retests.

**Compliance Demonstration**

Current regulations require ICEs to demonstrate emission compliance by an emission source test only once every three years. If the tests show non-compliance, only major sources (Title V) are required to report the results to SCAQMD. Based on SCAQMD enforcement compliance testing the three year period between compliance demonstrations does not appear to ensure compliance.



### EPA Guidance

EPA proposed the disapproval of Rule 1110.2 and recommended the following changes to enable approval of the rule:<sup>4</sup>

- An inspection and monitoring plan similar to CARB’ RACT/BARCT document;
- Source testing every two years or 8,760 hours;
- Source testing at peak load as well as at under typical duty cycles; and
- A removal of the exemptions for engines at ski resorts, the far eastern portion of Riverside County, and San Clemente Island.

### Senate Bill 1298

Senate Bill 1298<sup>5</sup> was adopted in 2000 by the California state legislature to close a loophole for small electric generators that were exempt from local district permits and not required to have emission controls. In accordance with the law, CARB adopted the Distributed Generation Certification Program<sup>6</sup> for small generators that are exempt from local district permitting requirements. In SCAQMD, this includes ICE generators of 50 hp or less, microturbines, and fuel cells. As of January 1, 2007 these electrical generation technologies may only be sold in California if they are certified by CARB to have emissions equivalent or better than large central generating stations equipped with BACT.

SB 1298 also established a goal to have local districts require permitted distributed generation (DG) equipment to meet the same emissions levels by the earliest practicable date.

### *DG Technologies that Meet CARB 2007 DG Standards*

CARB has certified that the following DG equipment meet the 2007 standards.

**Table 1-5  
Certified Technologies to CARB 2007 DG Standards**

Company Name	Technology
United Technologies Corporation Fuel Cells	200 kW, Phosphoric Acid Fuel Cell
FuelCell Energy, Inc.	250 kW, DFC300A Fuel Cell
Plug Power Inc.	5 kW, GenSys™ 5C Fuel Cell
FuelCell Energy, Inc.	1 MW, DFC1500 Fuel Cell
Ingersoll-Rand Energy Systems	250 kW, 250SM Microturbine
FuelCell Energy, Inc.	250 kW, DFC300MA Fuel Cell
ReliOn, Inc.	2 kW, T-2000 hydrogen-fueled fuel cell
ReliOn, Inc.	1.2 kW, T-1000 hydrogen-fueled fuel cell

The following DG technologies don’t require CARB certification, because they normally get SCAQMD permits, but they can also meet CARB’s 2007 emission standards:

<sup>4</sup> Memorandum from Andrew Steckel of USEPA to Laki Tisopoulos of SCAQMD dated March 31, 2005.

<sup>5</sup> Sections 41514.9 and 41514.10 of the California State Health and Safety Code

<sup>6</sup> Sections 94200-94214, in Article 3, Subchapter 8, Chapter 1, Division 3 of Title 17, California Code of Regulations

- Kawasaki GPB15X Gas Turbine--1.423 gross MW at ISO conditions (sea level, 59°F), guaranteed emission limits of 2.5 ppm NO<sub>x</sub>, six ppm CO and two ppm VOC, all dry basis, corrected to 15 percent O<sub>2</sub>, down to 70 percent of rated load. These emission limits together with heat input of 20.7 MMBtu/hr (LHV) and 53.7 percent waste heat recovery specified by the manufacturer meet the CARB 2007 standards.
- Large combustion gas turbines with combined heat and power (CHP). These are very similar to the central station combined-cycle power plants that are the basis of the 2007 CARB DG standards.

In addition, facilities may install other DG technologies such as: zero-emission solar or wind DG. All of the above technologies are either inherently low-emission, or will have CEMS to assure proper operation of their add-on emission controls.

## **EMISSIONS INVENTORY**

### **Portable Engines**

CARB estimates that in 2000 17,500 portable diesel engines in California emitted 67.1 tons per day of NO<sub>x</sub>, 6.7 tons per day of reactive organic gas (ROG) and 4.2 tons per day of PM. Emissions in SCAQMD would be about 45 percent of this amount. These emissions should gradually decline as newer CARB-certified portable engines replace older, higher emitting engines.

### **Stationary Non-Agricultural Engines**

The 1990 staff report for proposed Rule 1110.2 estimated that Rule 1110.2 would reduce NO<sub>x</sub> emissions of 1,289 stationary, non-emergency engines from 28.0 tons per day to 2.9 tons per day. Exemptions in 1997 for ski resorts and San Clemente Island increased the allowable emissions by 1.35 tons per day to an estimated 4.25 tons per day.

### **Stationary Engine Survey**

To update this information as well as gather other key information for non-agricultural engines that are affected by the rule, staff conducted a survey in 2005 of non-agricultural, stationary, non-emergency engines. A total of 580 facilities were contacted, and 313 of those facilities responded (54 percent facility response rate). The survey collected data for 631 out of a total of 907 active engines (70 percent response rate based on number of engines).

Emissions were calculated based on fuel consumption data gathered via the survey, Rule 1110.2 or BACT emission limits, and source test data from non-BACT engines. The resulting calculated total emissions for all survey engines were scaled up to account for the 70 percent response rate. The resulting total calculated emissions for all stationary, non-emergency engines in the district, in tons per day, are 2.84 NO<sub>x</sub>, 1.19 VOC and 10.35 CO. The calculated current NO<sub>x</sub> emissions indicate that substantial progress has been made since 1990, and the calculated NO<sub>x</sub> emissions are probably less than the 4.25 tons per day level that was expected.

As mentioned earlier in the report, a program of unannounced compliance testing conducted by SCAQMD's Compliance department revealed that, although engines can generally meet emission limits when emission control systems are properly maintained and adjusted as is generally the case at the time of source testing; emissions during normal operation frequently exceed the emission limits. The tendency for an engine to have excess emissions will differ

depending upon whether it is a rich-burn or lean-burn engine, what emission limits it must meet (BACT or Rule 1110.2) and whether or not it has a CEMS. Table 1-6 shows the average ratio of measured emissions to allowed emissions found in the testing program with engines categorized based on these three parameters.

### Regulation XX - RECLAIM

In 1993 SCAQMD adopted Regulation XX – RECLAIM. This regulation established NO<sub>x</sub> and SO<sub>x</sub> trading market emission reduction program that required over 300 of the largest sources in SCAQMD to meet the requirements of that program rather than the NO<sub>x</sub> requirements of other SCAQMD Rules. Therefore, while some engines in SCAQMD are not subject to the NO<sub>x</sub> requirements of Rule 1110.2; they are still subject to the VOC and CO requirements of Rule 1110.2.

**Table 1-6**  
**Average Ratio of Measured Emission to Allowed Emission Found in Unannounced Testing**

Rich/Lean	Limits	CEMS	Tests	NO <sub>x</sub>	CO
Lean	BACT	No	3	1.81	0.33
Lean	BACT	Yes	7	0.76	0.39
Lean	Rule	No	1	0.89	0.10
Rich	BACT	No	169	5.19	5.21
Rich	BACT	Yes	8	0.11	37.76
Rich	Rule	No	39	2.12	0.70

Excess emissions of both NO<sub>x</sub> and CO were clearly evident from rich-burn engines with BACT limits not having CEMS. Excess emissions of CO were evident from rich-burn engines with BACT limits having CEMS and of NO<sub>x</sub> from rich-burn engines with Rule 1110.2 limits not having CEMS. Although there was some suggestion of excess NO<sub>x</sub> emissions from lean-burn engines with BACT limits not having CEMS, the number of tests was considered too small to be conclusive, and lean-burn engines are less likely to have large exceedances. There were no tests on rich-burn engines with Rule 1110.2 limits having CEMS.

To estimate the extent of excess emissions from the engine population in the district, staff applied factors to the allowed emissions from each engine for which survey data were available. These factors were based on the results of unannounced testing summarized in Table 1-6. To eliminate excess VOC emission from each engine, the CO factor was also applied to VOC based on the general observation that these pollutants generally trend together. Again, scaling the results based on the 70 percent survey response rate, the estimated excess emissions in tons per day are 1.20 NO<sub>x</sub>, 7.01 VOC and 39.9 CO.

Table 1-7 summarizes the calculated emissions based on the survey data, the estimated excess emissions based on the average exceedance factors found in compliance testing and the resulting total calculated/estimated emissions from stationary, non-emergency engines.

**Table 1-7**  
**Emissions from Stationary, Non-Emergency Engines (tons per day)**

Description	NO <sub>x</sub>	CO	VOC
Calculated Based on Limits and Source Tests	2.84	10.35	1.19
Estimated Excess Emissions	1.20	39.9	7.01
Totals	4.04	50.24	8.20

### CONTROL TECHNOLOGY

Without any emission controls, ICEs have the highest emissions of all combustion equipment in terms of emissions per unit of fuel use. Fortunately, there are emission controls for ICEs. They include combustion modifications and add-on control technologies. The types of controls that are used depend on the fuel used and whether the ICE is rich-burn or lean-burn.

### Spark-Ignition (SI) Engine Emissions and Emission Control Technologies

#### SI Engines and Uncontrolled Emissions

SI engines fall into two major design categories. Four-stroke, rich-burn engines are designed to operate close to stoichiometric conditions. In other words, just the necessary amount of air is drawn to combust the fuel and little, if any, more. These engines operate with exhaust gas oxygen content very near zero. The other category is lean-burn engines, which are designed to draw substantially more air than is required for combustion and operate with a high level of exhaust gas oxygen, typically over five percent. Larger engines tend to be lean-burn, and smaller engines tend to be rich-burn. Typical emissions of NO<sub>x</sub>, CO and VOC from uncontrolled natural gas-fired engines are listed in Table 1-8. The emission factors in the table are from U.S. EPA's AP-42<sup>7</sup> NO<sub>x</sub> emissions from engines operating on landfill or digester gas should be significantly lower due to the thermal diluent effect of CO<sub>2</sub> present in these types of waste gas.

**Table 1-8**  
**Uncontrolled Emissions from Natural Gas-Fired SI Engines \***

Description	Rich-Burn, lbs/MMBtu <sub>HHV</sub>	Lean-Burn, lbs/MMBtu <sub>HHV</sub>
NO <sub>x</sub>	2.21	4.08
CO	3.72	0.317
VOC	0.0296	0.118
Description	Rich-Burn, ppmvd at 15% O <sub>2</sub>	Lean-Burn, ppmvd at 15% O <sub>2</sub>
NO <sub>x</sub>	590	1090
CO	1629	139
VOC	23	91

\*g/Bhp-hr = lb/MMBtu x 1.15 / (%EFF<sub>HHV</sub>/100)

ppmvd at 15% O<sub>2</sub> = lb/MMBtu x F (F = 267 for NO<sub>x</sub>, 438 for CO, 767 for VOC as methane)

<sup>7</sup> U.S. EPA AP-42 Compilation of Air Pollution Emission Factors, Tables 3.2-2 and 3.2-3.

### CARB RACT/BARCT Determination

In November 2001, CARB published a (retrofit available control technology) RACT/(best available retrofit control technology) BARCT determination<sup>8</sup> for stationary SI engines. This determination, while not aggressive for CO or VOC, identified a number of NO<sub>x</sub> control technologies that are effective for stationary SI engines (Table 1-9) and recommended significant reductions in NO<sub>x</sub> (Table 1-10). Lean-burn SI engines that are subject only to Rule 1110.2, and not to BACT, will generally be equipped with low-emission combustion improvements, whereas rich-burn SI engines will have a TWC, also known as non-selective catalytic reduction (NSCR), which along with accurate control of the air/fuel ratio to near stoichiometric conditions, simultaneously reduces the three pollutants NO<sub>x</sub>, CO and VOC.

**Table 1-9**  
**NO<sub>x</sub> Control Technologies for Stationary SI Engines**

Technology	NO <sub>x</sub> Reduction Capability, %	Comments
Ignition Timing Retard	15-30	Reduces efficiency by up to five percent
Pre-Stratified Charge (PSC)	80+	Not suitable for lean-burn engines
Low-Emission Combustion Modifications	80+	Pre-combustion chamber, leaning, ignition system improvement, turbocharger, air/fuel ratio control system. Retrofit kits are available for some engines.
Turbocharger with Aftercooler	3-35	
Exhaust Gas Recirculation (EGR)	30	
Non-selective Catalytic Reduction (NSCR)	90+	Three-way catalyst—reduces NO <sub>x</sub> , CO and VOC. Not suitable for lean-burn engines.
Selective Catalytic Reduction (SCR)	80+	Requires injection of urea or ammonia to react with NO <sub>x</sub> . Unreacted ammonia is emitted. Oxidation catalyst is normally included to reduce CO and VOC emissions.

**Table 1-10**  
**CARB NO<sub>x</sub> RACT/BARCT Determination for Stationary SI Engines**  
**(ppmvd corrected to 15 percent O<sub>2</sub>)**

Control	Rich-Burn	Lean-Burn
<b>RACT</b>	90% control or 50 ppm NSCR, PSC for waste gases	80% control or 125 ppm Low-Emission Combustion or SCR
<b>BARCT</b>	96% control or 25 ppm NSCR, Inspection & Maintenance Program Waste Gases: 90% control or 50 ppm PSC	90% control or 65 ppm Low-Emission Combustion Mod's or SCR

<sup>8</sup> CARB, "Determination of Reasonably Available Control Technology and Best Available Retrofit Control Technology for Stationary Spark-Ignited Internal Combustion Engines", November 2001.

### **Rich-Burn Engine Control Technology Issues**

When a rich-burn engine with a TWC and AFRC is properly tuned and source tested, excellent emission reductions are achieved. It is the job of AFRC and O<sub>2</sub> sensor to maintain the engine air to fuel ratio at the right point.

Before the once every three year source test is conducted, engines operators assure that engines are in good operating condition and properly tuned to the correct air-to-fuel ratio.

The oxygen sensor is a critical component of the emission control system. Based on information from several sources, it appears that the O<sub>2</sub> sensor set point that works upon initial startup will not be the proper set point as the O<sub>2</sub> sensor ages<sup>9</sup>. The emissions must be periodically measured and the oxygen sensor set point readjusted.

### ***Rich-Burn Engine Demonstration Projects***

The Rule 1110.2 Industry Stakeholder Work Group, in cooperation with SCAQMD, conducted some projects to demonstrate that modern AFRCs could: control rich-burn engines to comply with Rule 1110.2 and BACT emission limits; and alarm operators when there are excess emissions. The projects did not achieve the desired results. They demonstrated that modern AFRCs are not adequate and that additional periodic monitoring is needed.

### **Biogas Engine Emissions and Control Technologies**

Biogas (digester or landfill gas) engines are a special case. The engines are generally larger four-stroke, lean-burn engines very similar to natural gas engines. Because the facilities have argued that contaminants in the fuel, like siloxane, are incompatible with catalytic after-treatment devices, biogas engines have generally not been required to install oxidation catalysts and SCR units that natural gas engines use. As a result, biogas engine emissions are the highest of all engines, even higher than a diesel engine with BACT.

Figure 1-2 demonstrates that the emissions from biogas engines, even when complying with BACT, far exceed natural gas (NG) engines and large central generating stations.

However, recent developments indicated that new technologies may allow emissions as low as with natural gas engines. Landfills in City of Industry and Brea have installed fuel gas treatment equipment to remove the contaminants and allow catalytic controls. Both have oxidation catalysts, while the City of Industry has also installed SCR for NO<sub>x</sub> control. There are also non-catalytic controls available. A selective non-catalytic NO<sub>x</sub>/VOC and CO control device by NOxTech has been installed on a landfill gas engine in Woodville, California. Landfills in Italy have installed engines with CL.AIR<sup>®</sup> non-catalytic VOC/CO control devices, both available from Jenbacher, part of GE Energy.

### **Diesel Engine Emissions and Emission Control Technologies**

U.S. EPA's AP-42<sup>10</sup> lists uncontrolled industrial diesel engine emissions in terms of grams per bhp-hour as 14.0 NO<sub>x</sub>, 3.03 CO, and 1.12 VOC. Since 1996, nonroad diesel engines have been regulated at the federal and state levels through a certification program requiring that the

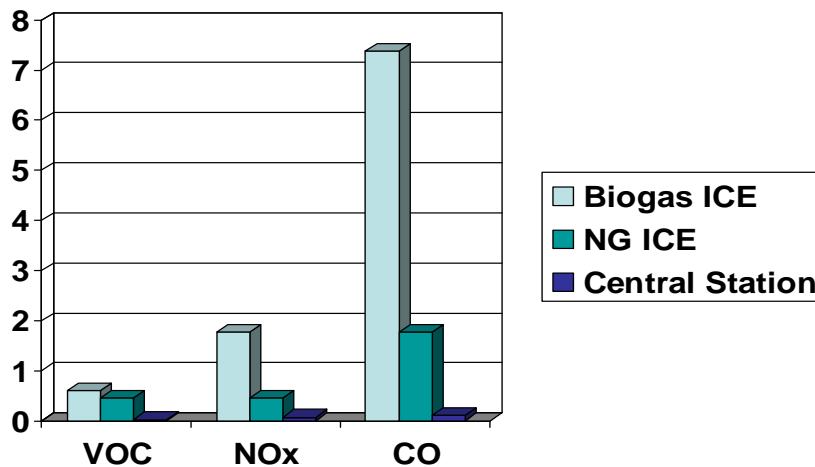
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<sup>9</sup> Eastwood, Chapter Six for a discussion of oxygen sensor aging.

<sup>10</sup> U.S. EPA AP-42 Compilation of Air Pollution Emission Factors, Table 3.3-1.

manufacturers certify their engine models to meet certain emission standards, which become progressively more stringent over time. California's nonroad emission standards are the same as the federal nonroad standards. The nonroad emission standards for gaseous pollutants are shown in Table 1-11. The Tier 4 engines over 75 bhp would comply with Rule 1110.2, but they will not be available until 2014.

**Figure 1-2. BACT for Biogas ICEs, NG ICEs vs. Central Generating Station BACT (lbs/MW-hr)**



Add-on control technologies that are suitable for diesel engines include SCR for NOx and oxidation catalysts for reduction of CO and VOC. Both of these technologies have been successfully applied to diesel engines. SCR involves injection of urea or ammonia into the flue gas upstream of the catalyst and results in emissions of small amounts of unreacted ammonia. Application of these technologies to a large Tier 1 diesel engine located at a ski resort in the SCAQMD achieved the NOx, CO and VOC emissions shown in Table 1-12. Assuming that the engine was designed for emissions to be approximately 20 percent below the Tier 1 standards, the apparent emission reductions achieved by the technologies are 90 percent for NOx, 99 percent for CO and 74 percent for VOC. Because of the high costs of the add-on control equipment for a diesel engine, compared to a SI engine, few diesels were retrofitted to comply with Rule 1110.2. Some became subject to the RECLAIM program, some were exempted from Rule 1110.2 and others were removed from service.

Emulsified fuel is another technology that can be applied to a stationary diesel engine. Emulsified fuel contains water, which has been blended into the fuel using appropriate blending equipment and an additive to create a stable mixture. Separation of the water can, however, occur if the fuel is in storage for too long. Presence of water in the fuel improves combustion while also lowering the flame temperature. It has been applied primarily to on-road and nonroad

diesel engines and primarily for reduction of particulate emissions. However, it reduces NO<sub>x</sub> by only 10 to 20 percent<sup>11</sup>.

Although SO<sub>x</sub> and PM emissions are not addressed by Rule 1110.2, SO<sub>x</sub> emissions are now well controlled with ultra low sulfur diesel fuel (less than 15 ppm by weight) required by Rule 431.2. PM is also well controlled by diesel particulate filters.

**Table 1-11**  
**U.S. EPA Nonroad Diesel Gaseous Emission Standards—NO<sub>x</sub> or**  
**(NO<sub>x</sub>+NMHC)/NMHC/CO (g/Bhp-hr)**

Engine Power, bhp	Tier 1	Tier 2	Tier 3	Tier 4 Interim	Tier 4 Final
50 to <75	<u>1998</u> 6.9	<u>2004</u> (5.6)	<u>2008</u> (3.5)		<u>2012</u> (3.5)
	--	--	--		
	--	3.7	3.7		3.7
75 to <100	<u>1998</u> 6.9	<u>2004</u> (5.6)	<u>2008</u> (3.5)	<u>2012</u> 2.6	<u>2015</u> 0.3
	--	--	--	0.14	0.14
	--	3.7	3.7	3.7	3.7
100 to <175	<u>1997</u> 6.9	<u>2003</u> (4.9)	<u>2007</u> (3.0)	<u>2012</u> 2.6	<u>2015</u> 0.3
	--	--	--	0.14	0.14
	--	3.7	3.7	3.7	3.7
175 to <300	<u>1996</u> 6.9	<u>2003</u> (4.9)	<u>2006</u> (3.0)	<u>2011</u> 1.5	<u>2014</u> 0.3
	1.0	--	--	0.14	0.14
	8.5	2.6	2.6	2.6	2.6
300 to <600	<u>1996</u> 6.9	<u>2001</u> (4.8)	<u>2005</u> (3.0)	<u>2011</u> 1.5	<u>2014</u> 0.3
	1.0	--	--	0.14	0.14
	8.5	2.6	2.6	2.6	2.6
600 to <750	<u>1996</u> 6.9	<u>2002</u> (4.8)	<u>2005</u> (3.0)	<u>2011</u> 1.5	<u>2014</u> 0.3
	1.0	--	--	0.14	0.14
	8.5	2.6	2.6	2.6	2.6
≥750	<u>2000</u> 6.9	<u>2006</u> (4.8)		<u>2011</u> 2.6	<u>2015</u> 2.6
	1.0	--		0.3	0.14
	8.5	2.6		2.6	2.6

Note:  $\text{ppmvdat15\%O}_2 = \text{g/Bhp-hr} \times (\% \text{EFF}_{\text{HHV}}/100) / 1.15 \times F$  (F= 253 for NO<sub>x</sub>, 415 for CO, 727 for VOC as methane)

<sup>11</sup> <http://www.epa.gov/region1/eco/diesel/retrofits.html#doc>



**Table 1-12  
Emission from Diesel Engine at a Ski Resort**

<b>Pollutant</b>	<b>Concentration in Exhaust Gas, ppmvd at 15% O<sub>2</sub></b>	<b>Emission Rate, g/Bhp-hr</b>	<b>Tier 1 Emission Standard, g/Bhp-hr</b>	<b>Apparent Reduction Based on Uncontrolled Level = Tier 1 Less 20%, %</b>
<b>NO<sub>x</sub></b>	45	0.546	6.9	90
<b>CO</b>	5	0.037	8.5	99
<b>VOC</b>	49	0.21	1.0	74
<b>Ammonia</b>	0.6	--	--	--

### **Other Technology Options**

For some stationary engines affected by the proposed Rule 1110.2 amendments, other options may be better than adding control equipment to the existing engine to bring the engine into compliance with the rule. One option for engines that drive pumps or compressors is to replace the engine with an electric motor. Most operators that choose an engine instead of an electric motor did so because of the lower energy cost of natural gas versus electricity. However, due to recent increases in natural gas costs, and the additional costs for engines such as maintenance, permits and source testing, and emission fees, electric motors are now a more attractive option.

For ICE electrical generators, operators may choose to replace the engines with cleaner technologies such as fuel cells, solar photovoltaic systems, or gas turbines. Or they could simply decide to buy the clean electric power available from their electric utility.

### **ALTERNATIVES**

The Draft EA will discuss and compare alternatives to the proposed project as required by CEQA and by SCAQMD Rule 110. Alternatives must include realistic measures for attaining the basic objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative. In addition, the range of alternatives must be sufficient to permit a reasoned choice and it need not include every conceivable project alternative. The key issue is whether the selection and discussion of alternatives fosters informed decision making and public participation. A CEQA document need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Suggestions on alternatives submitted by the public will be evaluated for inclusion in the Draft EA.

SCAQMD Rule 110 does not impose any greater requirements for a discussion of project alternatives in an environmental assessment than is required for an Environmental Impact Report under CEQA. Alternatives will be developed based in part on the major components of the proposed amended rule. The rationale for selecting alternatives rests on CEQA's requirement to present "realistic" alternatives; that is alternatives that can actually be implemented. CEQA requires an evaluation of a "No Project Alternative." SCAQMD's policy document Environmental Justice Program Enhancements for fiscal year (FY) 2002-03, Enhancement II-1 recommends that all SCAQMD CEQA assessments include a feasible project alternative with the lowest air toxics emissions. In other words, for any major equipment or process type under the

scope of the proposed project that creates a significant environmental impact, at least one alternative, where feasible, shall be considered from a “least harmful” perspective with regard to hazardous air emissions.

The Governing Board may choose to adopt any portion or all of any alternative presented in the EA. The Governing Board is able to adopt any portion or all of any of the alternatives because the impacts of each alternative will be fully disclosed to the public and the public will have the opportunity to comment on the alternatives and impacts generated by each alternative.

Written suggestions on potential project alternatives received during the comment period for the Initial Study will be considered when preparing the Draft EA.

## **CHAPTER 2 - ENVIRONMENTAL CHECKLIST**

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**Introduction**

**General Information**

**Environmental Factors Potentially Affected**

**Determination**

**Environmental Checklist and Discussion**

**INTRODUCTION**

The environmental checklist provides a standard evaluation tool to identify a project's potential adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

**GENERAL INFORMATION**

Project Title:	Proposed Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive Diamond Bar, CA 91765
CEQA Contact Person:	Mr. James Koizumi (909) 396-3234
Rule 1110.2 Contact People	Mr. Alfonzo Baez (909) 396-2516 Dr. Howard Lange (909) 396-3658 Mr. Martin Kay (909) 396-3115
Project Sponsor's Name:	South Coast Air Quality Management District
Project Sponsor's Address:	21865 Copley Drive Diamond Bar, CA 91765
General Plan Designation:	Not applicable
Zoning:	Not applicable
Description of Project:	PAR 1110.2 would partially implement 2007 AQMP Control Measure MSC-01 – Facility Modernization. PAR 1110.2 would also increase engine compliance by better monitoring, recordkeeping and reporting. PAR 1110.2 would implement SB 1298 distributed generation emission standards for new electrical generating engines, as well as, address issues EPA has with the current Rule 1110.2. The implementation of PAR 1101.1 is expected to reduce NOx emissions by 5,520 pounds per day, VOCs by 14,762 pounds per day and CO emissions by 93,256 pounds per day.
Surrounding Land Uses and Setting:	Not applicable
Other Public Agencies Whose Approval is Required:	Not applicable

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with an "✓" may be adversely affected by the proposed project. An explanation relative to the determination of impacts can be found following the checklist for each area.

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics                       | <input type="checkbox"/> Agriculture Resources                    | <input checked="" type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources             | <input type="checkbox"/> Cultural Resources                       | <input checked="" type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils                    | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/<br>Water Quality                   |
| <input type="checkbox"/> Land Use/Planning                | <input type="checkbox"/> Mineral Resources                        | <input type="checkbox"/> Noise   |
| <input type="checkbox"/> Population/Housing               | <input type="checkbox"/> Public Services                          | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Solid/Hazardous Waste | <input type="checkbox"/> Transportation/<br>Traffic               | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION**

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: April 20, 2007

Signature: Steve Smith  
 Steve Smith, Ph.D.  
 Program Supervisor

## ENVIRONMENTAL CHECKLIST AND DISCUSSION

As discussed in Chapter 1, the main focus of the proposed rule is to reduce NO<sub>x</sub>, VOC and CO emissions from gaseous- and liquid-fueled ICE. The proposed amendments would increase monitoring requirements; require stationary, non-emergency engines to meet emission standards equivalent to BACT; require new electrical generating engines to meet the same requirements as large central power plants, and clarify portable engine requirements.

Compliance with PAR 1110.2 may require oxidation catalyst, SCR, and replacement of two-stroke engines with electric motors. Facility operators may need to install CEMS, CO analyzers, AFRC and oxygen sensor, and infrastructure to facilitate monitoring and source testing (sampling ports, platforms, ladders, etc.).

### Construction

#### New Gaseous- and Liquid Fueled Engines

PAR 1110.2 would not cause new development. Therefore, PAR 1110.2 is not expected to require the installation of any new engines. PAR 1110.2 may impact the choice of engine installed, BACT installed and monitoring equipment required at new facilities. The number and impact of new engines is speculative and therefore will not be evaluated in this CEQA analysis. However, new engines would be required to enter the permit process before construction. All permitted equipment is required to have a CEQA evaluation. Impacts from the construction of new engines would be evaluated at that time. No change in fuel type is expected.

#### Existing Gaseous- and Liquid Fueled Engines

PAR 1110.2 has a variety of requirements that compliance dates from 2007 to 2012. Most of the construction would occur within the first two years after adoption of the amended rule. Based on a survey of facilities with gaseous- and liquid-fuel engines, SCAQMD staff estimates that 412 engines would require additional source testing (one additional test every six years) staffing in 2007; 620 engine systems would require minor construction to install infrastructure (sampling ports, platforms, safe access and utilities) and air/fuel ratio controllers by June 2008; 490 engines require installation of CO analyzers and/or NO<sub>x</sub>-CO CEMS by July 2008; 22 engines would need replacement with electric motors by July 1, 2010; 30 engines would need oxidation catalyst by July 2011; 300 facilities would need modification of three-way catalyst by July 2011; and 78 would need SCR by July 2012. The Landfill Gas to Energy Coalition is concerned that the cost of install in SCR would make flaring an economical alternative to installing SCR. The possibility replacing engines with flares will be examined in the Draft EIR.

Construction or modification of control technologies, engine replacement with electric motor or installation of infrastructure may require cranes, loaders, forklifts, welders and generator sets. Installation of controllers, analyzers, and CEMS systems are likely to require less heavy equipment. All construction would require delivery truck and worker trips. Based on the above, SCAQMD staff assumes that construction would occur at approximately 15 facilities per day beginning in 2007 through 2008. Between 2009 to 2012, construction would occur at one or two facilities per day.

## Operations

Emission reductions associated with compliant gaseous- and liquid-fueled engines are presented in Chapter 1. The operations of compliant gaseous- and liquid-fueled engines would result in reductions in all criteria and toxic emissions.

PAR 1110.2 compliant gaseous- and liquid-fueled engines control emissions by burning fuel more efficiently because engine improvements, better operation and maintenance; and/or by control technology.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>I. AESTHETICS.</b> Would the project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Significance Criteria

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

## Discussion

**I.a), b), c) & d)** PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

PA 1110.2 would not require any new development, but may require minor modifications to buildings or other structures for retrofit or replacement of existing engines; and new, retrofit, or replacement control equipment and monitoring equipment to comply with the proposed rule. PAR 1110.2 may require replacing or altering existing equipment.



