

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Program Environmental Assessment for:

Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System

VOLUME IV: *Appendices A - J*

January 7, 2011

SCAQMD No. 100909MKSS

State Clearinghouse No. TBD

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APPENDIX A

REVISED PROPOSED RULE 1315

Thirty days before the January 7, 2011 Board Meeting, a revised version of proposed Rule 1315 was made available for public review and is included herein. Revisions to proposed Rule 1315 were made to clarify the rule's requirements to ensure that the rule would operate as intended. SCAQMD staff's evaluation of these revisions concluded that the revisions would not result in any changes to the analysis in the PEA.

**PROPOSED RULE 1315 FEDERAL NEW SOURCE REVIEW TRACKING
SYSTEM**

(a) Purpose

The purpose of this rule is to:

- (1) Maintain the District's ability to continue through December 31, 2030 to issue permits to major sources that obtain offset credits from the Priority Reserve under Rule 1309.1 and/or that are exempt from offsets under Rule 1304;
- (2) Memorialize in rule form the procedures to be followed by the Executive Officer for:
 - (A) Establishing the District's NSR program equivalency with federal NSR offset requirements for such major sources; and
 - (B) Demonstrating that sufficient emission reductions, including previously-untracked emission reductions, existed beyond regulatory requirements under federal law to be used as offset credits to establish that the District's NSR program is equivalent with federal NSR offset requirements for major sources that are exempt from offsets under Rule 1304 or obtain offset credits from the Priority Reserve under Rule 1309.1.

(b) Definitions

- (1) COMMUNITY BANK means the Community Bank as established by Rule 1309.1 – Community Bank, as adopted June 28, 1990 and by Rule 1309.1 – Community Bank And Priority Reserve, as amended May 3, 1991, and became unavailable to applications deemed complete after the December 7, 1995 amendments to Rule 1309.1 – Priority Reserve, which eliminated the Community Bank.
- (2) NET EMISSION INCREASE means the aggregate increase in potential to emit from permitted major and minor stationary sources of a nonattainment air contaminant subject to tracking pursuant to paragraph (c)(2) of this rule that are offset from the Priority Reserve or exempt from offsets pursuant to Rule 1304 minus the aggregate emissions reductions of the same nonattainment air contaminant tracked pursuant to paragraph (c)(3) of this rule over the same time period.

- (3) OFFSET RATIO means the ratio of the quantity of offset credits provided (in pounds per day) to the increase in potential emissions (in pounds per day) requiring offsets.
 - (4) ORPHAN REDUCTION means any reduction in actual emissions from a permitted source within the District resulting from a physical change to the source and/or a change to the method of operation of the source provided the change is reflected in a revised permit for the source and provided such reduction is not otherwise required by rule, regulation, law, approved Air Quality Management Plan Control Measure, or the State Implementation Plan and does not result in issuance of an ERC.
 - (5) ORPHAN SHUTDOWN means any reduction in actual emissions from a permitted source within the District resulting from removal of the source from service and inactivation of the permit without subsequent reinstatement of such permit provided such reduction is not otherwise required by rule, regulation, law, approved Air Quality Management Plan Control Measure, or the State Implementation Plan and does not result in issuance of an ERC.
 - (6) PRIORITY RESERVE means the Priority Reserve as established by the June 28, 1990 adoption of Rule 1309.1 – Community Bank and as amended by the May 3, 1991 amendments to Rule 1309.1 – Community Bank and Priority Reserve and by the December 7, 1995 and subsequent amendments to Rule 1309.1 – Priority Reserve.
 - (7) SHORTFALL means a negative net balance in any of the District offset accounts described in paragraph (c)(1) of this rule as demonstrated through an FDE prepared pursuant to paragraph (d)(3) of this rule or projected pursuant to subdivision (e) of this rule.
- (c) Offset Accounts for Federal NSR Equivalency
- (1) District Offset Accounts for Federal Nonattainment Air Contaminants
The Executive Officer shall maintain a separate District offset account for each federal nonattainment air contaminant excluding PM2.5. The District offset accounts were established as of October 1, 1990 with valid emission reductions that had occurred prior to that date, as reflected in various facilities' negative NSR account balances and that were aggregated as the initial account balances listed in Table A for each nonattainment air contaminant. Any portions of the initial account

balances identified in Table A remaining in the District offset accounts at the end of calendar year 2005 were removed from the District offset accounts as an environmental benefit by the Executive Officer and are not used for purposes of demonstrating equivalency between federal NSR offset requirements and the District’s NSR program. Additional District offset accounts are to be established by the Executive Officer in the event that additional federal nonattainment air contaminants other than PM2.5 or their precursors become subject to federal nonattainment NSR offset requirements, unless by rule the District establishes that Rule 1304 and Rule 1309.1 do not apply to such contaminants or their precursors. If the United States Environmental Protection Agency (EPA) re-designates the District’s attainment status from nonattainment to attainment for a specific air contaminant the Executive Officer may discontinue tracking and reporting the associated District offset account for that air contaminant provided there is a showing in the maintenance plan that the continued use of emissions offsets for that air contaminant is not necessary to maintain attainment for that air contaminant. The District’s NSR program shall be considered equivalent to federal nonattainment NSR offset requirements for a nonattainment air contaminant so long as the procedures specified in this rule are followed and the balance in the District offset account for that air contaminant remains positive.

TABLE A
Initial District Offset Account Balances

Air Contaminant	Initial Account Balance (tons per day)
Volatile Organic Compounds (VOC)	38.46
Nitrogen Oxides (NOx)	23.92
Sulfur Oxides (SOx)	8.04
Carbon Monoxide (CO)	8.45
Particulate Matter (PM10)	2.67

- (2) Tracking of Offset Account Debits for Federal NSR Equivalency
The Executive Officer shall track the amount of emissions and debit from the District offset accounts for the following types of offset allocations or exemptions provided from the District offset accounts for sources located

at major polluting facilities and that are not exempt from the offset requirements of federal nonattainment NSR:

- (A) Emission offsets from the Priority Reserve or Community Bank pursuant to Rule 1309.1; and
- (B) Exemptions from the offset requirements of Rule 1303 – Requirements pursuant to Rule 1304 – Exemptions.

The applicable offset ratios for offsets tracked by the Executive Officer pursuant to this paragraph is 1.2-to-1.0 for extreme nonattainment air contaminants and their precursors and is 1.0-to-1.0 for all other nonattainment air contaminants.

- (3) Tracking of Offset Account Credits for Federal NSR Equivalency
 - (A) The Executive Officer shall track and verify the amount of the following types of emission reductions that have occurred since October 1, 1990 to the District offset accounts:
 - (i) Orphan shutdowns;
 - (ii) Orphan reductions;
 - (iii) ERCs provided as emission offsets for sources located at minor facilities;
 - (iv) The difference between the quantity of ERCs provided for a source located at a major polluting facility at a 1.2-to-1.0 offset ratio pursuant to Rule 1303(b)(2)(A) and the quantity of ERCs required to offset the emission increases at a ratio of 1.0-to-1.0 for all non-attainment air contaminants except extreme nonattainment air contaminants and their precursors.
 - (v) The amount of emission reductions associated with a facility's NSR balance, Community Bank and Priority Reserve allocations, and offset exemptions that is subtracted from the emission reductions quantified pursuant to Rule 1306(c) as part of the Executive Officer's evaluation of an ERC banking application; and
 - (vi) The difference between the actual daily emission reductions calculated pursuant to Rule 1306(c) with and without the BACT adjustment required in Rule 1306(c)(2) as part of the Executive Officer's evaluation of an ERC banking application. This clause applies only in cases

where the Executive Officer demonstrates and EPA concurs that the subtracted amount is not otherwise required by rule, regulation, law, approved Air Quality Management Plan Control Measure, or the State Implementation Plan. This clause is not applicable to emission reductions that occur in the Riverside County portion of the Salton Sea Air Basin (SSAB) or the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin (MDAB).

- (B) The Executive Officer shall quantify and deposit emission reductions that are tracked pursuant to subparagraph (c)(3)(A) of this rule into the District offset accounts according to the following procedures:
- (i) From orphan sources tracked pursuant to clauses (c)(3)(A)(i) or (c)(3)(A)(ii) of this rule at eighty percent of the total or change in the source's NSR permitted emission levels, respectively; and
 - (ii) From ERCs tracked pursuant to clauses (c)(3)(A)(iii), (c)(3)(A)(iv), (c)(3)(A)(v), and (c)(3)(A)(vi) of this rule in the amounts specified pursuant to those clauses.
- (C) The Executive Officer may choose not to track all potential sources of credits in any reporting period if the Executive Officer determines that sufficient credits remain in the District offset accounts to demonstrate equivalency in each reporting period.
- (4) Surplus at the Time of Use
All credits deposited into the District offset accounts pursuant to clauses (c)(3)(A)(i), (c)(3)(A)(ii), and (c)(3)(A)(vi) of this rule shall be discounted by the Executive Officer to ensure that they remain surplus at the time of use. Such discounting shall be performed annually and shall be based on the percentage reduction in overall permitted emissions projected to be achieved as a result of implementation of control requirements that became effective during the previous calendar year for each specific nonattainment air contaminant within the District.
- (5) Tracking Sequence
The tracking elements described in paragraphs (c)(2) through (c)(4) of this rule shall be carried out separately for each District Offset Account in the

following sequence for each reporting period as defined in paragraph (d)(1) of this rule:

- (A) Apply the surplus at the time of use discount described in paragraph (c)(4) of this rule to the offsets tracked pursuant to subparagraph (c)(3)(A) of this rule remaining in the District Offset Account, if any;
- (B) Subtract as much of the aggregate District Offset Account debits tracked and quantified pursuant to paragraph (c)(2) of this rule from the unused Table A initial balance remaining in the corresponding District Offset Account, if any, as possible without resulting in a negative District Offset Account balance;
- (C) Subtract the aggregate District Offset Account debits tracked and quantified pursuant to paragraph (c)(2) of this rule remaining after conducting the subtraction specified in subparagraph (c)(5)(A) of this rule, if any, from the corresponding District Offset Account balance; and
- (D) Add the emission reductions tracked pursuant to subparagraph (c)(3)(A) of this rule for the current reporting period to the corresponding District Offset Account Balance.

The PDE for each reporting period through the 2005 reporting period shall follow the tracking sequence identified in subparagraphs (c)(5)(A), (c)(5)(B), and (c)(5)(C) and the PDE for each reporting period commencing with the 2006 reporting period shall follow the tracking sequence identified in subparagraphs (c)(5)(A) and (c)(5)(C). The FDE for each reporting period shall be completed by adding the results of subparagraph (c)(5)(A) tracking to the PDE results for the same reporting period.

(6) Federal Offset Criteria

Offset account credits used to offset debits pursuant to Rule 1304 or Rule 1309.1, as specified in paragraph (c)(2), are real as specified in subparagraphs (c)(3)(A) and (c)(3)(B), surplus as specified in paragraphs (b)(4), (b)(5), and (c)(4), permanent as specified in paragraphs (b)(4) and (b)(5) and subparagraph (c)(3)(A), quantifiable as specified in paragraphs (c)(1), (c)(3), (c)(4), and (c)(5), and enforceable as specified in paragraphs (b)(4), (b)(5), and (c)(3).

(d) Federal NSR Equivalency Determination Reports**(1) Reporting Periods**

The Executive Officer shall aggregate and track offsets debited from and offsets deposited to the District offset accounts into the following reporting periods for purposes of making periodic determinations of equivalency:

(A) October 1, 1990 through July 31, 1995;

(B) Each of the consecutive twelve-month periods commencing with August 1995 through July 1996 and concluding with August 2003 through July 2004;

(C) August 2004 through December 2005;

(D) Each calendar year from 2006 through 2009; and

(E) Each calendar year from 2010 through 2030.

(2) Preliminary Determinations of Equivalency

Commencing with the calendar year 2010 reporting period, and for each reporting period thereafter, the Executive Officer shall, no later than twelve months after the completion of the reporting period, complete a Preliminary Determination of Equivalency (PDE) with federal nonattainment NSR offset requirements. The Executive Officer shall report the PDE to the District's Governing Board and EPA no later than the second regularly-scheduled monthly Governing Board meeting after the completion deadline for the PDE. The PDE is a conservative assessment of the District offset account balances without accounting for orphan and other credits that become available during the subject reporting period. Each PDE shall include the debit accounting elements identified in paragraph (c)(2) of this rule and the running balances in the District offset accounts at the beginning and at the end of the subject reporting period.

(3) Final Determinations of Equivalency

Commencing with the calendar year 2010 reporting period, and for each reporting period thereafter, the Executive Officer shall complete a Final Determination of Equivalency (FDE) with federal nonattainment NSR offset requirements for each District Offset Account. The FDE for each account shall be completed no later than eighteen months after the completion of the subject reporting period. The Executive Officer shall report the FDE to the District's Governing Board and EPA no later than

the second regularly-scheduled monthly Governing Board meeting after the completion deadline for the FDE for any account(s) for which the PDE did not demonstrate equivalence. Each FDE shall include both the debit and the credit accounting elements identified in paragraphs (c)(2) and (c)(3) of this rule, respectively, and the running balances in the District offset accounts at the beginning and at the end of the subject reporting period. The Executive Officer shall report the FDE for any account(s) for which the PDE did demonstrate equivalence no later than the reporting deadline for the subsequent reporting period's PDE specified in paragraph (d)(2) of this rule.

(4) Early FDE Subsuming PDE

In lieu of preparing both a PDE and an FDE for a single reporting period, the Executive Officer may opt to include the PDE in the FDE for the same reporting period. Such FDEs are subject to the same completion and reporting deadlines as are the PDEs that they subsume.

(e) Projections of District Offset Account Balances

Each PDE report and each FDE report the Executive Officer prepares and presents to the Governing Board and EPA shall also include projections of the District offset account balances at the end of each of the two subsequent reporting periods. The Executive Officer shall make the projections of the District offset account balances based upon the average of the total annual debits and the average of the total annual credits for the five reporting periods most recently included in a PDE or an FDE. Although these projections are to be reported with the results of the PDEs and FDEs, they are separate from the determinations of equivalency and do not constitute an element of the determinations of equivalency.

(f) Equivalency Backstop Provisions

(1) Funding of the Priority Reserve and Issuance of Permits

If the most recent District offset account balances determined by an FDE pursuant to paragraph (d)(3) of this rule demonstrate a shortfall for any air contaminant, the Executive Officer shall:

- (A) Discontinue funding the Priority Reserve for any air contaminant that the most recent FDE has demonstrated does not have a positive balance in its District offset account no later than the

completion deadline for the FDE specified in paragraph (d)(3) of this rule. The Executive Officer may resume funding the Priority Reserve upon completion of an FDE demonstrating that the shortfall no longer exists.

- (B) Discontinue issuing permits to construct and permits to operate that are subject to paragraph (c)(2) Offset Account debits resulting in the further use of Rule 1304 exemptions or Priority Reserve offsets from Rule 1309.1 for the air contaminant that has a shortfall to sources that are major sources of that air contaminant commencing no later than the completion deadline for the FDE demonstrating the shortfall. Additionally, the Executive Officer shall place all major source applications that would otherwise qualify for an offset exemption pursuant to Rule 1304 or to access the Priority Reserve for the air contaminant that has a shortfall on hold until the results of an FDE demonstrating that the shortfall has been rectified have been reported to and approved by the Governing Board unless the applicant elects to provide sufficient ERCs to offset the emissions increase pursuant to Rule 1303(b)(2). The Executive Officer may resume issuance of such permits upon completion of an FDE demonstrating that the shortfall no longer exists.

- (2) Report to the Governing Board: Rectification of a Shortfall
If an FDE demonstrates that a shortfall exists in any of the District offset accounts, or the most recent projected District offset balances calculated pursuant to subdivision (e) of this rule predict that such a shortfall will exist, the Executive Officer shall prepare a report to the Governing Board recommending appropriate action to rectify the shortfall. The Executive Officer shall present this report to the Governing Board no later than six months after the paragraph (d)(2) or (d)(3) completion deadline for the PDE projecting or the FDE demonstrating or projecting the shortfall. The report shall either recommend implementing one or more of the following backstop provisions as needed to correct the shortfall or include an explanation of why it is not necessary to implement any of the following backstop provisions by making a demonstration that the District remains in compliance with federal nonattainment NSR offset requirements on an aggregate basis:

- (A) Provide additional credits to the District offset account(s) that have a shortfall within six months of the FDE that demonstrated the shortfall or the subdivision (e) projection that predicted it. The Executive Officer may obtain such credits by purchasing them, by funding emission reduction projects using quantification protocols approved by EPA, by applying BACT (federal LAER) in excess of federal requirements, or by other methods approved by EPA; and/or
- (B) Propose amendments to Rule 1304 and/or Rule 1309.1 to eliminate certain offset exemptions or to eliminate certain sources' eligibility to receive offsets from the Priority Reserve, respectively.

The report shall also include a proposed timeline for implementation of the actions it recommends.

(g) California Environmental Quality Act Backstop Provisions

(1) Net Emission Increases

(A) Emission Increases at Major and Minor Facilities

In addition to the tracking of offset account debits provided to sources at major polluting facilities pursuant to paragraph (c)(2) of this rule, the Executive Officer shall track all increases in potential to emit that occur at major and minor facilities pursuant to Rule 1304 or Rule 1309.1. Increases in potential to emit at minor facilities tracked pursuant to this paragraph shall not constitute debits from the District offset accounts.

(B) Calculation of Net Emission Increases

The Executive Officer shall calculate the cumulative net emission increase of each nonattainment air contaminant that is tracked pursuant to paragraphs (c)(2) and (c)(3) of this rule from [date of adoption] through the end of the calendar year 2011 reporting period and through the end of each subsequent reporting period no later than the FDE completion deadline for each such reporting period specified in paragraph (d)(3) of this rule.

(C) Reporting Net Emission Increases

The Executive Officer's report to the Governing Board of each FDE commencing with the FDE for the calendar year 2011 reporting period shall include the cumulative net emission

increases from [date of adoption] through the end of the reporting period analyzed by the FDE calculated pursuant to paragraph (d)(3) of this rule. In cases where, pursuant to paragraph (d)(3) of this rule, the Executive Officer reports the credit accounting elements identified in paragraph (c)(3) of this rule with the PDE for the subsequent reporting period, the Executive Officer shall also report the cumulative net emission increase(s) for the same air contaminant(s) with the PDE for the subsequent reporting period. Although net emission increases are to be reported with the results of the FDEs, they are separate from the FDEs and do not constitute an element of the FDEs.

(2) Projections of Cumulative Net Emission Increases

Each PDE report and each FDE report the Executive Officer prepares and presents to the Governing Board and EPA commencing with the reports analyzing the 2011 reporting period shall also include projections of the cumulative net emission increases at the end of each of the two subsequent reporting periods. The Executive Officer shall make the projections of the cumulative net emission increases from both major sources and minor sources based upon the average of the aggregate increase in potential to emit of each nonattainment air contaminant subject to tracking pursuant to paragraph (c)(2) of this rule and the average of the aggregate emissions reductions of the same nonattainment air contaminant for the five reporting periods most recently included in a PDE or an FDE or each of the reporting periods commencing with the 2011 reporting period, whichever is fewer reporting periods. Although these projections are to be reported with the results of the PDEs and FDEs, they are separate from the determinations of equivalency and do not constitute an element of the determinations of equivalency.

(3) Issuance of Permits

If the cumulative net emission increase of a nonattainment air contaminant, as tracked pursuant to subparagraph (g)(1)(B) of this rule and reported with an FDE pursuant to subparagraph (g)(1)(C) of this rule, exceeds the paragraph (g)(4) threshold or is projected pursuant to paragraph (g)(2) of this rule to exceed the paragraph (g)(4) threshold for that air contaminant, the Executive Officer shall discontinue issuing permits to construct and permits to operate that rely on further use of Rule

1304 exemptions or Rule 1309.1 Priority Reserve offsets for that air contaminant to major and minor sources of that air contaminant. Such permit issuance shall cease no later than the paragraph (d)(2) PDE completion deadline or the paragraph (d)(3) FDE completion deadline applicable to the PDE or FDE with which the paragraph (g)(4) threshold exceedance or projected exceedance will be reported to the Governing Board. The Executive Officer shall not resume issuing such permits unless and until the corresponding cumulative net emission increase returns to a level at least ten percent below the threshold for the year in which permitting is to resume, as shown in Table B.

(4) Cumulative Net Emission Increase Thresholds

The cumulative net emission increase thresholds based upon the growth assumptions in the 2007 AQMP for [date of adoption] through December of 2011 and each subsequent year through 2030 are presented in Table B.

TABLE B
Cumulative Net Emission Increase Thresholds
(tons per day)

[date of adoption] through December of	VOC	NOx	SOx	PM10
2011	1.68	0.15	0.04	0.24
2012	2.80	0.25	0.06	0.40
2013	3.91	0.35	0.09	0.55
2014	5.03	0.45	0.11	0.71
2015	6.30	0.53	0.14	0.90
2016	7.58	0.61	0.18	1.09
2017	8.85	0.68	0.21	1.29
2018	10.12	0.76	0.24	1.48
2019	11.39	0.84	0.27	1.67
2020	12.67	0.92	0.30	1.86

[date of adoption] through December of	VOC	NOx	SOx	PM10
2021	13.94	1.00	0.33	2.05
2022	15.21	1.08	0.36	2.24
2023	16.48	1.15	0.39	2.43
2024	17.73	1.27	0.42	2.63
2025	18.98	1.39	0.45	2.83
2026	20.23	1.50	0.48	3.03
2027	21.49	1.62	0.51	3.23
2028	22.74	1.73	0.55	3.43
2029	23.99	1.85	0.58	3.63
2030	25.24	1.96	0.61	3.83

(h) State Implementation Plan Submittals

The Executive Officer shall not submit paragraphs (b)(2) or subdivisions (g) and (h) of this rule to the California Air Resources Board or to EPA for inclusion in the California State Implementation Plan.

(i) Sunset Date for Permit Issuance

This rule shall expire on January 1, 2031.

APPENDIX B

NOP/IS, COMMENTS ON THE NOP/IS, AND RESPONSES TO THE COMMENTS



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

Subject: NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL ASSESSMENT

Project Title: RE-ADOPTION OF PROPOSED RULE 1315 – FEDERAL NEW SOURCE REVIEW TRACKING SYSTEM, AND ADOPTION OF PROPOSED AMENDMENTS TO RULE 1309.2 – OFFSET BUDGET

In accordance with the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD), as the Lead Agency, has prepared this Notice of Preparation (NOP) and Initial Study (IS). This NOP/IS serves two purposes: 1) to solicit information on the scope of the environmental analysis for the proposed project, and 2) to notify the public that the SCAQMD will prepare a Draft Program Environmental Assessment (PEA) to further assess potential environmental impacts that may result from implementing the proposed project.

This letter, NOP, and the attached IS are not SCAQMD applications or forms requiring a response from you. Their purpose is simply to provide information to you on the above project. If the proposed project has no bearing on you or your organization, no action on your part is necessary.

Comments focusing on issues relative to the environmental analysis for the proposed project should be addressed to Mr. Michael Krause at the address shown above, or sent by FAX to (909) 396-3324 or by e-mail to mkrause@aqmd.gov. Comments must be received no later than 5:00 PM on April 15, 2009. If submitting comments, please include your name and phone number. Questions relative to the proposed rules should be directed to Mr. Mohsen Nazemi at (909) 396-2662.

A public Scoping Meeting to solicit comments on the scope of the PEA analysis is scheduled for April 8, 2009. The Public Hearing for the proposed project is currently scheduled for October 2, 2009; however, this date is subject to change. Both meetings will take place at 9:00 a.m. at the SCAQMD Headquarters.

Date: March 17, 2009

Signature: *Steve Smith*

Steve Smith, Ph.D.
Program Supervisor

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

21865 Copley Drive, Diamond Bar, CA 91765-4182

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL ASSESSMENT

Project Title:

Initial Study: Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System, and Adoption of Proposed Amendments to Rule 1309.2 – Offset Budget

Project Location:

South Coast Air Quality Management District: the four-county South Coast Air Basin (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties) and the Riverside County portions of the Salton Sea Air Basin and the Mojave Desert Air Basin.

Description of Nature, Purpose, and Beneficiaries of Project:

The project to be considered involves the re-adoption of proposed Rule 1315 and adoption of proposed amendments to Rule 1309.2. Rule 1315 would codify existing procedures for establishing equivalency with federal offset requirements for the use of internal offsets by operators of various projects subject to Rule 1309.1 – Priority Reserve, Rule 1309.2 – Offset Budget, (which is pending approval by the United States Environmental Protection Agency), and Rule 1304 – Exemptions, and would specify the types of reductions that may be deposited in the SCAQMD's internal offset account, including newly tracked reductions. Rule 1309.2 establishes an offset budget pre-funded by surplus shutdowns from non-major polluting facilities and requires mitigation fees for access to the offset budget. The proposed amendments to Rule 1309.2 would preclude fossil fuel-fired thermal power plants from accessing credits from the Rule 1309.2 Offset Budget other than certain facilities that generate electricity for their own use, update the mitigation fees based on current market prices of emission reduction credits, and clarify the public notice requirements. The analysis in the Initial Study (IS) shows that access to, and use of, emission offsets from the SCAQMD's internal offset accounts could generate potentially significant direct adverse air quality impacts from new or modified facilities using the emission offsets. In addition, significant adverse indirect environmental impacts from siting, constructing, and operating these facilities could occur. Potential direct and indirect impacts from the proposed project will be evaluated in the Draft Program Environmental Assessment.

Lead Agency:

South Coast Air Quality Management District

Division:

Planning, Rule Development and Area Sources

Initial Study and all supporting documentation are available at:

SCAQMD Headquarters
21865 Copley Drive
Diamond Bar, CA 91765

or by calling:

(909) 396-2039

Initial Study is available by accessing the SCAQMD website at:

<http://www.aqmd.gov/ceqa/aqmd.html>

The Public Notice of Preparation is provided through the following:

Los Angeles Times (March 17, 2009) SCAQMD Website SCAQMD CEQA Mailing List and Interested Parties

Initial Study Review Period:

March 17, 2009 – April 15, 2009

Scheduled Public Meeting Dates (subject to change):

Scoping Meeting:	April 8, 2009	9:00 a.m.	SCAQMD Auditorium
Public Hearing	October 2, 2009 (subject to change)	9:00 a.m.	SCAQMD Auditorium

Send CEQA Comments to:

Mr. Michael Krause

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Direct Questions on Amendments:

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Initial Study:

**Re-Adoption of Proposed Rule 1315 – Federal New Source Review Tracking System,
and Adoption of Proposed Amendments to Rule 1309.2 – Offset Budget**

March 17, 2009

SCAQMD No. 090317MK
State Clearinghouse No. TBD

Executive Officer

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CHAPTER 1 - PROJECT DESCRIPTION

Introduction

Legislative Authority

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INTRODUCTION

The South Coast Air Quality Management District (SCAQMD) will be preparing a Program Environmental Assessment (PEA) for the re-adoption of proposed Rule 1315 – Federal New Source Review Tracking System, and the adoption of proposed amendments to Rule 1309.2 – Offset Budget. Proposed Rule 1315 would codify existing procedures for establishing equivalency under federal New Source Review requirements for the use of internal offsets by operators of various projects who either obtain emissions offsets pursuant to Rule 1309.1 – Priority Reserve, or Rule 1309.2 – Offset Budget (which is currently pending approval by the United States Environmental Protection Agency (USEPA) into the State Implementation Plan), or are exempt from the emissions offsets requirements of Rule 1303 – Requirements pursuant to Rule 1304 – Exemptions. Proposed Rule 1315 would also specify the types of reductions that may be deposited into the SCAQMD’s internal offset accounts, including newly-tracked reductions. The term “equivalency” means that the SCAQMD provides sufficient offsets from its internal offset accounts to cover the emission increases from new or modified sources that are exempt from offsets under the SCAQMD rules or that obtain credits from the Priority Reserve or Offset Budget, but are subject to offset requirements under federal law. The PEA will analyze direct and indirect impacts from major sources relying on the SCAQMD’s internal offset accounts for purposes of federal new source review. The PEA will also analyze direct and indirect impacts from both major and minor sources relying on credits from the Rule 1309.1 Priority Reserve, Rule 1309.2 Offset Budget, or Rule 1304 offset exemptions. The analysis in the PEA will include the worst-case assumption that all newly- tracked credits will be used.

The SCAQMD is re-adopting proposed Rule 1315 in response to litigation challenging the SCAQMD’s CEQA determinations for former versions of Rule 1315 and amended Rule 1309.1. In particular, the Los Angeles County Superior Court issued a writ of mandate ordering the SCAQMD to, *inter alia*, set aside its August 2007 adoption of Rule 1315 and amended Rule 1309.1 (“the 2007 Project”). The Court held that the SCAQMD violated CEQA in adopting the rules and also included injunctions that enjoined the SCAQMD from undertaking any actions to implement the 2007 Project pending CEQA compliance and required it to rescind permits it had issued prior to entry of judgment. As a result of the Court’s decision, the SCAQMD is not considering re-amending Rule 1309.1 to allow electric generating facilities access to the SCAQMD’s internal emission offsets in its Priority Reserve. If proposed Rule 1315 is readopted, USEPA may consider approving Rule 1309.2 into the State Implementation Plan (SIP). Rule 1309.2 would become effective upon such approval into the SIP. Implementing Rule 1309.2 would make offsets available to operators of facilities that require external offsets, but do not qualify for Rule 1304 exemptions or allocations from the Priority Reserve. The SCAQMD is proposing to amend Rule 1309.2 to exclude access to offsets by fossil fuel-fired thermal power plants that generate electricity primarily for distribution through the state grid system and to update the mitigation fee for offsets to reflect current market value.

The PEA is a substitute CEQA document, prepared in lieu of an environmental impact report (EIR) [Cal. Code Reg. tit. 14 §15252], pursuant to the SCAQMD’s Certified Regulatory Program (CEQA Guidelines §15251(1) codified in Rule 110). It is being

prepared for proposed Rule 1315 and proposed amended Rule 1309.2 to address the Court’s decision regarding the previous CEQA analysis for Rules 1315 and 1309.1. To provide a conservative analysis, the PEA will include an analysis of direct and indirect impacts from major sources relying on offsets in the SCAQMD’s internal offset accounts to ensure equivalency with federal new source review requirements. The PEA will also include an analysis of direct and indirect impacts from both major and minor sources relying on credits from the Rule 1309.1 Priority Reserve, Rule 1309.2 Offset Budget, or Rule 1304 offset exemptions. The analysis in the PEA will assume that all offsets in the SCAQMD’s accounts, including previously-untracked offsets, will be used.

LEGISLATIVE AUTHORITY

The California Legislature created the SCAQMD in 1977¹ as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin, (this geographic area is referred to hereinafter as the district). The political and geographical boundaries of the district are described in greater detail in the discussion of the project location (below). By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the district². Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP³. The 2003 and 2007 AQMPs concluded that major reductions in emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) were necessary to attain the air quality standards for ozone and inhalable particulate matter (PM₁₀). As part of the strategy to achieve ambient air quality standards, federal and state laws require the development and implementation of air quality permitting programs, commonly known as New Source Review (NSR) programs. Local NSR programs must, at a minimum, comply with the requirements established pursuant to federal and state law. The general requirements of NSR programs include: (1) pre-construction review; (2) installing California best available control technology (BACT)⁴; and (3) mitigating emission increases by providing emission offsets.

The SCAQMD is proposing to re-adopt Rule 1315 and to amend Rule 1309.2 in order to maintain the SCAQMD’s ability to (1) administer its NSR program for major and minor sources, (2) specify the types of surplus emission reductions that may be deposited into the SCAQMD’s internal accounts and used to offset emission increases, (3) memorialize in rule form the accounting procedures used by the SCAQMD to establish equivalency with federal offset requirements, and (4) establish mechanisms that ensure valid emission offsets are available before a source relying on those emission offsets obtains an approved permit, in order to prevent a net increase in criteria and precursor emissions.

¹ The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., Ch 324 (codified at Cal. Health & Safety Code, §§ 40400-40540).

² Cal. Health & Safety Code, § 40460 (a).

³ Cal. Health & Safety Code, § 40440 (a).

⁴ California BACT is comparable to federal lowest achievable emission rate (LAER).

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Proposed Rule 1315 and proposed amended Rule 1309.2 comprise a "project" as defined by CEQA (Cal. Public Resources Code §21000, *et. seq.*). The SCAQMD is the lead agency for the proposed project and will prepare an appropriate environmental analysis pursuant to its certified regulatory program. California Public Resources Code §21080.5 allows public agencies with certified regulatory programs to prepare a plan or other written document in lieu of an environmental impact report once the Secretary of the Resources Agency has certified the regulatory program. The SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110.

CEQA requires that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD has prepared this Initial Study (IS) to identify potential adverse environmental impacts associated with adopting and implementing proposed Rule 1315 and proposed amended Rule 1309.2, which will be further analyzed in a Draft PEA.

The purpose of the IS is to provide the SCAQMD, as lead agency, with the information to use as the basis for deciding whether to prepare a CEQA document identifying significant adverse impacts (EIR or EIR equivalent) or one that does not identify significant adverse impacts (negative declaration or negative declaration equivalent). If the lead agency decides, on the basis of preparing an IS, that an EIR or EIR-equivalent CEQA document is warranted, the IS assists in the preparation of the CEQA document by identifying potentially significant adverse effects, identifying insignificant effects, and explaining the reasons for determining why potentially-significant effects would not be significant. Based on the analysis in this IS, the SCAQMD has concluded that proposed Rule 1315 and the proposed amendments to Rule 1309.2 have the potential to generate significant adverse environmental impacts. Therefore, this IS, along with a Notice of Preparation (NOP), is being circulated for a 30-day public review period to solicit comments from public agencies, and the public in general, on potential impacts from the proposed project. All comments received during the public comment period on the NOP/IS will be responded to and will be included in the Draft PEA.

CEQA includes provisions for program CEQA documents in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, including adoptions of broad policy programs as distinguished from those prepared for specific types of projects (e.g., land use projects) [Cal. Code Reg. tit. 14 (hereinafter referred to as CEQA Guidelines) §15168]. The environmental assessment for the proposed project will be a PEA because it examines the environmental effects of a proposed rule and proposed amended rule, which would establish criteria to govern the conduct of a continuing program (CEQA Guidelines §15168).

A program CEQA document allows consideration of broad policy alternatives and program-wide mitigation measures at a time when an agency has greater flexibility to deal with basic problems of cumulative impacts. A PEA also plays an important role in establishing a

structure within which CEQA reviews of future related actions can effectively be conducted. This concept of covering broad policies in a PEA and incorporating the information contained therein by reference into subsequent EAs for specific projects is known as “tiering” (CEQA Guidelines §15152). A PEA will provide the basis for future environmental analyses and will allow future project-specific CEQA documents, if necessary, to focus solely on the new effects or detailed environmental issues not previously considered. If an agency finds that no new effects could occur, or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the PEA and no new environmental document would be required [CEQA Guidelines §15168(c)(2)].

As explained in more detail in Chapter 2, the Draft PEA will evaluate the use of offsets by the SCAQMD to demonstrate equivalency with federal offset requirements applicable to future projects obtaining permits subject to Regulation XIII New Source Review requirements. Under the CEQA provision for tiering, as explained above, the lead agency may rely on this PEA to form the basis of a project-specific analysis for projects that access the Priority Reserve or Offset Budget, or are exempt from offsets under Rule 1304.

The degree of specificity required in a CEQA document corresponds to the degree of specificity involved in the underlying activity described in the CEQA document (CEQA Guidelines §15146). A CEQA document on a construction project will necessarily be more detailed regarding the analysis of environmental impacts from the project than will be a CEQA document on the adoption of a local general plan, for example, because the effect of a construction project can be predicted with greater accuracy (CEQA Guidelines §15146(a)). Because the level of information regarding some potential impacts related to the siting and consideration of future projects requires making certain assumptions and projections, some of the environmental impact forecasts of cumulative impacts from these projects may be general or qualitative in nature. In certain instances, such as future construction and operation of affected facilities, impacts are quantified or modeled to the degree feasible.

PROJECT LOCATION

Proposed Rule 1315 and proposed amended Rule 1309.2 would apply to proposed projects located in the SCAQMD’s entire area of jurisdiction (i.e., the entire district). The district is an area of 10,473 square miles, consisting of the four-county South Coast Air Basin (Basin) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a sub area of the SCAQMD’s jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains to the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a sub region of both Riverside County and the SSAB and is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 1-1).

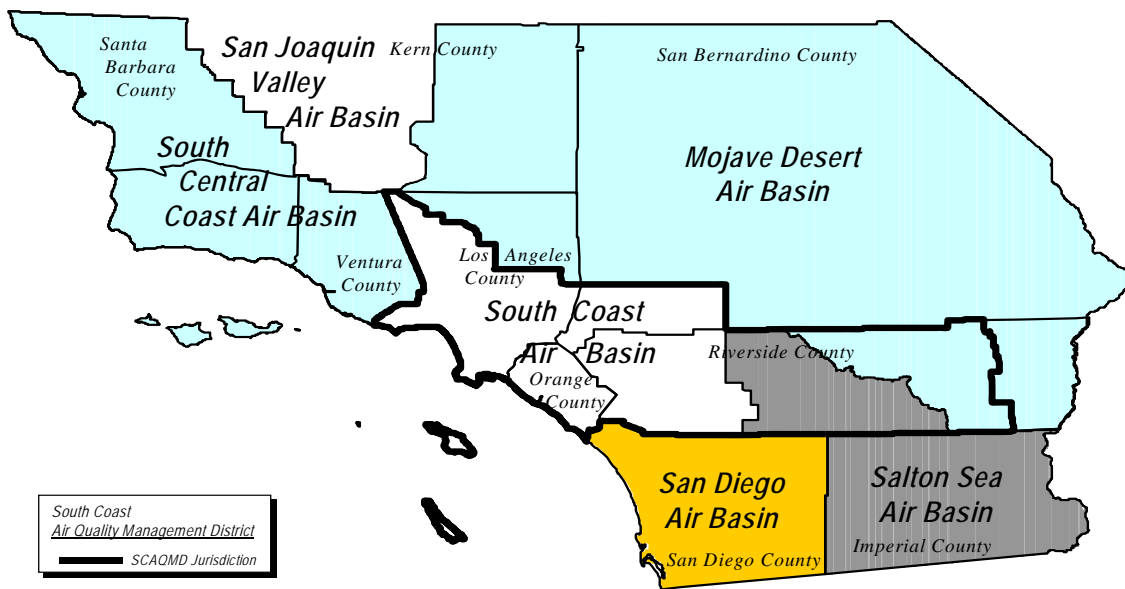


FIGURE 1-1

South Coast Air Quality Management District Boundaries

BACKGROUND

The enactment of the Clean Air Act of 1970 (1970 CAA) required the development of comprehensive federal and state regulations to limit emissions from both stationary (industrial) sources and mobile sources by establishing the following four major regulatory programs affecting stationary sources: 1) the National Ambient Air Quality Standards (NAAQS), 2) State Implementation Plans (SIPs), 3) National Emission Standards for Hazardous Air Pollutants (NESHAPs) and 4) New Source Performance Standards for new and modified stationary sources. Furthermore, enforcement authority of 1970 CAA Act requirements was substantially expanded.

New Source Review

New Source Review, which is part of the CAA, and California statutes require the development and implementation of NSR programs to ensure that the operation of new, modified, or relocated stationary emission sources in nonattainment areas does not impede with the attainment and maintenance of NAAQS and California ambient air quality standards (CAAQS). Local NSR programs must, at a minimum, comply with the federal and state requirements, which include: (1) pre-construction review; (2) compliance with

LAER (SCAQMD’s BACT is equivalent to LAER); and, (3) offsetting of emission increases by providing emission reductions or purchasing emissions reduction credits (ERCs).

Overview of SCAQMD’s New Source Review Program – Federal and California No Net Increase Provisions

SCAQMD’s NSR regulation sets forth pre-construction review requirements for new, modified, or relocated facilities to ensure that the operation of such facilities does not interfere with progress in attaining the NAAQs and that future economic growth within the district is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

In general, the Federal Clean Air Act requires that, among other things, emission increases of nonattainment air pollutants from new and modified federal major sources be offset with emissions reductions. The specific quantity of emission reductions required to offset a specific increase in federal nonattainment emissions is dependent upon the pollutant’s federal nonattainment designation for the air basin in which the increase occurs. In the case of the Basin, the applicable offset ratios are 1.2 pounds of reductions for every 1.0 pound of increase for VOC and NOx⁵ and at least 1.0 pound of reduction for every 1.0 pound of increase for all other nonattainment pollutants and their precursors.

Some aspects of the offset requirements in the SCAQMD’s NSR program (Regulation XIII – New Source Review⁶) are more stringent than the federal offset requirements, while other aspects are less stringent. For example, Regulation XIII is more stringent in that it requires offsets for increases from sources that are not federal major sources (federal minor sources) and an offset ratio of 1.2-to-1.0 for all nonattainment pollutants and their precursors (rather than the federally-required 1.0-to-1.0 for pollutants other than VOC and NOx) and is less stringent in that it includes a variety of exemptions from the offset requirement that do not exist in federal NSR.

In addition to the emissions offset requirements, the SCAQMD’s NSR program also requires that new and modified stationary sources with the potential-to-increase emissions employ BACT, which is comparable to federal LAER, and use modeling to demonstrate that the increase will not “cause a violation, or make significantly worse an existing violation...of any state or national ambient air quality standards at any receptor location in the District.” Provisions for banking emissions reductions as emission reduction credits (ERCs) and for transferring ERCs are also included in Regulation XIII. Each of the existing rules that

⁵ The federally-required offset ratio for VOC and NOx applicable to the Basin, as an extreme nonattainment area, would be 1.5-to-1.0, but SCAQMD’s NSR program requires installation of best available control technology (BACT), which is comparable to federal lowest achievable emission rate (LAER), on new and modified federal non-major sources, making SCAQMD eligible to use a 1.2-to-1.0 offset ratio for VOC and NOx under the federal Clean Air Act.

⁶ SCAQMD’s Regional Clean Air Incentives Market (RECLAIM) program includes its own NSR requirements for new and modified sources of NOx and/or SOx subject to RECLAIM in its Rule 2005 – New Source Review for RECLAIM. PR 1315 is not applicable to RECLAIM emissions, so Rule 2005 is outside the scope of this discussion.

collectively comprise the SCAQMD’s NSR program (Regulation XIII – New Source Review) as it currently exists is summarized in the following bulleted items:

- Rule 1301 – General (adopted October 5, 1979, last amended December 7, 1995): Rule 1301 describes the purpose and applicability of Regulation XIII.
- Rule 1302 – Definitions (adopted October 5, 1979, last amended December 6, 2002): Rule 1302 provides definitions for 42 terms and phrases used throughout Regulation XIII.
- Rule 1303 – Requirements (adopted October 5, 1979, last amended December 6, 2002): Rule 1303 presents the pre-construction review requirements that make up the core of SCAQMD’s NSR program. These requirements include BACT for all new or modified sources with an increase in potential to emit any nonattainment air contaminant, any ozone depleting compound, or ammonia, as well as modeling and emissions offsets for any new or modified source with an increase in potential to emit any nonattainment air contaminant. The rule also includes additional requirements for new major sources and major modifications at existing major sources, including an analysis of alternatives (similar to CEQA requirements for an environmental analysis), demonstration of statewide compliance, and modeling of plume visibility for certain sources of PM10 or NOx located near specified Federal Class I areas.
- Rule 1304 - Exemptions (adopted October 5, 1979, last amended June 14, 1996): Rule 1304 establishes exemptions from Rule 1303 modeling and offset requirements for certain specified categories of projects (e.g., functionally identical replacements, emergency equipment, and air pollution control strategies) and exemptions from Rule 1303 offset requirements for other specified categories of projects (e.g., relocations, concurrent facility modifications, regulatory compliance, replacement of ozone depleting compounds, and new and modified facilities with potential to emit below established thresholds).
- Rule 1306 – Emissions Calculations (adopted October 5, 1979, last amended December 6, 2002): Rule 1306 codifies the basis for quantifying emissions increases and emissions reductions for specified Regulation XIII purposes (e.g., determining applicability of BACT, quantifying the amount of emission offsets required or the amount of ERCs to be banked).
- Rule 1309 – Emission Reduction Credits and Short Term Credits (adopted September 10, 1982, last amended December 6, 2002): Rule 1309 “addresses the application, eligibility, registration, use, and transfer of [ERCs] and Short Term Credits (STCs).” It addresses the conversion of pre-1990 negative balances to ERCs and the conversion of pre-1990 ERCs to post-1990 ERCs, the application process for banking new ERCs and STCs, transfer and use of ERCs and STCs, interpollutant offsets, and inter-basin and inter-district offsets.
- Rule 1309.1 – Priority Reserve (adopted June 28, 1990, last amended August 3, 2007): Rule 1309.1 establishes the Priority Reserve of offsets, specifies the types of essential public service projects that are eligible to obtain offsets from the Priority Reserve, and requires that any facility operator who holds ERCs must use them as offsets prior to obtaining Priority Reserve offsets for the same pollutant.

- Rule 1309.2 – Offset Budget (adopted December 6, 2002): Rule 1309.2 establishes an Offset Budget and the eligibility requirements applicable to project proponents requesting emissions offsets from the Offset Budget, provides guidance to the Executive Officer for implementing the Offset Budget, and specifies the public notice requirements applicable to the use of offsets from the Offset Budget and to the banking and use of STCs. Rule 1309.2 does not become effective unless and until it is approved into the SIP by USEPA.
- Rule 1310 – Analysis and Reporting (adopted October 5, 1979, last amended December 7, 1995): Rule 1310 addresses the Executive Officer’s application completeness determinations, annual reports to the Governing Board “regarding the effectiveness of Regulation XIII in meeting the state and federal NSR requirements,” and public notice requirements for banking ERCs above specified threshold amounts.
- Rule 1313 – Permits to Operate (adopted October 5, 1979, last amended December 7, 1995): Rule 1313 exempts permit renewal, change of operator, or change in Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II from the SCAQMD’s NSR program, specifies that an application for a permit to operate a source that was constructed without a prior permit to construct is considered an application for a permit to construct for purposes of the SCAQMD’s NSR program, establishes a 90-day deadline for facilities to provide emissions offsets requested by the Executive Officer for a permit to operate, provides a window of up to 90 days for a replacement source to operate concurrently with the source it is replacing, specifies the inclusion of NSR permit conditions on permits, and specifies that relaxing or removing a condition limiting mass emissions from a permit is subject to NSR if that condition limited the source’s obligations under NSR.
- Rule 1316 – Federal Major Modifications (Adopted December 2, 2005) Rule 1316 establishes that if a major source demonstrates that “a proposed modification to an existing stationary source would not constitute a Federal Major Modification” the proposed modification is exempt from the analysis of alternatives otherwise required by Rule 1303 and that if an operator of a major stationary source applies for and receives a plantwide applicability limit (PAL), transactions allowable under the PAL are exempt from the analysis of alternatives for the pollutant covered by the PAL.

Offset Tracking – SCAQMD submitted its NSR program to CARB for approval, and incorporation into the SIP. CARB then forwarded the SCAQMD’s NSR program to USEPA. USEPA approved of the SCAQMD’s NSR program in 1996, the SCAQMD has implemented an NSR tracking system to demonstrate programmatic equivalence between its NSR program and the offset requirements of the federal program.

However, USEPA’s approval included the assumption that the SCAQMD would implement a tracking system to account for emission reductions of federal nonattainment air pollutants that occur under the SCAQMD’s NSR program, but that are surplus under federal NSR, as well as emission increases of federal nonattainment pollutants that occur under the SCAQMD’s NSR program, even though the SCAQMD’s NSR program does not comply

with a small number of the specific individual federal NSR’s offset requirements⁷. The purpose of this tracking system is to “continuously show that in the aggregate the SCAQMD is able to provide for the necessary offsets required to meet the appropriate statutory offset ratio” (TSD, p. 16). The TSD further states that “USEPA determined that the District’s proposal to offset all emissions increases with emissions reductions not otherwise required by the Act could be met in the aggregate was consistent with the language of the Act” (p. 16). The tracking system accounts for the differences in emissions reductions achieved through offset requirements under SCAQMD Regulation XIII and federal NSR programs.

As a part of the effort to track emissions offsets SCAQMD staff has prepared a series of reports that track credits and debits from August 1990 through July 2002 and present the remaining balances of credits in the SCAQMD’s federal and California offset accounts. These NSR tracking reports go back to the year 1990 because that was the year when fundamental amendments were made to the SCAQMD’s Regulation XIII. A key source of creditable reductions in these tracking reports was orphan shutdowns of federal major sources and of sources with potential to emit above California’s NNI applicability thresholds. Other creditable reduction sources included “negative NSR balances” resulting from permit actions prior to 1990 and the “BACT discount” currently required by Regulation XIII when banking ERCs.

New Source Review Balance – Prior to 1990, in order to implement its offset requirements, SCAQMD kept a running “NSR balance” for each facility with permitted sources. The NSR balance included an entry for every increase and every decrease in emissions at the facility that resulted from a permit action. The entries in the NSR balance were based on maximum allowable emissions, i.e. the maximum amount of emissions that a source could emit given its physical capabilities and permit limitations and rule requirements. However, the NSR balance was initially determined for each piece of equipment that had not previously undergone an NSR analysis (i.e., pre-NSR equipment) from an actual emissions baseline for that equipment. Any subsequent NSR activity for such equipment was conducted on a potential-to-potential emissions basis. Therefore, a pre-NSR source modified under NSR would be subject to NSR on an actual-to potential emissions basis (i.e., actual pre-modification emissions to potential post-modification emissions)—a very conservative approach.

NSR balance entries had to be quantifiable and enforceable. Balance entries only occurred pursuant to permit applications with sufficient substantiating data to ensure quantifiability after evaluation by SCAQMD engineers, review by supervisory staff pursuant to Regulation XIII rules and implementing policies established by the SCAQMD, and upon issuance of permits or permit modifications that were enforceable under state law.

⁷ USEPA, Region IX Air & Toxics Division Technical Support Document (TSD) for USEPA’s Notice of Final Rulemaking for the California State Implementation Plan South Coast Air Quality Management District New Source Review by Gerardo C. Rios, October 24, 1996.

Existing SCAQMD Rules Affected by Proposed Rule 1315

Proposed Rule 1315 identifies sources of emissions offsets, including orphan shutdowns, surplus reductions, and prior NSR balances. These emission offsets may be used by various permit projects subject to Rule 1304 – Exemptions, Rule 1309.1 – Priority Reserve, and Rule 1309.2 – Offset Budget.

Rule 1304 – Rule 1304 – Exemptions, provides exemptions from specific Regulation XIII requirements, including offset requirements for the following sources:

- replacements of functionally identical sources;
- electric utility steam boiler replacement;
- abrasive blasting equipment;
- emergency non-utility electrical power generation equipment;
- air pollution control strategies, i.e., source modifications for the sole purpose of reducing emissions;
- equipment used exclusively for emergency activities;
- portable equipment;
- portable internal combustion engines;
- intra-facility portable equipment;
- relocations of existing equipment;
- concurrent facility modification;
- resource recovery and energy conservation projects;
- regulatory compliance. i.e., modifications to comply with federal, state, or SCAQMD pollution control requirements;
- regulatory compliance for essential public services;
- replacement of ozone depleting compounds;
- methyl bromide fumigation; And
- new and modified facilities with minimal potential to emit (less than four tons per year of VOC, NO_x, SO_x or PM₀, or less than 29 tons per year of CO).

For each of these exemption types, specific detailed conditions apply.

Rule 1309.1 – The Rule 1309.1 Priority Reserve was established to provide emissions offsets for specific priority sources, including essential public services, innovative technology, and research operations. Essential public services include sewage treatment facilities, prisons, police facilities, fire fighting facilities, schools, hospitals, landfills, water operations and public transit. To draw from the Priority Reserve bank of credits, an essential public service must either provide all required offsets available by modifying sources at the same facility to best available retrofit control technology (BARCT) levels or

demonstrate that no sources within the facility could be modified to BARCT levels to provide offsets.

Rule 1309.2 – In 2002, the SCAQMD adopted an Offset Budget rule (Rule 1309.2 – Offset Budget) as part of the SCAQMD’s NSR program to address some of the shortage problems with ERCs. As adopted, Rule 1309.2 makes the Offset Budget available as a “bank of last resort” to sources that are subject to the SCAQMD’s NSR offset requirements but are unable to obtain sufficient NO_x, SO_x, CO, or PM₁₀ ERCs to provide as emissions offsets on the open market. Offsets are available to such sources from the Offset Budget provided the sources pay a non-refundable mitigation fee based on the quantity and species of offsets obtained from the Offset Budget. Rule 1309.2 also includes the public notice requirements that are applicable to the issuance and use of short term credits (STCs). As part of the discussions between USEPA and the SCAQMD regarding Rule 1309.2, USEPA raised some questions related to the offsets in the SCAQMD’s internal offset accounts for use in the Offset Budget. Among the key issues raised by USEPA are the following:

- creditability of pre-1990 emission reductions, particularly availability of existing records associated with such reductions;
- creditability of reductions resulting from the BACT discount of newly-banked ERCs, since the discount is presumably also used to satisfy the federal surplus at the time of use discount requirement;
- baseline calculation procedures to assure an “actual” baseline;
- surplus adjustment at time of use for credits in the tracking system; and
- consistency of offset use with assumptions in the SIP.

USEPA staff requested that these issues be resolved prior to USEPA considering approval of Rule 1309.2 into the SIP. USEPA staff also requested that the SCAQMD adopt a rule specifying how the tracking of debits and credits into the offset bank would occur in the future. Therefore, USEPA and the SCAQMD staff engaged in a series of discussions to develop a proposed revised NSR Tracking System intended to demonstrate continued programmatic equivalency of the SCAQMD’s NSR program with federal NSR requirements and to address USEPA’s above-described concerns. Rule 1315 – Federal New Source Review Tracking System, as adopted September 8, 2006, was the result of this process.

Legal Challenges to Rules 1309.1 and 1315

Re-adoption of Rule 1315 is necessary because of a judgment in a lawsuit challenging the CEQA analyses for former adoptions of Rule 1315 and former versions of amended Rule 1309.1 – Priority Reserve. The intent of the former versions of Rule 1309.1 was to allow electric generating facilities (EGFs) temporary access to the Priority Reserve, thus, providing scarce emissions offsets to EGFs. In 2006, the first version of Rule 1309.1 incorporating such EGF access to the Priority Reserve was adopted, relying upon a statutory exemption from CEQA pertaining to actions relating to thermal power plants (CEQA Guidelines §15271) and the first version of Rule 1315 was adopted, relying on the general rule exemption [CEQA Guidelines §15061(b)(3)] from CEQA. After the SCAQMD

Governing Board adopted Rule 1315 and PAR 1309.1, a number of environmental and community groups filed a lawsuit challenging the SCAQMD’s determination that these rules were exempt from CEQA.

Prior to the Court reaching a final decision, SCAQMD started the process of readopting Rule 1315 and re-amending Rule 1309.1 to avoid the possibility of the rules being vacated by the judge, which would require readopting Rule 1315 and the amendments to Rule 1309.1 after many months of delay. As part of the re-adoption process, the SCAQMD prepared a PEA that analyzed direct and indirect impacts of the proposed project... The Governing Board certified the PEA and re-adopted Rule 1315 and adopted a revised version of PAR 1309.1 on August 3, 2007 (2007 Project). A number of environmental and community groups filed a lawsuit on the PEA, citing alleged deficiencies in complying with substantive and procedural CEQA requirements.

The Los Angeles County Superior Court issued a writ of mandate ordering the SCAQMD to, *inter alia*, set aside its August 2007 adoption of Rule 1315 and amended Rule 1309.1. The Court held that the SCAQMD’s PEA violated CEQA. The Court also issued injunctions that enjoined the SCAQMD from undertaking any actions to implement the 2007 Project pending CEQA compliance. It also enjoined the SCAQMD to rescind any other approvals or actions taken since the approval of and pursuant to the 2007 Project.

Subsequent to the Court’s decision, the SCAQMD does not intend to pursue re-adopting amendments to Rule 1309.1 that would allow EGFs to access internal offsets in the SCAQMD’s Priority Reserve. Because re-adoption of PR 1315 would make Rule 1309.2 effective following approval into the SIP by USEPA, the PEA will analyze potential adverse direct and indirect impacts from all credits in the internal accounts and the use of offsets from the 1309.2 Offset Budget. The SCAQMD is proposing amendments to Rule 1309.2 that would preclude issuance of Offset Budget offsets to most fossil-fuel fired thermal power plants that generate electricity for distribution in the state grid system, except for any facility with electric generating equipment totaling less than 50 megawatts, where at least 70 percent of the generated electricity is for its own use.

PROJECT DESCRIPTION

The proposed project consists of re-adopting proposed Rule 1315 and adopting the proposed amendments to Rule 1309.2. Together, the proposed changes, re-adoption of Rule 1315 and adoption of the amendments to Rule 1309.2, constitute the “proposed project.” The major components of proposed Rules 1315 and 1309.2 are briefly summarized in the following subsections. Complete copies of proposed Rule 1315 and proposed amended Rule 1309.2 can be found in Appendices A and B, respectively.

Proposed Rule 1315

Proposed Rule 1315 would ensure that exempt sources (under Rule 1304), sources relying on the Offset Budget (under Rule 1309.2), and Priority Reserve sources (under Rule 1309.1) are fully offset to the extent required by federal law by valid emission reductions from the SCAQMD’s internal offset accounts. The proposed rule would achieve this by establishing

what types of reductions are eligible to be used to offset emissions and how those reductions are tracked. The proposed rule would also allow the use of certain previously-untracked reductions to offset emission increases. For example, proposed Rule 1315 would allow the SCAQMD to recognize emission reductions generated from minor source “orphan shutdowns” that were not previously accounted for in the SCAQMD’s federal equivalency demonstrations, to offset emission increases from other sources. Proposed Rule 1315 would also continue to exclude from the applicable equivalency obligation emissions from any new or modified permits that are not required to provide offsets under federal law.

Proposed Rule 1315 would specify procedures to be followed by the Executive Officer to make annual demonstrations that the SCAQMD’s NSR program, in the aggregate, satisfies federal offset requirements for major sources under Clean Air Act section 173. SCAQMD Rule 1304 exempts certain types of projects from NSR offset requirements⁸. Additionally, specific essential public services may obtain offsets from the SCAQMD’s Priority Reserve pursuant to SCAQMD Rule 1309.1. Following SIP approval of Rule 1309.2 by USEPA, other sources might access the SCAQMD’s internal offset accounts under Rule 1309.2. Proposed Rule 1315 would ensure that the SCAQMD’s NSR program is equivalent in the aggregate to the federal nonattainment NSR offset requirements under the CAA, even after the removal from the SCAQMD’s internal offset account of certain pre-1990 credits pursuant to a 2006 agreement with the USEPA. Specific components of proposed Rule 1315 are briefly summarized below.

Purpose (subdivision a)

The purpose of this rule is the following:

- Maintain the ability to issue permits to major sources that obtain offset credits from the Priority Reserve under Rule 1309.1, from the Offset Budget under Rule 1309.2, and/or are exempt from offsets under Rule 1304 [paragraph (a)(1)];
- Memorialize in rule form the accounting procedures used to establish NSR program equivalency with federal NSR offset requirements [subparagraph (a)(2)(A)]; and
- Demonstrate that sufficient emission reductions, including previously untracked emission reductions, existed beyond federal regulatory requirements, and could propose to be used as offsets to establish that the SCAQMD’s NSR program is equivalent to federal NSR offset requirements for major sources exempt under Rules 1304, 1309.1 and/or 1309.2 [subparagraph (a)(2)(B)].

Definitions (subdivision b)

A definition for “Community Bank” [paragraph (b)(1)] has been included for clarification sake.

⁸ Note that, although SCAQMD Rule 1304 exempts certain types of projects from offset requirements, emission increases from these projects are still subject to federal offset requirements pursuant to the Clean Air Act or state no net increase in emissions requirements.

Other proposed definitions added to PR 1315 include:

- “Offset Budget” [paragraph (b)(2)]
- “Offset Ratio” [paragraph (b)(3)];
- “Orphan Reduction” [paragraph (b)(4)];
- “Orphan Shutdown” [paragraph (b)(5)]; and
- “Priority Reserve” [paragraph (b)(6)]

Offset Accounts for Federal NSR Equivalency (subdivision c)

- The Executive Officer shall maintain a separate offset account for each federal nonattainment air contaminant that is subject to federal NSR offset requirements (federal offset account) [paragraph (c)(1)].
- The Executive Officer shall track and debit the eligible types of offset allocations or exemptions (e.g. Priority Reserve, Community Bank, Offset Budget, Rule 1304) located at major polluting facilities not exempt from federal offset requirements [paragraph (c)(2)];
- The Executive Officer shall track and credit the eligible types of emission reductions (e.g., orphan shutdowns, orphan reductions, ERCs provided for sources located at minor facilities) that have occurred since October 1, 1990 to the federal offset accounts [subparagraph (c)(3)(A)].
- The Executive Officer shall deposit emission reductions into the federal offset accounts according to procedures, which make the credits real, quantifiable, permanent and enforceable [subparagraph (c)(3)(B)].
- All unused orphan shutdown and orphan reduction credits in the federal offset accounts shall be discounted annually by the Executive Officer to ensure that they remain surplus at the time of use [paragraph (c)(4)].

Federal NSR Equivalency Determination Reports (subdivision d)

- The Executive Officer shall aggregate tracked offsets provided from the offset accounts into specific reporting periods [paragraph (d)(1)].
- Commencing with calendar year 2008 reporting period, the Executive Officer shall, no later than twelve months after the completion of the reporting period, complete a Preliminary Determination of Equivalency (PDE) with federal nonattainment NSR offset requirements [paragraph (d)(2)].
- Commencing with calendar year 2008 reporting period, the Executive Officer shall, no later than eighteen months after the completion of the reporting period, complete a Final Determination of Equivalency (FDE) with federal nonattainment NSR offset requirements accounting for both debits and credits during the subject reporting period for any account(s) for which the PDE did not demonstrate equivalence [paragraph (d)(3)].

- In lieu of preparing both a PDE and FDE for a single reporting period, the Executive Officer may opt to include the PDE in the FDE for the same reporting period [paragraph (d)(4)].

Projections of Federal Offset Account Balances (subdivision e)

Each PDE and FDE report the Executive Officer prepares and presents to the Governing Board and USEPA shall also include projections of the federal offset account balances at the end of each of the two subsequent calendar year reporting periods.

Backstop Provisions (subdivision f)

- The Executive Officer shall discontinue funding the Priority Reserve for any air contaminant that the most recent FDE has demonstrated does not have a positive balance in its federal offset account [subparagraph (f)(1)(A)].
- The Executive Officer shall discontinue issuing permits to construct or operate that rely on Rule 1304 exemptions, the Priority Reserve, or the Offset Budget for any air contaminant that has a shortfall to sources that are major sources of that air contaminant [subparagraph (f)(1)(B)].
- If an FDE demonstrates that a shortfall exists in any of the federal offset accounts or a subdivision (e) projection predicts a shortfall, the Executive Officer shall prepare a report to the Governing Board recommending implementation of one or more backstop provisions as needed to correct the shortfall or demonstrating that the backstop provisions are not necessary by demonstrating continued compliance with federal NSR offset requirements on an aggregate basis [paragraph (f)(2)].

Please refer to Appendix A for the text of proposed Rule 1315.

Proposed Amended Rule 1309.2

The proposed project also includes proposed amendments to existing Rule 1309.2 – Offset Budget that would preclude most fossil fuel-fired thermal power plants, as described below, from accessing emission offsets from the Rule 1309.2 Offset Budget. Existing Rule 1309.2 establishes an Offset Budget pre-funded by surplus shutdowns from non-major polluting facilities and requires qualified facilities to pay a mitigation fee in order to access the Offset Budget. The proposed amendments to Rule 1309.2 include revising existing mitigation fees, clarifying public notice requirements, and would preclude issuance of Offset Budget credits to fossil fuel-fired thermal power plants that generate electricity for distribution in the state grid system, except for any facility with electric generating equipment totaling less than 50 megawatts, where at least 70 percent of the generated electricity is for its own use.

Offset Budget (subdivision a)

Proposed amended Rule 1309.2 would delete CO from the list of nonattainment air contaminants for which emissions offsets may be obtained from the Offset Budget because CO is no longer a nonattainment air contaminant within the district.

Eligibility Requirements (subdivision b)

Updated mitigation fees are proposed for both permanent credits and short-term credits reflecting the current market value for criteria pollutant emission credits plus a ten percent premium to make the Offset Budget a “last resort” source of emissions offsets and a fifteen percent administrative fee.

The Executive Officer (subdivision c)

The amendments propose adding a prohibition on granting allocations from the Offset Budget to fossil fuel-fired thermal power plants that generate electricity for distribution in the state grid system, except for any facility with electric generating equipment totaling less than 50 megawatts where at least 70 percent of the generated electricity is for its own use [paragraph (c)(12)].

Public Notice (subdivision d)

Exclusion of the conversion of ERCs to short-term credits from the public notice requirements is proposed.

Please refer to Appendix B for the full text of proposed amended Rule 1309.2.

PROJECT OBJECTIVES

CEQA Guidelines §15124(b) requires the project description to include a statement of objectives sought by the proposed project, including the underlying purpose of the proposed project. Compatibility with project objectives is one criterion for selecting a range of reasonable project alternatives and provides a standard against which to measure project alternatives. The proposed project objectives are as follows:

- Maintain the SCAQMD’s ability to continue to administer its new source review program for major and minor sources (i.e., implement Rule 1304 and Rule 1309.1 and, following approval by the USEPA, Rule 1309.2);
- Memorialize in rule form the accounting procedures the SCAQMD uses to establish equivalency for new source review with federal offset requirements;
- Recognize sufficient previously-unused emission reductions beyond those required by applicable regulatory requirements in order to demonstrate federal equivalency for

- sources that are exempt under Rule 1304 or that obtain credits from the Priority Reserve under Rule 1309.1 or the Offset Budget under Rule 1309.2;
- Establish mechanisms to assure that valid offsets are projected to be available in the existing SCAQMD internal offset account before a source relying on such credits is permitted, and establish backstop provisions, thus assuring that increases in emissions resulting from such sources are fully offset.
 - Specify that offset allocations from Rule 1309.2 will not be provided to most fossil fuel-fired power plants, and clarify public notice requirements.

PROJECT ALTERNATIVES

The Draft PEA will discuss and compare the relative merits of alternatives to the proposed project, as required by CEQA and SCAQMD Rule 110, when the project poses significant adverse environmental impacts. Alternatives will include realistic measures for attaining the basic objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative. Alternatives should be designed to mitigate the significant adverse environmental impacts of the project. In addition, the range of alternatives must be sufficient to permit a reasoned choice and need not include every conceivable project alternative. The key issue is whether the selection and discussion of alternatives fosters informed decision making and public participation. A CEQA document need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Suggestions on alternatives submitted by the public will be evaluated for inclusion in the Draft PEA.

SCAQMD Rule 110 does not impose any greater requirements for a discussion of project alternatives in an environmental assessment than is required for an Environmental Impact Report under CEQA. Alternatives will be developed based in part on modifying major components of the proposed project. The rationale for selecting alternatives rests on CEQA's requirement to present “realistic” alternatives; that is, alternatives that can actually be implemented. CEQA also requires an evaluation of a “No Project Alternative.” Written suggestions on potential project alternatives received during the comment period for the Initial Study will be evaluated for feasibility to be considered when preparing the Draft PEA.

ENVIRONMENTAL ANALYSIS

Chapter 2, the environmental checklist, is a standard tool for assisting lead agencies with identifying potential adverse impacts for proposed projects. Chapter 2 identifies some of the overarching assumptions that will be used to analyze potential adverse environmental impacts from proposed Rule 1315 and proposed amended Rule 1309.2. In addition, the approach taken to determine representative facilities that would use the available offsets is provided before the checklist in Chapter 2 under a section called “Environmental Checklist and Discussion.” Environmental topic areas that will be further analyzed in the Draft PEA have been identified in the checklist portion of the chapter, while environmental topic areas that are not expected to be significantly adversely impacted by the proposed project are also

noted, and reasons are provided regarding why significant adverse impacts are not anticipated for these environmental topic areas. The public may comment on any aspect of the Initial Study, including any suggestions for dropping some environmental topic areas from further analysis or adding additional environmental topic areas for further analysis.

CHAPTER 2 - ENVIRONMENTAL CHECKLIST

Introduction

General Information

Potentially Significant Impact Areas

Determination

Environmental Checklist and Discussion

INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the re-adoption of proposed Rule 1315 - Federal New Source Review Tracking System and the adoption of the proposed amendments to Rule 1309.2 – Offset Budget.

GENERAL INFORMATION

Project Title:	Re-Adoption of Proposed Rule 1315 – Federal New Source Review Tracking System and Proposed Amendments to Rule 1309.2 – Offset Budget
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive Diamond Bar, CA 91765
CEQA Contact Person:	Michael Krause (909) 396-2706
Rule Contact Person:	Mohsen Nazemi (909) 396-2662
Project's Sponsor Name:	South Coast Air Quality Management District
Project's Sponsor Address:	21865 Copley Drive Diamond Bar, CA 91765
General Plan Designation:	Not Applicable
Zoning:	Not Applicable
Description of Project:	Proposed Rule 1315 would be used to establish that exempt sources (under Rule 1304), sources relying on the Offset Budget (under Rule 1309.2, pending approval by the USEPA), and Priority Reserve sources (under Rule 1309.1) are fully offset to the extent required by federal law by valid emission reductions from the SCAQMD's internal offset accounts. The proposed rule would establish what types of reductions are eligible to be used to offset emissions. The proposed rule would also allow the use of certain previously untracked reductions that are eligible to offset emission increases. Proposed Rule 1315 would also specify procedures to be followed by the Executive Officer to make annual demonstrations of equivalency with federal offset requirements for major sources under Clean Air Act Section 173. Certain types of projects are not subject to the SCAQMD's New Source Review (NSR) offset requirements because they are exempt under SCAQMD Rule 1304. Additionally, specific priority sources may obtain offsets

from the SCAQMD's Priority Reserve under SCAQMD Rule 1309.1. Proposed Rule 1315 would be used to establish that the SCAQMD's NSR program is in the aggregate equivalent to the federal nonattainment NSR offset requirements under the federal Clean Air Act, even after the SCAQMD removed certain pre-1990 credits from its internal offset account of certain pre-1990 credits pursuant to a 2006 agreement with EPA.

Rule 1309.2 establishes an offset budget pre-funded by surplus shutdowns from non-major polluting facilities, and requires qualified facilities to pay a mitigation fee in order to access the offset budget. The proposed amendments to Rule 1309.2 would update mitigation fees based on current market prices of emission reduction credits, clarify public notice requirements, and preclude issuance of Offset Budget credits to fossil fuel-fired thermal power plants that generate electricity for distribution in the state grid system, except for any facility with electric generating equipment totaling less than 50 megawatts, where at least 70 percent of the generated electricity is for its own use. Rule 1309.2 is an existing rule that will become effective upon adoption of Rule 1315 and SIP approval by USEPA of Rule 1309.2.

Together, the proposed re-adoption of Rule 1315 and adoption of amendments to Rule 1309.2 are referred to in this document as the "proposed project."

Surrounding Land Uses and Setting Not Applicable

Other Public Agencies Whose Approval is Required: Not Applicable

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. Any checked items represent areas that may be adversely affected by the proposed project. An explanation relative to the determination of impacts can be found following the checklist for each area.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use and Planning | <input checked="" type="checkbox"/> Solid/Hazardous Waste |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Transportation./Traffic |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Mandatory Findings |

DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guidelines Section 15252, COULD NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date March 17, 2009

Signature: Steve Smith

Steve Smith, Ph.D.
Program Supervisor

ENVIRONMENTAL CHECKLIST AND DISCUSSION

As stated in Chapter 1, the SCAQMD is proposing to re-adopt proposed Rule 1315 in response to litigation on the 2007 adoption of Rule 1315. Proposed Re-adopted Rule 1315 would specify procedures to be followed by the SCAQMD's Executive Officer to make annual demonstrations of equivalency with federal offset requirements for major sources and specify what types of reductions may be deposited into the SCAQMD's internal accounts. The re-adoption of proposed Rule 1315 may assist permit applicants with complying with offset requirements through increased availability of emissions offsets, the acquiring of which is a critical step in obtaining an approval to begin construction of a project.

In addition to re-adopting Rule 1315, the SCAQMD is also proposing to amend Rule 1309.2, which would revise existing mitigation fees, clarify public notice requirements, and preclude issuance of Offset Budget credits to most fossil fuel-fired thermal power plants that generate electricity for distribution in the state grid system, except for any facility with electric generating equipment totaling less than 50 megawatts where at least 70 percent of the generated electricity is for its own use. Rule 1309.2 is an existing rule that becomes effective upon adoption of Rule 1315 and SIP approval of Rule 1309.2 by USEPA. Together, the proposed re-adoption of Rule 1315 and adoption of amendments to Rule 1309.2, are referred to in this document as the "proposed project."

To address the Los Angeles County Superior Court's ruling regarding the CEQA document prepared for the 2007 project, out of an abundance of caution the environmental analysis for the currently-proposed project will include the conservative assumption that, in the future, all previously tracked offsets and newly-tracked offsets (e.g., offsets obtained from minor source orphan shutdowns and reductions) in the SCAQMD's internal accounts will be used. Under this assumption, the environmental analysis will treat all newly-tracked offsets as new offsets. This assumption is overly conservative for the following reasons.

- The assumption is not supported by SCAQMD's past experience in that prior to the original adoption of Rule 1315 and the Court decision, the SCAQMD could and did issue tracked offsets from its internal accounts and only a limited amount of credits were used per year. Many of the sources of offsets that would be tracked by proposed Rule 1315 were also tracking what was in place prior to the original adoption of Rule 1315.
- If all offsets in the SCAQMD's internal accounts are used, emissions from project relying on these offsets would represent a large portion of the total future emission inventories. Under this scenario it is unlikely that the SCAQMD would be able to demonstrate attainment of all air quality standards, and would therefore be in violation of federal law.

The PEA will include an analysis of the direct and indirect adverse environmental impacts created by the proposed project by permit applicants who would use the offsets in constructing and operating facilities for which the SCAQMD is making emission offsets available from its internal accounts. The analysis will also include the assumption that facilities expected to use future emissions offsets made available as a result of Rule 1315 would more likely be sited, thus, potentially generating construction and operation impacts. In addition to the analysis of the proposed project based on conservative assumptions, the PEA will also include an analysis of

reasonably-foreseeable future environmental impacts associated with siting, constructing and operating future new and modified facilities.

As noted in CEQA Guidelines §15144, preparing a CEQA document necessarily involves some degree of forecasting. For most projects, forecasting impacts is typically done for a specific project or, more generally, a plan, e.g., general or specific plan, where specific activities or land use classifications are known. SCAQMD staff will need to make a number of assumptions to identify projects that may access the SCAQMD's internal accounts in the future. Therefore, in order to evaluate the potential adverse environmental impacts from the use of the offsets by future facilities, the following approach will be taken.

- First, SCAQMD staff will survey past and pending air quality permit applications to identify the types and sizes of facilities that have accessed offsets pursuant to Rule 1309.1, that would be able to access 1309.2 in the future, or exempt projects pursuant to Rule 1304 where the SCAQMD has provided offsets to demonstrate equivalency with federal offset requirements.
- Then, based on the survey of these past and pending permit applications, representative facilities will be identified and established. These representative facilities will be prime examples of affected facilities at various locations in the district where local zoning ordinances or land use designations would allow such commercial or industrial facilities.

To assist in evaluating the potential adverse environmental impacts from representative facilities, existing CEQA documents will be surveyed to identify projects similar to the representative facilities. The corresponding impact analysis in those CEQA documents will then be reviewed to augment the determination of potential impacts from the representative facilities. In addition, the representative projects will be evaluated on their potential to emit air pollutants, including toxics, as well as their location relative to sensitive receptors and effect on other environmental topics. Finally, the analysis will assume that projects will comply with all applicable laws, rules, regulations, codes, ordinances, required standards and land use designations because, otherwise, the facility could not obtain a permit or project approval. The potential environmental impacts of these representative facilities will be analyzed and disclosed in the Draft Program PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:			
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SIGNIFICANCE CRITERIA

The proposed project impacts on aesthetics would be considered significant if:

- The project would block views from a scenic highway or corridor.
- The project would adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare would be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

DISCUSSION

- I. a) - c): **Potentially Significant Impact.** The proposed project specifies regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. Accordingly, the proposed project would have no direct impact on a scenic vista and would not substantially damage scenic resources or substantially degrade the existing visual character or quality of any specific site or its surroundings. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. These projects could result in either new construction or modification of existing structures. Such projects could potentially result in a scale and mass of the built form that is inconsistent with adjoining development, remove trees or historic buildings, or obstruct regionally or locally important views.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future aesthetic impacts associated with the siting of a new facility/project (e.g., obstruction of scenic vistas and resources, degradation of an area’s visual character, etc.). However, in order to identify typical impacts on the scenic and visual quality of an area or a neighborhood that could be expected in the event that development projects or existing facility modifications occur in a sensitive area within the district, representative projects will be identified for the purpose of this assessment. As discussed earlier in this chapter, the representative projects will be established based on past and pending air quality permit applications for facilities that have and/or could have access to Rules 1304, 1309.1 and 1309.2. The aesthetic impacts of these representative facilities will be analyzed in the Draft PEA. In addition, the construction and operation of permitted facilities will result in the emission of air pollutants that could cause impacts on visibility. The PEA will analyze direct and indirect impacts, including visibility, based on the assumption that all newly tracked reductions are used, which could potentially be significant.

- II. d): **Potentially Significant Impact.** There are no components of the proposed project that would directly alter existing work practices or require activities at night. Therefore, the proposed project is not expected to directly create a new source of substantial light or glare that would affect day or nighttime views in an area. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD’s internal offset accounts. These individual projects could result in new development that may create substantial shade or cast long shadows or result in glare and increased nighttime illumination causing inappropriate light spillover.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future light and glare impacts associated with the siting of a new facility/project (e.g., increased illumination in sensitive areas, increased glare along transportation corridors, increased shading in areas that need sunlight, etc.). Representative projects identified for the purpose of this assessment will be used to identify typical light and glare impacts that could be expected in the event that development projects or existing facility modifications occur in a sensitive area within the district. The impacts of these representative facilities related to shadows, light, and glare will be analyzed in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES. Would the project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
the California Resources Agency, to non-agricultural use?			
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

Project-related impacts on agricultural resources would be considered significant if any of the following conditions are met:

- The proposed project would conflict with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project would convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural uses.

DISCUSSION

II. a) - c): **No Impact.** The proposed project specifies regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not directly result in any construction of new buildings or other structures that would convert farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. There are no provisions in the proposed rule or amended rule that would convert farmland to non-agricultural uses, thus, affecting land use plans, policies, or regulations related to agricultural resources. Land use and other planning considerations are determined by local governments, and no land use or planning requirements would be directly or indirectly altered by the proposed project. As such, the proposed project does not have direct or indirect impacts on agricultural resources. While is unknown at this time where a developer may wish to site a particular facility, agricultural land is not expected to be such a location because the action would require a change in zoning of the land and compliance with CEQA requirements. If such zoning would take place, it would likely be for other business reasons.

Thus, these commercial and industrial projects are not expected to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural uses. Nor, are these projects anticipated to conflict with existing zoning by using land zoned for agricultural uses or under the Williamson Act contract for non-agricultural purposes.

Based on the above considerations, significant adverse impacts to agriculture resources are not expected from implementing the proposed project. Since there are no significant adverse impacts, no mitigation measures are required. This environmental topic will not be further evaluated in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
III. AIR QUALITY. Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- h) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

SIGNIFICANCE CRITERIA

Impacts will be evaluated and compared to the significance criteria in Table 2-1. If impacts equal or exceed any of the following criteria, they would be considered significant.

TABLE 2-1
Air Quality Significance Thresholds^a

<i>Mass Daily Thresholds^a</i>		
Pollutant	Construction^d	Operation^e
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
<i>Ambient Air Quality for Criteria Pollutants^b</i>		
NO ₂	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (federal)	
1-hour average annual average		
PM ₁₀	10.4 µg/m ³ (construction) ^c & 2.5 µg/m ³ (operation) 1.0 µg/m ³ 20 µg/m ³	
24-hour average annual geometric average annual arithmetic mean		
PM _{2.5}	10.4 µg/m ³ (construction) ^c & 2.5 µg/m ³ (operation)	
24-hour average		
Sulfate	1 µg/m ³	
24-hour average		
CO	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	
1-hour average 8-hour average		
<i>Toxic Air Contaminants (TACs) and Odor Thresholds</i>		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

^a Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

^b Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 of the *SCAQMD CEQA Handbook* unless otherwise stated.

^c Ambient air quality threshold based on SCAQMD Rule 403.

^d Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

^e For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

KEY: lbs/day = pounds per day ppm = parts per million
µg/m³ = microgram per cubic meter ≥ = greater than or equal to

Greenhouse Gases: SCAQMD's approved¹ interim GHG significance threshold is a tiered approach to determining GHG significance of projects. The first two tiers involve (1) exempting the project because of potential reductions of GHG emissions allowed under CEQA and (2) demonstrating that the project's GHG emissions are consistent with a local general plan. Tier 3 proposes a limit of 10,000 MT CO₂ equivalent (CO₂E) per year for industrial projects as the incremental increase signifying significance. Projects with incremental increases below this threshold will not be cumulatively considerable. Under Tier 5, the project proponent would implement mitigation (GHG reduction projects) to reduce GHG emission impacts to less than the proposed screening level. Tier 4 was not recommended for approval by the Board.

DISCUSSION

SCAQMD's NSR regulation sets forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress toward attainment of the NAAQSs, and that future economic growth within the district is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. Similarly, the SCAQMD's AQMP must demonstrate attainment of all ambient air quality standards (AAQSs), while still accommodating future anticipated population and economic growth.

- III. a): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project is, therefore, consistent with the existing purposes of Regulation XIII to ensure that there are no net increases in emissions from new or modified permitted sources. However, the proposed project would enable the issuance of permits for sources that will emit air contaminants. If it is assumed that all previously untracked offsets (e.g., minor source orphan shutdowns) are used at the same time, and therefore result in emissions, these emissions could hinder the attainment of the National Ambient Air Quality Standards (NAAQA) and California Ambient Air Quality Standards (CAAQS), violating federal and state requirements and, thus, implementation of the air quality management plan. This issue will be further addressed in the Draft PEA.
- III b - e): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project itself does not include development components and, therefore, would not result in direct air quality-related impacts. However, under the revised tracking requirements of proposed Rule 1315,

¹ Approved SCAQMD CEQA GHG Significance Threshold for projects where SCAQMD is Lead Agency was approved by the Governing Board at its December 5, 2008. <http://www.aqmd.gov/hb/2008/December/081231a.htm>

previously untracked offsets could be made available to the SCAQMD's internal offset accounts due to inclusion of offsets generated from orphan shutdown and orphan reduction² of minor sources, emission reduction credits (ERCs) provided as emissions offsets by minor sources, and ERCs provided by major sources in excess of the federally-required 1.0-to-1.0 offset ratio for non-attainment air contaminants other than extreme nonattainment air contaminants and their precursors. Prior to 2006, offsets from the previously-mentioned components were not included in the federal tracking system. In response to the Court decision and to provide a conservative analysis of potential adverse impacts from the proposed project, the analysis will include the assumption that all offsets from the SCAQMD's internal accounts will be used. Further, potential adverse criteria pollutants, air toxic, and greenhouse gases (GHG) emission impacts will be analyzed at the project level for representative projects and cumulatively with other related projects, as necessary, in the Draft PEA.

As discussed on page 2-5, this analysis represents an overly conservative approach because the usage of all credits could violate federal and state requirements by hindering the attainment of all NAAQS and CAAQS, and past experience shows that not all the credits are used.

Criteria Pollutant Emissions

Some individual projects would result in combustion-source criteria pollutant emissions from construction activity through the use of heavy-duty construction equipment and from vehicle trips generated by construction workers/haul trucks traveling to and from the project site, as well as fugitive dust emissions related to site work and general grading. Mobile source emissions, primarily NO_x and diesel particulate, typically result from the use of construction equipment such as graders, scrapers, bulldozers, wheeled loaders, cranes, etc. During structure erection/finishing phases, paving operations and the application of architectural coatings (i.e., paints) and other building materials, reactive organic compounds would be released. Operation-period impacts, which could include criteria pollutant emissions from permitted stationary sources, may also occur. Individual development projects that could indirectly occur as a result of use of emissions offsets from the SCAQMD's offset accounts through proposed Rule 1315 and proposed amended Rule 1309.2 could potentially result in an increase in vehicle trips (both passenger vehicles and trucks) on local roadways, which could in turn result in an increase in operational-period criteria pollutant emissions. As such, the impacts of implementing these rules could:

- Violate an air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of a criteria pollutant for which the Basin is in non-attainment under federal or state AAQS;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Expose sensitive receptors to objectionable odors.

² ORPHAN REDUCTION means any reduction in actual emissions from a permitted source within AQMD resulting from a physical change to the source and/or a change to the method of operation of the source provided the change is reflected in a revised permit for the source and provided such reduction is not otherwise required by rule, regulation, law, approved Air Quality Management Plan Control Measure, or the State Implementation Plan and does not result in issuance of an ERC.

Visibility

These projects, when considered cumulatively, could potentially significantly affect visibility. These and the other issues identified above would be considered potentially significant impacts and further analyzed in the Draft PEA.

Health Effects

Increases in criteria pollutant emissions may result in potential adverse health effects, including cardiovascular, neurological, reproductive and respiratory diseases. These potential health impacts will be further analyzed in the Draft PEA.

Toxic Air Contaminant Emissions

As part of the permit application process, individual projects must demonstrate that localized impacts related to toxic air contaminant (TAC) emissions are less than significant. As such, a permit to operate cannot be issued unless localized impacts are demonstrated to be less than significant. However, these individual projects, when considered cumulatively, could potentially have a significant effect on cancer risk Basin-wide. The potential effect on Basin-wide cancer risk related to cumulative TAC emissions is considered a potentially significant impact and, therefore, will be further analyzed in the Draft PEA.

- III. f): **No Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The various major source projects with emissions increases offset by the Priority Reserve or the Offset Budget or exempt from offsets pursuant to Rule 1304 would be subject to best available control technology (BACT) and modeling, and would receive emissions offsets (at applicable offset ratios) from the SCAQMD's internal offset accounts tracked pursuant to the proposed project. As such, the proposed rule and amended rule would continue to be consistent with NSR and, thus, the existing air quality rules and future compliance requirements would not be weakened. .
- III. g - h): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project itself does not include development components and, therefore, would not result in direct emissions of greenhouse gases (GHGs). However, as discussed in Checklist Response III.b-e above, previously untracked offsets could be made available from the SCAQMD's internal offset accounts, which may result in additional new projects that could be constructed within the district. Thus, many projects that would be eligible for emission offsets from the SCAQMD's internal offset accounts through proposed Rule 1315 and proposed amended Rule 1309.2 would generate GHG emissions that may result in a significant impact on the environment or possibly conflict with an applicable plan, policy, or regulation of an agency

adopted for the purpose of reducing the emissions of GHG. These potential impacts will be analyzed in the Draft PEA.

Individual projects could result in combustion-source GHG emissions from construction activity through the use of heavy-duty construction equipment and from vehicle trips generated by construction workers/haul trucks traveling to and from the individual project sites. In addition, operation-period GHG emissions could result from permitted stationary sources, as well as from vehicular travel to/from the permitted stationary sources related to commercial and employee trips. Potential impacts related to GHG emissions would be considered potentially significant and further analyzed in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflicting with any local policies or ordinances	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
protecting biological resources, such as a tree preservation policy or ordinance?			
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

Impacts on biological resources would be considered significant if any of the following criteria apply:

- The project would result in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project would interfere substantially with the movement of any resident or migratory wildlife species.
- The project would adversely affect aquatic communities through construction or operation of the project.

DISCUSSION

IV a) - b), d): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. Accordingly, the proposed project would not have direct impacts on plant or animal species or the habitats that support them. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD’s internal offset accounts. Generally, typical impacts of a project on biological resources could include loss or destruction of sensitive species or degradation of sensitive habitat. Habitat degradation, interference with movement of wildlife species or migratory fish, and impacts on migratory wildlife corridors, or wildlife nursery sites may occur through grading or excavation, increases in water or air pollutants, increased noise, light, or vibration, interruption of fresh or salt water supplies, reduction in food supplies or foraging areas, or interference with established wildlife movement patterns on or between habitat areas. Projects that create long-term or episodic impacts to natural areas, such as by generating toxic fumes or fugitive dust, could also result in degradation or destruction of a natural habitat.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts

to plant or animal species or the habitats that support them. Representative projects identified for the purpose of this assessment will be used to identify typical impacts on plant and animal species and the habitats that could be expected in the event that development projects or existing facility modifications occur in an ecologically sensitive area within the district. The potential impacts of these representative facilities on sensitive biological resources will be analyzed in the Draft PEA.

- IV. c): **No Impact.** The proposed project would not require or compel various project proponents to directly remove, fill, or interrupt any hydrological system or have a significant impact on federally-protected wetlands. Generally, individual projects eligible for emissions offsets from the SCAQMD’s internal offset accounts under the proposed project would not affect federally-protected wetlands as defined by Section 404 of the Clean Water Act because the projects at representative facilities are not expected to result in the removal, filling, hydrological interruption of protected wetlands, or interruption of fresh or salt water supplies on federally-protected wetlands.
- IV. e) - f): **No Impact.** There are no provisions in the proposed project that would significantly affect land use plans, local policies or ordinances, or regulations. Land use and other planning considerations are determined by local governments, and no land use or planning requirements would be altered by the proposed project. It is expected that various projects subject to proposed Rule 1315 and proposed amended Rule 1309.2 would continue to comply with local land use requirements. Thus, individual projects are not expected to conflict with local policies or ordinances protecting biological resources, habitat conservation plans, and natural community conservation plans due to the loss or destruction of individuals of a sensitive species, or through degradation of sensitive habitat. .

	Potentially Significant Impact	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant Impact	No Impact
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interred outside formal cemeteries?

SIGNIFICANCE CRITERIA

Impacts to cultural resources would be considered significant if:

- The project would result in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

DISCUSSION

V. a) - d): **No Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD’s internal offset accounts. There are existing laws in place that are designed to protect and mitigate potential impacts to cultural resources. Historical or archaeological resource databases are expected to be checked before a new facility is constructed. CEQA Guidelines §15064.5 states that resources listed in the California Register of Historical Resources or in a local register of historical resources are considered “historical resources.” If any human remains are discovered during the construction or modification process, proper notification procedures are expected to take place.

For existing facilities, any existing cultural resources will have already been disturbed so facility modifications are not expected to change any historical or archaeological resource, or destroy a unique paleontological resource or site or unique geologic feature. The extent of any previous earth disturbance reduces the likelihood that previously unknown archaeological or paleontological resources will be encountered during project construction.

While the likelihood of encountering cultural resources is low, it is possible that intact prehistoric deposits may occur below the disturbed horizon for either new construction or modification. If such resources were to be encountered unexpectedly during ground disturbance associated with construction of facilities enabled by proposed project, there would be the potential for adverse impacts. To minimize the risk of adverse impacts occurring, project construction would be required to incorporate a number of standard protective measures during earth-disturbing activities:

- If cultural resources are exposed, a professional archaeologist and a Native American representative will be retained to monitor the subsurface work;
- The archaeological monitor will have the authority to temporarily halt or redirect earth disturbance work in the vicinity of the exposed cultural resources, so the find can be evaluated and mitigated as appropriate; and
- As required by State law, if human remains are unearthed, no further disturbance will occur until the County Coroner has made the necessary findings concerning the origin and disposition of these remains. The Native American Heritage Commission will be notified if the remains are determined to be of Native American descent.

Therefore, cultural resources are not expected be disturbed in any way. As a result, the proposed project has no potential to cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside formal cemeteries.

Based on the above considerations, significant adverse impacts to cultural resources are not expected from implementing the proposed project. Since there are no significant adverse impacts, no mitigation measures are required. This environmental topic will not be further evaluated in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:			
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or substantially altered power or natural gas utility systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

The impacts to energy resources would be considered significant if any of the following criteria are met:

- The project would conflict with adopted energy conservation plans or standards.
- The project would result in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities would impact the current capacities of the electric and natural gas utilities.
- The project would use non-renewable resources in a wasteful and/or inefficient manner.

DISCUSSION

VI. a), e): **No Impact.** While there is a potential need for additional electricity and natural gas to operate representative facilities, the amount is not expected to conflict with adopted energy conservation plans. In addition, new, more efficient equipment and design features should reduce the demand for fuel and electricity. Affected facilities would still be expected to comply with any existing energy conservation standards, to the extent that affected equipment are subject to energy conservation standards.

