

**CALIFORNIA SAFE SCHOOLS  
COALITION FOR CLEAN AIR  
COALITION FOR A SAFE ENVIRONMENT  
COMMUNITIES FOR A BETTER ENVIRONMENT  
COMMUNITY DREAMS  
INDUSTRIOUS LABS  
EARTHJUSTICE  
EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE  
ROCKY MOUNTAIN INSTITUTE  
SAN PEDRO & PENINSULA HOMEOWNERS COALITION  
SIERRA CLUB  
WEST LONG BEACH ASSOCIATION**

**VIA: ELECTRONIC MAIL ONLY**

**June 1, 2023**

Chair Vanessa Delgado &  
Members of the Board of Directors  
Governing Board Chair  
South Coast Air Quality Management District (South Coast AQMD)  
21865 Copley Drive  
Diamond Bar, CA 91765  
Email: [cob@aqmd.gov](mailto:cob@aqmd.gov)

**RE: Support - Agenda Item 2a: Set Hearing for Proposed Amended Rule 1153.1  
(Commercial Ovens)**

Dear Chair Delgado and Members of the Board:

On behalf of the undersigned organizations, we write regarding the set hearing for Proposed Rule 1153.1. This rule is critical for implementing the 2022 Air Quality Management Plan (AQMP) and the 2016 AQMP, in addition to fulfilling the commitments to transition the RECLAIM program. We support moving forward quickly to adoption of this rule by the August Governing Board meeting at the latest. Advancing zero-emissions in the stationary source space is critical to tackling harmful air pollution.

**I. Commercial ovens are a prime place for electrification.**

This is a perfect category to start advancing zero-emission technologies in the stationary source arena. We particularly appreciate reevaluating BARCT based on the new imperative articulated in the 2022 AQMP. We encourage future rulemakings in the large combustion and commercial combustion categories to proceed with this speed in the coming years. We also appreciate places

where South Coast AQMD staff identifies that electric technologies are actually cheaper than methane-burning technologies (e.g., smokehouse ovens).

## II. Finalizing this rule is critical to transitioning away from RECLAIM.

As implementation of the 2016 AQMP continues, we really appreciate the Governing Board's wise decision to shift the Nitrogen Oxide (NO<sub>x</sub>) and Sulfur Oxide (SO<sub>x</sub>) RECLAIM program to a command-and-control system. Ensuring the largest stationary sources in the South Coast Air Basin actually install state-of-the-art and life-saving pollution controls is critical to providing cleaner air to millions of breathers in the region. With only two landing rules left, the South Coast AQMD is very close to wrapping up this transition.

And wrapping up is crucial. Indeed, the evidence shows facilities in the RECLAIM program pollute our air more than they would if a command-and-control system was in place. In fact, the South Coast AQMD staff's review of the permit database determined that "well over half of the equipment at RECLAIM facilities is currently **not at BARCT**."<sup>1</sup> AQMD Staff's analysis shows that approximately 60% of the equipment in the RECLAIM program does not meet the Best Available Retrofit Control Technology (BARCT) standard. This means the most ozone-polluted basin in the country operates a pollution control system where more than half of the equipment does not even meet standards that staff has determined are achievable when taking into account costs and technological feasibility. Moving forward quickly to complete the RECLAIM transition work is therefore very important.

We look forward to working together to fully transition the agency away from RECLAIM and implementing the AQMP through rules like Proposed Amended Rule 1153.1.

Sincerely,

Adrian Martinez  
Fernando Gaytan  
Earthjustice

Robina Suwol  
California Safe Schools

Chris Chavez  
Coalition for Clean Air

Jesse Marquez  
Coalition for a Safe Environment

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<sup>1</sup> SCAQMD, RECLAIM Transition Plan Version 1.0, at p. vi (March 2018), *available at* <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/regxx/draft-transition-plan-version1-final.pdf?sfvrsn=6> (emphasis added).

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