Staff estimates that commercial and industrial facilities may install new, retrofit or replace existing ICE, control technology, and/or monitoring equipment. The retrofitted, replaced or new equipment would be located within the boundaries of existing commercial or industrial facilities near to existing ICE systems. And therefore, would not be substantially different in physical appearance than other existing commercial or industrial equipment at these facilities, it is not expected that the retrofitted, replaced and/or new equipment would obstruct scenic resources or degrade the existing visual character of a site, including but not limited to: trees, rock outcroppings, or historic buildings.

Any new development would not be a result of business decisions and not PAR 1110.2. PAR 1110.2 would affect the type of ICE and control systems installed in new developments. However, it is expected that PAR 1110.2 compliant equipment would be similar in aesthetic character to non-compliant PAR 1110.2. Therefore, installation of PAR 1110.2 compliant equipment is not expected to adversely affect aesthetics.

In addition, retrofitted, replaced or new equipment would require new permits or modifications of existing permits. New and modified permit applications require CEQA review in the form of the 400 CEQA form. Even though no aesthetic impacts are expect from PAR 1110.2, the new, retrofit or replacement equipment will be examined for any potential adverse impacts as apart of the normal permitting process.

Additional light or glare would not be created which would adversely affect day or nighttime views in the area since no light generating equipment would be required to comply with proposed rule.

Based upon these considerations, significant adverse aesthetics impacts are not anticipated and will not be further analyzed in the Draft EA. Since no significant aesthetics impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE RESOURCES.</b> Would the project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Project-related impacts on agricultural resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural uses.

### Discussion

**II.a), b), & c)** PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

### Existing Facilities

PAR 1110.2 may require replacing or altering existing equipment. Any replacement or retrofit construction would occur at existing commercial or industrial facilities. Therefore, PAR 1110.2 is not expected to convert any classification of farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract.

In addition, retrofitted, replaced or new equipment would require new permits or modifications of existing permits. New and modified permit applications require CEQA review in the form of the 400 CEQA form. Even though no agricultural impacts are expected from PAR 1110.2, the new, retrofit or replacement equipment will be examined for any potential adverse impacts as apart of the normal permitting process.

### New Development

PAR 1110.2 would not require any new development, but may require minor modifications to buildings or other structures for retrofit or replacement of existing engines; and new, retrofit, or replacement control equipment and monitoring equipment to comply with the proposed rule. New development may be impacted by PAR 1110.2; however, PAR 1110.2 would not be direct or indirect cause of the new development. Similar construction at existing facilities, construction

of ICEs, control technology and monitoring equipment is expected to be pre-manufactured and dropped in place.

Based upon these considerations, significant agricultural resource impacts are not anticipated and will not be further analyzed in the Draft EA. Since no significant agriculture resources impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**III.a) and f)** Attainment of the state and federal ambient air quality standards protects sensitive receptors and the public in general from the adverse effects of criteria pollutants which are known to have adverse human health effects. PAR 1110.2 contributes directly to carrying out the goals of the 2007 Draft AQMP by implementing control measure MSC-01 – Facility Modernization. Consistent with control measure MSC-01, PAR 1110.2 is expected to reduce NO<sub>x</sub>, VOC and CO emissions from all affected source categories, which in turn, will contribute to attaining the state and federal ambient air quality standards. Thus, because PAR 1110.2 implements control measure MSC-01 from the 2007 Draft AQMP, it is not expected to conflict or obstruct implementation of the applicable AQMP.

PAR 1110.2 would make emission limits, monitoring and reporting more stringent. PAR 1110.2 would not diminish the requirements of any other rule or regulation. Therefore, implementing PAR 1110.2 would not diminish an existing air quality rule or future compliance requirement, nor conflict with or obstruct implementation of the applicable air quality plan.

While there are no significance thresholds for greenhouse gases, CO<sub>2</sub> emissions from PAR 1110.2 will be reported in the Draft EA for completeness.

### **III.b) & c)**

#### **Air Quality Significance Criteria**

To determine whether or not air quality impacts from adopting and implementing the proposed amendments are significant, impacts will be evaluated and compared to the following criteria. The project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 2-1 are equaled or exceeded.

#### **Construction Air Quality Impacts**

##### **Criteria Emissions**

Based on a survey of facilities with gaseous- and liquid-fuel engines, SCAQMD staff estimates that 412 engines would require additional source testing g(one additional test every six years) staffing in 2007; 620 engine systems would require minor construction to install infrastructure (sampling ports, platforms, safe access and utilities) and air/fuel ratio controllers by June 2008; 490 engines require installation of CO analyzers and/or NO<sub>x</sub>-CO CEMS by July 2008; 22 engines would need replacement with electric motors by July 1, 2010; 30 engines would need oxidation catalyst by July 2011; 300 facilities would need modification of three-way catalyst by July 2011; and 78 would need SCR by July 2012. The Landfill Gas to Energy Coalition is concerned that the cost of install in SCR would make flaring an economical alternative to installing SCR. The possibility replacing engines with flares will be examined in the Draft EIR. If it is found that replacing engines with flares is probable, construction emissions from replacement of engines with flares will be analyzed.

Construction or modification of control technologies, engine replacement with electric motor or installation of infrastructure may require cranes, loaders, forklifts, welders and generator sets. Installation of controllers, analyzers, and CEMS systems are likely to require less heavy equipment. All construction would require delivery truck and worker trips. Construction will be evaluated based on the expected number of facilities expected to be affected and the construction schedule. Overlapping construction at the affect facilities may generate significant criteria emissions. Criteria emissions from construction will be analyzed in the Draft EIR.

##### **Toxic Emissions**

Diesel exhaust particulate has carcinogenic and chronic non-carcinogenic effects. Diesel exhaust particulate does not have acute health risk values. Carcinogenic health risk is estimated over 70 years for sensitive and residential receptors and 40-years for worker receptors. Construction at any facility is expected to be limited to 32 hours (installation of SCR). Construction for other requirements is expected to last one or two days. Carcinogenic and chronic non-carcinogenic health risks are estimated from annual concentrations. Since the duration of construction for

PAR 1110.2 is much shorter than 70 and 40 years, carcinogenic and chronic non-carcinogenic health risk is expected to be less than significant.

**Table 2-1  
Air Quality Significance Thresholds**

<b>Mass Daily Thresholds</b>		
<b>Pollutant</b>	<b>Construction</b>	<b>Operation</b>
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
<b>Toxic Air Contaminants (TACs) and Odor Thresholds</b>		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Hazard Index $\geq$ 1.0 (project increment) Hazard Index $\geq$ 3.0 (facility-wide)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>Ambient Air Quality for Criteria Pollutants <sup>a</sup></b>		
NO2  1-hour average annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.25 ppm (state) 0.053 ppm (federal)	
PM10 24-hour average annual geometric average annual arithmetic mean	10.4 $\mu\text{g}/\text{m}^3$ (recommended for construction) <sup>b</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$ 20 $\mu\text{g}/\text{m}^3$	
Sulfate 24-hour average	1 $\mu\text{g}/\text{m}^3$	
CO  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	

<sup>a</sup> Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

<sup>b</sup> Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day    ppm = parts per million     $\mu\text{g}/\text{m}^3$  = microgram per cubic meter     $\geq$  greater than or equal to

**Operational Air Quality Impacts**

PAR 1110.2 would reduce ozone and particulate emissions from gaseous- and liquid-fueled ICEs. PAR 1110.2 would reduce NOx emission by 5,520 pounds per day, VOC emission by 14,762 pounds per day, and CO emissions by 93,256 pounds per day. Table 2-2 presents estimated emission. Table 2-3 presents estimated emission reductions.

**Table 2-2  
Estimated Emissions**

<b>Description</b>	<b>NO<sub>x</sub>, ton/day</b>	<b>CO, ton/day</b>	<b>VOC, ton/day</b>
Calculated Baseline	2.84	10.35	1.19
Estimated Actual Baseline (Including Excess Emissions)	4.04	50.24	8.2
Estimated Emissions beginning 6/1/2007	3.98	49.95	8.17
Estimated Emissions beginning 7/1/2008	2.77	10.21	1.18
Estimated Emissions beginning 7/1/2010	2.54	8.15	0.95
Estimated Emissions beginning 7/1/2011	2.34	7.26	0.93
Estimated Emissions beginning 7/1/2012	1.28	3.61	0.82

**Table 2-3  
Estimated Emission Reductions**

<b>Description</b>	<b>NO<sub>x</sub>, ton/day</b>	<b>CO, ton/day</b>	<b>VOC, ton/day</b>
Estimated Emission Reductions beginning 6/1/2007	0.056	0.30	0.027
Estimated Emission Reductions beginning 7/1/2008	1.21	39.74	6.99
Estimated Emission Reductions beginning 7/1/2010	0.23	2.06	0.23
Estimated Emission Reductions beginning 7/1/2011	0.2	0.89	0.02
Estimated Emission Reductions beginning 7/1/2012	1.06	3.65	0.11
<b>Total</b>	<b>2.76</b>	<b>46.64</b>	<b>7.38</b>

The Landfill Gas to Energy Coalition is concerned that the cost of install in SCR would make flaring an economical alternative to installing SCR. The possibility replacing engines with flares will be examined in the Draft EIR. If it is found that replacing engines with flares is probable, operational emissions from replacement of engines with flares will be analyzed.

### **Summary**

The overall objective of the proposed project is to reduce NO<sub>x</sub>, VOC and CO emissions from gaseous- and liquid-fueled internal combustion engines. PAR 1110.2 would reduce emissions through engine replacement, control equipment, monitoring equipment and recordkeeping.

### **Health Risk Analysis**

PAR 1110.2 would reduce health risk by reducing VOCs from gaseous- and liquid fueled ICE. Diesel exhaust particulate matter is a known carcinogen with chronic non-carcinogenic effects. Gasoline and natural gas exhaust contains benzene, ethylbenzene, toluene, xylenes, PAHs and other toxics. Therefore, by reducing VOCs, PAR 1110.2 indirectly reduces air toxics, which reduces associated health risks.

PAR 1110.2 includes requirements for the installation of SCR systems, which uses ammonia NO<sub>x</sub> emissions. A typical SCR system design consists of an ammonia storage tank, ammonia vaporization and injection equipment, a booster fan for the flue gas exhaust, an SCR reactor with catalyst, an exhaust stack plus ancillary electronic instrumentation and operations control equipment. The way an SCR system reduces NO<sub>x</sub> is by a matrix of nozzles injecting a mixture of ammonia and air directly into the flue gas exhaust stream from the combustion equipment. As

this mixture flows into the SCR reactor that is replete with catalyst, the catalyst, ammonia, and oxygen (from the air) in the flue gas exhaust reacts primarily (i.e., selectively) with NO and NO<sub>2</sub> to form nitrogen and water in the presence of a catalyst. The amount of ammonia introduced into the SCR system is approximately a one-to-one molar ratio of ammonia to NO<sub>x</sub> for optimum control efficiency, though the ratio may vary based on equipment-specific NO<sub>x</sub> reduction requirements. Unreacted ammonia which escapes from the stack is commonly referred to as ‘ammonia slip.’ Depending on the type of combustion equipment utilizing SCR technology, the typical amount of ammonia slip can vary between five parts per million by volume (ppmv) when the catalyst is fresh and 20 ppmv at the end of the catalyst life, which is generally about five years.

Ammonia is the primary hazardous chemical identified with the proposed project. Ammonia, though not a carcinogen, can have chronic and acute health impacts. Staff estimates approximately 3.64 pounds of ammonia per bhp would be required to reduce NO<sub>x</sub>. Health risk from ammonia emissions will be evaluated in the Draft EIR.

**III.d)** Because operational criteria emissions would be reduced, affected facilities are not expected to expose sensitive receptors to substantial operational criteria pollutant concentrations from the implementation of PAR 1110.2. However, because construction criteria pollutant emissions and ammonia emissions during operations may be significant, further evaluation will be presented in the Draft EIR.

**III.e)** Historically, the SCAQMD has enforced odor nuisance complaints through SCAQMD Rule 402 - Nuisance. Affected facilities are not expected to create objectionable odors affecting a substantial number of people for the following reasons: 1) new installation of compliant ICE systems would be the same as installation of non-compliant ICE systems; and 2) PAR 1110.2 would reduce the emissions and therefore reduce odors; and installation of compliant ICE systems does not require much heavy construction (forklifts and cranes at some facilities), which is often a source of odors from diesel combustion.

### **Conclusion**

Based on the preceding discussion, PAR 1110.2 is expected to reduce NO<sub>x</sub>, VOC and CO emissions by 5,520, 14,762, and 93,256 pounds per day, respectively, which is an air quality benefit. The proposal has no provision that would cause a violation of any air quality standard or directly contribute to an existing or projected air quality violation. The lower NO<sub>x</sub>, VOC and CO emissions from gaseous- and liquid ICEs would assist in reducing overall NO<sub>x</sub>, VOC and CO emissions throughout the district. Thus, PAR 1110.2 is not expected to result in significant criteria pollutant operational adverse air quality impacts.

Construction air quality impacts and ammonia health risk from implementing PAR 1110.2 will be evaluated in the Draft EIR, air quality impacts are not considered to be cumulatively considerable as defined in CEQA Guidelines §15065(c). Therefore, the proposed project is not expected to result in significant adverse cumulative impacts for any criteria pollutant.

If construction air quality impacts and ammonia health risk are found to be significant in the Draft EIR, mitigation measures will be identified.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



**Significance Criteria**

Impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

**Discussion**

PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

**IV.a), b), c), & d)** PA 1110.2 would not require any new development, but may require minor modifications to buildings or other structures for retrofit or replacement of existing engines; and new, retrofit, or replacement control equipment and monitoring equipment to comply with the proposed rule. PAR 1110.2 may require replacing or altering existing equipment. Any new, replacement or retrofit construction would occur at existing commercial or industrial facilities, so new use designations, including biological habitats, are not expected to be altered by the proposed project. Any construction would occur at affected facilities that are already in existence, which means that Greenfield properties have already been disturbed, but not as a result of PAR 1110.5. Any new operations that must comply with PAR 1110.2 are constructed for business reasons other than to comply with PAR 1110.2. Such projects may or may not have adverse impacts on biological resources. However, these projects would be built regardless of whether or not PAR 1110.2 is in effect.

New, retrofit or replacement construction at existing facilities is expected to occur within the boundaries of the existing facilities. The affected sites are expected have been previously disturbed by site preparation, grating, and construction for the existing gaseous- or liquid-fueled ICE systems. Because of combustion hazards associated with the existing ICE and control systems, it is expect that these areas would be void of biological activity for safety and fire prevention reasons. Therefore, any new, retrofit or replacement construction at existing facilities is not expected to occur in areas that would impact biological resources.

In addition, reducing NO<sub>x</sub>, VOC, and CO emissions from gaseous- and liquid-fueled ICEs would reduce acid deposition and ozone which impact cultural or historic resources downwind. As a result, PR 1110.2 would not directly or indirectly aversely affect riparian habitat, federally protected wetlands, or migratory corridors. For the same reasons PAR 1110.2 is not expected to adversely affect special status plants, animals, or natural communities.

**IV.e) & f)** PAR 1110.2 would not conflict with local policies or ordinances protecting biological resources nor local, regional, or state conservation plans because it will only affect industrial or commercial ICE operations. Additionally, PAR 1110.2 will not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan for the same reason.

The SCAQMD, as the Lead Agency for the proposed project, has found that, when considering the record as a whole, there is no evidence that the proposed project will have potential for any new adverse effects on wildlife resources or the habitat upon which wildlife depends. Accordingly, based upon the preceding information, the SCAQMD has, on the basis of substantial evidence, rebutted the presumption of adverse effect contained in §753.5 (d), Title 14 of the California Code of Regulations.

Based upon these considerations, significant adverse biological resources impacts are not anticipated and will not be further analyzed in the Draft EA. Since no significant adverse biological resources impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES.</b> Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside a formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

PAR 1110.2 would reduce NOx, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

**V.a)** PAR 1110.2 may require replacing or altering existing equipment. Commercial and industrial facilities that operate gaseous- or liquid-fueled ICEs are not expect to be cultural

resources. The affected sites are expected have been previously disturbed by site preparation, grating, and construction for the existing gaseous- or liquid-fueled ICE systems.

Significant adverse impacts to cultural resources that are not listed in historical registries or located in historical preservation overlay zones are not expected for the following reasons. Compliant engines, control technology and monitoring equipment are typically prefabricated and dropped into place at the affected site. Therefore, it is not expected that construction or operation would impact historical or cultural resources surround the affected site. As a result, complying with PR 1110.2 would not require demolition, destruction, relocation or alteration of a resource or its immediate surrounding such that the significance of a cultural resource defined in CEQA Guidelines §15064.5 would be impaired. In addition, reducing NOx, VOC emissions from gaseous- and liquid-fueled ICEs would reduce acid deposition and ozone which impact cultural or historic resources downwind.

**V, b), c), & d)** PAR 1110.2 would not require any new development, but may require minor modifications to buildings or other structures for retrofit or replacement of existing engines; and new, retrofit, or replacement control equipment and monitoring equipment to comply with the proposed rule. New commercial or industrial development may adversely affect cultural resources. However, any new operations that must comply with PAR 1110.2 are constructed for business reasons other than to comply with PAR 1110.2. These development projects would be built regardless of whether or not PAR 1110.2 is in effect.

PAR 1110.2 is not expected to require physical changes to the environment, which may disturb paleontological or archaeological resources. Furthermore, it is envisioned that the areas where existing ICE systems are used are already either devoid of significant cultural resources or whose cultural resources have been previously disturbed.

Based upon these considerations, significant adverse cultural resources impacts are not expected from the implementing PAR 1110.2 and will not be further assessed in the Draft EA. Since no significant cultural resources impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>VI. ENERGY.</b> Would the project:			
a) Conflict with adopted energy conservation plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or substantially altered power or natural gas utility systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with existing energy standards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Significance Criteria

Impacts to energy and mineral resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

### Discussion

PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

PAR 1110.2 would not promote the installation of gaseous- or liquid-fueled engines, but may require the installation or modification of emissions control, sensors, analyzers, CEMS and infrastructure.

**VI.a), b), c), d)& e)** The Landfill Gas to Energy Coalition is concerned that the cost of the SCR requirement would make flaring gas more economically appealing.

There are several renewable energy goals that have been proposed. The 2002 Renewable Portfolio Standard Program recommended a goal of 20 percent the states electricity mix by 2017. The 2003 Integrated Energy Policy Report recommended achieving 20 percent by 2010. The 2004 Energy Report Update and Energy Action Plan recommended 33 percent by 2020.<sup>12</sup> If landfill gas facility operators would switch from engines to flares because SCR systems would be economically infeasible, then PAR 1110.2 may impact renewable energy plans and existing energy standards..

<sup>12</sup> <http://www.energy.ca.gov/renewables/>

In addition, if landfill gas facility operators would switch from engines to flares, this may significantly affect power and natural gas utility systems, and local or regional energy supplies at least renewable energy power and natural gas utility systems and supplies.

The Association of California Water Agencies has stated that PAR 1110.2 would severely restrict the ability of water agencies from providing water during power outages. PAR 1110.2 would not affect the water agencies from delivering water during power outages. PAR 1110.2 would not restrict the use of natural gas engines. PAR 1110.2 may require natural gas engines to install new or retrofit monitoring and control equipment, and increase compliance testing on existing engines. The installation of new or retrofit monitoring and control equipment, and increase compliance testing is not expected to impact water supply during power outages. Water districts are expected to provide the appropriate infrastructure to provide water to their customers. Therefore, PAR 1110.2 is not expected to impact water supply during power outages.

As a result, PAR 1110.2 may conflict with energy conservation plans, affect renewable resources result in the need for new or substantially altered power or natural gas systems and supplies. These impact issues will be analyzed in the Draft EA.

**VI.** The primary effect of implementing PAR 1110.2 is that gaseous- and liquid-fueled ICE would need to be compliant with the proposed rule. Staff estimates that affected commercial and industrial facility operators may require control technology, CO analyzers, AFRC, CEMS or access infrastructure.

### **Natural Gas Impacts**

SCR units would generate a pressure drop through the catalyst and reduce engine efficiency. Non generator engines would require additional natural gas. Based on the pressure drop and reduction of engine efficiency approximately 218 million standard cubic feet (MMscf) of natural gas per year would be required for non generator SCR systems pursuant to PAR 1110.2. Approximately 2.9 MMscf of natural gas would be required for non-generator oxidation catalytic systems. Sixteen two-stroke engines are expected to be replaced with electric motors. Approximately 2,469 MMscf of natural gas per year would be saved by replacing the 22 two-stroke engines with electric motors. Therefore, natural gas usage would be reduced by 2,248 MMscf per year (2,469 – 218 – 2.9 MMscf). Since the total amount of natural gas would be reduced by PAR 1110.2, the proposed project would benefit natural gas reserves in the district. Therefore, PAR 1110.2 is not expected to create any significant effects on local or regional natural gas energy supplies and on requirements for additional energy from natural gas.

Hanover Compressed Natural Gas Company (“Hanover”) operates compressed natural gas (CNG) refueling stations for the Los Angeles Metropolitan Transportation Agency (MTA) transit buses. Hanover has stated that the cost impacts from additional monitoring equipment, change of catalyst, compliance and recordkeeping would be cost prohibitive for their engines. If Hanover operators do replace natural gas engines with electric motors, there will be an additional natural gas benefit. Reduction in natural gas from the conversion of natural gas engines to electric motors was not included in the natural gas analysis.

Table 2-4 presents the maximum natural gas usage by 2012, when the SCR unit and two stroke engine requirements are expected to be completed.

### Electrical Impacts

CEMS, controllers, oxidation catalyst and SCR units use electricity for ancillary equipment (e.g., fans, motors, etc.). Electric motors are completely operated by electricity for both ancillary equipment (e.g., fans, motors, etc.) and mechanical work.

**Table 2-4**  
**Maximum Natural Gas Usage by 2012**

Description	Number of Units	Usage, MMcft/day	Usage, MMcft/year
Oxidation Catalyst Requirement	30	0.0004	2.9
SCR Requirement	8	0.03	218
Electric Motor	24	-0.31	-2,469
<b>Total</b>		<b>-0.28</b>	<b>-2,248</b>

### Electricity Usage from Electric Motors

SCAQMD staff estimates that 22 two stroke engines would be replaced with electric motors. The electric motors would require approximately 234,326 MW-hours per year.

Hanover Compressed Natural Gas Company (“Hanover”) has stated that the cost impacts from additional monitoring equipment, change of catalyst, compliance and recordkeeping would be cost prohibitive. If Hanover would replace natural gas engines with electric motors an additional 55 MW-hours/year would be required. Therefore, a total of 289,552 MW-hours per year would be needed. Detailed calculations are presented in Appendix B.

### Electricity Usage from Control and Monitoring Devices

CEMS, oxidation and SCR catalysts would require additional electricity. By 2012, approximately 5,123 MW per day would be needed. Detailed calculations are presented in Appendix B.

**Table 2-5**  
**Maximum Electricity Usage by 2012**

Description	Number of Units	Usage, MW/day	Usage, MW/year
Electric Motor	22	29.3	289,552
CEMS Requirement*	320	0.35	2,837
Oxidation Catalyst Requirement	30	0.0018	14
SCR Requirement	78	0.28	2,272
<b>Total</b>		<b>30</b>	<b>294,674</b>

\* 320 engines, 86 CEMS (all engines at each facility share one CEMS)

### Electricity Impacts

According to the 2007 Draft AQMP Program EIR, 120,194 gigawatts-hours per year were available in 2002. The 295 gigawatt-hours per year required by PAR 1110.2 would be less than a percent (0.25 percent) of the available 120,194 gigawatt-hours per year. Therefore, the 295

gigawatt-hours per year would be less than significant and not considered to be wasteful use of an energy resource.

Based upon the above considerations, the proposed project is not expected to use energy in a wasteful manner, would not substantially deplete energy resources.

Based upon the preceding analysis, it is not expected that PAR 1110.2 would create any significant effects on peak and base period demands for electricity and other forms of energy since only minor construction activities (installing or replacing appliances, or rendering appliances inoperable) are anticipated as a result of facilities complying PAR 1110.2.

Therefore, PAR 1110.2 is not expected to significantly affect peak and base period demands for electricity and other forms of energy.

Therefore, PAR 1110.2 is may significantly adversely impact energy conservation plans, affect renewable resources result in the need for new or substantially altered power or natural gas systems and supplies and will be discussed in the Draft EA. If significant impacts are found, mitigation measures will also be analyzed in the Draft EA.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>VII. GEOLOGY AND SOILS.</b> Would the project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, and compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

### Discussion

PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

**VII.a)** Southern California is an area of known seismic activity. Structures must be designed to comply with the Uniform Building Code Zone 4 requirements if they are located in a seismically active area. The local city or county is responsible for assuring that a proposed project complies with the Uniform Building Code as part of the issuance of the building permits and can conduct inspections to ensure compliance. The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. The goal of the code is to provide structures that will: (1) resist minor earthquakes without damage; (2) resist moderate



earthquakes without structural damage but with some non-structural damage; and (3) resist major earthquakes without collapse but with some structural and non-structural damage.

The Uniform Building Code bases seismic design on minimum lateral seismic forces (“ground shaking”). The Uniform Building Code requirements operate on the principle that providing appropriate foundations, among other aspects, helps to protect buildings from failure during earthquakes. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represent the foundation conditions at the site.

Accordingly, buildings and equipment at existing affected facilities are required to conform to the Uniform Building Code and all other applicable state and local codes in effect at the time they were constructed. PAR 1110.2 would require compliant ICE systems (ICEs, control technology and monitoring equipment). As already noted PAR 1110.2 does not require or promote construction of commercial or industrial land use projects. It is expected that new, retrofitted and replacement ICE systems would be installed according to all applicable state and local codes. As a result, substantial exposure of people or structure to the risk of loss, injury, or death involving seismic-related activities is not anticipated as a result of installing compliant appliances and will not be further analyzed in the Draft EA.

**VII.b)** PAR 1110.2 would require new, retrofitted and replacement ICE systems. Operators at affected industrial and commercial facilities may retrofit or replace existing ICE systems or add new equipment. It is expected that new, retrofit or replacement equipment are pre-manufactured and dropped in place within existing paved areas at the existing commercial and industrial facilities.

PAR 1110.2 would not require new development. PAR 1110.2 would only affect gaseous- and liquid-fueled ICE systems. There would be no difference in impact to soils from installing a non-compliant versus compliant ICE systems, as new development in the district would continue to be subject to Rule 403-Fugitive Dust. Compliance with Rule 403 would minimize loss of top soil during construction. ICE systems would be built upon concrete foundations which would minimize soil loss.

Installing compliant systems in existing commercial and industrial operation does not require heavy construction that would disturb soil as compliant systems are expected to be pre-manufactured, drop in units. Therefore, no soil disruption from excavation, grading, or filling activities; changes in topography or surface relief features; erosion of beach sand; or changes in existing siltation rates are anticipated from the implementation of PAR 1110.2.

**VII.c) & d)** Since PAR 1110.2 would primarily affect existing commercial and industrial facilities, it is expected that the soil types present at the affected facilities would not be further susceptible to expansive soils or liquefaction. Furthermore, subsidence is not anticipated to be a problem since no excavation, grading, or filling activities would occur at existing affected facilities because of PAR 1110.2.

PAR 1110.2 would not require or promote new development. At new facilities, the installation of PAR 1110.2 compliant ICE systems would be the similar to installing ICE systems that are compliant with the existing Rule 1110.2. Therefore, installing PAR 1110.2 compliant ICE

systems in at new facilities would not generate any additional impacts. Further, the proposed project does not involve drilling or removal of underground products (e.g., water, crude oil, et cetera) that could produce subsidence effects. Additionally, compliant systems installed in new development have no effect on the potential for landslides, lateral spreading subsidence, etc. The new development, not compliance with PAR 1110.2, would be required to undergo a CEQA analysis, which will evaluate potential geological or soil impacts.

Therefore, PAR 1110.2 would not significantly impact soils.

**VII.e)** The proposed project does not require or involve the installation of septic tanks or alternative wastewater disposal systems. Therefore, no impacts from failures of septic systems related to soils incapable of supporting such systems are anticipated.

Based on the above discussion, the proposed project is not expected to have an adverse impact on geology or soils. Since no significant adverse impacts are anticipated, this environmental topic will not be further analyzed in the draft EA. No mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, use, disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Significantly increased fire hazard in areas with flammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance. The primary effects of the proposed amendments with respect to hazards and hazardous materials are the anticipated overall increase in the amount of ammonia injected into SCR units for controlling NO<sub>x</sub> emissions from gaseous- and liquid-ICE, the increase of ammonia slip emissions, and the increase of spent catalyst.

Ammonia is the primary hazardous chemical identified with the proposed project. Ammonia, though not a carcinogen, can have chronic and acute health impacts. Therefore, an increase in the use of ammonia in response to the proposed project may increase the current existing risk setting associated with deliveries (i.e., truck and road accidents) and onsite or offsite spills for each of the facilities that currently use or will begin to use ammonia. Exposure to a toxic gas cloud is the potential hazard associated with this type of control equipment.

To minimize hazards associated with ammonia in control systems, the Executive Officer has prohibited the permitting of control technology using anhydrous ammonia. To further minimize the hazards associated with ammonia used in the SCR process, aqueous ammonia, 19 percent by weight, is typically required as a permit condition associated with the installation of SCR equipment for the following reasons: 1) 19 percent aqueous ammonia does not travel as a dense gas like anhydrous ammonia; and, 2) 19 percent aqueous ammonia is not on any acutely hazardous material lists unlike anhydrous ammonia or aqueous ammonia at higher percentages.

### **Checklist Response Explanation**

**8. a), b) and c)** The proposed project includes the installation of new SCRs and aqueous ammonia storage tanks. The 2004 Final EA for Regulation XX - RECLAIM evaluated the hazards associated with the use, storage, and transport of aqueous ammonia and concluded that no significant impacts were expected, largely due to the requirement to use 19 percent ammonia (which minimizes the impacts of using higher concentrations of ammonia) (SCAQMD, 2004).