VI. b) - d): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not directly use non-renewable resources in a wasteful manner, or result in the need for new or substantially altered power or natural gas systems. Additional emissions offsets would be made available in the SCAQMD's internal offset accounts under the proposed project due to the inclusion of offsets from minor source orphan shutdowns and reductions. The proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. Typical impacts on energy from individual projects could include increased energy consumption. To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts to energy resources. Representative projects identified for the purpose of this assessment will be used to identify energy impacts that could be expected in the event that development projects or existing facility modifications occur in areas within the district where additional supplies of electrical power and natural gas are in great demand. The potential impacts of these representative facilities on energy resources will be analyzed in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

Impacts on the geological environment would be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, and compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.

- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures (e.g., liquefaction).
- Other geological hazards would exist which could adversely affect the facility (e.g., landslides and mudslides).

DISCUSSION

VII. a),c), d) - e): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would have no direct impact on geological resources. However, the proposed project would allow the development of individual projects that qualify to receive emission offsets available from the SCAQMD's internal offset accounts. Individual projects could occur along active faults and would be subject to hazards posed by surface fault rupture due to seismic activity. During an earthquake on these active or potentially active faults within the district, potential surface rupture of the fault may result in relative displacement of the ground across the fault surface. Individual projects could be located in areas subject to liquefaction and earthquake-induced landslides. Individual projects may also be subject to impacts resulting from subsidence, soil settlement, and expansive and corrosive soils, all of which have the potential to cause damage to building foundations, structures, pavements, and other landscape features. To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future geology and soils impacts. Representative projects identified for the purpose of this assessment will be used to identify typical geology and soils impacts that could be expected in the event that development projects or existing facility modifications occur in geologically sensitive areas within the district. The potential impacts of these representative facilities on geology and soils will be analyzed in the Draft PEA.

VII. b): **No Impact.** The representative facilities would most likely be located on property that has already been developed, so no potential impacts to existing geophysical conditions are anticipated. New construction will be evaluated for potential substantial soil erosion in order to get a building permit and, thus, would be expected to stabilize the land to assist in evading soil erosion. Therefore, no substantial soil erosion or loss of topsoil is expected from the proposed project. Any soil disturbance that does occur will be subject to the dust control requirements of SCAQMD Rule 403, which would minimize any wind erosion.

VII. e): **No Impact.** The projects at the affected facilities could use septic tanks or alternative waste water disposal systems, however, the projects are not expected to be approved if soils are incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. In addition,

industrial project areas in the district are built-out and typically provide disposal of waste water, thus not requiring the use of septic tanks or alternative waste water disposal systems.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, use, disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			
i) Significantly increased fire hazard in areas with flammable materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SIGNIFICANCE CRITERIA

The impacts associated with hazards would be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

DISCUSSION

VIII.a), b), c), e), and f): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not directly result an increased transport, storage, or use of hazardous materials. Therefore, the proposed project would have no direct hazards or hazardous materials impacts. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD’s internal offset accounts. Individual projects could result in either new construction or modification of existing structures. Impacts could result from exposure of persons or the environment to hazardous materials through activities that could include, but not be limited to, excavation of underground materials, accidental release of handled materials, or leaking tanks,. The extent of the impact would be dependent upon the characteristics of the project being proposed and the specific site conditions related to hazardous materials, which cannot be known until the project or project site is identified. Hazardous materials like asbestos, lead based paints (LBPs), and polychlorinated biphenyls (PCBs) are present in many buildings. During renovation or demolition activities, these hazardous materials may be disturbed.

Disturbance of asbestos, LBPs, and PCBs could expose construction workers and residents to health hazards. However, the USEPA and SCAQMD have regulations intended to minimize asbestos exposure during demolition and renovation activities.

Any future development project occurring as an indirect result of the proposed project that involves demolition activity could result in impacts related to hazardous materials. To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts associated with hazards and hazardous materials. Representative projects identified for the purpose of this assessment will be used to identify typical impacts that could be expected in the event that development projects or existing facility modifications occur on sites or in areas within the district exposed to hazardous materials or hazardous wastes. The potential impacts of these representative facilities related to hazards and hazardous materials will be analyzed in the Draft PEA.

VIII. d): **No Impact.** Government code §65962.5 refers to hazardous waste handling practices at facilities subject to the Resources Conservation and Recovery Act (RCRA). If any future affected facilities are identified on such a list, construction of new or modified permit units enabled by the proposed project is not expected to affect in any way any facility's hazardous waste handling practices.

VIII. g): **No Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. Such activities do not impose any new emergency conditions at the facility that would warrant amendments to adopted emergency response plans and emergency evacuation plans, nor would the proposed project be expected to physically interfere with implementing any adopted emergency response plans and emergency evacuation plans.

VIII.h) - i): **Potentially Significant Impact.** The Uniform Fire Code and Uniform Building Code set standards intended to minimize risks from flammable or otherwise hazardous materials and wildland fires. Local jurisdictions are required to adopt the uniform codes or comparable regulations. Local fire agencies require permits for the use or storage of hazardous materials and permit modifications for proposed increases in their use. Permit conditions depend on the type and quantity of the hazardous materials at the facility or risk of wildland fire to the property. Permit conditions may include, but are not limited to, specifications for sprinkler systems, electrical systems, ventilation, and containment. The fire departments make annual business inspections to ensure compliance with permit conditions and other appropriate regulations. Consequently, local fire departments ensure that adequate permit conditions are in place to protect against potential risk of upset from the use of hazardous materials and wildland fires.

Although the proposed project would not result in direct impacts involving wildland fires or fire hazards from flammable materials, development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts through proposed Rule 1315 and amended Rule 1309.2 could result in indirect impacts. Individual development projects could be located within a Wildfire Hazard Area or could require storage of flammable materials, such as diesel and flammable chemicals, during construction or operation. To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts associated with hazards and hazardous materials and wildland fires. Representative projects identified for the purpose of this assessment will be used to identify typical hazards and hazardous materials and wildland fires impacts that could be expected in the event that development projects or existing facility modifications occur in areas within the district that are subject to wildland fires or fire hazards. The potential impacts of these representative facilities associated with wildland fires and fire hazard areas will be analyzed in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY.			
Would the project:			
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
site?			
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
o) Require in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SIGNIFICANCE CRITERIA

Potential impacts on water resources would be considered significant if any of the following criteria apply:

Water Quality:

- The project would cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project would cause the degradation of surface water substantially affecting current or future uses.
- The project would result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system would not be sufficient to meet the needs of the project.
- The project would result in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project would result in alterations to the course or flow of floodwaters.

Water Demand:

- The existing water supply would not have the capacity to meet the increased demands of the project, or the project would use a substantial amount of potable water.
- The project would increase demand for water by more than five million gallons per day.

DISCUSSION

IX. a): **No Impact.** The affected facilities are not expected to violate any water quality standards or waste discharge requirements because, if a violation was to occur, the affected facility would not get the approval or permit for the project and, if permit was already obtained, would be subject to applicable agency enforcement and penalty actions.

IX. b) - f): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would have no direct impact on hydrology and water quality. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. These individual projects could result in runoff of sediments, construction materials, and accidental spills of fuels and/or lubricants during construction activities that could adversely affect water quality. These individual projects may be required to comply with National Pollution Discharge Elimination System (NPDES) regulations and implement an associated project-specific Storm Water Pollution Prevention Plan (SWPPP) and Source Control Program that would detail best management practices (BMPs) during construction activities, as well as post-construction operational activities. Compliance with existing regulations would minimize potential water quality impacts during construction and operation of each individual project. Construction could also result in the increase in impervious surfaces within the district, which could lead to increased surface runoff from the individual project sites. This increase in runoff could potentially affect existing or planned stormwater drainage systems.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future hydrological and water quality impacts. Representative projects identified for the purpose of this assessment will be used to identify typical hydrological and water quality impacts that could be expected in the event that development projects or existing facility modifications occur in hydrologically sensitive areas (e.g., located adjacent to water bodies, flood zone areas, etc.) within the district. The impacts of these representative facilities on hydrology and water quality will be analyzed in the Draft PEA.

IX. g): **No Impact.** The proposed project would not involve construction of housing or affect residential siting so it would not result in placing housing in 100-year flood hazard areas that could create new flood hazards.

IX. h) - j): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would have no direct impact on flooding and inundation. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. Depending on the location of each affected commercial or industrial project, the site may be located within a 100-year flood hazard area, as designated by the Federal Emergency Management Agency (FEMA), an inundation zone, a coastal area, or a hillside, which could result in potential impacts related to flooding, inundation, or mudslides.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future flooding, inundation, and mudslide impacts. Representative projects identified for the purpose of this assessment will be used to identify typical impacts that could be expected in the event that development projects or existing facility modifications occur in areas within the district that are subject to flooding, inundation, and/or mudslide. The potential impacts of these representative facilities related to flooding, inundation, and mudslide will be analyzed in the Draft PEA.

- IX. k): **No Impact.** Affected facilities are expected to comply with existing wastewater treatment requirements or conditions from any applicable Regional Water Quality Control Board or local sanitation district because violating the requirements or conditions would subject the affected facility to enforcement and penalty actions, which could jeopardize the approval or permit allowing the facility to operate.
- IX. l) - o): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would have no direct impact on water, wastewater treatment, and stormwater drainage facilities. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. Each development project would be required to comply with all federal, state, and local statutes and regulations related to all water, wastewater, and storm drainage facilities. Depending on the location of each development project, the site may be located in an area with deficient water or wastewater treatment facilities, insufficient water supplies, or substandard stormwater drainage facilities, which could result in potential impacts on these facilities and services.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts to water, wastewater, and storm drainage facilities. Representative projects identified for the purpose of this assessment will be used to identify typical water, wastewater, and storm drainage facilities impacts that could be expected in the event that development projects or existing facility modifications occur in areas within the district that have deficient water or wastewater treatment facilities, insufficient water supplies, or substandard stormwater drainage facilities. The potential impacts of these representative facilities on water, wastewater, and storm drainage facilities will be analyzed in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

- Land use and planning impacts would be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

DISCUSSION

X. a) - c): **No Impact.** There are no provisions in the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments, and no land use or planning requirements would be directly altered by the proposed project. Individual development projects subject to the proposed rule and amended rule would still be required to comply with local land use requirements. Facilities will need to comply with any requirements and land use designations in order to obtain any necessary approval or permit for the project. Therefore, there would be no direct or indirect impacts on land use and planning.

Based on the above considerations, significant adverse impacts to land use and planning are not expected from implementing the proposed project. Since there are no significant adverse impacts, no mitigation measures are required. This environmental topic will not be further evaluated in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

Project-related impacts on mineral resources would be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The project would result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

DISCUSSION

XI. a) - b): **No Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. There are no provisions in the proposed project that would directly result in the loss of availability of a known mineral resource of value to the region and the residents of the state, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based on the above considerations, significant adverse impacts to mineral resources are not expected from implementing proposed project. Since there are no significant adverse impacts, no mitigation measures are required. This environmental topic will not be further evaluated in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SIGNIFICANCE CRITERIA

Impacts on noise would be considered significant if:

- Construction noise levels would exceed local noise ordinances or, if the noise threshold is currently exceeded, project noise sources would increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels would be considered significant if they would exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels would exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project

noise sources would increase ambient noise levels by more than three dBA at the site boundary.

DISCUSSION

XII. a). **No Impact.** Although the representative facilities could generate an increase in noise from their new or modified equipment, they are not expected to expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance because violating such standards and ordinances would subject the affected facilities to local jurisdiction enforcement and penalty actions, which could jeopardize further operation of the facility.

XII. b) - f): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would have no direct noise impacts. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. These individual projects could result in an increase in vehicle trips (both passenger vehicles and trucks) on local roadways, which in turn could result in an increase in noise levels. The individual projects could also cause noise impacts from operation of heavy machinery, cooling towers, HVAC units, etc. Additionally, construction noise could be generated by the broad array of powered, noise-producing mechanical equipment typically used in the construction phase. Because the district encompasses a large area, the potential exists for sensitive receptors to be located within 500 feet of a construction area although it is not possible to determine what specific effects could occur, if any, in the absence of specific information relating to future development activities.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future noise impacts from the construction and operation of various projects resulting from the individual projects accessing the SCAQMD's internal offset accounts under the proposed project. Representative projects identified for the purpose of this assessment will be used to identify typical noise impacts that could be expected in the event that development projects or existing facility modifications occur in noise-sensitive areas within the district. The potential impacts of these representative facilities related to noise will be analyzed in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:			
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

The impacts of the proposed project on population and housing would be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing would exceed the existing supply.
- The proposed project would produce additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

DISCUSSION

XIII.a) - c): **No Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. District population will not be affected directly or indirectly as a result of adopting and implementing the proposed project. The proposed project would not directly result in the creation of new uses and facilities that would affect population growth or induce growth. The proposed project is not expected to appreciably affect employment opportunities and, as such, is not expected to result in the relocation or redistribution of population or growth inducement.

Based on the above considerations, significant adverse impacts to population and housing are not expected from implementing the proposed project. Since there are no significant adverse impacts, no mitigation measures are required. This environmental topic will not be further evaluated in the Draft PEA.

Potentially Significant Impact	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES. Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- | | | | |
|-----------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Fire protection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Police protection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Other public facilities? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SIGNIFICANCE CRITERIA

- Impacts on public services would be considered significant if the project would result in substantial physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

DISCUSSION

XIV.a), b) and e): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not directly result in the creation of new uses and facilities that would directly result in significant impacts to public services. The proposed project would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD’s internal offset accounts. The representative facilities are commercial or industrial projects that could require an increase in the demand for public services, which, depending on their location, may require the construction of new public service facilities or expansion of existing public services facilities. Specifically,

operation of the future development could result in an increased demand for fire or police services. Further, construction activities associated with new development could affect emergency vehicle access and delay police and fire response times due to additional traffic congestion.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts to public services from the construction and operation of various projects subject to the proposed project. Representative projects identified for the purpose of this assessment will be used to identify typical public services impacts that could be expected in the event that development projects or existing facility modifications occur in areas within the district that may have the need for new or upgraded public facilities to maintain acceptable levels of service, response times, or other performance standards. The potential impacts of these representative facilities on public services will be analyzed in the Draft PEA.

XIV. c) and d): **No Impact.** Because the proposed project has no affect on population growth in the district (see “Population and Housing”), no direct or indirect effects on schools, parks or other recreational facilities are foreseen as a result of implementing the proposed project.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XV. RECREATION.			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

The impacts to recreation would be considered significant if:

- The project would result in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project would adversely affect existing recreational opportunities.

DISCUSSION

XV. a) - b): **No Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. Thus, the proposed project would not directly result in an increase in the use of existing neighborhood and regional parks or other recreational facilities, or include recreational facilities, or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. With regard to the new development projects, the proposed project is determined to have no affect on population growth in the district (see “Population and Housing”), therefore, no direct or indirect effects on recreation or recreational opportunities are foreseen as a result of implementing the proposed project.

Based on the above considerations, significant adverse impacts to recreation are not expected from implementing proposed project. Since there are no significant adverse impacts, no mitigation measures are required. This environmental topic will not be further evaluated in the Draft PEA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVI. SOLID/HAZARDOUS WASTE. Would the project:			
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

The proposed project impacts on solid/hazardous waste would be considered significant if the following occur:

- The generation and disposal of hazardous and non-hazardous waste would exceed the capacity of designated landfills.

DISCUSSION

XVI.a): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects

using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not directly increase the volume of solid or hazardous waste generation, require additional waste disposal capacity, or generate waste that does not meet applicable local, state, or federal regulations. However, the proposed project would allow the development of individual projects that qualify to receive emission offsets available from the SCAQMD's internal offset accounts. These individual projects could result in impacts on solid/hazardous waste by increasing the generation of solid waste such that the daily permitted capacity of the regional landfills are exceeded.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future solid and hazardous waste impacts from the construction and operation of various projects. Representative projects identified for the purpose of this assessment will be used to identify typical solid/hazardous waste impacts that could be expected from development projects or existing facility modifications proposed within the district. The potential impacts of these representative facilities on solid waste (both hazardous and non-hazardous waste) will be analyzed in the Draft PEA.

XVI. b): **No Impact.** Although the representative facilities could generate an increase in solid/hazardous waste from their new or modified equipment, they are expected to comply with federal, state, and local statutes and regulations relating to solid and hazardous waste because violating such statutes and regulations would subject the affected facilities to applicable agency enforcement and penalty actions, which could jeopardize further operation of the facility.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION/TRAFFIC. Would the project:			
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
either an increase in traffic levels or a change in location that results in substantial safety risks?			
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access or?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SIGNIFICANCE CRITERIA

The impacts on transportation/traffic would be considered significant if any of the following criteria apply:

- Peak period levels on major arterials would be disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection’s volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- There is an increase in traffic (e.g., 350 heavy-duty truck round-trips per day) that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.

DISCUSSION

XVI.a), b) and e): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked

reductions, eligible to offset emission increases. The proposed project does not directly propose any new site-specific or modified projects that would directly increase worker commute trips, raw material or finished product transport trips, adversely affect parking, or conflict with adopted policies associated with alternative transportation. However, the proposed project would allow the development of individual projects that qualify to receive emission offsets available from the SCAQMD's internal offset accounts. Typical impacts from individual projects could include an increase in vehicle trips leading to congestion and deterioration in the levels of service for the adjacent streets and intersections in the vicinity of each individual project. The projects could also result in inclusion of inadequate design features and incompatible uses that affect traffic operations and safety, and affect emergency access due to design features and traffic congestion.

To the extent possible, the analysis of impacts in the Draft PEA will be based on conservative assumptions and projections to identify reasonably foreseeable future impacts to traffic and transportation impacts from the construction and operation of various projects resulting from the individual projects accessing the SCAQMD's internal offset accounts under the proposed project. Representative projects identified for the purpose of this assessment will be used to identify typical traffic and transportation impacts that could be expected in the event that development projects or existing facility modifications occur in areas within the district that are already congested or in residential neighborhoods. The potential impacts of these representative facilities on traffic and transportation will be analyzed in the Draft PEA.

XVI. c): **No Impact.** Air traffic patterns are not expected to be directly or indirectly affected by the proposed project because the proposed rules and the representative facilities do not require or involve transport of equipment or other materials by air nor does the implementation of the proposed project interfere with air traffic because no project requires construction of structures that would exceed height limitations identified in Federal Aviation Regulation Part 77. All applicable local, state and federal requirements would continue to be complied with so no increase in any safety risks is expected.

XVI. d): **No Impact.** The proposed project is not expected to create or increase roadway hazards due to construction design features because the proposed project does not require or induce the construction of any roadways or other transportation roadway design features.

XVI. f): **No Impact.** The proposed project would have no direct affect on parking or existing parking capacity. While the affected commercial or industrial projects could result in an indirect increase in existing traffic, the parking capacity is not expected to substantially worsen by the proposed project because the representative facilities are expected to provide adequate parking capacity.

XVI. g): **No Impact.** Affected facilities would still be expected to comply with, and not interfere with adopted policies, plans, or programs supporting alternative transportation. In order to obtain and maintain approval for individual projects, representative facilities are not expected to hinder compliance with any applicable alternative transportation plans or policies.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.			
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVIII. a) and c): **Potentially Significant Impact.** As indicated in the environmental checklist responses in the preceding sections, potential project-specific impacts to biological sources (e.g., substantial reduction in the habitat of a fish or wildlife species, drop in fish or wildlife population below self sustaining levels, potential elimination of a plant or animal community, and reduction in the number or restriction of the range of a rare or endangered plant or animal) could occur. The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project is not expected to directly create new or substantially worsen existing impacts. Since the proposed project reflects changes in regulatory procedures, there would not be any direct physical environmental impact.

However, the proposed project would allow the development of individual projects that qualify to receive emissions offsets available from the SCAQMD's internal offset accounts. As discussed in individual impact sections, these individual projects could result in significant environmental impacts. Because the proposed project has the

potential to indirectly generate significant project-specific impacts, the proposed project also has the potential to create significant cumulative impacts. Therefore, this issue will be further evaluated in the Draft PEA.

XVIII. b): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not have any direct physical impacts. However, individual projects qualified to receive emissions offsets from the SCAQMD's internal offset accounts through proposed Rule 1315 and proposed amended Rule 1309.2 could result in significant environmental impacts individually and cumulatively. Representative projects identified for the purpose of this assessment will be used to identify typical cumulative impacts that could be expected from development projects or existing facility modifications proposed within the district. The cumulative impacts of these representative facilities and the other facilities which may utilize credits from the internal accounts will be analyzed in the Draft PEA.

XVIII. c): **Potentially Significant Impact.** The proposed project would specify regulatory procedures for making annual demonstrations of equivalency with federal offset requirements. It also would revise mitigation fees and noticing requirements for projects using the Offset Budget (after approval by USEPA), prohibit access to that budget by most electricity generating facilities, and establish types of reductions, including newly-tracked reductions, eligible to offset emission increases. The proposed project would not have any direct physical impacts. However, individual projects qualified to receive emissions offsets from the SCAQMD's internal offset accounts through proposed Rule 1315 and proposed amended Rule 1309.2 could emit criteria and toxic air contaminants, which in turn could result in health impacts. The potential health impacts from these emissions, on an aggregate basis, will be analyzed in the Draft PEA. Health impacts associated with representative projects identified for purposes of this assessment will also be analyzed to the extent feasible. In addition, GHG emissions from the construction and operation related to the development of individual projects qualified to receive emissions offsets from the SCAQMD's internal offset accounts through proposed Rule 1315 and amended Rule 1309.2 will be analyzed.

APPENDIX A

PROPOSED RULE 1315 FOR RE-ADOPTION

PROPOSED RULE 1315 – FEDERAL NEW SOURCE REVIEW TRACKING SYSTEM

(a) Purpose

The purpose of this rule is to:

(1) Maintain the District's ability to continue to issue permits to major sources that obtain offset credits from the Priority Reserve under Rule 1309.1, from the Offset Budget under Rule 1309.2, and/or that are exempt from offsets under Rule 1304;

(2) Memorialize in rule form the ~~specify~~ procedures to be followed by the Executive Officer ~~to~~for:

(A) Establishing the District's NSR program equivalency with federal NSR offset requirements for such major sources; and

(B) Demonstrating that sufficient emission reductions, including previously-untracked emission reductions, existed beyond regulatory requirements under federal law to be used as offset credits to establish that the District's NSR program is equivalent with federal NSR offset requirements for major sources that are exempt from offsets under Rule 1304, obtain offset credits from the Priority Reserve under Rule 1309.1 and/or the Offset Budget under Rule 1309.2.

~~make annual demonstrations of equivalency to verify that specific provisions in the District's New Source Review (NSR) program related to sources that are either exempt from offsets or which obtain their offsets from the District's offset accounts meet in aggregate the federal nonattainment NSR offset requirements. The procedures specified in this rule are used by the Executive Officer to demonstrate that the sources which are subject to the federal NSR emission offset requirements and which obtain emission credits through allocations from District Rule 1309.1 – Priority Reserve or Rule 1309.2 – Offset Budget or which utilize the emission offset exemptions contained in Rule 1304 – Exemptions are fully offset by valid emission credits.~~

(b) Definitions

(1) COMMUNITY BANK means the Community Bank as established by Rule 1309.1 – Community Bank, as adopted June 28, 1990 and by Rule

1309.1 – Community Bank And Priority Reserve, as amended May 3, 1991, and became unavailable to applications deemed complete after the December 7, 1995 amendments to Rule 1309.1 – Priority Reserve, which eliminated the Community Bank.

- (2) OFFSET BUDGET means the Offset Budget as established by Rule 1309.2.
- ~~(3)~~(4) OFFSET RATIO means the ratio of the quantity of offset credits provided (in pounds per day) to offset a specific quantity of increase in potential emissions (in pounds per day).
- ~~(4)~~(2) ORPHAN REDUCTION means any reduction in actual emissions from a permitted source within AQMD resulting from a physical change to the source and/or a change to the method of operation of the source provided the change is reflected in a revised permit for the source and provided such reduction is not otherwise required by rule, regulation, law, approved Air Quality Management Plan Control Measure, or the State Implementation Plan and does not result in issuance of an ERC.
- ~~(5)~~(3) ORPHAN SHUTDOWN means any reduction in actual emissions from a permitted source within AQMD resulting from removal of the source from service and inactivation of the permit without subsequent reinstatement of such permit provided such reduction is not otherwise required by rule, regulation, law, approved Air Quality Management Plan Control Measure, or the State Implementation Plan and does not result in issuance of an ERC.
- (6) PRIORITY RESERVE means the Priority Reserve as established by the May 3, 1991 amendments to Rule 1309.1 – Community Bank and Priority Reserve and as amended by the December 7, 1995 and subsequent amendments to Rule 1309.1 – Priority Reserve.
- (c) Offset Accounts for Federal NSR Equivalency
- (1) District Offset Accounts
- The Executive Officer shall maintain a separate District offset account for each federal nonattainment air contaminant. The District offset accounts are established with valid credits effective October 1, 1990 for the air contaminants and with the initial account balances as listed in Table A. Any portions of the initial account balances identified in Table A remaining in the District offset accounts at the end of calendar year 2005

shall be removed from the District offset accounts by the Executive Officer and shall not be used for purposes of demonstrating equivalency between federal NSR offset requirements and the District’s NSR program. Additional District offset accounts are to be established by the Executive Officer in the event that additional federal nonattainment air contaminants or their precursors become subject to federal nonattainment NSR offset requirements. If the United States Environmental Protection Agency (EPA) changes the District’s attainment designation from nonattainment to attainment for a specific air contaminant the Executive Officer may discontinue tracking and reporting the associated District offset account for that air contaminant. The District’s NSR program shall be considered equivalent to federal nonattainment NSR offset requirements for an air contaminant so long as the procedures specified in this rule are followed and the balance in the District offset account for that contaminant remains positive.

TABLE A
Initial District Offset Account Balances

Air Contaminant	Initial Account Balance (tons per day)
Volatile Organic Compounds (VOC)	38.46
Nitrogen Oxides (NOx)	23.92
Sulfur Oxides (SOx)	8.04
Carbon Monoxide (CO)	8.45
Fine Particulate Matter (PM10)	2.67

- (2) Tracking of Offset Account Debits for Federal NSR Equivalency
The Executive Officer shall track and debit from the District offset accounts the following types of offset allocations or exemptions provided from the District offset accounts for sources located at major polluting facilities and which are not exempt from the offset requirements of federal nonattainment NSR:
 - (A) Emission offsets from the Priority Reserve or Community Bank pursuant to Rule 1309.1 ~~Priority Reserve~~;
 - (B) Emission Offsets from the Offset Budget pursuant to Rule 1309.2—Offset Budget; and

- (C) Exemptions from the offset requirements of Rule 1303 – Requirements pursuant to Rule 1304 – Exemptions.

The applicable offset ratios for offsets tracked by the Executive Officer pursuant to this paragraph is 1.2-to-1.0 for extreme nonattainment air contaminants and their precursors and is 1.0-to-1.0 for all other nonattainment air contaminants.

- (3) Tracking of Offset Account Credits for Federal NSR Equivalency
- (A) The Executive Officer shall track and credit the following types of emission reductions to the District offset accounts:
- (i) Orphan shutdowns;
 - (ii) Orphan reductions;
 - (iii) ERCs provided as emission offsets for sources located at minor facilities;
 - (iv) The difference between the quantity of ERCs provided for a source located at a major polluting facility at a 1.2-to-1.0 offset ratio pursuant to Rule 1303(b)(2)(A) and the quantity of ERCs required to offset the emission increases at a ratio of 1.0-to-1.0 for all non-attainment air contaminants except extreme nonattainment air contaminants and their precursors.
 - (v) The amount of emission reductions associated with a facility's NSR balance, Community Bank, Offset Budget, and Priority Reserve allocations, and offset exemptions which is subtracted from the emission reductions quantified pursuant to Rule 1306(c) as part of the Executive Officer's evaluation of an ERC banking application; and
 - (vi) The portion of all emission reductions quantified pursuant to Rule 1306(c) as part of the Executive Officer's - evaluation of an ERC banking application which is subtracted from the emission credit prior to issuance of the banked ERC pursuant to Rule 1309(b)(4)(E). This clause applies only in cases where the Executive Officer demonstrates and EPA concurs that the subtracted amount exceeds the discount that would be required by approved SIP rules and rules scheduled to be approved by the District in the following year's rule cycle.

- (B) The Executive Officer shall deposit emission reductions into the District offset accounts according to the following procedures:
 - (i) From orphan sources tracked pursuant to clauses (c)(3)(A)(i) or (c)(3)(A)(ii) at eighty percent of the total or change in the source's permitted emission levels, respectively; and
 - (ii) From ERCs tracked pursuant to clauses (c)(3)(A)(iii), (c)(3)(A)(iv), (c)(3)(A)(v), and (c)(3)(A)(vi).
 - (C) The Executive Officer may choose not to track all potential sources of credits in each reporting period if the Executive Officer determines that sufficient credits remain in the District offset accounts to demonstrate equivalency in each reporting period.
- (4) Surplus at the Time of Use
- All credits deposited into the District offset accounts pursuant to clauses (c)(3)(A)(i) and (c)(3)(A)(ii) shall be discounted by the Executive Officer to ensure that they remain surplus at the time of use. Such discounting shall be performed annually and shall be based on the percentage reduction in overall permitted emissions projected to be achieved as a result of implementation of control requirements that become effective during the year for each specific pollutant within the District.
- (d) Federal NSR Equivalency Determinations
- (1) Reporting Periods
- The Executive Officer shall aggregate tracked offsets provided from the District offset accounts - into the following reporting periods for purposes of making periodic determinations of equivalency:
- (A) October 1, 1990 through July 31, 1995;
 - (B) Each of the consecutive twelve-month periods commencing with August 1995 through July 1996 and concluding with August 2003 through July 2004;
 - (C) August 2004 through December 2005; and
 - (D) Each calendar year commencing with 2006.
- (2) Preliminary Determinations of Equivalency
- Commencing with the ~~August 2004 through December 2005~~ calendar year 2008 reporting period, the Executive Officer shall, no later than twelve months after the completion of the reporting period, complete a

Preliminary Determination of Equivalency (PDE) with federal nonattainment NSR offset requirements. The Executive Officer shall report the PDE to the District's Governing Board and EPA no later than the second regularly-scheduled monthly Governing Board meeting after the completion deadline for the PDE. The PDE is a conservative assessment of available balances of credits without accounting for orphan and other credits which become available during the reporting period. As a result, each PDE shall include the debit accounting elements identified in paragraph (c)(2) and the running balances in the District offset accounts at the beginning and at the end of the subject reporting period.

(3) Final Determinations of Equivalency

Commencing with the ~~August 2004 through December 2005~~ calendar year 2008 reporting period, the Executive Officer shall complete a Final Determination of Equivalency (FDE) with federal nonattainment NSR offset requirements for any account(s) for which the PDE did not demonstrate equivalence. The FDE for any such account(s) shall be completed no later than eighteen months after the completion of the subject reporting period. The Executive Officer shall report the FDE to the District's Governing Board and EPA no later than the second regularly-scheduled monthly Governing Board meeting after the completion deadline for the FDE for any account(s) for which the PDE did not demonstrate equivalence. Each FDE shall include both the debit and the credit accounting elements identified in paragraphs (c)(2) and (c)(3), respectively, and the running balances in the District offset accounts at the beginning and at the end of the subject reporting period. The Executive Officer shall report the credit accounting elements identified in paragraph (c)(3) for any account(s) for which the PDE did demonstrate equivalence either with the FDE for the same reporting period or with the PDE for the subsequent reporting period.

(4) Early FDE Subsuming PDE

In lieu of preparing both a PDE and an FDE for a single reporting period, the Executive Officer may opt to include the PDE in the FDE for the same reporting period. Such FDEs are subject to the same completion and reporting deadlines as are the PDEs which they subsume.

(e) Projections of District Offset Account Balances

Each PDE and each FDE report the Executive Officer prepares and presents to the Governing Board and EPA shall also include projections of the District offset account balances at the end of each of the two subsequent reporting periods. The Executive Officer shall make the projections of the District offset account balances based upon the average of the total annual debits and the average of the total annual credits for the five reporting periods most recently included in a PDE or an FDE. Although these projections are to be reported with the results of the PDEs and FDEs, they are separate from the determinations of equivalency and do not constitute an element of the determinations of equivalency.

(f) Backstop Provisions

(1) Funding of the Priority Reserve

If the most recent actual District offset account balances determined by an FDE pursuant to paragraph (d)(3) demonstrate a shortfall for any air contaminant, the Executive Officer shall:

(A) Discontinue funding the Priority Reserve for any air contaminant which the most recent FDE has demonstrated does not have a positive balance in its District offset account no later than the completion deadline for the FDE specified in paragraph (d)(3). If the most recent projections of the District offset account balances prepared pursuant to subdivision (e) in conjunction with a PDE or an FDE predict a shortfall for any air contaminant, the Executive Officer shall discontinue funding the Priority Reserve for that contaminant during the year which the shortfall is projected to exist. The Executive Officer may resume funding the Priority Reserve according to the following schedule:

~~(A) — In cases where the Executive Officer has discontinued funding the Priority Reserve due to an actual account shortfall demonstrated pursuant to paragraph (d)(3), the Executive Officer may resume funding the Priority Reserve upon completion of a PDE or an FDE demonstrating that the shortfall no longer exists.~~

~~(B) — In cases where the Executive Officer has discontinued funding the Priority Reserve due to an offset account shortfall projected pursuant to subdivision (e), the Executive Officer~~

~~may resume funding the Priority Reserve upon either completing a PDE or an FDE pursuant to paragraphs (d)(2) or (d)(3), respectively, demonstrating that no actual shortfall exists for the reporting period in which the shortfall was projected to occur; or completing a new projection pursuant to subdivision (e) for the same reporting period demonstrating that the shortfall is no longer projected to occur.~~

(B) Discontinue issuing permits to construct and permits to operate that rely on Rule 1304 exemptions, Priority Reserve offsets from Rule 1309.1, or the Rule 1309.2 Offset Budget for the air contaminant that has a shortfall to sources that are major sources of that air contaminant. The Executive Officer may resume issuance of such permits upon completion of an FDE demonstrating that the shortfall no longer exists.

(2) If an FDE demonstrates that a shortfall exists in any of the District offset accounts, or the most recent projected District offset balances calculated pursuant to subdivision (e) predict that such a shortfall will exist, the Executive Officer shall prepare a report to the Governing Board recommending appropriate action to rectify the shortfall. The Executive Officer shall present this report to the Governing Board no later than six months after the completion deadline for the FDE pursuant to paragraph (d)(3) demonstrating, or for the projections pursuant to subdivision (e) projecting the shortfall. The report shall either recommend implementing one or more of the following backstop provisions as needed to correct the shortfall or include an explanation of why it is not necessary to implement any of the following backstop provisions by making a demonstration that the District remains in compliance with federal NSR offset requirements on an aggregate basis:

(A) Provide additional credits to the District offset account(s) which have a shortfall within six months of the FDE that demonstrated the shortfall or the subdivision (e) projection that predicted it. The Executive Officer may obtain such credits by purchasing them, by funding emission reduction projects using quantification protocols approved by EPA, application of BACT (federal LAER) in excess

of federal requirements, or other credit sources approved by EPA;
and/or

- (B) Suspend funding of the Offset Budget within 90 days of the Executive Officer's report to the Governing Board recommending implementation of this backstop measure~~FDE that demonstrated the shortfall,~~ with funding not to be resumed until equivalency has been reestablished; and/or
- (C) Propose amendments to Rule 1304, Rule 1309.1, and/or Rule 1309.2 to eliminate certain offset exemptions or to eliminate certain sources' eligibility to receive offsets from the Priority Reserve or from the Offset Budget, respectively.

APPENDIX B

PROPOSED AMENDMENTS TO RULE 1309.2

PROPOSED AMENDED RULE 1309.2. - OFFSET BUDGET

(a) Offset Budget

The Executive Officer shall establish an Offset Budget to provide credits for sources that require external emission offsets for NOx, SOx, and PM₁₀~~and CO~~, upon approval by CARB and U.S. EPA.

(b) Eligibility Requirements

(1) Operators of facilities that are not exempt from offset requirements pursuant to Rule 1304 nor are eligible for allocations from the Priority Reserve (Rule 1309.1), and require external offsets may be eligible for allocations from the Offset Budget.

(2) Prior to receiving an allocation from the Offset Budget, an operator shall:

(A)~~(a)~~ Demonstrate that all sources the applicant owns or operates in the AQMD meet Best Available Retrofit Control Technology (BARCT) levels as defined in Regulation XI rules, or demonstrate to the satisfaction of the Executive Officer that the applicant owns or operates no sources which could be modified to BARCT levels; and

(B)~~(b)~~ Conduct a due diligence effort (limited to costs not to exceed the Rule 1309.2 mitigation fee for that pollutant) approved by the Executive Officer or designee to secure available credits, including STCs; and

(C)~~(c)~~ Pay a non-refundable mitigation fee of the following amounts:

(i) For permanent credits ~~(for the period November 1, 2002 through June 30, 2003)~~

CO	\$15,000
NOx	\$ <u>77,203</u> 22,875
PM ₁₀	\$ <u>145,562</u> 31,250
SOx	\$ <u>61,048</u> 11,125

for each pound per day of each pollutant obtained from the Offset Budget; or,

(ii) For short-term credits ~~(for the period November 1, 2002~~

~~through June 30, 2003)~~

CO	\$1,100
NOx	\$5,681,800
PM ₁₀	\$10,711,300
SOx	\$4,492,820

for each pound per day per year by pollutant obtained from the Offset Budget.

~~The mitigation fee for Offset Budget allocations will be identified in Regulation III—Fees, for the period subsequent to June 30, 2003.~~

(c) The Executive Officer:

- (1) Will prioritize allocations based on meeting the qualification of subdivision (b) above and the date the application is deemed complete; and
- (2) Will issue no one facility more than 15% of the allocations available in any one year nor more than necessary for permit issuance; and
- (3) Will track and maintain records of all credits generated and allocations granted for use from the Offset Budget and annually report this activity to the District Governing Board at a regularly scheduled public meeting, CARB and the U.S. EPA; and
- (4) May pre-fund the Offset Budget with year 2000 through 2002 Expired Permit Source Shutdown Credits (EPSSCs), from non-major polluting facilities with emissions greater than 4 tons per year ~~(29 tons per year for CO)~~, that are not used to demonstrate equivalency with federal or state NSR requirements based on actual emissions prior to shutdown. Actual emissions from EPSSCs shall be determined based on emissions reported by the facility as part of the two most recent annual emissions inventory reports, prior to shutdown, submitted pursuant to Rule 301-Permit Fees. In the absence of Rule 301 emissions inventory reports, NSR permit levels discounted by 20% will be used to reflect actual emissions; and
- (5) May accrue ongoing funding for the Offset Budget from:
 - (A) EPSSCs in years 2003 and beyond, from non-major polluting facilities with emissions greater than 4 tons per year ~~(29 tons per year for CO)~~, based on actual emissions determined as specified in paragraph (c) (4),

- (B) Emission reduction projects funded by Offset Budget mitigation funds, as approved by CARB and U.S. EPA, or
 - (C) Other methods as approved by the Executive Officer, CARB and U.S. EPA; and
- (6) ~~The EO~~ shall not use any EPSSCs to fund the Offset Budget, unless equivalency with the state and federal NSR requirements is demonstrated first; and
 - (7) Will adjust all allocations to the Offset Budget to be surplus to any emission reductions otherwise required by the federal Clean Air Act including federal emission limitations and control requirements, state regulations that are approved into the State Implementation Plan, and other requirements relied upon for meeting requirements of the federal Clean Air Act; and
 - (8) Will publish the available allocations in the Offset Budget at the January Board hearing for that calendar year; and
 - (9) Will limit the allocations available from the Offset Budget during that calendar year. Allocations shall not be granted in excess of those available in the Offset Budget; and
 - (10) Shall not allow allocations from the Offset Budget to be banked, transferred, or used by an operator to generate ERCs or STCs except that the District may purchase the unused credits at a price of 66% of the original purchase price; and
 - (11) Shall subject the operator of facilities obtaining allocations from the Offset Budget an offset ratio of 1.2:1; and
 - (12) Shall not grant allocations from the Offset Budget to fossil fuel-fired thermal power plants that generate electricity for distribution in the state grid system, except for any facility with electric generating equipment totaling less than 50 megawatts where at least 70 % of the generated electricity is for its own use.
- (d) Public Notice
Prior to issuance or granting the use of the allocations or STCs, the operator of a facility requesting allocations from the Offset Budget, or requesting the initial generation (excluding conversion of ERC(s) to STC(s)) or use of any STCs shall:

- (1) Publish a notice, prepared by the Executive Officer, containing source information and the District's analysis on air quality, in a newspaper of general circulation in each of the four counties in the AQMD, and
- (2) Mail a copy of the notice required in paragraph (d)(1) to the Administrator of U.S. EPA Region IX and the Executive Officer of the California Air Resources Board, and
- (3) Respond to all public comments received within 30 days of the notice publication. Copies of all comments and responses shall be provided to the Executive Officer. The Executive Officer will consider all comments and responses prior to final approval of the allocations or STCs and
- (4) Provide proof of publication of the notice to the Executive Officer.

APPENDIX C

LIST OF NOP/IS PREPARERS

SCAQMD List of Preparers

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Gabriel Olson Environmental Planner
Hina Gupta Environmental Planner
Keith Cooper Senior Environmental Scientist

**COMMENTS ON THE NOP/IS AND RESPONSES TO
COMMENTS**



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Gentlemen:

Notice of Preparation of Draft Program Environmental Assessment for PR 1315 and PAR 1309.2

Thank you for hosting the public scoping meeting on April 8, 2009 for the subject rulemaking and associated environmental assessment work. We have one comment on your environmental proposal and one comment on your proposed rule language at this time.

Initial Study Comment

Our principal comment pertains to the two year "look-back" period and the evaluation of "representative" facilities as shown partly in your slide presentation and on Page 2-6 of the Initial Study. We believe that a "look-back" period longer than the two years stated in your slide presentation would be a more appropriate timeframe to pick up the larger, more traditional public works construction projects that the Sanitation Districts engage in. Ten years seems a more appropriate timeframe to capture traditional infrastructure construction.

1-1

Future projects, however, may not be accurately predicted by past actions. In the AB 32 Scoping Plan, for instance, six water industry greenhouse gas control measures are targeted for the water/wastewater industry including renewable energy production and water recycling. We are aware of a number of innovative proposals in these areas that might not be adequately addressed by looking back at the past, particularly for the purposes of quantifying direct and indirect adverse impacts.

1-2

If it would be of assistance to you, we could canvass our trade association members quickly and develop a shortlist of projects likely to be carried out to accommodate AB 32 and other regulatory programs being developed by the State of California.

1-3

Proposed Rule 1315 Amendment Comment

We question the wisdom of the addition of section (f)(1)(B) language, **obligating** the District to discontinue issuing permits to major sources upon a FDE actual shortfall, to Proposed Rule 1315. This language seems to almost guarantee future permitting moratoriums similar to the current situation we are facing as a result of the Priority Reserve lawsuits. Surely for projects/sources that have already gone through New Source Review and which result in a reduction of actual emissions or provide for the installation of air pollution control equipment or which mitigate other negative environmental impacts (such as groundwater remediation), some special considerations could be made. The proposed language completely closes the door on these possibilities for major sources. Such language would, for instance, unilaterally stop the current permitting of emergency standby generators, even those that have an increase of less than ½ pound of pollution per day.

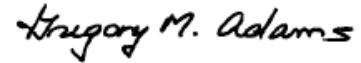
1-4

We do appreciate your efforts to move forward the preparation of the environmental documentation for these important rules as rapidly as possible.

1-4
Con't

Yours very truly,

Stephen R. Maguin



Gregory M. Adams
Assistant Departmental Engineer
Air Quality Engineering
Technical Services Department

Responses to Draft NOP/IS Comment Letter #1

**County Sanitation District of Los Angeles County
Gregory M. Adams**

March 13, 2009

Response 1-1

SCAQMD staff considered your comment regarding the appropriateness of “looking back” back at two years of past and pending permit applications and whether the evaluation should include more projects that would have applied for an air quality permit over a longer period of time. While the commentator suggested a ten-year timeframe, SCAQMD staff believes ten years is excessive and will not produce any different type of facility than would be discovered when evaluating a smaller timeframe. As such, SCAQMD staff modified the analysis to “look back” five years of past and pending permit applications. As shown in the indirect impacts analysis (Chapter 5) and Appendix E of the Draft PEA, public works projects have been captured as “representative” facilities.

Response 1-2

Future projects, in some cases, may not be predicted by past actions, but past projects do provide the most accurate information in forecasting the types of projects that could take place in the future. It would be speculative to guess the future projects. Pursuant to the CEQA Guidelines § 15145, “if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.” Nevertheless, the potential indirect environmental impacts of an extremely wide variety of projects have been evaluated in Chapter 5. It is expected that the scope of impacts discussed will encompass probable impacts of implementing GHG control measures.

Response 1-3

The SCAQMD would be interested in learning about the shortlist of projects that would be implemented to carry out regulatory action under AB 32. The commentator has sent a subsequent comment letter (see comment letter #4) providing the results from the canvassing of trade association members as promised in this comment. See Comment 4-1. No projects could be identified in sufficient detail at this time.

Response 1-4

To discontinue offset funding when a shortfall occurs is not a newly introduced requirement in the modified version of Rule 1315. Previously, Rule 1315 had a backstop provision to discontinue funding specifically to the Priority Reserve when a shortfall for any air contaminant is demonstrated by a Final Determination of Equivalency (FDE). The latest proposal expands the backstop provision, under subparagraph (f)(1)(B), to include other SCAQMD internal offset accounts, such as Rule 1304 exemptions. The concept that offsets from the SCAQMD internal offset accounts should not be distributed if there is a known shortfall does not change from the previously adopted rule and does not lack wisdom as suggested by the commentator. The SCAQMD believes this makes common sense not to issue offsets that are not available. If offsets are not issued, the permits to construct and operate relying on those offsets can also not be issued. Permits that do not rely on the SCAQMD internal offset accounts are not restricted by the backstop provision and can be issued if in compliance with all other rules and regulations. Equipment that does not increase in emissions may not require offsets. In addition, the operator does not have to rely on the SCAQMD internal offset accounts to offset emissions. The operator does have the option to obtain the offsets from the open market and, thereby, not be subject to the backstop provision.

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LATHAM & WATKINS LLP

April 15, 2009

VIA E-MAIL

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File No. 043158-0000

Re: Notice of Preparation of a Draft Program Environmental Assessment for Re-Adoption of Proposed Rule 1315 – Federal New Source Review Tracking System, and Adoption of Proposed Amendments to Rule 1309.2 – Offset Budget

Dear Mr. Krause:

Latham & Watkins LLP submits the following comments on the Notice of Preparation and Initial Study (NOP/IS) of a Draft Program Environmental Assessment (PEA) for Re-Adoption of Proposed Rule 1315 – Federal New Source Review Tracking System, and Adoption of Proposed Amendments to Rule 1309.2 – Offset Budget, which was released for public review on March 17, 2009.

It is our understanding that the purpose of the proposed amendments to Rule 1309.2, when combined with the South Coast Air Quality Management District's (District) decision to not re-amend Rule 1309.1 to allow electric generating facilities to access the Priority Reserve,¹ is to somehow simplify the environmental analysis in the PEA by eliminating the need to analyze the power generation sector. The NOP/IS envisions that the PEA will "analyze direct and indirect impacts from both major and minor sources relying on credits from the Rule 1309.1 Priority Reserve, Rule 1309.2 Offset Budget, or Rule 1304 offset exemptions." NOP/IS at 1-1. The staff appears to infer that under a scenario where power plants cannot access offsets from the District's internal accounts, the PEA need not analyze environmental impacts associated with power plants.

We regard such reasoning as flawed and ultimately counterproductive to the District's commendable efforts to re-adopt Proposed Rule 1315. A reasonable alternative to the proposed

¹ NOP/IS at 1-1.

Mr. Michael Krause
April 15, 2009
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LATHAM & WATKINS^{LLP}

project analyzed in the PEA is the re-adoption of Rule 1315 with no amendments to Rule 1309.2. That alternative must be analyzed in the PEA. Further, even if the project is approved as proposed by staff, the PEA must analyze the potential adverse environmental impacts of denying power plants access to the Offset Budget. Finally, by constraining the scope of the PEA as proposed, staff is usurping the Governing Board's policy authority and improperly circumscribing the Board's discretion to consider alternatives. For all of these reasons, the PEA must include an analysis of the power sector.

2-1
Con't

I. DISTRICT SHOULD INCLUDE AN ALTERNATIVE THAT DOES NOT AMEND RULE 1309.2.

The District must consider a reasonable range of alternatives for evaluation in the PEA. 14 Cal Code Regs (CCR) § 15126.6(a); *Citizens of Goleta Valley v Board of Supervisors*, 52 Cal. 3d 553, 566 (1990); *Save San Francisco Bay Ass'n v San Francisco Bay Conserv. & Dev. Comm'n*, 10 Cal. App. 4th 908, 919 (1992). The California Supreme Court has described the discussion of alternatives, along with mitigation measures, as "the core of an EIR." *Citizens of Goleta Valley v Board of Supervisors*, 52 Cal. 3d 553, 564 (1990). Accordingly, the PEA should include evaluation of a highly likely outcome of this rulemaking process (perhaps even more likely than the proposed project) – an alternative that involves re-adoption of Rule 1315 but no amendments to Rule 1309.2.

A. The Staff has Artificially and Impermissibly Narrowed the Project Objectives.

The NOP/IS presents the objectives of the project in two different places within the document. Tellingly, the two lists differ in one important respect. Early on in the document, it states that the objectives are "to maintain the SCAQMD's ability to:

- (1) administer its NSR [New Source Review] program for major and minor sources,
- (2) specify the types of surplus emission reductions that may be deposited into the SCAQMD's internal accounts and used to offset emission increases,
- (3) memorialize in rule form the accounting procedures used by the SCAQMD to establish equivalency with federal offset requirements, and
- (4) establish mechanisms that ensure valid emission offsets are available before a source relying on those emission offsets obtains an approved permit, in order to prevent a net increase in criteria and precursor emissions." NOP/IS at 1-2.

2-2

Notably, denying power plants access to the Offset Budget is not included in this first list.

Only later in the document is denying power plants access to the Offset Budget identified as a project objective. NOP/IS at 1-16-17. It appears that this objective was grafted onto the

Mr. Michael Krause
 April 15, 2009
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LATHAM & WATKINS^{LLP}

core project objectives as an afterthought to justify the proposal to amend Rule 1309.2, and to set up the argument that failure to amend Rule 1309.2 would fail to meet this project objective. Such an approach is not permitted under CEQA because overly narrow project objectives may unduly circumscribe a lead agency's consideration of project alternatives – just as they would here. A lead agency may not give a project's purpose an artificially narrow definition. *In re Bay-Delta Programmatic Environmental Impact Report*, 43 Cal. 4th 1143, 1166 (2008). The staff's crafting of the project objectives is an impermissible effort to artificially narrow the project's purpose and prevent consideration of what is clearly a reasonable alternative to the proposed project.

2-2
 Con't

B. Alternative Need Only Attain Most of the Basic Project Objectives.

Even if one were to accept as appropriate staff's attempts to craft the project objectives in a manner that narrows the range of possible alternatives, it is indisputable that an alternative that does not amend Rule 1309.2 would still "attain most of the basic objectives of the project," thereby satisfying the applicable CEQA standard for valid project alternatives. *See* 14 CCR § 15126.6(a). The PEA must describe a reasonable range of alternatives that would "attain *most of the basic* objectives of the project." 14 CCR § 15126.6(a)(emphasis added). In other words, the PEA should not exclude an alternative from detailed consideration merely because it would impede to some degree the attainment of project objectives. 14 CCR § 15126.6(b).

2-3

C. Alternative is Potentially Feasible.

Alternatives only need to be "potentially feasible." 14 CCR § 15126.6(a). An alternative that does not amend Rule 1309.2 clearly is not only potentially feasible, but also feasible in fact. Such an alternative merely requires the District to refrain from taking a discretionary action and to preserve the status quo.

2-4

Indeed, such an alternative is akin to a no-project alternative. As acknowledged by the NOP/IS, "CEQA also requires an evaluation of a 'No Project Alternative.'" NOP/IS at 1-17; 14 CCR § 15126.6(e). When a project involves revision of an existing plan, policy, or ongoing operation, the no-project alternative should reflect continuation of the existing plan, policy, or operation. 14 CCR § 15126.6(e)(3)(A). Here, the no-project alternative should reflect continuation of Rule 1309.2 as-is. Notably, the no-project alternative must be evaluated whether or not it is feasible. *Planning & Conserv. League v Department of Water Resources*, 83 Cal. App. 4th 892, 917-18 (2000).

D. Alternative Can Reduce Significant Environmental Impacts.

Alternatives need to be environmentally superior, but only in some respects. *Sierra Club v. City of Orange*, 163 Cal. App. 4th 523, 547 (2008). Environmental assessments may present alternatives that provide greater benefits at higher environmental cost; indeed, such a discussion helps to highlight policy trade-offs.

2-5

An alternative that does not amend Rule 1309.2 would maintain access for power plants to the Offset Budget, which could allow new power plants to come on-line. While the

Mr. Michael Krause
 April 15, 2009
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LATHAM & WATKINS^{LLP}

construction and operation of new power plants would generate environmental impacts, it would also provide significant environmental benefits. The primary environmental benefits are associated with turning over the existing fleet of power plants in the South Coast Basin.

As explained by the District’s Executive Officer in a March 2, 2009 presentation to a Joint Assembly Hearing of the Utilities & Commerce And Natural Resources Committees, 56% of the generation capacity of the existing fleet is 35 years or older. *See* enclosure at 10. As recognized by the District, the “CEC believes many power plants are currently 40 to 60 years old and are at high risk of retirement.” SCAQMD, Final Program Environmental Assessment for: Proposed Amended Rule 1309.1 – Priority Reserve and Re-Adoption of Rule 1315 – Federal New Source Review Tracking System (July 10, 2007) at 2-5.

As new plants come on-line, it facilitates the retirement of older plants. As recognized by the District, “Modern day EGFs are significantly cleaner than the power plants built years earlier.” SCAQMD, Final Staff Report: Proposed Amended Rule 1309.1 – Priority Reserve; and Proposed Re-Adopted Rule 1315 – Federal New Source Review Tracking System (July 2007) at 4. Also, “[c]lean and efficient new power plants are desirable not only because they will help meet increasing electricity demand, but also would minimize the use of emergency standby diesel generators that would be used as an alternative power source in the event of future blackouts.” SCAQMD, Final Program Environmental Assessment for: Proposed Amended Rule 1309.1 – Priority Reserve and Re-Adoption of Rule 1315 – Federal New Source Review Tracking System (July 10, 2007) at 4-1. The District acknowledges that standby diesel generators are “old” and “high-polluting,” and reducing their use further “avoids an increase in criteria pollutant and toxic emissions.” *Id.* at 2-19.

As such, the integration of new power plants into the South Coast Basin fleet ultimately will result in fewer criteria pollutant, toxic, and greenhouse gas emissions. Accordingly, an alternative that does not amend Rule 1309.2 would be environmentally superior in some respects to the proposed project.

E. Alternative is Reasonable and Realistic.

CEQA requires that alternatives be reasonable and realistic. 14 CCR § 15126.6. An alternative that does not amend Rule 1309.2 is both. Such an alternative merely requires the District to refrain from taking a discretionary action, i.e., to preserve the status quo.

F. Programmatic Nature of District’s Environmental Assessment Requires an Exhaustive Consideration of Alternatives.

As recognized by the NOP/IS,² because the District’s environmental assessment will be programmatic, it is even more crucial that the PEA extensively evaluate alternatives, especially

² “A program CEQA document allows consideration of broad policy alternatives and program-wide mitigation measures at a time when an agency has greater flexibility to deal with basic problems of cumulative impacts.” NOP/IS at 1-3.

2-5
 Con't

2-6

2-7

Mr. Michael Krause
 April 15, 2009
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policy alternatives. A Program Environmental Impact Report (PEIR) allows the “lead agency to consider broad policy alternatives...at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts.” *In re Bay-Delta Programmatic Environmental Impact Report*, 43 Cal. 4th 1143, 1169 (2008)(citing 14 CCR § 15168(b)(4)). Similarly, PEIRs and PEAs “[p]rovide an occasion for a more exhaustive consideration of effects and alternatives....” 14 CCR § 15168(b)(1).

An alternative that does not amend Rule 1309.2 is precisely the type of broad policy alternative that the PEA should address. The Governing Board could make a policy decision to leave Rule 1309.2 as-is. As such, the PEA should evaluate the environmental implications of such a decision in order to aid the Governing Board’s deliberations. The need to consider an alternative that does not amend Rule 1309.2 is especially acute because the District intends to “rely on this PEA to form the basis of a project-specific analysis for projects that access the Priority Reserve or Offset Budget.” NOP/IS at 1-4. Unless the PEA includes the proffered alternative, the District may find itself unable to rely on the PEA for future projects accessing the Offset Budget.

II. EVEN IF THE PROPOSED PROJECT IS APPROVED AS-IS, DISTRICT MUST ASSESS ADVERSE ENVIRONMENTAL IMPACTS OF DENYING POWER PLANTS ACCESS TO THE OFFSET BUDGET.

Even if the proposed project is approved as-is, the PEA must analyze the potential adverse environmental impacts of denying power plants access to the Offset Budget. Without access to the Offset Budget, it will be exceedingly difficult for new power plants to come on-line in the South Coast Basin. While the construction and operation of new power plants would generate environmental impacts, it would also provide significant environmental benefits. The primary environmental benefits are associated with turning over the existing fleet of power plants.³ By altering the status quo and denying power plants access to the Offset Budget, the District is preventing a ‘greening’ of the fleet.

As explained by the District’s Executive Officer in a March 2, 2009 presentation to a Joint Assembly Hearing of the Utilities & Commerce And Natural Resources Committees, 56% of the generation capacity of the existing fleet is 35 years or older. See enclosure at 10. As recognized by the District, the “CEC believes many power plants are currently 40 to 60 years old and are at high risk of retirement.” SCAQMD, Final Program Environmental Assessment for: Proposed Amended Rule 1309.1 – Priority Reserve and Re-Adoption of Rule 1315 – Federal New Source Review Tracking System (July 10, 2007) at 2-5.

As new plants come on-line, it facilitates the retirement of older plants. As recognized by the District, “Modern day EGFs are significantly cleaner than the power plants built years earlier.” SCAQMD, Final Staff Report: Proposed Amended Rule 1309.1 – Priority Reserve;

³ While the environmental benefits of turning over the existing fleet of power plants are detailed in Part I.C of this comment letter, we reiterate the benefits here because of the typically splintered nature of lead agencies’ responses to public comments.

Mr. Michael Krause
 April 15, 2009
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LATHAM & WATKINS LLP

and Proposed Re-Adopted Rule 1315 – Federal New Source Review Tracking System (July 2007) at 4. Also, “[c]lean and efficient new power plants are desirable not only because they will help meet increasing electricity demand, but also would minimize the use of emergency standby diesel generators that would be used as an alternative power source in the event of future blackouts.” SCAQMD, Final Program Environmental Assessment for: Proposed Amended Rule 1309.1 – Priority Reserve and Re-Adoption of Rule 1315 – Federal New Source Review Tracking System (July 10, 2007) at 4-1. The District acknowledges that standby diesel generators are “old” and “high-polluting,” and reducing their use further “avoids an increase in criteria pollutant and toxic emissions.” *Id.* at 2-19.

2-8
 Con’t

In sum, the integration of new power plants into the South Coast Basin fleet ultimately will result in fewer criteria pollutant, toxic, and greenhouse gas emissions. The District’s approval of the proposed project as-is will alter the status quo by denying power plants access to crucial credits, potentially triggering significant adverse environmental impacts.

III. DISTRICT STAFF IS USURPING AUTHORITY OF THE GOVERNING BOARD.

By defining the proposed project as it does, staff is usurping the Governing Board’s policy authority and unduly circumscribing the Governing Board’s discretion to consider and approve project alternatives. CEQA gives a lead agency authority, consistent with its available powers, to adopt a project alternative rather than the proposed project. Pub Res Code §§ 21002-21002.1, 21004; 14 CCR §15002(a). A lead agency is not required to grant a “blanket approval” of the proposed project described in an EIR or PEA; rather, decision-makers can approve an alternative to the project as proposed because they have “the flexibility to implement that portion of a project that satisfies their environmental concerns.” *Sierra Club v City of Orange*, 163 Cal. App. 4th 523, 533 (2008).

The Governing Board, the pertinent decision-makers, could make a policy choice to leave Rule 1309.2 as-is. As such, the PEA should evaluate the environmental implications of such a decision as a project alternative in order to aid the Governing Board’s deliberations. However, District Staff is doing exactly the opposite. District Staff is engineering a situation where the Governing Board would encounter intense pressure to approve the project as-is.

2-9

If the PEA neglects to evaluate an alternative that does not amend Rule 1309.2, the Governing Board would face a scenario where the PEA would arguably not be adequate to support a policy decision to maintain power plant access to the Offset Budget. Under such a scenario, the Governing Board would be offered a Hobson’s choice: either (1) approve the project as-is; or (2) trigger months of delay as the PEA is rewritten to evaluate power plants potentially accessing the Offset Budget. Given the demonstrated need for the District to speedily repair its ability to administer its NSR program, as evidenced by the District-wide Permit Moratorium announced in January 2009, the Governing Board could be compelled to acquiesce to the staff’s preemptive policy choice. Staff is impermissibly stripping the Governing Board of its authority under CEQA to adopt project alternatives.

Mr. Michael Krause
April 15, 2009
Page 7

LATHAM & WATKINS^{LLP}

Thank you for your attention to this matter. Please do not hesitate to call me if you have any questions.

Best regards,

A handwritten signature in cursive script, appearing to read "Mike Carroll".

Michael J. Carroll
of LATHAM & WATKINS LLP

Enclosure

Responses to Draft NOP/IS Comment Letter #2

Latham & Watkins LLP
Michael J. Carroll

April 15, 2009

Response 2-1

The commentator is correct that the current SCAQMD policy decision is to not re-amend Rule 1309.1 – Priority Reserve, defining electric generating facilities (EGFs) as essential public services, thus, not allow EGFs access to the Priority Reserve. As discussed in the Initial Study, the Los Angeles County Superior Court enjoined the SCAQMD from undertaking any actions to implement the “2007 Project” (i.e., proposed Rule 1315 and amended Rule 1309.1) pending CEQA compliance. Thus, a permit moratorium was triggered for those projects relying on the SCAQMD internal offset accounts, which constitutes Rule 1309.1 priority reserve, Rule 1309.2 offset budget and Rule 1304 offset exemptions. Because the court required CEQA analysis on the usage of credits from the SCAQMD internal offset accounts, credits from the priority reserve were included because priority reserve is an SCAQMD internal offset account. Because no inclusion of EGFs as an essential public service is being proposed, the PEA does not analyze impacts from the siting, constructing and operation of power plants as direct impacts of the project. However, it should be noted that equipment located at power plant facilities that qualify for a Rule 1304 offset exemption could be provided offsets from that SCAQMD account. Contrary to the commentator’s opinion, these policy decisions are not flawed or counterproductive, but rather responsive to the court decisions and reflective of the SCAQMD’s discretion. Also, the PEA includes an analysis of reasonably foreseeable power plants as part of the cumulative impacts analysis.

Alternatives should “feasibly attain most of the basic objectives... but would avoid or substantially lessen any of the significant effects” [CEQA Guidelines § 15126.6(a), (b)]. Allowing power plants access to the offset budget would not lessen any significant effect. The PEA does examine the potential environmental impacts of not approving the project through the No Project Alternative. The concept of analyzing the impacts from denying the power plants access to the offset budget is not warranted because more recently, Rule 1309.2 has been completely rescinded. Because the 2007 power plant amendments to Rule 1309.1 have been set aside by the court and subsequently repealed, the baseline conditions are that power plants do not have access to offsets under either Rule 1309.1 or Rule 1309.2. Therefore, the SCAQMD does not need to analyze those impacts.

Response 2-2

See Response 2-1 regarding the consideration of a fossil fueled power plant alternative. Project alternatives are chosen based on feasibility to attain the project objectives and their potential to lessen any of the significant effects [CEQA Guidelines § 15126.6(a),(b)]. The proposed project alternatives meet these parameters. Project objectives are based on SCAQMD policy and clearly listed on page 1-16 of the Initial Study under the title “Project Objectives” as required by CEQA Guidelines § 15124(b). Earlier references as to why the SCAQMD is proposing the project can be found under the “Legislative Authority” discussion with regards to implementing the NSR program, and is not a reference to the project objectives. An alternative which allowed fossil fueled power plants access to internal offset accounts would not lessen any significant environmental impact.

Response 2-3

See Responses 2-1 and 2-2 with regard to a project alternative that would not exclude large power plants to access the offset budget.

Response 2-4

As discussed in Response 2-1, an alternative to include fossil fueled power plants was considered but not carried forward for detailed analysis. Taking no action, as suggested by the commentator, is considered under the No Project Alternative. As such, the No Project Alternative does evaluate the effects from not implementing a federal tracking system (Rule 1315). However, Rule 1309.2 has now been rescinded.

Response 2-5

The SCAQMD staff agrees with the commentator that new, cleaner, more efficient equipment provides environmental benefit for air quality and energy as compared to an increased usage of older, dirtier equipment. The proposed project does not completely restrict new power plants from coming on-line because operators have the option to obtain offsets from the open market to permit their facility and because some power plant projects can still qualify for Rule 1304 exemptions. Also, as discussed in Response 2-1, a fossil fueled power plant alternative was considered but determined to be infeasible.

Response 2-6

As discussed in Response 2-1, a fossil fueled power plant alternative was considered but not carried forward for detailed analysis.

Response 2-7

In crafting project alternatives, SCAQMD staff examined the major components of proposed Rule 1315 and five alternatives, including the no project alternative, are further evaluated in the alternatives section. All of the alternatives addressed policy implications as well as the ability to avoid significant adverse environmental impacts if implemented. One of the alternatives determined not to substantially reduce environmental effects was a fossil fueled power plant alternative. The reasons for not evaluating such an alternative further are discussed in Response 2-1.

Response 2-8

As discussed in Responses 2-4, 2-5, and 2-6, taking no action is evaluated under the No Project Alternative. Also, the proposed project does not restrict large power plants from being built because it does not alter the status quo.

Response 2-9

The SCAQMD Governing Board has already made its policy decision by rescinding Rule 1309.2 in its entirety.



RIVERSIDE COUNTY
FIRE DEPARTMENT
In cooperation with the
California Department of Forestry and Fire Protection

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Fire Chief

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District 5

April 22, 2009

South Coast Air Quality Management District
Michael Krause
21865 Copley Drive
Diamond Bar, CA 91765-4182

Re: Notice of Preparation of a Draft Program Environmental Assessment

Project Title: Adoption of Proposed Rule 1315-Federal New Source Review Tracking System, and Proposed Amendments to Rule 1309.2-Offset Budget.

Dear Mr. Krause,

Thank you for allowing the Riverside County Fire Department to review the Notice of Preparation for the adoption of proposed Rule 1315.

With respect to the referenced project, the Riverside County Fire Department has no comments.

Sincerely,

Jason Neuman

Fire Captain
Strategic Planning
Riverside County Fire Department
(951) 940-6349

Responses to Draft NOP/IS Comment Letter #3

**Riverside County Fire Department
Jason Neuman**

April 22, 2009

Response 3-1

The SCAQMD staff appreciates the review of the NOP/IS by the Riverside County Fire Department and acknowledges that no comments on the Draft PEA were submitted.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

August 3, 2009

Mr. Michael Krause
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765-4182

Dear Mr. Krause:

**Notice of Preparation of Draft Program Environmental Assessment (DPEA)
for PR 1315 and PAR 1309.2**

The Sanitation Districts wish to clarify our earlier letter written in response to your release of the Notice of Preparation for the DPEA on the subject rules on March 13, 2009. In our Initial Study comments, we raised the concern that future projects may be so innovative, particularly those dealing with climate change, that a historical look back would not capture the projects' idiosyncrasies. As indicated in our earlier letter, we canvassed our trade association members to develop a short list of such projects likely to be carried out. We concluded, however, that no innovative projects could be identified in sufficient detail at this time. Many of the proposals on renewable energy production envisioned in our letter are speculative at this time and could take several years and many dollars before they come to fruition. These are university-research level theories and studies for the most part.

4-1

The Sanitation Districts interpret the Notice of Preparation to include consideration in SCAQMD's analysis of the flow of credits to those future projects that comport with SCAQMD's permitting procedures that are in effect at that time, including the New Source Review rules. Based on this interpretation, the Sanitation Districts have no objections to the use of past projects as a means of estimating future potential impacts from the proposed rules.

4-2

Very truly yours,
Stephen R. Maguin

Gregory M. Adams
Assistant Departmental Engineer
Air Quality Engineering
Technical Services Department

GMA:bb

cc: John Pastore – SCAP
Paul Beck – Lewis, Brisbois, Bisgaard & Smith LLP
Ray Barrera – Lewis, Brisbois, Bisgaard & Smith LLP

Responses to Draft NOP/IS Comment Letter #4

**County Sanitation District of Los Angeles County
Gregory M. Adams**

August 3, 2009

Response 4-1

The SCAQMD staff appreciates that the follow-up to the commentator's March 13, 2009, letter expressing concern over whether a historical look at past projects would not reflect future projects that could be innovative and new. As noted in your comment letter, after canvassing trade association members for a shortlist of innovative projects, sufficient details could not be provided for inclusion in the analysis of projects in the Draft PEA. The SCAQMD strongly supports actions taken to reduce greenhouse gases, as well as renewable energy production and water recycling projects. The proposed project will not affect these future projects. Further, with regard to CEQA compliance, it is anticipated that these innovative projects will be still be subject to CEQA requirements in the future so siting, constructing and operating of the projects will be evaluated for potential environmental impacts at a later date when more sufficient details are available.

Response 4-2

The SCAQMD staff appreciates the support from the Los Angeles County Sanitation District to use the past projects as a means of estimating future potential impacts from the proposed rules.

APPENDIX C

AIR QUALITY ANALYSIS

Air Quality Analysis for SCAQMD
Proposed Rule 1315

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Appendices

Appendix C1: Permit Category Crosswalk

Appendix C2: Screening-Level (SCREEN3) Assessment: Supporting Information

Appendix C3: Meteorological Zone Analysis

Appendix C4: Refined (AERMOD) Assessment: Supporting Information

Acronyms and Abbreviations

AF	Adjustment factor
AV30	30-day average
BCAT	Basic category
CARB	California Air Resources Board
CCAT	Control category
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulation
CO	Carbon monoxide
DPM	Diesel Particulate Matter
EVF	Exposure value factor
FIPS	Federal information processing standards
g	gram
HI	Hazard Index
K	Kelvin
km	kilometer
LST	Localized significance threshold
m	meter
MBTU	One million British Thermal Units
MM5	Fifth-generation NCAR/Penn State Mesoscale Model
MP	Multipathway factor
MW	megawatt
NEI	National Emissions Inventory
NO ₂	Nitrogen dioxide
PEA	Programmatic environmental assessment
PM	Particulate matter
PVMRM	Plume Volume Molar Ratio Method
REL	Reference exposure level
ROG	Total organic gases
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCC	Source Classification Code
SO ₂	Sulfur dioxide
TOG	Reactive organic gases
USEPA	U.S. Environmental Protection Agency

1 Introduction

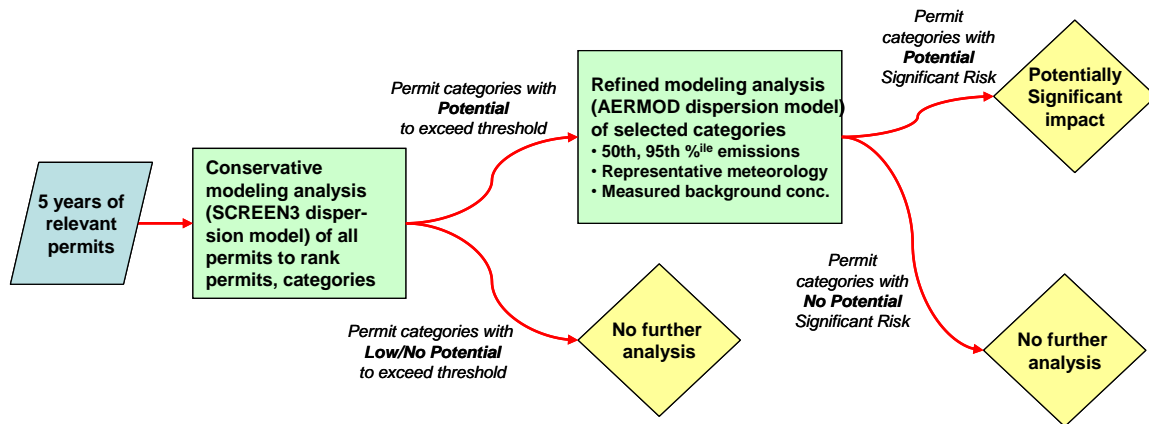
This document describes the methods and results of the technical analyses conducted in support of the evaluation of impacts on air quality in the vicinity of individual facilities resulting from air emission permits awarded under South Coast Air Quality Management District (SCAQMD or the District) Rule 1315. The methodology, key inputs, modeling outputs, and impact determinations are presented in this document, in support of the conclusions regarding air quality impacts as presented in this programmatic environmental assessment (PEA).

The approach used to evaluate future potential impacts of the proposed project at individual facilities (also referred to as the “local” analysis in the PEA) is summarized in Figure 1. In the absence of information about specific facilities that will (in the future) be affected by the rule modification, this evaluation was made on the basis of air dispersion modeling of recently permitted emissions of actual facilities. Modeling of existing permitted emissions was intended to provide an estimate of the potential impacts of anticipated criteria pollutant emission increases in the near vicinity of individual facilities as a result of future permits awarded under the proposed project. A key assumption inherent to this approach is that previously-permitted sources are representative of the types of sources that will be permitted in the future under this rule (and that the mass and type of air pollutants emitted by these sources will be similar to previously permitted emissions). This assumption appears reasonable as there is no known factor that would significantly change the types of permits issued in the future from those issued in the past.

Emissions and available characteristics regarding type of emission source (e.g., source category) were tabulated from a five year data set of all past (for the years 2003 through 2008) and pending SCAQMD air emission permits covered under Rule 1315 with access to offsets under Rules 1304 and 1309.1 and facilities that would have had access to Rule 1309.2 if it had been in effect. Since the analysis was performed, Rule 1309.2 has been repealed. Nevertheless, since Rule 1309.2 would have allowed virtually any type of facility to receive offsets from the District’s internal offset account, including an analysis of potential Rule 1309.2 facilities represents a conservative (i.e., worst case) analysis. Given the relatively large size of the data set (51,265 pollutant records¹ affecting 12,315 permits), an iterative approach was employed to evaluate the potential for significant impacts. First, the permits were grouped into categories based on release characteristics (e.g., stack parameters) so that similar source types were grouped together. Then an analysis was conducted by applying a screening-level air dispersion model (SCREEN3) to each permit and ranking the categories. The model was used to rank and prioritize permit categories on the basis of maximum ambient exposure. The results of this analysis were used to inform the selection of a smaller set of permit categories for further, more refined analysis intended to estimate impacts.

¹ The original pollutant record list totaled 89,314 records, however, it was discovered that a majority of the pollutants were listed twice with different units –one daily and one hourly. When the list was regenerated to eliminate the duplication, the revised pollutant record list totaled 51,265 pollutant records.

Figure 1. Process for Selecting Permits for Refined Analysis



The refined analysis was conducted on this subset of permits to evaluate the potential for significant impacts. A refined air dispersion model (AERMOD) was used to estimate the short- and long-term maximum ambient concentrations of criteria pollutants associated with selected permitted emissions. Input parameters for modeled sources were defined such that a reasonable worst-case potential human exposure scenario for each permit category was evaluated. However, refinements were implemented to reduce the conservatism included in the screening-level modeling. More refined aspects of the AERMOD analysis included the following refinements:

- use of an ozone-dependent method for converting NO_x to NO_2 based on the NO_x within the plume and the ozone contained within the volume of the plume between the source and receptor (Plume Volume Molar Ratio Method [PVMRM]);
- use of three years of meteorological data for locations within the SCAQMD boundaries; and
- use of specific meteorological station locations selected on the basis of statistical evaluations designed to ensure that reasonable worst-case conditions were evaluated.

The overall approach thus takes into account the possibility of future permits being awarded across a wide range of geographic locations within the District.

Modeled criteria pollutant concentrations estimated by AERMOD were compared to SCAQMD localized significance thresholds (LSTs) to evaluate air quality impacts. Potential impacts from both short- and long-term exposures were evaluated using different averaging times for outputs and corresponding thresholds. Average long-term operational emissions associated with permitted sources were also compared to SCAQMD operational emission significance thresholds to provide an additional metric of the potential for significant impacts.

The sections that follow provide a more detailed overview of the local impact analysis for this environmental assessment. A description of the emissions data that are the basis for this analysis is presented in Section 2, along with descriptions of processing conducted to

prepare the emissions data for modeling and estimating impacts. Significance criteria used to evaluate modeled air quality impact results are presented in Section 3. Because these criteria were used in both the screening and refined components of this analysis, they are presented separately in this section of the document. Descriptions and explanations of the dispersion models used in the assessment, model inputs and options, and model outputs for the screening-level and refined analyses are presented in Sections 4 and 5, respectively. Predicted air quality impacts are presented in Section 6, and references cited in this report are listed in Section 7. Supporting technical information related to this assessment is also provided in Appendices C1 through C4 of this report.

2 Development of Emission Scenarios

To develop the representative data set for this evaluation, emissions data were collected for existing permits that would be representative of future projects that will be subject to the proposed project. Permits were obtained with the assistance of District staff from SCAQMD permit files.

Air pollutants permitted for emissions included criteria pollutants, including particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO), oxides of nitrogen (NO_x), and oxides of sulfur (SO_x) and reactive organic gases (ROG). Only primary pollutant emissions included in the permit were included in this analysis; no pollutants formed as secondary reaction products were evaluated, with the exception of NO₂ production from NO_x (Section 5.2). Secondary pollutants (created due to the reaction of pollutants in the atmosphere) do not create localized impacts. However, they are evaluated in the regional air quality analysis.

To facilitate the analysis of over 12,000 permits, each permit was assigned to a permit category (Section 2.2.1) and crosswalked² to a Source Classification Code (SCC; Section 2.2.2). SCCs were used for two purposes in this analysis: (1) to assign stack parameters to emission sources for modeling on the basis of source type; and (2) to estimate chemical speciation of permitted emissions reported as PM and organic gases (with respect to particle size composition of PM emissions (Section 2.2.3).

This analysis was intended to evaluate only local (i.e., permit-specific) impacts potentially resulting from operational emissions of permitted sources. Analyses of impacts of other project-related emissions, such as emissions from equipment and vehicles during facility construction, are described in the PEA main report.

2.1 Source of Emissions Data

As noted in Section 1, it was assumed that permit actions from the recent past and pending permit actions that used or will use credits tracked under Rules 1315 and which would have been eligible for Rule 1309.2 had it been in effect are representative of the types of emissions that would be permitted in the future and tracked under the proposed

² Individual permit process characteristics (i.e., the basic category (BCAT) and control category (CCAT) descriptions in the permit database) were “crosswalked” by matching Source Classification Code (SCC) descriptions to unique BCAT/CCAT descriptions. The SCC code description that best matched the BCAT/CCAT code description was used to assign an SCC code to each permit. Please see Section 2.2.2 and 4.2 for additional details.

project. The permit data provided by the District for this analysis originated from the following three categories:

- Permits issued during the previous five years (from September 8, 2003, to November 4, 2008) that would be covered under 1315 because they were permitted either using offset exemptions (Rule 1304) or as an essential public service (Rule 1309.1) (9,726 permits at 7,196 facilities).
- Permits issued during the previous five years that would have been covered under Rule 1315 because they could use credits from the offset budget under Rule 1309.2 (339 permits at 200 facilities).
- Permit applications SCAQMD had in-hand, currently pending approval that would be covered under 1315 (2,250 permits at 336 facilities).

In total, 12,315 permits from 7,732 facilities were included in the original combined data set used in this analysis. These permits are summarized in Table 1.

Table 1. Summary of 5-year Data Set

Permits in Full Data Set	
Total permits	12,315
Unknown permits ^a	560
Zero emission permits	1,151
Other permits removed	2
Total permits used in analysis ^b	10,602
Unique facilities	7,732
Permits for Individual Pollutants	
Carbon monoxide (CO)	2,818
Nitrogen oxide (NO _x)	4,226
Particulate matter (PM10/PM)	3,328
Sulfur oxide (SO _x)	427
Total/reactive organic gases (TOG/ROG)	7,932

- a) If no BCAT or CCAT code was included in the raw data set for a permit, all records for that permit were assigned to the “unknown” permit category.
- b) Unknown permits and zero-emission permits were not used in this analysis, and two additional permits were removed after further analysis; see Section 2.2.

2.2 Processing of Permit Data for Evaluation

This section describes the processing conducted on the data set prior to any modeling. Permit data were prepared for analysis by removing any “unknown permits” (see Section 2.2.1 a definition of these permits) and records with zero emissions (i.e. those entries for which a facility reported zero emissions for a specific pollutant). Individual permits were then assigned an SCC and grouped into permit categories.

2.2.1 Permit Categories

In order to better organize the thousands of permits into representative groupings, permits were grouped into permit categories. This was done according to process characteristics identified on the basis of basic category (BCAT) and/or control category (CCAT) codes associated with individual permits. A list of the 111 unique permit categories and the number of permits in each category is presented in Table 2. These permit categories were used throughout the analysis.

If no BCAT or CCAT code was included in the raw data set for a permit, all records for that permit were assigned to the “unknown” permit category and subsequently removed from the analysis. Permits in the unknown category were removed from the analysis because without easily-accessible information on source type, reasonable defaults for stack parameters could not be assigned. A total of 562 permits (5 percent of the permit data set) were lacking both BCAT and CCAT codes and were assigned to the “unknown” category and removed from the analysis.

Table 2. Permit Categories Assigned for this Analysis

Permit Category	No. of Permits	Permit Category	No. of Permits	Permit Category	No. of Permits
Spray Booth and Equipment	2,494	Drying	26	Alkylation	3
Tanks and Storage	1,857	Semiconductor	24	Biofilter	3
Internal Combustion Engine	1,299	Sludge	19	Carbon Filer	3
Dry Cleaning	768	Classification	18	Collection	3
Soil Treat Vapor Extract	654	Vapor Recovery	17	Cooling Tower	3
Oven	487	Roasting	15	Degreaser	3
Boiler 10 - 50 MBTU	339	Scrubber	15	Dry Filter	3
Heater/Furnace	253	Catalytic Reduction	13	Pillow Filling Machine	3
Boiler < 10 MBTU	231	Boiler > 50 MBTU	12	Screening	3
Blending	197	Evaporator	11	Calcining	2
Printing	192	Laundry Tumbler	11	Composting	2
Equipment Process	122	Tire Buffer	11	Cyclone	2
Afterburner	119	Agriculture Operations	10	Deposition	2
Blasting	95	Cleaning	10	Distillation	2
Tar Pot	86	Cogeneration	10	Fractionation	2
Bulk Load/Unload	68	Coffee Roasting	9	Hydrodesulfurization	2
Waste Water	62	Molding	9	Incineration	2
Asphalt	60	Rubber Production	9	Isomerization Unit	2
Production/Crushing	59	Stripping	9	Melting	2
Flare	58	Carpet/Textiles Processing	8	Mesh Pad	2
Separation	57	Flowcoater	8	Retort	2
Treating	53	Odor Control	7	Tail Gas Incinerator	2
Deep Fat Fry	47	Circuit Board Etchers	6	Adhesives	1
Turbine Engine > 50 MW	46	Reclamation	6	Amine	1

Table 2. Permit Categories Assigned for this Analysis

Permit Category	No. of Permits	Permit Category	No. of Permits	Permit Category	No. of Permits
Crematory	45	Shredder	6	Autoclave	1
Soldering	42	Adsorption	5	Catalyst	1
Turbine Engine < 5 MW	40	Baghouse	4	Desalinization	1
Turbine Engine 5 - 50 MW	38	Condenser	4	Electrostatic Precip.	1
Drop Forge	37	Cracking	4	Fumigation	1
Extruder	37	Dehydration	4	Glass Manufacturing	1
Food Processing	34	Fueling	4	Meat Products	1
Reduction	33	Garnetting	4	Manufacturing	1
Oxidizer	32	Gas Plant	4	Pelletizing	1
Activated Carbon Adsorber	30	Hydrotreating Unit	4	Plating	1
Coating	28	Laser	4	Railroad unloading	1
Conveying	28	Mist Control	4	Research Operations	1
Packaging	28	Plasma Arc Cutting	4	Weigh Station	1
Reaction	28	Air Filter	3		

MW = Megawatt, MBTU = 1 million British Thermal Units

2.2.2 Source Classification Codes

Stack parameters were required for both screening and refined modeling scenarios of individual permits. Process-specific stack parameters were not readily available for individual permits from the SCAQMD. In order to assign stack parameters, and also to speciate permitted emissions, permits were crosswalked to SCCs on the basis of their BCAT and/or CCAT codes.³

SCCs are codes defined for specific types of emission sources by the U.S. Environmental Protection Agency (USEPA) on the basis of emission release point characteristics, the process an emission point is associated with, and other attributes unique to a specific type of emission source. Average or typical stack parameters can be derived for a given type of source using existing USEPA and other databases that contain SCCs. For example, in their National Emissions Inventory (NEI), USEPA has developed SCC-specific default stack parameters (stack height, stack diameter, exit gas velocity, and exit gas temperature) that are used in quality-assurance and gap-filling routines conducted in the development of this national-scale inventory.⁴

³ In all cases, a set of permits with a unique combination of BCAT and CCAT codes were assigned to a single “permit category” as described in the previous section. However, because of the diversity of release point characteristics for sources included in some permit categories, SCCs (and, consequently, stack parameters and speciation factors) were assigned to unique BCAT/CCAT combinations, not unique permit categories. In other words, a single BCAT/CCAT combination was assigned a single SCC, but multiple combinations of BCAT/CCAT (and therefore multiple SCCs as well) were in many cases assigned to a single permit category.

⁴ For additional information on USEPA’s National Emission Inventory, see <http://www.epa.gov/ttn/chief/eiinformation.html>.

SCCs were assigned to permits and used to define the stack parameters used in the screening-level modeling. This SCC crosswalk was then used as the starting point for determining appropriate stack parameters for permit categories included in the refined modeling. Refer to the relevant text in Sections 4 and 5 for additional information on assigning stack parameters using SCCs.

The SCCs assigned to permits were also used as the basis for speciating permitted emissions of PM and organic gases. Some additional processing was required for this step, as explained in the following section.

2.2.3 Chemical Speciation of Emissions

This section describes speciation calculations conducted for permitted emissions in the data set. The California Air Resources Board (CARB) has developed speciation profiles that describe the chemical composition of emissions reported as PM or TOG.⁵ Speciation profiles in the CARB database have been developed for a range of SCCs, and therefore SCCs could be used to assign a CARB chemical speciation profile to a reported PM or TOG emission value in the permit data set. Factors associated with these speciation profiles were used to estimate the emissions of size-specific PM fractions (from emissions of total PM).

The SCCs assigned for stack parameter analysis were used in cases where a match was found within the speciation database. In some cases, however, the SCC assigned to a permit record for the purposes of assigning stack parameters (as described in the previous section) was not included in the CARB speciation profiles (i.e., the CARB database does not include every SCC). In these cases, an additional SCC was assigned for speciation to individual TACs. The original assigned SCC was retained for assigning default stack parameters.

Particulate Matter

Of the criteria pollutants evaluated in this analysis, emissions of NO_x, SO_x, and CO were not modified before conducting modeling or analysis. Emissions of PM were reported in SCAQMD permit records as either “PM” or “PM10”. The CARB speciation profile for the assigned SCC was used to convert total particulate matter (reported as “PM” in the permit data base) to PM10. The following equation was used to convert PM to PM10:

$$PM10 \text{ Emissions} = PM \text{ Emissions} * wfracpm10_{SCC}$$

where the parameter $wfracpm10_{SCC}$ is the weight fraction of PM that is PM10 for a given SCC.

Emissions reported as PM10 were not altered. Since PM2.5 is a subset of PM10, the fraction of PM that is PM2.5 is always equal to or less than PM10. Because SCAQMD air quality significance thresholds are the same for both PM10 and PM2.5, only permits that exceed the PM10 ambient air threshold have the potential to exceed the PM2.5 threshold of significance. For efficiency, permits were evaluated for their impact with

⁵ The CARB speciation profiles and supporting information for these data can be found at <http://www.arb.ca.gov/ei/speciate/speciate.htm>.

respect to PM10, and these results were judged to also represent the impacts with respect to PM2.5.

2.2.4 Temporal Characteristics of Emissions

For criteria air pollutants, the monthly (30-day average [AV30]) permitted emissions values in pounds per day were used to evaluate long-term (>24-hour) air quality impacts. Permit-specific operation schedules were used to scale the monthly AV30 permitted emissions to evaluate short-term (< 24-hour) air quality impacts. For more information on scaling permitted emissions, see Section 4.2.4.

3 Significance Criteria

SCAQMD has established thresholds to determine the significance of ambient air quality impacts from proposed land use development projects (SCAQMD 2006). Because these thresholds were used in both the screening-level-ranking analysis and the refined modeling analysis used to assess the significance of impacts, they are discussed in this section of this appendix prior to the discussion of the analyses conducted to estimate impacts.

3.1 Air Quality

Ambient concentration thresholds for criteria pollutants in the SCAQMD are presented in Table 3. The PM values reported here are incremental thresholds. The other criteria presented here are absolute thresholds that are intended for comparison with total (i.e., incremental plus background) concentrations. Operational emission thresholds have also been developed by the District. These thresholds are presented in Table 4.

Table 3. SCAQMD Thresholds for Ambient Air Quality Concentrations

Air Pollutant	Ambient Concentration Threshold
Nitrogen dioxide (NO ₂)	
1-hour average	0.18 ppm (338 µg/m ³)
Annual average	0.03 ppm (56 µg/m ³)
Particulates (PM ₁₀ or PM _{2.5})	
24-hour average	2.5 µg/m ³
Annual average	1.0 µg/m ³
Carbon monoxide (CO)	
1-hour average	20 ppm (23,000 µg/m ³)
8-hour average	9.0 ppm (10,000 µg/m ³)
Sulfur Dioxide (SO ₂)	
1-hour average	0.25 ppm (655 µg/m ³)
24-hour average	0.04 ppm (105 µg/m ³)

-
- a) The NO₂, SO₂, and CO thresholds are absolute thresholds; the maximum predicted impact from permitted emissions is added to the background concentration for the project vicinity and compared to the threshold.
 - b) The particulates (PM₁₀ and PM_{2.5}) threshold is an incremental threshold to which no background concentration is added for impact determination.
-

Table 4. SCAQMD Operational Emission Rate Thresholds of Significance

Air Pollutant	Operational Emissions Threshold (pounds/day)
Volatile organic compounds (VOCs)	55
Carbon monoxide (CO)	550
Nitrogen oxides (NO _x)	55
Sulfur oxides (SO _x)	150
Particulates (PM10)	150
Particulates (PM2.5)	55

4 Screening-level Analysis (SCREEN3)

The objective of the screening-level component of the analysis was to develop a manageable set of representative permit records that could be used to characterize a reasonably foreseeable worst-case set of air quality impacts for potential future projects that may be permitted as a result of the proposed project. The screening evaluation was conducted using a conservative but realistic approach to identify permitted sources of greatest concern. Using this approach was likely to overestimate the actual air quality impacts associated with the project, but (more importantly at this stage in the assessment) was unlikely to underestimate impacts. The outcome of this ranking analysis was not used to quantify impacts, but rather was conducted to identify permit categories for more refined dispersion modeling (Section 5). The results of the refined analysis were subsequently used to estimate the local air quality impacts of individual permits eligible under the proposed project (Section 6).

4.1 Approach and Selection of Model

The purpose of this component of the evaluation was to narrow the full 5-year data set of over 12,000 permits to a manageable subset of permits that could be evaluated in the refined analysis. USEPA’s SCREEN3 dispersion model was employed to develop metrics for ranking permits.⁶ SCREEN3 is a single source Gaussian plume model that provides maximum 1-hr ground-level concentrations for point, area, flare, and volume

⁶ Additional information on SCREEN3 can be found at http://www.epa.gov/scram001/dispersion_screening.htm#screen3.

sources, as well as concentrations in the cavity zone, and concentrations due to inversion break-up and shoreline fumigation. This model was employed in the screening-level ranking analysis because it could be used to efficiently derive a conservative estimate of off-site exposure for all permitted emissions in the data set. The results for criteria pollutants were then evaluated in conjunction with significance criteria to select permits for refined modeling.

4.2 Model Inputs and Options for SCREEN3

Stack parameters specific to each permit that were required for SCREEN3 modeling included:

- Emission rates
- Emission release heights
- Emission release diameters
- Emission release temperatures
- Emission release velocities

Inputs for these parameters were developed primarily using the SCCs assigned to each permit, as described below. SCAQMD defaults were used for receptor height, ambient air temperature, and meteorological settings. The meteorological option selected allowed the model to run through all stability classes and wind speeds and report the highest ground-level concentration estimated for a stack with the specified parameters. An urban setting was used to represent the urban Los Angeles environment. Other modeling inputs required by SCREEN3 were defaulted to appropriate reasonable or conservative values as described in the following sections.

