

TO: California Air Resources Board
Attention: Karen Magliano

DATE: 8/30/2019

SUBJECT: Nomination of the Community of Portside Environmental Justice Neighborhoods

OVERVIEW:

This letter is to officially request the California Air Resources Board (CARB) select the Community of Portside Environmental Justice Neighborhoods (Portside Community) for a Community Emissions Reduction Program (CERP). The Portside Community which consists of the neighborhoods of Sherman Heights, Logan Heights, Barrion Logan, and W. National City was selected as a Monitoring Community in 2018 and is ready for selection as a CERP community. Since its selection as a Monitoring Community, the Portside Community in collaboration with District staff has taken several steps to further understand the sources of air pollution impacting the community, including the collection of new air quality and emissions data from mobile monitoring and community-level on-road traffic surveys. The steering committee and District are actively discussing how to spend incentive emission reduction funds to reduce emissions in the community and steering committee meetings have included presentations by experts on the availability of clean technology and emission reduction efforts at the Port of San Diego. The community has essentially already been involved with emission reductions, so let's make it official.

The Community is well positioned to be selected for a CERP as highlighted below:

- The community is already selected as a monitoring community
- The community has a need for emission reductions
- The community has an established steering committee
- The community has an established monitoring plan
- The steering committee is in support of the community being identified as a CERP-community
- There is new air monitoring data showing elevated PM-2.5 and diesel particulate and the need for an immediate CERP

The CARB blueprint document states that priority will be given to communities identified for monitoring. The Portside Community has this designation but also should be prioritized for its commitment and need for emission reductions.

Steering Committee

One of the requirements for community emission reduction program is the development of community partnerships and public engagement through in part with a community steering

committee. The District has already accomplished this by forming a 26-member committee consisting of a diverse group of stakeholders as shown below:

1	Ashley Rosa-Tiemanti	City of San Diego
alt	Chisti Dadachanji	City of San Diego
2	Jack Monger	Industry (IEA)
alt	Massie Hatch	Industry (Hatch Consulting)
3	Sara Giobbi	Industry (NASSCO)
alt	Dennis DuBard	Industry (NASSCO)
4	Larry Hofreiter	Port of San Diego
5	Elisa Arias	SANDAG
alt	Keri Robinson	SANDAG
6	Joy Williams	Other Agencies (EHC)
alt	Diane Takvorian	Other Agencies (EHC)
7	Roman Partida-Lopez	Other Agencies (The Greenlining Institute)
8	Dr. Shaila Serpas, M.D.	Medical Expert
alt	Dr. Stephanie Yoon, M.D.	Medical Expert
9	Jose I. Marquez-Chavez	Other Agencies (Caltrans)
alt	Kenneth Johansson	Other Agencies (Caltrans)
10	AC Dumauual	NAVY
alt	Frank Williamson	NAVY
11	Cory Illeman	SDG&E
alt	Joseph Gabaldon	SDG&E
12	Raymundo Pe	Other Agencies (City of National City)
13	Salvador Abrica	Union Representative
14	Philomena Marino	Community Resident
15	Sandy Naranjo	Community Resident
16	Ted Godshalk	Community Resident
17	Hilary Medina	Community Resident
18	Alicia Sanchez	Community Resident
19	Margarita Moreno	Community Resident
20	Irma Ortiz	Community Resident
21	Jiapsi Gomez	Community Resident
22	Olympia Andrade Beltran	Community Resident
23	Norene Riveroll	Community Resident
24	Vanessa Contreras	Community Resident
25	Mike Clapp	Community Resident
26	Andrea Lopez-Villafana	Community Resident

The committee has been very active in the implementation of AB 617 and the process of developing and implementing a monitoring program has been very collaborative. The committee is in support of CERP implementation as evidenced by their vote at the August 27,

2019 steering committee meetings. The steering committee has an established charter that memorializes the committee objectives, roles, responsibilities, meeting times and dates, facilitation services, and interpretation services. The steering committee has established monthly meetings that occur in evenings at Perkins Elementary located in Barrio Logan. To date there have been ten monthly meetings. Spanish translation services are provided, the principles of the Brown Act are followed, and presentation materials are translated to Spanish in advance of the meetings. District staff have facilitated the meetings, but they do not lead them which is done by the steering committee. For example, if the committee wants to spend all night on one agenda topic then it will. The District is working on acquiring a third-party professional facilitator with the goal of increasing engagement. In terms of diverse public participation and collaboration, the community is already prepared to be successful with a CERP.

