

REVISED



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396-2000, www.aqmd.gov

STATIONARY SOURCE COMMITTEE MEETING

Committee Members

Council Member Ben Benoit, Chair
Senator Vanessa Delgado (Ret.)
Board Member Gideon Kracov
Council Member Judith Mitchell
Supervisor V. Manuel Perez
Supervisor Janice Rutherford

April 17, 2020 ♦ 10:30 a.m.

Pursuant to Governor Newsom's Executive Orders N-25-20 (March 12, 2020) and N-29-20 (March 17, 2020), the Stationary Source Committee meeting will only be conducted via video conferencing and by telephone. Please follow the instructions below to join the meeting remotely.

ELECTRONIC PARTICIPATION INFORMATION

(Instructions provided at bottom of the agenda)

Join Zoom Meeting - from PC or Laptop
<https://scaqmd.zoom.us/j/113718569>

Meeting ID: 113 718 569 (applies to all)

Teleconference Dial In

+1 669 900 6833

One tap mobile

+16699006833,113718569#

Audience will be able to provide public comment through telephone or Zoom connection.

PUBLIC COMMENT WILL STILL BE TAKEN

AGENDA

Members of the public may address this body concerning any agenda item before or during consideration of that item (Gov't. Code Section 54854.3(a)). If you wish to speak, raise your hand on Zoom or press Star 9 if participating by telephone. All agendas for regular meetings are posted at South Coast AQMD, 21865 Copley Drive, Diamond Bar, California, at least 72 hours in advance of the regular meeting. Speakers may be limited to three (3) minutes each.

CALL TO ORDER

INFORMATION ITEM (Item 1)

1. **Summary of Proposed Amended Rule 1117 – Emissions from Container Glass Melting and Sodium Silicate Furnaces** *(No Motion Required)* (15 mins) Michael Morris
Planning and Rules
Manager
- Proposed Amended Rule 1117 establishes NO_x and SO_x emission limits for two facilities producing container glass and sodium silicate. Staff will provide a briefing on the proposed amended rule and any key issues.
(Written Material Attached)

WRITTEN REPORTS (Items 2- 4)

2. **Notice of Violation Penalty Summary** *(No Motion Required)* Bayron Gilchrist,
General Counsel
- This report provides the total penalties settled in March of 2020 which includes Civil, Supplemental Environmental Projects, Mutual Settlement Assessment Penalty Program, Hearing Board and Miscellaneous.
(Written Material Attached)
3. **Monthly Update of Staff's Work with U.S. EPA on New Source Review Issues for the Transition of RECLAIM Facilities to a Command and Control Regulatory Program** *(No Motion Required)* Susan Nakamura
Assistant Deputy
Executive Officer
- This is a summary of staff's work with U.S. EPA over the past month to resolve command and control regulatory program.
(Written Material Attached)
4. **Twelve-month and Three-month Rolling Price of RTCs for Compliance Years 2019 and 2020** *(No Motion Required)* Amir Dejbakhsh
Deputy Executive Officer
- The attached quarterly report summarizes the twelve-month and three-month rolling averages prices of NO_x and SO_x RTCs.
(Written Material Attached)

OTHER MATTERS

5. **Other Business**
- Any member of the Committee, or its staff, on his or her own initiative or in response to questions posed by the public, may ask a question for clarification, may make a brief announcement or report on his or her own activities, provide a reference to staff regarding factual information, request staff to report back at a subsequent meeting concerning any matter, or may take action to direct staff to place a matter of business on a future agenda. (Gov't. Code Section 54954.2)

6. Public Comment Period

At the end of the regular meeting agenda, an opportunity is also provided for the public to speak on any subject within the Committee's authority that is not on the agenda. Speakers may be limited to three (3) minutes each.

