

AB 617 Community Air Protection Program

Steering Committee Meeting Notes

Perkins Elementary School

(1770 Main Street, San Diego 92113)

1/29/2019

6:00 pm - 8:00pm

- Opening Remarks

District AB-617 activities since 12/17/18 meeting:

- We had three bi-weekly calls with CARB where we discussed our ongoing activities
 - One call on emission inventory; CARB states air quality data will be available on the Web by July 1, 2019
 - We have asked for a CARB presentation on the topic at a future steering committee meeting
 - Recommended Aclima Inc. to conduct mobile monitoring
 - Could start as early as February 15th and will take 90 days
 - Call from CARB about possibly having a pilot license reader project in the community
-
- Jim Swaney (APCD Chief of Engineering) summarized the following document: *Expedited Best Available Retrofit Control Technology (BARCT) Schedule*
 - One requirement of AB 617 is for the San Diego County Air Pollution Control District (District) to ensure that industrial sources subject to the state Cap-and-Trade program implement Best Available Retrofit Control Technology (BARCT) for non-attainment pollutants by adopting an expedited schedule for permitted units that do not meet BARCT to do so (California Health and Safety Code subsections 40920.6 (c) and (d)).
 - The San Diego County Air Basin is currently designated as non-attainment for the federal 8-hour ozone standard, the state 8-hour and 1-hour ozone standards, and the state PM10 and PM2.5 standards. Therefore, the BARCT requirements will apply to equipment that emits Oxides of Nitrogen (NOx, a precursor to both

ozone and particulate matter), Volatile Organic Compounds (VOC, a precursor to ozone), and particulate matter.

- o The adopted schedule will give priority to the permitted units that have not modified emissions-related permit conditions for the greatest period of time, but still ensure that all units that must implement BARCT do so no later than December 31, 2023. Units that have implemented BARCT due to a permit revision or new permit issuance since 2007 are not subject to this requirement.
- o Based on information from the California Air Resources Board (CARB), through their pollution mapping tool, of the 17 sources subject to Cap-and-Trade in San Diego County, only two are considered industrial sources: CP Kelco and Solar Turbines – Kearny Mesa.
- o CP Kelco is located within the Portside Environmental Justice Neighborhood, which was selected by CARB as one of the AB 617 communities in 2018. They have 24 permit units that are potentially subject to the BARCT requirements, including boilers, mills & screens, solvent processing operations, storage tanks, and gas turbine cogen engines. Solar Turbines – Kearny Mesa is not located within an AB 617 selected community, and has 41 permit units, including a boiler, coating operations, emergency engines, thermal oxidizers, and turbine test cells.
- o Of the 65 permit units potentially subject to the BARCT requirements, six of them are not subject because they implemented Best Available Control Technology (BACT) through permit actions since 2007. BARCT, by virtue of being limited to controls or reductions that can feasibly be applied to existing units and contained within district rules, will serve as a floor for a BACT analysis. BACT looks at any potential controls, including those that could not be retrofit to existing sources (such as alternate basic equipment), and requires the most stringent control that is technologically feasible and cost-effective. Therefore, any permit unit that has employed BACT through a permit revision since 2007 has also employed BARCT and is not subject to this schedule.
- o An assessment was made for the other 59 units, to determine if it looked like they currently meet BARCT, or BACT, or not. Each operation was looked at to see how emissions are produced and how they are controlled or minimized. Then any additional controls that might be feasible were looked at to see if they had been found to be cost effective in recent BACT analyses. Based on this assessment, these 59 permit units currently meet BARCT.
- o As this assessment, however, is not a full BARCT evaluation, further analysis is required. The bulk of this further analysis will take place in concert with State Implementation Plan (SIP) planning efforts due to the federal Environmental

Protection Agency's (EPA) proposed decision to reclassify the San Diego County Air Basis as a serious non-attainment area for the 8-hour ozone standard. Once this decision becomes final (expected spring 2019), the District will have one year to prepare a new attainment plan, indicating what rules will be amended and/or adopted and their implementation timeline. As part of this SIP effort the District will also perform a BARCT analysis of rules that limit NOx and/or VOC emissions that apply to CP Kelco and/or Solar Turbines – Kearny Mesa. Additionally, a separate BARCT analysis will be performed for rules that limit particulate matter and apply to these two sources. These BARCT evaluations will be completed in 2019. Any rule revisions needed will take place in 2020, with full implementation required no later than December 31, 2023.