Community meetings will continue with the existing steering committee. The steering committee will provide the District input on how meetings should be scheduled, and whether the monitoring and community emission reduction topics should be at a separate time or the same time.

Air Pollution Control Board (APCB) Hearing

District staff will present the proposed CERP plan at an APCB hearing to allow board members and the public an opportunity to provide comments and recommendations to the plan.

District Leads

As shown below the District has established leads for each of the components of AB 617 implementation and contacts will be updated as needed:

ROLE	DISTRICT STAFF
Community Liaison (<i>Lead</i>)	Jon Adams (858) 586-2653 jon.adams@sdcounty.ca.gov
Community Liaison (<i>Backup</i>)	Rob Reider (858) 586-2640 robert.reider@sdcounty.ca.gov
Monitoring (<i>Lead</i>)	Bill Brick (858) 586-2770 bill.brick@sdcounty.ca.gov
Monitoring (<i>Backup</i>)	David Shina (858) 586-2768 david.shina@sdcounty.ca.gov
Technical Assistance; Source Attribution, Emission Reporting (<i>Lead</i>)	Jim Swaney (858) 586-2715 jim.swaney@sdcounty.ca.gov
Technical Assistance; Source Attribution (<i>Backup</i>)	Allison Weller (858) 586-2703 allison.weller@sdcounty.ca.gov

ROLE	DISTRICT STAFF
Monitoring “AQ-View” Data Portal (<i>Lead</i>)	Aidan Hanley (858) 586-2610 aidan.hanley@sdcounty.ca.gov
Monitoring “AQ-View” Data Portal (<i>Backup</i>)	Adam Canter (858) 586-2771 adam.canter@sdcounty.ca.gov
Enforcement (<i>Lead</i>)	Mahiany Luther (858) 586-2653 mahiany.luther@sdcounty.ca.gov
Enforcement (<i>Backup</i>)	William Jacques (858) 586-2671 william.jacques@sdcounty.ca.gov
Incentives – Community Air, Grants, Environmental Justice (<i>Lead</i>)	Kathy Keehan (858) 586-2726 kathleen.keehan@sdcounty.ca.gov

Dedicated Webpage for AB 617

As shown below the District has a dedicated webpage for AB 617:

<https://www.sandiegocounty.gov/content/sdc/apcd/en/community-air-protection-program--ab-617-.html>

Need for Emission Reductions

The link to the document below details the need for emission reductions in the Portside Community:

https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/AB_617/San%20Diego%20County%20APCD%20Community%20Monitoring%20Submittal%207%2031%2018.pdf

Monitoring Plan

The steering committee and the District are concerned about the risk from fine particulates (PM-2.5), elemental carbon (diesel particulate), toxics metals, and toxic volatile organic compounds (VOCs). The steering committee and the District have developed a monitoring plan that includes the types of analytical equipment necessary to accurately measure these pollutants and locations in the community where to site this equipment. The monitoring plan is a dynamic document that will be updated as changes are deemed necessary by the committee and the District. The monitoring plan and can be found on the District website at:

https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/AB_617/AB-617%20Elements%20and%20Required%20Criteria_San%20Diego_June%202019.pdf