4.2.1 Point Sources

All permits were modeled as point sources except permits specifically identified in the BCAT or CCAT code description as flares (any permit with the term “flare” in the BCAT or CCAT code was assumed to be a flare).

As noted in Section 2.2.2, SCCs were used to assign default values for the four stack parameters used in the SCREEN3 modeling. In order to assign SCCs for each of the thousands of SCAQMD permits included in the data set used for the screening-level analysis, a search tool was created. This tool assisted in identifying relevant SCCs for the BCAT and/or CCAT codes associated with each permit, using an automated process that identified terms found in (or related to) the BCAT and CCAT descriptions. An appropriate SCC was then manually assigned to each permit record by selecting the “best fitting” SCC description from the matches and close matches generated by the automated cross-walking routine. In general, where multiple SCCs were relevant but an exact match could not be made, a conservative approach was used to assign an SCC, usually on the basis of the default stack parameters associated with a given SCC (for example, an SCC with a lower default stack height would be preferentially selected, all other factors being equal, because lower stack heights generally result in higher ground-level ambient concentrations).

Default stack parameter values were derived using records for point sources included in USEPA's 2002 National Emissions Inventory (NEI). The 2002 NEI for point sources was queried on the basis of Federal information processing standards (FIPS) codes to pull out all records for sources located within (or close to) SCAQMD boundaries (i.e., records with FIPS codes 06037, 06059, 06065, or 06071). Then, within this subset of NEI records, the arithmetic average value for the four parameters of interest was calculated for each SCC. For this process, it was required that at least five individual stack-specific records be available to assign average stack parameter values. In cases where less than five records were available within the SCAQMD subset of NEI records, average values were calculated using all California NEI records (i.e., records with FIPS code 06) instead. If the number of California-specific records was also less than five, the NEI's national default stack parameters developed by USEPA for each SCC were used. For the 2002 NEI, these national-level NEI defaults are equal to the median stack parameter values of all stacks in the 1999 point source NEI assigned to a given SCC.

Because the initial assignment of SCCs to permits for the purposes of defining stack parameters was intentionally conservative, an iterative methodology was used to reduce overly conservative assignments. In cases when a permit was assigned highly conservative stack parameters (such as a very short stack height) on the basis of default values for the assigned SCC, additional research was conducted to determine whether the assigned stack parameters were appropriate. This included researching additional information on the process associated with the BCAT or CCAT code (e.g., from information on emissions and emission factors, such as that compiled in USEPA's AP 42 chapters, or from general descriptions of industrial processes published by trade groups), as well as reviewing example permits to determine the most appropriate stack parameters for the codes under review. Although this detailed level of analysis could not be performed for all permits due to the number of permits evaluated, a reasonable effort (taking into account the timeframe and resources available) was made to evaluate all of the most conservative SCC assignments. Table C1-1 of Appendix C1 lists the Permit Categories and SCCs used throughout the analysis and the BCAT/CCAT code associated with each SCC.

The maximum distance of interest was set at 10,000 m for point sources. Table C2-1 of Appendix C2 lists the input parameters used for the point source SCREEN3 analysis.

4.2.2 Flares

Flares are modeled differently from other point sources in SCREEN3 to account for the additional buoyancy from the high temperature. Any BCAT/CCAT code that included the term "flare" in the description was grouped into the flare permit category and modeled separately. The most important difference between point and flare source categories in SCREEN3 is that plume rise for flares is calculated based on the thermal effects of the flame that result in lift and expansion of the plume. This is included by calculating an effective release height and an effective stack diameter that is based on an assumed exit velocity of 20 m/s and flare temperature of 1,273 K and the heat of release, rather than a combination of buoyancy and momentum flux. Thus, the user is required to input a heat release rate rather than a release diameter, temperature, and velocity. Because the total heat release rate is not included in SCAQMD permit data, a Landfill Gas Flaring System was selected to be a representative "flare" permit and was used to derive an average flare heat release rate. A maximum distance of interest was set to

10,000 m for flares. The input parameters for flares can be found in Table C2-2 of Appendix C2.

4.2.3 Fenceline

An important input during the screening phase was the distance to the facility fenceline (i.e., the distance between the modeled source and the edge of the facility boundary where off-site impacts can occur). The distance to the fenceline is defined by the user for a SCREEN3 simulation to determine the minimum distance from the source at which the model will report ambient air concentrations. For example, if a dry cleaner is located on a city street in Los Angeles, the distance to an individual exposed at an offsite location is expected to be smaller than the distance between emission sources at a large petroleum facility and the facility's fenceline. The distances to fenceline were assigned for each permit category, based on the general characteristics of the facilities at which the sources in that category would be located. In most cases, a distance to fenceline of 50 m was used. Fifty meters is consistent with SCAQMD's guidance on performing the analysis from individual facilities for obtaining emission permits (SCAQMD, 2005). For some permit categories where the source could be located in close proximity to people (e.g., tar pots), a fenceline of 10 m was used. Table C2-3 of Appendix C2 lists the fenceline used for each permit category in the screening analysis.

In some cases, a permit category contained a variety of BCAT and CCAT codes, and it was not possible to assign a single representative fenceline. In general, a fenceline of 50 m was used for large facilities. If a source was expected to be located at a very small facility, 10 m was used. The fenceline for the flare permit category was set at 50 m, which is consistent with other analyses.

4.2.4 Emission Rate and Timescale

Using the AV30 emission rate for dispersion modeling implicitly assumes the facility is operating for fifty-two weeks per year, seven days per week, and twenty-four hours per day. While this approach is appropriate for evaluating impacts from long-term exposures, it does not appropriately capture short-term impacts. Consequently, SCREEN3 output concentrations were scaled to account for actual operating hours for each permit.

To estimate short-term maximum concentrations, SCREEN3 concentration predictions based on AV30 emission rates were adjusted for short-term variations using operating schedules obtained from SCAQMD for each permit. The adjustments were made with short-term emission scaling factors calculated as follows:

$$\text{Scaling factor for short-term emissions} = (7 \text{ days per week} / \text{number of operating days per week}) * (24 \text{ hours per day} / \text{number of operating hours per day})$$

For example, when a facility operates its equipment for 5 days per week, 8 hours per day, the emissions will be scaled by $(7/5) * (24/8)$, or by a factor of 4.2.

4.2.5 Background Concentrations

As noted in Section 3.1, for all criteria pollutants except PM10, the SCAQMD thresholds for the California Environmental Quality Act (CEQA) typically requires a background

concentration to be added to the maximum concentration increment predicted by the model ⁷ and compared to the SCAQMD designated threshold concentration, which is equal to the ambient air quality standard. For these pollutants, the 2007 maximum ambient air concentration for the entire South Coast Air Basin (SCAB) was used for background concentrations in this screening-level analysis. PM10 and PM2.5 emissions are not added to the background because the background already exceeds the NAAQS. It is not feasible to prohibit all projects that result in any PM10 or PM2.5 emissions. Accordingly, Regulation XIII significance thresholds are used for both PM10 and PM 2.5.

PM10 concentrations were compared to the SCAQMD incremental 24-hour significance threshold of 2.5 µg/m³ and annual standard of 1 µg/m³; no background concentration was used in evaluating PM. For NO₂, the maximum annual background NO₂ concentration reported in the District exceeded the total ambient air quality standard. As a result, screening-level concentrations were compared to the incremental 1-hour significance threshold of 20 µg/m³ and annual significant threshold of 1 µg/m³. Table 5 lists the background concentrations used in the screening-level analysis.

Table 5. Background Concentrations Added to SCREEN3 Output Concentrations

Pollutant	Averaging Time	2007 SCAQMD Maximum Ambient Concentration (µg/m ³) ^a	SCAQMD Ambient Concentration Threshold (µg/m ³) ^b
PM10 ^c	24-hour	N/A	2.5
	Annual	N/A	1.0
NO ₂ ^d	1-hour	N/A	20
	Annual	N/A	1.0
SO _x	1-hour	290	655
	24-hour	28.8	105
CO	1-hour	9,200	23,000
	8-hour	5,865	10,000

N/A: Not applicable (the maximum background concentrations for PM10 and NO₂ were higher than the maximum ambient threshold; therefore, only incremental concentrations of these pollutants were evaluated in the screening analysis).

- a) 2007 Air Quality, South Coast Air Quality Management District. <http://www.aqmd.gov/smog/AQSCR2007/aq07card.pdf>.
- b) The SO₂, and CO thresholds are absolute thresholds; the maximum predicted impact from permitted emissions is added to the background concentration for the project and compared to the threshold.
- c) The particulates (PM10 and PM2.5) threshold is an incremental threshold.
- d) Because 2007 annual background concentration (59.8 µg/m³) was higher than the ambient threshold (56 µg/m³), an incremental value of 20 µg/m³ for 1-hour and 1 µg/m³ for annual was used instead.

⁷ Incremental concentrations were scaled for facility operating schedules, as described in Section 4.2.4, and for averaging time, as described in Section 4.2.6.

4.2.6 Adjustment of Concentration Averaging Time

Results from SCREEN3 are reported as maximum one-hour ambient concentrations. To obtain exposure estimates for longer averaging periods, the outputs from SCREEN3 were adjusted using scaling factors derived by USEPA. The scaling factors applied are listed in Table 6 for each averaging time of interest.

Table 6. Averaging Time Scaling Factor for Adjustment of SCREEN3 Output Concentrations

Averaging Time	Scaling Factor ^a
1-hour	1.00
8-hour	0.70
24-hour	0.40
Annual	0.08

a) USEPA. Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised. 1992. EPA-454/R-92-019, pg 15.

4.3 Screening Model Outputs and Prioritization of Permits

As discussed above, for criteria pollutants, SCREEN3 outputs used in the screening analysis were the estimated maximum offsite ambient concentration increments for the specified averaging time. These results were compared to ambient thresholds, taking into account background, as appropriate, to obtain a screening-level measure of impact (i.e., “exceeds threshold” or “does not exceed threshold”). The total number of permits exceeding the ambient air concentration thresholds for each pollutant is presented in Table 7. The number of permits within each permit category that exceeded the SCAQMD threshold of significance for each pollutant is presented in Appendix C2 of this report. The number of permits exceeding the SCAQMD operational emission rate thresholds for each category is presented in Table 8, and a complete list of emissions rate thresholds exceedances by permit category are presented in Table C2-6 of Appendix C2 of this report.

Table 7. Results of the Screening Analysis: Permits Exceeding the Pollutant-Specific SCAQMD Ambient Air Quality Thresholds of Significance

Pollutant	Total Permits	Number of Permits Exceeding SCAQMD Ambient Air Quality Thresholds			
		Short-term without background	Short-term with background	Long-term without background	Long-term with background
CO	2843	13	21	3	12
SO _x	368	21	39	25	28
NO _x	4247	2,512	N/A	1,581	N/A
PM10	3917	2,689	N/A	2,345	N/A

N/A = Not Applicable. NO_x and PM10 ambient air concentration in the South Coast Air Basin are higher than the District ambient concentration threshold; therefore incremental thresholds provided in Section 2.3.1 were used.

Table 8. Number of Permits Exceeding SCAQMD Operation Emission Rate Thresholds

Pollutant	Number of Permits Exceeding the Threshold	SCAQMD Operational Emission Rate Threshold (pounds per day)
Carbon monoxide (CO)	23	550
Nitrogen oxide (NO _x)	112	55
Particulate matter (PM10)	22	150
Particulate matter (PM2.5)	67	55
Sulfur oxide (SO _x)	6	150
Volatile Organic Carbon (VOC)	98	55

Compared to PM and NO_x, relatively few permitted emissions of CO and SO_x exceeded the thresholds of significance. Given the conservative assumptions used in the screening-level model, it was assumed that emissions of CO and SO_x in the permit database would be unlikely to cause adverse impacts, at least in comparison to the impacts resulting from other pollutant emissions. Therefore, CO and SO_x were not included in the refined analysis.

For each remaining pollutant, the ten permit categories with the highest number of permits exceeding the threshold were selected for refined analysis. Several permit categories appear in the top ten lists for more than one pollutant. This approach covered the majority of exceedances estimated using the screening approach, as indicated by the following summary statistics.

- The total number of unique combinations of permit ID, pollutant and averaging period was 48,739, counting only those combinations for which emissions were reported.
- Of this total, the number of unique combinations (permit ID + pollutant + averaging period) that exceeded the District's significance criteria based on the screening results was 20,745, or about 43%.

- Of the number of unique combinations (permit ID + pollutant + averaging period) that exceeded the District’s significance criteria, the number of unique combinations that were associated with permit categories evaluated in the refined analysis was 18,375, or about 89% (of the 43%).

Table 9 lists all the permit categories included in the refined assessment.

Table 9. Permit Categories for Refined Analysis

Permit Category	Justification for Including in Refined Analysis (Criteria Pollutant)
Spray Booth and Equipment	PM, NO _x
Tanks and Storage	PM
Blasting	PM
Blending	PM
Heater/Furnace	PM, NO _x
Equipment Process	PM, NO _x
Tar Pot	PM, NO _x
Afterburner	PM, NO _x
Asphalt	PM, NO _x
Turbine Engine > 50 MW	PM
Internal Combustion Engine	NO _x
Soil Treat Vapor Extract	NO _x
Oven	NO _x
Printing	NO _x

MW = Megawatt, PM = Particulate matter, NO_x = Nitrogen oxide

5 Refined Analysis (AERMOD)

5.1 Approach and Selection of Model

The air dispersion modeling for the refined analysis of air quality impacts from air pollutants was performed using the U.S. Environmental Protection Agency’s AERMOD Modeling System (2004), version 010709, based on the Guideline on Air Quality Models (40 Code of Federal Regulations [CFR], Part 51, Appendix W, November 2005). Criteria pollutants, including NO_x, and PM10 were modeled for the project operational emissions. The predicted ground-level concentrations were compared to relevant SCAQMD air quality significance thresholds to determine the air quality impacts of the proposed project.

The AERMOD model is a steady-state, multiple-source, Gaussian dispersion model. The AERMOD model uses hourly surface meteorological data, including wind direction, wind speed, and temperature, as well as cloud cover and upper-air meteorological temperature data. The selection of the AERMOD model is well-suited for this component of the PEA local air quality analysis based on (1) the general acceptance by the modeling community and regulatory agencies of its ability to provide reasonable results for large industrial complexes with multiple emission sources, (2) the availability

of an annual set of hourly meteorological data for use by AERMOD, and (3) the ability of the model to handle the various physical characteristics of emission sources, including “point,” “area,” and “volume” source types. AERMOD is a USEPA-approved dispersion model, and SCAQMD recommends its use in their permitting process.

5.2 Model Inputs and Options

5.2.1 Emission Inputs

For each permit category evaluated in the refined analysis, emission rates for a given pollutant type (i.e., NO₂, PM₁₀, or TACs) were selected from the permits in the category to represent both a typical and a reasonable maximum expected emission rate. These emission rates were assumed to be represented by the emission rate of the permits at the 50th and 95th percentile of the distribution of emission rates, respectively, within each permit category (and evaluating pollutant types separately) to demonstrate typical and reasonably foreseeable worst-case emission scenarios.

Emission rates provided by the District were 30 calendar-day average daily emissions in pounds per day. AERMOD requires emission units of grams per second, as well as a temporal profile indicating any hour-by-hour variations in emission rate over the modeling period (temporal emission profiles are discussed in Section 5.2.3).

The 30-day average daily emission rate provided by the District is calculated under the assumption that the facility is operating 7 days a week. Therefore, the emission rates were adjusted to take into account the actual number of operating days per week of the representative facilities, as indicated by the permit. In addition, when converting emission rates from pounds per day to grams per second, rates were adjusted to reflect the rates that would occur during operating hours as indicated by the permit. That is, like the short-term emission rate in the screening analysis (Section 4.2.4), the AERMOD emission rate for operating hours on operating days was scaled using a factor calculated from the following equation:

$$AV30 \text{ Emissions Rate} * (7/\text{No. of operating days per week}) * (24/\text{No. of operating hours per day})$$

5.2.2 Temporal Profiles

AERMOD can accommodate temporal variation in the emission rate over time, including periods when no emissions occur. For this analysis, permitted emissions were assumed to occur according to the operating schedule included in the permit data set provided by SCAQMD (Section 5.2.1). During hours when emissions occur, the emission rate was assumed to be constant. For permits for which operations and emissions do not occur continuously (i.e., less than 24 hrs/day, 7 days/week, 52 weeks/yr), some assumptions were made regarding time of day when emissions occur. For example, emissions were generally assumed to preferentially occur during weekdays, daylight hours and, for emissions occurring less than 52 weeks per year, at the beginning of the year. Emission factors were developed to turn the emission “on” or “off” based on this approach. For example, if the facility operates 52 weeks per year, 5 days per week, 8 hours per day, the emissions were “on” Monday through Friday from 9am-5pm. Table C4-2 of Appendix C4 of this report lists the various operating schedule used in the refined assessment.

5.2.3 Source Parameters

Other important required inputs for AERMOD include stack parameters of the release point, including release height, exit gas temperature, stack (or release point) diameter, exit gas velocity, and exit gas flow rate (note that diameter, exit velocity, and flow rate are correlated). For this analysis, in the absence of other information, it was assumed that all emissions from a given permit are released from a single release point.

The SCCs assigned to the permits for the purposes of the screening analysis were used as a starting point to identify appropriate stack parameters for the refined modeling analysis. However, some additional processing was conducted to ensure that the stack parameter values associated with the permits (i.e., those selected to represent 50th and 95th percentile emission rates) were also representative of “typical” and “high end” conditions, and also were logical and consistent parameter values to use for the emission rates.

The permits selected to represent the median and 95th percentile emission rates were reviewed to ensure the SCCs assigned to each were representative of other “nearby” permits included in that permit category (i.e., the other emission-ranked permits corresponding to percentiles similar to the 50th and 95th percentile emission rate). For example, in cases where the majority (i.e., 90%) of the top 10% of permits by emissions were characterized by a single SCC, but the permit selected to represent the 95th percentile emission rate was characterized by a different SCC, the SCC code for that permit was changed to match the SCC representing the majority of permits in the permit category.

This SCC was then used to define the stack parameters for each permit category/emission percentile combination using USEPA’s 2002 NEI database of point source emissions as a primary data source for parameter values.⁸ First, the full set of release points in NEI associated with that SCC was obtained. These were investigated to determine the origin of the stack parameter value, as original values (usually reported by the facility), SCC default values, or generic national default values developed by EPA. Any NEI records with national default values were removed from this analysis (these records do not take into account the process emitting the pollutant). If the NEI records for a given SCC included 10 or more records with original stack parameters, these records were used in a SCREEN3 simulation to determine the set of parameters that resulted in median (50th percentile) and high (95th percentile) output concentrations for a given emission rate (see Appendix C4 of this report for the complete list of permits selected for the 50th and 95th percentile emissions). This median set of stack parameters was then used for the AERMOD simulations. If less than 10 original sets of stack parameters were available, the SCC default values for stack parameters developed by USEPA for NEI were used.

In most cases the median or default set of stack parameters were used for both the 50th and 95th percentile emissions. For certain permit categories, however, it was not realistic for a source with a high emission rate (represented by the 95th percentile) to have the same set of stack parameters as one releasing typical emissions (50th percentile) because a higher emission rate may be associated with (and require) a higher volumetric flow rate. In such cases, a higher stack height, higher exit velocity, and larger stack diameter were used in the refined modeling of the 95th percentile emissions.

⁸ Stack parameters obtained from NEI were selected in “sets” (i.e., all four stack parameters from a single record were pulled and remained together) rather than independently, so that the combinations of stack parameters used in the simulations would be realistic for the given SCC.

The median and SCC default sets of stack parameters were also scrutinized to ensure that they were appropriate. In a case where an abnormal or unexpected value occurred, additional research was conducted to find a more appropriate set of stack parameters. For example, the SCC default exit temperature of a tar pot was at room temperature. A more accurate exit temperature for tar pots was identified from the literature as 523 K (Rogge 1997). Table 10 lists the modifications made to the stack parameters for refined modeling.

Table 3. Modifications to Stack Parameters for Refined Analysis

Permit Category	Emissions Percentile	Modification	Reason
Asphalt	50 th	Temperature changed to 523K	More appropriate exit temperature ^a
Blasting	50 th	Representative SCC changed to 30900299	More reasonable for median emissions
Blending	95 th	Representative SCC changed to 30509202	More reasonable for 95 th percentile emissions
Heater/Furnace	95 th	Representative SCC changed to 30501414	More reasonable for 95 th percentile emissions
ICE	Both	Representative SCC changed to 20100101	SCC default more reasonable for source type
Spray Booth and Equipment	50 th	Representative SCC changed to 30906099	More reasonable for median emissions
Tar Pot	Both	Temperature changed to 523K	More appropriate exit temperature ^a

a) Source: Rogge, Wolfgang, Lynn Hildemann, Monica Mazurek and Glen Cass. Source of Fine Organic Aerosol. 7. Hot Asphalt Roofing and Tar Pot Fumes. Environmental Science and Technology. Vol. 31. 1997. p. 2726-2730..

5.2.4 Meteorological Data

The geographic and topographic features of the SCAB cause a significant variation in meteorological conditions between various parts of the Basin, which in turn lead to varying levels of air quality impacts from permitted facilities depending on the location of the facilities. Because of the time and resource requirements associated with AERMOD modeling and the results processing to determine ambient air quality impacts in the refined modeling, it was not feasible to evaluate the entire range of possible variations of meteorological conditions that occur in the SCAB. In order to ensure that this analysis evaluated locations with meteorology conducive to higher exposures and impacts while also accounting for some variation, three meteorological zones with conditions resulting in higher ground-level ambient concentrations were identified, and measurements from representative meteorological stations within those zones were used as inputs to AERMOD.

Surface wind speed and atmospheric stability are dominant factors in determining the dispersion characteristics of emitted pollutants. A statistical analysis of these parameters was conducted to define the boundaries of seven meteorological zones with similar dispersion characteristics. This analysis was conducted using the gridded meteorological conditions extracted from the fifth-generation NCAR/Penn State Mesoscale Model (MM5) outputs provided by the District. The parts of the SCAB encompassing the

following seven SCAQMD General Forecast Areas were included in this analysis: (1) Coastal; (2) Metropolitan; (3) San Fernando Valley; (4) San Gabriel Valley; (5) Inland Orange; (6) Riverside Valley; and (7) San Bernardino Valley. These seven forecast areas (out of a total of 14 Areas) are the regions in the Basin where the vast majority of the population in the District resides and most of the permits will be issued.

Although use of the MM5 outputs was determined to be the best approach to the statistical analyses regarding delineation of the meteorological zones, observational data collected at locations within the District was used in the AERMOD simulations for the refined analysis. To facilitate the SCAQMD's air permitting process, AERMOD-ready meteorological data sets were recently developed for the District for 25 monitoring locations in the SCAB three complete years (2005 – 2007). These AERMOD-ready observational data sets were used to conduct the refined air dispersion modeling because these data cover a three-year period and therefore were assumed to better represent long-term meteorological conditions. In addition, the District is planning to use this observational data set for future permitting assessments.

After defining the boundaries for seven meteorological zones using the MM5 data, dispersion modeling using the AERMOD-ready data and two sets of stack parameters was conducted to determine the three zones that are, on the whole, most conducive to higher ground-level ambient concentrations and representative locations within those zones. The following three meteorological stations were identified as representative locations for conducting the refined air dispersion modeling of selected permitted facilities.

- La Habra (LAHB) in Orange County,
- Azusa (AZUS) in Los Angeles County, and
- Burbank (BURK) in Los Angeles County.

The statistical analyses and model runs conducted to select these three stations are described in detail in Appendix C3 of this report.

5.2.5 Receptor Locations

Receptor locations (i.e., locations where individuals could potentially be exposed to ambient concentrations resulting from emitted pollutants) were arrayed in a polar grid at 10 degree intervals, with radials extending out to 5 km and spacing between radials varying from 10 to 400 m, with the finer resolution close to the source. Receptors began at the fenceline of the facility, which was assumed to be 50 m for all permit categories in the refined analysis, consistent with SCAQMD guidance (SCAQMD, 2005). In addition, a flat terrain was assumed since the representative facilities were not associated with a particular location in the basin.

5.2.6 Model Options

Model simulations for pollutants other than NO_x were conducted using a unit emission rate. Pollutant-specific concentrations were then obtained by scaling the resulting concentration outputs by permitted or estimated emission rates during a post-processing

step. All emissions sources were modeled with the urban source option because most of the SCAB region is considered an urban area.

The production of NO₂ depends on non-linear atmospheric production and decay processes whose rates are influenced by the ambient ozone concentrations. For these model runs, the chemistry of NO to NO₂ conversion was incorporated using the PVMRM option in AERMOD, with actual estimated emission rates of NO and NO₂ used in these simulations. The required hourly ozone concentrations were input from the District's air quality monitoring network for the year 2005. Because the permit data contained total NO_x emissions, a default NO₂/NO_x emission ratio of 0.1 was assumed.

5.3 Refined Modeling Outputs

Maximum 1-hour, 24-hour, and annual concentrations were obtained for each dispersion modeling run. Because each representative source was modeled with three sets of meteorological data individually (one for each of the three years of data), a set of nine concentration grids was generated for each modeled source and pollutant (with an additional dimension of results obtained for the two emission percentiles evaluated). For each pollutant and temporal averaging period, the maximum concentration from these nine sets of concentrations was compared with the District's ambient threshold for criteria pollutants (as described in greater detail in Section 6). The maximum annual concentrations for each dispersion modeling simulation are presented in Appendix C4 of this report.

5.4 Background Concentrations

As explained previously in Section 4.2.5, for all criteria pollutants except PM₁₀, the SCAQMD's CEQA thresholds typically require a background concentration to be added to the maximum concentration increment predicted by the model and compared to the SCAQMD designated threshold concentration (i.e., the ambient air quality standard). For the screening-level analysis, the 2007 maximum ambient air concentrations across the entire SCAB were used for background concentrations for non-PM₁₀ criteria pollutants. In the refined analysis, CO and SO₂ were not evaluated and therefore no background concentrations of these pollutants were required, and NO₂ was the only criteria pollutant for which background was included.

Several approaches were considered for estimating appropriate NO₂ background concentrations. Because background concentrations vary across the SCAB and are expected to change in future years as emissions change, NO₂ background concentrations were estimated based on dispersion modeling being conducted by SCAQMD as part of the parallel cumulative air quality analysis. These predictions provide finer spatial and temporal resolution of concentration estimates than do monitoring data, and in particular can project the effect of future emissions changes on air quality. Thus, for the base year and each future year, a background NO₂ concentration was selected for each of the three meteorological zones represented in this analysis and for each averaging time (maximum 1-hour average, annual average) as follows.

- The average monitor-to-model concentration ratio for monitors in the zone for the base year was calculated.

- The highest grid cell model prediction in the zone for base year or future year was selected and the base-year average monitor-to-model ratio was applied.

By adjusting the cumulative model predictions by the monitor-to-model ratios, the uncertainty associated with using model predictions was reduced.

6 Impact Determination

6.1 Approach and Methods

Air quality impact estimates for the representative facilities were evaluated on a chemical-specific basis as follows.

- PM10 and PM2.5: Highest estimated incremental operational project contribution concentrations were compared to the SCAQMD localized significance threshold (LST) of 2.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) for 24-hour impacts and 1.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) for annual average impacts.
- NO₂: Highest incremental ambient concentration predictions for the appropriate time-averaging periods were added to ambient background concentrations (based on SCAQMD model results) and compared to the 1-hour and annual average significance thresholds of 338 $\mu\text{g}/\text{m}^3$ and 56 $\mu\text{g}/\text{m}^3$. In cases where either the estimated background NO₂ concentrations exceeded the California ambient air quality standard or the combined model prediction and estimated background concentration exceeded the standard, the modeled incremental ambient concentration predictions were compared to the NO₂ incremental thresholds of 20 $\mu\text{g}/\text{m}^3$ (1-hour average) and 1 $\mu\text{g}/\text{m}^3$ (annual average).
- Operational Emissions: To supplement the aforementioned assessments of PM and NO₂, permitted criteria pollutant mass emissions were compared to applicable SCAQMD pollutant-specific daily significance thresholds for operational emissions.

6.2 Predicted Impacts

This section presents predicted impacts estimated from the refined modeling results. For each pollutant included in the refined analysis, impacts are presented in tabular fashion. Air quality results for criteria pollutants presented in this section include estimated concentrations for both the 50th and 95th percentile emission estimates at both short- and long-term exposure periods. These concentrations were compared to the appropriate threshold concentrations, and any exceedances are noted. In all cases (all pollutants), the results in this section are presented for each of the three meteorological station locations evaluated (i.e., Azusa, and Burbank, and La Habra), but only the highest result from the three modeled years is presented here (recall that three years of meteorological data were modeled, with each year modeled individually). Additional results, including results from all three modeled years, are presented in various tables appended to this report.

In general, the estimated impacts were relatively low for the representative permits assessed, with most estimates below levels of significance. In many cases, permitted emissions for which the estimated air quality impacts exceeded thresholds of significance (i.e., “exceedances” as indicated in the tables that follow) were of the magnitude that the threshold was not exceeded by a large amount, and likely within the margin of error considering the uncertainties and variability associated with this analysis. See Table 11 for a summary of threshold exceedances by pollutant.

Table 4. Summary of Refined Analysis: Number of Permits Exceeding the Thresholds of Significance

Criteria Pollutant	Time Scale	Number of Categories with at Least One Exceedance		Permit Categories with Significant Impacts
		50 th % ^{ile} Emissions	95 th % ^{ile} Emissions	
Criteria Pollutants				
NO _x	1-hour	0	0	Any exceedances are due to background concentrations
	Annual	0	0	Any exceedances are due to background concentrations
PM	24-hour	3	6	Spray booth and equipment; tar pot; blasting; equipment process; turbine engine > 50 MW; asphalt
	Annual	1	2	Spray booth and equipment; equipment process; asphalt

NO_x = Nitrogen oxide, PM = Particulate matter, MW = Megawatt

6.2.1 Air Quality Impacts

Assessment of operational emissions for the permit categories included in the refined assessment resulted in some estimated offsite ambient air pollutant concentrations exceeding the SCAQMD threshold of significance. Summaries of the maximum ambient concentrations for each permit category for each of the three representative worst-case locations in the SCAQMD and by pollutant for PM and NO₂ are displayed in Tables 12 through 16, with threshold exceedances noted in bold.⁹ The concentrations shown are the maximum values at each site that occurred over the three-year period of 2005 to 2007. See Appendix C3 of this report for the concentrations at each meteorological station for all three years modeled.

Particulate Matter

For PM_{2.5}, three categories resulted in potential impacts at the 50th percentile emissions: Tar Pots, Blasting (abrasive), and Equipment Processing (typically cement processing). Exceedances were estimated for all three permit categories for the maximum 24-hour time period; the annual threshold was also exceeded for equipment processing. Of these

⁹ Few exceedances were observed in the screening analysis for CO and SO₂. It was assumed that these few permits would pass using more refined modeling methods.

permit categories, only emissions modeled for the Tar Pot category resulted in ambient concentrations exceeding the threshold value by a substantial amount, with exceedances observed for all three meteorological stations modeled. Tar Pot emissions include emissions both from molten asphalt inside the kettle and from the combustion of liquefied petroleum gas (used to heat the asphalt).

At the 95th percentile emission rate, three additional permit categories were modeled as exceeding thresholds of significance, including Spray Booths, Turbine Engines > 50 megawatts (MW), and Asphalt. Tar Pots again was estimated to exceed the threshold by the largest interval, with exceedances again only estimated for the 24-hour averaging period (it was assumed that tar pots would not remain in one location for a long duration; thus, the annually-averaged exposures are relatively low). The Blasting permit category also showed potential for exceedance of the 24-hour threshold level. Sources covered by Tar Pots and Blasting permits were assumed to operate for fewer weeks per year and days per week than most other categories, which results in this increase in modeled 24-hour concentrations.

Table 5. PM2.5 Maximum Concentration over 3 years (2005-2007) with 50th Percentile Emissions

Permit Category	Time Scale	Estimated Proposed Project Concentration ($\mu\text{g}/\text{m}^3$)			Threshold ($\mu\text{g}/\text{m}^3$)
		Azusa	Burbank	La Habra	
Spray Booth and Equipment	24-hour	1.2	1.4	1.7	2.5
	Annual	0.46	0.33	0.47	1
Heater/Furnace	24-hour	0.59	0.58	0.39	2.5
	Annual	0.13	0.13	0.13	1
Tar Pot	24-hour	9.2	8.8	12.5	2.5
	Annual	0.07	0.06	0.07	1
Tanks and Storage ^{a, b}	24-hour	2.3	2.5	2.5	2.5
	Annual	0.75	0.74	0.82	1
Blasting	24-hour	3.6	3.7	4.3	2.5
	Annual	0.03	0.02	0.02	1
Equipment Process ^{a, c}	24-hour	3.2	3.0	3.7	2.5
	Annual	1.3	1.0	1.3	1
Blending ^a	24-hour	0.47	0.43	0.78	2.5
	Annual	0.17	0.15	0.26	1
Turbine Engine > 50 MW	24-hour	1.1	1.0	0.9	2.5
	Annual	0.22	0.13	0.20	1
Afterburner	24-hour	0.14	0.12	0.07	2.5
	Annual	0.03	0.02	0.02	1
Asphalt	24-hour	1.1	1.0	1.1	2.5
	Annual	0.27	0.22	0.24	1

MW = Megawatt

^a = Incremental impacts for 50th percentile emissions may be higher than 95th percentile emissions in cases where the stack parameters for 95th percentile emission were higher than the 50th percentile stack parameters. ICF used both average NEI stack parameters and a review of their representativeness for both the 50th and 95th percentile to select stack parameters that were appropriate for both the facility type and emission intensity. The

assignments for stack parameters were reviewed and evaluated for appropriateness as discussed in section 5.2.3. Appendix C4, Table C4-9, provides the stack parameters used for each permit in the refined modeling.

b- Tar pots and sandblasting equipment assumed to be portable equipment is exempt from modeling under Regulation XIII and could create significant impacts.

c – It should be noted that permits in this category are subject to air quality modeling under Regulation XIII and will not receive permits if they are projected to exceed Regulation XIII significance thresholds , which are the same as CEQA thresholds.

Table 6. PM2.5 Maximum Concentration over 3 years (2005-2007) with 95th Percentile Emissions

Permit Category	Time Scale	Estimated Proposed Project Concentration (µg/m ³)			Threshold (µg/m ³)
		Azusa	Burbank	La Habra	
Spray Booth and Equipment	24-hour	3.6	3.5	3.6	2.5
	Annual	0.94	1.2	0.76	1
Heater/Furnace	24-hour	1.06	0.92	0.61	2.5
	Annual	0.19	0.25	0.15	1
Tar Pot ^b	24-hour	112.4	110.1	215.9	2.5
	Annual	0.29	0.35	0.22	1
Tanks and Storage ^{a, c}	24-hour	1.7	1.7	1.8	2.5
	Annual	0.48	0.56	0.37	1
Blasting ^b	24-hour	47.9	56.8	52.2	2.5
	Annual	0.09	0.10	0.11	1
Equipment Process ^{a, c}	24-hour	2.8	2.6	1.6	2.5
	Annual	0.54	0.70	0.47	1
Blending ^a	24-hour	0.23	0.22	0.23	2.5
	Annual	0.08	0.10	0.06	1
Turbine Engine > 50 MW ^b	24-hour	3.8	2.9	2.3	2.5
	Annual	0.73	0.91	0.53	1
Afterburner	24-hour	1.1	1.0	0.56	2.5
	Annual	0.18	0.23	0.15	1
Asphalt	24-hour	4.6	4.5	4.0	2.5
	Annual	1.0	1.3	0.84	1

MW = Megawatt

^a = Incremental impacts for 50th percentile emissions may be higher than 95th percentile emissions in cases where the stack parameters for 95th percentile emission were higher than the 50th percentile stack parameters. ICF used both average NEI stack parameters and a review of their representativeness for both the 50th and 95th percentile to select stack parameters that were appropriate for both the facility type and emission intensity. The assignments for stack parameters were reviewed and evaluated for appropriateness as discussed in section 5.2.3. Appendix C4, Table C4-9, provides the stack parameters used for each permit in the refined modeling.

b- Tar pots and sandblasting equipment assumed to be portable equipment is exempt from modeling under Regulation XIII and could create significant impacts.

c – It should be noted that permits in this category are subject to air quality modeling under

Regulation XIII and will not receive permits if they are projected to exceed Regulation XIII significance thresholds, which are the same as CEQA thresholds.

NO₂

Background concentrations were added to the incremental NO₂ concentrations obtained from AERMOD modeling. Table 14 presents the background values added to the maximum incremental concentrations at each meteorological station in 2005, 2010, and 2030. The background concentrations exceed the SCAQMD ambient air threshold at the Burbank and Azusa locations in 2005 and at the Azusa location in 2030. The gridded background concentrations of NO₂ were provided by SCAQMD to ICF. SCAQMD modeled future NO₂ concentrations to conduct a parallel cumulative analysis.

As per the 2007 Air Quality Management Plan, adopted by the district to demonstrate the attainment of ozone eight-hour NAAQS, several regulations and technological advances are expected to significantly decrease basin-wide NO emissions in the future. Since NO₂ is produced in the atmosphere from the oxidation of NO, a decrease in future NO emissions generally decreases future NO₂ concentrations. However, some individual locations may deviate from this trend because the local or upstream growth in emissions may outpace emission reductions. Consequently, future NO₂ concentrations at most locations in the basin show a decrease. Burbank deviates from this trend for the annual NO₂ concentration.

Tables 15 and 16 show the maximum incremental concentration across the years 2005 and 2007 at each meteorological station for NO₂ estimated by the AERMOD modeling. In all cases where the background concentrations are below the state standard, the total NO₂ concentration (i.e., incremental plus background) are also below the SCAQMD ambient standard.

Table 14. NO_x Background Concentrations

Year	Time-Scale	Estimated Background Concentration (µg/m ³)			Threshold (µg/m ³)
		Azusa	Burbank	La Habra	
2005	1-hour	223.1	187.9	204.2	338
	Annual	57.5	58.3	42.4	56
2010	1-hour	205.1	175.8	188.7	338
	Annual	48.9	49.9	34.6	56
2030	1-hour	146.2	137.0	188.0	338
	Annual	25.4	65.9	23.3	56

Table 7. NO₂ Maximum Concentration over 3 years (2005-2007) with 50th Percentile Emissions

Permit Category	Time Scale	Estimated Proposed Project Concentration (µg/m ³)		
		Azusa	Burbank	La Habra
Spray Booth and Equipment ^a	1-hour	6.7	5.7	5.9
	Annual	0.13	0.09	0.13
Heater/Furnace	1-hour	3.5	3.6	3.1
	Annual	0.17	0.10	0.13
Tar Pot	1-hour	18.3	9.8	11.1
	Annual	0.01	0.01	0.01
Equipment Process ^a	1-hour	97.9	72.6	76.4
	Annual	2.5	1.6	2.2
Afterburner	1-hour	1.2	1.2	1.1
	Annual	0.08	0.04	0.07
Asphalt	1-hour	13.8	13.9	15.2
	Annual	0.52	0.30	0.46
Internal Combustion Engine	1-hour	0.02	0.02	0.02
	Annual	0.002	0.001	0.002
Soil Treat Vapor Extract	1-hour	11.9	28.0	45.9
	Annual	0.96	0.84	0.89
Oven	1-hour	7.0	6.2	5.8
	Annual	0.17	0.12	0.15
Printing ^a	1-hour	14.9	14.7	12.7
	Annual	0.36	0.25	0.31

MW = Megawatt

^a = Incremental impacts for 50th percentile emissions may be higher than 95th percentile emissions in cases where the stack parameters for 95th percentile emission were higher than the 50th percentile stack parameters. ICF used both average NEI stack parameters and a review of their representativeness for both the 50th and 95th percentile to select stack parameters that were appropriate for both the facility type and emission intensity. The assignments for stack parameters were reviewed and evaluated for appropriateness as discussed in section 5.2.3. Appendix C4, Table C4-9, provides the stack parameters used for each permit in the refined modeling.

Table 16. NO₂ Maximum Concentration over 3 years (2005-2007) with 95th Percentile Emissions

Permit Category	Time Scale	Estimated Ambient Concentration (µg/m ³)		
		Azusa	Burbank	La Habra
Spray Booth and Equipment ^a	1-hour	4.9	5.6	4.1
	Annual	0.20	0.12	0.16
Heater/Furnace	1-hour	4.6	4.8	4.4
	Annual	0.40	0.23	0.37
Tar Pot	1-hour	45.7	24.5	14.2
	Annual	0.02	0.02	0.02
Equipment Process ^a	1-hour	48.7	55.6	43.8
	Annual	2.6	1.4	1.9
Afterburner	1-hour	13.2	12.9	11.5
	Annual	0.85	0.47	0.78
Asphalt	1-hour	13.9	14.0	15.3
	Annual	0.92	0.51	0.80
Internal Combustion Engine	1-hour	0.22	0.21	0.19
	Annual	0.02	0.01	0.02
Soil Treat Vapor Extract	1-hour	23.8	56.1	91.7
	Annual	1.9	1.7	1.8
Oven	1-hour	30.2	29.8	27.8
	Annual	2.1	1.2	2.0
Printing ^a	1-hour	6.3	6.9	5.3
	Annual	0.34	0.19	0.25

MW = Megawatt

^a = Incremental impacts for 50th percentile emissions may be higher than 95th percentile emissions in cases where the stack parameters for 95th percentile emission were higher than the 50th percentile stack parameters. ICF used both average NEI stack parameters and a review of their representativeness for both the 50th and 95th percentile to select stack parameters that were appropriate for both the facility type and emission intensity. The assignments for stack parameters were reviewed and evaluated for appropriateness as discussed in section 5.2.3. Appendix C4, Table C4-9, provides the stack parameters used for each permit in the refined modeling.

As can be seen from the foregoing tables, none of the permits are expected to exceed one-hour or annual NO₂ standards at either the 50th and 95th percentile.

7 References

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Appendix C1: Permit Category Crosswalk

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Tables

Table C1-1. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis 1

Table C1-1. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Activated Carbon Adsorber	50410310		Activated Carbon Adsorber Drum Vent s.s.
			Activated Carbon Adsorber Other w/ Regen
			Activated Carbon Adsorber Drum Vent m.s.
			Activated Carbon Adsorber Drum Vent s.s.
			Activated Carbon Adsorber Drum Vent t.s.
			Activated Carbon Adsorber Other w/ Regen
Adhesives	30105001	ADHESIVES APPLICATION	
Adsorption	20100109	Adsorption Chillers (Gas Fired)>=5mmBTU	
		Adsorption Chillers (gas Fired)<5mmBTU/h	
Afterburner	40290013		Afterburner (<1 mmBTU/hr, venting m.s.)
			Afterburner (<1 mmBTU/hr, venting s.s.)
			AFTERBURNER, CATALYTIC
			AFTERBURNER, DIRECT FLAME
			AFTERBURNER - CATALYTIC FOR BAKERY OVEN
			Afterburner (<1 mmBTU/hr, venting m.s.)
			Afterburner (<1 mmBTU/hr, venting s.s.)
			AFTERBURNER, CATALYTIC
			Afterburner, Catalytic, </=1mmBTU/hr
			AFTERBURNER, DIRECT FLAME
			BOILER/HEATER/INCINERATOR AS AFTERBURNER
			INTERNAL COMBUSTION ENGINE AS AFTERBURNR
			AGOPS
AGOPS IC ENGINE (5-5 HP)			
30203099	AGOPS DAIRY		
	AgOps LACAF Dairy		
Air Filter	30101462		AIR FILTER CUSTOM

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Alkylation	30116902	ALKYLATION UNIT	
		ALKYLATION UNIT	
Amine	31000305		AMINE (OR DEA) REGENERATION
Asphalt	30203802	ASPHALT SIZE REDUCTION	
	30402201	ASPHALT TREATING	
	30500101	ASPHALT SATURATOR	
		ASPHALT SATURATOR	
	30500105	ASPHALT ROOFING LINE	
		ASPHALT ROOFING LINE	
	30500198	ASPHALT STRIPPING	
	30500212	ASPHALT PAVEMENT HEATER	
		DAY TANKER ASPHALTIC	
	30500298	ASPHALT BLENDING	
		ASPHALT BLENDING/BATCHING EQUIPMENT	
		ASPHALT BLENDING/BATCHING EQUIPMENT	
		Asphalt Prod/Recycle <5 tpd	
		Asphalt Prod/Recycle =>1 tpd	
Autoclave	30402201	AUTOCLAVE	
		AUTOCLAVE	
Baghouse	30400732		BAGHOUSE
			BAGHOUSE, AMBIENT TEMP (<=1 SQ FT)
			BAGHOUSE, AMBIENT TEMP (>1-5 SQ FT)
			BAGHOUSE, AMBIENT TEMP (>5 SQ FT)
			BAGHOUSE
			BAGHOUSE, AMBIENT TEMP (<=1 SQ FT)
			BAGHOUSE, AMBIENT TEMP (>1-5 SQ FT)
			BAGHOUSE, AMBIENT TEMP (>5 SQ FT)
			BAGHOUSE, HOT

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Biofilter	30106004		BIOFILTER
			BIOFILTER
			Biofilter (>1 cfm)
Blasting	30900201	ABRASIVE BLASTING (CABINET/MACHINE/ROOM)	BAGHOUSE, AMBIENT TEMP (<=1 SQ FT)
			BAGHOUSE, AMBIENT TEMP (>1-5 SQ FT)
		ABRASIVE BLASTING (OPEN)	BAGHOUSE, AMBIENT TEMP (>5 SQ FT)
			DUST COLLECTOR CARTRIDGE TYPE
Blending	30100907	ALCOHOLS BLENDING	
		COSMETICS BLENDING	
		DETERGENTS AND CLEAN COMPOUNDS BLENDING	
		MISC MATERIALS BLENDING	
		OTHER AGGREGATE BLENDING	
		OTHER AGGREGATE BLENDING	
		POLYURETHANE BLENDING	
		SOLVENTS MISC BLENDING	
	30101401	PAINTS BLENDING	
		PAINTS BLENDING	
		PIGMENTS BLENDING	
	30102054	INK MFG/BLENDING	
		INK MFG/BLENDING	
	30102614	ADHESIVES BLENDING	
		PLASTICS & RESINS BLENDING	
		POLYESTER BLENDING	
		RUBBER BLENDING	
		WAX BLENDING	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Blending, continued	30106099	PHARMACEUTICALS BLENDING	
	30200809	FEED AND FOOD MISC BLENDING	
		FOUNDRY SAND BLENDING	
		SILICA SAND BLENDING	
		STARCH BLENDING	
		STARCH BLENDING	
		SYNTHETIC FERTILIZER BLENDING	
	30202002	FEED AND FOOD MISC BLENDING	
	30500298	CEMENT BLENDING	
		CONCRETE BLENDING	
	30500309	AGGREGATE BLENDING	
		WAX BLENDING	
	30509202	GYPSUM BLENDING	
		LEAD OXIDE BLENDING	
		MINERALS MISC BLENDING	
		MISC INORGANIC CHEMICALS BLENDING	
		MISC ORGANIC MATERIAL BLENDING	
	30602201	ORGANIC CHEMICALS MISC BLENDING	
		PLASTICS & RESINS BLENDING	
		POLYETHYLENE BLENDING	
Boiler	10101003	BOILER (<=1 MMBTU/HR) LFG/DG & OTH OIL	
		BOILER (>2-5 MMBTU/HR) OTHER FUEL	
	10200602	BOILER (>2-5 MMBTU/HR) NAT GAS ONLY	
		BOILER (5-2 MMBTU/HR) NAT GAS ONLY	
Boiler	10200602	BOILER (<5 MMBTU/HR) NAT GAS ONLY	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Boiler < 10 MBTU	10200503	BOILER (< 2 mmBTU/HR) OIL FIRED	LOW NOX BURNER
	10300603	BOILER (<=1 MMBTU/HR) NAT & DGSTR GAS	
		BOILER (<5 MMBTU/HR) NAT GAS ONLY	
		BOILER (<5 MMBTU/HR) NG & MISC; RES RECV	
		BOILER (<5 MMBTU/HR) NG & PG; RES RECOVR	
		BOILER (<5 MMBTU/HR) NG ONLY; COGEN	
		BOILER (<5 MMBTU/HR) NG ONLY; PWR PLANT	
		BOILER (<5 MMBTU/HR) NG/PG-LPG; RES RECV	
		BOILER (<5 MMBTU/HR) NG-DISTILL; PWR PLT	
		BOILER (<5 MMBTU/HR) OTHER FUEL	
		BOILER (<5 MMBTU/HR) OTHER FUEL; RES REC	
		BOILER (<5 MMBTU/HR) PROCESS GAS; RES RE	
		BOILER (<5mmBTU/hr) Nat Gas	
		BOILER < 2MM BTU/HR OIL-FIRED DIESEL	
		BOILER/HOT WATER HEATER,VARIOUS LOCATION	
		BOILER/HOTWATER HEATER,SINGLE FACILITY,P	
		BOILER/HOTWATER HEATER,SINGLE FACILITY,PORTABLE,<6,BTU/HR,DIESEL/OIL FIRED	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Boiler > 50 MBTU	10100602	BOILER UTILITY (>5 MW)		
	10100702	BOILER (>5 MMBTU/HR) COMB GAS-DISTILL		
		BOILER (>5 MMBTU/HR) NAT GAS & MISC		
		BOILER (>5 MMBTU/HR) NAT GAS ONLY		
		BOILER (>5 MMBTU/HR) NAT GAS ONLY		
		BOILER (>5 MMBTU/HR) OTHER FUEL		
		BOILER (>5 MMBTU/HR) PROCESS GAS		
Boiler 10 - 50 MBTU	10300602	BOILER	LOW NOX BURNER	
		BOILER (>2-5 MMBTU/HR) COMB GAS-DISTIL		
		BOILER (>2-5 MMBTU/HR) COMB GAS-LPG		
		BOILER (>2-5 MMBTU/HR) COMB GAS-RESID		
		BOILER (>2-5 MMBTU/HR) NAT GAS ONLY		
		BOILER (>2-5 MMBTU/HR) NAT GAS ONLY		
		BOILER (>2-5 MMBTU/HR) NAT GAS ONLY PP		
		BOILER (>2-5 MMBTU/HR) NAT GAS-DIST PP		
		BOILER (5-2 MMBTU/HR) COMB GAS-DISTILL		
		BOILER (5-2 MMBTU/HR) COMB GAS-LPG		
		BOILER (5-2 MMBTU/HR) NAT & PROC GAS		
		BOILER (5-2 MMBTU/HR) NAT GAS & MISC		
		BOILER (5-2 MMBTU/HR) NAT GAS ONLY		FLUE GAS RECIRCULATION
				LOW NOX BURNER
		SELECTIVE CATALYTIC REDUCTION		
	BOILER (5-2 MMBTU/HR) NAT GAS ONLY			

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Boiler 10 -50 MBTU, continued	10300602	BOILER (5-2 MMBTU/HR) NAT GAS ONLY	VAPOR RECOVERY SERVING BULK LOADING
		BOILER (5-2 MMBTU/HR) NAT GAS ONLY C/G	
		BOILER (5-2 MMBTU/HR) NAT GAS ONLY P/P	
		BOILER (5-2 MMBTU/HR) NG/PG & LPG	
		BOILER (5-2 MMBTU/HR) OTHER FUEL	
	10300811	BOILER (>1 MMBTU/HR) LANDFILL GAS	
Bulk Load/Unload	30201408	Flour Bulk Unloading	
	30510498	Aggregate Bulk Unloading	
		Alcohols Bulk Unloading	
		BULK CHEMICAL TERMINAL ORGANIC CHEM MISC	
		BULK LDNG/UNLDG RACK,JP-8,(>5K-2K GPD	
		BULK LDNG/UNLDNG,RACK,JP-8,>2, GPD	
		BULK LOAD MULTI REC TRUCKS GASOLINE	
		BULK LOAD MULTI-RACK FACILITY CRUDE OIL	
		BULK LOAD MULTI-RACK FACILITY FUEL OIL	
		BULK LOAD MULTI-RACK FACILITY LT DISTILL	
		BULK LOAD TANK TRUCK (1 RACK) CRUDE OIL	
		BULK LOAD TANK TRUCK (1 RACK) CRUDE OIL	
		BULK LOAD TANK TRUCK (1 RACK) GASOLINE	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Bulk Load/Unload, continued	30510498	BULK LOAD TERMINAL REC PIPELINE GASOLINE	
		BULK LOAD TNK TRK (1 RACK) MISC ORG CHEM	
		BULK LOAD TNK TRK (1 RACK) MISC ORG CHEM	
		BULK LOAD/UNLOAD (>2, G/D) GASOLINE	
		BULK LOAD/UNLOAD (>2, G/D) GASOLINE	
		Bulk Load/Unload (>5,-2, gpd)	
		BULK LOAD/UNLOAD CEMENT	
		BULK LOAD/UNLOAD CEMENT	
		BULK LOAD/UNLOAD FLY ASH	
		BULK LOAD/UNLOAD HYDROCARBONS	
		Bulk Load/Unload Rack (>2, gpd)	
		Bulk Load/Unload Stn (<5, gpd)	
		Bulk Load/Unload Stn (<5, gpd)	
		BULK LOADING, LIQUID (<5, GPD) JET-A	
		BULK LOADING, LIQUID (>2, GPD)JET-A	
		BULK LOADING/UNLOADING FUEL DISPENSING (
		Cement Bulk Unloading	
		CEMENT MARINE LOADING & UNLOADING	
		MARINE BULK LDNG/UNLDN,PET MID DISTILL	
		MARINE BULK LDNG/UNLDNG SYS., CRUDE OIL	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Bulk Load/Unload, continued	30510498	Miscellaneous Bulk Unloading RAILROAD CAR UNLOAD GASOLINE	
		RAILROAD CAR UNLOAD HYDROCARBONS MISC	
		RAILROAD CAR UNLOADING CHEMS MISC ORGANI	
	30510502	CEMENT MARINE LOADING & UNLOADING	
	30510503	COAL BULK LOADING MARINE TERMINAL	
	30510598	Bulk Load/Unload (>5,-2, gpd)	
	40400250	BULK LOAD TANK TRUCK (1 RACK) CRUDE OIL	
		BULK LOAD TANK TRUCK (1 RACK) FUEL OIL	
		BULK LOAD, LIQ (5,-2,GPD) JET-A	
		BULK LOADING/UNLOADING FUEL DISPENSING (
MARINE BULK LDNG/UNLDNG SYS., CRUDE OIL			
Calcining	30515002	GYPSUM CLACINING	
		GYPSUM CLACINING	
Carbon Filer	30102422		CARBON FILTRATION SYSTEM OTHER
Carpet/Textiles Processing	33000101	TEXTILE PROCESSING SYSTEM	
		Textiles, Recycled, Processing	
	33000103	Textiles, Recycled, Processing	
	33000399	CARPET PROCESSING SYSTEM	
Catalyst	30509203	Charbroiler,NatGas - Integrated Catalyst	Afterburner, Catalytic, <=1 mmBTU/hr

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Catalytic Reduction	30301402		SELECTIVE CATALYTIC REDUCTION
			SELECTIVE CATALYTIC REDUCTION
	30601601		SELECTIVE CATALYTIC REDUCTION
			SELECTIVE CATALYTIC REDUCTION
Circuit Board Etchers	31303001	CIRCUIT BOARD ETCHER, OTHER	
		CIRCUIT BOARD ETCHERS, AMMONIA	
Classification	30502713	AGGREGATE SIZE CLASSIFICATION	
		GRAINS SIZE CLASSIFICATION	
		MISC MATERIALS SIZE CLASSIFICATION	
		MISC MINERALS SIZE CLASSIFICATION	BAGHOUSE, AMBIENT TEMP (>5 SQ FT)
Cleaning	30900302	CLEANING, MISCELLANEOUS SOLVENT WIPE	
		FILM CLEANING MACHINE	
		MISC MATERIALS CLEANING	
		MISC ORGANIC MATERIAL CLEANING	
Coating	30500301	COATING & DRYING EQUIP CONTINUOUS ORG, WEB TYPE	
		COATING LINE - CAN/COIL	
		COATING LINE - PAPER/FABRIC/FILM	
		DIP TANK (<=3 GAL/DAY) MISC	
		DIP TANK COATING DYE	
		DIP TANK COATING MISC	
		DIP TANK COATING MISC	
		DIP TANK COATING PAINT	
		DIP TANK COATING PLASTIC	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Coating, continued	30500301	PHARMACEUTICALS MFG.- TABLETING,COATING,V	
		PHARMACEUTICALS MFG.- TABLETING,COATING,VITA,HERBS	
		PHARMACEUTICALS MFG.- TABLETING,COATING,VITA,HERBS	
		RESIN/GEL COAT SPRAYING	
		ROLLERCOATER	
		TABLET COATING PAN	
Coffee Roasting	30200201	Coffee Roasting (5-9 lb capacity)	
		Coffee Roasting, (1-49 lb capacity)	
Cogeneration	20200104	COGENERATION FACILITY	NON SELECTIVE CATALYTIC REDUCTION
		COGENERATION SYSTEM	
		COGENERATION UNIT	
		MISCELLANEOUS COGENERATION	
Collection	50100406	Landfill Condensate/Leachate/Collection	
		LANDFILL GAS ABSORPTION	
		LANDFILL GAS COLLECTION (<1 WELLS)	
		LANDFILL GAS COLLECTION (>5 WELLS)	
Composting	30104501	LANDFILL GAS COLLECTION (1-5 WELLS)	Activated Carbon Adsorber Drum Vent t.s.
		Composting, in vessel	
		Composting, in vessel	
Condenser	49000202		REFRIGERATED CONDENSER
Control System	0		CONTROL SYSTEMS, FOUR OR MORE IN SERIES

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Conveying	30500905	AGGREGATE CONVEYING	
		CEMENT CONVEYING	
		CONCRETE CONVEYING	
		FEED AND FOOD MISC CONVEYING	
		FLOUR CONVEYING	
		FLY ASH CONVEYING	
		LIME/LIMESTONE CONVEYING	
		MISC INORGANIC CHEMICALS CONVEYING	
		MISC MINERALS CONVEYING	
		MISCELLANEOUS CONVEYING	
		OTHER AGGREGATE CONVEYING	
		PETROLEUM COKE CONVEYING	
		SAND CONVEYING	
		SYNTHETIC FERTILIZER CONVEYING	
Cooling Tower	385	COOLING TOWER OR POND	
Cracking	30112547	FLUID CATALYTIC CRACKING EQUIPMENT	
		FLUID CATALYTIC CRACKING UNIT	
		FLUID CATALYTIC CRACKING UNIT	
Crematory	31502102	CREMATORY	Afterburner (<1 mmBTU/hr, venting s.s.)
Cyclone	30700807		CYCLONE
			CYCLONE
Deep Fat Fry	30203602	CORN PRODUCTS, REACT-DEEP FAT FRY	
		DEEP FAT FRY OTHER FEED AND FOOD	
		DEEP FAT FRYER	
		DEEP FAT FRYER NUTS	
		DEEP-FAT FRYER VEGETABLE OILS	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Deep Fat Fry, continued	30203602	MEAT PRODUCTS, REACT-DEEP FAT FRY	
Degreaser	40100222	DEGREASER OTHER SOLVENT (>1 lb VOC/DAY)	
		DEGREASER OTHER SOLVENTS <=1 lb/d VOC	
Dehydration	30120553	NATURAL GAS DEHYDRATION	
		NATURAL GAS DEHYDRATION	
	31000227	DEHYDRATION SYSTEM	
Deposition	30500899	CERAMICS, DEPOSITION (>= 5 PIECES)	
Desalinzation	30502101	DESALTING OPERATIONS	
Distillation	30125104	HYDROCARBONS, NEC.DISTILLATION	
		PET MID DISTILLATE HYDROCRACKING	
Drop Forge	30300998	DROP FORGE	
		DROP FORGE	
Dry Cleaning	40100101	DRY CLEANING EQUIP PERCHLOROETHYLENE	VAPOR RECOVERY UNIT COMPRESS & CONDENSE
		DRY CLEANING EQUIP PETROLEUM SOLVENT	
		DRY CLEANING,DRY-TO-DRY NV,W/ SIC,PERC	
		Dry Cleaning—HC Glycol Ethers	
Dry Filter	30101462		DRY FILTER (>1-5 SQ FT)
			DRY FILTER (>5 SQ FT)
Drying	30500301	BLOOD DRYING	
		BORAX & BORON COMPOUNDS DRYING	
		CARBON BLACK DRYING	
	33000106	CHIP DRYER	
		DRYER	
		FABRIC, DRYING SYSTEM	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Drying, continued	33000106	FEED AND FOOD MISC DRYING	Activated Carbon Adsorber Drum Vent s.s.
		FEED AND FOOD MISC DRYING	
		MISC MATERIALS DRYING	
		MISC MINERALS DRYING	
		MISC ORGANIC MATERIAL DRYING	
		NATURAL GAS DRYING	
		NATURAL GAS DRYING	
		OTHER AGGREGATE DRYING	
		OTHER AGGREGATE DRYING	
		PAPER DRYING	
PHARMACEUTICALS DRYING			
Dust Collector	0		DUST COLLECTOR CARTRIDGE TYPE
			DUST COLLECTOR/HEPA, OTHER R-141 TOXICS
Electrostatic Precip.	40201438		ELECTROSTATIC PRECIP HI VOLT (\geq 3CFM)
			ELECTROSTATIC PRECIP HI VOLT (\geq 3CFM)
			ELECTROSTATIC PRECIP LO VOLT ($<$ 3 CFM)
Equipment Process	30101472	STERILIZING EQUIPMENT	
		UNSPECIFIED EQUIP/PROCESS (SCH A)	
		UNSPECIFIED EQUIP/PROCESS (SCH B)	
		UNSPECIFIED EQUIP/PROCESS (SCH E)	
	WASTE-TO-ENERGY EQUIPMENT		
	30200734	FILLING MACHINE, DRY POWDER	
30400505	BATTERY MANUFACTURING		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Equipment Process, continued	30400706	SAND HANDLING EQUIPMENT FOUNDRY		
	30400805	GALVANIZING EQUIPMENT		
		GALVANIZING EQUIPMENT		
	30501199	CONCRETE BATCH EQUIPMENT		
		UNSPECIFIED EQUIP/PROCESS (SCH C)		
		UNSPECIFIED EQUIP/PROCESS (SCH C)		
				Unspecified Equip/Process (Sch C)
				Unspecified Equip/Process (Sch D)
	30700804	CUT-OFF SAW		
	33000211	IMPREGNATING EQUIPMENT		
40201806	COATING & DRYING EQUIP CONTINUOUS ORG, W			
		AFTERBURNER, DIRECT FLAME		
		DUST COLLECTOR CARTRIDGE TYPE		
Evaporator	30700302	EVAPORATOR, TOXICS		
		FUEL OIL EVAPORATION		
		MISC MATERIALS EVAPORATION		
		MISC ORGANIC CHEMICALS EVAPORATION		REFRIGERATED CONDENSER
Extruder	30101809	FOAMS PLASTICS & RUBBER EXTRUDER		
		PLASTICS & RESINS EXTRUDER		
		PLASTICS & RESINS EXTRUSION SYSTEM		
		POLYSTYRENE EXTRUDER		
		POLYSTYRENE EXTRUDING/EXPANDING		
		POLYVINYL CHLORIDE EXTRUDER		
		POLYVINYL CHLORIDE EXTRUSION SYSTEM		
	30801002	CLAY EXTRUDER		
		EXTRUSION SYSTEM POLYSTYRENE		
		PHARACEUTICALS EXTRUDER		
		PLASTICS & RESINS EXTRUSION SYSTEM		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Flare	30190099		FLARE SYSTEM, REFINERY
			FLARE SYSTEM, REFINERY
	50100789		FLARE, ENCLOSED LANDFILL/DIGESTER GAS
			Flare, Open Landfill/Digester Gas
			FLARE, PORTABLE
			FLARE, ENCLOSED LANDFILL/DIGESTER GAS
			FLARE, ENCLOSED LANDFILL/DIGESTER GAS
			Flare, Open Landfill/Digester Gas
			FLARE, OTHER
			FLARE, PORTABLE
Flowcoater	40202240	FLOWCOATER	
Food Processing	30202002	FEED AND FOOD MISC PRODUCTION	
	30299999	CHARBROILER, FOOD MANUFACTURING	
		FEED AND FOOD MISC PRODUCTION	
		FLOUR MILLING	
		FOOD PROCESSING-GRINDING,BLENDING,PACKAG	
		FOOD PROCESSING-GRINDING,BLENDING,PACKAGING, CONVEY,FLAVORIN	
		NUT ROASTER	
		OTHER FEED & FOOD DRYING	
		OTHER FEED & FOOD SIZE CLASSIFICATION	
Fractionation	30112006	FRACTIONATION UNIT	
Fueling	20400110	JET-A FUELING	
		JET-A FUELING	
Fumigation	30112006	FUMIGATION	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Garnetting	33000198	COTTON AND WOOL, GARNETTING	
		GARNETTING PAPER/POLYESTER PAPER	
		GARNETTING PAPER/POLYESTER POLYESTER	
Gas Plant	30300315	GAS PLANT	
		GAS PLANT	
Glass Manufacturing	30112006	GLASS FORMING MACHINE	
HDS	30300920	HYDRODESULFURIZATION UNIT (HDS)	
		HYDROGEN DESULFURIZATION UNIT	
Heater/Furnace	30300915	FURNACE ELECT IND & RES IRON-STEEL	
		FURNACE OTHER MET OPS IRON-STEEL	
		FURNACE OTHER MET OPS IRON-STEEL	
		FURNACE, BURN-OFF, OTHER	
	30400101	FURNACE POT ALUMINUM	
	30400102	FURNACE CRUCIBLE ALUMINUM	
		FURNACE ELECT IND & RES ALUMINUM	
		FURNACE OTHER MET OPS ALUMINUM	
	30400103	FURNACE REVERB (ROTARY) ALUMINUM	
		FURNACE REVERB (SWEATING) ALUMINUM	
		FURNACE REVERB ALUMINUM	
		FURNACE REVERB ALUMINUM	
	30400219	FURNACE CRUCIBLE BRASS YELLOW	
		FURNACE CRUCIBLE BRASS-OTH BRONZE	
		COPPER	
30400304	FURNACE ARC IRON-STEEL		
	FURNACE ARC IRON-STEEL		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Heater/Furnace, continued	30400401	FURNACE POT LEAD & TYPE METAL	DRY FILTER (>5 SQ FT)	
			DUST COLLECTOR CARTRIDGE TYPE	
			DUST COLLECTOR/HEPA, OTHER R-141 TOXICS	
	30400510	FURNACE CRUCIBLE LEAD & TYPE METAL		
	30400704	FURNACE BURN-OFF PAINT	FURNACE POT LEAD & TYPE METAL	DUST COLLECTOR/HEPA, OTHER R-141 TOXICS
			HEAT TREATING FURNACE	
			HEAT TREATING FURNACE	
			HEAT/FURN (<5 MMBTU/HR) COMB EXC LFG/DG	LOW NOX BURNER
			HEATER	
			HEATER/FURNACE (<5 MMBTU/HR) GASOLINE	
			HEATER/FURNACE (<5 MMBTU/HR) NAT GAS	
			HEATER/FURNACE (<5 MMBTU/HR) NG & DG	
			HEATER/FURNACE (<5 MMBTU/HR) NG & DG	
			HEATER/FURNACE (<5 MMBTU/HR) NG & MISC	
			HEATER/FURNACE (<5 MMBTU/HR) NG/PG & LPG	
			HEATER/FURNACE (<5 MMBTU/HR) OTH FUEL	
HEATER/FURNACE (>2-5 MMBTU/HR)PROC GAS				

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Heater/Furnace, continued	30400704	HEATER/FURNACE (>5 MMBTU/HR) PROC GAS	
		HEATER/FURNACE (>5 MMBTU/HR)PROCESS GAS	
		HEATER/FURNACE (5-2 MMBTU/HR) DIESEL	
		HEATER/FURNACE (5-2 MMBTU/HR) GAS-LPG	
		HEATER/FURNACE (5-2 MMBTU/HR) NG & MISC	
		HEATER/FURNACE (5-2 MMBTU/HR) OTH FUEL	
		HEATER/FURNACE (5-2 MMBTU/HR) PROC GAS	
		30400803	
	30400824	FURNACE GRAPHITIZATION & CARBONIZATION	
	30400842	FURNACE REVERB ZINC & KIRKSITE	
	30400867	FURNACE POT TIN & SOLDER	
		FURNACE POT ZINC & KIRKSITE	
	30402211	HEAT TREATING QUENCH TANK	
	30501401	GLASS MELTING FURNACE >5 TPD PULL	
		GLASS MELTING FURNACE >5 TPD PULL	
30902501	FURNACE BURN-OFF ARMATURE		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Heater/Furnace, continued	39900601	FURNACE OTHER MET OPS MISC METALS	
		HEATER/FURNACE (>2-5 MMBTU/HR) NAT GAS	
		HEATER/FURNACE (>2-5 MMBTU/HR) NG & PG	
		HEATER/FURNACE (5-2 MMBTU/HR) NAT GAS	
	HEATER/FURNACE (5-2 MMBTU/HR) NAT GAS		
39901601	HEATER/FURNACE (<5 MMBTU/HR) OTHER FUEL		
Hydrotreating Unit	30402201	HYDROTREATING UNIT	
		HYDROTREATING UNIT	
ICE	20100101	EMERGENCY FIRE PUMP IC ENGINE	
		Emergency ICE	
		I C E (>5 HP) DIESEL	
		I C E (>5 HP) EM ELEC GEN DIESEL	
		I C E (>5 HP) EM ELEC GEN- NG & LPG	
		I C E (>5 HP) EM ELEC GEN-DIESEL	
		I C E (>5 HP) EM ELEC GEN-NAT GAS	
		I C E (>5 HP) EM ELEC GEN-OIL	
		I C E (>5 HP) EM ELEC-GEN OTH FUEL	
		I C E (>5 HP) EM FIRE FGHT-DIESEL	
		I C E (>5 HP) EM FLOOD CTL-DIESEL	
		I C E (>5 HP) EM FLOOD CTL-NG & LPG	
		I C E (>5 HP) LANDFILL GAS	CO OXIDATION CATALYST/NON UTILITY COMBU
		I C E (>5 HP) METHANOL	
	I C E (>5 HP) NAT & DIGESTER GAS		
	I C E (>5 HP) NAT & PROC GAS	NON SELECTIVE CATALYTIC REDUCTION	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
ICE, continued	20100101	I C E (>5 HP) NAT GAS		
		I C E (>5 HP) NAT GAS & MISC FUEL		
		I C E (>5 HP) N-EM PORT N-RENT DIESEL		
		I C E (>5 HP) N-EM PORT N-RENT OIL		
		I C E (>5 HP) N-EM PORT RENT DIESEL		
		I C E (>5 HP) N-EM STAT DIESEL		
		I C E (>5 HP) N-EM STAT GAS		
		I C E (>5 HP) N-EM STAT NAT GAS ONLY		NON-CATALYTIC REDUCTION
				SELECTIVE CATALYTIC REDUCTION
		I C E (>5 HP) N-EM STAT NAT GAS ONLY		
		I C E (>5 HP) N-EM STAT OTHER FUEL		
		I C E (>5 HP) OTHER FUEL		
		I C E (>5 HP) PROCESS GAS		
		I C E (5-5 HP) DIESEL		
		I C E (5-5 HP) DIGESTER GAS		
		I C E (5-5 HP) EM ELEC GEN-DIESEL		
		I C E (5-5 HP) EM ELEC GEN-GASOLINE		
		I C E (5-5 HP) EM ELEC GEN-NAT GAS		
		I C E (5-5 HP) EM ELEC GEN-NG & LPG		
		I C E (5-5 HP) EM ELEC GEN-OIL		
		I C E (5-5 HP) EM ELEC-GEN OTH FUEL		
		I C E (5-5 HP) EM FIRE FGHT-DIESEL		
		I C E (5-5 HP) EM FIRE FGHT-OIL		
		I C E (5-5 HP) EM FLOOD CTL-DIESEL		
		I C E (5-5 HP) EM FLOOD CTL-NAT GAS		
		I C E (5-5 HP) EM PORT N-RENT DIESEL		
		I C E (5-5 HP) EMERG OTHER, DIESEL		
		I C E (5-5 HP) EMERG OTHER, NG ONLY		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
ICE, continued	20100101	I C E (5-5 HP) NAT & PROC GAS	NON SELECTIVE CATALYTIC REDUCTION
		I C E (5-5 HP) NAT GAS	
		I C E (5-5 HP) NAT GAS	
		I C E (5-5 HP) N-EM OTHER FUEL	
		I C E (5-5 HP) N-EM PORT N-RENT DIESE	
		I C E (5-5 HP) N-EM PORT N-RENT OIL	
		I C E (5-5 HP) N-EM PORT RENT DIESEL	
		I C E (5-5 HP) N-EM STAT DIESEL	
		I C E (5-5 HP) N-EM STAT GAS-LPG	
		I C E (5-5 HP) N-EM STAT NAT GAS ONLY	
		I C E (5-5 HP) N-EM STAT OIL ONLY	
		I C E (5-5 HP) NG/PG & LPG	
		I C E (5-5 HP) OTHER FUEL	
		I C E (5-5 HP) OTHER FUEL	
		I C E (5-5 HP)N-EM PRT N-RENT GAS-LPG	
		ICE	
		ICE (>5 hp) EM PORT N-RENT DIESEL	
		ICE TEST CELL – ANY FUEL/HP	
		INTERNAL COMBUSTION ENGINE	
Incineration	50100505		WASTE GAS INCINERATION UNIT
	50200505	INCIN PATHOLOGICAL 3-499 LB/HR	
Isomerization Unit	306999	ISOMERIZATION UNIT	
		ISOMERIZATION UNIT	
Laser	30300999	LASER CUTTER	
		LASER ENGRAVING, RUBBER AND PLASTIC	
Laundry Tumbler	30400725	LAUNDRY TUMBLER	BAGHOUSE, AMBIENT TEMP (>1-5 SQ FT)
Meat Products	30400732	MEAT PRODUCTS, SIZE CLASS	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Melting	30105114	ADHESIVES MELTING	
	30400868	MISCELLANEOUS, FLUIDIZATION(MELT)	
Mesh Pad	30101705		MESH PAD, OTHER ACID MISTS
MFG	30509203	CATALYST MFG	
Mist Control	0		MIST CONTROL
	30901006		MIST ELIMINATOR, HEPA
	40201601		MIST CONTROL
Molding	30501199	CONCRETE MOLDING	
	30502505	FOUNDRY SAND MOLD, COLD FORMING PROCESS	
	30801007	PLASTICS AND RESINS MOLDING	
Odor Control	88252		ODOR CONTROL UNIT
		MERCAPTANS, ODORIZING	
		NATURAL GAS ODORIZING UNIT	
		ODOR CONTROL UNIT	
Oven	30201651	OVEN, DRYING	
	30203202	OVEN	
		OVEN BAKERY	
		OVEN BAKERY	
		OVEN BAKERY	
		OVEN, BAKING	
		OVEN, COOKING OR CURING	
		OVEN, COOKING OR CURING	
		OVEN, CURING (RULE 141 TOXICS)	
		OVEN, OTHER	
	30300303	OVEN, OTHER	
		DELAYED COKING (HEAVY CUT)	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Oven, continued	30300303	DELAYED COKING UNIT	
	30400354	CORE OVEN	
	30404901	Oven, Fabric (Tenter frame)	AFTERBURNER, DIRECT FLAME
	30500504	OVEN, PLASTISOL CURING	
	30500850	KILN NAT GAS	
	30800705	OVEN, PLASTIC/RESIN CURING	
		WAX BURN-OFF OVEN	
	30801006	OVEN, PLASTIC/RESIN CURING	
		OVEN, POWDER COATING]	
	40200801	OVEN, POWDER COATING]	SPRAY BOOTH/ENCLOSURE, POWDER COATING SY
	40500811	OVEN, SCREEN PRINTING	
	64931031	OVEN, DRYING	
		OVEN, DRYING	
Oxidizer	405002		REGENERATIVE OXIDIZER
		CATALYST OXIDATION	
			REGENERATIVE OXIDIZER
			Thermal Oxidizer
Packaging	30104501	CEMENT PACKAGING	
		CONCRETE PACKAGING	
		COSMETICS PACKAGING	
		FLY ASH PACKAGING	
		MEAT PRODUCTS PACKAGING	
		NATURAL FERTILIZER PACKAGING/PROCESSING	
	30500609	HOUSEHOLD PET FOOD PACKAGING	
		MISC MINERALS PACKAGING	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Pelletizing	30101821	SULFUR PELLETTIZING	
Pillow Filling Machine	31614001	PILLOW FILLING MACHINE	
Plasma Arc Cutting	30903008	PLASMA ARC CUTTING	
Plating	30901006	TANK, HARD CHROME PLATING	
Printing	40500301	FLEXOGRAPHIC PRINTING PRESS, UV DRY	
		PRINTING PRESS FLEXOGRAPHIC AIR DRY	
	40500411	LITHOGRAPHIC PRINTING PRESS, IR DRY	
		LITHOGRAPHIC PRINTING PRESS, IR DRY	
		LITHOGRAPHIC PRINTING PRESS, UV DRY	
		PRINTING PRESS LITHOGRAPHIC AIR DRY	Activated Carbon Adsorber Drum Vent m.s.
			AFTERBURNER, DIRECT FLAME
		PRINTING PRESS LITHOGRAPHIC AIR DRY	
		PRINTING PRESS LITHOGRAPHIC HEAT SET	AFTERBURNER, DIRECT FLAME
	PRINTING PRESS LITHOGRAPHIC HEAT SET		
	40500421	PRINTING PRESS FLEXOGRAPHIC HEAT SET	AFTERBURNER, DIRECT FLAME
		PRINTING PRESS FLEXOGRAPHIC HEAT SET	
		PRINTING PRESS MISC AIR DRY	
		PRINTING PRESS MISC HEAT SET	
		PRINTING PRESS SCREEN (ALL)	
		PRINTING PRESS SCREEN (ALL)	
	40500597	Printing Press w/ IR or UV Oven	
PRINTING, OTHER, IR DRY			

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Production/Crushing	30100308	CARBON DIOXIDE PRODUCTION PLANT	ACTIVATED CARBON ADSORBER OTHER
	30101498	PAINTS PRODUCTION	
	30107101	HYDROGEN MFG, REFORMING	
		HYDROGEN PRODUCTION PLANT	
		HYDROGEN PRODUCTION PLANT	
	30200999	BEER MFG SYSTEM	
	30405099	MISC MATERIALS PRODUCTION	
	30500609	MISCELLANEOUS MACHINING	
		SYNTHETIC FERTILIZER PRODUCTION	
	30500709	Aggregate Crushing (<5 tpd)	
		Aggregate Prod/Crush (>5 tpd)	
		AGGREGATE PRODN/CRUSH >= 5 TPD	
		AGGREGATE PRODUCTION/CRUSHING	
		AGGREGATE PRODUCTION/CRUSHING/DRYER	
		AGGREGATE PRODUCTN/CRUSHING (<5 TPD)	
31401541	POLYURETHANE FOAM MFG		
Railroad unloading	30508912	RAILROAD CAR UNLOADING MISCELLANEOUS	
Reaction	30299998	BORAX&BORON COMPS.,REACTION	
		BORAX&BORON COMPS.,REACTION	
		CORN PRODUCTS, REACTION-BAKING	
		DIGESTER (CHEM. SOLID PHASE REACTION)	
		FEED AND OTHER FOOD - REACTION	
		FERRIC CHLORIDE, REACTION	
		HOUSEHOLD PET FOOD REACTION-BAKING	
		HOUSEHOLD PET FOOD REACTION-COOKING	
		MISC INORGANIC ACID REACTION	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Reaction, continued	30299998	MISC MATERIAL - REACTION		
		MISC ORGANIC ACID REACTION		
		MISC ORGANIC CHEMICALS - REACTION		
		MISCELLANEOUS, REACTION ORGAN ADD		
		PAINTS, REACTION		
		PHARMACEUTICALS, REACTION		
		PHARMACEUTICALS, REACTION ORGAN ADD		
		VEGETABLE OILS, REACTION-ORGANIC ADD		
		ZINC (ZINC OXIDE) REACTION-OXIDATION		
Reclamation	30400510	FOUNDRY SAND RECLAMATION		
		SOLV RECLAIM STILL (1 STAGE) MISC. SOLV		
Reduction	30102601	NATURAL RUBBER SIZE REDUCTION		
	30200805	FEED & FOOD PRODUCTS SIZE REDUCTION		
		GRAINS SIZE REDUCTION		
	30400299	COPPER SIZE REDUCTION		
	30501199	CLAY SIZE REDUCTION		
		MISCELLANEOUS DISTILLATION		
		NATURAL RUBBER SIZE REDUCTION		
	30501416	GLASS & FRIT SIZE REDUCTION		
	30502709	CLAY SIZE REDUCTION		
		CLAY SIZE REDUCTION		
		CONCRETE SIZE REDUCTION		
		FOUNDRY SAND SIZE REDUCTION		BAGHOUSE, AMBIENT TEMP (>5 SQ FT)
		MISC MINERALS SIZE REDUCTION		
		OTHER AGGREGATE SIZE REDUCTION		
	30899999	SILICA SIZE REDUCTION		
PLASTIC/RESIN SIZE REDUCTION				

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Research Operations	31306599	PLAN, RULE 441 RESEARCH OPERATIONS DEMO	
Retort	30400801	MULT CHAMBER WITH PATHOLOGICAL RETORT	
Ripening	30299999	Banana Ripening Rooms	
Roasting	30200201	COFFEE ROASTING, >= 1 LBS. CAPACITY	
		OTHER FEED & FOOD, ROASTING	
		PER&VERM&ZONA-LITE,ROASTING	
Rubber Production	30500304	OVEN, RUBBER CURING	
	30504572	FOAMS, PLASTIC, & RUBBER PACKAGING	
	30602201	RUBBER PRESSES/MOLDS W/ RAM DIAMENTER >2	
		RUBBER PRODUCTION	
		RUBBER ROLL MILL	
SCR	30301402	SCR	
Screening	50100707	GREEN WASTE SCREENING	
Scrubber	30130101		SCRUBBER, ODOR
			Scrubber, Other Chemical Venting S.S.
			SCRUBBER, OTHER VENTING S.S.
			Scrubber, Controlling HCL or NH3 Vent ms
			Scrubber, Controlling HCL or NH3 Vent ss
			SCRUBBER, NOx, SINGLE STAGE
			SCRUBBER, ODOR
			Scrubber, Other Chemical Venting S.S.
			SCRUBBER, OTHER VENTING M.S.
			SCRUBBER, OTHER VENTING S.S.
Scrubber, Particulates Venting M.S>			

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Scrubber, continued	30130101		SCRUBBER, VENTURI VENTING m.s.	
			Scrubber, Venturi Venting t.s.	
Semiconductor	313065	SEMICONDUCTOR MANUFACTURING OPERATIONS		
		SEMICONDUCTOR, INTEGRATED CIRCUIT <5 PCS		
		SEMICONDUCTOR, INTEGRATED CIRCUIT >=5 PC		
		SEMICONDUCTOR, PHOTORESIST (<5 PIECES)		
		SEMICONDUCTOR, PHOTORESIST (>=5 PIECES)		
		SEMICONDUCTOR, PHOTORESIST (>=5 PIECES)		
		SEMICONDUCTOR, PHOTORESIST (>=5 PIECES)		
		SEMICONDUCTOR, SOLVENT CLEANING (<5 PCS)		
		SEMICONDUCTOR, SOLVENT CLEANING >=5 PCS		
		Separation		31000107
CRUDE OIL/GAS/H2O SEP SYS (< 3 BPD)				
CRUDE OIL/GAS/H2O SEP SYS (< 3 BPD)				
Crude Oil/Gas/H2O Separation >=3-<4BPD	VAPOR RECOVERY UNIT COMPRESS & CONDENSE			
CRUDE OIL/GAS/WATER SEP SYS (>5 TKS)				
Crude Oil/Gas/Water Separation >=4 BPD				
Crude Oil/Gas/Water Separation >=4 BPD				
Crude Oil/Gas/Water Separation >=4 BPD				

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Separation, continued	31000107	CRUDE OIL/WATER SEPARATOR(>= 1, GPD)	
		GASOLINE SEPARATION-LIQUID PRODUCTION	
		LPG SEPARATION	
		MISC MATERIALS SEPARATION	
		MISC ORGANIC CHEMICALS SEPARATION	
		REFINED OIL/WATER SEPARATOR	
Shredder	30701301	SHREADER	
	31401101	AUTO BODY SHREDDING	
		AUTO BODY SHREDDING	
Sludge	50100793	SEWAGE SLUDGE DRYING	ACTIVATED CARBON ADSORBER OTHER
		SLUDGE DEWATERING	
		SLUDGE DRYER	
Snack Line	0	Snack Line	
Soil Treat Vapor Extract	30622204	SOIL TREAT VAPOR EXTRACT GASOLINE ABOVE	AFTERBURNER, CATALYTIC
		SOIL TREAT VAPOR EXTRACT GASOLINE ABOVE	AFTERBURNER, CATALYTIC
		SOIL TREAT VAPOR EXTRACT GASOLINE UNDER	Afterburner, Catalytic, </=1 mmBTU/hr
			AFTERBURNER, DIRECT FLAME
		SOIL TREAT VAPOR EXTRACT GASOLINE UNDER	
		SOIL TREAT VAPOR EXTRACT GASOLINE UNDER	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Soil Treat Vapor Extract, continued	30622204	SOIL TREAT VAPOR EXTRACT OTHER VOC ABOVE		
		SOIL TREAT VAPOR EXTRACT OTHER VOC UNDER		
		SOIL TREATMENT, OTHER		
Soldering	30904300	SOLDER LEVELING		
		SOLDERING MACHINE		
Spray Booth and Equipment	30906001		SPRAY BOOTH OTHER	
			SPRAY BOOTH PAINT AND SOLVENT	
			SPRAY BOOTH(S) (1 – 5) W/ AFTERBURNER	
			SPRAY BOOTH, AUTOMOTIVE	
			SPRAY BOOTH/ENCLOSURE, POWDER COATING SYSTEM	
			SPRAY BOOTH PAINT AND SOLVENT	
			SPRAY BOOTH STYRENATED RESINS	
			SPRAY BOOTH(S) (1 – 5) W/ AFTERBURNER	
			SPRAY BOOTHS (>5) WITH AFTERBURNER	
			SPRAY BOOTH/ENCLOSURE, POWDER COATING SYSTEM	
			POWDER BOOTH	
			SPRAY EQUIPMENT OPEN	
			SPRAY EQUIPMENT OPEN ARCHITECTURAL	
			SPRAY MACHINE – ADHESIVE	
			SPRAY MACHINE – COATING	
			SPRAY MACHINE – COATING	
	Spray Machine, Powder Coating			
		SPRAY BOOTH		
		SPRAY BOOTH (S) W/ CARBON ADSORBER (REGE		
		SPRAY BOOTH CERAMIC		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Spray booth and Equipment, continued	30906001		SPRAY BOOTH HIGH-WATER PAINT
			SPRAY BOOTH METALLIZING
			SPRAY BOOTH OTHER
			SPRAY BOOTH PAINT AND SOLVENT
			SPRAY BOOTH STYRENATED RESINS
			SPRAY BOOTH WITH MULTIPLE VOC CONTROL EQ
			SPRAY BOOTH(S) (1 – 5) W/ AFTERBURNER
			SPRAY BOOTH, AUTOMOTIVE
			SPRAY BOOTH, AUTOMOTIVE, W/ MULTIPLE VOC
			SPRAY BOOTH/ENCLOSURE, POWDER COATING SY
			SPRAY BOOTH/ENCLOSURE, POWDER COATING SYSTEM
			SPRAY BOOTHS (>5) WITH AFTERBURNER
			SPRAY BOOTHS (MULTIPLE) W/CARBON ADSORBE
SPRAY BOOTHS (MULTIPLE) WITH MULTIPLE VO			
Stripping	30101401	NICKEL STRIPPING TANK	Scrubber, Particulates Venting M.S>
		PAINT STRIPPING W/ MOLTEN CAUSTIC	
		PAINTS STRIPPING	
	30622401	AIR STRIPPING	
	40100302	PAVEMENT STRIPER	
Tail Gas Incinerator	39990013		TAIL GAS INCINERATOR
Tanks and Storage	4079999	STORAGE TANK OTHER W/CTL NAPHTHA	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Tanks and Storage, continued	30100310	AQUEOUS AMMONIA STORAGE & TRANSFER SYS		
		STORAGE TANK AMMONIA		
		STORAGE TANK W/ EXT FLOAT RF PET MID DIS		
		STORAGE TANK W/ EXT FLOAT ROOF ALCOHOLS		
		STORAGE TANK W/ EXT FLOAT ROOF FUEL OIL		
		STORAGE TANK W/ EXT FLOAT ROOF GASOLINE		
		STORAGE TANK W/ EXT FLOATING ROOF CRUDE		
		STORAGE TANK W/ VAPOR CONTROL AMMONIA		
		STORAGE TANK W/INT FLOAT ROOF HYDROCARB		
		30101198		SERV STAT STORAGE & DISPENSING GASOLINE
	30102321	TANK, SURFACE PREPARATION – OTHER ACIDS		
	30187005	TANK, NITRIC ACID		Scrubber, Controlling Nox Venting
	30187597	STORAGE TANK MISC INORGANIC ACID		
	30200740	Grain Handling (combining storage&clean)		
	30201407	STORAGE CONTAIN, BAKER-TYPE W/CTL CRUDE		
		STORAGE SILO MISC MATERIALS		
	STORAGE SILO MISC ORGANIC CHEMICALS			
	STORAGE TANK ALCOHOLS			

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Tanks and Storage, continued	30201407	STORAGE TANK FX RF W/ INT FLOATER CRUDE		
		STORAGE TANK FX RF W/ INT FLOATER CRUDE		
		STORAGE TANK FX RF W/ INT FLT FUEL OIL		
		STORAGE TANK FX RF W/ INT FLT PET DISTIL		
		STORAGE TANK FX RF W/CTL CRUDE OIL		
		STORAGE TANK FX RF W/CTL MISC ORG CHEM		
		STORAGE TANK FX RF W/CTL MISC ORG MATERL		Activated Carbon Adsorber Drum Vent m.s.
		STORAGE TANK FX RF W/CTL PET MID DISTILL		
		STORAGE TANK FX RF W/INT FLT GASOLINE		
		STORAGE TANK KETONES		
		STORAGE TANK METHANOL		
		STORAGE TANK POLYETHYLENE		
		STORAGE TANK SILICA SAND		
	STORAGE TANK STARCH			
	30201939	STORAGE TANK VEGETABLE OILS		
	30203204	STORAGE SILO FLOUR		
		STORAGE TANK FLOUR		
	30400106	TANK DEGASSING, ABOVEGROUND	AFTERBURNER, DIRECT FLAME	
		TANK DEGASSING, UNDERGROUND, OTHER		
	30401099	TANKS, NICKEL PLATING LINE	SCRUBBER, OTHER VENTING S.S.	
30500213	STORAGE SILO CEMENT	ABSORBER		
	STORAGE TANK ASPHALT <=5, GALLONS			

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Tanks and Storage, continued	30500213	STORAGE TANK ASPHALT <=5, GALLONS	
	30500999	STORAGE OTHER FLYASH	
		STORAGE SILO CEMENT	
		STORAGE SILO FLY ASH	
		STORAGE TANK, CRUDE OIL W/O CONTROL	
	30501107	STORAGE TANK CEMENT	
	30501610	STORAGE SILO LIME & LIMESTONE	
	30510296	STORAGE SILO MINERALS MISC	
		STORAGE SILO MISC MATERIALS	
		STORAGE SILO MISC ORGANIC MATERIALS	
		STORAGE SILO POLYVINYL CHLORIDE	
		STORAGE SILO SILICA SAND	
	30510299	STORAGE TANK OTHER W/CTL MISC MINERALS	
		STORAGE TANK OTHER W/CTL MISC SOLVENTS	
		STTK FX RF W/INT FLT MISC ORG CHEM	
		STTK FX RF W/INT FLT MISC ORG CHEM	
	30510498	AGGREGATE STORAGE BIN	
		AGGREGATE TANK TRUCK LOADING	
	30622202	STORAGE TANK, LPG W/ VAPORIZING SYSTEM	
	30702099	STORAGE TANK WOOD PRESERVATIVES	
	30901002	TANK, PRECIOUS METAL - PLATING	
	30901003	STORAGE SILO LIME & LIMESTONE	
		TANK NICKEL PLATING	
		TANKS, NICKEL PLATING LINE	
	30901006	TANK, DECORATIVE CHROME PLATING	
	30901007	TANK, CADMIUM - PLATING	
	30901028	TANK CHROME PLATING HEXAVALENT	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description		
Tanks and Storage, continued	30901038	Tank, plating other			
		TANK, CHROMIC ACID – ANODIZING			
		Tank, Plating (other)			
		Tank, plating other			
		TANK, SULFURIC/PHOSPHORIC ACID – ANODIZI			
		TANK, SULFURIC/PHOSPHORIC ACID – ANODIZING			
	30901078	TANK, OTHER AQUEOUS SOLUTION			
	30901501	TANK CHEMICAL MILLING			
	31000104	SUMP, COVERED AND CONTROLLED		ACTIVATED CARBON ADSORBER OTHER	
	31306501	TANK, OTHER AQUEOUS SOLUTION		SCRUBBER, OTHER VENTING S.S.	
	39000689	NATURAL GAS STABILIZATION UNIT			
		NATURAL GAS STABILIZATION UNIT			
	40100398	Tank, plating other			
		MISC STRIPPING TANK			
		MISC STRIPPING TANK			
	40204621	mixing tank			SCRUBBER, OTHER VENTING S.S.
		TANK, SURFACE PREPARATION – OTHER ACIDS			
	40300150	STORAGE TANK FUEL OIL			
	40301017	AVGAS STORAGE & DISPENSE			
	40301022	STORAGE TANK, ASPHALT >5, GALLONS			
	40301120	STORAGE TANK FX RF W/ INT FLT FUEL OIL			
		STORAGE TANK FX RF W/ INT FLT FUEL OIL			
		STORAGE TANK FX RF W/ INT FLT PET DISTIL			

