

BOARD MEETING DATE: February 1, 2019

AGENDA NO. 21

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee held a meeting on Friday, January 18, 2019. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Ben Benoit, Chair
Stationary Source Committee

LT:cr

Committee Members

Present: Council Member Ben Benoit/Chair (videoconference)
Dr. Joseph Lyou/Vice Chair
Supervisor Janice Hahn
Mayor Judith Mitchell
Supervisor V. Manuel Perez (listening only from a non-noticed location via teleconference)
Supervisor Janice Rutherford (videoconference)

Absent: None

Call to Order

Chair Benoit called the meeting to order at 10:30 a.m.

ACTION ITEM:

- 1. Determine that Proposed Amendments to BACT Guidelines and Charter for BACT Scientific Review Committee Are Exempt from CEQA, and Amend BACT Guidelines and Charter for BACT Scientific Review Committee**
Al Baez, Program Supervisor/Science and Technology Advancement, presented the proposed updates to SCAQMD BACT Guidelines and BACT Scientific Review Committee Charter.

Rita Loof, representing RadTech, Inc., thanked the Board for their directive for more frequent updates to the BACT guidelines. She also highlighted that CARB's BACT Clearinghouse site has included UV/EB technology and referenced SCAQMD BACT determinations. She requested that additional categories be added.

Dr. Lyou commented that he is also pleased to see an annual update to the BACT guidelines.

Dr. Lyou inquired if staff suggests equipment alternatives such as asking facilities to use a combined cycle turbine for lower emissions instead of simple cycle or thermal oxidizers. He also asked if it would be better to remove the contamination or use bio-remediation instead of combusting the vapors from soil extraction. Staff responded that the Clean Fuels Policy has been established since the 1980s to guide applicants to lower emissions, but we do not dictate what equipment an applicant should choose. For example, they can use UV or other coating, as long as it complies with a performance standard. Staff also stated that for a brief period SCAQMD prescribed what basic equipment to use for low emissions but the benefits were outweighed by the complexity and there were potential legal issues.

Dr. Lyou asked why BACT only references performance limits from a permit condition, not what the equipment is able to achieve day-to-day. Staff responded that to be consistent, achieved in practice is defined as an equipment showing compliance with its permit limits. If equipment manufacturers guarantee lower emissions, that level can also be incorporated into permits and specified as BACT.

Dr. Lyou requested clarification on how staff determines averaging times and what is considered more stringent. Staff responded that lower averaging times are typically more stringent but when emission limits are near detection limits of the test method, it can be more difficult to quantify emissions through a source test with a short averaging time. Extending the averaging time is sometimes considered in exchange for a lower emission limit.

Dr. Lyou asked why startups and shutdowns are excluded from the BACT limits. Staff responded that startup and shutdown periods are excluded in BACT because they are excluded in the permits.

Dr. Lyou requested a follow-up regarding the availability of UV/EB technology for categories listed in RadTech's comment letter. Staff responded that these are minor source facilities and it is often difficult to get detailed cost information from them. Staff can provide an update for the next BACT guidelines update or earlier if complete cost data is available sooner. Staff will work with Ms. Loof to get the cost data.

Moved by Mitchell; seconded by Lyou; unanimously approved.

Ayes: Benoit, Hahn, Lyou, Mitchell, Rutherford,
Noes: None
Absent: Perez

INFORMATIONAL ITEMS:

2. Update on the Development of Outreach Materials for Rule 1147 – NO_x Reductions from Miscellaneous Sources

Michael Krause, Planning and Rules Manager, provided an update on Rule 1147 outreach materials.

Bill LaMarr, California Small Business Alliance, expressed concerns about how long it took to complete the compliance pamphlets, that another month before public release is too long, and the pamphlets are different than what he previously reviewed. He stated that it is unfair for facility owners of heated paint spray booths to conduct biennial source tests in order to demonstrate emissions of <1 lb/day NO_x, which has an estimated cost of between \$15,000 to \$20,000, as compared to every five years for Rule 1469 - Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations.

Susan Nakamura, Assistant Deputy Executive Officer/Planning, Rule Development and Area Sources, responded that the content was the same, but there were format changes to the pamphlets, and offered to meet with Mr. LaMarr and other industry stakeholders to address their concerns before the public release. These pamphlets can serve as a template for other rulemaking outreach efforts, but Rule 1469 is different as it includes parametric monitoring on top of the source test requirements as well as other additional requirements, and that small businesses are granted compliance extensions for source test demonstrations under Rule 1147. Jill Whynot, Chief Operating Officer, noted that a one-month lead time for the outreach pamphlets is needed for the materials to be properly translated, produced and distributed. Mayor Mitchell requested that staff review the biennial source testing requirement for paint spray booth owners.

Dr. Lyou asked if staff has worked with other paint booth manufacturers to bring additional competition for burner retrofits, and requested that staff examine costs associated with source testing. Ms. Nakamura responded that staff will work with manufacturers to provide updates on available manufacturers of burner retrofits. She commented that Rule 1147 includes other options for facilities to demonstrate compliance in lieu of source testing.

