BOARD MEETING DATE: June 3, 2022 AGENDA NO. 27

PROPOSAL: Determine That the South Los Angeles Community Emissions Reduction Plan is Exempt from CEQA, and Adopt the South Los Angeles Community Emissions Reduction Plan

SYNOPSIS: Assembly Bill 617 (AB 617) requires air districts to adopt a Community Emissions Reduction Plan (CERP) within one year of CARB selection. CARB selected the South Los Angeles (SLA) Community in February 2021, but the CERP adoption date was extended by CARB from February 2022 to June 2022 to allow for additional time to collaborate with the community. The SLA CERP was developed with three community co-lead organizations: Physicians for Social Responsibility-Los Angeles, Strategic Concepts in Organizing and Policy Education, and Watts Clean Air and Energy Committee. This CERP is designed to reduce emissions and exposure to air pollution by addressing priorities identified by the community. The CERP also includes an implementation schedule and enforcement actions. The Community Steering Committee (CSC) and community co-leads' partnership and engagement have been critical throughout the development of the SLA CERP.

COMMITTEE: Stationary Source, May 20, 2022, Reviewed

RECOMMENDED ACTIONS:
Adopt the attached Resolution to:
1. Determine that the South Los Angeles Community Emissions Reduction Plan is exempt from the California Environmental Quality Act; and
2. Adopt the South Los Angeles Community Emissions Reduction Plan.

Wayne Nastri
Executive Officer

KH: SR: MK: UV: NS: DT: PR: BH: RD

Background

Assembly Bill 617 (AB 617) established new requirements for improving air quality in disadvantaged communities in California. AB 617 requires a statewide strategy with focused actions for communities heavily impacted by air pollution. These actions

include developing community air monitoring plans (CAMPs) and/or community emissions reduction plans (CERPs) to reduce emissions of toxic air contaminants (TACs) and criteria pollutants.

In 2018, CARB adopted the Community Air Protection Blueprint (CARB Blueprint) as the statewide strategy to guide the development (e.g., public process), content, and implementation of CAMPs and CERPs. On February 25, 2021, CARB designated South Los Angeles (SLA) as a Year 3 AB 617 community to prepare a CAMP and CERP, which represented the sixth AB 617 community for the South Coast AQMD. AB 617 directs air districts to adopt CERPs within one year of CARB designation. However, at the request of the South Coast AQMD and community representatives, CARB extended the adoption date for the SLA CERP four additional months to allow additional time for staff to collaborate with the Community Steering Committee (CSC) and three community co-leads to develop the CERP.

Community Co-Leads
The SLA CERP was developed with three community co-lead organizations: Physicians for Social Responsibility-Los Angeles; Strategic Concepts in Organizing and Policy Education; and Watts Clean Air and Energy Committee. The community co-lead organizations partnered with the South Coast AQMD staff to lead and structure CSC meetings, identify air quality priorities and actions for the CERP, and wrote portions of the CERP.

Summary of Air Quality Priorities and Actions
The SLA CERP includes 73 actions to address the community's top five (5) air quality priorities recommended by the CSC. The CSC and community co-leads provided input and guidance based on community knowledge and expertise, and this feedback was instrumental in developing the CERP.

Public Process
Beginning January 2021, staff facilitated a community-led process in the SLA community to develop the CAMP and CERP. Community co-leads were selected by the community and a CSC was formed as the foundation of this community-led process. The CSC is made up of active residents, community leaders, local business owners or workers, community-based organizations, local agencies, schools, universities, and other community stakeholders. South Coast AQMD used a community co-lead model to ensure that CERP development was a community-driven process and held weekly meetings with the community co-leads. CSC members and community co-leads also conducted community-level outreach to engage with community members who were unable to attend CSC meetings.

Since January 2021, more than 80 community meetings were held to develop the SLA CERP. These meetings included 16 CSC meetings, approximately 60 meetings with the community co-leads, CAMP and CERP workshops, eight Monitoring Working Team

meetings, two virtual office hours, and two in-person meet and greets. Approximately 30 to 80 people attended each CSC meeting. Meeting agendas, presentations, and handouts were provided in English and Spanish. Additionally, English and Spanish interpretation was provided for each meeting to encourage broader participation.

In addition to the CSC meetings, South Coast AQMD staff held one-on-one meetings with residents, community leaders, and stakeholders to enhance community understanding, expand participation opportunities, and create more comfortable spaces for input to develop the CAMP and CERP. To further facilitate communication and improve accessibility, staff created an SLA community webpage to post updates and information about the development of the CAMP and CERP.

SLA CERP

The SLA CERP includes community-identified air quality priorities based on local sources of air pollution. The CSC worked with staff and the community co-leads to develop a set of actions to be implemented by South Coast AQMD and CARB, in collaboration with government agencies, organizations, businesses, and other entities. Each action is implemented based on a set of strategies with goals and timelines to reduce emissions, exposure, and/or gather and disseminate information. The entity (e.g., government agency, organization, business) responsible for the action is also identified. While some actions would be conducted within the timeframes specified in the plan, other activities such as monitoring, enforcement, and implementation of proposed or amended rules (e.g., updated notification systems) would remain in place beyond the implementation period of the CERP.

The SLA CSC identified five air quality priorities: 1) mobile sources (e.g., trucks, locomotives, buses, off-road construction equipment), 2) auto body shops, 3) general industrial facilities (e.g., manufacturers, dry cleaners, gas stations), 4) metal processing facilities (e.g., metal recyclers and scrap yards), and 5) the oil and gas industry (e.g., oil wells and drill sites operations). Community concerns surrounding these air quality priorities include the proximity of these sources to sensitive receptors, the potential adverse health impacts from toxic air contaminants (e.g., diesel particulate matter, perchloroethylene, hexavalent chromium, nickel, arsenic), ensuring implementation of best management practices, and distribution of information. Through the CERP actions, staff will collaborate with appropriate entities to address these concerns. There are additional community concerns which are beyond South Coast AQMD's direct authority, or are not prioritized by the CSC, such as land-use issues, airplane exhaust, and fireworks. Therefore, those concerns are not included in this CERP.

Emission Reduction Targets

The CERP outlines actions to address the air quality concerns prioritized by the SLA CSC. These actions are expected to result in emission reductions of nitrogen oxides (NOx), diesel particulate matter (DPM), and other criteria pollutants and toxic air contaminants. Projected emission reductions, based on incentive projects (assuming a minimum of $10 million invested for mobile source projects) and emission reduction

targets from CARB's statewide measures, are projected to result in reductions of 193 tons per year (tpy) NOx and 2.3 tpy DPM by 2026 and 300 tpy NOx and 3.8 tpy DPM by 2031. Additional emission reductions from the CERP are expected through rule development, enhanced enforcement efforts and inspections, incentives for clean technologies and/or feasible alternatives, and through collaboration with other regulatory agencies. These additional emission reductions are not quantifiable at this time, but updates on emission reductions achieved will be provided to the CSC during CERP implementation.

Key Issues

Throughout the CERP development process, staff worked with the community co-leads, the CSC, and the community stakeholders to address a variety of issues. However, there are two remaining key issues: 1.) CERP development process and timeline, and 2.) quantifiable, permanent, and enforceable emission reductions.

CSC members have commented that the development of the CERP was not a community-driven process and the CERP is not representative of the community's concerns. South Coast AQMD staff made numerous efforts to provide the community co-leads the space to work meaningfully in a collaborative fashion to develop the CERP. Weekly meetings were integrated into the process where the community co-leads provided input and guidance on the agenda, the structure of the CSC meetings, identification of presenters, review of presentations prior to CSC meetings, concepts and ideas for CERP actions, and direct input into the CERP. Many of the recommendations made by the community co-leads, the CSC, and community are incorporated into this CERP. The South Coast AQMD staff shares the sentiment of the community co-leads that the timeframe to develop the CERP is too compressed, even with the additional four months. The South Coast AQMD has been a key supporter of Assembly Bill 1749 (C. Garcia) which would extend the allowable time for CERP development from one to two years.

CSC members have also expressed concern that the CERP will not result in tangible emission reductions nor does it propose quantifiable, permanent, and enforceable emission reductions beyond what is required by existing rules and/or regulations. While many actions in the CERP may result in emission reductions that are not quantifiable (i.e., enhanced enforcement, outreach and education actions), the CERP pursues a suite of actions that will reduce emissions and/or exposure and provide long-term benefits for the SLA community. The CERP commits to initiating six rule developments for: Proposed Amended Rules 1102, 1148.1, 1148.2, 1151, and 1171, and Proposed Rule 1460. These rule developments will likely result in emission reductions that go above and beyond existing requirements. Additionally, the CERP commits to evaluating best management practices (BMPs) for all metal processing rules, which may result in additional rulemaking efforts to develop amendments where inadequacies in BMPs are identified. While emission reductions from these actions are not yet quantifiable, they will be quantified in the rulemaking process.

California Environmental Quality Act (CEQA)
Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002 (k) and 15061, the proposed project is exempt from CEQA as set forth in CEQA Guidelines Sections 15061(b)(3), 15262, 15301, 15306, 15308, 15309, and 15321. Further, there is no substantial evidence indicating that any of the exceptions to the categorical exemptions set forth in CEQA Guidelines Section 15300.2 apply to the proposed project. A Notice of Exemption has been prepared pursuant to CEQA Guidelines Section 15062 and is included as Attachment C to this Board Letter. If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Planning and Research.

Implementation and Approval of CERP
Implementation of the SLA CERP is anticipated to begin in the second quarter of 2022. CARB staff is expected to review and evaluate this CERP and will hold a public hearing on August 25, 2022, to consider the CERP for approval. The implementation of this CERP is expected to continue over approximately five years.

Benefits to South Coast AQMD
The implementation of the SLA CERP will help advance South Coast AQMD's mission to clean the air, especially in the most impacted and disadvantaged communities within South Coast AQMD's jurisdiction. Additionally, emission reductions achieved through implementation of this CERP will provide emission reduction benefits toward achieving state and national air quality standards. Moreover, emission reductions of toxic air contaminants will also reduce localized public health impacts for SLA.

Resource Impacts
South Coast AQMD received $21.9 million to support implementation of AB 617 for the upcoming year of this program for all South Coast AQMD AB 617 communities. Additionally, Community Air Protection incentive funds will be used toward implementing incentive projects that are located in environmental justice communities. Staff continues to work with the California state legislature to secure sustained funding for AB 617 statewide.

Implementation costs for future years are dependent on the number of communities that are selected, and the amount of funding allocated by the legislature to support AB 617 implementation by the local air districts.

Attachments
A. Resolution
B. Final South Los Angeles Community Emissions Reduction Plan
C. Notice of Exemption from CEQA
D. Board Meeting Presentation

ATTACHMENT A

RESOLUTION NO. 22-_____

A Resolution of the South Coast Air Quality Management District (South Coast AQMD) Governing Board determining that the South Los Angeles (SLA) Community Emissions Reduction Plan (CERP) is exempt from the requirements of the California Environmental Quality Act (CEQA).

A Resolution of the South Coast AQMD Governing Board adopting the SLA CERP.

WHEREAS, the South Coast AQMD Governing Board finds and determines that the SLA CERP is considered a "project" as defined by CEQA; and

WHEREAS, the South Coast AQMD Governing Board finds and determines after conducting a review of the proposed project in accordance with CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA, and CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA, that the proposed project is exempt from CEQA; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that implementing the various components of the proposed project would either not cause any physical changes, or the physical changes that may occur as a result would only require minimal construction activities and cause negligible physical impacts, it can be seen with certainty that there is no possibility that implementing the proposed project may have any significant effects on the environment, and is therefore, exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project is also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, because the proposed project is designed to further protect or enhance the environment and health of residents of the SLA community and all of the action items within the SLA CERP support this goal; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project contains action items which qualify as feasibility or planning studies which are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262 – Feasibility and Planning Studies; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project may result in some minor physical modifications to existing structures or buildings, such as installing air filters or monitoring equipment, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301 – Existing Facilities; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project involves the collection or exchange of information or data obtained from inspections and air monitoring, which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15306 – Information Collection; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project also involves inspections that require performance or compliance checks which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15309 – Inspections; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project relies on enforcement activities which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies; and

WHEREAS, the South Coast AQMD Governing Board has determined that there is no substantial evidence indicating that any of the exceptions to the categorical exemptions set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project; and

WHEREAS, the South Coast AQMD staff has prepared a Notice of Exemption for the proposed project that is completed in compliance with CEQA Guidelines Section 15062 – Notice of Exemption; and

WHEREAS, the SLA CERP and other supporting documentation, including but not limited to the Notice of Exemption, were presented to the South Coast AQMD Governing Board and the South Coast AQMD Governing Board has reviewed and considered this information, as well as has taken and considered staff testimony and public comment prior to approving the project; and

WHEREAS, Assembly Bill 617 (AB 617) directs the California Air Resources Board (CARB) to select locations around the state for preparation of community emissions reduction programs; and

WHEREAS, in 2020, the South Coast AQMD Governing Board recommended communities to CARB for the AB 617 program; and

WHEREAS, in 2021, CARB selected the community of SLA as one of the communities for which a CERP shall be prepared; and

WHEREAS, the AB 617 statute specifies that the South Coast AQMD must adopt the SLA CERP within one year of the CARB Board's selection of the community; and

WHEREAS, in 2022, CARB extended the adoption date of the SLA CERP to June 2022; and

WHEREAS, the SLA CERP is a planning document designed to assist future regulatory programs and rule development efforts, and to reduce emissions of and exposure to air toxics and other pollutants; and

WHEREAS, the SLA CERP is required by AB 617 and it builds upon existing criteria pollutant and air toxic programs, with greater emphasis on cumulative and localized impacts; and

WHEREAS, although the results of Multiple Air Toxics Exposure Study V (MATES V) show regional reductions in health risk from exposure to toxic air contaminants, some communities such as SLA are disproportionately impacted by air toxics and other environmental pollution, as well as social and economic burdens;and

WHEREAS, the SLA Community Steering Committee and community co-leads have worked with staff to develop the SLA CERP to reflect the community's air quality priorities and strategies to address these priorities; and

WHEREAS, the SLA CERP aims to reduce local sources of air pollutants, air toxics, and other pollutants in the SLA community; and

NOW, THEREFORE BE IT RESOLVED, that the South Coast AQMD Governing Board does hereby determine, pursuant to the authority granted by law, that the SLA CERP is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. Further, the SLA CERP contains action items which are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262 – Feasibility and Planning Studies. The proposed project contains action items that are also categorically exempt from CEQA pursuant to: CEQA Guidelines Section 15301 – Existing Facilities, CEQA Guidelines Section 15306 – Information Collection, CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, CEQA Guidelines Section 15309 – Inspections, and CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies. No exceptions to the application of the categorical exemptions set forth in CEQA Guidelines Section 15300.2

– Exceptions, apply to the proposed project. This information was presented to the South Coast AQMD Governing Board, whose members exercised their independent judgment and reviewed, considered, and approved the information therein prior to acting on the proposed SLA CERP; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board finds that the SLA CERP meets the requirements of AB 617 and will advance the mission of reducing air pollution at a community scale in the SLA community and will provide emission reduction benefits toward achieving state and national air quality standards; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board does hereby adopt, pursuant to the authority granted by law, the SLA CERP as set forth in the attached, and incorporated herein by reference; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board authorizes staff to make any necessary, non-substantive edits which do not have any material impact on the environment to the SLA CERP prior to submission to CARB for approval; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board hereby directs the Executive Officer to forward a copy of this Resolution and the SLA CERP to CARB Board for approval; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board directs staff to periodically report to the Stationary Source Committee on the implementation of the SLA CERP, including updates on the actions within the plan and the emissions reductions achieved.

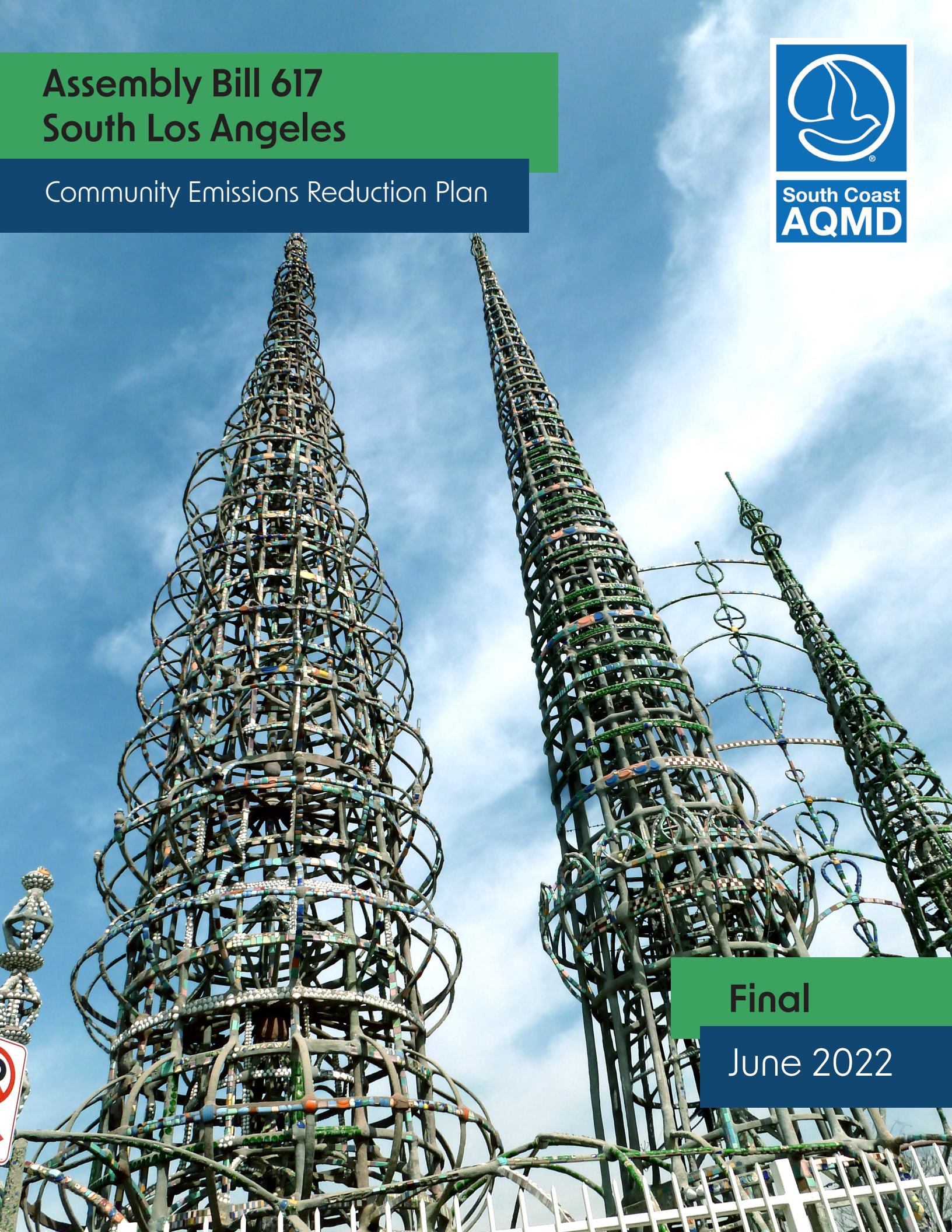
DATE: _____ _____

Faye Thomas, Clerk of the Boards

Assembly Bill 617
South Los Angeles

Community Emissions Reduction Plan

South Coast AQMD



Final

June 2022

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WAYNE NASTRI

Preface

This South Los Angeles (SLA) Community Emissions Reduction Plan (CERP) was developed in collaboration with the Community Steering Committee (CSC), community co-leads (Physicians for Social Responsibility-Los Angeles (PSR-LA); Strategic Concepts in Organizing and Policy Education (SCOPE); and Watts Clean Air and Energy Committee (WCAEC)), and other community stakeholders.

South Coast AQMD recognizes and appreciates the efforts and dedication to continuously work and collaborate to develop the SLA CERP and Community Air Monitoring Plan (CAMP) through the challenges of the pandemic. The overall goal of AB 617 and this CERP is to improve public health from air quality related issues within SLA, through a community-driven process. Over the 18 months leading up to CERP adoption, the community co-leads put in countless hours to help develop measures, engage the community, meet with staff on over 60 occasions, and guide much of what was incorporated into the Final CERP. To ensure that the voice of the CSC, community co-leads, and other community stakeholders is heard more directly, the SLA CERP incorporates sections and chapters that were written by the community co-leads. These chapters and appendix provide historical background information on environmental justice issues experienced in SLA and discusses the importance of a just transition to cleaner air for a community that is burdened with a variety of socioeconomic and environmental issues.

With recognition and gratitude to all involved, implementation of the SLA CERP will achieve emission reductions that will provide long-term benefits for public health in SLA above and beyond existing air quality programs in place.

CONTRIBUTORS

South Coast Air Quality Management District

Wayne Nastri
Executive Officer

Susan Nakamura
Chief Operating Officer

Sarah Rees, Ph.D.
Deputy Executive Officer
Planning, Rule Development, and Implementation

Michael Krause
Assistant Deputy Executive Officer
Planning, Rule Development, and Implementation

Kathryn Higgins
Director of Community Air Programs

Uyen-Uyen Vo
Planning and Rules Manager
Planning, Rule Development, and Implementation

Nicole Silva
Program Supervisor
Planning, Rule Development, and Implementation

Diana Thai
Program Supervisor
Planning, Rule Development, and Implementation

Authors

Marc Carreras Sospedra, Ph.D. – Air Quality Specialist
Angela Haar, Ph. D. – Principal Air Quality Chemist
Belinda Huy – Air Quality Specialist
Sang-Mi Lee, Ph.D. – Planning & Rules Manager
Pavan Rami – Staff Specialist
Ricardo Rivera – Public Affairs Manager
Paul Rodriguez – Assistant Air Quality Specialist
Bernard Tolliver – Senior Public Affairs Specialist

Reviewers

Barbara Baird, J.D. – Chief Deputy Counsel
Daphne Hsu, J.D. – Principal Deputy District Counsel
Stacey Pruitt, J.D. – Senior Deputy District Counsel
Nicholas Sanchez, J.D. – Assistant Chief Deputy Counsel

Further Acknowledgements

Planning, Rule Development, and Implementation

Rodolfo Chacon – Program Supervisor
Robert Dalbeck – Air Quality Specialist
Jose Enriquez – Air Quality Specialist
Scott Epstein, Ph.D. – Program Supervisor
Heather Farr – Planning and Rules Manager
Neil Fujiwara – Program Supervisor
Victor Juan – Program Supervisor
Eugene Kang – Planning and Rules Manager
Nishanth Krishnamurthy, Ph.D. – Air Quality Specialist
Michael Laybourn – Program Supervisor
Xiang Li, Ph.D. – Air Quality Specialist
Ian MacMillan – Assistant Deputy Executive Officer
Michael Morris – Planning & Rules Manager
Charlene Nguyen, Ph.D. – Air Quality Specialist
Pedro Piqueras, Ph.D. – Air Quality Specialist
Barbara Radlein – Program Supervisor
Dianne Sanchez, Ph.D. – Former Air Quality Specialist
Nico Schulte, Ph.D. – Air Quality Specialist
William Senga – Air Quality Specialist
Elaine Shen – Planning & Rules Manager
Isabelle Shine – Air Quality Specialist
Vicki White – Planning & Rules Manager

Legislative and Public Affairs/Media Office

Derrick Alatorre – Deputy Executive Officer
Evangelina Barrera – Senior Public Affairs Specialist
Philip Crabbe III – Senior Public Affairs Manager
Sally Egan – Graphic Arts Illustrator II
Arlene Farol – Senior Public Affairs Specialist
Nahal Mogharabi – Director of Communications
Ryan Stromar – Senior Public Affairs Specialist
Gina Triviso – Senior Public Affairs Specialist
Daniel Wong – Senior Public Affairs Specialist

Technology Advancement Office

Kelly Trainor Gamino – Program Supervisor
Dan Garcia – Planning and Rules Manager
Aaron Katzenstein, Ph.D. – Deputy Executive Officer
Frances Maes – Staff Specialist
Matt Miyasato, Ph.D. – Former Deputy Executive Officer
Walter Shen – Planning and Rules Manager

Monitoring and Analysis Division

Jason Low, Ph.D. – Deputy Executive Officer
Matt Miyasato, Ph.D. – Former Deputy Executive Officer
Payam Pakbin, Ph.D. – Program Supervisor
Olga Pikelnaya, Ph.D. – Program Supervisor
Andrea Polidori, Ph.D. – Director of Monitoring and Analysis
Laura Saucedo – Principal Air Quality Chemist

Office of Compliance and Enforcement

Jack Cheng – Senior Enforcement Manager
Terrence Mann – Deputy Executive Officer
Kevin Orellana – Senior Enforcement Manager
Pavan Rami – Staff Specialist
Rafael Reynosa – Senior Enforcement Manager
Victor Yip – Assistant Deputy Executive Officer

Engineering and Permitting

Jason Aspell – Deputy Executive Officer
Mitch Haimov – Senior Air Quality Engineering Manager
Jillian Wong, Ph.D. – Assistant Deputy Executive Officer

Information Management

Xin Chen – Information Technology Manager
Ron Moskowitz – Deputy Executive Officer
Brian Roche – Systems and Programming Supervisor

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Disclaimer: The views and opinions expressed in Chapter 2c are those of the South Los Angeles community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air Quality Management District.

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Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process

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Disclaimer: The views and opinions expressed in Appendix 2b are those of the South Los Angeles community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air Quality Management District.

Appendix 2d: Source Attribution

Appendix 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process

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Executive Summary

Introduction

The South Los Angeles (SLA) Community Emissions Reduction Plan (CERP) is a critical part of implementing Assembly Bill 617 (AB 617),[1] a California law that addresses the disproportionate impacts of air pollution in environmental justice (EJ) communities. "Environmental justice" is defined as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."[2] The AB 617 program invests resources and focuses on improving air quality in EJ communities.

AB 617 communities are designated by California Air Resources Board (CARB), and they specify the plan(s) for the community as either an emissions reduction program, an air monitoring system, or both. Within one year of an AB 617 community designation, the local air district must develop and adopt an emissions reduction program in consultation with CARB, community-based organizations, affected sources, and local governmental bodies, which must be implemented within five years.[3] The air monitoring system must be developed and deployed within one year of community designation.[4] An essential element of the program is partnership and collaboration with the community to address the community's air quality priorities and develop actions to address the air quality priorities.

The Community Steering Committee (CSC) is a diverse group of people who live, work, own businesses, or attend school within the community. Additionally, local land-use agencies, public health agencies, regulatory agencies, and elected officials may have representation on the CSC. The CSC guides the development and implementation of the emissions reduction program and air monitoring system. In 2018, CARB designated their first AB 617 communities (Year 1 communities). On February 25, 2021, CARB designated Year 3 communities, including SLA which was designated for both an emissions reduction program and an air monitoring system. This CERP serves as the emissions reduction program and outlines goals and actions by the CSC, South Coast Air Quality Management District (South Coast AQMD), and CARB to reduce air pollution in the SLA community. Additionally, a Community Air Monitoring Plan (CAMP) has been developed as the air monitoring system and will further explain air monitoring efforts included in this CERP. Findings from air monitoring will help to identify and evaluate next steps. South Coast AQMD will work with the CSC to review those findings and make necessary adjustments to implement the SLA CERP.

For this community, South Coast AQMD used a community co-lead model to ensure that the development and implementation of the SLA CERP is a community-driven process. The three

[1] California Health and Safety Code, Section 44391.2
[2] California Government Code, Section 65040.12
[3] California Health and Safety Code, Section 44391.2 (b)
[4] California Health and Safety Code, Section 42705.5 (b)

community co-lead organizations are: Physicians for Social Responsibility-Los Angeles, Strategic Concepts in Organizing and Policy Education, and Watts Clean Air and Energy Committee. The community co-leads were integral to the development of the CERP by providing additional insight about the community and having a unique knowledge of air quality issues within their community as well as connections with community members. As discussed in Chapters 2 and 3 of the CERP, community co-leads participated in numerous meetings and helped to develop the structure of CSC meetings to better connect with community members and enrich the overall process of identifying air quality issues and potential solutions.

The SLA AB 617 work was unique compared to the previous communities that South Coast AQMD worked with as SLA was the first community where South Coast AQMD and community co-leads led CSC meetings together. An additional complexity to this community, was that all meetings were held virtually due to the COVID-19 pandemic. To help facilitate meetings, a professional facilitator was used to ensure that South Coast AQMD and community co-leads were collaborating equally in the development of the CERP. Connecting and creating relationships was more challenging since in-person meetings were not possible during the pandemic. It is important to recognize the dedication of all the community co-leads, CSC members, and community representatives to continuously work and collaborate to develop the CERP and CAMP through the challenges of the pandemic.

Based on the sources of air pollution impacting the community, the SLA CSC identified the following air quality priorities to be addressed by this CERP:

- Mobile Sources
- Auto Body Shops
- General Industrial Facilities
- Metal Processing Facilities
- Oil and Gas Industry

At its core, this CERP seeks to address these air quality priorities with actions that reduce air pollution emissions from sources within the community and reduce air pollution exposure for the people in the community. Actions in this plan include:

- Developing regulations to capture new sources of air pollution;
- Enforcing rules to ensure compliance with existing regulations;
- Providing incentives to accelerate the adoption of cleaner technologies; and
- Conducting air monitoring to characterize emissions.

These efforts will provide critical information to help guide investigations and provide public information. Conducting outreach will also provide useful information to support the public in making informed choices. Collaborative efforts with other regulatory agencies, community-based organizations, businesses, and other stakeholders will amplify the impact of these actions. Many of the actions included in this CERP will be conducted during the five-year implementation

timeframe of this plan, which begins at CERP adoption. However, there are some actions (e.g., implementation of regulations and best management practices, ongoing enforcement activities, notifications, incentive programs) initiated during the implementation timeframe that will continue to result in emission and exposure reductions beyond the five-year timeframe of this CERP. The focus of this plan is to improve air quality in the SLA community through concentrated efforts and community partnerships. The community co-leads, CSC, South Coast AQMD, and CARB will continue to engage in the process of implementing the CERP and tracking its progress during the five-year timeframe.

The Reader's Guide to this Community Emissions Reduction Plan

This CERP is organized into six chapters, containing background information and strategies for reducing exposure to air pollution in the SLA community:

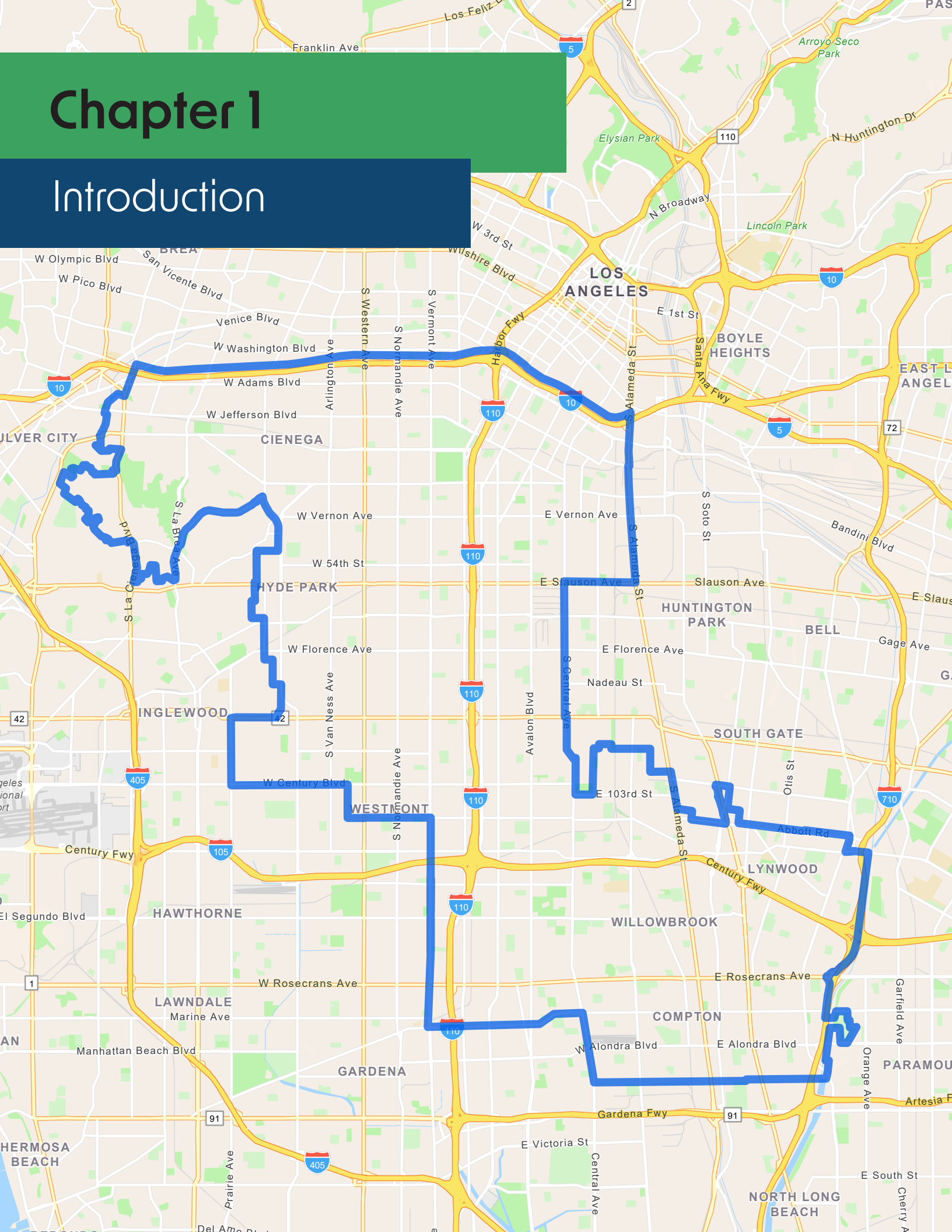
- Chapter 1: Introduction, provides background information about the AB 617 program and community designation and CERP development timeline;
- Chapter 2
    - Chapter 2a: Community Profile, provides context in understanding attributes of the community, including a general overview of the community, a discussion of community issues, and a characterization of public health data and socioeconomic factors;
    - Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, written primarily by the community co-leads and provides the characteristics of SLA from the perspective of the community, the role of community co-leads in developing this CERP, and also includes quotes from community members *(Disclaimer: The views and opinions expressed in Chapter 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast AQMD.)*;
    - Chapter 2c: Just Transition as Presented by the Community Co-Leads, written primarily by the community co-leads and provides their view on an equitable transition to alternative technologies *(Disclaimer: The views and opinions expressed in Chapter 2c are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast AQMD.)*;
    - Chapter 2d: Emissions and Source Attribution, provides an overview of air pollution sources in the community;

- Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process, provides details on community meetings, the CSC process, community co-leads, and community engagement;
- Chapter 4: Enforcement Overview and History, provides information about past and ongoing enforcement activities conducted by both the South Coast AQMD and CARB;
- Chapter 5: Chapter 5 is organized by air quality priorities, followed by actions to address each air quality priority. The actions are organized in a table that identifies the entities responsible for each action and the implementation timeframe;
    - Chapter 5a: Introduction to Actions to Reduce Community Air Pollution;
    - Chapter 5b: Mobile Sources;
    - Chapter 5c: Auto Body Shops;
    - Chapter 5d: General Industrial Facilities;
    - Chapter 5e: Metal Processing Facilities;
    - Chapter 5f: Oil and Gas Industry;
- Chapter 6: Community Air Monitoring Plan (CAMP) Summary, provides a summary of the CAMP and overview of the air monitoring approach;
- Appendix 2a: Community Profile, provides data and impacts of toxic air pollutants and other environmental pollution and public health, social, and economic factors;
- Appendix 2b: Environmental Justice Timeline as Presented by the Community Co-Leads, provides a timeline created by the community co-leads that reflects the EJ struggle *(Disclaimer: The views and opinions expressed in Appendix 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast AQMD.)*;
- Appendix 2d: Source Attribution, provides emissions information;
- Appendix 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process provides additional information on committee documents, meeting materials, and community engagement;
- Appendix 4: Enforcement History and Overview, includes an overview of authority, South Coast AQMD and CARB enforcement programs, and South Coast AQMD enforcement history;
- Appendix 5a: Ongoing Efforts, discusses ongoing efforts from government agencies as they relate to the air quality priorities;

- Appendices 5b through 5f, provides additional supporting information for their respective chapters and air quality priorities, including an overview of community impacts, emissions, and regulatory efforts;
- Appendix 7: California Environmental Quality Act (CEQA) Analysis, discusses the qualification of actions included in the CERP for exemptions under CEQA; and
- Appendix 8: Comments and Response to Comments, includes public comments to the SLA Preliminary Draft CERP and South Coast AQMD response.

Chapter 1

Introduction



Regulatory Background

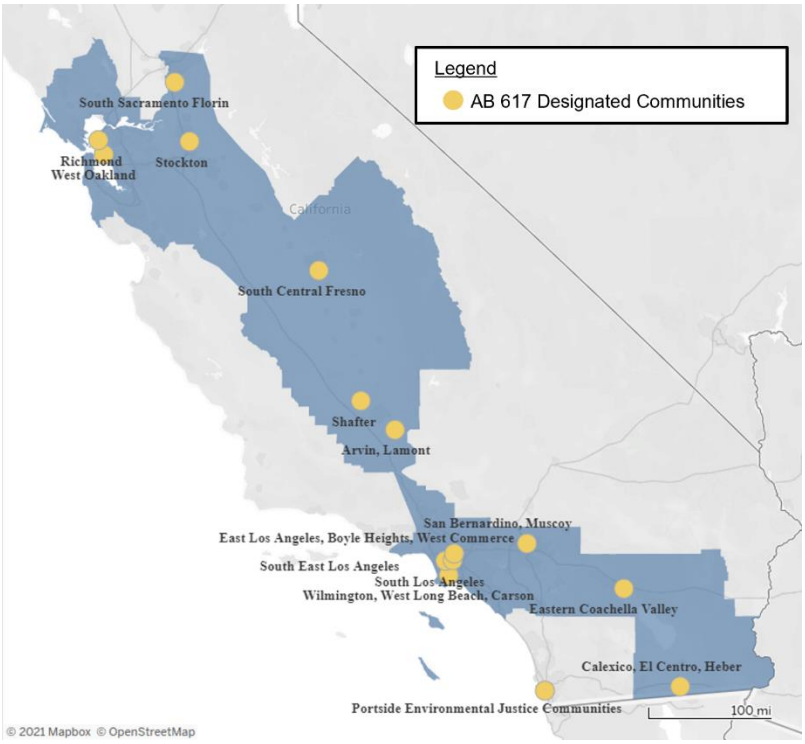
Assembly Bill 617 (AB 617)[1] was signed into California law on July 26, 2017, and focused on addressing disproportionate impacts of local air pollution in environmental justice (EJ) communities. "Environmental justice" is defined as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."[2] AB 617 was the companion measure to Assembly Bill 398[3] (E. Garcia), signed into law on July 25, 2017, which extended the California Greenhouse Gas Cap-and-Trade program, established pursuant to Assembly Bill 32[4] (Núñez, Pavley, Chapter 488, Statutes of 2006), until 2030. These bills followed Senate Bill 32[5] (Pavley, Chapter 249, Statutes of 2016) which requires CARB to ensure that statewide greenhouse gas emissions are reduced to at least 40 percent below the 1990 level by December 31, 2030.

AB 617 recognizes that while California has seen tremendous regional air quality improvement, some communities are still disproportionately impacted due to air pollution sources near residential areas. Major air pollution sources in EJ communities include mobile sources and industrial facilities. These communities also experience health, social, and economic disadvantages that add to their cumulative burdens. The AB 617 program invests resources and focuses on improving air quality in EJ communities. AB 617 communities are designated by California Air Resources Board (CARB), and they specify the plan(s) for the community as either an emissions reduction program, air monitoring system, or both. To meet the emissions reduction program requirements, South Coast Air Quality Management District (South Coast AQMD) develops and implements Community Emissions Reduction Plans (CERPs). For the air monitoring system requirements, South Coast AQMD develops and deploys Community Air Monitoring Plans (CAMPs). For communities with an emissions reduction program component, the local air district must develop a CERP in collaboration with CARB, community-based organizations, community members, affected sources, and local governmental bodies, which must be implemented within five years.[6] Additionally, air districts are required to provide an Annual Progress Report to CARB[7] and if new information becomes available, the CERP may be evaluated and revised by CARB. For communities with an air monitoring system component, a CAMP must be developed and deployed within one year of community designation.[8] An essential element of the program is partnership and collaboration with the community to address the community's air quality priorities and develop corresponding goals and actions in the CERP and CAMP. The Community Steering Committee (CSC) is a diverse group of people who live, work, own businesses, or attend school within the community. Additionally, local land-use agencies, public health agencies, regulatory agencies, and elected officials may have representation on the CSC. The CSC guides the development and implementation of the emissions reduction program and air monitoring system.

Assembly Bill 617 Designated Communities

Currently, statewide, there are 15 AB 617 communities designated by CARB (see **Figure 1-1**) and six of the 15 communities reside within the jurisdiction of the South Coast AQMD. In 2018 (Year 1), CARB designated three South Coast AQMD communities. In 2019 (Year 2), CARB designated two[9] additional communities in South Coast AQMD. On February 25, 2021 (Year 3[10]), South Los Angeles (SLA) was designated by CARB as an AB 617 community in South Coast AQMD to develop a community emissions program and an air monitoring system.[11,12]

Figure 1-1: AB 617 Designated Communities



[1] California Health and Safety Code, Section 44391.2
[2] California Government Code, Section 65040.12
[3] California Revenue and Taxation Code, Section 6377.1
[4] California Health and Safety Code, Section 38500
[5] California Health and Safety Code, Section 38566
[6] California Health and Safety Code, Section 44391.2 (b)(2)
[7] California Health and Safety Code, Section 42705.5 (d)
[8] California Health and Safety Code, Section 42705.5 (b)
[9] Eastern Coachella Valley and Southeast Los Angeles were designated in 2019 to develop both a community emissions program and air monitoring system, https://ww2.arb.ca.gov/capp-communities
[10] South Los Angeles is designated as a "2020" or "Year 3" community despite the CARB Board meeting for community selection being held in 2021, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/communities/south-los-angeles
[11] California Health and Safety Code, Section 44391.2 (c)(2)
[12] California Health and Safety Code, Section 42705.5 (d)

Assembly Bill 617 Program Challenges

Over the past four years of implementing the AB 617 program, South Coast AQMD has experienced challenges and gained insight on working with the designated communities and addressing their concerns. One of the common challenges for all AB 617 communities continues to be the emissions reduction program development timeline; one year to develop and adopt an emissions reduction program limits the ability to establish a relationship with the community, inform the community, and build consensus. Another challenge is the limited authority of air districts to sufficiently address all air quality related issues raised by the CSCs. Limited funding has also been challenging to sufficiently support the development, implementation, and deployment of community plans. South Coast AQMD is and continues to advocate for legislative changes on behalf of the community for more reasonable deadlines and increased and sustained funding for the AB 617 program.

Purpose

This CERP is developed to achieve emission and exposure reductions within the SLA community and address this community's air quality priorities, provide emissions and exposure reduction actions, and an implementation schedule (Chapter 5: Actions to Reduce Community Air Pollution). This plan also describes the community outreach conducted to develop this CERP (Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process) and an enforcement plan (Chapter 4: Enforcement Overview and History).

Community Emissions Reduction Plan Development Process and Emphasis on Community Engagement

Community engagement and input to inform both the process and the actions in a CERP are a primary element of the AB 617 program. Public meetings, subcommittee meetings, conversations, and communications among community co-leads, CSC members, community members, South Coast AQMD, and CARB contribute to developing and implementing this CERP. Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads and Chapter 3 describes the CSC, community co-leads, and outreach efforts for CERP development.

Community Designation and Community Emissions Reduction Plan Development Timeline

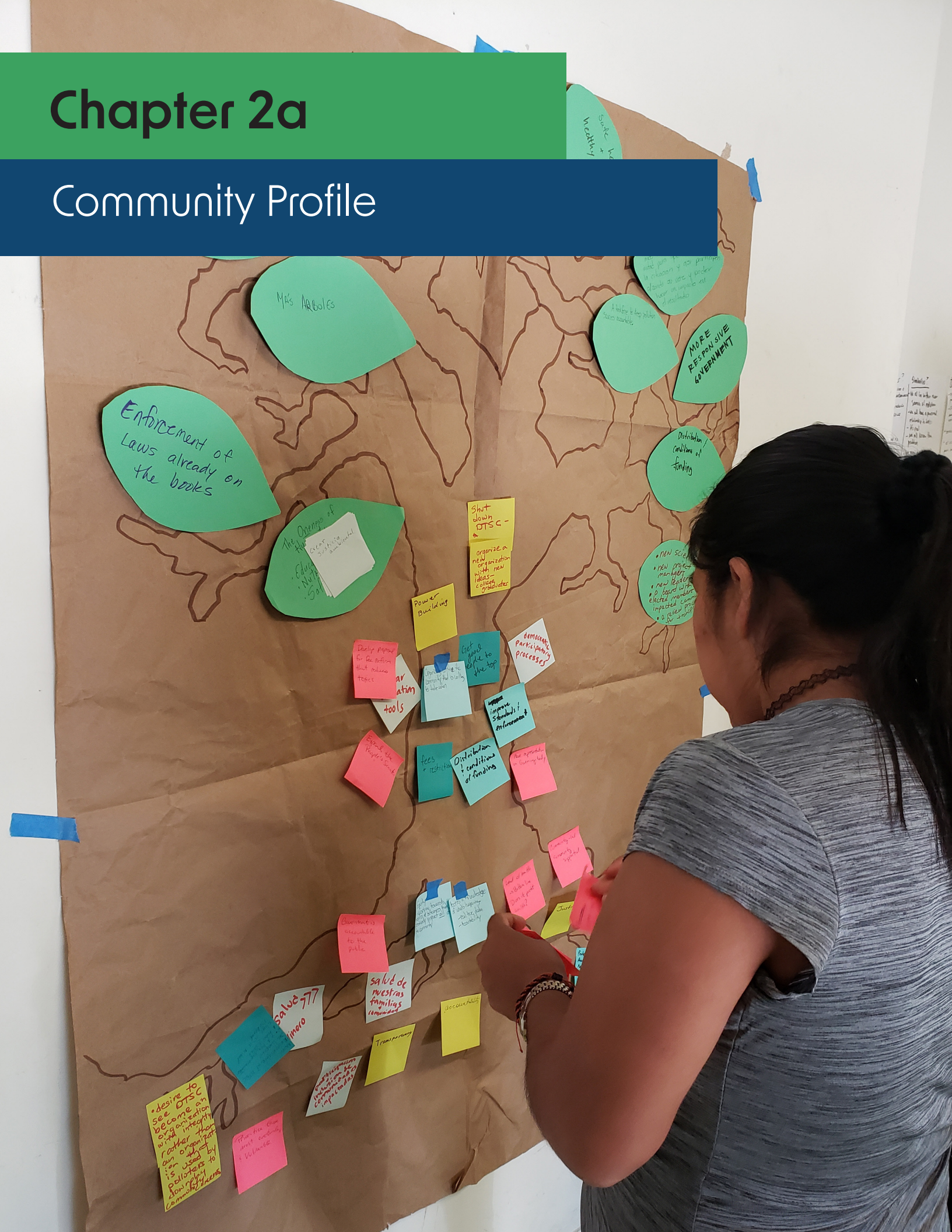
On January 14, 2021, South Coast AQMD and CARB initiated the first community meeting (Community Kick-off Meeting) in preparation for SLA's designation by CARB as an AB 617 community. Additionally, South Coast AQMD provided an overview of the agency, and South Coast AQMD and CARB presented information about the AB 617 program and explained the critical role of the CSC in the development and implementation of the CERP and CAMP. Due to the COVID-19 pandemic, all meetings were held virtually via Zoom. On February 16, 2021, Physicians for Social Responsibility-Los Angeles (PSR-LA) in collaboration with Strategic Concepts in Organizing and Policy Education (SCOPE) and Watts Clean Air and Energy Committee (WCAEC), South Coast AQMD, and CARB hosted a conference called "What's Up With the Air in South LA? An AB 617 Air Quality Virtual Conference". On February 25, 2021, SLA was designated by CARB as an AB 617 community. Since the designation, there have been a series of community meetings to develop the CERP and CAMP; see **Figure 1-2** for the timeline. On March 11, 2021, South Coast AQMD hosted the first official SLA CSC meeting, in collaboration with PSR-LA, SCOPE, and WCAEC who helped develop the agenda and prepare community members for meaningful engagement.

Figure 1-2: SLA Community Designation and CERP Development Timeline

January 2021	• First Community Meeting (Community Kick-Off Meeting)
February 2021	• "What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference" • CARB designated AB 617 Year 3 community
March - August 2021	• CSC Formation Meeting • CSC developed • Community boundary finalized • Air quality priorties identified • CERP development began
September 2021 - February 2022	• Community subcommittees on air quality priorities and emissions inventory • CERP development extension request submitted • CSC discussion on potential draft CERP actions
March 2022	• Preliminary Draft CERP released to CSC for review • CERP and CAMP workshops
April 2022	• Draft CAMP released to CSC for review • CERP and CAMP updates
May 2022	• Draft CAMP and Monitoring Working Team meeting updates • Discussion on updates to the Preliminary Draft CERP based on 10 comment letters received

Chapter 2a

Community Profile



Introduction

This chapter describes the South Los Angeles (SLA) community boundary and its characteristics.

Assembly Bill 617 Program Topics

During monthly Community Steering Committee (CSC) meetings, community co-leads, CSC members, community members, California Air Resources Board (CARB), and South Coast Air Quality Management District (South Coast AQMD) worked together to shape the elements and actions of this Community Emissions Reduction Plan (CERP). Topics discussed with the CSC included:

- How should the community boundary be defined?
- What air quality concerns does the community have?
- What are the top air quality priorities that the community would like to address through this CERP?
- What should the goals for the air quality priorities include?
- What priority actions should be included in this CERP?
- Does the CSC have additional feedback on the Preliminary Draft CERP?

Community Boundary

The community boundary to represent the SLA community selected by CSC members is important as it will be the area of focus for the community plans (CERP and Community Air Monitoring Plan (CAMP)) (**Figure 2a-1** and **Figure 2a-2**). The SLA community boundary focuses on places in the community where residents live, work, attend school, and spend most of their time.

Figure 2a-1 shows the area of South Coast AQMD's jurisdiction and the location of the SLA community within those boundaries. **Figure 2a-2** shows the SLA boundary which includes the following areas in whole or in part: Adams-Normandie, Athens, Baldwin Park, Broadway-Manchester, Central-Alameda, Chesterfield Square, Compton, Crenshaw, Exposition Park, Florence, Gramercy Park, Historic South-Central, Jefferson Park, Leimert Park, Lynwood, Manchester Square, South Park, Vermont Square, Watts, West Adams, the unincorporated areas of Westmont and Willowbrook, and parts of Inglewood and Los Angeles.

Figure 2a-1: Location of the SLA Community within South Coast AQMD

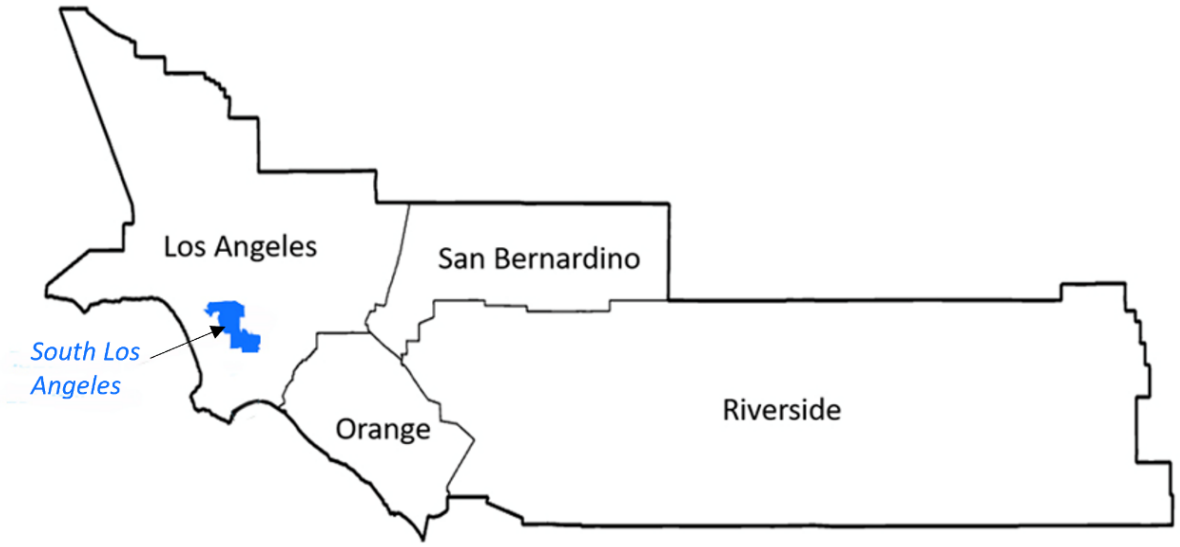
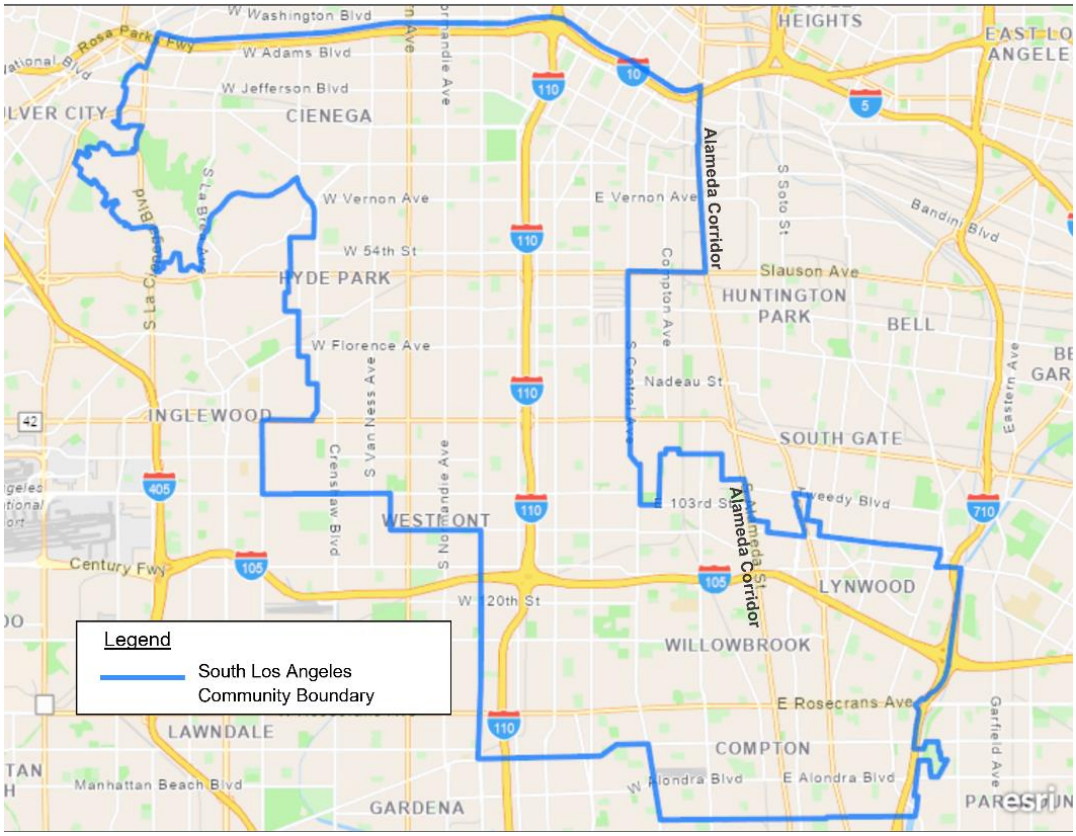


Figure 2a-2: SLA Community Boundary



Air Quality Priorities

After finalizing the community boundary, the CSC discussed their air quality concerns and identified a set of air quality priorities. The CSC built consensus to determine the top air quality priorities and the actions necessary to address them. Based on input, the top air quality priorities for the SLA community are:

- Mobile Sources,
- Auto Body Shops,
- General Industrial Facilities,
- Metal Processing Facilities, and
- Oil and Gas Industry.

The actions to address each air quality priority are described in Chapter 5: Actions to Reduce Community Air Pollution and Appendix 5: Actions to Reduce Community Air Pollution provides supporting information for each air quality priority. Additional CSC-identified pollution concerns are not included as air quality priorities in this CERP, as they were not prioritized by the CSC or South Coast AQMD does not have sole or direct authority to address these concerns. These concerns include fireworks, airplane exhaust, worker exposure, noise pollution, illegal dumping, volume of facilities in the community, hazardous waste disposal, water and soil contamination, and chemical cargo transported on trains. South Coast AQMD does not have sole or direct authority to address certain sources of pollution and/or environmental hazards; other government agencies, such as the United States Department of Labor Occupational Safety and Health Administration (OSHA), Department of Toxic Substances Control (DTSC), city or county fire departments, and city or county planning agencies. South Coast AQMD recognizes the burdens that residents of SLA shoulder because of poverty, lack of economic and educational opportunities, illegal dumping, excessive noise, and the other concerns identified by the CSC. Although some of these current conditions are described in Chapter 2a and are part of the cumulative burden in the SLA community that are linked to air pollution, they are generally outside of the scope for the CERP. However, South Coast AQMD believes there is value in collaborating with other agencies and this CERP has several actions which commit South Coast AQMD and CARB to collaboration with other agencies. For more information regarding these concerns, please refer to Appendix 5d: General Industrial Facilities.

Community Demographics Profile

According to the 2010 Census, approximately 904,000 people live within the SLA boundary: approximately 68 percent are Hispanic or Latino, 26 percent are African American, and 2.9 percent are White (**Figure 2a-3**).[1] Sensitive receptors are young children (under 10 years old) and

[1] Definitions of races are the same as version 4.0 of the California Communities Environmental Health Screening Tool (CalEnviroScreen 4.0), https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40

older adults (over 65 years old) and can be more sensitive to air pollution's health effects. The population in this community is younger than the average California population, with about 14.8 percent of children under the age of 10 years and 9.2 percent adults over the age of 65 years versus the state which has 12.5 percent and 14 percent, respectively (**Figure 2a-4**).

Figure 2a-3: Population by Race/Ethnicity in SLA and the State of California, based on 2010 Census

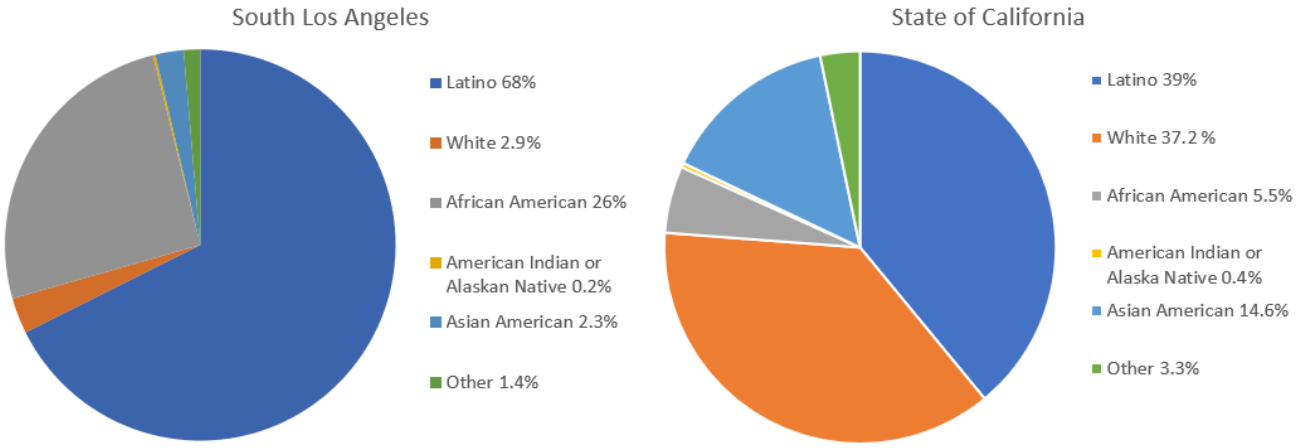
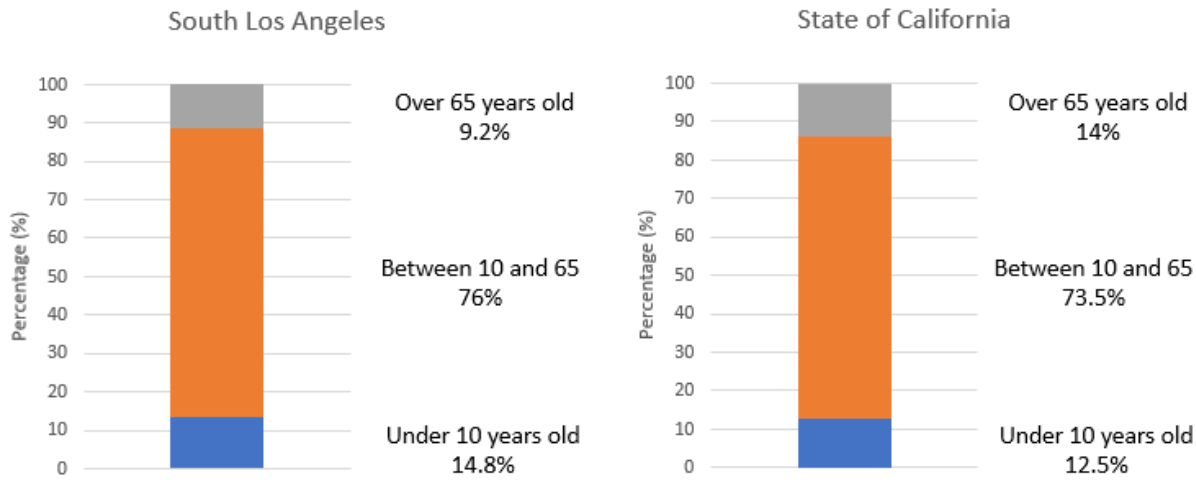


Figure 2a-4: Age Profile in SLA and the State of California, based on 2010 Census

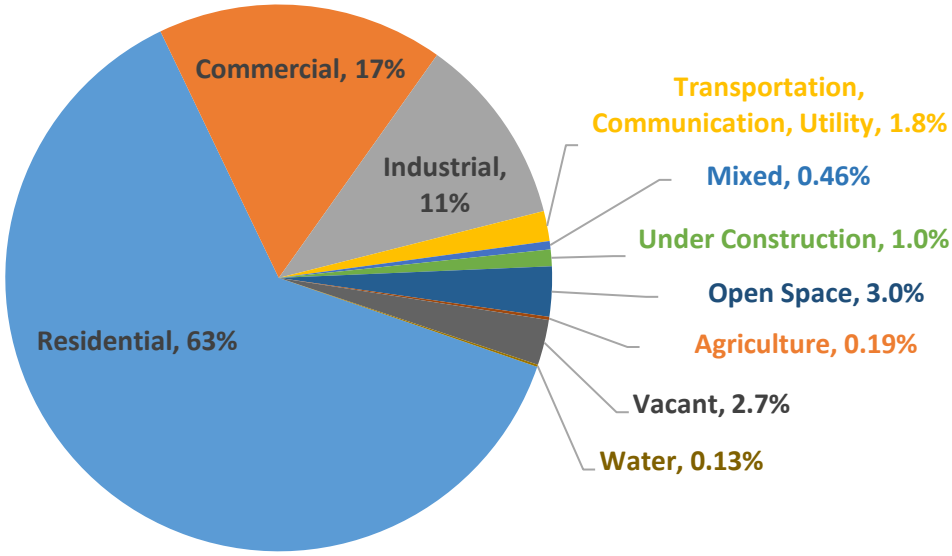


Community Land Use Profile

The SLA community boundary includes a land area of 63.5 square miles; about 63 percent of this land area is used for residential living, 17 percent is zoned for commercial uses, 11 percent is

zoned for industrial uses, and 1.8 percent is used for freeways, roadways, and utilities and communications services (**Figure 2a-1**).[2]

Figure 2a-1: Land Use Profile in SLA*



* Values do not sum to 100% due to rounding.

Community Profile from the Community Perspective

While this subchapter provides an overview of the SLA community, the community members make this community unique and distinct. Community members bring intimate familiarity with their community and the air quality concerns that affect their neighborhood. Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, Chapter 2c: Just Transition as Presented by the Community Co-Leads, and Appendix 2b: Environmental Justice Timeline as Presented by the Community Co-Leads are primarily written by the community co-leads to ensure the community directly provides their perspective. *(Disclaimer: The views and opinions expressed in Chapters 2b and 2c and Appendix 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast AQMD.)*

[2] Land use refers to how certain areas of land are classified for development and use. Land use data is often used for city or county planning, such as the placement of housing developments and transportation hubs. Land use data is derived from the 2016 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy, which is based on 2012 data.

Chapter 2b

Community Profile and CERP Development as Presented by the Community Co-Leads

Disclaimer: The views and opinions expressed in Chapter 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air Quality Management District (South Coast AQMD).

Introduction

Disclaimer:
The views and opinions expressed in Chapter 2b are those of the South Los Angeles community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air Quality Management District.

This chapter is primarily written by the community co-leads and describes their role in the development of this Community Emission Reduction Plan (CERP) and the characteristics of South Los Angeles (SLA) from the perspective of the community. Additionally, this chapter includes quotes from community members describing their perspective.

Community Co-Leads

For this community, South Coast Air Quality Management District (South Coast AQMD) used a community co-lead model to establish a shared leadership structure for development of this CERP. Community co-leads worked with South Coast AQMD to plan agendas for the CSC meetings, develop the structure of the CSC meetings, develop and present materials at CSC meetings, and co-lead the CSC meetings with South Coast AQMD. This approach provided a community driven process and an opportunity to collaborate with community representatives in the planning and development of the CERP and Community Air Monitoring Plan (CAMP).

The three community co-lead organizations are: Physicians for Social Responsibility-Los Angeles (PSR-LA), Strategic Concepts in Organizing and Policy Education (SCOPE), and Watts Clean Air and Energy Committee (WCAEC). PSR-LA, SCOPE, and WCAEC's have a track record of success of over 20 years of experience in working in SLA organizing, building relationships, and advocating for solutions to the ongoing health threats linked to environmental justice issues in the community. Details of each community co-lead organization is provided in Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process.

Assembly Bill 617 (AB 617) Program

AB 617 creates an additional opportunity for air districts to work closely with communities to better understand the air quality issues and the prioritization of those issues that are unique to their community. The community co-lead process further allows for communities to be empowered and to lead and provide direct input and guidance on actions needed to address air quality issues. The program refocuses resources on improving air quality at the local level in environmental justice communities and creates a direct and streamlined process for regulatory agencies to work with communities to develop solutions. With respect to the program, the community co-leads listed the following challenges:

- Organizational changes,
- Constrained timeline and capacity gaps,
- Communication and process transparency,
- Accountability, and
- Lack of resources that adequately supports community co-lead engagement.

California Air Resources Board Assembly Bill 617 Community Designation

After years of historical advocacy and recent organizing efforts led by PSR-LA and community-based organizations such as SCOPE and WCAEC through their Community Air Protection Project South Central Los Angeles Project to Understand the Sources and Health Impacts of Local Air Pollution (SCLA-PUSH), South Coast AQMD Governing Board approved the recommendation that SLA be selected for the AB 617 program. SLA was selected as an AB 617 community by the California Air Resources Board (CARB) at their meeting on February 25th, 2021, for both a CERP and a CAMP.

Through a community visioning and planning process, SCLA-PUSH project members, SLA organizations, and residents started working together to produce a roadmap for achieving the transformation of SLA's air, primarily through creative technology solutions and innovation rooted in a Just Transition framework.

This major success would not be possible without the support of our SCLA-PUSH project and their dedicated community-based organizations, experienced community members and air quality ambassadors, who are now leading and forming the SLA CSC.

Community Co-Leads and Community Emissions Reduction Plan Development

Formation of the CSC

At the first community meeting (Community Kick-off Meeting) held virtually on January 14, 2021, collectively the community co-leads organized a total of 50 community residents to attend this meeting, so community members could learn about the next steps in the SLA AB 617 official selection.

The community co-leads developed a community outreach strategy to recruit community members and establish the SLA CSC. The community co-leads brought a wealth of community contacts and active civic leadership to the outreach work and leveraged their existing relationships in the community.

PSR-LA's Community Air Protection SCLA-PUSH project in the community had already established community leaders, which ensured the outreach process was successful because of their

reputations and hard work. Many of the SLA CSC members are PSR-LA's SCLA-PUSH trained SLA air quality ambassadors.

Community co-leads also leveraged existing relationships within SLA to bring in community leaders to the CSC. Community partnerships to establish the CSC included:

- Esperanza Community Housing
- Standing Together Against Neighborhood Drilling-LA (STAND-LA)
- Watts Rising
- Brotherhood Crusades
- Slate Z
- Strategic Actions for a Just Economy (SAJE)
- Holman United Methodist Church
- Redeemer Community Partnership

Community co-leads know that the SLA community has a rich history of organizing and mobilizing for social justice and that collaborations among community-based organizations are imperative to ensure inclusivity of all what SLA is. These partnerships enabled expanded outreach and recruitment for the CSC. In addition, these organizations now have representatives in the SLA CSC and bring community expertise ranging from housing justice, transportation justice, environmental justice, community organizing, and civic leadership.

Community Boundary

It is important to note that SLA community boundaries have historically been established by city jurisdictions, and do not reflect the residents' own conception of their community. By community standards, SLA also includes the communities of Watts, Compton, Lynwood, Leimert Park, Crenshaw, Jefferson Park, West Adams, Athens, Westmont, and Willowbrook. The SLA community boundaries are intersected by high volume highways including the Interstate 10 (I-10), Interstate 105 (I-105), Interstate 110 (I-110), Interstate 405 (I-405), and State Route 91 (SR-91). Additional details of the SLA community boundaries are discussed in Chapter 2a: Community Profile.

Community Co-Leads and Community Meetings

Community Meeting Challenges

Due to the COVID-19 pandemic, all meetings were held virtually via Zoom. For the community members, in addition to the ongoing pandemic impacts, these virtual meetings posed further challenges such as, digital divide, zoom fatigue, and South Coast AQMD organizational change. Community co-leads and South Coast AQMD discussed the challenges of meeting virtually and that in-person interactions provide greater opportunities to connect and communicate with each other. South Coast AQMD appreciates and acknowledges the work with the community co-leads

and the community to have worked to continue to meet and to develop the CERP and CAMP recognizing the impacts and effects of the pandemic.

What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference[1]

There were over 100 attendees which included more than 60 community members, academic partners, city officials from Los Angeles Sanitation, Los Angeles Department of Health, and Los Angeles planning department, regulatory agencies representatives and board members from CARB and South Coast AQMD. The conference was held so community members in SLA could learn about Air Quality in SLA and the opportunity that AB brings to address air pollution and create spaces for meaningful community engagement. During this conference there was an opportunity for community members to directly ask questions to the regulatory agencies CARB and South Coast AQMD. Additional details of this conference are in Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process.

Community Engagement and Outreach

Through SCLA-PUSH training and outreach capacity, PSR-LA has outreached to at least 100 community members in addition to leveraging existing relationships with community-based organizations to keep them informed.

In addition to the SCLA-PUSH project, WCAEC has leveraged other work to represent the whole of community with relative items such as water, soil, agriculture, education and workforce development, capacity building, etc., to attempt an exhaustive effort of community engagement which covers the entire SLA CSC boundary.

Hierarchy of Controls

One of the tools that the community co-leads used to increase engagement was the Hierarchy of Controls. The Hierarchy of Controls is a strategy to determine control methods for mitigating exposure to hazards. The concept of this hierarchy is that the most effective controls are at the top and are in order of decreasing effectiveness.[2] The community co-leads used the Hierarchy of Controls (

Figure 2b-1) to determine air pollution solutions effectiveness in terms of individual and community protection.[3] **Table 2b-1** provides an overview of the hierarchy actions as described by the community co-leads. Additional community engagement tools used by South Coast AQMD and the community co-leads are discussed in Chapter 3.

[1] PSR-LA, What's Up With the Air in South LA? An AB617 Air Quality Conference, https://www.youtube.com/watch?v=UpSAvGSqpSY

[2] The National Institute for Occupational Safety and Health, Hierarchy of Controls, https://www.cdc.gov/niosh/topics/hierarchy/default.html

[3] South Coast AQMD, AB 617 South Los Angeles Community Steering Committee, December 2, 2021, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-dec2-2021.pdf

Figure 2b-1: Hierarchy of Controls

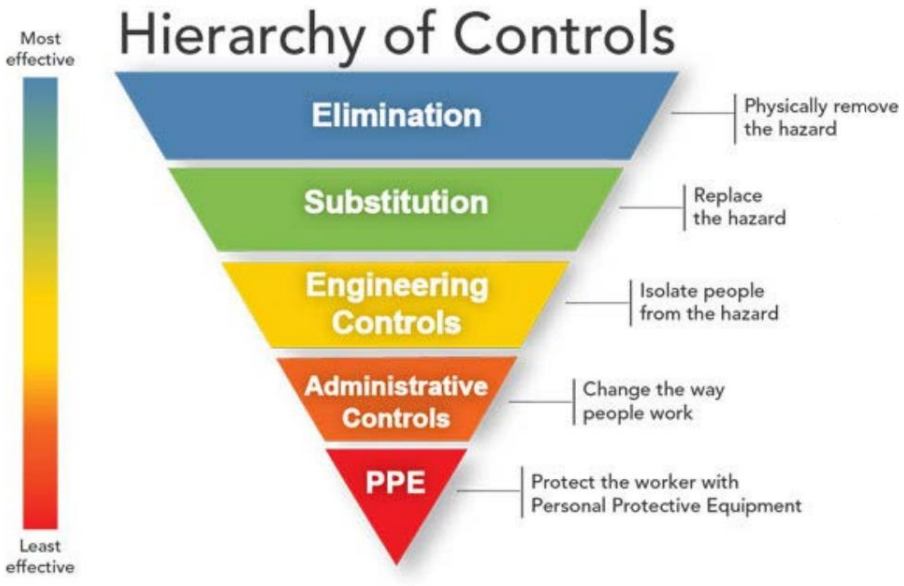


Table 2b-1: Overview of the Hierarchy of Controls

Action	Description	Application
Elimination	Physically remove the hazard	The top of the pyramid is the most effective action we or an organization can take – removing the hazard or risk from the community. If we eliminate the hazard (for example, prevent industries from polluting), we don't need any other actions to control that hazard.
Substitution	Replace the hazard	Substitution can also be highly effective – for example with cleaning products, replacing harsh chemicals with homemade solutions – but challenging to find an appropriate and safer alternative.
Engineering Controls	Isolate people from the hazard	As we go down the pyramid, the actions are less effective at controlling the hazard and preventing harm. Engineering controls are usually mechanical solutions to prevent the hazard or toxin from reaching people – in a workplace, this might be a physical barrier to keep chemicals away from workers. In a community setting, it could be a fence around a construction site or land use restrictions.
Administrative Controls	Change the way people work	The controls at the bottom of our pyramid are both the least effective actions and also put the most burden on the individual instead of the organization.
Personal Protective Equipment (PPE)	Protect the worker with PPE	Personal protective equipment might be a hard hat at a construction site or gloves in a laboratory.

Meeting Facilitator

The community co-leads, in collaboration with South Coast AQMD, selected Castillo Consulting Partners (CCP) to support CSCs meetings. The facilitator is a neutral party that provides an essential role to help bring the community co-leads and South Coast AQMD together ensuring all voices are heard and that both entities are sharing the leadership roles. Having neutral facilitation fostered inclusivity and full participation by community members. The facilitators also structured each meeting to include a question-and-answer period to encourage public comments throughout the planning process. In addition, the facilitators guided the CSC toward consensus on the CERP.

The public voice should be recorded and considered whether a CSC member or not. CCP approaches all of the CSC meetings facilitation through a community-driven lens, which requires

being prepared to engage in restorative practices, as needed, and proactively seek out ways to minimize or prevent power imbalances and enhance community participation.

Air Quality Priorities

Chapter 5c: Auto Body Shops

PSR-LA through their ground-truthing efforts and community data collected suggested that facilities-of-concern may be underestimated because these facilities are at times misidentified, misclassified, or simply missing in official databases. To address this data set challenge, PSR-LA conducted a rigorous data vetting process that included a detailed review of South Coast AQMD facilities classifications, virtual Ground-Truthing Walks, and Google Map searches of existing facilities to identify missing or misclassified facility data. The vetting process undertaken by PSR-LA revealed that approximately 20 facilities-of-concern that were classified under North American Industrial Classification Codes (NAICS) by South Coast AQMD that did not appear accurate. Out of the 11 "unclassified facilities," three were undoubtedly auto body shops (i.e., Hello Auto Body, Jimenez Body Shop, and Fine Line Body Shop, INC). Data collected by community co-leads also identified non-permitted auto body facilities. Please see Chapter 5c for more details on how South Coast AQMD classifies facility types.[4]

Chapter 5d: General Industrial Facilities

As perchloroethylene was being phased out based on South Coast AQMD and CARB regulatory programs, dry cleaners selected other dry cleaning alternatives. One of the options dry cleaners selected was hydrocarbons, which has volatile organic compound emissions. Many small dry cleaners owned by mostly immigrants and people of color have switched to this alternative. CARB has classified professional wet cleaning and carbon dioxide dry cleaning alternatives as meeting the criteria as non-toxic and non-smog forming alternatives based on their relatively benign human health, environmental, and physical property hazard profile. This was identified as a concern by the CSC. Details for this air quality priority can be found Chapter 5d and Appendix 5d: General Industrial Facilities.

Drivers of Disparity

Developed with the input of over 30 community organizations and institutions and 125 resident leaders, South Los Angeles Building Health Communities Collaborative developed South Central Rooted, a resource that outlines a framework exploring four intersecting root causes or "drivers" of disparity in South Central Los Angeles. The four drivers include:

1. Gentrification, displacement, and homelessness,

[4] From Chapter 5c, "South Coast AQMD utilizes multiple methods to classify facility types including the NAICS, a key data source for the information in this CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code), to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which team conducts the inspection for each facility, which is directly tied to the TS-Code."

2. Poverty, disinvestment and joblessness,
3. Policing, suppression, deportation, and mass incarceration, and
4. Environmental racism.

While we provide the following context, an excerpt from the South Central Rooted report, around environmental racism, we recognize that environmental racism operates in conjunction with the other drivers of disparity.

"Across California, communities of color are exposed to pollution and environmental hazards at a higher rate than their White counterparts. A 2018 report from California's Office of Environmental Health Hazard Assessment estimated that 1 in 3 African American residents and 1 in 3 Latinx residents live in one of the top 20% most polluted census tracts in the state, while only 1 in 14 White residents live in these areas.[5] These statistics are indicative of the role race plays in determining the location of unwanted land uses, like power plants and landfills. This pattern also stems from a systemic lack of access to planning, land use, and environmental regulatory decision-making processes for low-income communities of color.[6] National and regional studies, including a recent analysis of racial disparities in the built environment in Los Angeles County, point to a link between low rates of civic engagement and poor environmental quality.[7] [8] [9] As a result, the highest risk of pollution and environmental disaster is assigned to Black and Brown communities.[10]"

"However, poor neighborhoods and people of color are not only more exposed to environmental hazards, but they are also more vulnerable to their impacts due to external risk factors resulting from socioeconomic conditions.[11]Furthermore, research demonstrates that as climate change exacerbates air pollution and the health hazards associated with it, these same communities

[5] Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. (2018). Analysis of race/ethnicity, age, and CalEnviroScreen 3.0 scores. Retrieved from https://oehha.ca.gov/media/downloads/calenviroscreen/document calenviroscreen/raceageces3analysis.pdf

[6] Schweizer, E. (1999, July). Environmental justice: an interview with Robert Bullard. EarthFirst! Journal. Retrieved from https://www.ejnet.org/ej/bullard.html

[7] Pastor, M., & Morello-Frosch, R. (2014). Integrating public health and community development to tackle neighborhood distress and promote well-being. Health Affairs, 33(11), 1890-1896. doi: 10.1377/hlthaff.2014.0640

[8] Cushing, L., Morello-Frosch, R., Wander, M., & Pastor, M. (2015). The haves, the have-nots, and the health of everyone: the relationship between social inequality and environmental quality. Annual Review of Public Health,36, 193-209. doi: 10.1146/annurev-publhealth-031914-122646

[9] Race Counts. (2018). Los Angeles County ranks the 28th most racially disparate county in California. Retrieved from http://www.racecounts.org/county/los-angeles/

[10] Shankar, M. (2014, November 14). Land use in South L.A.: a legacy of environmental crime. KCET. Retrieved from https://www.kcet.org/shows/departures/land-use-in-south-la-a-legacy-of-environmental-crime

[11] Faust, J., August, L., Bangia, K., Galaviz, V., Leichty, J., Prasad, S., Schmitz, R., Slocombe, A., Welling, R., Wieland, W., & Zeise, L. (2017). CalEnviroScreen 3.0 update to the California Communities Environmental Health Screening Tool. Retrieved from Office of Environmental Health Hazard Assessment website: https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf

stand to face even greater health impacts.[12] At the same time, low-income communities and communities of color often lack the adequate investment in infrastructure needed to mitigate pollution exposure and protect community health, such as clean energy technologies and green space."

"South LA has a history of activism around noxious land uses. In one prominent example, a group of predominantly African American women overcame significant industry opposition to prevent the City of Los Angeles from locating a waste-to-energy incinerator in South LA.[13] In a similar grassroots-led victory, a South LA immigrant mother led the fight to relocate Palace Plating, a metal finishing facility generating hazardous waste across the street from one of the largest elementary school campuses in the nation. South LA students, teachers, and families were the determining factor in forcing city government and state regulators to take action after years of testing and fines resulted in little improvement.[14] These examples underscore the role of community voices and grassroots organizing power in securing environmental justice wins, but also point to the need for monitoring these wins, while continuing to push for upstream policy solutions that advance long-term systems change.[15]

Environmental Issues Outside of Scope of the CERP

The CSC also identified sources of pollution and other environmental hazards that are not included in this CERP's SCOPE. The CERP does not study or attempt to address the background or regional sources of pollution that all SLA communities face. The CERP also does not seek to address the burdens that residents of SLA shoulder because of poverty, lack of economic and educational opportunities, illegal dumping, excessive noise, although some of these current conditions are described in Chapter 2a and are part of the cumulative burden in the SLA community that are linked to air pollution. Chapter 2a, section "Air Quality Priorities," includes a discussion regarding CSC-identified pollution concerns that are not included as air quality priorities. For more information regarding these concerns, please refer to Appendix 5d: General Industrial Facilities.

[12] Morello-Frosch, R., Pastor, M., Sadd, J., & Shonkoff, S. B. (n.d.). The climate gap: inequalities in how climate change hurts Americans & how to close the gap. Retrieved from http://dornsife.usc.edu/assets/sites/242/docs/ClimateGapReport_full_report_web.pdf

[13] Matsuoka, M. (2012, November 8). LA's history lesson on environmental justice and waste. The Huffington Post. Retrieved from https://www.huffingtonpost.com/martha-matsuoka/los-angeles-recyclying_b_2092706.html

[14] Gold, S. (2009, December 22). A good move for South L.A. neighborhood. Los Angeles Times. Retrieved from http://articles.latimes.com/2009/dec/22/local/la-me-southla-metal22-2009dec22

[15] Pastor, M., & Morello-Frosch, R. (2014). Integrating public health and community development to tackle neighborhood distress and promote well-being. Health Affairs, 33(11), 1890-1896. doi:10.1377/hlthaff.2014.0640

South Los Angeles History and Background

Air pollution in SLA emanates from a variety of sources, both stationary and mobile. Nestled among residential homes, schools, recreational facilities, houses of worship and commercial establishments are auto body shops, metal manufacturing facilities, oil and gas extraction sites, chemical plants and other industrial land sites. Freeways and high-volume thoroughfares surround and crisscross this urban landscape. These pollution sources regularly emit harmful air pollutants and particles, often above regulatory health standards, when combined with other socio-economic and environmental determinants of health, significantly impact the health and well-being of SLA residents.

SLA is the traditional land of the Tongva and Gabrielino peoples, original caretakers of the Tongva land (The LA Basin). SLA is a historic Black community that has a rich history shaped by immigration, shifts in labor markets, and housing policy that have led to economic displacement and gentrification. Social forces, discriminatory practices such as redlining and environmental racism, immigration, changing heritage, and community fights for justice have shaped the broader narrative of SLA. The SLA community is now predominantly Black and Brown and low-income with a variety of backgrounds and stories.

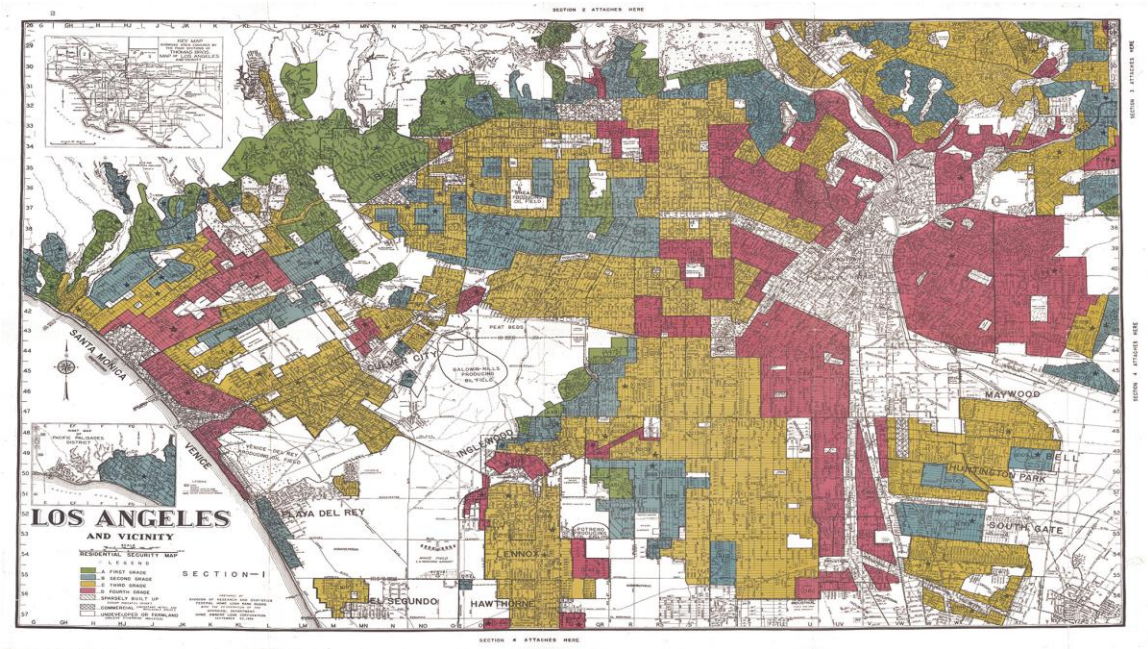
History of Redlining in South Los Angeles

Early 20th century: Discriminatory real estate practices such as redlining cemented a pattern of exclusionary development that allowed for White home ownership in suburban neighborhoods of Los Angeles, while concentrating industrial activity in non-White and immigrant neighborhoods, including in and around SLA (**Figure 2b-2**). During this time of rapid growth, several national firms established plants: Goodyear, Firestone, Phelps Dodge, and U.S. Steel. These environmental racist planning practices left a legacy of staggering environmental health and justice problems that are impacting the community on a daily basis, including the co-location of industrial facilities, continued oil extraction, poor air, contaminated land, and poor urban infrastructure. Today, the SLA community continues to battle ongoing environmental injustices, while demonstrating tremendous power through impactful activism and community-wide mobilizations. The following timeline of the history that led up to the launch of AB 617 reflects the legacy of poor air quality and environmental racism and the energetic and impactful SLA movement.

Please refer to Appendix 2b: Environmental Justice Timeline as Presented by the Community Co-Leads for a timeline that reflects the two sides of the environmental justice struggle: the legacy of poor air quality and environmental racism on the one hand, and energetic and impactful movement building on the other.[16]

[16] SCLA-PUSH, A Report on the First Phase of Air Quality Assessment in South Central Los Angeles, 2019-2020, https://www.psr-la.org/wp-content/uploads/2020/09/SCLA-PUSH-Final-Report-2019-2020.pdf

Figure 2b-2: Consequences of Redlining in SLA



South Los Angeles Today

SLA is home to more than half a million people in about 30 square miles of land. These communities face multiple, synergistic and cumulative stressors, and hazardous exposures that, when combined with existing vulnerability, lead to adverse health consequences.

Population Characteristics[17]

Approximately 40% Black or African American and 60% Non-Black and Black Hispanic or Latino live in this predominantly low-income community.

Air Quality Profile

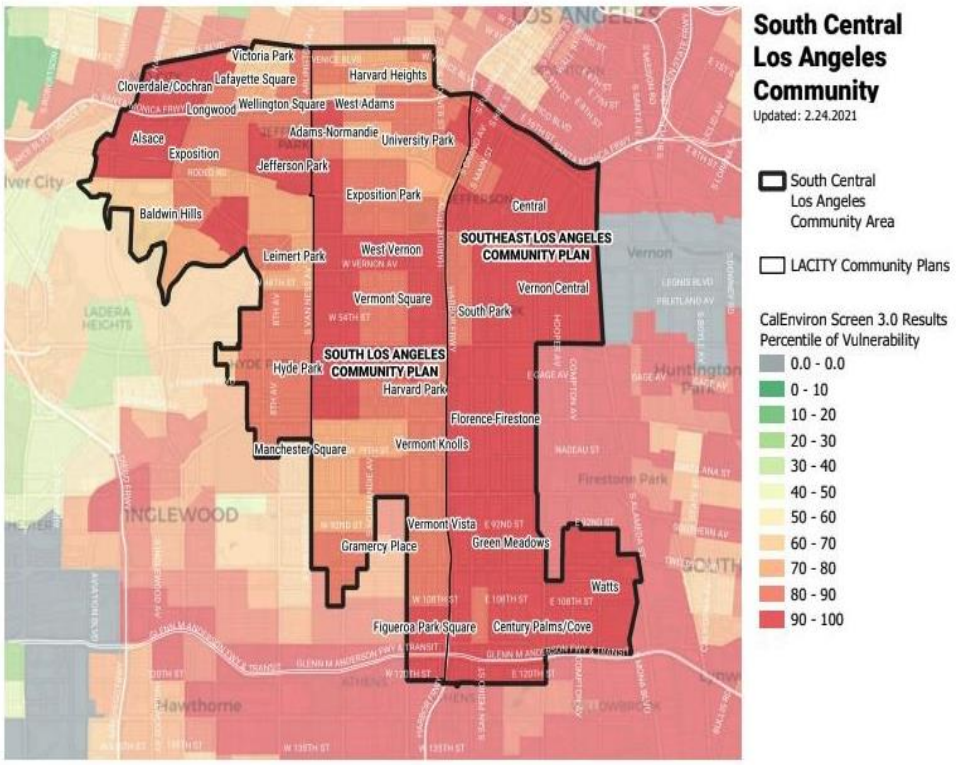
South Central Los Angeles communities are breathing some of the most polluted air in California and the country (**Figure 2b-3**). Approximately half of census tracts in the community score in the 93rd percentile for Particulate Matter 2.5, and the remaining score in the 82nd percentile. The majority of the community scores in the 79th percentile for diesel and 53rd percentile for ozone.[18] While state databases, alongside numerous studies, reveal the presence of all six criteria air pollutants regulated by the U.S. EPA in South Central LA (i.e., particulate pollution, ground-level ozone, lead, carbon monoxide, nitrogen oxides and sulfur oxides). SLA census tracts

[17] City of Los Angeles - Department of City Planning, South Los Angeles Demographic Profile, https://planning.lacity.org/odocument/40f63808-92b4-4c1e-8a10-ed1d46a37ae5/2017_demo_profile_south_la.pdf

[18] California Office of Environmental Health Hazard Assessment, CalEnviroScreen, Indicators Overview, https://oehha.ca.gov/calenviroscreen/indicators

consistently and overwhelmingly score in the top five to 10 percent of the most vulnerable communities, according to CalEnviroScreen 3.0.

Figure 2b-3: SCLA-PUSH CalEnviroScreen 3.0



Community Land Use Profile

Air quality is intrinsically linked to land-use patterns where the designation of land often dictates the type of industry located there. Historically, city planning did not prioritize the separation of hazardous land uses from sensitive populations. As such, the result is clusters of incompatible land uses that are disproportionately concentrated in South LA. In 2013, more than 21,000 SLA residents lived within 500 feet of a major truck route and other unwanted land uses, such as manufacturing, oil refining and chemical plants.

Community Voices

Below are several quotes from community co-leads and CSC members:

"To transform the legacy environmental racism in the community of SLA, we must focus on delivering real emissions reductions and aim at moving upstream policy solutions that prioritize improving the quality of lives for South Los Angeles residents, we must also transform the pactices of the agencies meant to clean our air.

- Martha Dina Arguello, Physicians for Social Responsibility-Los Angeles (PSR-LA)

"Climate change is real and the sooner we incorporate citizen science and engagement, coordinated strategies and inclusive timelines and efforts across intergovernmental relations and communication, and fill the gaps of process, technology and access to ground truthing and resources that mirror best practice, only then will communities become a healthy biodiverse ecosystem where the human right to breath air can live and increase the quality of life for residents."

- Jacquelyn Badejo, Watts Clean Air and Energy Committee

"My community is in jeopardy of extinction. Our children are experiencing health disparities at an alarming rate. Governmental agencies are always testing, running experiments in our neighborhoods, and not providing solutions to the issues that are discovered. Just giving themselves ammunition for the next grant opportunity. Our lives are not valued. It's always about the quick fix or finding room for the next band aid. Environmental Justice advocacy has turned into one big joke for the systemic systems that are ingrained into society. Lord help us! Just tired of our community being lab rats."

- Linda Cleveland, Watts Clean Air and Energy Committee

"The South Los Angeles community should have the opportunity to breathe clean free air. So as a resident, a business, and a church, we have the responsibility to clear the air. Let's live futuristic in a healthier and safe environment."

- Pastor Patricia Strong-Fargas, Resident of South Los Angeles

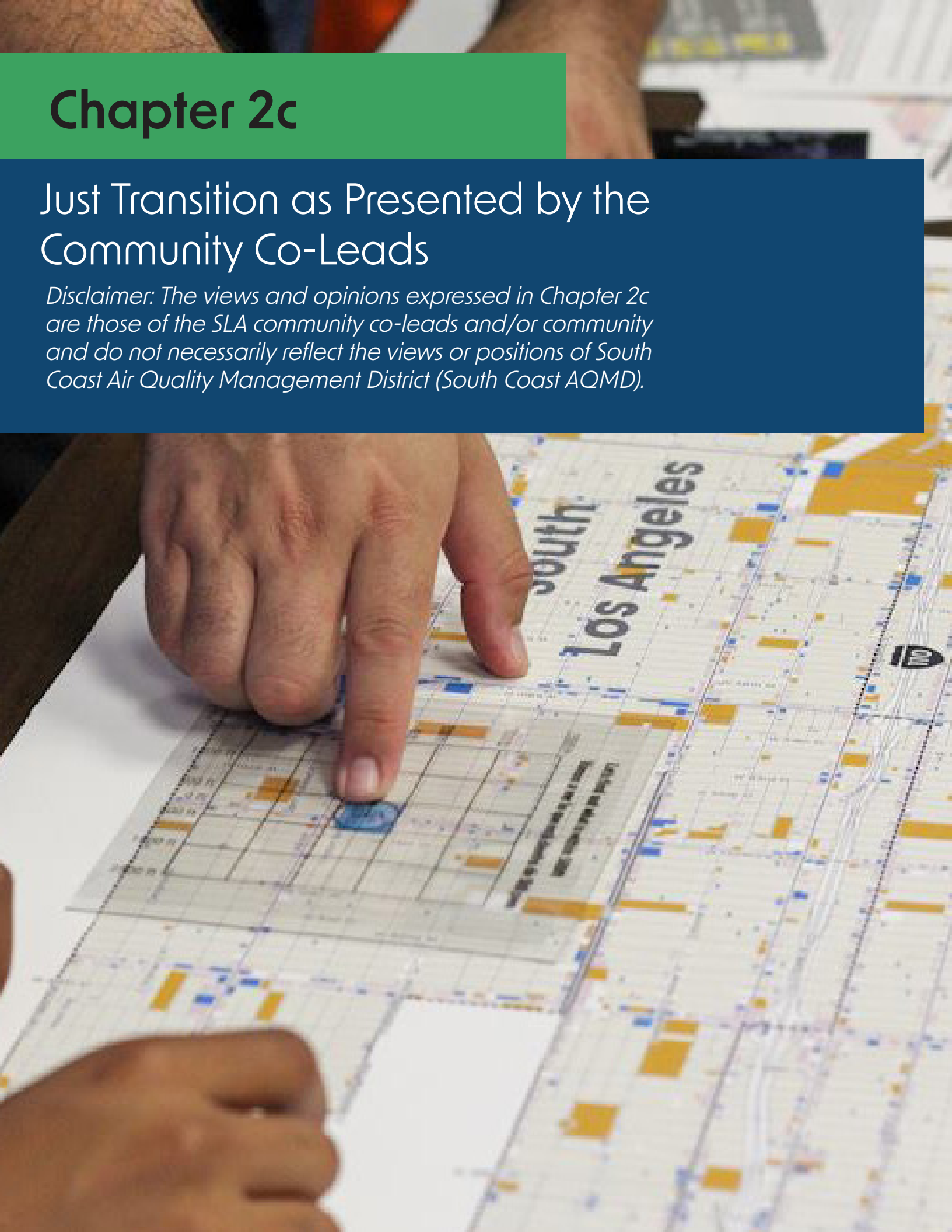
"SLA communities continue to experience the health impacts of legacy air pollution and cannot wait any longer for real solutions that tackle the root causes of pollution burden and get to tangible emissions reduction. We need to start moving community driven solutions that are rooted in the Environmental Justice and precautionary principles and can support a just transition towards clean production for a thriving and healthier SLA"

- Paula Torrado Plazas, PSR-LA

Chapter 2c

Just Transition as Presented by the Community Co-Leads

Disclaimer: The views and opinions expressed in Chapter 2c are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air Quality Management District (South Coast AQMD).



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Why We Need a Just Transition

Vision for South Los Angeles

South Los Angeles is a vibrant community where community residents and organizations are hungry for transformative change that can reverse the impacts of racialized decision making. The communities of South LA face interlocking health, environmental, housing and economic injustices that are shaping their individual and community health.[1] People living in South Los Angeles zip codes live on average 8-12 years less than people living in Bel Air.[2] Residents experience higher rates of asthma, heart disease, low birth weight, and cancer as compared to their wealthier neighbors in West and North Los Angeles.[3] A key demand from our communities is a community where residents can live, work, play, pray and thrive individually and collectively. The AB 617 community process to develop this CERP offers an opportunity to address the pervasiveness of industrial pollution from the perspective of public health by tapping into the creativity, and innovation that exists in the area.

This chapter is written by the co-leads in an attempt to begin a serious conversation on how we can simultaneously improve air quality, support green and just economic development and promote pollution prevention. Reducing pollution burden and cumulative stressors, and addressing racism as a public health crisis is essential to protecting already overburdened communities.[4] According to CalEnviroScreen, South Los Angeles census tracts score in the top 5-10% of census tracts that are disproportionately burdened by multiple sources of industrial pollution, including hazardous waste generators and contaminated tracts of land.[5] A growing body of literature demonstrates that "health disparities found among communities of racial or ethnic minorities and those of low socioeconomic status" are "not attributable to biological factors" alone but can be explained by social and environmental contributors.[6] For instance, a

[1] Gonzalez, D.J.X., Nardone, A., Nguyen, A.V. *et al.* Historic redlining and the siting of oil and gas wells in the United States. *J Expo Sci Environ Epidemiol* (2022). https://doi.org/10.1038/s41370-022-00434-9

[2] Los Angeles County Department of Public Health. (2013). Health atlas for the City of Los Angeles. Los Angeles County Department of Public Health. https://planning.lacity.org/odocument/7f065983-ff10-4e76-

[3] Los Angeles County Department of Public Health. (2013). Health atlas for the City of Los Angeles. Los Angeles County Department of Public Health. https://planning.lacity.org/odocument/7f065983-ff10-4e76- 81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf

[4] National Academies of Sciences. (2017). The state of health disparities in the United States. National Academies Press (US); 2017 Jan 11. 2. https://www.ncbi.nlm.nih.gov/books/NBK425844/

[5] CalEnviroScreen 3.0 indicators: https://oehha.ca.gov/calenviroscreen/indicators

[6] Negussie, A, and Geller A, Y. National Academies of Sciences, Engineering, and Medicine; Health and Medicine Division. Baciu Communities in Action: Pathways to Health Equity. Washington (DC): the National Academies Press

study suggests that environmental factors account for 30% of the total childhood asthma burden in California, but in places where pollution is acute, they could be responsible for up to 41% of that burden.[7] Exposure to multiple pollution sources and social stressors further compounds health disparities. In addition, the current COVID-19 pandemic has revealed and increased the urgent need for improved air quality and health protections. Research links industrial pollution exposure to significant health impacts, including low birth-weight, heart attack, stroke, and the development of chronic diseases such as asthma, cancers, learning disabilities, and reproductive problems and now heightened mortality for COVID-19.[8] Sensitive receptors, such as overexposed low-income and communities of color, children, pregnant women, and seniors are most at risk of long-term exposure to air pollution and are more likely to develop or exacerbate chronic diseases such as asthma.[9]

The combined environmental health impacts with other social and economic burdens results in residents being less able to cope with disease and thus further exacerbating health inequities. In addition to environmental health disproportionate impacts, South LA residents face a great deal of stress due to economic hardship, lack of economic development opportunities, and a high rate of unemployment. In 2015, 34% of South LA residents were living below the federal poverty line, almost double the rate in Los Angeles County (18%).[10] South LA residents today have a median personal income of $14,347, compared to over $30,000 for LA County.[11] The post-Recession unemployment rate that year was 14% in South LA, the highest among all service planning areas in Los Angeles. Residents face systematic barriers to full employment, which include: limited English proficiency, lack of driver's license or citizenship, lack of education, lack of transportation, and racial discrimination.[12] South LA workers are also often excluded from advancement in key growth sectors as well as clean and green jobs that can significantly support clean air, environmental justice, and economic justice goals.

A key issue that emerged in the South LA AB617 Community Steering Committee is the need to balance between cleaning up the air and ensuring economic development. Creative and

(US); 2017 Jan 11. 2, The State of Health Disparities in the United States. Available from: https://www.ncbi.nlm.nih.gov/books/NBK425844/

[7] Centers for Disease Control and Prevention. (2013). Asthma in California a surveillance report. California Department of Public Health. https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHIB/CPE/CDPH%20Document%20Library/Asthma_in_California_2013.pdf

[8] Xiao, W., Nethery R.C., Sabath B.M., Braun D., Dominici F. (2020). Exposure to air pollution and COVID-19 mortality in the United States: a nationwide cross-sectional study. MedRxiv. Article 04.05.20054502. https://doi.org/10.1101/2020.04.05.20054502

[9] Peden, D.B. (2020). Pollutants and asthma: role of air toxics. Environmental Health Perspectives 110, no. Suppl 4 (August 2002): 565–68.

[10] Scott, M. E. (2011). Voices from Los Angeles: barriers to good jobs and the role of the public sector. Retrieved from Strategic Concepts in Organizing & Policy Education website: http://scopela.org/our-work/research/

[11] https://censusreporter.org/profiles/79500US0603751-los-angeles-county-south-central-la-city-south-centralwatts-puma-ca/

[12] Institute for Applied Economics. (2017). Economic update for Los Angeles County. Retrieved from Los Angeles County Economic Development Corporation website: https://www.laedc.org/tag/economic-update/

collective community-driven solutions that are centered in a transformative public health approach that seeks to prevent pollution, improve healthy economic development, and create green and clean workforce opportunities. Building a path towards a healthy and green economy through community-driven solutions means we must first address the economic conditions of South LA that are marked by a history of racial discriminatory practices from redlining that led to the over siting of industries in the community and community disinvestment.[13] The South LA economy is characterized by limited public services and infrastructure spending, entrenched poverty conditions, and the expansion of exploitative practices, such as pay-day lending and low-wage, part-time work.[14] These limiting economic conditions are also further exacerbated by the inequitable distribution of the benefits of growing green jobs and new clean economy opportunities.[15]

There is an urgent need to address these cumulative issues with investments in supporting local sustainable economic growth, small businesses, and a transition to green jobs. Healthier and more sustainable forms of workforce development opportunities are growing in the energy industry sector that are becoming increasingly available and accessible. However, these opportunities in the green and healthier economy focus mainly on the energy sector. It is important that these opportunities of clean and green jobs are expanded to a more diverse set of businesses including small business owners and a larger population of workers.[16] Expanding on the concept of green jobs to a wide array of hazardous industries and other sectors can ensure more economic opportunities are available to workers. To achieve a healthy and green economy that does not burden the health of workers and communities, we must create opportunities for workers, small businesses, and industries who might lack the job experience or educational opportunities necessary to access green jobs can develop the skills necessary to own a small green cleaning business or become a sustainable industry. Expanding access to workers and businesses to educational opportunities and adequate training to implement green and clean production practices can significantly address the disproportionate economic and environmental health hardships South LA residents and workers face today.

Based on the community insights gathered through the AB617 South LA Community Steering Committee (CSC), and the economic and health burdens South LA residents and workers experience daily, it is clear that to achieve air quality improvements we must combine a number of strategies and approaches that aim at achieving both health equity and economic justice. One of these approaches is developing and implementing Just Transition strategies that promote the

[13] Pulido, L. (2016). Flint, environmental racism, and racial capitalism, Capitalism Nature Socialism, 27(3), 1-16. doi: 10.1080/10455752.2016.1213013

[14] Scott, M. E. (2011). Voices from Los Angeles: barriers to good jobs and the role of the public sector. Retrieved from Strategic Concepts in Organizing & Policy Education website: http://scopela.org/our-work/research/

[15] https://southlaisthefuture.org/wp-content/uploads/2020/07/SouthCentralRootedFullReport.pdf

[16] Avis, E., and Zabin, C. (2013). Training for the future: workforce development for a 21st century utility workforce. Retrieved from UCLA Labor Center website: http://laborcenter.berkeley.edu/pdf/2013/training_future13.pdf

implementation of Best Available Control Technologies process changes and innovations in clean production strategies. The South LA AB 617 Community Emissions Reduction Plan (CERP) development and implementation is key for addressing air pollution burden in South LA and creating a path towards emissions reductions, health protections, and a Just Transition.

Multiple Definitions of The Just Transition and SLA Definition

The Just Transition framework first emerged from labor unions and environmental justice groups who recognized the need to phase out harmful industries while at the same time providing just pathways for workers in those industries to transition to other high road jobs and careers.[17] The Just Transition framework provides a platform for communities to work together with industries to develop strategies that address environmental health issues and create cleaner and safer industries. The framework has evolved over the years and its definition has changed to meet the needs of the current political climate. Some existing definitions that the environmental justice movement refers to are:

As defined by the Just Transition Alliance, Just Transition is a principle, a process and a practice. "The Just Transition process for achieving a healthy economy should be a fair one that should not cost workers or community residents their health, environment, jobs, or economic assets. Any losses should be fairly compensated. And the practice of just transition means that the people who are most affected by pollution — the frontline workers and fence-line communities — should be in the leadership of crafting policy solutions."[18]

As defined by the Climate Justice Alliance, Just Transition is a vision-led, unifying and place-based set of principles, processes, and practices that build economic and political power to shift from an extractive economy to a regenerative economy. "This means approaching production and consumption cycles holistically and waste-free. The transition itself must be just and equitable; redressing past harms and creating new relationships of power for the future through reparations. If the process of transition is not just, the outcome will never be. Just Transition describes both where we are going and how we get there."[19]

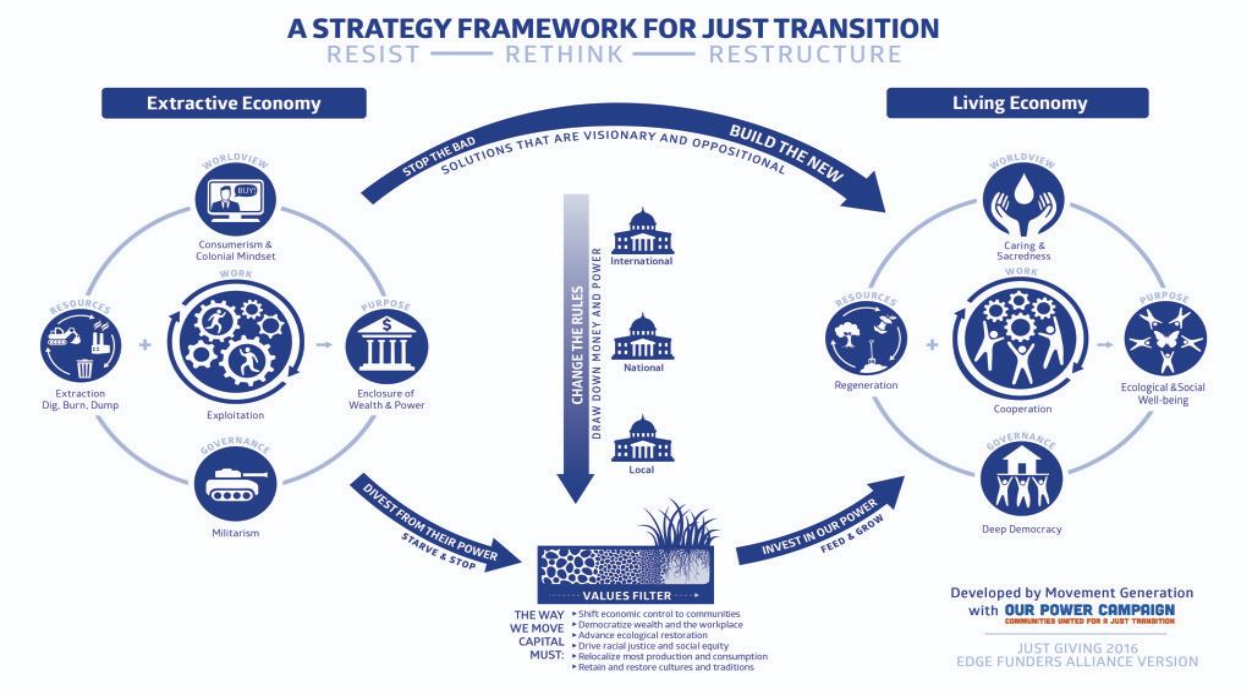
In addition, a Just Transition framework was further defined and framed by the Movement Generation organization that defined the process as: "shifting from dirty energy to energy democracy, from funding highways to expanding public transit, from incinerators and landfills to zero waste, from industrial food systems to food sovereignty, from gentrification to community

[17] Spanne, A. (2021, June 30). *Just transition: History, principles, and examples*. Treehugger. Retrieved May 13, 2022, from https://www.treehugger.com/just-transition-history-principles-and-examples-5190469

[18] *What is just transition?* Just Transition Alliance. (2022, February 26). Retrieved May 13, 2022, from https://jtalliance.org/what-is-just-transition/

[19] *Just transition*. Climate Justice Alliance. (2022, February 14). Retrieved May 13, 2022, from https://climatejusticealliance.org/just-transition/

land rights and from rampant development to ecosystem restoration. Workers and communities impacted first and worst must lead the transition to ensure it is just."[20]



Just Transition Framework developed by Movement Generation[21]

All of the above-mentioned definitions have shaped our own concept of a Just Transition for South Los Angeles. For the AB617 South LA community co-leads the concept of a Just transition means a transition away from our fossil fuel dependent and extractive economy towards one that is regenerative and centered in protecting the health of both workers and communities first. Key to this Just Transition is addressing the disproportionate environmental harms and burdens environmental justice communities face and providing these same communities opportunities to benefit first from new clean, greener, and healthier jobs. This complete transition is an opportunity for South LA communities to have access to the environmental, health, and economic benefits of future clean and green jobs as part of this new regenerative economy. The principles of a Just Transition are embedded in our vision for transforming air quality and community health in South Los Angeles and our goals for ensuring that a healthy economy and a clean environment can and should co-exist.[22]

[20] *Movement Generation Justice & Ecology Project*. Movement Generation. (n.d.). Retrieved May 13, 2022, from https://movementgeneration.org/movement-generation-just-transition-framework-resources/

[21] *Movement Generation Justice & Ecology Project*. Movement Generation. (n.d.). Retrieved May 13, 2022, from https://movementgeneration.org/movement-generation-just-transition-framework-resources/

[22] Darren McCauley, Raphael Heffron, Just transition: Integrating climate, energy and environmental justice, Energy Policy, Volume 119, 2018, Pages 1-7, ISSN 0301-4215, https://doi.org/10.1016/j.enpol.2018.04.014 .

Green Economy and Safer Alternatives

To effectively reduce harmful emissions in highly polluted communities we need to identify, require, incentivize, and implement regulations and innovative rules that can advance Best Available Control Technologies (BACT) and emissions reduction technologies. We must also focus on clean production and process change strategies and best practices to support pollution prevention and emissions reductions activities. We also need to ensure that we are promoting the cleanest, safest and least toxic emission control technologies and practices that can help industries reduce emissions and be better neighbors. The safer alternatives and best practices approach to production, along with smarter economic policies, can be the pillars for a healthier and more successful green economy.[23] Solving the complex health and environmental problems of our day are inextricably linked to strengthening local economies, greening production with safer alternatives, and establishing strong trust-based relationships among industries, workers, and community members.

Good Neighbor Agreements

South LA is a community clustered with many small industries, businesses, and high-volume traffic highways that are sources of air pollution and are contributing to cumulative impacts and heightened exposure to harmful pollution linked to adverse health outcomes. To build a stronger movement for a green and healthier economy in South LA, we need to start including a more diverse set of businesses and a larger population of workers in the development of solutions to reduce pollution and address environmental harms. Workers and small businesses who might lack the job experience or educational opportunities necessary to access green jobs or to develop the skills necessary to own a small green cleaning business, should be provided with the opportunity to become a sustainable business and leaders on safer alternatives and clean production. This is particularly important for our Just Transition vision for South La, that as we are strengthening local economies we are building relationships bridges between industries and communities that are based on solidarity and on centering health first for all.

In order to accomplish that, communities, workers, unions, and the labor force should work together to forge a path to reduce harmful exposures, enhance economic development, and create healthier and sustainable communities. For that, we refer to the development of Good Neighbor Agreements that can establish interaction guidelines among industries and communities as well as accountability metrics for implementing best practices that can contribute to emissions reduction and health protection measures.

Good neighbor agreements are instruments that provide a vehicle for communities and industries to recognize and formalize their roles in the community in a way that fosters community health, safety, sustainable development, and economic growth.[24] Through the AB617

[23] Attar, Kathy. Molecules to Movement Physicians for Social Responsibility - Los Angeles. (2011) https://www.psr-la.org/from-molecules-to-movements-a-recap/

[24] Lewis, S., and Henkels, D. (1996). Good Neighbor Agreements: A Tool For Environmental and Social Justice. *Social Justice*, *23*(4 (66)), 134–151. http://www.jstor.org/stable/29766980

CSC, community members and industry representatives can undergo an iterative process to define these agreements on a consensus basis. Some examples of these agreements include:

- Community access to information
- Communities can request facilities inspections based on concerns
- Industries should develop emergency response plans that are vetted by the community
- Industries should develop a pollution prevention plans that are vetted by the community

The AB617 South LA co-leads believe that a Just Transition for facilities of concern cannot occur without trust and strong agreements. In order to achieve the principles of a Just Transition in industries, small businesses, and facilities of concern, South LA communities must first forge a relationship with the regulated community that is based on trust and achieving a common goal: healthier communities for all.

SLA Just Transition Project Examples – AB 617 Incentive Funds

We propose the following Just Transition potential projects for South LA that can help us further our vision for cleaning up the air and ensuring economic and environmental justice for the community.

A Just Transition Pilot Project for SLA Dry Cleaners

Background

Located in South LA there are approximately more than 50 hydrocarbon dry cleaners that are all regulated by SCAQMD due their adverse air emissions. These facilities also generate avoidable hazardous waste, create avoidable fire risk, generate avoidable excess energy demand. The majority of dry cleaners in South Central LA use Perchloroethylene (PERC) for their chemical-based dry-cleaning process. The California Air Resources Board passed a regulation to phase out PERC by 2020.[25] As PERC is being phased out, dry cleaners are being pushed to use other alternatives. The remaining dry cleaners are using hydrocarbons as a transition, which in addition to being combustible, has also been a source of air and water pollution.

Pollution Burden and Health Impacts

Perchlorethylene (PERC) is a source of significant groundwater contamination and is a hazardous air pollutant that is contributing to the development of chronic diseases in sensitive populations. Short-term: Breathing high levels of (PERC) for a short time can cause: dizziness, drowsiness, headache, nausea and vomiting, lack of coordination, irritation of the eyes and respiratory tract. Long-term: The health impacts may include cancer.[26]

[25] *California Air Resources Board*. Phase Out of Perchloroethylene from the Dry Cleaning Process | California Air Resources Board. (n.d.). Retrieved May 16, 2022, from https://ww2.arb.ca.gov/our-work/programs/phase-out-perchloroethlyene-dry-cleaning-process

[26] Environmental Protection Agency. (n.d.). EPA. Retrieved May 16, 2022, from https://www.epa.gov/stationary-sources-air-pollution/risk-assessment-perchloroethylene-dry-cleaners-refined-human-health

Regrettable Substitutions

The hydrocarbon dry cleaning alternative has not been classified as a non-toxic alternative. While hydrocarbons are toxic and explosive, it continues to be falsely advertised as an environmental or eco-friendly product causing many small dry cleaners owned by mostly immigrants and people of color to switch to hydrocarbons toxic and harmful alternatives. Most South Los Angeles dry cleaners have switched from PERC to hydrocarbon based solvents machines. Given that Professional Wet Cleaning is a zero-emission, non-combustible, energy-efficiency, non-hazardous waste generating technology with operating costs that are lower than solvent-based dry cleaning, the transition from PERC to hydrocarbon is a regrettable substitution.

Best Available Control or Emission Reduction Technologies

A preliminary assessment of the available emissions reduction technologies using SCAQMD criteria to identify the most stringent NonToxic Alternative demonstrated that Professional Wet Cleaning is a best alternative technology.[27] This assessment is supported by the 2005 California Air Resources Board (CARB) classification of Professional Wet Cleaning as nontoxic and non-smog forming alternatives based on their relatively benign human health, environmental, and physical property hazard profile.[28]

Non-Toxic Alternatives

Professional Wet Cleaning is a dry-cleaning technology that uses water-based detergents. CO2 Dry Cleaning is a dry-cleaning technology that uses CO2 as a cleaning solvent. Since this CO2 is captured from recycled sources, it is also considered an environmentally-preferable alternative.

Just Transition and South Coast AQMD

Many of the policies and actions of the SCAQMD can support the advancement of the goals of a Just Transition Plan. For example, the specific policies and procedures SCAQMD has developed for the classification of Best Available Control Technology are designed to specifically reduce emissions of harmful air emissions to the maximum extent possible, and explicitly include the use of pollution prevention approaches which have the potential to eliminate harmful air emissions altogether.

Another clear example of actions that have been taken by the SCAQMD to advance the goals of a Just Transition was the leadership SCAQMD took in promoting the commercial viability of Professional Wet Cleaning as a zero-emission pollution prevention approach to dry cleaning. In 2000, the same year that SCAQMD instituted BACT, the agency funded a project to provide incentive funds designed to convert the first set of dry cleaners using the toxic chemical PERC to Professional Wet Cleaning. Findings from this project were published in a peer review paper co-authored by SCAQMD demonstrating the commercial viability of Professional Wet Cleaning.

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[27] Ceballos, Diana M. Perchloroethylene and Dry Cleaning: It's Time to Move the Industry to Safer Alternatives. Frontiers in Public Health. 9 (2021) https://www.frontiersin.org/article/10.3389/fpubh.2021.638082 DOI=10.3389/fpubh.2021.638082 ISSN=2296-2565

[28] *California Air Resources Board*. Non-Toxic Dry Cleaning Grant Program (AB998) | California Air Resources Board. (n.d.). Retrieved May 16, 2022, from https://ww2.arb.ca.gov/resources/documents/non-toxic-dry-cleaning-grant-program-ab998

AB 617 Incentive Funds for SLA Dry Cleaners Just Transition Project

A potential Just Transition project for dry cleaners in South LA is to utilize AB617 incentive funds towards creating a Professional Wet Cleaning training and Just Transition center. The incentive funds will support one South LA dry cleaners to replace their hydrocarbons solvent based machines to use professional wet cleaning technology. It will also allow this dry cleaner to create a transition training site for workers and fellow dry cleaner owners to learn about the technology, how it operates, how to install it, and how it benefits the health of both workers and communities. This pilot project will create an initiative that can build a path for South LA garment workers and family-owned dry cleaners to have the opportunity to truly learn about safer chemical-free alternatives, how to use incentives funds to transition, and benefit the communities around.

PSR-LA, through its SCLA-PUSH project funded by the AB617 Community Air Protection Grants, identified South LA dry cleaners that can potentially transition to using a non-toxic/non-hazardous Professional Wet Cleaning and use the facility as a demonstration site to educate fellow cleaners about the viability of Professional Wet Cleaning. The SCLA-PUSH project partnered with a Los Angeles-based AQUA WET CLEAN, a dedicated service provider for Professional Wet Cleaning, to identify a South LA cleaner using PERC or Hydrocarbons based solvents willing to convert to Professional Wet Cleaning and service as a demonstration site.

In June 2021, AQUA outreached to Monica's Dry Cleaners, a Latino owned dry cleaner located in the heart of South Los Angeles. PSR-LA worked with AQUA to develop an agreement for Monica's Dry Cleaners process of converting to Professional Wet Cleaning and becoming a demonstration site that can help with training for other dry cleaners.

The AB617 South LA Incentive funds will be used to cover the costs, as specified on the AQUA/Monica's agreement for removing the hydrocarbon dry cleaning machine from Monica's, install a professional wet cleaning system, complete initial training in professional wet cleaning, cover the cost of a three-year equipment lease, and carry out Professional Wet Cleaning demonstration activities over a three years period including – hosting ongoing demonstration of professional wet cleaning to fellow commercial apparel care cleaners, hosting individual site visits, and hosting training sessions for cleaners making a transition to Professional Wet Cleaning.

Completing this transition and beginning demonstrations at Monica's is essential to showcasing what a successful Just Transition initiative in South LA can look like. This Just Transition model for Dry Cleaners can support the overall AB617 goals to reduce emissions in the community by moving Dry cleaners away from their dependence on toxic chemicals and petroleum based solvents to safer and cleaner alternatives that can create significant benefits to workers/owners, the community, and the environment. Some initiatives for the CERP actions and Just Transition Case Study are:

California-based regulatory initiatives (e.g., classifying Professional Wet Cleaning as Best Available Control Technology for dry cleaning).

Broadening California's non-toxic dry clean incentive program to include fees on the full range of toxic/hazardous dry clean solvents including hydrocarbons.

Creating financial instruments to make the switch to best available technologies affordable.

Auto Body Shops Just Transition Training Pilot Project

Auto Body and repair shops is another sector that has the opportunity to support small businesses in the implementation of safer and best practices that can reduce community and workers' exposure to harmful pollution. Programs such as the Boston Health Auto Body Shop and the Safer Auto Body Shop projects in Massachusetts.[29] These programs can serve as a model for working directly with Auto Body shops to develop a more proactive and holistic approach that can support businesses in transitioning to using best practices and reducing their emissions. These new innovative models and approaches to increase compliance among Auto Body shops as well as implementation of pollution prevention practices can support AB617 goals in South LA. These programs provide environmental training and resources for auto body and repair shops. The programs are designed to help regulatory agencies build relationships with Auto Body shops, which are often hard to reach businesses, to implement community driven compliance goals. These programs provide training and demonstrations on how to achieve compliance with SCAQMD rules and implement pollution prevention and other best management practices.

The implementation of a more proactive approach to outreach, compliance, and enforcement that uplifts the principles of a Just Transition, Green Alternatives, and Good Neighbor Agreements can ensure businesses, workers, and communities are engaging in a process that aims at transforming the state of air quality in South LA. The goals of the Boston and Massachusetts Auto Body Shop Programs can help SCAQMD engage with the regulated business in a way that promotes use of best practices and creates a path towards active compliance and air quality improvements.

[29] *The Massachusetts Clean Auto Repair (masscar) guide*. Mass.gov. (n.d.). Retrieved May 13, 2022, from https://www.mass.gov/guides/the-massachusetts-clean-auto-repair-masscar-guide

Chapter 2d

Emissions and Source Attribution

Introduction

Chapter 2d Highlights

- Information about the sources of air pollution in this community is presented in a "source attribution" analysis
- Sources of air pollutant emissions in this community include on-road vehicles, trains, off-road equipment, and various industrial activities
- Diesel particulate matter (DPM) is currently the main TAC in this community, and comes mostly from on-road and off-road mobile sources
- Other key TACs in this community are 1,3-butadiene and benzene, and comes from mobile sources and/or plastic production
- In future years, DPM emissions will decrease substantially from ongoing and newly proposed regulations, but these emissions continue to be the main driver of TAC cancer risk in this community

The Community Emissions Reduction Plan (CERP) identifies air quality priorities based on community input and evaluation of technical data on emission sources in the community. The CERP defines actions and strategies to reduce the emissions and exposure burden from sources of criteria air pollutants and toxic air contaminants (TACs). To accurately determine emission reductions from these actions and strategies, baseline emissions are established. The baseline emissions provide a reference and is developed based upon an accounting of the current emissions from sources. This rigorous accounting of sources, their emissions and their contribution to cumulative exposure burden is what the California Air Resources Board (CARB) guidelines identify as a source attribution analysis. Per the direction of CARB guidelines, source attribution is required to meet Assembly Bill 617 (AB 617) statutory requirements.[1]

The emissions inventory presented here is consistent with CARB recommendations for conducting a source attribution analysis, with an emphasis on identifying sources within the community. This approach is considered best for the South Los Angeles (SLA) community based on the availability of data and resources. More information on source attribution methods is included in the Methodology for Source Attribution Analyses for the first year AB 617

[1] California Health and Safety Code, Section 44391.2 (b)(2) directs CARB to provide "[a] methodology for assessing and identifying the contributing sources or categories of sources, including, but not limited to, stationary and mobile sources, and an estimate of their relative contribution to elevated exposure to air pollution in impacted communities…"

Communities in the South Coast Air Basin Source Attribution Methodology Report (Technical Report).[2]

The most recent comprehensive air quality and TACs modeling analysis in the region was conducted as part of the fifth Multiple Air Toxics Exposure Study (MATES V)[3] released in August 2021.

MATES V showed DPM to be the air pollutant that contributed the most to air toxic pollutants cancer risks in the South Coast Air Quality Management District (South Coast AQMD).

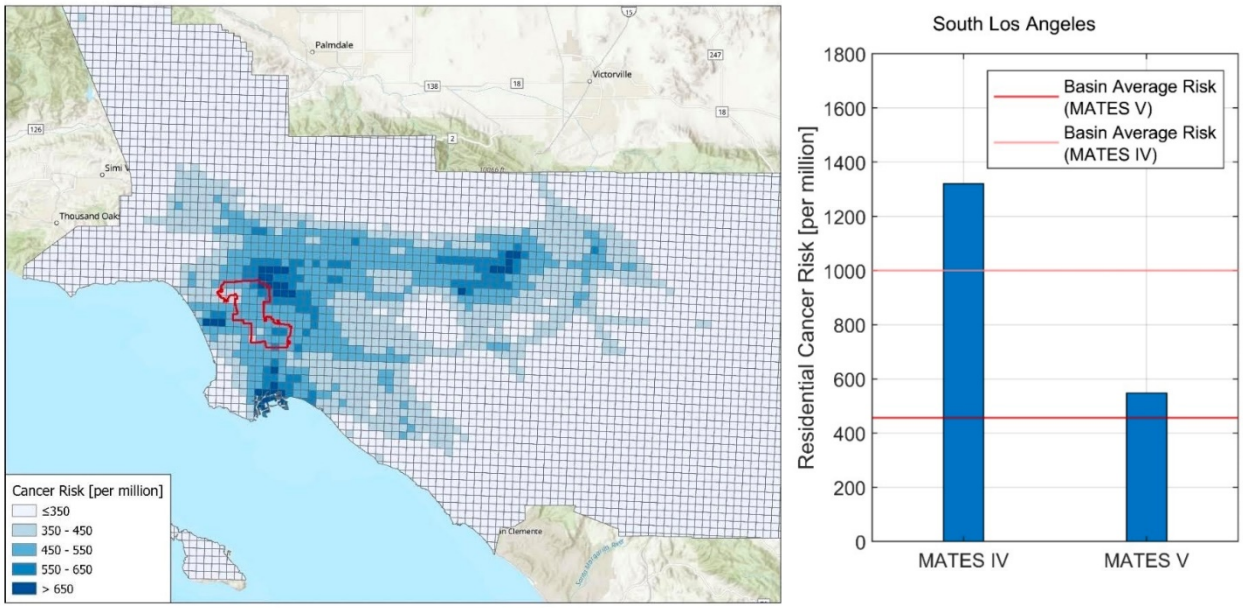
Figure 2d-1 provides a comparison of the average SLA cancer risk under the fourth Multiple Air Toxics Exposure Study (MATES IV) and MATES V, and the average basin-wide cancer risk in MATES IV and MATES V. A map is included to show the SLA community in comparison to the average of the South Coast Air Basin (Basin) from MATES V. TAC cancers risk in SLA is generally above the Basin's average cancer risk of 456 chances in a million in comparison to 548 chances in a million. Additionally, the MATES V data shows that for both SLA and the Basin as a whole, including SLA, the TAC risk is dominated by DPM, 66.3 percent in SLA and 67.3 percent in the Basin as a whole, including SLA. The cancer risk estimates in the MATES V study align well with the CalEnviroScreen 4.0 scores,[4] shown in **Figure 2d-2** CalEnviroScreen 4.0 scores for SLA are mostly above the average, with many tracts being above the 90th percentile.

[2] South Coast AQMD, Methodology for Source Attribution Analyses for the first year AB 617 Communities in the South Coast Air Basin (Technical Report), November 2019, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/source-attribution-methodology.pdf

[3] South Coast AQMD, The Multiple Air Toxics Exposure Study V (MATES V), August 2019, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

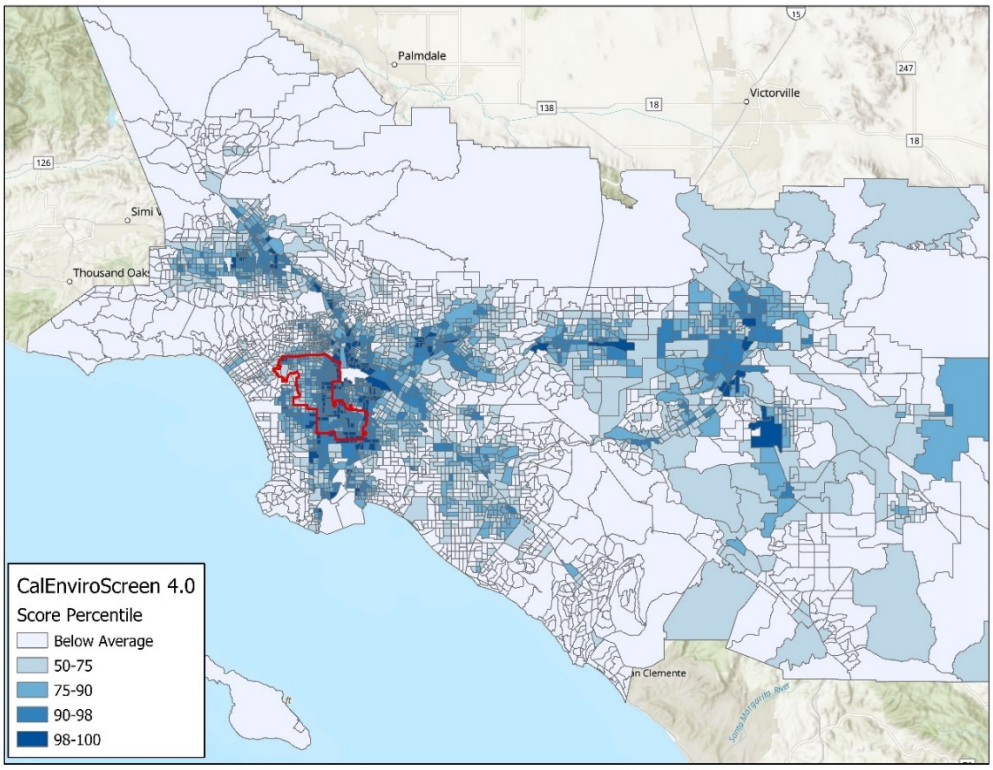
[4] Office of Environmental Health Hazard Assessment (OEHHA), CalEnviroScreen 4.0, https://oehha.cagov/calenviroscreen/report/calenviroscreen-40

Figure 2d-1: Residential Air Pollutants Cancer Risk Calculated in the MATES IV and V Study for the Basin



SLA community boundary

Figure 2d-2: Overall CalEnviroScreen 4.0 Score Percentile for the Basin



SLA community boundary

United States Environmental Protection Agency (U.S. EPA) National Ambient Air Quality Standards (NAAQS)[5]

The Clean Air Act requires the U.S. EPA to set NAAQS for each of the six criteria pollutants:

1. nitrogen oxides (NOx),
2. ozone, particulate matter (PM),
3. carbon monoxide (CO),
4. sulfur dioxides (SOx), and
5. lead.

The Clean Air Act identifies two types of standards: primary and secondary. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as people with respiratory or other health conditions, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. South Coast AQMD currently does not meet the federal standards for ozone and fine particulate matter (PM2.5), which means that population is exposed to unhealthy levels of ozone and PM2.5 throughout a certain number of days in a year.[6] Thus, these are criteria pollutants of concern in the Basin. **Table 2d-1** provides the threshold levels, in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter (µg/m^3), as established by the U.S. EPA.

Table 2d-1: NAAQS Table[7]

Pollutant	Primary/Secondary		Averaging Time	Level
CO	Primary		8 hours	9 ppm
			1 hour	35 ppm
Lead	Primary and secondary		Rolling 3-month average	0.15 µg/m^3
NOx	Primary		1 hour	100 ppb
	Primary and secondary		1 year	53 ppb
Ozone	Primary and secondary		8 hours	0.070 ppm
PM	PM2.5	Primary	1 year	12.0 µg/m^3
		Secondary	1 year	15.0 µg/m^3
		Primary and secondary	24 hours	35 µg/m^3

[5] U.S. EPA, Reviewing NAAQS: Scientific and Technical Information, https://www.epa.gov/naaqs

[6] In Los Angeles County in 2020, the ozone standard was exceeded nearly 100 days and the PM2.5 daily standard exceeded 28 times. South Coast AQMD, 2022 Air Quality Management Plan, Chapter 2: Air Quality and Health Effects, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/05-ch2.pdf

[7] U.S. EPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table

Pollutant	Primary/Secondary		Averaging Time	Level
	Coarse PM (PM10)	Primary and secondary	24 hours	150 µg/m^3
SOx	Primary		1 hour	75 ppb
	Secondary		3 hours	0.5 ppm

Criteria Air Pollutants

This chapter provides a summary of pollutant emissions that affect the pollutant levels in this community. To develop an effective emissions reduction plan, it is important to understand the sources (**Figure 2d-3**) that contribute to, and have the greatest impact on, pollution levels in the community.

Figure 2d-3: Sources of Criteria Air Pollutants in SLA

Nitrogen Oxides (NOx)

NOx is a family of highly reactive gases which form when fuel is burned at high temperatures. NOx pollution is emitted from combustion sources, such as automobiles, trucks, and various non-road vehicles (e.g., construction equipment, boats) as well as industrial sources such as power plants, industrial boilers, cement kilns, and turbines. NOx is an important contributor to the regional formation of smog (ozone) and PM2.5, and hence, can further contribute to worsening health impacts.

Reactive Organic Gases (ROGs) or Volatile Organic Compounds (VOCs)

ROGs, also known as VOCs, are not considered a criteria air pollutant; however, due to its contribution to ozone formation they are a pollutant of concern. Additionally, some ROGs are

considered TACs. ROGs are a wide family of gaseous components that generally contain atoms of carbon, hydrogen, and other elements. Many of these compounds exist in liquid form but can slowly evaporate into the air and react to form smog and particulate matter (i.e., PM2.5). ROGs are present in products that are used regularly, such as cleaning products, cosmetics, paint, and fuels. They are also emitted from a wide variety of industrial processes that involve solvents, petroleum, paint, coatings, and cleaning and degreasing agents. Some ROG compounds are relatively safe, like alcohols and fragrances, but other ROG compounds like formaldehyde, benzene, and 1,3-butadiene, are known to be carcinogenic (cancer causing).

Ozone

Ozone forms when NOx and ROGs react in the presence of sunlight. Ozone levels are highest during warm months when there are high temperatures and an inversion layer. An inversion layer occurs when warm, dry air overlays cooler, moist air, thus, limiting the dispersion of emissions into the air. Health impacts from short-term exposure (lasting for a few hours) to ozone can result in breathing pattern changes, breathing capacity reduction, increased susceptibility to infections, and lung tissue inflammation.

Coarse Particulate Matter (PM10)

PM is a mixture of solid particles and liquid droplets suspended in the air. Particles with a diameter of 10 microns or less (PM10) are inhalable into the upper region of the lungs and can cause adverse health effects. Short-term exposures to PM10 can worsen health effects in those with respiratory diseases. PM10 typically comes from dust from construction sites, wildfires, industrial sources, and wind-blown dust from open lands. These compounds can be man-made or from natural sources such as trees and vegetation.

Fine Particulate Matter (PM2.5)

PM10 includes particles less than 2.5 micrometers in diameter, called fine PM, or PM2.5, which pose the greatest risk to health. Health impacts from PM2.5 include premature mortality, heart disease, and respiratory illnesses like asthma and bronchitis. Emissions of PM2.5 come from a variety of sources, including fuel combustion from vehicles, industrial processes and wood burning. Cooking and mechanical processes, like construction and resuspended dust from traffic, are also sources of PM2.5.

Toxic Air Contaminants (TACs)

A TAC is an air pollutant which may cause or contribute to an increase in mortality or serious illness, or pose a present or potential hazard to human health. TACs can have an associated cancer risk and/or have negative non-cancer health impacts.

Cancer and Non-Cancer Risk

Cancer risk is the estimated probability of an exposed individual contracting cancer as a result of exposure to TACs. In the CERP, impacts are reported from all TACs by combining their associated cancer risk potency relative to DPM, which is the most prevalent TAC. TACs are combined to provide a succinct way to express the impacts of many different compounds with varying levels

of toxicity. Cancer risk potency[8] is a measure of cancer risk from a lifetime of exposure to a compound. Additional details are provided in the Source Attribution Methodology Report.[2]

Non-cancer health effects can include respiratory or reproductive harm resulting from exposure (acute or chronic) to toxic substances. Acute exposure refers to short-term contact (on the order of a few hours) with a toxic substance, whereas chronic exposure refers to continuous contact over long periods of time, from months to years.

Toxic Air Contaminants in South Los Angeles

DPM is a form of PM that comes from the combustion of diesel fuel. Most DPM is in the PM2.5 size range and has the same health burdens associated with fine PM. DPM has also been identified as a TAC and is known to cause cancer. In SLA, DPM is by far the most dominant air pollutant for cancer risk.

In addition to DPM, many other compounds emitted into the air have been identified as TACs. The most prevalent TACs in this community include benzene, formaldehyde, 1,3 butadiene, and hexavalent chromium, which are all carcinogens. In SLA, non-diesel sources of concern are on-road vehicles, mostly gasoline powered cars and light-duty trucks, and industrial stationary sources that use, process, or generate toxic compounds. Many of these TACs also have non-cancer health impacts. Hence, it is important to note that the strategies that reduce TACs will have health benefits beyond reductions in cancer risk.

Air pollution affecting SLA comes from sources within the community, as well as sources throughout the region. This CERP and source attribution analysis focus on stationary, areawide, and mobile sources (on- and off- road) that are within the community boundary. Four major categories are identified in the inventory:

1. facilities (also referred to as stationary sources[9]),
2. areawide sources[10] (e.g., emissions from sources widespread throughout the community like consumer products, home water heaters),
3. on-road sources,[11] and
4. off-road sources (e.g., construction equipment, forklifts).

[8] Office of Environmental Health Hazard Assessment, Appendix A: Hot Spots Unit Risk and Cancer Potency Values, October 2020, https://oehha.ca.gov/media/downloads/crnr/appendixa.pdf

[9] Stationary sources are divided into two major subcategories: point and areawide sources. Point sources consist of a single emission source with an identified location point at a facility. Areawide sources are small emission sources that are widely distributed but may have substantial cumulative emissions.

[10] Areawide sources are smaller sources of pollution, including permitted sources smaller than the South Coast AQMD emission reporting threshold and those that do not receive permits (e.g., water heaters, gas furnace, fireplaces, woodstoves, architectural coatings) that often are typically associated with homes and non-industrial sources.

[11] Mobile sources are moving sources of air pollution such as on-road sources (e.g., automobiles, motorcycles, trucks) and off-road vehicles (e.g., construction equipment, forklifts).

South Coast AQMD studied local pollution sources for many decades and continues to develop databases and tools to estimate the emissions from all the known sources known in the region. South Coast AQMD in conjunction with CARB periodically updates the emissions inventory with the best and most up-to-date information possible.

Quantification of emissions from most sources relies on estimates that come from emissions modeling tools because it is impractical and unreasonable to install a pollutant measuring device on every single source of pollution (e.g., car, truck, stove, stack). Only certain facilities are required to report emissions to the South Coast AQMD, and their reports can be corroborated through inspections.

The following sections briefly explain the overall methodology to account for emissions from the four major source categories. Inventories are developed using the most up-to-date information and emission modeling tools employed by both South Coast AQMD and CARB. But, when accounting for emissions, there is an inherent uncertainty and limitation, whether they are based on self-reported emissions from facilities into the South Coast AQMD Annual Emissions Reporting (AER)[12] program, or from estimates based on emission modeling tools.

Facilities (Stationary Sources)

Emissions in the community come from stationary sources, such as industrial facilities, including those that conduct metal processing, surface coatings, auto body shops, and warehousing that attracts heavy-duty truck traffic (**Figure 2d-4**).

[12] South Coast AQMD, AER, https://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting

Figure 2d-4: Air Pollution Sources from Industrial Facilities in SLA

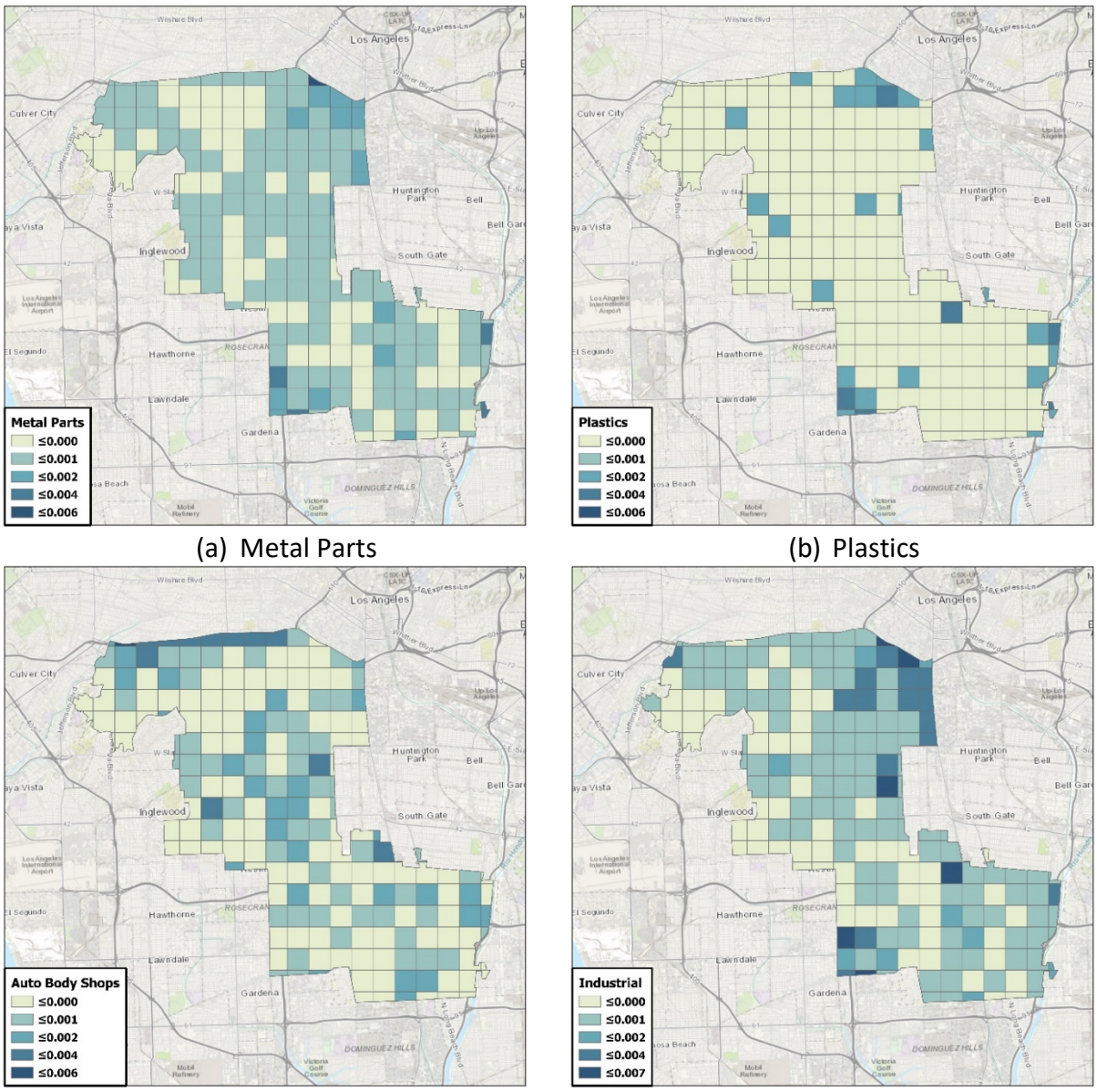
Emissions data from facilities in the community that submit reports under the AER program are extracted from the database based on the facility's location coordinates. Facilities required to file an AER include the following:

- Every facility that has estimated annual emissions of four or more tons of either SOx, VOCs, other specific organic compounds, NOx, PM, or emissions of 100 tons or more per year of CO.
- Every facility subject to the Assembly Bill 2588 (AB 2588) Program[13] for reporting quadrennial updates to its TAC emissions inventory.[14]
- Every facility subject to CARB's Criteria Pollutants and Toxics Reporting Regulation (CTR).[15,16]

Emissions from smaller facilities that are not required to report under AER are estimated using emission modeling tools that calculate emissions aggregated at the county level, and then are geographically allocated using surrogate information that represents the location of each source. **Figure 2d-5** presents examples of geographic distributions for some sectors of interest based on the community's air quality priorities. The geographic distribution indicates the fraction of the total county emissions from a given activity sector in each one kilometer-by-one kilometer square within the community.

[13] South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588
[14] California Health and Safety Code, Section 44344
[15] CARB, CTR, https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting
[16] CTR is the statewide annual reporting of criteria air pollutant and TAC emissions data from facilities to support the mandates of AB 617, AB 197, and AB 2588.

Figure 2d-5: Examples of Geographic Distribution of Small Facilities in Various Industrial Sectors in SLA



(a) Metal Parts (b) Plastics

(c) Auto Body Shops (d) General Industrial Facilities[17]

Areawide Sources

Areawide sources are sources of emissions that are generally small or not associated with an individual stack or engine. These sources (**Figure 2d-6**) include evaporation of paint and coatings,

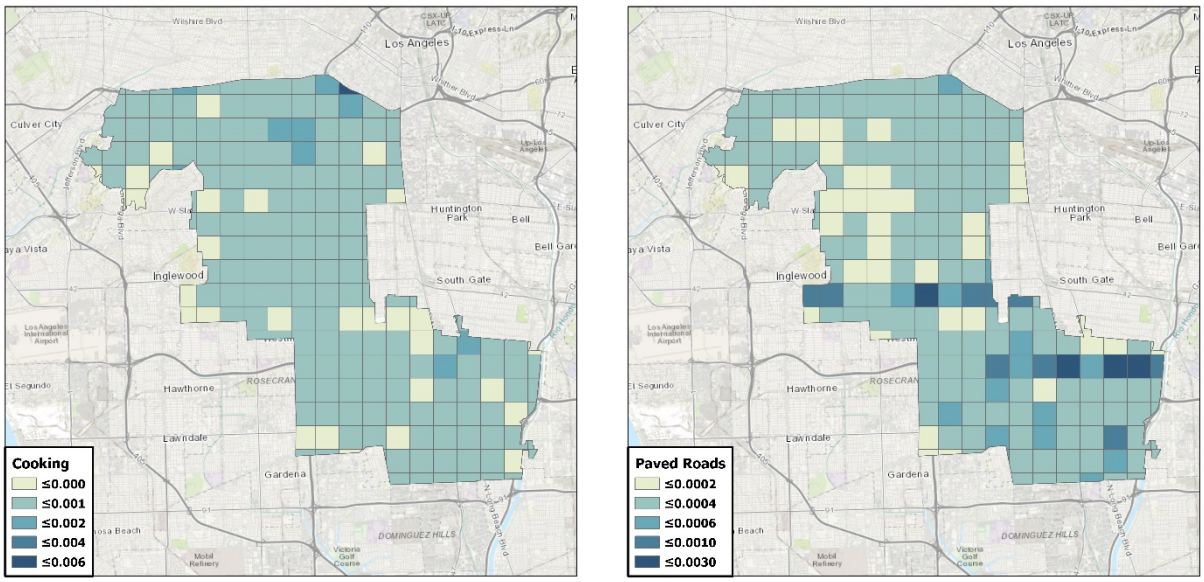
[17] The term "general industrial facilities" is used for the geographical distribution of a number of categories, such as fuel combustion in industrial and manufacturing facilities and industrial off-road equipment.

consumer products (e.g., detergents, cosmetics), and miscellaneous sources (e.g., residential fuel combustion, commercial cooking, road dust, construction, and demolition operations).

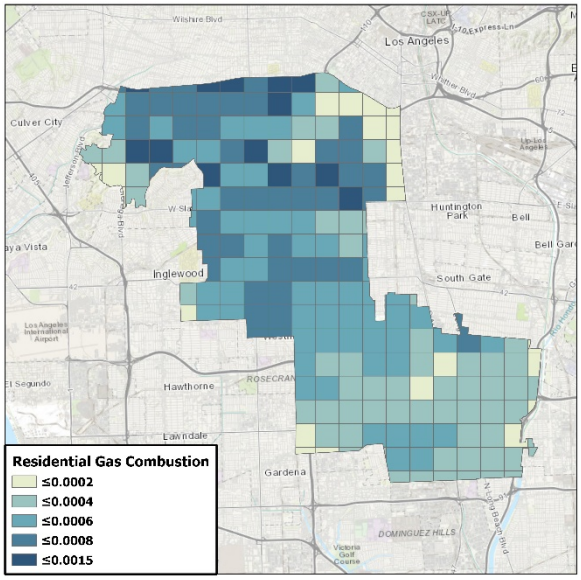
Figure 2d-6: Areawide Sources of Pollution in SLA

Areawide emissions are estimated using socio-economic parameters and land-use, such as population, housing, employment, and fuel consumption to calculate emissions at a county level, and then are geographically allocated using surrogate information specific to each source. **Figure 2d-7** presents examples of geographic distribution that are representative of areawide sources.

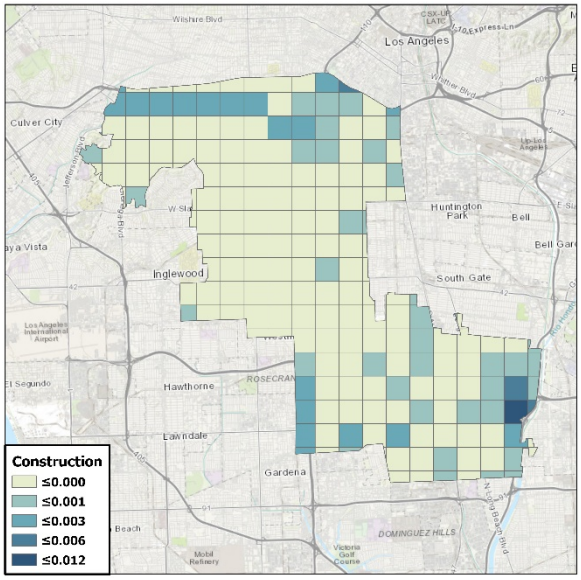
Figure 2d-7: Examples of Geographic Distribution of Various Areawide Sources in SLA



(a) Cooking (b) Paved Road Dust



(c) Residential Gas Combustion



(d) Construction Activity

Mobile Sources

Examples of mobile (on- and off-road) sources of air pollution within the community include traveling on major freeways – Interstate 10 (I-10), Interstate 110 (I-110), Interstate 105 (I-105), Interstate 710 (I-710), State Route 91 (SR-91) – and the Slauson Corridor and Alameda Corridor rail line. Additional examples are provided in the On-Road Sources and Off-Road Sources as follows.

On-Road Sources

On-road sources include any vehicle that drives along regular roads and freeways. These include passenger vehicles, light-, medium-, and heavy-duty trucks, buses, coaches, motorhomes, and motorcycles (**Figure 2d-8**).

On-road emissions are estimated using Southern California Association of Governments' (SCAG's)[18] travel demand information on vehicle activity and emission factors from the Emission Factor (EMFAC) 2017 model.[19] EMFAC[20] is a model developed by CARB that estimates the official emissions inventories of on-road mobile sources in California. Emissions are geographically distributed along the major freeways and local streets.

[18] SCAG, https://scag.ca.gov/

[19] CARB, Mobile Source Emissions Inventory – Modeling Tools - EMFAC software and technical support documentation, https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools-emfac-software-and

[20] CARB, EMFAC, https://arb.ca.gov/emfac/

Figure 2d-8: Examples of On-Road Sources in SLA

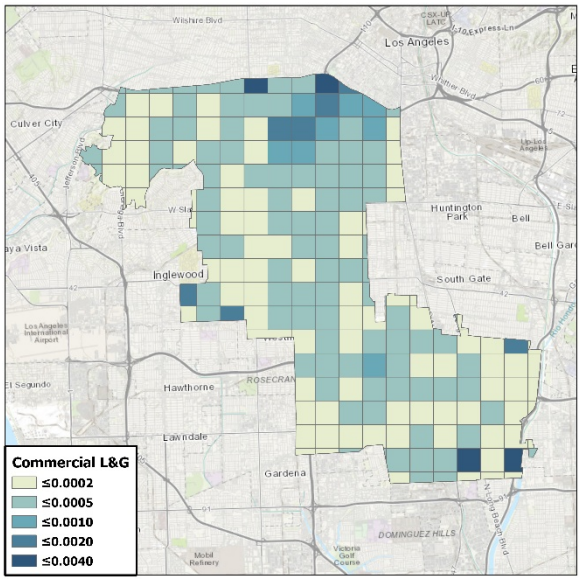
Off-Road Sources

Off-road sources include any mobile vehicle that operates off-road. These include trains, construction equipment, forklifts, lawn and garden equipment, transportation refrigeration units (TRUs), among many other types of equipment (**Figure 2d-9**). Off-road equipment emissions are estimated by CARB, which developed a suite of models that are specific to the type of off-road equipment,[21] and are geographically allocated using representative surrogate information for each type of equipment. **Figure 2d-10** presents examples of the geographic distribution of some off-road sources that contribute to air pollutant emissions in the community.

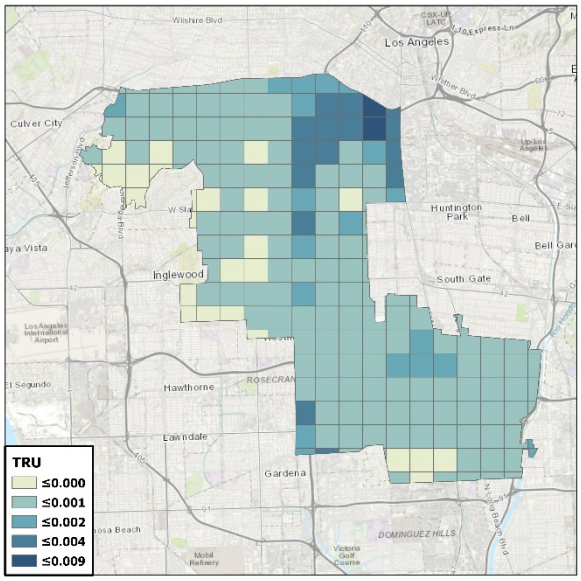
[21] CARB, Mobile Source Emissions Inventory – Off-road Documentation, https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-road-documentation-0

Figure 2d-9: Examples of Off-Road Sources in SLA

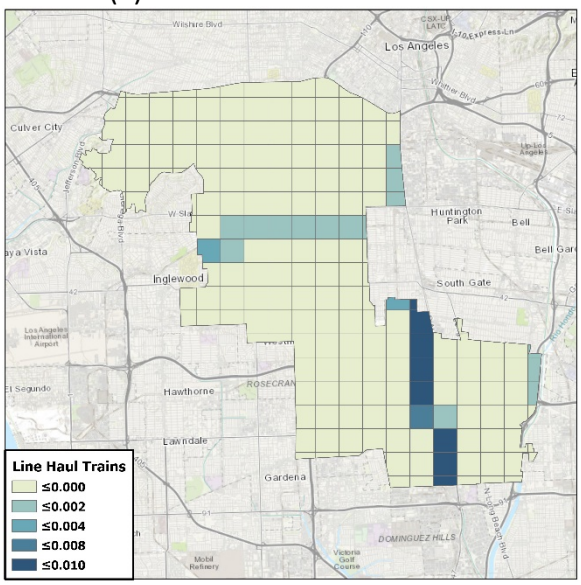
Figure 2d-10: Examples of Geographic Distribution of Off-Road Sources in SLA



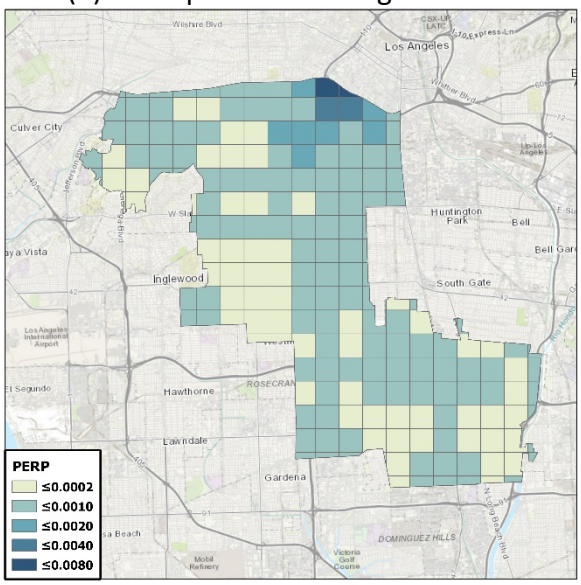
(a) Commercial Lawn & Garden



(b) Transportation Refrigeration Units



(c) Line Haul Trains



(d) Portable Off-Road Equipment

Baseline Emissions Inventory (Year 2019)

The emissions inventory for this community is developed following the methodology described in detail in the Source Attribution Methodology Report.[2] As described above, emissions are aggregated at one square kilometer grid resolution for the entire Basin, and the emissions from

the SLA community correspond to the emissions of the grid squares that are included within the community boundary.

Emissions from Facilities that Report Their Emissions in Annual Emissions Reporting to South Coast Air Quality Management District

In total, there are 43 facilities in SLA that are currently required to report annual emissions in the AER program. Total emissions from those facilities are grouped by industry in **Table 2d-2**. Facilities manufacturing fabricated metals are the largest source of ROGs and TACs, whereas petroleum refining and related industries are the largest sources of NOx and PM2.5. As shown in **Table 2d-2**, the overall contribution of reporting facilities to total emissions in the community is relatively small, with up to three percent of total ROG, NOx and PM2.5 emissions, and less than one percent of total TAC emissions.

Table 2d-2: Emissions from Facilities in SLA Required to Report to AER

Facility Type	Emissions (pounds per day)			
	ROG	NOx	PM2.5	Total TACs*
Automotive Repair, Services, and Parking	9.47	0.27	0.37	0.00
Educational Services	7.70	103.47	7.88	0.01
Electric, Gas, and Sanitary Services	1.40	0.74	0.05	0.00
Fabricated Metal Products	138.67	27.14	18.45	1.59
Food and Kindred Products	0.00	0.00	11.91	0.00
Furniture and Fixtures	17.92	0.00	0.83	0.00
Health Services	9.49	52.15	9.51	0.02
Industrial and Commercial Machinery	0.44	1.99	0.12	0.00
Lumber and Wood Products, Except Furniture	0.00	0.00	0.12	0.00
Miscellaneous Repair Services	2.66	0.00	0.21	0.00
Miscellaneous Retail	26.06	0.00	0.00	0.02
Motor Freight Transportation and Warehousing	20.75	0.00	0.73	0.00
Oil and Gas Extraction	84.97	32.03	3.04	0.08
Paper and Allied Products	5.43	0.00	0.00	0.00
Petroleum Refining and Related Industries	83.34	189.98	38.63	0.09
Primary Metal Industries	1.64	16.10	1.80	0.00
Rubber and Miscellaneous Plastics Products	93.34	0.20	0.00	0.00
Stone, Clay, Glass, and Concrete Products	0.11	0.93	4.38	0.00
Textile Mill Products	99.51	55.44	10.76	0.00
Wholesale Trade-non-durable Goods	91.22	1.50	0.18	0.04
Total (pounds per day)	694.10	481.95	108.97	1.86
Total (tons per day)	0.35	0.24	0.05	<0.01

*Total TACs is calculated by the sum of individual TAC emissions multiplied by the cancer potency relative to DPM

Emissions from All Sources

The emissions from all sources in SLA are summarized in **Table 2d-3**. This includes emissions of NOx, ROG, and PM2.5 (in tons per day) and DPM and total TACs (in pounds per day).

Table 2d-3: Emissions from all Sources in SLA in 2019

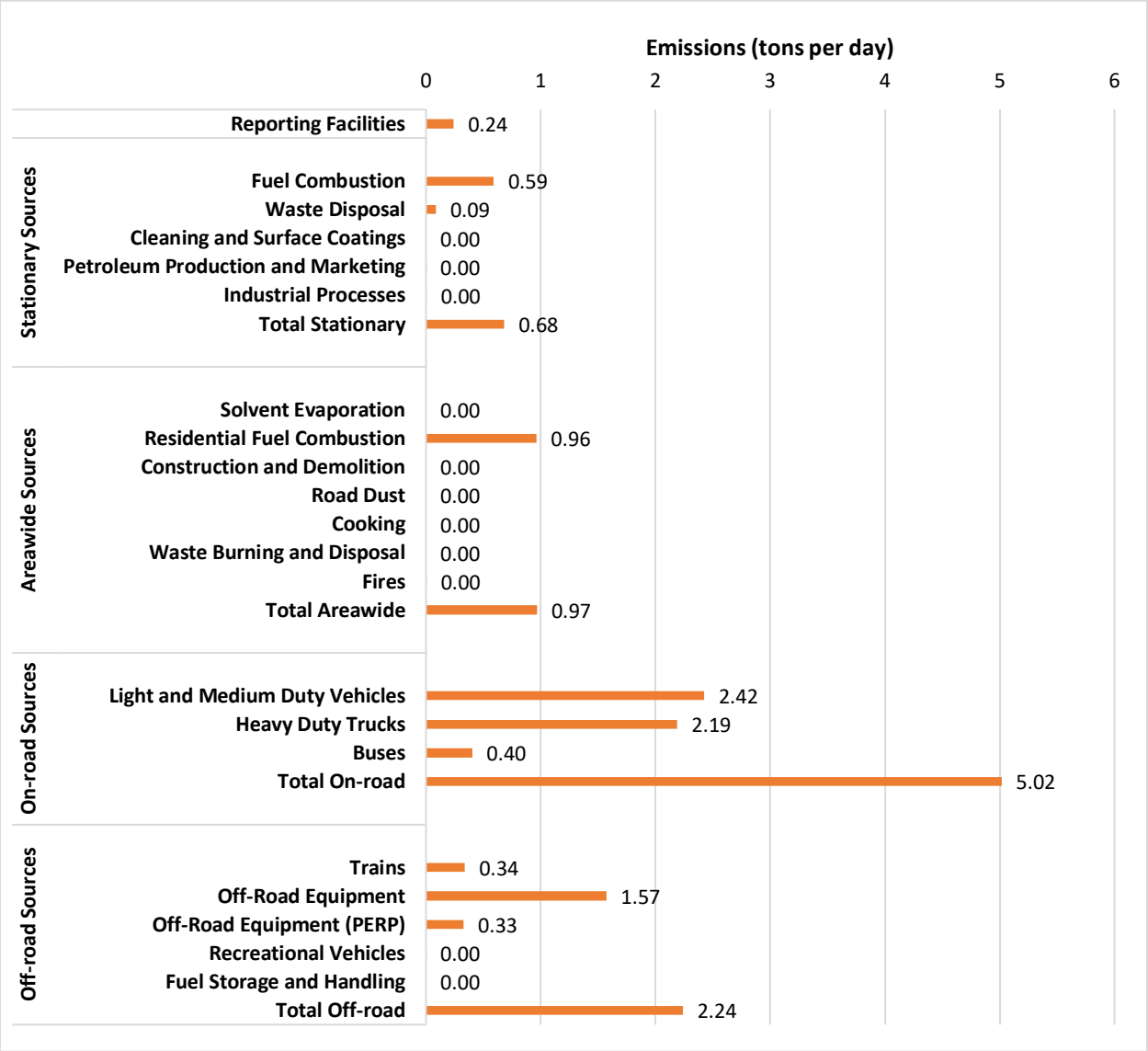
		Emissions (tons per day)			Emissions (pounds per day)	
		ROG	NOx	PM2.5	DPM	Total TACs*
Reporting Facilities						
Total Reporting Facilities		**0.35**	**0.24**	**0.05**	**0.00**	**1.86**
Stationary Sources						
	Fuel Combustion	0.03	0.59	0.04	0.00	5.09
	Waste Disposal	0.22	0.09	0.00	0.00	0.07
	Cleaning and Surface Coatings	1.53	0.00	0.04	0.00	6.28
	Petroleum Production and Marketing	0.46	0.00	0.00	0.00	0.53
	Industrial Processes	0.07	0.00	0.17	0.00	8.69
	Total Stationary	**2.30**	**0.68**	**0.25**	**0.00**	**20.65**
Areawide Sources						
	Solvent Evaporation	5.99	0.00	0.00	0.00	1.22
	Residential Fuel Combustion	0.33	0.96	0.27	0.00	2.39
	Construction and Demolition	0.00	0.00	0.05	0.00	0.72
	Road Dust	0.00	0.00	0.18	0.00	0.24
	Cooking	0.03	0.00	0.36	0.00	0.54
	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00
	Fires	0.01	0.00	0.02	0.00	0.02
	Total Areawide	**6.36**	**0.97**	**0.88**	**0.00**	**5.13**
On-Road Sources						
	Light and Medium Duty Vehicles	2.94	2.42	0.34	4.54	32.47
	Heavy Duty Trucks	0.17	2.19	0.07	77.70	79.92
	Buses	0.04	0.40	0.02	8.72	13.50
	Total On-Road	**3.15**	**5.02**	**0.42**	**90.96**	**125.89**
Off-Road Sources						
	Locomotives	0.02	0.34	0.01	16.94	17.17
	Off-Road Equipment	2.33	1.57	0.08	92.41	122.25
	Portable Off-Road Equipment (PERP)	0.03	0.33	0.01	25.10	25.52
	Recreational Vehicles	0.11	0.00	0.00	0.00	0.17
	Fuel Storage and Handling	0.30	0.00	0.00	0.00	0.30
	Total Off-Road	**2.79**	**2.24**	**0.10**	**134.45**	**165.41**
Total		**14.95**	**9.14**	**1.70**	**225.42**	**318.94**

*Total TACs is calculated by the sum of individual TAC emissions multiplied by the cancer potency relative to DPM

Nitrogen Oxides Sources in South Los Angeles

In this community, on-road mobile sources are the largest emitters of NOx, with passenger vehicles and heavy-duty trucks contributing equally. Off-road mobile sources are the second largest contributor to NOx and include off-road equipment and trains. Stationary sources of NOx are mainly from fuel combustion in industrial activities and for space and water heating at commercial businesses and homes. **Figure 2d-11** shows the breakdown of NOx sources in the community.

Figure 2d-11: Contribution of Major Source Categories to NOx Emissions in SLA in 2019

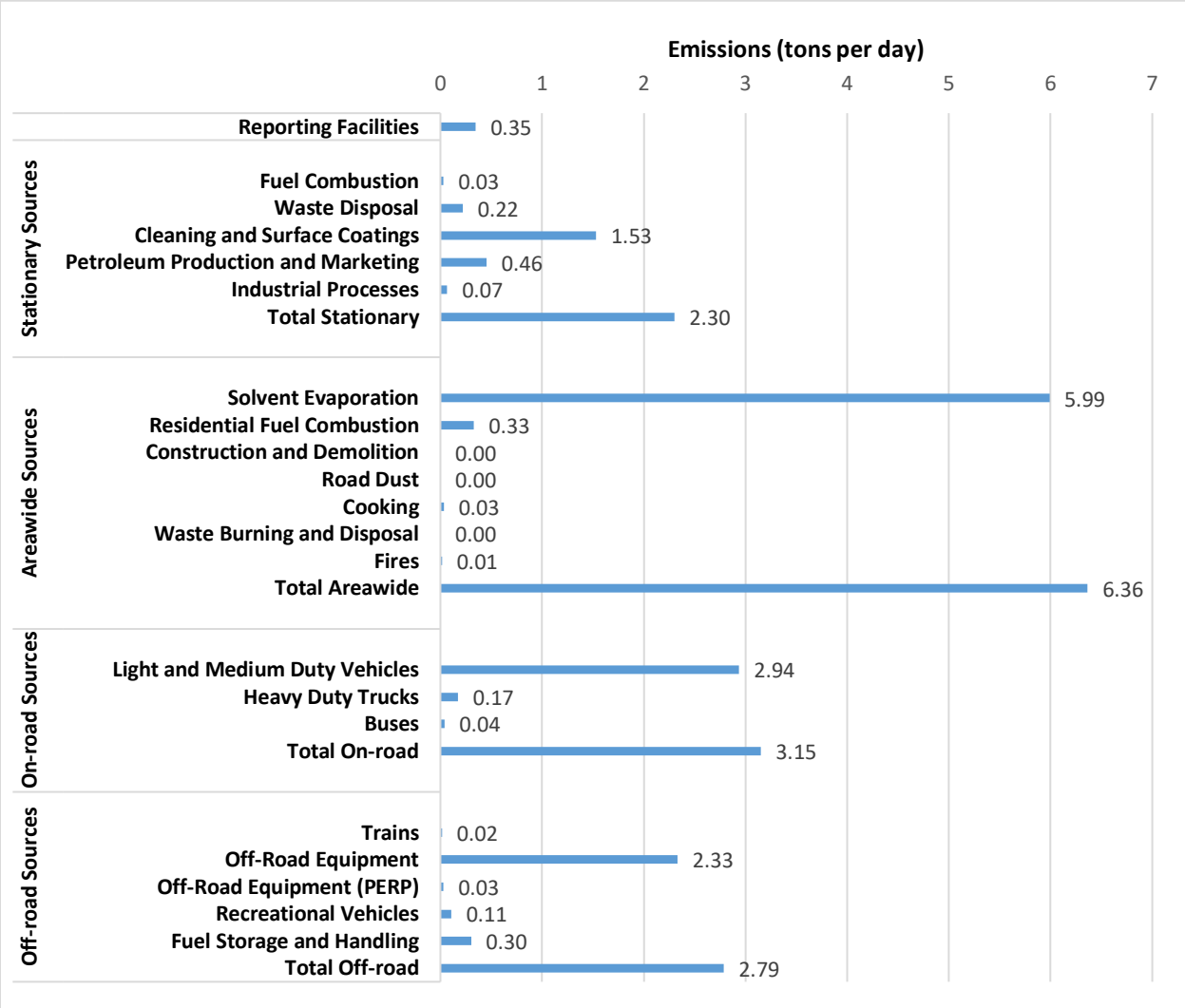


Reactive Organic Gas Sources in South Los Angeles

Figure 2d-12 summarizes the breakdown of ROG sources in SLA. Solvent evaporation[22] (mostly from consumer products and architectural coatings), and emissions from processes related to cleaning and surface coatings contribute to about two-thirds of the total ROG emissions in SLA. Mobile sources contribute to the remaining one-third of the ROG emissions, with light-duty vehicle exhaust and evaporative emissions being the largest contributor.

[22] Solvent evaporation refers to the emissions from household and commercial product that typically include volatile compounds. These products include cleaning and disinfecting agents, body care and cosmetics, paint and adhesives, products for automotive care, and paint, primers, coatings, and sealers used for architectural coatings. These emissions are not from industries manufacturing the products, but rather from the use of the products by consumers.

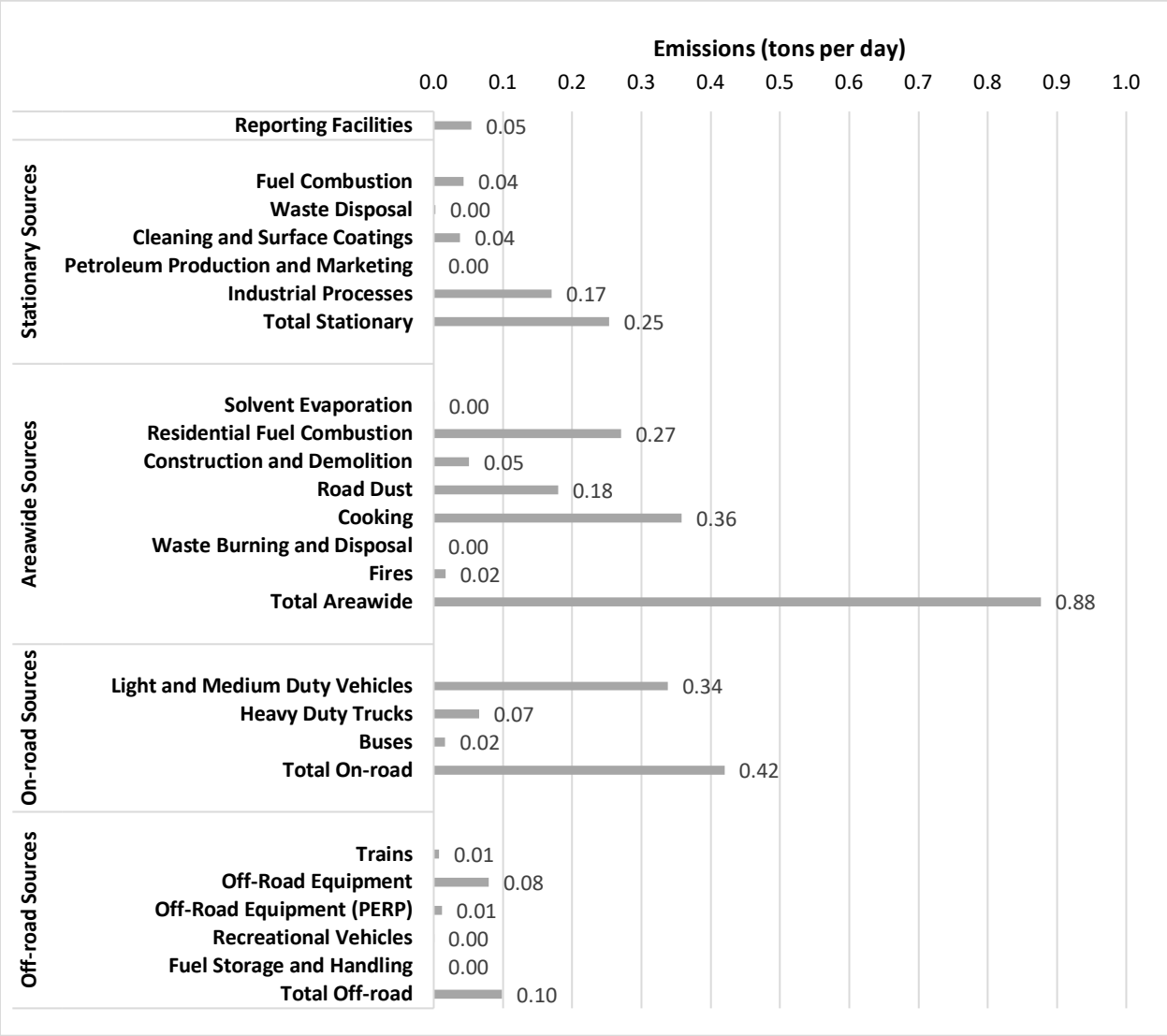
Figure 2d-12: Contribution of Major Source Categories to ROG Emissions in SLA in 2019



Fine Particulate Matter (PM2.5) Sources in South Los Angeles

Figure 2d-13 summarizes the breakdown of PM2.5 sources in SLA. Areawide sources are the largest contributors to PM2.5 emissions with commercial cooking and residential fuel combustion as the major sources. PM2.5 is also emitted from industrial processes, vehicle exhaust, and tire and brake wear. Road dust, another contributor of PM2.5 emissions, is related to vehicles traveling on roads but is considered as an areawide source.

Figure 2d-13: Contribution of Major Source Categories to PM2.5 Emissions in SLA in 2019



Toxic Air Contaminant Emissions

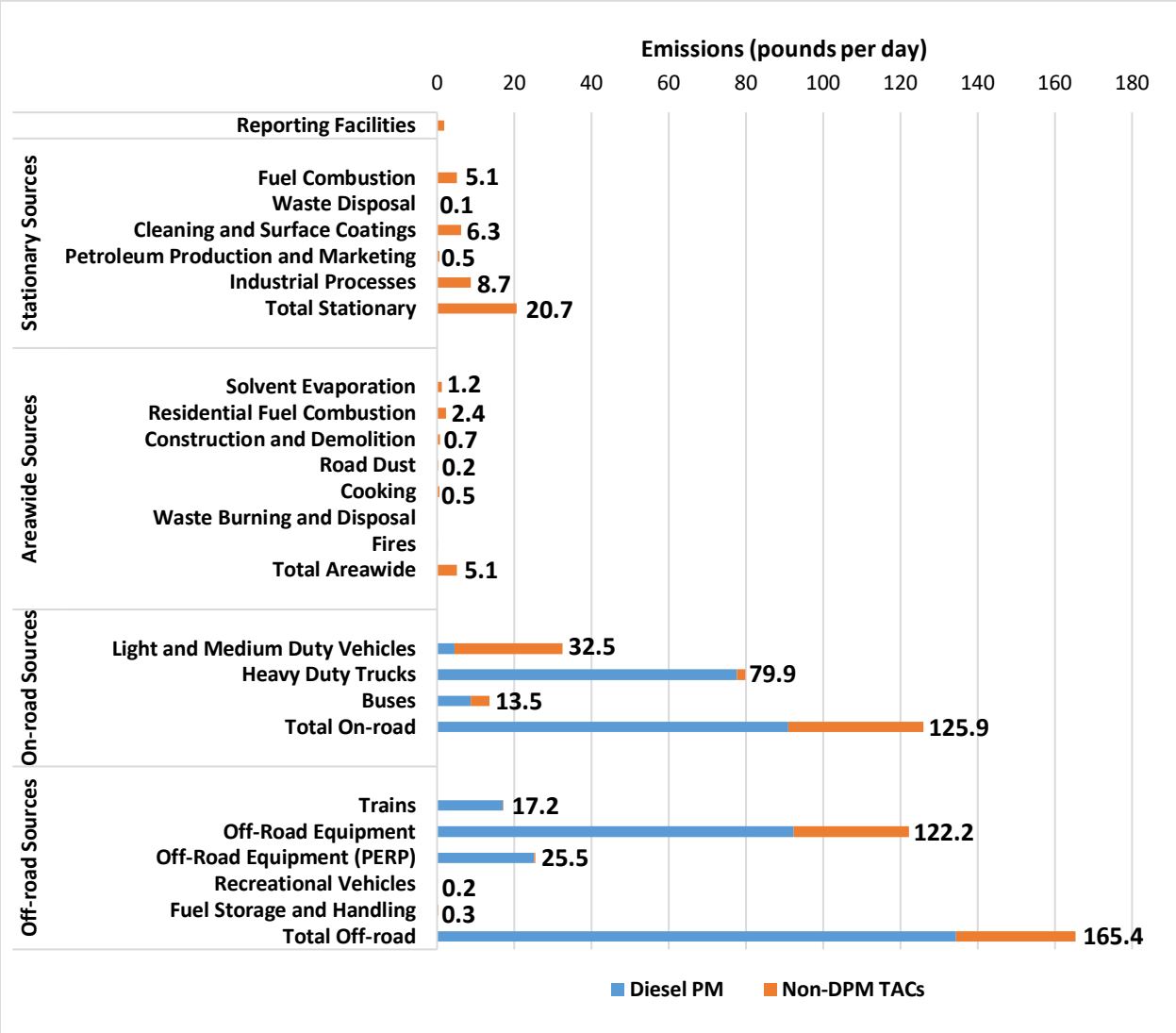
In total, 21 TACs were analyzed and included in this report. Facilities reporting to AER are required to report TAC emissions under South Coast AQMD's AER and AB 2588 Air Toxics Hot Spots programs.[23] The AB 2588 Program is a statewide program that focuses on reducing TACs pollution from facilities and requires facilities above certain levels to disclose and/or reduce risks. The AB 2588 program is implemented at South Coast AQMD through Rule 1402[24] requiring certain facilities to conduct Health Risk Assessments to assess the health risk (long-term versus short-term) to the surrounding community. Currently, there are no AB 2588 facilities in SLA that require

[23] South Coast AQMD, Overview of the AB 2588 Program, https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/iws-facilities/dice/dice-b1

[24] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf

risk reduction per AB 2588 requirements. Please refer to **Table A2a-2** in Appendix 2a: Community Profile for a list of facilities in the AB 2588 program within SLA. TAC emissions from all the remaining sources are estimated using the same emission modeling tools described above. The most prevalent TAC in the community is DPM, followed by 1,3-butadiene, benzene, formaldehyde, and hexavalent chromium. The contribution from major emission categories to TAC emissions in SLA is presented in **Figure 2d-14**.

Figure 2d-14: Contribution of Major Source Categories to TAC Emissions in SLA



A brief summary of the main sources of TACs in SLA are as follows:

- DPM is the most prevalent TAC in the community and is emitted from diesel on-road and off-road vehicles. Also, mobile sources are the major contributor to all the other major TACs: 1,3 butadiene, benzene, formaldehyde, and hexavalent chromium.
- Plastic production in the chemical industry is another major contributor to 1,3-butadiene.
- Fuel combustion in industrial, commercial, and residential sectors contribute to benzene and formaldehyde emissions.
- Industrial activities related to laundering, degreasing, and coatings contribute to emissions of methylene chloride, perchloroethylene, and cadmium.

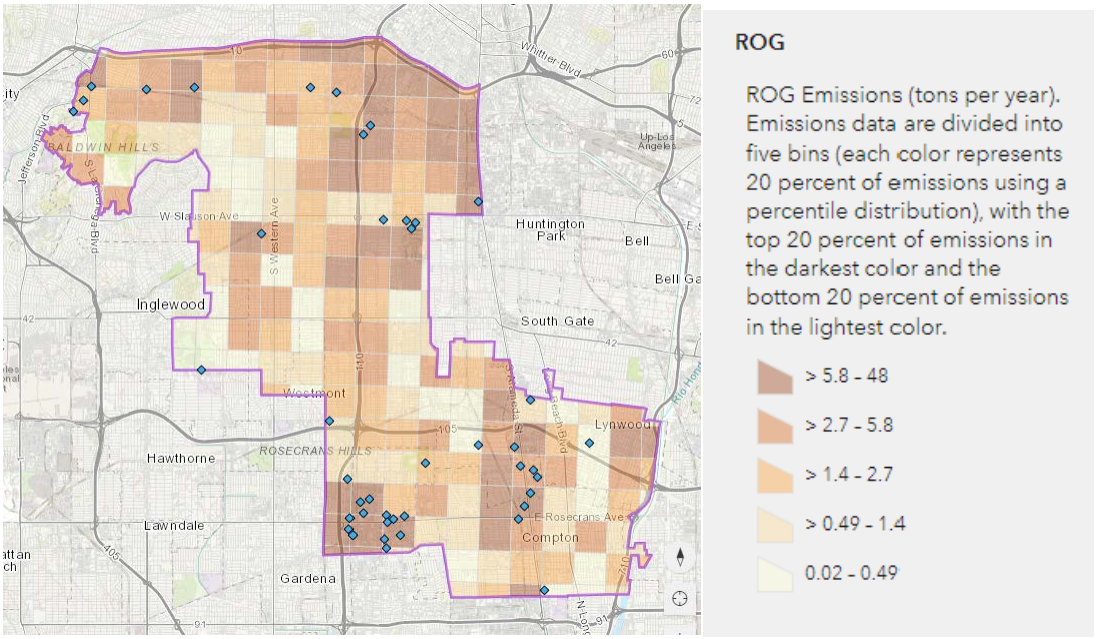
A detailed emission inventory by major source category is provided in Appendix 2d: Source Attribution Analysis.

Emissions by Source Category

As mentioned above, four major categories are identified for the emissions inventory: facilities (stationary sources), areawide, on-road, and off-road sources. Figures are included to show the geographic distribution of each category.

Figure 2d-15 and **Figure 2d-16** present the geographic distribution of ROG emissions from stationary and areawide sources, respectively. ROG includes some TACs like benzene, formaldehyde, and 1,3-butadiene. Areawide emissions include emissions from solvent evaporation and miscellaneous processes (e.g., residential fuel combustion commercial cooking), and populated areas. The highest areawide emissions occur across populated areas. Stationary sources include the facilities that report to AER and smaller aggregated industrial sources. Some hot spots of ROG emissions are concentrated near these AER reporting facilities in SLA, whereas other areas with high ROG emissions are near commercial and industrial activities related to cleaning and surface coatings. Note that reported emissions from AER facilities account for less than one percent of the overall toxicity-weighted TAC emissions in the community. **Figure 2d-17** and **Figure 2d-18** present the geographic distribution of DPM emissions from on-road and off-road sources, respectively. The highest emissions from on-road sources are aligned with the main transportation corridors. Off-road emissions come from a variety of sources, but the highest emissions are near industrial areas or near railroad tracks.

Figure 2d-15: ROG Emissions from Stationary Sources* in SLA



*Includes AER reporting facilities and aggregated small stationary sources.

Figure 2d-16: ROG Emissions from Areawide Sources in SLA

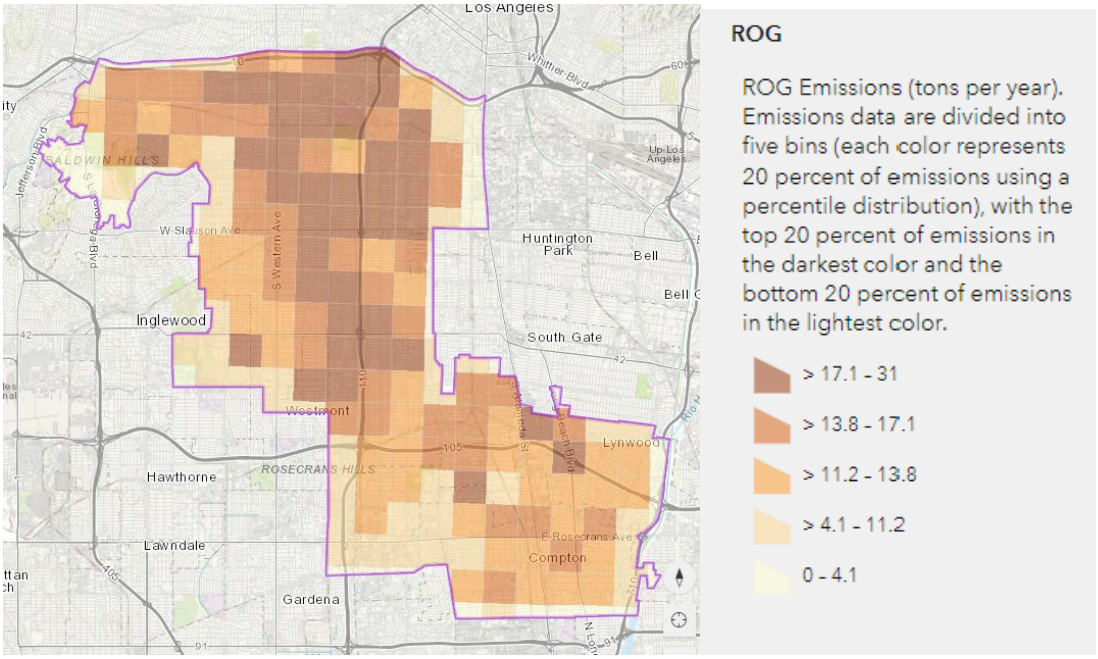


Figure 2d-17: DPM Emissions from On-Road Sources in SLA in 2019

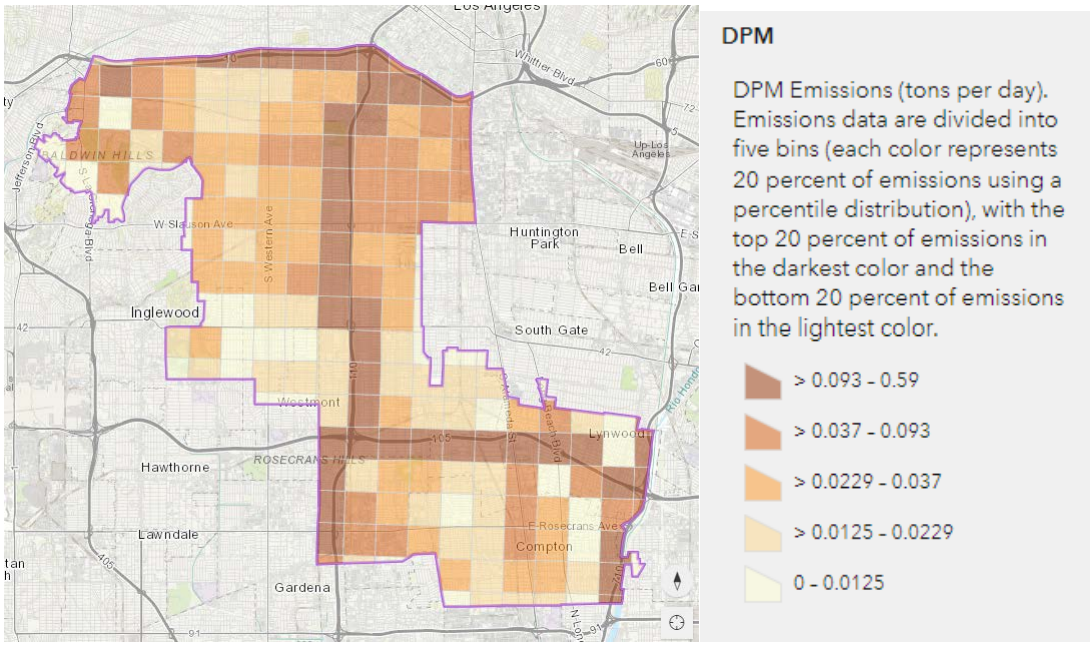
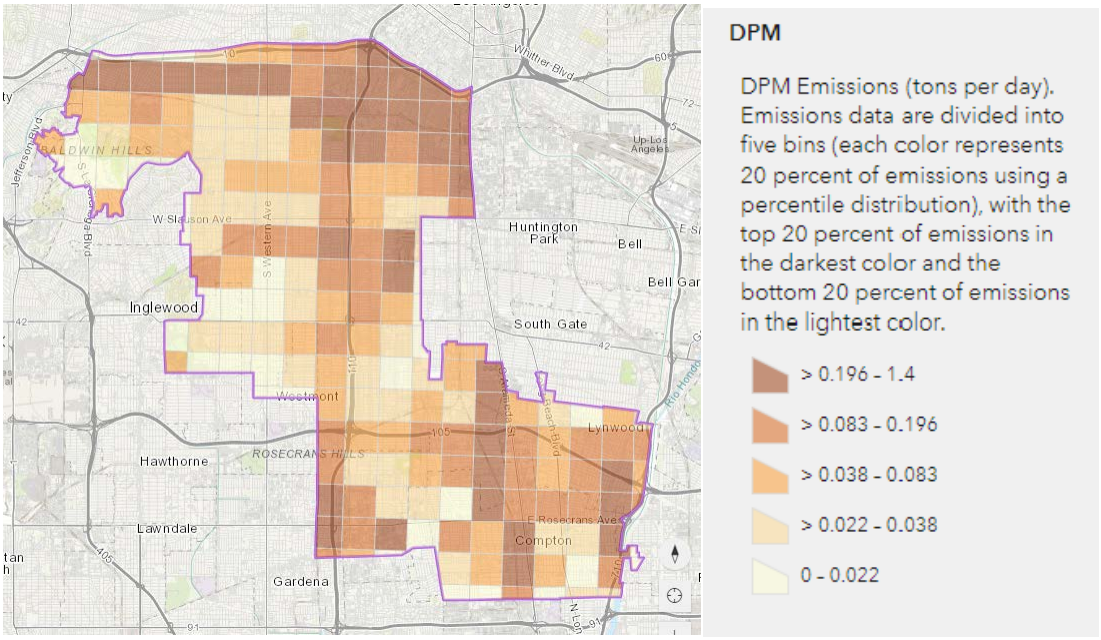


Figure 2d-18: DPM Emissions from Off-Road Sources in SLA in 2019



Future Year Baseline Emissions Inventory

As part of the source attribution analysis and along with CARB guidance, projected emission trends are determined for two future milestone years, 2026 and 2031. Future emissions of criteria pollutants and TACs in SLA are projected using the best available information for population growth, economic growth, and emissions adjustments that reflect the ongoing implementation of existing regulations. The estimates shown here do not reflect the potential impact of any new programs or measures not yet approved, and/or included in this CERP. The community boundary includes a variety of facilities subject to rules targeting toxic emissions. Furthermore, on-road DPM emissions from heavy-duty diesel vehicles are subject to CARB's Truck and Bus Regulation.[25] Off-road diesel equipment is also subject to state regulations that will reduce DPM and NOx emissions and the South Coast AQMD has also developed and implemented various regulations and programs to reduce NOx and ROG emissions from stationary and mobile sources. A detailed emission inventory by major source category for future years is provided in the Appendix 2d.

Figure 2d-19 presents the projected trend in major criteria air pollutant emissions (NOx, ROG, and PM2.5) in SLA from 2019 to the two milestone years, 2026 and 2031. NOx emissions in the community are expected to decrease substantially between 2019 and 2031, due to the existing regulations and incentive programs for mobile and stationary sources. The transition of South Coast AQMD's RECLAIM program, which covers the largest NOx stationary sources, to a

[25] CARB, Truck and Bus Regulation, https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about

command-and-control regulatory structure[26] are expected to bring a significant amount of NOx emission reductions as well. ROG emissions are also expected to decrease between the years 2019 and 2031, mostly due to cleaner vehicle emissions. Unlike NOx and ROG emissions, PM2.5 emissions remain virtually unchanged during the period from 2019 to 2031. While some sources of PM2.5 (e.g., on- and off-road vehicles) are expected to decline due to vehicle emissions regulations, other sources that are not regulated (e.g., road dust, construction dust, cooking) are expected to increase because their emissions are strongly related to population, and population is projected to increase.

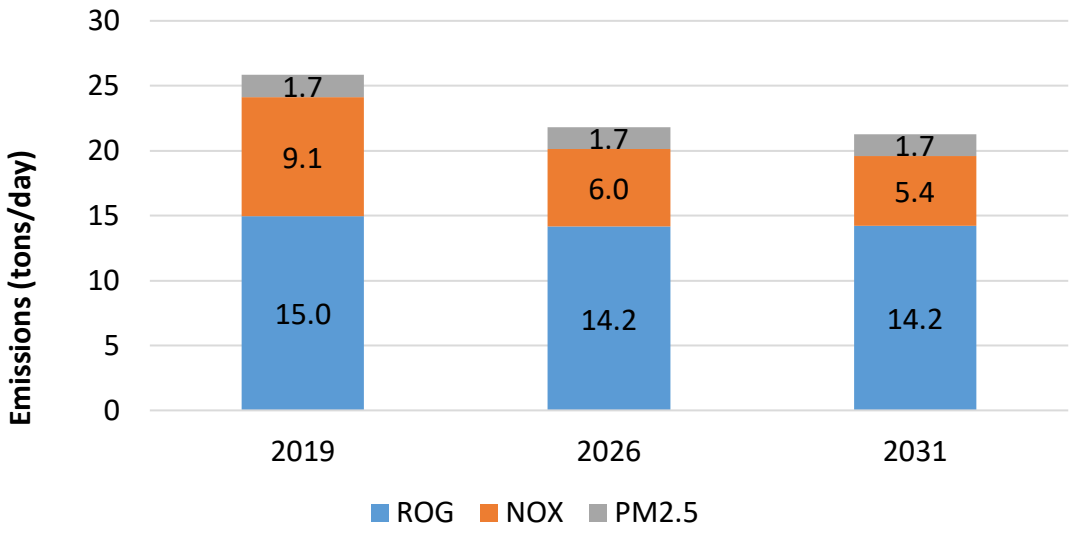
Trends for TAC emissions are shown in **Figure 2d-20** and are summarized here:

- DPM continues to dominate the TAC emissions inventory in future years, despite a significant reduction in DPM from heavy-duty trucks through statewide measures (ongoing and newly proposed regulations). See Chapter 5a: Introduction to Actions to Reduce Community Air Pollution for additional information on statewide measures.
- DPM is expected to decrease by 61 percent from 2019 through 2031 due to existing diesel vehicle emission regulations and turnover from older, higher polluting vehicles to cleaner vehicles
- The second largest contributor from TACs is 1,3-butadiene. These emissions are anticipated to decrease due to existing vehicle emission regulations and turnover from older, higher polluting vehicles to cleaner vehicles.
- Benzene and formaldehyde emissions are also expected to decrease throughout the 12-year period due to overall emission reductions from vehicles resulting from ongoing implementation of existing vehicle emission regulations and turnover from older, higher polluting vehicles to cleaner vehicles
- Hexavalent chromium emissions are expected to decrease from 2019 to 2031 due to a decrease in vehicle emissions despite a slight increase in industrial emissions. Industrial activity is projected to increase based on SCAG's economic trends, which will result in an increase in emissions of pollutants if no new regulations or more stringent requirements are established.
- Emissions of perchloroethylene, methylene chloride and cadmium are not expected to change much with existing regulations.

[26] Command-and-control regulatory structure is a direct regulation with specified emissions limits as opposed to the market-based approach of RECLAIM.

It is important to note that many of the South Coast AQMD regulations addressing toxic metal emissions from industrial facilities (e.g., South Coast AQMD Rule 1407.1[27] and Rule 1469[28]) include requirements to reduce fugitive metal toxic particulate emissions. Fugitive metal particulate emissions can make up a portion of the toxic metal emissions from a metal processing facility but are often difficult to quantify because there are no widely accepted emission estimation methods established. The inventories shown here may not illustrate an overall decrease in toxic metal emissions, but existing regulations, in particular requirements to reduce fugitive metal toxic particulate emissions, are expected to result in overall decreased emissions. The analysis presented in this section is a regional analysis evaluating total TAC emissions. This analysis is different than a localized health risk assessment which takes into account specific parameters (e.g., temperature, stack height, distance from nearby receptors) about the emission sources within a facility, the proximity and types of receptors around the facility, and local meteorological conditions.

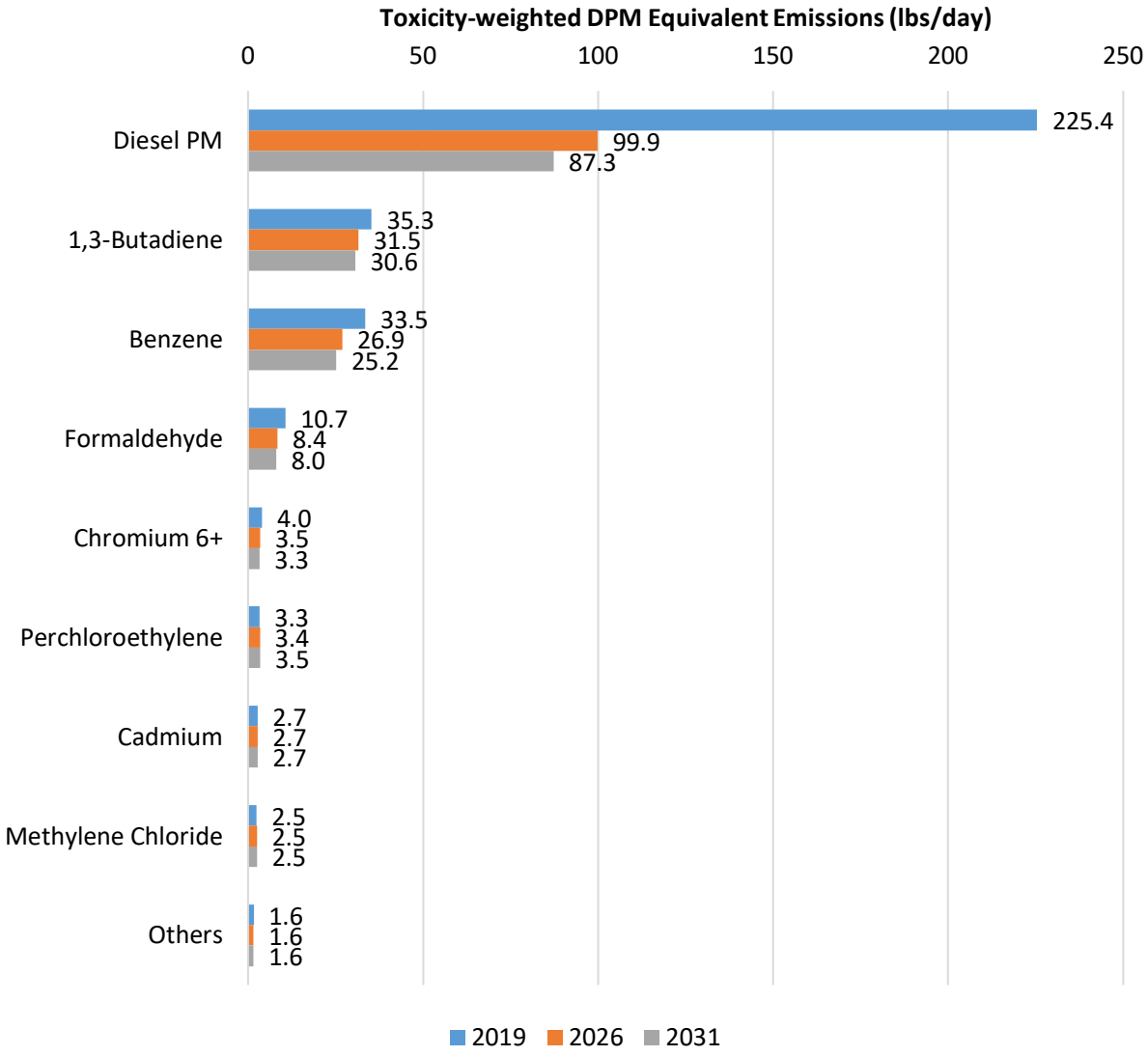
Figure 2d-19: Total Emission Trends for NOx, ROG, and PM2.5 in SLA for 2019, 2026, and 2031



[27] South Coast AQMD, Rule 1407.1 – Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1407-1.pdf?sfvrsn=18

[28] South Coast AQMD, Rule 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf

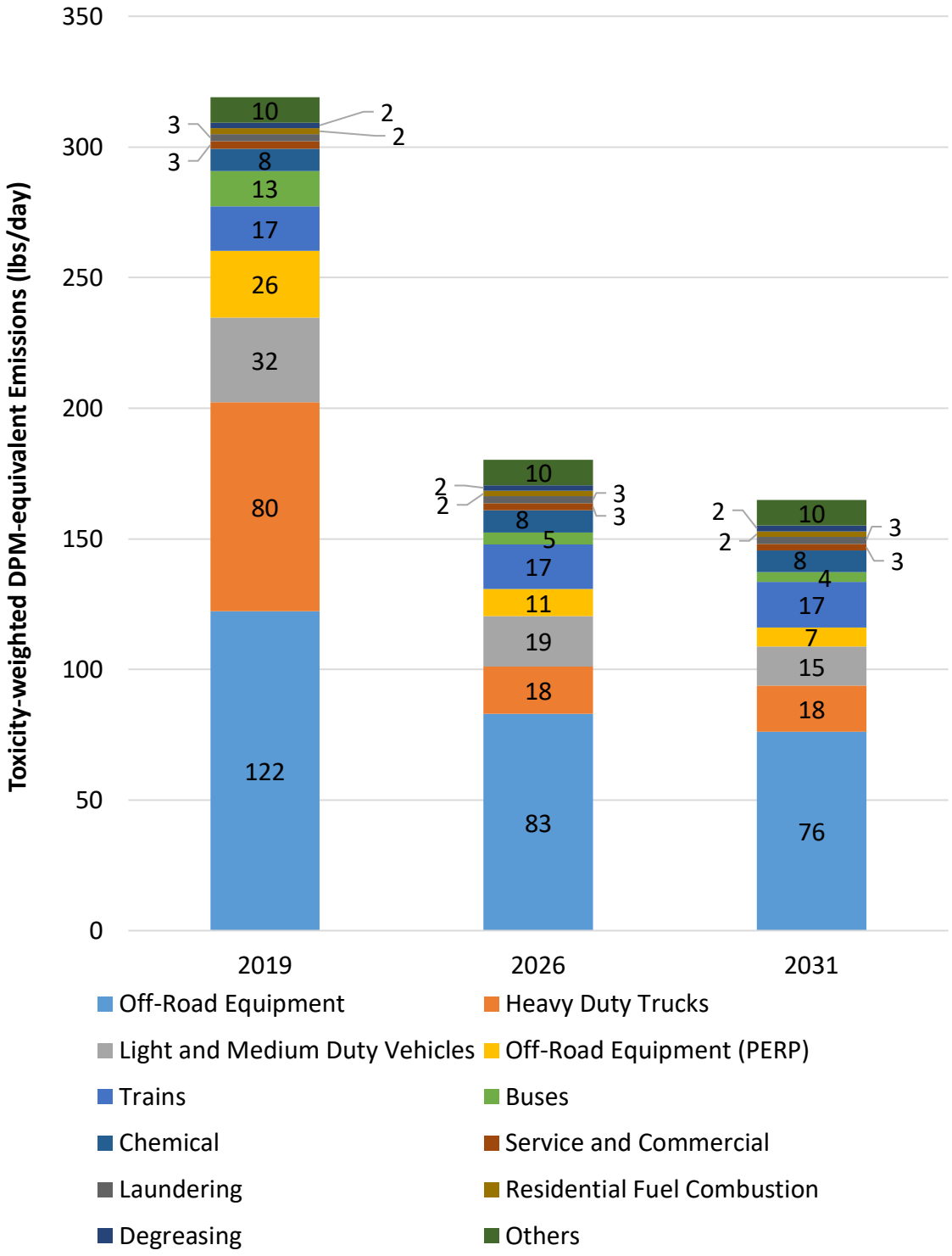
Figure 2d-20: Total Emission[†] Trends for TACs in SLA for 2019, 2026, and 2031



[†]Cancer potency-weighted diesel-equivalent emissions.

Figure 2d-21 presents the total TAC emissions by the major emission categories for the three years of interest. The overall toxicity-weighted emissions decrease between 2019 and 2031. In particular, emissions from diesel heavy-duty trucks and off-road equipment are expected to decrease substantially over the 12-year period, reducing overall TAC emissions. While TAC emissions from mobile sources are expected to decrease over time, emissions from stationary sources in facilities can still affect the nearby population, if these emissions are not remediated.

Figure 2d-21: TAC Emissions from All Sources in SLA



~Shown by major categories.

Summary

Sources of air pollutant emissions in SLA include on-road vehicles, trains, off-road equipment, and various industrial activities.

Figure 2d-22 summarizes the baseline (Year 2019) emissions inventory and **Figure 2d-23** summarizes the projected trends (Years 2026 and 2031) in the major air pollutants in SLA.

Figure 2d-22: Baseline Emissions Inventory in SLA for 2019

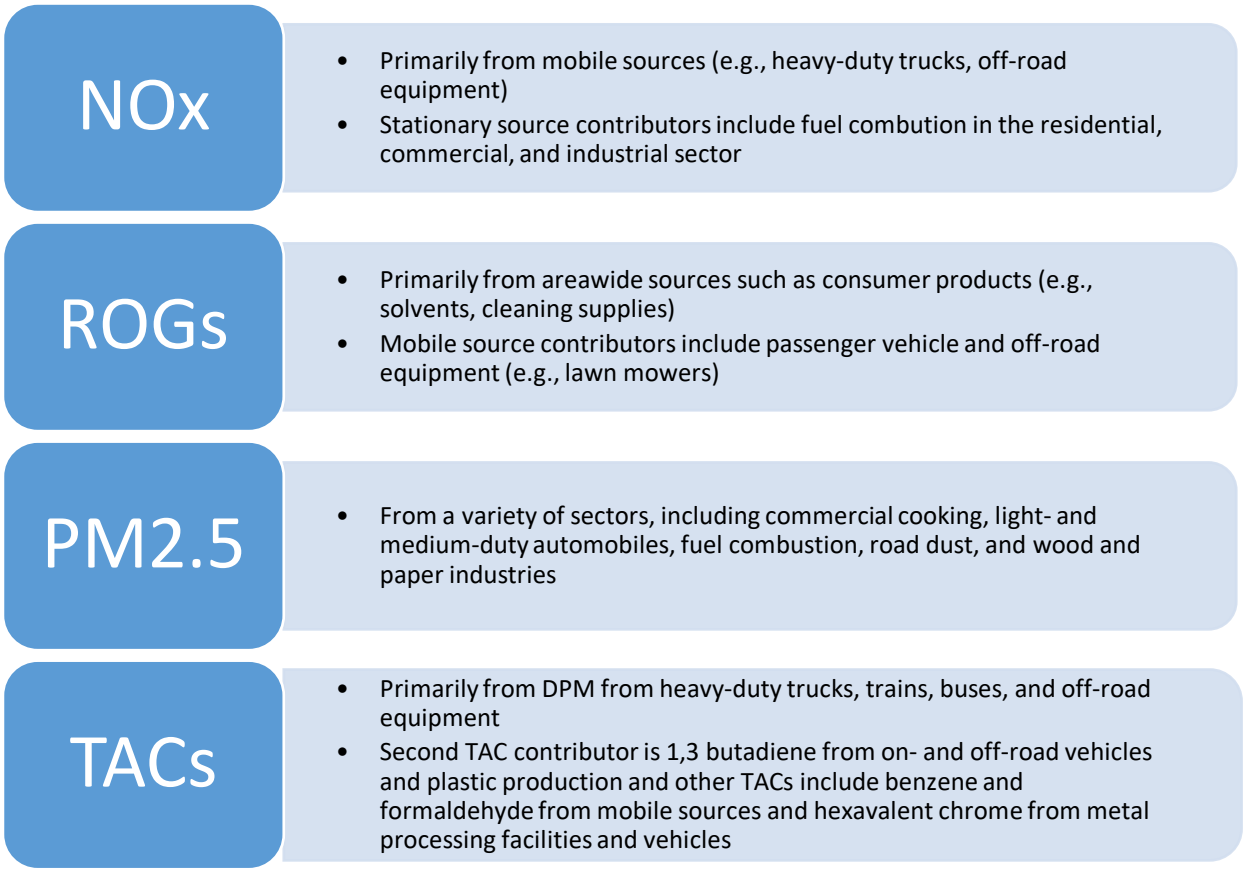
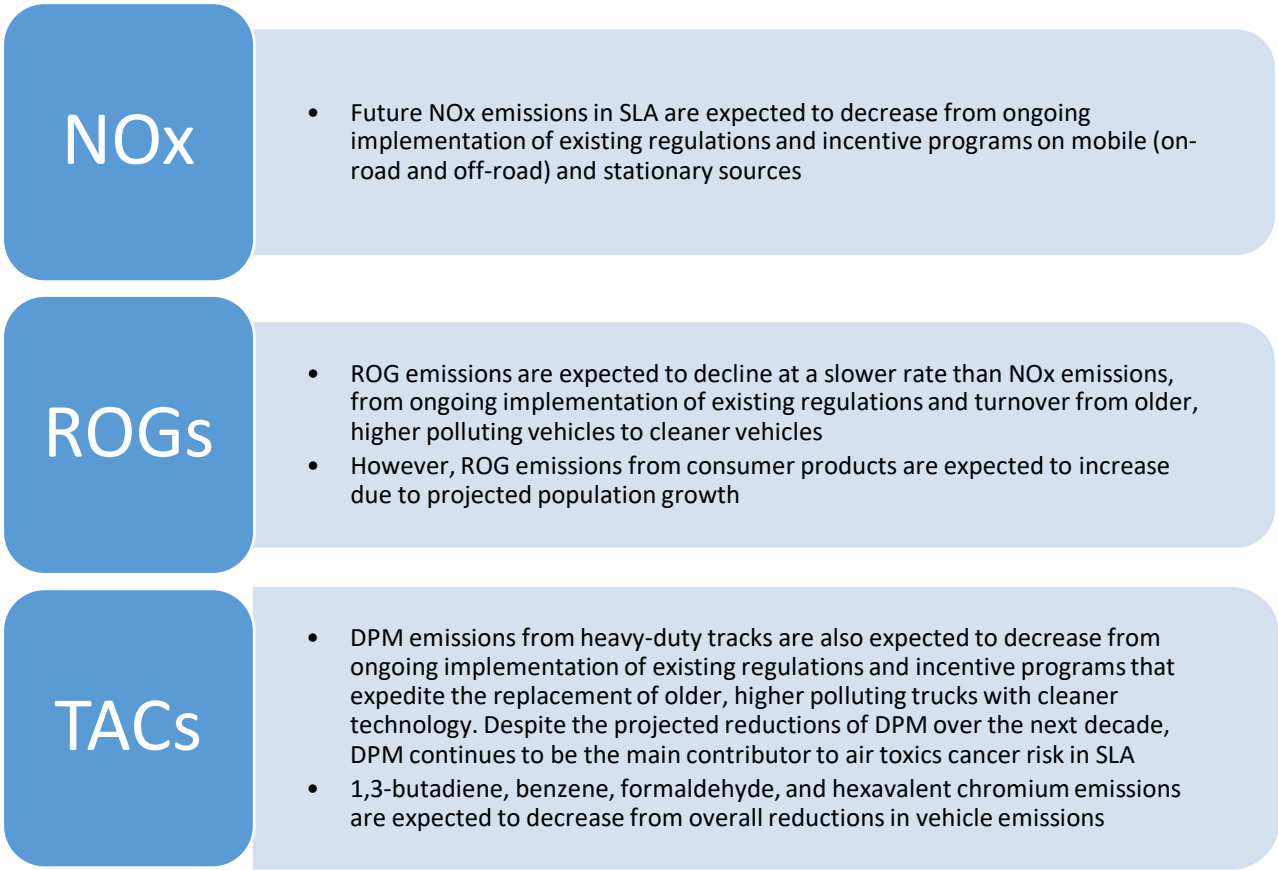


Figure 2d-23: Projected Trends in Major Air Pollutants in SLA for 2026 and 2031



Chapter 3

Community Outreach, Community Steering Committee, Community Engagement, and Public Process

Introduction

Chapter 3 Highlights

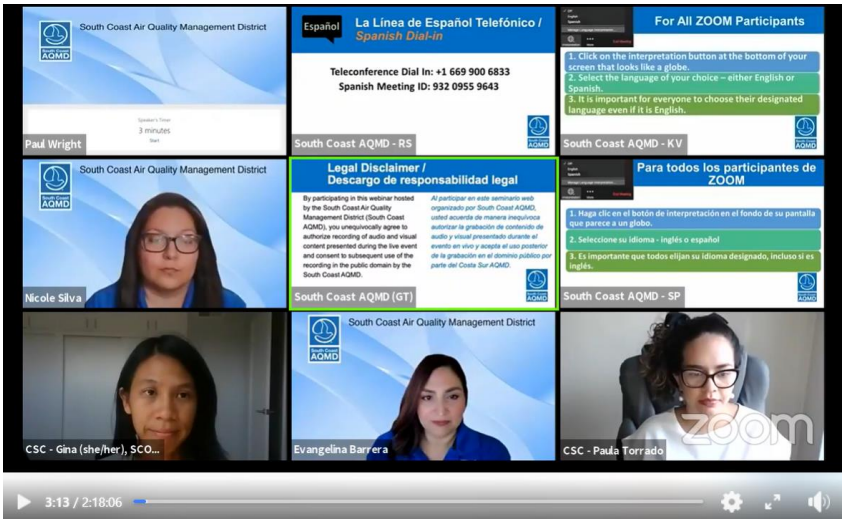
- The CSC and community co-leads worked with South Coast AQMD to develop the CERP
- Due to the COVID-19 pandemic, regularly scheduled CSC meetings used a virtual platform to engage with the CSC and public
- The South Coast AQMD community liaison served as the point of contact
- The CSC Charter was developed by the community co-leads, with input from the CSC and South Coast AQMD
- Additional one-on-one, small group, and community meetings also played an important part in community engagement
- A community webpage was created as an information portal

Community engagement, outreach, and public process were crucial to developing the South Los Angeles (SLA) Community Emissions Reduction Plan (CERP). Key features of the outreach efforts include partnering with community co-leads, establishing a Community Steering Committee (CSC), hosting monthly CSC meetings and weekly community co-lead meetings, coordinating CSC member testimonials, and developing South Coast Air Quality Management District (South Coast AQMD) presentations. All materials were presented in English and Spanish via e-mail and webpage, and all CSC meetings were live-streamed (with English and Spanish interpretation). Also, numerous interactions between CSC members, community co-leads, and South Coast AQMD occurred in one-on-one and/or small group meetings, allowing for in-depth discussions on joint development and creation of this CERP.