### **Hazards Due to Transport**

The 2004 Final EA for Regulation XX - RECLAIM evaluated specific hazards due to transport of aqueous ammonia to several local refineries. It was determined that in the unlikely event that a tanker truck would rupture and release the entire 7,000 gallon capacity of aqueous ammonia, the ammonia solution would have to pool and spread out over a flat surface in order to create sufficient evaporation to produce a significant vapor cloud. For a road accident, the roads are usually graded and channeled to prevent water accumulation and a spill would be channeled to a low spot or drainage system, which would limit the surface area of the spill and the subsequent evaporative emissions. Additionally, the roadside surfaces may not be paved and may absorb some of the spill. In a typical release scenario, because of the characteristics of most roadways, the pooling effect on an impervious surface would not typically occur. As a result, the spilled ammonia would not be expected to evaporate into a toxic cloud at concentrations that could significantly adversely affect residences or other sensitive receptors in the area of the spill (SCAQMD, 2004).

Based on the low probability of an ammonia tanker truck accident with a major release and the potential for exposure to low concentrations, if any, the conclusion of the hazard analysis in the 2004 Final EA was that potential impacts due to accidental release of aqueous ammonia during transportation are less than significant.

It should be noted that this analysis is based on tanker trucks transporting aqueous ammonia in concentrations less than 19 percent by volume, which is consistent with the RECLAIM program. In the 2004 EA, models using aqueous ammonia concentrations of 29.5 percent by volume showed potentially significant hazard impacts, but since Regulation XX will require concentrations of less than 19 percent by volume, consequences of an accidental release during

transportation would be less than significant. The permit process would require the transport of aqueous ammonia at concentrations less than 19 percent so the transportation hazards are expected to be less than significant.

### **Hazards Due to Rupture**

Emergency Response Planning Guideline (ERPG) 2 (150 ppm) is the lowest ammonia concentration of interest analyzed in the Draft EA. ERPG-2 concentrations are the maximum airborne concentration below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair their ability to take protective action. The offsite consequence analysis will also provide the distance to the ERPG-3 concentration (750 ppm). ERPG-3 is the maximum concentration below which nearly all individuals could be exposed for one hour without experiencing or developing life threatening health effects. ERPG-3 concentrations are the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to one hour without experiencing or developing life-threatening health effects. “Worst-case” atmospheric conditions (e.g., low winds and stable air) will be used to evaluate whether accidental release concentrations exceed the ERPG-2 and ERPG-3 levels.

SCAQMD staff estimates that the largest ammonia tank installed to comply with PAR 1110.2 would be 5,000 gallons. Storage tanks constructed at affected facilities would be surrounded by secondary containment designs (e.g., dykes, berms, etc.). These same containment facilities would be provided at truck loading racks to contain ammonia in the event of a spill during transfer activities.

The worst-case release scenario would be a catastrophic storage tank failure. The rupture of an ammonia storage tank would release the ammonia into the secondary containment area. Ammonia would then vaporize from the liquid pool in the secondary containment area. Adverse impacts from a catastrophic storage tank failure will be analyzed in the Draft EA.

Affected sites located within one-quarter mile of an existing school site will be disclosed in the Draft EA.

**8. d)** Adverse impacts to affected hazardous materials sites as defined in Government Code §65962.5 will be estimated and evaluated in the Draft EA.

**8. e) and f)** Adverse impacts from facilities that use SCR and are located within an airport land use plan or within two miles of a public or private use airport will be evaluated in the Draft EA

**8. g)** The proposed project modifications are located within the existing operating portions of affected facilities. The proposed projects are not expected to alter the routes employees would take to evacuate the site, as the evacuation routes generally direct employees to locations outside of the main operating portions of the facilities. The existing emergency response plan is not expected to require modifications due to the proposed projects. No significant adverse impacts to emergency response or evacuation plans are expected.

**8. h)** Since existing ICE systems are operating the proposed project would not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. SCAQMD staff does not expect facilities to alter the type or amount of fuel used when replacing or retrofitting

engines. None of the control technologies or monitoring equipment is expected to use flammable materials. In addition, the proposed projects are located in urbanized, industrial areas and no wildlands are expected to be located in the immediate or surrounding areas. Also, no substantial or native vegetation is expected to exist within the operational portions of any of the affected facilities, since existing ICE systems are operating at these facilities. For these reasons, the proposed projects would not expose people or structures to wildland fires. Therefore, no potential significant adverse impacts resulting from wildland fire hazards are expected from the proposed projects.

**8. i)** None of the control technologies or monitoring equipment is expected to use flammable materials (aqueous ammonia is not flammable). PAR 1110.2 would not require a change in operation, fuels consumed or stored; therefore, the proposed projects will not increase the potential for fire hazards at the affected facilities.

**Conclusion**

Ammonia is the only hazardous material associated with PAR 1110.2 that was identified. The effects of an accidental release of ammonia during transported from the proposed projects were not determined to be significant. The effects of an accidental release of ammonia from a catastrophic storage tank failure will be analyzed in the Draft EA. The location of ammonia storage tanks proposed near schools, hazardous material sites, and airport and airstrips will be disclosed in the Draft EA.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>IX. HYDROLOGY AND WATER QUALITY.</b>			
Would the project:			
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- |    |   |                          |                          |                                     |
|----|---|--------------------------|--------------------------|-------------------------------------|
| m) | Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| n) | Require in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### Significance Criteria

Potential impacts on water resources will be considered significant if any of the following criteria apply:

#### Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

#### Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use a substantial amount of potable water.
- The project increases demand for water by more than five million gallons per day.

### Discussion

PAR 1110.2 would reduce NO<sub>x</sub>, VOCs and CO from gaseous- and liquid-fueled ICE. Compliance includes retrofit or replacement of equipment to achieve BACT emission levels and improving monitoring, recordkeeping and reporting for better compliance.

**IX.a), e), f), j), k), & l)** PAR 1110.2 would require the replacement or retrofit of ICE systems. PAR 1110.2 has no provision that would require the use of water or the disposal of wastewater, because compliant ICEs do not use water for any reason. Therefore, PAR 1110.2 would not cause the construction of additional water resource facilities, the need for new or expanded water entitlements, or an alteration of drainage patterns. Since it does not require water, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.



ICE systems do not generate wastewater and, therefore, would not create or contribute to runoff water. ICE systems are housed within structures that would protect them from exposure to and contaminating stormwater. ICE systems that are used outdoors are typically protected from weather, especially rain and would not be expected to contaminate stormwater in any way. Since both compliant and non-compliant ICE systems are typically enclosed systems, ICE systems are not expected to contaminate rainwater. Therefore, PAR 1110.2 would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

In addition, the proposed rule is not expected to require additional wastewater disposal capacity, violate any water quality standard or wastewater discharge requirements, or otherwise substantially degrade water quality.

**IX.b), & n)** PAR 1110.2 is not expected to substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. PAR 1110.2 would not increase demand for water from existing entitlements and resources, and will not require new or expanded entitlements because compliant devices do not use water for any reason. Therefore, no water demand impacts are expected as the result of implementing the proposed amendments.

**IX.c) & d)** PAR 1110.2 may include minor construction activities to retrofit or replace ICE systems within new or existing affected facilities, installation of replacement or retrofit equipment is not expected to require earthmoving or excavation so not soil disturbance would occur as a results of implementing PAR 1110.2. As result, no changes to storm water runoff, drainage patterns, groundwater characteristics, or flow are expected. Therefore, potential adverse impacts to drainage patterns, etc., are not expected as a result of implementing PAR 1110.2.

**IX.g), h) & i)** The project will not require or induce construction of new housing or contribute to the construction of new building structures other than retrofit or replacement of equipment within existing affected facilities. PAR 1110.2 may affect ICE systems at new facilities, but would not require any new facilities. Therefore, PAR 1110.2 is not expected to generate construction of any new structures in 100-year flood areas as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood delineation map. As a result, PAR 1110.2 is not expected to expose people or structures to new significant flooding risks. Modification of existing systems in existing affected facilities would not affect any existing risks from flood, inundation, etc. Consequently, PAR 1110.2 would not affect in any way any potential flood hazards inundation by seiche, tsunami, or mud flow that may already exist relative to existing facilities.

**IX.m)** PAR 1110.2 will not demand for water supplies, since only minor construction activities (retrofit or replacement of existing equipment) are expected to occur within affected facilities. Similarly, compliant appliances do not use water for any purpose; therefore, no storm water discharge supply facilities or modifications to existing facilities would be required due to the implementation of PAR 1110.2. Accordingly, PAR 1110.2 is not expected to generate significant adverse impacts relative to construction of new storm water drainage facilities.

Based upon the above considerations, significant hydrology and water quality impacts are not expected from the implementation of PAR 1110.2 and will not be further analyzed in the Draft EA.

Since no significant hydrology and water quality impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>X. LAND USE AND PLANNING.</b> Would the project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

**Discussion**

**X.a)** The proposed project would require retrofit or replacement of existing ICE systems and installation of compliant systems at new affected facilities. PAR 1110.2 does not require any new development, but would require installation of compliant systems installed in new development. At existing facilities, PAR 1110.2 would impact the operation. PAR 1110.2 does not include any components that would require physically dividing an established community.

**X.b) & c)** There are no provisions in PAR 1110.2 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by regulating NOx, VOC and CO emissions from ICE systems. Therefore, PAR 1110.2 would not affect in any way habitat conservation or natural community conservation plans, agricultural resources or operations, and would not create divisions in any existing communities. Therefore, present or planned land uses in the region will not be significantly adversely affected as a result of the proposed rule.

Based upon these considerations, significant land use and planning impacts are not expected from the implementation of PAR 1110.2 and will not be further analyzed in the Draft EA. Since

no significant land use and planning impacts were identified, no mitigation measures are necessary or required.



	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XI. MINERAL RESOURCES.</b> Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

**Discussion**

**XI.a) & b)** There are no provisions in PAR 1110.2 that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan because compliant appliances typically do not require mineral resources such as sand, gravel, etc..

Based upon the above considerations, significant mineral resources impacts are not expected from the implementation of PAR 1110.2 and will not be further analyzed in the Draft EA. Since no significant mineral resources impacts were identified, no mitigation measures are necessary or required.



	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>XII. NOISE.</b> Would the project result in:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airship, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts on noise will be considered significant if:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

**Discussion**

**XII.a)** PAR 1110.2 would require retrofit and replacement of ICE systems in existing and installation of compliant ICE systems in new affected facilities. Since installation or replacement of ICEs is expected to be comprised of pre-fabricated equipment that would not require much heavy duty construction equipment, noise impacts during replacement would be minimal. Most facilities are not expected to need heavy construction equipment. Large ICE systems may require a crane or lift to install replacement ICE and control equipment or retrofit equipment. However, facilities that use large ICEs, typically have diesel truck, industrial equipment and/or on-site mobile equipment that generate comparable noise. Therefore, the operation of an additional crane or lift is not expected to be significant. The retrofit or replacement systems are not expected to generate more noise than existing systems. New ICE systems at new facilities are not expected to be louder than currently compliant systems that would be required if PAR 1110.2 is not adopted. In addition, building codes typically include setbacks for ICE systems from the property line, noise from these systems indoors and outdoors are expected to be limited to acceptable levels by the building permit process. Thus, the proposed project is not expected to expose persons to the generation of excessive noise levels above current facility levels. It is expected that any facility affected by PAR 1110.2 would comply with all existing local noise control laws or ordinances.

In commercial environments Occupational Safety and Health Administration (OSHA) and California-OSHA have established noise standards to protect worker health. It is expected that operators at affected facilities would continue complying with applicable noise standards, which would limit noise impacts to workers, patrons and neighbors.

**XII.b)** PAR 1110.2 is not anticipated to expose people to or generate excessive groundborne vibration or groundborne noise levels since only minor construction activities are expected to occur at the existing facilities and compliant equipment are not expected to involve, in any way, equipment that generates vibrations over existing equipment.

**XII.c)** A permanent increase in ambient noise levels at the affected facilities above existing levels as a result of implementing the proposed project is unlikely to occur because for most affected facilities similar equipment would be installed as part of implementing PAR 1110.2. The existing noise levels are unlikely to change and raise ambient noise levels in the vicinities of the existing facilities to above a level of significance, because neither non-compliant nor compliant ICEs are expected to generate comparable levels of noise.

**XII.d)** No increase in periodic or temporary ambient noise levels in the vicinity of affected facilities above levels existing prior to PAR 1110.2 is anticipated because the proposed project would require only minor construction (installation or replacement of ICE systems) activities that would not require heavy equipment besides cranes or lifts. As indicated earlier, operational noise levels are expected to be equivalent to existing noise levels.

**XII.e) & f)** Implementation of PAR 1110.2 would generally consist of improvements within the existing facilities. Minor construction may be required to install or replace appliances. Even if an affected facility is located near a public/private airport, there are no new noise impacts expected from any of the existing facilities, either during construction or operation, as a result of complying with the proposed project. Thus, PAR 1110.2 is not expected to expose people residing or working in the vicinities of public airports to excessive noise levels.

Based upon these considerations, significant noise impacts are not expected from the implementation of PAR 1110.2 and are not further evaluated in the Draft EA. Since no significant noise impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XIII. POPULATION AND HOUSING.</b> Would the project:			
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

**Discussion**

**XIII.a)** The proposed project is not anticipated to generate any significant effects, either direct or indirect, on the district's population or population distribution as no additional workers are anticipated to be required to comply with the proposed amendments. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing PAR 1110.2. It is expected that any construction activities at affected facilities would use construction workers from the local labor pool in southern California. As such, PAR 1110.2 will not result in changes in population densities or induce significant growth in population.

**XIII.b) & c)** Because the proposed project affects ICE systems at commercial and industrial facilities, PAR 1110.2 is not expected to result in the creation of any industry that would affect

population growth, directly or indirectly, induce the construction of single- or multiple-family units, or require the displacement of people elsewhere.

Based upon these considerations, significant population and housing impacts are not expected from the implementation of PAR 1110.2 and are not further evaluated in the Draft EA. Since no significant population and housing impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XIV. PUBLIC SERVICES.</b> Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:			
a) Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

**Discussion**

**XIV.a) & b)** The replacement or modification of ICE systems is not expected to increase the chances for fires or explosions requiring a response from local fire departments. As shown in the Section VIII - Hazards and Hazardous Material section of the Draft EA, the use of compliant ICE systems is not expected to generate significant explosion or fire hazard impacts.

The Association of California Water Agencies (ACWA) has implied that PAR 1110.2 would require the removal of natural gas engines that would hinder the ability of water agencies to supply water to fight fires. PAR 1110.2 would not require water agencies to remove natural gas engines. PAR 1110.2 may require additional or retrofit monitoring, control equipment, and

recordkeeping. The additional retrofit monitoring, control equipment and recordkeeping is not expected to hinder the delivery of water to fire fighters. Therefore, PAR 1110.2 is not expected to have a significant impact on fire fighters.

In addition, SCAQMD staff has reviewed a list of public water agencies that are members of the ACWA. Some of the largest public water agencies Los Angeles Department of Water and Power (LA DWP), Metropolitan Water District (MWD) of Southern California, MWD of Orange County, and Orange County Water District do not have natural gas engines. There are several public water agencies located in areas susceptible to wildfires that do not have natural gas engines: Elsinore Valley MWD, Idywild Water District (WD), Lake Hemet MWD, etc. Since there are large water districts and water districts in areas susceptible to wildfires that are able to support fire fighters without natural gas engines, it is expected that facilities that have natural gas engines would comply with PAR 1110.2 or develop means used by water districts that do not use natural gas engines to fight wild fires. Therefore, it is not expected that PAR 1110.2 would significantly affect wildfire fighting efforts.

PAR 1110.2 is not expected to have any adverse effects on local police departments for the following reasons. Police would be required to respond to accidental releases of hazardous materials during transport. Since hazards impacts from implementing PAR 1110.2 were concluded to be less than significant, potential impacts to local police departments are also expected to be less than significant.

**XIV.c) & d)** As indicated in discussion under item XIII. Population and Housing, implementing PAR 1110.2 would not induce population growth or dispersion during either construction or operation. Therefore, with no increase in local population anticipated, additional demand for new or expanded schools or parks is not anticipated. As a result, no significant adverse impacts are expected to local schools or parks.

**XIV.e)** Besides building permits, there is no other need for government services. The proposal would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. There will be no increase in population and, as a result of implementing; therefore, no need for physically altered government facilities.

Based upon these considerations, significant public services impacts are not expected from the implementation of PAR 1110.2 and are not further evaluated in the Draft EA. Since no significant public services impacts were identified, no mitigation measures are necessary or required.



	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XV. RECREATION.</b>			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

**Discussion**

**XV.a) & b)** As discussed under “Land Use and Planning” above, there are no provisions in the PAR 1110.2 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the changes proposed in PAR 1110.2. The proposed project would not increase the demand for or use of existing neighborhood and regional parks or other recreational facilities or require the construction of new or expansion of existing recreational facilities that might have an adverse physical effect on the environment because it will not directly or indirectly increase or redistribute population.

Based upon these considerations, significant recreation impacts are not expected from the implementation of PAR 1110.2 and are not further evaluated in the Draft EA. Since no significant recreation impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>XVI. SOLID/HAZARDOUS WASTE.</b> Would the project:			
a) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

The proposed project impacts on solid/hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.
- 

### Discussion

**XVI.a)** PAR 1110.2 would generate both solid and hazardous waste. PAR 1110.2 may necessitate the replacement of two-stroke ICES with electric motors. Existing ICES are not expected to be classified as hazardous waste. Therefore, the disposal of existing ICES is expected to be categorized as solid waste.

PAR 1110.2 may require the upgrade of existing catalyst, and installation of new oxidation catalyst systems and SCR systems. Metals used in catalyst are generally recovered because they are made of precious and valuable metals (e.g., platinum and palladium). Metals can be recovered from approximately 60 percent of the spent catalyst generated from the operation of catalytic oxidizers.<sup>13</sup> None of the SCR catalyst is recycled, because it does not contain precious metals. Catalyst from control technology is classified as hazardous waste. These metals could then be recycled. The remaining material would likely need to be disposed of at a hazardous waste landfill.

### Solid Waste

The Final Program Environmental Impact Report for the 2003 AQMP states that the daily landfill capacity for Los Angeles, Orange, Riverside and San Bernardino Counties is 101,344 tons per day (Table 3.5-1, page 3.5-2). In a worst-case scenario, it is estimated that as much as, 151 tons of the material from the replacement of two-stroke engines with electric motors would eventually be sent to landfill by July 1, 2007. Since cities and landfills are required to divert recyclable material to recycling center a large amount of the recyclable from the engines should get recycled. The total waste from PAR 1110.2 would be less than one percent of the total daily

<sup>13</sup> SCAQMD, 2003 Final AQMP Program EIR, 2003.

capacity. Therefore, the increase in solid waste that would be generated from the proposed project is less than significant. Detailed calculations can be found in Appendix B.

**Hazardous Waste**

Approximately 120 tons of catalyst will be installed pursuant to PAR 1110.2. Catalysts have a lifespan of approximately three years. Assuming that a third of the catalyst is replaced every year approximately 14.6 tons of catalyst will be disposed per year of and 0.7 ton per year will be recycled. Detailed calculations can be found in Appendix B.

Depending on its actual waste designation, spent catalysts would likely be disposed of in a Class II landfill or a Class III landfill that is fitted with liners. According to the Program EIR for the 2003 AQMP (SCAQMD, 2003), total Class III landfill waste disposal capacity in the district is approximately 101,340 tons per day, many of which have liners and can handle Class II and Class III wastes. The initial disposal of two tons of existing catalyst and fifteen tons per year of catalyst is less than one percent of 101,340 tons per day. Therefore disposal of catalyst is not considered significant.

**XVI.b)** Most cities have solid and hazardous waste disposal requirements. Many cities require that scrap metal be recycled. In addition, because of the value of scrap metal, contractors will recycle scrap metal. Contractors are expected to adherence to the applicable federal, state and local regulatory requirements for the disposal of solid waste.

Based on these considerations, PAR 1110.2 is not expected to significantly increase the volume of solid or hazardous wastes disposed at existing municipal or hazardous waste disposal facilities or require additional waste disposal capacity. Further, implementing PAR 1110.2 is not expected to interfere with any affected facility’s ability to comply with applicable local, state, or federal waste disposal regulations. Since no solid/hazardous waste impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XVII. TRANSPORTATION/TRAFFIC.</b> Would the project:			
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access or?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts on transportation/traffic will be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day
- Increase customer traffic by more than 700 visits per day.

### Discussion

**XVII.a) & b)** PAR 1110.2 has a variety of requirements that with compliance dates from 2007 to 2012. Most of the construction would occur within the first two years. Based on a survey of

facilities with gaseous- and liquid-fuel engines, SCAQMD staff estimates that 435 engines would require source test in 2007; 528 engine systems would require minor construction to install infrastructure (sampling ports, platforms, safe access and utilities) and air/fuel ratio controllers by June 2008; 742 engines require installation of CO analyzers and/or NO<sub>x</sub>-CO CEMS by July 2008; 517 engines would need replacement with electric motors by July 1, 2010; 298 engines would need oxidation catalyst or modification of oxidation catalyst by July 2011; and 154 facilities would need oxidation catalyst, modification of oxidation catalyst or SCR. Construction or modification of control technologies, engine replacement with electric motor or installation of infrastructure may require cranes, loaders, forklifts, welders and generator sets. Installation of controllers, analyzers, and CEMS systems are likely to require less heavy equipment. All construction would require delivery truck and worker trips. Based on the above, SCAQMD staff assumes that construction would occur at approximately 15 facilities per day beginning in 2007 through 2008. Between 2009 to 2012, construction would occur at one or two facilities per day. Based on construction at 15 facilities per day, approximately 50 delivery or haul truck trips and 75 worker trips would be required. Since these construction work trips would be spread through the district, these additional construction work trips would not impact transportation or traffic significantly.

During operation, one ammonia delivery per quarter may be required for 76 SCR systems. One trip would be required at each facility every six years for additional source testing. One trip would be required every three years at 11 facilities to replace oxidation catalyst. These additional operational diesel truck trips would not impact transportation or traffic significantly.

**XVII.c)** PAR 1110.2 would require the replacement or retrofit of existing ICE systems and the installation of compliant ICE systems at new facilities. The stack heights for compliant ICE systems are not expected to be significantly higher than existing systems. Building codes should prevent stacks from adversely affect air traffic patterns. Further, PAR 1110.2 would not affect in any way air traffic in the region because ICE systems or components are not expected to be transported by plane to any appreciable extent.

**XVII.d)** Since PAR 1110.2 affects ICE systems, no offsite modifications to roadways are anticipated for the proposed project that would result in an additional design hazard or incompatible uses.

**XVII.e)** Since PAR 1110.2 affects ICE systems, no changes are expected to emergency access at or in the vicinity of the affected facilities. The proposed project is not expected to adversely impact emergency access because it primarily requires replacement of non-compliant appliances with compliant appliances.

**XVII.f)** Since PAR 1110.2 affects ICE systems, no changes are expected to the parking capacity at or in the vicinity of the affected facilities. PAR 1110.2 is not expected to require additional workers, so additional parking capacity will not be required. Therefore, the project is not expected to adversely impact on- or off-site parking capacity.

**XVII.g)** Since PAR 1110.2 affects ICE systems, the implementation of PAR 1110.2 would not result in conflicts with alternative transportation, such as bus turnouts, bicycle racks, et cetera.

Based upon these considerations, PAR 1110.2 is not expected to generate significant adverse transportation/traffic impacts and, therefore, this topic will not be considered further. Since no significant transportation/traffic impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.</b>			
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**XVIII.a)** As discussed in the “Biological Resources” section, PAR 1110.2 is not expected to significantly adversely affect plant or animal species or the habitat on which they rely because PAR 1110.2 is expected to affect equipment or processes located at existing commercial or industrial facilities, which are typically areas that have already been greatly disturbed and that currently do not support such habitats. Additionally, PAR 1110.2 does not require or induce construction of any new land use projects that could affect biological resources. Construction of new land use projects would be done for reasons unrelated to PAR 1110.2.

**XVIII.b)** Based on the foregoing analyses, since PAR 1110.2 may generate any project-specific adverse significant environmental impacts for air quality, energy and hazards and hazardous materials. If significant adverse project-specific impacts are generated by PAR 1110.2, the project is expected to be cumulatively significant for those environmental topics. If PAR 1110.2

is not determined to be significant for adverse project-specific impacts, then it is not expected to cause cumulative impacts in conjunction with other projects that may occur concurrently with or subsequent to the proposed project. Related projects to the currently proposed project include existing and proposed rules and regulations, as well as AQMP control measures. The environmental topics checked 'No Impact' (e.g., aesthetics, agriculture resources, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, and transportation and traffic) would not be expected to make any contribution to potential cumulative impacts whatsoever. For the environmental topic checked 'Less than Significant Impact' (e.g., solid/hazardous waste), the analysis indicated that project impacts would not exceed any project-specific significance thresholds. This conclusion is based on the fact that the analyses for each of these environmental areas concluded that the incremental effects of the proposed project would be minor and, therefore, not considered to be cumulatively considerable.

**XVIII.c)** Based on the foregoing analyses, PAR 1110.2 may cause significant adverse effects on human beings. The Draft EA will analyze air quality, energy and hazards and hazardous material impacts expected from the implementation of PAR 1110.2. Based on the preceding analyses, no significant adverse impacts to aesthetics, agriculture resources, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid/hazardous waste and transportation and traffic are expected as a result of the implementation of PAR 1110.2.

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**APPENDIX A (OF THE INITIAL STUDY)**

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**PROPOSED RULE 1110.2**



In order to save space and avoid repetition, please refer to the latest version of proposed amended Rule 1110.2 located elsewhere in Appendix B of the Draft EA. The April 24 2007 version of the proposed amended rule was circulated with the Notice of Preparation/Initial Study (NOP/IS) that was released on April 26, 2007 for a 30-day public review and comment period ending May 25, 2007.

Hard copies of this NOP/IS, which include the version “PAR 1110.2 (April 24 2007)” of the proposed amended rule, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039

## **APPENDIX B (OF THE INITIAL STUDY)**

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### **ASSUMPTIONS AND CALCULATIONS**

**Table B-1**  
**PAR 1110.2 Emission Calculations - Summary (tons per day)**

Description	Emissions			Emission Reductions		
	NO <sub>x</sub> , ton/day	CO, ton/day	VOC, ton/ year	NO <sub>x</sub> , ton/day	CO, ton/day	VOC, ton/day
Calculated Baseline	3.00	10.91	1.25			
Estimated Actual Baseline (Including Excess Emiss.)	4.26	52.98	8.64			
Calculated Emissions beginning 6/1/2007	4.20	52.67	8.62	0.06	0.31	0.03
Calculated Emissions as of 7/1/2008	2.92	10.76	1.24	1.28	41.91	7.37
Calculated Emissions beginning 7/1/2010	2.68	8.60	1.00	0.24	2.17	0.24
Calculated Emissions beginning 7/1/2011	2.46	7.66	0.98	0.21	0.94	0.02
Calculated Emissions beginning 7/1/2012	1.35	3.81	0.86	1.12	3.85	0.12
<b>Totals</b>				2.91	49.17	7.78

Calculated emissions are based on reported fuel use. NO<sub>x</sub> emissions are based on the NO<sub>x</sub> limit of each engine or the reported NO<sub>x</sub> for RECLAIM major sources or if the AER-reported NO<sub>x</sub> exceeds the calculated NO<sub>x</sub> based on the NO<sub>x</sub> limit. CO and VOC emissions are based on the CO and VOC limits for BACT engines. For non-BACT engines, CO and VOC emissions are based on the averaged source test results for the engine or on the average source test results for the category (if there are no source test data for that engine). Emissions are scaled up by a 1/0.696 factor to account for a 69.6% survey response rate.

Excess emissions are based on the results of AQMD unannounced tests, which showed the following results, on average, in terms of the ratio (R) of the measured pollutant concentration to the concentration limit (L):

Rich-burn engines without CEMS:

$$R\text{-NO}_x = 2.12 \times (45.85 / L\text{-NO}_x)^{0.647}$$

Rich-burn engines with CEMS:

$$R\text{-CO} = 0.7 \times (2000 / L\text{-CO})^{0.692}$$

$$R\text{-NO}_x = 0.115$$

$$R\text{-CO} = 3.65 \times (2000 / L\text{-CO})^{0.692}$$

Lean-Burn non-biogas BACT engines w/o CEMS:

$$R\text{-NO}_x = 1.81$$

$$R\text{-CO} = 0.33$$

In all cases, it is assumed that R-VOC = R-CO

For the one RECLAIM-major, BACT, rich-burn engine, the excess-emission formula is not applied since the reported NO<sub>x</sub> emission is close to the BACT NO<sub>x</sub> limit, suggesting that the engine is not being operated at excessively low NO<sub>x</sub> as has been observed on average for other rich-burn engines with CEMS.

For RECLAIM-non-major, non-BACT, rich-burn engines, the excess NO<sub>x</sub> emission formula is not applied if the NO<sub>x</sub> limit exceeds 100 ppm at 15% O<sub>2</sub> since this is considered too far beyond the range of the data upon which the formula is based. In those cases, the excess NO<sub>x</sub> emission is assumed to be zero.

Emission reductions beginning 6/1/2007 reflect the elimination of elevated emission limits based on efficiency for non-biogas engines and restriction of non-biogas fuel use in biogas engines that are using the elevated emission limits. The biogas/non-biogas portions of these reductions are as follows: NO<sub>x</sub>- 0.048 /0.024, CO- 0.207/0.160, VOC- 0.019/0.018.

Further reductions beginning 7/1/2008 reflect the effects of increased CEMS monitoring, addition of CEMS CO monitoring, and initiation of inspection and monitoring programs for non-CEMS engines--all of which, combined, are expected to eliminate the excess emissions by 7/1/2008.

Further reductions beginning 7/1/2010 are the result of reducing emission limits on non-biogas engines that are 500 bhp and larger to current non-biogas BACT levels (11 ppm NO<sub>x</sub>, 70 ppm CO and 30 ppm VOC, all at 15% O<sub>2</sub>).

Further reductions beginning 7/1/2011 are the result of reducing emission limits on non-biogas engines smaller than 500 bhp to current non-biogas BACT levels.

Further reductions beginning 7/1/2012 are the result of reducing emission limits on biogas engines to current non-biogas BACT levels.