3. Summary of Proposed Amended Rules 110, 212, 301, 303, 306, 307.1, 309, 315, 510, 515, 518.2, 812, 1309, 1310, 1605, 1610, 1612, 1620, 1623, 1710, 1714, and 3006

Planning and Rules Manager Michael Morris presented a summary of the proposed amendments to streamline notice requirements. Supervisor Hahn asked if the SCAQMD currently advertises public notices in small and community newspapers or large newspapers. Dr. Laki Tisopulos, Deputy Executive Officer/Engineering & Permitting responded that public notices are currently published in newspapers of general circulation, which includes large newspapers, but some notices are also published in local newspapers. Supervisor Hahn expressed concern over the financial impact to smaller newspapers if notices are not published in those publications. Ms. Whynot responded that notices that are currently emailed or mailed are mostly regulatory notices for rulemaking activities. Chief Deputy Counsel Barbara Baird clarified that there are two types of notices: one for rule development activities; and one for permit actions. Regarding rules, Ms. Baird mentioned that state law still requires newspaper noticing, so the SCAQMD will continue this practice. Regarding permit actions, the SCAQMD now has the option to send notices electronically. Ms. Nakamura added that CEQA, rule development, and Hearing Board notices each have different circulation requirements. Ms. Baird added that the SCAQMD is not changing CEQA noticing requirements. Supervisor Hahn asked how newspaper vendors are selected. Dr. Tisopulos replied that newspaper selection factors in costs of publication and that the objective is for the notice to reach the public. Dr. Lyou asked if the SCAQMD will maintain the same record retention policy for these notices. Ms. Whynot confirmed that electronic noticing would not change SCAQMD's record retention policy. Dr. Lyou asked if staff has explored something similar to NextDoor for public outreach as it would be an effective way to reach people. Ms. Whynot stated that staff will look into NextDoor.

4. Status Report on Reg. XIII – New Source Review

William Thompson, Senior Engineering Manager, gave a presentation on Regulation XIII, New Source Review (NSR) Equivalency for Calendar year 2017, with the conclusion that the SCAQMD's NSR progress is equivalent to federal NSR requirements on an aggregate basis and is projected to maintain equivalency for calendar year 2018 and 2019.

WRITTEN REPORTS:

5. Notice of Violation Penalty Summary

The report was acknowledged by the Committee.

6. 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

The report was acknowledged by the Committee.

7. Home Rule Advisory Group – November 2018 Meeting Minutes and the 2018 Accomplishments and 2019 Goals & Objectives

The report was acknowledged by the Committee.

8. Twelve-month and Three-month Rolling Price of RTCs for Compliance Years 2018 and 2019

The report was acknowledged by the Committee.

OTHER MATTERS:

9. Other Business

There was no other business.

10. Public Comment Period

Dan McGivney, representing the Southern California Gas Company (SoCalGas), expressed concern about the proposed amendments to Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities. He commented that the proposed amendments go beyond the Federal NESHAP requirements in regard to small renovation jobs less than 100 feet. He stated that small renovation jobs are exempt from notification and the 10-day waiting period under the NESHAP. SoCalGas provides many small renovations daily and the current proposed requirement of notification and wait times will increase their compliance costs and delay work on these small renovation jobs. Mr. McGivney respectfully requested that staff delay the public hearing set for February 1, so that they can continue to work with staff to resolve these remaining issues.

Cindy Parsons, from the Los Angeles Department of Water and Power (LADWP), commented on the proposed amendments to Rule 1403. She commented that new concerns developed at the last working group meeting regarding the two new requirements pertaining to underground piping: one issue requires an onsite inspection and the difficulties that it presents; and the other issue involves filing a procedure five which will require an additional cost. Ms. Parsons also commented on the need to have a standard operating procedure for asbestos clean-up. The LADWP would also like to request a delay of the public hearing for the Rule 1403 amendments.

The Committee Members were concerned about taking this item to the Board due to the concerns of industry. Mayor Mitchell asked about the Committee’s authority to request that the February 1 public hearing be postponed. Council Member Benoit

suggested taking this item back through one more working group meeting and that he would discuss postponing the public hearing with the Chair of the Board. Ms. Baird advised that since the item was not on the agenda, Committee direction would not be appropriate. Ms. Whynot commented that staff heard the Committee's comments, and will take industry's concerns under consideration. She will speak with Executive Officer Wayne Nastri and staff about postponing the public hearing if the issues cannot be addressed quickly.

11. Next Meeting Date

The next regular Stationary Source Committee meeting is scheduled for Friday, February 15, 2019.

Adjournment

The meeting was adjourned at 11:33 a.m.

Attachments

1. Attendance Record
2. Notice of Violation Penalty Summary
3. Update on New Source Review Issues for the RECLAIM Transition
4. Home Rule Advisory Group –November 2018 Meeting Minutes and the 2018 Accomplishments and 2019 Goals & Objectives
5. Twelve-month and Three-month Rolling Price of RTCs for Compliance Years 2018 and 2019

ATTACHMENT 1

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE COMMITTEE

Attendance – January 18, 2019

Council Member Ben Benoit (videoconference).....	SCAQMD Governing Board
Dr. Joseph Lyou.....	SCAQMD Governing Board
Supervisor Janice Hahn.....	SCAQMD Governing Board
Mayor Judith Mitchell	SCAQMD Governing Board
Supervisor V. Manuel Perez (teleconference)*	SCAQMD Governing Board
Supervisor Janice Rutherford (videoconference)	SCAQMD Governing Board
Marisa Perez	Board Consultant (Mitchell)
Bill LaMarr	California Small Business Alliance
Curtis Coleman.....	Southern California Air Quality Alliance
Erin Donnette.....	World Energy
Kris Flaig.....	Los Angeles County Sanitation Districts
Kathryn Gleeson.....	World Energy
Rita Loof.....	RadTech
Bridget McCann.....	Western States Petroleum Association
Daniel McGivney	Southern California Gas Company
Bill Pearce.....	Boeing
David Rothbart	Los Angeles County Sanitation Districts
Peter Whittingham.....	Whittingham Public Affairs Advisors
Tammy Yamasaki.....	Southern California Edison
Al Baez	SCAQMD staff
Barbara Baird.....	SCAQMD staff
Amir Dejbakhsh.....	SCAQMD staff
Bayron Gilchrist	SCAQMD staff
Michael Krause.....	SCAQMD staff
Michael Morris.....	SCAQMD staff
Susan Nakamura.....	SCAQMD staff
William Thompson.....	SCAQMD staff
Laki Tisopulos	SCAQMD staff
Jill Whynot	SCAQMD staff

*Listening only (via teleconference)