- While it is expected that the permit units subject to the AB 617 BARCT requirements currently meet BARCT, any rules found to need amending by the BARCT analysis occurring in 2019 will be amended in time to meet the December 31, 2023 deadline.
- Question – Can you tell us more about the emission units at CP Kelco?
- Answer – Yes, the co-gen units are exempt from BARCT, and other processes like their powder operations and solvent processes already have controls. Requiring these processes to install additional controls would not be cost effective.
- Question – Can you tell us what BARCT stands for?
- Answer – Yes, it stands for **Best Available Retrofit Control Technology**.

- Public Comments
 - No members from the public spoke during this time.

- Approval of 12/17/18 Steering Committee Meeting Notes
 - The committee approved the previous meeting's minutes.

- Presentation on District AB 617 Website Revisions
 - San Diego APCD website: www.sdapcd.org
 - Community Air Protection Program webpage: <https://www.sandiegocounty.gov/content/sdc/apcd/en/community-air-protection-program--ab-617-.html>
 - Steering Committee Documents webpage: <https://www.sandiegocounty.gov/content/sdc/apcd/en/community-air-protection-program--ab-617-/ab-617-steering-committee-documents.html>

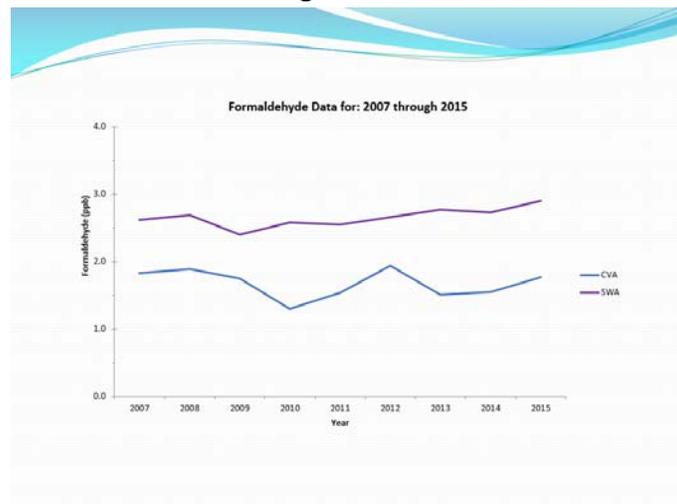
- la Página web del Programa Para Proteger El Aire de la Comunidad:
 - https://www.sandiegocounty.gov/content/sdc/apcd/en/community-air-protection-program--ab-617-/Documentos_Sobre_Las_Reuniones_Del_Comite_Directivo.html

- There was also a request (email sent to the District) from a professor at UC Davis who is leading a research project, under contract with the California Air Resources Board, to evaluate the effectiveness of community engagement in the implementation of AB 617. The professor wants to contact all the steering committee members.
 - After discussion with the steering committee it was decided that the District would forward the email to each of the steering committee members and they can individually decide if they wish to be contacted for the research project.