**Table B-2**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
<b>Biogas, BACT, =&gt;1000</b>															
025070	394362	4261	Generator			SCR	0	0	0	0	58.2	58.2	0	0	0
025070	394363	4261	Generator			SCR	0	0	0	0	58.2	58.2	0	0	0
025070	394364	4261	Generator			SCR	0	0	0	0	58.2	58.2	0	0	0
9163	323773	1988	Generator			SCR	0	0	0	0	27.2	27.2	0	0	0
9163	323774	1988	Generator			SCR	0	0	0	0	27.2	27.2	0	0	0
113674	430422	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
113674	430424	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
113674	430726	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
50310	437561	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
50310	437562	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
50310	437563	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
50310	437564	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
50310	437565	1877	Generator			SCR	0	0	0	0	25.6	25.6	0	0	0
6979	438643	1777	Generator			SCR	0	0	0	0	24.3	24.3	0	0	0
140846	430412	1468	Generator			SCR	0	0	0	0	20.1	20.1	0	0	0
74413	390032	1350	Generator			SCR	0	0	0	0	18.4	18.4	0	0	0
<b>Biogas, BACT, &lt;1000</b>															
013088	414294	400	Compressor			SCR	20	0	0	0	0.0	20.1	0	0	26
<b>Biogas, Non-BACT, =&gt;1000</b>															
104806	323139	4235	Generator			SCR	0	0	0	0	57.9	57.9	0	0	0
104806	323140	4235	Generator			SCR	0	0	0	0	57.9	57.9	0	0	0
29110	414653	4166	Generator			SCR	0	0	0	0	56.9	56.9	0	0	0
29110	414654	4166	Generator			SCR	0	0	0	0	56.9	56.9	0	0	0
29110	414655	4166	Generator			SCR	0	0	0	0	56.9	56.9	0	0	0
29110	414656	4166	Generator			SCR	0	0	0	0	56.9	56.9	0	0	0
29110	414657	4166	Generator			SCR	0	0	0	0	56.9	56.9	0	0	0
17301	414648	3471	Generator			SCR	0	0	0	0	47.4	47.4	0	0	0
17301	414650	3471	Generator			SCR	0	0	0	0	47.4	47.4	0	0	0
17301	414651	3471	Generator			SCR	0	0	0	0	47.4	47.4	0	0	0
113518	414941	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
113518	414942	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
113518	414943	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
142408	437742	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
142408	437743	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
142408	437744	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
142408	437745	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
142408	437746	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
142417	437754	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
142417	437755	2650	Generator			SCR	0	0	0	0	36.2	36.2	0	0	0
9961	301547	1599	Generator			SCR	0	0	0	0	21.8	21.8	0	0	0
9961	301548	1599	Generator			SCR	0	0	0	0	21.8	21.8	0	0	0
9961	301549	1599	Generator			SCR	0	0	0	0	21.8	21.8	0	0	0
135216	411148	1408	Generator			SCR	0	0	0	0	19.2	19.2	0	0	0
135216	411147	1158	Generator			SCR	0	0	0	0	15.8	15.8	0	0	0
<b>Biogas, Non-BACT &lt;1000</b>															
9163	433835	920	Generator			SCR	20	0	0	0	12.6	32.7	0	0	0
1179	438072	911	Generator			SCR	0	0	0	0	12.4	12.4	0	0	0
11301	160410	750	Generator			SCR	20	0	0	0	10.2	30.4	0	0	0
11301	160411	750	Generator			SCR	0	0	0	0	10.2	10.2	0	0	0
022674	351750	705	Generator			SCR	0	0	0	0	9.6	9.6	0	0	0
13433	319394	580	Generator			SCR	20	0	0	0	7.9	28.1	0	0	0
13433	319395	580	Generator			SCR	0	0	0	0	7.9	7.9	0	0	0
13433	319396	580	Generator			SCR	0	0	0	0	7.9	7.9	0	0	0
3866	172772	636	Compressor			SCR	0	0	0	0	0	0	0	0	41
001703	373739	530	Compressor			SCR	20	0	0	0	0	20.1	0	0	34
001703	373740	530	Compressor			SCR	0	0	0	0	0	0	0	0	34
019159	416944	260	Compressor			SCR	20	0	0	0	0	20.1	0	0	17
<b>Non-Biogas, RECLAIM, BACT, Rich, Major</b>															
68118	436966	2000	Pump				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, RECLAIM, BACT, Rich, Non-Major</b>															
800128	367656	818	Generator				20	0	0	0	0	20.1	0	0	0
800128	367657	818	Generator				0	0	0	0	0	0	0	0	0
800128	367658	818	Generator				0	0	0	0	0	0	0	0	0
800128	367659	818	Generator				0	0	0	0	0	0	0	0	0
18455	406950	600	Generator				20	0	0	0	0	20.1	0	0	0
18455	406951	564	Generator				0	0	0	0	0	0	0	0	0
18455	406952	564	Generator				0	0	0	0	0	0	0	0	0
141012	432686	790	Compressor				20	0	0	0	0	20.1	0	0	0
141012	432687	790	Compressor				0	0	0	0	0	0	0	0	0
800127	274839	750	Compressor				20	0	0	0	0	20.1	0	0	0
346	335791	545	Compressor				0	0	0	0	0	0	0	0	0
100844	425811	412	Compressor				0	0	0	0	0	0	0	0	0
6714	408065	283	Pump				0	0	0	0	0	0	0	0	0
6714	408067	283	Pump				0	0	0	0	0	0	0	0	0
6714	408064	116	Pump				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
6714	408068	116	Pump				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Rich, Major</b>															
130211	414383	2068	Generator Upgrade				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Rich, Non-Major</b>															
98159	332851	870	Generator Upgrade				0	0	0	0	0	0	0	0	0
5973	362357	818	Generator Upgrade				20	0	0	0	0	20.1	0	0	0
5973	362358	818	Generator Upgrade				0	0	0	0	0	0	0	0	0
5973	362359	818	Generator Upgrade				0	0	0	0	0	0	0	0	0
54547	171158	125	Generator Upgrade				0	0	0	0	0	0	0	0	0
5973	101703	738	Compressor Upgrade				0	0	0	0	0	0	0	0	0
5973	101704	738	Compressor Upgrade				0	0	0	0	0	0	0	0	0
75531	319404	250	Compressor Upgrade				0	0	0	0	0	0	0	0	0
75531	319405	250	Compressor Upgrade				0	0	0	0	0	0	0	0	0
11034	190074	132	Compressor Upgrade				20	0	0	0	0	20.1	0	0	0
11034	190075	132	Compressor Upgrade				0	0	0	0	0	0	0	0	0
11034	190076	132	Compressor Upgrade				0	0	0	0	0	0	0	0	0
800189	457331	708	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
800189	457332	708	Pump Upgrade				0	0	0	0	0	0	0	0	0
11034	156967	377	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
11034	156968	377	Pump Upgrade				0	0	0	0	0	0	0	0	0
9053	434478	377	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
9053	434498	377	Pump Upgrade				0	0	0	0	0	0	0	0	0
9053	434501	377	Pump Upgrade				0	0	0	0	0	0	0	0	0
11034	156966	287	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
9053	434502	244	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
9053	434503	244	Pump Upgrade				0	0	0	0	0	0	0	0	0
9053	434504	244	Pump Upgrade				0	0	0	0	0	0	0	0	0
800189	457324	218	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
800189	457335	218	Pump Upgrade				0	0	0	0	0	0	0	0	0
11034	190071	193	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
11034	190072	193	Pump Upgrade				0	0	0	0	0	0	0	0	0
11034	190073	193	Pump Upgrade				0	0	0	0	0	0	0	0	0
800189	457334	151	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
800189	457325	102	Pump Upgrade				0	0	0	0	0	0	0	0	0
800189	457326	102	Pump Upgrade				0	0	0	0	0	0	0	0	0
8582	198426	97	Pump Upgrade				20	0	0	0	0	20.1	0	0	0
8582	198427	97	Pump Upgrade				0	0	0	0	0	0	0	0	0
8582	198428	97	Pump Upgrade				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
9217	196405	86	Pump		Upgrade		0	0	0	0	0	0	0	0	0
9217	196409	86	Pump		Upgrade		0	0	0	0	0	0	0	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Lean, Major, 4-Stroke</b>															
5973	147546	5500	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
5973	156060	5500	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
5973	156061	5500	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
5973	156062	5500	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
5973	156063	5500	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
800128	153507	2000	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
800128	159101	2000	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
800128	159102	2000	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
800128	159103	2000	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
800128	159104	2000	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
9053	434505	1650	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
9053	434506	1650	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
9053	434507	1650	Compressor	Ox Cat			0	0	0	0	0	0	0	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Lean, Major, 2-Stroke</b>															
4242	170675	3000	Generator	Electric			0	17,367	0	0	0	17,367	-193	0	0
8582	368116	2000	Compressor	Electric			0	12,305	0	0	0	12,305	-129	0	0
8582	368117	2000	Compressor	Electric			0	12,305	0	0	0	12,305	-129	0	0
8582	368118	2000	Compressor	Electric			0	12,305	0	0	0	12,305	-129	0	0
4242	169829	3200	Compressor	Electric			0	19,688	0	0	0	19,688	-206	0	0
4242	172126	3000	Compressor	Electric			0	18,458	0	0	0	18,458	-193	0	0
800127	327697	1800	Compressor	Electric			0	11,075	0	0	0	11,075	-116	0	0
800127	327699	1800	Compressor	Electric			0	11,075	0	0	0	11,075	-116	0	0
8582	311760	1350	Compressor	Electric			0	8,306	0	0	0	8,306	-87	0	0
8582	311761	1350	Compressor	Electric			0	8,306	0	0	0	8,306	-87	0	0
8582	311755	1100	Compressor	Electric			0	6,768	0	0	0	6,768	-71	0	0
8582	311756	1100	Compressor	Electric			0	6,768	0	0	0	6,768	-71	0	0
4242	364371	995	Compressor	Electric			20	6,122	0	0	0	6,142	-64	0	0
4242	364373	995	Compressor	Electric			0	6,122	0	0	0	6,122	-64	0	0
4242	364374	995	Compressor	Electric			0	6,122	0	0	0	6,122	-64	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Lean, Non-Major</b>															
17953	384810	810	Generator	Ox Cat			0	0	3.47	0	0	3.5	0	0	0
800127	169969	328	Generator		Ox Cat		20	0	0	1.41	0	21.6	0	0	0
800127	169970	328	Generator		Ox Cat		0	0	0	1.41	0	1.4	0	0	0
800127	169971	328	Generator		Ox Cat		0	0	0	1.41	0	1.4	0	0	0
800127	169972	328	Generator		Ox Cat		0	0	0	1.41	0	1.4	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
101369	292228	88	Generator		Ox Cat		0	0	0	0.38	0	0.4	0	0	0
800363	347919	300	Compressor		Ox Cat		0	0	0	0	0	0	0	0	0
800189	457333	218	Pump		Ox Cat		20	0	0	0	0	20.1	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Rich, =&gt;1000</b>															
007417	409351	2200	Generator				0	0	0	0	0	0	0	0	0
11245	406575	2080	Generator				0	0	0	0	0	0	0	0	0
11245	406576	2080	Generator				0	0	0	0	0	0	0	0	0
11245	406577	2080	Generator				0	0	0	0	0	0	0	0	0
132687	401752	1898	Generator				0	0	0	0	0	0	0	0	0
132687	401753	1898	Generator				0	0	0	0	0	0	0	0	0
129033	388869	1695	Generator				0	0	0	0	0	0	0	0	0
129033	388870	1695	Generator				0	0	0	0	0	0	0	0	0
129033	388871	1695	Generator				0	0	0	0	0	0	0	0	0
129033	388873	1695	Generator				0	0	0	0	0	0	0	0	0
129033	388875	1695	Generator				0	0	0	0	0	0	0	0	0
129033	388876	1695	Generator				0	0	0	0	0	0	0	0	0
129033	388877	1695	Generator				0	0	0	0	0	0	0	0	0
3513	399704	1692	Generator				0	0	0	0	0	0	0	0	0
3513	399705	1692	Generator				0	0	0	0	0	0	0	0	0
6324	416768	1478	Generator				0	0	0	0	0	0	0	0	0
6324	416769	1478	Generator				0	0	0	0	0	0	0	0	0
67399	401572	1470	Generator				0	0	0	0	0	0	0	0	0
43880	434981	1050	Compressor				0	0	0	0	0	0	0	0	0
43880	434982	1050	Compressor				0	0	0	0	0	0	0	0	0
43880	434983	1050	Compressor				0	0	0	0	0	0	0	0	0
136965	416861	2000	Pump				0	0	0	0	0	0	0	0	0
68112	423950	2000	Pump				0	0	0	0	0	0	0	0	0
800236	377389	1564	Pump				0	0	0	0	0	0	0	0	0
800236	377395	1564	Pump				0	0	0	0	0	0	0	0	0
800236	377397	1564	Pump				0	0	0	0	0	0	0	0	0
800236	377399	1564	Pump				0	0	0	0	0	0	0	0	0
800236	377400	1564	Pump				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Rich, &lt;1000</b>															
96326	434798	999	Generator				20	0	0	0	0	20.1	0	0	0
96326	434799	999	Generator				0	0	0	0	0	0	0	0	0
1912	408888	998	Generator				20	0	0	0	0	20.1	0	0	0
1912	408889	998	Generator				0	0	0	0	0	0	0	0	0
001703	299074	930	Generator				20	0	0	0	0	20.1	0	0	0



**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
001703	331502	930	Generator				0	0	0	0	0	0	0	0	0
120088	387989	930	Generator				20	0	0	0	0	20.1	0	0	0
120088	387990	930	Generator				0	0	0	0	0	0	0	0	0
121454	387995	930	Generator				20	0	0	0	0	20.1	0	0	0
121454	387996	930	Generator				0	0	0	0	0	0	0	0	0
131709	398473	930	Generator				0	0	0	0	0	0	0	0	0
45063	396528	840	Generator				0	0	0	0	0	0	0	0	0
19185	428146	800	Generator				20	0	0	0	0	20.1	0	0	0
138723	422556	792	Generator				20	0	0	0	0	20.1	0	0	0
138723	422557	792	Generator				0	0	0	0	0	0	0	0	0
58639	390872	791	Generator				20	0	0	0	0	20.1	0	0	0
79174	385862	738	Generator				0	0	0	0	0	0	0	0	0
131258	420975	643	Generator				0	0	0	0	0	0	0	0	0
99201	421763	585	Generator				20	0	0	0	0	20.1	0	0	0
139280	424326	585	Generator				0	0	0	0	0	0	0	0	0
99201	421980	584	Generator				20	0	0	0	0	20.1	0	0	0
19185	428143	543	Generator				20	0	0	0	0	20.1	0	0	0
89159	422466	531	Generator				0	0	0	0	0	0	0	0	0
133176	403608	530	Generator				20	0	0	0	0	20.1	0	0	0
133176	403610	530	Generator				0	0	0	0	0	0	0	0	0
133176	403611	530	Generator				0	0	0	0	0	0	0	0	0
132251	409035	530	Generator				20	0	0	0	0	20.1	0	0	0
132251	409036	530	Generator				0	0	0	0	0	0	0	0	0
138293	421366	530	Generator				20	0	0	0	0	20.1	0	0	0
138293	421367	530	Generator				0	0	0	0	0	0	0	0	0
138293	421368	530	Generator				0	0	0	0	0	0	0	0	0
138851	422959	530	Generator				20	0	0	0	0	20.1	0	0	0
138851	422960	530	Generator				0	0	0	0	0	0	0	0	0
141084	431261	530	Generator				20	0	0	0	0	20	0	0	0
141084	431262	530	Generator				0	0	0	0	0	0	0	0	0
70769	408911	495	Generator				0	0	0	0	0	0	0	0	0
140945	430753	380	Generator				0	0	0	0	0	0	0	0	0
65819	389615	366	Generator				0	0	0	0	0	0	0	0	0
137369	418087	350	Generator				0	0	0	0	0	0	0	0	0
118124	417507	336	Generator				0	0	0	0	0	0	0	0	0
118124	417508	336	Generator				0	0	0	0	0	0	0	0	0
131157	391590	310	Generator				20	0	0	0	0	20.1	0	0	0
131157	391591	310	Generator				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
131157	391592	310	Generator				0	0	0	0	0	0	0	0	0
131157	391593	310	Generator				0	0	0	0	0	0	0	0	0
131157	391594	310	Generator				0	0	0	0	0	0	0	0	0
131157	391596	310	Generator				0	0	0	0	0	0	0	0	0
131157	391597	310	Generator				0	0	0	0	0	0	0	0	0
131157	391598	310	Generator				0	0	0	0	0	0	0	0	0
131157	391599	310	Generator				0	0	0	0	0	0	0	0	0
123684	395143	310	Generator				0	0	0	0	0	0	0	0	0
131156	396199	310	Generator				0	0	0	0	0	0	0	0	0
131155	396200	310	Generator				0	0	0	0	0	0	0	0	0
138279	421318	310	Generator				0	0	0	0	0	0	0	0	0
141363	432379	310	Generator				0	0	0	0	0	0	0	0	0
143086	438530	310	Generator				20	0	0	0	0	20.1	0	0	0
143086	438531	310	Generator				0	0	0	0	0	0	0	0	0
143086	438533	310	Generator				0	0	0	0	0	0	0	0	0
143086	438534	310	Generator				0	0	0	0	0	0	0	0	0
133802	405959	282	Generator				20	0	0	0	0	20.1	0	0	0
133802	405960	282	Generator				0	0	0	0	0	0	0	0	0
133802	405961	282	Generator				0	0	0	0	0	0	0	0	0
133802	405962	282	Generator				0	0	0	0	0	0	0	0	0
141084	431264	282	Generator				20	0	0	0	0	20.1	0	0	0
129336	389961	275	Generator				0	0	0	0	0	0	0	0	0
140947	430760	270	Generator				0	0	0	0	0	0	0	0	0
140947	430762	270	Generator				0	0	0	0	0	0	0	0	0
140947	430764	270	Generator				0	0	0	0	0	0	0	0	0
141199	435531	270	Generator				0	0	0	0	0	0	0	0	0
141199	435532	270	Generator				0	0	0	0	0	0	0	0	0
141199	435533	270	Generator				0	0	0	0	0	0	0	0	0
135490	412041	268	Generator				0	0	0	0	0	0	0	0	0
135490	412042	268	Generator				0	0	0	0	0	0	0	0	0
135490	412043	268	Generator				0	0	0	0	0	0	0	0	0
45938	417562	240	Generator				0	0	0	0	0	0	0	0	0
2638	320968	225	Generator				0	0	0	0	0	0	0	0	0
2638	320969	225	Generator				0	0	0	0	0	0	0	0	0
131426	431200	220	Generator				0	0	0	0	0	0	0	0	0
131426	431201	220	Generator				0	0	0	0	0	0	0	0	0
130085	392437	210	Generator				0	0	0	0	0	0	0	0	0
134448	408357	210	Generator				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
134449	408359	210	Generator				0	0	0	0	0	0	0	0	0
138055	420563	210	Generator				0	0	0	0	0	0	0	0	0
138056	420564	210	Generator				0	0	0	0	0	0	0	0	0
140466	428824	210	Generator				0	0	0	0	0	0	0	0	0
82513	433441	202	Generator				20	0	0	0	0	20.1	0	0	0
82513	433442	202	Generator				0	0	0	0	0	0	0	0	0
82513	433443	202	Generator				0	0	0	0	0	0	0	0	0
82513	433444	202	Generator				0	0	0	0	0	0	0	0	0
82513	433445	202	Generator				0	0	0	0	0	0	0	0	0
82513	433446	202	Generator				0	0	0	0	0	0	0	0	0
132653	435512	195	Generator				0	0	0	0	0	0	0	0	0
137976	435522	195	Generator				0	0	0	0	0	0	0	0	0
137976	435523	195	Generator				0	0	0	0	0	0	0	0	0
138791	422748	173	Generator				0	0	0	0	0	0	0	0	0
132182	400404	162	Generator				0	0	0	0	0	0	0	0	0
129434	390240	157	Generator				0	0	0	0	0	0	0	0	0
5023	387253	149	Generator				0	0	0	0	0	0	0	0	0
5023	387254	149	Generator				0	0	0	0	0	0	0	0	0
45882	387483	135	Generator				0	0	0	0	0	0	0	0	0
83509	416748	135	Generator				0	0	0	0	0	0	0	0	0
83509	416749	135	Generator				0	0	0	0	0	0	0	0	0
133802	405963	110	Generator				20	0	0	0	0	20.1	0	0	0
70989	281036	101	Generator				0	0	0	0	0	0	0	0	0
34961	321188	94	Generator				0	0	0	0	0	0	0	0	0
34961	321189	94	Generator				0	0	0	0	0	0	0	0	0
120956	361525	93.8	Generator				0	0	0	0	0	0	0	0	0
116813	372297	86	Generator				0	0	0	0	0	0	0	0	0
116813	372298	86	Generator				0	0	0	0	0	0	0	0	0
116813	372299	86	Generator				0	0	0	0	0	0	0	0	0
16211	403396	86	Generator				0	0	0	0	0	0	0	0	0
16211	403879	86	Generator				0	0	0	0	0	0	0	0	0
16211	403881	86	Generator				0	0	0	0	0	0	0	0	0
16211	403882	86	Generator				0	0	0	0	0	0	0	0	0
16211	403884	86	Generator				0	0	0	0	0	0	0	0	0
16211	403886	86	Generator				0	0	0	0	0	0	0	0	0
129025	388842	80	Generator				0	0	0	0	0	0	0	0	0
129664	391023	80	Generator				0	0	0	0	0	0	0	0	0
115471	409783	74	Generator				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
115471	409784	74	Generator				0	0	0	0	0	0	0	0	0
115471	409785	74	Generator				0	0	0	0	0	0	0	0	0
43759	434971	800	Compressor				20	0	0	0	0	20.1	0	0	0
43759	434972	800	Compressor				0	0	0	0	0	0	0	0	0
43759	434973	800	Compressor				0	0	0	0	0	0	0	0	0
22265	434975	800	Compressor				20	0	0	0	0	20.1	0	0	0
22265	434976	800	Compressor				0	0	0	0	0	0	0	0	0
22265	434977	800	Compressor				0	0	0	0	0	0	0	0	0
013088	342013	700	Compressor				20	0	0	0	0	20.1	0	0	0
013088	416840	700	Compressor				0	0	0	0	0	0	0	0	0
134325	407959	607	Compressor				20	0	0	0	0	20.1	0	0	0
134325	407960	607	Compressor				0	0	0	0	0	0	0	0	0
134325	407961	607	Compressor				0	0	0	0	0	0	0	0	0
134326	407963	607	Compressor				0	0	0	0	0	0	0	0	0
134326	407964	607	Compressor				0	0	0	0	0	0	0	0	0
134326	407965	607	Compressor				0	0	0	0	0	0	0	0	0
134329	407967	607	Compressor				20	0	0	0	0	20.1	0	0	0
134329	407968	607	Compressor				0	0	0	0	0	0	0	0	0
134329	407969	607	Compressor				0	0	0	0	0	0	0	0	0
83111	385480	585	Compressor				0	0	0	0	0	0	0	0	0
18517	434978	530	Compressor				20	0	0	0	0	20.1	0	0	0
18517	434979	530	Compressor				0	0	0	0	0	0	0	0	0
18517	434980	530	Compressor				0	0	0	0	0	0	0	0	0
001703	331499	465	Compressor				20	0	0	0	0	20.1	0	0	0
8309	342750	450	Compressor				0	0	0	0	0	0	0	0	0
53745	350036	415	Compressor				0	0	0	0	0	0	0	0	0
50645	350037	415	Compressor				0	0	0	0	0	0	0	0	0
111116	388705	405	Compressor				0	0	0	0	0	0	0	0	0
140028	429785	400	Compressor				0	0	0	0	0	0	0	0	0
66086	419537	365	Compressor				0	0	0	0	0	0	0	0	0
66086	419538	365	Compressor				0	0	0	0	0	0	0	0	0
019159	331495	330	Compressor				20	0	0	0	0	20.1	0	0	0
22092	367195	292	Compressor				0	0	0	0	0	0	0	0	0
800041	326508	220	Compressor				0	0	0	0	0	0	0	0	0
123664	370691	203	Compressor				0	0	0	0	0	0	0	0	0
94117	347693	200	Compressor				0	0	0	0	0	0	0	0	0
134328	407966	195	Compressor				0	0	0	0	0	0	0	0	0
134330	407970	195	Compressor				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
89852	401453	194	Compressor				0	0	0	0	0	0	0	0	0
64375	386532	158	Compressor				0	0	0	0	0	0	0	0	0
139380	424742	158	Compressor				0	0	0	0	0	0	0	0	0
139380	424743	158	Compressor				0	0	0	0	0	0	0	0	0
139380	424744	158	Compressor				0	0	0	0	0	0	0	0	0
49572	434072	153	Compressor				0	0	0	0	0	0	0	0	0
49572	434472	153	Compressor				0	0	0	0	0	0	0	0	0
49572	434473	153	Compressor				0	0	0	0	0	0	0	0	0
49572	434474	153	Compressor				0	0	0	0	0	0	0	0	0
109393	317735	149	Compressor				0	0	0	0	0	0	0	0	0
109393	317738	149	Compressor				0	0	0	0	0	0	0	0	0
109393	317742	149	Compressor				0	0	0	0	0	0	0	0	0
111345	324916	145	Compressor				0	0	0	0	0	0	0	0	0
18650	328168	145	Compressor				0	0	0	0	0	0	0	0	0
16211	403397	119	Compressor				0	0	0	0	0	0	0	0	0
123664	406670	539	Other				0	0	0	0	0	0	0	0	0
001703	426335	815	Pump				20	0	0	0	0	20.1	0	0	0
001703	373968	814	Pump				0	0	0	0	0	0	0	0	0
96562	353382	750	Pump				20	0	0	0	0	20.1	0	0	0
001703	356818	700	Pump				20	0	0	0	0	20.1	0	0	0
133829	406061	526	Pump				0	0	0	0	0	0	0	0	0
139509	425325	524	Pump				20	0	0	0	0	20.1	0	0	0
139509	425326	524	Pump				0	0	0	0	0	0	0	0	0
139509	425327	524	Pump				0	0	0	0	0	0	0	0	0
111406	416671	512	Pump				0	0	0	0	0	0	0	0	0
54773	415033	473	Pump				20	0	0	0	0	20.1	0	0	0
54773	415034	473	Pump				0	0	0	0	0	0	0	0	0
125016	374784	429	Pump				0	0	0	0	0	0	0	0	0
16239	420868	405	Pump				20	0	0	0	0	20.1	0	0	0
96562	364871	395	Pump				20	0	0	0	0	20.1	0	0	0
96562	364887	395	Pump				0	0	0	0	0	0	0	0	0
98380	292781	369	Pump				20	0	0	0	0	20.1	0	0	0
98380	292782	369	Pump				0	0	0	0	0	0	0	0	0
98380	292784	369	Pump				0	0	0	0	0	0	0	0	0
98380	292785	369	Pump				0	0	0	0	0	0	0	0	0
57555	420687	369	Pump				0	0	0	0	0	0	0	0	0
108286	313977	365	Pump				0	0	0	0	0	0	0	0	0
108293	336542	365	Pump				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
108288	339584	365	Pump				0	0	0	0	0	0	0	0	0
070303	405402	365	Pump				0	0	0	0	0	0	0	0	0
54771	415036	350	Pump				0	0	0	0	0	0	0	0	0
16239	321174	329	Pump				20	0	0	0	0	20.1	0	0	0
16239	321175	329	Pump				0	0	0	0	0	0	0	0	0
16239	321176	329	Pump				0	0	0	0	0	0	0	0	0
16239	321177	329	Pump				0	0	0	0	0	0	0	0	0
52718	342367	321	Pump				0	0	0	0	0	0	0	0	0
52718	342369	321	Pump				0	0	0	0	0	0	0	0	0
87640	342373	321	Pump				0	0	0	0	0	0	0	0	0
94996	359880	310	Pump				0	0	0	0	0	0	0	0	0
94998	407123	310	Pump				0	0	0	0	0	0	0	0	0
95000	439777	310	Pump				0	0	0	0	0	0	0	0	0
94677	428124	305	Pump				0	0	0	0	0	0	0	0	0
5322	422131	289	Pump				0	0	0	0	0	0	0	0	0
52886	388444	246	Pump				0	0	0	0	0	0	0	0	0
52886	388445	246	Pump				0	0	0	0	0	0	0	0	0
52886	388447	246	Pump				0	0	0	0	0	0	0	0	0
52886	388449	246	Pump				0	0	0	0	0	0	0	0	0
52883	388459	246	Pump				0	0	0	0	0	0	0	0	0
52883	388462	246	Pump				0	0	0	0	0	0	0	0	0
070309	333800	225	Pump				0	0	0	0	0	0	0	0	0
070292	334717	225	Pump				20	0	0	0	0	20.1	0	0	0
68181	363123	225	Pump				0	0	0	0	0	0	0	0	0
070290	363870	225	Pump				0	0	0	0	0	0	0	0	0
119118	352647	220	Pump				0	0	0	0	0	0	0	0	0
119118	352648	220	Pump				0	0	0	0	0	0	0	0	0
119118	352649	220	Pump				0	0	0	0	0	0	0	0	0
113029	329845	211	Pump				0	0	0	0	0	0	0	0	0
070280	327127	200	Pump				0	0	0	0	0	0	0	0	0
94678	413795	200	Pump				0	0	0	0	0	0	0	0	0
95000	286934	180	Pump				0	0	0	0	0	0	0	0	0
93720	420807	160	Pump				0	0	0	0	0	0	0	0	0
54773	415030	158	Pump				20	0	0	0	0	20.1	0	0	0
54773	415031	158	Pump				0	0	0	0	0	0	0	0	0
54773	415032	158	Pump				0	0	0	0	0	0	0	0	0
66411	279623	157	Pump				0	0	0	0	0	0	0	0	0
2868	279621	145	Pump				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
120455	359159	145	Pump				0	0	0	0	0	0	0	0	0
120455	359167	145	Pump				0	0	0	0	0	0	0	0	0
070289	390099	145	Pump				0	0	0	0	0	0	0	0	0
94676	413796	145	Pump				0	0	0	0	0	0	0	0	0
94676	413797	145	Pump				0	0	0	0	0	0	0	0	0
94999	286933	137	Pump				0	0	0	0	0	0	0	0	0
132772	401914	125	Pump				0	0	0	0	0	0	0	0	0
136018	413764	95	Pump				0	0	0	0	0	0	0	0	0
125300	375524	80	Pump				0	0	0	0	0	0	0	0	0
125300	375526	80	Pump				0	0	0	0	0	0	0	0	0
125300	375527	80	Pump				0	0	0	0	0	0	0	0	0
125300	375529	80	Pump				0	0	0	0	0	0	0	0	0
14898	389366	75	Pump				0	0	0	0	0	0	0	0	0
14898	389368	75	Pump				0	0	0	0	0	0	0	0	0
136021	413763	74	Pump				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Lean, =&gt;1000</b>															
3671	408492	3352	Generator				0	0	0	0	0	0	0	0	0
3671	408493	3352	Generator				0	0	0	0	0	0	0	0	0
4773	386614	2682	Generator				0	0	0	0	0	0	0	0	0
4773	386615	2682	Generator				0	0	0	0	0	0	0	0	0
21123	405486	2494	Generator				0	0	0	0	0	0	0	0	0
45973	423225	2307	Generator				0	0	0	0	0	0	0	0	0
102153	403632	2095	Generator				0	0	0	0	0	0	0	0	0
102153	403633	2095	Generator				0	0	0	0	0	0	0	0	0
138267	421271	2083	Generator				0	0	0	0	0	0	0	0	0
138267	438902	2083	Generator				0	0	0	0	0	0	0	0	0
65818	422450	1737	Generator				0	0	0	0	0	0	0	0	0
7796	391786	1468	Generator				0	0	0	0	0	0	0	0	0
77033	400718	1468	Generator				0	0	0	0	0	0	0	0	0
109524	413078	1468	Generator				0	0	0	0	0	0	0	0	0
62589	415988	1468	Generator				0	0	0	0	0	0	0	0	0
129827	426299	1468	Generator				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Lean, &lt;1000</b>															
7814	412278	898	Generator				0	0	0	0	0	0	0	0	0
132087	399874	880	Other				20	0	0	0	0	20.1	0	0	0
132087	399876	880	Other				0	0	0	0	0	0	0	0	0
<b>Non-Biogas, Non-RECLAIM, Non-BACT, Rich, =&gt;1000</b>															
14437	288133	1200	Generator Upgrade				0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
14437	288134	1200	Generator	Upgrade			0	0	0	0	0	0	0	0	0
14437	341089	1200	Generator	Upgrade			0	0	0	0	0	0	0	0	0
118684	350357	1131	Generator	Upgrade			0	0	0	0	0	0	0	0	0
118684	350358	1131	Generator	Upgrade			0	0	0	0	0	0	0	0	0
<b>Non-Biogas, Non-RECLAIM, Non-BACT, Rich, &lt;1000</b>															
<u>42218</u>	<u>117607</u>	<u>930</u>	<u>Generator</u>	<u>Upgrade</u>			<u>20</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>20.1</u>	<u>0</u>	<u>0</u>	<u>0</u>
42218	117608	930	Generator	Upgrade			0	0	0	0	0	0	0	0	0
42217	117609	930	Generator	Upgrade			0	0	0	0	0	0	0	0	0
013088	414452	930	Generator	Upgrade			20	0	0	0	0	20.1	0	0	0
142517	438239	713	Generator	Upgrade			0	0	0	0	0	0	0	0	0
85339	274452	315	Generator		Upgrade		0	0	0	0	0	0	0	0	0
86055	279345	294	Generator		Upgrade		0	0	0	0	0	0	0	0	0
20231	281005	150	Generator		Upgrade		20	0	0	0	0	20.1	0	0	0
20231	281006	150	Generator		Upgrade		0	0	0	0	0	0	0	0	0
10636	316911	148	Generator		Upgrade		0	0	0	0	0	0	0	0	0
6728	316912	148	Generator		Upgrade		0	0	0	0	0	0	0	0	0
18435	316913	148	Generator		Upgrade		0	0	0	0	0	0	0	0	0
2638	172356	145	Generator		Upgrade		0	0	0	0	0	0	0	0	0
79856	328255	145	Generator		Upgrade		0	0	0	0	0	0	0	0	0
140598	429420	135	Generator		Upgrade		0	0	0	0	0	0	0	0	0
82303	329294	94	Generator		Upgrade		0	0	0	0	0	0	0	0	0
33465	313771	86	Generator		Upgrade		0	0	0	0	0	0	0	0	0
660	442592	600	Compressor	Upgrade			20	0	0	0	0	20.1	0	0	0
660	442593	600	Compressor	Upgrade			0	0	0	0	0	0	0	0	0
660	442594	600	Compressor	Upgrade			0	0	0	0	0	0	0	0	0
019159	416831	330	Compressor		Upgrade		20	0	0	0	0	20.1	0	0	0
113251	410103	250	Compressor		Upgrade		0	0	0	0	0	0	0	0	0
007417	411022	225	Compressor		Upgrade		20	0	0	0	0	20.1	0	0	0
007417	411023	225	Compressor		Upgrade		0	0	0	0	0	0	0	0	0
007417	411024	225	Compressor		Upgrade		0	0	0	0	0	0	0	0	0
10827	280612	145	Compressor		Upgrade		0	0	0	0	0	0	0	0	0
78802	280570	400	Other		Upgrade		0	0	0	0	0	0	0	0	0
62851	322538	94	Other		Upgrade		0	0	0	0	0	0	0	0	0
65818	311320	810	Pump	Upgrade			20	0	0	0	0	20.1	0	0	0
076581	220569	660	Pump	Upgrade			20	0	0	0	0	20.1	0	0	0
95318	281245	634	Pump	Upgrade			20	0	0	0	0	20.1	0	0	0
95318	281247	634	Pump	Upgrade			0	0	0	0	0	0	0	0	0