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Tanks and Storage, continued	40301120	STORAGE TANK FX RF W/ INT FLT PET DISTIL	ACTIVATED CARBON ADSORBER,DRUM VENT M.S.
		STORAGE TANK FX RF W/CTL PET MID DISTILL	
		STORAGE TANK PETROLEUM MIDDLE DISTILLATE	
		STORAGE TANK PETROLEUM MIDDLE DISTILLATE	
		STORAGE TANK W/ EXT FLOAT RF PET MID DIS	
		STORAGE TANK W/ EXT FLOAT RF PET MID DIS	
		STORAGE TANK W/ EXT FLOAT RF PET MID DIS	
	40301145	STORAGE TANK AVGAS	
	40301151	STORAGE TANK FX RF W/INT FLT GASOLINE	
		STORAGE TANK FX RF W/INT FLT GASOLINE	
		STORAGE TANK FX RF W/INT FLT GASOLINE	
		STORAGE TANK-GAS DOME EXT.FLOAT ROOF	
		STORAGE TANK-GAS DOME EXT.FLOAT ROOF	
	40301152	STORAGE TANK W/ EXT FLOATING ROOF CRUDE	
		STORAGE TANK, CRUDE OIL W/O CONTROL	
	40400106	STORAGE TANK W/ EXT FLOAT ROOF GASOLINE	
		STORAGE TANK W/ EXT FLOAT ROOF GASOLINE	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Tanks and Storage, continued	40400106	STORAGE TANK W/ EXT FLOAT ROOF GASOLINE	
	40400107	MOBILE REFUEL STORAGE/DISPENSE GASOLINE	
		STORAGE TANK FX RF W/CTL GASOLINE	
		STORAGE TANK FX RF W/CTL GASOLINE	
		STORAGE TANK FX RF W/CTL MISC	
		STORAGE TANK FX RF W/CTL MISC	
	40400121	DIESEL STORAGE AND DISPENSING FACILITY	
		STORAGE TANK DIESEL	
		STORAGE TANK W/ EXT FLOAT ROOF DIESEL	
	40600136	SERV STAT STORAGE & DISPENSING GASOLINE	
		SERV STAT STORAGE & DISPENSING GASOLINE	
		SERV STAT STORAGE & DISPENSING GASOLINE	
	40700898	STORAGE TANK OTHER W/ CTL ALCOHOLS	
	40703202	STORAGE TANK FX RF W/CTL HYDROCARBONS	
		STORAGE TANK FX RF W/CTL SOLVENTS N E C	
		STORAGE TANK HYDROCHLORIC ACID	
		STORAGE TANK SULFURIC ACID	
		SUMP, COVERED AND CONTROLLED	
		SURFACE PREP TANK CONT. CHROMIC ACID	
	40703616	STORAGE TANK W/ EXT FLOAT ROOF HYDROCARB	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Tanks and Storage, continued	40703616	STORAGE TANK W/ EXT FLOAT ROOF HYDROCARB	
		STORAGE TANK W/INT FLOAT ROOF HYDROCARB	
		STORAGE TANK W/INT FLOAT ROOF HYDROCARB	
		STORAGE TANK W/INT FLOAT ROOF HYDROCARB	
	40706007	STORAGE TANK HYDROCARBONS MISC	
		STORAGE TANK HYDROCARBONS MISC	
	40714697	CONTAINER FILL LIQUID MISC ORG CHEMS	
		CONTAINER FILL LIQUID MISC ORG CHEMS	
		CONTAINER FILLING LIQUID ADHESIVES	
	40715801	SERV STAT STORAGE & DISPENSING E-85	
	40717601	STORAGE TANK CYCLOHEXANE	
	40729697	STORAGE TANK W/ EXT FLOAT ROOF MISC MATL	
		STORAGE TANK W/ EXT FLOAT ROOF NAPHTHA	
		TANK DEGASSING UNIT	
		TANK DEGASSING, ABOVEGROUND	
	40781602	STORAGE TANK PRESSURE TANK BUTANE	
	40799997	STORAGE TANK FX RF W/CTL MISC ORG CHEM	
		STORAGE TANK FX RF W/CTL MISC ORG CHEM	
		STORAGE TANK FX RF W/CTL MISC ORG MATERL	
	40799999	STORAGE TANK MISC MATERIALS	
		STORAGE TANK MISC MATERIALS	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Tanks and Storage, continued	40799999	STORAGE TANK MISC ORGANIC MATERIALS	
		STORAGE TANK ORGANIC CHEMICALS MISC	
		STORAGE TANK ORGANIC CHEMICALS MISC	
	50400103	STORAGE TANK W/ EXT FLOAT ROOF WASTE H2	
Tar Pot	10500205	TAR POT	
		TAR -POT	
		TAR-POT	
Tire Buffer	30800501	TIRE BUFFER	
Treating	20100207	NATURAL GAS TREATING	
	20100802	LANDFILL GAS TREATING	
	30201911	FRUIT AND VEG.TREATING (ETHYLENE GEN.)	
	30402201	AMINE TREATING UNIT	
		AMINE TREATING UNIT	
		COPPER TREATING	
		FUEL GAS, TREATING	
		HYDROCARBONS MISC TREATING	
		HYDROGEN SULFIDE TREATING	SCRUBBER, OTHER VENTING M.S.
		LIGHT DISTILLATE TREATING	
		MEROX TREATING UNIT	
		MEROX TREATING UNIT	
		PAPER TREATING	
		TIN TREATING	
		Treating, Petroleum Distillates	
		Treating, Petroleum Distillates	
	WOOD MATERIAL TREATING		
	30600506	GROUNDWATER TREATMENT SYSTEM	ABSORBER

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description	
Treating, continued	30600506	GROUNDWATER TREATMENT SYSTEM		
Turbine Engine	20100801	TURBINE ENGINE (<=5 MW) LANDFILL GAS		
Turbine Engine < 5 MW	20100101	GAS TURBINE, EMERGENCY, < .3 MW		
	20200201	GAS TURBINE-DIG. GAS/LDF <3 KW		
	20300203	TURBINE ENG, <5 MMBTU/HR, NAT GAS, COGEN		
Turbine Engine > 50 MW	20200203	TURBINE ENG, >5 MMBTU/HR, NAT GAS COGEN	SELECTIVE CATALYTIC REDUCTION	
		TURBINE ENGINE (>5 MW) NAT GAS/DISTILL		
	20400302	JET ENGINE TEST FACILITY OTHER FUEL		
	60X0003X	TURBINE ENGINE (>5 MW) NAT GAS ONLY		
		Turbine Engine (>5MW), natural gas only		
	60X0007X	TURBINE ENGINE (>5 MW) EL PEAK OTH FUEL		
		TURBINE ENGINE (>5 MW) OTHER FUEL		
		TURBINE ENGINE (>5 MW) OTHER FUEL		
		TURBINE ENGINE (>5 MW) OTHER FUEL		
	Turbine Engine 5 - 50 MW	20100801		TURBINE ENGINE (<=5 MW) LANDFILL GAS
20200101			TURBINE ENGINE (<=5 MW) DIESEL	
TURBINE ENGINE (5-2 MMBTU/HR) DIESEL				
20300202		TURBINE ENGINE (<=5 MW) EL PEAK NG ONLY		
		TURBINE ENGINE (<=5 MW) N G & MISC		
		TURBINE ENGINE (<=5 MW) NAT GAS ONLY		
		TURBINE ENGINE (<=5 MW) NAT GAS ONLY	SELECTIVE CATALYTIC REDUCTION	
	TURBINE ENGINE (<=5 MW) NAT GAS ONLY	SELECTIVE CATALYTIC REDUCTION		

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Turbine Engine 5 - 50 MW, continued	20300202	TURBINE ENGINE (<=5 MW) NAT GAS ONLY	
	20300203	TURBINE ENGINE (<=5 MW) NAT GAS-LDF GAS	
		TURBINE ENGINE (<=5 MW) NG/PG & DISTILL	
		TURBINE ENGINE (<=5 MW) NG/PG & OTH OIL	
	60X0007X	TURBINE ENGINE (<=5 MW) DIGESTER GAS	
		TURBINE ENGINE (<=5 MW)ELE PEAK OTHFUEL	
Unknown	Unknown	#N/A	#N/A
Unspecified Equip/Proc	30501199	UNSPECIFIED EQUIP/PROCESS (SCH C)	Unspecified Equip/Process (Sch D)
Vapor Recovery	30600401	VAPOR RECOVERY SERVING CRUDE OIL PRODUCTION SYSTEM	VAPOR RECOVERY SERVING REFINERY UNIT
			VAPOR RECOVERY SERVING BULK LOADING
			VAPOR RECOVERY SERVING CRUDE OIL PRODUCT
			VAPOR RECOVERY SERVING CRUDE OIL PRODUCTION SYSTEM
			VAPOR RECOVERY SERVING REFINERY UNIT
			VAPOR RECOVERY UNIT COMPRESS & CONDENSE
Waste Water	50100704	SEWAGE TREATMENT (<=5 MMG/D)	
		SEWAGE TREATMENT (>5 MG/D) AEROBIC	
		SEWAGE TREATMENT (>5 MG/D) ANEROBIC	
		SEWAGE TREATMENT (>5 MG/D) ANEROBIC	

Table C1-1, continued. BCAT/CCAT Descriptions for Permit Categories and SCCs Used in Analysis

Permit Category	SCC	BCAT description	CCAT description
Wastewater, continued	50100704	Waste H2O Treating >5, GPD	
		Waste H2O Treating >5, GPD	
		Waste H2O Treating >5, GPD	
		WASTE H2O TREATING(<2, GPD) NO TOXIC	
		WASTE H2O TREATING(>=2 - <5 GPD)	
		WASTE WATER CLEANING	
		WASTE WATER EVAPORATION	
		WASTE WATER SEPARATION	
		Waste Water Treating (<1, gpd)	Activated Carbon Adsorber Drum Vent t.s.
		Waste Water Treating (<2, gpd)	
		WASTE WATER TREATING (>5 GAL/DAY)	
		WASTE WATER TREATING (>5 GAL/DAY)	
		WASTE WATER TREATING (>5 GAL/DAY)	
		WASTE WATER TREATING (2-5 GAL/D)	
		Waste Water Treating <2,gpd,no toxic	SCRUBBER, OTHER VENTING S.S.
		Waste Water Treating >=1,-<2,gpd	
		WASTE WATER, REACTION-OXIDATION	
	50410406	CONTAINER FILLING LIQUID WASTE WATER	
Weigh Station	30501223	WEIGH STATION	

Appendix C2: Screening-Level (SCREEN3) Assessment: Supporting Information

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SCREEN3 Input Parameters

Table C2-1. SCREEN3 Point Source Input Parameters

Parameter	Value Used	Units
Scenario Name	Created by ICF	
Source Type	P	
Emission Rate	Specified by Permit	g/s
Stack Height	Based on SCC	m
Stack Diameter	Based on SCC	m
Exit Velocity	Based on SCC	m/s
Stack Gas Exit Temp.	Based on SCC	K
Ambient Air Temp.	293	K
Receptor Height Above Ground	1.5	m
Urban/Rural	U	
Consider Building Downwash?	N	
Complex Terrain Screen?	N	
Simple Terrain Screen?	N	
Meteorology	1	
Automated Distance Array?	Y	
Min Max Distance	minimum was set to fenceline (see Table C-3), maximum set to 10,000	m
Discrete Distances?	N	
Print Results?	N	

Table C2-2. SCREEN3 Flare Input Parameters

Parameter	Value Used	Units
Scenario Name	Created by ICF	
Source Type	F	
Emission Rate	Specified in Permit	g/s
Flare Stack Height	Based on SCC	m
Total Heat Release Rate	Default Value Used	cal/s
Receptor Height above ground	1.5	m
Urban/Rural	U	
Consider Downwash	N	
Complex Terrain?	N	
Simple Terrain?	N	
Choice of Meteorology?	1	
Use Automated Distance Array?	Y	
Min Max Distance	50 (min), 10,000 (max)	m
Discrete Distances?	N	
Print Results?	N	

SCREEN3 Permit Category-Specific Fencelines

Table C2-3. Fencelines Used in SCREEN3 Analysis

Permit Category	Fence-line (m)	Permit Category	Fence-line (m)	Permit Category	Fence-line (m)
Activated Carbon Adsorber	50	Deep Fat Fry	10	Oxidizer	50
Adhesives	50	Degreaser	50	Packaging	50
Adsorption	10	Dehydration	50	Pelletizing	50
Afterburner	50	Deposition	50	Pillow Filling Machine	10
Agriculture Operations	50	Desalinization	50	Plasma Arc Cutting	50
Air Filter	50	Distillation	50	Plating	50
Alkylation	50	Drop Forge	50	Printing	50
Amine	50	Dry Cleaning	10	Production/Crushing	50
Asphalt	50	Dry Filter	50	Railroad unloading	50
Autoclave	50	Drying	50	Reaction	50
Baghouse	50	Electrostatic Precip.	50	Reclamation	50
Biofilter	50	Equipment Process	50	Reduction	50
Blasting	50	Evaporator	50	Research Operations	50
Blending	50	Extruder	50	Retort	50
Boiler < 10 MBTU	50	Flare	50	Roasting	50
Boiler > 50 MBTU	50	Flowcoater	50	Rubber Production	10
Boiler 10 - 50 MBTU	50	Food Processing	10	Screening	50
Bulk Load/Unload	50	Fractionation	50	Scrubber	50
Calcining	50	Fueling	50	Semiconductor	50
Carbon Filer	50	Fumigation	50	Separation	50
Carpet/Textiles Processing	50	Garneting	50	Shredder	50
Catalyst	50	Gas Plant	50	Sludge	50
Catalytic Reduction	50	Glass Manufacturing	50	Soil Treat Vapor Extract	10
Circuit Board Etchers	50	Hydrodesulfurization	50	Soldering	50
Classification	50	Heater/Furnace	50	Spray Booth and Equipment	50
Cleaning	10	Hydrotreating Unit	50	Stripping	10
Coating	50	ICE	50	Tail Gas Incinerator	50
Coffee Roasting	10	Incineration	50	Tanks and Storage	50
Cogeneration	50	Isomerization Unit	50	Tar Pot	10
Collection	50	Laser	50	Tire Buffer	10

MBTU = 1 million British Thermal Units

Table C2-3 (Concluded)
Fencelines Used in SCREEN3 Analysis

Permit Category	Fence-line (m)	Permit Category	Fence-line (m)	Permit Category	Fence-line (m)
Composting	50	Laundry Tumbler	10	Treating	50
Condenser	50	Meat Products	50	Turbine Engine < 5 MW	50
Conveying	50	Melting	50	Turbine Engine > 50 MW	50
Cooling Tower	50	Mesh Pad	50	Turbine Engine 5 - 50 MW	50
Cracking	50	Manufacturing	50	Vapor Recovery	50
Crematory	50	Molding	50	Waste Water	50
Cyclone	50	Oven	50	Weigh Station	50

MW = Megawatts

Screening-Level Results: Threshold Exceedances by Permit Category

In the next three tables, the value in the “No Impact” column indicates the number of permits for which pollutant-specific emissions did not exceed the SCAQMD ambient air quality localized significance threshold. The value in the “Exceeds Threshold” column indicates the number of permits for which pollutant-specific emissions did exceed the indicated SCAQMD significance thresholds. “Total” is the number total number of permits in the indicated permit category for that pollutant included in the screening assessment. A dash (“-”) indicates that no permits in that category report the indicated pollutant.

Table C2-4. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Long-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total
Activated Carbon Adsorber	1	0	1	0	1	1	8	0	8	-	-	-
Adhesives	-	-	-	-	-	-	-	-	-	-	-	-
Adsorption	7	0	7	0	7	7	0	6	6	1	0	1
Afterburner	108	1	109	0	125	125	3	58	61	7	4	11
AGOPS	3	0	3	7	0	7	3	0	3	-	-	-
Air Filter	-	-	-	-	-	-	3	0	3	-	-	-
Alkylation	-	-	-	-	-	-	-	-	-	-	-	-
Amine	-	-	-	-	-	-	-	-	-	-	-	-
Asphalt	32	4	36	4	38	42	2	54	56	14	4	18
Autoclave	1	0	1	0	1	1	0	2	2	-	-	-
Baghouse	-	-	-	-	-	-	4	0	4	-	-	-
Biofilter	-	-	-	-	-	-	-	-	-	-	-	-
Blasting	-	-	-	1	0	1	61	72	133	-	-	-
Blending	8	0	8	5	8	13	95	44	139	1	0	1
Boiler < 10 MBTU	196	0	196	214	0	214	105	4	109	8	0	8

MBTU = 1 million British Thermal Units

Table C2-4, continued. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Long-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total
Boiler > 50 MBTU	14	0	14	10	1	11	11	1	12	12	0	12
Boiler 10 - 50 MBTU	341	0	341	328	0	328	323	5	328	24	0	24
Bulk Load/Unload	6	0	6	0	6	6	7	9	16	2	3	5
Calcining	2	0	2	0	2	2	0	5	5	1	0	1
Carbon Filer	-	-	-	-	-	-	-	-	-	-	-	-
Carpet/Textiles Processing	6	0	6	1	5	6	3	4	7	-	-	-
Catalyst	1	0	1	-	-	-	0	1	1	-	-	-
Catalytic Reduction	3	0	3	2	0	2	10	0	10	1	0	1
Circuit Board Etchers	-	-	-	-	-	-	8	0	8	-	-	-
Classification	7	0	7	0	11	11	0	13	13	1	0	1
Cleaning	3	0	3	2	1	3	2	0	2	-	-	-
Coating	2	0	2	0	3	3	0	7	7	-	-	-
Coffee Roasting	2	0	2	0	8	8	1	1	2	-	-	-
Cogeneration	12	0	12	0	10	10	0	8	8	-	-	-
Collection	-	-	-	-	-	-	-	-	-	-	-	-
Composting	-	-	-	-	-	-	-	-	-	-	-	-
Condenser	-	-	-	-	-	-	4	0	4	-	-	-
Conveying	2	0	2	3	1	4	28	1	29	1	0	1
Cooling Tower	-	-	-	-	-	-	3	0	3	-	-	-
Cracking	0	1	1	0	1	1	0	1	1	0	1	1
Crematory	37	0	37	38	4	42	13	1	14	5	0	5
Cyclone	2	0	2	0	2	2	0	2	2	-	-	-
Deep Fat Fry	15	0	15	19	6	25	38	0	38	2	0	2
Degreaser	-	-	-	-	-	-	-	-	-	-	-	-
Dehydration	-	-	-	-	-	-	-	-	-	-	-	-

Table C2-4, continued. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Long-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total
Desalinization	-	-	-	-	-	-	-	-	-	-	-	-
Distillation	-	-	-	-	-	-	-	-	-	-	-	-
Drop Forge	43	0	43	46	0	46	20	0	20	6	0	6
Dry Cleaning	-	-	-	0	1	1	0	1	1	-	-	-
Dry Filter	-	-	-	-	-	-	2	1	3	-	-	-
Drying	15	0	15	11	5	16	15	4	19	1	0	1
Electrostatic Precip.	-	-	-	-	-	-	1	0	1	-	-	-
Equipment Process	43	0	43	2	37	39	6	72	78	8	0	8
Evaporator	-	-	-	0	2	2	4	0	4	-	-	-
Extruder	-	-	-	-	-	-	15	4	19	-	-	-
Flare	54	0	54	48	0	48	43	0	43	37	0	37
Flowcoater	-	-	-	0	1	1	-	-	-	-	-	-
Food Processing	5	0	5	0	8	8	23	13	36	-	-	-
Fueling	-	-	-	-	-	-	-	-	-	-	-	-
Fumigation	-	-	-	-	-	-	-	-	-	-	-	-
Garnetting	3	0	3	3	0	3	2	0	2	-	-	-
Gas Plant	-	-	-	-	-	-	-	-	-	-	-	-
Glass Manufacturing	-	-	-	-	-	-	-	-	-	-	-	-
HDS	-	-	-	-	-	-	-	-	-	-	-	-
Heater/Furnace	231	0	231	147	100	247	124	40	164	15	6	21
Hydrotreating Unit	-	-	-	-	-	-	-	-	-	-	-	-
ICE	755	0	755	1312	17	1329	320	2	322	73	0	73
Incineration	1	0	1	2	0	2	2	0	2	-	-	-
Laser	-	-	-	-	-	-	4	0	4	-	-	-
Laundry Tumbler	-	-	-	4	7	11	-	-	-	-	-	-

Table C2-4, continued. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Long-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total
Meat Products	-	-	-	-	-	-	1	0	1	-	-	-
Melting	2	0	2	0	2	2	3	0	3	1	0	1
Mesh Pad	-	-	-	-	-	-	2	0	2	-	-	-
MFG	1	0	1	-	-	-	0	1	1	-	-	-
Molding	2	0	2	0	2	2	3	7	10	-	-	-
Oven	264	0	264	316	103	419	97	33	130	5	0	5
Oxidizer	29	0	29	31	0	31	14	0	14	-	-	-
Packaging	3	0	3	0	2	2	0	19	19	-	-	-
Pelletizing	-	-	-	-	-	-	1	0	1	1	0	1
Pillow Filling Machine	-	-	-	-	-	-	0	3	3	-	-	-
Plasma Arc Cutting	-	-	-	-	-	-	2	4	6	-	-	-
Plating	-	-	-	-	-	-	0	1	1	-	-	-
Printing	49	0	49	11	39	50	2	21	23	-	-	-
Production/Crushing	21	6	27	0	30	30	0	50	50	6	4	10
Railroad unloading	-	-	-	-	-	-	1	0	1	-	-	-
Reaction	6	0	6	0	5	5	0	10	10	-	-	-
Reclamation	-	-	-	-	-	-	-	-	-	-	-	-
Reduction	1	0	1	0	2	2	0	35	35	1	0	1
Research Operations	-	-	-	0	1	1	-	-	-	-	-	-
Retort	-	-	-	-	-	-	-	-	-	-	-	-
Roasting	11	0	11	0	12	12	0	6	6	-	-	-
Rubber Production	-	-	-	-	-	-	1	0	1	-	-	-
Screening	-	-	-	-	-	-	0	3	3	-	-	-

Table C2-4, concluded. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Long-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total	No Impact	Exceeds Threshold	Total
Scrubber	3	0	3	0	3	3	2	1	3	2	0	2
Semiconductor	1	0	1	-	-	-	5	0	5	1	0	1
Separation	20	0	20	0	29	29	0	8	8	2	0	2
Shredder	1	0	1	0	1	1	0	5	5	1	0	1
Sludge	1	0	1	0	5	5	0	6	6	2	1	3
Soil Treat Vapor Extract	220	0	220	0	341	341	10	16	26	7	1	8
Soldering	-	-	-	-	-	-	0	15	15	-	-	-
Spray Booth and Equipment	43	0	43	0	468	468	0	1340	1340	0	1	1
Stripping	-	-	-	0	2	2	0	2	2	-	-	-
Tail Gas Incinerator	-	-	-	0	3	3	-	-	-	-	-	-
Tanks and Storage	29	0	29	18	29	47	69	186	255	6	1	7
Tar Pot	16	0	16	32	8	40	31	43	74	8	0	8
Tire Buffer	-	-	-	-	-	-	0	11	11	-	-	-
Treating	2	0	2	1	2	3	0	1	1	-	-	-
Turbine Engine < 5 MW	40	0	40	37	0	37	3	0	3	1	0	1
Turbine Engine > 50 MW	42	0	42	4	29	33	4	50	54	44	0	44
Turbine Engine 5 - 50 MW	37	0	37	4	31	35	4	27	31	32	0	32
Vapor Recovery	3	0	3	0	3	3	0	1	1	-	-	-
Waste Water	1	0	1	0	10	10	0	4	4	0	2	2
Weigh Station	-	-	-	-	-	-	1	0	1	-	-	-
Total	2809	12	2821	2663	1581	4244	1572	2345	3917	340	28	368

MW = megawatt

a) No Impact denotes the permits for which pollutant-specific emissions did not exceed the SCAQMD ambient air quality localized significance threshold. Significant Impact denotes the permits for which pollutant-specific emissions did exceed one or more SCAQMD ambient air quality localized significance thresholds.

Table C2- 5. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Short-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total
Activated Carbon Adsorber	1	0	1	1	0	1	0	8	8	-	-	-
Adhesives	-	-	-	-	-	-	-	-	-	-	-	-
Adsorption	7	0	7	0	7	7	0	6	6	1	0	1
Afterburner	109	0	109	0	125	125	3	58	61	7	4	11
AGOPS	3	0	3	2	5	7	2	1	3	-	-	-
Air Filter	-	-	-	-	-	-	3	0	3	-	-	-
Alkylation	-	-	-	-	-	-	-	-	-	-	-	-
Amine	-	-	-	-	-	-	-	-	-	-	-	-
Asphalt	29	7	36	4	38	42	1	55	56	13	5	18
Autoclave	1	0	1	0	1	1	0	2	2	-	-	-
Baghouse	-	-	-	-	-	-	4	0	4	-	-	-
Biofilter	-	-	-	-	-	-	-	-	-	-	-	-
Blasting	-	-	-	0	1	1	0	133	133	-	-	-
Blending	8	0	8	5	8	13	60	79	139	1	0	1
Boiler < 10 MBTU	196	0	196	203	11	214	105	4	109	8	0	8
Boiler > 50 MBTU	14	0	14	10	1	11	11	1	12	12	0	12
Boiler 10 - 50 MBTU	341	0	341	327	1	328	323	5	328	24	0	24
Bulk Load/Unload	6	0	6	0	6	6	4	12	16	0	5	5
Calcining	2	0	2	0	2	2	0	5	5	1	0	1

MBTU = 1 million British Thermal Units

Table C2-5, continued. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Short-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total
Carbon Filer	-	-	-	-	-	-	-	-	-	-	-	-
Carpet/Textiles Processing	6	0	6	2	4	6	3	4	7	-	-	-
Catalyst	1	0	1	-	-	-	0	1	1	-	-	-
Catalytic Reduction	3	0	3	2	0	2	10	0	10	1	0	1
Circuit Board Etchers	-	-	-	-	-	-	6	2	8	-	-	-
Classification	7	0	7	0	11	11	0	13	13	1	0	1
Cleaning	3	0	3	0	3	3	0	2	2	-	-	-
Coating	2	0	2	0	3	3	0	7	7	-	-	-
Coffee Roasting	2	0	2	0	8	8	0	2	2	-	-	-
Cogeneration	12	0	12	0	10	10	0	8	8	-	-	-
Collection	-	-	-	-	-	-	-	-	-	-	-	-
Composting	-	-	-	-	-	-	-	-	-	-	-	-
Condenser	-	-	-	-	-	-	4	0	4	-	-	-
Conveying	2	0	2	2	2	4	20	9	29	1	0	1
Cooling Tower	-	-	-	-	-	-	3	0	3	-	-	-
Cracking	1	0	1	0	1	1	0	1	1	0	1	1
Crematory	37	0	37	35	7	42	5	9	14	5	0	5
Cyclone	2	0	2	0	2	2	0	2	2	-	-	-
Deep Fat Fry	15	0	15	20	5	25	30	8	38	2	0	2
Degreaser	-	-	-	-	-	-	-	-	-	-	-	-
Dehydration	-	-	-	-	-	-	-	-	-	-	-	-
Desalinization	-	-	-	-	-	-	-	-	-	-	-	-
Distillation	-	-	-	-	-	-	-	-	-	-	-	-
Drop Forge	43	0	43	46	0	46	20	0	20	6	0	6

Table C2-5, continued. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Short-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total
Dry Cleaning	-	-	-	0	1	1	0	1	1	-	-	-
Dry Filter	-	-	-	-	-	-	2	1	3	-	-	-
Drying	15	0	15	8	8	16	8	11	19	1	0	1
Electrostatic Precip.	-	-	-	-	-	-	0	1	1	-	-	-
Equipment Process	43	0	43	4	35	39	5	73	78	8	0	8
Evaporator	-	-	-	0	2	2	4	0	4	-	-	-
Extruder	-	-	-	-	-	-	0	19	19	-	-	-
Flare	54	0	54	48	0	48	43	0	43	37	0	37
Flowcoater	-	-	-	0	1	1	-	-	-	-	-	-
Food Processing	5	0	5	0	8	8	11	25	36	-	-	-
Fueling	-	-	-	-	-	-	-	-	-	-	-	-
Fumigation	-	-	-	-	-	-	-	-	-	-	-	-
Garnetting	3	0	3	3	0	3	2	0	2	-	-	-
Gas Plant	-	-	-	-	-	-	-	-	-	-	-	-
Glass Manufacturing	-	-	-	-	-	-	-	-	-	-	-	-
HDS	-	-	-	-	-	-	-	-	-	-	-	-
Heater/Furnace	226	5	231	145	102	247	89	75	164	16	5	21
Hydrotreating Unit	-	-	-	-	-	-	-	-	-	-	-	-
ICE	754	1	755	502	827	1329	301	21	322	73	0	73
Incineration	1	0	1	1	1	2	0	2	2	-	-	-
Laser	-	-	-	-	-	-	4	0	4	-	-	-
Laundry Tumbler	-	-	-	1	10	11	-	-	-	-	-	-
Meat Products	-	-	-	-	-	-	1	0	1	-	-	-
Melting	2	0	2	0	2	2	2	1	3	1	0	1

Table C2-5, continued. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Short-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total
Mesh Pad	-	-	-	-	-	-	0	2	2	-	-	-
MFG	1	0	1	-	-	-	0	1	1	-	-	-
Molding	2	0	2	0	2	2	0	10	10	-	-	-
Oven	264	0	264	257	162	419	80	50	130	4	1	5
Oxidizer	29	0	29	31	0	31	14	0	14	-	-	-
Packaging	3	0	3	0	2	2	0	19	19	-	-	-
Pelletizing	-	-	-	-	-	-	0	1	1	1	0	1
Pillow Filling Machine	-	-	-	-	-	-	0	3	3	-	-	-
Plasma Arc Cutting	-	-	-	-	-	-	0	6	6	-	-	-
Plating	-	-	-	-	-	-	0	1	1	-	-	-
Printing	49	0	49	12	38	50	0	23	23	-	-	-
Production/Crushing	21	6	27	0	30	30	0	50	50	1	9	10
Railroad unloading	-	-	-	-	-	-	1	0	1	-	-	-
Reaction	6	0	6	0	5	5	0	10	10	-	-	-
Reclamation	-	-	-	0	1	1	-	-	-	-	-	-
Reduction	1	0	1	1	1	2	0	35	35	1	0	1
Research Operations	0	1	1	0	1	1	-	-	-	-	-	-
Retort	-	-	-	-	-	-	-	-	-	-	-	-
Roasting	11	0	11	0	12	12	0	6	6	-	-	-
Rubber Production	-	-	-	-	-	-	1	0	1	-	-	-
Screening	-	-	-	-	-	-	0	3	3	-	-	-
Scrubber	3	0	3	0	3	3	0	3	3	2	0	2
Semiconductor	1	0	1	-	-	-	4	1	5	1	0	1
Separation	20	0	20	0	29	29	0	8	8	2	0	2

Table C2-5, concluded. Screening Results: Number of Permits Exceeding Thresholds by Permit Category – Short-term Criteria

Permit Category	CO, including background			NOx, incremental			PM10, incremental			SOx, including background		
	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total	No Impact	Significant Impact	Total
Shredder	1	0	1	0	1	1	0	5	5	1	0	1
Sludge	1	0	1	0	5	5	0	6	6	3	0	3
Soil Treat Vapor Extract	220	0	220	0	341	341	1	25	26	7	1	8
Soldering	-	-	-	-	-	-	0	15	15	-	-	-
Spray Booth and Equipment	43	0	43	0	468	468	0	1340	1340	0	1	1
Stripping	-	-	-	0	2	2	0	2	2	-	-	-
Tail Gas Incinerator	-	-	-	0	3	3	-	-	-	-	-	-
Tanks and Storage	29	0	29	16	31	47	34	221	255	6	1	7
Tar Pot	16	0	16	1	39	40	0	74	74	7	1	8
Tire Buffer	-	-	-	-	-	-	0	11	11	-	-	-
Treating	2	0	2	1	2	3	0	1	1	-	-	-
Turbine Engine < 5 MW	40	0	40	37	0	37	3	0	3	1	0	1
Turbine Engine > 50 MW	41	1	42	2	31	33	0	54	54	40	4	44
Turbine Engine 5 - 50 MW	37	0	37	4	31	35	1	30	31	32	0	32
Vapor Recovery	3	0	3	0	3	3	0	1	1	-	-	-
Waste Water	1	0	1	0	10	10	0	4	4	1	1	2
Weigh Station	-	-	-	-	-	-	0	1	1	-	-	-
Total	2801	21	2822	1733	2512	4245	1228	2689	3917	329	39	368

MW = megawatt

a) No Impact denotes the permits for which pollutant-specific emissions did not exceed a cancer risk of 10 in a million or a chronic or acute hazard index of 1. Significant Impact denotes the permits for which pollutant-specific emissions did exceed a cancer risk of 10 in a million or a chronic or acute hazard index of 1.

Table C2-6. Number of Permits Exceeding the Operational Emission Rate Threshold by Permit Category

The operational emission rate thresholds are 550 pounds per day for carbon monoxide (CO); 55 pounds per day for nitrogen oxides (NO_x), volatile organic carbons (VOCs), and particulate matter (PM_{2.5}); and 150 pounds per day for sulfur oxides (SO_x) and particulate matter (PM₁₀).

Permit Category	CO	NO _x	PM ₁₀	PM _{2.5}	SO _x	VOC
Turbine Engine > 50 MW	11	18	16	29	0	17
Spray Booth and Equipment	0	1	0	2	0	13
Internal Combustion Engine	5	29	0	2	0	11
Bulk Load/Unload	0	1	0	0	0	10
Flare	4	13	3	9	4	9
Printing	0	0	0	0	0	6
Tanks and Storage	0	0	0	0	0	5
Turbine Engine 5 – 50 MW	0	18	0	6	0	4
Asphalt	0	4	0	2	0	4
Heater/Furnace	1	6	1	7	1	2
Alkylation	0	0	0	0	0	2
Shredder	0	0	0	0	0	2
Oven	0	1	0	0	0	2
Boiler > 50 MBTU	1	4	1	2	0	1
Blending	0	0	0	0	0	1
Coating	0	0	0	0	0	1
Composting	0	0	0	0	0	1
Cooling Tower	0	0	0	0	0	1
Hydrotreating Unit	0	0	0	0	0	1
Oxidizer	0	0	0	0	0	1
Separation	0	0	0	0	0	1
Treating	0	0	0	0	0	1
Waste Water	0	0	0	0	0	1
Agriculture Opertions	0	0	0	0	0	1
Blasting	0	0	0	3	0	0
Calcining	0	0	0	1	0	0
Cracking	1	1	1	1	1	0
Molding	0	1	0	1	0	0
Boiler 10 – 50 MBTU	0	2	0	1	0	0
Production/Crushing	0	3	0	1	0	0
Equipment Process	0	1	0	0	0	0
Reduction	0	1	0	0	0	0
Vapor Recovery	0	1	0	0	0	0
Afterburner	0	7	0	0	0	0
Boiler < 10 MBTU	0	0	0	0	0	0
Activated Carbon Adsorber	0	0	0	0	0	0
Adhesives	0	0	0	0	0	0

MW = Megawatt, MBTU = 1 million British Thermal Units

Table C2-6, continued. Number of Permits Exceeding the Operational Emission Rate Threshold by Permit Category

Permit Category	CO	NO_x	PM10	PM2.5	SO_x	VOC
Adsorption	0	0	0	0	0	0
Air Filter	0	0	0	0	0	0
Amine	0	0	0	0	0	0
Autoclave	0	0	0	0	0	0
Baghouse	0	0	0	0	0	0
Biofilter	0	0	0	0	0	0
Carbon Filter	0	0	0	0	0	0
Carpet/Textiles Processing	0	0	0	0	0	0
Catalyst	0	0	0	0	0	0
Catalytic Reduction	0	0	0	0	0	0
Circuit Board Etchers	0	0	0	0	0	0
Classification	0	0	0	0	0	0
Cleaning	0	0	0	0	0	0
Coffee Roasting	0	0	0	0	0	0
Cogeneration	0	0	0	0	0	0
Collection	0	0	0	0	0	0
Condenser	0	0	0	0	0	0
Conveying	0	0	0	0	0	0
Crematory	0	0	0	0	0	0
Cyclone	0	0	0	0	0	0
Deep Fat Fry	0	0	0	0	0	0
Degreaser	0	0	0	0	0	0
Dehydration	0	0	0	0	0	0
Deposition	0	0	0	0	0	0
Desalinzation	0	0	0	0	0	0
Distillation	0	0	0	0	0	0
Drop Forge	0	0	0	0	0	0
Dry Cleaning	0	0	0	0	0	0
Dry Filter	0	0	0	0	0	0
Drying	0	0	0	0	0	0
Electrostatic Precip.	0	0	0	0	0	0
Evaporator	0	0	0	0	0	0
Extruder	0	0	0	0	0	0
Flowcoater	0	0	0	0	0	0
Food Processing	0	0	0	0	0	0
Fractionation	0	0	0	0	0	0
Fueling	0	0	0	0	0	0
Fumigation	0	0	0	0	0	0
Garnetting	0	0	0	0	0	0
Gas Plant	0	0	0	0	0	0

Table C2-6, concluded. Number of Permits Exceeding the Operational Emission Rate Threshold by Permit Category

Permit Category	CO	NO _x	PM10	PM2.5	SO _x	VOC
Glass Manufacturing	0	0	0	0	0	0
Hydrodesulfurization	0	0	0	0	0	0
Incineration	0	0	0	0	0	0
Isomerization Unit	0	0	0	0	0	0
Laser	0	0	0	0	0	0
Laundry Tumbler	0	0	0	0	0	0
Meat Products	0	0	0	0	0	0
Melting	0	0	0	0	0	0
Mesh Pad	0	0	0	0	0	0
Manufacturing	0	0	0	0	0	0
Mist Control	0	0	0	0	0	0
Odor Control	0	0	0	0	0	0
Packaging	0	0	0	0	0	0
Pelletizing	0	0	0	0	0	0
Pillow Filling Machine	0	0	0	0	0	0
Plasma Arc Cutting	0	0	0	0	0	0
Plating	0	0	0	0	0	0
Railroad unloading	0	0	0	0	0	0
Reaction	0	0	0	0	0	0
Reclamation	0	0	0	0	0	0
Research Operations	0	0	0	0	0	0
Retort	0	0	0	0	0	0
Roasting	0	0	0	0	0	0
Rubber Production	0	0	0	0	0	0
Screening	0	0	0	0	0	0
Scrubber	0	0	0	0	0	0
Semiconductor	0	0	0	0	0	0
Sludge	0	0	0	0	0	0
Soil Treat Vapor Extract	0	0	0	0	0	0
Soldering	0	0	0	0	0	0
Stripping	0	0	0	0	0	0
Tail Gas Incinerator	0	0	0	0	0	0
Tar Pot	0	0	0	0	0	0
Tire Buffer	0	0	0	0	0	0
Turbine Engine < 5 MW	0	0	0	0	0	0
Weigh Station	0	0	0	0	0	0

MW = Megawatt

Appendix C3: Meteorological Zone Analysis

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Development of Meteorological Zones for Dispersion Modeling of Emissions from Individual Facilities

Refined air dispersion modeling of pollutants from representative facilities requires hourly meteorological data. This data includes key meteorological parameters such as hourly average of wind speed, wind direction, and measures of atmospheric stability that together determine the ambient concentration of air pollutants from permitted facilities at a given receptor location. The unique geographic and topographic features of the South Coast Air Basin (SCAB) cause a significant variation in meteorological conditions between various parts of the basin, which in turn lead to varying levels of air quality and health impacts from permitted facilities depending on the location of the facilities. Since it is expected that a large number of dispersion modeling runs will be required to determine ambient air quality impacts from representative facilities of permitted categories selected for refined modeling, it is not feasible to apply all possible variations of meteorological conditions that occur in the SCAB. Therefore the approach taken in this study was to identify a limited number of zones with similar meteorological characteristics and select representative locations within the zones. Furthermore, since there is no particular location associated with representative facilities, so that these facilities could potentially be installed anywhere in the basin, the choice of locations for the meteorological data should be made conservatively in order to calculate the impacts that are likely to be highest. This section presents the analysis conducted to determine boundaries of meteorological zones, to determine which of these zones is most conducive to high ambient concentrations, and to select representative meteorological stations within those zones for conducting refined air dispersion modeling.

Description and Processing of Meteorological Data

Two meteorological datasets were obtained from the South Coast AQMD. The first dataset was the output of the MM5 prognostic meteorological model that was developed by the AQMD for the year 2005. This gridded meteorological data was incorporated into various air quality modeling studies by the AQMD, including demonstrating the attainment of federal 8-hour ozone and PM_{2.5} standards.

The MM5 modeling domain encompasses the SCAB and surrounding areas at a 5x5 km horizontal grid resolution. The vertical structure of MM5 domain consists of 30 layers defined in a terrain-following sigma coordinate system based on a normalized pressure index (σ levels), and extends up to 15,000 m above ground level (AGL). For each grid location, the MM5 dataset contains hourly values of all meteorological variables required for the refined local scale air quality modeling. These include horizontal and vertical components of wind, temperature, sensitive heat flux, and frictional velocity. As proposed in the protocol, the MM5 data was utilized to evaluate the variability of meteorological conditions in the basin and define appropriate zones for refined air quality modeling. In order to perform this analysis, ICF Jones and Stokes developed a set of customized tools to extract meteorological variables of interest from large binary MM5 output datasets. Since the MM5 data is reported on a staggered grid, where vector variables are computed on the edges of the grid cell and scalar variables at the center of grid cells, necessary interpolation was performed in order to obtain all meteorological parameters at the center of the grid cell.

The second dataset is comprised of AERMOD-ready meteorological files, covering three years, at 25 monitoring locations in the SCAB. This data was recently developed for the SCAQMD using the hourly meteorological observations from the years 2005 – 2007 and is intended to facilitate the district's permitting process. Although the MM5 data are being used in the parallel cumulative portion of this

study, based on the discussions with the SCAQMD staff, it was decided to use the AERMOD-ready observational data to conduct the refined air dispersion modeling because these data cover a three-year period and therefore can better represent long-term meteorological conditions. In addition, this is the dataset that will be used in the future permitting assessments that are the subject of the analysis.

Variability of Meteorology in the SCAB

The topography of the SCAB region is defined by San Gabriel and San Bernardino Mountains on the North, and by the San Jacinto Mountains on the east. The mountains on the perimeter of the basin encompass a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the west. These topographic features have significant bearing on the transport of pollutants in the region and leads to a wide range of air quality concentrations. In addition, the geographic extent of the region – 300 km from West to East and 150 km from South to North – results in natural variability in meteorological conditions.

The variability in dispersion characteristics of air pollutants from permitted facilities in SCAB can be quantified by analyzing the variability in meteorological parameters across the basin. Wind speed and atmospheric stability play a major role in determining how an emitted material is dispersed. High wind speed results in atmospheric transport of pollutant to a greater distance and leads to lower ambient concentrations near the emission source. Conversely, lower wind speed leads to generally high ambient concentrations in the areas in close proximity to the emission source.

Atmospheric stability is a measure of resistance to the vertical motion of air parcels in the atmosphere. Stability can be broadly classified as stable, neutral and unstable. Stable atmospheric conditions restrict the vertical movement of air parcels thus creating conditions conducive for the accumulation of pollutants near the surface. Unstable atmospheric conditions accelerate the vertical movement of air parcels and promote the dispersion of pollutants. At neutral conditions, the dispersion of pollutants depends mostly on the wind speed. Therefore, geographic variation in atmospheric stability characteristics will lead to variability in dispersion characteristics. Historically, stability has been characterized into six stability classes, A – F where A is most unstable and F is stable, based on the criteria developed by Pasquill in 1961. This classification is based on surface wind speed, incident solar radiation and cloud cover. However, more recently the stability parameter recognized as most appropriate for the surface layer is the Monin-Obukhov length (L), where L is the ratio of the rate of production of the turbulence by shear to the rate of production of turbulence by buoyancy and is calculated as:

$$L = -\rho c_p T u_*^3 / k g H$$

where T is ambient temperature in Kelvin (K),
ρ is the density of dry air (kg/m³),
u_{*} is the surface friction velocity,
c_p is the specific heat capacity of dry air (J/kg/K),
k is the von Karman constant (0.4),
g is the acceleration due to gravity (m/s²), and
H is the sensitive heat flux (W/m²).

To account for any tall stacks at permitted facilities that may extend beyond the lowest layer, for each grid cell wind speeds in the 6 lowest vertical layers and up to 0.96 σ were extracted from the MM5 data and averaged for every hour. The 6 lowest layers typically cover the first 310 m above the ground

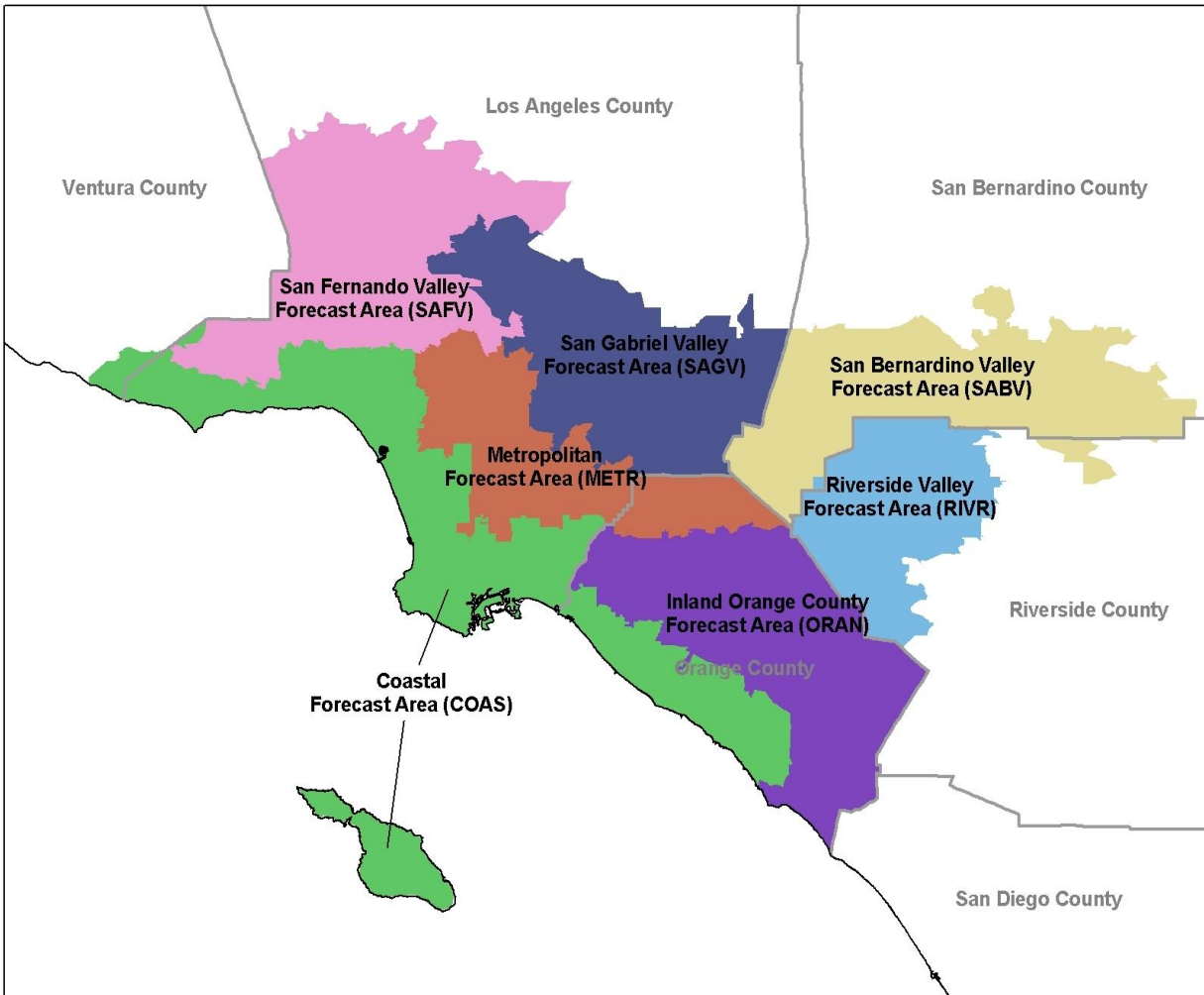
level. All other parameters needed for the determining the Monin-Obukhov length are also extracted from MM5 data for each grid cell.

Since L is a continuous function, discrete stability bins are required to conduct the analysis. Golder (1972) provides a relationship between atmospheric stability class and Monin-Obukhov length as a function of surface roughness length. This relationship was used to derive the seven Pasquill-Gifford-Turner (PGT) stability classes for each grid cell at every hour. PGT stability classes range from 1 to 7 with the following interpretation: Extremely Unstable (1), Unstable (2), Slightly Unstable (3), Neutral (4), Slightly Stable (5), Stable (6), and Extremely Stable (7). Surface roughness length was obtained from the AERMOD-ready meteorological data files.

The geographic variability of wind speed and atmospheric stability in the SCAB was first analyzed using the SCAQMD's classification of the SCAB into air quality forecast areas. The SCAB is divided into fourteen general forecast areas in order to inform the general public of air quality conditions. Figure C3-1 shows a map of all forecast areas in the district. The delimitation of these forecast areas is based on air transport features in the valley, political and postal boundaries. If the variability is sufficiently minimal across these areas, representative meteorological zones may be developed by aggregating the forecast areas. For this analysis, seven forecast areas were considered: Coastal (COAS), Metropolitan (METR), San Fernando Valley (SAFV), San Gabriel Valley (SAGV), Inland Orange (ORAN), Riverside Valley (RIVR), and San Bernardino Valley (SABV). These seven forecast areas are regions in the basin where the vast majority of the population in the District resides and most of the permits are issued.

Tables C3-1 and C3-2 show the variation in wind speed among the seven forecast areas based on analysis of the MM5 data for each of the four seasonal periods – Spring (March – May), Summer (June – August), Fall (September – November) and Winter (December – February). The highest wind speeds are predicted in the north of the basin throughout the year while inland areas experience the lowest. Higher wind speeds are generally predicted to occur during the winter, while summertime has lower wind speeds. Correspondingly, the variation in wind speeds among forecast areas is higher during winter than rest of the year. However, the lower quartile wind speed shows significant variation among forecast areas throughout the year and is likely to lead to wide variation in the air quality impacts. Similarly, median wind speeds also vary considerably among the forecast areas. Table C3-3 shows the distribution of atmospheric stability conditions for each of the forecast areas. While the forecast areas that are inland (RIVR, SABV) have high fractions of hours with stable atmospheric conditions, coastal forecast areas (COAS, METR, and ORAN) generally experience high fractions of hours with unstable atmospheric conditions, likely due to the onshore wind from the Pacific Ocean.

Figure C3-1. The Seven Air Quality Forecast Areas of the South Coast Air Basin Included in this Analysis.



**Table C3-1. Wind Speed Statistics for Grid Cells
within SCAQMD Forecast Areas**

Forecast Area	Mean	SD	Min	Max
Spring				
COAS	4.26	2.80	0.01	24.39
SAFV	5.19	3.68	0.02	30.90
METR	3.36	2.09	0.01	18.95
ORAN	3.55	2.68	0.00	29.81
SAGV	3.32	2.57	0.01	30.29
SABV	3.66	2.92	0.00	25.39
RIVR	3.91	2.98	0.00	23.93
Summer				
COAS	3.24	1.97	0.01	15.02
SAFV	3.24	1.94	0.00	18.21
METR	2.81	1.66	0.01	11.88
ORAN	2.65	1.57	0.00	11.71
SAGV	2.63	1.63	0.01	16.94
SABV	3.04	2.12	0.00	14.12
RIVR	2.91	2.29	0.00	11.82
Fall				
COAS	3.49	2.78	0.00	27.33
SAFV	5.39	4.76	0.00	31.11
METR	2.71	1.91	0.01	17.36
ORAN	3.68	3.68	0.01	28.95
SAGV	2.99	2.98	0.00	30.42
SABV	3.67	3.77	0.01	31.62
RIVR	3.83	3.47	0.00	25.15
Winter				
COAS	4.23	3.22	0.01	26.90
SAFV	6.71	4.97	0.01	32.85
METR	3.28	2.29	0.00	17.66
ORAN	4.80	4.11	0.01	27.57
SAGV	3.64	3.45	0.01	32.52
SABV	4.32	4.08	0.01	27.18
RIVR	4.57	3.72	0.02	23.20

**Table C3-2. Distribution of Wind Speed for Grid Cells
within SCAQMD Forecast Areas**

Forecast Area	5%	25%	50%	75%	95%
Spring					
COAS	0.76	2.16	3.79	5.67	9.57
SAFV	0.86	2.53	4.35	6.97	12.31
METR	0.61	1.71	3.02	4.73	7.13
ORAN	0.60	1.71	3.05	4.69	8.00
SAGV	0.62	1.59	2.73	4.38	7.55
SABV	0.59	1.54	2.82	5.11	8.79
RIVR	0.50	1.51	3.21	5.79	9.04
Summer					
COAS	0.61	1.65	3.01	4.51	6.76
SAFV	0.67	1.79	3.01	4.32	6.60
METR	0.54	1.39	2.58	4.15	5.57
ORAN	0.52	1.35	2.45	3.74	5.43
SAGV	0.54	1.35	2.32	3.68	5.56
SABV	0.52	1.34	2.43	4.44	7.17
RIVR	0.36	1.01	2.09	4.66	7.29
Fall					
COAS	0.55	1.60	2.90	4.54	8.63
SAFV	0.67	1.96	3.75	7.35	15.52
METR	0.44	1.29	2.32	3.77	5.90
ORAN	0.51	1.39	2.57	4.36	11.88
SAGV	0.51	1.29	2.21	3.64	8.03
SABV	0.49	1.29	2.38	4.62	12.06
RIVR	0.42	1.26	2.69	5.48	11.09
Winter					
COAS	0.73	1.95	3.35	5.62	10.65
SAFV	0.91	2.73	5.43	9.73	16.54
METR	0.57	1.58	2.73	4.47	7.72
ORAN	0.65	1.76	3.38	6.77	13.29
SAGV	0.55	1.42	2.53	4.65	10.35
SABV	0.56	1.52	2.85	5.74	13.51
RIVR	0.55	1.70	3.49	6.47	12.31

**Table C3-3: Percentage of Hours for Each Pasquill-Gifford-Turner
Atmospheric Stability Class for Grid Cells within SCAQMD
Forecast Areas**

Forecast Area	PGT Atmospheric Stability Class						
	1	2	3	4	5	6	7
COAS	9.28	23.82	21.95	17.97	4.05	7.49	15.44
SAFV	2.73	22.18	19.20	19.37	5.14	9.05	22.33
METR	9.98	23.91	23.78	14.52	2.72	5.26	19.84
ORAN	6.10	28.11	16.75	13.77	2.47	6.01	26.78
SAGV	4.60	24.24	22.10	14.06	2.95	6.73	25.32
SABV	5.75	26.79	16.83	14.49	2.94	6.64	26.56
RIVR	4.29	23.31	16.66	16.37	4.01	6.65	28.71
Summer							
COAS	12.50	29.90	23.27	7.70	2.23	5.77	18.62
SAFV	4.37	32.90	16.37	4.82	1.64	5.20	34.70
METR	16.03	25.50	29.50	6.55	1.78	4.99	15.65
ORAN	9.73	35.34	15.79	5.18	1.42	4.74	27.81
SAGV	7.34	28.19	23.60	7.29	1.75	5.72	26.11
SABV	5.71	27.71	17.44	10.57	2.26	6.41	29.90
RIVR	7.68	25.72	16.03	10.40	2.70	5.89	31.56
Fall							
COAS	10.93	25.18	15.77	10.55	3.80	7.99	25.78
SAFV	4.02	18.78	10.80	18.41	7.26	10.26	30.47
METR	12.68	25.53	16.37	8.50	2.08	5.53	29.31
ORAN	7.75	25.61	10.79	10.54	3.72	7.99	33.60
SAGV	5.94	22.34	14.51	10.15	3.77	7.30	35.99
SABV	6.69	21.70	10.19	11.74	3.89	8.20	37.59
RIVR	5.82	21.16	10.50	11.93	4.71	8.27	37.60
Winter							
COAS	8.27	19.85	12.78	22.39	5.01	8.78	22.92
SAFV	2.04	12.67	10.48	34.28	8.85	11.56	20.11
METR	7.69	20.11	10.93	20.78	3.33	6.20	30.96
ORAN	4.87	17.34	8.66	22.77	6.31	10.04	30.00
SAGV	3.11	17.56	11.62	21.29	4.58	7.64	34.20
SABV	4.57	16.96	9.41	19.43	5.02	9.29	35.31
RIVR	3.69	15.81	9.83	18.17	7.10	10.14	35.25

In order to quantify the degree of similarity or dissimilarity of meteorological parameters among the forecast areas in the SCAB, the ICF Jones and Stokes calculated the joint frequency distribution of wind speed and stability class for each grid cell and also for each forecast area.¹ For this analysis it was assumed that dispersion characteristics at hours that are within a given stability class *and* wind speed bin combination are similar. For example, all hours with stable atmospheric conditions and wind speeds in the lowest quartile – often occurring during the nighttime – are expected to result in high ambient concentrations from emitted sources. At the other extreme, meteorological conditions at hours with unstable atmospheric conditions and wind speeds in the highest quartile result in rapid dispersion of the emitted plume. Similarly, other stability class and wind speed combinations are assumed to aggregate hours with common dispersion characteristics. Therefore, the similarity in dispersion characteristics between any two grid cells can be quantified by calculating the vector distance between the joint frequency distribution vectors.

Stability classes were aggregated into the following three categories for the purposes of calculating joint frequency distribution vectors:

- Unstable (PGT classes 1, 2 and 3),
- Neutral (PGT class 4) and
- Stable (PGT classes 5, 6, and 7).

Wind speed was distributed into four bins with cut-off value based on the quantiles of wind speed distribution of the whole domain. Therefore, the joint frequency distribution vector consisted of 12 elements – i.e. 12 wind speed and stability class combinations.

In order to compare the similarity or dissimilarity among forecast areas, the joint frequency vector is calculated for each season after aggregating the wind speed and stability data for all hours and all grid cells within each of the forecast areas. In addition, the joint frequency vector is also calculated for all grid cells within the entire domain under the analysis – i.e., all grid cells in the seven forecast areas. Table C3-4 shows the vector distances² between forecast area pairs for each of the season. The larger the distance, the higher is the dissimilarity between the two forecast areas in dispersion characteristics. As expected, there is significant dissimilarity between the inland forecast areas (RIVR and SABV) and coastal forecast areas (COAS). This trend is observed for all seasons.

The variability within the forecast areas is also analyzed using a similar approach. However, in this case, the joint frequency vectors for each grid cell are calculated and the distances between all grid cell pairs within each of the forecast areas are analyzed. Since this similarity metric is interpreted in a relative sense, the distances between grid cell pairs for the entire domain are also calculated for the comparison purposes. It can reasonably be assumed that the variability in a given forecast area is significant if the vector distance metrics for that particular forecast area are comparable to that of the entire domain. Table C3-5 shows the median and 95th percentile of vector distances between grid cell pairs within each of the forecast areas. The Metropolitan (METR) forecast area has least variability while the Coastal (COAS), San Bernardino Valley (SABV), and San Gabriel Valley (SAGV) areas show high

¹ Since the variance of a proportion depends upon the proportion, the joint frequency distribution vector is transformed using the arcsine transformation to stabilize the variance. Thus if p is the proportion of hours in a given bin, then transform p to $f(p) = \arcsin(\sqrt{p})$, except for $p = 0$ or 1 where $f(0) = \arcsin(\sqrt{1/2n})$ and $f(1) = \arcsin(\sqrt{1-1/2n})$, based on n hourly values. The variance of the transformed frequency distribution is approximately independent of p , although it will depend on n . The transformed values will also tend to be more closely approximated by the normal distribution.

² The vector distance is calculated as the chi-squared distance. To compare two grid cells, for each of the 12 wind speed and stability class bins, compute the proportions of hours in that bin, p_1 and p_2 . Also compute N , the total number of hours in that bin summed over all grid cells. The chi-square distance is the square root of the sum of $(p_1 - p_2)^2 / N$, summed over all 12 bins. Dividing by N stabilizes the variance by accounting for the fact that the more frequent bins have higher variances. A similar calculation applies when comparing two forecast areas.

variability that is comparable to that of the entire domain. This trend is generally consistent across all the seasons, although higher variability is generally observed during the Winter season.

Since the analysis of dispersion characteristics within the forecast areas suggested that the variability is significant, an alternative approach – cluster analysis – was used to re-group the MM5 grid cells into zones with similar meteorological conditions that are more closely matched and is described in the following section.

Table C3-4. Variability of Meteorological Parameters Between Forecast Areas. The Vector Distance Between The Joint Distributions of Pairs of Forecast Areas.

Forecast Area	COAS	SAFV	METR	ORAN	SAGV	SABV	RIVR
Spring							
COAS	0.00	0.09	0.11	0.15	0.20	0.17	0.17
SAFV	0.09	0.00	0.31	0.26	0.34	0.21	0.15
METR	0.11	0.31	0.00	0.06	0.06	0.13	0.19
ORAN	0.15	0.26	0.06	0.00	0.02	0.05	0.11
SAGV	0.20	0.34	0.06	0.02	0.00	0.06	0.14
SABV	0.17	0.21	0.13	0.05	0.06	0.00	0.04
RIVR	0.17	0.15	0.19	0.11	0.14	0.04	0.00
Summer							
COAS	0.00	0.14	0.13	0.14	0.20	0.19	0.29
SAFV	0.14	0.00	0.33	0.15	0.24	0.21	0.34
METR	0.13	0.33	0.00	0.10	0.11	0.31	0.41
ORAN	0.14	0.15	0.10	0.00	0.04	0.18	0.30
SAGV	0.20	0.24	0.11	0.04	0.00	0.17	0.31
SABV	0.19	0.21	0.31	0.18	0.17	0.00	0.07
RIVR	0.29	0.34	0.41	0.30	0.31	0.07	0.00
Fall							
COAS	0.00	0.19	0.07	0.07	0.18	0.16	0.17
SAFV	0.19	0.00	0.39	0.16	0.32	0.15	0.10
METR	0.07	0.39	0.00	0.09	0.10	0.17	0.24
ORAN	0.07	0.16	0.09	0.00	0.05	0.03	0.07
SAGV	0.18	0.32	0.10	0.05	0.00	0.05	0.17
SABV	0.16	0.15	0.17	0.03	0.05	0.00	0.04
RIVR	0.17	0.10	0.24	0.07	0.17	0.04	0.00
Winter							
COAS	0.00	0.18	0.12	0.09	0.24	0.15	0.14
SAFV	0.18	0.00	0.41	0.15	0.45	0.27	0.18
METR	0.12	0.41	0.00	0.11	0.06	0.10	0.19
ORAN	0.09	0.15	0.11	0.00	0.12	0.03	0.03
SAGV	0.24	0.45	0.06	0.12	0.00	0.05	0.20
SABV	0.15	0.27	0.10	0.03	0.05	0.00	0.05
RIVR	0.14	0.18	0.19	0.03	0.20	0.05	0.00

Table C3-5. Variability of meteorological parameters within forecast areas. The distribution of vector distance between the joint distributions of wind speed and stability of all gridcell pairs within each forecast area and the domain.

Season	COAS	SAFV	METR	ORAN	SAGV	SABV	RIVR	DOMAIN
Spring								
Median	0.24	0.23	0.05	0.23	0.26	0.29	0.15	0.32
95th Percentile	0.88	0.69	0.15	0.56	0.65	0.69	0.45	0.93
Summer								
Median	0.26	0.30	0.12	0.37	0.54	0.42	0.29	0.51
95th Percentile	0.77	0.86	0.29	0.95	1.23	1.40	0.91	1.21
Fall								
Median	0.21	0.26	0.07	0.22	0.31	0.36	0.16	0.37
95th Percentile	0.65	0.71	0.28	0.54	0.99	0.76	0.41	0.99
Winter								
Median	0.29	0.31	0.07	0.22	0.25	0.35	0.20	0.39
95th Percentile	1.35	0.99	0.52	0.63	0.94	0.90	0.59	1.27

Development of Meteorological Zones Using Hierarchical Clustering Approach

Hierarchical clustering is a statistical technique to divide a set of objects into groups with similar properties based on a similarity metric. In order to obtain regions with similar meteorological features from the perspective of pollutant dispersion, a hierarchical clustering method is applied to develop clusters of grid cells using the MM5 meteorological data. Although several meteorological parameters determine the dispersion properties of the air pollutants and resulting ambient concentrations, wind speed and atmospheric stability play a dominant role.

For clustering analysis, a vector of the arc sine-transformed joint frequency distribution of wind speed and stability class was calculated for each grid cell based on the hourly data as described above. Like the similarity analysis for the forecast areas described above, it was assumed that dispersion characteristics at hours that are within a given stability class and wind speed bin combination are similar. The cluster analysis was used to generate zones that have similar meteorological dispersion characteristics by combining grid cells in such a way as to minimize the difference between the arc sine-transformed joint frequency distribution vectors within each zone.

Hierarchical clustering is a group of techniques that proceed through a sequence of steps and are broadly divided into agglomerative or divisive methods. In agglomerative methods, which are most widely used clustering techniques, initially all data points are individual clusters in themselves. In subsequent steps, “nearby” clusters are joined, where distances are defined using the similarity metric, and the various clustering schemes differ on how the similarity is defined between two clusters. In divisive methods, all data points are initially in one cluster and are separated into finer groupings in the subsequent steps. For this analysis, Ward’s agglomerative scheme was used and the distance between two grid cells was defined as the Euclidean distance between the vectors of the arc-sine transformed joint distribution of wind speed and atmospheric stability class. The resulting clusters of grid cells are considered as meteorological zones with similar dispersion characteristics.

Figure C3-2 shows the grid cells grouped into seven meteorological zones. The locations of meteorological stations are also shown (the numerical labels correspond to those in Table C3-6). The largest zone includes most of the Los Angeles County and includes several meteorological stations. Most of the inland grid cells also form a meteorological zone. The smallest zone contains only six grid cells and does not include any meteorological station. Although a large fraction of grid cells in a given zone are geographically contiguous, a small number of grid cells from various zones are distributed throughout the basin. This is attributed to the complex topography of the region which plays a significant role in determining the wind speed. Note that only the grid cells that are inside the seven forecast areas previously specified are included in the clustering analysis. Consequently, some SCAQMD meteorological stations are outside the seven meteorological zones. Table C3-6 contains the location of meteorological stations in the basin and identifies their respective zones.

Figure C3-2. Grid Cells in Seven Meteorological Zones Obtained Using Hierarchical Clustering of Meteorological Data.

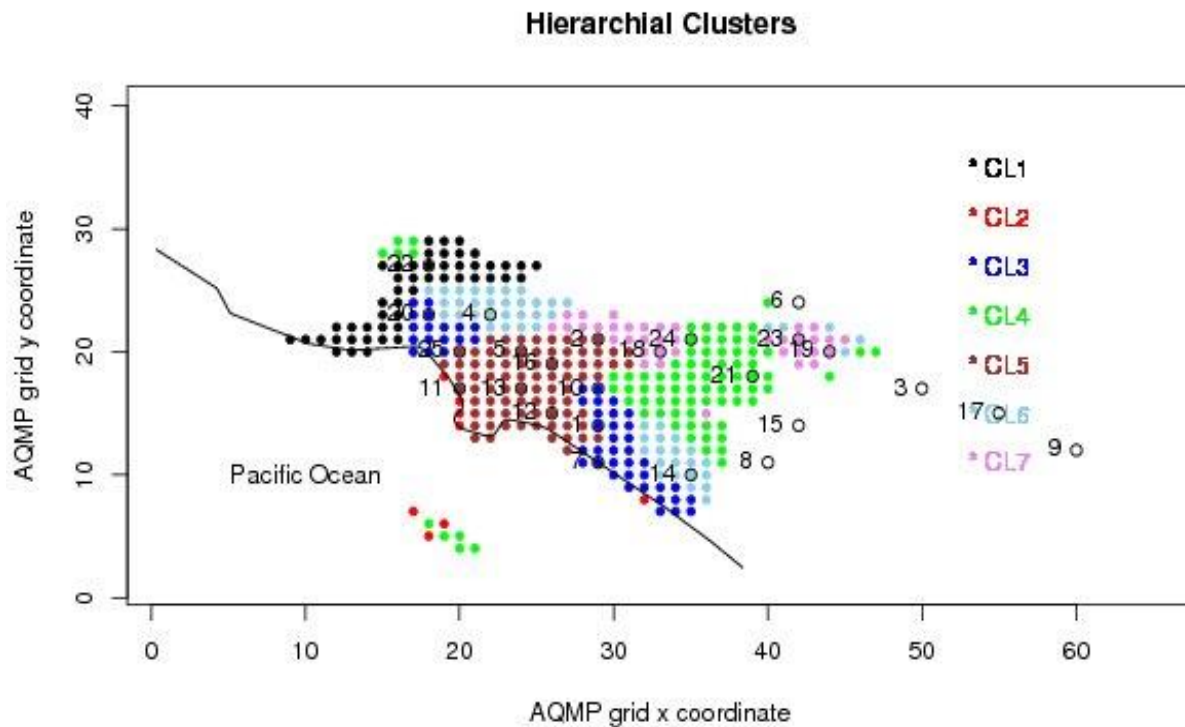


Table C3-6. Location of Stations with AERMOD-ready Meteorological Data

No.	Meteorological Station	Meteorological Cluster	Forecast Area ¹	Latitude	Longitude
1	ANAH	3	4	33° 49' 50"	117° 56' 19"
2	AZUS	5	5	34° 8' 11"	117° 55' 26"
3	BNAP ²	-	-	33° 55' 15"	116° 51' 30"
4	BURK	6	2	34° 10' 33"	118° 19' 1"
5	CELA	5	3	34° 3' 59"	118° 13' 36"
6	CRES ²	-	-	34° 14' 29"	117° 16' 32"
7	CSTA	3	1	33° 40' 26"	117° 55' 33"
8	ELSI ²	-	-	33° 40' 35"	117° 19' 51"
9	INDI ²	-	-	33° 42' 30"	116° 12' 57"
10	LAHB	3	3	33° 55' 31"	117° 57' 8"
11	LAXH	5	1	33° 57' 15"	118° 25' 49"
12	LGBH	5	1	33° 49' 25"	118° 11' 19"
13	LYNN	5	3	33° 55' 44"	118° 12' 39"
14	MSVJ	6	4	33° 37' 49"	117° 40' 30"
15	PERI ²	-	-	33° 47' 20"	117° 13' 40"
16	PICO	5	4	34° 00' 37"	118° 4' 7"
17	PLSP ²	-	-	33° 51' 10"	116° 32' 28"
18	POMA	7	5	34° 4' 0"	117° 45' 0"
19	RDLA	7	6	34° 3' 32"	117° 8' 52"
20	RESE	3	2	34° 11' 57"	118° 31' 58"
21	RIVR	4	7	34° 0' 2"	117° 24' 55"
22	SCLR	1	2	34° 23' 0"	118° 31' 42"
23	SNBO	7	6	34° 6' 24"	117° 16' 25"
24	UPLA	4	6	34° 6' 14"	117° 37' 45"
25	WSLA	5	1	34° 3' 2"	118° 27' 24"

¹ Forecast areas are labeled as follows: Coastal (1), San Fernando Valley (2), Metropolitan (3), Inland Orange (4), San Gabriel Valley (5), San Bernardino Valley (6) and Riverside Valley (7).

² Station outside the area of clustering analysis.

Selection of Meteorological Cluster Zones and Representative Meteorological Stations

The meteorological zones that are most conducive to higher ground-level ambient concentrations were determined based on AERMOD simulations using the AERMOD-ready data for the meteorological stations within each cluster zone. In addition to meteorology, stack parameters also have significant influence on ambient concentrations resulting from a given emission source. Therefore, AERMOD simulations were performed using the data from each SCAQMD meteorological station combined with two sets of representative stack parameters.

- 1) Stack parameter set I: elevated stack
- 2) Stack parameter set II: low-level stack

A uniform emissions profile was assumed for the stacks and resulting maximum 24-hour averaged concentrations are analyzed in order select the meteorological stations for the refined air quality modeling.

The results are summarized in Table C3-7. Figures C3-3 and C3-4 show the maximum 24-hour average ambient concentrations for each meteorological station grouped according to the meteorological cluster group and forecast area, respectively, for representative stack I. Similarly, Figures C3-5 and C3-6 show the maximum 24-hour average ambient concentrations obtained using the representative stack II. In both cases the results show that concentrations vary more widely within the forecast areas than within the meteorological cluster groups ..

Examination of Table C3-7 and Figures C3-3 and C3-5 suggest that the meteorological cluster zones with the most adverse meteorological conditions are likely to be zones 3, 5, and 6.

The meteorological stations selected to be representative of these zones were as follows:

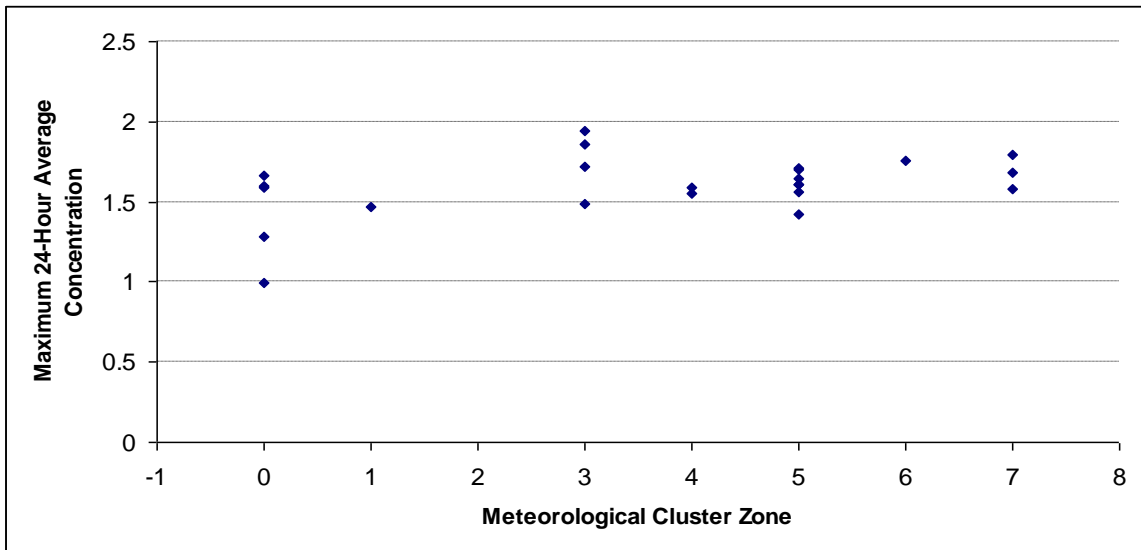
Cluster zone 3 – La Habra (LAHB) in Orange County
Cluster zone 5 –Azusa (AZUS) in Los Angeles County, and
Cluster zone 6 – Burbank (BURK) in Los Angeles County.

Table C3-7. 24-hour Maximum Concentrations Using Data from All Meteorological Stations in the SCAB for Two Sets of Stack Parameters

Meteorological Station	Meteorological Zone	Ambient Concentration from Elevated Stack	Ambient Concentration from Low-Level Stack
Santa Clarita (SCLR)	1	1.47	6.41
Anaheim (ANAH)	3	1.95	9.57
La Habra (LAHB)	3	1.86	9.90
Costa Mesa (CSTA)	3	1.72	12.18
Reseda (RESE)	3	1.49	6.77
Riverside (RIVR)	4	1.59	6.91
Upland (UPLA)	4	1.55	8.03
West LA (WSLA)	5	1.71	9.99
Azusa (AZUS)	5	1.70	8.36
Lynwood (LYNN)	5	1.64	8.38
LAX (LAXH)	5	1.61	7.56
Pico Rivera (PICO)	5	1.61	7.53
Central LA (CELA)	5	1.57	7.62
Long Beach (LGHB)	5	1.42	7.39
Burbank (BURK)	6	1.76	8.57
San Bernardino (SNBO)	7	1.79	8.14
Pomona (POMA)	7	1.68	7.39
Redlands (RDLD)*	7	1.58	9.06
Crestline (CRES)	0	1.66	8.32
Indio (INDI)	0	1.60	7.22
Banning Airport (BNAP)	0	1.59	6.94
Lake Elsinore (ELSI)	0	1.28	7.55
Perris (PERI)	0	0.99	5.52

* Data available only for the year 2007.

Figure C3-3. AERMOD Concentration Predictions by Meteorological Zones for Representative Stack Parameters I (Cluster group 0 includes areas outside of the 7 forecast areas included in this study.)



Cluster 7 has RDL station which has data only for the year 2007.

Figure C3-4. AERMOD Concentration Predictions by Forecast Areas for Representative Stack Parameters I (Forecast area 0 includes areas outside of the 7 forecast areas included in this study.)

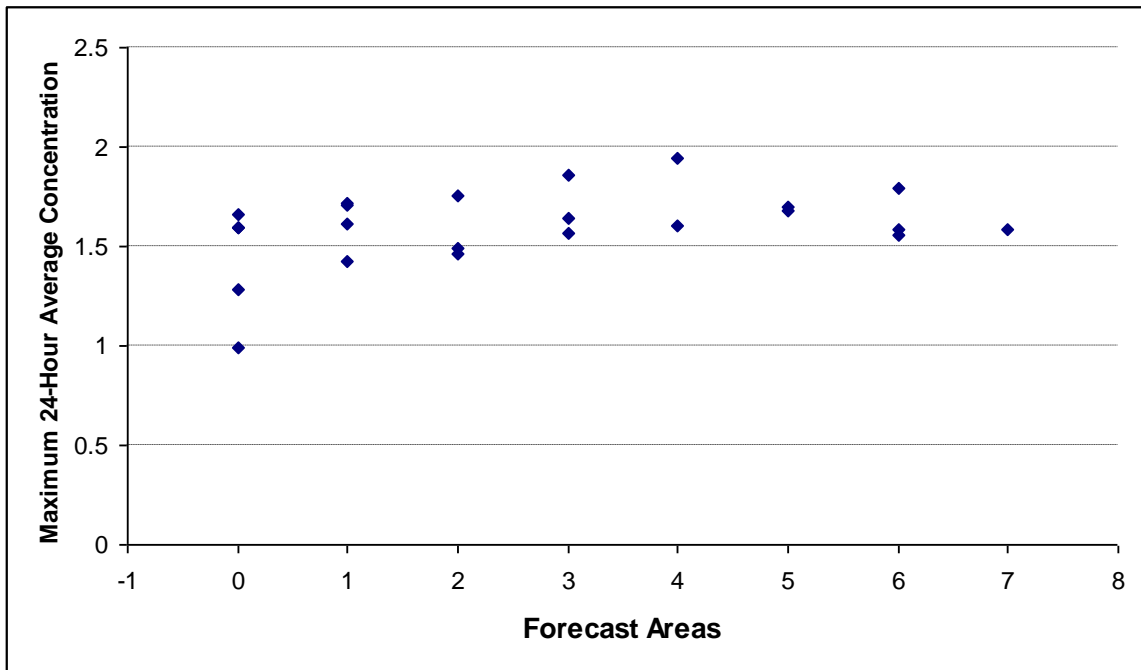
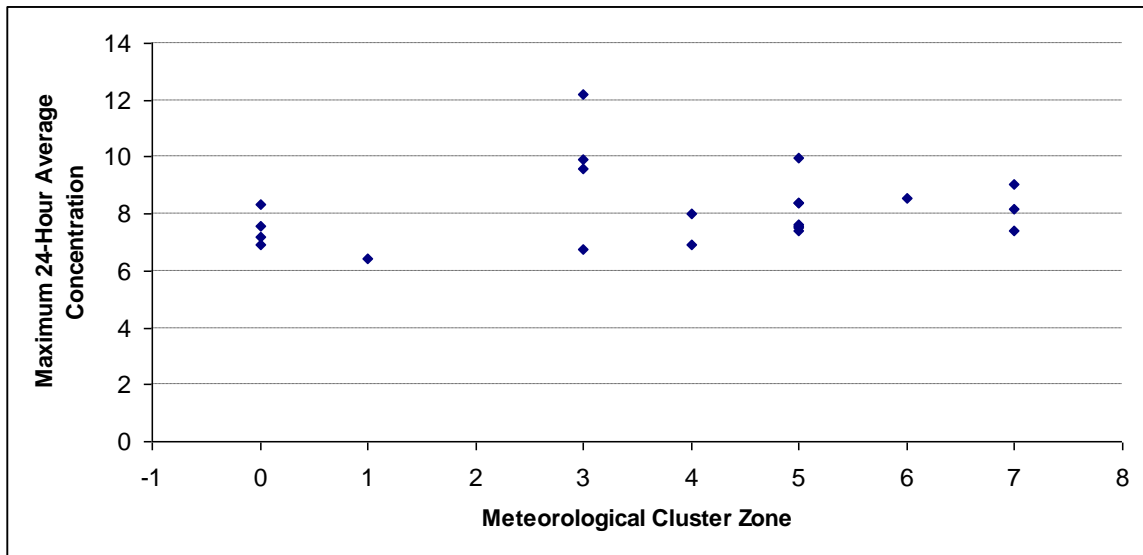
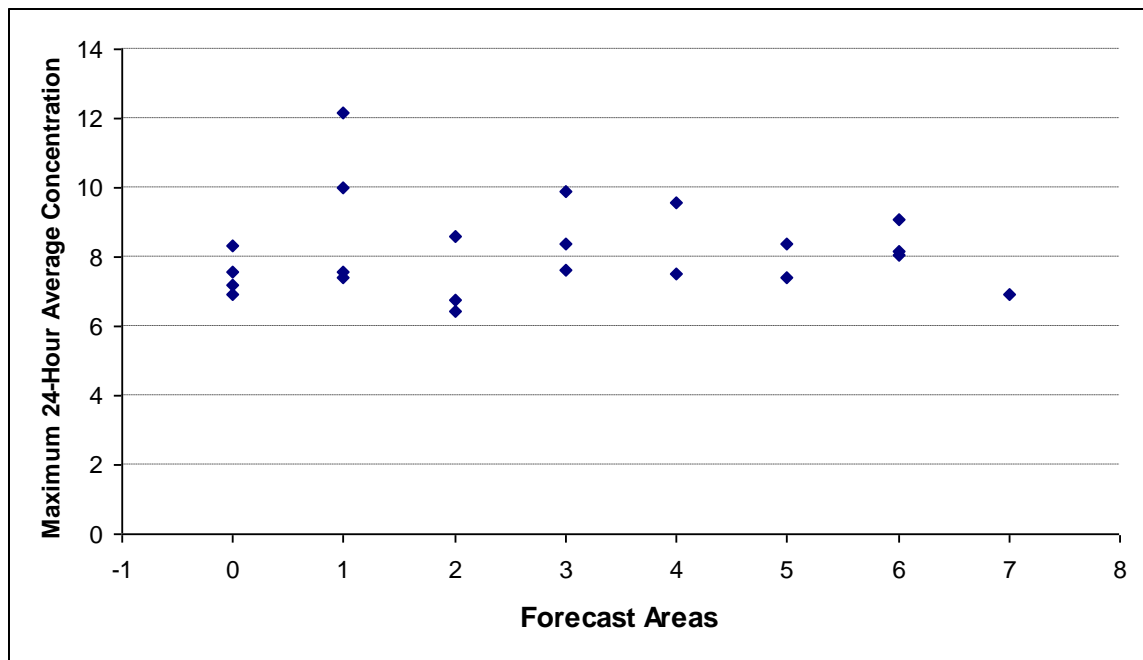


Figure C3-5. AERMOD Concentration Predictions by Meteorological Zones for Representative Stack Parameters II (Cluster group 0 includes areas outside of the 7 forecast areas included in this study.)



Cluster 7 has RDL D station which has data only for the year 2007.

Figure C3-6. AERMOD Concentration Predictions by Meteorological Zones for Representative Stack Parameters II (Forecast area 0 includes areas outside of the 7 forecast areas included in this study.)



Appendix C4: Refined (AERMOD) Assessment: Supporting Information

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Appendix C4: Refined (AERMOD) Assessment

Permits Selected for Refined Analysis

Table C4-1. Permits Used to Develop Representative Sources for Refined Assessment

Pollutant	Permit Category	50 th percentile permit no.	95 th percentile permit no.	Source for Stack Parameters ^a
NOx	Spray Booth and Equipment	452684	454789	NEI SCC default
	Heater/Furnace	442209	456866	Calculated median from NEI for 50 th % ^{ile} emissions; NEI SCC default for 95 th % ^{ile} emissions
	Tar Pot	427420	423001	NEI SCC default
	Equipment Process	464917	464377	NEI SCC default
	Afterburner	469715	427701	NEI SCC default
	Asphalt	457292	441464	NEI SCC default
	Internal Combustion Engine	431201	482675	Calculated median from NEI
	Soil Treat Vapor Extract	423125	486814	NEI SCC default
	Oven	424691	411673	NEI SCC default
	Printing	428943	460267	NEI SCC default
PM10	Spray Booth and Equipment	420860	450407	NEI SCC default
	Heater/Furnace	391136	436005	NEI SCC default
	Tar Pot	420977	427102	NEI SCC default
	Tanks and Storage	491630	452463	NEI SCC default
	Blasting	485237	483505	NEI SCC default
	Equipment Process	442519	429902	NEI SCC default
	Blending	448642	425396	Calculated median from NEI
	Turbine Engine > 50 MW	450895	416169	Calculated median from NEI
	Afterburner	395421	457854	NEI SCC default
	Asphalt	475391	441464	NEI SCC default

MW = Megawatt

- a) “NEI SCC default” indicates that the SCC-specific default stack parameters developed by USEPA for NEI were used. “Calculated median from NEI” indicates that typical stack parameters were calculated as a part of the current analysis by estimating the median exposure concentration from available SCC-specific NEI records and using the corresponding stack parameter values. Unless otherwise specified, the same stack parameters were used for the assessment of 50th and 95th percentile emissions estimates for the listed permit categories.

Operating Schedules for Refined Analysis

Table C4-2. Operating Schedules Used in AERMOD Analysis.