South Coast Air Quality Management District Community Liaisons

A South Coast AQMD community liaison served as the point of contact to communicate with members of the CSC and members of the public to address concerns regarding logistics and development of both the CERP and Community Air Monitoring Plan (CAMP). The South Coast AQMD community liaison facilitated communications with the CSC and community members throughout the CERP development process and worked with them to identify the best ways to make information accessible and user-friendly. The South Coast AQMD community liaison for SLA is Bernard Tolliver (**btolliver@aqmd.gov**), formerly, the South Coast AQMD community liaison was Evangelina Barrera. Additionally, Nicole Silva (**nsilva@aqmd.gov**) serves as the South Coast AQMD point of contact for CERP-related discussions.

Figure 3-1: South Coast AQMD Assisting CSC Members and the Public via Zoom



Community Co-Leads

South Coast AQMD is partnered with three community organizations serving as community co-leads for the development and implementation of the Assembly Bill 617 (AB 617) Program in the SLA community. SLA is the first South Coast AQMD AB 617 community to use a community co-lead model. The three community co-leads have a contractual agreement with South Coast AQMD (**Figure 3-2**).

Figure 3-2: SLA Community Co-Lead Organizations

PSR-LA[1] is an organization that advocates for policies and practices that improve public health, the elimination of environmental and nuclear threats, and seeks to address health inequalities. PSR-LA has over a decade of experience working in the South Central Los Angeles (SCLA) community on toxics, air pollution and climate change, land use and community development, and oil and gas extraction. PSR-LA brings the strength and credibility of health professionals to local organizing efforts and regulatory action and advocacy.

SCOPE[2] brings over a decade of historical social justice work in SLA addressing issues of poverty, environmental racism, and chronic disinvestment using a bottom-up approach to creating systemic change. SCOPE's model of community organizing is anchored by community residents engaging their neighbors to build a unified voice and advance a community-led agenda. SCOPE builds grassroots power to create social and economic justice for low-income, women and women identifying, immigrant, black, and brown communities in Los Angeles. SCOPE organizes communities, develops leaders, collaborates through strategic alliances, builds capacity through training programs, and educates SLA's residents to have an active role in shaping policies that affect the quality of life in the region. Their core values are justice, respect, responsibility, integrity, and voice.

WCAEC[3] empowers the Watts community to achieve environmental justice by improving air quality and helping the community gain access to careers in the growing green energy industry. With daunting data on the rise in the era of competition between public utilities, the three founders knew that the disadvantaged Watts community was in need of active community education and engagement around the larger picture of global warming, including air and energy.

Community Steering Committee (CSC)

The main role of the CSC is to provide input and guidance as well as to propose community driven goals and actions for the community plans (i.e., CERP and CAMP). The CSC is composed of stakeholders with community knowledge to help drive community action and to develop the CERP and CAMP. The CSC creates a way to incorporate community expertise and direction in developing and implementing clean air programs in each community.

Formation of the Community Steering Committee

Beginning in March 2021, South Coast AQMD, in collaboration with the community co-leads, conducted outreach to gauge community interest in participating in the CSC. The community co-leads worked with the South Central LA Project to Understand the Sources and Health Impacts

[1] Physicians for Social Responsibility-Los Angeles, https://www.psr-la.org/
[2] Strategic Concepts in Organizing and Policy Education, https://scopela.org/
[3] Watts Clean Air and Energy Committee, http://wattscleanair.com/about/

of Local Air Pollution (SCLA-PUSH)[4] project to leverage their existing community relationships to establish the CSC. The CSC was finalized by May 2021.

The CSC has 46 primary members and two alternate members representing active residents, community organizations, and businesses. 26 are primary members who reside within the community (resident percentage on the CSC is 57 percent), three primary members and two alternate members represent agencies, schools/universities, and offices of elected officials who serve this community,[5] two primary members represent businesses or labor organizations, ten primary members represent community organizations, and five primary members are community co-leads.[6]

Community Steering Committee Charter

The community co-leads, in collaboration with South Coast AQMD, developed a CSC charter and a draft was presented to members at the first CSC meeting on April 1, 2021. CSC members were invited to comment and provide feedback before the charter was finalized at the July 22, 2021 CSC meeting. The CSC charter identifies committee objectives, roles and responsibilities, meeting frequency, meeting dates, times, and locations. The final charter is available in English[7] and Spanish.[8]

Community Meetings

California Air Resources Board (CARB) designated the SLA community for the AB 617 program in February 2021. South Coast AQMD, in collaboration with the community co-leads, hosted virtual community meetings on a regular basis. The community co-leads helped plan meeting agendas and discussion activities in order to facilitate meaningful engagements with the CSC. Virtual meetings were held due to the COVID-19 pandemic. Although there were some perceived disadvantages of virtual meetings, one advantage is that the virtual meeting format allows access to CSC meetings for community members who would otherwise not have been able to attend in-person meetings. This included a kick-off meeting, a series of CSC meetings, subcommittee meetings, and monitoring working team meetings. Subcommittee meetings focused on specific topics, such as Oil and Gas and Mobile Sources, where CSC members participated in breakout room discussions to provide input on potential CERP actions. Spanish interpretation is provided

[4] SCLA-PUSH Project, https://www.psr-la.org/wp-content/uploads/2020/09/SCLA-PUSH-Final-Report-2019-2020.pdf

[5] Per discussion with CARB, members representing agencies, schools, universities, hospitals, and offices of elected officials are not included in the calculation of resident percentage on the CSC.

[6] SLA AB 617, Community Co-leads Roster, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/roster.pdf

[7] SLA AB 617, CSC Charter in English, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/sla-charter.pdf?sfvrsn=8

[8] SLA AB 617, CSC Charter in Spanish, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/sla-charter-sp.pdf?sfvrsn=8

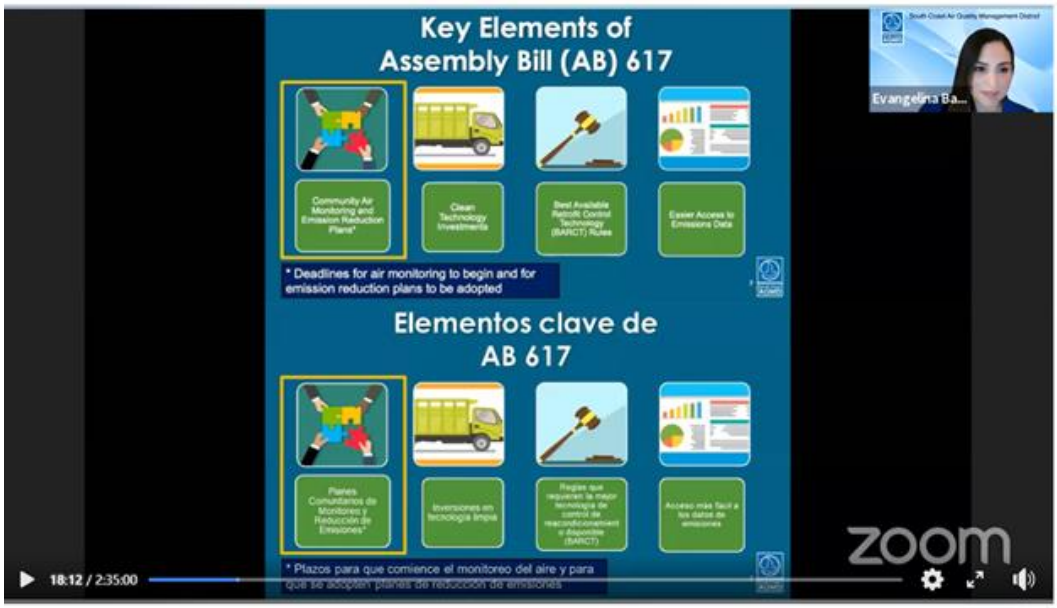
for all meetings, including teleconference capability for both English and Spanish lines. Meeting materials are also provided in both languages.

The SLA AB 617 work was unique compared to previous communities with which South Coast AQMD had worked. SLA was the first community where South Coast AQMD and community co-leads led CSC meetings together. An additional complexity to this community, was that all meetings were held virtually due to the COVID-19 pandemic. Connecting and creating relationships was more challenging since in-person meetings were not possible during the pandemic. It is important to recognize the dedication of all of the community co-leads, CSC members, and community representatives to continuously work and collaborate to develop the CERP and CAMP through the challenges of the pandemic.

First Community Meeting (Community Kick-Off Meeting)

The first community meeting for the SLA community was held virtually on January 14, 2021 (**Figure 3-3**) with approximately 90 people in attendance. During this meeting, South Coast AQMD provided an overview of the agency, South Coast AQMD and CARB presented information about the AB 617 program and explained the critical role of the CSC in the development and implementation of the CERP and CAMP.

Figure 3-3 : First Community Meeting



AB 617 Virtual Community Kickoff Meeting (South Los Angeles, 1/14/21)

What's Up With the Air in South LA? An AB 617 Air Quality Virtual Conference[9]

On February 16, 2021, PSR-LA in collaboration with SCOPE and WCAEC, South Coast AQMD, and CARB hosted a conference called "What's Up With the Air in South LA? An AB 617 Air Quality

[9] PSR-LA, "What's Up With the Air in South LA? An AB617 Air Quality Conference", https://www.youtube.com/watch?v=UpSAvGSqpSY

Virtual Conference". The conference discussed the community history and cumulative burden, including environmental justice policies, introduced SCLA-PUSH and their work, and community members provided testimonials. Additionally, CARB presented an overview of the AB 617 program and South Coast AQMD discussed its role in the AB 617 program, and options for the CSC structure. The conference ended with panel discussions.

Community Steering Committee Meetings

Appendix 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process contains details on CSC meetings, including meeting dates and meeting documents and materials.

Monitoring Working Team Meetings

In order to leverage the knowledge and experience of community members most effectively, a Monitoring Working Team (MWT) was created to inform and direct the CAMP and provide guidance throughout its implementation. MWT meetings are a dedicated forum for in depth discussions on air monitoring topics, and the information from MWT meetings are presented and discussed with the CSC to provide updates on CAMP activities. Information regarding the MWT and MWT meetings can be found in the CAMP.

Community Engagement and Input Process

Collaboration Process

The elements and actions described in this CERP were developed during monthly CSC meetings, subcommittee meetings, and workshops. During these meetings, community co-leads, CSC members, members of the public, CARB, and South Coast AQMD worked together to discuss the various air quality concerns within the community boundary and identified opportunities to address them. This was an iterative process and details for this CERP (e.g., community boundary, air quality priorities, goals, and actions, formation of subcommittees and a working team) were adjusted according to discussions at meetings.

Community Engagement Tools

During community meetings, to interact with the CSC and offset perceived disadvantages of virtual meetings, South Coast AQMD and community co-leads interacted with the CSC using new and engaging tools such as file sharing services and Google Suite web-based applications including Google Jamboard and Google Forms.

Additionally, to increase community engagement, South Coast AQMD and community co-leads used the following tools:

- Language justice,
- Interpretation services,
- Inclusive engagement and participation, and

- Breakout sessions during CSC meetings.

Committee Presenters

A critical aspect of the CERP is development and implementation through collaboration with community co-leads, CSC members and the agencies, organizations, businesses, or other entities that they may represent. During CSC meetings, community co-leads engaged the CSC members by requesting them to present testimonials to describe their efforts in the community or experiences regarding a particular air quality priority. For example, CSC members were invited to share their work that is complementary to the actions being developed in the CERP, such as programs carried out by their organization that help address air quality issues in the community.

Meeting Facilitator

The community co-leads worked in collaboration with South Coast AQMD to select a professional facilitator to support CSC meeting and to promote equity with the South Coast AQMD and the community. The facilitators' role is to moderate the conversation during meetings, keep the agenda on-track, build consensus, ensure everyone has the opportunity to participate, and maintain a positive meeting environment among all participants.

CSC meetings and meetings with the community co-leads are facilitated by La Mikia Castillo and Diana Sarabia-Briseño of Castillo Consulting Partners (CCP). CCP is a community-based consulting firm that is dedicated to empowering diverse leaders to use their voices for systemic change. CPP has a contractual agreement with South Coast AQMD and is compensated for their facilitator services at CSC meetings and meetings with the community co-leads.

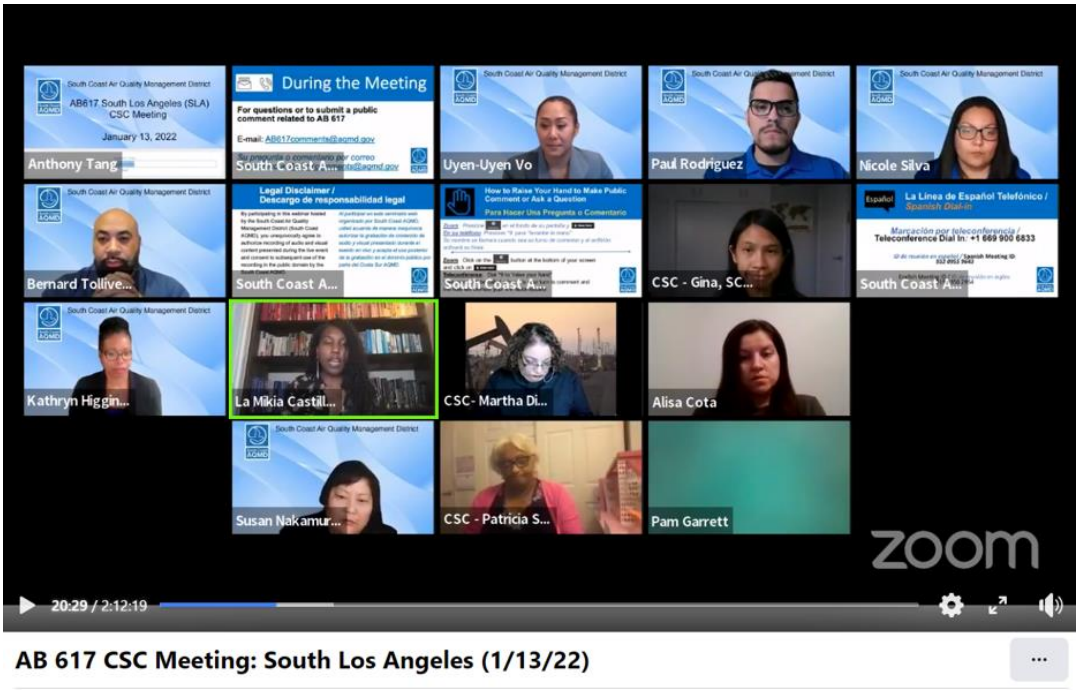
CCP attended and facilitated monthly CSC meetings and supported weekly community co-lead meetings. CCP took a community driven approach to enhance ongoing participation and diverse perspectives from CSC members to develop the CERP for SLA. CCP prioritizes facilitating dialogue and shared decision-making between CSC members and South Coast AQMD as the group moves through the development process with the approach to ensure accountability of South Coast AQMD and community partners.

Additional Community Engagement

To further engage the community members throughout CERP development, South Coast AQMD participated in one-on-one or small group meetings with members, and attended meetings led by various community organizations. These meetings provide committee members an opportunity to communicate directly with South Coast AQMD and for South Coast AQMD to answer questions and clarify information requested from CSC members. South Coast AQMD was able to gain a better understanding of the unique issues faced by each community by attending and participating in meetings led by community organizations.

Broader public engagement is important to the AB 617 program. South Coast AQMD reviews comments after each CSC meeting and responds as needed (**Figure 3-4**).

Figure 3-4: Community Members are Invited to Share Community Information on Air Pollution Concerns



Throughout the development of the CERP, South Coast AQMD met with community members, environmental justice and local organizations, industry, city and county governments, and other stakeholders to provide assistance and prompt response to concerns raised about the CSC process and to promote participation in the development and implementation of the CERP. South Coast AQMD attended meetings hosted by other entities in this community to give presentations on AB 617 CERP development and had more than 35 phone and virtual meetings with committee members to discuss the CSC process and seek input on CERP actions. South Coast AQMD will continue to work with the community co-leads and CSC to implement the CERP actions, provide periodic community updates, and adjust the outreach approaches to be more effective. Community engagement is essential to the success of the CERP and the AB 617 program as a whole, and all parties are committed to building and improving upon existing outreach efforts.

Community co-leads engaged in additional community outreach activities to ensure community members were informed of the AB 617 process. PSR-LA through the SCLA-PUSH project hosted several trainings, informational webinars, and conducted periodic phone banking and outreach to ensure community members and CSC members were equipped with tools to actively participate in CSC meetings. Additionally, PSR-LA leveraged their existing relationships with community-based organizations to keep community members informed.

WCAEC, through the SCLA-PUSH project, presented educational and interactive engagements to a wide cross section of stakeholders (e.g., residents; community groups; clergy and

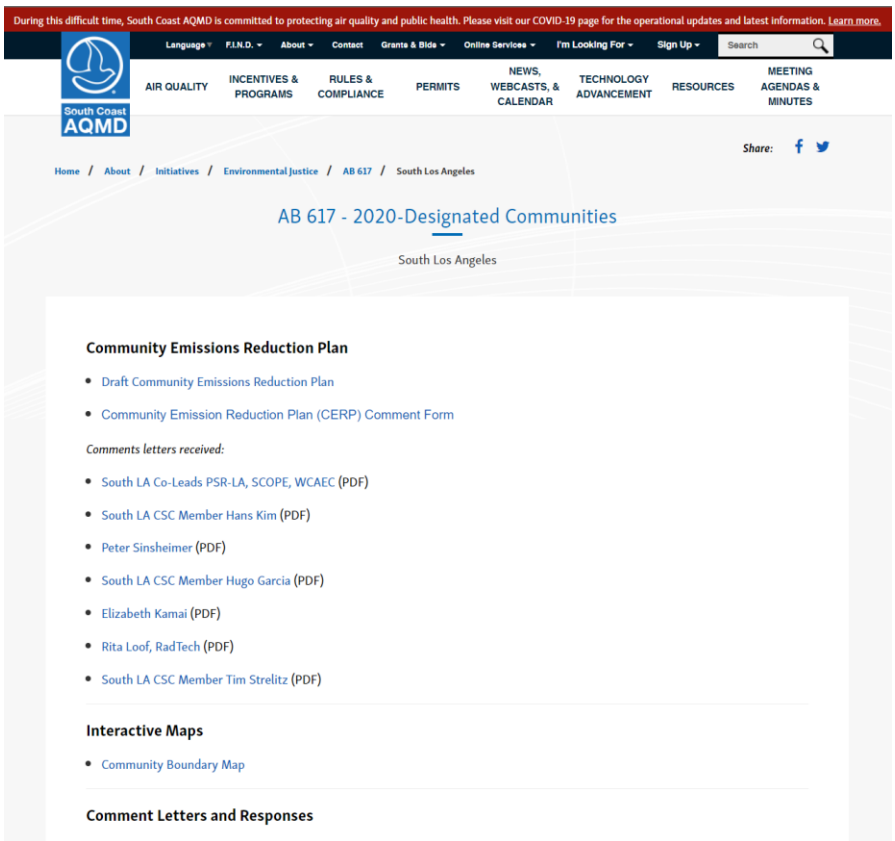
congregations; city, county, state, and federal agencies; schools). Additionally, WCAEC used multifaceted communications to facilitate awareness, support, and to survey for input.

Public Information Portals

Community Webpage

A community webpage (**Figure 3-5**) was created for the SLA community. The webpage includes information about upcoming meetings, meeting materials (flyers, agendas, presentations, handouts, live stream links, and meeting summaries). Additionally, the SLA community page includes an interactive map, the CSC roster, and the CERP and CAMP documents. All flyers, agendas, social media posts, presentations, and handouts to the CSC were made available in English and Spanish.[10]

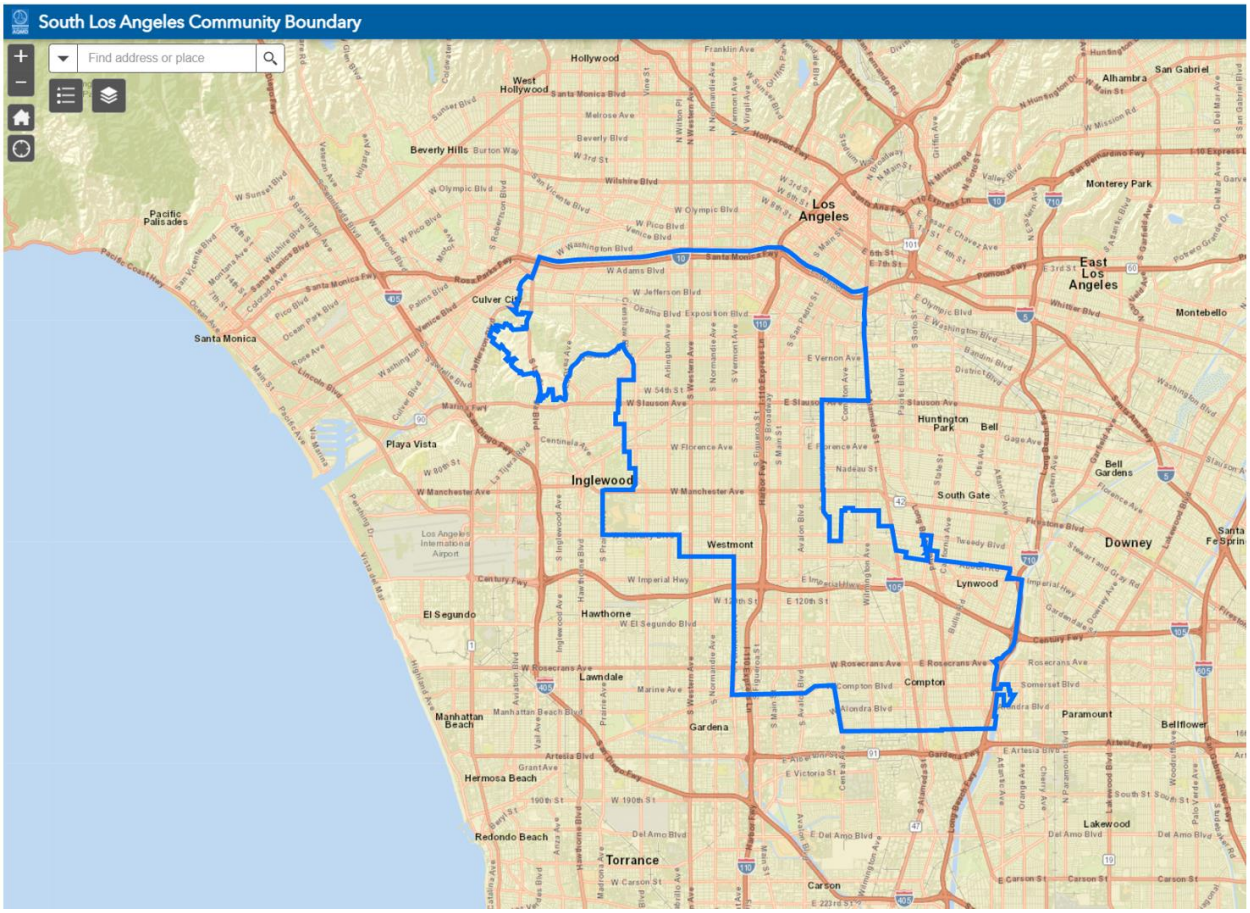
Figure 3-5: Community Webpage for the SLA Community



[10] South Coast AQMD, AB 617 – 2020-Designated Communities, SLA, http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la

The interactive map on the webpage presents data about the community (**Figure 3-6**). These interactive maps provide data on land use, locations of facilities, schools, hospitals, daycare centers, and the air quality concerns identified by the CSC and members of the public. This information was provided to help inform air quality priorities for the CERP for SLA.

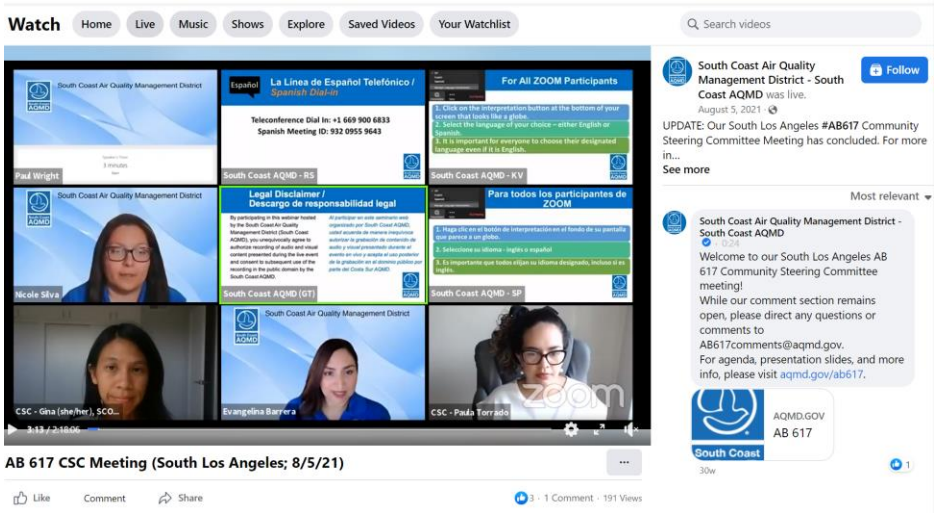
Figure 3-6: Map Showing the SLA Community Boundary



Social Media

All CSC meetings were live-streamed using Facebook Live (**Figure 3-7**). The links to the live-stream recording were also posted on the South Coast AQMD community webpage[10] so that members who could not attend or view the meeting live could view the recorded video. All CSC meetings are publicized on Instagram, Twitter, and Facebook, and are available in English and Spanish.

Figure 3-7: Screenshot of Facebook Live Recording of an SLA CSC Meeting



Chapter 4

Enforcement Overview and History

Introduction

This chapter describes the enforcement history and overall approach to enforcement by South Coast Air Quality Management District (South Coast AQMD) and California Air Resources Board (CARB). In addition, the Community Emissions Reduction Plan (CERP) includes focused enforcement actions, which are described in Chapter 5: Actions to Reduce Community Air Pollution. Both CARB and South Coast AQMD regulate and enforce air pollution rules and regulations, permit conditions, and the Health and Safety Code. Each have the authority to conduct inspections of air pollution sources and issue violations that can lead to penalties, as well as the ability to make referrals to state prosecutorial agencies for criminal prosecution.[2]

Chapter 4 Highlights

- From 2018 through 2021,[1] in the South Los Angeles (SLA) area, CARB conducted over 300 inspections and addressed approximately 60 public complaints; and South Coast AQMD conducted approximately 765 inspections and responded to approximately 3,034 public complaints.
  - South Coast AQMD inspections resulted in 204 Notices of Violation (NOVs) and 312 Notices to Comply (NCs).
- The enforcement approach for SLA utilizes specialized program structures, outreach efforts in the community, use of technology, and interagency partnerships which can lead to increased compliance and further emission reductions.

An air pollution source can be a specific piece of equipment or a process, a business, a government agency, or any other entity that creates air pollution. As summarized in **Table 4-1**, CARB is primarily responsible for mobile sources, while South Coast AQMD is primarily responsible for enforcement relating to stationary sources (e.g., facilities).[3] Both agencies regulate and enforce stationary sources with toxic air contaminants (TACs) through relevant regulations. Part of CARB's Air Toxics Program are its Airborne Toxic Control Measures (ATCMs)[4] which are emission control programs for mobile and stationary sources to reduce air emissions.

[1] For the purpose of this chapter, the timeframe of "2018 through 2021" includes January 1, 2018, through December 31, 2021.

[2] Please refer to Appendix 4: Enforcement Overview and History for additional information regarding penalties.

[3] In some cases, CARB may have agreements that give local air districts delegated authority to enforce a particular CARB rule. For example, South Coast AQMD has an agreement with CARB to be able to enforce CARB's greenhouse gas standards.

[4] CARB, Airborne Toxic Control Measures, https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures

Table 4-1: Sources Enforced by CARB and South Coast AQMD

Air Pollution Source Category	Examples	Main Regulatory Agency
Mobile Sources[5]	Trucks, buses, ships, boats, cargo handling equipment, construction equipment	CARB
Stationary Sources[6]	Refineries, power plants, oil and gas facilities, manufacturing plants	South Coast AQMD
Areawide Sources[7]	Paint and coatings used on buildings	CARB and South Coast AQMD
Indirect Sources[8]	Ports, railyards, warehouses	South Coast AQMD
Sources of Greenhouse Gases[9]	Methane emissions from facilities	CARB and South Coast AQMD

Enforcement Overview

The primary goal of enforcement activities is to ensure that regulated entities are complying with permit conditions and rules and regulations. With the exception of administrative rules, South Coast AQMD rules and regulations are designed to improve air quality and protect public health through the establishment of emission standards, monitoring, reporting and recordkeeping, and prohibitions. Verifying compliance with South Coast AQMD's regulatory program ensures implementation of rules and regulations are achieving their air quality goals and levels the playing

[5] Mobile sources are moving sources of air pollution such as automobiles, motorcycles, trucks, and off-road vehicles.
[6] Stationary sources are divided into two major subcategories: point and area sources. Point sources consist of a single emission source with an identified location point at a facility. Area sources are small emission sources that are widely distributed but may have substantial cumulative emissions.
[7] Areawide sources are smaller sources of pollution, including permitted sources smaller than the South Coast AQMD emission reporting threshold and those that do not receive permits (e.g., water heaters, gas furnace, fireplaces, woodstoves, architectural coatings) that often are typically associated with homes and non-industrial sources.
[8] Indirect sources are any facility, building, structure, or installation, or combination thereof, which generates or attracts mobile source activity that results in emissions of any pollutant (or precursor) for which there is a state ambient air quality standard. Examples of indirect sources include employment sites, shopping centers, sports facilities, housing developments, airports, commercial and industrial development, and parking lots and garages.
[9] Greenhouse gases are gases including carbon dioxide, methane, and nitrogen oxides that have a high potential for trapping heat in the Earth's atmosphere.

field for all regulated entities- preventing unfair advantages for companies that do not comply with rules and regulations, including permitting equipment that is required to be permitted.

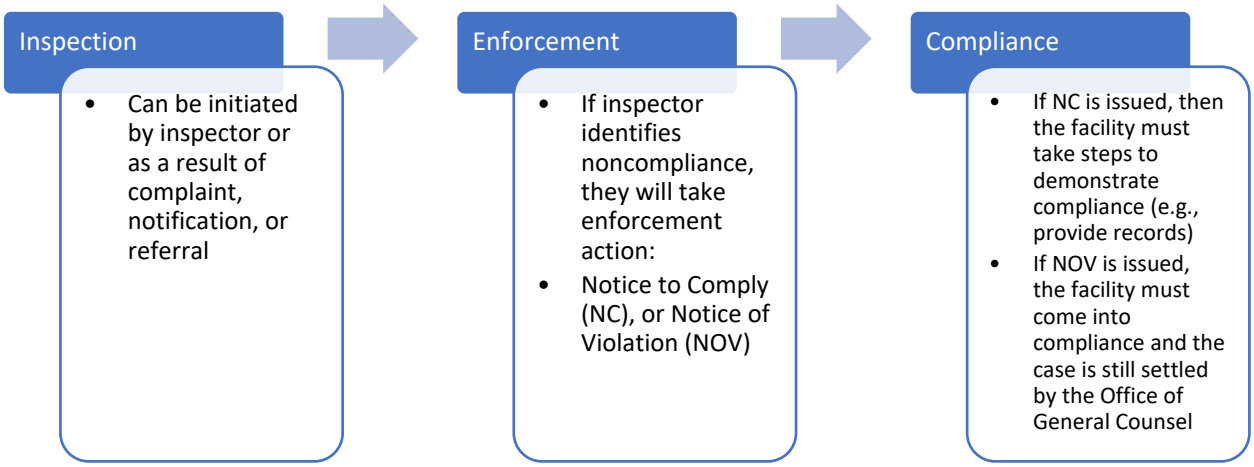
South Coast AQMD's enforcement activities largely fall into two categories:

- Activities initiated by South Coast AQMD, such as routine facility inspections or targeted rule inspections.
- Activities where the public or an entity contacts the South Coast AQMD and an inspector responds such as, complaint investigations, facility notifications, or agency referrals.

Inspections are generally unannounced to ensure that the inspector can observe normal operations at a facility. Inspections can be conducted to evaluate the overall compliance status of the facility (looking at everything onsite) or focus on specific aspects of an operation to ensure the facility is following a specific rule or regulation (looking at a specific part of the process). Further, when it comes to response for complaints, notifications, or agency referrals, the extent of an investigation can vary significantly based on factors such as if the issue is on-going, if a source was identified, if the facility falls within the jurisdiction of the South Coast AQMD, or if the facility is violating any applicable rules.

Enforcement mechanisms are designed to promote and, if necessary, compel compliance by regulated sources. The general process for an inspection is as follows (**Figure 4-1**):

Figure 4-1: Inspection Process



There are two methods of enforcement action:

1. A Notice to Comply (NC) may be issued for minor violations found during an inspection or to request additional information.
2. A Notice of Violation (NOV) may be issued for noncompliance with rules, permit conditions, or administrative requirements. NOVs generally result in a fine or other penalty.

If no settlement is reached, a civil lawsuit can ultimately be filed in superior court. Ongoing noncompliance, however, may lead to a petition for an Order of Abatement before the South Coast AQMD Hearing Board, which would have the authority to require a facility to take specific actions to achieve compliance.

Within the SLA boundary, there are 766 facilities with active South Coast AQMD permits. Both CARB and South Coast AQMD have a presence in this community, which has led to various enforcement actions against facilities within the SLA boundary.[10] **Table 4-2** describes South Coast AQMD's enforcement activities at facilities associated with a CSC-identified air quality priorities.

Table 4-2: South Coast AQMD Summary of Enforcement Activities by Community Concern from 2018 to 2021[1]

Air Quality Priority	Number of Facilities	Number of Inspections[11]	Number of Complaints[12, 13]	Number of NOVs	Number of NCs
Oil and Gas	19	41	80	13	11
Mobile Sources (Truck Idling)	N/A	0	17	0	0
General Industrial[14]	353	413	50	153	168
Auto Body Shops	89	57	8	12	68
Metal Processing	69	197	3	26	65

Inspections are conducted as part of an inspector's regular assignments; however, there is not a specific number of inspections in which inspectors are required to conduct for a facility. Inspections are prioritized based on a variety of factors, such as proximity to schools and other sensitive receptors, pollutants generated, and facility size. Inspectors must also prioritize complaints and respond accordingly to each one. If enforcement activities identify noncompliance, the inspector will issue an NC and/or NOV. Note that not all complaints will lead to enforcement actions, but may assist inspectors in their compliance investigations.

For mobile sources, South Coast AQMD enforces CARB's truck idling rule, and the focus of South Coast AQMD's efforts within SLA has been to respond to idling complaints. While South Coast

[10] Please refer to Appendix 4 for additional details on South Coast AQMD and CARB enforcement actions.
[11] These include South Coast AQMD-initiated inspections and surveillances, but not responses to facility notifications or complaints.
[12] Complaints where the source (e.g., facility) was confirmed to be a community concern.
[13] Multiple complaints received can correspond to one single event from one source (e.g. facility).
[14] Includes inspections at Chemical, Dry Cleaners, Gas Stations, Manufacturing, Other Industrial, and Utility facilities.

AQMD has not received a significant number of idling truck complaints in SLA, there were 17 complaints received between 2018 to 2021.[1] While compliance with the idling rule tends to be high, South Coast AQMD AB 617 Community Steering Committees (CSCs) consistently identify idling trucks as a source of air pollution concerns within their community.

Therefore, South Coast AQMD is committed to increasing enforcement efforts on idling trucks within these communities. While South Coast AQMD will identify locations where idling enforcement efforts should be focused, input from the CSC is invaluable to this process. Locations and other information can be provided during CSC meetings, during truck idling activities, and by submitting complaints (1-800-CUT-SMOG or online[15]). South Coast AQMD will also conduct community outreach on these rules, and if feasible, CSC members are encouraged to be community liaisons to support both South Coast AQMD and CARB with community outreach about CARB's idling rules.

Public Complaints

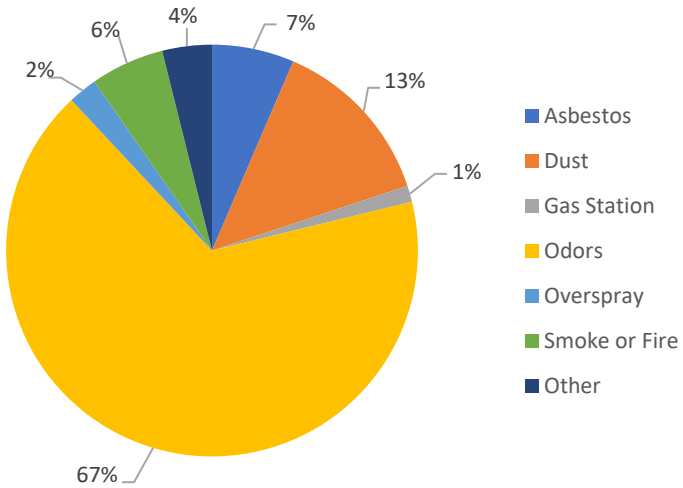
Air pollution concerns received directly from community members by way of public complaints are a very important source of information for South Coast AQMD. All public complaints are assigned to an inspector for investigation, with priority for ongoing issues that are impacting the public, and response to public complaints can start with a follow-up phone call and may lead to in-person investigations. **Table 4-3** provides a summary of public complaints received within SLA and the nearby community. "No Enforcement Action Taken" means that the complaint investigation concluded and did not result in the issuance of an NOV, NC, or other formal enforcement action. For example, an alleged air pollution source may have been operating in compliance at the time of the inspection or the event underlying the complaint was no longer occurring.

[15] South Coast AQMD, Complaint Reporting System, http://www3.aqmd.gov/webappl/complaintsystemonline/NewComplaint.aspx

Table 4-3: Summary of Public Complaints Received in SLA and the Nearby Communities[16] from 2018 to 2021[1]

Complaint Type	Public Complaints[13]	NOVs Issued	NCs Issued	Referred to Another Agency	No Enforcement Actions Taken
Asbestos	229	7	49	4	169
Dust	477	28	32	5	412
Gas Station	45	0	2	7	36
Odors	2,369	284	27	12	2,046
Overspray	81	1	6	4	70
Smoke or Fire	205	15	4	1	185
Other	138	9	6	7	116
Total	**3,544**	**344**	**126**	**40**	**3,034**

Figure 4-2: Breakdown of SLA Complaints Received 2018 to 2021[1]



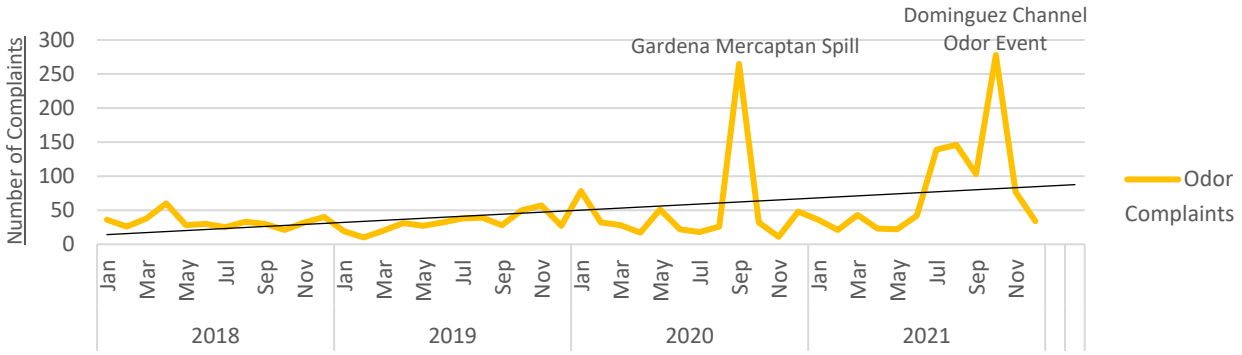
The most common type of public complaints, as **Figure 4-2** indicates, are odor complaints. Due to the fleeting nature of odors, inspectors may not always be able to verify an odor or detect a source; and while this can be a frustration for community members, South Coast AQMD urges members of the community to call in a public complaint on each occurrence. This strengthens the investigation and increases the likelihood that a source will ultimately be identified because

[16] The complaint information is based on the following Zip Codes: 90003, 90037, 90059, 90061, 90062, 90222, 90011, 90262, 90007, 90008, 90018, 90089, 90044, 90016, 90305, 90047, 90221, 90002, 90043, 90220, 90015, 90001, 90248, 90056, 90021, 90303, 90247, 90230, and 90058.

inspectors' investigations lead them to the site more often which increases the potential of taking enforcement action if violations are found.

Odor complaints have trended upwards over the years, potentially due to increased outreach efforts by South Coast AQMD and increased awareness by community members. However, as **Figure 4-3** indicates, complaint totals can be impacted by large odor events such as the spill of mercaptan (an odorant used for natural gas) that took place in Gardena in September 2020[17] and the Dominguez Channel Odor Event in October 2021.[18] Such events can result in large numbers of public complaints, and inspectors focus more time towards investigations of them.

Figure 4-3: Odor Complaints by Month in SLA



An important part of AB 617 is to increase community awareness of the tools that are available to them. Reporting public complaints to both South Coast AQMD and CARB enables members of the public to play an active role in addressing air pollution concerns in their community. Both agencies rely on community input for identifying additional locations and sources of concern. Listed below are the best ways to report public complaints with South Coast AQMD[19] and CARB:[20]

[17] South Coast AQMD, Press Release, September 11, 2020, https://www.aqmd.gov/docs/default-source/news-archive/2020/NOVs-for-chemical-spill-compton-sept11-2020.pdf

[18] South Coast AQMD, Press Release, December 3, 2021, http://www.aqmd.gov/docs/default-source/news-archive/2021/5novs-for-elevated-hydrogen-sulfide-levels-dec3-2021.pdf

[19] South Coast AQMD, Complaint Reporting System, http://www3.aqmd.gov/webappl/complaintsystemonline/NewComplaint.aspx

[20] CARB, Tips & Complaints, https://ww2.arb.ca.gov/our-work/programs/environmental-complaints/tips-complaints

CARB

Online:

About the Environmental Complaint System

By Phone:

1(800)-END-SMOG

(1-800-363-7664)

South Coast AQMD

Online:

File an Online Complaint

By Phone:

1(800)-CUT-SMOG

(1-800-288-7664)

When reporting air pollution complaints, it helps when you can share the Four W's:

What	Where	When	Who
• What are you reporting? • Odor, smoke, burning, idling truck?	• Where did it occur? • As specific of a location as possible	• When did it occur? • Date/time, and is it ongoing?	• Who caused it, if you know?

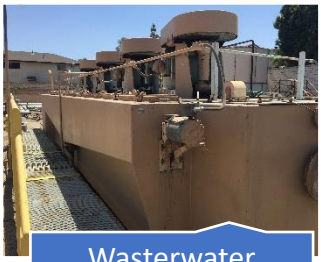
Typically, videos and photos cannot be the basis for South Coast AQMD and CARB to take enforcement action, but they can be helpful to the investigation. Of course, please always make sure that you are being safe.

Oil and Gas Industry

Oil and gas facilities extract crude oil from underground and may also store the oil on-site. These facilities generally have permits for oil extraction, storage tanks, and wastewater equipment (**Figure 4-4**) and **Figure 4-5** shows a map of oil and gas facilities with active South Coast AQMD permits in SLA.

*The majority of the NOVs referred to in **Table 4-2** at oil and gas facilities were issued for violations of the VOC emissions standards set forth in Rule 1173.*

Figure 4-4: Examples of Equipment at Oil and Gas Facilities

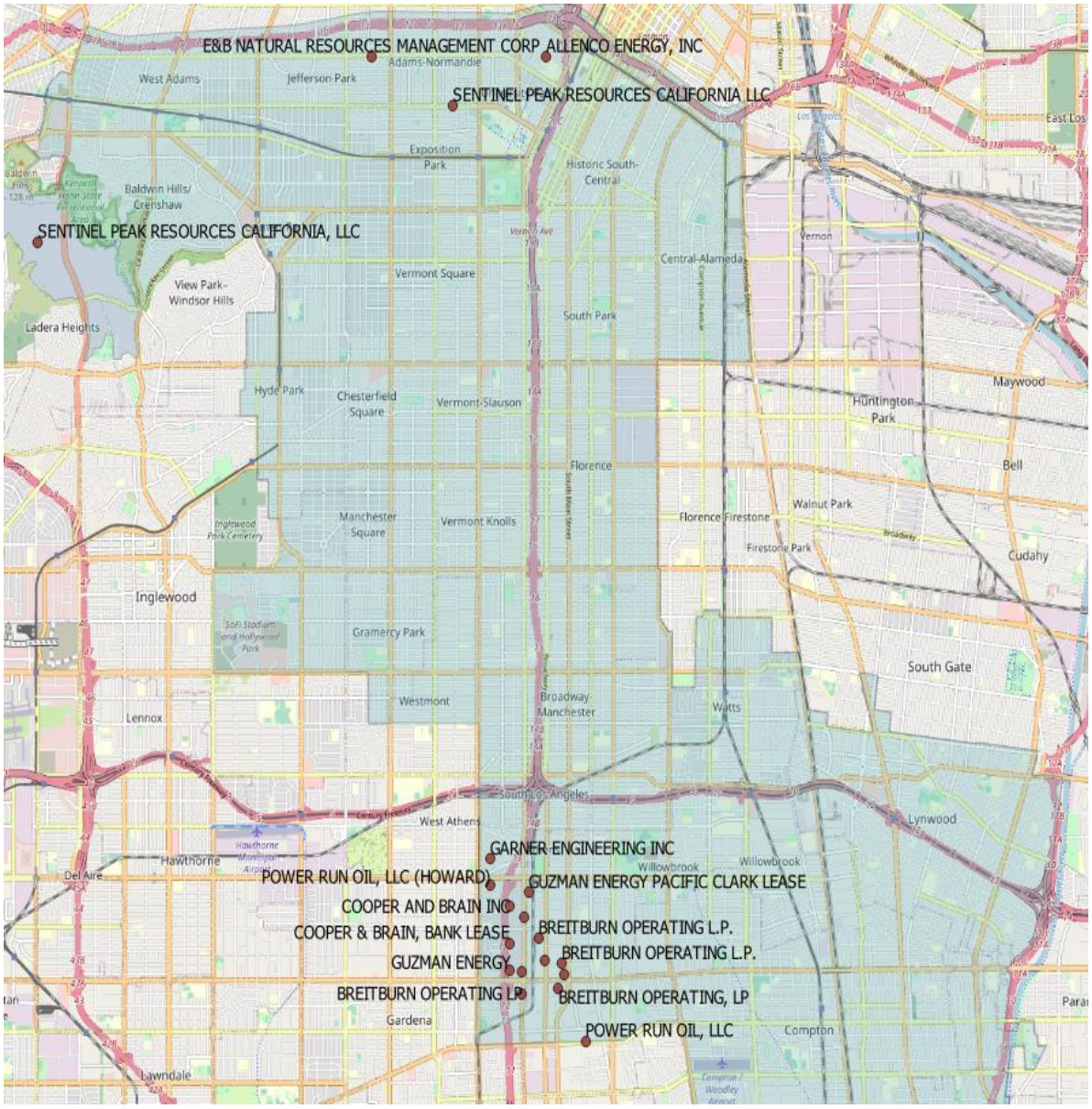


Wasterwater Separator

Storage Tank

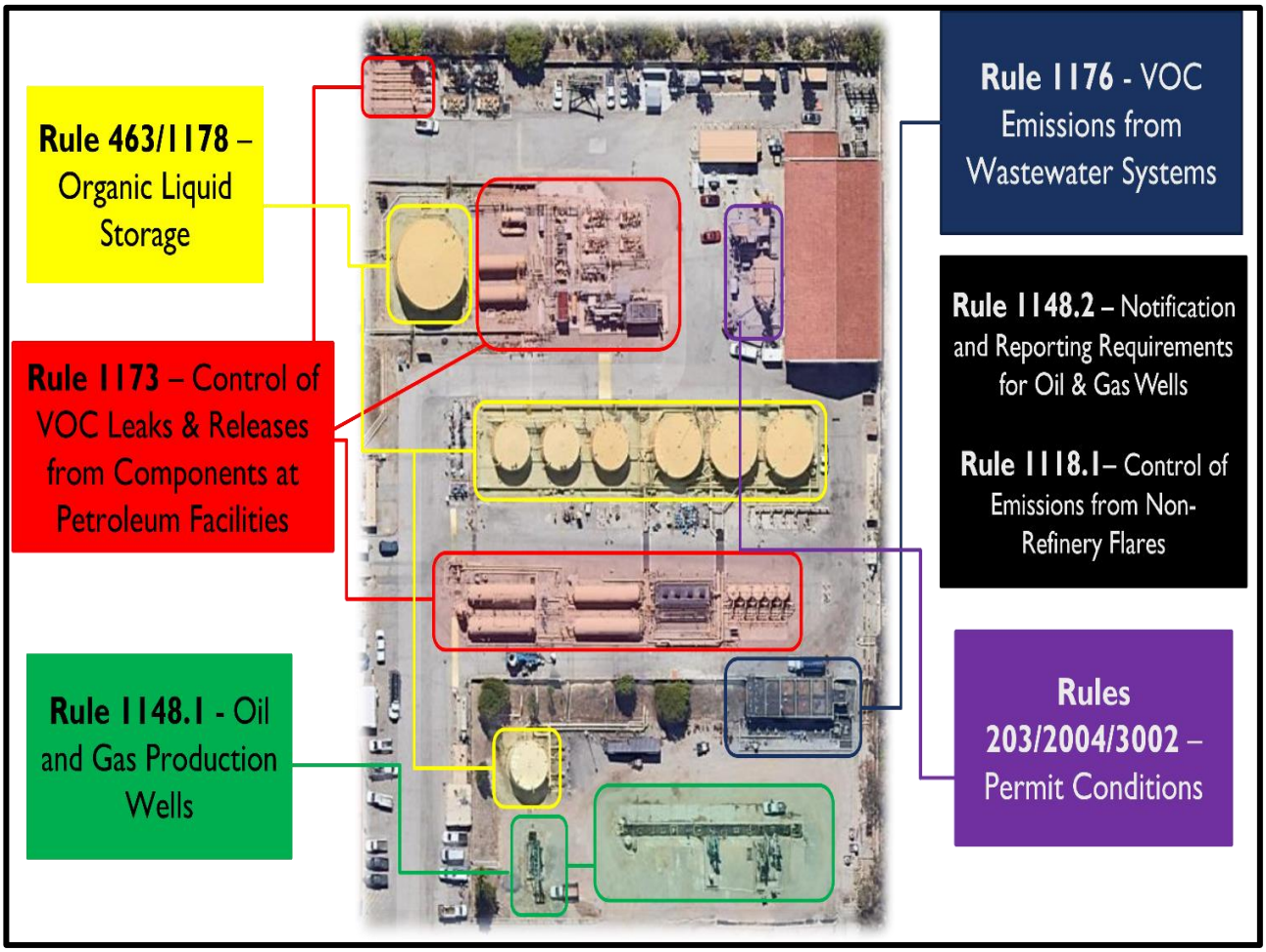
Oil Extraction Well

Figure 4-5: Map of Oil and Gas Facilities with Active South Coast AQMD Permits



Oil wells are inspected by South Coast AQMD's Energy Team. The Energy Team enforces the applicable regulations (**Figure 4-6**) using specialized equipment such as Optical Gas Imaging cameras, Toxic Vapor Analyzers, and other air sampling equipment. Inspections of these sites focus on identifying fugitive volatile organic compound (VOC) emissions, and when detected inspectors take enforcement action, if appropriate (**Table 4-2**). While the majority of South Coast AQMD's authority at these facilities is focused on criteria pollutants and toxics, the agency also actively enforces CARB's methane regulations.

Figure 4-6: Rules Applicable to Oil and Gas Sites



General Industrial

General Industrial is a broad category which covers community concerns that do not fit neatly into other categories identified by the CSC. General industrial facilities have permitted equipment based on the particular process(es) at issue, such as storage tanks, baghouses, boilers, and heaters (**Figure 4-7**). Manufacturing is the largest category within this group. **Figure 4-8**, **Figure 4-9**, and **Figure 4-10** provide an overview of facilities within this air quality priority.

Figure 4-7: Examples of General Industrial Facility Equipment

Generally, inspections of these facilities would be conducted by South Coast AQMD's Industrial, Commercial, and Government Operations Team; however, specialized teams may conduct inspections for certain sources, such as gas stations.

Figure 4-8: Breakdown of Number of General Industrial Facilities in SLA

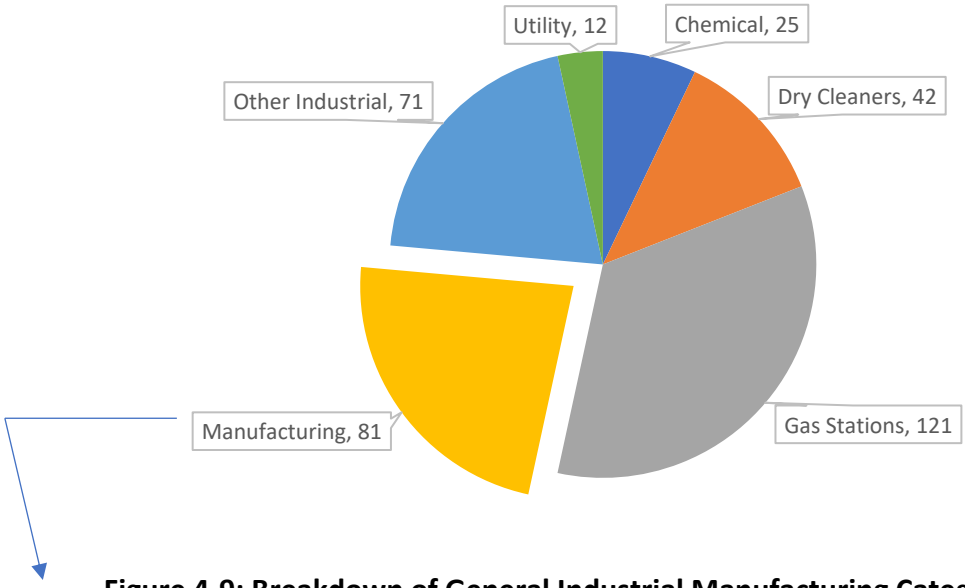


Figure 4-9: Breakdown of General Industrial Manufacturing Category in SLA

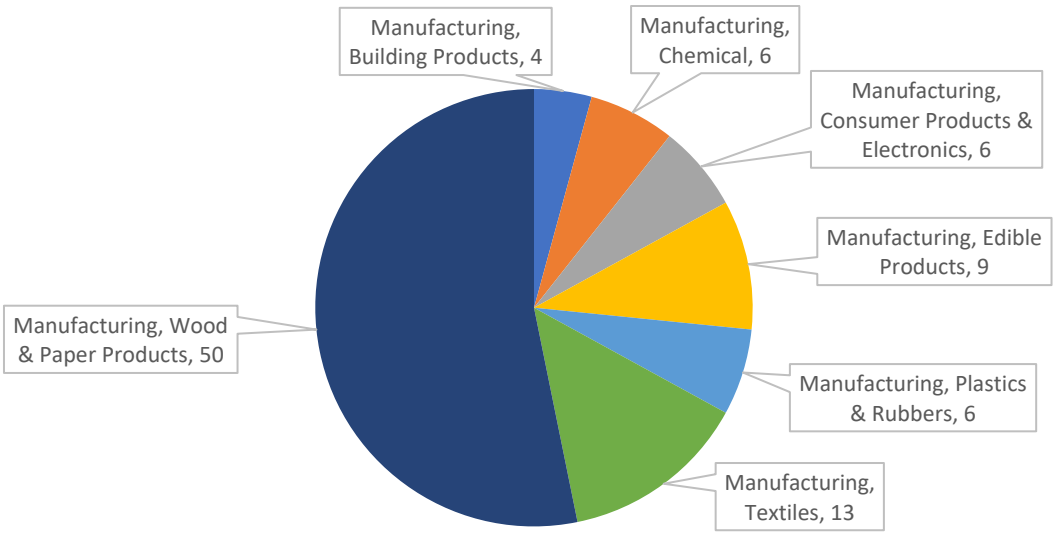
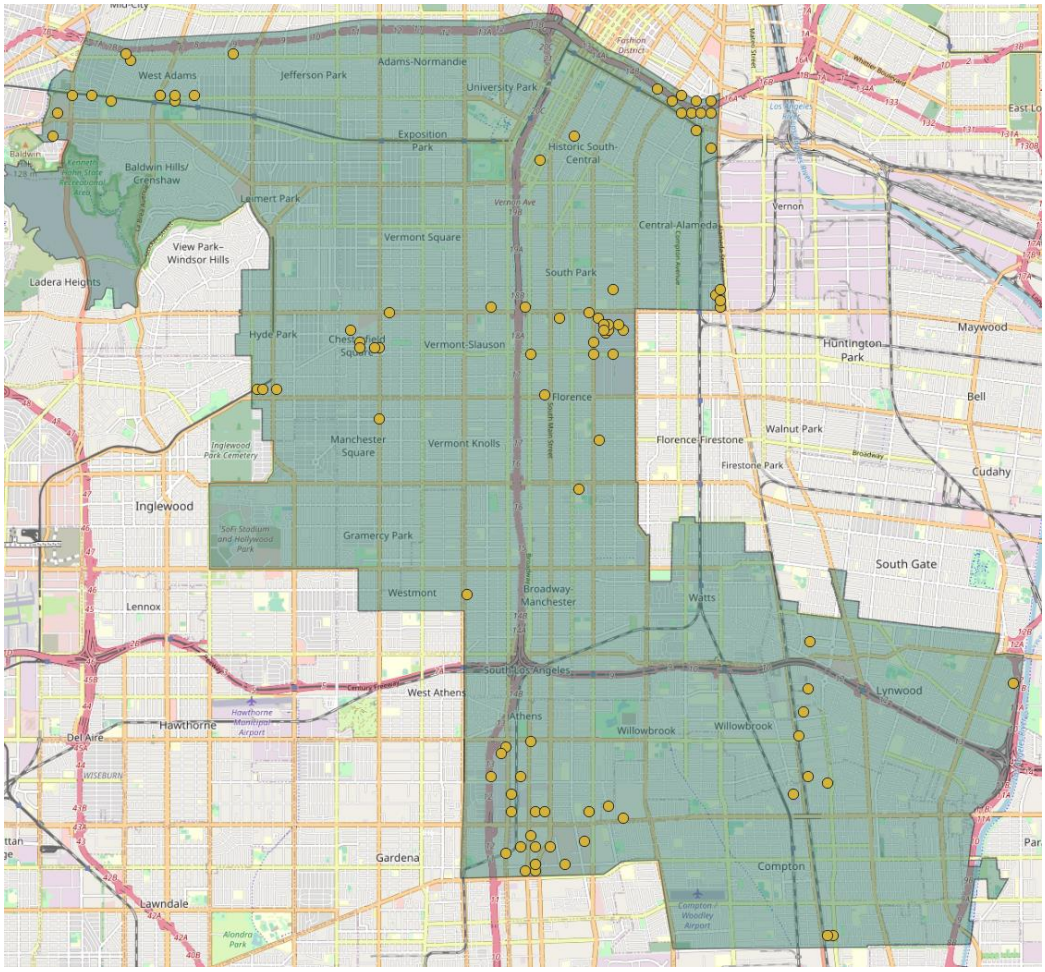


Figure 4-10: Map of General Industrial Manufacturing Category in SLA



Since this category can contain a variety of facility types, CSC input provided on this topic will be crucial in prioritizing South Coast AQMD inspections. The numbers and rules cited for NOVs within this category vary widely and may not be indicative that a particular industry is "better" or "worse" than another, since the rules and permit conditions that apply may be different. Therefore, the CSC input on this topic will give community level insight to focus enforcement efforts within this category.

Metal Processing

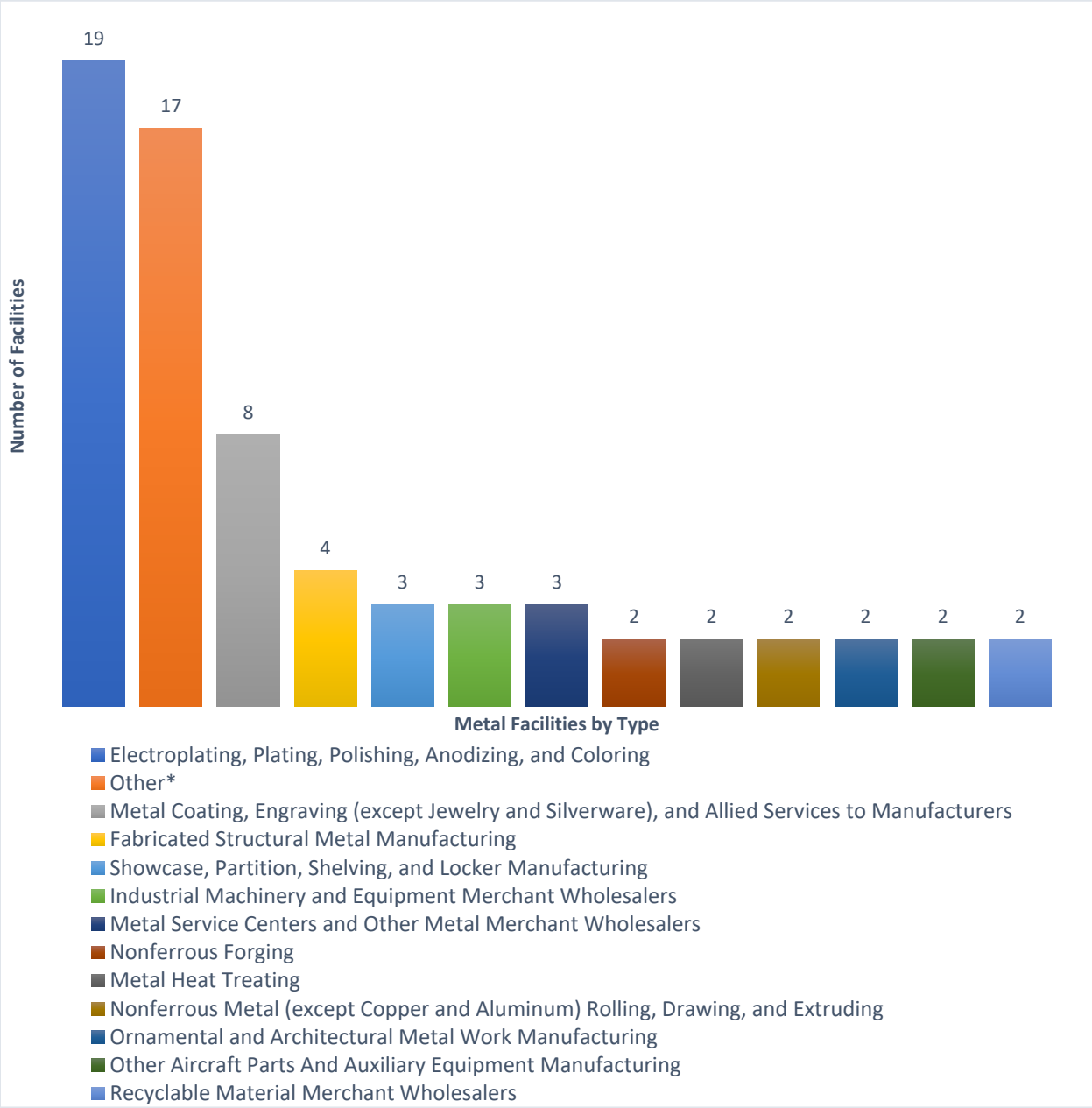
Figure 4-11: Pouring Molten Metal into Molds

Metal facilities are those which work with or process metals. They can have permits for plating, coating, melting, or other metal working processes (**Figure 4-11**). These facilities are mainly inspected by two South Coast AQMD teams, depending on the source type: Industrial, Commercial, and Government Operations and Toxics and Waste Management.

Figure 4-12 provides the current distribution of metal processing facility types within the community. The figure highlights the most common types of metal facilities in order to help inform the CSC on the sources within their community and enable the CSC to prioritize efforts towards those sources, which are of greatest concern to them and to other members of the community. Please refer to Appendix 4: Enforcement Overview and History for the full list of facilities and their categories.

When considering priorities, it is important to consider that South Coast AQMD prioritizes inspections using various criteria, including the type of pollutants potentially emitted by a facility. For example, chrome plating facilities are generally inspected once per quarter, due to the higher risk that emissions of hexavalent chromium can pose.

Figure 4-12: Distribution of Metals Facility Types in SLA[21]*01*



*The "Other" category includes single-facility categories, including: All Other Fabricated Metal Product Manufacturing, Cutting Tool And Machine Tool Accessory Manufacturing, Fluid Power Valve And Hose Fitting Manufacturing, Machine Shops, Machine Tool Manufacturing, Materials Recovery Facilities, Metal Household Furniture Manufacturing, Motor Vehicle Parts Manufacturing, Other Fabricated Wire Product Manufacturing, Other Industrial Machinery Manufacturing, Other Metal Valve And Pipe Fitting Manufacturing, Other Nonferrous Metal Foundries (Except Die-Casting), Plate Work Manufacturing, Powder Metallurgy Part Manufacturing, Power-Driven Handtool Manufacturing, Secondary Smelting And Alloying Of Aluminum, And Steel Foundries (Except Investment).

[21] A full breakdown of other categories not listed in this figure will be provided in Appendix 4.

Auto Body Shops

Auto body shops are facilities that conduct automotive repair and refinishing (**Figure 4-13**). These facilities are inspected by South Coast AQMD's Industrial, Commercial, and Governmental Operations team, which oversees many types of industrial facilities within an assigned region. Auto body shop inspections are conducted as part of an inspector's regular assignments, however there is not a specific number of inspections for these facilities which inspectors are supposed to conduct. This is because inspectors must focus their efforts on a variety of sources.

Figure 4-13: Application of Automotive Coating Inside a Paint Spray Booth

Within the SLA community boundary, South Coast AQMD identified approximately 89 facilities with permitted automotive-type paint spray booths, 60 percent of which were inspected within the last five years.

Since the CSC has determined auto body shops to be facilities of concern, inspectors will focus additional efforts on these sites.

Having inspectors out in the field conducting inspections is crucial to ensure operators are complying with South Coast AQMD rules and helps to level the playing field and creating a deterrence to non-compliance. As to the violations cited in **Table 4-3**, the majority of violations issued to auto body shops are for:

1. operating a paint spray booth without a valid permit, and
2. storing or using non-compliant coatings or solvents on-site.

These facilities use VOC-containing paint and solvents, and their permit conditions generally set a limit on usage of these materials. However, concerns from members of the community are often focused on odors which are not directly addressed by applicable source specific rules and permit conditions.

The permissible usage of coatings at permitted auto body shops can nonetheless generate nuisance odors. Therefore, the primary regulatory approach to address and take enforcement

action on odors from an auto body shop is through Rule 402.[22] Rule 402 is the public nuisance regulation which applies to all facilities regardless of permitting or other applicable rules, and to enforce it, South Coast AQMD inspectors must verify the odors with members of the public and prove that the facility is the source of the odors. Therefore, receiving complaints from community members about particular auto body shops causing odors is crucial in addressing these concerns.

Mobile Sources

CARB is primarily responsible for enforcement of air quality regulations relating to trucks, buses, and other mobile sources, while South Coast AQMD is primarily responsible for enforcement relating to stationary sources (e.g., facilities). Therefore, the focus of South Coast AQMD's efforts around mobile sources within SLA has been to enforce CARB's truck idling regulation and respond to idling complaints.

Figure 4-14: Complaints Distribution of CSC Identified Concerns in SLA

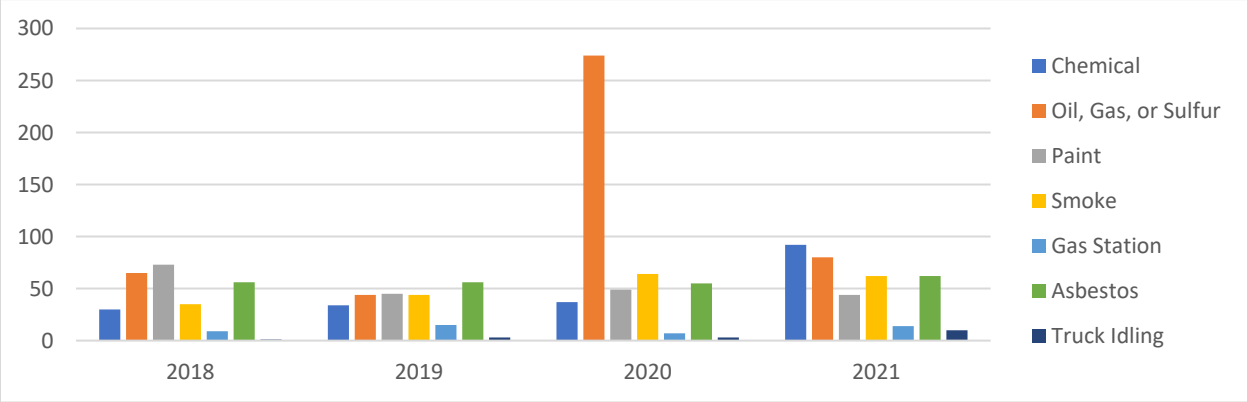


Figure 4-14, shows the number of complaints received from 2018 through 2021;[1] the complaints are categorized by complaint type which were CSC-identified areas of concern. Further, as **Figure 4-14** shows, while South Coast AQMD has not received a significant number of idling truck complaints, the CSC has identified idling trucks as a significant source of air pollution within their community. Therefore, South Coast AQMD is committed to increasing enforcement efforts on idling trucks within the community, which involves enforcing CARB's diesel truck idling regulation.[23] This effort will require CSC input on locations with idling concerns as well as outreach to the community via South Coast AQMD's complaint response program.

[22] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

[23] CARB's truck idling regulation expressly allows enforcement by local air quality regulators.

California Air Resources Board Enforcement Activity in South Los Angeles

CARB has authority to reduce emissions of air pollutants ranging from criteria air pollutants, like smog-forming nitrogen oxides (NOx) and VOCs, to TACs, like diesel particulate matter and greenhouse gases (e.g., methane). CARB is charged with enforcing its regulations applicable to mobile sources, consumer products, and other areawide categories, fuels, and climate programs. CARB is also charged with overseeing the implementation of local air district permit and enforcement programs implementing requirements that apply to stationary industrial pollutant sources. In addition, CARB has direct enforcement authority over climate programs, many of which impact stationary sources directly or indirectly.

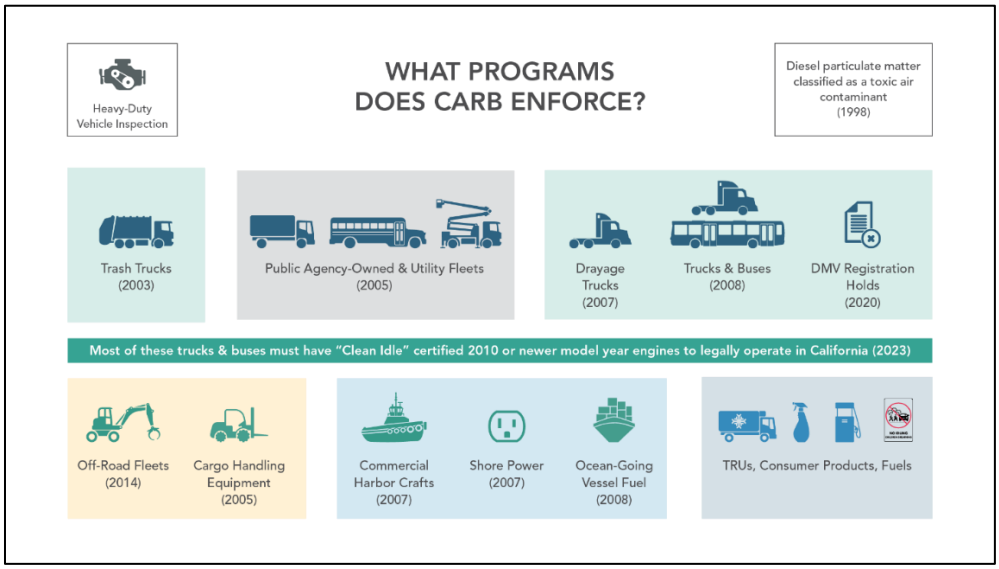
Diesel Vehicle Enforcement

CARB regulations establish stringent emission requirements that new diesel vehicles must meet. These requirements include installation of diesel particulate filters which remove more than 98 percent of toxic diesel particulate matter when properly functioning; and 90 percent of smog forming NOx. In addition, because diesel engines and heavy-duty vehicles and equipment are designed to last decades, CARB's diesel fleet regulations require operators to replace older, higher polluting vehicles and equipment with lower pollutant vehicles, equipment, and technologies to provide emission reductions as quickly as possible. These regulations apply to operators of on-road diesel vehicles such as trucks, and off-road diesel vehicles and equipment including construction and cargo handling equipment, commercial harbor craft, and other sources. As a result of these programs, CARB has greatly reduced diesel particulate and NOx emissions by over 90 percent in communities statewide.

Through its interaction with community members, CARB has heard the concerns of the community regarding diesel powered vehicles and equipment. Areas of concern CARB heard were:

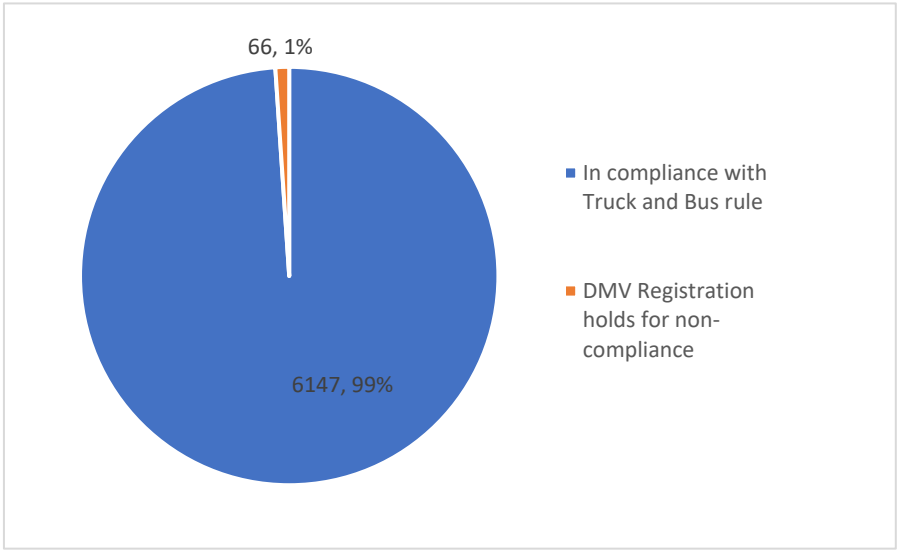
- Issues with heavy-duty diesel vehicle idling,
- The operation of trucks in and around warehouses,
- Compliance with state heavy-duty diesel vehicle regulations, and
- The operation of oil and gas extraction facilities in the community.

Figure 4-15: Programs CARB Enforces



In this section, CARB presents the history of enforcement activity related to the relevant enforcement programs in the SLA community from 2018 to 2021.[1] See **Figure 4-15** for a breakdown of CARB's enforcement activities in SLA from 2018 to 2021.[1] More details on general locations by year and by category within SLA's boundary can be found in CARB's Enforcement Data Visualization System (EDVS).[24]

Figure 4-16: Compliance with CARB's Truck and Bus Rule for Registered Trucks and Buses in SLA



Nearly all trucks and buses in California are already, or will be, required to have a certified 2010 or newer model year engines by the end of 2023 to comply with CARB's Truck and Bus rule to legally

[24] Since CARB cannot present personal information and these inspections are related to vehicles that are mobile, the best way to see the inspections and compliance status of vehicles traversing and servicing the SLA community is in CARB EDVS. Currently EDVS is updated annually. CARB intends to begin updating this quarterly beginning this year. A guide on how to use EDVS is here: https://ww2.arb.ca.gov/resources/fact-sheets/enforcement-data-visualization-system-fact-sheet

operate in California.[25] In fact, California is entering its third year where the California Department of Motor Vehicles (DMV) is holding registration for some trucks and buses that are not in compliance with CARB's Truck and Bus rule as a requirement of Senate Bill 1. Due to CARB regulation implementation and enforcement, the compliance rate statewide for the rule was 98 percent in 2020. **Figure 4-16** is based on California DMV registration data. In SLA it was 99 percent, meaning that of the 6,213 heavy-duty trucks and buses registered in SLA, 6,147 were in compliance with the Truck and Bus rule in 2020. The other 66 had registration holds placed on them, which meant they could not legally be driven in California.

Table 4-*4*: CARB Inspections in SLA from 2018 to 2021[1] for Truck Idling, Off-Road Equipment, and Transportation Refrigeration Units (TRUs)

	Idling	Off-road Equipment	TRUs
2018			
Inspections	16	14	0
Non-compliant	6	4[26]	0
Compliance rate	63%	71%	-
2019			
Inspections	2	79	0
Non-compliant	1	16[26]	0
Compliance rate	50%	80%	-
2020			
Inspections	48	6	7
Non-compliant	2	4[26]	5
Compliance rate	96%	33%	29%
2021			
Inspections	90	0	2
Non-compliant/ Pending	3	1[26]	1
Compliance rate	97%	0%	50%
2018 to 2021 Total			
Inspections	156	100	9
Non-compliant/ Pending	12	25[26]	6
Compliance rate	92%	75%	33%

[25] CARB, The Truckstop – Truck and Bus Regulation, https://ww2.arb.ca.gov/sites/default/files/truckstop/tb/truckbus.html

[26] These are non-emissions violations for lack of, or improper, labeling.

CARB's idling rules cover commercial vehicles, like trucks and buses, school buses, and off-road equipment. In general, there is a 5-minute idling limit statewide, but the rule allows vehicles and equipment to idle for longer periods under specified conditions, like when trucks are lined up waiting to get into a warehouse.

CARB conducted 156 idling inspections in SLA from 2018 to 2021[1] (**Table 4-4**). Twelve of those were out of compliance. The overall compliance rate of 92 percent is relatively high, but lower than the statewide average of 98 percent compliance. Thus, more inspections and other strategies will be useful to help deter illegal idling in the community.

The off-road diesel regulation applies to many types of heavy-duty diesel vehicles that aren't typically driven on the road, but rather used in construction and at oil and gas facilities. Looking at off-road fleet compliance in SLA from 2018 to 2021,[1] CARB inspected a total of 100 off-road pieces of construction equipment. Twenty-five of these were out of compliance with the labeling requirement of the regulation, but were compliant with emission and technology requirements of the rule.

Transportation refrigeration units (TRUs) keep goods cooled (or heated) in cargo containers during transport and are regulated by CARB under the TRU regulation. CARB conducted nine of those inspections between 2018 and 2021[1] in SLA and found six violations, all of which were for labelling and not non-compliance with engine technology or emission requirements. CARB's TRU rule typically has lower compliance rates, and so identifying areas where TRUs operate in SLA, and conducting inspections to enhance compliance could reduce emissions in the community.

Oil and Gas

In addition to CARB's mobile source regulations, CARB also enforces rules related to the extraction, refinement, and distribution of fuels. The California Oil and Gas Regulation (COGR) that was adopted in 2017 is intended to reduce fugitive and vented methane emissions from new and existing oil and gas facilities. In addition, methane releases may be accompanied by emissions of other organic compounds that cause odor.

Due to a memorandum of understanding with the South Coast AQMD, CARB did not conduct inspections at oil fields (active or idle wells) or drilling sites in SLA between 2018 and 2021.[1]

CARB is now starting to support the South Coast AQMD on enforcement of this regulation. However, based on input from the CSC, including what was learned on a tour of the Murphy Drill Site last year, CARB will develop a plan, in collaboration with the community and the South Coast AQMD, to:

- inspect oil and gas facilities in SLA for compliance with local and state regulations, and
- determine if regulations might be strengthened to better protect the community.

During the inspections, CARB will look at all sources of pollution located at these facilities, including stationary, portable, and mobile. CARB uses inspection equipment like mobile monitoring, optical gas imaging cameras, toxic vapor analyzers, infrared optical gas detectors, and eagle gas monitors as well as drones. CARB will document the results of the inspections and summarize what was learned in a report back to the community. This report back to the community will be in alignment with the CERP implementation used to ensure that CARB is responding to the needs of the community.

Community Concerns

CARB receives and responds to concerns identified by the community. This process is very important because CARB is likely unaware of the concern that is affecting the community. In addition to the programs described in CARB's discussion above, CARB will act on all complaints it receives. CARB received 60 complaints in the SLA community between 2018 and 2020, about three-quarters of the complaints CARB received between 2018 and 2020 were for 46 smoking vehicles. This means people saw a vehicle with smoke coming out of the exhaust pipe, and that the vehicle is likely in violation of CARB's smoke opacity rule.

Table 4-*5*: Complaints Received by CARB from SLA Zip Codes Between 2018 and 2020[27]

Complaint Type (Program Type)	Number	Action Taken[28]
Idling (Idling)	2	1 enforcement action taken, 1 under investigation
Light-duty vehicles	2	2 referred to appropriate agency or group within CARB
Smoking vehicle	46	10 enforcement actions taken, 35 under investigation, 1 not actionable
Solid waste collection vehicle	1	Under investigation
Tampering	1	Under investigation
TRU	1	Not actionable
Truck and Bus	7	2 enforcement actions taken, 3 under investigation, 2 not actionable

[27] There may be some overlap between complaints with the Southeast Los Angeles AB 617 community.

[28] Enforcement action means a violation occurred and CARB worked with the violator to resolve it. Under investigation means the investigation is on-going. Not actionable means there was incomplete information to take action, or the vehicle was in compliance. Referred to another agency means the complaint was assigned to the appropriate agency for resolution.

While CARB did not receive any complaints for oil and gas during that timeframe, CARB accepts and addresses all air quality complaints as they come into the system, including mobile sources and oil and gas facilities (**Table 4-5**).

Enforcement Considerations

An effective enforcement program must be flexible and adaptable to address the needs of the communities. Part of being adaptable is the ability to identify and address gaps in the enforcement process, such as previously unknown facilities or new pollutants of concern. As revealed over the course of the public process for CERP development, one such gap has been a lack of communication with members of the community, who have firsthand experience with local emissions sources and whose input can be extremely valuable to enforcement efforts. A mechanism that can be used to address such gaps, in partnership with local community members, is to conduct in-person community-based tours. This allows CARB and South Coast AQMD to learn directly from the community, and in collaboration with community members, develop and implement strategies to reduce emissions in the community.

In summary, the compliance process seeks to ensure that all rules and regulations are followed through a fair and robust enforcement program, resulting in reduced air pollution emissions. Adaptability is crucial, whether in the programs overall, or in day-to-day operations, to ensure that community concerns are addressed quickly and that enforcement action is taken when violations are identified.

Both CARB and South Coast AQMD enforcement teams will continue to search for innovative strategies, lead in community transparency, and take swift action to address non-compliance.

Chapter 5a

Introduction to Actions to Reduce Community Air Pollution

Community Air Quality Priorities

Through the development of the South Los Angeles (SLA) Community Emissions Reduction Plan (CERP) and based on sources of air pollution that are of concern to the community, the Community Steering Committee (CSC) identified the following air quality priorities (**Figure 5a-1**):

- Mobile Sources,
- Auto Body Shops,
- General Industrial Facilities,
- Metal Processing Facilities, and
- Oil and Gas Industry.

Figure 5a-1: Air Quality Priorities Identified by the SLA CSC

Mobile Sources

Auto Body Shops

General Industrial Facilities

Metal Processing Facilities

Oil and Gas Industry

These air pollution sources are often near homes, schools, and other areas where the community can be exposed to harmful pollutants. To reduce air pollution from these sources, the CSC developed a set of actions to be implemented by government agencies in collaboration with community-based organizations, businesses, and other entities, as described in the following subchapters.

Subchapters 5b through 5f focus on each air quality priority identified by the CSC.

Authority (Jurisdiction) of Governmental Agencies and Ongoing Efforts

Multiple government agencies may be involved when addressing an air quality priority, as each agency has its own specific authority to protect the environment and community. Authority varies based on the source of the emissions such as mobile or stationary, pollutants such as greenhouse gas emissions, criteria pollutants, or toxic air contaminants (TACs), and the environmental media such as air, soil, solid waste. The South Coast Air Quality Management District (South Coast AQMD) has authority over stationary sources which are generally fixed facilities such as dry cleaners, refineries, power plants, factories, and metal processing facilities as well as indirect sources, fixed locations that are associated with mobile sources such as ports, railyards, and warehouses. California Air Resources Board (CARB) and United States Environmental Protection Agency (U.S. EPA) develop, implement, and enforce air quality regulations to reduce air pollution from mobile sources such as trucks, ships, and locomotives. South Coast AQMD, CARB, and U.S. EPA develop, implement, and enforce rules and regulations for sources which they have regulatory authority.

In areas where South Coast AQMD and CARB do not have direct authority, implementation of the Assembly Bill 617 (AB 617) program may include informing the CSC of ongoing efforts conducted by other responsible agencies. For example, the California Geologic Energy Management Division (CalGEM), a state agency, is developing a public health rule to update public health and safety protections for communities near oil and gas production operations, which includes prohibiting new oil wells within a certain distance of sensitive receptors. Local land-use agencies can establish long-term goals, ordinances, and policies for land use that can also have an impact on local air pollution (e.g., Los Angeles County Green Zones Program,[1] Los Angeles County Oil Well Ordinance,[2] prohibition of new oil and gas extraction[3]).

Beyond the CERP and CAMP requirements, AB 617 also requires that air districts expedite implementation of Best Available Retrofit Control Technology (BARCT) for facilities in the

[1] Los Angeles County Department of Regional Planning, Green Zones Program, https://planning.lacounty.gov/greenzones#:~:text=Initiated%20by%20the%20Board%20of,bear%20a%20disproportionate%20pollution%20burden. The Los Angeles County Green Zones Program enhances public health and land use compatibility in the unincorporated communities that bear a disproportionate pollution burden.

[2] Los Angeles County Department of Regional Planning, Oil Well Ordinance, https://planning.lacounty.gov/oilwell. The Los Angeles County Oil Well Ordinance will update permit requirements and development operating standards for existing and new oil wells and accessory facilities in unincorporated LA County.

[3] City of Los Angeles, LACityClerk Connect, Council File: 17-0447, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0447. On January 26, 2022, the City of Los Angeles City Council passed a recommendation for the mayor to develop an ordinance requiring a new policy be drafted to prohibit new oil and gas extraction, make extraction activities a nonconforming use in all zones, ensure plugging and abandonment of wells, and conduct comprehensive site remediation.

California Greenhouse Gas Cap-and-Trade program.[4] South Coast AQMD's REgional CLean Air Incentives Market (RECLAIM) program includes facilities within the California Greenhouse Gas Cap-and-Trade program. In 2017, the South Coast AQMD Governing Board directed South Coast AQMD to transition facilities out of the NOx RECLAIM program and begin to regulate those sources under a command-and-control approach. As a result, South Coast AQMD began to develop new or amend existing rules to update or add emission limits that reflects BARCT to ensure as facilities transition out of RECLAIM there is a "landing rule" that regulates NOx emissions for each unit or process. The limits were determined based on a BARCT analysis, consistent with the Health and Safety Code, that evaluates not just technological feasibility but cost-effectiveness of controls to meet those emission limits. To date, BARCT emissions limits have been established for ten rules and South Coast AQMD is currently developing or amending four additional rules. More information on BARCT, RECLAIM facilities, and rule developments can be found in Appendices 2a: Community Profile and 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

Opportunities for Action

In addition to the ongoing efforts described above, the community co-leads guided the South Coast AQMD in collaboration with the CSC, to identify priorities to reduce air pollution in the SLA community. For each air quality priority, this CERP defines a path for further reductions of emissions and exposure through identifying goals with corresponding action(s), metric(s), timeline(s), and responsible entities. This path utilizes strategies, including rules and regulations,[5] air monitoring, enforcement, incentives, collaborations, and information and outreach to achieve localized reductions, share emissions data, and provide other related information to address the community's concerns. Further, the CSC requested that the community be involved in implementing this CERP and suggested that agencies work with community-based organizations to invest in community projects. Throughout implementation, the CSC may have opportunities, if funds are available, to allocate Community Air Protection (CAP) incentive funds for projects supported by actions in this CERP. South Coast AQMD commits to working collaboratively with the CSC throughout CERP implementation. Additionally, the CSC has been listed as a responsible entity in several actions.

[4] CARB, Cap-and-Trade Program, https://ww2.arb.ca.gov/our-work/programs/cap-and-trade-program/about. The Cap-and-Trade Program is a key element of California's strategy to reduce greenhouse gas (GHG) emissions. The Cap-and-Trade Regulation establishes a declining limit on major sources of GHG emissions throughout California, and it creates a powerful economic incentive for significant investment in cleaner, more efficient technologies. The Program applies to emissions that cover approximately 80 percent of the State's GHG emissions.

[5] South Coast AQMD, Regulations, http://www.aqmd.gov/home/rules-compliance/regulations#:~:text=At%20South%20Coast%20AQMD%2C%20a,and%20administered%2C%20and%20their%20impact. At South Coast AQMD, a regulation is composed of rules, each of which deals with a specific topic within that regulation.

The goals, actions, and metrics are written to allow some flexibility during CERP implementation. If goals, actions, and metrics are overly specific, South Coast AQMD may be limited to what is written in the adopted CERP during implementation and it may be difficult to adjust strategies to accommodate new findings or innovative approaches. Although there is some room for flexibility, strategies cannot expand beyond the original scope and intent of the goals, actions, and metrics. For example, if the CERP specifies that incentives may be used to support zero-emission technologies, then incentive funds can only go to zero-emission technologies and funds cannot be used for lesser stringent technologies (e.g., near-zero emission technologies). Therefore, SLA may forego potential emission reductions if zero-emission technologies are not commercially available.

Emissions Reduction Targets

AB 617 requires emissions reduction programs, such as this CERP, to include emissions reduction targets.[6,7] This CERP will project emissions reductions for nitrogen oxides (NOx) and diesel particulate matter (DPM) in tons per year (tpy). To accurately determine emissions reductions, a baseline is established based on the year prior to community designation[8] (as described in Chapter 2d: Emissions and Source Attribution). **Table 5a-1**: CERP Emissions Reduction Targets

includes an emissions baseline for 2019, projected future baseline emissions for 2026 and 2031, emissions reductions from this CERP in 2026 and 2031, and an overall percentage of emissions reductions from 2019.

[6] California Health and Safety Code, Section 44391.2 (c)(3)

[7] CARB, Community Air Protection Blueprint, Appendix C. Criterial for Community Emissions Reduction Programs, https://ww2.arb.ca.gov/sites/default/files/2018-10/final_community_air_protection_blueprint_october_2018_appendix_c.pdf

[8] SLA is considered as a 2020-designated community, despite its delayed designation by CARB in February 2021.

Table 5a-1: CERP Emissions Reduction Targets

Year	Emissions	NOx	DPM
2019	Baseline Emissions (tpy)*	3,339	41.14
2026	Projected 2026 Baseline Emissions (tpy)*	2,179	18.22
	Emissions Reductions from CERP (tpy)**	193	2.32
	Overall Emissions Reductions from 2019 (%)	**41**	**61**
2031	Projected 2031 Baseline Emissions (tpy)*	1,957	15.93
	Emissions Reductions from CERP, by 2031 (tpy)**	300	3.82
	Overall Emissions Reductions from 2019 (%)	**50**	**71**

* Emissions were developed and presented in tons per day unit in Chapter 2d and Appendix 2d.

** Estimated NOx and DPM emissions reduction targets from this CERP are from projected incentive projects (assuming a minimum of $10 million invested for mobile source projects) and emissions reduction targets from CARB's statewide measures listed in Table 5a-3 "Estimated Emissions Reduction Targets for CARB Statewide Measures."

To address the CSC identified air quality priorities, the following rule developments or amendments with potential volatile organic compounds (VOCs), fugitive dust, metal particulate, and hexavalent chromium are listed in **Table 5a-2**, which also lists the associated air quality priority, potential applicability, and the pollutants to be reduced. Estimating emission reductions from these proposed and proposed amended rules is too speculative at this point. South Coast AQMD will work with a Working Group that will include SLA CSC members as well as other stakeholders, such as other environmental and community groups, CSC members from other communities, businesses, and other agencies, that will provide input regarding the scope and possible amendments to address the actions in the CERP for the various rule topics. As the rule proposal is developed, the air quality benefits and emission reductions will be quantified, to the extent feasible. Quantifying emission reductions attributed to fugitive emissions are more challenging and may be qualitatively discussed.

Table 5a-2: South Coast AQMD Rule Developments with Potential Emission Reductions

Proposed Rule (PR) or Proposed Amended Rule (PAR)	Air Quality Priority	Potential Applicability	Pollutant
PR 403.2	Mobile Sources	Activities conducted for large roadway projects	Fugitive dust
PAR 1151	Auto Body Shops	Any facility using automotive coatings, including auto body shops	VOCs
PAR 1171	Auto Body Shops	Any facility conducting solvent cleaning operations, including auto body shops	VOCs
PR 1426.1	Metal Processing Facilities	Any facility conducting metal finishing operations not subject to Rule 1469	Hexavalent Chromium
PR 1445	Metal Processing Facilities	Any facility conducting laser arc cutting operations	Hexavalent chromium and toxic metal particulate
PR 1460	Metal Processing Facilities	Metal recycling facilities and metal scrapyards	Particulate Matter
PAR 1148.1	Oil and Gas Industry	Oil and gas production wells	VOCs

Estimated Emissions Reductions from California Air Resources Board Statewide Measures

CARB's statewide strategy provided in this CERP accounts for the combined effects of regulations currently under rulemaking for a future year. Potential emission reductions from proposed regulations for a specified year are applied to account for multiple regulations that may affect a specific source category. For example, if two regulations are applicable to the same source of emissions (e.g., trucks) then a new baseline is established by applying the statewide reduction factors from the first proposed regulation to the original baseline, and then reductions from the second regulation are calculated based on the newer established baseline.

It is important to note that most of these regulations are in early phases of development and their adoption and implementation timelines have not yet been established. Additionally, the statewide emission inventory used to estimate the potential emission reduction factors for these

strategies are derived from draft regulatory inventories that will continue to be revised through the regulation development process. Once a statewide strategy or regulatory measure is adopted, emission reduction factors and related benefits will be updated to reflect the final inventory used in the regulation. Accordingly, the draft statewide emissions reduction estimates presented in this CERP should only be used as rough estimates that are subject to change in the future.

CARB has estimated the emissions reductions benefits for some of the proposed statewide measures as shown in **Table 5a-3**. The "Action Date" listed in **Table 5a-3** reflects the year of the anticipated adoption date by CARB's Governing Board. As the primary state entity responsible for obtaining emission reductions from mobile sources, CARB's proposed new measures assist the South Coast AQMD achieve the necessary emission reductions to attain federal air quality standards reflecting the combined reductions from the existing control strategy and new measures. If a particular measure does not achieve its expected emission reductions, CARB is still responsible to achieve the total aggregate emission reductions. CARB emission reduction commitments may be achieved through a combination of control measures, incentive funds, or other enforceable measures. In South Coast AQMD's 2016 Air Quality Management Plan, CARB identified measures to achieve a 70 percent reduction (266 tons per day) in NOx emissions from mobile measures by 2023, and an 80 percent reduction (295 tons per day) by 2031 in the South Coast Air Basin.[9]

[9] South Coast AQMD, 2016 Air Quality Management Plan, Appendix IV-B: CARB's Mobile Source Strategy, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-iv-b.pdf

Table 5a-3: Estimated Emissions Reduction Targets for CARB Statewide Measures†

Proposed Statewide Measure	Action Date	Emissions Reductions Targets 2026/2031 (tpy)							
		NOx		VOC		DPM		PM2.5	
		2026	2031	2026	2031	2026	2031	2026	2031
Advanced Clean Fleet[10]	2023	5.3	24	-	-	0.0	0.0	0.1	0.6
Advanced Clean Car II[11]	2022	2.1	27	1.3	21	0.0	0.0	0.6	7.6
Heavy-Duty Inspection and Maintenance[12]	2021	122	140	-	-	1.0	1.0	1.0	1.0
Small Off-Road Engine Amendment[13]	2021	19	60	144	416	-	-	1.4	3.9
Transport Refrigeration Unit Regulation[14]	2022	3.5	8.5	0.4	1.1	1.3	2.8	1.2	2.6
Total		**152**	**259**	**146**	**438**	**2.3**	**3.8**	**4.2**	**16**

† Emissions reduction targets based on estimates from CARB. Emissions reductions are subject to future assessment and regulatory analysis that may result in adjustments.

[10] CARB, Advanced Clean Fleets, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets

[11] CARB, Advanced Clean Cars II, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii

[12] CARB, Heavy-Duty Inspection and Maintenance Program, https://ww2.arb.ca.gov/our-work/programs/heavy-duty-inspection-and-maintenance-program

[13] CARB, Small Off-Road Engine (SORE), https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore

[14] CARB, New Transport Refrigeration Unit Regulation in Development, https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/new-transport-refrigeration-unit-regulation

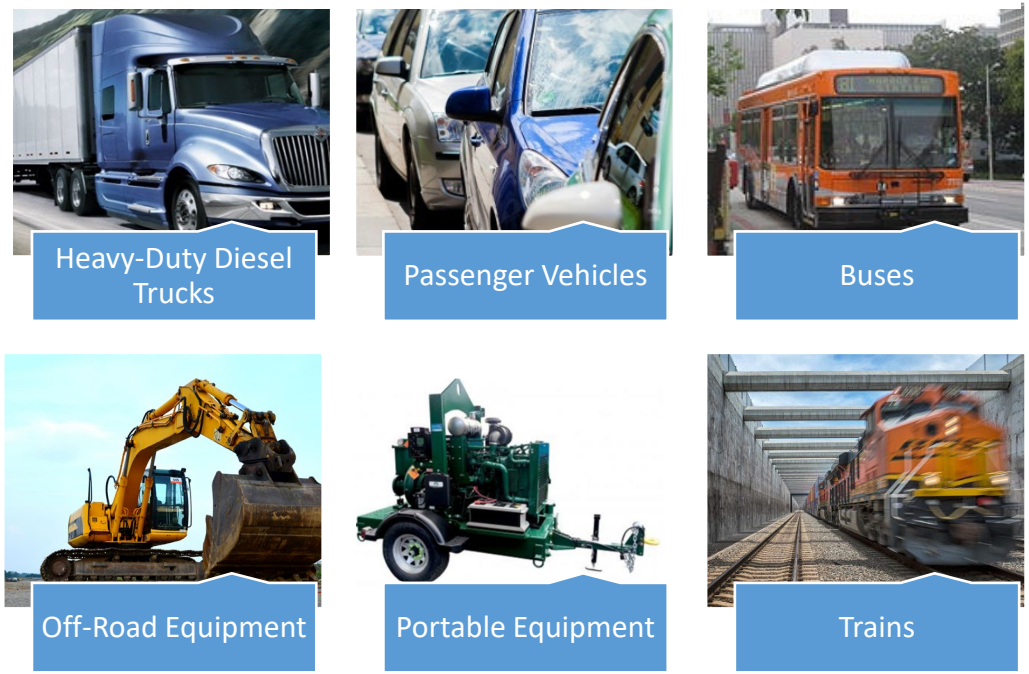
Chapter 5b

Mobile Sources

Community Concerns

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). One of the concerns raised by the South Los Angeles (SLA) community is mobile sources. This concern stems from the volume and frequency of vehicles and trains that travel through the community. Mobile sources are categorized into two main groups: on-road mobile sources and off-road mobile sources. On-road mobile sources generally includes motor vehicles that travel on roads and highways such as trucks, buses, and cars. Off-road mobile sources include a wide variety of non-road mobile sources such as construction equipment, marine vessels, locomotives, and aircrafts (**Figure 5b-1**). Specific community concerns surrounding these sources from vehicles include:

Figure 5b-1: Examples of Mobile Sources



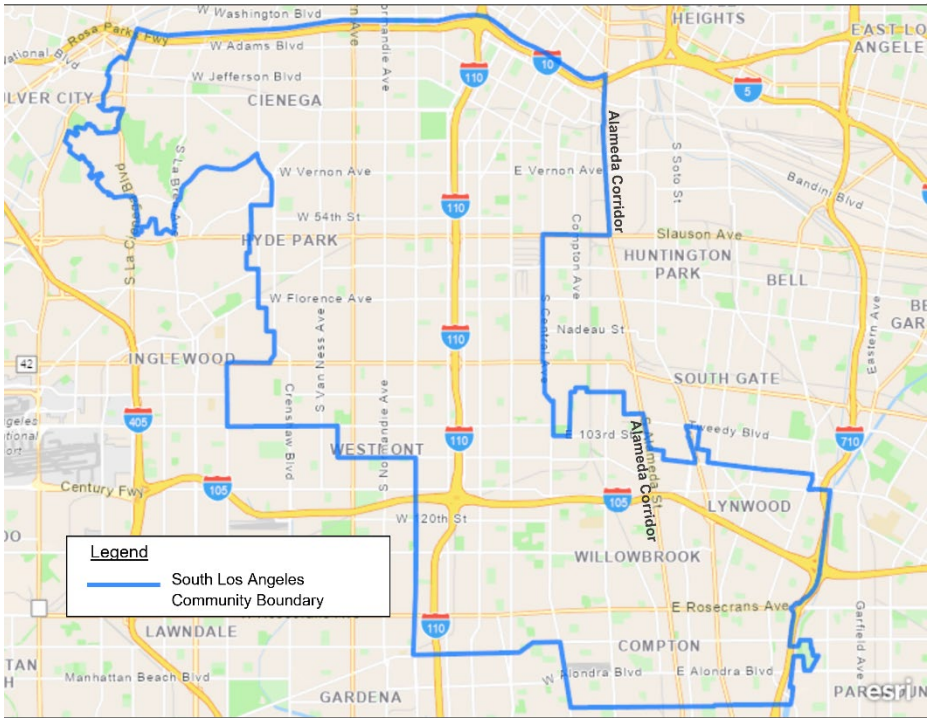
1. Emissions and adverse health impacts from heavy-duty diesel trucks, trains, buses, ice cream trucks, and automobiles due to neighborhood traffic;
2. Freeway rush hour traffic;
3. Truck and bus maintenance in residential neighborhoods;
4. Movement of goods at warehouses; and
5. Proximity of truck routes and idling trucks to residential areas and schools.

As it relates to the community's concerns, many mobile sources are powered by diesel. Diesel particulate matter (DPM) is a byproduct of diesel combustion and is currently the main toxic air contaminant (TAC) in this community. To understand existing mechanisms in place that apply to these concerns, the community requested clarification regarding inspection programs and current rules and

regulations for mobile sources. More information on inspection programs and rules and regulations can be found in Chapter 4: Enforcement Overview and History and Appendix 5b: Mobile Sources, respectively.

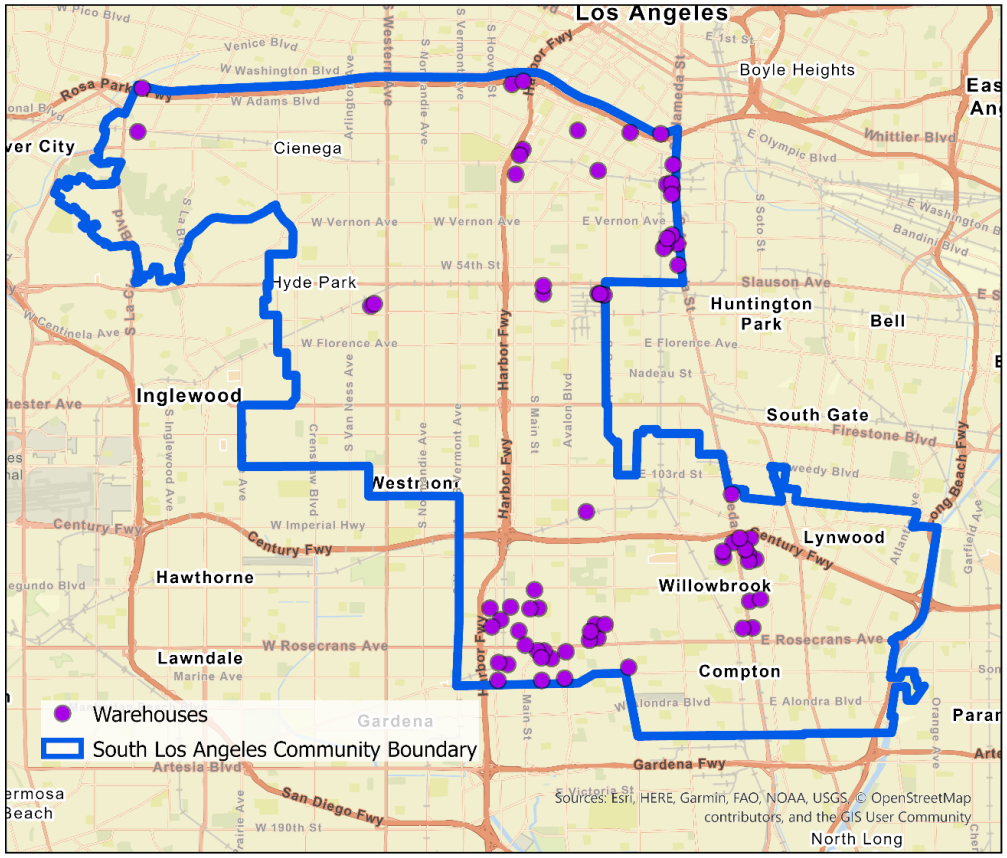
The SLA community includes more than 26.8 miles of freeways, and many of these are located near residential areas. SLA is bounded by Interstate 10 (I-10) to the north, Interstate 710 (I-710) and the Alameda Corridor to the east, and State Route 91 (SR-91) to the south, with Interstate 105 (I-105), Interstate 110 (I-110), and Slauson Corridor crossing through the community (**Figure 5b-2**). The ports are not within the community boundary and are not included as an air quality priority in this CERP, but the effects of their truck traffic are felt throughout the community. Additionally, the SLA community has approximately 70 warehouses subject to Rule 2305[1] as shown in **Figure 5b-3**, which account for a portion of truck traffic in the community.

Figure 5b-2: SLA Community Boundary



[1] South Coast AQMD, Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf

Figure 5b-3: Warehouse Subject to Rule 2305 in SLA



Regulatory Background

The California Air Resources Board (CARB) primarily regulates mobile sources. South Coast AQMD has limited authority over mobile sources, but local air districts and other agencies may be given authority to enforce CARB's mobile source regulations. For example, the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling,[2] also known as the "No-Idling Regulation," may be enforced by police officers and air districts. To advance cleaner mobile source technologies, achieve emission reductions from mobile sources sooner, and to support AB 617's broader effort, CARB also oversees and approves use of the Community Air Protection (CAP) Incentives, [3] which provide mechanisms to expedite air quality benefits to impacted communities for a variety of project types, including commercially available cleaner technology trucks, electric school buses for low-income schools, and locomotives. For more information related to mobile source regulatory efforts and incentive opportunities, please refer to Appendix 5b: Mobile Sources.

[2] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling

[3] CARB, Community Air Protection Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives

Actions to Reduce Emissions or Exposure

For mobile sources, the CSC requested additional enforcement of mobile source regulations and outreach efforts to inform the community about and increase availability to incentives programs, such as affordable alternative energy vehicles for the community. Mobile source categories of concern identified by the CSC include: heavy-duty diesel trucks, trains, buses, and automobiles due to neighborhood traffic, freeway rush hour traffic, truck and bus maintenance in residential neighborhoods, movement of goods at warehouses, and the proximity of truck routes and idling trucks to residential areas and schools.

The CSC requested the following goals for mobile sources in SLA:

A. Reduce exposure to emissions from warehouses and idling of buses and trucks.
B. Reduce students' exposure to air pollution, especially mobile source emissions.
C. Inform the community and businesses and industries in SLA's boundary of CARB's mobile source regulations, best management practices, how to file a complaint, and incentive programs and collect feedback on CARB's complaint filing system.
D. Incentivize funding opportunities for cleaner mobile source technologies (e.g., lower emitting trucks and buses, electric vehicles) within the community (e.g., schools, small businesses, independent truck owners or operators).
E. Reduce emissions at construction sites.
F. Reduce exposure from truck traffic through collaboration with agencies responsible for designating truck routes.

The CSC developed the following CERP actions to address community concerns regarding the six CERP goals. **Table 5b-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from mobile sources in SLA.

Table 5b-1: Actions to Reduce Emissions from and Exposure to Mobile Sources

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Warehouses and Idling	• Conduct idling inspection sweeps at locations of concern identified by the CSC • Explore opportunities to make Rule 2305 Warehouse Actions and Investments to Reduce Emissions (WAIRE) reports available on the F.I.N.D. tool	South Coast AQMD	• Number of idling inspection sweeps at CSC-identified locations • Provide update to the CSC regarding availability	3rd quarter, 2022	2nd quarter, 2027

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	• Report on Rule 2305 implementation and enforcement in the SLA community • Conduct outreach to warehouses regarding South Coast AQMD Rule 2305 requirements to reduce the impact of truck traffic		of WAIRE reports on F.I.N.D. • Annual update to the CSC on Rule 2305 implementation and enforcement • Number of materials distributed to warehouses		
B: Reduce Exposure at Schools	• Work with local school districts and the CSC to develop a prioritization list of schools for air filtration systems • Conduct outreach to the CSC when new funding opportunities are available to install school filtration systems • Use the prioritization list and funding criteria to inform the installation of air filtration systems in schools that meet a Minimum Efficiency Reporting Value (MERV) 16[4], where technically feasible[5] • Work with local school districts and CSC to support community projects that reduce students' exposure to air pollution (e.g., Safer Routes to Schools program)	South Coast AQMD Local School Districts CSC	• Number of identified funding sources for school air filtration systems • Total incentive dollars allocated for air filtration systems • Provide prioritization list to receive air filtration systems • Number of schools that install air filtration systems[6] with specified MERV rating • Number of community projects supported	1st quarter, 2023	2nd quarter, 2027

[4] U.S. EPA, What is a MERV rating?, https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating

[5] Availability of funding, compatibility of MERV 16 filtration systems with existing school infrastructure (e.g., HVAC systems), and other factors determine technical feasibility.

[6] Total number of schools to receive air filtration systems is dependent on total AB 617 CAP Incentives allocated or identification of other funding sources for installation of air filtration systems in SLA.

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
C: CARB Efforts	• Conduct outreach to the community and businesses and industries in SLA by distributing materials related to CARB's mobile source regulations, best management practices, how to file a complaint, and incentive programs (e.g., provide materials to independent owners or operators and students to share with families, truck unions) • Conduct an activity or solicit input through the CSC's contacts in the community to collect feedback on CARB's complaint filing system • Conduct compliance inspections of trucks and buses including Truck and Bus,[7] TRU,[8,9] and Idling regulations with input from the CSC on locations of concern • CARB will adjust enforcement in the community to address the identified concerns and report back to the CSC annually for future adjustments • Install "No Idling" signs in CSC-identified idling locations	CARB	• Identify outreach opportunities • Number of outreach events or materials distributed to the community and businesses • Number of updates on feedback regarding potential improvements to CARB's complaint filing system • Number of truck and bus inspections at CSC-identified locations • CARB to provide CSC an annual update on potential enforcement approach adjustments • Number of signs installed	4th quarter, 2022	2nd quarter, 2027

[7] CARB, Truck and Bus Regulation, https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation
[8] Transport Refrigeration Unit (TRU)
[9] CARB, TRU, https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
D: Mobile Source Incentives	• Explore opportunities for incentive funds for cleaner mobile source technologies (e.g., lower emitting trucks and buses, electric vehicles) within the community (e.g., schools, small businesses, independent truck owners or operators) Conduct outreach to the CSC when new funding opportunities (e.g., Replace Your Ride) are available to incentivize replacing older, higher polluting on-road (e.g., trucks and buses, cars) and off-road (e.g., locomotives) equipment with cleaner technology	South Coast AQMD CSC	• Number of identified funding sources for cleaner mobile source technologies • Total incentive dollars allocated for cleaner mobile source technologies • As needed, develop and submit AB 617 Project Plan(s)[10] • Number of incentive outreach actions (e.g., e-mail announcements, participation in expositions) completed	1st quarter, 2023	2nd quarter, 2027
E: Construction Sites Enforcement	Focused enforcement at construction sites of concern, as identified by the CSC, to evaluate compliance with CARB regulations (e.g., CARB's Off-Road Diesel Regulation, Portable Equipment Registration Program)	CARB South Coast AQMD	Number of enforcement updates to the CSC	4th quarter, 2022	2nd quarter, 2027
F: Agency Collaboration	Pursue collaborations with local agencies (e.g., city, county, transportation) to identify strategies to address the CSC's concerns	South Coast AQMD	Number of collaboration updates provided to the CSC	1st quarter, 2023	2nd quarter, 2027

[10] CARB, Community Air Protection Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	with truck traffic and designated truck routes (e.g., enforcement of truck routes, proximity to sensitive receptors, feasibility of physical barriers for residential neighborhoods)	CARB			

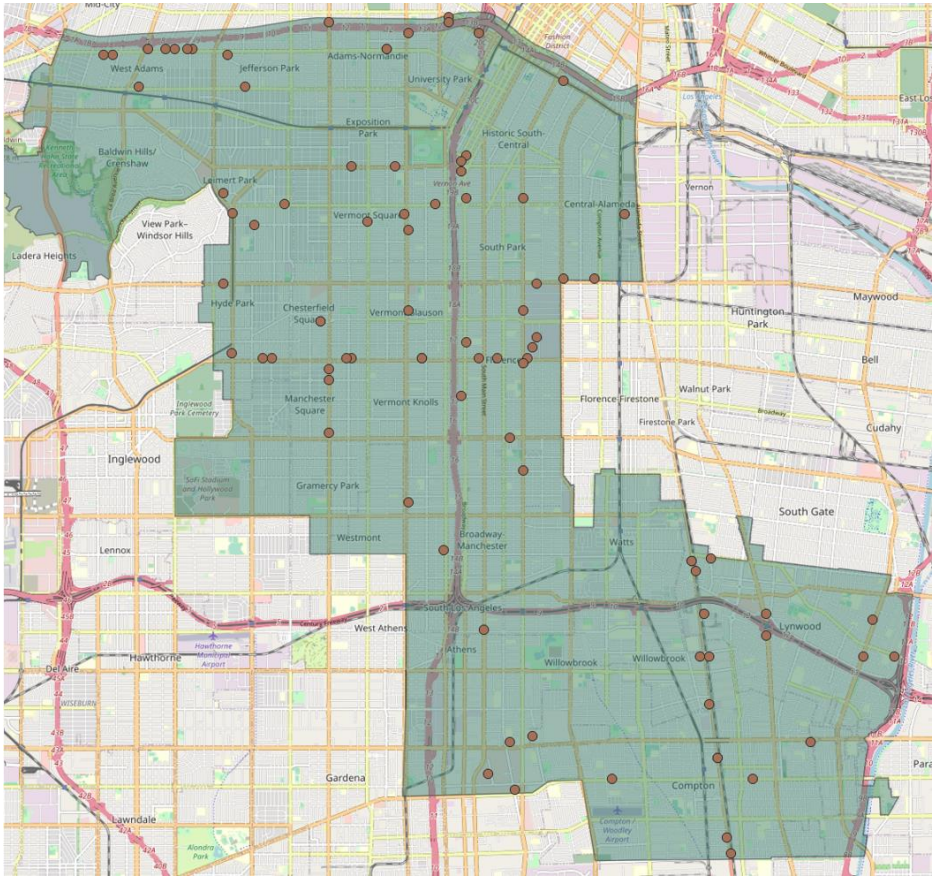
Chapter 5c

Auto Body Shops

Community Concerns

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC identified auto body shops as an air quality concern for this community. During the CSC meetings, concerns were raised regarding the volume and activities of both permitted and unpermitted auto body shops and their proximity to residences, schools, and public gathering areas. The CSC has also expressed concerns with soil and water contamination, proper hazardous waste disposal, land-use issues, worker exposure, and noise pollution from some auto body shops. CSC members identified facilities and operations conducted at vacant lots on Central Avenue, Florence Avenue, Western Avenue, Jefferson Boulevard, Manchester Avenue, and the Slauson Corridor as a few locations of concern. CSC members believe that these small businesses are likely unaware of existing regulatory requirements, best management practices to reduce pollution burden, and the health impact of their operations on the community.

Figure 5c-1: Permitted Auto Body Shops in SLA



Regulatory Background

South Coast Air Quality Management District's (South Coast AQMD's) permitting program was established to implement the requirements of the federal and state Clean Air Acts (CAAs), and applicable air quality rules and regulations by specifying operating and compliance requirements for stationary sources that emit air contaminants. Based on the South Coast AQMD permitting database, there are approximately 89 permitted[1] auto body shops within the SLA community boundary (**Figure 5c-1**). South Coast AQMD utilizes multiple methods to classify facility types including the North American Industrial Classification Codes (NAICS), a key data source for information in this CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code),[2] to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which inspection team conducts the inspection for each facility, which is directly tied to the TS-Code. Permitted auto body shops must comply with the requirements in the permit(s) issued by South Coast AQMD as well as any applicable South Coast AQMD rules. Auto body shops conduct a variety of operations specializing in the repair of vehicles by fixing paint or body damage from scratches, dents, and collisions. Coating application equipment, emissions from automotive coating, and solvent cleaning materials and their related operations conducted by auto body shops may be subject to South Coast AQMD's Rules, such as Rules 481,[3] 1151,[4] 1168,[5] and 1171.[6] If vehicles are not present but coatings are being applied to metal parts, auto body shops may be subject to Rule 1107.[7] California Air Resources Board's (CARB's) Consumer Products Regulation[8] may apply to products used at auto body shops. Some of these products may cause odors and emit air pollutants, including volatile organic compounds, and may include toxic air contaminants (TACs). The emissions and odors may come from solvents evaporating from paint and solvent application, cleaning of parts, and improper storage. Auto body shops may also conduct operations such as sanding and grinding, which can emit fine dust. Auto body

[1] Any equipment that emits or controls air contaminants (such as nitrogen oxides or reactive organic gases) requires a permit from South Coast AQMD prior to construction, installation, or operation unless it is specifically exempted from the permit requirement by South Coast AQMD per Rule 219 – Equipment not Requiring a Written Permit Pursuant to Regulation II, http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf

[2] TS-Code refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

[3] South Coast AQMD, Rule 481 – Spray Coating Operations, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-481.pdf

[4] South Coast AQMD, Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1151.pdf

[5] South Coast AQMD, Rule 1168 – Adhesive and Sealant Applications, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1168.pdf

[6] South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf

[7] South Coast AQMD, Rule 1107— Coating of Metal Parts and Products, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1107.pdf

[8] CARB, Consumer Products Program, https://ww2.arb.ca.gov/our-work/programs/consumer-products-program

shops subject to CARB's Criteria Pollutant and Toxics Emissions Reporting (CTR) regulation will begin reporting emissions to South Coast AQMD in spring of 2025.[9] For additional details regarding regulatory efforts for and regulations related to auto body shops, please refer to Appendix 5c: Auto Body Shops.

Actions to Reduce Emissions or Exposure

During development of this CERP, the CSC requested that both outreach and enforcement be conducted at auto body shops to inform these businesses of operational requirements mandated by various government agencies with authority over this industry, such as South Coast AQMD, local land-use agencies, and local fire departments. The CSC requested the following goals for auto body shops in SLA.

A. Inform the community of applicable rules and regulations, monitoring and enforcement efforts, and the permitting process as they relate to auto body shops.
B. Identify facilities of concern, conduct enforcement activity, and conduct outreach on best management practices at these facilities.
C. Collaborate with appropriate agencies when issues are identified at auto body shops during inspection sweeps to ensure these facilities follow rules and regulations from appropriate agencies, in particular those related to soil contamination, hazardous waste disposal, land-use, and noise pollution.
D. Inform auto body shops of best management practices and applicable rules and regulations, and provide information on South Coast AQMD's Small Business Assistance program.[10]
E. Conduct air measurement surveys to identify facilities with potential elevated emissions and to characterize these emissions.
F. Ensure facilities are properly classified and verify compliance with applicable rules and regulations.
G. Reduce emissions and exposure to auto body shops through rule amendments to Rules 1151[11] and 1171.[12]

[9] CARB, Criteria Pollutant and Toxics Emissions Reporting (CTR), https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting
[10] South Coast AQMD, Small Business Assistance, http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance
[11] South Coast AQMD, Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1151.pdf
[12] South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf

H. Incentivize funding opportunities for low-volatile organic compound (VOC) paint and coatings and water-based cleaners used at auto body shops within the community.

The CSC developed the following CERP actions to address community concerns regarding the eight CERP goals. **Table 5c-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from auto body shops in SLA.

Table 5c-1: Actions to Reduce Emissions from and Exposure to Auto Body Shops

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Inform Community of Pertinent Rules	• Conduct a workshop for the CSC describing applicable rules and regulations, permitting process, and enforcement efforts around auto body shops • Collaborate with partner agencies who also have jurisdiction over auto body shops (e.g., local land-use agencies, Bureau of Automotive Repair, Department of Toxics Substances Control (DTSC), Certified Unified Program Agencies (CUPA), local fire departments) to present information regarding their authority at Auto Body Shops Workshop • Collaborate with CSC to present information regarding their concerns related to auto body shops at Auto Body Shops Workshop (e.g., safer alternatives, processes to reduce emissions and exposures)	South Coast AQMD CARB	Conduct Auto Body Shops Workshop for the CSC	1st quarter, 2023	2nd quarter, 2025
B: Identify Facilities of Concern	• Work with the CSC to identify and prioritize locations of concern • Conduct auto body shop inspection sweeps, prioritizing CSC-identified locations, and	South Coast AQMD CSC	• Develop list of identified and prioritized locations of concern, in part using data reporting	2nd quarter, 2022	2nd quarter, 2026

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	taking enforcement action when appropriate		from CARB's CTR regulation • Number of inspection sweeps and enforcement actions		
C: Agency Collaboration and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during auto body shop inspection sweeps (e.g., Bureau of Automotive Repair, California Division of Occupational Safety and Health (Cal/OSHA), CUPA, public health departments, DTSC, local fire departments)	South Coast AQMD CARB	Number of updates regarding referrals or follow-up information presented by the appropriate agency(ies) to the CSC	2nd quarter, 2022	2nd quarter, 2027
D: Outreach to Owners or Operators	• Conduct targeted outreach to owners or operators in the SLA community, including providing information on best management practices, South Coast AQMD's Small Business Assistance Program, permitting process, and applicable rules and regulations • Conduct outreach to CSC-identified locations to encourage incorporation of best management practices (e.g., United States Environmental Protection Agency (U.S. EPA) Collision Repair Campaign,[13] U.S. EPA Best Workplace Practices[14]) and "Good Neighbor" practices, including seeking feedback from owners or operators	South Coast AQMD CSC	• Number of outreach events or materials distributed to auto body shops • Number of auto body shops outreached • Number of auto body shops that provided feedback, if owners or operators are willing to disclose	2023	2025

[13] U.S. EPA, Collision Repair Campaign to Reduce Air Toxics, https://www.epa.gov/collision-repair-campaign

[14] U.S. EPA, Best Workplace Practices for Automotive Repair and Fleet Maintenance, https://archive.epa.gov/epa/saferchoice/best-workplace-practices-automotive-repair-and-fleet-maintenance.html

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	regarding their understanding of applicable requirements and/or their willingness to incorporate best management or "Good Neighbor" practices				
E: Air Measurements Survey	Conduct initial air measurements surveys near facilities of concern (as identified under Goal B) to identify and characterize any potential emissions	South Coast AQMD	• Number of air measurements surveys • Number of updates provided to the CSC	2nd quarter, 2022	2nd quarter, 2027
F: Focused Facility Enforcement	Conduct door-to-door focused enforcement of potential auto body shops in a CSC-identified area to ensure facilities are properly classified and to verify compliance with applicable rules and regulations	South Coast AQMD	• Identify area for targeted enforcement inspections • Number of inspections • Number of updates provided to the CSC	2023	2024
G: Rule Amendments	Initiate rule development process to amend Rules 1151 and 1171 to consider including U.S. EPA best management practices as requirements for auto body shops	South Coast AQMD	• Conduct a review of current practices and use of solvents and update CSC • Number of working group meetings held, if necessary	2023	2nd quarter, 2027
H: Auto Body Shops Incentives	• Explore incentive opportunities for low-VOC paint and coatings and water-based cleaners used at auto body shops within the community • Conduct outreach to the CSC when new funding opportunities are available to	South Coast AQMD	• Number of identified funding sources for low-VOC paint and coatings and water-based cleaners • Total incentive dollars allocated for	1st quarter, 2023	2nd quarter, 2027

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	incentivize low-VOC paint and coatings and water-based cleaners		low-VOC paint and coatings and water-based cleaners • As needed, develop and submit Assembly Bill 617 Project Plan(s)[15] • Number of incentive outreach actions completed (e.g., e-mail announcements, participation in expositions)		

[15] CARB, Community Air Protection Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives

Chapter 5d

General Industrial Facilities

Community Concerns

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) community expressed concerns about emissions from and exposure to various stationary sources that are categorized as general industrial facilities, such as pallet manufacturers, chemical manufacturing, dry cleaners, gas stations, tire manufactures, and decommissioned facilities (**Figure 5d-1**). The community also raised concerns related to potential California Environmental Quality Act (CEQA) exemptions at construction sites, such as construction of housing projects. The CSC highlighted specific locations of unknown types of industrial facilities that were of concern to them within SLA.

Figure 5d-1: SLA Air Quality Concerns from Industrial Facilities

CSC members have identified dry cleaners as a category of concern due to the adverse health effects associated with hydrocarbon solvents used in this process. One CSC-identified concern with dry cleaners is the use of perchloroethylene (PERC), a carcinogen, as a hydrocarbon solvent, which was a common solvent used for dry cleaning.[1] South Coast AQMD Rule 1421[2, 3] phased out PERC from use at dry cleaners by December 31, 2020. Additionally, the CSC is concerned with the use of Rule 1102[4] non-PERC solvent dry cleaning systems.

Regulatory Background

Based on the South Coast AQMD permitting database, there are approximately 353 general industrial facilities located within the SLA community boundary. South Coast AQMD utilizes multiple methods to classify facility types including the North American Industrial Classification Codes (NAICS), a key data source for information in this CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code),[5] to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which inspection team conducts the inspection for each facility, which is directly tied to the TS-Code. These general industrial facilities conduct a variety of processes and include facility types such as chemical operations, dry cleaners, manufacturing operations, utility, and gas stations. South Coast AQMD's Facility INformation Detail (F.I.N.D.)[6] tool allows users to search for these permitted facilities by their facility ID number, name, address, permit number, application number, or Notice to Comply or Notice of Violation number. The F.I.N.D. tool provides detailed information for each facility, including equipment lists, emissions data for facilities subject to South Coast AQMD's or CARB's reporting rules, and compliance history. These

[1] South Coast AQMD, Governing Board Meeting December 6, 2002, Agenda Item 37, http://www3.aqmd.gov/hb/2002/December/0212ag.html
[2] South Coast AQMD, Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1421.pdf
[3] South Coast AQMD, Notice to Owner/Operator of Perchloroethylene (PERC) Dry Cleaning Equipment, http://www.aqmd.gov/docs/default-source/compliance/industrial-advisories/notice-to-existing-perc-dry-cleaners-(dec-18-2020).pdf
[4] South Coast AQMD, Rule 1102 – Dry Cleaners Using Solvents Other Than PERC, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1102-dry-cleaners-using-solvent-other-than-perchloreothylene.pdf
[5] TS-Code refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4 for more information on South Coast AQMD inspection teams.
[6] South Coast AQMD, Facility INformation Detail (F.I.N.D.), http://www.aqmd.gov/nav/FIND

facilities may be subject to South Coast AQMD rules that address odors, fugitive dust, and other emissions from facilities such as Rule 402,[7] 403,[8] 1137,[9] and 1147.[10]

South Coast AQMD regularly inspects and enforces requirements at general industrial facilities. These are initiated by South Coast AQMD through routine facility inspections or prompted by outside parties through complaints, facility notifications, or agency referrals. Air pollution complaints received from the community are an important source of information. Complaints can be submitted anonymously by phone or online, but contact information is crucial to ensure that inspectors can gather all the necessary information to conduct effective investigations.

As of January 1, 2021, Rule 1421[2, 3] required all dry cleaning equipment utilizing PERC within the authoritative boundary of South Coast AQMD to be removed from service and facility owners switched to new dry cleaning systems using other compliant solvents (Rule 1102[4]) or water-based systems. CARB and South Coast AQMD conducted training to assist in the implementation of the statewide phase out of PERC. Additionally, South Coast AQMD established a financial incentive grant program which ended January 1, 2021, totaling $4.2 million, which assisted dry cleaners to make an early transition to non-PERC alternative cleaning technologies.[11] For additional details regarding regulatory efforts for general industrial facilities and a map of facilities that received funding from the dry cleaning grant, please refer to Appendix 5d: General Industrial Facilities.

Actions to Reduce Emissions or Exposure

In the process of developing this CERP, members of the CSC requested identification of all the general industrial facilities that exist in the community, with a focus on specific locations to help address emission and exposure reduction efforts. CSC members requested information regarding the type of the facilities, activities conducted, compliance history, and the emissions resulting from operations at general industrial facilities in this community. Additionally, there were requests for training and education on South Coast AQMD's F.I.N.D. tool and the process for filing air quality complaints to increase the community's involvement in addressing air quality

[7] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[8] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf
[9] South Coast AQMD, Rule 1137 – PM10 Emission Reductions from Woodworking Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1137.pdf
[10] South Coast AQMD, Rule 1147 – NOx Reductions from Miscellaneous Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1147.pdf
[11] South Coast AQMD, Financial Incentive Grant Program, http://www.aqmd.gov/home/programs/business/business-detail?title=dry-cleaner-grant

concerns. The CSC also stressed the importance of outreach and training to dry cleaners regarding community-identified alternatives and any financial and technical support to aid in the transition to these technologies.

In addition to dry cleaners, the CSC requested that information, outreach, and training be provided to assist them in increasing the community's involvement in addressing air quality concerns related to land-use issues. The CSC requested the following goals for general industrial facilities in SLA.

A. Inform the community of applicable rules and regulations, compliance history, best management practices, "Good Neighbor" practices, and available data as they relate to general industrial facilities so they may prioritize facilities of concern.
B. Identify emissions and exposure reduction measures to address prioritized concerns identified by Goal A and conduct outreach to permit applicants.
C. Enforce Rules 1102 and 1421, rule amendment to Rule 1102 for requirements for new dry cleaning machines, seek funding to support transition to community-identified zero-emission alternatives, and conduct community outreach to owners or operators regarding these alternatives.
D. Collaborate with appropriate agencies when issues are identified at general industrial facilities during inspection sweeps to ensure these facilities follow rules and regulations from appropriate agencies, in particular those related to hazardous waste handling and disposal, soil and water contamination, and land-use issues.
E. Inform the community about the F.I.N.D. tool and how to file air quality complaints.
F. Conduct air measurement surveys in priority areas to identify facilities with potential elevated emissions and to characterize these emissions.
G. Reduce emissions at construction sites.

The CSC developed the following CERP actions to address community concerns regarding the seven CERP goals. **Table 5d-1** summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from general industrial facilities in SLA.

Table 5d-1: Actions to Reduce Emissions from and Exposure to General Industrial Facilities

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Identify Facilities of Concern	• Work with the CSC to identify and prioritize general industrial facilities of concern • Inform CSC of applicable South Coast AQMD rules for the CSC-identified facilities • Inform CSC of three (3) year compliance history of the CSC-identified facilities • Collaborate with CSC to improve outreach to small businesses to encourage incorporation of best management and "Good Neighbor" practices • Summarize available emissions and/or air pollution data collected at or near CSC-identified facilities	South Coast AQMD CSC	• Provide general industrial facility prioritization list • Provide applicable rules list for identified facilities • Provide compliance history for identified facilities • Number of outreach materials distributed to small businesses • Provide emissions data, if applicable, for identified facilities	2023	2023
B: Identify Strategies	• Based on findings from Goal A, identify emissions and exposure reduction measures, if appropriate (e.g., identifying incentive opportunities, collaborating with appropriate agencies)	South Coast AQMD	• Number of emissions and exposure reduction measures • Number of equipment categories where	2023	2nd quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	• During permit application process, provide education information to the permit applicants of cleaner alternative technologies (e.g., commercially available zero-emissions technology, non-toxic alternatives)		education information is developed		
C: Dry Cleaners	• Enforcement of existing South Coast AQMD and CARB regulations (e.g., South Coast AQMD Rule 1102, South Coast AQMD Rule 1421, CARB Airborne Toxic Control Measure (ATCM) for Emissions of PERC from Dry Cleaning Operations (Dry Cleaning ATCM)) • Initiate rule development process to amend Rule 1102 to consider establishing a new emission standard reflecting zero-emission technologies for new dry cleaning systems • Identify incentive opportunities to transition to community-identified alternatives (e.g., professional wet cleaning, other zero-emission technologies) • Community outreach to owners or operators regarding alternatives, incentive opportunities, and seeking feedback from owners or operators	South Coast AQMD CSC	• Number of Rule 1102 and Rule 1421 inspections • Number of Rule Working Group meetings held • Update to CSC on rule development efforts • Provide list of incentive opportunities to support transition to community-identified alternatives, if incentive opportunities are identified • Number of outreach materials distributed to owners or operators	2023	2nd quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	regarding their willingness to transition to and/or need of support to transition to community-identified alternatives		• Number of owners or operators that provide feedback, if owners or operators are willing to disclose		
D: Agency Collaboration and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's authority during inspection sweeps at general industrial facilities (e.g., Local land-use agencies, California Division of Occupational Safety and Health (Cal/OSHA), Certified Unified Program Agencies (CUPA), public health departments)	South Coast AQMD CARB	Number of updates regarding referrals or follow-up information presented by the appropriate agency(ies) to the CSC	2nd quarter, 2022	2nd quarter, 2027
E: F.I.N.D. Tool and Filing Complaints	Conduct community outreach on F.I.N.D. tool including training on how to use the F.I.N.D. tool to search for information about South Coast AQMD-regulated facilities (e.g., facility details, equipment, permits, compliance history, etc.) and on filing air quality complaints by phone, web, or mobile application	South Coast AQMD	• Conduct one F.I.N.D. outreach session to the community • Conduct one outreach session to inform the community how to file an air quality complaint • Create user-friendly training materials for F.I.N.D. to be published on the South Coast AQMD website	4th quarter, 2022	2nd quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
F: Air Measurements Survey	Conduct initial air measurements surveys near facilities of concern (as identified under Goal A) to identify and characterize any potential emissions	South Coast AQMD	• Number of air measurements surveys • Number of updates to the CSC	2nd quarter, 2022	2nd quarter, 2027
G: Construction Sites Enforcement	Focused enforcement at construction sites of concern, as identified by the CSC, to evaluate compliance with South Coast AQMD rules (e.g., Rules 402, 403, and 1466[12], and Proposed Rule 403.2[13])	South Coast AQMD CSC	Number of enforcement updates to the CSC	4th quarter, 2022	2nd quarter, 2027

[12] South Coast AQMD, Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf?sfvrsn=25

[13] South Coast AQMD, Proposed Rule 403.2 – Fugitive Dust from Large Roadway Projects, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-403-2

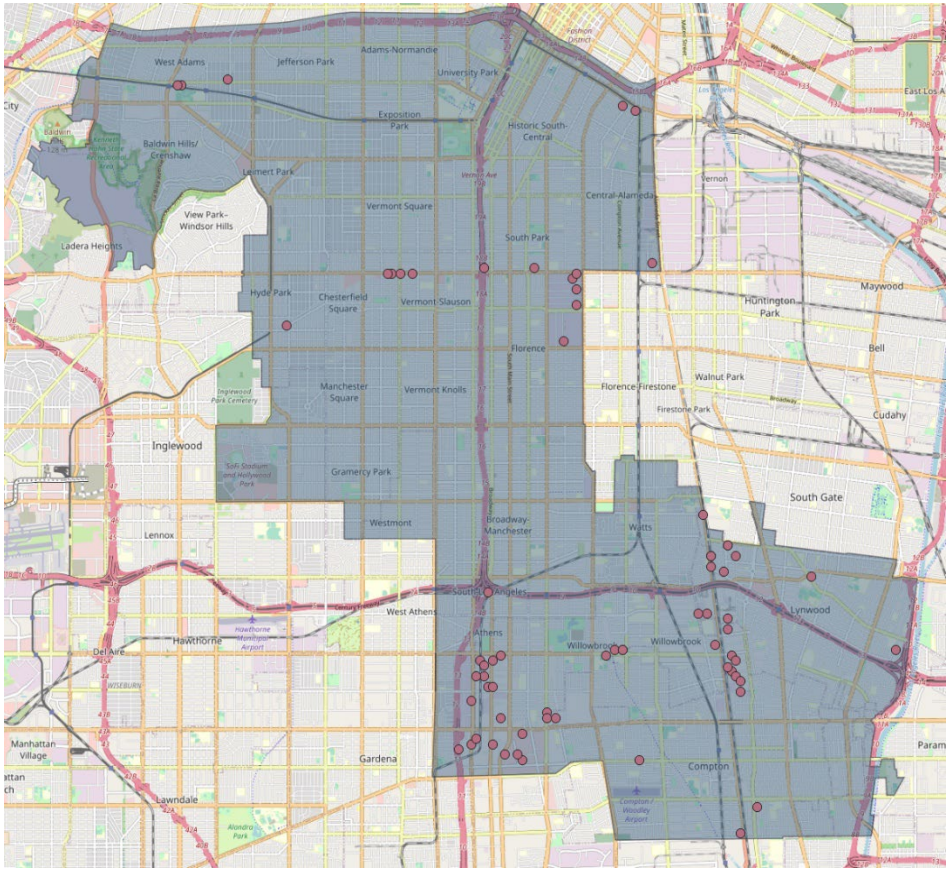
Chapter 5e

Metal Processing Facilities

Community Concerns

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC expressed concerns about health effects from emissions of criteria air pollutants, toxic air contaminants (TACs), and strong odors from metals facilities. The CSC is concerned with metal recyclers and metal scrap yards, such as Atlas Iron & Metal Co., near sensitive receptors. Lead, hexavalent chromium, nickel, and arsenic are metal TACs; a TAC is defined as an air pollutant which may cause or contribute to increase the rate of premature death or serious illness and may pose a potential risk to human health.[1]

Figure 5e-1: Metal Processing Facilities in SLA



Regulatory Background

Based on the South Coast AQMD permitting database, there are approximately 69 metal processing facilities that are permitted with South Coast Air Quality Management District (South Coast AQMD) within the SLA community boundary (**Figure 5e-1**). South Coast AQMD utilizes multiple methods to classify facility types including the North American Industrial Classification Codes (NAICS), a key data source for information in this

[1] California Health and Safety Code, Section 39655

CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code),[2] to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which inspection team conducts the inspection for each facility, which is directly tied to the TS-Code. These metal processing facilities conduct various operations, including melting, plating, finishing, machining, crushing, and grinding. Most metal recyclers and metal scrap yards do not have equipment subject to South Coast AQMD permits but could still be subject to some South Coast AQMD rules such as Rule 403.[3] These facilities may be the source of public complaints even though they do not have active permits; when such complaints are received, these locations will be investigated.

California Air Resources Board (CARB) identifies and controls TACs from a multitude of sources, informs the public of significant toxic exposures, and provides ways to reduce risks from these exposures through its Air Toxics Program. South Coast AQMD, as well as other air agencies in California, rely on the state's Office of Environmental Health Hazard Assessment (OEHHA) to identify TACs, their health effects, and the methodology to estimate the health risks from air toxic metal exposure. South Coast AQMD regulates TACs from stationary sources through several rules, including but not limited to, Rules 1401,[4] 1402,[5] 1420,[6] 1426,[7] 1430,[8] and 1469.[9] CARB also has the authority to develop rules or regulations to control TACs. For example, after hexavalent chromium was identified as a TAC,[10] CARB developed the Airborne Toxic Control Measure (ATCM) for Chromium Plating and Chromic Acid Anodizing Facilities,[11] which was adopted to reduce hexavalent chromium emissions from decorative and hard chrome plating facilities and chromic acid anodizing operations. CARB is developing an update to its ATCM, which is tentatively scheduled for approval at its Board Meeting in

[2] TS-Code refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.
[3] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf
[4] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[5] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf
[6] South Coast AQMD, Rule 1420 – Emissions Standard for Lead, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1420.pdf?sfvrsn=4
[7] South Coast AQMD, Rule 1426 – Emissions from Metal Finishing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1426.pdf
[8] South Coast AQMD, Rule 1430 – Control of Emissions from Metal Grinding Operations at Metal Forging Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1430.pdf
[9] South Coast AQMD, Rule 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf
[10] OEHHA, Chromium-hexavalent, https://oehha.ca.gov/chemicals/chromium-hexavalent
[11] CARB, Chrome Plating: Meetings & Workshops, https://ww2.arb.ca.gov/our-work/programs/air-toxics-program/chrome-plating-atcm/chrome-plating-meetings-workshops

October 2022. For additional details regarding regulatory efforts for metal processing facilities, please refer to Appendix 5e: Metal Processing Facilities.

Actions to Reduce Emissions or Exposure

In the process of developing this CERP, CSC members requested a phase out of the use of hexavalent chromium and requirements to report emissions for metals facilities not subject to South Coast AQMD's Annual Emissions Reporting (AER) program[12] or Rule 1469. Community members requested buffer zones to be established near sensitive receptors, installation of enclosures and engineering controls, and outreach to the community to inform them of best management practices. Additionally, the CSC requested more information related to community-identified metals facilities and information on applicable rules, compliance history, and air monitoring data. The CSC also requested outreach efforts to local business owners and to provide information on applicable rules and regulations, South Coast AQMD's permitting process, and the South Coast AQMD Small Business Assistance program.

The CSC requested the following goals for metal processing facilities in SLA.

A. Inform the CSC of CARB's Criteria Pollutant and Toxics Emissions Reporting (CTR) process, CARB's Chrome Plating ATCM amendment adoption, and enforce CARB's ATCM through South Coast AQMD Rule 1469.
B. Identify permitted metal processing facilities and inform the community of applicable rules and regulations, compliance history, and available data as they relate to metal processing facilities in the community.
C. Identify emissions and exposure reduction measures and strategies for metal processing facilities and assess rules for best management practices.
D. Conduct air measurements surveys to identify facilities with potential elevated emissions and to characterize these emissions.
E. Inform the CSC of metals emissions data, criteria pollutants, and TACs that may be found in the community (e.g., hexavalent chromium, lead, zinc, nitrogen oxides (NOx)).

[12] The Annual Emissions Reporting (AER) program requires facilities to report their emissions if they emit at least four tons of either sulfur oxides (Sox), volatile organic compounds (VOCs), NOx, particulate matter (PM), or emissions of 100 tons per year or more of carbon monoxide (CO) (https://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting). Facilities subject to the AB 2588 Toxic Hot Spots Program also report more detailed toxics emissions inventories every four years (http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588). CARB's new CTR regulation will require many additional metals facilities to begin reporting emissions to South Coast AQMD's AER program, phasing in from 2023 through 2029 (https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting)

F. Inform metal processing facilities of best management practices, applicable rules and regulations, South Coast AQMD's Small Business Assistance program,[13] and "Good Neighbor" practices.
G. Reduce fugitive metal emissions from metal recycling and shredding facilities by initiating rule development for Rule 1460[14] to address housekeeping and best management practices.

The CSC developed the following CERP actions to address community concerns regarding the seven CERP goals. **Table 5e-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from metal processing facilities in SLA.

Table 5e-1: Actions to Reduce Emissions from and Exposure to Metal Processing Facilities

Goals:	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
A: CARB Regulations	• Conduct a community workshop on the CTR process and share the data that has been collected from facilities in the community	CARB	• Delivery of CTR Workshop	2023	2024
	• CARB to provide information regarding CARB Chrome Plating ATCM amendments	CARB	• Number of updates to the CSC on ATCM amendments	2023	2024
	• South Coast AQMD to enforce CARB Chrome Plating ATCM through South Coast AQMD Rule 1469	South Coast AQMD	• Number of updates on Rule 1469 enforcement activities	2023	2024

[13] South Coast AQMD, Small Business Assistance, http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance
[14] South Coast AQMD, Proposed Rule 1460 – Control of Particulate Emissions from Metal Recycling and Shredding Operations, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1460

Goals:	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
B: Identify Metals Facilities	• Identify all permitted metal processing facilities within the SLA community boundary • Provide a list of South Coast AQMD rules applicable to the metals facilities identified • Provide three (3) year compliance history of the facilities identified • Summarize available emissions and air monitoring data collected at or near facilities	South Coast AQMD	• Provide list of permitted metals facilities • Provide applicable rules list for identified facilities • Provide compliance history for identified facilities • Provide emissions and air monitoring data, if available, for identified facilities	2nd quarter, 2022	2023
C: Identify Strategies	• Work with the CSC to identify and prioritize air quality concerns related to sources of metal emissions and metals facilities of concern • Based on CSC-identified facilities, identify potential strategies and approaches to address the CSC-identified concerns (e.g., incentive opportunities for businesses to incorporate best management practices) • Conduct an assessment of best management practices in South Coast AQMD metal processing rules. If rules regulating metal toxic air contaminants lack best management practices, initiate	South Coast AQMD CSC	• Provide list of prioritized concerns related to sources of metal emissions • Provide strategies list, if applicable • If strategies are found, prioritize strategies for implementation through consensus building amongst the CSC and then implement strategies • Conduct assessment of best management practices in metal processing rules	2023	2nd quarter, 2027

Goals:	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
	rulemaking to incorporate provisions for best management practices.		• Initiate rule development, if rules regulating metal particulates lack requirements for best management practices • Updates to CSC regarding results of assessment and potential rule development		
D: Air Measurement Survey	Conduct initial air measurement surveys near facilities of concern to identify and characterize any potential emissions	South Coast AQMD	• Conduct air measurements survey • Provide updates to the CSC	2nd quarter, 2022	2nd quarter, 2027
E: Emissions Data	Provide informational handout or presentation which includes an overview on criteria pollutants and toxics that may be found in the community (e.g., hexavalent chromium, lead, zinc, NOx)	South Coast AQMD	Number of handouts distributed and/or delivery of presentation	2023	2025

Goals:	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
F: Outreach to Owners or Operators	• Conduct targeted outreach to metals facility owners or operators in the community, including providing information on best management practices, South Coast AQMD's Small Business Assistance Program, permitting process, and applicable rules and regulations – with a focus on new rule requirements from CARB and South Coast AQMD • Collaborate with communities and businesses to encourage incorporation of best management and "Good Neighbor" practices	CSC South Coast AQMD CARB	• Number of outreach events or materials distributed to metals facilities • Number of updates to the CSC regarding collaboration efforts	2023	2025
G: Metal Recycling and Shredding Facilities	Initiate rule development process for Proposed Rule 1460[14] to address housekeeping and best management practices at metal recycling and shredding facilities	South Coast AQMD	Number of updates to the CSC on rule development efforts	2023	2026

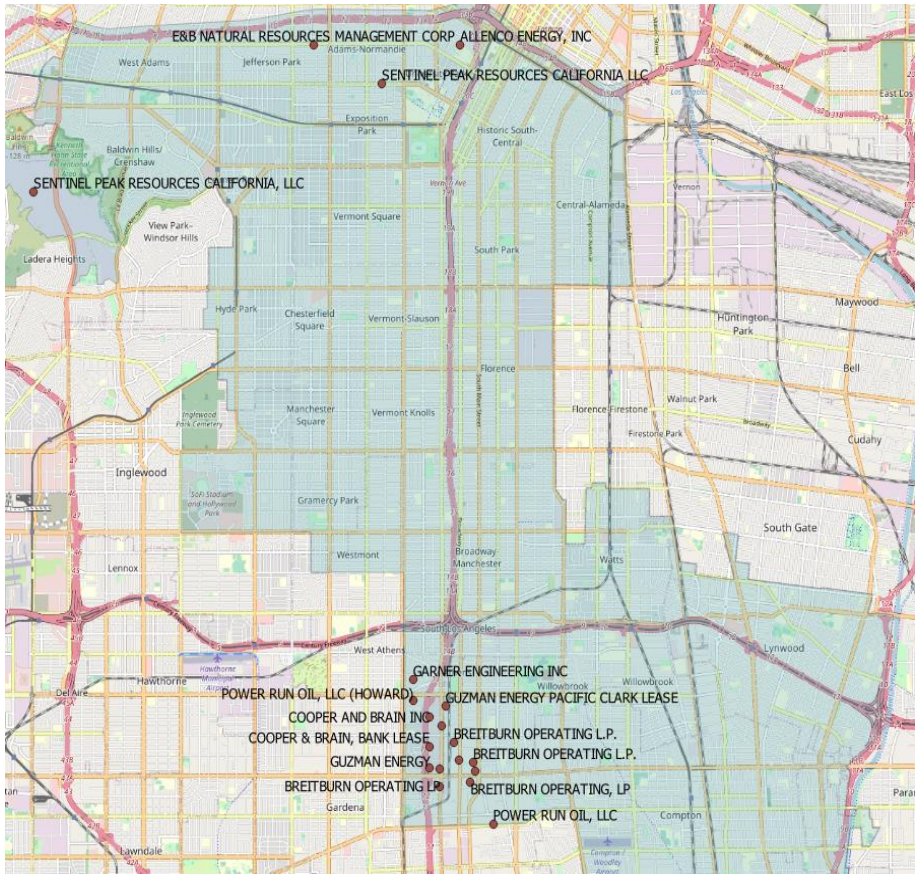
Chapter 5f

Oil and Gas Industry

Community Concerns

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC expressed concerns about emissions resulting from oil and gas operations conducted at drill sites and oil wells. In particular, the CSC expressed concerns about potential adverse health impacts associated with the proximity of these sites to residential areas. Based on the South Coast Air Quality Management District (South Coast AQMD) permitting database, there are 19 oil and gas facilities with active South Coast AQMD permits (**Figure 5f-1**). South Coast AQMD utilizes multiple methods to classify facility types including the North American Industrial Classification Codes (NAICS), a key data source for information in this CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code),[1] to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which inspection team conducts the inspection for each facility, which is directly tied to the TS-Code. The CSC identified four oil and gas facilities (i.e., Jefferson, Murphy, AllenCo Energy, Inc., and Inglewood Oil Field) where they believe there is limited transparency of monitoring data and enforcement activity findings, such as Notices of Violations (NOVs)**.** One CSC member states that

Figure 5f-1: Oil and Gas Facilities in SLA



[1] TS-Code refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

most community inquiries are relegated to Public Records Requests, which are not considered transparent. Community residents also expressed concerns about the lack of noticing and reporting for acidizing injection wells and all the chemicals used onsite which are regulated by Senate Bill 4.[2]

Regulatory Background

The oil and gas industry has existed in Southern California for over a hundred years. This industry, which includes oil wells, oil drilling, pipeline transfer stations, and oil and gas production fields, has hundreds of facilities that are subject to requirements set forth by city agencies, local air districts, and state agencies (e.g., California Air Resources Board (CARB) and the California Geologic Energy Management Division (CalGEM)).

South Coast AQMD has specific regulations for oil wells, including the Rule 1148 Series (e.g., Rules 1148.1[3] and 1148.2[4]), and other rules that reduce emissions of volatile organic compounds (VOCs)[5,6] from oil and gas operations; please refer to Appendix 5f: Oil and Gas Industry for an overview of these rules. CARB has also adopted an Oil and Gas Regulation[7] to reduce methane emissions from oil and gas production, processing, and storage. Other agencies with authority over oil and gas production have been directed to draft rules or ordinances to regulate oil and gas production operations to address public health impacts. In 2019, CalGEM was directed by Governor Gavin Newson to develop a public health rule to update public health and safety protections for communities near oil and gas production operations.[8] In 2020, the Los Angeles County Department of Regional Planning began developing an oil well ordinance to update permit requirements and development operating standards for existing and new oil wells and accessory facilities in unincorporated Los Angeles County.[9] In 2022, the Los Angeles City Council passed a motion to recommend mayoral approval to require an ordinance be developed to prohibit new oil and gas extraction, make extraction activities a nonconforming use in all zones, ensure

[2] California Legislative Information, Senate Bill No. 4, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB4
[3] South Coast AQMD, Rule 1148.1 – Oil and Gas Production Wells, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-1.pdf
[4] South Coast AQMD, Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf
[5] South Coast AQMD, Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1173.pdf
[6] South Coast AQMD, Rule 1176 – VOC Emissions from Wastewater Systems, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1176.pdf
[7] CARB, Oil and Gas Regulation, https://www.arb.ca.gov/regact/2016/oilandgas2016/oilandgas2016.htm
[8] CalGEM, Public Health Rulemaking, https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx
[9] Los Angeles County Department of Regional Planning, Oil Well Ordinance, https://planning.lacounty.gov/oilwell

plugging and abandonment of wells, and conduct comprehensive site remediation.[10] For additional details regarding regulatory efforts for the oil and gas industry, please refer to Appendix 5f.

Actions to Reduce Emissions or Exposure

During development of this CERP, the CSC expressed a desire to prioritize air measurements at specific oil drilling sites and identify areas of concern to conduct inspections in conjunction with CARB. CSC members requested transparency with monitoring and enforcement data, including periodic summaries of inspection findings including enforcement actions taken and referrals made to appropriate agencies if findings are outside South Coast AQMD's authority. The CSC has requested that regulatory agencies accept data provided by community-based organizations into their findings when conducting enforcement actions. In addition to monitoring and enforcement, the CSC requested that the current applicability of the Rule 1148 Series be assessed to include reducing emissions from on-site diesel engines, banning chemical odorants at drill sites, and removing exemptions for injection wells.

During CERP development, the CSC requested the following goals for oil and gas facilities in SLA:

A. Identify locations of concern, characterize emissions, and identify potential elevated emissions through air measurement surveys around oil drilling sites.
B. Determine which oil well sites and activities may require additional monitoring.
C. Collaborate with appropriate agencies when issues are identified at oil and gas facilities during inspection sweeps to ensure these facilities follow rules and regulations from appropriate agencies, in particular those related to land-use, public health, and abandoned wells.
D. Inform the CSC of enforcement findings and enforcement actions taken at oil and gas facilities, in particular those related to odors and fugitive emissions.
E. Reduce emissions and exposure to oil and gas operations through rule amendments to the Rule 1148 Series.
F. Support community scientists with conducting community air monitoring and understanding data.
G. Inform the CSC of enforcement findings, specifically related to CARB regulations.
H. Inform the community of other agencies' authority and their new or ongoing projects (e.g., future regulations or ordinances) related to the oil and gas industry.

[10] Los Angeles City, Council File 17-0447, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0447

I. Incentivize funding opportunities for best management practices and/or installation of emission reduction technologies at oil and gas facilities.

The CSC developed the following CERP actions to address community concerns regarding the nine CERP goals. **Table 5f-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emission or exposure reductions from the oil and gas industry in SLA.

Table 5f-1: Actions to Reduce Emissions from and Exposure to Oil and Gas Industry

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
A: Air Measurement Surveys	• Prioritize locations for community air monitoring • Conduct air measurement surveys near and around oil drilling sites to identify and characterize any potential emissions • Provide periodic summaries of monitoring results to the CSC • Provide outreach on the online tools (e.g., dashboards) available to the public to access monitoring data	South Coast AQMD	• Provide list of prioritized locations for monitoring • Number of air measurement surveys • Number of monitoring updates to the CSC • Number of outreach actions completed to provide information regarding online tools and available data	2nd quarter, 2022	4th quarter, 2026

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
B: Monitoring	Collaborate with appropriate agencies and the CSC to determine if additional air monitoring is needed during specific well activities or under certain conditions	South Coast AQMD	• Number of meetings with appropriate agencies • Conduct air measurements during specific well activities, if necessary	2nd quarter, 2022	1st quarter, 2025
C: Agency Collaborations and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during inspection sweeps at oil and gas facilities (e.g., local land-use agencies, CalGEM, and public health departments)	South Coast AQMD CARB	Number of updates regarding referrals or follow-up information presented by the appropriate agency(ies) to the CSC	2nd quarter, 2022	2nd quarter, 2027
D: Enforcement Updates	Provide periodic summaries of findings from enforcement activities, such as whether odors or emissions were confirmed or verified with complainants at a specific site or source and any enforcement action taken	South Coast AQMD	Number of enforcement updates to the CSC, including confirmation of complaints and enforcement action taken, if applicable	3rd quarter, 2022	2nd quarter, 2027
E: Rule Amendment Feasibility	Initiate rule development process to amend the Rule 1148 Series to consider: • Requirements for injection wells	South Coast AQMD	• Number of Rule Working Group meetings held, if necessary	2nd quarter, 2022	2nd quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
	• Notification of workover rig operations • Exploring feasibility of additional notifications for active acid work and chemicals used on site (e.g., odorants, chemicals for drilling activities) • Exploring limiting or eliminating use of odorants and chemicals used on site (e.g., acid work) • Notification of modifications to any previously noticed work • Exploring requirements for improved leak detection and repair (LDAR) • Exploring requirements for lower-emission or zero-emission equipment for on-site operations (e.g., assess feasibility to require cleaner engines)		• Update to CSC on rule development efforts		
F: Support Community Scientists	Identify opportunities to support community scientists to conduct community air monitoring	South Coast AQMD	Number of collaboration activities with the community scientists	2nd quarter, 2023	2nd quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
G: CARB Regulations	CARB to collaborate with South Coast AQMD to conduct inspections of all CSC-identified oil and gas facilities of concern regarding CARB and South Coast AQMD rules (including Portable Equipment Registration Program (PERP),[11] mobile source regulations, and Oil and Gas Regulation[12])	CARB South Coast AQMD	• Number of facilities inspected • Number of updates regarding findings	3rd quarter, 2022	2nd quarter, 2027
H: Other Governmental Agency Projects	Identify opportunities for other agencies to provide information on their respective oil and gas related authority (e.g., oil well status), existing and proposed rules and regulations (e.g., prohibition of new oil wells), and/or projects and programs (e.g., CalGEM drone surveillance, health impact studies)	South Coast AQMD CARB	Number of presentations presented by the appropriate agency(ies) to the CSC	3rd quarter, 2022	2nd quarter, 2027
I: Oil and Gas Industry Incentives	• Explore incentive opportunities to support implementation of best management practices, and/or installation of emission reduction technologies at oil and gas facilities • Conduct outreach to the CSC when new funding opportunities	South Coast AQMD	• Number of identified funding sources to support best management practices and/or installation of emission reduction	1st quarter, 2023	2nd quarter, 2027, if feasible

[11] CARB, Portable Equipment Registration Program (PERP), https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
[12] CARB, Oil and Gas Regulation, https://ww2.arb.ca.gov/resources/documents/oil-and-gas-regulation

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
	are available to incentivize best management practices and/or install emission reduction technologies (e.g., electrification of operations)		technologies at oil and gas facilities • Total incentive dollars allocated to support best management practices and/or installation of emission reduction technologies at oil and gas facilities • As needed, develop and submit Assembly Bill 617 Project Plan(s)[13] • Number of incentive outreach actions completed (e.g., e-mail announcements, participation in expositions)		

[13] CARB, Community Air Protection Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives

Chapter 6

Community Air Monitoring Plan (CAMP) Summary

Community Air Monitoring Plan (CAMP) Summary

The Community Air Monitoring Plan (CAMP) for the South Los Angeles (SLA) community describes the strategies and objectives for monitoring air pollution in the community and has been developed through collaboration between the Community Steering Committee (CSC), the community co-leads, and South Coast Air Quality Management District (South Coast AQMD). To support this collaboration and most effectively leverage the knowledge and experience of community members, a Monitoring Working Team (MWT) was also formed to inform and direct the CAMP and provide guidance throughout its implementation. The CSC and MWT identified the air quality priorities (Mobile Sources, Auto Body Shops, General Industrial Facilities, Metal Processing Facilities, Oil and Gas Industry) and the air monitoring actions designed to address them, as outlined in the Community Emissions Reduction Plan (CERP). Although the CERP and CAMP are separate documents, they work together to help achieve the emissions and exposure reduction actions created to improve local air quality in SLA.

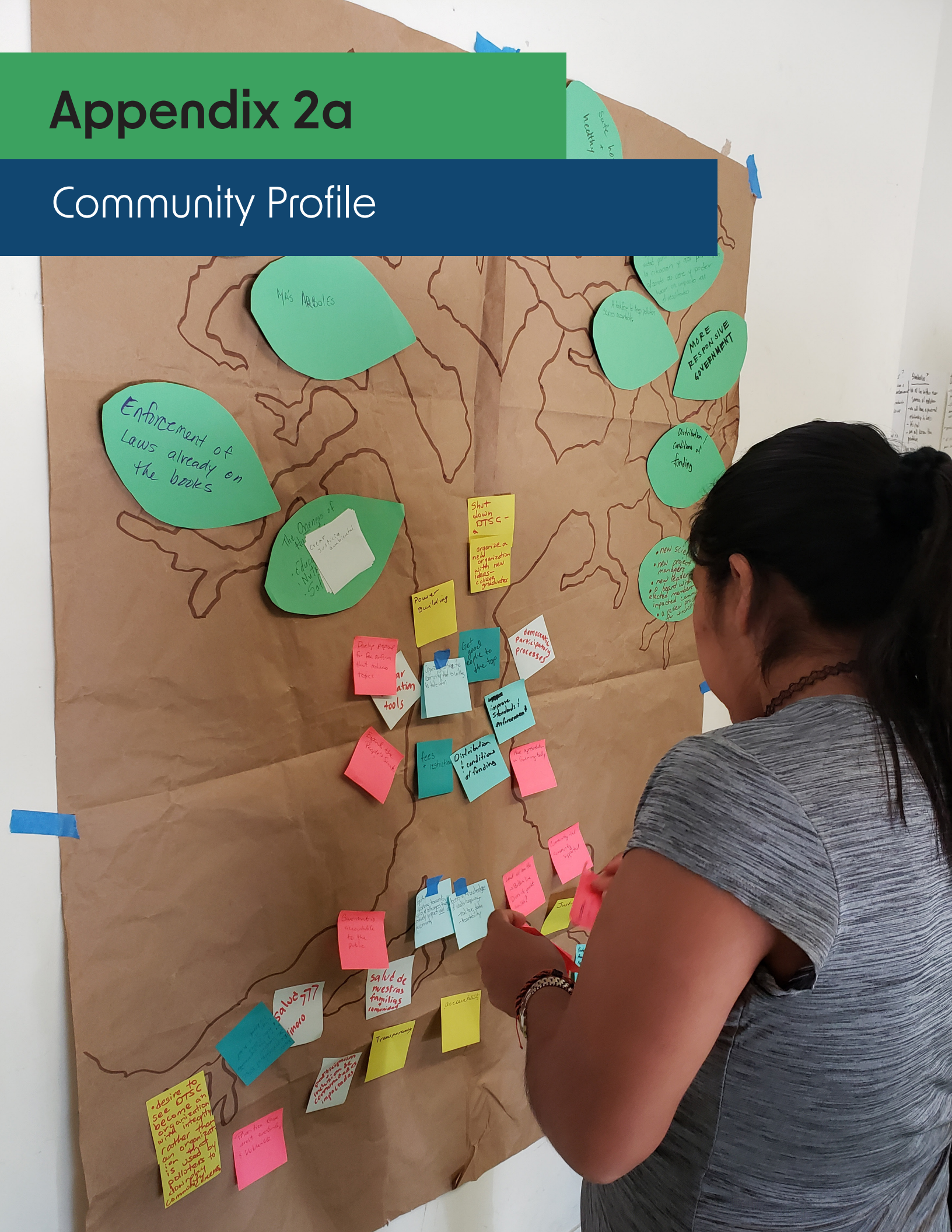
Air monitoring plays an important role in enhancing our understanding of air pollution in SLA and in other Assembly Bill 617 (AB 617) communities, and can provide valuable information about emission sources, types of air pollutants, and their potential impacts on the community. The air monitoring strategies designed to evaluate the impact of the specific air quality priorities identified by the CSC are included in the CERP actions to address Auto Body Shops (Chapter 5c), General Industrial Facilities (Chapter 5d), Metal Processing Facilities (Chapter 5e), and the Oil and Gas Industry (Chapter 5f).

To meet the specific air monitoring actions for SLA, it is critical to develop a sound air monitoring approach and to use the appropriate monitoring methods and equipment. This community covers a large, densely populated geographic area that is affected by a wide variety of air pollution sources, making it necessary to use multiple air monitoring strategies including mobile and fixed (stationary) monitoring, which can be supplemented by the use of air quality sensors. Mobile air monitoring is typically conducted using real-time instruments for wide-area measurement surveys, to help identify locations with elevated levels of specific air pollutants, and provide information about air pollution levels near a potential source. Fixed air monitoring is conducted by placing one or more measurement instruments at strategic locations to characterize emissions over time, provide real- or near real-time concentration readings of air pollutants, and to satisfy other air monitoring objectives. Additionally, air quality sensors can be deployed to supplement the overall monitoring efforts by expanding the geographical coverage of the measurements and providing real-time air pollution information for certain pollutants, such as particulate matter (PM), nitrogen dioxide (NO_2), and ozone (O_3). A detailed description of the monitoring methods and technologies that could be deployed in SLA and the air pollutants to be measured in this community is provided in the CAMP. Also described in the CAMP are the methods by which air monitoring results will be communicated to the CSC, as well as how the data will be made available to the public. The data communication plan includes quarterly monitoring updates to the CSC, posting of data to the South Coast AQMD website and in designated data portals, and written progress reports. Overall, community air monitoring will contribute to satisfy the recommendations provided in CARB's "Community Air Protection Blueprint"[1] and will support the implementation of the CERP in SLA.

[1] CARB, Community Air Protection Blueprint, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/community-air-protection-blueprint

Appendix 2a

Community Profile



Introduction

One of the requirements in California Air Resources Board's (CARB's) Community Air Protection Blueprint is a Community Emissions Reduction Plan (CERP)[1] which must include details related to the designated community, such as community attributes and public health challenges. This appendix presents data that is based on previous cumulative impact studies to describe the impact(s) of toxic air pollutants in South Los Angeles (SLA) and other environmental pollution and public health, social, and economic factors.

Public Health, Social, and Economic Data

Toxic air contaminants are one group of air pollutants that can affect public health on a local scale. A toxic air contaminant, as defined by Rule 1401,[2] is an air pollutant which may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. Toxic air contaminants are listed in Table I of Rule 1401 and include certain metal particulates (e.g., hexavalent chromium, lead, arsenic, nickel), gaseous compounds (e.g., benzene, formaldehyde, perchloroethylene), and pollutants from diesel exhaust (e.g., diesel particulate matter (DPM)).

Understanding the air pollution sources in the community, what air pollutants come from the various types of emission sources, and the community's socioeconomic profile can help provide the types of actions needed for a CERP to address community concerns and provide the greatest health benefits. The Multiple Air Toxics Exposure Study (MATES) provides regional health risks from stationary and mobile sources throughout the South Coast Air Basin and CalEnviroScreen has geographic impacts from various pollution and population factors throughout California.

Multiple Air Toxics Exposure Study

In 1997, the South Coast Air Quality Management District (South Coast AQMD) initiated the MATES study as part of its Environmental Justice Initiatives.[3] MATES uses air toxics monitoring, emissions inventories, modeling, and health risk assessment techniques to calculate the cancer risk due to selected toxic air contaminants (TAC, or "air toxics cancer risk"). Since the first MATES study, there have been four updates which generally occur every seven years. The California Office of Environmental Health Hazard Assessment (OEHHA) develops guidelines for conducting health risk assessments and the methodology for estimating cancer risks. These cancer risks are presented in chances per million. For example, if the cancer risks were estimated to be 100 per million people, the probability of an individual developing cancer due to a lifetime of exposure

[1] CARB, Community Air Protection Program Blueprint, https://ww2.arb.ca.gov/capp-blueprint
[2] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[3] South Coast AQMD, MATES II, http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-ii/mates-ii-contents-and-executive-summary.pdf

would be one hundred in a million, or one in ten thousand. In other words, this estimates an additional 100 cases of cancer in a population of a million people over a 70-year lifetime. The MATES program helps South Coast AQMD understand the overall health risks from air toxics in communities across the region. To date, South Coast AQMD has conducted five studies. The MATES V[4] Final Report was released in June 2021. MATES V includes two visualization tools that provide interactive information:

1. MATES V Data Visualization Tool[5] and
2. MATES V Monitoring Dashboard.[6]

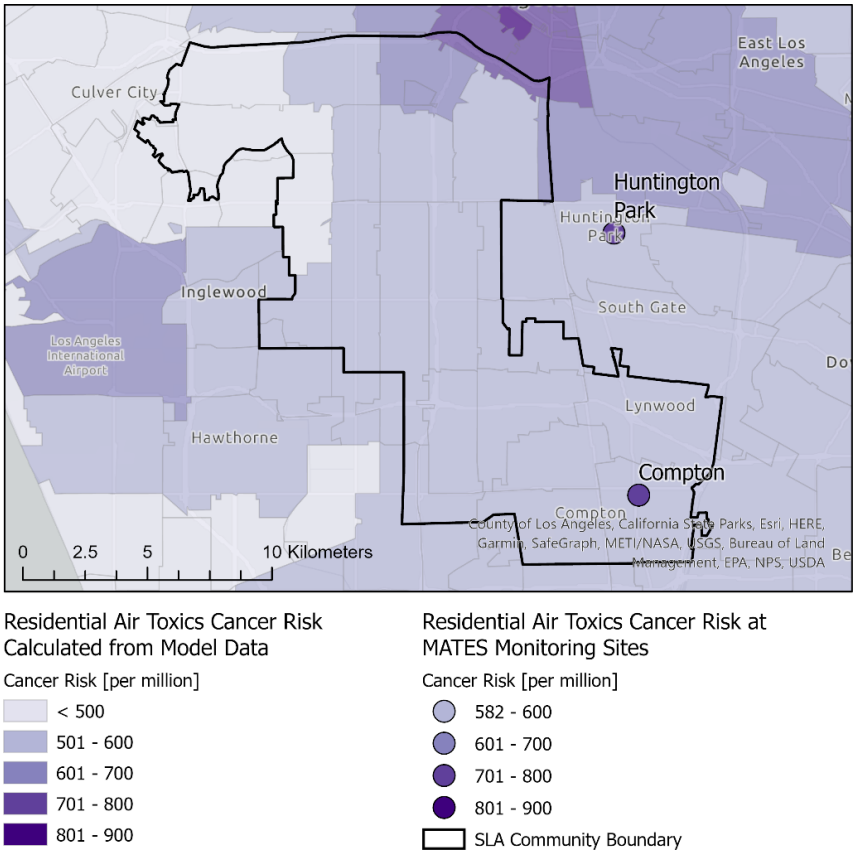
Figure A2a-1 shows air toxics cancer risk data for the South Coast Air Basin (Basin) and SLA based on MATES V data. The total average air toxics cancer risk in the SLA community is higher than the Basin-wide average, 455.8 cases in a million compared to 548 in a million. Additionally, the MATES V data shows that for both SLA and the Basin as a whole (including SLA), the air toxics risk is dominated by DPM, 66.3 percent in SLA and 67.3 percent in the Basin as a whole (including SLA).

[4] South Coast AQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

[5] South Coast AQMD, MATES V Data Visualization Tool, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38

[6] South Coast AQMD, MATES V Monitoring Dashboard, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v/mates-v-air-monitoring-dashboard

Figure A2a-1: Air Toxics Cancer Risk in SLA, Based on MATES V Data



CalEnviroScreen

CalEnviroScreen is a screening tool developed by OEHHA to identify California communities that are disproportionately vulnerable to and/or overburdened by multiple sources of pollution. For SLA's recommendation and designation in the AB 617 program, South Coast AQMD used data from CalEnviroScreen 3.0.[7] Data included in this CERP uses data from CalEnviroScreen 4.0,[8] which was released in October 2021. CalEnviroScreen 4.0 has two main categories of data:

1. pollution burden and
2. population characteristics.

Pollution burdens include exposure and environmental effects indicators and population characteristics include sensitive population and socioeconomic factor indicators.[9] Based on CalEnviroScreen, this community has public health factors, as well as social and economic factors, that make the community more vulnerable to the harmful effects of air pollution compared to

[7] OEHHA, CalEnviroScreen 3.0, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30
[8] OEHHA, CalEnviroScreen 4.0, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[9] OEHHA, CalEnviroScreen 4.0 Report, https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf

California as a whole (**Figure A2a-2** and **Figure A2a-3**). Specifically, the sensitive population indicators show that in comparison to statewide averages, this community has higher rates of emergency department visits for asthma (approximately 175 percent), cardiovascular disease (approximately 228 percent), and babies born with low birthweights (approximately 135 percent). When comparing social and economic factors to the statewide average, this community has higher rates of linguistic isolation (approximately 139 percent), poverty (approximately 151 percent), and housing burden (approximately 174 percent). Further, there are lower rates for education attainment (approximately 68 percent) and unemployment (approximately 81 percent) (**Figure A2a-4**).

Figure A2a-2: CalEnviroScreen 4.0 Map of SLA

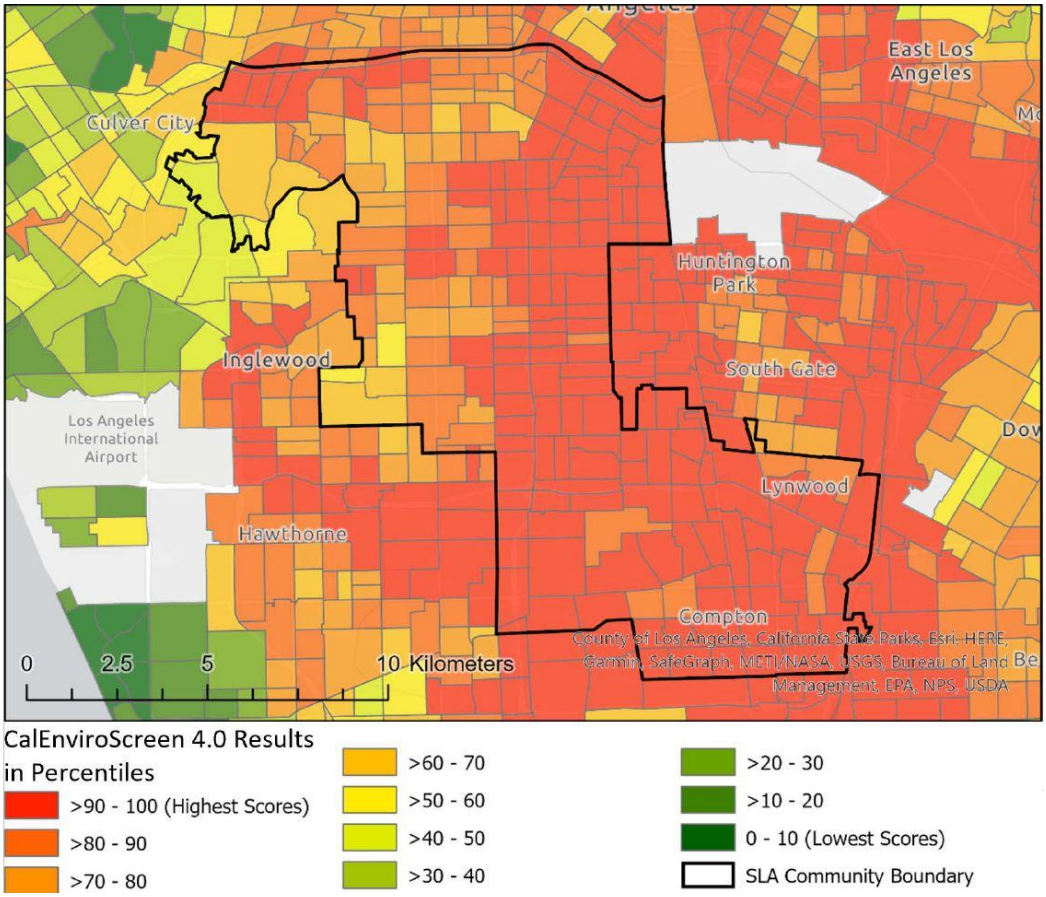


Figure A2a-3: Rates for Emergency Department Visits in SLA Compared to Statewide Averages

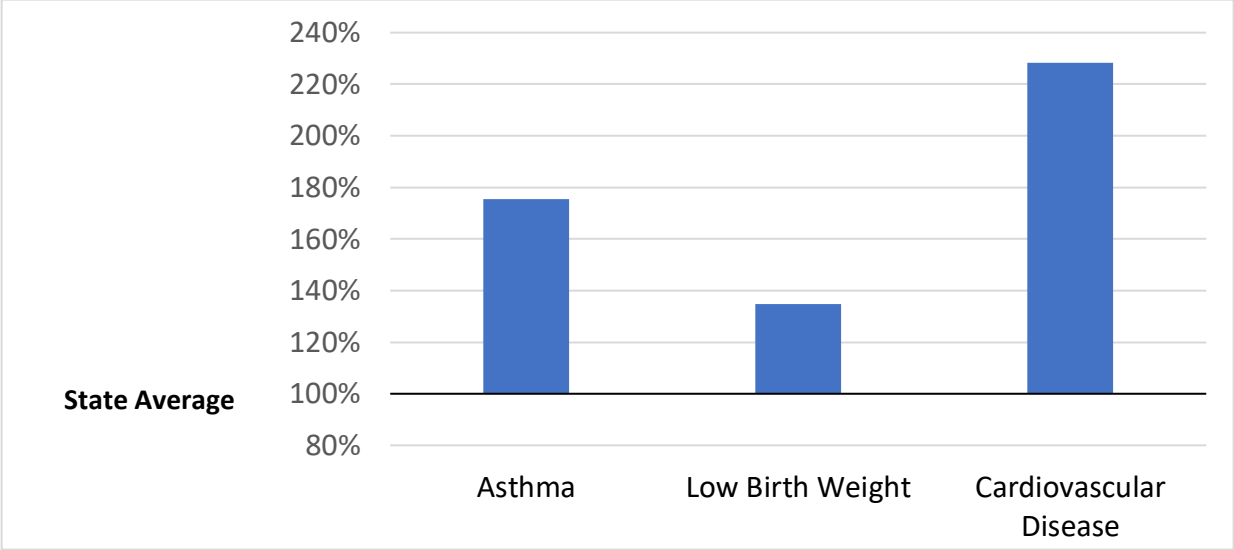
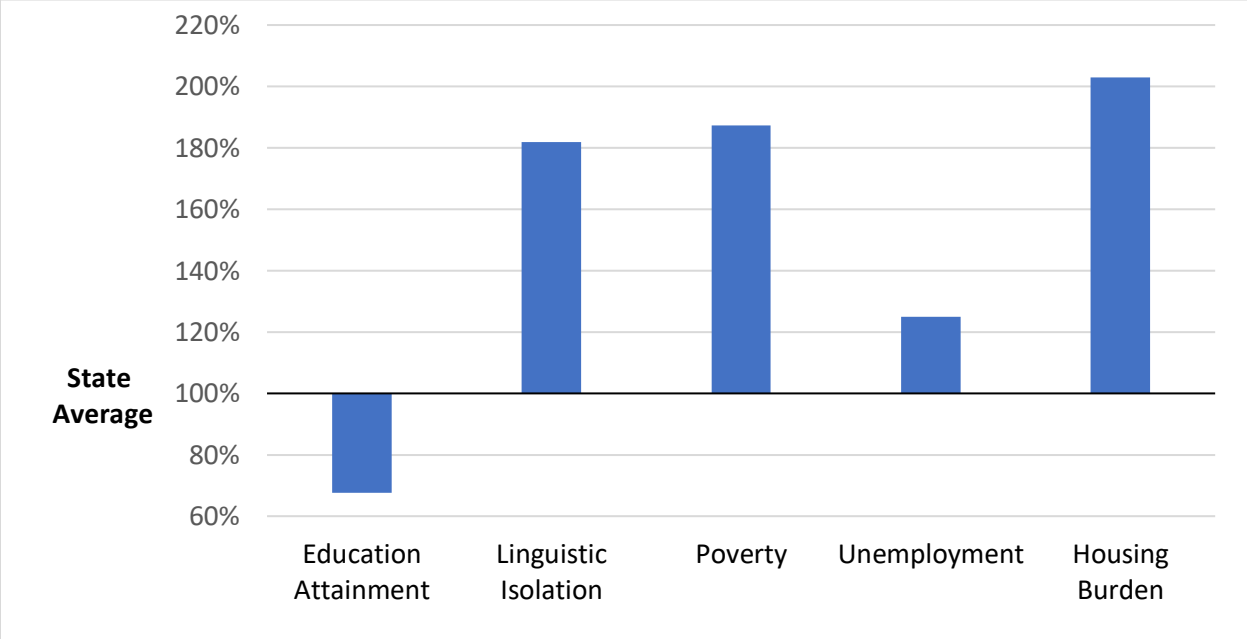


Figure A2a-4: Social and Economic Factors in SLA Compared to Statewide Averages[10, 11]



[10] The metric of Educational Attainment in CalEnviroScreen 4.0 is defined as the percent of people whose highest level of education is less than a high school education. A lower percentile score shown in the blue bar on the graph for this metric means the community has fewer people who have completed a high school education compared to the rest of the state of California.

[11] The metric of Linguistic Isolation in CalEnviroScreen 4.0 is defined as the percent of households where no one over age 14 speaks English well. A higher percentile score shown in the blue bar on the graph for this metric means there are more households that meet this definition compared to the rest of the state of California.

Key Stationary Sources of Pollution in the Community

The South Coast AQMD develops and enforces air pollution regulations to reduce emissions, improve air quality, and protect public health. Many South Coast AQMD rules apply to a specific category of equipment or processes (e.g., engines, boilers, heaters, turbines, etc.) or to a specific industry (e.g., power plants, refineries, etc.). **Table A2a-1** describes the number of facilities in this community that are subject to some key South Coast AQMD toxics rules as well as state and federal air pollution and toxic programs.

In accordance with CARB's Blueprint, facilities located within the community with Risk Reduction Plans under the Assembly Bill 2588 (AB 2588) program[12] must be identified. At South Coast AQMD, the AB 2588 program is implemented through Rule 1402.[13] **Table A2a-2**[14] shows facilities within the SLA community that are currently in South Coast AQMD's AB 2588 program and includes the facility name, address, and the most recent AB 2588 status.[15] Currently, there are no AB 2588 facilities in the SLA community boundary that require risk reduction. Facilities in the AB 2588 program without risk reduction will have its prioritization level (High, Intermediate, or Low)[11] and what year the prioritization was conducted listed as the status (prioritization is based on reporting every four years). More information about AB 2588 may be found in Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

Table A2a-1: Stationary Sources in SLA, by Regulatory Program

Rule or Program	Program Description
Rule 1407[16]	**Rule 1407** reduces emissions of arsenic, cadmium, and nickel from non-chromium melting operations.
Rule 1407.1[17]	**Rule 1407.1** reduces emissions of TACs from chromium alloy melting operations.
Rule 1420[18]	**Rule 1420** reduces emissions of lead from facilities.

[12] South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588

[13] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf

[14] Facilities designated as high priority are required to submit Health Risk Assessments to assess the risk to their surrounding community based on their air toxics emissions. Facilities ranked as Intermediate priority are required to submit a complete toxics inventory once every four years. Facilities ranked as low priority are exempt from reporting.

[15] Status as of March 2022.

[16] South Coast AQMD, Rule 1407 – Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Chromium Metal Melting Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1407.pdf

[17] South Coast AQMD, Rule 1407.1 – Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1407-1.pdf

[18] South Coast AQMD, Rule 1420 – Emissions Standard for Lead, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1420.pdf

Rule or Program	Program Description
Rule 1426[19]	**Rule 1426** reduces emissions from facilities performing metal finishing[19] operations or chromic acid anodizing.
Rule 1469[20]	**Rule 1469** reduces hexavalent chromium emissions from chromium electroplating and chromic acid anodizing operations.
Rule 1469.1[21]	**Rule 1469.1** reduces emissions of hexavalent chromium from spray coating and related operations
AB 2588[22] and Rule 1402[23]	• **AB 2588**, also known as the Air Toxics "Hot Spots" Act, is a statewide program that focuses on reducing air toxics pollution from facilities and requires facilities above certain levels to disclose and/or reduce risks. • **Rule 1402** implements the AB 2588 program.
U.S. EPA Title V[24]	The **U.S. EPA Title V program** is a federal law that requires major sources of air pollutants, and certain other sources, to: ○ Obtain an operating permit, ○ Operate in compliance with the permit, and ○ Certify at least annually their compliance with permit requirements.
Rule 1466,[16] U.S. EPA Superfund Program,[25] Department of Toxic Substance Control (DTSC) Brownfields[26]	• **Rule 1466** minimizes the amount of off-site fugitive dust emissions containing TACs by reducing particulate emissions in the ambient air as a result of earth-moving activities. • The **U.S. EPA Superfund** program conducts environmental clean-ups of some of the most contaminated land, and responds to environmental emergencies, oil spills, and natural disasters. • The **DTSC Brownfields program** conducts clean-ups of properties where the expansion, development, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

[19] South Coast AQMD Rule 1426 – Emissions from Metal Finishing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1426.pdf
[20] South Coast AQMD, Rule 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf
[21] South Coast AQMD, Rule 1469.1 – Spraying Operations Using Coatings Containing Chromium, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469-1.pdf
[22] South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588
[23] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf
[24] South Coast AQMD, Title V, http://www.aqmd.gov/home/permits/title-v
[25] U.S. EPA, Superfund, https://www.epa.gov/superfund
[26] DTSC, Latest Brownfields News, https://dtsc.ca.gov/brownfields/

Table A2a-2: Facilities in the AB 2588 Program within SLA

Facility ID	Facility Name	Facility Address	AB 2588 Program Status[12] (Prioritization Year)
2619	Martin Luther King Jr. Medical Campus	12021 S Wilmington Ave Los Angeles 90059	Intermediate (2017)
18989	Bowman Plating Co Inc.	2631 E 126th St Compton 90222	High (2018)
35302	Owens Corning Roofing and Asphalt, LLC	1501 N Tamarind Ave Compton 90222	Intermediate (2019)
134112	Robertson's Ready Mix	301 W Rosecrans Ave Gardena 90061	Intermediate (2020)
144198	Designed Metal Connections	14800 S Figueroa St Gardena 90248	Intermediate (2020)
171326	Phillips 66 Pipeline LLC	13500 S Broadway Los Angeles 90061	Intermediate (2017)
184301	Sentinel Peak Resources California, LLC	5640 S Fairfax Ave Los Angeles 90056	Intermediate (2019)
188380	Valence Surface Technologies - Lynwood	2605 Industry Way Lynwood 90262	Intermediate (2018)
195459	WG Holdings SPV, LLC	142 W Rosecrans Ave Los Angeles 90059	Intermediate (2017)
800037	Demenno-Kerdoon DBA World Oil Recycling	2000 N Alameda St Compton 90222	High (2019)
800265	University of Southern California	McClintock W 34th Childs St Los Angeles 90089	Intermediate (2020)

Best Available Retrofit Control Technologies Requirement

In 2017, the South Coast AQMD Governing Board directed South Coast AQMD to transition facilities out of the REgional CLean Air Incentives Market (RECLAIM) program to a command-and-control regulatory approach requiring Best Available Retrofit Control Technology (BARCT) as soon as practicable. Additionally, among the requirements of Assembly Bill 617 (AB 617) is an expedited schedule for implementing BARCT for facilities in the California Greenhouse Gas Cap-and-Trade program.[27] Air districts are to develop, by January 1, 2019, an expedited schedule for the implementation of BARCT no later than December 31, 2023. Descriptions of NOx RECLAIM facilities that are subject to BARCT in the SLA community boundary may be found in **Table A2a-3**. More information about the RECLAIM transition and BARCT assessments are in Chapter 5a: Introduction to Actions to Reduce Community Air Pollution and Appendix 5a.

Table A2a-3: List of NOx RECLAIM Facilities within the SLA Community

Facility ID	RECLAIM Facility Name	Facility Address	Cap-and-Trade Facility (Yes/No)[28]
800037	DEMENNO-KERDOON DBA WORLD OIL RECYCLING	2000 N ALAMEDA ST, COMPTON, CA 90222	Yes
3029	MATCHMASTER DYEING & FINISHING INC	3700 S BROADWAY, LOS ANGELES, CA 90007	Yes
35302	OWENS CORNING ROOFING AND ASPHALT, LLC	1501 N TAMARIND AVE, COMPTON, CA 90222	No

[27] CARB, Cap-and-Trade Program, https://ww2.arb.ca.gov/our-work/programs/cap-and-trade-program/about. The Cap-and-Trade Program is a key element of California's strategy to reduce greenhouse gas (GHG) emissions. The Cap-and-Trade Regulation establishes a declining limit on major sources of GHG emissions throughout California, and it creates a powerful economic incentive for significant investment in cleaner, more efficient technologies. The Cap-and-Trade Program applies to emissions that cover approximately 80 percent of the State's GHG emissions.

[28] CARB, Pollution Mapping Tool for 2019 Cap-and-Trade Facility designation, https://ww3.arb.ca.gov/ei/tools/pollution_map/

Appendix 2b

Environmental Justice Timeline as Presented by the Community Co-Leads

Disclaimer: The views and opinions expressed in Appendix 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air Quality Management District (South Coast AQMD).

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1943: The *Los Angeles Times* reported that a pall of smoke and fumes descended on downtown, cutting visibility. Striking in the midst of a heat wave, the "gas attack" was nearly unbearable. As a result, the city implemented the creation of an air pollution permit system.

1947: The **Los Angeles County Air Pollution Control District** was formed—the first such body in the nation.

1890S

1890s: At the turn of the nineteenth century, the automobile arrived in Los Angeles.

EARLY 1900S

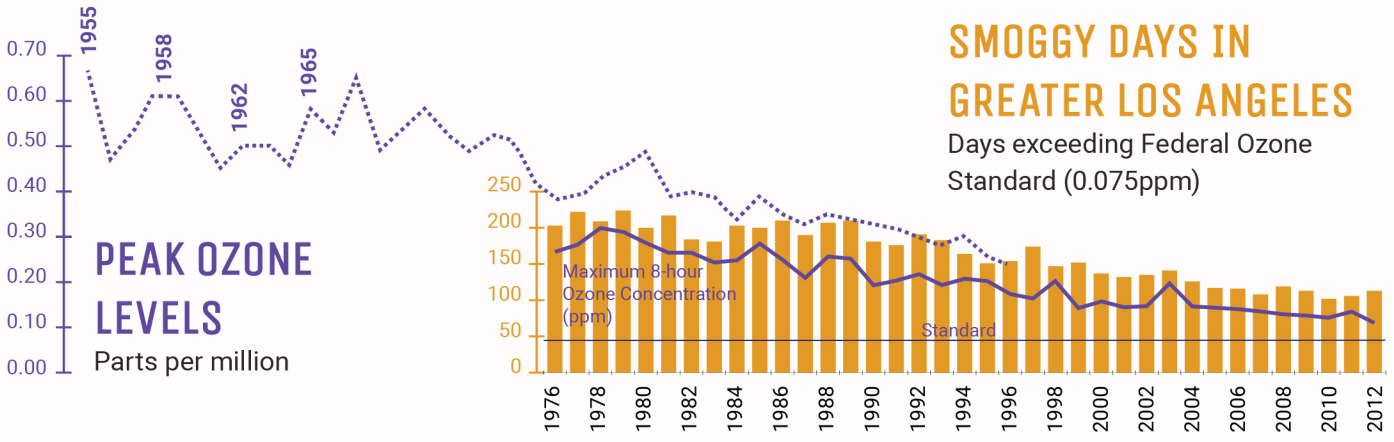
Early 20th century: Discriminatory real estate practices such as redlining cemented a pattern of exclusionary development that allowed for White home ownership in suburban neighborhoods of Los Angeles, while **concentrating industrial activity** in non-White and immigrant neighborhoods, including in and around South Central LA. During this time of rapid growth, several national firms established plants: Goodyear, Firestone, Phelps Dodge, and U.S. Steel.

1943

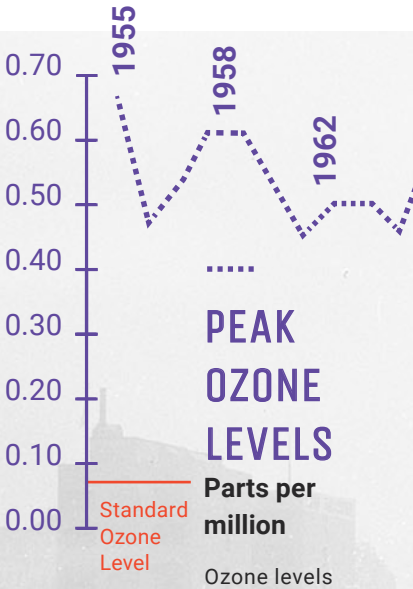
1945

1945: To address the growing challenge of smoke and fumes, Los Angeles County Board of Supervisors appointed a Smoke and Fumes Commission. Following their recommendations, the supervisors banned emissions of dense smoke and established an office of the Director of Air Pollution Control. The City of Los Angeles adopted a similar smoke regulation that same year, but the other 45 cities in the county took little or no action.

1947



1970s: A dense, visible smog hung over Los Angeles making it hard to see the mountains. This prompted the passage of the 1970s legislation at the height of the national environmental movement—the Clean Air Act. This pivotal policy required the Environmental Protection Agency (EPA) to establish standards for common and widespread pollutants, including particulate matter, ozone, sulfur dioxide, nitrogen dioxide, carbon monoxide, and lead.



1960-1980s: Middle income White populations began to leave the urban core—a phenomenon known as "white flight." Mimicking this out-migration, industries also began to leave central city communities to relocate on the peripheries of cities, leaving behind pollution and toxic contamination.

1960-1980S

1976: On July 2, 1976, Governor Jerry Brown signed Assembly Bill 250, which created the **South Coast Air Quality Management District (SCAQMD)**, which adopted rules to control man-made dust and reduce nitrogen oxides from power plants by 90%.

1967: A diverse group of California leaders came together to unify statewide efforts to address severe air pollution to create the State Air Resources Board, committing California to a unified, statewide approach to aggressively address the serious issue of air pollution in the state.

1985-1987: A community group called the Concerned Citizens of South Central LA, comprised primarily of African American women, successfully blocked the construction of a waste-to-energy incinerator (LANCER) in the heart of their neighborhood. This achievement marked a major milestone in environmental justice organizing in South Central LA. The organization is still active today.

1985-1987

1993: SCOPE, then known as Action for Grassroots Empowerment and Neighborhood Development Alternatives (AGENDA), emerged to respond to the historic disinvestment in the community and to rethink the very concept of community organizing from the ground up. SCOPE set out to build the capacity of residents through political education, leadership development and civic engagement.

2005: As an alternate member of the **California Environmental Protection Agency's Environmental Justice Advisory Committee** that oversaw the creation of Environmental Justice plans for each Cal EPA board and departments, PSR-LA and other Environmental Justice groups advanced recommendations around the implementation of precautionary approaches and the development of working definitions of cumulative impacts.

2006: Assembly Bill 32, the California Global Warming Solutions Act, was passed by the California legislature, requiring CARB to implement strategies to reduce California's greenhouse gas emission. A central measure is the Cap-and-Trade program, which sets a declining cap on emission from industries producing the highest GHGs. PSR-LA and environmental justice organizations engaged in education, organizing and advocacy efforts to ensure AB 32 is rooted in equity, does not overly focus on market-based mechanisms and actually reduces emissions at the source.

2009: A South LA immigrant mother led the fight to relocate Palace Plating, a metal finishing facility generating hazardous waste across the street from one of the largest elementary school campuses in the nation. South LA students, teachers, and families were the determining factor in forcing city government and state regulators to take action after over a decade of testing and fines resulted in little improvement.

2012: With the RePower LA Coalition, SCOPE successfully advocated for LADWP to: 1) increase its energy efficiency budget from $55 million to $128 million; 2) increase its renewable energy portfolio from 10% to 15%; and 3) adopt a set of principles for investment priorities in LADWP's energy efficiency budget.

2000 2005 2006 2007 2008 2009 2010 2012

2000: As a leading environmental health organization in Los Angeles, PSR-LA sponsored and organized the first precautionary principle conference—a seminal event which greatly influenced PSR-LA's future work and led to the introduction of the precautionary principle to Cal EPA, and a precautionary principle conference sponsored by the South Coast Air Quality Management District.

2007: **Environmental Justice organizations sue CARB over Cap-and-Trade** impacts on communities of color and low income communities.

2008: PSR-LA and SCOPE co-led the Los Angeles Apollo Alliance campaign to connect residents to healthy and sustainable green jobs.

2006 – 2008: The Greater Baldwin Alliance was convened to bring attention to the need for a Community Standards District (CSD) to counter the uncontrolled emissions of noxious gases related to oil extraction, to eliminate adverse health, safety and environmental impacts from the Baldwin Hills Oil Field. The final plan established the Community Advisory Panel (CAP). To address remaining concerns, Community Health Councils joined one of four lawsuits against Los Angeles County that resulted in an agreement to strengthen health and safety protections for households living near drilling operations.

2010: **The South LA Building Healthy Communities (South LA BHC)** initiative is launched, and aimed to build the capacity of the community to core drivers of health disparities, including environmental challenges. This collaborative successfully engaged new voices in air quality and climate policies and campaigns (including AB 32), advanced affordable housing, and advocated for health-based anti-displacement policies.

2014: PSR-LA actively promoted community driven advocacy for the South and Southeast Los Angeles community plans.

2013: South Central LA organizations engaged in the implementation of SB 375, the Sustainable Communities and Climate Protection Act, that aims to reduce statewide greenhouse gas emission through innovative transportation and land use policy.

2016: At the AllenCo oil drilling site in the South Central LA University Park neighborhood, nearby residents filed hundreds of complaints (while production at the site increased by 400%) and formed People Not Pozos as a vehicle to address the impacts of this drilling site and to sustain community pressure.

2017: **Creation of the LEAP-LA Coalition** led by PSR-LA in collaboration with Councilmember Paul Koretz, Communities for a Better Environment (CBE), SCOPE, Esperanza Community Housing, and Pacoima Beautiful. LEAP-LA seeks to transition the City of Los Angeles from being an extractive, fossil-fuel-based economy to one that is rooted in the principles of restoration, ecological balance and intersectional justice.

2019: PSR-LA led the creation of the **SCLA-PUSH initiative**.

SCLA PUSH
South Central Los Angeles Project to Understand the Sources and Health Impacts of Local Pollution

2013 2014 2016 2017 2018 2019

2013: PSR-LA, SCOPE, Communities for a Better Environment (CBE), Esperanza Community Housing, Redeemer Community Partnership, Black Women for Wellness (BWW), and Holman United Methodist Church created Standing Together Against Neighborhood Drilling-LA (STAND-LA) coalition. STAND-LA's intent is to end neighborhood oil drilling in the City of Los Angeles.

2016: With statewide coalition partners in CA Climate Equity Coalition and the California Environmental Justice Alliance, we successfully advocated to pass a set of landmark climate bills (SB 32, AB 197, AB 1550, and AB 2722) that set targets to reduce greenhouse gases by 2030; bring accountability and transparency to state climate agencies and top polluters; and address the need for targeted climate investments in communities on the frontlines of poverty and pollution.

2018: Environmental Justice organizations in South LA were instrumental in pushing CARB to change a key program rule. State agencies will now have to report on key indicators of job quality and access, including the number of workers from frontline and low-income communities who are hired and trained on Greenhouse Gas Reduction Fund (GGRF) projects, as well as wages paid and benefits provided.

2019: the LEAP-LA Coalition established the world's first Climate Emergency Mobilization Office (CEMO) at the City of Los Angeles. This office will be guided by a Climate Emergency Commission with strong Indigenous and frontline representation, in close coordination with Community Assemblies that will identify local priorities, clean production, Just Transition models, and economic justice.

