# AB 617 SOUTH LOS ANGELES COMMUNITY STEERING COMMITTEE

## November 16th, 2021

# Language Justice Announcement

## During the Event

### SLOW DOWN

Facilitators, presenters, trainers, participants... anyone speaking during the event, **speak at a moderate pace. Take a breath** after each sentence, **take a pause** after switching speakers and asking questions. Slowing down supports **EVERYONE**, not just interpreters.

### SPEAK-UP

Speak loud and clear! Ideally, **using headphones with a mic.** Interpreters need to be able to hear the speaker over the sound of their own voice when doing simultaneous interpretation.

### SAY YOUR NAME EACH TIME YOU SPEAK

Folks listening to the interpretation might only hear the interpreters voice, so they will not notice when a new person is speaking.

### ONE PERSON AT A TIME

Interpreters can only interpret for **one person at a time,** and they don't want to be put in the position of having to decide which voice to privilege over another.

### LANGUAGE IS NOT A BARRIER

To the contrary, when we have multiple languages in a space, **we have multiple cosmovisions,** and multiple ways of understanding the world. We have the opportunity to expand and deepen our perspective, our imaginations, the possible strategies, tactics, and visions for what is possible.

Created by: catalina.nieto.interpretation@gmail.com With the advice, expertise and support of many people in the Language Justice Community

# Today's Agenda

**PART 1: Where are We At - SCAQMD Update**

**PART 2: Oil and Gas/Mobile Sources Subcommittees Debrief - Actions Identified**
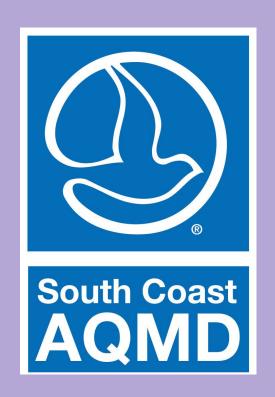
**PART 3: Defining Air Quality Priorities for Auto Body Shops / Metal Facilities**

**PART 4: Diving into Solutions/Actions Identified for Oil and Gas/ Mobile Sources**

**PART 5: Defining Next Steps**

**PART 6: Public Comments**

# CSC MEETING TIMELINE

**August 5, 2021**
- *CSC Mtg.*
  - Finalized AQ Priorities

**September 2, 2021**
- *CSC Mtg.*
  - CERP & CAMP Development Overview

**September 14, 2021**
- *Subcommittee Mtg.*
  - Mobile Sources

**September 30, 2021**
- *Subcommittee Mtg.*
  - Oil and Gas

**October 7, 2021**
- *CSC Mtg.*
  - Emissions Inventory
  - General Industrial

**October 19, 2021***
- *Cancelled for program pause*

**November 16, 2021***
- *CSC Mtg.*
  - Metals and Auto Body Shops
  - Draft CERP Actions

**December 2, 2021***
- *CSC Mtg.*
  - Draft CERP Actions

**December 9, 2021***
- *CERP Workshop*
  - Draft CERP Actions

**December 15, 2021***
- *If necessary*

* Tentative topic schedule

5

South Coast
AQMD

# PART 2: Oil and Gas and Mobile Sources Subcommittees Debrief - Actions Identified

# SUBCOMMITTEES DEBRIEF:
# ACTIONS IDENTIFIED AND SOLUTIONS

# COMMUNITY EMISSIONS REDUCTION PLAN (CERP)

**MAIN CHAPTERS**

1. **Introduction**
2. **Community Outreach**
3a. **Community Profile**
3b. **Emissions Inventory / Source Attribution**
4. **Enforcement Plan**
5. **Actions to Reduce Air Pollution Emissions or Exposure**
6. **Air Monitoring Summary**