Operating Schedule	Weeks/Year	Days/Week	Hour/Day	AERMOD Type	Assumptions
Scenario 1	52	7	24	HROFDY	12am-12pm
Scenario 2	52	6	10	SHRDOW	Mo-Sa, 8am-6pm
Scenario 3	52	5	18	SHRDOW	Mo-Fr, 6am-12pm
Scenario 5	52	5	24	SHRDOW	Mo-Fr, 12am-12pm
Scenario 8	52	7	12	HROFDY	8am-8pm
Scenario 9	52	4	4	SHRDOW7	Mo-Th 9am-1pm
Scenario 10	52	5	10	SHRDOW	Mo-Fr, 8am - 6pm
Scenario 11	52	6	12	SHRDOW	Mo-Sa, 8am-8pm
Scenario 12	50	5	8	SHRDOW	Mo-Fr, 9am-5pm
Scenario 14	45	4	8	MHRDOW7	Jan - Nov, Mo-Th, 9am-5pm
Scenario 15	52	5	6	SHRDOW	Mo-Fr, 9-3pm
Scenario 16	52	7	18	HROFDY	6am-12pm
Scenario 20	19	7	10	MHRDOW	Jan-May, Mo-Su, 8am-6pm
Scenario 21	24	3	8	MHRDOW7	Jan-Jun, Mo-We, 9am-5pm
Scenario 22	40	2	8	MHRDOW7	Jan-Oct, Mo-Tu, 9am-5pm
Scenario 24	45	5	10	MHRDOW	Jan-Nov, Mo-Fr, 8am-6pm
Scenario 25	52	1	8	SHRDOW7	Mo, 9am-5pm
Scenario 27	52	7	8	HROFDY	9am-5pm
Scenario 28	52	5	5	SHRDOW	Mo-Fr, 9am-2pm
Scenario 29	52	6	8	SHRDOW	Mo-Sa, 9am-5pm
Scenario 30	30	7	16	MHRDOW	Jan-Jul, Mo-Su, 8am-12pm
Scenario 31	52	6	4	SHRDOW	Mo-Sa, 9am-1pm
Scenario 32	52	7	16	HROFDY	8am-12am
Scenario 33	12	6	8	MHRDOW7	Jan-Mar Mo-Sat 9am-5pm
Scenario 34	52	7	20	HROFDY	4am-12am
Scenario 36	52	5	16	SHRDOW	Mo-Fri, 8am-12pm
Scenario 37	52	5	12	SHRDOW	Mo-Fri - 8am-8pm
Scenario 38	52	5	17	SHRDOW	MO-Fri - 7am-12pm
Scenario 39	52	7	6	HROFDY	9am-3pm
Scenario 40	52	7	15	HROFDY	8am-10pm
Scenario 41	26	2	4	MHRDOW7	Jan-Jun, Mo-Tu, 8am-12pm

AERMOD Refined Analysis Results

Table C4-3. AERMOD Maximum 24-Hour Concentrations at Selected Meteorological Stations by Year – PM2.5

Permit Category	Percentile	PM2.5 Max Concentrations - 24-hour (µg/m ³)									Threshold 24-hour (µg/m ³)
		2005			2006			2007			
		AZUS	BURK	LAHB	AZUS	BURK	LAHB	AZUS	BURK	LAHB	
Spray Booth and Equipment	50th	1.24	1.18	1.67	1.22	1.41	1.42	1.15	1.37	1.25	2.5
Heater/Furnace	50th	0.41	0.44	0.37	0.59	0.58	0.39	0.33	0.34	0.34	2.5
Tar Pot	50th	8.47	7.46	12.48	8.32	7.89	8.57	9.22	8.77	11.76	2.5
Tanks and Storage	50th	2.20	2.52	2.50	2.21	2.53	2.21	2.34	2.20	2.26	2.5
Blasting	50th	3.57	3.39	4.33	3.52	3.49	4.05	3.33	3.70	3.71	2.5
Equipment Process	50th	3.03	2.85	3.65	3.16	2.94	3.23	3.21	3.00	2.97	2.5
Blending	50th	0.46	0.40	0.65	0.47	0.36	0.67	0.44	0.43	0.78	2.5
Turbine Engine > 50 MW	50th	0.95	1.02	0.87	1.08	0.90	0.83	0.80	0.89	0.92	2.5
Afterburner	50th	0.08	0.07	0.06	0.14	0.12	0.07	0.06	0.07	0.07	2.5
Asphalt	50th	1.00	0.93	1.05	1.13	1.02	0.90	0.91	0.89	0.96	2.5
Spray Booth and Equipment	95th	3.59	3.38	3.28	3.30	3.50	3.64	3.03	2.91	3.23	2.5
Heater/Furnace	95th	0.66	0.62	0.60	1.06	0.92	0.61	0.50	0.55	0.50	2.5
Tar Pot	95th	102.92	110.11	215.92	95.58	107.12	117.61	112.43	83.72	122.45	2.5
Tanks and Storage	95th	1.75	1.65	1.67	1.62	1.72	1.80	1.46	1.41	1.57	2.5
Blasting	95th	43.18	49.85	52.17	47.88	56.82	51.77	45.70	50.94	45.65	2.5
Equipment Process	95th	1.71	1.79	1.51	2.76	2.57	1.58	1.40	1.44	1.38	2.5
Blending	95th	0.23	0.21	0.23	0.21	0.22	0.23	0.19	0.19	0.19	2.5
Turbine Engine > 50 MW	95th	2.36	2.64	2.13	3.84	2.94	2.31	1.99	2.13	2.19	2.5
Afterburner	95th	0.63	0.59	0.52	1.13	0.96	0.56	0.49	0.53	0.52	2.5
Asphalt	95th	4.05	3.74	3.58	4.56	4.53	3.91	3.14	3.41	4.03	2.5

MW = Megawatt

Monitoring station identifier codes: AZUS = Azusa, BURK = Burbank, LAHB = La Habra (all located in the South Coast Air Basin, California)

a) Those values exceeding the SCAQMD localized significant threshold noted in bold

Table C4-4. AERMOD Maximum Annual Concentrations at Selected Meteorological Stations by Year – PM2.5

Permit Category	Percentile	PM2.5 Max Concentrations - Annual (µg/m3)									Threshold Annual (µg/m3)
		2005			2006			2007			
		AZUS	BURK	LAHB	AZUS	BURK	LAHB	AZUS	BURK	LAHB	
Spray Booth and Equipment	50th	0.46	0.33	0.47	0.43	0.31	0.46	0.38	0.29	0.43	1
Heater/Furnace	50th	0.13	0.09	0.11	0.12	0.08	0.11	0.11	0.08	0.11	1
Tar Pot	50th	0.07	0.06	0.06	0.06	0.06	0.07	0.05	0.05	0.07	1
Tanks and Storage	50th	0.75	0.74	0.82	0.68	0.69	0.78	0.58	0.64	0.71	1
Blasting	50th	0.03	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	1
Equipment Process	50th	1.32	0.97	1.33	1.26	0.89	1.32	1.12	0.87	1.20	1
Blending	50th	0.17	0.15	0.25	0.17	0.14	0.26	0.15	0.14	0.24	1
Turbine Engine > 50 MW	50th	0.22	0.13	0.20	0.21	0.13	0.20	0.20	0.13	0.18	1
Afterburner	50th	0.03	0.02	0.02	0.03	0.02	0.02	0.02	0.02	0.02	1
Asphalt	50th	0.27	0.22	0.24	0.23	0.21	0.23	0.21	0.19	0.22	1
Spray Booth and Equipment	95th	1.17	0.76	1.00	1.10	0.70	0.99	0.98	0.67	0.94	1
Heater/Furnace	95th	0.25	0.15	0.21	0.23	0.14	0.21	0.20	0.14	0.19	1
Tar Pot	95th	0.35	0.22	0.35	0.27	0.22	0.32	0.27	0.21	0.29	1
Tanks and Storage	95th	0.56	0.37	0.51	0.52	0.34	0.51	0.47	0.33	0.48	1
Blasting	95th	0.10	0.10	0.11	0.09	0.11	0.11	0.08	0.10	0.09	1
Equipment Process	95th	0.70	0.47	0.60	0.65	0.43	0.60	0.58	0.42	0.54	1
Blending	95th	0.10	0.06	0.08	0.09	0.05	0.08	0.08	0.05	0.08	1
Turbine Engine > 50 MW	95th	0.91	0.53	0.80	0.81	0.49	0.77	0.75	0.50	0.73	1
Afterburner	95th	0.23	0.15	0.20	0.21	0.14	0.20	0.19	0.14	0.18	1
Asphalt	95th	1.32	0.84	1.12	1.19	0.79	1.10	1.08	0.77	1.05	1

MW = Megawatt

Monitoring station identifier codes: AZUS = Azusa, BURK = Burbank, LAHB = La Habra (all located in the South Coast Air Basin, California)

a) Those values exceeding the SCAQMD localized significant threshold noted in bold

Table C4-5. AERMOD Maximum 1-Hour Concentrations at Selected Meteorological Stations by Year – NO₂

Permit Category	Percentile	1-hour Maximum Concentrations (µg/m ³)									Threshold 1-hour (µg/m ³)
		2005			2006			2007			
		AZUS	BURK	LAHB	AZUS	BURK	LAHB	AZUS	BURK	LAHB	
Spray Booth and Equipment	50th	5.62	5.73	4.02	5.66	4.63	5.86	6.68	4.05	4.09	338
Heater/Furnace	50th	3.06	3.61	2.23	3.33	3.36	2.92	3.48	2.82	3.06	338
Tar Pot	50th	18.26	9.01	6.73	13.88	9.79	11.10	15.72	6.76	6.17	338
Equipment Process	50th	90.51	72.61	53.24	91.58	67.47	76.40	97.88	55.52	54.76	338
Afterburner	50th	1.02	1.21	1.03	1.24	1.15	1.07	1.09	1.09	1.08	338
Asphalt	50th	12.44	13.92	12.98	13.77	13.19	12.47	12.16	12.87	15.23	338
Internal Combustion Engine	50th	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	338
Soil Treat Vapor Extract	50th	11.88	8.79	40.25	11.76	8.87	43.44	11.79	28.05	45.85	338
Oven	50th	6.63	6.19	4.23	7.01	5.64	5.77	6.93	4.49	4.24	338
Printing	50th	13.76	14.70	9.43	14.95	12.01	12.73	13.77	9.96	9.40	338
Spray Booth and Equipment	95th	4.39	5.55	3.62	4.93	5.26	4.15	4.84	3.96	4.02	338
Heater/Furnace	95th	4.22	4.27	4.42	4.59	4.81	4.26	3.75	4.43	4.35	338
Tar Pot	95th	45.65	17.62	14.14	39.58	24.48	14.18	25.91	14.88	13.56	338
Equipment Process	95th	43.40	55.58	36.59	48.70	51.08	40.70	46.92	42.82	43.79	338
Afterburner	95th	10.90	12.85	11.04	13.18	12.24	11.46	11.64	11.63	11.53	338
Asphalt	95th	12.54	14.02	13.08	13.88	13.95	12.63	12.25	13.37	15.34	338
Internal Combustion Engine	95th	0.18	0.20	0.19	0.22	0.21	0.19	0.19	0.20	0.18	338
Soil Treat Vapor Extract	95th	23.76	17.59	80.50	23.52	17.73	86.89	23.59	56.10	91.71	338
Oven	95th	26.41	29.83	26.87	30.19	29.76	27.37	27.13	27.64	27.82	338
Printing	95th	5.73	6.90	4.94	6.32	6.63	5.29	6.24	5.16	5.34	338

Monitoring station identifier codes: AZUS = Azusa, BURK = Burbank, LAHB = La Habra (all located in the South Coast Air Basin, California)

a) Those values exceeding the SCAQMD localized significant threshold noted in bold

Table C4-6. AERMOD Maximum 1-Hour Background Concentrations at Selected Meteorological Stations by Year – NO₂

1-hour Background Concentrations (µg/m ³)											
Permit Category	Percentile	2005			2010			2030			Threshold 1-hour (µg/m ³)
		AZUS	BURK	LAHB	AZUS	BURK	LAHB	AZUS	BURK	LAHB	
Spray Booth and Equipment	50th	229.76	193.58	210.06	211.76	181.56	194.56	152.83	142.71	193.83	338
Heater/Furnace	50th	226.57	191.46	207.26	208.57	179.44	191.76	149.64	140.59	191.03	338
Tar Pot	50th	241.34	197.65	215.30	223.34	185.62	199.80	164.42	146.77	199.06	338
Equipment Process	50th	320.96	260.47	280.60	302.96	248.44	265.10	244.03	209.59	264.36	338
Afterburner	50th	224.32	189.06	205.28	206.32	177.03	189.78	147.39	138.18	189.04	338
Asphalt	50th	236.85	201.77	219.43	218.86	189.75	203.93	159.93	150.90	203.19	338
Internal Combustion Engine	50th	223.10	187.87	204.22	205.10	175.85	188.72	146.18	137.00	187.98	338
Soil Treat Vapor Extract	50th	234.96	215.90	250.05	216.96	203.88	234.55	158.03	165.03	233.81	338
Oven	50th	230.09	194.05	209.97	212.09	182.02	194.47	153.16	143.17	193.73	338
Printing	50th	238.03	202.56	216.93	220.03	190.53	201.43	161.10	151.68	200.69	338
Spray Booth and Equipment	95th	228.01	193.41	208.34	210.01	181.38	192.84	151.08	142.53	192.11	338
Heater/Furnace	95th	227.67	192.66	208.62	209.67	180.64	193.12	150.74	141.79	192.38	338
Tar Pot	95th	268.73	212.33	218.38	250.74	200.31	202.88	191.81	161.46	202.15	338
Equipment Process	95th	271.78	243.43	247.99	253.78	231.41	232.49	194.85	192.56	231.75	338
Afterburner	95th	236.26	200.71	215.73	218.26	188.68	200.23	159.33	149.83	199.49	338
Asphalt	95th	236.96	201.87	219.54	218.96	189.85	204.04	160.03	151.00	203.30	338
Internal Combustion Engine	95th	223.30	188.06	204.38	205.30	176.04	188.89	146.38	137.19	188.15	338
Soil Treat Vapor Extract	95th	246.84	243.95	295.91	228.84	231.92	280.41	169.91	193.08	279.67	338
Oven	95th	253.27	217.68	232.02	235.27	205.66	216.52	176.34	166.81	215.79	338
Printing	95th	229.40	194.75	209.54	211.40	182.73	194.04	152.47	143.88	193.30	338

Monitoring station identifier codes: AZUS = Azusa, BURK = Burbank, LAHB = La Habra (all located in the South Coast Air Basin, California)

a) Those values exceeding the SCAQMD localized significant threshold noted in bold

Table C4-7. AERMOD Maximum Annual Concentrations at Selected Meteorological Stations by Year – NO₂

Permit Category	Percentile	Annual Maximum Concentrations (µg/m ³)									Threshold Annual (µg/m ³)
		2005			2006			2007			
		AZUS	BURK	LAHB	AZUS	BURK	LAHB	AZUS	BURK	LAHB	
Spray Booth and Equipment	50th	0.13	0.09	0.12	0.13	0.09	0.13	0.13	0.09	0.12	56
Heater/Furnace	50th	0.17	0.10	0.13	0.16	0.10	0.13	0.14	0.10	0.12	56
Tar Pot	50th	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	56
Equipment Process	50th	2.47	1.62	2.18	2.39	1.63	2.23	2.19	1.55	2.09	56
Afterburner	50th	0.08	0.04	0.07	0.07	0.04	0.07	0.07	0.04	0.07	56
Asphalt	50th	0.52	0.29	0.46	0.49	0.30	0.46	0.45	0.28	0.45	56
Internal Combustion Engine	50th	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	56
Soil Treat Vapor Extract	50th	0.96	0.84	0.87	0.94	0.79	0.89	0.94	0.83	0.86	56
Oven	50th	0.17	0.11	0.15	0.17	0.12	0.15	0.16	0.11	0.15	56
Printing	50th	0.36	0.23	0.30	0.36	0.25	0.31	0.34	0.23	0.31	56
Spray Booth and Equipment	95th	0.20	0.12	0.16	0.19	0.12	0.16	0.17	0.11	0.15	56
Heater/Furnace	95th	0.40	0.23	0.37	0.37	0.22	0.37	0.33	0.20	0.33	56
Tar Pot	95th	0.02	0.02	0.02	0.02	0.01	0.02	0.02	0.01	0.02	56
Equipment Process	95th	2.58	1.44	1.91	2.43	1.44	1.93	2.17	1.35	1.75	56
Afterburner	95th	0.85	0.47	0.78	0.80	0.46	0.77	0.70	0.43	0.70	56
Asphalt	95th	0.92	0.51	0.80	0.86	0.51	0.79	0.78	0.47	0.74	56
Internal Combustion Engine	95th	0.02	0.01	0.02	0.02	0.01	0.02	0.02	0.01	0.02	56
Soil Treat Vapor Extract	95th	1.91	1.68	1.75	1.88	1.59	1.79	1.88	1.66	1.72	56
Oven	95th	2.13	1.19	2.01	1.99	1.17	1.96	1.76	1.09	1.80	56
Printing	95th	0.34	0.19	0.25	0.32	0.19	0.25	0.28	0.18	0.23	56

Monitoring station identifier codes: AZUS = Azusa, BURK = Burbank, LAHB = La Habra (all located in the South Coast Air Basin, California)

a) Those values exceeding the SCAQMD localized significant threshold noted in bold

Table C4-8. AERMOD Maximum Annual Concentrations Plus Maximum Annual Background Concentrations at Selected Meteorological Stations by Year – NO₂

Max Concentration (2005-2007) + Annual Background Concentrations(µg/m3)											Threshold Annual (µg/m3)
Permit Category	Percentile	2005			2010			2030			
		AZUS	BURK	LAHB	AZUS	BURK	LAHB	AZUS	BURK	LAHB	
Spray Booth and Equipment	50th	57.7	58.4	42.6	49.1	50.0	34.8	25.6	66.0	23.4	56
Heater/Furnace	50th	57.7	58.4	42.6	49.1	50.0	34.8	25.6	66.0	23.4	56
Tar Pot	50th	57.5	58.4	42.4	49.0	49.9	34.7	25.4	66.0	23.3	56
Equipment Process	50th	60.0	60.0	44.7	51.4	51.5	36.9	27.9	67.6	25.5	56
Afterburner	50th	57.6	58.4	42.5	49.0	49.9	34.7	25.5	66.0	23.4	56
Asphalt	50th	58.1	58.6	42.9	49.5	50.2	35.1	25.9	66.2	23.8	56
Internal Combustion Engine	50th	57.5	58.3	42.4	48.9	49.9	34.6	25.4	65.9	23.3	56
Soil Treat Vapor Extract	50th	58.5	59.2	43.3	49.9	50.7	35.5	26.4	66.8	24.2	56
Oven	50th	57.7	58.5	42.6	49.1	50.0	34.8	25.6	66.1	23.4	56
Printing	50th	57.9	58.6	42.8	49.3	50.1	35.0	25.8	66.2	23.6	56
Spray Booth and Equipment	95th	57.7	58.5	42.6	49.1	50.0	34.8	25.6	66.1	23.5	56
Heater/Furnace	95th	57.9	58.6	42.8	49.4	50.1	35.0	25.8	66.2	23.7	56
Tar Pot	95th	57.6	58.4	42.5	49.0	49.9	34.7	25.4	66.0	23.3	56
Equipment Process	95th	60.1	59.8	44.4	51.5	51.3	36.6	28.0	67.4	25.2	56
Afterburner	95th	58.4	58.8	43.2	49.8	50.3	35.4	26.3	66.4	24.1	56
Asphalt	95th	58.5	58.9	43.2	49.9	50.4	35.4	26.3	66.5	24.1	56
Internal Combustion Engine	95th	57.6	58.4	42.5	49.0	49.9	34.7	25.4	66.0	23.3	56
Soil Treat Vapor Extract	95th	59.5	60.0	44.2	50.9	51.5	36.4	27.3	67.6	25.1	56
Oven	95th	59.7	59.5	44.4	51.1	51.1	36.7	27.6	67.1	25.3	56
Printing	95th	57.9	58.5	42.7	49.3	50.1	34.9	25.8	66.1	23.5	56

Monitoring station identifier codes: AZUS = Azusa, BURK = Burbank, LAHB = La Habra (all located in the South Coast Air Basin, California)

a) Those values exceeding the SCAQMD localized significant threshold noted in bold

Table C4-9. Stack Parameters for AERMOD Refined Assessment

Permit Category	Pollutant	%-ile	Stack Height (m)	Stack Diameter (m)	Exit Velocity (m/s)	Exit Temp (K)	Fence-line (m)	Emissions (g/s)
Spray Booth and Equipment	PM	50th	9.14	0.50	6.94	295.93	50	2.20E-02
		95th	10.57	0.59	10.65	327.05	50	1.03E-01
	NOx	50th	9.14	0.50	6.94	295.93	50	2.20E-02
		95th	10.57	0.59	10.65	327.05	50	4.72E-02
Tanks and Storage	PM	50th	8.73	0.48	7.96	307.55	50	7.35E-02
		95th	15.12	0.54	8.58	349.72	50	7.26E-02
		95th	15.12	0.54	8.58	349.72	50	4.85E-08
Blasting	PM	50th	6.28	0.55	10.73	299.23	50	6.61E-02
		95th	8.03	0.52	9.64	298.29	50	1.87E+00
Blending	PM	50th	13.31	0.25	7.47	295.37	50	5.25E-03
		95th	21.34	0.61	15.85	394.26	50	2.52E-02
Heater/Furnace	PM	50th	10.47	0.48	4.92	369.31	50	7.35E-03
		95th	15.54	0.69	17.35	533.15	50	7.35E-02
	NOx	50th	10.47	0.48	4.92	369.31	50	2.10E-02
		95th	15.54	0.69	17.35	533.15	50	1.89E-01
Equipment Process	PM	50th	8.20	0.36	5.26	301.96	50	2.94E-02
		95th	10.62	0.63	9.99	335.58	50	4.72E-02
	NOx	50th	8.20	0.36	5.26	301.96	50	2.20E-01
		95th	10.62	0.63	9.99	335.58	50	5.14E-01
Tar Pot	PM	50th	10.06	0.10	0.11	523.15	10	1.10E-01
		95th	10.06	0.10	0.11	523.15	10	9.92E-01
	NOx	50th	10.06	0.10	0.11	523.15	10	2.20E-02
		95th	10.06	0.10	0.11	523.15	10	5.51E-02
Afterburner	PM	50th	12.88	0.76	8.88	575.74	50	5.25E-03
		95th	12.88	0.76	8.88	575.74	50	4.20E-02
	NOx	50th	12.88	0.76	8.88	575.74	50	3.15E-02
		95th	12.88	0.76	8.88	575.74	50	3.36E-01
Asphalt	PM	50th	9.94	1.03	10.71	523.15	50	1.76E-01
		95th	9.94	1.03	10.71	523.15	50	3.97E-01
	NOx	50th	9.94	1.03	10.71	523.15	50	4.96E-01
		95th	9.94	1.03	10.71	523.15	50	5.00E-01
Turbine Engine > 50 MW	PM	50th	19.35	2.65	12.68	615.37	50	7.32E-01
		95th	19.35	2.65	12.68	615.37	50	1.73E+00
ICE	NOx	50th	17.47	3.49	18.82	662.98	50	1.05E-02
		95th	17.47	3.49	18.82	662.98	50	1.15E-01
Soil Treat Vapor Extract	NOx	50th	3.66	0.08	8.80	296.32	50	1.05E-02
		95th	3.66	0.08	8.80	296.32	50	2.10E-02
Oven	NOx	50th	8.01	0.37	5.30	327.99	50	2.20E-02
		95th	17.44	0.74	9.45	534.51	50	2.16E-01
Printing	NOx	50th	9.45	0.29	6.89	386.48	50	6.61E-02
		95th	9.50	0.50	7.52	397.61	50	5.25E-02

APPENDIX D

GREENHOUSE GAS EMISSIONS ANALYSIS

INTRODUCTION

This document describes the methods used to estimate greenhouse gas (GHG) emissions associated with implementation of the South Coast Air Quality Management District (SCAQMD) Proposed Rule 1315 program. The granting of offsets to a permit applicant under Proposed Rule 1315 would result, after the permittee's facility begins operation, in emissions occurring that would not have occurred in the absence of the use of offsets. This methodology explains how the GHG emissions that would be associated with the offset usage were estimated. There are four evaluations to this appendix: 1) direct GHG impacts from the proposed project (starting in year 2010); 2) the cumulative GHG impacts from the proposed project (starting in year 2007); 3) the GHG impacts from the power plants eligible for offsets under legislation; and 4) the total cumulative GHG impacts from the proposed project and power plants.

DIRECT GHG IMPACTS FROM PROPOSED PROJECT

The GHG emissions analysis for the proposed project, as described in Chapter 2, is based on Basin-wide 2002 source category emissions data from the 2007 AQMP that includes sources seeking exemptions from federal offset requirements or Priority Reserve credits through either Rule 1304 or 1309.1. Offsets used to demonstrate equivalency with federal offset requirements would be tracked pursuant to PR 1315. Basin wide year 2002 GHG emissions were calculated as part of the 2007 AQMP. The GHG pollutants that were included in the AQMP calculations were carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Emissions of these pollutants were reported as CO₂ equivalent based on the global warming potentials (GWP) used by CARB in its AB32 scoping plan. The GHG analysis for the proposed project includes all six pollutants including CO₂, CH₄, and N₂O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF₆).

For purpose of this analysis, GHG (CO₂, CH₄, and N₂O) emissions and their corresponding criteria pollutant emissions were extracted from the 2007 AQMP basin wide inventory for R1304 and R1309.1-related source categories only. Affected source categories include fuel combustion (e.g., electric utilities, petroleum refining, food and agricultural processing, etc.), waste disposal (e.g., landfills, sewage treatment, etc.), cleaning and surface coatings (e.g., printing, degreasing, etc.), and industrial processes (e.g., chemical, mineral and metal processes, electronics, etc.) The inventory for the combustion sources was based on fuel-use data and the inventory for the non-combustion sources was based on the methane emissions from the total organic gases (TOG) inventory and CARB profiles. The 2007 AQMP CO₂, CH₄, and N₂O emissions inventory from both combustion and non-combustion sources are shown in Table D-1. According to the 2007 AQMP, the CO₂, CH₄, and N₂O emissions from all affected major source categories totaled 72 million MT per year. In order to calculate the GHG emissions from the proposed project without

specific knowledge of the affected equipment types, sizes, operation activity, ratings, load factors, etc., a ratio was derived to correlate criteria pollutants to CO₂, CH₄, and N₂O emissions using the latest 2007 AQMP emissions data (see Table D-1). In order to determine the share of total GHGs represented by stationary source emissions from the industry categories eligible for permits under Rules 1309.1 and 1304, staff determined the share of total AQMP stationary source combustion emissions of SO_x that is represented by SO_x emissions from the relevant industry categories. SO_x emissions were selected as a surrogate to prorate the CO₂, CH₄, and N₂O emissions because SO_x emissions result primarily from sulfur contained in fossil fuels. The primary fuel used for stationary source combustion in the South Coast region is natural gas. To a much smaller extent diesel fuel is used by emergency backup engines used during periodic engine testing and maintenance and when there is a power outage. For both fuel types, the control levels for SO_x between existing equipment and the new equipment (PR1315 users) are the same. Therefore, SO_x provides a more direct linkage than other pollutants to estimate the corresponding CO₂, CH₄, and N₂O emissions. Total SO_x emissions from all affected major source categories are 931 tons per year. Table D-1 provides a list of the affected source categories, CO₂, CH₄, and N₂O emissions, CO₂e emissions and corresponding SO_x emissions from the 2007 AQMP.

TABLE D-1

CO₂, CH₄, and N₂O Emissions from 2007 AQMP for R1304 and R1309.1 Sources and Corresponding SO_x Emissions

Affected Source Category	CO₂ Emissions (tons/year)	CH₄ Emissions (tons/year)	N₂O Emissions (tons/year)	CO₂e Emissions (million MT /year)	SO_x Emissions (tons/year)
Electric Utilities	31,979,163	543	60	29.04	162.3
Cogeneration	435,527	7	1	0.40	4.6
Oil and Gas Production (Combustion)	12,399,435	538	107	11.29	7.8
Petroleum Refining (Combustion)	10,623,546	180	20	9.65	0.3
Manufacturing and Industrial	6,867,879	116	13	6.24	411.1
Food and Agricultural Processing	432,876	8	1	0.39	10.2
Service and Commercial	7,863,528	133	15	7.14	213.8
Other (Fuel Combustion)	233,156	8	2	0.21	10.0
<i>TOTAL Fuel Combustion</i>	70,835,108	1,535	219	64.35	820.15

TABLE D-1 (Continued)
CO₂, CH₄, and N₂O Emissions from 2007 AQMP for R1304 and R1309.1 Sources and Corresponding SO_x Emissions

Affected Source Category	CO₂ Emissions (tons/year)	CH₄ Emissions (tons/year)	N₂O Emissions (tons/year)	CO₂e Emissions (million MT CO₂ eq /year)	SO_x Emissions (tons/year)
Sewage Treatment	865,994	15	2	0.79	0.1
Landfills	1,521,401	22	2	1.38	102.3
Incineration	0	85	0	0.00	2.1
Other (Waste Disposal)	0	15,101	0	0.29	0.0
<i>TOTAL Waste Disposal</i>	2,387,395	15,222	4	2.46	104.47
Laundering	0	0	0	0.00	0.0
Degreasing	0	0	0	0.00	0.0
Coatings and Related Processes	37,246	1	0	0.03	0.3
Printing	29	0	0	0.00	0.0
Adhesives and Sealants	0	0	0	0.00	0.0
Other (Cleaning and Surface Coatings)	2,539,824	43	5	2.31	4.8
<i>TOTAL Cleaning and Surface Coatings</i>	2,577,100	44	5	2.34	5.09
Oil and Gas Production	22,347	0	0	0.02	0.2
Petroleum Refining	61,456	1	0	0.06	0.0
Petroleum Marketing	0	567	0	0.01	0.0
Other (Petroleum Production and Marketing)	0	0	0	0.00	0.0
<i>TOTAL Petroleum Production and Marketing</i>	83,803	568	0	0.09	0.15
Chemical	0	247	0	0.00	0.0
Food and Agriculture	0	1	0	0.00	0.0
Mineral Processes	229,853	4	0	0.21	0.9
Metal Processes	0	0	0	0.00	0.0

TABLE D-1 (Concluded)
CO₂, CH₄, and N₂O Emissions from 2007 AQMP for R1304 and R1309.1 Sources and Corresponding SO_x Emissions

Wood and Paper	3	0	0	0.00	0.0
Glass and Related Products	0	0	0	0.00	0.0
Electronics	0	0	0	0.00	0.0
Other (Industrial Processes)	2,914,251	49	5	2.65	0.6
<i>TOTAL Industrial Processes</i>	3,144,107	301	6	2.86	1.50
Total Stationary and Area Sources	79,027,513	17,670	234	72	931

In order to account for the remaining GHGs including hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), a ratio was calculated based on the statewide inventory of high GWP pollutants (HFCs, PFCs, SF₆) to statewide GHG emissions inventory from all sources qualified for offsets under the proposed project (e.g., commercial, industrial, etc). Table D-2 provides the statewide inventory values over a three-year period and determines a ratio of HFCs, PFCs, and SF₆ emissions within the total GHG emissions from all sources. Specifically, the ratio was calculated by dividing the total high GWPs by the total GHG emissions from all affected sources (14.48/223.32 = 0.065).

TABLE D-2
California Greenhouse Gas Inventory (million metric tons CO₂e)

	2004	2005	2006	Average (2004-2006)
Electric Power (In-State, Imported)	115.65	106.35	105.92	109.31
Commercial (no residential)	13.15	12.97	13.24	13.12
Industrial	94.50	93.71	96.05	94.75
Recycling and Waste (Landfills)	5.91	6.21	6.31	6.14
TOTAL GHGs from Sources	229.21	219.24	221.52	223.32
Total High GWP	13.79	14.51	15.15	14.48
RATIO (High GWP/Sources Total)	0.060	0.066	0.068	0.065

Source: CARB GHG Inventory (<http://www.arb.ca.gov/cc/inventory/data/data.htm>)

By applying the ratio of high GWPs to all GHG sources (0.065) to the CO₂, CH₄, and N₂O emissions from 2007 AQMP (72 million MT/year), the total amount of GHG emissions of all AQMP sources can be determined ($72 \times 1.065 = 76.68$). Thus, a ratio of 76.68 million MT/year of total GHG emissions to 931 tons per year of total SO_x emissions ($76.68/931 = 0.0824$) from the 2007 AQMP, the total GHG emissions from the proposed project can be calculated using the estimated SO_x emissions from the proposed project. Estimated SO_x emission from the proposed project are listed in tons per day in Chapter 4.1 (Air Quality Direct Impacts) and converted into tons per year in Table D-3 in order to properly multiply by the ratio factor, which is based on SO_x emissions in tons per year. The years listed in Table D-3 are time periods leading to each attainment date (e.g., demonstrate attainment of the PM_{2.5} standard with reduction occurring by year 2014, demonstrate attainment of the ozone standard with reductions occurring by year 2023, and the estimated end of the project in year 2030).

TABLE D-3

**SO_x Emissions and Greenhouse Gas Emissions from the Proposed Project
(Starting in 2010)**

Attainment Year Periods	Proposed Project SO_x Emissions (tons/day)	Proposed Project SO_x Emissions (tons/year)	AQMP SO_x to GHG Emissions Ratio	Proposed Project GHG Emissions (million MT CO₂ eq /year)
2010-2014	0.16	58.4	0.0824	4.81
2010-2023	0.49	178.85	0.0824	14.74
2010-2030	0.74	270.1	0.0824	22.26

The estimated increase of 4.81 million MT CO₂e/yr by 2014, 14.74 million MT CO₂e/yr by 2023, and 22.26 million MT CO₂e/yr by 2030 as a result of the proposed project is greater than the SCAQMD's GHG significance threshold of 10,000 MT CO₂e/yr for projects in which SCAQMD is lead agency. As such, potential GHG emissions from the proposed project are concluded to be cumulatively considerable and, thus, significant.

The same methodology is used to determine GHG emissions from each of the alternatives.

CUMULATIVE GHG IMPACTS FROM THE PROPOSED PROJECT

The cumulative GHG emissions are different from the direct GHG impacts from the proposed project as it evaluates the impact from the issuance of offsets from year 2007 compared to year 2010 as part of the proposed project. Using the same methodology described above, the

cumulative GHG impacts using the same SOx emissions to total GHG emissions ratio from the 2007 AQMP inventory to determine the cumulative GHG emissions. As discussed above, the total GHG emissions includes all six pollutants including CO₂, CH₄, and N₂O, HFCs, PFCs, and SF₆. As discussed later in this appendix, three power plants may be eligible under current or pending legislation to access the SCAQMD's internal offset accounts. Thus, the impacts from the legislation are not a direct impact from the proposed project (re-adoption of Rule 1315) but rather a related cumulative impact. In addition, one power plant will be required to a mitigation fee for SOx offsets that will be used to fund emission reduction projects that would reduce the cumulative GHG impact because the SOx is used to calculate the GHG emissions. GHG emissions from the three power plants have been evaluated and will be presented later in the appendix. Table D-4 shows the cumulative impacts from the proposed project without the power plant and mitigation fee impacts.

TABLE D-4

**SOx Emissions and Greenhouse Gas Emissions from the Cumulative Proposed Project
(Starting in 2007)**

Attainment Year Periods	Cumulative Proposed Project SOx Emissions (tons/day)	Cumulative Proposed Project SOx Emissions (tons/year)	AQMP SOx to GHG Emissions Ratio	Cumulative Proposed Project GHG Emissions (million MT CO₂ eq /year)
2007-2014	0.29	106.22	0.0824	8.79
2007-2023	0.61	223.02	0.0824	18.47
2007-2030	0.86	314.27	0.0824	26.06

**CUMULATIVE GHG IMPACTS FROM POWER PLANTS ELIGIBLE
UNDER AB1318 AND PENDING SB388**

Power plant facilities per Assembly Bill (AB) No. 1318, proposed Senate Bill (SB) 388, and possible future legislation would require transfer of emission reduction credits for certain pollutants from SCAQMD's internal credit accounts to eligible electrical generating facilities and exempt from CEQA from certain actions undertaken. AB 1318 would repeal on January 1, 2012 and proposed SB 388 would sunset on January 1, 2013. Under AB 1318, pending SB 388 and potential future legislation, at the time the analysis was performed, it was reasonably foreseeable that the SCAQMD would be required to provide offsets to three power plants from the SCAQMD's internal accounts. The three power plants are not directly affected by PR 1315, but indirect environmental impacts from the siting, construction and operation of those facilities

are considered to be cumulatively related to the proposed project (CEQA Guidelines §15130(a)(1)). The three power plant projects, CPV Sentinel Energy (Sentinel), Walnut Creek Energy Park (Walnut Creek) and NRG's El Segundo Power Redevelopment (El Segundo) were evaluated by the California Energy Commission (CEC) in separate Final Staff Assessments (FSAs), which were reviewed to obtain the environmental impact analysis and determination of significance made by the lead agency (CEC). Since the analysis was performed, El Segundo has received its permits under a Rule 1304 exemption.

The CEC did not include greenhouse (GHG) impacts in the FSAs for the El Segundo and Walnut Creek projects. However, the FSA prepared by the CEC for the Sentinel project did include GHG emissions from both the construction and operational phases of the project. Because the primary sources of emissions are combustion stationary sources, the GHG emissions evaluated are carbon dioxide (CO₂), nitrous oxide (N₂O), and methane (CH₄). Sulfur hexafluoride (SF₆) was determined to be emitted from high voltage equipment at Sentinel, specifically from gas insulated switches. The other GHGs, such as hydrofluorocarbons (HFCs) and perfluorocarbons, are not typically byproduct emissions from combustion sources and not included in the GHG analysis for the Sentinel project. In general, GHG emissions are emitted from power plants sources such as combustion turbine generators (CTGs) during operation and start-up/shutdown; firewater pumps; black start generators; and boilers. The established methodology to equate emissions from the different GHGs is to apply a global warming potential (GWP). GWP is a measure of how much a given mass of a GHG is estimated to contribute to global warming based on a relative scale comparing the gas in question to that of the same mass of carbon dioxide (whose GWP is by convention equal to 1). Table D-5 lists the GWPs for the applicable GHGs and the emission factors for both the CTGs and engines operated at the Sentinel site.

TABLE D-5
GWPs and Emission Factors from the CPV Sentinel Project

GHG	Global Warming Potential (GWP)	CTG Emission Factor (lbs/mmBTU)	Engine Emission Factor (lbs/mmBTU)
CO ₂	1	114.5	161
CH ₄	21	0.003	0.002
N ₂ O	310	0.0086	0.0008
SF ₆	23,900	n/a	n/a

The appropriate GWP for N₂O, CH₄ and SF₆ emissions was applied to each to add to CO₂ emissions to determine total CO₂ equivalence (CO₂eq) in metric tons (MT). The heat and fuel input for the applicable equipment, along with the rated capacity and hours of operation, that

were provided in the FSA prepared by the CEC for the Sentinel project are listed in Table D-4. Table D-4 also shows the annual CO₂eq emissions from each group of equipment. Annual CO₂eq emissions are calculated by multiplying the heat or fuel input rate to the default emission factors (in Table D-3) and hours of operation for each piece of equipment.

SF₆ emissions are calculated using a different methodology. In that case, the capacity of SF₆ is needed to determine the annual emissions (one percent of capacity) and the “end of the life” emissions (70 percent of capacity). The annual emissions are multiplied by the lifetime period (30 years) and added to the “end of the life” emissions for total 30-year emissions, which are then divided by the lifetime period to determine the average annual SF₆ emissions. The GWP for SF₆ is applied to the average annual SF₆ emissions from one gas insulated switch to obtain the CO₂eq, then converted to MT and multiplied by eight since the project has eight switches.

The CO₂eq emissions from all equipment were added to calculate the total GHG emissions from the Sentinel project and can be found in Table D-6. Table D-7 lists the GHG emissions from all equipment as presented in the Sentinel FSA prepared by the CEC. The total CO₂eq emissions recreated in Table D-6 and those provided in the FSA (Table D-7) are not identical due to a slight difference in rounding numbers, but comparatively the same.

TABLE D-6

Input Parameters to Calculate Total GHG Emissions at the CPV Sentinel Project

Equipment	Heat Input Rate (mmBTU/hr)	Fuel Input Rate (gal/hr)	Rated Capacity (MW)	Rated Capacity (BTU/gal)	Hours of Operation	CO₂ eq (MT/yr)
CTG (units 1-5) - Operation	875.7	--	106.25	--	2628	613,144.86
CTG (units 6-8) - Operation	875.7	--	106.25	--	3200	447,959.72
CTG (units 1-5) – Startup/ Shutdown	175.14	--	106.25	--	177	8,259.26
CTG (units 6-8) – Startup/ Shutdown	175.14	--	106.25	--	206	5,767.48
Firewater Pump	--	10.3	--	137,000	199	20.59
Black Start Generator	--	103.57	--	137,000	199	207.01

TABLE D-6 (Concluded)**Input Parameters to Calculate Total GHG Emissions at the CPV Sentinel Project**

Equipment	Capacity (kg)	Annual (1% capacity)	End-of Life (70% capacity)	Total 30- year Emissions (kg)	Average Annual Emission (kg)	---
GIS (8)	126	1.26	88.2	126	4.2	803.04
TOTAL GHGs (MT/yr)						1,076,161.96

TABLE D-7**Total GHG Emissions from the CPV Sentinel Project (from CEC's FSA)**

Equipment	CO₂ Emissions (MT/year)	N₂O Emissions (CO₂eqMT/year)	CH₄ Emissions (CO₂eqMT/year)	Total Annual CO₂eq (MT/year)
Five (5) CTGs -Operation (106 MW)	607,916.50	4,854.79	942.64	613,713.93
Five (5) CTGs - Start Up/Shutdown (106 MW)	8,188.83	65.40	12.70	8,266.93
Three (3) CTGs -Operation (106 MW)	444,139.91	3,546.88	688.69	448,375.48
Three (3) CTGs -Start Up/Shutdown (106 MW)	5,718.30	45.67	8.87	5,772.84
Diesel Fired Backup Firewater Pump (240 bhp)	20.34	0.03	0.01	20.38
Black Start Generator (2,206 bhp)	204.56	0.31	0.05	204.92
Eight (8) Gas Insulated Switches (GIS)*	--	--	--	803.04
TOTAL GHGs (MT/yr)				1,077,157.52

* SF6

The FSAs for the El Segundo and Walnut Creek projects provided rated capacity and hours of operation for the equipment but did not provide heat or fuel input. Using the heat input, fuel input, and default emission factors provided in the Sentinel FSA (see Table D-6), the GHG emissions from the El Segundo and Walnut Creek projects were calculated. A ratio of the rated

capacity to heat/fuel input from the Sentinel project was used to determine the heat and fuel input at the El Segundo and Walnut Creek projects. Based on the available emission factors and methodology from the Sentinel project, the CO₂eq emissions from the equipment to operate the El Segundo and Walnut Creek projects could be calculated and found in Tables D-8 and D-9.

TABLE D-8
Total GHG Emissions at the El Segundo Project

Equipment	Heat Input Rate (mmBTU/hr)	Fuel Input Rate (gal/hr); (mmscf/hr)	Rated Capacity (MW)	Rated Capacity (BTU/gal)	Hours of Operation	CO₂ eq (MT/yr)
Two CTG (units 5,7) - Operation	1512	--	183	--	2099	338,225.70
Two CTG (units 5,7) – Startup/Shutdown	302	--	183	--	365	11,747.41
Firewater Pump (265 bhp)	--	11.4	--	137,000	200	22.90
Two (2) Boilers - Units 3/4	--	1	302	--	8760	1,114,019.55
Equipment	Capacity (kg)	Annual (1% capacity)	End-of Life (70% capacity)	Total 30-year Emissions (kg)	Average Annual Emission (kg)	---
GIS (6)	126	1.26	88.2	126	4.2	602.28
Note: 1 scf = 1030 BTU/hr; 1 MW = 3.41 mmBTU/hr						TOTAL GHGs (MT/yr)
						1,464,617.84

TABLE D-9**Total GHG Emissions at the Walnut Creek Project**

Equipment	Heat Input Rate (mmBTU/hr)	Fuel Input Rate (gal/hr)	Rated Capacity (MW)	Rated Capacity (BTU/gal)	Hours of Operation	CO₂ eq (MT/yr)
Five CTGs - Operation	781.20	--	103	--	3,200	666,031.23
Five CTGs – Startup/Shutdown	156.24	--	103	--	350	14,569.43
Diesel Fired Backup Firewater Pump (340 bhp)	--	14.60	--	137,000	50	7.33
Equipment	Capacity (kg)	Annual (1% capacity)	End-of Life (70% capacity)	Total 30-year Emissions (kg)	Average Annual Emission (kg)	---
GIS (5)	126	1.26	88.2	126	4.2	501.90
Note: 1 scf = 1030 BTU/hr; 1 MW = 3.41 mmBTU/hr						TOTAL GHGs (MT/yr)
						681,109.90

TABLE D-10**Total GHG Emissions from the Operation of the Three Power Plant Projects**

GHG Emissions (MT/yr)	CPV Sentinel Upgrade	NRG El Segundo Repower Project	Walnut Creek Energy Park	Total GHG Emissions (MT/yr)	SCAQMD GHG Significance Threshold (MT/yr)
CO ₂ eq (operation)	1,077,158	1,464,618	681,110	3,222,885	10,000

TOTAL CUMULATIVE GHG IMPACTS FROM THE CUMULATIVE PROPOSED PROJECT, POWER PLANTS AND CPV SENTINEL MITIGATION FEE

Pursuant to AB 1318, CPV Sentinel will be paying a mitigation fee for SO_x and PM₁₀ offsets that will be spent on emission reduction projects. Because SO_x emissions have been used to determine GHG emissions, a change in SO_x emissions from the cumulative proposed project would affect the resulting GHG emissions impact. SO_x and PM₁₀ emissions reduced by emission reduction projects funded by the mitigation fee to be paid by CPV Sentinel have been estimated, based on current best available control technology (BACT) incremental cost effectiveness. BACT incremental cost effectiveness refers to the maximum cost per ton of emission reductions for a given pollutant specified in SCAQMD's BACT Guidelines. Table D-11 lists the minor source BACT incremental cost effectiveness that were originally adopted in the SCAQMD 1995 BACT Guidelines, adjusted to second quarter 2003 dollars and published in the July 14, 2006 SCAQMD BACT Guidelines. The adjustment was done using the Marshall and Swift Equipment Cost Index, the same index used to adjust the 2003 dollars to first quarter 2010 dollars as listed in Chemical Engineering (April 2010). Both sets of BACT incremental cost effectiveness can be found in Table D-11.

TABLE D-11
BACT Incremental Cost Effectiveness

	VOC (\$/ton)	CO (\$/ton)	NO_x (\$/ton)	SO_x (\$/ton)	PM₁₀ (\$/ton)	PM_{2.5} (\$/ton)
Minor Source BACT, July 2004	60,600	1,150	57,200	30,300	13,400	13,400
Adjusted for 2010	78,356	1,487	73,960	39,178	17,326	17,326

As noted above, CPV Sentinel will be paying a mitigation fee for SO_x and PM₁₀ offsets, as adopted by the Governing Board. Table D-12 outlines the SO_x and PM₁₀ emissions, based on limits set in AB1318, and the mitigation fee expected to be paid. Table D-12 also shows the daily emission reductions from the spending of the fees on emission reductions project. To calculate the daily reductions, multiply the fee to the emissions and divide by the adjusted 2010 BACT incremental cost effectiveness (listed in Table D-11). Finally, to put the life of the equipment into perspective, a capital recovery factor (CRF) is applied. It is assumed a 10-year project life (CRF factor = 0.123) and 365 days of operation per year.

TABLE D-12
CPV Sentinel Mitigation Fee and Daily Emission Reductions

	VOC	CO	NOx	SOx	PM10	PM2.5
Sentinel Mitigation Fee (\$/lb) ¹	n/a	n/a	n/a	15,083	50,417	n/a
Emissions from AB1318 (lbs/day) ²	n/a	n/a	n/a	38	324	n/a
CRF Factor ³	n/a	n/a	n/a	0.123	0.123	0.123
DAILY EMISSION REDUCTIONS (tons/day)⁴						
2010-2014 ⁵	n/a	n/a	n/a	0.001	0.06	0.04
2010-2023 ⁵	n/a	n/a	n/a	0.003	0.21	0.13
2010-2030	n/a	n/a	n/a	0.005	0.32	0.20

1. Based on July 13, 2007 PAR 1309.1 Zone 1 Fee
2. AB 1318 lists SOx (13,870) and PM10 (118,260) in pounds per year; assume 365 days of operation per year
3. Based on a 10-year project life; 365 days of operation per year
4. Sample Equation at 2030: SOx Fee x SOx Emissions/SOx BACT cost effectiveness x CRF/365 days/year. (15,083 x 38/39,178 x 0.123/365 = 0.005)
5. The previous years are an increment of PR1315's 20-year project life ending in 2030 (Example: 2010-2014 is 4/20 of 0.011 = 0.002 and 2010-2023 is 13/20 x 0.011 = 0.007)

The SOx emission reductions from the implementation of emission reductions projects funded by the CPV Sentinel results in corresponding GHG emissions using the same methodology as described in determining GHG emissions from the direct proposed project described earlier in the this appendix. Table D-13 calculates the GHG emission benefit by applying the AQMP SOx to GHG emissions ratio to the SOx emissions calculated in Table D-12.

TABLE D-13
SOx Emission Reductions and Greenhouse Gas Emissions Benefits from the Implementation of Emission Reduction Projects Funded by CPV Sentinel Fee

Year	SOx Emission Reductions (tons/day)	SOx Emission Reductions (tons/year)	AQMP SOx to GHG Emissions Ratio	GHG Emission Benefits (million MT CO ₂ eq /year)
2014	0.001	0.37	0.0824	0.03
2023	0.003	1.10	0.0824	0.09
2030	0.005	1.83	0.0824	0.15

The GHG emissions for the power plant projects were based on the CEC’s GHG analysis for the CPV Sentinel project applied to the El Segundo and Walnut Creek projects. The total GHG emissions from the construction and operation of the three power projects were determined to be 3.22 million metric tons of CO₂e per year as shown earlier in this appendix. Table D-14 provides the total cumulative GHG impact from the proposed project, which includes a benefit from implementing emission reduction projects funded by the CPV Sentinel mitigation fee. The benefit is an amount subtracted from the total of cumulative proposed project and power plant GHG emissions.

TABLE D-14

Total Cumulative Proposed Project GHG Impacts (Including Power Plants Impacts and CPV Sentinel Mitigation Fee Benefits)

Attainment Year Periods	Cumulative Proposed Project GHG Emissions (million MT CO ₂ eq /year)	Power Plant GHG Emissions (million MT CO ₂ eq /year)	GHG Emission Benefits (million MT CO ₂ eq /year)	Total Cumulative Proposed Project GHG Emissions (million MT CO ₂ eq /year)
2007-2014	8.79	3.22	0.03	11.98
2007-2023	18.47	3.22	0.09	21.61
2007-2030	26.06	3.22	0.15	29.13

The estimated increase of approximately 12 million MT CO₂e/yr by 2014, 22 million MT CO₂e/yr by 2023, and 29 million MT CO₂e/yr by 2030 as a result of the total cumulative proposed project is greater than the SCAQMD’s GHG significance threshold of 10,000 MTCO₂e/yr for projects in which SCAQMD is lead agency. As such, potential GHG emissions from the proposed project are concluded to be cumulatively considerable and, thus, significant.

APPENDIX E

HISTORIC PERMIT DATA AND NAICS CODE CATEGORIZATION

Appendix E: Permit Data Set (6230 facilities), NAICS Codes Categories

Count of NAICS				
Facility Category	Sub Category / NAICS Code	Facility Name	Total	
Agricultural	Animal Production 112000	ASPEN DAIRY, DIV OF WEST STAR DAIRY	1	
		EAST HIGHLAND RANCH VALERO, AYSAR HELO	1	
		GREEN ACRES DAIRY, EDWARD HARINGA DBA	1	
		DEL AMO DAIRY	1	
		MIRSMA DAIRY #1, HARLAN E. MIRSMA	1	
		NORTHVIEW DAIRY	1	
		WESTWALKER	1	
	Animal Production Total			7
	Support Activities for Agriculture and Forestry	115112	AMERICAN REMEDIAL TECHNOLOGIES, INC.	1
			SLABY ENVIRONMENTAL INC.	1
		115114	MC ANALLY ENTERPRISES INC	1
			SUNKIST GROWERS, INC	1
		115210	CIRCLE OF LIFE, MARGUERITE C JOHNSON	1
			HY-LINE INTERNATIONAL	1
			PALM SPRINGS CITY, WASTE WATER TREATMENT	1
	Support Activities for Agriculture and Forestry Total			7
	Agricultural Total			14
Commercial	Accommodation 721100 721110	HOLLYWOOD METROPOLITAN HOTEL	1	
		AP-LONG BEACH AIRPORT LLC	1	
		BRIGHTON GARDENS OF SAN JUAN CAPISTRANO	1	
		CALICO PETROLEUM	1	
		COURTYARD BY MARRIOTT	1	
		COURTYARD BY MARRIOTT - MARINA DEL REY	1	
		COURTYARD BY MARRIOTT BALDWIN PARK	1	
		FOUR SEASONS HOTEL LA	1	
		HESS MICROGEN, LLC	1	
		HILTON HOTELS CORP	1	
		HYATT REGENCY CENTURY PLAZA	1	
		NEWPORT BEACH CITY - UTILITIES DEPT	1	
		OMNI HOTEL LOS ANGELES	1	
		ORANGE COUNTY PERFORMING ARTS CENTER	1	
		RADISSON HOTEL NEWPORT BEACH	1	
		SHC BEVERLY HILLS II LLC/LOEWS HOTEL	1	
		SIMMAX ENERGY, LLC	1	
	THE ISLAND HOTEL	1		
	THE PENINSULA BEVERLY HILLS,THE BELVEDER	1		
	WALTER FAMILY PART./HILTON PALM SPRINGS	1		
	SNOW SUMMIT INC	1		
	URBAN HOTELS INC DBA RAMADA PLAZA HOTEL	1		
	MT. SAN ANTONIO GARDENS - FOOD SERVICE	1		
	Accommodation Total			23
	Administrative and Support Services	561000 561110 561210	ANA TORRANCE JOINT VENTURE	1
			DIAMOND WELDING AND SANDBLASTING	1
			PROCESS SOLUTIONS, DIV VEOLIA WATER N AM	1
			FOUR SEASONS HOTEL	1
			HILTON IRVINE HOTEL/ORANGE CNTY AIRPORT	1
			IKEA CALIFORNIA LLC	1
			J C PENNEY LOGISTICS LP	1
			WESTIN BONAVENTURE HOTEL	1
			3780 WILTERN CENTER LLC	1
ADLER REALTY INVESTMENTS, INC.			1	
ECOLOGY CONTROL INDUSTRIES	1			

Commercial	561210	ENVENT CORPORATION	1	
		ENVIRONMENTAL RESOLUTIONS INC	8	
		INNOVATIVE CONSTRUCTION SOLUTIONS	1	
	561320	INNOVATIVE CONSTRUCTION SOLUTIONS, INC	1	
		ADMINISTAFF CLIENT SERVICES LP	1	
	561499	BEST WEST AUTOMOTIVE INC	1	
		CANYON HILLS CLEANERS	1	
		COCO ENTERPRISE, INC	1	
		DG COGEN PARTNERS LLC	1	
		DYER PETROLEUM INC	1	
		EELA & COMPANY INC, LINCOLN VALERO	1	
		FIRST WILSHIRE PARTNERS, LLC	1	
		JVH ENTERPRISES, INC.	1	
		MAVAT ENTERPRISES INC	1	
		TRINITY BAT CO	1	
		U S POSTAL SERVICE	1	
		WILSHIRE LA JOLLA ASSOC., LP	1	
		XTREME DESIGNS USA	1	
		L J STATION	1	
		561510	AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA	1
		561599	KASTLE SYSTEMS OF LOS ANGELES INC	1
		561621	WARREN E&P, INC	1
	561700	BROADWAY 707 WILSHIRE FEE LLC/AON CTR	1	
		RODRIGUEZ SANDBLASTING	1	
	561710	ORKIN, INC	1	
	561720	99 CLEANERS	1	
		BUDGET GRAPHIC SERVICES INC	1	
		CORPORATE CLEANERS, JUNG HAN DBA	1	
		GLENDAL UNI SCH DIST/GLENDAL HIGH SCH	1	
		GOLDEN RAIN FOUNDATION OF LAG HILLS	1	
		L A CITY,DEPT OF GEN SERV, FIRE STA #401	1	
		LA CITY, DEPT OF GEN SERVICES	1	
		PASADENA UNI SCH DIST	1	
TOWN & COUNTRY CLEANERS & SHIRT LAUNDRY		1		
US GOVT, AF DEPT, L.A. A.F.B. AREA B		1		
561730		J. V. ENTERPRISES, VINCENT P. BORZILIERI	1	
PACIFIC PALMS CONFERENCE RESORT		1		
PARKWEST LANDSCAPING, INC.		1		
TREECO ARBORIST, INC.		1		
UNITED MEMORIAL PROD- ROSE HILLS MEM PK		1		
561740		EAGLE MEX BUILDING SERVICES INC	1	
561790		LEKOS DYE AND FINISHING, INC	1	
CUSTOM COMMERCIAL FABRIC RESTORATION SRV	1			
GREEN CLEAN, GIL HYON YOON DBA	1			
NOHL RANCH MINIMART	1			
QUALA SYSTEMS INC	1			
561910	CAPCO CUSTOM PACKAGING	1		
CLARIANT CORPORATION	1			
JASCO CHEM CORP., INC	1			
NOR-CAL BEVERAGE COMPANY, INC.	1			
SHIELD PACKAGING OF CAL INC	1			
561920	BUMPER TECH, PEDRO RAMIREZ DBA	1		
GES EXPOSITION SERVICES	1			
561990	ADMORE, INC.	1		
AL'S FINISHING	1			
BONAMI, INC.	1			
CHARTER COMMUNICATIONS	1			
CHARTER COMMUNICATIONS, INC	1			
J B SHUTTERS, JOSE BURCIAGA DBA	1			
KOOS MANUFACTURING INC	1			
LECHON'S FURNITURE FINISHINGS	1			
MEXI FOAM PRODUCTS	1			
OLD WORLD STAINERS INC	1			
SALGADO AUTO BODY	1			
SOUTHERN CALIFORNIA AUTO AUCTION	1			
SWISSTEX CALIFORNIA INC.	1			
Administrative and Support Services Total			84	

Commercial			
Broadcasting (except Internet)			
515111	LIBERMAN BROADCASTING, INC.		1
515112	CBS CORPORATION		2
	ENTRAVISION COMMUNICATIONS CORP		1
515120	KTTV - FOX TELEVISION STATIONS, INC.		1
	NBC WEST LLC		1
	THE WALT DISNEY COMPANY		1
515210	CHARTER COMMUNICATIONS, INC		2
	COX COMM OF OR. CO., RSM SWITCH/HUB		1
Broadcasting (except Internet) Total			10
Credit Intermediation and Related Activities			
522000	AEG ONTARIO LLC, CITIZENS BUSINESS BANK		1
	BANK OF AMERICA, N.A.		1
	KCO ONE, KOLL MANAGEMENT SERVICES		1
	WESCOM CREDIT UNION		1
522110	TEMECULA VALLEY USD, GREAT OAK HS		1
	UNION BANK BLDG, 400 OCEANGATE LTD.		1
	WELLS FARGO BANK		1
522120	BANK OF AMERICA-LOS ANGELES DATA CENTER		1
	PACIFIC PREMIER BANK		1
522130	ARROWHEAD CENTRAL CREDIT UNION		1
522200	CARMAX AUTO SUPERSTORES CA, LLC # 7136		1
522292	COUNTRYWIDE HOME LOAN		1
	COUNTRYWIDE HOME LOANS		1
522298	KINECTA FEDERAL CREDIT UNION		1
522310	2 N LAKE BLDG LLC		1
	AMERIQUEST MORTGAGE COMPANY		1
	PROCESS SOLUTIONS,VEOLIA WATER OPER.SRV		1
	SO CAL EDISON CO		1
522320	ORLANDI VALUTA		1
Credit Intermediation and Related Activities Total			19
Data Processing, Hosting and Related Services			
518111	DIGITAL INSIGHT		1
	INTERNET SPECIALTIES WEST INC		1
518210	EARTHLINK, INC.		1
	INFOCROSSING WEST		1
	KAISER PERMANENTE L A MEDICAL CENTER		1
Data Processing, Hosting and Related Services Total			5
Funds, Trusts, and Other			
Financial Vehicles			
525000	OHIO TEACHER'S RETIREMENT		1
525910	CAPITAL GROUP COMPANIES		1
525930	G&L 436 BEDFORD LLC		1
	OSEP L.L.C.		1
	OSEP, LLC		1
	PUBLIC STORAGE INC		1
525990	THE REALTY ASSOCIATES FUND VII LP		1
Funds, Trusts, and Other Financial Vehicles Total			7
Insurance Carriers and Related Activities			
524000	KAISER FOUNDATION HEALTH PLAN, INC.		1
524113	LA CITY, DEPT OF GEN SERVICES		1
524114	KAISER PERMANENTE		1
	KAISER PERMANENTE/INDEPENDENCE PARK FAC		1
	PACIFICARE HEALTH SYSTEM		1
524126	THE ZENITH INSURANCE COMPANY		1
524210	AUTOMOBILE CLUB OF SO CAL		1
	MC DOWALL, INC.		1
	WARNER PACIFIC INSURANCE		1
524298	FARMERS INSURANCE GROUP		1
Insurance Carriers and Related Activities Total			10

Commercial			
Management of Companies and Enterprises			
551112	SF HOLDING SUPERFINE TEXACO		1
	VOPAK TERMINAL LOS ANGELES, INC.		1
Management of Companies and Enterprises Total			2
Other Information Services			
519110	NEW WAVE CONVERTING INC		1
	S & B FILTERS, INC		1
	S & S REFRIGERATION		1
519120	HUNTINGTON LIBRARY/ART GALLERY/BOT GARDN		1
	LA CITY, CENTRAL PUB LIBRARY		1
	MONROVIA CITY, DEPT OF PUBLIC WORKS		1
	NAVIGATION SYSTEMS DIVISION		1
	PASADENA CITY, DWP UNIT NO. 1		1
Other Information Services Total			8
Professional, Scientific, and Technical Services			
541000	A.T. DESIGNS INSIGNIA INC.		1
	ADVANCED GEONENVIRONMENTAL, INC		1
	AGGRESSIVE DESIGNS		1
	ARCO/DELTA ENVIRONMENTAL CONSULTANTS		1
	DOT GRAPHICS		1
	DREWELOW REMEDIATION EQUIPMENT INC		1
	DREWELOW REMEDIATION EQUIPMENT, INC		1
	ENVIRONMENTAL ENGINEERING & CONTRACTING		1
	ENVIRONMENTAL RESOLUTIONS INC		3
	ENVIRONMENTAL RESOLUTIONS, INC		7
	ENVIRONMENTAL RESOLUTIONS, INC.		3
	ENVIRONMENTAL SYSTEMS RESEARCH INSTITUTE		1
	FANTASY II FILM EFFECTS INC		1
	FREY ENVIRONMENTAL INC		3
	FREY ENVIRONMENTAL, INC		2
	FREY ENVIRONMENTAL, INC.		4
	FUSION DISPLAY & DESIGN INC		1
	GUY MARTIN DESIGN, LTD.		1
	KIA DESIGN CENTER		1
	RM ENVIRONMENTAL, INC		1
	SILVER STREAM PRODUCTION & DESIGN INC.		1
	STRATUS ENVIRONMENTAL		1
	TAYLOR GRAPHICS		1
	YORBA REGIONAL ANIMAL HOSPITAL		1
541110	YOUNG ELECTRIC SIGN COMPANY		1
	REMEDIATION & LIABILITY MGMT CO INC		1
	RODRIGUEZ SANDBLASTING, C. RODRIGUEZ DBA		1
	SHELL OIL PRODUCTS US-HSE/S&E		1
	SOMITO CAPITAL LP		1
	US GOVT. FED BLDG GSA		1
541213	OPTION ONE MORTGAGE CORPORATION		1
541310	EXXONMOBIL OIL CORPORATION		1
541320	D L LONG LANDSCAPING		1
	LA CITY DWP, BEVERLY GLEN P S		1
541330	ACE ENVIRONMENTAL		1
	AGRICULTURAL WASTE SOLUTIONS, INC.		1
	AMAN ENVIRONMENTAL CONSTRUCTION INC		1
	ANCHEN PHARMACEUTICALS, INC.		1
	ATC ASSOCIATES INC.		1
	ATLAS ENVIRONMENTAL ENGINEERING INC		1
	ATLAS ENVIRONMENTAL ENGINEERING INC.		1
	BAYVIEW SERVICE GROUP INC		1
	BELL INDUSTRIES INC		1
	BRYAN A STIRRAT & ASSOCIATES		1
	COSMOTRONIC CORPORATION		1
	DEMIL INTERNATIONAL		1
	DREWELOW REMEDIATION EQUIPMENT INC		2

Commercial	541330	DREWELOW REMEDIATION EQUIPMENT INC.	2		
		DREWELOW REMEDIATION EQUIPMENT, INC.	4		
		DYNACAST, INC.	1		
		ECOTECH ENVIRONMENTAL, CORPORATION	1		
		EDW. APFFEL CO	1		
		ENVIRONMENTAL ASSESSMT & REMEDIATION MG	1		
		ENVIRONMENTAL GEOSCIENCE SERVICES	1		
		ENVIRONMENTAL SUPPORT TECHNOLOGIES INC	1		
		FERGUSON DISTRIBUTION,THE REYNOLDS GROUP	1		
		FERO ENVIRONMENTAL ENGINE	1		
		GARNER ENGINEERING INC	1		
		GEM MOBILE TREATMENT SERVICES, INC.	1		
		GENERAL SERVICE ADMIN/FED COURT OF APPE	1		
		GOLDEN ACQUISITION CORP DBA EFS WEST	1		
		GOOD EARTHKEEPING ORGANIZATION	1		
		KEYSTONE ENGINEERING COMPANY	1		
		KNOLLWOOD ASSOCIATES	1		
		LFR INC	1		
		NORTHROP GRUMMAN CORPORATION	1		
		SANTA CLARITA LLC	1		
		SECOR INTL INC./ARCO	1		
		SECOR INTL, INC./ATLANTIC RICHFIELD CO.	1		
		TAIT ENVIRONMENTAL MANAGEMENT	1		
		DICKSON TESTING CO. INC.	1		
		541380	1	GE ENERGY & ENVIRONMENTAL RESEARCH CORP	1
			1	TOYOTA TECHNICAL CENTER USA INC	1
		541410	1	BLUE LAKE ENERGY	1
			1	QUALITY BLINDS & INTERIORS	1
			1	STERIGENICS US, LLC	1
			1	STERIS, INC.	1
		541430	1	GERARD SIGNS & GRAPHICS INC	1
			1	INLAND BUILDING CONSTRUCTION CO, INC	1
			1	KAOS DIGITAL, INC	1
		541511	1	EDGE CIRCUIT TECHNOLOGY	1
			1	SOLID CONCEPTS	1
			1	UNISYS CORP	1
		541513	1	COMPUTER SCIENCES CORPORATION	1
		541600	1	100 BAYVIEW CIRCLE LLC	1
			1	14830 CARMENITA RD LLC/GCR TIRE CTRS	1
			1	2000 AVE OF THE STARS/TRAMMELL CROW CO.	1
			1	2500 WILSHIRE LLC	1
			1	331 N MAPLE ASSOCIATES LLC	1
			1	3350 WILSHIRE LLC	1
			1	416 BEDFORD LLC	1
			1	4-OVER INC	1
	1	6131 ORANGETHORPE, LLC	1		
	1	8971 KATELLA LLC/DBA PRENO GAS	1		
	1	AAA IMAGING INC.	1		
	1	ABBOTT LABORATORIES - DIAGNOSTICS DIV.	1		
	1	ADVANCED CARDIOVASCULAR SYSTEMS	1		
	1	AE COM/DMJMH+N	1		
	1	AFFORDABLE BURIAL & CREMATION SVC INC	1		
	1	AFTER HOURS FORMALWEAR	1		
	1	ALTA NURSERY, INC.	1		
	1	AMESBURY GROUP - BANDLOCK CORP	1		
	1	AMISH COUNTRY GAZEBOS	1		
	1	ANGELUS BLOCK CO INC.	1		
	1	ANTHONY CALIFORNIA INC	1		
	1	APT ELECTRONICS, INC	1		
	1	ARROW RECYCLING SOLUTIONS INC	1		
	1	ARTWEAR, INC.	1		
	1	ATLANTIC RICHFIELD CO - RAY VOSE	1		
	3	ATLANTIC RICHFIELD COMPANY	3		
	1	BIOSOLID REDUCTION TECHNOLOGIES, LLC	1		
	1	C I M GROUP, LLC - GALAXY	1		
	1	CAR MAX AUTO SUPERSTORES CALIF LLC #7126	1		
	1	CENTURY QUALITY MANAGEMENT	1		
	1	CENTURY SQUARE	1		

Commercial	541600	CHEVRON ENVIRONMENTAL MGMT CO	1
		COAST COMPOSITES INC	1
		COLOUR CONCEPTS INC	1
		CONTAINER COMPONENTS INC.	1
		CONVENIENCE RETAILERS LLC - 2705741	1
		CROSSROAD PETROLEUM, INC.	1
		D G PERFORMANCE SPECIALTIES, INC	1
		DB BUILDING FASTENERS, INC.	1
		DOUBLETREE CHEVIOT HOLDINGS, LLC	1
		DRC., INC	1
		DYNAMIC SHUTTERS INC	1
		EARL SCHEIB OF CALIFORNIA INC	1
		EDELBROCK PERMANENT MOLD, LLC	1
		ENVIRONMENTAL RESOLUTIONS INC	2
		ENVIRONMENTAL RESOLUTIONS, INC	1
		ENVIRONMENTAL RESOLUTIONS, INC.	3
		ENVIRONMENTL RESOLUTIONS	1
		EQUITY OFFICE MANAGEMENT, LLC	1
		EXBON DEVELOPMENT, INC.	1
		FREY ENVIRONMENTAL, INC	1
		GLOBALPORT FUELING SERVICES LLC	1
		GRACE ELECTRON LLC	1
		INKSOLUTIONS LLC	1
		IRVINE APARTMENT COMMUNITIES	1
		JPR ENVIRONMENTAL/ALL TEX	1
		JUST 4 FUN LLC	1
		KRT MANAGEMENT INC. DBA NORTHSTAR ENV RE	1
		LAKELAND DEVELOPMENT COMPANY	1
		LEGACY PARTNERS I BURBANK LLC	1
		LEYMASTER ENVIRONMENTAL CONSULTING LLC	1
		LEYMASTER ENVIRONMENTAL CONSULTING, LLC	1
		LOT 114 INVESTORS, LLC	1
		MARQUEZ DAIRY LLC	1
		MCLD HOLDINGS LLC	1
		MIGHTY WHITEY, LLC	1
		ORION ENVIRONMENTAL INC	1
		PACIFIC AGGREGATES INC.	1
		PACIFIC CONTINENTAL ENGINES, INC.	1
		PACIFIC EARTH SCULPTURES INC	1
		PACIFIC EDGE ENGINEERING INC.	1
		PACIFIC OIL COOLER SERVICE INC	1
		PCH @ 19TH STREET, LLC, SUNSET CHEVRON	1
		ROYAL ADHESIVES AND SEALANTS LLC	1
		RREEF MANAGEMENT	1
		SDP LLC	2
SDP, LLC	1		
SDP, LLC	2		
STUART CELLARS LLC	1		
TEA KHENG FACILITY, MR. TEA KHENG	1		
TJ INVESTMENTS, TOM SCOTT DBA	1		
UNION CHINA INVESTMENT & DEVELOPMENT GRP	1		
VALERO, THREE FOUR INC.	1		
VERIZON CALIFORNIA, INC.	1		
VEST, INC.	1		
WEST OCEAN ASSOCIATION	1		
WESTERN FEDERAL CREDIT UNION	1		
WESTLAKE WELLBEING PROPERTIES, LLC	1		
WESTWOOD ONE, INC; KQL2-FM	1		
WHB BILTMORE, LLC	1		
541611	1	WILSHIRE/WESTERN CONDOS, LLC	1
	1	CHEVRON PRODUCTS COMPANY	1
	1	EQUILON/SHELL,CONICO CORO,P.HONG #121744	1
	1	EXXONMOBIL, SOBHY YOUSEF, 17797, #18-EWF	1
	1	MERIDIAN MANAGEMENT CORP.	1
	1	MERIDIAN MANAGEMENT CORPORATION	1
	1	PALM SPRINGS CITY - CONVENTION CENTER	1
	1	POWER MANAGEMENT ENGINEERS LLC	1
	1	SIGN MANAGEMENT	1

Commercial	541611	TBS REPAIR CENTER, MELVIN PHILLIPS, DBA	1
		THE CRESCENT, SL BEVERLY HILLS 1, LLC	1
	541613	CHEVRON DLR, SS#9-3783, ROBERT D LINTZ	1
		VERIZON CALIFORNIA	1
	541618	CARLAB DEVELOPMENT	1
		CRG WEST ONE WILSHIRE, LLC	1
		IRVINE, CITY OF-OPERATION SUPPORT FAC.	1
		KAM'S AUTOMOTIVE INC	1
		LA CITY, TERMINAL ISLAND TREATMENT PLANT	1
		SOUTHGATE FOODS, INC	1
	541620	INTERNATIONAL ENV SOLUTIONS CORP	1
		UNIVERSAL CYLINDER EXCHANGE	1
	541690	APIC CORPORATION	1
		ARCO PRODUCTS C/O DELTA ENVIRON. CONSULT	1
		CAPE ENVIRONMENTAL MGMT INC/GOLDEN EAGLE	1
		ENVENT CORPORATION	1
		ENVIRON INTERNATIONAL CORPORATION	1
		ENVIRON STRATEGY CONSULTANTS INC	1
		FREY ENV INC	1
		FREY ENVIRONMENTAL INC	4
		FREY ENVIRONMENTAL, INC	2
		LAS TORRES INC	1
		LINDMARK ENGINEERING	2
		ORION ENVIRONMENTAL INC	1
		R M ENVIRONMENTAL INC	1
		RAYTHEON COMPANY	1
		TAIT ENVIRONMENTAL MANAGEMENT	1
		TARGHEE INC	1
		TRC SOLUTIONS INC	1
	541710	ASTRO PAK CORP./CLETA ST. BLDG.	1
		GENERAL TESTING AND INSPECTION INC	1
		THE AEROSPACE CORP UNIT NO.02	1
		WYLE LABORATORIES	3
	541720	AGENSYS	1
		HRL LABORATORIES, LLC	1
		LUIS LONGORIA VALERO	1
	541810	D&D DISPOSAL INC, WEST COAST RENDERING CO	1
	541850	DISPLAY IT	1
	541860	STAMPS.COM INC	1
	541890	PARADISE SIGNS	1
	541910	KELLY SPACE & TECHNOLOGY INC	1
	541990	ACTIVE MAGNETIC INSPECTIO	1
		ATLANTIC RICHFIELD CO	1
	CLEANER DEPOT, KAYMEE SIN, DBA	1	
	DESIGN CATAPULT	1	
	FRANK'S DESIGN INC	1	
	GAS AMERICA BURBANK	1	
	SAM SPADE DESIGN, LLC	1	
	Professional, Scientific, and Technical Services Total	266	
Real Estate			
531000	AQUA MAINTENANCE CORPORATION	1	
	BROADWAY CIVIC CENTER	1	
	FIGUEROA TOWER	1	
	GHARPETIAN FAMILY PROPERTIES, LLC.	1	
	HEADLANDS REALTY CORPORATION	1	
	IRWINDALE REAL ESTATE INVESTMENTS, LLC	1	
	LA LIVE PROPERTIES LLC	1	
	LA LIVE PROPERTIES, LLC	1	
	LIBERTY REAL PROPERTIES	1	
	LINCOLN PROPERTY COMPANY	1	
	LUXURIOUS PROPERTIES, LLC	1	
	MAGUIRE PROPERTIES/PACKPLACE LLC	1	
	MAGUIRE PROPERTIES/PARKPLACE LLC	1	
	REAL ESTATE HOLDINGS	1	
	SANTEE VILLAGE PARTNERS, LLC.	1	
	SUNSET MEDIA TOWER	1	
531110	ANAHEIM MEMORIAL MANOR, INC.	1	

Commercial	531110	BLAIR HOUSE, A CALIF LTD PARTNERSHIP	1
		CASA SANTA MARIA INC	1
		COMMODORE REGENCY APARTMENTS	1
		FICKETT TOWERS	1
		LA POSADA INC	1
		LIONS MANOR INC	1
		RENAISSANCE TOWER	1
		SKYLINE OWNERS ASSOCIATION	1
		THE METROPOLITAN APARTMENTS, FOREST CITY	1
	531120	550 NORTH BRAND OWNER'S CORP	1
		CITY OF ANAHEIM	1
		CITY OF GLENDALE PUBLIC WORKS FACILITIES	1
		CITY OF LA, BOS,WASTEWATER COLL SYS DIV	1
		FOX HILLS MALL LP	1
		HC SANTA MONICA PARTNERS 1 LLC	1
		LA CITY DWP	2
		LA CITY, DWP	3
		MACERICH LAKEWOOD, LLC	1
		MACERICH STONEWOOD LIMITED PARTNERSHIP	1
		MAPLE PLAZA, LTD.	1
		MARINER'S POINT, NAHAS ENTER.	1
		PARFINCO EWA LLC/ALLIANCE MGMT CORP	1
		PARFINCO EWA, LLC,C/O ALLIANCE MGMT CORP	1
		PLATINUM PARADIGM PROPERTIES LLC	1
		RICHMONT CORPORATION	1
		SONPAR, INC C/O ALLIANCE MGMT CORP	1
		SANTEE FASHION MART	1
		THRIFTY OIL CO #249	1
		THRIFTY OIL COMPANY	2
		THRIFTY OIL COMPANY/ARCO GAS STATION	1
		TWIN SPRINGS LLC	1
		VENTORO PROPERTIES, INC	1
		WESTFIELD SHOPPINGTOWN PALM DESERT	1
		WILSHIRE COURTYARD LLC	1
		WILSHIRE MAGNIN, INC/WILSHIRE GALLERIA	1
	531130	TARGET REGIONAL DISTRIBUTION CENTER	1
		WICKES FURNITURE	1
		YANKEE MINI STORAGE	1
	531190	MARCH INLAND PORT AIRPORT AUTHORITY/TAS	1
		WILSHIRE CENTER, INC.	1
	531210	21ST CENTURY OIL CORP	1
		21ST CENTURY OIL, LLC	1
		APRO OIL #11, APRO LLC	1
	ARDEN REALTY LTD PARTNERSHIP	1	
	BIJAN MINI MART, INC.	1	
	BPG 626 WILSHIRE LLC	1	
	CAMPUS 1000 FREMONT, LLC; THE ALHAMBRA	1	
	CENTURY CENTRE, LLC	1	
	CITY OF NEWPORT BCH CITY HALL, CTY ATTY	1	
	CRESCENT REAL ESTATE	1	
	DREAMWORKS FINISHING	1	
	JAMISON 3875 WILSHIRE, LLC	1	
	KOS PROPERTY MANAGEMENT	1	
	LOWE'S HIW INC	1	
	LOWE'S HIW, INC	1	
	MIREF I, LLC	1	
	NK BEVERLY HILLS CORP	1	
	PALM DESERT SHELL, SOBHY G. YOUSEF DBA	1	
	RAPID GAS #67	1	
	RAPID GAS #77	1	
	RAPID GAS INC. #26	1	
	SPRING TOWERS LOFT	1	
	THE SOURCE GROUP, INC.	1	
	ULTIMATE CLEANERS	1	
	UNITED EL SEGUNDO INC, RAPID GAS #2	1	
	UNITED OIL CO #33	1	
	UNITED OIL, RAPD GAS #60	1	
	UNITED OIL, RAPID GAS #19	1	

Commercial	531210	UNITED OIL, RAPID GAS #27	1	
		UNITED OIL, RAPID GAS #36	1	
		UNITED OIL, RAPID GAS #43	1	
		UNITED OIL, RAPID GAS #70	1	
		UNITED OIL, RAPID GAS #78	1	
		WRC PROPERTIES INC	1	
	531311	REGATTA SEASIDE H O A	1	
		THE WESTFORD CONDOMINIUM ASSOCIATION	1	
	531312	2121 AVENUE OF THE STARS LLC	1	
		BUNKER HILL APTS, MUSEUM TOWER DBA	1	
		CSDV LTD PRTNSHP/THOMAS PROP GROUP LLC	1	
	531390	HOMESTORE, INC	1	
		MERIDIAN MANAGEMENT	1	
		MERIDIAN MANAGEMENT CORP	1	
	Real Estate Total		103	
	Rental and Leasing Services			
		532000	BUDGET RENT A CAR SYS INC #1419	1
			HERTZ EQUIPMENT RENTAL CORP	1
			PINE KNOT LANDING, LLC	1
		532111	ALPHA CLEANERS	1
		AVIS CAR RENTAL	1	
		DEVONSHIRE CAR CARE CENTER INC	1	
		DTG OPERATIONS	1	
		DTG OPERATIONS INC/DOLLAR RENT-A-CAR DBA	1	
		DTG OPERATIONS INC/THRIFTY CAR RENTAL	1	
		ENTERPRISE RENT A CAR	3	
		FOX RENT A CAR INC	1	
		HERTZ RENT-A-CAR	1	
		PICTURE CAR WAREHOUSE, INC.	1	
		THE HERTZ CORPORATION	1	
		VANGUARD CAR RENTAL USA INC	1	
	532112	ALAMO RENT-A-CAR, NATIONAL CAR RENTAL	1	
	532120	DISPATCH TRANSPORTATION, LLC.	1	
		PENSKE TRUCK LEASING	1	
		U-HAUL INTL/AMERCO REAL ESTATE COMPANY	1	
		UNITED RENTALS	1	
	532220	ALLEN'S FORMAL WEAR INC	1	
		FRIAR TUX SHOPS, INC.	1	
		LUXURY FORMALWEAR	1	
	532230	CHEVRON USA INC SERV STA	1	
	532299	A RENTAL CONNECTION, LES SUMPSTER	1	
		ELMS EQUIPMENT RENTAL INC	1	
		ENVIRO SUPPLY & SERVICE, INC	1	
		UNITED RENTALS	1	
	532310	BAKER EQUIPMENT RENTALS	1	
	532412	CHAMPION CRANE RENTAL INC	1	
		SO CAL GAS CO	1	
		UNITED RENTALS NORTHWEST INC/BUENA PK BR	1	
	532490	AMERICAN RENTALS	1	
		AMERICAN RENTALS INC	1	
		CINELEASE INC	1	
		COMPLETE DESIGN SYSTEMS, INC	1	
		NATIONWIDE BOILER INC	1	
		NORTHRIDGE EQUIPMENT RENTALS CORP	1	
		OWL ENERGY RESOURCES INC	1	
		OWL ENERGY RESOURCES, INC	1	
		PANAVISION, INC.	1	
		UNITED RENTALS	1	
		UNITED RENTALS INC	2	
		UNITED RENTALS NORTHWEST INC	1	
		UNITED RENTALS NORTHWEST, INC	1	
		UNITED RENTALS, NORTHWEST INC.	1	
Rental and Leasing Services Total		49		

Commercial	Securities, Commodity Contracts, and Other Financial Investments and Related Activities			
	523000	618 INVESTMENT, INC.	1	
	523999	CONOCOPHILLIPS 251812.WESTGATE INVESTMEN	1	
		DEL AMO MILLS LIMITED PARTNERSHIP	1	
		GREKA OIL & GAS, INC	1	
		JNB INVESTMENTS, INC-PARAMOUNT	1	
		NEWPORT INVESTMENTS	1	
	Securities, Commodity Contracts, and Other Financial Investments and Related Activities Total		6	
	Telecommunications			
	517000	DP BROADBAND	1	
		LEVEL 3 COMMUNICATIONS LLC	2	
		LEVEL 3 COMMUNICATIONS, LLC	2	
	517110	CHARTER COMMUNICATIONS, INC	2	
		LA CO., ISD/NETWORK SERVICES DIVISION	1	
		VERIZON CA INC. ENVIRONMENTAL AFFAIRS	1	
	517212	T-MOBILE USA INC	1	
		VERIZON WIRELESS	1	
	517310	EQUANT	1	
		PACIFIC BELL, AT&T CALIFORNIA, DBA	1	
		PACIFIC BELL, AT&T CALIFORNIA DBA	1	
	PACIFIC BELL, AT&T CA, DBA	2		
	PACIFIC BELL, AT&T CALIFORNIA	2		
	PACIFIC BELL, AT&T CALIFORNIA, DBA	18		
	PACIFIC BELL, DBA AT&T	1		
	PACIFIC BELL, DBA AT&T CALIFORNIA	1		
	PACIFIC BELL,AT&T CALIFORNIA, DBA	2		
	SPRINT	2		
	VERIZON CALIFORNIA	2		
	VERIZON CALIFORNIA INC	5		
	XO COMMUNICATIONS - CALIFORNIA	1		
	XO COMMUNICATIONS INC (CA-24)	1		
	XO COMMUNICATIONS, INC	1		
517510	ADELPHIA CABLEVISION	2		
	TIME WARNER CABLE	2		
517910	U.S. TELEPACIFIC CORP	1		
Telecommunications Total		57		
Commercial Total		649		
Entertainment/Recreation	Amusement, Gambling, and Recreation Industries			
	713000	EATON CANYON GOLF COURSE	1	
		RENAISSANCE CLUB SPORT	1	
	713110	CEDAR FAIR LP, KNOTT'S BERRY FARM DBA	1	
		DISNEYLAND RESORT	1	
		LA LIVE, LLC	1	
		BRAEMAR COUNTRY CLUB	1	
		MARBELLA COUNTRY CLUB	1	
		TIC GOLF OPERATIONS INC	1	
		US GOVT, NAVY DEPT, GOLF COURSE	1	
	713930	ORANGE COUNTY, HARBOR EDINGER PUMP STN	1	
	713940	ALTADENA GOLF COURSE	1	
		CITY OF WALNUT, WALNUT TEEN CENTER/GYM	1	
		LA CITY DEPT OF AIRPORTS	1	
		LA CITY DWP, SANTA YNEZ P.S.	1	
		LA CITY,DEPT OF GEN SERVS,VALLEY PD HDQT	1	
		LA CO., DEPT. OF HEALTH SERVICES - ADMIN	1	
		OWL ENERGY RESOURCES, INC./24 HR FITNESS	1	
		OWL ENERGY RESOURCES,BALLY'S TOTAL FITN	1	
		RANCHO DUARTE GOLF COURSE/KUA INDUSTRY	1	
	THE CLAREMONT CLUB	1		
713990	BUTLER AMUSEMENTS, INC.	1		
	NORMANDIE CLUB	1		
	ORANGE, COUNTY OF - 32ND D A A,FAIRGRDS	1		

Entertainment/Recreation	713990	THE BICYCLE CASINO	1
		Amusement, Gambling, and Recreation Industries Total	24
Entertainment/Recreation Total			24
Heavy Industry	Chemical Manufacturing		
	325000	ARTESIA FERTILIZER	1
		MODERN MASTERS INC	1
		WATER & ENERGY SYSTEMS TECH DBA WEST INC	1
	325110	PRATT & WHITNEY ROCKETDYNE/RUBY ACQ ENT	1
	325113	LASCO BATHWARE INC.	1
		PLASTICOLOR MOLDED PRODUCTS, INC	1
		TECHMER P.M.	1
	325120	AIR PRODUCTS AND CHEMICALS, INC.	1
		BLUE RHINO OF LOS ANGELES	1
		PRAXAIR DISTRIBUTION, INC.	1
		PRAXAIR, INC.	1
	325131	SPECTRA COLOR INC	1
	325132	COLOR SCIENCE INC	1
	325188	CAL CARBON CO INC	1
		CALIFORNIA SULPHUR CO	1
		CARBON ACTIVATED CORPORATION	1
		CRITERION CATALYSTS & TECHNOLOGIES LP	1
		MARCHEM TECHNOLOGIES	1
		PHIBRO-TECH INC	1
		QUALITY CAR CARE PRODUCTS INC	1
		RHODIA INC.	1
		THE PQ CORP	1
		US BORAX INC	1
	325199	DIVERSIFIED SILICONE PRODUCTS INC	1
		PARAGON LABS, NATURAL LIFE ECO VITE LABS	1
		PARALLEL PRODUCTS	1
		PERFORMANCE ALUMINUM PRODUCTS	1
		SWEET OVATIONS	1
		TRITON DIAGNOSTICS	1
	325211	U HAUL INTERNATIONAL INC	1
		ACP NOXTAT, INC.	1
		AEP INDUSTRIES, INC. - WESTERN REGION	1
		BRIDGESTONE BANDAG, LLC	1
		CENTURY PLASTICS INC	1
		CROSSFIELD PROD. CORP	1
		HEXION SPECIALTY CHEMICALS, INC.	1
		HUNTSMAN ADVANCED MATERIALS AMERICAS INC	1
		INTERPLASTIC CORP	1
		MER-KOTE PRODUCTS, INC.	1
		NEVILLE CHEM CO	1
		PAINTED RHINO SPECIAL EFFECTS,R FRANKLIN	1
		PREMIER INDUSTRIES INC., INSULFOAM	1
		ROHM AND HAAS CHEMICALS LLC	1
		SA RECYCLING LLC DBA SA RECYCLING OF LA	1
		STEPAN CO GNRL	1
		STOROPACK INC	1
		TEKNOR APEX COMPANY, MACLIN DIVISION	1
		UNION OIL COMPANY OF CALIFORNIA (UNOCAL)	1
	325212	ARLON, MATERIALS FOR ELECTRONICS DIV	1
		INEOS POLYPROPYLENE LLC	1
	325314	DESERT SOLUTIONS, INC.	1
	325411	LEINER HEALTH PRODUCTS, LLC	1
		ONE LAMBDA INC	1
		PHARMAVITE LLC	2
		SUNRIDER MANUFACTURING, LP	1
	325412	3M DRUG DELIVERY SYSTEMS	1
		ALCON RESEARCH, LTD.	1
		ALLERGAN INC	1
		ARCOMIG, INC.	1
		GILEAD SCIENCES INC	1
		INTERNATIONAL MEDICATION SYSTEMS LTD	1
		SOFTGEL TECHNOLOGIES, INC	1

Heavy Industry	325412	TEVA PARENTERAL MEDICINES, INC	1
		WATSON LABORATORIES	1
		WATSON LABORATORIES, INC	1
		WATSON LABORATORIES, INC.	2
	325414	BACHEM INC	1
		BACHEM INC.	1
	325510	ADVANCED CHEMISTRY AND TECHNOLOGY	1
		ADVANCED PACKAGING & PRODUCTS CO	1
		AKZO COATINGS INC.	1
		BEHR PROCESS CORP	1
		BEHR PROCESS CORPORATION	1
		BENJAMIN P. MICHEL	1
		CATALINA INDUSTRIES INC.	1
		COCA-COLA BOTTLING CO OF SOUTHERN CALIF.	1
		DEFT INC	1
		EPMAR CORP	1
		LIFE PAINT CO	1
		NORTON & SON OF CAL INC	1
		PINNACLE PRECISION SHEET METAL CORP.	1
		SPECIALTY FINISHES CO	1
		SUPERIOR SANDBLASTING & COATINGS	1
		THE SHERWIN-WILLIAMS CO.	1
		VALSPAR INDUSTRIES (USA) INC	1
	325520	BLAIR ADHESIVE PROD.	1
		CUSTOM BUILDING PRODUCTS	1
		CYTEC ENGINEERED MATERIALS INC	1
		GARDNER-GIBSON	1
		GENERAL SEALANTS, INC	1
		IPS CORPORATION	1
		NEW/PORT ADHESIVES & COMPOSITES INC	1
		U-HAUL INTERNATIONAL INC	1
	325611	ECOLAB, INC.	1
		PACKAGING ADVANTAGE CORP	1
		PILOT CHEMICAL CO	1
	325613	PLAYA CAPITAL COMPANY LLC	1
	325620	BOCCHI LABORATORIES, INC.	1
		COSMETIC ENTERPRISES LTD	1
		COSMETIC LABORATORIES OF AMERICA	1
		KIK AEROSOL SOCIAL LLC	1
		LEVLAB, LLC	1
		NEUTROGENA CORP	1
		OPI PRODUCTS, INC	1
		PURETEK CORPORATION	1
		THIBIANT INTERNATIONAL INC	1
		TU-K INDUSTRIES INC	1
		UNIVERSAL PACKAGING SYSTEMS, INC	1
	325910	US INK CORPORATION	1
	325998	AIR PROD & CHEM INC	1
		AMERICAN POLYMER CORP, POLYCOAT PRODUCTS	1
		SANITOR CORPORATION	1
		SIKA CORP	1
		URETHANE POLYMER INTERNATIONAL INC	1
Chemical Manufacturing Total			116
	Computer and Electronic		
	Product Manufacturing		
	334000	ITT BARTON/PRIME MEASUREMENTS SYSTEMS	1
		TAKANE USA	1
	334112	J.M.R. ELECTRONICS INC	1
		STEC, INC.	1
	334119	EXTRON ELECTRONICS	1
		PRINTRONIX, INC.	1
	334220	BOEING SATELLITE SYSTEMS, INC	1
		M/A-COM, INC.	1
		NOVAK RACING ELECTRONICS	1
		ROCKWELL COLLINS PASSENGER SYSTEMS	1
		SPIRENT COMMUNICATIONS, INC.	1
		TRIVEC AVANT	1

Heavy Industry	334290	H&S IRONWORKS	1
		SAFETRON SYSTEMS CORP,ELECTRONIC DIV	1
		SEMI-KINETICS, INC	1
	334310	RENKUS HEINZ	1
	334411	RAYTHEON COMPANY	1
	334412	ACCURATE ENGINEERING CORP	1
		ALMATRON ELECTRONICS, INC.	1
		AMBAY CIRCUIT, INC., DVH CIRCUITS DBA	1
		GOLDEN WEST TECHNOLOGY	1
		GRAPHIC RESEARCH INC	1
		IRVINE ELECTRONICS INC	1
		MARCEL ELECTRONICS	1
		NATEL ENGINEERING CO INC	1
		NORDGEAR CORP	1
		PIONEER CIRCUITS INC	1
		SANMINA-SCI CORPORATION	1
		SIEMENS MEDICAL SOLUTIONS USA, INC	1
		SOLDER MASK, INC	1
		SOUTH COAST CIRCUITS INC	1
		TTM TECHNOLOGIES INC	1
		TTM TECHNOLOGIES, INC	1
		VALLEY CIRCUITS,DBA,VALLEY SYNCOM CIR.	1
		VELIE CIRCUITS INC	1
	334413	BROADCOM CORP	1
		GLOBAL COMMUNICATION SEMICONDUCTORS INC.	1
		INTERNATIONAL RECTIFIER H	1
		NEWPORT FAB, LLC	1
		SPECTROLAB INC	1
	334414	AUTON MOTORIZED SYSTEMS	1
		CORNELL-DUBILIER ELECTRONICS, INC	1
	334419	BAE SYSTEMS	1
		CIRCUIT MFG INC	1
		CITY OF LA, BOS,WASTEWATER COLL SYS DIV	1
		DATA CONNECTION SOLUTIONS	1
		ELECTORACK PRODUCTS INC	1
		EXPRESS MANUFACTURING INC	1
		EXPRESS MANUFACTURING, INC.	1
		JOHANSON DIELECTRICS INC	1
		KERR CORPORATION/DENTAL MATERIALS CENTER	1
		LIGHTCROSS INC	1
		MIKHAIL DARAFEEV, INC.	1
		POWER PARAGON	1
		SORA POWER INC	1
		STATEK CORPORATION	1
	334510	KLM LABORATORIES INC	1
		SPECIALTY COFFEE LLC	1
		ST. JUDE MEDICAL CRMD	1
	334511	BAE SYSTEMS CONTROLS	1
		ROGERSON- KRATOS,INC	1
	334512	BOSTON SCIENTIFIC	1
	334513	MOORE IND INC	1
		VACUUM METALIZING CO	1
	334515	APOLLO ENERGY III	1
	334516	BECKMAN COULTER INC	1
		BECKMAN COULTER, INC.	1
		QUEST DIAGNOSTICS INC	1
	334612	L & M OPTICAL DISC WEST LLC	1
	Computer and Electronic Product Manufacturing Total		69
	Construction of Buildings		
	236115	HINERFELD WARD, INC.	1
		PACIFIC STATES ENV CONTRACTORS INC	1
	236118	PACIFIC COAST KITCHENS & DESIGN INC	1
	236200	MISSION FOODS CORPORATION	1
	236210	CONNOLLY-PACIFIC CO	2
		DIVECON SERVICES, LP	1
	236220	BEST QUALITY AUTO BODY & PAINT	1
		C C ENTERPRISES, FRANK T PRIETO	1