Appendix 2d

Source Attribution

2019 Annual Average Criteria Air Pollutants Emissions by Source Category in South Los Angeles Community (tons/day)

CODE	Source Category	TOG	VOC	NOx	CO	SOx	TSP	PM10	PM2.5	NH3	Pb
Fuel Combustion											
10	Electric Utilities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	Cogeneration	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00
30	Oil and Gas Production (combustion)	0.01	0.00	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00
40	Petroleum Refining (Combustion)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Manufacturing and Industrial	0.16	0.03	0.33	2.06	0.08	0.02	0.05	0.05	0.09	0.01
52	Food and Agricultural Processing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60	Service and Commercial	0.10	0.06	0.34	0.64	0.01	0.03	0.03	0.03	0.12	0.01
99	Other (Fuel Combustion)	0.02	0.01	0.15	0.05	0.00	0.01	0.01	0.01	0.00	0.00
Total Fuel Combustion		**0.29**	**0.11**	**0.83**	**2.78**	**0.09**	**0.07**	**0.10**	**0.10**	**0.22**	**0.02**
Waste Disposal											
110	Sewage Treatment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
120	Landfills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
130	Incineration	0.01	0.00	0.09	0.01	0.00	0.00	0.00	0.00	0.00	0.00
140	Soil Remediation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
199	Other (Waste Disposal)	2.69	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00
Total Waste Disposal		**2.70**	**0.22**	**0.09**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.03**	**0.00**
Cleaning and Surface Coatings											
210	Laundering	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
220	Degreasing	3.13	0.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
230	Coatings and Related Processes	0.66	0.65	0.00	0.00	0.00	0.04	0.04	0.04	0.00	0.00
240	Printing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
250	Adhesives and Sealants	0.28	0.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
299	Other (Cleaning and Surface Coatings)	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cleaning and Surface Coatings		**4.18**	**1.53**	**0.00**	**0.00**	**0.00**	**0.04**	**0.04**	**0.04**	**0.00**	**0.00**
Petroleum Production and Marketing											
310	Oil and Gas Production	0.28	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
320	Petroleum Refining	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
330	Petroleum Marketing	1.82	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
399	Other (Petroleum Production and Marketing)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Petroleum Production and Marketing		**2.11**	**0.54**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Industrial Processes											
410	Chemical	0.11	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
420	Food and Agriculture	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
430	Mineral Processes	0.03	0.02	0.00	0.02	0.03	0.07	0.04	0.01	0.00	0.00
440	Metal Processes	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.00	0.00
450	Wood and Paper	0.00	0.00	0.00	0.00	0.00	0.37	0.26	0.16	0.00	0.00
460	Glass and Related Products	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
470	Electronics	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
499	Other (Industrial Processes)	0.11	0.11	0.00	0.00	0.00	0.02	0.02	0.01	0.59	0.00
Total Industrial Processes		**0.28**	**0.25**	**0.00**	**0.03**	**0.03**	**0.48**	**0.32**	**0.19**	**0.59**	**0.00**
Solvent Evaporation											
510	Consumer Products	6.79	5.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
520	Architectural Coatings and Related Solvent	0.56	0.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
530	Pesticides/Fertilizers	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
540	Asphalt Paving/Roofing	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Solvent Evaporation		**7.41**	**5.99**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

(Continued)

2019 Annual Average Criteria Air Pollutants Emissions by Source Category in South Los Angeles Community (tons/day)

CODE	Source Category	TOG	VOC	NOx	CO	SOx	TSP	PM10	PM2.5	NH3	Pb
Miscellaneous Process											
610	Residential Fuel Combustion	0.73	0.33	0.96	1.83	0.01	0.29	0.28	0.27	0.00	0.01
620	Farming Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
630	Construction and Demolition	0.00	0.00	0.00	0.00	0.00	1.04	0.51	0.05	0.00	1.12
640	Paved Road Dust	0.00	0.00	0.00	0.00	0.00	2.53	1.16	0.17	0.00	0.52
645	Unpaved Road Dust	0.00	0.00	0.00	0.00	0.00	0.10	0.06	0.01	0.00	0.01
650	Fugitive Windblown Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
660	Fires	0.02	0.01	0.00	0.16	0.00	0.02	0.02	0.02	0.00	0.00
670	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
690	Cooking	0.08	0.03	0.00	0.00	0.00	0.36	0.36	0.36	0.00	0.09
699	Other (Miscellaneous Processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.53	0.00
Total Miscellaneous Processes		**0.83**	**0.38**	**0.97**	**2.00**	**0.01**	**4.34**	**2.38**	**0.88**	**1.53**	**1.75**
On-Road Motor Vehicles											
710	Light Duty Passenger Auto (LDA)	1.25	1.14	0.89	11.73	0.03	0.48	0.47	0.20	0.32	0.08
722	Light Duty Trucks 1 (T1)	0.27	0.24	0.19	1.92	0.00	0.04	0.04	0.02	0.04	0.01
723	Light Duty Trucks 2 (T2)	0.71	0.65	0.66	6.16	0.01	0.18	0.17	0.07	0.11	0.03
724	Medium Duty Trucks (T3)	0.58	0.52	0.55	5.05	0.01	0.11	0.11	0.05	0.07	0.02
732	Light Heavy Duty Gas Trucks 1 (T4)	0.06	0.06	0.05	0.23	0.00	0.01	0.01	0.00	0.01	0.00
733	Light Heavy Duty Gas Trucks 2 (T5)	0.02	0.01	0.01	0.05	0.00	0.00	0.00	0.00	0.00	0.00
734	Medium Heavy Duty Gas Trucks (T6)	0.02	0.01	0.03	0.15	0.00	0.00	0.00	0.00	0.00	0.00
736	Heavy Heavy Duty Gas Trucks ((HHD)	0.00	0.00	0.01	0.09	0.00	0.00	0.00	0.00	0.00	0.00
742	Light Heavy Duty Diesel Trucks 1 (T4)	0.01	0.01	0.18	0.04	0.00	0.01	0.01	0.00	0.01	0.00
743	Light Heavy Duty Diesel Trucks 2 (T5)	0.00	0.00	0.08	0.02	0.00	0.00	0.00	0.00	0.00	0.00
744	Medium Heavy Duty Diesel Truck (T6)	0.04	0.03	0.68	0.12	0.00	0.05	0.05	0.03	0.03	0.00
746	Heavy Heavy Duty Diesel Trucks (HHD)	0.07	0.04	1.14	0.25	0.00	0.04	0.04	0.02	0.04	0.00
750	Motorcycles (MCY)	0.44	0.39	0.11	2.02	0.00	0.00	0.00	0.00	0.00	0.00
760	Diesel Urban Buses (UB)	0.39	0.02	0.12	2.17	0.00	0.01	0.01	0.00	0.05	0.00
762	Gas Urban Buses (UB)	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
771	Gas School Buses (SB)	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00
772	Diesel School Buses (SB)	0.00	0.00	0.12	0.01	0.00	0.01	0.01	0.00	0.00	0.00
777	Gas Other Buses (OB)	0.01	0.01	0.02	0.12	0.00	0.00	0.00	0.00	0.00	0.00
778	Motor Coaches	0.00	0.00	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00
779	Diesel Other Buses (OB)	0.01	0.01	0.11	0.02	0.00	0.01	0.01	0.00	0.00	0.00
780	Motor Homes (MH)	0.00	0.00	0.02	0.04	0.00	0.00	0.00	0.00	0.00	0.00
Total On-Road Motor Vehicles		**3.88**	**3.15**	**5.02**	**30.24**	**0.07**	**0.96**	**0.94**	**0.42**	**0.68**	**0.16**
Other Mobile Sources											
810	Aircraft	0.01	0.01	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.00
820	Trains	0.02	0.02	0.34	0.08	0.00	0.01	0.01	0.01	0.00	0.00
833	Ocean Going Vessels	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
835	Commercial Harbor Crafts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840	Recreational Boats	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
850	Off-Road Recreational Vehicles	0.02	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
860	Off-Road Equipment	2.54	2.33	1.57	33.52	0.00	0.10	0.09	0.08	0.00	0.10
861	Off-Road Equipment (PERP)	0.03	0.03	0.33	0.19	0.00	0.01	0.01	0.01	0.00	0.00
870	Farm Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
890	Fuel Storage and Handling	0.30	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Other Mobile Sources		**3.01**	**2.79**	**2.24**	**34.01**	**0.00**	**0.12**	**0.12**	**0.10**	**0.01**	**0.10**
Total Stationary and Area Sources		17.80	9.01	1.89	4.81	0.15	4.93	2.84	1.20	2.38	1.77
Total On-Road Vehicles		3.88	3.15	5.02	30.24	0.07	0.96	0.94	0.42	0.68	0.16
Total Other Mobile		3.01	2.79	2.24	34.01	0.00	0.12	0.12	0.10	0.01	0.10
Total		**24.69**	**14.96**	**9.15**	**69.06**	**0.22**	**6.01**	**3.90**	**1.73**	**3.07**	**2.03**

2019 Annual Average Toxic Air Contaminants Emissions by Source Category in South Los Angeles Community (lbs/day)

CODE	Source Category	1,3 Butadiene	Formalde-hyde	Ethylene oxide	Methylene chloride	Carbon tetrachloride	Ethylene dichloride	Perchloro-ethylene	Trichloro-ethylene	Vinyl chloride	Benzene	1,4 Dioxane	Ethylene dibromide	Arsenic	Beryllium	Cadmium	Chromium	Lead	Nickel	Asbestos	Hexavalent Chromium	Diesel PM (DPM)
Fuel Combustion																						
10	Electric Utilities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	Cogeneration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30	Oil and Gas Production (combustion)	0.03	1.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00
40	Petroleum Refining (Combustion)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Manufacturing and Industrial	0.03	48.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.60	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.04	0.00	0.00	0.00
52	Food and Agricultural Processing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60	Service and Commercial	0.09	47.62	0.00	0.01	0.00	0.00	0.00	0.00	0.00	23.23	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.02	0.00	0.00	0.00
99	Other (Fuel Combustion)	0.05	3.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Fuel Combustion		**0.20**	**101.10**	**0.00**	**0.01**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**33.55**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.10**	**0.00**	**0.00**	**0.00**
Waste Disposal																						
110	Sewage Treatment	0.00	0.00	0.00	0.47	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
120	Landfills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
130	Incineration	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
140	Soil Remediation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
199	Other (Waste Disposal)	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Waste Disposal		**0.00**	**0.01**	**0.00**	**0.47**	**0.01**	**0.00**	**0.02**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Cleaning and Surface Coatings																						
210	Laundering	0.00	0.00	0.00	0.00	0.00	0.00	132.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
220	Degreasing	0.00	0.12	0.00	627.59	0.00	0.00	9.88	1.49	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
230	Coatings and Related Processes	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00
240	Printing	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
250	Adhesives and Sealants	0.00	0.00	0.00	0.83	0.00	0.00	0.00	0.00	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
299	Other (Cleaning and Surface Coatings)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cleaning and Surface Coatings		**0.00**	**0.21**	**0.00**	**628.42**	**0.00**	**0.00**	**142.87**	**1.49**	**0.06**	**0.05**	**0.00**	**0.00**	**0.00**	**0.00**	**0.12**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Petroleum Production and Marketing																						
310	Oil and Gas Production	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
320	Petroleum Refining	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
330	Petroleum Marketing	0.14	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	4.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
399	Other (Petroleum Production and Marketing)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Petroleum Production and Marketing		**0.14**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.80**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Industrial Processes																						
410	Chemical	14.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.58	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00
420	Food and Agriculture	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
430	Mineral Processes	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.02	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
440	Metal Processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
450	Wood and Paper	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
460	Glass and Related Products	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
470	Electronics	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
499	Other (Industrial Processes)	0.00	0.00	0.00	0.78	0.00	0.00	2.64	0.30	0.00	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Industrial Processes		**14.75**	**0.00**	**0.00**	**0.98**	**0.00**	**0.00**	**2.64**	**0.30**	**0.02**	**2.89**	**0.00**	**0.00**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**
Solvent Evaporation																						
510	Consumer Products	0.00	0.27	0.00	184.29	0.00	0.00	27.08	15.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
520	Architectural Coatings and Related Solvent	0.00	0.00	0.00	2.50	0.00	0.00	0.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
530	Pesticides/Fertilizers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
540	Asphalt Paving/Roofing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Solvent Evaporation		**0.00**	**0.27**	**0.00**	**186.79**	**0.00**	**0.00**	**27.93**	**15.16**	**0.00**	**0.12**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

(Continued)

2019 Annual Average Toxic Air Contaminants Emissions by Source Category in South Los Angeles Community (lbs/day)

CODE	Source Category	1,3 Butadiene	Formalde-hyde	Ethylene oxide	Methylene chloride	Carbon tetrachloride	Ethylene dichloride	Perchloro-ethylene	Trichloro-ethylene	Vinyl chloride	Benzene	1,4 Dioxane	Ethylene dibromide	Arsenic	Beryllium	Cadmium	Chromium	Lead	Nickel	Asbestos	Hexavalent Chromium	Diesel PM (DPM)
Miscellaneous Process																						
610	Residential Fuel Combustion	0.00	70.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.12	0.00	0.00	0.00	0.00	0.00	0.07	0.01	0.13	0.00	0.00	0.00
620	Farming Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
630	Construction and Demolition	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.45	1.12	0.12	0.00	0.00	0.00
640	Paved Road Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.07	0.52	0.05	0.00	0.00	0.00
645	Unpaved Road Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
650	Fugitive Windblown Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
660	Fires	0.00	0.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
670	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
690	Cooking	0.54	8.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.43	0.00	0.00	0.00	0.00	0.00	0.01	0.09	0.02	0.00	0.00	0.00
699	Other (Miscellaneous Processes)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Miscellaneous Processes		**0.54**	**79.23**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**10.55**	**0.00**	**0.00**	**0.00**	**0.00**	**0.06**	**0.61**	**1.75**	**0.32**	**0.00**	**0.00**	**0.00**
On-Road Motor Vehicles																						
710	Light Duty Passenger Auto (LDA)	6.90	24.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	58.78	0.00	0.00	0.01	0.00	0.00	0.92	0.08	0.51	0.00	0.00	2.87
722	Light Duty Trucks 1 (T1)	1.09	4.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.96	0.00	0.00	0.00	0.00	0.00	0.08	0.01	0.04	0.00	0.00	0.34
723	Light Duty Trucks 2 (T2)	3.70	13.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33.36	0.00	0.00	0.00	0.00	0.00	0.34	0.03	0.19	0.00	0.00	0.11
724	Medium Duty Trucks (T3)	3.60	12.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28.43	0.00	0.00	0.00	0.00	0.00	0.21	0.02	0.12	0.00	0.00	0.54
732	Light Heavy Duty Gas Trucks 1 (T4)	0.15	0.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.46	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	0.00
733	Light Heavy Duty Gas Trucks 2 (T5)	0.03	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.58	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
734	Medium Heavy Duty Gas Trucks (T6)	0.07	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
736	Heavy Heavy Duty Gas Trucks ((HHD)	0.02	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
742	Light Heavy Duty Diesel Trucks 1 (T4)	0.03	2.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	3.06
743	Light Heavy Duty Diesel Trucks 2 (T5)	0.01	1.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	1.55
744	Medium Heavy Duty Diesel Truck (T6)	0.14	10.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.45	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.03	0.00	0.00	41.05
746	Heavy Heavy Duty Diesel Trucks (HHD)	0.25	19.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.61	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.02	0.00	0.00	32.04
750	Motorcycles (MCY)	3.87	15.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
760	Diesel Urban Buses (UB)	1.48	114.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15.60	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.47
762	Gas Urban Buses (UB)	0.01	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
771	Gas School Buses (SB)	0.02	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.23	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
772	Diesel School Buses (SB)	0.01	0.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	1.30
777	Gas Other Buses (OB)	0.06	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
778	Motor Coaches	0.01	0.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.10
779	Diesel Other Buses (OB)	0.02	1.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	5.84
780	Motor Homes (MH)	0.01	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.19	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.68
Total On-Road Motor Vehicles		**21.46**	**223.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**183.85**	**0.00**	**0.00**	**0.02**	**0.00**	**0.01**	**1.79**	**0.16**	**0.98**	**0.00**	**0.00**	**90.96**
Other Mobile Sources																						
810	Aircraft	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
820	Trains	0.07	5.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16.94
833	Ocean Going Vessels	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
835	Commercial Harbor Crafts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840	Recreational Boats	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
850	Off-Road Recreational Vehicles	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
860	Off-Road Equipment	27.33	141.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	123.17	0.00	0.00	0.00	0.00	0.00	0.04	0.10	0.10	0.00	0.00	92.41
861	Off-Road Equipment (PERP)	0.13	10.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25.10
870	Farm Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
890	Fuel Storage and Handling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Other Mobile Sources		**27.54**	**156.73**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**130.44**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.04**	**0.10**	**0.10**	**0.00**	**0.00**	**134.45**
Total Stationary and Area Sources		15.63	180.83	0.00	816.68	0.02	0.00	173.46	16.95	0.08	53.98	0.00	0.01	0.00	0.00	0.19	0.61	1.77	0.43	0.00	0.00	0.00
Total On-Road Vehicles		21.46	223.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	183.85	0.00	0.00	0.02	0.00	0.01	1.79	0.16	0.98	0.00	0.00	90.96
Total Other Mobile		27.54	156.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	130.44	0.00	0.00	0.00	0.00	0.00	0.04	0.10	0.10	0.00	0.00	134.45
Total		**64.64**	**560.57**	**0.00**	**816.68**	**0.02**	**0.00**	**173.46**	**16.95**	**0.08**	**368.27**	**0.00**	**0.01**	**0.02**	**0.00**	**0.20**	**2.44**	**2.03**	**1.51**	**0.00**	**0.01**	**225.42**

2026 Annual Average Criteria Air Pollutants Emissions by Source Category in South Los Angeles Community (tons/day)

CODE	Source Category	TOG	VOC	NOx	CO	SOx	TSP	PM10	PM2.5	NH3	Pb
Fuel Combustion											
10	Electric Utilities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	Cogeneration	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00
30	Oil and Gas Production (combustion)	0.01	0.00	0.01	0.03	0.00	0.00	0.00	0.00	0.00	0.00
40	Petroleum Refining (Combustion)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Manufacturing and Industrial	0.16	0.03	0.32	1.97	0.08	0.02	0.05	0.05	0.09	0.01
52	Food and Agricultural Processing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60	Service and Commercial	0.10	0.06	0.33	0.60	0.01	0.03	0.03	0.03	0.11	0.01
99	Other (Fuel Combustion)	0.02	0.01	0.13	0.04	0.00	0.01	0.01	0.01	0.00	0.00
Total Fuel Combustion		**0.29**	**0.11**	**0.80**	**2.65**	**0.09**	**0.07**	**0.10**	**0.10**	**0.21**	**0.02**
Waste Disposal											
110	Sewage Treatment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
120	Landfills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
130	Incineration	0.01	0.00	0.07	0.01	0.00	0.00	0.00	0.00	0.00	0.00
140	Soil Remediation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
199	Other (Waste Disposal)	2.72	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00
Total Waste Disposal		**2.73**	**0.22**	**0.07**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.03**	**0.00**
Cleaning and Surface Coatings											
210	Laundering	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
220	Degreasing	3.18	0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
230	Coatings and Related Processes	0.69	0.68	0.00	0.00	0.00	0.04	0.04	0.04	0.00	0.00
240	Printing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
250	Adhesives and Sealants	0.25	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
299	Other (Cleaning and Surface Coatings)	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cleaning and Surface Coatings		**4.23**	**1.55**	**0.00**	**0.00**	**0.00**	**0.04**	**0.04**	**0.04**	**0.00**	**0.00**
Petroleum Production and Marketing											
310	Oil and Gas Production	0.39	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
320	Petroleum Refining	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
330	Petroleum Marketing	1.62	0.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
399	Other (Petroleum Production and Marketing)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Petroleum Production and Marketing		**2.01**	**0.53**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Industrial Processes											
410	Chemical	0.11	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
420	Food and Agriculture	0.03	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
430	Mineral Processes	0.03	0.03	0.00	0.02	0.01	0.07	0.04	0.01	0.00	0.00
440	Metal Processes	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.00	0.00
450	Wood and Paper	0.00	0.00	0.00	0.00	0.00	0.41	0.29	0.17	0.00	0.00
460	Glass and Related Products	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
470	Electronics	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
499	Other (Industrial Processes)	0.12	0.11	0.00	0.00	0.00	0.02	0.02	0.01	0.59	0.00
Total Industrial Processes		**0.28**	**0.26**	**0.00**	**0.03**	**0.01**	**0.52**	**0.35**	**0.21**	**0.59**	**0.00**
Solvent Evaporation											
510	Consumer Products	7.25	5.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
520	Architectural Coatings and Related Solvent	0.59	0.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
530	Pesticides/Fertilizers	0.04	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
540	Asphalt Paving/Roofing	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Solvent Evaporation		**7.91**	**6.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

(Continued)

2026 Annual Average Criteria Air Pollutants Emissions by Source Category in South Los Angeles Community (tons/day)

CODE	Source Category	TOG	VOC	NOx	CO	SOx	TSP	PM10	PM2.5	NH3	Pb
Miscellaneous Process											
610	Residential Fuel Combustion	0.71	0.32	0.76	1.78	0.01	0.27	0.26	0.25	0.00	0.01
620	Farming Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
630	Construction and Demolition	0.00	0.00	0.00	0.00	0.00	1.08	0.53	0.05	0.00	1.16
640	Paved Road Dust	0.00	0.00	0.00	0.00	0.00	2.52	1.15	0.17	0.00	0.52
645	Unpaved Road Dust	0.00	0.00	0.00	0.00	0.00	0.10	0.06	0.01	0.00	0.01
650	Fugitive Windblown Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
660	Fires	0.02	0.01	0.00	0.16	0.00	0.02	0.02	0.02	0.00	0.00
670	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
690	Cooking	0.09	0.03	0.00	0.00	0.00	0.37	0.37	0.37	0.00	0.10
699	Other (Miscellaneous Processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.59	0.00
Total Miscellaneous Processes		**0.82**	**0.37**	**0.76**	**1.94**	**0.01**	**4.36**	**2.39**	**0.87**	**1.60**	**1.79**
On-Road Motor Vehicles											
710	Light Duty Passenger Auto (LDA)	0.75	0.70	0.44	7.41	0.02	0.47	0.46	0.19	0.35	0.08
722	Light Duty Trucks 1 (T1)	0.14	0.13	0.08	0.95	0.00	0.04	0.04	0.02	0.05	0.01
723	Light Duty Trucks 2 (T2)	0.48	0.45	0.30	3.94	0.01	0.18	0.18	0.07	0.13	0.03
724	Medium Duty Trucks (T3)	0.32	0.30	0.20	2.42	0.01	0.10	0.10	0.04	0.08	0.02
732	Light Heavy Duty Gas Trucks 1 (T4)	0.03	0.03	0.02	0.08	0.00	0.01	0.01	0.00	0.00	0.00
733	Light Heavy Duty Gas Trucks 2 (T5)	0.01	0.01	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00
734	Medium Heavy Duty Gas Trucks (T6)	0.01	0.01	0.01	0.07	0.00	0.00	0.00	0.00	0.00	0.00
736	Heavy Heavy Duty Gas Trucks ((HHD)	0.00	0.00	0.01	0.06	0.00	0.00	0.00	0.00	0.00	0.00
742	Light Heavy Duty Diesel Trucks 1 (T4)	0.01	0.00	0.06	0.02	0.00	0.01	0.01	0.00	0.02	0.00
743	Light Heavy Duty Diesel Trucks 2 (T5)	0.00	0.00	0.03	0.01	0.00	0.01	0.01	0.00	0.01	0.00
744	Medium Heavy Duty Diesel Truck (T6)	0.00	0.00	0.31	0.02	0.00	0.03	0.03	0.01	0.04	0.00
746	Heavy Heavy Duty Diesel Trucks (HHD)	0.04	0.01	0.69	0.23	0.00	0.03	0.03	0.01	0.05	0.00
750	Motorcycles (MCY)	0.46	0.39	0.11	2.01	0.00	0.00	0.00	0.00	0.00	0.00
760	Diesel Urban Buses (UB)	0.23	0.00	0.01	1.77	0.00	0.00	0.00	0.00	0.05	0.00
762	Gas Urban Buses (UB)	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
771	Gas School Buses (SB)	0.00	0.00	0.00	0.03	0.00	0.01	0.01	0.00	0.00	0.00
772	Diesel School Buses (SB)	0.00	0.00	0.09	0.01	0.00	0.01	0.01	0.00	0.00	0.00
777	Gas Other Buses (OB)	0.01	0.01	0.02	0.09	0.00	0.00	0.00	0.00	0.00	0.00
778	Motor Coaches	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
779	Diesel Other Buses (OB)	0.00	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.01	0.00
780	Motor Homes (MH)	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Total On-Road Motor Vehicles		**2.49**	**2.06**	**2.47**	**19.17**	**0.05**	**0.91**	**0.89**	**0.37**	**0.80**	**0.15**
Other Mobile Sources											
810	Aircraft	0.01	0.01	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.00
820	Trains	0.02	0.02	0.37	0.09	0.00	0.01	0.01	0.01	0.00	0.00
833	Ocean Going Vessels	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
835	Commercial Harbor Crafts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840	Recreational Boats	0.07	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
850	Off-Road Recreational Vehicles	0.02	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
860	Off-Road Equipment	2.50	2.29	1.32	38.02	0.00	0.08	0.07	0.06	0.00	0.09
861	Off-Road Equipment (PERP)	0.02	0.02	0.17	0.20	0.00	0.01	0.01	0.00	0.00	0.00
870	Farm Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
890	Fuel Storage and Handling	0.24	0.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Other Mobile Sources		**2.88**	**2.66**	**1.86**	**38.53**	**0.01**	**0.09**	**0.09**	**0.08**	**0.01**	**0.09**
Total Stationary and Area Sources		18.27	9.44	1.64	4.63	0.12	5.00	2.88	1.22	2.43	1.81
Total On-Road Vehicles		2.49	2.06	2.47	19.17	0.05	0.91	0.89	0.37	0.80	0.15
Total Other Mobile		2.88	2.66	1.86	38.53	0.01	0.09	0.09	0.08	0.01	0.09
Total		**23.64**	**14.16**	**5.97**	**62.33**	**0.18**	**6.00**	**3.86**	**1.67**	**3.23**	**2.05**

2026 Annual Average Toxic Air Contaminants Emissions by Source Category in South Los Angeles Community (lbs/day)

CODE	Source Category	1,3 Butadiene	Formalde-hyde	Ethylene oxide	Methylene chloride	Carbon tetrachloride	Ethylene dichloride	Perchloro-ethylene	Trichloro-ethylene	Vinyl chloride	Benzene	1,4 Dioxane	Ethylene dibromide	Arsenic	Beryllium	Cadmium	Chromium	Lead	Nickel	Asbestos	Hexavalent Chromium	Diesel PM (DPM)
Fuel Combustion																						
10	Electric Utilities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	Cogeneration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30	Oil and Gas Production (combustion)	0.04	1.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00
40	Petroleum Refining (Combustion)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Manufacturing and Industrial	0.03	47.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.45	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.04	0.00	0.00	0.00
52	Food and Agricultural Processing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60	Service and Commercial	0.10	42.09	0.00	0.01	0.01	0.00	0.00	0.00	0.00	20.40	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00
99	Other (Fuel Combustion)	0.04	2.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Fuel Combustion		**0.21**	**94.07**	**0.00**	**0.02**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**30.47**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.10**	**0.00**	**0.00**	**0.00**
Waste Disposal																						
110	Sewage Treatment	0.00	0.00	0.00	0.47	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
120	Landfills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
130	Incineration	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
140	Soil Remediation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
199	Other (Waste Disposal)	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Waste Disposal		**0.00**	**0.01**	**0.00**	**0.47**	**0.01**	**0.00**	**0.02**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Cleaning and Surface Coatings																						
210	Laundering	0.00	0.00	0.00	0.00	0.00	0.00	136.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
220	Degreasing	0.00	0.12	0.00	636.99	0.00	0.00	10.03	1.51	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
230	Coatings and Related Processes	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00
240	Printing	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
250	Adhesives and Sealants	0.00	0.00	0.00	0.75	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
299	Other (Cleaning and Surface Coatings)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cleaning and Surface Coatings		**0.00**	**0.22**	**0.00**	**637.74**	**0.00**	**0.00**	**146.86**	**1.51**	**0.06**	**0.05**	**0.00**	**0.00**	**0.00**	**0.00**	**0.12**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Petroleum Production and Marketing																						
310	Oil and Gas Production	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
320	Petroleum Refining	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
330	Petroleum Marketing	0.15	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	3.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
399	Other (Petroleum Production and Marketing)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Petroleum Production and Marketing		**0.15**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**7.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Industrial Processes																						
410	Chemical	14.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.60	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00
420	Food and Agriculture	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
430	Mineral Processes	0.00	0.00	0.00	0.22	0.00	0.00	0.00	0.00	0.02	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
440	Metal Processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
450	Wood and Paper	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
460	Glass and Related Products	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
470	Electronics	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
499	Other (Industrial Processes)	0.00	0.00	0.00	0.80	0.00	0.00	2.74	0.31	0.00	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Industrial Processes		**14.84**	**0.00**	**0.00**	**1.02**	**0.00**	**0.00**	**2.74**	**0.31**	**0.02**	**2.91**	**0.00**	**0.00**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**
Solvent Evaporation																						
510	Consumer Products	0.00	0.29	0.00	191.13	0.00	0.00	28.26	15.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
520	Architectural Coatings and Related Solvent	0.00	0.00	0.00	2.64	0.00	0.00	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
530	Pesticides/Fertilizers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
540	Asphalt Paving/Roofing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Solvent Evaporation		**0.00**	**0.29**	**0.00**	**193.78**	**0.00**	**0.00**	**29.16**	**15.93**	**0.00**	**0.13**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

(Continued)

2026 Annual Average Toxic Air Contaminants Emissions by Source Category in South Los Angeles Community (lbs/day)

CODE	Source Category	1,3 Butadiene	Formalde-hyde	Ethylene oxide	Methylene chloride	Carbon tetrachloride	Ethylene dichloride	Perchloro-ethylene	Trichloro-ethylene	Vinyl chloride	Benzene	1,4 Dioxane	Ethylene dibromide	Arsenic	Beryllium	Cadmium	Chromium	Lead	Nickel	Asbestos	Hexavalent Chromium	Diesel PM (DPM)
Miscellaneous Process																						
610	Residential Fuel Combustion	0.00	67.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.92	0.00	0.00	0.00	0.00	0.00	0.07	0.01	0.11	0.00	0.00	0.00
620	Farming Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
630	Construction and Demolition	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.47	1.16	0.12	0.00	0.00	0.00
640	Paved Road Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.07	0.52	0.05	0.00	0.00	0.00
645	Unpaved Road Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
650	Fugitive Windblown Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
660	Fires	0.00	0.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
670	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
690	Cooking	0.56	8.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.44	0.00	0.00	0.00	0.00	0.00	0.01	0.10	0.02	0.00	0.00	0.00
699	Other (Miscellaneous Processes)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Miscellaneous Processes		**0.56**	**77.07**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**9.36**	**0.00**	**0.00**	**0.00**	**0.00**	**0.06**	**0.61**	**1.79**	**0.31**	**0.00**	**0.00**	**0.00**
On-Road Motor Vehicles																						
710	Light Duty Passenger Auto (LDA)	3.54	10.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31.30	0.00	0.00	0.01	0.00	0.00	0.91	0.08	0.50	0.00	0.00	0.99
722	Light Duty Trucks 1 (T1)	0.49	1.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.60	0.00	0.00	0.00	0.00	0.00	0.08	0.01	0.04	0.00	0.00	0.13
723	Light Duty Trucks 2 (T2)	2.06	6.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.97	0.00	0.00	0.00	0.00	0.00	0.35	0.03	0.19	0.00	0.00	0.08
724	Medium Duty Trucks (T3)	1.44	4.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.41	0.00	0.00	0.00	0.00	0.00	0.20	0.02	0.11	0.00	0.00	0.35
732	Light Heavy Duty Gas Trucks 1 (T4)	0.05	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.02	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
733	Light Heavy Duty Gas Trucks 2 (T5)	0.02	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
734	Medium Heavy Duty Gas Trucks (T6)	0.04	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
736	Heavy Heavy Duty Gas Trucks ((HHD)	0.01	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
742	Light Heavy Duty Diesel Trucks 1 (T4)	0.02	1.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	1.88
743	Light Heavy Duty Diesel Trucks 2 (T5)	0.01	0.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	1.28
744	Medium Heavy Duty Diesel Truck (T6)	0.01	0.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.03	0.00	0.00	3.50
746	Heavy Heavy Duty Diesel Trucks (HHD)	0.14	10.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.46	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.02	0.00	0.00	10.50
750	Motorcycles (MCY)	3.87	16.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
760	Diesel Urban Buses (UB)	0.88	68.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.29	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.24
762	Gas Urban Buses (UB)	0.01	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
771	Gas School Buses (SB)	0.02	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
772	Diesel School Buses (SB)	0.01	0.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	0.84
777	Gas Other Buses (OB)	0.05	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.58	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
778	Motor Coaches	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.16
779	Diesel Other Buses (OB)	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.49
780	Motor Homes (MH)	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.38
Total On-Road Motor Vehicles		**12.66**	**123.78**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**111.14**	**0.00**	**0.00**	**0.02**	**0.00**	**0.00**	**1.76**	**0.15**	**0.97**	**0.00**	**0.00**	**20.81**
Other Mobile Sources																						
810	Aircraft	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
820	Trains	0.07	5.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16.81
833	Ocean Going Vessels	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
835	Commercial Harbor Crafts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840	Recreational Boats	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
850	Off-Road Recreational Vehicles	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
860	Off-Road Equipment	29.14	135.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	128.12	0.00	0.00	0.00	0.00	0.00	0.04	0.09	0.10	0.00	0.00	51.98
861	Off-Road Equipment (PERP)	0.09	6.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.25
870	Farm Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
890	Fuel Storage and Handling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Other Mobile Sources		**29.31**	**147.47**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**134.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.04**	**0.09**	**0.10**	**0.00**	**0.00**	**79.04**
Total Stationary and Area Sources		15.76	171.67	0.00	833.02	0.02	0.00	178.78	17.75	0.08	49.93	0.00	0.01	0.00	0.00	0.19	0.62	1.81	0.42	0.00	0.00	0.00
Total On-Road Vehicles		12.66	123.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	111.14	0.00	0.00	0.02	0.00	0.00	1.76	0.15	0.97	0.00	0.00	20.81
Total Other Mobile		29.31	147.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	134.00	0.00	0.00	0.00	0.00	0.00	0.04	0.09	0.10	0.00	0.00	79.04
Total		**57.73**	**442.92**	**0.00**	**833.02**	**0.02**	**0.00**	**178.78**	**17.75**	**0.08**	**295.07**	**0.00**	**0.01**	**0.02**	**0.00**	**0.20**	**2.42**	**2.05**	**1.49**	**0.00**	**0.01**	**99.85**

2031 Annual Average Criteria Air Pollutants Emissions by Source Category in South Los Angeles Community (tons/day)

CODE	Source Category	TOG	VOC	NOx	CO	SOx	TSP	PM10	PM2.5	NH3	Pb
Fuel Combustion											
10	Electric Utilities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	Cogeneration	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00
30	Oil and Gas Production (combustion)	0.01	0.00	0.01	0.03	0.00	0.00	0.00	0.00	0.00	0.00
40	Petroleum Refining (Combustion)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Manufacturing and Industrial	0.15	0.03	0.32	1.85	0.08	0.02	0.05	0.05	0.08	0.01
52	Food and Agricultural Processing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60	Service and Commercial	0.11	0.06	0.34	0.60	0.01	0.03	0.03	0.03	0.11	0.01
99	Other (Fuel Combustion)	0.02	0.01	0.13	0.04	0.00	0.01	0.01	0.01	0.00	0.00
Total Fuel Combustion		**0.28**	**0.11**	**0.81**	**2.52**	**0.09**	**0.07**	**0.10**	**0.10**	**0.20**	**0.02**
Waste Disposal											
110	Sewage Treatment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
120	Landfills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
130	Incineration	0.01	0.00	0.07	0.01	0.00	0.00	0.00	0.00	0.00	0.00
140	Soil Remediation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
199	Other (Waste Disposal)	2.76	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00
Total Waste Disposal		**2.78**	**0.23**	**0.07**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.03**	**0.00**
Cleaning and Surface Coatings											
210	Laundering	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
220	Degreasing	3.15	0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
230	Coatings and Related Processes	0.70	0.68	0.00	0.00	0.00	0.04	0.04	0.04	0.00	0.00
240	Printing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
250	Adhesives and Sealants	0.24	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
299	Other (Cleaning and Surface Coatings)	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cleaning and Surface Coatings		**4.20**	**1.55**	**0.00**	**0.00**	**0.00**	**0.04**	**0.04**	**0.04**	**0.00**	**0.00**
Petroleum Production and Marketing											
310	Oil and Gas Production	0.46	0.21	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
320	Petroleum Refining	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
330	Petroleum Marketing	1.51	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
399	Other (Petroleum Production and Marketing)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Petroleum Production and Marketing		**1.97**	**0.54**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Industrial Processes											
410	Chemical	0.11	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
420	Food and Agriculture	0.03	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
430	Mineral Processes	0.03	0.03	0.00	0.02	0.01	0.07	0.04	0.01	0.00	0.00
440	Metal Processes	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.00	0.00
450	Wood and Paper	0.00	0.00	0.00	0.00	0.00	0.42	0.30	0.18	0.00	0.00
460	Glass and Related Products	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
470	Electronics	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
499	Other (Industrial Processes)	0.12	0.12	0.00	0.00	0.00	0.02	0.02	0.01	0.59	0.00
Total Industrial Processes		**0.28**	**0.26**	**0.00**	**0.03**	**0.01**	**0.53**	**0.36**	**0.21**	**0.59**	**0.00**
Solvent Evaporation											
510	Consumer Products	7.70	6.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
520	Architectural Coatings and Related Solvent	0.61	0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
530	Pesticides/Fertilizers	0.04	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
540	Asphalt Paving/Roofing	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Solvent Evaporation		**8.37**	**6.78**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

(Continued)

2031 Annual Average Criteria Air Pollutants Emissions by Source Category in South Los Angeles Community (tons/day)

CODE	Source Category	TOG	VOC	NOx	CO	SOx	TSP	PM10	PM2.5	NH3	Pb
Miscellaneous Process											
610	Residential Fuel Combustion	0.71	0.32	0.64	1.75	0.01	0.27	0.26	0.25	0.00	0.01
620	Farming Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
630	Construction and Demolition	0.00	0.00	0.00	0.00	0.00	1.10	0.54	0.05	0.00	1.19
640	Paved Road Dust	0.00	0.00	0.00	0.00	0.00	2.51	1.15	0.17	0.00	0.51
645	Unpaved Road Dust	0.00	0.00	0.00	0.00	0.00	0.10	0.06	0.01	0.00	0.01
650	Fugitive Windblown Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
660	Fires	0.02	0.01	0.00	0.17	0.00	0.02	0.02	0.02	0.00	0.00
670	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
690	Cooking	0.09	0.03	0.00	0.00	0.00	0.38	0.38	0.38	0.00	0.10
699	Other (Miscellaneous Processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.65	0.00
Total Miscellaneous Processes		**0.81**	**0.37**	**0.65**	**1.91**	**0.01**	**4.38**	**2.40**	**0.88**	**1.66**	**1.82**
On-Road Motor Vehicles											
710	Light Duty Passenger Auto (LDA)	0.59	0.56	0.35	6.30	0.02	0.45	0.45	0.18	0.36	0.07
722	Light Duty Trucks 1 (T1)	0.09	0.09	0.05	0.68	0.00	0.04	0.04	0.02	0.05	0.01
723	Light Duty Trucks 2 (T2)	0.38	0.36	0.21	3.36	0.01	0.18	0.18	0.07	0.14	0.03
724	Medium Duty Trucks (T3)	0.24	0.23	0.13	1.90	0.01	0.10	0.10	0.04	0.08	0.02
732	Light Heavy Duty Gas Trucks 1 (T4)	0.02	0.02	0.01	0.05	0.00	0.00	0.00	0.00	0.00	0.00
733	Light Heavy Duty Gas Trucks 2 (T5)	0.01	0.01	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00
734	Medium Heavy Duty Gas Trucks (T6)	0.01	0.01	0.01	0.05	0.00	0.00	0.00	0.00	0.00	0.00
736	Heavy Heavy Duty Gas Trucks ((HHD)	0.00	0.00	0.01	0.06	0.00	0.00	0.00	0.00	0.00	0.00
742	Light Heavy Duty Diesel Trucks 1 (T4)	0.00	0.00	0.03	0.02	0.00	0.01	0.01	0.00	0.02	0.00
743	Light Heavy Duty Diesel Trucks 2 (T5)	0.00	0.00	0.02	0.01	0.00	0.01	0.01	0.00	0.01	0.00
744	Medium Heavy Duty Diesel Truck (T6)	0.00	0.00	0.29	0.02	0.00	0.03	0.03	0.01	0.04	0.00
746	Heavy Heavy Duty Diesel Trucks (HHD)	0.04	0.01	0.63	0.25	0.00	0.03	0.03	0.01	0.05	0.00
750	Motorcycles (MCY)	0.46	0.39	0.12	1.99	0.00	0.00	0.00	0.00	0.00	0.00
760	Diesel Urban Buses (UB)	0.20	0.00	0.01	1.49	0.00	0.00	0.00	0.00	0.06	0.00
762	Gas Urban Buses (UB)	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00
771	Gas School Buses (SB)	0.00	0.00	0.00	0.03	0.00	0.01	0.01	0.00	0.00	0.00
772	Diesel School Buses (SB)	0.00	0.00	0.06	0.01	0.00	0.01	0.01	0.00	0.00	0.00
777	Gas Other Buses (OB)	0.01	0.01	0.01	0.07	0.00	0.00	0.00	0.00	0.00	0.00
778	Motor Coaches	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
779	Diesel Other Buses (OB)	0.00	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.01	0.00
780	Motor Homes (MH)	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total On-Road Motor Vehicles		**2.06**	**1.71**	**2.00**	**16.34**	**0.05**	**0.89**	**0.87**	**0.36**	**0.83**	**0.14**
Other Mobile Sources											
810	Aircraft	0.01	0.01	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.00
820	Trains	0.02	0.02	0.40	0.10	0.00	0.01	0.01	0.01	0.00	0.00
833	Ocean Going Vessels	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
835	Commercial Harbor Crafts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840	Recreational Boats	0.06	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
850	Off-Road Recreational Vehicles	0.02	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
860	Off-Road Equipment	2.57	2.35	1.29	39.94	0.00	0.07	0.07	0.06	0.00	0.09
861	Off-Road Equipment (PERP)	0.02	0.02	0.14	0.22	0.00	0.00	0.00	0.00	0.00	0.00
870	Farm Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
890	Fuel Storage and Handling	0.22	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Other Mobile Sources		**2.92**	**2.70**	**1.83**	**40.49**	**0.01**	**0.09**	**0.09**	**0.07**	**0.01**	**0.09**
Total Stationary and Area Sources		18.70	9.83	1.53	4.48	0.12	5.03	2.90	1.23	2.48	1.84
Total On-Road Vehicles		2.06	1.71	2.00	16.34	0.05	0.89	0.87	0.36	0.83	0.14
Total Other Mobile		2.92	2.70	1.83	40.49	0.01	0.09	0.09	0.07	0.01	0.09
Total		**23.68**	**14.23**	**5.36**	**61.31**	**0.17**	**6.01**	**3.86**	**1.66**	**3.32**	**2.07**

2031 Annual Average Toxic Air Contaminants Emissions by Source Category in South Los Angeles Community (lbs/day)

CODE	Source Category	1,3 Butadiene	Formalde-hyde	Ethylene oxide	Methylene chloride	Carbon tetrachloride	Ethylene dichloride	Perchloro-ethylene	Trichloro-ethylene	Vinyl chloride	Benzene	1,4 Dioxane	Ethylene dibromide	Arsenic	Beryllium	Cadmium	Chromium	Lead	Nickel	Asbestos	Hexavalent Chromium	Diesel PM (DPM)
Fuel Combustion																						
10	Electric Utilities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	Cogeneration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30	Oil and Gas Production (combustion)	0.05	1.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00
40	Petroleum Refining (Combustion)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
50	Manufacturing and Industrial	0.03	46.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.23	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.04	0.00	0.00	0.00
52	Food and Agricultural Processing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60	Service and Commercial	0.10	40.75	0.00	0.01	0.01	0.00	0.00	0.00	0.00	19.65	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00
99	Other (Fuel Combustion)	0.04	2.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Fuel Combustion		**0.22**	**91.27**	**0.00**	**0.02**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**29.53**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.09**	**0.00**	**0.00**	**0.00**
Waste Disposal																						
110	Sewage Treatment	0.00	0.00	0.00	0.48	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
120	Landfills	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
130	Incineration	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
140	Soil Remediation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
199	Other (Waste Disposal)	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Waste Disposal		**0.00**	**0.01**	**0.00**	**0.48**	**0.01**	**0.00**	**0.02**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Cleaning and Surface Coatings																						
210	Laundering	0.00	0.00	0.00	0.00	0.00	0.00	139.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
220	Degreasing	0.00	0.12	0.00	630.11	0.00	0.00	9.92	1.49	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
230	Coatings and Related Processes	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00
240	Printing	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
250	Adhesives and Sealants	0.00	0.00	0.00	0.74	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
299	Other (Cleaning and Surface Coatings)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Cleaning and Surface Coatings		**0.00**	**0.23**	**0.00**	**630.85**	**0.00**	**0.00**	**149.66**	**1.49**	**0.06**	**0.05**	**0.00**	**0.00**	**0.00**	**0.00**	**0.12**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Petroleum Production and Marketing																						
310	Oil and Gas Production	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
320	Petroleum Refining	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
330	Petroleum Marketing	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
399	Other (Petroleum Production and Marketing)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Petroleum Production and Marketing		**0.15**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**7.30**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Industrial Processes																						
410	Chemical	14.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.55	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00	0.00
420	Food and Agriculture	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
430	Mineral Processes	0.00	0.00	0.00	0.22	0.00	0.00	0.00	0.00	0.02	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
440	Metal Processes	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
450	Wood and Paper	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
460	Glass and Related Products	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
470	Electronics	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
499	Other (Industrial Processes)	0.00	0.00	0.00	0.82	0.00	0.00	2.80	0.32	0.00	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Industrial Processes		**14.55**	**0.00**	**0.00**	**1.04**	**0.00**	**0.00**	**2.80**	**0.32**	**0.02**	**2.86**	**0.00**	**0.00**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**
Solvent Evaporation																						
510	Consumer Products	0.00	0.32	0.00	195.77	0.00	0.00	29.26	16.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
520	Architectural Coatings and Related Solvent	0.00	0.00	0.00	2.72	0.00	0.00	0.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
530	Pesticides/Fertilizers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
540	Asphalt Paving/Roofing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Solvent Evaporation		**0.00**	**0.32**	**0.00**	**198.49**	**0.00**	**0.00**	**30.18**	**16.52**	**0.00**	**0.13**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

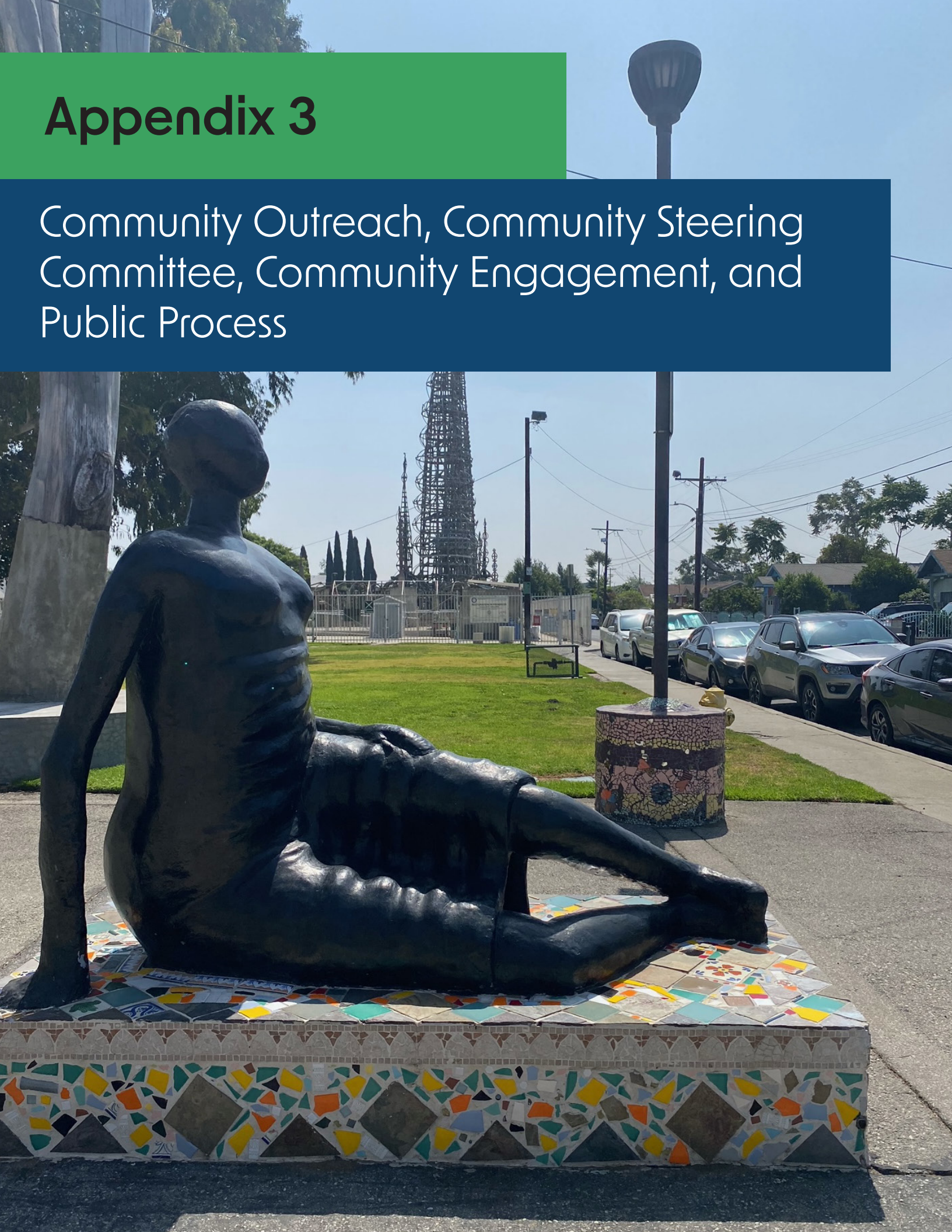
(Continued)

2031 Annual Average Toxic Air Contaminants Emissions by Source Category in South Los Angeles Community (lbs/day)

CODE	Source Category	1,3 Butadiene	Formalde-hyde	Ethylene oxide	Methylene chloride	Carbon tetrachloride	Ethylene dichloride	Perchloro-ethylene	Trichloro-ethylene	Vinyl chloride	Benzene	1,4 Dioxane	Ethylene dibromide	Arsenic	Beryllium	Cadmium	Chromium	Lead	Nickel	Asbestos	Hexavalent Chromium	Diesel PM (DPM)
Miscellaneous Process																						
610	Residential Fuel Combustion	0.00	66.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.34	0.00	0.00	0.00	0.00	0.00	0.06	0.01	0.10	0.00	0.00	0.00
620	Farming Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
630	Construction and Demolition	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.48	1.19	0.13	0.00	0.00	0.00
640	Paved Road Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.07	0.51	0.05	0.00	0.00	0.00
645	Unpaved Road Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
650	Fugitive Windblown Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
660	Fires	0.00	0.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
670	Waste Burning and Disposal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
690	Cooking	0.57	8.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.45	0.00	0.00	0.00	0.00	0.00	0.01	0.10	0.02	0.00	0.00	0.00
699	Other (Miscellaneous Processes)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Miscellaneous Processes		**0.57**	**76.11**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**8.79**	**0.00**	**0.00**	**0.00**	**0.00**	**0.06**	**0.62**	**1.82**	**0.30**	**0.00**	**0.00**	**0.00**
On-Road Motor Vehicles																						
710	Light Duty Passenger Auto (LDA)	2.50	7.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23.43	0.00	0.00	0.01	0.00	0.00	0.89	0.07	0.49	0.00	0.00	0.39
722	Light Duty Trucks 1 (T1)	0.30	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.54	0.00	0.00	0.00	0.00	0.00	0.07	0.01	0.04	0.00	0.00	0.02
723	Light Duty Trucks 2 (T2)	1.50	4.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15.24	0.00	0.00	0.00	0.00	0.00	0.35	0.03	0.19	0.00	0.00	0.07
724	Medium Duty Trucks (T3)	0.94	2.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.46	0.00	0.00	0.00	0.00	0.00	0.19	0.02	0.11	0.00	0.00	0.21
732	Light Heavy Duty Gas Trucks 1 (T4)	0.03	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.65	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
733	Light Heavy Duty Gas Trucks 2 (T5)	0.01	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
734	Medium Heavy Duty Gas Trucks (T6)	0.03	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
736	Heavy Heavy Duty Gas Trucks ((HHD)	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
742	Light Heavy Duty Diesel Trucks 1 (T4)	0.02	1.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.17	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	1.47
743	Light Heavy Duty Diesel Trucks 2 (T5)	0.01	0.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	1.23
744	Medium Heavy Duty Diesel Truck (T6)	0.01	0.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.03	0.00	0.00	3.63
746	Heavy Heavy Duty Diesel Trucks (HHD)	0.14	10.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.46	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.02	0.00	0.00	10.47
750	Motorcycles (MCY)	3.86	16.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
760	Diesel Urban Buses (UB)	0.74	57.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.82	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.16
762	Gas Urban Buses (UB)	0.01	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00
771	Gas School Buses (SB)	0.02	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.34	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	0.00
772	Diesel School Buses (SB)	0.00	0.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.01	0.00	0.00	0.50
777	Gas Other Buses (OB)	0.05	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00
778	Motor Coaches	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.16
779	Diesel Other Buses (OB)	0.00	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.53
780	Motor Homes (MH)	0.00	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.27
Total On-Road Motor Vehicles		**10.18**	**104.22**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**90.42**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**1.74**	**0.14**	**0.96**	**0.00**	**0.00**	**19.10**
Other Mobile Sources																						
810	Aircraft	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
820	Trains	0.07	5.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	17.19
833	Ocean Going Vessels	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
835	Commercial Harbor Crafts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840	Recreational Boats	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
850	Off-Road Recreational Vehicles	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
860	Off-Road Equipment	30.23	138.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	132.61	0.00	0.00	0.00	0.00	0.00	0.04	0.09	0.10	0.00	0.00	44.00
861	Off-Road Equipment (PERP)	0.09	6.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.02
870	Farm Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
890	Fuel Storage and Handling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Other Mobile Sources		**30.40**	**151.16**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**138.11**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.04**	**0.09**	**0.10**	**0.00**	**0.00**	**68.21**
Total Stationary and Area Sources		15.49	167.93	0.00	830.88	0.02	0.00	182.67	18.33	0.08	48.67	0.00	0.01	0.00	0.00	0.19	0.62	1.84	0.41	0.00	0.00	0.00
Total On-Road Vehicles		10.18	104.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	90.42	0.00	0.00	0.01	0.00	0.00	1.74	0.14	0.96	0.00	0.00	19.10
Total Other Mobile		30.40	151.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	138.11	0.00	0.00	0.00	0.00	0.00	0.04	0.09	0.10	0.00	0.00	68.21
Total		**56.07**	**423.32**	**0.00**	**830.88**	**0.02**	**0.00**	**182.67**	**18.33**	**0.08**	**277.20**	**0.00**	**0.01**	**0.01**	**0.00**	**0.20**	**2.40**	**2.07**	**1.47**	**0.00**	**0.01**	**87.31**

Appendix 3

Community Outreach, Community Steering Committee, Community Engagement, and Public Process

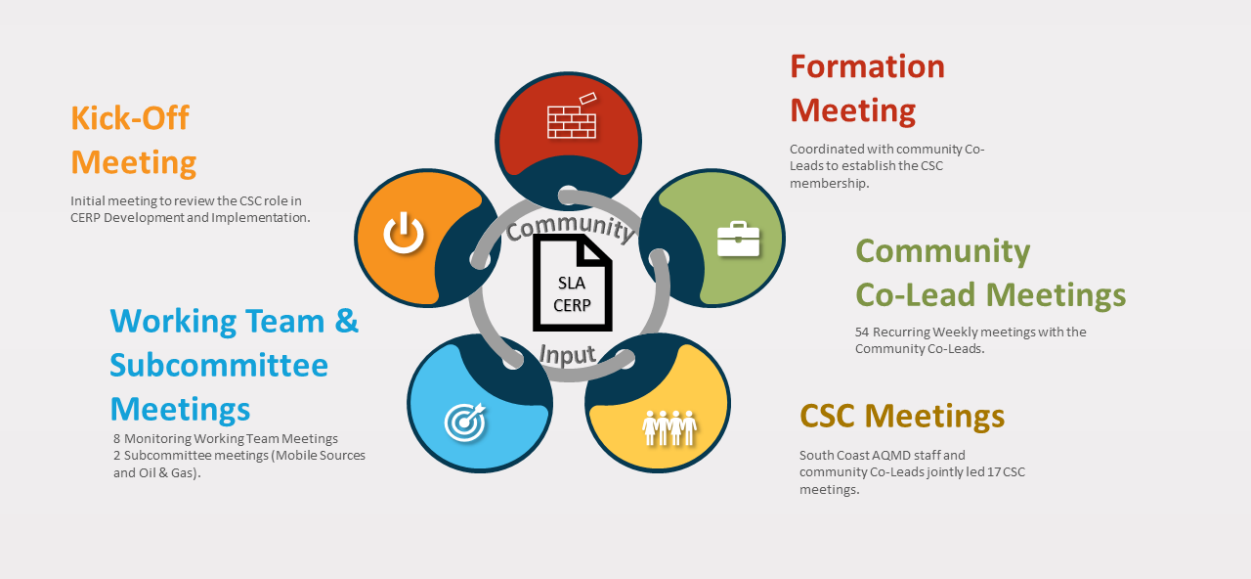


Introduction

Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process includes an overview of the public engagement process with the Community Steering Committee (CSC).

Key features of the community input for CERP development include partnering with community co-leads, kick-off and CSC formation meetings, weekly co-lead meetings, working team meetings, and hosting monthly CSC meetings. **Figure A3-1** provides information on the types and number of meetings that took place during the development phase of the Community Emissions Reduction Plan (CERP) for the South Los Angeles (SLA) community.

Figure A3-1: Community Input for CERP Development



Input from the community co-leads that were part of the CSC as well as the public, were integral in the development of the Community Emissions Reduction Plan (CERP) for SLA. There were two unique features of the SLA public process:

1. The SLA community was the first community that the South Coast AQMD worked with community co-leads; and
2. the SLA community was the first community where all meetings were held virtually due to the COVID-19 pandemic.

Working in a virtual format allowed South Coast Air Quality Management District (AQMD) to continue working with the community on the CERP. However, the community co-leads commented, and South Coast AQMD agrees that in-person interactions would have allowed the opportunity to connect with community co-leads, CSC, and the public in ways that only in-person interactions allow. Working with the community co-leads presented different challenges that were new to South Coast AQMD, that required patience and understanding from all entities. Through the process, South Coast AQMD had meetings with the community co-leads (**Table A3-1**), which provided the opportunity to better understand the perspective of community concerns and to have deeper discussions of issues to ensure measures in the CERP to reflect community concerns.

Table A3-1: SLA CSC Co-Lead Meeting Schedule

Meeting Number	Community Co-Lead Meeting Type, Date, and Location
1	SLA Community Co-Lead Meeting February 11, 2021 **Virtual Zoom Webinar**
2	SLA Community Co-Lead Leadership Meeting March 26, 2021 **Virtual Zoom Webinar**
3	SLA Community Co-Lead Leadership Meeting March 30, 2021 **Virtual Zoom Webinar**
4	SLA Community Co-Lead Meeting CSC Selection Discussion April 15, 2021 **Virtual Zoom Webinar**
5	SLA Community Co-Lead Meeting April 29, 2021 **Virtual Zoom Webinar**
6	SLA Community Co-Lead Meeting April 30, 2021 **Virtual Zoom Webinar**
7	SLA Community Co-Lead Meeting May 6, 2021 **Virtual Zoom Webinar**
8	SLA Community Co-Lead Meeting May 13, 2021 **Virtual Zoom Webinar**
9	SLA Community Co-Lead Meeting May 20, 2021 **Virtual Zoom Webinar**

Meeting Number	Community Co-Lead Meeting Type, Date, and Location
10	SLA Community Co-Lead Meeting May 27, 2021 **Virtual Zoom Webinar**
11	SLA Community Co-Lead Meeting June 3, 2021 **Virtual Zoom Webinar**
12	SLA Community Co-Lead Meeting June 10, 2021 **Virtual Zoom Webinar**
13	SLA Community Co-Lead Meeting June 17, 2021 **Virtual Zoom Webinar**
14	SLA Community Co-Lead Meeting June 24, 2021 **Virtual Zoom Webinar**
15	SLA Community Co-Lead Meeting July 1, 2021 **Virtual Zoom Webinar**
16	SLA Community Co-Lead Meeting July 8, 2021 **Virtual Zoom Webinar**
17	SLA Community Co-Lead Meeting July 15, 2021 **Virtual Zoom Webinar**
18	SLA Community Co-Lead Meeting July 22, 2021 **Virtual Zoom Webinar**
19	SLA Community Co-Lead Meeting July 28, 2021 **Virtual Zoom Webinar**
20	SLA Community Co-Lead Meeting August 4, 2021 **Virtual Zoom Webinar**
21	SLA Community Co-Lead Meeting August 11, 2021 **Virtual Zoom Webinar**
22	SLA Community Co-Lead Meeting August 13, 2021 **Virtual Zoom Webinar**
23	SLA Community Co-Lead Meeting August 25, 2021

Meeting Number	Community Co-Lead Meeting Type, Date, and Location
	Virtual Zoom Webinar
24	SLA Community Co-Lead Meeting Facilitator Review August 31, 2021 **Virtual Zoom Webinar**
25	SLA Community Co-Lead Meeting Facilitator Review September 1, 2021 **Virtual Zoom Webinar**
26	SLA Community Co-Lead Meeting Facilitator Review September 3, 2021 **Virtual Zoom Webinar**
27	SLA Community Co-Lead Meeting Facilitator Onboarding September 10, 2021 **Virtual Zoom Webinar**
28	SLA Community Co-Lead Meeting September 30, 2021 **Virtual Zoom Webinar**
29	SLA Community Co-Lead Meeting October 5, 2021 **Virtual Zoom Webinar**
30	SLA Community Co-Lead Meeting October 13, 2021 **Virtual Zoom Webinar**
31	SLA Community Co-Lead Meeting October 20, 2021 **Virtual Zoom Webinar**
32	SLA Community Co-Lead Meeting October 27, 2021 **Virtual Zoom Webinar**
33	SLA Community Co-Lead Meeting November 3, 2021 **Virtual Zoom Webinar**
34	SLA Community Co-Lead Meeting November 10, 2021 **Virtual Zoom Webinar**
35	SLA Community Co-Lead Meeting November 17, 2021 **Virtual Zoom Webinar**

Meeting Number	Community Co-Lead Meeting Type, Date, and Location
36	SLA Community Co-Lead Meeting December 1, 2021 **Virtual Zoom Webinar**
37	SLA Community Co-Lead Meeting December 8, 2021 **Virtual Zoom Webinar**
38	SLA Community Co-Lead Meeting January 5, 2022 **Virtual Zoom Webinar**
39	SLA Community Co-Lead Meeting January 12, 2022 **Virtual Zoom Webinar**
40	SLA Community Co-Lead Meeting January 19, 2022 **Virtual Zoom Webinar**
41	SLA Community Co-Lead Meeting January 26, 2022 **Virtual Zoom Webinar**
42	SLA Community Co-Lead Meeting February 2, 2022 **Virtual Zoom Webinar**
43	SLA Community Co-Lead Meeting February 9, 2022 **Virtual Zoom Webinar**
44	SLA Community Co-Lead Meeting February 16, 2022 **Virtual Zoom Webinar**
45	SLA Community Co-Lead Meeting February 23, 2022 **Virtual Zoom Webinar**
46	SLA Community Co-Lead Meeting March 2, 2022 **Virtual Zoom Webinar**
47	SLA Community Co-Lead Meeting March 9, 2022 **Virtual Zoom Webinar**
48	SLA Community Co-Lead Meeting March 16, 2022 **Virtual Zoom Webinar**
49	SLA Community Co-Lead Meeting March 23, 2022

Meeting Number	Community Co-Lead Meeting Type, Date, and Location
	Virtual Zoom Webinar
50	SLA Community Co-Lead Meeting March 23, 2022 **Virtual Zoom Webinar**
51	SLA Community Co-Lead Meeting March 23, 2022 **Virtual Zoom Webinar**
52	SLA Community Co-Lead Draft CERP Comments Meeting March 29, 2022 **Virtual Zoom Webinar**
53	SLA Community Co-Lead Draft CERP Comments Meeting April 5, 2022 **Virtual Zoom Webinar**
54	SLA Community Co-Lead Meeting April 6, 2022 **Virtual Zoom Webinar**

This appendix contains additional information on committee documents, meeting materials, and additional community engagement.[1]

Information regarding the Monitoring Working Team (MWT) and MWT meetings can be found in the Community Air Monitoring Plan (CAMP). **Table A3-2** outlines the CSC meeting schedule for SLA.

Table A3-2: CSC Meeting Schedule

Meeting Number	Date and Location	Approximate Number of Attendees
Kick-Off	First Community Kick-Off Meeting January 14, 2021 **Virtual Zoom Webinar**	90
1	CSC Formation Meeting March 11, 2021 **Virtual Zoom Webinar**	65
2	CSC Meeting April 1, 2021 **Virtual Zoom Webinar**	75

[1] South Coast AQMD, AB 617 – 2020-Designated Communities, http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la

Meeting Number	Date and Location	Approximate Number of Attendees
3	CSC Meeting May 6, 2021 **Virtual Zoom Webinar**	65
4	CSC Meeting June 3, 2021 **Virtual Zoom Webinar**	60
5	CSC Meeting July 22, 2021 **Virtual Zoom Webinar**	50
6	CSC Meeting August 5, 2021 **Virtual Zoom Webinar**	45
7	CSC Meeting September 2, 2021 **Virtual Zoom Webinar**	55
8	Mobile Sources Subcommittee Meeting September 14, 2021 **Virtual Zoom Webinar**	40
9	Oil & Gas Subcommittee Meeting September 30, 2021 **Virtual Zoom Webinar**	40
10	CSC Meeting October 7, 2021 **Virtual Zoom Webinar**	35
11	CSC Meeting November 16, 2021 **Virtual Zoom Webinar**	40
12	CSC Meeting December 2, 2021 **Virtual Zoom Webinar**	35
13	CSC Meeting January 13, 2022 **Virtual Zoom Webinar**	50
14	CSC Meeting February 3, 2022 **Virtual Zoom Webinar**	70
15	CERP Workshop and CSC Meeting March 3, 2022 **Virtual Zoom Webinar**	80
16	CSC Meeting	75

Meeting Number	Date and Location	Approximate Number of Attendees
	April 7, 2022 **Virtual Zoom Webinar**	
17	CSC Meeting May 5, 2022 **Virtual Zoom Webinar**	75

Roster

The SLA CSC membership initially consisted of 48 CSC primary members, along with various organizations' designated alternates. As of January 16, 2022, the roster was updated to reflect the 46 remaining CSC members (**Table A3-3**).

Table A3-3: CSC Roster for SLA

Affiliation	Primary CSC Member	Alternate
Active Resident	Ana Cobarrubias	
Active Resident	Angelica Urquidez	
Active Resident	Blanca Lucio	
Active Resident	Brenda Beltran	
Active Resident	Caroline Orija	
Active Resident	Debbie Exum	
Active Resident	Ebony R. Williams	
Active Resident	Elba Lilian Pleitez	
Active Resident	Fatima Iqbal-Zubair	
Active Resident	Guadalupe Rivas	
Active Resident	Ignacio Gutierrez	
Active Resident	Iretha Warmsley	
Active Resident	Kate Vavra-Musser	
Active Resident	Lillie Jackson	
Active Resident	Lourdes Huerta	
Active Resident	Manuel Hernandez	
Active Resident	Margaret Peters	
Active Resident	Marion Williams	
Active Resident	Norma Linares	
Active Resident	Patricia Jones	
Active Resident	Patricia Strong-Fargas	
Active Resident	Richard Parks	
Active Resident	Ron R. Chevalier	
Active Resident	Sophia "Storm" Hopkins	

Affiliation	Primary CSC Member	Alternate
Active Resident	Stephanie Ayala	
Active Resident	Timothy McDaniel	
Agency, School, University, Hospital	**Primary CSC Member**	**Alternate**
City of Los Angeles Office of Petroleum and Natural Gas	Erica Blyther	
Los Angeles County Department of Public Health	Mandi Bane	
University of Southern California	Yoshira Ornelas Van Horne	Jill Johnson
Business, Business Organization or Labor Organization	**Primary CSC Member**	**Alternate**
Aqua Wet Clean	Hans Kim	
California Metal-X	Tim Strelitz	
Community Organizations	**Primary CSC Member**	**Alternate**
South Los Angeles Transit Empowerment Zone	April Sandifer	
Brotherhood Crusade	Bryce Marie Bakewell	
Los Angeles Brotherhood Crusade	Curtis Silvers	
Esperanza Community Housing	Gabriela Gonzalez	
Esperanza Community Housing	Hugo Garcia	
SCOPE	Joaquin Meneses	
Community Repower Movement	Mac Shorty	
Watts Summer Festival, Inc/Watts 365.	Pamela Garrett	
South Los Angeles Transit Empowerment Zone	Paul Pulido	
Wattskanda	Sarah Zahra Bejaune	
Community Co-Leads	**Primary CSC Member**	**Alternate**
Strategic Concepts in Organizing and Policy Education (SCOPE)	Gina Charusombat	
Watts Clean Air and Energy Committee (WCAEC)	Jacquelyn Badejo	
Watts Clean Air and Energy Committee (WCAEC)	Linda Cleveland	
Physicians for Social Responsibility-Los Angeles (PSR-LA)	Martha Dina Arguello	
Physicians for Social Responsibility-Los Angeles (PSR-LA)	Paula Torrado Plazas	

Agendas

Prior to every CSC meeting, the meeting agenda was emailed to CSC members and interested parties as well as posted online in English and Spanish.[2]

Meeting Dates, Times, and Locations

Recent and upcoming activities regarding the SLA community, including an interactive map, the preliminary draft of the CERP and CAMP, meeting invitations, presentations, materials, and summary notes are posted online.[1]

Links to meeting flyers, presentations, and meeting summaries are listed in **Table A3-4** below. Additionally, **Table A3-5** lists CSC input received at community meetings, organized by meeting date, and includes a general overview of how the CSC member comment may have been incorporated into this CERP.

Table A3-4: Community Meeting Information

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
Kick-Off Meeting	First Community Meeting January 14, 2021 **Virtual Zoom Webinar**	90	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/kick-off-meeting-flyer-2021-english-and-spanish.pdf?sfvrsn=8	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-jan14-2021.pdf?sfvrsn=8	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/meeting-presentation-january-14-2021.pdf?sfvrsn=8
1	CSC Formation Meeting March 11, 2021 **Virtual Zoom Webinar**	65	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-mar11-2021.pdf?sfvrsn=20	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-mar11-2021.pdf?sfvrsn=8	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-mar11-2021.pdf?sfvrsn=9
2	CSC Meeting April 1, 2021	75	English/Spanish: http://www.aqmd.gov/docs/defau	English/Spanish: http://www.aqmd.gov/docs/defau	English: http://www.aqmd.gov/docs/defau

[2] South Coast AQMD, AB 617 – 2020-Designated Communities, Meeting Agendas, http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
	Virtual Zoom Webinar		lt-source/ab-617-ab-134/steering-committees/south-la/flyer-apr1-2021.pdf?sfvrsn=12	lt-source/ab-617-ab-134/steering-committees/south-la/agenda-apr1-2021.pdf?sfvrsn=8	lt-source/ab-617-ab-134/steering-committees/south-la/presentation-apr1-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-apr1-2021.pdf?sfvrsn=8
3	CSC Meeting May 6, 2021 **Virtual Zoom Webinar**	65	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-may6-2021.pdf?sfvrsn=14	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-may6-2021.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-may6-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-may6-2021.pdf?sfvrsn=8
4	CSC Meeting June 3, 2021 **Virtual Zoom Webinar**	60	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-june3-	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
			2021.pdf?sfvrsn=8	june3-2021.pdf?sfvrsn=8	la/presentation-june3-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-june3-2021.pdf?sfvrsn=8
5	CSC Meeting July 22, 2021 **Virtual Zoom Webinar**	50	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-july15-2021.pdf?sfvrsn=26	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/meeting-agenda-july-15-2021.pdf?sfvrsn=14	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/sla-july-csc-07222021-english.pdf?sfvrsn=9 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/sla-july-csc-07222021-spanish.pdf?sfvrsn=8
6	CSC Meeting August 5, 2021 **Virtual Zoom Webinar**	45	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-aug5-2021.pdf?sfvrsn=8	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-aug5-2021.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-aug5-2021.pdf?sfvrsn=6 Spanish:

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
					http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-aug5-2021.pdf?sfvrsn=6
7	CSC Meeting September 2, 2021 **Virtual Zoom Webinar**	55	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-sept2-2021.pdf?sfvrsn=8	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-sept2-2021.pdf?sfvrsn=6	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sept2-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/meeting-presentation---sept-2-2021---spanish.pdf?sfvrsn=8
8	Mobile Sources Subcommittee Meeting September 14, 2021 **Virtual Zoom Webinar**	40	N/A	N/A	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/slides-sept14-2021.pdf?sfvrsn=6
9	Oil & Gas Subcommittee Meeting September 30, 2021	40	N/A	N/A	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/sout

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
	Virtual Zoom Webinar				h-la/slides-sept30-2021.pdf?sfvrsn=6
10	CSC Meeting October 7, 2021 **Virtual Zoom Webinar**	35	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-oct7-2021.pdf?sfvrsn=6	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-oct7-2021.pdf?sfvrsn=12	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-oct7-2021.pdf?sfvrsn=6 Spanish: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-oct7-2021.pdf?sfvrsn=8
11	CSC Meeting November 16, 2021 **Virtual Zoom Webinar**	40	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-nov16-2021.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-nov16-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-spanish-nov16-2021.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-nov16-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-nov-16-

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
					2021.pdf?sfvrsn=8
12	CSC Meeting December 2, 2021 **Virtual Zoom Webinar**	35	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-dec2-2021.pdf?sfvrsn=8	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-dec2-2021.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-dec2-2021.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-dec2-2021.pdf?sfvrsn=9
13	CSC Meeting January 13, 2022 **Virtual Zoom Webinar**	50	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-jan13-2022.pdf?sfvrsn=12	English: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/meeting-agenda---jan-13-2022.pdf?sfvrsn=9 Spanish: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-spanish-jan13-2022.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-jan13-2022.pdf?sfvrsn=9 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-jan13-2022.pdf?sfvrsn=8
14	CSC Meeting	70	English/Spanish:	English:	English:

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
	February 3, 2022 **Virtual Zoom Webinar**		http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-feb3-2022.pdf?sfvrsn=8	http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/meeting-agenda---feb-3-2022.pdf?sfvrsn=8 Spanish: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-sp-feb3-2022.pdf?sfvrsn=8	http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-feb3-2022.pdf?sfvrsn=14 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-feb3-2022.pdf?sfvrsn=14
15	CERP Workshop and CSC Meeting March 3, 2022 **Virtual Zoom Webinar**	80	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-mar3-2022.pdf?sfvrsn=8444	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-mar3-2022.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-sp-mar3-2022.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-mar3-2022.pdf?sfvrsn=14 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-mar3-2022.pdf?sfvrsn=14
16	CSC Meeting April 7, 2022 **Virtual Zoom Webinar**	75	English/Spanish: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/sout	English: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/sout	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-

Meeting Number	Meeting Type/ Date and Location	Approximate Number of Attendees	Meeting Flyer Invitation	Meeting Agendas	Presentation Links
			h-la/meeting-flyer-april-7-2022.pdf?sfvrsn=6	h-la/ab617-sla-csc-meeting-agenda-for-4-7-22.pdf?sfvrsn=4 Spanish: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/ab617-sla-csc-meeting-agenda-for-4-7-22-spanish.pdf?sfvrsn=4	la/presentation-apr7-2022.pdf?sfvrsn=15 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-apr7-2022.pdf?sfvrsn=15
17	CSC Meeting May 5, 2022 **Virtual Zoom Webinar**	75	English/Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/flyer-may5-2022.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-may5-2022.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/agenda-sp-may5-2022.pdf?sfvrsn=8	English: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-may5-2022.pdf?sfvrsn=8 Spanish: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/presentation-sp-may5-2022.pdf?sfvrsn=8

Table A3-5: Summary of Community Meetings

Community Meeting	Discussion Topic(s)	CSC Input	How was CSC input used in the CERP development process?
March 2021	• Overview of Program Development Processes CAMP and CERP • History of Environmental Justice in SLA • Community members were invited to fill out forms to express their interest in becoming a CSC member	• Discussed criteria for CSC representation • Discussed community boundary and locations and facilities of concern that should be included within the boundary	• Criteria was used to help select CSC members • Feedback on air quality concerns were considered for the SLA community boundary and air quality priorities
April 2021	• Community boundary • Introduction of community co-leads to community members	• Discussed air quality concerns related to land-use decisions, autobody shops, oil and gas operations, warehouses, goods movement, and California Environmental Quality Act (CEQA)	• Feedback on air quality concerns were considered for the SLA community boundary and air quality priorities • Boundary was used to define focus area for CERP actions
May 2021	• Community boundary • Sources and Health Impacts of Local-Air Pollution (SCLA-PUSH)	• Discussed air quality concerns related to oil and gas operations, water and soil contamination, auto body shops, dry cleaners, mobile sources, and lack of green space	• Feedback on air quality concerns were considered for the SLA community boundary and air quality priorities • Boundary was used to define focus area for CERP actions
June 2021	• Draft Charter • Overview of Community Air Quality Concerns	• Discussed Draft Charter and provided input on criteria for CSC	• Feedback on air quality concerns helped identify air quality priorities and actions needing to

Community Meeting	Discussion Topic(s)	CSC Input	How was CSC input used in the CERP development process?
	• CAMP and CERP Development • Environmental Justice and Racism in Los Angeles • PSR-LA Land Use Tool • Clean Up Green Program	member representation • Provided feedback regarding example air quality priorities and development timelines • Discussed community-based organization efforts and tools as well as community pollution impacts to identify major sources of pollution	be addressed and included in the Preliminary Draft CERP
July 2021	• Draft Charter • Air Quality Concerns • Stipend Process	• Discussed concerns with general industrial facilities, mobile sources, auto body shops, the oil and gas industry, and toxics	• Feedback on air quality concerns helped identify air quality priorities and actions needing to be addressed and included in the Preliminary Draft CERP
August 2021	• Charter Finalization • Air Quality Concerns • Finalization of Air Quality Priorities • Overview of Potential CERP Strategies • Poll for Interest in Subcommittees	• Community co-lead activity to gather details about air quality concerns, particularly stationary sources of pollution • Discussed methodology for emissions inventory, resources for CERP implementation, permitting and enforcement, air monitoring, and fence line	• Finalized Charter and air quality priorities. • Feedback on air quality concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP

Community Meeting	Discussion Topic(s)	CSC Input	How was CSC input used in the CERP development process?
		monitoring for oil drilling sites	
September 2021	• Upcoming Truck Incentives Workshop • Overview of CAMP and CERP Development Process	• Discussed truck incentives outreach and funding, and expressed monitoring data concerns related to low-cost sensors and complaints • Discussed resources for CAMP implementation and public grant writing sessions	• Feedback on air quality concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP
Mobile Source Subcommittee Meeting *(September 14, 2021)*	• Mobile Source Authority • CARB's Truck Enforcement in SLA • Overview of Mobile Source Air Quality Concerns • Example Mobile Source Actions and Community Monitoring	• CSC members provided testimonials about impacts of mobile sources on the community	• Feedback on mobile source concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP
Oil and Gas Subcommittee Meeting *(September 30, 2021)*	• Oil and Gas Authority • Overview of South Coast AQMD Regulations • Overview of Oil and Gas Air Quality Concerns • Community Testimonial • Example Oil and Gas Actions and Community Monitoring	• CSC members provided a testimonial about requested topics to be addressed through the CERP • Community co-leads led discussion regarding community concerns related to the oil and gas industry	• Feedback on oil and gas concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP

Community Meeting	Discussion Topic(s)	CSC Input	How was CSC input used in the CERP development process?
October 2021	• Emissions Inventory • Industrial Facilities	• Discussed concerns with emission sources close to sensitive receptors, unpermitted small businesses, recycling centers, construction sites, and accuracy of self-reported emissions • CSC requested increased outreach and education, community health impact studies, and monitoring efforts	• Feedback on air quality concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP
November 2021	• Air quality concerns and priorities	• Community co-leads led discussion on no-idling signs, air filtration systems, outreach to independent owner operators, and enforcement for air quality concerns • CSC members requested collaboration with other responsible agencies such as CalGEM, City of Los Angeles, and the County of Los Angeles to provide solutions to community concerns	• Feedback on air quality concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP
December 2021	• Overview of Autobody and Metal Processing Requirements	• Testimony from community business owner of a metal facility.	• Feedback on air quality concerns helped identify actions needing to

Community Meeting	Discussion Topic(s)	CSC Input	How was CSC input used in the CERP development process?
	• CARB's Technology Clearinghouse	• Brainstorming solutions for potential CERP actions such as community outreach, enforcement, incentive opportunities, and reducing exposure for nearby schools and residents	be addressed and included in the Preliminary Draft CERP
January 2022	• Extension Request Update for CERP • CAMP Development • Updated Actions for Oil and Gas Production Sites and Mobile Sources	• Discussed oil and gas and mobile source related actions • Community testimonies for more regulation, adverse health impacts, and phasing out oil and gas production	• Feedback on air quality concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP
February 2022	• Update on CAMP and CERP Development • New MWT • Updated Actions for Auto Body Shops and Metal Facilities	• Testimonial from community co-leads regarding dry cleaners and the need for transition to alternative cleaning technologies • Discussed general industrial facilities, and potential auto body shop and metals related actions	• Feedback on air quality concerns helped identify actions needing to be addressed and included in the Preliminary Draft CERP
March 2022	• CERP and CAMP Workshops	• Discussed CERP actions included in the Preliminary Draft CERP	• CSC member requests were considered for revised Preliminary Draft CERP

Community Meeting	Discussion Topic(s)	CSC Input	How was CSC input used in the CERP development process?
April 2022	• Updates on CERP and CAMP development • Updated Actions for Air Quality Priorities	• Discussed updates to CERP actions in response to comments received for the Preliminary Draft CERP	• Feedback on air quality action updates to be addressed and considered for the Revised Draft CERP
May 2022	• Draft CAMP and MWT meeting updates • Discussion on update to the Preliminary Draft CERP based on 10 comment letters received	• Discussed suggested language to the Preliminary Draft CERP actions	• Feedback on air quality action updates to be addressed and considered for the Revised Draft CERP

Meeting Interpretation and Translation of Documents

Spanish interpretation was available at each meeting. TLC Interpreting & Translation Services, Inc. provided interpretation services at the community meetings. Further, all meeting materials and documentation were translated into Spanish.

Appendix 4

Enforcement Overview and History

Enforcement Overview

Authority and Legal Rights

Under both the federal Clean Air Act and the California Health and Safety Code, South Coast Air Quality Management District (South Coast AQMD) is required to ensure its rules and regulations are enforceable. These rules and regulations are designed to ensure that the region meets federal and state ambient air quality standards for criteria pollutants. South Coast AQMD also has authority to enforce its rules and regulations that regulate toxic air contaminants. In some cases, CARB delegates enforcement authority to local air districts. More often for toxic air contaminants, South Coast AQMD will adopt a rule that is equally or more stringent than state or federal requirements and enforce its locally adopted rules and regulations.

To enforce local, state, and federal air pollution regulations, California Air Resources Board (CARB)[1] and South Coast AQMD[2] conduct inspections of potential air pollution sources under their respective jurisdictions and take enforcement action (i.e., issue Notices of Violation (NOVs)) that can lead to civil penalties. Civil penalties vary based on different factors and range from up to $10,000 per day per violation for strict liability and increase depending on whether the conduct was negligent or intentional. Significant penalties are authorized for up to $1,000,000 for conduct that causes great bodily injury or death. In cases involving potential criminal violations, South Coast AQMD may refer matters to federal, state, or local prosecuting agencies. If necessary, inspection warrants may be obtained when access to facilities or potential emissions sites is denied. On August 7, 2017, Assembly Bill 1132 (AB 1132) was signed into law, providing an additional tool for air pollution control officers to protect communities if a person is found to cause an imminent and substantial endangerment to public health or welfare. Under California Health and Safety Code, Section 42451.5, air pollution control officers are provided the ability to issue an interim order for abatement, pending a hearing, if the air pollution control officer finds that any person is causing an imminent and substantial endangerment to the public health or welfare, or the environment, by constructing or operating any article, machine, equipment, or other contrivance without a permit required by this part, or by violating California Health and Safety Code, Sections 41700 or 41701, or any order, rule, or regulation prohibiting or limiting the discharge of air contaminants into the air. An interim order shall be effective upon the notification of the person of the issuance of the order. In notifying the person, the air pollution control officer shall also provide the person with an accusation specifying the grounds on which the order is issued and procedures by which the person may challenge the order. Prior to the enactment of AB 1132,

[1] California Air Resources Board, https://ww2.arb.ca.gov/about/history. Accessed November 3, 2020.
[2] South Coast AQMD, https://www.aqmd.gov/nav/about/authority/enforcement. Accessed November 3, 2020.

only the Hearing Board could issue an order for abatement following a noticed hearing. Please refer to California Health and Safety Code, Section 42451.5 for additional details.

South Coast Air Quality Management District

The primary objective of South Coast AQMD's enforcement program is to ensure compliance with its rules, regulations, and permit conditions, and to protect public health. South Coast AQMD has a robust compliance program where inspectors conduct regular inspections to verify compliance with the agency's rules and permit conditions, respond to air quality complaints such as dust, odors, or visible emissions, and respond to emergency situations where there is a potential air quality impact. Inspectors also visit facilities to verify operators that are required to have a South Coast AQMD Permit to Operate for regulated equipment, processes, and operations are operating with the proper South Coast AQMD permit. The South Coast AQMD's compliance program ensures that rules and regulations are being properly implemented and operators are consistently adhering to the permit conditions which also ensures a level playing field for all regulated entities and to prevent unfair advantages for companies that choose not to comply with rules and permit conditions.

The public is an integral part of the South Coast AQMD's overall compliance program. The public can make a complaint by calling 1-800-CUT-SMOG or on the South Coast AQMD website. Air pollution concerns received directly from community members by way of public complaints are a very important source of information. When the South Coast AQMD receives a public complaint, the complaints are assigned to inspectors for investigation, with priority for ongoing issues that are impacting the public. In addition to responding to complaints from community members, South Coast AQMD also receives notifications directly from facilities and referrals from other agencies, both of which can initiate investigations. South Coast AQMD also performs unannounced inspections at facilities to verify compliance.

South Coast Air Quality Management District Hearing Board

The South Coast AQMD Hearing Board is a quasi-judicial panel authorized to provide relief from South Coast AQMD regulations under certain circumstances and to issue orders requiring businesses to take specific actions to achieve compliance with regulations. As state law requires, Hearing Board members are appointed by, but act independently of, the South Coast AQMD Governing Board. The Hearing Board is authorized to hear:

- Petitions for variances by entities (e.g., individuals, companies, public agencies).

- Petitions for abatement orders. An abatement order requires an entity operating out of compliance to take specific actions or to shut down its operation. This is a severe remedy normally reserved for serious violations.
- Appeals regarding granting of permits, permit conditions, permit denials and suspensions, denials of emission reduction credits, and denials of pollution control plans.
- Appeals by third parties.

An owner or operator that petitions the Hearing Board for a variance from a rule provision is required pursuant to South Coast AQMD Rule 515 – Findings and Decisions to demonstrate that the following six findings on a case are made, before a variance can be granted (California Health and Safety Code, Section 42352):

1. That the petitioner for a variance is, or will be, in violation of Section 41701 or of any rule, regulation, or order of the district;
2. That, due to conditions beyond the reasonable control of the petitioner, requiring compliance would result in either:
   - an arbitrary or unreasonable taking of property, or
   - the practical closing and elimination of a lawful business;
3. That the closing or taking would be without a corresponding benefit in reducing air contaminants;
4. That the applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance;
5. During the period the variance is in effect, that the applicant will reduce excess emissions to the maximum extent feasible; and
6. During the period the variance is in effect, that the applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the district, and report these emission levels to the district pursuant to a schedule established by the district.

The Hearing Board is not authorized to:

- Modify rules (Adoption and amendments to South Coast AQMD rules and regulations are under the purview of the South Coast AQMD Governing Board);
- Exempt an entity from complying with a rule;
- Grant a variance from a violation of the public nuisance law, such as one that creates an odor problem or threatens public health or property; or

- Review a violation notice.

After hearing all sides of a case in which an entity is having problems complying with South Coast AQMD rules, the Hearing Board weighs the evidence and makes a decision. For additional information on the Hearing Board and requirements, please refer to the Hearing Board website.[3]

South Coast Air Quality Management District Compliance and Enforcement Program Structure

Office of Compliance and Enforcement Teams

The structure of the Office of Compliance and Enforcement group is based on inspection teams that focus on source type, with most inspectors assigned by geographic region, and some inspectors are assigned to specific facilities. An organizational structure based on source type enables inspectors to become technical specialists on the air pollution regulations that apply to the types of industries or facilities assigned to that inspection team. In addition, assigning inspectors by geographic area improves the agency's ability to respond in a timely manner to complaints or compliance issues in their assigned areas.

Table A4-1: South Coast AQMD Inspection Teams

Team	Number of Active Facilities[4]
Area Sources	58
Energy	22
Industrial, Commercial, & Government Operations	517
Major Sources	3
Service Stations (Rule 461)	120
Toxics & Waste Management	46

[3] South Coast AQMD, Hearing Board, http://www.aqmd.gov/nav/about/hearing-board
[4] Number of active facilities based on the South Coast AQMD database in September 2021

Examples of those inspection teams, listed in **Table A4-1**, include: the Industrial, Commercial, and Government Operations team which has broad knowledge to inspect a wide variety of source types and equipment, the Toxics and Waste Management team which has the training and personal protective equipment to conduct inspections at facilities with toxic air contaminants, the Energy team which has specialized equipment to conduct oil well inspections, and the 461 team which specializes in gas dispensing operations (i.e., service stations). Certain facilities may be inspected by South Coast AQMD from multiple teams. This ensures that the approach is focused on addressing a variety of sources, yet flexible enough to handle complex facilities. A list of inspection teams is provided in **Figure A4-1** below.

The frequency of regular inspections depends on the type of facility. For example, a chrome plating facility is inspected more frequently than an auto body shop. It is important to consider that there are approximately 110 chrome plating facilities in the South Coast Air Basin, compared to over 1,500 auto body facilities in the South Coast Air Basin. When considering limited resources, priority for inspections is typically given to higher risk pollution sources – that is, those facilities that emit the more toxic air pollutants and/or are close to schools, hospitals, and residential areas.

Figure A4-1: South Coast AQMD Enforcement Program

The **Area Sources team** focuses on emissions sources that are relatively common and widely distributed. Although each individual source may be small, together these sources have a substantial cumulative impact on air pollution. Examples include consumer paints and products (e.g., hairspray and home cleaning products), residential water heaters, and agricultural burning.

The **Industrial team** focuses on a wide variety of sources, from dry cleaners to large manufacturing facilities to idling trucks. Inspectors on this team are assigned a geographic region and spend much of their time in their assigned area. From this team, inspectors regularly conduct compliance activities in South Los Angeles (SLA).

The **Major Sources team** focuses on facilities that participate in the RECLAIM* program. Many of these facilities are also inspected by other teams, such as the Refinery and Energy teams. Examples of these sources include power plants, oil production sites, and large manufacturing facilities. Inspectors on this team are assigned to specific facilities, some of which are in SLA.

The **Service Station team** focuses on retail gasoline service stations and mobile fueling companies. Fueling operations can emit volatile organic compounds (VOCs). Inspectors on this team are assigned a geographic region, including within SLA.

The **Toxics team** focuses on facilities that emit toxic air contaminants, including hexavalent chromium, lead, and other toxic metals. Examples include landfills, waste treatment facilities, and plating shops. Inspectors on this team are assigned a geographic region and regularly conduct compliance activities in SLA.

The **Energy team** focuses on crude oil production, energy storage sites, and bulk petroleum terminals. Inspectors on this team are assigned by facility, with each inspector assigned a set of facilities, some of which are within SLA.

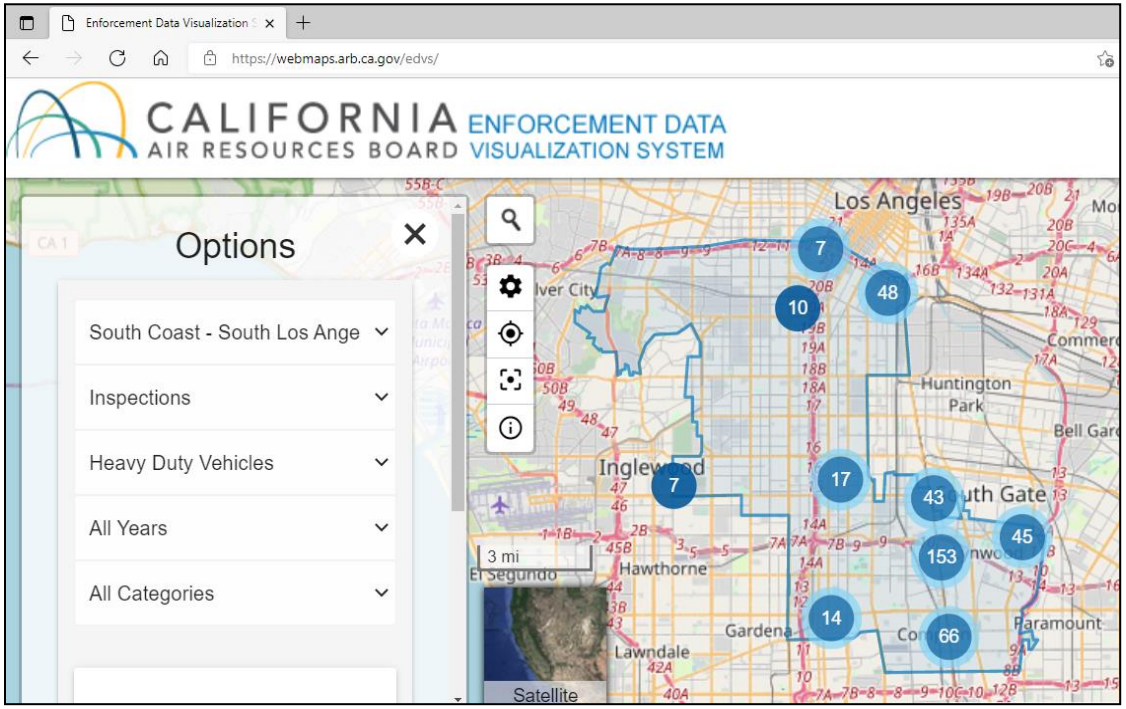
The **Refinery team** focuses on all the refineries, auxiliary hydrogen plants, and marine terminals in the South Coast Air Basin. Inspectors on this team are assigned by facility, with each inspector dedicated to a refinery and its auxiliary plants. This team is based full-time in the Long Beach Field Office to ensure close proximity to the refinery sources that it regulates. Since there are no oil refineries within SLA, this team does not generally conduct inspections within SLA.

* REgional CLean Air Incentives Market (RECLAIM) requires participating facilities to manage their total nitrogen oxides (NOx) and/or sulfur oxides (SOx) emissions by adding pollution controls, changing their equipment or processes, or buying credits from other RECLAIM facilities that have lower emissions than their cap. The allowable amount of such emissions is reduced over time. The program is in the process of being transitioned to a command-and-control regulatory program. For more information about RECLAIM, please refer to Appendices 2a: Community Profile and 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

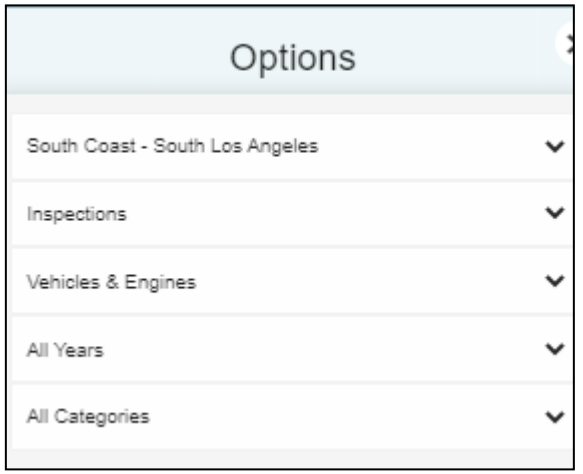
California Air Resources Board Enforcement Mapping Tool

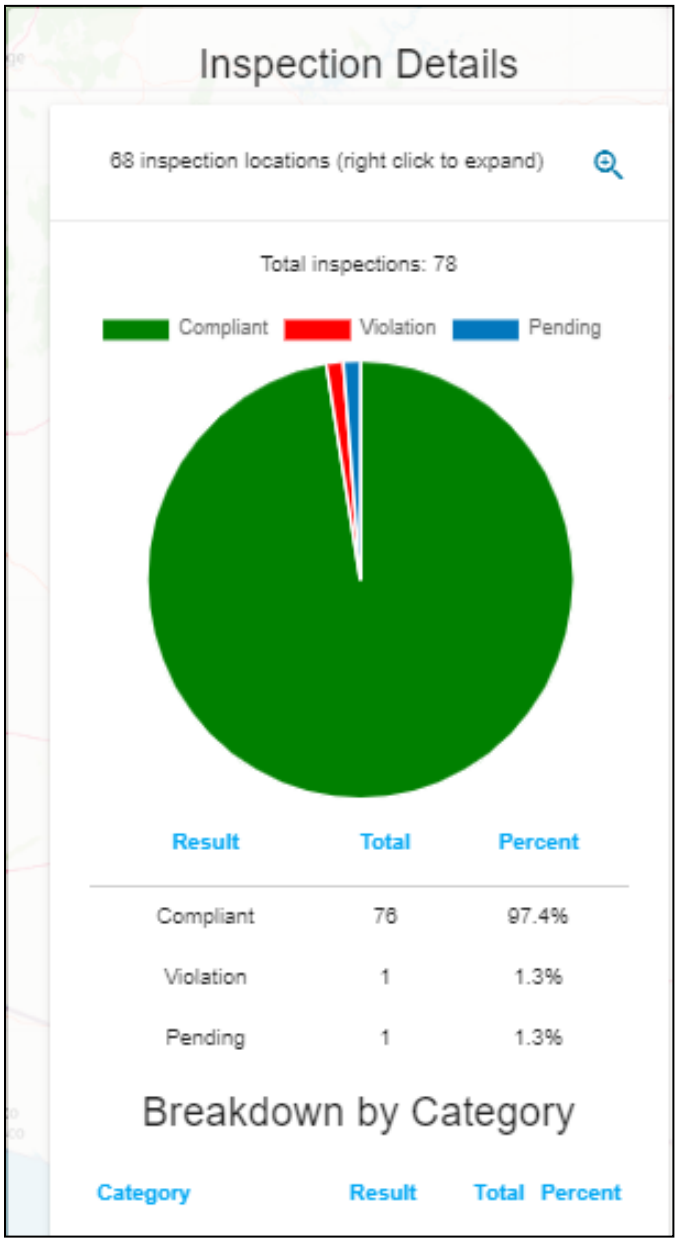
CARB's enforcement approach is two-pronged: ensuring compliance through robust, regular inspections and deterring violations through its penalty assessment process. From the compliance-side, it includes conducting both field inspections and fleet-wide audits. From the deterrence-side, CARB encourages violators to support CARB's community-based projects program by setting aside a portion of penalties paid from enforcement action settlements for Supplemental Environmental Projects (SEPs). To increase accessibility to inspection and settlement data to the community, CARB created the Enforcement Data Visualization System (EDVS)[5]. It allows community members to view CARB's inspection data in a way that can help inform where future enforcement efforts should be conducted by mapping locations where inspections occur. Community members can see a big picture view of the inspections and vehicle compliance with CARB's rules in that area, or can choose more specific information to look at for vehicle compliance to answer questions like, how many vehicles have been inspected for compliance with CARB's truck and bus regulation in 2020 in SLA.

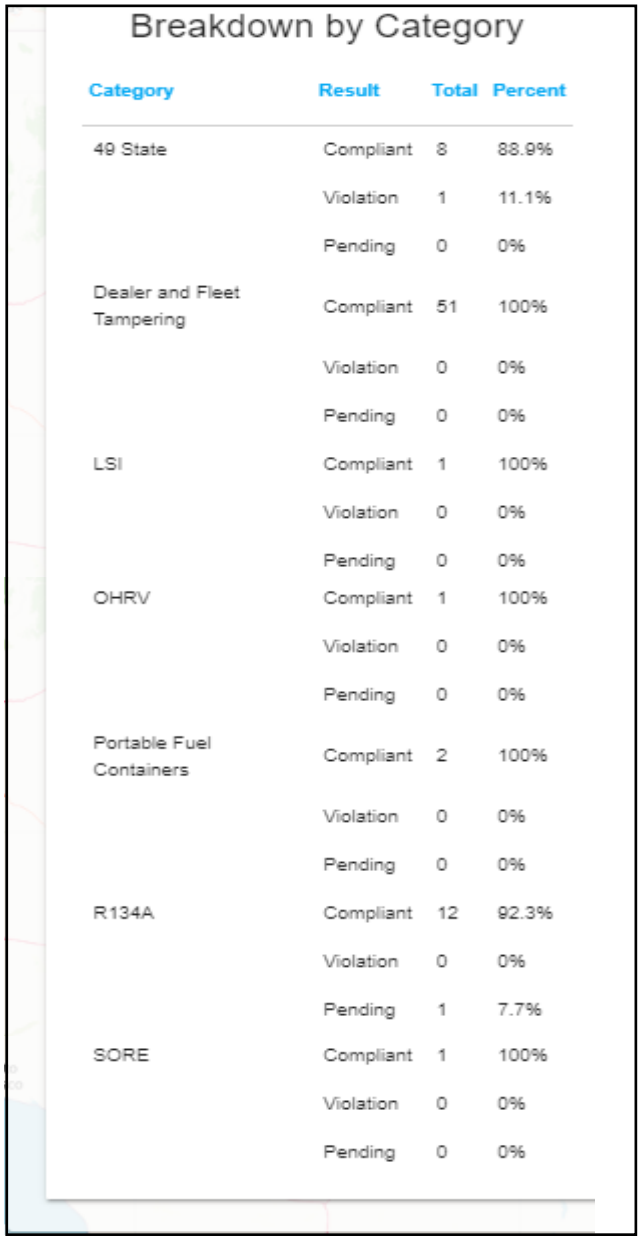
[5] CARB, Enforcement Data Visualization System, https://webmaps.arb.ca.gov/edvs



Inspection details appear when one of the blue circles in clicked on. EDVS breaks down inspections by area (e.g., South Coast – SLA), program type (e.g., Vehicles and Engines), year (e.g., all years, 2015 - 2021) and enforcement program (e.g., all categories) as in the example report below.







Breakdown by Category

Category	Result	Total	Percent
49 State	Compliant	8	88.9%
	Violation	1	11.1%
	Pending	0	0%
Dealer and Fleet Tampering	Compliant	51	100%
	Violation	0	0%
	Pending	0	0%
LSI	Compliant	1	100%
	Violation	0	0%
	Pending	0	0%
OHRV	Compliant	1	100%
	Violation	0	0%
	Pending	0	0%
Portable Fuel Containers	Compliant	2	100%
	Violation	0	0%
	Pending	0	0%
R134A	Compliant	12	92.3%
	Violation	0	0%
	Pending	1	7.7%
SORE	Compliant	1	100%
	Violation	0	0%
	Pending	0	0%

Below you can find additional information on the enforcement programs conducted by CARB in the SLA community:

Heavy Duty Vehicles Programs

- **HDVIP:** Heavy-duty diesel vehicle inspection program.[6] There are a few types of inspections that occur under this program. **HDVIP - Diesel Emission Fluid**: Diesel engines equipped with Selective Catalytic Reduction (SCR) all use a liquid urea solution as the reductant, known commonly as diesel exhaust fluid (DEF). This fluid is used in the SCR to reduce NOx emissions. **HDVIP – Emission Control Label**: Engine certification labeling requirements that certify that engines meet clean emission standards. **HDVIP – Smoke/Tampering**: Requires heavy-duty trucks and buses to be inspected for excessive smoke and tampering.
- **Idling:** Limits exist to idling for trucks and buses in California.[7]
- **Off-Road**: Regulations aimed at cleaning up 'off-road' construction equipment such as bulldozers, graders, and backhoes. These requirements are in place to help ensure that diesel soot filters are installed on off-road equipment.[8]
- **Transport Refrigeration Units (TRU)**: Inspect secondary engines to ensure TRUs meet labeling and clean air requirements.[9]
- **Truck & Bus**: All trucks and buses with 2009 or older engines weighing over 14,000 pounds must reduce exhaust emissions by upgrading to 2010 or newer engines by 2023. Senate Bill 1 will deny DMV registration to non-compliant vehicles.[10]

Fuels Program

CARB enforces regulations related to gas, diesel, and racing fuels as well as storage of fuels from refineries through transportation to distribution at fuel service stations.[11]

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[6] CARB, Heavy-Duty Diesel Inspection & Periodic Smoke Inspection Programs, https://ww2.arb.ca.gov/our-work/programs/heavy-duty-diesel-inspection-periodic-smoke-inspection-program

[7] CARB, Heavy-Duty Diesel Vehicle Idling Information, https://ww2.arb.ca.gov/capp-resource-center/heavy-duty-diesel-vehicle-idling-information

[8] CARB, Final Regulation Order Regulation For In-Use Off-Road Diesel-Fueled Fleets, https://ww2.arb.ca.gov/sites/default/files/classic/msprog/ordiesel/documents/finalregorder-dec2011.pdf

[9] CARB, Transport Refrigeration Unit, https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit

[10] CARB, Final Regulation Order for Regulation to Reduce Emissions from In-Use Heavy-Duty Diesel-Fueled Vehicles, https://ww3.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf

[11] CARB, Fuels Enforcement Program, https://ww2.arb.ca.gov/our-work/programs/fuels-enforcement-program#:~:text=Fuels%20Enforcement%20Program%20Back%20To%20All%20Programs%20CARB,approximately%2055%20percent%20of%20air%20pollution%20emissions%20statewide

Vehicles and Engines Program

- **49 State:** Ensures that vehicles and engines are certified to both California and United States Environmental Protection Agency (U.S. EPA) standards, not just U.S. EPA standards that are valid for the other 49 states.
- **Dealer and Fleet Tampering**: South Coast AQMD inspects automobile dealerships and commercial fleets to ensure new vehicles and engines are certified to California emissions standards, and that emissions control systems are not tampered with.
- **LSI:** CARB ensures compliance with certified emissions standards for spark-ignition engines, including large spark-ignition (LSI) engines, and the evaporative emissions control systems of vehicles and equipment like forklifts, sweeper/scrubbers, industrial tow tractors, and airport ground support equipment.[12]
- **OHVR:** CARB ensures off-highway recreational vehicles (OHVR), such as off-highway motorcycles and all-terrain vehicles (ATVs) used recreationally, in agriculture, building and trades, landscape maintenance and law enforcement, meet emissions standards for smog pre-cursors and evaporative emissions. Portable fuel containers: CARB ensures all gas cans (PFCs) used to fill equipment like lawnmowers, vehicles, and personal watercraft minimize spillage and meet low-emissions requirements through the implementation of low permeation plastics and automatic sealing nozzles.[13]
- **R134A:** CARB ensures small containers of mobile air conditioning refrigerant (HFC-134a) minimize greenhouse gas emissions by meeting requirements, such as having self-sealing valves on the containers.[14]
- **SORE:** CARB ensures that certified exhaust emissions standards are complied with for Small Off-Road Engines (SORE) used in lawn and garden equipment as well as other outdoor power equipment and specialty vehicles.[15]

CARB offers a factsheet in English and Spanish to give community members further highlights, and a video tutorial in English and Spanish, for those who could use some extra guidance on how to use the tool.[16]

[12] CARB, Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation, https://ww2.arb.ca.gov/our-work/programs/large-spark-ignition-lsi-engine-fleet-requirements-regulation
[13] CARB, Off-Highway Recreational Vehicles, https://ww2.arb.ca.gov/our-work/programs/highway-recreational-vehicles
[14] CARB, Small Containers of Automotive Refrigerant, https://ww2.arb.ca.gov/our-work/programs/small-containers-automotive-refrigerant
[15] CARB, Small Off-Road Engines (SORE), https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore
[16] CARB, Community Outreach and Enforcement, https://ww2.arb.ca.gov/our-work/programs/community-outreach-and-enforcement

South Coast Air Quality Management District Enforcement History

From 2018 through 2021,[1] in the South Los Angeles (SLA) area, South Coast AQMD conducted approximately 765 inspections and responded to approximately 3,034 public complaints. These inspections resulted in 204 NOVs and 312 Notices to Comply (NCs). The tables below contain a four-year South Coast AQMD enforcement history as required by the CARB Blueprint,[17,18] specifically:

1. **Table A4-2**: A list of all facilities within SLA that have an active permit with South Coast AQMD;[19]
2. **Table A4-3**: A list of all the inspections conducted by South Coast AQMD inspectors from 2018 through 2021; and
3. **Table A4-4**: A list of all the NOVs and NCs issued within SLA from 2018 through 2021.

Table A4-2: Facility List with Active Permits in SLA

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
14221 FIGUEROA	188036	14221 S FIGUEROA ST LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
1924 WEST ALONDRA BLVD	193347	1924 W ALONDRA BLVD COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
2231 S. WESTERN (LA) LLC	188931	2231 S WESTERN AVE LOS ANGELES, CA 90018	531312	Nonresidential Property Managers	11	Industrial, Commercial, & Government Operations
323 AUTO COLLISION CENTER	184881	355 E MANCHESTER AVE LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
3775 VERMONT	188031	3775 S VERMONT ST LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations

[17] CARB, Community Air Protection Blueprint, https://ww2.arb.ca.gov/capp-blueprint
[18] A three-year enforcement history is part of the enforcement plan requirements set forth in CARB's Blueprint.
[19] Data is according to the information in the South Coast AQMD Permitting database in September 2021

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
405 AUTO CRAFT	183628	3029 W 48TH ST LOS ANGELES, CA 90043	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
7-ELEVEN #37274	193145	12801 S CENTRAL AVE LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
7-ELEVEN #37694	182924	10000 S VERMONT AVE LOS ANGELES, CA 90044	447190	Other Gasoline Stations	40	Service Stations
7-ELEVEN #38197	189785	505 W CENTURY BLVD LOS ANGELES, CA 90044	447190	Other Gasoline Stations	40	Service Stations
8210 WESTERN AVE., 26 LLC	182624	8216 S WESTERN AVE LOS ANGELES, CA 90047	562910	Remediation Services	61	Toxics and Waste Management
A & B BEDROOMS INC	175476	6310 AVALON BLVD LOS ANGELES, CA 90003	3371	Household and Institutional Furniture and Kitchen Cabinet Manufacturing	11	Industrial, Commercial, & Government Operations
A & J BODY SHOP	151195	900 E COMPTON BLVD COMPTON, CA 90221	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
A A CARTER TRUCK-HIVCO	107511	750 E SLAUSON AVE LOS ANGELES, CA 90011	336211	Motor Vehicle Body Manufacturing	11	Industrial, Commercial, & Government Operations
A AND B AUTO BODY AND SALES INC	96419	14200 S SAN PEDRO ST LOS ANGELES, CA 90061	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
A AND B CENTRAL, INC., DBA ANDY'S SHELL	147056	1150 E IMPERIAL LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
A AND B LONG BEACH INC	176130	11151 LONG BEACH BLVD LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
A M OIL	153912	105 E IMPERIAL HWY LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
AAA ADVANCE FINISHING, INC	53868	11645 S BROADWAY LOS ANGELES, CA 90061	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
AAA PLATING & INSPECTION, INC	25087	424 DIXON ST COMPTON, CA 90222	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
AAMES SERVICE INC., KIM'S UNION 76	147273	14216 S AVALON BLVD LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
ABRASIVE FINISHING CO	22363	14920 S MAIN ST GARDENA, CA 90248	332811	Metal Heat Treating	11	Industrial, Commercial, & Government Operations
AC BODY SHOP AND AUTO MECH.	58606	11596 S ATLANTIC AVE LYNWOOD, CA 90262	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
AC UNIVERSAL BODY SHOP	159886	6819 S BROADWAY LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ACCURATE ANODIZING, INC	62266	1801 W EL SEGUNDO BLVD COMPTON, CA 90222	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	74	Toxics and Waste Management
ACE FUELS INC	185608	390 W COMPTON BLVD COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
ACS BODY & PAINT	182422	1855 W GAGE AVE LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ADAMS BODY SHOP	127701	4857 W ADAMS BLVD LOS ANGELES, CA 90016	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ADRIANO DESIGN INC	140681	244 W 140TH ST LOS ANGELES, CA 90061	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
ADVANCE CLEANERS	184530	1389 W 29TH ST LOS ANGELES, CA 90007	81232	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
ADVANCE PAPER BOX CO	47084	6100 S GRAMERCY PL LOS ANGELES, CA 90047	322212	Folding Paperboard Box Manufacturing	5	Industrial, Commercial, & Government Operations
AG LYNWOOD LLC.	147834	3611 E IMPERIAL HWY LYNWOOD, CA 90262	623110	Nursing Care Facilities (Skilled Nursing Facilities)	11	Industrial, Commercial, & Government Operations
AHMED UNION 76	155446	11175 LONG BEACH BLVD LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
AIRCOAT, INC.	113761	13405 S BROADWAY LOS ANGELES, CA 90061	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
AIRGAS USA, INC.	164982	352 W 133RD ST LOS ANGELES, CA 90061	325120	Industrial Gas Manufacturing	11	Industrial, Commercial, & Government Operations
AIRGAS USA, LLC	108370	11711 S ALAMEDA ST LOS ANGELES, CA 90059	424690	Other Chemical and Allied Products Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
AIRGAS USA, LLC	164981	11711 S ALAMEDA ST LOS ANGELES, CA 90059	424690	Other Chemical and Allied Products Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
AIRGAS USA, LLC, AIRGAS INC.	171842	12000 ALAMEDA ST LYNWOOD, CA 90262	424690	Other Chemical and Allied Products Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
AITA CLUTCH INC	102422	960 S SANTA FE AVE COMPTON, CA 90221	3363	Motor Vehicle Parts Manufacturing	56	Toxics and Waste Management
AL QAYYUM OIL CORPORATION	140073	255 E MANCHESTER AVE LOS ANGELES, CA 90001	447190	Other Gasoline Stations	40	Service Stations
ALAMEDA BUSINESS CENTER	189290	126 E ORIS ST COMPTON, CA 90222	999990	Other	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ALBERTO'S FINE ART'S FURNITURE	139609	10460 S VERMONT AVE LOS ANGELES, CA 90044	3371	Household and Institutional Furniture and Kitchen Cabinet Manufacturing	11	Industrial, Commercial, & Government Operations
ALBERTSON'S NO 4131	133084	3901 CRENSHAW BLVD LOS ANGELES, CA 90008	445110	Supermarkets and Other Grocery (except Convenience) Stores	32	Area Sources
ALERT CLEANERS, BENJAMIN HURTADO	115285	2000 E ROSECRANS AVE COMPTON, CA 90221	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
ALEX CLEANERS	134482	2036 N SANTA FE AVE COMPTON, CA 90221	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
ALEXANDER & WILLIS	169256	200 W 140TH ST LOS ANGELES, CA 90061	337214	Office Furniture (except Wood) Manufacturing	11	Industrial, Commercial, & Government Operations
ALIGN SUTTON RECREATION CNTR CITY OF LA	190537	8800 S HOOVER ST LOS ANGELES, CA 90044	713940	Fitness and Recreational Sports Centers	31	Area Sources
ALL SEASON AUTO BODY & PAINT INC	180804	8506 S WESTERN AVE LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ALLENCO ENERGY, INC	161814	814 W 23RD ST LOS ANGELES, CA 90007	211111	Crude Petroleum Extraction	15	Energy

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ALLIED WASTE SERVICES	158682	14905 S SAN PEDRO ST GARDENA, CA 90247	562212	Solid Waste Landfill	11	Industrial, Commercial, & Government Operations
ALONDRA OIL INC	185262	220 W ALONDRA BLVD COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
ALPHA CENTURION	55129	802 E GAGE AVE LOS ANGELES, CA 90001	325180	Other Basic Inorganic Chemical Manufacturing	11	Industrial, Commercial, & Government Operations
AL'S FURNITURE DESIGN, INC	174281	912 E 60TH ST LOS ANGELES, CA 90001	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
ALTA ADAMS RESTAURANT PROJECT LLC	187437	5359 W ADAMS BLVD LOS ANGELES, CA 90016	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
ALVARADO CABRERA	193573	634 E 79TH ST LOS ANGELES, CA 90001	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
AMCAL SUNRISE FUND, L.P.	168181	5125 S MAIN ST LOS ANGELES, CA 90037	237210	Land Subdivision	11	Industrial, Commercial, & Government Operations
AMERICA WOOD FINISHES CORP	132266	728 E 59TH ST LOS ANGELES, CA 90001	424950	Paint, Varnish, and Supplies Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
AMERICAN BEDROOMS INC.	189652	610 E 59TH ST LOS ANGELES, CA 90001	999990	Other	11	Industrial, Commercial, & Government Operations
AMERICAN DYE HOUSE, INC.	145417	13024 S SPRING ST LOS ANGELES, CA 90061	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
AMERICAN NATIONAL RED CROSS	171853	2533 S FAIRFAX AVE CULVER CITY, CA 90232	621991	Blood and Organ Banks	11	Industrial, Commercial, & Government Operations
AMERICAN TEXTILE MAINTENANCE, REPUBLIC	60043	1705 S HOOPER AVE LINEN SUPPLY LOS ANGELES, CA 90021	812331	Linen Supply	11	Industrial, Commercial, & Government Operations
AMFOAM INC	139252	15110 S BROADWAY ST GARDENA, CA 90248	326150	Urethane and Other Foam Product (except Polystyrene) Manufacturing	11	Industrial, Commercial, & Government Operations
AMIN'S OIL INC	139323	2603 S NORMANDIE AVE LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations
AMKO FIXTURES & SEATING CO	120636	5833 S AVALON BLVD LOS ANGELES, CA 90003	337127	Institutional Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
ANGEL'S GAS AND MART, SOON HWAN OH DBA	142287	1248 S WILMINGTON AVE COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
ANTIQUE FINISH INC	134043	8626 S SAN PEDRO ST LOS ANGELES, CA 90003	453310	Used Merchandise Stores	11	Industrial, Commercial, & Government Operations
APRO LLC	189707	4502 E ROSECRANS COMPTON, CA 90221	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITED OIL #124	177906	502 W ROSECRANS COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITED OIL #133	177917	11515 S ATLANTIC AVE LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITED OIL #150	177956	2121 ARLINGTON AVE LOS ANGELES, CA 90018	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITED OIL #182	177990	5100 W JEFFERSON BLVD LOS ANGELES, CA 90046	447190	Other Gasoline Stations	40	Service Stations

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APRO LLC DBA UNITED PACIFIC #0606	192376	10000 S FIGUEROA ST LOS ANGELES, CA 90044	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITED PACIFIC #0613	192374	505 W VERNON AVE LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITED PACIFIC #0616	192378	1350 W FLORENCE AVE LOS ANGELES, CA 90044	447190	Other Gasoline Stations	40	Service Stations
APRO LLC DBA UNITIED OIL #101	177857	450 E EL SEGUNDO BLVD LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
ARCHITECTURAL ANTIQUES WEST	145868	13900 S BROADWAY LOS ANGELES, CA 90061	423310	Lumber, Plywood, Millwork, and Wood Panel Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
ARCO # 1691 / SECOR INTL INCORPORATED	138112	740 W ROSECRANS AVE COMPTON, CA 90222	562910	Remediation Services	60	Toxics and Waste Management
ARCO #42114	174635	4406 ADAMS BLVD LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
ARMANDO'S FURNITURE FINISHING	99686	4912 W JEFFERSON BLVD LOS ANGELES, CA 90016	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
ARMAR BODY SHOP	192692	11601 LONG BEACH BLVD LYNWOOD, CA 90262	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ARTISANAL EXPRESSIONS, INC	170904	14932 S FIGUEROA ST GARDENA, CA 90248	445299	All Other Specialty Food Stores	11	Industrial, Commercial, & Government Operations
ARTISTIC WELDING WORK SHOP	146166	1446 W SLAUSON AVE LOS ANGELES, CA 90047	332323	Ornamental and Architectural Metal Work Manufacturing	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ARTO BRICK CALIFORNIA PAVERS	161677	15209 S BROADWAY ST GARDENA, CA 90248	327120	Clay Building Material and Refractories Manufacturing	11	Industrial, Commercial, & Government Operations
ASBESTOS INSTANT RESPONSE INC	133566	VARIOUS LOCATIONS IN SCAQMD LOS ANGELES, CA 90018	562910	Remediation Services	72	Toxics and Waste Management
AUTO DETAIL SPECIALISTS & SERVICES LLC	174654	3841 S BROADWAY PL LOS ANGELES, CA 90037	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
AUTO ER COLLISION & TIRES	177467	6132 S VERMONT AVE LOS ANGELES, CA 90044	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
AUTOMOBILE CLUB OF SO CAL	17171	2601 S FIGUEROA ST LOS ANGELES, CA 90007	524210	Insurance Agencies and Brokerages	11	Industrial, Commercial, & Government Operations
AUTOPRO COLLISION CENTER	175372	2130 S VERMONT LOS ANGELES, CA 90007	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
AUTOPRO SERVICE CENTER	191634	3311 MULFORD AVE LYNWOOD, CA 90262	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
AUTO-TECH BODY SHOP	152099	3475 W SLAUSON AVE LOS ANGELES, CA 90043	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
AUTO-TECH COLLISION CENTER	122009	1116 W WASHINGTON BLVD LOS ANGELES, CA 90015	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

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AVALON ARCO & SN MART	165878	9600 S AVALON BLVD LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
AVALON PACKING,AMERICAN FOOD PROCESSING	185630	2501 W ROSECRANS AVE LOS ANGELES, CA 90059	311000	Food Manufacturing	11	Industrial, Commercial, & Government Operations
AVALON PREMIUM TANK CLEANING	108730	14700 AVALON BLVD GARDENA, CA 90248	561990	All Other Support Services	56	Toxics and Waste Management
AVNEX SURFACE FINISHING INC.	189752	327 W 132ND ST LOS ANGELES, CA 90061	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	74	Toxics and Waste Management
B & F METAL FINISHING	169428	12930 ATHENS WAY LOS ANGELES, CA 90061	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	11	Industrial, Commercial, & Government Operations
BALI CORNER	75257	3333 S HOOVER LOS ANGELES, CA 90007	722513	Limited-Service Restaurants	30	Area Sources
BARANDEH INC	191937	2820 E ALONDRA BLVD COMPTON, CA 90221	447190	Other Gasoline Stations	40	Service Stations
BARKEN'S HARDCHROME, INC	121215	239 E GREENLEAF BLVD COMPTON, CA 90220	333249	Other Industrial Machinery Manufacturing	75	Toxics and Waste Management
BIG RAY'S DRIVE IN	173175	2624 E ALONDRA BLVD COMPTON, CA 90221	722513	Limited-Service Restaurants	30	Area Sources
BLACK TUX, INC.	180260	14600 S MAIN ST GARDENA, CA 90248	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations

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BLUE BEACON OF LOS ANGELES	150893	1630 S MCGARRY ST LOS ANGELES, CA 90021	811192	Car Washes	11	Industrial, Commercial, & Government Operations
BLUE DAISY CEMENT PRODUCTS INC.	191476	306 & 314 E COMPTON BLVD GARDENA, CA 90247	327320	Ready-Mix Concrete Manufacturing	11	Industrial, Commercial, & Government Operations
BOB HOPE PATRIOTIC HALL	174831	1816 S FIGUEROA ST LOS ANGELES, CA 90015	813990	Other Similar Organizations (except Business, Professional, Labor, and Political Organizations)	11	Industrial, Commercial, & Government Operations
BOBO'S BURGERS	82579	3390 E IMPERIAL HWY LYNWOOD, CA 90262	722513	Limited-Service Restaurants	31	Area Sources
BODEGA LATINA CORP	158163	3321 W CENTURY BLVD INGLEWOOD, CA 90303	445110	Supermarkets and Other Grocery (except Convenience) Stores	11	Industrial, Commercial, & Government Operations
BOWERS & SONS CLEANERS, VIVIAN BOWERS DB	124815	2509 S CENTRAL AVE LOS ANGELES, CA 90011	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
BOWMAN PLATING CO INC	18989	2631 E 126TH ST COMPTON, CA 90222	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
BREITBURN OPERATING, LP	150197	130 W ROSECRANS AVE LOS ANGELES, CA 90059	211111	Crude Petroleum Extraction	15	Energy
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	9915 S BROADWAY BLVD LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations

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BROADWAY MART, INC	180406	315 W VERNON AVE LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations
BROADWOOD TERRACE RHF PARTNERS, LP	177161	5005 S MAIN ST LOS ANGELES, CA 90037	531110	Lessors of Residential Buildings and Dwellings	11	Industrial, Commercial, & Government Operations
BURGER BUDDIES, LLC DBA CARL'S JR.	180984	1400 E ROSECRANS AVE COMPTON, CA 90221	722513	Limited-Service Restaurants	30	Area Sources
BURGER CITY	66232	13501 AVALON BLVD LOS ANGELES, CA 90061	722511	Full-Service Restaurants	30	Area Sources
BURGER KING #4946	70770	2511 S SAN PEDRO ST LOS ANGELES, CA 90011	722513	Limited-Service Restaurants	31	Area Sources
BURGER KING #5567	63904	1673 103RD ST LOS ANGELES, CA 90002	722513	Limited-Service Restaurants	31	Area Sources
BURGER PALACE #1	69324	100 E MANCHESTER AVE LOS ANGELES, CA 90003	722513	Limited-Service Restaurants	31	Area Sources
BURGER PALACE #3	64865	7126 WESTERN AVE LOS ANGELES, CA 90047	722513	Limited-Service Restaurants	30	Area Sources
BUYRITE	103751	251 W MANCHESTER AVE LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
C & R PLATING, INC.	171832	245 W 135TH ST LOS ANGELES, CA 90061	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
C AND D SHAMMAS GROUP	177817	1801 S FIGUEROA ST LOS ANGELES, CA 90015	531210	Offices of Real Estate Agents and Brokers	11	Industrial, Commercial, & Government Operations
C B S FURNITURE MFG CO INC	25382	310 E 32ND ST LOS ANGELES, CA 90011	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations

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C J AUTO CENTER BODY & PAINT AUTO REPAIR	182615	1849 W GAGE ST LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
C L AUTO BODY SHOP	136685	4515 S VERMONT AVE LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
C. NEED DYEING	154915	1357 E 16TH ST LOS ANGELES, CA 90021	313310	Textile and Fabric Finishing Mills	11	Industrial, Commercial, & Government Operations
CAITAC GARMENT PROCESSING INC	113303	14725 S BROADWAY GARDENA, CA 90248	812332	Industrial Launderers	11	Industrial, Commercial, & Government Operations
CAL METAL PROCESSING CO	23410	1518 - W SLAUSON 1530 AVE LOS ANGELES, CA 90047	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	74	Toxics and Waste Management
CAL ST, HIGHWAY PATROL	7678	777 W WASHINGTON BLVD LOS ANGELES, CA 90015	922120	Police Protection	11	Industrial, Commercial, & Government Operations
CALIBER COLLISION CENTER	184574	4774 W ADAMS LOS ANGELES, CA 90016	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CALIFORNIA SCIENCE CENTER	128931	700 EXPOSITION PARK DR LOS ANGELES, CA 90037	712110	Museums	11	Industrial, Commercial, & Government Operations
CALIFORNIA AFRICAN AMERICAN MUSEUM	61817	600 STATE DR LOS ANGELES, CA 90037	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
CALIFORNIA WASTE SERVICES	137315	621 W 152ND ST GARDENA, CA 90247	562920	Materials Recovery Facilities	52	Toxics and Waste Management

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
CALTRANS - EAST LOS ANGELES MAINTENANCE	118578	4425 3 RD LOS ANGELES, CA 90022	926120	Regulation and Administration of Transportation Programs	11	Industrial, Commercial, & Government Operations
CAMPOS PINE FURNITURE INC	153526	5871 WALL ST LOS ANGELES, CA 90003	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
CARDLOCK FUELS SYSTEM INC	115258	506 W ROSECRANS GARDENA, CA 90248	447190	Other Gasoline Stations	40	Service Stations
CARDNO ERI	176682	1400 E ROSECRANS AVE COMPTON, CA 90221	541620	Environmental Consulting Services	11	Industrial, Commercial, & Government Operations
CARGILL INC	23106	2800 LYNWOOD RD LYNWOOD, CA 90262	3113	Sugar and Confectionery Product Manufacturing	11	Industrial, Commercial, & Government Operations
CARLOS CLEANERS	168277	1764 MARTIN LUTHER KING BLVD LOS ANGELES, CA 90062	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
CARLS JR #321	186532	2912 S FIGUEROA LOS ANGELES, CA 90007	722513	Limited-Service Restaurants	11	Industrial, Commercial, & Government Operations
CARL'S JR, HMR 4-804 LLC	154336	1001 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90037	722511	Full-Service Restaurants	31	Area Sources
CARL'S JR. RESTAURANT #364	64054	3621 E IMPERIAL HWY LYNWOOD, CA 90262	722513	Limited-Service Restaurants	31	Area Sources

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CARRILLO BODY SHOP	181878	1515 S ALAMEDA ST COMPTON, CA 90220	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CARSON - WILMINGTON, INC	156145	5820 S FIGUEROA ST LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
CARSON TRAILER INC	138885	14903 S MAPLE AVE GARDENA, CA 90248	336111	Automobile Manufacturing	11	Industrial, Commercial, & Government Operations
CASTLE CLEANERS, RICARDO RUIZ, DBA	121117	2524 E ALONDRA BLVD COMPTON, CA 90221	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
CBA PROPERTY MANAGEMENT	137826	7300 S SAN PEDRO ST LOS ANGELES, CA 90003	562910	Remediation Services	61	Toxics and Waste Management
CEMAK TRUCKING	86436	11700 S ALAMEDA ST LYNWOOD, CA 90262	336211	Motor Vehicle Body Manufacturing	11	Industrial, Commercial, & Government Operations
CEMCOAT INC	113621	4928 W JEFFERSON BLVD LOS ANGELES, CA 90016	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	11	Industrial, Commercial, & Government Operations
CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	55343	2722 N ALAMEDA ST COMPTON, CA 90222	327320	Ready-Mix Concrete Manufacturing	11	Industrial, Commercial, & Government Operations
CENTRAL KITCHEN	179509	325 W ADAM BLVD LOS ANGELES, CA 90007	722511	Full-Service Restaurants	30	Area Sources
CENTRAL VILLAGE APARTMENTS	164902	1315 E 21ST ST LOS ANGELES, CA 90011	531110	Lessors of Residential Buildings and Dwellings	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
CENTURY AND MAIN, INC.	147989	9922 S MAIN ST LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
CHALY'S DRY CLEANERS, FRANCISCO CLEMENTE	151830	914 S CENTRAL AVE COMPTON, CA 90220	81232	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
CHARBEL RADI	191370	5635 W WASHINGTON BLVD LOS ANGELES, CA 90016	811412	Appliance Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CHARTER COMMUNICATIONS	183157	5915 BOWCROFT ST LOS ANGELES, CA 90016	561499	All Other Business Support Services	11	Industrial, Commercial, & Government Operations
CHEVIOT FURN. FINISHING	62476	5366 ADAMS BLVD LOS ANGELES, CA 90016	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
CHEVRON PRODUCTS COMPANY,SS#20-7669	116144	4000 S FIGUEROA ST LOS ANGELES, CA 90089	447190	Other Gasoline Stations	40	Service Stations
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	447190	Other Gasoline Stations	40	Service Stations
CHICO CARVINGS	156567	615 N ALAMEDA ST COMPTON, CA 90220	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CHOI'S AUTOBODY & REPAIR	189473	2320 W VERNON AVE LOS ANGELES, CA 90008	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CIRCLE INDUSTRIAL MFG CORP	54282	2727 N SLATER AVE COMPTON, CA 90222	333517	Machine Tool Manufacturing	11	Industrial, Commercial, & Government Operations

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CIRCLE K #2709440, CIRCLE K STORES, INC.	169573	2620 S FIGUEROA ST LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations
CIRCLE K STORES INC, SAMER ALI YASSINE S	169357	7130 CRENSHAW BLVD LOS ANGELES, CA 90043	447190	Other Gasoline Stations	40	Service Stations
CIRCLE K STORES, INC., C/O LORENA SANCHE	169269	5776 WASHINGTON BLVD CULVER CITY, CA 90232	447190	Other Gasoline Stations	40	Service Stations
CITY BEAN, INC	159619	5051 W JEFFERSON BLVD LOS ANGELES, CA 90016	311920	Coffee and Tea Manufacturing	11	Industrial, Commercial, & Government Operations
CITY FOAM, D NUNEZ DBA	131795	11110 WRIGHT RD LYNWOOD, CA 90262	326150	Urethane and Other Foam Product (except Polystyrene) Manufacturing	11	Industrial, Commercial, & Government Operations
CITY OF COMPTON	183592	1300 EL SEGUNDO BLVD COMPTON, CA 90222	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
CITY OF COMPTON, CITY YARD	108537	458 S ALAMEDA COMPTON, CA 90220	621498	All Other Outpatient Care Centers	11	Industrial, Commercial, & Government Operations
CITY OF L. A., BUREAU OF SANITATION	144458	4986 1/2 MARTIN LUTHER KING BLVD LOS ANGELES, CA 90031	221320	Sewage Treatment Facilities	58	Toxics and Waste Management
CITY OF LA, BOS, WASTEWATER COLL SYS DIV	6044	520 W MANCHESTER (PP # 601) LOS ANGELES, CA 90044	221320	Sewage Treatment Facilities	11	Industrial, Commercial, & Government Operations
CITY OF LA/BOS,WASTEWATER COLL SYS DIV	140708	3410 S LA CIENEGA PERM ATF, ATF #809 LOS ANGELES, CA 90016	221320	Sewage Treatment Facilities	58	Toxics and Waste Management
CITY OF LOS ANGELES BALDWIN HILLS COMMUN	176050	4170 S PADILLA PL LOS ANGELES, CA 90008	999990	Other	11	Industrial, Commercial, & Government Operations

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CITY OF LYNWOOD (SITE 3, WELL NO. 11)	166056	11645 ESTHER ST LYNWOOD, CA 90262	813990	Other Similar Organizations (except Business, Professional, Labor, and Political Organizations)	11	Industrial, Commercial, & Government Operations
CITY OF LYNWOOD, (SITE 2 WELL NO. 19)	166058	2600 INDUSTRY WAY LYNWOOD, CA 90262	921110	Executive Offices	11	Industrial, Commercial, & Government Operations
CITY OF LYNWOOD, (SITE 4 WELL NO. 9)	166051	3771 CARLIN AVE LYNWOOD, CA 90262	921110	Executive Offices	11	Industrial, Commercial, & Government Operations
CITY OF LYNWOOD, (SITE 5, WELL NO. 22)	166057	3611 E SPRUCE ST LYNWOOD, CA 90262	621111	Offices of Physicians (except Mental Health Specialists)	11	Industrial, Commercial, & Government Operations
CITY OF LYNWOOD, SITE 1 (WELL #8)	166055	11331 BULLIS RD LYNWOOD, CA 90262	624190	Other Individual and Family Services	11	Industrial, Commercial, & Government Operations
CM LAUNDRY, LLC	153702	14919 S FIGUEROA ST GARDENA, CA 90248	313310	Textile and Fabric Finishing Mills	11	Industrial, Commercial, & Government Operations
COLORCRAFT FINISHES	185797	1118 W COMPTON BLVD COMPTON, CA 90220	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
COLORMAX INDUSTRIES INC.	73270	1627 PALOMA ST LOS ANGELES, CA 90021	315190	Other Apparel Knitting Mills	11	Industrial, Commercial, & Government Operations
COMET CLEANERS, INC.	167787	3651 CRENSHAW BLVD LOS ANGELES, CA 90016	81232	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
COMILLA CORP	139763	1010 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations
COMPETENCY COLLISION	174853	1541 W FLORENCE AVE LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
COMPTON COURTHOUSE, JCC/AOC	165243	200 W COMPTON BLVD COMPTON, CA 90220	922110	Courts	11	Industrial, Commercial, & Government Operations
COMPTON STEEL CO, INC	185236	510 E EUCLID AVE COMPTON, CA 90222	236220	Commercial and Institutional Building Construction	11	Industrial, Commercial, & Government Operations
COMPTON UNI SCH DIST, MAINT DIV	48	723 S ALAMEDA COMPTON, CA 90220	611110	Non-Industrial	11	Industrial, Commercial, & Government Operations
CONCERNED CITIZENS OF SO. CENTRAL L A	144690	4827 S CENTRAL AVE LOS ANGELES, CA 90011	813410	Civic and Social Organizations	11	Industrial, Commercial, & Government Operations
CONTINENTAL FORGE CO	20600	512 CARLIN ST COMPTON, CA 90222	332112	Nonferrous Forging	11	Industrial, Commercial, & Government Operations
CONTINENTAL FORGE CO	113497	420 E EL SEGUNDO BLVD COMPTON, CA 90222	332112	Nonferrous Forging	11	Industrial, Commercial, & Government Operations
CONTINENTAL SALES COMPANY	191874	1661 MCGARRY ST LOS ANGELES, CA 90021	424480	Fresh Fruit and Vegetable Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
COOPER & BRAIN, BANK LEASE	39035	600 W 135TH ST LOS ANGELES, CA 90044	211111	Crude Petroleum Extraction	15	Energy
COOPER AND BRAIN INC	63013	13110 ESTRELLA AVE LOS ANGELES, CA 90044	211111	Crude Petroleum Extraction	15	Energy
COOPER AND BRAIN, INC.	149835	13333 S FIGUEROA ST LOS ANGELES, CA 90061	211111	Crude Petroleum Extraction	31	Energy

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COSMOS NEON DESIGN INC	152433	6222 S WILTON PL LOS ANGELES, CA 90047	532490	Other Commercial and Industrial Machinery and Equipment Rental and Leasing	11	Industrial, Commercial, & Government Operations
COSWAY CO INC	53015	14805 S MAPLE ST GARDENA, CA 90248	325620	Toilet Preparation Manufacturing	11	Industrial, Commercial, & Government Operations
COTTON CLUB DRY CLEANERS	149344	3154 W FLORENCE AVE LOS ANGELES, CA 90043	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
COURTESY CLEANERS, M YADEGAR, DBA	121602	1705 E COMPTON BLVD COMPTON, CA 90221	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
CP V CUMULUS LLC	189217	3311 S LA CIENEGA BLVD LOS ANGELES, CA 90016	515111	Radio Networks	11	Industrial, Commercial, & Government Operations
CRASH CHAMPIONS LOS ANGELES	193025	4610 CRENSHAW BLVD LOS ANGELES, CA 90043	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CRENSHAW COLLISION CENTER	183520	6830 S CRENSHAW BLVD LOS ANGELES, CA 90048	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CRENSHAW ENERGY & RETAIL, LLC	167315	5805 CRENSHAW BLVD LOS ANGELES, CA 90043	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
CRENSHAW LAX TRANSIT CORRIDOR	178462	3646 S CRENSHAW BLVD LOS ANGELES, CA 90018	541611	Administrative Management and General Management Consulting Services	11	Industrial, Commercial, & Government Operations
CRENSHAW MEDICAL GROUP, LP	137927	3756 SANTA ROSALIA DR LOS ANGELES, CA 90008	561110	Office Administrative Services	11	Industrial, Commercial, & Government Operations
CRENSHAW OIL/HOSSEIN GHASSEMI	177183	3227 W 54TH ST LOS ANGELES, CA 90043	447190	Other Gasoline Stations	40	Service Stations
CRENSHAW RHF PARTNERS LP	186297	3411- CRENSHAW 3427 BLVD LOS ANGELES, CA 90016	531110	Lessors of Residential Buildings and Dwellings	11	Industrial, Commercial, & Government Operations
CRENSHAW SHELL MINI MART	168130	3645 S CRENSHAW LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
CRENSHAW VILLAS PARTNERS LP	186296	2645 CRENSHAW BLVD LOS ANGELES, CA 90016	531110	Lessors of Residential Buildings and Dwellings	11	Industrial, Commercial, & Government Operations
CRUZ BROTHERS CABINETS	166049	5819 COMPTON AVE LOS ANGELES, CA 90001	811198	All Other Automotive Repair and Maintenance	11	Industrial, Commercial, & Government Operations
CUSTOM FURNITURE & CABINETS, INC.	180135	13930 S FIGUEROA ST LOS ANGELES, CA 90061	238350	Finish Carpentry Contractors	11	Industrial, Commercial, & Government Operations
CUSTOMS BY LOPEZ	154683	13407 S ALAMEDA ST COMPTON, CA 90222	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
DAE EUN INC	106729	2025 S WESTERN AVE LOS ANGELES, CA 90018	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
DAVID'S SERVICE STATION, NAM CHUNG DBA	121298	1404 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90062	447190	Other Gasoline Stations	40	Service Stations
DAVIS & WELLS INC.	43153	11090 S ALAMEDA ST LYNWOOD, CA 90262	423830	Industrial Machinery and Equipment Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
DCX CHOL ENTERPRISES INCORPORATED	192505	12831 S FIGUEROA ST LOS ANGELES, CA 90061	334419	Other Electronic Component Manufacturing	11	Industrial, Commercial, & Government Operations
DDS COLLISION, INC	188244	7511 1/2 S WESTERN AVE LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
DEBORAH & TWINS INC	136641	7600 S WESTERN AVE LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations
DELGADO BROTHERS CO	69598	611-647 E 59TH ST LOS ANGELES, CA 90001	337212	Custom Architectural Woodwork and Millwork Manufacturing	11	Industrial, Commercial, & Government Operations
DELICIOUS PIZZA	176476	5413 W ADAMS LOS ANGELES, CA 90016	722513	Limited-Service Restaurants	31	Area Sources
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	2000 N ALAMEDA ST COMPTON, CA 90222	324191	Petroleum Lubricating Oil and Grease Manufacturing	2	Major Sources

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
DENKER AUTO CENTER	93436	1515 W MARTIN LUTHER KING 1/2 LOS ANGELES, CA 90062	811111	General Automotive Repair	33	Area Sources
DEPARTMENT OF GENERAL SERVICES, FS 65	143288	1801 E CENTURY BLVD WATTS, CA 90002	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
DEPENDABLE REFRIGERATION CO	11506	5225 S CENTRAL AVE LOS ANGELES, CA 90011	811412	Appliance Repair and Maintenance	11	Industrial, Commercial, & Government Operations
DESIGN REALITY	160796	330 W 58TH ST UNIT A LOS ANGELES, CA 90037	337110	Wood Kitchen Cabinet and Countertop Manufacturing	11	Industrial, Commercial, & Government Operations
DESIGNED METAL CONNECTIONS	144198	14800 S FIGUEROA ST GARDENA, CA 90248	332912	Fluid Power Valve and Hose Fitting Manufacturing	11	Industrial, Commercial, & Government Operations
DESIGNERS CHOICE FURNITURE FINISHING INC	107514	5530 W ADAMS BLVD LOS ANGELES, CA 90016	238350	Finish Carpentry Contractors	11	Industrial, Commercial, & Government Operations
DESTINY CHEVRON	164590	101 W COMPTON BLVD COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
DIAMOND SHUTTERS, INC.	168183	8712 METTLER ST LOS ANGELES, CA 90003	238990	All Other Specialty Trade Contractors	11	Industrial, Commercial, & Government Operations
DINO STATION #3	193490	811 S ALAMEDA ST COMPTON, CA 90220	447190	Other Gasoline Stations	40	Service Stations
DOBLES BODY SHOP	132408	5442 MARTIN LUTHER KING JR LYNWOOD, CA 90262	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
DOMESTIC LINEN SUPPLY CO INC	62901	1600 COMPTON AVE LOS ANGELES, CA 90021	812331	Linen Supply	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
DON KELLER COLLISION CENTER	164513	7314 AVALON BLVD LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
DORINGER MANUFACTURING CO INC	100835	13400 E ESTRELLA AVE LOS ANGELES, CA 90248	333991	Power-Driven Handtool Manufacturing	11	Industrial, Commercial, & Government Operations
DOVETAIL FURNITURE	152326	14000 S FIGUEROA ST LOS ANGELES, CA 90061	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
DPSS - EXPOSITION PARK WEST ASSET LEASIN	126835	3833 S VERMONT AVE LOS ANGELES, CA 90037	519120	Libraries and Archives	11	Industrial, Commercial, & Government Operations
DREWELOW REMEDIATION EQUIPMENT INC	141609	5860 S WILTON PL LOS ANGELES, CA 90047	562910	Remediation Services	57	Toxics and Waste Management
DREWELOW REMEDIATION EQUIPMENT, INC.	191723	410 E 32ND ST LOS ANGELES, CA 90011	541620	Environmental Consulting Services	11	Industrial, Commercial, & Government Operations
DUCM INC	136538	801 W EL SEGUNDO BLVD COMPTON, CA 90222	447190	Other Gasoline Stations	40	Service Stations
DUKE REALTY	170001	2700 E IMPERIAL HWY LYNWOOD, CA 90262	531210	Offices of Real Estate Agents and Brokers	11	Industrial, Commercial, & Government Operations
DUKE REALTY LIMITED PARTNERSHIP	189980	13344 S MAIN ST LOS ANGELES, CA 90061	562910	Remediation Services	11	Industrial, Commercial, & Government Operations
DUTKO HARDWOOD FLOORS INC	151292	14116 TOWNE AVE LOS ANGELES, CA 90061	238330	Flooring Contractors	11	Industrial, Commercial, & Government Operations
E & J LEGS & TOOLS, INC.	185847	1125 N STANFORD AVE SUITE #B LOS ANGELES, CA 90059	444130	Hardware Stores	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
E C GROUP, INC	109366	5960 BOWCROFT ST LOS ANGELES, CA 90016	321999	All Other Miscellaneous Wood Product Manufacturing	11	Industrial, Commercial, & Government Operations
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	2126 W ADAMS BLVD LOS ANGELES, CA 90018	211111	Crude Petroleum Extraction	15	Energy
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	431 E OAKS ST COMPTON, CA 90221	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
EARLE M. JORGENSEN CO	124560	1929 MARTIN LUTHER KING BLVD LYNWOOD, CA 90262	423510	Metal Service Centers and Other Metal Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
EARLE'S WEINERS	94048	4326 CRENSHAW BLVD LOS ANGELES, CA 90043	454390	Other Direct Selling Establishments	31	Area Sources
EBENEZER CLEANERS	146649	4219 S MAIN ST LOS ANGELES, CA 90037	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
ECONOMY CLEANERS AND LAUNDRY	173653	5101 S CENTRAL AVE LOS ANGELES, CA 90011	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
EDUARDO ARTEAGA	191152	121 W FLORENCE AVE #3 LOS ANGELES, CA 90003	337110	Wood Kitchen Cabinet and Countertop Manufacturing	11	Industrial, Commercial, & Government Operations
EFI GLOBAL	182579	1247 MANCHESTER AVE LOS ANGELES, CA 90044	561210	Facilities Support Services	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
EFRAIN MEJORADA LOS 3 POLLOS, INC	168173	525 E ROSECRANS AVE COMPTON, CA 90221	722511	Full-Service Restaurants	30	Area Sources
EL POLLO LOCO	130032	4405 S AVALON LOS ANGELES, CA 90011	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO #5914	98127	12800 AVALON BLVD LOS ANGELES, CA 90061	722511	Full-Service Restaurants	30	Area Sources
EL POLLO LOCO # 5975	126877	3350 W VERNON AVE LOS ANGELES, CA 90008	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO #3214	154909	3125 W CENTURY BLVD INGLEWOOD, CA 90303	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO #5349	64542	408 E WASHINGTON BLVD LOS ANGELES, CA 90014	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO #5415	64564	2803 CRENSHAW LOS ANGELES, CA 90016	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO #5531	64420	11118 LONG BEACH BLVD LYNWOOD, CA 90262	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO #5913	83618	101 E COMPTON COMPTON, CA 90220	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO,	70089	1200 MANCHESTER LOS ANGELES, CA 90045	722511	Full-Service Restaurants	31	Area Sources
EL POLLO LOCO, INC, #5972	122820	101 E MANCHESTER LOS ANGELES, CA 90003	722511	Full-Service Restaurants	30	Area Sources
EL POLLO LOCO, INC. #5919	115426	5800 S VERMONT LOS ANGELES, CA 90044	722511	Full-Service Restaurants	30	Area Sources
EL SUPER, BODEGA LATINA CORP.	164606	1100 W SLAUSON AVE LOS ANGELES, CA 90044	445110	Supermarkets and Other Grocery (except Convenience) Stores	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ELECTROLIZING INC	7978	1947 HOOPER AVE LOS ANGELES, CA 90011	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
ELMESIRY, INC SM OIL	170704	1340 E IMPERIAL HWY LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
ELTA PATIO AUTO CENTER & BODY SHOP	132448	15220 S SAN PEDRO ST GARDENA, CA 90248	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
EMERALD TRANSFORMER LOS ANGELES, LLC	186404	5756 ALBA ST LOS ANGELES, CA 90058	45431	Fuel Dealers	56	Toxics and Waste Management
EQUILON ENTERPRISES LLC	185953	449 W IMPERIAL HWY LOS ANGELES, CA 90061	562910	Remediation Services	61	Toxics and Waste Management
EQUILON ENTERPRISES LLC DBA SHELL OIL PR	179552	1553 W MANCHESTER AVE LOS ANGELES, CA 90047	562910	Remediation Services	61	Toxics and Waste Management
EVERGREEN RECYCLING, INC.	164018	8700 CROCKER ST LOS ANGELES, CA 90003	562920	Materials Recovery Facilities	54	Toxics and Waste Management
EVOQUA WATER TECHNOLOGIES LLC	174688	1441 E WASHINGTON BLVD LOS ANGELES, CA 90021	325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing	11	Industrial, Commercial, & Government Operations
EXPOSITION PARK/SIXTH DISTRICT AGRICULTU	188173	3975 S BILL ROBERTSON LN LOS ANGELES, CA 90037	813319	Other Social Advocacy Organizations	11	Industrial, Commercial, & Government Operations
EXPRESS SIGN & NEON	178198	1720 W SLAUSON AVE LOS ANGELES, CA 90047	339950	Sign Manufacturing	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
EXXONMOBIL OIL CORPORATION	165176	3018 W MANCHESTER BLVD INGLEWOOD, CA 90305	562910	Remediation Services	61	Toxics and Waste Management
EXXONMOBIL OIL CORPORATION	173882	1002 E 126TH ST LOS ANGELES, CA 90059	562910	Remediation Services	60	Toxics and Waste Management
EXXONMOBIL OIL CORPORATION	179442	1406 W MANCHESTER AVE LOS ANGELES, CA 90047	562910	Remediation Services	57	Toxics and Waste Management
FABRI COTE	194023	718-24 E 60TH ST LOS ANGELES, CA 90001	33641	Aerospace Product and Parts Manufacturing	5	Industrial, Commercial, & Government Operations
FASHION PASS	191153	15020 S FIGUEROA ST GARDENA, CA 90248	8129	Other Personal Services	11	Industrial, Commercial, & Government Operations
FATBS, LP	192690	3617 AVALON BLVD LOS ANGELES, CA 90011	999990	Other	11	Industrial, Commercial, & Government Operations
FEDERAL AVIATION ADMIN	131677	KENNETH HAHN PK/S LA CIENEGA LOS ANGELES, CA 90008	488111	Air Traffic Control	11	Industrial, Commercial, & Government Operations
FELIPE GARCIA	183196	610 E 59TH ST LOS ANGELES, CA 90001	541990	All Other Professional, Scientific, and Technical Services	11	Industrial, Commercial, & Government Operations
FINAL TOUCH DYEING & FINISHING	129376	13416 ESTRELLA AVE GARDENA, CA 90248	313320	Fabric Coating Mills	11	Industrial, Commercial, & Government Operations
FLORENCE FOOD MART CORP	144403	428 W FLORENCE AVE LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
FLORENCE GAS MART INC	180526	303 W FLORENCE AVE LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
FLORENCE SHELL	149032	605 E FLORENCE LOS ANGELES, CA 90001	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
FLORES CABINETS	138654	5534 BANDERA ST LOS ANGELES, CA 90058	337110	Wood Kitchen Cabinet and Countertop Manufacturing	11	Industrial, Commercial, & Government Operations
FMG PETROLEUM INC	179582	14204 S FIGUEROA ST LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
FONG BROS CO	16622	5731 S ALAMEDA LOS ANGELES, CA 90058	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
FORMER HI-TECH DRY CLEANERS	193523	3417 W SLAUSON AVE LOS ANGELES, CA 90043	81232	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
FORUM ENTERTAINMENT LLC	174554	3900 W MANCHESTER BLVD INGLEWOOD, CA 90305	711310	Promoters of Performing Arts, Sports, and Similar Events with Facilities	11	Industrial, Commercial, & Government Operations
FOSTER FARMS, COMPTON PLANT	160576	1805 N SANTA FE AVE COMPTON, CA 90221	311999	All Other Miscellaneous Food Manufacturing	11	Industrial, Commercial, & Government Operations
FRANK'S DESIGN, INC.	189939	7519 S WESTERN AVE LOS ANGELES, CA 90047	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
FRANZ BAKERY LOS ANGELES	184003	457 E MARTIN LUTHER KING JR. BLVD LOS ANGELES, CA 90011	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
FRED'S BURGERS NO 2	68980	5950 S VERMONT AVE LOS ANGELES, CA 90044	722513	Limited-Service Restaurants	30	Area Sources
FREY ENVIRONMENTAL INC	156870	11320 S MAIN ST LOS ANGELES, CA 90061	562910	Remediation Services	61	Toxics and Waste Management

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
FREY ENVIRONMENTAL INC	189392	8620 S NORMANDIE AVE LOS ANGELES, CA 90044	562910	Remediation Services	61	Toxics and Waste Management
FREY ENVIRONMENTAL, INC	151890	730 E 139TH ST COMPTON, CA 90222	562910	Remediation Services	57	Toxics and Waste Management
FREY ENVIRONMENTAL, INC	193707	2820 E ALONDRA BLVD COMPTON, CA 90221	541620	Environmental Consulting Services	11	Industrial, Commercial, & Government Operations
FREY ENVIRONMENTAL, INC.	185234	378 W 133RD ST LOS ANGELES, CA 90061	541620	Environmental Consulting Services	11	Industrial, Commercial, & Government Operations
G & M OIL CO, LLC #57	111357	4346 E IMPERIAL HWY LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
G & M OIL CO, LLC #79	116025	256 E MANCHESTER AVE LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
G & S STATION, GEHAN KHAFAGY	176766	1359 W CENTURY BLVD LOS ANGELES, CA 90047	447190	Other Gasoline Stations	40	Service Stations
G AND G AUTO BODY SHOP	149176	11104 ALAMEDA ST LYNWOOD, CA 90262	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
G&M OIL CO, LLC #111	131145	3742 S LA BREA AVE LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
G&M OIL CO., #15	189713	3063 CRENSHAW BLVD LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
G&M OIL CO., #56	188707	11000 S ATLANTIC AVE LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
GALINDO CLEANERS	118665	526 W ALONDRA BLVD COMPTON, CA 90220	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
GALINDO'S CLEANERS	126515	817 S LONG BEACH BLVD COMPTON, CA 90220	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
GARDENA SHELL, MOHAMMAD I KASKAS	165049	854 W EL SEGUNDO BLVD GARDENA, CA 90247	447190	Other Gasoline Stations	40	Service Stations
GARNER ENGINEERING INC	144474	810 W 125TH ST LOS ANGELES, CA 90044	211111	Crude Petroleum Extraction	15	Energy
GAS 4 LESS, KARAM ABDALLA DBA	148171	545 E ROSECRANS AVE GARDENA, CA 90248	447190	Other Gasoline Stations	40	Service Stations
GATH'S SMOKEHOUSE BBQ & MEXICAN GRILL	79830	8300 S WESTERN AVE LOS ANGELES, CA 90047	722320	Caterers	31	Area Sources
GEBE ELECTRONIC SERVICES HOLDINGS LLC	191871	4112 W JEFFERSON BLVD LOS ANGELES, CA 90016	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
GENNARO ROSETTI LLC	78970	6833 BRYNHURST LOS ANGELES, CA 90043	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
GILAD INC	193009	8514 S HOOVER 8526 ST LOS ANGELES, CA 90044	447190	Other Gasoline Stations	11	Industrial, Commercial, & Government Operations
GIO AUTO LLC	177323	2633 E 125 TH ST COMPTON, CA 90222	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
GNC CLEANERS	183782	2164 W SLAUSON LOS ANGELES, CA 90047	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
GOLD STAR COLLISION CENTERS, INC.	129516	1062 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
GOLD STAR GAS	191358	1100 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations
GOLDEN BODY AUTO SHOP	178479	227 E FLORENCE AVE LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
GOMEZ WELDING & MFG & IRON WORK,R GOMEZ	132331	6201 S WESTERN AVE LOS ANGELES, CA 90047	238990	All Other Specialty Trade Contractors	11	Industrial, Commercial, & Government Operations
GOODMAN COMPTON	180926	2917 W ROSECRANS AVE LOS ANGELES, CA 90059	531210	Offices of Real Estate Agents and Brokers	11	Industrial, Commercial, & Government Operations
GRAIN CRAFT LLC	179761	1861 E 55TH ST LOS ANGELES, CA 90058	311211	Flour Milling	11	Industrial, Commercial, & Government Operations
GREEN LIGHT MOTORS INC	182909	2819 W FLORENCE AVE LOS ANGELES, CA 90043	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
GREENFIELD INVESTMENTS, LLC	191124	4100 S AVALON BLVD LOS ANGELES, CA 90011	5612	Facilities Support Services	11	Industrial, Commercial, & Government Operations
GUS JR'S RESTAURANT	71216	4001 S SAN PEDRO ST LOS ANGELES, CA 90011	722511	Full-Service Restaurants	31	Area Sources

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
GUTIERREZ ALTERNATOR SHOP,F GUTIERREZ DB	138921	6129 AVALON BLVD LOS ANGELES, CA 90003	811198	All Other Automotive Repair and Maintenance	11	Industrial, Commercial, & Government Operations
GUTIERREZ BODY SHOP	120322	11914 S MAIN ST LOS ANGELES, CA 90061	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
GUZMAN ENERGY	185419	635 ROSECRANS AVE GARDENA, CA 90248	211111	Crude Petroleum Extraction	15	Energy
GUZMAN ENERGY PACIFIC CLARK LEASE	193014	13005 ATHENS WAY LOS ANGELES, CA 90061	211111	Crude Petroleum Extraction	15	Energy
GYM AUTO BODY	192502	1334 W COMPTON BLVD COMPTON, CA 90220	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
H&S ENERGY, LLC. H&S 24	160085	850 W ROSECRANS AVE GARDENA, CA 90247	447190	Other Gasoline Stations	40	Service Stations
HAKIMIANPOUR SANTA MONICA GROUP LLC	188649	3036 CRENSHAW BLVD LOS ANGELES, CA 90016	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
HAKIMIANPOUR SANTA MONICA GROUP LLC	188653	1662 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90062	722511	Full-Service Restaurants	30	Area Sources
HAKIMIANPOUR SANTA MONICA GROUP LLC	188658	4410 S FIGUEROA ST LOS ANGELES, CA 90037	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
HAMILTON INC	164487	6100-06 AVALON BLVD LOS ANGELES, CA 90003	3371	Household and Institutional Furniture and Kitchen Cabinet Manufacturing	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
HAN'S ENTERPRISE INC	142646	5816 S WESTERN AVE LOS ANGELES, CA 90047	447190	Other Gasoline Stations	40	Service Stations
HAWATMEH&HAWATMEH, INC	189641	4380 W ADAMS BLVD LOS ANGELES, CA 90018	447190	Other Gasoline Stations	40	Service Stations
HECTORS WELDING AND IRON WORKS	149300	6527 MCKINLEY AVE #G LOS ANGELES, CA 90001	238120	Structural Steel and Precast Concrete Contractors	11	Industrial, Commercial, & Government Operations
HELICOPTER TECHNOLOGY COMPANY	135952	12902 S BROADWAY LOS ANGELES, CA 90061	336413	Other Aircraft Parts and Auxiliary Equipment Manufacturing	56	Toxics and Waste Management
HELICOPTER TECHNOLOGY COMPANY	170140	14610 S BROADWAY GARDENA, CA 90248	336413	Other Aircraft Parts and Auxiliary Equipment Manufacturing	11	Industrial, Commercial, & Government Operations
HERCULES RESTAURANT SPIROS GABRIEL	82410	2825 E IMPERIAL HWY LYNWOOD, CA 90262	722513	Limited-Service Restaurants	31	Area Sources
HIS LIFE WOODWORKS INC	137138	15107 S MAIN ST GARDENA, CA 90248	337110	Wood Kitchen Cabinet and Countertop Manufacturing	11	Industrial, Commercial, & Government Operations
HISPANIC EXPRESS, INC	171705	1900 S MAIN ST LOS ANGELES, CA 90007	523120	Securities Brokerage	11	Industrial, Commercial, & Government Operations
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	106 N LONG BEACH BLVD COMPTON, CA 90221	447190	Other Gasoline Stations	40	Service Stations
HOLLYWOOD PARK CASINO COMPANY, INC.	124481	3883 W CENTURY BLVD INGLEWOOD, CA 90303	721120	Casino Hotels	11	Industrial, Commercial, & Government Operations
HOME DEPOT #1039	146853	1830 W SLAUSON AVE LOS ANGELES, CA 90047	444110	Home Centers	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
HOOPER & SONS, INC	27405	11913 S COMPTON AVE LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
HOOVER VALERO	154989	9920 S HOOVER ST LOS ANGELES, CA 90044	447190	Other Gasoline Stations	40	Service Stations
HOUSTON VALVE SALES	52568	11201 S SANTA FE AVE LYNWOOD, CA 90262	423830	Industrial Machinery and Equipment Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
HYE JUNG KIM	176634	1017 E WASHINGTON BLVD LOS ANGELES, CA 90022	444120	Paint and Wallpaper Stores	11	Industrial, Commercial, & Government Operations
ICI ARCHITECTURAL MILLWORK	165059	6824 BRYNHURST AVE LOS ANGELES, CA 90043	321918	Other Millwork (including Flooring)	11	Industrial, Commercial, & Government Operations
IMPERIAL BODY SHOP	166861	11151 ATLANTIC AVE LYNWOOD, CA 90262	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
IMPERIAL SHADE & VENETIAN BLIND CO INC	53200	909 E 59TH ST LOS ANGELES, CA 90037	337215	Showcase, Partition, Shelving, and Locker Manufacturing	11	Industrial, Commercial, & Government Operations
INLAND EMPIRE HOLDCO LLC	192859	2501 W ROSECRANS AVE COMPTON, CA 90221	484110	General Freight Trucking, Local	11	Industrial, Commercial, & Government Operations
INNO STAR INC., DARLING CLEANERS	160962	4828 W ADAMS BLVD LOS ANGELES, CA 90016	81232	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
INNOVATIVE AUTO COLLISION	172334	4061 S BROADWAY LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
INSURANCE MASTERS AUTO BODY & REPAIR	193738	2768 MARTIN LUTHER KING JR BLVD LYNWOOD, CA 90262	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
INTERNATIONAL COMPOSITES TECHNOLOGIES IN	166187	1435 S SANTA FE AVE COMPTON, CA 90221	322219	Other Paperboard Container Manufacturing	11	Industrial, Commercial, & Government Operations
J & J IRON AND ORNAMENTAL WORK	155279	1441 EL SEGUNDO BLVD COMPTON, CA 90222	332312	Fabricated Structural Metal Manufacturing	11	Industrial, Commercial, & Government Operations
J B CHEMICAL	139723	14803 SPRING ST GARDENA, CA 90248	325612	Polish and Other Sanitation Good Manufacturing	11	Industrial, Commercial, & Government Operations
J&J AUTO CENTER, MARIO GARCIA	167592	1549 W ADAMS BLVD LOS ANGELES, CA 90007	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
J.B. SPRAY	144414	11633 LOUISE AVE LYNWOOD, CA 90262	238320	Painting and Wall Covering Contractors	11	Industrial, Commercial, & Government Operations
J.R. WELDING, INC.	187130	11116 ALAMEDA ST LYNWOOD, CA 90262	33271	Machine Shops	11	Industrial, Commercial, & Government Operations
JACKSON CAFE	185950	5880 W JEFFERSON BLVD STE B LOS ANGELES, CA 90016	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
JAN'S AUCTIONEERS INC	166612	1898 W ADAMS LOS ANGELES, CA 90018	423990	Other Miscellaneous Durable Goods Merchant Wholesalers	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
JASON'S ARCO & MINI-MART	98105	2211 S HOOVER ST LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations
JEFF'S CLEANERS	82776	2165 W FLORENCE AVE LOS ANGELES, CA 90044	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
JERRY BODY SHOP	158790	9014 S AVALON LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
JESUS AUTO REPAIR	152997	5284 W ADAMS #A LOS ANGELES, CA 90016	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
JEWELL CLEANERS	81974	2432 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90008	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
JIMENEZ BODY SHOP	180004	632 E FLORENCE AVE LOS ANGELES, CA 90001	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
JMP BODY SHOP	176945	4525 STAUNTON AVE LOS ANGELES, CA 90058	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
JOE LEWIS COMPANY	181695	440 E ROSECRANS AVE GARDENA, CA 90248	561499	All Other Business Support Services	11	Industrial, Commercial, & Government Operations
JOHN SERVICE STATION, INC.	146595	105 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations

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JONATHAN LOUIS INTL	47144	544 W 130TH ST GARDENA, CA 90248	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
JONES LUMBER CO INC	6438	10711 S ALAMEDA ST LYNWOOD, CA 90262	444110	Home Centers	11	Industrial, Commercial, & Government Operations
JP & A FURNITURE	146581	1155 N MCKINLEY AVE LOS ANGELES, CA 90059	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
JR BODY SHOP, JOSE A ENCINAS	151042	10801 S ALAMEDA ST UNIT # 1/2 LOS ANGELES, CA 90059	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
JUDICIAL COUNCIL OF CALIF AOC	162334	400 S ACACIA COMPTON, CA 90220	922110	Courts	11	Industrial, Commercial, & Government Operations
JUHASZ INC	21506	4515 W ADAMS BLVD LOS ANGELES, CA 90016	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
JUNIOR AUTO BODY AND SALES	190564	10803 S ALAMEDA 1/2 ST LOS ANGELES, CA 90059	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
JUSTICE DESIGN GROUP LLC	154717	405 E EUCLID AVE COMPTON, CA 90222	331513	Steel Foundries (except Investment)	11	Industrial, Commercial, & Government Operations
KAM ENTERPRISES, LLC	188657	641 W REDONDO BEACH BLVD GARDENA, CA 90247	561499	All Other Business Support Services	11	Industrial, Commercial, & Government Operations
KEDREN COMMUNITY HEALTH CENTER, INC.	143058	4211 S AVALON BLVD LOS ANGELES, CA 90011	622210	Psychiatric and Substance Abuse Hospitals	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
KIM'S MOBIL INC	174744	1803 W MANCHESTER BLVD LOS ANGELES, CA 90047	447190	Other Gasoline Stations	40	Service Stations
KNM AUTO SALES, INC.	184000	3443 W 43RD ST LOS ANGELES, CA 90008	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
KOREAN FAST FOOD	73668	2102 N LONG BEACH BLVD COMPTON, CA 90221	445110	Supermarkets and Other Grocery (except Convenience) Stores	30	Area Sources
L & J DRY CLEANING, ALFRED HOWELL DBA	42127	1601-03 W MANCHESTER BLVD LOS ANGELES, CA 90047	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
L A CO.,DEPT OF PUBLIC WORKS, AVIATION	1745	901 W ALONDRA BLVD COMPTON, CA 90220	921110	Executive Offices	11	Industrial, Commercial, & Government Operations
L A CO.,SANITATION DIST, COMPTON FIELD O	15667	920 S ALAMEDA ST COMPTON, CA 90221	221320	Sewage Treatment Facilities	11	Industrial, Commercial, & Government Operations
L A UNI SCH DIST/ JEFFERSON PRIM CTR #6	141777	3601 S MAPLE AVE LOS ANGELES, CA 90011	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
L.A. COUNTY ADMINISTRATION BUILDING	148475	8300 S VERMONT AVE LOS ANGELES, CA 90044	424210	Drugs and Druggists' Sundries Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
L.A. SANI FELT CO	25518	830 E 59TH ST LOS ANGELES, CA 90001	314999	All Other Miscellaneous Textile Product Mills	11	Industrial, Commercial, & Government Operations
L.A. SANI-FELT CO INC	71955	730 E 60TH ST LOS ANGELES, CA 90001	314999	All Other Miscellaneous Textile Product Mills	11	Industrial, Commercial, & Government Operations

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LA CATERING TRUCK MFG., INC	136676	6901 S STANDFORD LOS ANGELES, CA 90001	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
LA CIENEGA JEFFERSON TOWERS 1, LLC.	184303	5790 W JEFFERSON BLVD LOS ANGELES, CA 90016	562910	Remediation Services	60	Toxics and Waste Management
LA CITY DEPT OF GEN SERVICES, BALDWIN HL	118285	4203 S LA BREA AVE LOS ANGELES, CA 90008	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CITY DWP, BALDWIN HILL PS	68717	4401 S LA BREA AVE LOS ANGELES, CA 90008	926130	Regulation and Administration of Communications, Electric, Gas, and Other Utilities	11	Industrial, Commercial, & Government Operations
LA CITY DWP, MANHATTAN WELLS AMMONIATION	173372	6219 S MANHATTAN PL LOS ANGELES, CA 90047	221310	Water Supply and Irrigation Systems	53	Toxics and Waste Management
LA CITY, 77TH ST AREA POLICE FACILITY	106355	7600 BROADWAY LOS ANGELES, CA 90003	621999	All Other Miscellaneous Ambulatory Health Care Services	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVICES	7999	145 W 108TH ST LOS ANGELES, CA 90061	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVICES	9252	2801 EXPOSITION BLVD LOS ANGELES, CA 90018	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVICES	18793	5860 S WILTON PL LOS ANGELES, CA 90047	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
LA CITY, DEPT OF GEN SERVICES	28689	1546 MARTIN LUTHER KING BLVD LOS ANGELES, CA 90062	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVICES	68822	7510 S FIGUEROA ST LOS ANGELES, CA 90003	926120	Regulation and Administration of Transportation Programs	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVICES	71924	4201 S LA BREA AVE LOS ANGELES, CA 90008	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVICES	73683	4206 S MAIN ST LOS ANGELES, CA 90037	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVS. FIRE STA #94	72174	4470 COLISEUM ST LOS ANGELES, CA 90016	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SERVS/SO CENTRAL-CO	130214	8475 S VERMONT AVE LOS ANGELES, CA 90044	923130	Administration of Human Resource Programs (except Education, Public Health, and Veterans' Affairs Programs)	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GEN SVC - FIRE STN 21	148464	1192 E 51ST ST LOS ANGELES, CA 90011	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
LA CITY, DEPT OF GENERAL SERVICES	107428	3400 S CENTRAL AVE LOS ANGELES, CA 90011	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
LA CO DEPT OF PUBLIC WORKS - FLOOD MAINT	170810	CENTURY FWY & LG BCH FWY, WEST SIDE OF LA	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations

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		RIVER LYNWOOD, CA 90262				
LA CO SHERIFF'S DEPT, FAC SERVS BUREAU	138071	301 S WILLOWBROOK AVE COMPTON, CA 90220	922120	Police Protection	11	Industrial, Commercial, & Government Operations
LA CO, DPW WATERWORKS/SEWER MAINT DIV	3369	1129 E 59TH ST LOS ANGELES, CA 90001	221320	Sewage Treatment Facilities	11	Industrial, Commercial, & Government Operations
LA CO., DPSS/METRO SPECIAL DIST.NO 70	5419	2707 S GRAND & 247 W 28TH AVE LOS ANGELES, CA 90007	923130	Administration of Human Resource Programs (except Education, Public Health, and Veterans' Affairs Programs)	32	Area Sources
LA CO., H. HUMPHREY COMPREHENSIVE HEALTH	15179	5850 S MAIN ST LOS ANGELES, CA 90003	621498	All Other Outpatient Care Centers	11	Industrial, Commercial, & Government Operations
LA CO., HUDSON COMPREHENSIVE HEALTH CTR	16305	2829 S GRAND AVE LOS ANGELES, CA 90007	621111	Offices of Physicians (except Mental Health Specialists)	11	Industrial, Commercial, & Government Operations
LA CO., LYNWOOD REGIONAL JUSTICE CTR	73327	11705 S ALAMEDA ST LYNWOOD, CA 90262	922110	Courts	11	Industrial, Commercial, & Government Operations
LA CO., METROPOLITAN TRANS AUTHORITY	67869	5425 S VAN NESS AVE DIV 5 LOS ANGELES, CA 90062	485113	Bus and Other Motor Vehicle Transit Systems	11	Industrial, Commercial, & Government Operations
LA CO., METROPOLITAN TRANS AUTHORITY	79946	2000 E IMPERIAL HWY LOS ANGELES, CA 90059	488999	All Other Support Activities for Transportation	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
LA CO., METROPOLITAN TRANS AUTHORITY #2	22265	720 E 15TH ST LOS ANGELES, CA 90021	485113	Bus and Other Motor Vehicle Transit Systems	11	Industrial, Commercial, & Government Operations
LA CO., MUSEUM OF NATURAL HISTORY	12056	900 W EXPOSITION BLVD LOS ANGELES, CA 90007	923110	Administration of Education Programs	11	Industrial, Commercial, & Government Operations
LA COUNTY METROPOLITAN TRANSPORTATION AU	167754	1820 S FLOWER ST LOS ANGELES, CA 90015	485113	Bus and Other Motor Vehicle Transit Systems	11	Industrial, Commercial, & Government Operations
LA TRADE TECH COLL, LA COMMUNITY COLL	12989	400 W WASHINGTON BLVD. LOS ANGELES, CA 90015	611210	Junior Colleges	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST - LOS ANGELES ACADEMY MS	111177	644 E 56TH ST LOS ANGELES, CA 90011	611699	All Other Miscellaneous Schools and Instruction	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, AUDUBON MIDDLE SCHOOL	72678	4120 11TH AVE LOS ANGELES, CA 90008	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, BRET HARTE JUNIOR HIGH	72672	9301 S HOOVER ST LOS ANGELES, CA 90044	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, BSC BUS GARAGE	7937	604 E 15TH ST LOS ANGELES, CA 90021	511210	Software Publishers	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, CRENSHAW HIGH SCHOOL	11297	5010 11TH AVE LOS ANGELES, CA 90043	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, HYDE PARK BL SCHOOL	72752	3140 HYDE PARK BLVD LOS ANGELES, CA 90043	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, KING DREW MED	131418	1601 E 120TH ST LOS ANGELES, CA 90059	621111	Offices of Physicians (except Mental Health Specialists)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
LA UNI SCH DIST, MANN MIDDLE SCHOOL	1629	7001 S SAINT ANDREWS PL LOS ANGELES, CA 90047	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, MARKHAM INTERMED SCH	19852	1650 E 104TH ST LOS ANGELES, CA 90002	611110	Elementary and Secondary Schools	31	Area Sources
LA UNI SCH DIST, MARLTON SCHOOL	72790	4000 SANTO TOMAS DR LOS ANGELES, CA 90008	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, NORMANDIE ELEMENTARY	72851	4505 S RAYMOND AVE LOS ANGELES, CA 90037	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, TWENTY-EIGHTH ST ES	72776	2807 STANFORD AVE LOS ANGELES, CA 90011	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LA UNI SCH DIST, WESTERN AVE ELEMENTARY	72852	17424 W 53RD ST LOS ANGELES, CA 90062	722513	Limited-Service Restaurants	31	Area Sources
LA UNIFIED DIST, FRIEDMAN OCCUPATION CTR	72772	1646 S OLIVE ST LOS ANGELES, CA 90015	611519	Other Technical and Trade Schools	11	Industrial, Commercial, & Government Operations
LA USD - BENNEKER BENJAMIN SCHOOL	82909	14024 S SAN PEDRO ST LOS ANGELES, CA 90061	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LAMINATION LTD.	124031	5417 MCKINLEY AVE LOS ANGELES, CA 90011	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
LA-RICS CCB LMR	183902	200 W COMPTON BLVD COMPTON, CA 90220	922150	Parole Offices and Probation Offices	11	Industrial, Commercial, & Government Operations
LAUREL PLACE WEST HOLLYWOOD	167652	535 W 41ST ST LOS ANGELES, CA 90037	531311	Residential Property Managers	11	Industrial, Commercial, & Government Operations
LAUSD, ENERGY UNIT M&O	163853	1420 E ADAMS BLVD LOS ANGELES, CA 90011	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
LDJ FURNITURE	179693	738 E 59TH ST LOS ANGELES, CA 90001	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations

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LEAL POWDER COATING EXPRESS	146739	6615 8TH AVE LOS ANGELES, CA 90043	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
LEE'S ARCO	182885	5804 S CRENSHAW BLVD LOS ANGELES, CA 90043	447190	Other Gasoline Stations	40	Service Stations
LEMUS DESIGN MFG, SERGIO LEMUS DBA	138648	1412 W SLAUSON LOS ANGELES, CA 90047	238350	Finish Carpentry Contractors	11	Industrial, Commercial, & Government Operations
LEON'S AUTO WKS INC	9234	1600 W FLORENCE AVE LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
LIBERTY UTILITIES (PARK WATER) CORP	181656	1734 E 118TH ST COMPTON, CA 90220	221310	Water Supply and Irrigation Systems	11	Industrial, Commercial, & Government Operations
LITE EXTRUSIONS MFG INC	134465	15025 S MAIN ST GARDENA, CA 90248	326130	Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing	11	Industrial, Commercial, & Government Operations
LITTLE CRAFTS	17453	2225 SOUTHWEST DR LOS ANGELES, CA 90043	541890	Other Services Related to Advertising	11	Industrial, Commercial, & Government Operations
LOPEZ INTERIORS	162562	6308 S BROADWAY LOS ANGELES, CA 90003	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
LOS ANGELES AUTO BODY CENTER	128108	4606 W ADAMS BLVD LOS ANGELES, CA 90016	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
LOS ANGELES CHILD GUIDANCE CLINIC	133960	3031 S VERMONT AVE LOS ANGELES, CA 90007	624110	Child and Youth Services	11	Industrial, Commercial, & Government Operations
LOS ANGELES CITY, DEPT GEN SVCS, FS #64	153967	10811 S MAIN ST LOS ANGELES, CA 90061	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
LOS ANGELES CNTY FIRE DEPT, FIRE STN 147	149237	3161 E IMPERIAL HWY LYNWOOD, CA 90262	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
LOS ANGELES COUNTY METROPOLITAN TRANSPOR	167040	417 W 37TH ST LOS ANGELES, CA 90012	485113	Bus and Other Motor Vehicle Transit Systems	11	Industrial, Commercial, & Government Operations
LOS ANGELES COUNTY,DEPT OF PUBLIC WORKS	93876	CENTURY FREEWAY AT LONG BEACH PARAMOUNT, CA 90723	921110	Executive Offices	11	Industrial, Commercial, & Government Operations
LOS ANGELES FASHION CTR.	145432	1458 SAN PEDRO ST LOS ANGELES, CA 90015	448120	Women's Clothing Stores	11	Industrial, Commercial, & Government Operations
LOS ANGELES TRADE TECH COLLEGE	151990	2001 S OLIVE ST LOS ANGELES, CA 90007	611210	Junior Colleges	11	Industrial, Commercial, & Government Operations
LOS ANGELES TRADE TECHNICAL COLLEGE	156351	2215 S GRAND AVE LOS ANGELES, CA 90007	561499	All Other Business Support Services	11	Industrial, Commercial, & Government Operations
LOS ANGELES TRADE TECHNICAL COLLEGE	182824	245 W 24TH ST LOS ANGELES, CA 90007	451211	Book Stores	11	Industrial, Commercial, & Government Operations
LOUI'S BURGERS #2 G KOTROTSOS ETC DBA	71999	1501 E ROSECRANS BLVD COMPTON, CA 90221	722513	Limited-Service Restaurants	31	Area Sources
LR ENVIRONMENTAL EQUIPMENT CO INC	151904	12828 S SPRING ST LOS ANGELES, CA 90061	423830	Industrial Machinery and Equipment Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
LS PETROLEUM INC	140850	1403 W ADAMS AVE LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
LUIS BODY SHOP	150573	821 W FLORENCE AVE LOS ANGELES, CA 90044	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
LUXURIOUS PROPERTIES LLC	188397	6224 S FIGUEROA ST LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
LYNWOOD 76	178032	3501 E MARTIN LUTHER KING BLVD LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
LYNWOOD ARCO	140955	12131 LONG BEACH BLVD LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
LYNWOOD PETROLEUM, INC.	105544	11401 S ATLANTIC AVE LYNWOOD, CA 90262	447190	Other Gasoline Stations	40	Service Stations
M & M GAS STATION & MINI MART	133117	343 W GAGE AVE LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
M&O AREA S1	191955	6620 11TH AVE LOS ANGELES, CA 90043	561499	All Other Business Support Services	11	Industrial, Commercial, & Government Operations
MAGIK AUTO BODY CORP	191537	737 E WASHINGTON BLVD LOS ANGELES, CA 90021	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
MAGNESIUM ALLOY PROD. CO	10132	2400-20 N ALAMEDA ST COMPTON, CA 90222	331529	Other Nonferrous Metal Foundries (except Die-Casting)	11	Industrial, Commercial, & Government Operations
MAGNOLIA CLEANERS	91869	12130 LONG BEACH 1/2 BLVD LYNWOOD, CA 90262	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
MAGUIRE PARTNERS-17TH & GRAND LLC	81880	240 W VENICE BLVD LOS ANGELES, CA 90015	531120	Lessors of Nonresidential Buildings (except Miniwarehouses)	11	Industrial, Commercial, & Government Operations
MAIN ELECTRIC SUPPLY COMPANY	166957	6700 S MAIN ST LOS ANGELES, CA 90003	423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
MAIN ST. FUELS, INC., MAIN ST. FUELS DBA	181647	1516 S MAIN ST LOS ANGELES, CA 90015	447190	Other Gasoline Stations	40	Service Stations
MAIN STREET VALERO	154188	11321 S MAIN ST LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
MALIBU CITY AUTO BODY	171972	4921 JEFFERSON BLVD LOS ANGELES, CA 90016	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
MARINA SHELL #1	177549	1541 S CENTRAL AVE LOS ANGELES, CA 90021	447190	Other Gasoline Stations	40	Service Stations
MARQUEZ SERVICE STATION	143070	2603 S CENTRAL ST LOS ANGELES, CA 90011	447190	Other Gasoline Stations	40	Service Stations
MARTIN CONTAINER SERVICE	68559	1400 S ATLANTIC AVE COMPTON, CA 90221	531130	Lessors of Miniwarehouses and Self-Storage Units	11	Industrial, Commercial, & Government Operations
MARTIN LUTHER KING JR MEDICAL CAMPUS	2619	12021 S WILMINGTON AVE LOS ANGELES, CA 90059	622110	General Medical and Surgical Hospitals	5	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
MARTIN LUTHER KING JR MEDICAL OFFICE BLD	188346	12021 WILMINGTON AVE LOS ANGELES, CA 90059	621111	Offices of Physicians (except Mental Health Specialists)	11	Industrial, Commercial, & Government Operations
MASTER CAR AUTO BODY SHOP	179135	5801 S CENTRAL AVE UNIT G LOS ANGELES, CA 90011	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
MASTER FINISH	130278	6826 CRENSHAW BLVD LOS ANGELES, CA 90043	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
MATCHMASTER DYEING & FINISHING INC	3029	3700 S BROADWAY AVE LOS ANGELES, CA 90007	313310	Textile and Fabric Finishing Mills	4	Major Sources
MAX'S CLEANERS, HONG JIN LEE	159327	7124 S VERMONT AVE LOS ANGELES, CA 90044	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
MAYA STEEL FABRICATIONS INC	60284	301 E COMPTON BLVD GARDENA, CA 90248	332312	Fabricated Structural Metal Manufacturing	11	Industrial, Commercial, & Government Operations
MCI/VERIZON	73381	2300 S CENTRAL AVE COMPTON, CA 90220	517911	Telecommunications Resellers	11	Industrial, Commercial, & Government Operations
MEADOW FARMS SAUSAGE CO INC	1918	6215 S WESTERN AVE LOS ANGELES, CA 90047	311612	Meat Processed from Carcasses	11	Industrial, Commercial, & Government Operations
MELIK DYE WORKS	182774	710 W 58TH ST LOS ANGELES, CA 90037	313320	Fabric Coating Mills	11	Industrial, Commercial, & Government Operations
MENOS AUTO BODY REPAIR	193056	4705 S NORMANDIE AVE LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
MERCADO LA PALOMA, L. MADUENO, DBA	125239	3655 S GRAND AVE LOS ANGELES, CA 90007	445110	Supermarkets and Other Grocery (except Convenience) Stores	30	Area Sources
METAL IMPROVEMENT CO	104509	2588 INDUSTRY WAY STE A LYNWOOD, CA 90262	332811	Metal Heat Treating	11	Industrial, Commercial, & Government Operations
METROPOLITAN COURTHOUSE, JCC/AOC	174216	1945 S HILL ST LOS ANGELES, CA 90007	921110	Executive Offices	11	Industrial, Commercial, & Government Operations
MIDWEST FINISHES	155789	5810 S NORMANDIE #1C LOS ANGELES, CA 90044	238350	Finish Carpentry Contractors	11	Industrial, Commercial, & Government Operations
MILLER'S CLEANERS	93019	2339 W ROSECRANS AVE LOS ANGELES, CA 90059	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
MILLS IRON WKS INC	9095	14834 S MAPLE AVE GARDENA, CA 90248	332919	Other Metal Valve and Pipe Fitting Manufacturing	11	Industrial, Commercial, & Government Operations
MIXOGRAFIA WORKSHOP INC	71588	1419 E ADAMS BLVD LOS ANGELES, CA 90011	424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
MLK-BEHAVIORAL HEALTH CENTER	192388	12021 S WILMINGTON AVE LOS ANGELES, CA 90059	621999	All Other Miscellaneous Ambulatory Health Care Services	11	Industrial, Commercial, & Government Operations
MODERN AUTO BODY SHOP	8546	2202 E ROSECRANS AVE COMPTON, CA 90221	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
MONTEBELLO COLLISION CENTER	162044	750 W WASHINGTON BLVD MONTEBELLO, CA 90640	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
MONTES BODY, MARUYN MONTES DBA	152183	6715 MCKINLEY AVE LOS ANGELES, CA 90001	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
MORRELL'S ELECTRO PLATING, INC	136913	432-36 E EUCLID AVE COMPTON, CA 90222	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
MORTON'S OF CHICAGO	128920	735 S FIGUEROA LOS ANGELES, CA 90003	722511	Full-Service Restaurants	31	Area Sources
MOUNT ST MARY'S COLLEGE - DOHENY CAMPUS	86890	3-10 CHESTER PL LOS ANGELES, CA 90007	611310	Colleges, Universities, and Professional Schools	11	Industrial, Commercial, & Government Operations
MOUNT ST. MARY'S COLLEGE	141045	10 CHESTER PL BLDG #11/FOOD SERVICE DEPT LOS ANGELES, CA 90007	611310	Colleges, Universities, and Professional Schools	11	Industrial, Commercial, & Government Operations
MR KOOL'S COLLISION	189943	4351 S BROADWAY LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
MR WILLIAM LITTLE	172522	12150 S ALAMEDA ST LYNWOOD, CA 90262	562910	Remediation Services	61	Toxics and Waste Management
MULLIGAN'S/MULLIGAN' S PRIMITIVE	172048	5055 JEFFERSON BLVD LOS ANGELES, CA 90016	3371	Household and Institutional Furniture and	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
				Kitchen Cabinet Manufacturing		
MUSE SHOP	180790	200 W 146TH ST GARDENA, CA 90248	453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)	11	Industrial, Commercial, & Government Operations
MY UNCLE'S CLEANERS	187129	2724 MANCHESTER BLVD INGLEWOOD, CA 90305	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
NATL SANDBLASTING CO INC	3985	7101-7105 S MCKINLEY AVE LOS ANGELES, CA 90001	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
NATURAL HISTORY MUSEUM LA	71864	900 EXPOSITION BLVD LOS ANGELES, CA 90007	712110	Museums	11	Industrial, Commercial, & Government Operations
NESTLE WATERS NORTH AMERICA INC	144422	1925 COMPTON AVE LOS ANGELES, CA 90011	312112	Bottled Water Manufacturing	11	Industrial, Commercial, & Government Operations
NETWORK AUTO BODY, INC	170418	3917- S BROADWAY 3923 ST LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
NEW CINGULAR WIRELESS PCS	177406	6318 S VERMONT AVE LOS ANGELES, CA 90044	517210	Wireless Telecommunications	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
				Carriers (except Satellite)		
NEW CINGULAR WIRELESS PCS, AT&T MOBILITY	143556	6049 S WESTERN AVE #A LOS ANGELES, CA 90047	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
NEW CINGULAR WIRELESS PCS, AT&T MOBILITY	143573	4619 1/2 S BROADWAY BLVD LOS ANGELES, CA 90037	443142	Electronics Stores	11	Industrial, Commercial, & Government Operations
NEW CINGULAR WIRELESS PCS, LLC DBA AT&T	182766	9803 AVALON BLVD LOS ANGELES, CA 90003	445299	All Other Specialty Food Stores	11	Industrial, Commercial, & Government Operations
NEWMAN FREY ASSOCIATES INC	137466	4917 W JEFFERSON BLVD LOS ANGELES, CA 90016	337127	Institutional Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
NICOLAS AGUIRRE	99517	5707 ALBA ST LOS ANGELES, CA 90058	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
NIETO'S STATION	160499	11025 S FIGUEROA ST LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
NIKRAD ENTERPRISES INC	118537	1400 W FLORENCE AVE LOS ANGELES, CA 90047	447190	Other Gasoline Stations	40	Service Stations
NIKRAD ENTERPRISES INC #1	103838	3411 W FLORENCE AVE LOS ANGELES, CA 90043	447190	Other Gasoline Stations	40	Service Stations
NIKRAD ENTERPRISES INC #5	115702	2545 S CRENSHAW LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
NITRO COLLISION	145090	1219 S ALAMEDA ST COMPTON, CA 90220	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
NOBLE'S AUTO BODY SHOP	179602	815 W FLORENCE AVE LOS ANGELES, CA 90044	81111	Automotive Mechanical and Electrical Repair and Maintenance	11	Industrial, Commercial, & Government Operations
NOIR TRADING, INC.	175119	14500 S BROADWAY ST GARDENA, CA 90248	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
NORMANDIE CLEANERS, LAURA NAJERA	124794	1501 W JEFFERSON BLVD LOS ANGELES, CA 90061	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
NORTHGATE MARKET	175570	944 E SLAUSON AVE LOS ANGELES, CA 90001	541613	Marketing Consulting Services	11	Industrial, Commercial, & Government Operations
OASIS IMPORTS	128937	8619 CROCKER ST LOS ANGELES, CA 90003	337127	Institutional Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
OMEGA CINEMA PROPS	191163	1515 E 15TH ST LOS ANGELES, CA 90021	32199	All Other Wood Product Manufacturing	11	Industrial, Commercial, & Government Operations
ONE WAY AUTO BODY INC	166442	2917 W JEFFERSON BLVD LOS ANGELES, CA 90018	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ORIGINAL BODY SHOP, SALVADOR CABEZAS COR	187104	3000 N ALAMEDA ST COMPTON, CA 90222	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ORNAMENTAL IRONWORKS	91189	11221 S ALAMEDA ST LOS ANGELES, CA 90059	332323	Ornamental and Architectural Metal Work Manufacturing	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ORTHOPAEDIC HOSP	13031	2400 S FLOWER ST LOS ANGELES, CA 90007	621111	Offices of Physicians (except Mental Health Specialists)	11	Industrial, Commercial, & Government Operations
ORTHOPAEDIC HOSPITAL OUTPATIENT CLINIC	136992	2501 S HOPE ST LOS ANGELES, CA 90007	622110	General Medical and Surgical Hospitals	11	Industrial, Commercial, & Government Operations
ORTHOPAEDIC INSTITUTE FOR CHILDREN	181275	403 W ADAMS BLVD LOS ANGELES, CA 90007	621111	Offices of Physicians (except Mental Health Specialists)	11	Industrial, Commercial, & Government Operations
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	1501 N TAMARIND AVE COMPTON, CA 90222	324122	Asphalt Shingle and Coating Materials Manufacturing	2	Major Sources
P.T.R. LLC	179282	1129 W WASHINGTON BLVD LOS ANGELES, CA 90015	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
PACIFIC BELL, AT&T CALIFORNIA	7176	6900 S VERMONT AVE LOS ANGELES, CA 90044	517911	Telecommunications Resellers	11	Industrial, Commercial, & Government Operations
PACIFIC BELL, AT&T CALIFORNIA	9089	608 E COMPTON BLVD COMPTON, CA 90221	237210	Land Subdivision	11	Industrial, Commercial, & Government Operations
PACIFIC BELL, AT&T CALIFORNIA, DBA	15927	1935 W ADAMS BLVD LOS ANGELES, CA 90018	517911	Telecommunications Resellers	11	Industrial, Commercial, & Government Operations
PACIFIC BELL, AT&T CALIFORNIA, DBA	24842	1900 S GRAND AVE LOS ANGELES, CA 90007	517911	Telecommunications Resellers	11	Industrial, Commercial, & Government Operations
PACIFIC BELL, AT&T DBA	38414	10600 S VERMONT AVE LOS ANGELES, CA 90044	517911	Telecommunications Resellers	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
PACIFIC LIGHTING & STANDARDS CO.	193388	2831 LOS FLORES BLVD LYNWOOD, CA 90262	335122	Commercial, Industrial, and Institutional Electric Lighting Fixture Manufacturing	11	Industrial, Commercial, & Government Operations
PACIFIC PIPELINE SYSTEM, LLC.	118953	2552 FERNWOOD AVE LYNWOOD, CA 90262	48691	Pipeline Transportation of Refined Petroleum Products	82	Energy
PACIFIC SINTERED METALS	43119	14000 AVALON BLVD LOS ANGELES, CA 90061	332117	Powder Metallurgy Part Manufacturing	11	Industrial, Commercial, & Government Operations
PALMER FLOWER STREET PROPERTIE - LORENZO	171844	325 W ADAMS BLVD LOS ANGELES, CA 90007	531312	Nonresidential Property Managers	11	Industrial, Commercial, & Government Operations
PANROSE CORPORATION, INC.	166842	1317 E WASHINGTON BLVD LOS ANGELES, CA 90021	447190	Other Gasoline Stations	40	Service Stations
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	828 S LONG BEACH BLVD COMPTON, CA 90221	447190	Other Gasoline Stations	40	Service Stations
PARAMOUNT UNI SCH DIST	20368	8555 FLOWER ST PARAMOUNT, CA 90723	611110	Elementary and Secondary Schools	11	Industrial, Commercial, & Government Operations
PARK LANE CLEANERS	193564	3574 S LA CIENEGA BLVD LOS ANGELES, CA 90016	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
PARK STEEL COMPANY INC	54177	515 E PINE AVE COMPTON, CA 90222	332312	Fabricated Structural Metal Manufacturing	11	Industrial, Commercial, & Government Operations
PARKLANE CLEANERS	100918	4255 S VERMONT AVE LOS ANGELES, CA 90037	812320	Drycleaning and Laundry Services	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
				(except Coin-Operated)		
PARKLANE CLEANERS, REMON ENT INC DBA	137329	8455 S VERMONT AVE LOS ANGELES, CA 90044	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
PAUL FERRANTE INC	134618	5871 RODEO RD LOS ANGELES, CA 90016	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
PCH OIL ENTERPRISE, INC	178023	3100 W MANCHESTER BLVD INGLEWOOD, CA 90305	447190	Other Gasoline Stations	40	Service Stations
PEACE THEOLOGICAL SEMINARY & COLLEGE	110585	3500 W ADAMS BLVD LOS ANGELES, CA 90018	611310	Colleges, Universities, and Professional Schools	31	Area Sources
PERFECT PAINT & BODY	143923	9640 S VERMONT AVE LOS ANGELES, CA 90044	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
PERFORMANCE COMPOSITES, INC	140552	1418-1518 S. ALAMEDA ST COMPTON, CA 90221	325211	Plastics Material and Resin Manufacturing	5	Industrial, Commercial, & Government Operations
PERI LAUNDRY, INC	183663	4572 1/2 W ADAMS BLVD LOS ANGELES, CA 90016	812310	Coin-Operated Laundries and Drycleaners	11	Industrial, Commercial, & Government Operations
PETE'S BURGERS	75917	2400 S HOOVER LOS ANGELES, CA 90007	722513	Limited-Service Restaurants	31	Area Sources
PHILLIPS 66 COMPANY	171527	13900 S BROADWAY LOS ANGELES, CA 90061	562910	Remediation Services	61	Toxics and Waste Management

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
PHILLIPS 66 COMPANY LOS ANGELES LUBRICAN	171575	13707 S BROADWAY LOS ANGELES, CA 90061	48691	Pipeline Transportation of Refined Petroleum Products	82	Energy
PHILLIPS 66 PIPELINE LLC	171326	13500 S BROADWAY LOS ANGELES, CA 90061	424710	Petroleum Bulk Stations and Terminals	82	Energy
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	2619 S CRENSHAW BLVD LOS ANGELES, CA 90016	722511	Full-Service Restaurants	31	Area Sources
PHR LA MART LLC	186775	1933 S BROADWAY LOS ANGELES, CA 90007	424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
PICO VALET SRVCS/FLORA J CORPORATION DBA	143065	5852 W ADAMS BLVD CULVER CITY, CA 90232	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
PIDLUK INC	177666	4424 S CENTRAL AVE LOS ANGELES, CA 90011	447190	Other Gasoline Stations	40	Service Stations
PLANNED PARENTHOOD LOS ANGELES	156787	400 W 30TH ST LOS ANGELES, CA 90007	621410	Family Planning Centers	11	Industrial, Commercial, & Government Operations
PLEX ART, INC.	153466	13010 S BROADWAY LOS ANGELES, CA 90001	451120	Hobby, Toy, and Game Stores	11	Industrial, Commercial, & Government Operations
POLO'S AUTO BODY SHOP	69578	7813 S BROADWAY ST LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
POWER RUN OIL, LLC	169812	249 E REDONDO BEACH BLVD LOS ANGELES, CA 90026	211111	Crude Petroleum Extraction	31	Energy

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
POWER RUN OIL, LLC (HOWARD)	169844	1442 W 129TH ST (HOWARD) LOS ANGELES, CA 90047	211111	Crude Petroleum Extraction	31	Energy
PRESTIGE AUTO BODY & PAINT	189445	10700 S FIGUEROA ST LOS ANGELES, CA 90061	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
PROCESSES BY MARTIN INC	22229	12150 S ALAMEDA ST LYNWOOD, CA 90262	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
PROGRESSIVE HOME FOR THE ELDERLY	150577	7010 S DENVER AVE LOS ANGELES, CA 90044	531110	Lessors of Residential Buildings and Dwellings	11	Industrial, Commercial, & Government Operations
PRUDENTIAL LIGHTING CORP	22642	1774 E 21ST ST LOS ANGELES, CA 90058	335122	Commercial, Industrial, and Institutional Electric Lighting Fixture Manufacturing	11	Industrial, Commercial, & Government Operations
PUEBLA WELDING, INC.	139671	6615 S 8TH AVE LOS ANGELES, CA 90043	238990	All Other Specialty Trade Contractors	11	Industrial, Commercial, & Government Operations
QAP METAL FINISHING	182848	350 W 130TH ST LOS ANGELES, CA 90061	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	74	Toxics and Waste Management
QUALITY CLEANERS, ELIAS ZACARIAS DBA	147644	7303 S SAN PEDRO ST LOS ANGELES, CA 90003	812320	Drycleaning and Laundry Services	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
				(except Coin-Operated)		
QUINO'S BODY SHOP	58155	1540 W ADAMS ST LOS ANGELES, CA 90007	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
RADISSON HOTEL	128925	3540 S FIGUEROA LOS ANGELES, CA 90007	721110	Hotels (except Casino Hotels) and Motels	11	Industrial, Commercial, & Government Operations
RAFFI'S CHEVRON	128753	2538 CRENSHAW BLVD LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
RAINBOW OIL, INC #99003	178757	650 E WASHINGTON BLVD LOS ANGELES, CA 90015	447190	Other Gasoline Stations	40	Service Stations
RALPHS GROCERY NO 283	123424	5080 RODEO RD LOS ANGELES, CA 90016	445110	Supermarkets and Other Grocery (except Convenience) Stores	32	Area Sources
RAMONAS FOOD GROUP, LLC	187831	6900 S SAN PEDRO ST LOS ANGELES, CA 90003	722511	Full-Service Restaurants	11	Industrial, Commercial, & Government Operations
RANDOLPH & HEIN, INC.	143420	720 E 59TH ST LOS ANGELES, CA 90001	3371	Household and Institutional Furniture and Kitchen Cabinet Manufacturing	11	Industrial, Commercial, & Government Operations
RAPID ANODIZING INC.	16556	1216 W SLAUSON AVE LOS ANGELES, CA 90044	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
RASHID & SONS INC	137111	6303 S FIGUEROA ST LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
REA CLEANERS INC	110751	4455 AVALON BLVD LOS ANGELES, CA 90011	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
REBORN ANTIQUES	166563	1950 W 62ND ST LOS ANGELES, CA 90047	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations
RELIANCE CLEANERS	35472	657 W IMPERIAL HWY LOS ANGELES, CA 90044	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
REXFORD INDUSTRIAL REALTY, L.P.	189964	1420 N MCKINLEY AVE COMPTON, CA 90220	541611	Administrative Management and General Management Consulting Services	11	Industrial, Commercial, & Government Operations
REY LAUNDRY	176680	9606 BROADWAY LOS ANGELES, CA 90003	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
RICHARD'S SHELL STATION	169438	700 E ROSECRANS AVE COMPTON, CA 90221	447190	Other Gasoline Stations	40	Service Stations
RINCON CONSULTANTS, INC	186664	352 W 133RD ST LOS ANGELES, CA 90061	541620	Environmental Consulting Services	11	Industrial, Commercial, & Government Operations
RISE HOUSING, LP	191787	4050 S FIGUEROA ST LOS ANGELES , CA 90037	999990	Other	11	Industrial, Commercial, & Government Operations
RIVKAH, INC.	136643	5407 S NORMANDIE LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ROBERT KUO LTD.	147296	5400 W JEFFERSON BLVD LOS ANGELES, CA 90016	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
ROBERTO'S BODY N PAINT	122570	503 N ALAMEDA COMPTON, CA 90220	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ROBERT'S AUTO BODY SHOP, MOISES COTO DBA	132986	4575 W ADAMS BLVD LOS ANGELES, CA 90016	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
ROBERTSON'S READY MIX	134112	301 W ROSECRANS AVE GARDENA, CA 90061	212321	Construction Sand and Gravel Mining	11	Industrial, Commercial, & Government Operations
ROOP CORPORATION	172857	4351 E ROSECRANS AVE COMPTON, CA 90221	447190	Other Gasoline Stations	40	Service Stations
ROSECRANS ENERGY	156312	14147 FIGUEROA LOS ANGELES, CA 90061	211111	Crude Petroleum Extraction	15	Energy
ROSEY'S AUTO SERV CTR	21671	2601 W FLORENCE AVE LOS ANGELES, CA 90043	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
ROY E. HANSON JR MFG CO	9071	1924 COMPTON AVE LOS ANGELES, CA 90011	332313	Plate Work Manufacturing	11	Industrial, Commercial, & Government Operations
RUBENS BODY SHOP	177052	4325 AVALON BLVD LOS ANGELES, CA 90011	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
S & K PLATING INC	15021	2727 N COMPTON AVE COMPTON, CA 90222	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
S AND M AUTO REPAIR	192616	5027 W ADAMS LOS ANGELES, CA 90016	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
S. LETVIN & SONS	128230	13210 S FIGUEROA LOS ANGELES, CA 90061	423930	Recyclable Material Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
S.D.M. FURNITURE COMPANY	177737	4620 JEFFERSON BLVD LOS ANGELES, CA 90016	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
SA RECYCLING, LLC	193551	10313 S ALAMEDA ST LOS ANGELES, CA 90002	562920	Materials Recovery Facilities	11	Industrial, Commercial, & Government Operations
SAL'S PROPANE INC	118980	638 E GAGE AVE LOS ANGELES, CA 90001	454310	Fuel Dealers	11	Industrial, Commercial, & Government Operations
SALSBURY INC	20016	1010 E 62ND ST LOS ANGELES, CA 90001	337215	Showcase, Partition, Shelving, and Locker Manufacturing	11	Industrial, Commercial, & Government Operations
SALSBURY INDUSTRIES	193124	13809 S FIGUEROA ST LOS ANGELES, CA 90061	337215	Showcase, Partition, Shelving, and Locker Manufacturing	11	Industrial, Commercial, & Government Operations
SAM'S CHEVRON	153477	2546 S LA BREA AVE LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
SANG HAN ENTERPRISE INC	142730	3774 S WESTERN AVE LOS ANGELES, CA 90018	447190	Other Gasoline Stations	40	Service Stations
SANTA FE FUEL INC.	174065	1285 E VERNON AVE LOS ANGELES, CA 90011	447190	Other Gasoline Stations	40	Service Stations
SCLARC	178286	2500 S WESTERN AVE LOS ANGELES, CA 90018	813319	Other Social Advocacy Organizations	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
SEE'S CANDY SHOPS INC	3242	3423-31 S LA CIENEGA BLVD LOS ANGELES, CA 90016	311340	Nonchocolate Confectionery Manufacturing	11	Industrial, Commercial, & Government Operations
SEMPRA ENERGY (THE GAS CO)	27538	701 BULLIS RD COMPTON, CA 90221	221210	Natural Gas Distribution	11	Industrial, Commercial, & Government Operations
SENTINEL PEAK RESOURCES CALIFORNIA LLC	184292	1371 W JEFFERSON BLVD LOS ANGELES, CA 90007	211111	Crude Petroleum Extraction	15	Energy
SENTINEL PEAK RESOURCES CALIFORNIA, LLC	184301	5640 S FAIRFAX AVE LOS ANGELES, CA 90056	211111	Crude Petroleum Extraction	15	Energy
SG FINISHES	193400	5810 S NORMANDIE AVE #6 LOS ANGELES, CA 90044	444190	Other Building Material Dealers	11	Industrial, Commercial, & Government Operations
SHARZAD PETROLEUM ENTERPRISES CORP	125254	1355 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
SHOWROOM, INC.	186040	6931 STANFORD AVE LOS ANGELES, CA 90001	561499	All Other Business Support Services	11	Industrial, Commercial, & Government Operations
SIERRA FURNITURE, INC.	152107	701 E 60TH ST LOS ANGELES, CA 90001	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
SIGGY AUTO BODY	152010	1153 N STANFORD AVE LOS ANGELES, CA 90059	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
SILVER BOOMERANG	150151	5409 W ADAMS BLVD LOS ANGELES, CA 90016	811420	Reupholstery and Furniture Repair	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
SKID ROW HOUSING TRUST	163292	1624 S HOPE ST LOS ANGELES, CA 90015	623220	Residential Mental Health and Substance Abuse Facilities	11	Industrial, Commercial, & Government Operations
SLAUSON CLEANERS	136870	3600 W SLAUSON AVE LOS ANGELES, CA 90043	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	254 W SLAUSON AVE LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
SO CAL CONSTRUCTION INC.	192288	VARIOUS LOCATIONS IN SCAQMD LOS ANGELES, CA 90016	236118	Residential Remodelers	72	Toxics and Waste Management
SO CAL GAS CO	9480	2126 W ADAMS BLVD LOS ANGELES, CA 90018	221210	Natural Gas Distribution	31	Area Sources
SO CAL GAS CO	29615	3124 W 36TH ST LOS ANGELES, CA 90018	221210	Natural Gas Distribution	11	Industrial, Commercial, & Government Operations
SO CAL SAFE CO	19568	510 W WASHINGTON BLVD MONTEBELLO, CA 90640	811412	Appliance Repair and Maintenance	11	Industrial, Commercial, & Government Operations
SO LA CHESTERFIELD SQUARE ANIMAL SRV CTR	192139	1850 W 60TH ST LOS ANGELES, CA 90047	921190	Other General Government Support	11	Industrial, Commercial, & Government Operations
SOUTH BAY KEIRO NURSING HOME	168221	15115 S VERMONT AVE GARDENA, CA 90247	623110	Nursing Care Facilities (Skilled Nursing Facilities)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
SOUTH BAY RETIREMENT RESIDENCE INC	107090	1001 W CRESSEY ST COMPTON, CA 90222	623110	Nursing Care Facilities (Skilled Nursing Facilities)	11	Industrial, Commercial, & Government Operations
SOUTH CITY GAS	137146	449 W IMPERIAL HWY LOS ANGELES, CA 90061	447190	Other Gasoline Stations	40	Service Stations
SPACE WORKS	169040	539 W ROSECRANS AVE GARDENA, CA 90248	561920	Convention and Trade Show Organizers	11	Industrial, Commercial, & Government Operations
SPECTRUM CHEM MFG CORP	56290	14422 S SAN PEDRO ST GARDENA, CA 90248	424690	Other Chemical and Allied Products Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
SPECTRUM PLATING CO	142710	202 W 140TH ST LOS ANGELES, CA 90061	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	74	Toxics and Waste Management
ST JOHN OF GOD RETIREMENT & CARE CENTER	129341	2458 S ST ANDREWS PL LOS ANGELES, CA 90018	623110	Nursing Care Facilities (Skilled Nursing Facilities)	11	Industrial, Commercial, & Government Operations
ST JOHN OF GOD RETIREMENT & CARE CENTER	141134	2468 S ST ANDREWS PL LOS ANGELES, CA 90018	623312	Assisted Living Facilities for the Elderly	11	Industrial, Commercial, & Government Operations
ST JOHN OF GOD RETIREMENT & CARE CTR COR	107554	2015 W ADAMS BLVD LOS ANGELES, CA 90018	623312	Assisted Living Facilities for the Elderly	11	Industrial, Commercial, & Government Operations
STRIPBRIGHT/AIRCRAFT REBUILDERS LLC	190266	901 W ALONDRA BLVD HANGAR ROW "P" COMPTON, CA 90220	238320	Painting and Wall Covering Contractors	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
STUDIO AT INC	186238	5716 W JEFFERSON BLVD LOS ANGELES, CA 90016	337121	Upholstered Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
STUMPTOWN COFFEE CORP	173541	806 S SANTA FE LOS ANGELES, CA 90021	722513	Limited-Service Restaurants	11	Industrial, Commercial, & Government Operations
STUTZMAN PLATING CO	18845	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
SUNNY'S CHINESE FOOD	82580	2706 E ALONDRA BLVD COMPTON, CA 90221	722511	Full-Service Restaurants	31	Area Sources
SUPERIOR GROCERS	91173	3831 E MARTIN LUTHER KING BLVD LYNWOOD, CA 90262	445110	Supermarkets and Other Grocery (except Convenience) Stores	11	Industrial, Commercial, & Government Operations
SUPERIOR GROCERS	161316	2000 S CENTRAL AVE LOS ANGELES, CA 90012	453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)	11	Industrial, Commercial, & Government Operations
SUPERIOR GROCERS	161325	5824 S VERMONT AVE # 116 LOS ANGELES, CA 90044	445110	Supermarkets and Other Grocery (except Convenience) Stores	11	Industrial, Commercial, & Government Operations
SUPERIOR GROCERS	163991	10211 S AVALON BLVD #101 LOS ANGELES, CA 90003	445110	Supermarkets and Other Grocery (except Convenience) Stores	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
SUPERIOR GROCERS NO. 107	163990	8811 S WESTERN AVE #108 LOS ANGELES, CA 90047	445110	Supermarkets and Other Grocery (except Convenience) Stores	11	Industrial, Commercial, & Government Operations
SW PLATING CO	9489	1344 W SLAUSON AVE LOS ANGELES, CA 90044	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
SWISSTEX CALIFORNIA INC.	110096	13660 S FIGUEROA ST LOS ANGELES, CA 90061	313310	Textile and Fabric Finishing Mills	11	Industrial, Commercial, & Government Operations
SYSTEMS WIRE AND CABLE	69861	1165 N STANFORD AVE LOS ANGELES, CA 90059	332618	Other Fabricated Wire Product Manufacturing	11	Industrial, Commercial, & Government Operations
T & D DRUM INC	147978	5419 CORTLAND ST LYNWOOD, CA 90262	33299	All Other Fabricated Metal Product Manufacturing	11	Industrial, Commercial, & Government Operations
TAK COLLISION CENTER INC	184619	5350 W ADAMS BLVD LOS ANGELES, CA 90016	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
TAM'S BURGER #9	70675	11816 LONG BEACH BLVD LYNWOOD, CA 90262	722513	Limited-Service Restaurants	30	Area Sources
TAMS BURGER NO. 14	67992	5837 S FIGUEROA ST LOS ANGELES, CA 90003	722513	Limited-Service Restaurants	31	Area Sources
TAM'S BURGERS NO.1	70392	904 E MANCHESTER AVE LOS ANGELES, CA 90001	722513	Limited-Service Restaurants	31	Area Sources

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
TCI ALUMINUM	48027	240 E ROSECRANS GARDENA, CA 90247	423510	Metal Service Centers and Other Metal Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
TERENCE MCILHARGGY	150840	749 W VENICE BLVD LOS ANGELES, CA 90015	722320	Caterers	31	Area Sources
TESORO (USA) 63130	171548	600 E ROSECRANS AVE LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
THAI BY TRIO	189566	2700 S FIGUEROA ST SUITE 101 LOS ANGELES, CA 90007	722330	Mobile Food Services	30	Area Sources
THE CLOSET FACTORY, INC	111017	12800 S BROADWAY LOS ANGELES, CA 90061	337110	Wood Kitchen Cabinet and Countertop Manufacturing	11	Industrial, Commercial, & Government Operations
THE GOOD SHEPARD MANOR	115709	4411 ELEVENTH ST LOS ANGELES, CA 90043	623312	Assisted Living Facilities for the Elderly	11	Industrial, Commercial, & Government Operations
THE HOME DEPOT, U.S.A. INC.	122737	3363 CENTURY BLVD INGLEWOOD, CA 90301	444110	Home Centers	11	Industrial, Commercial, & Government Operations
THE LOS ANGELES CHILD GUIDANCE CLINIC	95776	3787 S VERMONT AVE LOS ANGELES, CA 90007	624110	Child and Youth Services	11	Industrial, Commercial, & Government Operations
THE REYNOLDS GROUP	174736	VARIOUS LOCATIONS IN SCAQMD LOS ANGELES, CA 90059	562910	Remediation Services	57	Toxics and Waste Management

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
THE STRELITZ CO INC., CALIFORNIA METAL-	61681	366 E 58TH ST LOS ANGELES, CA 90011	423930	Recyclable Material Merchant Wholesalers	77	Toxics and Waste Management
THOMASVILLE CONSTRUCTION, INC	191950	VARIOUS LOCATIONS IN SCAQMD LOS ANGELES, CA 90011	236220	Commercial and Institutional Building Construction	11	Industrial, Commercial, & Government Operations
TIME WARNER CABLE	152286	2204 N LONG BEACH BLVD COMPTON, CA 90221	515210	Cable and Other Subscription Programming	11	Industrial, Commercial, & Government Operations
TIME WARNER CABLE	152303	4352 HOOVER ST LOS ANGELES, CA 90037	453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)	11	Industrial, Commercial, & Government Operations
TIME WARNER CABLE	152418	10401 S MAIN ST LOS ANGELES, CA 90003	515210	Cable and Other Subscription Programming	11	Industrial, Commercial, & Government Operations
TIME WARNER CABLE	152420	3000 JEFFERSON LOS ANGELES, CA 90018	515210	Cable and Other Subscription Programming	11	Industrial, Commercial, & Government Operations
T-MOBILE	185410	127 N WILMINGTON AVE COMPTON, CA 90220	517911	Telecommunications Resellers	11	Industrial, Commercial, & Government Operations
T-MOBILE LAH0091A	188233	1626 TRINITY ST LOS ANGELES, CA 90015	812112	Beauty Salons	11	Industrial, Commercial, & Government Operations
TNEMEC COMPANY INC	595	415-417 E WEBER ST COMPTON, CA 90222	325510	Paint and Coating Manufacturing	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
TOM'S #6	65055	10023 S FIGUEROA ST LOS ANGELES, CA 90003	722513	Limited-Service Restaurants	30	Area Sources
TOM'S DRIVE INN #5	70674	3635 IMPERIAL HWY LYNWOOD, CA 90262	722513	Limited-Service Restaurants	31	Area Sources
TOM'S JR RESTURANT	66233	953 W FLORENCE AVE LOS ANGELES, CA 90044	722513	Limited-Service Restaurants	31	Area Sources
TOM'S JR. # 3	77660	3996 S FIGUEROA ST LOS ANGELES, CA 90037	722513	Limited-Service Restaurants	30	Area Sources
TOM'S JR. RESTAURANT	84836	245 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	722513	Limited-Service Restaurants	31	Area Sources
TOOL SPECIALTY CO	1335	1011 E SLAUSON AVE LOS ANGELES, CA 90011	333515	Cutting Tool and Machine Tool Accessory Manufacturing	11	Industrial, Commercial, & Government Operations
TOWNE CLEANERS	54725	204 E COMPTON BLVD COMPTON, CA 90221	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
TRENCH SHORING	186100	202 N CENTRAL AVE COMPTON, CA 90220	238110	Poured Concrete Foundation and Structure Contractors	11	Industrial, Commercial, & Government Operations
TRENCH SHORING COMPANY, TOM MALLOY CORP.	176299	707 E ROSECRANS AVE LOS ANGELES, CA 90059	423810	Construction and Mining (except Oil Well) Machinery and Equipment Merchant Wholesalers	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
TROPICAL PRESERVING CO INC	70496	1712 NEWTON ST LOS ANGELES, CA 90021	311421	Fruit and Vegetable Canning	11	Industrial, Commercial, & Government Operations
TTVV CORP	187218	1515 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90062	447190	Other Gasoline Stations	40	Service Stations
TZIPPY CARE INC., WESTERN CONVALESCENT H	188332	2190 W ADAMS BLVD LOS ANGELES, CA 90018	623110	Nursing Care Facilities (Skilled Nursing Facilities)	11	Industrial, Commercial, & Government Operations
U S CLEANERS	111454	4832 S WESTERN AVE LOS ANGELES, CA 90062	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
U S GOVT POSTAL SERVICE	57013	7001 S CENTRAL AVE LOS ANGELES, CA 90052	491110	Postal Service	11	Industrial, Commercial, & Government Operations
ULTRA BODY SHOP INC	151440	135 W FLORENCE AVE LOS ANGELES, CA 90003	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	MCCLINTOCK W 34TH CHILDS ST LOS ANGELES, CA 90089	611310	Colleges, Universities, and Professional Schools	11	Industrial, Commercial, & Government Operations
UNIV OF SO CAL/UNIV PARK CAMPUS	110789	734 ADAMS W LOS ANGELES, CA 90089	611310	Colleges, Universities, and Professional Schools	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
UNIVERSAL MOLDING CO.	35565	10840 DRURY LN LYNWOOD, CA 90262	331491	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding	11	Industrial, Commercial, & Government Operations
UNIVERSAL MOLDING COMPANY	91591	10807 STANFORD AVE LYNWOOD, CA 90262	331491	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding	11	Industrial, Commercial, & Government Operations
UNIVERSAL MOLDING COMPANY	145216	10806 STANFORD AVE LYNWOOD, CA 90262	331314	Secondary Smelting and Alloying of Aluminum	11	Industrial, Commercial, & Government Operations
UNIVERSITY GATEWAY LLC	159124	3335 S FIGUEROA LOS ANGELES, CA 90007	611310	Colleges, Universities, and Professional Schools	11	Industrial, Commercial, & Government Operations
UNIVERSITY SO CALIFORNIA, UNIV PK CAMPUS	120190	3025 ROYAL ST TROY HALL APTS LOS ANGELES, CA 90089	611310	Colleges, Universities, and Professional Schools	11	Industrial, Commercial, & Government Operations
UNIVERSITY TIRE CENTER LLC	190752	2908 S VERMONT AVE #B LOS ANGELES, CA 90007	441310	Automotive Parts and Accessories Stores	11	Industrial, Commercial, & Government Operations
US BLANKS, LLC	165187	14700 S SAN PEDRO ST GARDENA, CA 90248	325211	Plastics Material and Resin Manufacturing	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
US BODY SHOP, JUNG BAI KIM DBA	142949	4207 MONTCLAIR ST LOS ANGELES, CA 90018	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
US GASOLINE #2 INC	180478	12706 S CENTRAL AVE LOS ANGELES, CA 90059	447190	Other Gasoline Stations	40	Service Stations
USC - LA FIRE STATION #15	177322	3000 S HOOVER ST LOS ANGELES, CA 90007	922160	Fire Protection	11	Industrial, Commercial, & Government Operations
USC - LA MEMORIAL COLISEUM	180939	3911 S FIGUEROA ST LOS ANGELES, CA 90037	722513	Limited-Service Restaurants	11	Industrial, Commercial, & Government Operations
V&M AEROSPACE LLC	180918	14024 S AVALON BLVD LOS ANGELES, CA 90061	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
VALENCE SURFACE TECHNOLOGIES - LYNWOOD	188380	2605 INDUSTRY WAY LYNWOOD, CA 90262	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	75	Toxics and Waste Management
VALERO DLR JAMES LEE, JAMES SERVICE CTR	18796	3950 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90008	447190	Other Gasoline Stations	40	Service Stations
VALERO DLR, FLORENTINO C APELES	58990	2217 S NORMANDIE AVE LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations
VALERO, THREE FOUR INC.	147549	4404 S WESTERN AVE LOS ANGELES, CA 90062	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
VEER CRENSHAW PARTNERS INC	189132	3412 CRENSHAW LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations
VEER FUEL PARTNERS INC	187052	2050 W MANCHESTER AVE LOS ANGELES, CA 90047	447190	Other Gasoline Stations	40	Service Stations
VERIZON WIRELESS	153057	1440 S ATLANTIC AVE COMPTON, CA 90221	517210	Wireless Telecommunications Carriers (except Satellite)	11	Industrial, Commercial, & Government Operations
VERMONT AUTO COLLISION CENTER	143200	4908 S VERMONT AVE LOS ANGELES, CA 90037	811111	General Automotive Repair	11	Industrial, Commercial, & Government Operations
VERMONT FUEL, INC.	161396	2202 S VERMONT AVE LOS ANGELES, CA 90007	447190	Other Gasoline Stations	40	Service Stations
VERNON CAPITAL FUEL INC	192340	4368 AVALON BLVD LOS ANGELES, CA 90011	447190	Other Gasoline Stations	40	Service Stations
VERNON COACHWORKS	163871	649 W VERNON LOS ANGELES, CA 90037	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
VERNON FUEL DIS INC	118622	4321 S ALAMEDA ST LOS ANGELES, CA 90058	447190	Other Gasoline Stations	40	Service Stations
VERSA PRODUCTS, INC.	149352	14105 S AVALON BLVD LOS ANGELES, CA 90061	423210	Furniture Merchant Wholesalers	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
VICTORY POWDER COATING & SANDBLASTING IN	178026	330 W 58TH ST UNIT B LOS ANGELES, CA 90037	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	11	Industrial, Commercial, & Government Operations
VIEW HEIGHTS CONVALESCENT HOSPITAL	83687	12619 S AVALON BLVD LOS ANGELES, CA 90061	622110	General Medical and Surgical Hospitals	11	Industrial, Commercial, & Government Operations
VILLA CLEANERS	95193	14329 S CENTRAL AVE COMPTON, CA 90220	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
VSLA LLC	188615	335 W REDONDO BEACH BLVD GARDENA, CA 90248	999990	Other	11	Industrial, Commercial, & Government Operations
W. A. BENJAMIN ELECTRIC CO	5363	1615 STAUNTON AVE LOS ANGELES, CA 90021	335313	Switchgear and Switchboard Apparatus Manufacturing	11	Industrial, Commercial, & Government Operations
WALSH SHEA CORRIDOR CONSTRUCTORS	186304	4727 CRENSHAW BLVD LOS ANGELES, CA 90043	236115	New Single-Family Housing Construction (except For-Sale Builders)	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
WALSH SHEA CORRIDOR CONSTRUCTORS	186307	3331 60TH ST LOS ANGELES, CA 90043	236115	New Single-Family Housing Construction (except For-Sale Builders)	11	Industrial, Commercial, & Government Operations
WALSH SHEA CORRIDOR CONSTRUCTORS	186308	6720 VICTORIA AVE LOS ANGELES, CA 90043	236115	New Single-Family Housing Construction (except For-Sale Builders)	11	Industrial, Commercial, & Government Operations
WASHINGTON GARMENT DYEING & FINISHING	111958	1334 E 18TH ST LOS ANGELES, CA 90021	313310	Textile and Fabric Finishing Mills	11	Industrial, Commercial, & Government Operations
WATTS HEALTH CARE CORP	134889	10300 S COMPTON AVE LOS ANGELES, CA 90001	621112	Offices of Physicians, Mental Health Specialists	11	Industrial, Commercial, & Government Operations
WESLEY ALLEN INC	3197	912-1001 E 60TH ST LOS ANGELES, CA 90001	337124	Metal Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
WEST ADAMS PETROLEUM INC	184882	1691 W ADAMS BLVD LOS ANGELES, CA 90004	447190	Other Gasoline Stations	40	Service Stations
WEST ANGELES CHURCH OF GOD IN CHRIST	125244	3600 CRENSHAW BLVD LOS ANGELES, CA 90018	813110	Religious Organizations	11	Industrial, Commercial, & Government Operations
WEST ANGELES CHURCH OF GOD IN CHRIST	156240	3045 CRENSHAW BLVD LOS ANGELES, CA 90016	813110	Religious Organizations	11	Industrial, Commercial, & Government Operations
WEST COAST METAL FINISHING	119682	5722 BANDERA ST VERNON, CA 90058	332312	Fabricated Structural Metal Manufacturing	74	Toxics and Waste Management

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
WEST SHOP CF	191816	6231 S MANHATTAN PL # I LOS ANGELES, CA 90047	337122	Nonupholstered Wood Household Furniture Manufacturing	11	Industrial, Commercial, & Government Operations
WESTERN AUTO BODY & PAINT REPAIR	162773	7401 S WESTERN AVE LOS ANGELES, CA 90047	811121	Automotive Body, Paint, and Interior Repair and Maintenance	11	Industrial, Commercial, & Government Operations
WESTERN WASTE C/O WASTE MANAGEMENT	57674	407 E EL SEGUNDO BLVD COMPTON, CA 90222	562219	Other Nonhazardous Waste Treatment and Disposal	11	Industrial, Commercial, & Government Operations
WG HOLDINGS SPV, LLC	195459	142 W ROSECRANS AVE LOS ANGELES, CA 90059	211111	Crude Petroleum Extraction	15	Energy
WG HOLDINGS SPV, LLC	195460	14501 S FIGUEROA ST LOS ANGELES, CA 90003	211111	Crude Petroleum Extraction	15	Energy
WG HOLDINGS SPV, LLC	195461	13925 BROADWAY LOS ANGELES, CA 90061	211111	Crude Petroleum Extraction	15	Energy
WG HOLDINGS SPV, LLC	195120	13601 S BROADWAY LOS ANGELES, CA 90003	211111	Crude Petroleum Extraction	15	Energy
WG HOLDINGS SPV, LLC	195121	121 W 140TH LOS ANGELES, CA 90061	211111	Crude Petroleum Extraction	15	Energy
WHOLESALE CLEANERS	192585	4132 CRENSHAW BLVD LOS ANGELES, CA 90008	812320	Drycleaning and Laundry Services (except Coin-Operated)	11	Industrial, Commercial, & Government Operations
WILLOWBROOK/ROSA PARKS STATION	191199	11720 WILMINGTON AVE LOS ANGELES, CA 90059	525920	Trusts, Estates, and Agency Accounts	11	Industrial, Commercial, & Government Operations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
WINALL OIL CO #2	33824	615 W FLORENCE AVE LOS ANGELES, CA 90044	447190	Other Gasoline Stations	40	Service Stations
WINALL OIL CO #9	27306	4442 S AVALON LOS ANGELES, CA 90011	447190	Other Gasoline Stations	40	Service Stations
WING LEGENDS	192774	1110 S LONG BEACH BLVD COMPTON, CA 90221	722511	Full-Service Restaurants	31	Area Sources
WISE LIVING	167612	2001 W 60TH ST LOS ANGELES, CA 90047	337125	Household Furniture (except Wood and Metal) Manufacturing	11	Industrial, Commercial, & Government Operations
WOODY'S BARBECUE	182185	1958 W FLORENCE AVE LOS ANGELES, CA 90008	722513	Limited-Service Restaurants	11	Industrial, Commercial, & Government Operations
WORLD OIL MARKETING CO #1	1261	7201 S SAN PEDRO ST LOS ANGELES, CA 90003	447190	Other Gasoline Stations	40	Service Stations
WORLDWIDE PRODUCE	185798	2652 LONG BEACH AVE VERNON, CA 90058	424480	Fresh Fruit and Vegetable Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
YOUNG'S SHELL	163546	4403 S FIGUEROA ST LOS ANGELES, CA 90037	447190	Other Gasoline Stations	40	Service Stations
YWK CORPORATION DBA M&K METAL CO	175538	14400 FIGUEROA ST GARDENA, CA 90248	423510	Metal Service Centers and Other Metal Merchant Wholesalers	11	Industrial, Commercial, & Government Operations
Z & R OIL COMPANY	140519	3300 S LA CIENEGA BLVD LOS ANGELES, CA 90016	447190	Other Gasoline Stations	40	Service Stations

Facility Name	Facility ID	Address	NAICS Code	NAICS	TS Number	South Coast AQMD Inspection Team
ZIBA INVESTMENT CORP	133145	740 W ROSECRANS AVE COMPTON, CA 90222	447190	Other Gasoline Stations	40	Service Stations