7. Next Meeting Date: Friday, May 15, 2020 at 10:30 a.m.

ADJOURNMENT

Americans with Disabilities Act and Language Accessibility

Disability and language-related accommodations can be requested to allow participation in the Stationary Source Committee meeting. The agenda will be made available, upon request, in appropriate alternative formats to assist persons with a disability (Gov't Code Section 54954.2(a)). In addition, other documents may be requested in alternative formats and languages. Any disability or language related accommodation must be requested as soon as practicable. Requests will be accommodated unless providing the accommodation would result in a fundamental alteration or undue burden to the South Coast AQMD. Please contact Catherine Rodriguez at (909) 396-2735 from 7:00 a.m. to 5:30 p.m., Tuesday through Friday, or send the request to Crodriguez@aqmd.gov.

Document Availability

All documents (i) constituting non-exempt public records, (ii) relating to an item on an agenda for a regular meeting, and (iii) having been distributed to at least a majority of the Committee after the agenda is posted, are available by contacting Catherine Rodriguez at (909) 396-2735, or send the request to Crodriguez@aqmd.gov.

INSTRUCTIONS FOR ELECTRONIC PARTICIPATION

Instructions for Participating in a Virtual Meeting as an Attendee

As an attendee, you will have the opportunity to virtually raise your hand and provide public comment.

Before joining the call, please silence your other communication devices such as your cell or desk phone. This will prevent any feedback or interruptions during the meeting.

Please note: During the meeting, all participants will be placed on Mute by the host. You will not be able to mute or unmute your lines manually.

After each agenda item, the Chairman will announce public comment.

A countdown timer will be displayed on the screen for each public comment.

If interpretation is needed, more time will be allotted.

Once you raise your hand to provide public comment, your name will be added to the speaker list. Your name will be called when it is your turn to comment. The host will then unmute your line.

Directions for Video ZOOM on a DESKTOP/LAPTOP:

- If you would like to make a public comment, please click on the **“Participants”** button on the bottom of the screen.
- A list of participants will appear on the right side of the screen. At the bottom of the list, please click on the grey **“Raise Hand”** button.
- This will signal to the host that you would like to provide a public comment and you will be added to the list.

Directions for Video Zoom on a SMARTPHONE:

- If you would like to make a public comment, please click on the **“Participants”** button on the bottom of your screen.
- A new screen will pop up with the list of participants. Look for the **“Raise Hand”** button on the screen and click the button.
- This will signal to the host that you would like to provide a public comment and you will be added to the list.

Directions for TELEPHONE line only:

- If you would like to make public comment, please **dial *9** on your keypad to signal that you would like to comment.



Proposed Amended Rule 1117 Emissions From Container Glass Melting and Sodium Silicate Furnaces

Stationary Source Committee

April 17, 2020

Background

- PAR 1117
 - Establishes Best Available Retrofit Control Technology (BARCT) NO_x and SO_x emission limits for furnaces and auxiliary equipment at container glass melting and sodium silicate facilities
 - Transition container glass melting and sodium silicate facilities to a command and control regulatory structure
 - Rule last amended in 1984
- 2016 AQMP Control Measure CMB-05
 - Achieve five tons per day NO_x emission reduction in RECLAIM by 2025
 - Transition RECLAIM to a command and control regulatory structure requiring BARCT level controls as soon as practicable
- AB 617
 - Implementation of BARCT by December 31, 2023
 - Priority given to older, higher polluting units



<https://siccode.com/sic-code/3221/glass-containers>

Two RECLAIM Facilities Subject to PAR 1117



One
Container
Glass
Facility



- Two glass melting furnaces
- Auxiliary combustion equipment
 - Two conveyance systems associated with process
 - Three smaller annealing furnaces