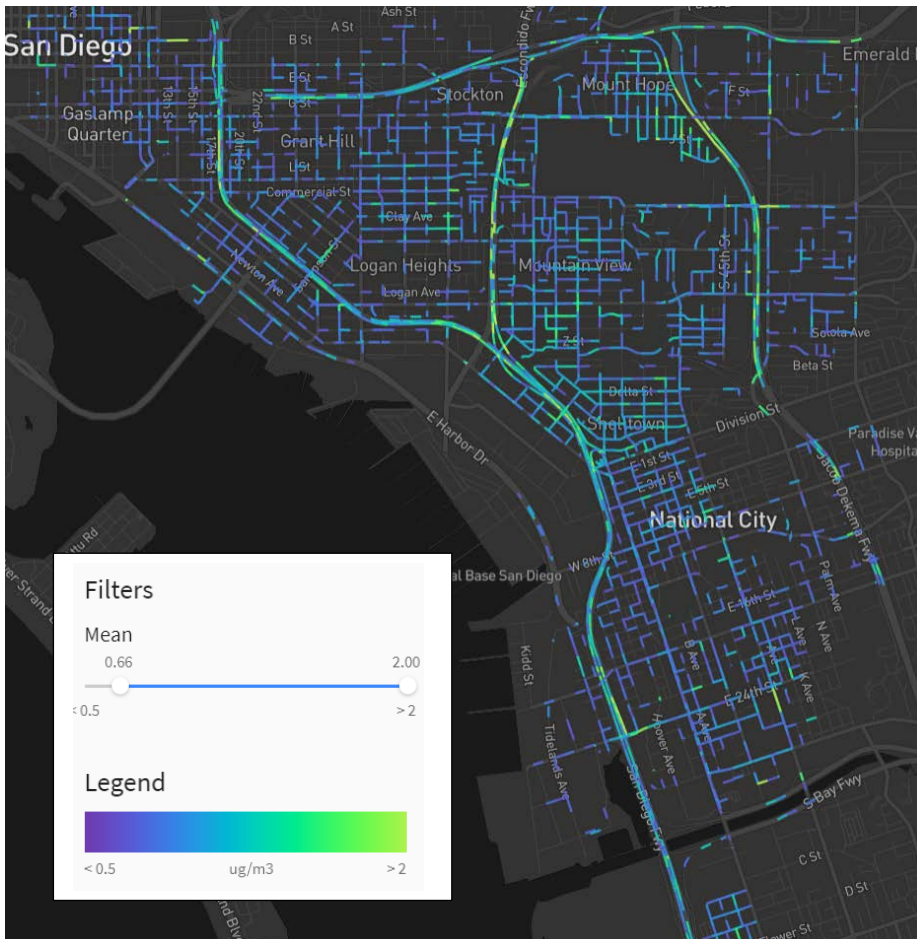
The District is actively implementing the plan and provides updates at the monthly steering committee meetings.

New Monitoring Data Results

The steering committee approved the hiring of a third party contractor to conduct mobile monitoring in County disadvantaged census tracts. The District hired Aclima Inc. to conduct such monitoring which concluded in June 2019. The results provide high-resolution air monitoring data at the community level and show elevated PM-2.5 (mean values above federal annual standard) and black carbon (mean values above state and local ambient levels) in areas in the Portside community. The results indicate that emission reductions from combustion sources (mobile, stationary) would benefit the community.

The District in coordination with CARB videoed license plates at twelve intersections from June 10, 2019 until August 2, 2019. The images will be run through ALPR software in September to obtain a better understanding of the contribution of mobile source emissions in the community. Field observations have already shown there is a larger concentration of diesel trucks in the central and southern portion of the community which will lead to an adjustment in PM-2.5, black carbon, and ion testing locations in the community.

Below is a snapshot of a map showing black carbon values:



Actions Under Way Supporting Selection as a CERP Community

Inspection Program

The District follows a dual path of inspection and compliance assistance that leads to compliance with regulations and the resulting minimizing of emissions. Compliance assistance and training is a proactive way of reducing emissions by educating facilities and equipment operators on how to comply and the importance of compliance. This method prevents excess emissions from occurring in the first place. Enforcement is necessary, however, when compliance assistance/training don't work. To this end, the District follows both paths that result in a robust compliance program. For stationary sources we are seeing a 93% compliance rate in the Portside Community and are striving to improve that figure.

An example of the compliance assistance training is our third annual training for the US Navy and their contactors who have a significant presence in the Portside Community. The three-day training includes explanation of our regulation, compliance inspection tips, and how to complete a permit application. Below are some inspection statistics:

Stationary Source Inspection Data				
Inspections -San Diego County	2016	2017	2018	2019
Stationary Source Inspections	7720	8691	8687	4437
Asbestos Inspections	690	661	1140	819
Air Quality Complaint Inspections	824	920	1022	556
Portable Equipment Registration Program (PERP) Inspections	461	617	769	401
Stationary Source Inspections (Zip Codes 92113, 91950, 92102)	2016	2017	2018	2019
Stationary Source Inspections	563	477	553	389
Asbestos Inspections	32	30	43	26
Air Quality Complaint Inspections	37	68	62	37
PERP Inspections	18	21	24	10
Stationary Source Notices of Violations (NOVs)				
Number of NOVs Issued- San Diego County	884	1015	953	631
Number of NOVs Issued (Zip Codes 92113, 91950, 92102)	52	54	64	39
Stationary Source Compliance Rate				
Non-Compliance Rate-San Diego County	9%	9%	8%	10%
Non-Compliance Rate-(Zip Codes 92113, 91950, 92102)	8%	9%	9%	8%
Types of Stationary Source NOVs Issued (Zip Codes 92113, 91950, 92102)				
Number of NOVs Related to recordkeeping	14	19	19	10
Number of NOVs for Operating without APCD Permit	8	4	6	8
Number of NOVs Related to Coating Operations	8	6	5	9
Number of NOVs Related to Gasoline Bulk Terminals	8	12	7	2
Number of NOVs Related to Engines	2	2	4	1
Number of NOVs Related to Gas Stations	11	6	10	5
Number of NOVs Related to Asbestos	0	0	5	0
Number of NOVs Other NOVs	1	5	8	4

Mobile Source Inspection Data

Number of Inspections (Vehicles Inspected)	2017	2018	2019
Mobile (County-wide)	3,754	5,246	2,775
***On-Road	787	1,006	667
Off-Road	2,967	4,240	2,108

Calendar Year (Citations)	Idling Citations	State Truck and Bus Citations	TRU	Off-Road	** HD VIP	Emission Control Label	Drayage Truck
2017	6	118	61	562	29	24	2
2018	1	58	91	545	18	11	0
*2019	3	60	60	177	42	30	0

*2019 includes Jan June
 **HDVIP = Emission control tampering and smoke opacity violations
 ***On-road includes transportable refrigeration Unit (TRU) inspections
 Settled by District

As the data shows above the District has a robust enforcement program and has a database system to track progress and areas of concern that need increased oversight.

Additional Actions Supporting Selection as a CERP Community

Emission Reductions Through Incentive Funding

For the first year (2017-18) of CAPP incentive funding, we have \$2,812,500 available to spend on projects. Of that funding, we have contracted \$2,211,529 for portside projects. The investments in Portside, when completed, will reduce an estimated 6.4 tons of NOx, 0.11 tons of ROG, and 0.48 tons of PM annually.

The District will continue prioritizing emission reductions in the Portside Community. Increased outreach has been occurring to advertise and generate interest in the 2018-19 CAPP incentive funding, highlighted by an August 7th press conference where County Air Pollution Control Board members Nathan Fletcher and Greg Cox promoted the availability and importance of emission reductions in disadvantaged areas.

Potential Regulation Revisions that will reduce emissions in the community

Upcoming Workshops/Public Notices

Rule Description	Public Workshop Date
Rule 69.4.1 -Stationary Reciprocating Internal Combustion Engines- BARCT	16-Aug-19
Rule 69.4 - Stationary Reciprocating Internal Combustion Engines-RACT (Repeal Rule, and be replaced by 69.4.1)	16-Aug-19
Rule 1210 - Toxic Air Contaminant Public Health Risks- Public Notification & Risk Reduction and Related Rule 19.3- Emission Information	15-Aug-19
Rule 69.2.1 - Small Boilers, Process Heaters and Steam Generators and Large Water Heaters	27-Sept-19
Rule 69.2.2 - Medium Boilers, Process Heaters, and Steam Generators	27-Sept-19
Rule 1206 - Asbestos Renovation and Demolition	Late 2019/Early 2020

With Rules 1210 and 19.3, the District is looking into lowering the cancer threshold that requires risk reduction from 100-in-one million to a lower value. The District is to report back to the APCB in March 2020. Four of the ten known facilities with a cancer risk greater than 10-in-one million are located in the Portside Community.

The proposed revision to the asbestos regulation will include private residences. Many of the private residences in the Portside Community were built several years ago when asbestos (a known carcinogen) use in the home construction was prevalent. By regulating remodeling and demolition activities of private residences in the Portside Community, asbestos exposure will be significantly reduced.

The engine and boiler rule revisions currently under development will bring further emission reductions in the community.