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
General Counsel's Office**

DRAFT

December 2018 Settlement Penalty Report

<u>Total Penalties</u>	
Civil Settlements:	\$271,150.00
MSPAP Settlements:	\$24,075.00
Total Cash Settlements:	\$295,225.00
Total SEP Value:	\$0.00
Fiscal Year through 12 / 2018 Cash Total:	\$4,727,730.00
Fiscal Year through 12 / 2018 SEP Value Only Total:	\$260,000.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
Civil Settlements						
22911	CARLTON FORGE WORKS	2004 2005 3002	12/14/2018	DH	P64149	\$40,000.00
34389	CHAFFEY COLLEGE	461 1146.2 1415 1470 203 222	12/12/2018	WBW	P62031 P62039	\$19,750.00
4588	HOST MARRIOTT	2202	12/27/2018	NSF	P64817	\$10,000.00
95461	HUNTINGTON MEMORIAL HOSPITAL UNIT NO.02	2202	12/12/2018	SH	P55315	\$2,500.00
43525	J C PENNEY CO <i>(amount includes Suspended Penalty of \$15,000)</i>	2202	12/5/2018	BBB	P60301 P64804	\$21,400.00
141750	NRC ENVIRONMENTAL SERVICES INC	203 (b)	12/12/2018	WBW	P63304	\$70,000.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
171109	PHILLIPS 66 COMPANY/LOS ANGELES REFINERY	402	12/12/2018	NAS	P64601	\$93,500.00
		462			P64602	
		1118			P64603	
		1173			P64604	
		1176			P64607	
		2004			P64611	
		2011			P64612	
		2012			P64613	
		2012 Appen A			P64614	
		3002			P65311	
		41700				
168088	POLYNT COMPOSITES USA INC	2004	12/21/2018	DH	P57884	\$12,500.00
157135	SEAL BEACH POLICE DEPARTMENT	203	12/4/2018	VKT	P64217	\$1,500.00
Total Civil Settlements: \$271,150.00						

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
MSPAP Settlements						
178441	AGROMIN OC CHINO GREEN MATERIAL COMPOST	203(a)	12/7/2018	GC	P66405	\$200.00
151886	ALPHA MATERIALS, INC.	203 (a)	12/7/2018	GC	P66052	\$200.00
800196	AMERICAN AIRLINES, INC,	13 CCR 2460	12/7/2018	GC	P66752	\$1,000.00
156222	AMPARO MEDICAL INC	201 203	12/26/2018	GC	P65761	\$1,040.00
133566	ASBESTOS INSTANT RESPONSE INC	1403	12/7/2018	GC	P65951	\$2,000.00
136077	CLEAN AIR TESTING, INC	461	12/7/2018	TF	P64993	\$800.00
185551	CRITICAL ENVIRONMENTS, INC	203 (a)	12/26/2018	GC	P66602	\$200.00
184317	FAIRMOUNT TERRACE	201 203(a)	12/26/2018	GC	P64128	\$400.00
179460	H&S ENERGY, LLC. H&S 37	461	12/26/2018	GC	P64994	\$880.00
800367	IPS CORPORATION	3002	12/7/2018	GC	P50741	\$1,100.00
172198	JACOS & CO INC/7-ELEVEN STORE 39682A	203(a) 461	12/26/2018	GC	P65726	\$880.00
186808	MBC PROPERTY INVESTMENT INC	1403	12/26/2018	TF	P66703	\$2,050.00
139769	MELROSE 76, GLENROSE INC	461	12/26/2018	TF	P68151	\$800.00
139769	MELROSE 76, GLENROSE INC	461	12/26/2018	TF	P64934	\$500.00
186361	MGA INVESTMENT INC	203 (a)	12/26/2018	TF	P65263	\$800.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
187049	PRESIDO RESIDENTIAL CAPITOL	403	12/26/2018	TF	P63144	\$375.00
32056	R & S OIL CO/ARCO DEALER	461	12/7/2018	TF	P64933	\$500.00
181610	ST MARY & ST MICHAEL, INC., 5FM ONTARIO	461 41960.2	12/26/2018	TF	P66359	\$800.00
139811	SUNNYSIDE 76 CAR CARE CENTER	201	12/7/2018	TF	P65000	\$800.00
180780	TESORO ARCO #42660	203 461	12/7/2018	GC	P66352	\$3,150.00
185347	THE CRANE GUYS, LLC.	203 (a)	12/7/2018	GC	P66601	\$800.00
180854	VILLEGAS POWDER COATING	201 203	12/26/2018	TF	P68051	\$2,400.00
186859	WILCOX & WILCOX	403	12/26/2018	TF	P67202 P67203	\$2,400.00

Total MSPAP Settlements: \$24,075.00

**DISTRICT'S RULES AND REGULATIONS INDEX
FOR DECEMBER 2018 PENALTY REPORT**

REGULATION II - PERMITS

- Rule 201 Permit to Construct
- 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 402 Nuisance
- Rule 403 Fugitive Dust - Pertains to solid particulate matter emitted from man-made activities
- Rule 461 Gasoline Transfer and Dispensing
- Rule 462 Organic Liquid Loading

REGULATION XI - SOURCE SPECIFIC STANDARDS

- Rule 1118 Emissions from Refinery Flares
- Rule 1146.2 Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers
- Rule 1173 Fugitive Emissions of Volatile Organic Compounds
- Rule 1176 Sumps and Wastewater Separators

REGULATION XIV - TOXICS

- Rule 1403 Asbestos Emissions from Demolition/Renovation Activities
- Rule 1415 Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems
- Rule 1470 Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

REGULATION XX - REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

- Rule 2004 RECLAIM Program Requirements
- Rule 2005 New Source Review for RECLAIM
- Rule 2011 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SO_x) Emissions
- Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO_x) Emissions
- Rule 2012
- Appendix A Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO_x) Emissions