One
Sodium
Silicate
Facility



- One sodium silicate furnace

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BARCT Assessment

Assessment of
SCAQMD
Regulatory
Requirements

Assessment of
Emission
Limits for
Existing Units

Other
Regulatory
Requirements

Assessment of
Pollution
Control
Equipment

Initial BARCT
Emission Limit
and Other
Considerations

Cost-
effectiveness
Analysis

BARCT
Emission
Limit

Technology Assessment

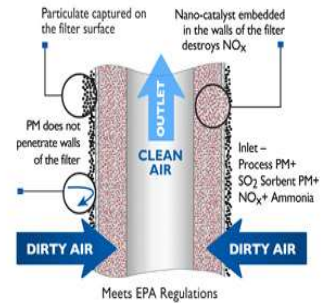
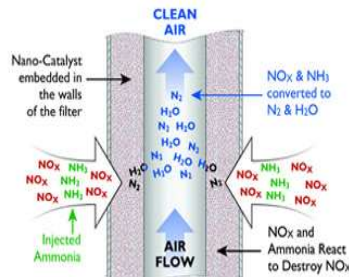
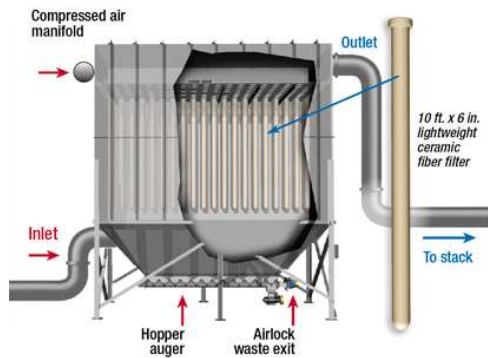
- BARCT emission limits represent the maximum degree of reductions achievable, taking into account environmental, energy, and economic impacts for this class/category of sources¹
- Conducted technology assessment and cost-effectiveness analysis to establish BARCT emission limits
- Separate emission limits for
 - Container glass melting furnaces and auxiliary equipment
 - Sodium silicate furnace

¹ Health and Safety Code Section 40406

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Existing Air Pollution Control Equipment

- In 2017, both facilities installed Selective Catalytic Reduction technology that uses ceramic filter elements
- Technology represents BARCT for both container glass and sodium silicate furnaces

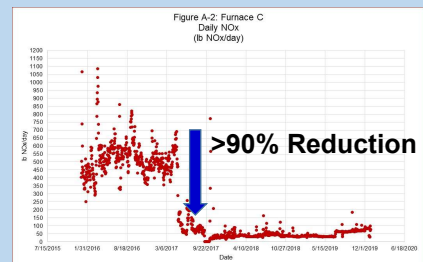
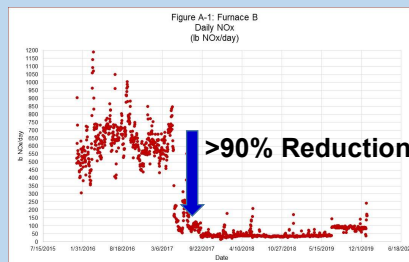


*Images courtesy of Tri-Mer Corporation

NOx Emissions Reductions

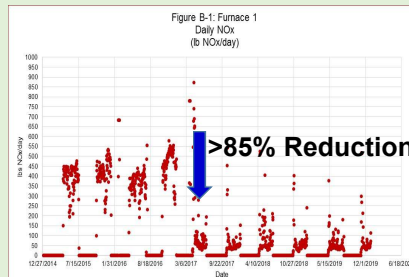
Container Glass Melting Furnaces

- Reduced NOx emissions >90% from 2016 emission levels
- Currently below 0.25 lb NOx/ton of glass pulled