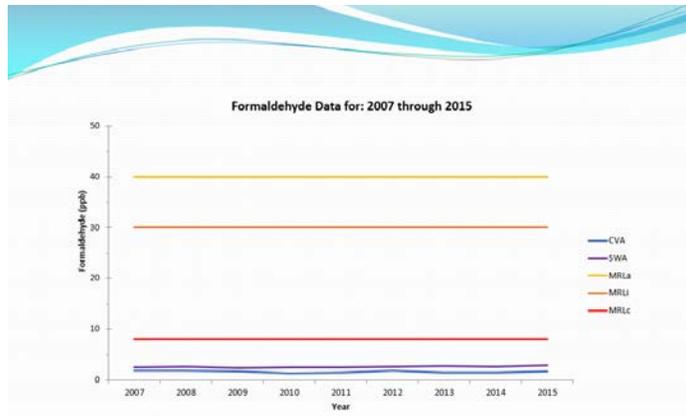
- Steering Committee Members Interactive Session (Continuation of Monitoring Sites) and Location of License Reader Cameras (New)
 - Discuss last month's suggested sites
 - Add / Modify to existing list of sites
 - Discuss best locations for license reader cameras
 - Question – Why do we need license plate readers?
 - Answer – Source apportionment, it will help us differentiate pollution from mobile sources (trucks, cars). It may also provide an opportunity to identify individual truck companies who we can approach with incentive funding opportunities.
 - Question – You said the license plate reader technology will be a pilot study. What does this mean?
 - Answer – This will be the first time this technology (used at border crossings) will be used to identify sources of air pollution. The Air Resources Board (ARB) would like for us to try this technology in the Portside Neighborhoods to identify and differentiate sources of mobile air emissions. From this pilot study we would gain knowledge on the effectiveness of the technology and also be able to learn from any failings of the project such as preferred placement of the equipment.
 - Question – How many license plate readers would there be?
 - Answer- We do not know this information at this time. There is a planned conference call with ARB where we need to discuss details of the pilot project.
 - Question – How will we deal with privacy concerns?

- Answer – Through the ARB, we will address any privacy concerns.
- Question – Will the location of the license plate readers need to be next to heavy polluting equipment?
- Answer – Yes, it would make sense to locate the equipment in areas that are high traffic/congested.
- Question – Will the data from the pilot study be used?
- Answer – Yes, it will be used to help us learn how to successfully implement this technology in other AB-617 communities throughout the State.
- Question – Have we reached out to the trucking industry about this pilot study?
- Answer – No, not at this time.
- Statement – I agree and believe this technology should be used at high congestion roads and intersections.
- Question – Will there be signs warning vehicles of cameras in the area?
- Answer – We don't know at this time.
- Statement – If we had a “heat map” of the Portside Neighborhoods showing the areas with the highest traffic that would help us know where to put the equipment.
- Question – Do we know how long the pilot program will be?
- Answer – No, not at this time.
- Question – Can you share the methodology of the pilot study?
- Answer – Yes, we will share and be transparent with this process.
- Clarification from the District – The license plate reader technology is separate from the mobile monitoring we plan to conduct with Aclima. Both the license plate reader technology and the mobile monitoring through Aclima are separate from the proposed 10 monitoring stations we plan to have in the Portside Neighborhoods.
- Question – Can you tell us more about the license plate reader technology?
- Answer – We know that SANDAG has used this technology at the border but no one in the room is an expert in this technology. As the pilot study progresses, we may be able to get an expert in the technology to come speak at our steering committee.
- Statement – If we know the locations of the 10 stationary monitoring stations SDG&E will try to help and facilitate the power needs of the equipment.
- Question – Will the license plate readers look at both cars and trucks?
- Answer – Yes, it will look at both.
- Question- Will the equipment located at the monitoring locations be able to withstand the weather?
- Answer – Yes, we have many years of experience through our regional monitors on how to stabilize equipment for both wind and rain.