**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
95318	281251	634	Pump	Upgrade			0	0	0	0	0	0	0	0	0
95318	281254	634	Pump	Upgrade			0	0	0	0	0	0	0	0	0
95318	281257	634	Pump	Upgrade			0	0	0	0	0	0	0	0	0
95318	281260	634	Pump	Upgrade			0	0	0	0	0	0	0	0	0
95066	280183	594	Pump	Upgrade			0	0	0	0	0	0	0	0	0
94967	280194	594	Pump	Upgrade			0	0	0	0	0	0	0	0	0
48820	159531	581	Pump	Upgrade			0	0	0	0	0	0	0	0	0
77388	426136	525	Pump	Upgrade			20	0	0	0	0	20.1	0	0	0
77388	426144	525	Pump	Upgrade			0	0	0	0	0	0	0	0	0
77388	426145	525	Pump	Upgrade			0	0	0	0	0	0	0	0	0
103070	312478	512	Pump	Upgrade			0	0	0	0	0	0	0	0	0
68143	187169	500	Pump	Upgrade			0	0	0	0	0	0	0	0	0
103052	390939	500	Pump	Upgrade			0	0	0	0	0	0	0	0	0
070296	411474	500	Pump	Upgrade			20	0	0	0	0	20.1	0	0	0
076581	220570	450	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
95977	281266	427	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070282	375501	425	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070286	410481	425	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070292	425052	425	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
15748	280342	417	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
15748	280344	417	Pump		Upgrade		0	0	0	0	0	0	0	0	0
20231	435450	409	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
20231	435451	409	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94950	280975	400	Pump		Upgrade		0	0	0	0	0	0	0	0	0
53733	280999	395	Pump		Upgrade		0	0	0	0	0	0	0	0	0
24427	281000	395	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95535	281109	395	Pump		Upgrade		0	0	0	0	0	0	0	0	0
21104	407532	395	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
65818	311322	370	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
58639	435736	370	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
74396	280341	369	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070292	214307	330	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
070292	214308	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070282	256758	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070311	267082	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
019159	367167	330	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
019159	367168	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070290	367776	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
070296	390974	330	Pump		Upgrade		20	0	0	0	0	20	0	0	0
21104	414791	330	Pump		Upgrade		20	0	0	0	0	20	0	0	0
21104	436827	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
21104	436828	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
21104	436829	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
21104	436830	330	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52348	276622	318	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52348	276625	318	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52348	276627	318	Pump		Upgrade		0	0	0	0	0	0	0	0	0
103052	170492	300	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070305	267083	300	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94940	280974	283	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83315	280968	280	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83315	280969	280	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83315	280970	280	Pump		Upgrade		0	0	0	0	0	0	0	0	0
132190	264164	275	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83313	280967	270	Pump		Upgrade		0	0	0	0	0	0	0	0	0
18239	328539	265	Pump		Upgrade		0	0	0	0	0	0	0	0	0
18239	328540	265	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94998	280360	250	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94999	280365	250	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95000	280369	250	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83312	280965	250	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83312	280966	250	Pump		Upgrade		0	0	0	0	0	0	0	0	0
83318	280971	250	Pump		Upgrade		0	0	0	0	0	0	0	0	0
84162	306922	238	Pump		Upgrade		0	0	0	0	0	0	0	0	0
84162	245380	230	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52885	245384	230	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52885	245385	230	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94442	274654	230	Pump		Upgrade		0	0	0	0	0	0	0	0	0
11301	215041	225	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
11301	215043	225	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070295	267086	225	Pump		Upgrade		0	0	0	0	0	0	0	0	0
11301	311565	225	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
11301	311566	225	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070300	335327	225	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070292	368326	225	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
070304	388598	225	Pump		Upgrade		0	0	0	0	0	0.00	0	0	0
070290	390942	225	Pump		Upgrade		0	0	0	0	0	0.00	0	0	0
070296	390946	225	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
15748	280343	220	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
070298	267085	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070280	267096	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070295	375503	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070302	402959	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070300	433992	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070300	433993	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070300	433994	200	Pump		Upgrade		0	0	0	0	0	0	0	0	0
2924	264159	190	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94938	280976	186	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94937	280978	186	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94937	280980	186	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94937	280981	186	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94995	280355	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94998	280359	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94997	280362	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94999	280364	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95979	281236	180	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
95979	281237	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95979	281240	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95979	281241	180	Pump		Upgrade		0	0	0	0	0	0	0	0	0
132189	264161	175	Pump		Upgrade		0	0	0	0	0	0	0	0	0
72489	288630	172	Pump		Upgrade		0	0	0	0	0	0	0	0	0
72489	288631	172	Pump		Upgrade		0	0	0	0	0	0	0	0	0
72489	288632	172	Pump		Upgrade		0	0	0	0	0	0	0	0	0
81001	246340	170	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070284	267090	165	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070284	267091	165	Pump		Upgrade		0	0	0	0	0	0	0	0	0
2868	274540	157	Pump		Upgrade		0	0	0	0	0	0	0	0	0
2868	279544	157	Pump		Upgrade		0	0	0	0	0	0	0	0	0
66403	279545	157	Pump		Upgrade		0	0	0	0	0	0	0	0	0
66403	279546	157	Pump		Upgrade		0	0	0	0	0	0	0	0	0
66413	279547	157	Pump		Upgrade		0	0	0	0	0	0	0	0	0
94928	280632	150	Pump		Upgrade		0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
94928	280633	150	Pump		Upgrade		0	0	0	0	0	0	0	0	0
20231	281023	150	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
20231	281024	150	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070317	267076	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070299	267084	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070283	267094	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
66413	279624	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
66413	311099	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
66413	311100	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070313	328532	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070281	393971	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
136235	414451	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070293	436931	145	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95979	281242	144	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
95979	281243	144	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52883	245374	143	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52883	245375	143	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070307	267080	140	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95000	280367	140	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95067	280185	137	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95067	280190	137	Pump		Upgrade		0	0	0	0	0	0	0	0	0
95067	280191	137	Pump		Upgrade		0	0	0	0	0	0	0	0	0
52884	245388	121	Pump		Upgrade		0	0	0	0	0	0	0	0	0
96374	280786	116	Pump		Upgrade		0	0	0	0	0	0	0	0	0
96374	280788	116	Pump		Upgrade		0	0	0	0	0	0	0	0	0
96374	280790	116	Pump		Upgrade		0	0	0	0	0	0	0	0	0
3513	399707	109	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
3513	399708	109	Pump		Upgrade		0	0	0	0	0	0	0	0	0
3513	399709	109	Pump		Upgrade		0	0	0	0	0	0	0	0	0
71685	280685	100	Pump		Upgrade		0	0	0	0	0	0	0	0	0
65819	311321	99	Pump		Upgrade		0	0	0	0	0	0	0	0	0
070295	241359	95	Pump		Upgrade		0	0	0	0	0	0	0	0	0
20231	281016	75	Pump		Upgrade		20	0	0	0	0	20.1	0	0	0
20231	281021	75	Pump		Upgrade		0	0	0	0	0	0	0	0	0
48523	288615	61	Pump		Upgrade		0	0	0	0	0	0	0	0	0
48523	288616	61	Pump		Upgrade		0	0	0	0	0	0	0	0	0

**Table B-2 (Continued)**  
**PAR1110.2 - Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Use CEMS, MW-hr/yr	Electric Use Engine, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use Cat Ox, MW-hr/yr	Electric Use SCR, MW-hr/yr	Electric Total, MW-hr/yr	Natural Gas Electric, MMscf/yr	Natural Gas Cat Ox, MMscf/yr	Natural Gas SCR, MMscf/yr
48523	288617	61	Pump		Upgrade		0	0	0	0	0	0	0	0	0
<b>Survey Total</b>							1,975	163,091	3	6	1,581	166,656	-1,718	2.0	152
<b>District Total</b>							2,837	234,326	5	9	2,272	239,448	-2,469	2.9	218

### Control Measure

#### **Install NOx-CO CEMS (CEMS) (costs are for one CEMS serving one or more engines)--Life=20 yrs**

Power use by sample pump, refrigeration condenser and climate control (2,300 W x 8,760 op hr/yr), 2,300 W from Power Systems estimate provided to Dr. Howard Lange, April 12, 2007..

#### **Upgrade Three-Way Catalyst (Upgrade)--NAIC=421730, Life=3 yrs**

For estimate: 1-in. H2O pressure drop, if generator, electrical production decrease, kWh/yr = 0.00074 parasitic factor\*bhp\*8,000 op hr/yr\*0.746 kW/bhp\*0.97 motor efficiency OR if work engine, increased natural gas use by plant, scf/yr = (0.00074 parasitic factor\*bhp\*8,000 op hr/yr\*2545 Btu/bhp)/0.31 motor efficiency/1,020 Btu/scf.

#### **Remove Engine and Replace with Electric Motor (generator engines not replaced) (Electric)--, Life=30 yrs (motor)**

Reduced natural gas use, SCF/yr = (bhp\*8,000 op hr/yr \*2,545 Btu/bhp) /0.31 motor efficiency/1,020 Btu/scf but corresponding increase in grid power production if this engine drives a generator kWh/yr = (bhp\*8,000 op-hr/yr \*0.97 motor efficiency \*0.746 kW/bhp

Increased power use (if non-generator), kWh/yr= (bph\*8,000 op hr/yr)/0.97 motor efficiency \*0.746 kW/bhp

#### **Install fuel gas cleanup system and SCR (SCR)--Life=30 yrs, Mntnc=replace sorbent monthly and catalysts (2) every 3 yrs**

(Catalyst volume & weight.--1 CF per MMBtu/hr [includes ox cat], 1.2 specific gravity. Total cat volume, weight per HP = 14.2 cubic in, 0.615 lb)

For est. pressure drops of 3-in. H2O in cleanup system and 3-in. H2O in SCR+catox system, if generator, electrical production decrease, kWh/yr = 0.00236 parasitic factor \* bhp\*8,000 op hr/yr \*0.97 motor efficiency \*0.746 kW/bhp OR if work engine, increase natural gas use by plant, scf/yr = (0.00236 parasitic factor\*bhp\*8,000 op hr/yr \*2,545 Btu/bhp)/0.31 motor efficiency/1,020 Btu/scf.

**Table B-3  
Hanover Engine Energy Analysis**

Facility ID No.	Appl. No.	Engine HP	Engine Use	Primary Fuel	Natural Gas Usage, MMcft/yr	Natural Gas Energy, MMBtu/yr	Electric Energy, MW-hr/yr
43880	434981	1,050	Compressor	Natural Gas	15.91	16,233	6,078
43880	434982	1,050	Compressor	Natural Gas	13.84	14,121	6,078
43880	434983	1,050	Compressor	Natural Gas	13.84	14,121	6,078
43759	434971	800	Compressor	Natural Gas	12.16	12,407	4,631
43759	434972	800	Compressor	Natural Gas	12.16	12,407	4,631
43759	434973	800	Compressor	Natural Gas	12.16	12,407	4,631
22265	434975	800	Compressor	Natural Gas	10.64	10,857	4,631
22265	434976	800	Compressor	Natural Gas	10.64	10,857	4,631
22265	434977	800	Compressor	Natural Gas	10.64	10,857	4,631
18517	434978	530	Compressor	Natural Gas	8.98	9,157	3,068
18517	434979	530	Compressor	Natural Gas	8.98	9,157	3,068
18517	434980	530	Compressor	Natural Gas	8.98	9,157	3,068
					139	141,739	55,227

**Remove Engine and Replace with Electric Motor (generator engines not replaced) (Electric)-- (motor), Life=30 yrs (motor)**

Reduced natural gas use, SCF/yr = (bhp\*8,000 op hr/yr \*2,545 Btu/bhp) /0.31 motor efficiency/1,020 Btu/scf but corresponding increase in grid power production if this engine drives a generator kWh/yr = (bhp\*8,000 op-hr/yr \*0.97 motor efficiency \*0.746 kW/bhp

**Table B-4**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
<b>Biogas, BACT, =&gt;1000</b>										
025070	394362	4261	Generator			SCR	0	0	0	2,131
025070	394363	4261	Generator			SCR	0	0	0	2,131
025070	394364	4261	Generator			SCR	0	0	0	2,131
9163	323773	1988	Generator			SCR	0	0	0	994
9163	323774	1988	Generator			SCR	0	0	0	994
113674	430422	1877	Generator			SCR	0	0	0	939
113674	430424	1877	Generator			SCR	0	0	0	939
113674	430726	1877	Generator			SCR	0	0	0	939
50310	437561	1877	Generator			SCR	0	0	0	939
50310	437562	1877	Generator			SCR	0	0	0	939
50310	437563	1877	Generator			SCR	0	0	0	939
50310	437564	1877	Generator			SCR	0	0	0	939
50310	437565	1877	Generator			SCR	0	0	0	939
6979	438643	1777	Generator			SCR	0	0	0	889
140846	430412	1468	Generator			SCR	0	0	0	734
74413	390032	1350	Generator			SCR	0	0	0	675
<b>Biogas, BACT, &lt;1000</b>										
013088	414294	400	Compressor			SCR	0	0	0	200
<b>Biogas, Non-BACT, =&gt;10000</b>										
104806	323139	4235	Generator			SCR	0	0	0	2,118
104806	323140	4235	Generator			SCR	0	0	0	2,118
29110	414653	4166	Generator			SCR	0	0	0	2,083
29110	414654	4166	Generator			SCR	0	0	0	2,083
29110	414655	4166	Generator			SCR	0	0	0	2,083
29110	414656	4166	Generator			SCR	0	0	0	2,083
29110	414657	4166	Generator			SCR	0	0	0	2,083
17301	414648	3471	Generator			SCR	0	0	0	1,736
17301	414650	3471	Generator			SCR	0	0	0	1,736
17301	414651	3471	Generator			SCR	0	0	0	1,736
113518	414941	2650	Generator			SCR	0	0	0	1,325
113518	414942	2650	Generator			SCR	0	0	0	1,325
113518	414943	2650	Generator			SCR	0	0	0	1,325

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
142408	437742	2650	Generator			SCR	0	0	0	1,325
142408	437743	2650	Generator			SCR	0	0	0	1,325
142408	437744	2650	Generator			SCR	0	0	0	1,325
142408	437745	2650	Generator			SCR	0	0	0	1,325
142408	437746	2650	Generator			SCR	0	0	0	1,325
142417	437754	2650	Generator			SCR	0	0	0	1,325
142417	437755	2650	Generator			SCR	0	0	0	1,325
9961	301547	1599	Generator			SCR	0	0	0	800
9961	301548	1599	Generator			SCR	0	0	0	800
9961	301549	1599	Generator			SCR	0	0	0	800
135216	411148	1408	Generator			SCR	0	0	0	704
135216	411147	1158	Generator			SCR	0	0	0	579
<b>Biogas, Non-BACT &lt;1000</b>										
9163	433835	920	Generator			SCR	0	0	0	460
1179	438072	911	Generator			SCR	0	0	0	456
11301	160410	750	Generator			SCR	0	0	0	375
11301	160411	750	Generator			SCR	0	0	0	375
022674	351750	705	Generator			SCR	0	0	0	353
13433	319394	580	Generator			SCR	0	0	0	290
13433	319395	580	Generator			SCR	0	0	0	290
13433	319396	580	Generator			SCR	0	0	0	290
3866	172772	636	Compressor			SCR	0	0	0	318
001703	373739	530	Compressor			SCR	0	0	0	265
001703	373740	530	Compressor			SCR	0	0	0	265
019159	416944	260	Compressor			SCR	0	0	0	130
<b>Non-Biogas, RECLAIM, BACT, Rich, Major</b>										
68118	436966	2000	Pump				0	0	0	0
<b>Non-Biogas, RECLAIM, BACT, Rich, Non-Major</b>										
800128	367656	818	Generator				0	0	0	0
800128	367657	818	Generator				0	0	0	0
800128	367658	818	Generator				0	0	0	0
800128	367659	818	Generator				0	0	0	0
18455	406950	600	Generator				0	0	0	0



**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
18455	406951	564	Generator				0	0	0	0
18455	406952	564	Generator				0	0	0	0
141012	432686	790	Compressor				0	0	0	0
141012	432687	790	Compressor				0	0	0	0
800127	274839	750	Compressor				0	0	0	0
346	335791	545	Compressor				0	0	0	0
100844	425811	412	Compressor				0	0	0	0
6714	408065	283	Pump				0	0	0	0
6714	408067	283	Pump				0	0	0	0
6714	408064	116	Pump				0	0	0	0
6714	408068	116	Pump				0	0	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Rich, Major</b>										
130211	414383	2068	Generator	Upgrade			0	0	83	0
<b>Non-Biogas, RECLAIM, Non-BACT, Rich, Non-Major</b>										
98159	332851	870	Generator	Upgrade			0	0	35	0
5973	362357	818	Generator	Upgrade			0	0	33	0
5973	362358	818	Generator	Upgrade			0	0	33	0
5973	362359	818	Generator	Upgrade			0	0	33	0
54547	171158	125	Generator		Upgrade		0	0	5.0	0
5973	101703	738	Compressor	Upgrade			0	0	30	0
5973	101704	738	Compressor	Upgrade			0	0	30	0
75531	319404	250	Compressor		Upgrade		0	0	10	0
75531	319405	250	Compressor		Upgrade		0	0	10	0
11034	190074	132	Compressor		Upgrade		0	0	5.3	0
11034	190075	132	Compressor		Upgrade		0	0	5.3	0
11034	190076	132	Compressor		Upgrade		0	0	5.3	0
800189	457331	708	Pump	Upgrade			0	0	28	0
800189	457332	708	Pump	Upgrade			0	0	28	0
11034	156967	377	Pump		Upgrade		0	0	15	0
11034	156968	377	Pump		Upgrade		0	0	15	0
9053	434478	377	Pump		Upgrade		0	0	15	0
9053	434498	377	Pump		Upgrade		0	0	15	0
9053	434501	377	Pump		Upgrade		0	0	15	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
11034	156966	287	Pump		Upgrade		0	0	11	0
9053	434502	244	Pump		Upgrade		0	0	10	0
9053	434503	244	Pump		Upgrade		0	0	10	0
9053	434504	244	Pump		Upgrade		0	0	10	0
800189	457324	218	Pump		Upgrade		0	0	8.7	0
800189	457335	218	Pump		Upgrade		0	0	8.7	0
11034	190071	193	Pump		Upgrade		0	0	7.7	0
11034	190072	193	Pump		Upgrade		0	0	7.7	0
11034	190073	193	Pump		Upgrade		0	0	7.7	0
800189	457334	151	Pump		Upgrade		0	0	6.0	0
800189	457325	102	Pump		Upgrade		0	0	4.1	0
800189	457326	102	Pump		Upgrade		0	0	4.1	0
8582	198426	97	Pump		Upgrade		0	0	3.9	0
8582	198427	97	Pump		Upgrade		0	0	3.9	0
8582	198428	97	Pump		Upgrade		0	0	3.9	0
9217	196405	86	Pump		Upgrade		0	0	3.4	0
9217	196409	86	Pump		Upgrade		0	0	3.4	0
<b>Non-Biogas, RECLAIM, Non-BACT, Lean, Major, 4-Stroke</b>										
5973	147546	5500	Compressor	Ox Cat			0	220	0	0
5973	156060	5500	Compressor	Ox Cat			0	220	0	0
5973	156061	5500	Compressor	Ox Cat			0	220	0	0
5973	156062	5500	Compressor	Ox Cat			0	220	0	0
5973	156063	5500	Compressor	Ox Cat			0	220	0	0
800128	153507	2000	Compressor	Ox Cat			0	80	0	0
800128	159101	2000	Compressor	Ox Cat			0	80	0	0
800128	159102	2000	Compressor	Ox Cat			0	80	0	0
800128	159103	2000	Compressor	Ox Cat			0	80	0	0
800128	159104	2000	Compressor	Ox Cat			0	80	0	0
9053	434505	1650	Compressor	Ox Cat			0	66	0	0
9053	434506	1650	Compressor	Ox Cat			0	66	0	0
9053	434507	1650	Compressor	Ox Cat			0	66	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Lean, Major, 2-Stroke</b>										
4242	170675	3000	Generator	Electric			14,000	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
8582	368116	2000	Compressor	Electric			14,000	0	0	0
8582	368117	2000	Compressor	Electric			14,000	0	0	0
8582	368118	2000	Compressor	Electric			14,000	0	0	0
4242	169829	3200	Compressor	Electric			14,000	0	0	0
4242	172126	3000	Compressor	Electric			14,000	0	0	0
800127	327697	1800	Compressor	Electric			14,000	0	0	0
800127	327699	1800	Compressor	Electric			14,000	0	0	0
8582	311760	1350	Compressor	Electric			14,000	0	0	0
8582	311761	1350	Compressor	Electric			14,000	0	0	0
8582	311755	1100	Compressor	Electric			14,000	0	0	0
8582	311756	1100	Compressor	Electric			14,000	0	0	0
4242	364371	995	Compressor	Electric			14,000	0	0	0
4242	364373	995	Compressor	Electric			14,000	0	0	0
4242	364374	995	Compressor	Electric			14,000	0	0	0
<b>Non-Biogas, RECLAIM, Non-BACT, Lean, Non-Major</b>										
17953	384810	810	Generator	Ox Cat			0	32	0	0
800127	169969	328	Generator		Ox Cat		0	0	0	0
800127	169970	328	Generator		Ox Cat		0	0	0	0
800127	169971	328	Generator		Ox Cat		0	0	0	0
800127	169972	328	Generator		Ox Cat		0	0	0	0
101369	292228	88	Generator		Ox Cat		0	0	0	0
800363	347919	300	Compressor		Ox Cat		0	0	0	0
800189	457333	218	Pump		Ox Cat		0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Rich, =&gt;1000</b>										
007417	409351	2200	Generator				0	0	0	0
11245	406575	2080	Generator				0	0	0	0
11245	406576	2080	Generator				0	0	0	0
11245	406577	2080	Generator				0	0	0	0
132687	401752	1898	Generator				0	0	0	0
132687	401753	1898	Generator				0	0	0	0
129033	388869	1695	Generator				0	0	0	0
129033	388870	1695	Generator				0	0	0	0
129033	388871	1695	Generator				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
129033	388873	1695	Generator				0	0	0	0
129033	388875	1695	Generator				0	0	0	0
129033	388876	1695	Generator				0	0	0	0
129033	388877	1695	Generator				0	0	0	0
3513	399704	1692	Generator				0	0	0	0
3513	399705	1692	Generator				0	0	0	0
6324	416768	1478	Generator				0	0	0	0
6324	416769	1478	Generator				0	0	0	0
67399	401572	1470	Generator				0	0	0	0
43880	434981	1050	Compressor				0	0	0	0
43880	434982	1050	Compressor				0	0	0	0
43880	434983	1050	Compressor				0	0	0	0
136965	416861	2000	Pump				0	0	0	0
68112	423950	2000	Pump				0	0	0	0
800236	377389	1564	Pump				0	0	0	0
800236	377395	1564	Pump				0	0	0	0
800236	377397	1564	Pump				0	0	0	0
800236	377399	1564	Pump				0	0	0	0
800236	377400	1564	Pump				0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Rich, &lt;1000</b>										
96326	434798	999	Generator				0	0	0	0
96326	434799	999	Generator				0	0	0	0
1912	408888	998	Generator				0	0	0	0
1912	408889	998	Generator				0	0	0	0
001703	299074	930	Generator				0	0	0	0
001703	331502	930	Generator				0	0	0	0
120088	387989	930	Generator				0	0	0	0
120088	387990	930	Generator				0	0	0	0
121454	387995	930	Generator				0	0	0	0
121454	387996	930	Generator				0	0	0	0
131709	398473	930	Generator				0	0	0	0
45063	396528	840	Generator				0	0	0	0
19185	428146	800	Generator				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
138723	422556	792	Generator				0	0	0	0
138723	422557	792	Generator				0	0	0	0
58639	390872	791	Generator				0	0	0	0
79174	385862	738	Generator				0	0	0	0
131258	420975	643	Generator				0	0	0	0
99201	421763	585	Generator				0	0	0	0
139280	424326	585	Generator				0	0	0	0
99201	421980	584	Generator				0	0	0	0
19185	428143	543	Generator				0	0	0	0
89159	422466	531	Generator				0	0	0	0
133176	403608	530	Generator				0	0	0	0
133176	403610	530	Generator				0	0	0	0
133176	403611	530	Generator				0	0	0	0
132251	409035	530	Generator				0	0	0	0
132251	409036	530	Generator				0	0	0	0
138293	421366	530	Generator				0	0	0	0
138293	421367	530	Generator				0	0	0	0
138293	421368	530	Generator				0	0	0	0
138851	422959	530	Generator				0	0	0	0
138851	422960	530	Generator				0	0	0	0
141084	431261	530	Generator				0	0	0	0
141084	431262	530	Generator				0	0	0	0
70769	408911	495	Generator				0	0	0	0
140945	430753	380	Generator				0	0	0	0
65819	389615	366	Generator				0	0	0	0
137369	418087	350	Generator				0	0	0	0
118124	417507	336	Generator				0	0	0	0
118124	417508	336	Generator				0	0	0	0
131157	391590	310	Generator				0	0	0	0
131157	391591	310	Generator				0	0	0	0
131157	391592	310	Generator				0	0	0	0
131157	391593	310	Generator				0	0	0	0
131157	391594	310	Generator				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
131157	391596	310	Generator				0	0	0	0
131157	391597	310	Generator				0	0	0	0
131157	391598	310	Generator				0	0	0	0
131157	391599	310	Generator				0	0	0	0
123684	395143	310	Generator				0	0	0	0
131156	396199	310	Generator				0	0	0	0
131155	396200	310	Generator				0	0	0	0
138279	421318	310	Generator				0	0	0	0
141363	432379	310	Generator				0	0	0	0
143086	438530	310	Generator				0	0	0	0
143086	438531	310	Generator				0	0	0	0
143086	438533	310	Generator				0	0	0	0
143086	438534	310	Generator				0	0	0	0
133802	405959	282	Generator				0	0	0	0
133802	405960	282	Generator				0	0	0	0
133802	405961	282	Generator				0	0	0	0
133802	405962	282	Generator				0	0	0	0
141084	431264	282	Generator				0	0	0	0
129336	389961	275	Generator				0	0	0	0
140947	430760	270	Generator				0	0	0	0
140947	430762	270	Generator				0	0	0	0
140947	430764	270	Generator				0	0	0	0
141199	435531	270	Generator				0	0	0	0
141199	435532	270	Generator				0	0	0	0
141199	435533	270	Generator				0	0	0	0
135490	412041	268	Generator				0	0	0	0
135490	412042	268	Generator				0	0	0	0
135490	412043	268	Generator				0	0	0	0
45938	417562	240	Generator				0	0	0	0
2638	320968	225	Generator				0	0	0	0
2638	320969	225	Generator				0	0	0	0
131426	431200	220	Generator				0	0	0	0
131426	431201	220	Generator				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
130085	392437	210	Generator				0	0	0	0
134448	408357	210	Generator				0	0	0	0
134449	408359	210	Generator				0	0	0	0
138055	420563	210	Generator				0	0	0	0
138056	420564	210	Generator				0	0	0	0
140466	428824	210	Generator				0	0	0	0
82513	433441	202	Generator				0	0	0	0
82513	433442	202	Generator				0	0	0	0
82513	433443	202	Generator				0	0	0	0
82513	433444	202	Generator				0	0	0	0
82513	433445	202	Generator				0	0	0	0
82513	433446	202	Generator				0	0	0	0
132653	435512	195	Generator				0	0	0	0
137976	435522	195	Generator				0	0	0	0
137976	435523	195	Generator				0	0	0	0
138791	422748	173	Generator				0	0	0	0
132182	400404	162	Generator				0	0	0	0
129434	390240	157	Generator				0	0	0	0
5023	387253	149	Generator				0	0	0	0
5023	387254	149	Generator				0	0	0	0
45882	387483	135	Generator				0	0	0	0
83509	416748	135	Generator				0	0	0	0
83509	416749	135	Generator				0	0	0	0
133802	405963	110	Generator				0	0	0	0
70989	281036	101	Generator				0	0	0	0
34961	321188	94	Generator				0	0	0	0
34961	321189	94	Generator				0	0	0	0
120956	361525	93.8	Generator				0	0	0	0
116813	372297	86	Generator				0	0	0	0
116813	372298	86	Generator				0	0	0	0
116813	372299	86	Generator				0	0	0	0
16211	403396	86	Generator				0	0	0	0
16211	403879	86	Generator				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
16211	403881	86	Generator				0	0	0	0
16211	403882	86	Generator				0	0	0	0
16211	403884	86	Generator				0	0	0	0
16211	403886	86	Generator				0	0	0	0
129025	388842	80	Generator				0	0	0	0
129664	391023	80	Generator				0	0	0	0
115471	409783	74	Generator				0	0	0	0
115471	409784	74	Generator				0	0	0	0
115471	409785	74	Generator				0	0	0	0
43759	434971	800	Compressor				0	0	0	0
43759	434972	800	Compressor				0	0	0	0
43759	434973	800	Compressor				0	0	0	0
22265	434975	800	Compressor				0	0	0	0
22265	434976	800	Compressor				0	0	0	0
22265	434977	800	Compressor				0	0	0	0
013088	342013	700	Compressor				0	0	0	0
013088	416840	700	Compressor				0	0	0	0
134325	407959	607	Compressor				0	0	0	0
134325	407960	607	Compressor				0	0	0	0
134325	407961	607	Compressor				0	0	0	0
134326	407963	607	Compressor				0	0	0	0
134326	407964	607	Compressor				0	0	0	0
134326	407965	607	Compressor				0	0	0	0
134329	407967	607	Compressor				0	0	0	0
134329	407968	607	Compressor				0	0	0	0
134329	407969	607	Compressor				0	0	0	0
83111	385480	585	Compressor				0	0	0	0
18517	434978	530	Compressor				0	0	0	0
18517	434979	530	Compressor				0	0	0	0
18517	434980	530	Compressor				0	0	0	0
001703	331499	465	Compressor				0	0	0	0
8309	342750	450	Compressor				0	0	0	0
53745	350036	415	Compressor				0	0	0	0