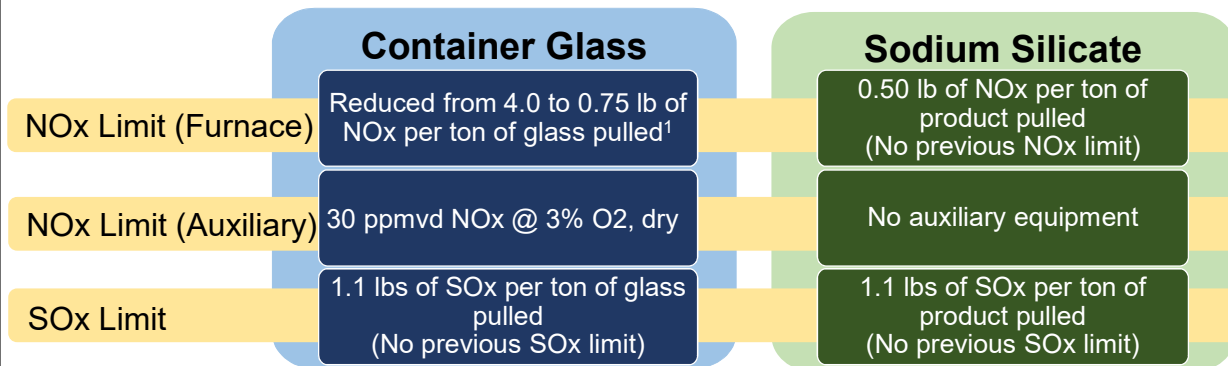
Sodium Silicate Furnace

- Reduced NOx emissions >85% from 2016 emission levels
- Batch operation different from container glass facility



Proposed Amendments to Rule 1117

- PAR 1117 codifies emission levels demonstrated for container glass and sodium silicate furnaces



¹ Staff has increased the proposed NOx limit for container glass melting furnaces from 0.25 to 0.75 lb per ton of glass pulled to address equipment aging concerns and need for compliance margin

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Other Proposed Amendments

Operational Considerations

- Minimize uncontrolled emissions while considering operational concerns
- Startups and shutdowns for these furnaces have long durations to ensure refractory integrity and product quality
- Time needed to reach pollution control operating temperature

Startup

- 720 hours per event

Shutdown

- 240 hours per event

Idling

- 240 hours consecutive per event
- 960 hours cumulative per rolling 365-day period

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Emission Reductions and Cost-Effectiveness

NOx Emission Reductions (tons per day)	Cost Effectiveness (\$/ton)
0.55	\$23,500

- Cost-effectiveness calculation includes:
 - Capital costs for the installation of the pollution control systems
 - Operational costs of the air pollution control equipment including oxy-fuel costs (if applicable)
- Cost data provided by the facilities

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Next Steps

- Set Hearing May 1, 2020
- Public Hearing June 5, 2020

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**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
 General Counsel's Office
 DRAFT
 March 2020 Settlement Penalty Report**

Total Penalties

Civil Settlements: \$103,300.00
 MSPAP Settlements: \$11,055.00
 Hearing Board Settlements: \$27,000.00

Total Cash Settlements: \$141,355.00

Total SEP Value: \$0.00

Fiscal Year through 3 / 2020 Cash Total: \$11,741,610.36
Fiscal Year through 3 / 2020 SEP Value Only Total: \$0.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
Civil Settlements						
148236	AIR LIQUIDE LARGE INDUSTRIES U.S., LP	2004 2005 3002	3/4/2020	TRB	P64038 P67310	\$25,000.00
800016	BAKER COMMODITIES INC	2004 3002(c)(1)	3/26/2020	TRB	P67305 P67306 P67307	\$6,000.00
40034	BENTLEY PRINCE STREET INC	2004(f)(1) 2012	3/4/2020	VKT	P63686 P63693	\$4,500.00
143596	C & S CAR WASH SHELL	203 461 H&S 41960	3/12/2020	ML	P64918	\$500.00
8309	CAMBRO MANUFACTURING CO	3002(c)(1)	3/26/2020	TRB	P63871	\$1,000.00