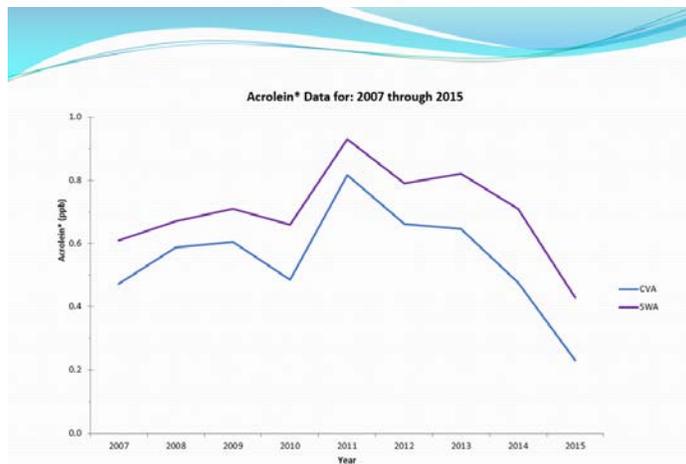
- Question – Can we see more monitoring locations on the East side of National city?
 - Answer – Yes, we agree that monitoring stations should be located both upwind and downwind of neighborhoods and air pollution sources.
 - Question- Can we discuss the Train museum in National city as a potential location for a monitoring station?
 - Answer – Yes, we have started to look at that location for a monitoring site. We believe there is enough land for the footprint needed but there may be an issue with power. We will continue to research this location.
 - Question – What are the electrical requirements for the monitoring equipment?
 - Answer – We require 20 amps.
 - Statement – On the list of proposed sites for monitoring locations you have “SA Recycling”. There is more than one location for SA recycling in the neighborhood. They are at 3202 Main St. and 3055 Commercial Street.
- Presentation on emission data – health thresholds (Bill Brick – APCD Chief of Monitoring & Technical Services)
 - The following 4 graphs were presented to show specific toxic (Formaldehyde, Acrolein) levels compared to a statewide average or a minimum risk level (acute, intermediate, chronic). These graphs were shown as a way to demonstrate how we can display information about toxics and health information to the steering committee.



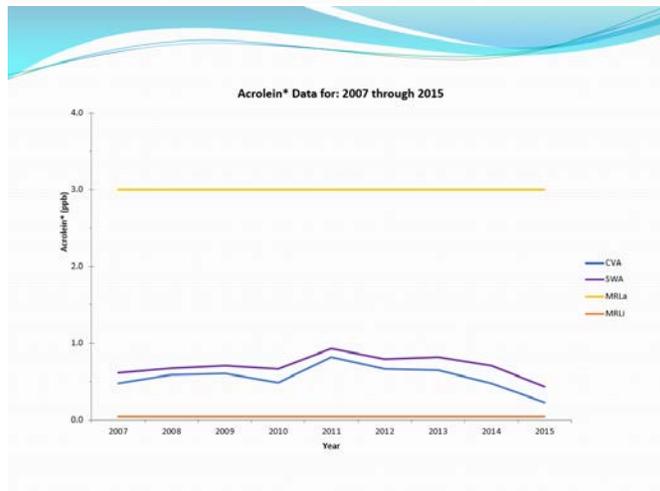
○



○



○

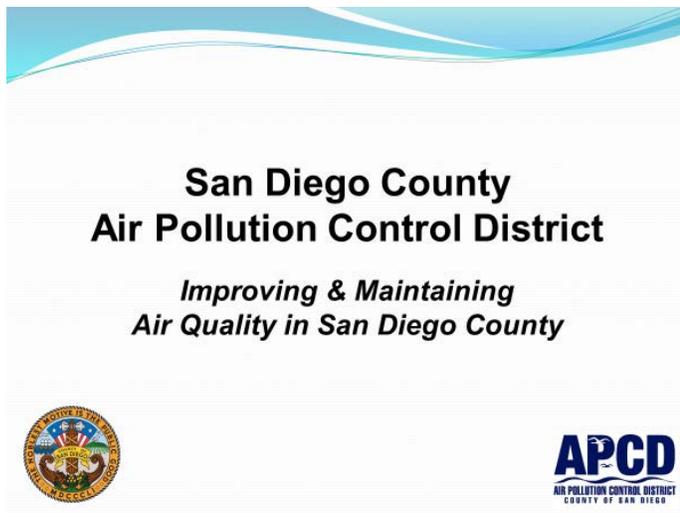


○

- Question – What are all the abbreviations on the graph?
- Answer – CVA – Chula Vista, SWA – State Wide Average, MRL_a -minimum risk level acute, MRL_i - minimum risk level intermediate, MRL_c - minimum risk level chronic