South Coast AQMD

# ELEMENTS OF THE CERP

## Examples of CERP Goals


Conduct mobile air measurements


Reduce emissions from truck traffic and freeways


Install Air Filtration Systems at Schools

## Types of CERP Actions

- **Rules and Regulations**
- **Air Monitoring**
- **Focused Enforcement**
- **Collaboration**
- **Incentives**
- **Community Outreach**

# CERP GOALS, ACTIONS, AND METRICS

## *Description of goals, actions, and metrics*

| **Goal:** Quantitative and qualitative targets (e.g., emissions reductions targets and outreach goals) | | |
|---|---|---|
| **Action** | **Metric** | **Timeline** |
| A. Policies developed by the CSC for emissions and exposure reduction | Quantifiable measure used to track and assess the status of an action (e.g., # of idling sweeps per quarter) | Year and/or quarter to begin and complete each action |

## *Example*

| **Goal: Reduce emissions from truck traffic** | | |
|---|---|---|
| **Action** | **Metric** | **Timeline** |
| A. Conduct heavy duty truck idling sweeps | One (1) idling sweep per quarter | Begin 2nd quarter 2022 End 1st quarter 2023 |

# DISCUSSION

## COMMENTS AND QUESTIONS?

# REVIEW OF AIR QUALITY PRIORITIES AND SUBCOMMITTEE COMMENTS

**Reduce emissions and address concerns about:**

Mobile Sources

Oil and Gas Industry

General Industrial

Auto Body Shops

Metals

# Air Quality Priority: Mobile Sources

**Community members would like to address concerns about:**

- Emissions from trucks, buses, and school buses

- Heavy-duty trucks idling enforcement *(especially near residential and sensitive receptors)*

- Emissions from trains, including leakage from cargo

- Emissions from construction sites

- Catalytic converter theft

**CSC member suggestions:**

- Expedited complaint response

- Zero emission incentives for small businesses and individual truck owners

- Installation of air filtration systems at schools

- Focused outreach to provide information to students and independent owners

# POTENTIAL ACTIONS TO ADDRESS AIR QUALITY PRIORITIES IN THE DRAFT CERP

## Goal: Reduce Emissions and Exposure from Mobile Sources

### Actions

A. CARB to reduce exposure to idling in the community

- Increased truck and bus inspections at locations of concern identified by the community
- Work with warehouses on policies to reduce the impact of truck traffic on surrounding neighborhoods
- Outreach materials distribution to community on mobile source regulations and how to file a complaint with CARB
- No Idling signs installation

B. Work with local school districts and CSC members to identify and prioritize schools* exposed to truck emissions that may benefit from installation of air filtration systems

* School applicability set forth in CARB's Community Air Protection Program (CAPP) incentive guidelines (http://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives)

# POTENTIAL ACTIONS TO ADDRESS AIR QUALITY PRIORITIES IN THE DRAFT CERP

## Goal: Reduce Emissions and Exposure from Mobile Sources (*continued*)

### Actions

C. Conduct outreach to the community to inform them of mobile source regulations (CARB), best practices, and incentive programs (e.g., provide materials to independent owner operators and students to share with families)

D. Provide incentive funds for cleaner technologies (e.g., zero emission trucks) for small businesses (e.g., independent truck owners and operators)

E. Conduct focused enforcement at construction sites in the community to verify compliance

South Coast
AQMD

# Oil and Gas Industry

**Community members would like to address concerns about:**

- Diesel equipment used at oil and gas sites
- Proximity to residents and students
- Public notice and disclosure of chemicals used
- Abandoned oil and gas sites
- Lack of ease of access to data

**CSC member suggestions**

- Collaborate with other regulatory entities to address concerns
- Provide education to public on regulatory authority
- Expedited complaint response
- Work with the community to gather data
- Develop system to vet facility classification data

South Coast
AQMD

# POTENTIAL ACTIONS TO ADDRESS AIR QUALITY PRIORITIES IN THE DRAFT CERP

## Goal: Reduce Emissions and Exposure from Oil and Gas Industry

### Actions

A. Conduct mobile monitoring around oil drilling sites to characterize levels of oil and gas related pollutants in the community. Work with the CSC to identify priority locations for community air monitoring.