Table A4-3: Inspections List from 2018 through 2021 in SLA

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
14221 FIGUEROA	188036	12/11/2018	14221 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
14221 FIGUEROA	188036	12/22/2020	14221 S FIGUEROA ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
1924 WEST ALONDRA BLVD	193347	4/15/2021	1924 W ALONDRA BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
1924 WEST ALONDRA BLVD	193347	8/12/2021	1924 W ALONDRA BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
323 AUTO COLLISION CENTER	184881	1/22/2021	355 E MANCHESTER AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
3775 VERMONT	188031	11/27/2018	3775 S VERMONT ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
3775 VERMONT	188031	11/12/2020	3775 S VERMONT ST LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
7-ELEVEN #37694	182924	3/11/2020	10000 S VERMONT AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
7-ELEVEN #37694	182924	4/15/2020	10000 S VERMONT AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
7-ELEVEN #37694	182924	10/6/2020	10000 S VERMONT AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
7-ELEVEN #37694	182924	4/21/2021	10000 S VERMONT AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
7-ELEVEN #37694	182924	10/27/2021	10000 S VERMONT AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
7-ELEVEN #38197	189785	9/17/2019	505 W CENTURY BLVD LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
7-ELEVEN #38197	189785	5/6/2021	505 W CENTURY BLVD LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
A AND B AUTO BODY AND SALES INC	96419	6/12/2018	14200 S SAN PEDRO ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
A AND B CENTRAL, INC., DBA ANDY'S SHELL	147056	5/29/2019	1150 E IMPERIAL LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
A AND B CENTRAL, INC., DBA ANDY'S SHELL	147056	5/29/2019	1150 E IMPERIAL LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
A AND B CENTRAL, INC., DBA ANDY'S SHELL	147056	5/5/2020	1150 E IMPERIAL LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
A AND B LONG BEACH INC	176130	12/28/2018	11151 LONG BEACH BLVD LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
A M OIL	153912	7/9/2019	105 E IMPERIAL HWY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
AAA PLATING & INSPECTION, INC	25087	2/13/2018	424 DIXON ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
AAA PLATING & INSPECTION, INC	25087	5/25/2018	424 DIXON ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	12/18/2018	424 DIXON ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	3/22/2019	424 DIXON ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	6/13/2019	424 DIXON ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	6/13/2019	424 DIXON ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	12/17/2019	424 DIXON ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
AAA PLATING & INSPECTION, INC	25087	3/6/2020	424 DIXON ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	6/2/2020	424 DIXON ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	12/3/2020	424 DIXON ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	3/2/2021	424 DIXON ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAA PLATING & INSPECTION, INC	25087	12/8/2021	424 DIXON ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AAMES SERVICE INC., KIM'S UNION 76	147273	3/11/2020	14216 S AVALON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AC BODY SHOP AND AUTO MECH.	58606	9/26/2019	11596 S ATLANTIC AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AC UNIVERSAL BODY SHOP	159886	9/21/2018	6819 S BROADWAY LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ACCURATE ANODIZING, INC	62266	4/8/2020	1801 W EL SEGUNDO BLVD COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ACS BODY & PAINT	182422	2/4/2020	1855 W GAGE AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ADAMS BODY SHOP	127701	12/12/2018	4857 W ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ADAMS BODY SHOP	127701	6/16/2020	4857 W ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ADRIANO DESIGN INC	140681	6/6/2018	244 W 140TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ADVANCE PAPER BOX CO	47084	4/26/2018	6100 S GRAMERCY PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ADVANCE PAPER BOX CO	47084	7/25/2019	6100 S GRAMERCY PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
ADVANCE PAPER BOX CO	47084	5/26/2020	6100 S GRAMERCY PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
ADVANCE PAPER BOX CO	47084	6/23/2021	6100 S GRAMERCY PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AHMED UNION 76	155446	6/14/2019	11175 LONG BEACH BLVD LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
AIRCOAT, INC.	113761	7/6/2018	13405 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AIRCOAT, INC.	113761	2/25/2021	13405 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AIRGAS USA, INC.	164982	2/25/2021	352 W 133RD ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AIRGAS USA, LLC	108370	6/24/2021	11711 S ALAMEDA ST LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AIRGAS USA, LLC	164981	6/24/2021	11711 S ALAMEDA ST LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AIRGAS USA, LLC, AIRGAS INC.	171842	6/24/2021	12000 ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AL QAYYUM OIL CORPORATION	140073	7/26/2018	255 E MANCHESTER AVE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AL QAYYUM OIL CORPORATION	140073	10/22/2020	255 E MANCHESTER AVE LOS ANGELES, CA 90001	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
ALBERTO'S FINE ART'S FURNITURE	139609	6/6/2018	10460 S VERMONT AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ALERT CLEANERS, BENJAMIN HURTADO	115285	10/6/2021	2000 E ROSECRANS AVE COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ALEX CLEANERS	134482	4/29/2019	2036 N SANTA FE AVE COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
ALEX CLEANERS	134482	10/6/2021	2036 N SANTA FE AVE COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ALEXANDER & WILLIS	169256	6/5/2018	200 W 140TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ALL SEASON AUTO BODY & PAINT INC	180804	5/2/2019	8506 S WESTERN AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ALLENCO ENERGY INC.	161814	3/7/2018	814 W 23RD ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
ALLENCO ENERGY INC.	161814	8/7/2018	814 W 23RD ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	11/22/2019	814 W 23RD ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	3/6/2020	814 W 23RD ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
ALLENCO ENERGY INC.	161814	6/5/2020	814 W 23RD ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ALLENCO ENERGY INC.	161814	2/5/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	2/12/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	3/17/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	3/26/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	4/2/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	4/15/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	6/17/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	7/29/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	8/18/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	9/17/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	10/29/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	11/30/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
ALLENCO ENERGY INC.	161814	12/17/2021	814 W 23RD ST LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
ALONDRA OIL INC	185262	7/10/2018	220 W ALONDRA BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ALONDRA OIL INC	185262	7/26/2018	220 W ALONDRA BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ALONDRA OIL INC	185262	2/11/2021	220 W ALONDRA BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
ALPHA CENTURION	55129	6/16/2021	802 E GAGE AVE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ALVARADO CABRERA	193573	12/3/2020	634 E 79TH ST LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AMFOAM INC	139252	11/22/2019	15110 S BROADWAY ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AMIN'S OIL INC	139323	11/27/2018	2603 S NORMANDIE AVE LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AMKO FIXTURES & SEATING CO	120636	9/21/2018	5833 S AVALON BLVD LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ANGEL'S GAS AND MART, SOON HWAN OH DBA	142287	9/18/2018	1248 S WILMINGTON AVE COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ANGEL'S GAS AND MART, SOON HWAN OH DBA	142287	3/10/2021	1248 S WILMINGTON AVE COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED OIL #124	177906	5/10/2019	502 W ROSECRANS COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED OIL #124	177906	9/9/2020	502 W ROSECRANS COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED OIL #133	177917	6/14/2019	11515 S ATLANTIC AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
APRO LLC DBA UNITED OIL #133	177917	2/2/2021	11515 S ATLANTIC AVE LYNWOOD, CA 90262	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED OIL #150	177956	1/24/2019	2121 ARLINGTON AVE LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED OIL #150	177956	7/7/2020	2121 ARLINGTON AVE LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
APRO LLC DBA UNITED OIL #150	177956	1/19/2021	2121 ARLINGTON AVE LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED OIL #182	177990	7/26/2019	5100 W JEFFERSON BLVD LOS ANGELES, CA 90046	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITED PACIFIC #0613	192374	7/8/2021	505 W VERNON AVE LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITIED OIL #101	177857	4/18/2019	450 E EL SEGUNDO BLVD LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
APRO LLC DBA UNITIED OIL #101	177857	5/5/2020	450 E EL SEGUNDO BLVD LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARCHITECTURAL ANTIQUES WEST	145868	6/21/2018	13900 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARCO #42114	174635	1/25/2019	4406 ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARCO #42114	174635	6/16/2021	4406 ADAMS BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARCO #42114	174635	6/29/2021	4406 ADAMS BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARMANDO'S FURNITURE FINISHING	99686	12/11/2018	4912 W JEFFERSON BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARTISTIC WELDING WORK SHOP	146166	6/21/2018	1446 W SLAUSON AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARTISTIC WELDING WORK SHOP	146166	5/28/2020	1446 W SLAUSON AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ARTO BRICK CALIFORNIA PAVERS	161677	6/1/2018	15209 S BROADWAY ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
ARTO BRICK CALIFORNIA PAVERS	161677	11/21/2019	15209 S BROADWAY ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ASBESTOS INSTANT RESPONSE INC	133566	4/1/2020	VARIOUS LOCATIONS IN SCAQMD LOS ANGELES, CA 90018	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
AUTO DETAIL SPECIALISTS & SERVICES LLC	174654	8/9/2019	3841 S BROADWAY PL LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
AUTOMOBILE CLUB OF SO CAL	17171	9/9/2020	2601 S FIGUEROA ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AUTO-TECH BODY SHOP	152099	7/11/2018	3475 W SLAUSON AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AUTO-TECH BODY SHOP	152099	11/19/2019	3475 W SLAUSON AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
AVALON ARCO & SN MART	165878	2/28/2018	9600 S AVALON BLVD LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
AVALON ARCO & SN MART	165878	5/15/2019	9600 S AVALON BLVD LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
AVALON ARCO & SN MART	165878	4/10/2020	9600 S AVALON BLVD LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AVALON ARCO & SN MART	165878	10/20/2020	9600 S AVALON BLVD LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AVALON ARCO & SN MART	165878	8/27/2021	9600 S AVALON BLVD LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
AVALON PREMIUM TANK CLEANING	108730	4/27/2018	14700 AVALON BLVD GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AVALON PREMIUM TANK CLEANING	108730	1/8/2020	14700 AVALON BLVD GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
AVNEX SURFACE FINISHING INC.	189752	5/3/2019	327 W 132ND ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
AVNEX SURFACE FINISHING INC.	189752	4/15/2020	327 W 132ND ST LOS ANGELES, CA 90061	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
AVNEX SURFACE FINISHING INC.	189752	10/7/2020	327 W 132ND ST LOS ANGELES, CA 90061	FACILITY INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	3/9/2018	239 E GREENLEAF BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	5/31/2018	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
BARKEN'S HARDCHROME, INC	121215	7/31/2018	239 E GREENLEAF BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	7/31/2018	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	10/31/2018	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	3/12/2019	239 E GREENLEAF BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
BARKEN'S HARDCHROME, INC	121215	6/13/2019	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	8/21/2019	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	11/20/2019	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	3/12/2020	239 E GREENLEAF BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
BARKEN'S HARDCHROME, INC	121215	5/20/2020	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	9/17/2020	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	12/9/2020	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
BARKEN'S HARDCHROME, INC	121215	12/9/2020	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
BARKEN'S HARDCHROME, INC	121215	3/9/2021	239 E GREENLEAF BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
BARKEN'S HARDCHROME, INC	121215	6/4/2021	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
BARKEN'S HARDCHROME, INC	121215	9/16/2021	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BARKEN'S HARDCHROME, INC	121215	11/30/2021	239 E GREENLEAF BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
BLACK TUX, INC.	180260	1/18/2019	14600 S MAIN ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

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BLUETRITON BRANDS	144422	5/16/2018	1925 COMPTON AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
BODEGA LATINA CORP	158163	6/28/2019	3321 W CENTURY BLVD INGLEWOOD, CA 90303	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
BOWERS & SONS CLEANERS, VIVIAN BOWERS DB	124815	6/18/2020	2509 S CENTRAL AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
BOWMAN PLATING CO INC	18989	3/29/2018	2631 E 126TH ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
BOWMAN PLATING CO INC	18989	11/1/2018	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
BOWMAN PLATING CO INC	18989	11/16/2018	2631 E 126TH ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
BOWMAN PLATING CO INC	18989	2/26/2019	2631 E 126TH ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
BOWMAN PLATING CO INC	18989	6/25/2019	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
BOWMAN PLATING CO INC	18989	9/13/2019	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
BOWMAN PLATING CO INC	18989	12/5/2019	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
BOWMAN PLATING CO INC	18989	1/14/2020	2631 E 126TH ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	4/10/2020	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
BOWMAN PLATING CO INC	18989	8/5/2020	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
BOWMAN PLATING CO INC	18989	10/21/2020	2631 E 126TH ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	10/27/2020	2631 E 126TH ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	10/30/2020	2631 E 126TH ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
BOWMAN PLATING CO INC	18989	11/4/2020	2631 E 126TH ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	11/12/2020	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
BOWMAN PLATING CO INC	18989	11/17/2020	2631 E 126TH ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	12/1/2020	2631 E 126TH ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	3/25/2021	2631 E 126TH ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
BOWMAN PLATING CO INC	18989	6/18/2021	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	9/2/2021	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BOWMAN PLATING CO INC	18989	12/2/2021	2631 E 126TH ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BREITBURN OPERATING, LP	150197	8/26/2020	130 W ROSECRANS AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	4/30/2019	9915 S BROADWAY BLVD LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	7/19/2019	9915 S BROADWAY BLVD LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	8/1/2019	9915 S BROADWAY BLVD LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
BROADWAY MART, INC	180406	6/7/2019	315 W VERNON AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
BROADWAY MART, INC	180406	12/10/2020	315 W VERNON AVE LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BUYRITE	103751	5/9/2019	251 W MANCHESTER AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

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BUYRITE	103751	4/23/2020	251 W MANCHESTER AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
BUYRITE	103751	10/20/2020	251 W MANCHESTER AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
C & R PLATING, INC.	171832	3/28/2019	245 W 135TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
C & R PLATING, INC.	171832	6/7/2019	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
C & R PLATING, INC.	171832	8/13/2019	245 W 135TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
C & R PLATING, INC.	171832	11/14/2019	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
C & R PLATING, INC.	171832	2/6/2020	245 W 135TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
C & R PLATING, INC.	171832	5/7/2020	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
C & R PLATING, INC.	171832	8/27/2020	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
C & R PLATING, INC.	171832	3/30/2021	245 W 135TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
C & R PLATING, INC.	171832	5/24/2021	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
C & R PLATING, INC.	171832	9/23/2021	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
C & R PLATING, INC.	171832	12/15/2021	245 W 135TH ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
C B S FURNITURE MFG CO INC	25382	10/17/2018	310 E 32ND ST LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
C J AUTO CENTER BODY & PAINT AUTO REPAIR	182615	2/4/2020	1849 W GAGE ST LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
C L AUTO BODY SHOP	136685	3/24/2021	4515 S VERMONT AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

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CAL METAL PROCESSING CO	23410	2/25/2020	1518 - W SLAUSON 1530 AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CAL METAL PROCESSING CO	23410	4/15/2020	1518 - W SLAUSON 1530 AVE LOS ANGELES, CA 90047	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
CALIFORNIA SCIENCE CENTER	128931	1/30/2019	700 EXPOSITION PARK DR LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CALIFORNIA AFRICAN AMERICAN MUSEUM	61817	1/30/2019	600 STATE DR LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CALIFORNIA WASTE SERVICES	137315	7/3/2018	621 W 152ND ST GARDENA, CA 90247	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CARDLOCK FUELS SYSTEM INC	115258	10/17/2019	506 W ROSECRANS GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CARDLOCK FUELS SYSTEM INC	115258	12/16/2020	506 W ROSECRANS GARDENA, CA 90248	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CARLOS CLEANERS	168277	6/3/2019	1764 MARTIN LUTHER KING BLVD LOS ANGELES, CA 90062	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CARRILLO BODY SHOP	181878	1/15/2020	1515 S ALAMEDA ST COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CARSON - WILMINGTON, INC	156145	4/19/2019	5820 S FIGUEROA ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CASTLE CLEANERS, RICARDO RUIZ, DBA	121117	4/29/2019	2524 E ALONDRA BLVD COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
CEMAK TRUCKING	86436	5/18/2021	11700 S ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CEMCOAT INC	113621	3/25/2021	4928 W JEFFERSON BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	55343	4/13/2018	2722 N ALAMEDA ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN

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CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	55343	4/20/2018	2722 N ALAMEDA ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	55343	5/11/2018	2722 N ALAMEDA ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	55343	11/1/2018	2722 N ALAMEDA ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
CENTURY AND MAIN, INC.	147989	4/2/2019	9922 S MAIN ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CENTURY AND MAIN, INC.	147989	4/2/2019	9922 S MAIN ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CENTURY AND MAIN, INC.	147989	2/16/2021	9922 S MAIN ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CENTURY AND MAIN, INC.	147989	3/23/2021	9922 S MAIN ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHALY'S DRY CLEANERS, FRANCISCO CLEMENTE	151830	1/23/2019	914 S CENTRAL AVE COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CHEVIOT FURN. FINISHING	62476	3/13/2019	5366 ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON PRODUCTS COMPANY,SS#20-7669	116144	4/20/2018	4000 S FIGUEROA ST LOS ANGELES, CA 90089	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON PRODUCTS COMPANY,SS#20-7669	116144	5/30/2018	4000 S FIGUEROA ST LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON PRODUCTS COMPANY,SS#20-7669	116144	5/6/2020	4000 S FIGUEROA ST LOS ANGELES, CA 90089	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON PRODUCTS COMPANY,SS#20-7669	116144	11/10/2020	4000 S FIGUEROA ST LOS ANGELES, CA 90089	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

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CHEVRON PRODUCTS COMPANY,SS#20-7669	116144	5/5/2021	4000 S FIGUEROA ST LOS ANGELES, CA 90089	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	3/1/2018	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	3/29/2018	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	9/3/2020	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	3/16/2021	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	9/8/2021	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHEVRON USA PRODUCTS/CHEVRON DLR #96606	103234	11/19/2021	525 W WASHINGTON BLVD LOS ANGELES, CA 90015	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CHOI'S AUTOBODY & REPAIR	189473	4/9/2019	2320 W VERNON AVE LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K #2709440, CIRCLE K STORES, INC.	169573	7/12/2019	2620 S FIGUEROA ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K #2709440, CIRCLE K STORES, INC.	169573	2/10/2021	2620 S FIGUEROA ST LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K #2709440, CIRCLE K STORES, INC.	169573	8/12/2021	2620 S FIGUEROA ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K STORES INC, SAMER ALI YASSINE S	169357	6/8/2018	7130 CRENSHAW BLVD LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

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CIRCLE K STORES INC, SAMER ALI YASSINE S	169357	4/30/2020	7130 CRENSHAW BLVD LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K STORES INC, SAMER ALI YASSINE S	169357	4/16/2021	7130 CRENSHAW BLVD LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
CIRCLE K STORES INC, SAMER ALI YASSINE S	169357	4/23/2021	7130 CRENSHAW BLVD LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K STORES, INC., C/O LORENA SANCHE	169269	1/18/2018	5776 WASHINGTON BLVD CULVER CITY, CA 90232	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K STORES, INC., C/O LORENA SANCHE	169269	9/3/2020	5776 WASHINGTON BLVD CULVER CITY, CA 90232	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K STORES, INC., C/O LORENA SANCHE	169269	3/2/2021	5776 WASHINGTON BLVD CULVER CITY, CA 90232	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CIRCLE K STORES, INC., C/O LORENA SANCHE	169269	7/30/2021	5776 WASHINGTON BLVD CULVER CITY, CA 90232	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CM LAUNDRY, LLC	153702	6/6/2018	14919 S FIGUEROA ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
COMILLA CORP	139763	3/30/2018	1010 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
COMILLA CORP	139763	8/2/2019	1010 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
COMILLA CORP	139763	8/18/2020	1010 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
COMPETENCY COLLISION	174853	6/6/2018	1541 W FLORENCE AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CONTINENTAL FORGE CO	20600	9/20/2018	512 CARLIN ST COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

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COOPER & BRAIN, BANK LEASE	39035	1/28/2020	600 W 135TH ST LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
COOPER & BRAIN, BANK LEASE	39035	8/26/2020	600 W 135TH ST LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
COOPER AND BRAIN INC	63013	8/26/2020	13110 ESTRELLA AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
COSMOS NEON DESIGN INC	152433	2/5/2020	6222 S WILTON PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
COSWAY CO INC	53015	5/7/2019	14805 S MAPLE ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
COTTON CLUB DRY CLEANERS	149344	5/13/2019	3154 W FLORENCE AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
COURTESY CLEANERS, M YADEGAR, DBA	121602	4/29/2019	1705 E COMPTON BLVD COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CRENSHAW COLLISION CENTER	183520	8/25/2020	6830 S CRENSHAW BLVD LOS ANGELES, CA 90048	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CRENSHAW ENERGY & RETAIL, LLC	167315	9/27/2019	5805 CRENSHAW BLVD LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CRENSHAW ENERGY & RETAIL, LLC	167315	7/9/2020	5805 CRENSHAW BLVD LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CRENSHAW LAX TRANSIT CORRIDOR	178462	7/3/2019	3646 S CRENSHAW BLVD LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
CRENSHAW MEDICAL GROUP, LP	137927	6/19/2020	3756 SANTA ROSALIA DR LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CRENSHAW OIL/HOSSEIN GHASSEMI	177183	3/29/2018	3227 W 54TH ST LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CRENSHAW SHELL MINI MART	168130	2/18/2020	3645 S CRENSHAW LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
CRENSHAW SHELL MINI MART	168130	4/21/2020	3645 S CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
CRENSHAW SHELL MINI MART	168130	8/11/2021	3645 S CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
CUSTOM FURNITURE & CABINETS, INC.	180135	6/23/2020	13930 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
CUSTOMS BY LOPEZ	154683	7/25/2018	13407 S ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DAE EUN INC	106729	3/1/2019	2025 S WESTERN AVE LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
DAVID'S SERVICE STATION, NAM CHUNG DBA	121298	12/13/2019	1404 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90062	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
DAVID'S SERVICE STATION, NAM CHUNG DBA	121298	7/7/2020	1404 W MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90062	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DAVIS & WELLS INC.	43153	10/31/2019	11090 S ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
DDS COLLISION, INC	188244	5/1/2019	7511 1/2 S WESTERN AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DEBORAH & TWINS INC	136641	4/18/2019	7600 S WESTERN AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
DEBORAH & TWINS INC	136641	5/12/2020	7600 S WESTERN AVE LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	3/21/2018	2000 N ALAMEDA ST COMPTON, CA 90222	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	3/21/2018	2000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	9/20/2018	2000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	9/13/2019	2000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	10/20/2020	2000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	10/21/2020	2000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DEMENNO-KERDOON DBA WORLD OIL RECYCLING	800037	9/20/2021	2000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DESIGN REALITY	160796	5/18/2018	330 W 58TH ST UNIT A LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DESIGNERS CHOICE FURNITURE FINISHING INC	107514	3/6/2019	5530 W ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DESTINY CHEVRON	164590	9/18/2018	101 W COMPTON BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
DESTINY CHEVRON	164590	4/14/2020	101 W COMPTON BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DESTINY CHEVRON	164590	10/14/2020	101 W COMPTON BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DESTINY CHEVRON	164590	5/4/2021	101 W COMPTON BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DESTINY CHEVRON	164590	10/13/2021	101 W COMPTON BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DON KELLER COLLISION CENTER	164513	7/23/2020	7314 AVALON BLVD LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
DPSS - EXPOSITION PARK WEST ASSET LEASIN	126835	3/3/2021	3833 S VERMONT AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
DREWELOW REMEDIATION EQUIPMENT INC	141609	12/6/2019	5860 S WILTON PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DUCM INC	136538	6/15/2018	801 W EL SEGUNDO BLVD COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
DUCM INC	136538	9/30/2020	801 W EL SEGUNDO BLVD COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
DUCM INC	136538	3/26/2021	801 W EL SEGUNDO BLVD COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DUCM INC	136538	9/21/2021	801 W EL SEGUNDO BLVD COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
DUTKO HARDWOOD FLOORS INC	151292	2/23/2021	14116 TOWNE AVE LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	12/18/2019	2126 W ADAMS BLVD LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	1/5/2021	2126 W ADAMS BLVD LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	11/19/2021	2126 W ADAMS BLVD LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	12/17/2021	2126 W ADAMS BLVD LOS ANGELES, CA 90018	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	1/25/2018	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	3/29/2018	431 E OAKS ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	5/29/2018	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	6/21/2018	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	8/3/2018	431 E OAKS ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	10/17/2018	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	3/21/2019	431 E OAKS ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	6/18/2019	431 E OAKS ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	8/22/2019	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	11/21/2019	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	3/5/2020	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	5/8/2020	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	6/16/2020	431 E OAKS ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	9/24/2020	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	12/8/2020	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	3/17/2021	431 E OAKS ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	6/9/2021	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	8/26/2021	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	12/3/2021	431 E OAKS ST COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
EARLE M. JORGENSEN CO	124560	11/19/2020	1929 MARTIN LUTHER KING BLVD LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
EBENEZER CLEANERS	146649	7/8/2020	4219 S MAIN ST LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ECONOMY CLEANERS AND LAUNDRY	173653	9/2/2020	5101 S CENTRAL AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
EL SUPER, BODEGA LATINA CORP.	164606	6/19/2020	1100 W SLAUSON AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
ELECTROLIZING INC	7978	3/9/2018	1947 HOOPER AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ELECTROLIZING INC	7978	3/4/2019	1947 HOOPER AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	6/3/2019	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	9/16/2019	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	12/2/2019	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	3/16/2020	1947 HOOPER AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	9/17/2020	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	12/17/2020	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	3/15/2021	1947 HOOPER AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
ELECTROLIZING INC	7978	5/24/2021	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	9/20/2021	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELECTROLIZING INC	7978	11/8/2021	1947 HOOPER AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELMESIRY, INC SM OIL	170704	3/15/2018	1340 E IMPERIAL HWY LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELMESIRY, INC SM OIL	170704	6/4/2019	1340 E IMPERIAL HWY LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
ELMESIRY, INC SM OIL	170704	4/14/2020	1340 E IMPERIAL HWY LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ELTA PATIO AUTO CENTER & BODY SHOP	132448	8/8/2019	15220 S SAN PEDRO ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
EVERGREEN RECYCLING, INC.	164018	4/18/2019	8700 CROCKER ST LOS ANGELES, CA 90003	SURVEILLANCE ONLY	NOTICE TO COMPLY ISSUED
EVERGREEN RECYCLING, INC.	164018	5/3/2019	8700 CROCKER ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
EXPRESS SIGN & NEON	178198	11/15/2019	1720 W SLAUSON AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
EXXONMOBIL OIL CORPORATION	179442	10/30/2019	1406 W MANCHESTER AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
EXXONMOBIL OIL CORPORATION	173882	11/8/2019	1002 E 126TH ST LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
FEDERAL AVIATION ADMIN	131677	7/7/2020	KENNETH HAHN PK/S LA CIENEGA LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
FLORENCE FOOD MART CORP	144403	5/27/2021	428 W FLORENCE AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
FLORENCE GAS MART INC	180526	10/5/2018	303 W FLORENCE AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
FLORENCE GAS MART INC	180526	7/14/2020	303 W FLORENCE AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
FLORENCE SHELL	149032	3/14/2019	605 E FLORENCE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
FLORENCE SHELL	149032	3/14/2019	605 E FLORENCE LOS ANGELES, CA 90001	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
FMG PETROLEUM INC	179582	12/11/2018	14204 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
G & M OIL CO, LLC #57	111357	6/28/2019	4346 E IMPERIAL HWY LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
G & M OIL CO, LLC #79	116025	7/27/2018	256 E MANCHESTER AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
G & M OIL CO, LLC #79	116025	2/16/2021	256 E MANCHESTER AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
G & S STATION, GEHAN KHAFAGY	176766	6/20/2018	1359 W CENTURY BLVD LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
G & S STATION, GEHAN KHAFAGY	176766	7/1/2020	1359 W CENTURY BLVD LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
G AND G AUTO BODY SHOP	149176	10/31/2019	11104 ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
G AND G AUTO BODY SHOP	149176	5/11/2021	11104 ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
G&M OIL CO, LLC #111	131145	6/5/2018	3742 S LA BREA AVE LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
G&M OIL CO, LLC #111	131145	6/5/2018	3742 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
G&M OIL CO, LLC #111	131145	11/17/2020	3742 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
G&M OIL CO, LLC #111	131145	7/15/2021	3742 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
G&M OIL CO., #15	189713	3/6/2020	3063 CRENSHAW BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
G&M OIL CO., #15	189713	2/10/2021	3063 CRENSHAW BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

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G&M OIL CO., #56	188707	12/6/2018	11000 S ATLANTIC AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
G&M OIL CO., #56	188707	2/5/2019	11000 S ATLANTIC AVE LYNWOOD, CA 90262	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
GALINDO CLEANERS	118665	4/29/2019	526 W ALONDRA BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GALINDO'S CLEANERS	126515	4/29/2019	817 S LONG BEACH BLVD COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GARDENA SHELL, MOHAMMAD I KASKAS	165049	1/9/2018	854 W EL SEGUNDO BLVD GARDENA, CA 90247	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GARDENA SHELL, MOHAMMAD I KASKAS	165049	9/14/2021	854 W EL SEGUNDO BLVD GARDENA, CA 90247	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
GARNER ENGINEERING INC	144474	2/17/2021	810 W 125TH ST LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
GAS 4 LESS, KARAM ABDALLA DBA	148171	5/4/2018	545 E ROSECRANS AVE GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
GAS 4 LESS, KARAM ABDALLA DBA	148171	7/26/2018	545 E ROSECRANS AVE GARDENA, CA 90248	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
GILAD INC	193009	7/9/2021	8514- S HOOVER 8526 ST LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
GILAD INC	193009	7/16/2021	8514- S HOOVER 8526 ST LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
GNC CLEANERS	183782	7/26/2019	2164 W SLAUSON LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GOLD STAR COLLISION CENTERS, INC.	129516	5/18/2018	1062 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
GOLDEN BODY AUTO SHOP	178479	8/8/2019	227 E FLORENCE AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GOMEZ WELDING & MFG & IRON WORK,R GOMEZ	132331	2/18/2020	6201 S WESTERN AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

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GRAIN CRAFT LLC	179761	9/25/2020	1861 E 55TH ST LOS ANGELES, CA 90058	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
GREEN LIGHT MOTORS INC	182909	4/10/2019	2819 W FLORENCE AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GREEN LIGHT MOTORS INC	182909	9/1/2020	2819 W FLORENCE AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
GUTIERREZ BODY SHOP	120322	3/28/2019	11914 S MAIN ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
GUZMAN ENERGY	185419	1/21/2020	635 W ROSECRANS AVE GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
GUZMAN ENERGY	185419	8/26/2020	635 W ROSECRANS AVE GARDENA, CA 90248	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
H&S ENERGY, LLC. H&S 24	160085	3/2/2018	850 W ROSECRANS AVE GARDENA, CA 90247	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
H&S ENERGY, LLC. H&S 24	160085	2/3/2021	850 W ROSECRANS AVE GARDENA, CA 90247	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HAN'S ENTERPRISE INC	142646	1/3/2019	5816 S WESTERN AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
HAN'S ENTERPRISE INC	142646	12/29/2020	5816 S WESTERN AVE LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HAN'S ENTERPRISE INC	142646	6/22/2021	5816 S WESTERN AVE LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HAWATMEH&HAWATMEH, INC	189641	8/12/2020	4380 W ADAMS BLVD LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
HAWATMEH&HAWATMEH, INC	189641	2/16/2021	4380 W ADAMS BLVD LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HELICOPTER TECHNOLOGY COMPANY	170140	5/7/2019	14610 S BROADWAY GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
HIS LIFE WOODWORKS INC	137138	11/22/2019	15107 S MAIN ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	10/9/2018	106 N LONG BEACH BLVD COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	9/19/2019	106 N LONG BEACH BLVD COMPTON, CA 90221	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	2/11/2020	106 N LONG BEACH BLVD COMPTON, CA 90221	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
HOME DEPOT #1039	146853	3/12/2020	1830 W SLAUSON AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
HOOPER & SONS, INC	27405	6/25/2019	11913 S COMPTON AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
HOOPER & SONS, INC	27405	6/25/2019	11913 S COMPTON AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HOOPER & SONS, INC	27405	6/30/2021	11913 S COMPTON AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HOOVER VALERO	154989	8/2/2018	9920 S HOOVER ST LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
HOOVER VALERO	154989	4/8/2020	9920 S HOOVER ST LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
HOOVER VALERO	154989	4/6/2021	9920 S HOOVER ST LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ICI ARCHITECTURAL MILLWORK	165059	1/31/2020	6824 BRYNHURST AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
INNO STAR INC., DARLING CLEANERS	160962	6/17/2019	4828 W ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
INNOVATIVE AUTO COLLISION	172334	8/9/2019	4061 S BROADWAY LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
J B CHEMICAL	139723	6/26/2019	14803 SPRING ST GARDENA, CA 90248	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
J&J AUTO CENTER, MARIO GARCIA	167592	3/14/2019	1549 W ADAMS BLVD LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
J.R. WELDING, INC.	187130	10/31/2019	11116 ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
J.R. WELDING, INC.	187130	5/5/2021	11116 ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED

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JASON'S ARCO & MINI-MART	98105	2/18/2020	2211 S HOOVER ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
JASON'S ARCO & MINI-MART	98105	1/21/2021	2211 S HOOVER ST LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
JASON'S ARCO & MINI-MART	98105	7/14/2021	2211 S HOOVER ST LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
JEFF'S CLEANERS	82776	5/13/2019	2165 W FLORENCE AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JERRY BODY SHOP	158790	3/24/2021	9014 S AVALON LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JEWELL CLEANERS	81974	5/13/2019	2432 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JIMENEZ BODY SHOP	180004	4/17/2018	632 E FLORENCE AVE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JIMENEZ BODY SHOP	180004	3/24/2021	632 E FLORENCE AVE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JMP BODY SHOP	176945	9/19/2019	4525 STAUNTON AVE LOS ANGELES, CA 90058	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JOHN SERVICE STATION, INC.	146595	9/21/2018	105 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
JOHN SERVICE STATION, INC.	146595	5/31/2019	105 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
JOHN SERVICE STATION, INC.	146595	5/21/2020	105 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
JOHN SERVICE STATION, INC.	146595	11/10/2020	105 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
JOHN SERVICE STATION, INC.	146595	5/12/2021	105 E EL SEGUNDO BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
JONES LUMBER CO INC	6438	5/18/2021	10711 S ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
JR BODY SHOP, JOSE A ENCINAS	151042	5/8/2019	10801 S ALAMEDA ST UNIT # 1/2 LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

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JR BODY SHOP, JOSE A ENCINAS	151042	5/5/2021	10801 S ALAMEDA ST UNIT # 1/2 LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
JUHASZ INC	21506	1/22/2019	4515 W ADAMS BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
JUNIOR AUTO BODY AND SALES	190564	1/22/2021	10803 S ALAMEDA 1/2 ST LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
KIM'S MOBIL INC	174744	6/21/2018	1803 W MANCHESTER BLVD LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
KNM AUTO SALES, INC.	184000	4/9/2019	3443 W 43RD ST LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
L & J DRY CLEANING, ALFRED HOWELL DBA	42127	5/2/2019	1601-03 W MANCHESTER BLVD LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
L A CO.,DEPT OF PUBLIC WORKS, AVIATION	1745	2/22/2018	901 W ALONDRA BLVD COMPTON, CA 90220	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
LA CITY DWP, MANHATTAN WELLS AMMONIATION	173372	11/12/2019	6219 S MANHATTAN PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LA CITY, DEPT OF GEN SERVICES	18793	2/25/2020	5860 S WILTON PL LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LA CO SHERIFF'S DEPT, FAC SERVS BUREAU	138071	12/29/2021	301 S WILLOWBROOK AVE COMPTON, CA 90220	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LA CO., HUDSON COMPREHENSIVE HEALTH CTR	16305	1/31/2019	2829 S GRAND AVE LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
LA CO., LYNWOOD REGIONAL JUSTICE CTR	73327	7/1/2021	11705 S ALAMEDA ST LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
LA CO., METROPOLITAN TRANS AUTHORITY	67869	3/4/2021	5425 S VAN NESS AVE DIV 5 LOS ANGELES, CA 90062	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

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LA CO., MUSEUM OF NATURAL HISTORY	12056	3/13/2019	900 W EXPOSITION BLVD LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
LA UNI SCH DIST, AUDUBON MIDDLE SCHOOL	72678	6/19/2020	4120 11TH AVE LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LA UNI SCH DIST, BSC BUS GARAGE	7937	3/13/2019	604 E 15TH ST LOS ANGELES, CA 90021	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
LA UNI SCH DIST, MARLTON SCHOOL	72790	6/19/2020	4000 SANTO TOMAS DR LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LA USD - BENNEKER BENJAMIN SCHOOL	82909	2/23/2021	14024 S SAN PEDRO ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LAUREL PLACE WEST HOLLYWOOD	167652	7/20/2021	535 W 41ST ST LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LDJ FURNITURE	179693	4/7/2018	738 E 59TH ST LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LEE'S ARCO	182885	12/18/2018	5804 S CRENSHAW BLVD LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
LEE'S ARCO	182885	12/10/2020	5804 S CRENSHAW BLVD LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LEE'S ARCO	182885	6/22/2021	5804 S CRENSHAW BLVD LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LEON'S AUTO WKS INC	9234	7/11/2018	1600 W FLORENCE AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LITTLE CRAFTS	17453	6/21/2019	2225 SOUTHWEST DR LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LOS ANGELES CHILD GUIDANCE CLINIC	133960	1/31/2019	3031 S VERMONT AVE LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LOS ANGELES FASHION CTR.	145432	10/23/2019	1458 SAN PEDRO ST LOS ANGELES, CA 90015	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LR ENVIRONMENTAL EQUIPMENT CO INC	151904	2/23/2021	12902 S SPRING ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
LS PETROLEUM INC	140850	7/12/2019	1403 W ADAMS AVE LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

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LS PETROLEUM INC	140850	4/1/2020	1403 W ADAMS AVE LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LS PETROLEUM INC	140850	4/6/2021	1403 W ADAMS AVE LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LS PETROLEUM INC	140850	10/7/2021	1403 W ADAMS AVE LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LUIS BODY SHOP	150573	5/17/2019	821 W FLORENCE AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
LUXURIOUS PROPERTIES LLC	188397	5/17/2019	6224 S FIGUEROA ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LUXURIOUS PROPERTIES LLC	188397	1/14/2020	6224 S FIGUEROA ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LUXURIOUS PROPERTIES LLC	188397	7/20/2020	6224 S FIGUEROA ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LYNWOOD 76	178032	4/6/2018	3501 E MARTIN LUTHER KING BLVD LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
LYNWOOD 76	178032	5/21/2021	3501 E MARTIN LUTHER KING BLVD LYNWOOD, CA 90262	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
LYNWOOD PETROLEUM, INC.	105544	8/9/2018	11401 S ATLANTIC AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
LYNWOOD PETROLEUM, INC.	105544	10/13/2021	11401 S ATLANTIC AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
M & M GAS STATION & MINI MART	133117	7/26/2018	343 W GAGE AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
M & M GAS STATION & MINI MART	133117	9/3/2020	343 W GAGE AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
M & M GAS STATION & MINI MART	133117	12/31/2020	343 W GAGE AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MAGIK AUTO BODY CORP	191537	10/15/2020	737 E WASHINGTON BLVD LOS ANGELES, CA 90021	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED

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MAGNESIUM ALLOY PROD. CO	10132	4/12/2019	2400-20 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MAIN ST. FUELS, INC., MAIN ST. FUELS DBA	181647	4/30/2019	1516 S MAIN ST LOS ANGELES, CA 90015	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MAIN ST. FUELS, INC., MAIN ST. FUELS DBA	181647	7/7/2021	1516 S MAIN ST LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MAIN STREET VALERO	154188	8/29/2018	11321 S MAIN ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
MARINA SHELL #1	177549	4/3/2018	1541 S CENTRAL AVE LOS ANGELES, CA 90021	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
MARINA SHELL #1	177549	11/24/2020	1541 S CENTRAL AVE LOS ANGELES, CA 90021	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MARINA SHELL #1	177549	11/19/2021	1541 S CENTRAL AVE LOS ANGELES, CA 90021	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MARQUEZ SERVICE STATION	143070	5/30/2018	2603 S CENTRAL ST LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
MARTIN LUTHER KING JR MEDICAL CAMPUS	2619	3/30/2018	12021 S WILMINGTON AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
MARTIN LUTHER KING JR MEDICAL CAMPUS	2619	7/3/2019	12021 S WILMINGTON AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
MARTIN LUTHER KING JR MEDICAL CAMPUS	2619	10/7/2020	12021 S WILMINGTON AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MASTER CAR AUTO BODY SHOP	179135	3/12/2019	5801 S CENTRAL AVE UNIT G LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MATCHMASTER DYEING & FINISHING INC	3029	2/20/2018	3700 S BROADWAY LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
MATCHMASTER DYEING & FINISHING INC	3029	11/1/2018	3700 S BROADWAY LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED

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MATCHMASTER DYEING & FINISHING INC	3029	10/4/2019	3700 S BROADWAY LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
MATCHMASTER DYEING & FINISHING INC	3029	4/24/2020	3700 S BROADWAY LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
MATCHMASTER DYEING & FINISHING INC	3029	4/24/2020	3700 S BROADWAY LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
MATCHMASTER DYEING & FINISHING INC	3029	6/16/2020	3700 S BROADWAY LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
MATCHMASTER DYEING & FINISHING INC	3029	12/10/2020	3700 S BROADWAY LOS ANGELES, CA 90007	EMISSIONS AUDIT	NOTICE OF VIOLATION ISSUED
MATCHMASTER DYEING & FINISHING INC	3029	12/15/2020	3700 S BROADWAY LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MATCHMASTER DYEING & FINISHING INC	3029	9/23/2021	3700 S BROADWAY LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
MAX'S CLEANERS, HONG JIN LEE	159327	6/19/2020	7124 S VERMONT AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MEADOW FARMS SAUSAGE CO INC	1918	2/18/2020	6215 S WESTERN AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
MENOS AUTO BODY REPAIR	193056	9/10/2020	4705 S NORMANDIE AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
MIDWEST FINISHES	155789	7/7/2020	5810 S NORMANDIE #1C LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MILLER'S CLEANERS	93019	6/17/2019	2339 W ROSECRANS AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
MONTEBELLO COLLISION CENTER	162044	1/10/2018	750 W WASHINGTON BLVD MONTEBELLO, CA 90640	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

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MONTES BODY, MARUYN MONTES DBA	152183	8/6/2019	6715 MCKINLEY AVE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
MORRELL'S ELECTRO PLATING, INC	136913	3/9/2018	432-36 E EUCLID AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MORRELL'S ELECTRO PLATING, INC	136913	3/9/2018	432-36 E EUCLID AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MORRELL'S ELECTRO PLATING, INC	136913	10/17/2018	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
MORRELL'S ELECTRO PLATING, INC	136913	2/27/2019	432-36 E EUCLID AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	6/26/2019	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MORRELL'S ELECTRO PLATING, INC	136913	9/11/2019	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	11/26/2019	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	2/27/2020	432-36 E EUCLID AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	4/29/2020	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MORRELL'S ELECTRO PLATING, INC	136913	9/22/2020	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MORRELL'S ELECTRO PLATING, INC	136913	12/10/2020	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
MORRELL'S ELECTRO PLATING, INC	136913	3/18/2021	432-36 E EUCLID AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	6/10/2021	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	9/3/2021	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
MORRELL'S ELECTRO PLATING, INC	136913	12/3/2021	432-36 E EUCLID AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

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MR KOOL'S COLLISION	189943	1/22/2021	4351 S BROADWAY LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
MY UNCLE'S CLEANERS	187129	9/5/2019	2724 MANCHESTER BLVD INGLEWOOD, CA 90305	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
NATURAL HISTORY MUSEUM LA	71864	3/13/2019	900 EXPOSITION BLVD LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
NEWMAN FREY ASSOCIATES INC	137466	12/11/2018	4917 W JEFFERSON BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
NICOLAS AGUIRRE	99517	4/22/2021	5707 ALBA ST LOS ANGELES, CA 90058	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
NIETO'S STATION	160499	8/2/2018	11025 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
NIETO'S STATION	160499	9/30/2020	11025 S FIGUEROA ST LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
NIKRAD ENTERPRISES INC	118537	2/21/2018	1400 W FLORENCE AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
NIKRAD ENTERPRISES INC	118537	2/3/2021	1400 W FLORENCE AVE LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
NIKRAD ENTERPRISES INC #1	103838	1/3/2019	3411 W FLORENCE AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
NIKRAD ENTERPRISES INC #1	103838	9/2/2020	3411 W FLORENCE AVE LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
NIKRAD ENTERPRISES INC #1	103838	3/9/2021	3411 W FLORENCE AVE LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
NIKRAD ENTERPRISES INC #1	103838	9/8/2021	3411 W FLORENCE AVE LOS ANGELES, CA 90043	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
NIKRAD ENTERPRISES INC #5	115702	9/7/2018	2545 S CRENSHAW LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
NIKRAD ENTERPRISES INC #5	115702	9/21/2018	2545 S CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
NIKRAD ENTERPRISES INC #5	115702	7/1/2020	2545 S CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
NIKRAD ENTERPRISES INC #5	115702	7/1/2021	2545 S CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
NOBLE'S AUTO BODY SHOP	179602	5/17/2019	815 W FLORENCE AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
NORMANDIE CLEANERS, LAURA NAJERA	124794	8/27/2020	1501 W JEFFERSON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
NORTHGATE MARKET	175570	4/17/2018	944 E SLAUSON AVE LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
ORIGINAL BODY SHOP, SALVADOR CABEZAS COR	187104	3/21/2018	3000 N ALAMEDA ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	2/16/2018	1501 N TAMARIND AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	7/30/2019	1501 N TAMARIND AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	11/16/2020	1501 N TAMARIND AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	9/17/2021	1501 N TAMARIND AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PACIFIC BELL TELEPHONE CO.	38414	8/7/2020	10600 S VERMONT AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PACIFIC BELL, AT&T CALIFORNIA	7176	8/7/2020	6900 S VERMONT AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PANROSE CORPORATION, INC.	166842	4/12/2018	1317 E WASHINGTON BLVD LOS ANGELES, CA 90021	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
PANROSE CORPORATION, INC.	166842	12/22/2020	1317 E WASHINGTON BLVD LOS ANGELES, CA 90021	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	2/5/2019	828 S LONG BEACH BLVD COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	9/8/2020	828 S LONG BEACH BLVD COMPTON, CA 90221	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
PARKLANE CLEANERS	100918	5/20/2019	4255 S VERMONT AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
PARKLANE CLEANERS	100918	3/12/2021	4255 S VERMONT AVE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
PCH OIL ENTERPRISE, INC	178023	2/26/2020	3100 W MANCHESTER BLVD INGLEWOOD, CA 90305	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
PERFECT PAINT & BODY	143923	6/10/2021	9640 S VERMONT AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
PERFORMANCE COMPOSITES, INC	140552	4/11/2018	1418-1518 S. ALAMEDA ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PERFORMANCE COMPOSITES, INC	140552	4/16/2019	1418-1518 S. ALAMEDA ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
PERFORMANCE COMPOSITES, INC	140552	5/26/2020	1418-1518 S. ALAMEDA ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PERFORMANCE COMPOSITES, INC	140552	6/9/2021	1418-1518 S. ALAMEDA ST COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
PHILLIPS 66 COMPANY	171527	1/29/2020	13900 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PHILLIPS 66 PIPELINE LLC	171326	3/29/2018	13500 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PHILLIPS 66 PIPELINE LLC	171326	5/30/2019	13500 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PHILLIPS 66 PIPELINE LLC	171326	12/23/2020	13500 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PHILLIPS 66 PIPELINE LLC	171326	5/3/2021	13500 S BROADWAY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	11/6/2019	2619 S CRENSHAW BLVD LOS ANGELES, CA 90016	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	11/7/2019	2619 S CRENSHAW BLVD LOS ANGELES, CA 90016	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	11/8/2019	2619 S CRENSHAW BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	6/16/2020	2619 S CRENSHAW BLVD LOS ANGELES, CA 90016	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	6/23/2020	2619 S CRENSHAW BLVD LOS ANGELES, CA 90016	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
PHR LA MART LLC	186775	1/15/2019	1933 S BROADWAY LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
PIDLUK INC	177666	1/14/2021	4424 S CENTRAL AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
PLANNED PARENTHOOD LOS ANGELES	156787	3/7/2019	400 W 30TH ST LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
POWER RUN OIL, LLC	169812	7/17/2020	249 E REDONDO BEACH BLVD LOS ANGELES, CA 90026	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
POWER RUN OIL, LLC (HOWARD)	169844	7/16/2020	1442 W 129TH ST (HOWARD) LOS ANGELES, CA 90047	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
PRESTIGE AUTO BODY & PAINT	189445	4/10/2019	10700 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
QAP METAL FINISHING	182848	2/28/2020	350 W 130TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
QAP METAL FINISHING	182848	4/15/2020	350 W 130TH ST LOS ANGELES, CA 90061	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
QUALITY CLEANERS, ELIAS ZACARIAS DBA	147644	6/17/2019	7303 S SAN PEDRO ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
RAFFI'S CHEVRON	128753	1/4/2018	2538 CRENSHAW BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
RAFFI'S CHEVRON	128753	1/19/2021	2538 CRENSHAW BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
RAINBOW OIL, INC #99003	178757	4/9/2019	650 E WASHINGTON BLVD LOS ANGELES, CA 90015	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
RAINBOW OIL, INC #99003	178757	4/7/2020	650 E WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
RAINBOW OIL, INC #99003	178757	4/13/2021	650 E WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
RAINBOW OIL, INC #99003	178757	4/20/2021	650 E WASHINGTON BLVD LOS ANGELES, CA 90015	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
RASHID & SONS INC	137111	7/27/2018	6303 S FIGUEROA ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
RASHID & SONS INC	137111	10/31/2019	6303 S FIGUEROA ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
RASHID & SONS INC	137111	11/14/2019	6303 S FIGUEROA ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
REA CLEANERS INC	110751	7/8/2020	4455 AVALON BLVD LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
REBORN ANTIQUES	166563	2/7/2020	1950 W 62ND ST LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
RELIANCE CLEANERS	35472	4/29/2019	657 W IMPERIAL HWY LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
RICHARD'S SHELL STATION	169438	3/20/2018	700 E ROSECRANS AVE COMPTON, CA 90221	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
RICHARD'S SHELL STATION	169438	12/30/2020	700 E ROSECRANS AVE COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
RIVKAH, INC.	136643	10/31/2019	5407 S NORMANDIE LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
RIVKAH, INC.	136643	3/30/2021	5407 S NORMANDIE LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
RIVKAH, INC.	136643	12/28/2021	5407 S NORMANDIE LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

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ROBERTO'S BODY N PAINT	122570	7/25/2019	503 N ALAMEDA COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ROBERTSON'S READY MIX	134112	2/9/2018	301 W ROSECRANS AVE GARDENA, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
ROBERTSON'S READY MIX	134112	2/19/2019	301 W ROSECRANS AVE GARDENA, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ROBERTSON'S READY MIX	134112	10/7/2021	301 W ROSECRANS AVE GARDENA, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ROOP CORPORATION	172857	5/25/2021	4351 E ROSECRANS AVE COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ROOP CORPORATION	172857	6/18/2021	4351 E ROSECRANS AVE COMPTON, CA 90221	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ROOP CORPORATION	172857	6/22/2021	4351 E ROSECRANS AVE COMPTON, CA 90221	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
ROSECRANS ENERGY	156312	4/26/2019	14147 FIGUEROA LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
ROSEY'S AUTO SERV CTR	21671	7/12/2019	2601 W FLORENCE AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
RUBENS BODY SHOP	177052	7/23/2020	4325 AVALON BLVD LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	1/2/2018	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	2/13/2018	2727 N COMPTON AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	5/2/2018	2727 N COMPTON AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	9/11/2018	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
S & K PLATING INC	15021	11/20/2018	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
S & K PLATING INC	15021	3/19/2019	2727 N COMPTON AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	6/6/2019	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
S & K PLATING INC	15021	9/3/2019	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	3/11/2020	2727 N COMPTON AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
S & K PLATING INC	15021	5/26/2020	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
S & K PLATING INC	15021	8/21/2020	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
S & K PLATING INC	15021	3/31/2021	2727 N COMPTON AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
S & K PLATING INC	15021	9/13/2021	2727 N COMPTON AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SA RECYCLING, LLC	193551	11/17/2020	10313 S ALAMEDA ST LOS ANGELES, CA 90002	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
SA RECYCLING, LLC	193551	1/26/2021	10313 S ALAMEDA ST LOS ANGELES, CA 90002	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SAM'S CHEVRON	153477	9/12/2018	2546 S LA BREA AVE LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
SAM'S CHEVRON	153477	4/2/2019	2546 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
SAM'S CHEVRON	153477	4/28/2020	2546 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SAM'S CHEVRON	153477	10/21/2020	2546 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SAM'S CHEVRON	153477	4/27/2021	2546 S LA BREA AVE LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SANG HAN ENTERPRISE INC	142730	8/14/2018	3774 S WESTERN AVE LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SANG HAN ENTERPRISE INC	142730	8/30/2018	3774 S WESTERN AVE LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
SANG HAN ENTERPRISE INC	142730	8/30/2018	3774 S WESTERN AVE LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
SANG HAN ENTERPRISE INC	142730	8/26/2020	3774 S WESTERN AVE LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

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SANG HAN ENTERPRISE INC	142730	2/23/2021	3774 S WESTERN AVE LOS ANGELES, CA 90018	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SANTA FE FUEL INC.	174065	4/23/2019	1285 E VERNON AVE LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SANTA FE FUEL INC.	174065	10/27/2020	1285 E VERNON AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SANTA FE FUEL INC.	174065	4/27/2021	1285 E VERNON AVE LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
SENTINEL PEAK RESOURCES CALIFORNIA LLC	184292	3/7/2018	1371 W JEFFERSON BLVD LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA LLC	184292	8/18/2020	1371 W JEFFERSON BLVD LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA LLC	184292	3/2/2021	1371 W JEFFERSON BLVD LOS ANGELES, CA 90007	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA LLC	184292	3/2/2021	1371 W JEFFERSON BLVD LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA, LLC	184301	4/13/2018	5640 S FAIRFAX AVE LOS ANGELES, CA 90056	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA, LLC	184301	6/18/2018	5640 S FAIRFAX AVE LOS ANGELES, CA 90056	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
SENTINEL PEAK RESOURCES CALIFORNIA, LLC	184301	11/15/2019	5640 S FAIRFAX AVE LOS ANGELES, CA 90056	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA, LLC	184301	11/12/2020	5640 S FAIRFAX AVE LOS ANGELES, CA 90056	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SENTINEL PEAK RESOURCES CALIFORNIA, LLC	184301	11/22/2021	5640 S FAIRFAX AVE LOS ANGELES, CA 90056	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

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SHARZAD PETROLEUM ENTERPRISES CORP	125254	6/11/2019	1355 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SIERRA FURNITURE, INC.	152107	3/14/2019	701 E 60TH ST LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
SIERRA FURNITURE, INC.	152107	10/17/2019	701 E 60TH ST LOS ANGELES, CA 90001	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	8/7/2018	254 W SLAUSON AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	8/10/2018	254 W SLAUSON AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	8/4/2020	254 W SLAUSON AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	2/9/2021	254 W SLAUSON AVE LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SO LA CHESTERFIELD SQUARE ANIMAL SRV CTR	192139	5/21/2020	1850 W 60TH ST LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SOUTH BAY KEIRO NURSING HOME	168221	6/27/2018	15115 S VERMONT AVE GARDENA, CA 90247	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SOUTH BAY RETIREMENT RESIDENCE INC	107090	3/29/2019	1001 W CRESSEY ST COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SOUTH CITY GAS	137146	2/20/2018	449 W IMPERIAL HWY LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SOUTH CITY GAS	137146	6/28/2018	449 W IMPERIAL HWY LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
SOUTH CITY GAS	137146	2/11/2021	449 W IMPERIAL HWY LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SPECTRUM PLATING CO	142710	4/15/2020	202 W 140TH ST LOS ANGELES, CA 90061	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
SPECTRUM PLATING CO	142710	11/4/2020	202 W 140TH ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
ST JOHN OF GOD RETIREMENT & CARE CENTER	129341	1/18/2019	2458 S ST ANDREWS PL LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ST JOHN OF GOD RETIREMENT & CARE CENTER	141134	1/18/2019	2468 S ST ANDREWS PL LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
ST JOHN OF GOD RETIREMENT & CARE CTR COR	107554	1/18/2019	2015 W ADAMS BLVD LOS ANGELES, CA 90018	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	3/21/2018	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
STUTZMAN PLATING CO	18845	6/20/2018	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	6/20/2018	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	8/22/2018	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	3/18/2019	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
STUTZMAN PLATING CO	18845	5/3/2019	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	7/29/2019	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	2/21/2020	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
STUTZMAN PLATING CO	18845	3/22/2021	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	5/10/2021	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
STUTZMAN PLATING CO	18845	9/1/2021	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
STUTZMAN PLATING CO	18845	11/15/2021	5025-37 W EXPOSITION BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	INVESTIGATION IN PROGRESS
SUPERIOR GROCERS	161316	9/15/2020	2000 S CENTRAL AVE LOS ANGELES, CA 90012	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SUPERIOR GROCERS	161316	2/19/2021	2000 S CENTRAL AVE LOS ANGELES, CA 90012	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SUPERIOR GROCERS	161325	4/29/2021	5824 S VERMONT AVE # 116 LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	3/28/2019	1344 W SLAUSON AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	3/28/2019	1344 W SLAUSON AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	6/14/2019	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
SW PLATING CO	9489	8/22/2019	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
SW PLATING CO	9489	8/22/2019	1344 W SLAUSON AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	11/8/2019	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	1/24/2020	1344 W SLAUSON AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	2/20/2020	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
SW PLATING CO	9489	5/7/2020	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	9/1/2020	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	10/29/2020	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	6/7/2021	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	7/12/2021	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SW PLATING CO	9489	8/16/2021	1344 W SLAUSON AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
SWISSTEX CALIFORNIA INC.	110096	3/6/2020	13660 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
SWISSTEX CALIFORNIA INC.	110096	2/25/2021	13660 S FIGUEROA ST LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
TESORO (USA) 63130	171548	6/11/2019	600 E ROSECRANS AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
TESORO (USA) 63130	171548	4/22/2020	600 E ROSECRANS AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
TESORO (USA) 63130	171548	10/29/2020	600 E ROSECRANS AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
THE GOOD SHEPARD MANOR	115709	1/31/2020	4411 ELEVENTH ST LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
THE HOME DEPOT, U.S.A. INC.	122737	7/30/2019	3363 CENTURY BLVD INGLEWOOD, CA 90301	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
T-MOBILE	185410	3/29/2019	127 N WILMINGTON AVE COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
TTVV CORP	187218	3/22/2019	1515 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90062	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
U S CLEANERS	111454	6/3/2019	4832 S WESTERN AVE LOS ANGELES, CA 90062	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
ULTRA BODY SHOP INC	151440	3/12/2019	135 W FLORENCE AVE LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	4/3/2018	MCCLINTOCK W 34TH CHILDS ST LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	6/19/2019	MCCLINTOCK W 34TH CHILDS ST LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	6/18/2020	MCCLINTOCK W 34TH CHILDS ST LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	6/16/2021	MCCLINTOCK W 34TH CHILDS ST LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
UNIV OF SO CAL/UNIV PARK CAMPUS	110789	4/5/2018	734 ADAMS W LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
UNIVERSAL MOLDING CO.	35565	9/12/2018	10840 DRURY LN LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
UNIVERSAL MOLDING COMPANY	91591	3/4/2021	10807 STANFORD AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
UNIVERSAL MOLDING COMPANY	145216	3/5/2021	10806 STANFORD AVE LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
UNIVERSITY SO CALIFORNIA, UNIV PK CAMPUS	120190	4/5/2018	3025 ROYAL ST TROY HALL APTS LOS ANGELES, CA 90089	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
US GASOLINE #2 INC	180478	2/16/2018	12706 S CENTRAL AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
US GASOLINE #2 INC	180478	2/20/2018	12706 S CENTRAL AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
US GASOLINE #2 INC	180478	10/5/2018	12706 S CENTRAL AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
US GASOLINE #2 INC	180478	10/5/2018	12706 S CENTRAL AVE LOS ANGELES, CA 90059	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
US GASOLINE #2 INC	180478	2/24/2021	12706 S CENTRAL AVE LOS ANGELES, CA 90059	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
V&M AEROSPACE LLC	180918	3/15/2018	14024 S AVALON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
V&M AEROSPACE LLC	180918	3/29/2019	14024 S AVALON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
V&M AEROSPACE LLC	180918	6/12/2019	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
V&M AEROSPACE LLC	180918	8/13/2019	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
V&M AEROSPACE LLC	180918	12/11/2019	14024 S AVALON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
V&M AEROSPACE LLC	180918	7/7/2020	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
V&M AEROSPACE LLC	180918	9/22/2020	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	INVESTIGATION IN PROGRESS
V&M AEROSPACE LLC	180918	3/31/2021	14024 S AVALON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
V&M AEROSPACE LLC	180918	6/28/2021	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
V&M AEROSPACE LLC	180918	8/16/2021	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
V&M AEROSPACE LLC	180918	11/15/2021	14024 S AVALON BLVD LOS ANGELES, CA 90061	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALENCE SURFACE TECHNOLOGIES - LYNWOOD	188380	3/25/2019	2605 INDUSTRY WAY LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALENCE SURFACE TECHNOLOGIES - LYNWOOD	188380	6/12/2020	2605 INDUSTRY WAY LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALENCE SURFACE TECHNOLOGIES - LYNWOOD	188380	9/9/2020	2605 INDUSTRY WAY LYNWOOD, CA 90262	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALENCE SURFACE TECHNOLOGIES - LYNWOOD	188380	5/17/2021	2605 INDUSTRY WAY LYNWOOD, CA 90262	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
VALERO DLR JAMES LEE, JAMES SERVICE CTR	18796	7/5/2019	3950 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
VALERO DLR JAMES LEE, JAMES SERVICE CTR	18796	12/8/2020	3950 W MARTIN LUTHER KING BLVD LOS ANGELES, CA 90008	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALERO DLR, FLORENTINO C APELES	58990	11/27/2018	2217 S NORMANDIE AVE LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
VALERO DLR, FLORENTINO C APELES	58990	4/8/2020	2217 S NORMANDIE AVE LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALERO DLR, FLORENTINO C APELES	58990	10/22/2020	2217 S NORMANDIE AVE LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALERO DLR, FLORENTINO C APELES	58990	4/8/2021	2217 S NORMANDIE AVE LOS ANGELES, CA 90007	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VALERO, THREE FOUR INC.	147549	12/27/2018	4404 S WESTERN AVE LOS ANGELES, CA 90062	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
VALERO, THREE FOUR INC.	147549	8/18/2020	4404 S WESTERN AVE LOS ANGELES, CA 90062	TARGETED RULE INSPECTION	NOTICE TO COMPLY ISSUED
VALERO, THREE FOUR INC.	147549	1/21/2021	4404 S WESTERN AVE LOS ANGELES, CA 90062	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VEER CRENSHAW PARTNERS INC	189132	1/24/2019	3412 CRENSHAW LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
VEER CRENSHAW PARTNERS INC	189132	9/9/2020	3412 CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VEER CRENSHAW PARTNERS INC	189132	3/16/2021	3412 CRENSHAW LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VEER FUEL PARTNERS INC	187052	5/8/2018	2050 W MANCHESTER AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
VEER FUEL PARTNERS INC	187052	5/8/2018	2050 W MANCHESTER AVE LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VEER FUEL PARTNERS INC	187052	5/12/2020	2050 W MANCHESTER AVE LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VEER FUEL PARTNERS INC	187052	5/11/2021	2050 W MANCHESTER AVE LOS ANGELES, CA 90047	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
VERMONT FUEL, INC.	161396	1/10/2020	2202 S VERMONT AVE LOS ANGELES, CA 90007	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
VERNON FUEL DIS INC	118622	5/24/2019	4321 S ALAMEDA ST LOS ANGELES, CA 90058	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
VERSA PRODUCTS, INC.	149352	3/4/2021	14105 S AVALON BLVD LOS ANGELES, CA 90061	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
VICTORY POWDER COATING & SANDBLASTING IN	178026	5/18/2018	330 W 58TH ST UNIT B LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
VICTORY POWDER COATING & SANDBLASTING IN	178026	10/4/2019	330 W 58TH ST UNIT B LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
VICTORY POWDER COATING & SANDBLASTING IN	178026	4/29/2020	330 W 58TH ST UNIT B LOS ANGELES, CA 90037	SURVEILLANCE ONLY	INVESTIGATION IN PROGRESS
VICTORY POWDER COATING & SANDBLASTING IN	178026	4/30/2020	330 W 58TH ST UNIT B LOS ANGELES, CA 90037	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
VICTORY POWDER COATING & SANDBLASTING IN	178026	5/1/2020	330 W 58TH ST UNIT B LOS ANGELES, CA 90037	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
VILLA CLEANERS	95193	1/23/2019	14329 S CENTRAL AVE COMPTON, CA 90220	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
WALSH SHEA CORRIDOR CONSTRUCTORS	186308	4/10/2019	6720 VICTORIA AVE LOS ANGELES, CA 90043	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
WEST ADAMS PETROLEUM INC	184882	8/14/2018	1691 W ADAMS BLVD LOS ANGELES, CA 90004	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
WEST ADAMS PETROLEUM INC	184882	5/14/2019	1691 W ADAMS BLVD LOS ANGELES, CA 90004	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
WEST COAST METAL FINISHING	119682	4/4/2018	5722 BANDERA ST VERNON, CA 90058	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
WEST COAST METAL FINISHING	119682	4/7/2020	5722 BANDERA ST VERNON, CA 90058	SURVEILLANCE ONLY	NO ENFORCEMENT ACTION TAKEN
WEST SHOP CF	191816	2/18/2020	6231 S MANHATTAN PL # I LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
WESTERN AUTO BODY & PAINT REPAIR	162773	5/1/2019	7401 S WESTERN AVE LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
WINALL OIL CO #2	33824	6/28/2018	615 W FLORENCE AVE LOS ANGELES, CA 90044	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
WINALL OIL CO #2	33824	5/19/2020	615 W FLORENCE AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
WINALL OIL CO #2	33824	5/18/2021	615 W FLORENCE AVE LOS ANGELES, CA 90044	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
WINALL OIL CO #9	27306	4/30/2019	4442 S AVALON LOS ANGELES, CA 90011	EQUIPMENT LIST INSPECTION	NOTICE OF VIOLATION ISSUED
WINALL OIL CO #9	27306	11/12/2020	4442 S AVALON LOS ANGELES, CA 90011	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
WISE LIVING	167612	3/6/2020	2001 W 60TH ST LOS ANGELES, CA 90047	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
WOODY'S BARBECUE	182185	3/5/2020	1958 W FLORENCE AVE LOS ANGELES, CA 90008	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN
WORLD OIL MARKETING CO #1	1261	6/15/2018	7201 S SAN PEDRO ST LOS ANGELES, CA 90003	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
WORLD OIL MARKETING CO #1	1261	7/23/2019	7201 S SAN PEDRO ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
WORLD OIL MARKETING CO #1	1261	8/19/2020	7201 S SAN PEDRO ST LOS ANGELES, CA 90003	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
YOUNG'S SHELL	163546	3/5/2019	4403 S FIGUEROA ST LOS ANGELES, CA 90037	EQUIPMENT LIST INSPECTION	NO ENFORCEMENT ACTION TAKEN

Facility Name	Facility ID	Inspection Date	Address	Assignment Activity Description	Disposition
YOUNG'S SHELL	163546	3/5/2019	4403 S FIGUEROA ST LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
YOUNG'S SHELL	163546	9/4/2020	4403 S FIGUEROA ST LOS ANGELES, CA 90037	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
Z & R OIL COMPANY	140519	3/15/2018	3300 S LA CIENEGA BLVD LOS ANGELES, CA 90016	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
Z & R OIL COMPANY	140519	7/12/2018	3300 S LA CIENEGA BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NOTICE OF VIOLATION ISSUED
Z & R OIL COMPANY	140519	7/29/2020	3300 S LA CIENEGA BLVD LOS ANGELES, CA 90016	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ZIBA INVESTMENT CORP	133145	3/20/2018	740 W ROSECRANS AVE COMPTON, CA 90222	EQUIPMENT LIST INSPECTION	NOTICE TO COMPLY ISSUED
ZIBA INVESTMENT CORP	133145	9/2/2020	740 W ROSECRANS AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN
ZIBA INVESTMENT CORP	133145	3/9/2021	740 W ROSECRANS AVE COMPTON, CA 90222	TARGETED RULE INSPECTION	NO ENFORCEMENT ACTION TAKEN

Table A4-4: NOV and NC List from 2018 through 2021 in SLA

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
14221 FIGUEROA	188036	NOV	P77344	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 5988
1924 WEST ALONDRA BLVD	193347	NC	E53188	8/25/2021	8/2/2021	461	Maintain an April / October test schedule _ conduct next Vapor Recovery test in April 2022 (Performance Test was 04/15/2021), last test conducted early on 08/02/2021

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
3775 VERMONT	188031	NOV	P77340	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 2280 0002 0330 6317
3927 WISCONSIN LLC	191332	NOV	P67484	12/3/2019	8/14/2019	1403	Failure to notify the District prior to demolition and prior to removal of asbestos greater than 100 square feet. Failure to remove all ACM & PACM prior to demolition.
3927 WISCONSIN LLC	191332	NC	E50856	6/17/2020	6/17/2020	403	No person shall allow trackout to extend 25 feet or more in cumulative length from the point of origin from an active operation. All trackout from an active operation shall be removed at the conclusion of each workday or evening shift.
4530 COLISEUM STREET _ BEN BEROU	194260	NC	G11380	7/7/2021	7/7/2021	1403	Prior to continuing any renovation, demolition, or cleanup activity, secure and stabilize all of unit #s 5 and 19, have a certified asbestos consultant (CAC) perform an asbestos contamination assessment of all of unit #s 5 and 19, for verified asbestos
4530 COLISEUM STREET _ BEN BEROU	194260	NC	F11479	11/10/2021	11/9/2021	1403, 40701(G), 42303	Please provide evidence and copies of a prior asbestos survey, asbestos removal notifications, CSLB/DOSH licenses, AHERA training certificates, supervisor logs, hazardous waste manifests, hazardous waste generator labels, identify the location where
4530 COLISEUM STREET _ BEN BEROU	194260	NC	G11427	11/10/2021	11/9/2021	1403	Please secure and stabilize unit #17, have a CAC conduct a contamination assessment of unit #17, prepare a Procedure 5 cleanup plan.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
A AND B CENTRAL, INC., DBA ANDY'S SHELL	147056	NOV	P72212	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 1219
A AND B LONG BEACH INC	176130	NOV	P72650	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 6203
A AND B LONG BEACH INC	176130	NC	E46344	12/28/2018	12/28/2018	461, 461 (C)(2)(B)	Repair/replace torn boots on nozzles 5, 8, 9, and 10. Repair/replace torn faceplates on nozzles 4 and 10. Maintain VST weekly inspections. Maintain vapor recovery daily maintenance inspections. Ensure AQMD required "nozzle problem"
A AND B LONG BEACH INC	176130	NOV	P67695	3/7/2019	3/2/2019	461(C)(3)(Q)	Failure to submit 2018 monthly gasoline throughput data by March 1st, 2019 due date.
A AND B LONG BEACH INC	176130	NC	E24012	4/24/2019	4/24/2019	461	Missing AQMD toll-free number on dispensers (800_242_4020).
A M OIL	153912	NOV	P72301	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 2063
A M OIL	153912	NC	E48772	7/9/2019	7/9/2019	461	Provide current 2019 Daily Maintenance and VST Weekly Interlock Maintenance/Inspection records

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
A M OIL	153912	NOV	P68445	7/9/2019	7/9/2019	461, 41960	Failure to maintain gasoline dispensing facility system in good working order in accordance with the manufacturer's specification of the certified system; Operating a gasoline dispensing system contrary to CARB Executive Order, Including the IOM -
A_1 CLASSIC AUTO BODY & PAINT	139313	NC	E50565	12/27/2019	12/27/2019	109, 203	_Apply for SCAQMD permit for spray booth (Do not operate until submittal of application), _Keep records of paints sprayed in spray booth
A_1 CLASSIC AUTO BODY & PAINT	139313	NC	E52588	12/3/2020	12/3/2020	203	Obtain Permit to operate prior to using spray booth again.
A_1 CLASSIC AUTO BODY & PAINT	139313	NOV	P69545	5/26/2021	5/26/2021	109, 203	Operating spray booth without a permit to operate and failure to keep proper paint usage records
AAA PLATING & INSPECTION, INC	25087	NC	E42782	2/23/2018	2/13/2018	203	Submit permit applications for nonpermitted tanks (see original NC for details)
AAA PLATING & INSPECTION, INC	25087	NC	E42783	2/23/2018	2/13/2018	42303	Provide VOC records for pressure gauge readings, provide process tank information and SDS for lines in IVD room
AAMES SERVICE INC., KIM'S UNION 76	147273	NOV	P72216	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 1257
AAMES SERVICE INC., KIM'S UNION 76	147273	NC	E50815	3/11/2020	3/11/2020	461	Contact Veeder_Root Technician to diagnose and repair reoccurring "Readiness ISD" event

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
AC BODY SHOP AND AUTO MECH.	58606	NC	E47097	9/26/2019	9/26/2019	203, 1151	_ Make sure manometer is in good operating condition and all filters prior to operation, _ Keep usage records of paint/solvent on a daily basis, _ Remove all old noncompliant paints/solvents from site
ACE FUELS INC	185608	NOV	P77290	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 2280 0002 0330 5792
ACS BODY & PAINT	182422	NC	E49728	2/4/2020	2/4/2020	42303	provide spray log showing coating & solvent usage for the past 12 months
ACS BODY & PAINT	182422	NC	E49729	2/4/2020	2/4/2020	1151, 1171	remove non-compliant coating (grow reducer 1370) and solvent (sem solve)
ACTIVE RECYCLING CO INC	18284	NC	E42882	2/28/2018	2/28/2018	403(D)(2)	R403(d)(2) Utilize Best Available Control Measures (BACM) to minimize fugitive dust emissions from each fugitive dust source type with the active operation
ADVANCE PAPER BOX CO	47084	NC	E48307	7/25/2019	7/25/2019	42303	provide proof of 222 registration for AC unit and provide maintenance report. Provide coolant information for two (2) chillers brand Guntner and Larkin.
ADVANCE PAPER BOX CO	47084	NOV	P69571	8/14/2019	7/25/2019	1415	Failure to submit registration plan every 2 years after initial registration for AC refrigerants >50 pounds per circuit.
ADVANCE PAPER BOX CO	47084	NOV	P73657	9/10/2020	3/1/2020	3002(C)(1)	late 500-SAM2, late 500-ACC
ADVANCE PAPER BOX CO	47084	NC	E53299	6/23/2021	6/23/2021	203 (A), 3002(C)(1)	1) Resubmit form 500_ACC with corrected due date. 2) Apply for a permit to operate for G43438's dust collector.
AHMED UNION 76	155446	NOV	P72336	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							Certified Mail Tracking #7018 0680 0001 2738 2407
AHMED UNION 76	155446	NC	E48587	6/14/2019	6/14/2019	203 (B), 461(C)(2)(B)	Provide/maintain 2019 ISD alarm log_ include all instances of alarms, alarm clears & repairs. Repair/replace: torn boots at FP # 1 & 9, loose boot at FP #3, sticky insertion interlock mechanism at FP #3.
AHMED UNION 76	155446	NOV	P69013	6/14/2019	6/14/2019	461, 461(C)(2)(B), 41960.2	Failure to maintain gasoline dispensing system in good working order in accordance with the manufacturer's specification of the certified system. Operating a gasoline dispensing system contrary to CARB executive order;
AIRCOAT, INC.	113761	NC	E44740	7/6/2018	7/6/2018	1147	R1147 Demonstrate and provide proof that the burner for permit F9651 is in compliance with Rule 1147 and that the NOx emissions are below 30 ppm.
AIRGAS USA, INC.	164982	NC	E51807	2/25/2021	2/25/2021	109	1) begin maintaining a VOC usage log of all coatings used.
AIRGAS USA, LLC	108370	NC	E53257	6/24/2021	6/24/2021	203 (B)	Scrubber solution supply to the venturi unit shall not be less than 95 gpm
AJAX FORGE CO	19515	NOV	P65216	3/8/2018	3/8/2018	203 (A)	A person shall not operate any equipment which may cause the issuance of air contaminants without first obtaining a permit
AJAX FORGE CO	19515	NOV	P69533	11/6/2019	1/31/2019	202(A)	Failure to submit required source test protocol.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
AL QAYYUM OIL CORPORATION	140073	NC	E44863	7/26/2018	7/26/2018	203 (B), 206, 461	Provide complete records of ISD alarm logs. Ensure Permit #N29935 is posted. Ensure 91 tank vapor side lid can be opened. Replace torn boots on nozzles 2, 3, 4, 6, and 7. Provide VST weekly inspection records. Ensure Rule 461 required signage is
AL QAYYUM OIL CORPORATION	140073	NOV	P67679	10/2/2018	12/22/2016	203(B), 461, 461 (C)(1)(A), 461 (C)(2)(B), 461 (E)(2)(A)	Failure to record all ISD alarms and associated repairs on an ISD alarm log. Resetting ISD alarms without proof of repairs. Misuse of the clear test after repair (reset) function. Failure to maintain Phase I equipment according to CARB executive orders
AL QAYYUM OIL CORPORATION	140073	NOV	P67687	1/9/2019	10/3/2018	203(B), 461, 461 (C)(1)(A), 461 (C)(2)(B)	Failure to maintain Phase I according to CARB Executive Orders and manufacturer's specification. Failure to maintain VST weekly insertion interlock inspections. Failure to maintain vapor recovery daily maintenance inspections. Resetting ISD system without
AL QAYYUM OIL CORPORATION	140073	NOV	P76859	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4042
AL QAYYUM OIL CORPORATION	140073	NC	E50824	10/22/2020	10/22/2020	461	Facility conducted early testing on 10/22/20 despite having a December test schedule. Conduct next Reverification Test in December 2021 and remain on schedule.
ALAMEDA FUEL	173007	NOV	P72570	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							Certified Mail Tracking #7018 0040 0000 1659 7088
ALAMEDA FUEL	173007	NOV	P68439	6/7/2019	3/2/2018	461	Failure to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1st following each calendar year: 2017 data (due 03/01/18) and 2018 (due 03/01/19)
ALAMEDA FUEL	173007	NOV	P70227	5/20/2020	2/5/2020	203	Operating without a valid permit to operate
ALBERTO'S FINE ART'S FURNITURE	139609	NC	E42898	6/6/2018	6/6/2018	109, 203 (B)	R109 Keep VOC usage records, R203(b) keep PSB in proper operating conditions in accordance with permit F67331: fix manometer, fix filters
ALERT CLEANERS, BENJAMIN HURTADO	115285	NC	E52606	10/6/2021	10/6/2021	1102, 1146.2	Provide 2019 records for the drycleaner. Provide 2019 and 2020 gas bills.
ALEX CLEANERS	134482	NC	E46851	4/29/2019	4/29/2019	1402, 1421	Begin keeping records required for PERC machine per rule 1421. Submit HRA within 90 days.
ALEX CLEANERS	134482	NOV	P69507	4/29/2019	2/21/2018	203 (A), 1421	Operating equipment without a permit to operate. Failure to renew ATCM certificate before the expiration date.
ALEX CLEANERS	134482	NC	E52608	10/6/2021	10/6/2021	1102	Begin keeping required records
ALL SEASON AUTO BODY & PAINT INC	180804	NC	E46883	5/2/2019	5/2/2019	42303	provide a record of all VOC containing coatings and solvents used for the past 12 months. Provide a receipt for hazardous waste manifest
ALL SEASON AUTO BODY & PAINT INC	180804	NC	E46884	5/2/2019	5/2/2019	1151, 1171, 203 (B)	remove non-compliant primer and solvents. install manometer on spray booth.
ALLENCO ENERGY INC.	161814	NOV	P66523	9/16/2019	9/16/2019	1173	Leak greater than 100,000 ppm detected on well Saint James #10; more specifically on clamp component on said well.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
ALLENCO ENERGY INC.	161814	NOV	P66524	9/17/2019	9/17/2019	1173	Leak greater than 50,000 ppm detected on stainless steel connection (hose) on microturbine #3.
ALLENCO ENERGY INC.	161814	NC	E40795	9/18/2019	9/18/2019	1173	(1)Repair leak on flange downstream of component tag #0007. (2) Repair Leak on nut/bolt on packing rod on Saint James Well #10. (3) Repair leak on nut/bolt on packing rode on Saint James Well #4.
ALLENCO ENERGY INC.	161814	NOV	P66525	9/18/2019	9/18/2019	1173	Leaks greater than 100,000 ppm detected on (1) pressure gauge downstream of component tag #0014, (2) nut/bolt on packing rod on Saint James Well #8, (3) flange (2 inch) of gas line on Saint James Well #4 connecting to facility gas line (4 inch).
ALLENCO ENERGY INC.	161814	NOV	P66528	9/26/2019	9/26/2019	1173	Leak greater than 100,000 ppm detected on four components. Failed to repair leaks within allowed time period.
ALLENCO ENERGY INC.	161814	NOV	P66529	10/4/2019	10/4/2019	1173	Leak greater than 100,000 ppm detected on bottom of pressure gauge of casing on SJ #3.
ALLENCO ENERGY INC.	161814	NOV	P66531	10/11/2019	10/11/2019	1173	Leak greater than 100,000 ppm detected on component.
ALLENCO ENERGY INC.	161814	NC	E46504	3/6/2020	3/6/2020	1173(G)(1)	Repair the following leaks in accordance with Table 2 of Rule 1173: Well SJ8 2,000 ppm @ bolt; Well SJ3 _ 9,000 ppm @ valve stem (Tag #0259); Well SJ3 _ 2,000 ppm @ pressure gauge; Microturbine _ 15,000 ppm @ scrubber fisher regulator
ALLENCO ENERGY INC.	161814	NOV	P73257	3/6/2020	3/6/2020	1173	One leak over 50,000 ppm detected at regulator for microturbine

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ALLIED WASTE SERVICES	158682	NOV	P71744	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 3380 0000 7803 4658
ALONDRA OIL INC	185262	NC	E50830	2/11/2021	2/11/2021	461	Conduct next Reverification Test in the month of July 2021 to remain on a January / July Test Schedule (last Performance Test conducted on 07/10/2021)
ALPHA CENTURION	55129	NC	E53254	6/16/2021	6/16/2021	203 (B)	Maintain recordkeeping for equipment
ALVARADO CABRERA	193573	NC	E52643	12/3/2020	12/3/2020	203 (A), 203 (B)	Apply for a permit to operate and maintain filters in spray booth
AMFOAM INC	139252	NC	E48492	11/22/2019	11/22/2019	42303	Provide material amount processed in permitted desinator machine. Provide MSDS for glue used at facility
AMIN'S OIL INC	139323	NC	E45352	11/27/2018	11/27/2018	461	Install new vapor (orange) cap at 87 UST - handle broken; clean out liquid from all spill buckets - 87 & 91; Install AQMD/Nozzle Operation signage at all dispensers; Provide missing 2018 Periodic Compliance Inspection record; Provide current
AMIN'S OIL INC	139323	NOV	P72098	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 3888
AMKO FIXTURES & SEATING CO	120636	NC	E32920	9/21/2018	9/21/2018	42303	Provide records of VOC and SDS from coatings used on spray booth
AMKO FIXTURES & SEATING CO	120636	NOV	P65275	5/3/2019	9/21/2018	109, 1136	failure to keep VOC recordkeeping for active coating operations; applying a clear top coat on a wood product that has a VOC content in excess of the applicable limit of 275 grams per liter.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
ANSELMO MEZA VILLA	193570	NC	E52642	12/3/2020	12/3/2020	203 (A), 203 (B)	Apply for a permit to operate and maintain filters in spray booth
APRO LLC DBA UNITED OIL #124	177906	NOV	P72724	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 5565
APRO LLC DBA UNITED OIL #133	177917	NOV	P72733	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 5473
APRO LLC DBA UNITED OIL #133	177917	NC	E48586	6/14/2019	6/14/2019	461	Remove liquid from spill bucket of 87 UST/tank #1 _ on the vapor side. Replace torn boot at FP #10. Correct/repair alignment of nozzles at FP #12 & 17. Provide correct PVV test (TP 201.1E) with correct manufacturer.
APRO LLC DBA UNITED OIL #150	177956	NOV	P72752	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 5282
APRO LLC DBA UNITIED OIL #101	177857	NOV	P72707	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 5732
APRO LLC DBA UNITIED OIL #101	177857	NC	E47245	4/30/2019	4/30/2019	41960	Repair rotated spout and faceplate at Fueling Point # 6
ASBURY ENVIRONMENTAL SERVICES INC	109708	NOV	P71619	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							Certified Mail Tracking #7017 3380 0000 7803 3392
ASBURY ENVIRONMENTAL SERVICES INC	109708	NOV	P76753	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2837 1677
ATLAS IRON & METAL CO	147624	NC	E42886	3/7/2018	3/7/2018	PERP 2456, PERP 2457, TITLE13ARTICLE5S	2453(f) registration certificate including operating conditions shall be kept onsite, 2456(g) Provide engine hour meter reading, 2458(a) provide and maintain records, and 2454(c)(1) demonstrate proper PERP usage in accordance with registration conditions
AUTO-TECH BODY SHOP	152099	NC	E44743	7/11/2018	7/11/2018	109, 301	R109 keep VOC usage records with the date, material used, amount used, and VOC; R301 Either pay expired fees for identical PSB replacement to keep permit F93351 active or removed equipment with expired permit will become INA_NR
AUTO-TECH BODY SHOP	152099	NOV	P69584	11/19/2019	11/19/2019	203(A)	operating a paint spray booth without a valid permit to operate.
AVALON ARCO & SN MART	165878	NOV	P64930	2/28/2018	2/28/2018	201	Construction/Alteration/Replacement of gasoline dispensing equipment without first obtaining an AQMD Permit to Construct
AVALON ARCO & SN MART	165878	NOV	P72472	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 5783

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
AVALON ARCO & SN MART	165878	NC	E47254	5/15/2019	5/15/2019	461	Provide missing 2019 Periodic Compliance Inspection record; provide missing gasoline throughput totals from December 2018 to April 2019; April 2019 Vapor Recovery test not conducted - conduct test within 14 days and remain on April / October schedule
AVALON ARCO & SN MART	165878	NOV	P68434	5/15/2019	3/2/2019	461	Failure to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1st following each calendar year: 2018 data due 03/01/2019
AVALON PREMIUM TANK CLEANING	108730	NOV	P65060	4/26/2018	4/24/2018	402	The operation of Avalon Premium Tank Cleaning in a manner that discharged air contaminants which generated a public nuisance by causing detriment, nuisance, and annoyance to the public.
AVALON PREMIUM TANK CLEANING	108730	NC	E43609	4/27/2018	4/27/2018	42303	PROVIDE THE FOLLOWING RECORDS: PER PERMIT #G49313: 1) SELF MONITORING RECORDS FOR THE PAST 12 MONTHS; 2) BILL OF LADEN PER TRUCK DANA 7663; 3) PROOF OF REGISTRATION FOR PARKER BOILER AND PRESSURE WASHER (NOTHSTAR); 4) DAILY TRUCK LOGS FOR THE PAST 12 MOS.
AVNEX SURFACE FINISHING INC.	189752	NC	E46043	5/3/2019	5/3/2019	203, 222	R222_ Register the Parker boiler rated at 1,140,000 Btu/hr. R203(A)_ Obtain all PC/PO's that accurately reflect the tanks on site R203(B)_ Record daily the Amp Hour reading from the non_resettable meter on

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							days of operation (P/O G56903 Condition #5)
BARKEN'S HARDCHROME, INC	121215	NOV	P69802	3/27/2019	3/12/2019	1469	Hard chrome Plating Tank No. 2 was observed being air sparged without any parts being electroplated at the time of inspection.
BARKEN'S HARDCHROME, INC	121215	NOV	P69814	3/26/2020	10/31/2019	201, 203 (B), 1469	(1) Source test was not conducted within 60 days of conducting an emissions screening test that exceeded an emissions limit specified in the SCAQMD Permit to Operate. (2) Alteration of the APC system without first obtaining written authorization from the
BARKEN'S HARDCHROME, INC	121215	NOV	P69827	6/4/2021	10/19/2020	1469	FAILURE TO COMPLETE A SCAQMD APPROVED TRAINING PROGRAM EVERY TWO YEARS.
BLACK TUX, INC.	180260	NC	E44890	1/18/2019	1/18/2019	42303	Provide solvent purchase records, hazardous waste manifests, repair log, daily wet cloth inspection records, monthly leak inspection records, daily load poundage records, annual mileage report, (All for 2018)
BOWERS & SONS CLEANERS, VIVIAN BOWERS DB	124815	NC	E51887	6/18/2020	6/18/2020	206, 1102	Post permit on/near machine. Maintain all paperwork that is needed.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
BOWMAN FIELD, INC , CHROME NICKEL PLATIN	118602	NC	E45280	2/12/2019	2/12/2019	1469	1) Update OCS&ER to reflect new requirements (buildings enclosure, tank tier designation) 2) Update housekeeping log to reflect maintenance of buffing and grinding area 3) Maintain waste area in an enclosed building that does not lead to fugitive dust a
BOWMAN FIELD, INC , CHROME NICKEL PLATIN	118602	NOV	P64583	3/27/2019	2/2/2018	203 (B)	1) Failure to operate process tanks #16, 17 & 18 within the permitted maximum annual ampere-hour limit for calendar year 2018.
BOWMAN FIELD, INC , CHROME NICKL PLATING	118602	NC	E45274	8/30/2019	8/28/2019	1469	1) Shutdown Hex chrome tank until an acceptable measurement is measured at each collection slot.
BOWMAN FIELD, INC , CHROME NICKL PLATING	118602	NOV	P64589	3/20/2020	2/2/2020	1469	1) Failed to Submit OCS&ER by February 1, 2020; 2) Failed to clean or contain any liquid that may contain Cr6+ within one hour after being spilled.
BOWMAN FIELD, INC , CHROME NICKL PLATING	118602	NOV	P64597	1/19/2021	5/1/2020	1469	Failure to provide evidence that demonstrates initial source was submitted by 4/30/2020.
BOWMAN PLATING CO INC	18989	NOV	P66016	11/14/2018	10/18/2018	201, 203	OPERATING AIR POLLUTION CONTROL EQUIPMENT WITHOUT A VALID PERMIT TO OPERATE. OPERATING EQUIPMENT CONTRARY TO PERMIT TO CONSTRUCT CONDITIONS (A/N #580673). ALTERED AIR POLLUTION CONTROL EQUIPMENT WITHOUT FIRST OBTAINING A PERMIT TO CONSTRUCT.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
BOWMAN PLATING CO INC	18989	NC	E27787	11/16/2018	11/1/2018	42303	SHOW PROOF OF CLEAN UP ACTIVITIES IN PAINT SPRAY BOOTH AREA OF CHROMIUM PAINTS OVERSPRAY AND DEBRIS FROM PAINT OPERATIONS.
BOWMAN PLATING CO INC	18989	NC	E43694	9/19/2019	9/13/2019	203 (B), 1469	Relabel Tanks 301, 314, 321 with max conc. of Cr+6 in PPM. Label Tanks 166, 166A, 166B and 147 per R.1469(g)(3). Remove weather cap from exhaust stack to APCD (P/0 G46953) per permit condition #4. Repair differential pressure gauge for Stage 1 Mesh Pad.
BOWMAN PLATING CO INC	18989	NC	E49912	12/27/2019	12/27/2019	1469	ENSURE ALL BUILDING ENCLOSURE OPENINGS ON OPPOSITE ENDS ARE NOT SIMULTANEOUSLY OPEN BY USING ONE OR MORE APPROVED METHODS. CLOSE ALL BUILDING ENCLOSURE OPENINGS THAT DIRECTLY FACE AND OPEN TOWARDS SENSITIVE RECEPTORS OR USE ONE OR MORE APPROVED METHODS IN SUBPARAGRAPHS (d)(1)(A) through (d)(1)(E).
BOWMAN PLATING CO INC	18989	NOV	P69810	12/27/2019	12/5/2019	203 (B), 1469	Failure to contain solid & liquid material that contain Cr+6 that is spilled no later than one hour after spilled. Failure to comply with applicable sections of R.1469(f)(3). Failure to maintain the Chevron Mist Eliminator in good operating condition at

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
BOWMAN PLATING CO INC	18989	NC	E49913	1/15/2020	1/15/2020	201, 203 (B), 1469	Maintain pressure diff across ULPA filters below 3.0in WC (G54929); Submit app describing PSB equipped with ULPA filters as appropriate (G19828); Install and maintain gauge indicating pressure diff across ULPA filters (G55997); Maintain clear labeling on
BOWMAN PLATING CO INC	18989	NC	E49917	8/28/2020	8/28/2020	42303	Provide documentation demonstrating an asbestos survey was performed by a Certified Asbestos Consultant prior to roof cutting activities; Provide documentation demonstrating notification to 800_CUT_SMOG at least 48 hours prior to commencement of
BOWMAN PLATING CO INC	18989	NOV	P69819	9/11/2020	7/3/2020	203 (B), 1403, 40 CFR	Failure to thoroughly survey for the presence of asbestos prior to any renovation activity, specifically cutting the roof in the passivation area without prior asbestos survey;
BOWMAN PLATING CO INC	18989	NOV	P69822	11/17/2020	11/12/2020	203(B)	DISCHARGING THE EXHAUST STACK WITH A WEATHERCAP.
BOWMAN PLATING CO INC	18989	NC	E49920	3/26/2021	2/2/2021	1469	PER THE RULE, ONGOING COMPLIANCE STATUS AND EMISSIONS REPORTS SHALL BE SUBMITTED TO THE EXEC. OFFICER EACH CALENDAR YR ON OR BEFORE FEBRUARY 1ST FOR ALL SOURCES AND SHALL INCLUDE INFORMATION COVERING THE PRECEDING CALENDAR YR (JAN 1ST _ DEC 31ST)

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BREITBURN OPERATING L.P.	150209	NC	E52040	4/21/2020	5/1/2018	1173	R1173(i)(1): Provide documentation of R1173 1Q2018 Quarterly Report; records are quarterly inspection reports sent to the Executive Officer no later than 30 days after the end of each calendar quarter. For reviewing 1Q2018 R1173 Notification.
BRIDGE POINT GARDENA LAND I LLC	191949	NOV	P67945	9/11/2020	9/10/2020	402, 41700	Discharge of air contaminants ... which cause detriment, nuisance or annoyance to any considerable amount of persons or to the public
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	NOV	P72129	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 4175
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	NC	E47246	4/30/2019	4/30/2019	461	Remove liquid and debris from all 3 gasoline tank spill buckets; South Coast AQMD Complaint # 800-242-4020 is missing from signage at all dispensers
BROADWAY CENTURY SHELL/HARRY HAHN DBA	141501	NC	E48776	8/1/2019	8/1/2019	203	Submit Permit Application for Alteration to correct the ISD Manufacturer from INCON to Veeder-Root (Version 1.05) on the Permit to Operate
BROADWAY MART, INC	180406	NC	E48765	6/7/2019	6/7/2019	461	Provide access to AQMD Operation & Maintenance manual / records - including maintenance records test records, ISD Alarm/Repair logs, and gasoline throughput records
BUYRITE	103751	NC	E47252	5/9/2019	5/9/2019	461	Install missing AQMD/Nozzle Operation signage at all dispensers; provide current (2019) Daily & Weekly maintenance inspection records

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
C & R PLATING, INC.	171832	NC	E43641	12/14/2018	12/14/2018	40701(G)	- Provide evidence and copies of chemical concentrations in percent by weight, operation records, exceedance records, amp_hr records, process description, heating setpoint(s) for all South Coast AQMD permitted lines for past 2 years. - P/O G10613(Scrubber) Smoke test photographic evidence Maintenance records for mist eliminator and monitoring equipment Any and all flow meter, pressure differential, pH records - Initial Compliance Report (submitted by Feb 1, 2004), Compliance Report (submitted by Feb 1, 2005), Housekeeping Records for wastes
C & R PLATING, INC.	171832	NC	E47284	6/12/2019	6/7/2019	203 (A)	Do not operate "Spray Booth #2" without first obtaining a valid Permit to Construct/Permit to Operate.
C & R PLATING, INC.	171832	NC	E48738	8/13/2019	8/13/2019	219, 1469	R1469 (g)(3) - All tanks labeled with ID#, bath contents, concentration, temperature, agitation and tier # for P/O G47162 R1469 (d)(1) - Per P/O G47162, each rectified tank equipped with continuous recording, non-resettable amp hr. meter R1469 - submit building compliance plan to South Coast AQMD Rule 219 - Provide manufacture plate/ bill of sale for Parker Boiler T1140 to determine compliance

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
C & R PLATING, INC.	171832	NOV	P73502	4/8/2021	2/2/2021	1469	Failure to submit Ongoing Compliance Status and Emission Report (OCSER) on or before February 1.
C J AUTO CENTER BODY & PAINT AUTO REPAIR	182615	NC	E49726	2/4/2020	2/4/2020	203 (A), 1151, 1171	remove non-compliant coatings (PCL Polyprimer). Apply for a p/o prep station. Remove non-compliant solvent including : grow automotive 1705 & super klean.
C J AUTO CENTER BODY & PAINT AUTO REPAIR	182615	NC	E49727	2/4/2020	2/4/2020	109, 42303	Provide coating & solvent usage log showing VOC emission for the past 12 months. Provide SDS's with VOC content of spray gun cleaner (instafinish). Provide SDS with VOC content of clear coat : instafinish
C L AUTO BODY SHOP	136685	NC	E53241	3/24/2021	3/24/2021	109, 203 (B), 206	Maintain permit to operate on equipment/within 8 meters, maintain manometer in good condition, remove old filter and replace with new filters, present and maintain VOC emission records.
CAL METAL PROCESSING CO	23410	NC	E50849	3/19/2020	2/25/2020	42303	Provide evidence and copies of information related to all tanks on site: Tank #, Chemical Name, Product SDS, Chemical Concentration, Hex Chrome PPM, Heated, Rectified, Sparged, Phosphoric/Sulfuric Anodizing Rectifier Info
CAL METAL PROCESSING CO	23410	NC	E50854	4/21/2020	2/25/2020	203 (A), 203 (B)	Submit permit application for all process tanks requiring a permit to operate. If any of the tanks that are exempt are part of a line that requires a permit, they should be included in the permit. All tanks shall be clearly identified and labeled.
CARDLOCK FUELS SYSTEM INC	115258	NOV	P71956	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 3380 0000 7803 8632

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
CARDLOCK FUELS SYSTEM INC	115258	NC	E49863	10/17/2019	10/17/2019	461	Contact ICC/Veeder Root Technician to address reoccurring ISD Gross Pressure Warnings and document on ISD Alarm/Repair Log
CARDLOCK FUELS SYSTEM INC	115258	NOV	P76768	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2837 1738
CARLOS CLEANERS	168277	NC	E48176	6/3/2019	6/3/2019	42303	Provide records for gasket/cooling coil service, ATCM certificate, current laundry poundage, PERC additions, and leak inspections.
CARSON - WILMINGTON, INC	156145	NOV	P72353	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 6344
CARSON - WILMINGTON, INC	156145	NC	E47242	4/19/2019	4/19/2019	461	Address & Repair reoccurring 'Readiness ISD' event at Veeder-Root - ISD Daily Details shows no data at FP3 and 4, also issue at FP2 and 7 with collections; Provide updated 2019 ISD Alarm and Repair Log
CASTLE CLEANERS, RICARDO RUIZ, DBA	121117	NC	E46855	4/29/2019	4/29/2019	42303	Provide daily inspection, solvent purchase and addition, and gasket replacement and cooling coil cleaning records.
CASTLE CLEANERS, RICARDO RUIZ, DBA	121117	NOV	P69508	4/29/2019	10/1/2017	1421	Failure to renew ATCM certificate before the expiration date.
CASTLE CLEANERS, RICARDO RUIZ, DBA	121117	NOV	P69514	5/21/2019	8/25/2018	203 (B)	Operating equipment contrary to permit conditions
CEMAK TRUCKING	86436	NC	E53251	5/18/2021	5/18/2021	203 (B)	Maintain VOC emission records

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	55343	NOV	P66303	1/4/2018	12/29/2017	403	allowing a street sweeper to operate in a manner that caused emissions of fugitive dust to cross the southern and western property line.
CENTURY AND MAIN, INC.	147989	NOV	P66020	5/29/2019	4/2/2019	461	Missing test records; PV vent test (TP201.1E)
CHOI'S AUTOBODY & REPAIR	189473	NC	E48286	5/28/2019	4/9/2019	203	apply for a permit modification to reflect the actual number of spray booth exhaust filters. 28 instead of 22.
CHUNG'S ARCO YONG RAE CHUNG	174330	NOV	P77091	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 0190 0000 6375 9137
CIRCLE K STORES INC. HAYEL HAWATMEH #221	174910	NC	E46443	1/25/2019	1/25/2019	203, 461	Submit AQMD Form 400-CO for Change of Operator for new permit under new business; Replace (1) vapor drybreak cap and (1) vapor fill cap - both are missing gaskets; Correct 'Clean Air Nozzle' signage phone #s from 800-952-5588 to correct phone #
CITY OF LOS ANGELES - SO LA ANIMAL CARE	166318	NOV	P69591	2/25/2020	2/25/2014	203(A)	operating a diesel engine over 50 HP without a valid permit to operate
CLARK REALTY	193458	NC	F11177	11/18/2020	11/17/2020	1403, 42303	Please provide evidence and copies of prior asbestos survey, asbestos removal notification(s) to the South Coast AQMD, CSLB/DOSH licenses, contract(s), names, addresses, phone numbers of worker(s) and supervisor(s), AHERA training certificates for workers

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
CLARK REALTY	193458	NC	G11179	11/18/2020	11/17/2020	1403	Please secure and stabilize the bathroom and shower area of unit #6, have a CAC conduct a contamination assessment of the aforementioned areas, and prepare a Procedure 5 cleanup plan.
CM LAUNDRY, LLC	153702	NC	E36429	6/6/2018	6/6/2018	42303	1) Provide Rule 1155 Weekly logs (baghouse), 2) Provide daily potassium usage logs, 3) Provide BTU rating for Sussman oven, and 4) Provide monthly abrasive garnet usage
COMILLA CORP	139763	NOV	P70230	8/18/2020	3/1/2020	461	Failure to conduct reverification tests semiannually (missed test in February 2020)
COMPETENCY COLLISION	174853	NC	E42899	6/6/2018	6/6/2018	109, 206, 1151	R109 Keep VOC usage records, R206 Post Permit G26399 within 8 meters of permitted equipment, R1151 Use compliant coatings and remove all Grow Automotive Products numbered: 1370, 1380, and 1501.
COMPTON CITY, CITY HALL	22284	NC	E41400	8/14/2018	8/14/2018	2202	SUBMIT EMISSION REDUCTION STRATEGY WITH OPTION CHOSEN ALONG WITH ALL FILING FEES AND APPLICABLE LATE FESS. 2017 (OVERDUE) 2018 (OVERDUE)
COMPTON CITY, FIRE DEPT STA #1	12892	NC	E36427	2/27/2018	2/27/2018	42303	Provide AQMD permit for Onan L635 engine running emergency generator or provide proof that engine is less than 50 horsepower. If neither, apply for AQMD permit to operate (located at 201 S. Acacia Ave, Compton)
COOPER & BRAIN, BANK LEASE	39035	NOV	P69270	1/31/2020	1/28/2020	203, 463, 1173	Failure to maintain fixed roof Tank #6087 in good operating condition, Failure to maintain fixed roof tank #6087 in vapor tight conditions, and leak greater than 50,000ppm from the test separator valve.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
COOPER & BRAIN, BANK LEASE	39035	NOV	P69272	2/20/2020	2/20/2020	203, 463	Failure to maintain fixed roof tank #6087 & wash tank #1 in good operating condition. Failure to maintain fixed roof tank #6087 & wash tank #1 in vapor tight conditions.
COSMETICS AUTO BODY	188016	NC	E44739	7/6/2018	7/6/2018	109, 203 (A), 1151, 1171	R203a Apply for a permit for onsite PSB with previous P/N G31987, R1151 Remove all non-compliant coatings such as the HET Grow Automotive 1380, R109 keep VOC records, R1171 Do not use HET Grow Automotive for cleaning operations
COSMETICS AUTO BODY	188016	NOV	P68064	12/27/2018	12/27/2018	109, 203 (A), 1171(C)(1)	R203(a) Operation of PSB without a valid AQMD permit, R109 Failure to keep and provide records of VOC usage for onsite coating operations, R1171(C)(1) Usage of general solvent cleaners exceeding the limit of 25 g/L.
COSMETICS AUTO BODY	188016	NOV	P73814	6/24/2021	6/24/2021	109, 203 (A), 1151(D)(1)	1) Operation of a paint spray booth without a valid AQMD permit. 2) Failure to keep and provide records of VOC usage for onsite coating operations. 3) Usage of reducer that produces base coats exceeding 3.5 lb./gal limit.
COTTON CLUB DRY CLEANERS	149344	NC	E46860	5/13/2019	5/13/2019	42303	Provide daily inspection, poundage, weekly leak, solvent addition, and cooling coil/gasket replacement records.
COURTESY CLEANERS, M YADEGAR, DBA	121602	NC	E46853	4/29/2019	4/29/2019	42303	Provide daily inspection, weekly leak, solvent addition and purchase, repair, daily poundage, and gasket and cooling service records, as well as ACTM certificate.
COURTESY CLEANERS, M YADEGAR, DBA	121602	NOV	P69515	5/24/2019	8/31/2018	1146.2	Operating boiler without demonstrating compliance with emission limits.
CRENSHAW AUTO GROUP	193503	NC	E52719	12/1/2020	12/1/2020	109, 1171(C)(1)	Remove noncompliant cleaning solvent from facility and only use compliant solvent (25 g/l); Maintain VOC recordkeeping

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
CRENSHAW AUTO GROUP	193503	NOV	P73808	12/1/2020	12/1/2020	1151(E)(1)	Possessing associated noncompliant reducers, primer, and clearcoat.
CRENSHAW ENERGY & RETAIL, LLC	167315	NOV	P72490	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 6018
CRENSHAW LAX TRANSIT CORRIDOR	178462	NC	E48304	7/9/2019	7/3/2019	42303	Provide a copy of operation log showing date, start/stop hours, and reason for each use. Provide a copy of valid ARB registration or AQMD permit and post on equipment.
CRENSHAW LAX TRANSIT CORRIDOR	178462	NOV	P69567	7/9/2019	6/3/2019	203 (A)	Operating a Diesel engine over 50 horsepower without a valid permit to operate.
CRENSHAW MEDICAL GROUP, LP	137927	NC	E49759	6/19/2020	6/19/2020	1415	submit 1415 registration
CRENSHAW SHELL MINI MART	168130	NOV	P72501	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7016 0750 0000 5020 7723
CUSTOM FURNITURE & CABINETS, INC.	180135	NC	E49762	6/23/2020	6/23/2020	42303	provide a spray log of VOC coating used for 2018, 2019, & 2020.
D & E ELLA, INC.	191180	NC	E46084	10/31/2019	10/30/2019	42303	H&SC 42303: Provide VOC content information for screen printing inks used at facility
DAE EUN INC	106729	NC	E47163	3/1/2019	3/1/2019	109, 203 (B), 1171	R109 keep and provide recordkeeping for all VOC usage, R203(b) Install a manometer to Prep station and replace Prep Station Filters. Fill PSB manometer, R1171 Remove non-compliant cleaning solvent: HET Grow Automotive 1705

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DAVID'S SERVICE STATION, NAM CHUNG DBA	121298	NOV	P71997	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 3380 0000 7803 9042
DAVID'S SERVICE STATION, NAM CHUNG DBA	121298	NC	E49875	12/13/2019	12/13/2019	461	Replace partial torn faceplate at Nozzle # 1; Provide missing gasoline throughput totals from January 2019 to November 2019
DDS COLLISION, INC.	175449	NC	E42877	2/2/2018	2/2/2018	203 (B), 1151, 1171	203b install manometer, 1171 remove HET 1370, 1151 keep records in accordance with r109
DDS COLLISION, INC.	175449	NC	E46881	5/1/2019	5/1/2019	1151, 1171, 203 (B)	Begin maintaining a record of all VOC containing coatings and solvents used. Remove non-compliant coatings and solvents. Calibrate manometer on spray booth
DEBBIE'S IMPERIAL CLEANERS #2	9401	NC	E48451	5/13/2019	5/13/2019	42303	Provide daily inspection, poundage, weekly leak, solvent purchase and addition, cooling coil cleaning and gasket replacement records. Provide ATCM Certificate.
DEBORAH & TWINS INC	136641	NC	E47241	4/18/2019	4/18/2019	461	Replace orange drybreak vapor cap at South UST - handle is broken/pin missing; install new top shear pin at # 7 breakaway/nozzle; provide 2019 /current Daily, Healy Weekly and Healy Quarterly inspection records and maintain
DELUXE FURNITURE DESIGN CORP	176718	NC	E32930	3/14/2019	3/14/2019	109, 203	Calibrate manometer on spray booths. Ensure all filter replacements are at least 2 inches thick. Ensure all required information on usage records is available in a District approved format. Submit a

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							change of ownership application to the District.
DEMENNO_KERDOON DBA WORLD OIL RECYCLING	800037	NOV	P64424	10/16/2018	7/1/2017	2004	Quarterly Certification of Emission Reports for quarters 1, 2, and 3 of the 2017 compliance year were inaccurate
DESIGNED METAL CONNECTIONS	144198	NC	E41405	8/3/2018	8/3/2018	2202	R2202 _ Submit an annual plan.
DESTINY CHEVRON	164590	NC	E45335	9/18/2018	9/18/2018	461, 41960	Repair loose spout at Nozzle # 8; FP # 5 Breakaway - install top shear pin (broken); Replace damaged faceplate at FP # 4; Provide 2018 Periodic Compliance Inspection record (missing); Provide 2018 Repair/ISD logs for all repairs, alarms, installations, etc.
DESTINY CHEVRON	164590	NOV	P68401	9/18/2018	9/18/2018	203	Permit states ISD Incon Software Version 1.3.0; Version 1.2.0 is currently installed
DESTINY CHEVRON	164590	NOV	P72451	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 5578
DON KELLER COLLISION CENTER	164513	NC	E51894	7/23/2020	7/23/2020	203	Apply for a permit to operate on existing spray booth.
DONGHAO LI	191728	NOV	P69460	2/5/2020	9/24/2019	1403	Failure to conduct an asbestos survey. Failure to notify SCAQMD prior to renovation/demo activity. Failure to remove ACM prior to demo activity. Failure to place ACWM in labelled

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							leak tight containers. Failure to use ACM removal procedures.
DONGHAO LI	191728	NC	F10853	4/24/2020	4/17/2020	42303	Please provide evidence and copies of the prior asbestos survey, any asbestos removal and demolition notifications, contracts, and specify which asbestos removal procedure was used.
DONGHAO LI	191728	NC	F10854	4/24/2020	4/17/2020	42303	Please provide evidence and copies of the prior asbestos survey, any asbestos removal and demolition notifications, contracts, and specify which asbestos removal procedure was used.
DONGHAO LI	191728	NC	F10855	4/24/2020	4/17/2020	42303	Please provide evidence and copies of the prior asbestos survey, any asbestos removal and demolition notifications, contracts, and specify which asbestos removal procedure was used.
DONGHAO LI	191728	NC	F10856	4/24/2020	4/17/2020	42303	Please provide evidence and copies of the prior asbestos survey, any asbestos removal and demolition notifications, contracts, and specify which asbestos removal procedure was used.
DONGHAO LI	191728	NOV	P70290	5/15/2020	4/17/2020	403, 1403	Failure to perform an asbestos survey prior to a demolition, failure to notify the South Coast AQMD of the intent to conduct a demolition activity, allowing trackout to extend more than 25 feet in cumulative length.

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DONGHAO LI	191728	NOV	P70292	5/19/2020	4/17/2020	1403	Failure to perform an asbestos survey prior to a demolition, failure to notify the South Coast AQMD of the intent to conduct a demolition activity.
DONGHAO LI	191728	NOV	P70294	5/19/2020	4/17/2020	1403	Failure to perform an asbestos survey prior to a demolition, failure to notify the South Coast AQMD of the intent to conduct a demolition activity.
DONGHAO LI	191728	NOV	P70296	5/19/2020	4/17/2020	1403	Failure to perform an asbestos survey prior to a demolition, failure to notify the South Coast AQMD of the intent to conduct a demolition activity.
DONGHAO LI	191728	NC	F11070	9/3/2021	9/2/2021	1403, 42303, 40701(G)	Please provide evidence and copies of a prior asbestos survey, asbestos removal notifications, CSLB/DOSH licenses, AHERA training certificates, supervisor logs, hazardous waste manifests, hazardous waste generator labels, identify the location where
DONGHAO LI	191728	NC	F11072	9/3/2021	9/2/2021	40701(G), 42303	Please provide evidence and copies of a prior asbestos survey, asbestos removal notifications, CSLB/DOSH licenses, AHERA training certificates, supervisor logs, hazardous waste manifests, hazardous waste generator labels, identify the location where
DONGHAO LI	191728	NC	G11190	9/3/2021	9/2/2021	1403	Please secure and stabilize the entire site, have a CAC conduct a contamination assessment of the entire site, prepare a Procedure 5 cleanup plan, and within 90 days, attend a Rule 1403 Compliance Promotion Class at the South Coast AQMD

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DONGHAO LI	191728	NC	G11191	9/3/2021	9/2/2021	1403	Please secure and stabilize the entire site, have a CAC conduct a contamination assessment of the entire site, prepare a Procedure 5 cleanup plan, and within 90 days, attend a Rule 1403 Compliance Promotion Class at the South Coast AQMD
DPSS _ EXPOSITION PARK WEST ASSET LEASIN	126835	NC	E53235	3/3/2021	3/3/2021	206, 1146.1, 1415	Post permit to operate, provide gas records, provide tune up records, and register HVAC systems.
DPSS _ EXPOSITION PARK WEST ASSET LEASIN	126835	NOV	P73869	3/30/2021	3/30/2021	203 (B), 1146.1, 1415	Failure to provide proof of portable analyzer test, violation of permit to operate condition no. 3, failure to submit registration plans for operating air condition systems.
DPSS _ EXPOSITION PARK WEST ASSET LEASIN	126835	NC	E53252	5/19/2021	5/19/2021	222	Register boilers
DUKE REALTY LIMITED PARTNERSHIP	189980	NC	E50837	1/10/2020	1/8/2020	1403	Secure and stabilize demolished concrete area. Conduct contamination assessment of demolished concrete area. For verified asbestos contamination, have CAC submit Procedure 5 cleanup plan for SCAQMD approval.
DUTKO HARDWOOD FLOORS INC	151292	NC	E51803	2/23/2021	2/23/2021	203 (B)	Begin maintaining a monthly log summary of VOC emissions
DUTKO HARDWOOD FLOORS INC	151292	NC	E51804	2/23/2021	2/23/2021	42303	1) provide SDS's for coatings, solvents, and adhesives.2) coatings purchase receipts, and 3) gas bill.
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	NC	E50612	12/18/2019	12/18/2019	1173(G)(1)	Repair leak (16,000 ppm) within three calendar days

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E&B NATURAL RESOURCES MANAGEMENT CORP	191119	NOV	P66850	12/18/2019	12/18/2019	203 (B), 1148.1, 1173	Two leaks greater than 50,000 ppm detected during district inspection; allowing produced gas to be vented to the atmosphere; failure to comply with Rule 1173 and 1148.1 (P/O G59305, Condition 4)
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	NC	E46501	1/2/2020	1/2/2020	222	Submit Rule 222 registration
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	NC	E51096	6/9/2021	6/4/2021	1148.1	Conduct a specific cause analysis for the 6/4/2021 confirmed odor event and submit the specific cause analysis report as required by rule 1148.1(f).
E&B NATURAL RESOURCES MANAGEMENT CORP	191119	NOV	P73327	11/19/2021	11/19/2021	1173	Vapor leak greater than 50,000 ppm from a drain in light liquid / gas / vapor service.
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E26437	1/17/2018	1/17/2018	42303	PROVIDE PAINT USAGE RECORDKEEPING FOR THE WEEKS OF DECEMBER 4_18 2017 AND JANUARY 8_12, 2018.
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NOV	P66008	2/16/2018	1/25/2018	1469.1	NOT CONDUCTING SPRAYING AND CLEAN UP OPERATIONS IN A MANNER THAT MINIMIZES FUGITIVE EMISSIONS OF OTOMIZED PAINT PARTICLES.
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E33851	4/6/2018	3/29/2018	203, 3002	SUBMIT CORRECTED FORM 500_ACC, SECTION II (ANNUAL COMPLIANCE CERTIFICATION REPORT) WITH ATTACHMENT (FORM 500_C2). PROVIDE QUARTERLY INSPECTION RECORDS.
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E26439	8/3/2018	8/3/2018	42303	SHOW PROOF OF REPAIR OF SCRUBBER FLOW METER. PROVIDE PAINT SPRAY BOOTH VOC RECORDS FACILITY_WIDE, DAILY FROM 7/16/18_7/27/18. PROVIDE OVEN 9 & 12 VOC RECORDS.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E33853	8/7/2018	8/3/2018	3002(C)(1)	SUBMIT SIGNED, CORRECTED FORM 500_ACC, SECTION II (ANNUAL COMPLIANCE CERTIFICATION REPORT). SUBMIT SIGNED CORRECTED FORM 500_ACC TO USEPA (ADDRESS LISTED ON PAGE TWO (2) OF FORM 500_ACC).
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E27785	10/17/2018	10/17/2018	42303	PROVIDE PAINT RECORDS & HAZARDOUS WASTE MANIFEST FOR OCTOBER 11, 2018.
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E46769	6/27/2019	6/18/2019	42303	Provide last 3 months of VOC records for paint booths and record of the last chromic acid flake additions to process tanks. Provide evidence of the installation of a differential pressure gauge on point booth P/O D3361 (#8).
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NC	E46776	9/5/2019	9/5/2019	3002(C)(2)	1) Responsible Official Signature Statement on the Title V Semi-Annual Monitoring Reports and Report for Annual Compliance Certification must match the designated Responsible Official on the Title V permit. 2) Revise the 2018 500-ACC to accurately reflect the compliance status of the facility. 3) Revise the 500-SAM for the period of 1/1/18 to 6/30/18 to reflect the deviations that occurred.
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	45938	NOV	P69817	6/16/2020	5/8/2020	203 (B), 1469	FAILURE TO NOTIFY AT LEAST 60 CALENDAR DAYS BEFORE THE SOURCE TEST IS SCHEDULED TO OCCUR; FAILURE TO MAINTAIN ALL DOCUMENTATION SUPPORTING THE NOTIFICATIONS AND REPORTS REQUIRED BY RULE 1469.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
EARLE M. JORGENSEN CO	124560	NC	E52586	11/19/2020	11/19/2020	109, 1155	Begin keeping weekly VEE records per R1155 and provided SDS for grinding lubricant
EBENEZER CLEANERS	146649	NC	E51889	7/8/2020	7/8/2020	1102	Need to maintain all paperwork/logs for the dry-cleaning machine and purchase receipts.
EDDIE CHAVEZ	193193	NC	F11056	10/8/2020	10/8/2020	40701(G)	Please provide evidence and copies of a prior asbestos survey, contracts, building and safety permits, and if no asbestos survey has been done, please have one conducted on the north and east side of the property, and any other disturbed area.
EDDIE CHAVEZ	193193	NOV	P67532	11/6/2020	9/2/2020	1403	Failure to have an asbestos survey performed prior to the start of renovation activity.
EDY'S AUTO REPAIRS & AUTOBODY	184177	NC	E48272	5/17/2019	5/17/2019	203 (A), 1151, 1171	apply for a permit to operate paint spray booth. Remove non-compliant reducer and solvent.
EKD FUEL CORP	158174	NOV	P72376	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 6566
EKD FUEL CORP	158174	NOV	P68440	6/11/2019	3/2/2018	461	Failure to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1st following each calendar year: 2017 data (due 03/01/18) and 2018 (due 03/01/19)
EL SHADDAI AUTO COLLISION CENTER	189990	NC	E46880	5/1/2019	5/1/2019	42303	Begin maintaining a record of all VOC containing coatings and solvents used
EL SUPER, BODEGA LATINA CORP.	164606	NOV	P73653	7/7/2020	1/5/2017	203(A)	operating a natural gas fired generator over 50hp without a valid permit to operate

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
ELECTROLIZING INC	7978	NC	E39822	3/13/2018	3/9/2018	203 (A)	SUBMIT AN APPLICATION FOR A PERMIT MODIFICATION FOR PERMIT NO. D72298 TO CORRECT THE EQUIPMENT DESCRIPTION. IN ADDITION PROVIDE THE SOLUTION BEING USED IN THE TANK ON THE APPLICATION.
ELMESIRY, INC SM OIL	170704	NOV	P72535	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 7439
ELMESIRY, INC SM OIL	170704	NOV	P68437	6/4/2019	11/1/2018	203, 461	Operating with an invalid permit; equipment does not match description - Permit says Phase II is VR-204, equipment installed is VR-202; Failure to conduct reverification tests semi-annually - missed test in October 2018; Failure to conduct reverification
ELTA PATIO AUTO CENTER & BODY SHOP	132448	NC	E48476	8/8/2019	8/8/2019	203	Fill manometer gauge, begin keeping usage records, provide last hazwaste record.
ESPOLON AUTO & BODY REPAIR	184243	NC	E46877	4/23/2019	4/23/2019	42303	Begin a paint usage log documenting all VOC sprayed beginning today
ESPOLON AUTO & BODY REPAIR	184243	NC	E46878	4/23/2019	4/23/2019	203(A), 206	Provide proof of a valid permit to operate. Post a copy of valid permit to operate
EVERGREEN RECYCLING, INC.	164018	NC	E32934	5/3/2019	5/3/2019	403(D)(2), 42303	provide to the District: copy of CARB PERP registration documents for the grinder with VIN ending in 1002013; monthly throughput records for trommel screen under PERP permit #176911 year to date; copy of reg. documents for VIN #202006.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
EVERGREEN RECYCLING, INC.	164018	NC	E32937	6/6/2019	6/6/2019	203 (A)	ensure that all portable equipment on premises and associated engines are either registered with CARB PERP or have an AQMD permit if they remain one site permanently or remain on site longer than permitted by CARB regulations.
EXPRESS SIGN & NEON	178198	NC	E49714	11/15/2019	11/15/2019	42303	begin keeping a recordkeeping log of all VOC solvents and coatings sprayed
EXPRESS SIGN & NEON	178198	NC	E49720	1/14/2020	1/14/2020	1107	remove and replace non-compliant coating : adhesion promoter Bull dog
EXPRESS WELDING & IRON WORKS	191745	NC	E49730	2/5/2020	2/5/2020	203(A)	apply for a permit to operate paint spray booth
FABRI_COTE,DIV A & S GLASS FABRICS CO IN	25501	NOV	P67117	10/24/2019	9/1/2019	3002	Failure to operate a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V permit at all times
FELIX RAMOS	192822	NC	F10732	4/8/2020	4/7/2020	40701(G)	Provide evidence and copies of: prior asbestos survey, asbestos removal and demolition notification(s), contract(s), building and safety permits, names of worker(s) and supervisor(s), supervisor logs, waste information, property owner/demo info.
FELIX RAMOS	192822	NOV	P74214	8/5/2020	4/7/2020	1403	Failure to conduct an asbestos survey and notify the District prior to demolition. Failure to have onsite supervisor trained on the provisions of Rule 1403.
FERDOS INC	185263	NOV	P77281	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 2280 0002 0330 5723

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
FLORENCE FOOD MART CORP	144403	NOV	P72177	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 5202
FLORENCE GAS MART INC	180526	NC	E45444	10/5/2018	10/5/2018	203, 461	Maintain ISD alarm log with all instances of alarms, repairs made, and alarm clears. Ensure spill bucket assemblies are installed properly and maintained free of liquid and debris. Replace torn boots on nozzles 1 and 6. Replace torn faceplate on nozzle 4
FLORENCE SHELL	149032	NOV	P72235	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 1448
FLORENCE SHELL	149032	NOV	P76928	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2837 0076
FMG PETROLEUM INC	179582	NC	E45355	12/11/2018	12/11/2018	461	Torn boot assembly at Balance nozzle # 4 - repair boot
FMG PETROLEUM INC	179582	NOV	P77166	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 2280 0002 0330 4559
G & M OIL CO, LLC #57	111357	NC	E48595	6/28/2019	6/28/2019	461(C)(2)(B)	Replace torn boot on FP #7. Repair sticky insertion interlock mechanism at FP #3.
G & S STATION, GEHAN KHAFAGY	176766	NC	E44715	6/20/2018	6/20/2018	461, 41960	Replace torn boot assembly at Nozzle #s 2 and 4; Provide Periodic Compliance Inspection record for 2018; Provide 2018

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							Daily and Weekly Interlock inspection records
G & S STATION, GEHAN KHAFAGY	176766	NOV	P64939	6/20/2018	11/23/2017	203, 461	Equipment does not match description (one 12k gallon UST is installed; permit says 10k gallon UST); Test manually clearing ISD Alarms with no records of technician performing tests/assessments or repairs; Failure to conduct reverification tests annually
G & S STATION, GEHAN KHAFAGY	176766	NOV	P64948	8/15/2018	6/28/2018	203, 461	Equipment does not match description (one 12k gallon UST is installed; permit says 10k gallon UST); Continued test manually clearing ISD Alarms with no records of technician performing tests/assessments or repairs; no documentation in ISD Alarm/Repair log
G & S STATION, GEHAN KHAFAGY	176766	NOV	P77119	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 2280 0002 0330 4252
G&M OIL CO, LLC #111	131145	NOV	P67662	6/5/2018	5/31/2018	461	Failure to conduct vapor recovery performance tests within 10 days of initial operation of an altered gasoline dispensing facility
G&M OIL CO., #56	188707	NC	E46338	12/6/2018	12/6/2018	461, 42303	Provide records of 10-day Performance test after VR-202 to VR-204 conversion. Provide records of date of conversion from VR-202 to VR-204. Provide records of valid Methodology 6 dynamic backpressure test results.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
G&M OIL CO., #56	188707	NOV	P67688	1/10/2019	11/4/2018	461 (E) (1)	Failure to conduct Vapor Recovery Performance testing within 10 days of initial operation of an altered gasoline transfer and dispensing facility.
GALINDO CLEANERS	118665	NC	E46852	4/29/2019	4/29/2019	203 (A)	Obtain a permit to operate for the dry cleaner equipment.
GALINDO'S CLEANERS	126515	NC	E46854	4/29/2019	4/29/2019	42303	Provide daily inspection, leak, repair, and gasket replacement and cooling coiling cleaning records for the past year.
GARDENA SHELL, MOHAMMAD I KASKAS	165049	NC	E42306	1/9/2018	1/9/2018	461	Replace both product (gray) caps at USTs - missing/loose gasket
GARDENA SHELL, MOHAMMAD I KASKAS	165049	NOV	P72458	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 5646
GARNER ENGINEERING INC	144474	NC	E50628	2/23/2021	2/17/2021	1148.1	The operator of an oil & gas production facility shall post instructions for reporting odor complaints.
GAS 4 LESS, KARAM ABDALLA DBA	148171	NOV	P64943	7/26/2018	7/5/2018	201, 203	Construction/Alteration/Replacement of gasoline dispensing equipment without first obtaining an AQMD Permit to Construct. Operating without a valid Permit to Operate.
GAS 4 LESS, KARAM ABDALLA DBA	148171	NOV	P76918	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4295
GLOBAL AUTO ONE STOP BODY & PAINT	193341	NC	E53286	4/15/2021	4/15/2021	203 (A)	Submit all requested information, forms, and fees to continue with the permit application process.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
GLORIA HOMES COMMUNITIES	194346	NC	G11376	4/21/2021	4/21/2021	1403	Please secure and stabilize the areas impacted by the fire, have a CAC conduct a contamination assessment of the site, and prepare a Procedure 5 cleanup plan.
GLORIA HOMES COMMUNITIES	194346	NC	F11061	6/15/2021	6/15/2021	1403, 40701(G), 42303	Please provide evidence and copies of the contracts, building and safety permits, and the business license, as well as the name, title, phone number, and email address of the entity/individual who is the property owner of this address.
GNC CLEANERS	183782	NC	E48308	7/26/2019	7/26/2019	1102, 42303	begin keeping operational records including daily poundage, service & repair log, monthly inspection checklist, and annual report. Provide a copy of solvent purchase receipts for the last 12 months.
GOLD CLASS AUTO REPAIR	189992	NC	E46879	5/1/2019	5/1/2019	42303	Begin maintaining a record of all VOC containing coatings and solvents used
GOLD STAR GAS, YANEZ BROS INC.	150820	NOV	P72257	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 1660
GOLD STAR GAS, YANEZ BROS INC.	150820	NOV	P68438	6/7/2019	3/2/2018	461	Failure to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1st following each calendar year: 2017 data (due 03/01/18) and 2018 (due 03/01/19)
GOLDEN BODY AUTO SHOP	178479	NC	E32944	8/8/2019	8/8/2019	109, 203 (B)	fix manometer and fill with liquid; retain invoices and safety data sheets of all coatings and solvents; maintain accurate VOC records
GOLDEN STATE ENTERPRISES, LLC	176454	NC	E48768	6/25/2019	6/25/2019	461	Repair loose spout at Nozzle # 9

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
GOMEZ WELDING & MFG & IRON WORK,R GOMEZ	132331	NC	E49736	2/18/2020	2/18/2020	206, 42303	provide a copy of spray log showing VOC coating usage over the past 12 months. Post a copy of permit to operate.
GREEN DOT PUBLIC SCH/INGLEWOOD CHARTER H	143716	NOV	P73652	6/26/2020	10/8/2014	203 (A), 1415	1) Operating a diesel engine over 50HP without a permit to operate. 2) Failure to submit a 1415 registration plan every 2 years after initial registration for AC systems over 50lbs per circuit.
GREEN LIGHT MOTORS INC	182909	NC	E48296	6/21/2019	5/28/2019	203 (A)	modify permit to operate description to show correct count of exhaust filter openings
GUTIERREZ BODY SHOP	120322	NC	E46866	3/28/2019	3/28/2019	42303	provide daily log of paint usage and monthly paint supplier receipts
GUZMAN ENERGY	185419	NC	E40799	2/7/2020	1/21/2020	1148.1, 42303	Provide last two years of LDAR quarterly records; Provide last two years of throughput records; Post signage _ Instructions to call South Coast Air Quality Management District complaint hotline _ 1800) CUT_ SMOG
GUZMAN ENERGY	185419	NOV	P66546	2/7/2020	1/21/2020	203, 463, 1173,1148.1	Operating without permit; Failure to maintain vapor tight conditions; Failure to submit quarterly LDAR records per R1173
H&S ENERGY, LLC. H&S 24	160085	NC	E42315	3/2/2018	3/2/2018	461	Correct AQMD Signage Complaint Phone # to 800-242-4020; Provide copies of missing Vapor Recovery Test results from 02/08/2018 and 04/20/2017; Provide missing monthly gasoline throughput totals from January 2016 to February 2018
HAN'S ENTERPRISE INC	142646	NOV	P72150	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 4939

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	NOV	P72681	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 5992
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	NC	E49860	9/19/2019	9/19/2019	203	Make arrangements to pay all back fees associated with Permit # N31001 for activation (permit is expired)
HM PETROLEUM GROUP, INC. DBA ZY OIL	177513	NOV	P70222	2/11/2020	2/11/2020	203	Equipment does not match permit description: VR_105 and VR_204 is installed, however VR_102 and VR_202 is listed in current Permit # N31001
HOLLY PARK CLEANERS, KYUNG HOON SHIN	148353	NC	E48659	5/20/2019	5/20/2019	42303	Provide 2017 and 2018 records per Rule 1421
HOLLY PARK CLEANERS, KYUNG HOON SHIN	148353	NOV	P69302	6/26/2019	12/20/2017	203 (B)	Facility failed to comply with its permitted limit (55 gallons) for perchloroethylene usage during the 2017 calendar year.
HOME DEPOT #1039	146853	NC	E49748	3/12/2020	3/12/2020	42303	provide gas usage records for natural gas fuel cell
HOME DEPOT #1039	146853	NC	E49749	3/12/2020	3/12/2020	203 (A), 222	1) Submit a permit application or 222 registration as required for the fuel cell
HOOPER & SONS, INC	27405	NOV	P71819	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 0190 0000 63748391
HOOVER VALERO	154989	NC	E44726	8/2/2018	8/2/2018	461	Keep Daily and VST Weekly Maintenance Inspections up to date; Install missing AQMD Complaint signs at all dispensers
HWANG MUK CHOE	184181	NC	E43045	5/18/2018	5/18/2018	461	Provide throughput records of gasoline sold. Ensure all fueling points have AQMD required signage.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
HWANG MUK CHOE	184181	NOV	P77261	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 2280 0002 0330 5525
ICI ARCHITECTURAL MILLWORK	165059	NC	E49724	1/31/2020	1/31/2020	42303	provide proof of permit application for dust collector. provide SDS's for coatings.
ICOLOR PRINTING & MAILING INC	194065	NC	E51805	2/23/2021	2/23/2021	42303	provide 1) Mfg., model #, and serial # for five UV printing presses, 2) SDS's of all inks used, and 3) ink usage records for each printer
INNO STAR INC., DARLING CLEANERS	160962	NC	E48182	6/17/2019	6/17/2019	42303	Provide most recent receipt for maintenance of cooling coil and gaskets replacement.
INNOVATIVE SERVICE GROUP, LLC	186979	NC	E43606	4/18/2018	4/18/2018	40701(G)	PROVIDE EVIDENCE AND COPIES OF THE FOLLOWING: SECURE & STABILIZE DEBRIS; 1) 1166 LOGS; 2) PID/OVA CALIBRATION LOGS; 3) CONTRACT, CONTACT INFORMATION AND ADDRESS OF ENCON (GEN CONTRACTOR); 4) PHASE 1 & PHASE 2 REPORTS, INCL. ALL SOIL PROFILING DATA; 5) CSLB CONTRACTORS LICENSE; 6) PROOF OF AN ASBESTOS CONTAMINATION ASSESSMENT DONE BY A CERTIFIED ASBESTOS CONSULTANT ON SUSPECTED ASBESTOS MATERIAL; 7) PROOF OF PROCEDURE 5 PLAN, IF ASBESTOS IS VERIFIED ON SITE, SUBMIT TO SCAQMD FOR APPROVAL PRIOR TO CLEAN UP BY A LICENSED ASBESTOS ABATEMENT CONTRACTOR. *SUSPECT GASKETS AND COAL TAR WRAP.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
INSURANCE MASTERS & AUTO BODY REPAIR	157715	NC	E50566	12/27/2019	12/27/2019	109, 203	_Apply for SCAQMD Permit to Operate for spray booth (if not available), _Keep and provide records of paints/solvents sprayed in spray booth
INSURANCE MASTERS & AUTO BODY REPAIR	157715	NC	E52587	12/2/2020	12/2/2020	203	Provide proof of permit or obtain a permit to operate before using spray booth again
J & F OIL CORP	164307	NOV	P72449	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 5554
J B CHEMICAL	139723	NOV	P69566	6/27/2019	6/26/2019	203 (B)	operating mixing tanks without a valid permit to operate, failure to maintain lid while processing, failure to maintain records
J B CHEMICAL	139723	NC	E48303	6/28/2019	6/27/2019	42303	provide SDS's of each product mixing operation including, carnauba wax, engine degreaser, tire dressing, and solvent storage.
J&J AUTO CENTER, MARIO GARCIA	167592	NC	E47168	3/14/2019	3/14/2019	109, 203 (B), 1151, 1171	R109) keep and maintain VOC records, R203b) in accordance with permit conditions replace missing filters and fill manometer, R1171) use compliant cleaning solvent, R1151) use compliant solvent to reduce paint
J.R. WELDING, INC.	187130	NC	E47106	10/31/2019	10/31/2019	1171	Remove all noncompliant solvents from site and use only compliant solvents; Use only compliant gun cleaning solvents (Must be < 25 g/L VOC or Acetone)
J.R. WELDING, INC.	187130	NC	E53249	5/5/2021	5/5/2021	109 , 206	Maintain and demonstrate VOC recordkeeping, maintain permit to operate on or within 8 meters of equipment

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
J.R. WELDING, INC.	187130	NOV	P73871	5/5/2021	5/5/2021	203 (B), 1171(C)(1)	Using a spray gun cleaning solvent in excess of 25 g/l VOC. Exceeding permit limits.
JASON'S ARCO & MINI-MART	98105	NOV	P76720	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 1027
JEFF'S CLEANERS	82776	NC	E48454	5/13/2019	5/13/2019	42303	Provide Cooling coil cleaning and gasket replacement records.
JERRY BODY SHOP	158790	NC	E53242	3/24/2021	3/24/2021	109, 203 (A)	Apply for and maintain permit to operate for spray booth, maintain VOC emission records for facility, and maintain filters in good condition/in place correctly.
JERRY BODY SHOP	158790	NOV	P73870	4/21/2021	3/24/2021	203 (A)	Facility has not applied for a permit to operate for the automotive paint spray booth.
JEWELL CLEANERS	81974	NC	E48453	5/13/2019	5/13/2019	42303	Provide most recent hazwaste manifest, cooling coil cleaning and gasket replacement records.
JIMENEZ BODY SHOP	180004	NC	E32916	4/17/2018	4/17/2018	203 (B), 42303	provide SDS of paints and solvents used, provide records of VOCs for paints and solvents used, install filters that are 2 inches thick, calibrate manometer.
JIMENEZ BODY SHOP	180004	NC	E53243	3/24/2021	3/24/2021	109, 1151	Maintain VOC emission records for facility, remove noncompliant product from facility
JMP BODY SHOP	176945	NC	E32946	9/19/2019	9/19/2019	203 (B), 1171(C)(1)	add red ink to manometer; ensure exhaust filters are properly installed; ensure gun cleaning solvent is 25 g/L of VOC or less
JONES LUMBER CO INC	6438	NOV	P71304	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							Certified Mail Tracking #7017 2620 0001 1050 02231
JR BODY SHOP, JOSE A ENCINAS	151042	NC	E32935	5/8/2019	5/8/2019	42303	provide to the District copies of SDS's of paints/coatings used in active operations; provide to the District VOC recordkeeping from April 2019 to present;
JR BODY SHOP, JOSE A ENCINAS	151042	NC	E53248	5/5/2021	5/5/2021	109, 203, 206	Maintain active permit to operate by equipment, maintain filters and manometer in good condition, demonstrate SDS sheets to confirm compliance of products
JUNIOR AUTO BODY AND SALES	190564	NC	E52652	1/22/2021	1/22/2021	203 (B), 1171	Remove non-compliant product(s) from facility and maintain manometer on spray booth in good condition
JUNIOR AUTO BODY AND SALES	190564	NOV	P73866	1/22/2021	1/22/2021	1151(E)(1)	In possession of non-compliant product at facility; PCL Polyprimer
L & J DRY CLEANING, ALFRED HOWELL DBA	42127	NC	E46885	5/2/2019	5/2/2019	42303	provide SDS of petroleum solvent. Provide recordkeeping logs including daily inspection checklist, service repair log, daily usage log, monthly leak inspection, and annual report for 2018
LA CENTRAL IRON WORK	53045	NC	E52655	7/28/2021	7/28/2021	109, 203 (B)	Provide VOC emission records for the facility, repair manometer on facility spray booth.
LA CO., HUDSON COMPREHENSIVE HEALTH CTR	16305	NC	E44757	1/31/2019	1/31/2019	301, 1470	R1470(d)(1)(C) Provide operating information (including reason for Maintenance & Testing). R301 Contact Billing Services at 909.396.2900 to pay back fees for permit G8948.
LA CO., LYNWOOD REGIONAL JUSTICE CTR	73327	NC	E52654	7/1/2021	7/1/2021	203 (B)	Provide records for emergency generators and boilers

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
LA CO., MUSEUM OF NATURAL HISTORY	12056	NC	E47171	4/4/2019	4/4/2019	109, 1151, 203(B)	203(b) Change filters in accordance with permit conditions. R109 keep VOC recordkeeping in accordance with R109 and provide last two years of records, R1151 Provide SDS of all coatings without listed VOC
LA TRADE TECH COLL, LA COMMUNITY COLL	12989	NOV	P71338	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 2620 0001 1050 0569
LA UNI SCH DIST, BSC BUS GARAGE	7937	NOV	P71314	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 2620 0001 1050 0330
LA UNI SCH DIST, BSC BUS GARAGE	7937	NC	E46762	3/13/2019	3/13/2019	203	1) Obtain permit to operate for DPF regenerator. 2) Conduct annual reverification test on the same month every year.
LA UNI SCH DIST, BSC BUS GARAGE	7937	NOV	P66834	3/21/2019	1/1/2019	461 (E) (2)	Failure to conduct a reverification test annually
LEE'S ARCO	182885	NC	E45358	12/18/2018	12/18/2018	461, 41960	Repair rotated faceplate at nozzle # 10; provide missing 2018 Periodic Compliance Inspection record
LUIS BODY SHOP	150573	NC	E48273	5/17/2019	5/17/2019	42303	provide a record of all VOC containing coatings and solvents used for the past 12 months

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
LYNWOOD 76	178032	NC	E43147	4/6/2018	4/6/2018	461	RULE 461 (D)(4)(A) _ PROVIDE THE R461 CERTIFICATE (C)(2)(B) _ PROVIDE THE DAILY & WEEKLY INSPECTION RECORDS (E)(6)(B) _ PROVIDE THE 2018 REPAIR LOG (E)(2) _ PROVIDE THE MARCH 2018 AND SEP 2016 VAPOR TESTS (E)(6)(D) _ PROVIDE THE 2016 THROUGHPUT RECORDS
LYNWOOD 76	178032	NOV	P72790	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 4724
LYNWOOD 76	178032	NOV	P77136	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2836 9957
LYNWOOD 76 GAS STATION, OKDAK INC.	174199	NC	E43148	4/6/2018	4/6/2018	461	RULE 461 (E)(6) _ PROVIDE THE MONTHLY GASOLINE THROUGHPUT RECORDS FOR 2017 AND 2018, PROVIDE RECORDS OF THE DYNAMIC BACKPRESSURE AT THE DISPENSERS TEST (C)(1)(A)(V) _ MAINTAIN SPILL BUCKETS FREE FROM LIQUID AND DEBRIS
LYNWOOD 76 GAS STATION, OKDAK INC.	174199	NC	E43033	4/25/2018	4/14/2018	461	Conduct performance test including methodology 4 dynamic backpressure test, on next testing cycle month
LYNWOOD ARCO	140955	NOV	P72121	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 4090

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
LYNWOOD PETROLEUM, INC.	105544	NC	E44873	8/9/2018	8/9/2018	203 (B), 461	Provide recent ISD alarm log records. Repair/replace all fill and vapor caps that have missing gaskets. Replace torn boots on nozzles: 1, 2, 8, 10, 11, and 12. Provide records of weekly interlock checks. Provide recent records of daily vapor recovery
LYNWOOD PETROLEUM, INC.	105544	NOV	P67673	8/9/2018	8/9/2018	461, 41960.2	Failure to maintain equipment according to CARB Executive Orders. Operating a GDF with a major defect: vapor processor in manual mode. Failure to maintain equipment at a GDF in good working order.
LYNWOOD PETROLEUM, INC.	105544	NOV	P71914	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 3380 0000 7803 8229
LYNWOOD PETROLEUM, INC.	105544	NC	E53191	10/13/2021	10/13/2021	461	Repair/Replace middle UST fill cap (grey) _ missing gasket; missing most current (2021) Periodic Compliance Inspection record; PV Valve (Husky 5885) is suspected to be out of specs _ provide missing test results TP201.1E (within 3 years); Provide updated/
LYNWOOD PETROLEUM, INC.	105544	NOV	P70250	10/13/2021	7/1/2019	461, 41960	Failure to maintain gasoline dispensing system in good working order in accordance with the manufacturers' specification of the certified system; Operating a gasoline dispensing system contrary to CARB Executive Order, including the IOM _ torn whip hose/
LYNWOOD UNI SCH DISTRICT _SERVICE CENTER	96814	NC	E45219	11/2/2018	11/2/2018	42303	Provide 2016, 2017, 2018 annual reverification tests and any proof the records were submitted to SCAQMD.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
LYNWOOD UNI SCH DISTRICT _SERVICE CENTER	96814	NOV	P65227	12/11/2018	8/1/2017	461 (E) (2)	Failure to conduct annual reverification tests.
LYNWOOD UNI SCH DISTRICT -SERVICE CENTER	96814	NOV	P71577	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 3380 0000 7803 2975
LYNWOOD UNI SCH DISTRICT -SERVICE CENTER	96814	NOV	P76719	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2837 1530
M & B OIL CO	71584	NC	E51045	4/8/2020	11/15/2019	1173	R1173 (i)(1): submit in a timely manner; records as quarterly inspection reports to the Executive Officer no later than 30 days after the end of each quarter; For 3Q2019, 2Q2018
M & M GAS STATION & MINI MART	133117	NC	E44864	7/26/2018	7/26/2018	461	Repair/replace vapor cap on 91 tank that is missing the gasket. Replace torn boot on nozzle $6. Provide records of VST weekly inspections. Provide records of vapor recovery daily inspections. Provide 2016, 2017, and full 2018 monthly gasoline throughput
MAGIK AUTO BODY CORP	191537	NOV	P73855	10/15/2020	10/15/2020	1151(E)(1)	In possession of noncompliant product (PCL Polyprimer).
MAIN STREET VALERO	154188	NC	E44731	8/29/2018	8/29/2018	461	Replace curb hose at fueling point # 2 - flattened sections of hose; provide missing ISD Alarm / Repair log for review

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MAIN STREET VALERO	154188	NOV	P64950	8/29/2018	8/29/2018	461, 41960	Failure to maintain gasoline dispensing facility system in good working order in accordance with the manufacturer's specification of the certified system; Operating a gasoline dispensing system contrary to CARB Executive Order, Including the IOM -
MAIN STREET VALERO	154188	NOV	P76960	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4462
MALDONADO'S BODY SHOP	172228	NC	E32936	5/8/2019	5/8/2019	42303	provide to the District: VOC recordkeeping from April 1, 2019 to present; purchase invoices and SDS for PCL Polyprimer 901 gray surfacer; purchase invoice and SDS for Grow Auto HET 1380 and 1501; invoices and SDS for paint job of afternoon of 5/8/19;
MARINA SHELL #1	177549	NC	E43145	4/3/2018	4/3/2018	461	RULE 461 (E)(6)(D) _ PROVIDE THE 2018 MONTHLY GASOLINE THROUGHPUT RECORDS (C)(2)(B) _ REPLACE TORN HOSE ON #7, ENSURE THE NOZZLE A/L RANGE IS BETWEEN .95 AND 1.15
MARQUEZ SERVICE STATION	143070	NC	E43049	5/30/2018	5/30/2018	461	Repair/replace spill bucket on 87 tank. Ensure spill buckets are maintained free of liquid and debris. Provide throughput records of gasoline sold for last 2 years. Provide/maintain repair and maintenance log. Provide/maintain daily inspections. Provide/

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MARQUEZ SERVICE STATION	143070	NOV	P72155	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 4984
MARQUEZ SERVICE STATION	143070	NOV	P76883	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2837 2308
MARTIN LUTHER KING JR MEDICAL CAMPUS	2619	NC	E41275	3/30/2018	3/30/2018	3002(C)(1)	revise due date on 500_SAM (1st) and 500_ACC
MARTIN LUTHER KING JR MEDICAL CAMPUS	2619	NOV	P65278	9/26/2019	3/1/2019	3002(C)(1)	Failure to submit a monitoring report for the second half of 2018 by 2/28/19; failure to submit an annual compliance certification report for calendar year 2018 by 3/1/19.
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P65264	2/20/2018	2/20/2018	2004(F)(1), 401(B)(1)(B)	operation of a commercial dyeing and finishing facility in a manner that discharged light blue visible emissions of an opacity greater than 20 pct for over 3 min in one hour accumulatively; failure to comply with rules and conditions per RECLAIM permit
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P65266	2/28/2018	2/28/2018	402, 41700	Discharging such quantities of air contaminants which caused nuisance to a considerable numbers of persons or to the public
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P68053	4/17/2018	4/16/2018	402, 41700	R402 & CH&SC 41700 Discharging such quantities of air contaminants which caused a nuisance to a considerable number of persons or to the public.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P65267	5/3/2018	4/27/2018	402, 41700	Operation of a commercial dyeing and finishing RECLAIM facility in a manner that generated a public nuisance by discharging air contaminants which caused nuisance and annoyance to the public and endangered their comfort and repose.
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P65268	5/3/2018	5/1/2018	402, 41700	Operation of a commercial dyeing and finishing RECLAIM facility in a manner that generated a public nuisance by discharging air contaminants which caused nuisance and annoyance to the public and endangered their comfort and repose.
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P67108	5/15/2018	5/11/2018	402	Discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P68054	5/18/2018	5/17/2018	402, 41700	R402 & CH&SC41700: Operation of a commercial dyeing and finishing RECLAIM facility in a manner that generated a public nuisance by discharging air contaminants which caused nuisance and annoyance to the public and endangered their comfort and respose.
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P68057	8/8/2018	8/8/2018	402, 41700	402 & 41700 Discharging such quantities of air contaminants which caused a nuisance to a considerable number of persons or to the public.
MATCHMASTER DYEING & FINISHING INC	3029	NC	E46460	11/27/2018	11/1/2018	UNKNOWN	Provide Large Source and Process Unit tune-up reports for the period 07/01/2017 thru 06/30/2018

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P66216	11/27/2018	7/1/2017	2004, 2012	Inaccurate QCERs and APEP, Late QCER, Missing Process Unit electronic report, Missing Rule 219 electronic report
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P66228	11/12/2019	7/1/2018	2004, 2012	Inaccurate QCERs and APEP, Missing Process Unit quarterly electronic emission report
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P67397	12/10/2020	10/31/2019	2012, 2012 Appendix A	Violation description: 1) Failure of Facility Permit Holder to electronically report by device (C82) for each NOx process unit quarterly mass emissions of NOx to the District Central Station for quarters 1, 2, 3, & 4 of CY2019 and quarter 1 of CY2020. 2) Failure of Facility Permit holder of NOx equipment exempt from permit requirements pursuant to Rule 219 to electronically report quarterly emissions to the District Central Station for quarters 1, 2, 3, & 4 of CY2019 and quarter 1 of CY2020. 3) Failure of Facility Permit holder to electronically report aggregate quarterly emissions for the following: -Large NOx sources for quarters 1, 3, & 4 of CY2019 and quarter 1 of CY2020. -NOx Process Units for quarters 1, 2, 3, & 4 of CY2019 and quarter 1 of CY2020. -NOx equipment exempt from permit requirements pursuant to Rule 219 for quarters 2, 3, & 4 of CY2019 and quarter 1 of CY2020.
MATCHMASTER DYEING & FINISHING INC	3029	NC	E52919	11/30/2021	8/28/2021	2012	Submit source test reports within 60 days of the test date.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MATCHMASTER DYEING & FINISHING INC	3029	NOV	P74607	11/30/2021	7/1/2020	2004, 2012	1) Failure to submit accurate APEP report, 2) Failure to submit accurate 3rd qtr. QCER, 3) Failure to submit electronically Rule 219 NOx emissions for the 4th qtr. of CY2020 and 1st qtr. of CY2021.
MAYA STEEL FABRICATIONS INC	60284	NC	E41691	2/2/2018	2/2/2018	TITLE13ARTICLE5S	Placard shall be affixed on the registered engine (CARB #132857); Current registration must be kept on registered engine (CARB #132857,146415,146416)
MAYA STEEL FABRICATIONS INC	60284	NC	E41692	2/2/2018	2/2/2018	42303	Failure to provide and maintain records in accordance with the registered unit's operating condition (CARB Reg #132857,146415,146416)
MEADOW FARMS SAUSAGE CO INC	1918	NC	E49743	2/25/2020	2/25/2020	1146.2, 1147, 203, 222	BOILER: Install dedicated gas meter, begin maintaining a gas usage log. OVEN: submit 222 registrations. Cancel existing permit. Demonstrate NOx emissions compliance
MECHANICAL METAL FINISHING CO	17473	NC	E48922	6/14/2019	6/14/2019	203 (A), 203 (B)	Do not operate Tank #DS.9.314 _ Bright Dip without first obtaining a Permit to Operate. Correct dimensions of Tank #4 _ Spent Acid Tank, as permit to operate D29054 described the equipment to be 3' by 3' by 4'. Ensure equipment description (specifically
MECHANICAL METAL FINISHING CO	17473	NC	E48923	6/14/2019	6/14/2019	42303	Provide hydrochloric acid concentration in percent by weight for tank bath of tank #D2 _ Everite.
MENOS AUTO BODY REPAIR	193056	NOV	P73658	9/10/2020	9/10/2020	109, 203 (A)	1) operating a paint spray booth without a valid permit to operate 2) failure to maintain a spray log of all VOC coatings & solvents used.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MILLER'S CLEANERS	93019	NC	E48180	6/17/2019	6/17/2019	42303	Provide records for laundry poundage, daily & monthly inspection records, and solvent added.
MONICA'S CLEANERS	123451	NC	E51901	8/27/2020	8/27/2020	203	Apply for and maintain a permit to operate for the dry-cleaning machine.
MONTES BODY, MARUYN MONTES DBA	152183	NC	E32941	8/6/2019	8/6/2019	109, 203 (B)	fill manometer with liquid; retain invoices of Grow Automotive urethane reducer and other coatings and solvents on premises; maintain accurate VOC records of coating operations; maintain SDS of coatings on premises
MORRELL'S ELECTRO PLATING, INC	136913	NC	E27783	10/2/2018	9/26/2018	42303	PROVIDE COPIES OF UPDATED QUARTERLY CHECKLIST. PROVIDE UPDATED SMOKE TEST. SHOW PROOF OF R1469 CLASS REGISTRATION.
MORRELL'S ELECTRO PLATING, INC	136913	NC	E27786	10/17/2018	10/17/2018	42303	PROVIDE PAINT SPRAY RECORDS, HAZARDOUS WASTE MANIFEST AND NUMBER OF LOADS PERFORMED ON OCTOBER 11, 2018.
MORRELL'S ELECTRO PLATING, INC	136913	NOV	P66017	12/4/2018	10/17/2018	1469.1	FAILURE TO CONDUCT SPRAYING AND CLEAN UP OPERATIONS IN A MANNER THAT MINIMIZES FUGITIVE EMISSIONS OF ATOMIZED PAINT PARTICLES.
MWM WORKS LLC	190114	NC	E48284	5/28/2019	5/28/2019	42303	provide coating/solvent usage log beginning from January 2019
MWM WORKS LLC	190114	NC	E48285	5/28/2019	5/28/2019	203, 203 (B), 1151, 1171	apply for a permit modification to reflect the correct number of paint spray booth exhaust filters. install missing exhaust filters. remove non-compliant coatings (PCL Primer, Grow 1370 reducer) and solvents (prep all).

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
MY UNCLE'S CLEANERS	187129	NC	E48318	9/5/2019	9/5/2019	42303	Provide a copy of operational record keeping including, daily poundage log, daily inspection checklist, monthly leak inspection, annual report, and service repair log for the previous 2 years
MY UNCLE'S CLEANERS	187129	NOV	P69579	9/26/2019	9/5/2019	203 (A), 1102	Operating a Solvent dry-cleaning machine without a valid permit to operate. Failure to maintain and present operational records including, Poundage Log, solvent receipts, annual report, leak inspection, & repair log.
NIETO'S STATION	160499	NC	E44727	8/2/2018	8/2/2018	461	Repair or replace 91/West UST drybreak (orange) vapor cap - missing gasket; Late testing conducted 10/11/2017 - conduct next Vapor Recovery Reverification test in September 2018 to remain on September test schedule; PV Valve suspected to be out of specs -
NIETO'S STATION	160499	NOV	P64945	8/2/2018	10/1/2016	461	Failure to conduct Vapor Recovery reverification tests annually (2016)
NIETO'S STATION	160499	NOV	P76999	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4646
NIKRAD ENTERPRISES INC	118537	NC	E42312	2/21/2018	2/21/2018	461	Diagnose and Repair "Readiness ISD" event; daily details show no V/L collection at Fueling Point #s 10, 11 & 12 (see attached reports for review);Provide most current Daily & Weekly Maintenance

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							inspection records; Provide most current ISD Alarm & Repair
NIKRAD ENTERPRISES INC	118537	NC	E50829	2/4/2021	2/3/2021	461	Conduct next Reverification Test in the month of July 2021 to remain on a January / July test schedule (late R461 test was conducted 02/03/21)
NIKRAD ENTERPRISES INC #1	103838	NC	E46436	1/3/2019	1/3/2019	461	Re-install AQMD/Nozzle Operation signage at all dispensers ((old signs were painted over) - use Complaint # 800-242-4020 on signs; provide missing 2018 Periodic Compliance Inspection record; provide missing September 2018 Vapor Recovery test records
NIKRAD ENTERPRISES INC #5	115702	NC	E45437	9/7/2018	9/7/2018	206, 461	Ensure Permit #N31476 is posted. Repair/replace vapor cap of 87 tank that has a missing gasket. Maintain VST weekly insertion interlock inspections. Provide 7/5/16 performance test results. Provide current monthly throughput records for 2018.
NIKRAD ENTERPRISES INC #5	115702	NOV	P67677	9/7/2018	6/25/2017	203 (B), 461	Failure to record all ISD alarms and associated repairs on an ISD alarm log. Resetting ISD alarms without proof of repairs. Misuse of the clear test after repair (reset) function. Operating a GDF after a failed vapor recovery test: failed torque test on
NOBLE'S AUTO BODY SHOP	179602	NC	E48274	5/17/2019	5/17/2019	42303	Begin maintaining a record of all VOC containing coatings and solvents used.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
NORMANDIE CLEANERS, LAURA NAJERA	124794	NOV	P73655	8/27/2020	8/27/2020	203 (A), 1421	1) operating with a valid PERC dry cleaning machine w/o a permit to operate. 2) Expired ATCM certificate, 3) No operational records, 4) No PERC purchase receipts & 5) No proof of cooling coil or gasket maintenance.
ORIGINAL AUTO BODY AND PAINT	187104	NC	E07583	3/21/2018	3/21/2018	203, 1151	(1) Submit application for Permit to Operate paint spray booth; (2) Maintain records of coating and solvent usage.
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	NC	E39492	2/16/2018	2/16/2018	222	Submit cooling tower registrations.
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	NOV	P66163	10/5/2018	4/26/2018	2004	Failure of Facility Permit holder to submit 2017 Cycle 2 Quarter 3 QCER with accurate emissions
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	NC	E50413	12/10/2019	7/30/2019	2012	Perform Relative Accuracy Audit of the fuel measuring device
OWENS CORNING ROOFING AND ASPHALT, LLC	35302	NC	E50421	11/17/2020	10/30/2019	2004	Inaccurate QCER Inaccurate APEP
PACIFIC ELITE COLLISION CENTER _ LOS ANG	187025	NC	E42887	3/14/2018	3/14/2018	203 (A), 203 (B)	R203(a) All Permits should be changed to "Pacific Elite Collision Center _ Los Angeles" via Change of Operator form. R203(b) Keep Prep Stations in proper operating conditions
PALLET MASTERS INC	109693	NOV	P73875	7/20/2021	7/20/2021	1137	Failure to reduce saw dust emissions, no enclosure or shroud, failure to cover sawdust storage bins

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
PALLET MASTERS INC	109693	NOV	P73878	9/17/2021	9/17/2021	1137	Failure to reduce sawdust emissions through an enclosure or shroud connected from the emission control device to waste storage bin. Failure to cover sawdust storage bin at all times except during the initial disconnection from the enclosure or shroud.
PAL'S TRANSMISSION	190144	NC	E34298	5/23/2019	5/23/2019	1171	Use compliant cleaning solvent
PANROSE CORPORATION, INC.	166842	NC	E44101	4/12/2018	4/12/2018	203	RULE 203 _ APPLY FOR AN ADMIN CHANGE TO PERMIT N26101. FACILITY HAS 8 NOZZLES (24 PRODUCTS) NOT 10 NOZZLES (39 PRODUCTS).
PANROSE CORPORATION, INC.	166842	NOV	P77036	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4868
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	NOV	P72460	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1660 5660
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	NC	E46448	2/5/2019	2/5/2019	461	Provide access to Vapor Recovery Records / Operation & Maintenance Manual which includes (1) Daily/Weekly/Quarterly maintenance records, (2) ISD Alarm and Repair logs, (3) Vapor Recovery test records full results, (4) gasoline throughput monthly records,

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	NOV	P68416	2/5/2019	4/1/2018	461, 41960	Failure to maintain gasoline dispensing system in good working order in accordance with the manufacturers' specification of the certified system; Operating a gasoline dispensing system contrary to the CARB Executive Order, including the IOM - uncertified
PARAMOUNT OIL, INC. DBA ALONDRA 76	165182	NOV	P68422	3/14/2019	3/2/2019	461	Failure to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1st following each calendar year: 2018 data due 03/012019
PARKLANE CLEANERS	100918	NC	E48661	5/22/2019	5/20/2019	1421	Obtain a valid CARB certificate
PARKLANE CLEANERS	100918	NC	E48662	5/22/2019	5/20/2019	42303	Provide 2017 and 2018 records per Rule 1421, and provide a copy of previous month's gas bill
PARKLANE CLEANERS	100918	NC	E53240	3/12/2021	3/12/2021	206, 1102	Maintain permit to operate for equipment on or within 8 meters, maintain and present recordkeeping for dry cleaning equipment
PCH OIL ENTERPRISE, INC	178023	NC	E50814	2/26/2020	2/26/2020	461	Provide missing June 2019 Periodic Compliance Inspection record; Provide missing Vapor Recovery test results from June 2019 and December 2018; Provide missing current TP201.1E PV Valve test results (within 3 years)
PERFECT PAINT & BODY	143923	NC	E53296	6/10/2021	6/10/2021	109, 203 (A), 203 (B)	Repair manometer on spray booth; Provide VOC records for the past 2 years; Provide documentation of spray booth heater specs.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
PERFORMANCE COMPOSITES, INC	140552	NOV	P65869	4/16/2019	4/16/2019	3002(C)(1), 3004	FAILURE TO SUBMIT ACC FORM FOR 2018 BY 3_1_2019; FAILURE TO MAINTAIN APPROPRIATE PAINT SPRAY BOOTH MAINTENANCE RECORDS, OPERATING 2 PAINT SPRAY BOOTHS WITH A MANOMETER GAUGE READING ABOVE 0.25 INCHES OF WATER.
PERFORMANCE COMPOSITES, INC	140552	NC	E52595	6/9/2021	6/9/2021	3002	Resume keeping required VOC records on pertinent booths and weekly pressure differential records
PERFORMANCE COMPOSITES, INC	140552	NC	E52596	6/9/2021	6/9/2021	42303	Provide proof of 500 SAM Submittal
PERFORMANCE COMPOSITES, INC	140552	NOV	P69547	7/15/2021	9/1/2020	3002	Failure to submit Form 500 SAM_1 by the due date
PHILLIPS 66 PIPELINE LLC	171326	NC	E22541	8/23/2018	3/29/2018	3002	Resubmit Title V 500 SAM Correct Date
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	NOV	P69589	2/20/2020	2/18/2020	401(B)(1), 41701	exceeding visible emission limits for over 3 minutes in 1 hour
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	NOV	P69592	3/3/2020	2/27/2020	401(B)(1)	exceeding visible emissions limit for more than 3 minutes in 1 hour
PHILLIPS BAR B QUE, FOSTER PHILLIPS	142441	NOV	P73554	6/26/2020	6/23/2020	401(B)(1)	
PIDLUK INC	177666	NC	E50827	1/14/2021	1/14/2021	461	Facility is currently on a December test schedule _ Reverification Test conducted 01/14/21. Conduct next Reverification Test in December 2021 to remain on schedule.
PL DEVELOPMENTS	178775	NC	E47458	6/20/2019	6/20/2019	2202	SUBMIT RULE 2202 EXEMPTION REQUEST FORM
PLANNED PARENTHOOD LOS ANGELES	156787	NC	E47165	3/7/2019	3/7/2019	203 (B), 206, 1470	R203(b) Operating ICE contrary to permit conditions, R206 Failure to post permit within 8 meters of equipment, R1470(d)(1)(C) provide, keep, and maintain records in accordance with R1470 subsections (i)-(vi).

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
POLYNT COMPOSITES USA INC	168088	NOV	P57884	4/4/2018	1/1/2017	2004	(1) Failed to reconcile qtrly NOx emissions in the 4th Qtr. (2Nox emissions from the beginning of cycle 1, CY2017 compliance year through the end of the 4th Qtr. exceeded the annual NOx emissions Allocations in effect at the reconciliation period of that
PRESTIGE AUTO BODY & PAINT	189445	NC	E48282	5/28/2019	5/28/2019	203, 203(B)	apply for a permit modification to reflect the correct number of paint spray booth exhaust filters. Calibrate manometer on spray booth.
PRESTIGE AUTO BODY & PAINT	189445	NC	E48283	5/28/2019	5/28/2019	42303	provide a record of all VOC containing coatings and solvents used for the past 6 weeks
PRESTIGE HOME IMPROVEMENTS, INC.	192091	NOV	P70283	4/14/2020	3/26/2020	403	Allowing trackout in excess of 25 cumulative feet at this location.
PRESTIGE HOME IMPROVEMENTS, INC.	192091	NC	F10858	4/24/2020	4/17/2020	42303	Please provide evidence and copies of the prior asbestos survey, any asbestos removal and demolition notifications, contracts, building and safety permits, and specify which asbestos removal procedure was used.
PRESTIGE HOME IMPROVEMENTS, INC.	192091	NOV	P74303	5/26/2020	4/17/2020	1403	Failure to perform an asbestos survey prior to a demolition, failure to notify the South Coast AQMD of the intent to conduct a demolition activity.
QAP METAL FINISHING	182848	NC	E50843	2/28/2020	2/28/2020	203 (A)	Do not operate equipment without valid permits to operate or registrations. All tanks shall be clearly identified and labeled. An ID tag shall be affixed to the rectifiers. Register boiler with Rule 222 registration.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
QAP METAL FINISHING	182848	NC	E50846	3/6/2020	2/28/2020	42303	Provide evidence and copies of chemical concentration records, operation records, exceedance records, amp_hr records, process description, heating records for past 2 years.
QAP METAL FINISHING	182848	NC	E50853	4/21/2020	2/28/2020	203 (B), 219	Tanks in the line shall only contain the chemicals specifically identified in the equipment description of the permits. The tanks shall be operated at or below the permit parameters. The chemical concentration records shall be maintained (wt.%).
RAFFI'S CHEVRON	128753	NOV	P65262	1/5/2018	1/4/2018	203(A)	Operating a gasoline dispensing facility without a valid permit to operate. [ISD installed does not match ISD version on the permit's equipment description].
RAMIREZ BODY SHOP LLC	193600	NC	E51802	12/11/2020	12/11/2020	109, 1171	1) begin maintaining a record of all VOC containing coatings and solvents sprayed per day 2) Remove non-compliance cleaning solvent
RASHID & SONS INC	137111	NC	E44865	7/27/2018	7/27/2018	461	Repair/replace vapor cap on tank farthest from store that has a missing gasket. Ensure spill buckets are maintained clear of liquid and debris. Replace torn boots on nozzles 1 and 8.
RASHID & SONS INC	137111	NC	E49868	10/31/2019	10/31/2019	461	Repair or Replace Balance Nozzle at Fueling Point #2 _ Sticky interlock on B check; Missing nozzle operation/AQMD Signs at Fueling Points 6 &8; Wrong Phone # at Nozzle Operation/AQMD signs at 1 to 5, 7 _ # should be 800_242_4020; provide copy of 2019

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
RASHID & SONS INC	137111	NOV	P70212	10/31/2019	3/2/2019	461	Failure to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1st following each calendar year: 2018 data (due 3/1/19)
RASHID & SONS INC	137111	NOV	P70215	11/14/2019	8/21/2019	203, 461	Operating without a valid permit _ failure to install Veeder_Root ISD Software Version 1.05; Failure to conduct Performance Test within ten (10) calendar days after initial operation of dispensing fuel
REA CLEANERS INC	110751	NC	E32917	4/24/2018	4/24/2018	206, 1102, 42303	post permit to operate near equipment, maintain records of solvent usage, weight of material, and leak inspections on premises, provide safety data sheets of solvents
REA CLEANERS INC	110751	NC	E51890	7/8/2020	7/8/2020	1102	Maintain all paperwork for the machine. Poundage, daily checks, monthly leak checks, annual mileage, repair log.
REBORN ANTIQUES	166563	NC	E49732	2/7/2020	2/7/2020	109	provide spray log of all VOC containing coatings & solvents sprayed
RELIANCE CLEANERS	35472	NC	E46299	5/1/2019	4/29/2019	1402, 1421, 42303	Update annual perc limit to 70 gallons for P/O F55850. Obtain valid CARB certificate. Provide recordkeeping for per R1421
RICHARD'S SHELL STATION	169438	NC	E42322	3/20/2018	3/20/2018	461	Replace shear pin (top) at FP # 8 Breakaway; Repair/Replace FP#8 nozzle (leaking); Repair or replace drybreak vapor cap (orange) at South UST - missing gasket; P/V Cap suspected to be out of specs - provide current TP201.1E test results for P/V Cap

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
RICHARD'S SHELL STATION	169438	NOV	P77045	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4912
RIVKAH, INC.	136643	NC	E49869	10/31/2019	10/31/2019	461	Install missing Nozzle Operation/Clean Air/AQMD Signage (w/Phone # 800_242_4020) at all dispensers; Provide 2019 Daily & Weekly Maintenance Inspection records; Provide updated ISD Alarm and Repair log from July 2019 to October 2019; Provide updated
RIVKAH, INC.	136643	NC	E50832	3/31/2021	3/30/2021	461	Maintain a June / December test schedule. Conduct next vapor recovery test in December 2021 (Performance Test was 12/10/2007)
ROBERTO'S BODY N PAINT	122570	NC	E44905	7/25/2019	7/25/2019	203, 1171	1) Make sure manometers are functioning properly, 2) Keep daily records of paint/solvent usage, 3) Use only compliant cleaning solvents (<25 g/L VOC).
ROBERTSON'S READY MIX	134112	NOV	P65057	2/9/2018	2/9/2018	203 (B), 1155	The baghouse shall not be operated contrary to the conditions specified in the permit. The operator of a facility shall not cause or allow any visible emissions from any PM air pollution control device required to have permit.
ROBERTSON'S READY MIX	134112	NOV	P69582	10/17/2019	10/15/2019	403	Allowing track-out of 25ft or more in cumulative length from the point of origin from an active operation
ROOP CORPORATION	172857	NOV	P77074	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 0190 0000 6375 9342

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
ROOP CORPORATION	172857	NOV	P70242	6/25/2021	6/22/2021	461	Operating Gasoline Dispensing Facility components after failed testing: Dispensers 3/4 and 7/8 (Phase II testing)
ROOP CORPORATION	172857	NOV	P70244	7/1/2021	7/1/2021	461	Operating gasoline dispensing facility components after failed testing: Dispenser 3/4 failed TP201.4 Method 1 (blockage)
ROSECRANS ENERGY	156312	NC	E46273	4/26/2019	4/26/2019	1118.1	Submit a Rule 1118.1 notification of flare inventory and capacity form.
ROSECRANS ENERGY	156312	NC	E52042	4/22/2020	8/1/2018	1173	R1173(i)(1): Submit R1173 4Q2019, 3Q2019, 1Q2019, 3Q2018, 2Q2018 Quarterly Reports on time; records are quarterly inspection reports sent to the Executive Officer no later than 30 days after the end of each calendar quarter. To document past violation
ROSECRANS ENERGY	156312	NC	E52043	4/22/2020	5/1/2018	1173	R1173(i)(1): Provide record of R1173 4Q2018, 1Q2018 Quarterly Report; records are quarterly inspection reports sent to the Executive Officer no later than 30 days after the end of each calendar quarter. NC issued to review missing records.
ROSEY'S AUTO SERV CTR	21671	NC	E48305	7/12/2019	7/12/2019	109	Begin maintaining a record of all VOC containing coatings and solvents used.
ROSEY'S AUTO SERV CTR	21671	NC	E48306	7/12/2019	7/12/2019	1151, 1171, 203 (B), 206	repair rust damage on spray booth, calibrate manometer, remove non-compliant coatings & solvents, post copy of permit
RUBENS BODY SHOP	177052	NC	E51891	7/23/2021	7/23/2021	203 (A), 203 (B)	Apply for permit to operate, replace filters
S & K PLATING INC	15021	NC	E27803	1/3/2018	1/2/2018	1469	conduct smoke test at least once every six month of a previously conducted test
S & K PLATING INC	15021	NC	E27814	2/13/2018	2/2/2010	1469	Submit Ongoing Compliance Status and Emission Report for calendar year of 2017 to SCAQMD.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
S & K PLATING INC	15021	NC	E39823	5/3/2018	5/3/2018	203 (B)	REPAIR THE STATIC DIFFERENTIAL PRESSURE GAUGE FOR THE VENTURI SCRUBBER AND MAINTAIN IN GOOD OPERATING CONDITION AND ACCORDING TO PERMIT CONDITIONS; CONDUCT A CHEMICAL ANALYSIS FOR EACH TANK AND PROVIDE THE CONCENTRATION IN % BY WEIGHT. CONDUCT THIS AT LEAST ONCE A MONTH FROM THIS DAY FORWARD AND MAINTAIN THE LOG/RECORDS FOR MINIMUM OF FIVE YEARS.
S & K PLATING INC	15021	NC	E43680	3/19/2019	3/19/2019	1469, 203 (B)	- Clearly label each tank within the tank process area with a tank #, SCAQMD Permit #, bath contents, max conc (ppm) of hexavalent chromium, operating temperature range, any agitation methods used, and designation of whether it is a Tier I, II, or III Hexavalent Chromium Tank if applicable. - Clean the nickel solution residue on the floor around the nickel filter tank. - Repair the static pressure gauge on the Push Air manifold on Tank #24.
S & K PLATING INC	15021	NC	E43691	9/3/2019	9/3/2019	203 (B)	REPAIR THE DIFFERENTIAL PRESSURE GAUGE FOR THE PREFILTER ON THE AIR POLLUTION CONTROL SYSTEM VENTING THE CHROME TANK.
S & K PLATING INC	15021	NC	E46055	5/11/2020	3/11/2020	203(A), 222	R222_Register the Parker Boiler (MN T970); R203(A)_Obtain a PC/PO for the Sulfuric Acid Anodize tank line.
SAL'S AUTO BODY & PAINT INC.	118768	NC	E46869	4/9/2019	4/9/2019	203(A), 206	Spray booth may not be operated without a valid permit to operate Permit # G08550 & # F62728. Post a copy of permit within

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							26ft of the spray booth: reference permit # G4279
SAL'S AUTO BODY & PAINT INC.	118768	NC	E46870	4/9/2019	4/9/2019	42303	provide a copy of the monthly log of LB's of VOC sprayed (2 years) and paint waste manifest receipts (2 years)
SAM'S CHEVRON	153477	NC	E45439	9/12/2018	9/12/2018	461	Replace torn boot on nozzle #2. Maintain vapor recovery daily inspections. Provide R461 required daily inspections training certificate. Provide 2018 periodic compliance inspection. Provide complete 2017 and 2018 monthly throughput records.
SANG HAN ENTERPRISE INC	142730	NC	E44883	8/30/2018	8/30/2018	206, 461	Ensure Permit #N30941 is posted. Ensure all dispensers have AQMD required decals posted visibly at all fueling points.
SANG HAN ENTERPRISE INC	142730	NOV	P67676	8/30/2018	7/1/2018	461	Failure to conduct vapor recovery reverification test semi-annually when monthly gasoline throughput is over 100,000 gallons
SENTINEL PEAK RESOURCES CALIFORNIA LLC	184292	NOV	P66511	1/17/2019	12/20/2018	203	The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. The equipment shall be properly maintained and kept in good operating conditions at all times.
SEWER AND PIPELINE	190619	NC	E48317	8/15/2019	8/7/2019	403(D)(2), PERP 2456	403 Implement best available control measures (BACM) to minimize airborne fugitive dust emissions (dust pile, digging, vehicle traffic. PERP Post a copy of valid ARB registration and/or affix ARB registration sticker.

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SEWER AND PIPELINE	190619	NC	E49752	5/1/2020	4/12/2020	403	Implement BACM to minimize fugitive dust and track-out
SIERRA FURNITURE, INC.	152107	NC	E32931	3/14/2019	3/14/2019	42303	42303_ Provide to the district VOC records of all coatings applied in spray booth from January 1, 2018 to present. Provide to the District SDS information on sealer, lacquer, and stain used in spray booth.
SIERRA FURNITURE, INC.	152107	NC	E47101	10/17/2019	10/17/2019	403	Do not allow the emission of fugitive dust such that the dust remains visible in the atmosphere beyond the property line of the emission source.
SLAUSON AUTO RESTORATION	136947	NC	E42878	2/2/2018	2/2/2018	109, 1171, 203 (A)	203(a) _ apply for a permit, pay fees, make sure PSB is in good operating condition. 109 _ keep records of VOC usage, 1171 _ remove HET 1390 from the site, use compliant cleaning materials
SLAUSON COLLISION CENTER	194214	NC	E52733	3/31/2021	3/31/2021	109, 1151(E)(1)	1) Discontinue use of Grow 1501 Thinner for primer and use only compliant products; 2) Keep and maintain VOC records.
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	NC	E44872	8/7/2018	8/7/2018	203 (B), 461	Maintain ISD alarm log with all instances of alarms, repairs made after alarms, and alarm clearing events
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	NOV	P72625	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0040 0000 1659 6548
SLAUSON OIL INC. DBA AHN'S MOBIL	175172	NOV	P77107	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2836 9773

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
SOLOFAB CORP	191753	NC	E49731	2/7/2020	2/5/2020	109, 203 (A)	apply for a permit to operate paint spray booth. begin maintaining a spray log of all voc containing coatings & solvents
SOUTH CITY GAS	137146	NOV	P64940	6/28/2018	6/28/2018	41960, 461	Failure to maintain gasoline dispensing system in good working order in accordance with the manufacturers' specification of the certified system; Faulty interlock verified by field test - Nozzle # 2 (failed "A" check); Operating gasoline dispensing system
SPECTRUM PLATING CO	142710	NC	E51162	11/4/2020	11/4/2020	42303	Provide evidence and copies of chemical concentrations in percent by weight, operation records, exceedance records, amp_hr records, process description, heating setpoint(s) for all South Coast AQMD permitted lines for past 2 years.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
SPECTRUM PLATING CO	142710	NC	E51163	11/4/2020	11/4/2020	203(B)	-P/O G10613(Scrubber) Condition #2: Equipment shall be properly maintained and kept in good operating condition. Condition #5: Install functional flow meter (indicating GPM) in the liquid recirculation line Condition #7: Install functional mechanical gauge (indicating inches of water column (so it may be easily viewed Condition #11: Install functional pH meter, that shall be calibrated at least once per month -All tanks shall be clearly identified and labeled with appropriate tank #s as designated in the equipment description (directly affixed and easily readable) for all South Coast AQMD permitted lines/tanks -P/O G31040 (Line #16): Comply with condition #10 = ID tag or label shall be affixed to rectifier in a permanent and conspicuous position.
ST. FRANCIS MEDICAL CENTER	14924	NC	E40943	5/17/2018	3/22/2018	2202	Submit emission reduction strategy with option chosen along with all filing fees and applicable late fees.
ST. FRANCIS MEDICAL CENTER	14924	NOV	P67010	8/2/2018	7/15/2017	2202	FAILURE TO REGISTER WITH THE DISTRICT TO IMPLEMENT AN EMISSION REDUCTION PROGRAM BY THE ANNUAL DUE DATE.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
ST. FRANCIS MEDICAL CENTER	14924	NOV	P67015	2/1/2019	7/15/2018	2202	FAILURE TO REGISTER WITH THE DISTRICT TO IMPLEMENT AN EMISSION REDUCTION PROGRAM BY THE ANNUAL DUE DATE.
STATE3	194155	NC	E51806	2/25/2021	2/25/2021	109, 222	1) begin a log documenting usage of all VOC coatings, inks, additives, and solvents used. 2) Submit a Rule 222 registration application for the boiler
STICKS LYNWOOD AND SGLA LYNWOOD LLC	193286	NC	E52885	10/21/2020	10/14/2020	1466, 40701(G)	Please provide PM10 monitoring records, stockpile inspection logs, volumes of soil moved, shipping manifiests, any contracts and scope of work documents for any employees or contractors hired by this facility, and other required records listed under
STICKS LYNWOOD AND SGLA LYNWOOD LLC	193286	NOV	P74334	11/12/2020	10/14/2020	403, 403(D)(1), 403(D)(2), 1466	Failure to calculate two_hour PM10 concentration averages at the top of each hour, conducting earth_moving activities without a windscreen, failure to adequately wet the jobsite, failure to wet at frequencies to prevent fugitive dust plumes, failure to

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
STUTZMAN PLATING CO	18845	NC	E40449	3/21/2018	3/21/2018	203, 1469	DURING TANK OPERATION OF TRIVALENT CHROME PLATING TANK #3A, USE POLYBALLS (OR APPROVED ALTERNATIVE) TO CONTROL CHROMIUM EMISSIONS. PROVIDE DOCUMENTATION FROM MANUFACTURERS FOR AMP-HOUR METER CALIBRATION RECOMMENDATIONS. SUBMIT PERMIT INACTIVATION FORMS FOR M12285 AND D85405. AT LEAST ONCE PER MONTH, DETERMINE THE CONCENTRATION OF NICKEL AND CHROMIC ACID VIA QUANTITATIVE CHEMICAL ANALYSIS. AT LEAST ONCE PER MONTH, DETERMINE THE CONCENTRATIONS OF ALL OTHERS LISTED IN PERMIT BY ESTIMATING (OPERATING LOSSES AND REPLENISHMENTS). RECORD CONCENTRATIONS OF CHEMICALS WEEKLY WHEN TANKS ARE OPERATED.
STUTZMAN PLATING CO	18845	NC	E45872	3/21/2019	3/21/2019	1469	Rule 1469 requirements
SUPERIOR GROCERS	161325	NC	E53290	4/29/2021	4/29/2021	203(B)	Keep and maintain engine operation log showing emergency use, maintenance and testing hours, other.
SW PLATING CO	9489	NC	E43463	3/27/2018	2/2/2018	1469	FAILURE TO SUBMIT ANNUAL ONGOING COMPLIANCE STATUS AND EMISSION REPORTS ON OR BEFORE FEBRUARY 1ST.
SW PLATING CO	9489	NC	E47296	6/14/2019	6/14/2019	42303	Provide evidence and copies of 2018 Ongoing Compliance Status and Emissions Report

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
SW PLATING CO	9489	NC	E48095	9/13/2019	9/13/2019	1469	Provide records for 2017, 2018, and 2019 for: surface tension records (o)(5) fume suppressant additions (o)(9) and product information cumulative rectifier usage hexavalent chromium concentration for hard chrome plating tank No. 2
TARGET LOS ANGELES, T_1306	121461	NOV	P73555	10/13/2020	10/13/2020	203	Operation of an IC Engine > 50 HP without a vallid permit to operate.
TESORO (USA) 63033	171715	NC	E42321	3/20/2018	3/20/2018	461	Provide TP201.1E test results for new OPW 723V Pressure/Vacuum cap installed (last results on file dated 05/24/16 for 3 Husky 5885 caps)
THE GOOD SHEPARD MANOR	115709	NC	E49725	1/31/2020	1/31/2020	42303	provide specification for gasoline emergency engine generator
THE HOME DEPOT, U.S.A. INC.	122737	NC	E48309	7/30/2019	7/30/2019	109, 206, 222	Post a copy of the permit. Begin maintaining an operations log for emergency generator. Submit 222 registration for fuel cell
THE ONE STOP AUTO COLLISION	172689	NC	E50560	11/22/2019	11/22/2019	1151	Remove all old non_compliant paints from site
TIPCO ENGINEERING	186509	NC	E51756	4/17/2020	4/17/2020	PERP 2460	Submit a PERP Appointment Request form for CARB certified equipment.
TONY'S BODY SHOP	191580	NOV	P69585	1/17/2020	1/17/2020	1151(E)(1), 1171	Possession of an automotive coating in excess of VOC limits by an automotive coating applicator. Using a solvent that exceeds VOC limits to clean
TORRES AUTO REPAIR AND BODY SHOP	164626	NC	E53256	6/18/2021	6/18/2021	109, 203 (B), 206	Maintain permit to operate on or near equipment, replace filters in spray booth, maintain manometer in functional condition, maintain and present VOC emission recordkeeping

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
TRIUMPH PROCESSING, INC.	800267	NOV	P66274	3/28/2018	2/14/2018	1469.1, 3002	FAILURE TO CONDUCT CHROMIUM COATING SPRAYING AND CLEANUP OPERATIONS IN A MANNER THAT MINIMIZES FUGITIVE EMISSIONS OF ATOMIZED PAINT PARTICLES. FAILURE TO OPERATE A TITLE V FACILITY IN COMPLIANCE WITH ALL TERMS, CONDITIONS AND EQUIPMENT SPECIFIED IN THE TITLE V PERMIT AT ALL TIMES. SPECIFICALLY - SECTION D CONDITION H23.2 OF FACILITY PERMIT TO OPERATE - FAILURE TO COMPLY WITH THE APPLICABLE REQUIREMENTS OF RULE 1469.1.
TRIUMPH PROCESSING, INC.	800267	NOV	P66293	7/12/2018	5/24/2018	1469.1, 3002	FAILURE TO CONDUCT CHROMIUM COATING SPRAYING AND CLEANUP OPERATIONS IN A MANNER THAT MINIMIZES FUGITIVE EMISSIONS OF ATOMIZED PAINT PARTICLES. FAILURE TO OPERATE A TITLE V FACILITY AND ALL EQUIPMENT LOCATED AT A TITLE V FACILITY IN COMPLIANCE WITH ALL TERMS, CONDITIONS AND EQUIPMENTS SPECIFIED IN THE TITLE V PERMIT AT ALL TIMES. SPECIFICALLY - SECTION D CONDITION H23.2 OF FACILITY PERMIT TO OPERATE - FAILURE TO COMPLY WITH THE APPLICABLE REQUIREMENTS OF RULE 1469.1.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
TRIUMPH PROCESSING, INC.	800267	NOV	P65408	9/21/2018	7/3/2018	1469.1, 3002	FAILURE TO CONDUCT CHROMIUM COATING SPRAYING AND CLEAN UP OPERATIONS IN A MANNER THAT MINIMIZES FUGITIVE EMISSIONS OF ATOMIZED PAINT PARTICLES. FAILURE TO OPERATE A TITLE V FACILITY IN COMPLIANCE WITH ALL TERMS, CONDITIONS, & EQUUIPMENT SPECIFIED IN THE TITLE V PERMIT AT ALL TIMES. SPECIFICALLY: - SECTION D CONDITION H23.2 OF FACILITY PERMIT TO OPERATE - FAILURE TO COMPLY WITH THE APPLICABLE REQUIREMENTS OF RULE 1469.1
TRIUMPH PROCESSING, INC.	800267	NOV	P65409	9/21/2018	7/12/2018	1469.1, 3002	FAILURE TO CONDUCT CHROMIUM COATING SPRAYING AND CLEAN UP OPERATIONS IN A MANNER THAT MINIMIZES FUGITIVE EMISSIONS OF ATOMIZED PAINT PARTICLES. FAILURE TO OPERATE A TITLE V FACILITY IN COMPLIANCE WITH ALL TERMS, CONDITIONS & EQUIP. SPECIFIED IN THE TITLE V PERMIT AT ALLTIMES. SPECIFICALLY: - SECTION D CONDITION H23.2 OF FACILITY PERMIT TO OPERATE - FAILURE TO COMPLY WITH THE APPLICABLE REQUIREMENTS OF RULE 1469.1.
TROJAN CLEANERS & LAUNDRY	147816	NC	E32923	10/2/2018	10/2/2018	206, 1102	maintain daily inspection records of dry-cleaning machine; maintain records of pounds per load; maintain a copy of safety data sheet of dry-cleaning solvent; post Permit to Operate F84322 on premises

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
TURNER	187171	NC	E42891	4/5/2018	4/5/2018	109, 403, PERP 2458, TITLE13ARTICLE5S	R109 Provide VOC Usage logs and SDS for all coatings, R403(d)(2) minimize fugitive dust using BACM, R403(d)(4) minimize track-out using BACM, PERP 2453(f) update registration cert and keep operating conditions w/ unit, PERP 2458(a) records
TURNER	187171	NOV	P68052	4/13/2018	4/13/2018	403	R403(d)(4) Failure to prevent track-out of 25 feet or more in cumulative length from the point of origin from an active operation. 604.9 feet measured.
TURNER	187171	NOV	P65062	8/3/2018	8/3/2018	403, 403(D)(2)	Conduct active operations without best available control measures to minimize fugitive dust and failure to prevent track_out of 25 feet or more in cumulative length from the point of origin from an active operation.
TURNER	187171	NOV	P68060	8/28/2018	8/28/2018	403, 403(D)(2)	403(d)(2) Conducting active operations without properly utilizing the applicable BACM found in Table 1 of Rule 403 to minimize fugitive dust. 403(d)(4) Failure to prevent tract-out of 25 feet or more in cumulative length from the point of origin (961 ft)
TURNER	187171	NOV	P68062	11/2/2018	11/2/2018	403, 403(D)(2)	403(d)(2) Conducting active operations w/o properly utilizing the applicable BACM found in Table 1 of Rule 403 to minimize fugitive dust emissions. 403(d)(4) Failure to prevent track-out of 25 ft or more in cumulative length from the pt of origin. 1086 ft

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
TURNER	187171	NOV	P69590	2/19/2020	2/5/2020	403, 403(D)(2)	visible fugitive dust emission crossing property lines. conducting active operations without properly utilizing the applicable best available control measures in table 1 of rule 403 to minimize dust
TURNER	187171	NOV	P69595	4/28/2020	4/23/2020	403, 403(D)(1)	Fugitive dust crossing property lines. Trackout extending more than 25ft from an exit. Failure to implement BACM to prevent fugitive dust.
U S CLEANERS	111454	NC	E48177	6/3/2019	6/3/2019	42303	Provide the following records: laundry poundage, PERC additions, inspections, and most recent cooling coil/gasket invoice.
ULTRA BODY SHOP INC	151440	NC	E45979	3/13/2019	3/13/2019	42303	Provide to the District VOC Record Keeping of all coatings applied from January 1st, 2019 to present.
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	NOV	P73561	6/24/2021	6/16/2021	3002(C)(1)	
UNIV OF SO CAL (EIS & NSR USE ONLY)	800265	NOV	P73564	7/2/2021	6/16/2021	3002	Violating permit conditions.
UNIVERSAL MOLDING CO.	35565	NC	E45212	9/12/2018	9/12/2018	203(B)	Submit permit application for modification to permitted anodizing line F75342 to include any new changes (tanks).
UNIVERSAL MOLDING COMPANY	91591	NC	E52589	3/4/2021	3/4/2021	42303	Provide yerly calibration record for burn_off oven
UNIVERSAL MOLDING COMPANY	145216	NC	E52590	3/5/2021	3/5/2021	42303	Provide natural gas usage records for both permitted furnaces
UNIVERSAL MOLDING COMPANY	145216	NC	E52593	5/26/2021	5/26/2021	203	Maintain monthly gas records as required by permit conditions
US GASOLINE #2 INC	180478	NC	E45443	10/5/2018	10/5/2018	206, 461	Ensure Permit #N20046 is posted, Repair/replace fill cap on 91 tank that is missing the gasket. Replace torn boots on nozzles 2, 5, 6, and 8. Maintain current weekly inspections. Ensure ISD hose

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							mapping is correct (currently missing fueling point 1
US GASOLINE #2 INC	180478	NC	E46345	1/9/2019	1/9/2019	461	Provide records of periodic compliance inspection conducted in 2018. Provide test results for most recent vapor recovery test. Conduct Methodology 6 dynamic backpressure test on next scheduled test and schedule as a Performance test.
US GASOLINE #2 INC	180478	NOV	P67686	1/9/2019	10/13/2018	461, 461(C)(2)(B)	Failure to maintain Phase II system properly - incorrect Veeder-Root ISD hose mapping. Failure to maintain vapor recovery daily maintenance inspections.
US GASOLINE #2 INC	180478	NOV	P67694	3/7/2019	3/2/2019	461(C)(3)(Q)	Failure to submit 2018 monthly gasoline throughput data by March 1st, 2019 deadline.

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
V&M AEROSPACE LLC	180918	NC	E40450	3/30/2018	3/15/2018	1147, 203, 203 (B)	DETERMINE AND PROVIDE MAXIMUM HEAT INPUT CAPACITY IN BTU PER HOUR, OF THE GAS OVEN ON SITE. SUBMIT A PERMIT APPLICATION TO AQMD FOR SAND BLAST #1. PROVIDE ULPA CERTIFICATIONS OF EFFICIENCY FOR ALL 5 ULPAS. PROVIDE SODIUM HYDROXIDE CONCENTRATION IN CHROME STRIPPING TANK 12 IN PERCENT BY WEIGHT. PROVIDE QUATERLY INSPECTION REPORTS FOR 2018 FOR ALL AIR POLLUTION CONTROL DEVICES. PROVIDE UPDATED OPERATIONS AND MAINTENANCE PLAN. PROVIDE UPDATED MAINTENANCE LOGS. PROVIDE UPDATED WEEKLY HOUSEKEEPING LOGS FOR MARCH 2018 TO THE PRESENT. SUBMIT PERMIT MODIFICATION APPLICATION TO AQMD FOR PERMIT G43328 TO INCLUDE TWO ETCHING TANKS. PERMIT STATES 4 PRESENT. SUBMIT PERMIT INACTIVATION FORM FOR PERMIT G43331. YOU STATED THAT IT IS NOT ON SITE ANYMORE.
V&M AEROSPACE LLC	180918	NOV	P63091	3/30/2018	7/3/2017	203	OPERATING HARD CHROME PLATING TANKS #1 AND #3 CONTRARY TO PERMIT CONDITIONS: A) TANK #1 EXCEEDED ANNUAL AMPERE_HOUR LIMIT OF 11,599,700 IN 2017. B) TANK #3 EXCEEDED ANNUAL AMPERE_HOUR LIMIT OF 9,942,600 IN 2017

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
V&M AEROSPACE LLC	180918	NC	E46775	8/14/2019	8/13/2019	203 (B), 1469	Pursuant to Rule 203 (b), maintain the chromic acid concentration of all hard chrome plating tanks below permit condition 6 limits. Pursuant to Rule 203 (b), implement maintenance activities to ensure that air pollution control devices operate within the static pressure differential limits of the permits. Pursuant to Rule 1469 (n)(4), measure slot velocities.
V&M AEROSPACE LLC	180918	NC	E50242	3/24/2020	3/24/2020	42303	Provide the following information: - Photos within a week of the date of issuance of: - All chrome tanks and their control devices - All rectifier totalizer readings - All control device pressure drop readings - All chrome tank temperature readings (Ensure that it is clear which equipment each photo is for) - Waste manifest for the filters replaced on 3/14/20 and 3/15/20. - Performance certification for the ULPA filters.
VALERO DLR JAMES LEE, JAMES SERVICE CTR	18796	NOV	P71809	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 0190 0000 6374 8292
VALERO DLR JAMES LEE, JAMES SERVICE CTR	18796	NC	E48770	7/5/2019	7/5/2019	461	Provide 2019 Daily, Healy Weekly & Healy Quarterly Maintenance inspection records and maintain

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
VALERO DLR, FLORENTINO C APELES	58990	NC	E45351	11/27/2018	11/27/2018	461	Contact technician to diagnose and repair s5/PMC sensor fault alarm/time changes for Veeder Root (see Inventory and November printouts); Facility is on a February test schedule. testing done early in December 2017 - schedule next reverification in Feb
VALERO, THREE FOUR INC.	147549	NC	E43146	4/5/2018	4/5/2018	461	RULE 461 (C)(2)(B) _ HAVE A CERTIFIED TECHNICIAN CHECK THE ISD SYSTEM TO SEE WHY THE PRESSURE SENSOR READING MAX IS AT (_5) AND MIN IS AT (+5)
VALERO, THREE FOUR INC.	147549	NC	E45359	12/27/2018	12/27/2018	461	Repair or replace vapor cap at South UST - handle is broken
VALERO, THREE FOUR INC.	147549	NOV	P68412	12/27/2018	12/27/2018	461, 41960	Failure to maintain gasoline dispensing facility system in good working order in accordance with the manufacturer's specification of the certified system; Operating a gasoline dispensing system contrary to CARB Executive Order, Including the IOM -
VALERO, THREE FOUR INC.	147549	NOV	P76915	12/12/2019	3/2/2019	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7019 1120 0000 2838 4264
VALERO, THREE FOUR INC.	147549	NC	E50821	8/18/2020	8/18/2020	461	Facility is on a January / July test schedule, however July 2020 test was conducted late in August 2020 _ conduct next reverification test in January 2021 to remain on schedule.
VEER CRENSHAW PARTNERS INC	189132	NC	E46442	1/24/2019	1/24/2019	461	Repair or replace nozzle at fueling point # 1 due to sticky interlock; Missing records / Operation and Maintenance Manual -

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							including (1) Vapor Recovery test records, (2) ISD
VERMONT FUEL, INC.	161396	NOV	P72410	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7018 0680 0001 2738 6894
VERNON FUEL DIS INC	118622	NC	E47260	5/24/2019	5/24/2019	461	Provide missing Dynamic Back Pressure test results TP201.4 Method 4; if not missing, perform at your next Vapor Recovery Test in October 2019 - Have tester schedule as a Performance test - to be witnessed by AQMD
VERSA PRODUCTS, INC.	149352	NC	E49772	3/4/2021	3/4/2021	42303	Provide 1) P#G15313 "dry oven" gas bill for 2019-2020, 2) P#G15314 "Booth #1" summary of powder usage per month 3) "wash tank" BTU rating for the two burners, 3) "Warehouse #2 Baghouse" filter area and bag count, 4) "Curing oven #1 & #2" burner BTU Rating
VERSA PRODUCTS, INC.	149352	NC	E53598	7/28/2021	3/4/2021	203 (A), 203 (B), 1147	1) powder booth #1: begin monthly summary of powder usage, 2) Powder booth #2: submit a P/O app or decomission, 3) Oven #3: install a dedicated gas meter or source test, Submit a P/O for 4) oven #2, 5) three laser cutters, 6) three dust collectors
VICTORY POWDER COATING & SANDBLASTING IN	178026	NC	E47098	10/4/2019	10/4/2019	203	_ Keep and provide updated powder coating records, _ Make sure manometers for powder coating spray booth are in good operating condition (and within permit limits of 2.5 in WC and 1.5 in WC)

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
VICTORY POWDER COATING & SANDBLASTING IN	178026	NC	E50567	12/31/2019	12/31/2019	203	Make sure all permitted equipment are in good operating condition and do not operate equipment until repairs are made to prevent any fugitive dust from escaping into the atmosphere
VICTORY POWDER COATING & SANDBLASTING IN	178026	NOV	P73801	5/5/2020	4/24/2020	203 (B), 1155	Failure to maintain dust collector equipment in good operating condition; allowing visible emissions from a permitted baghouse (South Coast AQMD Permit# G32569)
VICTORY POWDER COATING & SANDBLASTING IN	178026	NC	E51014	5/6/2020	5/5/2020	203 (B), 1155	Submit permit modification for the cyclone to the dust collector permit (G32569); keep and maintain visible emissions observations and records once a week.
VICTORY POWDER COATING & SANDBLASTING IN	178026	NOV	P65284	8/7/2020	7/29/2020	203 (B), 1155	failure to maintain dust colllector equipment in good operating condition; allowing visible emissions from a permited baghouse
VICTORY POWDER COATING & SANDBLASTING IN	178026	NOV	P65285	9/4/2020	9/4/2020	203 (B), 1155	failure to maintain dust collector equipment in good operating condition; alllowing visible emissions from a permitted baghouse (South Coast AQMD Permit to Operate #G32569)
WALSH SHEA CORRIDOR CONSTRUCTORS	186308	NC	E46871	4/10/2019	4/10/2019	PERP 2456, PERP 2458	apply green PERP placard and orange CARB sticker to generator. Provide a copy of CARB registration certificate and post on generator. Provide a copy of usage log of generator and post a copy on generator
WALSH/SHEA CORRIDOR CONSTRUCTORS	181728	NC	E42889	3/30/2018	3/30/2018	203 (A), 403, 403 (D)(2)	203(a) Do not operate Putzmeister 131HP Concrete Pump without a valid Various Locations Permit or a PERP registration, 403(d)(2) keep fugitive dust from leaving the property site by implementing BACM

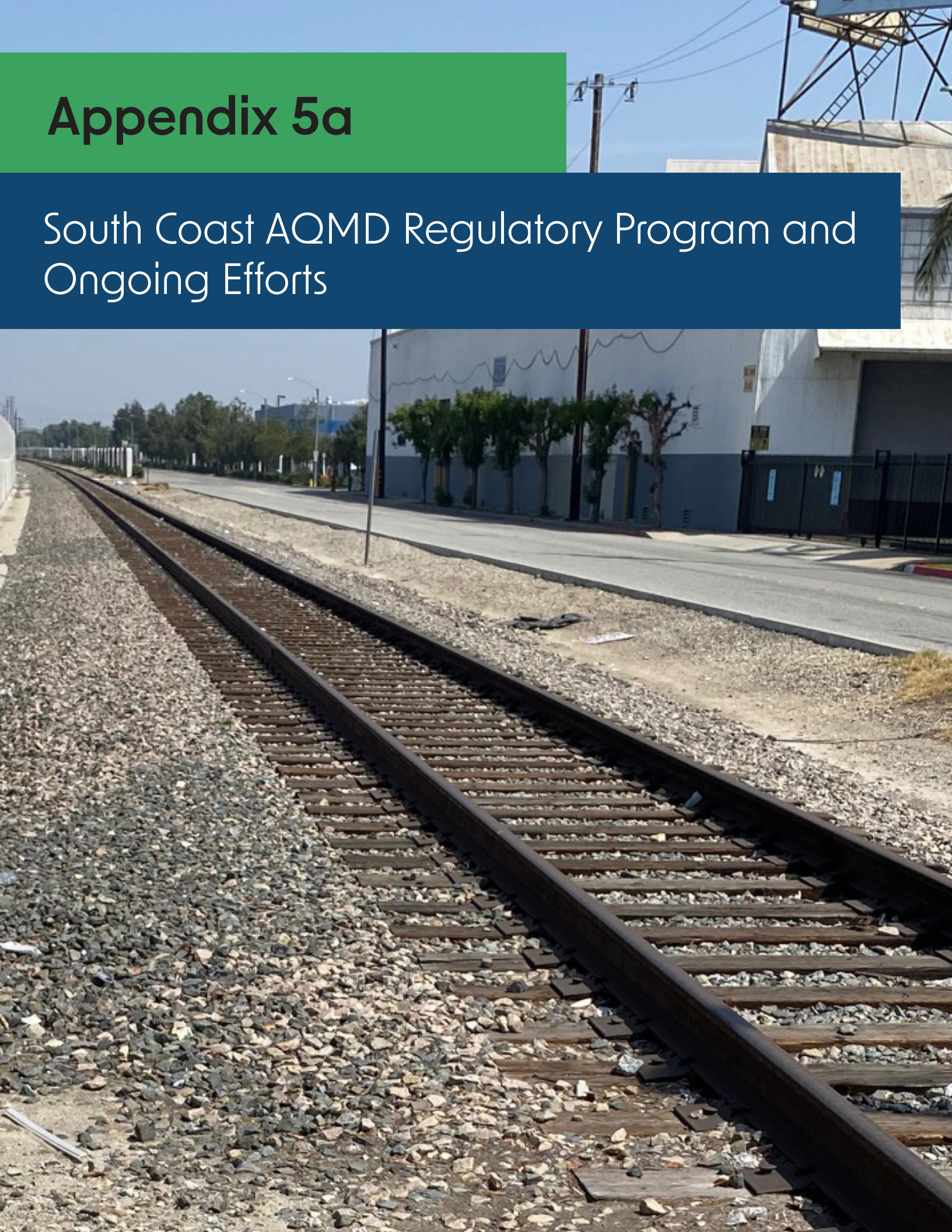
Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
							found in Table 1, 403(d)(4) prevent track-out of x>25ft
WALSH/SHEA CORRIDOR CONSTRUCTORS	181728	NC	E42900	6/14/2018	6/8/2018	403, 403(D)(1), 403(D)(2)	R403(d)(2) No active operations without utilizing applicable BACM to minimize fugitive dust, R403(d)(1) No person shall cause or allow emissions of fugitive dust from operations or storage piles, R403(d)(4) No track out
WASTE RESOURCE RECOVERY, INC.	154248	NOV	P69803	4/18/2019	4/17/2019	201, 203	I OBSERVED PARTIAL INSTALLATION OF EQUIPMENTS FOR THE SOLID WASTE ORGANICS PROCESSING SYSTEM LOCATED IN THE MATERIAL RECOVERY BUILDING WITHOUT A PERMIT TO CONSTRUCT. I OBSERVED THE TUBULAR AUGER ROTATING INSIDE THE STEAM DRYER WHICH WAS BEING POWERED BY THE PORTABLE GENERATOR. THIS EQUIPMENT DOES NOT HAVE A PERMIT TO OPERATE.
WESTERN AUTO BODY & PAINT REPAIR	162773	NOV	P69553	5/1/2019	5/1/2019	109, 203 (A)	failure to maintain daily records of operational use of VOC paint, operating a spray booth without a valid permit to operate
WESTERN FUEL GROUP, INC.	180431	NC	E45445	10/5/2018	10/5/2018	461	Provide copy of Methodology 4 and 6 Dynamic Backpressure test results or conduct those tests on next scheduled vapor recovery test and schedule it as a Performance test

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
WINALL OIL CO #2	33824	NOV	P71840	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 0190 0000 6374 8605
WINALL OIL CO #9	27306	NOV	P71818	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 0190 0000 6374 8384
WINALL OIL CO #9	27306	NOV	P68432	4/30/2019	12/1/2017	461	Failure to conduct reverification tests semiannually - missed test in November 2018; Failure to conduct reverification tests during the same months (May and November) each year - late tests for November 2017 and November 2018
WISE LIVING	167612	NC	E49747	3/6/2020	3/6/2020	109, 203 (A), 1155	begin maintaining a spray log of VOC coatings & solvents used. Apply for a permit to operate or decommission paint spray booth and oven. Properly seal discharge of dust collectors or use dust suppresant
WORLD OIL CO #1	1261	NC	E44492	6/15/2018	6/15/2018	461	Replace torn boots on nozzle #'s 8 and 10. Ensure breakaway on pump #1 has CARB certified pin in place (sheared off on the outside). Provide Rule 461 daily training certificate. Provide test records of Methodology 4 and 6 vapor tests.
YJC IMPERIAL GAS STATION, INC.	184438	NC	E50812	2/19/2020	2/19/2020	461	Replace broken vapor cap (orange drybeak) at west tank; remove debris/foreign materials from all gasoline spill buckets at tanks; correct phone number at all AQMD/Clean Air signs to 800_242_4020

Facility Name	Facility ID	Notice Type	Notice Number	Notice Issue Date	Violation Date	Rule Number	Violation Description
YWIS CORP	108242	NOV	P71921	12/11/2018	3/2/2018	461(c)(3)(Q)	Failing to submit the facility's monthly gasoline throughput data for the previous calendar year on or before March 1, 2018. Certified Mail Tracking #7017 3380 0000 7803 8281
Z & R OIL COMPANY	140519	NC	E43135	3/15/2018	3/15/2018	461	RULE 461 (E)(6)(D) _ PROVIDE THE 2018 THROUGHPUT RECORDS (C)(2)(B) _ PROVIDE THE 2018 DAILY & WEEKLY INSP. RECORDS, REPLACE TORN FACEPLATE ON #1 & #8, FIX COMMUNICATIONS ISSUE BETWEEN INSITE 360 & VEEDER ROOT (C)(3)(G) _ POST AQMD DECALS ON #2,4,6,8, 9
Z & R OIL COMPANY	140519	NOV	P68160	7/12/2018	6/30/2018	201, 203 (A)	RULE 201 _ FAILURE TO OBTAIN A PERMIT TO CONSTRUCT PRIOR TO CONDUCTING A MAJOR MODIFICATION TO THE VAPOR RECOVERY SYSTEM _ FACILITY INSTALLED NEW DISPENSERS; RULE 203(a) - OPERATING WITHOUT A VALID PERMIT
Z & R OIL COMPANY	140519	NC	E47249	5/3/2019	5/3/2019	461	Contact Veeder-Root technician to: (1) correct date and time (2) Ensure ISD is collecting appropriate dada for certified system
Z & R OIL COMPANY	140519	NC	E48780	8/27/2019	8/27/2019	461	Contact technician to diagnose and repair Veeder_Root ISD communication with INSITE 360 program
ZIBA INVESTMENT CORP	133145	NC	E42323	3/20/2018	3/20/2018	461	Install missing AQMD Signage at all dispensers; Provide most current Daily Maintenance Inspection records; Provide and maintain current Repair/ISD Alarm logs

Appendix 5a

South Coast AQMD Regulatory Program and Ongoing Efforts



Introduction

One of the requirements in California Air Resources Board's (CARB's) Community Air Protection Program Blueprint[1] includes providing additional details relating to regulatory strategies impacting the designated community, such as an air district's proposed or proposed amended rules and CARB's mobile source measures. Chapter 5a: Introduction to Actions to Reduce Community Air Pollution summarizes the community air quality priorities, authority of governmental agencies and their ongoing efforts, opportunities for action, and emissions reduction targets. This appendix further discusses ongoing efforts by the South Coast Air Quality Management District (South Coast AQMD).

South Coast Air Quality Management District Regulatory Program

Overview

Under the federal Clean Air Act, the United States Environmental Protection Agency (U.S. EPA) establishes health-based air quality standards that all states must achieve. The California Clean Air Act also establishes requirements for cities and counties to meet. South Coast AQMD was created by the state legislature to facilitate compliance with the federal Clean Air Act and to implement the state air quality program. As such, South Coast AQMD develops rules and regulations designed to achieve these public health standards.

Rules and Regulations

South Coast AQMD has a robust regulatory program that addresses criteria pollutants, toxic air contaminants (TACs), and prohibitory rules. At South Coast AQMD, a regulation is composed of rules, each of which deals with a specific topic within that regulation. For example, Regulation IV includes prohibitory rules, Regulation XI includes source-specific rules, Regulation XIV includes toxic air contaminants (TACs) and other non-criteria pollutant source-specific rules. There are also rules under Regulation XIII – New Source Review that establish requirements for new and modified sources. **Table A5a-1** provides a list of the South Coast AQMD's regulations.

[1] CARB, Community Air Protection Program Blueprint, https://ww2.arb.ca.gov/capp-blueprint

Table A5a-1: South Coast AQMD's Regulations

Regulation	Content	Rules
I.	General Provision	Rules 101 - 118.1
II.	Permits	Rules 201 - 223
III.	Fees	Rules 301 - 320
IV.	Prohibitions	Rules 401 – 481 and Addendum
V.	Procedure Before the Hearing Board	Rules 501 – 518.2
VI.	(Repealed January 1, 1976)	
VII.	Emergencies	Rules 701 - 715
VIII.	Orders for Abatement	Rules 801 - 817
IX.	Standards of Performance for New Stationary Sources (NSPS)	Regulation IX
X.	National Emission Standards for Hazardous Air Pollutants (NESHAPS)	Regulation X
XI.	Source Specific Standards	Rules 1100 - 1196
XII.	Rules of Practice and Procedure Health and Safety Code Section 40509	Rules 1201 - 1231
XIII.	New Source Review	Rules 1300 - 1325
XIV.	Toxics and Other Non-Criteria Pollutants	Rules 1401 - 1480
XV.	Trip Reduction / Indirect Source	Rules 1501 - 1504
XVI.	Mobile Source Offset Programs	Rules 1605 - 1634
XVII.	Prevention of Significant Deterioration (PSD)	Rules 1701 - 1714 and Appendix
XVIII.	Reserved	
XIX.	Federal Conformity Regulations	Rules 1901 - 1902
XX.	Regional Clean Air Incentives Market (RECLAIM)	Rules 2000 - 2020
XXI.	Registration of Portable Equipment	Rule 2100
XXII.	Mobile Source Emissions Mitigation Programs	Rule 2202
XXIII.	Facility Based Mobile Source Measures	Rule 2305
XXIV.	In-Use Mobile Source Emission Reduction Programs	Rule 2449
XXV.	Intercredit Trading	Rules 2501 - 2507
XXVII.	Climate Change	Rules 2700 - 2702
XXX.	Title V Permits	Rules 3000 - 3008
XXXI.	Acid Rain Permit Program	Subpart A - I
XXXV.	Railroads and Railroad Operations	Rules 3501 - 3503

The following summarizes key South Coast AQMD rules and regulations.

Regulation IV – Prohibitions

Regulation IV includes over 50 rules that address a wide variety of prohibitory rules for nuisances, dust, sulfur content in fuels, circumvention, breakdowns, and equipment startups and shutdowns. One of the most notable rules is Rule 402 – Nuisance, which addresses public nuisances. Rule 402 prohibits a person from discharging from any source such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Regulation XI – Source Specific Standards

Regulation XI includes over 100 rules that establish emission standards for a wide variety of equipment and industry categories that are generally designed to reduced criteria pollutants. Although Regulation XI rules cover particulate matter (PM10) and sulfur oxides (SOx) emissions, many of the rules address nitrogen oxides (NOx) and volatile organic compound (VOC) emissions, as these two pollutants are ozone precursors, and the Basin is in extreme non-attainment with the federal ozone air quality standards. Most Regulation XI VOC rules establish emission standards for coatings and solvents and liquids with VOC emissions. Most Regulation XI rules regulating NOx emissions focus on combustion equipment such as boilers, heaters, furnaces, turbines, and engines. The largest NOx-emitting stationary sources regulated by the South Coast AQMD are in the REgional CLean Air Incentives Market (RECLAIM) facilities (e.g., refineries, power plants, industrial facilities).

Regulation XX – REgional CLean Air Incentives Market

The RECLAIM program[2] is a market-based approach to achieve emission reductions from facilities for NOx and SOx in the aggregate. Facilities in the RECLAIM program are those that emit NOx or SOx greater than four tons per year. RECLAIM facilities that operate under the California Greenhouse Gas Cap-and-Trade program are subject to the requirements of Assembly Bill 617 (AB 617).

An analysis of the RECLAIM program has shown that the ability to achieve emission reductions using a market-based approach has diminished. Therefore, on March 3, 2017, the South Coast AQMD Governing Board directed South Coast AQMD to initiate the RECLAIM program to transition[3] to a command-and-control regulatory structure.[4] AB 617 accelerated South Coast AQMD's efforts by requiring that air districts establish emission standards that are representative of Best Available Retrofit Control Technology (BARCT) and establish implementation schedules

[2] South Coast AQMD, RECLAIM, http://www.aqmd.gov/home/programs/business/business-detail?title=reclaim
[3] South Coast AQMD, RECLAIM Transition, http://www.aqmd.gov/home/rules-compliance/reclaim-transition
[4] Command-and-control regulatory structure is a direct regulation with specified emissions limits as opposed to the market-based approach of RECLAIM.

no later than January 1, 2019, and that BARCT requirements be implemented no later than December 31, 2023, for facilities in the California Greenhouse Gas Cap-and-Trade program.

In order to transition a facility out of RECLAIM, the facility must either have all equipment meet the BARCT emission limit or be subject to a command-and-control rule that establishes BARCT emissions limits for their equipment along with implementation requirements. South Coast AQMD analyzed all NOx emitting equipment at NOx RECLAIM facilities, and identified the following rules that are required to be adopted or amended: 1109.1,[5] 1110.2,[6] 1117,[7] 1118.1,[8] 1134,[9] 1135,[10] 1146,[11] 1146.1,[12] 1146.2,[13,14] 1147,[15,16] 1147.1,[17] 1147.2,[18] 1153.1,[19,20] and

[5] South Coast AQMD, Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1109-1.pdf

[6] South Coast AQMD, Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf

[7] South Coast AQMD Rule 1117 – Emissions from Container Glass Melting and Sodium Silicate Furnaces, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1117.pdf

[8] South Coast AQMD, Rule 1118.1 – Control of Emissions from Non-Refinery Flares, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/R1118-1.pdf?sfvrsn=9

[9] South Coast AQMD, Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1134.pdf

[10] South Coast AQMD, Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1135.pdf

[11] South Coast AQMD, Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146.pdf

[12] South Coast AQMD, Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf

[13] South Coast AQMD, Rule 1146.2 – Control of Oxides of Nitrogen from Large Water Heaters, Small Boilers, and Process Heaters, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf?sfvrsn=17

[14] South Coast AQMD, Proposed Amended Rule 1146.2, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1146-2

[15] South Coast AQMD, Rule 1147 – NOx Reductions from Miscellaneous Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1147.pdf

[16] South Coast AQMD, Proposed Amended Rule 1147, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1147-and-rule-1100

[17] South Coast AQMD, Rule 1147.1 – NOx Reductions from Aggregate Dryers, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1147-1.pdf

[18] South Coast AQMD, Proposed Rule 1147.2 – NOx Reductions from Metal Melting and Heating Furnaces, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1147-2--rule-1147-and-rule-1100

[19] South Coast AQMD, Rule 1153.1 – Emissions of Oxides of Nitrogen from Commercial Food Ovens , https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1153-1-emissions-of-oxides-of-nitrogen-from-commercial-food-ovens.pdf?sfvrsn=2

[20] South Coast AQMD, Proposed Amended Rule 1153.1, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1153-1

1159.1.[21] Appendix 2a: Community Profile lists the RECLAIM facilities that are located within the SLA community boundary.