REGULATION XXII ON-ROAD MOTOR VEHICLE MITIGATION

Rule 2202 On-Road Motor Vehicle Mitigation Options

REGULATION XXX - TITLE V PERMITS

Rule 3002 Requirements for Title V Permits

CALIFORNIA HEALTH AND SAFETY CODE

41700 Violation of General Limitations

41960.2 Gasoline Vapor Recovery

CALIFORNIA CODE OF REGULATIONS

13 CCR 2460 Portable Equipment Testing Requirements

January 2019 Update on Work with U.S. EPA on New Source Review Issues for the RECLAIM Transition

Staff has been working with U.S. EPA to resolve New Source Review issues as RECLAIM facilities exit to a command and control regulatory structure. 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 New Source Review 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 – December 14, 2018	<ul style="list-style-type: none"> • Discussed RECLAIM holding requirements, future RTC holdings, and overall RTC supply • U.S. EPA is internally discussing staff's initial recommendations and findings
RECLAIM Working Group Meeting – January 10, 2019	<ul style="list-style-type: none"> • Revisited discussion on Potential to Emit (PTE) baseline calculations post-RECLAIM • Discussed how SCAQMD will ensure sufficient offsets are available for RECLAIM facilities post-RECLAIM
Teleconference with U.S. EPA - January 8, 2019	Cancelled due to federal government shutdown
Face-to-face meeting with U.S. EPA staff	Re-scheduled for February 8, 2019



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

HOME RULE ADVISORY GROUP
Wednesday, November 14, 2018
MEETING MINUTES

CHAIR: Dr. Joseph Lyou, SCAQMD Governing Board Member

MEMBERS PRESENT:

Mike Carroll (Regulatory Flexibility Group); Curt Coleman (Southern California Air Quality Alliance); Nan Harrold (Orange County Waste & Recycling); Bill LaMarr (California Small Business Alliance); Dan McGivney (Southern California Gas); Art Montez (AMA International); Patty Senecal (Western States Petroleum Association); and TyRon Turner (Dakota Communications).

The following member participated by conference call: Rongsheng Luo (SCAG).

MEMBERS ABSENT:

Ben Benoit (SCAQMD Governing Board Member); Michael Downs (Downs Energy); Jaclyn Ferlita (Air Quality Consultants); Bridget McCann (Western States Petroleum Association); Dr. Clark Parker (SCAQMD Governing Board Member); David Rothbart (Los Angeles County Sanitation District); Larry Rubio (Riverside Transit Agency); Larry Smith (Cal Portland Cement); Kristen Torres Pawling (County of Los Angeles, Chief Sustainability Office); Bill Quinn (California Council for Environmental & Economic Balance) and Amy Zimpfer (EPA).

OTHER ATTENDEES:

Mark Abramowitz (Board Consultant to Dr. Lyou); Brian Clerico (CARB); Peter Herzog (NAIOP); and John Ungvarsky (EPA).

SCAQMD STAFF:

Philip Fine	Deputy Executive Officer
William Wong	Principal Deputy District Counsel
Jo Kay Ghosh	Health Effects Officer
Philip Crabbe	Community Relations Manager
Pedro Piqueras	Air Quality Specialist
Ann Scagliola	Administrative Secretary

OPENING COMMENTS AND SELF-INTRODUCTIONS

The meeting was called to order at 10:00 a.m. by Dr. Joseph Lyou (Chairman).

APPROVAL OF JULY 2018 MEETING MINUTES

Dr. Lyou asked for comments on the May 9, 2018 meeting minutes. Hearing none, the minutes were approved.

EPA AND FEDERAL ACTIVITIES

John Ungvarsky provided an update on recent U.S. Environmental Protection Agency (EPA) and federal activities.

SCAQMD Related Actions

- Proposed Approval of SCAQMD's AQMP for the 2006 24-hour PM2.5 NAAQS
- 2008 Ozone Plan Proposal Notice
- Finalized Approval of Rule 1113 – Architectural Coatings
- SCAQMD Diesel Emissions Reduction Act (DERA) Awards

Technology Advancement/Incentive Programs

- Targeted Air Shed Program

Federal Actions

- Cleaner Truck Initiative (CTI)
- 2015 Ozone SIP Requirement Update
- DERA National Clean Diesel Funding Assistance Program Updates

Discussion

This portion of the webcast recording was inaudible.

CARB REGULATORY ACTIVITIES

Brian Clerico provided CARB updates on proposed and recent regulatory activities.

Follow-up from September 2018 meeting

- Effects of the California wildfires emissions on attainment goals.

Proposed CARB Board and Regulatory Activities

- Statewide Portable Equipment Registration Program (PERP) and Portable Diesel Engine Air Toxic Control Measure (ATCM) - amendments to take place on November 30, 2018 (amendments summarized by James Aguilar)
- Aliso Canyon Mitigation Agreement - summary of public comments on CARB website.
- Overview of CARB workshops/webinars/meetings for remainder of 2018.

Discussion

Dr. Lyou commented that PM non-attainment events would normally happen in the winter when the PM levels are higher, and it could be an issue since the fire season might also include winter. Mr. Clerico indicated that this could possibly become a disqualification from being an exceptional event, since it may coincide with baseline ambient higher levels that are exceedances.

Bill La Marr inquired about SCAQMD's attainment goal and the wildfire impacts on the readings. Dr. Lyou indicated that there is a process you would claim that it is an exceptional event, and then it would go through the process with EPA for their verification. Dr. Fine added that you would then exclude the exceptional event data point, since it currently only impacts the 24-hour standard.

Dr. Lyou inquired if the PERP and ATCM updates were made to make enforcement easier or to address the lack of reporting. Mr. Aguilar indicated that it was a combination of both.

Bill La Marr inquired about a proposed regulation for reporting criteria of air pollutants and toxic air contaminants workshop scheduled for December 13, 2018, the same day/time as the CARB Board meeting. Mr. Clerico indicated that he would follow-up and provide an update.