B. Collaborate with appropriate agencies and work with the CSC to determine if air monitoring is needed during specific well activities or under certain conditions

C. Make referrals to the 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

# POTENTIAL ACTIONS TO ADDRESS AIR QUALITY PRIORITIES IN THE DRAFT CERP

## Goal: Reduce Emissions and Exposure from Oil and Gas Industry (continued)

### Actions

D. Provide CSC with periodic summaries of enforcement findings, such as whether odors/emissions were confirmed/verified with complainants and at a specific site/source, as well as any enforcement actions taken

E. Explore expanding Rule 1148.1[1] and 1148.2[2] applicability to include other well activities

F. Work with the CSC to identify opportunities to support citizen scientists to conduct community air monitoring

G. Conduct community training for the FIND (Facility Information Detail) tool

[1] Rule 1148.1: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-1.pdf?sfvrsn=4
[2] Rule 1148.2: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf?sfvrsn=4
[3] F.I.N.D. (Facility INformation Detail): http://www.aqmd.gov/nav/FIND

South Coast AQMD

# POTENTIAL ACTIONS TO ADDRESS AIR QUALITY PRIORITIES IN THE DRAFT CERP

## Goal: Reduce Emissions and Exposure from Oil and Gas Industry (continued)

**Actions**

H. CARB to provide outreach and education, and enforcement support through:
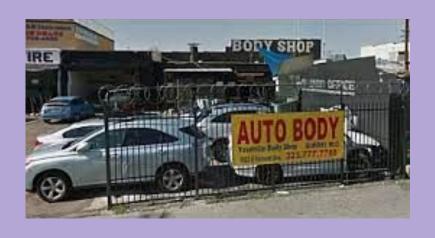
- Conducting CalEPA complaint process training
- Conducting site/field investigations
- Coordinating with air district for permitting and notification support
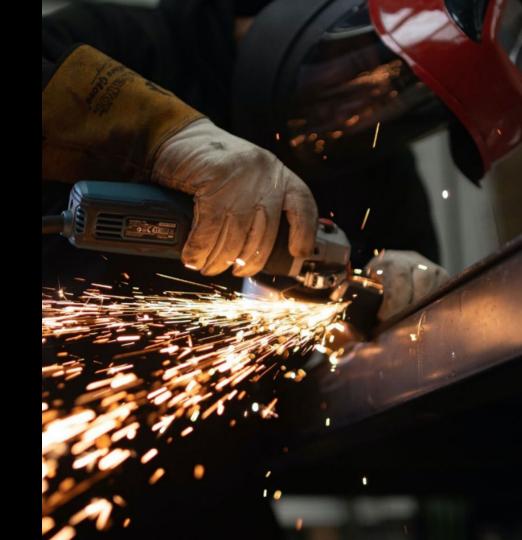- Identifying next steps through Community Pollution Enforcement Workgroup

South Coast
AQMD

# DISCUSSION

## COMMENTS AND QUESTIONS?

# PART 3: Defining Air Quality Priorities for Auto Body Shops / Metal Facilities

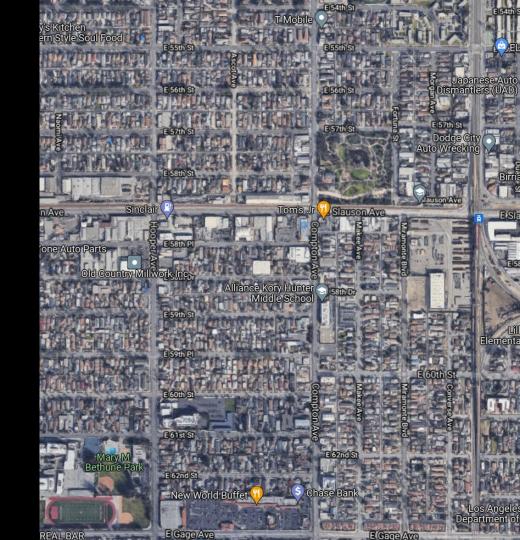**METAL MANUFACTURING CASE STUDY**

California Metal X
Lead-Free Metal Brass
Alloys For Water
Supply Systems

For the purpose of this case study, we focused on a specific metal manufacturing facility—California Metal X. CMX is a metals processing facility that supplies metal alloys to potable water systems.