**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
50645	350037	415	Compressor				0	0	0	0
111116	388705	405	Compressor				0	0	0	0
140028	429785	400	Compressor				0	0	0	0
66086	419537	365	Compressor				0	0	0	0
66086	419538	365	Compressor				0	0	0	0
019159	331495	330	Compressor				0	0	0	0
22092	367195	292	Compressor				0	0	0	0
800041	326508	220	Compressor				0	0	0	0
123664	370691	203	Compressor				0	0	0	0
94117	347693	200	Compressor				0	0	0	0
134328	407966	195	Compressor				0	0	0	0
134330	407970	195	Compressor				0	0	0	0
89852	401453	194	Compressor				0	0	0	0
64375	386532	158	Compressor				0	0	0	0
139380	424742	158	Compressor				0	0	0	0
139380	424743	158	Compressor				0	0	0	0
139380	424744	158	Compressor				0	0	0	0
49572	434072	153	Compressor				0	0	0	0
49572	434472	153	Compressor				0	0	0	0
49572	434473	153	Compressor				0	0	0	0
49572	434474	153	Compressor				0	0	0	0
109393	317735	149	Compressor				0	0	0	0
109393	317738	149	Compressor				0	0	0	0
109393	317742	149	Compressor				0	0	0	0
111345	324916	145	Compressor				0	0	0	0
18650	328168	145	Compressor				0	0	0	0
16211	403397	119	Compressor				0	0	0	0
123664	406670	539	Other				0	0	0	0
001703	426335	815	Pump				0	0	0	0
001703	373968	814	Pump				0	0	0	0
96562	353382	750	Pump				0	0	0	0
001703	356818	700	Pump				0	0	0	0
133829	406061	526	Pump				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
139509	425325	524	Pump				0	0	0	0
139509	425326	524	Pump				0	0	0	0
139509	425327	524	Pump				0	0	0	0
111406	416671	512	Pump				0	0	0	0
54773	415033	473	Pump				0	0	0	0
54773	415034	473	Pump				0	0	0	0
125016	374784	429	Pump				0	0	0	0
16239	420868	405	Pump				0	0	0	0
96562	364871	395	Pump				0	0	0	0
96562	364887	395	Pump				0	0	0	0
98380	292781	369	Pump				0	0	0	0
98380	292782	369	Pump				0	0	0	0
98380	292784	369	Pump				0	0	0	0
98380	292785	369	Pump				0	0	0	0
57555	420687	369	Pump				0	0	0	0
108286	313977	365	Pump				0	0	0	0
108293	336542	365	Pump				0	0	0	0
108288	339584	365	Pump				0	0	0	0
070303	405402	365	Pump				0	0	0	0
54771	415036	350	Pump				0	0	0	0
16239	321174	329	Pump				0	0	0	0
16239	321175	329	Pump				0	0	0	0
16239	321176	329	Pump				0	0	0	0
16239	321177	329	Pump				0	0	0	0
52718	342367	321	Pump				0	0	0	0
52718	342369	321	Pump				0	0	0	0
87640	342373	321	Pump				0	0	0	0
94996	359880	310	Pump				0	0	0	0
94998	407123	310	Pump				0	0	0	0
95000	439777	310	Pump				0	0	0	0
94677	428124	305	Pump				0	0	0	0
5322	422131	289	Pump				0	0	0	0
52886	388444	246	Pump				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
52886	388445	246	Pump				0	0	0	0
52886	388447	246	Pump				0	0	0	0
52886	388449	246	Pump				0	0	0	0
52883	388459	246	Pump				0	0	0	0
52883	388462	246	Pump				0	0	0	0
070309	333800	225	Pump				0	0	0	0
070292	334717	225	Pump				0	0	0	0
68181	363123	225	Pump				0	0	0	0
070290	363870	225	Pump				0	0	0	0
119118	352647	220	Pump				0	0	0	0
119118	352648	220	Pump				0	0	0	0
119118	352649	220	Pump				0	0	0	0
113029	329845	211	Pump				0	0	0	0
070280	327127	200	Pump				0	0	0	0
94678	413795	200	Pump				0	0	0	0
95000	286934	180	Pump				0	0	0	0
93720	420807	160	Pump				0	0	0	0
54773	415030	158	Pump				0	0	0	0
54773	415031	158	Pump				0	0	0	0
54773	415032	158	Pump				0	0	0	0
66411	279623	157	Pump				0	0	0	0
2868	279621	145	Pump				0	0	0	0
120455	359159	145	Pump				0	0	0	0
120455	359167	145	Pump				0	0	0	0
070289	390099	145	Pump				0	0	0	0
94676	413796	145	Pump				0	0	0	0
94676	413797	145	Pump				0	0	0	0
94999	286933	137	Pump				0	0	0	0
132772	401914	125	Pump				0	0	0	0
136018	413764	95	Pump				0	0	0	0
125300	375524	80	Pump				0	0	0	0
125300	375526	80	Pump				0	0	0	0
125300	375527	80	Pump				0	0	0	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
125300	375529	80	Pump				0	0	0	0
14898	389366	75	Pump				0	0	0	0
14898	389368	75	Pump				0	0	0	0
136021	413763	74	Pump				0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Lean, =&gt;1000</b>										
3671	408492	3352	Generator				0	0	0	0
3671	408493	3352	Generator				0	0	0	0
4773	386614	2682	Generator				0	0	0	0
4773	386615	2682	Generator				0	0	0	0
21123	405486	2494	Generator				0	0	0	0
45973	423225	2307	Generator				0	0	0	0
102153	403632	2095	Generator				0	0	0	0
102153	403633	2095	Generator				0	0	0	0
138267	421271	2083	Generator				0	0	0	0
138267	438902	2083	Generator				0	0	0	0
65818	422450	1737	Generator				0	0	0	0
7796	391786	1468	Generator				0	0	0	0
77033	400718	1468	Generator				0	0	0	0
109524	413078	1468	Generator				0	0	0	0
62589	415988	1468	Generator				0	0	0	0
129827	426299	1468	Generator				0	0	0	0
<b>Non-Biogas, Non-RECLAIM, BACT, Lean, &lt;1000</b>										
7814	412278	898	Generator				0	0	0	0
132087	399874	880	Other				0	0	0	0
132087	399876	880	Other				0	0	0	0
<b>Non-Biogas, Non-RECLAIM, Non-BACT, Rich, =&gt;1000</b>										
14437	288133	1200	Generator	Upgrade			0	0	48	0
14437	288134	1200	Generator	Upgrade			0	0	48	0
14437	341089	1200	Generator	Upgrade			0	0	48	0
118684	350357	1131	Generator	Upgrade			0	0	45	0
118684	350358	1131	Generator	Upgrade			0	0	45	0
<b>Non-Biogas, Non-RECLAIM, Non-BACT, Rich, &lt;1000</b>										
42218	117607	930	Generator	Upgrade			0	0	37	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
42218	117608	930	Generator	Upgrade			0	0	37	0
42217	117609	930	Generator	Upgrade			0	0	37	0
013088	414452	930	Generator	Upgrade			0	0	37	0
142517	438239	713	Generator	Upgrade			0	0	29	0
85339	274452	315	Generator		Upgrade		0	0	13	0
86055	279345	294	Generator		Upgrade		0	0	12	0
20231	281005	150	Generator		Upgrade		0	0	6.0	0
20231	281006	150	Generator		Upgrade		0	0	6.0	0
10636	316911	148	Generator		Upgrade		0	0	5.9	0
6728	316912	148	Generator		Upgrade		0	0	5.9	0
18435	316913	148	Generator		Upgrade		0	0	5.9	0
2638	172356	145	Generator		Upgrade		0	0	5.8	0
79856	328255	145	Generator		Upgrade		0	0	5.8	0
140598	429420	135	Generator		Upgrade		0	0	5.4	0
82303	329294	94	Generator		Upgrade		0	0	3.8	0
33465	313771	86	Generator		Upgrade		0	0	3.4	0
660	442592	600	Compressor	Upgrade			0	0	24	0
660	442593	600	Compressor	Upgrade			0	0	24	0
660	442594	600	Compressor	Upgrade			0	0	24	0
019159	416831	330	Compressor		Upgrade		0	0	13	0
113251	410103	250	Compressor		Upgrade		0	0	10	0
007417	411022	225	Compressor		Upgrade		0	0	9.0	0
007417	411023	225	Compressor		Upgrade		0	0	9.0	0
007417	411024	225	Compressor		Upgrade		0	0	9.0	0
10827	280612	145	Compressor		Upgrade		0	0	5.8	0
78802	280570	400	Other		Upgrade		0	0	16	0
62851	322538	94	Other		Upgrade		0	0	3.8	0
65818	311320	810	Pump	Upgrade			0	0	32	0
076581	220569	660	Pump	Upgrade			0	0	26	0
95318	281245	634	Pump	Upgrade			0	0	25	0
95318	281247	634	Pump	Upgrade			0	0	25	0
95318	281251	634	Pump	Upgrade			0	0	25	0
95318	281254	634	Pump	Upgrade			0	0	25	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
95318	281257	634	Pump	Upgrade			0	0	25	0
95318	281260	634	Pump	Upgrade			0	0	25	0
95066	280183	594	Pump	Upgrade			0	0	24	0
94967	280194	594	Pump	Upgrade			0	0	24	0
48820	159531	581	Pump	Upgrade			0	0	23	0
77388	426136	525	Pump	Upgrade			0	0	21	0
77388	426144	525	Pump	Upgrade			0	0	21	0
77388	426145	525	Pump	Upgrade			0	0	21	0
103070	312478	512	Pump	Upgrade			0	0	20	0
68143	187169	500	Pump	Upgrade			0	0	20	0
103052	390939	500	Pump	Upgrade			0	0	20	0
070296	411474	500	Pump	Upgrade			0	0	20	0
076581	220570	450	Pump		Upgrade		0	0	18	0
95977	281266	427	Pump		Upgrade		0	0	17	0
070282	375501	425	Pump		Upgrade		0	0	17	0
070286	410481	425	Pump		Upgrade		0	0	17	0
070292	425052	425	Pump		Upgrade		0	0	17	0
15748	280342	417	Pump		Upgrade		0	0	17	0
15748	280344	417	Pump		Upgrade		0	0	17	0
20231	435450	409	Pump		Upgrade		0	0	16	0
20231	435451	409	Pump		Upgrade		0	0	16	0
94950	280975	400	Pump		Upgrade		0	0	16	0
53733	280999	395	Pump		Upgrade		0	0	16	0
24427	281000	395	Pump		Upgrade		0	0	16	0
95535	281109	395	Pump		Upgrade		0	0	16	0
21104	407532	395	Pump		Upgrade		0	0	16	0
65818	311322	370	Pump		Upgrade		0	0	15	0
58639	435736	370	Pump		Upgrade		0	0	15	0
74396	280341	369	Pump		Upgrade		0	0	15	0
070292	214307	330	Pump		Upgrade		0	0	13	0
070292	214308	330	Pump		Upgrade		0	0	13	0
070282	256758	330	Pump		Upgrade		0	0	13	0
070311	267082	330	Pump		Upgrade		0	0	13	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
019159	367167	330	Pump		Upgrade		0	0	13	0
019159	367168	330	Pump		Upgrade		0	0	13	0
070290	367776	330	Pump		Upgrade		0	0	13	0
070296	390974	330	Pump		Upgrade		0	0	13	0
21104	414791	330	Pump		Upgrade		0	0	13	0
21104	436827	330	Pump		Upgrade		0	0	13	0
21104	436828	330	Pump		Upgrade		0	0	13	0
21104	436829	330	Pump		Upgrade		0	0	13	0
21104	436830	330	Pump		Upgrade		0	0	13	0
52348	276622	318	Pump		Upgrade		0	0	13	0
52348	276625	318	Pump		Upgrade		0	0	13	0
52348	276627	318	Pump		Upgrade		0	0	13	0
103052	170492	300	Pump		Upgrade		0	0	12	0
070305	267083	300	Pump		Upgrade		0	0	12	0
94940	280974	283	Pump		Upgrade		0	0	11	0
83315	280968	280	Pump		Upgrade		0	0	11	0
83315	280969	280	Pump		Upgrade		0	0	11	0
83315	280970	280	Pump		Upgrade		0	0	11	0
132190	264164	275	Pump		Upgrade		0	0	11	0
83313	280967	270	Pump		Upgrade		0	0	11	0
18239	328539	265	Pump		Upgrade		0	0	11	0
18239	328540	265	Pump		Upgrade		0	0	11	0
94998	280360	250	Pump		Upgrade		0	0	10	0
94999	280365	250	Pump		Upgrade		0	0	10	0
95000	280369	250	Pump		Upgrade		0	0	10	0
83312	280965	250	Pump		Upgrade		0	0	10	0
83312	280966	250	Pump		Upgrade		0	0	10	0
83318	280971	250	Pump		Upgrade		0	0	10	0
84162	306922	238	Pump		Upgrade		0	0	9.5	0
84162	245380	230	Pump		Upgrade		0	0	9.2	0
52885	245384	230	Pump		Upgrade		0	0	9.2	0
52885	245385	230	Pump		Upgrade		0	0	9.2	0
94442	274654	230	Pump		Upgrade		0	0	9.2	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
11301	215041	225	Pump		Upgrade		0	0	9.0	0
11301	215043	225	Pump		Upgrade		0	0	9.0	0
070295	267086	225	Pump		Upgrade		0	0	9.0	0
11301	311565	225	Pump		Upgrade		0	0	9.0	0
11301	311566	225	Pump		Upgrade		0	0	9.0	0
070300	335327	225	Pump		Upgrade		0	0	9.0	0
070292	368326	225	Pump		Upgrade		0	0	9.0	0
070304	388598	225	Pump		Upgrade		0	0	9.0	0
070290	390942	225	Pump		Upgrade		0	0	9.0	0
070296	390946	225	Pump		Upgrade		0	0	9.0	0
15748	280343	220	Pump		Upgrade		0	0	8.8	0
070298	267085	200	Pump		Upgrade		0	0	8.0	0
070280	267096	200	Pump		Upgrade		0	0	8.0	0
070295	375503	200	Pump		Upgrade		0	0	8.0	0
070302	402959	200	Pump		Upgrade		0	0	8.0	0
070300	433992	200	Pump		Upgrade		0	0	8.0	0
070300	433993	200	Pump		Upgrade		0	0	8.0	0
070300	433994	200	Pump		Upgrade		0	0	8.0	0
2924	264159	190	Pump		Upgrade		0	0	7.6	0
94938	280976	186	Pump		Upgrade		0	0	7.4	0
94937	280978	186	Pump		Upgrade		0	0	7.4	0
94937	280980	186	Pump		Upgrade		0	0	7.4	0
94937	280981	186	Pump		Upgrade		0	0	7.4	0
94995	280355	180	Pump		Upgrade		0	0	7.2	0
94998	280359	180	Pump		Upgrade		0	0	7.2	0
94997	280362	180	Pump		Upgrade		0	0	7.2	0
94999	280364	180	Pump		Upgrade		0	0	7.2	0
95979	281236	180	Pump		Upgrade		0	0	7.2	0
95979	281237	180	Pump		Upgrade		0	0	7.2	0
95979	281240	180	Pump		Upgrade		0	0	7.2	0
95979	281241	180	Pump		Upgrade		0	0	7.2	0
132189	264161	175	Pump		Upgrade		0	0	7.0	0
72489	288630	172	Pump		Upgrade		0	0	6.9	0



**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
72489	288631	172	Pump		Upgrade		0	0	6.9	0
72489	288632	172	Pump		Upgrade		0	0	6.9	0
81001	246340	170	Pump		Upgrade		0	0	6.8	0
070284	267090	165	Pump		Upgrade		0	0	6.6	0
070284	267091	165	Pump		Upgrade		0	0	6.6	0
2868	274540	157	Pump		Upgrade		0	0	6.3	0
2868	279544	157	Pump		Upgrade		0	0	6.3	0
66403	279545	157	Pump		Upgrade		0	0	6.3	0
66403	279546	157	Pump		Upgrade		0	0	6.3	0
66413	279547	157	Pump		Upgrade		0	0	6.3	0
94928	280632	150	Pump		Upgrade		0	0	6.0	0
94928	280633	150	Pump		Upgrade		0	0	6.0	0
20231	281023	150	Pump		Upgrade		0	0	6.0	0
20231	281024	150	Pump		Upgrade		0	0	6.0	0
070317	267076	145	Pump		Upgrade		0	0	5.8	0
070299	267084	145	Pump		Upgrade		0	0	5.8	0
070283	267094	145	Pump		Upgrade		0	0	5.8	0
66413	279624	145	Pump		Upgrade		0	0	5.8	0
66413	311099	145	Pump		Upgrade		0	0	5.8	0
66413	311100	145	Pump		Upgrade		0	0	5.8	0
070313	328532	145	Pump		Upgrade		0	0	5.8	0
070281	393971	145	Pump		Upgrade		0	0	5.8	0
136235	414451	145	Pump		Upgrade		0	0	5.8	0
070293	436931	145	Pump		Upgrade		0	0	5.8	0
95979	281242	144	Pump		Upgrade		0	0	5.8	0
95979	281243	144	Pump		Upgrade		0	0	5.8	0
52883	245374	143	Pump		Upgrade		0	0	5.7	0
52883	245375	143	Pump		Upgrade		0	0	5.7	0
070307	267080	140	Pump		Upgrade		0	0	5.6	0
95000	280367	140	Pump		Upgrade		0	0	5.6	0
95067	280185	137	Pump		Upgrade		0	0	5.5	0
95067	280190	137	Pump		Upgrade		0	0	5.5	0
95067	280191	137	Pump		Upgrade		0	0	5.5	0

**Table B-4 (Continued)**  
**PAR1110.2 - Solid and Hazardous Waste Estimates**

Facility ID No.	Appl. No.	Engine HP	Engine Use	(d)(1)(B) Reduced Limits, 500+ HP 7/1/10	(d)(1)(B) Reduced Limits <500 HP 7/1/11	(d)(1)(C) Reduced Limits Biogas 7/1/12	Electric Engine, lb	New Cat Ox, lb	Upgrade Cat Ox, lb	SCR Cat, lb
52884	245388	121	Pump		Upgrade		0	0	4.8	0
96374	280786	116	Pump		Upgrade		0	0	4.6	0
96374	280788	116	Pump		Upgrade		0	0	4.6	0
96374	280790	116	Pump		Upgrade		0	0	4.6	0
3513	399707	109	Pump		Upgrade		0	0	4.4	0
3513	399708	109	Pump		Upgrade		0	0	4.4	0
3513	399709	109	Pump		Upgrade		0	0	4.4	0
71685	280685	100	Pump		Upgrade		0	0	4.0	0
65819	311321	99	Pump		Upgrade		0	0	4.0	0
070295	241359	95	Pump		Upgrade		0	0	3.8	0
20231	281016	75	Pump		Upgrade		0	0	3.0	0
20231	281021	75	Pump		Upgrade		0	0	3.0	0
48523	288615	61	Pump		Upgrade		0	0	2.4	0
48523	288616	61	Pump		Upgrade		0	0	2.4	0
48523	288617	61	Pump		Upgrade		0	0	2.4	0
<b>Survey Total</b>							210,000	1,730	2,847	59,039
<b>District Total</b>							301,724	2,486	4,090	84,826

Description	Total	Upgrade	Three Year	Annual
Solid Waste	301,724			
Hazardous Waste Recycled		2,454	3,946	1,315
Hazardous Waste Disposed		1,636	87,457	29,152

**Notes**

Data from SCAQMD Staff Survey of ICE engines, 2005. Based on known engines the survey data is representative of 69.6 percent of the ICE engines in the district.

Total district estimated by scaling the survey data by 1.437 (1/0.696)

Oxidation catalyst weight per horsepower = 0.4 pound

SCR catalyst weight per horsepower = 0.5 pound

Average engine weight 14,000 pounds

Assumed all catalyst is hazardous waste

Assumed 60 percent of oxidation catalyst is recycled based on SCAQMD, 2003 Final AQMP Program EIR, 2003. SCR catalyst is not recycled.

Upgrade, Hazardous Waste Recycled = 0.6 x District total upgraded catalyst.

Upgrade, Hazardous Waste Disposed = 0.6 x District total upgraded catalyst.

Three year, Hazardous Waste Recycled = 0.6 x (District total new cat ox + District total upgrade cat ox)

Three year, Hazardous Waste Disposed =  $0.4 \times (\text{District total new cat ox} + \text{District total upgrade cat ox}) + \text{District total SCR cat}$   
Annual, Hazardous Waste Recycled =  $\text{Three year, Hazardous Waste Recycled} / 3 \text{ years}$   
Annual, Hazardous Waste Disposed =  $\text{Three year, Hazardous Waste Disposed} / 3 \text{ years}$

**APPENDIX E (of the ~~Draft~~Final EA)**

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**COMMENT LETTERS ON THE NOTICE OF PREPARATION  
AND INITIAL STUDY AND RESPONSES TO THE  
COMMENT LETTERS**



COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN  
Chief Engineer and General Manager

May 25, 2007  
File No.: 31B-380.10B

Mr. James Koizumi  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765

Dear Mr. Koizumi:

**Comments on the Initial Study for Proposed Amended Rule 1110.2**

The Sanitation Districts of Los Angeles County (LACSD) are pleased to offer comments on the Initial Study (IS) and Notice of Preparation (NOP) of a draft Environmental Assessment (EA) for Proposed Amended Rule (PAR) 1110.2. The LACSD service area is approximately 800 square miles, and encompasses 78 cities and unincorporated territory within Los Angeles County. LACSD is responsible for wastewater collection and treatment for approximately 5.2 million people in Los Angeles County, as well as solid waste management for a major portion of the County. The facilities we operate include 11 wastewater treatment plants, 3 active landfills, and 3 inactive landfills. Reciprocating engines are an integral part of our operations to provide cost-effective sewage pumping, electrical generation, landfill/digester gas management, and protection of these resources during emergencies.

1-1

**1) Chapter 1: Project Objectives**

Page 1-3 states that the objective of the project is to partially implement the 2007 AQMP Control Measure MSC-01—Facility Modernization which requires retrofit or replacement of existing equipment with NOx Best Available Control Technology (BACT) “at the end of a predetermined life span.” Since PAR 1110.2 sets arbitrary dates for all existing engines to meet natural gas BACT without consideration of useful life or cost recovery, the IS should really present the proposed changes as an *alternative* to the AQMP proposed measure. One way for PAR 1110.2 to become consistent with Control Measure MSC-01 is to use the concept of “useful life” before requiring existing engines to be replaced or retrofitted to meet natural gas BACT.

**2) Chapter 1: Emissions Inventory**

Page 1-13 through 1-15 estimates the level of excess emissions from the entire engine database. This is a very general discussion that is not true for most biogas-fired engines. First,

1-2



Mr. James Koizumi, SCAQMD

-2-

May 25, 2007

biogas engines tend to be large engines and are exclusively lean burns (over 75% of biogas engines are 1000 bhp or larger, and 100% are lean burns, according to SCAQMD survey data). The inspection data gathered by SCAQMD (Table 1-6) indicate lean burn engines have a much higher rate of NOx and CO compliance than do rich burns. Second, because most landfill/digester gas engines are larger than 1000 bhp, they are more likely to have CEMS, and thus be in continuous compliance. When these facts are considered together, they suggest that biogas engines do not contribute significantly to the estimated excess emissions shown in Table 1-7 relative to natural gas engines. This point becomes more important, given the claim of the IS on Page 1-17, that emissions from biogas engines far exceed those of natural gas units. This statement may be true when comparing BACT emission limits, but the comparison is misleading when natural gas-fired engines in practice, particularly rich burns, have unfortunately demonstrated non-compliance and excess emissions. The Environmental Assessment should discuss these differences and more accurately report the data regarding biogas engines.

1-2  
(cont.)

**3) Chapter 1: Control Technology**

On Page 1-17 SCAQMD indicates that there have been recent developments in new technologies that may allow emissions from biogas-fired engines that are as low as natural gas engines. We are very concerned that SCAQMD is not providing a clear description of these developments, nor any proof that these technologies function in the long term. For example, the engine at the landfill in City of Industry is primarily a natural gas-fired engine, supplemented with a small percentage of landfill gas. The landfill gas that is combusted in this engine is from a very old landfill that is low in siloxanes and other contaminants that could damage catalyst. Therefore, this is not representative of an engine fueled by landfill gas that meets the definition of biogas proposed in PAR 1110.2.

Also used as an example is fuel treatment and catalytic reduction at the Brea Landfill. In this project, an oxidative catalyst is used in conjunction with a complex fuel treatment system to reduce levels of CO. The operator reports to us that the catalyst on this system cannot make a year of operation without being rotated out for clean-up. Additionally, the operator reports that outlet CO emissions that have been measured in source tests would not meet the proposed CO BACT levels. Since the unit does not have a CEMS, it is not clear what the continuous profile of CO emissions looks like. Clearly, not enough data is present to fully evaluate this system.

1-3

The NOxTech system installed on the landfill gas engine in Woodville, California has been a test case that shows promise, however, no long-term data has been developed that can be reviewed. Also, this process could require the use of natural gas as supplemental fuel that would produce additional emissions, and because it is a SNCR process, may produce unacceptable levels of ammonia slip. Once again, not enough data is available on this system to fully evaluate these issues.