LEGISLATIVE UPDATE

Philip Crabbe reported on key legislative updates.

The Legislative Committee held a meeting on November 9, 2018. SCAQMD's State legislative consultants provided written reports on State legislative activities in Sacramento. The meeting was primarily focused on interviewing consultant firms and recommending execution of contracts for SCAQMD's legislative representation in Washington, D.C. These firms are also SCAQMD's current federal legislative representatives in Washington, D.C. The Legislative Committee members interviewed representatives from the following firms:

- Carmen Group, Inc.;
- Cassidy & Associates, Inc.;
- Kadesh & Associates, Inc.; and
- The Glover Park Group

At the conclusion of the interviews, the Committee Members recommended that the Governing Board authorize the execution of contracts with the Carmen Group, Inc., Cassidy & Associates, Inc. and with Kadesh & Associates, Inc. for legislative representation in Washington, D.C.

UPDATE REGARDING LITIGATION ITEMS AND RELATED EPA ACTIONS

William Wong had no updates to report.

UPDATE ON AB 617 IMPLEMENTATION

Dr. Phil Fine gave an update on the SCAQMD AB 617 year-one implementation efforts, which included the key elements for the selected communities and the benchmark milestones for future years.

Discussion

Art Montez inquired about how SCAQMD identified the factors for selecting AB 617 communities. Dr. Fine indicated that we engaged with the communities to identify factors to consider, and then identified the highest ranked communities based on those factors.

TyRon Turner inquired if there is a list of schools, in the South Los Angeles, near industrial areas or freeways. Dr. Fine indicated that a database of schools was used and the inter-active AB 617 maps, on the SCAQMD website, provides this level of detail.

Mr. Turner indicated that at his neighborhood council meetings citizens have raised concerns about the air quality, due to the recent Los Angeles Airport changes in flight patterns. He inquired if air monitors are purchased, will SCAQMD provide training on how to transmit the data. Dr. Fine indicated that the SCAQMD Air Quality Sensor Performance Evaluation Center (AQ Spec) Program does offer deployment and community training, and interested parties should contact the AQ Spec staff for upcoming programs. Dr. Fine added that it is anticipated that there will also be sensor deployment in the selected AB 617 communities. Dr. Lyou commented that the sensors cannot measure everything and suggested considering the PM Purple Air sensors, which have proven to be reliable and accurate for PM.

Mike Carroll commented that he recently toured the AQ Spec setup in the SCAQMD laboratory and recommended that others do the same.

Action Item: Dr. Lyou requested an AQ Spec tour for the Advisory Group, immediately following the January 9, 2019 meeting.

Dan McGivney asked if the AB 617 Community Steering Committee meetings have already occurred. Dr. Fine indicated that two of the three meetings have taken place.

Art Montez asked about the cost of the monitoring systems and if they are difficult to install. Dr. Lyou replied that low-cost sensors cost anywhere from a couple of hundred dollars up to five thousand, depending on what you want to monitor.

Nan Harrold inquired about the December 31, 2023 key milestone deadline for SCAQMD to implement Best Available Retrofit Control Technology (BARCT) and how it relates to the emissions inventory plan. Dr. Fine indicated the BARCT milestones are not necessarily community based but as part of the statute and it will apply to all facilities subject to these rules and will benefit communities throughout the basin. Ms. Harrold further inquired whether this statute applies to everyone in general or are there specific types of equipment. Dr. Fine replied that this specific legislation applies to facilities that are in the statewide greenhouse gas (GHG) cap-and-trade program as of January 1, 2017, as well as other requirements to implement BARCT by the 2023 deadline.

Jo Kay Ghosh indicated that the next AB 617 Community Steering Committee meeting is November 28, 2018, and we are still looking for residents of the Boyle Heights, East Los Angeles and West Commerce area to serve on this committee.

Rongsheng Luo inquired about the \$250M appropriated last year for implementation of AB 617, and how much of that will be allocated to the identified three communities. Dr. Fine indicated that in the first year \$250M was allocated statewide and SCAQMD received approximately \$107M. The legislation was very specific that it had to be spent on Carl Moyer or Prop 1B type programs. SCAQMD was over-subscribed for the Carl Moyer program, so we had many great projects to be funded. Since we did not have the communities selected at that time, SCAQMD made sure that almost 90 percent of the money was spent in disadvantaged communities. This year \$245M was dedicated statewide and SCAQMD does expect to get a portion of this. The guidelines are less restrictive and are open to stationary source incentives. Funding will be prioritized to benefit the selected communities. CARB continues to work on the guidelines for how the \$245M will be spent, and they are still taking comments and feedback for these guidelines. At this time, the money has not been divided up across the districts.

SUBCOMMITTEE STATUS REPORTS

A. Freight Sustainability (Dan McGivney)

An update was provided on the following items.

- December 4, 2018 - CARB workshops on light- and heavy-duty fleet requirements and the advanced clean truck regulation.
- December 4 & 5, 2018 – CARB workshop on the 3-year plan for light-duty vehicles.
- November 29, 2018 - California Freight Advisory Committee meeting

B. Small Business Considerations (Bill La Marr)

An update was provided on the following items.

- Consulted with the Metal Finishing Association and industry, until the adoption of Rule 1369.
- RECLAIM Working Group
- AB 617 Community Steering Committee meetings
- Met with the new EPA Regional Administrator and the Field Office Director of the Los Angeles office.

Bill La Marr requested that staff provide an announcement when rules are adopted to the regulated community, along with a brief summary of the rule content. Dr. Lyou indicated that it used to be standard practice for SCAQMD to provide a notification to the impacted facilities. Dr. Fine said that he would double-check to make sure that this does occur.

C. Environmental Justice and AB 617 Implementation (Curt Coleman)

An update was provided on the following item.

- October 25, 2018 - The CARB Board approved staff's proposed recommendations for the greenhouse gas spending investment priorities for 2018-2019.