CMX operations and equipment are continuously modified to reduce pollution burden.

## THE PROBLEM

Copper-based brass alloys have long been used for potable water supply components due to the durability and corrosion resistance of copper.

In the United States, the 1974 Safe Drinking Water Act (SDWA) was enacted to ensure safe drinking water in every community by setting maximum concentration limits for chemicals that adversely impact water quality, including copper and lead.

## POLLUTION BURDEN & HEALTH IMPACTS:

Lead is:

- Considered an extremely toxic element with no known safety threshold.

- A potent developmental toxic and increased evidence has shown that health impacts can arise even at very low concentrations impacting cognitive ability, particularly in children.

- Lead-bearing brass alloys in water supply systems have contributed to increased exposure to lead

## REGRETTABLE SUBSTITUTIONS:

- In 2011, the SDWA dictated a phase out of leaded brass potable water supply components.

- This law enabled metal industries to switch to bismuth brass alloys which was recommended as a safer alternative.However, bismuth when extracted contains toxic lead.

- By enforcing this law, California proliferated a switch to a regrettable substitution—bismuth brass—without considering the impacts of bismuth's extraction, production, and disposal which enable the continued led-contamination in water and air pollution burden in frontline communities.

## BEST PRACTICES & CONTROL TECHNOLOGIES:

- CMX implementation of best practices and control technologies has created positive environmental health benefits and reduced air pollution.

- Some of the best practices include using a water filtration system to prevent toxic metals from entering the environment and using wet sweeping to wash metal particulates into the filtration system to minimize air emissions.

## NON-TOXIC SUSTAINABLE ALTERNATIVES:

- Silicon brass is a less toxic, more sustainable, leadfree substitute to lead-bearing and bismuth-bearing brass alloys for potable water supply applications.

- Reducing lead concentration of silicon brass to the lowest achievable level of 0.02% would further reduce adverse impacts.

## JUST TRANSITION & CLEAN PRODUCTION:

By switching to a clean production approach, safer alternative silicon brass, and best available control technologies, metal facilities can reduce frontline community's exposure to lead in water and air pollution impacts related to manufacturing brass alloys
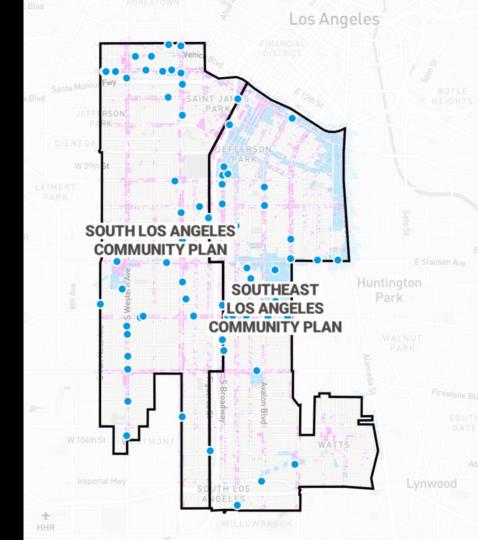
**AUTO BODY SHOPS
CASE STUDY**

## THE PROBLEM:

There are approximately more than 55 auto body shops located in South Central Los Angeles.

In addition, there are countless auto body shops located in South LA that are missing or misclassified by regulatory agencies which leads to inaccurate data on air pollution emissions and its impacts on public health.