Non-RECLAIM facilities will continue to be subject to existing South Coast AQMD's command-and-control regulatory structure. Although, as a result of the BARCT assessment conducted for the RECLAIM transition, some equipment at non-RECLAIM facilities will be required to meet updated NOx BARCT emission limits.

Regulation XIV – Toxics and Other Non-Criteria Pollutants

South Coast AQMD also has a robust and comprehensive air toxics regulatory program that consists of rules to address new and modified toxic sources (Rule 1401[22] and Rule 1401.1[23]), existing toxic sources (Rule 1402[24]), and source-specific toxic rules that address a wide variety of equipment categories, use of certain TACs, or industry categories. Rules 1401, 1401.1, and 1402 evaluate nearly 260 TACs for existing, new, modified, or relocated sources. In the past decade, more than 80 TACs have been added to those rules or have had their risk values amended. South Coast AQMD's air toxics regulatory program includes over 15 source-specific and/or industry-specific rules[25] regulating specific equipment categories or industries such as chrome plating, asbestos remediation, lead-acid battery recycling, perchloroethylene dry cleaners, metal melting facilities, and diesel internal combustion engines. South Coast AQMD's air toxics regulatory program for source-specific categories is as at least stringent as, or more stringent than, state Airborne Toxic Control Measures (ATCMs) and federal National Emission Standards for Hazardous Air Pollutants (NESHAPs). Over the past few decades, implementation of South Coast AQMD's air toxics regulatory program has resulted in significant health risk reductions by businesses throughout the South Coast Air Basin (Basin) from a variety of sources.

Rule Development

Knowledge about air pollution is constantly growing, necessitating these rules and regulations to be dynamic and constantly changing. Rules needed to bring the region into attainment with state and federal air quality standards are based on control measures identified in the Air Quality Management Plan (AQMP) and is a combination of the following:

1. New rules to address regulatory gaps or issues that South Coast AQMD became aware of; and

[21] South Coast AQMD, Proposed Rule 1159.1 – Control of NOx Emissions from Nitric Acid Tanks, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1159-1
[22] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[23] South Coast AQMD, Rule 1401.1 – Requirements for New and Relocated Facilities Near Schools, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401-1.pdf
[24] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf
[25] South Coast AQMD, Regulation XIV – Toxics and Other Non-Criteria Pollutants, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiv

2. Amendments to streamline and strengthen existing rules.

Generally, the rule development process involves extensive information gathering and research into available technologies, coordination with all stakeholders (e.g., industry groups, impacted facilities, environmental and community groups), and analysis of the economic impact of each proposed rule or rule amendment. For every rule development, South Coast AQMD provides an opportunity for public input at working group meetings where the public can voice suggestions and concerns about the impact of a proposed rule at public workshops and consultations meetings. A public hearing is held where the Governing Board hears public comments and votes on the proposed or amended rule(s). For additional details on proposed or proposed amended rules please refer to the South Coast AQMD's website.

For rulemakings that establish an emission standard to meet BARCT, South Coast AQMD conducts a BARCT analysis. The California Health and Safety Code, Section 40406 defines BARCT as "an emission limitation that is based on the maximum degree of reduction achievable, taking into account environmental, energy, and economic impacts by each class or category of source." BARCT is reassessed periodically and is updated as technology advances. The BARCT analysis process includes a technology assessment, which includes four main elements:

1. Assessing South Coast AQMD regulatory requirements;
2. Assessing emission limits of existing units;
3. Assessing emission limits under other regulatory requirements; and
4. Assessing pollution control technologies. Additionally, the BARCT analysis process includes cost-effectiveness and incremental cost-effectiveness analyses.

Annual Emissions Reporting

South Coast AQMD established the Annual Emissions Reporting (AER)[26] program to require certain facilities to file an annual emissions report and pay annual fees "for all actual source emissions including, but not limited to, permitted, unpermitted, unregulated and fugitive emissions," if meeting applicability as specified in Rule 301.[27] Facilities required to file an annual emissions report include the following:

- Every facility that receives an Annual Emissions Reporting notification from South Coast AQMD, regardless of the estimated annual emissions levels, even if no fees are due, to update the facility's emissions records.
- Every facility that has estimated annual emissions of four or more tons of either SOx, VOCs, NOx, specific organics (SPOG), or particulate matter PM), or emissions of 100 tons per year or more of carbon monoxide (CO).

[26] South Coast AQMD, Annual Emissions Reporting program, https://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting

[27] South Coast AQMD, Rule 301 – Permitting and Associated Fees, http://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-301.pdf

- Every facility subject to the Assembly Bill 2588 (AB 2588) Program for reporting quadrennial updates to its toxics emissions inventory.[28]
- Every facility subject to CARB's Criteria and Toxics Reporting Regulation.

South Coast Air Quality Management District Ongoing Efforts

Assembly Bill 2588 Program

In 1987, the California legislature adopted the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (commonly known as AB 2588[29]).[30] The goals of the AB 2588 program are to provide the public with information regarding potential health effects from TACs emitted from existing permitted facilities, and to develop plans to reduce associated risks.

The AB 2588 program is implemented at South Coast AQMD through Rule 1402. There are seven important components to the AB 2588 program:

1. Emissions Reporting;
2. Prioritization;
3. Health Risk Assessment (HRA);
4. Public Notice;
5. Risk Reduction;
6. Industry-Wide Sources; and
7. Fees.

Facilities are required to submit HRAs based upon the toxicity and volume of TACs released within proximity to potential receptors (e.g., hospitals, residences, work sites). A maximum individual cancer risk (MICR) exceeding 10 in one million or non-cancer total acute or chronic hazard index (HI) of 1, as demonstrated by an HRA,[31] triggers the need for public notice. A MICR of 25 in one million or total acute or chronic HI of 3, as demonstrated by an HRA, triggers the need for risk reduction. Any facility whose facility-wide emission of TACs exceeds a MICR of 100 in one million or total acute or chronic HI of 5 is required to achieve risk reductions within three years from initial risk reduction plan submittal. Appendix 2a: Community Profile shows facilities within the SLA community that are currently in the South Coast AQMD AB 2588 program.

[28] California Health and Safety Code, Section 44344

[29] South Coast AQMD, AB 2588 Air Toxics "Hot Spots" Program, https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588

[30] The South Coast AQMD's AB 2588 Program incorporates the requirements of the state AB 2588 program, as well as additional and/or more stringent requirements.

[31] South Coast AQMD, Health Risk Assessment, http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/health-risk-assessment

California Environmental Quality Act[32]

The California Environmental Quality Act (CEQA) was adopted in 1970 and intended to inform governmental decision-makers and the public about potential environmental effects of a project; identify ways to reduce significant adverse impacts; offer alternatives to the project to avoid significant adverse impacts; and disclose to the public why a project was approved despite significant and unavoidable adverse impacts. CEQA applies to projects undertaken, funded, or requiring an issuance of a permit by a public agency making a discretionary decision. South Coast AQMD has three roles under CEQA:

1. Lead Agency: A CEQA Lead Agency is the public agency with the greatest responsibility for supervising or approving a project. South Coast AQMD is a Lead Agency for its own rule projects and Air Quality Management Plans. Additionally, South Coast AQMD may be the Lead Agency for projects requiring air permits.
2. Responsible Agency: A CEQA Responsible Agency is the public agency other than the Lead Agency which has discretionary approval authority over a portion of a project. South Coast AQMD is a Responsible Agency when another public agency is undertaking a project that requires a South Coast AQMD permit for construction or operation of equipment that either controls or emits air pollutants for a portion of the project; however, South Coast AQMD does not have primary approval authority over the whole of the project.
3. Commenting Agency: A CEQA Commenting Agency is a public agency with "jurisdiction by law" over a particular natural resource but is neither a Lead Agency nor a Responsible Agency. The South Coast AQMD, for example, is the sole and exclusive local agency in the South Coast Air Basin, the Riverside County portion of the Salton Sea Air Basin, and a portion of the Mojave Desert Air Basin with the responsibility for comprehensive air pollution control, and therefore reviews and may provide comments on the air quality analysis in environmental documents prepared by other public agencies serving as CEQA Lead Agencies and submitted to the South Coast AQMD through its Intergovernmental Review program.

The South Coast AQMD is not a Lead Agency for land use projects such as shopping malls, housing tracts, commercial or industrial parks, sports stadiums, etc.; and transportation projects such as roadway improvements or widenings. For these types of projects, the South Coast AQMD has no land use decision or approval authority. If there are questions on these types of land use and transportation projects, it is important for the public to contact the project's CEQA Lead Agency such as the city, county, or state.

Technology Clearinghouse

As a requirement of AB 617, CARB established a statewide Technology Clearinghouse,[33] which is a tool to identify the best technologies for reducing emissions, particularly best available control

[32] South Coast AQMD, CEQA, http://www.aqmd.gov/home/rules-compliance/ceqa
[33] CARB, Technology Clearinghouse, https://ww2.arb.ca.gov/our-work/programs/technology-clearinghouse

technology (BACT), BARCT, and related technologies for the control of toxic air contaminants (T-BACT).

South Coast AQMD's BACT Guidelines[34] establishes the procedures and the BACT requirements for commonly permitted equipment and must be periodically updated. With respect to T-BACT, it is established during the permitting process for new, relocated, or modified permit units that result in an increase in Maximum Individual Cancer Risk (MICR) above a specified threshold.[35]

South Coast AQMD is working with CARB to provide data for the Technology Clearinghouse. Additionally, as required by AB 617 and the Community Air Protection Program Blueprint, air districts will use the Technology Clearinghouse and rule development process to determine emission reduction strategies.

Incentives

Since 2017, the California Legislature has budgeted approximately $704 million to support the AB 617 program through annual incentives aimed to advance lower-emitting technologies, provide new opportunities for stationary source incentives, and support community-identified projects to implement Community Emissions Reduction Programs statewide.[36] CARB distributes incentives for the AB 617 program through Community Air Protection Incentives; South Coast AQMD refers to this as Community Air Protection Program (CAPP) incentives.

CARB works with the California Air Pollution Control Officers Association (CAPCOA) to distribute incentive funds annually to the air districts throughout California for AB 617 designated communities and communities that are under consideration for selection in the AB 617 program. The amount of funding that the State Legislature allocates to AB 617 is determined each year. There is no guarantee to the amount that the state will allocate to AB 617 each year and the amount of funding each air district will receive (which is distributed by CARB). South Coast AQMD, in consultation with the AB 617 designated communities, is responsible for the distribution of incentives amongst the communities. CARB's Community Air Protection Incentives 2019 Guidelines (CAP Guidelines,[37] also known as CAPP Guidelines at South Coast AQMD) identifies projects eligible for incentive funds and requirements for allocating the incentive funds. It is important to note, CAPP incentive funds can only be used for projects or technologies supported by an adopted CERP.

At South Coast AQMD, allocating incentive funds received through the AB 617 program is done through collaboration with all AB 617 designated communities. In the fourth quarter of 2020,

[34] South Coast AQMD, Best Available Control Technology Guidelines, http://www.aqmd.gov/home/permits/bact/guidelines

[35] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1402/par-1401-ph.pdf

[36] CARB, Community Air Protection Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives/about

[37] CARB, Community Air Protection Incentives Guidelines, https://ww2.arb.ca.gov/resources/documents/community-air-protection-incentives-guidelines

South Coast AQMD began working with the five AB 617 designated communities and SLA[38] to discuss distribution of the annual funds received from CARB. The funds were distributed across the five designated communities with consideration given to the CAPP funding awarded to date for each community. For the five designated communities, South Coast AQMD conducted a poll to help the CSC prioritize the top three incentive projects. South Coast AQMD worked with each CSC to determine the distribution of funds for each of the incentive projects selected. At that time, SLA was in the process of CERP development and therefore was not a part of the polling.

For example, in the second quarter of 2020, South Coast AQMD requested about $3 million in CAPP incentive funds from CARB for control devices at chrome plating facilities. Use of these funds would result in emissions reductions above those required by existing regulatory requirements and further decrease exposure to hexavalent chromium in the communities eligible to receive these funds. South Coast AQMD will initiate outreach efforts and work with metal plating facilities in AB 617 communities for the installation of emissions control device projects (e.g., installation of HEPA filters) and conversion projects (i.e., switching from the use of hexavalent chromium to trivalent chromium at chrome plating facilities) that could further reduce hexavalent chromium emissions.

The CAP Incentives 2019 Guidelines allows for incentive funds to be allocated to community identified projects that are supported by an adopted CERP. Therefore, the SLA CSC may have opportunities in the future, if funds are available, to determine how CAPP incentive funds are allocated for projects supported by the CERP. These community identified projects must adhere to CARB's CAPP guidelines.

[38] In October 2021, South Coast AQMD's Governing Board approved that SLA be recommended for the AB 617 program. Therefore, South Coast AQMD anticipated SLA's inclusion in the program and invited community representatives, such as Physicians for Social Responsibility-Los Angeles (PSR-LA), to participate in the Incentives Strategies Public Consultation Meeting. More information regarding this meeting is available at: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/incentive-strategies/presentation-oct15-2020.pdf

Appendix 5b

Mobile Sources

Introduction

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for this Community Emissions Reduction Plan (CERP). One of the concerns raised by the South Los Angeles (SLA) CSC is mobile sources, in particular, emissions from vehicles and equipment at construction and oil and gas sites. This appendix provides additional supporting information for Chapter 5b: Mobile Sources, including an overview of community impacts, emissions, and regulatory efforts. The overview of regulatory efforts includes a summary of regulatory authority, compliance and enforcement, and incentive efforts in addressing emissions from and exposure to mobile sources.

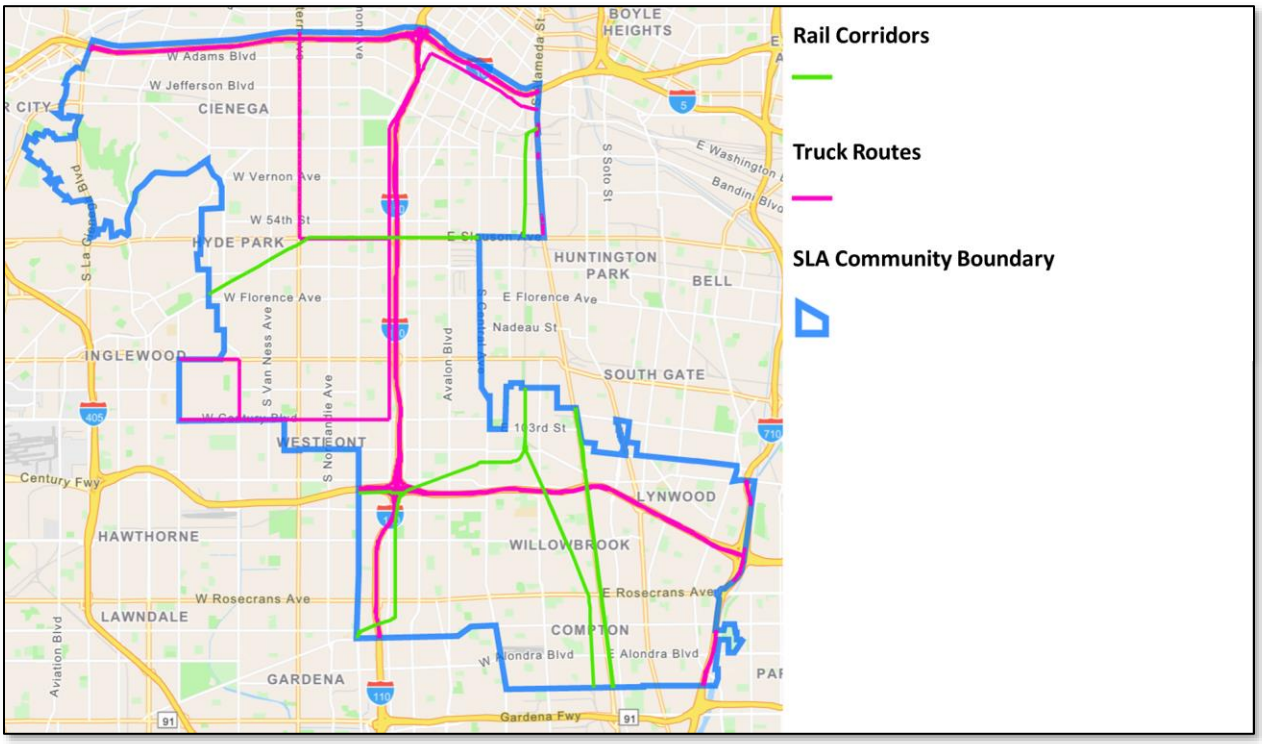
Community Impacts from Mobile Sources

The SLA community is bounded by Interstate 10 (I-10) to the north, Interstate 710 (I-710) and the Alameda Corridor to the east, and State Route 91 (SR-91) to the south, with Interstate 105 (I-105), Interstate 110 (I-110) and the Slauson Corridor crossing through the community. Various types of mobile sources, including light, medium, and heavy-duty vehicles travel along these routes and expose residents to harmful air pollutants. Additionally, the I-710, I-110, and Alameda Corridor are vital transportation routes for goods movement out of the Ports of Los Angeles and Long Beach, which are the busiest container ports in the United States.[1] A daily average of approximately 246,000 vehicles transit along the I-110 and I-105 interchange, 328,000 vehicles transit along the I-10 and I-110 interchange, and 213,000 vehicles transit along the I-710 and I-105 interchange.[2] **Figure A5b-1** provides a map of the rail corridors and truck routes in the SLA Community.

[1] Southern California Association of Governments (SCAG), Industrial Warehousing in the SCAG Region, https://scag.ca.gov/sites/main/files/file-attachments/task2_facilityinventory.pdf?1604268149

[2] Caltrans, Traffic Census Program, https://dot.ca.gov/programs/traffic-operations/census

Figure A5b-1: Truck Routes and Rail Corridors in SLA



Emissions from Mobile Sources

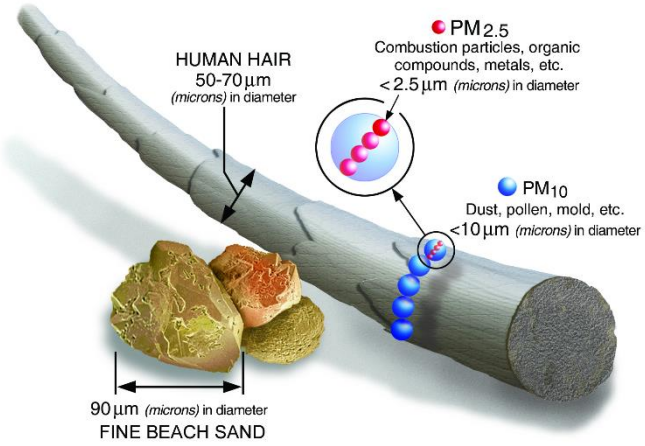
Emissions information for mobile sources in SLA is available in Chapter 2d: Emissions and Source Attribution and Appendix 2d: Source Attribution. This section will highlight emissions from trucks, buses, and locomotives since these sources were highlighted as concerns by the community.

Mobile sources are categorized into two main groups: on-road mobile sources and off-road mobile sources. On-road mobile sources generally includes motor vehicles that travel on roads and highways such as trucks, buses, and cars. Off-road mobile sources include a wide variety of non-road mobile sources such as construction equipment, marine vessels, locomotives, and aircrafts. Fugitive emissions from construction sites are not quantifiable, but construction operations and projects may be subject to the California Air Resources Board (CARB) and South Coast Air Quality Management District (AQMD) rules and regulations. Mobile sources that are fueled with fossil fuels such as gasoline, diesel, or natural gas contribute to emissions of fine particulate matter (PM2.5), particulate matter (PM10), volatile organic compounds (VOCs), and nitrogen oxides (NOx). PM2.5 are particles smaller than 2.5 microns and PM10 are particles smaller than 10 microns, both PM2.5 and PM10 can be inhaled deep into the lungs and cause health problems.[3]**Error! Reference source not found. Figure A5b-2** provides the sizes of PM2.5

[3] CARB, Inhalable Particulate Matter and Health (PM2.5 and PM10), https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health

and PM10 relative to human hair and fine beach sand. VOCs, such as acetone, benzene, and formaldehyde, are a group of gases that contribute to forming ozone (smog). NOx is a family of gases that are highly reactive with other pollutants to form both ozone and PM2.5. Breathing ozone can damage the respiratory system.[4]

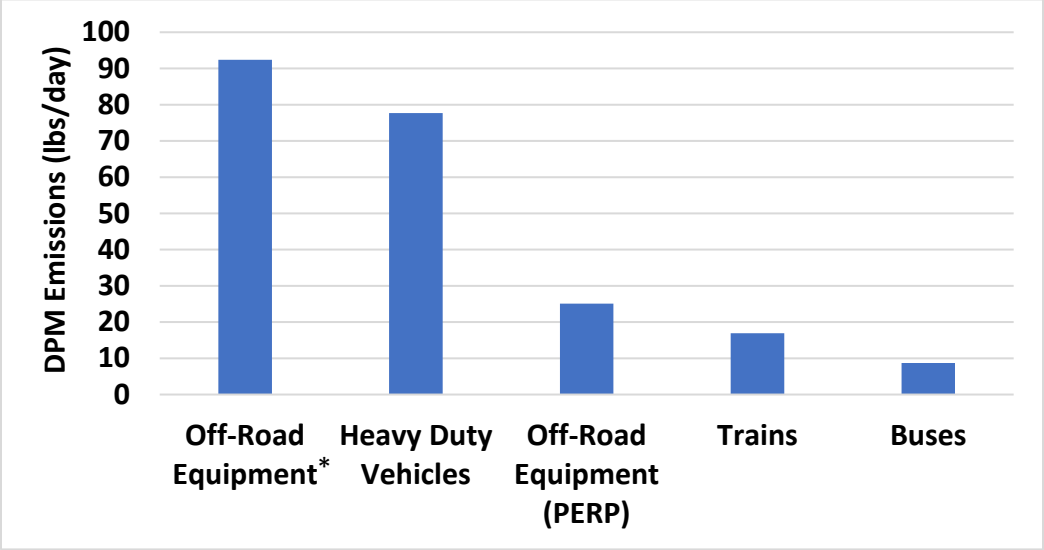
Figure A5b-2: Particulate Matter Size Comparison (PM2.5 and PM10)[5]



Diesel Particulate Matter (DPM) is a class of PM10 which is a toxic air contaminant (TAC) that comes from diesel exhaust and is a top contributor to TAC cancer risks.[6] In 1998, CARB designated diesel particulate from internal combustion engines a carcinogen. **Figure A5b-3** shows the top five mobile sources of DPM in SLA. Based on South Coast AQMD's MATES V study,[7] released in 2021, DPM emissions account for about 67.3 percent of the cancer risks in the South Coast Air Basin (Basin). In 2019, the top five mobile sources of DPM in SLA are shown in **Figure A5b-3**.

[4] South Coast AQMD, Smog and Health – Historical Information, https://www.aqmd.gov/home/research/publications/smog-and-health-historical-info
[5] United States Environmental Protection Agency (U.S. EPA), Particulate Matter (PM) Basics, https://www.epa.gov/pm-pollution/particulate-matter-pm-basics
[6] CARB, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health
[7] South Coast AQMD, MATES V Multiple Air Toxics Exposure Study, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

Figure A5b-3: Top Five Mobile Sources of DPM in SLA[8]



* Off-road equipment includes, but is not limited to, transport refrigeration units (TRUs), cargo handling equipment, and construction equipment.

On-Road Mobile Sources

Based on 2019 emissions data,[8] 40 percent of DPM emissions in SLA are from on-road mobile sources. **Table A5b-1** below provides an overview of emissions from on-road mobile sources in SLA. Within the category of on-road mobile sources, the largest sources of DPM emissions are from medium-heavy and heavy-heavy duty vehicles, which contribute to 45 percent and 35 percent, respectively, as highlighted yellow in **Table A5b-1**. Medium heavy-duty vehicles are trucks that are 14,001 to 33,000 pounds (Figure A5b-4: General Truck Categories**Figure A5b-4**); examples include commercial delivery trucks, beverage trucks, and school buses. Heavy heavy-duty vehicles are trucks over 33,000 pounds **(Figure A5b-4**); examples include freight trucks used to move shipping containers, cement trucks, dump trucks, and city transit buses.Error! Reference source not found.

[8] For more information related to source attribution emissions, please refer to Appendix 2d.

Table A5b-1: Emissions from On-Road Mobile Sources in SLA in 2019[8]

Emission Source	NOx (tpy)*	VOC (tpy)*	PM2.5 (tpy)*	PM10 (tpy)*	DPM (tpy)*
†Light and Medium-Duty Vehicles	838	930	123	290	0.71
†Light Heavy-Duty Vehicles	120	31	4.2	9.1	0.84
Medium Heavy-Duty Vehicles	259	17	12	18	7.5
Heavy-Heavy Duty Vehicles	421	16	8.1	13	5.9
Buses	137	14	5.7	12	1.4
Other	57	142	1.1	2.1	0.32
Total On-Road Mobile Sources	**1,832**	**1,150**	**154**	**344**	**17**

*Emissions were calculated and presented in tons per day for criteria air pollutants and pounds per day for TACs in Chapter 2d and Appendix 2d

† Passenger cars and pickup trucks

Figure A5b-4: General Truck Categories

Category	Definition	Example
Medium Heavy-Duty		
Heavy Heavy-Duty		

Off-Road Mobile Sources

Based on 2019 emissions data,[8] 60 percent of DPM emissions in SLA are from off-road mobile sources which includes off-road equipment (e.g., TRUs, cargo handling equipment, and construction equipment), portable off-road equipment, and locomotives (i.e., trains) (**Figure A5b-5**). **Figure A5b-6** provides examples of portable off-road equipment, such as those that are

registered in CARB's portable equipment registration program (PERP) program.[9] **Table A5b-2** below provides an overview of emissions from off-road mobile sources in SLA.

Figure A5b-5: Examples of Off-Road Equipment

Transport Refrigeration Units

Industrial Forklift

Construction Backhoe

Figure A5b-6: Examples of PERP

Portable Generator

Portable Air Compressor

Portable Pump

Auxilliary Engine for Crane

[9] CARB, Portable Equipment Registration Program (PERP), https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp

Table A5b-2: Emissions from Off-Road Mobile Sources in SLA in 2019[8]

Emissions Source	NOx (tpy)*	VOC (tpy)*	PM2.5 (tpy)*	PM10 (tpy)*	DPM (tpy)*
Trains	123	5.7	2.8	3.1	3.1
Off-Road Recreational Vehicles	0.05	8.9	0.0	0.01	0.0
Off-Road Equipment	574	852	29	34	17
Off-Road Equipment (PERP)	120	11	4.2	4.6	4.6
Other	1.0	143	1.3	1.7	0.0
Total Off-Road Mobile Sources	**818**	**1020**	**37**	**43**	**25**

*Emissions were calculated and presented in tons per day for criteria air pollutants and pounds per day for TACs in Chapter 2d and Appendix 2d

Based on 2019 data,[8] locomotives contribute to 7.5 percent of the total DPM emissions in SLA. The SLA community boundary does not have any railyards,[10] but does include parts of the Alameda Corridor which is an express railway line that parallels Alameda Street and contains three rail tracks used by Burlington Northern and Santa Fe Railway (BNSF) and Union Pacific Railroad Company (UP) to transport goods to and from the Ports of Long Beach and Los Angeles. Approximately 40 trains with a volume of about 13,000 twenty-foot equivalent units (TEUs) travel though the Alameda Corridor daily.[11] Additionally, stations and rail lines for passenger rail services operated by Los Angeles Metro, Amtrak, and Metrolink run through the SLA community.

Regulatory Efforts

Regulatory Authority

The United States Environmental Protection Agency (U.S. EPA) establishes emission limits for mobile sources (on-road and off-road) by regulating both the composition of fuels and tailpipe emissions. The federal Clean Air Act authorizes the state of California (CARB) to set its own separate and stricter-than-federal vehicle emissions regulations to address air pollution; thus, it has primary authority over on-road mobile sources.[12] South Coast AQMD has primary authority over stationary sources with limited authority over mobile sources through indirect sources (fixed facilities that attract mobile sources such as shopping centers, railyards, ports, and warehouses) and certain fleets. Therefore, efforts to address this air quality priority in the SLA community depends on collaboration with agencies that have direct authority over mobile sources, such as U.S. EPA and CARB. South Coast AQMD enforces some CARB mobile source regulations for which

[10] CARB, Railyard Health Risk Assessments and Mitigation Measures, https://ww2.arb.ca.gov/resources/documents/railyard-health-risk-assessments-and-mitigation-measures
[11] Alameda Corridor Transportation Authority, http://www.acta.org/
[12] CARB, History, https://ww2.arb.ca.gov/about/history

there are memorandums of agreements between the agencies or where express authority is given to air districts and written directly into CARB's regulations. South Coast AQMD's authority is limited to addressing indirect mobile sources (facilities that attract mobile sources, e.g., warehouses) through facility-based regulations (e.g., Rule 2305[13]). The sections below describe the regulatory and enforcement efforts from U.S. EPA, CARB, and South Coast AQMD.

U.S. EPA and CARB

On-Road Mobile Sources

In 1998, California designated DPM as a TAC. Since this designation, CARB has developed a suite of regulations, rules, and Airborne Toxic Control Measures (ATCM) to reduce Californians' exposure to DPM emitted from mobile sources (e.g., heavy-duty diesel trucks, buses, and off-road equipment). CARB's existing regulations to reduce DPM emissions from trucks and buses include the Drayage Truck Regulation[14, 15] and the Truck and Bus Regulation.[16, 17] Main components of the Drayage Truck Regulation include registration in CARB's Drayage Truck Registry, recordkeeping and reporting requirements, truck emissions standards, and properly functioning emission control technologies. The Truck and Bus Regulation requires the use of exhaust after treatment, like diesel particulate filters; newer engines that meet lower emissions standards; and limits on idling of diesel-fueled vehicles.

In February 2022, CARB adopted an update to its Transport Refrigeration Unit (TRU) Regulation.[18] CARB defines transport refrigeration units as refrigeration systems designed to refrigerate or heat perishable products that are transported in various containers, including truck vans, semi-truck trailers, shipping containers, and railcars that are powered by diesel internal combustion engines. CARB's TRU Regulation will reduce TAC, criteria air pollutant, and greenhouse gas emissions by transitioning to zero-emission technologies. CARB created informational documents to assist regulated entities (e.g., TRU owners, TRU operators, facilities that support TRU use, etc.) understand compliance requirements and their responsibilities under the TRU regulation.

[13] South Coast AQMD, Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf

[14] CARB, Update on California Actions to Minimize Community Health Impacts from Freight, March 2019, https://www.arb.ca.gov/board/books/2019/032119/19-3-2pres.pdf?_ga=2.79278740.1419761847.1559951314-1545453421.1552083450

[15] CARB, Drayage Trucks at Seaports & Railyards, https://ww2.arb.ca.gov/our-work/programs/drayage-trucks-seaports-and-railyards

[16] CARB, Truck and Bus Regulation Compliance Requirement Overview, https://www.arb.ca.gov/msprog/onrdiesel/documents/fsregsum.pdf?_ga=2.6055219.1262131232.1649211318-53673684.1628617068

[17] CARB, Truck and Bus Regulation, https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation

[18] CARB, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate, https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit

In March 2021,[19] CARB adopted the Advanced Clean Trucks Rule which requires truck manufacturers to transition from producing diesel trucks and vans to zero-emission vehicles beginning with model year 2024. Manufacturers who sell complete vehicles with combustion engines or certified Class 2b-8 chassis would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck and chassis sales would need to be 55 percent of Class 2b-3 truck sales, 75 percent of Class 4-8 straight truck sales, and 40 percent of truck tractor sales. This rule also requires that, on a one-time basis, fleets report information on their vehicles to support future zero-emission fleet rules. **Table A5b-5** below lists key upcoming regulations from U.S. EPA and CARB to reduce emissions from mobile sources. CARB projects that between 2012 and 2030, there will be over a 91 percent reduction in on-road DPM emissions within the Basin from the implementation of CARB's mobile source regulations, with most of the reductions occurring before 2024.[20]

Off-Road Mobile Sources

Examples of Portable Off-Road Equipment (PERP)

PERP makes up the second largest category for off-road mobile sources emissions of VOC, PM2.5, PM10 and DPM (**Table A5b-2**). PERP[21] is a statewide program created by CARB to register portable equipment as an alternative to securing permits from local air districts. PERP registered equipment may operate throughout the state without obtaining permits from any of California's 35 air districts. Portable engines over 50 horsepower and portable equipment that emit PM10 cannot be operated within the Basin without either a South Coast AQMD permit or PERP registration. In some cases, portable equipment may be ineligible for PERP registration, therefore requiring a South Coast AQMD permit. One of the key aspects in determining PERP eligibility is the length of time (residence time) the engine or equipment is at one location. Engines and equipment are deemed portable when their residence time is less than 12 months.[22] If engines or equipment reside at the same location for over 12 months, they require South Coast AQMD permits.

CARB established an ATCM for portable off-road heavy-duty vehicles,[23] which applies to diesel off-road vehicles rated 25 horsepower or greater. Examples of equipment subject to this ATCM include forklifts, construction equipment, and ground support equipment. This ATCM establishes fleet average emission rates for PM and NOx that decline over time; fleet turnover or repowering must keep pace with the declining emission rates in this ATCM.

[19] CARB, Advanced Clean Trucks, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks

[20] CARB, 2020 Community Recommendations Staff Report, https://ww2.arb.ca.gov/sites/default/files/2020-11/2020_Community_Recommendations_Staff_Report_Final.pdf

[21] CARB, Portable Equipment Registration Program (PERP), https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp

[22] South Coast AQMD, Portable Equipment Registration Program (PERP), http://www.aqmd.gov/home/permits/equipment-registration/perp

[23] CARB, Final Regulation Order – ATCM for DPM from Portable Engines Rated at 50 Horsepower or Greater, https://ww2.arb.ca.gov/sites/default/files/2020-03/PERP_ATCM_12.5.18R.pdf

Locomotives

In SLA, locomotives are another category of off-road mobile sources which contribute to significant emissions of NOx, VOC, PM2.5, PM10, and DPM (**Table A5b-2**). Railroad operations are regulated at the federal level, primarily by the Federal Railroad Administration (FRA) and the Surface Transportation Board (STB). Locomotive emissions are primarily regulated by the U.S. EPA. **Table A5b-3**Table A5b-3Table A5b-3 and **Table A5b-4**Table A5b-4 below identifies the emissions standards of NOx, PM, and hydrocarbons (HC) in grams per brake horsepower-hour (g/bhp-hr) required by the U.S. EPA for line-haul and switcher locomotives.[24] Federal authority on locomotives[25] limits certain federal, state, and local regulatory authorities and actions to reduce emissions.

Additional U.S. EPA regulations include mandating the use of ultra-low sulfur diesel fuel[26] and requiring the installation of idle reduction technology on newly manufactured and remanufactured locomotives.[27] Also, under the Clean Air Act, U.S. EPA requires new locomotive engines to be built to meet the cleanest emission standard (currently Tier 4 engines).[28] These regulations are for new or remanufactured locomotive engines and do not require railroad companies to reduce their use of existing older, higher-emitting locomotives or to meet a fleetwide average. Based on the latest data (2020) reported to CARB by BNSF and UP railroads, about 93 percent of all locomotive activity in the Basin does not meet the cleanest emission standard which is Tier 4.[29]

In 2017, CARB petitioned the U.S. EPA to develop a new regulation requiring locomotive engine manufacturers to meet a cleaner Tier 5 emission standard for new locomotive engines, but the U.S. EPA has not acted on this petition. The new emission standards would provide NOx and PM reductions, particularly in the communities that surround railyards. If the U.S. EPA were to develop a Tier 5 emissions standard, it would not result in immediate emissions reductions because locomotive fleet turnover is slow as locomotive engines can last over 30 years.

[24] Code of Federal Regulations, Part 1033 – Control of Emissions from Locomotives, https://www.ecfr.gov/cgi-bin/text-idx?SID=159ba6f126272ea1995c71a43b7af309&mc=true&node=pt40.36.1033&rgn=div5#se40.36.1033_1101

[25] Federal Trade Commission, Interstate Commerce Commission Termination Act of 1995, https://www.ftc.gov/legal-library/browse/statutes/interstate-commerce-commission-termination-act-1995

[26] U.S. EPA, Diesel Fuel Standards and Rulemakings, https://www.epa.gov/diesel-fuel-standards/diesel-fuel-standards-and-rulemakings#nonroad-diesel

[27] U.S. EPA, Control of Emissions from Idling Locomotives, https://nepis.epa.gov/Exe/ZyPdf.cgi?Dockey=P100HP4Q.pdf

[28] U.S. EPA, Regulations for Emissions from Locomotives, https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-emissions-locomotives

[29] CARB, Rail Emission Reduction Agreements, https://ww2.arb.ca.gov/resources/documents/rail-emission-reduction-agreements

Table A5b-3: Federal Line-Haul Locomotive Emission Standards

Emission Tier	Year of Original Manufacture	NOX (g/bhp-hr)	PM (g/bhp-hr)	HC (g/bhp-hr)
Tier 0	1973 – 1992	8.0	0.22	1.00
Tier 1	1993 – 2004	7.4	0.22	0.55
Tier 2	2005 – 2011	5.5	0.10	0.30
Tier 3	2012 – 2014	5.5	0.10	0.30
Tier 4	2015 or later	1.3	0.03	0.14

Table A5b-4: Federal Switcher Locomotive Emission Standards

Emission Tier	Year of Original Manufacture	NOX (g/bhp-hr)	PM (g/bhp-hr)	HC (g/bhp-hr)
Tier 0	1973 – 1992	11.8	0.26	2.10
Tier 1	1993 – 2004	11.0	0.26	1.20
Tier 2	2005 – 2011	8.1	0.13	0.60
Tier 3	2012 – 2014	5.0	0.10	0.60
Tier 4	2015 or later	1.3	0.03	0.14

The SLA community boundary does not have any railyards, but does have three rail tracks used by BNSF and UP. CARB has two agreements with BNSF and UP to reduce locomotive emissions, including in and around railyards.[30] The agreement in 1998 required BNSF and UP to meet a fleet average of Tier 2 locomotives in the Basin every year between 2010 and 2030; both railroad companies have met this commitment every year. CARB has reported that emissions in recent years have increased due to increased activity.[31] The second agreement focused on railyards, and between 2005 and 2015 required implementing an idling-reduction program, maximizing the use of ultra-low sulfur diesel fuel, preparing health risk assessments, evaluating measures to further reduce DPM, and conducting an assessment of remote sensing technology to identify high-emitting locomotives. Despite these agreements, additional efforts are necessary to meet criteria air pollutant standards across the state. Due to the absence of federal action to address emissions from locomotives, CARB is currently developing a statewide In-Use Locomotive Regulation to reduce criteria air pollutant, TAC, and greenhouse gas emissions for in-use locomotives.[32]

[30] CARB, 1998 Locomotive NOx Fleet Average Emissions Agreement in the South Coast Air Basin, https://ww2.arb.ca.gov/1998-mou-summary-data-archive, and 2005 Statewide Rail Yard Agreement, https://ww2.arb.ca.gov/resources/documents/2005-statewide-railyard-agreement

[31] CARB, Concepts for In-Use Locomotive Regulation Workshop, Slide 21, https://ww2.arb.ca.gov/sites/default/files/2020-11/2020.10.28%20907AM%20Workshop%20Slides%20Day%201%20-%20Remediated.pdf

[32] CARB, Concepts to Reduce Rail Emissions from Locomotives and Railyards, https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california/concepts-reduce-emissions-locomotives-and

Currently, there are several CARB regulations to address onsite mobile sources at railyards and ports.[33] The Cargo Handling Equipment Regulation requires equipment (e.g., yard trucks, rubber-tired gantry cranes, top and side picks, and forklifts) at intermodal railyards and ports to meet engine performance and opacity standards.[34] The Drayage Truck Regulation requires heavy-duty vehicles that transport containers and bulk goods to and from intermodal railyards and ports to meet engine emissions performance standards and be registered with CARB. New regulations are also being considered and phased in, such as CARB's TRU Regulation which requires refrigeration units to meet engine performance standards and be registered with CARB. At railyards and ports, TRUs can be found on truck trailers, railcars, and connected to shipping containers as generator sets. CARB is also working with air districts, railroad companies, and U.S. EPA to resolve locomotive complaints. For more information on key upcoming regulations from U.S. EPA and CARB to reduce emissions from mobile sources, please refer to **Table A5b-5**.

[33] Although not in the SLA community boundary, the Ports of Los Angeles and Long Beach are concerns for the CSC.
[34] CARB, Cargo Handling Equipment, https://ww2.arb.ca.gov/our-work/programs/cargo-handling-equipment

Table A5b-5: Upcoming Regulations from U.S. EPA and CARB

Agency	Proposed Action	Expected Decision	Expected Phase-In Period
U.S. EPA	Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards*[35] – In response to a petition from state and local air agencies led by South Coast AQMD, U.S. EPA has committed to updating its heavy-duty vehicles and engine standards to reduce NOx emissions.	2022	2027-2031
CARB	Advanced Clean Fleets[36] – Would require fleets to transition to zero-emissions, including drayage trucks.	2023	2024-2045
CARB	Advanced Clean Car 2[37] – Would reduce criteria pollutants and greenhouse gas emissions from new light and medium-duty vehicles beyond the 2025 model year and increase the number of zero-emission vehicles for sale.	2022	2026-2035
CARB	Cargo Handling Equipment Regulation[34] – Would assess the availability and performance of zero-emission technology as an alternative to all combustion-powered cargo equipment and evaluate additional solutions that may include efficiency improvements.	2022	To Be Determined
CARB	In-Use Locomotive Regulation – Would reduce criteria air pollutant, TAC, and greenhouse gas emissions to address regional pollution and long-standing environmental justice concerns with communities near railyards and other locomotive operations.	2022	To Be Determined
CARB	Transport Refrigeration Unit (TRU) Regulation Phase II – Would establish new requirements to transition the transport refrigeration units not covered in the Phase I regulation (adopted in Feb. 2022) to zero-emission operations by requiring both zero-emission technology and supporting infrastructure	2024	To Be Determined

*The Control of Air Pollution from New Motor Vehicles was previously known as the Cleaner Truck Initiative.

[35] U.S. EPA, Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards - Supporting Testing, Research and Modeling, https://www.epa.gov/regulations-emissions-vehicles-and-engines/control-air-pollution-new-motor-vehicles-heavy-duty

[36] CARB, Advanced Clean Fleets, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets

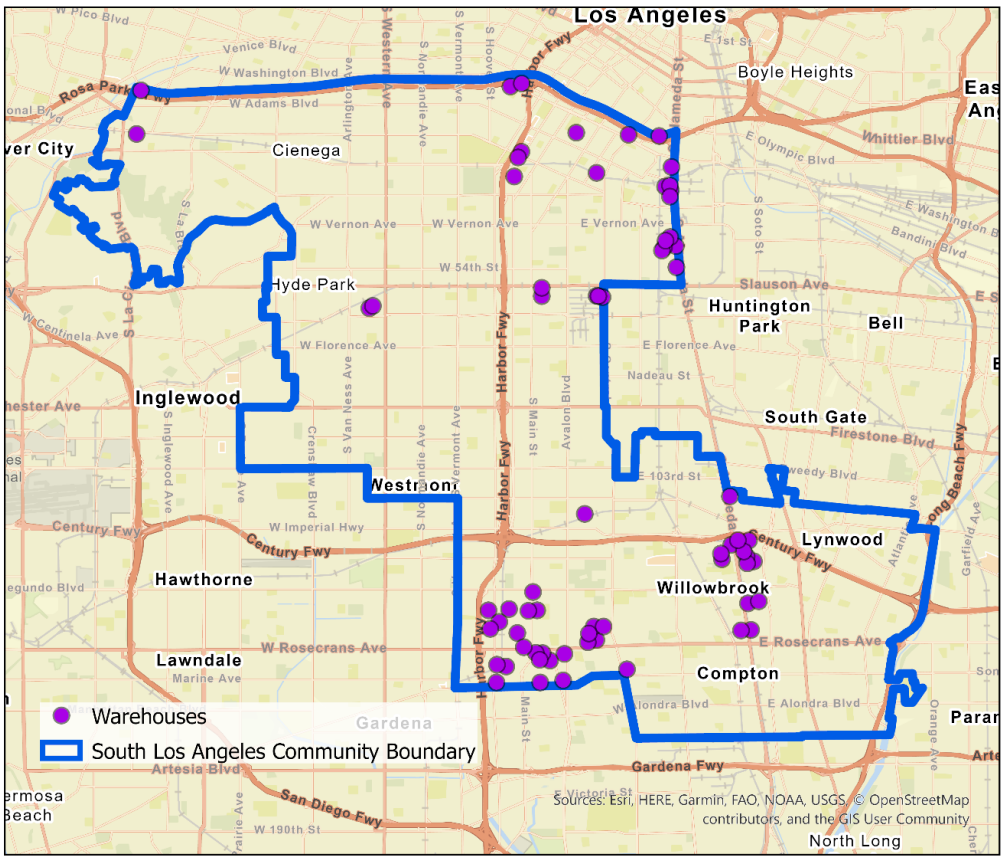
[37] CARB, Advanced Clean Cars Program, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program

South Coast AQMD

Warehouses

The South Coast AQMD Governing Board adopted Rule 2305 in May 2021. The purpose of the rule is to help meet state and federal air quality standards for ozone and PM2.5 by reducing local and regional emissions of NOx and PM and facilitating local and regional emissions reductions associated with warehouses and the mobile sources attracted to warehouses. Rule 2305 applies to warehouses greater than or equal to 100,000 square feet of indoor space in a single building conducting warehousing activities. There are approximately 70 warehouses in the SLA community boundary subject to Rule 2305, as shown in **Figure A5b-7**.

Figure A5b-7: Warehouses in SLA Subject to Rule 2305



Locomotives

South Coast AQMD has limited authority over locomotives and activities from railroad companies. If regulations are adopted, they will likely require federal approval before going into effect. With these limitations, South Coast AQMD is developing two indirect source rules (ISR) on railyards. The first rule will address new railyards (new railyards are currently proposed by BNSF in Colton and near West Long Beach).[38] The second rule would address existing railyards. South

[38] South Coast AQMD, Proposed Rule 2306 – Indirect Source Rule for New Intermodal Facilities, https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-2306

Coast AQMD continues to work with stakeholders (e.g., railyard operators, railroad, communities, etc.) on proposed concepts for the Proposed Rule 2306. It is currently scheduled to be presented to the South Coast AQMD Governing Board for consideration in October 2022.[39]

Air Monitoring

The SLA CERP does not include monitoring actions for mobile sources. Please refer to the Community Air Monitoring Plan (CAMP) for more information on air monitoring efforts for this community.

Compliance and Enforcement

Compliance and enforcement information for mobile sources in SLA is available in Chapter 4: Enforcement History and Overview and Appendix 4: Enforcement History and Overview. Since truck idling has been identified as a community priority, this CERP includes enhanced enforcement efforts intended to address SLA community concerns directly, taking community input into account where appropriate.

Both CARB and South Coast AQMD enforce the Commercial Vehicle Idling Regulation that restricts commercial vehicle idling[40] (gross vehicle weight rating of greater than 10,000 pounds) The regulation restricts idling to five minutes or less for commercial vehicles:

- Without a "Certified Clean Idle"[41] sticker, or
- With a "Certified Clean Idle" sticker and idling within 100 feet a of school, residence, hotel, or other restricted area, or
- Operating diesel-fueled auxiliary power systems within 100 feet of restricted areas.

The regulation also provides exceptions for queuing (i.e., vehicles waiting in line to perform work where shutting engines off is not possible). **Figure A5b-8** shows a "Certified Clean Idle" sticker provided for diesel engines that meet CARB's certification requirements.

The state's ATCM to address DPM from heavy-duty diesel vehicles specifically provides enforcement authority to air districts to enforce truck idling regulations. Activities for truck idling inspections fall into two categories:

- Those initiated by South Coast AQMD, which are prearranged field operations (also referred to as "sweeps" or inspections) to identify violating trucks.
- Those prompted by outside parties, such as public complainants and other governmental agency referrals.

[39] South Coast AQMD, Rule and Control Measure Forecast, May 6, 2022, http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-may6-019.pdf?sfvrsn=2

[40] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling

[41] CARB "Certified Clean Idle" are vehicles that use an engine that has been certified to an optional NOx idling emission standard of 30 grams per hour, https://ww2.arb.ca.gov/sites/default/files/classic/enf/advs/adv376.pdf

Truck idling inspections are unannounced in order to avoid advance warning and ensure that the inspector can identify any trucks that may be in violation of the truck idling regulations. The locations at which inspectors conduct field operations are chosen based on community input, historical complaint data, locations of sensitive receptors, and other data sources that give insight as to where trucks may be idling in the community. If a truck is found to be in violation of California's idling regulation, inspectors will take necessary enforcement action to address the non-compliant activity. This enforcement action generally takes the form of a Notice of Violation (NOV) to the owner of the vehicle. NOVs generally result in a fine and/or another penalty.

While there are many reasons to conduct an inspection, air pollution concerns received directly from community members through public complaints are a very important source of information. All complaints received are assigned to an inspector for investigation. The complaint telephone line is handled by a live attendant during business hours (Monday to Friday) or by a standby system during off hours. Complainant information is kept confidential and while anonymous complaints are accepted, providing contact information is crucial for the inspector to be able to gather any relevant information to conduct an effective investigation. **To report complaints, community members can call 1-800-CUT-SMOG (1-800-288-7664) or file an online complaint at https://www.aqmd.gov/home/air-quality/complaints.**

Figure A5b-8: CARB Certified Clean Idle Sticker

Incentives

Since 2017, the California Legislature has budgeted approximately $704 million to support the AB 617 program through annual incentives aimed to advance lower-emitting technologies, provide new opportunities for stationary source incentives, and support community-identified projects to implement CERPs statewide. CARB distributes these incentives through Community Air Protection Incentives;[42] South Coast AQMD refers to this as the Community Air Protection Program (CAPP) incentives.

[42] CARB, Community Air Protection Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives

CARB works with the California Air Pollution Control Officers Association (CAPCOA) to distribute incentive funds annually to the air districts throughout California for AB 617 designated communities and communities that are under consideration for selection in the AB 617 program. The amount of funding that the State Legislature allocates to AB 617 is determined each year. There is no guarantee to the amount that the state will allocate to AB 617 each year and the amount of funding each air district will receive (which is distributed by CARB). Air districts determine the final incentives distribution amongst their AB 617 designated communities. CARB's Community Air Protection Incentives 2019 Guidelines[43] also known as CAPP Guidelines at South Coast AQMD) identifies projects eligible for incentive funds and requirements for allocating the incentive funds. It is important to note, CAPP incentive funds can only be used for projects or technologies supported by an adopted CERP.

CAPP incentives help owners replace older higher-polluting vehicles and equipment with cleaner or zero-emission models. The incentives may also be used for changes at local industrial facilities to reduce emissions of toxic or smog-forming pollutants, to build or install zero-emission infrastructure (e.g., charging stations), or to support local measures that air districts and communities identify through an AB 617 CERP.

In South Coast AQMD AB 617 Year 1 and Year 2 communities, CAPP incentives funded approximately 740 mobile source projects (resulting in approximately $130.4 million in grants).[44] Examples of projects include the replacement of heavy-duty trucks, off-road equipment, and locomotives, and installation of zero-emission infrastructure (e.g., outlets for electric-powered truck refrigeration units). To date, approximately $247,000 in CAPP incentive funds have been allocated to SLA. For more information on CAPP incentives, including applications submitted and final projects selected, please refer to: **www.aqmd.gov/cappincentives**.

South Coast AQMD funds projects to develop and implement zero-emission technologies for heavy-duty trucks, such as battery-electric and fuel cell. Additionally, South Coast AQMD offers incentives to truck owners to replace older higher-polluting trucks with cleaner trucks. Specifically, truck owners must use these incentives to purchase trucks that are cleaner than what regulations currently require. South Coast AQMD's Voucher Incentive Program (VIP)[45] provides incentives for the purchase of newer lower-emission vehicles for small businesses with fleets of 10 or fewer vehicles that primarily operate within California. The Carl Moyer Program[46] (Moyer)

[43] CARB, Community Air Protection Incentives Guidelines, https://ww2.arb.ca.gov/resources/documents/community-air-protection-incentives-guidelines

[44] Year 1 (2018-designated) AB 617 communities refer to East Los Angeles, Boyle Heights, West Commerce; San Bernardino, Muscoy; and Wilmington, Carson, West Long Beach. Year 2 (2019-designated) AB 617 communities refer to Eastern Coachella Valley and Southeast Los Angeles.

[45] South Coast AQMD, Voucher Incentive Program, http://www.aqmd.gov/home/programs/business/business-detail?title=voucher-incentive-program&parent=vehicle-engine-upgrades

[46] South Coast AQMD, Carl Moyer Program (Heavy-Duty Engines), http://www.aqmd.gov/home/programs/business/business-detail?title=heavy-duty-engines&parent=vehicle-engine-upgrades

and Volkswagen mitigation programs incentivize emission reductions through the replacement of heavy-duty vehicles and other equipment operating in California. Moyer may also be used to support or develop infrastructure for zero- and near-zero emission technologies that are cleaner-than-required and cost-effective.

In addition to South Coast AQMD's programs, CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE)[47] accelerates the deployment of cleaner off-road technologies. CORE provides a streamlined way for fleets ready to purchase specific zero-emission equipment to receive funding to offset the higher cost of such technologies. Zero-emission off-road freight equipment that is currently in the early stages of commercial deployment are specifically targeted by this project. CORE will provide vouchers to California purchasers and lessees of zero-emission off-road freight equipment on a first-come, first-served basis, increasing incentives for equipment that is located in disadvantaged communities.

Despite not being within the SLA community boundary, the Ports of Los Angeles and Long Beach (Ports) are concerns for the CSC because of increased truck traffic from the goods movement. There are currently ongoing efforts to help address truck emissions within the Ports. Currently, the Ports are developing their Clean Truck Program as part of their Clean Air Action Plan to reduce port emissions.[48] The purpose of the Clean Truck Program is to generate a source of incentive funds for zero-emission drayage trucks and to fund the supporting zero-emission infrastructure. The funds would be generated by charging a fee per loaded container to trucks entering the ports, with an exemption for cleaner trucks. In March 2020, the Ports' harbor commissioners voted to support a cargo container rate of $10 per TEU, or $20 per Forty-Foot Equivalent Unit (FEU). This rate is anticipated to provide approximately $90 million per year for drayage truck incentives. In late 2021, the CTF Rate was adopted into the Ports' tariffs and fee collection is anticipated to begin in April 2022.

South Coast AQMD administers the Lower-Emission School Bus Program[49] to replace diesel public school buses. The program replaces diesel school buses with zero-emission or near-zero emission alternative fuel buses which will reduce children's exposure to toxic DPM emissions. The program also funds alternative fueling or charging infrastructure and on-board compressed natural gas (CNG) tank replacement. Applicants may also qualify for the California Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP)[50] which provides point of sale vouchers to make zero- and near-zero emission vehicles more affordable. Additionally, the U.S. EPA recently initiated a new Clean School Bus Program[51] to provide five billion dollars over the course of five

[47] California Air Resources Board, Clean Off-Road Equipment Voucher Incentive Project, https://ww2.arb.ca.gov/our-work/programs/clean-off-road-equipment-voucher-incentive-project/about

[48] The Port of Los Angeles, Clean Truck Program, https://www.portoflosangeles.org/environment/air-quality/clean-truck-program

[49] South Coast AQMD, Lower-Emission School Bus Program, https://www.aqmd.gov/home/programs/business/lower-emission-school-bus-program

[50] California Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, https://californiahvip.org/

[51] U.S. EPA, Clean School Bus Program Funding, https://www.epa.gov/cleanschoolbus

years (Fiscal Year 2022-2026) to replace existing school buses with clean and zero-emission models.

South Coast AQMD currently administers the Replace Your Ride Program[52], which encourages scrapping and replacing an older vehicle with an advanced technology cleaner vehicle. The program is geared toward prioritizing applicants who reside within a Disadvantaged Community (DAC) and are low income. Replace Your Ride also gives a higher incentive to participants who decide to replace their vehicle with a Plug-in Hybrid (PHEV) or a zero-emission vehicle. Additionally, applicants who purchase a PHEV or dedicated battery electric vehicle (BEV) are eligible for an additional incentive to install electric vehicle charging equipment.

[52] South Coast AQMD, Replace Your Ride Program, https://xappprod.aqmd.gov/RYR/Home

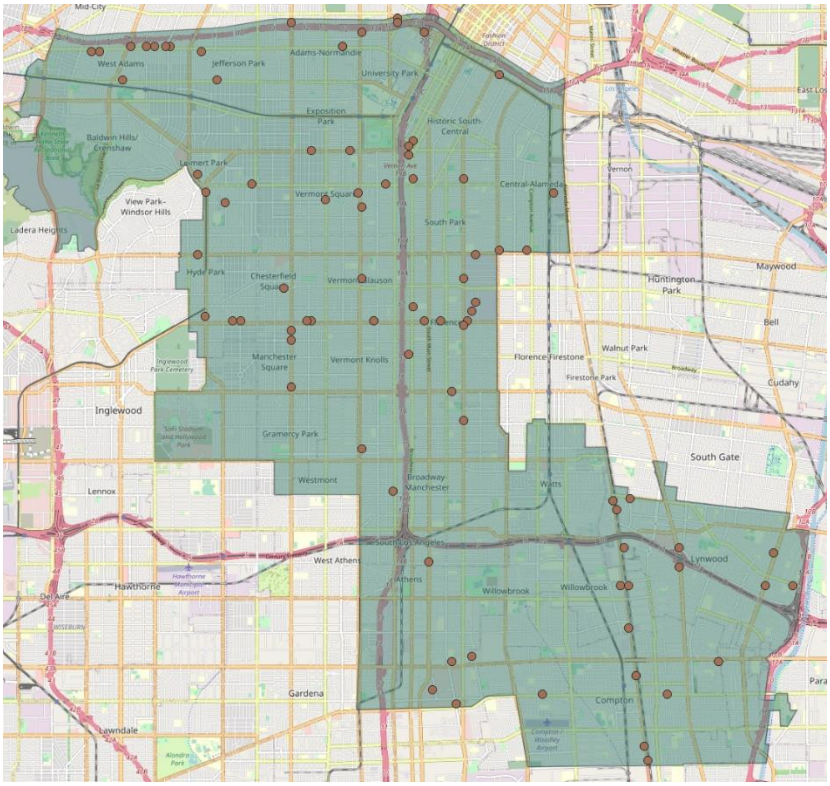
Appendix 5c

Auto Body Shops

Introduction

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for this Community Emissions Reduction Plan (CERP). One of the concerns raised by the South Los Angeles (SLA) CSC is the volume and activities of both permitted and unpermitted auto body shops and their proximity to residences, schools, and public gathering areas. The CSC also expressed concerns with soil and water contamination, proper hazardous waste disposal, land-use issues, worker exposure, and noise pollution from some auto body shops and operations conducted on vacant lots. This appendix provides additional supporting information for Chapter 5c: Auto Body Shops, including an overview of community impacts, emissions, and regulatory efforts. The overview of regulatory efforts includes a summary of regulatory authority, air monitoring, compliance and enforcement, and incentives in addressing emissions from and exposure to auto body shops.

Figure A5c-1: Map of Facilities Applicable to the Auto Body Shop Air Quality Priority



Community Impacts from Auto Body and Repair Shops

There are approximately 89 permitted auto body shops within the SLA community boundary based on the South Coast AQMD permitting database[1] (**Figure A5c-1**). Auto body shops are primarily classified within the North American Industry Classification System (NAICS)[2] as code 81121: Automotive Body, Paint, and Interior Repair and Maintenance. Additional NAICS codes for auto body shops include: 336111: Automobile Manufacturing, 336211: Motor Vehicle Body Manufacturing, 811111: General Automotive Repair, and 811198: All Other Automotive Repair and Maintenance (**Table A5c-1**).[3] Auto body shops conduct a variety of operations specializing in the repair of vehicles by fixing paint or body damage from scratches, dents, and collisions and as such multiple NAICS codes may apply to permitted body shops within the SLA community. Auto repair shops do maintenance and repair on vehicles including mechanical and electrical work.

Table A5c-1: NAICS Designation Examples Applicable to Auto Body Shops in SLA

NAICS Code	NAICS Industry Title	NAICS Industry Description
336111	Automobile Manufacturing	Facilities primarily engaged in 1) manufacturing complete automobiles (i.e., body and chassis or unibody) or 2) manufacturing automobile chassis only
336211	Motor Vehicle Body Manufacturing	Facilities primarily engaged in manufacturing truck and bus bodies and cabs and automobile bodies. Products made may be sold separately or may be assembled on purchased chassis and sold as complete vehicles
811111	General Automotive Repair	Facilities primarily engaged in providing 1) a wide range of mechanical and electrical repair and maintenance services for automotive vehicles, such as passenger cars, trucks, and vans, and all trailers or 2) engine repair and replacement
811121	Automotive Body, Paint, and Interior Repair and Maintenance	Facilities primarily engaged in repairing or customizing automotive vehicles, such as passenger cars, trucks, and vans, and all trailer bodies and interiors; and/or painting automotive vehicles and trailer bodies
811198	All Other Automotive Repair and Maintenance	Facilities primarily engaged in providing automotive repair and maintenance services (except mechanical and electrical repair and maintenance; body, paint, interior, and glass repair; motor oil change and lubrication; and car washing) for automotive vehicles, such as passenger cars, trucks, and vans, and all trailers

[1] The total number of facilities applicable to this air quality priority was arrived at using multiple sources, such as permit type, technical specialty (TS) number, and NAICS codes. TS refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

[2] United States Census Bureau, North American Industry Classification System, https://www.census.gov/naics/

[3] The NAICS designation is not provided by South Coast AQMD. Rather, the NAICS designation is provided by the owner or operator within the permit application submitted to South Coast AQMD for any applicable equipment.

Emissions from Auto Body Shops

Emissions information for SLA auto body shops is available in Chapter 2d: Emissions and Source Attribution Analysis and Appendix 2d: Source Attribution. The emissions information in Appendix 2d includes several categories that may fall within this industry, such as coatings and related processes, cleaning and surface coatings, and consumer products.

Figure A5c-2: Auto Body Repair Shop Painting a Motor Vehicle

This section will highlight emissions of toxic air contaminants (TACs) from this air quality priority since they were identified as a concern from the community.

People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems. Auto body shop coatings and solvents (**Figure A5c-2**) may contain ethylbenzene, tert-Butyl acetate (tBAC), and parachlorobenzotrifluoride (PCBTF). Ethylbenzene is classified as a volatile organic compound (VOC) and is usually found in concentrations less than five percent in coatings. PCBTF is classified as an exempt solvent[4] in autobody coatings and may be found in much higher concentrations. tBAC may also be found in higher concentrations but is not considered an exempt solvent in the South Coast AQMD, except in limited applications.[5] Exempt compounds (VOC Exemptions) are certain VOCs that the United States Environmental Protection Agency (U.S. EPA) excluded from the regulatory definition of a VOC as these VOCs have negligible contribution to the formation of ground-level ozone (smog).[6] Rule 1151[7] prohibits manufacturing, selling, offering for sale, distributing for use, or applying any automotive coating which contains any Group II Exempt Compounds as defined in Rule 102 which includes TACs such as methylene chloride and perchloroethylene. Rule 1151 also has specific provisions that prohibit the use of automotive coatings that contain cadmium or hexavalent chromium.

[4] South Coast AQMD, Rule 102 – Definition of Terms, http://www.aqmd.gov/docs/default-source/rule-book/reg-i/rule-102-definition-of-terms.pdf

[5] South Coast AQMD, Exempt Compounds, https://www.aqmd.gov/home/rules-compliance/compliance/vocs/exempts

[6] U.S. EPA, Volatile Organic Compound Exemptions, https://www.epa.gov/ground-level-ozone-pollution/volatile-organic-compound-exemptions

[7] South Coast AQMD Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1151.pdf

Regulatory Efforts

Regulatory Authority

Auto body shops are regulated by South Coast AQMD as stationary sources of emissions for several air pollutants. Emissions from the operations and activities conducted at these sites may also have control technology requirements, such as paint spray booths, spray gun technology, and transfer efficiency. Several South Coast AQMD rules address VOC content limits of coatings and solvents, and also require housekeeping, recordkeeping, and storage requirements to limit emissions of VOC. Use of certain products at auto body shops may also have requirements through California Air Resources Board's (CARB's) authority over consumer products and TACs.

State and Federal Actions

United States Environmental Protection Agency (U.S. EPA) and California Air Resources Board (CARB)

In accordance with the Clean Air Act (CAA), the U.S. EPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAP) as stationary source standards for hazardous air pollutants (**Table A5c-2**). The U.S. EPA has listed "Paint Stripping,'' ''Plastic Parts and Products (Surface Coating),'' and "Autobody Refinishing Paint Shops'' as area sources of hazardous air pollutants (HAP) that contribute to the risk to public health in urban areas under the Integrated Urban Air Toxics Strategy.[8] CARB has established a Suggested Control Measure for Automotive Coatings[9] which has been incorporated in South Coast AQMD Rule 1151.[7] CARB also established an Airborne Toxics Control Measure (ATCM) for Emissions of Chlorinated Toxic Air Contaminants from Automotive Maintenance and Repair Activities.[10]

Bureau for Automotive Repair (BAR)

Another California regulatory agency overseeing operations and activities at auto body shops is BAR, which specifically licenses and regulates automotive repair dealers, Smog Check stations and technicians, and brake and lamp stations and adjusters.[11] BAR also manages the Smog Check test-and-repair (STAR) Station Certification program. South Coast AQMD will partner with BAR and other appropriate regulatory agencies when issues are found during inspections that fall outside of South Coast AQMD's jurisdiction.

[8] U.S. EPA, Paint Stripping and Miscellaneous Surface Coating Operations: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources, https://www.epa.gov/stationary-sources-air-pollution/paint-stripping-and-miscellaneous-surface-coating-operations

[9] CARB, Suggested Control Measure for Automotive Coatings, https://ww2.arb.ca.gov/our-work/programs/coatings/automotive-refinishing/suggested-control-measure-automotive-coatings

[10] CARB, ATCM for Automotive Maintenance and Repair Activities, https://ww2.arb.ca.gov/resources/documents/atcm-automotive-maintenance-and-repair-activities

[11] Bureau of Automotive Repair, About, https://bar.ca.gov/About_BAR/

Table A5c-2: State and Federal Programs to Address Emissions from Auto Body Shops

Program	Purpose
CARB ATCM for Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings[12]	• A statewide air emission control program to reduce air emissions from motor vehicle and mobile equipment coatings at stationary sources, including measures that address emissions of hexavalent chromium and cadmium
CARB Consumer Products Regulation[13]	• A statewide regulation that sets VOC limits for chemically formulated consumer products • Sets limits on toxic compounds and compounds with high Global Warming Potential (GWP) values for certain regulated categories
U.S. EPA NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (Subpart HHHHHH)[8]	• A federal program that aims to control air emissions from paint stripping and surface coating operations
U.S. EPA Collision Repair Campaign[14]	• A federal program that addresses emissions from this industry through a voluntary effort aimed at reducing exposure to toxic air emissions from collision repair shops

South Coast Air Quality Management District

South Coast AQMD's efforts to address this air quality priority in the SLA community include regulations, air monitoring, and enforcement activities to identify, characterize, and address emissions from auto body shops.

Auto body shops that utilize spray coatings must conduct spray coating operations inside a spray booth, which requires a South Coast AQMD permit. It should be noted that auto body shops do not require a permitted spray booth if they demonstrate low usage. However, in the City of Los Angeles, open spraying is prohibited and is considered a municipal code violation. Coatings and solvents contained and utilized at auto body shops must meet all applicable rule requirements to ensure VOC emissions are minimized. **Table A5c-3** provides an overview of South Coast AQMD rules that may be applicable to auto body shops. Some of the products used at these facilities may cause odors and emit air pollutants such as VOCs, or may contain HAPs excluding cadmium,

[12] CARB, ATCM for Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings, https://ww2.arb.ca.gov/our-work/programs/coatings/automotive-refinishing

[13] CARB, Consumer Products Program, https://ww2.arb.ca.gov/our-work/programs/consumer-products-program

[14] U.S. EPA, About the Collision Repair Campaign, https://www.epa.gov/collision-repair-campaign/about-collision-repair-campaign

hexavalent chromium, methylene chloride, and perchloroethylene which are prohibited in Rule 1151[7] and by the definition of a VOC under Rule 102.[4] The emissions and odors may come from solvents evaporating from paint and solvent application, cleaning of parts, or improper storage. Auto body shops may also conduct operations such as sanding, grinding, and spraying of coatings, which can emit fine dust, or particulate matter (PM) such as paint overspray.

Table A5c-3: South Coast AQMD Rules to Address Auto Body Shops[15]

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
102[4]	All sources	N/A	• Defines terms used in South Coast AQMD rules	• All South Coast AQMD rules	• Definitions
109[16]	All sources	VOCs	• Recordkeeping for sources of VOCs when required by South Coast AQMD	• Owners or operators of stationary sources that conduct operations emitting VOCs	• Specified duration for retention of daily recordkeeping • Option for monthly recordkeeping, if applicable • Alternative recordkeeping system • Test methods
219[17,18]	All sources	VOCs	• Identify equipment, processes, or operations that emit small amounts of air contaminants that do not require written permits	• Includes coating and adhesive processes and equipment	• Spray coating equipment operated within control enclosures • Coating or adhesive application equipment must maintain VOC emissions under three pounds per day or less or 66 pounds per calendar month or less • Recordkeeping requirements pursuant to Rule 109 • Exemptions for equipment pursuant to Rules 402[19] and 1401[20]

[15] All facilities within South Coast AQMD's jurisdiction that have the potential to emit air pollutants through equipment operation or use of regulated products may be subject a number of South Coast AQMD rules. For more information related to the entire suite of South Coast AQMD rules, please refer to: http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book

[16] South Coast AQMD, Rule 109 – Recordkeeping for Volatile Organic Compound Emissions, http://www.aqmd.gov/docs/default-source/rule-book/reg-i/rule-109.pdf

[17] This rule is applicable to a variety of sources and is included in this list in reference to auto body shop spray coating equipment. For information on this rule and its applicability, please refer to: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-219.pdf

[18] South Coast AQMD, Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II, http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf

[19] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

[20] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions

481[21]	Spray painting and coating operations	VOCs	• Reduce emissions from applicable operations	• Spray painting operations and equipment	• Meet specified conditions for operating any spray painting or spray coating equipment
					  ○ Must be operated inside a control enclosure with face velocity requirements
					  ○ Must be applied with high-volume, low-pressure spray equipment
					• Test Methods
					• Does not apply to spray coatings of 3 pound or less per day or 66 pounds or less per calendar month

1107[22]	Coating of metal parts and products	VOCs	• Reduce VOC emissions from coating of metal parts and products	• All metal coatings operations except those performed on aerospace assembly, magnet wire, marine craft, motor vehicle, metal container, and coil coating operations	• Specified methods of coating application and in accordance with manufacturer specifications • VOC limits • Disposal and cleaning • Analysis methods • Recordkeeping requirements for coating and solvent usage pursuant to Rule 1091616
1132[23]	High emitting spray booth facilities	VOCs	• Reduce VOC emissions from spray coating or laminating operations in high VOC-emitting facilities.	• Any spray booth facility, except petroleum industry facilities, that uses VOC-containing materials that amount to more than 20 tons per year of VOC emissions for a specified emissions inventory year	• Spray booth requirements • Recordkeeping and reporting requirements
1151[7]	Motor vehicle and mobile equipment non-assembly line coating operations	VOCs, TACs, Stratospheric Ozone-Depleting and Global-Warming Compounds	• Reduce emissions of applicable air pollutants from automotive coating applications preformed on	• Any person who uses, applies, or solicits the use or application of any automotive coating or associated solvent • Additionally, any person who supplies,	• VOC content limits • Prohibition of sale of automotive coatings exceeding VOC content limits • Alternative compliance allowed by using an approved emission control system

[21] South Coast AQMD, Rule 481 – Spray Coating Operations, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-481.pdf

[22] South Coast AQMD, Rule 1107 – Coating of Metal Parts and Products, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1107.pdf

[23] South Coast AQMD, Rule 1132 – Further Control of VOC Emissions from High-Emitting Spray Booth Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1132-further-control-of-voc-emissions-from-high-emitting-spray-booth-facilities.pdf

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
			motor vehicles, mobile equipment, and associated parts and components	sells, offers for sale, markets, manufactures, blends, packages, repackages, possesses distributes any automotive coating or associated solvent	• Recordkeeping requirements for VOC emissions and emission control systems pursuant to Rule 109[16] • Administrative requirements for automotive coating manufacturers • Test Methods
1168[24]	Adhesive and sealant applications	VOCs, TACs, and Stratospheric Ozone-Depleting Compounds	• Reduce emissions of applicable air pollutants from the application of adhesives, adhesive primers, sealants, and sealant primers	• Any person who uses, sells, stores, supplies, distributes, offers for sale, or manufactures for sale any adhesives, adhesive primers, sealants, or sealant primers	• VOC limits • Regulated products exceeding VOC limits, may not be used, sold, stored, supplied, distributed, offered for sale, or manufactured • Recordkeeping requirements for regulated product usage pursuant to Rule 109[16] • Test Methods • Administrative Requirements
1171[25]	Solvent cleaning operations	VOCs, TACs, and Stratospheric Ozone-Depleting Compounds	• Reduce emissions of applicable air pollutants from use, storage, and disposal of solvent cleaning materials in solvent cleaning operations and activities	• All persons who use solvent materials in solvent cleaning operations during the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or general work areas • All persons who store and dispose of these materials used in solvent cleaning operations • All solvent suppliers who supply, sell, or offer for sale solvent cleaning materials for use in solvent cleaning operations	• Requirements for solvent usage in cleaning operations • VOC limits • Solvent cleaning may only be performed using the specified cleaning devices or methods • All VOC-containing solvents used in solvent cleaning operations shall be stored in non-absorbent, non-leaking containers • Recordkeeping requirements pursuant to Rule 109[16] • Labeling requirements for selling regulated product • Test Methods

Air Monitoring

The coatings and solvents used at auto body shops may cause odors and emit air pollutants such as VOCs, while sanding and grinding operations can emit fine dust or PM that could contain metals. South Coast AQMD rules and permit requirements have provisions to limit the emissions

[24] South Coast AQMD, Rule 1168 – Adhesive and Sealant Applications, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1168.pdf

[25] South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf

of VOC and PM. South Coast AQMD's monitoring strategy to address this air quality priority consists of conducting initial measurement surveys near auto body shops to identify any elevated levels of pollutants and characterize any emissions from these facilities. These surveys will focus on those facilities and locations identified and prioritized by the CSC and will initially rely on mobile monitoring which involves advanced air monitoring technologies for detection of VOCs and particulate metals. Measurements will be made downwind from these facilities and concurrent measurement of wind speed and direction during surveys will be used to help identify possible sources of emissions. Findings from these initial surveys will be used to determine whether additional measurements are needed (e.g., collection of samples for laboratory analysis). Measurements may also be expanded to other areas of SLA near auto body shop locations that were not prioritized by the CSC.

Figure A5c-3: Auto Body Repair Shop Painting a Motor Vehicle

Compliance and Enforcement

Compliance and enforcement information for auto body shops in SLA is available in Chapter 4: Enforcement Overview and History and Appendix 4: Enforcement Overview and History.

South Coast AQMD inspectors regularly conduct enforcement activities at auto body shops (**Figure A5c-3**) within SLA. These activities fall into two categories:

- Those initiated by South Coast AQMD, such as routine facility inspections or targeted rule inspections.
- Those prompted by outside parties, such as, complaint investigations, facility notifications, and agency referrals.

While there are many reasons to conduct an inspection, air pollution concerns received directly from community members through public complaints are a very important source of information. All complaints received are assigned to an inspector for investigation. The complaint telephone line is handled by a live attendant during business hours (Monday to Friday) or by a standby system during non-business hours. Complainant information is kept confidential. While anonymous complaints are accepted, providing contact information is crucial for the inspector to be able to gather any relevant information to conduct an effective investigation. **To report complaints, community members can call 1-800-CUT-SMOG (1-800-288-7664) or file an online complaint at https://www.aqmd.gov/home/air-quality/complaints.**

Inspections are generally unannounced so that the inspector can observe a facility conducting normal operations. Inspections are conducted to evaluate the overall compliance status of the

facility or to focus on specific aspects of an operation to ensure the facility is following a specific rule or regulation. When on-site, inspectors will verify compliance with all rules, regulations, and permit conditions that are relevant to a facility.

If a facility is determined to be out of compliance with air pollution rules or regulations or permit conditions, inspectors will take necessary enforcement action to address the non-compliant activity. There are two types of enforcement actions:

1. A Notice to Comply (NC) may be issued for minor violations found during an inspection or to request additional information.
2. A Notice of Violation (NOV) may be issued for violations of rules or permit conditions. NOVs usually result in a penalty.

If a facility cannot immediately comply with air pollution laws, it may seek a variance from a rule requirement or permit condition by filing a petition and appearing before the South Coast AQMD Hearing Board.[26] In cases of ongoing noncompliance, a petition for an Order for Abatement may be brought against the facility, which will seek to require the company to take specific actions or cease operating in violation of South Coast AQMD rules or regulations. These processes serve to ensure that a facility returns to compliance expeditiously while minimizing air quality impacts.

Since auto body shops have been identified as a community priority, Assembly Bill 617 CERP actions include enhanced enforcement efforts intended to address SLA community concerns directly, taking community input into account where appropriate. Enhanced enforcement efforts include the actions identified in Chapter 5c: Auto Body Shops.

Incentives

For information related to incentives, please refer to Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

[26] Please refer to Appendix 4 for more information regarding the South Coast AQMD Hearing Board.

Appendix 5d

General Industrial Facilities

Introduction

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for this Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC expressed concerns about health effects from emissions of criteria air pollutants and toxic air contaminants (TACs) from various facilities, especially unpermitted facilities, dry cleaners, manufacturers, gas stations, and chemical production within the community. The community also raised concerns related to potential California Environmental Quality Act (CEQA) exemptions for operations and projects at construction sites. This appendix provides additional supporting information for Chapter 5d: General Industrial Facilities, including an overview of applicable facilities, emissions, and regulatory efforts. The overview of regulatory efforts includes a summary of regulatory authority, air monitoring, compliance and enforcement, and potential incentive opportunities in addressing emissions from and exposure to general industrial facilities.

Community Impacts from General Industrial Facilities

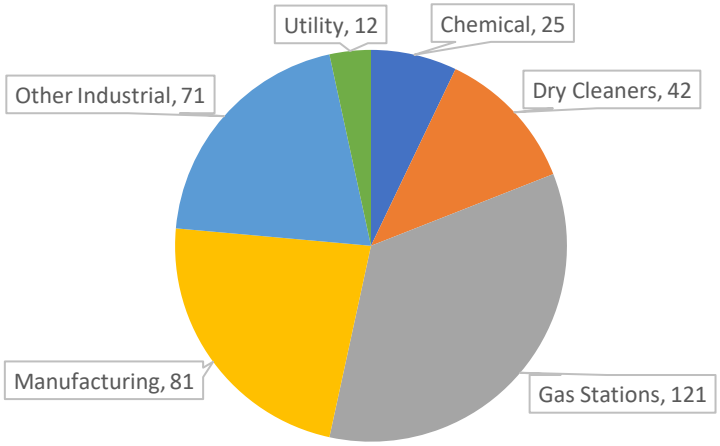
There are currently 353 general industrial facilities[1,2,3] distributed throughout the SLA community as shown in **Figure A5d-1**, including 42 dry cleaners. A map of key stationary sources of pollution, including general industrial facilities, can be viewed online on the SLA Story Map.

[1] The total number of facilities applicable to this air quality priority was arrived at using multiple sources, such as permit type, technical specialty (TS) number, and North American Industry Classification System (NAICS) codes. TS refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

[2] United States Census Bureau, NAICS, https://www.census.gov/naics/

[3] The NAICS designation is not provided by South Coast AQMD. Rather, the NAICS designation is provided by the owner or operator within the permit application submitted to South Coast AQMD for any applicable equipment.

Figure A5d-1: Distribution of General Industrial Facilities in SLA[1]



To find out more information about the specific facilities in the SLA community, South Coast Air Quality Management District's (South Coast AQMD's) Facility INformation Detail (F.I.N.D.)[4] tool may be used to provide information such as a facility's permitted equipment, compliance, and emissions history. **Table A5d-1** provides an overview of the information available on the F.I.N.D. tool while **Figure A5d-2** shows an example of the interactive map on F.I.N.D. through which a facility can be located, and its information accessed.

Table A5d-1: Overview of Available Information on General Industrial Facilities on the F.I.N.D. Tool

Section	Information
Facility Details	• Facility name • Address • Facility status (active, out-of-business, etc.) • Standard Industrial Classification (SIC) code
Equipment List	• Application and permit number ○ Application number links to an application details page • Permit and application status • Application and permit issue dates • Equipment type and description
Compliance	• History of Notices of Violation (NOVs) • Recent Notices to Comply (NCs) ○ January 2003 to present • NOV and NC details can be viewed by clicking on the notice number

[4] South Coast AQMD, Facility Information Detail (F.I.N.D.), http://www.aqmd.gov/nav/FIND

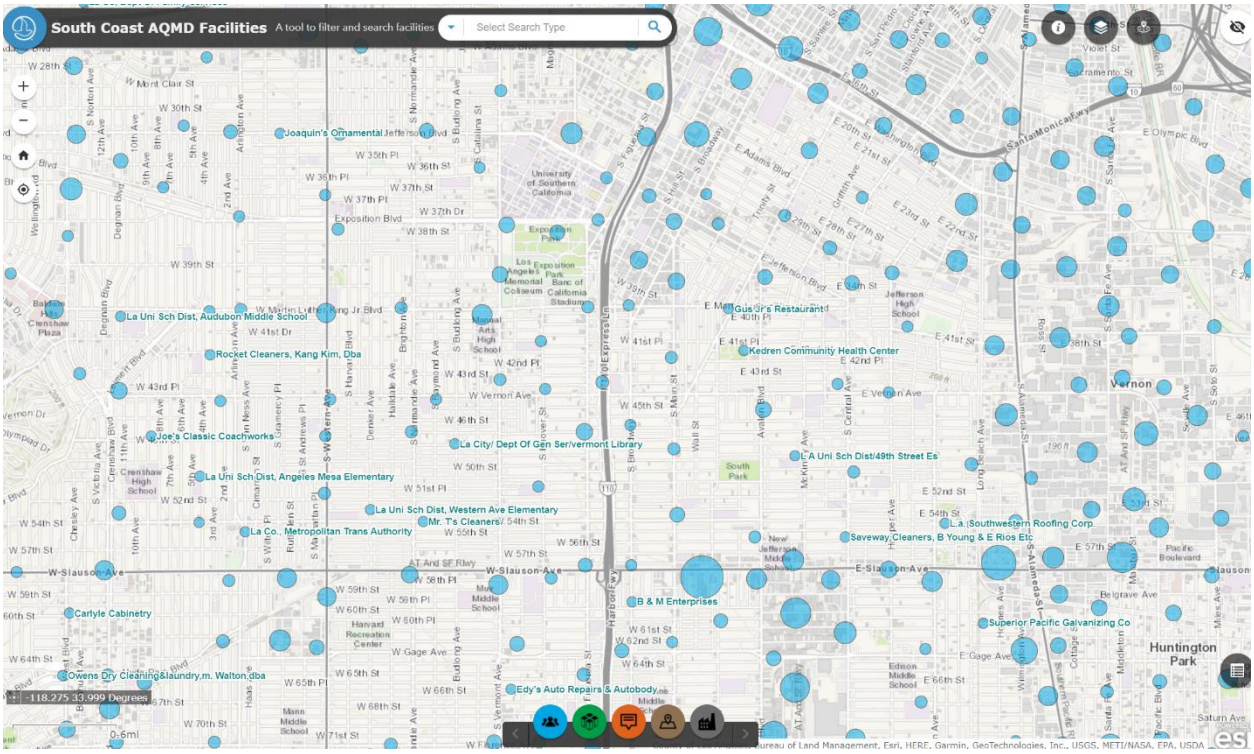
Section	Information
***Emissions**	• Reported criteria and toxic emissions by year and pollutant type**
Hearing Board	• Case tracking data • Imaged documents
Transportation	• South Coast AQMD Rule 2202– On Road Motor Vehicle Mitigation Options transportation plan details ○ Due dates ○ Current status and Plan Reviewer contact information
Documents	This section of F.I.N.D. provides documents for the following sections: • Compliance • Permits to Operate • Permits to Construct • Emissions* • Hearing Board • Facility Permits • Rule 222 Registration

* Not all active facilities are required to submit an annual emissions report, this only applies to facilities that have an estimated annual emission of four or more tons of either nitrogen oxides (NOx), specific organic gases (SPOG), sulfur oxides (SOx), particulate matter (PM), or volatile organic compounds (VOCs), or emissions of 100 tons per year (tpy) or more of carbon monoxide (CO); in Assembly Bill 2588 (AB 2588); or subject to CARB's Criteria Pollutant and Toxics Emissions Reporting (CTR) Regulation.[5]

** F.I.N.D. only has emissions data available going back to 2000.

[5] CARB, Criteria Pollutant and Toxics Emissions Reporting, https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting

Figure A5d-2: Example South Coast AQMD's F.I.N.D. Interactive Map Showing Location of Active Facilities***



*** As a note, the size of blue dot represents relative number of facilities in that area. For example, a larger blue dot represents a larger number of facilities in that area.

Emissions from General Industrial Facilities

Emissions information for SLA general industrial facilities is available across several major source categories in Chapter 2d: Emissions and Source Attribution Analysis and Appendix 2d: Source Attribution.

While general industrial facilities emit volatile organic compounds (VOCs), the SLA CSC identified the dry cleaning solvent perchloroethylene (PERC) as a pollutant of concern due to its carcinogenic properties. **Figure A5d-3** shows that approximately 77 percent of estimated PERC emissions, equating to approximately 24 tons per year (tpy) compared to 32 tpy overall, in the SLA community were from dry cleaning facilities in 2019,[6] the latest year for when such data were available.

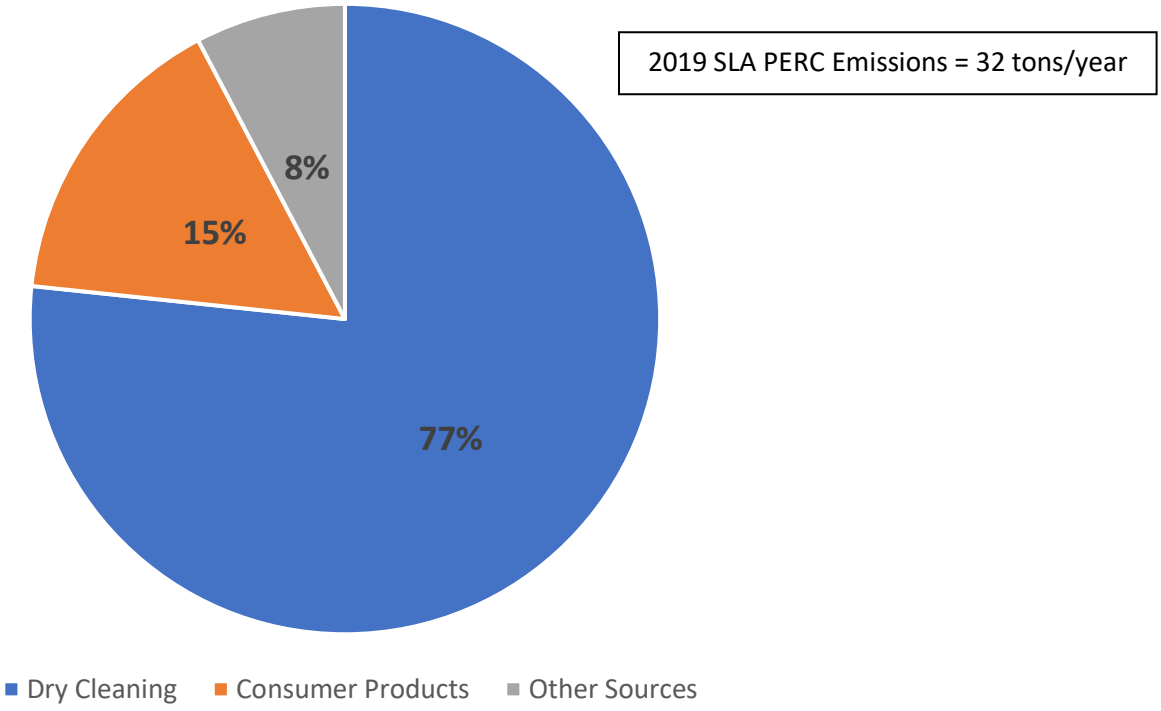
To address PERC emissions, South Coast AQMD Rule 1421[7] prohibited the use of PERC after December 31, 2020. In response, dry cleaning operators were required to cease using PERC in dry cleaning operation. Operators had the option to switch to using solvents that are compliant

[6] For more information regarding source attribution emissions, please refer to Appendix 2d.

[7] South Coast AQMD, Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1421.pdf

with Rule 1102 or other technologies such as wet cleaning systems, which are exempt from permitting pursuant to Rule 1102.[8]

Figure A5d-3: 2019 Relative Source Contribution to PERC Emissions in SLA[6]



Dry Cleaning Grant Program

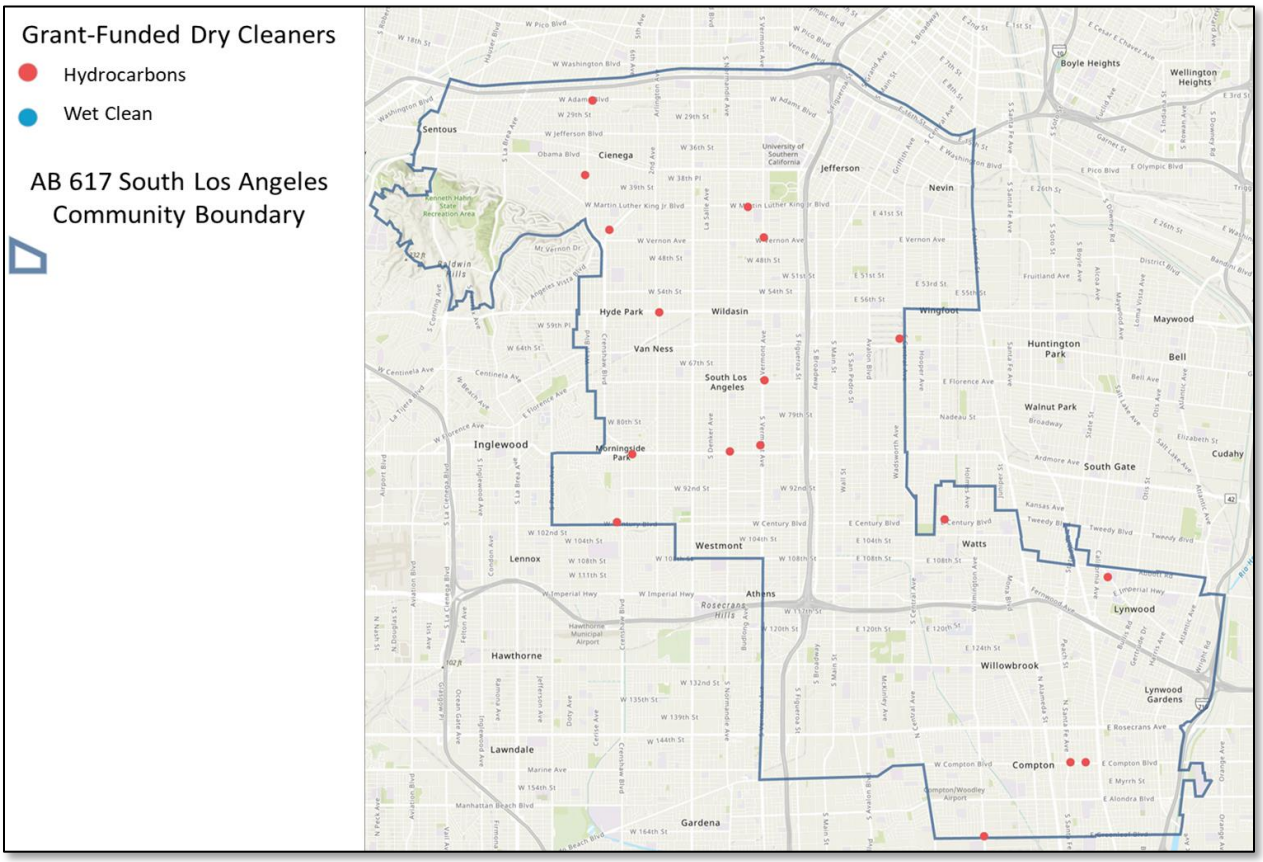
During the adoption of amendments of Rule 1421 in December 2002 to phase-out PERC from dry cleaning operations, the South Coast AQMD Board established a financial incentive grant program to assist dry cleaners and accelerate the transition to non-perc alternative cleaning technologies before the rule compliance dates. Over the course of the program, the Dry Cleaning Grant Program issued a total of $4.2 million dollars in funding to dry-cleaners and assisted over 650 businesses with the transition from PERC to non-toxic dry-cleaning processes. The grant money was distributed on a first-come, first-serve basis in the following amounts:

- $20,000 grants available for: Carbon Dioxide Machines
- $10,000 grants available for: Professional Wet Cleaning Systems (water-based system consisting of washer, dryer, tensioning pants topper, and tensioning form finisher, South Coast AQMD approved equipment only)
- $5,000 grants available for: Incomplete Professional Wet Cleaning Systems (South Coast AQMD approved equipment only)

[8] South Coast AQMD, Rule 1102 – Dry Cleaners Using Solvents Other Than Perchloroethylene, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1102-dry-cleaners-using-solvent-other-than-perchloroethylene.pdf

Rule 1421 was fully implemented on December 31, 2020,and owners or operators of dry cleaning operations can no longer use PERC dry cleaning machines. As a result, the Dry Cleaning Grant Program is no longer available. The Dry Cleaning Grant Program provided funding to 17 (**Figure A5d-4**) dry cleaning businesses in the SLA community, totaling approximately $100,000 in grant funding.

Figure A5d-4: Map of Grant-Funded Dry Cleaners in SLA

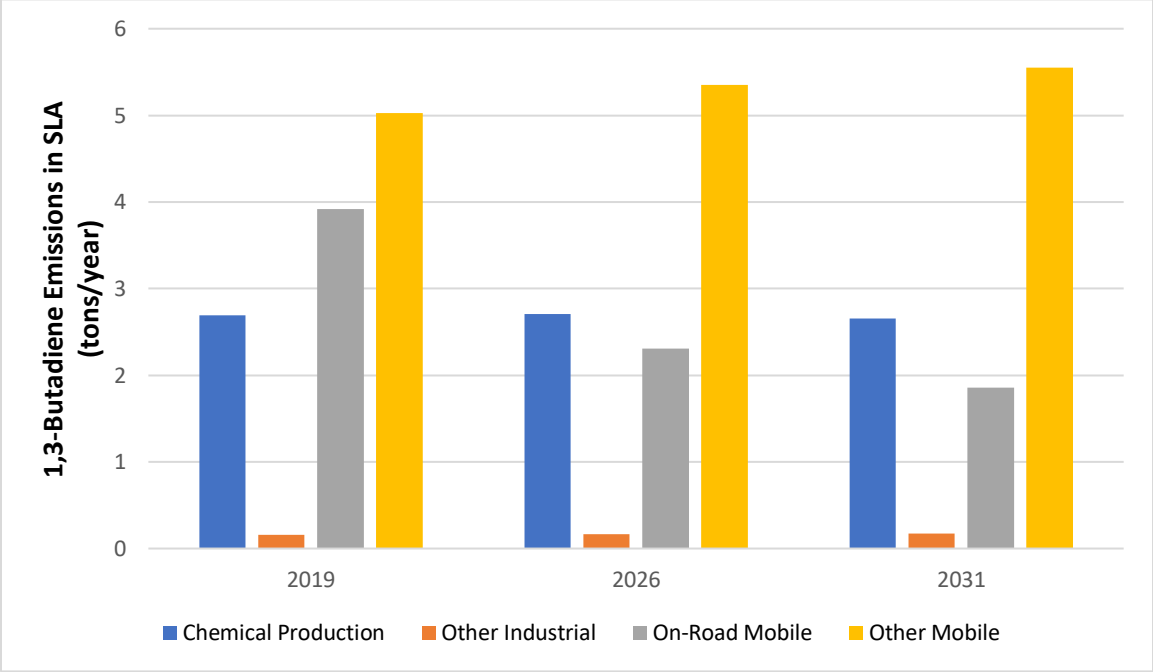


Other Toxic Air Contaminants from General Industrial Facilities

While the emissions of 1,3-butadiene, a VOC with carcinogenic properties, predominantly come from the combustion of gasoline from mobile sources, the industrial production of plastics is another source of 1,3-butadiene emissions in the SLA community.

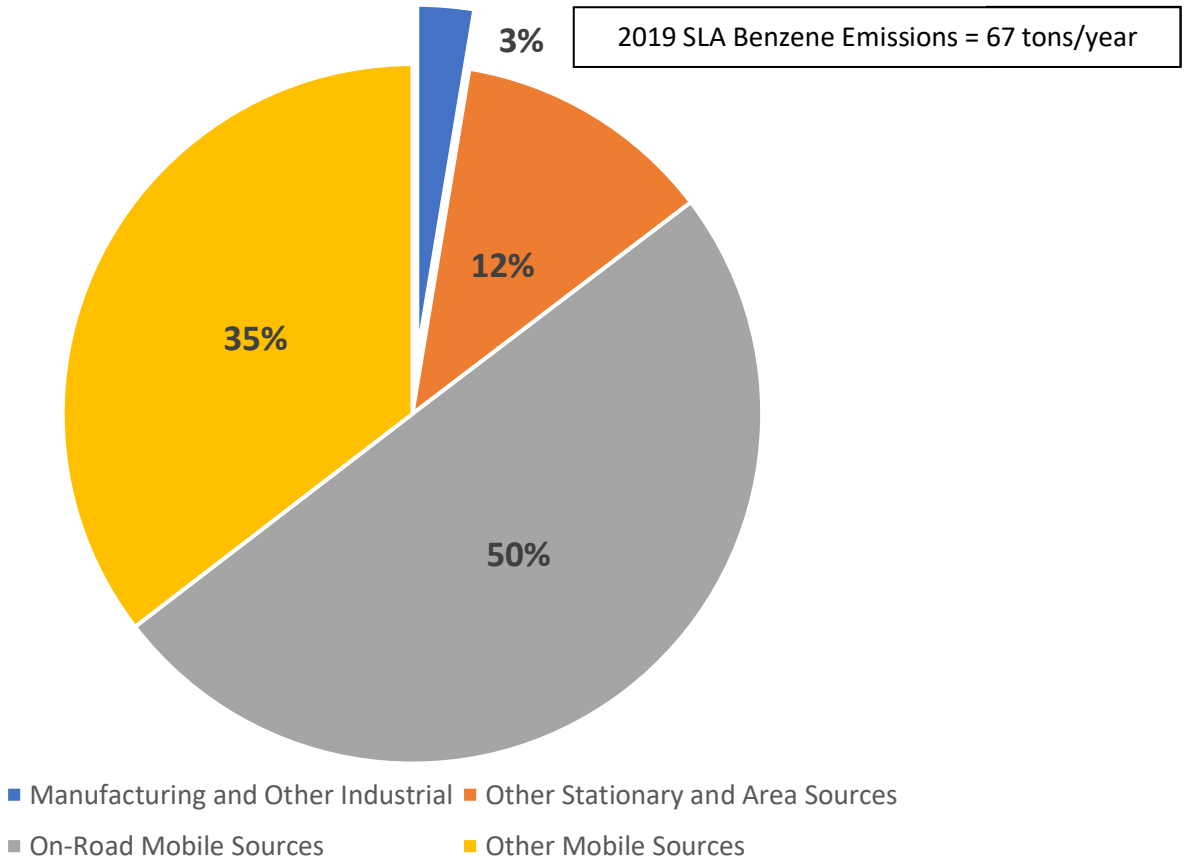
Figure A5d-5 shows that the emissions of 1,3-butadiene from chemical production and other industrial sources are projected to remain at similar levels in 2026 and 2031 at approximately 2.7 tpy, while the emissions from on-road mobile sources are projected to decrease as stricter vehicle emission standards are implemented. Overall emissions of 1,3-butadiene in SLA are projected to decrease from 12 tpy in 2019 to 10 tpy in 2031.

Figure A5d-5: Emissions of 1,3-Butadiene from Different Sources in SLA Between 2019 – 2031[6]



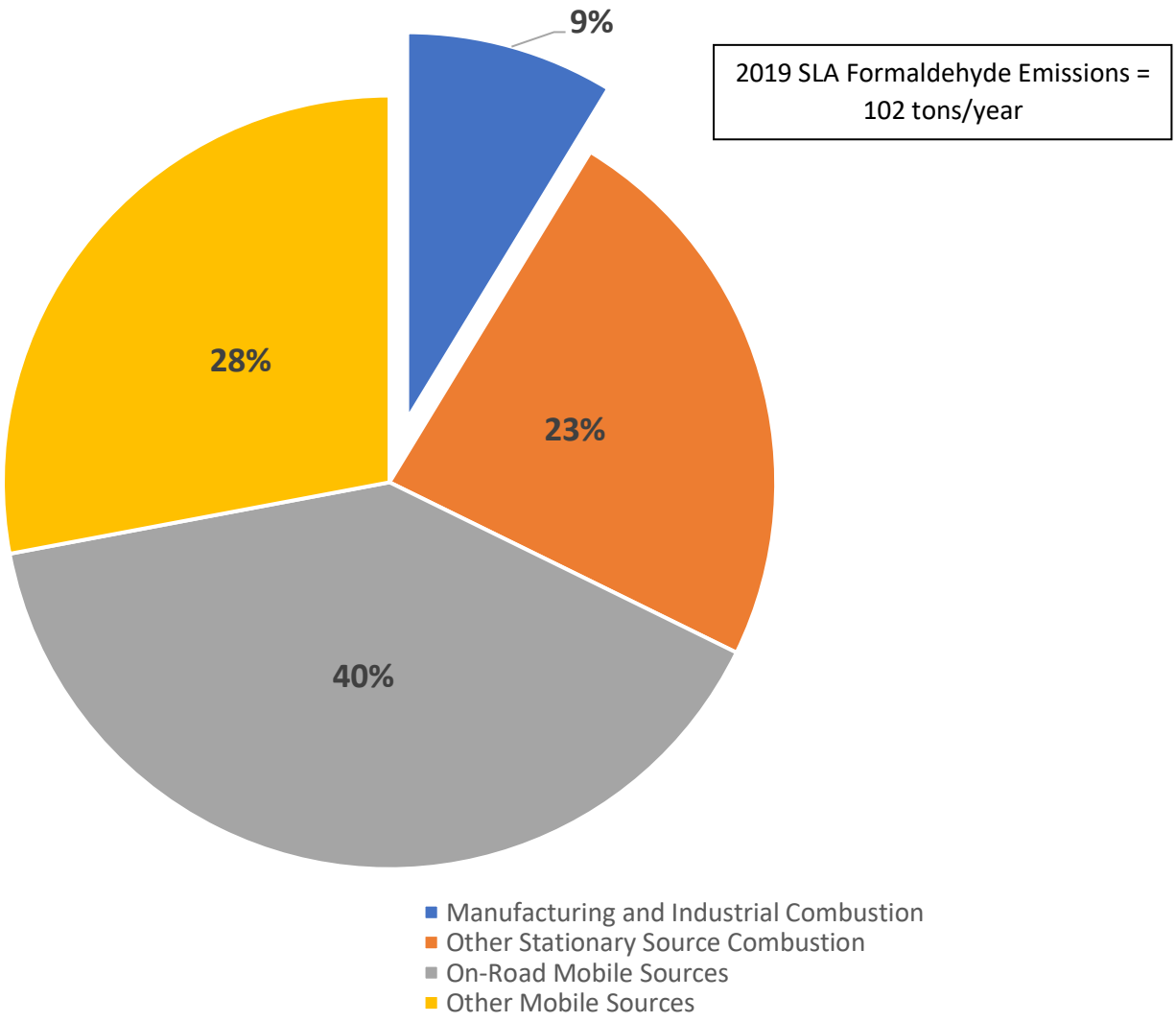
In the SLA community, fuel combustion at manufacturing and industrial facilities is an emission source of benzene, a carcinogenic VOC. Like 1,3-butadiene, emissions of benzene from SLA manufacturing and other industrial facilities are projected to remain at similar levels between 2019 and 2031 at approximately 2.2 tpy. Benzene emissions from manufacturing and industrial facilities remain a minor component (three percent) of overall benzene emissions in SLA which are dominated by mobile sources (**Figure A5d-6**). It should be noted that overall, benzene emissions in the SLA community are projected to decrease by 25 percent between 2019 and 2031 from 67 tpy to 51 tpy due to cleaner vehicle emissions.

Figure A5d-6: 2019 Relative Source Contribution to Benzene Emissions in SLA[6]



In 2019,[6] combustion at manufacturing and industrial facilities contributed approximately nine percent of all formaldehyde emissions in the SLA community, another VOC with carcinogenic properties albeit with lower levels of toxicity compared to benzene as shown in **Figure A5d7**. As with 1,3-butadiene and benzene, formaldehyde emissions from manufacturing and industrial sources are projected to remain at similar levels at between 2019 and 2031 at approximately 8.68 tpy with overall emissions decreasing by nearly 25 percent between 2019 and 2031 from 102 tpy to 77 tpy due to stricter vehicle emission standards.

Figure A5d-7: 2019 Relative Source Contribution to Formaldehyde Emissions in SLA[6]



Regulatory Efforts

Ongoing Efforts

South Coast AQMD's efforts to address this air quality priority in the SLA community include regulations, air monitoring, and enforcement activities to identify, characterize, and address emissions from general industrial facilities.

Regulatory Authority

South Coast AQMD

General Industrial is a broad category which covers community concerns that do not fit neatly into other categories identified by the CSC. General Industrial facilities have permitted equipment based on the particular equipment source categories such as gas stations, storage tanks, boilers, and heaters, as well as pollution control equipment such as afterburners and baghouses. Since this category can contain any number of facility types, the CSC input is crucial in prioritizing the facilities or industries. The numbers and rules cited for NOVs within this category vary widely and may not be indicative that a particular industry is "better" or "worse" than another, since the rules and permit conditions that apply can be different in each situation. General Industrial facilities that may emit TACs are regulated through individual source-specific rules that regulate coatings and solvents as well as Rules 1401[9] and 1402.[10] Rule 1401 limits the use of new permit units, relocations, or modifications to existing permit units that emit TACs and Rule 1402, which implements the Assembly Bill 2588 (AB 2588) Air Toxics "Hot Spots" program,[11,12] which reduces facility-wide health risk associated with emissions of TACs from existing sources that are over specific health risk thresholds. **Table A5d-2** provides an overview of additional South Coast AQMD rules which may apply to the concerns expressed by the SLA CSC involving general industrial facilities.

[9] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1402/par-1401-ph.pdf

[10] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf

[11] South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588

[12] For more information regarding the AB 2588 Program, please refer to Appendix 5a.

Table A5d-2: Examples of South Coast AQMD Rules Applicable to General Industrial Facilities[13]

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
109[14]	All Sources	VOC	• Recordkeeping for sources of VOCs when required by South Coast AQMD	• Owners or operators of stationary sources that conduct operations emitting VOCs	• Specified duration for retention of daily recordkeeping • Option for monthly recordkeeping, if applicable • Alternative recordkeeping system • Test methods
203[15]	All sources	All air contaminants	• Requires all operators to obtain a permit for any equipment that may emit air contaminants	• Any equipment that may cause emit air contaminants	• Obtain permits to operate • Comply with permit operating conditions
219[16,17]	All sources	All air contaminants	• Identify equipment, processes, or operations that emit small amounts of air contaminants that do not require written permits	Includes: • Mobile Equipment • Combustion Equipment • Building Infrastructure • Utility Equipment • Wood Processing Equipment • Miscellaneous process units	• Establishes provisions for equipment, operations, and processes to demonstrate permit exemption • Recordkeeping requirements pursuant to Rule 109 • Permits required for equipment under certain circumstances (e.g., equipment with a greater maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index risk than in Rule 1401[9])

[13] Since the General Industrial Facilities air quality priority is a general category that may address several of the CSC's concerns regarding varying types of facilities, the list of rules within Table A5d-2 is intended to provide examples of rules that may be applicable to the numerous facilities that may be categorized as "general industrial facilities." All facilities within South Coast AQMD's authority that have the potential to emit air pollutants through equipment operation or use of regulated products may be subject to a number of South Coast AQMD rules. For more information related to the entire suite of South Coast AQMD rules, please refer to: http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book.

[14] South Coast AQMD, Rule 109 – Recordkeeping for Volatile Organic Compound Emissions, http://www.aqmd.gov/docs/default-source/rule-book/reg-i/rule-109.pdf

[15] South Coast AQMD, Rule 203 – Permit to Operate, http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf

[16] South Coast AQMD, Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II, http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf

[17] This rule is applicable to a variety of industrial sources. For more information on this rule and its applicability, please refer to: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-219.pdf

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
401[18]	All sources	All air contaminants	• Prohibits certain visible emissions from most sources of any air contaminant	• Generally, any single source of emission that results in certain visible emissions (e.g., commercial charbroilers, diesel pile-driving hammers that can be found at oil and gas facilities or construction sites)	• Prohibits certain visible emissions
402[19]	All sources	All air contaminants	• Prohibit emissions from any source which cause injury or nuisance to the public or any considerable number of persons	• Any source whose emissions are deemed a nuisance to the public or any considerable number of persons	• Prohibit emissions from any source which cause injury or nuisance to the public or any considerable number of persons
403[20]	All sources	Particulate Matter (PM)	• Reduce amount of PM released into the air from fugitive dust sources	• Any activity or man-made condition capable of generating fugitive dust	• Prohibits visible emissions crossing property lines • PM10 limit • Prohibits track-out for a certain distance • Establishes 20 percent opacity limit • Best available control measures • Additional large operations requirements
1102[21]	Dry cleaning facilities	VOCs (non-PERC)	• Reduce VOC emissions from dry cleaning facilities not using perchloroethylene (PERC)	• Dry cleaning systems using solvent other than PERC	• Compliance schedule to cease operation of various equipment • Establishes requirements based on types of equipment used • Leak check and repair • Recordkeeping and reporting • Test methods

[18] South Coast AQMD, Rule 401 – Visible Emissions, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf

[19] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

[20] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf

[21] South Coast AQMD, Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1102-dry-cleaners-using-solvent-other-than-perchloreothylene.pdf

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
1107[22]	Coating of metal parts and products	VOCs	• Reduce VOC emissions from coating operations of metal parts and products	• All metal coatings operations except those performed on aerospace assembly, magnet wire, marine craft, motor vehicle, metal container, and coil coating operations	• Application of coating in accordance with manufacturer specifications • VOC limits • Disposal and cleaning • Analysis methods • Recordkeeping requirements for coating and solvent usage pursuant to Rule 109[14]
1110.2[23]	Gaseous- and liquid-fueled engines	CO, NOx, and VOCs	• Reduce CO, NOx, and VOCs from engines	• All stationary and portable engines over 50 rated brake horsepower	• Emissions standards • Compliance schedule • Monitoring, testing, recordkeeping, and reporting • Test methods
1124[24]	Aerospace assembly and component manufacturing operations	VOCs	• Reduce VOCs from aerospace assembly and component manufacturing operations	• Aerospace assembly and component manufacturing operations	• VOC content limits • Solvent cleaning operations requirements • Requirements for storage and disposal of VOC-containing materials • Recordkeeping pursuant to Rule 109[14] • Test methods • Reporting
1136[25]	Coating or strippers to, and surface preparation of, wood products	VOCs	• Reduce VOC emissions from the application of coatings or strippers to, and surface preparations of, wood products	• Operations involving the coating or strippers to, and surface preparation of, wood products	• VOC content limits of coatings and strippers • Allows control devices in lieu of complying with VOC limits • Recordkeeping • Prohibition of specifications • Test methods • Continuous monitors • Progress reports

[22] South Coast AQMD, Rule 1107 – Coating of Metal Parts and Products, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1107.pdf
[23] South Coast AQMD, Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf
[24] South Coast AQMD, Rule 1124 – Aerospace Assembly and Component Manufacturing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1124.pdf
[25] South Coast AQMD, Rule 1136 – Wood Product Coatings, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1136.pdf

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
1146[26] **1146.1**[27] **1146.2**[28]	Boilers, steam generators, process heaters, water heaters	NOx	• Reduce NOx emissions	• Boilers • Steam Generators • Process Heaters • Water heaters	• NOx emission limits • Establishes requirements for determining compliance • Certain equipment is subject to manufacturer certifications and progress reports
1147[29]	Miscellaneous sources	NOx	• Reduce NOx emissions from combustion equipment that require a permit	• Manufacturers, distributors, retailers, installers, owners, and operators of ovens, dryer, kilns, etc., and other combustion equipment with NOx emissions that require a permit	• NOx emission limits • Recordkeeping requirements
1155[30]	Pollution control equipment for PM	PM	• Establish requirements for permitted PM pollution control devices	• Permitted PM air pollution control devices ○ Baghouses ○ High Efficiency Particulate Air (HEPA) Systems ○ Bin Vents ○ Dust collectors	• Visible emission, monitoring, recordkeeping requirements • Certain equipment installation requirements
1166[31]	VOC-contaminated soils	VOCs	• Reduce VOCs due to operations involving disturbing or handling of VOC-contaminated soils	Operations involving the VOC-contaminated soil: • Excavating • Grading • Handling • Treating	• Require mitigation plans • Monitoring requirements • Best management practices • Test methods

[26] South Coast AQMD, Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146.pdf

[27] South Coast AQMD, Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf

[28] South Coast AQMD, Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf

[29] South Coast AQMD, Rule 1147 – NOx Reductions from Miscellaneous Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1147.pdf

[30] South Coast AQMD, Rule 1155 – Particulate Matter (PM) Control Devices, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1155.pdf

[31] South Coast AQMD, Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
1401[99]	All new, relocated, and modified sources	TACs as listed by the California Office of Environmental Health Hazard Assessment (OEHHA)	• Specifies limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit TACs	• Applications for new, relocated, and modified permit units	• Denial of permit to construct a new, relocated, or modified permit unit if emissions of any TAC would cause an increase in maximum individual cancer risk and burden, and exceedance of hazard index over a certain level
1402[1010]	Existing sources	TACs (OEHHA)	• Reduce health risk associated with emissions of TACs from existing sources	• Any facility notified by Executive Officer to prepare an Air Toxics Inventory Report, Health Risk Assessment, or Risk Reduction Plan or is subject to the Hot Spots Act (AB 2588)	• Inventory and emissions reporting • Public notification, if applicable • Risk reduction, if applicable
1421	Dry cleaning systems	PERC	• Reduce emissions of PERC from dry cleaning systems	• Dry Cleaners using PERC	• Transition from PERC to alternative cleaning technologies by December 31, 2020
1466[32]	Soils contaminated with TACs	PM, TACs	• Reduce emissions of PM/TACs from earth-moving activities of soils contaminated with TACs	• Earth-moving activities involving soils contaminated with TACs from designated sites	• PM limit • Monitoring, signage, recordkeeping and notification • Best management practices to minimize fugitive dust emissions with alternative provisions
1470[33]	Stationary diesel-fueled internal combustion and other compression ignition engines	Diesel Particulate Matter (DPM), Non-Methane Hydrocarbons (NMHC)+NOx, CO	• Sets NMHC+NOx, CO, and DPM emission standards for stationary compression ignition engines rated greater than 50 brake horsepower	• Compression ignition engines, including diesel-fueled internal combustion engines	• Limits operational hours when near sensitive receptors • Recordkeeping, reporting, and monitoring • Fuel standards • Emissions testing and test methods • Operating requirements • Sets NMHC+NOx, CO, and DPM emissions standards

[32] South Coast AQMD, Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

[33] South Coast AQMD, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

Other Government Agencies and their Authority

Other concerns raised by the community during CERP development included, but were not limited to, the following:

- Proximity of operations and/or sources to residents and sensitive receptors
- Disposal of hazardous waste
- Pallet businesses
- Requirements for signage to describe chemicals used on site
- Illegal dumping
- Fireworks
- Noise violations
- Airplane exhaust

Several governmental agencies have varying authority to address these concerns. **Table A5d-3** generally describes which governmental agency has authority to address concerns raised during the CERP development process. As part of this CERP, South Coast AQMD commits to working with the appropriate agencies to address issues that fall outside its authority.

Table A5d-3: CSC Concerns and Responsible Agency Authority

CSC Concern	Appropriate Agency*	Authority
Proximity[34] of operations and/or sources to residents and sensitive receptors	• City Planning (Los Angeles, Inglewood, Compton, and Lynwood) or Los Angeles County (LA County) Department of Regional Planning • Los Angeles County, Los Angeles, Inglewood, Compton, and Lynwood Departments of Public Works (DPW)	• City and county planning departments establish zones and issue permits for residential development and commercial and industrial uses • DPW provides building permits through the enforcement of the City's and County's building codes and regulations
Disposal of hazardous waste	California Department of Toxic Substances Control	• Inspects permitted facilities for compliance with hazardous waste treatment, storage, and disposal requirements • Investigates illegal hazardous waste activity complaints • Coordinates enforcement activities with California EPA, California Certified Unified

[34] South Coast AQMD does not have authority over land use decisions. Cities and counties have authority over land use decisions and establish zoning and issue land use permits for residential, commercial, and industrial uses. A facility's proximity to a sensitive receptor is taken into consideration by South Coast AQMD during the health risk assessment process.

CSC Concern	Appropriate Agency*	Authority
		Program Agencies (CUPA), and other appropriate agencies
Pallet businesses	• City Planning (Los Angeles, Inglewood, Compton, and Lynwood) or County Department of Regional Planning • LA County, Los Angeles, Inglewood, Compton, and Lynwood DPW	• City and county planning departments establish zones and issue permits for residential development and commercial and industrial uses • DPW provides building permits through the enforcement of the City's and County's building codes and regulations
Requirements for signage to describe chemicals used on site	• United States Occupational Safety and Health Administration (OSHA) • California OSHA (Cal/OSHA) • County of Los Angeles Fire Department (LACoFD) CUPA[35] • Los Angeles City Fire Department	• OSHA establishes Hazard Communication Standard (HCS) to ensure chemical safety in the workplace[36] • Cal/OSHA establishes the Hazard Communication Regulation to serve as a guide for safety in the workplace[37] • LACoFD establishes requirements for posting of appropriate warning signs for chemicals and hazardous waste[38] • Los Angeles City Fire Department (LAFD) establishes requirements for hazardous materials
Illegal dumping	• City (Los Angeles, Inglewood, Compton, and Lynwood) or Los Angeles County • LA County DPW • LA County Sheriff's Department	• Cities and counties establish ordinances to respond to illegal dumping activities • LA County DPW oversees illegal dumping and penalties[39] • LA County Sheriff's Department may seize vehicles engaging in illegal dumping[40]

[35] In addition to the unincorporated areas of Los Angeles County, the LACoFD CUPA also establishes requirements for incorporated areas of Lynwood and Compton for chemicals and hazardous materials.

[36] OSHA, Hazard Communication, https://www.osha.gov/hazcom

[37] Cal/OSHA, The Cal/OSHA Hazard Communication Regulation, https://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf

[38] LA County Fire Department Health Hazardous Materials Division, Compliance Guidelines for Hazardous Wastes and Materials, https://fire.lacounty.gov/wp-content/uploads/2019/09/HHMD-Compliance-Guidance-Document-2-1.pdf

[39] LA County Department of Public Works, Code of Ordinances – Illegal Dumping, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT13PUPEMOWE_DIV10MOVESEFO_CH13.80ILDU

[40] LA County Sheriff's Department may enforce county ordinances related to illegal dumping for unincorporated areas of LA County.

CSC Concern	Appropriate Agency*	Authority
Fireworks**	• City or County Fire Departments • City or County Police Departments	• LA County Fire Code[41,42] states that it is illegal to store, manufacture, sell, use, or handle ALL FORMS of fireworks without a valid permit in unincorporated areas of LA County
Noise violations	• City or County Police Departments	• Local police departments have authority to enforce local ordinances related to noise[43]
Airplane exhaust	• Federal Aviation Administration (FAA) • United States Environmental Protection Agency (U.S. EPA)	• FAA sets engine emission certification requirements for civil airplane manufacturers[44] • U.S. EPA adopted greenhouse gasses (GHG) emission standards that apply to all large passenger jets[45]

*If "city" is listed, this includes each separate city agency with land use authority within the SLA community boundary (i.e., City of Los Angeles, City of Compton, City of Lynwood, City of Inglewood). L A County has land use authority for all other unincorporated areas (e.g., Willowbrook, Westmont).

**South Coast AQMD conducts PM and multi-metals air monitoring and analysis during Independence Day fireworks.[46] In addition, U.S. EPA requires South Coast AQMD to prepare an Exceptional Events Mitigation Plan for Independence Day fireworks.[47]

Air Monitoring

Emissions from general industrial facilities may cause odors and emit a wide variety of particulate and gaseous air pollutants such as PM, benzene, and other VOCs. South Coast AQMD rules and permit requirements have provisions to limit the emissions of these contaminants. South Coast AQMD's monitoring strategy to address this air quality priority consists of conducting initial measurement surveys near general industrial facilities to identify any elevated levels of pollutants and characterize any emissions from these facilities. There are approximately 354 general industrial facilities within the SLA community boundary emitting a wide variety of air pollutants depending on the type of facility, operation, and process(es) considered. Therefore, South Coast AQMD's surveys will focus only on those facilities and areas identified and prioritized

[41] California Code of Regulations, Title 32, Section 5601.3

[42] Los Angeles County Fire Department, Fireworks Safety, https://fire.lacounty.gov/fireworks-safety-and-july-4th-celebration-information/#:~:text=The%20County%20of%20Los%20Angeles,areas%20of%20Los%20Angeles%20County.

[43] Los Angeles Police Department, Noise Enforcement Team, https://www.lapdonline.org/office-of-the-chief-of-police/professional-standards-bureau/criminal-investigation-division/noise-enforcement-team/

[44] FAA, Engine Emissions Certification, https://www.faa.gov/air_traffic/noise_emissions/emission_certification/

[45] U.S. EPA, EPA Finalizes Airplane Greenhouse Gas Emission Standards, https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P1010TFZ.txt

[46] South Coast AQMD, 2021 Independence Day Air Quality Assessment, http://www.aqmd.gov/home/air-quality/air-quality-studies/special-monitoring/independence-day-fireworks/independence-day-fireworks-2021

[47] U.S. EPA, Exceptional Events Rule and Mitigation Plan, https://www.epa.gov/air-quality-analysis/final-2016-exceptional-events-rule-supporting-guidance-documents-updated-faqs#final

by the CSC and will initially rely on mobile monitoring using available advanced air monitoring technologies. Measurements will be made downwind from these facilities and concurrent measurement of wind speed and direction during surveys will be used to help identify possible sources of emissions. Findings from these initial surveys will be used to determine whether additional measurements are needed (e.g., fixed monitoring, collection of samples for laboratory analysis, other ad-hoc strategies).

Compliance and Enforcement

Compliance and enforcement information for SLA general industrial facilities is available in Chapter 4: Enforcement Overview and History and Appendix 4: Enforcement Overview and History.

South Coast AQMD inspectors regularly conduct enforcement activities at general industrial facilities within SLA. These activities fall into two categories:

- Those initiated by South Coast AQMD, such as routine facility inspections or targeted rule inspections.
- Those prompted by outside parties, such as, complaint investigations, facility notifications, and agency referrals.

While there are many reasons to conduct an inspection, air pollution concerns received directly from community members through public complaints are a very important source of information. All complaints received are assigned to an inspector for investigation. The complaint telephone line is handled by a live attendant during business hours (Monday to Friday) or by a standby system during non-business hours. Complaint information is kept confidential. While anonymous complaints are accepted, providing contact information is crucial for the inspector to be able to gather any relevant information to conduct an effective investigation. **To report complaints, community members can call 1-800-CUT-SMOG (1-800-288-7664) or file an online complaint at https://www.aqmd.gov/home/air-quality/complaint.**

Inspections are generally unannounced so that the inspector can observe a facility conducting normal operations. Inspections can be conducted to evaluate the overall compliance status of the facility or focus on specific aspects of an operation to ensure the facility is following a specific rule or regulation. Different types of facilities may be required to abide by specific applicable rules; therefore, inspectors will verify compliance with all rules, regulations, and permit conditions that are relevant to a facility.

If a facility is determined to be out of compliance with air pollution rules or regulations or permit conditions, inspectors will take necessary enforcement action to address the non-compliant activity. There are two types of enforcement actions:

1. A Notice to Comply (NC) may be issued for minor violations found during an inspection or to request additional information.

2. A Notice of Violation (NOV) may be issued for violations of rules or permit conditions. NOVs usually result in a penalty.

If a facility cannot immediately comply with air pollution laws, it may seek a variance from a rule requirement or permit condition by filing a petition and appearing before the South Coast AQMD Hearing Board.[48] In cases of ongoing noncompliance, a petition for an Order for Abatement may be brought against the facility, which will seek to require the company to take specific actions or cease operating in violation of South Coast AQMD rules or regulations. These processes serve to ensure that a facility can return to compliance expeditiously while minimizing air quality impacts.

Since general industrial facilities have been identified as a community priority, Assembly Bill 617 CERP actions include enhanced enforcement efforts intended to address SLA community concerns directly, taking community input into account where appropriate. Enhanced enforcement efforts include the actions identified in Chapter 5d: General Industrial Facilities.

Incentives

For information related to incentives, please refer to Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

[48] Please refer to Appendix 4 for more information regarding the South Coast AQMD Hearing Board.

Appendix 5e

Metal Processing Facilities

Introduction

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for this Community Emissions Reduction Plan (CERP). One of the concerns raised by the South Los Angeles (SLA) CSC is metal processing facilities, in particular the health effects from emissions of criteria air pollutants, toxic air contaminants (TACs), and strong odors. This appendix provides additional supporting information for Chapter 5e: Metal Processing Facilities, including an overview of applicable facilities, emissions, and regulatory efforts. The overview of regulatory efforts includes a summary of regulatory authority, air monitoring, compliance and enforcement, and incentive efforts in addressing emissions from and exposure to metal processing facilities.

Community Impacts from Metal Processing Facilities

There are about 69 metal processing facilities[1] within the SLA community that operate under South Coast Air Quality Management District (AQMD) rules and regulations. Metal processing facilities in SLA conduct various metal operations such as heating, heat treating, melting, plating, machining, forging, grinding, and recycling. Most metal recyclers and metal scrap yards do not have equipment that require air quality permits, but may still be subject to some South Coast AQMD rules such as Rule 403[2] for control of fugitive dust emissions. See **Figure A5e-1** for examples of operations at metal processing facilities. Additionally, Appendix 4: Enforcement Overview and History provides more information on the categories of facilities related to this air quality priority.

[1] The total number of facilities applicable to this air quality priority was arrived at using multiple sources, such as permit type, technical specialty (TS) number, and NAICS codes. TS refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

[2] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf

Figure A5e-1: Examples of Metal Processing Activities

Metal Melting

Metal Plating

Metal Grinding

Metal Recycling

Metal Forging

Metal Heat Treating

In Chapter 4: Enforcement Overview and History, South Coast AQMD provided an overview of the distribution of types of metals facilities within SLA, based on North American Industry Classification System (NAICS) codes. This distribution is provided again below in **Figure A5e-2** with descriptions of each NAICS code in **Table A5e-1**.[3]

[3] The NAICS designation is not provided by South Coast AQMD. Rather, the NAICS designation is provided by the owner or operator within the permit application submitted to South Coast AQMD for any applicable equipment.

Figure A5e-2: Distribution of Metals Facility Types within SLA01

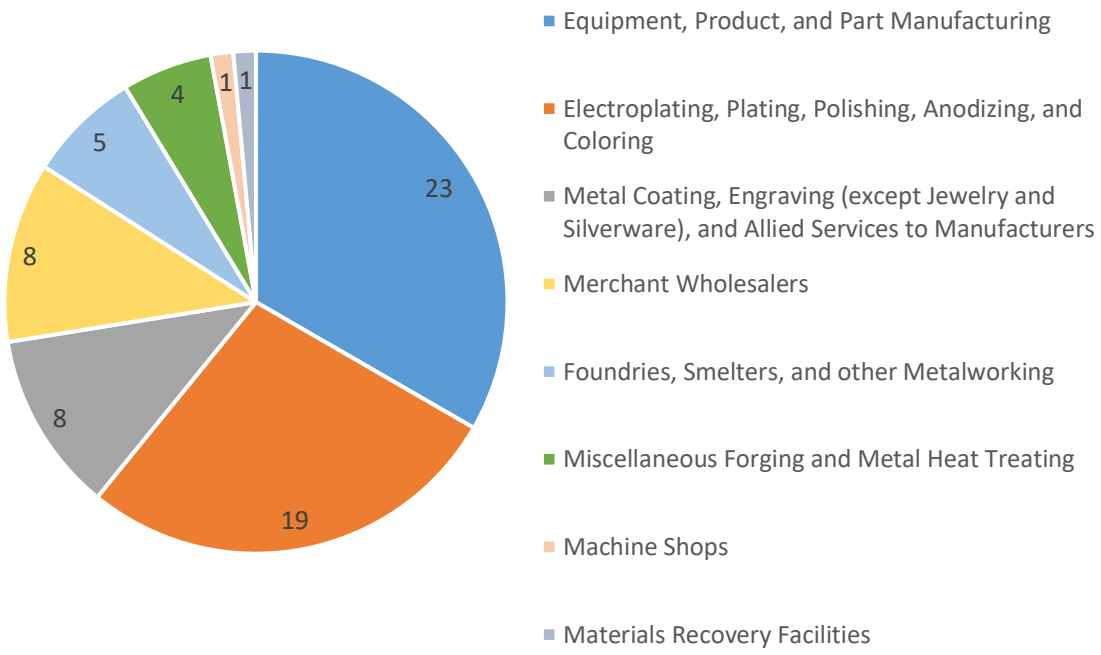


Table A5e-1: NAICS Descriptions and Number of Facilities for SLA Metals Facility Types[4]

Metals Facility Type	Applicable NAICS Code(s)	NAICS Industry Title	Number of Facilities in SLA	NAICS Industry Description
Equipment, Product, and Part Manufacturing	332312	Fabricated Structural Metal Manufacturing	4	Facilities primarily engaged in fabricating structural metal products, such as assemblies of concrete reinforcing bars and fabricated bar joists.
	337215	Showcase, Partition, Shelving, and Locker Manufacturing	3	Facilities primarily engaged in manufacturing wood and non-wood office and store fixtures, shelving, lockers, frames, partitions, and related fabricated products of wood and non-wood materials, including plastics laminated fixture tops. The products are made on a stock or custom basis and may be assembled or unassembled (i.e., knockdown). Includes facilities

[4] United States Census Bureau, North American Industry Classification System, https://www.census.gov/naics/

Metals Facility Type	Applicable NAICS Code(s)	NAICS Industry Title	Number of Facilities in SLA	NAICS Industry Description
				exclusively making furniture parts (e.g., frames).
	332323	Ornamental and Architectural Metal Work Manufacturing	2	Facilities primarily engaged in manufacturing ornamental and architectural metal work, such as staircases, metal open steel flooring, fire escapes, railings, and scaffolding.
	336413	Other Aircraft Parts and Auxiliary Equipment Manufacturing	2	Facilities primarily engaged in 1) manufacturing aircraft parts or auxiliary equipment (except engines and aircraft fluid power subassemblies) and/or 2) developing and making prototypes of aircraft parts and auxiliary equipment. Auxiliary equipment includes such items as crop dusting apparatus, armament racks, inflight refueling equipment, and external fuel tanks.
	333991	Power-Driven Handtool Manufacturing	1	Facilities primarily engaged in manufacturing power-driven (e.g., battery, corded, pneumatic) handtools, such as drills, screwguns, circular saws, chain saws, staplers, and nailers.
	332313	Plate Work Manufacturing	1	Facilities primarily engaged in manufacturing fabricated metal plate work by cutting, punching, bending, shaping, and welding purchased metal plate.
	33299	All Other Fabricated Metal Product Manufacturing	1	Facilities primarily engaged in manufacturing fabricated metal products (except forgings and stampings, cutlery and handtools, architectural and structural metals, boilers, tanks, shipping containers, hardware, spring and wire products, machine shop products, turned products, screws, nuts and bolts, metal valves, ball and roller bearings, ammunition, small arms and other ordnances and accessories, and fabricated pipes and pipe fittings).
	3363	Motor Vehicle Parts Manufacturing	1	Facilities primarily engaged in manufacturing and/or rebuilding motor vehicle parts and accessories (except

Metals Facility Type	Applicable NAICS Code(s)	NAICS Industry Title	Number of Facilities in SLA	NAICS Industry Description
				motor vehicle gasoline engines and engine parts, motor vehicle electrical and electronic equipment, motor vehicle steering and suspension components, motor vehicle brake systems, motor vehicle transmissions and power train parts, motor vehicle seating and interior trim, and motor vehicle stampings).
	333517	Machine Tool Manufacturing	1	Facilities primarily engaged in 1) manufacturing metal cutting machine tools (except handtools) and/or 2) manufacturing metal forming machine tools (except handtools), such as punching, sheering, bending, forming, pressing, forging and die-casting machines.
	332117	Powder Metallurgy Part Manufacturing	1	Facilities primarily engaged in manufacturing powder metallurgy products using any of the various powder metallurgy processing techniques, such as pressing and sintering or metal injection molding. Includes facilities that generally make a wide range of parts on a job or order basis.
	332912	Fluid Power Valve and Hose Fitting Manufacturing	1	Facilities primarily engaged in manufacturing fluid power valves and hose fittings.
	332618	Other Fabricated Wire Product Manufacturing	1	Facilities primarily engaged in manufacturing fabricated wire products (except springs) made from purchased wire.
	337124	Metal Household Furniture Manufacturing	1	Facilities primarily engaged in manufacturing metal household-type furniture and freestanding cabinets. The furniture may be made on a stock or custom basis and may be assembled or unassembled (i.e., knockdown).
	333249	Other Industrial Machinery Manufacturing	1	Facilities primarily engaged in manufacturing industrial machinery (except agricultural and farm-type; construction and mining machinery;

Metals Facility Type	Applicable NAICS Code(s)	NAICS Industry Title	Number of Facilities in SLA	NAICS Industry Description
				food manufacturing-type machinery; semiconductor making machinery; sawmill, woodworking, and paper making machinery; and printing machinery and equipment).
	333515	Cutting Tool and Machine Tool Accessory Manufacturing	1	Facilities primarily engaged in manufacturing accessories and attachments for metal cutting and metal forming machine tools.
	332919	Other Metal Valve and Pipe Fitting Manufacturing	1	Facilities primarily engaged in manufacturing metal valves (except industrial valves, fluid power valves, fluid power hose fittings, and plumbing fixture fittings and trim).
Electroplating, Plating, Polishing, Anodizing, and Coloring	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	19	Facilities primarily engaged in electroplating, plating, anodizing, coloring, buffing, polishing, cleaning, and sandblasting metals and metal products for the trade. Includes facilities that perform these processes on other materials, such as plastics, in addition to metals.
Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	8	Facilities primarily engaged in one or more of the following: 1) enameling, lacquering, and varnishing metals and metal products; 2) hot dip galvanizing metals and metal products; 3) engraving, chasing, or etching metals and metal products (except jewelry; personal goods carried on or about the person, such as compacts and cigarette cases; precious metal products (except precious plated flatware and other plated ware); and printing plates); 4) powder coating metals and metal products; and 5) providing other metal surfacing services for the trade. Includes facilities that perform these processes on other materials, such as plastics, in addition to metals.
Merchant Wholesalers	423830	Industrial Machinery and Equipment	3	Facilities primarily engaged in the merchant wholesale distribution of specialized machinery, equipment, and

Metals Facility Type	Applicable NAICS Code(s)	NAICS Industry Title	Number of Facilities in SLA	NAICS Industry Description
		Merchant Wholesalers		related parts generally used in manufacturing, oil well, and warehousing activities.
	423510	Metal Service Centers and Other Metal Merchant Wholesalers	3	Facilities primarily engaged in the merchant wholesale distribution of products of the primary metals industries. Service centers maintain inventory and may perform functions, such as sawing, shearing, bending, leveling, cleaning, or edging, on a custom basis as part of sales transactions.
	423930	Recyclable Material Merchant Wholesalers	2	Facilities primarily engaged in the merchant wholesale distribution of automotive scrap, industrial scrap, and other recyclable materials. Includes facilities that are auto wreckers primarily engaged in dismantling motor vehicles for the purpose of wholesaling scrap.
Foundries, Smelters, and Other Metalworking	331491	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding	2	Facilities primarily engaged in 1) rolling, drawing, or extruding shapes (e.g., bar, plate, sheet, strip, tube) from purchased nonferrous metals and/or 2) recovering nonferrous metals from scrap and rolling, drawing, and/or extruding shapes (e.g., bar, plate, sheet, strip, tube) in integrated mills.
	331513	Steel Foundries (except Investment)	1	Facilities primarily engaged in manufacturing steel castings (except steel investment castings). Includes facilities that purchase steel made in other facilities.
	331314	Secondary Smelting and Alloying of Aluminum	1	Facilities primarily engaged in 1) recovering aluminum and aluminum alloys from scrap and/or dross (i.e., secondary smelting) and making billet or ingot (except by rolling) and/or 2) manufacturing alloys, powder, paste, or flake from purchased aluminum.
	331529	Other Nonferrous Metal	1	Facilities primarily engaged in pouring molten nonferrous metals (except aluminum) into molds to manufacture

Metals Facility Type	Applicable NAICS Code(s)	NAICS Industry Title	Number of Facilities in SLA	NAICS Industry Description
		Foundries (except Die-Casting)		nonferrous castings (except nonferrous die-castings and aluminum castings). Includes facilities in this industry purchase nonferrous metals, such as copper, nickel, lead, and zinc, made in other facilities.
Miscellaneous Forging and Metal Heat Treating	332112	Nonferrous Forging	2	Facilities primarily engaged in manufacturing nonferrous forgings from purchased nonferrous metals by hammering mill shapes. Includes facilities making nonferrous forgings and further manufacturing (e.g., machining, assembling) a specific manufactured product is classified in the industry of the finished product. Nonferrous forging facilities may perform surface finishing operations, such as cleaning and deburring, on the forgings they manufacture.
	332811	Metal Heat Treating	2	Facilities primarily engaged in heat treating, such as annealing, tempering, and brazing, and cryogenically treating metals and metal products for the trade.
Machine Shops	33271	Machine Shops	1	Facilities known as machine shops primarily engaged in machining metal and plastic parts and parts of other composite materials on a job or order basis. Generally, machine shop jobs are low volume using machine tools, such as lathes (including computer numerically controlled); automatic screw machines; and machines for boring, grinding, milling, and additive manufacturing.
Materials Recovery Facilities	562920	Materials Recovery Facilities	1	Facilities primarily engaged in 1) operating facilities for separating and sorting recyclable materials from nonhazardous waste streams (i.e., garbage) and/or 2) operating facilities where commingled recyclable materials, such as paper, plastics, used beverage cans, and metals, are sorted into distinct categories.
		Total	**69**	

Emissions from Metal Processing Facilities

Emissions information for metal processing facilities in SLA is available in Chapter 2d: Emissions and Source Attribution Analysis and Appendix 2d: Source Attribution. Emissions from metal processing operations primarily come from two sources:

1. the point source (e.g., metal melting furnace, electroplating tank, billet grinder) and
2. fugitive metal particulate emissions.

In general, fugitive metal particulate emissions are any emissions not captured in a pollution control device, and if not properly controlled, fugitive metal particulate emissions can accumulate on surfaces in and around the facility, and has the potential to become airborne. Fugitive metal particulate emissions can be generated from crushing, grinding, plating, and handling of materials.

Metal TACs of concern include arsenic, cadmium, hexavalent chromium, lead, and nickel. **Table A5e-2** provides the California Office of Environmental Health Hazard Assessment (OEHHA) carcinogenic classifications of these metals and designations for the organs they target. These carcinogenic values were developed by OEHHA under the Toxic Air Contaminant Program mandated by Assembly Bill 1807.[5] The program is implemented in conjunction with the California Air Resources Board (CARB) and requires OEHHA to evaluate health risk from exposure to TACs. OEHHA released the public and peer-reviewed Air Toxics Hot Spots Program Risk Assessment Guidelines[6] focused on noncancer risk, cancer risk, and exposure assessment. The methodologies contained in the Guidelines seek to develop more representative estimates of the potential risk of exposure based on hazard identification, exposure assessment, dose-response assessment, and risk characterization. Substances proposed for identification as a TAC by CARB and OEHHA are subsequently evaluated by the Scientific Review Panel[7] by considering underlying scientific data such as clinical data from experimental studies in animals and acute exposure in humans as well as by exposure and health assessment reports prepared by CARB and OEHHA. Some metal particulates with carcinogenic health effects have multiple pathways of entering the body which elevates the health risks compared to other TACs, underscoring the importance that operations with TAC metal particulate emissions be well controlled.

[5] CARB, Assembly Bill 1807 – Toxics Air Contaminant Identification and Control, https://ww2.arb.ca.gov/resources/documents/ab-1807-toxics-air-contaminant-identification-and-control#:~:text=The%20Toxic%20Air%20Contaminant%20Identification%20and%20Control%20Act,risk%20identification%2C%20and%202%29%20risk%20management.%20Risk%20Identification

[6] OEHHA, Notice of Adoption of Air Toxics Hot Spots Program Guidance Manual, https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0

[7] CARB, Scientific Review Panel on Toxic Air Contaminants, https://ww2.arb.ca.gov/resources/documents/scientific-review-panel-toxic-air-contaminants

Table A5e-2: Potential Health Impacts of Metals

Metal	United States Environmental Protection Agency (U.S. EPA) Carcinogenic Classification[8]	OEHHA Chronic Exposure Routes and Target Organs[9]
Arsenic	Carcinogenic to Humans	• Inhalation and Oral: Development; cardiovascular system; nervous system; respiratory system; skin
Cadmium	Likely to be Carcinogenic to Humans	• Inhalation: Kidney; respiratory system • Oral: Kidney
Hexavalent Chromium	Carcinogenic to Humans	• Inhalation: Respiratory system • Oral: Hematologic system
Lead	Likely to be Carcinogenic to Humans	• Inhalation and Oral: Cardiovascular system; kidney; reproductive system; nervous system[10,11]
Nickel	Carcinogenic to Humans	• Inhalation: Respiratory system; hematologic system • Oral: Development

Arsenic and cadmium may be found as contaminants in pure metals and their alloys, such as aluminum and aluminum alloys, carbon steel, brass, bronze, and some chromium non-ferrous alloys. Chronic arsenic exposure is associated with respiratory cancer when inhaled and skin cancer when orally ingested.[12] Shorter arsenic inhalation exposure can lead to decreased intellectual function in children.[13] Chronic inhalation or oral exposure to cadmium leads to a build-up of cadmium in the kidneys that can cause kidney disease. Other effects from chronic exposure of humans to cadmium in air are effects on the lung, including bronchiolitis and emphysema.[14]

[8] U.S. EPA, Risk Assessment for Carcinogenic Effects, https://www.epa.gov/fera/risk-assessment-carcinogenic-effects

[9] OEHHA, Acute, 8-hour and Chronic Reference Exposure Level (REL) Summary, https://oehha.ca.gov/air/general-info/oehha-acute-8-hour-and-chronic-reference-exposure-level-rel-summary

[10] OEHHA, Public Health Goals for Chemicals in Drinking Water – Lead, https://oehha.ca.gov/media/downloads/water/chemicals/phg/leadfinalphg042409.pdf

[11] OEHHA, Appendix A: Hot Spots Unit Risk and Cancer Potency Values, Updated October 2020, https://oehha.ca.gov/media/downloads/crnr/appendixa.pdf

[12] OEHHA, Technical Support Document for Cancer Potency Factors – Appendix B, https://oehha.ca.gov/media/downloads/crnr/appendixb.pdf

[13] OEHHA, Technical Support Document for Noncancer RELs – Appendix D, https://oehha.ca.gov/media/downloads/crnr/appendixd1final.pdf

[14] U.S. EPA, Cadmium Compounds, https://www.epa.gov/sites/default/files/2016-09/documents/cadmium-compounds.pdf

Chromium and nickel are commonly added to metals to provide qualities such as corrosion resistance or strength. When chromium-containing metals (e.g., stainless steel, alloy steels, superalloys) undergo high-temperature processes such as melting, forging, or heat treating, the chromium in the metal can oxidize to form hexavalent chromium. Hexavalent chromium is also released from mists generated from the deposition of chromium onto a surface during electroplating or using chromic acid to increase the natural oxide layer of a metal surface during anodizing. Chronic exposure to hexavalent chromium can result in increased risk of lung cancer through inhalation and can cause stomach cancer through oral ingestion.[8] Non-cancer health effects of being exposed to hexavalent chromium at high levels over time can cause or worsen health conditions such as irritation of the nose, throat, and lungs; allergic symptoms (wheezing, shortness of breath); and nasal sores and perforation of the membrane separating the nostrils (for example, at very high air levels in workplaces).[15] Chronic nickel inhalation can increase risk for lung and nasal sinus cancers.[8] Acute (one-hour) inhalation of nickel can suppress the immune system.[16] Oral ingestion of nickel can also lead to reproductive and developmental toxicities.[8]

Lead is classified as a "criteria pollutant" under the federal Clean Air Act. Lead does not degrade, therefore previous uses of lead and its releases into the ambient air result in high concentration of lead that persist in the environment. Lead-containing materials include lead alloys, brass, bronze, lead-oxide, and lead-acid batteries. Lead exposure can occur directly through inhalation, or indirectly by ingestion of lead-contaminated food, water, or other materials including dust and soil. Chronic impacts from lead exposure include nervous and reproductive system disorders, neurological and respiratory damage, cognitive and behavior changes, and hypertension.[17] Lead has not been adequately shown to be carcinogenic in humans, but has been shown in animal studies to cause kidney tumors following oral exposure.[8]

Regulatory Efforts

Ongoing Efforts

South Coast AQMD's efforts to address this air quality priority in the SLA community include regulations, permits with enforceable conditions and emissions limits, air monitoring, and enforcement activities to identify, characterize, and address metals emissions. In addition, there are a number of ongoing incentive opportunities for early deployment of cleaner technology, equipment, control equipment, and mobile sources.

[15] OEHHA, Health Effects of Hexavalent Chromium, https://oehha.ca.gov/media/downloads/faqs/hexchromiumairfact111616.pdf

[16] OEHHA, Nickel Reference Exposure Levels, https://oehha.ca.gov/media/downloads/crnr/032312nirelfinal.pdf

[17] Agency for Toxic Substances and Disease Registry, Physiological Effects – Lead Toxicity, https://www.atsdr.cdc.gov/csem/leadtoxicity/physiological_effects.html

Regulatory Authority

State and Federal Actions

Several state and federal rules apply to sources of pollution from metal processing facilities within this community. **Table A5e-3** summarizes state and federal programs to address toxic metal air pollutant emissions.

Table A5e-3: State and Federal Programs to Address Toxic Metal Air Pollutant Emissions

Program	Purpose
CARB's Airborne Toxic Control Measures (ATCM)[18]	• A statewide air emission control program to reduce air emissions from mobile and stationary sources, including measures that address processes that emit metals (e.g., hexavalent chromium[19] and cadmium)

Assembly Bill 2588 (AB 2588) – Air Toxics Hot Spots Program[20]	• A statewide program that addresses air toxics pollution from certain facilities by:
	  ○ Collecting air toxics emissions information
	  ○ Identifying facilities that have local impacts
	  ○ Providing public information about air toxics impacts from facilities
	• Reducing significant air toxics risks from facilities

U.S. EPA Title V[21]	• A federal law that requires major sources of air pollutants, and certain other sources, to:
	  ○ Obtain an operating permit
	  ○ Operate in compliance with the permit
	  ○ Certify at least annually their compliance with permit requirements

[18] CARB, Airborne Toxic Control Measures, https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures
[19] CARB, Chrome Plating ATCM, https://ww2.arb.ca.gov/our-work/programs/chrome-plating-atcm
[20] South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588
[21] South Coast AQMD, Title V, http://www.aqmd.gov/home/permits/title-v

Program	Purpose

U.S. EPA Superfund Program[22]	• A federal program that is responsible for:
	  ○ Environmental cleanups of some of the most contaminated land
	  ○ Responding to environmental emergencies, oil spills, and natural disasters

DTSC Brownfields Program[23]	• DTSC provides regulatory oversight for the evaluation and cleanup of brownfields • Brownfields are properties that are contaminated and are underutilized due to perceived remediation cost and liability concerns

Additionally, several other state and federal agencies are responsible for regulating, monitoring, or ensuring employee safety from exposure to hazards such as toxic metal air pollutants. The United States Department of Labor's Occupational Safety and Health Administration (OSHA) ensures that employees work in a safe and healthful environment by setting and enforcing standards, and by providing training, outreach, education, and assistance.[24] The California Department of Toxic Substances Control (DTSC) protects people and the environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of safer products.[25] Additionally, DTSC's Toxicity Criteria for Human Health Risk Assessment Regulation[26] adopts certain toxicity criteria for all human health risk assessments, screening levels, and remediation goals. OEHHA protects and enhances the health of Californians and the state's environment through scientific evaluations that inform, support, and guide regulatory and other actions.[27] OEHHA reviews and updates chemicals listed on Proposition 65,[28] which requires businesses to provide warnings to consumers about exposures to chemicals that are released into the environment and can cause cancer, birth defects, or other reproductive harm.

[22] U.S. EPA, Superfund, https://www.epa.gov/superfund
[23] DTSC, Brownfields, https://dtsc.ca.gov/brownfields/
[24] OSHA, About OSHA, https://www.osha.gov/aboutosha
[25] DTSC, About DTSC, https://dtsc.ca.gov/who-we-are/
[26] DTSC, Toxicity Criteria for Human Health Risk Assessment Regulation, https://dtsc.ca.gov/regs/toxicity-criteria-for-human-health-risk-assessment/
[27] OEHHA, About, https://oehha.ca.gov/about
[28] OEHHA, Proposition 65, https://oehha.ca.gov/proposition-65

South Coast AQMD

South Coast AQMD has a suite of rules that are designed to reduce metal particulate emissions. Rules 1401[29] and 1401.1[30] address the permit review and reduction of TAC emissions from new or modified pollution sources. Rule 1401 establishes health risk thresholds for new or modified permitted equipment or processes that emit TACs. Compliance with Rule 1401 is assessed during the permit evaluation process. Rule 1401.1 establishes risk requirements for new and relocated facilities near schools. Rule 1402[31] implements various aspects of the AB 2588 and includes public notification and risk reduction requirements for facilities that are above a specified health risk threshold. Additionally, South Coast AQMD has rules that control air pollution from metal processing facilities. Typically, South Coast AQMD requires metal processing facilities to meet point source emissions standards to ensure emissions from the source or process meets specific standards that are health protective, and reduce the likelihood of fugitive metal particulate emissions from becoming airborne.

South Coast AQMD metal processing rules generally use three key control elements to address metal TACs:

1. pollution collection and control devices,
2. housekeeping and/or best management practices, and
3. building enclosures.

Pollution control devices (e.g., baghouses, high efficiency particulate air (HEPA) filters, cyclones, wet scrubbers) are equipment that are designed to reduce or eliminate the release of pollutants into the environment. See **Figure A5e-3** for examples of pollution control devices. A pollution control device's effectiveness is based on its collection efficiency and control efficiency. Collection efficiency is how well the pollution control device collects emissions. Control efficiency is how well the pollution control device reduces emissions. Collection and control efficiencies of a pollution control device can be determined through source testing and periodic monitoring can ensure proper maintenance and operation of pollution control devices. Recent South Coast AQMD metal processing rules have adopted mass emission standards or concentration limits at the outlet or exhaust of the pollution control device. These standards are based on the maximum achievability of a specific technology or a desired control efficiency, and ensure emissions from the source or a process meet a specific standard that is health protective.

[29] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1402/par-1401-ph.pdf

[30] South Coast AQMD, Rule 1401.1 – Requirements for New and Relocated Facilities Near Schools, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401-1.pdf

[31] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf

Figure A5e-3: Examples of Pollution Control Devices

Indoor Baghouse

Outdoor Baghouse

Baghouse with HEPA Filter System

Housekeeping practices and enclosures minimize the accumulation of fugitive metal particulate emissions; these fugitive metal particulate emissions can be tracked out via foot or vehicular traffic and become airborne impacting the surrounding community. Housekeeping practices (e.g., periodic cleaning, storage of dust-forming materials) removes emissions resulting from metal processing operations before they can become fugitive metal particulate emissions. Enclosures (e.g., automatic doors, installation of overlapping plastic strip curtains, vestibules, airlock systems) minimize any cross-drafts that can carry fugitive metal particulate emissions out of the building and ensure cross-drafts are not interfering with the collection efficiency of pollution control devices. See **Figure A5e-4** for examples of housekeeping practices and enclosures. Fugitive metal particulate emissions are often difficult to quantify due to a lack of accepted emission estimation methods.

Figure A5e-4: Examples of Housekeeping Practices and Enclosures

Wet Cleaning Methods (e.g. wet wash, wet mop, damp cloth, low pressure spray)

Dry-Wet Vacuum Sweeper

Cross-Draft Minimization Using Overlapping Strip Curtains

As fugitive metal particulate emissions are difficult to quantify, many South Coast AQMD regulations addressing toxic metal emissions from industrial facilities (e.g., South Coast AQMD Rule 1407.1[32] and Rule 1420.1[33]) include requirements to reduce fugitive metal particulate emissions from these facilities. Best management practices include housekeeping provisions to minimize fugitive metal particulate emissions from becoming airborne, collection efficiency requirements to ensure the pollution control device has the appropriate design and operating parameters to collect emissions, and enclosures to contain fugitive metal particulate emissions. For example, during the rule development process for Rule 1420.1 for lead-acid battery recycling facilities, it was seen that fugitive metal particulate emissions were a contributing factor to ambient lead concentration. Feasibility studies found that emission controls greater than 99 percent reductions would not be expected to further reduce ambient lead concentrations. Thus,

[32] South Coast AQMD, Rule 1407.1 – Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1407-1.pdf

[33] South Coast AQMD, Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1420-1.pdf

Rule 1420.1 contains comprehensive housekeeping and enclosure provisions to address fugitive metal particulate emissions as do the other lead rules, Rule 1420[34] and Rule 1420.2.[35] The non-lead metal melting companion rule, Rule 1407,[36] also focuses on addressing fugitive metal particulate emissions of arsenic, cadmium, and nickel.

Additionally, toxic metal emissions from metal recyclers and metal scrap yards near sensitive receptors were highlighted as concerns by the community. Most metal recyclers and metal scrap yards do not have equipment subject to South Coast AQMD permits but could still be subject to some South Coast AQMD rules such as Rules 403.[37] Rule 403 focuses on controlling particulate emissions from fugitive dust sources through dust control measures. Rule 403 requires that no dust emissions be visible beyond the property line, dust generated from moving vehicles on the site not exceed 20 percent opacity, site-contributed ambient PM10 (particulate matter with a diameter of 10 microns or less) concentrations measured at the fence line of the property not exceed 50 micrograms per cubic meter, and any track-out of dirt or materials not extend beyond 25 feet from the site. These facilities may be the source of public complaints even though they do not have South Coast AQMD permits; when such complaints are received, these locations will be investigated.

Table A5e-4 and **Table A5e-5** summarize South Coast AQMD's rules to address toxic metal air pollutants from metal processing facilities, some of these rules may be applicable to SLA metal processing facilities.[38] Additionally, South Coast AQMD's Rule 402[39] and Rule 403 are general rules that can be applied to metal processing facilities. Rule 402 prohibits the release of air contaminants in quantities that harm public health or causes public endangerment.

[34] South Coast AQMD, Rule 1420 – Emissions Standard for Lead, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1420.pdf

[35] South Coast AQMD, Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/Rule-1420-2rev.pdf

[36] South Coast AQMD, Rule 1407 – Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Chromium Metal Melting Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1407.pdf

[37] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf

[38] All facilities within South Coast AQMD's jurisdiction that have the potential to emit air pollutants through equipment operation or use of regulated products may be subject to a number of South Coast AQMD rules. For more information related to the entire suite of South Coast AQMD rules, please refer to: http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book.

[39] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

Table A5e-4: South Coast AQMD Rules to Address Toxic Metal Air Pollutants

Rule	Source Category	Toxic Metal Air Pollutant	Purpose	Applicability	General Provisions
1401[29]	All new, relocated, and modified sources	TACs as listed by OEHHA	• Specifies limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants	• Applications for new, relocated, and modified permit units	• Denial of permit to construct a new, relocated, or modified permit unit if emissions of any TAC would cause an increase in maximum individual cancer risk and burden, and exceedance of hazard index over a certain level as required in this rule occurs
1402[31]	Existing sources	TACs as listed by OEHHA	• Reduce health risk associated with emissions of TACs from existing sources	• Any facility notified by Executive Officer to prepare an Air Toxics Inventory Report, Health Risk Assessment, or Risk Reduction Plan or is subject to the Hot Spots Act (AB 2588)[20]	• Inventory and emissions reporting • Public notification, if applicable • Risk reduction, if applicable
1407[36]	Non-chromium metal melting	Arsenic, Cadmium, and Nickel	• Reduce arsenic, cadmium, and nickel emissions from non-chromium metal melting operations	• Smelters • Foundries • Die-casters • Coating (galvanizing and tinning) • Misc. processes: dip soldering, brazing, aluminum powder production	• Arsenic, cadmium, and nickel point source emission limits • Emissions source testing • Building enclosure • Housekeeping • Parameter monitoring
1407.1[32]	Chromium alloy melting	Arsenic, Cadmium, Hexavalent Chromium, and Nickel	• Reduce arsenic, cadmium, hexavalent chromium, and nickel emissions from chromium-containing metal melting operations	• Smelters • Foundries • Die-casters • Mills • Misc. processes: casting material removal, metal grinding and cutting, metal finishing	• Hexavalent chromium point source emission limits based on distance to nearest sensitive receptor • Arsenic and cadmium content limits for non-iron metals • Emissions source testing • Building enclosure • Housekeeping • Parameter monitoring
1420[34]	Metal melting or lead processing	Lead	• Reduce lead emissions from non-vehicle sources • Reduce exposure to lead • Continue to meet the National Ambient Air	• Lead smelters • Foundries • Lead-acid battery manufacturers and recyclers • Lead platers	• Lead point source emission limit • Ambient lead concentration limit • Emissions source testing • Building enclosure • Housekeeping

Rule	Source Category	Toxic Metal Air Pollutant	Purpose	Applicability	General Provisions
			Quality Standard for lead	• Metal alloy producers processing lead-containing materials	
1420.2[35]	Metal melting	Lead	• Reduce emissions and ambient air concentrations of lead from metal melting facilities • Reduce exposure to lead • Ensure attainment and maintenance of the National Ambient Air Quality Standard for Lead	• Facilities melting more than 100 tons per year (tpy) of lead	• Lead point source emission limit • Ambient lead concentration limit • Emissions source testing • Building enclosure • Housekeeping
1426[40]	Metal finishing	Cadmium, Hexavalent Chromium, Lead, and Nickel	• Reduce emissions of cadmium, hexavalent chromium, lead, and nickel from metal finishing facilities	• Cadmium, chromium, copper, lead, and nickel electroplating • Chromic acid anodizing	• Building enclosure • Chemical storage conditions • Housekeeping, recordkeeping, and reporting
1430[41]	Metal forging	Cadmium, Hexavalent Chromium, and Nickel	• Reduce air toxic emissions, particulate matter emissions, and odors from metal grinding and metal cutting operations from metal forging facilities	• Metal forging facilities with metal grinding or cutting	• Point source standard • Emissions source testing • Building enclosure • Permanent total enclosure, vented pollution controls for facilities close to sensitive receptors • Housekeeping • Odor contingency measures
1469[42]	Electroplating and anodizing	Hexavalent Chromium	• Reduce hexavalent chromium emissions from chromium electroplating and chromic acid anodizing operations (e.g., chrome plating shops)	• Chromium electroplating and chromic acid anodizing and associated operations	• Hexavalent chromium point source standards • Emissions source testing • Building enclosure • Housekeeping • Best Management Practices

[40] South Coast AQMD, Rule 1426 – Emissions from Metal Finishing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1426.pdf

[41] South Coast AQMD, Rule 1430 – Control of Emissions from Metal Grinding Operations at Metal Forging Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1430.pdf

[42] South Coast AQMD, Rule 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf

Rule	Source Category	Toxic Metal Air Pollutant	Purpose	Applicability	General Provisions
1469.1[43]	Chrome spraying	Hexavalent Chromium	• Reduce hexavalent chromium from spray coating operations	• Spray operations for coatings containing hexavalent chromium	• Hexavalent chromium point source standards • Spray booth conditions • Building enclosure • Housekeeping • Cleaning frequencies
1480[44]	Metal processing	Metal TACs	• Require an owner or operator of a facility that is designated by the Executive Officer as a Metal Toxic Air Contaminant Monitoring Facility to conduct monitoring and sampling (i.e., ambient monitoring)	• Facilities with emissions of metal TACs where investigative monitoring and sampling actions are occurring	• Process to require a facility to conduct monitoring and sampling of metal TACs • Requirements if facility is required to conduct monitoring and sampling • Process for facility to cease monitoring and sampling

*Metal TACs rules at: http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiv

[43] South Coast AQMD, Rule 1469.1 – Spraying Operations Using Coatings Containing Chromium, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469-1.pdf

[44] South Coast AQMD, Rule 1480 – Ambient Monitoring and Sampling of Metal Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1480.pdf

Table A5e-5: Relevant Rules for Toxic Metal Air Pollutants in Development or Amendment Process**

Rule	Source Category	Pollutant(s)	Purpose	Applies To
1420[47]	Metal melting or lead processing	Lead and Arsenic	• To update requirements to address arsenic emissions • Additional amendments may be needed to address storage and handling requirements, and revise closure requirements	• Metal alloy producers processing lead and arsenic-containing materials
1420.2[47]	Metal melting facilities	Lead and Arsenic	• To update requirements to address arsenic emissions • Additional amendments may be needed to address monitoring and post closure requirements	• Facilities melting more than 100 tpy of lead
1426.1[47]	Metal finishing	Hexavalent Chromium	• To reduce hexavalent chromium emissions from heated chromium tanks used at facilities with metal finishing operations that are not subject to Rule 1469[42]	• All metal finishing facilities operating chromium tanks that are not subject to Rule 1469[42]
1435[45]	Metal heat treating	TACs	• To reduce point source and fugitive TACs, including hexavalent chromium, from heat treating process • To include monitoring, reporting, and recordkeeping requirements	• Heat treating facilities
1445[47]	Laser arc cutting	Hexavalent Chromium and other metal TACs	• To reduce hexavalent chromium and other metal TAC particulate emissions from laser arc cutting	• Laser arc cutting facilities
1455[47]	Torch cutting and welding of chromium alloys	Hexavalent Chromium	• To reduce point source and fugitive hexavalent chromium emissions from torch cutting and welding of chromium alloys	• Facilities performing torch cutting and welding of chromium alloys
1460[46]	Metal recycling and shredding	Fugitive Particulate Emissions	• To establish housekeeping and best management practices to minimize fugitive particulate emissions from metal cutting and shredding operations	• Metal recycling and shredding operations
1469[47]	Electroplating and chromic acid anodizing	Hexavalent Chromium	• Amendments may be needed if CARB's Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and Chromic Acid Anodizing Operations is revised	• Chromium electroplating and chromic acid anodizing operational facilities

[45] South Coast AQMD, Rule 1435 – Control of Toxic Emissions from Metal Heat Treating Processes, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1435

[46] South Coast AQMD, Rule 1460 – Control of Particulate Emissions from Metal Recycling and Shredding Operations, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1460

**On the rule and control measure forecast or under the rule development process as of May 2022[47]

Air Monitoring

South Coast AQMD's efforts to address this air quality priority in the SLA community entail conducting initial air monitoring surveys near facilities of concern identified by the CSC in order to characterize any potential emissions. These surveys will use the mobile monitoring approach to measure metal TACs around the metal processing facilities of interest and in surrounding communities.

If potential sources are identified through mobile monitoring, stationary measurements may also be conducted near the identified facilities to better characterize their emissions. For this purpose, ambient levels of particulate metals may be measured using either continuous measurements or collection of 24-hour time-integrated samples for laboratory analysis, or a combination of both. In case these measurements suggest that any of the operations or other sources at the metal-processing facility of concern have the potential to emit hexavalent chromium, fixed-site monitoring of hexavalent chromium will be conducted through the collection of time-integrated samples followed by laboratory analysis.

Findings from these monitoring efforts will provide information to support CERP actions. When appropriate, follow-up compliance and enforcement actions will also be taken by the South Coast AQMD inspectors to mitigate emissions.

Compliance and Enforcement

South Coast AQMD regularly conducts compliance and enforcement activities at metal processing facilities within SLA. These activities fall into two categories:

- Those initiated by South Coast AQMD, such as routine facility inspections or targeted rule inspections.
- Those prompted by outside parties, such as, complaint investigations, facility notifications, and agency referrals.

While there are many reasons to conduct an inspection, air pollution concerns received directly from community members through public complaints are a very important source of information. All complaints received are assigned to an inspector for investigation. The complaint telephone line is handled by a live attendant during business hours (Monday to Friday) or by a standby system during non-business hours. Complainant information is kept confidential, and while anonymous complaints are accepted, providing contact information is crucial for the inspector to be able to gather any relevant information to conduct an effective investigation. **To report complaints, community members can call 1-800-CUT-SMOG (1-800-288-7664) or file an online complaint at https://www.aqmd.gov/home/air-quality/complaints.**

[47] South Coast AQMD includes a Rule and Control Measure Forecast as a standing agenda item at each Governing Board meeting. The May 2022 Rule and Control Measure Forecast is available at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-may6-019.pdf

Inspections are generally unannounced so that the inspector can observe a facility conducting normal operations. Inspections are conducted to evaluate the overall compliance status of the facility or to focus on specific aspects of an operation to ensure the facility is following a specific rule or regulation. Different types of metal processing facilities may be required to abide by specific applicable rules; therefore, inspectors will verify compliance with all rules, regulations, and permit conditions that are relevant to a facility.

If a facility is determined to be out of compliance with air pollution rules or regulations or permit conditions, inspectors will take necessary enforcement action to address the non-compliant activity. There are two types of enforcement actions:

1. A Notice to Comply (NC) may be issued for minor violations found during an inspection or to request additional information.
2. A Notice of Violation (NOV) may be issued for violations of rules or permit conditions. NOVs usually result in a penalty.

If a facility cannot immediately comply with air pollution laws, it may seek a variance from a rule requirement or permit condition by filing a petition and appearing before the South Coast AQMD Hearing Board.[48] In cases of ongoing noncompliance, a petition for an Order for Abatement may be brought against the facility, which will seek to require the company to take specific actions or cease operating in violation of South Coast AQMD rules or regulations. These processes serve to ensure that a facility returns to compliance expeditiously while minimizing air quality impacts.

Since metal processing facilities have been identified as a community priority, Assembly Bill 617 CERP actions include enhanced enforcement efforts intended to address SLA community concerns directly, taking community input into account where appropriate.

Incentives

For information related to incentives, please refer to Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

[48] Please see Appendix 4 for more information regarding the South Coast AQMD Hearing Board.

Appendix 5f

Oil and Gas Industry

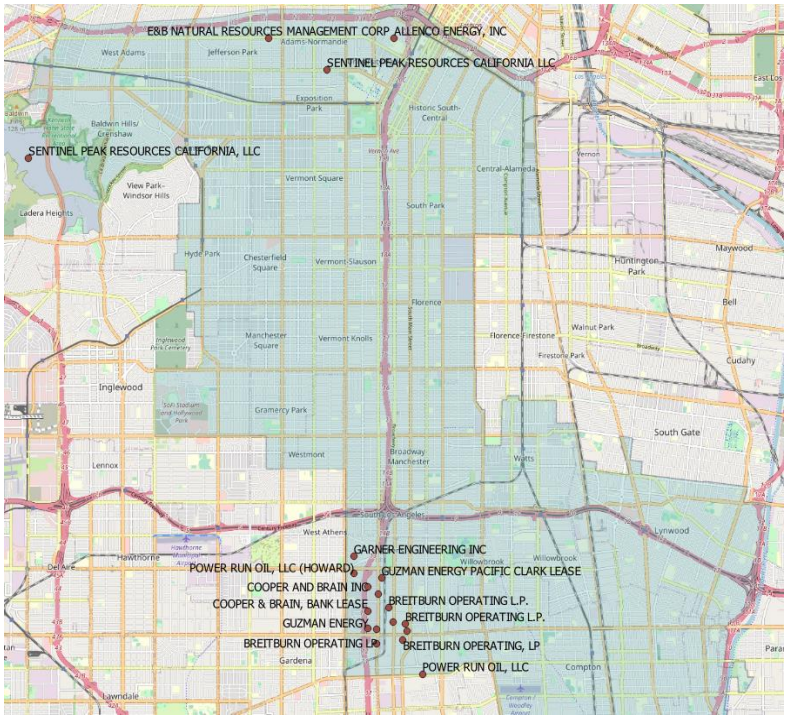
Introduction

During the Community Steering Committee (CSC) meetings, the community co-leads helped lead discussions to identify air quality concerns and actions for this Community Emissions Reduction Plan (CERP). One of the concerns raised by the South Los Angeles (SLA) CSC is emissions resulting from oil and gas operations conducted at drill sites and oil wells. The CSC identified four oil and gas facilities (i.e., Jefferson, Murphy, AllenCo Energy Inc., and the Inglewood Oil Fields) as locations of concern due to the proximity of these facilities to nearby residences. The SLA CSC expressed concern that there is limited transparency of monitoring data and enforcement activity findings, such as Notices of Violations (NOVs). This appendix provides additional supporting information for Chapter 5f: Oil and Gas Industry, including an overview of applicable facilities, emissions, and regulatory efforts. The overview of regulatory efforts includes a summary of regulatory authority, air monitoring, enforcement, and incentive efforts to address emissions from and exposure to oil and gas operations.

Community Impacts from Oil and Gas Facilities

There are 19 oil and gas facilities with active South Coast Air Quality Management District (South Coast AQMD) permits,[1] as shown in **Figure A5f-1**. During CERP development, this category of facilities was referred to as "Mineral Processes." These facilities have a classification within the North American Industry Classification System (NAICS)[2] as code 211120: Crude Petroleum Extraction and 211130: Natural Gas Extraction.[3]

Figure A5f-1: Map of Oil and Gas Facilities with Active South Coast AQMD Permits in SLA

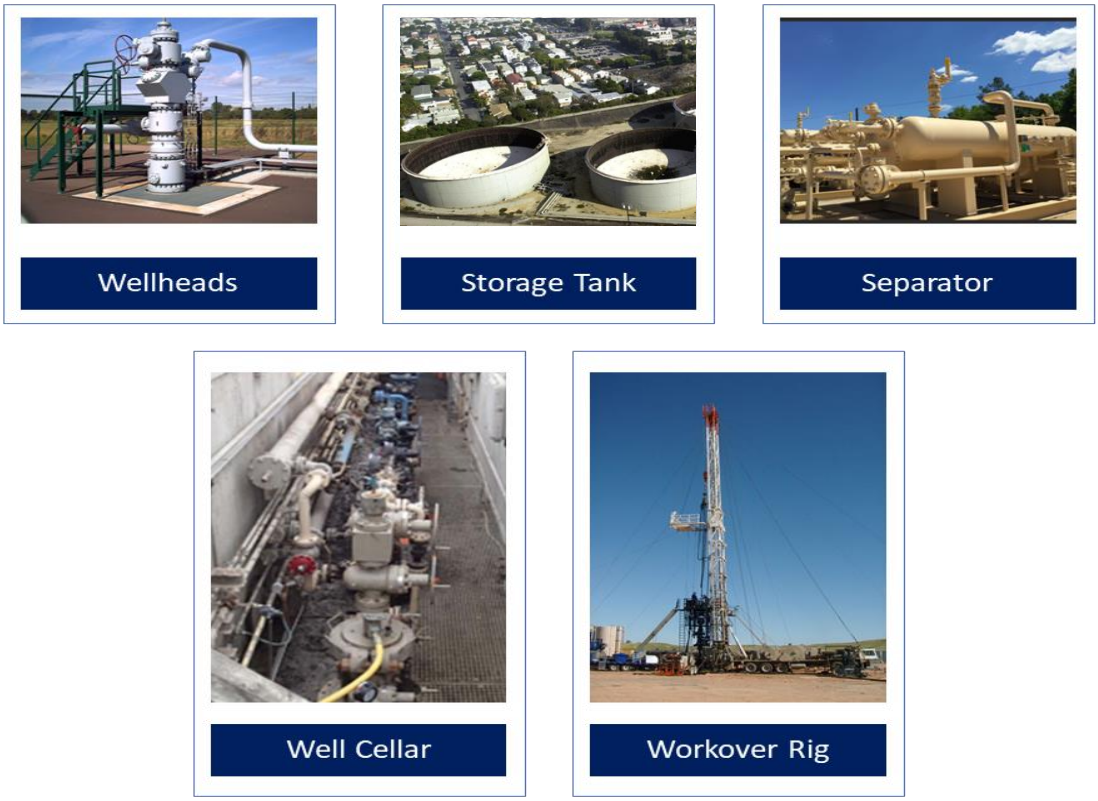


[1] The total number of facilities applicable to this air quality priority was arrived at using multiple sources, such as permit type, technical specialty (TS) number, and NAICS codes. TS refers to the internal code South Coast AQMD

Emissions from Oil and Gas Industry

Emissions information for SLA oil and gas facilities is available in Chapter 2d: Emissions and Source Attribution Analysis and Appendix 2d: Source Attribution. Oil and gas production, well maintenance, and stimulation activities may release emissions such as volatile organic compounds (VOCs), some of which are toxic air contaminants (TACS), nitrogen oxides (NOx), methane, diesel particulate matter (DPM), fugitive dust, and carbon monoxide (CO). **Figure A5f-2** provides examples of oil and gas emission sources.

Figure A5f-2: Examples of Oil and Gas Emission Sources



VOCs are chemicals containing carbon that readily evaporate. In the absence of appropriate control measures, these compounds will ultimately end up in the atmosphere. Subsequent chemical reactions of VOCs in the atmosphere can form surface level ozone pollution and particulate matter. Ozone is formed by the reaction of VOCs with NOx in the presence of sunlight. Oil is composed primarily of hydrocarbons (VOCs) with five or more carbon atoms with an

inspectors use to determine the appropriate inspection team. Please refer to Appendix 4: Enforcement Overview and History for more information on South Coast AQMD inspection teams.

[2] United States Census Bureau, North American Industry Classification System, https://www.census.gov/naics/

[3] The NAICS designation is not provided by South Coast AQMD. Rather, the NAICS designation is provided by the owner or operator within the permit application submitted to South Coast AQMD for any applicable equipment.

average composition of alkanes (30 percent), cycloalkanes (50 percent), aromatics (15 percent), and other (5 percent).

Some hydrocarbon components classified as VOC emissions are TACs including benzene, toluene, ethylbenzene, and xylene. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory and other health problems.[4] Benzene, for example, is a hydrocarbon component of VOC emissions that is known to be a human carcinogen.[5] Based on emissions from 2019,[6] over three percent of all VOC emissions in SLA are from the major source categories of Fuel Combustion and Petroleum Production and Marketing (**Table A5f-1).**

NOx is a family of gases that are highly reactive with other pollutants to form both ground-level ozone and fine particulate matter (PM2.5). The chemical reactions that form ozone are highly complex and depend not only on NOx and VOC levels, but also on the ratio of VOC to NOx concentrations. Ground-level ozone can harm the respiratory system.

The focus of the Assembly Bill 617 (AB 617) program is to reduce TACs and criteria air pollutants, but other pollutants, such as greenhouse gases like methane, also have the potential to impact the community. Methane is the primary component of natural gas and is present during crude oil extraction. Methane is a precursor gas to tropospheric ozone and has a high global warming potential.[7] Methane can be emitted during the production, processing, storage, and transportation of crude oil and gas.

[4] U.S. EPA, Health and Environmental Effects of Hazardous Air Pollutants, https://www.epa.gov/haps/health-and-environmental-effects-hazardous-air-pollutants

[5] South Coast AQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf

[6] Source attribution information may be found in Appendix 2d.

[7] U.S. EPA, Understanding Global Warming Potentials, https://www.epa.gov/ghgemissions/understanding-global-warming-potentials

Table A5f-1: Emissions from Oil and Gas Industry Sources in SLA in 2019[6]

Emission Source	VOC (tpy)*	NOx (tpy)*	CO (tpy)*	Benzene (tpy)*
Fuel Combustion				
Oil and Gas Production (combustion)	0.64	3.32	7.41	0.02
Petroleum Refining (combustion)	0.0	0.0	0.0	0.0
Petroleum Production and Marketing				
Oil and Gas Production	46	0.06	0.32	0.49
Petroleum Refining	1.2	0.0	0.0	0.0
Petroleum Marketing	150	0.0	0.0	0.75
Other (Petroleum Production and Marketing)	0.0	0.0	0.0	0
Total Oil and Gas Categories	197	3.4	7.7	1.3
All Other Stationary and Area Sources	3,092	687	1,748	8.6
All Mobile Sources	2,169	2,649	23,450	57
Total	5,458	3,339	25,206	67

*Emissions were calculated and presented in tons per day for criteria air pollutants and pounds per day for TACs in Chapter 2d and Appendix 2d.

Regulatory Efforts

Regulatory Authority

Air quality regulations to reduce air pollution from the oil and gas industry are set forth by city agencies, local air districts (e.g., South Coast AQMD), and state agencies (e.g., CARB, California Geologic Energy Management Division (CalGEM)[8]). Local land-use agencies can establish long-term goals, ordinances, and policies for land use that can also have an impact on local air pollution (e.g., Los Angeles County Draft Oil Well Ordinance[9]).

[8] The California Geologic Energy Management Division (CalGEM) was previously known as previously known as the Division of Oil, Gas, and Geothermal Resources (DOGGR).

[9] Los Angeles County Department of Regional Planning, Draft Title 22 Oil Well Ordinance, https://planning.lacounty.gov/assets/upl/data/2020-04-13-draft_oil_well_ordinance.pdf

State Actions

Several state rules apply to sources of pollution from oil and gas facilities within this community (**Table A5f-2**).

Table A5f-2: State Programs to Address Oil and Gas Facilities

Program	Purpose
CARB Oil and Gas Regulation[10]	• A statewide regulation to establish greenhouse gas emission standards for crude oil and natural gas facilities
CalGEM Public Health Rule[11]	• If enacted in its current draft form, the proposed rule would require a 3,200-foot setback zone in the construction of new oil wells from sensitive receptors, such as residences, education resources, and health care facilities
CalGEM Idle Well Program[12]	• A statewide regulation that requires testing and management for idle well designation, repair, or permanent sealing and closing to protect public safety and the environment from the potential threats posed by idle wells

Assembly Bill 2588 (AB 2588) – Air Toxics Hot Spots Program†[,13]	• A statewide program that addresses TACs pollution from certain facilities by:
	  ○ Collecting TACs emissions information
	  ○ Identifying facilities that have local impacts
	  ○ Providing public information about TACs impacts from facilities
	• Reducing significant TACs risks from facilities

†Applies to facilities that have estimated annual emissions of four or more tons of either sulfur oxides (SOx), VOCs, NOx, specific organics (SPOG), or particulate matter (PM), or emissions of 100 tons per year or more of carbon monoxide (CO).

[10] CARB, Subarticle 13: Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities, https://ww2.arb.ca.gov/sites/default/files/2020-03/2017%20Final%20Reg%20Orders%20GHG%20Emission%20Standards.pdf

[11] CalGEM, Public Health Rulemaking, https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx

[12] CalGEM, Idle Well Program, https://www.conservation.ca.gov/calgem/idle_well

[13] South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588

California Air Resources Board

CARB has authority over greenhouse gas emission standards for stationary sources, such as crude oil and natural gas facilities. Through CARB's Oil and Gas Regulation,[10] owners or operators of oil and natural gas facilities are required to conduct quarterly leak detection and repair (LDAR) surveys by monitoring components and repairing detected leaks within a specified time frame. CARB has authority to inspect oil and gas facilities to verify compliance with the Oil and Gas Regulation, in addition to any of their other regulations that may be applicable to equipment found on site (e.g., off-road equipment, PERP equipment). South Coast AQMD has authority to implement and enforce the Oil and Gas Regulation through a memorandum of agreement that gives local air districts delegated authority to enforce CARB rules.[14]

California Geologic Energy Management Division

CalGEM is a state agency that regulates oil and gas facilities, requires owners and operators to report the status of their wells, and has the authority to inspect oil and gas facilities. The data is available through a database of active, idle, and abandoned wells throughout the state of California.[15] Based on records from CalGEM's database (updated in 2015), there are approximately 6,100 oil, gas, and geothermal wells that are active or idle in the Los Angeles, Riverside, San Bernardino, and Orange County regions. CalGEM's program includes idle, abandoned, geothermal and water injection wells, which are not registered by South Coast AQMD. Active oil wells are limited to wells that actively withdraw oil. Idle wells are those that have not been used for two years or more and have not yet been sealed and closed (abandoned).

Local Governments

Local governments have the flexibility to address air quality issues, such as those resulting from the oil and gas industry, through ordinances and land use. Land use refers to how certain areas of land are classified for development and use. Land-use data is often used for city or county planning, such as the placement of housing developments and transportation hubs. Cities, counties, and unincorporated areas regulate oil and gas operations in varying degrees through their land-use and zoning authorities to aid in protecting and minimizing their negative impacts on public health, safety, and the environment. For example, the Los Angeles County Department of Regional Planning released a draft Oil Well Ordinance in April 2020 to update permit requirements and development and operating standards for existing and new oil wells and accessory facilities in unincorporated Los Angeles County.[16] South Coast AQMD makes referrals to land-use agencies, public works departments, and other responsible agencies regarding enforcement of city or county ordinances related to oil and gas industry practices.

[14] CARB, Memorandum of Agreement between the California Air Resources Board and the South Coast Air Quality Management District Regarding Implementation and Enforcement of Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities, https://ww2.arb.ca.gov/sites/default/files/2020-03/South%20Coast%20MOA.pdf

[15] CalGem, Well Finder, https://www.conservation.ca.gov/calgem/Pages/Wellfinder.aspx

[16] Los Angeles County Department of Regional Planning, Oil Well Ordinance, https://planning.lacounty.gov/oilwell

Cities often carry out health risk assessments to determine health effects of industries and report on findings with suggestions on possible ways to improve conditions. One example can be found in a City of Los Angeles July 29, 2019 report[17] which suggested that one way to improve health oversight is "[Los Angeles] County could deputize the LAFD with health officer authority for oversight and inspections of oil and gas facilities within the City. The action would be proactive for future incidents […and] would allow for our local emergency services agency, LAFD, to have more oversight and authority in the event an emergency related to oil and gas operations."

South Coast AQMD

The CSC has expressed concerns relating to particular oil and gas facilities, their proximity to residences, and odors and fugitive emissions from these types of facilities. Due to the geography of the region, this equipment and point sources of emissions in the oil and gas industry are often located in urban areas, and sometimes located within close proximity to residential and other sensitive receptors, as is the case in several areas within SLA. South Coast AQMD is given broad authority to regulate air pollution from "all sources, other than emissions from motor vehicles."[18] The term "air pollutant" includes odors.[19] Therefore, South Coast AQMD may regulate to control air pollution, including odors, from oil and gas wells. Rule 1148[20] establishes VOC[21] emission limits for steam drive wells. Steam drive wells combine oil production and steam injection wells to extract oil. In some cases, these operations are connected to a vapor control system. Both uncontrolled and controlled steam drive wells are limited to 4.5 pounds per day of reactive organic gases (ROG)[22] emissions. Rule 1148.1[23] establishes VOC and toxic emission limits from wellheads, well cellars, and handling equipment. The regulation includes a requirement that facilities submit an Odor Mitigation Plan if an odor nuisance occurs on two or more days, or if there are three confirmed odor events within a six-month period. Rule 1148.2[24] establishes informational requirements for oil and gas wells. Rule 1148.2 requires notification when conducting well drilling, well completion, or well reworks. Operators must notify South Coast AQMD at least 48 hours prior to the start of drilling. Chemical ingredients used in drilling are also required to be reported. In addition to the Rule 1148 series, applicable South Coast AQMD rules or the oil and gas industry include, but are not limited to, Rule 463,[25] Rule 1118.1,[26] Rule 1173,[27] and Rule 1176.[28]

Figure A5f-3, Table A5f-3, and **Table A5f-4** provide an overview of South Coast AQMD rules that may be applicable to oil and gas facilities.

[17] City of Los Angeles Clerk, Council File No 17-0447, Feasibility of Amending Current City Land Use Codes in Connection With Health Impacts at Oil and Gas Wells and Drill Sites, https://clkrep.lacity.org/onlinedocs/2017/17-0447_rpt_BPW_07-29-2019.pdf

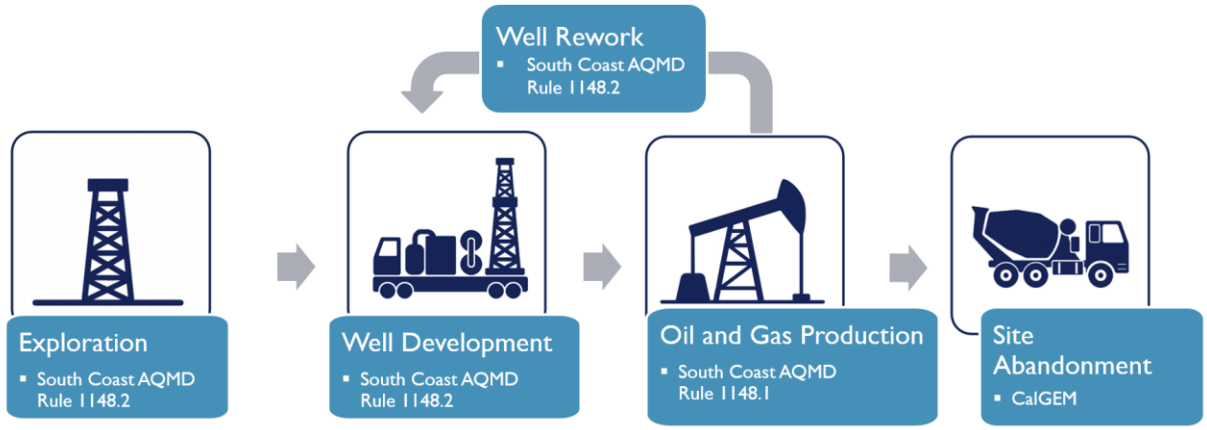
[18] California Health and Safety Code, Section 40000

[19] California Health and Safety Code, Section 39013

[20] South Coast AQMD, Rule 1148 – Thermally Enhanced Oil Recovery Wells, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148.pdf

Additionally, South Coast AQMD's Rule 402[29] and Rule 203[30] are general rules that can be applied to the oil and gas industry. Rule 402 prohibits the release of air contaminants in such quantities that causes nuisance to a considerable number of persons or to the public.

Figure A5f-3: Overview of Oil and Gas Well Regulations



[21] South Coast AQMD Rule 102 – Definition of Terms, defines VOCs as "any volatile compound of carbon, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and exempt compounds." http://www.aqmd.gov/docs/default-source/rule-book/reg-i/rule-102-definition-of-terms.pdf

[22] South Coast AQMD Rule 1148 defines ROGs as "any gaseous chemical compound which contains the element carbon; excluding carbon monoxide, carbon dioxide, carbonic acid, carbonates and metallic carbides; and excluding methane, 1,1,1-trichloroethane, methylene chloride, trifluoromethane and chlorinated-fluorinated hydrocarbons."

[23] South Coast AQMD, Rule 1148.1 – Oil and Gas Production Wells, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-1.pdf

[24] South Coast AQMD, Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf

[25] South Coast AQMD, Rule 463 – Organic Liquid Storage, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-463.pdf

[26] South Coast AQMD, Rule 1118.1 – Control of Emissions from Non-Refinery Flares, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/R1118-1.pdf

[27] South Coast AQMD, Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1173.pdf

[28] South Coast AQMD, Rule 1176 – VOC Emissions from Wastewater Systems, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1176.pdf

[29] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

[30] South Coast AQMD, Rule 203 – Permit to Operate, http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf

Table A5f-3: South Coast AQMD Rules to Address the Oil and Gas Industry

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
463[25]	Stationary above-ground tanks	VOCs	• Reduce emissions of VOC from the storage of organic liquids in stationary above-ground tanks	• Above-ground stationary tanks with capacity of 19,815 gallons or greater used for storage of organic liquids • Above-ground tank with a capacity between 251 gallons and 19,815 gallons used for storage of gasoline	• Tank roof requirements • Performance requirements • Inspection requirements • Maintenance requirements • Reporting and recordkeeping requirements
1118.1[26]	Non-refinery flares	NOx, VOCs	• Reduce NOx and VOC emissions from flaring produced gas, digester gas, landfill gas, and other combustible gases or vapors • Encourage alternatives to flaring	• Owners and operators of facilities that require a South Coast AQMD permit at non-refinery facilities which conduct flaring, such as oil and gas production facilities, wastewater treatment facilities, landfill, and organic liquid handling facilities	• NOx, VOC, and CO emissions limits • Flare throughput reduction or flare or flare station replacement or modification • Source testing • Annual capacity threshold compliance • Monitoring, recordkeeping, and reporting
1148[20]	Thermally enhanced oil recovery wells	ROGs	• Establish ROG limits for the operation of steam drive wells	• Operators of any new steam drive well, non-steam drive wells converted to steam drive wells • Existing oil production wells operated as a steam drive well	• ROG emission limits for wells with and without vapor control systems • Annual compliance testing of vapor control systems
1148.1[23]	Oil and gas production wells	VOCs, TACs, Total Organic Compounds (TOCs)	• Reduce VOC emissions from the operation and maintenance of wellheads, well cellars, and the handling of produced gas at oil and gas production facilities • Assist in reducing regional ozone levels and to prevent public nuisance and possible detriment to public health caused by	• Onshore oil producing wells, well cellars, and produced gas handling operation and maintenance activities at onshore facilities where petroleum and processed gas are produced, gathered, separated, processed, and stored	• TOC concentration limits • Operational and maintenance standards (e.g., preventative measures regarding spilling organic liquid) • Odor mitigation plan • Operator inspection • Specific cause analyses required for confirmed odor or oil deposition events at facilities within 1,500 feet of a sensitive receptor • Implementation of an approved Odor Mitigation Plan for facilities with continuing odor issues

Rule	Source Category	Air Pollutant	Purpose	Applicability	General Provisions
			exposure to such emissions		
1148.2[24]	Oil and gas wells and chemical suppliers		• Gather air quality-related information on oil and gas well drilling, well completion, and well reworks	• Any operator of an onshore oil or gas well that is conducting oil or gas well drilling, well completion, or well reworks	• Notification requirements • Reporting requirements
1173[27]	Atmospheric process pressure relief devices (PRDs)	VOCs	• Control VOC leaks from components and releases from PRDs	• Components at refineries, chemical plants, lubricating oil and grease re-refiners, marine terminals, oil and gas production fields, natural gas processing plants and pipeline transfer stations	• Operator identification, inspection, and maintenance requirements • Leak standards • Recordkeeping and reporting requirements • Atmospheric process PRD requirements • Test methods
1176[28]	Wastewater systems	VOCs	• Limit VOC emissions from wastewater systems	• Wastewater systems and associated control equipment located at petroleum refineries, on-shore oil production fields, off-shore oil production platforms, chemical plants, and industrial facilities	• Identification requirements for petroleum refineries and facilities other than petroleum refineries • Operation and control requirements • Inspection, monitoring, and maintenance requirements • Recordkeeping, reporting, and verification of records requirements • Test methods

Table A5f-4: Relevant Rules for Oil and Gas Facilities in Development or Amendment Process*

Rule	Source Category	Air Pollutant	Purpose
463[33]	Stationary above-ground tanks	VOCs	• To address the current test method and improve the effectiveness, enforceability, and clarity of the rule • To ensure consistency with Rule 1178[31]
1148.1[33]	Oil and gas production wells	VOCs, TACs, TOCs	• To further reduce emissions from operations, implement early leak detection, odor minimization plans, and enhanced emissions and chemical reporting from oil and drilling sites
1148.2[33]	Oil and gas wells and chemical suppliers		• To evaluate the applicability of well activities, improve notifications of well working activities, and address other issues
1180.1[33]	Non-petroleum refineries and facilities	Criteria air pollutants, VOCs, metals, and other compounds	• To establish fence line and community monitoring requirements for non-petroleum refineries and facilities that are not currently included in Rule 1180[32]

*On the rule and control measure forecast or under the rule development process as of May 2022[33]

Of the 19 oil and gas facilities identified above, there are 16 facilities with multiple wells on site that are inspected annually under South Coast AQMD's existing regulatory programs. There may be additional oil and gas facilities within the SLA community boundary that are applicable to this air quality priority but may not require South Coast AQMD permits. Such facilities include abandoned wells and sites with small, miscellaneous equipment. These facilities may be subject to other governmental agency ordinances or laws, such as the City of Los Angeles or the County of Los Angeles.

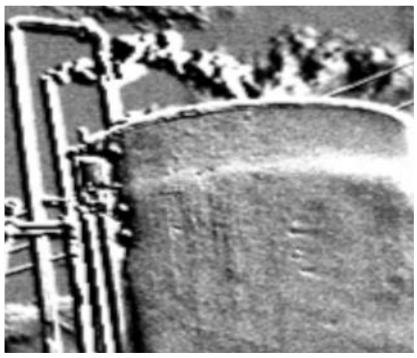
Fugitive emissions may result when leaks occur at equipment components such as valves, flanges, and pump seals. Therefore, South Coast AQMD regulations include requirements to minimize fugitive emissions from oil and gas facilities. Some rules, such as Rule 1148.1, will undergo review to determine if additional opportunities are available to update Best Available Control Technology and Best Available Retrofit Control Technology (BACT and BARCT, respectively) for control of emissions from oil and gas production equipment. As preventive measures to reduce fugitive emissions, applicable oil and gas rules may also include requirements for leak detection and repair (LDAR). Based on data from ambient monitors, leaks may be identified more quickly minimizing fugitive emissions and reducing the potential impacts to the surrounding areas.

[31] South Coast AQMD, Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1178.pdf

[32] South Coast AQMD, Rule 1180 – Refinery Fenceline and Community Air Monitoring, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1180.pdf

[33] South Coast AQMD includes a Rule and Control Measure Forecast as a standing agenda item at each Governing Board meeting. The May 2022 Rule and Control Measure Forecast is available at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-may6-019.pdf

Figure A5f-4: Petroleum Storage Tank Leak Visualized by FLIR Camera



Air Monitoring

South Coast AQMD

Oil and gas operations are associated with emissions of VOCs, including BTEX (benzene, toluene, ethylbenzene, xylenes), particulate matter, NOx, and other pollutants, which have the potential to impact nearby communities. The monitoring strategy to study and characterize emissions related to this air quality priority consists of measurements using a mobile platform capable of monitoring a number of different gases commonly emitted by oil and gas operations, including BTEX, total alkanes, and methane. Initial mobile measurement surveys will be conducted near the drilling sites within the community and in areas of concern identified by the CSC as potentially impacted by oil and gas operations. Measurements made during these surveys will be used both to characterize air pollutants concentrations in these areas and to identify any localized enhancements that could be indicative of leaks. These surveys are frequently conducted in coordination with South Coast AQMD inspectors, who use Forward Looking InfraRed (FLIR) cameras (**Figure A5f-4**) and Toxic Vapor Analyzers (TVAs) to confirm and determine the location of leaks. Findings from these surveys will also be used to determine if additional measurements are needed. In addition to initial mobile measurement surveys, South Coast AQMD will also work with the CSC and collaborate with other agencies to determine whether air monitoring should be conducted under certain conditions or during certain well activities. South Coast AQMD will also work with the CSC to identify ways to support citizen scientists engaged in air monitoring in their communities. This effort will include a pilot study working with community members to use a handheld VOC monitor to make measurements near oil and gas sites at times when increased activity, odors, or other concerns are noted.

California Air Resources Board

CARB is implementing the Study of Neighborhood Air near Petroleum Sources (SNAPS) program to better understand potential impacts of criteria pollutants and TACs in neighborhoods near oil and gas activities. The program includes limited-term (one-year), intensive air quality measurements with a particular focus on oil production facilities.[34] CARB selected Baldwin Hills and communities surrounding the Inglewood Oil Field for monitoring under the SNAPS program. Mobile monitoring will complement stationary air quality monitoring at this site. The SNAPS program had a delayed deployment at this location due to the pandemic, but CARB plans to begin air monitoring near the Inglewood Oil Field in early 2022.

[34] CARB, Study of Neighborhood Air near Petroleum Sources (SNAPS), https://ww2.arb.ca.gov/our-work/programs/study-neighborhood-air-near-petroleum-sources

Compliance and Enforcement

Enforcement information for SLA oil and gas facilities is available in Chapter 4: Enforcement Overview and History and Appendix 4: Enforcement Overview and History.

South Coast AQMD inspectors regularly conduct enforcement activities at oil and gas facilities within SLA. These activities fall into two categories:

- Those initiated by South Coast AQMD, such as routine facility inspections or targeted rule inspections.
- Those prompted by outside parties, such as, complaint investigations, facility notifications, and agency referrals.

While there are many reasons to conduct an inspection, air pollution concerns received directly from community members through public complaints are a very important source of information. All complaints received are assigned to an inspector for investigation. The complaint telephone line is handled by a live attendant during business hours (Monday – Friday) or by a standby system during non-business hours. Complainant information is kept confidential, and while anonymous complaints are accepted, providing contact information is crucial for the inspector to be able to gather any relevant information to conduct an effective investigation. **To report complaints, community members can call 1-800-CUT-SMOG (1-800-288-7664) or file an online complaint at https://www.aqmd.gov/home/air-quality/complaints.**

Inspections are generally unannounced so that the inspector can observe a facility conducting normal operations. Inspections are conducted to evaluate the overall compliance status of the facility or to focus on specific aspects of an operation or specific rule or regulation.

If a facility is determined to be out of compliance with air pollution rules or regulations or permit conditions, inspectors will take necessary enforcement action to address the non-compliant activity. There are two types of enforcement actions:

1. A Notice to Comply (NC) may be issued for minor violations found during an inspection or to request additional information.
2. A Notice of Violation (NOV) may be issued for violations of rules or permit conditions. NOVs usually result in a penalty.

If a facility cannot immediately comply with air pollution laws, it may seek a variance from a rule requirement or permit condition by filing a petition and appearing before the South Coast AQMD Hearing Board.[35] In cases of ongoing noncompliance, a petition for an Order for Abatement may be brought against the facility, which will seek to require the company to take specific actions or cease operating in violation of South Coast AQMD rules or regulations. These processes serve to ensure that a facility returns to compliance expeditiously while minimizing air quality impacts.

[35] Please refer to Appendix 4 for more information regarding the South Coast AQMD Hearing Board.

Since oil and gas facilities have been identified as a community priority, AB 617 CERP actions include enhanced enforcement efforts intended to address SLA community concerns directly, taking community input into account where appropriate. Enhanced enforcement efforts include the actions identified in Chapter 5f: Oil and Gas Industry.

Incentives

For information related to incentives, please refer to Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

Appendix 7

California Environmental Quality Act (CEQA) Analysis

Introduction

The California Environmental Quality Act (CEQA) is a state law that requires agencies to consider the environmental impacts of a proposed project. CEQA describes and imposes specific legal requirements that agencies must follow when evaluating and making decisions about whether a proposed project will cause a significant environmental impact. This appendix contains South Coast Air Quality Management District (South Coast AQMD) staff's analysis of the applicability of CEQA to this project – the Community Emissions Reduction Plan (CERP) for South Los Angeles (SLA). The analysis contains some terms from the language contained in the law and use of that language is part of the process of how South Coast AQMD demonstrates compliance with CEQA. As explained in more detail later in this discussion, South Coast AQMD staff has reviewed all aspects of the SLA CERP and identified several types of CEQA exemptions. As such, South Coast AQMD staff has prepared a Notice of Exemption.

If the South Coast AQMD Governing Board agrees with the analysis and determines that the SLA is exempt from CEQA, and adopts the SLA CERP, a Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties, and with the State Clearinghouse of the Governor's Office of Planning and Research.

Analysis

Pursuant to CEQA, the South Coast AQMD, as lead agency, has reviewed the proposed project pursuant to:

1. CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and
2. CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA.

Because implementing the various components of the proposed project would either not cause any physical changes (e.g., community outreach about South Coast AQMD rules, programs, and tools), or the physical changes that may occur as a result would only require minimal construction activities and cause negligible physical impacts (e.g., installing "No Idling" signs or air filtration systems), it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. Further, the proposed project is also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, because the overall purpose of the proposed project is to benefit the environment and health of residents of the SLA community and all of the action items within the SLA CERP support this goal.

The SLA CERP contains the following action items, which are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262 – Feasibility and Planning Studies, and CEQA

Guidelines Section 15306 – Information Collection, because these action items involve feasibility and planning studies which require information to be collected and examined to ascertain whether further follow-up actions are needed without prescribing or committing to any future action.

- Work with local school districts and the CSC to develop a prioritization list of schools that may benefit from installation of air filtration systems in order to reduce exposure to air pollution, especially mobile source emissions;
- Explore opportunities for incentive funds for cleaner mobile source technologies within the SLA community;
- Identify and prioritize auto body shops of concern, and conduct initial air measurement surveys near facilities of concern;
- Explore opportunities for incentives for low-VOC paints and coatings, and water-based cleaners used at auto body shops within the SLA community;
- Initiate rule development process to amend South Coast AQMD Rules 1151 and 1171 to consider including the United States Environmental Protection Agency best management practices as requirements for auto body shops;
- Prioritize general industrial facilities of concern, identify applicable rules, provide three years of compliance history of facilities of concern, summarize air pollution emission data from the facilities and from areas monitored near the facilities, and identify potential emission reduction measures, if appropriate;
- Conduct initial air measurement surveys near general industrial facilities and metal processing facilities of concern to identify and characterize any potential emissions;
- Initiate rule development process to amend South Coast AQMD Rule 1102 to consider establishing a new emission standard reflecting zero-emission technologies for new dry cleaning systems and identify incentive opportunities to transition to community-identified alternatives for dry cleaning technologies (e.g., South Coast AQMD Rule 1102);
- Identify and prioritize metal processing facilities of concern, identify applicable rules, provide three years of compliance history of facilities of concern, summarize air pollution emission data from the facilities and from areas monitored near the facilities, and identify potential emission reduction measures, if appropriate;
- Conduct an assessment to identify the South Coast AQMD metal processing rules which regulate metal toxic air contaminants but lack best management practices and initiate rule development process to amend these rules to incorporate provisions for best management practices;
- Initiate rule development process for South Coast AQMD Proposed Rule 1460 to address housekeeping and best management practices at metal recycling plants to reduce fugitive emissions;
- Prioritize oil and gas industry locations for siting air monitoring equipment, conduct air measurements surveys around oil drilling sites to characterize potential emissions, collaborate with appropriate agencies and CSC to determine if additional air monitoring

is needed during specific well activities or under certain conditions, and identify opportunities for other agencies to provide information regarding their authority, existing and proposed rules, and/or projects and programs, involving the oil and gas industry;

- Initiate rule development process to amend South Coast AQMD Rule 1148 Series to explore limiting or eliminating odorants and chemicals used onsite and to consider including notification and other requirements pertaining to injection wells, active acid work, operation of workover rigs, use of odorants and chemicals onsite, improvement of leak detection and repair, modifications to any previous notifications, and lower-emission or zero-emission equipment for on-site operations;
- Explore incentive opportunities to support implementation of best management practices and/or installation of emission reduction technologies at oil and gas facilities; and
- Identify opportunities to support community scientists to conduct community air monitoring and implement a community air monitoring plan (CAMP) via stationary and mobile monitoring supplemented by air quality sensors.

If the outcome of the information collection activities and feasibility studies identifies the need to adopt a new rule or modify specific requirements in an existing rule, a separate rule development process and CEQA review may be necessary and the regulated community, stakeholders, interested parties, and the public will be invited to participate. Any South Coast AQMD rule development initiated as a result of the SLA CERP will undergo its own CEQA analysis that will be conducted by the South Coast AQMD in its role as lead agency.

The following action items within the SLA CERP are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301 – Existing Facilities, because they involve minor physical modifications to existing structures or buildings:

- Install “No Idling” signs in CSC-identified locations;
- Install fixed or stationary monitors in response to initial air measurement surveys resulting in a recommendation to conduct fixed monitoring; and
- Work with local school districts and the CSC to develop a prioritization list of schools that may benefit from installation of air filtration systems in order to reduce exposure to exposure to air pollution, especially mobile source emissions.

The SLA CERP also contains the following action items which are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15309 – Inspections, and CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies, because inspections are required to be conducted to check for performance or compliance, and the outcome of these inspections may involve follow-up enforcement activities:

- Conduct inspection sweeps of trucks, buses, auto body shops, and construction sites at locations of concern identified by the CSC, warehouses, dry cleaners, metal processing facilities, and oil and gas facilities;
- Provide periodic summaries of findings from inspection and enforcement activities (i.e., whether odors or emissions were confirmed and verified with complainants during inspections, and whether any enforcement actions were required and taken); and
- Collaborate with and make referrals to other appropriate agencies (e.g., Bureau of Automotive Repair, California Occupational Safety and Health Administration, California Certified Unified Program Agencies, California Department of Toxic Substances Control) when inspections conducted by South Coast AQMD personnel identify potential compliance issues which are not within South Coast AQMD's jurisdiction.

Finally, for the action items identified as categorically exempt, there is no substantial evidence indicating that any of the exceptions to the categorical exemptions set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project. Therefore, the proposed project is exempt from CEQA.

Appendix 8

Comments and Response to Comments

Comment Letter #1 – South Los Angeles Community Co-Leads

Martha Dina Arguello and Paula Torrado Plazas, Physicians for Social Responsibility-Los Angeles (PSR-LA); Gina Charusombat, Strategic Concepts in Organizing and Policy Education (SCOPE); Jacquelyn Badejo and Linda Cleveland, Watts Clean Air and Energy Committee (WCAEC)

Executive Summary

1-1

Commented [1]: The entire Executive summary is missing the historical work of PSR-LA, SCOPE, and Watts in the community, and the efforts of SCLA-PUSH to ensure South LA was selected as an AB617 community. The work the SCLA-PUSH work did to ensure community members were trained and had tools to be part of the CSC.

Commented [2R1]: It also does a poor job of reflecting the work that it took community based organizations to get SLA selected under AB617.

1-2 Air pollution in South Central Los Angeles emanates from a variety of sources, both stationary and mobile. Nestled among residential homes, schools, recreational facilities, houses of worship and commercial establishments are auto body shops, metal manufacturing facilities, oil and gas extraction sites, chemical plants and other industrial land sites. Freeways and high-volume thoroughfares surround and crisscross this urban landscape. These pollution sources regularly emit harmful air pollutants and particles, often above regulatory health standards , when combined with other socio-economic and environmental determinants of health, significantly impact the health and well-being of South Central Los Angeles residents.

The South Los Angeles (SLA) Community Emissions Reduction Plan (CERP) is a critical part of implementing Assembly Bill 617 (AB 617),[1] a California law that addresses the disproportionate impacts of air pollution in environmental justice (EJ) communities. "Environmental justice" is defined as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."[2] The AB 617 program invests new resources. AB617 creates new opportunities for communities to be empowered and lead in the air quality policy/regulatory landscape. The program refocuses resources on improving air quality at the local level in EJ communities and directs regulatory agencies to work directly with communities to develop solutions.

1-3

Commented [3]: I am not sure this is accurate to say, necessarily, because AB617 funding comes from Cap and trade funding which was already existent, it was just redirected to create AB617

1-4

AB 617 communities are designated by California Air Resources Board (CARB) and they specify the plan(s) for the community as either an emissions reduction program, an air monitoring system, or both. South Central Los Angeles was selected as an official AB617 community after 3 years of the AB617 program implementation.

1-5

Within one year of an AB 617 community designation, the local air district must develop and adopt an emissions reduction program in collabration with CARB, community-based organizations, affected sources, and local governmental bodies, which must be implemented within five years.[3] The air monitoring system must be developed and deployed within one year of community designation.[4] An essential element of the program is partnership and collaboration with the community to address the community's air quality priorities and collectively develop respective solutions.

1-6

The Community Steering Committee (CSC) is a diverse group of people who live, work, own businesses, or attend school within the community. Additionally, local land-use agencies, public health agencies, regulatory agencies, and elected officials may have representation on the CSC.

[1] California Health and Safety Code, Section 44391.2
[2] California Government Code, Section 65040.12
[3] California Health and Safety Code, Section 44391.2 (b)
[4] California Health and Safety Code, Section 42705.5 (b)

The CSC guides the development and implementation of the emissions reduction program and air monitoring system.

After years of historical advocacy and recent organizing efforts led by Physicians for Social Responsibility Los Angeles (PSR-LA) and community based organizations such as Strategic Concepts in Organizing and Policy Education (SCOPE) and Watts Clean Air and Energy Committee (WCAEC) through their Community Air Protection Project SCLA-PUSH, South Los Angeles was selected as an AB617 community.

1-7 During the California Air Resources Board (CARB) meeting on February 25th, 2021, voted to select South Central Los Angeles for both a Community Emissions Reduction Plan (CERP) and a Community Air Monitoring Plan (CAMP).

Through a community visioning and planning process, SCLA-PUSH project members, South LA organizations, and residents started working together to produce a roadmap for achieving the transformation of South LA's air, primarily through creative technology solutions and innovation rooted in a Just Transition framework.

1-8 ~~On February 25, 2021, CARB designated SLA as an AB 617 community with both community plans, an emissions reduction program, and an air monitoring system.~~

This CERP serves as the emissions reduction program and outlines goals and actions by the CSC, South Coast Air Quality Management District (South Coast AQMD), and CARB to reduce air pollution in the SLA community. Additionally, a Community Air Monitoring Plan (CAMP) will be developed as the air monitoring system and will further explain air monitoring efforts included in this CERP. Findings from air monitoring will help to identify and evaluate next steps. South Coast AQMD will work with the CSC to review those findings and make necessary adjustments to implement the SLA CERP.

1-9 Physicians for Social Responsibility-Los Angeles (PSR-LA) along with Strategic Concepts in Organizing and Policy Education (SCOPE) and Watts Clean Air and Energy Committee (WCAEC) make up the South Los Angeles AB617 Community Steering Committee Co-leadership model in collaboration with the South Coast Air Quality Management District. Z

1-10 **Commented [4]:** This Co-leadership model is a case study as it is an AB617 first and approach to best practice.

Given these three organizations track record of success of over 20 years of experience in working in South LA organizing, building capacity, and advocating for solutions to the ongoing health threats linked to environmental justice issues in the community, they are co-leading this effort along with SCAQMD. This model was developed to ensure community voices are leading the process for identifying air quality priorities and emissions reduction strategies. The South Los Angeles AB 617 CSC co-leadership model was created and formulated by the community based organizations to ensure a meaningful community engagement process and create co-learning spaces for both community members and regulatory agencies that can amplify co-governance in the decision making process for the CERP and CAMP.

~~For this community, South Coast AQMD formulated a co-lead model to ensure that the development and implementation of the SLA CERP is a community-driven process. The three co-lead organizations are: Physicians for Social Responsibility-Los Angeles, Strategic Concepts in Organizing and Policy Education, and Watts Clean Air and Energy Committee.~~

~~Based on the sources of air pollution impacting the community, the SLA CSC identified the following air quality priorities to be addressed by this CERP:~~

- ~~Mobile Sources~~
- ~~Auto Body Shops~~
- ~~General Industrial Facilities~~
- ~~Metal Processing Facilities~~
- ~~Oil and Gas Industry~~

~~At its core, this CERP seeks to address these air quality priorities with actions that reduce air pollution emissions from sources within the community and reduce air pollution exposure for the people in the community. Actions in this plan include developing regulations to capture new sources of air pollution; enforcing rules to ensure compliance with existing regulations; providing incentives to accelerate the adoption of cleaner technologies; and conducting air monitoring to characterize emissions. These efforts will provide critical information to help guide investigations and provide public information. As well, conducting outreach will provide useful information to support the public in making informed choices. Collaborative efforts with other regulatory agencies, community-based organizations, businesses, and other stakeholders will amplify the impact of these actions. Many of the actions included in this CERP will only be conducted during the five-year implementation timeframe of this plan, which begins at CERP adoption. However, there are some actions (e.g., regulation, ongoing enforcement activities, and certain incentive programs) initiated during the implementation timeframe that will continue to result in emission and exposure reductions beyond the five-year timeframe of this CERP. The focus of this plan is to improve air quality in the SLA community through concentrated efforts and community partnerships.~~

The CSC, South Coast AQMD, and CARB will continue to engage in the process of implementing the CERP and tracking its progress during the five-year timeframe.

The Reader's Guide to this CERP

This CERP is organized into six chapters, containing background information and strategies for reducing exposure to air pollution in the SLA community:

- Chapter 1 – Introduction, provides background information about the AB 617 program and timeline;
    - Chapter 1 B - Goals and Targets of the CERP

1-11 **Commented [5]:** This is inaccurate, it was not SCAQMD who formulated this co-leadership model, it was us the community based organizations.

1-13

1-12 **Commented [6]:** why only? what happens after the 5 year mark?

Commented [7]: MOVE TO Chapter 1

1-14 **Commented [8]:** again co-leads are left out of the narrative

1-15 **Commented [9]:** Similar to West Oakland

- Chapter 2 – Community Outreach, Community Steering Committee, and Public Process, which details the CSC process and community engagement;
- Chapter 3
    - Chapter 3a – Community Profile, provides context in understanding attributes of the community, including a general overview of the community, a discussion of community issues, and a characterization of public health data to establish a current baseline and socioeconomic factors;
    - Chapter 3b – Emissions and Source Attribution, providing an overview of air pollution sources in the community;
- Chapter 4 – Enforcement Overview and History, provides information about past and ongoing enforcement activities conducted by both the South Coast AQMD and CARB; this information may provide insight(s) into future enforcement activities;
- Chapter 5 – Actions to Reduce Community Air Pollution, as identified by the CSC. Chapter 5 is organized by air quality priorities, followed by actions to address each air quality priority. The actions are organized in a table that identifies the entities responsible for each action and the implementation timeframe. This CERP will include a California Environmental Quality Act (CEQA) analysis based on the actions; and,
- Chapter 6 – Community Air Monitoring Plan (CAMP) Summary, is a detailed approach for air monitoring actions and activities described in Chapter 5.
- Chapter 7 - Just Transition and Community Projects , detailed South LA case studies that outline specific industries best practices and clean production actions to reduce emissions that can inform the AB617 implementation.

1-16

Commented [10]: Agree

- Chapter 8 describes methods to track implementation of the CERP strategies.

1-17

1-18 Appendices to the Plan present the….

1. Chapter 1: Introduction

Regulatory Background

Assembly Bill 617 (AB 617)[1] was signed into California law on July 26, 2017 and focused on addressing disproportionate impacts of local air pollution in environmental justice (EJ) communities. "Environmental justice" is defined as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."[2] The bill recognizes that while California has seen tremendous regional air quality improvement, some communities are still disproportionately impacted due to air pollution sources near residential areas. Major air pollution sources in EJ communities include mobile sources and industrial facilities. These communities also experience social and economic disadvantages that add to their cumulative burdens. The AB 617 program invests new resources and focuses on improving air quality in EJ communities.

AB 617 communities are designated by California Air Resources Board (CARB) and they specify the plan(s) for the community as either an emissions reduction program, air monitoring system, or both. To meet the emissions reduction program requirements, South Coast Air Quality Management District (South Coast AQMD) develops and implements Community Emission Reduction Plans (CERPs). For the air monitoring system requirements, South Coast AQMD develops and deploys Community Air Monitoring Plans (CAMPs). For communities with an emissions reduction program component, the local air district must develop and adopt a CERP in consultation with CARB, community-based organizations, affected sources, and local governmental bodies, which must be implemented within five years.[3] Additionally, air districts are required to provide an annual progress report to CARB[4] and if new information becomes available, the CERP may be evaluated and revised by CARB. For communities with an air monitoring system component, a CAMP must be developed and deployed within one year of community designation.[5]

An essential element of the program is partnership and collaboration with the community to address the community's air quality priorities and develop solutions and actions for the CERP and CAMP. The Community Steering Committee (CSC) is guided by the South LA Co-leadership model including PSR-LA, SCOPE, and Watts Clean Air in Collaboration. The CSC is a diverse group of people who live, work, own businesses, or attend school within the community, many of whom were trained as Air Quality Ambassadors through PSR-LA's Air Quality Academies as part of their SCLA-PUSH project. Additionally, local land-use agencies, public health agencies, regulatory agencies, and elected officials may have representation on the CSC. The CSC guides the development and implementation of the emissions reduction program and air monitoring system.