Heavy Industry	236220	NIKRAD ENTERPRISES INC #1	1
		NIKRAD ENTERPRISES INC #5	1
		VERIZON WIRELESS	1
	Construction of Buildings Total		12
	Electrical Equipment, Appliance, and Component Manufacturing		
	335000	HAMOND POWER SOLUTIONS, INC	1
	335121	BRASS REPRODUCTIONS	1
		DELTA LIGHTING SYSTEMS INC	1
		LIGHTOLIER INC	1
		LIGHTS OF AMERICA INC	1
		LYNAM INDUSTRIES INC	1
		TROY - CSL LIGHTING, INC.	1
	335122	BASELITE CORP	1
		EVERGREEN LIGHTING INC	1
		SPECTRUM LIGHTING	1
		TRITON CHANDELIER INC	1
	335129	MAG INSTRUMENT, INC	1
		SUREFIRE LLC	1
	335228	MYERS POWER PRODUCTS INC	1
	335312	ATK SPACE SYSTEMS	1
		HITACHI AUTOMOTIVE PRODUCTS (USA) INC.	1
		NEW CINGULAR WIRELESS PCS, LLC	1
	335314	TELEDYNE TECH INC, TELEDYNE RELAYS	1
	335911	L-3 COMMUNICATIONS ELECTRON TECH INC	1
		SPECTRUM BRANDS	1
		TELEDYNE CONTINENTAL MOTORS	1
		TROJAN BATTERY CO	1
	335921	WHITMOR/WIRENETICS,WHITMOR PLAS WIRE&CAB	1
	335931	DATA SOLDER INC	1
		LIGHTNING DIVERSION SYSTEMS	1
		PRECISION STAMPINGS, INC.	1
		TRI-STAR ELECTRONICS INTERNATIONAL INC	1
	335932	SORENSEN ENGINEERING INC, FRANK SORENSON	1
	Electrical Equipment, Appliance, and Component Manufacturing Total		28
	Fabricated Metal Product Manufacturing		
	332000	A&A PLATING COMPANY	1
		AMFI, TK SYSTEMS DBA	1
		ANDREWS POWDER COATING INC	1
		ANGELES WELDING & MFG CO	1
		ARTISTIC WELDING WORK SHOP	1
		CALIFORNIA CUSTOM POWDER COATING	1
		CV ORNAMENTAL WROUGHT IRON, INC.	1
		DURACOAT POWDER COATING	1
		EDGAR IRON WORKS & LLV IRON WORKS	1
		EMPIRE ORNAMENTAL IRONWORKS	2
		GABRIEL'S WROUGHT IRON INC	1
		GLOMAR POWDER COATING CO INC	1
		GOLDEN GATE IRON WORKS, INC.	1
		GOMEZ SANDBLASTING	1
		HECTORS WELDING AND IRON WORKS	1
		HUBBARD IRON DOORS	1
		INDUSTRIAL ABRASIVE BLASTING AND COATING	1
		INDUSTRIAL COATING & COIL INC	1
		J & J IRON AND ORNAMENTAL WORK	1
		JR POWDER COATING	1
		K S WELDING	1
		KEYSTONE AUTOMOTIVE INDUSTRIES, INC.	1
		MACIAS IRON WORKS	1
		MARKET FIXTURES UNLIMITED, INC.	1
		MASTER POWDER COATING	1
		MENDOZA IRON WORKS	1
		NATIONAL METAL FABRICATION, J. DELVILLAR	1
		PACIFIC COATINGS,FRANCIS BART PANTON DBA	1

Heavy Industry	332000	PACIFIC INDUSTRIAL SERVICES INC	1	
		PAINTING & STRIPPING & COATINGS, INC.	1	
		POWDER COATING LTD	1	
		PRS INDUSTRIES	1	
		QUALITY COATING INC	1	
		RAM FINISH CORP.	1	
		SOUTH BAY POWDER COATS	1	
		TNT WELDING INC.	1	
		332111	AJAX FORGE CO	1
		FANSTEEL/CALIFORNIA DROP FORGE	1	
		FORGED METALS INC	1	
		PACIFIC FORGE INC	1	
		332112	VALLEY FORGE ACQUISITION CORP	1
		ALUM-ALLOY CO INC	1	
		CARLTON FORGE WORKS	1	
		CONTINENTAL FORGE CO	1	
		LINDSEY MANUFACTURING CO	1	
		PRESS FORGE CO	1	
		SHULTZ STEEL CO	1	
		WEBER METALS INC	1	
		332116	ACCURATE METAL FABRICATORS INC	1
		332311	ALLIED MODULAR BUSINESS SYSTEMS	1
		332312	A & G ELECTROPOLISH	1
		A C POWDER COATING	1	
		AGGRESSIVE ERECTORS & BRIDGEMEN INC	1	
		TAMCO	1	
		332313	AMERON STEEL FABRICATION DIVISION	1
		CORRUGATED ROLLER & MACHINE INC	1	
		HARDY FRAMES INC	1	
		ROY E. HANSON JR MFG CO	1	
		STEEL FORMING, INC	1	
		STRUCTURAL COMPOSITES IND	1	
		SUPERIOR TANK CO., INC	1	
		SUPERIOR TANK COMPANY INC	1	
		332321	L & L LOUVERS INC	1
		LAWRENCE ROLL UP DOORS INC	1	
		R.C. SHUTTERS	1	
		332322	A P W	1
		ADVANCED IRON CONCEPTS	1	
		CARLISLE TIRE & WHEEL COMPANY	1	
		CONCEPT POWDER COATING, INC	1	
		DOOR COMPONENTS	1	
		ERC CO	1	
		GRAPHIC FINISHES, BENITO A PEDRAZA DBA	1	
		LEOVARDO POWDER COATING, LEOVARDO ROMAN	1	
		PACIFIC METAL POWDER COATING	1	
		POWDERCRAFT, MARCILLE LE FEBRE	1	
		PRECISE INDUSTRIES, INC.	1	
		SANDFROG LLC	1	
		SPRAY ENCLOSURE TECHNOLOGIES, INC	1	
VALLEY PRECISION METAL PROD & VALLEY ENG	1			
VERSA PRODUCTS, INC.	1			
332323	5 STAR WROUGHT IRON	1		
HI STYLE METAL DESIGN, AKOP PISIKYAN DBA	1			
KING IRON WORKS	1			
NOEL SHARPENING & WELDING CENTER	1			
ORNAMENTAL IRON CONCEPT, BARTOLOME FLUXA	1			
PROFESSIONAL IRON WORKS	1			
RODRIGUEZ ORNAMENTAL IRON WORKS	1			
STAR ORNAMENTAL IRON WORKS	1			
UNION PACIFIC RAILROAD	1			
332420	PACIFIC STEAM EQUIPMENT INC	1		
332431	BALL METAL BEVERAGE CONTAINER CORP.	1		
CONTAINER SUPPLY CO INC	1			
REXAM PLC, REXAM BEVERAGE CAN COMPANY	1			
SENIOR AEROSPACE SSP	1			
332439	INDUSTRIAL CONTAINER SERVICES-CA LLC	1		
LOUD ENGINEERING & MFG INC	1			

Heavy Industry	332439	MDS PRECISION FABRICATION INC	1	
		MYERS CONTAINER CORP, DIV OF IMACC	1	
		SPECTRUM PAINT & POWDER, INC.	1	
		STANDARD METAL PRODUCTS, INC	1	
		332510	A FINE TOUCH OF WOOD	1
		EMTEK	1	
		K & W MANUFACTURING CO INC	1	
		PENN ELCOM, INC	1	
		332611	EIBACH SPRINGS	1
		332618	METAL BRIQUETTING COMPANY	1
		PHOENIX WEST STABLE PRODUCTS & ENGRAVING	1	
		332710	INTEGRATED AEROSPACE	1
		NELSON ENGINEERING INC	1	
		TRUMPHE STRUCTURES - LOS ANGELES	1	
		332721	HI-SHEAR CORPORATION	1
		WEST COAST AEROSPACE	1	
		332722	ALCOA GLOBAL FASTENERS, INC.	1
		ALCOA GLOBAL FASTENERS, INC. SOUTH BAY	1	
		ALCOA GLOBAL FASTENERS, INC./COI-UNRUH	1	
		AVK INDUSTRIAL PRODUCTS	1	
		HUCK INTERNATIONAL INC	1	
		MS AEROSPACE INC	1	
		SHUR-LOK CORP	1	
		332811	VALLEY-TODECO, INC	1
		ACCURATE STEEL TREATING INC	1	
		AEROCRAFT HEAT TREATING C	1	
		ASTRO ALUMINUM TREATING CO INC	1	
		BODYCOTE THERMAL PROCESSI	1	
		BODYCOTE THERMAL PROCESSING	3	
		CONTINENTAL HEAT TREATING INC	1	
		LA MIRADA ALUMINUM HEAT TREAT, LLC	1	
		METAL IMPROVEMENT CO	1	
		TEAM INDUSTRIAL SERVICES	1	
		332812	THERMAL VAC TECHNOLOGY	1
		A TO Z COATING	1	
		ABACUS POWDER COATING	1	
		ADVANCED FINISHING SYSTEMS	1	
		ADVANCED POWDER COATING, INC.	1	
		ALERT PLATING COMPANY	1	
		ARNACO POWDER COATING CO., INC	1	
		BRISTOL INDUSTRIES	1	
		C & J ENGRAVERS	1	
		C R LAURENCE COMPANY, INC	1	
		CALIFORNIA CUSTOM SHAPES	1	
		CENTRAL POWDER COATING, J & A CANTARINI	1	
		COAST TO COAST METAL FINISHING CORP	1	
		CUSTOM ENAMELERS INC	1	
		D&M AUTOMOTIVE LLC	1	
		ELECTRON PLATING III	1	
		FTG CIRCUITS	1	
G & M POWDER COATING	1			
GEMTECH IND. GOOD EARTH MFG INC	1			
HEZZY POWDER COATING INC	1			
HINO MOTORS MANUFACTURING USA, INC	1			
INDUSTRIAL COATING & COIL INC	1			
JAN-KENS ENAMELING CO INC	1			
JR'S PROFESSIONAL FINISHING	1			
L & P PROPERTY MANAGEMENT CO	1			
LEAL POWDER COATING EXPRESS	1			
LOS ANGELES GALVANIZING CO	1			
MAXIMUM POWDER COATING LLC	1			
MIIBEC POWDERCOATING, INC	1			
NU-TEC POWDER COATING	1			
OLYMPIC COATINGS	1			
OR. CO. PAINTING	1			
OR. CO. PLATING CO INC	1			
OUR POWDER COATING	1			
PACIFIC UTILITY PRODUCTS, INC.	1			

Heavy Industry	332812	PERFORMANCE POWDER INC	1
		POWDERCOAT PROFESSIONALS INC	1
		POWDERCOATING SPECIALTIES	1
		PRECISION METAL FINISHING CO	1
		PRECISION POWDER COATING INC.	1
		PRECOR, INC.	1
		PRO IRON WORK/ F & B, INC.	1
		PRS INDUSTRIES	2
		PYRAMID POWDER COATING	1
		QSC AUDIO PRODUCTS, INC.	1
		R & R COATINGS	1
		RAINBOW COATINGS, INC.	1
		RAINN C POWDER COATING INC.	1
		RGF ENTERPRISES INC	1
		SHAWCOR PIPE PROTECTION LLC.	1
		SPECIALIZED POWDER COATING	1
		SUNDIAL INDUSTRIES INC	1
		TREND TECHNOLOGIES LLC	1
		V & J POWDER COATINGS, INC	1
		VALLEY ENAMELING CORP	1
		VALMONT COATINGS, CALWEST GALVANIZING	1
		WESTERN METAL DECORATING CO	1
		X.O. IRON WORKS, WILLIAM K. LO DBA	1
		A & B SANDBLAST CO	1
		AAA PLATING & INSPECTION, INC	1
		ACCURATE ANODIZING, INC	1
		AIRCRAFT X-RAY LABS INC	1
		ALL METALS PROCESSING OF ORANGE CO INC	1
		AMERICAN RACING EQUIPMENT INC	1
		ANADITE INC	1
		ANAHEIM PLATING INC	1
		ANAPLEX CORP	1
		ANO BRITE INC	1
		ANODIZING INDUSTRIES, INC.	1
		ANODYNE INC	1
		ARTISTIC PLATING & METAL FINISHING INC	1
		AUTOMATION PLATING CORP	1
		AUTOMATION PLATING CORP.	1
BD & G SANDBLASTING CO	1		
BEO-MAG PLATING INC	1		
BLACK OXIDE ENTERPRISES, INC.	1		
BOWMAN PLATING CO INC	1		
BRONZEWAY PLATING CORP	1		
BURBANK PLATING SERVICE CORP	1		
CAL AURUM IND	1		
CAL-TRON PLATING INC	1		
CEMCOAT INC	1		
CHROMAVISION MEDICAL SYSTEMS, INC	1		
CHROMETECH INC	1		
CIRCUIT SERVICES LLC	1		
CLASSIC COMPONENTS INC	1		
CRISOL METAL FINISHING	1		
DANCO METAL SURFACING	1		
E.M.E. INC/ELECTRO MACHINE & ENGINEERING	1		
ELECTROLURGY INC	1		
EMBEE INC	1		
FINE QUALITY METAL FINISHING CO	1		
FONTANA POLISHING AND PLATING	1		
GORILLA'S POLISHING & PLATING CORP	1		
HARD CHROME PLATING INC	1		
HIGHLAND PLATING CO	1		
JENCO PLATING & ANODIZING INC	1		
MAGMA FINISHING CORPORATION	1		
MAGMA FINISHING INC	1		
MAXIMA ENTERPRISES, INC.	1		
METAL CHEM	1		
METAL SURFACES INC	1		
MORRELL'S ELECTRO PLATING, INC	1		

332813

Heavy Industry	332813	NEUTRON PLATING INC	1		
		OPTI-FORMS, INC.	1		
		PEMACO METAL PROCESSING CORP	1		
		PRECIOUS METALS PLATING CO	1		
		QUAKER CITY PLATING & SILVERSMITH LTD	1		
		SABRITEC	1		
		SEKISUI TA INDUSTRIES, LLC	1		
		SEVEN S POWDER COATINGS	1		
		SIGMA PLATING CO INC	1		
		SPENCE ELECTRO PLATING CO	1		
		STUTZMAN PLATING CO	1		
		SUGAR FOODS CORP.	1		
		SUNVAIR COATING TECH., A-H PLATING INC	1		
		ULTIMATE METAL FINISHING CORP.	1		
		VALLEY PLATING WORKS INC	1		
		VALLEY PLATING WORKS, INC	1		
		WHITING ENTERPRISES, INC.	1		
		WHITTAKER CONTROLS INC	1		
		332911	GRISWOLD INDUSTRIES	1	
		332912	BRASSTECH INC	1	
		332913	BAKER COUPLING CO INC	1	
		332919	BLOOMFIELD BAKERS	1	
			CLOW VALVE CO	1	
			COAST COATINGS LLC	1	
		332991	U.S. HANGER COMPANY, LLC	1	
		332995	ARMTEC DEFENSE PROD. CO	1	
		332996	ACTIVAR COMPANIES INC,AIR LOUVERS/SAMSON	1	
			AEROFIT, INC.	1	
			ARCHITECTURAL ANTIQUES WEST	1	
			CANAY MFG., POWDER COATING PLUS, DBA	1	
			PATIO OUTLET	1	
			PERFORMANCE POWDER, INC	1	
			RBC TRANSPORT DYNAMICS CORP	1	
			WESTERN PACIFIC STORAGE SYSTEMS, INC.	1	
		332998	ELKAY CALIFORNIA PLUMBING PRODUCTS INC	1	
		332999	AMERICAN SECURITY PRODUCTS CO INC	1	
			BLUE DOT SAFES	1	
			GOLDEN WEST REFINING CO	1	
			SUN BADGE CO	1	
			V-T WEST, INC. CALIFORNIA DIV.	1	
		Fabricated Metal Product Manufacturing Total		276	
		Heavy and Civil Engineering			
		Construction			
			237110	MLADEN BUNTICH CONSTRUCTION CO INC	1
				YORBA LINDA WATER DISTRICT	1
			237120	CONOCOPHILLIPS COMPANY	1
				EXXONMOBIL OIL CORPORATION	2
			237130	SHAW DIVERSIFIED SERVICES INC	1
			237210	7-ELEVEN INC #32938/NAVDEEP BASSI-FRANCH	1
				ASHDON DEVELOPMENT, INC.	1
				DOUGLAS EMMETT 1996 LLC	1
				MAGUIRE PROPERTIES - 701 N. BRAND LLC	1
				WATERMAN PROPERTIES, INC.	1
			237310	ALL AMERICAN ASPHALT	2
				ALL AMERICAN ASPHALT, UNIT NO.01	1
				ALL AMERICAN SERVICE & SUPPLIES	1
				CORONET CONCRETE PROD, DESERT REDDI MIX	1
		EXCEL PAVING CO INC	1		
		ENTRY BROS INC	1		
		GRANITE CONSTRUCTION CO	1		
		GRANITE CONSTRUCTION COMPANY	1		
		HILLCREST CONTRACTING	1		
		MATICH CORP	1		
		PAVEMENT RECYCLING SYSTEMS, INC	1		
		PAVEMENT RECYCLING SYSTEMS, INC.	1		
		ROMERO GENERAL CONSTRUCTION CORPORATION	1		
		SHAMROCK BASE CORPORATION	1		

Heavy Industry	237310	SKANSKA USA CIVIL WEST CA DISTRICT INC	1
		SULLY MILLER CONTRACTING CO	1
	237900	TRAYLOR FRONTIER - KEMPER, J.V.	1
	237990	EI COLTON, LLC	1
Heavy and Civil Engineering Construction Total			30
Machinery Manufacturing			
	333000	DAVRIK SYSTEMS INC DBA FOOD MAKERS EQUIP	1
		GODWIN PUMPS	1
		SENKO INC	1
		VALLEY POWER SYSTEMS, INC.	1
	333210	KRP MANUFACTURING, INC	1
	333291	ELLISON EDUCATIONAL EQUIPMENT INC	1
	333294	DAVRIK SYS, INC FOOD MAKERS EQUIP ,DBA PURATOS CORPORATION	1
	333298	ADVANCED POWDER COATING, INC.	1
	333314	PVP ADVANCED EO SYSTEMS INC	1
	333315	MOLE-RICHARDSON CO	1
	333319	CONTROL COMPONENTS INC	1
		JWC ENVIRONMENTAL INC	1
		RANCHO CALIFORNIA WATER DISTRICT	1
		YARDNEY WATER MANAGEMENT SYSTEMS INC	1
	333411	CAMERON ENVIRONMENTAL INC	1
	333414	ROBERT H. PETERSON CO	1
		SUNEARTH INC	1
	333415	ANTHONY, INC.	1
		HUSSMANN CORP	1
	333511	LA GAUGE COMPANY	1
		SWIFT-COR PRECISION INC	1
	333512	JOHN ZINK CO, LLC	1
	333514	CHARLES MEISNER INC	1
		US STEEL RULE DIES, INC.	1
	333515	LRH ENTERPRISES, INC	1
		MATRIX STONE PRODUCTS	1
		SAINT-GOBAIN ABRASIVES, INC	1
	333518	BMCI INC/BERGANDI MACHINERY CO DBA RAH INDUSTRIES, INC.	1
		FERNANDO NUNEZ	1
	333611	HUB CITY INC	1
	333613	TA PUMP SALES & SERVICE INC	1
	333911	ANGELUS MANUFACTURING	1
	333924	PARAMOUNT TANK, INC.	1
		TAYLOR-DUNN MFG CO	1
	333994	GEIL INDUSTRIES, GEIL KILNS DBA	1
	333999	C. K. "BUD" MYERS ENGINEERING INC	1
		FMH INVESTOR GROUP, LLP, FMH CORP	1
		MARTINEZ FINISHING	1
		PACIFIC CONSOLIDATED INDUSTRIES	1
		UNIVERSAL MOTION COMPONENTS INC	1
Machinery Manufacturing Total			42
Mining (except Oil and Gas)			
	212000	HANSON AGGREGATES WEST INC/INLAND ROCK	1
		TRANSAMERICAN SOIL SERVICES INC	1
	212234	O N I S, DBA CARMENUSE INDUSTRIAL SAND	1
	212311	CHANDLER AGGREGATES INC	1
	212312	EMPIRE ROCK INC	1
		ORTIZ ENTERPRISES INC	1
		UNITED ROCK PRODUCTS CORPORATION	1
	212321	A-1 AGGREGATES INC	1
		AZUSA ROCK INC	1
		CALMAT CO	2
		CALMAT CO., DBA VULCAN MATERIALS CO.WES.	1
		EL TORO MATERIALS CO.	1
		VULCAN MATERIALS CO., CALMAT DIVISION	1
		WEST COAST AGGREGATE SUPPLY, INC	1
	212322	O N I S, DBA, CARMUSE INDUSTRIAL SANDS	1

Heavy Industry	Mining (except Oil and Gas) Total		16
	Nonmetallic Mineral Product Manufacturing		
	327000	ABRASIVE BLASTING SERVICE	1
		CREATIVE ELEGANCE, INC	1
		PACIFIC READY MIX, INC.	1
		SANS SOUCIE ART GLASS STUDIOS, INC	1
	327112	CERADYNE INC	1
		CERADYNE, INC.	1
		GAINEY CERAMICS INC	1
	327121	CASTAIC CLAY PRODUCTS, LLC	1
		HIGGINS BRICK CO	1
	327122	NET SHAPES, INC.	1
	327123	MARUHACHI CERAMICS OF AMERICA INC	1
		US TILE CO	1
	327212	C.J. FIBERGLASS	1
	327213	HEAD WEST INC	1
		SAINT-GOBAIN CONTAINERS, INC.	1
	327300	A & A READY MIXED CONCRETE INC	1
		ASSOCIATED READY MIXED CONCRETE	1
		INLAND CONCRETE PUMPING/MERLI CONCRETE P	1
		SANDMASTER, INC	1
	327310	CALIFORNIA PORTLAND CEMENT CO (NSR USE)	1
		CALIFORNIA PORTLAND CEMENT CO.	1
		HEADWATERS CONSTRUCTION MATLS UTAH, INC	1
		LATICRETE INTERNATIONAL INC	1
		RIVERSIDE CEMENT CO (EIS)	1
	327320	A-1 GRIT COMPANY	1
		A-1 SPECIALTY ROCK PRODUCTS	1
		ASSOCIATED READY MIXED CONCRETE, INC.	1
		BONANZA CONCRETE INC	1
		CALAVERAS STANDARD MATERIALS, INC	1
		CALIFORNIA PORTLAND CEMENT CO.	1
		CALMAT CO	1
		CEMEX CONSTRUCTION MATERIALS PACIFC,LLC.	1
		CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	1
		FIXATION SYSTEMS LLC	1
		FOURTH STREET ROCK	1
		HANSON AGGREGATES WEST INC	1
		HANSON AGGREGATES WEST INC/IRWINDALE ROC	1
		HOLLIDAY TRUCKING, INC	2
		NATIONAL READY MIXED CONCRETE CO, DBA	1
		NATIONAL READY MIXED CONCRETE COMPANY	1
		PARAGON BUILDING PRODUCTS	1
		PUESTE READY MIX INC	1
		RANCHO READY MIX	1
		ROBERTSON READY MIX	1
		ROBERTSON'S READY MIX	3
		ROBERTSON'S READY MIX INC	1
		ROBERTSON'S READY MIX, L.P.	1
		ROBERTSON'S READY MIX, PLANT # 20	1
		STANDARD CONCRETE PRODUCTS INC	2
		SUPERIOR READY MIX	1
		SUPERIOR READY MIX CONCRETE, L P	1
		SUPERIOR READY MIX, L P	1
	327331	ANGELUS BLOCK CO INC	1
		CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	1
		MATICH CORP	1
		MONIERLIFETILE LLC	1
		ORCO BLOCK CO INC	2
		ORCO BLOCK CO.	1
		QUIKRETE OF SOUTHERN CALIFORNIA	1
		ROBERTSONS READY MIX, MURRIETA PLANT #27	1
		ROBERTSON'S READY MIX, PLANT #26	1
		WESTERN STATES WHOLESale INC	1
	327332	CALAVERAS STANDARD MATERIALS INC.	1
		CALAVERAS/STANDARD MTRLS. INC, CHINO REA	1

Heavy Industry	327332	JOHNSON-BATEMAN CO	1
		RINKER MATERIALS CORP, HYDRO CONDUIT DIV	1
	327390	AVILA'S GARDEN ART	1
		CLARK PACIFIC	1
		GEORGE L. THROOP COMPANY	1
		HEADWATERS RESOURCES, INC	1
		JENSEN PRECAST	1
		NEW BASIS	1
		NEWMAN & SONS INC	1
		OVER AND OVER READY MIX, INC	1
		POMEROY CORPORATION	1
		QUIKRETE CORP OF SOUTHERN CALIF	1
		RIALTO CONCRETE PRODUCTS INC	1
		UTILITY VAULT CO., INC.	1
	327420	G-P GYPSUM CORP	1
		OMEGA PRODUCTS CORP.	1
	327910	BOSTIK INC	1
		RMS FINISHING, INC.	1
	327991	M V CULTURED MARBLE, JULIA TRAN DBA	1
		POLYVISION, A STEELCASE CO	1
		UNITED MEMORIAL PRODUCTS INC	1
	327992	GREEN ARM CO LTD - TOKYO, JAPAN	1
		HOLLIDAY ROCK CO., INC	1
		REDCO II	1
		SGL TECHNIC INC, POLYCARBON DIVISION	1
327999	ALKEN INDUSTRIES	1	
	CERADYNE, INC, DAIMLER FACILITY	1	
	PARAGON BUILDING PRODUCTS	1	
	THERMAL STRUCTURES INC	1	
	URBAN ART STUDIO, TAO BERNARDUS URBAN	1	
Nonmetallic Mineral Product Manufacturing Total			99
Oil and Gas Extraction			
211000	AL SAL OIL CO/S & N OIL COMPANY	1	
	BELLFLOWER SOMERSET MUTUAL WATER CO	1	
	BREITBURN OPERATING L.P.	1	
	BREITBURN OPERATING LP	1	
	CHEVRON CORPORATION	1	
	CHEVRON ENVIRONMENTAL MANAGEMENT CO.	1	
	CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY	2	
	CHEVRON ENVIRONMENTAL MGMT CO	2	
	CHEVRON PRODUCTS CO, STA # 30-6957	1	
	DCOR LLC	1	
	E & T, LLC	1	
	OIL OPERATORS INC/BUTLER LEASE	1	
	SHERWIN D. YOELIN	1	
	SOUTH COAST OIL CORP. (S.C.O.C. HB-1)	1	
	SUBURBAN WATER SYSTEMS	1	
	THE FARM MUTUAL WATER COMPANY	1	
	VINTAGE PRODUCTION CALIFORNIA LLC	1	
	WARREN E & P, INC.	1	
211110	AGOURA HILLS TEXACO INC.	1	
	BREITBURN OPERATING LP	1	
211111	AERA ENERGY LLC	1	
	ANGUS PETROLEUM CORP	1	
	ARCO #09505 - TAFTAN INC	1	
	ARCO FAC #00076 - BINIT CORPORATION	1	
	ARCO FAC #05027, BP WEST COAST PRODS LLC	1	
	ARCO FAC #06060-I&S MINI MARKET	1	
	ARMSTRONG PETR CORP	1	
	AXIS PETR CO	1	
	BENTLEY SIMONSON, INC	1	
	BENTLEY-SIMONSON INC	1	
	BERCO OIL CO LLC	1	
	BP WEST COAST PRODUCTS LLC	1	
	BP WEST COAST PRODUCTS LLC/ MARINE TER 1	1	
	BRAYTON-HODGES PETROLEUM INC	1	
	BREA CANON OIL CO	1	

Heavy Industry	211111	BREA CANON OIL COMPANY INC	1
		BREITBURN ENERGY CO LLC	2
		BREITBURN ENERGY CO, LLC	1
		BREITBURN ENERGY COMPANY, LLC	3
		BREITBURN ENERGY CORP	1
		BRIDGEMARK CORPORATION	1
		COOPER & BRAIN BREA	1
		COOPER & BRAIN, T. I. T. LEASE	1
		COOPER AND BRAIN INC	1
		CRIMSON RESOURCE MANAGEMENT	1
		EXXONMOBIL DLR.GREGG HAMMORK #18-ADR	1
		EXXONMOBIL OIL CORPORATION,18-NJD,#10181	1
		FOUR TEAMS OIL PRODUCTION, INC	1
		GARG-OIL PRODUCTION LLC	1
		GRANER OIL CO/BIG BEAR #4	1
		GRANER OIL CO/DARBY & MEADER	1
		GRANER OIL CO/FOSTER	1
		GRANER OIL CO/LOFTUS #1	1
		GRANER OIL CO/MCEVOY & O'DONNELL	1
		GRANER OIL COMPANY	1
		HELLMAN PROPERTIES LLC	1
		JEAN MARTINEZ USL #1	1
		M & J OPERATORS	1
		P & M OIL CO	1
		PACIFIC ENERGY RESOURCES	2
		PATRIOT RESOURCES CORPORATION	1
		PLAINS EXPLORATION & PROD	1
		PLAINS EXPLORATION & PRODUCTION CO	1
		PLAINS EXPLORATION AND PRODUCTION CO	2
		SIGNAL HILL PETROLEUM INC	1
		SOUTH COAST OIL CORP	1
		SOUTH COAST OIL CORPORATION	1
		STOCKER RESOURCES, INC	1
		T B PROPERTIES	1
		TERMO COMPANY	1
		THE TERMO CO	1
		THUMS LONG BEACH	1
		THUMS LONG BEACH CO	2
		THUMS LONG BEACH CO, UNIT NO.02	1
		THUMS LONG BEACH CO, UNIT NO.05	1
		TIDELANDS OIL PRODUCTION COMPANY	1
		TIDELANDS OIL PRODUCTION COMPANY ETAL	1
		TIDELANDS OIL PRODUCTION COMPANY, ETAL	1
		VINTAGE PETROLEUM INC, DEL VALLE OIL FLD	1
		WILLIAM K. VOGT, PIER OIL CO DBA	1
211112	MATRIX OIL CORPORATION - HONOLULU TERRAC	1	
	MATRIX OIL CORPORATION - RIDEOUT HEIGHTS	1	
Oil and Gas Extraction Total			90
Petroleum and Coal Products			
Manufacturing			
324000	CHEVRON PRODUCTS COMPANY	1	
	CONOCO PHILLIPS COMPANY SITE #0642	1	
	CONOCOPHILLIPS COMPANY	4	
	CONOCOPHILLIPS COMPANY, SITE 4413	1	
	CONOCOPHILLIPS/G&S ENTERPRISES	1	
	EQUILON ENT LLC DBA SHELL OIL PROD	1	
	EQUILON ENT LLC, SHELL OIL PRODUCTS DBA	1	
	EQUILON ENT LLC/SHELL OIL PRODUCTS US	1	
	EQUILON ENTERPRISES LLC/SHELL OIL PROD	2	
	EQUILON ENTERPRISES LLC/SHELL OIL PRODCT	1	
	EXXON MOBIL CORP 18-HNR	1	
	EXXON MOBILE CORP	1	
	EXXONMOBIL DLR, BILABOB INC #18-MYY	1	
	EXXONMOBIL OIL CORP	4	
	EXXONMOBIL OIL CORP/ETIC ENGR INC	1	
	EXXONMOBIL OIL CORPORATION	9	
	EXXONMOBIL OIL CORPORATION 18PLR	1	

Heavy Industry	324000	EXXONMOBIL OIL CORPORATION STN 18-MLT	1	
		EXXONMOBILE OIL CORPORATION	1	
		KANTEX INDUSTRIES	1	
		SHELL OIL PRODUCTS US	1	
		SHELL OIL PRODUCTS US - HSE/ S & E	1	
		SHELL OIL PRODUCTS US - HSE/S&E	11	
		SHELL OIL PRODUCTS US HSE/S&E	2	
		SHELL OIL PRODUCTS US -HSE/S&E	1	
		SHELL OIL PRODUCTS US/HSE/S&E	1	
		TESORO REF & MKTG. CO., WILMINGTON	1	
		TESORO REFINING AND MARKETING CO	1	
		WORLD OIL MARKETING CO, #108	1	
		WORLD OIL MARKETING COMPANY 10	1	
		324110	BP WEST COAST PROD.LLC BP CARSON REF.	1
			BP WEST COAST PRODUCTS LL	1
			CHEVRON PRODUCTS CO.	1
			CONOCOPHILLIPS COMPANY	3
			EQUILON ENTER, LLC-SHELL OIL PROD. US	1
			GOLDEN WEST REF CO	1
			SIERRA PROCESS SYSTEMS, INC	1
			ULTRAMAR INC GNRL	1
			ULTRAMAR INC (NSR USE ONL	1
			ULTRAMAR REFINING UNIT NO.25	1
		ULTRAMAR REFINING UNIT NO.26	1	
		VALERO WILMINGTON ASPHALT	1	
		WORLD OIL MARKETING CO, STATION #65	1	
		WORLD OIL MARKETING CO., SS #60	1	
		324121	ALL AMERICAN ASPHALT	2
			ASSOCIATED ASPHALT	1
			CAL MAT CO	1
			COAST ROOF CO INC	1
			GRANITE CONSTRUCTION COMPANY	1
			HANSON AGGREGATES WEST, INC.	1
			HOLLIDAY TRUCKING CO, INC	1
			KOCH MATERIALS COMPANY	1
			PARAMOUNT PETR CORP (EIS USE)	1
			SKANSKA	1
		324122	SULLY MILLER CONTRACTING CO.	2
			ARCHADEL INC	1
			ASPHALT PRODUCTS OIL CORP	1
			BUILDING MATERIALS MANUFACTURING CORP	1
			C J ROOFING COMPANY	1
			CENTURY ROOFING	1
			HENRY CO	1
			IN-O-VATE INC	1
			JAMES HARDIE BUILDING PRODUCT, LLC	1
			JOHNS MANVILLE CORPORATION	1
L.C. WILLARD ROOFING, LEON WILLARD DBA	1			
LEE ROOFING OF COSTA MESA	1			
LUNDAY-THAGARD COMPANY	1			
OWENS CORNING ROOFING AND ASPHALT, LLC	1			
R PAGE ROOFING INC	1			
RW MATERIALS LLC	1			
324191	SUN RISE ROOFING	1		
	D/K ENVIRONMENTAL	1		
	DEMENNO/KERDOON	1		
	LA CITY DWP, SIS ELSIE PUMPING PLANT	1		
	LUBECO INC	1		
	LUBRICATING SPECIALTIES CO	2		
WYNN OIL CO	1			
324199	CHEVRON USA INC	1		
Petroleum and Coal Products Manufacturing Total		109		
Plastics and Rubber Products Manufacturing				
326000	BUMPERS UNLIMITED, INC.	1		
	CALIFORNIA MOULDING CO	1		
	RC FIBERGLASS	1		

Heavy Industry	326000	RUBEN'S DISPLAY WORLD	1		
		U S BLANKS LLC	1		
		FIBERTECH POLYMERS, INC	1		
		HARRINGTON & SONS INC, STORYLAND STUDIOS	1		
		ISLANDER SPAS INC	1		
		326113	AMERICAN FUJI SEAL, INC.	1	
			AMERICAN RENLOIT CORPORATION LA	1	
			LIFOAM INDUSTRIES, LLC	1	
			MERCURY PLASTICS INC	1	
			PATRICK INDUSTRIES INC	1	
			TRM MANUFACTURING	1	
			UOP	1	
			PACIFIC PLASTICS, INC.	1	
			LITE EXTRUSIONS MFG INC	1	
			SPARTECH PLASTICS	1	
		326140	CAMBRO MANUFACTURING COMPANY	1	
			FOAM MOLDERS & SPECIALTIES	1	
			QYCELL CORP	1	
			AMERICAN POLYSTYRENE CORPORATION	1	
			FOAMEX INTERNATIONAL INC	1	
			326160	J-M MFG CO INC	1
				SETCO LLC	1
				JACUZZI WHIRLPOOL BATH	1
				R W LYALL & CO INC	1
				3D-CAM INC	1
		AIR LOGISTICS CORPORATION		1	
		ARMORCAST PRODUCTS COMPANY		1	
		CALIFORNIA ART PRODUCTS, CAPCOL PSA		1	
		CAMBRO MANUFACTURING CO		1	
		COSMIC PLASTICS INC		1	
		326199	EAGLE TECH	1	
			FOAM FABRICATORS	1	
			GLOBE PLASTICS, INC.	1	
			HY-LITE PRODUCTS, INC	1	
			M.C. GILL CORP	1	
			MEDWAY PLASTICS CORP	1	
			MODERN CONCEPTS INC.	1	
			MODIFIED PLASTICS	1	
			MOLDING CORPORATION OF AMERICA	1	
			OPTICOLOR INC.	1	
		PACTIV CORP	1		
		REFLECTIVE SURFACES CO.	1		
		REINHOLD INDUSTRIES INC	1		
		ROTONICS MANUFACTURING, INC.	1		
		TRU-FORM PLASTICS INC	1		
		VISION AQUATICS INC	1		
		326211	B A S RECYCLING, INC.	1	
CUSTOM INDUSTRIAL RACK INC	1				
RAINBOW SANDALS CORP	1				
PLASTIFLEX COMPANY INC	1				
326220	RUBBERCRAFT CORP OF CAL		1		
326291	RUBBERCRAFT CORP OF CAL		1		
326299	BARRY CONTROLS		1		
DA/PRO RUBBER INC	1				
GOODYEAR RUBBER CO OF SO CALIFORNIA	1				
H. C. LIEN RUBBER CO	1				
KIRK HILL RUBBER CO	1				
UNION CARBIDE, UCAR EMULSION SYSTEMS	1				
WEST AMERICAN RUBBER COMPANY, LLC	1				
Plastics and Rubber Products Manufacturing Total		61			
Primary Metal Manufacturing					
331111	CALIFORNIA STEEL INDUSTRIES INC	1			
	FIRTH RIXSON	1			
	PRECISION SPECIALTY METALS INC	1			
331210	WHEEL USA	1			
	CALIFORNIA STEEL AND TUBE	1			
	IMPERIAL PIPE SERVICES LLC	1			

Heavy Industry	331210	WESTERN TUBE & CONDUIT CORP	1
	331221	MACDONALD CARBIDE CO	1
		PACIFIC SINTERED METALS	1
	331222	ARTSONS MFG CO	1
	331312	ATLAS PACIFIC CORPORATION	1
		P.R.L. ALUMINUM	1
		TRI-ALLOY INC	1
	331314	UNIVERSAL MOLDING COMPANY	1
	331315	PECHINEY CAST PLATE INC	1
		TECHNICAL ANODIZE	1
	331316	FRONTIER ALUMINUM CORPORATION	1
		INDALEX WEST INC	1
		KAISER ALUMINUM FABRICATED PRODUCTS, LLC	1
		SIERRA ALUMINUM COMPANY	1
		UNIVERSAL ALLOY CORP	1
		UNIVERSAL MOLDING EXTRUSION, CO, INC	1
		VISTA METALS CORPORATION	1
	331491	LIBERTY MFG INC	1
	331492	HERAEUS METAL PROCESSING, LLC	1
		QUEMETCO INC	1
	331511	COVERT IRON WORKS	1
		FOX HILLS IND INC	1
		GREGG INDUSTRIES INC	1
		PACIFIC ALLOY CASTINGS INC	1
	331512	COASTCAST CORP	1
		FS PRECISION TECH LLC	1
		GASSER OLDS CO INC	1
	331513	DAMERON ALLOY FOUNDRIES INC	1
		PCA INDUSTRIES, LLC	1
		WEST COAST FOUNDRY	1
	331521	CALIFORNIA DIE CASTING INC	1
		INTERNATIONAL DIE CASTING INC	1
		KIM LIGHTING	1
	331524	L TO Z ENT, INC	1
		ALACER CORP.	1
		ALCAST FOUNDRY INC	1
		ALUMINUM PRECISION PRODUCTS INC	1
		BUDDY BAR CASTING	1
		CAST-RITE CORP	1
		COMMERCIAL DIE CASTING CO, INC	1
		COMMONWEALTH ALUMINUM CONCAST	1
		CONSOLIDATED FOUNDRIES INC	1
		PACIFIC CAST PRODUCTS, INC.	1
		THOROCK METALS COMPANY INC	1
	331525	MATTHEWS INTL. CORP., BRONZE DIV.	1
	331528	ALLOY DIE CASTING CO	1
		MILLER CASTINGS, INC	1
		Primary Metal Manufacturing Total	53
		Support Activities for Mining	
	213111	TEG OIL AND GAS USA INC	1
	213112	B J SERVICES CO/USA	1
		CENTRILIFT INC	1
		DCOR LLC	1
		MEDALLION CALIFORNIA PROPERTIES CO	1
		OIL OPERATORS - BELL LEASE	1
		OIL OPERATORS - BLUM LEASE	1
		OIL OPERATORS - ITALO COMMUNITY	1
		OIL OPERATORS - OLIVE COMMUNITY	1
		OIL OPERATORS - W C 6 LEASE	1
		OIL OPERATORS INC.	2
		OIL OPERATORS, INC	4
		OIL OPERATORS, INC - FULTON MCKEE	1
		PETROLEUM PROPERTIES LLC	1
		SCHLUMBERGER WELL SERVICES	1
		Support Activities for Mining Total	19

Heavy Industry	Transportation Equipment		
	Manufacturing		
	336100	PINNACLE LIMOUSINES MFG.	1
	336111	CLASSIC LIMOUSINE, INC	1
		LIPPERT COMPONENTS, INC	1
		SALEEN INC	1
	336120	ELDORADO NATIONAL	1
	336200	AL-KO KOBER CORP	1
		KRYSTAL KOACH, INC	1
	336211	GAYLORD'S INC	1
		HARBOR TRUCK BODIES INC	1
		LIMOS BY TIFFANY	1
		ROYAL TRUCK BODY INC	1
		SUPREME TRUCK BODIES OF CALIFORNIA	1
		TROJAN FABRICATORS INC	1
		VORSTEINER INC.	1
	336212	EXTREME ENGINEERING	1
		OWEN TRAILERS, INC	1
	336213	FLEETWOOD MOTOR HOMES OF CAL INC	1
	336214	ALFA LEISURE, INC.	1
		APACHE TRAILERS, MFG.	1
		CARSON TRAILER INC	1
		CUSTOM FIBERGLASS MFG CO/CUSTOM HARDTOP	1
		UNIVERSAL TRAILERS	1
		VISTA CONSOLIDATED, INC	1
	336300	ALKO KOBER CORPORATION	1
		CAMISASCA AUTOMOTIVE MFG, INC.	1
		CAPITAL WHEELS	1
		DOWNFORCE	1
	336311	CHAMPION SIDECARS INC	1
	336322	MOTORCAR PARTS & ACCESSORIES, INC	1
		ORANGE COUNTY ALTERNATOR, INC	1
		UNITED STATES ENERGY CORPORATION	1
	336339	D B ENGINEERING INC	1
	336360	AAA FLAG & BANNER MFG CO INC	1
		PRO DYE & FINISHING	1
	336370	CANAM METAL PRODUCTS, INC	1
		MARINE FENDER INT'L, INC.	1
	336399	ACME AUTO HEAD LINING CO	1
		AMERICAN RACING EQUIPMENT INC	1
		CALHAC INC	1
		CWD, LLC	1
		FRANKLIN ACQUISITION, LLC	1
		K & N ENGINEERING CO INC	1
		NRG MOTOR SPORTS	1
		SUPERIOR INDUSTRIES INTERNATIONAL INC	1
		TABC, INC	1
		U S RADIATOR CORPORATION	1
		WAAG	1
	336400	CIRCOR AEROSPACE INC	1
		NORTHROP GRUMMAN SPACE & MISSION SYSTEMS	1
		TRIUMPH INSTRUMENTS - BURBANK	1
	336411	GULFSTREAM AEROSPACE CORP	1
		GULFSTREAM AEROSPACE CORPORATION	1
		NORTHROP GRUMMAN CORP, AIRCRAFT DIV	1
		NORTHROP GRUMMAN CORP, NORTHROP AIRCRAF	1
		ROBINSON HELICOPTER CO INC	1
		THE BOEING COMPANY - C17 PROGRAM	1
	336412	ASTECH ENGINEERED PRODUCTS INC.	1
		ROHR,INC	1
		SUPERIOR PLATING INC	1
	336413	B/E AEROSPACE, INC	1
		BRICE MANUFACTURING CO	1
		COAST METAL CRAFT CORP	1
		COMANT INDUSTRIES	1
		DRETLOH AIRCRAFT SUPPLY, INC.	1
		DUCOMMUN AEROSTRUCTURES INC.	1
		DUCOMMUN AEROSTRUCTURES INC	1

Heavy Industry	336413	EATON AEROSPACE	1	
		ENSR CORPORATION	1	
		GOODRICH CORPORATION	1	
		HR TEXTRON INC	1	
		HYDROFORM USA	1	
		KAREM AIRCRAFT, INC	1	
		KLUNE INDUSTRIES INC	1	
		MST, SUB JAY-DEE AIRCRAFT SUPPLY CO INC	1	
		NEILL AIRCRAFT CO	1	
		QUALITY ALUMINUM FORGE DIV OF GEL IND	1	
		SARGENT FLETCHER INC	1	
		SMITHS AEROSPACE	2	
		SMITHS AEROSPACE ACTUATION SYSTEMS	1	
		SUNVAIR INC	1	
		TRANSDIGM INC, ADEL WIGGINS GROUP	1	
	336414	HYDRAULICS INTL INC	1	
		HYDRO SYSTEMS INC	1	
		HYDROCHEM INDUSTRIAL SERVICES, INC.	1	
	336419	HITCO CARBON COMPOSITES INC	1	
		NORTHROP GRUMMAN SPACE & MISSION SYSTEMS	2	
	336600	BARRON BOATS, INC DBA HALLETT BOATS	1	
		CATALINA YACHTS INC	1	
	336611	CALIBER 1 MARINE LLC	1	
		DENCHO MARINE INC	1	
		ELIMINATOR BOATS	1	
		WESCO METAL FABRICATORS INC	1	
	336612	CHIMER INDUSTRIES LLC/INTL MARINE	1	
		COLUMBIA YACHT CORPORATION	1	
		WESTERLY MARINE INC	1	
	336900	INTENSE CREATIONS	1	
	Transportation Equipment Manufacturing Total			98

Heavy Industry Total 1118

Institutional	Administration of Economic Programs		
	926000	ANAHEIM CITY MAINT OPERATIONS	1
		CAL TRANS	1
		CITY OF LAGUNA BCH MAINTENANCE FACILITY	1
	926120	CALIF DEPT OF TRANSPORTATION, CALTRANS	1
		CALTRANS	1
		CALTRANS DISTRICT 7 HEADQUARTERS	1
		CALTRANS DIV OF EQUIPMENT, FLEET MGMT	1
		EXXONMOBIL DLR, M. KHALED,#10773,#18-HQF	1
		LA CITY, DEPT OF GEN SERVICES	1
		LA CITY, HARBOR DEPT	1
		LA CO., METROPOLITAN TRANS AUTHORITY	1
		LOS ANGELES CITY OF	1
		PORT OF LOS ANGELES	1
		US COAST GUARD ISC SAN PEDRO	1
	926130	CITY OF RIVERSIDE PUBLIC	1
	926150	CHURCHILL DOWNS CALIF CO, HOLLYWOOD PARK	1
Administration of Economic Programs Total			16

Administration of Environmental Quality Programs

924110	CITY OF LA, BOS, WASTEWATER COLL SYS DIV	1
	CITY OF LA, BOS,WASTEWATER COLL SYS DIV	1
	CITY OF LA,BOS, WASTEWATER COLL SYS DIV	1
	CITY OF LA,BOS,WASTEWATER COLL SYS DIV	1
	CITY OF LOS ANGELES- BUREAU OF SANITATIO	1
	CITY OF RIVERSIDE, MAGNOLIA POLICE STN.	1
	COUNTY OF RIVERSIDE	1
	DEPARTMENT OF TOXIC SUBSTANCES CONTROL	1
	GARDEN GROVE CITY, PUB. WKS DEPT, WATER	1
	GATEWAY CREMATORY, STEPHEN M STRUNK	1
	GREVE FINANCIAL SERVICES INC	1

Institutional	924110	GSA ENGINEERING	1
		IRVINE RANCH WATER DIST	1
		IRVINE RANCH WATER DISTRICT	1
		L 3 COMMUNICATIONS, POWER MAGNETICS	1
		LA CITY, PUB WORKS DEPT	1
		LA CNTY SANITATION DISTRICT-PUENTE HILLS	1
		LA CO. PUBLIC WORKS DEPT	1
		LA CO. SANITATION DIST	1
		LA CO., SANITATION DIST	2
		LA COUNTY SANITATION DIST (CALABASAS)	1
		LA MILL INC	1
		LONG BEACH CITY, WATER DEPT	1
		METRO DISTRIBUTORS, INC.	1
		OC WASTE & RECYCLING	1
		ONYX POWER INC	1
		PEACEFUL PAWS PET CREMATORY	1
		QUANTUM FUEL SYSTEMS TECH. WORLD WIDE	1
		RIV CO WASTE MGMT (EDOM HILL)	1
		RIV CO., WASTE MGMT, BADLANDS LANDFILL	1
		RIVERSIDE COUNTY WASTE MANAGEMENT	1
		RUBIDOUX COMMUNITY SERVICES DISTRICT	1
		SNAK KING CORPORATION	1
		SOUTH COAST AIR QUALITY MANAGEMENT DIST	1
		SUNSHINE PLASTICS CORP	1
	T & D DRUM INC	1	
924120	BURBANK CITY PWD,BURBANK WTR RECLAM PLNT	1	
	CAL ST DEPT OF FORESTRY, FIRE DEPT	1	
	LA CO., DEPT. OF PARKS & RECREATION	1	
	LA CO., PARKS & REC DEPT	1	
Administration of Environmental Quality Programs Total			41

Administration of Housing Programs, Urban Planning, and Community Development

925000	LA CO, DEPT OF PUBLIC WORKS, ROAD DEPT.	1	
	ORANGE COUNTY FLOOD CONTROL DISTRICT	1	
	RUBIDOUX COMMUNITY SERVICES DIST	2	
925120	LA CO, DPW FLEET MGMT GRO	1	
	MONTEREY PARK CITY, CITY YARDS	1	
Administration of Housing Programs, Urban Planning, and Community Development Total			6

Administration of Human Resource Programs			
923110	LA CO., MUSEUM OF NATURAL HISTORY	1	
923130	COUNTY OF ORANGE, SOCIAL SERVICES AGENCY	1	
	COUNTY OF RIVERSIDE	2	
923140	U S GOV'T, V A MEDICAL CENTER, WEST L A	1	
Administration of Human Resource Programs Total			5

Ambulatory Health Care Services		
621000	BELLFLOWER MEDICAL CENTER	1
	KINDRED HOSPITAL - SANTA ANA CAMPUS	1
	RANCHO SPECIALTY HOSPITAL	1
	TOTALLY FOR KIDS SPECIALTY HEALTH CARE	1
	WHITTIER OUTPATIENT SURGERY CENTER	1
621111	KAISER FOUNDATION HOSPITAL	2
	KAISER PERMANENTE ONTARIO VINEYARD MED C	1
	LA CO., HUDSON COMPREHENSIVE HEALTH CTR	1
	METRO MEDICAL MALL-1930 WILSHIRE BLVD	1
	ORTHOPAEDIC HOSP	1
	SAINT JOHN'S HOSPITAL & HEALTH CENTER	1
	TARZANA MEDICAL PLAZA	1
621112	C & C IMPORTS INC, NANCY CORZINE	1
	COUNTY OF RIVERSIDE REGIONAL MEDICAL CTR	1
	LAKEWOOD REGIONAL MEDICAL CENTER, INC	1
621210	GOLDEN SPRINGS SHELL	1

Institutional	621310	LA CITY, DEPT OF GEN SERVICES	1	
	621330	HEMET EAST CENTER STATION	1	
	621492	MORENO VALLEY SERVICE STATION	1	
	621498	LOS ROBLES OUTPATIENT MEDICAL CENTER	1	
	621511	MISSION HOSPITAL	1	
		QUEST DIAGNOSTICS INC	1	
		QUEST DIAGNOSTICS INC.	1	
		SPECIALTY LABORATORIES, INC	1	
	621512	HENRY MAYO NEWHALL MEMORIAL HOSPITAL	1	
	621610	GRANDVIEW PALMS, LLC	1	
	621999	GRANITE-MYERS-RADOS A JOINT VENTURE	1	
		LA CITY, DEPT OF GEN SERVICES	1	
		LITTLE COMPANY OF MARY HEALTH SERVICES	1	
		PROCEDURE CENTER OF IRVINE	1	
	Ambulatory Health Care Services Total			31
	Educational Services			
	611000	HEMET UNIFIED SCHOOL DISTRICT	1	
	LOS ANGELES UNIFIED SCHOOL DISTRICT	1		
	POMONA COLLEGE	1		
	SEGERSTROM HIGH SCHOOL	1		
	THE WILLOWS COMMUNITY SCHOOL	1		
611110	ALTA LOMA SCHOOL DISTRICT	1		
	BELLFLOWER UNI SCH DIST, MAINT DEPT	1		
	BUENA PARK HIGH SCHOOL	1		
	CHINO VALLEY UNIFIED SCH DIST	1		
	COLTON UNIFIED SCH DIST TRANS DEPT	1		
	CORONA-NORCO U. S. D.-CENTENNIAL H. S.	1		
	HUNTINGTON BEACH UNION HIGH SCHOOL DIST	1		
	LA HABRA HIGH SCHOOL	1		
	LA UNI SCH DIST, LINCOLN SENIOR HIGH	1		
	LA UNI SCH DIST, NIGHTINGALE MIDDLE SCH	1		
	LA UNI SCH DIST, NOBEL MIDDLE SCHOOL	1		
	LA UNI SCH DIST, WOODROW WILSON HIGH	1		
	LAS VIRGENES MUNICIPAL WATER DISTRICT	1		
	MONTEBELLO UNI SCH DIST	1		
	MORENO VALLEY UNIFIED SCHOOL DISTRICT	1		
	MURRIETA VALLEY UNIFIED SCHOOL DISTRICT	1		
	NEWPORT-MESA UNI SCH DIST	1		
	ORANGE CO, PROBATION DEPT	1		
	PASADENA UNI SCH DIST, PASADENA HIGH SCH	1		
	PASADENA USD, CHARLES W ELIOT MIDDLE SCH	1		
	PLACENTIA-YORBA LINDA UNIFIED SCHOOL DIS	1		
	RIM UNIFIED SCH DIST/RIM OF THE WORLD HS	1		
	SUNNY HILLS HIGH SCHOOL	1		
	THE HELP GROUP	1		
611210	CERRITOS COMMUNITY COLLEGE	1		
	CRAFTON HILLS COLLEGE	1		
	EL CAMINO COLLEGE	1		
	GOLDEN WEST COLLEGE, COMMUNITY COLLEGE	1		
	LA CITY COLLEGE	1		
	MT. SAN ANTONIO COMMUNITY COLLEGE	1		
	NORTH OR. CO. COMM COL DIST	1		
	NORTH ORANGE COUNTY COMM.COLLEGE DIST.	1		
	RIO HONDO COMMUNITY COLLEGE	1		
	SADDLEBACK COMMUNITY COLLEGE DISTRICT	1		
	SANTA CLARITA COMMUNITY COLLEGE DISTRICT	1		
	UNIVERSITY OF CALIFORNIA, LOS ANGELES	1		
611310	BIOLA UNIVERSITY	1		
	CAL BAPTIST UNIVERSITY	1		
	CAL INST OF TECH	1		
	CAL ST UNIV LA	1		
	COLLEGE OF THE DESERT	1		
	OCCIDENTAL COLLEGE	1		
	PEPPERDINE UNIVERSITY	1		
	POMONA COLLEGE	1		
	UNIV CAL IRVINE (NSR USE ONLY)	1		
	UNIV CAL, RIVERSIDE	1		

Institutional	611310	UNIV OF SO CAL	1	
		UNIVERSITY OF REDLANDS	1	
		UNIVERSITY SO CALIFORNIA,HEALTH SCIENCES	1	
		UNIVERSITY VILLAGE HOUSING LLC	1	
	611519	LA UNIFIED DIST, FRIEDMAN OCCUPATION CTR	1	
		LOS ANGELES CENTER STUDIOS MGMT CO	1	
	611610	CALIFORNIA INSTITUTE OF THE ARTS	1	
		LAKESIDE HIGH SCHOOL	1	
	611699	EQUILON/SHELL,CONICO CORO/P.HONG #136276	1	
		MEDICAL CENTRE OF SANTA MONICA	1	
		ORANGE CO - JUVENILE JUSTICE CENTER	1	
	Educational Services Total			62
	Executive, Legislative, and Other General Government Support			
	921000	CITY BEAN INC	1	
		CITY OF ANAHEIM-WELL #48	1	
		CITY OF BURBANK	1	
		CITY OF CHINO HILLS	1	
	CITY OF CULVER CITY	1		
	CITY OF GARDENA	1		
	CITY OF L A,BOS, WASTEWATER COLL SYS DIV	1		
	CITY OF LA, BOS,WASTEWATER COLL SYS DI	1		
	CITY OF LOS ANGELES DEPT OF GEN SVCS	1		
	CITY OF ONTARIO	1		
	CITY OF TORRANCE/TORRANCE DUMP	1		
	CITY OF YORBA LINDA	1		
	COUNTY OF LA , INTERNAL SERVICE DEPT.	1		
	COUNTY OF RIVERSIDE	2		
	COVINA, CITY OF - PUBLIC SAFETY COMPLEX	1		
	DEPARTMENT OF GENERAL SERVICES	1		
	L A CITY BUREAU/ SANITATION SOLID RESRCS	1		
	L A COUNTY DEPT OF PUBLIC SOCIAL SERVICE	1		
	L.A. CITY, DEPT. OF GENERAL SERVICES	1		
	LA CITY,DEPT OF GEN SVCS,LAPD MID CITY	1		
	LONG BEACH CITY, WATER DEPARTMENT	1		
921110	BANNING CITY, WASTEWATER TREATMENT PLANT	1		
	BELL GARDENS CITY	1		
	BREA CITY	1		
	CITY OF ALHAMBRA	1		
	CITY OF ALHAMBRA/ALHAMBRA POLICE DEPT.	1		
	CITY OF ARCADIA	1		
	CITY OF BALDWIN PARK, DEPT OF PUB WKS	1		
	CITY OF COMMERCE, TRANSPORTATION DEPT	1		
	CITY OF GARDENA	1		
	CITY OF GLENDALE/PUBLIC WORKS ADMIN	1		
	CITY OF IRVINDALE, RECREATION DEPT	1		
	CITY OF SOUTH GATE PUBLIC WORKS	1		
	CITY OF SOUTHGATE WATER DEPT	1		
	CITY OF VERNON-FIRE STATION NO. 1	1		
	CLAREMONT CITY	1		
	CORONA CITY, DEPT OF WATER & POWER	1		
	COSTCO WHOLESALE CORPORATION # 638	1		
	COVINA CITY FIELD OPER DEPT	1		
	EL MONTE CITY	1		
	EL MONTE CITY, PUB WKS DEPT, (HOYT YARD)	1		
	EL MONTE CITY, WATER DEPARTMENT	1		
	GARDEN GROVE CITY, WESTHAVEN PUMP STATN	1		
	HUNTINGTON BEACH, CITY, WARNER FIRE STAT	1		
	LA CITY, DEPT OF GEN SERVICES	1		
	LA CITY, DEPT OF GEN SERVICES, PIPER TEC	1		
	LA CITY, DEPT OF GENERAL SERVICES	1		
	LA CO., DEPT OF PUBLIC WORKS	1		
	LA PALMA CITY, PUBLIC WORKS DEPT	1		
	LAGUNA BEACH, CITY CIVIC CTR	1		
	LEVEL 3 COMMUNICATIONS, LLC.	1		
	LONG BEACH CITY, BUILDING SERVICES	1		

Institutional	921110	NEWPORT BEACH CITY	1	
		NEWPORT BEACH CITY, CITY HALL	1	
		PALM SPRINGS CITY (PAVILION)	1	
		PASADENA CITY, CITY HALL	1	
		POMONA, CITY OF, WATER DEPT	1	
		SAN BERNARDINO CITY MUN WATER DEPT (WRP)	1	
		SAN BERNARDINO CO, VEHICLE SRVCS DEPT	1	
		SANTA FE SPRINGS CITY	2	
		SOUTH GATE CITY	1	
		VERNON CITY, LIGHT & POWER DEPT	1	
		WHITTIER CITY	1	
	921120	BEAUMONT CITY	1	
		BEAUMONT CITY/MARSHALL CK LIFT STN	1	
		BEAUMONT CITY/NOBLE CK LIFT STN	1	
		HUNTINGTON PARK CITY, WATER YARD	1	
	921130	COUNTY OF ORANGE	1	
		US DEPT OF HOMELAND SECURITY CUST&BORDER	1	
	921190	COUNTY OF RIVERSIDE	2	
		LA CITY, DEPARTMENT OF AIRPORTS	1	
		LA CITY, DEPT OF GEN SERVICES	1	
		LA CO, DEPT OF PUBLIC WORKS/WATERWORKS	1	
		LA CO., DEPT OF PARKS-BONELLI PARK	1	
		LONG BEACH UNI SCH DIST	1	
		O C WASTE & RECYCLING	1	
		ORANGE CO OF, RDMD/FACILITIES OPERATIONS	1	
		PASADENA CITY	1	
		REDLANDS CITY, WASTEWATER TREATMENT PLT	1	
		SAN BERNARDINO VEHICLE SERVICES DEPT	1	
		THE GENERAL SERVICES ADMINISTRATION	1	
		CITY OF RIVERSIDE (TEQUESQUITE LANDFILL)	1	
	921220		1	
	Executive, Legislative, and Other General Government Support Total			85
	Hospitals			
	622000	KINDRED HEALTHCARE	1	
		LONG BEACH MEMORIAL MEDICAL CENTER	1	
		PROVIDENCE HEALTH SYSTEM	1	
	622110	ANAHEIM MEMORIAL HOSPITAL	1	
		BEAR VALLEY COMMUNITY HEALTHCARE DIST.	1	
		BELLFLOWER MEDICAL CENTER	1	
		BEVERLY HOSPITAL	1	
		CENTURY CITY DOCTORS HOSPITAL	1	
		CHILDREN'S HOSPITAL OF LOS ANGELES	1	
		CITY OF HOPE MEDICAL CENTER	1	
		EISENHOWER MEDICAL CENTER	1	
		GLENDALE ADVENTIST MEDICAL CTR	1	
	HEALTH RESOURCES OF AMERICA,COASTAL COMM	1		
	HEMET VALLEY HOSP DIST(MORENO VLY MD CTR	1		
	HOAG MEM HOSP PRESBYTERIAN	1		
	HUNTINGTON MEMORIAL HOSPITAL	1		
	HUNTINGTON MEMORIAL HOSPITAL UNIT NO.01	1		
	KAISER FOUNDATION HOSP	2		
	KAISER FOUNDATION HOSPITAL	5		
	KAISER PERMANENTE	2		
	LA PALMA INTERCOMMUNITY HOSPITAL	1		
	LAC/USC MEDICAL CENTER	1		
	LLUMC (EAST CAMPUS ADMINISTRATION	1		
	LONG BEACH MEMORIAL MEDICAL CENTER	1		
	METHODIST HOSPITAL OF SO CAL	1		
	MOTION PICTURE & TELEVISION FUND	1		
	NME HOSPITALS INC, USC UNIVERSITY HOSP	1		
	PACIFIC HOSPITAL OF LONG BEACH	1		
	PACIFIC OCEAN DYEING & FINISHING, INC	1		
	PRESBYTERIAN INTERCOMMUNITY HOSP	1		
	REDLANDS COMMUNITY HOSPITAL	1		
	ROBERT F KENNEDY MEDICAL CENTER	1		
	SAINT JOSEPH HOSPITAL	1		
	SAINT MARY'S MEDICAL CENTER	1		
	SAN ANTONIO COMMUNITY HOSPITAL	1		

Institutional	622110	SAN GABRIEL VALLEY MEDICAL CENTER	1	
		SANTA TERESITA MEDICAL CENTER	1	
		SOUTH COAST MEDICAL CENTER	1	
		ST JUDE MEDICAL CENTER	1	
		ST. FRANCIS MEDICAL CENTER	1	
		UNIV CAL IRVINE MEDICAL CTR	1	
		VALLEY PRESBYTERIAN HOSPITAL	1	
	622210	HENRY MAYO NEWHALL MEM HOSP	1	
		METROPOLITAN STATE HOSPITAL	1	
		MISSION COMMUNITY HOSPITAL	1	
		STAR VIEW ADOLESCENT CENTER	1	
	Hospitals Total			52
	Justice, Public Order, and Safety Activities			
	922000	CHINO VALLEY INDEPENDENT FIRE DIST	1	
		CITY OF LA, DEPT OF GEN SVCS, LAPD ADM B	1	
		COUNTY OF LOS ANGELES SHERIFF'S DEPT	1	
		LOS ANGELES COUNTY EMS AGENCY	1	
		LOS ANGELES COUNTY FIRE STATION 111	1	
	922110	LA CO, MUNICIPAL COURT	1	
		SAN BERN. CO. TWIN PEAKS BLDG	1	
	922120	ANAHEIM CITY, POLICE DEPT	1	
		CAL ST, HIGHWAY PATROL	1	
		CAL ST, HWY PATROL	1	
		CALIFORNIA HIGHWAY PATROL	1	
		CALTRANS	1	
		COSTA MESA CITY, FIRE STATION DEPT	1	
	COUNTY OF ORANGE/HARBORS,BEACHES, PARKS	1		
	CULVER CITY	1		
	FONTANA CITY, POLICE DEPT	1		
	FRONTIER ENVIRONMENTAL SERVICES, INC	1		
	LA CITY, DEPT OF GEN SERV, AHMANSON RECR	1		
	LA CITY, DEPT OF GEN SERVICES	1		
	LA CO SHERIFF'S DEPT, FAC SVRS BUREAU	1		
	LA CO., SHERIFF'S DEPT.	3		
	LONG BEACH CITY, BUILDING SERVICES	1		
	LOS ANGELES CO SHERIFF DEPT/LA REGIONAL	1		
	LOS ANGELES CO. SAN DIMAS SHERIFF'S DEPT	1		
	LOS ANGELES COUNTY SHERIFF'S DEPT	1		
	ONLY CREMATIONS FOR PETS, INC	1		
	ORANGE CO, NORTH COURTS	1		
	POMONA CITY	1		
	WESTERN MUNICIPAL WATER DISTRICT	1		
922130	LA CO.,INTERNAL SER DIV, S F VLY JUV HAL	1		
	ORANGE, COUNTY HARBOR JUSTICE CENTER	1		
	STATE OF CALIFORNIA DEPT OF JUSTICE	1		
922140	COUNTY OF RIVERSIDE GSA FLEET SERV	1		
	HEMAN G STARK YOUTH CORRECTIONAL FAC	1		
	LA CO, BARRY J. NIDORF PROBATION	1		
	SAN BERN. CO, EPWA COUNTY JAIL	1		
922150	ORANGE COUNTY PROBATION DEPT	1		
922160	ANAHEIM CITY, FIRE DEPT STAT 6	1		
	CITY OF HEMET	1		
	CITY OF LA, BOS,WASTEWATER COLL SYS DIV	1		
	COSTA MESA CITY, POLICE DEPT	1		
	LA CITY, DEPT OF GEN SERVICES	1		
	LA CO, FORESTER & FIRE WARDEN	1		
	LA CO., FIRE DEPT - FORES	1		
	PALM SPRINGS CITY (MUNICIPAL)	1		
	REDLANDS CITY (CALIFORNIA ST LANDFILL)	1		
	RIALTO CITY	1		
922190	CITY OF ONTARIO, POLICE DEPT,	1		
	NEWPORT BEACH CITY, UTILITIES DEPT	1		
	ONTARIO POLICE DEPARTMENT	1		
Justice, Public Order, and Safety Activities Total			52	

Institutional	Museums, Historical Sites, and Similar Institutions		
	712110	CALIFORNIA SCIENCE CENTER	1
		CITY OF LA, BOS, WASTEWATER COLL SYS DIV	1
		CITY OF LA, DEPT OF RECREATION & PARKS	1
		J. PAUL GETTY TRUST	1
		MUSEUM OF CONTEMPORARY ART	1
	712130	THE LIVING DESERT	1
	Museums, Historical Sites, and Similar Institutions Total		6
	National Security and International Affairs		
	928110	CALIFORNIA ARMY NATIONAL GUARD	1
		CALIFORNIA NATIONAL GUARD ARMORY	1
		US GOVT, AF DEPT, MARCH AIR RESERVE BASE	1
		US GOVT, GEN SERV ADM	1
	National Security and International Affairs Total		4
	Nursing and Residential Care Facilities		
	623110	BELMONT VILLAGE ENCINO INC	1
		CLAREMONT MANOR	1
		DCOR LLC	1
		JEWISH HOME FOR THE AGING	1
		LA JEWISH HOME FOR THE AGING	1
		SUNSET HAVEN	1
	623312	LAUREL CANYON CHEVRON	1
		ST JOHN OF GOD RETIREMENT & CARE CENTER	1
623990	COVENANT MANOR	1	
	LA CITY HOUSING AUTHOR/INDEPEND SQUARE	1	
	PILGRIM TOWER NORTH	1	
	RANCHO SAN ANTONIO	1	
Nursing and Residential Care Facilities Total		12	
Performing Arts, Spectator Sports, and Related Industries			
711190	C I M GROUP, LLC - HOLLYWOOD CENTER	1	
	FORUM ENTERPRISES	1	
711212	HOLLYWOOD PARK LAND COMPANY LLC	1	
	IRWINDALE SPEEDWAY	1	
	LOS ALAMITOS RACE COURSE, DR. E. ALLRED	1	
711310	AMPAS/ PICKFORD CENTER	1	
	CUSTOM ENTERTAINMENT CENTERS	1	
	PARAMOUNT PICTURES CORP	1	
	RADFORD STUDIO CENTER, INC.	1	
711410	GLENDALE CITY (MAINTENANCE YARD)	1	
	LOUISVILLE BEDDING CO	1	
	MID VALLEY AUTOMOTIVE, HAMID JARAHZADEH D	1	
Performing Arts, Spectator Sports, and Related Industries Total		12	
Religious, Grantmaking, Civic, Professional, and Similar Organizations			
813000	WEST OCEAN ASSOCIATION	1	
813110	CALVARY COMMUNITY CHURCH	1	
	CHURCH SCIENTOLOGY CELEB CTR INT MAN HTL	1	
	HOLLYWOOD INDEPENDENT AUT	1	
	NEW CINGULAR WIRELESS PCS, AT&T MOBILITY	1	
	PROVIDENCE HOLY CROSS MEDICAL CTR.	1	
	PROVIDENCE HOLY CROSS SURGERY CENTER	1	
	UNITED OIL	1	
	UNITED OIL #74	1	
813211	LA CITY, HARBOR COLLEGE	1	
813212	AARP - MODERN MATURITY MAG	1	
	ALTA LOS ANGELES HOSPITALS INC, LA COMM	1	
	BEACH CITIES HEALTH DISTRICT	1	

Institutional	813319	ORANGE CO, CENTRAL UTILITY FACILITY	1
	813410	CAL ST, POLYTECHNIC UNIV, POMONA	1
		ORANGE COAST COLLEGE, COMMUNITY COLLEGE	1
		THE WILDLANDS CONSERVANCY	1
	813910	HENKEL CORPORATION	1
		INDUSTRY CITY, CIVIC RECREATIONL IND AUTH	1
		RUBIDOUX COMMUNITY SERVICES DISTRICT	1
		WESCO CONSTRUCTION & SPECIALTY EQUIPMENT	1
	813920	CHILLED WATER PLANT, LLC	1
		RIVERSIDE CITY, PUBLIC UT	1
	813930	CARPENTERS PENSION TRUST/SC	1
		HEALTH CARE EMPLOYEES UNION LOCAL 399	1
		SFPP, L.P., UNIT NO.01	1
		SO CAL GAS CO	1
	813940	ORANGE CO - COUNTY OPERATIONS CENTER	1
	813990	ARROWHEAD LAKE ASSOCIATION	1
		OCEAN CLUB HOMEOWNERS ASSOC	1
		PREMIERE TOWERS/SPRING TOWERS LLC	1
	Religious, Grantmaking, Civic, Professional, and Similar Organizations Total		31
	Social Assistance		
	624120	SANTA MONICA CHRISTIAN TOWERS	1
	624190	COUNTY OF RIVERSIDE FLEET SRVCS DEPT	1
		LA CITY, DEPT OF GEN SERVICES	1
624410	KICK START CUSTOMS	1	
	PEDIATRIC & FAMILY MEDICAL CENTER	1	
Social Assistance Total		5	
Space Research and Technology			
927110	CALTECH / JET PROPULSION LABORATORY	1	
Space Research and Technology Total		1	
Institutional Total		421	
Light Industry/Warehouse			
Apparel Manufacturing			
315000	G & M MATTRESS & FOAM CORP	1	
315191	C R TEXTILE INC	1	
	FANTASY DYEING & FINISHING INC	1	
	SUNGDO INTERNATIONAL INC	1	
315200	GUESS ? INC, #531690	1	
315212	BROWNIES SUEDE & LEATHER CLEANERS INC	1	
315224	SEVENTY SEVEN LTD	1	
315228	NYALA SCREEN PRINTING INC	1	
	ROGER CLEVELAND GOLF, INC.	1	
315233	MACY'S - BEVERLY CENTER #66A	1	
315299	CENTER THEATRE GROUP	1	
315999	FORTUNE FASHIONS IND	1	
Apparel Manufacturing Total		12	
Beverage and Tobacco Product Manufacturing			
312111	7UP/RC BOTTLING CO OF SOUTHERN CAL	1	
	ASEPTIC SOLUTIONS USA, LLC	1	
	COCA-COLA BOTTLING CO OF LA	1	
	COTT BEVERAGES USA	1	
	REAL MEX FOODS, INC	1	
312120	ANHEUSER-BUSCH INC., (LA BREWERY)	1	
	FLAVOR SPECIALTIES, INC.	1	
	MILLER BREWERIES WEST LP	1	
312130	TEMECULA SPRINGS LTD PARTNERSHIP	1	
Beverage and Tobacco Product Manufacturing Total		9	
Food Manufacturing			
311000	EL AUTENTICO MEXICAN PRODUCTS	1	
	LOVIN OVEN, LLC	1	
	MCP FOODS INC	1	
	REX CREAMERY	1	

Light Industry/Warehouse	311000	ZAMORA MEXICAN FOODS	1
	311111	BREEDERS CHOICE PET FOODS INC	1
		HILL'S PET NUTRITION, INC.	1
		MARS PETCARE U.S., INC.	1
		PETPRO PRODUCTS, INC.	1
	311119	J D HEISKELL HOLDINGS LLC	1
		ORGANIC MILLING CORP.	1
		STAR MILLING CO	1
	311211	CEREAL FOOD PROCESSORS INC/CAL MILLING	1
		GENERAL MILLS INC	1
		HORIZON MILLING, LLC	1
	311212	MASTERFOODS USA	1
	311225	LIBERTY VEGETABLE OIL CO	1
	311340	SEE'S CANDY SHOPS INC	1
	311412	OVERHILL FARMS, INC	1
	311421	CLIFFSTAR CORPORATION/FONTANA	1
		DEL MONTE FOODS COMPANY	1
		KNOTT'S BERRY FARM FOODS, CONAGRA FOODS	1
		LANGER JUICE COMPANY, INC.	1
		TROPICANA MANUFACTURING COMPANY	1
		VITA PAKT CITRUS PROD CO	1
	311422	GOLDEN SPECIALTY FOODS. LLC	1
		JUANITA'S FOODS	1
	311511	COI ENERGY CENTER, LLC	1
		DRIFTWOOD DAIRY	1
		WHITE WAVE FOODS COMPANY	1
	311513	CON AGRA FOODS PKGD FOODS COMPANY, INC.	1
	311520	HUMBOLDT CREAMERY ASSOCIATION	1
	311610	SWIFT & COMPANY	1
	311611	BDS NATURAL PRODUCTS	1
		CARDENAS MARKETS INC	1
		CLOUGHERTY PACKING COMPANY (FARMER JOHN)	1
		CLOUGHERTY PACKING LLC/HORMEL FOODS CORP	1
		GOODMAN FOOD PROD INC	1
		HEALTHERVE FOOD MFG. USA, INC	1
		MARUKOME USA, INC.	1
		UNITED FOOD GROUP	2
	311612	RICE FIELD CORP. / DEREK LEE	1
		SQUARE H BRANDS INC	1
	311613	BAKER COMMODITIES INC	1
		DARLING INTERNATIONAL INC	1
		S & S FOODS, L.L.C.	1
	311711	AQUAMAR INC	1
		CCDA WATERS, LLC	1
	311811	CITY OF MONROVIA, DEPT OF PUBLIC WORKS	1
	311812	ALPHA BETA CO/RALPH GROCERY CO	1
		CAJOLEBEN, INC., GALASSO'S BAKERY, DBA	1
		CALIFORNIA CHURROS, INC	1
		DON MIGUEL MEXICAN FOODS, INC.	1
		FOOD FOR LIFE BAKING CO INC	1
		FRESH START BAKERIES	1
		INTERSTATE BRANDS CORP	4
		KEAN COFFEE	1
		LA BREA BAKERY INC	1
		PURITAN BAKERY INC	1
		SARA LEE FRESH, INC	1
		TELCO FOOD PRODUCTS	1
	311821	HOOP NUTS LLC.	1
		LAGUNA COOKIE COMPANY	1
		TORN & GLASSER, INC	1
	311823	MARUCHAN INC	1
		NISSIN FOODS (USA) CO., INC.	1
	311830	BIMBO BAKERIES USA INC	1
	311919	ACE CLEARWATER ENTER.	1
		BOTNBOT CORP	1
		FRITO-LAY NORTH AMERICA, INC.	1
	311920	FRESH FOODS CAFE CATALINA LANDING LLC	1
		GOURMET COFFEE	1

Light Industry/Warehouse	311920	QUOC VIET FOODS	1
		SUPREME BEAN/JOE TO GO	1
	311930	BLUE PACIFIC FLAVORS & FRAGRANCES INC	1
		COCA-COLA NORTH AMERICA	1
		FLAVOR INFUSION LLC	1
		FLAVORCHEM CORPORATION	1
		T. HASEGAWA U.S.A. INC	1
	311941	DAIRY FARMERS OF AMERICA	1
	311942	JSL FOOD GROUP	1
		LA VENCEDORA PRODUCTS, INC	1
		LING'S	1
		LOS PERICOS FOOD PRODUCTS	1
		MARQUEZ MARQUEZ FOOD PRODUCTS	1
		MARUKAN VINEGAR (USA) INC	1
		MISSION FOODS CORPORATION	1
		MIZKAN AMERICAS, INC	1
		MORTON SALT CO,	1
		NEXGEN PHARMA INC	1
		OVERHILL FARMS INC	1
		P & C POULTRY DISTRIBUTORS, INC.	1
		SUPERIOR NUT CO	1
		THMX HOLDINGS, LLCTHERMAL DYNAMICS CORP	1
		UPPER CRUST ENTERPRISES, INC	1
		USA FOODS, INC/LEE KUM KEE	1
	311991	READY PAC PRODUCE INC	1
	311999	JSL FOODS INC.	1
		NONG SHIM FOODS INC	1
		Food Manufacturing Total	103
		Furniture and Related Product	
		337000	
		A B FURNITURE, FEDERICO GUTIEREZ	1
		A CUSTOM SHUTTERS	1
		AAKE WOODWORKING	1
		AGAINST THE GRAIN WOODWORKS	1
		AGAN WOODCRAFTERS, INC	1
		ALDERSON WOODWORKING	1
		ALEXANDER & WILLIS	1
		ALL WOOD FINISHING	1
		ALPINE SHUTTER CRAFT	1
		ARCHITECTURAL INTERIOR CONCEPTS	1
		ART & FRAME CO, OF STONE MILL, INC.	1
		BARBA SHUTTERS	1
		BENETTI'S ITALIA, INC.	1
		BUCIO'S WOODWORKING, CRISPEN BUCIO DBA	1
		CABINETS OF UNIVERSE, INC.	1
		CAMPOS PINE FURNITURE INC	1
		CARPINTERIA AGUILAR	1
		CASTILLO'S CUSTOM CABINETS	1
		CHERRY BLOSSOM, J DIAZ & E DIAZ, INC	1
		CLASSIC GARCIA'S FURNITURE	1
		COASTAL CABINETS INC	1
		COMFORT SEATING SYSTEMS CORP	1
		CUSTOM CABINET CONNECTION, INC.	1
		CUSTOM WOODWORKS	1
		DE ROBBIO	1
		DECOR	1
		DELLAROBBA INC	1
		DESK MAKERS INC.	1
		DISTINCTIVE HOSPITALITY FURNITURE	1
		DO+ABLE PRODUCTS INC	1
		DOVETAIL FURNITURE	1
		DYDO DESIGNS, INC.	1
		E & J WOOD FINISH	1
		EURO-DECOR	1
		FALCON FINISHERS INC	1
		FAMA FURNITURE	1
		FINELINE CUSTOM DESIGN & MFG., INC	1

Light Industry/Warehouse	337000	FINELINE CUSTOM WOODWORKS INC	1
		FUTURE BLINDS AND SHUTTERS, T. NGUYEN	1
		GARFIELD'S FURNITURE, MARIA MORALES DBA	1
		GEOMETRY INTERIOR INC	1
		GEORGE CUSTOM CABINETS, JORGE ORTEGA DBA	1
		GLADY'S FURNITURE	1
		GRAMPS CUSTOM FURNITURE	1
		H & P KITCHEN & BATH CUSTOM BUILD	1
		H & V CUSTOM CABINETRY	1
		HERNANDEZ CABINETS	1
		HERNANDEZ FURNITURE DESIGN INC	1
		HILLSIDE CABINETS	1
		HILLSIDE CUSTOM CRAFT FURNITURE	1
		HOVIK'S CABINET	1
		J B WOOD FINISH	1
		J.R. CUSTOM CABINETS	1
		JACK'S CUSTOM	1
		LEON'S CABINETS	1
		M H WOODWORK CO INC	1
		MAURICIO ZELADA FINISHES	1
		MEA FURNITURE, INC.	1
		MELVIN KENNEDY DBA HUSHAI DDC (DBA)	1
		MICHEL CUSTOM PAINTING	1
		MONTE ALLEN, INC.	1
		MY CABINETS	1
		N5 INC, BASICALLY CABINETS DBA	1
		NANTUCKET SHUTTERS	1
		O DESIGN CORP	1
		OFF THE WALL INC.	1
		OM FURNITURE AND FINISHING	1
		PACIFIC WHOLESALE SHUTTERS & BLINDS	1
		PATIO CONCEPTS INC	1
		PHYLLIS MORRIS ORIGINALS	1
		PLANTATION SHUTTER FOR LESS	1
		PRIME TECH CABINETS, INC	1
		QUALITY ART INC	1
		QUATRINE FURNITURE, INC.	1
		RAMIREZ CUSTOM FINISHES	1
		REDWOOD PRODUCTS INC	1
		REPUBLIC FURNITURE MFG INC	1
		RESIDENCE FDG	1
		RICCARDELLI PAINTING	1
		RIVERLAND SHUTTERS	1
		SIERRA FURNITURE, INC.	1
		SOUTH BAY FURN. STRIPPING & REFINISHING	1
		ST. DENIS CORP/BRUSTLIN WORKSHOP	1
		STAGE ONE CUSTOM FURNITURE INC.	1
		TABER CO. INC.	1
		THE CUTTING EDGE	1
		TURKY CABINET SHOP	1
		UNITED COATING, INC.	1
		VILLAGE WOODCRAFTS INC.	1
		VISION SCAPE	1
		WILD IGUANA	1
		WILLIAM EARL DESIGNS INC	1
		WOOD BEDROOMS AND MORE INC.	1
		WOOD CRAFT	1
		WOOD DESIGN & ART	1
		WOODMILL SEATING PRODUCTS	1
		Z & R CABINET PAINTING	1
	337110	A B CABINETS #2	1
		ABBA KITCHEN CABINETS MFG.	1
		BROTHERS CUSTOM KITCHEN CABINETS	1
		CALIFORNIA CUSTOM CABINETS	1
		CARRISA CABINETS	1
		CREATIVE CUSTOM KITCHEN	1
		D & B CUSTOM CABINETS, INC	1
		D&B CUSTOM CABINETS	1

Light Industry/Warehouse	337110	DE LA ROCHA CABINETS	1
		DECOR WOOD & DESIGNS SHOP INC	1
		DEL VALLE CABINETS	1
		DISTINCTIVE DESIGNS & CONSTRUCTION	1
		ENVIRO-FINISH, INC.	1
		EURO COFFEE	1
		EURODESIGN CABINETS INC	1
		EXCEL CABINETS, INC.	1
		FLORES CABINETS	1
		G HORMANN ENTERPRISES INC	1
		GODIA INC.	1
		IMPERIAL 4 CABINETS, INC.	1
		IMPERIAL CUSTOM CABINET CO	1
		J.C.'S CUSTOM CABINETRY, JAVIER CARDENES	1
		JAMES MAGUIRE CABINETRY	1
		K & C KITCHEN CABINETS & DOORS	1
		KARMICHAEL'S CABINETRY	1
		LUIGI'S FINE WOODWORKS	1
		MARKS CABINETS & DESIGN, AHMAD ELHALWAHI	1
		MARQUEZ'S CUSTOM CABINETS	1
		MC CONNELL CABINETS INC	1
		MORENO & SONS CUSTOM CABINETS	1
		MV CUSTOM CABINETS	1
		NISSAN WOODWORKS INC, NISSAN WOODWORKING	1
		NORM TESSIER CABINETS	1
		PRECISION DISPLAY	1
		PREMIUM CUSTOM FINISH	1
		RINGO'S FINISHING	1
		ROYAL CABINETS	1
		SWISS CABINETS	1
		THE KITCHEN SPECIALISTS	1
		THOMAS CUSTOM CABINETS	1
		TRIPLE K CABINETS	1
		WESTWARD CABINETRY	1
	337121	C B S FURNITURE MFG CO INC	1
		CHATEAU FURNITURE	1
		CISCO BROTHERS, CORP	1
		DOVETAIL FURNITURE	1
		FLORES DESIGN	1
		THE UPHOLSTERY FACTORY INC	1
	337122	CABRAL ROOFING & WATERPROOFING CORP	1
		COLIN'S CUSTOM DESIGNS WOOD FINISHING	1
		DL MAYRA DESIGN INC	1
		EUROTEC	1
		FINISHED BY DESIGN	1
		FITUCCI KITCHEN CENTER INC	1
		IDENTITY CRAFT INC	1
		JOHN BOYD DESIGNS	1
		JP & A FURNITURE	1
		LOCKHART FURNITURE MANUFACTURING, INC	1
		MARIN & CO, INC	1
		OAKWOOD INTERIORS, INC	1
		REMO INC	1
		T & L FURNITURE MFG	1
		TORRES CABINETS	1
		TREE CROWNS FURNITURE, LLC	1
		VAUGHAN BENZ	1
	337124	ELLIOTT'S DESIGNS	1
		INNOVATIVE DESIGNS & MFG INC.	1
		MURRAY'S IRON WORKS	1
		RSI HOME PRODUCTS, GENERAL MARBLE DBA	1
		TERRA FURNITURE INC	1
	337125	ALLWOOD DESIGNS	1
		CAL WIRE PROD. CORP	1
		FREMARC DESIGNS	1
		HANNIBAL MATERIAL HANDLING SYSTEMS	1
		MOON INTERNATIONAL, INC.	1
		MOONLIGHT CUSTOM FINISHING	1

Light Industry/Warehouse	337125	PETER ANTHONY DESIGNS, INC.	1	
		TOP TOP FIBERGLASS MFG	1	
		UNIWEB INCORPORATED	1	
		WOODARD, LLC.	1	
		ZIV SIMONE & ASSOCIATES	1	
	337127	ELITE CABINETS INC	1	
		J L FURNISHINGS LLC	1	
		PACIFIC HOSPITALITY DESIGN INC	1	
		TALIMAR SYSTEMS	1	
	337211	CONTEMPORA WOOD FINISHING	1	
		FAUSTINO LIMON'S CHAIR FACTORY INC	1	
		PARKINSON ENTERPRISES INC	1	
	337212	ALL AMERICAN CABINETS INC	1	
		DO+ABLE PRODUCTS INC	1	
		GALERKIN DESIGN & MFG INC	1	
		IMPERIAL KITCHEN CABINETS,BLANCA RAMIREZ	1	
		NANTUCKET WOODWORKING	1	
		REDMART RETAIL INTERIORS	1	
		WEST COAST INDUSTRIES, INC	1	
		WEST COAST SIGNS CO	1	
	337214	THE HON CO	1	
	337215	C&D ZODIAC, INC	1	
		CHANNELL COMMERCIAL CORP.	1	
		CPS ENVIRONMENTAL GROUP	1	
		G & B FIBERGLASS PROD. CO INC	1	
		J D LINCOLN INC	1	
		MOLDED DEVICES	1	
		POLY PAK AMERICA INC	1	
		ROTO-INDUSTRIES, INC	1	
		SHMAZE CUSTOM COATINGS	1	
		SKYLON SPORTS	1	
		TA CHEN INTERNATIONAL	1	
	337910	LOS ANGELES FIBER CO, INC	1	
		LOS ANGELES FIBER COMPANY	1	
		RELIANCE UPHOLSTERY SUPPLY	1	
	337920	ATLANTIC/PACIFIC SHUTTER CO INC	1	
		DESERT CUSTOM SHUTTERS, EDWARD EDELMAN	1	
		ELIZABETH B TAYLER SHUTTERS, INC	1	
		TRAVIS AMERICAN	1	
	Furniture and Related Product Manufacturing Total			212
	Leather and Allied Product Manufacturing			
		316999	DANFIELD INC	1
			SAFARILAND LTD	1
	Leather and Allied Product Manufacturing Total			2
	Merchant Wholesalers, Durable Goods			
		423000	ALLAN COMPANY	1
			BORG PRODUCE SALES INC	1
			COOLEY EQUIPMENT INC	1
			DRP NETWORK	1
			EQUIPMENT COMPANY OF LOS ANGELES	1
		EQUIPMENT MANAGEMENT SERVICES ODUSA LLC	1	
		GRAND GLASS COMPANY	1	
		KINDER MANUFACTURING CORP	1	
		LR ENVIRONMENTAL EQUIPMENT CO INC	1	
		PICK YOUR PART	1	
		POMA AUTOMATED FUELING, INC.	1	
		SPECTRA DOOR CORPORATION	1	
		ADESA LA	1	
423110		AMERICAN HONDA MOTOR CO INC	2	
		BOXER TRUCK BODY	1	
		J.V. MANUFACTURING LLC.	1	
		MERCEDES-BENZ CLASSIC CAR CENTER	1	
		RIVERSIDE AUTO AUCTION	1	
		STANGWERKS, LLC	1	

Light Industry/Warehouse	423110	UNIVERSAL PROJECTS INC	1	
	423120	2020 TRADING, INC	1	
		CALIFORNIA PONY CARS	1	
		CAR-TECH COLLISION CENTER INC	1	
		GALPIN MOTORS INC	1	
		GUTIERREZ ALTERNATOR SHOP,F GUTIERREZ DB	1	
		HACIENDA AUTO SALES	1	
		HONDA PERFORMANCE DEVELOPMENT, INC	1	
		HUB CAPS ONLY INC	1	
		ICC COLLISION CENTERS	1	
		J.J.L TORQUE CONVERTERS	1	
		JR BODY SHOP, AARON MORALES DBA	1	
		MERCEDES-BENZ US, LLC	1	
		MOB WORKS, MIGUEL ORTIZ DBA	1	
		PRIME WHEEL	1	
		TOYOTA RACING DEVELOPMENT	1	
		VAN NUYS AUTO BODY	1	
		VANGUARD CAR RENTAL USA INC.	1	
		KUMHO TIRE USA INC	1	
	423130		WOLF BEDLINERS INC	1
	423140		DIRECT TERMINAL INC.	1
	423210		LONE STAR AUTOMOTIVE INC, PRO-BUILT DBA	1
			ADRIANO DESIGN INC	1
			CAL CREATIONS, INC	1
			DEARDEN'S	1
			E C GROUP, INC	1
			MANDALAY HOME FURNISHING, INC.	1
			PACIFIC FURNITURE DESIGN ENT.	1
			PHYLLIS MORRIS ORIGINALS INC	1
			TROLAN & TROLAN INC	1
			UPLAND QUALITY FURNITURE REFINISHING	1
	423310		ANGELUS BLOCK CO	1
			ASSOCIATED READY MIXED CONCRETE	1
			BALBOA BRICK & SUPPLY CORP	1
			CANAC KITCHENS	1
			CASTILLO'S CUSTOM CABINETS	1
			ESCON CORPORATION	1
			G O S CONSTRUCTION INC/SOLANGE KITCHEN	1
			INTERIOR DOOR CORP	1
			JAMES HARDIE BUILDING PRODUCTS INC	1
			LOWE'S	1
			LOWE'S HOME IMPROVEMENT WAREHOUSE	1
			OASIS WEST REALTY/BEVERLY HILTON HOTEL	1
			OWL ENERGY RES, BALLY'S TOTAL FITNESS	1
			OWL ENERGY RESOURCES, BALLY TOTAL FITNES	1
			SAROYAN LUMBER CO	1
			SUNSET WINDOW COVERING	1
			THE HOME DEPOT	1
			THE HOME DEPOT #605, 3E CO, REG.	1
			THE HOME DEPOT- LADERA HEIGHTS, CA	1
423320		CALIFORNIA PORTLAND CEMENT CO	1	
		CEMEX CONSTRUCTION MATERIALS PACIFIC,LLC	1	
		COACHELLA VALLEY AGGREGATES INC	1	
		DON DE CRISTO CONCRETE ACCESSORIES INC	1	
		F S T SAND & GRAVEL INC	1	
		F S T SAND & GRAVEL, INC	1	
		F.S.T. SAND AND GRAVEL, INC.	1	
		JOHN B EWLES INC	1	
		MATICH CORP	1	
		MOUNTAIN VIEW LAND COMPANY	1	
		SPECIALIZED BUILDING PRODUCTS	1	
		STANDARD LIME PRODUCTS CO INC	1	
		SUPERCHARGED, INC	1	
423330		DECRA ROOFING SYSTEMS, INC.	1	
		PREFERRED ROOFING CO, DAVID PAINE DBA	1	
		PREMIER METAL PRODUCTS CO	1	
		PREMIER ROOFING CA, INC.	1	
		SOUTH COAST SHINGLE CO INC	1	