## POLLUTION BURDEN & HEALTH IMPACTS:

- The paints or coatings used at auto body shops may cause odors and emit air pollutants, including volatile organic compounds (VOCs) or toxic air contaminants, such as metals.

- Other operations can result in emissions of fine dust from metal compounds (e.g., chromium and nickel).

- These pollutants can contribute to health problems including a number of respiratory effects and are the leading cause of occupational asthma.

# BEST PRACTICES & CONTROL TECHNOLOGIES:

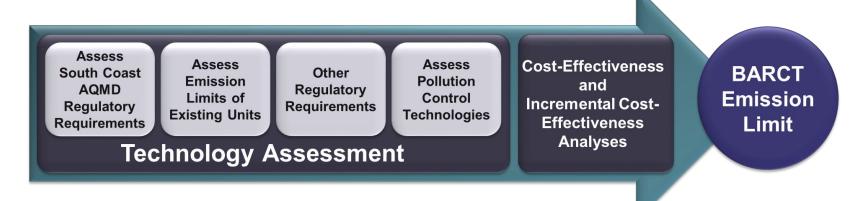**TABLE 4:** TOP 6 EPA BEST PRACTICES FOR AUTO BODY SHOPS

| Category | Benefits |
|---|---|
| **Requirements:** | |
| Ventilated spray booths with filters that are at least 98% efficient | ■ Removes paint overspray from the air<br>■ Less contact with hazardous coating materials |
| Prohibit clean spray guns by spraying solvent through the gun, creating an atomized mist | ■ Minimizes contact with hazardous solvents<br>■ Minimizes emissions of hazardous chemicals into the air |
| **Best Practices:** | |
| Use low VOC or water-based cleaners, primers, and base coats | ■ Reduces or eliminates VOC emissions |
| Keep all containers shut when not in use | ■ Reduces emissions and occupational exposure |
| Make Material Safety Data Sheets available to shop workers | ■ Increases worker awareness of toxicity of chemicals leading to greater care in chemical use |

# Best Available Retrofit Control Retrofit Control Technology (BARCT) Assessment
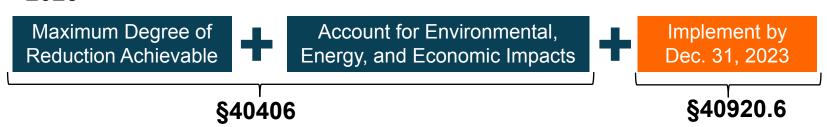
# BARCT Assessment Background

- Proposed BARCT emission limits are established using a methodical approach consistent with state law

- South Coast AQMD uses a cost-effectiveness threshold $50,000/tons NOx reduced as a guide – from 2016 AQMP



Technology Assessment:
- Assess South Coast AQMD Regulatory Requirements
- Assess Emission Limits of Existing Units
- Other Regulatory Requirements
- Assess Pollution Control Technologies

Cost-Effectiveness and Incremental Cost-Effectiveness Analyses

BARCT Emission Limit

# BARCT and AB 617

- California Health and Safety Code §40406 defines BARCT as "an emission limitation that is based on the maximum degree of reduction achievable by each class or category of source, taking into account environmental, energy, and economic impacts."

- California Health and Safety Code §40920.6 (c)(1) requires, air districts to "…adopt an expedited schedule for the implementation of BARCT, by the earliest feasible date, but in any event not later than December 31, 2023"

| Maximum Degree of Reduction Achievable | **+** | Account for Environmental, Energy, and Economic Impacts | **+** | Implement by Dec. 31, 2023 |
|---|---|---|---|---|

**§40406**  **§40920.6**

# Application of BARCT Emission Limits

- BARCT emission limits are incorporated in rules and regulations
- In general, BARCT emission limits establish emission standards for existing equipment
- Operators can meet the BARCT emission limit through variety of techniques such as:
  - Material substitution (cleaner fuels, lower VOC materials)
  - Burner replacement (combustion equipment)
  - Add on pollution controls
  - Equipment replacement