SCAQMD cites landfills in Italy that use the CLAIR non-catalytic VOC/CO control devices. Once again, long-term CEMS data needs to be produced that demonstrates that the engines could meet the proposed BACT CO requirements, the types of fuel clean-up system needed, and the replacement schedule for the catalyst. The Bowerman Landfill in Orange County is the only facility in the country using this system. To date, they have not collected

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emission data on this system, so there is nothing to substantiate that the BACT CO limit could be met continuously. Also, this system is essentially a thermal oxidizer that needs heat input, such as natural gas or additional landfill gas. Any emissions from these supplemental fuels need to be evaluated. Finally, one would need to determine if this system is compatible with NOx reduction devices. Once again, it is premature to declare this technology a "success".

There is also an engine project in the Bay Area that proposes to use fuel cleanup coupled with CO/ NOx catalysts by Miratech; however, these engines are at least one year away from start-up. At least two years of data, or longer, should be collected before a valid conclusion can be reached on the process. A positive aspect of this project is that the BAAQMD recognizes the uncertainties of this project, and has established an operating threshold in the permit-to-construct on what constitutes success or failure of the catalyst. Unfortunately, our industry is at least three years away from finding out these answers.

We therefore recommend that the EA and final Staff Report include fuller details of the cited projects, as well as highlight existing uncertainties with the control technologies, particularly in terms of long-term feasibility and continuous compliance, not just source test compliance, with the proposed emission limits. It should also be discussed that all the projects cited above are new installations, so the suitability and economics of retrofitting these technologies to existing units need to be examined once all the emissions and cost data are collected and evaluated. The time lines of these projects indicate that we are at least three years away from having sufficient data to work with.

**4) Chapter 2: Environmental Checklist and Discussion**

Under "Construction" on Page 2-4, staff states that the possibility of replacing engines with flares will be examined in the Draft EIR. In addition, the EIR should examine the construction impacts of retrofitting existing engines with an advanced fuel treatment system, SCR and CO catalysts, and an ammonia storage and supply system. This level of retrofit could require extensive landfill gas piping re-configuration, building modifications, and stack relocations.

**5) Chapter 2: New Developments**

On Page 2-7 under "New Development", staff states that PAR 1110.2 would only require "minor modifications" to buildings or other structures. As stated above, retrofitting existing landfill/digester-fired gas engines with a fuel treatment system and SCR/CO catalyst could require extensive landfill gas piping re-configuration, building modifications, and stack relocations, all of which could be "major modifications."

**6) Chapter 2: Air Quality**

Part of the Air Quality assessment that begins on Page 2-8 should address the impacts the proposed project could have on California policies on renewable energy, the use of bioenergy and greenhouse gas reductions mandated by AB 32 and other state policies. Additional issues that should be addressed are the consequences of more natural gas usage for the NOxTech and

1-3  
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CL.AIR processes, associated ammonia slip emissions from both the NOxTech process and SCR catalysts, and further drain on the Priority Reserve credit bank. 1-7  
(cont.)

Further Construction emissions should be evaluated for the scenarios discussed in No. 4 and 5 above. Additional comments related to Air Quality are presented in items 7, 8, and 9 below. 1-8

**7) Chapter 2: Solid/Hazardous Waste**

Page 2-12 under Air Quality, Page 2-40 in Solid/Hazardous Waste, and Page 2-42 for Transportation/Traffic, all use an estimated catalyst life of three to five years. While this may be reasonable for natural gas applications, catalyst replacements on biogas engines will be much more frequent. Again, such applications are rare and none have a substantial track record; however, an estimated catalyst replacement frequency of 1 year or 8,000 hours of total operation is currently more reasonable for biogas units. This should be considered as added operating costs for biogas facilities, as well as for the associated increased ammonia emissions (i.e., resultant from degraded catalyst), increased solid/hazardous waste burden and disposal costs, and greater traffic, air pollution, and risk to public health related to frequent catalyst changes and removal. 1-9

**8) Chapter 2: Public Services**

Pages 2-36 and 2-37 address the comments from Association of California Water Agencies (ACWA), and conclude that there will not be any significant public service impacts. We caution against reaching this conclusion without further analysis. Remotely located water purveyors may not have grid power available at pumping facilities, and Diesel generators may not provide the runtime needed for major emergencies (i.e., on-site fuel storage cannot ensure service through wild fires that may last a week or more). In addition, retrofitting existing engines or installing costly CEMS will not make sense on low-use (but not emergency) units. Various water/wastewater/utility jurisdictions have different circumstances, but many have significant investments in gas engines and rely upon them for critical needs. Forcing essential public service agencies to shut down existing engines or look for other means to perform their function may ultimately benefit air quality, however, such actions may have reliability impacts on the public service infrastructure, increase facility health risks (due to new diesels), and will definitely increase the cost of public services, which will be passed on to the ratepayers. Therefore, we feel the EA should address the impacts on "Public Services" as potentially significant. 1-10

**9) Chapter 2: Transportation/Traffic**

Page 2-9 under Air Quality effects and Page 2-42 in the discussion for Transportation and Traffic mention the impact of additional source testing for engines. We disagree with the analysis using only "one additional test every six years." Since the current requirement is triennial, and the proposed amendment is for testing every two years or every 8760 operating hours—*whichever occurs first*, the EA should conservatively assume testing every 8760 hours, or annually. Increasing engine testing from once every 3 years to annually will notably increase 1-11



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workload for LAP-approved testing firms. The increase in contractor traffic and air pollution will likely not be significant, but should be evaluated in the EA. The real concern is that with the proposed restrictions in source testing, such as the ban against pre-tests and any servicing or tuning within 1 week, test cancellations and re-scheduling will increase. This will reduce the availability of test firms. The cancellations and extra demand will also increase source test costs.

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Similarly, Page 2-9 and Page 2-42 touch on the number of CEMS that will be installed as a result of PAR 1110.2. We assert that the currently proposed compliance schedule for new and modified CEMS is unrealistic and will exhaust the available local resources for the manufacture, assembly, integration, installation, and certification of CEMS. Such shortage and increased backlog will increase cost and time needed to achieve compliance. Again, this should be considered in PAR 1110.2, primarily for the compliance and cost aspects, and also the EA for short-term limited impacts on air quality and traffic. We propose extending the CEMS compliance deadlines and consider a tiered compliance schedule such as engines >1000 bhp installing CO CEMS one year earlier than smaller engines installing NOx/CO CEMS.

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We again thank you for this opportunity to comment on the Initial Study and NOP of the draft Environmental Assessment for PAR 1110.2. Please contact Frank Caponi or Tom C. Fang at (562) 699-7411 should you have any questions regarding these comments.

Sincerely,  
Stephen R. Maguin

*Gregory M. Adams*

Gregory M. Adams  
Assistant Departmental Engineer  
Air Quality Engineering Section  
Technical Services Department

GMA:FRC:TCF:ch

CC: Marty Kay, SCAQMD  
Laki Tisopoulos, SCAQMD

**Responses to Comment Letter #1**  
**County Sanitation Districts of Los Angeles County**  
**May 25, 2007**

**Response 1-1**

PAR 1110.2 is considered to implement the 2007 AQMP control measure MCS-01 in part, because it would require affected equipment to be retrofitted or replaced to comply with applicable BACT levels. Although MSC-01 does take into consideration useful life of the equipment, for ICEs affected by PAR 1110.2, useful life has not been precisely defined, especially for ICEs.

Engine replacement with a new engine is not required and may not result in complying with PAR 1110.2 since new engines, without the add-on control technology, are not necessarily cleaner than older engines. The current BACT limits for natural gas engines were established in 1994. These BACT limits would be incorporated into PAR 1110.2. Therefore, only natural gas engines installed before 1994 (i.e., at least 16 years old) would need to be retrofitted.

Even though SCAQMD staff has not verified the claim that commenters may replace ICEs with alternative control technologies, staff has committed to conduct a technology assessment in 2010 to evaluate whether or not cost-effective control technologies are available to allow compliance by biogas engines with the final emission compliance limits in the proposed amended rule, avoid the need for biogas flaring, and eliminate or minimize potential adverse impacts identified by the regulated industry. If the assessment shows a potential for flaring or that cost-effective control technology is not available for biogas engines, staff will return to the Governing Board with a proposal to address any new significant adverse impacts. Depending on the conclusion of the technology assessment, the emission concentration requirements of PAR 1110.2 may need to be modified.

In response to this comment, Alternative D in the Draft EA contains a useful life condition that would extend the requirements an additional two years for equipment that would be less than ten years old in 2010.

**Response 1-2**

As indicated in Chapter 3 of the Draft EA, the surveys and unannounced compliance testing indicates that lean-burn engines with CEMS tended to comply with applicable limits, while lean-burn engines without CEMS tended to violate their applicable limit, although the number of test was considered to be too small to be conclusive. For additional information refer to the section entitled "Unannounced Compliance Testing" in Chapter 3. Further, SCAQMD unannounced tests show that when they properly operated and maintained, natural gas engines have significantly lower emissions than biogas engines.

**Response 1-3**

Based on comments from stakeholders the proposed CO concentration in PAR 1110.2 has been raised from 70 ppm to 250 ppm. Further, in recognizing that additional data are needed for biogas engine control technologies SCAQMD staff are proposing to not submit the proposed

biogas emission limits to EPA as part of the SIP submittal for PAR 1110.2. In addition, PAR 1110.2 contains a provision to conduct a technology review in 2010 to assure that cost-effective control technologies are demonstrated and available prior to moving forward with the proposed limits.

**Response 1-4**

The Draft EA includes a comprehensive analysis of adverse construction impacts from retrofitting existing engines with add-on emissions control equipment and the removal of ICEs and the installation ICE alternatives such as turbines, biogas to LNG plants, etc. Since construction and operations would occur concurrently, peak daily construction and operational criteria pollutants were added together and compared to the operational criteria pollutant thresholds. The analysis and conclusion can be found in Chapter 4 of the Draft EA.

**Response 1-5**

With regard to the analysis of impacts from the various compliance options, refer to the Response to Comment 1-4.

**Response 1-6**

Before the future biogas emission limits go into effect, AQMD staff will conduct a technology assessment in 2010 to assure that feasible retrofit controls are available for biogas engines. This will prevent replacement of ICEs at biogas facilities with continuous flaring. It is unlikely that biogas facilities would replace ICEs with electrification only because biogas must be treated.

In the Draft EA, the worst-case scenario assumed that all ICEs at digester facilities are replaced with gas turbines or microturbines and all ICEs at landfill gas operations are replaced with biogas to LNG plants and would obtain electricity from the power grid. Gas turbines were chosen for digester gas facilities because they are the least efficient of the replacement options of boilers and fuel cells and most digester facilities do not have sufficient room to install biogas to LNG plants. It was assumed that all landfill gas operators would replace ICEs with biogas to LNG plants and would obtain electricity from the power grid, since this would not only remove the electricity provided to the grid, but would require that landfill gas facilities use energy from the grid. The details of this analysis and the conclusion with regard to PAR 1110.2's effect on energy and renewable energy policies in California can be found in the "Energy" section in Chapter 4 of the Draft EA.

Greenhouse gas impacts from implementing PAR 1110.2 are evaluated in the "Air Quality" section of Chapter 4 of the Draft EA. Staff has concluded that for some categories of ICEs, replacing ICEs with electric motors would cost less than complying with PAR 1110.2 for an estimated 225 existing non-biogas ICEs. SCAQMD staff assumed as a conservative analysis that operators of 169 existing non-biogas ICEs would replace their existing engines with electric motors. Based on this analysis, PAR 1110.2 would result in an overall CO<sub>2</sub> reduction from existing CO<sub>2</sub> emission levels from the replacement of existing non-biogas engines with electric motors.

**Response 1-7**

The NOxTech and CLAIR technologies are intended for use with biogas engines. They do not require any additional natural gas use because any supplemental heat required by these devices can be provided by biogas rather than natural gas.

NOxTech and SCR controls may have some ammonia slip emissions. It is not clear why PAR 1110.2 would affect Priority Reserve credits. Operators who choose to retrofit existing engines to comply with PAR 1110.2 would be reducing emissions and, therefore, would not be subject to offset requirements. Similarly, operators who replace existing ICEs with new engines would also be reducing emission and would also not be subject to offset requirements.

**Response 1-8**

With regard to construction emissions impacts, refer to Response to Comment 1-4.

**Response 1-9**

The proposed project assumes the use of biogas pretreatment. SCAQMD staff assumed that facility operators would use carbon adsorption to remove biogas impurities that would poison catalyst. The additional vehicle trips and cost for carbon adsorption were included in the Draft EA analysis. Because biogas pretreatment was included in the analysis, and based on available information, SCAQMD staff assumes that catalyst replacement would occur every three years.

**Response 1-10**

PAR 1110.2 does not require electrification of engines; however SCAQMD staff believes that facility operators may replace existing engines with electric motors which may be less costly than complying with PAR 1110.2 requirements.

Based on the current version of PAR 1110.2, which would require fewer CEMS than the original version of PAR 1110.2 circulated with the IS, SCAQMD staff has not identified any remote locations that would require a CEMS.

If a water agency operator wants to electrify an engine, and is concerned about a diesel engine providing adequate run time in an emergency, there are other compliance options. The existing natural gas engine and pump could be used as an emergency back-up to the electrical pump. Diesel engines can also be converted to run primarily on natural gas with a small amount of diesel fuel, which would significantly extend the run time of the engine.

A low usage exception from the CEMS requirement has also been added that addresses the commentor's concern about low-use units.

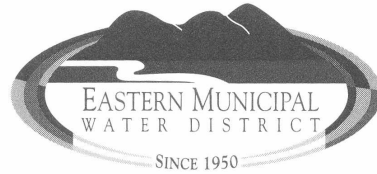
**Response 1-11**

It is possible that operators of engines without CEMS may need to conduct one or two additional tests every three years. However, staff estimates that the proposed new low-use exception (less than 2,000 hours between tests) would allow about 159 engines to remain on a once-in-every three-years schedule. Semi-annual source tests were assumed in the air quality, and transportation analyses in the IS and Draft EA.

SCAQMD staff does not understand how the prohibition of pre-tests and the limitations on pre-test maintenance will cause tests to be canceled and rescheduled. It is more likely that testing will be reduced, since operators would be prohibited from hiring a test contractor to do a pre-test, find that engine repairs are needed, and then reschedule the reported test for a later date. SCAQMD staff, therefore, agrees that the increase in contractor traffic will not be significant and, as a result, need not be analyzed further in the Draft EA.

**Response 1-12**

Staff has proposed a revised schedule so that CEMS would be installed in three phases over a three-year period. Also, the revised thresholds will reduce the number of engines requiring CEMS to about 83. Because of the timesharing and electrification possibilities, the number of actual CEMS systems could be as low as 24, further reducing potential traffic impacts.



May 25, 2007

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Mr. James Koizumi  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765

Dear Mr. Koizumi:

Eastern Municipal Water District (EMWD) appreciates the opportunity to comment on the Proposed Amended Rule (PAR) 1110.2 Draft Environmental Assessment (DEA). EMWD provides drinking water, fire flow, wastewater collection, treatment and reclamation services to a 555 square mile service area in western Riverside County including the communities of Moreno Valley, Perris, Hemet, San Jacinto, Menifee, Sun City, Murrieta, and Temecula and surrounding unincorporated areas. In support of EMWD's mission, EMWD operates approximately 70 ICEs ranging from 95 brake horsepower (bhp) to 1970 bhp. One of the primary reasons EMWD operates these engines is to ensure and maintain the reliability of our services, especially during catastrophic events such as fires, floods and earthquakes.

2-1

As noted above, reciprocating engines are an integral part of our operating philosophy given our continuous need to have reliable pumping and electrical power generation at all times. Engines are also an important means for the effective management and utilization of digester gas, a bi-product of the wastewater treatment processes, which EMWD views as a valuable resource of renewable energy. In addition, the State of California through its Climate Action Plan and AB32 has intended that renewable fuels be part of the solution for reducing the State's greenhouse gas carbon footprint. This fact should be considered by the South Coast Air Quality Management District (SCAQMD) as it formulates new requirements affecting the utilization of digester gas (and landfill gas) by ICEs.

The comments presented below identify the concerns that EMWD has concerning the Draft Environmental Assessment.

**Initial Study, Chapter 2 – Environmental Checklist, III. Air Quality**

While the DEA generally claims that the proposed amendments to Rule 1110.2 will not require the electrification or replacement of existing engines with other non-internal combustion type equipment (fuel cells, solar, etc.) or hinder the installation of new engines because the requirements are focused on additional

2-2

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compliance monitoring requirements and lowering of emission limits, it fails to note that these new requirements may push current engine operators (and those entities that might normally consider the use of internal combustion engines in new operations) to choose other alternative power (mechanical and/or electrical) strategies. These include the use of electric motor-driven equipment rather than engine-driven equipment. Because public water and wastewater agencies are providing essential public services (drinking water, fire flows, sewage collection and treatment, water reclamation, etc.) the vast majority of facilities must remain in service at all times, especially during disasters such as fires and earthquakes, both common threats in Southern California.

Currently, the use of engine-driven equipment has supported that reliability. However, the proposed requirements of this rule are so costly (capital and operations and maintenance) that it is likely that many existing and future engine operations will be converted to electric motors. In order to provide the same level of reliability that currently exists with the use of engines, operators will have to install diesel-fueled, engine-driven emergency electrical generators. The analysis that is included in this section, fails to evaluate the new emissions and the cancer health risk (chronic) that would be associated with these diesel-fueled generator engines (operation as opposed to construction emissions/risks). These emissions and added cancer burden should be evaluated.

2-2  
(cont.)

Additionally, the analysis includes statements noting the Landfill industry's comments that the added cost for installation of CEMS would make flaring of landfill gas an economic alternative to installing SCR and that that would be examined as part of the Draft Environmental Assessment, and if it were found to be probable, that the related construction emissions from replacing engines with flares would be analyzed. EMWD has several comments regarding this analysis.

Wastewater agencies (of which EMWD is one of) are likely to have the same issue. Wastewater processes naturally generate digester gas which is currently used as a fuel and combusted most often in internal combustion engines. The cost of CEMS and meeting proposed lower BACT limits for biogas engines will likely cause wastewater agencies to divert the digester gas to waste gas flares rather than incur costs that would be prohibitive when considered against the return on investment. Hence, the emissions from this same gas diversion at wastewater agencies should be considered as well. It should also be noted that not only may there be emissions related to construction for new flares but there will be the operating emissions from these flares as well. If gas diversion at either or both of these source categories (landfills and wastewater facilities) takes place, the flares will operate 24 hours per day, 365 days per year. Additionally, wastewater agencies will need reliability. Hence, new diesel-fueled, engine-driven emergency electrical generators will be installed to provide the necessary reliability of newly electrified processes. These additional construction and operating emissions and added cancer risk should also be evaluated as part of this analysis.

**Initial Study, Chapter 2 – Environmental Checklist, VI. Energy**

As noted in the above discussion, the proposed amendments to Rule 1110.2 will result in operators incurring substantial additional costs due to the capital acquisition and operating and maintenance costs associated with the increased monitoring (CEMS, portable analyzer monitoring, increase in emissions source testing frequency and number of load conditions

2-3

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tested, etc.) and the more stringent emissions limitations (BARCT to BACT and distributed generation). These added costs, especially when considered on small engines (those less than 1000 brake horsepower), will likely drive many engine operators to electrify. The analysis done for the impacts to energy do not account for this added electrical demand. The analysis should also account for the energy demand impacts that will be associated with any diversion of landfill and digester gas to flares that will also negatively impact energy demand. The diversion of digester gas to flares should also be analyzed along with landfill gas diversion with regard to the negative impact it will have upon the State's goals for renewable energy programs and how it will affect power and natural gas utility systems and local and/or regional energy supplies.

2-3  
(Cont.)

Another area discussed is the impact upon the demand for natural gas. The DEA discusses the impact that SCRs may have in reduced engine efficiency. This decreased efficiency will create a higher demand for natural gas consumption by these SCR outfitted engines. While many of the largest engines operating in the South Coast Air Basin are lean-burn engines (the type of engine that would require an SCR for NOx control), the majority of engines in the Basin are rich-burn engines requiring non-selective catalytic reduction (NSCR) to reduce pollutants. Existing BARCT engines would have to retrofit these systems with larger NSCR catalyst beds in order to attain the current proposed BACT limits. The DEA analysis should include any reduced engine efficiency that these engines may incur and any associated increase in fuel demand. Also, emissions control systems that may achieve the proposed emission limitation for distributed generation should be evaluated as well for any new demand on natural gas due to achieving these standards.

2-4

Under the section that discusses "Electricity Usage from Electric Motors" the analysis discusses the impacts from an estimated conversion of 22 two stroke engines to electric motors. The analysis then discusses the impact of one company's (Hanover Compressed Natural Gas Company) conversion of natural gas engines to electric motors. This analysis should include the impact from estimating how many other natural gas-fired engines will convert to electric motors as well as the impacts from the biogas engines converting (landfill and digester gas). In fact, since CEQA requires an analysis of all potential adverse effects flowing from the proposed rule, the analysis should determine the estimated impacts from a complete conversion of existing internal combustion engines less than 1000 bhp to electric motor-driven equipment.

2-5

**Initial Study, Chapter 2 – Environmental Checklist, XIV. Public Facilities**

In comments made by the Association of California Water Agencies (ACWA), ACWA suggested that PAR 1110.2 might take away the option to utilize engines from member agencies, thereby negatively impacting their ability to provide reliable services such as delivery of water for fire suppression. The SCAQMD's analysis provided in this section states that PAR 1110.2 would not require the removal of internal combustion engines, but would require some retrofits for monitoring and/or emission reductions. It further states that PAR 1110.2 would not interfere with a water agency's ability to supply water for fire fighting nor negatively impact fire fighting. While it is true that the proposed requirements do not specifically require the replacement of engines with electric motor-driven equipment, as noted above the significant costs associated with these requirements will push many engine operators to replace their existing engines with electric motors and likely cause new project proponents to shift to electric motors in place of engines. Hence, while not specifically requiring engine replacement, the proposed amendments will effectively have that end result. The DEA should evaluate and discuss the potential

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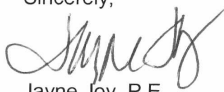
May 25, 2007

impacts, including the potential loss of public water supply system reliability (fire flows, drinking water, etc.). ACWA's issue was that if member agencies replaced all engine-driven equipment with electric motor-driven equipment, it would make them more susceptible to the kind of disasters that affected Arrowhead Manor Water Company (AMWC) that lost all ability to provide water supply for drinking and fire protection when the fire burned all power lines in the area supplying power to AMWC electrified facilities. EMWD feels that the SCAQMD's analysis is incomplete, especially when it identified water agencies within EMWD's service area that do not utilize engines yet obtain water from EMWD which does rely upon the use of engine-driven pumps to convey drinking and fire suppression water.

2-6  
(cont.)

EMWD sincerely appreciates this opportunity to comment on the PAR 1110.2 Draft Environmental Assessment. Should there be any questions or the need for additional information regarding these comments, please contact Mr. Edward Filadelfia at (951) 928-3777, extension 4318 or at [filadele@emwd.org](mailto:filadele@emwd.org). Thank you.

Sincerely,



Jayne Joy, P.E.  
Director, Environmental & Regulatory Compliance

JJ/tm

- Cc: Anthony Pack, General Manager
- Ravi Ravishanker, Deputy General Manager
- Michael Garner, Assistant General Manager, Resource Development
- Michael Luker, Assistant General Manager, Operations and Maintenance
- Curt Coleman, Attorney, Law Offices of Curtis L. Coleman
- Records Management
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**Responses to Comment Letter #2  
Eastern Municipal Water District  
May 25, 2007**

**Response 2-1**

See Response 1-6 regarding renewable energy and greenhouse gases.

**Response 2-2**

Adverse air quality impacts from diesel particulate exhaust from emergency generators are evaluated in the Draft EA. The use of emergency generators would generate additional criteria pollutants, but with the reductions from PAR 1110.2, the criteria pollutants from backup generators would be less than significant. Noncarcinogenic health risk from ammonia slip was evaluated in the Draft EA and found to be less than significant.

The carcinogenic and noncarcinogenic health risk from diesel exhaust particulate from emergency ICEs are evaluated in the Draft EA and determined to be significant.

See the analysis in the “Air Quality” section in Chapter 4 of this Draft EA for the details of this analysis.

With regard to the issue of biogas flaring, refer to Response to Comment 1-6.

**Response 2-3**

See Response to Comment 1-6 regarding the issue of biogas flaring and renewable energy.

PAR 1110.2 has been modified since the release of the NOP to include a low use exception. The low use exception that would ICEs from monitoring and emission control technology if engines are used less than 500 hours or 1,000 MMBtu annually, allowed for CEMS sharing. These changes should resolve the commenter’s concern about facility operators replacing existing ICEs with electric motors.

**Response 2-4**

Based upon information obtained from a leading catalyst supplier, catalysts designed to meet BACT limits do not cause additional pressure drop for the engine, so there would not be any efficiency impact as asserted by the commentor. As a result, reduced engine efficiency with an associated increase in demand for fuel is not expected to occur, and therefore is not analyzed further in the Draft EA.

**Response 2-5**

Because of revisions to PAR 1110.2, AQMD staff does not believe that two stroke engines would be electrified. Instead, operators would install oxidation catalysts.

See Response to Comment 2-3 regarding the addition of a low use exception.

See Response to Comment 1-6 regarding impacts from electrification.

**Response 2-6**

If a water agency decides to electify a natural gas engine water pump, there are several ways to address reliability during electrical outages. Either an emergency diesel generator can be installed, or the natural gas engine and pump can be retained as emergency backup. However, as indicated in Response to Comment #1-1, PAR 1110.0 has been modified to include a technology assessment by 2010 to assure that feasible retrofit controls are available for biogas engines. Based on the results of the technology assessment, PAR 1110.2 will be revised as necessary.

**APPENDIX F (of the Final EA)**

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**COMMENT LETTERS ON THE DRAFT  
ENVIRONMENTAL ASSESSMENT AND RESPONSES  
TO THE COMMENT LETTERS**



December 17, 2007

Mr. James Koizumi  
 South Coast Air Quality Management District  
 c/o CEQA  
 21865 Copley Drive  
 Diamond Bar, CA 91765-4182

Subject: Comments on Draft Environmental Assessment for Proposed Amended Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines (ICEs)

Dear Mr. Koizumi:

Bear Valley Electric Service (BVES) herewith submits its comments on the South Coast Air Quality Management District’s (SCAQMD) Draft Environmental Assessment (EA) on Proposed Amended Rule (PAR) 1110.2. This letter supplements BVES’ written comments to Mr. Marty Kay dated September 20, 2007, which are attached and herein incorporated by reference.

1-1

Comments on Draft EA for PAR 1110.2

BVES has two primary comments regarding the Draft EA and associated PAR 1110.2. The first is that the SCAQMD proposes to impose major and costly new requirements on facilities, including BVES’ Bear Valley Power Plant (BVPP), that do not fall within the scope of the SCAQMD’s stated Objective of the PAR 1110.2. The second is that the PAR requirements for additional CEMS equipment and inspections, monitoring and reporting activities will impose significant costs on BVES’ small customer base and service area, and will have adverse socio-economic effects on an already strained local economy.

1-2

Before we further discuss our two primary comments, BVES requests that the SCAQMD staff and Board review and address BVES’ previously submitted (attached) comments on the PAR 1110.2. The attached letter describes BVES’ Bear Valley Power Plant (BVPP) state-of-the-art design, emissions monitoring and controls, and emissions limits as set forth in the May 2007 Permits to Operate (PTOs for Facility ID No. 129033). BVES requests that the staff and Board consider that the PAR 1110.2 would add duplicative and costly equipment, systems and procedures that are already in place for the BVPP as specified through the BVPP PTOs.

1-3

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In addition to the above, the BVPP PTO emissions limits (NO<sub>x</sub> 7.3 ppm, CO 36 ppm, and VOC 11 ppm) are significantly more stringent than the PAR 1110.2 limits (NO<sub>x</sub> 11 ppm, CO 250 ppm and VOC 30 ppm). The SCAQMD-certified NO<sub>x</sub> CEMS system actively monitors emissions, BVES' operators check CO emissions frequently, the PTOs specify quarterly assessments and documentation of CO concentrations, and BVES voluntarily replaced older design air/fuel (A/F) ratio controllers with state of the art A/F ratio controllers. The SCAQMD PTO conditions, BVPP operator inspections and monitoring, and new A/F ratio controllers represent significant costs for operating this relatively small (8.4 MW) electrical generating plant that is used for meeting peak system loads, emergency power supply during Southern California Edison Company (SCE) transmission system outages of the radial lines supplying the high elevation service area, BVES' own distribution system outages, and overall voltage support during SCE system-wide peaking conditions.

1-4

BVES requests that the SCAQMD recognize that adding more layers of equipment and monitoring through the PAR 1110.2 will not substantially contribute to BVES' or the SCAQMD's mutual goals of ensuring compliance, but it will have substantial adverse impacts on BVES' small customer base due to the high capital and operating costs to comply with the PAR 1110.2 requirements that are redundant to the BVPP PTOs.

PAR 1110.2 Stated Objective Is Not Applicable to the BVPP

Page 2-2 of the Draft EA identifies the following as the Objective of the PAR 1110.2:

1. To implement facility modernization to achieve NO<sub>x</sub> emissions equivalent to BACT;
2. To achieve further VOC and CO emissions reductions based on the cleanest available technologies;
3. To increase engine compliance through improved monitoring, recordkeeping, and reporting;
4. To implement SB 1298 distributed generation emissions standards for new electrical generating engines; and,
5. To address issues identified by the Environmental Protection Agency so that 1110.2 can be approved for incorporation into the State Implementation Plan.

1-5

The requirements of the PAR 1110.2 should not apply to the BVPP because the BVPP already has equipment, systems, permit conditions, and monitoring, recordkeeping, and reporting procedures that meet or exceed those identified as the Objective of the PAR:

1. The NO<sub>x</sub> emissions limits specified in the BVPP PTOs are already much lower than SCAQMD-identified BACT for NO<sub>x</sub>;

2. The BVPP includes the cleanest available technology for controlling VOC and CO emissions, and the BVPP VOC and CO emissions limits are already much lower than the PAR 1110.2 limits;
3. The SCAQMD’s recently issued PTOs for the BVPP include monitoring, recordkeeping and reporting requirements that are comparable to the PAR 1110.2.; except for the new PAR CO CEMS requirement, the PAR would impose duplicative requirements for the BVPP and even CO monitoring and recordkeeping are already required through the PTOs;
4. The BVPP is an existing facility that does not fall under SB 1298; and,
5. The BVPP PTOs already address the EPA issues except for the frequency of source testing, which the EPA recommends at every two years.