[1] California Health and Safety Code, Section 44391.2
[2] California Government Code, Section 65040.12
[3] California Health and Safety Code, Section 44391.2 (b)(2)
[4] California Health and Safety Code, Section 42705.5 (d)
[5] California Health and Safety Code, Section 42705.5 (b)

1-19 **Commented [1]:** If it is regulatory background, then maybe CapandTrade should be explained here - or at leas add a graphic timeline explaining how we got to AB617

1-20 **Commented [2]:** health, social, and economic

1-21 **Commented [3]:** is not new resources

Commented [4]: in consultation? or collaboration?

Commented [5R4]: should say collaboration. To me anything else would mean that we (co-leader/community) did not contribute. Just signed off.

1-22 **Commented [6R4]:** I agree!

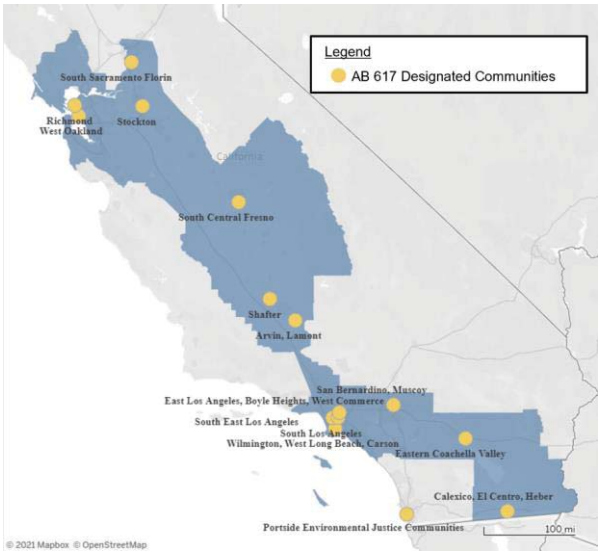
Commented [7]: community members

1-23 1-24

Currently, statewide, there are 15 AB 617 communities designated by CARB (see **Figure 1-1**) and six of the 15 communities reside within the jurisdiction of the South Coast AQMD. In 2018 (Year 1), CARB designated three South Coast AQMD communities. In 2019 (Year 2), CARB designated two[6] additional communities in South Coast AQMD. On February 25, 2021 (Year 3[7]), South Los Angeles (SLA) was designated by CARB as an AB 617 community in South Coast AQMD to develop a community emissions program and an air monitoring system.[8,9] This major success would have not been possible without the support of our SCLA-PUSH project and their dedicated community based organizations and experienced community members and Air Quality Ambassadors, who are now leading and forming the SLA CSC.

1-25

Figure 1-1: AB 617 Designated Communities



THE SLA CERP

NEW HEADER: Purpose

1-26

This CERP is developed to achieve air pollution emission and exposure reductions within the SLA community and address this community's air quality priorities. This plan also describes the community

[6] Eastern Coachella Valley and Southeast Los Angeles were designated in 2019 to develop both a community emissions program and air monitoring system. https://ww2.arb.ca.gov/capp-communities

[7] South Los Angeles is designated as a "2020" or "Year 3" community despite the CARB Board meeting for community selection being held in 2021, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/communities/south-los-angeles

[8] California Health and Safety Code, Section 44391.2 (c)(2)

[9] California Health and Safety Code, Section 42705.5 (d)

1-26 cont. outreach conducted to develop this CERP and provides emissions and exposure reduction actions, an implementation schedule, and an enforcement plan (Chapter 4).

NEW HEADER: Scope

Based on the sources of air pollution impacting the community, the SLA CSC identified the following air quality priorities to be addressed by this CERP:

	Mobile Sources
Chapter 2	Auto Body Shops
Chapter 3	General Industrial Facilities
Chapter 4	Metal Processing Facilities
Chapter 5	Oil and Gas Industry

At its core, this CERP seeks to address these air quality priorities with actions that reduce air pollution emissions from sources within the community and reduce air pollution exposure for the people in the community. Actions in this plan include:

1-27
- Developing regulations to capture new sources of air pollution;
- enforcing rules to ensure compliance with existing regulations;
- providing incentives to accelerate the adoption of cleaner technologies;
- and conducting air monitoring to characterize emissions.

These efforts will provide critical information to help guide investigations and provide public information. As well, conducting outreach will provide useful information to support the public in making informed choices. Collaborative efforts with other regulatory agencies, community-based organizations, businesses, and other stakeholders will amplify the impact of these actions. Many of the actions included in this CERP will only be conducted during the five-year implementation timeframe of this plan, which begins at CERP adoption. However, there are some actions (e.g., regulation, ongoing enforcement activities, and certain incentive programs) initiated during the implementation timeframe that will continue to result in emission and exposure reductions beyond the five-year timeframe of this CERP. The focus of this plan is to improve air quality in the SLA community through concentrated efforts and community partnerships.

Other Environmental Community Concerns Identified

1-28
- Placeholder for additional community concerns
- Placeholder for 4 drivers of disparities in South LA

Commented [8]: https://southlaisthefuture.org/south-central-rooted/

1-29 The Steering Committee also identified sources of pollution and other environmental hazards that are not included in the CERP's scope. The CERP does not study or attempt to address the background or regional sources of pollution that all South LA communities face. The CERP also does not seek to address the burdens that residents of South LA shoulder because of poverty, lack of economic and educational opportunities, illegal dumping, and excessive noise, although some of these current conditions are

1-29 cont.

described in the Community Profile (Chapter 3) and are part of the cumulative burden in the Soth LA community that are linked to air pollution.

~~AB 617 Program Challenges~~

~~Over the past four years of implementing the AB 617 program, South Coast AQMD has experienced challenges and gained insight on working with the designated communities and addressing their concerns. One of the common challenges for all AB 617 communities continues to be the emissions reduction program development timeline; one year to develop and adopt an emissions reduction program limits the ability to build community trust, inform the community, and build consensus. Another challenge is the limited authority of air districts to sufficiently address all air quality related issues raised by the CSCs. Limited funding has also been challenging to sufficiently support the development, implementation, and deployment of community plans.~~

1-30

~~Community Emissions Reduction Plan Development Process and Emphasis on Community Input~~

1-31

Community Emissions Reduction Plan Development and Community Engagement

Community engagement and input to inform both the process and the actions in a CERP are a primary element of the AB 617 program. Public meetings, subcommittee meetings, conversations, and communications among CSC members, the community, South Coast AQMD, and CARB staff contribute to developing and implementing this CERP. Chapter 2 – Community Outreach, Community Steering Committee and Public Process describes the CSC and outreach efforts for CERP development.

1-32

About this Community

On January 14, 2021, ~~South Coast AQMD initiated the Community Kickoff Meeting.~~ On January 14th, SCAQMD hosted a preliminary South LA AB617 informational session in preparation of the community

1-33

Commented [9]: Similar to West Oakland plan in page

Commented [10R9]: https://www.baaqmd.gov/~/media/files/ab617-community-health/west-oakland/100219-files/final-plan-vol-1-100219-pdf.pdf?la=en

Commented [11]: I think Chapter 3 (Community profile - should be chapter 2)

Commented [12]: These challenges focused only on the program implementation, we should also outlined challenges and lessons learned in our CSC process - add that on chapter 2

Commented [13]: Belongs in chapter 2

Commented [14]: Additional challenges:
-constrained timeline and capacity gaps
-communications and process transparency
-accountability

Commented [15]: This should be further described as part of chapter 2 for community engagement - a new section for Challenges and Lessons Learned

Commented [16R15]: Agreed

Commented [17]: in addition to lack of resources that adequately support co-leads engagement

Commented [18]: I don't think "input" fully describes the many hours community members have dedicated to this, is a vague word.

Commented [19]: I don't think this says much, its just fluff

Commented [20]: Not Accurate. This Jan 14th meeting was a pre-informational meeting because the SLA community was not officially selected until Feb 25th

Commented [21]: This is NOT true - On January 14TH SCAMD did an informational gathering for the South LA community

selection to inform the community about the program and the opportunities it brings to address air quality concerns.

On February 16th PSR-LA in collaboration with SCOPE and Watts Clean Air, the local air district and

January 2021	Community Kickoff Meeting
February 2021	CARB designated AB 617 Year 3 community
March - August 2021	Community Steering Committee (CSC) developed Community boundary finalized Air quality priorities identified
September 2021 - February 2022	Community subcommittees on air quality priorities and emissions inventory CERP development extension request submitted
March 2022	Preliminary Draft CERP released to CSC for review

1-34

CARB hosted an ***Air Quality Conference called "What's up with the air in South LA conference".*** There were 100+ attendees which included more than 60 community members, academic partners, city officials from LA Sanitation, LA Department of Health, and LA planning department, regulatory agencies representatives and board members from CARB and SCAQMD. The conference was held so community members in South LA could learn about Air Quality in South LA and the opportunity that AB617 brings to address air pollution and create spaces for meaningful community engagement. During this conference there was an opportunity for community members to directly ask questions to the regulatory agencies CARB and SCAQMD.

Commented [22]: https://www.youtube.com/watch?v=UpSAvGSqpSY

Commented [23R22]: for screenshots

On March 11th, SCAQMD hosted the official South LA Community kick off meeting in collaboration with PSR-LA, SCOPE, and Watts Clean Air who informed the development of the agenda and helped prepare community members for meaningful engagements.

~~Due to the COVID-19 pandemic, all meetings were held virtually via Zoom.~~

1-35

Commented [24]: This needs to be further expanded in the community outreach chapter 2

On February 25, 2021, SLA was designated by CARB as an AB 617 community. Since the designation, there have been a series of community meetings to develop the CERP and CAMP; see **Figure 1-2** for SLA's CERP development timeline.

Figure 1-2: South Los Angeles CERP Development Timeline

This community includes Compton, Lynwood, Watts, the unincorporated areas of Willowbrook and Westmont, and parts of Inglewood and Los Angeles (**Figure 1-3**).

1-36

Commented [25]: name all communities included in the boundaries

Figure 1-3: South Los Angeles Community Boundary

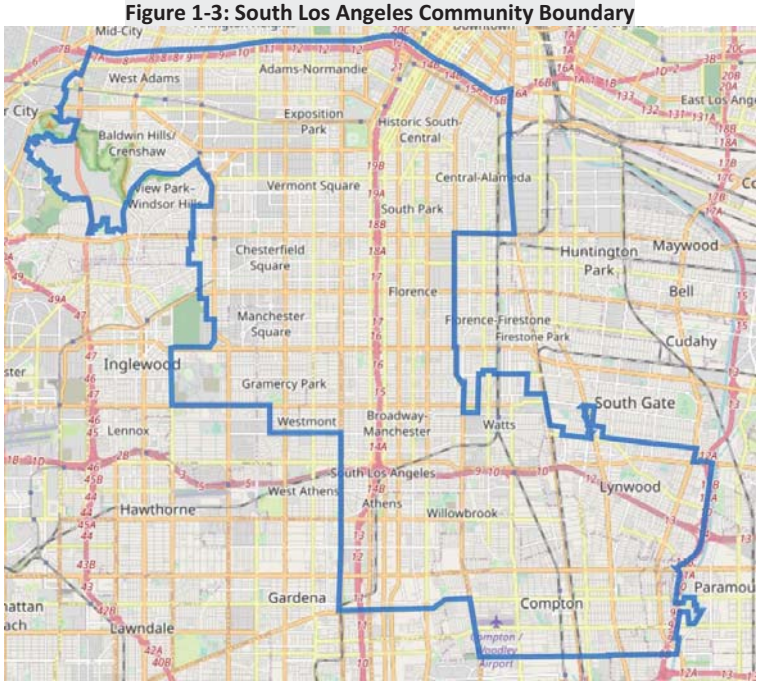
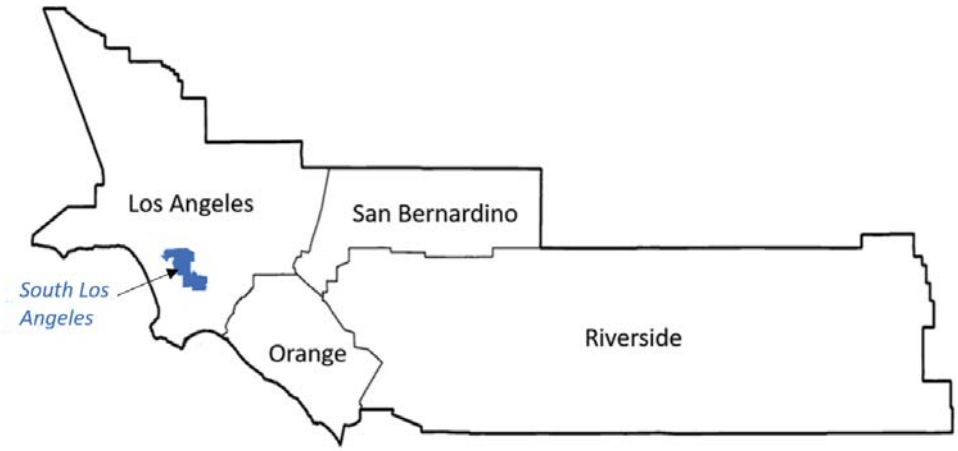


Figure 1-4: Location of the South Los Angeles Community within South Coast AQMD's Jurisdiction

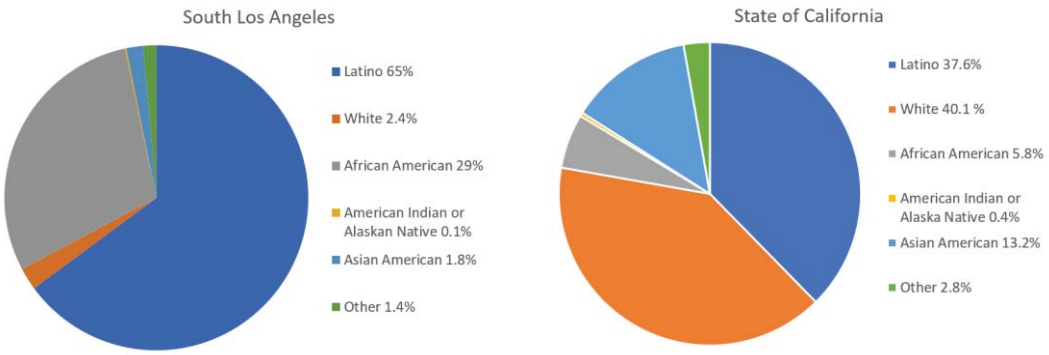
1-37

Commented [26]: Should also go on community profile chapter 3

Commented [27]: This belongs in the Chapter 3 - community profile - it doesnt flow well here



~~**Figure 1-5: Population by Race/Ethnicity in South Los Angeles and the State of California, based on 2010 Census**~~

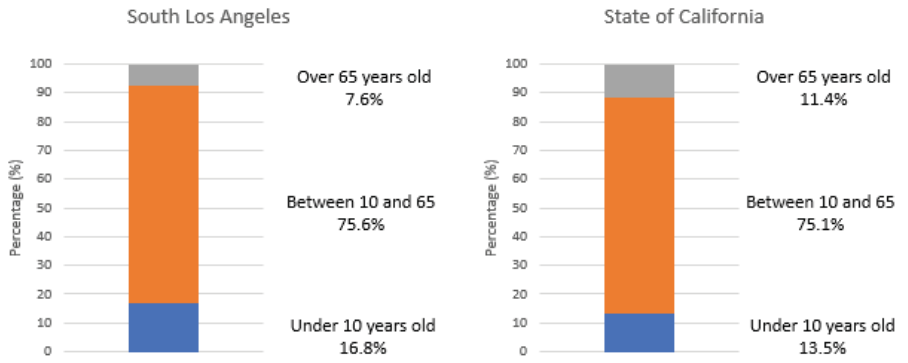


~~According to the 2010 Census, approximately 904,000 people live within the SLA boundary: approximately 65 percent are Hispanic or Latino, 29 percent are African American, and 2.4 percent are White (**Figure 1-5**).[10] Sensitive receptors are young children (under 10 years old) and older adults (over 65 years old) and can be more sensitive to air pollution's health effects. The population in this community~~

[10] Definitions of races are the same as version 3.0 of the California Communities Environmental Health Screening Tool (CalEnviroScreen 3.0), https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

~~is younger than the average California population, with about 16.8% of children under the age of 10 years and 7.6% adults over the age of 65 years versus the state which has 13.5% and 11.4%, respectively (**Figure 1-6**).~~

~~Figure 1-6: Age Profile in South Los Angeles and the State of California, based on 2010 Census~~



1-38

Commented [28]: Feels like this belongs in the Chapter 3 - community profile section instead

1-39 # Chapter 2: Community Outreach, Community Steering Committee, and Public Process

Commented [1]: Community Engagement

Commented [2R1]: Should be move to Chapter 3

Introduction

Chapter 2 Highlights

- The Community Steering Committee (CSC) and Community Co-Leads worked with South Coast AQMD staff to develop the CERP
- Due to the COVID-19 Stay-At-Home Order, regularly scheduled CSC meetings used a virtual platform to engage with the CSC and public
- The Community Liaison served as the point of contact
- The CSC Charter was developed by the Community Co-Leads, with input from the CSC

Community engagement, outreach, and public process were crucial to developing the South Los Angeles (SLA) Community Emission Reduction Plan (CERP). Key features of the outreach efforts include partnering with Community Co-Leads, establishing a Community Steering Committee (CSC), monthly CSC meetings, CSC member testimonials, South Coast AQMD staff presentations, providing materials (in English and Spanish) via email and web page, and live-streaming all CSC meetings (with English and Spanish interpretation). Also, numerous interactions between CSC members, Community Co-Leads, and South Coast AQMD staff occurred in one-on-one and/or small group meetings, allowing for in-depth discussions on joint development and CERP creation.

SLA Community Co-Leads

South Coast AQMD is partnered with three community organizations serving as co-leads for the development and implementation of the AB 617 Program in the SLA AB 617 Community. The co-lead organizations are:

- Physicians for Social Responsibility-Los Angeles (PSR-LA);
- Strategic Concepts in Organizing and Policy Education (SCOPE); and
- Watts Clean Air and Energy Committee.

PSR-LA is an organization that advocates for policies and practices that improve public health, the elimination of environmental and nuclear threats, and seeks to address health inequalities. PSR-LA has over a decade of experience working in the South Central Los Angeles (SCLA) community on toxics, air pollution and climate change, land use and community development, and oil and gas extraction. PSR-LA brings the strength and credibility of health professionals to local organizing efforts and regulatory action and advocacy.

1-40 SCOPE brings over a decade of historical social justice work in South Los Angeles addressing issues of poverty, environmental racism, and chronic disinvestment using a bottom-up approach

1-40 cont. to creating systemic change. SCOPE's proven model of community organizing is anchored by community residents engaging their neighbors to build a unified voice and advance a community led agenda. SCOPE builds grassroots power to create social and economic justice for low-income, women and women identifying, immigrant, black, and brown communities in Los Angeles. SCOPE organizes communities, develops leaders, collaborates through strategic alliances, builds capacity through training programs, and educates South LA's residents to have an active role in shaping policies that affect the quality of life in the region.

Watts Clean Air and Energy Committee empowers the Watts and surrounding South Los Angeles community/communities to achieve environmental justice by improving air quality and helping the community gain access to careers in the growing green energy industry. With daunting data on the rise in the era of competition between public utilities, the three founders knew that disadvantaged communities were in need of active community education and engagement around the larger picture of global warming, including air, energy and the value of natural resources.

Community Liaisons

A Community Liaison from the South Coast AQMD served as the point of contact to communicate with members of the CSC and members of the public to address concerns regarding logistics and development of both the CERP and Community Air Monitoring Plan (CAMP) (**FIGURE 2-1**). The Community Liaison ensured communication throughout the CERP development process and worked with community members to identify the best ways to make information accessible and user-friendly.

'The South Coast AQMD Community Liaison for SLA is Bernard Tolliver (btolliver@aqmd.gov), formerly, the liaison was Evangelina Barrera. Additionally, Nicole Silva (nsilva@aqmd.gov) serves as the South Coast AQMD point of contact for CERP-related discussions.

FIGURE 21: SOUTH COAST AQMD STAFF ASSISTING CSC MEMBERS AND THE PUBLIC VIA ZOOM

Community Steering Committee (CSC)

1-41 The main role of the CSC is to provide input and guidance in the process as well as to propose community driven solutions and actions for the community plans (i.e., CERP and CAMP). The CSC is composed of stakeholders with community knowledge to help drive community action and to develop the CERP and CAMP. The CSC creates a way to incorporate community expertise and direction in developing and implementing clean air programs in each community.

1-42

The SLA Community Co-leads developed a community outreach strategy to recruit community members and establish the SLA CSC. The SLA Co-leads brought a wealth of community contacts and active civic leadership to the outreach work and leveraged their existing relationships in the community.

PSR-LA's Community Air Protection SCLA-PUSH project in the community had already established trusted community leaders, which ensured the outreach process was successful because of their reputations and hard work. Many of the community members part of the CSC, are PSR-LA's SCLA-PUSH trained South LA air quality ambassadors.

Community co-leads also leveraged existing relationships within South LA to bring in community leaders to the CSC. Community partnerships to establish the CSC included:

1-43

- Esperanza Community Housing
- Standing Together Against Neighborhood Drilling-LA (STAND-LA)
- Watts Rising
- Brotherhood Crusades
- Slate Z
- SAJE
- Holman United Methodist Church
- Redeemer Community Partnership

Community co-leads know that the South LA community has a rich history of organizing and mobilizing for social justice and that collaborations among community based organizations are imperative to ensure inclusivity of all what South LA is. These partnerships meant expanded outreach and recruitment for the CSC. In addition, these organizations now have representatives in the SLA CSC and bring community expertise ranging from housing justice, transportation justice, environmental justice, community organizing, and civic leadership.

FIGURE 2-2: COMMUNITY STEERING COMMITTEE FIRST MEETING SLIDES

1-44 The CSC for SLA was initially formed in January and March of 2021. Beginning on April 1, 2021, monthly virtual meetings were held via Zoom. (**FIGURE 2-2**). Virtual meetings were held due to

Commented [3]: community leadership

Commented [4]: not accurate - CSC was formed in April , first kick off meeting was March 11th

1-44 cont. the COVID-19 pandemic and the resulting executive orders from the Governor[1]. Spanish
1-45 interpretation occurs during each virtual meeting, including teleconference capability for both English and Spanish lines, and meeting materials are provided in both languages.

1-46 ~~Staff will continue to seek recommendations and feedback from the CSC during CERP implementation and adjust the outreach approaches to be more effective.~~

The SLA CSC has 46 primary members and two alternate members representing active residents, community organizations, and businesses. Twenty-six are primary members who reside within the community (resident percentage on the CSC is 54 percent), three primary members and two alternate members represent agencies, schools/universities, or offices of elected officials who serve this community,[2] two primary members represent businesses or labor organizations, ten primary members represent community organizations, and five primary members are co-leads. The roster is available at: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/roster.pdf.

CSC Charter

1-47 ~~A charter was developed jointly by South Coast AQMD staff and~~ The SLA Community co-leads developed the CSC charter in collaboration with SCAQMD for the CSC and a draft was presented to members at the first meeting on April 1, 2021. CSC members were invited to comment and provide feedback before the charter was announced as final at the CSC meeting on July 22, 2021. The final charter is provided on the webpage: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/sla-charter.pdf.

~~Committee Presenters~~

1-48 ~~A critical aspect of the CERP is development and implementation through collaboration with committee members and the agencies, organizations, businesses, or other entities that they represent. Committee members were invited to share their work that is complementary to the actions being developed in the CERP, such as programs carried out by their organization that help address air quality issues in the community.~~

Community Meetings

1-49 CARB designated the SLA community for the AB 617 program in February 2021. The community co-leads and South Coast AQMD hosted community meetings on a regular basis via virtual meetings. This included kick-off meetings, a series of CSC meetings and Subcommittee meetings. Subcommittee meetings focused on specific topics, such as Oil and Gas and Mobile

[1] Governor Newsom issued Executive Order N-25-20 on March 12, 2020, and Executive Order N-29-20 on March 17, 2020.

[2] Per discussion with CARB staff, members representing agencies, schools, universities, hospitals, and offices of elected officials are not included in the calculation of resident percentage on the CSC.

Commented [5]: needs to be in a separate section in this chapter

Commented [6]: needs to be somewhere else

Commented [7]: not accurate, the Co-leads developed the charter with input from SCAQMD

Commented [8R7]: I think is important to differentiate this, because the co-leads labor and work on this is missed in the document overall, so we should highlight co-leads work overall

Commented [9]: what is this? presenters of what? does this mean community co-leads?

Sources, where CSC members participated in breakout room discussions to provide input on potential CERP actions.

South LA AB617 Community Informational Meeting ~~Kick-Off Meeting~~

1-50 The South LA Community Informational Meeting ~~Community Kick-Off Meeting for the S~~LA was held virtually on January 14, 2021. During this meeting, staff presented information about the AB 617 program, and explained the critical role of the CSC in the development and implementation of the CERP and CAMP. Collectively the Community Co-leads organized a total of 50 community residents to attend this meeting, so community members could learn about the next steps in the South LA AB617 official selection.

FIGURE 2-3*:* KICK-OFF MEETING

South LA Air Quality Conference: What's Up with the Air in South LA

1-51 On February 16th PSR-LA in collaboration with SCOPE and Watts Clean Air, the local air district and CARB hosted an ***Air Quality Conference called "What's up with the air in South LA conference".*** There were 100+ attendees which included more than 60 community members, academic partners, city officials from LA Sanitation, LA Department of Health, and LA planning department, regulatory agencies representatives and board members from CARB and SCAQMD. The conference was held so community members in South LA could learn about Air Quality in South LA and the opportunity that AB617 brings to address air pollution and create

1-51 cont. spaces for meaningful community engagement. During this conference there was an opportunity for community members to directly ask questions to the regulatory agencies CARB and SCAQMD.

South LA AB617 Community Kick Off Meeting

1-52 On March 11th, SCAQMD hosted the official South LA Community kick off meeting in collaboration with PSR-LA, SCOPE, and Watts Clean Air who informed the development of the agenda and helped prepare community members for meaningful engagements. During this initial meeting, community members were invited to fill out forms to express their interest in becoming a CSC member and were then notified by email or phone if they were selected to be a member or an alternate. Co-leads provided feedback on the final CSC roster.

Commented [10]: March 11th - Kick off meeting

Official First SLA AB617 CSC First Meeting

1-53 On April 1st, SCAQMD and the Community co-leds hosted the first CSC meeting with the official members' roster during which the co-leads were formally introduced and the CSC members had an initial discussion regarding the SLA community boundaries.

NEW HEADER: Community Engagement Timeline

Commented [11]: Needs to be updated - and can be reformatted to look like a timeline instead

1-54

January 2021	Community Kickoff Meeting
February 2021	CARB designated AB 617 Year 3 community
March - August 2021	Community Steering Committee (CSC) developed
September 2021 - February 2022	Community subcommittees on air quality priorities and emissions inventory
March 2022	Preliminary Draft CERP released to CSC for review

1-55 LOOKING AHEAD

Add projections for the future

CSC Meeting Facilitation

1-56 The Community co-leads decided to hire professional facilitators to support each Steering Committee meeting to address any power imbalance between the Air District and the

1-56 cont.

community. The facilitators' role was to maintain a positive working environment among meeting participants throughout the Plan development process. Facilitators that are trusted by the community are critical in alleviating community co-leads concerns that government entities, such as the Air District, have too much power in the CERP planning process. Having neutral facilitation fostered inclusivity and full participation by community members. The facilitators also structured each meeting to include a question and answer period to encourage public comments throughout the planning process. In addition, the facilitators guided the Steering Committee toward consensus on the CERP

Commented [12]: from West Oakland plan

Commented [13R12]: Agree. And the public voice should be recorded and considered whether a CSC member or not.

CSC meetings are facilitated by La Mikia Castillo of Castillo Consulting Partners (CCP). Castillo Consulting Partners is a community-based consulting firm that is dedicated to empowering diverse leaders to use their voices for systemic change.

CCP attended and facilitated CSC monthly meetings, and supported co-lead weekly meetings. CCP took a community driven approach to enhance ongoing participation and diverse perspectives from CSC members to develop the CERP for South LA. CCP prioritizes facilitating dialogue and shared decision-making between CSC members and agency staff as the group moves through the development process with the approach to ensure accountability of South Coast AQMD and community partners. CCP approaches all of the CSC meetings facilitation through a community-driven lens, which requires being prepared to engage in restorative practices, as needed, and proactively seek out ways to minimize/prevent power imbalances and enhance community participation.

1-57

Community Meetings Best Practices and Challenges

Due to the COVID-19 pandemic, all meetings were held virtually via Zoom.

As best practices

1-58

- language justice
- interpretation
- inclusive engagement and participation
- breakout sessions

Challenges

- on going pandemic impacts
- challenges of digital divide, zoom fatigue, etc.
- District organizational change

Social Media

All CSC meetings were live-streamed using Facebook Live (**FIGURE 2-4**). The links to the live-stream recording were also posted on the South Coast AQMD community webpage

(www.aqmd.gov/ab617/SLA), so that members who could not attend or view the meeting live could view the recorded video of the meeting. All CSC meetings are publicized on Instagram, Twitter, and Facebook, and are available in English and Spanish. Each video received more than 100 views.

FIGURE 2-4: SCREEN SHOT OF FACEBOOK LIVE RECORDING OF SLA CSC

Community Webpage

A community webpage (**FIGURE 2-5**) was created for the SLA community. The webpage includes information about upcoming meetings, meeting materials (flyers, agendas, presentations, handouts, live stream links, and meeting summaries). Additionally, the SLA community page includes interactive maps, the CSC roster, and the CAMP and CERP documents. All flyers, agendas, social media posts, presentations, and handouts to the CSC were made available in

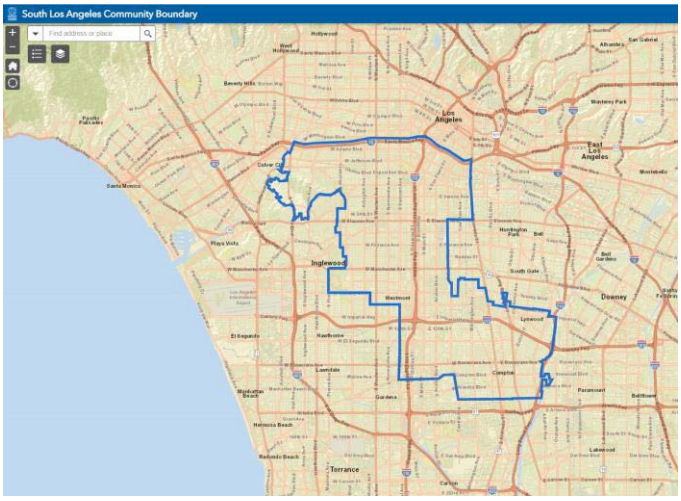
English and Spanish. Webpage: http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la.

The interactive maps on the webpage presented data about the community. **FIGURE 2-6** is an example of an interactive map that was created for the SLA community. These interactive maps provide data on land use, locations of facilities, schools, hospitals, daycare centers, and the air

FIGURE 2-5: COMMUNITY WEBPAGE FOR THE SLA COMMUNITY

quality concerns identified by the CSC and members of the public. This information was provided to help inform air quality priorities for the CERP for SLA.

FIGURE 2-6: MAP SHOWING THE SLA COMMUNITY BOUNDARY



Additional Community Engagement

~~In addition to establishing the CSC and convening monthly meetings,~~

Community co-leads also engaged in additional community outreach activities to ensure community members were informed of the AB617 process.

PSR-LA through the SCLA-PUSH project hosted several trainings, informational webinars, and conducted periodic phonebanking and outreach to ensure community members and CSC members were equipped with the tools to actively participate in the CSC meetings. Through this training and outreach capacity, PSR-LA has outreached to at least 100 community members in addition to leveraging existing relationships with community based organizations to keep them informed.

1-59

SCOPE

Watts Clean AIr through the SCLA-PUSH project, educational and interactive engagements, presentations to all players (residents, community groups, clergy/congregations, city/county/state/federal departments, schools, etc) and the use of multifaceted communications has facilitated awareness, support and surveyed input as we have leveraged other work to represent the whole of community with relative items such as water, soil, agriculture, education/workforce development, capacity building, etc to attempt an exhaustive effort of community engagement. Our stretch covers the entire South LA CSC boundary.

1-60 South Coast AQMD staff also participated in one-on-one or small group meetings with members, and attended meetings led by various community organizations. These meetings provide committee members an opportunity to communicate directly with staff and for staff to answer questions and clarify information requested from CSC members. Staff were able to gain a better

Commented [14]: need to also include co-leads efforts here

understanding of the unique issues faced by each community by attending and participating in meetings led by community organizations.

1-61 Broader public engagement is important to the AB 617 program. Every CSC meeting agenda includes an opportunity for committee members to suggest agenda items to collaborate on agendas for upcoming meetings. Staff reviews comments after each CSC meeting and responds as needed. (**FIGURE 2-7**).

Commented [15]: I don't remember this actually happening

Commented [16R15]: if its co-leads yes, but not csc members

FIGURE 2-7: COMMUNITY MEMBERS ARE INVITED TO SHARE COMMUNITY INFORMATION ON AIR POLLUTION CONCERNS

1-62 ~~Throughout the development of the CERP, community liaisons and various staff met with community members, environmental justice organizations, industry, and other stakeholders to provide assistance and prompt response to concerns raised about the CSC process.~~ Community liaisons also attended meetings from local organizations, environmental justice groups, and city and county governments to promote participation in the development and implementation of the CERP. 1-63 ~~Staff attended meetings hosted by other entities in this community to give presentations on AB 617 CERP development and had more than 35 in person, phone, and virtual meetings with committee members to discuss the CSC process and seek input on CERP actions.~~

Commented [17]: repetitive

Commented [18]: in person?

Commented [19]: repetitive

South Coast AQMD staff will continue to work with the CSC to implement the CERP actions and provide periodic community updates on implementing the plan. Community engagement is essential to the success of the CERP and the AB 617 program as a whole, and all parties are committed to building and improving upon existing outreach efforts.

Chapter 3a: Community Profile

Introduction

This community profile describes the characteristics of South Los Angeles (SLA) and the sources of air pollution that impact the community, which is crucial to addressing the air quality priorities outlined in Chapter 5 – Actions to Reduce Community Air Pollution.

Community Boundary and Air Quality Priorities

During monthly Community Steering Committee (CSC) meetings, CSC members, members of the public, California Air Resources Board (CARB), and South Coast Air Quality Management District (South Coast AQMD) staff worked together to shape the elements and actions of this Community Emissions Reduction Plan (CERP). Topics discussed with the CSC include:

- What should be the community boundary?
- What air quality concerns does the community have?
- What are the top air quality priorities that the community would like to address through this CERP?
- What should the goals for the air quality priorities include?
- What priority actions should be included in this CERP?
- Does the CSC have additional feedback on the Preliminary Draft CERP?

figure : South Los Angeles Community Boundary

1-64 This community includes Compton, Lynwood, Watts, the unincorporated areas of Willowbrook and Westmont, and parts of Inglewood and Los Angeles

1-65 It is important to note that South LA community boundaries have historically been established arbitrarily by city jurisdictions, and do not reflect the residents' own conception of their community. By community standards, South LA also includes the communities of Watts, Compton, Lynwood, Leimert Park, Crenshaw, Jefferson Park, West Adams, Athens, Westmont, Willobrook. The South LA community boundaries are intersected by high volume highways including the I-10, I-105, I-110, the 405, and the 91 Freeway.

Commented [1]: name all communities or boundaries.

Commented [2R1]: It is important to note that South LA community boundaries have historically been established arbitrarily by city jurisdictions, and do not reflect the residents' own conception of their community. By community standards, South LA also includes the communities of Watts, Compton, Lynwood, Leimert Park, Crenshaw, Jefferson Park, and West Adams. The South LA community boundaries are intersected by high volume highways including the I-10, I-105, I-110, and the 405.

Commented [3R1]: Athens, Westmont, Willowbrook

Commented [4R1]: 91Frreway

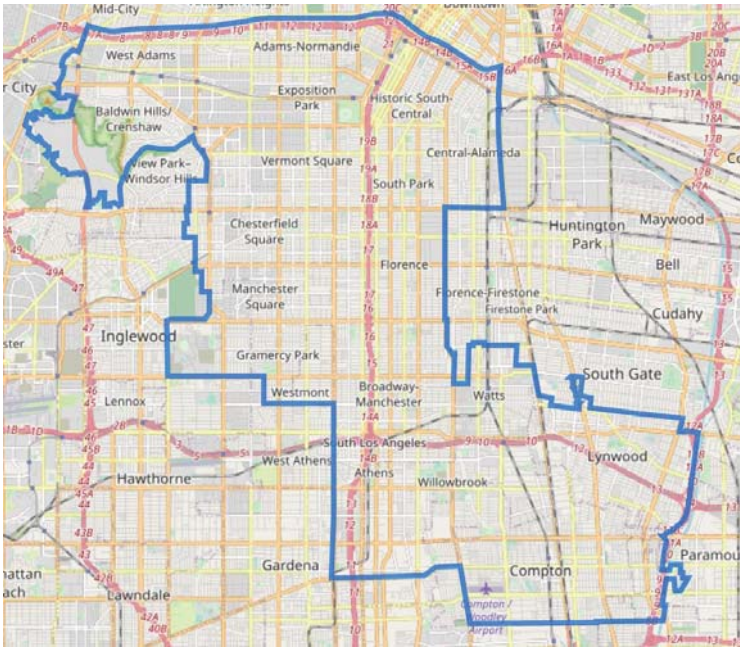


Figure 1-4: Location of the South Los Angeles Community within South Coast AQMD's Jurisdiction

1-66

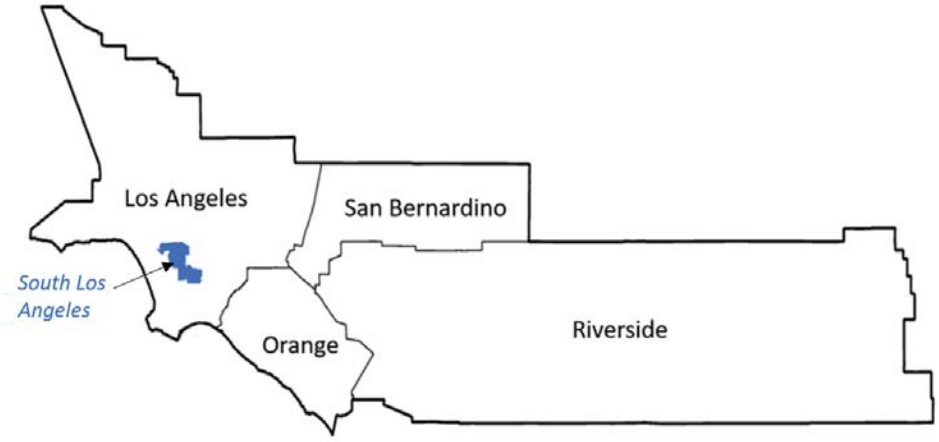
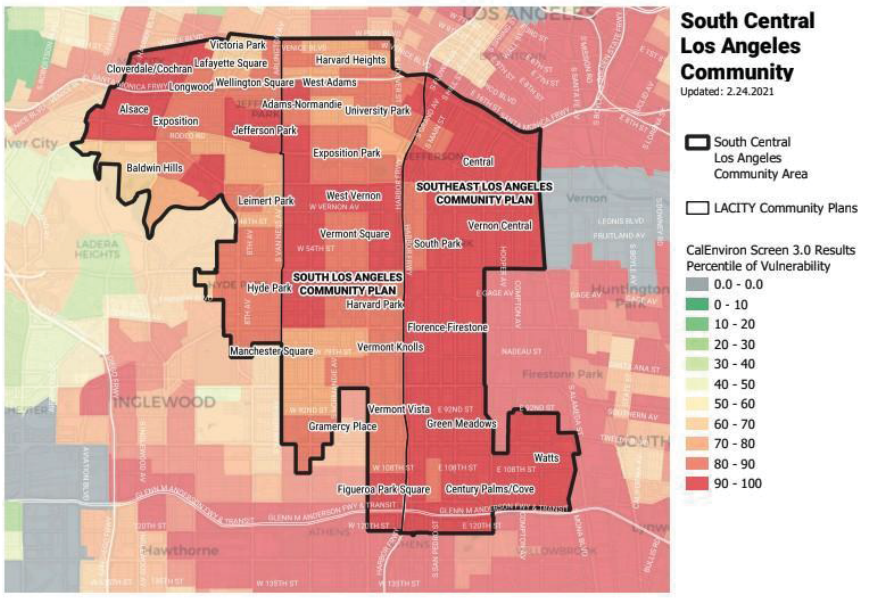


Figure 3a-1: South Los Angeles Community Boundary

Update map to include CES:

1-67



The community boundary to represent the SLA community selected by CSC members is important as it will be the area of focus for the community plans (CERP and Community Air Monitoring Plan (CAMP)) (Figure 3a-1). The SLA community boundary focuses on places in the community where residents live, work, attend school, and spend most of their time.

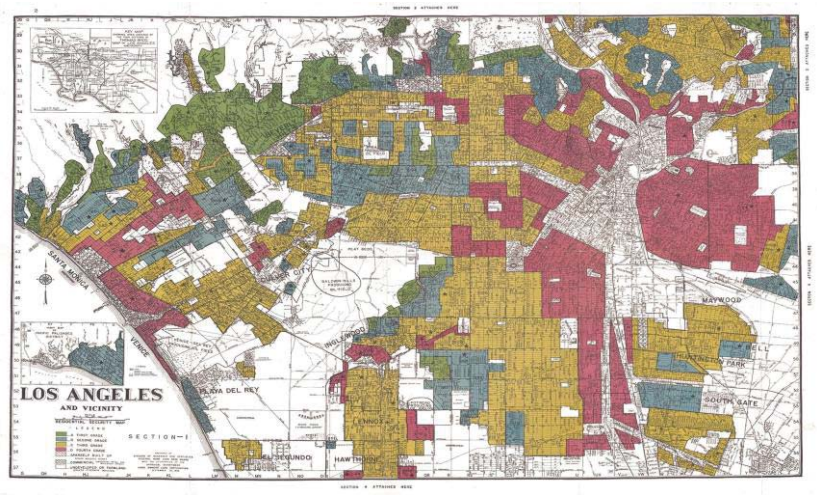
1-68 It is important to note that South LA community boundaries have historically been established arbitrarily by city jurisdictions, and do not reflect the residents' own conception of their community. By community standards, South LA also includes the communities of Watts, Compton, Lynwood, Leimert Park, Crenshaw, Jefferson Park, and West Adams. The South LA community boundaries are intersected by high volume highways including the I-10, I-105, I-110, and the 405.

1-69 **South LA History and Background**

South Los Angeles is the traditional land of the Tongva and Gabrielino peoples, original caretakers of the Tongva land (The LA Basin). South LA is a historic Black community that has a rich history shaped by immigration, shifts in labor markets, and housing policy that have led to economic displacement and gentrification. Social forces, discriminatory practices such as redlining and environmental racism, immigration, changing heritage, and community fights for justice have shaped the broader narrative of South LA. The South LA community is now predominantly Black and Brown and low-income with a variety of backgrounds and stories.

History of redlining in South LA

1-69 cont.



Early 20th century: Discriminatory real estate practices such as redlining cemented a pattern of exclusionary development that allowed for White home ownership in suburban neighborhoods of Los Angeles, while concentrating industrial activity in nonWhite and immigrant neighborhoods, including in and around South LA. During this time of rapid growth, several national firms established plants: Goodyear, Firestone, Phelps Dodge, and U.S. Steel.

These environmental racist planning practices left a legacy of staggering environmental health and justice problems that are impacting the community on a daily basis, including the co-location of industrial facilities, continued oil extraction, poor air, contaminated land, and poor urban infrastructure. Today, the South LA community continues to battle ongoing environmental injustices, while demonstrating tremendous power through impactful activism and community-wide mobilizations. The following brief timeline of the history that led up to the launch AB617 reflects the two sides of the environmental justice struggle: the legacy of poor air quality and environmental racism on the one hand, and energetic and impactful South LA movement building on the other.

1-70 Add timeline

Commented [5]: the Wilmington CERP had a great timeline on page 37 that visually explained the CERP process and how that relates to the CSC. This would be a helpful input for community members who are reading this document

South LA Today

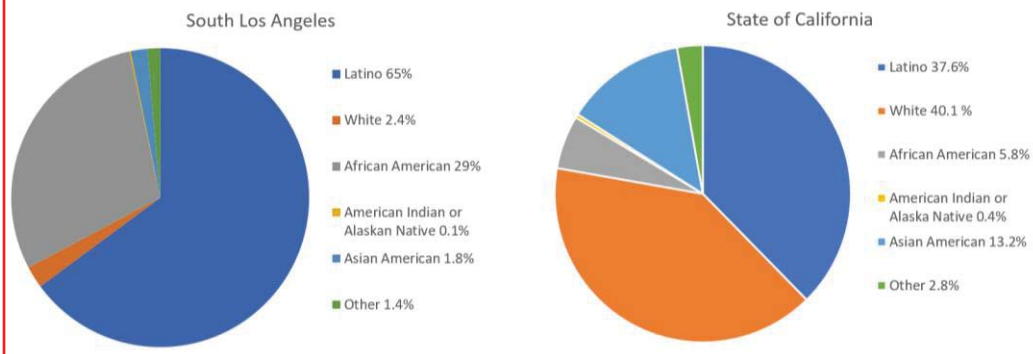
1-71 South LA is home to more than half a million people in about 30 square miles of land. These communities face multiple, synergistic and cumulative stressors, and hazardous exposures that, when combined with existing vulnerability, lead to adverse health consequences.

Population Characteristics

1-72 Approximately 40% Black or African American and 60% Non-Black and Black Hispanic or Latino. Predominantly low income community

Figure 1-5: Population by Race/Ethnicity in South Los Angeles and the State of California, based on 2010 Census

1-73

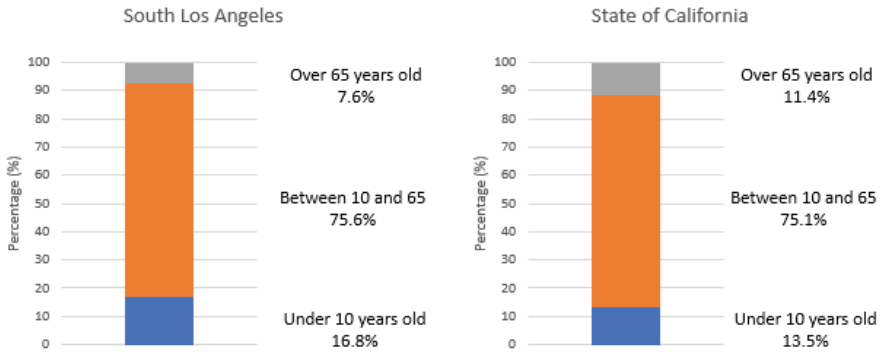


According to the 2010 Census, approximately 904,000 people live within the SLA boundary: approximately 65 percent are Hispanic or Latino, 29 percent are African American, and 2.4 percent are White (Figure 1-5).[1] Sensitive receptors are young children (under 10 years old) and older adults (over 65 years old) and can be more sensitive to air pollution's health effects. The population in this community is younger than the average California population, with about 16.8% of children under the age of 10 years and 7.6% adults over the age of 65 years versus the state which has 13.5% and 11.4%, respectively (Figure 1-6).

Figure 1-6: Age Profile in South Los Angeles and the State of California, based on 2010 Census

[1] Definitions of races are the same as version 3.0 of the California Communities Environmental Health Screening Tool (CalEnviroScreen 3.0), https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

1-73 cont.



1-74

Air Quality Profile

South Central Los Angeles communities are breathing some of the most polluted air in California and the country. Approximately half of census tracts in the community score in the 93rd percentile for Particulate Matter 2.5, and the remaining score in the 82nd percentile. The majority of the community scores in the 79th percentile for diesel and 53rd percentile for ozone.2 While state databases, alongside numerous studies, reveal the presence of all six criteria air pollutants regulated by the EPA in South Central LA (i.e., particulate pollution, ground-level ozone, lead, carbon monoxide, nitrogen oxides and sulfur oxides),

1-75

Pollution Sources/Pollutants of concern

Add CalEnviroScreen Maps with air quality data

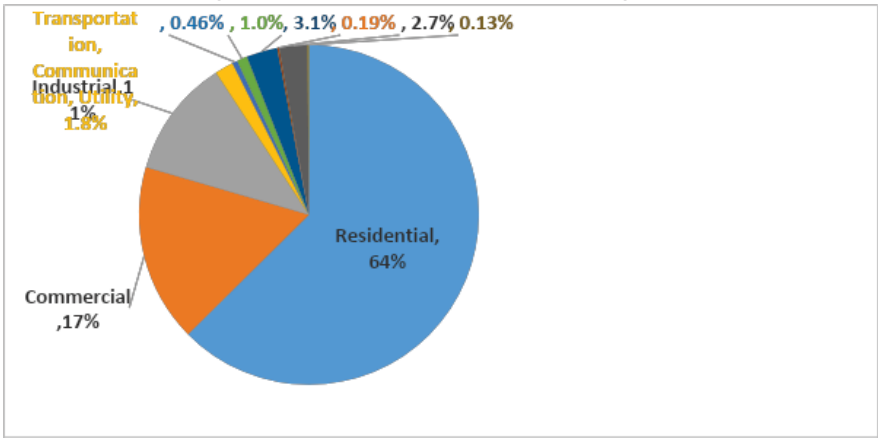
1-76

Community Land Use Profile

The SLA community boundary includes a land area of 63.5 square miles; about 64% of this land area is used for residential living, 17% is zoned for commercial uses, 11% is zoned for industrial uses, and 1.8% is used for freeways, roadways, and utilities and communications services (Figure 3a-2).[1]

[1] Land use refers to how certain areas of land are classified for development and use. Land use data is often used for city or county planning, such as the placement of housing developments and transportation hubs. Land use data is derived from the 2016 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy, which is based on 2012 data.

Figure 3a-2: Land Use Profile in South Los Angeles*



* Values may not sum to 100% due to rounding.

1-77 Air quality is intrinsically linked to land-use patterns where the designation of land often dictates the type of industry located there. Historically city planning did not prioritize the separation of hazardous land uses from sensitive populations. As such, the result is clusters of incompatible land uses that are disproportionately concentrated in South LA. In 2013, more than 21,000 Southeast LA residents lived within 500 feet of a major truck route and other unwanted land uses, such as manufacturing, oil refining and chemical plants.

1-78 Add infographic of a list of key stationary sources with associated pollutants of concern, and assigned regulatory program

Commented [6]: make sure the assigned regulatory programs have descriptions so it doesn't just say "rule_"

1-79 Add Map of mobile sources of concern - highlighting the major high volume highways, and if known add major truck routes that are criss-crossing the community, and also railyards.

After finalizing the community boundary, the CSC discussed their air quality concerns and identified a set of air quality priorities. The CSC built consensus to determine the top air quality priorities and the actions necessary to address them. The top air quality priorities for the SLA community are:

- Mobile Sources,
- Auto Body Shops,
- General Industrial Facilities,
- Metals Facilities, and
- Oil and Gas Industry.

The actions to address each air quality priority are described in Chapter 5.

1-80 **Add a Map for each pollution source of concern - identified by CSC.**

Health Profile

1-81
- Add health indicators
- Asthma rates
- Cardiovascular
- Cancer risk - Mates IV
- Add CalEnviroScreen Health maps

Cumulative Burden

1-82 South LA census tracts consistently and overwhelmingly score in the top 5-10% of the most vulnerable communities, according to CalEnviroScreen 3.0

- Add maps

Community Impacts from the Community Perspective

While this section provides an overview of the SLA community, the community members make this community unique and distinct. Community members bring intimate familiarity with their community and the air quality concerns that affect their neighborhood. Below is a community voice that describes their community.

Community Co-leads
PSR-LA

1-83 *"To transform the legacy environmental racism in the community of South LA, we must focus on delivering real emissions reductions and aim at moving upstream policy solutions that prioritize improving the quality of lives for South Los Angeles residents, we must also transform the practices of the agencies meant to clean our air.*
-Martha Dina Arguello, PSR-LA AB617 CSC Co-lead

"South LA communities continue to experience the health impacts of legacy air pollution and cannot wait any longer for real solutions that tackle the root causes of pollution burden and get to tangible emissions reduction . We need to start moving community driven solutions that are rooted in the Environmental Justice and precautionary principles and can support a just transition towards clean production for a thriving and healthier South LA"
- Paula Torrado Plazas, PSR-LA SLA AB617 CSC Co-lead

1-83 cont.

"My community is in jeopardy of extinction. Our children are experiencing health disparities at an alarming rate. Governmental agencies are always testing, running experiments in our neighborhoods and not providing solutions to the issues that are discovered. Just giving themselves ammunition for the next grant opportunity. Our lives are not valued. It's always about the quick fix or finding room for the next bandaid. EJ advocacy has turned into one big joke for the systemic systems that are ingrained into society Lord help us! Just tired of our Community being lab rats."
-Linda Cleveland, Watts Clean Air and Energy Committee, AB617 CSC Co-Lead

"Climate change is real and the sooner we incorporate citizen science and engagement, coordinated strategies and inclusive timelines and efforts across intergovernmental relations and communication, and fill the gaps of process, technology and access to ground truthing and resources that mirror best practice, only then will communities become a healthy biodiverse ecosystem where the human right to breath air can live and increase the quality of life for residents."
-Jacquelyn Badejo, Watts Clean Air and Energy Committee, AB617 SLA CSC Co-lead

"The South Los Angeles community should have the opportunity to breath clean free air. So as a resident, a business, and a church, we have the responsibility to clear the air. Let's live futuristic in a healthier and safe environment."

- Pastor Patricia Strong-Fargas, Resident of South Los Angeles

Chapter 3b: Emissions and Source Attribution

Introduction

Chapter 3B Highlights

- Information about the sources of air pollution in this community is presented in a "source attribution" analysis
- Diesel particulate matter is currently the main air toxic pollutant in this community, and it comes mostly from on-road and off-road mobile sources
- Other key air toxic pollutants in this community are 1,3-butadiene and benzene
- In future years, diesel emissions will decrease substantially due to ongoing and newly proposed regulations, but these emissions continue to be the main driver of air toxics cancer risk in this community

The Community Emission Reduction Plan (CERP) identifies air quality priorities based on community input and evaluation of technical data on emission sources in the community. The CERP defines actions and strategies to reduce the emissions and exposure burden from sources of criteria air pollutants and toxic air contaminants. To accurately determine emission reductions from these actions and strategies, a baseline reference needs to be established. The baseline reference can be achieved through an emissions inventory that includes an accounting of sources and their resulting emissions. This rigorous accounting of sources, their emissions and their contribution to cumulative exposure burden is what the CARB guidelines identify as a source attribution analysis. Per the direction of CARB guidelines, source attribution is required to meet the following AB 617 statutory requirements:

California Health and Safety Code § 44391.2 (b) (2) directs CARB to provide "[a] methodology for assessing and identifying the contributing sources or categories of sources, including, but not limited to, stationary and mobile sources, and an estimate of their relative contribution to elevated exposure to air pollution in impacted communities…"

The emissions inventory presented here is consistent with CARB recommendations for conducting a source attribution analysis. This approach is considered best for the South Los Angeles (SLA) community based on the availability of data and resources. Also, it includes an emphasis on identifying sources within the community. More information on source attribution methods is included in the Source Attribution Methodology report.[1] The most recent

[1] Methodology for Source Attribution Analyses for the first year AB 617 Communities in the South Coast Air Basin (Technical Report), 2019, http://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/source-attribution-methodology.pdf

1-84 **Commented [1]:** overall this is a very confusing chapter that does not flow well. seems like all sources are cramped together in long paragraphs and is really hard to follow. sources attribution should be separated by specific sources and then by pollutants. comparisons made pollutant to other pollutant are not clear. the future emissions projections graphs are not intuitive. technical language needs to be explained. programs, legislations, rules, and reports referenced here need to be further explained. Also, the lack of graphics and visuals makes this an even harder read. Refer to west Oakland plan pages 55 to 65

1-85 **Commented [2]:** I am not sure about the statement in the 3rd bullet, how do we know they will decrease and by how much? it seems vague to add that without knowing the baseline

1-86 **Commented [3]:** clarify how much (if any) of this emissions inventory uses measurements of air pollution

Commented [4]: Agreed to all of the comments.

1-87 **Commented [5]:** is this necessary to add?

1-88 **Commented [6]:** I don't understand this statement.

comprehensive air quality and toxics modeling analysis in the region was conducted as part of the fifth Multiple Air Toxics Exposure Study (MATES V)[2] released in August 2021.

This study showed Diesel Particulate Matter (DPM) was the air pollutant that contributed most to air toxics cancer risks in the South Coast AQMD.

1-89

There are areas within the SLA community with significantly higher air toxics cancer risks compared to the average of the Basin. Air toxics cancer risks in SLA range from about 435 per million to about 700 per million, while the average across the Basin is about 455 per million.

1-90

1-91

Can this be broken down into sections - mobile sources, and stationary sources emissions? its a difficult read as it is.

Sources of air pollution

- Mobile sources
- Stationary sources

Permitted facilities:

- Auto Body Shops
- General Industrial Facilities
- Metal Processing Facilities
- Oil and Gas Industry

1-92

Pollutants of Concern and Community Impacts Background

- Criteria air pollutants
  - PM - PM 2.5, PM10, and DPM
  - NOX
  - Ozone
- Air Toxics
  - BTEX
  - VOC's
  - Hexavalent Chromium
  - Lead

Commented [7]: Highlight this more - make it into a graphic that is more visual

Commented [8R7]: and show the Mates vs the CalEnviro Screen DPM maps of South LA

Commented [9]: a map with details about why (more freeways & trucks? big facilities?) would be helpful to illustrate this point

Commented [10]: I think this needs to further explained - more visually explained perhaps with a graphic -what is a cancer risk of 435 per million mean - perhaps make a comparison or show what an "acceptable risk" is 1 in 1,000,000

Commented [11]: further explain mobile sources and CARB's authority

Commented [12]: further explained permitted facilities and local air districts' role

Commented [13]: explain each further, and with graphics

Commented [14R13]: explain EPA NAAQS

Commented [15R13]: and thresholds for each

[2] The Multiple Air Toxics Exposure Study V (MATES V), August 2019, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

1-93 New Header: Emissions Sources Attribution Background

- Add table distinguishing Mobile sources / stationary sources in SLA

1-94 New Header: Mobile Sources Emissions Attribution

The SLA community contains many known sources of air pollution, including the I-10, I-110, I-105 and I-710 freeways and the Alameda Corridor rail line. The community also includes a wide range of industrial facilities, including those that conduct metal processing, surface coatings, auto body shops, and warehousing that attracts heavy-duty truck traffic. The source attribution analysis (discussed in the next section) highlights that in the year 2019, DPM had the highest contribution to the community's overall air toxics inventory. On-road and off-road mobile sources were the predominant sources of DPM, with the major contributors being off-road diesel equipment, heavy duty trucks, and trains.

In this community, 1,3-butadiene is the second largest contributor, which is largely emitted from gasoline-powered mobile sources and from the chemical and plastics industry. Projected emissions in future years show decreases in DPM emissions, although DPM continues to be the main contributor to the cancer risk.

In this community, on-road mobile sources are the largest emitters of NOx, with heavy-duty trucks being the largest contributor. Off-road mobile sources are the second largest contributor to NOx and include off-road equipment and trains.

Mobile sources contribute to the remaining third of the VOC emissions, with light-duty vehicle exhaust and evaporative emissions being the largest contributor.

The following sections provide more details on the main sources of criteria pollutants and air toxics in the community.

Base Year Emissions Inventory and Source Attribution

A variety of sources contribute to the emissions of criteria pollutants in the SLA community (**Figure 3b-1**, **Figure 3b-2**, **Figure 3b-3**). ~~Emissions of nitrogen oxides (NOx) are related to combustion sources and are an important contributor to the regional formation of ozone and particulate matter with a diameter of 2.5 micrometers or smaller (PM2.5).~~

1-102 New Header: Stationary Sources Emissions Attribution

Commented [16]: explain nuisance that the emissions inventories are self reported by industries which can contribute to data gaps and it does not include permitted small sources of pollution that are not required to report emissions - which can contribute to missed data and mischaracterization of air pollution levels.

Commented [17]: similar to West Oakland CERP - page 47 - 50 https://www.baaqmd.gov/~/media/files/ab617-community-health/west-oakland/100219-files/final-plan-vol-1-100219-pdf.pdf?la=en

Commented [18]: add images of these

1-95 **Commented [19R18]:** also break down paragraphs, some are really long and important information is lost

1-96 **Commented [20]:** I think it would be helpful if "on-road" and "off road" were defined with specific examples

Commented [21]: make this pop up more - a graphic

1-97 **Commented [22]:** Why? if this is not going to be further explained, then better not to add it

1-98 **Commented [23]:** moved this to the mobile sources attribution section

1-99 **Commented [24]:** moved this up

1-100 **Commented [25]:** I think it might make for an easier read if the sources each had their own section instead of having them all in this one large section. That way, each source has a little more focus and gives more space for specific data

Commented [26]: I don't understand this title

1-101 **Commented [27]:** move this up to the section Pollutants of Concern and Community Impacts Background

Stationary sources of NOx are mainly from fuel combustion in industrial activities and for space and water heating at commercial businesses and homes.

Area sources[3] contribute to two thirds of volatile organic compound (VOC) emissions. VOCs include a broad array of different pollutants, some of which are toxic, but also broadly contribute to regional ozone and PM2.5 formation. Solvent evaporation (mostly from consumer products and architectural coatings), and emissions from processes related to cleaning and surface coatings are the largest contributors in the SLA community.

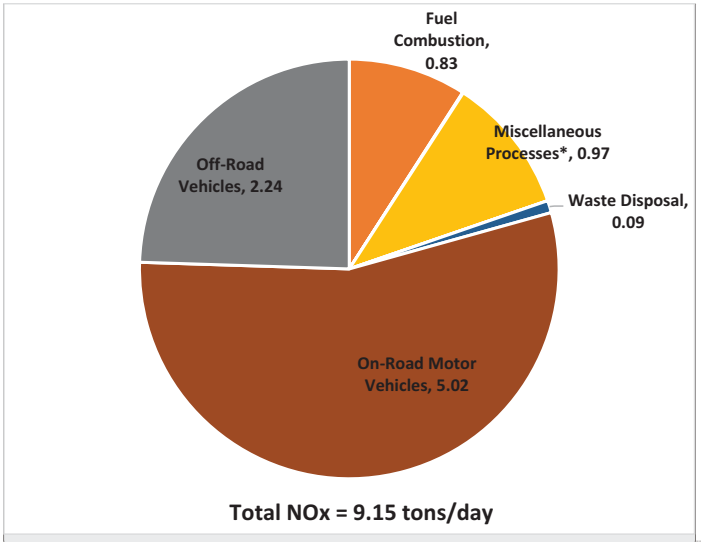
1-103 **Commented [28]:** what are these? explain or add visuals

Area and stationary point sources are also the largest contributors to PM2.5 emissions. Commercial cooking, fuel combustion in residential, commercial and industrial sectors, and manufacturing are the major stationary sources. PM2.5 is also emitted from vehicle exhaust and tire and brake wear. Paved road dust is also related to vehicles traveling on roads but is considered as a stationary area source and included in the "Miscellaneous" category.

1-104 **Commented [29]:** visuals

Figure 3b-1: Contribution of Major Source Categories to Nitrogen Oxides (NOx) Emissions in the SLA Community in 2019 (tons/day)

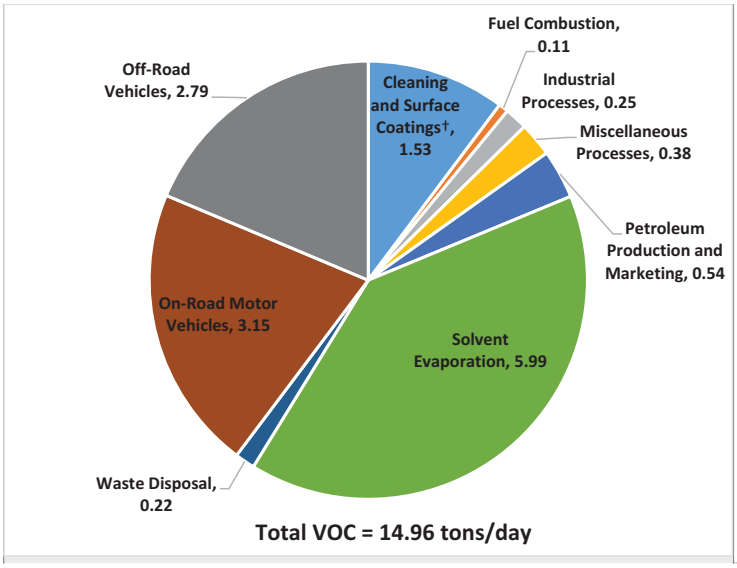
1-105 **Commented [30]:** Maybe a bar graph will be easier to understand



*Miscellaneous Processes include non-combustion sources (e.g., road and construction dust)

[3] Area sources includes emission sources used in many unspecified locations across a community, like residential fuel combustion (like natural gas-fired water heaters, stoves, or gas-power lawn and garden equipment, etc.) and consumer products (for example personal care products like hairspray), etc.

Figure 3b-2: Contribution of Major Source Categories to Volatile Organic Compound (VOC) Emissions in the SLA Community in 2019 (tons/day)

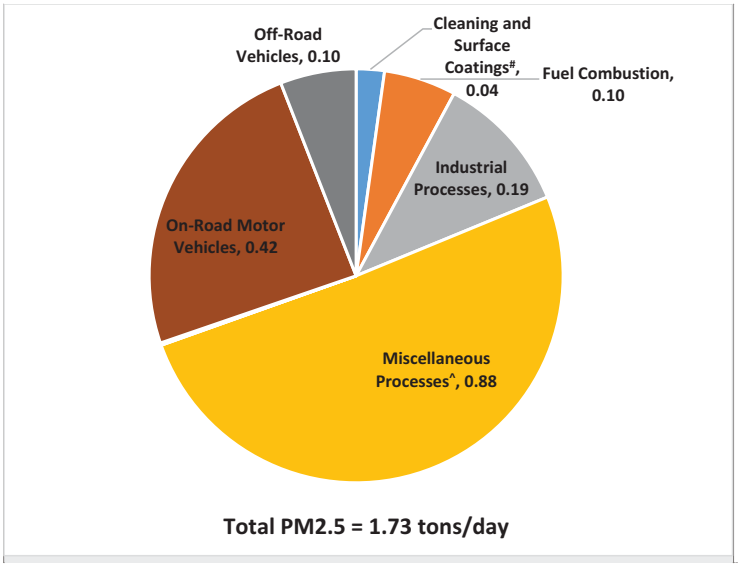


†Cleaning and surface coatings includes laundering, degreasing, coatings and related process solvents, and adhesives and sealants. Solvent evaporation is about 95% consumer products, and the rest is architectural coatings and other smaller sources.

1-106 **Commented [31]:** this visual and the following visual regarding PM2.5 emissions should be side-by-side

1-107 **Commented [32]:** bar graph

Figure 3b-3: Contribution of Major Source Categories to Particulate Matter 2.5 (PM2.5) Emissions in the SLA Community in 2019 (tons/day)



1-107 cont. **Commented [33]:** bar graph

#PM2.5 from cleaning and surface coatings include auto body shop type of sources (e.g., auto refinishing and metal coatings).
^Miscellaneous processes include non-combustion sources like road and construction dust.

1-108 **Commented [34]:** include a map or some kind of accounting of these sources. how many, where, what kind, etc.

1-109 New header: Toxic Air Contaminants Emissions

Toxic air contaminant emissions from the largest point sources in the community were compiled from the emissions reported by facilities to South Coast AQMD's Annual Emissions Reporting program. Toxic air contaminant emissions from all other stationary, area, on-road, and off-road sources were calculated using chemical speciation profiles applied to Total Suspended Particulate matter (TSP) and Total Organic Gas (TOG) emissions. Details on the chemical speciation profiles are described in the Source Attribution Methodology report[4].

In total, 21 toxic air contaminants were analyzed and included in this report. This list of toxic air contaminants is consistent with the list of toxic air contaminants that facilities are required to report under the South Coast AQMD Annual Emissions Reporting (AER) and AB2588 Air Toxics Hot Spots programs, except chlorofluorocarbons and ammonia. Chlorofluorocarbons are not considered to have toxic effects on human health, whereas ammonia is included in the criteria air pollutant inventory due to its importance as a PM precursor.

1-110 **Commented [35]:** This is a highly limited dataset, which includes only large facilities and emitters. Based on AQMD's own facility permitting data, we know there are dozens of smaller facilities (e.g. auto body shops, electroplating facilities) and several larger facilities (e.g. metal recycling facilities) which are not required to report emissions to AQMD. This lack of data, and the significant limitations of using only AER data to estimate air toxic levels, needs to be highlighted in this section.

Commented [36R35]: Add maps of these facilities. Add maps in general. It would be helpful to know where AQMD estimates emissions are coming from/concentrated, compared to community concerns & permitting data. It would also be useful to compare those maps now to maps produced at the conclusion of AB617 emissions reductions activities, to show whether/how emissions were reduced

1-111 **Commented [37]:** what is this? further explain it in with accessible language

1-112 **Commented [38]:** if you are citing programs/ legislation then further explain them, think of your audience - community member wont know what this is - make this CERP as accessible as possible

1-113 **Commented [39]:** why is this important?

[4] Methodology for Source Attribution Analyses for the first year AB 617 Communities in the South Coast Air Basin. Available at: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/source-attribution-methodology.pdf

The contribution from major emission categories to toxic air contaminant emissions in the SLA community are presented in **Figure 3b-4**. Note that the emissions in the figure are weighted based on the inhalation toxicity of each toxic air contaminant relative to diesel PM (DPM), following the methodology described in the Source Attribution Methodology report.[4]

1-114

Commented [40]: what is this report that you keep referring to, seems important but i dont understand it

Commented [41]: I really dont understand this

For example, the cancer potency of hexavalent chromium is approximately 464 times higher than the cancer potency of DPM per unit of mass. Thus, hexavalent chromium emissions are multiplied by 464 to estimate the cancer potency-weighted emissions of hexavalent chromium. The units in the toxicity-weighted DPM-equivalent emissions are expressed in pounds per day (lbs/day). This weighting approach enables a comparison of the contribution of each toxic air contaminant to overall toxicity using a consistent scale.

1-115

Commented [42]: make this a graph - and explain what Hexavalent chromium is - if you are introducing new terms into the CERP then always explain them

1-116

Commented [43]: is this important for the CERP? lets avoid such technical details - how can you summarize this in community accessible language, if you cant, then is not needed

Figure 3b-4 indicates that DPM is the largest contributor to the overall air toxics cancer risk in the community, followed by 1,3-butadiene, benzene, formaldehyde and hexavalent chromium.

Figure 3b-4 also indicates the major source categories from which the five toxic air contaminants originate.

Most of the DPM is emitted from mobile sources (on-road and off-road vehicles). Also, mobile sources are the major contributor to all the other major toxic air contaminants: 1,3 butadiene, benzene, formaldehyde and hexavalent chromium.

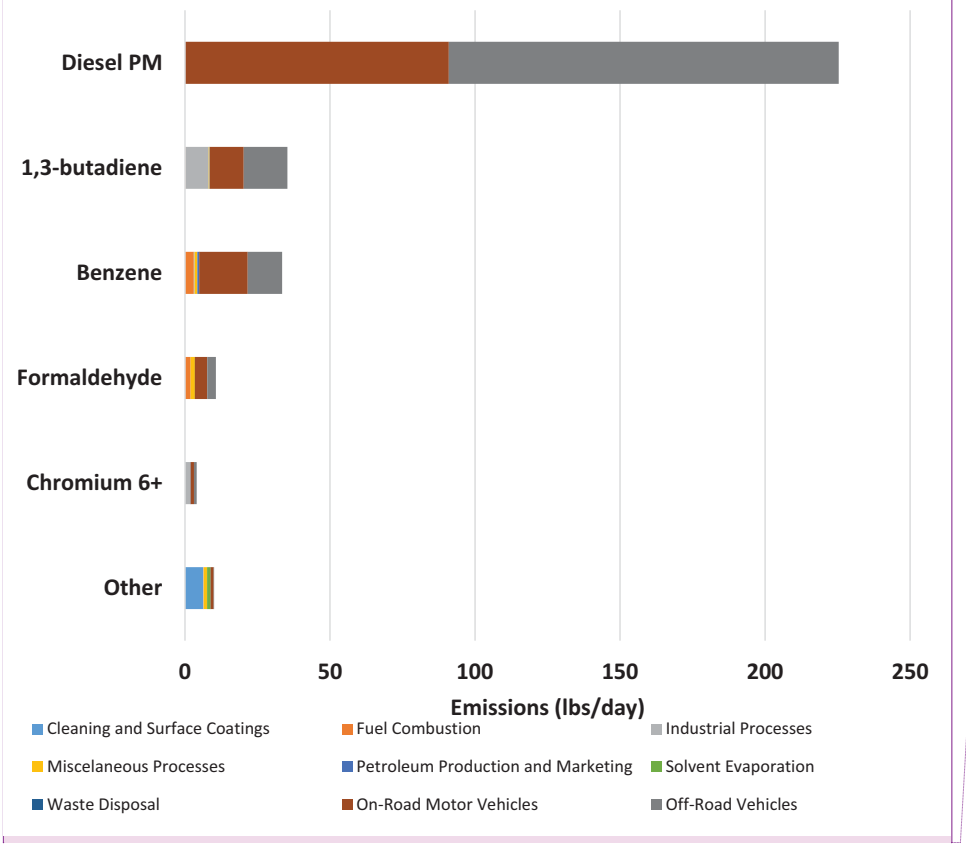
Plastic production in the chemical industry is another major contributor to 1,3-butadiene, whereas fuel combustion in industrial, commercial, and residential sectors contribute to benzene and formaldehyde emissions.

Industrial activities related to laundering, degreasing and coatings contribute to emissions of methylene chloride, perchloroethylene and cadmium, represented in the 'Other' category in **Figure 3b-4**. A detailed emission inventory by major source category is provided in the Appendix 3b: Source Attribution Analysis.

1-117

Commented [44]: broken down parragraphs

Figure 3b-4: South Los Angeles Community Toxic Air Contaminants Emissions (toxicity-weighted diesel equivalent) in 2019



1-118 **Commented [45]:** Fix chart

Future Year Emissions Inventory and Source Attribution

Future emissions of criteria pollutants and toxic air contaminants in the SLA community are projected using the best available information for population growth, economic growth and emission adjustments that reflect the ongoing implementation of existing regulations. The estimates shown here do not reflect the potential impact of any new programs or measures not yet approved, and/or included in the CERP for SLA. The community includes a variety of facilities subject to rules targeting toxic emissions. Furthermore, on-road DPM emissions from heavy-duty diesel vehicles in this community are subject to California Air Resources Board's Truck and Bus Regulation.[5] Off-road diesel equipment is also subject to state regulations that will reduce DPM and NOx emissions and the South Coast AQMD has also developed and implemented various regulations and programs to reduce NOx and VOC emissions from stationary and mobile sources. A detailed emission inventory by major source category for future years is provided in the Appendix 3b.

Figure 3b-5 presents the projected trend in major criteria air pollutant emissions (NOx, VOC and PM2.5) in the SLA community from 2019 to the two milestone years, 2026 and 2031. NOx emissions in the community are expected to decrease substantially between 2019 and 2031, due to the existing regulations and programs for mobile and stationary sources. The emission reduction commitments under the South Coast AQMD RECLAIM program that covers the largest stationary NOx sources are expected to bring a significant amount of NOx reductions as well. VOC emissions are also expected to decrease between the years 2019 and 2031, mostly due to cleaner vehicle emissions. Unlike NOx and VOC emissions, PM2.5 emissions remain virtually unchanged during the period from 2019 to 2031, reflecting that growth in population and economic activities offsets the reductions in on-road and off-road mobile sources due to regulations.

Trends for toxic air contaminant emissions are shown in **Figure 3b-6**.

- Diesel PM continues to dominate the toxic air contaminants emission inventory in future years, despite a significant reduction in DPM from heavy-duty trucks.
- DPM is expected to decrease by 61% from 2019 through 2031.
- The second largest contributor to air toxics is 1,3-butadiene, with emissions anticipated to decrease due to reductions from vehicles.
- Benzene and formaldehyde emissions are also expected to decrease throughout the 12-year period due to overall emission reductions from vehicles
- Hexavalent chromium emissions decreases from 2019 to 2031 are expected due to a decrease in vehicle emissions that is partially offset by a slight increase in industrial emissions.
- Emissions of perchloroethylene, methylene chloride and cadmium are not expected to change much.

It is important to note that many of the South Coast AQMD regulations addressing toxic metal emissions from industrial facilities (e.g., South Coast AQMD Rule 1407.1 and Rule 1469) include

[5] CARB Truck and Bus Regulation, https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about

1-119 **Commented [46]:** is this referring to future emissions without the CERP?

1-120 **Commented [47]:** what is this, what does it do, how does it work?

Commented [48R47]: redflag - this program is failing for the south coast it operates similarly to cap and trade and turns into potentially more emissions, is an industry hand out, and does little to address local impacts and improve air quality.

Commented [49]: how?

1-121 **Commented [50]:** so no projected reductions? make it more clear and less fluff

1-122 **Commented [51]:** explain why

1-123 **Commented [52]:** fewer vehicles? new technology?

1-124 **Commented [53]:** new tech?

1-125 **Commented [54]:** where does this estimate come from?

1-126 **Commented [55]:** these rules need to be summarized or defined

requirements to reduce fugitive metal toxic particulate emissions from these facilities. Fugitive metal particulate emissions can make up the majority of the toxic metal emissions from a metal processing facility but are often difficult to quantify due to a lack of accepted emission estimation methods. Therefore, while the inventories shown here may not illustrate an overall decrease in toxic metal emissions, the regulations are expected to result in overall decreased emissions due to reductions in fugitive emissions. The analysis presented in this section is a regional analysis evaluating total toxic air contaminant emissions. This analysis is different than a localized health risk assessment which takes into account specific parameters about the emission sources within a facility and the proximity and types of receptors around the facility.

1-127

Commented [56]: which facilities?

Commented [57]: Does this paragraph need a new header for fugitive emissions?

Figure 3b-5: Community Total Emission Trends for NOx, VOC, and PM2.5 (tons/day) for the Year of 2019, 2026, and 2031

1-128

Commented [58]: could be more visually appealing with the numerical data listed in the graph. For example have the number 15 in the 2019 blue section - this could be done for all of the graphs

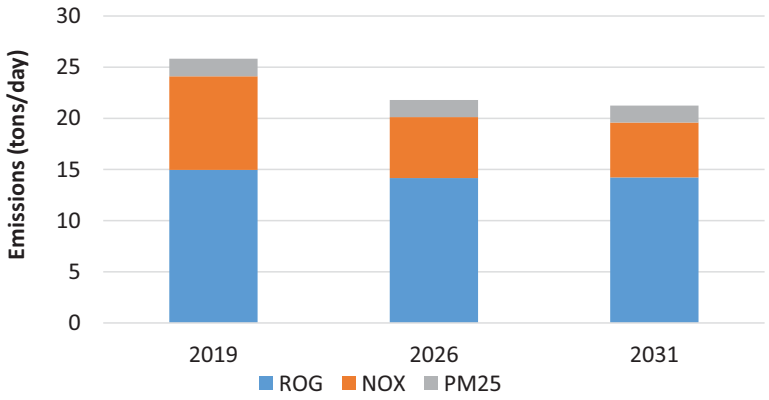


Figure 3b-6: Total Emission Trends for Toxic Air Contaminants in SLA (Cancer Potency-Weighted Diesel-Equivalent Emissions, lbs/day) for the Year of 2019, 2026, and 2031

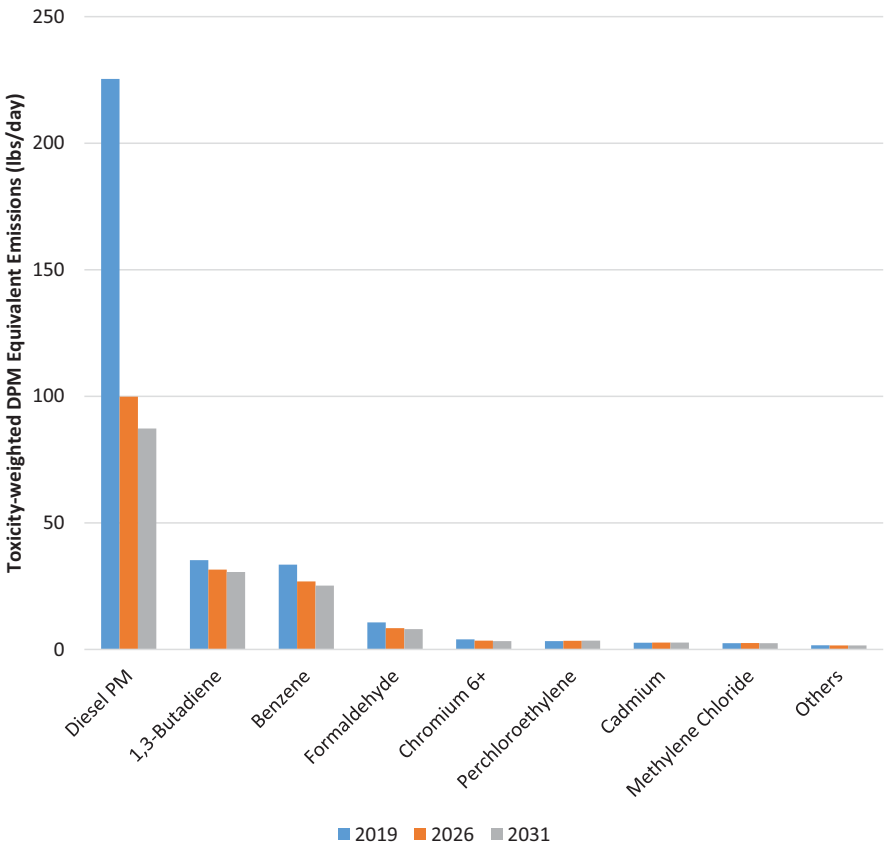
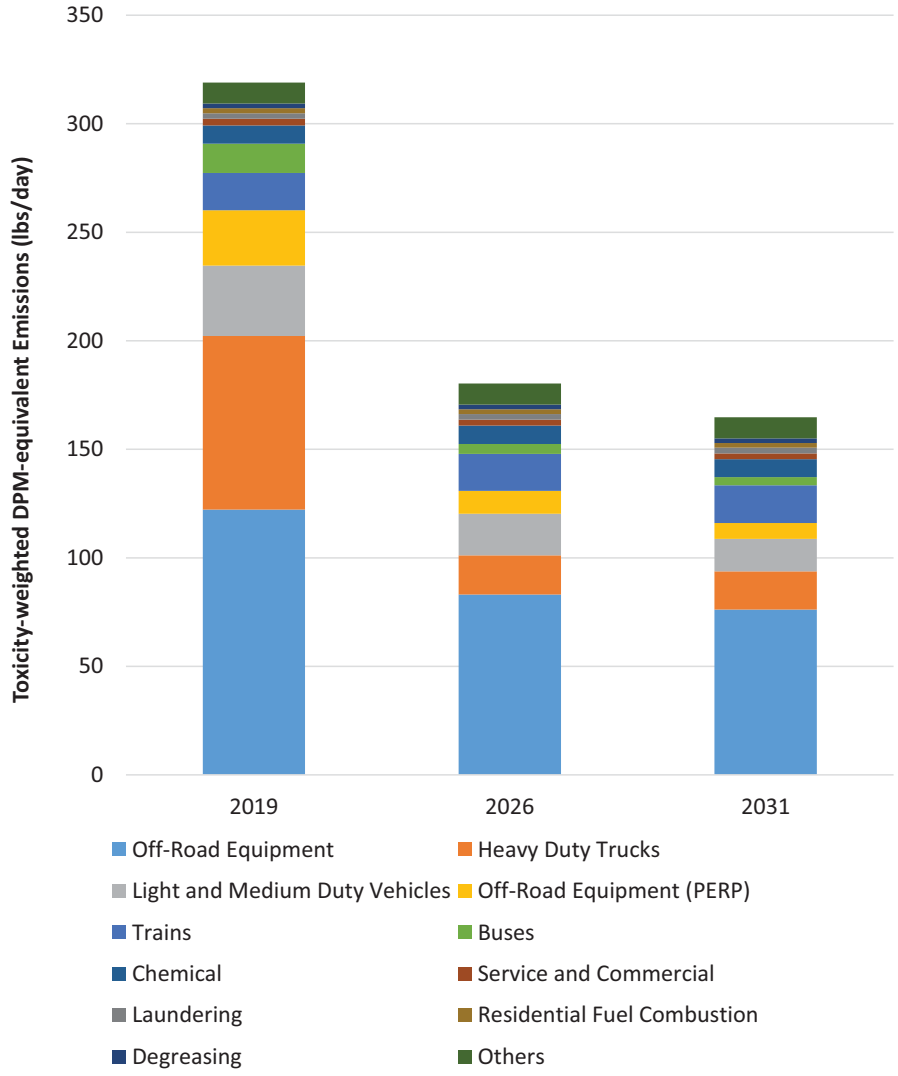


Figure 3b-7 presents the total toxic air contaminant emissions by the major emission categories for the three years of interest. The overall toxicity-weighted emissions decrease between 2019 and 2031. In particular, emissions from diesel heavy-duty trucks and off-road equipment are expected to decrease substantially over the 12-year period, reducing the overall toxic air contaminant emissions. While emissions of toxic air contaminants from mobile sources are expected to decrease over time, emissions from stationary sources in large facilities can still affect the nearby population, if these emissions are not remediated.

1-129

Figure 3b-7: Toxic Air Contaminant Emissions from All Sources in the SLA Community, Shown by Major Categories

1-130 **Commented [59]:** This is just not true, given AER includes only large facilities



Summary

The main sources of air pollutant emissions in the SLA community are on-road vehicles, trains, off-road equipment, and industrial activities.

1-131 **Commented [60]:** this should be stated in the introduction somewhere

NO_X emissions in this community are dominated by mobile sources – both on-road and off-road – which account for 79% of the total emissions in 2019. Heavy-duty truck traffic and off-road equipment are the largest sources for NOx. Stationary sources contribute to 21% of NOx emissions in this community, mostly from fuel combustion in the residential, commercial, and industrial sectors.

VOC emissions are dominated by area sources, with consumer products such as evaporation from solvents and cleaning supplies being the largest source. Passenger vehicles and off-road equipment such as lawn mowers and other small gasoline engines, are the largest contributors to VOC emissions from on-road and off-road sources, respectively.

Unlike NOx and VOC, sources of PM2.5 emissions span through a wide variety of activity sectors, which include commercial cooking, light- and medium-duty automobiles, fuel combustion, paved road dust, and wood and paper industries.

Toxic air contaminant emissions in the SLA community are dominated by diesel particulate matter (DPM). Major sources of DPM in this community are off-road equipment, heavy-duty trucks, trains, and buses. 1,3 butadiene is the second largest toxic air contaminant based on cancer potency-weighted emissions, and the major sources are gasoline combustion in on-road and off-road vehicles and plastic production. Other significant toxic air contaminant species includes benzene and formaldehyde, which are mostly emitted from mobile sources. Hexavalent Chromium, which is mostly emitted from metal processing facilities, is identified to have the fifth highest contribution to the community's total cancer-potency weighted toxic air contaminant emissions.

1-132 **Commented [61]:** would like a map to illustrate where

1-133 **Commented [62]:** again, map these data

1. Future NOx emissions in the community are expected to decrease due to the existing regulations and programs on mobile and stationary sources.
2. VOC emissions are also expected to decline, although they will decline at a slower rate compared to NOx.
3. The increase in the VOC emissions is driven by the growth in consumer products and small off-road equipment, both of which are tied with population growth. In particular, emissions in consumer products are expected to increase significantly.
4. On the other side, most NOx emissions are from on-road and off-road mobile sources, which have regulations in place to reduce emissions in future years.
5. Emissions of DPM from heavy-duty trucks are also expected to decrease due to ongoing implementation of regulations (e.g., Truck and Bus regulation, In-Use Off-Road Diesel-Fueled Fleets regulation) and incentive programs to expedite turning over to cleaner trucks.
6. Emissions of 1,3-butadiene, benzene, formaldehyde, and hexavalent chromium are also expected to decrease due to overall reductions of vehicle emissions.
7. Despite the projected reductions in DPM over the next decade, DPM continues to be the main contributor to air toxics cancer risk in this community.

1-134 **Commented [63]:** We need real projections on how much these pollutants will decrease

1-135 # Chapter 4: Enforcement Overview and History

1-136 ## Introduction

This chapter describes the enforcement history and overall approach to enforcement by South Coast Air Quality Management District (South Coast AQMD) and California Air Resources Board (CARB). In addition, the Community Emissions Reduction Plan (CERP) includes focused enforcement actions, which are described in Chapter 5: Actions to Reduce Community Air Pollution. Both CARB and South Coast AQMD regulate and enforce air pollution laws and have the authority to conduct inspections of air pollution sources, and issue violations that can lead to penalties.[1]

Chapter 4 Highlights

From 2018 through 2021, in the South Los Angeles (SLA) area, CARB conducted over 300 inspections and addressed approximately 60 complaints; and South Coast AQMD conducted approximately 765 inspections and responded to approximately 3,034 complaints.

Both CARB and South Coast AQMD have designed their programs to most effectively address sources within their respective jurisdictions.

The enforcement approach for SLA utilizes specialized program structures, outreach efforts in the community, use of technology, and interagency partnerships which can lead to increased compliance and further emission reductions.

An air pollution source can be a specific piece of equipment or a process, a business, a government agency, or any other entity that creates air pollution. CARB is primarily responsible for enforcement of trucks, buses, and other mobile sources, while South Coast AQMD is primarily responsible for enforcement relating to stationary sources (e.g., facilities).[2] Additionally, South Coast AQMD has jurisdiction over indirect sources, which are fixed locations that attract mobile sources such as a shopping center, warehouse, or port.

1-137

1-138 New header: Enforcement goals and background

Include the following:

1-139
- Enforcement background
  - Permitted Sources
  - Inspections
  - Compliance
    - NOC/NOVs

[1] More information about penalties will be provided in the Enforcement Appendix 4.

[2] In some cases, CARB may have agreements that give local air districts delegated authority to enforce a particular CARB rule. For example, South Coast AQMD has an agreement with CARB to be able to enforce CARB's greenhouse gas standards.

Commented [1]: overall feedback: missing inspections rate and how it leads to enforcement, how the process of inspections to enforcement work, more information on NOC/NOVs vs complaints and inspections is needed to better understand the state of enforcement in SLA

Commented [2]: I understand the numbers in bullet 1 are important, but I feel like these don't really say much - like what do these numbers mean is that good in terms of inspections, what are we aiming for in terms of inspections in a year and if there were 300 inspections how many of those led to enforcement, how many NOC/NOVs would be a better highlight. and I also don't know what "responding" to 3k+ complaints mean, what are those complaints and what are those responses. Again the numbers don't say much.
Also, the second bullet does not say anything to me that is worth highlighting.

Commented [3]: A chart may be easier to read - to show different authorities/enforcement application

Commented [4]: I think it could be beneficial to have a section discussing the overall goal of the enforcement program the history of both CARB and AQMD's history of enforcement so community members can distinguish between what CARB does and what AQMD does, before jumping into the "complaints" section - Giovanna

1-140

- SCAQMD vs CARB enforcement programs
- Mobile Sources Enforcement
- Stationary Sources

Table 4-1: South Coast AQMD Summary of Compliance Activities by Community Concern from 2018 through 2021[3]

1-141

Community Concern	# of Facilities	# of Inspections[4]	# of Complaints[5]	# of Notices of Violation (NOVs)	# of Notices to Comply (NCs)
Oil and Gas	19	41	80	13	11
Mobile Sources (Truck Idling)	N/A	0	17	0	0
General Industrial[6]	353	413	50	153	168
Auto Body Shops	89	57	8	12	68
Metals	69	197	3	26	65

South Coast AQMD enforces CARB's truck idling rule. **Table 4-1** describes South Coast AQMD's compliance activities in SLA. For mobile sources, the focus of South Coast AQMD's efforts within SLA has been to respond to idling complaints. While South Coast AQMD has not received a significant number of idling truck complaints in SLA, there were 17 complaints received between 2018 through 2021. While compliance with the idling rules tends to be high, all South Coast AQMD AB 617 Community Steering Committees (CSCs) consistently identify idling trucks as a source of air pollution concern within their community. Therefore, South Coast AQMD is committed to increasing enforcement efforts on idling trucks within these communities. In order to identify idling locations of concern, the CSC can help by sharing those locations with South Coast AQMD via telephone at 1-800-CUT-SMOG and by helping both South Coast AQMD and CARB with community outreach about CARB's idling rules.

1-142

1-143

Complaints

Air pollution concerns received directly from community members by way of public complaints are a very important source of information for South Coast AQMD. All complaints are assigned to an inspector for investigation, with priority for ongoing issues that are impacting the public.

[3] For the purposes of this chapter, the timeframe of "2018 through 2021" includes January 1, 2018, through December 31, 2021.

[4] These include staff-initiated inspections and surveillance, but not responses to facility notifications or complaints.

[5] Complaints where the source was confirmed to be a community concern.

[6] Includes inspections at Chemical, Dry Cleaners, Gas Stations, Manufacturing, Other Industrial, and Utility facilities.

Commented [5]: explain each of these further before jumping into compliance activities

Commented [6]: can this table be further explained? like what do these numbers mean. if there are 80 complaint for oil and gas and only 11 NOC's and NOVs then what is happening to enforcement? and only 41 inspections for the entire spam of 3 years, that is a real low inspections percentage for an industry as big as oil and gas, so what does this mean - a low inspections rate ?

Commented [7]: can this table be further explained? like what do these numbers mean. if there are 80 complaint for oil and gas and only 11 NOC's and NOVs then what is happening to enforcement? and only 41 inspections for the entire spam of 3 years, that is a real low inspections percentage for an industry as big as oil and gas, so what does this mean - a low inspections rate ?

Commented [8]: can this table be further explained? like what do these numbers mean. if there are 80 complaint for oil and gas and only 11 NOC's and NOVs then what is happening to enforcement? and only 41 inspections for the entire spam of 3 years, that is a real low inspections percentage for an industry as big as oil and gas, so what does this mean - a low inspections rate ?

Commented [9]: can this table be further explained? like what do these numbers mean. if there are 80 complaint for oil and gas and only 11 NOC's and NOVs then what is happening to enforcement? and only 41 inspections for the entire spam of 3 years, that is a real low inspections percentage for an industry as big as oil and gas, so what does this mean - a low inspections rate ?

Commented [10]: can this table be further explained? like what do these numbers mean. if there are 80 complaint for oil and gas and only 11 NOC's and NOVs then what is happening to enforcement? and only 41 inspections for the entire spam of 3 years, that is a real low inspections percentage for an industry as big as oil and gas, so what does this mean - a low inspections rate ?

Commented [11]: this is not enough, and places the burden on the community to get this complaints out so enforcement can happen. Perhaps yes community outreach combined with more regular inspections and incentives for retrofit technologies for fleet and school buses.

Commented [12]: I think this needs to be renamed. Maybe community feedback or something. It has a negative connotation with just calling it "complaints"

Commented [13R12]: They are called public complaints, so its okay if they have a negative connotation

Table 4-2 provides a summary of the complaints received within SLA and the surrounding community.

Table 4-2: Summary of Complaints Received within SLA and the Surrounding Community[7] from 2018 through 2021

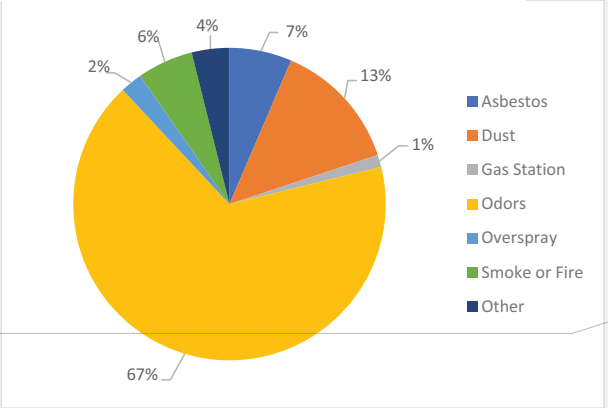
1-144

Complaint Type	Number	Notice of Violation Issued	Notice to Comply Issued	Referred to Another Agency	No Enforcement Action Taken[8]
Asbestos	229	7	49	4	169
Dust	477	28	32	5	412
Gas Station	45	0	2	7	36
Odors	2369	284	27	12	2046
Overspray	81	1	6	4	70
Smoke or Fire	205	15	4	1	185
Other	138	9	6	7	116
Total	3544	344	126	40	3034

1-145

1-146

The most common type of complaints, as **Figure 4-1** indicates, are odor complaints. Due to the fleeting nature of odors, inspectors may not always be able to verify an odor or detect a source; and while this can be a frustration for community members, staff urges members of the community to call in a complaint on each occurrence. This strengthens the investigation and increases the likelihood that a source will ultimately be identified.



Commented [14]: maybe "amount" instead of "number"

Commented [15]: can this table be further explained? seems like its a high amount of complaints compared to number of NOC/NOVs - I wonder also how does this stand when compared to inspections - meaning how many inspections are conducted compared to complaints, to see if communities are being heard.

Commented [16]: seems like this is very oversimplified here, is not just that community members are frustrated, is that the systems of complaints is not working if enforcement is not happening . see table above - there are so many complaints compared to the number of enforcement actions.

Commented [17]: not sure that this is true, see above table.

[7] The complaint information is based on the following Zip Codes: 90003, 90037, 90059, 90061, 90062, 90222, 90011, 90262, 90007, 90008, 90018, 90089, 90044, 90016, 90305, 90047, 90221, 90002, 90043, 90220, 90015, 90001, 90248, 90056, 90021, 90303, 90247, 90230, and 90058.

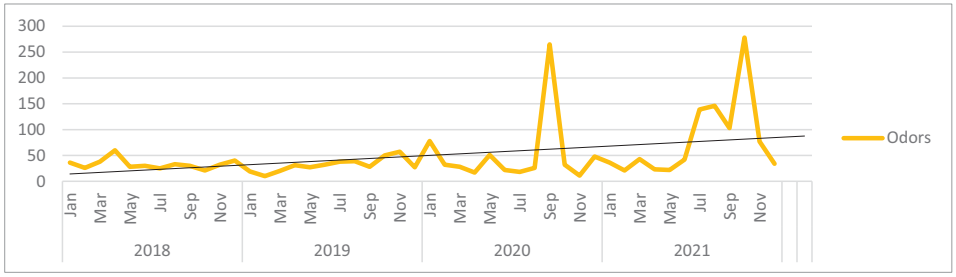
[8] "No Enforcement Action Taken" means that the complaint investigation has concluded but did not result in the issuance of a Notice of Violation or other formal enforcement action. For example, an alleged air pollution source may have been operating in compliance at the time of the inspection or the event underlying the complaint was no longer occurring.

Odor complaints have trended upwards over the years, potentially due to increased outreach efforts by South Coast AQMD and increased awareness by community members. However, as **Figure 4-2** indicates, complaint totals are often impacted by large odor events such as the spill of mercaptan (an odorant used for natural gas) that took place in Gardena in September 2020[9] and the Dominguez Channel Odor Event in October 2021.[10]

1-147

Commented [18]: does this mean that large odors events are making community members complain more? if that is the case, then just say that more clearly

Figure 4-2: Odor Complaints by Month within SLA



An important part of AB 617 is increasing community awareness of the tools that are available. Reporting complaints to both South Coast AQMD and CARB enables members of the public to play an active role in addressing air pollution concerns in their community. Both agencies rely on community input for identifying additional locations and sources of concern. Listed below are the best ways to contact South Coast AQMD and CARB:

1-148

Commented [19]: I think this needs to be more SLA centered, we have heard from CSC members - like Hugo Garcia - the frustrations community faces with reporting complaints, so I feel like this needs to be more transparent, nuisance, and reflective of what the CSC members have expressed

CARB
Mobile Sources & Idling Trucks

Online:
About the Environmental Complaint System

By Phone:
1(800)-END-SMOG
(1-800-363-7664)

South Coast AQMD
Facilities & Idling Trucks

Online:
File an Online Complaint

By Phone:
1(800)-CUT-SMOG
(1-800-288-7664)

[9] For more information regarding South Coast AQMD's investigation, please visit https://www.aqmd.gov/docs/default-source/news-archive/2020/NOVs-for-chemical-spill-compton-sept11-2020.pdf.

[10] For more information regarding the South Coast AQMD's investigation, please visit http://www.aqmd.gov/docs/default-source/news-archive/2021/5novs-for-elevated-hydrogen-sulfide-levels-dec3-2021.pdf.

When reporting air pollution complaints, it helps when you can share the Four W's:

What	Where	When	Who
What are you reporting? Odor, smoke, burning, idling truck?	Where did it occur? As specific of a location as possible	When did it occur? Date/time, and is it ongoing?	Who caused it, if you know?

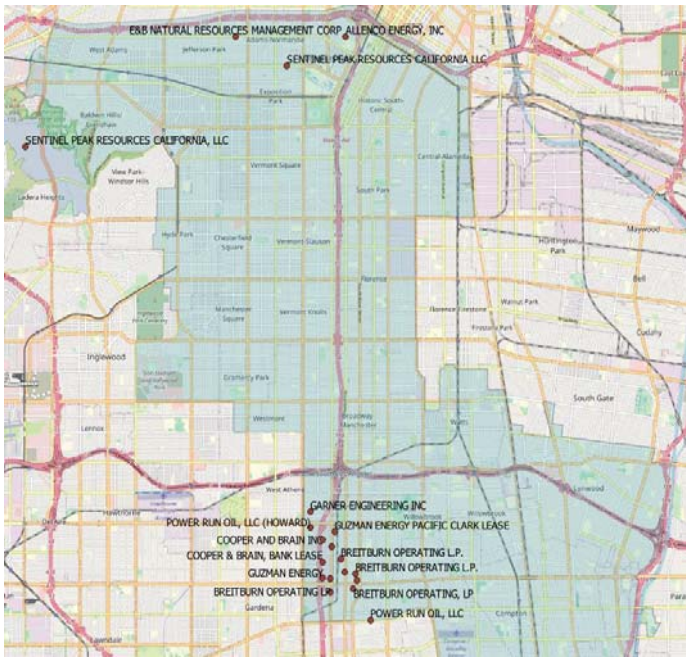
Typically, videos and photos cannot be the basis for South Coast AQMD and CARB to take enforcement action, but they can be helpful to the investigation. Of course, please always make sure that you are being safe.

- Oil and Gas Industry

1-149 Oil and gas facilities extract crude oil from underground and may also store the oil on-site. These facilities generally have permits for oil extraction, storage tanks, and wastewater equipment.

Commented [20]: add pictures of this

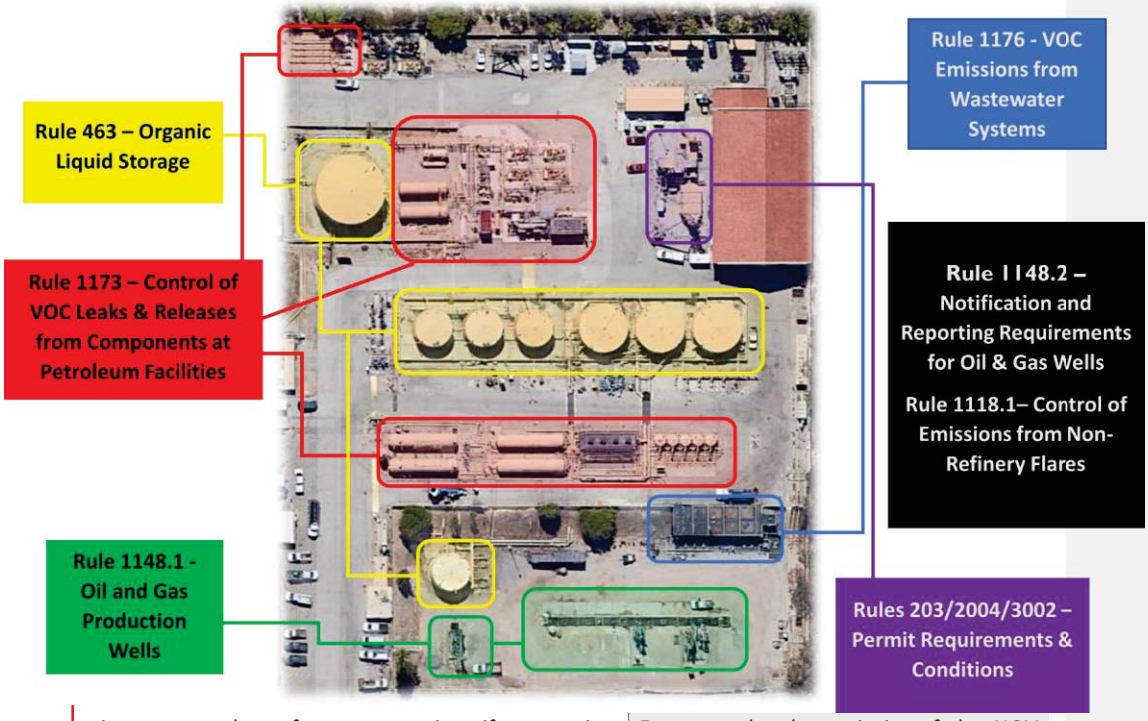
Figure 4-3: Map of Oil and Gas Facilities with Active South Coast AQMD Permits



Oil wells are inspected by South Coast AQMD's Energy Team. The Energy Team enforces the applicable regulations (**Figure 4-4**) using specialized equipment such as Optical Gas Imaging

cameras, T[illegible] these sites focus on i[illegible] detected

Figure 4-4: Rules Applicable to Oil and Gas Sites



1-150 inspectors take enforcement action, if appropriate. For example, the majority of the NOVs referred to in **Table 4-1** were issued for violations of the emissions standards set forth in Rule 1173. Please see **Figure 4-3** and **Figure 4-4** for locations of these facilities and the South Coast AQMD rules that apply to them. While the majority of South Coast AQMD's authority at these facilities is focused on criteria pollutants and toxics, the agency also actively enforces CARB's methane regulations.

Commented [21]: make this stand out more -it gets lost in the paragraph

○ General Industrial

General Industrial is a broad category which covers community concerns that do not fit neatly into other categories identified by the CSC. **Figure 4-5** and **Figure 4-6** provide an overview of facilities within this air quality priority. General Industrial facilities have permitted equipment based on the particular process(es) at issue, such as storage tanks, baghouses, boilers, and heaters.

1-151

Commented [22]: add pictures of these

Generally, inspections of these facilities would be conducted by South Coast AQMD's Industrial, Commercial, and Government Operations Team; however, specialized teams may conduct inspections for certain sources, such as gas stations.

Figure 4-5: Breakdown of Number of General Industrial Facilities with SLA

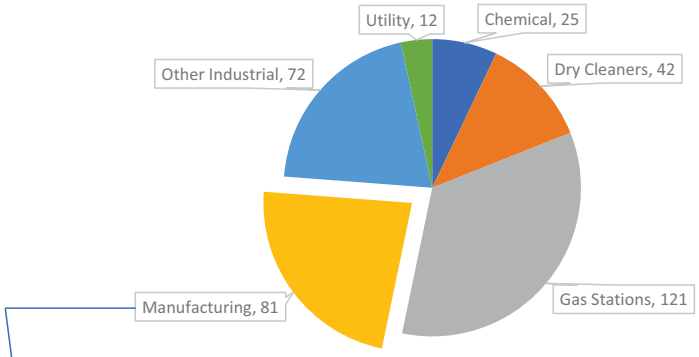
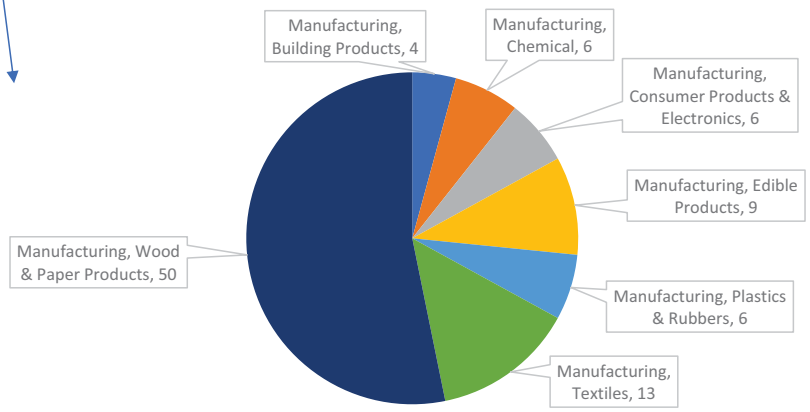


Figure 4-6: Breakdown of General Industrial Manufacturing Category within SLA

1-152



Commented [23]: can this be a bar graph/or a map or another visual representation?

Since this category can contain a variety of facility types, CSC input provided on this topic will be crucial in prioritizing South Coast AQMD inspections. The numbers and rules cited for NOVs within this category vary widely and may not be indicative that a particular industry is "better" or "worse" than another, since the rules and permit conditions that apply may be different. Therefore, the CSC input on this topic will give community level insight to focus enforcement efforts within this category.

Metals

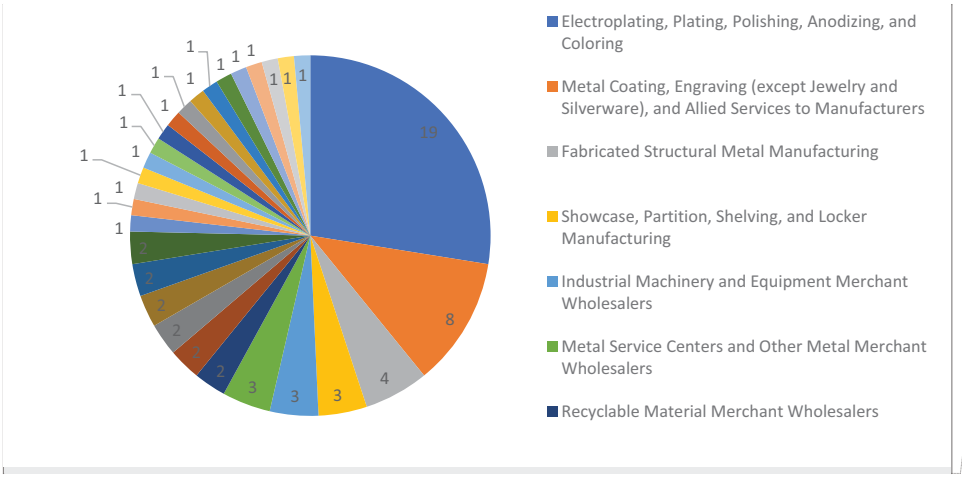
Metal facilities are those which work with or process metals. They can have permits for plating, coating, melting, or other metal working processes (**Figure 4-7**).

Figure 4-7: Pouring Molten Metal into Molds

These facilities are mainly inspected by two South Coast AQMD teams, depending on the source type: Industrial, Commercial, and Government Operations and Toxics and Waste Management.

Figure 4-8 showcases the current distribution of metal processing facility types within the community. This distribution helps to inform the CSC on the sources within their community and enables the CSC to prioritize efforts towards those sources which are of greatest concern to them and to other members of the community.

Figure 4-8: Distribution of Metals Facility Types within SLA[11]



1-153

When considering priorities, it is important to consider that South Coast AQMD prioritizes inspections using various criteria, including the type of pollutants potentially emitted by a facility. For example, chrome plating facilities are generally inspected once per quarter, due to the higher risk that emissions of hexavalent chromium can pose. The full list of facilities and their categories will be listed in Appendix 4.

1-154

Auto Body Shops

Auto Body Shops are facilities that conduct automotive repair and refinishing (**Figure 4-9**). These facilities are inspected by South Coast AQMD's Industrial, Commercial, and Governmental Operations team.

Within the SLA community boundary, South Coast AQMD identified approximately 90 facilities with permitted automotive-type paint spray booths, 60 percent of which were inspected within the last five years.

1-155

As to the violations cited in **Table 4-1**, the majority of violations issued to auto body shops are for:

[11] A full breakdown of other categories not listed in this figure will be provided in Appendix 4.

Commented [24]: not a user/audience friendly chart - can this be visualized differently? a bar graph/ a map?

Commented [25]: make this stand out more

Commented [26]: these facts should stand out more on their own

Commented [27]: 60% inspected in the last five years, so how many inspections per year?

1-156

- (1) operating a paint spray booth without a valid permit and
- (2) storing or using non compliant coatings or solvents on-site.

Commented [28]: use bullet points and page breaks, not everything needs to be in a paragraph

These facilities use VOC-containing paints and solvents, and their permit conditions generally set a limit on usage of these materials. However, concerns from members of the community are often focused on odors which are not directly addressed by South Coast AQMD rules and permit conditions for these facilities. The primary regulatory approach to take enforcement action on odors from an auto body shop is through Rule 402.[12] Therefore, receiving complaints from community members about particular auto body shops causing odor issues is crucial in addressing these concerns.

1-157

1-158

Commented [29]: explain this rule

Commented [30R29]: not just as a footnote

Commented [31]: I don't understand this, it says odors complaints are not addressed by SCAQMD rules, but then it says that odor complaints from community members ae encouraged?

Mobile Sources

CARB is primarily responsible for enforcement of air quality regulations relating to trucks, buses, and other mobile sources, while South Coast AQMD is primarily responsible for enforcement relating to stationary sources (e.g., facilities). Therefore, the focus of South Coast AQMD's efforts around mobile sources within SLA has been to enforce CARB's truck idling regulation and respond to idling complaints.

Figure 4-10: Distribution of Complaints by CSC Identified Concern within SLA

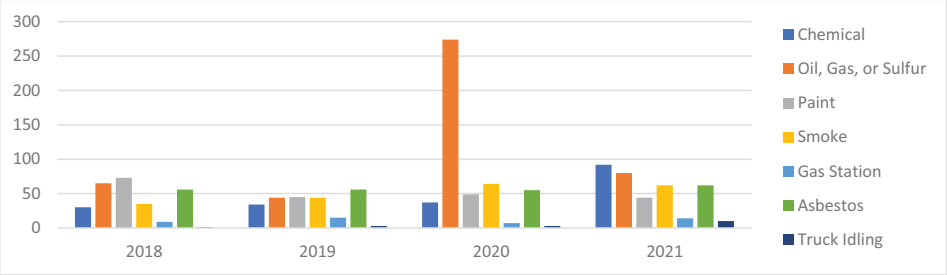


Figure 4-10 above, shows the number of complaints received from 2018 through 2021; the complaints are categorized by complaint type which were CSC-identified areas of concern. Further, as **Figure 4-10** shows above, while South Coast AQMD has not received a significant number of idling truck complaints, the CSC has identified idling trucks as a significant source of air pollution within their community. Therefore, South Coast AQMD is committed to increasing enforcement efforts on idling trucks within the community, which involves enforcing CARB's

[12] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf

diesel truck idling regulation.[13] This effort will require CSC input on locations with idling concerns as well as outreach to the community via South Coast AQMD's complaint response program.

o CARB Enforcement Activity in South Los Angeles

CARB has authority to reduce emissions of air pollutants ranging from criteria air pollutants, like smog-forming oxides of nitrogen (NOx) and VOCs, to toxic air contaminants, like diesel particulate matter and greenhouse gases (e.g., methane). CARB is charged with enforcing its regulations applicable to mobile sources, consumer products, and other area-wide categories, fuels, and climate programs. CARB is also charged with overseeing the implementation of local air district permit and enforcement programs implementing requirements that apply to stationary industrial pollutant sources. In addition, CARB has direct enforcement authority over climate programs, many of which impact stationary sources directly or indirectly.

Diesel Vehicle Enforcement

CARB regulations establish stringent emission requirements that new diesel vehicles must meet. These requirements include installation of diesel particulate filters which remove more than 98 percent of toxic diesel particulate matter when properly functioning; and 90 percent of smog forming NOx. In addition, because diesel engines and heavy-duty vehicles and equipment are designed to last decades, CARB's diesel fleet regulations require operators to replace older, higher polluting vehicles and equipment with lower pollutant vehicles, equipment, and technologies to provide emission reductions as quickly as possible. These regulations apply to operators of on-road diesel vehicles such as trucks, and off-road diesel vehicles and equipment including construction and cargo handling equipment, commercial harbor craft, and other sources. As a result of these programs, CARB has greatly reduced diesel particulate and NOx emissions by over 90 percent in communities statewide.

Through its interaction with community members, CARB has heard the concerns of the community regarding diesel powered vehicles and equipment.

Areas of concern CARB heard were:

- issues with heavy-duty diesel vehicle idling,
- the operation of trucks in and around warehouses,
- compliance with state heavy-duty diesel vehicle regulations, and
- the operation of oil and gas extraction facilities in the community.

1-159

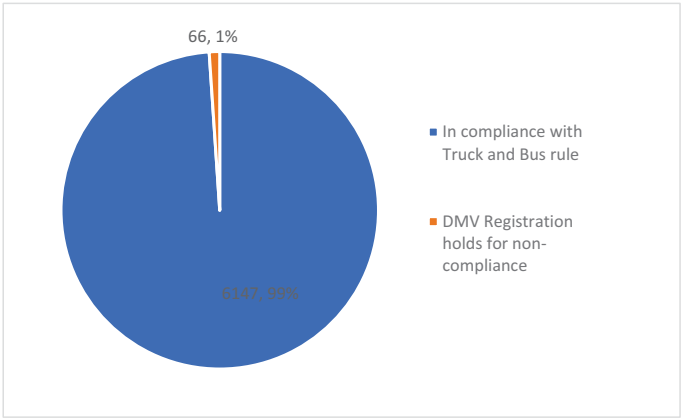
Commented [32]: use bullet points

[13] CARB's truck idling regulation expressly allows enforcement by local air quality regulators.

Figure 4-11: Programs CARB Enforces

In this section, CARB presents the history of enforcement activity related to the relevant enforcement programs in the SLA community from 2018 to 2021. See **Figure 4-11** for a breakdown of CARB's enforcement activities in SLA from 2018 – 2021. More details on general locations by year and by category within SLA's boundary can be found in CARB's Enforcement Data Visualization System (EDVS).[14]

Figure 4-12: Compliance with CARB's Truck and Bus Rule for Registered Trucks and Buses in SLA



Nearly all trucks and buses in California are already, or will be, required to have a certified 2010 or newer model year

[14] Since CARB cannot present personal information and these inspections are related to vehicles that are mobile, the best way to see the inspections and compliance status of vehicles traversing and servicing the SLA community is in CARB EDVS. Currently EDVS is updated annually. CARB intends to begin updating this quarterly beginning this year. A guide on how to use EDVS is here: https://ww2.arb.ca.gov/resources/fact-sheets/enforcement-data-visualization-system-fact-sheet

engines by the end of 2023 to comply with CARB's Truck and Bus rule to legally operate in California.[15] In fact, California is entering its third year where the California Department of Motor Vehicles (DMV) is holding registration for some trucks and buses that are not in compliance with CARB's Truck and Bus rule as a requirement of Senate Bill 1. Due to CARB regulation implementation and enforcement, the compliance rate statewide for the rule was 98 percent in 2020. **Figure 4-12** is based on California DMV registration data. In SLA it was 99 percent, meaning that of the 6,213 heavy-duty trucks and buses registered in SLA, 6,147 were in compliance with the Truck and Bus rule in 2020. The other 66 had registration holds placed on them, which meant they could not legally be driven in California.

[15] CARB, The Truckstop – Truck and Bus Regulation, https://ww2.arb.ca.gov/sites/default/files/truckstop/tb/truckbus.html

Table 4-3: CARB Inspections in SLA from 2018-2021 for Truck Idling, Off-Road Equipment, and Transportation Refrigeration Units (TRUs)

	Idling	Off-road Equipment	TRUs
2018			
Inspections	16	14	0
Non-compliant	6	4[16]	0
Compliance rate	63%	71%	-
2019			
Inspections	2	79	0
Non-compliant	1	16[16]	0
Compliance rate	50%	80%	-
2020			
Inspections	48	6	7
Non-compliant	2	4[16]	5
Compliance rate	96%	33%	29%
2021			
Inspections	90	0	2
Non-compliant/ Pending	3	1[16]	1
Compliance rate	97%	0%	50%
2018 – 2021 Total			
Inspections	156	100	9
Non-compliant/ Pending	12	25[16]	6
Compliance rate	92%	75%	33%

CARB's idling rules cover commercial vehicles, like trucks and buses, school buses, and off-road equipment. In general, there is a 5-minute idling limit statewide, but the rule allows vehicles and equipment to idle for longer periods under specified conditions, like when trucks are lined up waiting to get into a warehouse.

1-160 CARB conducted 156 idling inspections in SLA from 2018 – 2021. Twelve of those were out of compliance. The overall compliance rate of 92 percent is relatively high, but lower than the statewide average of 98 percent compliance. So more inspections and other strategies will be useful to help deter illegal idling in the community.

The off-road diesel regulation applies to many types of heavy-duty diesel vehicles that aren't typically driven on the road, but rather used in construction and at oil and gas facilities. Looking at off-road fleet compliance in SLA from 2018 – 2021, CARB inspected a total of 100 off-road

[16] These are non-emissions violations for lack of, or improper, labeling.

pieces of construction equipment. Twenty-five of these were out of compliance with the labeling requirement of the regulation, but were compliant with emission and technology requirements of the rule.

Transportation refrigeration units (TRUs) keep goods cooled (or heated) in cargo containers during transport and are regulated by CARB under the TRU regulation. CARB conducted nine of those inspections between 2018 and 2021 in SLA and found six violations, all of which were for labelling and not non-compliance with engine technology or emission requirements. CARB's TRU rule typically has lower compliance rates, and so identifying areas where TRUs operate in SLA, and conducting inspections to enhance compliance could reduce emissions in the community.

Oil and Gas

In addition to CARB's mobile source regulations, CARB also enforces rules related to the extraction, refinement, and distribution of fuels. The California Oil and Gas Regulation (COGR) that was adopted in 2017 is intended to reduce fugitive and vented methane emissions from new and existing oil and gas facilities. In addition, methane releases may be accompanied by emissions of other organic compounds that cause odor.

1-161 CARB did not conduct inspections at oilfields (active or idle wells) or drilling sites in SLA between 2018 – 2021, because CARB had a memorandum of understanding with the South Coast AQMD to conduct these inspections.

Commented [33]: should be a fact on its own

CARB is now starting to support the South Coast AQMD on enforcement of this regulation. However, based on input from the CSC, including what was learned on a tour of the Murphy Drill Site last year, CARB will develop a plan, in collaboration with the community and the South Coast AQMD to:

- inspect oil and gas facilities in SLA for compliance with local and state regulations,
- and determine if regulations might be strengthened to better protect the community.

During the inspections, CARB will look at all sources of pollution located at these facilities, including stationary, portable, and mobile. CARB uses inspection equipment like mobile monitoring, optical gas imaging cameras, toxic vapor analyzers, infrared optical gas detectors, and eagle gas monitors as well as drones.

1-162 CARB will document the results of the inspections and summarize what was learned in a report back to the community.

Commented [34]: how will this support the CERP implementation and will this be in alignment with the SLA CERO implementation?

Community Concerns

CARB receives and responds to concerns identified by the community. This process is very important because CARB is likely unaware of the concern that is affecting the community. In addition to the programs described in CARB's discussion above, CARB will act on all complaints it receives. CARB received 60 complaints in the SLA community between 2018 – 2020, about three-quarters of the complaints CARB received between 2018 and 2020 were for 46 smoking vehicles.

This means people saw a vehicle with smoke coming out of the exhaust pipe, and that the vehicle is likely in violation of CARB's smoke opacity rule.

Table 4-4: Complaints Received by CARB from SLA zip codes between 2018 and 2020[17]

Complaint Type (Program Type)	Number	Action Taken[18]
Idling (Idling)	2	1 enforcement action taken, 1 under investigation
Light-duty vehicles	2	2 referred to appropriate agency or group within CARB
Smoking vehicle	46	10 enforcement action taken, 35 under investigation, 1 not actionable
Solid waste collection vehicle	1	Under investigation
Tampering	1	Under investigation
Transport Refrigeration Unit	1	Not actionable
Truck and Bus	7	2 enforcement action taken, 3 under investigation, 2 not actionable

While CARB did not receive any complaints for oil and gas during that timeframe, CARB accepts and addresses all air quality complaints as they come into the system, including mobile sources and oil and gas facilities (**Table 4-4**).

Enforcement Considerations

1-163 An effective enforcement program must be flexible and adaptable to address the needs of the communities. Part of being adaptable is the ability to identify and address gaps in the enforcement process, such as previously unknown facilities or new pollutants of concern. As revealed over the course of the public process for CERP development, one such gap has been a lack of communication with members of the community, who have firsthand experience with local emissions sources and whose input can be extremely valuable to enforcement efforts.

Commented [35]: Perhaps we can add ground truthing here. and also address data gaps

1-164 Enforcement mechanisms are designed to promote and, if necessary, compel compliance by regulated sources. As discussed above, after South Coast AQMD inspectors investigate complaints and/or conduct facility inspections, they can issue NCs or NOVs. While a NC will generally require further action by a source, NOVs are referred to the Office of the General Counsel, where agency attorneys negotiate potential civil penalties. If no settlement is reached, a civil lawsuit can ultimately be filed in superior court. Ongoing noncompliance, however, may lead to a petition for an Order of Abatement before the South Coast AQMD Hearing Board, which would have the authority to require a facility to take specific actions to achieve compliance. CARB

Commented [36]: this can be summarized in a timeline visual - process graph

[17] There may be some overlap between complaints with the Southeast Los Angeles AB 617 community.

[18] Enforcement action means a violation occurred and CARB worked with the violator to resolve it. Under investigation means the investigation is on-going. Not actionable means there was incomplete information to take action, or the vehicle was in compliance. Referred to another agency means the complaint was assigned to the appropriate agency for resolution.

and South Coast AQMD have each had a presence in this community, which has led to various enforcement actions against local facilities.[19]

In summary, the compliance process seeks to ensure that all rules and regulations are followed through a fair and robust enforcement program, resulting in reduced air pollution emissions. Adaptability is crucial, whether in the programs overall, or in day-to-day operations, to ensure that community concerns are addressed quickly and that enforcement action is taken when violations are identified.

Both CARB and South Coast AQMD enforcement teams will continue to search for innovative strategies, lead in community transparency, and take swift action to address non-compliance.

[19] Additional details on South Coast AQMD and CARB enforcement actions will be provided in Appendix 4.

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution

Community Air Quality Priorities

Through the development of the South Los Angeles (SLA) Community Emissions Reduction Plan (CERP) and based on sources of air pollution that are of concern to the community, the Community Steering Committee (CSC) identified the following air quality priorities:

1-165
- mobile sources,
- auto body shops,
- general industrial facilities,
- metal processing facilities,
- and oil and gas facilities.

Commented [1]: add images

These air pollution sources are often near homes, schools, and other areas where the community can be exposed to harmful pollutants. To reduce air pollution from these sources, the CSC developed a set of actions to be implemented by government agencies, community-based organizations, businesses, and other entities, as described in the following subchapters.

1-166

Commented [2]: why implemented by community based organizations? this is the whole responsibility of the local district and CARB to implement these actions, not on CBO's

1-167 Subchapters 5b through 5f focus on each air quality priority identified by the CSC.

1-168 ## Ongoing Efforts

Commented [3]: I dont think this is the appropriate title for this section, perhaps is Cross-sectoral Agencies Collaboration ? something like that

Multiple government agencies may be involved when addressing an air quality priority, as each agency has its own specific authority, or jurisdiction, to protect the environment and community. Authority is dependent on the specific aspects of a facility, including the equipment, materials used, pollutant, operations, processes, hazardous waste, health impact, and type of environmental impact.

1-169 The South Coast Air Quality Management District (South Coast AQMD), California Air Resources Board (CARB), and United States Environmental Protection Agency (U.S. EPA) develop, implement, and enforce air quality regulations to reduce air pollution from mobile sources such as trucks and locomotives and stationary sources such as dry cleaners, refineries, power plants, factories, and metal processing facilities. Additionally, South Coast AQMD and CARB may be developing new requirements that would further reduce air pollution from sources prioritized by the community.

Commented [4]: can be a hierarchical graph instead

1-170

Commented [5]: "may" be ? what does that mean?

In areas where South Coast AQMD and CARB do not have direct authority (jurisdiction), implementation of the AB 617 program may include informing the CSC of ongoing efforts conducted by other responsible agencies. For example, the California Geologic Energy Management Division (CalGEM), a state agency, is developing a public health rule to update public health and safety protections for communities near oil and gas production operations,

which includes prohibiting new oil wells within a certain distance of sensitive receptors. Local land-use agencies can establish long-term goals, ordinances, and policies for land use that can also have an impact on local air pollution (e.g., LA County Green Zones Program[1], LA County Oil Well Ordinance[2], prohibition of new oil and gas extraction[3]).

1-171 One of the requirements of AB 617 is that air districts must expedite implementation of Best Available Retrofit Control Technology (BARCT) for facilities in the California Greenhouse Gas Cap-and-Trade program. South Coast AQMD's REgional CLean Air Incentives Market (RECLAIM) program includes facilities within the California Greenhouse Gas Cap-and-Trade program. In 1-172 2017, South Coast AQMD began this process and, to date, has established BARCT emissions limits for ten rules and is currently developing or amending four additional rules. There are three 1-173 RECLAIM facilities in the SLA community boundary.

Opportunities for Action

In addition to the ongoing efforts described above, South Coast AQMD, in collaboration with the CSC, identified goals to reduce air pollution in the SLA community. For each air quality priority, this CERP defines a path for further reductions of emissions and exposure through identifying 1-174 goals with corresponding action(s), metric(s), timeline(s), and responsible entities. This path utilizes strategies, including rules and regulations,[4] air monitoring, enforcement, incentives, collaborations, and information and outreach to achieve localized reductions, share emissions data, and provide other related information to address the community's concerns. Further, the 1-175 CSC requested that the community be involved in implementing this CERP and suggested that agencies work with community-based organizations to invest in community projects.

Emissions Reduction Targets

Commented [6]: This was so confusing. I don't know what you are trying to say here. perhaps explain each program and how those are related to BARCT

Commented [7]: how is this relevant with the above paragraphs? seems disconnected

Commented [8]: which rules? list them out? provide context, and what did these rules do?

Commented [9]: can be a graph

Commented [10]: the community projects is a real opportunity for action and we should further expand on this what those would look like and how it would support the community

[1] The LA County Green Zones Program enhances public health and land use compatibility in the unincorporated communities that bear a disproportionate pollution burden. More information can be found at: https://planning.lacounty.gov/greenzones#:~:text=Initiated%20by%20the%20Board%20of,bear%20a%20disproportionate%20pollution%20burden

[2] The LA County Oil Well Ordinance will update permit requirements and development operating standards for existing and new oil wells and accessory facilities in unincorporated LA County. More information can be found at: https://planning.lacounty.gov/oilwell

[3] On January 26, 2022, the City of Los Angeles City Council passed a recommendation for the mayor to develop an ordinance requiring a new policy be drafted to prohibit new oil and gas extraction, make extraction activities a nonconforming use in all zones, ensure plugging and abandonment of wells, and conduct comprehensive site remediation. More information can be found at: https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0447

[4] At South Coast AQMD, a regulation is composed of rules, each of which deals with a specific topic within that regulation. More information can be found here: http://www.aqmd.gov/home/rules-compliance/regulations#:~:text=At%20South%20Coast%20AQMD%2C%20a,and%20administered%2C%20and%20their%20impact

AB 617 requires emissions reduction programs, such as this CERP, to include emissions reduction targets.[5,6] This CERP will project emissions reductions for nitrogen oxides (NOx) and diesel particulate matter (DPM) in tons per year (tpy). To accurately determine emissions reductions, a baseline is established based on the year prior to community designation[7] (as described in Chapter 3b – Emissions Inventory and Source Attribution).

Table 5a-1: CERP Emissions Reduction Targets includes an emissions baseline for 2019, projected future baseline emissions for 2026 and 2031, emissions reductions from this CERP in 2026 and 2031, and an overall percentage of emissions reductions from 2019.

Table 5a-1: CERP Emissions Reduction Targets

Year	Emissions	NOx*	DPM*
2019	Baseline Emissions (tpy)**	3,339	41.14
2026	Projected 2026 Baseline Emissions (tpy)**	2,179	18.22
	Emissions Reductions from CERP (tpy)	TBD	TBD
	Overall Emissions Reductions from 2019 (%)	TBD	TBD
2031	Projected 2031 Baseline Emissions (tpy)**	1,957	15.93
	Emissions Reductions from CERP, by 2031 (tpy)***	TBD	TBD
	Overall Emissions Reductions from 2019 (%)	TBD	TBD

1-176

* Estimated emissions reduction targets will be finalized as part of the Final CERP presented to Governing Board on June 3, 2022.

** Emissions were developed and presented in tons per day unit in Chapter 3b and Appendix 3b.

*** Estimated emissions reduction targets from this CERP, by 2031 include TBD tpy NOx and TBD tpy DPM from projected incentive projects.

Commented [11]: can this be summarized in percentages? like how much emissions reductions are expected by 2026 - 30% ? might be easier to read than Tons/year,

Estimated Emissions Reductions from CARB Statewide Measures

1-177

CARB's statewide strategy provided in this CERP accounts for the combined effects of regulations currently under rulemaking for a future year. Potential emissions reductions from proposed

Commented [12]: It could be helpful to understand how emissions reductions targets are set for transparency as well. Maybe, the point could be made that the combined targets set a higher standard (or whatever framing makes sense) for emissions target and an example with numbers could be put in a callout box, so people can read if they want to know or just skip over it.

[5] California Health and Safety Code Section 44391.2 (c)(3)

[6] CARB, Community Air Protection Blueprint, https://ww2.arb.ca.gov/sites/default/files/2018-10/final_community_air_protection_blueprint_october_2018_appendix_c.pdf

[7] SLA is considered as a 2020-designated community, despite its delayed designation by CARB in February 2021.

regulations for a specified year are applied to account for multiple regulations that may affect a specific source category. For example, if two regulations are applicable to the same source of emissions (e.g., trucks) then a new baseline is established by applying the statewide reduction factors from the first proposed regulation to the original baseline, and then reductions from the second regulation are calculated based on the newer established baseline.

It is important to note that most of these regulations are in early phases of development and their adoption and implementation timelines have not yet been established. Additionally, the statewide emission inventory used to estimate the potential emission reduction factors for these strategies are derived from draft regulatory inventories that will continue to be revised through the regulation development process. Once a statewide strategy or regulatory measure is adopted, emission reduction factors and related benefits will be updated to reflect the final inventory used in the regulation. Accordingly, the draft statewide emissions reduction estimates presented in this CERP should only be used as rough estimates that are subject to change in the future.

CARB has estimated the emissions reductions benefits for some of the proposed statewide measures as shown in Table 5a-2: Emissions Reduction Targets for CARB Statewide Measures for the 2026 and 2031 milestone years for the SLA community. The "Action Date" listed in **Table 5a-2** reflects the year of the anticipated adoption date by CARB's Governing Board.

Table 5a-2: Emissions Reduction Targets for CARB Statewide Measures[†]

1-178

Proposed Statewide Measure	Action Date	Emissions Reductions Targets 2026/2031 (tpy)							
		NOx		VOC		DPM		PM2.5	
		2026	2031	2026	2031	2026	2031	2026	2031
Advanced Clean Fleet[8]	2023	5.3	24	-	-	0.0	0.0	0.1	0.6
Advanced Clean Car 2[9]	2022	2.1	27	1.3	21	0.0	0.0	0.6	7.6
Heavy-Duty Inspection and Maintenance[10]	2021	122	140	-	-	1.0	1.0	1.0	1.0
Small Off-Road Engine Amendment[11]	2021	19	60	144	416	-	-	1.4	3.9
Transport Refrigeration Unit Regulation[12]	2022	3.5	8.5	0.4	1.1	1.3	2.8	1.2	2.6
	Total	**152**	**259**	**146**	**438**	**2.3**	**3.8**	**4.2**	**16**

† Emissions reduction targets based on estimates from CARB. Emissions reductions are subject to future assessment and regulatory analysis that may result in adjustments.

Commented [13]: same as above, can these be summarized in %?

[8] CARB, Advanced Clean Fleet Rules, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets

[9] CARB, Advanced Clean Car 2, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program

[10] CARB, Heavy-Duty Inspection and Maintenance, https://ww2.arb.ca.gov/our-work/programs/heavy-duty-inspection-and-maintenance-program

[11] CARB, Small Off-Road Engine (SORE), https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore

[12] CARB, Transport Refrigeration Unit Regulation, https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/new-transport-refrigeration-unit-regulation

1-179 # Chapter 5b: Mobile Sources

Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads lead discussions with CSC members to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). One of the concerns raised by the South Los Angeles (SLA) community is mobile sources, in particular, emissions from vehicles and equipment at construction sites. Concerns from vehicles include emissions and adverse health impacts from heavy duty diesel trucks, trains, buses, and automobiles due to neighborhood traffic, freeway rush hour traffic, truck and bus maintenance in residential neighborhoods, movement of goods at warehouses, and the proximity of truck routes and idling trucks to residential areas and schools. The community also expressed many questions about the existing inspection programs and what is included in the term "in compliance" given the level of problems the community was experiencing with mobile source pollution.

1-181

1-180

1-182

Commented [1]: do subchapters for mobile sources - one for neighborhood traffic

Commented [2]: community concerns also included - further definition of mobile sources and compliance and inspections programs for truck idling

Commented [3R2]: Ice cream trucks too were identified as a concern

Commented [4R2]: incentives for small businesses and vendors to retrofit their trucks

1-183 Add pictures

1-184 The concerns the community expressed with construction sites are primarily emissions from diesel construction equipment and potential exemptions for operations and projects.

Commented [5]: emissions exemptions or regulatory exemptions?

Commented [6R5]: Some large scale long term construction projects are not fully regulated , nor are the emissions from them accounted for given the lack of local monitoring and or reporting. We should ask them to include a section that explains how construction is addressed in their regulation. i

The CSC identified mobile sources as an air quality priority because of the volume and frequency of vehicles and trains that travel through SLA. This community is bounded by Interstate 10 (I-10) to the north, Interstate 710 (I-710) and the Alameda Corridor to the east, and State Route 91 (SR-91) to the south, with Interstate 105 (I-105) and Interstate 110 (I-110) crossing through the community boundary (**Figure 5b-1**). Various types of mobile sources, including light, medium, and heavy-duty vehicles travel along these routes and expose residents to harmful air pollutants. Additionally, the I-710, I-110, and Alameda Corridor are vital transportation routes for goods movement out of the Ports of Los Angeles and Long Beach, which are the busiest container ports in the United States.[1]

1-185

1-186

Commented [7]: and the Slauson Corridor

Commented [8]: highlight the highways in the map so those can be clearly identified

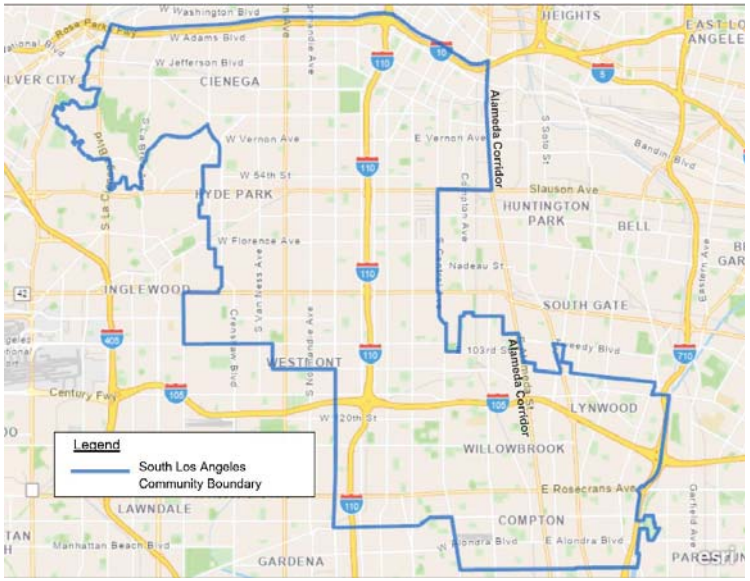
[1] Industrial Warehousing in the SCAG Region, https://scag.ca.gov/sites/main/files/file-attachments/task2_facilityinventory.pdf?1604268149

Regulatory Background

The California Air Resources Board (CARB) primarily regulates mobile sources. Local air districts and other agencies may be given authority to enforce CARB's mobile source regulations. For example, the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling,[2] also known as the "No-Idling Regulation," may be enforced by police officers and air districts. To support AB 617's broader effort, CARB also oversees and approves use of the Community Air Protection (CAP) Incentives,[3] which provide mechanisms to expedite air quality benefits to impacted communities for a variety of project types including commercially available cleaner technology trucks, electric school buses for low-income schools, and locomotives.

[2] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling

[3] CARB, Community Air Protection (CAP) Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives



Actions to Reduce Emissions or Exposure

For mobile sources, the CSC requested additional enforcement of mobile source regulations and outreach efforts to inform the community about and increase availability to incentives programs, such as affordable alternative energy vehicles for the community. Mobile source categories of concern identified by the CSC include: heavy duty diesel trucks, trains, buses, and automobiles due to neighborhood traffic, freeway rush hour traffic, truck and bus maintenance in residential neighborhoods, movement of goods at warehouses, and the proximity of truck routes and idling trucks to residential areas and schools.

The CSC requested the following goals for mobile sources in SLA:

A. Reduce exposure to emissions from warehouses and idling of buses and trucks.
B. Reduce students' exposure to air pollution, especially mobile source emissions at schools.
C. Inform the community, businesses, and industries of CARB's mobile source regulations, best practices, and incentive programs.

1-187

D. Incentivize funding opportunities for cleaner mobile source technologies (e.g., lower emitting trucks) within the community (e.g., schools, small businesses, independent truck owners and operators).

E. Reduce emissions at construction sites.

The CSC developed the following CERP actions to address community concerns regarding the five CERP goals. **Table 5b-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from mobile sources in SLA.

Table 5b-1: Actions to Reduce Emissions from and Exposure to Mobile Sources

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Warehouses and Idling	• Conduct truck and bus inspections at locations of concern identified by the CSC • Conduct outreach to warehouses regarding South Coast AQMD Rule 2305 requirements to reduce the impact of truck traffic • Enforce ISR and conduct frequent warehouses inspections • Distribute outreach materials to the community on mobile source regulations and how to file a complaint with CARB • Install "No Idling" signs in CSC-identified locations and create "Children Breathing No Idling Zones" for schools • Increased enforcement of CARB's Truck and Bus 2 and Idling Rules to reduce diesel emissions (including during non-business hours)	CARB South Coast AQMD	• Number of truck and bus inspections in CSC-identified locations • Number of materials distributed to warehouses • Number of outreach events or materials distributed to the community • Number of signs installed	3rd quarter, 2022	2nd quarter, 2027

1-188 **Commented [9]:** add ice cream/food trucks

1-189 **Commented [10]:** - Increased enforcement of CARB's Truck and Bus2 and Idling3 Rules to reduce diesel emissions (including during non-business hours)
• Accountability for truck owners and truck drivers, when trucks violate CARB idling regulations

1-191 **Commented [11R10]:** Conduct idling sweeps (which may require coordination with local law enforcement), focusing on high priority areas

Commented [12]: enforcement of the ISR rule

1-190 **Commented [15]:** Maybe also, number of warehouses who indicate understanding of rule requirements and if applicable share support needed to comply with the rule

1-194 **Commented [13]:** Also I recall a community member mentioning outreach to truck unions trying to get at strategies that work directly with workers/managers

1-192 **Commented [16]:** Maybe also, number of feedback forms collected from the community to assess ease of use or concerns with the complaint filing system?

1-195 **Commented [14]:** to help protect children from harmful diesel emissions

1-193

1-196 1-197 1-198 1-199	• Accountability for truck owners and truck drivers, when trucks violate CARB idling regulations • Conduct idling sweeps (which may require coordination with local law enforcement), focusing on high priority areas • Conduct and coordinate idling truck inspections with the California Highway Patrol • Based on findings from idling sweeps, the CSC identified Community Priorities List, and additional community observations/input from CSC meetings, • CARB will adjust enforcement in the community to address the identified concerns and report back to the CSC bi-annually for future adjustments				
B: School Air Filtration	• Work with local school districts and CSC members to identify and prioritize schools for air filtration systems • Install air filtration systems according to prioritization list and identified funding source criteria	South Coast AQMD	• Number of identified funding sources for school air filtration systems • Total incentive dollars allocated for air filtration systems • Provide prioritization list to receive air filtration systems • Number of schools that install air filtration systems[4]	1st quarter, 2023	2nd quarter, 2027
1-201	• work with school district to inspect filtration systems and ensure these are well kept and maintained				

1-200

Commented [17]: what about retrofit buses for schools?

Commented [18R17]: The goal for this is to reduce student's exposure to mobile sources pollution, how are school air filtration systems reducing exposure , what about recess time, and outside pick up time? This action is not consistent with the goal, so it should add retrofit buses

[4] Total number of schools to receive air filtration systems is dependent on total AB 617 CAP Incentives allocated or identification of other funding sources for installation of air filtration systems in SLA.

1-202 1-203 **Agencies collaboration** 1-204 1-205	• Work with the local city or county agencies to evaluate potential **designated truck routes away from sensitive receptors** (e.g., schools, residents) and identify resources to enforce these route • Work with school districts to identify funding, projects, and collaborations opportunities to retrofit school buses/electrify buses in areas of concern, or collaborate in projects/funding for community projects such as "safer routes to schools" • Work with local agencies to provide data on locations within the community with high truck pollution impacts • • Identify the appropriate agency (e.g., Los Angeles Department of Transportation) to collaborate on assessing the feasibility of physical interventions to prevent truck traffic from entering residential neighborhoods				
C: CARB Resource Outreach 1-206	• Conduct outreach to the community on CARB's mobile source regulations, best practices, and incentive programs (e.g., provide materials to independent owners or operators and students to share with families) • Conduct focused enforcement of CARB's TRU Regulation, Drayage Truck Regulation, and Truck and Bus Regulation	CARB South Coast AQMD	• Identify outreach opportunities • Number of outreach events or materials distributed	4th quarter, 2022	2nd quarter, 2027

D: Mobile Source Incentives 1-207a 1-207b 1-208a 1-208b 1-208c	• Create a tool for communities to easily see who and where current incentives are being provided • Develop a hyper local incentive program for cleaner mobile source technologies (e.g., lower emitting trucks) within the community (e.g., schools, small businesses, independent truck owners and operators) • Identify additional and new incentive funding opportunities to replace and accelerate adoption of cleaner heavy-duty trucks (including drayage trucks), prioritizing zero emission technologies when technologically feasible and commercially available, and near-zero emission technologies until that time • Target incentive funds for local small businesses and independent owner/operator (e.g., Voucher Incentive Program) • Identify funding and community project opportunities to support communities transition to electric cars, through trade in programs, and increase the number of options for electric plug-ins for cars by collaborating with the City and CBO's.	South Coast AQMD	• Number of identified funding sources for cleaner mobile source technologies • Total incentive dollars allocated for cleaner mobile source technologies • As needed, develop and submit AB 617 Project Plan(s)[5]	1st quarter, 2023	2nd quarter, 2027
E: Construction Sites Enforcement 1-209 1-210	Explore new rules for Construction sites and explore focused enforcement at construction sites of concern, as identified by the CSC, to verify compliance with South Coast AQMD rules	South Coast AQMD CARB	Number of enforcement updates to the CSC	4th quarter, 2022	2nd quarter, 2027

Commented [19]: expand to communities

Commented [20]: for all construction sites

Commented [21]: how if some of these operations are exempted?

[5] CARB, Community Air Protection (CAP) Incentives, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives

1-211	Enforce new rules rules for all construction sites, not just those of concern				

Chapter 5c: Auto Body Shops

Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC identified auto body shops as an air quality concern for this community. During the CSC meetings, concerns were raised regarding the volume and activities of both permitted and unpermitted auto body shops and their proximity to residences, schools, and public gathering areas. The CSC has also expressed concerns with soil and water contamination, proper hazardous waste disposal, land-use issues, worker exposure, and noise pollution from some auto body shops. CSC members identified facilities and operations conducted at vacant lots on Central Avenue, Florence Avenue, Western Avenue, Jefferson Boulevard, Manchester Avenue, and the Slauson Corridor as a few locations of concern. CSC members believe that these small businesses are likely unaware of existing regulatory requirements, best management practices to reduce pollution burden, and the health impact of their operations on the community.

1-212

Commented [1]: Add the Slauson Corridor

Commented [2R1]: from 500 ft /SCLA-PUSH

Regulatory Background

South Coast AQMD's permitting program was established to implement the requirements of the federal and state Clean Air Act (CAA), and applicable air quality rules and regulations by specifying operating and compliance requirements for stationary sources that emit air contaminants. Based on the South Coast AQMD permitting database, there are approximately 89 permitted[1] auto body shops within the SLA community boundary. Permitted auto body shops must comply with the requirements in the permit issued by South Coast Air Quality Management District (South Coast AQMD) as well as any applicable South Coast AQMD rules.

1-213

1-214

Commented [3]: A map with these would be helpful

Commented [4]: SCLA-PUSH data on unpermitted or missing auto body shops in official regulatory agencies data sets

In addition, PSR-LA through their ground-truthing efforts community data collected suggested that facilities-of-concern may be underestimated because these facilities are at times misidentified, misclassified, or simply missing in official databases. To address this data set challenge, PSR-LA conducted a rigorous data vetting process that included a detailed review of the SCAQMD facilities classifications, virtual Ground-Truthing Walks, and google map searches of existing facilities to identify missing or misclassified facility data. The vetting process revealed that approximately 20 facilities-of-concern were misclassified by SCAQMD. Out of the 11

1-215

[1] Any equipment that emits or controls air contaminants (such as nitrogen oxides or reactive organic gases) requires a permit from South Coast AQMD prior to construction, installation, or operation unless it is specifically exempted from the permit requirement by South Coast AQMD per Rule 219 – Equipment not Requiring a Written Permit Pursuant to Regulation II. http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf

1-215 cont. "unclassified facilities," 3 were undoubtedly auto body shops (i.e., Hello Auto Body, Jimenez Body Shop, and Fine Line Body Shop, INC).Data collected by South LA Co Lead also identified non permitted auto body facilities.

1-216 Auto body shops conduct a variety of operations specializing in the repair of vehicles by fixing paint or body damage from scratches, dents, and collisions. Coating application equipment, emissions from automotive coating, and solvent cleaning materials and their related operations conducted by auto body shops may be subject to South Coast AQMD's Rules, such as Rules 481,[2] 1151,[3] 1168,[4] and 1171.[5] If vehicles are not present but coating applications are being conducted to metal parts, auto body shops may be subject to Rule 1107.[6] CARB's Consumer Products Regulation[7] may apply to the products used at auto body shops. Some of these products may cause odors and emit air pollutants, including volatile organic compounds, and may include toxic air contaminants. The emissions and odors may come from solvents evaporating from paint and solvent application, cleaning of parts, and improper storage. Auto body shops may also conduct operations such as sanding and grinding, which can emit fine dust. Auto body shops subject to CARB's Criteria Pollutant and Toxics Emissions Reporting (CTR) regulation will begin reporting emissions to South Coast AQMD in spring of 2025.[8]

Commented [5]: describe these rules in the document, not just a footnote

Actions to Reduce Emissions or Exposure

During development of this CERP, the CSC requested that both outreach and enforcement be conducted at auto body shops to inform these businesses of operational requirements mandated by various government agencies with authority over this industry, such as

1-217 South Coast AQMD, local land-use agencies, and local fire departments. The CSC requested the following goals for auto body shops in SLA.

Commented [6]: Include improvement and enforcement of SCAQMD rules for auto body shops, including Rule 1151: Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operation and Rule 1171: Solvent Cleaning Operations.

A. Inform the community of applicable rules and regulations, monitoring and enforcement efforts, and the permitting process as they relate to auto body shops.

1-218 B. Identify facilities of concern, conduct enforcement activity, and conduct outreach on best management practices at these facilities.

Commented [7]: best practices from EPA List for auto body shops to generate a list of equipment and operations that can potentially reduce adverse health impacts related to auto body shops air emissions and the extent to which these best practices lists can be integrated into the two above SCAQMD rules.

Commented [8R7]: https://www.epa.gov/collision-repair-campaign/about-collision-repair-campaign#overview

[2] South Coast AQMD, Rule 481 – Spray Coating Operations, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-481.pdf
[3] South Coast AQMD, Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1151.pdf
[4] South Coast AQMD, Rule 1168 – Adhesive and Sealant Applications, https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1168.pdf
[5] South Coast AQMD, Rule 1171 – Solvent Cleaning Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1171.pdf
[6] South Coast AQMD, Rule 1107— Coating of Metal Parts and Products, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1107.pdf
[7] CARB, Consumer Product Regulation, https://ww2.arb.ca.gov/our-work/programs/consumer-products-program
[8] CARB, Criteria Pollutant and Toxics Emissions Reporting, https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting

C. Make referrals from auto body shop inspections to the appropriate agencies to ensure these facilities follow rules and regulations from other agencies, in particular those related to soil contamination, hazardous waste disposal, land-use, and noise pollution.
D. Inform auto body shops of best practices and applicable rules and regulations, and provide information on South Coast AQMD's Small Business Assistance program.[9]
E. Conduct air measurement surveys to identify facilities with potential elevated emissions and to characterize these emissions.
F. Ensure facilities are properly classified and verify compliance with applicable rules and regulations.

Additional information regarding Rule 1151 and Rule 1171:

Table XX EPA Best Practices for Auto Body Shops Listed by EPA's Collision Repair Campaign

Category	Benefits
NESHAP Requirements	
Painter training and certification	• Improves techniques, reduces paint usage and emissions
Ventilated spray booths with filters that are at least 98% efficient	• Removes paint overspray from the air • Less contact with hazardous coating materials
High transfer efficiency (high volume/low pressure) guns such as (HVLP) spray runs	• Less toxic chemical exposure to painters • Less hazardous emissions to the environment • Dollar saving in paint costs for the shop
Prohibit clean spray guns by spraying solvent through the gun, creating an atomized mist	• Minimizes contact with hazardous solvents • Minimizes emissions of hazardous chemicals into the air
Record keeping	• Increases compliance with emission reduction requirements
Best Practices	
Use vacuum sanding or wet sanding	• Uncontrolled dust likely containing toxic materials creating adverse emissions and worker exposure • Properly maintained vacuum sanders control 93-98% of dust • Vacuum sanders can pay for themselves over time by eliminating expensive re-paints, shortening cleanup time, and extending sandpaper life

1-219

[9] South Coast AQMD, Small Business Assistance, http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance

Performing solvent wipe downs in a ventilated booth or prep station	• Solvents evaporate off surfaces wiped down and dried off creating adverse emissions, occupational exposure
Use automated gun cleaners	• Increases mileage from cleaning solvents • Reduces emissions and occupational exposure • Reduces shop waste
Use low VOC solvents	• Reduces VOC emissions
Use low VOC or water-based cleaners	• Reduces or eliminates VOC emissions
Use low VOC or water-based primers	• Reduces or eliminates VOC emissions
Use low VOC or water-based base coats	• Reduces or eliminates VOC emissions
Use of extremely low VOC products for clear coats	• Reduces VOC emissions
Mixing paint in a well ventilated mixing room	• Reduces emissions and occupational exposure
Using computerized paint mixing systems	• Reduces waste by increasing efficiency paint generated
Store and reuse left-over primers and base coats	• Reduces waste
Keep all containers shut when not in use	• Reduces emissions and occupational exposure
Use gasket-sealed spring-loaded covers on solvent storage containers and waste drums	• Reduces emissions and occupational exposure
Designate a health and safety manager	• Increases efficiency of emissions control interventions
Establish a respiratory filter change out program	• Reduces occupations exposure
Make Material Safety Data Sheets available to shop workers	• Increases worker awareness of toxicity of chemicals leading to greater care in chemical use
Follow OSHA guidelines regarding Personal Protective Equipment	• Reduces occupational exposure

1-219 cont.

Overlaying these best practices onto two SCAQMD rules showed that while some of these best practices were integrated into these rules, other best practices were not. As discussed above, auto body shops in the greater Los Angeles region are required to comply with SCAQMD rules and should integrate the following practices, as part of the permitting process for auto body shops.

Table XX Degree of Integration of EPA Auto Body Shops Best Practices into SCAQMD Rule 1171

EPA Best Practice	Degree of Integration
Use of low VOC solvents	Yes
Use of automated gun cleaners	No. Listed but not required
Perform solvent wipe downs in a ventilated booth or prep station	No

Use of low VOC or water-based cleaners	Yes: to low VOC cleaners No: to required use of water-based cleaner if viable
Keep all containers shut when not in use:	Yes
Use gasket-sealed spring-loaded covers on solvent storage containers	No

1-219 cont.

Table XX Degree of Integration of EPA Auto Body Shops Best Practices into SCAQMD Rule 1151

EPA Best Practice	Degree of Integration
Use vacuum sanding or wet sanding	No
Use low VOC or water-based primers	Yes: to low VOC primers No: to required use of water-based
Use low VOC or water-based base coats	Yes: to low VOC primers No: to required use of water-based
Use of extremely low VOC products for clear coats	Yes
Mixing paint in a well ventilated mixing room	No
Store and reuse left-over primers and base coats	No
Keep all containers shut when not in use	No
Use gasket-sealed spring-loaded covers on waste drums	No

Commented [9]: ensure actions for autobdy shops include amendments of rules 1151 and 1171 to integrate EPA best practices for auto body shops to reduce emissions, and include enforcement of this rules via the permitting process,

Commented [10R9]: We have this research that we can provide SCAQMD

The CSC developed the following CERP actions to address community concerns regarding the six CERP goals. **Table 5c-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from auto body shops in SLA.

Table 5c-1: Actions to Reduce Emissions from and Exposure to Auto Body Shops

Goal	Action(s)	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete

A: Inform Community of Pertinent Rules 1-220	• Conduct a workshop for the CSC describing applicable rules and regulations, permitting process, and enforcement efforts around auto body shops. • Collaborate with partner agencies who also have jurisdiction over auto body shops (e.g., local land-use agencies, Bureau of Automotive Repair, Department of Toxics Substances Control (DTSC), Certified Unified Program Agencies (CUPA), local fire departments) to present information and safer alternatives and processes to reduce emissions and exposres .	South Coast AQMD	Conduct Auto Body Shops Workshop for the CSC	1st quarter, 2023	2nd quarter, 2025
B: Identify Facilities of Concern	• Identify and prioritize locations of concern • Conduct enforcement activity	South Coast AQMD	• Develop list of identified and prioritized locations of concern, in part using data reporting from CARB's CTR regulation • Number of inspections	2nd quarter, 2022	2nd quarter, 2026
C: Agency Referrals	Refer auto body shops to appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD's jurisdiction (e.g., Bureau of Automotive Repair, California Division of Occupational Safety and Health (Cal/OSHA), CUPA, public health departments, DTSC, local fire departments)	South Coast AQMD	Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC	2nd quarter, 2022	2nd quarter, 2027
D: Outreach to Owners and Operators	Conduct targeted outreach to owners and operators in the SLA community, including providing information on best management practices, South Coast AQMD's Small Business	South Coast AQMD CSC	• Number of outreach events or materials distributed to auto body shops	2023	2025

1-221

Commented [11]: what would this look like? further expand how the enforcement will ocurr

1-222

Commented [12]: not just refer, but promote and clear collaborations that can yield opportunities for reducing emissions and increasing enforcement and compliance

	Assistance Program, permitting process, and applicable rules and regulations		• Number of auto body shops outreached		1-223
E: Air Measurements Survey	Conduct initial air measurements surveys near facilities of concern (as identified under action B) to identify and characterize any potential emissions	South Coast AQMD	• Number of air measurements surveys • Provide updates to the CSC	2nd quarter, 2022	2nd quarter, 2027
1-224 **F: Focused Facility Enforcement**	Conduct door-to-door focused enforcement of potential auto body shops in a CSC-identified area to ensure facilities are properly classified and to verify compliance with applicable rules and regulations -Amendment to rules 1151 an 1171 to include EPA best practices in the permitting process for auto body shops as BACT -Overlay EPA best practices onto two SCAQMD rules 1151 and 1171 showed that while some of these best practices were integrated into these rules, other best practices were not. As discussed above, auto body shops in the greater Los Angeles region are required to comply with SCAQMD rules and should integrate the following practices, as part of the permitting process for auto body shops.	South Coast AQMD	• Identify area for targeted enforcement inspections • Number of inspections • Provide updates to the CSC	2023	2024

Commented [13]: Number of autobody shops who indicate understanding of best practices, Small Business Assistance Program, permitting process, ect via a feedback form or sign up commitment to improve their practices?

Commented [26R24]: sanding dust from auto body operations as likely to contain toxic materials, that vacuum sanders control 93-98% of sanding dust, that purchasing vacuum sanders can pay for themselves by reducing labor time and reducing material costs, and recommends vacuum sanding as an EPA best practice. integrating vacuum sanders in Rule 1151 as a ...

Commented [14]: add amendment to rules 1151 an 1171 to include EPA best practices in the permitting ...

Commented [15R14]: integrating in water-based coating into Rule 1151 on

Commented [16R14]: sanding dust from auto body operations as likely to contain ...

Commented [17]: ensure actions for autobdy shops include amendments of rules 1151 and 1171 to ...

Commented [18R17]: We have this research that we can provide SCAQMD

Commented [19]: add amendment to rules 1151 an 1171 to include EPA best practices in the permitting ...

Commented [20R19]: integrating in water-based coating into Rule 1151 on

Commented [21R19]: sanding dust from auto body operations as likely to contain ...

Commented [22]: ensure actions for autobdy shops include amendments of rules 1151 and 1171 to ...

Commented [23R22]: We have this research that we can provide SCAQMD

Commented [24]: add amendment to rules 1151 an 1171 to include EPA best practices in the permitting ...

Commented [25R24]: integrating in water-based coating into Rule 1151 on

1-225 # Chapter 5d: General Industrial Facilities

Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) community expressed concerns about emissions from and exposure to various stationary sources that are categorized as general industrial facilities, such as pallet manufacturers, recycling centers, chemical manufacturing, dry cleaners, gas stations, tire manufactures, and decommissioned facilities. The CSC highlighted specific locations of unknown types of industrial facilities that were of concern to them within SLA.

1-226

CSC members have identified dry cleaners as a category of concern due to the adverse health effects associated with solvents used in this process. One CSC-identified concern with dry cleaners is the use of perchloroethylene (PERC), a carcinogen, as a solvent, which was a common solvent used for dry cleaning.[1] As of January 1, 2021, Rule 1421[2,3] required all dry cleaning equipment utilizing PERC within the jurisdictional boundary of South Coast AQMD to be removed from service and facility owners switched to new dry cleaning systems using other compliant solvents (Rule 1102[4]) or water-based systems. CARB and South Coast AQMD conducted training to assist in the implementation of the statewide phase out of PERC. Additionally, South Coast AQMD established a financial incentive grant program, totaling $4.2 million, which assisted dry cleaners to make an early transition to non-perc alternative cleaning technologies.

1-227

1-228

1-229

South Los Angeles, there is a cumulative over concentration of these hazardous facilities, dry cleaners using PERC, that are linked to the development of chronic diseases in sensitive populations and workers. Dry Cleaners currently using Perchloroethylene are exposing their workers, communitinites nearby, and consumers to a variety of health impacts. Short-term: Breathing high levels of perchloroethylene for a short time can cause: dizziness, drowsiness, headache, nausea and vomiting, lack of coordination, irritation of the eyes and respiratory tract. Additionally, Long-term health impacts may include: cancer.

1-230

[1] South Coast AQMD, Governing Board Meeting December 6, 2002, Agenda Item 37, http://www.aqmd.gov/nav/about/governing-board/agendas-minutes

[2] South Coast AQMD, Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems, https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1421.pdf

[3] South Coast AQMD, Notice to Owner/Operator of Perchloroethylene (Perc) Dry Cleaning Equipment, http://www.aqmd.gov/docs/default-source/compliance/industrial-advisories/notice-to-existing-perc-dry-cleaners-(dec-18-2020).pdf

[4] South Coast AQMD, Rule 1102 – Dry Cleaners Using Solvents Other Than Perchloroethylene, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1102-dry-cleaners-using-solvent-other-than-perchloreothylene.pdf

Commented [1]: do subchapters for each facility listed in here

Commented [2]: add pictures

Commented [3]: add the hydrocarbons alternative

Commented [4]: but it does not exist anymore, so we should add that here

Commented [5]: how many dry cleaners in South LA were aid? add that here if none then that is a problem.

The California Air Resources Board passed a regulation to phase out Perchlorethylene by 2020, a chemical contaminant vastly used in Los Angeles as a solvent in Dry Cleaners. Perchlorethylene is a source of significant groundwater contamination and listed by the US Federal Clean Air Act as a hazardous air pollutant. As Perchlorethylene is being phased out, dry cleaners are being pushed to use other alternatives. The remaining dry cleaners are using hydrocarbons as a transition, which in addition to being combustible, was also a source of air and water pollution.

1-231 The hydrocarbon dry cleaning alternative has not been classified as a non-toxic alternative. While hydrocarbons have a potential impact on greenhouse gasses emissions and are explosive, many small dry cleaners owned by mostly immigrants and people of color have switched to this alternative of hydrocarbons. CARB has classified Professional Wet Cleaning And C02 dry cleaning alternatives as meeting the criteria as non-toxic and non-smog forming alternatives based on their relatively benign human health, environmental, and physical property hazard profile. This was identified as a concern by the CSC. Given that there are many abandoned and active dry cleaners in the community, CSC members were concerned regarding the support these businesses will need to transition to safer greener technologies.

Regulatory Background

There are approximately 354 general industrial facilities located within the SLA community boundary. These general industrial facilities conduct a variety of processes and include facility types such as chemical operations, dry cleaners, manufacturing operations, utility, and gas stations. South Coast AQMD's Facility INformation Detail (F.I.N.D.)[5] tool allows users to search for these permitted facilities by their facility ID number, name, address, permit number, application number, or Notice to Comply or Notice of Violation number. The F.I.N.D. tool provides detailed information for each facility, including equipment lists, emissions data for facilities subject to South Coast AQMD's or CARB's reporting rules, and compliance history. These facilities may be subject to South Coast AQMD rules that address odors, fugitive dust, and other emissions from facilities such as Rule 402,[6] 403,[7] 1137,[8] and 1147.[9]

[5] South Coast AQMD, Facility Information Detail (F.I.N.D.), http://www.aqmd.gov/nav/FIND
[6] South Coast AQMD, Rule 402 – Nuisance, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[7] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf
[8] South Coast AQMD, Rule 1137 – PM10 Emission Reductions from Woodworking Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1137.pdf
[9] South Coast AQMD, Rule 1147 – NOx Reductions from Miscellaneous Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1147.pdf

South Coast AQMD regularly inspects and enforces requirements at general industrial facilities. These are initiated by South Coast AQMD through routine facility inspections or prompted by outside parties through complaints, facility notifications, or agency referrals. Air pollution concerns received from the community are an important source of information. Complaints can be submitted anonymously by phone or online, but contact information is crucial to ensure that inspectors can gather all the necessary information to conduct effective investigations.

Actions to Reduce Emissions or Exposure

In the process of developing this CERP, members of the CSC requested to identify all the general industrial facilities that exist in the community, with a focus on specific locations to help address emission and exposure reduction efforts. CSC members requested information regarding the type of the facilities, activities conducted, compliance history, and the emissions resulting from operations at general industrial facilities in this community. Additionally, there were requests for training and education on South Coast AQMD's F.I.N.D. tool and the process for filing air quality complaints to increase the community's involvement in addressing air quality concerns. The CSC also stressed the importance of outreach and training to dry cleaners regarding green alternatives and any financial and technical support to aid in the transition to green technologies.

In addition to dry cleaners, the CSC requested that information, outreach, and training be provided to assist them in increasing the community's involvement in addressing air quality concerns related to land-use issues. The CSC requested the following goals for general industrial facilities in SLA.

A. Inform the community of applicable rules and regulations, compliance history, and available data as they relate to general industrial facilities so they may prioritize facilities of concern.
B. Identify emissions and exposure reduction measures to address prioritized concerns identified by goal/action A.
C. Enforce Rules 1102 and 1421, seek funding to support transition to community identified green alternatives, and conduct community outreach to owners and operators regarding green alternatives. 1-232
D. Make referrals from general industrial inspections to the appropriate agencies to ensure these facilities follow rules and regulations from other agencies, in particular those related to hazardous waste handling and disposal, soil and water contamination, and land-use issues. 1-233
E. Inform the community about the F.I.N.D. tool and how to file air quality complaints.

The CSC developed the following CERP actions to address community concerns regarding the five CERP goals. **Table 5d-1** summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from general industrial facilities in SLA.

Commented [6]: create new rule amendment to add Professional Wet Cleaning as BACT

Commented [7R6]: Create a new incentive and support program to allow ALL cleaners to switch from PERC and hydrocarbons to Professional Wet Cleaning.

Commented [8]: how is this going to be reported back to the CSC perhaps add report bac to the CSC on cross agencies collaborations/projects

Table 5d-1: Actions to Reduce Emissions from and Exposure to General Industrial Facilities

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Identify Facilities of Concern	• Prioritize general industrial facilities of concern • Inform CSC of applicable South Coast AQMD rules for the prioritized facilities • Inform CSC of three (3) year compliance history of the identified facilities, and identify enforcement gaps and needs to create a plan to improve enforcement outreach to small businesses with the CSC and business owners. (1-234) • Identify general industrial facilities clusters including and identify strategies to address aggregate numbers (Clusters) add to exposures and add to cumulative burden, how can this be addressed through regulatory actions (1-235) • Summarize available emissions and/or air pollution data collected at or near facilities • Identify general industries near sensitive receptors - concern with metal recyclers that are next to schools. (1-236)	South Coast AQMD	• Provide general industrial facility prioritization list • Provide applicable rules list for identified facilities • Provide compliance history for identified facilities • Provide emissions data, if applicable, for identified facilities	2023	2023

1-237	**B: Identify Strategies**	Based on findings from Goal A, identify emissions and exposure reduction measures, if appropriate - promote for best practices for facilities of concern in the permitting process -improve reporting/ complaints response system for small sources of pollution by conducting outreach and reporting enforcement actions regularly to the community. -create procedural changes in permitting processes for these facilities so these facilities get to compliance to help reduce emissions exposures. -create a small business/general industries incentives fund program or community/business project to promote the use of BACT and purchasing power of equipment that can mitigate emissions such as fences, electric operations, stacks that trap emissions on site, etc - Regulations + incentives	South Coast AQMD	Number of emissions and exposure reduction measures	2023	2nd quarter, 2027

1-238b	**C: Dry Cleaners**	• Enforcement of existing South Coast AQMD and CARB regulations (e.g., South Coast AQMD Rule 1102, South Coast AQMD Rule 1421, CARB Airborne Toxic Control Measure for Emissions of Perchloroethylene (Perc) from Dry Cleaning Operations (Dry Cleaning ATCM)) • create new rule amendment to rule 1102 to add Professional Wet Cleaning as BACT in the permitting process for new dry cleaners, to ensure new dry cleaners use BACT to reduce emissions and address legacy contamination • Create a new incentive and support program to allow ALL cleaners to switch from PERC and hydrocarbons to Professional Wet Cleaning, including amendment of funding from AB998 to ensure fee includes hydrocarbons and can fund transition to PWC. • Identify incentive opportunities to transition to community-identified green alternatives • Community outreach to owners and operators regarding green alternative practices	South Coast AQMD CSC	• Number of Rule 1102 and Rule 1421 inspections • Provide list of incentive opportunities to support transition to green alternatives, if incentive opportunities are identified • Number of outreach materials distributed to owners and operators	2023	2nd quarter, 2027

1-238a

Commented [9]: rule amendment to ensure permitting process include BACT - Professional Wet Cleaning, CO2

Commented [10R9]: Research Memorandum included on how Professional Wet Cleaning meets all SCAQMD criteria for BACT and should be included and enforced through the permitting process for new dry cleaners permits.

1-238c

Commented [11]: Maybe also number of owners and operators who commit to transitioning to green alternatives or provide feedback on support needed to transition to green alternatives

Commented [12R11]: to report on efficacy of the actions

D: Agency Referrals	Refer to appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD's jurisdiction (e.g., Local land-use agencies, California Division of Occupational Safety and Health (Cal/OSHA), Certified Unified Program Agencies (CUPA), and public health departments) -work with OSHA to uplift incentives/operations/and equipment best practices that can protect workers and the community leveraging support from the workforce	South Coast AQMD	Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC	2nd quarter, 2022	2nd quarter, 2027
E: F.I.N.D. Tool and Filing Complaints	Conduct community outreach on F.I.N.D. tool including training on how to use the F.I.N.D. tool to search for information about South Coast AQMD-regulated facilities (e.g., facility details, equipment, permits, compliance history, etc.) and on filing air quality complaints by phone, web, or mobile application to the community	South Coast AQMD	• Conduct one F.I.N.D. outreach session to the community • Create training materials for F.I.N.D. to be published on the South Coast AQMD website	4th quarter, 2022	2nd quarter, 2027

1-239

1-240

Commented [13]: this tools is not user friendly and inaccessible, can this tool be improved?

1-241

Commented [14]: maybe quarterly/ yearly meetings to go over enforcement data with CSC

Table 5d-1: Actions to Reduce Emissions from and Exposure to General Industrial Facilities

Goal	Action	Responsible Entity(ies)	Matic(s)	Timeline	
				Start	Complete
C: Dry Cleaners	Set acceptable emissions from non-	South Coast AQMD	• Modify BACT (Best Available Control Technology) for non-perc solvent dry clean machines using		

1-242a

1-242b

1-242a cont.	• perc solvent-based dry clean systems regulated by Rule 1102 to zero based on viability of zero-emission alternatives.	CSC	1-242b cont.	professional wet cleaning, setting the acceptable VOC emissions at zero	3rd quarter 2022	4th quarter 2022
1-242c	• Phase out existing non-perc dry clean solvent machines after useful life and remove regulatory exemptions for non-perc dry clean solvent machines		1-242d	• Amend Rule 1102 to eliminated Rule 102 Group II exemption [by striking (b) 13 and (h) II] and phase out non-perc dry clean machines after fifteen years for the date of installation		
1-242e	• Create incentive opportunities to transition to professional wet cleaning (and other commercially viable zero-emission technologies when identified)		1-242f	• Provide list of incentive opportunities to support transition to professional wet cleaning, (and other commercially viable zero-emission technology when identified)	3rd quarter 2022	3rd quarter 2023
1-242j	• Community outreach to owners and operators regarding regulatory changes, incentives for zero-emissions technologies, and		1-242g	• Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102 permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of new BACT classification for non-perc solvents machines	3rd quarter 2022	2027 (note: assess need after 5 years)
			1-242h	• Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102 permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of Rule 1102 rule change		
			1-242i	• Support creating professional wet cleaning demonstration programs to jump start transition to zero emission professional apparel cleaning alternatives.		
			1-242k	• Number of outreach materials distributed to owners and operators be published on the website concerning new BACT, changes in Rule 1102,	4th quarter 2022	
			1-242L			

1-242j cont.	demonstration workshops on professional wet cleaning (and other commercially viable zero-emission technology when identified)		1-242k cont.	availability of incentives, and ongoing demo workshops on zero-emission technologies	1-242L cont.	3rd quarter 2023
						3rd quarter 2022
						4th quarter 2022
						2027 (Note assess need for demo program after five years)
						2027 (Note assess need if demo program extended

Chapter 5e: Metal Processing Facilities

Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC expressed concerns about health effects from emissions of criteria air pollutants, toxic air contaminants, and strong odors from metals facilities. The CSC is concerned with metal recyclers and metal scrap yards near sensitive receptors, such as Atlas Metals. Lead, hexavalent chromium, nickel, arsenic are metal toxic air contaminants; a toxic air contaminant is defined as an air pollutant which may cause or contribute to increase the rate of premature death or serious illness and may pose a potential risk to human health.[1]

Regulatory Background

1-243 There are approximately 69 metal processing facilities that are permitted with South Coast Air Quality Management District (South Coast AQMD) within the SLA community boundary.

Commented [1]: can be a map

These metal processing facilities conduct various operations, including melting, plating, finishing, machining, and grinding. Most metal recyclers and metal scrap yards do not have equipment subject to South Coast AQMD permits but could still be subject to some South

1-244 Coast AQMD rules such as Rules 403[2] and 1466.[3] These facilities may be the source of public complaints even though they do not have active permits; when such complaints are received, these locations will be investigated.

Commented [2]: further explain each rule

California Air Resources Board (CARB) identifies and controls toxic air contaminants from a multitude of sources, informs the public of significant toxic exposures, and provides ways to reduce risks from these exposures through its Air Toxics Program. South Coast AQMD, as well as other air agencies in California, rely on the state's Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants, their health effects, and the methodology to estimate the health risks from air toxic metal exposure. South

[1] California Health and Safety Code, Section 39655

[2] South Coast AQMD, Rule 403 – Fugitive Dust, http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf

[3] South Coast AQMD, Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

1-245 Coast AQMD regulates toxic air contaminants from stationary sources through several rules, including but not limited to, Rules 1401,[4] 1402,[5] 1420,[6] 1426,[7] 1430,[8] and 1469.[9] CARB has the authority to develop rules or regulations to control toxic air contaminants they identify. For example, after hexavalent chromium was identified as a toxic air contaminant,[10] CARB developed the Airborne Toxic Control Measure (ATCM) for Chromium Plating and Chromic Acid Anodizing Facilities,[11] which was adopted to reduce hexavalent chromium emissions from decorative and hard chrome plating facilities and chromic acid anodizing operations. CARB is developing an update to its Air Toxics Control Measure (ATCM), which is tentatively scheduled for approval at its Board Meeting in October 2022.

Commented [3]: further explanation of rules

Case Study on CMX - Lessons Learned informing CERP Actions

CMX optimizations to media-specific regulatory challenges have created positive environmental health benefits to other environmental media in general and air quality in particular that will be further considered for metal facility CERP actions.

1-246
- Storm Water Permitting – CMX developed an innovative two-step engineered approach: (1) Installation of water infiltration/aquifer recharge system channeling rainwater from roof drains and foundation challenges to a sump fed to a retention talk, into a infiltration chambers, fed to the soil to recharge the aquifer, and (2) Purchase and operations of ride-along mobile wet sweeper to minimize metal particle accumulation. This pollution prevention approach towards eliminating toxic metal particulates at the source and a sustainability approach of turning an environmental problem (e.g. toxic storm water discharge) into an environmental resource (i.e. recharging the aquifer with potable water via infiltration) – are identified as best practices for other metal industrial sites in the region.

[4] South Coast AQMD, Rule 1401 – New Source Review of Toxic Air Contaminants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[5] South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf
[6] South Coast AQMD, Rule 1420 – Emissions Standard for Lead, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1426.pdf
[7] South Coast AQMD, Rule 1426 – Emissions from Metal Finishing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1426.pdf
[8] South Coast AQMD, Rule 1430 – Control of Emissions from Metal Grinding Operations at Metal Forging Facilities, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1430.pdf
[9] South Coast AQMD, Rule 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf
[10] Hexavalent chromium was identified as an air toxic contaminant in 1987 (https://oehha.ca.gov/chemicals/chromium-hexavalent)
[11] For more information regarding CARB's current amendments to this ATCM, please visit https://ww2.arb.ca.gov/our-work/programs/air-toxics-program/chrome-plating-atcm/chrome-plating-meetings-workshops

- Wet Sweeping – Integration of wet sweeping into daily operations at CMX, in which all operational surfaces are swept three times each operational day, created three multi-media benefits – minimized metal particulate discharge into the storm water infiltration system, minimized occupational exposure of metal particulates to CMX employees, and minimizing release of metal particulates to the ambient air reducing potential exposure children and adults living, working, or attending school to the community adjustment to facility.

SCAQMD Rules Applicable to CMX: The list of specific SCAQMD Rules applicable to CMX are as follows:

1-246 cont.

- Rule 1407: CONTROL OF EMISSIONS OF ARSENIC, CADMIUM, AND NICKEL FROM NON-CHROMIUM METAL MELTING OPERATIONS
- Rule 1420: EMISSIONS STANDARD FOR LEAD
- Rule 1401: NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS.
    - Applicable when CMX is adding a new process to their operations.

***Integration of CMX Best Practices into SCAQMD Rules*:** While CMX was able to integrate operation of ride-along wet sweeper three times per operating day to reduce metal particle concentration to an optimally low level creating benefits to occupational exposure, storm water discharge, and ambient air, a review of the two SCAQMD rules (i.e. Rule 1407 and Rule 1420)

Actions to Reduce Emissions or Exposure

In the process of developing this CERP, CSC members requested a phase out of the use of hexavalent chromium and requirements to report emissions for metals facilities not subject to South Coast AQMD's Annual Emissions Reporting (AER) program[12] or Rule 1469.

[12] The Annual Emissions Reporting (AER) program requires facilities to report their emissions if they emit at least four tons of either sulfur oxides (Sox), volatile organic compounds (VOCs), nitrogen oxides (NOx), particulate matter (PM), or emissions of 100 tons per year or more of carbon monoxide (CO) (https://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting). Facilities subject to the AB 2588 Toxic Hot Spots Program also report more detailed toxics emissions inventories every four years (http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588). CARB's new CTR regulation will require many additional metals facilities to begin reporting emissions to South Coast AQMD's AER program, phasing in from 2023 through 2029 (https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting)

Community members requested buffer zones to be established near sensitive receptors, installation of enclosures and engineering controls, and outreach to the community to inform them of best management practices. Additionally, the CSC requested more information related to community-identified metals facilities and information on applicable rules, compliance history, and air monitoring data. The CSC also requested outreach efforts to local business owners and to provide information on applicable rules and regulations, South Coast AQMD's permitting process, and the South Coast AQMD Small Business Assistance program.

1-247 The CSC requested the following goals for metal processing facilities in SLA.

A. Inform the CSC of CARB's Criteria Pollutant and Toxics Emissions Reporting (CTR) process and CARB's Chrome Plating ATCM amendment adoption.
B. Identify permitted metal processing facilities and inform the community of applicable rules and regulations, compliance history, and available data as they relate to metal processing facilities in the community.
C. Identify emissions and exposure reduction measures and strategies for metal processing facilities.
1-248 D. Conduct air measurements surveys to identify facilities with potential elevated emissions and to characterize these emissions.
E. Inform the CSC of metals emissions data, criteria pollutants, and toxic air contaminants that may be found in the community (e.g., hexavalent chromium, lead, zinc, nitrogen oxides).
F. Inform metal processing facilities of best practices and applicable rules and regulations, and provide information on South Coast AQMD's Small Business Assistance program.[13]
G. Reduce fugitive metal emissions from metal recycling facilities.
H. Encourage partnerships between communities, businesses, and SCAQMD to incorporate best practices
1-249 I. Require and enforce technology transfer of best practices at metal facilities including mobile metals sweepers, workplace enclosures, and air monitoring
J. Create incentives for businesses to incorporate best practices

Commented [4]: goals should reflect recommendations made by CMX pilot project, to reduce emissions as presented to the CSC during the October 7, 2022 CSC meeting - in red below

Commented [5R4]: https://drive.google.com/file/d/1_1fOfey1OC6MXMspb-Mclomx_FDrlXVj/view

Commented [6]: is this just air monitoring?

Commented [7R6]: SCAQMD has huge investments in air monitoring technology - can an action be establish an air monitoring library to lend monitors to the community and provide staff support as needed.

The CSC developed the following CERP actions to address community concerns regarding the seven CERP goals. **Table 5e-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from metal processing facilities in SLA.

[13] South Coast AQMD, Small Business Assistance, http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance

Table 5e-1: Actions to Reduce Emissions from and Exposure to Metal Processing Facilities

Goals:	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
A: CARB Regulations	• Conduct a community workshop on the Criteria Pollutant and Toxics Emissions Reporting (CTR) process and share the data that has been collected from facilities in the community • Provide information regarding CARB Chrome Plating ATCM amendments	CARB South Coast AQMD	• Delivery of CTR Workshop • Number of updates to the CSC on ATCM amendments	2023	2024
B: Identify Metals Facilities	• Identify all permitted metals facilities within the SLA community boundary • Provide a list of South Coast AQMD rules applicable to the metals facilities identified • Provide three (3) year compliance history of the facilities identified • Summarize available emissions and air monitoring data collected at or near facilities	South Coast AQMD	• Provide list of permitted metals facilities • Provide applicable rules list for identified facilities • Provide compliance history for identified facilities • Provide emissions and air monitoring data, if available, for identified facilities	2023	2023
1-250 **C: Identify Strategies**	• Identify and prioritize air quality concerns related to sources of metal emissions	South Coast AQMD	• Provide list of prioritized concerns related to sources of metal emissions	2023	2nd quarter, 2027

Commented [8]: integrate hex chrome plating rule - enforce

	• Identify potential strategies and approaches to address the concerns at prioritized locations		• Provide strategies list, if applicable		
1-251	• Integrate new rulemaking on Hexavalent chromium to evaluation of current rules and applicability to South LA metal facilities				
1-252	• Integration of ride-along wet sweeper operations as a best practice into two SCAQMD rules -- Rule 1407 and Rule 1420.				
1-253	• *Integration of CMX Best Practices into SCAQMD Rules*: While CMX was able to integrate operation of ride-along wet sweeper three times per operating day to reduce metal particle concentration to an optimally low level creating benefits to occupational exposure, storm water discharge, and ambient air, a review of the two SCAQMD rules (i.e. Rule 1407 and Rule 1420)				
1-254	• Encourage partnerships between communities, businesses, and SCAQMD to incorporate best				

Commented [9]: This should be added, as a new rule or amendments of rules 1407 and 1420 to add best practices that can reduce emissions including integration of: 1) ride along wet sweeper, 2) stacks equipment to trap emissions on site, and 3)installation of monitors through facilities

1-254 cont.	practices including hosting business workshops and training on BACT. • Require and enforce technology transfer of best practices at metal facilities including mobile metals sweepers, workplace enclosures, and air monitoring installations at facilities. • Create incentives for businesses to incorporate best practices				
D: Air Measurement Survey	Conduct initial air measurement surveys near facilities of concern to identify and characterize any potential emissions	South Coast AQMD	• Conduct air measurements survey • Provide updates to the CSC	2nd quarter, 2022	2nd quarter, 2027
E: Emissions Data	Provide informational handout or presentation and an overview on criteria pollutants and toxics that may be found in the community (e.g., hexavalent chromium, lead, zinc, nitrogen oxides)	South Coast AQMD	Number of handouts distributed and/or delivery of presentation	2023	2025
F: Outreach to Owners and Operators	Conduct targeted outreach to metals facility owners and operators in the community, including providing information on best practices, South Coast AQMD's Small Business Assistance Program, permitting process, and applicable rules and	South Coast AQMD CARB	Number of outreach events or materials distributed to metals facilities	2023	2025

1-255
1-256
1-257
1-258
1-259

Commented [10]: led monitoring

Commented [11]: add this o general industrial facilities - this is needed information to confirm that emissions happening and to identify strategies to reduce them

Commented [12]: work with the CSC to develop good neighbor policies for metal facilities

	regulations – with a focus on new rule requirements from CARB and South Coast AQMD				
G: Metal Recycling Facilities	Initiate rule development process to address housekeeping and best management practices at metal recycling facilities	South Coast AQMD	Number of updates to the CSC on rule development efforts	2023	2026

1-260 **Commented [14]:** Maybe also assessment from the CSC on the efficacy of the rule being developed?

1-261 **Commented [13]:** amend rules to include best practices as BACT for permitting process

Chapter 5f: Oil and Gas Industry

1-262 ## Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC expressed concerns about emissions resulting from oil and gas operations conducted at drill sites and oil wells. In particular, the CSC has expressed concerns due to potential adverse health impacts associated with the proximity of these sites to residential areas. 1-263 The CSC also identified three oil and gas facilities (i.e., Jefferson, Murphy, AllenCo Energy Inc, and The Inglewood Oil Fields) where they believe there is limited transparency of monitoring data and enforcement activity findings, such as Notices of Violations (NOVs). Community residents also expressed concerns about the lack of noticing and reporting for acidizing injection wells and all the chemicals used on site which are regulated by Senate Bill –4.[1]

Commented [1]: the community also expressed desire to include the Inglewood oil fields - Martha

Commented [2]: include a map

Regulatory Background

The oil and gas industry has existed in Southern California for over a hundred years. This industry, which includes oil wells, oil drilling, pipeline transfer stations, and oil and gas production fields, has hundreds of facilities that are subject to requirements set forth by city agencies, local air districts, and state agencies (e.g., California Air Resources Board (CARB) and the California Geologic Energy Management Division (CalGEM)).

1-264 South Coast AQMD has specific regulations for oil wells, including the Rule 1148.1,[2] Rule 1148.2,[3] and other rules that reduce emissions of volatile organic compounds (VOCs)[4,5] from oil and gas operations. CARB has also adopted an Oil and Gas Regulation[6] to reduce methane emissions from oil and gas production, processing, and storage. Other agencies with authority over oil and gas production

Commented [3]: explain separately these rules

[1] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB4
[2] South Coast AQMD, Rule 1148.1 – Oil and Gas Production Wells, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-1.pdf
[3] South Coast AQMD, Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf
[4] South Coast AQMD, Rule 1173 - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1173.pdf
[5] South Coast AQMD, Rule 1176 – VOC Emissions from Wastewater Systems, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1176.pdf
[6] CARB, Oil and Gas Regulation, https://www.arb.ca.gov/regact/2016/oilandgas2016/oilandgas2016.htm

have been directed to draft rules or ordinances to regulate oil and gas production operations to address public health impacts. In 2019, CalGEM was directed by Governor Gavin Newson to develop a public health rule to update public health and safety protections for communities near oil and gas production operations.[7] In 2020, the Los Angeles County Department of Regional Planning began developing an oil well ordinance to update permit requirements and development operating standards for existing and new oil wells and accessory facilities in unincorporated Los Angeles County.[8] In 2022, the Los Angeles City Council passed a motion to recommend mayoral approval to require an ordinance be developed to prohibit new oil and gas extraction, make extraction activities a nonconforming use in all zones, ensure plugging and abandonment of wells, and conduct comprehensive site remediation.[9]

Actions to Reduce Emissions or Exposure

During development of this CERP, the CSC expressed a desire to prioritize air measurements at specific oil drilling sites and identify areas of concern to conduct inspections in conjunction with CARB. CSC members requested transparency with monitoring and enforcement data, including periodic summaries of inspection findings including enforcement actions taken and referrals made to appropriate agencies if findings are outside South Coast AQMD's authority. The CSC has requested that regulatory agencies accept data provided by community-based organizations into their findings when conducting enforcement actions. In addition to monitoring and enforcement, the CSC requested that the current applicability of the Rule 1148 series be assessed to include reducing emissions from on-site diesel engines, banning chemical odorants at drill sites, and removing exemptions for injection wells.

1-265 The CSC requested the following goals for oil and gas facilities in SLA.

A. Identify locations of concern, characterize emissions, and identify potential elevated emissions through air measurement surveys around oil drilling sites.

B. Determine which oil well sites and activities may require additional monitoring.

C. Make referrals from oil and gas inspections to appropriate agencies to ensure these facilities follow rules and regulations from other agencies, in particular those related to land-use, public health, and abandoned wells.

1-266 D. Prepare a report for CSC of all enforcement activities and findings and enforcement actions taken at oil and gas facilities, in particular those related to odors and fugitive emissions.

E. Reduce emissions and exposure to oil and gas operations through ~~potential~~ rule amendments to Rules 1148.1 and 1148.2.

Commented [4]: Disclose all chemical use on the sites indludng oderants - Martha

[7] CalGEM Public Health Rulemaking, https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx

[8] Los Angeles County Department of Regional Planning, Draft Oil Well Ordinance, https://planning.lacounty.gov/oilwell

[9] Los Angeles City Council File 17-0447, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0447

1-266 cont.

F. Support Participatory Action Research and community data collection on emissions

G. Improve accessibility and usability of the F.I.N.D. tool and how to file air quality complaints.

H. Inform the CSC of enforcement findings, specifically related to CARB regulations.

The CSC developed the following CERP actions to address community concerns regarding the nine CERP goals. **Table 5f-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emission or exposure reductions from the oil and gas industry in SLA.

Table 5f-1: Actions to Reduce Emissions from and Exposure to Oil and Gas Industry

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
A: Air Measurement Surveys	• Prioritize locations for community air monitoring • Conduct air measurement surveys around oil drilling sites to identify and characterize any potential emissions • Air monitoring for oil and gas should be readily available and with the correct monitor systems to monitor the right pollutants. • Complaints response system should improve to ensure emergencies are addressed promptly - such as fugitive emissions	South Coast AQMD	• Provide list of prioritized locations for monitoring • Number of air measurement surveys	2nd quarter, 2022	4th quarter, 2026

1-267

1-268

1-269	**B: Monitoring**	Collaborate with appropriate agencies and the CSC to determine if additional air monitoring is needed during specific well activities or under certain conditions -create a low cost sensor unit available for community science, that can be shared with CSC/south la community members, collaborate with SCAQMD low cost sensor department and the community to move towards utilizing and sharing and making these data sets more enforceable and validated - with http://www.aqmd.gov/aq-spec/sensors	South Coast AQMD	• Number of meetings with appropriate agencies • Conduct air measurements during specific well activities, if necessary	2nd quarter, 2022	1st quarter, 2025
	C: Agency Referrals	Refer oil and gas facilities to appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD's jurisdiction (e.g., local land-use agencies, CalGEM, and public health departments)	South Coast AQMD	Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC	2nd quarter, 2022	2nd quarter, 2027
1-270	**D: Enforcement Updates**	Provide periodic summaries of findings from enforcement activities, such as whether odors or emissions were confirmed or verified with complainants and at a specific site or source and any enforcement action taken -review summaries with the CSC quarterly to review NOC/s NOVS and set metrics and enforcement data gaps.	South Coast AQMD	Number of enforcement updates to the CSC	3rd quarter, 2022	2nd quarter, 2027

Commented [5]: with http://www.aqmd.gov/aq-spec/sensors

1-271		Ensure that no Public Records Requests are not required to the CSC and add summaries to the South LA AB617 website quarterly for easier access and transparency				
1-272	**E: Rule Amendment Feasibility**	-Initiate process to amend rules 1148.1 and 1148.2 to include injections well, ban chemical odorants in acid work, and add mandatory public notices for when acid works are done. ~~Explore expanding Rule 1148.1 and 1148.2 to include~~ • Acid work at injection wells • Notification of workover rig operations • Notification of and requirements for using odorants and chemicals used onsite • Notification of modifications to any previously noticed work	South Coast AQMD	• Number of Rule Working Group meetings held, if necessary • Update to CSC on rule development efforts	2nd quarter, 2022	2nd quarter, 2027
1-273	**F: Support Community ~~Citizen~~ Scientists**	Identify opportunities to support citizen scientists to conduct community air monitoring -promote collaboration with other agencies to do surveys on Health impacts with community scientists that can support data collection. Ensure that this accepting data collected by the community in the regulatory landscape,	South Coast AQMD	Number of activities with the citizen scientists to collaborate	2nd quarter, 2023	2nd quarter, 2027
1-274						

Commented [6]: NOT explore - AMED these rules. Initiate rule amendment process as language extracted from the Wilmington CERP https://www.baaqmd.gov/~/media/files/ab617-community-health/west-oakland/100219-files/final-plan-vol-1-100219-pdf.pdf?la=en

1-274 cont. 1-275 1-276	community science data and findings should be equally validated as regulatory agencies. -CAQMD/CBO's co-develop a pilot community science program - training that can create a team of community trusted leaders -including incentives for community engagement. -evaluate paths for research from the community science to be integrated in the CERP implementation metrics.				
G: F.I.N.D. Tool and Filing Complaints	Conduct community outreach on F.I.N.D. tool including training on how to use the F.I.N.D. tool to search for information about South Coast AQMD-regulated oil and gas facilities (e.g., facility details, equipment, permits, compliance history, etc.) and on filing air quality complaints by phone, web, or mobile application to the community	South Coast AQMD	• Conduct one F.I.N.D. outreach session for the community • Create training materials for FIND to be published on the South Coast AQMD website	4th quarter, 2022	2nd quarter, 2027
H: CARB Regulations	CARB to collaborate with South Coast AQMD to conduct inspections of all CSC-identified oil and gas facilities of concern regarding CARB and South Coast AQMD rules (including Portable Equipment Registration Program	CARB South Coast AQMD	• Number of facilities inspected • Number of updates regarding findings	3rd quarter, 2022	2nd quarter, 2027

	(PERP), [10] mobile source regulations, and Oil and Gas Regulation[11])				
1-277 1-278	**I: Other Governmental Agency Projects**	Identify opportunities for other agencies to provide information regarding their authority and projects (e.g., future regulations or ordinances) related to the oil and gas industry -identify relevant County and City departments working on the initial assessments/actions/plans for prohibiting new oil wells/declaring non conforming land use to provide updates to CSC -in the meantime of LA county/city ordinance phase out oil drilling ordinance implementation, high priority oil wells in South LA create a funding support/community project or program for remaining operating/non operating oil wells implement best practices and emission reduction technologies such as electrification of their operations, and BACT for clean ups.	South Coast AQMD	Number of presentations from other agencies to the CSC	3rd quarter, 2022	2nd quarter, 2027

[10] CARB, Portable Equipment Registration Program, https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
[11] CARB, Oil and Gas Regulation, https://ww2.arb.ca.gov/resources/documents/oil-and-gas-regulation

Chapter 6: Community Air Monitoring Plan (CAMP) Summary

1-279

1-280 The Community Air Monitoring Plan (CAMP) for the South Los Angeles (SLA) community describes the strategies and objectives for monitoring air pollution in the community and has been developed through collaboration between the Community Steering Committee (CSC), the CSC co-leads, and South Coast

1-281 AQMD. To support this collaboration and most effectively leverage the knowledge and experience of community members, a Monitoring Working Team was also formed to inform and direct the CAMP and provide guidance throughout its implementation. The CSC and Monitoring Working Team identified the

1-282 air quality priorities (Mobile Sources, Auto Body Shops, General Industrial Facilities, Metal Processing Facilities, Oil and Gas Industry) and the air monitoring actions designed to address them, as outlined in the Community Emissions Reduction Plan (CERP). Although the CERP and CAMP are separate documents,

1-283 they work together to help achieve the emissions and exposure reduction actions created to improve local air quality in SLA.

Air monitoring plays an important role in enhancing our understanding of air pollution in SLA and in other AB 617 communities, and can provide valuable information about emission sources, types of air pollutants, and their potential impacts on the community. The air monitoring strategies designed to evaluate the impact of the specific air quality priorities identified by the CSC are included in the CERP actions to address Auto Body Shops (Chapter 5c), General Industrial Facilities (Chapter 5d), Metal Processing Facilities (Chapter 5e), and the Oil and Gas Industry (Chapter 5f).

To meet the specific air monitoring actions for SLA, it is critical to develop a sound air monitoring approach and to use the appropriate monitoring methods and equipment. The SLA community has expressed the desire to create more community driven air data collection and monotoring. This community covers a large, densely populated geographic area that is affected by a wide variety of air pollution sources, making it necessary to use multiple air monitoring strategies including mobile and fixed (stationary) monitoring, which can be supplemented by the use of air quality sensors. Mobile air monitoring is typically conducted using real-time instruments for wide-area measurement surveys, to help identify locations with elevated levels of specific air pollutants, and provide information about air pollution levels near a potential source. Fixed air monitoring is conducted by placing one or more measurement instruments at strategic locations to characterize emissions over time, provide real- or near real-time concentration readings of air pollutants, and to satisfy other air monitoring objectives. Additionally, air quality sensors can be deployed to supplement the overall monitoring efforts by expanding the geographical coverage of the measurements and providing real-time air pollution information for certain pollutants, such as particulate matter (PM), nitrogen dioxide (NO_2), and ozone (O_3). A detailed description of the monitoring methods and technologies that could be deployed in SLA and the air pollutants to be measured in this community is provided in the CAMP. Also described in the CAMP are the methods by which air monitoring results will be communicated to the CSC, as well as how the data will be made available to the public. Overall, community air monitoring will contribute to satisfy the recommendations provided in CARB's "Community Air Protection Blueprint"[1] and will support the implementation of the CERP in SLA.

[1] CARB, Community Air Protection Blueprint, https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/community-air-protection-blueprint

Commented [1]: permanent monitoring at some facilities of concern that have good neighborhood policies.

Commented [2]: quarterly meetings to create air quality monitoring benchmarks and metrics to evaluate actions implementations efficacy

Commented [3R2]: Develop a data portal to provide updates for community/ develop training so community members now how to access and use the information

Commented [4R2]: work with CARB to develop air monitoring lending program
community air monitoring trainings - at the air monitoring devices.

Commented [5R2]: air monitoring division works with CSC members on quarterly monitoring data debriefs, and explore how to make purple air monitoring data more enforceable

California Metal X (CMX) Case Study

Introduction: PSR-LA introduced to CMX in 2011 has part of a Los Angeles Trade Tech project of Green Manufacturing. Since 2011, PSR-LA and CMX participated on an advisory board of a five-year UCLA lifecycle project evaluating the viability of lead-free alloys for potable water supply components. Further, in 2016, CMX participated as a site for a Just Transition tour organized by PSR-LA of facilities in Los Angeles committed to taking actions to support environmental justice. Because CMX is located in the PSR-LA's South/Southeast Los Angeles AB617 catchment and because CMX is metals processing operation, they were selected as a metal's industry case study for this project. In interview with the owners of CMX as well as the environmental compliance consulting firm hired by CMX provided details for this case study.

Location: CMX is located at 366 E 58th St, Los Angeles, CA 90011.

NAICS: 423930 - Recyclable Material Merchant Wholesalers.

Business Description: Copper alloy manufacturer.

Ownership Structure: CMX is sole proprietorship owned by Tim Strelitz and Karen Strelitz.

Business Operations: Buys post-consumer scrap material, cleans and processes purchased post-consumer scrap material, melts cleaned post-consumer scrap material into copper-based alloy ingots sold to copper-based component manufacturers.

History: In 1981, CMX purchased the property at 366 E 58th St, Los Angeles and has continuous operated the site as a copper alloy manufacturer over the last 39 years. The facility is located in an industrial/commercial zone along Slauson Avenue. When CMX first began operating at this site in 1981, no schools were located in the surrounding community. Since then, three grade school have been built within one mile of CMX: Estrella Elementary School, Los Angeles Academy Middle School, and Dr. Maya Angelou Community High School. In addition, the density of residential units has also increased in the adjacent community.

CMX Proactive Modifications to Optimize Environmental Health Performance: In order to successfully compete as a copper-based alloy manufacturer in a highly saturated and increasingly globalized sector, CMX has created a culture of innovation in which operations and equipment are continuously modified to increase efficiency and effectiveness of the plant. This culture of innovation has been applied to compliance with environmental health regulations which have increased in complexity and stringency over the 39 years of CMX operations at this facility. With respect to environmental compliance, the philosophy of CMX has been to "get out front" of regulations in order to both fulfill the social responsibility of the firm by minimizing the firm's environmental health footprint as well as minimize the

risk of disruption in business operations associated with regulatory non-compliance. CMX optimizations to media-specific regulatory challenges has created positive environmental health benefits to other environmental media in general and air quality in particular.

- Storm Water Permitting – In response pending storm water permit requirements in California targeted to the metals manufacturing sector and the specific concern with run-off discharge of toxic metals particulate waste from these facilities to the storm water system, CMX developed an innovative two-step engineered approach: (1) Installation of water infiltration/aquifer recharge system channeling rain water from roof drains and foundation challenges to a sump fed to a retention talk, into a infiltration chambers, fed to the soil to recharge the aquifer, and (2) Purchase and operations of ride-along mobile wet sweeper to minimize metal particle accumulation (see below).

  Not only did these CMX actions fulfill new storm water permit requirements, the innovative CMX system – taking a pollution prevention approach towards eliminating toxic metal particulates at the source and sustainability approach of turning an environmental problem (e.g. toxic storm water discharge) into an environmental resource (i.e. recharging the aquifer with potable water via infiltration) – was view by the storm water regulatory agency as well as the environmental NGO focused on problems with storm water toxicity as best practices for other industrial sites in the region.

- Wet Sweeping – Integration of wet sweeping into daily operations as CMX, in which all operational surfaces are swept three times each operational day, created three multi-media benefits – minimized metal particulate discharge into the storm water infiltration system, minimized occupational exposure of metal particulates to CMX employees, and minimizing release of metal particulates to the ambient air reducing potential exposure children and adults living, working, or attending school to the community adjustment to facility.

- Lead-Free Brass Alloys – In 2006, California enacted a new law, AB 1953, which phased out lead-bearing brass components in the potable water supply system, with the intent to eliminate the problem of lead leaching into drinking water. At the time this law was create, a wide range of potable water supply components were made from lead-brass alloys (e.g. water meters, fire hydrants, back flow preventors, etc.). While many firms in the potable water metal manufacturer supply chain opposed enacting AB1953, CMX was the first firm to support this legislation. CMX advocacy spearheading a change in the metal manufacturing sector, with most firms coming around to support this bill phasing out of lead-brass. This industry support was critical to bill becoming law. In 2011, the federal legislation was enacted based on AB1953.

  The practical consequence for CMX was that beginning in 2008, they discontinued manufacturing the two main lead brass alloys previously used by potable water supply component manufacturers. This switch as CMX to manufacturing lead-free brass in turn resulted in a reduction in the generation of lead particles reducing lead concentration in storm water runoff, reducing occupational exposure to lead particles, and reducing emissions of lead particles to the ambient air.

CMX Environmental Compliance Infrastructure: CMX works with Keramida, Inc. to facilitate compliance with environmental health regulations including air quality permits from SCAQMD, storm water permits for California, and worker health and safety permits from OSHA/Cal-OSHA. Keramida markets is an WBE-certified (women-owned business enterprise) EHS and sustainability consulting firm. With respect to SCAQMD permitting, Keramida monitors data collected by CMX associated to assure specific reporting requirements and completes all reporting requirements to SCAQMD, including completing and submitting the SCAQMD Annual Emissions Report.

SCAQMD Permit: CMX's SCAQMD permit includes a number of pieces of equipment and operations associated with metal recycling at the facility – materials separation, materials cleaning, materials pelletizing, furnace operations, baghouse operations, and abrasive blasting. The equipment associated with the CMX SCAQMD Permit is listed on-line by SCAQMD in their FIND (Facility Information Detail) system (See Appendix A for the FIND list of regulated equipment at CMX)

SCAQMD Rules Applicable to CMX: The list of specific SCAQMD Rules applicable to CMX are as follows:

- Rule 1407: CONTROL OF EMISSIONS OF ARSENIC, CADMIUM, AND NICKEL FROM NON-CHROMIUM METAL MELTING OPERATIONS
- **Rule 1420:** EMISSIONS STANDARD FOR LEAD
- **Rule 1401: NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS.**
    - **Applicable when CMX is adding a new process to their operations.**

CMX Compliance with SCAQMD Permit

- January 2011-March 2020 – Based on the database provided by SCAQMD for this report of inspections in the South/Southeast Los Angeles catchment over the eight-and-a-quarter period, SCAQMD completed two inspections of CMX between January 2011 and March 2020 and neither inspection resulted in either a minor citation (i.e. Notice to Comply) nor a major violation (i.e. Notice of Violation). Of the 280 targeted facilities in this catchment, 61 were inspected twice, and of this group, less than half (44%) passed both inspections without a citation.

- History of any SCAQMD citations – The SCAQMD FIND database tracks facility inspection outcomes beginning in January 2003. Over this seventeen-and-a-half year period, only one inspection, on August 6, 2010 resulted in any citation, which was a minor Notice to Comply violation (See Appendix B). The details of the NC were found in a separate publicly available SCAQMD Notice to Comply Inquiry System (See Appendix C for details on this NC). The details of this NC were a request to submit records associated with the Rule 1420 compliance plan and the records on air flow to the baghouse associated with Rule 1407. The SCAQMD follow-up inspection two weeks later, on August 24, 2010, resulted in a status of "In Compliance." That is, CMX provided SCAQMD the records requested.

- Reliability of compliance after a violation – The history of violations at CMX described above shows one minor violation in 2010 over a seventeen-and-a-half year period, compliance after a

two-week reinspection, and two subsequent inspections with no violations. While it was not possible to track compliance after a violation for the data set provided by SCAQMD for all targeted facilities in the South/Southeast Los Angeles catchment, at least for CMX, this history shows repeated reliability of compliance after a violation.

Integration of CMX Best Practices into SCAQMD Rules: While CMX was able to integrate operation of ride-along wet sweeper three times per operating day to reduce metal particle concentration to an optimally low level creating benefits to occupational exposure, storm water discharge, and ambient air, a review of the two SCAQMD rules by which CMX is regulated (i.e. Rule 1407 and Rule 1420) shows that while wet cleaning methods are required for surface cleaning, facilities are required to clean floor surfaces once a week. SCAQMD should consider increasing the frequency of cleaning based on the best practices demonstrated by CMX.

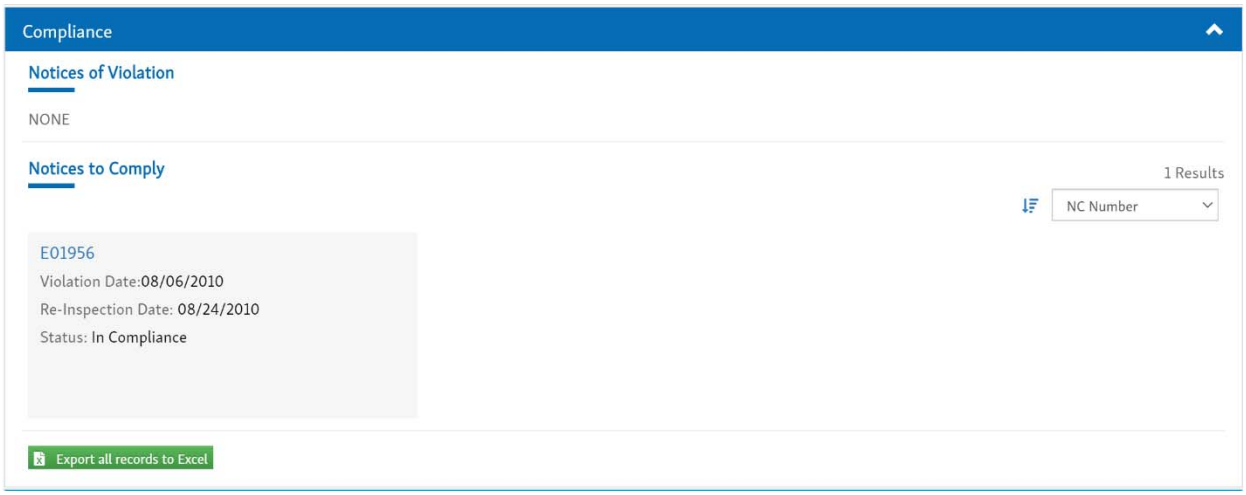
Appendix A

CMX List of Regulated Equipment in SCAQMD Permit (See https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=61681

Application Number	Permit Number	Issue Date	Permit Status	Equipment Description	Equipment Type	Application Date	Application Status
171477	D08108	5/30/1989	INACTIVE	DUST COLLECTOR CARTRIDGE TYPE	Control	6/22/1988	PERMIT TO OPERATE GRANTED
171478	D08109	5/30/1989	INACTIVE	MISC MATERIALS SIZE REDUCTION	Basic	6/22/1988	PERMIT TO OPERATE GRANTED
171479	D08110	5/30/1989	INACTIVE	MISCELLANEOUS MATERIALS PELLETIZING	Basic	6/22/1988	PERMIT TO OPERATE GRANTED
171480	D08111	5/30/1989	INACTIVE	MISCELLANEOUS MATERIALS PELLETIZING	Basic	6/22/1988	PERMIT TO OPERATE GRANTED
237600	D72301	4/12/1993	INACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	9/19/1990	PERMIT TO OPERATE GRANTED
255001	D72236	4/8/1993	INACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	8/12/1991	PERMIT TO OPERATE GRANTED
255052	D72237	4/8/1993	INACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	8/12/1991	PERMIT TO OPERATE GRANTED
267683	D69121	2/2/1993	INACTIVE	FURNACE ELECT IND & RES MISC METALS	Basic	5/13/1992	PERMIT TO OPERATE GRANTED
267684	D69122	2/2/1993	INACTIVE	FURNACE ELECT IND & RES MISC METALS	Basic	5/13/1982	PERMIT TO OPERATE GRANTED
267685	D69123	2/2/1993	INACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	5/13/1992	PERMIT TO OPERATE GRANTED
279697	D72249	4/8/1993	INACTIVE	AGGREGATE CONVEYING	Basic	3/21/1993	PERMIT TO OPERATE GRANTED
279698	D72250	4/8/1993	INACTIVE	AGGREGATE CONVEYING	Basic	3/24/1993	PERMIT TO OPERATE GRANTED
283217				PLAN, RULE 1420 LEAD COMPLIANCE	Basic	7/14/1993	APPROVED PLAN, BILLABLE
300364				Plan, Non-Ferrous Metal Melting Control	Basic	1/11/1995	BANKING/ PLAN GRANTED, NON BILLABLE
301434				FURNACE REVERB (ROTARY) BRASS-YELLOW	Basic	2/28/1995	APPLICATION CANCELLED, KEEP FILING FEES
301435				BAGHOUSE, HOT	Control	2/28/1995	APPLICATION CANCELLED, KEEP ALL FEES
301436				BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	2/28/1995	APPLICATION CANCELLED, KEEP ALL FEES
315411	F2541	9/9/1996	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	4/2/1996	PERMIT TO OPERATE GRANTED
361007				Plan, Non-Ferrous Metal Melting Control	Basic	10/20/1999	APPLICATION CANCELLED, KEEP FILING FEES
361536	F46363	11/10/2001	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	10/20/1999	PERMIT TO OPERATE GRANTED
361916	F60820	5/20/2003	ACTIVE	CHIP DRYER	Basic	11/1/1999	PERMIT TO OPERATE GRANTED
361917				AFTERBURNER, DIRECT FLAME	Control	11/1/1999	APPLICATION CANCELLED, KEEP ALL FEES
366028	F43529	8/27/2001	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	2/10/2000	PERMIT TO OPERATE GRANTED

366029	F43528	8/27/2001	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	2/10/2000	PERMIT TO OPERATE GRANTED
366030	F43527	8/27/2001	INACTIVE	FURNACE OTHER MET OPS BRASS-YELLOW	Basic	2/10/2000	PERMIT TO OPERATE GRANTED
372759	F33517	9/1/2000	ACTIVE	ABRASIVE BLASTING (CABINET/MACHINE/ROOM)	Basic	8/1/2000	PERMIT TO OPERATE GRANTED
372760	F33522	9/5/2000	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	8/1/2000	PERMIT TO OPERATE GRANTED
398136	F51783	4/30/2002	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	2/28/2002	PERMIT TO OPERATE GRANTED
444460	F76373	6/29/2005	ACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	5/25/2005	PERMIT TO OPERATE GRANTED
444461	F76374	6/29/2005	ACTIVE	MISC MATERIALS CLEANING	Basic	5/25/2005	PERMIT TO OPERATE GRANTED
469479	F90946	7/3/2007	ACTIVE	MISC MATERIALS SEPARATION	Basic	5/17/2007	PERMIT TO OPERATE GRANTED
469481				MISCELLANEOUS MATERIALS PELLETIZING	Basic	5/17/2007	APPLICATION CANCELLED, KEEP FILING FEES
469482				MISCELLANEOUS MATERIALS PELLETIZING	Basic	5/17/2007	APPLICATION CANCELLED, KEEP FILING FEES
469483	F90947	7/3/2007	ACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	5/17/2007	PERMIT TO OPERATE GRANTED
565169	G31933	7/9/2014	INACTIVE	MISC MATERIALS SIZE CLASSIFICATION	Basic	6/11/2014	PERMIT TO OPERATE GRANTED
565170	G31934	7/9/2014	INACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	6/12/2014	PERMIT TO OPERATE GRANTED
565171	G31940	7/9/2014	ACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	6/12/2014	PERMIT TO OPERATE GRANTED
566236	G51888	4/21/2018	ACTIVE	FURNACE OTHER MET OPS BRASS-YELLOW	Basic	7/2/2014	PERMIT TO OPERATE GRANTED
580515	G40684	6/16/2016	ACTIVE	FURNACE ELECT IND & RES MISC METALS	Basic	12/16/2015	PERMIT TO OPERATE GRANTED
580516	G40685	6/16/2016	ACTIVE	FURNACE ELECT IND & RES MISC METALS	Basic	12/16/2015	PERMIT TO OPERATE GRANTED
580517				FURNACE OTHER MET OPS BRASS-YELLOW	Basic	12/16/2015	APPLICATION CANCELLED, KEEP ALL FEES
588664	G51890	4/21/2018	ACTIVE	MISC MATERIALS SIZE CLASSIFICATION	Basic	9/7/2016	PERMIT TO OPERATE GRANTED
588665	G51892	4/21/2018	ACTIVE	BAGHOUSE, AMBIENT TEMP (>500 SQ FT)	Control	9/7/2016	PERMIT TO OPERATE GRANTED
588666	G51889	4/21/2018	ACTIVE	MISC MATERIALS SIZE CLASSIFICATION	Basic	9/7/2016	PERMIT TO OPERATE GRANTED
588667	G51891	4/21/2018	ACTIVE	BAGHOUSE, AMBIENT TEMP (>100-500 SQ FT)	Control	9/7/2016	PERMIT TO OPERATE GRANTED
621578				MISC MATERIALS SIZE CLASSIFICATION	Basic	4/23/2020	APPLICATION READY FOR PRESCREENING

Appendix B


Compliance
Notices of Violation
NONE
Notices to Comply
1 Results
NC Number
E01956
Violation Date:08/06/2010
Re-Inspection Date: 08/24/2010
Status: In Compliance
Export all records to Excel

Appendix C

NOTICE TO COMPLY INQUIRY SYSTEM

Notice Detail

Notice Number	E01956	Violation Date	8/6/2010	Issue Date	8/10/2010

Facility ID	61681
Company Name	THE STRELITZ CO, INC,CALIFORNIA METAL- X
Address	366 E 58TH LOS ANGELES, CA 90011
Violation Description	SUBMIT PLANT LAYOUT INCLUDING PERMIT NUMBER UNDER WHAT ID FOR ENTIRE FACILITY. SUBMIT RECORDS OF HOUSEKEEPING & MAINTENANCE TO PROVE COMPLIANCE W/R1420 COMPLIANCE PLAN. SUBMIT RECORDS OF AIR FLOW TO BAGHOUSE TO SHOW COMPLIANCE W/R1407 COMPLIANCE PLAN
Equipment Description	CONDITIONS 2 TO 5. SUBMIT RECORD OF BATCH LOAD IN ANY ON 120 MP THROUGH COPPER WIRE RECYCLE SYSTEM (F90946)-CONDITION #4. SHOW PROOF OF ALL BAGHOUSE DISCHARGE ONLY INTO CLOSED CONTAINERS.
Status	In Compliance
Re-inspection Date	8/24/2010

Rule No.	Rule Description
1407	Control of Emissions or Arsenic, CD, and NI from Non-Ferrous Metal Melting Op
1420	Emissions Standard for Lead

March 17, 2022

From: Peter Sinsheimer, Technical Consultant to SCLA-PUSH

To: South Coast Air Quality Management District

Re: Comments on March 2022 Draft SLA CERP related to dry cleaning

My comments below are being made in my role as technical consultant to SCLA-PUSH's project focused on air quality.