D. Climate Change (David Rothbart)

No report was provided.

REPORT FROM AND TO THE STATIONARY SOURCE COMMITTEE

Phil Fine provided a summary of items on the October and November 2018 meeting agendas.

- PAR 1469, 1146, 1146.1, 1146.2, 1403, 1325;
- PR 1110, 1118.1, PR 1407.1;
- AB 617 BARCT Implementation Schedule
- RECLAIM Quarterly Report

The next Stationary Source Committee meeting has been scheduled for December 19, 2018.

APPROVAL OF THE 2019 HOME RULE ADVISORY SCHEDULE

The Home Rule Advisory Group confirmed and Dr. Lyou approved the following meeting schedule for 2019.

January 9	May 8	September 11
March 13	July 10	November 13

Note: All meetings are scheduled to begin at 10:00 a.m. and will be held in Conference Room CC-8.

2018 ACCOMPLISHMENTS AND 2019 GOALS & OBJECTIVES

Dr. Lyou asked for comments the provided Home Rule Advisory Group 2018 Accomplishments and the 2019 Goals and Objectives. Hearing none, the reports were approved.

OTHER BUSINESS

Art Montez inquired about internships available at SCAQMD. Dr. Lyou requested that Mr. Montez be provided with the Summer Governing Board Internship Program link.

Mike Carroll indicated that Latham Watkins has work with the environmental group Ocean Cleanup and to develop a program to remove plastics from the ocean. An award was received for this outstanding project and Mr. Carroll wanted to share the video with others. The link is

<https://www.lw.com:443/news/The-Ocean-Cleanup-2018-Dell-Prize>

PUBLIC COMMENT

There were no comments.

ADJOURNMENT

The meeting was adjourned at 11:44 a.m. The next meeting of the Home Rule Advisory Group is scheduled for 10:00 a.m. on January 9, 2019, and will be held at SCAQMD in Conference Room CC-8.

**South Coast Air Quality Management District
HOME RULE ADVISORY GROUP – Attendance Record – 2018**

	NAME (Term: 1/1/17 - 1/1/2019)	1/10	FEB	3/14	APR	5/9	JUN	7/11	AUG	9/12	OCT	11/14	DEC			
	Board/Member, Business & Community Reps, SCAQMD Staff															
1	Dr. Joseph Lyou, Chair	X	dark	X	dark	X	dark	X	dark	X	dark	X	dark			
2	Mayor Ben Benoit, Vice Chair									A				A		A*
3	Dr. Clark E. Parker, Sr., Governing Board Member			A		A		A		A		A		A	A	A
4	Dr. Philip Fine (Agency Member) - SCAQMD	X		X		X		X		X*		X*		X*	X*	X
5	Zimpfer, Amy (Agency Member) - EPA <i>Representing Elizabeth Adams</i>	T		T*		T		T		T		T		T*	T*	T*
6	Raymond, Johnnie (Agency Member) - CARB <i>Representing Richard Corey</i>	T*		T*		T		T		T		T		T*	T*	T*
7	Chang, Ping (Agency Member) - SCAG <i>Alternate – Rongsheng Luo</i>	T*		T*		T*		T*		T*		T*		T*	T*	T*
8	Carroll, Mike (Business Representative) <i>Alternate – Robert Wyman</i>	A		A		A		A		X		X		X	X	X
9	Coleman, Curtis (Business Representative) <i>Alternate – Susan Stark</i>	X*		X		X		X		A*		X		X	X	X
10	McCann, Bridget (Business Representative) <i>Alternate – Patty Senecal</i>	X*		X		X		X		X		X		X	X	X*
11	La Marr, Bill (Business Representative)	X		X		X		X		X		X		X	X	X
12	McGivney, Dan (Business Representative) <i>Alternate – Lauren Nevitt</i>	X		X*		X		X		A*		A*		A*	A*	X
13	Roberts, Terry (Environmental Representative)	X		X		A*										
14	Quinn, Bill (Business Representative) <i>Alternate – Janet Whittick</i>	T		T*		T*		T		T		T		T	T	A*
15	Downs, Michael (Community Representative - McCallon)	A		A		A*		A*		A*		A*		A*	A*	A*
16	Ferlita, Jaclyn (Community Representative - Lyou)	A		A		X		X		A		X		A	X	A
17	Harrold, Nan (Community Representative - Nelson)	X		A*		X		X		A*		X		X	X	X
18	Montez, Art (Community Representative - Lyou)	A		A		X		X		X		X		X	X	X
19	Rothbart, David (Community Representative - Mitchell)	X		A*		A*		A*		X		X		X	X	A*
20	Rubio, Larry (Community Representative - Ashley)	A*		T		T		T		A*		A*		A*	A*	A*
21	Smith, Larry (Community Representative - Benoit)	X		X		A		A		X		X		A	A	A
22	Pawling Torres, Kristen (Community Representative - Kuehl)	A		X		A		A		X		X		A*	A*	A*
23	Turner, TyRon (Community Representative - Burke)	A		X		X		X		X		X		X	X	X

Attendance Codes					
X	Present	T	Teleconference	A	Absence
X*	Alternate in Attendance	T*	Alternate Teleconference Participation	A*	Absence Excused



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HOME RULE ADVISORY GROUP 2018 ACCOMPLISHMENTS

In 2018 the following important updates were provided to the Home Rule Advisory Group to keep the group informed and engender discussion on important, relevant issues.

- Low-Cost Air Pollution Sensors
- Alternative Technology Infrastructure
- Community Outreach Efforts
- Facility-Based Mobile Source Measures
- AB 617 Implementation

Climate Change

The Climate Change Subcommittee discussed greenhouse (GHG) programs and the potential to minimize duplicative regulatory efforts. The subcommittee tracked regulatory efforts by California Air Resources Board and Environmental Protection Agency to reduce greenhouse gas emissions. The subcommittee monitored the sale of GHG allowances through the auction market and tracked various climate change bills. Regulatory and legislative developments were monitored to ensure that duplicative requirements would not be imposed on stationary sources.