# Defining Air Quality Priorities for Auto Body Shops / Metal Facilities

Jamboard Activity Steps:
1. Walking through the community
2. The facility Itself
3. What else we need to account for

# PART 4: Diving into Solutions/Actions Identified for Oil and Gas/ Mobile Sources

# Diving into Solutions/Actions Identified for Oil and Gas/ Mobile Sources

## World Cafe Groups Activity Instructions

**Understanding**

Air pollution solutions effectiveness in terms of individual and community protection

**Ground Truthing**

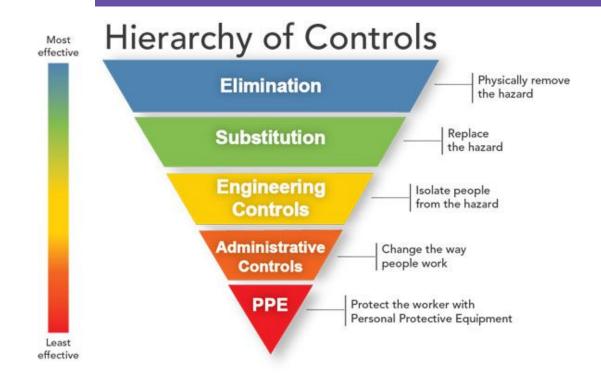Solutions and actions to reduce air pollution and identify gaps and other potential needed solutions

**Discussing**

And envision other potential solutions and how we can go above and beyond

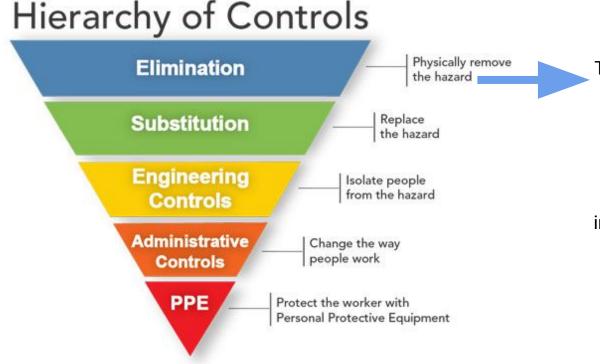# World Cafe Groups Activity Instructions

## Understanding

Air pollution solutions effectiveness in terms of individual and community protection
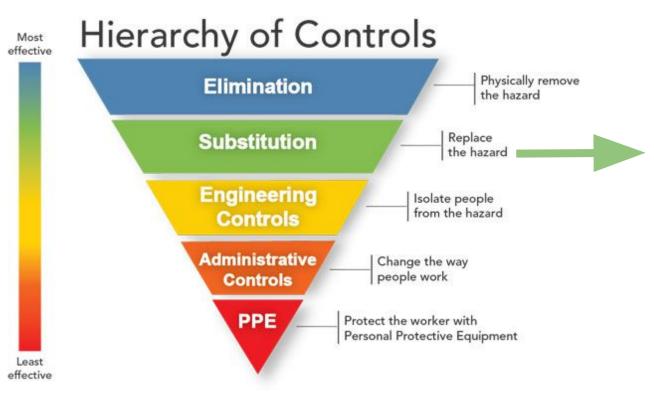


Hierarchy of Controls

Most effective

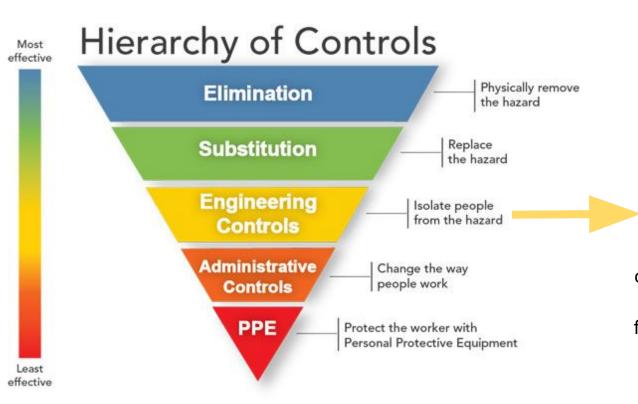Elimination — Physically remove the hazard