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Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
142513	CRIMSON RESOURCE MANAGEMENT	1173	3/5/2020	NAS	P61524 P61525 P65306 P65307	\$5,500.00
63180	DARLING INGREDIENTS INC.	2004 2012	3/26/2020	TRB	P67304 P67309	\$5,000.00
189122	DELOS SHIPPING - NAVE PHOTON IMO 9371608	1142	3/26/2020	DH	P65116	\$22,000.00
189898	EMERALD TEXTILES, LLC	203(a)	3/4/2020	DH	P66917	\$1,200.00
2912	HOLLIDAY ROCK CO INC	2004 2012	3/12/2020	ML	P65370	\$4,000.00
40483	NELCO PROD. INC	2004	3/18/2020	ML	P64139	\$4,000.00
12428	NEW NGC, INC.	2012 2012 Appendix A	3/18/2020	VKT	P66902	\$8,500.00
174704	TESORO LOGISTICS, EAST HYNES TERMINAL	3002	3/26/2020	NSF	P66504	\$2,500.00
181667	TORRANCE REFINING COMPANY LLC	461	3/4/2020	DH	P68207	\$2,000.00
169995	VINYL COATING SOLUTIONS	1145 1171	3/18/2020	BT	P68633	\$1,600.00
146536	WALNUT CREEK ENERGY, LLC	2004	3/12/2020	ML	P64413	\$10,000.00
Total Civil Settlements: \$103,300.00						

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Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
MSPAP Settlements						
163436	ABC LIOVIN DRILLING INC	13 CCR 2460	3/25/2020	GC	P68511	\$400.00
155446	AHMED UNION 76	461 H&S 41960.2	3/25/2020	TF	P69013	\$800.00
84659	BIXBY KNOLLS TOWERS	222	3/25/2020	GC	P65777 P65790	\$1,560.00
178478	COPPER WASH, LLC	203 461	3/25/2020	GC	P67660	\$2,310.00
177415	EL DORADO GOLF COURSE/AMERICAN GOLF	222 461	3/25/2020	GC	P65788	\$935.00
148920	ENCINO LAND ROVER	461(c)(3)(Q)	3/25/2020	GV	P76927	\$600.00
188027	EVERGREEN MEMORIAL SERVICES, INC.	203	3/25/2020	GC	P62764	\$1,200.00
188899	MALIBU GRANITE	403	3/4/2020	TF	P65860	\$800.00
67705	O'CONNOR LAGUNA HILLS MORTUARY	203(b)	3/4/2020	TF	P56747	\$800.00
142730	SANG HAN ENTERPRISE INC	461	3/4/2020	TF	P67676	\$800.00
143205	US PETRO, INC/CHEVRON FONTANA	203	3/4/2020	TF	P66375	\$850.00

Total MSPAP Settlements: \$11,055.00

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Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
Hearing Board Settlements						
104234	MISSION FOODS CORPORATION	202 203(b) 1153.1 1303	3/13/2020	KCM	5400-4	\$25,000.00
181758	RUDOLPH FOODS WEST, INC.	202	3/13/2020	KCM	6168-1	\$2,000.00
Total Hearing Board Settlements: \$27,000.00						

**SOUTH COAST AQMD'S RULES AND REGULATIONS INDEX
FOR MARCH 2020 PENALTY REPORT**

REGULATION II - PERMITS

- Rule 202 Temporary Permit to Operate
- Rule 203 Permit to Operate
- Rule 222 Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II

REGULATION IV - PROHIBITIONS

- Rule 403 Fugitive Dust - Pertains to solid particulate matter emitted from man-made activities
- Rule 461 Gasoline Transfer and Dispensing

REGULATION XI - SOURCE SPECIFIC STANDARDS

- Rule 1142 Marine Tank Vessel Operations
- Rule 1145 Plastic, Rubber and Glass Coatings
- Rule 1153.1 Emissions of Oxides of Nitrogen from Commercial Food Ovens
- Rule 1171 Solvent Cleaning Operations
- Rule 1173 Fugitive Emissions of Volatile Organic Compounds

REGULATION XIII - NEW SOURCE REVIEW

- Rule 1303 Requirements

REGULATION XX - REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

- Rule 2004 RECLAIM Program Requirements
- Rule 2005 New Source Review for RECLAIM
- Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions
- Appendix A
- Rule 2012 Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions

REGULATION XXX - TITLE V PERMITS

- Rule 3002 Requirements for Title V Permits

CALIFORNIA HEALTH AND SAFETY CODE

- 41960 Certification of Gasoline Vapor Recovery System
- 41960.2 Gasoline Vapor Recovery

CALIFORNIA CODE OF REGULATIONS

- 13 CCR 2460 Portable Equipment Testing Requirements

April 2020 Update on Work with U.S. EPA on New Source Review Issues for the RECLAIM Transition

At the October 5, 2018 Board meeting, the Board directed staff to provide the Stationary Source Committee with a monthly update of staff's work with U.S. EPA regarding resolving NSR issues for the transition of facilities from RECLAIM to a command and control regulatory structure. The table below summarizes key activities over the past month.