- Question – Why does the acrolein graph spike up in 2011?
- Answer- The weather has a large effect on pollution levels. We see these weather variations frequently in our data.
- Question – Where does the Statewide Average data come from?
- Answer – Any of the monitoring stations throughout the state which measure for that particular pollutant are brought into the data set to create a statewide average.
- Question – Can you provide information about each of the chemicals?
- Answer – Yes, we have information we can share.
- Question – Can you provide cancer trends with each of these pollutants?
- Answer – We are not health professionals or toxicologists so we cannot generate that data.
- Question – what do you with the data you collect?
- Answer – We are required to send it to the Environmental Protection Agency (EPA).
- Question – Can we get a scatter plot graph for this data?
- Answer – We will continue to look at different ways to present data to the steering committee. However, we don't believe a scatter plot graph would be best for this data set.
- Question – Can we get more information on criteria pollutants?
- Answer – Yes, the presentation Rob Reider (Deputy Director, APCD) is about to give will provide more information about criteria pollutants.

- Presentation on District Functions - Rob Reider, APCD Deputy Director



○

Regulated Air Pollutants

- **Traditional Air Pollutants**
(Subject to health-based standards)
 - **Ozone**
 - Particulate Matter
 - Nitrogen Dioxide
 - Carbon Monoxide
 - Sulfur Dioxide
 - Lead
- **Toxic Air Pollutants**
(Pose greater risk to public health)
 - **Diesel Particulate Matter**
 - Benzene
 - Butadiene
 - Chromium
 - Many others



2

Ozone Air Pollution



3

Comprehensive Regulatory Efforts



U.S. Environmental Protection Agency

- National standards for outdoor air quality
- Emission standards for interstate-traveling mobile sources
- Oversight of state air quality programs



California Air Resources Board

- California standards for outdoor air quality
- Emission standards for in-state mobile sources, consumer products
- Oversight of regional air quality programs



San Diego County Air Pollution Control District

- Air quality monitoring
- Clean air attainment plans
- Emission standards for stationary (fixed) sources
- Assist CARB in reducing mobile-source emissions (inspections, grants)

4

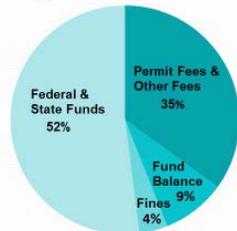
35 Air Districts



5

APCD Operational Plan

- \$27 million annual operating budget
- 150 staff
 - Planners, engineers, inspectors, scientists, support staff



Funding Sources

6

Yearly Activity

- Receive 400-1,000 permit applications
 - Factories, gas stations, stationary engines
- Renew 8,200 operating permits
- Conduct 16,100 inspections
- Grant millions of dollars to emission reduction projects
 - Majority in disadvantaged & low-income communities
- Conduct public outreach, education, & engagement
 - Community meetings & events
 - Public workshops on draft proposed rules & clean air plans
 - Compliance assistance classes & online instructional videos



7

Mobile Source Compliance Program

- Mobile sources are largest emitters of air pollutants
- APCD is assisting CARB with local enforcement efforts
 - Memorandum of Understanding with CARB & CHP
 - Inspect for compliance with State's diesel regulations
 - Heavy-duty on-road trucks & off-road equipment