Substitution — Replace the hazard

Engineering Controls — Isolate people from the hazard

Administrative Controls — Change the way people work

PPE — Protect the worker with Personal Protective Equipment

Least effective

# Hierarchy of Controls: Elimination



## Hierarchy of Controls

Most effective

**Elimination** — Physically remove the hazard

**Substitution** — Replace the hazard

**Engineering Controls** — Isolate people from the hazard

**Administrative Controls** — Change the way people work

**PPE** — Protect the worker with Personal Protective Equipment

Least effective

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

# Hierarchy of Controls: Substitution

## Hierarchy of Controls

Most effective

**Elimination** — Physically remove the hazard

**Substitution** — Replace the hazard

**Engineering Controls** — Isolate people from the hazard

**Administrative Controls** — Change the way people work

**PPE** — Protect the worker with Personal Protective Equipment

Least effective

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
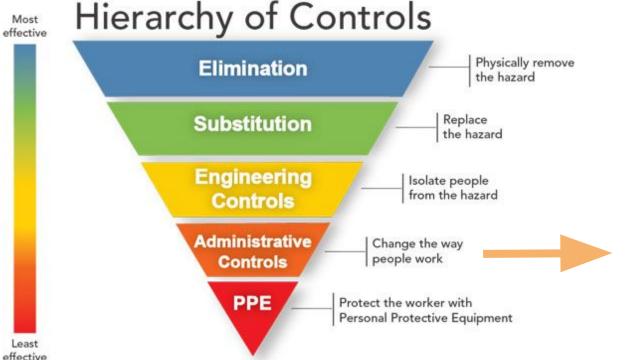
Hierarchy of Controls

Most effective

Least effective

**Elimination** — Physically remove the hazard

**Substitution** — Replace the hazard

**Engineering Controls** — Isolate people from the hazard

**Administrative Controls** — Change the way people work

**PPE** — Protect the worker with Personal Protective Equipment

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.

## Hierarchy of Controls

Most effective

Least effective

**Elimination** — Physically remove the hazard

**Substitution** — Replace the hazard

**Engineering Controls** — Isolate people from the hazard

**Administrative Controls** — Change the way people work

**PPE** — Protect the worker with Personal Protective Equipment

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

# Hierarchy of Controls: Protective Personal Equipment



Hierarchy of Controls

Most effective

Least effective

**Elimination** — Physically remove the hazard

**Substitution** — Replace the hazard

**Engineering Controls** — Isolate people from the hazard

**Administrative Controls** — Change the way people work

**PPE** — Protect the worker with Personal Protective Equipment

Personal protective equipment might be a hard hat at a construction site or gloves in a laboratory

# World Cafe Groups Activity Instructions

## Ground Truthing
Solutions and actions to reduce air pollution and identify gaps and other potential needed solutions

## Discussing
And envision other potential solutions and how we can go above and beyond

1. Where do you think "this CERP action/ solution" falls within the hierarchy of controls? Does it get at protecting individuals or does it move us toward elimination of air pollution coming from this source?

If it falls within substitution or elimination (most effective)

2. Do you think "this CERP action/solution" could be strengthened to make it more effective? If so How?

If it falls within the protecting the individual (least effective)

3. If it doesn't get us to elimination of air pollution from this source, does it help us regulate it while we move toward a green alternative solution? (e.g. renewable energy)

4. What are other actions do you think need to be taken to reduce emissions in this industry?

Groundtruthing Solutions for Oil and Gas