By way of background, between 1994-1997, as a PhD student at UCLA, I served as a senior researcher associated on a SCAQMD/CARB/USEPA project focused on the potential viability of professional wet cleaning based on the evaluation of the first professional wet cleaner to operate in California. Between 2000-2004 I served as project director of the SCAQMD-funded project focused on converting the first set of perchloroethylene (perc) dry cleaners to convert to professional wet cleaning. Between 2005-2014 I served as director of the CARB-funded professional wet cleaning demonstration project. In addition, I served as the lead scientist on a utility-funded project – sponsored by SCE, SCGC, and LADWP, focusing on a comparative analysis of electricity and natural gas use of a range of professional apparel cleaning technologies.

In 2019, Physicians for Social Responsibility – Los Angeles, ask me to serve as technical consultant on their SCLA-PUSH project. As part of this project, I was asked to evaluate Best Available Control Technology associated with targeted sectors including professional apparel cleaning services. During Phase 1 of this project, I completed an analysis of SCAQMD criteria for BACT, evaluated evidence related to a range of professional apparel cleaning technologies related to each criteria, used this evidence to assess the extent to which each technology met each SCAQMD BACT criteria, and concluded that there was strong reliable evidence that both professional wet cleaning CO_2 dry cleaning met each SCAQMD criteria of BACT with professional wet cleaning being extremely cost-effective given that operating cost of this zero-emission technology was lower than no-perc dry cleaning technologies that SCAQMD regulated.

Based on this analysis, the SCLA-PUSH document entitled "Report on the First Phase of Air Quality Assessment in South Central Los Angeles, 2019-2020" listed professional wet cleaning and CO_2 dry cleaning as BACT for non-perc dry cleaning (see page 48). That said, due to page constraints of this report, the analysis I completed underlying this finding was not included. In consideration of the SLA CERP, I believe my 2019 analysis supporting this conclusion is important to provide.

Further, this analysis also recommended amending SCAQMD Rule 1102 eliminating the Rule 102 Group II exemption, including the exemption excludes siloxane-based solvent decamethylcyclopentasiloxane (or D5) from Rule 1102 regulation. Toxicity risk associated D5

has resulted in the European Union banning D5, including its use on dry cleaning. Further, the extremely high energy use associated with D5 dry cleaning compared to zero-emission professional wet cleaning and CO_2 dry cleaning further supports removing the Rule 102 Group II exemption to Rule 1102.

In additional, an amendment to SCAQMD Rule 1102 should be created phasing out non-perc dry cleaning machines regulated under this rule based on a fifteen (15) year life of this equipment. Since listing zero-emission professional wet cleaning and CO_2 dry cleaning would prohibit further permitting by SCAQMD on new non-perc dry cleaning machines, a phase out of existing non-perc dry cleaning machines regulated under Rule 1102 should be created based on the 15-year expected useful life of this equipment. This rule change is comparable to the CARB 2007 ruling phasing out perc dry cleaning based on a 15-year useful life of perc dry cleaning equipment. Phasing out existing non-perc dry cleaning machines is essential given that older machines are more prone to break down control systems, including break down in pollution control equipment resulting in greater emissions as well as break down fire suppression equipment for non-perc dry clean machines using combustible solvents. Most, if non all non-perc dry cleaning machines regulated under Rule 1102 use combustible solvents.

As non-perc dry cleaning machines regulated by SCAQMD Rule 1102 are being phased out, an early-adopter incentive program for dry cleaners switching to viable zero-emission alternatives should be created to jump start this transition. This early adopter incentive program should be coupled with a zero-emission technology demonstration program to further enhance this transition.

Beyond the community emissions reduction benefits created by transitioning from non-perc solvent-based dry cleaning technologies regulated by Rule 1102 to viable zero-emission professional wet cleaning and CO_2 dry cleaning, from the perspective of dry cleaners switching professional wet cleaning, reliable evidence demonstrates that they will experience greater profitability based on lower operating costs. From the perspective of SCAQMD, given that neither professional wet cleaning and CO_2 dry cleaning machines require SCAQMD permits, the benefits of phasing out non-perc dry cleaning regulated by Rule 1102 and transitional cleaners to zero-emission equipment not regulated by SCAQMD will demonstrate to the professional apparel cleaning community in particular and the broader business community in general that SCAQMD supports reduced regulatory oversight.

While the above serves as an overall summary of recommendations to the March 2022 draft SLA CERP, below I am providing the following. Appendix 1: A recent memo I sent to my PSR-LA colleagues, which included the complete 2019 analysis of BACT for non-perc dry cleaning equipment regulated under Rule 1102. Appendix 2: Track change recommendations to Table 5d-1 related to the SLA CERP for dry cleaning as support by my 2019 BACT analysis as well as the comments provided above.

Appendix 1

March 16, 2022 Memo to Physicians for Social Responsibility – Los Angeles on 2019 Analysis of Professional Wet Cleaning and CO_2 Dry Clean as BACT for Non-Perc Dry Cleaning Machines Regulated by SCAQMD Rule 1102

March 16, 2022

To: Paula Torrado, Marth Arguello – Physicians for Social Responsibility Los Angeles

From: Peter Sinsheimer – Green Analytics

Re: Professional wet cleaning as SCAQMD BACT for non-perc dry cleaning machines

As you know, the SCLA-Push document "Report on the First Phase of Air Quality Assessment in South Central Los Angeles, 2019-2020" identified dry cleaners as a targeted sector of high concern and classified zero-emission professional wet cleaning and CO_2 dry cleaning as best available control technology (BACT) for non-perchloroethylene (perc) dry cleaning solvent machines regulated by South Coast Air Quality Management District. As you requested, as a technical consultant on this First Phase work, I completed this analysis of BACT for non-perc dry cleaning. Below is the detailed analysis demonstrating that professional wet cleaning clearing meeting SCAQMD's criteria as BACT for non-perc dry cleaning.

1. INTRODUCTION

Within the SCAQMD, Regulation XIII requires BACT be used by facilities applying for permits for new sources, relocated sources, and modifications to existing sources that may result in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia. SCAQMD periodically updates their BACT Guidelines which establish both the procedures determining BACT as well as the actual BACT for commonly permitted equipment."[i] SCAQMD invites written comments about BACT Guidelines and written comments are evaluated by SCAQMD staff and included in the BACT Docket.[ii]

SCAQMD divides facilities into two BACT groups – major polluting facilities and non-major polluting facilities.[iii] The SCAQMD document *Best Available Control Technology Guidelines* developed different policies and procedures for major and non-major polluting facilities. For major sources, BACT uses a Lowest Achievable Emission Rate (LAER) standard, evaluating what is achievable in practice with little consideration of cost. For non-major sources BACT, or MSBACT, BACT is based on the most stringent standard considered to be cost-effective.

In the SCAQMD BACT Guidelines, two parts focused specifically on MSBACT. "Part C – Policy and Procedures for Non-Major Polluting Facilities" provides specific criteria for determining MSBACT for each regulated equipment type or emission limit. "Part D: BACT Guidelines for Non-Major Polluting Facilities" provides the specific MSBACT requirements for each applicable piece of equipment or emissions limit. [iv]

Part D identified dry cleaning as a specific process applicable to MSBACT.

2. METHODS: MSBACT DRY CLEANING CASE STUDY

Methods used to evaluate the MSBACT for dry cleaner followed the following steps: (1) Review of MSBACT guidelines for developing MSBACT for a specific application, (2) Review of the current MSBACT for dry cleaning, and (3) Using MSBACT guidelines and a literature review of dry clean alternatives, complete an analysis to determine whether there is sufficient evidence to update the MSBACT for dry cleaning.

3. FINDINGS: MSBACT DRY CLEANING CASE STUDY

3.1 Procedures for Developing MSBACT for a Specific Application

Part C of the SCAQMD BACT guidelines entitled "Part C – Policy and Procedures for Non-Major Polluting Facilities" states that MSBACT for each source category is the most stringent emission limit or control technology that is either: (1) found in a state implementation plan (SIP), or (2) achieved in practice (AIP), or (3) is technologically feasible and cost effective. Of these options, SCAQMD states most MSBACT is based on AIP since it is more stringent that SIP and less constrained by state law than the technologically feasible/cost effective approach.

Part C cites a number of information sources where AIP may be identified including regional, state, and federal clearinghouses, regional and state BACT guidelines, and regional and state permits as well as "any other source for which the requirements of AIP can be demonstrated."

Given that SCAQMD uses AIP to establish most MSBACT, below provides additional detail in Part C on AIP.

PART C states four criteria used by SCAQMD for listing an AIP control technology or emissions limit:

- Commercial Availability: At least one vendor must offer this equipment for regular or full-scale operation in the United States. A performance warranty or guaranty must be available with the purchase of the control technology, as well as parts and service.

- Reliability: The control technology must have been installed and operated reliably for at least twelve months on a comparable commercial operation. If the operator did not require the basic equipment to operate continuously, such as only eight hours per day and 5 days per week, then the control technology must have operated whenever the basic equipment was in operation during the twelve months

- Effectiveness: The control technology must be verified to perform effectively over the range of operation expected for that type of equipment. If the control technology will be allowed to operate at lesser effectiveness during certain modes of operation, then those modes must be identified. The verification shall be based on a District-approved performance test or tests, when possible, or other performance data.

- Cost Effectiveness: The control technology or emission rate must be cost effective for a substantial number of sources within the class or category. Cost effectiveness criteria are described in detail in a later section. Cost criteria are not applicable to an individual permit but rather to a class or category of source. PART C includes an extensive section on cost effectiveness methodology to be applied.

Part C then describes a five-step decision method for selecting MSBACT for each category of regulated equipment or emissions unit.

- Step 1: Identify all possible control technologies. In searching for options, Part C highlights a search for pollution prevention alternatives, cites the 1990 federal Pollution Prevention Act as establishing a "national policy that pollution should be prevented or reduced at the source whenever feasible" (p. 42), and lists five relevant pollution prevention/source reduction approaches:
  - Equipment or technology modifications
  - Process or procedure modifications
  - Reformulation or redesign of products
  - Substitution of raw materials
  - Improvements in housekeeping maintenance or inventory control

- Step 2: Eliminate technically infeasible options. This step is essentially comparable to the "effectiveness" criteria above.

- Step 3: Rank remaining control technologies. This ranking is based on the overall control effectiveness of the relevant pollutant(s). Part C states that this ranking not only be based on control efficiencies/emission rates/emission reduction but also take into account environmental impacts (e.g., toxic emissions, multi-media impacts) and energy impacts.

  Here it is important to note that these indirect environmental impacts are characterized in the next step and can be used as a basis for eliminating the highest-ranking option. It is also important to note that a pollution prevention alternative which eliminate the relevant pollutant(s) is likely to be selected as the highest-ranking option, being more stringent than options which reduce but do not eliminate the relevant pollutant(s).

- Step 4: Evaluation. The "most effective" options ranking highest is evaluate first. Part C provides some guidance on this evaluation – discuss each of the beneficial and adverse impacts, focus on direct impacts including a calculation of both incremental and average cost effectiveness. Part C provides detailed guidance on conducting cost effectiveness calculations If the evaluation of the "top option" is ruled out based on impacts and cost effectiveness, the next "most stringent alternative is evaluated.

It is important to note here that while the guidance provided in Part C for this evaluation is extremely clear on ruling out an option based on cost effectiveness, given the amount a detail provided on cost effectiveness in Part C, with respect to other impacts, Part C is extremely value concerning what constitutes a sufficient threshold from other impacts sufficient to rule out an option. Further, Part C in vague about what specific impacts are included. Presumably, these include the impacts listed in Step 3 -- environmental impacts (including toxic emissions and multi-media impacts) and energy impacts.

- Step 5: Select BACT. The most stringent option not eliminated in Step 4 is proposed as BACT and presented to SCAQMD for review and approval.

3.2 Current MSBACT for Non-Perc Dry Cleaning

Two SCAQMD rules are specifically related to dry cleaning: SCAQMD Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems and Rule 1102: Dry Cleaners Using Solvent Other Than Perchloroethylene. These two rules specify minimum equipment requirement and specify best practices associated with cleaners using perchloroethylene (Rule 1421) and non-perchloroethylene dry clean solvent.

Part D of the 2019 SCAQMD BACT Guidelines lists “Dry Cleaning” as a specific equipment or process category. Table 1 is a screenshot of the dry cleaning table listed on Part D.

The table shows MSBACT for dry cleaning was first created in 10-20-2000 “Rev. 0” and revised on 7-9-2004 “Rev. 1”. The first column in the table, labeled “Subcategory/Rating/Size” lists two subcategories of dry cleaning equipment: Perchloroethylene and Petroleum Solvent. Within the row labeled “Criteria Pollutants”, information on the two dry clean equipment sub-categories is provided for only one criteria pollutant, VOC/ODC. This listing of VOC/ODC shows that petroleum dry cleaning is directly associated with VOC/ODC emissions.

In the VOC/ODC column, perchloroethylene dry cleaning was said to be “delisted” as a VOC, citing SCAQMD Rule 1421 from June 13, 1997. As such, perchloroethylene dry cleaning was found to be exempted from MSBACT control technology or emissions reduction specifications. Here it is important to note that in 2002, SCAQMD amended Rule 1421, phasing out permitting of perc dry clean machines by December 2020.

For petroleum solvent dry cleaning, the table drops a footnote after “Petroleum Solvent” stating: “This Equipment may also be subject to AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene.” The Petroleum Solvents/VOC/ODC cell states: “Closed Loop, Dry-to-Dry Machine with a Refrigerated Condenser (10-20-2000) or Evaporatively Cooled Condenser (7-9-2004).” The two dates listed here are the identical dates for when this MSBACT for dry cleaning was first created and when it was revised, as shown in the top right corner of the table.

Table 1: SCAQMD MSBACT for Dry Cleaning

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0
7-9-2004 Rev. 1

Equipment or Process: Dry Cleaning

	Criteria Pollutants					
Subcategory/ Rating/Size	**VOC/ODC**	**NOx**	**SOx**	**CO**	**PM_{10}**	**Inorganic**
Perchloroethylene	Delisted as a VOC. See SCAQMD Rule 1421 – Control of Perchloroethylene Dry Cleaning Operations[1] (06-13-97)					
Petroleum Solvent[2]	Closed Loop, Dry-to-Dry Machine with a Refrigerated Condenser (10-20-2000) or Evaporatively Cooled Condenser (7-9-2004)					

[1] Rule 1421 implements the federal National Emission Standard for Hazardous Air Pollutant for Perchloroethylene Dry Cleaning Facilities (40 Code of Federal Regulations [CFR] 63.320, *et seq*) and the state Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations (17 California of Regulation [CCR] 93109, *et seq*).

[2] This Equipment may also be subject to AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene.

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

BACT Guidelines - Part D 43 Dry Cleaning

As such, the latest version SCAQMD's BACT Guidelines states that MSBACT for petroleum solvent dry cleaning are three emission control requirements build into a petroleum dry clean machine for reducing VOC emissions – (1) dry-to-dry – meaning apparel is put in dry and comes out dry thereby requiring that washing and drying be completed in the same drum, (2) closed loop – meaning that petroleum solvent evaporated during the dry cycle is captured and collected rather than being vented to the atmosphere, and (3) that the solvent capture system be condenser using either a refrigerant system or an evaporative cooling system.

To understand projected VOC emissions associated with this MSBACT for petroleum dry cleaning, it is fruitful to evaluate a 2007 SCAQMD document developed for permit streamlining entitled "PERMIT SAMPLE EVALUATION HYDROCARBON DRY CLEANING MACHINE (Based on applicable Rules & Regulations as of September 2007).[v] This six-page document is shown in Appendix A.

Page 2 of this document includes a heading entitled "EMISSIONS CALCULATIONS", shown in Figure 1 below, provides details related to how hydrocarbon emissions is projected for the applicant: the assumed volume of clothes cleaned of 600 lb/week, an estimated amount of hydrocarbon solvent use to process 600 lb/week of 10 gallons/month, an estimated 34% of the 10 gallons used will be emitted as VOCs, a density of hydrocarbon solvent of 6.41 lbs/gallon, and that monthly VOC emissions attributed to this activity comes to 21.8 pounds (10 gallons/month

* 34% * 6.41 lbs/gallon). In sum, a typical hydrocarbon dry cleaner cleaning 600 pounds of items a will use 10 gallons to hydrocarbon solvent per month, that 3.4 gallons/month is attributable to VOC emissions, and based on, 21.8 lb VOC/month, or 262 lb VOC/year.

EMISSION CALCULATIONS

Capacity [lb/load] :		50
Maximum Hydrocarbon consumption [gal/month] :		10
Clothes cleaned per week [lb/week] :		600
Density of HC/petroleum [lbs/gal] :		6.41
VOC emitted from HC dry cleaning system (based on Rule 1421 status report, 12/3/2004) :		34%
Control Efficiency (District policy on 12/3/2003) :		66%
Operating Schedule:	hr/day (average) =	9
	hr/day (max) =	10
	day/week =	6
	week/yr =	52

VOC Emission		Uncontrolled	Controlled
Monthly [lbs/mo]	= HC consumption x Petroleum density	64.1	21.8
Daily [lbs/day]	= Monthly / 4.33/ Max No of day per week	2.47	0.8
Hourly [lbs/hr]	= Daily / Max hours per day	0.25	0.08
Annual [lbs/year]	= Monthly controlled x 12 months	-	262
30-day avg [lbs/day]	= Monthly controlled/ 30 days	-	0.73

Figure 1: Hydrocarbon emissions calculation estimates from a SCAQMD a permit sample evaluation

3.3 Options Analysis for MSBACT for Non-Perc Dry Cleaning

An analysis of the literature shows a number of potential pollution prevention options that SCAQMD could considered as MSBACT for petroleum dry cleaning creating more stringent emission limits than the dry-to-dry closed-loop pollution control system currently listed as MSBACT. These potential pollution prevention options all use solvents not classified as VOCs including GreenEarth dry cleaning – using a siloxane-based solvent decamethylcyclopentasiloxane (or D5), CO_2 dry cleaning – using recycled CO2 as a solvent, and professional wet cleaning – using water as a solvent.

The first step in evaluating whether each of these zero-VOC alternatives could be used as MSBACT for petroleum dry cleaning is to assess each alternative with respect to the initial four baseline criteria stated in MSBACT guidance – commercial availability, reliability, effectiveness, and cost effectiveness. With respect to the first three, there is substantial evidence that GreenEarth, CO_2, and professional wet cleaning meet the minimum thresholds for each criterion detailed in SCAQMD BACT Guidelines PART C. The fact that SCAQMD has tracked professional

apparel cleaners in their own service territory using GreenEarth, CO_2, and professional wet cleaning over many years demonstrates the effectiveness and reliability of each of these options. For professional wet cleaning, additional support on effectiveness and reliability comes from a pair of peer review studies confirming the commercial viability of dry cleaners switching to professional wet cleaning in the greater Los Angeles region and in Massachusetts.[vi] With respect to cost-effectiveness, the fourth baseline criteria, each of these zero-VOC technologies meet the classification as cost-effectiveness based on the methods provided in the SCAQMD BACT Guidelines PART C, which uses $92,246/ton of ROG/VOC reduction as the threshold. For CO_2 dry cleaning and GreenEarth dry cleaning, cost per ton of ROG/VOC reduction are substantially lower than this threshold. For professional wet cleaning, with capital and operating costs being lower than petroleum dry cleaning, this technology shows a cost savings per ton of ROG/VOC reduced associated with cleaners switching to this technology option.[vii]

Since each of these zero-VOC technologies passes the four baseline criteria, the next step is to work through the SCAQMD's MSBACT Guidelines 5-step decision method for selecting MSBACT.

- Step 1, identifying possible control technologies: Each of these solvent substitute technologies can be considered a pollution prevention alternative, highlighted in the MSBACT PART C Guidelines as highly desirable.

- Step 2, eliminating technically infeasible options: As noted above, commercial viability on each zero-VOC alternatives, demonstrates all three options as passing through this gate.

- Step 3, rank remaining control technologies: MSBACT guidelines requires ranking to take into account both emissions reduction as well as other factors including environmental impacts. Each of these options eliminates VOC emissions associated with petroleum dry cleaning. With respect to toxicity, CO_2 dry cleaning and professional wet cleaning have been classified by the California Air Resources Board (CARB) as non-toxic and non-smog forming technologies; CARB created this classification in response to its authority to implement California law AB998 which provides incentives to perc dry cleaners switching to "non-toxic and non-smog-forming alternatives."[viii] While GreenEarth's D5 solvent does not appear to be smog-forming, CARB did not classified GreenEarth's D5 solvent as "non-toxic and non-smog-forming", specifically noting problems with toxicity concerning with D5.[ix] Further, in 2018 the European Union's regulatory agency implementing the EU's chemical legislation (ECHA) recently classified D5 as both a PBT (Persistent, Bioaccumulative, and Toxic), vPvB (very persistent and very Bioaccumulative), a substance of very high concern, placing D5 on a list of chemicals to be banned unless no other viable substitutes can be identified for a specific use.[x] Since MSBACT takes into account environmental impacts in rank ordering options for the most stringent emissions reduction, CARB's decision to reject listing D5 as non-toxic and ECHA's classification of D5 as a PBT and vPvB substance, suggests eliminating D5 as an option for MSBACT. At a minimum, GreenEarth would rank substantially lower than CO_2 and professional wet cleaning. These findings also suggest increased regulation of D5 dry cleaning by SCAQMD in Rule 1102 (see below).

- Step 4: Evaluation. While this step requires the "most effective" option be evaluated first, CO_2 dry cleaning and professional wet cleaning are tied as most effective given that both eliminate VOCs from petroleum dry cleaning, both are classified as non-toxic, and no other environmental impact

clearly separates these two alternatives at this time.[xi] The MSBACT Guidelines do provide some specific guidance for this evaluation step, including takings into account cost effectiveness calculations. As noted above, while both CO_2 and professional wet cleaning meet MSBACT Guidelines threshold as cost effective technologies, while CO_2's incremental cost effectiveness was estimated at slightly over $30,000 per ton of VOC reduced, a switch to professional wet cleaning resulted in a cost savings of slightly over $15,000 per tons of VOC reduced. As such, based on the evaluation criteria in MSBACT Guidelines, professional wet cleaning appears as the highest ranked "most effective" VOC-free alternative with no adverse impacts identified that would rule out this option.

- Step 5: Select BACT. Since professional wet cleaning was shown as the most stringent option not eliminated in Step 4, professional wet cleaning should be proposed as MSBACT for petroleum dry cleaning and be presented to SCAQMD for review and approval.

4. CONCLUSION: PROFESSIONAL WET CLEANING AS MSBACT DRY CLEANING

Based on SCAQMD MSBACT 5-step decision method guidelines, reliable evidence related to each criterion shows that zero-emission professional wet cleaning clearly meet the selection criterion as MSBACT for non-perc solvent-based dry cleaning.

The practical consequence of setting professional wet cleaning as BACT for non-perc dry cleaning is to prohibit further permitting of new non-perc dry cleaning in SCAQMD.

This classification of professional wet cleaning as BACT for non-perc dry cleaning should, in turn, trigger an amendment to Rule 1102 to include a phase out date for existing non-perc dry cleaning machine based on a fifteen year expected life.

The amendment of Rule 1102 provides SCAQMD the opportunity to remove the Rule 1102 exemption of siloxane-based D5 dry cleaning. As revealed in Step 3 of MSBACT completed above, based on an analysis of current toxicity evidence of D5, the European Union is move forward with steps to ban D5 from dry cleaning. Amending Rule 1102 provide SCAQMD the opportunity to remote D5 from the exemption list based on evidence substantially more recent than the date when Rule 1102 was last revised.

Appendix A: SCAQMD: PERMIT SAMPLE EVALUATION HYDROCARBON DRY CLEANING MACHINE

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

ENGINEERING EVALUATION FOR PERMIT TO CONSTRUCT/OPERATE

APPLICANT ABC CLEANER (Facility ID: 123456)

MAILING ADDRESS 12345 Abc St., Chino Hills, CA 91709

EQUIPMENT LOCATION Same as above.

PERMIT HISTORY

The permit application for the hydrocarbon dry-cleaning machine was filed on August 16, 2007 as a new construction. This unit will replace the existing perchloroethylene dry-cleaning machine to comply with the requirements of Rule 1421 and Rule 1402.

There is no history of any violation or nuisance complaints for this facility.

Fees: Fee Schedule A. Permit Processing fee for new construction is $1170.20 for fiscal year 2007-2008.

EQUIPMENT DESCRIPTION

DRY CLEANING MACHINE, PETROLEUM SOLVENT, UNION MODEL HL-850, CLOSED LOOP, WITH A REFRIGERATED CONDENSER.

BACKGROUND/SUMMARY

This model, Union HL 850 has a design capacity of 45-50 pounds. The solvent used in this machine is DF 2000 Fluid, distributed by Exxon Mobil Chemical (MSDS included). This is a synthetic, C12 to C13 aliphatic hydrocarbon with a density of 6.41 pounds/gallon. This unit has a mileage of 120 pounds cleaned a day.

CEQA ANALYSIS

This equipment is not part of a project that is subject to CEQA. There is no significant impact.

EMISSION CONTROL DESCRIPTION

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PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

This unit has a refrigerated condenser to reduce solvent losses during the cleaning and drying processes. Based on a staff report for Rule 1421 (December 3, 2004), it is estimated that the unit is 66% efficient in controlling the hydrocarbon emissions.

EMISSION CALCULATIONS

Capacity [lb/load] :	50
Maximum Hydrocarbon consumption [gal/month] :	10
Clothes cleaned per week [lb/week] :	600
Density of HC/petroleum [lbs/gal] :	6.41
VOC emitted from HC dry cleaning system (based on Rule 1421 status report, 12/3/2004) :	34%
Control Efficiency (District policy on 12/3/2003) :	66%

Operating Schedule:	hr/day (average) =	9
	hr/day (max) =	10
	day/week =	6
	week/yr =	52

VOC Emission		Uncontrolled	Controlled
Monthly [lbs/mo]	= HC consumption x Petroleum density	64.1	21.8
Daily [lbs/day]	= Monthly / 4.33/ Max No of day per week	2.47	0.8
Hourly [lbs/hr]	= Daily / Max hours per day	0.25	0.08
Annual [lbs/year]	= Monthly controlled x 12 months	-	262
30-day avg [lbs/day]	= Monthly controlled/ 30 days	-	0.73

RULES EVALUATION

RULE 212 – STANDARDS FOR APPROVING PERMITS

No public notice required as none of the criteria for public notice listed below is triggered.

(c)(1): Unit located within 1,000 feet of the outer boundary of a school.
(c)(2): Emission increases exceeding the daily maximums specified in subdivision (g) of this rule (VOC limit is 30 lbs per day)
(c)(3): Increases in emissions of toxic air contaminants such that Maximum Individual Cancer Risk (MICR) of greater than 1 x 10^{-6} for facilities with more than one permitted unit and greater than 10 x 10^{-6} for facilities with one permit unit.

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

RULE 401 – VISIBLE EMISSIONS

Compliance is expected with well maintained and properly operated equipment.

RULE 402 – NUISANCE

No nuisance is expected with well maintained and properly operated equipment.

RULE 442 - USAGE OF SOLVENTS

Monthly VOC emissions from this equipment are less than 833 pounds/month.

RULE 1102 - DRY CLEANERS USING SOLVENT OTHER THAN PERCHLOROETHYLENE

The dry cleaning machine is equipped with a refrigerated vapor condenser which is a primary control system for the equipment. Liquid leaks and solvent exposure to the atmosphere are expected to be minimal with proper care and maintenance. Compliance is expected.

REGULATION XIII – NEW SOURCE REVIEW

RULE 1303(a) – BEST AVAILABLE CONTROL TECHNOLOGY (BACT)
Emission increase is more than one pound per day for VOC, so BACT is applicable.
This is a minor source BACT. Per Part D of the BACT guidelines [http://www.aqmd.gov/bact/part-d-final-7-14-2006-update.pdf], current BACT for dry cleaning equipment using petroleum solvent is a closed loop, dry-to-dry machine with a refrigerated condenser or evaporative cooled condenser. The facility is proposing closed loop system that utilizes a refrigerated condenser. BACT requirements are met.

RULE 1303(b)(1) – MODELING
The unit emits only VOC which is exempt from modeling requirements.

RULE 1303(b)(2) – EMISSION OFFSETS
The potential to emit from this facility in AQMD's NSR system shows 0 tons a year. The emissions from the current machine using perchloroethylene are not considered a VOC. The offset threshold is 4 tons per year or 22 lbs per day. The emission increase from the use of the hydrocarbon solvent is less than 22 lbs per day therefore no offset are needed.

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

Pollutant	Facility Potential to Emit [lbs/ year]			Offset Threshold [lbs/day]	Offset Required? Yes/No
	Before Construction	From Equipment	Total (After Construction)		
VOC	0	0.8	0.8	22	No

REGULATION XIV

RULE 1401 – NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

As per the MSDS, the DF 2000 Fluid contains no toxic air contaminants listed in Rule 1401. (Amended March 4, 2005). Therefore this rule does not apply.

RULE 1401.1 – REQUIREMENTS FOR NEW AND RELOCATED FACILITIES NEAR SCHOOLS
Not applicable.

RECOMMENDATION

All applicable Rules and Regulations have been met. A permit to construct is recommended with the conditions shown on the sample permit pending completion public notice if required.

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

PERMIT CONDITIONS

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE 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 ONLY USE, AS A DRY CLEANING FLUID, PETROLEUM SOLVENT WITH AN INITIAL BOILING POINT OF NOT LESS THAN 375 DEGREES FAHRENHEIT.

4. THE TOTAL QUANTITY OF PETROLEUM SOLVENT THAT IS REPLENISHED IN THIS EQUIPMENT SHALL NOT EXCEED 10 GALLONS PER MONTH, AVERAGED OVER ANY 12-MONTH PERIOD.

5. EACH WORKING DAY, THE OPERATOR OF THIS EQUIPMENT SHALL INSPECT AND CLEAN WITH A WET CLOTH THE FOLLOWING COMPONENTS:
   A. GASKETS AND EDGES OF THE LOADING DOOR
   B. LOADING DOOR LINER
   C. LINT FILTER
   D. AIR FILTER
   E. WASTE WATER SEPARATOR

   IF ANY OF THE SEALS AND/OR GASKETS SHOW SIGNS OF WEAR (E.G. CUTS OR TEARS) SUCH THAT THEY CANNOT PROVIDE AN IMPERVIOUS SEAL AGAINST LIQUID, VAPOR OR AIR LEAKAGE FROM THE DRY CLEANING MACHINE, THE EQUIPMENT SHALL NOT BE OPERATED UNTIL THOSE SEALS AND/OR GASKETS ARE REPLACED.

6. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS OF RULE 1102, THE OPERATOR SHALL KEEP RECORDS OF SOLVENT USAGE, INSPECTIONS AND REPAIRS TO SHOW COMPLIANCE WITH CONDITION NO.4 AND 5. THESE RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT

7. ALL WASTE MATERIALS WHICH COME INTO CONTACT WITH ANY PETROLEUM SOLVENT SHALL BE STORED IN CLOSED CONTAINERS, AND DISPOSED OF IN ACCORDANCE WITH THE REQUIREMENTS OF THE DEPARTMENT OF HEALTH SERVICES.

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

8. PETROLEUM SOLVENTS USED IN THE EQUIPMENT SHALL NOT CONTAIN ANY CARCINOGENIC AIR CONTAMINANTS AS IDENTIFIED IN RULE 1401 AS AMENDED ON MARCH 4, 2005.

9. MATERIAL SAFETY DATA SHEETS FOR ALL DRY CLEANING SOLVENTS USED AT THIS FACILITY SHALL BE KEPT CURRENT AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

10. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE RETAINED AT THE FACILITY FOR AT LEAST TWO YEARS AND MADE AVAILABLE TO ANY DISTRICT PERSONNEL UPON REQUEST.

11. THIS EQUIPMENT SHALL COMPLY WITH RULE 1102.

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Last updated 9/21/07
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Appendix 2

Track Changes to March 2022 Draft SLA CERP

Table 5d-1: Actions to Reduce Emissions from and Exposure to General Industrial Facilities

Goal	Action	Responsible Entity(ies)	Matic(s)	Timeline	
				Start	Complete
C: Dry Cleaners	~~• Enforcement of existing South Coast AQMD and CARB regulations (e.g., South Coast AQMD Rule 1102, South Coast AQMD Rule 1421, CARB Airborne Toxic Control Measure for Emissions of Perchloroethylene (Perc) from Dry Cleaning Operations (Dry Cleaning ATCM))~~ Set acceptable emissions from non-perc solvent-based dry clean systems regulated by Rule 1102 to zero based on viability of zero-emission alternatives. • Phase out existing non-perc dry clean solvent machines after useful life and remove regulatory exemptions for non-perc dry clean solvent machines • ~~Identify~~ Create incentive opportunities to transition to ~~community-identified green alternatives~~professio	South Coast AQMD CSC	• ~~Number of Rule 1102 and Rule 1421 inspections~~ Modify BACT (Best Available Control Technology) for non-perc solvent dry clean machines using professional wet cleaning, setting the acceptable VOC emissions at zero • Amend Rule 1102 to eliminated Rule 102 Group II exemption [by striking (b) 13 and (h) II] and phase out non-perc dry clean machines after fifteen years for the date of installation • Provide list of incentive opportunities to support transition to ~~green alternatives~~professional wet cleaning, ~~if incentive opportunities are identified~~ (and other commercially viable zero-emission technology when identified) • Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102	3rd quarter 2022 ~~2023~~ 3rd quarter 2022 3rd quarter 2022 4th quarter 2022	4th quarter 2022 3rd quarter 2023 2027 (note: assess need after 5 years)

	nal wet cleaning (and other commercially viable zero-emission technologies when identified) • Community outreach to owners and operators regarding regulatory changes, incentives for zero-emissions technologies, and demonstration workshops on ~~green alternative practices~~professional wet cleaning (and other commercially viable zero-emission technology when identified)		permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of new BACT classification for non-perc solvents machines • Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102 permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of Rule 1102 rule change • Support creating professional wet cleaning demonstration program to jump start transition to zero emission professional apparel cleaning alternatives. • Number of outreach materials distributed to owners and operators be published on the website concerning new BACT, changes in Rule 1102, availability of incentives, and ongoing demo workshops on zero-emission technologies	3rd quarter 2023 3rd quarter 2022 4th quarter 2022	2027 (Note assess need for demo program after five years) 2027 (Note assess need if demo program extended

[i] http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/overview.pdf
[ii] http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/overview.pdf
[iii] http://www.aqmd.gov/home/permits/bact/guidelines
[iv] http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/part-d---bact-guidelines-for-non-major-polluting-facilities.pdf
[v] http://www.aqmd.gov/docs/default-source/permitting/dryclean_template.pdf
[vi] Sinsheimer, P., Grout, C., Namkoong, A., Gottlieb, R., & Latif, A. (2007). The viability of professional wet cleaning as a pollution prevention alternative to perchloroethylene dry cleaning. *Journal of the Air & Waste Management Association*, *57*(2), 172-178; Onasch, J., Jacobs, M., & Biddle, E. (2017). From Perchloroethylene Dry Cleaning to Professional Wet Cleaning: Making the Health and Business Case for Reducing Toxics. *Journal of Environmental Health*, *79*(6).
[vii] For CO2 dry cleaning, capital cost of the CO2 system is estimated to be $60,000 greater than a petroleum/hydrocarbon system. This amounts to a total present value of $40,533 based on the assumptions provided in PART C of a 4% interest rate over the 10-year equipment life. Using the figure of 261 lbs/year of VOC emissions, total emissions over 10 years comes to 2,610 lbs or 1.3 tons. Cost per ton of VOC/ROG reduced for CO2 dry cleaning versus petroleum dry cleaning comes to $31,179 per ton of VOC/ROG reduced ($40,533/1.3 tons). For GreenEarth, capital costs are relatively comparable to petroleum dry cleaning. Assuming a $1 increase in net present value, the cost of ton of professional wet cleaning compared to petroleum dry cleaning comes to a cost of $0.77/ton ($1/1.3 tons) of VOC/ROG reduced. For professional wet cleaning, both capital costs and operating costs have been shown to be lower than for petroleum dry clean. Assuming a $20,000 decrease in net present value, $15,385 savings (-$20,000/1.3 tons) per ton of VOC/ROG reduced.
[viii] http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200320040AB998
[ix] California Air Resources Board. Alternative Solvents: Health and Environmental Impacts. (https://www.arb.ca.gov/toxics/dryclean/notice2015_alt_solvents.pdf) (September 4, 2015).
[x] 2018 6 20 European Chemical Agency. Inclusion of substances of very high concern in the Candidate List for eventual inclusion in Annex XIV (Decision of the European Chemicals Agency),
[xi] Note: While CO2 is classified as a greenhouse gas, CO2 dry clean machine manufacturers claim that the CO2 used in CO2 dry cleaning machines is captured from locations where the CO2 would otherwise be emitted to the atmosphere, such as from landfills or industrial production, and thus should not be considered as creating new CO2 emissions. That said, if capturing CO2 from landfills or industrial production can cost-effectively be sequestered, permanently eliminating these CO2, CO2 emissions from CO2 dry cleaning should be considered as creating an adverse environmental impact.

Executive Summary

Response to Comment 1-1

South Coast AQMD recognizes and appreciates the efforts that community-based organizations took to ensure South Los Angeles (SLA) was selected as an Assembly Bill 617 (AB 617) community. Information regarding the historical work of community co-leads and efforts of South Central Los Angeles Project to Understand the Sources and Health Impacts of Local Air Pollution (SCLA-PUSH) is included in Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, section "South Los Angeles History and Background."

Chapter 2b has a section that is dedicated to the community profile and provides additional information about SLA and the community co-leads to better showcase this community and the work of the community co-leads. (Disclaimer: The views and opinions expressed in Chapter 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast AQMD.)

Response to Comment 1-2

The proposed language regarding air pollution in South Central Los Angeles, with minor edits, is included in Chapter 2b, section "South Los Angeles History and Background."

Response to Comment 1-3

This line is revised to remove "new" to properly reflect that AB 617 funds are not from new resources.

Response to Comment 1-4

The proposed language regarding the AB 617 program, with minor edits, is included in Chapter 2b, section "AB 617 Program."

Response to Comment 1-5

This section refers to the general AB 617 community designation process. SLA's community designation as a Year 3 community is discussed in Chapter 1: Introduction, section "Assembly Bill 617 Designated Communities."

Response to Comment 1-6

This line is revised to include "and develop actions to address the air quality priorities" to clarify that in addition to addressing a community's air quality priorities, the Community Emissions Reduction Plan (CERP) also develops solutions to these air quality priorities.

Response to Comment 1-7

The proposed language regarding the work of the community co-leads with respect to SLA's AB 617 designation, with minor edits, is included in Chapter 2b, section "CARB AB 617 Community Designation."

Response to Comment 1-8

The original language is retained in this section and provides information on when SLA was designated as an AB 617 community.

Response to Comment 1-9

Information regarding the community co-lead model is included in Chapter 2b, section "Community Co-Leads" and Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process, section "Community Co-Leads."

Response to Comment 1-10

Language regarding SLA as the first South Coast AQMD AB 617 community to use the community co-lead model is added in Chapter 3, section "Community Co-Leads."

Response to Comment 1-11

This line is revised to replace "formulated" with "used" to properly reflect that South Coast AQMD did not formulate the co-lead model.

Response to Comment 1-12

The CARB Blueprint assumes a five-year implementation schedule. Many of the actions included in this CERP will be developed over a period of time and their implementation may take place over several years depending on the proposed action. Some actions (e.g., outreach activities and "No Idling" sign placement) may fulfill the intent of a goal within five years. Other actions (e.g., implementation of regulations and best management practices) will continue in perpetuity. South Coast AQMD aims to complete implementation of each CERP action within a five-year timeframe, in accordance with CARB's Blueprint.

Response to Comment 1-13

The original language is retained in the Executive Summary and not moved to Chapter 1; the purpose of the Executive Summary is to provide an overview of the contents of the CERP.

Response to Comment 1-14

This line is revised to include the community co-leads in the CERP implementation and tracking process.

Response to Comment 1-15

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution, section "Emission Reduction Targets" contains information regarding emission reduction targets of this CERP. Goals and actions for each air quality priority are included in the subchapters of Chapter 5 (Chapters 5b through 5f).

Response to Comment 1-16

The "Just Transition and Community Projects" is incorporated into Chapter 2c: Just Transition as Presented by the Community Co-Leads and includes a disclaimer that "The views and opinions expressed in Chapter 2c are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast Air AQMD."

Response to Comment 1-17

For each AB 617 community, South Coast AQMD tracks all CERP goals, actions, and metrics to ensure emission reductions are achieved throughout CERP implementation. South Coast AQMD will provide periodic updates to the CSC at quarterly CSC meetings and in the Annual Progress Report submitted to CARB, as outlined in the CARB Blueprint. Annual Progress Reports include status updates on all strategies and metrics for tracking progress, qualitative progress assessment, and planned changes based on progress (if any), and completion of required elements.

Response to Comment 1-18

A brief discussion of each of the appendices is added to the Executive Summary, section "The Reader's Guide to this Community Emissions Reduction Plan."

Chapter 1: Introduction

Response to Comment 1-19

Information regarding the California Greenhouse Gas Cap-and-Trade program is included in Appendix 2a: Community Profile, section "Best Available Retrofit Control Technologies Requirement" and Appendix 5a: South Coast AQMD Regulatory Programs and Ongoing Efforts, section "Regulation XX – REgional CLean Air Incentives Market." The "Regulatory Background" section includes the development of AB 617.

Response to Comment 1-20

This line is revised to add "health" as one of the factors that adds to a community's cumulative burden.

Response to Comment 1-21

This line is revised to remove "new" to properly reflect that AB 617 funds are not from new resources.

Response to Comment 1-22

This line is revised to replace "consultation" with "collaboration" to properly reflect that CERP development is a collaborative effort. "Community members" is added as one of the entities that are collaborating during CERP development.

Response to Comment 1-23

This line is revised to include "and develop corresponding goals and action" to clarify that in addition to addressing a community's air quality priorities, the CERP also develops solutions to these air quality priorities.

Response to Comment 1-24

The proposed language regarding the community co-leads guiding the Community Steering Committee (CSC) is not included in this section "Regulatory Background." Language regarding this sentiment is in the Executive Summary and Chapter 2b. The proposed language regarding air

quality ambassadors, with minor edits, is included in Chapter 2b, section "Community Co-Leads and CERP Development."

Response to Comment 1-25

The proposed language regarding the work of SCLA-PUSH and community-based organizations with respect to SLA's AB 617 designation, with minor edits, is included in Chapter 2b, section "Community Co-Leads and CERP Development."

Response to Comment 1-26

This header is revised to remove "of this Community Emissions Reduction Plan" and is now "Purpose."

Response to Comment 1-27

This language is retained in the Executive Summary and not moved to Chapter 1, but the formatting is revised to reflect this comment. The purpose of the Executive Summary is to provide an overview of contents of the CERP.

Response to Comment 1-28

Chapter 2b, section "Environmental Issues Outside of Scope of the CERP" includes additional community concerns, which are outside the scope of the CERP. Language regarding the four drivers of disparity in SLA is included in Chapter 2b, section "Drivers of Disparity."

Response to Comment 1-29

South Coast AQMD recognizes that the SLA community experiences additional burdens (e.g., poverty, lack of economic and educational opportunities). The SLA community was selected as an AB 617 community based on several factors, including its CalEnviroScreen 3.0 score. CalEnviroScreen data includes public health, social, and economic factors in SLA. More information regarding CalEnviroScreen, including CalEnviroScreen data, can be found in Chapter 2d and Appendix 2a: Community Profile. Maps containing CalEnviroScreen data capturing SLA's disproportionate burden are included in Figure 2d-2 "Overall CalEnviroScreen 4.0 Score Percentile for the Basin" of Chapter 2d and Figure A2a-2 "CalEnviroScreen 4.0 Map of SLA" of Appendix 2a.

The CSC identified additional pollution concerns, such as fireworks, airplane exhaust, worker exposure, noise pollution, illegal dumping, volume of facilities in the community, hazardous waste disposal, water and soil contamination, and chemical cargo transported on trains. These pollution concerns are not included as air quality priorities in this CERP, as they were not prioritized by the CSC or South Coast AQMD does not have sole or direct authority to address these concerns. South Coast AQMD does not have sole or direct authority to address certain sources of pollution and/or environmental hazards; other government agencies, such as the United States Department of Labor Occupational Safety and Health Administration (OSHA), Department of Toxic Substances Control (DTSC), city or county fire departments, and city or county planning agencies. However, South Coast AQMD believes there is value in collaborating with other agencies and this CERP has several actions which commit South Coast AQMD and

CARB to collaboration with other agencies as outlined in **Table A8-1**. Chapter 2a, section "Air Quality Priorities," includes a discussion regarding CSC-identified pollution concerns that are not included as air quality priorities. For more information regarding these concerns, please refer to Appendix 5d: General Industrial Facilities. Language was also added to Chapter 2b, subsection "Environmental Issues Outside of Scope of the CERP" and Appendix 5d: General Industrial Facilities, section "Other Government Agencies and their Authority," to capture these community concerns, the appropriate responsible agency, and their respective authority. The source attribution presented in Chapter 2d: Emissions and Source Attribution and Appendix 2d: Source Attribution quantifies the emissions from within the community. Contribution from sources outside of the SLA community boundary are not in the scope of the source attribution report. All CERPs are focused on local sources of air pollution that operate within that community boundary.

The CSC also mentioned fireworks as an air quality concern, but it was not chosen as an air quality priority. South Coast AQMD conducts air monitoring and analysis to assess the PM levels and metal content during Independence Day fireworks annually. More information on South Coast AQMD's data reports and assessments can be found in Appendix 5d.

Appendix 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process includes CalEnviroScreen data regarding public health, social, and economic factors in SLA. Additional burdens that SLA residents experience is included in Chapter 2b, section "Environmental Issues Outside of Scope of the CERP."

Table A8-1: SLA CERP Actions Regarding Collaboration with Other Agencies

Chapter: Air Quality Priority	Goal	Action
5b: Mobile Sources	B: Reduce Exposure at Schools	Work with local school districts and the CSC to develop a prioritization list of schools for air filtration systems and to support community projects that reduce students' exposure to air pollution
	F: Agency Collaboration	Pursue collaborations with local agencies to identify strategies to address the CSC's concerns with truck traffic and designated truck routes
5c: Auto Body Shops Emissions and Source Attribution	A: Inform Community of Pertinent Rules	Collaborate with partner agencies who also have jurisdiction over auto body shops to present information regarding their authority at Auto Body Shops Workshop

Chapter: Air Quality Priority	Goal	Action
	C: Agency Collaboration and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during auto body shop inspection sweeps
5d: General Industrial Facilities	B: Identify Strategies	Identify emissions and exposure reduction measures, if appropriate (e.g., collaborating with appropriate agencies)
	D: Agency Collaboration and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's authority jurisdiction during inspection sweeps at general industrial facilities
5f: Oil and Gas Industry	B: Monitoring	Collaborate with appropriate agencies and the CSC to determine if additional air monitoring is needed during specific well activities or under certain conditions
	C: Agency Collaborations and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during inspection sweeps at oil and gas facilities
	H: Other Governmental Agency Projects	Identify opportunities for other agencies to provide information on their respective oil and gas related authority, existing and proposed rules and regulations, and/or projects and programs

Response to Comment 1-30

The original language is retained in Chapter 1; this section is a general overview of South Coast AQMD's perspective on the challenges of the AB 617 program.

Proposed language, with minor edits, regarding the challenges from the community co-lead perspective is included in Chapter 2b, section "Assembly Bill 617 (AB 617) Program."

New language was also included in Chapter 3, Section "Community Meetings" regarding the uniqueness of SLA community, challenges due to the COVID-19 pandemic, and the dedication of the community co-leads, CSC-members, and other community members. Additionally, see **Table A8-2** for chapters that are renumbered and/or retitled.

Table A8-2: Updated CERP Chapter Titles

Preliminary Draft Chapter Title	Preliminary Draft Chapter Number	New Chapter Title	New Chapter Number
Community Outreach, Community Steering Committee, and Public Process	2	**Community Outreach, Community Steering Committee, Community Engagement, and Public Process**	**3**
Community Profile	3a	**Community Profile**	**2a**
Emissions and Source Attribution	3b	**Emissions and Source Attribution**	**2d**

Response to Comment 1-31

This header is revised to replace "input" with "engagement."

Response to Comment 1-32

This section is an overview of the community's involvement in the development of the CERP. A longer discussion on CERP development and community engagement is provided in Chapter 3, section "Community Engagement and Input Process" and Chapter 2b, section "Community Co-Leads and CERP Development."

Response to Comment 1-33

This language is clarified and refers to the January 14, 2021 meeting as the "first community meeting (Community Kick-Off Meeting);" South Coast AQMD refers to the first community meeting as the Community Kick-Off Meeting. Additional details related to the January 14, 2021 meeting is provided in Chapter 3, section "First Community Meeting (Community Kick-Off Meeting)" and Appendix 3, Table A3-2 "CSC Meeting Schedule" And Table A3-4 "Community Meeting Information."

Response to Comment 1-34

The "What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference" is included in the timeline; the details of the conference are included in Chapters 2b and 3 section "What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference."

Response to Comment 1-35

The proposed language regarding virtual meetings due to the COVID-19 pandemic is expanded and added to Chapter 3, section "Community Meetings."

Response to Comment 1-36

This section has been moved to Chapter 2a, section "Community Boundary" and includes a list of all the communities, as designated by land-use agencies, in the SLA boundary.

Response to Comments 1-37 and 1-38

These figures have been moved to Chapter 2a, section "Community Boundary" (see Figure 2a-2 "SLA Community Boundary") and section "Community Demographics Profile" (see Figure 2a-3 "Population by Race/Ethnicity in SLA and the State of California based on 2010 Census" and Figure 2a-4: Age Profile in SLA and the State of California, based on 2010 Census), respectively.

Chapter 2 (now Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process)

Response to Comment 1-39

Chapter 2: Community Outreach, Community Steering Committee, and Public Process in the Preliminary Draft CERP is now Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process. See Response to Comment 1-30.

Response to Comment 1-40

The proposed language, with minor edits, is included in Chapter 3 section "Community Co-Leads."

Response to Comment 1-41

The original language of "input" is retained as South Coast AQMD believes the CSC provides input and guidance whereas the community co-leads provide community leadership and guidance. South Coast AQMD revised this sentence to include "community driven goals" to clarify that the CSC provided input and guidance on both the goals and actions for the community plans.

Response to Comment 1-42

The language is revised to replace "comprised" with "composed."

Response to Comment 1-43

The proposed language regarding the community co-lead work with respect to establishing the CSC, with minor edits, is included in Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, section "Community Co-Leads and CERP Development," and Chapter 3 section "Formation of the Community Steering Committee."

Response to Comment 1-44

Language is added to Chapter 3 section "Formation of the Community Steering Committee" to clarify that outreach began in March 2021 and the CSC was finalized in May 2021. This rest of the language regarding virtual meetings is moved to section "Community Meetings" of Chapter 3.

Response to Comment 1-45

This language regarding interpretation and translation is moved to section "Community Meetings" of Chapter 3.

Response to Comment 1-46

This language regarding continued collaboration with the CSC during CERP implementation is moved to section "Additional Community Engagement" of Chapter 3.

Response to Comment 1-47

This language is revised to reflect that the CSC Charter was developed by the community co-leads in collaboration with South Coast AQMD.

Response to Comment 1-48

This section is moved to section "Community Engagement and Input Process" of Chapter 3 and the language is revised to include the involvement of the community co-leads.

Response to Comment 1-49

This language is revised to reflect that the community meetings were hosted by South Coast AQMD collaboration with the community co-leads.

Response to Comment 1-50

The section header is updated to "First Community Meeting (Community Kick-Off Meeting);" Proposed language regarding the number of community members organized by the community co-leads for the first community meeting, with minor edits, is included in Chapter 2b, section "Community Co-Leads and CERP Development."

Response to Comment 1-51

The proposed language regarding this conference, with edits, is included in Chapter 2b, section "What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference." Information regarding the "What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference" is included in Chapter 1, Section "Community Designation and Community Emissions Reduction Plan Development Timeline" and the details of the conference are included in Chapters 2b and 3 section "What's Up with the Air in South LA? An AB 617 Air Quality Virtual Conference."

Response to Comments- 1-52 and 1-53

The proposed language regarding the details of the March 11, 2021 and April 1, 2021 meetings, with minor edits, is included in Appendix 3, Table A3-5 "Summary of Community Meetings".

Response to Comment 1-54

Figure 1-2 "SLA Community Designation and CERP Development Timeline" is retained in Chapter 1: Introduction, but is updated to include additional meeting information.

Response to Comment 1-55

Chapter 2d, section "Future Year Baseline Emissions Inventory" and Chapter 5a, section "Estimated Emissions Reductions from CARB Statewide Measures" detail future projections of

emissions reduction within the SLA community, including trends for TAC emissions and the effects of CARB's statewide strategy for emissions reductions. Please see Response to Comment 1-17 regarding CSC updates on emissions reductions achieved.

Response to Comments 1-56 and 1-57

Chapter 3 section "Meeting Facilitator" discusses details on the meeting facilitator and includes language regarding the community co-leads working in collaboration with South Coast AQMD to select a specific meeting facilitator. The proposed language regarding the community co-leads' view of the meeting facilitator, with minor edits, is included in Chapter 2b section "Meeting Facilitator." Please note the meeting facilitator (Castillo Consulting Partners) has a contractual agreement with South Coast AQMD and is compensated.

In accordance with CARB's Blueprint, a CSC is established to guide the development of the program elements since this process "require[s] consistent and frequent engagement with [CSC] at all stages of the development process." A CSC member or community co-lead may act as a liaison for members of the public during CERP development to ensure their feedback was included throughout the process. South Coast AQMD also records the public voice through comment letters received, regardless of CSC member status, and provides a response to comment in this Appendix.

CSC meetings are on Facebook Live and recorded, and are available on the AB 617 webpage (http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la) to ensure the community voice is captured. Additionally, during CSC meetings, the CSC voice is elevated by the facilitator by prioritizing CSC comments and questions. Members of the public, who are not CSC members, are allowed to speak and provide comments at the end of the meeting during the "Public Comments" portion of the agenda.

Response to Comment 1-58

The proposed language regarding best practices for community meetings is included in Chapter 3, section "Community Engagement Tools." The proposed language referring to challenges to community meetings is included in Chapter 2b, section "Community Meeting Challenges."

Response to Comment 1-59

The proposed language regarding additional community outreach activities, with minor edits, is included in Chapter 2b, section "Community Engagement and Outreach" and Chapter 3, section "Additional Community Engagement."

Response to Comment 1-60

This language is revised to clarify that participating in one-on-one or small group meetings and attending community meetings is one of the tools used to engage with community members.

Response to Comment 1-61

This language is deleted as discussion on upcoming CSC meeting agendas were not included on the agenda.

Response to Comment 1-62
This language is revised to remove the repetition.

Response to Comment 1-63
This language is retained, but "in person" is removed to properly reflect that all meetings have been virtual.

Chapter 3a (now Chapter 2a: Community Profile)

Response to Comment 1-64
Language is included in Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, section "Community Boundary" to list all communities within the SLA boundary.

Response to Comment 1-65
The proposed language regarding the SLA boundary, with edits, is included in Chapter 2b, section "Community Boundary."

Response to Comment 1-66
The figure from Chapter 1: Introduction of the Preliminary Draft CERP is moved to Chapter 2a of the Final CERP as Figure 2a-1 "Location of the South Los Angeles Community within South Coast AQMD's Jurisdiction."

Response to Comment 1-67
This CalEnviroScreen 3.0 map of South Central Los Angeles is included in Chapter 2b, section "Air Quality Profile." Please note that this map is provided by the community co-leads and not developed by the South Coast AQMD.

Response to Comment 1-68
This proposed language in this comment is combined with the proposed language in Comment 1-65 regarding the SLA boundary, with minor edits, is included in Chapter 2b, section "Community Boundary."

Response to Comment 1-69
The proposed language regarding SLA history and background, with minor edits, is included in Chapter 2b, sections "South Los Angeles History and Background" and "History of Redlining in South Los Angeles."

Response to Comment 1-70
Page 37 of the Wilmington, Carson, West Long Beach CERP (http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf) does not contain a timeline.

Response to Comment 1-71
The proposed language regarding SLA today, with minor edits, is included in Chapter 2b, section "South Los Angeles Today."

Response to Comment 1-72

The proposed language regarding SLA population characteristics, with minor edits, is included in Chapter 2b, section "Population Characteristics."

Response to Comment 1-73

This section from Chapter 1 of Preliminary Draft CERP is moved to Chapter 2a, section "Community Demographics Profile" of the Final CERP.

Response to Comment 1-74

The proposed language regarding South Central Los Angeles air quality profile, with edits, is included in Chapter 2b, section "Air Quality Profile."

Response to Comment 1-75

For more information related to the air quality priorities and their pollutants of concern, please refer to Appendices 2d: Source Attribution and 5b through 5f. A CalEnviroScreen 4.0 map of SLA is added to Appendix 2a (see Figure A2a-2 "CalEnviroScreen 4.0 Map of SLA").

Response to Comment 1-76

The header is marked in red but does not have a comment or proposed edit, header is retained.

Response to Comment 1-77

The proposed language regarding the link between air quality and land-use patterns, with minor edits, is included in Chapter 2b, section "Community Land Use Profile."

Response to Comment 1-78

Appendices 5b through 5f are organized by air quality priority and include sources of air pollution, emissions from those sources, and an overview of rules that may be applicable to those sources. An interactive online SLA Story Map will be created that includes stationary sources of concern identified by the CSC for each air quality priority. The interactive online SLA Story Map will be available after CERP adoption.

Response to Comment 1-79

South Coast AQMD will work with the CSC to identify locations of mobile sources of concern that will be added to the interactive online SLA Story Map. SLA does not have any railyards within its community boundary.

Response to Comment 1-80

Maps are added in Chapters 5b: Mobile Sources (see Figure 5b-3 "Warehouses Subject to Rule 2305 in SLA"), 5c: Auto Body Shops (see Figure 5c-1 "Permitted Auto Body Shops in SLA"), 5e: Metal Processing Facilities (see Figure 5e-1 "Metal Processing Facilities in SLA"), and 5f: Oil and Gas Industry (see Figure 5f-1 "Oil and Gas Facilities in SLA") to note facility locations that may be of concern to the CSC per air quality priority. A map is not included for Chapter 5d: General Industrial Facilities as there are over 350 facilities categorized as general industrial facilities. An interactive online SLA Story Map will also be created that includes stationary sources of concern

identified by the CSC for each air quality priority. The interactive online SLA Story Map will be available after CERP adoption.

Response to Comment 1-81
The requested health profile information is included in Appendix 2a, section "CalEnviroScreen."

Response to Comment 1-82
The proposed language regarding SLA cumulative burden, with minor edits, is included in Chapter 2b, section "Air Quality Profile."

Response to Comment 1-83
The community co-lead quotes are included in Chapter 2b, section "Community Voices."

Chapter 3b (now Chapter 2d: Emissions and Source Attribution)

Response to Comment 1-84
Additional language, figures, and images, similar to the West Oakland CERP, are added throughout Chapter 2d: Emissions and Source Attribution to provide clarification and readability.

Response to Comment 1-85
The emissions data in Chapter 2d represents baseline emissions (2019) and emission projections for future milestone years (2026 and 2031). Projected diesel particulate matter (DPM) reductions are from the implementation of existing regulations as discussed in Chapter 5a: Introduction to Actions to Reduce Community Air Pollution. These include CARB's statewide measures that target diesel engines. Through the CERP, additional emission reductions will be achieved, which will further reduce emissions.

Response to Comment 1-86
The emissions inventory for this community is developed following the methodology described in the Methodology for Source Attribution Analyses for the first year AB 617 Communities in the South Coast Air Basin (Technical Report), which can be found here: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/source-attribution-methodology.pdf, and is consistent with the methodology used for emission inventories in all other South Coast AQMD AB 617 designated communities. The Technical Report is acknowledged in Chapter 2d, section "Introduction".

The emissions inventory for the source attribution analysis is not measured directly but compiled through a combination of tools and include emissions from all sources in SLA. Table 2d-3 "Emissions from all Sources in SLA in 2019" in Chapter 2d, section "Emissions from All Sources" provides the emissions from all sources in SLA and is divided into four major source categories:

1. facilities (stationary sources),
2. areawide sources (emissions from sources widespread throughout the community like consumer products, home water heaters),
3. on-road sources, and

4. off-road sources.

An explanation of the methodology used for each of the major source categories is added in Chapter 2d, section "Pollution Sources."

Response to Comment 1-87

The language regarding AB 617 statutory requirements in Chapter 2d is moved from the main paragraph to a footnote; it is important to note that the source attribution report follows AB 617 statutory requirements.

Response to Comment 1-88

The language in Chapter 2d, section "Introduction" is revised for clarification.

Response to Comment 1-89

Additional maps in Figures 2d-1 "Residential Air Pollutants Cancer Risk Calculated in the MATES IV and V Study for the Basin" and Figure 2d-2 "Overall CalEnviroScreen 4.0 Score Percentile for the Basin" are added in Chapter 2d, section "Introduction", to show the higher air toxics risk and environmental burden the SLA community experiences compared to the average in the South Coast Air Basin (Basin). These maps were developed using the fifth Multiple Air Toxics Exposure Study (MATES V) and CalEnviroScreen 4.0. MATES V focuses on the carcinogenic risk from exposure to all TACs, including DPM. CalEnviroScreen 4.0 takes into consideration multiple sources of pollution and may include sources that emit DPM. Additionally, Chapter 2d, sections "Chapter 2d Highlights" and "Introduction" state that DPM is the main TAC in SLA.

MATES V focuses on the carcinogenic risk from exposure to TACs, but does not estimate mortality or other health effects from particulate exposures. Additional information on MATES V can be found in Appendix 2a: Community Profile and here: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

Additional information on CalEnviroScreen 4.0 can be found in Appendix 2a and here: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

Response to Comment 1-90

Geographic Distribution Maps

Figures 2d-5 "Examples of Geographic Distribution of Small Facilities in Various Industrial Sectors in SLA", 2d-7 "Examples of Geographic Distribution of Various Areawide Sources in SLA", and 2d-10 "Examples of Geographic Distribution of Off-Road Sources in SLA" are added in Chapter 2d, section "Pollution Sources" to show examples of geographic distribution for: small facilities in various industrial sectors, various areawide sources, and off-road sources. These maps show examples of geographic distribution used to estimate emissions for the SLA community for specific categories of CSC concerns. For example, Figure 2d-5 shows the geographic distribution of emissions for metal parts, plastics, auto body shops, and general industrial facilities, which the CSC has emphasized as air quality concerns.

Stationary and Areawide Sources Maps

Additional figures are added as Figures 2d-15 “ROG Emissions from Stationary Sources in SLA”, 2d-16 “ROG Emissions from Areawide Sources in SLA”, 2d-17 “DPM Emissions from On-Road Sources in SLA in 2019”, and 2d-18 “DPM Emissions from Off-Road Sources in SLA in 2019” in Chapter 2d, section “Emissions by Source Category” to show by source category where emissions are concentrated. The emissions inventory is compiled based on four source categories: facilities (stationary sources), areawide, on-road, and off-road.

Maps are included in Figures 2d-15 and 2d-16 of Chapter 2d to show the geographic distribution of reactive organic gas (ROG) emissions from stationary and areawide sources. ROGs include some TACs like benzene, formaldehyde, and 1,3-butadiene. The data for stationary sources include the facilities that report to Annual Emissions Reporting (AER) and smaller aggregated industrial sources; the location of the large facilities that report to AER are represented by the blue diamonds on the map. Some areas of ROG emissions are concentrated near these AER reporting facilities in SLA; other areas with high ROG emissions are near commercial and industrial activities related to cleaning and surface coatings. Note that reported emissions from AER facilities account for less than one percent of the overall toxicity-weighted TAC emissions in the community. Areawide ROG emissions include emissions from solvent evaporation and miscellaneous processes (e.g., residential fuel combustion, commercial cooking), and in populated areas. The highest areawide ROG emissions occur across populated areas.

On-Road and Off-Road Maps

Figures are added in Chapter 2d for DPM emissions from on-road and off-road sources. The maps in Figures 2d-17 and 2d-18 show higher emissions as areas with darker colors and the data aligns with the CSC’s air quality concerns regarding mobile sources. The highest DPM emissions from on-road sources are along the truck routes and rail corridors; a map of this can be found in Figure A5b-1 "Truck Routes and Rail Corridors in SLA” of Appendix 5b: Mobile Sources in Chapter 2d, section “Community Impacts from Mobile Sources”. Off-road DPM emissions come from a variety of sources, but the highest emissions are near industrial areas or near rail corridors.

Response to Comment 1-91

Figure 2d-1 is added as a map in Chapter 2d, section “Introduction” to show SLA cancer risk in comparison to other areas of the Basin. Additionally, Figure 2d-1 provides a comparison of the average SLA cancer risk under MATES IV and MATES, and the average basin-wide cancer risk under MATES IV and MATES V. See Response to Comment 1-89 for additional information on MATES V. Furthermore, the language in Chapter 2d, section “Toxic Air Contaminants (TACs) Emissions” is revised to further clarify cancer risk.

The cancer risk estimated under MATES is a cumulative cancer risk that accounts for mobile, stationary, and areawide sources. For SLA, the average cancer risk for SLA is 548 chances in a million which is higher than the Basin average of risk 456 chances in a million. Between MATES IV and MATES V, the average cancer risk for SLA decreased almost 59 percent. The highest cancer risk in the Basin is near the ports, with health risks over 900 chances in a million. To provide

additional perspective, under South Coast AQMD's Rule 1402, which establishes cancer risk thresholds for an individual facility, a significant health risk threshold is 100 in a million. The risk threshold in Rule 1402 is for an individual facility and MATES includes all sources within a geographic area.

Response to Comment 1-92

Please see section "Introduction" in Chapter 4: Enforcement Overview and History, for air pollution sources enforced by CARB and South Coast AQMD.

Detailed information on permitted facilities (e.g., auto body shops, general industrial facilities, metal processing facilities, oil and gas industry) can be found in Chapter 4 and the respective Chapter 5 subchapters. Please note for Chapter 2d, oil and gas are included as part of "petroleum production and marketing" and "oil and gas extraction."

Additional information, including images, describing sources of criteria air pollutants (in section "Criteria Air Pollutants") and examples of sources (in section "Pollution Sources") in SLA are added to Chapter 2d. Lead is not described as a criteria air pollutant since it is not a primary pollutant contributing to emissions in this community; however, it is a criteria air pollutant under the Clean Air Act's National Ambient Air Quality Standard (NAAQS). Additional information on U.S. EPA NAAQS and threshold levels is also added in the section "United States Environmental Protection Agency National Ambient Air Quality Air Quality Standards". Volatile Organic Compounds (VOCs) are also known as ROGs, and ROGs are discussed. BTEX includes the following compounds: benzene, toluene, ethylbenzene, and xylene. These compounds are commonly found in petroleum products. Diesel particulate matter or DPM is a carcinogen emitted from diesel-fueled internal combustion engines such as trucks and stationary engines. Benzene and hexavalent chromium are discussed in subsection "Toxic Air Contaminants in South Los Angeles".

Response to Comment 1-93

See Response to Comment 1-86 for emissions inventory methodology.

Instead of the suggested header "Emissions Sources Attribution Background", section "Pollution Sources" is added in Chapter 2d to discuss the four major source categories:

1. facilities (stationary sources),
2. areawide sources,
3. on-road sources, and
4. off-road sources.

Mobile sources include on- and off-road sources. Additionally, examples of pollution sources from each category are included as a figure (see Figures 2d-4 "Air Pollution Sources from Industrial Facilities in SLA", 2d-6 "Areawide Sources of Pollution in SLA", 2d-8 "Examples of On-Road Sources in SLA", and 2d-9 "Examples of Off-Road Sources in SLA", respectively). Figures 2d-5, 2d-7, and 2d-10 are also added to show examples of geographic distribution of small facilities

in various industrial sectors, areawide sources, and off-road sources which are examples of geographic distribution used to estimate emissions.

Additional information is added to clarify that the inventory accounts for all the sources using the best information that is available at this time and it is acknowledged that the data has some inherent uncertainties and limitations.

Chapter 2d, section "Pollution Sources" discusses facilities that report emissions for the AER system, which is an emissions fee billing program, and are only a small fraction of all the emission sources that are accounted for in this program. Table 2d-2 "Emissions from Facilities in SLA Required to Report to AER" (see Chapter 2d, section "Emission from Facilities that Report Their Emissions in AER to South Coast AQMD") show the facilities in SLA that are required to report to AER. The South Coast AQMD works with CARB to estimate emissions from smaller facilities and areawide sources using gas usage data for commercial and residential sources and other information to estimate emissions. Emissions from all sources in SLA are included in Table 2d-3 (see Chapter 2d, subsection "Emissions from All Sources") and broken into the four major source categories.

The emissions inventory for the CERP is developed following the methodology described in the Methodology for Source Attribution Analyses for the first year AB 617 Communities in the South Coast Air Basin (Technical Report), which can be found here: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/source-attribution-methodology.pdf, and is consistent with the methodology used for emission inventories in all other South Coast AQMD AB 617 designated communities. The West Oakland CERP uses emissions inventory and dispersion modeling to determine the impact of regional and local sources on the community. Additionally, the West Oakland CERP states that the community-scale modeling is limited for many sources because of a lack of data on specific locations (i.e., construction emissions, commercial cooking, residential fuel consumption) and is unable to capture approximately 30% of PM2.5 emissions. SLA source apportionment focuses on the development of an emissions inventory of the sources within the community boundary to develop a CERP that focuses on the community. Regional air pollution is addressed under South Coast AQMD's Air Quality Management Plan (AQMP).

Response to Comment 1-94

See Additional information, including images, describing sources of criteria air pollutants (in section "Criteria Air Pollutants") and examples of sources (in section "Pollution Sources") in SLA are added to Chapter 2d. Lead is not described as a criteria air pollutant since it is not a primary pollutant contributing to emissions in this community; however, it is a criteria air pollutant under the Clean Air Act's National Ambient Air Quality Standard (NAAQS). Additional information on U.S. EPA NAAQS and threshold levels is also added in the section "United States Environmental Protection Agency National Ambient Air Quality Air Quality Standards". Volatile Organic Compounds (VOCs) are also known as ROGs, and ROGs are discussed. BTEX includes the following compounds: benzene, toluene, ethylbenzene, and xylene. These compounds are commonly

found in petroleum products. Diesel particulate matter or DPM is a carcinogen emitted from diesel-fueled internal combustion engines such as trucks and stationary engines. Benzene and hexavalent chromium are discussed in subsection "Toxic Air Contaminants in South Los Angeles".

Response to Comment 1-93, a new section "Pollution Sources" is added in Chapter 2d and includes subsection "Mobile Sources".

Response to Comment 1-95

Additional images are added; see Figures 2d-4, 2d-6, 2d-8, and 2d-9 "Examples of Off-Road Sources in SLA" in Chapter 2d, section "Pollution Sources" to show examples of stationary, areawide, and mobile (on- and off- road) sources. Specifically, Figure 2d-4 shows examples of metal processing, surface coatings, auto body, and warehousing. Additionally, Chapter 2d is revised to separate out additional paragraphs to increase readability.

Response to Comment 1-96

See Response to Comment 1-95. Definitions and examples of on- and off-road mobile sources are added (see Figures 2d-8 and 2d-9, respectively) in Chapter 2d. Additional information can be found in Chapter 2d, section "Pollution Sources"; Chapter 4, section "Introduction"; Chapter 5b: Mobile Sources, section "Actions to Reduce Emissions or Exposure"; and Appendix 5b, section "Emissions from Mobile Sources."

Response to Comment 1-97

In Chapter 2d, subsection "Toxic Air Contaminants (TACs) Emissions" is added and includes a summary of TACs, which is emphasized with bullet points. In section "Future Year Baseline Emissions Inventory", In graphical form, Figures 2d-20 "Total Emission Trends for TACs in SLA for 2019, 2026, and 2031" and 2d-21 "TAC Emissions from All Sources in SLA" are added, which provide the trends of TAC emissions for baseline (2019) and milestone years (2026 and 2031) by TAC and by major source category. Figures are also added in Chapter 2d section "Summary" (see Figures 2d-22 "Baseline Emissions Inventory in SLA for 2019" and 2d-23 "Projected Trends in Major Air Pollutants in SLA for 2026 and 2031") to summarize baseline emissions and projected trends for nitrogen oxides (NOX), ROGs, and TACs.

See Response to Comment 1-85 for projected DPM trends from statewide measures. Additional information is added to section "Future Year Baseline Emissions Inventory" to explain decreases in DPM emissions.

Response to Comment 1-98

Language regarding NOx emissions from on- and off-road mobiles sources is moved to Chapter 2d, subsection "Nitrogen Oxides Sources in South Los Angeles".

Response to Comment 1-99

Language regarding ROG emissions from mobiles sources is moved to Chapter 2d, subsection "Reactive Organic Gas Sources in South Los Angeles".

Response to Comment 1-100

Chapter 2d was revised to include a section for each major category (see section "Pollution Sources") and each criteria air pollutant source in SLA (see section "Criteria Air Pollutants"). Additionally, section "Toxic Air Contaminant (TAC) Emissions" is included.

The title of this section is renamed to "Baseline Emissions Inventory (Year 2019)". Please see Response to Comment 1-85 for explanation of baseline years.

Response to Comment 1-101

Portions of this language is incorporated in Chapter 2d, subsection "Nitrogen Oxides (NOx)".

Response to Comment 1-102

See Response to Comment 1-93. Instead of the header "Stationary Sources Emissions Attribution", a subsection "Facilities (Stationary Sources)" is added in Chapter 2d.

Response to Comment 1-103

See Additional information, including images, describing sources of criteria air pollutants (in section "Criteria Air Pollutants") and examples of sources (in section "Pollution Sources") in SLA are added to Chapter 2d. Lead is not described as a criteria air pollutant since it is not a primary pollutant contributing to emissions in this community; however, it is a criteria air pollutant under the Clean Air Act's National Ambient Air Quality Standard (NAAQS). Additional information on U.S. EPA NAAQS and threshold levels is also added in the section "United States Environmental Protection Agency National Ambient Air Quality Air Quality Standards". Volatile Organic Compounds (VOCs) are also known as ROGs, and ROGs are discussed. BTEX includes the following compounds: benzene, toluene, ethylbenzene, and xylene. These compounds are commonly found in petroleum products. Diesel particulate matter or DPM is a carcinogen emitted from diesel-fueled internal combustion engines such as trucks and stationary engines. Benzene and hexavalent chromium are discussed in subsection "Toxic Air Contaminants in South Los Angeles".

Response to Comment 1-93. Subsection "Areawide Sources" is added in Chapter 2d.

Response to Comment 1-104

See Additional information, including images, describing sources of criteria air pollutants (in section "Criteria Air Pollutants") and examples of sources (in section "Pollution Sources") in SLA are added to Chapter 2d. Lead is not described as a criteria air pollutant since it is not a primary pollutant contributing to emissions in this community; however, it is a criteria air pollutant under the Clean Air Act's National Ambient Air Quality Standard (NAAQS). Additional information on U.S. EPA NAAQS and threshold levels is also added in the section "United States Environmental Protection Agency National Ambient Air Quality Air Quality Standards". Volatile Organic Compounds (VOCs) are also known as ROGs, and ROGs are discussed. BTEX includes the following compounds: benzene, toluene, ethylbenzene, and xylene. These compounds are commonly found in petroleum products. Diesel particulate matter or DPM is a carcinogen emitted from diesel-fueled internal combustion engines such as trucks and stationary engines. Benzene and hexavalent chromium are discussed in subsection "Toxic Air Contaminants in South Los Angeles".

Response to Comment 1-93. Images of examples of each major source category are included in section "Pollution Sources" in Chapter 2d.

Response to Comments 1-105, 106, and 107

These pie charts are converted to bar graphs in Chapter 2d. Figures 2d-11 "Contribution of Major Source Categories to NOx Emissions in SLA in 2019 (see section "Nitrogen Oxides Sources in South Los Angeles"), 2d-12 "Contribution of Major Source Categories to ROG Emissions in SLA in 2019" (see section "Reactive Organic Gas Sources in South Los Angeles"), and 2d-13 "Contribution of Major Source Categories to PM2.5 Emissions in SLA in 2019" (see section "Fine Particulate Matter (PM2.5) Sources in South Los Angeles") show the contribution of major source categories to NOx, ROG, and PM2.5 emissions**,** respectively, in the SLA community**.**

In Chapter 2d, section "Future Year Baseline Emissions Inventory", Figure 2d-19 "Total Emission Trends for NOx, ROG, and PM2.5 in SLA for 2019, 2016, and 2031" includes total emission trends for ROGs, NOx, and PM2.5 in SLA for 2019, 2026, and 2031. A side-by-side comparison between different criteria air pollutants would not be an informative comparison because each pollutant has a separate baseline emission.

Response to Comment 1-108

In Chapter 2d, a map (see Figure 2d-5 in subsection "Facilities (Stationary Sources)") of the geographic distribution of small facilities, including auto body shops, is added. Additional information on auto body shops, including a map of the permitted auto body shops can be found in Chapter 5c: Auto Body Shops and Appendix 5c: Auto Body Shops.

Response to Comment 1-109

The proposed header and section "Toxic Air Contaminant (TAC) Emissions" is added in Chapter 2d.

Response to Comment 1-110

See Response to Comments Response to Comment 1-86, Response to Comment 1-90, and Additional information, including images, describing sources of criteria air pollutants (in section "Criteria Air Pollutants") and examples of sources (in section "Pollution Sources") in SLA are added to Chapter 2d. Lead is not described as a criteria air pollutant since it is not a primary pollutant contributing to emissions in this community; however, it is a criteria air pollutant under the Clean Air Act's National Ambient Air Quality Standard (NAAQS). Additional information on U.S. EPA NAAQS and threshold levels is also added in the section "United States Environmental Protection Agency National Ambient Air Quality Air Quality Standards". Volatile Organic Compounds (VOCs) are also known as ROGs, and ROGs are discussed. BTEX includes the following compounds: benzene, toluene, ethylbenzene, and xylene. These compounds are commonly found in petroleum products. Diesel particulate matter or DPM is a carcinogen emitted from diesel-fueled internal combustion engines such as trucks and stationary engines. Benzene and hexavalent chromium are discussed in subsection "Toxic Air Contaminants in South Los Angeles".

Response to Comment 1-93. South Coast AQMD will provide updates to the CSC on emission reductions achieved during CERP implementation.

Response to Comment 1-111

The language is removed, and additional language is added in Chapter 2d, section “Toxic Air Contaminant (TAC) Emissions” to clarify.

Response to Comment 1-112

The language is clarified in Chapter 2d, subsection “Facilities (Stationary Sources)”. Additional information about the AER program is included in Chapter 2d, subsection “Facility (Stationary Sources)” and Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts, section “Annual Emissions Reporting.” Information regarding the Assembly Bill 2588 (AB 2588) Program is in section “Toxic Air Contaminants (TACs) Emissions”. Additional information on the AB 2588 Program is included in: Appendix 2a, section "Key Stationary Sources"; Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts, section “South Coast AQMD Regulatory Program” and section “South Coast AQMD Ongoing Efforts”, subsection "AB 2588 Program"; Appendix 5d: General Industrial Facilities, section "Regulatory Authority", subsection “South Coast AQMD”; Appendix 5e: Metal Processing Facilities, section “Regulatory Authority”, subsection "State and Federal Actions"; and Appendix 5f: Oil and Gas Industry, section “Regulatory Efforts”, subsection "State Actions.”

Response to Comment 1-113

The language is removed from Chapter 2d.

Response to Comment 1-114

See Response to Comment 1-86 on Methodology for Source Attribution Analyses for the first year AB 617 Communities in the South Coast Air Basin (Technical Report). Chapter 2d is a summary of the emissions data for the SLA community. The Technical Report includes additional details on how emissions are estimated. It can be found here: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/source-attribution-methodology.pdf.

Response to Comments 1-115

This language is removed from Chapter 2d. A more concise explanation is provided in subsection “Cancer and Non-Cancer Risk”.

Response to Comments 1-116 and 1-117

See Response to Comment 1-91 and Response to Comment 1-95. Information and language on TACs in Chapter 2d is revised for clarification and to improve readability; additionally, section “Toxic Air Contaminant (TAC) Emissions” is included.

Response to Comment 1-118

This figure is changed and renumbered to Figure 2d-14 “Contribution of Major Source Categories to TAC Emissions in SLA” (previously Figure 3b-4), in section “Toxic Air Contaminants (TACs) Emissions”.

Response to Comment 1-119

The header "Future Year Emissions Inventory and Source Attribution" in Chapter 2d is changed to "Future Year Baseline Emissions Inventory" for clarification. This section refers to the future emissions of criteria air pollutants and TACs in SLA that are projected using the best available information based on population growth, economic growth, and emissions adjustments that reflect the ongoing implementation of existing regulations. The estimates do not reflect the potential impact of any new programs or measures not yet approved, and/or included in the CERP. Additional information on emission reduction targets can be found in Chapter 5a.

Response to Comment 1-120

Language regarding the REgional CLean Air Incentives Market (RECLAIM) program is revised for clarification (see section "Future Year Baseline Emissions Inventory" in Chapter 2d). See Appendix 5a for additional information regarding the RECLAIM program and RECLAIM facilities.

Response to Comment 1-121

Language is clarified in Chapter 2d, section "Future Years Baseline Emissions Inventory". ROG emissions are expected to decrease between the years 2019 and 2031, mostly due to reduced emissions from cleaner vehicles. Unlike NOx and ROG emissions, PM2.5 emissions remain virtually unchanged from 2019 to 2031. While some sources of PM2.5, (e.g., on- and off-road vehicles) are expected to decline due to vehicle emissions regulations, other sources that are not regulated~~,~~ (e.g., road dust, construction dust, cooking) are expected to increase because their emissions are strongly related to population, and population is projected to increase.

Response to Comment 1-122

Language is added to explain that DPM is expected to decrease by 61 percent from 2019 through 2031 due to existing diesel vehicle emission regulations and turnover from older, higher polluting vehicles to cleaner vehicles (see Chapter 2d, section "Future Year Baseline Emissions Inventory").

Response to Comment 1-123

Language is added to explain that 1,3 butadiene emissions are anticipated to decrease due to existing vehicle regulations and turnover from older, higher polluting vehicles to cleaner vehicles (see Chapter 2d, section "Future Year Baseline Emissions Inventory").

Response to Comment 1-124

Language is added to explain benzene and formaldehyde emissions are also expected to decrease throughout the 12-year period due to overall emission reductions from vehicles resulting from ongoing implementation of existing vehicle emission regulations and turnover from older, higher polluting vehicles~~-~~to cleaner vehicles (see Chapter 2d, section "Future Year Baseline Emissions Inventory").

Response to Comment 1-125

Language is added to clarify that hexavalent chromium emissions are expected to decrease from 2019 to 2031 due to a decrease in vehicle emissions despite emission increases from industrial activities (see Chapter 2d, section "Future Year Baseline Emissions Inventory").

Response to Comment 1-126

Footnotes with the title and webpages for the rules are added and a further explanation can be found in Appendix 5e.

Response to Comment 1-127

Language is changed for clarification (see Chapter 2d, section "Future Year Baseline Emissions Inventory"). A new header is not added as this discussion is a continuation of the previous language.

Response to Comment 1-128

Figure 2d-19 (previously Figure 3b-5) is revised and emissions are included in the bars (see Chapter 2d, section "Future Year Baseline Emissions Inventory").

Response to Comment 1-129

Language is corrected for the grammatical error (see Chapter 2d, section "Future Year Baseline Emissions Inventory").

Response to Comment 1-130

See Response to Comment 1-93.

Response to Comment 1-131

Language is edited and also added to Chapter 2d, section "Chapter 2d Highlights".

Response to Comments 1-132 and 1-133

In Chapter 2d, Figure 2d-5, in subsection "Facilities (Stationary Sources)", is added to illustrate the geographic distribution of small facilities for the following industrial sectors in the SLA community: metal parts (processing), plastic production, auto body shops, and general industrial facilities. Additional information on metal processing facilities can be found in Chapter 5e: Metal Processing Facilities and Appendix 5e: Metal Processing Facilities.

Response to Comment 1-134

Future NOx emission reductions from statewide measures are quantified in Chapter 5a. Reductions from ongoing implementation of existing regulations and incentive programs are incorporated as part of the future baseline emissions. NOx emissions from RECLAIM facilities are decreasing as these facilities implement command-and-control rules with Best Available Retrofit Control Technology (BARCT) NOx limits while in RECLAIM. To date, a total of twelve rules have been adopted or amended which will result in 13.38 tons per day of NOx emissions reductions are expected from RECLAIM facilities. Additional rules applicable to BARCT are being evaluated and amended, and additional information on the status can be found here: http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/regulation-xx . As part of the rule amendment process, resulting emission reductions from these rules will be quantified, but cannot be determined at this time. Please note many non-RECLAIM facilities within the community have equipment and processes that are regulated by South Coast AQMD rules, resulting in additional emission reductions. See Appendix 2a:

Community Profile, section "Best Available Retrofit Control Technologies Requirement", Table A2a-3 "List of NOx RECLAIM Facilities within the SLA Community" in Appendix 2a for the list of RECLAIM facilities within the SLA community. Additional NOx emissions reductions will result from the CERP actions but cannot be quantified at this time. For example, enhanced enforcement at facilities and CSC-identified locations and outreach to facility owners and operators on best management practices may result in emissions reductions; however, those reductions cannot be quantified at this time. Please see Response to Comment 1-17 regarding CSC updates on emissions reductions achieved.

Chapter 4: Enforcement Overview and History

Response to Comment 1-135

Additional language regarding the inspection process, Notice of Violations (NOVs), Notices to Comply (NCs), and the enforcement process are included throughout Chapter 4: Enforcement Overview and History and Appendix 4: Enforcement Overview and History.

Response to Comment 1-136

See Response to Comment 1-135 . Additionally, language regarding NOVs and NCs resulting from these inspections is added and the language regarding CARB and South AQMD designing their programs to be most effective is removed.

Response to Comments 1-137 through 1-140

Table 4-1 "Sources Enforced by CARB and South Coast AQMD" is added in Chapter 4 to clarify regulatory authority between South Coast AQMD and CARB. Section "Enforcement Overview" is added in Chapter 4 to explain the overall goal and history of South Coast AQMD's enforcement program and includes requested information. Table 4-2 "South Coast AQMD Summary of Enforcement Activities by Community Concern from 2018 through 2021" is included in Chapter 4 and provides the permitted sources (number of facilities), inspections, and NOVs and NCs. Additional information on enforcement background can be found in Appendix 4 in subsection "South Coast Air Quality Management District Compliance and Enforcement Program Structure".

Information on CARB's enforcement efforts is in section "CARB Enforcement Activity in South Los Angeles" in Chapter 4.

Response to Comment 1-141

Additional language regarding complaints and inspections and further explanation of Table 4-2 is added in Chapter 4 in section "Enforcement Overview." This language includes an explanation of inspection rates.

Response to Comment 1-142

Additional language regarding the importance of receiving complaints from the community is added to section "Public Complaints".

Response to Comment 1-143

Air quality complaints are made for many reasons that include, but are not limited to, any injury, detriment, nuisance, or annoyance occurring, as a result of air contaminants or other materials (e.g., smoke, dust, or odors). While the term “complaint” may have a negative connotation, it is a standard South Coast AQMD term and all complaints received are important for the inspection and enforcement process and enable members of the public to play an active role in addressing air pollution concerns in their community. This section was renamed "Public Complaints" to highlight the importance of the role which the SLA community has in filing air quality complaints to help South Coast AQMD address potential air quality violations.

Response to Comment 1-144

The column title is revised from “Amount” to “Public Complaints.”

Response to Comment 1-145

Language is added to further explain Table 4-3 “Summary of Public Complaints Received in SLA and Surrounding Nearby Communities”. See Response to Comment 1-141 regarding number of inspection rates.

Response to Comment 1-146

See Response to Comment 1-141. Clarifying language regarding inspection practices as they relate to public complaints is added.

Response to Comment 1-147

Clarifying language regarding public complaints and large odor events is added in section “Public Complaints”.

Response to Comment 1-148

This language is included to provide information on South Coast AQMD and CARB’s complaint system and the importance of and process for making public complaints. Additional language regarding South Coast AQMD’s process for handling public complaints is added in the “Public Complaints” section of Chapter 4, see Response to Comments1-141, Response to Comment 1-142, Response to Comment 1-143, and Response to Comment 1-144.

CARB will conduct an activity or solicit input through the CSC’s contacts in the community to collect feedback on CARB’s complaint filing system during implementation of Chapter 5b: Mobile Sources, Goal C: CARB Efforts (see Table 5b-1 "Actions to Reduce Emissions from and Exposure to Mobile Sources").

South Coast AQMD will work with the CSC regarding concerns related to South Coast AQMD’s complaint system during implementation of Chapter 5d: General Industrial Facilities, Goal E: F.I.N.D. Tool and Filing Complaints (see Table 5d-1 “Actions to Reduce Emissions from and Exposure to General Industrial Facilities”). The efforts from Goal E in Chapter 5d will translate across all air quality priority actions since it is related to filing air quality complaints. Additionally,

South Coast AQMD released a new version of the South Coast AQMD mobile application, which allows users to directly file and track complaints on a mobile device.

Response to Comment 1-149

Images of examples of equipment at oil and gas facilities is added in Figure 4-4 “Examples of Equipment at Oil and Gas Facilities.”

Response to Comment 1-150

The formatting is revised to make this language stand out.

Response to Comment 1-151

Images of examples of equipment at general industrial facilities are added in Figure 4-7 “Examples of General Industrial Facility Equipment.”

Response to Comment 1-152

Figure 4-10 “Map of General Industrial Manufacturing Category in SLA” is added to accompany Figure 4-9 “Breakdown of General Industrial Manufacturing Category in SLA” (previously Figure 4-6).

Response to Comment 1-153

The original pie chart in Figure 4-12 “Distribution of Metals Facility Types in SLA” (previously Figure 4-8) is revised to a bar graph. Additional information on the distribution of metals facility types in SLA and industry description based on North American Industry Classification System (NAICS) codes can be found in Appendix 5e: Metal Processing Facilities, Table A5e-1 "NAICS Descriptions and Number of Facilities for SLA Metals Facility Types" in section "Community Impacts from Metal Processing Facilities.” Additionally, a map of metal processing facilities in SLA is included in Chapter 5e: Metal Processing Facilities (Figure 5e-1 “Metal Processing Facilities in SLA”).

Response to Comment 1-154

The formatting is revised to make this language stand out.

Response to Comment 1-155

The formatting is revised to make this language stand out. Additional language regarding inspection practices is added.

Response to Comment 1-156

The formatting is revised and is now bulleted.

Response to Comment 1-157 and 158

Additional language regarding South Coast AQMD Rule 402 –Nuisance and odor complaints is added in Chapter 4 Section “Auto Body Shops.”

Response to Comment 1-159

The formatting is revised and is now bulleted.

Response to Comment 1-160

This section is revised to divide the larger paragraph into two sections.

Response to Comment 1-161

The formatting is revised to have the language on its own.

Response to Comment 1-162

Additional language regarding report backs is added in section “Oil and Gas”.

Response to Comment 1-163

Additional language regarding data gaps is added in section “Enforcement Considerations”.

Response to Comment 1-164

Figure 4-1 “Inspection Process” is added as a visual representation of the inspection process and provides clarification on enforcement actions resulting from inspections for facilities found to be out of compliance. This language is moved to section "Enforcement Overview" and additional language is added to clarify enforcement actions resulting from inspections for facilities found to be out of compliance.

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution

Response to Comment 1-165

The formatting is revised and is now bulleted. Figure 5a-1 “Air Quality Priorities Identified by the SLA CSC” is added to show images of the air quality priorities.

Response to Comment 1-166

This language is revised to add “in collaboration with” to clarify that the implementation process will be a collaborative effort. Additionally, the CSC has requested that the community be involved in CERP implementation and suggested that agencies work with community-based organizations. South Coast AQMD strives to ensure ongoing and meaningful engagement and partnerships with community members.

Response to Comment 1-167

The formatting is revised to make this language stand out.

Response to Comment 1-168

The section title is changed to “Authority (Jurisdiction) of Governmental Agencies and Ongoing Efforts.”

Response to Comment 1-169

A hierarchical graph may not clarify the roles of these different agencies as there may be some overlapping authority. Table 4-1 “Sources Enforced by CARB and South Coast AQMD” is added to Chapter 4: Enforcement Overview and History to summarize which sources (e.g., mobile, stationary, area-wide, indirect, greenhouse gases) are regulated by CARB and South Coast AQMD enforcement relating to mobile and stationary sources. This CERP discusses regulatory authority of governmental agencies by air quality priority and more information can be found in their

respective Chapter 5 subchapters (Chapters 5b-5f) in section "Regulatory Background" and their respective Chapter 5 appendices (Appendices 5b-5f) in section "Regulatory Efforts."

Response to Comment 1-170

This language is deleted and staff provided clarification that each agency develops, implements, and enforces rules and regulations for sources under their authority.

Response to Comments 1-171, 1-172, and 1-173

Language is added to further explain BARCT and how it relates to AB 617, RECLAIM, and the RECLAIM transition. More information on BARCT, RECLAIM, and rule developments can be found in Appendix 2a: Community Profile Section "Best Available Retrofit Control Technologies Requirement" and 5a: South Coast AQMD Regulatory Program and Ongoing Efforts sections "Regulation XX – REgional CLean Air Incentives Market" and "Technology Clearinghouse. Language regarding the number of RECLAIM facilities is moved to Appendix 2a, which also lists the RECLAIM facilities (Table A2a-3 "List of NOx RECLAIM Facilities within the SLA Community").

Response to Comment 1-174

Tables for each air quality priority identifying this information are located in their respective Chapter 5 subchapters, e.g., Table 5b-1 "Actions to Reduce Emissions from and Exposure to Mobile Sources" in Chapter 5b: Mobile sources.

Response to Comment 1-175

As this CERP is implemented, South Coast AQMD will work with the community, CSC, and community co-leads on details of these community projects to support the community. Language is added to Chapter 5a to expand on CAP incentive funds and community-identified projects.

In addition to working with the CSC during implementation to ensure the program is community driven, several actions specifically list the CSC as a responsible entity, as listed in **Table A8-3**.

Table A8-3: Actions Listing CSC as a Responsible Entity

Chapter	Goal
5b: Mobile Sources	B: Reduce Exposure at Schools
	D: Mobile Source Incentives
5c: Auto Body Shops	B: Identify Facilities of Concern
	D: Outreach to Owners and Operators
5d: General Industrial Facilities	A: Identify Facilities of Concern
	C: Dry Cleaners
	G: Construction Sites Enforcement
5e: Metal Processing Facilities	C: Identify Strategies
	F: Outreach to Owners and Operators

Response to Comment 1-176

Table 5a-1 "CERP Emissions Reduction Targets" is updated and includes estimated emission reduction targets in tons per year and percentages in the Final CERP.

Response to Comment 1-177

Language is added to Chapter 5a section "Estimated Emissions Reductions from California Air Resources Board Statewide Measures" to further explain CARB's estimated emissions reductions.

Response to Comment 1-178

See Response to Comment 1-176.

Chapter 5b: Mobile Sources

Response to Comment 1-179

In Chapter 5b: Mobile Sources, mobile sources and neighborhood traffic are included as concerns under this air quality priority. Therefore, neighborhood traffic will remain in Chapter 5b, section "Community Concerns" rather than a separate subchapter.

Response to Comment 1-180

Language is added in Chapter 5b, Chapter 4: Enforcement Overview and History, and Appendix 5b: Mobile Sources to provide more information related to the compliance and inspection program for idling trucks. Examples of mobile sources are included in Chapter 5b, section "Community Concerns" (see Figure 5b-1 "Examples of Mobile Sources"), Appendix 5b, section "Emissions from Mobile Sources" (see Figures A5b-5 "Examples of Off-Road Equipment" and A5b-6 "Examples of Portable Off-Road Equipment (PERP)", and Chapter 2d: Emissions and Source Attribution, section "Mobile Sources" (see Figures 2d-8 "Examples of On-Road Sources in SLA",

and 2d-9 “Examples of Off-Road Sources in SLA”). Mobile sources include on- and off-road sources. Additionally, language is added to include ice-cream trucks and clarification on existing mobile source inspection programs and rules and regulations as community concerns.

Land use agencies such as the City and County have authority to designate truck routes that impact neighborhood traffic. Although, CARB and South Coast AQMD do not have authority to regulate neighborhood traffic nor designate truck routes, in Chapter 5b, Goal F: Agency Collaboration (see Table 5b-1 “Actions to Reduce Emissions from and Exposure to Mobile Sources”) is added to address designated truck routes through collaboration with local agencies. South Coast AQMD and CARB commit to collaborate with and make enforcement referrals to local agencies to address the CSC’s concerns related to enforcement of truck routes and the proximity to sensitive receptors through implementation of Goal F.

Response to Comment 1-181

The proposed language regarding the community's concerns of mobile source regulations and compliance inspections, with edits, is added to section “Community Concerns” in Chapter 5b.

Response to Comment 1-182

Chapter 5b, Goal D: Mobile Source Incentives includes the following actions: explore opportunities for incentive funds for cleaner mobile source technologies; and conduct outreach when new funding opportunities are available to incentivize replacing older, higher polluting on-road and off-road equipment with cleaner technology. South Coast AQMD will explore opportunities for incentive funds and conduct outreach for these opportunities. A potential opportunity is through the Community Air Protection (CAP, also known as Community Air Protection Program (CAPP) at South Coast AQMD) incentive funds. These funds can be allocated toward community-identified projects such as providing incentives to mobile source technologies. If the CSC decides to allocate incentive funds to reduce emissions from trucks for small businesses and vendors, South Coast AQMD will work with the CSC and within the framework of CARB’s Community Air Protection (CAP) Incentives 2019 Guidelines (CAP Guidelines, also known as CAPP Guidelines at South Coast AQMD, can be found here: https://ww2.arb.ca.gov/resources/documents/community-air-protection-incentives-guidelines) to develop a community-identified AB 617 project plan. It is important to note, CAPP incentive funds can only be used for projects supported by an adopted CERP. Additional information on incentives may be found in Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts, section “Incentives”.

Response to Comment 1-183

Images of different types of mobile sources are added to Chapter 5b, Figure 5b-1 “Examples of Mobile Sources”. Additional images of mobile source examples may be found in Appendix 5b (see Figures A5b-5 “Examples of Off-Road Equipment” and A5b-6 “Examples of Portable Off-Road Equipment (PERP)” and Chapter 2d, section “Mobile Sources” (see Figures 2d-8 “Examples of On-Road Sources in SLA”, and 2d-9 “Examples of Off-Road Sources in SLA”). Mobile sources include on- and off-road sources.

Response to Comment 1-184

Language is added to clarify that the community is concerned about California Environmental Quality Act (CEQA) exemptions at construction sites and is moved to Chapter 5d: General Industrial Facilities. South Coast AQMD Rule 403 establishes requirements to minimize fugitive PM emissions from construction sites. Additionally, CEQA requires state and local agencies to identify and reduce the environmental impacts of future development projects that may produce emissions during construction. Through the CEQA process, South Coast AQMD can provide technical expertise and recommendations to mitigate air quality impacts. South Coast AQMD has a robust Intergovernmental Review (IGR) program, where CEQA documents are reviewed and South Coast AQMD may provide comments focused on adequacy of air quality analyses. South Coast AQMD CEQA comments are meant as guidance for lead agencies, including local land use agencies or entities, to ensure a reasonable air quality analysis is conducted to estimate air quality impacts, and significant air quality impacts are mitigated to the extent feasible. The lead agency is the public agency that has the primary responsibility for carrying out a project, has discretionary authority over the proposed project, and responsible for preparing the appropriate CEQA document. In the CEQA document, the lead agency is responsible for identifying air quality impacts from construction and operation, including estimating construction emissions. CEQA environmental analyses are also available to community members at https://ceqanet.opr.ca.gov/. Local land use agencies often consult with South Coast AQMD staff during preparation of an environmental analysis and staff provides mitigation measures to ensure they are incorporated into projects early in the development process. Regarding construction equipment, it is the South Coast AQMD staff's practice when commenting on environmental documents under CEQA to recommend that operators use the cleanest available construction equipment. During CERP implementation of Chapter 5d, Goal G: Construction Sites Enforcement, South Coast AQMD will work with the CSC to identify construction site locations of concern to focus enforcement efforts and CARB and South Coast AQMD will present an overview of rules that may be applicable and how construction sites are regulated. Lastly, the Draft 2022 South Coast Air Quality Management Plan (AQMP) includes a control measure EGM-03: Emission Reductions from Clean Construction Policy which seeks to ensure operators are using the cleanest construction equipment.

Response to Comment 1-185

In Chapter 5b, section "Community Concerns", the language is revised to add the Slauson Corridor as a heavily trafficked transportation route.

Response to Comment 1-186

A map with truck routes and rail corridors is added to Appendix 5b as Figure A5b-1 "Truck Routes and Rail Corridors in SLA".

Response to Comment 1-187

Businesses and industries are added as entities that are to be informed of CARB's mobile source regulations, best management practices, how to file a complaint, and incentive programs in Chapter 5b, Goal C: CARB Efforts.

Response to Comment 1-188

Ice cream and food trucks tend to be gasoline powered, weigh less than the commercial trucks and buses, and also have smaller engines. The emissions associated with these vehicles are therefore very small compared to larger vehicles, and they also do not emit diesel particulate matter (DPM), a toxic air contaminant. Commercial trucks and buses are regulated by CARB through its heavy-duty diesel vehicle regulations (e.g., regulations applicable to diesel-fueled vehicles greater than 14,000 pounds Gross Vehicle Weight Rating). CARB's Blueprint states that CERPs will focus on reducing toxic air contaminant emissions, such as DPM. Therefore, mobile source projects prioritized by other CSCs have been diesel fueled, as they are eligible for incentive funds through CAP Guidelines. Ice cream trucks may be eligible for incentives depending on the vehicle class and type of fuel used to power the vehicle. Additional information on Incentives may be found in Appendix 5a, section "Incentives".

Response to Comment 1-189

The intent of this action will result in increased enforcement at CSC-identified locations during CERP implementation. South Coast AQMD is committed to enforcing CARB's "No Idling" regulation as described in Chapter 5b, Goal A (see Table 5b-1) and CARB is committed to enforcing its regulations (e.g., Truck and Bus, "No Idling") as described in Chapter 5b, Goal C: CARB Efforts (see Table 5b-1); South Coast AQMD and CARB will focus enforcement based on the CSC-identified locations of concern. During CERP implementation, CARB and South Coast AQMD will work with the CSC to identify and prioritize locations of concern for enforcing mobile source regulations (where CARB and South Coast AQMD have authority to do so). Implementation of this action will include asking the CSC to note the time, which may include times outside of South Coast AQMD's normal business hours, and locations where idling is observed. South Coast AQMD idling sweep inspections will be conducted unannounced and on an irregular schedule at the CSC-identified locations of concern to ensure that truck drivers are not aware of when inspectors will be in the area. These sweeps are conducted to implement the CERP actions and separate from complaint response, which is in addition to any planned sweeps.

CARB has authority over mobile sources and conducts a variety of inspections related to diesel trucks, including idling inspections. CARB's "No Idling" regulation explicitly authorizes enforcement by South Coast AQMD. Therefore, idling inspections do not require assistance from local law enforcement and language regarding coordination with local law enforcement is not added. This language is revised to change "truck and bus inspections" to "idling sweep inspections" in order to clarify that the inspections conducted by South Coast AQMD are specifically for idling and the current language already specifies that the inspection will occur at "locations of concern identified by the CSC." For South Coast AQMD enforcement, truck drivers

issued a Notice of Violation (NOV) are held accountable through penalties or fines that are imposed on them through a legal settlement; these penalties or fines may increase for repeat violators. Additional information regarding penalties is included in Appendix 4: Enforcement Overview and History.

For CARB enforcement, truck owners and truck drivers that violate CARB regulations are held accountable through CARB's field enforcement efforts that include roaming enforcement, roadside enforcement with California Highway Patrol, and truck company audits. CARB may also work with the California Department of Motor Vehicle to implement a registration hold process, pursuant to Senate Bill 1 (SB 1) – Road Repair and Accountability Act of 2017, , which ensures compliance with the Truck and Bus rule and holds truck owners and operators accountable. CARB works with truck owners and truck drivers to bring them into compliance through these enforcement efforts. CARB may share this information to the CSC as requested to explain the enforcement process and how CARB holds truck owners and operators responsible for violating CARB regulations.

Response to Comments 1-190 and 1-191

South Coast AQMD is committed to implementing and enforcing Coast AQMD Rule 2305 — Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. In Chapter 5b, an action in Goal A is added for South Coast AQMD to report annually to the CSC on Rule 2305 implementation and enforcement. South Coast AQMD will work with the CSC to determine feasibility of obtaining feedback from warehouses to indicate their understanding of the rule and support needed for rule compliance (e.g., feedback form, sign up commitment, survey); some operators or owners may be reluctant to share certain information.

Response to Comments 1-192 and 1-193

In Chapter 5b, this action has been moved from Goal A: Warehouses and Idling into Goal C: CARB Efforts (see Table 5b-1) to focus CARB's CERP commitments in one goal. As part of the outreach process, South Coast AQMD and CARB can include outreach to truck unions and may seek assistance from the CSC and community co-leads to connect with truck unions. CARB initiated outreach efforts by working with the California Metals' Coalition and other communities. CARB is also willing to encourage voluntary "Good Neighbor" anti-idling policies. Regarding creating feedback forms to assess ease of use or concerns with CARB's complaint filing system, this metric is moved and an action is added to Chapter 5b, Goal C (see Table 5b-1). CARB will conduct an activity or solicit input through the CSC's contacts in the community to collect feedback on CARB's complaint filing system. Although CARB cannot commit to the requested metric "number of feedback forms" since oftentimes CARB receives very little feedback, a metric has been added to reflect updates regarding feedback received and potential improvements to CARB's complaint filing system. See Response to Comment 1-148 for information on developing improvements to CARB's and South Coast AQMD's complaint systems.

Response to Comment 1-194

The proposed language of "create 'Children Breathing No Idling Zones' for schools" is not included. CARB's "No Idling" regulation establishes restricted areas, which is defined by CARB to include "individual or multifamily housing units, schools, hotels, motels, hospitals, senior care facilities, or childcare facilities, that has one or more of such units on it", where idling is not allowed. Zoning policies for No Idling near schools is the jurisdiction of each school or their school district, who may enforce the No Idling zone as a policy for their school.

Approval for signs and the language on those signs are the authority of Caltrans. Signs currently approved by Caltrans reference CARB's Regulation 2450 (also referred to as the "No Idling" regulation). This regulation does not distinguish demographics, therefore "Children Breathing No Idling Zones" would be separate from the "No Idling" regulation and such a zone would have to be created with the approval of the school districts. Additional conversations with school districts are required to determine feasibility, potential support, and approval to install signs stating "Children Breathing No Idling Zones" on school property. If the school district agrees, then the CSC and South Coast AQMD would need to identify a funding mechanism to support creation of these requested signs.

The CSC may prioritize idling sweeps and compliance inspections near schools as CSC-identified locations of concern during implementation of Chapter 5b, Goals A: Warehouses and Idling and C (See Table 5b-1).

Response to Comments 1-195 through 1-197

See Response to Comment 1-189.

Response to Comment 1-198

The proposed language referencing coordination with California Highway Patrol is not included because CARB's inspection process already includes collaborating with the California Highway Patrol, if necessary.

Response to Comment 1-199

Language regarding CARB adjusting its enforcement strategy is added, with edits, in Chapter 5b, Goal C (see Table 5b-1). Additionally, CARB will report back to the CSC annually for future adjustments. Time permitting, CARB may present on their enforcement efforts in the community more frequently and to solicit input for adjusting enforcement at those times, as requested by the CSC.

Response to Comment 1-200

Retrofitting School Buses

"Buses" is added in Chapter 5b, Goal D: Mobile Source Incentives as an example of mobile sources that could receive incentives funds for "cleaner mobile source technologies. Appendix 5b, section "Incentives" includes information on incentive programs for school buses.

Additionally, South Coast AQMD administers the Lower-Emission School Bus Program to replace diesel public school buses. The program replaces diesel school buses with zero-emission or near-zero emission alternative fuel buses which will reduce children's exposure to toxic DPM emissions. The program also funds alternative fueling or charging infrastructure and on-board compressed natural gas (CNG) tank replacement. For more information about the Lower-Emission School Bus Program, please refer to https://www.aqmd.gov/home/programs/business/lower-emission-school-bus-program.

South Coast AQMD encourages applicants of the Lower-Emission School Bus Program to help offset the cost of zero-emission school buses by applying for funding through the California Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) which provides point of sale vouchers to make zero- and near-zero emission vehicles more affordable. For more information about the HVIP Program, please refer to https://californiahvip.org/.

Further, the U.S. EPA recently initiated a new Clean School Bus Program to provide five billion dollars over the course of five years (Fiscal Year 2022-2026) to replace existing school buses with clean and zero-emission models. U.S. EPA is accepting applications for Clean School Bus Rebates from May 2022 to August 2022. For information about the Clean School Bus Program, please refer to https://www.epa.gov/cleanschoolbus.

School Air Filtration Systems

School air filtration systems are one of the ways the CERP will reduce students' exposure to mobile sources in the classroom. The CSC specifically requested school air filtration systems with high Minimum Efficiency Reporting Value (MERV) ratings be installed in classrooms. Action B: Reduce Exposure at Schools in Chapter 5b is included to reduce children's exposure to air pollution while they are in classrooms. School air filtration systems will reduce children's exposure to DPM and ultrafine particles while in the classroom. These air filtration systems can remove up to 90 percent of ultrafine particles (for more information, please refer to http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf.
Health studies show that PM2.5 and ultrafine particles, including DPM, present the greatest air pollution health risk to sensitive receptors in environmental justice communities. For more information, please refer to https://www.aqmd.gov/home/research/publications/jan-feb-2021/school-air-filtration.

Additional Exposure Reduction at Schools

An action is added to Goal B, in Chapter 5b, requiring the South Coast AQMD to work with local school districts and CSC to support community projects that reduce students' exposure to air pollution (e.g., Safer Routes to Schools program).

In Chapter 5b, Goals A: Warehouses and Idling, C: CARB Efforts, and D: Mobile Source Incentives, in Chapter 5b, will reduce children's exposure outside of the classroom. These actions include enforcement actions to address truck idling (e.g., idling inspection sweeps), providing incentives to replace older, higher polluting trucks with newer, cleaner technology earlier than required by

existing regulations and install infrastructure for cleaner technologies, and install "No Idling" signs at CSC- identified idling locations (e.g., outside schools). Truck idling sweeps and "No Idling" sign installation can address idling trucks near schools. Providing incentives for truck replacement and infrastructure will lead to lower emissions; therefore, also limiting children's exposure.

Appendix 5b lists upcoming federal and state regulations that aim to reduce emissions from mobile sources. Emission reduction targets from statewide measures for mobile sources are in Chapter 5a: Introduction to Actions to Reduce Community Air Pollution. Emission reductions achieved through regulations will also help reduce exposure.

Response to Comment 1-201

The proposed language is not included as it is already a requirement. South Coast AQMD has developed a Project Plan to install school air filtration systems at public schools in AB 617 communities. The Project Plan requires participants to make air filtration systems funded by CAPP incentives available for inspection if requested by South Coast AQMD and/or CARB during the project lifetime. For more information related to the Project Plan, please refer to http://www.aqmd.gov/home/programs/business/community-air-protection-incentives.

Response to Comment 1-202

The proposed language is included with edits in Goal F of Chapter 5b. South Coast AQMD commits to pursue collaborations with local agencies to address the CSC's concerns related to enforcement of truck routes and the proximity to sensitive receptors. See Response to Comment 1-180 regarding authority.

Response to Comment 1-203

The proposed language regarding working with local school districts and CSC to support projects that reduce students' exposure to air pollution is added to Goal B, in Chapter 5b. Additionally, language is added to Goal D, in Chapter 5b, and states that South Coast AQMD will conduct outreach to the SLA CSC when new funding opportunities arise.

See Response to Comment 1-200 for information on current programs for retrofitting school buses (South Coast AQMD's Lower-Emission School Bus Program, California HVIP Program, and the U.S. EPA Clean School Bus Program).

Response to Comment 1-204

The proposed language is not included. South Coast AQMD cannot commit other agencies to provide the requested data, nor can South Coast AQMD speak to whether the requested data exists. Regardless, CERP actions will address mobile sources, specifically trucks as outlined in Chapter 5b.

Response to Comment 1-205

Goal F is included in Chapter 5b to address the CSC's concerns related to truck traffic and designated truck routes. South Coast AQMD and CARB commit to working with the Los Angeles Department of Transportation and other land use agencies further to determine feasibility of

physical barriers to address truck traffic in residential neighborhoods. Land use agencies such as the City and County have authority to designate truck routes that impact neighborhood traffic. Although South Coast AQMD cannot commit to another agencies' willingness to collaborate on assessing the feasibility of preventing truck traffic in residential neighborhoods or near schools, South Coast AQMD will provide updates to the CSC regarding efforts on the implementation of Goal F in Chapter 5b. South Coast AQMD and CARB commit to collaborate with and make enforcement referrals to local agencies to address the CSC's concerns related to enforcement of truck routes and the proximity to sensitive receptors through implementation of Goal F in Chapter 5b.

Response to Comment 1-206

Language is added in Chapter 5b, Goal C for CARB to conduct compliance and inspections of trucks and buses, including the following regulations: Truck and Bus, transport refrigeration units (TRU), and idling. CARB will not be conducting Drayage Truck Regulation compliance inspections after December 31, 2022, because this regulation (https://ww2.arb.ca.gov/sites/default/files/classic/msprog/onroad/porttruck/arbdoc/sumreg.pdf) sunsets into the Truck and Bus Regulation (https://www.arb.ca.gov/msprog/onrdiesel/documents/fsregsum.pdf?_ga=2.109017602.1610785373.1652716608-291252920.1581002162)) at that time. CARB will continue to determine compliance with all CARB rules relevant to the vehicles they are conducting inspections throughout the implementation timeline, including the Truck and Bus and TRU Regulations.

Response to Comment 1-207a

Language is not included in Chapter 5b, Goal D, since there may be some privacy issues releasing grantee information. Creating a tool to provide this information may pull resources needed for implementing other actions that can result in emission reductions. South Coast AQMD will provide a status update regarding incentives allocated to the SLA community through the Annual Progress Report as required by CARB's Blueprint. South Coast AQMD can also provide updates on incentive efforts annually when the Annual Progress Report is presented. These reports are a tool to inform AB 617 Communities about where AB 617 incentives are provided, including the funding amounts allocated for and emission reductions resulting from specific community-identified incentive plans (i.e., mobile source, stationary source) and other incentive projects that qualify under the CAP Guidelines. For more information on CAP Guidelines, please refer to https://ww2.arb.ca.gov/resources/documents/community-air-protection-incentives-guidelines. Additionally, a listing of proposed and awarded mobile source and infrastructure projects for CAP funding may be found at http://www.aqmd.gov/home/programs/business/community-air-protection-incentives.

Response to Comment 1-207b

Goal D: Mobile Source Incentives in Chapter 5b already commits South Coast AQMD to explore opportunities for incentive funds for SLA. CARB's CAP Guidelines require that AB 617 incentive funds are distributed in AB 617 designated communities or in future designated communities,

ensuring that incentive funds support local community-identified projects, such as cleaner mobile source technologies. Therefore, the incentive funds allocated as part of the AB 617 program would be distributed in SLA as part of implementation of Goal D in Chapter 5b. If needed, South Coast AQMD will develop and submit an AB 617 project plan, such as the Truck Incentives Work Plan, to target incentives for cleaner mobile source technologies in the SLA community.

Response to Comment 1-208a

The proposed language is the same as Goal D in Chapter 5b. Goal D commits South Coast AQMD to explore incentive funding opportunities for cleaner mobile source technologies, which may include funding for replacing older, higher polluting vehicles with cleaner vehicles. Additionally, language is added to Goal D to commit the South Coast AQMD to outreach to the CSC when new funding opportunities are available to incentivize replacing older, higher polluting on-road (e.g., trucks and buses) and off-road (e.g., locomotives) equipment with cleaner technology.

South Coast AQMD currently implements numerous mobile source incentive programs that encourage and accelerate the adoption of zero and near-zero emission technologies for heavy-duty trucks. These programs include Carl Moyer, Proposition 1B, Voucher Incentive, Volkswagen Mitigation, and CAPs. These programs generally offer larger incentives for zero-emission trucks compared to other technologies. The larger incentives encourage the acceleration and adoption of zero-emission trucks and acknowledge that zero-emission truck technologies are currently more expensive and, in many cases, are unavailable or have limited availability relative to near-zero technologies. For more information about these programs, please refer to: http://www.aqmd.gov/home/programs/business/business-detail?title=vehicle-engine-upgrades. Appendix 5b, section "Incentives" includes information on mobile source incentives.

South Coast AQMD is supportive of opportunities to provide zero-emission technologies. However, because zero-emission technologies are not commercially available or feasible for all sectors and applications, deployment of zero-emission technology may not be possible for a given project. Where incorporation of zero-emission technology is possible, South Coast AQMD requests that the use of such technology be considered and in the absence of zero-emission technologies, near zero-emission technologies or the cleanest technology should be used.

Response to Comment 1-208b

The first action in Chapter 5b, Goal D (see Table 5b-1) currently cites small businesses and independent truck owners and operators as examples for cleaner mobile source technology incentive funds. Goal D commits to developing an incentive program for the SLA community to incentivize cleaner technologies, particularly for small businesses and independent truck owners and operators. Further, South Coast AQMD has begun implementing this measure through the development of the Truck Incentives Workplan. For more information about this plan, please refer to: http://www.aqmd.gov/home/programs/business/community-air-protection-incentives/truck-incentives-workplan.

The South Coast AQMD also incentivizes small businesses and independent truck owners and operators through other agencies programs, such as the Voucher Incentive Program ((VIP), http://www.aqmd.gov/home/programs/business/business-detail?title=voucher-incentive-program&parent=vehicle-engine-upgrades). The VIP is a streamlined approach to reducing emissions by replacing old, high-polluting vehicles with newer, lower-emission vehicles. This program is specifically limited to truck owners and operators with fleets of 10 or fewer vehicles.

Response to Comment 1-208c

Chapter 5b, Goal D includes exploring incentive fund opportunities for electric vehicles, such as Replace Your Ride Program. South Coast AQMD currently administers the Replace Your Ride program, which encourages scrapping and replacing an older vehicle with an advanced technology cleaner vehicle. The program is geared toward prioritizing applicants who reside within a Disadvantaged Community (DAC) and are low income. Replace Your Ride also gives a higher incentive to participants who decide to replace their vehicle with a Plug-in Hybrid (PHEV) or a zero-emission vehicle. Additionally, applicants who purchase a PHEV or dedicated battery electric vehicle (BEV) are eligible for an additional incentive to install electric vehicle charging equipment. More information on the Replace Your Ride Program can be found here: https://xappprod.aqmd.gov/RYR/Home. Appendix 5b, section "Incentives" includes the Replace Your Ride Program.

South Coast AQMD works with all applicants, and for applicants in DACs with limited online resources provides assistance to start an application and also includes language assistance during the application submittal process. Additionally, South Coast AQMD will conduct outreach to the SLA CSC when new funding opportunities arise for this program (Goal D of Chapter 5b).

Response to Comment 1-209

The proposed language to explore new rule development for all construction sites is not included as the CSC concerns related to construction sites will be addressed through focused enforcement at CSC-identified locations. The language referencing South Coast AQMD rules (e.g., Rule 402, Rule 403 – Fugitive Dust, Proposed Rule 403.2 – Fugitive Dust from Large Roadway Projects, and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants) enforced by South Coast AQMD at construction sites is moved to Chapter 5d: General Industrial Facilities, Goal G.

Goal E in Chapter 5b is modified to focus enforcement on CARB regulations. South Coast AQMD will work with the CSC to establish a prioritized list of construction sites that are of concern. South Coast AQMD's and CARB's enforcement efforts will evaluate compliance with CARB's mobile source and portable equipment regulations at these sites. Language is added to Goal E, in Chapter 5b, to include "CARB regulations (e.g., CARB's Off-Road Diesel Regulation, Portable Equipment Registration Program)" to address additional operations that fall within CARB'S authority and may not be captured through South Coast AQMD's regulations.

Response to Comment 1-210

South Coast AQMD and CARB verify compliance with all applicable rules and regulations at any location within their respective authority, including at construction sites.

South Coast AQMD commits to conducting focused enforcement at CSC-identified locations through implementation of Chapter 5b, Goal E and Chapter 5d, Goal G. For projects identified by the CSC, South Coast AQMD will determine if South Coast AQMD was notified of the CEQA document and was reviewed and commented on the proposed construction project. While some aspects of operation at construction sites may not be applicable to any South Coast AQMD regulation, overall, construction sites must comply with all applicable rules (e.g., CARB's Portable Equipment Registration Program, South Coast AQMD Rule 402, Rule 403, and Proposed Rule 403.2). There are no construction sites which are completely exempted from all rules. Language is added to Goal E, in Chapter 5b, to include "CARB regulations (e.g., CARB's Off-Road Diesel Regulation)" to address additional operations that may not be captured through South Coast AQMD's regulations.

Response to Comment 1-211

South Coast AQMD enforces all applicable rules at any location within its authority, including construction sites. As part of implementation of this CERP, South Coast AQMD will prioritize enforcement efforts at CSC-identified locations of concern but will also continue to enforce applicable rules at any other location the South Coast AQMD inspects.

Chapter 5c: Auto Body Shops

Response to Comment 1-212

The proposed language is included in Chapter 5c: Auto Body Shops, section "Community Concerns".

Response to Comment 1-213

A map of the applicable permitted facilities is included in Chapter 5c and Appendix 5c: Auto Body Shops (see Table A5c-3).

Response to Comment 1-214

South Coast AQMD has not received the SCLA-PUSH data on unpermitted or auto body shops missing from South Coast AQMD's data sets. The locations that the commenter believes are missing from South Coast AQMD's data set can be mentioned during implementation of Goal B: Identify Facilities of Concern of Chapter 5c. Additionally, language is added in Chapter 5c, section "Regulatory Background" to further explain how facilities are classified by South Coast AQMD. During implementation of Goal B: Identify Facilities of Concern, in Chapter 5c, the community co-leads may share the locations they believe are missing from South Coast AQMD's data set so that those locations are included in the auto body shop inspection sweeps committed to in this goal.

Response to Comment 1-215

The proposed language regarding missing or misclassified facility data is included, with edits, in Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, section "Air Quality Priorities". Additionally, language is added in Chapter 5c, section "Regulatory Background" to further explain how facilities are classified by South Coast AQMD.

Response to Comment 1-216

An explanation of applicable rules may be found in Appendix 5c.

Response to Comments 1-217, 218, and 219

Goal G: Rule Amendments is included in Chapter 5c to address the request to include improvement of Rules 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operation and 1171 – Solvent Cleaning Operations. South Coast AQMD will share the best management practices provided by the commentor, including information in the tables, so the information can be considered as part of the rule development process for Rules 1151 and 1171G. Additionally, as part of the rule development process South Coast AQMD identifies and notifies all applicable facilities and interested stakeholders (e.g., commentor, CSC) of potential changes so that they may participate in the process (e.g., provide comment, present research). Best management practices can be considered part of the assessment conducted during the rule development process.

Goal B: Identify Facilities of Concern in Chapter 5c lists one of the actions as conducting auto body shop inspection sweeps, prioritizing CSC-identified locations, and taking enforcement action when appropriate. Language is included in Goal D of Chapter 5c to acknowledge the commenter's suggestion of the U.S. EPA's Collision Repair Campaign and U.S. EPA Best Practices and as an example of material that can be provided for outreach.

Goal H: Auto Body Shops Incentives is included in Chapter 5c to explore incentive opportunities for low-VOC paint and coatings and water-based cleaners used at auto body shops and to conduct outreach to the CSC when these opportunities are available.

Response to Comment 1-220

The proposed language, with edits, is included in Goal A: Inform Community of Pertinent Rules in Chapter 5c.

Response to Comment 1-221

Language is added in Goal B of Chapter 5c to clarify enforcement action will occur when appropriate. If an inspector identifies a facility is non-compliant, an enforcement action will be taken as follows: notice to comply (NC) or notice of violation (NOV). A NC may be issued for minor violations found during an inspection or to request additional information. If a NC is issued, then the facility must take steps to demonstrate compliance (e.g., provide records). A NOV may be issued for noncompliance with rules, permit conditions, or administrative requirements and generally result in a fine or other penalty. If a NOV is issued, the facility must come into compliance and the case is still settled by the Office of General Counsel. More information

regarding enforcement action is included in Chapter 4: Enforcement Overview and History, section "Enforcement Overview."

Response to Comment 1-222

South Coast AQMD agrees there is value in collaboration; therefore, language is changed from "refer" to "collaborate." South Coast AQMD and CARB commit to collaborating with and making enforcement referrals to appropriate agencies when issues are identified through implementation of Goal C: Agency Collaboration and Referrals in Chapter 2c. Agency collaboration will include referring issues that arise during auto body shop inspection sweeps and informing those agencies about AB 617 (e.g., goal to reduce emissions, purpose of inspection sweeps). Implementation will also include informing the CSC of those collaboration efforts and requesting that the appropriate agencies present follow-up information regarding the referrals made. Additionally, in Chapter 5c, Goal A: Inform Community of Pertinent Rules includes an action to collaborate with partner agencies who also have authority over auto body shops.

Response to Comment 1-223

The proposed language with edits has been included as an action for Goal D in Chapter 2c. Although South Coast AQMD cannot guarantee feedback from owners or operators, South Coast AQMD is committed to conducting outreach to seek feedback from owners or operators regarding their understanding of applicable requirements and/or their willingness to incorporate best management or "Good Neighbor" practices.

Response to Comment 1-224

See Response to Comments 1-217, 218, and 219.

Chapter 5d: General Industrial Facilities

Response to Comment 1-225

Subchapters for general industrial facilities are not included; the varying industries within this category are overly numerous.

Response to Comment 1-226

Images of example general industrial facilities are added in the Final CERP as Figure 5d-1 "SLA Air Quality Concerns from industrial Facilities" in Chapter 5d and Figure A5d-1 "Distribution of General Industrial Facilities within SLA" in Appendix 5d: General Industrial Facilities.

Response to Comment 1-227

Hydrocarbon solvents is added as a community concern.

Response to Comment 1-228

This section is moved to section "Regulatory Background." Language is added to reflect the end date of the financial incentive grant program and links with the footnotes. More information regarding the financial incentive grant program is included in Appendix 5d, section "Dry Cleaning Grant Program".

Response to Comment 1-229

Language is added in Appendix 5d, which includes a map as Figure A5d-4 "Map of Grant-Funded Dry Cleaners in SLA" of the dry cleaning facilities that received funding in the SLA community boundary from the Dry Cleaning Grant Program.

Response to Comment 1-230

The proposed language is not included as perchloroethylene (PERC) is no longer utilized within the Basin (please refer to Appendix 5d for additional information related to Rules 1102 – Dry Cleaners Using Solvent Other than Perchloroethylene and 1421 – Control of Perchloroethylene Emissions From Dry Cleaning Systems). Although the assessment of short- and long-term impacts of PERC are correct, nausea and vomiting are not considered to be symptoms of PERC consumption or inhalation.

Response to Comment 1-231

The proposed language is not included as it cannot be verified that hydrocarbon solvents are a source of water pollution nor that it impacts greenhouse gas emissions. South Coast AQMD acknowledges the community co-leads' concern with hydrocarbon solvents, which is added as a community concern. Language is included to clarify PERC is no longer utilized within the Basin in Chapter 5d, section "Regulatory Background." For more information regarding CARB's regulations to phase out PERC in dry cleaning operations by January 1, 2023, please refer to: https://ww2.arb.ca.gov/our-work/programs/phase-out-perchloroethlyene-dry-cleaning-process.

Response to Comment 1-232

Rule amendments, as well as Best Available Control Technology (BACT) determinations, follow specific legal requirements and established procedures, including ensuring a public process for stakeholders, incorporating cost effectiveness, and incorporating Governing Board oversight (e.g., adoption and review). During the rulemaking process, new rule requirements may require a source to reduce their emissions or prohibit usage of certain materials, regardless of the source's BACT determination. BACT is implemented in the permitting process and follows the BACT Guidelines. In general, BACT evaluation is conducted if a new or modified source that will result in emissions increase of one pound per day or more. The BACT Guidelines can be found here: http://www.aqmd.gov/HOME/permits/bact/guidelines. The BACT Guidelines identify BACT determinations for classes and categories of equipment and are separated into two sections: major sources or Title V facilities, and minor sources. A facility is determined to be a major and minor source depending on the actual or potential emissions it emits. South Coast AQMD will evaluate the data provided in addition to reviewing available permitting data to determine if a new BACT determination should be included as a part of upcoming BACT Guidelines efforts.

The dry cleaners in SLA, are considered minor sources under South Coast AQMD's New Source Review. More information regarding South Coast AQMD's New Source Review can be found here: http://www.aqmd.gov/HOME/permits/new-source-review. BACT is triggered for minor sources, if there is an increase of one pound per day or more of any criteria pollutant (e.g., ozone,

particulate matter (PM10), carbon monoxide, lead, nitrogen dioxide, and sulfur dioxide). It is important to note that once a permit is issued, a facility is not required to meet any updated BACT requirements adopted into the BACT Guidelines, unless at a later date a facility applies to modify their permit in a manner that results in an emission increase of one pound per day or more of criteria pollutant emissions, or if they apply for a new or relocated permit unit. In other words, BACT requirements are locked in (e.g., grandfathered), at the time the equipment is permitted.

California Health and Safety Code, Section 40440.11 requires a public process for updates to the minor source BACT Guidelines. This includes presenting BACT determinations to the BACT Scientific Review Committee in a public meeting and South Coast AQMD Governing Board adoption. Additionally, the technology, submitted for BACT determination, must be achieved in practice, technologically feasible, and cost-effective. Cost-effectiveness is measured in terms of control costs (dollars) per emissions reduced (tons). The technology must be cost-effective for a substantial number of sources within the class or category and meet the cost-effectiveness criteria as adopted by the South Coast AQMD Governing Board for BACT.

For dry cleaners, the CERP includes a series of actions to help transition new dry cleaners to the cleanest technologies. Goal C: Dry Cleaners in Chapter 5d is included to help transition new dry cleaners to the cleanest technologies by initiating the amendment of Rule 1102 to consider new standards reflecting zero-emissions technologies for new dry cleaning systems and identifying incentive opportunities to transition to community-identified alternatives (e.g., professional wet cleaning, other zero-emission technologies). South Coast AQMD believes an incentives pathway will encourage operators to install zero-emission technologies when installing new dry cleaning machines. South Coast AQMD understands that the CSC wants to pursue a revision to BACT. Updating the BACT Guidelines would not require or necessarily result in the phase out of existing permitted equipment. The new BACT requirement would only apply when a permit application was submitted for a new dry cleaner or for modification(s) at an existing dry cleaner which would cause an increase in emissions of one pound per day or more of a criteria pollutant. These types of modifications do not occur regularly for dry cleaners, and for new units there would be no way to estimate and ensure emission reduction targets are met from such a CERP measure. Therefore, relying on a new BACT determination for dry cleaners will not ensure emissions reductions are achieved. South Coast AQMD believes if the CSC is seeking an action to require new dry cleaning machines to use a zero-emission technology, that a regulatory approach is a more appropriate pathway to achieve this objective.

Goal C: Dry Cleaners, includes language to identify incentive opportunities to support transitioning to community-identified alternatives and conducting community outreach to owners or operators regarding these alternatives. If the CSC decides to utilize CAP incentive funds to create a community-identified project plan for alternative dry cleaning operations (e.g., professional wet cleaning) and CARB approves the plan, the designated amount of incentive funds approved for that project plan would be available to all dry cleaners who qualify within the

SLA community. For additional information regarding Incentives for community-identified stationary source project plans, please refer to the "Incentives" section in Appendix 5a.

Response to Comment 1-233

A metric is included for Goal D: Agency Collaboration and Referrals in Table 5d-1 "Actions to Reduce Emissions from and Exposure to General Industrial Facilities," for updates regarding referrals or follow-up information presented by the appropriate agency(ies), as a "report back to the CSC."

Response to Comment 1-234

The proposed language is not included. Considering South Coast AQMD's focus on compliance and enforcement at facilities, and the limited staff to conduct inspections over the entire region, South Coast AQMD cannot commit to an outreach-specific plan for enforcement. However, South Coast AQMD's inspection teams are committed to visiting, inspecting, and taking appropriate enforcement action at any locations of concern identified by the CSC as part of this action. An action is added to Goal A: Identify Facilities of Concern in Chapter 5d, which commits South Coast AQMD to conducting outreach, outside of enforcement efforts, to small businesses to encourage incorporation of best management and "Good Neighbor" practices.

Response to Comment 1-235

The proposed action language regarding identifying general industrial facilities clusters is not included. The locations of general industrial facilities will be shown on the interactive online SLA Story Map, which will map stationary sources of pollution for each air quality priority. The interactive online SLA Story Map will be available after CERP adoption. South Coast AQMD is specifically prohibited by state law from making land use decisions and does not have land use authority. These decisions are generally made by city or county planning agencies. Thus, South Coast AQMD lacks the authority to regulate the physical development of land, type of uses on these lands, such as zoning (e.g., residential, commercial, industrial), and the proximity of areas zoned within each other (e.g., siting residences near industrial facilities). However, South Coast AQMD's AB 2588 program provides the public with information regarding potential health effects from toxic air contaminants emitted from existing permitted facilities and develops plans to reduce associated risks. Please refer to section "South Coast AQMD Ongoing Efforts" in Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts for more information on the AB 2588 program. Please also refer to section "Key Stationary Sources of Pollution in the Community" in Appendix 2a: Community Profile for a list of facilities within the SLA community subject to the AB 2588 program (see Table A2a-2 "Facilities in the AB 2588 Program within SLA").

South Coast AQMD is currently developing guidance for public agencies to evaluate cumulative air quality impacts from increased emissions of toxic air contaminants during the CEQA process. The first working group meeting was held in February 2022 and the presentation, along with future documents and working group presentations, can be accessed at: http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).
Additionally, South Coast AQMD utilizes the Multiple Air Toxics Exposure Study V (MATES V) and

CalEnviroScreen 4.0 to evaluate cumulative exposure burden. MATES V focuses on the carcinogenic risk from exposure to all TACs, including DPM, and CalEnviroScreen 4.0 takes into consideration multiple sources of pollution. Additional information on MATES V and CalEnviroScreen 4.0 can be found in Appendix 2a: Community Profile and here, respectively: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v; https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

Response to Comment 1-236

Language regarding concerns with metal recyclers near sensitive receptors is in Chapter 5e: Metal Processing Facilities in section "Community Concerns". Additionally, Goal G: Metal Recycling and Shredding Facilities in Chapter 5e commits South Coast AQMD to initiate the rule development process for Proposed Rule 1460 – Control of Particulate Emissions from Metal Recycling and Shredding Operations to address housekeeping and best management practices at metal recycling facilities and metal scrapyards. Rulemaking for Rule 1460 is initiated.

With respect to language regarding identifying general industries near sensitive receptors, Goal A: Identify Facilities of Concern in Chapter 5d includes working with the CSC to identify and prioritize general facilities of concern. The CSC may elect to identify and prioritize facilities near sensitive receptors during CERP implementation.

Response to Comment 1-237

The proposed language is not included in Goal B because each of the suggested actions are captured in other SLA CERP Goals that are more appropriate. Language is added in Goal A: Identify Facilities of Concern, Chapter 5d to address the request to promote "best practices" for facilities by committing to conducting outreach to small businesses related to best management and "Good Neighbor" practices. In addition, the CERP also includes a provision in Chapter 5d, Goal B: Identify Strategies that during the permit application process, South Coast AQMD will provide information to the permit applicants of cleaner alternative technologies (e.g., commercially available zero-emissions technology, non-toxic alternatives). The information can highlight benefits of the zero-emission technologies including those technologies that do not require a permit by the South Coast AQMD.

Regarding improving reporting for small sources of pollution, South Coast AQMD Rule 301 – Permitting and Associated Fees (http://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-301.pdf) was amended in 2019 to require CARB Criteria Pollutant and Toxics Emissions Reporting (CTR) facilities to report emissions to South Coast AQMD through the AER Program. CARB's CTR requires additional facilities to report emissions over the next six years and the majority of these facilities will be smaller facilities. Facilities are phased-in based on industry sector and general industrial classifications (North American Industry Classification System (NAICS) and Standard Industrial Classification (SIC) codes). Once the data is reported and complied, it will be reported in South Coast AQMD's online F.I.N.D. tool.

South Coast AQMD attempts to respond to all complaints promptly, regardless of business size. Goal A commits to informing the CSC of three years of compliance history of the CSC-identified facilities. Additionally, Goal E: F.I.N.D. Tool and Filing Complaints commits to conducting outreach on training on these two topics. Members of the public may submit air quality complaints by phone via 1-800-CUT-SMOG (1-800-288-7664) or the online complaint system (http://www3.aqmd.gov/webappl/ComplaintSystemOnline).

With respect to the language regarding procedural changes to the permitting process to help facilities achieve compliance to reduce exposure to emissions, there is an established process to issue permits and evaluate compliance. When a facility applies for a new or modified permit, South Coast AQMD evaluates the equipment to ensure it meets federal (U.S. EPA), state (CARB), and local (South Coast AQMD) air quality rules and regulations. If a facility qualifies under the Small Business Assistance program, South Coast AQMD will assist business owners or operators in filling out South Coast AMQD permit applications to ensure the application will be deemed complete when submitted. The Small Business Assistance program will also review applicable rules and regulations with the applicants to further explain South Coast AQMD requirements prior to permit issuance. More information on the Small Business Assistance Program can be found at: http://www.aqmd.gov/home/programs/business/business-detail?title=small-business-assistance. Permits issued have permit conditions to ensure the facility maintains equipment, conducts recordkeeping, and operates equipment in compliance with rules and regulations. South Coast AQMD's Compliance and Enforcement Division conducts facility inspections to ensure permit conditions are being followed and remain in compliance. If a facility is found to be in non-compliance, South Coast AQMD inspectors can pursue two methods of enforcement action: a Notice to Comply (NC) or a Notice of Violation (NOV). Inspectors will then conduct follow-up inspections to ensure that the facility returns to compliance; this can involve issuing additional notices if necessary. For more information related to the enforcement action process, please refer to section "Enforcement Overview" in Chapter 4: Enforcement Overview and History.

Chapter 5d, Goal B: Identify Strategies and Goal C: Dry Cleaners but include actions to identify incentive opportunities. If the CSC decides to use acquired funds to incentivize and promote the use of BACT and assist small businesses or general industrial facilities to purchase equipment that can mitigate emissions, a community-identified stationary project plan must be created according to the CAP Incentives 2019 Guidelines and must be approved by CARB. For additional information regarding Incentives for community-identified stationary source projects, please refer to Appendix 5a.

Response to Comment 1-238a

See Response to Comment .

Response to Comment 1-238b

See Response to Comment regarding requiring professional wet cleaning as BACT in Rule 1102. Legacy contamination is not within South Coast AQMD's authority but falls within the authority

of other agencies. For example, chemical contamination of groundwater resulting from dry cleaners may be addressed through implementation of multiple clean-up programs to restore and protect groundwater quality. These clean-up programs may be implemented by the State Water Resources Control Board, Regional Water Quality Control Boards, the Department of Toxic Substances Control, and local agencies. More information on the State Water Resources Control Board Cleanup Program can be found here: https://gispublic.waterboards.ca.gov/portal/apps/storymaps/stories/d0e1bdef7cef466a9c35c9ac7ad5efe4. South Coast AQMD Rules 1166 – Site Specific and Various Locations Soil Mitigation Plan and 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants regulate soils contaminated with VOCs or TACs, respectively, which are enforced directly by South Coast AQMD. DTSC, water boards, and other regulatory agencies often directly cite these regulations in their clean-up plans. For more information regarding example clean-up programs and Rules 1166 and 1466, please refer to Table A5e-3 "State and Federal Programs to Address Toxic Metal Air Pollutant Emissions" in Appendix 5e: Metal Processing Facilities and Table A5d-2 "Examples of South Coast AQMD Rules Applicable to General Industrial Facilities" in Appendix 5d, respectively.

As of December 31, 2020, the use of PERC dry cleaning systems is prohibited by South Coast AQMD Rule 1421. Under this prohibition, no person can legally operate a PERC dry cleaning system within the authority of the South Coast AQMD including in SLA. Chapter 5d, Goal C commits South Coast AQMD to identifying incentive opportunities to transition to community-identified alternatives. Implementation of this goal will include working with CSC members and the community co-leads to develop an incentives program that adheres to CARB's CAP Guidelines. Assembly Bill 998 (AB 998) established a grant in 2004 that was administered by CARB. South Coast AQMD will work with the CSC, CARB, and other stakeholders to identify sources of funding, and explore the development and implementation of a new professional wet cleaning incentive program. AB 998 funds and South Coast AQMD's Dry Cleaning Grant funds were leveraged to incentivize transition from PERC to non-toxic, non-smog forming dry cleaning equipment. The last phase of the South Coast AQMD's Dry Cleaning Grant program transitioned 166 PERC dry cleaners to wet cleaning. If there are any remaining funds in AB 998, South Coast AQMD will work with CARB to determine feasibility of leveraging those funds for SLA. However, it is important to note that the AB 998 program was established by the California Legislature to provide financial incentives to dry cleaners within the State to transition from dry cleaning systems using PERC, an identified TAC and potential human carcinogen, to non-toxic and non-smog forming systems. Therefore, even if there remaining funding available in the AB 998 program; there may be a need for legislative change to switch those funds to incentivize the transition of solvent-based dry cleaning to professional wet dry cleaning systems. For more information regarding South Coast AQMD's grant recipients in SLA, please refer to section "Dry Cleaning Grant Program" in Appendix 5d.

Response to Comment 1-238c

The suggested language with minor edits has been included as a metric for Chapter 5d, Goal C. Although South Coast AQMD cannot guarantee feedback from owners or operators, it is committed to conducting outreach to seek feedback from dry cleaner owners or operators regarding their willingness to provide feedback to demonstrate effectiveness of outreach and to transition to alternatives.

Response to Comment 1-239

The proposed action language regarding the United States Department of Labor Occupational Safety and Health Administration (OSHA) uplifting incentives, operations, and equipment for best management practices to protect workers is not included. South Coast AQMD cannot commit OSHA to actions in this CERP. An action is added in Chapter 5d, Goal A to collaborate with the CSC to improve outreach to small businesses to encourage incorporation of best management and "Good Neighbor" practices. The action for Goal B: Identify Strategies is to identify emissions and exposure reduction measures, which includes identifying incentive opportunities.

Response to Comment 1-240

South Coast AQMD is continuously working on improvements to the online F.I.N.D. tool based on stakeholder and community feedback. South Coast AQMD will also work on adding functionality in the online F.I.N.D. tool to search by pollutants submitted by facilities in AER and to download bulk data, as appropriate. During implementation of Goal E: F.I.N.D. Tool and Filing Complaints in Chapter 5d, South Coast AQMD will obtain feedback from the CSC to determine what improvements can be made to the online F.I.N.D. tool. Additionally, detailed help materials and video tutorials are being built to make the online F.I.N.D. tool more accessible and user-friendly, and to highlight existing features such as searching for facilities by industry type and AB 617 community. Chapter 5b: Mobile Sources, Action A: Warehouses and Idling also commits to exploring opportunities to make Rule 2305 Warehouse Actions and Investments to Reduce Emissions (WAIRE) reports available on the online F.I.N.D. tool.

Response to Comment 1-241

South Coast AQMD will provide periodic updates regarding enforcement activity and findings when feasible. For example, Chapter 5d, Goal G commits South Coast AQMD to conducting focused enforcement at construction sites and providing updates to the CSC regarding enforcement. Enforcement statistics regarding number of inspections per air quality priority for any enforcement related goals in the CERP, such as Goal G, and will be included in the Annual Progress Report for South Coast AQMD.

Response to Comment 1-242a

Action language is added in Chapter 5d, Goal C committing South Coast AQMD to initiate rule development for Rule 1102 to consider establishing a new emission standard reflecting zero-emission technologies for new dry cleaning systems. South Coast AQMD will pursue the action to amend Rule 1102 as described in the CERP action. During rule development South Coast AQMD will work with stakeholders and will take into consideration technical feasibility, operator

acceptance, and cost-effectiveness. The proposed amended rule will then be presented to the Governing Board for adoption. South Coast AQMD is technology neutral and allows businesses to decide how they choose to comply with the requirements set forth in South Coast AQMD Rule 1102. The 2016 South Coast AQMP prioritized VOC reductions that reduced toxics or had co-benefits of reducing other criteria pollutants. Since solvents used in hydrocarbon cleaning are not toxic, there is not currently a toxicity concern or attainment need to be addressed. Based on permitting data, staff is not aware of a toxicity issue with petroleum dry cleaning.

Response to Comment 1-242b

See Response to Comment 1-232.

Response to Comments 1-242c and 242d

Action language is added in Chapter 5d, Goal C committing South Coast AQMD to initiate rule development for Rule 1102. Although there is no regulatory need to phase out non-PERC solvent dry cleaning systems, South Coast AQMD will assess new dry cleaning systems through rule development described in Goal C. South Coast AQMD would like to note that the solvents currently used are non-toxic and the VOC emissions from non-PERC solvent dry cleaning systems do not have localized effects. Recent ozone modeling indicates that further VOC reductions do not have appreciable impacts on ozone reductions. See Response to Comment 1-242a.

Response to Comments 1-242e and 1-242f

Goal C in Chapter 5d includes language to seek funding (e.g., incentives) to support transitioning to community-identified alternatives. Additionally, language is added to conduct outreach to owners or operators regarding incentive opportunities. Implementation of this action will include working with CSC members and the community co-leads to develop an incentives program that adheres to CARB's CAP Incentives 2019 Guidelines. For additional information regarding Incentives for community-identified stationary source projects, please refer to section "Incentives" in Appendix 5a.

Response to Comment 1-242g and 1-242h

If and when a new BACT listing is made for non-PERC solvent dry cleaning, outreach can be considered after the new BACT listing is made. Additionally, as part of the rule development process South Coast AQMD identifies and notifies all applicable facilities and interested stakeholders of potential changes so that they may participate in the rule development and provide comment.

Response to Comments 1-242i and 1-242j

Goal C in Chapter 5d includes language to identify incentive opportunities to support transitioning to community-identified alternatives and conducting community outreach to owners and operators regarding those alternatives. See Response to Comments 1-242e and 1-242f.

As wet cleaning technology is more than a decade old and many cleaners have successfully implemented the technology, further demonstration projects appear unnecessary. Chapter 5d,

Goal C commits South Coast AQMD to initiate rule development for Rule 1102 to consider establishing a new emission standard reflecting zero-emission technologies for new dry cleaning systems. Additionally, as part of the rule development process South Coast AQMD identifies and notifies all applicable facilities and interested stakeholders of potential changes so that they may participate in the rule development process and provide comment. It is worth noting that the solvents currently used are non-toxic and these VOC emissions do not have localized cancer risks.

Response to Comment 1-242k

See Response to Comment 1-242g and 1-242h.

Response to Comment 1-242l

The proposed timeline dates were not included because the proposed actions and metrics were not included. See Response to Comment 1-242a through Response to Comment 1-242k.

Chapter 5e: Metal Processing Facilities

Response to Comment 1-243

A map is added as Figure 5e-1 "Metal Processing Facilities in SLA" in the Final Draft.

Response to Comments 1-244 and 245

Please refer to Appendix 5e: Metal Processing Facilities for an overview of the rules referenced.

Response to Comments 1-246 and 1-247

The language regarding the Case Study on CMX is not included. South Coast AQMD appreciates the case study, but general agency practice is to not identify facilities by name, nor specific business practices, and to remain neutral as an agency. Further, South Coast AQMD does not have authority nor expertise regarding storm water permitting. Additionally, South Coast AQMD would need to conduct additional research on practices conducted at CMX and not all recommendations are appropriate for all facilities that are applicable to this air quality priority. For example, wet sweeping may not be required for all facilities. Many South Coast AQMD metals rules (e.g., Rules 1407 – Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Chromium Metal Melting Operations, 1407.1 – Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations, 1420 – Emissions Standard for Lead; 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities, 1420.2 – Emission Standards for Lead from Metal Melting Facilities, 1426 – Emissions from Metal Finishing Operations, 1430 – Control of Emissions from Metal Grinding Operations at Metal Forging Facilities, 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations, 1469.1 – Spraying Operations Using Coatings Containing Chromium) include requirements to clean using an approved cleaning method (e.g., wet wash, wet mop, wet vacuum, wet scrub, sweeping with use of dust suppressant, damp cloth, low pressure spray, protective coverings, or vacuum equipped with filter(s) rated by the manufacturer to achieve a 99.97 percent control efficiency for 0.3 micron particles) while minimizing fugitive dust emissions.

Action C: Identify Strategies in Chapter 5e that commits to evaluate best management practices that are incorporated in South Coast AQMD rules regulating metal processing facilities. South Coast AQMD will amend rules that are lacking sufficient best management practices and will provide outreach materials to facilities about best management practices. Metal processing rules primarily focus on toxic air contaminant metal particulate which is a specific form of PM. The primary focus of toxic air contaminant metal particulate includes lead, hexavalent chromium, cadmium, nickel, and arsenic. These metal toxic air contaminants are the primary focus based on their toxicity and use. Measures focusing on these metal toxic air contaminants will result in concurrent reductions of other metal toxic air contaminants that are far less toxic.

Response to Comment 1-248

Air toxic metal monitors are highly sophisticated and expensive and require specific technical expertise to operate. The South Coast AQMD has a pilot sensor library program to lend air quality sensors to community organizations for measuring PM2.5, ozone, and other criteria pollutants for a limited time. However, there are no air quality sensors that are capable of measuring air toxic metals.

Response to Comment 1-249

Language regarding best managements practices is added in Goal C: Identify Strategies and Goal F: Outreach to Owners and Operators. Goal C adds incentive opportunities as an example of a potential strategy for the to address their concerns. For more information regarding potential incentive opportunities, please refer to Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts. Goal F adds language to collaborate with communities and businesses to encourage incorporation of best management and "Good Neighbor" practices. Please see Response to Comments 1-246 and 1-247 regarding wet sweeping. With respect to enclosures and air monitoring, many South Coast AQMD rules have best management practices (e.g., total enclosures as required by Rule 1420.2) and monitoring (e.g., Bag Leak Detection System as required by Rule 1407) or testing requirements (e.g., emissions source testing as required by Rule 1407.1). Through the rule development process, South Coast AQMD assesses the appropriate best management practices and includes monitoring and testing to ensure compliance with the rule. Another part of the rule development process for criteria pollutants is a cost-effectiveness calculation to ensure that the proposed rule is cost-effective.

Action C: Identify Strategies in Chapter 5e that commits to evaluate best management practices that are incorporated in South Coast AQMD rules regulating metal processing facilities. South Coast AQMD will amend rules that are lacking sufficient best management practices and will provide outreach materials to facilities about best management practices. Metal processing rules primarily focus on toxic air contaminant metal particulate which is a specific form of PM. The primary focus of toxic air contaminant metal particulate includes lead, hexavalent chromium, cadmium, nickel, and arsenic. These metal toxic air contaminants are the primary focus based on their toxicity and use. Measures focusing on these metal toxic air contaminants will result in concurrent reductions of other metal toxic air contaminants that are far less toxic.

Response to Comment 1-250

Language is included in Chapter 5e, Goal A: CARB regulations committing South Coast AQMD to enforce South Coast AQMD Rule 1469. For an overview of this rule, please refer to Appendix 5e: Metal Processing Facilities. South Coast AQMD currently conducts extensive enforcement at hexavalent chromium plating shops by inspecting these facilities quarterly. If the CSC desires, this can be a part of the activity in Goal C: Identify Strategies to prioritize metals facilities of concern.

Response to Comment 1-251

The proposed language is not included. When certain processes (e.g., metal melting, metal grinding, plating) are conducted with chromium, they cause chromium to be converted to hexavalent chromium. Phasing out chromium from all metal melting operations within the next few years is unrealistic because viable alternatives to chromium must be found to be technically feasible and cost-effective. However, several South Coast AQMD rules include emissions limits for hexavalent chromium (e.g., Rules 1407, 1407.1, 1426, 1469, 1469.1). Additionally, many South Coast AQMD rules include emissions limits for particulate matter, which would also control hexavalent chromium emissions. Lastly, hexavalent chromium is included as a TAC in Rules 1401, 1401.1, and 1402 and therefore must be evaluated as part of health risk during permitting for certain existing, new, modified, or relocated sources.

South Coast AQMD does have several new rules that will address hexavalent chromium: Proposed Rule 1426.1 – Hexavalent Chromium Emissions from Metal Finishing Operations; Proposed Rule 1435 – Control of Emissions from Metal Heat Treating Processes; Proposed Rule 1455 – Control of Hexavalent Chromium Emissions from Torch Cutting and Welding; and Proposed Rule 1445 – Control of Toxic Emissions from Laser Arc Cutting.

With respect to chrome plating, in March of 2021, CARB proposed a hexavalent chromium phase-out in the Airborne Toxic Control Measure (ATCM) for Chromium Plating and Chromic Acid Anodizing Facilities. Draft regulatory language released in April 2022 includes the following phase-out dates: 1) January 1, 2026 for decorative hexavalent chromium electroplating, and 2) January 1, 2039 for hexavalent chromium electroplating and chromic acid anodizing. Additionally, in May 2020, South Coast AQMD received five million dollars of CARB's CAP funds to reduce hexavalent chromium emissions. Due to the potential phase out of hexavalent chromium, South Coast AQMD recommends using the incentive program to exclusively assist facilities switching from hexavalent chromium to trivalent chromium or other less toxic alternatives.

Response to Comments 1-252 and 1-253

See Response to Comments 1-246 and 1-247.

Response to Comment 1-254

Current language in Goal F: Outreach to Owners and Operators includes outreach on best management practices, South Coast AQMD's Small Business Assistance Program, permitting process, and applicable rules and regulations. Additional language has been added to Goal F to

collaborate with communities and businesses to encourage incorporation of best management and "Good Neighbor" practices.

A goal was added to the CERP actions for Metal Processing Facilities to conduct an assessment of best management practices in South Coast AQMD metal processing rules. If rules regulating metal toxic air contaminants lack best management practices, initiate rulemaking to incorporate provisions for best management practices. The assessment will cover South Coast AQMD Rules 1407, 1407.1, 1420, 1420.1, 1420.2, 1426, 1430, 1469, and 1469.1.

Currently, there are two South Coast AQMD rules that require ambient monitoring: Rule 1420.1 for large lead-acid battery recycling facilities and Rule 1420.2 for metal melting for lead facilities. Ambient monitoring for lead from these large lead processing facilities is required to ensure the Basin remains in attainment with the National Ambient Air Quality Standard (NAAQS) for lead. Ambient monitoring of metal toxic air contaminants, particularly hexavalent chromium, can be expensive. Staff believes it is a better use of resources to require all other metal processing facilities to install pollution controls, implement building enclosures, housekeeping, and best management practices and conduct periodic source tests with parameter monitoring of pollution controls, and only require facilities that have a significant health risk to conduct ambient monitoring. South Coast AQMD Rule 1480 – Ambient Monitoring and Sampling of Metal Toxic Air Contaminants requires ambient monitoring if a facility has been designated as a potentially high-risk level facility, where there is a significant health risk, and meets specified criteria.

Response to Comment 1-255

The proposed language was not included. See Response to Comments 1-246 and 1-247. Requirements for "mobile metal sweepers, workplace enclosures, and air monitoring installation" are dependent on the type of operations conducted and the type of metals processed at a metal facility and may already be required by existing South Coast AQMD regulations. Please refer to Response to Comment 1-254.

Response to Comment 1-256

In Chapter 5e Goal C: Identify Strategies, the CSC identified incentive opportunities for business to incorporate best management practices as an example of a potential strategy for addressing CSC-identified concerns related to metal processing facilities. See also Response to Comment 1-249 regarding incentives.

Response to Comment 1-257

During monitoring surveys, South Coast AQMD measures for multiple criteria and air toxic pollutants, including lead. Details on South Coast AQMD's mobile monitoring platforms and their capabilities can be found in the CAMP, along with important information on different monitoring strategies (e.g., mobile and fixed monitoring) and their specific purposes.

Response to Comment 1-258

In Chapter 5d: General Industrial Facilities, Goal F: Air Measurements Survey is added to conduct initial air measurements surveys near facilities of concern to identify and characterize any potential emissions.

Response to Comment 1-259

Language regarding collaboration with communities and businesses to encourage incorporation of best management and "Good Neighbor" practices is added as a second action bullet in Chapter 5e Goal F: Outreach to Owners and Operators. A metric is also added to correspond to this language.

As defined in Chapter 2c: Just Transition as Presented by the Community Co-Leads, "Good Neighbor agreements" include the following:

1. community access to information;
2. facilities inspections based on the community's concerns;
3. industry-developed emergency response vetted by the community; and
4. industry-developed pollution prevention plans vetted by the community.

With respect to community access to information, see Response to Comment 1-271. Additionally, as outlined in Chapter 5b: Mobile Sources, Goal A: Warehouses and Idling; and Chapter 5d, Goal E: F.I.N.D. Tool and Filing Complaints of the CERP, South Coast AQMD will provide information to the community through the online F.I.N.D. tool.

With respect to inspections based on community concerns, see Chapter 4: Enforcement Overview and History, section "Enforcement Overview". Chapter 5b, Goal C: CARB Efforts includes an action to provide outreach on CARB's complaint system; Chapter 5d, Goal E includes an action to provide outreach on South Coast AQMD's complaint line (1-800-CUT-SMOG). South Coast AQMD's enforcement activities largely fall into two categories: activities initiated by South Coast AQMD, such as routine facility inspections or targeted rule inspections; and activities where the public or an entity contacts the South Coast AQMD and an inspector responds such as, complaint investigations, facility notifications, or agency referrals.

South Coast AQMD cannot require that facilities develop emergency response plans; however, through the CERP actions in Chapters 5c: Auto Body Shops, 5d and 5e, South Coast AQMD can collaborate and conduct outreach to encourage facilities to incorporate best management and "Good Neighbor" practices. South Coast AQMD's rules are developed through a public process and all stakeholders, which includes members of the community, are encouraged to attend and provide input through this process.

Response to Comment 1-260

See Response to Comment regarding the BACT determination process.

Response to Comment 1-261

See Response to Comments 1-232 andesponse to Comment 1-260. Updates will be provided to the CSC as Proposed Rule 1460 is developed. Additionally, all stakeholders can participate in the rule development process to provide suggested best management practices for consideration

Chapter 5f: Oil and Gas Industry

Response to Comment 1-262

The additional oil and gas facility of concern is included in Chapter 5f: Oil and Gas Industry and Appendix 5f: Oil and Gas Industry. The listing of a facility is to serve as an example in section "Community Concerns" to capture the CSC voice. The listing of a facility name does not necessitate that the facility should be shut down nor has or has not been cited by the South Coast AQMD for any violations.

Response to Comment 1-263

A map showing the locations of oil and gas facilities in SLA is added in Chapter 5f (see Figure 5f-1 "Oil and Gas Facilities in SLA") and Appendix 5f (see Figure A5f-1 "Map of Oil and Gas Facilities with Active South Coast AQMD Permits in SLA").

Response to Comment 1-264

Appendix 5f includes an overview of Rules 1148.1 and 1148.2.

Response to Comment 1-265

Language is added to Goal E: Rule Amendment Feasibility in Chapter 5f to initiate rule development for the Rule 1148 Series (e.g., Rule 1148.1, Rule 1148.2), including exploring the feasibility of requiring notifications for chemicals used on site, including odorants.

Response to Comment 1-266

The proposed language regarding preparing a report of enforcement activities and finding is not included as Goal D: Enforcement Updates currently commits South Coast AQMD to providing enforcement updates to the CSC, therefore a formal report will not be provided. Although South Coast AQMD cannot discuss any ongoing investigations, enforcement updates may include but are not limited to enforcement effort summaries related to closed investigations, such as providing the number of inspections conducted as part of implementation of an air quality priority and the number of instances in which enforcement action was taken. South Coast AQMD's Annual Progress Report will also provide an overview of enforcement efforts for each designated community since their respective CERP adoption.

In Goal E, the proposed deletion of "potential" is included and the reference to Rules 1148.1 and 1148.2 has been replaced with "the Rule 1148 Series", which includes both rules. "Potential" is deleted since the rule development process for Rule 1148.2 has begun and South Coast AQMD commits to initiating rule development for Rule 1148.1 as part of implementation of this CERP.

The proposed language, "support Participatory Action Research and community data collection on emissions," is not added to Goal F: Support Community Scientists. This action focuses on

identifying opportunities to support citizen scientists to conduct community air monitoring and data analysis. "Understanding data" has been added to Goal F to clarify that South Coast AQMD will explain findings from community data collected. Participatory Action Research is not clearly defined, but South Coast AQMD supports community scientists conducting community air monitoring and understanding corresponding data related to the air quality priorities in this CERP. With respect to community data collection on emissions, emissions data cannot be derived from these types of measurements (e.g., sensors). Air quality sensors do not produce data that is accurate enough to be used for calculating emissions data.

Goal G: F.I.N.D. Tool and Filing Complaints, was removed from Chapter 5f but has been retained in Goal E: F.I.N.D. Tool and Filing Complaints for Chapter 5d: General Industrial Facilities, which will apply to all air quality priorities. Therefore, "user friendly" has been added to Chapter 5d, Goal E as a metric. South Coast AQMD is working on continuous improvements to the online F.I.N.D. tool, based on stakeholder and community feedback, including adding functionality to search by pollutants submitted by facilities in AER and to download bulk data, as appropriate. During implementation of Goal E: F.I.N.D. Tool and Filing Complaints in Chapter 5d, South Coast AQMD will obtain feedback from the CSC to determine what improvements can be made to the online F.I.N.D. tool. Detailed help materials and video tutorials are being built to make the online F.I.N.D. tool more accessible and user-friendly, and to highlight existing features such as searching for facilities by industry type and AB 617 community. Additionally, Chapter 5b: Mobile Sources, Action A: Warehouses and Idling commitments to exploring opportunities to make Rule 2305 Warehouse Actions and Investments to Reduce Emissions (WAIRE) reports available on the online F.I.N.D. tool.

Response to Comment 1-267

The proposed language is not included. A mobile monitoring platform with appropriate measurement equipment will be used to conduct these initial surveys. Fixed air monitoring equipment will be used for longer term monitoring, where appropriate (e.g., collection of remotely triggered canister samples downwind of a facility that was found to be leaking during the initial survey). These strategies were also discussed during Monitoring Working Team (MWT) meetings.

Response to Comment 1-268

The proposed language is not included as the current complaint response system does consider emergency situations. In addition, South Coast AQMD has an Emergency Response team which includes specialized staff.

Response to Comment 1-269

The proposed language is not included as there are no commercially available low-cost sensors that can reliability measure VOC emissions from oil and gas (and other) facilities. South Coast AQMD is actively working with academia and sensor manufacturers on the development of next generation air quality sensors that could be used for long term VOC monitoring, and the CSC will be informed on these efforts.

Response to Comment 1-270

The proposed language is not included. South Coast AQMD is committed to providing such updates to the CSC on a regular basis and using the opportunity to gather CSC feedback on enforcement efforts, whether they be on oil and gas or another community-identified concern (e.g., enforcement data gaps).

Response to Comment 1-271

The proposed language was not included. Public information, including notices of violations, permits to operate, Hearing Board documents, emissions data, and others are available through the South Coast AQMD online F.I.N.D. – Facility INformation Detail (F.I.N.D.) tool (https://xappprod.aqmd.gov/find) or Public Document Search tool (http://onbase-pub.aqmd.gov/publicaccess/DatasourceTemplate.aspx). For information not available on F.I.N.D. or Public Document Search, interested parties may make a Public Records Request to allow any reasonably segregable portion of a record to be make available upon request after deletion of portions that are exempted by law. Public Records Requests is the standard procedure for the public to obtain public records from any public agency, in accordance with the Guidelines for Implementing the California Public Records Act. Examples of records available to the public include monitoring and emission data. Examples of records exempt from disclosure include records of complaints, confidential communications, and trade secrets. South Coast AQMD will acknowledge receipt of a public records request within ten days of receipt and provide an approximate time frame involved in filling the request. More information on Public Records Request is available at: https://www.aqmd.gov/docs/default-source/default-document-library/Guidelines/pra-guidelines.pdf. CSC members may request information from South Coast AQMD and requests may be directly fulfilled depending on the subject, complexity, and confidentiality of the material requested. For more information related to the public records request process, please refer to https://www.aqmd.gov/nav/online-services/public-records or call the Public Records Department at 909-396-3700. Please see Response to Comment 1-266 and Response to Comment 1-270 regarding enforcement summaries.

Response to Comment 1-272

To reflect the language from the Wilmington, Carson, West Long Beach (WCWLB) CERP, Goal E: Rule Amendment Feasibility in Chapter 5f is revised from “explore expanding” to “initiate rule development.” Additionally, the reference to Rules 1148.1 and 1148.2 has been replaced with “the Rule 1148 Series.” Chapter 5f, Goal E commits South Coast AQMD to consider the following through the rule development process: requirements for injection wells; notification of workover rig operations; exploration of additional notifications for active acid work and chemicals used on site; exploration of limiting or eliminating use of odorants and chemicals used on-site; notification of modifications to any previously noticed work; and exploration for improved leak detection and repair (LDAR). Additionally, language is included from the WCWLB CERP to explore requirements for lower-emission or zero-emission equipment for on-site operations (e.g., assess feasibility to require cleaner engines).

Response to Comment 1-273

"Citizen Scientists" is revised to "Community Scientists."

Response to Comment 1-274

The proposed language is not included. As part of implementation of Goal H: Other Governmental Agency Projects, South Coast AQMD commits to identifying opportunities through collaboration with other agencies to provide information related to their authority, such as health impact studies. South Coast AQMD does not have the expertise regarding health impacts. Additionally, data and findings collected by the community cannot be validated by South Coast AQMD as air quality sensors do not produce data that is accurate enough to be used for regulatory purposes and/or to directly trigger enforcement actions.

Response to Comment 1-275

The proposed language is not included. South Coast AQMD appreciates the suggestion but requests additional information to understand the full scope of what is being requested. South Coast AQMD suggests further discussing this topic at MWT meetings and may have additional suggestions regarding educational material to address this request.

Response to Comment 1-276

The proposed language is not included, as additional discussions with the MWT and CSC are needed before South Coast AQMD staff can commit to integrating findings resulting from community led research into CERP implementation metrics. Specifically, the CSC and MWT should first identify if there are community scientists within the SLA community that are willing to engage in air monitoring research and assess their level of commitment. The group should also discuss the potential air monitoring projects the community has in mind, their feasibility and specific objectives, and how the outcome of these proposed projects will benefit SLA. The result of this conversation will inform ways South Coast AQMD can support the request for community led research and assist through its implementation. South Coast AQMD suggests further discussing this topic at MWT meetings.

Response to Comment 1-277

The proposed language is not included. Through implementation of Goal H, South Coast AQMD commits to identify and request that the appropriate agencies, provide updates to provide to the CSC regarding their relevant efforts which may include county or city departments with the authority to prohibit new oil wells or declare nonconforming land use (for more information regarding this City Council motion, please refer to https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0447). South Coast AQMD commits to working with the appropriate agencies, such as the City of Los Angeles, to request updates to the CSC when Goal H is implemented after CERP adoption.

Response to Comment 1-278

Portions of the proposed language were included in Chapter 5f, Goal I: Oil and Gas Industry Incentives, which is added to commit South Coast AQMD to explore incentive opportunities to

support implementation of best management practices and/or installation of emission reduction technologies at oil and gas facilities. South Coast AQMD does not create funding opportunities for the AB 617 program, rather the California State Legislature establishes the funding available for the AB 617 program. If the CSC decides to allocate incentive funds to reduce emissions from remaining oil wells to implement best management practices and/or install emission reduction technologies, South Coast AQMD will work the CSC and within the framework of CARB's CAP Incentives 2019 Guidelines to develop an AB 617 Project Plan. For more information regarding potential incentive opportunities for stationary sources, please refer to Appendix 5a: South Coast AQMD Regulatory Programs and Ongoing Efforts.

Chapter 6: Community Air Monitoring (CAMP) Summary

Response to Comment 1-279

There are approximately 450 general industrial and metal processing facilities and auto body shops in SLA, and more information is needed on which facilities should be prioritized for exploratory monitoring. Although South Coast AQMD cannot require facilities to incorporate "Good Neighbor" practices, nor can it require permanent monitoring at facilities of concern without rule development, there are several actions in the CERP related to encouraging "Good Neighbor" practices. Additionally, air monitoring will be conducted at all 19 oil and gas facilities in SLA as detailed in the CAMP; fixed monitoring will be conducted at facilities where the results of exploratory monitoring activities highlight the need for longer term monitoring (see CAMP section 8 "Air quality Priorities and Associated Monitoring Actions").

Response to Comment 1-280 and 1-281

Air monitoring updates, data portals, and training are addressed in the draft CAMP Section 9 "Data Reporting and Communication Plan", and additional language is added to Chapter 6.

Response to Comment 1-282

South Coast AQMD's AQ-SPEC program (http://www.aqmd.gov/aq-spec) has a pilot sensor library program in place and is working to expand the program. Educational resources are already available online, and trainings can be arranged. Information about the AQ-SPEC program and available resources are provided in the CAMP Section 6.4 "Air Quality Sensors."

Response to Comment 1-283

Information on air monitoring and MWT updates are addressed in the CAMP Section 9 "Data Reporting and Communication Plan." Potential applications and limitations of PurpleAir ™ and other air quality sensor data were discussed during the March 16, 2022 community co-leads meeting. This included discussion on which pollutants can and cannot be monitored using commercially available sensors, new sensors under development for VOC monitoring, examples of sensor network deployment for community air monitoring, and available resources. South Coast AQMD also commented on the fact that air quality sensors do not produce data that is accurate enough to be used for regulatory purposes and/or to directly trigger enforcement actions.

Comment Letter #2 – Rita M. Loof (RadTech)

March 17, 2022

Mr. Paul Rodriguez
Assistant Air Quality Specialist
South Coast Air Quality Management District
prodriguez@aqmd.gov

Re: Public Comments Preliminary Draft Community Emissions Reduction Plan (CERP)
South Los Angeles

Dear Mr. Rodrigues:

RadTech participated in the most recent CERP workshop and is pleased to comment on the Preliminary Draft. Our Association represents over 800 members involved in Ultraviolet/Electron Beam/Light Emitting Diode (UV/EB/LED) technology. Our processes are all electric environmentally friendly that do not require add-on controls, thereby eliminating combustion contaminants and Greenhouse gases. Additionally, our sister association-- the International Ultraviolet Association Inc. (IUVA)—represents the disinfection industry and can play a pivotal role in air filtration projects that are currently part of AB 617.

Our specific comments follow:

Chapter 2: Community Outreach, Community Steering Committee, and Public Process

The draft CERP recognizes that community engagement is essential to the success of the CERP and the AB 617 program as a whole. We would propose enhancing the existing outreach efforts by providing a resource page on the AB617 web page that would include links to industry trade associations such as ours and the International Ultraviolet Association Inc. (IUVA). Many businesses feel more comfortable requesting information about conversion to less polluting processes from non-regulatory agencies such as RadTech and IUVA. The district's website currently includes a list of resources to private providers and it is our hope that this approach can be extended to RadTech and IUVA. 2-1

We would also urge the district to convene a conference to discuss alternatives to polluting processes. Our member companies are experts in their field and would welcome such partnership.

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution

As stated during the public workshop, district rules can act as barriers to the implementation of cleaner technologies such as UV/EB/LED. We urge the district to provide incentives for facilities to produce emission reductions above and beyond what is required by district rules. We believe providing exemptions from permits for processes such as ours which exceed rule limits, is a path for further reductions of emissions and exposure and would be a way to address the community's concerns. 2-2

Chapter 5b: Mobile Sources

One of the CERP's goals is to work with local school districts and CSC members to identify and prioritize schools for air filtration systems. UV-C disinfection systems can enhance current air filtration system by eliminating bacteria, viruses and pathogens from indoor air in school settings. This would reduce school absences, hospital visits and improve public health overall. We urge the inclusion of UV-C germicidal units in the air filtration goals of the CERP. 2-3

Chapter 5d: General Industrial Facilities

We suggest establishing financial incentive programs—similar to the one for dry cleaners—to assist industrial facilities in making an early transition to non-polluting alternative technologies. The Community Steering Committee (CSC) has stressed the importance of outreach and training to industrial facilities regarding green alternatives and any financial and technical support to aid in the transition to green technologies. We urge the district to consider UV/EB/LED technology as part of the solution. 2-4

We would welcome a conversation to discuss these issues in more detail and look forward to the CERP development process.

Sincerely,

Rita M. Loof
Director, Environmental Affairs

Cc: btolliver@aqmd.gov; rrivera@aqmd.gov; khiggins@aqmd.gov; wnastri@aqmd.gov

Response to Comment 2-1

Conducting outreach is included as actions for several air quality priorities in this CERP (see Chapter 5b: Mobile Sources, Goals A: Warehouses and Idling, B: Reduce Exposure at Schools, C: CARB Efforts, and D: Mobile Source Incentives; Chapter 5c: Auto Body Shops, Goals A: Inform Community of Pertinent Rules, D: Outreach to Owners and Operators, and H: Auto Body Shops Incentives; Chapter 5d: General Industrial Facilities, Goals A: Identify Facilities of Concern, B: Identify Strategies, C: Dry Cleaners, and E: F.I.N.D. Tool and Filing Complaints; Chapter 5e: Metal Processing Facilities, Goals A: CARB Regulations and F: Outreach to Owners or Operators; and Chapter 5f: Oil ad Gas Industry, Goals A: Air Measurement Surveys and I: Oil Well Incentive Strategy) . Outreach includes actions such as workshops, presentations, events, and materials, to inform the community of applicable rules and regulations, best management practices, new funding opportunities for incentives, and information related to air quality concerns and stratigies to adress the concerns. During CERP implementation, South Coast AQMD will share these suggestions regarding a resouce page and alternatives to pollution processes conference with the Community Steering Committee (CSC) and community co-leads. However, South Coast AQMD believes that UV/EB/LED technologies are not currently applicable to any of the industry categories identified as air quality priorities for the SLA community.

As a note, South Coast AQMD's listing of any manufacturers on its website does not constitute or imply an endorsement by the South Coast AQMD nor does it certify their ability to meet the requirements of any South Coast AQMD rule.

Response to Comment 2-2

South Coast AQMD is in the process of rule development for South Coast AQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II to further assess comments raised regarding permit exemptions for UV/EB/LED curing operations. South Coast AQMD was directed to initiate the rule development for Rule 219 during the January 2022 Governing Board Meeting and provide a status report to the Stationary Source Committee at the June 2022 meeting. South Coast AQMD agrees that using UV/EB/LED as a curable technology is cleaner than other curable technologies such as an oven which will have NOx emissions. However, permits are needed if the Volatile Organic Compound (VOC)-containing coatings used with the UV/EB/LED technology are above the usage thresholds, which are generally six gallons per day or 132 gallons per month. If the operator is using non-solvent based and non-waterborne materials and maintains records, a permit is generally not required. Please refer to Rule 219.

CARB's CAP Incentives 2019 Guidelines identifies projects eligible for incentive funds and requirements for allocating the incentive funds. It is important to note, CAP incentive funds can only be used for projects or technologies supported by an adopted CERP. Therefore, during CERP implementation the CSC may have opportunities in the future, if funds are available, to allocate CAP incentive funds for projects supported by CERP actions in this CERP. These community-identified projects must adhere to CARB's CAP guidelines. For additional information regarding incentives for community-identified projects, please refer to Appendix 5a.

Response to Comment 2-3

The primary focus of air filtration is to reduce the exposure to particulate matter, and in some cases diesel particulate matter (DPM) which is a carcinogen. Health studies have determined that fine and ultrafine particulate matter (PM), including DPM, present the most significant air pollution health risk to sensitive receptors in Environmental Justice communities. Therefore, the primary focus of this CERP goal for school air filtration systems is to reduce children's exposure to PM. However, South Coast AQMD will work with the SLA CSC and local school districts during CERP implementation to identify funding for school air filtration systems and install systems that meet the goals of this CERP and reflect the community's priorities. Some examples of factors that will affect the extent of air filtration systems installed in the SLA community are funding availability, costs of air filtration systems, types of filters (CARB certified), types of systems (e.g., HVAC, portable systems), and filter ratings (i.e., minimum efficiency reporting value or MERV rating).

The use of UV-C systems is very effective in sterilizing viruses and bacteria, and very important in critical spaces like hospitals. However, the use of UV light does create ozone which may impact indoor air quality. One of the requirements for the school air filtration programs will be to use air filtration systems that are on the CARB certified list which helps ensure these systems meet an ozone emission concentration limit of 0.050 parts per million (50 parts per billion). Using high efficiency air filtration systems can also be effective in physically removing viruses and bacteria within indoor air.

Response to Comment 2-4

Chapter 5d for General Industrial Facilities includes a new action in Goal B: Identify Strategies that commits South Coast AQMD to develop information for applicants about zero-emission technologies. During the permit application process, South Coast AQMD would provide information to the permit applicants of cleaner alternative technologies (e.g., commercially available zero-emissions technology, non-toxic alternatives, information about UV/EB/LED technologies as an alternative to other combustion-based curing technologies). Additionally, an action is added in Goal A: Identify Facilities of Concern to collaborate with the CSC to improve outreach to small businesses to encourage incorporation of best management and "Good Neighbor" practices.

One of the actions for Goal B is to identify emissions and exposure reduction measures, which includes identifying incentive opportunities. During CERP implementation the CSC may have opportunities in the future, if funds are available, to allocate CAP incentive funds for projects supported by CERP actions in this CERP including community-identified alternative technologies. These community-identified projects must adhere to CARB's CAP guidelines. For additional information regarding incentives for community-identified projects, please refer to Appendix 5a.

Comment Letter #3 – Hans Kim, CSC Member (CSC Member, Aqua Professional Wet Cleaning)

Hans Kim, member of the AB617 South Los Angeles Community Steering Committee.

In 1998, I assisted my aunt in converting her Rancho Cucamonga cleaner from perchloroethylene (perc) dry cleaning to professional wet cleaning. In so doing, my aunt became the first perc dry cleaner ever to switch to professional wet cleaning.

While assisting my aunt in this transition, I learned to optimize professional wet cleaning as a commercially viable substitute able to process the full range of delicate apparel typically labelled 'Dry Clean' or 'Dry Clean Only' as a cost lower to solvent-based dry cleaning.

Beginning in 1999, I began a switch from being a distributor of hydrocarbon dry clean solvents to becoming a service provider for dry cleaners switching to professional wet cleaning. Since 2000, I have successfully converted over 100 perc and hydrocarbon dry cleaners to professional wet cleaning. Last year, for example, I assisted Jesus Perez in Riverside, who was a presser for De Anza Cleaners then took over ownership of De Anza, and then switched from hydrocarbon to professional wet cleaning.

Since 2016, I have been working with Physicians for Social Responsibility – Los Angeles on our mutual interest in transitioning dry cleaners to non-toxic zero-emission apparel cleaning technologies.

In 2019, I was asked by PSR-LA to assist in Phase 1 of their SCLA-PUSH project. As part of my assistance, I visited every cleaner in South/South Central Los Angeles to identify whether any cleaner was operating with professional wet cleaning equipment. Unfortunately, my survey did not identify a single cleaning using professional wet cleaning in South/South Central LA.

In addition, in 2019, as part of the SCLA-PUSH project, I reviewed an analysis conducted by Dr. Peter Sinsheimer, who served as a technical consultant to the project, which focused on SCAQMD Best Available Control Technology (BACT) for non-perc dry cleaning. This analysis reviewed SCAQMD's criteria for BACT, evaluated different professional apparel cleaning technologies for each criteria using reliable evidence, and concluded that zero-emission professional wet cleaning clearly met SCAQMD's criteria as BACT for non-perc dry cleaning. Based on my over twenty years of experience and expertise, I confirmed that the evidence was accurate in this analysis and affirmed the conclusion that professional wet cleaning should be used by SCAQMD as BACT for non-perc dry cleaning. 3-1

Further, I also agreed with this analysis that SCAQMD Rule 1102 should be amended to eliminate the Rule 102 Group II exemption. Currently, this exemption excludes siloxane-based solvent decamethylcyclopentasiloxane (or D5) from Rule 1102 regulation. In addition to ongoing toxicity issues related to D5 identified in Dr. Sinsheimer's study, D5 dry cleaning also requires substantially greater electricity and natural gas use compared to professional wet cleaning. 3-2

Beyond eliminating the Rule 102 Group II exemption, an amendment to SCAQMD Rule 1102 should also set a sunset date for existing non-perc dry clean machines covered by the rule. This sunset date should follow the CARB 2007 ruling phasing out perc dry cleaning, which set a sunset date of fifteen (15) years from the date that a new dry clean machine was installed. Setting a 15-year sunset date is important because older dry clean machines emit greater emissions due to the breakdown in pollution control equipment. In addition, the vast majority, if not all of non-perc dry cleaning machines use combustible solvents and older machines are likely to create greater fire hazards. 3-3

In addition to these changes in BACT classification and Rule 1102 modifications, incentives should be developed for dry cleaners to switching to zero-emission alternatives and a robust and sustained professional wet cleaning demonstration program should be developed to jump start the transition to this zero emission technology.

In reviewing the initial draft CERP for dry cleaning summarized in Table 5d-1, based on my comments above, I recommend the following changes to this table:

Under columned entitled "Action", delete all items and replace with following:

- Set acceptable emissions from non-perc solvent-based dry clean systems regulated by Rule 1102 to zero, based on viability of zero-emission alternatives. 3-4
- Phase out existing non-perc dry clean solvent machines after useful life and remove regulatory exemptions for non-perc dry clean solvent machines 3-5
- Create incentive opportunities to transition to professional wet cleaning (and other commercially viable zero-emission technologies when identified) 3-6
- Community outreach to owners and operators regarding regulatory changes, incentives for zero-emissions technologies, and demonstration workshops on professional wet cleaning (and other commercially viable zero-emission technology when identified) 3-7

Under column entitled "Matric(s)" and "Timeline", delete and replace with following:

- Modify BACT (Best Available Control Technology) for non-perc solvent dry clean machines using professional wet cleaning, setting the acceptable emissions at zero. Start: 3rd quarter 2022, End 4th quarter 2022. 3-8
- Amend Rule 1102 to eliminated Rule 102 Group II exemption [by striking (b) 13 and (h) II] and phase out non-perc dry clean machines after fifteen years for the date of installation. Start: 3rd quarter 2022, End: 3rd quarter 2023. 3-9

- Provide list of incentive opportunities to support transition to professional wet cleaning, (and other commercially viable zero-emission technology when identified). Start: 3rd quarter 2022. End: 2027. At the end of 5th year, assess need for additional incentives. 3-10

- Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102 permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of new BACT classification for non-perc solvents machines. Start: 4th quarter 2022. Timed immediately after new zero-emission BACT set. 3-11

- Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102 permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of Rule 1102 rule change. Start: 3rd quarter 2023. Timed after Rule 2023 amendment completed. Start: 3rd quarter 2022. End: 2027. Assessment end date based on assessment of need for need to extend demo program. 3-12

- Support creating professional wet cleaning demonstration program to jump start transition to zero emission professional apparel cleaning alternatives. Start: 3rd quarter 2022. End: 2027. Assessment end date based on assessment on need to extend incentives and/or demo program. 3-13

Response to Comment 3-1

See Response to Comment 1-232.

Response to Comment 3-2

The South Coast AQMD follows the guidance provided by California Air Resources Board (CARB) with regard to solvents used in dry cleaning. D5 is listed as one of those suitable solvents along with water-based, carbon dioxide, and hydrocarbon cleaning. While CARB does not consider D5 a Volatile Organic Compound (VOC), thus an "exempt" compound, it has also not undergone a formal evaluation as a toxic air contaminant with the Office of Environmental Health Hazard Assessment (OEHHA). California Health and Safety Code 59004 provides OEHHA authority as the responsible agency for conducting health risk assessments of chemical contaminants found in the air. South Coast AQMD utilizes these procedures and assessments established by OEHHA. Thus, the permitting process accounts for only those toxic air contaminants listed under South Coast AQMD Rule 1401 and D5 is not identified as a toxic air contaminant in Rule 1401.

OEHHA did conduct an evaluation of available information on D5 and concluded the use of D5 as a dry cleaning solvent will not pose a risk to the public living near a dry cleaning business using D5. If OEHHA conducts a formal evaluation of D5 and establishes health risk data, the South Coast AQMD will incorporate this information during the evaluation of new dry cleaning machines using D5.

South Coast AQMD Rule 1102 does not address electricity or natural gas, however, businesses generating air pollutants and requiring an air quality permit would be subject to CEQA under which an analysis of potential adverse environmental impacts, including energy and fuel, are evaluated and mitigated, as necessary. It is unlikely that a commercial dry cleaner would have energy impacts that would be significant. Further, businesses take factors such as increased electricity use, increased cost of solvent, or increased process times when considering different technologies which could disincentive the use of D5 dry cleaning operations.

Response to Comment 3-3

With the long lead time to phase out PERC (18 years), some local dry cleaners just recently replaced their PERC machines with an alternative, such as water-based, carbon dioxide, or hydrocarbon dry cleaning machines. It is important to note the South Coast AQMD has no information that these solvents are toxic and as discussed in Response to Comment 3-2, OEHHA has not conducted a formal evaluation. The 2016 AQMP prioritized VOC reductions that reduced toxics or had co-benefits of reducing other criteria pollutants. Since solvents used in hydrocarbon dry cleaning are not toxic, there is not currently a toxicity concern. From a regional air quality perspective, the incremental amount of VOC emissions from an individual dry cleaner is approximately 0.0006 tons per day. South Coast AQMD is technology neutral and does not require a specific technology allowing owners or operators to select any technology to comply with the requirements set forth in the rule.

The CERP includes a new action that commits South Coast AQMD to initiate a process to amend Rule 1102 to consider a new standard reflecting zero-emissions technologies for new dry cleaning systems. South Coast AQMD will pursue the action to amend Rule 1102 as described in the CERP action. During rule development South Coast AQMD will work with stakeholders and take into consideration technical feasibility, operator acceptance, and cost-effectiveness. The proposed amended rule will then be presented to the Governing Board for adoption. With regard to water-based cleaning, the agency does incentivize that process by not requiring a permit. Hydrocarbon cleaning are closed loop systems restricted from exhausting to the atmosphere or workroom during operation. In addition, these systems are required to comply with BACT which currently includes chilled water cooled or refrigerated vapor condenser to minimize VOC emissions.

Response to Comment 3-4

See Response to Comment 1-242a.

Response to Comment 3-5

See Response to Comments 1-242c and 1-242d.

Response to Comment 3-6

See Response to Comments 1-242e and 1-242f.

Response to Comment 3-7

As part of the rule development process South Coast AQMD identifies and notifies all applicable facilities and interested stakeholders of potential changes so that they may participate in the rule development and provide comment.

See Response to Comments 1-242i and 1-242j.

Response to Comment 3-8

See Response to Comment 1-232.

Response to Comment 3-9

See Response to Comments 1-242c and 1-242d.

Response to Comment 3-10

See Response to Comments 1-242e and 1-242f.

Response to Comment 3-11 and 3-12

See Response to Comment 1-242g and 1-242h.

Response to Comment 3-13

See Response to Comment 1-242i and 1-242j.

Comment Letter #4 – Peter Sinsheimer (Technical Consultant to SCLA-PUSH)

March 17, 2022

From: Peter Sinsheimer, Technical Consultant to SCLA-PUSH

To: South Coast Air Quality Management District

Re: Comments on March 2022 Draft SLA CERP related to dry cleaning

My comments below are being made in my role as technical consultant to SCLA-PUSH's project focused on air quality.

By way of background, between 1994-1997, as a PhD student at UCLA, I served as a senior researcher associated on a SCAQMD/CARB/USEPA project focused on the potential viability of professional wet cleaning based on the evaluation of the first professional wet cleaner to operate in California. Between 2000-2004 I served as project director of the SCAQMD-funded project focused on converting the first set of perchloroethylene (perc) dry cleaners to convert to professional wet cleaning. Between 2005-2014 I served as director of the CARB-funded professional wet cleaning demonstration project. In addition, I served as the lead scientist on a utility-funded project – sponsored by SCE, SCGC, and LADWP, focusing on a comparative analysis of electricity and natural gas use of a range of professional apparel cleaning technologies.

In 2019, Physicians for Social Responsibility – Los Angeles, ask me to serve as technical consultant on their SCLA-PUSH project. As part of this project, I was asked to evaluate Best Available Control Technology associated with targeted sectors including professional apparel cleaning services. During Phase 1 of this project, I completed an analysis of SCAQMD criteria for BACT, evaluated evidence related to a range of professional apparel cleaning technologies related to each criteria, used this evidence to assess the extent to which each technology met each SCAQMD BACT criteria, and concluded that there was strong reliable evidence that both professional wet cleaning CO_2 dry cleaning met each SCAQMD criteria of BACT with professional wet cleaning being extremely cost-effective given that operating cost of this zero-emission technology was lower than no-perc dry cleaning technologies that SCAQMD regulated.

Based on this analysis, the SCLA-PUSH document entitled "Report on the First Phase of Air Quality Assessment in South Central Los Angeles, 2019-2020" listed professional wet cleaning and CO_2 dry cleaning as BACT for non-perc dry cleaning (see page 48). That said, due to page constraints of this report, the analysis I completed underlying this finding was not included. In consideration of the SLA CERP, I believe my 2019 analysis supporting this conclusion is important to provide.

Further, this analysis also recommended amending SCAQMD Rule 1102 eliminating the Rule 102 Group II exemption, including the exemption excludes siloxane-based solvent decamethylcyclopentasiloxane (or D5) from Rule 1102 regulation. Toxicity risk associated D5

4-1

has resulted in the European Union banning D5, including its use on dry cleaning. Further, the extremely high energy use associated with D5 dry cleaning compared to zero-emission professional wet cleaning and CO_2 dry cleaning further supports removing the Rule 102 Group II exemption to Rule 1102. 4-1 cont.

In additional, an amendment to SCAQMD Rule 1102 should be created phasing out non-perc dry cleaning machines regulated under this rule based on a fifteen (15) year life of this equipment. Since listing zero-emission professional wet cleaning and CO_2 dry cleaning would prohibit further permitting by SCAQMD on new non-perc dry cleaning machines, a phase out of existing non-perc dry cleaning machines regulated under Rule 1102 should be created based on the 15-year expected useful life of this equipment. This rule change is comparable to the CARB 2007 ruling phasing out perc dry cleaning based on a 15-year useful life of perc dry cleaning equipment. Phasing out existing non-perc dry cleaning machines is essential given that older machines are more prone to break down control systems, including break down in pollution control equipment resulting in greater emissions as well as break down fire suppression equipment for non-perc dry clean machines using combustible solvents. Most, if non all non-perc dry cleaning machines regulated under Rule 1102 use combustible solvents. 4-2

As non-perc dry cleaning machines regulated by SCAQMD Rule 1102 are being phased out, an early-adopter incentive program for dry cleaners switching to viable zero-emission alternatives should be created to jump start this transition. This early adopter incentive program should be coupled with a zero-emission technology demonstration program to further enhance this transition. 4-3

Beyond the community emissions reduction benefits created by transitioning from non-perc solvent-based dry cleaning technologies regulated by Rule 1102 to viable zero-emission professional wet cleaning and CO_2 dry cleaning, from the perspective of dry cleaners switching professional wet cleaning, reliable evidence demonstrates that they will experience greater profitability based on lower operating costs. From the perspective of SCAQMD, given that neither professional wet cleaning and CO_2 dry cleaning machines require SCAQMD permits, the benefits of phasing out non-perc dry cleaning regulated by Rule 1102 and transitional cleaners to zero-emission equipment not regulated by SCAQMD will demonstrate to the professional apparel cleaning community in particular and the broader business community in general that SCAQMD supports reduced regulatory oversight. 4-4

While the above serves as an overall summary of recommendations to the March 2022 draft SLA CERP, below I am providing the following. Appendix 1: A recent memo I sent to my PSR-LA colleagues, which included the complete 2019 analysis of BACT for non-perc dry cleaning equipment regulated under Rule 1102. Appendix 2: Track change recommendations to Table 5d-1 related to the SLA CERP for dry cleaning as support by my 2019 BACT analysis as well as the comments provided above.

Appendix 1

March 16, 2022 Memo to Physicians for Social Responsibility – Los Angeles on 2019 Analysis of Professional Wet Cleaning and CO_2 Dry Clean as BACT for Non-Perc Dry Cleaning Machines Regulated by SCAQMD Rule 1102

March 16, 2022

To: Paula Torrado, Marth Arguello – Physicians for Social Responsibility Los Angeles

From: Peter Sinsheimer – Green Analytics

Re: Professional wet cleaning as SCAQMD BACT for non-perc dry cleaning machines

As you know, the SCLA-Push document "Report on the First Phase of Air Quality Assessment in South Central Los Angeles, 2019-2020" identified dry cleaners as a targeted sector of high concern and classified zero-emission professional wet cleaning and CO_2 dry cleaning as best available control technology (BACT) for non-perchloroethylene (perc) dry cleaning solvent machines regulated by South Coast Air Quality Management District. As you requested, as a technical consultant on this First Phase work, I completed this analysis of BACT for non-perc dry cleaning. Below is the detailed analysis demonstrating that professional wet cleaning clearing meeting SCAQMD's criteria as BACT for non-perc dry cleaning. 4-5

1. INTRODUCTION

Within the SCAQMD, Regulation XIII requires BACT be used by facilities applying for permits for new sources, relocated sources, and modifications to existing sources that may result in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia. SCAQMD periodically updates their BACT Guidelines which establish both the procedures determining BACT as well as the actual BACT for commonly permitted equipment."[i] SCAQMD invites written comments about BACT Guidelines and written comments are evaluated by SCAQMD staff and included in the BACT Docket.[ii]

SCAQMD divides facilities into two BACT groups – major polluting facilities and non-major polluting facilities.[iii] The SCAQMD document *Best Available Control Technology Guidelines* developed different policies and procedures for major and non-major polluting facilities. For major sources, BACT uses a Lowest Achievable Emission Rate (LAER) standard, evaluating what is achievable in practice with little consideration of cost. For non-major sources BACT, or MSBACT, BACT is based on the most stringent standard considered to be cost-effective.

In the SCAQMD BACT Guidelines, two parts focused specifically on MSBACT. "Part C – Policy and Procedures for Non-Major Polluting Facilities" provides specific criteria for determining MSBACT for each regulated equipment type or emission limit. "Part D: BACT Guidelines for Non-Major Polluting Facilities" provides the specific MSBACT requirements for each applicable piece of equipment or emissions limit.[iv]

Part D identified dry cleaning as a specific process applicable to MSBACT.

2. METHODS: MSBACT DRY CLEANING CASE STUDY

Methods used to evaluate the MSBACT for dry cleaner followed the following steps: (1) Review of MSBACT guidelines for developing MSBACT for a specific application, (2) Review of the current MSBACT for dry cleaning, and (3) Using MSBACT guidelines and a literature review of dry clean alternatives, complete an analysis to determine whether there is sufficient evidence to update the MSBACT for dry cleaning.

3. FINDINGS: MSBACT DRY CLEANING CASE STUDY

3.1 Procedures for Developing MSBACT for a Specific Application

Part C of the SCAQMD BACT guidelines entitled "Part C – Policy and Procedures for Non-Major Polluting Facilities" states that MSBACT for each source category is the most stringent emission limit or control technology that is either: (1) found in a state implementation plan (SIP), or (2) achieved in practice (AIP), or (3) is technologically feasible and cost effective. Of these options, SCAQMD states most MSBACT is based on AIP since it is more stringent that SIP and less constrained by state law than the technologically feasible/cost effective approach.

Part C cites a number of information sources where AIP may be identified including regional, state, and federal clearinghouses, regional and state BACT guidelines, and regional and state permits as well as "any other source for which the requirements of AIP can be demonstrated."

Given that SCAQMD uses AIP to establish most MSBACT, below provides additional detail in Part C on AIP.

PART C states four criteria used by SCAQMD for listing an AIP control technology or emissions limit:

- Commercial Availability: At least one vendor must offer this equipment for regular or full-scale operation in the United States. A performance warranty or guaranty must be available with the purchase of the control technology, as well as parts and service.

- Reliability: The control technology must have been installed and operated reliably for at least twelve months on a comparable commercial operation. If the operator did not require the basic equipment to operate continuously, such as only eight hours per day and 5 days per week, then the control technology must have operated whenever the basic equipment was in operation during the twelve months

- Effectiveness: The control technology must be verified to perform effectively over the range of operation expected for that type of equipment. If the control technology will be allowed to operate at lesser effectiveness during certain modes of operation, then those modes must be identified. The verification shall be based on a District-approved performance test or tests, when possible, or other performance data.

- Cost Effectiveness: The control technology or emission rate must be cost effective for a substantial number of sources within the class or category. Cost effectiveness criteria are described in detail in a later section. Cost criteria are not applicable to an individual permit but rather to a class or category of source. PART C includes an extensive section on cost effectiveness methodology to be applied.

Part C then describes a five-step decision method for selecting MSBACT for each category of regulated equipment or emissions unit.

- Step 1: Identify all possible control technologies. In searching for options, Part C highlights a search for pollution prevention alternatives, cites the 1990 federal Pollution Prevention Act as establishing a "national policy that pollution should be prevented or reduced at the source whenever feasible" (p. 42), and lists five relevant pollution prevention/source reduction approaches:
  - Equipment or technology modifications
  - Process or procedure modifications
  - Reformulation or redesign of products
  - Substitution of raw materials
  - Improvements in housekeeping maintenance or inventory control

- Step 2: Eliminate technically infeasible options. This step is essentially comparable to the "effectiveness" criteria above.

- Step 3: Rank remaining control technologies. This ranking is based on the overall control effectiveness of the relevant pollutant(s). Part C states that this ranking not only be based on control efficiencies/emission rates/emission reduction but also take into account environmental impacts (e.g., toxic emissions, multi-media impacts) and energy impacts.

  Here it is important to note that these indirect environmental impacts are characterized in the next step and can be used as a basis for eliminating the highest-ranking option. It is also important to note that a pollution prevention alternative which eliminate the relevant pollutant(s) is likely to be selected as the highest-ranking option, being more stringent than options which reduce but do not eliminate the relevant pollutant(s).

- Step 4: Evaluation. The "most effective" options ranking highest is evaluate first. Part C provides some guidance on this evaluation – discuss each of the beneficial and adverse impacts, focus on direct impacts including a calculation of both incremental and average cost effectiveness. Part C provides detailed guidance on conducting cost effectiveness calculations If the evaluation of the "top option" is ruled out based on impacts and cost effectiveness, the next "most stringent alternative is evaluated.

It is important to note here that while the guidance provided in Part C for this evaluation is extremely clear on ruling out an option based on cost effectiveness, given the amount a detail provided on cost effectiveness in Part C, with respect to other impacts, Part C is extremely value concerning what constitutes a sufficient threshold from other impacts sufficient to rule out an option. Further, Part C in vague about what specific impacts are included. Presumably, these include the impacts listed in Step 3 -- environmental impacts (including toxic emissions and multi-media impacts) and energy impacts.

- Step 5: Select BACT. The most stringent option not eliminated in Step 4 is proposed as BACT and presented to SCAQMD for review and approval.

3.2 Current MSBACT for Non-Perc Dry Cleaning

Two SCAQMD rules are specifically related to dry cleaning: SCAQMD Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems and Rule 1102: Dry Cleaners Using Solvent Other Than Perchloroethylene. These two rules specify minimum equipment requirement and specify best practices associated with cleaners using perchloroethylene (Rule 1421) and non-perchloroethylene dry clean solvent.

Part D of the 2019 SCAQMD BACT Guidelines lists "Dry Cleaning" as a specific equipment or process category. Table 1 is a screenshot of the dry cleaning table listed on Part D.

The table shows MSBACT for dry cleaning was first created in 10-20-2000 "Rev. 0" and revised on 7-9-2004 "Rev. 1". The first column in the table, labeled "Subcategory/Rating/Size" lists two subcategories of dry cleaning equipment: Perchloroethylene and Petroleum Solvent. Within the row labeled "Criteria Pollutants", information on the two dry clean equipment sub-categories is provided for only one criteria pollutant, VOC/ODC. This listing of VOC/ODC shows that petroleum dry cleaning is directly associated with VOC/ODC emissions.

In the VOC/ODC column, perchloroethylene dry cleaning was said to be "delisted" as a VOC, citing SCAQMD Rule 1421 from June 13, 1997. As such, perchloroethylene dry cleaning was found to be exempted from MSBACT control technology or emissions reduction specifications. Here it is important to note that in 2002, SCAQMD amended Rule 1421, phasing out permitting of perc dry clean machines by December 2020.

For petroleum solvent dry cleaning, the table drops a footnote after "Petroleum Solvent" stating: "This Equipment may also be subject to AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene." The Petroleum Solvents/VOC/ODC cell states: "Closed Loop, Dry-to-Dry Machine with a Refrigerated Condenser (10-20-2000) or Evaporatively Cooled Condenser (7-9-2004)." The two dates listed here are the identical dates for when this MSBACT for dry cleaning was first created and when it was revised, as shown in the top right corner of the table.

Table 1: SCAQMD MSBACT for Dry Cleaning

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0
7-9-2004 Rev. 1

Equipment or Process: Dry Cleaning

	Criteria Pollutants					
Subcategory/ Rating/Size	**VOC/ODC**	**NOx**	**SOx**	**CO**	**PM_{10}**	**Inorganic**
Perchloroethylene	Delisted as a VOC. See SCAQMD Rule 1421 – Control of Perchloroethylene Dry Cleaning Operations[1] (06-13-97)					
Petroleum Solvent[2]	Closed Loop, Dry-to-Dry Machine with a Refrigerated Condenser (10-20-2000) or Evaporatively Cooled Condenser (7-9-2004)					

[1] Rule 1421 implements the federal National Emission Standard for Hazardous Air Pollutant for Perchloroethylene Dry Cleaning Facilities (40 Code of Federal Regulations [CFR] 63.320, *et seq*) and the state Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations (17 California of Regulation [CCR] 93109, *et seq*).

[2] This Equipment may also be subject to AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene.

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

BACT Guidelines - Part D 43 Dry Cleaning

As such, the latest version SCAQMD's BACT Guidelines states that MSBACT for petroleum solvent dry cleaning are three emission control requirements build into a petroleum dry clean machine for reducing VOC emissions – (1) dry-to-dry – meaning apparel is put in dry and comes out dry thereby requiring that washing and drying be completed in the same drum, (2) closed loop – meaning that petroleum solvent evaporated during the dry cycle is captured and collected rather than being vented to the atmosphere, and (3) that the solvent capture system be condenser using either a refrigerant system or an evaporative cooling system.

To understand projected VOC emissions associated with this MSBACT for petroleum dry cleaning, it is fruitful to evaluate a 2007 SCAQMD document developed for permit streamlining entitled "PERMIT SAMPLE EVALUATION HYDROCARBON DRY CLEANING MACHINE (Based on applicable Rules & Regulations as of September 2007).[v] This six-page document is shown in Appendix A.

Page 2 of this document includes a heading entitled "EMISSIONS CALCULATIONS", shown in Figure 1 below, provides details related to how hydrocarbon emissions is projected for the applicant: the assumed volume of clothes cleaned of 600 lb/week, an estimated amount of hydrocarbon solvent use to process 600 lb/week of 10 gallons/month, an estimated 34% of the 10 gallons used will be emitted as VOCs, a density of hydrocarbon solvent of 6.41 lbs/gallon, and that monthly VOC emissions attributed to this activity comes to 21.8 pounds (10 gallons/month

* 34% * 6.41 lbs/gallon). In sum, a typical hydrocarbon dry cleaner cleaning 600 pounds of items a will use 10 gallons to hydrocarbon solvent per month, that 3.4 gallons/month is attributable to VOC emissions, and based on, 21.8 lb VOC/month, or 262 lb VOC/year.

EMISSION CALCULATIONS

Capacity [lb/load] :		50
Maximum Hydrocarbon consumption [gal/month] :		10
Clothes cleaned per week [lb/week] :		600
Density of HC/petroleum [lbs/gal] :		6.41
VOC emitted from HC dry cleaning system (based on Rule 1421 status report, 12/3/2004) :		34%
Control Efficiency (District policy on 12/3/2003) :		66%
Operating Schedule:	hr/day (average) =	9
	hr/day (max) =	10
	day/week =	6
	week/yr =	52

VOC Emission		Uncontrolled	Controlled
Monthly [lbs/mo]	= HC consumption x Petroleum density	64.1	21.8
Daily [lbs/day]	= Monthly / 4.33/ Max No of day per week	2.47	0.8
Hourly [lbs/hr]	= Daily / Max hours per day	0.25	0.08
Annual [lbs/year]	= Monthly controlled x 12 months	-	262
30-day avg [lbs/day]	= Monthly controlled/ 30 days	-	0.73

Figure 1: Hydrocarbon emissions calculation estimates from a SCAQMD a permit sample evaluation

3.3 Options Analysis for MSBACT for Non-Perc Dry Cleaning

An analysis of the literature shows a number of potential pollution prevention options that SCAQMD could considered as MSBACT for petroleum dry cleaning creating more stringent emission limits than the dry-to-dry closed-loop pollution control system currently listed as MSBACT. These potential pollution prevention options all use solvents not classified as VOCs including GreenEarth dry cleaning – using a siloxane-based solvent decamethylcyclopentasiloxane (or D5), CO_2 dry cleaning – using recycled CO2 as a solvent, and professional wet cleaning – using water as a solvent.

The first step in evaluating whether each of these zero-VOC alternatives could be used as MSBACT for petroleum dry cleaning is to assess each alternative with respect to the initial four baseline criteria stated in MSBACT guidance – commercial availability, reliability, effectiveness, and cost effectiveness. With respect to the first three, there is substantial evidence that GreenEarth, CO_2, and professional wet cleaning meet the minimum thresholds for each criterion detailed in SCAQMD BACT Guidelines PART C. The fact that SCAQMD has tracked professional

apparel cleaners in their own service territory using GreenEarth, CO_2, and professional wet cleaning over many years demonstrates the effectiveness and reliability of each of these options. For professional wet cleaning, additional support on effectiveness and reliability comes from a pair of peer review studies confirming the commercial viability of dry cleaners switching to professional wet cleaning in the greater Los Angeles region and in Massachusetts.[vi] With respect to cost-effectiveness, the fourth baseline criteria, each of these zero-VOC technologies meet the classification as cost-effectiveness based on the methods provided in the SCAQMD BACT Guidelines PART C, which uses $92,246/ton of ROG/VOC reduction as the threshold. For CO_2 dry cleaning and GreenEarth dry cleaning, cost per ton of ROG/VOC reduction are substantially lower than this threshold. For professional wet cleaning, with capital and operating costs being lower than petroleum dry cleaning, this technology shows a cost savings per ton of ROG/VOC reduced associated with cleaners switching to this technology option.[vii]

Since each of these zero-VOC technologies passes the four baseline criteria, the next step is to work through the SCAQMD's MSBACT Guidelines 5-step decision method for selecting MSBACT.

- Step 1, identifying possible control technologies: Each of these solvent substitute technologies can be considered a pollution prevention alternative, highlighted in the MSBACT PART C Guidelines as highly desirable.

- Step 2, eliminating technically infeasible options: As noted above, commercial viability on each zero-VOC alternatives, demonstrates all three options as passing through this gate.

- Step 3, rank remaining control technologies: MSBACT guidelines requires ranking to take into account both emissions reduction as well as other factors including environmental impacts. Each of these options eliminates VOC emissions associated with petroleum dry cleaning. With respect to toxicity, CO_2 dry cleaning and professional wet cleaning have been classified by the California Air Resources Board (CARB) as non-toxic and non-smog forming technologies; CARB created this classification in response to its authority to implement California law AB998 which provides incentives to perc dry cleaners switching to "non-toxic and non-smog-forming alternatives."[viii] While GreenEarth's D5 solvent does not appear to be smog-forming, CARB did not classified GreenEarth's D5 solvent as "non-toxic and non-smog-forming", specifically noting problems with toxicity concerning with D5.[ix] Further, in 2018 the European Union's regulatory agency implementing the EU's chemical legislation (ECHA) recently classified D5 as both a PBT (Persistent, Bioaccumulative, and Toxic), vPvB (very persistent and very Bioaccumulative), a substance of very high concern, placing D5 on a list of chemicals to be banned unless no other viable substitutes can be identified for a specific use.[x] Since MSBACT takes into account environmental impacts in rank ordering options for the most stringent emissions reduction, CARB's decision to reject listing D5 as non-toxic and ECHA's classification of D5 as a PBT and vPvB substance, suggests eliminating D5 as an option for MSBACT. At a minimum, GreenEarth would rank substantially lower than CO_2 and professional wet cleaning. These findings also suggest increased regulation of D5 dry cleaning by SCAQMD in Rule 1102 (see below).

- Step 4: Evaluation. While this step requires the "most effective" option be evaluated first, CO_2 dry cleaning and professional wet cleaning are tied as most effective given that both eliminate VOCs from petroleum dry cleaning, both are classified as non-toxic, and no other environmental impact

clearly separates these two alternatives at this time.[xi] The MSBACT Guidelines do provide some specific guidance for this evaluation step, including takings into account cost effectiveness calculations. As noted above, while both CO_2 and professional wet cleaning meet MSBACT Guidelines threshold as cost effective technologies, while CO_2's incremental cost effectiveness was estimated at slightly over $30,000 per ton of VOC reduced, a switch to professional wet cleaning resulted in a cost savings of slightly over $15,000 per tons of VOC reduced. As such, based on the evaluation criteria in MSBACT Guidelines, professional wet cleaning appears as the highest ranked "most effective" VOC-free alternative with no adverse impacts identified that would rule out this option.

- Step 5: Select BACT. Since professional wet cleaning was shown as the most stringent option not eliminated in Step 4, professional wet cleaning should be proposed as MSBACT for petroleum dry cleaning and be presented to SCAQMD for review and approval.

4. CONCLUSION: PROFESSIONAL WET CLEANING AS MSBACT DRY CLEANING

Based on SCAQMD MSBACT 5-step decision method guidelines, reliable evidence related to each criterion shows that zero-emission professional wet cleaning clearly meet the selection criterion as MSBACT for non-perc solvent-based dry cleaning.

The practical consequence of setting professional wet cleaning as BACT for non-perc dry cleaning is to prohibit further permitting of new non-perc dry cleaning in SCAQMD.

This classification of professional wet cleaning as BACT for non-perc dry cleaning should, in turn, trigger an amendment to Rule 1102 to include a phase out date for existing non-perc dry cleaning machine based on a fifteen year expected life.

The amendment of Rule 1102 provides SCAQMD the opportunity to remove the Rule 1102 exemption of siloxane-based D5 dry cleaning. As revealed in Step 3 of MSBACT completed above, based on an analysis of current toxicity evidence of D5, the European Union is move forward with steps to ban D5 from dry cleaning. Amending Rule 1102 provide SCAQMD the opportunity to remote D5 from the exemption list based on evidence substantially more recent than the date when Rule 1102 was last revised.

Appendix A: SCAQMD: PERMIT SAMPLE EVALUATION HYDROCARBON DRY CLEANING MACHINE

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

ENGINEERING EVALUATION FOR PERMIT TO CONSTRUCT/OPERATE

APPLICANT ABC CLEANER (Facility ID: 123456)

MAILING ADDRESS 12345 Abc St., Chino Hills, CA 91709

EQUIPMENT LOCATION Same as above.

PERMIT HISTORY

The permit application for the hydrocarbon dry-cleaning machine was filed on August 16, 2007 as a new construction. This unit will replace the existing perchloroethylene dry-cleaning machine to comply with the requirements of Rule 1421 and Rule 1402.

There is no history of any violation or nuisance complaints for this facility.

Fees: Fee Schedule A. Permit Processing fee for new construction is $1170.20 for fiscal year 2007-2008.

EQUIPMENT DESCRIPTION

DRY CLEANING MACHINE, PETROLEUM SOLVENT, UNION MODEL HL-850, CLOSED LOOP, WITH A REFRIGERATED CONDENSER.

BACKGROUND/SUMMARY

This model, Union HL 850 has a design capacity of 45-50 pounds. The solvent used in this machine is DF 2000 Fluid, distributed by Exxon Mobil Chemical (MSDS included). This is a synthetic, C12 to C13 aliphatic hydrocarbon with a density of 6.41 pounds/gallon. This unit has a mileage of 120 pounds cleaned a day.

CEQA ANALYSIS

This equipment is not part of a project that is subject to CEQA. There is no significant impact.

EMISSION CONTROL DESCRIPTION

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Permit Streamlining AQMD

PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

This unit has a refrigerated condenser to reduce solvent losses during the cleaning and drying processes. Based on a staff report for Rule 1421 (December 3, 2004), it is estimated that the unit is 66% efficient in controlling the hydrocarbon emissions.