Environmental Justice

The Environmental Justice Subcommittee monitored and reported on environmental justice activities at CARB and OEHHA, including updates to the CalEnviroScreen 3.0. It also monitored and reported on CARB and SCAQMD implementation of AB 617, including updates on CARB's Community Air Protection Program and CARB's identification of communities for initial program activities.

Freight Sustainability

During the past year, the Freight Sustainability Subcommittee has provided discussion and/or updates on the following items:

- The California Freight Mobility Plan;
- The California Freight Advisory Committee Activities;
- The San Pedro Bay Ports Clean Air Action Plan;
- 2018 Advanced Clean Transportation (ACT) Expo;
- Carl Moyer Guidelines;
- Volkswagen Settlement;
- Facility-Based Mobile Source Measures; and
- Caltrans California Freight Advisory Committee activities.

Small Business Considerations

Reducing the Permit Backlog / Permit Streamlining

Throughout 2018, the Small Business Subcommittee participated in meetings of the Permit Streamlining Task Force Subcommittee and contributed to the discussions between the district staff and industry stakeholders about recommending strategies for reducing the volume of backlogged permits and improving the efficiency by which future permits can be processed, approved and issued.

Through a relationship with the California Small Business Alliance, three trade associations (Korean Drycleaners-Laundry Association, California Auto Body Association, and California Independent Oil Marketers Association) agreed to make their members available to begin populating the new E-Permit system with new applications and testing it prior to launch.

NOx RECLAIM Transition to Command and Control

Throughout 2018, the Small Business Subcommittee participated in the working group meetings and contributed to the discussions between the district staff, industry and community stakeholders on issues relating to New Source Review, the equitable “sunsetting” of RECLAIM, and the orderly transition to a command-and-control program.

Rule 1469 (Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing)

Throughout 2018, the Small Business Subcommittee participated in the working group meetings and public workshops, and contributed to the discussions pertinent to the district’s efforts to amend Rule 1469. The Subcommittee continued its participation in these efforts and consulted the leadership of the Metal Finishing Association up to and through adoption of the rule on November 2, 2018.

Rule 1147 (NOx Reductions from Miscellaneous Sources)

The Small Business Subcommittee has reported on the measured pace of rulemaking involved in amending Rule 1147 for the past seven (7) years. On July 7, when the Governing Board finally approved the proposed rule, they did so with stipulations that the staff begin or continue (as appropriate) to accomplish certain tasks that would: 1) mitigate the economic burden of bi-annual emissions testing on the less than one pound NOx/day facilities; 2) eliminate the monopoly that a single low-NOx burner manufacturer has over all other burner manufacturers; and 3) publish an implementation guide that clearly explains to the regulated community how they can comply with the amended rule. Moreover, the Board stressed that their stipulations to staff be carried out with a sense of immediacy, and in collaboration with business stakeholders.

In July the staff met with business community leaders to share and discuss three (3) draft brochures which are intended to inform stationary sources (businesses) that will be required to install low-NOx burners in their equipment, under the provisions of this rule.

The Subcommittee will report on Rule 1147 post-adoption progress, whenever there is something of substance to report.



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HOME RULE ADVISORY GROUP 2019 GOALS AND OBJECTIVES

The Home Rule Advisory Group (HRAG) was established April 14, 1995, by the SCAQMD Governing Board as one element of the Business Clean Air Partnership. The HRAG is a coalition of local business leaders, environmental representatives, regulated agency officials, and air quality regulators dedicated to seeking realistic approaches to attaining clean air goals.

The mission of the Home Rule Advisory Group is to seek consolidation and consistency of federal, state, and local regulations to streamline regulatory compliance while achieving and fulfilling air quality goals and requirements. The group will focus on regulatory proposals and compliance issues that impose duplicative, conflicting or burdensome requirements. These goals will be accomplished by making recommendations including alternatives to the Stationary Source Committee on those issues that the group identifies, as well as pending legislation, litigation and regulatory proposals that have the potential to impose an unreasonable compliance burden on local businesses. The anticipated result is the development of recommendations that support reasonable and efficient approaches to attaining clean air goals.

The term “Home Rule” refers to the process and mechanism of self-governance by local government jurisdictions.

The Home Rule Advisory Group hereby adopts the following 2019 goals and objectives. These goals and objectives may be amended and/or re-prioritized at any time to reflect emerging or changing issues.

The Home Rule Advisory Group will actively examine potential conflicting, duplicative, and/or overly burdensome regulatory activities at local, state, and federal levels, including issues concerning credits and offsets for new sources, relieving air emission burdens on local communities, release of air toxic emissions, best practices to achieve air quality goals, interactions between local air quality and greenhouse gas objectives, etc. The anticipated result is the development of improved strategies to attain clean air goals.

Climate Change

The Home Rule Advisory Group Climate Change Subcommittee will monitor selected local, state, regional federal, and international climate change regulatory, legislative, and non-governmental organizations’ developments. The Climate Change Subcommittee will review selected rulemaking and actions taken by U.S. EPA, ARB, and others with an eye toward harmonization of the regulatory process and to prevent or eliminate duplicative, overlapping, and unnecessarily burdensome requirements, while maximizing co-benefits of emission reductions in criteria pollutants and air toxics.

Environmental Justice

The Home Rule Advisory Group Environmental Justice Subcommittee will continue to monitor and report on the development and implementation of environmental justice programs and cumulative impact assessments by federal, state, and local agencies for purposes of evaluating the consistency of those programs and assessments with federal law, state law, and SCAQMD policies. It will also monitor the implementation of AB 617 by SCAQMD and CARB and seek effective ways to address cumulative and disproportionate impacts while providing regulatory certainty and avoiding duplicative and overlapping requirements. It will continue to monitor developments related to OEHHA's AB2588 Risk Assessment Guidelines and CalEnviroScreen Tool and EPA's EJ Screen Tool for assessing environmental justice communities. Finally, it will continue to provide quarterly updates on how proceeds from CARB's GHG auctions are proposed to be used.