Light Industry/Warehouse	423330	VALLEY ROOFING INC	1
		VANCE & ASSOCIATES ROOFING INC	1
	423440	MANNEQUIN GALLERY	1
	423450	GLENDALE ADVENTIST MEDICAL CENTER	1
		METRO MEDICAL MALL	1
	423510	DATA ELECTRONIC SERVICES	1
		MONICO ALLOYS, INC.	1
		PACIFIC COAST RECYCLING, LLC	1
	423520	OXBOW CARBON & MINERALS LLC	1
	423610	AAA ELECTRIC MOTOR SALES & SERVICE INC.	1
		CRITICOM / NACC	1
		MAIN ELECTRIC SUPPLY CO	1
		RDS WIRE & CABLE, INC.	1
		TRIGEN-LA ENERGY CORP	1
		IMPERIAL IRON WORK INC	1
	423620	ISU PETASYS INC	1
	423690	MONAST INC, DBA EUROPEAN HARDWARE	1
	423710	WORLDWIDE TECHNOLOGIES, INC.	1
	423730	MAYEKAWA USA INC	1
	423740	QUINN COMPANY	1
	423810	ONE STOP LANDSCAPE SUPPLY	1
	423820	FANUC AMERICA CORP	1
	423830	HERNANDEZ CABINETS	1
		JIMENEZ ORNAMENTAL & IRON WORKS	1
		NATIONWIDE MATERIAL HANDLING EQUIPMENT	1
		PEABODY ENGINEERING	1
		PRODUCTION TOOL SPECIALTIES	1
		SHUR FARMS FROST PROTECTION	1
		SRECO FLEXIBLE, INC	1
		UNITED FLYER & PRINTING, INC.	1
		WILDEN PUMP & ENGINEERING CO	1
	423840	K-DEER LA, INC	1
		MC MASTER-CARR SUPPLY CO	1
		PALMER JOHNSON DISTRIBUTORS LLC	1
	423850	PARADISE CLEANERS	1
		RAINBOW CLEANERS	1
	423860	AVIALL SERVICES INC	1
		METCRAFT ENTERPRISES INC	1
		MONOGRAM AEROSPACE FASTENERS	1
	423910	GENUINE WOOD FINISHING, MANUEL LOPEZ DBA	1
		TROY LEE DESIGNS	1
	423930	CONTAINER RECYCLING ALLIANCE	1
		INTERNATIONAL METAL TRADING INC	1
		SELF SERVE AUTO DISMANTLERS/ADAMS STEEL	1
	423990	DAVID WOOD FINISHING & PAINTINGS	1
		HOSHINO USA INC	1
		J & F WOOD PRODUCTS, INC.	1
		ROBERT KUO LTD.	1
		SPAUN DRUM COMPANY, INC.	1
		THERIEN AND COMPANY INC	1
		TOPCO SALES	1
		Merchant Wholesalers, Durable Goods Total	139
		Merchant Wholesalers, Nondurable Goods	
	424130	ERNEST PAPER PRODUCTS	1
		UNISOURCE WORLDWIDE INC	1
	424310	ROYAL PRINTEX INC	1
	424320	SILLA AMERICA, INC	1
	424410	SYSCO FOOD SERV OF LOS ANGELES INC	1
	424420	SPECIALTY BRANDS INC	1
	424430	MORNINGSTAR FOODS, LLC	1
		ROCKVIEW DAIRIES, INC	1
	424460	ORE-CAL CORPORATION	1
	424470	DAY-LEE FOODS INC	1
		RRR REAL ESTATE	1
	424480	CHIQUITA	1
	424490	GOGLANIAN BAKERIES, INC.	1

Light Industry/Warehouse	424490	JEAN MARTIN COFFEE ROASTER	1
		L.A. COUNTY SANITATION DIST VALENCIA PLT	1
		MADISON CLEANERS	1
		NESTLE'S WATER	1
		PACHACOM, INC.	1
	424590	DESERT COTTONSEED PRODUCTS INC	1
	424610	BAUSMAN & COMPANY	1
		ECOPLAST CORP	1
		HUGHES PROCESSING INC	1
		THENAPPAN INTERNATIONAL INC	1
	424690	AIR LIQUIDE INDUSTRIAL U.S., L.P.	1
		CARDINAL INDUSTRIAL FINISHES	1
		CHEMCENTRAL LA	1
		PRAXAIR INC	1
		UNIVAIR USA INC.	1
		VOPAK TERMINAL LONG BEACH INC,A DELAWARE	1
	424710	801 ROYAL OAKS GROUP C/O PES ENV INC	1
		AERA ENERGY LLC	1
		ALEX LEOWINGER	1
		AMBER RESOURCES LLC, SAWYER PETROLEUM	1
		ARCO FAC #01023 - YOUSSEF JOE ABDISHOO	1
		ARCO FAC #05884, BP WEST COAST PRODS LLC	1
		ARCO PRODUCTS COMPANY	1
		ARCO TERMINAL SERVICES CORP., TERMINAL 2	1
		ARCO TERMINAL SERVICES CORPORATION	1
		ATLANTIC RICHFIELD COMPANY	1
		BP WEST COAST PROD., ARCO COLTON	1
		BP WEST COAST PROD/ARCO VINVALE TERMINAL	1
		CARDLOCK FUELS	1
		CHEMOIL CORP, LONG BEACH MARINE TERMINAL	1
		CHEMOIL TERMINALS CORPORATION	1
		CHEVRON ENVIRONMENTAL MGMT COMPANY	1
		CONOCOPHILLIPS CO. L A TERMINAL	1
		CONOCOPHILLIPS/COLTON TERMINAL-WEST CO	1
		CONOCOPHILLIPS/TORRANCE TANK FARM CO	1
		COSTCO WHOLESALE #48	1
		EQUILON ENT LLC, SHELL OIL PROD. U S	1
		EQUILON ENTER LLC/SHELL OIL PRODUCTS US	1
		EQUILON ENTER., LLC, SHELL OIL PROD. U S	1
		EQUILON ENTERPRISES LLC,SHELL OIL PRODS	1
		EQUILON ENTERPRISES LLC/SHELL OIL PRODCT	1
		EQUILON ENTERPRISES, LLC./TULLER AVE	1
		EXXONMOBIL OIL CORP	1
		EXXONMOBIL OIL CORPORATION	12
		KINDER MORGAN LIQUIDS TERMINALS, LLC	1
		PACIFIC TERMINALS LLC	3
		PETRO DIAMOND TERMINAL CO	1
		RIBOST TERMINAL, LLC.	1
		SHELL OIL PRODUCTS	1
		SHELL OIL PRODUCTS US	11
		SHELL OIL PRODUCTS US - HSE/S&E	3
	424720	APRO LLC, APRO #31	1
		CONVENIENCE RETAILERS - 2705742	1
		COOL FUEL INC	1
		EXXONMOBIL OIL CORP, #18-HGC, 11049	1
		FUEL CONTROLS INC	1
		FULLERTON GAS INC, DBA FULLERTON VALERO	1
		KENNY STRICKLAND INC	1
		POMA AUTOMATED FUELING	1
		POMA AUTOMATED FUELING INC	2
		SANTA MONICA PETROLEUM	1
		SOUTHWEST AIRLINES CO	1
		THE SOCO GROUP INC	1
		THOMPSON OIL COMPANY	1
		UNIFIED PETROLEUM #1	1
	424810	ANHEUSER-BUSCH COMPANIES INC	1
		STRAUB FAMILY TRUST DIST CO	1
	424820	SOUTHERN WINE & SPIRITS	1

Light Industry/Warehouse	424900	AL-SAL OIL CO INC #42	1
		WE-CEL CREATIONS	1
	424910	KELLOGG SUPPLY INC	1
	424950	ELLIS PAINT CO/PACIFIC COAST LACQUER	1
Merchant Wholesalers, Nondurable Goods Total			111
Miscellaneous Manufacturing			
	339000	ADVANCED CARDIOVASCULAR SYSTEMS	1
		ARCHITECTURAL DESIGN & SIGNS	1
		E.G.F. CUSTOM QUALITY SIGNS	1
		ICON IDENTITY SOLUTIONS	1
		KENDALL SIGN INC	1
		M & J DESIGN GROUP	1
		MARC'S CREATURE CO	1
		POWERSIGN CLASSIC NEON	1
		SIGNATURE DESIGN	1
		SPARKS EXHIBITS & ENVIRONMENTS, LTD	1
	339111	PARTER MEDICAL PRODUCTS I	1
	339112	ADVANCED CARDIOVASCULAR SYSTEM	2
		B BRAUN MEDICAL, INC	1
		BECKMAN COULTER, INC.	1
		EUTECHNICS DIVISION ALPHA SENSORS	1
		I-FLOW CORP	1
		MEDSEP CORPORATION	1
	339113	AMERICH CORP	1
		EDWARDS LIFESCIENCES LLC	1
		INNOVATION SPORTS LLC	1
		MEDTRONIC INC., HEART VALVES DIV.	1
	339114	3M ESPE DENTAL PRODUCTS DIVISION	1
		3M UNITEK CORPORATION	1
		DENTIUM, INC.	1
	339911	LUMINAR CREATIONS INC	1
		PARK CENTRAL BLDG.	1
	339912	AMERICAN POWDER COATING & PAINTING INC	1
	339914	ENCORE AWARDS & MARKETING CORP	1
	339920	ASTERISK LLC.	1
		NATIONAL SIGNAL, INC	1
		OROZCO INTERNATIONAL INC	1
		PARAMOUNT FITNESS CORP	1
		STEELCRAFT WEST	1
	339932	MATTEL SALES CORP.	1
		REAGENT CHEMICAL & RESEARCH INC	1
		SCHLOSSER FORGE COMPANY	1
	339950	CENSOURCE, INC	1
		GBD GRAPHICS INC	1
		LOREN INDUSTRIES	1
		NATIONAL SIGN DISPLAY MANUFACTURERS INC	1
		PRO SIGNS INC	1
		SIGN COMMUNICATION	1
		SIGN RESOURCE	1
		SIGNS 2000	1
		SIGNS AND LUCITE PRODUCTS	1
		STAR SIDE DESIGN	1
		SUPERIOR ELECTRICAL ADVERTISING	1
		VOMAR PRODUCTS, INC.	1
		WIZARD ENTERPRISES	1
	339991	TRIM QUICK COMPANY	1
	339992	A SHARP SERVICES	1
	339993	SPS TECHNOLOGIES LLC	1
		TEXTRON FASTENING SYSTEMS SANTA ANA OPER	1
	339999	5 STAR REDEMPTION INC	1
		ADVANCED COSMETIC RESEARCH LABORATORIES	1
		ADVANCED MIRROR & DESIGN	1
		JERRY SOLOMON ENTERPRISES INC	1
		LOPEZ WOODWORKING	1
		MODEL WORKS, INC.	1
		PETROCHEM MANUFACTURING, INC.	1

Light Industry/Warehouse	339999	SOUTHWEST MILL & LUMBER	1
Miscellaneous Manufacturing Total			62
Motion Picture and Sound			
Recording Industries			
	512000	DOWNTOWN CENTER STUDIOS	1
	512110	ALMOST HUMAN INC	1
		ARCO FAC #09513, BP WEST COAST PRODS LLC	1
		FILM ILLUSIONS, INC	1
		GLOBAL DIGITAL MEDIA XCHANGE INC	1
		GOLDEN ERA PRODUCTIONS	1
		RHYTHM & HUES STUDIOS	1
		SHADOW ANIMATION, LLC	1
		UNIVERSAL CITY STUDIOS, LLC.	1
		WARNER BROS STUDIO FACILITIES RANCH	1
	512191	ASCENT MEDIA GROUP	1
		CREATIVE CHARACTER ENGINEERING	1
		DELUXE LABORATORIES	1
		LEGACY EFFECTS LLC.	1
		MPC CLEANERS, ISACK COHEN DBA	1
		POST LOGIC STUDIOS	1
Motion Picture and Sound Recording Industries Total			16
Paper Manufacturing			
	322000	GRAPHIC PACKAGING INTERNATIONAL, INC	1
	322121	FONTANA PAPER MILLS INC	1
	322130	ESSELTE CORPORATION	1
		SONOCO PRODUCTS CO	1
	322211	LIBERTY CONTAINER CO, KEY CONTAINER	1
		MONTEBELLO CONT CORP	1
		ORANGE COUNTY CONTAINER CORPORATION	1
		SUNCLIPSE INC	1
		SUNCLIPSE INC, ST HART/CORRU-KRAFT IV DIV	1
		TIN INC., TEMPLE- INLAND, DBA	1
	322214	GLOBAL COMPOSITIES INTERNATIONAL	1
	322222	AVERY DENNISON RESEARCH CENTER	1
	322223	ACCURATE PACKAGING, INC	1
		DELUXE PACKAGES	1
		DEMARIA ELECTRIC MOTOR SERVICES, INC.	1
		FORTIFIBER CORP	1
		GREAT AMERICAN PACKAGING INC	1
	322224	E-Z MIX INC	1
		E-Z MIX, INC.	1
	322232	NATIONAL ENVELOPE	1
	322299	AMERICAN GRAPHIC BOARD	1
		CANTERBURY PRODUCTS	1
		F-D-S MANUFACTURING CO INC	1
		HEXACOMB CORPORATION	1
		ZAPP PACKAGING, INC	1
Paper Manufacturing Total			25
Printing and Related Support			
Activities			
	323000	ADVANTAGE MAILING, INC.	1
		BAGCRAFT PAPERCON	1
		COLOR DIGIT	1
		D'ANDREA GRAPHIC CORP	1
		DIRECT EDGE SCREENWORKS INC	1
		EXTREME FINISHING	1
		FREEDOM GRAPHIC SYSTEMS INC	1
		JAY PETTET PRINTING	1
		KEYLINE LITHOGRAPHY INC	1
		MASTER GRAPHICS PRINTING	1
		MIR PRINTING & GRAPHICS	1
		OPTIMA 2 GRAPHICS INC	1
		PRINT RUNNER	1
		ROYAL PRINTEX , INC.	1
		SUPERPRINT LITHOGRAPHICS INC	1

Light Industry/Warehouse	323110	AA-ONE LITHOGRAPH INC.	1
		ADVANCED MARKETING PRINT AND MAIL	1
		ALPHA PRINTING & GRAPHICS INC.	1
		ANCHOR PRINTING	1
		AV GRAPHICS	1
		B & D LITHO CALIFORNIA INC	1
		C & L GRAPHICS	1
		CALIFORNIA COAST COLOR INC	1
		CALIFORNIA OFFSET PRINTERS	1
		CARR GRAPHICS INC DBA LITHO GRAPHICS	1
		CENVEO ANDERSON LITHOGRAPH	1
		CHINA TIMES PRINTING, INC	1
		CLASSIC IMAGE PRINTING, INC	1
		COLOR FX INC	1
		COLORNET PRESS	1
		CORONET PRINTING	1
		CREEL PRINTING COMPANY OF CALIFORNIA, INC	1
		CRT COLOR PRINTING INC	1
		CTR WEB PRINTING, INC.	1
		DIFATTA GRAPHICS	1
		DOT GRAPHICS	1
		EXACT PRINTING & BOX CO, INC	1
		FISHER PRINTING INC, CIRCULAR SPECIALIST	1
		GRAPHIC PRESS LLC DBA INSYNC MKTG. SOL	1
		GRIMDITCH GRAPHICS/ALL VALLEY PRINTING	1
		KENNY THE PRINTER	1
		KOYO GRAPHIC INTERNATIONAL INC	1
		LA WEB OFFSET PRINTING INC	1
		LITHOGRAPHIX INC	1
		LOS ANGELES PRINTING CENTER INC	1
		M & M PRINTED BAG INC	1
		M D PHARMACEUTICAL	1
		MACSON PRINTING & LITHOGRAPHY	1
		MADISON-GRAHAM COLORGRAPHICS INC	1
		METROMEDIA TECHNOLOGIES INC	1
		NATIONAL GRAPHICS PRINTING CO	1
		NATIONAL PACKAGING PRODUCTS	1
		NEXT DAY COLOR PRINTING INC	1
		PACE LITHOGRAPHERS INC	1
		PACIFIC GRAPHICS INC	1
		PENN INDUSTRIES, INC.	1
		PRINT TEK PRINTING & GRAPHICS	1
		QUALITY OFFSET	1
		QUEBECOR WORLD GREAT WESTERN PUBLISHING	1
		ROBINSON PRINTING AND CREATIVE MEDIA, INC	1
SHEARS LITHO, INC./COAST PRINTING INC.	1		
SOUTH WEST OFFSET PRINTING CO., INC	1		
STOUGHTON PRINTING COMPANY	1		
TAM PRINTING INC	1		
TECH COLOR GRAPHICS INC	1		
TEDCO PRINTING CO	1		
THE PRINTERY, INC.	1		
TREND OFFSET PRINTING SERVICES, INC	1		
VALLEY BUSINESS PRINTERS INC	1		
VALLEY PRINTERS INC	1		
VARIAN INC.	1		
VERTIS, INC	1		
WEST COAST LITHO	1		
WEST COAST PRINTING & GRAPHICS	1		
ZOO PRINTING	1		
323113	S&A CLASSIC WOOD FINISHING	1	
323119	4 OVER INC	1	
	CALIFORNIA SHIRT PRINTER INC	1	
	CONCEPTUAL TEXTILE PRINTING LLC	1	
	EARTH PRINT INC, COPY-RITE PRINTING DBA	1	
	HANDBILL PRINTERS DBA AMERICAN WEB	1	
	HARVEST PRODUCTIONS LTD	1	
	HEIDELBERG USA INC	1	

Light Industry/Warehouse	323119	ISLAND WAY INC, MORNING SUN SHIRT CO DBA	1	
		LITHOGRAPHIX INC	1	
		PICASSO PRESS	1	
		PRINTOGRAPH INC	1	
		R. R. DONNELLEY & SONS CO, LA MFG DIV	1	
		SIGNATURE FLEXIBLE PACKAGING INC	1	
		SPECTRA USA PRINT USA	1	
		TRICO CONVERTING, INC	1	
		Printing and Related Support Activities Total		91
		Publishing Industries (except Internet)		
		511110	CHINESE DAILY NEWS INC	1
			FREEDOM COMMUNICATIONS INC	1
			FREEDOM ORANGE COUNTY INFORMATION	1
			PACIFIC PALISADES POST, SMALL NEWSPAPER G	1
		511140	DIVERSIFIED PRINTERS INC	1
			VOLT INFORMATION SCIENCES INC	1
		511199	FINE ART SOLUTIONS INC	1
		Publishing Industries (except Internet) Total		7
		Specialty Trade Contractors		
		238000	AAA ELECTRIC MOTOR SALES & SERVICE INC	1
			AMERICAN PATRIOT ROOFING, INC.	1
			ANDERSON CHARNEKY STRUCTURAL STEEL, INC	1
			ARENA PAINTING CONTRACTORS, INC	1
	BALFOUR BEATTY CONSTRUCTION INC	1		
	BATAVIA FURNITURE REFINISHING	1		
	CALIFORNIA CUSTOM FINISHING	1		
	CEMEX CONSTRUCTION MATERIALS, LP	1		
	CJI PROCESS SYSTEMS	1		
	CUSTOM WOODWORKS, LOUIS BEDINI	1		
	DE PINHO ROOFING	1		
	DW FINISHING	1		
	EL CAPITAN ENVIRONMENTAL SERVICES	1		
	EMERALD ROOFING	1		
	FELIPE'S CUSTOM FINISHING	1		
	FINISH COLLECTION, F. DE LUNA DBA	1		
	GILS ROOFING, INC./ENT. PUBLIC STORAGE	1		
	GONZALEZ FINISHING	1		
	GRANITE CONSTRUCTION CO	1		
	IVAN'S CUSTOM FURNISHINGS	1		
	JESSE'S CUSTOM FINISHING	1		
	KASEY CUSTOM FINISHING CO.	1		
	L F COUNTRY CONSTRUCTION	1		
	LALO'S FINISH WORK	1		
	LAV FINISHING	1		
	LDL ENGINEERING INC	1		
	LER BROS CUSTOM FINISH	1		
	MAURICIO QUALITY FINISHING	1		
	MIDWEST FINISHES	1		
	PIZANO'S FINISHING	1		
	R3 INC., R3 CONSTRUCTION SERVICES	1		
	RABELO'S MASTER FINISHES	1		
	RAMIREZ FINISHERS	1		
	RODRIGO SANDBLASTING	1		
	SEACON CONSTRUCTION INC	1		
	SMITH ELECTRIC CO. INC	1		
238110	DAN COPP CRUSHING CORP.	1		
	DEMCON CONSTRUCTION	1		
	SHAW & SONS INC	1		
238120	BAFKO METAL INC	1		
	BRUNTON ENTERPRISES INC, PLAS TAL MFG CO	1		
	SO-CAL STRUCTURAL STEEL FABRICATION INC	1		
	STEEL TECH INDUSTRIAL CORP	1		
	WHITE'S STEEL, INC	1		
238130	ACE SHUTTER FINISHING, GREG V GERARDO	1		

Light Industry/Warehouse	238130	AL'S KITCHEN CABINETS, INC.	1
		AMERICA WOOD FINISHING	1
		ART WOOD	1
		CLOSET WORLD INC	1
		DESIGNS BY LIZOTTE	1
		EVANS CUSTOM MILLWORKS	1
		GAETA FINISHING CO	1
		GERHARD'S CUSTOM WOODWORKS INC	1
		K.O.C. CUSTOM CABINETS INC	1
		LOYA'S SHUTTERS FINISHING,ANTONIO LOYA D	1
238150	238160	PACIFIC DESIGNS & CABINETS, INC	1
		ROY E WHITEHEAD INC.	1
		SAINZ CABINETS, BENJAMIN SAINZ DBA	1
		SANTA FE FIXTURES, INC	1
		WORKING DESIGNS	1
		DINGMASTERS	1
		A. GUTIERREZ ROOFING	1
		AAA ROOFING BY GENE INC	1
		ADAIR ROOFING	1
		AL MILLER & SONS ROOFING CO. INC.	1
238210	238220	AVALON ROOFING, INC.	1
		BECKMAN METALWORKS, STEVE BECKMAN DBA	1
		CALIFORNIA EXTERIORS/ROOFING CONTRACTORS	1
		DIAL ONE WINDOW SPECIALISTS	1
		DRI COMMERCIAL	1
		EAGLE ROOFING PROD DIV/BURLINGAME IND.	1
		EMMONS ROOF SERVICE INC	1
		HULL & SONS ROOFING	1
		J.P. WITHEROW ROOFING	1
		LANG ROOFING INC	1
238220	238320	MAR VISTA ROOFING INC	1
		MASSIE ROOFING CO, INC.	1
		MESA ROOFING CORP	1
		ROOFTOPPERS, INC.	1
		ROSS-DOYLE INC	1
		RWS&P, ROYAL ROOF CO DBA	1
		SBB ROOFING, INC	1
		SKYCRAFT ROOFING INC	1
		SKYLINE ROOF CO INC	1
		VIKING ROOF SERVICE INC	1
238320	238320	R.M. ELECTRIC INC	1
		RIPON COGENERATION LLC	1
		SAUNDERS ELECTRIC INCORPORATED	1
		CONEX TRADING CO, INC CONEX ROOFING CO	1
		INDUSTRIAL CLEANING EQUIPMENT INC	1
		J E DEWITT INC, CL-795	1
		LA CITY DWP, CORDELIA P.S.	1
		LA CITY DWP, HOLLYWOOD P.S.	1
		LA CITY, HYPERION TREATMENT PLANT	1
		LA CITY, TOYON CANYON LANDFILL	1
238320	238320	MAX AUTO BODY SHOP, INC.	1
		MESA ENVIRONMENTAL INC	1
		SO CAL EDISON CO	1
		THE REYNOLDS GROUP	2
		THE SOURCE GROUP	2
		THE SOURCE GROUP INC	1
		THE SOURCE GROUP, INC	1
		THE SOURCE GROUP, INC.	1
		WHITTIER HOME ROOFING INC.	1
		A & A CUSTOM SHUTTERS	1
238320	238320	CHRIS CLEONI PAINTING	1
		COLOR ZONE DESIGNS	1
		COLORCODE	1
		CUSTOM PAINTING & DECORATING	1
		H & R TRUCK PAINTING	1
		LINCO INDUSTRIES	1
		MPC AUTO BODY SHOP	1
		PRO COATINGS	1

Light Industry/Warehouse	238320	R & J SPRAY PAINTING	1
		TERRY HUNT PAINTING & DECORATING INC	1
		WILSON & HAMPTON PAINTING CONTRACTORS	1
		MAPEI CORPORATION	1
		CAL ARTWOOD	1
		CUSTOM CARPENTRY INC	1
		CUSTOM FURNITURE & CABINETS INC	1
		ELEGANT MANUFACTURING	1
		FRANK'S HARDWOOD & MILLWORK	1
		GENERAL CUSTOM WOODWORKING,ALBERT GOLDIN	1
238340	238350	INTERIOR SOLUTIONS INC	1
		L & S CABINETS	1
		LEMUS DESIGN MFG, SERGIO LEMUS DBA	1
		LEXINGTON ACQUISITION	1
		PLUMBRIDGE CUSTOM CABINETS	1
		PRESTIGE INTERNATIONAL INC	1
		PRIME TECH CABINETS INC	1
		RILEY & COMPANY, DAN RILEY DBA	1
		ROBLES CABINETS	1
		SWISS WOODWORKING	1
238910	238910	TREASURE VISTA ENTERPRISES INC	1
		YEHUDA VAKNIN INC	1
		BOEING REAL PROPERTY MANAGEMENT	1
		CAMP, DRESSER & MCKEE INC.	1
		CLAYTON GROUP SERVICES, INC	1
		ENVIRON STRATEGY CONSULTANTS INC	1
		ENVIRONMENTAL RESOLUTIONS INC	1
		EQUILON ENTER. LLC DBA SHELL OIL PRODUCT	1
		EQUIPOISE CORPORATION	1
		GEOMATRIX CONSULTANTS	1
238990	238990	HOLGUIN, FAHAN & ASSOCIATES INC	1
		INTERIOR REMOVAL SPECIALIST	1
		LARRY JACINTO CONSTRUCTION, INC	1
		R. S. BILLS, INC	1
		RAPID GAS INC	1
		RINCON CONSULTANTS, INC.	1
		THE BOEING COMPANY-COMPTON FACILITY	1
		THE PLANNING CENTER	1
		THE REYNOLDS GROUP	1
		TRI-STAR DYEING AND FINISHING, INC..	1
238990	238990	ALL IN ONE FENCE	1
		ANGEL'S IRON WORKS, JOSE A ANGEL DBA	1
		ATLANTIC RICHFIELD COMPANY	1
		BURLINGTON ENGINEERING, INC.	1
		CALIFORNIA SANDBLASTING AND COATING, INC	1
		CHEVRON ENVIRONMENTAL MANAGEMENT CO	1
		COASTAL ROOFING CO INC	1
		CROWN FENCE CO	1
		DITTRICK CONSTRUCTION & CABINET	1
		EDDIE'S CABINETS	1
238990	238990	ELITE SANDBLASTING, GILBERT NUNEZ, DBA	1
		ENDLESS POWDER COATING	1
		EXPRESS WELDING & IRON WORKS	1
		F GAVINA & SONS INC	1
		FENCE PROS	1
		GABRIEL'S WROUGHT IRON,GABRIEL VILLAGOME	1
		GOMEZ SANDBLASTING	1
		IKON POWDER COATING	1
		RUBBERIZED CRACKFILLER SEALANT INC	1
		SANDFROG, LLC	1
238990	238990	SCENARIO DESIGN INC	1
		SHELL OIL PRODUCTS US-HSE/S&E	1
		STOUT WELDING & FABRICATION INC	1
		THE SCENIC EXPRESS INC	1
		THERMOGUARD CALIFORNIA INC	1
		UNITED FENCE & IRON	1
		WAYNE PERRY INC	1
		WAYNE PERRY INC.	1

Light Industry/Warehouse	238990	WAYNE PERRY, INC.	1
		ZINCATION, INC.	1
Specialty Trade Contractors Total			185
Textile Mills			
313210		COLOR MASTER PRINTEX, INC	1
		DAESHIN USA, INC./JAEWEON LEE	1
		PARADISE TEXTILE CO	1
		US NAMSUNG TEXTILE INC	1
		U-SUN USA, INC.	1
		WIMATEX, INC.	1
		ZION TEXTILES, LLC	1
313230		TEXOLLINI INC	1
313241		ANTEX KNITTING MILLS	1
313311		AMERICA WOOD FINISHES CORP	1
		ARTISTIC DYERS	1
		A'S MATCH DYEING & FINISHING	1
		CAITAC GARMENT PROCESSING INC	1
		FINAL FINISH INC	1
		HARRY'S DYE & WASH, INC	1
		HITEX DYEING & FINISHING, INC	1
		PACIFIC CONTINENTAL TEXTILES, INC.	1
		PACIFIC FABRIC FINISHING	1
		PRIMA-TEX INDUSTRIES INC	1
		SANTA MARGARITA COLLISION CENTER, LLC	1
		SOMITEX PRINTS OF CAL INC	1
		UNIVERSAL DYEING & PRINTING	1
		US TEXTILE PRINTING INC	1
		USDF	1
		WASHINGTON GARMENT DYEING & FINISHING	1
313312		COLORAMERICA TEXTILE PROCESSING, INC	1
		EXPO DYEING & FINISHING, INC.	1
		LAFAYETTE TEXTILE IND LLC	1
		TEXLON CORP	1
313320		CYTEC ENGINEERED MATERIALS INC	1
		ENGINEERED POLYMER SOLUTIONS INC	1
		PMR PRECISION MFG. & RUBBER CO., INC.	1
Textile Mills Total			32
Textile Product Mills			
314110		ATLAS CARPET MILLS INC	1
		BENTLEY PRINCE STREET INC	1
		FABRICA	1
		ROYALTY CARPET MILLS INC	1
314129		FOAM CRAFT, A DIV. OF FUTURE FOAM	1
314912		POLY-FIBER, CONSOLIDATED AIRCRAFT COATING	1
314999		AMERICAN FOAM FIBER & SUPPLIES INC	1
		EDMUND KIM PRODUCTION GROUP, INC.	1
Textile Product Mills Total			8
Warehousing and Storage			
493110		BOEING - LOS ANGELES DISTRIBUTION CENTER	1
		COSTCO WHOLESALE CORP	1
		DONGJIN AMERICA INC.	1
		HOWARD'S	1
		LASZLO SZUCS	1
		LIZ CLAIBORNE	1
		LOWES H I W OF PERRIS RDC	1
		THE AEROSPACE CORP, UNIT NO.04	1
493120		PREFERRED FREEZER SERVICES	1
493190		AMERIGAS PROPANE L.P.	1
		KINDER MORGAN LIQUIDS TERMINALS, LLC	1
		MASTER-HALCO INC	1
		SFPP, L.P. (NSR USE)	1
		SO CAL EDISON CO	1
		SO CAL GAS CO	1
		ULTRAMAR INC (NSR USE ONLY)	1
		WESTWAY TERMINAL COMPANY	1

Light Industry/Warehouse	Warehousing and Storage Total		17
	Waste Management and Remediation Services		
	562000	CHEP USA/BLUE CHIP RECYCLING	1
		ENI OIL & GAS INC	1
		ENV ASSESSMENT& REMEDIATION MGMT, INC.	2
		LA CITY, PUB WKS DEPT, SANITATION BUREAU	1
		NM COLTON GENCO LLC.	1
		UNITED PACIFIC WASTE	1
	562111	WASTE MGMT. HEALTHCARE SOLUTIONS OF CA	1
		ATHENS SERVICES	1
		REPUBLIC SERV OF CALIF LLC(CHIQUITA CAN)	1
		TAORMINA INDUSTRIES LLC	1
		WASTE MANAGEMENT OF SAN GABRIEL/POMONA V	1
		WASTE MANAGEMENT OF THE INLAND EMPIRE	1
		WASTE MANAGEMENT, INC.	1
	562112	EVERGREEN ENVIRONMENTAL SERVICES	1
	562119	CONSOLIDATED DISPOSAL SERVICES INC	1
		ORANGE COUNTY SANITATION DISTRICT	1
	562211	CROSBY & OVERTON, INC.	1
		FOSS ENVIRONMENTAL SERVICES	1
	562212	MM LOPEZ ENERGY LLC	1
		SAN ANTONIO MATERIALS, INC	1
		STERICYCLE, INC.	1
		SUNSHINE CANYON LANDFILL	1
	562219	U S A WASTE OF CAL(EL SOBRANTE LANDFILL)	1
		CITY OF LA, BOS, WASTEWATER COLL SYS DIV	1
		FLEXRIVERSIDE	1
		LA COUNTY SANITATION DIS	1
		LA CITY, BUREAU OF SANITATION	1
		LA CITY, DEPT OF GEN SERVICES	1
		LA COUNTY SANITATION DISTRICTS	1
		SO ORANGE CO WASTEWATER AUTHORITY-RTP	1
	562910	K2M MOBILE TREATMENT SERVICES INC	1
	562920	AMAZON ENVIRONMENTAL, INC.	1
		CITY OF LA BUREAU OF SANITATION	1
		CITY OF L. A., BUREAU OF SANITATION	1
		CITY OF LA, BOS, WASTEWATER COLL SYS DIV	1
		CITY OF LA, BOS, WASTEWATER COLL SYS DIV	1
		CITY OF LA/BOS, WASTEWATER COLL SYS DIV	1
		CITY OF LA/BUREAU OF SANITATION/WASTEWR	1
		COMMERCIAL FILTER RECYCLING, INC	1
		ENERTECH ENVIRONMENTAL CALIFORNIA LLC	1
		INDUSTRIAL SERVICE OIL CO INC	1
		L A CITY, BUREAU OF SANITATION	1
		WORLD WASTE TECHNOLOGIES INC	1
	562998	LA CO SANITATION DISTRICT	1
		LA CO., SANITATION DIST	1
		LA CO., SANITATION DIST NO. 2	1
		TERRA VAC CORP	1
Waste Management and Remediation Services Total			48
	Wholesale Electronic Markets and Agents and Brokers		
	425120	CASTRO DESIGNERS CHOICE	1
		RODRIGUEZ CAB SHOP	1
Wholesale Electronic Markets and Agents and Brokers Total			2
	Wood Product Manufacturing		
	321000	A&S FURNITURE MANUFACTURE	1
		ANDRES VELA REFINISH	1
		ARGENT CUSTOM FURNITURE	1
		ARTURO'S FINISHING, ARTURO CARDOZO DBA	1
		B D S FINISHING, JULIO C VALDEZ DBA	1
		EL TORITO FINISH, HECTOR GUARDIA DBA	1

Light Industry/Warehouse	321000	FINISHING CONCEPTS	1
		MOTORCADE INC, SAM SIMS, LAKEWOOD	1
		PRIMO WOODCRAFTS	1
		THE FAST STRIP	1
		THOMAS CRAVEN WOOD FINISHERS	1
	321113	INSIGNIA	1
	321114	CALIFORNIA CASCADE-FONTANA, INC	1
	321211	GEOSYNTEC CONSULTANTS INC	1
		POTTER ROEMER	1
		POWDERCOAT SERVICES INC	1
	321214	SIERRA BUILDING PRODUCTS, OLDCASTLE APG	1
	321900	ARTURO FINISHING	1
		BLACKLINE ENVIRONMENTS	1
		CLASSIC WOOD CREATIONS INC	1
		ELEMENTS OF STYLE	1
		INTERIOR WOOD DESIGNS, DON COLEMAN DBA	1
		JARMAN'S CUSTOM WALLCOVERING INC	1
		MUNOZ CUSTOM FINISHING, WULFRANO MUNOZ	1
		RICK RENDON	1
		SIMPSON SHOWCASE COMPANY	1
		YEHUDA VAKNIN INC	1
	321911	AVALON SHUTTERS INC	1
		M SHUTTERS COLORING	1
		SHERWOOD SHUTTER CORP	1
	321918	WOODWORKS CUSTOM SHUTTERS,MARCO ALBA DBA	1
		ALL QUALITY WOODWORK PROFESSIONALS	1
		AVALON SHUTTERS INC	1
		DAY STAR INDUSTRIES	1
		DESIGNS IN WOOD	1
		INTERIOR DOOR REPLACEMENT CO	1
		M. H. WOODWORK CO., INC.	1
		PEARLWORKS, INC.	1
		RENAISSANCE DOORS & WINDOWS	1
		THURSTON MILLWORK	1
	321991	HALLMARK SW CORP	1
	321999	A & J ALL WOODWORKS	1
		AGGRESSIVE DESIGNS	1
		ALL ABOUT WOOD	1
		BATAVIA TRADING CO	1
		COE & DRU INC	1
		DUTKO HARDWOOD FLOORS INC	1
	MASTER CRAFT WOODWORKS INC	1	
	MODERN WOODWORKS	1	
	OUTDOOR DIMENSIONS	1	
	QUALITY SHUTTERS INC	1	
	SOTELO'S PAINT CABINETS,GERARDO SOTELO	1	
	Wood Product Manufacturing Total	52	
Light Industry/Warehouse Total			1133
Retail/Service		Building Material and Garden Equipment and Supplies	
		Dealers	
	444000	HOME DEPOT #8988	1
		THE HOME DEPOT USA #1083, 3E CO. REG.	1
		WATERMAN SUPPLY COMPANY	1
	444110	ALAMEDA LUMBER INC.	1
		LOWE'S HIW INC	1
		TOP WOOD SHUTTERS INC	1
		VALENTINO'S SHUTTERS	1
	444120	ABSOLUTE CUSTOM PAINT	1
		BANNING MINI MART, GHULAM SARWAR DBA	1
		DESERT FIBERGLASS & PAINT INC.	1
		SILVER STAR ENT INC/QUALITY PERFORMANCE	1
	444130	ALCO TECH	1
	HOOVER WASHINGTON STATION, KIM KYUNG	1	
	VALLEY HARDWARE	1	
444190	ANGELUS BLOCK CO INC	1	

Retail/Service	444190	BERBERIAN DESIGN & CABINETS INC	1
		ELDORADO STONE	1
		PARGA CABINET DESIGN, FERNANDO PARGA DBA	1
		BIG PAPPAS OIL INC/GARDEN GROVE SER STN	1
	444220		1
		Building Material and Garden Equipment and Supplies Dealers Total	19
		Clothing and Clothing Accessories Stores	
	448110	OAKLEY INC.	1
	448120	G & M OIL CO, LLC #24	1
		KELLWOOD COMPANY	1
		SEPULVEDA WEST CAR WASH,D ZEBRACK UNION	1
		SHELL, A ARMASWALKER,PACOIMA SHELL#135727	1
		WOORI AUTO REPAIR	1
	448140	U. S. GARMENT, INC.	1
	448190	PRUDENTIAL OVERALL SUPPLY	1
		Clothing and Clothing Accessories Stores Total	8
		Couriers and Messengers	
	492000	FEDEX	1
	492110	ARCO FAC #09523 - PB INC	1
		FEDERAL EXPRESS	1
	492210	U S POSTAL SRVC, SAN BERNARDINO PRO&DIST	1
		UNITED PARCEL SERV	1
		Couriers and Messengers Total	5
		Electronics and Appliance Stores	
	443111	SIEMENS WATER TECHNOLOGIES CORP.	1
	443112	BERNARD AND SONS	1
		CITY OF ANAHEIM, WELL #53	1
		NEW CINGULAR WIRELESS PCS, AT&T MOBILITY	1
		VERIZON CALIFORNIA INC	1
		Electronics and Appliance Stores Total	5
		Food and Beverage Stores	
	445000	CONTESSA PREMIUM FOODS, INC.	1
		FRESH & EASY NEIGHBORHOOD MARKET, INC.	1
		KROGER FOOD4LESS	1
		STATER BROS. MARKETS	2
		VONS-A SAFEWAY CO, VONS FUEL CTR #2832	1
	445100	7-ELEVEN INC #33601	1
		7-ELEVEN INC#33611	1
	445110	A-EXPRESS #6159	1
		A-EXPRESS #6523	1
		ALAMO DISCOUNT STORE	1
	ALBERTSON'S EXPRESS #6158	1	
	ALBERTSON'S INC, A-EXPRESS #6734	1	
	ALLSTAR SHORTSTOP INC	1	
	AMERICAN GAS & MINI MART	1	
	CCR MARKET EQUIP & FIXTURES	1	
	CHAPMAN COLLEGE GAS & FOOD MART INC	1	
	CONOCOPHILLIPS CO #253739, KYUNG SO HAN	1	
	CONVENIENCE RETAILERS - 2705636	1	
	CONVENIENCE RETAILERS LLC - 2705244	1	
	EXXONMOBIL SS#18-JJJ/ROSE VALLEY INC	1	
	FOOD 4 LESS #343	1	
	FOOD 4 LESS #354	1	
	FOOD 4 LESS #358	1	
	FOOD 4 LESS STORE #775	1	
	GURUAAN LA II, LP	1	
	HARVEY'S GOLDEN LTRNR MRKT, BHATTI ENT.	1	
	KNC MKT INC, KNC GAS STATION DBA	1	
	MD CHEVRON, DUCM. INC.	1	
	QWIK KORNER DELI-GROCERY, INC	1	
	RALPHS GROCERY #171	1	
	RALPH'S GROCERY CO, FOOD 4 LESS #786	1	
	RALPH'S STORE #45	1	

Retail/Service	445110	S.A.N. OIL INC	1
		SANCHEZ MINI MART	1
		SPUNKY CANYON MARKET	1
		STANTON GAS & MART	1
		THE VONS CO INC	1
		TORITO FINISHING	1
		VONS FUEL CENTER #2596	1
		VONS FUEL CENTER #2688	1
		WINDY COVE VALERO	1
	445120	7-ELEVEN STORE #33436	1
		7-ELEVEN, INC.#33590	1
		7-ELEVEN #33092/MANJIT SINGH	1
		7-ELEVEN INC	2
		7-ELEVEN INC #16825/IJAZ KHAN-FRANCHISEE	1
		7-ELEVEN INC #23818/TARIOCHAN DEJERNETTE	1
		7-ELEVEN INC #32941/AJIT&RAJINDER THIND	1
		7-ELEVEN INC #33484	1
		7-ELEVEN INC #33584	1
		7-ELEVEN INC, #33459	1
		7-ELEVEN INC/7-ELEVEN #20314	1
		7-ELEVEN INC/7-ELEVEN #33151	1
		7-ELEVEN INC/7-ELEVEN #33547	1
		7-ELEVEN INC/7-ELEVEN #33552	1
		7-ELEVEN, INC	1
		7-ELEVEN, INC # 33500	1
		7-ELVEN INC/7-ELEVEN #33560	1
		ALLSUP'S CONVENIENCE STORE	1
		APPLE MARKETS INC, APPLE MARKET ONE DBA	1
		APPLE MARKETS INC, APPLE MARKET TWO DBA	1
		ARCO AM/PM #82419	1
		ARCO FAC #01110 - MAGDI MAHFOUZ	1
		ARCO FAC #01682 - RILLEY GAS & FOOD INC.	1
		ARCO FAC #05514, BP WEST COAST PRODS LLC	1
		ARCO FAC #05618, BP WEST COAST PRODS LLC	1
		ARCO FAC #09539, BP WEST COAST PRODS LLC	1
		ARCO FAC#05305-CLAUDE SHAMAAH	1
		ARCO FAC#09583-WAHIB MIKHAIL	1
		ATLANTIC RICHFIELD C/O DELTA ENVIRO. CON	1
		ATLANTIC RICHFIELD COMPANY. ARCO 01904	1
		BOSE & AVINDER, INC, KANGAROO FOOD MART	1
		CHEVRON DEALER, #90786, BAHMAN NATANZI	1
		CHEVRON STATIONS INC, #200734	1
		CIRCLE K STORES INC, SITE #2705911	1
		CONOCOPHILLIPS CO #253574, S D NAIEM DLR	1
		CONOCOPHILLIPS CO #2705693,JC&ML ENT INC	1
		CONOCOPHILLIPS CO, 76 STATION NO. 5251	1
		CONOCOPHILLIPS CO. # 255621,M. ANTENUCCI	1
		CONOCOPHILLIPS COMPANY - 255881/BEST	1
		CONVENIENCE RETAILERS LLC - 2700522	1
		CONVENIENCE RETAILERS LLC - 2705019	1
		CONVENIENCE RETALERS LLC - 2705699	1
		DUARTE FUEL INC.	1
		DUKE SERVICE STATION	1
		EASTER MARKET, CHANN CHAU DBA	1
		EQUILON DLR, CALIFORNIA SHELL,CHASE PETR	1
		EUCLID ARCO AM/PM	1
		EXXONMOBIL OIL CORP, #18838	1
		EXXONMOBIL OIL,#18-J9X M REZVAN, 12801	1
		EXXONMOBIL OIL,K. PEZESHK, #18-ECP/10980	1
		GALLIONS CASTAIC CNR, STEVEN GALLION	1
		JACK IN THE BOX, QS#7709	1
		JOSH'S VALERO	1
		MJS MARKET	1
		ONE STOP SHOPPE, HAKI DERVISHI	1
		SCOTTY'S GAS & FOOD	1
		SIMON'S MINI MARKET, ARCO DEALER	1
		SUPER STOP	1
		SURF CITY CHEVRON	1

Retail/Service	445120	TEXACO DLR, SHIVALIK INC, DBA	1
	445299	BARRANCA INVESTMENT INC/ARCO GAS MINI MA	1
		EXXONMOBIL OIL S/S 18-MLJ	1
	445310	7-ELEVEN INC, #33161	1
		Food and Beverage Stores Total	106
		Food Services and Drinking Places	
	722000	EDE ENTERPRISES, INC. DBA EVA'S SHELL	1
		EXCELLINE FOOD PRODUCTS	1
		MCI FOODS	1
		MOREHOUSECOWLES	1
		VENTURA FOODS LLC	1
	722110	AIR INDUSTRIES COMPANY, LLC	1
		ALE. SA CUSTOM SHUTTERS & CABINETS	1
		EMBASSY SUITES HOTEL- LA QUINTA	1
		EOP - 10960 WILSHIRE LLC	1
		EXXONMOBIL DLR,HAIFA HILU, 18-J1L/12047	1
		IL FORNAIO PANIFICIO	1
		IN N OUT CORP	1
		INTELLIGENTSIA COFFEE & TEA INC.	1
		JACK IN THE BOX INC. C/O JMM MGMT. GROUP	1
		JORDAN-BOTKE ENTERPRISE,PW ENVIRONMENTAL	1
		KINGS HAWAIIAN BAKERY	1
		NESTLE PREPARED FOODS CO	1
		SAN FAIR CLEANERS	1
	722211	CARL KARCHER ENTER. INC	1
		COSTCO WHOLESale CORPORAT	1
		FOOD 4 LESS #337	1
		FOOD 4 LESS STORE #362	1
		FOOD 4 LESS STORE #517	1
		JACK IN THE BOX INC	1
		JACK IN THE BOX INC 5349/QUICK STUFF7749	1
		JACK IN THE BOX INC. C/O JMM MGMT GROUP	1
		JACK IN THE BOX, QS #7708	1
		JACK IN THE BOX, INC.	2
		JACK IN THE BOX, INC. C/O JMM MGMT GROUP	1
		JACK IN THE BOX/QS 7745	1
		MITCHELL'S GAS & BURGER BOX	1
		UNIVERSITY FOOD MART	1
	722410	THE CHEESECAKE FACTORY	1
		Food Services and Drinking Places Total	34
		Furniture and Home Furnishings Stores	
	442110	A & E WOOD DESIGN INC	1
		AA FURNITURE	1
		ALBERTO'S FINE ART'S FURNITURE	1
		BY DESIGN FURNITURE	1
		CR CUSTOM CABINET DESIGN INC	1
		DESIGNER FINE FINISHES, DAN UPCHURCH DBA	1
		DIAMOND SHUTTERS	1
		J & J FURNITURE, JOSE PEREZ DBA	1
		MANDO'S FURNITURE INC	1
		ROYAL FURNITURE	1
		SHUTTERS TO GO, STEVE HANNS DBA	1
	442210	ARMCRAFT INCORPORATED	1
		ARMSTRONG WORLD INDUSTRIES INC	1
	442291	N.Y. UNIVERSAL DISTRIBUTORS	1
	442299	LEONARD'S CARPET SERVICE INC	1
		Furniture and Home Furnishings Stores Total	15
		Gasoline Stations	
	447000	A & S FUEL CORPORATION	1
		ALMA & AYDIN, INC. HAMID KESHAVARZ	1
		ANGEL'S GAS AND MART, SOON HWAN OH DBA	1
		ARCO #00203 -FARZAD YADOLLAHI & M SALEHI	1
		ARCO FAC #06305, BP WEST COAST PRODS LLC	1

Retail/Service	447000	AT CORPORATION	1
		AZUSA GASOLINE	1
		CANYON SERVICE & DETAIL INC	1
		CONOCOPHILLIPS K.S. 4000,	1
		D & L GAS, LOI C CHAU	1
		EAGLE GLEN MOBIL	1
		EXXONMOBIL DLR, WASMO RUN CORP.#10889	1
		EXXONMOBIL OIL CORP.#12997,YOUNG JOO KIM	1
		EXXONMOBIL,IBRAHIM MEKHAIL,#18-MKK/12687	1
		G & M OIL #156	1
		G&M OIL #154	1
		G&M OIL CO #133	1
		KING CHEVRON	1
		MASK CHEVRON	1
		MIDWAY TEXACO, A. GERGI & A. SHAMOON	1
		MURRIETA HOT SPRINGS SHELL	1
		NB OIL CO, INC #4	1
		NM USA INC., DASHDONDOG WAYNE	1
		NORTH PALM SPRINGS SHELL	1
		OAK VALLEY CHEVRON	1
		OCEAN GAS, D.E.J.H. INC.	1
		PEAK PETROLEUM INC, HAWTHORNE CHEVRON	1
		PETROLEUM MGMT. & MKTG. INC. (PMM INC.)	1
		ROCKET OIL #2	1
		SCOTT MURRIETA SERVICE STATION, LP	1
		SHELL, DLR MOHAMMED KASKAS	1
		SHERIF OSMAN INC., DBA MAGED CHEVRON	1
		SUMMERHILL OIL, INC	1
		TEROSO WEST COAST CO LLC #68101	1
		THRIFTY OIL CO	2
		THRIFTY OIL CO #286	1
		THRIFTY OIL CO #341	1
		THRIFTY OIL CO. #005	1
		THRIFTY OIL COMPANY	2
		THRIFTY OIL COMPANY # 027	1
		THRIFTY OIL COMPANY #345	1
		THRIFTY OIL COMPANY #351	1
		THRIFTY OIL COMPANY #353	1
		THRIFTY OIL COMPANY, #301	1
		UNITED OIL, RAPID GAS #57	1
		VONS FUEL CENTER #2660	1
		VONS FUEL CENTER, #2818	1
		WEST HILLS 76	1
		WOODLAND HILLS CHEVRON	1
		Z & R OIL COMPANY	1
447100		76 AUTO CARE/NORTHRIDGE, ANTONE NINO DBA	1
		A1 OIL, VINITA KAKKAR	1
		AIRGAS SPECIALTY GASES	1
		AL-SAL OIL CO., INC. #15	1
		AL-SAL OIL CO., INC. #16	1
		AL-SAL OIL CO., INC. #28	1
		AMERICAN GAS	1
		APRO LLC 34	1
		ARCO#09727 - MJS ENGEL NO 1 INC.	1
		AU GROUP INC/AU SHELL #121806	1
		AUTO RESORTS, LLC	1
		CARR & CARR INC, COACHELLA BEACON, DBA	1
		CENTRAL COAST OIL, LLC CALIMESA SHELL	1
		CHINO HILL OIL, INC/SAN CLEMENTE 76 DBA	1
		CITRUS CAR WASH, GARY B WIMMER	1
		CONICO RORO, INC/SHELL FACILITY	1
		CORONA BEACON	1
		DEEPZ INVESTMENTS, INC	1
		DELTA GASOLINE, ISMAELA M TANO DBA	1
		DOWNEY GAS/ EL-SHAHAWI GROUP, INC.	1
		F H GASOLINE	1
		FLAGG STATIONS INC	1
		FRONT FUELS COMPANY	1

Retail/Service	447100	GARDENA OIL	1
		HOLLYWOOD OIL CORPORATION	1
		J E DEWITT INC - #3	1
		J. E. DE WITT INC - CL 8	1
		JACO HILL CO.	1
		K B AUTO	1
		LIM'S GAS MART, LIM'S PRENA DBA	1
		MAGNOLIA PARK AUTOMOTIVE	1
		MAMANNE GAS & MART INC	1
		MK CHEVRON STATION, MAHMOOD KIBRIYA	1
		NASA OIL CORPORATION	1
		NEWELL INVESTMENT SVCS INC,VILLAGE STATN	1
		ORANGE FUEL, AARON VOJDANY	1
		PACIFIC FUEL/LEIGHTON HULL SHELL #120946	1
		PACIFIC FUEL/LEIGHTON HULL/SHELL #120813	1
		RAFFIS CHEVRON	1
		RITE FUEL	1
		ROGER'S ALLIANCE	1
		SHAZ AUTOMOTIVE	1
		SIMI KAMBOJ INC, #9515	1
		SUNLAND VALERO	1
		SUNSET SERVICE & TIRE CENTER	1
		TAWWAKAL CORPORATION	1
		TELLURIS INC	1
		TONY'S AUTOMOTIVE SERVICE	1
		TOPANGA VALU GAS	1
		U. S. GASOLINE, RAZI MOLLASALEHI DBA	1
		USA GAS #13 DBA AUTO BISTRO	1
		VINCENT ARCO	1
	447190	21ST CENTURY GROUP LLC, EUCLID SHELL	1
		4TH STREET SHELL	1
		7TH & VALLEY JOINT VENTURE/SHELL GAS STN	1
		A & H GAS CO INC #1	1
		A M F DISTRIBUTORS	1
		AL SAL OIL CO, INC. # 5	1
		AL SAL OIL CO., INC #21	1
		AL SAL OIL CO., INC. #19	1
		ALAMITOS BAY MARINE	1
		ALIFUAD HUSSAIN, EUCLID ARCO	1
		ALLAN STEWARD INC, 5 POINTS SHELL	1
		ALLEN VILLA MOBIL	1
		ALRON OIL CO., RON ROSE & AL ROSE DBA	1
		AL-SAL OIL CO INC #2	1
		AL-SAL OIL CO INC #24	1
		AL-SAL OIL CO., INC. #1	1
		AL-SAL OIL CO., INC. #13	1
		AL-SAL OIL CO., INC. #14	1
		AL-SAL OIL CO., INC. #20	1
		AL-SAL OIL CO., INC. #23	1
		AL-SAL OIL CO., INC. #27	1
		AL-SAL OIL CO., INC. #32	1
		AL-SAL OIL CO., INC. #7	1
		AL-SAL OIL COMPANY, INC. #48	1
		AMC PETROLIUM INC	1
		AMERICAN FUEL	1
		AMIN'S OIL INC	1
		ANAHEIM GASOLINE FOODMART & CARWASH	1
		ANTCHAU ARCO	1
		APRO LLC	1
		APRO LLC, APRO #33	1
		APRO, LLC #2	1
		ARAD OIL INC	1
		ARCO #01673 - A & B SERVICE STATION INC.	1
		ARCO #09675 - MOHAMMAD KASKAS	1
		ARCO 1905	1
		ARCO 1941	1
		ARCO 3041/SECOR INTERNATIONAL	1
		ARCO AM PM	1

Retail/Service

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ARCO AM/PM MORENO VALLEY	1
ARCO DLR, D VERDI & S YASHARIM	1
ARCO DLR, G & H GAS STATION	1
ARCO DLR, M SAYARI & M VERDI	1
ARCO FAC # 9608/ BATTIR OIL CO.	1
ARCO FAC #00192 - IBR INC	1
ARCO FAC #01260 - TINA CHAU & HUONG CHAU	1
ARCO FAC #01601, BP WEST COAST PRODS LLC	1
ARCO FAC #01941 - PRIME SMOG & REPAIR	1
ARCO FAC #03014 - SHEEVA INC	1
ARCO FAC #03042 - MJS ENGEL # 2 INC.	1
ARCO FAC #03076, BP WEST COAST PRODS LLC	1
ARCO FAC #05049, BP WEST COAST PRODS LLC	1
ARCO FAC #05110, BP WEST	1
ARCO FAC #05170 - GREWAL INVESTMENTS INC	1
ARCO FAC #05593, BP WEST COAST PRODS LLC	1
ARCO FAC #06085 - NGUYEN HUY LOC	1
ARCO FAC #06160, KHALI H ALI	1
ARCO FACILITY #09639/SOMERS GROUP, LLC	1
ARCO PRODUCTS C/O DELTA ENVIRO. CONSULTA	1
ARCO PRODUCTS CO # 5214, ALTORRE CORP.	1
ARCO PRODUCTS CO. C/O DELTA ENVIRO. CONS	1
ARCO PRODUCTS COMPANY	1
ARCO, FOSTER GAS	1
ATLANTIC RICHFIELD	1
ATLANTIC RICHFIELD CO	2
ATLANTIC RICHFIELD COMPANY	3
ATLANTIC RICHFIELD COMPANY (ARCO)	1
ATLAS ENVIRONMENTAL ENGINEERING, INC	1
AVALON OIL CORPORATION / ALI M. MOURAD	1
AZIZ CHEVRON SERVICE	1
AZUSA GASOLINE, KUMAR JAWA, NAKODAR INC.	1
BALDWIN PARK CHEVRON, HASSAN & SONS INC	1
BASIC PROPERTIES	1
BEL AIR OIL INC/ BEL AIR 76	1
BEST ARCO	1
BEVERLY CHEVRON, COR UNO INC.	1
BOYLE HEIGHTS SHELL & SUBWAY	1
BRENDA SCOTT CHEVRON	1
BRYAN ARCO,MORCOS KHALIL BENYAMIN	1
C & J OIL INC	1
CABRILLO CHEVRON	1
CABRILLO FUEL DOCK, LLC	1
CAL COAST INC	1
CALABASAS UNION CORP., AMIR AMIRIAN	1
CAPITAN, LLC ROXFORD CHEVRON	1
CEDAR MART & GAS	1
CENTINELA CHEVRON	1
CENTURY ARCO, ASHVINI AGGARWAL DBA	1
CHAHAYED SRV. INC, KWIK SERV GASOLINE	1
CHEVRON DEALER # 95998, C JAVAHERIAN	1
CHEVRON DEALER 90634, JITENDER S ROPERIA	1
CHEVRON DEALER 9-3357, BOURIS POULDAR	1
CHEVRON DEALER SIERRA MADRE OIL, #9-7762	1
CHEVRON DEALER, 98442, K YANKOWSKI	1
CHEVRON DEALER, BEHRAD DASHTI	1
CHEVRON DEALER, EDWARD O'SON #9-7460	1
CHEVRON DEALER, F SHEIKHPOUR #9-9125	1
CHEVRON DEALER, JAMAL SAYEGH #9-0477	1
CHEVRON DEALER, M SALEMINIK # 9-4279	1
CHEVRON DEALER, MOE GHANEIAN #202017	1
CHEVRON DEALER, SS # 9-2766	1
CHEVRON DEALER, SS#9-8643, RON COURREGES	1
CHEVRON DLR #99944, MATTHEW FROBISH	1
CHEVRON DLR, ALFRED BABABOGHOSSIAN	1
CHEVRON DLR, B KASRAVI SS#9-0817	1
CHEVRON DLR, BARRY'S CHEVRON, P A BARRY	1
CHEVRON DLR, BOB KASHANI #92860	1

Retail/Service

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CHEVRON DLR, BOB LINGLEY #9-6779	1
CHEVRON DLR, CHEVRON STATION 90561	1
CHEVRON DLR, F GHADOOSHAIY #9-0922	1
CHEVRON DLR, FAWAZ R ELMASRI	1
CHEVRON DLR, HARBANS SINGH #9-6311	1
CHEVRON DLR, HAROLD BUTLER SS#9-3532	1
CHEVRON DLR, JOHN VEGENIAN #20-2022	1
CHEVRON DLR, QUAN NELSON SS#9-3699	1
CHEVRON DLR, RAINBOW OIL #9-9003	1
CHEVRON DLR, ROBERT MEYER SS #851	1
CHEVRON DLR, SAMIR I EL-KHOURY	1
CHEVRON DLR, SS#9-1686, AZAR DOKHT RITA	1
CHEVRON DLR, SS#9-3673	1
CHEVRON DLR, SS#9-9010, WARREN SHINE DBA	1
CHEVRON DLR, SYLMAR CHEVRON, F FAIVAR	1
CHEVRON DLR, W P MICHAELIS CHEVRON	1
CHEVRON ENVIRONMENTAL MANAGEMENT CO	1
CHEVRON PROD CO INC, STATION # 90199	1
CHEVRON PRODUCTS CO SS# 21-1869	1
CHEVRON PRODUCTS CO STATION #91319	1
CHEVRON PRODUCTS CO, SS# 201093	1
CHEVRON PRODUCTS CO, STATION #91733	1
CHEVRON PRODUCTS CO, STATION #94360	1
CHEVRON PRODUCTS CO, STATION #98119	1
CHEVRON PRODUCTS COMPANY	1
CHEVRON PRODUCTS COMPANY #90154	1
CHEVRON PRODUCTS COMPANY #93162	1
CHEVRON PRODUCTS COMPANY SS#20952	1
CHEVRON SERVICE STATION #9-4863	1
CHEVRON SS# 21-0409	1
CHEVRON SS# 30-1784	1
CHEVRON SS# 30-2222	1
CHEVRON STATION #202016	1
CHEVRON STATION #202027	1
CHEVRON STATION #20-9515	1
CHEVRON STATION #93113	1
CHEVRON STATION #95619	1
CHEVRON STATIONS INC	1
CHEVRON STATIONS INC #94658	1
CHEVRON U S A SS#9-0236	1
CHEVRON USA INC	1
CHEVRON USA INC #7568	1
CHEVRON USA INC APSI #1404 SS#200913	1
CHEVRON USA INC APSI #1447 SS#200238	1
CHEVRON USA INC APSI #1483 #200374	1
CHEVRON USA INC #30-5025	1
CHEVRON USA INC #93050	1
CHEVRON USA INC #95753	1
CHEVRON USA INC SERV STA	1
CHEVRON USA INC SS #95348	1
CHEVRON USA INC, CHEVRON STN #9-0944	1
CHEVRON USA INC, SS #9-0864	1
CHEVRON USA INC, SS#9-9956	1
CHEVRON USA PROD.CO, STATION 9-3691	1
CHEVRON USA PRODUCTS CO-STATION # 202029	1
CHEVRON USA, INC #9-3910	1
CHEVRON USA, INC #99528	1
CHINA PETROL INC	1
CHINO VALLEY FUEL, INC.	1
CIRCLE K UNOCAL, RAINBOW SERVICE STATION	1
CLASSIC OIL INC	1
COLDWATER CHEVRON	1
CONOCO PHILLIPS,UNOCAL 76, KEVIN DYKSTRA	1
CONOCOPHILLIPS COMPANY	1
CONOCOPHILLIPS CO #4817	1
CONOCOPHILLIPS	1
CONOCOPHILLIPS # 255599, GALAXY OIL CO	1
CONOCOPHILLIPS #255076, GALAXY OIL CO	1

Retail/Service	447190		
CONOCOPHILLIPS #256145 ROBERT SADEGHI		1	
CONOCOPHILLIPS 251841,KINDCHANT INVESTME		1	
CONOCOPHILLIPS 254944 T. BOU-ABSI		1	
CONOCOPHILLIPS 2705947/MISSION VIEJO CAR		1	
CONOCOPHILLIPS AMER ROYAL PETRO #255230		1	
CONOCOPHILLIPS CO		3	
CONOCOPHILLIPS CO - 256733		1	
CONOCOPHILLIPS CO - 76 STATION # 0330		1	
CONOCOPHILLIPS CO - 76 STATION #4814		1	
CONOCOPHILLIPS CO # 255578, M&M SERVICE		1	
CONOCOPHILLIPS CO # 255599, E. J FARAH		1	
CONOCOPHILLIPS CO # 255833, AL-SAL OIL		1	
CONOCOPHILLIPS CO #255041, DAVID TAN DLR		1	
CONOCOPHILLIPS CO #256899,AL-SAL OIL CO		1	
CONOCOPHILLIPS CO #256926		1	
CONOCOPHILLIPS CO #257486,AL-SAL OIL CO		1	
CONOCOPHILLIPS CO #2657		1	
CONOCOPHILLIPS CO #2705694,FIELD ENERGY		1	
CONOCOPHILLIPS CO #3574		1	
CONOCOPHILLIPS CO 254359 K. HATHAIDHARM		1	
CONOCOPHILLIPS CO 254448 A, MANSWER		1	
CONOCOPHILLIPS CO 254613 BOB'S UNION INC		1	
CONOCOPHILLIPS CO 254814 O.M. OSMAN		1	
CONOCOPHILLIPS CO 254822 C. WEBSTER		1	
CONOCOPHILLIPS CO. 255435,GEORGES SEMAAN		1	
CONOCOPHILLIPS CO. 76 STATION # 3768		1	
CONOCOPHILLIPS CO. 76 STATION # 4992		1	
CONOCOPHILLIPS CO,LOS ANGELES GAS #30728		1	
CONOCOPHILLIPS CO.# 255567, MAJID NAZARI		1	
CONOCOPHILLIPS CO-251113 , D.S. UNION		1	
CONOCOPHILLIPS CO-255510 A.H.B. PROPER		1	
CONOCOPHILLIPS CO-255546-C.L. ROSANA		1	
CONOCOPHILLIPS COMPANY		32	
CONOCOPHILLIPS COMPANY - 256267		1	
CONOCOPHILLIPS COMPANY, 76 FACILIT# 6909		1	
CONOCOPHILLIPS COMPANY, 76 STAT # 5078		1	
CONOCOPHILLIPS COMPANY, 76 STATION #1065		1	
CONOCOPHILLIPS COMPANY, 76 STATION #63399		1	
CONOCOPHILLIPS COMPANY/76 STATION 6907		1	
CONOCOPHILLIPS P & R OIL INC # 252158		1	
CONOCOPHILLIPS, S. VARTANIAN, #256394		1	
CONOCOPHILLIPS, SS# 255044, M. K. MINAIE		1	
CONOCOPHILLIPS, Y MAHMOODZADE, #270575		1	
CONOCOPHILLIPS,GASIRAN, INC#255708-30961		1	
CONOCOPHILLIPS,KAMBIZ KATIRAI, #256082		1	
CRENSHAW CARSON INC		1	
DANA POINT FUEL DOCK, KDL SERV DBA		1	
DAY-CREEK ARCO		1	
DE SOTO GAS FOR LESS, AMRIT DHILLON DLR		1	
DEBORAH & TWINS INC		1	
DELTA GAS		1	
DESERT CENTER COMPANY		1	
DEWITT PETROLEUM - JEDI #13		1	
DOWNEY TEXACO, HEROS HAGOPIAN		1	
DUCM INC		1	
DUKE SERVICE CENTER		1	
EASTLAND CHEVRON, SKARIMI INC, T&N INC		1	
EQL/SHELL, GRANADA HILLS SHELL #135366		1	
EQLN/SHELL DLR,S ANABI,EDISON SHELL		1	
EQUILON DLR, AGOURA SHELL, B & P NATANZI		1	
EQUILON DLR, BLAINE SHELL, BOB MILLER		1	
EQUILON DLR, DAVID CHAO, CSC SHELL DBA		1	
EQUILON DLR, DEL AMO SHELL, SAMI MERHI		1	
EQUILON DLR, GARDEN GROVE SHELL #1, J HU		1	
EQUILON DLR, LIMONITE SHELL, D MASTAMAND		1	
EQUILON DLR, MOE SHELL II, A MOEZZI		1	
EQUILON DLR, ROSCOE AD SHELL, A DHILLON		1	
EQUILON ENTER., LLC, SHELL OIL PROD. U S		1	

Retail/Service	447190		
EQUILON ENTER.LLC,SHELL OIL PRODUCTS US		1	
EQUILON ENTERPRISES, PNP SHELL		1	
EQUILON SHELL DLR, DB OIL LLC #121022		1	
EQUILON/ W COVINA SHELL AUTO CARE#136250		1	
EQUILON/SHELL DLR, SAMMY VENTURE INC DB		1	
EQUILON/SHELL DLR,F.KIM/S.KIM DBA SIMA		1	
EQUILON/SHELL OIL PRODS US,KHOURY#121767		1	
EQUILON/SHELL OPUS,KELLY'S SHELL#135156		1	
ESMAT & FATEN, INC. SAM'S CHEVRON		1	
EXCALIBER FUELS #2		1	
EXCALIBER FUELS #3		1	
EXXONMOBIL # 11507 AMERICAN PETROLEUM		1	
EXXONMOBIL #12813, M2 UNITED INC		1	
EXXONMOBIL #17036, WARNER SVC INC		1	
EXXONMOBIL CORP / ETIC ENGINEERING INC		1	
EXXONMOBIL CORP, #18-DOD, #10888		1	
EXXONMOBIL CORPORATION		3	
EXXONMOBIL CORPORATION # 18-TM7, 19004		1	
EXXONMOBIL CORPORATION/ ETIC ENGINEERING		1	
EXXONMOBIL DLR #10872		1	
EXXONMOBIL DLR ,MIKE MORADI,18-F17,13009		1	
EXXONMOBIL DLR A SURKHABI #11159		1	
EXXONMOBIL DLR W LEE, AHN'S MOBIL#11097		1	
EXXONMOBIL DLR, BAO THO, # 11550		1	
EXXONMOBIL DLR, EDWIN SCOTT, SS# 11270		1	
EXXONMOBIL DLR, EFRAM DORI, #11200		1	
EXXONMOBIL DLR, HARRY YOUNG #10697		1	
EXXONMOBIL DLR, ISSAC TAWIL 11543,18-LM9		1	
EXXONMOBIL DLR, JIM JAMEEL #11340,18-MF6		1	
EXXONMOBIL DLR, K. HAIRABEDIAN #11253		1	
EXXONMOBIL DLR, M & T LIANG, SS# 18-KAJ		1	
EXXONMOBIL DLR, M. BADAWI, 18-FJE /1504		1	
EXXONMOBIL DLR, M. KOH, # 18-G4Y (10458)		1	
EXXONMOBIL DLR, N. GHAM # 11237		1	
EXXONMOBIL DLR, TONY R NASSAR		1	
EXXONMOBIL DLR,B KOHANTEB #18-L5K/12377		1	
EXXONMOBIL DLR,C. R. KHALIL,CHARLES SERV		1	
EXXONMOBIL DLR,F S MEHRDAD,#18-HV4,11525		1	
EXXONMOBIL DLR,G. HAWATMEH #18-LMQ/17862		1	
EXXONMOBIL DLR,GEORGE KILZI,12033,18-JQY		1	
EXXONMOBIL DLR,K HAIRABEDIAN #12091		1	
EXXONMOBIL DLR,K.ARSLANIAN,18-LTK,#11400		1	
EXXONMOBIL DLR,M. BASTAJIAN,18-JPL/11670		1	
EXXONMOBIL DLR,MARY A YOUSSEF,SS#11-ENY		1	
EXXONMOBIL DLR,NAZIH SIMAAN,12692,18-031		1	
EXXONMOBIL DLR,YOUNG J KI,#18-JPA(10329)		1	
EXXONMOBIL DLR/MIRZA BAIG #11506,18-JPE		1	
EXXONMOBIL OIL #10323		1	
EXXONMOBIL OIL #12240, SUNSET E & S INC		1	
EXXONMOBIL OIL CORP		2	
EXXONMOBIL OIL CORP # 19137		1	
EXXONMOBIL OIL CORP #10923		1	
EXXONMOBIL OIL CORP #11249		1	
EXXONMOBIL OIL CORP #11442		1	
EXXONMOBIL OIL CORP #11476		1	
EXXONMOBIL OIL CORP #11865 EMILE KHEIR		1	
EXXONMOBIL OIL CORP #11997, SUN YANG KIM		1	
EXXONMOBIL OIL CORP #12464,WEBROS ENTER.		1	
EXXONMOBIL OIL CORP #12887		1	
EXXONMOBIL OIL CORP #17885		1	
EXXONMOBIL OIL CORP #18-FSQ 12896		1	
EXXONMOBIL OIL CORP SS #18-TGI		1	
EXXONMOBIL OIL CORP, # 11463		1	
EXXONMOBIL OIL CORP, #10300		1	
EXXONMOBIL OIL CORP, #11394, IN KU LEE		1	
EXXONMOBIL OIL CORP, #12661,V. MANKERIAN		1	
EXXONMOBIL OIL CORP, #18-164 / 10009		1	
EXXONMOBIL OIL CORP, #18-833, #11420		1	

Retail/Service	447190		
EXXONMOBIL OIL CORP, #18-E1B (11238)		1	
EXXONMOBIL OIL CORP, #18-E50 / 11494		1	
EXXONMOBIL OIL CORP, #18-EHQ /11379		1	
EXXONMOBIL OIL CORP, #18-FLM / #17857		1	
EXXONMOBIL OIL CORP, #18-GEB, 12009		1	
EXXONMOBIL OIL CORP, #18-GN1/ 10800		1	
EXXONMOBIL OIL CORP, #18-KRX / 11395		1	
EXXONMOBIL OIL CORP, #18-L8P #11353		1	
EXXONMOBIL OIL CORP, #18-L90 / 12367		1	
EXXONMOBIL OIL CORP, #18-LA4, #13047		1	
EXXONMOBIL OIL CORP, C/O ETIC ENG INC		1	
EXXONMOBIL OIL CORP, M. CHAHAYED, #12439		1	
EXXONMOBIL OIL CORP, R. BEHROOZI #11751		1	
EXXONMOBIL OIL CORP, S.S.# 18-J5K		1	
EXXONMOBIL OIL CORP, SEUNG K. AHN,#10609		1	
EXXONMOBIL OIL CORP, SS #18-EM1 / 11503		1	
EXXONMOBIL OIL CORP, SS# 11430		1	
EXXONMOBIL OIL CORP, YOUNG JOO KIM,18-BA9		1	
EXXONMOBIL OIL CORP. #11354		1	
EXXONMOBIL OIL CORP. #11444		1	
EXXONMOBIL OIL CORP. #13042		1	
EXXONMOBIL OIL CORP., MOBIL S/S 18 MNF		1	
EXXONMOBIL OIL CORPORATION		22	
EXXONMOBIL OIL CORPORATION # 10193		1	
EXXONMOBIL OIL CORPORATION #10197		1	
EXXONMOBIL OIL CORPORATION #18-NTS 18821		1	
EXXONMOBIL OIL DLR #10643		1	
EXXONMOBIL OIL S/S#18-EP2, EMILE KHEIR		1	
EXXONMOBIL OIL, #11167, ZIBA INVEST CORP		1	
EXXONMOBIL OIL, ABBAS MOHAMMAD, #18-836		1	
EXXONMOBIL OIL, GEORGINA HANNE, SS#10397		1	
EXXONMOBIL OIL, H. KALHOR, #10879		1	
EXXONMOBIL OIL, M.GHANEIAN,18-824,#12515		1	
EXXONMOBIL OIL, S/S 18-VBV, 12746		1	
EXXONMOBIL OIL,10857, B&F WORLD IND INC		1	
EXXONMOBIL OIL,P. NOURIAN,#18-ETY,10494		1	
EXXONMOBIL OIL,S. DANESH, #18-174/13183		1	
EXXONMOBIL OIL,T.DERSEWEH,#18-912/10615		1	
EXXONMOBIL OIL/S.A. YASSINE, #18-E/13000		1	
EXXONMOBIL, E. HAIRABEDIAN,#18-L1L/10790		1	
EXXONMOBIL, MISSION VIEJO PETRO, #18-HL8		1	
EXXONMOBIL, Y SONG #11532		1	
EXXONMOBIL, Y. CHONG, 10864, #18-EKB		1	
EXXONMOBIL,A. HAIRABEDIAN,#18-LD4,17878		1	
EXXONMOBIL,ELIAS F BATSHON,#18-M10/11684		1	
EXXONMOBIL,GREG KALAJIAN,#18-HWM(10909)		1	
EXXONMOBIL,JERRY & ROSE INC,11-B4W,10385		1	
EXXONMOBIL,KHOURY'S MOBIL,N KHOURY 11363		1	
EXXONMOBIL,MASAO NAKAMURA,#11-L9C/11475		1	
EXXONMOBIL,NEWHOPE PETROLEUM INC,#17871		1	
EXXONMOBIL,R HASHEMI,GARDENA MOBIL 10628		1	
EXXONMOBIL,SAM SIMONIAN 11531, #18-HPJ		1	
EXXONMOBIL,STEVE HAIM #18-LEE 12410		1	
FAMILY OIL COMPANY		1	
FAROOQ IFTIKHAR, LA PAZ SHELL DBA		1	
FIELD PASADENA OIL CO, INC/HILL UNION 76		1	
FIRESTONE SHELL, MAROON BOUTROS DBA		1	
FOOTHILL CHEVRON - #90492		1	
FOSTER GAS STATION,VASKEN ARTINIAN DBA		1	
FREEWAY FUEL & FOODMART		1	
FRY'S HOLLYWOOD SHELL		1	
FRY'S NORTHRIDGE CHEVRON #91277		1	
FULLIN TREE INC		1	
G & M OIL #1		1	
G & M OIL CO #123		1	
G & M OIL CO #127		1	
G & M OIL CO #129		1	
G & M OIL CO #131		1	

Retail/Service	447190		
G & M OIL CO LLC #122		1	
G & M OIL CO, LLC # 87		1	
G & M OIL CO, LLC #14		1	
G & M OIL CO, LLC #15		1	
G & M OIL CO, LLC #23		1	
G & M OIL CO, LLC #28		1	
G & M OIL CO, LLC #30		1	
G & M OIL CO, LLC #38		1	
G & M OIL CO, LLC #4		1	
G & M OIL CO, LLC #51		1	
G & M OIL CO, LLC #58		1	
G & M OIL CO, LLC #71		1	
G & M OIL CO, LLC #81		1	
G & M OIL CO, LLC #88		1	
G & M OIL CO, LLC #91		1	
G&M OIL CO #135		1	
G&M OIL CO #137		1	
G&M OIL CO INC #134		1	
G&M OIL CO, LLC #111		1	
G&M OIL CO, LLC #113		1	
G&M OIL CO., LLC #114		1	
G&M OIL COMPANY #144		1	
GAREY CHEVRON, HASSAN & SONS, INC		1	
GAS & GO, HARI ALIPURIA DBA		2	
GAS OF AMERICA		1	
GAS PLUS-HEMET LLC		1	
GLOBAL OIL		1	
GNC PROPERTIES, ARCO AM/PM, DBA		1	
GRACH MINASIAN		1	
GRAND CHEVRON, BHUPINDER S MAC DBA		1	
GRAND DIAMOND SHELL		1	
H & M ONE STOP INC, H JACK KOKSHANIAN		1	
HARBOR CHEVRON, BHUPINDER S MAC DBA		1	
HARBOR FAIR STATION		1	
HARRY HAHN/FLORENCE STATION		1	
HASSAN & SONS INC, WALNUT CHEVRON DBA		1	
HELO CHEVRON		1	
HI SPEED OIL INC, HARBOR CHEVRON		1	
HIGHLAND CHEVRON, C H HOUSTON, LLC		1	
HIGHLAND RANCH SERVICE		1	
HILLSIDE MTR FUEL INC,HILLSIDE CHEVRON,D		1	
IMPERIAL STATIONS INC # 1		1	
INDIO TRUCK STOP		1	
INDO HARRIER, INC/FOOTHILL CHEVRON		1	
INLAND CHEVRON, HASSAN & SONS, INC		1	
IRVINE HAND CAR WASH		1	
IRVINE SERVICE STATION INC		1	
J H MOBIL SERVICE		1	
JACO OIL CO		2	
JOLUKAS INC		1	
KELLY'S SHELL, KHALIL KHOURY DBA		1	
KINDER MORGAN LIQUIDS TERMINALS LLC		1	
KRAEMER CHEVRON		1	
KRT MGMT INC/NORTHSTAR ENV. REMEDIATION		1	
L & L MARKET, S JARIWALA & K PATEL ETAL		1	
LA CANADA UNION INC.		1	
LAGUNA CHEVRON SERVICE,K.CAREY #9-1966		1	
LAGUNA HILLS UNION 76 SERVICE/DIPU HAQUE		1	
LEO'S AUTOMOTIVE		1	
LINCOLN GAS DLR, THOMAS GOUNTOUMAS		1	
LONG BEACH CITY, SHORELINE MARINE FUELS		1	
LOS ANGELES ARCO, MAMU INC, DBA		1	
M & M GAS STATION & MINI MART		1	
MAC CHEVRON (BHUPINDER S MAC)		1	
MADRONA CAR WASH, RAMESH G BAJARIS		1	
MANCHESTER 76 - ABE CORPORATION		1	
MARINA FUELS & SERVICE		1	
MARRZ OIL LLC/ ARCO FACILITY # 82271		1	

Retail/Service	447190		
MAYWOOD SHELL, MAROUN BOUTROS	1		
MD CHEVRON SERV STATION #3, DUC TRAN DBA	1		
MECCA TRAVEL CENTER	1		
MIKE'S CHEVRON, MOHAMMED ABDELNABY#9-1825	1		
MINA'S SHELL, RAMZY HANNAH DBA	1		
MKL CHEVRON	1		
MOBIL DLR, A NABIL	1		
MONTCLAIR CARWASH, K CAMPBELL	1		
MOTORCADE, INC.	1		
NARMS BABA CORP., ALPINE SHELL & SUBWAY	1		
NEWPORT COAST INC	1		
NIGROS SERVICE STATION	1		
NORTH PALM CANYON SHELL	1		
NORTHRIDGE 76, ANTONE E. NINO	1		
NOVA SHELL, WIESLAW S. STREKOWSKI, DBA	1		
NUMBER ONE FUEL	1		
ODELOS, INC./CHEVRON GAS STAT.	1		
OH SINGSON GROUP, INC.	1		
ONTARIO GAS & FOOD, P BAINS&C SINGH DBA	1		
ORTEGA HWY GAS/ORTEGA SHELL	1		
P & S MOBIL	1		
P.M. FUEL - A. JAMBAZIAN	1		
PACIFIC COAST HWY TRUCK STOP CENTER, INC	1		
PACIFIC OIL COMPANY	1		
PALM SPRINGS OIL CO #13 (UNION)	1		
PALM SPRINGS OIL CO #14	1		
PALM SPRINGS OIL COMPANY	1		
PALM SPRINGS OIL COMPANY STATION #9	1		
PALM SPRINGS OIL INC #12 (MAG GAS)	1		
PALM VALLEY SHELL, A. MOTLAGH, DBA	1		
PALMIRA ASSOC, INC. DBA TAMPA CHEVRON	1		
PALMIRA ASSOC., INC DBA MOORPARK CHEVRON	1		
PATHFINDER CHEVRON, MOHAMAD SALIMNIA DBA	1		
PILOT TRAVEL CENTERS LLC #307	1		
POMONA FUEL, SAMUEL AGHAZARIAN DBA	1		
PURE-EFFECT, INC.	1		
R. T. SMITH, INC.	1		
RAFI'S CHEVRON # 3, RAFAT A. SALIB	1		
RAFI'S CHEVRON # 4	1		
RAFI'S CHEVRON #91078 DBA RAFAT A SALIB	1		
RAMIREZ AUTO SERVICE CENTER	1		
RAPID GAS #12, UNITED OIL CO	1		
RAPID GAS #24	1		
RAPID GAS INC., UNITED OIL, #25	1		
RAPID GAS, INC. #79., UNITED OIL CO.	1		
RASHID & SONS INC	1		
ROSE DRIVE SHELL, A DAHER	1		
ROSEMEAD OIL CO	1		
S & M SERVICE STATION, INC	1		
SANTA MONICA CHEVRON	1		
SECOR INTL INC/ATLANTIC RICHFIELD CO	1		
SHARZAD PETROLEUM ENTERPRISES CORP	1		
SHEIK MAIZON CORPORATION	1		
SHELL DLR, G&M OIL CO, INC #10	1		
SHELL DLR, KAPRIYEL PAYLAN	1		
SHELL OIL PRODUCTS US	3		
SHELL OIL PRODUCTS US - HSE/S&E	5		
SHELL OIL PRODUCTS US ,ELM SHELL #12	1		
SHELL OIL PRODUCTS US ,SIERRA SHELL #10	1		
SHELL OIL PRODUCTS US, EQL ENT LLC	1		
SHELL OIL PRODUCTS US, NORCO SHELL #14	1		
SHELL OIL PRODUCTS US/HSE/S&E	1		
SHELL OIL PRODUCTS US-HSE/S&E	2		
SHELL OIL, FOODMART/CARWASH/DEL AMO	1		
SHELL OPUS,S.KIM, JERONIMO SHELL#121775	1		
SHERMAN CAR, INC	1		
SHOKER TRADING CORP/TRIPLE S CHEVRON	1		
SHRI RANCHHOD CORP	1		

Retail/Service	447190		
SMC (STAUFFER MANAGEMENT CO)	1		
SOCO PETROLEUM	1		
SOLLECO	1		
SOTO MOBIL MART INC	1		
SPYGLASS AUTOMOTIVE INC	1		
SUNLAND AUTO STATION, INC	1		
SUNLAND MOBIL, MARK KELISHADI	1		
SUN'S MARKET GAS & DIESEL	1		
TEMPLE CHEVRON, JAMES J PFEIL #9-0369	1		
TEMPLE CITY CHEVRON, HENRY WONG #202036	1		
TEMPLE CITY SERVICE STATION	1		
TETRA TECH, INC.	1		
THRIFTY OIL CO	2		
THRIFTY OIL CO #34	1		
THRIFTY OIL CO. #129	1		
THRIFTY OIL COMPANY	1		
TOPANGA CANYON CHEVRON, AMINDER RANDHAWA	1		
TRIPLE A GAS, INC, BROOKHURST CTR., MOBIL	1		
TUSTIN VALERO SERVICE CENTER	1		
ULTRAMAR DLR/OSCAR LESCHHORN	1		
UNITED OIL #14	1		
UNITED OIL CO., RAPID GAS #49	1		
UNITED OIL CO., RAPID GAS #54	1		
UNITED OIL., RAPID GAS # 44	1		
UNITED OIL, RAPID GAS #11	1		
UNITED OIL, RAPID GAS #20	1		
UNITED OIL, RAPID GAS #4	1		
UNITED OIL, RAPID GAS #66	1		
UNITED OIL, RAPID GAS #69	1		
UNIVAR USA INC	1		
US ROYAL OIL	1		
USA GASOLINE CORPORATION #44	1		
USA PETR CORP #5	1		
USA PETR CORP #51	1		
VALENCIA CHEVRON	1		
VALERO DLR JAMES LEE, JAMES SERVICE CTR	1		
VALERO STATION #3770	1		
VALLEY GAS & DIESEL, INC.	1		
VALLEY GAS, OLD TOWN STATION INC	1		
VALLEY'S UNION INC	1		
VALLEYWAY ARCO	1		
VENICE ARCO - MAYA EL-KHOURY	1		
VENICE SUPER PETROL	1		
VINTNERS DISTRIBUTORS, INC	1		
WADIH & KAWKAH SEMAAN	1		
WALPORT ENTERPRISES INC., ED O'SON	1		
WEST FLORIDA VALERO, HARRY JAVAHERIAN	1		
WESTERN GAS	1		
WHITE'S BLACK GOLD GAS STN - N.S. CHANDI	1		
WIE'S STATION	1		
WINALL OIL CO #2	1		
WORLD AUTO SERVICE	1		
WORLD OIL MARKETING CO #33	1		
WORLD OIL MARKETING COMPANY	1		
WORLD OIL MARKETING COMPANY #19	1		
WORLD OIL MARKETING COMPANY #28	1		
WORTMANN OIL CO	1		
ZOHURA CORP, E-Z SERVE FOODMART DBA	1		
(blank)	1		
Gasoline Stations Total		748	
General Merchandise Stores			
452000	COSTCO WHOLESALE CORP		3
	COSTCO WHOLESALE CORP.		1
	COSTCO WHOLESALE CORPORATION # 418		1
	COSTCO WHOLESALE CORPORATION # 627		1
452100	COSTCO WHOLESALE CORP./CO		1

Retail/Service	452100	SAM'S WEST, INC SAM'S CLUB #4941	1
		SAM'S WEST, INC, SAM'S CLUB #6240	1
	452111	J C PENNEY CO	3
		J C PENNEY CO, MONTCLAIR PLAZA	1
		MACY'S WEST, INC.	1
		SAKS FIFTH AV	1
		TARGET FONTANA DC-553	1
	452910	COSTCO WHOLESALE	2
		COSTCO WHOLESALE CORP	1
		COSTCO WHOLESALE CORPORAT	2
		COSTCO WHOLESALE CORPORATION	1
		COSTCO WHOLESALE CORPORATION # 437	1
		COSTCO WHOLESALE CORPORATION #447	1
		SAM'S WEST INC/SAM'S CLUB #4824	1
	452990	ARMY & AIR FORCE EXCHANGE SERVICE	1
	General Merchandise Stores Total		26
	Health and Personal Care Stores		
	446110	COSTCO WHOLESALE	1
		KAISER PERMANENTE	1
		VONS FUEL CENTER #2681	1
	446191	EQUILON ENTERPRISES LLC,SHELL OIL PRODS	1
	Health and Personal Care Stores Total		4
	Miscellaneous Store Retailers		
	453110	LA CITY DWP, LOS FELIZ P.S.	1
	453220	BLUEPOINT ENERGY PRTRNR LLC/EMBASSY STE	1
		CALIFORNIA STATE UNIVERSITY, FULLERTON	1
		HUNTINGTON BEACH CITY, WATER DEPT	1
		NBC UNIVERSAL	1
		PICO RENTS INC	1
		PROVIDENCE ST JOSEPH MED CTR	1
	453310	CAPELLI ANTIQUES, INC	1
		DEPAUL'S FURNITURE & REFINISHING	1
		PANACHE DESIGNS LLC	1
	453998	ANTHONY'S BODY SHOP	1
		CALIFORNIA FUEL MART	1
		ELECTRONICS PARTNERS CORPORATION	1
		EXXONMOBIL OIL CORP,B&L FUEL MART,#10453	1
		GRAND AUTO BODY & MECH,ISABEL LORENZANA	1
		JUST IN TIME CLEANERS & SHIRT LAUNDRY	1
		NON-STOP BODY SHOP	1
		ROHR INC, UNIT NO.01	1
		SOMERSET AUCTIONS	1
		SOUTH COAST FOAM SHAPES INC	1
		SOUTHERN CALIFORNIA BOILER INC	1
	Miscellaneous Store Retailers Total		21
	Motor Vehicle and Parts Dealers		
	441000	ARM & HAMMER COACH WORK'S	1
		CATAYAK	1
		FINAL TOUCH COACH WORKS LLC	1
		G & S AUTO ACCESSORIES, INC.	1
		INLAND KENWORTH	1
		VOGUE MOTORS	1
	441110	ALLEN OLDSMOBILE-CADILLAC INC	1
		ARTISAN HOUSE INC.	1
		AUTO SQUARE COLLISION	1
		AUTO-TECH COLLISION CENTER	1
		BARGAIN RENT-A-CAR,LEXUS OF CERRITOS DBA	1
		BUDGET RENT A CAR SYS INC #1422	1
		CAMINO REAL CHEVROLET	1
		CARMAX AUTO SUPERSTORES CA , LLC #7195	1
		CARMAX AUTO SUPERSTORES CA, LLC # 7120	1
		CENTER CHEVROLET, INC	1