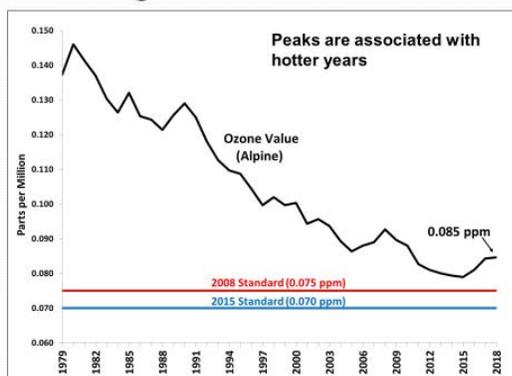
8

Grants for Cleaner Diesel Engines



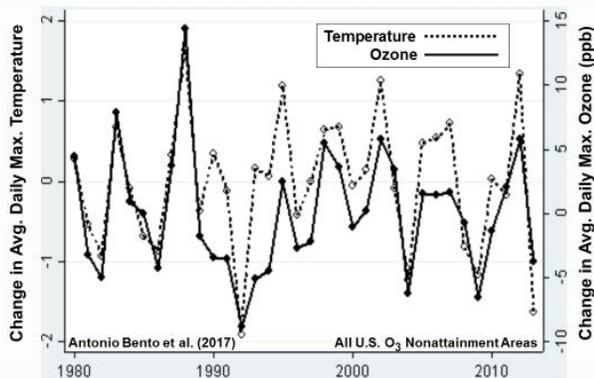
9

Regional Ozone Trend



10

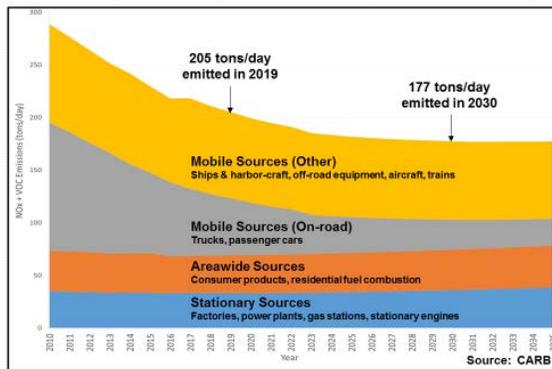
Temperature & Ozone



11

Ozone-forming Emissions in Region

All Sources, Currently Adopted Emission Control Regulations



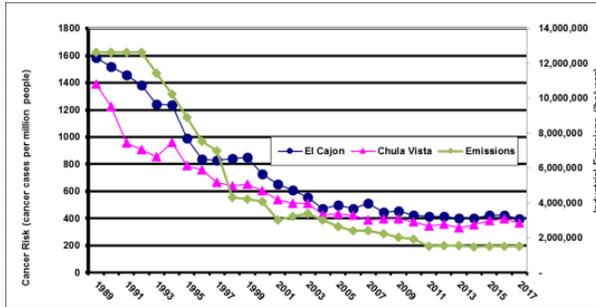
12

Fine Particulate Matter (PM_{2.5}) Trends



13

Toxic Air Contaminant Emissions & Cancer Risk



14

Environmental Justice - AB 617



15

Stakeholders

- 3.3 million residents
- 35 million yearly visitors
- 4,800 permit holders
- Other regulated sources
- APCD Advisory Committee
- APCD-Industry Working Group
- Industry Associations
- Community Steering Committee(s)
- Community Organizations



16

- Question – Can you talk about why criteria pollutants and toxic pollutants are measured different (risk vs. standard)?
- Answer – Criteria air pollutants are subject to ambient air quality standards. These standards define the threshold concentrations in the outdoor air below which no significant health impacts are expected to occur. Concentrations above the

- thresholds, however, may cause public health impacts including heart and lung disease. By contrast, toxic air pollutants may cause more serious health impacts including cancer, and have no identified threshold concentration below which no adverse health effects occur. Their concentrations in the outdoor air are assessed based on risks to public health, e.g., the number of possible additional cases of cancer over a lifetime of exposure for every one million people (e.g., 1 in a million or 10 in a million).
- Question – Will the license plate reader cameras start next month?
 - Answer – We do not know at this time. We have a call with ARB to discuss the program.
 - Question – You said we selected Aclima to conduct our mobile monitoring. Can you show us the other 2 bids that were not selected?
 - Answer – Yes, we can show you the other 2 bids.
 - Question – Can we ask the Air Resources Board if they have any metrics on the progress being made from the existing mobile sources regulations?
 - Answer – Yes, we can see if ARB has any information to share about progress in reducing mobile source emissions.
- Closing Remarks
 - The steering committee was asked if it would be ok to cancel the scheduled February 26th meeting because there would not be any new information to share at that time. A majority of the steering committee members agreed to cancel the meeting and there were no dissenting voices raised.

Next scheduled meeting is 3/21/19 at Perkins Elementary School Cafeteria (1770 Main Street, San Diego, 92113 from 6:00 pm - 8:00 pm). Please note the meeting scheduled for 2/26 has been cancelled.