Freight Sustainability

One of the largest sources of NOx emissions in the SCAQMD are mobile sources associated with the movement of freight through our region. Currently, the California Air Resources Board and the SCAQMD are developing and implementing SIP and AQMP mobile source reduction strategies, including efforts to address indirect sources of emissions through regulations, MOUs, incentives, and other facility-based measures. Additionally, the State of California, under the guidance of Caltrans, is responsible for implementation of various transportation plans, including the California State Rail Plan, the California Transportation Plan, the California Freight Mobility Plan and the San Pedro Bay Ports have adopted an updated Clean Air Action Plan and will be continuing plan implementation work. The Subcommittee will monitor and report on these and other related activities during the upcoming year.

Small Business Considerations

The Small Business Considerations Subcommittee will continue to provide small business input in the review and undertaking of air quality-related programs and will assure that recommendations to the Stationary Source Committee by the HRAG reflect a balanced view from small businesses and other HRAG members. The Subcommittee will periodically monitor economic and air modeling data, and report on any significant changes that may occur during 2019 and beyond. The Subcommittee representatives will also continue their involvement in the discussions about RECLAIM.



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Twelve-Month and Three-Month Rolling Average Price of Compliance Years 2018 and 2019 NOx and SOx RTCs

January 2019 Quarterly Report to Stationary Source Committee

Table I

Twelve-Month Rolling Average Price Data for Compliance Year 2018 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2018 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-18	Jan-17 to Dec-17	91.6	\$974,592	3	\$10,639
Feb-18	Feb-17 to Jan-18	91.6	\$974,592	3	\$10,639
Mar-18	Mar-17 to Feb-18	100.7	\$1,041,091	4	\$10,337
Apr-18	Apr-17 to Mar-18	51.6	\$497,246	5	\$9,643
May-18	May-17 to Apr-18	56.6	\$527,075	8	\$9,320
Jun-18	Jun-17 to May-18	53.1	\$502,575	7	\$9,473
Jul-18	Jul-17 to Jun-18	72.6	\$625,883	14	\$8,618
Aug-18	Aug-17 to Jul-18	80.0	\$660,279	19	\$8,251
Sep-18	Sep-17 to Aug-18	86.8	\$698,621	28	\$8,050
Oct-18	Oct-17 to Sep-18	104.3	\$759,871	29	\$7,287
Nov-18	Nov-17 to Oct-18	196.3	\$1,069,361	47	\$5,447
Dec-18	Dec-17 to Nov-18	167.5	\$706,811	49	\$4,219
Jan-19	Jan-18 to Dec-18	270.4	\$1,023,944	57	\$3,786

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 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 Price¹ (\$/ton)
Jan-19	Jan-18 to Dec-18	18.2	\$103,000	5	\$5,646

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 2018 NOx RTCs
(Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2018 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-18	Oct-17 to Dec-17	38.1	\$400,092	1	\$10,500
Feb-18	Nov-17 to Jan-18	38.1	\$400,092	1	\$10,500
Mar-18	Dec-17 to Feb-18	9.1	\$66,499	1	\$7,300
Apr-18	Jan-18 to Mar-18	10.0	\$72,654	3	\$7,295
May-18	Feb-18 to Apr-18	15.0	\$102,483	6	\$6,855
Jun-18	Mar-18 to May-18	5.8	\$35,984	5	\$6,160
Jul-18	Apr-18 to Jun-18	24.6	\$153,137	10	\$6,235
Aug-18	May-18 to Jul-18	27.0	\$157,704	12	\$5,848
Sep-18	Jun-18 to Aug-18	33.7	\$196,046	21	\$5,813
Oct-18	Jul-18 to Sep-18	31.7	\$133,988	15	\$4,233
Nov-18	Aug-18 to Oct-18	116.3	\$409,081	28	\$3,517
Dec-18	Sep-18 to Nov-18	118.9	\$408,282	22	\$3,435
Jan-19	Oct-18 to Dec-18	204.3	\$664,165	29	\$3,251

Table IV

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

Please Note:

Table listing "Twelve-Month Rolling Average Price Data for Infinite-Year Block NOx RTCs" is removed pursuant to October 5, 2018 amendment to Rule 2002, which eliminated the requirement to calculate infinite-year block NOx RTC prices and report to the Governing Board if prices fall below \$200,000 per ton.

Table V

Twelve-Month Rolling Average Price Data for Compliance Year 2018 SOx RTCs
 (Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2018 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-18	Jan-17 to Dec-17	None	-	-	-
Feb-18	Feb-17 to Jan-18	None	-	-	-
Mar-18	Mar-17 to Feb-18	None	-	-	-
Apr-18	Apr-17 to Mar-18	None	-	-	-
May-18	May-17 to Apr-18	None	-	-	-
Jun-18	Jun-17 to May-18	34.2	\$23,974	3	\$700
Jul-18	Jul-17 to Jun-18	34.2	\$23,974	3	\$700
Aug-18	Aug-17 to Jul-18	80.2	\$57,354	5	\$715
Sep-18	Sep-17 to Aug-18	95.2	\$67,854	6	\$713
Oct-18	Oct-17 to Sep-18	163.3	\$135,429	10	\$829
Nov-18	Nov-17 to Oct-18	173.3	\$165,429	11	\$955
Dec-18	Dec-17 to Nov-18	173.3	\$165,429	11	\$955
Jan-19	Jan-18 to Dec-18	173.3	\$165,429	11	\$955

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 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 Price¹ (\$/ton)
Jan-19	Jan-18 to Dec-18	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.