Rule 69.2.1 – Small Boilers, Process Heaters, Steam Generators, and Large Water Heaters

- Adopted in 2009, current Rule 69.2.1 is a point-of-sale rule that applies to units with a heat input rating from 600,000 Btu per hour to 2 million Btu per hour.
- The proposed amendments to Rule 69.2.1 will:
 - Lower the applicability threshold to a heat input rating of 75,000 Btu/hr.
 - Lower the NOx limit to 20 ppm (gaseous) and 30 ppm (liquid) for new and replacement equipment.
- The proposed amendments will apply to approximately 12,300 existing units.
- An estimated emissions reduction countywide of 235 tons of NOx per year is anticipated once the existing units reach their end of useful life and are replaced with new equipment. Emissions reductions of 6.7 tons of NOx per year are estimated in the Portside Community.

Rule 69.2.2 - Medium Boilers, Process Heaters and Steam Generators

- Proposed new Rule 69.2.2 is a point-of-sale rule that:
- Applies to units with a heat input rating greater than 2 MM BTU/hr to less than 5 MM BTU/hr.
- Applies to manufacturers, and new, existing, or relocated units.
- The new rule will require:
 - New equipment sold for use in San Diego are to be certified to comply with NO_x limits of 30 ppm (gaseous) and 40 ppm (liquid).
 - Registration of new, existing, or relocated units
 - Annual tune-ups of new, existing, or relocated units
- The new rule will apply to approximately 900 existing units.
- An estimated emissions reduction countywide of 194 tons of NO_x per year is anticipated once the existing units reach their end of useful life and are replaced with new equipment. Emissions reductions of 3.7 tons of NO_x per year are estimated in the Portside Community.

Rule 69.4.1 - Stationary Reciprocating Internal Combustion Engines:

- Adopted in 2000, the rule applies to engines with a manufacturer's output rating of 50 brake horsepower or greater.
- The amendments are proposed to update the rule for consistency with state and federal regulations, and other air district rules.
- The proposed amendments will specify lower emission standards for the following new or replacement engine categories:
 - prime gaseous-fueled
 - prime diesel-fueled (Tier 4 final certified)
 - emergency standby gaseous-fueled
 - emergency standby diesel-fueled (Tier 2 or Tier 3 certified).
- Other amendments will:
 - Require CEMS for new engines rated at 1,000 bhp or more and operating 2,000 hours/yr or more.
 - For prime gaseous-fueled engines, require the use of a portable analyzer to verify compliance with the emission standards during a quarter a source test is not performed.
- The proposed amendments will apply to approximately 3,300 existing non-emergency and emergency engines.
- An estimated emissions reduction of 305 tons of NO_x per year is anticipated once the existing units reach their end of useful life and are replaced with new equipment. Emissions reductions of 4.8 tons of NO_x per year are estimated in the Portside Community.

Strategizing with Land Use Agencies

The steering committee and District are well positioned to support emission reductions through land use improvements. The main land use agencies with jurisdiction in the Portside Community are the City of San Diego, Port of San Diego, SANDAG, and Caltrans. Each of these agencies have a seat on the steering committee. Recently the City of San Diego passed a regulation that prohibits truck traffic on certain residential streets. Emissions and noise from truck traffic have been a concern of Portside Community residents, and compliance with the regulation will bring needed emission reductions,

notably diesel particulates. SANDAG, Port of San Diego, and the City of San Diego are in the process of developing traffic improvements that will bring further emission reductions. Land use will be an ongoing agenda item for the steering committee where ideas and approaches to improved land use will be developed.

Summary

The steering committee and the District are ready and willing to implement a CERP and are well positioned to be successful. We have an established and diverse steering committee that is representative of the community. The logistics to having inclusive community meetings and the dissemination of information are firmly established. We have a solid, generalized understanding of where emission reductions are needed, and this understanding will significantly increase prior to the deadline of submitting a CERP to the Air Resources Board. We have a generalized understanding of where emission reductions need to be prioritized, and this understanding will also increase by the deadline for submitting the CERP. We feel being selected as a CERP community is important as it will expedite emission reductions in the Community by bringing stakeholders closer together with the result being a unifying community emission reduction plan.

We feel the community is ready to be selected as a CERP community and ask that the CARB Board approve this request.

Sincerely,

Jon Adams

Assistant Director