Item	Discussion
Teleconference with U.S. EPA – March 31, 2020	<ul style="list-style-type: none">• Discussed with U.S. EPA concepts for a new Large Source Bank
Teleconference with U.S. EPA – April 15, 2020	<ul style="list-style-type: none">• Follow-up discussion with U.S. EPA regarding offsets for a new Large Source Bank• Discussed NSR amendments to address the extreme nonattainment requirements for Coachella Valley



South Coast Air Quality Management District

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Twelve-Month and Three-Month Rolling Average Price of Compliance Years 2019 and 2020 NOx and SOx RTCs

April 2020 Quarterly Report to Stationary Source Committee

Table I

Twelve-Month Rolling Average Price Data for Compliance Year 2019 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2019 NOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price ¹ (\$/ton)
Jan-19	Jan-18 to Dec-18	18.2	\$103,000	5	\$5,646
Feb-19	Feb-18 to Jan-19	19.0	\$108,200	6	\$5,682
Mar-19	Mar-18 to Feb-19	19.0	\$108,200	6	\$5,682
Apr-19	Apr-18 to Mar-19	29.6	\$181,921	8	\$6,153
May-19	May-18 to Apr-19	30.2	\$186,852	9	\$6,182
Jun-19	Jun-18 to May-19	31.2	\$195,323	10	\$6,256
Jul-19	Jul-18 to Jun-19	44.3	\$278,708	14	\$6,288
Aug-19	Aug-18 to Jul-19	54.2	\$336,213	18	\$6,200
Sep-19	Sep-18 to Aug-19	57.0	\$352,313	22	\$6,184
Oct-19	Oct-18 to Sep-19	121.2	\$648,018	29	\$5,348
Nov-19	Nov-18 to Oct-19	223.6	\$1,156,517	55	\$5,171
Dec-19	Dec-18 to Nov-19	241.4	\$1,243,747	59	\$5,153
Jan-20	Jan-19 to Dec-19	254.1	\$1,374,563	61	\$5,410
Feb-20	Feb-19 to Jan-20	627.3	\$3,051,736	101	\$4,865
Mar-20	Mar-19 to Feb-20	763.8	\$3,657,124	117	\$4,788
Apr-20	Apr-19 to Mar-20	806.6	\$3,891,993	121	\$4,825

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.

Table II

Twelve-Month Rolling Average Price Data for Compliance Year 2020 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2020 NOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price¹ (\$/ton)
Jan-20	Jan-19 to Dec-19	71.0	\$865,215	11	\$12,190
Feb-20	Feb-19 to Jan-20	111.2	\$1,197,542	14	\$10,770
Mar-20	Mar-19 to Feb-20	200.4	\$1,646,922	19	\$8,220
Apr-20	Apr-19 to Mar-20	202.4	\$1,657,101	21	\$8,186

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.