EMISSION CALCULATIONS

Capacity [lb/load] :	50
Maximum Hydrocarbon consumption [gal/month] :	10
Clothes cleaned per week [lb/week] :	600
Density of HC/petroleum [lbs/gal] :	6.41
VOC emitted from HC dry cleaning system (based on Rule 1421 status report, 12/3/2004) :	34%
Control Efficiency (District policy on 12/3/2003) :	66%

Operating Schedule:	hr/day (average) =	9
	hr/day (max) =	10
	day/week =	6
	week/yr =	52

VOC Emission		Uncontrolled	Controlled
Monthly [lbs/mo]	= HC consumption x Petroleum density	64.1	21.8
Daily [lbs/day]	= Monthly / 4.33/ Max No of day per week	2.47	0.8
Hourly [lbs/hr]	= Daily / Max hours per day	0.25	0.08
Annual [lbs/year]	= Monthly controlled x 12 months	-	262
30-day avg [lbs/day]	= Monthly controlled/ 30 days	-	0.73

RULES EVALUATION

RULE 212 – STANDARDS FOR APPROVING PERMITS

No public notice required as none of the criteria for public notice listed below is triggered.

(c)(1): Unit located within 1,000 feet of the outer boundary of a school.
(c)(2): Emission increases exceeding the daily maximums specified in subdivision (g) of this rule (VOC limit is 30 lbs per day)
(c)(3): Increases in emissions of toxic air contaminants such that Maximum Individual Cancer Risk (MICR) of greater than 1 x 10^{-6} for facilities with more than one permitted unit and greater than 10 x 10^{-6} for facilities with one permit unit.

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PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

RULE 401 – VISIBLE EMISSIONS

Compliance is expected with well maintained and properly operated equipment.

RULE 402 – NUISANCE

No nuisance is expected with well maintained and properly operated equipment.

RULE 442 - USAGE OF SOLVENTS

Monthly VOC emissions from this equipment are less than 833 pounds/month.

RULE 1102 - DRY CLEANERS USING SOLVENT OTHER THAN PERCHLOROETHYLENE

The dry cleaning machine is equipped with a refrigerated vapor condenser which is a primary control system for the equipment. Liquid leaks and solvent exposure to the atmosphere are expected to be minimal with proper care and maintenance. Compliance is expected.

REGULATION XIII – NEW SOURCE REVIEW

RULE 1303(a) – BEST AVAILABLE CONTROL TECHNOLOGY (BACT)
Emission increase is more than one pound per day for VOC, so BACT is applicable.
This is a minor source BACT. Per Part D of the BACT guidelines [http://www.aqmd.gov/bact/part-d-final-7-14-2006-update.pdf], current BACT for dry cleaning equipment using petroleum solvent is a closed loop, dry-to-dry machine with a refrigerated condenser or evaporative cooled condenser. The facility is proposing closed loop system that utilizes a refrigerated condenser. BACT requirements are met.

RULE 1303(b)(1) – MODELING
The unit emits only VOC which is exempt from modeling requirements.

RULE 1303(b)(2) – EMISSION OFFSETS
The potential to emit from this facility in AQMD's NSR system shows 0 tons a year. The emissions from the current machine using perchloroethylene are not considered a VOC. The offset threshold is 4 tons per year or 22 lbs per day. The emission increase from the use of the hydrocarbon solvent is less than 22 lbs per day therefore no offset are needed.

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PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

Pollutant	Facility Potential to Emit [lbs/ year]			Offset Threshold [lbs/day]	Offset Required? Yes/No
	Before Construction	From Equipment	Total (After Construction)		
VOC	0	0.8	0.8	22	No

REGULATION XIV

RULE 1401 – NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

As per the MSDS, the DF 2000 Fluid contains no toxic air contaminants listed in Rule 1401. (Amended March 4, 2005). Therefore this rule does not apply.

RULE 1401.1 – REQUIREMENTS FOR NEW AND RELOCATED FACILITIES NEAR SCHOOLS
Not applicable.

RECOMMENDATION

All applicable Rules and Regulations have been met. A permit to construct is recommended with the conditions shown on the sample permit pending completion public notice if required.

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PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

PERMIT CONDITIONS

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE 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 ONLY USE, AS A DRY CLEANING FLUID, PETROLEUM SOLVENT WITH AN INITIAL BOILING POINT OF NOT LESS THAN 375 DEGREES FAHRENHEIT.
4. THE TOTAL QUANTITY OF PETROLEUM SOLVENT THAT IS REPLENISHED IN THIS EQUIPMENT SHALL NOT EXCEED 10 GALLONS PER MONTH, AVERAGED OVER ANY 12-MONTH PERIOD.
5. EACH WORKING DAY, THE OPERATOR OF THIS EQUIPMENT SHALL INSPECT AND CLEAN WITH A WET CLOTH THE FOLLOWING COMPONENTS:
   A. GASKETS AND EDGES OF THE LOADING DOOR
   B. LOADING DOOR LINER
   C. LINT FILTER
   D. AIR FILTER
   E. WASTE WATER SEPARATOR

   IF ANY OF THE SEALS AND/OR GASKETS SHOW SIGNS OF WEAR (E.G. CUTS OR TEARS) SUCH THAT THEY CANNOT PROVIDE AN IMPERVIOUS SEAL AGAINST LIQUID, VAPOR OR AIR LEAKAGE FROM THE DRY CLEANING MACHINE, THE EQUIPMENT SHALL NOT BE OPERATED UNTIL THOSE SEALS AND/OR GASKETS ARE REPLACED.
6. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS OF RULE 1102, THE OPERATOR SHALL KEEP RECORDS OF SOLVENT USAGE, INSPECTIONS AND REPAIRS TO SHOW COMPLIANCE WITH CONDITION NO.4 AND 5. THESE RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT
7. ALL WASTE MATERIALS WHICH COME INTO CONTACT WITH ANY PETROLEUM SOLVENT SHALL BE STORED IN CLOSED CONTAINERS, AND DISPOSED OF IN ACCORDANCE WITH THE REQUIREMENTS OF THE DEPARTMENT OF HEALTH SERVICES.

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PERMIT SAMPLE EVALUATION
HYDROCARBON DRY CLEANING MACHINE
(Based on applicable Rules & Regulations as of September 2007)

8. PETROLEUM SOLVENTS USED IN THE EQUIPMENT SHALL NOT CONTAIN ANY CARCINOGENIC AIR CONTAMINANTS AS IDENTIFIED IN RULE 1401 AS AMENDED ON MARCH 4, 2005.

9. MATERIAL SAFETY DATA SHEETS FOR ALL DRY CLEANING SOLVENTS USED AT THIS FACILITY SHALL BE KEPT CURRENT AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

10. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE RETAINED AT THE FACILITY FOR AT LEAST TWO YEARS AND MADE AVAILABLE TO ANY DISTRICT PERSONNEL UPON REQUEST.

11. THIS EQUIPMENT SHALL COMPLY WITH RULE 1102.

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Appendix 2

Track Changes to March 2022 Draft SLA CERP

Table 5d-1: Actions to Reduce Emissions from and Exposure to General Industrial Facilities

Goal	Action	Responsible Entity(ies)	Matic(s)	Timeline	
				Start	Complete
C: Dry Cleaners	• ~~Enforcement of existing South Coast AQMD and CARB regulations (e.g., South Coast AQMD Rule 1102, South Coast AQMD Rule 1421, CARB Airborne Toxic Control Measure for Emissions of Perchloroethylene (Perc) from Dry Cleaning Operations (Dry Cleaning ATCM))~~ Set acceptable emissions from non-perc solvent-based dry clean systems regulated by Rule 1102 to zero based on viability of zero-emission alternatives.	South Coast AQMD CSC	• ~~Number of Rule 1102 and Rule 1421 inspections~~ Modify BACT (Best Available Control Technology) for non-perc solvent dry clean machines using professional wet cleaning, setting the acceptable VOC emissions at zero	3rd quarter 2022 ~~2023~~	4th quarter 2022
			• Amend Rule 1102 to eliminated Rule 102 Group II exemption [by striking (b) 13 and (h) II] and phase out non-perc dry clean machines after fifteen years for the date of installation	3rd quarter 2022	3rd quarter 2023
	• Phase out existing non-perc dry clean solvent machines after useful life and remove regulatory exemptions for non-perc dry clean solvent machines		• Provide list of incentive opportunities to support transition to ~~green alternatives~~professional wet cleaning, ~~if incentive opportunities are identified~~ (and other commercially viable zero-emission technology when identified)	3rd quarter 2022	2027 (note: assess need after 5 years)
	• ~~Identify~~ Create incentive opportunities to transition to ~~community-identified green alternatives~~professio		• Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102	4th quarter 2022	

4-6

	nal wet cleaning (and other commercially viable zero-emission technologies when identified) • Community outreach to owners and operators regarding regulatory changes, incentives for zero-emissions technologies, and demonstration workshops on ~~green alternative practices~~professional wet cleaning (and other commercially viable zero-emission technology when identified)		permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of new BACT classification for non-perc solvents machines • Notify all dry cleaners in SCAQMD – including cleaners with Rule 1102 permits as well as other non-perc dry cleaners not currently regulated by Rule 1102 of Rule 1102 rule change • Support creating professional wet cleaning demonstration program to jump start transition to zero emission professional apparel cleaning alternatives. • Number of outreach materials distributed to owners and operators be published on the website concerning new BACT, changes in Rule 1102, availability of incentives, and ongoing demo workshops on zero-emission technologies	3rd quarter 2023 3rd quarter 2022 3rd quarter 2022	2027 (Note assess need for demo program after five years) 2027 (Note assess need if demo program extended	4-6 cont.

[i] http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/overview.pdf
[ii] http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/overview.pdf
[iii] http://www.aqmd.gov/home/permits/bact/guidelines
[iv] http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/part-d---bact-guidelines-for-non-major-polluting-facilities.pdf
[v] http://www.aqmd.gov/docs/default-source/permitting/dryclean_template.pdf
[vi] Sinsheimer, P., Grout, C., Namkoong, A., Gottlieb, R., & Latif, A. (2007). The viability of professional wet cleaning as a pollution prevention alternative to perchloroethylene dry cleaning. *Journal of the Air & Waste Management Association*, *57*(2), 172-178; Onasch, J., Jacobs, M., & Biddle, E. (2017). From Perchloroethylene Dry Cleaning to Professional Wet Cleaning: Making the Health and Business Case for Reducing Toxics. *Journal of Environmental Health*, *79*(6).
[vii] For CO2 dry cleaning, capital cost of the CO2 system is estimated to be $60,000 greater than a petroleum/hydrocarbon system. This amounts to a total present value of $40,533 based on the assumptions provided in PART C of a 4% interest rate over the 10-year equipment life. Using the figure of 261 lbs/year of VOC emissions, total emissions over 10 years comes to 2,610 lbs or 1.3 tons. Cost per ton of VOC/ROG reduced for CO2 dry cleaning versus petroleum dry cleaning comes to $31,179 per ton of VOC/ROG reduced ($40,533/1.3 tons). For GreenEarth, capital costs are relatively comparable to petroleum dry cleaning. Assuming a $1 increase in net present value, the cost of ton of professional wet cleaning compared to petroleum dry cleaning comes to a cost of $0.77/ton ($1/1.3 tons) of VOC/ROG reduced. For professional wet cleaning, both capital costs and operating costs have been shown to be lower than for petroleum dry clean. Assuming a $20,000 decrease in net present value, $15,385 savings (-$20,000/1.3 tons) per ton of VOC/ROG reduced.
[viii] http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200320040AB998
[ix] California Air Resources Board. Alternative Solvents: Health and Environmental Impacts. (https://www.arb.ca.gov/toxics/dryclean/notice2015_alt_solvents.pdf) (September 4, 2015).
[x] 2018 6 20 European Chemical Agency. Inclusion of substances of very high concern in the Candidate List for eventual inclusion in Annex XIV (Decision of the European Chemicals Agency),
[xi] Note: While CO2 is classified as a greenhouse gas, CO2 dry clean machine manufacturers claim that the CO2 used in CO2 dry cleaning machines is captured from locations where the CO2 would otherwise be emitted to the atmosphere, such as from landfills or industrial production, and thus should not be considered as creating new CO2 emissions. That said, if capturing CO2 from landfills or industrial production can cost-effectively be sequestered, permanently eliminating these CO2, CO2 emissions from CO2 dry cleaning should be considered as creating an adverse environmental impact.

Response to Comment 4-1
See Response to Comment 3-2.

Response to Comment 4-2
See Response to Comment 3-3

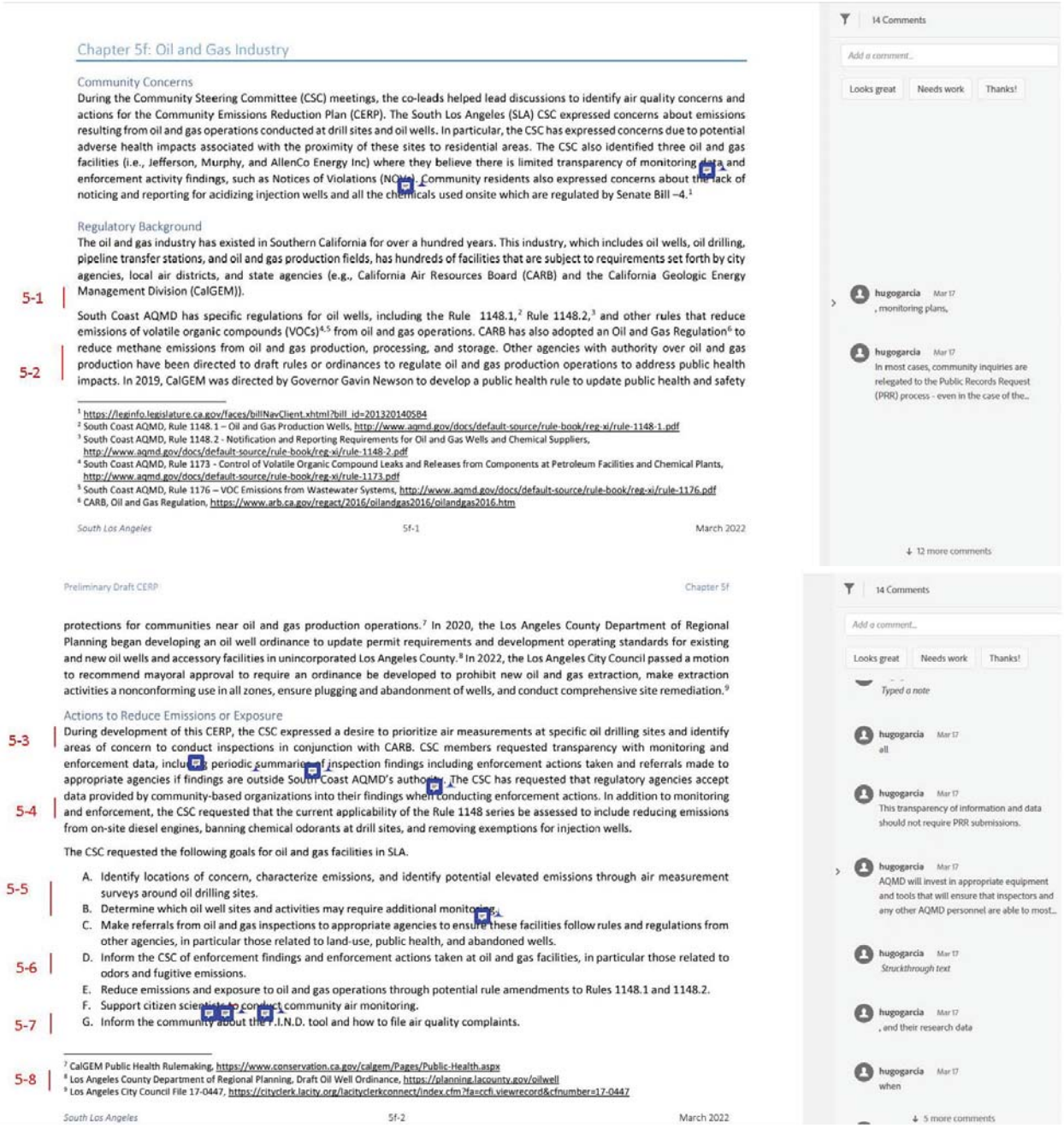
Response to Comment 4-3
Response to Comment 1-242i and 1-242j.

Response to Comment 4-4
South Coast AQMD is technology neutral and allows businesses to decide how they will comply with the requirements set forth in South Coast AQMD Rule 1102.

Response to Comment 4-5
See Response to Comments 1-232.

Response to Comment 4-6
See Response to Comments 1-242a through 1-242l.

Comment Letter #5 – Hugo Garcia (CSC Member, Esperanza Community Housing)



Chapter 5f: Oil and Gas Industry

Community Concerns

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) CSC expressed concerns about emissions resulting from oil and gas operations conducted at drill sites and oil wells. In particular, the CSC has expressed concerns due to potential adverse health impacts associated with the proximity of these sites to residential areas. The CSC also identified three oil and gas facilities (i.e., Jefferson, Murphy, and AllenCo Energy Inc) where they believe there is limited transparency of monitoring data and enforcement activity findings, such as Notices of Violations (NOVs). Community residents also expressed concerns about the lack of noticing and reporting for acidizing injection wells and all the chemicals used onsite which are regulated by Senate Bill –4.[1]

Regulatory Background

The oil and gas industry has existed in Southern California for over a hundred years. This industry, which includes oil wells, oil drilling, pipeline transfer stations, and oil and gas production fields, has hundreds of facilities that are subject to requirements set forth by city agencies, local air districts, and state agencies (e.g., California Air Resources Board (CARB) and the California Geologic Energy Management Division (CalGEM)).

5-1

South Coast AQMD has specific regulations for oil wells, including the Rule 1148.1,[2] Rule 1148.2,[3] and other rules that reduce emissions of volatile organic compounds (VOCs)[4,5] from oil and gas operations. CARB has also adopted an Oil and Gas Regulation[6] to reduce methane emissions from oil and gas production, processing, and storage. Other agencies with authority over oil and gas production have been directed to draft rules or ordinances to regulate oil and gas production operations to address public health impacts. In 2019, CalGEM was directed by Governor Gavin Newson to develop a public health rule to update public health and safety

5-2

[1] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB4
[2] South Coast AQMD, Rule 1148.1 – Oil and Gas Production Wells, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-1.pdf
[3] South Coast AQMD, Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf
[4] South Coast AQMD, Rule 1173 - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1173.pdf
[5] South Coast AQMD, Rule 1176 – VOC Emissions from Wastewater Systems, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1176.pdf
[6] CARB, Oil and Gas Regulation, https://www.arb.ca.gov/regact/2016/oilandgas2016/oilandgas2016.htm

protections for communities near oil and gas production operations.[7] In 2020, the Los Angeles County Department of Regional Planning began developing an oil well ordinance to update permit requirements and development operating standards for existing and new oil wells and accessory facilities in unincorporated Los Angeles County.[8] In 2022, the Los Angeles City Council passed a motion to recommend mayoral approval to require an ordinance be developed to prohibit new oil and gas extraction, make extraction activities a nonconforming use in all zones, ensure plugging and abandonment of wells, and conduct comprehensive site remediation.[9]

Actions to Reduce Emissions or Exposure

5-3

During development of this CERP, the CSC expressed a desire to prioritize air measurements at specific oil drilling sites and identify areas of concern to conduct inspections in conjunction with CARB. CSC members requested transparency with monitoring and enforcement data, including periodic summaries of inspection findings including enforcement actions taken and referrals made to appropriate agencies if findings are outside South Coast AQMD's authority. The CSC has requested that regulatory agencies accept data provided by community-based organizations into their findings when conducting enforcement actions. In addition to monitoring and enforcement, the CSC requested that the current applicability of the Rule 1148 series be assessed to include reducing emissions from on-site diesel engines, banning chemical odorants at drill sites, and removing exemptions for injection wells.

5-4

The CSC requested the following goals for oil and gas facilities in SLA.

5-5

A. Identify locations of concern, characterize emissions, and identify potential elevated emissions through air measurement surveys around oil drilling sites.
B. Determine which oil well sites and activities may require additional monitoring.
C. Make referrals from oil and gas inspections to appropriate agencies to ensure these facilities follow rules and regulations from other agencies, in particular those related to land-use, public health, and abandoned wells.

5-6

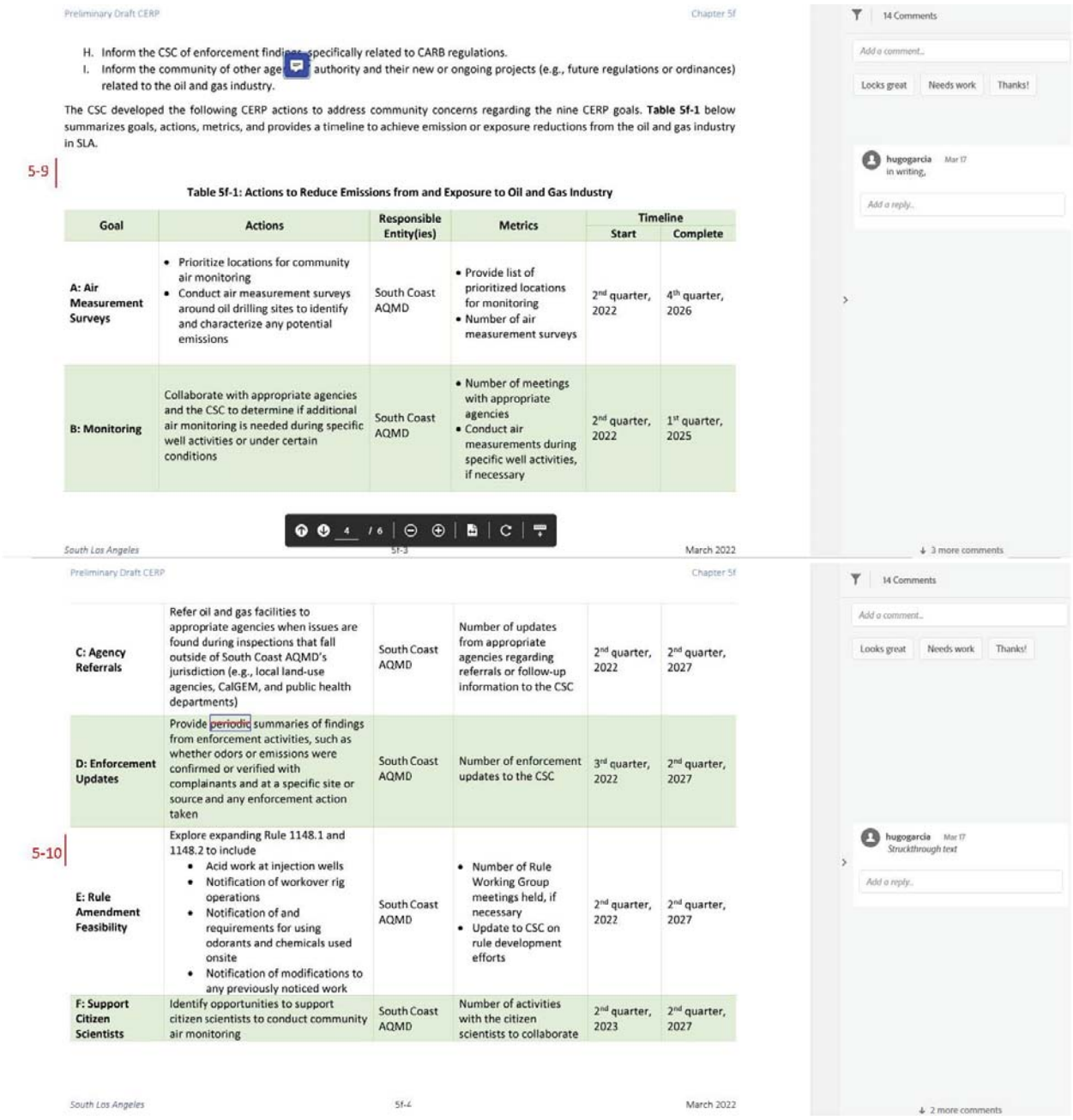
D. Inform the CSC of enforcement findings and enforcement actions taken at oil and gas facilities, in particular those related to odors and fugitive emissions.
E. Reduce emissions and exposure to oil and gas operations through potential rule amendments to Rules 1148.1 and 1148.2.
F. Support citizen scientists to conduct community air monitoring.

5-7

G. Inform the community about the F.I.N.D. tool and how to file air quality complaints.

[7] CalGEM Public Health Rulemaking, https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx
[8] Los Angeles County Department of Regional Planning, Draft Oil Well Ordinance, https://planning.lacounty.gov/oilwell
[9] Los Angeles City Council File 17-0447, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=17-0447

5-8



H. Inform the CSC of enforcement findings specifically related to CARB regulations.
I. Inform the community of other agency authority and their new or ongoing projects (e.g., future regulations or ordinances) related to the oil and gas industry.

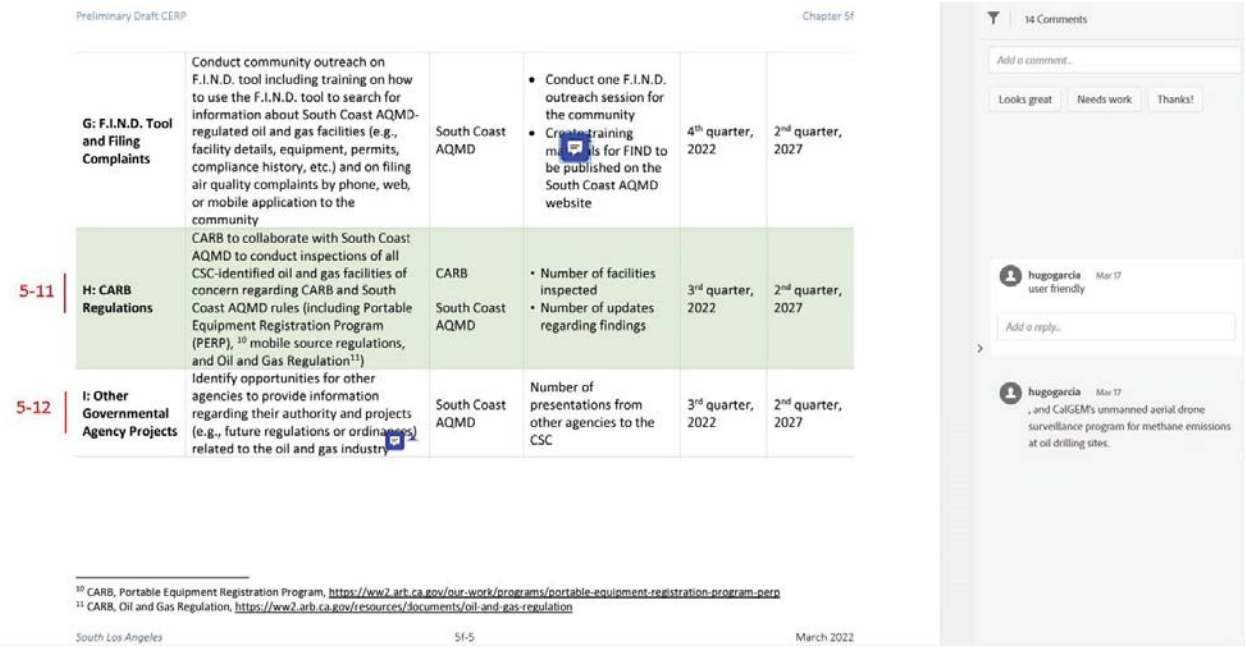
The CSC developed the following CERP actions to address community concerns regarding the nine CERP goals. **Table 5f-1** below summarizes goals, actions, metrics, and provides a timeline to achieve emission or exposure reductions from the oil and gas industry in SLA.

5-9

Table 5f-1: Actions to Reduce Emissions from and Exposure to Oil and Gas Industry

Goal	Actions	Responsible Entity(ies)	Metrics	Timeline	
				Start	Complete
A: Air Measurement Surveys	• Prioritize locations for community air monitoring • Conduct air measurement surveys around oil drilling sites to identify and characterize any potential emissions	South Coast AQMD	• Provide list of prioritized locations for monitoring • Number of air measurement surveys	2nd quarter, 2022	4th quarter, 2026
B: Monitoring	Collaborate with appropriate agencies and the CSC to determine if additional air monitoring is needed during specific well activities or under certain conditions	South Coast AQMD	• Number of meetings with appropriate agencies • Conduct air measurements during specific well activities, if necessary	2nd quarter, 2022	1st quarter, 2025
C: Agency Referrals	Refer oil and gas facilities to appropriate agencies when issues are found during inspections that fall outside of South Coast AQMD's jurisdiction (e.g., local land-use agencies, CalGEM, and public health departments)	South Coast AQMD	Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC	2nd quarter, 2022	2nd quarter, 2027
D: Enforcement Updates	Provide periodic summaries of findings from enforcement activities, such as whether odors or emissions were confirmed or verified with complainants and at a specific site or source and any enforcement action taken	South Coast AQMD	Number of enforcement updates to the CSC	3rd quarter, 2022	2nd quarter, 2027
E: Rule Amendment Feasibility	Explore expanding Rule 1148.1 and 1148.2 to include • Acid work at injection wells • Notification of workover rig operations • Notification of and requirements for using odorants and chemicals used onsite • Notification of modifications to any previously noticed work	South Coast AQMD	• Number of Rule Working Group meetings held, if necessary • Update to CSC on rule development efforts	2nd quarter, 2022	2nd quarter, 2027
F: Support Citizen Scientists	Identify opportunities to support citizen scientists to conduct community air monitoring	South Coast AQMD	Number of activities with the citizen scientists to collaborate	2nd quarter, 2023	2nd quarter, 2027

5-10



Preliminary Draft CERP Chapter 5f

	G: F.I.N.D. Tool and Filing Complaints	Conduct community outreach on F.I.N.D. tool including training on how to use the F.I.N.D. tool to search for information about South Coast AQMD-regulated oil and gas facilities (e.g., facility details, equipment, permits, compliance history, etc.) and on filing air quality complaints by phone, web, or mobile application to the community	South Coast AQMD	• Conduct one F.I.N.D. outreach session for the community • Create training materials for FIND to be published on the South Coast AQMD website	4th quarter, 2022	2nd quarter, 2027
5-11	H: CARB Regulations	CARB to collaborate with South Coast AQMD to conduct inspections of all CSC-identified oil and gas facilities of concern regarding CARB and South Coast AQMD rules (including Portable Equipment Registration Program (PERP),[10] mobile source regulations, and Oil and Gas Regulation[11])	CARB South Coast AQMD	• Number of facilities inspected • Number of updates regarding findings	3rd quarter, 2022	2nd quarter, 2027
5-12	I: Other Governmental Agency Projects	Identify opportunities for other agencies to provide information regarding their authority and projects (e.g., future regulations or ordinances) related to the oil and gas industry	South Coast AQMD	Number of presentations from other agencies to the CSC	3rd quarter, 2022	2nd quarter, 2027

[10] CARB, Portable Equipment Registration Program, https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
[11] CARB, Oil and Gas Regulation, https://ww2.arb.ca.gov/resources/documents/oil-and-gas-regulation

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Response to Comment 5-1

The proposed addition of "monitoring plan" is not included as South Coast AQMD does not require monitoring plans from oil and gas facilities. However, air monitoring will be conducted at all 19 oil and gas facilities in SLA as detailed in the CAMP.

Response to Comment 5-2

Language regarding the concern of Public Records Requests not being considered transparent is added to Chapter 5f: Oil and Gas Industry, in section "Community Concerns". Please also see Response to Comment 1-271 for information on Public Records Request.

Response to Comment 5-3

The proposed additional of "all" to inspection findings is not included as there may be information South Coast AQMD cannot release to the public due to ongoing investigations or confidential information.

Response to Comment 5-4

See Response to Comment 1-271.

Response to Comment 5-5

South Coast AQMD has access to a variety of equipment necessary to conduct investigations, including toxic vapor analyzers (TVA) for volatile organic compound (VOC) leak detection, Jerome meters for quantifying hydrogen sulfide (H2S), and optical gas imaging cameras (OGI) for identifying fugitive VOC emissions. For the purposes of oil and gas facilities, South Coast AQMD will assess if there is any specific equipment lacking and consider acquiring it to provide for inspectors to use at inspections.

Response to Comment 5-6 through 5-8

In Chapter 5f, section "Actions to Reduce Emissions or Exposure", the language is revised from "to conduct" to "with conducting." The revision also includes "understanding data" rather than "analyzing data" since South Coast AQMD will work with the community scientists to understand the data resulting from the community air monitoring conducted.

Response to Comment 5-9

The proposed addition of "in writing" is not included in this goal in Chapter 5f. The CSC will be informed of enforcement findings periodically through presentations to the CSC. In Chapter 5f, Goal D currently commits South Coast AQMD to providing enforcement updates to the CSC; therefore, a formal report will not be provided. Also see Response to Comment 1-266.

Response to Comment 5-10

The proposed deletion of "periodic" is not included in this goal. The CSC will be informed of enforcement findings periodically through presentations to the CSC.

Response to Comment 5-11

Goal G has been removed from Chapter 5f and will be implemented through Chapter 5d, Goal E: F.I.N.D. Tool and Filing Complaints. Therefore, the proposed addition of "user-friendly" is included in Chapter 5d, Goal E in the Final CERP. Currently, detailed help materials and video tutorials are being built to make the online F.I.N.D. tool more accessible and user-friendly, and to highlight existing features such as searching for facilities by industry type and AB 617 community.

Response to Comment 5-12

CalGEM drone surveillance, is included as an example of projects in Chapter 5f, Goal H: Other Governmental Agency Projects as a program for which other governmental agencies may provide information.

Comment Letter #6 – Elizabeth Kamai (City of Los Angeles Resident)

SCAQMD Banner

Community Emission Reduction Plan (CERP) Comment Form

Language Preference
(•) English ( ) Español

AB617 Community
South Los Angeles

Enter your contact information, comments and/or upload comment files below. Please note that information provided by you on this form (including contact or other personal information) is a public record and may be released in response to a California Public Records Act request.
*Fields Required to Submit a Comment

Form Informtion

Date Created	Time Created
03/17/2022	10:01 PM

Commentor Contact Information

Commenter's Name	Affiliation
ELIZABETH KAMAI	Agency, School, University or Hospital

Comments (Unlimted Size)

My name is Elizabeth Kamai. I am a Los Angeles resident (just a couple of blocks west of the South LA Community Boundary), environmental epidemiologist, and Postdoctoral Research Associate in the Division of Environmental Health at the Keck School of Medicine at the University of Southern California.

I have three primary areas of concern.

First is the assessment of baseline emissions in Chapter 3B:

It is unclear whether this emissions inventory included any measurements of air pollutants, or if it relies entirely on model estimates and self-reported data from large industries. 6-1

What does it mean that "it includes an emphasis on identifying sources within the community"? (page 3b-1). 6-2

Visualization of this chapter would be beneficial.
Page 3b-2: "There are areas within SLA community with significantly higher air toxics cancer risks compared to the average of the Basin." A map of air toxics measures or estimates and of air toxics cancer risks in SLA would clarify this statement. 6-3

Page 3b-2: "The community also includes a wide range of industrial facilities, including those that conduct metal processing, surface coatings, auto body shops, and warehousing that attracts heavy-duty truck traffic." Where are these industrial facilities located? What proportion of these facilities report emissions estimates to the AER? 6-4

Page 3b-2: "In this community, onroad mobile sources are the largest emitters of NOx, with heavy-duty trucks being the largest contributor." Clarify how this was determined. 6-5

Again, a map and additional graphics would be helpful in this section. Where are the mobile, area, and point sources of emissions concentrated, per this emissions assessment? Do the "hot spots" identified by this emissions attribution assessment align with the lived experience of community members? 6-6

What does "solvent evaporation" mean and where is it occurring? Are there specific industries or locations that produce this source of VOCs? 6-7

Where do emissions from oil and gas operations fit in to this assessment? 6-8

"[T]he chemical and plastics industry" is mentioned several times, but it is unclear what this entails. Where are these facilities? Do they report to AER? 6-9

The Annual Emissions Reporting program is an extremely limited assessment of air toxics emissions in SLA. The limitations of these data - that they are self-reported by facilities, do not include measurements, and reflect only about a dozen facilities in the entire SLA community -need to be emphasized, and the vast missingness of air toxics data needs to be evaluated and estimated to include in this baseline emissions estimate. It is misleading to write that "all" sources are included in this emissions assessment (e.g., in the title of Figure 3b-7) because the AER includes only a handful of the largest facilities in SLA. Only a couple of the more than 40 electroplating facilities in SLA (potential sources of hexavalent chromium) are required to report to the AER. None of the metal recycling facilities (potential sources of lead, arsenic, mercury, and other toxics) report to the AER. None of the autobody shops report to the AER. 6-10

Finally, this chapter in general is difficult to read. Consider re-organizing it in a more narrative style. 6-11

My second concern is the emissions estimates presented in Chapter 5a. Where are the other air toxics emissions? How will they be reduced by the CERP? 6-12

My final main concern is the lack of emissions reductions activities Chapter 5 of this emissions reduction plan.

None of the metrics include estimates, let alone measures, of associated emissions and how the actions would result in emissions reductions. Emissions estimates are necessary to evaluate whether this emissions reduction plan actually results in emissions reductions.

It would be helpful, as community members have suggested, to include an indicator of what level within the Hierarchy of Controls at which each emissions reduction "action" belongs. 6-13

Community air pollution exposure is intricately linked to workers' occupational air pollution exposure. I would like to see collaboration with OSHA or other workplace safety organizations to work to implement emissions reductions best practices in tandem with occupational safety best practices. 6-14

Chapter 5b: Mobile Sources
Explain how each metric relates to emissions reductions. Ex: How does the number of outreach events in the community result in emissions reductions and of which pollutants? 6-15

Goal B is listed as, "Reduce students' exposure to air pollution, especially mobile source emissions at schools." However in Table 5b-1, it has been changed to "School Air Filtration." These are different goals. Installing air filters in schools will reduce children's exposure to air pollution in their classrooms, but not at recess, not a lunch, not between classes, not before school, not after school, not walking to school, not participating in after school activities. Rather, to meaningfully reduce children's exposure to air pollution from mobile source emissions at schools, trucks should be routed away from schools, trucks and cars should be electrified (which would also require supporting installing electric vehicle charging stations throughout the community), idling sweeps should be conducted near schools, and no idling zones must be enforced. 6-16

Chapter 5c: Auto Body Shops
Explain how each metric relates to emissions reductions. Ex: How does the Number of updates from appropriate agencies regarding referrals or follow-up information to the CSC result in emissions reductions and of which pollutants? 6-17

Chapter 5d: General Industrial Facilities
Explain how each metric relates to emissions reductions. Ex: How does providing emissions data for identified facilities result in emissions reductions and of which pollutants? 6-18

How will facilities be prioritized? Will air pollution measures be taken at these facilities?

Consider broadening the requirements of AER to include smaller facilities. Additionally, consider using cumulative impact assessments in permitting and regulating existing facilities so that clusters of many small, relatively low emissions facilities do not result in hot spots of highly toxic air pollution. 6-19

The F.I.N.D. tool is not user friendly and difficult to use. Rather than encouraging and teaching community members to use this tool, consider investing in creating better tools. Link to other agencies' data and maps, enable creation of your own maps and easy downloading of data, and proactively improve the tool to fit community members' needs. 6-20

Chapter 5e: Metal Processing Facilities
Explain how each metric relates to emissions reductions. Ex: How does conducting a workshop result in emissions reductions and of which pollutants? 6-21

Consider broadening the requirements of AER to include smaller facilities. Additionally, consider using cumulative impact assessments in permitting and regulating existing facilities so that clusters of many small, relatively low emissions facilities do not result in hot spots of highly toxic air pollution. 6-22

Chapter 5f: Oil and Gas Industry
Explain how each metric relates to emissions reductions. Ex: How does the number of working group meetings result in emissions reductions and of which pollutants? 6-23

Change "explore expanding Rule 1148.a and 1148.2" to "enforce Rule 1148.a and 1148.2 to the fullest extent of the law" 6-24

Overall, this report lacks a clear connection between the emissions estimated in Chapter 3 and the proposed reduction activities in Chapter 5. It would be helpful to include maps of current air pollution hot spots and sources and point to where and how each action in the CERP will result in reductions in air pollution. 6-25

Upload Additional Comment and Supporting Files (30 Mb Maximum per file)

CERP Comment Files

Note: Supported upload files include all versions of Microsoft Office, jpeg, tiff, PDF, mp3, mp4, and text files.
For More Information Contact: ab617@aqmd.gov

Response to Comment 6-1
See Response to Comments 1-86 and 1-93.

Response to Comment 6-2
The language is revised in Chapter 2d, section "Introduction" for clarification.

Response to Comment 6-3
Maps are added to Chapter 2d: Emissions and Source Attribution; see Response to Comment 1-89 for explanation of maps and Response to Comment 1-91 for additional information on MATES.

Response to Comment 6-4
See Response to Comments 1-90, and 1-93 for information regarding Annual Emissions Reporting (AER) and additional maps added. Additional maps of the locations of permitted auto body shops, metal processing facilities, and oil and gas facilities are included in Chapter 5c: Auto Body Shops (see Figure 5c-1 "Permitted Auto Body Shops in SLA") and Appendix 5c: Auto Body Shops (see Figure A5c-1 "Map of Facilities Applicable to the Auto Body Shop Air Quality Priority"), Chapter 5e: Metal Processing Facilities (see Figure 5e-1 "Metal Processing Facilities in SLA"), and Chapter 5f: Oil and Gas Industry (see Figure 5f-1 "Oil and Gas Facilities in SLA") and Appendix 5f: Oil and Gas Industry (see Figure A5f-1 "Map of Oil and Gas Facilities with Active South Coast AQMD Permits in SLA"), respectively. The air quality priority facilities maps will also be added to the interactive online SLA Story Map and will be available after CERP adoption.

Response to Comment 6-5
An explanation of the methodology used for on-road emissions is in Chapter 2d, section "On-Road Sources."

Response to Comment 6-6
See Response to Comment 1-90 for information on the maps added to Chapter 2d: Geographic Distribution Maps, Stationary and Areawide Maps, and On-Road and Off-Road Maps.

Response to Comment 6-7
Solvent evaporation refers to the emissions from household and commercial products that typically include volatile organic compounds (VOCs). These products include cleaning and disinfecting agents, body care and cosmetics, paint and adhesives, products for automotive care, and paint, primers, coatings, and sealers used for architectural coatings. These emissions are not from industries manufacturing the products, but rather from the use of the products by consumers. This clarification is included as a footnote in subsection "Reactive Organic Gas Sources in South Los Angeles" of Chapter 2d.

Response to Comment 6-8
Emissions from oil and gas operations are included as part of the "petroleum production and marketing" and "oil and gas extraction" categories.

Response to Comment 6-9

The chemical and plastics industry refers to emissions from plastics production in the chemical industry and most of the emissions are from aggregated small industrial sources. See Response to Comment 1-86 for discussion on aggregated sources for facilities that do not report to AER. Figure 2d-5 "Examples of Geographic Distribution of Small Facilities in Various Industrial Sectors in SLA", in Chapter 2d, section "Facilities (Stationary Sources)", is added to illustrate the geographic distribution of small facilities for the following industrial sectors in the SLA community: metal parts (processing), plastic production, auto body shops, and general industrial facilities.

Response to Comment 6-10

See Response to Comments 1-86 and 1-93 for explanation on emissions methodology. Additional information regarding AER may be found in section "Annual Emissions Reporting" of Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts.

Response to Comment 6-11

Since the source attribution report is a technical analysis, the current style is retained; however, additional language, figures, and images are added throughout Chapter 2d for clarification and readability.

Response to Comment 6-12

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution, includes CARB's emission reduction targets from statewide measures. TAC emissions are described in Chapter 2d in subsection "Toxic Air Contaminant (TAC) Emissions". TAC emissions specific to each air quality priority are described in further detail in each of the respective air quality appendices (Appendices 5b through 5f) under the section "Emissions from [air quality priority]." For example, PERC emissions from dry cleaners are discussed in Appendix 5d: General Industrial Facilities under the section "Emissions from General Industrial Facilities".

Actions written in each of the Chapter 5 subchapters will result in emission and/or exposure reductions from the air quality priority sources; CERP actions include the following strategies: rules and regulations, incentives, outreach, enforcement, and monitoring. These strategies will result in emission reductions; however, they cannot be quantified at this time. As an example, Goal G: Rule Amendments in Chapter 5c commits to amendments of South Coast AQMD Rules 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations and 1171 – Solvent Cleaning Operations. The rule amendment process entails working with stakeholders to identify the affected facilities and/or equipment and establish more stringent requirements, where feasible. Emission reductions for these rules will be quantified during the rule development process based on the provisions of the proposed rule or amendment.

Outreach events within the community and distribution of outreach materials provides information on source regulations, best practices, ways to file a complaint, and incentive programs, which can result in emissions reductions as they provide information to the

community and businesses on how to reduce emissions. Each outreach event held in the community does not have a defined emission reduction target. An outreach example that can achieve emissions reductions includes providing information to truck owners or operators in the community regarding idling rules and regulations. As truck owners and operators implement these rules and regulations, less idling will occur which leads to less emissions and exposure (e.g., not idling near a school). Another example is providing information on how to file a complaint. This empowers the community to report idling trucks which helps CARB and South Coast AQMD identify areas where to conduct more focused enforcement efforts (e.g., inspections). Through inspections, enforcement actions (e.g., NOVs); thus, reducing emissions from non-compliance. Please note, emissions cannot be quantified or estimated, because the number of trucks or types of trucks are unknown at this time that will be inspected.

An additional outreach example includes providing information on incentive programs to truck owners and operators for opportunities to change out their older, higher polluting trucks to newer, cleaner technology. At an outreach event, an independent truck owner can learn about the incentive programs, then apply and qualify for funds to replace their truck. Incentives provide funding to replace older, higher polluting equipment with newer, cleaner equipment (e.g., heavy-duty trucks). Funding allows for sources to install emission reduction technologies which otherwise may not be installed and allows sources to replace older equipment which accelerates replacement, both leading to emissions and/or exposure reductions. The emissions can be quantified once an application is received identifying the older, higher polluting truck that will be replaced and the replacement has occurred. It is anticipated that through outreach events, information distributed about the incentive programs will result in an increase in applications for truck replacements, resulting in more emissions reductions in the SLA community. These efforts will largely reduce NOx (criteria pollutant) and DPM (air toxic).

Once all CERP mobile source incentive projects are implemented and assuming a minimum of ten million dollars invested for mobile source measures, the estimated emissions reductions benefits from implementing any future recommended awards is 40 tons per year (tpy) of NOx and 0.02 tpy of DPM.

Another example is through monitoring efforts, an area of concern can be identified, resulting in a focused enforcement effort to identify a facility that may be out of compliance. Enforcement reduces emissions from finding sources of non-compliance and reducing emissions from those sources. Thus, bringing this facility into compliance will result in emission reductions.

Metrics are not associated with direct quantifiable emission reduction targets; however, they provide ways to track implementation of the CERP actions to ensure emissions reductions are achieved. South Coast AQMD will provide updates to the CSC on emission reductions achieved during CERP implementation.

Response to Comment 6-13

A discussion, as presented by the community co-leads, on the Hierarchy of Controls is included in Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads in subsection "Hierarchy of Controls." National Institute for Occupational Safety and Health's (NIOSH's) Hierarchy of Controls, which can be found here: https://www.cdc.gov/niosh/topics/hierarchy/default.html, addresses occupational hazards and is intended to protect workers health and safety with a focus on overall occupational safety. NIOSH is a research agency focused on the study of worker safety and health, and empowering employers and workers to create safe and healthy workplaces. Therefore, NIOSH's Hierarchy of Controls is not directly correlated to or appropriate for actions to reduce emissions from and/or exposure to air pollutants. More information on NIOSH can be found here: https://www.cdc.gov/niosh/index.htm. South Coast AQMD can impose air pollution requirements on sources of pollution (e.g., elimination, substitution, restrictions, emissions limits), but lacks the authority to require facilities to adopt specific practices for their workers (e.g., administrative controls, personal protective equipment (PPE), engineering controls). South Coast AQMD evaluates air pollution controls for emission and/or exposure reductions through the rule development process, permitting program, and rule requirements, (e.g., Rule 1401, health risk assessments (HRAs), and Best Available Control Technology).

Response to Comment 6-14

As outlined in the CERP actions, South Coast AQMD and CARB will collaborate with other responsible agencies to address the concerns raised by the CSC. For example, Goal C: Agency Collaboration and Referrals in Chapter 5c includes a commitment to collaborate with the appropriate agency to refer any potential issue found during auto body shop inspection sweeps, such as Cal/OSHA. Worker safety and health is under the authority of OSHA and Cal/OSHA. South Coast AQMD does not have authority on worker exposure, but through rules and regulations and permitting to limit off-site (residential and commercial) exposure of TACs from a facility. For example, South Coast AQMD Rules 1401 and 1402, require HRAs. More information on HRAs can be found here: http://www.aqmd.gov/home/permits/risk-assessment.

Response to Comment 6-15

See Response to Comment 6-12 for emission reductions from CERP actions and metrics.

Response to Comment 6-16

See Response to Comment 1-200, "Additional Exposure Reduction at Schools" regarding reducing exposure for children when they are outside of the classroom, including idling inspection sweeps, providing incentives to replace older, higher polluting trucks with newer, cleaner technology earlier than required by existing regulations and replace diesel school buses with zero-emission and near-zero emission alternative fuel buses, and No Idling zones. During CERP implementation, the CSC can prioritize locations near schools for idling sweeps and installation of "No Idling" signs to further reduce students' exposure.

See Response to Comment 1-205 regarding truck routes.

See Response to Comment 1-208c regarding electric vehicles and infrastructure.

Response to Comment 6-17

See Response to Comment 6-12 regarding emissions reductions from CERP actions and metrics. Specifically, the number of updates regarding collaborations and referrals or follow-up information will help address the CSC's specific concerns that are outside of South Coast AQMD's authority. Although the South Coast AQMD lacks authority, South Coast AQMD and CARB are committed to working collaboratively with other agencies to address the CSC's air quality priorities. As an example, during an auto body shop inspection, South Coast AQMD inspectors may notify OSHA about issues (e.g., lack of PPE) at a facility; a resulting action taken by OSHA regarding this facility could result in reducing worker exposure to air pollutants.

Emissions related to auto body shops can be found in Appendix 5c. The CERP actions will result in emission reductions, but cannot be quantified at this time. South Coast AQMD will update the CSC on emission reductions achieved.

Response to Comment 6-18

See Response to Comment 6-12 regarding emissions reductions from CERP actions and metrics. CSC members requested information on general industrial facilities in this community, and processes conducted, compliance history, and the emissions resulting from these facilities. Thus, Goal A: Identify Facilities of Concern was included in Chapter 5d: General Industrial Facilities.

CSC members will identify and prioritize general industrial facilities of concern in this community. Based on the CSC-prioritized list of facilities, South Coast AQMD will provide the CSC a list of applicable South Coast AQMD rules and the compliance history and emissions data of these CSC-identified facilities. In Chapter 5d, Information resulting from Goal A will be used to develop emission and exposure measures in Goal B: Identify Strategies for these facilities.

This action does not directly lead to emission reductions; however, it needs to be completed before Action B can begin implementation, which will guide the development of emission and exposure reduction measures. For example, the emissions data may help the CSC prioritize which pollutants, locations, and types of general industrial facilities to focus on. Based on the data the CSC may prioritize different strategies, depending on the air pollutant emissions, such as focusing on enforcement efforts instead of rule development, since rule development may take longer for implementation. Emissions related to general industrial facilities can be found in Appendix 5d. The CERP actions will result in emission reductions, but cannot be quantified at this time. South Coast AQMD will update the CSC on emission reductions achieved.

Response to Comment 6-19

South Coast AQMD Rule 301 – Permitting and Associated Fees (http://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-301.pdf) was amended in 2019 to require CARB Criteria Pollutant and Toxics Emissions Reporting (CTR) facilities to report emissions to South Coast AQMD through the AER Program. CARB's CTR requires additional facilities to report emissions over the next six years and the majority of these facilities will be

smaller facilities. Facilities are phased-in based on industry sector and general industrial classifications (NAICS and Standard Industrial Classification (SIC) codes). Once the data is reported and complied, it will be reported in South Coast AQMD's online F.I.N.D. tool.

CEQA is a law that requires proposed projects to undergo an analysis of direct, indirect, and cumulative impacts. One of the requirements to be issued a permit is to comply with CEQA. Additional guidance is currently being developed for public agencies to evaluate cumulative air quality impacts from increased emissions of toxic air contaminants. The first working group meeting was held in February 2022 and the presentation, along with future documents and working group presentations, can be accessed at: http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).

Response to Comment 6-20

See Response to Comment 1-240. South Coast AQMD cannot commit other agencies to provide the requested data, nor can South Coast AQMD speak to whether the requested data exists.

Response to Comment 6-21

See Response to Comment 6-12 regarding emissions reductions from CERP actions and metrics. Emissions related to metal processing facilities can be found in Appendix 5e: Metal Processing Facilities. The CERP actions will result in emission reductions, but cannot be quantified at this time. South Coast AQMD will update the CSC on emission reductions achieved.

Conducting a workshop on CARB's CTR Workshop will not result in emissions reductions. However, the emissions inventory data from CTR will help to understand the health risks or other impacts at the local, regional, and statewide level. In addition, throughout CERP development, the CSC requested South Coast AQMD share additional data; a portion of the CTR workshop is to share data that has been collected from facilities in the community.

Response to Comment 6-22

Please see Response to Comment 6-19.

Response to Comment 6-23

See Response to Comment 6-12 regarding emissions reductions from CERP actions and metrics. The number of working group meetings does not directly lead to emission reductions; however, working group meetings are part of the rule development process. South Coast AQMD rules can be amended to require more stringent emission limits which would result in emission reductions. As part of the rule development process, emission reductions will be quantified where feasible. Emission reductions cannot be estimated until emission standards, compliance schedule, implementation approach, and any other assumption that is needed to estimate emissions is determined. All of this is developed during the rule development process with stakeholder input. As a result, the emission reductions cannot be determined at this time.

Emissions related to the oil and gas industry can be found in Appendix 5f. The CERP actions will result in emission reductions, but cannot be quantified at this time. South Coast AQMD will update the CSC on emission reductions achieved.

Response to Comment 6-24

The language for this action is changed in Chapter 5f from "Explore expanding Rule 1148.1 and 1148.2 to include" to "Initiate rule development process to amend the Rule 1148 Series to consider including...". Also, language is added to include additional items to be considered during rule amendment (e.g., additional notifications, improved leak detection and repair (LDAR), lower-emission or zero-emission equipment for on-site operations).

South Coast AQMD is under legal obligation to enforce air pollution regulations and rules, including South Coast AQMD Rules 1148.1 and 1148.2. If a facility is found to be out of compliance with South Coast AQMD rules or regulations or permit conditions, inspectors will take necessary enforcement action to address the non-compliant activity. Additional details on South Coast AQMD enforcement actions can be found in Appendix 4: Enforcement Overview and History.

Response to Comment 6-25

Additional information, including images, describing sources of criteria air pollutants (see section "Criteria Air Pollutants") and examples of sources (see section "Pollution Sources") in SLA are added to Chapter 2d. Chapter 2d Additionally, the subchapters of Chapter 5 include actions to address specific emissions sources. See Response to Comment 6-12 regarding emissions reductions from CERP actions and metrics. For many of these actions, emission reductions cannot be quantified until the action is completed. For each air quality priority, emission and exposure reductions will be focused on CSC-identified areas of concern.

Comment Letter #7 – Tim Strelitz (CSC Member, California Metal-X)

From: Tim F. Strelitz
To: Bernard Tolliver
Cc: Uyen-Uyen Vo; Nicole Silva; Paul Rodriguez; Ricardo Rivera; Belinda Huy
Subject: Re: South LA CSC Draft CERP
Date: Friday, April 1, 2022 5:56:27 AM

Good morning Bernard,

As everyone knows, I support AB 617. Being a responsible industrial manufacturer is not an option, it is a given.

I take exception to the AQMD mentioning any company as an example of who needs to be shut down without providing appropriate examples of their actions.

7-1

I agree that no manufacturer should build next to sensitive facilities but Atlas is unique. Thus far Atlas has not been cited for any environmental issues. Naming them is predatory given the facts.

Everyone has a stake and should have a voice at the table. Decisions by the State or the community should be science based.

Sincerely,

Tim Strelitz

Sent from my iPad

Response to Comment 7-1

CARB's Blueprint states that "the community steering committee will include community members who live, work, or own businesses within communities designated for focused action through community emissions reduction programs and community air monitoring." South Coast AQMD is committed to working with the community steering committee (CSC) to address the air quality priorities and develop the Community Emission Reduction Plan (CERP) and appreciates the support for the AB 617 program through this collaborative process. The CARB Blueprint can be found here: https://ww2.arb.ca.gov/sites/default/files/2020-10/Blueprint_Complete_Oct2018.pdf.

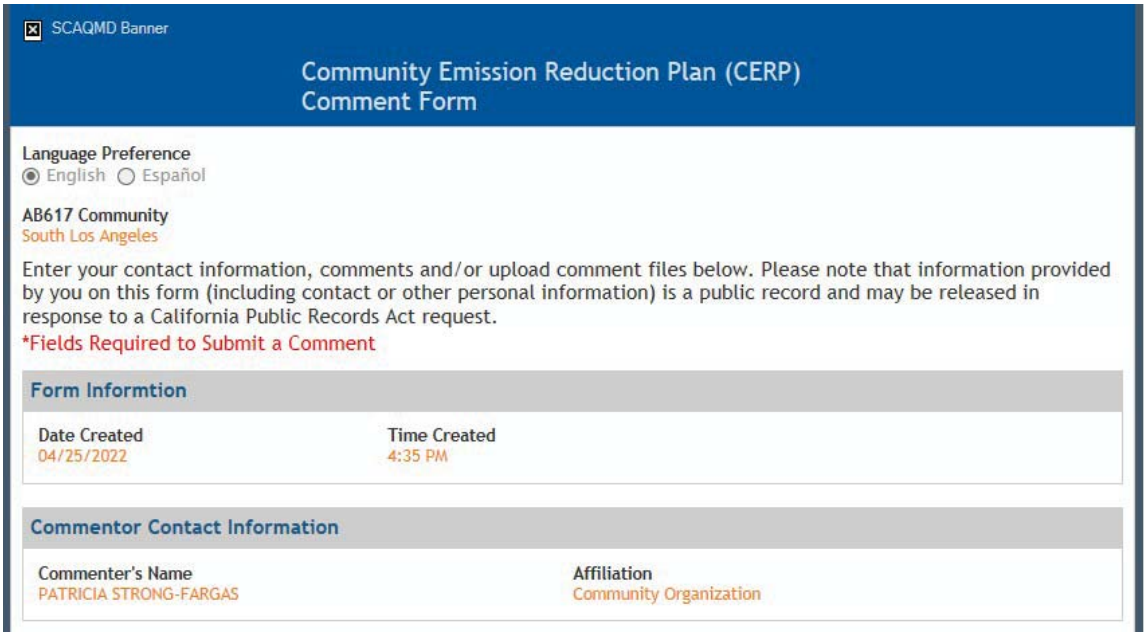
The CSC identified air quality priorities through the CERP development process, including metal processing facilities. During CERP development, the CSC mentioned different facilities of concern for some of the air quality priorities. These are listed merely as examples within the Chapter 5 subchapters in section "Community Concerns" to capture the CSC voice. The listing of a facility name does not necessitate that the facility should be shut down nor has or has not been cited by the South Coast AQMD for any violations.

Additionally, an interactive online SLA Story Map will be available after CERP adoption and identify permitted facilities for certain air quality priorities. A list of permitted facilities can be found in Appendix 4: Enforcement Overview and History and Chapter 5f, section "Community Concerns" (see Figure 5f-1 "Oil and Gas Facilities in SLA" lists the oil and gas facilities). Furthermore, specific facilities of concern were mentioned in CERPs for the Year 1 and Year 2 communities (e.g., Appendix 5 of the Southeast Los Angeles CERP (December 2020), which can be found here: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf). Therefore, the reference to Atlas Iron & Metal Co. is retained as part of section "Community Concerns" in Chapter 5e: Metal Processing Facilities.

The decision to shutdown a facility requires consideration of a number of issues, and the South Coast AQMD does not take this responsibility lightly. Emissions and monitoring data are critical to this decision, as well as the magnitude and duration of the excess emissions. Generally when the South Coast AQMD identifies a facility, staff meets with the operator to encourage implementation of measures to reduce excess emissions and impacts to the community.

Additionally, South Coast AQMD is specifically prohibited by state law from making land use decisions and does not have land use authority. These decisions are generally made by city or county planning agencies. Thus, South Coast AQMD lacks the authority to regulate the physical development of land, type of uses on these lands, such as zoning (e.g., residential, commercial, industrial), and the proximity of areas zoned within each other (e.g., siting residences near industrial facilities).

Comment Letter #8 – Patricia Strong-Fargas (CSC Member, Active Resident)



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Community Emission Reduction Plan (CERP)
Comment Form

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AB617 Community
South Los Angeles

Enter your contact information, comments and/or upload comment files below. Please note that information provided by you on this form (including contact or other personal information) is a public record and may be released in response to a California Public Records Act request.
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Form Informtion

Date Created	Time Created
04/25/2022	4:35 PM

Commentor Contact Information

Commenter's Name	Affiliation
PATRICIA STRONG-FARGAS	Community Organization

Comments (Unlimted Size)
CERP comments & questions
from Patricia Strong-Fargas

Chapter 1 - page 1-2. Comment on challenges the CSC faces with AB 617 communities emissions reduction program development timeline; one year to develop and adopt an emissions reduction program limits the ability to build community trust, inform the community, and build consensus. Another challenge is the limited authority of air districts to sufficiently address all air quality related issues raised by the CSCs. Limited funding has also been challenging to sufficiently support the development, implementation, and deployment of community plans. (Comments;The CSC should address with other city and state officials the importance of this CERP plan to gain support & funding. More we introduce & address the community to this plan, start implementation of this plan through enforcement and complete transparency we will build trust in the community). 8-1

Chapter 2 Public Process. (Questions & Comments: After the CERP plan has been implemented, how often will the CSC receive updates on the plan progress? What method do we use to inform the community? What parties are committed to building and improving existing outreach efforts as stated in Chapter 2 page 9?) 8-2

Chapter 3B Emissions and Source: (Chapter 3B, page 2: How are we going to measure the air toxics around the freeways of I10,I110, I105? 8-3
Considering the new construction around South Los Angeles; How do we keep up with the emissions of new construction? Do we just depend on community complaints? Can we connect with Department of Building & Safety on new projects?) 8-4

Chapter 3B: Don't forget to monitor auto body shops not in brick and mortar locations. 8-5

Chapter 3B - page 6: (Have we located Plastic Production companies in South Los Angeles, as stated on page 6? 8-6 What about recycling companies do they produce lot of toxics? 8-7

Chapter 3B - page 8: Can you explain this statement? Unlike NOx and VOC emissions, PM2.5 emissions remain virtually unchanged during the period from 2019 to 2031, reflecting that growth in population and economic activities offsets the reductions in on-road and off-road mobile sources due to regulations. 8-8

Chapter 3B - page 10: (Please explain this statement: While emissions of toxic air contaminants from mobile sources is expected to decrease over time, emissions from stationary sources in large facilities can still affect the nearby population, if these emissions are not remediated). 8-9

Chapter 3B - page 12: (Not only notify truck companies but also investors of the new constriction of our monitoring plan, rules & regulations). Also enforcement plan. 8-10

Chapter 3B - page 12 - Passenger vehicles and off-road equipment such as lawn mowers and other small gasoline engines, are the largest contributors to VOC emissions from on-road and off-road sources, respectively. (Comments: continue to educate the community on new methods or equipment to reduce toxics. Make new provisions to offer equipment that will reduce emissions). 8-11

Chapter 3B - page 12 - PM2.5 emissions span through a wide variety of activity sectors, which include commercial cooking, light- and medium-duty automobiles, fuel combustion, paved road dust, and wood and paper industries. (Comment: This is strictly educated individuals on this toxic information). 8-12

Chapter 3B - page 12 - Hexavalent Chromium, which is mostly emitted from metal processing facilities are identified to have the fifth highest contribution to the community's total cancer-potency weighted toxic air contaminant emissions. (Have the metal recycling company Atlas Iron & Metal Company located on 10019 S Alameda St, Los Angeles, CA 90002 been monitored or address on Toxic sending over to Jordan High school & community?) 8-13

Chapter 4: CSC can help by sharing those locations with South Coast AQMD via telephone at 1-800-CUT-SMOG and by helping both South Coast AQMD and CARB with community outreach about CARB's idling rules. (Comments: CSC need establish plans to meet with the community to discuss idling rules, reporting process & place idling signs in the neighborhoods. How to address odor complaints and it's monitoring process). The community should informed on the type of monitoring equipment. 8-14

Chapter 4: CARB has heard the concerns of the community regarding diesel powered vehicles and equipment. Areas of concern CARB heard were, issues with heavy-duty diesel vehicle idling, the operation of trucks in and around warehouses, compliance with state heavy-duty diesel vehicle regulations, and the operation of oil and gas extraction facilities in the community.(Do CARB evaluate the quantity of heavy duty diesel vehicle come through SLA community from the ports of LA?) 8-15

Chapter 4: CARB uses inspection equipment like mobile monitoring, optical gas imaging cameras, toxic vapor analyzers, infrared optical gas detectors, and eagle gas monitors as well as drones. CARB will document the results of the inspections and summarize what was learned in a report back to the community. (Comments: What does the CARB Oil & Gas document will contain and how will they report back to the community). 8-16

Chapter 5A - Emissions reduction targets: (Comments: How is the future target plan is determined?) 8-17

Chapter 5B - Mobile Sources: (Comments: when cars are oil & gas reduced cars, the more buses and trains will increase. Do you think it will decrease toxics in the SLA? Electric buses & trains) 8-18

In all our plan Outreach should be addressed to schools, senior centers, churches, nonprofits & neighborhood council. 8-19
Air filtration should also be consider to give to senior centers, libraries, churches & with the schools as planned. 8-20
Establish a Outreach information to discuss rules, regulations, monitoring, enforcement, best practices and provisions to help the community. 8-21
Make sure that old gas station tank has been removed and the soil is monitored. Address new construction on what was there before building. 8-22
Discuss monitoring process and equipment with the community. 8-23

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For More Information Contact: ab617@aqmd.gov

Response to Comment 8-1

Language is included in Chapter 1: Introduction, section "Assembly Bill 617 Program Challenges" to recognize the challenges the designated communities face in AB 617. South Coast AQMD continues to advocate for legislative changes on behalf of the community for more reasonable deadlines and increased and sustained funding for the AB 617 Program. South Coast AQMD and CARB will pursue collaboration with appropriate government agencies (e.g., city, state) as outlined in **Table A8-4**. This CERP seeks funding opportunities to reduce emissions and exposure from the air quality priorities (**Table A8-5**). Additionally, this CERP include outreach and enforcement actions which will lead to more community exposure to the AB 617 program and SLA CERP. South Coast AQMD is eager to begin CERP implementation and will continue to maintain transparency throughout this process.

Table A8-4: SLA CERP Actions Regarding Collaboration with Other Agencies

Chapter: Air Quality Priority	Goal	Action
5b: Mobile Sources	B: Reduce Exposure at Schools	Work with local school districts and the CSC to develop a prioritization list of schools for air filtration systems and to support community projects that reduce students' exposure to air pollution
	F: Agency Collaboration	Pursue collaborations with local agencies to identify strategies to address the CSC's concerns with truck traffic and designated truck routes
5c: Auto Body Shops Emissions and Source Attribution	A: Inform Community of Pertinent Rules	Collaborate with partner agencies who also have jurisdiction over auto body shops to present information regarding their authority at Auto Body Shops Workshop
	C: Agency Collaboration and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during auto body shop inspection sweeps
5d: General Industrial Facilities	B: Identify Strategies	Identify emissions and exposure reduction measures, if appropriate (e.g., collaborating with appropriate agencies)

Chapter: Air Quality Priority	Goal	Action
	D: Agency Collaboration and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's authority jurisdiction during inspection sweeps at general industrial facilities
5f: Oil and Gas Industry	B: Monitoring	Collaborate with appropriate agencies and the CSC to determine if additional air monitoring is needed during specific well activities or under certain conditions
	C: Agency Collaborations and Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during inspection sweeps at oil and gas facilities
	H: Other Governmental Agency Projects	Identify opportunities for other agencies to provide information on their respective oil and gas related authority, existing and proposed rules and regulations, and/or projects and programs

Table A8-5: SLA CERP Actions Regarding Incentives

Chapter: Air Quality Priority	Goal	Action
5b: Mobile Sources	B: Reduce Exposure at Schools	Conduct outreach to the CSC when new funding opportunities are available to install school filtration systems
	D: Mobile Source Incentives	Explore opportunities for incentive funds for cleaner mobile source technologies

Chapter: Air Quality Priority	Goal	Action
5c: Auto Body Shops Emissions and Source Attribution	H: Auto Body Shops Incentives	Explore incentive opportunities for incentives for low-volatile organic compound (VOC) paint and coatings and water-based cleaners
5d: General Industrial Facilities	D: Agency Collaboration and Referrals	Identify emissions and exposure reduction measures, if appropriate (e.g., identifying incentive opportunities)
	C: Dry Cleaners	Identify incentive opportunities to transition to community-identified alternatives
5e: Mobile Sources	C: Identify Strategies	Identify potential strategies and approaches to address the CSC-identified concerns (e.g., incentive opportunities for businesses to incorporate best management practices)
5f: Oil and Gas Industry	I: Oil and Gas Industry Incentives	Explore incentive opportunities to support implementation of best management practices, and/or installation of emission reduction technologies at oil and gas facilities

Response to Comment 8-2

After CERP adoption, South Coast AQMD and the SLA CSC will continue to meet at quarterly CSC meetings. At that time, updates will be provided on CERP implementation progress. South Coast AQMD will also hold regular Monitoring Working Team meetings as need to discuss community air monitoring. Additionally, Annual Progress Reports on CERP implementation will also be provided to the CSC and submitted to CARB for review. In other AB 617 designated communities, during CERP implementation, South Coast AQMD holds one-on-one and/or smaller group meetings and sends emails and/or newsletters to continue transparency and gather additional input. It is expected during CERP implementation, South Coast AQMD will continue to do so in

the SLA community. South Coast AQMD and CARB are committed to building and improving upon existing outreach efforts as outlined in the CERP. Additionally, responsible entity(ies) for the various air quality priority goals and actions can be found in the action tables for Chapters 5b through 5f.

Response to Comment 8-3

Data for on-road emissions (e.g., Southern California Association of Governments (SCAG's) travel demand information on vehicle activity, CARB Emission Factor) are added in Chapter 2d: Emissions and Source Attribution (previously Chapter 3b), section "On-Road Sources." South Coast AQMD is committed to conducting ambient monitoring of air toxics for the Multiple Air Toxics Exposure Study (MATES). South Coast AQMD anticipates initiating monitoring for MATES VI in the 2023/2024 timeframe.

Response to Comment 8-4

South Coast AQMD will conduct focused enforcement at construction sites of concern as identified by the CSC as part of Chapter 5b, Goal E: Construction Sites Enforcement and Chapter 5d, Goal G: Construction Sites Enforcement. Issues found during inspection sweeps that fall outside of South Coast AQMD's authority will be referred to the appropriate agency for follow up. During CERP implementation, South Coast AQMD will provide the CSC updates on these actions.

Additionally, CEQA requires state and local agencies to identify and reduce the environmental impacts of future development projects that may produce emissions during construction. Through the CEQA process, South Coast AQMD has the opportunity to provide technical expertise and recommendations to mitigate air quality impacts. South Coast AQMD has a robust Intergovernmental Review (IGR) program, where CEQA documents are reviewed and South Coast AQMD may provide comments focused on adequacy of air quality analyses. South Coast AQMD CEQA comments are meant as guidance for lead agencies, including local land use agencies or entities, to ensure a reasonable air quality analysis is conducted to estimate air quality impacts, and significant air quality impacts are mitigated to the extent feasible. The lead agency is the public agency that has the primary responsibility for carrying out a project, has discretionary authority over the proposed project, and is responsible for preparing the appropriate CEQA document. In the CEQA document, the lead agency is responsible for identifying air quality impacts from construction and operation, including estimating construction emissions. CEQA environmental analyses are also available to community members at https://ceqanet.opr.ca.gov/. Local land use agencies often consult with South Coast AQMD staff during preparation of an environmental analysis and staff provides mitigation measures to ensure they are incorporated into projects early in the development process. Regarding construction equipment, it is the South Coast AQMD staff's practice when commenting on environmental documents under CEQA to recommend that operators use the cleanest available construction equipment. Lastly, the Draft 2022 AQMP includes a control measure EGM-03:

Emission Reductions from Clean Construction Policy which seeks to ensure operators are using the cleanest construction equipment.

Response to Comment 8-5

South Coast AQMD will conduct air measurement surveys for CSC-identified facilities of concern as outlined in Goal E: Air Measurements Survey in Chapter 5c. Mobile monitoring will be conducted in the SLA community in areas near permitted facilities and in areas of concern identified by the CSC (Section 8.3 "Auto Body Shops" of the Community Air Monitoring Plan (CAMP)). South Coast AQMD will work with the CSC to identify and prioritize auto body shops of concern. Additionally, community members are encouraged to submit public complaints to assist South Coast AQMD with identifying unpermitted auto body shops to determine compliance with South Coast AQMD rules and regulations.

Response to Comments 8-6 and 8-7

The chemical and plastics industry refers to emissions from plastics production in the chemical industry and most of the emissions are from aggregated small industrial sources. South Coast AQMD has generated a list of permitted facilities within the SLA community but has not specifically identified plastics-related operations from the list. As part of CERP implementation, South Coast AQMD will work to identify permitted facilities that manufacture or recycle plastics. Chapter 5e, Goal G: Metal Recycling and Shredding Facilities will initiate rule development for South Coast AQMD Proposed Rule 1460. As part of the rule development process, South Coast AQMD will evaluate emissions from operations at these facilities.

Additional data on the geographical distribution of plastic production is added in Chapter 2d, Table 2d-3 "Emissions from all Sources in SLA in 2019" regarding waste disposal emissions (which include recycling). Toxic air contaminants (TACs) in waste disposal emissions include hexavalent chromium, nickel, benzene, cadmium, lead, and perchloroethylene.

Response to Comment 8-8

Language is clarified in Chapter 2d, section "Future Years Baseline Emissions Inventory". See Response to Comment 1-121.

Response to Comment 8-9

Overall TAC emissions are expected to decrease primarily from on-road and off-road vehicle reductions. However, industrial activity is expected to increase in some sectors based on Southern California Association of Governments (SCAG) economic trends and emissions from those facilities may increase if no additional controls (e.g., more stringent rule requirements) are implemented.

Response to Comment 8-10

See Response to Comment 1-210 regarding CERP actions related to enforcement at construction sites. One of the commitments in Chapter 5b, Goal C is outreach to the community and business and industries by distributing materials related to CARB's mobile source regulations. Chapter 5b,

Goal A commits South Coast AQMD to inform the CSC of applicable South Coast AQMD rules for the CSC-identified facilities.

An "Enforcement Overview" section is included in Chapter 4: Enforcement Overview and History to explain the overall goal and history of South Coast AQMD's enforcement program. Information on CARB's enforcement efforts can be found in Chapter 4 under the section "CARB Enforcement Activity in South Los Angeles." Outreach regarding South Coast AQMD's rules and regulations may be conducted as a part of the more focused enforcement conducted in the SLA community from the CERP actions.

Response to Comment 8-11

For funding incentives in this CERP, please see **Table A8-5**: SLA CERP Actions Regarding Incentives in Response to Comment 8-1.

With respect to educating the community, please see **Table A8-6**: SLA CERP Actions Regarding Outreach (below) for outreach actions in the CERP, including outreach when new funding opportunities arise from actions in Table 8-2.

Table A8-6: SLA CERP Actions Regarding Outreach

Chapter: Air Quality Priority	Goal	Action
5b: Mobile Sources	A: Warehouses and Idling	Conduct outreach to warehouses regarding South Coast AQMD Rule 2305 requirements to reduce the impact of truck traffic
	B: Reduce Exposure at Schools	Conduct outreach to the CSC when new funding opportunities are available to install school filtration systems and work with local school districts and CSC to support community projects that reduce students' exposure to air pollution
	C: CARB Efforts	Conduct outreach to the community and businesses and industries by distributing materials related to CARB's mobile source regulations, best management practices, how to file a complaint, and incentive programs
	D: Mobile Source Incentives	Conduct outreach to the CSC when new funding opportunities are available to incentivize replacing older, higher polluting on-road and off-road equipment with cleaner technology

Chapter: Air Quality Priority	Goal	Action
Chapter 5c: Auto Body Shops	A: Inform Community of Pertinent Rules	Conduct a workshop describing applicable rules and regulations, permitting process, and enforcement efforts around auto body shops
		Collaborate with partner agencies who also have jurisdiction over auto body shops to present information regarding their authority at Auto Body Shops Workshop
		Collaborate with CSC to present information regarding their concerns related to auto body shops at Auto Body Shops Workshop
	C: Agency Collaboration and Referrals D: Outreach to Owners or Operators	Conduct targeted outreach to owners or operators, including providing information on best management practices, South Coast AQMD's Small Business Assistance Program, permitting process, and applicable rules and regulations
		Conduct outreach to CSC-identified locations to encourage incorporation of best management practices and "Good Neighbor" practices
	H: Auto Body Shops Incentives	Conduct outreach to the CSC when new funding opportunities are available to incentivize low-VOC paint and coatings and water-based cleaners
Chapter 5d: General Industrial Facilities	A: Identify Facilities of Concern	Inform CSC of applicable South Coast AQMD rules for the CSC-identified facilities
		Collaborate with CSC to improve outreach to small businesses to encourage incorporation of best management and "Good Neighbor" practices
	B: Identify Strategies	During permit application process, provide education information to the permit applicants of cleaner alternative technologies

Chapter: Air Quality Priority	Goal	Action
	C: Dry Cleaners	Community outreach to owners or operators regarding alternatives, incentive opportunities
	E: F.I.N.D. Tool and Filing Complaints	Conduct community outreach on F.I.N.D. tool including training on how to use the F.I.N.D. tool to search for information about South Coast AQMD-regulated facilities and on filing air quality complaints by phone, web, or mobile application
Chapter 5e: Metal Processing Facilities	A: CARB Regulations	Conduct a community workshop on the Criteria Pollutant and Toxics Emissions Reporting (CTR) process and share the data that has been collected from facilities in the community
	B: Identify Metals Facilities	Provide a list of South Coast AQMD rules applicable to the metals facilities identified
	E: Emissions Data	Provide informational handout or presentation which includes an overview on criteria pollutants and toxics that may be found in the community
	F: Outreach to Owners or Operators	Conduct targeted outreach to metals facility owners or operators in the community, including providing information on best management practices, South Coast AQMD's Small Business Assistance Program, permitting process, and applicable rules and regulations – with a focus on new rule requirements from CARB and South Coast AQMD
		Collaborate with communities and businesses to encourage incorporation of best management and "Good Neighbor" practices
Chapter 5f: Oil and Gas Industry	A: Air Measurement Surveys	Provide outreach on the online tools to access monitoring data

Chapter: Air Quality Priority	Goal	Action
	D: Enforcement Updates	Provide periodic summaries of findings from enforcement activities, such as whether odors or emissions were confirmed or verified with complainants at a specific site or source and any enforcement action taken
	H: Other Governmental Agency Projects	Identify opportunities for other agencies to provide information on their respective oil and gas related authority, existing and proposed rules and regulations, and/or projects and programs
	I: Oil and Gas Industry Incentives	Conduct outreach to the CSC when new funding opportunities are available to incentivize best management practices and/or install emission reduction technologies

Response to Comment 8-12

This language is included as information regarding emissions in the SLA boundary and is revised for clarification. Chapter 2d contains information about the sources of air pollution in this community.

Response to Comment 8-13

South Coast AQMD has several existing rules to address hexavalent chromium emissions, including Rules 1407.1, 1426, 1469, and 1469.1. Additionally, South Coast AQMD is in the process of or will be developing four new rules that will further address hexavalent chromium emissions: Proposed Rule 1426.1 – Hexavalent Chromium Emissions from Metal Finishing Operations; Proposed Rule 1435 – Control of Emissions from Metal Heat Treating Processes; Proposed Rule 1455 – Control of Hexavalent Chromium Emissions from Torch Cutting and Welding; and Proposed Rule 1445 – Control of Toxic Emissions from Laser Arc Cutting.

Atlas Iron & Metal Co. is a metal recycling and scrapyard facility and, is not subject to these rules. Additionally, Atlas Iron & Metal Co. does not have any permits and is not required to have a permit with South Coast AQMD. Therefore, to address metal recycling facilities and metal scrapyards, Goal G in Chapter 5e commits South Coast AQMD to initiate the rule development process for Proposed Rule 1460 – Control of Particulate Emissions from Metal Recycling and Shredding Operations.

South Coast AQMD has conducted an investigation near Jordan High School and has conducted over 20 field operations since June 2020, including inspections, in connection with Atlas Iron & Metal Co. These inspections included site visits at Jordan High School (located at 2265 E. 103rd

St. in Los Angeles) and at Southeast Middle School (2560 Tweedy Blvd. in South Gate). To date, there have been no violations cited to the facility for air quality rules or regulations. For further information on these efforts, you can refer to our webpage on the Jordan High School Community Investigation at https://www.aqmd.gov/home/news-events/community-investigations/jordan-high-school.

Response to Comment 8-14

South Coast AQMD revised and added new language in Chapter 5b, Goal C: CARB Efforts for CARB to conduct outreach to the community and distribute materials on CARB's mobile source regulations, best management practices, how to file a complaint, and incentive programs. CARB will also conduct an activity or solicit input for feedback on its complaint system. CARB will also install "No Idling" signs at CSC-identified locations. See Response to Comment 1-189 for enforcement of mobile source regulations, including "No Idling" regulation. Chapter 4, section "Public Complaints" discusses how South Coast AQMD addresses odor complaints. Chapter 4 also discusses South Coast AQMD's enforcement program, and information on CARB's enforcement efforts.

The air monitoring process and equipment are discussed in the CAMP Section 6 "Air Monitoring Equipment and Methods". Additionally, these are discussed as part of the Monitoring Working Team (MWT) meetings held during CERP and CAMP development. Updates from the MWT meetings can be provided at the quarterly CSC update meetings, as needed.

Response to Comment 8-15

CalTrans evaluates the quantity of heavy-duty diesel vehicles coming through SLA on state highways from the Ports of Long Beach and Los Angeles (Ports). More information regarding traffic volume data may be found here: https://dot.ca.gov/programs/traffic-operations/census. While CARB does not conduct these evaluations, CARB's Enforcement Department does conduct inspections throughout the Southern California region on trucks coming from and going to the Ports.

Response to Comment 8-16

The results of CARB inspections will be included in a brief report and shared with the CSC annually. CARB will also share the results in a presentation beginning third Quarter 2023. Additional report backs are available (semi-annually) if requested by the CSC.

Response to Comment 8-17

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution, Table 5a-1 "CERP Emission Reduction Targets", includes language to explain that emission reduction targets are from statewide (CARB) measures and projected incentive projects (assuming a minimum of $10 million invested for mobile source projects). Additional language is added to section "Estimated Emissions Reductions from CARB Statewide Measures" to further explain emission reductions from CARB statewide measures.

Response to Comment 8-18

Future emissions from buses are projected to decrease and emissions from trains are not expected to increase significantly. As shown in Chapter 2d, section "Future Year Baseline Emissions Inventory", Figure 2d-21 "TAC Emissions from All Sources in SLA", overall TAC emissions are expected to decline by 2031 from overall reductions in vehicle emissions and ongoing implementation of existing regulations and incentive programs.

Toxic emissions (e.g., DPM) associated with the combustion of petroleum fuels in vehicles will decrease as the implementation of regulations, incentive programs, and the transition to cleaner fuels occur. Actions in Chapter 5b will reduce emissions from and exposure to mobile sources including trucks and buses. South Coast AQMD will explore incentive opportunities for cleaner mobile source technologies within the community as outlined in Chapter 5b, Goal D. Additionally, South Coast AQMD will conduct outreach to the CSC when new funding opportunities are available to incentivize replacing older, higher polluting on-road equipment with cleaner technology.

Response to Comment 8-19

See Response to Comment 8-11 for information on outreach actions. Additionally, South Coast AQMD will work with the CSC to organize outreach efforts. South Coast AQMD also conducts air quality education programs at schools. These include the Clean Air Program for Elementary Students (CAPES) and Why Health Air Matters (WHAM). Information on CAPES and WHAM can be found here, respectively: http://www.aqmd.gov/home/programs/education/capes and http://www.aqmd.gov/home/programs/education/wham.

Response to Comment 8-20

The California Constitution (Art. 16 § 5) does not allow for public funds, such as CARB's Community Air Protection (CAP) incentive funds, to be used for churches. Funds for libraries or senior centers may be allocated by the community in the future provided the facility is public and not located at a private school or senior center with religious affiliation. Supplemental environmental projects (SEPs) are environmentally beneficial projects that are included as part of a settlement for environmental violations. These projects are outside of the AB 617 program and must meet certain requirements. SEPs can be air filtration system projects at libraries and senior centers or other projects as outlined by the SEP requirements. More information on SEPs can be found here: https://calepa.ca.gov/enforcement/supplemental-environmental-projects/. South Coast AQMD can provide information on air filtration system funding opportunities that become available during CERP implementation.

Response to Comment 8-21

Please see Response to Comment 8-11 for information on outreach actions. The outreach actions include conducting outreach and providing updates on rules and regulations, monitoring data, best management and "Good Neighbor" practices, incentives, enforcement efforts.

Response to Comment 8-22

The removal of old gas station tanks is regulated by South Coast AQMD Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing. The rule requires tanks to be degassed prior to removal to prevent fugitive VOC emissions. Clean-up sites are not within South Coast AQMD's authority but fall within the authority of other agencies. For example, chemical contamination of groundwater resulting from dry cleaners may be addressed through implementation of multiple cleanup programs to restore and protect groundwater quality. These cleanup programs may be implemented by the State Water Resources Control Board, Regional Water Quality Control Boards (Water Boards), the Department of Toxic Substances Control (DTSC), and local agencies statewide. South Coast AQMD Rules 1166 and 1466 regulate soils contaminated with VOCs or TACs, respectively, which are enforced directly by South Coast AQMD. DTSC, Water Boards, and other regulatory agencies often directly cite these regulations in their clean-up plans.

South Coast AQMD is specifically prohibited by state law from making land use decisions and does not have land use authority. These decisions are generally made by city or county planning agencies. Thus, South Coast AQMD lacks the authority to regulate the physical development of land, type of uses on these lands, such as zoning (e.g., residential, commercial, industrial), and the proximity of areas zoned within each other (e.g., siting residences near industrial sources). South Coast AQMD will refer issues that fall outside of South Coast AQMD's authority to appropriate agencies during inspection sweeps and from public complaints received. These actions are in Chapter 5c: Auto Body Shops, Goal C: Agency Collaboration and Referrals; Chapter 5d: General Industrial Facilities, Goal D: Agency Collaboration and Referrals; and Chapter 5f: Oil and Gas Industry, Goals C: Agency Collaboration and Referrals. Additionally, South Coast AQMD will conduct focused enforcement at construction sites of concern as identified by the CSC as part of Chapter 5b, Goal E and Chapter 5d, Goal G.

Response to Comment 8-23

The air monitoring process and equipment are discussed in the CAMP Section 6 "Air Monitoring Equipment and Methods". Additionally, these are discussed as part of the MWT meetings held during CERP and CAMP development. South Coast AQMD will continue to hold MWT meetings and provide updates during CERP implementation.

Comment Letter #9 – South Los Angeles Community Co-Leads, South Los Angeles Organizations, and Academic Partners

Martha Dina Arguello and Paula Torrado Plazas, Physicians for Social Responsibility-Los Angeles (PSR-LA); Gina Charusombat, Strategic Concepts in Organizing and Policy Education (SCOPE); Jacquelyn Badejo and Linda Cleveland, Watts Clean Air and Energy Committee (WCAEC); Jill Johnston, PhD, University of Southern California, Keck School of Medicine; Hugo Garcia, Esperanza Community Housing; Reverend Louis Chase, Holman United Methodist Church; Richard Parks, Redeemer Community Partnerships; Veronica Flores, Community Health Councils; Andrea Williams, Southside Coalition of Community Health Centers; Tori Kjer, Los Angeles Neighborhood Land Trust; Astrid Williams, Black Women for Wellness; Veronica Padilla-Campos, Pacoima Beautiful

April 28th, 2022

Wayne Nastri
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

RE: Comments and Recommendations to Strengthen the South LA AB 617 CERP

The undersigned social, health and environmental justice groups strongly support strengthening the South LA Community Emissions Reduction Plan (South LA CERP) to achieve the goals of AB 617 and truly reflect a community driven approach to localized emissions reductions that will achieve tangible improvement in health and air quality.

Air pollution in South Los Angeles emanates from a variety of sources, both stationary and mobile. Our community is peppered among residential homes, schools, recreational facilities, and commercial establishments are auto body shops, metal manufacturing facilities, oil and gas extraction sites, warehouses, and other industrial sites. Freeways and high-volume thoroughfares surround and crisscross this urban landscape. These pollution sources regularly emit harmful gasses and particles, often above health standard levels, which combined with other socio-economic and environmental determinants of health, significantly impact the health and well-being of South LA's residents.[1]

9-1 South LA communities cannot afford to implement programs that will not result in tangible emissions reduction. **Community members, members of the SCLA-PUSH project, AB617 South LA Community Steering Committee (CSC) members, community organizations, and academic experts,** who have for decades work towards ensuring social and environmental justice in South LA, are demanding that the South LA CERP is recentered in the long-term goal of improving local air quality and thus the quality of life and health of residents. Community members include 20 SCLA-PUSH Air Quality Ambassadors trained residents, 12 SCOPE CSC members, 10 Watts Clean Air CSC members, and 5 PSR-LA CSC members.

9-2 Given the urgent need to protect South LA residents from toxic air pollution, the South LA CERP needs to re-focus on developing direct pollution reduction measures with and in a manner that prioritizes the health and well-being of communities. Generally the vast majority of

[1] https://sclapush.org/user/themes/sclapush/files/SCLA-PUSH_Final_Report_2019-2020.pdf

the actions listed in the current South LA CERP draft do not require or propose to require the development of quantifiable, permanent, and enforceable emissions reductions beyond what is already required by existing law.[2]

> "Permanent, enforceable emissions reductions are essential for communities so that they can count on and enforce the intended emissions reductions. While other types of measures may also be worthwhile, a lack of enforceable and permanent measures may mean that communities' air will not improve in a significant way as a result of these plans."[3]

9-2 cont.

General Recommendations to Strengthen the SLA CERP:

Several actions throughout the South LA CERP – listed in Chapters 5A through 5G – are too vague, overly focused on outreach and research, and are not **quantifiable emissions reduction actions**. Many of the SLA CERP actions include language such as, "conduct outreach," "distribute outreach materials," "conduct workshops," "collaborate with other agencies," "educate the community," etc. While these actions are important to engage regulated industries and the community in the AB617 implementation process, education and outreach rarely translateto tangible emissions reduction. We demand that these actions be coupled with new regulations, rule proposals, and enforcement measures that aim to reduce emissions.

To achieve these tangible, measurable, and enforceable emissions reductions in South LA, the South Coast Air Quality Management District (SCAQMD) must include the implementation of community driven strategies, Best Available Control Technologies (BACT), Best Available Retrofit Control Technology (BARCT), businesses and industries best practices, continuous monitoring, and community-led enforcement plans. To support our broader vision to improve air quality at the pace and with the urgency needed, the actions we demand to see in the South LA CERP include but are not limited to the following:

9-3

- Require BACT/BARCT implementation for all industries throughout the permitting process,

[2] https://caleja.org/wp-content/uploads/2021/05/CEJA_AB617_r4-2.pdf
[3] 40 C.F.R. Section 63.2 (defining federally enforceable).

9-3 cont.
- Phase out chemical usage in industrial operations and enforce BACT for chemical substitutions with the least harmful alternatives and safer cleaner technologies that will protect health;

9-4
- Require installation of zero emissions equipment when feasible and zero emissions fleet for industrial operations;
- Prohibit the use of fossil fuels/diesel power generation for all industries and provide access to incentives for implementation of cleaner energy technologies;

9-5
- Require implementation of good neighborhood agreements and businesses/industries best practices to reduce emissions such as emissions entrapment technologies or requiring equipment locations to be trapped on-site to reduce communities exposure, diesel sweepers, and mandatory monitoring on site.

Include Detailed Enforcement Plans To Reduce Emissions:

The current South LA CERP actions include generic language that is vague in terms of how those proposed actions will achieve emissions reductions. Throughout Chapters 5A - 5F, and more specifically for the chapters on general industrial facilities, auto body shops, and metal facilities, actions include language such as "identify sources of concern," "prioritize facilities of concern," "identify locations of concern," "inform businesses on rules and regulations".[4] An example of this lack of measurable actions language can be seen in the SLA CERP chapter 5E goals B and C.

9-6 These actions are redundant and do not further the goals of AB617 as these focus on implementing what currently exists in the regulatory landscape. Inequitable and inadequate enforcement by SCAQMD has perpetuated the air pollution disparities faced by South LA communities and is insufficient to advance environmental justice. Identifying sources of concern and prioritizing facilities should not be a CERP action given that this was already completed through the active engagement of residents during the CSC's multiple meetings. We demand that these actions be coupled with detailed enforcement plans, new rule development, and regulations as required under the AB617 mandate to ensure efforts "maximiz[e] emissions reductions". Merely identifying sources within the next 5 years for the CERP implementation will not improve air quality in South LA. While identifying sources is an important step in the process, these actions must be coupled with environmental justice-driven enforcement plans.

[4] http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/cerp/preliminary-draft/ch5e.pdf?sfvrsn=15

9-7 Additionally, this CERP does not state how the current listed actions target specific and all pollutants of concern, and the expected emissions reductions of such targets are vague. We want to see more specific enforcement actions that are linked to all pollutants of concern. We want to see reflected in the CERP what pollutants will be monitored, what actions can reduce these pollutants, and how these reductions will occur.

Community Driven Enforcement and Data Transparency:

9-8 Data transparency is an essential component of a successful CERP. There is an imbalance of knowledge which benefits and privileges regulatory agencies in this process. While the community must take great strides to access, analyze and understand permit, emissions, air monitoring and inspection data, this is readily available to SCAQMD. All action plans must integrate data transparency and facilitate the transfer of data to community members and their partners. This information should be provided to the community in understandable formats and multiple languages. The South LA CSC should have access to readily available and timely enforcement data including public notification of new permits, updated emissions reports and inspections information on the SCAQMD AB617 website. This is key in ensuring communities are informed of the process and have a better understanding of how enforcement actions are being implemented to establish community-enforced air quality improvement metrics.

9-9 SCAQMD should strive to address compliance and enforcement gaps in hard to reach industries by improving the reporting and complaints system and allow community ground truthing efforts to inform enforcement actions. Lastly, SCAQMD tools that are used to access

9-10 permitting facilities data such as F.I.N.D need to be improved in terms of their interface. The F.I.N.D tool is not accessible, hard to navigate, and often leads to irrelevant information regarding polluting facilities. We request that as part of the South LA CERP, SCAQMD allocates resources and efforts to improve F.I.N.D to search by pollutant; enable the download of all records and multiple records at once; allow for all data to be accesses readily, and include oil and gas extraction facilities.

Health Metrics Recommendations:

9-11 Establishing health metrics associated with South LA CERP actions can support the evaluation process of the plan implementation. It is important that the South LA CERP actions include documenting how existing health disparities be addressed. A recommendation to ensure health protective measures and evaluation metrics are included in the South LA CERP is the

9-11 cont. creation of a South LA Health Advisory Board, which can help evaluate the CERP actions and metrics and create collaborations with health clinics and health professionals that can support the implementation process.

Specific Air Quality Priorities Recommendations:

Oil and Gas:

- 9-12 Create new rule amendment to SCAQMD rules 1148.1 and 1148.2 to include injections well in public notifications, ban chemical odorants in acid work, and add mandatory public notices for when acid works are done.
- Mandate the electrification of all equipment used in Oil and Gas operations including the use of diesel trucks;
- 9-13 Ban fossil fuels/diesel power generation and electrify diesel workover rigs;
- Mandate the replacement of on-site polluting/dirty equipment (eg diesel-powered) with less polluting/greener alternatives;
- 9-14 Ban the use of chemicals odorants at Oil and Gas operations;
- 9-15 Conduct frequent and responsive targeted monitoring for defined Oil Well activities including flaring, odors, stimulation, noise and acid work;
- 9-16 Mandate air monitoring equipment on site for Oil and Gas operations that detects methane and VOC leaks to ensure compliance and support enforcement and inspections processes;
- 9-17 Support the Oil and Gas wells phase-out efforts of the City of LA and LA County by creating collaborations with those agencies;
- 9-18 Inform the community of inspections and compliance efforts.

General Industries (Dry Cleaners and Warehouses):

- 9-19 Require the improvement of SCAQMD's reporting/complaints response systems for small stationary sources by conducting outreach and reporting enforcement actions regularly to the community.
- 9-20 Create new rule amendment to SCAQMD rule 1102 to classify Professional Wet Cleaning as BACT in the permitting process for new dry cleaners, to ensure new dry cleaners use the safest cleanest alternative that reduce emissions and address legacy contamination
- 9-21 Create a new incentive and support program to allow ALL dry cleaners to switch from PERC and hydrocarbons based solvents to Professional Wet Cleaning, including

9-21 cont. amendment of funding from AB998 to ensure fee includes hydrocarbons and can fund transition to PWC.

9-22
- Phase out existing non-perc dry clean solvent machines after useful life and remove regulatory exemptions for non-perc dry clean solvent machines

9-23
- Provide annual updates on the compliance of all warehouses with the Indirect Source Rule (ISR).
- Provide information about daily trucks count and other diesel equipment used under the ISR implementation.

Auto Body Shops:

9-24
- Develop a rule amendment to SCAQMD rules 1151 and 1171 to include EPA Auto body shops Best Practices as required BACT in the permitting process for auto body shops;

9-25
- Incentivize the implementation of best practices including the use of low VOCs coat paintings and use of water based cleaners and coatings to help reduce emissions at the source.

Metal Facilities:

9-26
- Require amendments of SCAQMD rules 1407 and 1420 to include best practices that can reduce emissions including integration of: 1) ride along wet sweeper, 2) stacks equipment to trap emissions on site, and 3) installation of monitors on site;

9-27
- Integrate new rulemaking to replace the use of Hexavalent chromium and applicability to South LA metal facilities;

9-28
- Review actions to reduce pollutants at the fenceline of metal recycling facilities.
- Collaborate with appropriate agencies to assess potential soil contamination in fenceline neighborhoods;

9-29
- Expand emissions reporting requirements to address gap between the many number of permitted metals facilities and the very few required to participate in AQMD's Annual Emissions Reporting (AER) program;

9-30
- Develop good neighbor policies between CSC members and metal facilities representatives to spearhead pilot projects of implementation of best practices to reduce emissions and community led solutions.

Mobile Sources:

9-31
- Address No Idling rules compliance gaps;

9-32
- Require and mandate zero emissions trucks for industries operations and provide incentives pathways for businesses to transition their operations fleet;

9-32 cont.

It is not clear how the California Air Resources Board (CARB) is meeting the requirement to develop and implement the mobile sources actions in the South LA CERP. CARB should be working collaboratively with SCAQMD and the CSC to develop mobile source actions. Further, the mobile source rules referenced in the South LA CERP (Chapter 5a) were already being planned and thus do not reflect any additional assurance of emissions reductions in South LA. We urge CARB and the local air district to work with the community to identify gaps in mobile sources CERP actions such as community access to EV's and address diesel operations trucks.

Conclusion

9-33

Our major concern regarding the South LA CERP is that many of the actions listed do not require concrete emissions reductions beyond what is already required by existing programs and laws. The CERP thus does not reflect the needs and priorities identified by the CSC to address pollution burden. The majority of the CERP actions rely on research, incentives, and outreach rather than actual concrete regulatory requirements. Incentives, while important, do not assure emissions reductions. South LA CERP measures are vague and refer only to potential future actions—not clear enforceable regulatory actions.

9-34

As community and environmental justice advocates, we urge the SCAQMD to take our recommendations and strengthen the South LA CERP to ensure its implementation is centered on the communities needs and aims at achieving the mission of AB617 - to reduce pollution burden in disadvantaged communities. We are thankful for the opportunity to address our concerns regarding the South LA CERP and we look forward to the work we can do together to improve the AB617 implementation in reflection of the communities we serve and their vision for cleaner, safer, and healthier communities for all.

Sincerely,

AB617 SLA CSC Co-Leads:

Martha Dina Arguello
Executive Director,
Physicians for Social Responsibility- Los Angeles

Paula Torrado Plazas
Manager of Health and Environment Programs,
Physicians for Social Responsibility - Los Angeles

Gina Charusombat
Policy and Research Associate,
Strategic Concepts in Organizing and Policy Education

Jacquelyn Badejo,
Watts Clean Air and Energy Committee

Linda Cleveland,
Watts Clean Air and Energy Committee

South-LA Organizations:
Hugo Garcia
Environmental Justice Program Coordinator,
Esperanza Community Housing

Reverend Louis Chase,
Holman United Methodist Church

Richard Parks
President,
Redeemer Community Partnerships

Veronica Flores
Chief Executive Officer,
Community Health Councils

Andrea Williams
Executive Director,
Southside Coalition of Community Health Centers

Tori Kjer
Executive Director,
Los Angeles Neighborhood Land Trust

Astrid Williams,
Environmental Justice Program Manager,
Black Women for Wellness

Veronica Padilla-Campos,
Executive Director,
Pacoima Beautiful

Academic Partners:

Bhavna Shamasunder, PhD
Occidental College

Jill Johnston, PhD
University of Southern California
Keck School of Medicine

Response to Comment 9-1

South Coast AQMD recognizes and appreciates the efforts and dedication of the community co-leads, CSC members, and community representatives to continuously work and collaborate to develop the CERP and CAMP. The overall goal of AB 617 and the CERP is to improve public health from air quality related issues within the community. Throughout the CERP development process, South Coast AQMD worked with the community co-leads and the CSC to identify the community's air quality concerns. Upon conducting various activities to prioritize the community's air quality concerns, South Coast AQMD developed corresponding goals and actions to reduce air pollution emissions from sources within the community and reduce air pollution exposure for the people in the community. As part of that process, South Coast AQMD partnered with the community co-leads and held over 20 community meetings during CERP development. Additionally, South Coast AQMD and the community co-leads had over 60 meetings (including weekly meetings). The resulting actions identified through that process are to be implemented by government agencies in collaboration with the community co-leads, CSC, community-based organizations, businesses, and other entities, as described in subchapters 5b through 5f, which focus on each air quality priority identified by the CSC. The implementation of the CERP will achieve emission reductions and these emission reductions will provide long-term benefits for public health above and beyond existing air quality programs in place.

Response to Comment 9-2

This CERP pursues a suite of actions (e.g., rule development, focused enforcement, incentives, outreach) to achieve tangible emission reductions. Some actions meet State Implementation Plan (SIP) creditable criteria, which can be found here: https://www.epa.gov/advance/sip-credit-and-air-quality-planning-resources-advance-areas, and some do not; however, they are all equally important to the emissions and exposure reduction goals of this CERP. Please note that actions that do not meet SIP creditable criteria can still result in quantifiable emission reductions (e.g., rules that focus on toxic air contaminant emissions that are not submitted for SIP credit).

This CERP is designed so the CSC may provide input to help South Coast AQMD determine where and how to focus enforcement efforts. This collaborative approach can mean actual change within this community. For example, if there are particular sources causing a public nuisance, South Coast AQMD can help community members make the most effective use of the complaint process and then issue violations, as appropriate, that can potentially force changes in facility operations. Enforcement is used to deter facilities from violating the requirements of federal, state, and local air quality rules, as well as permit conditions. On its own, enforcement is not a reliable metric for overall emissions reductions and cannot be used to require facilities to reduce emissions beyond what is already required by existing law. South Coast AQMD is confident that a more focused and community-centered approach, as envisioned by the AB 617 program, can allow South Coast AQMD's enforcement of existing regulations to successfully address many of the CSC's concerns. See Response to Comment 6-12 regarding emission reductions from CERP actions and metrics.

Chapter 5a, section "Emissions Reduction Targets" includes a discussion regarding on-going rule development by South Coast AQMD with potential emissions reductions. Additionally, this CERP commits to adopting or amending several rules (e.g., 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene, 1148 Series – Oil and Gas Wells, 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, 1171 – Solvent Cleaning Operations, and 1460 – Control of Particulate

Emissions from Metal Recycling and Shredding Operations). Emission reductions for these rules will be quantified during the rule development process based on the provisions of the proposed rule or amendment. Establishing emission reduction targets for metal processing facilities is challenging as there are a wide variety of toxic air contaminants that vary for the different metal processing activities. Fugitive emissions are generally a significant portion of metal processing emissions and are very difficult to quantify. See Chapter 2d: Emissions and Source Attribution, section "Future Year Baseline Emissions Inventory" for additional information on reduction efforts for fugitive emissions.

Response to Comment 9-3

South Coast AQMD's Regulation XIII: New Source Review requires BACT for all new or modified permitted equipment or processes with an emissions increase of one pound per day or more. This ensures when an operator is modifying or installing equipment, the equipment will meet the cleanest emission standards for that class and category of equipment. See Appendix 5a: South Coast AQMD Regulatory Program and Ongoing Efforts for additional information on New Source Review (NSR).

The South Coast AQMD follows specific guidelines for establishing BACT levels. BACT represents the lowest achievable emission limit for a specific class and category of equipment where the class and category represent the equipment type, size, fuel, and for some categories the application of the equipment or specific operating parameters. For example, a class and category can be for an internal combustion engine that ranges in size from 175 to 250 brake horsepower, that is burning diesel fuel, that is used for emergency back-up purposes only. This level of specificity for the "class and category" is needed to ensure that the emission level can be achieved in practice at the time the unit is being permitted. BACT limits are emission standards and do not require a specific technology, ban, or prohibit specific types of equipment or fuels.

BACT emission limits or standards are generally established through the permitting process. When a more stringent and enforceable emission limit is established through permitting, the South Coast AQMD evaluates that new limit for a new BACT listing by determining if it is achieved in practice and cost effective for minor sources, as described in the BACT Guidelines (http://www.aqmd.gov/home/permits/bact/guidelines). The BACT Guidelines identify BACT determinations for classes and categories of equipment, as required by Section 40440.11, and are separated into two sections: major sources or Title V facilities, and minor sources. A facility is determined to be a major and minor source based on potential to emit emissions. BACT for minor sources is set through the BACT Guidelines that are approved by the Governing Board. These BACT determinations are not made separately for each piece of equipment, but rather based on the class or category of source and accounts for cost-effectiveness. As explained above, BACT is not a technology forcing process for existing permitted equipment and cannot be applied retroactively to existing permit units. The BACT process also does not require an operator switch to a different class and category of equipment. For example, if an operator has an application for a new natural gas boiler, that natural gas boiler would be required to meet the BACT standards. Implementation of BACT would not require the operator to switch to an electric boiler, or to use another type of equipment to meet the BACT standard. Generally, when there is a prohibition, those provisions have been addressed through regulatory efforts.

BARCT emission limits generally apply to existing equipment or processes with criteria pollutant emissions. California Health and Safety Code Section 40406 defines BARCT as "an emission limitation that is based on the maximum degree of reduction achievable, taking into account environmental, energy, and

economic impacts by each class or category of source." Because BARCT is established for a class or category of source, BARCT levels are set by rules rather than by individual permit decisions. In addition, Health and Safety Code Section 40920.6 establishes requirements prior to adopting rules or regulations regarding retrofit control technologies. Some of these requirements include identifying one or more potential control options which achieves the emission reduction objective for the regulation, reviewing the information developed to assess the cost-effectiveness of the potential control option, where cost-effectiveness is defined as the cost, in dollars, of the potential control option divided by emission reduction potential, in tons (i.e., the amount of dollars per ton of nitrogen oxides (NOx) reduced). In addition, state law requires that the incremental cost-effectiveness for the potential control options is analyzed, where the incremental cost-effectiveness is the difference in the costs divided by the difference in the emission reduction potential between each progressively more stringent potential control option as compared to the next less expensive control option.

Establishing BARCT emission limits is an iterative process where limits are updated based on the evolution of pollution control technologies. BARCT requirements can be technology forcing, provided the technology will be available by the implementation date specified in the rules or regulations. South Coast AQMD is in the process of expeditiously implementing BARCT for its NOx rules. Compliance with these new or amended rules is evaluated during the permitting process as well as during unannounced, periodic compliance inspections. See Appendix 5a for additional information on BACT and BARCT requirements.

When making a decision to phase out a specific chemical there are a variety of considerations (e.g., if there are technically feasible alternatives; does the alternative have other environmental impacts; the cost impact associated with the alternatives; if there are pollution control technologies and best management practices that can reduce the air quality impact). In certain industrial applications, limits in chemical usage have been included in certain regulations. When establishing emission standards or banning a chemical or material, it has been the practice of the South Coast AQMD to be technology neutral. For example, South Coast AQMD Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems phased out perchloroethylene (PERC) in dry cleaning facilities due to the toxicity of PERC which is a carcinogen, and allowed operators to select alternative non-PERC technologies. In addition, certain chemicals such as methylene chloride and PERC are banned in a number of rules regulating coatings and solvents.

Two actions have been added to this CERP to better address this comment. In Chapter 5d: General Industrial Facilities, Goal C: Dry Cleaners commits South Coast AQMD to initiate rule development for Rule 1102, which regulates petroleum dry cleaning machines, to consider establishing a new emission standard reflecting zero-emission technologies for new dry cleaning systems. In addition, the CERP also includes a provision in Chapter 5d, Goal B: Identify Strategies that during the permit application process, South Coast AQMD will provide information to the permit applicants of cleaner alternative technologies (e.g., commercially available zero-emissions technology, non-toxic alternatives). The information can highlight benefits of the zero-emission technologies including those technologies that do not require a permit by the South Coast AQMD.

Response to Comment 9-4

CARB has primary authority over emissions from motor vehicles and the South Coast AQMD has primary authority over stationary sources in the Basin (California Health and Safety Code, Section 40000). However, California Health and Safety Code, Section 40716 recognizes air districts may adopt and

implement regulations that control emissions from indirect and areawide sources to meet state ambient air quality standards.

In January 1988, the South Coast AQMD Governing Board adopted a Clean Fuels Policy that included a requirement to use clean fuels as part of BACT and Lowest Achievable Emission Rate (LAER). A clean fuel is one that produces air emissions equivalent to or lower than natural gas for NOx, sulfur oxides (SOx), reactive organic gases (ROGs), and particulate matter (PM10). However, in many cases South Coast AQMD is unable to prohibit the use of fossil fuels. Further, we believe that any policy that aims to phase-out the use of fossil fuels needs to be coordinated with a number of state agencies, including the Public Utilities Commission (PUC), the California Energy Commission (CEC), and CARB. State law (SB 100 – The 100 Percent Clean Energy Act of 2018) already calls for a phase out of fossil fuels (zero-carbon goal) in the electricity generating sector by 2045, through coordinated action of these state agencies. According to the Energy Information Administration, almost all petroleum used in California is used in the transportation sector. Under both the Clean Air Act and state law, South Coast AQMD does not have authority over the composition of motor vehicle fuels. Therefore, the South Coast AQMD could not phase out fossil fuel use in motor vehicles.

There are similar legal barriers for South Coast AQMD to require zero emission fleets for industrial operations as South Coast AQMD does not have primary authority over motor vehicles. However, there are a number of state policies and regulations underway to increase the use of zero emission vehicles. In 2018, CARB was directed by Governor Jerry Brown to assess possible regulatory requirements to ensure greater inclusion of zero-emission vehicles in public and private light- and heavy-duty vehicle fleets. As CARB looks for ways to meet the state's five million zero-emission vehicles target by 2030, the conversion of public and private fleets to zero-emission vehicles will increase. Also, in June 2020, CARB adopted the Advanced Clean Trucks regulation requiring truck manufacturers to transition from producing diesel trucks and vans to electric zero-emission trucks including heavy-duty vehicles beginning in 2024. Information about the Advanced Clean Trucks Rule can be found at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

CARB is also developing a medium- and heavy-duty zero-emission fleet regulation with the goal of achieving a zero-emission truck and bus California fleets by 2045 everywhere feasible and significantly earlier for certain market segments such as last mile delivery and drayage applications. Information about the draft regulation can be found at https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets/advanced-clean-fleets-meetings-events.

Further, in September 2020, Governor Gavin Newsom issued an executive order requiring sales of all new passenger vehicles to be zero-emission by 2035 and additional measures to eliminate harmful emissions from the transportation sector. CARB is charged with developing regulations to mandate that 100 percent of in-state sales of new passenger cars and trucks are zero-emission by 2035 – a target which would achieve more than a 35 percent reduction in greenhouse gas emissions and an 80 percent improvement in NOx emissions from cars statewide. Information about the executive order can be found at https://ww2.arb.ca.gov/resources/fact-sheets/governor-newsoms-zero-emission-2035-executive-order-n-79-20.

A provision has been added in Chapter 5f Goal E for rule development of the South Coast AQMD Rule 1148 Series that commits to evaluating during the rulemaking a requirement for operators to use the

cleanest available equipment when conducting well activities. The focus will be on zero-emission technologies; however, zero-emission technologies may not be available for all equipment.

See Response to Comment 1-208a regarding incentives for cleaner energy technologies.

Regarding zero-emission technologies for stationary sources, the 2022 Draft Air Quality Management Plan has a number of control measures for residential, commercial, and industrial combustion equipment to move towards zero emission technologies. These control measures cover a wide variety of combustion equipment from residential water heaters, furnaces, and cooking equipment to commercial and industrial boilers, heaters, diesel back-up engines, and furnaces to name a few. Some zero-emission technologies are further along in their development and commercialization than others. In addition, education and outreach will be a critical component of deploying zero-emission technologies to ensure the benefits, initial capital costs, operating costs, installation, and other differences associated with the zero-emission technology are well communicated to ensure the success of these newer cleaner technologies. It is envisioned that implementation of zero-emission technologies for stationary sources will be achieved through a combination of incentives and regulatory efforts.

Response to Comment 9-5, 9-6, and 9-7

See Response to Comment 1-259 regarding collaboration with the CSC and businesses to encourage incorporation of best management and "Good Neighbor" practices.

South Coast AQMD will collaborate and conduct outreach to encourage facilities to incorporate best management and "Good Neighbor" practices through the following CERP actions, where appropriate: 1) Chapter 5c, Action D: Outreach to Owners or Operators, 2) Chapter 5d, Action A: Identify Facilities of Concern, Chapter 5e, Action F: Outreach to Owners or Operators, and chapter 5f, Action I: Oil and Gas Industry Incentives. However, to ensure emission reduction measures such as best management practices, building enclosure requirements, housekeeping requirements, and monitoring requirements are properly implemented, a regulatory approach is more enforceable approach. Each of the provisions that are specified in a rule can be enforced upon and ensures the operator is properly implementing the provision to provide the greatest public health protection for the community. Additionally, Chapter 5c: Auto Body Shops Goal G: Rule Amendments and Chapter 5e: Metal Processing Facilities, Goals C: Identify Strategies and G: Metal Recycling Facilities have commitments regarding best management practices for auto body shops and metal processing facilities, respectively.

Many South Coast AQMD rules regulating metal toxic emissions have emissions standards, monitoring, reporting, recordkeeping, and emissions testing requirements. For rules regulating metal particulate emissions, these rules include building enclosure requirements, housekeeping, and best management practices. Through the rule development process, South Coast AQMD works with stakeholders to develop new and amend existing rules to incorporate provisions to minimize emissions. To further address this comment, the CERP includes Action C: Identify Strategies in Chapter 5e that commits to evaluate best management practices that are incorporated in South Coast AQMD rules regulating metal processing facilities. South Coast AQMD will amend rules that are lacking sufficient best management practices and will provide outreach materials to facilities about best management practices. Metal processing rules primarily focus on toxic air contaminant metal particulate which is a specific form of PM. The primary focus of toxic air contaminant metal particulate includes lead, hexavalent chromium, cadmium, nickel, and arsenic. These metal toxic air contaminants are the primary focus based on their toxicity and use.

Measures focusing on these metal toxic air contaminants will result in concurrent reductions of other metal toxic air contaminants that are far less toxic.

The CERP includes a suite of actions that further the goals of AB 617, going above and beyond the existing regulations in place, including rulemaking to amend six rules and assess nine rules for best management practices and initiating rule development if necessary (Table A8-7). Although CERPs in other communities also commit to adopting or amending the same rules, the SLA community co-leads, CSC, and community have suggested additional recommendations for rulemaking that are included in this CERP. Implementation of actions identified in other CERPs combined with the new actions identified specifically in the SLA CERP will provide meaningful emission reductions from a wide variety of pollutants. **Table A8-7** below provides a summary of proposed rulemaking efforts that are actions in the SLA CERP, the pollutants that the rulemakings will target, and actions that go beyond other AB 617 CERPs for communities within the Basin.

Table A8-7: SLA CERP Actions for Rule Amendments

South Coast AQMD Proposed or Proposed Amended Rule	Pollutants and CERP Chapter	Additional SLA Actions (Actions That Go Beyond Other AB 617 CERPs for Communities in the South Coast AQMD)
Proposed Amended Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene	Pollutants: VOC Chapter 5d: General Industrial Facilities	• Develop standard for new dry cleaning machines to minimize or eliminate VOC emissions
Proposed Amended Rule 1148.1 – Oil and Gas Production Wells	Pollutants: VOC, NOx, PM, Benzene, Toulene, Ethylbenzene, Xylene, Diesel Particulate Matter Chapter 5f: Oil and Gas Industry	• Requirements for injection wells • Explore limiting or eliminating use of odorants and chemicals used onsite (e.g., acid work) • Explore requirements for lower-emission or zero-emission equipment for on-site operations (e.g., assess feasibility to require cleaner engines)
Proposed Amended Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers	Pollutants: N/A (Notification and reporting rule) Chapter 5f: Oil and Gas Industry	• Expand well notifications • Notifications for injection wells • Notification of workover rig operations • Explore feasibility of additional notifications for active acid work and chemicals used on site (e.g., odorants, chemicals for drilling activities) • Notification of modifications to any previously noticed work
Proposed Amended Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations	Pollutants: VOC Chapter 5c: Auto Body Shops	• Include U.S. EPA best management practices as requirements for auto body shop

South Coast AQMD Proposed or Proposed Amended Rule	Pollutants and CERP Chapter	Additional SLA Actions (Actions That Go Beyond Other AB 617 CERPs for Communities in the South Coast AQMD)
Proposed Amended Rule 1171 – Solvent Cleaning Operations	Pollutants: VOC Chapter 5c: Auto Body Shops	• Include U.S. EPA best management practices as requirements for auto body shop
Proposed Rule 1460 – Control of Particulate Emissions from Metal Recycling and Shredding Operations	Pollutants: Metal particulate and fugitive dust Chapter 5e: Metal Processing Facilities	None
Regulation XIV rules regulating metal toxic air contaminants (Rules 1407, 1407.1, 1420, 1420.1, 1420.2, 1426, 1430, 1469, and 1469.1)	Pollutants: Arsenic, Cadmium, Chromium, Hexavalent Chromium, Lead, and Nickel Particulate Chapter 5e: Metal Processing Facilities	• Conduct an assessment of best management practices in South Coast AQMD metal processing rules • If rules regulating metal toxic air contaminants lack best management practices, initiate rulemaking to incorporate provisions for best management practices

Another part of the rule development process includes a cost-effectiveness calculation for rules regulating criteria pollutants to ensure that the proposed rule is cost-effective as required by BARCT. Cost-effectiveness is the total cost to achieve the standard over the emission reductions associated with the standard for a specific pollutant, for example $20,000 per ton of NOx reduced. For rules regulating toxic air contaminants, a cost-effectiveness analysis is not performed. South Coast AQMD seeks the most technically feasible option to minimize health risks for rules regulating toxic air contaminants. For all rules, cost impacts are evaluated and included in a socioeconomic impact analysis that evaluates the regional socioeconomic impacts of implementing a rule proposal. The Draft Socioeconomic Impact Analysis is provided to the public and the Governing Board 30 days before the public hearing for the proposed rulemaking. South Coast AQMD cannot pre-determine emission limits or other outcomes in the rulemaking process without first conducting these analyses.

Outside of these actions to reduce emissions in SLA, South Coast AQMD has a robust enforcement program. South Coast AQMD inspectors are trained to enforce all South Coast AQMD rules and permit conditions and respond to air quality complaints. The South Coast AQMD's compliance program ensures that rules and regulations are being properly implemented and operators are consistently adhering to the permit conditions which also ensures a level playing field for all regulated entities and to prevent unfair advantages for companies that choose not to comply with rules and permit conditions.

Enforcement activities are not conducted consistently across all industries and geographic areas throughout South Coast AQMD's jurisdiction. The frequency of regular inspections depends on the type of facility. For example, a chrome plating facility is inspected more frequently than an auto body shop. It is important to consider that there are approximately 110 chrome plating facilities in the South Coast Air Basin, compared to over 1,500 auto body facilities in the South Coast Air Basin. When considering limited resources, priority for inspections is typically given to higher risk pollution sources – that is, those facilities that emit the more toxic air pollutants and/or are close to schools, hospitals, and residential areas. Inspections are conducted as part of an inspector's regular assignments; however, there is not a specific number of inspections in which inspectors are required to conduct for a facility.

Public complaints are an integral part of the South Coast AQMD's overall compliance program. When the South Coast AQMD receives a public complaint, the complaints are assigned to inspectors for investigation, with priority for ongoing issues that are impacting the public.

Enforcement concerns raised by the CSC are captured in the CERP actions (**Table A8-8)** and will enhance compliance and enforcement activities in SLA moving forward. Additionally, outreach on how to file a complaint will help community members make the most effective use of the complaint process. The enforcement actions in this CERP ensure that compliance and enforcement concerns in SLA will be addressed throughout CERP implementation. Please see Chapter and Appendix 4: Enforcement Overview

Table A8-8: SLA CERP Actions for Enforcement

Chapter: Air Quality Priority	Goal	Action
5b: Mobile Sources	A: Warehouses and Idling	Idling inspection sweeps at locations of concern identified by the CSC
	C: CARB Enforcement	Compliance inspections of trucks and buses with input from the CSC on locations of concern
	E: Construction Sites Enforcement	Focused enforcement at construction sites of concern, as identified by the CSC, to evaluate compliance with CARB regulations
5c: Auto Body Shops	B: Identify Facilities of Concern	Auto body shop inspection sweeps, prioritizing CSC-identified locations, and taking enforcement action when appropriate
	F: Focused Facility Enforcement	Door-to-door focused enforcement of potential auto body shops in a CSC-identified area to ensure facilities are properly classified and to verify compliance with applicable rules and regulations
5d: General Industrial Facilities	C: Dry Cleaners	Enforcement of existing South Coast AQMD and CARB dry cleaning regulations

Chapter: Air Quality Priority	Goal	Action
	G: Construction Sites Enforcement	Focused enforcement at construction sites of concern to evaluate compliance with South Coast AQMD rules
5e: Metal Processing Facilities	A: CARB Regulations	Enforce CARB Chrome Plating ATCM through South Coast AQMD Rule 1469
5f: Oil and Gas Industry	G: CARB Regulations	Inspections of all CSC-identified oil and gas facilities of concern regarding CARB and South Coast AQMD rules

See Response to Comment 1-134 for NOx emission reductions from the RECLAIM transition.

For monitoring, see Response to Comments 1-248, 1-267, and 9-16. Additionally, Chapter 5c, Goal E: Air Measurement Surveys; Chapter 5d, Goal F: Air Measurement Surveys; Chapter 5e, Goal D: Air Measurement Surveys; and Chapter 5f: Oil and Gas Industry, Goals A: Air Measurement Surveys, B: Monitoring; and F: Support Community Scientists have commitments regarding additional air monitoring for auto body shops, general industrial facilities, metal processing facilities, and oil and gas facilities, respectively.

With respect to diesel sweepers, South Coast AQMD Rule 1186.1 – Less Polluting Sweepers requires certain public and private fleet operators to acquire and operate alternative-fuel or otherwise less-polluting sweepers when purchasing or leasing these vehicles for sweeping operations undertaken by or for governments or governmental agencies in the jurisdiction of the South Coast AQMD.

See Response to Comments 6-12, 6-18, 6-21, 6-23, and 9-2 regarding emission reductions from CERP actions and metrics.

This CERP provides the flexibility to expand on its actions as implementation moves forward. For example, “identify locations of concern” and “prioritize locations of concern” allow South Coast AQMD to work directly with the CSC to focus enforcement efforts on CSC-identified facilities of concern. As indicated in this CERP, any enforcement efforts related to CSC-identified concerns will be included in report-backs (e.g., inspections conducted, notices issued, complaints received).

South Coast AQMD takes enforcement action to the full extent of its authority under federal, state, and local law. Many air quality issues exist in environmental justice communities that are the result of land use and/or zoning decisions, legacy contamination, and other factors not directly related to air emissions. In fact, the agency places tremendous emphasis on historically

underserved communities and started doing so long before AB 617 was passed. Enforcement actions, however, do not immediately result in quantifiable pollution reductions. Instead, issuing violations and taking similar actions serve to deter facilities from violating air quality rules or permit conditions, which themselves often include or reflect emission reduction requirements. There are many facets to achieving pollution reductions, and this CERP attempts to utilize every tool at South Coast AQMD's disposal to achieve those reductions. If the CSC identifies a need for increased enforcement at any particular facility or site, South Coast AQMD is committed to conducting an investigation, including unannounced inspections, to evaluate compliance with all applicable air quality rules and regulations.

Chapter 4: Enforcement Overview and History describes the overall approach to enforcement by South Coast AQMD and CARB. In addition, this CERP includes focused enforcement actions. See also Goal A: Warehouses and Idling, Goal C: CARB Efforts, and Goal E: Construction Sites Enforcement in Chapter 5b: Mobile Sources; Goal B: Identify Facilities of Concern and Goal F: Focused Facility Enforcement in Chapter 5c: Auto Body Shops; Goal C: Dry Cleaners and Goal G: Construction Site Enforcement in Chapter 5d: General Industrial Facilities; Goal A: CARB Regulations in Chapter 5e: Metal Processing Facilities; and Goal G: CARB Regulations in Chapter 5f: Oil and Gas Industry.

Response to Comment 9-8

Throughout the CERP development process, information and data was provided to the CSC. All meeting agendas, presentations, and the CERP have been provided in English and Spanish. In addition, all CSC meetings had a Spanish translator to further facilitate communication with the community.

South Coast AQMD agrees that data transparency is essential to the success of this CERP. While South Coast AQMD has access to data it creates and stores, this does not mean that accessibility of data to the public is intentionally limited. Certain materials are not immediately available due to existing technological limitations, and other enforcement-related information is normally kept confidential during an investigation to ensure that a potential violator cannot hide its wrongdoing or destroy evidence. South Coast AQMD continually strives to improve public access to data though various online portals and through coordination with the CSC during scheduled report-backs, at which point the CSC can provide feedback and request additional information.

See Response to Comment 1-271 regarding how to obtain public information about South Coast AQMD regulated facilities. See Response to Comment 6-20 on information regarding updates to the F.I.N.D. Tool. See Response to Comments 1-280 and 1-281 for information on air monitoring data. See Response to Comment 1-241 regarding enforcement activity updates.

Response to Comment 9-9

Chapter 4: Enforcement Overview and History describes the overall approach to enforcement by South Coast AQMD and CARB. In addition, this CERP includes focused enforcement actions. See also Goal A: Warehouses and Idling, Goal C: CARB Efforts, and Goal E: Construction Sites Enforcement in Chapter 5b: Mobile Sources; Goal B: Identify Facilities of Concern and Goal F: Focused Facility Enforcement in Chapter 5c: Auto Body Shops; Goal C: Dry Cleaners and Goal G: Construction Site Enforcement in Chapter 5d: General Industrial Facilities; Goal A: CARB Regulations in Chapter 5e: Metal Processing Facilities; and Goal G: CARB Regulations in Chapter 5f: Oil and Gas Industry.

In particular, Chapter 5c: Auto Body Shops includes Goal F: Focused Facility Enforcement that commits to conduct door-to-door focused enforcement of potential auto body shops in a CSC identified area to ensure facilities are properly classified and to verify compliance with applicable rules and regulations. Auto body shops are a hard to reach industry. South Coast AQMD will be conducting compliance sweeps and will provide updates to the CSC. These enforcement efforts will be ground truthing and it is expected that the door-to-door focused enforcement approach will identify auto body shops that are not currently in the South Coast AQMD's permitting system. South Coast AQMD will consider any and all input provided by the CSC through its ground truthing efforts which can provide important guidance for proactive investigations of facilities, sites, and other sources. It should be noted that if the community is concerned about a business that is non-compliant, any person can notify the South Coast AQMD through the same process of filing an air quality complaint.

Details on reporting an air pollution complaint and South Coast AQMD's process of responding to complaints is detailed in Chapter 4. Additionally, Goal E: F.I.N.D. Tool and Filing Complaints in Chapter 5d includes an action to conduct community outreach on training to file air quality complaints by phone, web, or mobile application. Implementation of this action may assist in addressing the CSC's concerns with compliance and enforcement gaps. Furthermore, South Coast AQMD released a new version of the South Coast AQMD mobile application, which allows users to directly file and track complaints on a mobile device.

Response to Comment 9-10

South Coast AQMD's website includes several web-based applications that provide information about specific subject matter; however, F.I.N.D. makes the data available in a more consolidated way to provide a "one-stop" location for finding facility information. The information in F.I.N.D. comes from the South Coast AQMD enterprise database and updates are made to this data at least once per week. Although there are limitations to F.I.N.D., knowing how to navigate F.I.N.D. will yield the most effective results. Therefore, South Coast AQMD will conduct training on F.I.N.D as this training is a resource tool for the community to obtain information about South Coast AQMD regulated facilities. Additionally, South Coast AQMD is developing help materials and video tutorials to make F.I.N.D. more accessible and user-friendly, and to highlight existing features such as searching for facilities by industry type and AB 617 community. South Coast AQMD will work with the CSC to ensure that the training materials for F.I.N.D. are user friendly. See also Response to Comment 6-20 regarding updates to F.I.N.D.

Response to Comment 9-11

See Response to Comment 1-91. Additionally, South Coast AQMD does not have the expertise to establish health metrics. There may be opportunities throughout CERP implementation for health clinics and health professionals to support the implementation process (e.g., Chapter 5b, Goal B: Reduce Exposure at Schools, work with local school districts and CSC to support community projects that reduce students' exposure to air pollution; and Chapter 5e, Goal E: Emissions Data, provide informational handout or presentation which includes an overview on criteria pollutants and toxics that may be found in the community).

Response to Comment 9-12

Language is added to Goal E: Rule Amendment and Feasibility in Chapter 5f to include exploring the feasibility of requirements for injection wells and acid work as part of the rule development process for the South Coast AQMD Rule 1148 Series.

Response to Comment 9-13

See Response to Comment 9-4.

A provision has been added in Chapter 5f Goal E for rule development of the South Coast AQMD Rule 1148 Series that commits to evaluating during the rulemaking a requirement for operators to use the cleanest available equipment when conducting well activities. The focus will be on zero-emission technologies; however, zero-emission technologies may not be available for all equipment.

Response to Comment 9-14

Language is added to Goal E in Chapter 5f to include exploring limiting or eliminating the use of odorants and chemicals onsite as part of the rule development process for the South Coast AQMD Rule 1148 Series.

Response to Comment 9-15

The primary monitoring strategy for oil and gas well and other air monitoring priorities in SLA is survey monitoring, followed by fixed monitoring (to better characterize the source(s) of interest, if necessary). South Coast AQMD will consider conducting targeted monitoring when the schedule of some of the activities listed in this comment are known and South Coast AQMD has reason to believe that those activities may negatively impact air quality in the community.

Response to Comment 9-16

The goals and objectives of the CAMP are to provide air quality information in support of the CERP actions which include some monitoring of oil and gas operations. Additionally, language is added to Goal E to explore requirements for improved leak detection and repair (LDAR), which may include on-site air monitoring equipment, as part of the rule development process for the South Coast AQMD Rule 1148 Series.

Response to Comment 9-17

Language in Chapter 5f Goal H: Other Governmental Agency Projects is updated to include prohibitions of new oil wells and oil phase out as an example of collaborations with other agencies. South Coast AQMD commits to working with the relevant governmental agencies to identify opportunities for other agencies to provide information regarding their authority and projects related to the oil and gas industry.

Response to Comment 9-18

Report backs by South Coast AQMD will inform the CSC of inspections and compliance efforts at high-profile facilities and other sources of concern prioritized by the CSC. Chapter 5f, Action D: Enforcement Updates, includes the following action: provide periodic summaries of findings from enforcement activities, such as whether odors or emissions were confirmed or verified with complainants and at a specific site or source and any enforcement action taken. Details on reporting an air pollution complaint and South Coast AQMD's process of responding to complaints is detailed in Chapter 4.

Response to Comment 9-19

Goal E: F.I.N.D. Tool and Filing Complaints in Chapter 5d includes an action to conduct community outreach on training to file air quality complaints by phone, web, or mobile application. Implementation of this action may assist in addressing the CSC's concerns with compliance and enforcement gaps. Furthermore, South Coast AQMD released a new version of the South Coast AQMD mobile application, which allows users to directly file and track complaints on a mobile device. South Coast AQMD will also provide updates to the community on improvements or enhancements made to the system, as well as

report on enforcement actions at facilities and other sources identified as being of concern to the community. Report backs by South Coast AQMD will inform the CSC of inspections and compliance efforts at high-profile facilities and other sources of concern prioritized by the CSC.

Response to Comment 9-20

An action is added to Chapter 5d Goal C: Dry Cleaners to initiate the amendment of South Coast AQMD Rule 1102 to consider new standards reflecting zero-emissions technologies for new dry cleaning systems. Utilizing BACT to require operators to eliminate the usage of certain technologies is not the appropriate implementation of BACT. BACT is specific to a technology and establishes the cleanest standard for that technology. Therefore, establishing a standard for new dry cleaners to eliminate the use of certain technologies is more appropriate implemented through a regulatory approach. See also Response to Comment 1-232.

Response to Comment 9-21

As of December 31, 2020, the use of PERC dry cleaning systems is prohibited by South Coast AQMD Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems. Under this prohibition, no person can legally operate a PERC dry cleaning system within the jurisdiction of the South Coast AQMD including in South Los Angeles.

Chapter 5d, Action C includes identifying incentive opportunities to transition dry cleaners to community-identified alternatives. If the CSC decides to allocate incentive funds to switch dry cleaners from hydrocarbons-based solvents to zero-emission alternatives such as professional wet cleaning systems, South Coast AQMD will work to identify all possible sources of funding, including any residual funding that may be available from CARB through their Non-Toxic Dry Cleaning Incentive Program (AB 998). However, it is important to note that the AB 998 program was established by the California Legislature to provide financial incentives to dry cleaners within the State to transition from dry cleaning systems using PERC, an identified toxic air contaminant and potential human carcinogen, to non-toxic and non-smog forming systems. Therefore, even if there is remaining funding available in the AB 998 program; there may be a need for legislative change to switch those funds to incentivizes for the transition of solvent-based dry cleaning to professional wet cleaning systems. South Coast AQMD will work with the CSC, CARB, and other stakeholders to identify sources of funding, and explore the development and implementation of a new professional wet cleaning incentive program.

Response to Comment 9-22

See Response to Comments 1-242a and 1-242c and 242d.

Response to Comment 9-23

Chapter 5b, Goal A: Warehouses and Idling, commits South Coast AQMD to annually updating the CSC on South Coast AQMD Rule 2305 implementation and enforcement. The first annual compliance reports from warehouses will be submitted by January 31, 2023 and South Coast AQMD will provide an update to the CSC by the third quarter of 2023.

Per South Coast AQMD Rule 2305, warehouse operators are required to annually report the number of trucks that visit their facility every year, as well as their use of other equipment like yard tractors. South Coast AQMD is currently reviewing trade secret and confidentiality claims by industry to determine what compliance information can be made available to the public. South Coast AQMD is currently preparing for a third working group meeting to develop an approach for making warehouse ISR data publicly accessible

via the existing Facility Information Detail (F.I.N.D.) online tool on South Coast AQMD's website. Slides from working group one are available here: http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/find-presentation-1.pdf, and slides from working group two are available here: http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/find-presentation-wg-2_v11-12rev-vt.pdf.

Response to Comment 9-24

A new Goal: Rule Amendments has been added to Chapter 5c, which commits South Coast AQMD to initiate the process to amend South Coast AQMD Rules 1151 and 1171 to consider including U.S. EPA best management practices as requirements for auto body shops.

Response to Comment 9-25

A new Goal: Auto Body Shops Incentives has been added to Chapter 5c, which commits South Coast AQMD explore opportunities for incentive funds to incentivize use of low-VOC paint and coatings and water-based cleaners.

Response to Comment 9-26

South Coast AQMD Rule 1407 was recently amended in October 2019. The requirements of the rule incorporate best practices, including approved cleaning methods while minimizing fugitive dust emissions consisting of wet wash, wet mop, damp cloth, low pressure spray, or vacuum equipped with filter(s) rated by the manufacturer to achieve a 99.97% control efficiency for 0.3 micron particles. Rule 1407 also has emissions limits for arsenic, cadmium, and nickel; a facility has many options to comply with the emissions limits, including installing air pollution control devices. Rule 1407 does not have monitoring requirements, but does have periodic source testing requirements for arsenic, cadmium, and nickel and emission control device monitoring to ensure air pollution control equipment, if required, is properly maintained and operated.

South Coast AQMD Rule 1420 was recently amended in December 2017. The requirements of the rule include ambient and point source emissions limits, monitoring and source testing, and housekeeping requirements. To comply with the point source limits, the facility is required to vent emissions to an emission control device in order to meet the requirement. Rule 1420 requires monitoring under certain circumstances (e.g., two failed source tests over a 36-month period, the facility is thought to exceed 0.150 $\mu g/m^3$ averaged over 30 days). For housekeeping requirements, cleaning needs to be conducted in a manner that does not generate fugitive lead-dust (e.g., wet wash, wet mop, wet vacuum, wet scrub, dust suppressant) and specifically prohibits dry sweeping or use of compressed air.

An action was added to Chapter 5e, Goal C to conduct an assessment of best management practices in South Coast AQMD metal processing rules. If rules regulating metal toxic air contaminants lack best management practices, initiate rulemaking to incorporate provisions for best management practices. The assessment will cover South Coast AQMD Rules 1407, 1407.1, 1420, 1420.1, 1420.2, 1426, 1430, 1469, and 1469.1.

Currently, there are two rules that require ambient monitoring: Rule 1420.1 for large lead-acid battery recycling facilities and Rule 1420.2 for lead metal melting facilities. Ambient monitoring for lead from these large lead processing facilities is required to ensure the Basin remains in attainment with the National Ambient Air Quality Standard (NAAQS) for lead. Ambient monitoring of metal toxic air contaminants, particularly hexavalent chromium, can be expensive. South Coast AQMD believes it is a

better use of resources to require all other metal processing facilities to install pollution controls, implement building enclosures, housekeeping, and best management practices and conduct periodic source tests with parameter monitoring of pollution controls, and only require facilities that have a significant health risk to conduct ambient monitoring. South Coast AQMD Rule 1480 – Ambient Monitoring and Sampling of Metal Toxic Air Contaminants requires ambient monitoring if a facility has been designated as a potentially high risk level facility, where there is a significant health risk, and meets specified criteria.

Response to Comment 9-27

See Response to Comment 1-251.

Response to Comment 9-28

Chapter 5e has several actions that could apply to reducing particulate matter from metal recycling facilities: 1) Action C: based on CSC identifed facilities, identify potential strategies and approaches to address the CSC identifed concerns (e.g., incentive opportunities for businesses to incorporate best management practices); 2) Action F: collaborate with communities and businesses to encourage incorporation of best management practices; and 3) Action G: initiate rule development process for South Coast AQMD Proposed Rule 1460 to address housekeeping and best management practices at metal recycling facilities.

South Coast AQMD Rules 1166 and 1466 regulate soils contaminated with VOCs or TACs, respectively, which are enforced directly by South Coast AQMD. DTSC, water boards, and other regulatory agencies often directly cite these regulations in their clean-up plans. In general, South Coast AQMD does not have jurisdiction over soil contamination.

Response to Comment 9-29

See Response to Comment 6-19.

Response to Comment 9-30

An action was added to Chapter 5e, Goal C to conduct an assessment of best management practices in South Coast AQMD metal processing rules. If rules regulating metal toxic air contaminants lack best management practices, initiate rulemaking to incorporate provisions for best management practices. The assessment will cover South Coast AQMD Rules 1407, 1407.1, 1420, 1420.1, 1420.2, 1426, 1430, 1469, and 1469.1. Also see Response to Comments 9-5, 9-6, and 9-7 regarding "Good Neighbor" and best management practices.

Response to Comment 9-31

South Coast AQMD is committed to enforcing CARB's "No Idling" regulation through coordination with CARB on posting of "No Idling Signs," conducting idling truck sweeps, and responding to public complaints. South Coast AQMD welcomes the opportunity to meet and discuss the CSC's concerns with compliance gaps or issues with the regulation and potential solutions.

See Response to Comment 1-189 for information regarding South Coast AQMD and CARB's efforts to enforce mobile source regulations.

Response to Comment 9-32

See Response to Comment 9-4.

Although the proposed statewide measures listed in Chapter 5a, Table 5a-3 "Estimated Emissions Reduction Targets for CARB Statewide Measures" are not specific to SLA, they are statewide measures and will benefit SLA. Additionally, Chapter 5b is specifically focused on reducing emissions and exposure to mobile sources in SLA. This air quality priority includes five goals with corresponding actions such as focused inspections, installation of "No Idling" signs, installation of air filtration systems at schools, support for community projects that reduce student exposure, exploration of incentive funds for cleaner mobile source technologies, and conduct outreach.

Additionally, see Response to Comment 1-200 regarding replacing diesel public school buses. See Response to Comment 1-208a regarding incentive funding for cleaner mobile source technologies. See Response to Comment 1-208c regarding Replace your Ride program which encourages scrapping and replacing an older vehicle with an advanced technology vehicle. See Response to Comment 9-5, 9-6, and 9-7 regarding the Clean Fuels Policy that included a requirement to use clean fuels as part of BACT and LAER and diesel sweepers.

Response to Comment 9-33

See Response to Comment 9-1 regarding development of the CERP, including air quality priorities. See Response to Comment 9-2 regarding the SLA CERP and emissions reductions.

Response to Comment 9-34

See Response to Comment 9-1.

Comment Letter #10 – South Los Angeles Co-Leads

Martha Dina Arguello and Paula Torrado Plazas, Physicians for Social Responsibility-Los Angeles (PSR-LA); Gina Charusombat, Strategic Concepts in Organizing and Policy Education (SCOPE); Jacquelyn Badejo and Linda Cleveland, Watts Clean Air and Energy Committee (WCAEC)

April 28th, 2022

Wayne Nastri
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

RE: Assembly Bill 617 South LA Community Steering Committee Concerns Regarding Co-leadership Model and Community Emission Reduction Plan

Dear Mr. Wayne Nastri,

We are writing to express our grave concerns regarding the process and implementation of Assembly Bill 617 ("AB 617") in the community of South Los Angeles ("South LA"). On February 25th, 2021 the California Air Resources Board ("CARB") selected South LA as an AB 617 community to start the development of both a Community Emissions Reduction Plan ("CERP") and a Community Air Monitoring Plan ("CAMP"). The South LA community was thrilled with this announcement and was eager to finally address local air pollution by elevating the needs and concerns of frontline communities. AB 617, as touted by CARB staff and Board members, was established as a community-based framework to improve air quality and reduce exposure to toxic air pollutants in California communities most impacted by air pollution and was intended to be an innovative community designed and driven process.

The unfortunate reality is that many AB 617 communities throughout the state, but the South LA Community Steering Committee ("CSC") in particular, have experienced the contrary. Instead of a community centered process, the South Coast Air Quality Management District ("SCAQMD") has continuously ignored South LA CSC's sensible ideas to reduce pollution burdens in our communities. In fact, as of the date of this letter, the Draft South LA CERP contains absolutely no *new* emissions reductions measures that can be attributed to AB 617. As one CARB Board member has stated, "there is nothing like this program on planet Earth," but the South LA CSC would like to share the reality of those working on this program from a community experience. Our main concerns are regarding the process of AB 617 and the substance of the South LA CERP are included below.

10-1

I. The SCAQMD failed to deliver an authentic and meaningful community led process.

Despite being one of few AB 617 communities to have a co-leadership model, the SCAQMD has failed to give co-leads the space to meaningfully work in a collaborative fashion. Physicians for Social Responsibility-LA (PSR-LA), Strategic Concepts in Organizing and Policy Education (SCOPE), and Watts Clean Air and Energy Committee (Watts Clean Air) are the community based and environmental justice organizations co-leading the AB 617 South LA CSC in collaboration with SCAQMD. The co-leadership model was developed to ensure the process

for identifying air quality priorities and emissions reduction strategies was grounded in the community. A major barrier to achieving meaningful community engagement in this process is the time constraints due to the fast-paced timeline for the development and approval of the CERP and CAMP. The continued impacts of the pandemic on community engagement, zoom fatigue, onboarding a facilitator later in the process, the pause SCAQMD took to reground the process, among other factors continue to contribute to a delayed CERP and CAMP development for South LA. The idea for the co-leadership model stems from the lessons learned from other AB 617 communities, where Air Districts dictated processes and outcomes, leaving CSC's with a CERP that did not feel representative of community priorities. 10-2 10-3

However, while there were barriers that SCAQMD and co-leads had to overcome due to external forces, co-leads also faced resistance from SCAQMD that were entirely within the agency's control. Co-leads experienced this resistance when asked to be involved in the development and writing of the early stages of the CERP. The CERP is arguably the most significant aspect of AB 617, and co-leads and the South LA CSC were entirely left out of the CERP development writing process as described below. 10-4

To be clear, community engagement is not one isolated aspect of AB 617, a phase in an agency's scope of work, or a checkmark an agency can just write off. Authentic and meaningful community engagement needs to be a task in all phases of AB 617—it is a practice that begins at ideation and is not completed until the end of implementation. 10-5

A. Constrained Timeline and Lack of Capacity

From the outset of the AB 617 implementation in South LA, we have learned how SCAQMD's bureaucratic processes continue to trump meaningful community engagement initiatives when addressing community needs and developing solutions. As co-leaders, we have stepped up for the South LA community to ensure there is equitable representation, transparency, and accountability in the program implementation. From February 2021, the co-leaders have been working on a weekly basis with SCAQMD and committed numerous hours to engaging in agenda setting meetings, planning, organizing, conducting community outreach, and serving as strategy partners to guide the AB 617 South LA CSC. The AB 617 work has come at the expense of stretching our community based organizations' capacity and overwhelmed staff as we are rushing to complete a CERP and a CAMP by the AB 617 deadlines. We supported the timeline extension to complete the CERP because the co-leads wanted to ensure we had the adequate time to develop a CERP that reflects our community's vision, however, the Draft CERP and the process that led to its creation was does not align with South LA CSC's priorities and vision. 10-6

B. Communications and Process Transparency

We have learned that transparency, open dialogue, and accountability are key to ensure all co-leaders are heard and their input is equitably reflected in the decision making. Nonetheless, that can not happen without first building trust and strengthening relationships between the co-leaders and the air districts. Through the process, we continue to face instances where the 10-7

co-leads are at a disadvantaged position when it comes to accessing materials that are key to help guide the CSC. Though we are part of the development process and materials are shared with the co-leaders, we feel as though because of the bureaucratic centered process by which the air district must abide by, such as having their legal team and other departments approve meeting notes, presentations, and CERP actions language and drafts, the co-leaders are put in a disempowered and disengaged position. SCAQMD engages in a delayed action process requiring different levels of approval that has led to distributed materials to the CSC that are barely approved by the co-leaders. As the co-leaders, we should have approval power, but this delayed engaging practice with the district disbalances the power dynamic. Sharing these crucial documents late in the process with the co-leads, prevents the co-leds meaningful engagement to assess and respond accordingly.

For instance, the South LA CSC participated in a series of meetings defining measures and actions for each of the air quality priorities to be included in the CERP. The co-leads continuously asked SCAQMD if we could work on various CERP chapters alongside staff, to ensure that the South LA CSC's priorities were included. However, despite numerous requests to participate in the CERP development process, SCAQMD denied our requests and waited until March 1st, 2022 to share a version of the CERP with the co-leads. SCAQMD's refusal to allow our participation was antithetical to the spirit of AB 617 that calls for a community driven and designed process. In fact, SCAQMD only shared the Draft CERP with the co-leads a few days before it became available to the general public, and to the entire South LA CSC at the same time when it was published on the website. To make matters worse, we were then given only two weeks to respond to a Draft CERP of over 100 pages. While co-leads certainly could not take on the weight of writing the entire CERP due to capacity constraints, it was necessary to have the co-leads engage earlier in the writing process to ensure that we were more effective and collaborative as we discussed the CERP with the South LA CSC. As co-leads, we should not be in a position where we are just commenting and sending input, we should be engaged in a co-design process and not one where we co-lead from the sidelines.

10-7 cont.

At the time, co-leads knew SCAQMD was undergoing this separate CERP writing process, even though we argued with the district that the co-leads had to be part of the writing process as well. Once the draft CERP was presented to the co-leads, we shockingly found that:

- The co-leads work for the entire year on the South LA AB617 implementation was completely erased from the CERP narrative.
- The CERP narrative did not reflect all of the historical and foundational work the co-leads have led in South LA, more importantly the work we have led through our Community Air Protection Grant.
- The CERP narrative of South LA was vague and not reflective of the CSC work.
- The CERP actions were vague and not reflective of what the CSC had advocated.

10-8

II. The Draft CERP ignores South LA CSC's vision and lacks emissions reduction strategies.

PSR LA Physicians for Social Responsibility Los Angeles

WATTS CLEAN AIR & ENERGY COMMITTEE

SCOPE STRATEGIC COMMUNITY AGENDA

As a result of a failed community engagement process, it is unsurprising that the Draft CERP, as currently drafted, is not representative of community concerns or priorities. The South LA CSC identified sources of pollution and other environmental hazards that are not included in the Draft CERP. In addition, the Draft CERP does not study or attempt to address the background or regional sources of pollution that all South LA communities face. The Draft CERP also fails to address the burdens that residents of South LA shoulder because of poverty, lack of economic and educational opportunities, illegal dumping, and excessive noise, all of which contribute to the community's cumulative air pollution burden. 10-9 10-10 10-11

To support our broader vision to improve air quality at the pace and with the urgency needed, the actions we demand to see in the South LA CERP include but are not limited to the following:

- Require BACT/BARCT implementation for all industries throughout the permitting process,
- Phase out chemical usage in industrial operations and enforce BACT for chemical substitutions with the least harmful alternatives and safer cleaner technologies that will protect health; 10-12
- Require installation of zero emissions equipment when feasible and zero emissions fleet for industrial operations;
- Prohibit the use of fossil fuels/diesel power generation for all industries and provide access to incentives for implementation of cleaner energy technologies; 10-13
- Require implementation of good neighborhood agreements and businesses/industries best practices to reduce emissions such as emissions entrapment technologies or requiring equipment locations to be trapped on-site to reduce communities exposure, diesel sweepers, and mandatory monitoring on site. 10-14

In addition, below is a sector by sector list of recommendations the South LA CSC would like included or strengthen in the CERP.

Oil and Gas:

- Create new rule amendment to SCAQMD rules 1148.1 and 1148.2 to include injections well in public notifications, ban chemical odorants in acid work, and add mandatory public notices for when acid works are done. 10-15
- Mandate the electrification of all equipment used in Oil and Gas operations including the use of diesel trucks;
- Ban fossil fuels/diesel power generation and electrify diesel workover rigs; 10-16
- Mandate the replacement of on-site polluting/dirty equipment (eg diesel-powered) with less polluting/greener alternatives;
- Ban the use of chemicals odorants at Oil and Gas operations; 10-17

- Conduct frequent and responsive targeted monitoring for defined Oil Well activities including flaring, odors, stimulation, noise and acid work; 10-18
- Mandate air monitoring equipment on site for Oil and Gas operations that detects methane and VOC leaks to ensure compliance and support enforcement and inspections processes; 10-19
- Support the Oil and Gas wells phase-out efforts of the City of LA and LA County by creating collaborations with those agencies; 10-20
- Inform the community of inspections and compliance efforts. 10-21

General Industries (Dry Cleaners and Warehouses):

- Require the improvement of SCAQMD's reporting/complaints response systems for small stationary sources by conducting outreach and reporting enforcement actions regularly to the community. 10-22
- Create new rule amendment to SCAQMD rule 1102 to classify Professional Wet Cleaning as BACT in the permitting process for new dry cleaners, to ensure new dry cleaners use the safest cleanest alternative that reduce emissions and address legacy contamination 10-23
- Create a new incentive and support program to allow ALL dry cleaners to switch from PERC and hydrocarbons based solvents to Professional Wet Cleaning, including amendment of funding from AB998 to ensure fee includes hydrocarbons and can fund transition to PWC. 10-24
- Phase out existing non-perc dry clean solvent machines after useful life and remove regulatory exemptions for non-perc dry clean solvent machines 10-25
- Provide annual updates on the compliance of all warehouses with the Indirect Source Rule; provide information about on the daily trucks count and other diesel equipment used 10-26

Auto Body Shops:

- Develop a rule amendment to SCAQMD rules 1151 and 1171 to include EPA Auto body shops Best Practices as required BACT in the permitting process for auto body shops; 10-27
- Incentivize the implementation of best practices including the use of low VOCs coat paintings and use of water based cleaners and coatings to help reduce emissions at the source. 10-28

Metal Facilities:

- Require amendments of SCAQMD rules 1407 and 1420 to include best practices that can reduce emissions including integration of: 1) ride along wet sweeper, 2) stacks equipment to trap emissions on site, and 3) installation of monitors on site; 10-29

- Integrate new rulemaking to replace the use of Hexavalent chromium and applicability to South LA metal facilities; 10-30
- Review actions to reduce pollutants at the fenceline of metal recycling facilities. 10-31
- Collaborate with appropriate agencies to assess potential soil contamination in fenceline neighborhoods;
- Expand emissions reporting requirements to address gap between the many number of permitted metals facilities and the very few required to participate in AQMD's Annual Emissions Reporting (AER) program; 10-32
- Develop good neighbor policies between CSC members and metal facilities representatives to spearhead pilot projects of implementation of best practices to reduce emissions and community led solutions. 10-33

Mobile Sources:

- Address No Idling rules compliance gaps; 10-34
- Require and mandate zero emissions trucks for industries operations and provide incentives pathways for businesses to transition their operations fleet; 10-35

III. The Draft CERP fails to recognize principles, processes, and practices that shift from an extractive economy to a regenerative economy.

The South LA CERP is a key step towards ensuring a community vision for a Just Transition, clean production, and economic justice that addresses air pollution burdens and creates needed health protections. Just Transition prioritizes the needs of the most vulnerable communities, frontline and Black, Indigenous, and People of Color communities, and displaced workers, so that they benefit first from strategies and resources as we address the climate crisis through both mitigation and adaptation. This framework recognizes that confronting the legacy of environmental racism, environmental risks, and cumulative burden should not be viewed as merely a technical matter of switching energy sources, but also a social and economic shift that ushers in a cleaner, fairer city for all.[1] The transition itself must be just and equitable; redressing past harms and creating new relationships of power for the future through reparations. If the process of transition is not just, the outcome will never be. Just Transition describes both where we are going and how we get there." [2] 10-36

A. Transitioning to a Green Economy and Safe Alternatives

To effectively reduce harmful emissions in highly polluted communities through the implementation of AB 617, the South LA CSC is committed to working collaboratively with 10-37

[1]

[2] https://climatejusticealliance.org/just-transition/

SCAQMD to identify, require, incentivize, and implement regulations and innovative rules that can advance Best Available Control Technologies and emissions reduction technologies. A focus on specific industries of concern can support the development of best practices in emissions reduction strategies and innovative policies that would require the mandatory implementation of the cleanest, safest and least toxic emission control strategies to limit the proliferation of regrettable substitutions in frontline communities that are helping industries to move towards just transition and clean production. 10-37 cont.

We write this letter acknowledging that the South LA CERP is in its development stages and there is an opportunity for improvement. We would like to see SCAQMD engaging collaboratively with the co-leads and the CSC members to ensure all the measures and process improvement requests in this letter are implemented and addressed in the CERP. We are prepared to work collaboratively to ensure that AB 617 is delivered in South LA in a manner that recognizes community expertise and as envisioned by CARB Board. 10-38

For any further questions please feel free to reach out to Paula Torrado at ptorrado@psr-la.org

Sincerely,

South LA AB 617 Community Steering Committee Co-Leads

Martha Dina Arguello,
Executive Director,
Physicians for Social Responsibility- Los Angeles

Paula Torrado Plazas
Manager of Health and Environment Programs,
Physicians for Social Responsibility - Los Angeles

Gina Charusombat,
Policy and Research Associate
Strategic Concepts in Organizing and Policy Education

Jacquelyn Badejo,
Watts Clean Air and Energy Committee

Linda Cleveland,
Watts Clean Air and Energy Committee

Response to Comment 10-1

South Coast AQMD recognizes and appreciates the dedication of all of the community co-leads, CSC members, and community representatives to continuously work and collaborate to develop the CERP and CAMP through the challenges of the pandemic. To ensure a community-led process for the SLA community, a CSC was formed, and a co-lead model was used to gather community input and feedback to develop the CERP. In accordance with CARB's Blueprint, a CSC was established to guide the development of the program elements since this process "require[s] consistent and frequent engagement with [CSC] at all stages of the development process." A CSC member or community co-lead may act as a liaison for members of the public during CERP development to ensure their feedback was included throughout the process.

South Coast AQMD staff made numerous efforts to provide the community co-leads the space to meaningfully work in a collaborative fashion to develop the CERP. Integrated into the process were weekly meetings with the community co-leads where the community co-leads provided input and guidance on the agenda, the structure of the CSC meeting, identification of presenters, review of presentations before CSC meetings, concepts and ideas for CERP actions, and direct input into the CERP. The South Coast AQMD staff shares the sentiment of the community co-leads that the timeframe to develop the CERP is too compressed, even with the additional four months. South Coast AQMD would agree that more time would be helpful. The South Coast AQMD is a key supporter of Assembly Bill 1749 (C. Garcia) which would extend the allowable time for CERP development from one to two years.

The Final CERP incorporates many of the comments provided by the community co-leads and incorporates sections and chapters that were written by the community co-leads to ensure that the voice of the community co-leads is heard more directly. South Coast AQMD agrees and made revisions to the CERP to reflect that the process to develop the CERP was collaborative and was a partnership with the community co-leads. The community co-leads put in countless hours helping to develop measures, meet with staff, and influenced much of that was incorporated into the Final CERP.

Many of the recommendations made by the community co-leads, CSC, and community are incorporated into this CERP. Although there are measures that are similar to measures in the other five South Coast AQMD AB 617 communities, the community co-leads, CSC, and community have identified actions that are unique and go further than actions in other AB 617 CERPs (e.g., actions for oil and gas for evaluating odorants, notifications for injection wells, new commitments for establishing standards for new dry cleaning systems). This CERP incorporates the unique approaches that were based on concepts from the community co-leads, such as evaluation of best management practices for metal processing facilities and education on zero emission technologies at time of permitting. In addition, the community co-leads authored portions such as Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads and Chapter 2c: Just Transition as Presented by the Community Co-Leads, which is unique to the SLA CERP. These chapters were written by the community co-leads and provides historical background information on environmental justice issues experienced in SLA and provides a discussion of the importance for a just transition to zero emissions and the need for cleaner air for a community that is burdened with a variety of socioeconomic and environmental issues.

Since January 2021, more than 80 community meetings were held to develop the SLA CERP. These meetings included 16 CSC meetings, approximately 60 meetings with the community co-leads (including weekly meetings), CAMP and CERP workshop, eight Monitoring Working Team meetings, two virtual office

hours, and one in-person meet and greet. CSC meetings are on Facebook Live, recorded and are available on the AB 617 webpage (http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la) to ensure the community voice is captured. In addition to the CSC meetings, South Coast AQMD also held one-on-one meetings with residents, community leaders, and stakeholders to enhance community participation and input in the development of the CERP and CAMP. For CSC meetings, the community co-leads helped plan meeting agendas and discussion activities in order to facilitate meaningful engagements with the CSC. The community co-leads also reviewed presentations prior to the CSC meetings. South Coast AQMD also incorporated input from 10 comment letters received from community co-leads, CSC members, community-based organizations, and residents during the comment period from of March 3, 2022 to April 28, 2022 into the Final CERP. The original comment period lasted from March 3, 2022 to March 17, 2022, and South Coast AQMD extended the comment period by six weeks to allow for additional comment letters. South Coast AQMD has worked collaboratively with the CSC and community co-leads throughout CERP and CAMP development.

Additional information on the community-led process can be found in the Executive Summary, Chapter 1: Introduction, Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads, and Chapter 3 and Appendix 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process. Chapter 5a: Introduction to Actions to Reduce Community Air Pollution, section "Emission Reduction Targets" contains information regarding emission reduction targets of this CERP. Actions written in each of the Chapter 5 subchapters will result in emission and/or exposure reductions from the air quality priority sources; CERP actions include the following strategies: rules and regulations, incentives, outreach, enforcement, and monitoring. These strategies will result in emission reductions; however, emission reductions from some strategies cannot be quantified at this time. See Response to Comment 6-12 for emission reductions from CERP actions and metrics.

Response to Comment 10-2

California Health and Safety Code, Section 44391.2 (b) requires air districts to adopt a community emissions reduction program within one year of the community designation. When the community co-leads and CSC members expressed concerns with this timeframe, South Coast AQMD acknowledged the compressed timeline of the AB 617 statutory requirements and jointly, with the community co-leads and CSC members, requested an extension from CARB. The request was granted and allowed the CERP adoption deadline to be extended from February 2022 to June 2022. The request letter and response from CARB can be found at: http://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/south-la. This additional time has allowed for more meaningful engagement and discussion with the community co-leads and CSC to further develop the CERP and community air monitoring plan (CAMP). CSC input is incorporated throughout the CERP development and into the Final CERP. South Coast AQMD agrees that additional time is needed to allow staff to engage with the community at a more reasonable pace for development of the CERP. South Coast AQMD has been a key supporter of Assembly Bill 1749 (C. Garcia) which if signed into law, would extend the allowable time for CERP development from one to two years.

Response to Comment 10-3

The community co-leads and South Coast AQMD discussed the challenges of meeting virtually and that in-person interactions provide greater opportunities to connect and communicate. However, due to the COVID-19 pandemic and in an abundance of caution, meeting virtually provided a viable platform to initiate and maintain meaningful interactions with the CSC members. Although there were some

perceived disadvantages of virtual meetings, one advantage is that the virtual meeting format allows access to CSC meetings for community members who would otherwise would not have been able to attend in-person meetings. Additionally, by continuing to meet virtually, South Coast AQMD was able to ensure the ongoing development of the CERP occurred with the CSC and community co-leads. After hearing CSC and South Coast AQMD staff input, in October 2021, South Coast AQMD paused the AB 617 program to reassess the program based on lessons learned and to seek input from designated communities on best practices for improving program effectiveness. During the pause, one weekly community co-lead meeting was cancelled. During that approximately 30-day timeframe, South Coast AQMD continued to evaluate comments received and to prepare for the November 2021 CSC meeting.

As mentioned above, in December 2021, South Coast AQMD along with the community co-leads and CSC members requested an extension from CARB. The CERP adoption deadline was extended from February 2022 to June 2022 and provided additional time for meaningful engagement, discussion, and CERP development and review. South Coast AQMD appreciates the work and dedication that the community co-leads and CSC have put forth in order to meet virtually and develop the CERP and CAMP. The SLA CERP development process included over 80 meetings. Additionally, a number of one-on-one meetings have been held with CSC members in order to enhance community understanding, expand participation opportunities and create more comfortable spaces for input to the development of this CERP.

See Response to Comment 10-1 regarding the community co-lead model. The community co-lead model was developed based on the strong representation of the community co-leads within the SLA community. Each AB 617 designated community is unique, and a range of models (e.g., co-host, facilitator, community co-lead) are utilized for CERP development. South Coast AQMD worked collaboratively with the CSC in each of the respective AB 617 designated communities to develop CERPs that incorporate the community's air quality concerns of key importance and actions to address these priorities.

Additionally, a professional facilitator, Castillo Consulting Partners (CCP), supported CSC meetings and weekly community co-lead meetings to promote equity with the South Coast AQMD and the community. The facilitators' role is to moderate the conversation during meetings, keep the agenda on-track, build consensus, ensure everyone has the opportunity to participate, and maintain a positive meeting environment among all participants. CCP took a community driven approach to enhance ongoing participation and diverse perspectives from CSC members to develop the CERP for SLA. CCP prioritizes facilitating dialogue and shared decision-making between CSC members and South Coast AQMD as the group moves through the development process with the approach to ensure accountability of South Coast AQMD and community partners. CPP has a contractual agreement with South Coast AQMD and is compensated for their facilitator services at CSC meetings and meetings with the community co-leads.

Response to Comment 10-4

South Coast AQMD worked with the community co-leads on the framework of the CERP since January 2021. The community co-leads provided comments at CSC, subcommittee, weekly meetings, and Monitoring Working Team meetings which informed the actions and the overall development of this CERP. South Coast AQMD acknowledges that the process has been challenging due to many factors, such as the need for census building in utilizing the co-lead model for the first time, but South Coast AQMD worked collaboratively with the community co-leads throughout the development of the CERP. Beginning in March 2021, South Coast AQMD and the community co-leads had weekly recurring meetings which provided South Coast AQMD the opportunity to better understand community members' perspective,

have deeper discussions of issues to ensure that measures in the CERP reflect community concerns, and to seek their guidance in ensuring a community driven approach for CSC engagement in developing the CERP.

The community co-leads and South Coast AQMD were also joined by CARB meeting with us on a regular basis to discuss the AB 617 process at South Coast AQMD. Early in the process, the community co-leads proactively committed to review previously adopted South Coast AQMD CERPS. In June 2021, South Coast AQMD requested that the community co-leads provide feedback regarding the framework and content of these CERPs as applicable to SLA CERP.

From September 2021 through February 2022, the community co-leads and South Coast AQMD held subcommittee and CSC meetings focused on discussing the CSC identified air quality priorities and actions to address their priorities. In these meetings, examples of actions, including language, were presented to the community co-leads and CSC for feedback and input was captured by South Coast AQMD. During this process, the community co-leads expressed concern with the workload for CERP development and requested a Preliminary Draft CERP. As part of the CERP development, South Coast AQMD wanted to have the community voice represented and requested that the community co-leads draft the community profile section. Recognizing the workload of the community co-leads, South Coast AQMD provided a draft document to serve as a starting point. South Coast AQMD developed a Preliminary Draft CERP based on community co-lead and CSC feedback, input, and comments from the CSC, subcommittee, and weekly community co-lead meetings. The Preliminary Draft CERP was released in March 2022, with a public comment period from March 3, 2022 to March 17, 2022 and was extended to April 28, 2022 to allow for additional feedback. Ten comment letters were received, including an extensive comment letter from the community co-leads (Comment Letter 1) providing examples of CERPs (e.g., West Oakland's Community Action Plan), draft language, and proposed actions for the SLA CERP. Based on the written comments received, South Coast AQMD incorporated feedback, suggested language, and graphics, where feasible, from the community co-leads into the Revised Draft CERP. Although the community co-leads raised concern for the lack of inclusion "in writing of the early stages of the CERP," South Coast AQMD has incorporated much of the feedback provided by the community co-leads and CSC. Additionally, South Coast AQMD scheduled additional meetings with the community co-leads to specifically discuss details of their comment letter. The community co-leads played a key role in providing input that shaped the CERP to reflect and address the CSC's concerns.

Response to Comment 10-5

South Coast AQMD's continual dedication to meaningful community engagement for the development and implementation of this CERP and throughout the AB 617 program is noted in the Executive Summary, Chapter 3: Community Outreach, Community Steering Committee, Community Engagement, and Public Process, and Chapter 5a: Introduction to Actions to Reduce Community Air Pollution. See also Response to Comments 1-166, 1-175, and 8-2 for South Coast AQMD's community engagement during implementation of this CERP.

Response to Comment 10-6

South Coast AQMD appreciates and acknowledges the work and dedication of the community co-leads to develop the CERP and meet the statutory requirements of AB 617. South Coast AQMD incorporated, where feasible, co-lead feedback into the Final CERP.

Response to Comment 10-7

As outlined in the CARB Blueprint, South Coast AQMD staff collaborated with the SLA CSC to establish a charter to outline the committee process and structure. South Coast AQMD works expeditiously to develop and release materials (e.g., presentations) to the community co-leads and the CSC to meet the timeline referenced in the SLA Charter. The SLA Charter outlines releasing meeting materials at least 48 hours or the day prior to the meeting. After the charter was established, the community co-leads requested to see materials and approve content for each meeting prior to CSC distribution. To provide transparency and ensure a community-led process, the weekly community co-lead meetings were used to discuss future meeting materials and preview meeting materials, where feasible, and still adhering to South Coast AQMD's policy and procedure for releasing materials to the public.

In addition to those meetings, South Coast AQMD participated in a second series of regular meetings with the community co-leads following the release of the Preliminary Draft CERP to be transparent and discuss the concerns addressed in Comment Letter #1 – South Los Angeles Community Co-Leads and incorporated their edits and comments or revised the language as appropriate throughout the CERP.

See Response to Comment 10-4 for community co-lead's request to write the CERP chapters.

Response to Comment 10-8

See Response to Comment 10-4 for community co-lead's request to write the CERP chapters.

The proposed language in Comment Letter #1 regarding the work of the community co-leads with respect to SLA's AB 617 designation and CERP development is included, with edits, in Chapter 2b: Community Profile and CERP Development as Presented by the Community Co-Leads. (Disclaimer: The views and opinions expressed in Chapter 2b are those of the SLA community co-leads and/or community and do not necessarily reflect the views or positions of South Coast AQMD).

South Coast AQMD considered the comment letters and verbal comments on the Preliminary Draft CERP and revised the CERP to be better characterize and reflect of the work conducted by the CSC and community co-leads in Chapter 2a: Community Profile. Additionally, South Coast AQMD revised the proposed actions language to incorporate the concerns and requests advocated for by the CSC and community co-leads.

Response to Comment 10-9

The CSC identified sources of pollution (e.g., airplane exhaust) and other environmental hazards (e.g., worker exposure, noise pollution, illegal dumping, hazardous waste disposal, soil and water contamination, chemical cargo transported on trains) that are not directly related to air quality or are outside of the purview of the South Coast AQMD's authority.

Noise violations and illegal dumping are under the City and/or County Code Enforcement and/or Waste Management. The U.S. EPA sets emissions standards and the Federal Aviation Administration sets and administers certification requirements for aircrafts and engines. More information on aircraft emissions authority can be found here: https://www.faa.gov/about/office_org/headquarters_offices/apl/noise_emissions/certifications#:~:text=The%20EPA%20sets%20the%20Emissions,from%20setting%20their%20own%20standards. Chemical cargo transported on trains is under the authority of the Federal Railroad Administration, where the Hazardous Materials Division administers a safety program to oversee the movement of hazardous

materials. More information on the Hazardous Materials Division can be found here: https://railroads.dot.gov/divisions/hazardous-materials/hazardous-materials#:~:text=Under%20authority%20delegated%20to%20FRA,the%20Nation's%20rail%20transportation%20system%2C. Soil contamination and hazardous waste disposal falls under the authority of the Department of Toxic Substances Control.

The CSC also mentioned fireworks as an air quality concern, but it was not chosen as an air quality priority. South Coast AQMD conducts air monitoring and analysis to assess the PM levels and metal content during Independence Day fireworks annually. More information on South Coast AQMD's data reports and assessments can be found in Appendix 5d.

Although some of the CSC concerns are not directly air quality related or are outside the purview of the South Coast AQMD authority, language is included in Chapter 5B: Mobile Sources, Chapter 5c: Auto Body Shops, 5d: General Industrial Facilities, and 5f: Oil and Gas Industry to make referrals to agencies (e.g., Cal/OSHA) that have the authority to address these concerns (e.g., worker safety). Language was also added to Chapter 2b, Section "Environmental Issues Outside of Scope of the CERP" and Appendix 5d: General Industrial Facilities, subsection "Other Government Agencies and their Authority" to capture these community concerns, the appropriate responsible agency, and their respective authority.

Response to Comment 10-10

The source attribution presented in Chapter 2d: Emissions and Source Attribution and Appendix 2d: Source Attribution quantifies the emissions from within the community and does not address the sources outside the community that would contribute to the background reaching the SLA community. Contribution from outside sources was not part of the scope of the source attribution report. All CERPs are focused on local sources of air pollution that operate within that community boundary.

Response to Comment 10-11

The SLA community was selected as an AB 617 community based on several factors, including its CalEnviroScreen 3.0 score. CalEnviroScreen data includes public health, social, and economic factors in SLA. More information about regarding CalEnviroScreen, including CalEnviroScreen data, can be found in Chapter 2d and Appendix 2a: Community Profile. Maps containing CalEnviroScreen data capturing SLA's disproportionate burden are included in Figure 2d-2 of Chapter 2d "Overall CalEnviroScreen 4.0 Score Percentile for the Basin" and Figure A2a-2 "CalEnviroScreen 4.0 Map of SLA" of Appendix 2a: Community Profile.

Response to Comment 10-12

See Response to Comments 9-3 and 1-232.

Response to Comment 10-13

See Response to Comment 9-4 and 9-32.

Response to Comment 10-14

See Response to Comment 9-5, 9-6, and 9-7.

Response to Comment 10-15

See Response to Comment 9-12.

Response to Comment 10-16
See Response to Comment 9-4.

Response to Comment 10-17
See Response to Comment 9-14.

Response to Comment 10-18
See Response to Comment 9-15.

Response to Comment 10-19
See Response to Comment 9-16.

Response to Comment 10-20
See Response to Comment 9-17.

Response to Comment 10-21
See Response to Comment 9-18.

Response to Comment 10-22
See Response to Comment 9-19.

Response to Comment 10-23
See Response to Comment 1-232.

Response to Comment 10-24
See Response to Comment 9-21.

Response to Comment 10-25
See Response to Comments 1-242a and 1-242c and 242d.

Response to Comment 10-26
See Response to Comment 9-23.

Response to Comment 10-27
See Response to Comment 9-24.

Response to Comment 10-28
See Response to Comment 9-25.

Response to Comment 10-29
See Response to Comment 9-26.

Response to Comment 10-30
See Response to Comment 9-27.

Response to Comment 10-31
See Response to Comment 9-28.

Response to Comment 10-32
See Response to Comment 6-19.

Response to Comment 10-33

See Response to Comment 1-259.

Response to Comment 10-34

Actions in Chapter 5b, Goal A: Warehouses and Idling and Goal C: CARB Efforts will provide more focused enforcement at CSC-identified locations for truck idling sweeps. Also, please see Response to Comment 9-31.

Response to Comment 10-35

See Response to Comment 9-4 and 9-32.

Response to Comment 10-36

South Coast AQMD is committed to fulfilling the requirements of AB 617 as outlined by the statutory requirements and CARB's Blueprint. South Coast AQMD is also committed to working collaboratively with the SLA CSC and community co-leads to implement the CERP actions to reduce the emissions and exposure to emissions identified by the community as air quality priorities. Our goals are similar to and consistent with those of SLA. South Coast AQMD supports the transition from fossil fuels to zero emissions. Further, it is our objective to facilitate and implement this process in a way that will not adversely impact or burden disadvantaged communities, as set out in our 2022 AQMP.

Response to Comment 10-37

South Coast AQMD looks forward to continue working with the SLA CSC and community co-leads during CERP implementation**.** This CERP outlines goals and actions to address the CSC-identified air quality priorities. These actions will include requirements (e.g., rules and regulations, focused enforcement) and incentives (e.g., school air filtration, cleaner mobile source technologies), and will implement strategies (e.g., outreach, monitoring) to reduce emissions and exposures from the air quality priorities. South Coast AQMD is committed to implementing BACT, BARCT, and other emission reduction strategies that have been conducted through the proper determination processes and/or rule development. See Response to Comments 9-3 and 1-232.

Response to Comment 10-38

South Coast AQMD appreciates the time the community co-leads have dedicated throughout the CERP development process and through the development of the comment letters submitted. Appendix 8 provides a point-by-point response describing the considerations taken to include or not include the requests made. South Coast AQMD is committed to continuing to work collaboratively with the SLA CSC and community co-leads during CERP implementation.

Appendix 9

Acronyms

List of Acronyms

Acronym	Definition
µg/m^3	Micrograms per Cubic Meter
AB 2588	Assembly Bill 2588 (Air Toxics "Hot Spots")
AB 617	Assembly Bill 617
ACTM	Advanced Clean Truck Measure
ADT	Average Daily Trips
AER	Annual Emissions Reporting
AQIP	Air Quality Investment Program
AQMP	Air Quality Management Plan
AQ-SPEC	Air Quality Sensor Performance Evaluation Center
ATCM	Airborne Toxic Control Measure
AVR	Average Vehicle Ridership
BACT	Best Available Control Technology
BARCT	Best Available Retrofit Control Technology
BC	Black Carbon
BIA	Bureau of Indian Affairs
BMP	Best Management Practice
BNSF	Burlington Northern Santa Fe
BWT	Budget Working Team
CAA	Clean Air Act
CCAEJ	Center for Community Action and Environmental Justice
CalGEM	California Geologic Energy Management Division
CAMP	Community Air Monitoring Plan
CAPCOA	Community Air Pollution Control Officers Association
CAPES	Clean Air Program for Elementary Students
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CCP	Castillo Consulting Partners
CCR	California Code of Regulations
CDWR	California Department of Water Resources
CEC	California Energy Commission
CE-CERT	College of Engineering-Center for Environmental Research and Technology
CEMS	Continuous Emissions Monitoring Systems
CEQA	California Environmental Quality Act
CEQA IGR	California Environmental Quality Act Intergovernmental Review
CERP	Community Emissions Reduction Plan
CHE	Cargo Handling Equipment
CNG	Compressed Natural Gas
CNRA	California Natural Resource Agency
CO	Carbon Monoxide

Acronym	Definition
CO2	Carbon Dioxide
COGR	California Oil and Gas Regulation
CPUC	California Public Utilities Commission
CSC	Community Steering Committee
CTR	Criteria Pollutant and Toxics Emissions Reporting
CUPA	Certified Unified Program Agencies
DAC	Disadvantaged Community
DMV	Department of Motor Vehicles
DOE	Department of Energy
DOT	Department of Transportation
DPH	Department of Public Health
DPM	Diesel Particulate Matter
DPR	Department of Pesticide Regulation
DTSC	Department of Toxic Substances Control
EC	Elemental Carbon
ECV	Eastern Coachella Valley
ED	Department of Education
EDVS	Enforcement Data Visualization System
EF	Emission Factor
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EJ	Environmental Justice
ELABHWC	East Los Angeles, Boyle Heights, West Commerce
EMFAC	EMission FACtor
EPA	Environmental Protection Agency
ERC	Emission Reduction Credit
EV	Electric Vehicle
F.I.N.D.	Facility INformation Detail
FBMSM	Facility-Based Mobile Sources Measure
FY	Fiscal Year
GGRF	Greenhouse Gas Reduction Fund
GHG	Greenhouse Gas
H&S	Health and Safety
HAP	Hazardous Air Pollutant
HP	Horsepower
HRA	Health Risk Assessment
HVAC	Heating, Ventilation, and Air Conditioning
IID	Imperial Irrigation District
ISR	Indirect Source Rule
LADWP	Los Angeles Department of Water and Power
lbs/day	Pounds per Day
LDAR	Leak Detection and Repair

Acronym	Definition
LEV	Low Emission Vehicle
LIC	Low-Income Community
LNG	Liquefied Natural Gas
MATES	Multiple Air Toxics Exposure Study
MERV	Minimum Efficiency Reporting Value
MND	Mitigated Negative Declaration
MOA/MOU	Memorandum of Agreement / Memorandum of Understanding
MSERCs	Mobile Source Emission Reduction Credits
MSRC	Mobile Source (Air Pollution Reduction) Review Committee
MWT	Monitoring Working Team
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industrial Classification Codes
NATTS	National Air Toxics Trends Station
NC	Notice to Comply
ND	Negative Declaration
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NGO	Non-Governmental Organization
NGV	Natural Gas Vehicle
NOA	Notice of Availability
NOP	Notice of Preparation
NOV	Notice of Violation
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
NZEV	Near-Zero Emission Vehicle
O3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
OWT	Outreach Working Team
PAMS	Photochemical Assessment Monitoring Stations
PAR	Proposed Amended Rule
PERC	Perchloroethylene
PERP	Portable Off-Road Equipment Registration Program
PEV	Plug-In Electric Vehicle
PHEV	Plug-In Hybrid Electric Vehicle
PM10	Particulate Matter less than or equal to10 microns (Course PM)
PM2.5	Particulate Matter less than or equal to 2.5 microns (Fine PM)
PPB	Parts per Billion
PPM	Parts per Million
PR	Proposed Rule
PSR-LA	Physicians for Social Responsibility - Los Angeles
RECLAIM	Regional CLean Air Incentives Market

Acronym	Definition
RFP	Request for Proposals
RFQ	Request for Quotations
RFQQ	Request for Qualifications and Quotations
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
SAJE	Strategic Actions for a Just Economy
SBM	San Bernardino, Muscoy
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCE	Southern California Edison
SCLA-PUSH	South Central Los Angeles Project to Understand the Sources and Health Impacts of Local Air Pollution
SCOPE	Strategic Concepts in Organizing and Policy Education
SELA	Southeast Los Angeles
SEP	Supplemental Environmental Project
SIP	State Implementation Plan
SLA	South Los Angeles
SOON	Surplus Off-Road Opt-In for NOx
SORE	Small Off-Road Engine
South Coast AQMD	South Coast Air Quality Management District
SOx	Sulfur Oxides
SSA	Salton Sea Authority
SSAB	Salton Sea Air Basin
SSMP	Salton Sea Management Plan
STAND-LA	Standing Together Against Neighborhood Drilling-LA
SULEV	Super Ultra Low Emission Vehicle
TAC	Toxic Air Contaminant
TAG	Technical Advisory Group
TCM	Transportation Control Measure
TOG	Total Organic Gases
TPD	Tons per Day
TPY	Tons per Year
TRU	Transportation Refrigeration Unit
TS-Code	Technical Specialty Code
TSP	Total Suspended Particulate
U.S. EPA	United States Environmental Protection Agency
UFP	Ultrafine Particles
ULEV	Ultra Low Emission Vehicle
UP	Union Pacific
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound

Acronym	Definition
WAIRE	Warehouse Actions and Investments to Reduce Emissions
WCAEC	Watts Clean Air and Energy Committee
WCWLB	Wilmington, Carson, West Long Beach
WHAM	Why Healthy Air Matters
ZEV	Zero Emission Vehicle

ATTACHMENT C

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SUBJECT: **NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

PROJECT TITLE: **SOUTH LOS ANGELES COMMUNITY EMISSIONS REDUCTION PLAN PER ASSEMBLY BILL 617**

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (South Coast AQMD), as Lead Agency, has prepared a Notice of Exemption pursuant to CEQA Guidelines Section 15062 – Notice of Exemption for the project identified above.

If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Notice of Exemption, will also be electronically filed with the State Clearinghouse of the Governor's Office of Planning and Research for posting on their CEQA Net Web Portal which may be accessed via the following weblink: https://ceqanet.opr.ca.gov/search/recent. In addition, the Notice of Exemption will be electronically posted on the South Coast AQMD's webpage which can be accessed via the following weblink: http://www.aqmd.gov/nav/about/public-notices/ceqa-notices/notices-of-exemption/noe---year-2022.

NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

To: County Clerks for the Counties of Los Angeles, Orange, Riverside, and San Bernardino; and Governor's Office of Planning and Research - State Clearinghouse

From: South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Project Title: South Los Angeles Community Emissions Reduction Plan per Assembly Bill 617

Project Location: The proposed project will occur in a portion of the South Coast Air Quality Management District (South Coast AQMD) jurisdiction located in the South Los Angeles (SLA) community in Los Angeles County which includes the following areas in whole or in part: Adams-Normandie, Athens, Baldwin Park, Broadway-Manchester, Central-Alameda, Chesterfield Square, Compton, Crenshaw, Exposition Park, Florence, Gramercy Park, Historic South-Central, Jefferson Park, Leimert Park, Lynwood, Manchester Square, South Park, Vermont Square, Watts, West Adams, the unincorporated areas of Willowbrook and Westmont, and parts of Inglewood and Los Angeles.

Description of Nature, Purpose, and Beneficiaries of Project: Assembly Bill (AB) 617, signed into state law in 2017 (see Health and Safety Code Section 44391.2), requires air districts to prepare a Community Emissions Reduction Plan (CERP) for environmental justice communities selected by the California Air Resources Board (CARB). CERPs provide a blueprint for achieving reductions of air pollution emissions and exposure within selected communities and are tailored to address each community's air quality priorities. The SLA community was selected by CARB to prepare a CERP in February 2021. The purpose of this project is to implement a CERP for the SLA community per AB 617. The beneficiary of the project is the identified community and the nearby areas, but the entire region within South Coast AQMD's jurisdiction will also benefit. The SLA CERP includes actions to reduce emissions and/or exposures to toxic air contaminants and criteria air pollutants, an implementation schedule, an enforcement plan, and a description of the process and outreach conducted to develop the CERP. Implementation of the SLA CERP actions is expected to occur over five years beginning in 2022. A summary of the action items by category is described below.

Mobile Sources: 1) Provide outreach to warehouses regarding South Coast AQMD Rule 2305; 2) Explore opportunities to make Rule 2305 reports available on South Coast AQMD's online F.I.N.D. tool; 3) Report on Rule 2305 implementation and enforcement in the community; 4) Conduct focused inspections, including idling sweeps, and initiate enforcement, as needed, at Community Steering Committee (CSC)-identified locations, such as warehouses and construction sites; 5) Provide outreach to the community regarding CARB mobile source regulations, best management practices, how to file a complaint, and incentive programs; 6) Conduct an activity or solicit input through the CSC's contacts in the community to collect feedback on CARB's complaint filing system; 7) Install "No Idling" signs at CSC-identified locations; 8) Explore incentive funding opportunities for cleaner mobile source technologies and provide outreach to the CSC when funding is available; 9) Install air filtration systems in schools that meet a Minimum Efficiency Reporting Value (MERV) 16, where technically feasible; 10) Provide outreach to the CSC when new funding opportunities are available to install school air filtration systems; 11)Work with local school districts and CSC members to identify and prioritize schools that may benefit from the installation of air filtration systems in order to reduce exposure to air pollution, especially mobile source emissions; 12) Work with local school districts and CSC members to identify support for community projects (e.g., Safer Routes to Schools program); and 13) Work with local city or county agencies to identify strategies to address the CSC's concerns with designated truck routes.

Auto Body Shops: 1) Provide education and outreach to CSC members and owners and operators of auto body shops about how South Coast AQMD and partner agencies regulate auto body shops; 2) Identify and prioritize locations of concern and conduct initial air measurement surveys near facilities of concern to identify and characterize any potential emissions and install fixed or stationary monitors if recommended; and 3) Conduct focused inspection sweeps of auto body shops in CSC-identified locations and take enforcement action when appropriate; 4) Provide periodic summaries of findings from inspection and enforcement activities (i.e., whether odors or emissions were confirmed and verified with complainants during inspections, and whether any enforcement actions were required and taken; 5) Collaborate with and make enforcement referrals to the appropriate agency(ies) when inspections conducted by South Coast AQMD personnel identify potential compliance issues which are not within South Coast AQMD's jurisdictional authority; 6) Provide outreach to CSC-identified locations to encourage incorporation of best management and "Good Neighbor" practices; 7) Explore feasibility to amend South Coast AQMD Rules 1151 and 1171 to include best management practices from the United States Environmental Protection Agency as requirements for auto body shops; and 8) Explore incentive funding opportunities for low-VOC paints and coatings, and water-based cleaners and provide outreach to the CSC when funding is available.

General Industrial Facilities: 1) Prioritize facilities of concern, identify applicable South Coast AQMD rules, provide three years of compliance history, summarize air pollution emission data from the facilities and from areas monitored near the facilities, and identify potential emission reduction measures, if appropriate; 2) Conduct inspections of dry cleaners and enforcement of South Coast AQMD and CARB regulations; 3) Initiate rule development process to amend South Coast AQMD Rule 1102 to consider establishing a new emission standard reflecting zero-emission technologies for new dry cleaning systems and identify incentive opportunities to transition to community-identified alternatives for dry cleaning technologies (e.g., South Coast AQMD Rule 1102); 4) Provide education and outreach to owners/operators of dry cleaners and new permit applicants of dry cleaning facilities about incentive opportunities and cleaner alternative technologies, and seek feedback from owners or operators regarding their willingness to transition to and/or need of support to transition to community-identified alternatives; 5) Conduct outreach and training for the SLA community on how to use the South Coast AQMD's online F.I.N.D. tool and procedures for making air quality-related complaints; 6) Conduct initial air measurement surveys near facilities of concern to identify and characterize any potential emissions and install fixed or stationary monitors if recommended; 7) Collaborate with CSC to improve outreach to small businesses to encourage incorporation of best management and "Good Neighbor" practices; 8) Collaborate with and make enforcement referrals to the appropriate agency(ies) when inspections conducted by South Coast AQMD personnel identify potential compliance issues which are not within South Coast AQMD's jurisdictional authority; and 9) Conduct focused inspections of construction sites to evaluate compliance with South Coast AQMD regulations.

Metal Processing Facilities: 1) Identify all metal processing facilities, prioritize metals facilities of concern to the CSC located within the SLA community, identify the applicable South Coast AQMD rules and potential strategies to address concerns, provide three years of compliance history, summarize air pollution emission data at or near the facilities, and share this information with the SLA community; 2) Conduct initial air measurement surveys near facilities of concern to identify and characterize any potential emissions and emission reduction measures, if appropriate, and install fixed or stationary monitors if recommended; 3) Provide community outreach about criteria pollutants and toxics that may be found in the community (e.g., hexavalent chromium, lead, zinc, nitrogen oxides), Criteria Pollutant and Toxics Emissions Reporting (CTR) process, and CARB Chrome Plating Air Toxic Control Measure (ATCM) requirement; 4) Provide outreach to facility owners and operators about how South Coast AQMD and CARB regulate metal processing facilities and encourage best management and "Good Neighbor" practices; 5) Conduct an assessment to identify the South Coast AQMD metal processing rules which regulate metal toxic air contaminants but lack best management practices and initiate rule development process to amend these rules to incorporate provisions for best management practices; and 6) Initiate rule development process for Proposed Rule 1460 to address housekeeping and best management practices at metal recycling facilities to reduce fugitive emissions.

Oil and Gas Industry: 1) Prioritize locations of concern for siting air monitoring equipment; 2) Conduct air measurement surveys near and around oil drilling sites to characterize any potential emissions and install fixed or stationary monitors if recommended; 3) Provide periodic summaries of monitoring results and outreach on online tools and data available to the public; 4) Collaborate with appropriate agencies and CSC to determine if additional air monitoring is needed during specific well activities or under certain conditions; 5) Collaborate with and make enforcement referrals to the appropriate agency(ies) when inspections conducted by South Coast AQMD personnel identify potential compliance issues which are not within South Coast AQMD's jurisdictional authority and periodically provide summaries of findings from enforcement activities to CSC; 6) Identify opportunities for other agencies to provide information regarding their authority, existing and proposed rules, and/or projects and programs, involving the oil and gas industry; 7) Identify opportunities to support community scientists in their efforts to conduct community air monitoring; 8) Initiate rule development process to amend South Coast AQMD Rule 1148 Series to explore limiting or eliminating use of odorants and chemicals onsite and to consider including notification and other requirements pertaining to injection wells, active acid work, operation of workover rigs, use of odorants and chemicals onsite, improvement of leak detection and repair, modifications to any previous notifications, and lower-emission or zero-emission equipment for on-site operations; and 9) Explore incentive opportunities to support implementation of best management practices and/or installation of emission reduction technologies at oil and gas facilities, and conduct outreach to the CSC when opportunities are available.

Public Agency Approving Project:	**Agency Carrying Out Project:**
South Coast Air Quality Management District	South Coast Air Quality Management District

Exempt Status:
CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption
CEQA Guidelines Section 15262 – Feasibility and Planning Studies
CEQA Guidelines Section 15301 – Existing Facilities
CEQA Guidelines Section 15306 – Information Collection
CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment
CEQA Guidelines Section 15309 – Inspections
CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies

Reasons why project is exempt: South Coast AQMD, as Lead Agency, has reviewed the proposed project pursuant to: 1) CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Because implementing the various components of the proposed project (SLA CERP) would either not cause any physical changes (e.g., community outreach about South Coast AQMD rules, programs, and tools), or the physical changes that may occur as a result would only require minimal construction activities and cause negligible physical impacts (e.g., installing "No Idling" signs or air filtration systems), it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. Further, the proposed project is also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, because the overall purpose of the proposed project is to benefit the environment and health of residents of the SLA community and all the action items within the SLA CERP support this goal. The proposed project also contains action items involving feasibility and planning studies, which require information to be collected and examined to ascertain whether follow-up actions are needed without prescribing or committing to specific future actions. Thus, the action items involving feasibility or planning studies are statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15262 – Feasibility and Planning Studies, while action items involving the collection or exchange of information or data obtained from these studies are categorially exempt from CEQA pursuant to CEQA Guidelines Section 15306 – Information Collection. The SLA CERP contains some action items which may require minor physical modifications to existing structures or buildings, such as installing air filters or monitoring equipment, and these activities are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301 – Existing Facilities. The SLA CERP also contains some action items which involve inspections requiring performance or compliance checks and which may involve follow-up enforcement, and these activities are categorically exempt from CEQA pursuant to CEQA Guidelines Section 15309 – Inspections and CEQA Guidelines Section 15321 – Enforcement Actions by Regulatory Agencies. Finally, for the action items identified as categorically exempt there is no substantial evidence indicating that any of the exceptions to the categorical exemptions set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project. Therefore, the proposed project is exempt from CEQA.

Date When Project Will Be Considered for Approval (subject to change):
South Coast AQMD Governing Board Hearing: June 3, 2022

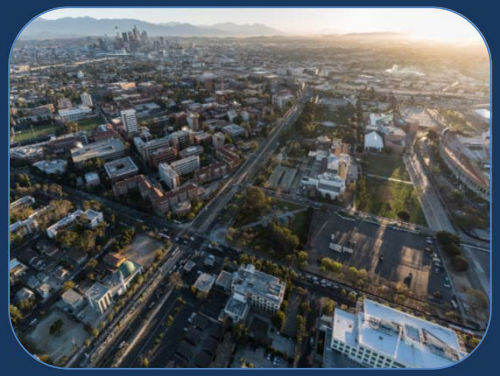
CEQA Contact Person:	**Phone Number:**	**Email:**	**Fax:**
Kevin Ni	(909) 396-2462	kni@aqmd.gov	(909) 396-3982
SLA CERP Contact Person:	**Phone Number:**	**Email:**	**Fax:**
Nicole Silva	(909) 396-3384	nsilva@aqmd.gov	(909) 396-3807

Date Received for Filing: _____ **Signature:** *(Signed Upon Board Approval)*

Barbara Radlein
Program Supervisor, CEQA
Planning, Rule Development, and Implementation

Attachment D

South Los Angeles
Community Emissions Reduction Plan

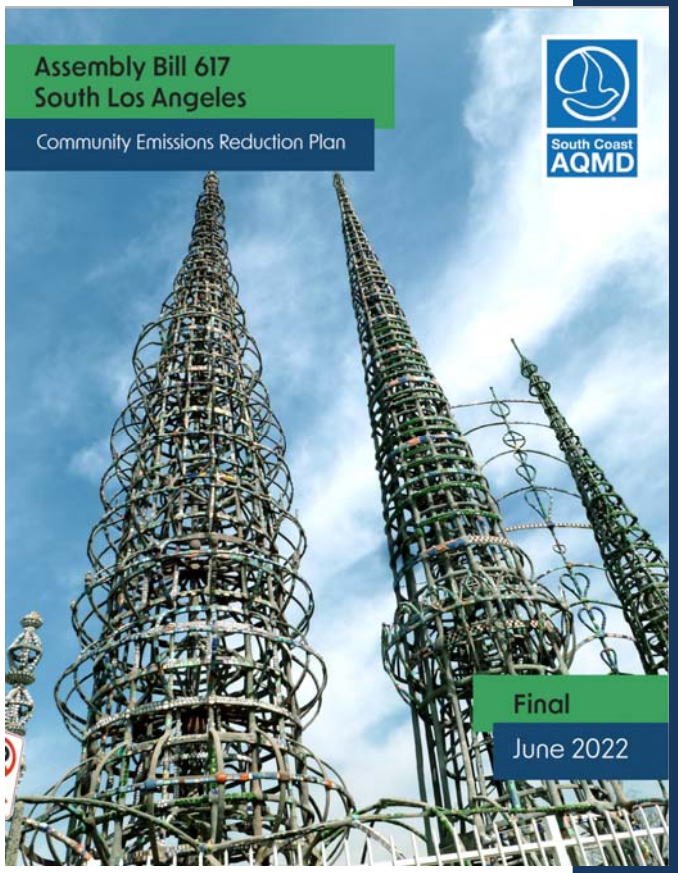


Public Hearing
June 3, 2022

South Coast AQMD

Background
AB 617 South Los Angeles Community Emissions Reduction Plan

- Community Emissions Reduction Program (CERP) is designed to:
  - Address air quality priorities set by the Community Steering Committee (CSC)
  - Establish emissions and exposure reduction goals
  - Identify strategies to achieve air quality priorities
- CERP is to be adopted by local air district one year from community selection
- CERP must focus on community air quality priorities and include:
  - Community profile
  - Enforcement plan
  - Strategies for implementing actions
  - Metrics to demonstrate achieving goals
  - Targets



CERP Development Timeline

Launch

January 2021 – May 2021

- Community kick-off meeting
- Designated by CARB (February 2021)
- Establish CSC
- Establish community boundary

Development

May 2021 – May 2022

- Identify air quality priorities
- Develop CERP and Community Air Monitoring Plan (CAMP)
- Extension for Draft CERP approved (March 2022)
- Stationary Source Committee (May 2022)

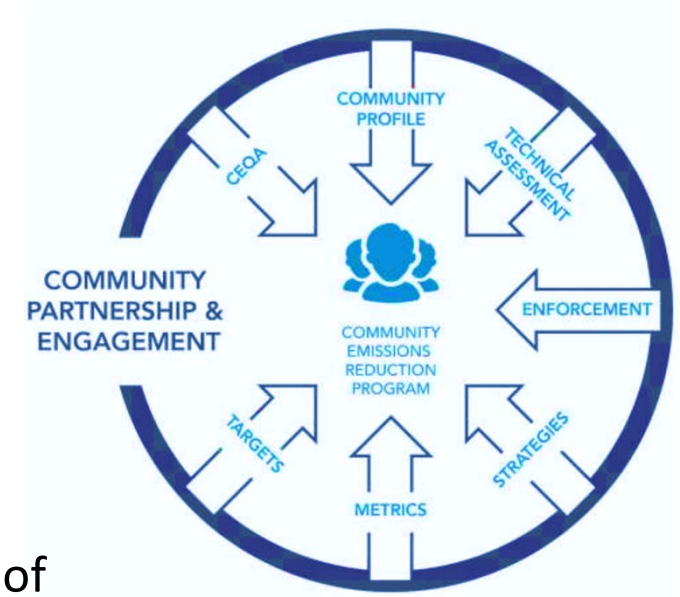
Implementation

June 2022 – 2027

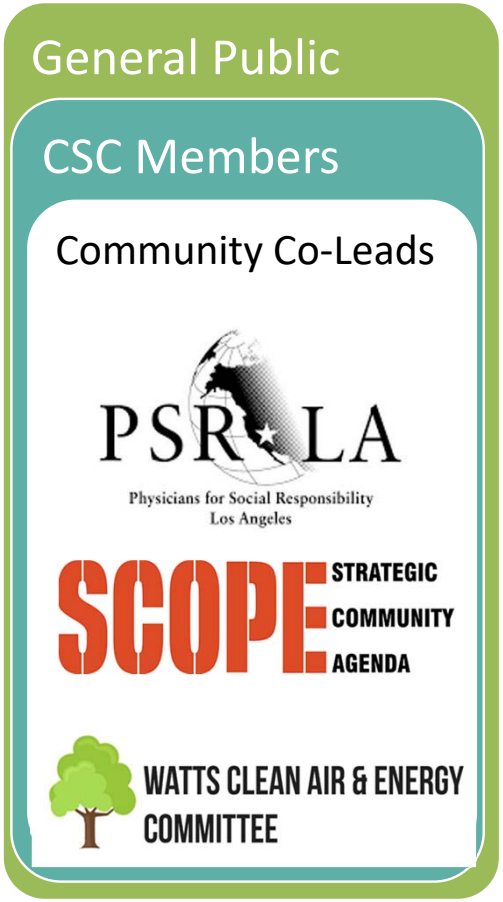
- Governing Board Meeting and finalize CAMP (June 2022)
- Submit CERP to CARB for approval
- CARB Board Meeting (August 2022)
- Implement CERP and CAMP (2022-2027)

About the SLA CERP Development Process

- Uniqueness of SLA CERP
  - All meetings were virtually due to COVID-19 – no in-person engagements
  - First community to use a community co-lead model
  - Meetings moderated using professional facilitator to
    - Ensure equal partnership in developing CERP
    - Maintain positive meeting environment
- In October 2021, South Coast AQMD paused the AB 617 program
- CARB granted a four-month extension at the request of South Coast AQMD, community co-leads, and CSC members

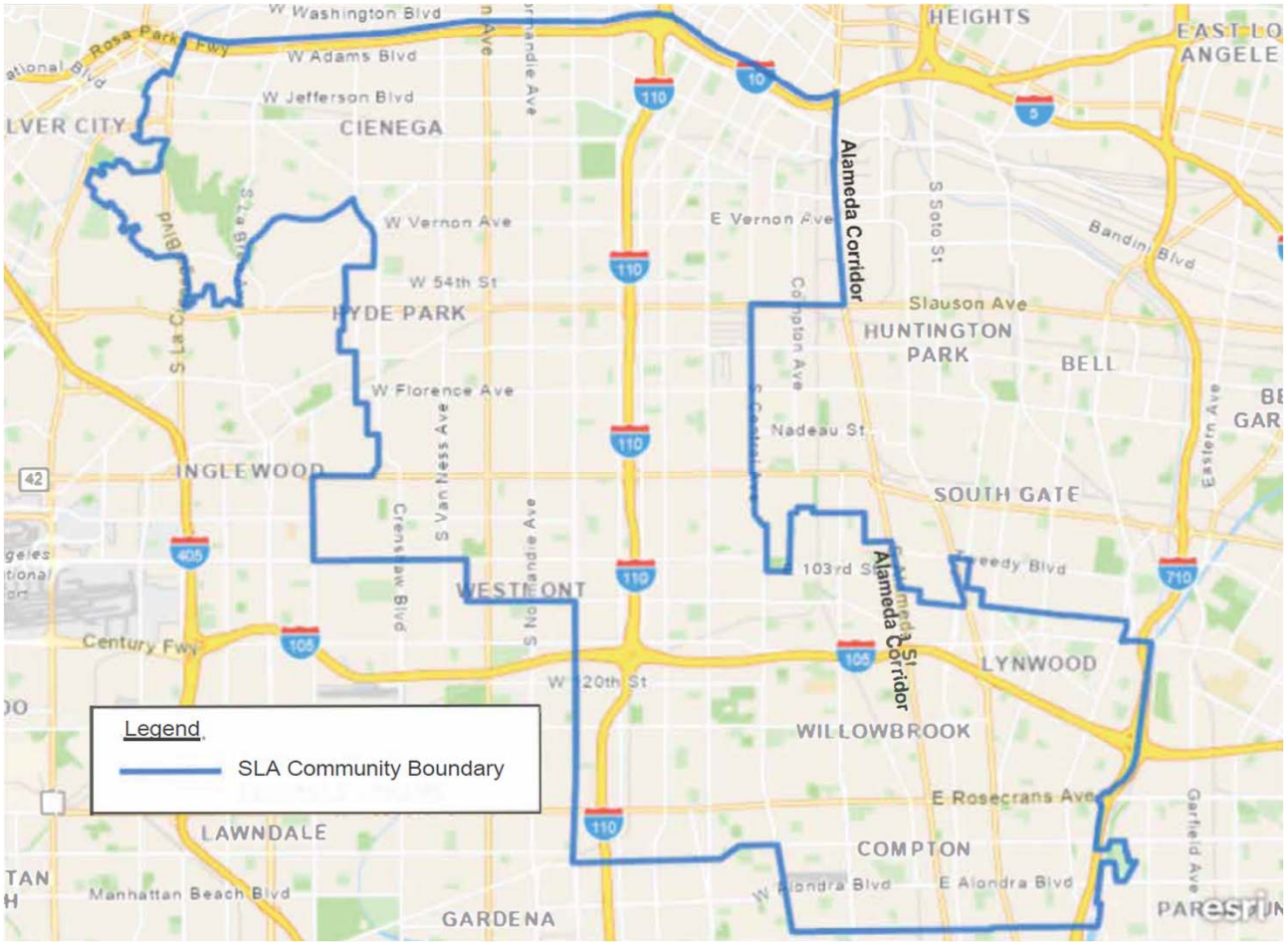


Community Co-Lead Model



- Community co-lead model ensured that CERP development and implementation is a community-driven process
- Responsibility of the community co-leads included:
  - Establishing the CSC
  - Preparing members for meetings
  - Ensuring public participation
  - Leading sub-committee discussions
  - Developing CSC Charter
- Participated in over 60 meetings with South Coast AQMD
  - Collaborated on meeting agendas and discussion activities
  - Reviewed and discussed proposed revisions to the CERP
  - Authored several CERP chapters

Community Boundary



Community Meetings

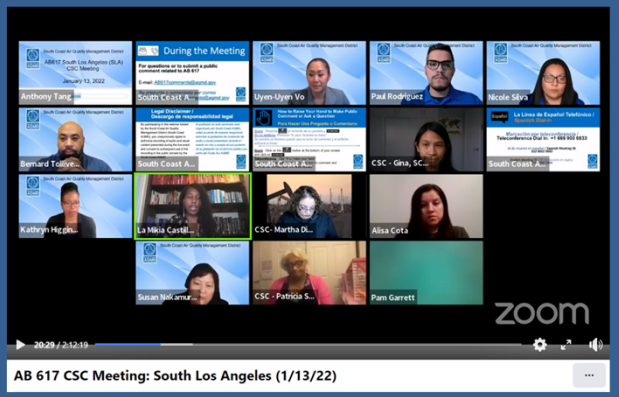
- **25+ community meetings held during CERP development, including:**
  - 16 CSC meetings
  - 8 Monitoring Working Team meetings
  - 2 Virtual Office Hours
  - 2 In-Person Meet and Greet
- **60 meetings with community co-leads**

PSR LA
Physicians for Social Responsibility
Los Angeles

WATTS CLEAN AIR & ENERGY COMMITTEE

SCOPE STRATEGIC COMMUNITY AGENDA

CSC Members



- 46 primary members and 2 alternates
  - Community co-leads
  - Active residents
  - Community organizations
  - Government agencies
  - Schools/universities
  - Businesses or labor unions
- 57% of the CSC are SLA residents

CERP Framework

5 Sources of Air Quality Priorities

Mobile Sources

Auto Body Shops

General Industrial Facilities

Metal Processing Facilities

Oil and Gas Industry

37 Goals

- Reduction of emissions
- Reduction of exposure
- Increased monitoring and detection

73 Actions

- Rule development
- Collaborations
- Incentives
- Enforcement
- Public information and outreach
- Air monitoring

CERP Strategies

- Using community co-lead and CSC input, actions are written to uniquely address the concerns of the SLA community
- Some actions will result in benefits to other South Coast AQMD AB 617 communities

Rule Development

Rule	Pollutants	Action
Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene	VOC	• Evaluate standard for new dry cleaning machines to minimize or eliminate VOC emissions New
Rule 1148.1 – Oil and Gas Production Wells	VOC, NOx, PM, Toxics	• Explore limiting or eliminating use of odorants and chemicals used onsite New • Explore requirements for lower-emission or zero-emission equipment for on-site operations
Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers	N/A	• Expand notifications to include injection wells and workover rig operations New • Explore feasibility of additional notifications for active acid work and other chemicals used on site New • Notification of modifications to any previously noticed work New

Rule Development *(continued)*

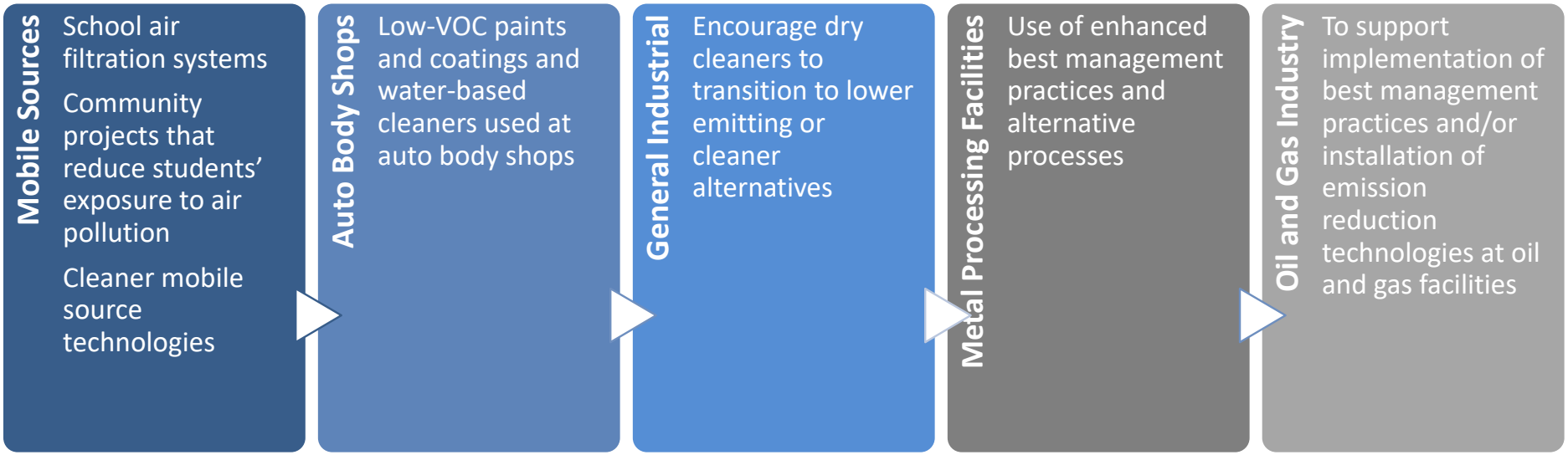
Rule	Pollutant	Action
Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations	VOC	• Include U.S. EPA best management practices as requirements for auto body shops New
Rule 1171 – Solvent Cleaning Operations	VOC	• Include U.S. EPA best management practices as requirements for auto body shops New
Rule 1460 – Control of Particulate Emissions from Metal Recycling and Shredding Operations	PM (Fugitive dust and metal particulates)	• Enhance current best management practices for fugitive dust (from metals)
Toxic Rules (Rules 1407, 1407.1, 1420, 1420.1, 1420.2, 1426, 1430, 1469, and 1469.1)	Lead, Hexavalent Chromium, Nickel, Cadmium, Arsenic	• Assessment of best management practices, and if necessary, initiate rulemaking to incorporate provisions for best management practices New

Agency and Community Collaborations

- Includes actions to collaborate and partner with other agencies to:
  - Identify truck routes for mobile sources
  - Conduct inspection sweeps of auto body shops and industrial facilities
  - Share report inspection results and coordinate with appropriate agencies
  - Collaborate with other agencies for oil and gas monitoring

Incentives

- CARB distributes incentives for the AB 617 program through Community Air Protection Program (CAPP) incentives
- CAPP incentive funds can only be used for projects or technologies supported by an adopted CERP
- This CERP includes incentives in each air quality priority:



Enforcement

Mobile Sources

- Truck idling inspection sweeps by South Coast AQMD
- Compliance inspections of trucks and buses by CARB

Auto Body Shops

- Auto body shop inspection sweeps and enforcement action when appropriate
- Door-to-door focused enforcement of potential auto body shops

General Industrial Facilities

- Enforcement of existing South Coast AQMD and CARB dry cleaning regulations
- Focused enforcement at construction sites

Metal Melting Facilities

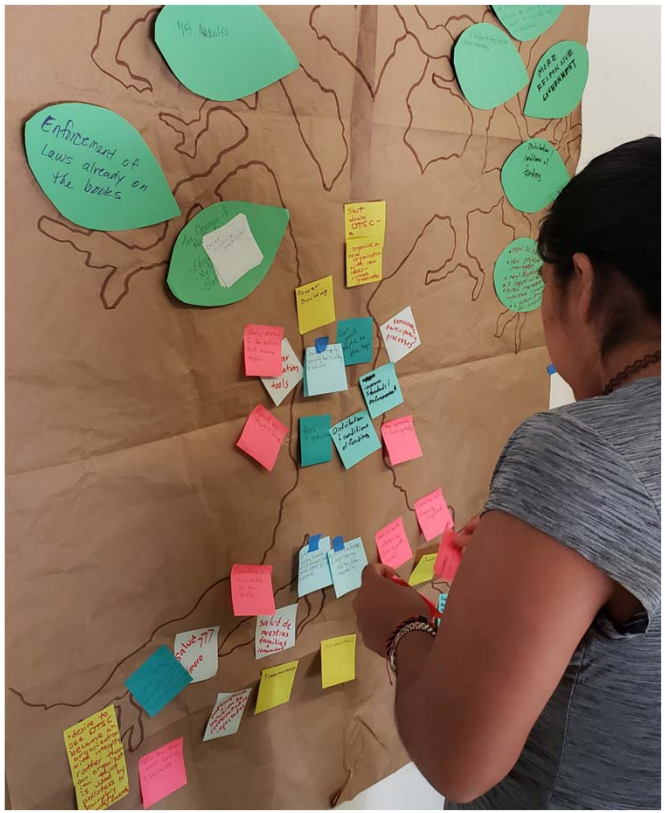
- Enforce CARB Chrome Plating Airborne Toxic Control Measure through South Coast AQMD Rule 1469*

Oil and Gas Industry

- Summaries of findings from enforcement activities and enforcement action taken
- CARB and South Coast AQMD to conduct inspections at oil and gas facilities of concern

*Rule 1469 – Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations

Public Information and Outreach



- Outreach on warehouse rule (Rule 2305)
  Outreach for online tools to access monitoring data
- Distribute outreach materials on rules, “Good Neighbor” practices, filing a complaint, permitting, incentives, and cleaner alternative technologies
- Conduct workshops (e.g., auto body, emissions reporting)
- F.I.N.D. tool and filing air quality complaints training
- Provide overview of criteria pollutants and toxics that may be found in the community

Air Monitoring

CSC-Identified Facilities of Concern

- Auto Body Shops
- General Industrial
- Metal Processing Facilities
- Oil and Gas Industry

Air Measurement Surveys

To identify and characterize any potential emissions

Monitoring Data

- Results will be presented to the CSC
- Data will be available online

Key Issue – CERP Development Process

Comment	Response

CERP development was not a community driven process and representative of the community's concerns	• Community co-leads and representatives and CSC members dedicated substantial time to CERP development
	  o Virtual meetings provided greater access to the community, but contributed to communication challenges
	• South Coast AQMD held over 80 community meetings and worked collaboratively with the community co-leads and CSC to develop the CERP
	• To increase community engagement, the following tools were used:
	  o Google Jamboard
	  o Google Forms
	  o Language justice/interpretation services
	  o Breakout sessions
	  o Office hours sessions
	  o In-person meet and greet

Key Issue – Emission Reductions

Comment	Response
Timeline did not allow for meaningful community engagement	• Recognize challenges of compressed timeframe • State law requires CERP adoption within one year of community designation • Extension request provided additional time for development and community input (February to June 2022) • Assembly Bill 1749 (C. Garcia) extends CERP development to two years
Need quantifiable, permanent, and enforceable emissions reductions beyond what is already required	• CERP has the potential to reduce: o 193 tpy of NOx and 2.3 tpy of DPM emissions by 2026* o 300 tpy of NOx and 3.8 tpy of DPM emissions by 2031* • CERP will result in emission and exposure reductions • Emission reductions will provide long-term benefits for public health • Some actions reduce fugitive emissions, which are not quantifiable
Require zero-emission equipment and fleets for industrial operations	Supports zero-emission technology when technically feasible and cost-effective

*Projected from emission reduction targets from CARB's statewide measures and assuming a minimum of $10 million invested for mobile source projects

Recommendation

Adopt Resolution:

- Determining that the SLA CERP is exempt from CEQA
- Adopting the SLA CERP