1-5  
(cont.)

The BVPP is a newly constructed facility that overall utilizes the latest in power plant design and equipment. Considering the above point-by-point comparison to the PAR, it is clear that the BVPP already substantively complies with the Objective of the PAR, except for the increased frequency of source testing.

PAR 1110.2 Will Have Adverse Socio-Economic Impacts on BVES Customers

The capital and operational costs of the additional, duplicative requirements of PAR 1110.2 to BVES’ service area will be substantial. The addition of CO CEMS, duplicative monitoring, recordkeeping, and reporting on operations, and increased frequency and amount of source testing for the BVPP will have considerable initial and recurring cost impacts on BVES customer rates. The attached letter to Mr. Kay describes the anticipated costs just for the equipment installation of CO CEMS, which when combined with the costs of the other duplicative testing, monitoring, recordkeeping, and reporting provisions of the PAR, will cumulatively add to the socio-economic strain on the struggling economy in the Big Bear Valley. Increased electricity costs to the Big Bear area customers will adversely impact both seasonal and permanent residents, affordable housing, the cost of other public and private services in the Big Bear Valley, and cumulatively and negatively contribute to an already struggling community. As a result, BVES requests that the SCAQMD address the cumulative adverse impacts that would result to BVES’ service area.

1-6

Request for BVPP Exemption from New Requirements Under PAR 1110.2

The BVPP is operated to provide emergency and peaking power supplies that cannot otherwise be met due to the operation and capacity limitations on SCE transmission lines serving the BVES area. The BVPP profile does not match SCAQMD staff’s emphasis on electrical generation facilities that are mainly used for economic dispatch.

1-7

BVES therefore requests that the SCAQMD staff and Board exempt the BVPP from PAR 1110.2 because it already complies with the Objective, intent and substance of PAR 1110.2 and because of its non-economic basis for operations. To help ensure continued future compliance, BVES is willing to increase the frequency of its source

testing for NOx, CO and VOCs from the current three-year interval to every two years. This commitment could be instituted through some administrative action, or through the Board's decision-making on the PAR.

We appreciate your consideration of the above comments and look forward to your response. We also look forward to the staff's and Board's responses to BVES' request for exemption from PAR 1110.2.

1-7  
(cont.)

Sincerely,

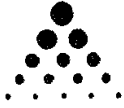


Tracey L. Drabant  
Energy Resource Manager

Attachment (Letter to M. Kay dated September 20, 2007)

cc: Marty Kay, South Coast Air Quality Management District  
Ken Markling, Bear Valley Electric Service  
Emil Schultz, Schulco LLC  
Dave Zamorano, Cornerstone Energy Services, Inc.  
Rick Lind, EN2 Resources, Inc.





**Bear Valley**  
Electric Service  
A Division of Golden State Water Company

**FILE**  
**RECEIVED**  
BY *ML* DATE *9/20/07*

September 20, 2007

Mr. Marty Kay  
South Coast Air Quality Management District  
Science and Technology Advancement  
21865 Copley Drive  
Diamond Bar, CA 91765

VIA FACSIMILE

Subject: Comments on South Coast AQMD Proposed Amendments to Rule 1110.2

Dear Mr. Kay:

Bear Valley Electric Service (BVES) appreciates the opportunity to provide its comments on the proposed amendments to Rule 1110.2 dated August 7, 2007. BVES owns and operates an 8.4 MW natural gas-fired electric generating plant (Bear Valley Power Plant or BVPP). BVES is a small electric utility that serves approximately 23,000 customers in and around the Big Bear Lake recreational area in the San Bernardino Mountains.

BVES has worked proactively with South Coast Air Quality Management District (AQMD) staff over the last few years to address and reach agreement on acceptable permit operating, monitoring and reporting conditions for the BVPP. Permits to Operate (PTOs) were issued by the AQMD in May 2007 that we believe establish an effective and reasonable emissions control and monitoring program for the BVPP.

However, in its comments, BVES wishes to relay to the AQMD that the proposed amended rule (PAR) for 1110.2 would substantially increase BVES' operating, monitoring and reporting conditions, and would have significant operational, management, cost and other impacts on BVES and its customers. The PAR would impose numerous new requirements on BVES that are far beyond those established by the recently issued PTOs. As described in the enclosed comments, BVES considers many of the PAR requirements to be unnecessary and redundant to existing conditions of the BVPP PTOs.

1-8

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Page 1 of 2

Before the amendments are finalized and the AQMD Board adopts an amended rule, BVES requests that the AQMD staff and Board carefully consider the burden of these additional requirements on facilities such as BVPP where emissions controls and plant operations already achieve the objectives that are intended by the PAR. BVES further requests that the AQMD specifically consider the marginal, if any, gain to emissions compliance that would be achieved at the BVPP versus the substantial costs and related impacts to BVES electric customers that would result from the PAR.

1-8  
(cont.)

Lastly, a continuing concern of BVES is that the AQMD developed the PAR based on a skewed test program of existing facilities. Only eleven lean-burn engines were tested, yet 180 rich-burn engines were tested, leading the AQMD staff to conclude the need for and prepare the PAR to require much more onerous changes for rich-burn engines. The AQMD staff emphasis on mandatory requirements for rich-burn engines, while exempting lean-burn engines from costly retrofits (e.g., CO CEMS), is not defensible given the disproportionate sampling of the facilities.

1-9

BVES looks forward to the opportunity of reviewing and commenting on the AQMD's California Environmental Quality Act document for the PAR. BVES requests that Ken Markling and I are included on all future public notices and documents regarding the PAR. A hard copy of these documents will follow by mail.

Sincerely,



Ken Markling  
Operations & Planning Manager  
For:  
Tracey L. Drabant  
Energy Resource Manager

Enclosure

- BVES Comments on the Proposed Amendments to Rule 1110.2
- BVES Comments on the Proposed Changes to the Portable Analyzer Protocol
- Oral Comments Presented by Ken Markling at the September 6, 2007 Workshop

Cc: Mr. James Koizumi, South Coast AQMD  
Ken Markling, Bear Valley Electric Service  
Emil Schultz, Schulco  
Dave Zamorano, Cornerstone Energy Services, Inc.  
Rick Lind, EN2 Resources, Inc.

**BEAR VALLEY ELECTRIC SERVICE (BVES) COMMENTS ON THE  
SOUTH COAST AQMD AUGUST 7, 2007 PROPOSED AMENDMENTS TO  
RULE 1110.2**

***BVES Comment 1*** – Section (e)(3)(A), which addresses Stationary Engine CEMS, indicates that the first CEMS summary report for the period ending June 30, 2008 shall be due on July 30, 2008. This would establish a 30-day time limit for the operator to poll data, prepare the report, perform QA/QC reviews, and then submit the semi-annual CEMS report to the AQMD. BVES’ experience is that 30 days is insufficient. Typically, BVES’ CEMS contractor takes 30 or more days to deliver its first draft report to BVES. *BVES requests that this provision be changed to no earlier than 60 days, and preferably 90 days.* Extending the submittal due date would also make it more consistent with the AQMD’s Annual Emissions Report due date.

1-10

***BVES Comment 2*** – Section (e)(3)(B) addresses time limits to modify existing or install new CEMS required by the PAR. For public agencies, it allows up to one additional year of time to install or modify CEMS on an existing engine. The additional one year allowance does not apply to private entities such as BVES, which would be subject to the much shorter time limits specified in Table VII. BVES’ recent experience is that CEMS contractors are in high demand, and are a relatively new sector of the consulting industry that is having difficulty being responsive to industry needs. *While BVES does not believe that it should be subject to additional CEMS requirements for CO as described in Comment 4 below, if the AQMD does not grant BVES relief from the CO CEMS requirement, then BVES and other private organizations should be afforded the same additional time that public agencies will be afforded.*

1-11

***BVES Comment 3*** – Section (e)(4) and (f)(1)(D) require the preparation, submittal and AQMD approval of a Stationary Engine Inspection and Monitoring (I&M) Plan that addresses acceptable ranges for engine and control equipment operating parameters. The parameters for the I&M Plan for rich-burn engines include: 1) engine load, 2) maximum deviation of the oxygen sensor set point, and 3) exhaust temperature at the catalyst inlet and temperature change across the catalyst. The I&M Plan is also to identify procedures for: a) diagnosing and notifying the operator (alarming) of engine control malfunctions, b) weekly or 150-operating hour checks of NOx and CO with a portable analyzer, c) daily monitoring, inspection and recordkeeping of: engine parameters, engine elapsed operating hours, hours since the last portable analyzer emissions check for NOx and CO, the deviation of the exhaust oxygen sensor voltage from the air-to-fuel ratio controller set point, and engine control system and air-to-fuel ratio controller faults and alarms that affect emissions, d) procedures and schedules for preventive and corrective maintenance, e) portable analyzer sampling to verify or re-establish the set point following oxygen sensor fault or replacement, f) procedures for reporting noncompliance to the Executive Director within one hour of a non-compliance event, g) procedures for recordkeeping required by the I&M Plan, and h) procedures for I&M Plan revisions and AQMD approval of such revisions prior to changes in emission limits or control equipment. Per the May 2007 AQMD Permits to Operate (PTOs) for its Bear Valley Power Plant

1-12

(BVPP), BVES is already required to inspect, monitor and report on the parameters described above. Because the PTOs already include these procedures that are specific to BVPP operations, *BVES does not believe that another type of I&M Plan should be imposed that would be redundant and costly. Instead, BVES requests that the AQMD accept what has already been required of BVES through the PTOs.* This could be accomplished by adding a provision to this subsection that waives the I&M Plan if acceptable ranges and procedures for inspection, monitoring, reporting and recordkeeping of engine and control equipment operating parameters are already established through a facility’s PTO or other AQMD approval.

1-12  
(cont.)

**Comment 4** – Section (f)(1)(A) would require the addition of seven CO CEMS to the BVPP. *As described in BVES’ Comments Presented orally at the September 6 AQMD Workshop (copy attached), BVES requests that it be exempt from CO CEMS.* The costs for equipment purchase, installation, testing, AQMD fees for certification, and other related costs would be greater than \$250,000 in the first year and over \$100,000 per year thereafter, which is in addition to similar costs already paid and now being paid annually by BVES for its NOx CEMS. The AQMD’s May 2007 PTOs for the BVPP already require portable analyzer CO monitoring and recordkeeping to make sure that the BVPP stays in compliance with CO emission limits, and the added costs for CO CEMS for each of the seven engines would be unnecessary and represent a significant increase in costs to BVES’ small customer base. An alternative would be for BVES to increase the frequency of its portable analyzer monitoring and recordkeeping in lieu of the CO CEMS. *BVES requests that the AQMD address the alternative of increased portable analyzer CO monitoring and record keeping in lieu of requiring CO CEMS at the BVPP.*

1-13

**Comment 5** – Section (f)(1)(A)(vi) establishes exceptions to Rule 218 CEMS requirements, including electronic storage of data in lieu of a strip chart recorder and conducting RATA on the same schedule as source testing. As worded, the provision pertains to “engines that are required to install a CEMS by clause (ii) of this subparagraph...”. *BVES requests that the same exceptions be established for existing CEMS as well as CEMS that may be required “...by clause (i) of this subparagraph.”*

1-14

**Comment 6** – Section (f)(1)(C)(i) proposes to increase the frequency of source testing from every three years to ...”every two years, or 8,760 operating hours, whichever occurs first.” A sentence is then added to the section that states ...“The source test frequency may be reduced to every three years if the engine has operated less than 2,000 hours since the last source test.” No rationale is presented for increasing the frequency of the source testing from 3 years to 2 years, or for the selection of 2,000 hours of operation. Further, no consideration is given for the many new testing, monitoring and reporting requirements of the PAR. If the AQMD threshold for source testing is changing to 8,760 hours, then the frequency should not change from 3 years to 2 years, but rather be expressed as ...”every 3 years or 8,760 operating hours, whichever occurs first.” *BVES therefore requests that the AQMD change this provision to require source testing based only on ...”every three years, or every 8,760 hours, whichever occurs first.”*

1-15

**Comment 7** – Section (f)(1)(D)(x) would waive the I&M Plan requirement if the facility is required to have a NOx and CO CEMS by the PAR, or if the permittee voluntarily has a NOx and CO CEMS that complies with the PAR. BVES was required to have, and has installed and operates, a NOx CEMS in accordance with AQMD permit to construct requirements. In the May 2007 AQMD PTOs, BVES is now required to regularly monitor and record CO as described under Comment 4. Because BVES has a NOx CEMS and because it already regularly monitors and records CO per the terms of the recently issued PTOs, *BVES requests that it be exempt from the I&M Plan requirements.* Comment 3 above provides further detail on the reasons that an I&M Plan would be unnecessary, costly, and redundant to procedures already required through the PTOs.

1-16

**Comment 8** – Section (f)(1)(F)(i) and subsequent paragraphs would require electric meter monitoring and CEMS recording for new, non-emergency electrical generating engines. The requirements appear to specifically pertain to facilities that are eligible for emissions credits for heat recovery. However, electrical meter information is not needed by the AQMD for facilities that do not claim emissions credits for heat recovery. *Therefore, Section (f)(1)(F) should be revised to be applicable only to ... "engines subject to the requirements of subparagraph (d)(1)(F)(ii) ...".*

1-17

**Comment 9** – Section (f)(1)(G) requires that portable analyzer tests only be conducted by persons who have completed ... "an appropriate District-approved training program in the operation of portable analyzers and has received a certification issued by the District." *BVES requests that a reasonable time allowance be specified within which operators are to have received the training and certificate.*

1-18

**Comment 10** – Section (f)(1)(H)(i) would require an operator to report any noncompliance with Rule 1110.2 or permit condition to the Executive Officer within one hour of the noncompliance or within one hour of the time the operator knew or reasonably should have known of its occurrence. BVES believes that this time limit is unreasonably short and could lead to miscommunication of information. The BVPP has seven engines that are operated intermittently. BVES often starts multiple engines, but its operators cannot simultaneously troubleshoot or investigate a noncompliant engine. If a noncompliant event occurs or is about to occur, the BVES operator shuts down the problem engine and starts another engine in its place. After the engines are running and the operator confirms that the plant is serving load, then the operator will return to the noncompliant engine at a later time to investigate the problem. For an operator to troubleshoot an engine, identify the equipment or other cause of the problem, and determine an estimated time for repairs often involves several hours and sometimes a day or more of investigation. *BVES therefore requests that the AQMD change the reporting time from one hour to one business day, which will help ensure that the operator provides complete and accurate information to the Executive Officer and AQMD staff.*

1-19

**Comment 11** – *BVES supports the proposed text addition to Section (h)(10), which specifies a start-up exemption limit of 30 minutes, ... "unless the Executive Officer approves a longer period for an engine and makes it a condition of the permit to operate."*

1-20

BVES COMMENTS ON SOUTH COAST AQMD PROPOSED CHANGES TO THE  
(PORTABLE ANALYZER) PROTOCOL FOR THE PERIODIC MONITORING OF  
NO<sub>x</sub>, CO, AND O<sub>2</sub> FROM STATIONARY ENGINES

BVES has reviewed the proposed protocol for portable analyzer monitoring. At this time, BVES requests that the AQMD defer adoption and provide a future opportunity to review and comment on the proposed revisions to the protocol for two reasons:

- 1) the protocol text is directly related to the requirements of Rule 1110.2, and until the AQMD finalizes the proposed amended rule for 1110.2, the text for the protocol cannot be presented for public comment.
- 2) the proposed forms for linearity and stability tests (Form 1), calibration recordkeeping (Form 2), and periodic monitoring recordkeeping (Form 3) are not included in the draft protocol for review and comment.

1-21

- Attachment to BVES Comments on PAR 1110.2 -

**ORAL COMMENTS SUBMITTED BY KEN MARKLING OF BVES AT THE  
SEPTEMBER 6, 2007 SOUTH COAST AQMD WORKSHOP**

**Opening:** Hello, I am representing Bear Valley Electric Service (BVES), a small electric utility that serves approximately 23,000 customers in and around the Big Bear Lake recreational area in the San Bernardino Mountains.

**Introduction:** Due mainly to limitations on the three transmission lines that deliver power to our mountaintop community, BVES needed to install its own generation equipment. As of January 2005, we now have seven, rich-burn internal combustion (Waukesha) natural-gas fired engines at our Bear Valley Power Plant (BVPP), for a total of 8.4 MW in capacity. BVES operates the BVPP for peaking power and emergency generation needed during outages caused by forest fires and winter weather.

BVES has a number of comments on the proposed rule, which we will submit in writing by the September 17 deadline. Today, however, BVES will comment on only two of the proposed changes, because if the PAR is implemented as proposed, it would significantly impact BVES' electric customers.

**Comment 1: The Proposed Requirement to Add CO CEMS Is Costly and Unwarranted**  
The AQMD proposes to require CO CEMS for rich-burn internal combustion engines only. BVES currently has NOx CEMS for each of its seven engines, and already has installed state-of-the-art air-fuel ratio controllers to maintain NOx levels per the AQMD's Permit to Operate (PTO) limits.

The capital cost for installing CO CEMS at the BVPP would be over \$100,000. The annual costs for operating, maintaining, testing and reporting to the AQMD would be comparable to the annual costs for NOx CEMS, which averages roughly \$70,000 per year. These capital and annual costs exclude BVES staff time for contracting, consulting, reviewing, and reporting to the AQMD which will, in turn, increase. It is estimated that the annual cost for retrofitting and operating CO CEMS equipment the first year would exceed \$200,000.

BVPP operators already sample and record CO levels during engine operation. The operators also perform quarterly CO sampling as required by the Permits to Operate (PTOs). Third party Source Emissions testing for CO is also performed every third year.

It is BVES' understanding that the BVPP has the most stringent CO emissions limits (36 ppm corrected) in the SCAQMD for ICEs, and BVES has not been cited for any CO violation. The AQMD already requires BVES to regularly monitor and document CO levels. BVES additionally self-tests for CO levels. The added burden of the capital and annual costs to BVES ratepayers for installing, maintaining, testing and reporting on a CO CEMS at the BVPP is unjustified. There would be no public benefit, but would

1-22

result in significant public cost to BVES' service area and, in turn, increased rate for its electric service customers.

**Comment 2: The Proposed Change in Frequency of Source Testing from Every Three Years to Every Two Years or 8,750 Hours, whichever Comes Sooner, Is Unnecessary**  
I described earlier the NOx and CO testing and reporting that we undertake at the BVPP. The existing NOx CEMS undergoes Relative Accuracy Test Audits (RATA) annually. The CO is sampled and recorded frequently. Increasing Source Testing from every 3 years to every 2 years would merely duplicate information that is already collected through other testing (e.g., annual NOx RATA) and monitoring (e.g., CO sampling) activities. This would only increase costs to BVES customers without providing new information.

1-23

**Summary:** Overall, as an electric utility providing a service vital to its customers, BVES has an obligation to provide service at a reasonable cost within the given regulatory framework. By unnecessarily increasing the regulatory cost to do business through costly, unjustified, and unwarranted rules, and without direct public benefit, the AQMD is not allowing BVES to meet its obligation to its customers as an electric utility.

1-24

Thank you for your consideration and the opportunity to address you today. I would like to provide you a copy of these oral comments to be followed by our written comments due on September 17.



**Responses to Comment Letter #1  
Bear Valley Electric Service  
December 18, 2007**

**Response 1-1**

SCAQMD staff strongly disagrees with the opinion expressed by the commenter that the requirements of PAR 1110.2 do not fall within the scope of the SCAQMD's stated Objective of PAR 1110.2 for the following reasons:

First, the commenter incorrectly states later in the comment letter that the objectives of PAR 1110.2 are not applicable to the commenter. The statement of objectives does apply to the objectives of the proposed project, in this case PAR 1110.2, not individual facilities that may be subject to PAR 1110.2. If the equipment operated by the commenter already complies with PAR 1110.2, then no further equipment modifications are necessary.

PAR 1110.2 partially implements 2007 AQMP Control Measure MSC-01 – Facility Modernization, which requires facilities not participating in the NO<sub>x</sub> Regional Clean Air Incentives Market (RECLAIM) Program to retrofit or replace existing equipment at the end of a predetermined life span to achieve NO<sub>x</sub> emissions equivalent to BACT. PAR 1110.2 would require affected facility operators to meet existing BACT standards for non-NO<sub>x</sub> RECLAIM facilities. In order to meet BACT standards some of the existing ICEs would need to retrofit or replace existing equipment. In addition to achieving NO<sub>x</sub> emission reductions, one of the objectives of PAR 1110.2 is to achieve further VOC and CO emission reductions for new and existing engines based on the cleanest available technologies.

PAR 1110.2 would also increase engine compliance through improved monitoring, recordkeeping and reporting. The additional monitoring, recordkeeping and reporting requirements are expected to eliminate the excess emissions found during unannounced source testing completed by SCAQMD enforcement staff. Additional CEMS, source testing and inspection and monitoring (I&M) would ensure that engines are operating correctly and emissions are below PAR 1110.2 requirements.

PAR 1110.2 would partially implement SB 1298 distributed generation emission standards for new electrical generating engines. The original staff proposal would have required affected engines to comply with CARB's distributed generation standards that, as of January 1, 2007, applied to equipment that does not require local district permits. The CARB standards are based on the emissions from large new central generating stations with BACT. Since large and small electrical generators are already required to meet these standards, the proposed standards would simply extend the same requirements to ICEs that require SCAQMD permits. Based on comments submitted by the Engine Manufacturers Association, staff raised the proposed limits, in lbs/MW-hr, from 0.10 to 0.20 for CO and from 0.02 to 0.10 for VOC. Therefore, one of the objectives was modified from implementing SB 1298 to partially implementing SB 1298.

Finally, a major objective of PAR 1110.2 is to address and correct issues identified by EPA relative to the existing version of Rule 1110.2, so it can be approved for incorporation into the SIP. EPA had five concerns with:

- Lack of an I&M plan similar to CARB' RACT/BARCT document. PAR 1110.2 includes and I&M plan.
- EPA requested that source testing every two years or 8,760 hours instead of every three years. PAR 1110.2 includes source testing every two years.
- Source testing at peak load as well as at under typical duty cycles.
- A removal, or further justification, of the exemptions for engines at ski resorts, the far eastern portion of Riverside County, and San Clemente Island.

Therefore, the objectives of PAR 1110.2 clearly reflect the scope and requirements of PAR 1110.2. Even though all objectives and requirements may not apply to Bear Valley Electric Service (BVES), they not preclude the need for other facilities to meet these objectives and requirements to ensure attainment of criteria pollutants in the SCAB.

### **Response 1-2**

Economic factors direct or indirect are not considered in the Draft or Final Environmental Assessment unless they cause adverse environmental impacts. CEQA Guidelines §15131(a) states that “economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by economic or social changes... The focus of the analysis shall be on the physical changes.” CEQA Guidelines §15131(b) states “economic or social effects of a project may be used to determine the significance of the physical changes cause by the project.” CEQA Guidelines §15131(c) states that “economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether change in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. CEQA statutes §§21100 and 21151 also state that significant effects are limited to physical conditions. No direct or indirect economic or social effects that could cause physical impacts to the environment were identified as a result of implementing PAR 1110.2.

Permit data indicates that BVES would need to install seven CO analyzers to its internal combustion engines in 2010, resulting in an average annual compliance cost of \$16,359, assuming a ten-year equipment life. It would not incur other costs. Therefore, the impact is minimal. Also, see Response 1-6.

### **Response 1-3**

Specific comments have been identified in the attachment to BVES' letter and responses have been prepared.

BVES operates seven rich-burn, 1,695-bhp engines that are currently required by Rule 1110.2 to have a CEMS for NO<sub>x</sub>. Prior to 1997, Rule 1110.2 also required a CO monitor for such engines. Because SCAQMD testing has found that 28 percent of rich-burn engines tested are in violation of CO emission limits, SCAQMD has proposed to reinstate the requirements for continuous monitoring of CO, in addition to NO<sub>x</sub>, for large engines. BVES' permits only require a quarterly test for CO, which is not as effective in ensuring compliance as continuous monitoring. BVES'

currently permitted CO emission limit is 36 ppm, which is much more stringent than the proposed 250 ppm emission limit in Rule 1110.2, so ensuring compliance with this lower limit through continuous monitoring is much more critical.

**Response 1-4**

Since BVES already has a NO<sub>x</sub> CEMS, the cost of adding a CO monitor to the system is relatively small. BVES can pass on the costs to its customers. Further, BVES' equipment already complies with emission limits in PAR 1110.2, so no additional emission control equipment will be required. As a result no further cost will be incurred to purchase, install or maintain emission control equipment. BVES did not provide any specific analysis to show there are "...substantial adverse impacts on BVES' small customer base..." However, SCAQMD staff believes that when the compliance cost is amortized over the life of the equipment, the impacts to the ratepayers should be minimal.

**Response 1-5**

The emissions limits specified in the BVES permits to operate are already lower than the emission limits of PAR 1110.2. As a result, equipment at the BVES facility already meet most of the objectives of PAR 1110.2 except for the enhanced compliance through improved monitoring, recordkeeping, and reporting. See Response 1-3.

**Response 1-6**

BVES states that PAR 1110.2 requirements would increase electricity cost to customers, which would adversely impact seasonal and permanent residents, affordable housing, the cost of other public and private services and cumulatively and negatively contribute to an already struggling community. BVES did not provide sufficient information on the expected costs incurred to be able to evaluate the assertions that PAR 1110.2 would adversely affect the economy of Big Bear Valley.

Please see the Response 1-2. Data on total electricity generated by BVES is not publicly available so it is not possible to calculate the additional rate impact from compliance costs associated with the proposed amendments. However, given that Bear Valley Electric Service (BVES) serves about 17,500 residential customers and 2,500 commercial, industrial, and government customers, the impact of the \$16,359 annual cost, assuming a ten-year equipment life, on its customers is not expected to be significant.

**Response 1-7**

Please see Response 1-3, which explains why improved CO monitoring is necessary. BVES offers to source test every two years. BVES is already required by Rule 218 to test at least annually for NO<sub>x</sub> CEMS certification. PAR 1110.2 will add CO to that requirement. If the engines are used primarily for "emergency and peaking power", they may not have to source test annually for VOC. PAR 1110.2 requires testing every two years or 8,760 hours, whichever occurs first. If the engines operate less than 2000 hours between source tests, the VOC test can be once every three years. SCAQMD rules do not typically exempt individual facilities. Generally, rules apply to specified equipment across the board as a measure of fairness and to enhance inspectors' abilities to enforce rule requirements for similar types of equipment.

**Response 1-8**

The September 20, 2007 fax from BVES was submitted to the SCAQMD prior to the release of the Draft EA on October 30, 2007; therefore, does not contain comments on the environmental analysis in the draft EA. Instead, the comments in this letter focus only on PAR 1110.2 provisions. In spite of this, specific comments have been identified and responses prepared for each comment. See previous responses 1-1, 1-3, 1-4 and 1-7.

**Response 1-9**

There is a sound technical basis for having different CO monitoring requirements for lean-burn engines. Because of the high levels of excess air with lean-burn engines, they inherently have much lower and more stable CO emissions than rich-burn engines. AQMD testing confirmed this. With regard to rich-burn engines, see Response 1-3.

**Response 1-10**

Rule 218 already requires CEMS reports within 30 days of the end of the six-month period.

**Response 1-11**

Giving public agencies an additional year to comply with the CEMS requirements actually addresses BVES' concern about the availability of CEMS contractors by stretching out the process over a three-year period, instead of a two-year period. BVES is not a public agency and can move faster than a public agency. With regard to financing and hiring contractors, public agencies are typically required to go through lengthy request for proposal processes, which can add substantial time to the contractor selection and hiring process.

**Response 1-12**

Pursuant to (f)(1)(D)(x) of the PAR, BVES will not be subject to the Inspection and Monitoring (I&M) plan requirements of the PAR because BVES will have NO<sub>x</sub> and CO CEMS. BVES should apply for a change of permit conditions to remove the parameter monitoring and quarterly CO testing on the current permit once the CO monitor is added to the current CEMS.

**Response 1-13**

See previous responses 1-1, 1-3 and 1-4. With regard to cost impacts, see Responses 1-2 and 1-6.

**Response 1-14**

Those exceptions to Rule 218 are intended only for smaller engines under 1,000 bhp that will be required to install a new CEMS. BVES' NO<sub>x</sub> CEMS already complies with Rule 218 as is.

**Response 1-15**

Both CARB and EPA require source testing at least every two years, but they have consented to the 2,000-hour exception. The source testing frequency provision is a necessary requirement for approval by EPA to incorporate the rule into the SIP. Incorporating a rule into the SIP is necessary to allow SCAQMD to take credit for anticipated emission reductions and for required attainment demonstration.

**Response 1-16**

BVES is exempt from I&M plan requirements, but please see previous responses 1-1, 1-3 and 1-4 regarding the need for continuous CO monitoring.

**Response 1-17**

Subparagraph (f)(1)(F) does not apply to BVES' engines, New electrical generating engines that are subject to this provision will be required to install electric meters in order to be able to determine emissions in pounds per megawatt-hour of electricity produced. As a result, the requested changes are not appropriate.

**Response 1-18**

BVES will not be required to have portable analyzer training because it will not be subject to I&M plan requirements. Other facilities subject to the portable analyzer training would have up to ten months after the adoption of PAR 1110.2 to complete the training, since that is when I&M plans are to be implemented.

**Response 1-19**

SCAQMD has revised the PAR 1110.2 reporting requirements substantially. Rule 430, however, currently requires breakdowns to be reported within one hour. If an operator doesn't know the exact cause of non-compliance or expected time for repairs within one hour, the operator does not have to include this information in the breakdown report. For excess emissions detected by a CEMS that are not caused by a breakdown, Rule 218 currently requires a report within 24 hours or the next working day. Other problems may be reported quarterly.

**Response 1-20**

SCAQMD understands that BVES supports the current proposal in paragraph (h)(10).

**Response 1-21**

BVES will not be subject to the portable analyzer protocol requirements because it will have a NOx and CO CEMS. The forms attached to the protocol have been on SCAQMD's website since November 2007.

**Response 1-22**

See previous responses 1-1, 1-3 and 1-4.

**Response 1-23**

See previous responses 1-7 and 1-15.

**Response 1-24**

Improved monitoring, testing and reporting in the PAR will improve engine compliance, reduce emissions, and benefit the customers of BVES, as well as all residents within the SCAQMD jurisdiction. Also, see Responses 1-2 and 1-6 regarding costs to do business.