Table III

Three-Month Rolling Average Price Data for Compliance Year 2019 NOx RTCs
(Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2019 NOx RTC					
Reporting Month	3-Month Period	Total Volume Traded with Price During Past 3-month (tons)	Total Price of Volume Traded During Past 3-month (\$)	Number of Trades with Price	Rolling Average Price (\$/ton)
Jan-19	Oct-18 to Dec-18	18.2	\$102,300	4	\$5,621
Feb-19	Nov-18 to Jan-19	19.0	\$107,500	5	\$5,658
Mar-19	Dec-18 to Feb-19	14.0	\$80,000	4	\$5,714
Apr-19	Jan-19 to Mar-19	11.3	\$78,922	3	\$6,969
May-19	Feb-19 to Apr-19	11.2	\$78,653	3	\$7,034
Jun-19	Mar-19 to May-19	12.2	\$87,123	4	\$7,154
Jul-19	Apr-19 to Jun-19	14.8	\$96,787	6	\$6,560
Aug-19	May-19 to Jul-19	24.0	\$150,060	10	\$6,241
Sep-19	Jun-19 to Aug-19	25.8	\$157,690	13	\$6,113
Oct-19	Jul-19 to Sep-19	76.9	\$370,010	16	\$4,812
Nov-19	Aug-19 to Oct-19	169.4	\$820,304	37	\$4,842
Dec-19	Sep-19 to Nov-19	189.4	\$918,934	38	\$4,852
Jan-20	Oct-19 to Dec-19	151.1	\$828,845	36	\$5,485
Feb-20	Nov-19 to Jan-20	422.7	\$2,002,719	51	\$4,738
Mar-20	Dec-19 to Feb-20	536.5	\$2,493,378	62	\$4,648
Apr-20	Jan-20 to Mar-20	563.9	\$2,596,352	63	\$4,605

Table IV

Three-Month Rolling Average Price Data for Compliance Year 2020 NOx RTCs
(Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2020 NOx RTC					
Reporting Month	3-Month Period	Total Volume Traded with Price During Past 3-month (tons)	Total Price of Volume Traded During Past 3-month (\$)	Number of Trades with Price	Rolling Average Price (\$/ton)
Jan-20	Oct-19 to Dec-19	71.0	\$865,215	11	\$12,190
Feb-20	Nov-19 to Jan-20	105.6	\$1,150,163	13	\$10,890
Mar-20	Dec-19 to Feb-20	167.6	\$1,414,218	12	\$8,438
Apr-20	Jan-20 to Mar-20	132.9	\$799,386	10	\$6,013

Table V

Twelve-Month Rolling Average Price Data for Compliance Year 2019 SOx RTCs
(Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2019 SOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price ¹ (\$/ton)
Jan-19	Jan-18 to Dec-18	None	-	-	-
Feb-19	Feb-18 to Jan-19	None	-	-	-
Mar-19	Mar-18 to Feb-19	25.0	\$50,000	1	\$2,000
Apr-19	Apr-18 to Mar-19	25.0	\$50,000	1	\$2,000
May-19	May-18 to Apr-19	25.0	\$50,000	1	\$2,000
Jun-19	Jun-18 to May-19	26.4	\$53,376	2	\$2,021
Jul-19	Jul-18 to Jun-19	26.4	\$53,376	2	\$2,021
Aug-19	Aug-18 to Jul-19	78.9	\$263,384	5	\$3,338
Sep-19	Sep-18 to Aug-19	88.9	\$315,130	7	\$3,544
Oct-19	Oct-18 to Sep-19	88.9	\$315,130	7	\$3,544
Nov-19	Nov-18 to Oct-19	125.7	\$1,003,808	9	\$7,985
Dec-19	Dec-18 to Nov-19	125.7	\$1,003,808	9	\$7,985
Jan-20	Jan-19 to Dec-19	125.7	\$1,003,808	9	\$7,985
Feb-20	Feb-19 to Jan-20	160.7	\$1,191,808	11	\$7,416
Mar-20	Mar-19 to Feb-20	150.2	\$1,170,958	12	\$7,795
Apr-20	Apr-19 to Mar-20	150.2	\$1,170,958	12	\$7,795

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.

Table VI

Twelve-Month Rolling Average Price Data for Compliance Year 2020 SOx RTCs
(Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2020 SOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price¹ (\$/ton)
Jan-20	Jan-19 to Dec-19	None	-	-	-
Feb-20	Feb-19 to Jan-20	None	-	-	-
Mar-20	Mar-19 to Feb-20	None	-	-	-
Apr-20	Apr-19 to Mar-20	None	-	-	-

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.