Retail/Service	441110	CERRITOS IMPORTS INC,POWER VOLVO CERR.	1
		CORMIER CHEVROLET CO	1
		DESERT EUROPEAN MOTORCARS LTD	1
		EILEEN GOMEZ/GOMEZ FAC	1
		FORD OF UPLAND	1
		GALPIN MOTORS INC	1
		GENERAL MOTORS CORP	1
		HARRIS AUTOMOTIVE, INC.	1
		HI TECK AUTO BODY, MAGDY MICHAEL DBA	1
		HONDA CONNECTION	1
		HUNTINGTON BEACH DODGE INC	1
		KEYES MOTORS, VALENCIA LEXUS	1
		LONGO TOYOTA, D LONGO INC	1
		MARK CHRISTOPHER COMMERCIAL TRUCK CENTER	1
		MARTIN CADILLAC CO INC	1
		MCKENNA COLLISION CENTER	1
		MILLS FORD	1
		MOUNTAIN VIEW CHEVROLET, INC.	1
		N.G.P. MOTORS INC, SUNRISE FORD	1
		NORM REEVES HONDA	1
		PACIFIC FORD INC	1
		PENSKE CADILLAC	1
		PMB MOTORCARS, INC. PENSKE JAGUAR	1
		POWER CHEVROLET IRVINE	1
		POWER TOYOTA OF BUENA PARK	1
		RANCHO FORD LINCOLN MERCURY	1
		RANCHO SANTA MARGARITA TOYOTA	1
		REDLANDS AUTO CENTER, INC.	1
		RELIANCE TRUCK BODY & EQUIPMENT CORP	1
		RICHFIELD INC	1
		SADDELEBACK GOLF CARS, INC.	1
		SCHAIERS' NISSAN OF LONG BEACH	1
		SCOTT ROBINSON HONDA INC	1
		SCOTT ROBINSON HONDA/HONDA SERVICE CTR	1
		SHAVER AUTO CENTER	1
		SOUTH BAY BMW	1
		SUPERIOR NISSAN OF CARSON	1
		TOYOTA MOTOR SALES, USA INC.	1
		TOYOTA MOTORS ENG & MFG NORTH AMERICA	1
		TRI-BUICK, OPEL-PONTIAC INC	1
		US BODY SHOP, JUNG BAI KIM DBA	1
		WESTMINSTER AUTOMOTIVE GRP, HONDA WORLD	1
		7 DAY MARKET/CHEERS LIQUOR	1
	441120	ALDER AUTO BODY & REPAIR/ALDER ALVARADO	1
		AMERICAN MUSCLE CARS/SAL PEREZ	1
		AUTOMART COLLISION CENTER	1
		BEST CHOICE AUTO BODY&PAINT, A TAJERIAN	1
		BUYRITE	1
		CALIFORNIA Z CARS INC	1
		CARMAX AUTO SUPERSTORES CAL, LLC # 7129	1
		CARS TOUCH UP, JESUS A OCHOA DBA	1
		CLASSIC VISION RESTORATION	1
		CORVETTE SPECIALTY OF CALIFORNIA	1
		E & E IRON WORKS	1
		GARCIA'S AUTO DISMANTLER	1
		GOODWILL BODY SHOP & AUTO INTERNATIONAL	1
		JAUREGUI IMPORTS	1
		PARAMOUNT SHELL	1
		TRUCK DEPOT	1
		COACHMEN RV GROUP	1
	441210	RICHARDSON'S RV CENTERS INC	1
		TURNER'S TRUCK STUFF	1
	441229	SIGNATURE COMBS INC.	1
	441310	LINEX OF HUNTINGTON BEACH/VENABLE KONCEP	1
		SATELLITE BODIES	1
	441320	LUMARY'S TIRE SERV	1
		WHEELS AMERICA	1
	Motor Vehicle and Parts Dealers Total		83

Retail/Service		
Nonstore Retailers		
454113	AVON PROD. INC	1
	RK SPORT INC	1
454210	VENDING WORLD	1
454311	MILLION AIR NORTH, INC	1
454312	AMERIGAS	1
	MOBIL DLR DARIYOUISH(DANNY)KOHANOF,NEWHAL	1
454319	GREAT AMERICAN GAS	1
454390	CLEMENT- PAPPAS CA INC	1
	EASTERN MUNICIPAL WATER DISTRICT	1
	F. J. FOODSERVICE, INC.	1
Nonstore Retailers Total		10
Personal and Laundry Services		
812000	AFTER HOURS FORMAL WEAR	1
	AIDEN DRYCLEANERS	1
	ALL STAR CLEANERS	1
	APRIL'S CLEANERS	1
	ART'S CLEANERS, SOON C. SHIN	1
	ASHAHI CLEANERS DBA FELIX LEOS	1
	BEST CLEAN INC. FAULTLINE CLEANERS	1
	BEST CLEANERS	1
	BEST CLEANERS PATEL BAKUL	1
	BEST CLEANERS, PAUL S JUN DBA	1
	BIO SAFE CLEANERS, JUNG KIM	1
	BOULEVARD CLEANERS	1
	BOUQUET 2 CLEANERS	1
	BRYANT RANCH CLEANERS, R H CRYSTAL INC	1
	CALI FRESH CLEANERS	1
	CELEBRITY CLEANERS, GEORGE KUPELIAN DBA	1
	CENTINELA CLEANERS & LAUNDRY	1
	CHALY'S DRY CLEANERS, FRANCISCO CLEMENTE	1
	CHAMP CLEANERS	1
	CLAREMONT CLEANING VILLAGE	1
	CLEANERS R US, CHARMAINE SUNGLAO DBA	1
	COLONIES CLEANERS & SHIRT LAUNDRY	1
	CONTINENTAL CLEANERS, INC	1
	CROWN CLEANERS AND LAUNDRY	1
	CUSTOMER CLEANERS INC.	1
	DAY & NIGHT REMOVAL & CREMATION	1
	DRY CLEAN EXPRESS	1
	DRY-CLEAN EXPRESS, DIPTI PANDIT	1
	ECOGREEN CLEANERS	1
	ELEGANT CLEANERS	1
	EURO CLEANERS	1
	EXPRESS CLEANERS	1
	FAIRCHILD CLEANERS, INC.	1
	FASHION CLEANERS, JOSE RAMIREZ	1
	FAZIO CLEANERS, INC.	1
	FIFTH AVENUE CLEANERS	1
	FLAMINGO CLEANERS, INC.	1
	FREDERICK CLEANERS	1
	FRESH CLEANERS	1
	GALINDOS CLEANERS	1
	GEORGIO CLEANER	1
	GLORIAS DRY CLEANERS, GLORIA DIAZ	1
	GLORY CLEANERS, MICKEAL CHEHATA	1
	GOLDEN SPAS	1
	GOLDEN TOUCH CLEANERS, YOUNG CHO	1
	GQ CLEANERS, JOHN S DEBELAK DBA	1
	GREEN FEEL CLEANERS	1
	GREEN STAR CLEANERS	1
	GREEN VALLEY CLEANER	1
	HEARTLAND PET CREMATORY, G.H. REINART	1
	HERITAGE CLEANERS	1
	HI TECH DRY CLEANERS, OLGA RAMIREZ	1

Retail/Service		812000	
	HI-TEK CLEANERS		1
	HUNTINGTON CLEANERS, MARY ANN KIM DBA		1
	JONATHAN'S		1
	KALMIA CLEANERS LLC		1
	KENNY'S CLEANERS		1
	KINGDOM CLEANERS		1
	KONA CLEANERS		1
	LA CRESTA CLEANERS, BILL YIM DBA		1
	LA SIERRA VERDE CLEANERS		1
	LAKEVIEW CLEANERS, DAVEN PATEL		1
	LEGACY 1 HR CLEANERS		1
	LE'S ONE HOUR CLEANER		1
	LEWIS CLEANERS		1
	LINDA PLAZA CLEANERS		1
	LUCKY CLEANERS		1
	M & M CLEANERS, T NGUYEN		1
	M & V CLEANERS, MARRYANNE DAYOAN		1
	M.G.M.CLEANERS #1, NSHAN POGOSYAN		1
	MAIN CLEANERS, ERICA YOUN		1
	MARS FABULOUS CLEANERS		1
	MARVIN'S CLEANERS		1
	MASON CLEANERS, ARUSYAK ADZHAN		1
	MASTER CLEANERS, GINA KIM DBA		1
	MIRAGE CLEANERS		1
	MITCHELL NALLIN DBA THE HILLS CLEANERS		1
	MY DRY CLEANER - JAIME MARTINEZ		1
	NAUTICA CLEANERS		1
	NEWPORT HILLS CLEANERS		1
	NICK'S DRY CLEANERS, DONG Y OH DBA		1
	NU-WAY CLEANERS		1
	ON BROADWAY CLEANERS		1
	ORGANIC CLEANERS		1
	PARAMOUNT T CLEANERS		1
	PATTERSON CLEANERS/AVEDIS SUREKEN		1
	PATTY'S CLEANERS		1
	PIALAGO CLEANERS		1
	PICCADILLY CLEANERS, SEVAN SETIAN		1
	PLAZA CLEANERS, YOUNG HWA KANG DBA		1
	POLO CLEANERS, DON DONGSOON MYUNG		1
	PRESTIGE CLEANERS, JUNG HO SON		1
	PRICELESS CLEANERS		2
	PRIME CLEANERS ONE, DBA SUZA, INC.		1
	RAMONA CLEANERS		1
	RITZ CARLTON LAGUNA NIGUEL		1
	ROCKET CLEANERS		1
	ROJAS CLEANERS		1
	ROSE CLEANERS, STEVE PARK		1
	ROYAL CLEANERS MARIBEL RUIZ		1
	ROYAL CLEANERS/PIYUSH & NUTAN KHANA		1
	ROYDESH, INC. DBA CROWN LINEN		1
	SANG Q CLEANERS		1
	SCOTT'S REGAL CLEANERS		1
	SCV CLEANERS		1
	SEA CREST CLEANERS		1
	SHALOM ENT INC, MURRE CLEANERS DBA		1
	SHATTO CLEANERS, HAN SOUNG KIM		1
	SILVER HANGER CLEANERS		1
	SKY COUNTRY CLEANERS		1
	SLOANS DRY CLEANERS ANDRES HERNANDEZ DBA		1
	SNOW WHITE CLEANERS, WON		1
	SPIC N SPAN DRY CLEANERS/GILBERT HWANG		1
	SPIC-N-SPAN CLEANERS, DAVEN PATEL		1
	STAR CLEANERS		1
	SUMMIT/KLEANERETTE CLEANERS		1
	SUNNY CLEANERS		1
	SUPERIOR CLEANERS, DAN ARAIZA DBA		1
	SWAN CLEANERS, JAE JUNG CHO DBA		1
	TELE CLEANERS		1

Retail/Service	812000	THE CORNER CLEANERS	1
		TJ CLEANERS, THEODORE ALBERT MASANGCAY	1
		TRABUCO HILLS CENTER CLEANERS	1
		TROJAN CLEANERS & LAUNDRY	1
		TVC CLEANERS, RC EXPRESS DRY CLEANING	1
		UNITED CLEANERS, BEVERLY PLUS CLEANERS I	1
		V & R CLEANERS & LAUNDRY	1
		VALENCIA CLEANERS, LETICIA BARRAGAN	1
		VALLEY CLEANERS, MARILYN BELONIO DBA	1
		VELVETONE CLEANERS	1
		VENICE CLEANERS	1
		VIP CLEANERS	1
		WILLIAM'S CLEANERS	1
		WINCHESTER CLEANERS, KWANG HWAN LEE DBA	1
		WOW CLEANERS	1
	812112	ALPHA CLEANERS, ARMANDO RUBIO	1
		T-MOBILE USA INC	1
	812199	HUNTINGTON BCH, CITY, CENTRAL PARK SPORT	1
	812210	HUNTER-PEREZ MORTUARY	1
		SOUTHLAND CREMATORY	1
	812220	COACHELLA CITY, SANITARY DIST PLANT	1
		FOREST LAWN MEM PARK ASSOC	1
		MACERA CREMATORIUM INC	1
		ROSE HILLS CO	1
	812300	FLAMINGO CLEANERS, E. SEKEBOGLU	1
	812310	BROCKTON CLEANERS	1
		CLEAN 4 LESS	1
		COYOTE HILL CLEANERS	1
		CROWN CLEANERS	1
		DOLLAR CLEANERS INC	1
		FINAL TOUCH DYEING & FINISHING	1
		FOASBERG LAUNDRY & CLEANERS INC	1
		GREEN CLEANERS, JOSEPH LEE	1
		HARBOUR CLEANERS, S SEMERCIAN	1
		LA CLEANERS, FARAMARZ GHOLIAN DBA	1
		LA SIERRA PLAZA CLEANERS, B. CHO, DBA	1
		METROPOLITAN CLEANERS, G. GORODETSKY, DBA	1
		RADIANT SRVS CORP, EL SEGUNDO CLNRS/LDRY	1
		SEABREEZE CLEANERS	1
		SIGNATURE CAPITAL INV TRUST, SIGNATURE CL	1
		SNOW WHITE CLEANERS	1
		SOUTHBAY SUEDE & SPECIALTY CLEANERS	1
		SWISS CLEANERS	1
		THE CLEANERS- MT. WASHING	1
		TOWN WASH LAUNDRY INC	1
		VILLAGE CLEANERS, CHOM SUK YU	1
		YORBA CANYON CLEANERS	1
	812320	20/20 CLEANERS	1
		5 STAR QUALITY CLEANERS	1
		A PLUS CLEANERS, IK MYUN JANG	1
		A-1 CLEANERS	1
		A-1 CLEANERS, MARIA HERNANDEZ	1
		ACE CLEANERS	1
		ACE CLEANERS, SAE W PARK, DBA	1
		AGOURA CLEANERS	1
		AIDA'S CLEANERS	1
		AJAY CLEANERS, JAYESH K PATEL	1
		AL PHILLIPS THE CLEANER	1
		ALISO HILLS CLEANERS	1
		ALL AMERICAN CLEANERS, C. BRENNAN	1
		ALL THAT GLITTERS, ENTER., LLC	1
		ALL WORLD CLEANERS	1
		ALLEN'S CLEANERS & LAUNDRY	1
		ALPER CLEANERS, HERMILA CHOMSINSUB DBA	1
		AMERICAN DYE HOUSE	1
		AMERICAN DYE HOUSE, INC.	1
		ANGEL'S CLEANERS	1
		ANNA'S DRYCLEANING, ANNA D'ALESSIO	1

Retail/Service	812320	ANZA CLEANERS, KAREN KIM DBA	1
		A-ONE CLEANERS	1
		A-TEAM CLEANERS	1
		AVIVA CLEANERS, YOUNG BAE YANG DBA	1
		B B CLEANERS, CHOONG JIN LEE DBA	1
		BARONET CLEANERS	1
		BEAR VALLEY CLEANERS, SA HYUN KIM DBA	1
		BEASLEY'S CLEANERS	1
		BELLA CLEANERS	1
		BELLA CLEANERS, CHAE YUN DBA	1
		BEN CLEANERS, HAMID GHORSHINEJAD DBA	1
		BERKELEY CLEANERS	1
		BERKLEY SQUARE CLEANERS, NEUNG TOM SUH DB	1
		BEST CLEANERS, SUNNYU PARK DBA	1
		BEVERLY HILLS CUSTOM CLNRS	1
		BEVERLY PLUS CLEANERS	1
		BLU WHITE CLEANERS & LAUNDERS	1
		BLUE RIBBON CLEANERS	1
		BOB'S CLEANERS	1
		BONNIE'S COURTESY CLEANERS	1
		BOUQUET CLEANERS, HARUTYAN BICAKCI DBA	1
		BOWERS CLEANERS/COTTON CLUB CLEANERS	1
		BREA MARKETPLACE CLEANERS, Z NOVRUZYAN DB	1
		BRENTWOOD VILLAGE CLEANERS, KI SU KIM DBA	1
		BRITE CLEANERS	1
		BRYAN'S CLEANERS & DYERS INC	1
		BY THE SEA CLEANERS, ARET ELBICER DBA	1
		C & R CLEANERS	1
		C QUALITY CLEANERS, CAROLINA CANTE	1
		CALIF SUPER CLEANERS	1
		CALIFORNIA CLEANERS, CAA HOLDINGS LLC	1
		CAMPUS CLEANERS, D MARKARIAN	1
		CANYON CLEANERS, CHONG SAM LEE	1
		CANYON CLEANERS, SANG KYU KIM DBA	1
		CANYON CREST CLEANERS, J LEE & THOMAS LEE	1
		CAPRI CLEANERS, JAMES ALEXANDER CHIANIS	1
		CARRIAGE CLEANERS, SHIN CHUNG HYUN, DBA	1
		CARRIAGE TRADE CLEANERS, L AZNAVOUR, DBA	1
		CATALINA CLEANERS, M F BASSIR, DBA	1
		CELEBRITY CLEANERS	1
		CELEBRITY CLEANERS, JOSE & A VERGARA	1
		CERRITOS ONE HOUR CLEANERS, OK SOON PARK	1
		CHANNEL CLEANERS	1
		CHERBONE CLEANERS, LAWRENCE BERGERON DBA	1
		CHOE'S CLEANERS, YOUNG CHO KIM	1
		CIRCLE DRY CLEANING	1
		CITY EXPRESS CLEANERS	1
		CK CLEANERS	1
		CLASSIC CLEANERS	4
		CLASSIQUE CLEANERS, NAM LE DBA	1
		CLEANERCO	1
		CLEANERS CLUB, INC	1
		CLENET CLEANERS	1
		CLOUD 9 CLEANERS	1
		CLUB CLEANERS, DURSUN ERGUN, DBA	1
		COAST CLEANERS	1
		COFFEE BROTHERS INC	1
		COLLEGE CLEANERS	1
		CONCIERGE DRY CLEANERS	1
		CONTINENTAL 1-HOUR CLEANERS	1
		CONTINENTAL 1HR CLEANERS	1
		CONTINENTAL CLEANERS	2
		CONTINENTAL CLEANERS, MAGGIANI ENT INC	1
		COOLEY PLAZA CLEANERS, SURENDRA PATEL	1
		COPPERHILL CLEANERS	1
		CORONA CLEANERS	1
		COUNTRY CLEANERS	1
		COUNTRY CLEANERS, CTG INVESTMENT INC	1

Retail/Service	812320		
COUNTRY CLUB CLEANERS, J K OH, DBA		1	
COUNTRY HILLS CLEANERS		1	
COURTESY 1 HOUR CLEANERS		1	
COURTESY CLEANERS		1	
COURTYARD CLEANING BARON,D.L.PATEL DBA		1	
COURY & SON CLEANERS, ESTER SOON OK SHIN		1	
CREIGHTON'S CLEANERS		1	
CREST CLEANERS, FIRAS ALDAYYAT, DBA		1	
CRESTMONT CLEANERS		1	
CROWN CLEANERS		1	
CROWN CLEANERS, CLEANERS CONNECTION, INC		1	
CRYSTAL CLEANERS		2	
CRYSTAL CLEANERS, KYO IM KIM		1	
CRYSTAL CLEAR CLEANERS		1	
CULVER CLEANERS, HYUN JU CHA DBA		1	
CUSTOM CLEANERS		1	
DANA POINT CLEANERS DAVID EUN LEE		1	
DEBBIE'S IMPERIAL CLEANERS, C SANDOVAL		1	
DEL AMO CLEANERS		1	
DESERT DISCOUNT CLEANERS		1	
DEUX AMIS INC, EFFREY'S CUSTOM DRY CLEAN		1	
DEVONSHIRE WEST CLEANERS		1	
DIAMOND CLEANERS		1	
DICK'S CLEANERS		1	
DLJ ENTERPRISE INC, SAME DAY CLEANERS DBA		1	
DOHENY DRY CLEANERS		1	
DOLLAR WISE CLEANERS, F TALEHAKIMI DBA		1	
DON'S CLEANERS		1	
DOOR TO DOOR VALET CLEANERS, Y VEERA DBA		1	
DOVE MASTER CLEANERS, RICHARD NOH DBA		1	
DOWNEY CRYSTAL CLEANERS		1	
DR. CLEANER, IHN GUL YOON		1	
DRY CLEAN CALIFORNIA		1	
DRY CLEAN CLUB, INC		1	
DRY CLEAN CLUB, LLC		1	
DRY CLEAN EXPRESS		2	
DRY CLEAN EXPRESS, PHUNG HUYNH DBA		1	
DRY CLEAN X-PRESS		1	
DRYCLEAN EXPRESS CLEANERS, KYUHONG LIM		1	
DUPON'S CLEANERS, THU NGUYEN		1	
DYNASTY CLEANERS		1	
EAGLE GLEN CLEANERS		1	
EAST HILLS CLEANERS, JOSEPH K. LEE, DBA		1	
EBENEZER CLEANERS		1	
ECOUNTRY CLEANER		1	
EL RANCHO CLEANERS		1	
ELEGANTE CLEANERS, M. SALVINI & R. LATA		1	
ELITE CLEANERS		4	
EMERALD CLEANERS, A & H HAKIMDAVAR		1	
ESPRIT CLEANERS INC		1	
EVERGREEN CLEANERS		1	
EVERGREEN NATURAL CLEANERS; R. ARELLANO		1	
EXPRESS CLEANERS		3	
EXPRESS CLEANERS, FRED YU DBA		1	
FAIR OAKS CLEANERS		1	
FAIRVIEW CLEANERS		1	
FALCON RIDGE CLEANERS & SHIRT LAUNDRY		1	
FAMILY CLEANERS		1	
FASHION CLEANERS # 2		1	
FASHION CLEANERS, JOHN YANG		1	
FAZIO CLEANERS, INC		1	
FAZIO INC, FAZIO CLEANERS DBA		1	
FLAIR CLEANERS		1	
FLAIR CLEANERS INC		1	
FLAIR CLEANERS INC.		1	
FLAIR CLEANERS, INC		1	
FLAIR INC, FLAIR CLEANERS		1	
FLAIRE ONE HOUR CLEANER		1	

Retail/Service	812320		
FLETCHER'S DRAPERY CLEANING		1	
FOASBERG LAUNDRY & CLEANERS INC		1	
FORD CLEANERS		1	
FORMOSA CLEANERS		1	
FOUR SEASONS CLEANERS & LAUNDRY		1	
FOUR SEASONS CLEANERS, YOUSEF J BERAL ETC		1	
FRANCISCO'S DRY CLEANERS, KY YONG KIM		1	
FRESH CLEANERS, JAMES SONG		1	
FULTON CLEANERS		1	
G & G INVESTMENTS, REGAL CLEANERS		1	
GALAXY CLEANERS		1	
GATEWAY CLEANERS		1	
GATEWAY CLEANERS, JI EUN KIM DBA		1	
GATEWAY CLEANERS, ROBIN RIX DBA		1	
GLORY CLEANERS		1	
GOLDEN CLEANERS, KWANG Y LEE DBA		1	
GOLDEN SPRINGS CLEANERS		1	
GOLDEN STAR CLEANERS		1	
GOLDENWEST LAUNDRY AND VALET SERVICES IN		1	
GOOD HANDS CLEANERS		1	
GRACE CLEANERS		1	
GRANER OIL CO EL SEGUNDO #1 & #2		1	
GREEN CLEANERS, JOSEPH LEE DBA		1	
GREEN HILLS CLEANERS, CHI WON LEE DBA		1	
GREEN WORLD CLEANERS		1	
H & K IMPERIAL CLEANERS, INC		1	
HALVORSON'S CLEANERS, M N LEE, DBA		1	
HANGER CLEANERS, STOAN ENTERPRISES INC		1	
HAPPY CLEANERS		1	
HAPPY HANGER CLEANERS, HENRY TO, DBA		1	
HENRY'S CLEANERS, M PEREZ, R MORALES DBA		1	
HIGHLAND EXPRESS CLEANERS		1	
HILL TOP CLEANERS, JAE HA LEE, DBA		1	
HILLSIDE CLEANERS		1	
HI-Q CLEANERS, DO JUN LEE, DBA		1	
HI-TECH CLEANERS #1		1	
HI-TECH CLEANERS #6		1	
HOLLY HILLS CLEANERS, SUNG KWON CHOI		1	
HOLLYWOOD HILLS CLEANERS, MIKE(SAID)REFUA		1	
HONEY'S CLEANERS		1	
HOP-SING'S LAUNDRY, CRAIG WILLEMS		1	
HUNTINGTON HARBOUR CLEANERS		1	
HYTONE CLEANERS CORP		1	
I M PRESS, TAMER AZMY DBA		1	
IMAGE CLEANERS, HYUNSUK KIM DBA		1	
IMPERIAL CLEANERS, PAUL S PARK DBA		1	
ISABEL CLEANERS, JULIAN TORRES DBA		1	
ISLAND CLEANERS, SUSAN CHOI DBA		1	
ISLAND CLEANERS, UI SU CHOI DBA		1	
ITALIA CLEANERS INC/DRY CLEAN EXPRESS		1	
J & J CLEANERS		1	
J.C. LIBERTY CLEANERS		1	
JASMINE CLEANERS		1	
JERRY'S CLEANERS		2	
JIM DANDY CLEANERS		1	
JOSEPH'S CLEANERS		1	
JOY CLEANERS		2	
K&S CLEANERS, JYUNG JIN HAM, DBA		1	
KARINA'S CLASSIC CLEANERS		1	
KELLY'S CLEANERS		1	
KEY CLEANERS		1	
KING CLEANERS, JESUS AVILA, DBA		1	
KONA CLEANERS, BHAVIN PATEL DBA		1	
K'S CUSTOM CLEANERS		1	
L & J CLEANERS, ALFRED HOWELL DBA		1	
L & S CLEANERS		1	
LA CIENEGA 1 HOUR DRY CLEANERS, INC.		1	
LA DERA CLEANERS		1	

Retail/Service	812320		
LADERA CLEANERS		1	
LAS PALMAS CLEANERS, B H RAMA, DBA		1	
LAUREL QUALITY CLEANERS		1	
LAWDALE CITY CLEANERS		1	
LAWRENCE ARONSON ECO COASTAL CLEANERS		1	
LE GRAND'S CLEANERS		1	
LEE'S CLEANERS, KWANG HWAN LEE DBA		1	
LEWIS CLEANERS		1	
LEWIS CLEANERS, HORIN OZDEMIR, DBA		1	
LINCOLN CLEANERS		1	
LORD'S CLEANERS		1	
LOS ALTOS CLEANERS		1	
LOUIE'S CLEANERS & LAUNDRY, FEDERICO/HID		1	
LPJ CLEANERS, IUDI RUDI MASBRATA DBA		1	
LUCKY CLEANERS		1	
LUCKY CLEANERS, HONG SOO NO, DBA		1	
M & N MIRACLE CLEANERS		1	
MABURY CLEANERS		1	
MACLAY CLEANERS		1	
MAGIC CLEANERS, BILL HANNA DBA		1	
MAGNOLIA CLEANERS		1	
MARGARITA SQ. TOWN CLEANERS, Y. M. KIM		1	
MARINA CLEANERS		2	
MARINA DEL REY QUALITY CLEANERS		1	
MARKET PLACE CLEANERS		1	
MARLO CUSTOM DRY CLEAN		1	
MARSHALL'S CLEANERS, ROBERT WILMETH DBA		1	
MASTER TOUCH CLEANERS, CHERKEZIAN & CERK		1	
MAX'S CLEANERS		1	
MEADOWS CLEANERS		1	
MEMORY LANE CLEANERS		1	
MERRIT CLEANERS		1	
MERRILL CLEANERS		1	
METRO WASH & LAUNDRY		1	
MINA'S CLEANERS		1	
MINA'S CLEANERS, REFAT MIKHAEL, DBA		1	
MINT CLEANERS		1	
MIRACLE CLEANERS, PHILLIP S. YU DBA		1	
MITAGE CLEANER, M. EBRAHIMPOUR DBA		1	
MOM & SON CLEANERS		1	
MOUNTAIN SQUARE CLEANERS		1	
MOUNTAIN VIEW CLEANERS		1	
MR CLEAN CLEANERS & LAUNDRY		1	
MR DRYCLEAN		1	
MR. CLEANERS		1	
MXS DRY CLEANERS, KELLY LI DBA		1	
MY FAVORITE CLEANERS		1	
MY PERFECT DRY CLEANERS		1	
NABERS CLEANERS, JOHN M NABER DBA		1	
NATALINDA INC, THE CLEANING BARON DBA		1	
NATIONAL CLEANERS		1	
NATIONAL CLEANERS, RUBEN QUINONES, DBA		1	
NATL CLEANERS		1	
NATURE CLEANERS		1	
NEW ERA CLEANERS		1	
NEW IMAGE CLEANERS		1	
NEW MARINA CLEANERS		1	
NICE & NEAT CLEANERS		1	
NICE/ACE CLEANERS		1	
NICK'S VIP CLEANERS, KYUNG C. KIM, DBA		1	
NORGE VILLAGE CLEANERS, TAE H KWACK, DBA		1	
NORGETOWN CLEANERS		1	
NORMANDIE CLEANERS		1	
NU LIFE CLEANERS		1	
NU-WAY CLEANERS		2	
OAKDALE CLEANERS		1	
OC CLEANERS, TATYOS TED DEMIRCIAN		1	
OGDEN'S CLEANER, SANG HOON LEE, DBA		1	

Retail/Service	812320		
OGDEN'S CLEANERS		2	
OGDEN'S CLEANERS, BONGKOO KIM		1	
OLD ENGLISH CLEANERS & SERVICES		1	
OLGA DRY CLEANER SUPREME		1	
OLIVE CLEANERS		2	
ONE DOLLAR CLEANERS INC./1\$ DRY CLEANERS		1	
ONE HOUR FABRIC CARE		1	
ONE HOUR FABRIC CARE, MOON ZA OH DBA		1	
ONE STOP CLEANERS		1	
ORANGE CLEANERS, IN YONG NA		1	
ORANGE PLAZA CLEANER, S PATEL, DBA		1	
ORCHID CLEANERS, YONG KIM, DBA		1	
ORCHID CLEANERS, JONG CHUN LEE, DBA		1	
PACIFIC GLOBE INC. DAY CREEK SHELL DBA		1	
PACIFIC PLAZA CLEANERS, EUNICE KIM DBA		1	
PALM CLEANERS, HYUNG S. RYU, DBA		1	
PALM CLEANERS, KWANG HWAN LEE DBA		2	
PALM DESERT C & C CLEANERS INC		1	
PALM DESERT CLEANERS		1	
PALM SPRINGS CLEANERS INC		1	
PALMS CLEANERS, KWANG H. LEE DBA		1	
PANTORIUM CLEANERS INC		1	
PARADISE CLEANERS		1	
PARADISE CLEANERS, JAY SHAH DBA		1	
PARAGON CLEANERS, BOLEV INC DBA		1	
PATEL & CO. 1HR FABRICARE CLEANERS DBA		1	
PEGASUS CLEANERS, EMMA KAZARYAN		1	
PEPPERMINT CLEANERS, NGA THIEN VU		1	
PERFECT CLEANERS		1	
PERFECT CLEANERS II		1	
PICASSO CLEANERS		1	
PICO CLEANING CNTR, S & S & B DJAHANBANI		1	
PINK PANTHER CLEANERS		1	
PLATINUM CLEANERS		1	
PLAZA CLEANERS		1	
PLAZA CLEANERS #1		1	
PLAZA CLEANERS, JAE HONG KIM DBA		1	
PLAZA CLEANERS, JONG AE YU DBA		1	
PLAZA CLEANERS, JUNG S. CHON DBA		1	
PORTER RANCH CLEANERS		1	
PORTOLA 1 HR CLEANERS		1	
POWER PROFESSIONAL CLEANERS CORPORATION		1	
PRESSED 4 TIME		1	
PRESTO CLEANERS		1	
QUALITY CLEANERS, CARLOS DELATORRE		1	
QUALITY CLEANERS, SAAD Z. FARAG		1	
QUICK & CLEAN, MANINDER SINGH DBA		1	
R-A CLEANERS		1	
RAINBOW CLEANERS		1	
RANCH CLEANERS		1	
RANCHO CLEANERS		1	
RANCHO CLEANERS, RAVI PATEL DBA		1	
RAYMAR CLEANERS, LEE KWAN JIN. DBA		1	
REA CLEANERS INC		1	
REDLANDS CLEANERS		1	
RELAXX DRY CLEANING		1	
RELIABLE CLEANERS, RICARDO RIVAS DBA		1	
RESEDA ONE HOUR CLEANERS, JOON H LIM DBA		1	
REYES ADOBE CLEANING & TAILORING, J.CHOI		1	
RITZ CLEANERS, ARMADA PACIFIC CORP DBA		1	
RITZ CLEANERS, KAYMEE SIN DBA		1	
RIVERDALE CLEANERS, D SOMMAY DBA		1	
ROBERTSON CLEANERS, S DJAHANBANI ETAL		1	
ROCKET CLEANERS		1	
ROCKET CLEANERS & LAUNDRY		1	
ROLLING RIDGE CLEANERS, MALEK AYASS, DBA		1	
ROSALI ENT, INC., ROSALI CLEANERS DBA		1	
ROSE'S CLEANERS		1	

Retail/Service	812320	ROSITAS CLEANERS, ROSALINDA PALOMARES DB	1
		ROUND THE CLOCK CLEANERS	1
		ROYAL CLEANERS	1
		ROYAL CLEANERS, RAJINDER MANCHANDA DBA	1
		ROYAL DRY CLEANERS, SUNIL PATEL DBA	1
		RUTLEYS CLEANERS	1
		SAM'S QUALITY CLEANER, SURENDRA PATEL DB	1
		SANTIAGO HILLS CLEANERS	1
		SCOTTEE CLEANERS	1
		SEA BREEZE CLEANERS	1
		SHARP CUSTOM CLEANERS	1
		SHINE CLEANERS, URBAN CLEANERS DBA	1
		SIMONS SUN VALLEY CLEANERS	1
		SKY CANYON CLEANERS/CHONG I KIM	1
		SKYLARK CLEANERS	1
		SLOAN'S DRY CLEANERS	1
		SLOANS DRY CLEANERS & LNDY, I. TRONCOSO	1
		SNAPPY CLEANERS	1
		SO FRESH, SO CLEANERS	1
		SOFTONE CLEANERS, KYUNG JA IM DBA	1
		SPARKLING CLEANERS	1
		SPIC & SPAN CLEANERS	1
		SPIN CYCLE DRYCLEAN	1
		SPRING CLEANERS, ISSA GHARIBEH	1
		STAR CLEANERS	1
		STARBRITE CLEANERS, STARBRITE INC	1
		STONEVIEW CORP, CARRIAGE TRADE CLEANERS	1
		STUDIO 4 CLEANERS	1
		SUN VALLEY CLEANERS	1
		SUNNY CLEANERS	1
		SUNNY FRESH CLEANERS	1
		SUNNY FRESH CLEANERS # 4	1
		SUNRISE CLEANERS	1
		SUPER CLEAN DRY CLEANERS	1
		SWAN CLEANERS FALF LLC	1
		SYCAMORE 1 HR CLEANERS	1
		TAMMIE'S 1 HR CLEANERS	1
		TEJAL CLEANERS	1
		THE CLEANING SPOT	1
		THE CLEANING STORE, JONG OK KONG	1
		THE CORNER CLEANERS	2
		THIRD STREET CLEANERS	1
		TINKER BELL CLEANERS	1
		TOKYO CLEANERS	1
		TORO CLEANERS	1
		TORRANCE PLAZA CLEANERS, A. GRIJALVA DBA	1
		TORRANCE TOWNE CLEANERS	1
		TOWN CENTER CLEANERS, SUK JOONG KIM DBA	1
		TOWN SQUARE CLEANERS & LAUNDRY	1
		TOWNE CLEANERS	1
		TRANCAS CLEANERS, S SUNG, DBA	1
		TRIANGLE CLEANERS	1
		TRI-CITY CLEANERS	1
		TROJAN CLEANERS	1
		TUSTIN RANCH CLEANERS	1
		U S CLEANERS	2
		ULTRA CLEAN CLEANERS	1
		UNIQUE CLEANERS	1
		UNIQUE CLEANERS, BYUNG WOO MIN	1
		UNIVERSITY CLEANERS	1
		V & M CLEANERS	1
		VALET CLEANERS	1
		VALUCLEAN CLEANERS	1
		VALUE 1 HOUR CLEANERS, SANG H KIM	1
		VALUE CLEANERS	1
		VALUE VILLAGE CLEANERS, LAWRENCE PARK	1
		VIA VERDE CLEANERS, KI J & KAREN YANG	1
		VIEW CLEANERS	1

Retail/Service	812320	VILLA CLEANERS	1
		VILLA PARK CLEANERS, Y H CHO	1
		VILLAGE CLEANERS	1
		VILLAGE DRY CLEANERS	1
		VIP CLEANERS, SO JUNG DBA	1
		VIP CLEANERS, YOUNG CHO	1
		VIRGINIA CLEANERS, A JERONIMO	1
		VISTA CLEANERS	1
		WALTERIA CLEANERS, YOUNG NAM KIM DBA	1
		WALT'S CLEANERS, YOUNG SUN ROH	1
		WASHINGTON CLEANERS	1
		WASHINGTON CLEANERS, K S PARK DBA	1
		WAYMAN CLEANERS, HWA BOK LEE DBA	1
		WEAVERS CLEANERS, JOHNNY FOSTER	1
		WEST COVINA CLEANERS,RODON FABRICARE INC	1
		WEST OAKS CLEANERS & LAUNDRY	1
		WESTWOOD PETROLEUM INC	1
		WETHERLY CLEANERS	1
		WHEELER'S CLEANERS, D KESHMIR ETAL	1
		WHITE HOUSE CLEANERS	1
		WILLOW TREE CLEANERS, HYUK SUNG PARK DBA	1
		WILSHIRE HILL CLEANERS	1
		WINERY CLEANERS, SON YONG YODER DBA	1
		WINNETKA CLEANERS	1
		WON'S CLEANERS	1
		WOODRUFF CLEANERS, E J LEE DBA	1
		WOODSIDE VILLAGE CLEANERS	1
		WORLD CLASS CLEANERS, HAROUT SHAMAMIAN	1
		YOUNGS CLEANERS	1
		YOUR CLEANERS, MOHAMMAD SHAGHAGHI DBA	1
		YOUR CLEANERS,DBA TRAN THAN VAN	1
		ZEPPELIN CLEANERS, RICHARD NAM DBA	1
	812331	FOASBERG LAUNDRY & CLEANERS INC	1
		PRUDENTIAL OVERALL SUPPLY	1
	812332	ARAMARK UNIFORM SERVICES	1
		FRESHTEX	1
		GARMENT INDUSTRY LAUNDRY INC.	1
		PRUDENTIAL OVERALL SUPPLY CO	1
		STONE BLUE INC	1
	812921	STAN WINSTON INC	1
	812930	FAMILY ANIMAL SERVICES, MAURICE G LEON	1
		PICO VALET SRVCS/FLORA J CORPORATION DBA	1
		AP CAR & BODY SERVICES	1
		ARCO AM/PM; BEAR CREEK	1
	812990	ATLANTIC RICHFIELD CORP., ARCO 1958	1
		CAL PET CREMATORY	1
		CUSTOM FOOD PRODUCTS	1
		DESERT CREMATION SOCIETY, INC	1
		FAIRHAVEN MEM PARK	1
		FOREST LAWN MEM PARK ASSOC	2
		G & H ULTRAMAR, INC.	1
		GATEWAY PET CEMETERY	1
		HARBOR LAWN MEM PARK	1
		HCH SERVICE STATION, INC.	1
		HERITAGE CREMATORY	1
		INLAND MEMORIAL	1
		JPR TECHNICAL SERVICES INC	1
		MT. VIEW CEMETERY	1
		PACIFIC MARITIME SERVICES, LLC	1
		RICHARD EGZI II	1
		RON & JULIE ENT. INC, PET HAVEN CEMETERY	1
		STADIUM GATEWAY, LLC	1
		STRICKLIN-SNIVELY MORTUARY	1
		SUPERHEAT FGH SERVICES, INC	1
		VISHAY TRANSDUCERS, LTD	1
		WEAVER MORTUARY, INC	1
		WHITE DOVE PET CREMATION SERVICES, INC.	1
		WHITE- EMERSON CO	1

Retail/Service		Personal and Laundry Services Total	686
Postal Service			
491110	UNIVERSAL CITY STUDIOS,LLC		1
Postal Service Total			1
Repair and Maintenance			
811000	213 COLLISION REPAIR CENTER, INC		1
	3 B'S INC, STAR BODY & PAINT DBA		1
	3M AUTO CENTER INC.		1
	A & H AUTOBODY		1
	A & J BODY SHOP		1
	A A AUTOWORKS		1
	A AND B AUTO REPAIR AND PAINT		1
	A2 COLLISION CENTER		1
	AA AUTOWORKS		1
	ALCHEMY AUTO PAINTING & COLLISION REPAIR		1
	ALL AROUND AUTO BODY		2
	ALL STATE AUTO BODY LLC		1
	ARANZA'S AUTO BODY & PAINT		1
	AUTO BODY CONCEPTS		1
	AUTO EXTRA'S		1
	AZTECA TIRES & AUTO REPAIR/BODY SHOP		1
	B & M OIL SERVICES INC		1
	BARAC'S AUTO BODY SHOP, JOSE LUIS FLORES		1
	BELL'S BUMPER REPAIR, MARC DANIEL BELL		1
	BEST AUTOBODY & PAINT		1
	BUSTILLOS COLLISION AUTO REPAIR		1
	CALIBER BODY WORKS INC,CALIBER COLLISION		1
	CALIBER COLLISION CENTERS		1
	CALIFORNIA COLLISION CENTER		1
	CALIFORNIA CUSTOMS & CLASSICS		1
	CANELA COLLISION CENTER INC		1
	CAPITAL AUTO REPAIR AND BODY		1
	CARL'S REFINISHING, CARLOS GOMES, DBA		1
	CESAR'S AUTO BODY		1
	CHAMPION COLLISION CENTER LLC		1
	CITY WIDE AUTO BODY		1
	CLASSIC COLLISION CTR OF TUJUNGA, INC		1
	CM HOLDINGS INC,BODY & PAINT INNOVATIONS		1
	COLLISION 1		1
	CROOK BROTHERS BODY SHOP		1
	CUCO'S AUTOBODY		1
	DAN LEMAY WEST COAST COLLISION CENTER		1
	DEEP BLUE COLLISION CENTER INC.		1
	DELTA AUTO SERVICE CENTER		1
	DIEGO'S AUTO BODY		1
	DRASCO BODY & FENDER WORKS		1
	EASY BODY SHOP, CARLOS MONTES		1
	ENTERPRISE AUTOBODY, NORMA SIMS		1
	EUROTECH REFINISHING AND COLLISION, INC.		1
	EV GENERAL AUTO, EDMUND ESKANDARI		1
	F & G BODY SHOP FRAME, GODO VASQUEZ DBA		1
	G & H COLLISION CENTER, INC		1
	GENERAL AUTO BODY		1
	GILBERTS AUTO BODY		1
	GLO BODY SHOP & PAINT, J. MARTINEZ DBA		1
	H & A TUJUNGA AUTOMOTIVE CENTER		1
	H D AUTO BODY		1
	HAIZAR AUTO TRADE, HAIZAR ASSI DBA		1
	HANKEY INVSTMNT CO/MIDWAY COLLISION CTR		1
	HARRY'S COLLISION CENTER		1
	HOT RODS AND HOBBIES, SCOTT BONOWSKI DBA		1
	INGLEWOOD AUTO BODY		1
	INLAND EMPIRE AUTO BODY & PAINT INC		1
	J & P TRUCK BODY SHOP		1
	JJ COLLISION CENTER		1
	JOE'S BODY SHOP		1

Retail/Service	811000		
		JPJ BODY COLLISION, INC.	1
		K & W AUTO BODY	1
		KINGZ AUTO BODY	1
		K'S AUTO, AZAT KURAJIAN DBA	1
		L A CAR GUY AUTOBODY	1
		LANKERSHIM COLLISION & AUTO REPAIR	1
		LEGACY AUTO BODY	1
		LIDIMAR CORP. DBA AUTO FITNESS CORP.	1
		LONG BEACH COLLISION CENTER CORP.	1
		LYNWOOD AUTO CRAFT	1
		MAC II AUTO BODY SHOP, INC.	1
		MASTER COLLISION REPAIR, INC.	1
		MASTERPIECE BODY WORKS LLC	1
		MC LAREN AUTO BODY	1
		MODENA AUTO WORKS, INC.	1
		MONTEBELLO COLLISION CENTER	1
		MONTES BODY, MARUYN MONTES DBA	1
		MORAN'S COLLISION CENTER	1
		MZ BODY SHOP	1
		NICK AUTO BODY & PAINT	1
		OFFICE SYSTEMS SPECIALISTS	1
		OLIVE AMERICAN GAS	1
		P & C AUTO BODY AND AUTO SERVICE	1
		PACIFIC COMMERCIAL TRUCK BODY	1
		PAULEE BODY SHOP	1
		PENA Y CORTEZ BODY SHOP, C.J. RUIZ DBA	1
		PERFORMANCE AUTO BODY & PAINT	1
		PINKY'S AUTOMOTIVE II LLC	1
		PRECISE COLLISION CENTER	1
		PRECISION AUTO CENTER	1
		PREMIER MOTORSPORT, INC.	1
		PRISTINE AUTO/ARAM MANOYAN	1
		PROMAX GAS, ASHRAF ENYAD DBA	1
		PRO-MOTOR COLLISION REPAIR INC	1
		QUICK AUTO BODY	1
		RAMOS BODY SHOP	1
		RC EMPIRE BODY SHOP & PAINT REPAIR	1
		RED STAR AUTO BODY	1
		RESEDA INTERNATIONAL COLLISION CENTER	1
		ROAD DOG CUSTOMS INC	1
		ROBERT BASHARA AUTO, R. BASHARA, DBA	1
		SERAFIN COLLISION REPAIR	1
		SERGIO'S AUTO COLLISION, INC	1
		SIERRA AUTO BODY	1
		SOUTHERN BAJA, INC	1
		STATE ST AUTO BODY	1
		STERLING AUTO BODY CENTERS	1
		SUPERIOR COLLISION CNTR, DONALD SPRAGGS	1
		TENORIOS AUTO BODY & PAINT	1
		THE BUMPER CLINIC	1
		TOMM'S AUTO BODY	1
		TWINNS AUTO BODY	1
		UNIQUE AUTO BODY & PAINT	1
		URUAPAN BODY SHOP, JAVIER ALCALA DBA	1
		V & S AUTO BODY AND PAINT	1
		VAHE AUTO BODY	1
		VALLEY WIDE COLLISION	1
		VL AUTO CRAFT BODY & PAINT	1
		WATERCAR, INC.	1
		WEST AUTO BODY & REPAIR	1
		XCLUSIVE AUTO BODY	1
	811100	A & F FORKLIFT, INC.	1
	811110	AUTO RECON INC.	1
		AUTOZONE SUPPORT CENTER	1
		AXIS AUTOMOTIVE INC., DBA	1
		CARMAX THE AUTO SUPERSTORES CA, LLC	1
		GRAND AVE. SERVICE STATION	1
		HILLSIDE AUTO SALVAGE & PICK-A-PART/RIV	1

Retail/Service	811110	MENIFEE CAR WASH, LP	1
		MIDNIGHT AUTO RECYCLERS &	1
		NAPOLEON'S AUTO BODY	1
		NAT AUTO CENTER	1
		NATIONAL CARD, LABEL & AFFIXING, INC.	1
		RIALTO USD, WILMER AMINA CARTER HS	1
		ROYALTY CARPET MILLS	1
		U.S. GAS & SMOG PROFESSIONAL, GHAJAR INC	1
		WOODY'S AUTO WORKS	1
	811111	101 STUDIO AUTO COLLISION INC	1
		7 ELEVEN, INC./#33578	1
		A - Z TECH AUTOMOTIVE, DOUG LONG	1
		A & B AUTO COLLISION	1
		A.TO Z. AUTO REPAIR	1
		A-CAR AUTO COLLISION CENTER	1
		ACCURATE COLLISION CENTER	1
		AD AUTO BODY	1
		ALICIA AUTO SERVICE INC	1
		ANGEL'S MOBILE PAINT & BODY SHOP	1
		ART'S AUTO CARE	1
		AUTO PERFECTIONS	1
		AUTOCARE EXPERTS	1
		AUTOSQUARE COLLISION CENTER	1
		AVIO COACH CRAFT	1
		BANGKOK AUTO BODY	1
		BOB'S AUTO BODY INC	1
		BODY FRAME AND WHEEL ALIGNMENT SVC	1
		BOULEVARD AUTO REPAIR, INC.	1
		BURBANK CITY, CITY HALL	1
		CALIBER BODYWORKS, CALIBER COLLISION CTR	1
		CALIFORNIA COACH AUTO BODY	1
		CARMONA'S COLLISION REPAIR	1
		CASA AUTOMOTIVE GROUP BODY SHOP, MCGOLDR	1
		CBS AUTOBODY SHOP INC	1
		CHATSWORTH AUTO REPAIR	1
		CITY BODY & FRAME	1
		CITY BODY AND FRAME	1
		COLLISION MASTER, CRAM'S AUTO PAINT DBA	1
		CONOCOPHILLIPS 2705948/IRVINE FUEL	1
		CONOCOPHILLIPS CO #2705623,ROBERT E LEE	1
		CONOCOPHILLIPS CO, J A HATTONI #254970	1
		COOL DADDY'S	1
		D' AUTOMAN	1
		DIEP CORP, T&T AUTO & BODY SERVICE DBA	1
		DIGO'S HOLLYWOOD AUTO CENTER	1
		DIVERSIFIED SPECIALTIES	1
		EMPIRE TRUCK & EQUIPMENT REPAIR	1
		EQUILON DLR, RIVERSIDE SHELL, S AGGARWAL	1
		EXXONMOBIL DLR, G. BAHRI #11317	1
		EXXONMOBIL OIL CORP, #18-170 / 10568	1
		EXXONMOBIL OIL DLR #11159/RADC ENT INC	1
		EXXONMOBIL,,TORRANCE SERV STA 11322	1
		EXXONMOBIL,G HANA, 17856, #18-MXY	1
		FAST AUTO COLLISION CENTER	1
		FINE CARS BODY SHOP	1
		FIX AUTO CENTER	1
		FLEET FUELING, TED SHACHORY DBA	1
		G & D AUTO COLLISION INC	1
		GALAXY AUTO BODY&PAINT,AVETIS AKSKALYAN	1
		GOLDEN BROTHERS AUTO BODY,ANGEL TREJO DB	1
		GORDO'S AUTO BODY, GABRIEL MACEDO DBA	1
		HANSEN AUTO BODY & PAINT/CYPRESS AUTO	1
		HARRY'S AUTOMOTIVE & BODY REPAIR	1
		HIGH ROLLERS BODY & PAINT	1
		HONDA R & D NORTH AMERICAS INC	1
		I-10 COLLISION CENTER	1
		INT'L AUTO SPECIALISTS BERGER/PORRASSETAL	1
		J & J BODY SHOP	1

Retail/Service	811111	J & R FLEET SERVICES, LLC	1
		J.S. AUTO TECH.	1
		JOHNNY'S STOUT BODY SHOP, J. DELA TORRE	1
		JOHN'S AUTO CENTER	1
		JOSE AUTO BODY SHOP	1
		KIMSE'S AUTO	1
		L & J REPAIR AUTO BODY	1
		L & S AUTO COLLISION / A-1 AUTO BODY	1
		LA CITY, DEPT OF GEN SERVICES	1
		LA CITY, LAPD MOTOR TRANSPORT DIV	1
		LA UNI SCH DIST, BSC BUS GARAGE	1
		LEE'S AUTO BODY	1
		LEE'S SUNRISE CO, J & J AUTO CTR, DBA	1
		LUPIAN AUTO REPAIR, ABEL LUPIAN, DBA	1
		MAG INSTRUMENT, INC	1
		MAGNETIC COMPONENT ENGINEERING	1
		MARCO'S AUTO BODY OF NORTH HOLLYWOOD	1
		MARINA AUTO BODY /WILLIAMSON ENT, INC.	1
		MC KINELY AUTO SERVICE	1
		MCBRIDE SERVICE & SUPPLY	1
		MIKE'S AUTO SERVICE, MICHEL WEHBE, DBA	1
		MILLENNIA ENT INC, FMC AUTOMOTIVE DBA	1
		MINIKA ENTERPRISE INC.SIDLE'S AUTOMOTIVE	1
		MIRACLE AUTOBODY	1
		MISSION AUTO EXPRESS	1
		MJ AUTO	1
		MOL AUTO BODY COLLISION	1
		MONTCLAIR AUTO BODY	1
		MOTORCARS DIRECT	1
		NETSTAR RAC CORP, JOHN HENNESAY	1
		NETWORK AUTO BODY INC	1
		NEW CENTRAL AUTO CENTER	1
		NEW PERFORMANCE 2000 AUTO, INC.	1
		NEW TECH AUTO	1
		NUMBER ONE AUTO BODY INC	1
		NUNEZ AUTO REPAIR	1
		NU-WORLD AUTO COLLISION	1
		PEREIRA'S AUTO REPAIR & BODY SHOP	1
		PRESTIGE AUTO CENTER	1
		PRIME AUTO BODY SPECIALIST	1
		PRO-TECH COLLISION AUTOMOTIVE CENTER INC	1
		QT AUTO COLLISION CTR, QUAN TRAN DBA	1
		QUALITY PAINT & BODY CENTER	1
		QUINO'S BODY SHOP	1
		R DREAM BODY SHOP, MOUCHEG YEGHIKIAN DBA	1
		RETRO AUTO WORKS, INC.	1
		ROLLIN AUTO & COLLISION CENTER	1
		S & G AUTO BODY	1
		SHINE AUTO PROJECT, INC	1
		SILVER MOTORS, INC/MANUEL CRUZ	1
		SOUTH BAY COLLISION & AUTO REPAIR,E BAK	1
		SUN MOTORS	1
		TARGET AUTO BODY REPAIR INC	1
		TASHKEN AUTO SERVICE INC	1
		TEAM THOMPSON INC	1
		TECHNICAL ELEMENT AUTO INC	1
		THE PROFESSIONALS BODY SHOP, B GALINDO	1
		TOPANGA AUTO CENTER	1
		TUTTOBENE AUTO REPAIR & BODY SHOP	1
		UNIQUE AUTOBODY & PAINT	1
		VALLES AUTO PAINTING & BODY REP,R. VALLE	1
		VICTOR'S PAINT & BODY	1
		VIP CUSTOMZ	1
		WESTERN AVENUE AUTO BODY	1
		WESTWOOD AUTO	1
		YORK AUTO BODY	1
		YOSSI EXPRESS AUTO BODY	1
		ARCO FAC #06171,EXPRESS SMOGCHK & REPAI	1
	811112		

Retail/Service	811112	SHELL OPUS,S. KIM, JAMBOREE SHELL#120718	1
	811113	PICO AUTO, INC.	1
	811118	ALL STAR COLLISION, INC., DEAN SEIF	1
		AL-SAL OIL CO., INC. #26	1
		AM AUTO CENTER, ANDREW KIM DBA	1
		AUTO BODY SPECIALIST INC	1
		B AND H AUTO REPAIR INC	1
		BALBOA CAR CARE CENTER	1
		BANNING, CITY OF	1
		CA COLLECTABLE COACHWORKS	1
		CALIFORNIA COLLISION BODY SHOP INC.	1
		CEDAR GLEN GAS STOP&CEDAR GLEN AUTO CARE	1
		COLLISION CENTER OF TEMECULA	1
		CONTRERAS AUTO MECHANIC SHOP	1
		CRAFTSMEN AUTO BODY SHOP	1
		G.C.C. FINE CABINETRY & GRANITE INC.	1
		LA CAR REPAIR SPECIALISTS, INC	1
		LIBERTY COLLISION CENTER	1
		LONG BEACH AUTO REPAIR CTR, MARILYN TIM	1
		MM WEST COVINA LLC	1
		RAMONA AUTO BODY & REPAIR	1
		RIVERA'S AUTO COLLISION	1
		RONALD'S AUTO BODY SHOP	1
		SPECIAL EFFECTS, INC. AUTO BODY	1
		THROGMORTONS FRAME CLINIC INC	1
		TOWN AUTO CENTER	1
		VICTOR'S SERVICE CENTER GARAGE	1
		VIP AUTO BODY	1
	811121	101 COLLISION	1
		2 WHEEL CYCLE REPAIR	1
		64 LOW INC, GREG VASQUEZ, DBA	1
		866 I WAS HIT INC	1
		88 AUTO BODY COLLISION REPAIR INC	1
		A & A AUTOBODY & PAINT	1
		A & A FLEET REPAINTING, INC.	1
		A & M QUALITY BODY SHOP,	1
		A & S AUTO SERVICE CENTER	1
		A 1 QUALITY AUTO	1
		A AND J AUTO BODY	1
		A PLUS AUTOCENTER INC	1
		A&E COLLISION CENTER, LLC	1
		A&J AUTO BODY	1
		A. T. V. COATINGS	1
		A+ AUTO CENTER	1
		A2ZFX INC.	1
		AA DELANO AUTO BODY SHOP	1
		ABC AUTO BODY & PAINT	1
		ABM ENTERPRISES, INC.	1
		ABSOLUT AUTO PLACE, SARUYUN CHERKESYAN	1
		ACAPULCO AUTO BODY	1
		ACE QUALITY COLLISION CENTER	1
		ACR AUTO BODY	1
		ADAMS COLLISION CENTER	1
		ADVANCE AUTO BODY	1
		ADVANCED COLLISION TECHNOLOGIES	1
		AERO-CLASSICS INC	1
		AIRHEAD KUSTOMS	1
		AK 1 MOTOR SPORTS	1
		AK1 MOTOR SPORTS	1
		ALGER AUTO BODY & PAINT	1
		ALHAMBRA AUTO KRAFT, INC.	1
		ALL CITY AUTO BODY, SARKIS FURNCHYAN	1
		ALL MAGIC PAINT & BODY, INC.	1
		ALL STAR AUTO BODY	1
		ALPHA'S 1 AUTO SALES	1
		ALPINE BODY SHOP	1
		AL'S BODY SHOP OF MAYWOOD	1
		ALVIN'S AUTO BODY & PAINT	1

Retail/Service	811121	AMERICA AUTO BODY	1
		AMERICAN COLLISION CENTER	1
		ANAHEIM HILLS AUTO BODY	1
		ANAHEIM PRESTIGE AUTO BODY INC	1
		ANA'S AUTO BODY SHOP	1
		ARCHITECTURAL FINISHING, LLC	1
		ARNOLD BODY SHOP	1
		ARROW GLEN BODY SHOP INC	1
		ATLANTIC COLLISION CENTER	1
		AUTLAN COLLISION CENTER	1
		AUTO CENTER BODY WORK & PAINT, INC.,	1
		AUTO COLORS PAINT & BODY	1
		AUTO CRAFT AUTOBODY, INC. A. ALVAREZ	1
		AUTO CTR AUTO BODY	1
		AUTO EVOLUTION, ESTHER RAMIREZ DBA	1
		AUTO EXPLOSION/ESTEBAN PIMENTEL	1
		AUTO TECH BODY & REPAIR, INC.	1
		AUTO TECH LEWIS	1
		AUTOMOTIVE BODY PAINT	1
		AUTOMOTIVE COLLISION REFINISH SPECIALIST	1
		AUTOPRACTOR AUTO BODY	1
		AVALON COLLISION CENTER	1
		B&E CUSTOM	1
		BADDONS CUSTOM MOTORCYCLE,RICHARD BADDON	1
		BAIR'S KEYSTONE BODY SHOP, INC.	1
		BANDA'S AUTO BODY, ADAM BANDA DBA	1
		BELAGIO QUALITY AUTOBODY & REPAIR INC	1
		BEN CLYMER'S "THE BODY SHOP"	1
		BEN CLYMER'S-THE BODY SHOP, B CLYMER DBA	1
		BENS AUTO COLLISION	1
		BEST BUY IMPORTS	1
		BEST CHOICE AUTO BODY REPAIR,JIN A JEONG	1
		BEST-4-LESS AUTO BODY,CARLOS BRISENO DB	1
		BETO'S AUTO BODY INC	1
		BEVERLY HILLS AUTO BODY GROUP	1
		BEYOND AUTO BODY	1
		BIG DOG PRODS INC	1
		BIG J'S AUTOBODY, JOSE CASAREZ DBA	1
		BOB'S BODY & FENDER REPAIR	1
		BOLEAB INC/CERTIFIED COLLISION CRAFT DBA	1
		BOND GLASS & BODYSHOP	1
		BRENTWOOD CHEVIOT AUTO BODY SHOP	1
		BROOKS ORANGE BODY & PAINT	1
		C & C COLLISION CENTER, INC	1
		C & D AUTO BODY, CARLOS MARTINEZ DBA	1
		C & M AUTOBODY	1
		C & R CLASSIC AUTO BODY	1
		C & R ONE STOP AUTO BODY & PAINT	1
		CAL SMITH MAACO CORPORATION	1
		CALIBER AUTO INC	1
		CALIBER BODYWORKS INC,CALIBER COLLISION	1
		CALIBER BODYWORKS, INC.	1
		CALIBER BODYWORKS, INC.,CALIBER COLL CTR	1
		CALIBER COLLISION CENTER	1
		CALIF AUTO COLLISION CORP	1
		CALIFORNIA CONCEPTS CUSTOM USA	1
		CAMINO REAL COLLISION CENTER INC	1
		CANALES AUTO BODY & PAINT	1
		CANOGA AUTO BODY	1
		CANYON PAINT AND BODY, INC	1
		CAR TOPICS AUTO BODY	1
		CARS - CORONA COLLISION REPAIR INC	1
		CARSMETICS	1
		CARSON COLLISION CARE CENTER	1
		CEDAR GLEN AUTO BODY & TIRE, WEATHERWAX	1
		CENTRE POINTE COLLISION CENTER	1
		CENTURY 1ST AUTO BODY	1
		CENTURY COLLISION CENTER	1

Retail/Service	811121		1
CENTURY ENTER. INC, BEVERLY HILLS BODY			1
CHAFFEY AUTO BODY, INC.			1
CHAMPION COLLISION CENTER			1
CHANG'S AUTO BODY & PAINTING, H.S. CHANG			1
CHATSWORTH COLLISION			1
CHAVEZ AUTO BODY			1
CHERRY AUTO BODY			1
CHICO CARVINGS			1
CIVIC AUTO BODY INC			1
CL FINANCIAL DBA COASTAL COACHWORKS			1
CLASSIC AUTO BODY			1
CLASSIC TOYS			1
CLASSIC TRADITIONS			1
COACHELLA VALLEY COLLISION CENTER			1
COACHELLA VALLEY COLLISION CENTER EAST			1
COLLISION CENTER OF MORENO VALLEY			1
COLONY AUTO BODY, JORGE LUQUIN DBA			1
COLOR BY WOZ			1
COLOR TECH COMMERCIAL PRINTING			1
COMMUNITY AUTO BODY			1
COMPRESSOR PARTS & REPAIR INC			1
CORONA AUTO WORKS II			1
CRENSHAW AUTO COLLISION			1
CROWN AUTO REPAIRS LLC			1
CROWN COACHWORKS AUTO BODY, J DUNKEL,DBA			1
CUSTOM AUTO CRAFT			1
CUSTOM WORLD AUTO BODY			1
D & D BODY & PAINT			1
DAVID ELLIS CHRYSLER, INC.			1
DB COLLISION CENTER			1
DEE'S AUTO BODY & PAINT			1
DELUXE AUTO BODY			1
DESHLERS QUALITY COLLISION REPAIR			1
DIAMOND AUTO BODY			1
DIAMOND AUTO BODY, INC.			1
DIAMOND AUTOMOTIVE CENTER			1
DIAMOND BODY SHOP, KENNY NOU DBA			1
DIAMOND TOUCH BODY SHOP			1
DILLANO AUTO BODY			1
DISCOUNT AUTO BODY			1
DISTRICT AUTO BODY			1
DON STEVE'S COLLISION			1
DON'S BODY SHOP			1
DOUGLAS AUTO BODY & PAINT, INC.			1
DREAMWORK CUSTOMS & COLLISIONS, INC			1
D'S PAINT AND BODY INC			1
DURAN'S QUALITY PAINTING			1
EAGLE AUTO BODY			1
EAGLE BODY SHOP			1
EAJ CUSTOM CABINETS			1
EARL SCHEIB OF CALIFORNIA INC			1
ECKLES AUTO BODY INC			1
EDWIN'S BODY SHOP			1
EIGHTBALL RODS AND CHOPPERS			1
EL RINCON AUTO & BODY SHOP			1
ELEGANT BODY SHOP			1
ENGLISH & REEVES CUSTOM CABINETS INC.			1
EPIC WOODWORKS			1
ERNESTO'S BODY SHOP			1
ESPINOZA'S BODY SHOP			1
ESTRADA'S BODY & PAINT SHOP			1
EURO AMERICAN COLLISION CTR			1
EUROPEAN AUTO BODY, LEVON GYULTRASHYAN			1
EUROTECH REFINISHING & COLLISION, INC.			1
EXCLUSIVE AUTO BODY CENTER			1
EXPERT COLLISION, INC			1
EXPO COLLISION CENTER INC.			1
EXTREME QUALITY COLLISION CTR,J YOUNG DB			1

Retail/Service	811121		1
F & A AUTOBODY			1
FACTORY COLLISION			1
FERNANDO'S BODY SHOP, FERNANDO GONZALEZ			1
FINE CAR EXTERIORS, CARLOS MARIN DBA			1
FIX AUTO IRVINE, 0081 LLC, DBA			1
FIX AUTO ONTARIO NORTH			1
FIX-RIGHT PAINT & BODY			1
FLAVIO AUTO BODY & PAINT			1
FORD AUTO BODY			1
FRANKS AUTO BODY, INC.			1
FRONTLINE RECON SERVICES, INC			1
FUSION COLLISION CENTER, INC			1
FUTURE CAR CO			1
G & J AUTO BODY, JOSE VALENCIA DBA			1
G & S AUTO			1
G AND G AUTO BODY SHOP			1
G. ZEAK MCPEAK INC			1
GANZO'S COLLISION, GONZALO MANZO DBA			1
GEEZ AUTO COLLISION, JOSE ADRIAN AZAMAR			1
GERMAN AUTO, LOTHAR SPRANGER DBA			1
GIL'S BODY SHOP, GIL PEREZ DBA			1
GLENDALE AUTO BODY, INC			1
GO ORIGINAL COLLISION CTR,SARA COHAN DBA			1
GOLDEN AUTO BODY & PAINT			1
GOLDEN HANDS AUTO BODY INC			1
GONZALEZ'S BODY WORKS & PAINT,J GONZALEZ			1
GORDON'S PIER COLLISION			1
GRADY GARRISON'S PAINT AND AUTO BODY			1
GRAND PRIX AUTO BODY			1
GREEN LITE AUTO			1
GREG'S AUTO BODY			1
GREG'S WHITTIER AUTO BODY, G GUNTER DBA			1
GSP COLLISION INC,PATTERSON'S COLLISION			1
GUASAVE AUTO BODY & REPAIR			1
H & H AUTO BODY SHOP INC			1
HARRY'S AUTO BODY			1
HERIBERTOS KITCHEN CABINETS,MOISES PARRA			1
HERITAGE COLLISION CENTER INC			1
HI QUALITY AUTO CENTER			1
HIGH PERFORMANCE AUTO BODY			1
HIGH TECH AUTO BODY			1
HJS GRAPHICS DBA THE PRINTING CONNECTION			1
HOUSE OF CLASSICS AUTO BODY & PAINT			1
HOWARD BROWN & SONS AUTO BODY			1
HUGO'S AUTOBODY			1
HURLEY AUTO BODY			1
HVAC COATING, INC.			1
I & R AUTO BODY & PAINT,IGNACIO GONZALEZ			1
ICC COLLISION CENTERS			1
IMPERIAL BODY SHOP			1
INDIO AUTO BODY & PAINT,C&I VALLES JR DB			1
INDUSTRY AUTO BODY			1
INGLEWOOD AUTO BODY			1
INLAND BODY & PAINT CTR,FRANK MONTES DBA			1
INLAND EMPIRE COLLISION			1
INNOVATIVE MOBILE AUTO BODY			1
INTERNATIONAL AUTO BODY			1
INTERSTATE COLLISION CENTER INC			1
INTREPID COLLISION INC			1
IRVINE AUTO COLLISION			1
J & A AUTO BODY & PAINT INC.			1
J & L BODY AND PAINT SHOP INC			1
J AUTO BODY			1
J M BODY SHOP, JAVIER MARIN DBA			1
J P AUTO BODY & PAINT			1
J V COLLISION CENTER			1
JAMES ALLEN COLLISION CENTER			1
JAPAN AUTO BODY			1

Retail/Service	811121		
JDR, INC.		1	1
JIQUILPAN COLLISION CENTER		1	1
JMET ENTERPRISES, INC. DBA RACEONUSA		1	1
JOE'S AUTO BODY		1	1
JOE'S CLASSIC COACHWORKS		1	1
J'S BODY SHOP		1	1
JT MECHANIC & BODY SHOP, INC.		1	1
JWW TRUST		1	1
K & B AUTO BODY		1	1
K B P INTERNATIONAL INC		1	1
KELLY'S BODY SHOP, INC.		1	1
KELLY'S CUSTOM PAINT & BODY		1	1
L & J AUTO BODY		1	1
L & M AUTO BODY INC		1	1
L A AUTO BODY, ARTEK AUTOWORKS INC		1	1
L A X WHEEL REFINISHING INC		1	1
L AUTO BODY, GARRY BALIKJI		1	1
LA PUERTA AUTO BODY, HUGO ORELLANA DBA		1	1
LAKE AVENUE AUTO BODY		1	1
LANCE'S COLLISION INC		1	1
LAND ROVER'S LAND		1	1
LANSE HASELRIG FINE AUTO RESTORATION INC		1	1
LARA'S AUTO BODY & PAINT, J PASTOR LARA		1	1
LASERA TECHNOLOGIES		1	1
LEGACY AUTO BODY SHOP # 2		1	1
LINE X SANTA FE SPRINGS		1	1
LINE-X OF NORTH HOLLYWOOD		1	1
LINE-X OF SANTA CLARITA		1	1
M & J AUTO BODY SRV		1	1
M.L. COLLISION		1	1
MAGNOLIA STREET AUTO BODY		1	1
MAKEOVER AUTOBODY & FRAME, INC.		1	1
MANHEIM SOUTHERN CALIFORNIA		1	1
MANUEL'S BODY SHOP		1	1
MAPLEWORKS REMODELING		1	1
MARCO'S AUTO BODY INC		1	1
MASTER AUTO BODY, ALBERT CHANG DBA		1	1
MASTER CRAFT PAINT&BODY,MARGARITA RAMOS		1	1
MAURICIO'S BODY SHOP.MAURICIO RIVERA DBA		1	1
MCALISTER BODY SHOP		1	1
MEDINA'S AUTO BODY SHOP		1	1
MEL'S AUTO BODY, MELVIN SHIOTA DBA		1	1
MERIT COLLISION REPAIR, INC.		1	1
METAL TATTOO, INC.		1	1
METCRAFT ENTERPRISES, INC.		2	1
MICHAEL CHAN AUTO BODY		1	1
MICHAEL'S AUTO BODY & PAINT		1	1
MINI COACH, INC.		1	1
MOBILE PREP STATION, PRO DENT AWAY, INC.		1	1
MOISES AUTO BODY & PAINT		1	1
MURRIETTA AUTO COLLISION		1	1
MVAC INC, MISSION VIEJO AUTO COLLISION		1	1
NASCAR COLLISION CENTER		1	1
NETWORK AUTO BODY INC		1	1
NETWORK AUTO BODY, INC		1	1
NEW IMAGE AUTO BODY		1	1
NEW IMAGE AUTOBODY & PAINT INC		1	1
NEW IMAGE SIGN & SERVICE		1	1
NEW YOUNG'S AUTO BODY & PAINT		1	1
NGUOI VIET AUTO BODY CENTER		1	1
NICK'S AUTO BODY		1	1
NICK'S OLD CAR SPECIALTY		1	1
NORM'S AUTO COLLISION CTR,S MANOUKIAN DB		1	1
NORTH HOLLYWOOD AUTO BODY & PAINTING		1	1
NORTH VALLEY AUTO BODY		1	1
NORTHWEST PAINT & BODY		1	1
OCEAN DRIVE COLLISION & PAINT		1	1
OHIO AUTO BODY		1	1

Retail/Service	811121		
OPTIMUM MOTORS, INC		1	1
OPTION COLLISION CENTER INC		1	1
ORANGE COUNTY BODY WORKS		1	1
ORIGINAL AUTO CENTER		1	1
OZ-KAR COLLISION CENTER		1	1
P & B COLLISION MGMT LLC/SUNRISE CTR		1	1
PACIFIC AERODYNAMIC INC		1	1
PACIFIC AUTO BODY		1	1
PACIFIC COLLISION CENTERS		1	1
PACIFIC COLLISION SPECLST, R MORONEY DBA		1	1
PACIFIC TRAILS COLLISION, INC.		1	1
PACOIMA AUTO BODY & PAINT		1	1
PAINT AND DETAIL EXPRESS		1	1
PAINT BY BRIGGS		1	1
PARADISE BODY & PAINT		1	1
PEOPLE'S CHOICE AUTO BODY AND PAINT		1	1
PEPE'S GARAGE		1	1
PERFECT AUTO BODY		1	1
PERFECT FINISH BODY SHOP		1	1
PERFORMANCE PAINT AND BODY, INC.		1	1
PERRIS ELITE COLLISION CENTER		1	1
PHU'S AUTO BODY & REPAIRING		1	1
PICASSO BODY SHOP, ELENA MARKUW DBA		1	1
PICTURE CAR WAREHOUSE INC		1	1
PIPO'S AUTO CENTER		1	1
PJ BONIFACIO MOTORCARS AUTODESIGN		1	1
POLANCO TRUCKING & COLLISION CENTER		1	1
POLMAN AUTO BODY		1	1
POMONA AUTO BODY COLLISION CENTER		1	1
POWDER COATING SERVICES		1	1
POWER AUTO BODY & PAINT		1	1
PRECISE COLLISION CENTER		1	1
PREMIER AUTO BODY		1	1
PREMIER AUTO COLLISION, QUAN NGUYEN, DBA		1	1
PRESTIGE TOO AUTO BODY INC		1	1
PRICE AUTOMOBILIA GROUP LLC		1	1
PRIDE COLLISION CTRS INC/FORD AUTO BODY		1	1
PRO AUTO BODY		1	1
PRO ONE AUTO BODY SHOP, INC.		1	1
QUALITY TOUCH UP		1	1
R & A AUTO BODY & PAINT		1	1
RAH INDUSTRIES		1	1
RALFI'S COLLISION CENTER		1	1
RALPH'S AUTO PAINTING		1	1
RANZ MOTOR SPORTS, INC		1	1
RATICAL AUTOMOTIVE		1	1
RDMI INC, CAL-STATE AUTO BODY & REPAIR		1	1
RECON SPECIALIST INC		1	1
REYES CUSTOM FURNITURE,MARTIN CAMACHO DB		1	1
RICH & FAMOUS AUTO BODY & UPHOLSTERY		1	1
ROBERT'S AUTO BODY & PAINT		1	1
ROCK & ROLL CUSTOM PAINTWORKS		1	1
ROCKETEER AUTO BODY		1	1
RODRIGUEZ REFINISHING		1	1
ROSE CITY COLLISION CENTER		1	1
ROYALTY AUTO BODY		1	1
RUBEN'S AUTO BODY		1	1
RUBEN'S AUTO COLLISION CENTER		1	1
RUDY'S AUTO CENTER, RODOLFO ESQUIVEL DBA		1	1
S & K AUTO BODY		1	1
S. R. A. AUTO BODY SHOP		1	1
SAHAR INC, ANTHONY'S PAINT & BODY SHOP		1	1
SAN FERNANDO COLLISION CENTER		1	1
SANTANA'S AUTO BODY		1	1
SATISFIED AUTO BODY,PEDRO MANZANAREZ DBA		1	1
SEIDNER'S COLLISION CENTER		1	1
SEIDNER'S COLLISION CENTERS		1	1
SHINE MOTORSPORTS		1	1

Retail/Service	811121	SIAM AUTO BODY	1
		SIDIKUS AUTO BODY & PAINT	1
		SILVAS AUTO BODY	1
		SLAUSON AUTO RESTORATION	1
		SMART LEVELS MEDIA	1
		SOLESBEE AUTO CRAFTS INC	1
		SOUTH BAY AUTO	1
		SOUTH BAY COLLISION CENTER, INC.	1
		SOUTH COAST ROOF INC	1
		SOUTH COUNTY AUTO BODY	1
		SPECIALIZED EQUIPMENT SERVICES	1
		SPECIALTY CAR CRAFT	1
		SPECTRUM 3D, INC	1
		SPEED SHOP CUSTOM PAINT	1
		SPEEDWAY COLLISION, SAM CARLOS DBA	1
		STARBUCK TRUCK REFINISHING INC	1
		STERLING AUTOBODY CENTERS	1
		STERLING COLLISION CENTER LLC	1
		STERLING COLLISION CENTERS, INC	1
		STEVES AUTO BODY	1
		STEVE'S T & G MOTORS	1
		STINGER COLLISION CENTER	1
		STUDIO CUSTOM AUTO BODY, S MOVSES DBA	1
		STUDIO SERVICES INC	1
		SUN WEST AUTO BODY	1
		SUNSET AUTO BODY & PAINT INC.	1
		SUPERIOR AUTO BODY	1
		SUPERIOR AUTO WRKS INC,SUPERIOR AUTO BDY	1
		TAPATIO AUTOMOTIVE	1
		TD AUTO BODY	1
		TEE PEE AUTOMOTIVE, BELLWOOD AUTO BODY	1
		TEMECULA AUTO BODY & PAINT	1
		THE AUTO PRO COLLISION CENTER II	1
		THE CAR-O-PRACTOR, TENEN CORP, DBA	1
		THE DING DOCTOR, INC.	1
		THE WESTSIDE GROUP	1
		TIKAL AUTO BODY WORK REPAIR & PAINTING	1
		TIP TOP AUTOBODY & PAINT	1
		TIRADOS AUTO BODY	1
		TOLES ENTERPRISES, INC.	1
		TOM BROS AUTO BODY & PAINT, V V NGUYEN	1
		TONY'S AUTO WORKS	1
		TRANSFORM QUALITY BODY WORK & PAINT	1
		TURY'Z CONCEPTS INC	1
		T-WRECKS BODY SHOP	1
		ULTIMATE COACHWORKS, INC.	1
		UNICAR AUTO BODY & PAINT	1
		UNIQUE COLLISION, STEPHEN ZOLIAN DBA	1
		V W SANTA MONICA INC	1
		VALLEY MOTOR CENTER, MARMAX PARTNERS INC	1
		VELASQUEZ AUTO BODY SPECIALISTS	1
		VERMONT AUTO COLLISION CENTER	1
		VINCENT'S GENERAL SERVICES	1
		VIP BUMPER & BODY REPAIR	1
		VISTA FORD AUTO BODY	1
		WEST AUTO BODY INC	1
		WEST COAST CUSTOMS	1
		WILLHOIT AUTO RESTORATION	1
		WILLIAMS AUTO BODY	1
		WILLIAMSON ENTERPRISES, I	1
		WILSON COMPLETE AUTO REPAIR INC	1
		WOODLAND HILLS AUTO BODY, A BAKCHAJIAN	1
		XTREME AUTO BODY	1
		Y & S AUTO BODY SHOP	1
		Y & S ENTERPRISES INC	1
		YOSEMITE AUTO BODY SHOP	1
		Z BEST PAINT	1
		ZD AUTOBODY INC	1

Retail/Service	811121	ZUKIE ENT. DBA LEMAN'S BODY & PAINT	1
	811122	ALPHA SPRAY POWDER COATING	1
		ANTIQUED MIRRORS CO	1
		ARATH METAL FINISHING	1
		CASTOR AUTOMOTIVE CENTER/QUEEN	1
		CLASSIC TOUCH AUTO	1
		FIRST PLACE POWDER COATING	1
		MEGA MET INC.	1
		RAINBOW CUSTOM COATING	1
		RITeway AUTO PAINT AND BODY WORKS	1
	811192	A-Z AUTO BODY	1
		BEACON BAY AUTO WASH	1
		BRENT WEST CAR WASH	1
		C & S CAR WASH SHELL	1
		CAR WASH OF AMERICA	1
		CONOCOPHILLIPS CO #257344,ACWA ASSOCIATE	1
		EL MONTE AUTO SPA & RESORT	1
		EXXONMOBIL #11590, EMILE KHEIR	1
		FOOTHILL CAR WASH & DETAIL	1
		GATEWAY AUTO SPA	1
		GLENROCK CARWASH, GARY WIMMER	1
		LAGUNA NIGUEL CARWASH	1
		LOS ANGELES CAR WASH CORP	1
		MOULTON PARKWAY AUTO SPA, K. OKKO, DBA	1
		PREMIER COLLISION CENTER	1
		SAN CLEMENTE CARWASH	1
		SHELL OIL PRODUCTS US-HSE/S&E	1
		SPARKLE CAR WASH	1
		TELEGRAPH DIESEL & MINI MART	1
		TUSTIN PLAZA AUTO WASH	1
		VALENCIA AUTO CARE CENTER	1
		WESTERN & 4TH CAR WASH	1
		WESTLAKE VILLAGE CAR WASH INC.	1
		WINC INC., CYPRESS CAR WASH	1
	811198	A.I. CRAFT CO., LTD.	1
		BUDGET GRAPHIC SERV. & TRAILER	1
		C X TECH	1
		EXXONMOBIL, HANNA S HANNA,11270, #18-L81	1
		GOLD STAR WIRE WHEELS	1
		MARK HUNTER CUSTOM PAINT	1
		MV DESIGNZ	1
		PACIFIC COAST RETREADERS	1
		RECON WHEEL & BUMPER INC	1
		THE WESTSIDE GROUP, LLC	1
		TOM BELL CHEVROLET	1
		WEST COAST CUSTOMS	1
	811211	WINGFOOT COMMERCIAL TIRE SYSTEMS, LLC	1
		CHROMALLOY LOS ANGELES	1
		INTERNATIONAL CARGO EQUIPMENT INC	1
		LITTLEJOHN-REULAND CORP	1
		PRAXAIR SERVICES, INC.	1
		T MARKUS CUSTOM PAINTING / TONY MARKUS	1
	811212	A & D ELECTRONICS	1
	811219	FLOWSERVE U S INC	1
		TED LEVINE DRUM CO	1
		(blank)	1
	811310	E & L ELECTRIC	1
		GOLDEN TOUCH AUTO BODY,NORIK SETAREH DBA	1
		HRD AERO SYSTEMS, INC	1
		RAINBOW TRANSPORT TANK CLEANERS,C.ALBIN	1
		SULLIVAN CONCRETE TEXTURES	1
	811400	R & C VALVE REPAIR, INC.	1
	811411	NOEL SHARPENING & WELDING CENTER	1
	811412	A-MOBILE REFINISHING & REPAIR WOOD SRVC	1
		BIG GUY AUTO BODY REPAIR LLC	1
	811420	AL'S WOODCRAFT INC.	1
		ART'S WOOD REFINISHING	1
		BMP AUTO BODY & PAINT	1

Retail/Service	811420	BROTHERS SANDBLASTING, J VILLALPANDO	1
		COASTLINE METAL FINISHING	1
		CRAIG FURNITURE REPAIR & REFINISHING	1
		CUSTOM WOOD FINISHING LLC	1
		D F FINISHING	1
		DESERT BROTHERS REFINISHING	1
		EMILIO'S FINISHING STUDIOS	1
		FINISHING TOUCH	1
		GEORGE'S ANTIQUES & RESTORATION	1
		J & J WOOD REFINISHING	1
		KEN JACKSON FINISHING	1
		MURPHY'S TOUCH, PAUL J. MURPHY DBA	1
		R & N FURNITURE REFINISHINGS	1
		R. HIGGINS QUALITY FINISHING	1
		R. W. INC, RECOATING WEST DBA	1
		SAM ROHLOFF	1
		SHUTTERS LAKE	1
	811430	JB MARK ALLEN HOTEL VALET CLEANER'S	1
		M & M CLEANERS	1
	811490	CANYON PLAZA CLEANERS	1
		CAPITOL ARTS & FRAME	1
		DRICAL LAUNDRY SERVICES	1
		ELI INDUSTRIES INC	1
		FRANK MUSLAR REFINISHING, FRANK MUSLAR D	1
		GRAND VIEW CLEANERS	1
		J. R. WELDING CO.	1
		PLAZA CLEANERS, KIRIT PATEL, DBA	1
		PUEBLA WELDING, INC.	1
		RENE'S WELDING, ISRAEL CAMORLINGA DBA	1
		Repair and Maintenance Total	840
		Sporting Goods, Hobby, Book, and Music Stores	
	451110	BRAD BASHAM SURFBOARDS, BRAD BASHAM DBA	1
		CITY OF BURBANK/WATER AND POWER	1
		KAYSEN SURF DESIGNS INC	1
		MONTEBELLO MUNICIPAL GOLF COURSE	1
	451120	COSTAL AIRBRUSH	1
	451130	UNIPOLO FABRIC CORP	1
	451211	LA CO., MUSEUM OF ART	1
		LA SOUTHWEST COLLEGE	1
		NO ORANGE CO., COMM COLLEGE DIST, CYPRESS	1
	451220	US GSA, CHET HOLIFIELD FEDERAL BUILDING	1
		Sporting Goods, Hobby, Book, and Music Stores Total	10
		Retail/Service Total	2621
Transportation			
	Air Transportation		
	481111	CONTINENTAL AIRLINES UNIT NO.02	1
		NORTHWEST AIRLINES INC	1
	481219	FRENCH VALLEY AVIATION INC	1
		Air Transportation Total	3
	Pipeline Transportation		
	486110	SEMMATERIALS L.P.	1
		SFPP, L.P.	1
	486210	EQUILON ENTER. LLC, SHELL OIL PROD. US	1
		EQUILON ENTERPRISES LLC	1
		LOMITA RAIL TERMINAL, LLC	1
		SO CAL GAS CO - SAN DIMAS	1
		SO CAL GAS CO (EIS USE)	1
		SO CAL GAS CO/PLAYA DEL REY STORAGE FACI	1
	486910	ARCO PRODUCTS CO	1
		SFPP, L.P.	1
		SFPP, L.P. (NSR USE ONLY)	1
		Pipeline Transportation Total	11
	Rail Transportation		

Transportation	482111	ALAMEDA CORRIDOR TRANSPORTATION AUTHORIT	1
		BURLINGTON NORTHERN SANTA FE RAILWAY	1
		UNION PACIFIC RAILROAD	1
		UNION PACIFIC RAILROAD CO	1
		Rail Transportation Total	4
		Support Activities for Transportation	
	488000	J. E. DEWITT INC, JEDI #8	1
		LOS ANGELES WORLD AIRPORT	1
		MARCH INLAND PORT AIRPORT AUTHORITY/TAS	1
		PORT OF LONG BEACH	1
	488111	LA CITY, DEPT OF AIRPORT	1
	488119	AIRCRAFT SERVICE INT'L GROUP (ASIG)	1
		BURBANK-GLENDALE-PAS. AIRPORT AUTHORITY	1
		CLAY LACY AVIATION	1
		COUNTY OF SAN BERNARDINO, CHINO AIRPORT	1
		FLABOB AIRPORT, LLC	1
		MENZIES AVIATION GROUP, INC.	1
		ORANGE, COUNTY OF - JOHN WAYNE AIRPORT	1
		SNAFUEL INC	1
	488190	AERO WHEEL & BRAKE SERVICE	1
		SIGNATURE FLIGHT SUPPORT	1
		UNITED AIRLINES INC	1
	488210	D & S INGREDIENT TRANSFER CO INC	1
		ECOLOGO AUTO PARTS	1
	488320	INTERNATIONAL TRANSPORTATION SVC. INC	1
		LONG BEACH CONTAINER TERMINAL INC	1
		METROPOLITAN STEVEDORE CO	1
		METROPOLITAN STEVEDORE COMPANY	1
		PACIFIC LA MARINE TERMINAL LLC	2
		THUMS LONG BEACH CO, SAN PEDRO BAY	1
	488410	EXXONMOBIL OIL CORP SS# 18-BV7 / 11429	1
		GERMAN CENTENO'S AUTO, TRUCK SRV CTR INC	1
		GOLDEN TOUCH AUTO BODY, INTL AUTO TECH D	1
		HADLEY COLLISION CENTER	1
		OUR PRIDE COLLISION REPAIR, J L DICKSON	1
		ROYAL COACHES AUTOBODY	1
	488490	BASIN VALVE COMPANY	1
		CONOCOPHILLIPS COMPANY	1
		FEDEX FREIGHT WEST	1
	488510	APM TERMINALS - MPL	1
		CON-WAY FREIGHT - USB	1
		DC CARLSON ENT INC/SO BAY CHOPPERS	1
		DYNAMIC AIR TECHNOLOGY INC	1
		TARGET LOGISTIC SERVICES	1
	488999	CALNEV PIPE LINE, LLC	1
		PACIFIC TERMINALS LLC	1
		PACIFIC TERMINALS LLC - LONG BEACH	1
		PLAINS EXPLORATION AND PRODUCTION CO	2
		Support Activities for Transportation Total	44
		Transit and Ground Passenger Transportation	
	485000	FASTLANE TRANSPORTATION	1
		FOOTHILL TRANSIT	1
		OMNITRANS	1
	485112	G & M OIL CO, LLC #82	1
	485113	LA CO., METROPOLITAN TRANS AUTHORITY	1
		LONG BEACH TRANSIT	1
		LOS ANGELES CO METRO TRANS AUTH (MTA)	1
		ORANGE COUNTY TRANSPORTATION AUTHORITY	1
		TWO HARBORS ENTERPRISES, INC	1
	485119	CITY OF SANTA MONICA EPD/BIG BLUE BUS	1
		LA CO., METROPOLITAN TRANS AUTHORITY	2
		MONTEBELLO CITY, CORPORATE YARD	1
	485210	MV TRANSPORTATION, INC.	1
	485410	OMNI TRANS	1

Transportation	485410	TEMECULA VALLEY UNI SCH DIST FACILITY	1
	485510	RYANS EXPRESS MOTORCOACH	1
	485999	BLS LIMOUSINE SERVICE OF LOS ANGELES INC	1
Transit and Ground Passenger Transportation Total			18
Truck Transportation			
	484110	1-800-DRYCLEAN OF ORANGE COUNTY	1
		ACCESS BUSINESS GROUP LLC, NUTRILITE	1
		ADVANCED ENVIRONMENTAL INC	1
		ANCON MARINE INC	1
		AVALON PREMIUM TANK CLEANING	1
		COMM RECYCLING & RESOURCE RECOVERY INC	1
		DINEEN TRUCKING INC	1
		ECOLOGY CONTROL INDUSTRIES	1
		MAERSK DISTRIBUTION SERVICES INC	1
		PRESSING MATTERS, VICKI S. GUNTHER DBA	1
		SCHICK MOVING & STORAGE INC	1
		STD CONCRETE MATERIALS INC	1
		WASTE MGMT DISP & RECY SERV INC (BRADLEY	1
	484121	ROADWAY EXPRESS	1
		SYSTEM TRANSPORT	1
		W A WOODS INDUSTRIES INC	1
	484122	FEDEX FREIGHT WEST	1
Truck Transportation Total			17
Water Transportation			
	483111	FOSS MARITIME	1
		TERMINAL SERVICE COMPANY	1
	483113	YUSEN TERMINALS, INC.	1
Water Transportation Total			3
Transportation Total			100

Utilities			
	Utilities		
	221000	FONTANA WATER COMPANY	1
		J&A-WHITTIER LLC	1
		JOE'S 76	1
		LA CITY, DWP, GREEN VERDUGO PS	1
		LEE LAKE WATER DISTRICT	1
		SANTA MARGARITA WATER DISTRICT	1
		SO CAL WATER CO	1
		SUBURBAN WATER SYSTEMS, PLANT 201 W9	1
		SUBURBAN WATER SYSTEMS, PLANT 216 B-8	1
	221100	NP COGEN INC	1
		VALLE DEL SOL ENERGY, LLC	1
		WELLHEAD POWER COLTON LLC	1
	221110	LA CITY, DWP HAYNES GENERATING STATION	1
		LA CITY, DWP SCATTERGOOD GENERATING STN	1
		LA CITY, DWP VALLEY GENERATING STATION	1
	221111	CITY OF CORONA, DEPT OF WATER & POWER	1
		LA CITY DWP, CALNEVA PUMPING STN	1
		LA CITY DWP, DE SOTO P.S.	1
		LA CITY DWP, ENCINO PUMPING & CHLOR STA	1
		LA CITY DWP, ESTEPA P.S.	1
		LA CITY DWP, GIRARD PUMPING STN	1
		LA CITY DWP, LAUREL CANYON P.S.	1
		LA CITY DWP, REDMONT P.S.	1
		LA CITY DWP, SIMSHAW P.S.	1
		LA CITY DWP, TRAILER PUMPING STATION	1
		LA CITY, DWP	2
		METRO WATER DIST OF SO CAL	1
	221119	AES ALAMITOS, LLC	1
		AES HIGHGROVE, LLC	1
		AES REDONDO BEACH, LLC	1
		BLACK HILLS ONTARIO LLC	1
		CAL ST, WATER RESOURCES DEPT	1
		CARSON COGENERATION COMPANY	1
		LONG BEACH PEAKERS LLC	1

Utilities	221119	MM PRIMA DESHECHA ENERGY, LLC	1
		NM MID VALLEY GENCO LLC	1
		NM MILLIKEN GENCO, LLC	1
		RELIANT ENERGY ETIWANDA, INC.	1
		RIDGEWOOD POWER MANAGEMENT, LLC	1
		SO CAL EDISON CO	6
		SO CAL EDISON CO	1
		SO CAL EDISON COMPANY	1
		SOUTHERN CALIFORNIA EDISON	1
		(blank)	1
	221122	GOLDEN ST. WATER CO, DBA BEAR VLY ELEC.	1
		PACIFIC TERMINALS LLC	1
	221200	DIGAS COMPANY	1
		NP GAS INC	1
		RAPID GAS INC #75	1
	221210	APPLIED LNG TECHNOLOGIES USA LLC	1
		LONG BEACH CITY, GAS DEPT	1
		MAJID NAZARI	1
		MSRK INC - PLAYA VISTA	1
		SO CAL GAS CO	3
		THE GAS CO./ SEMPRA ENERGY	1
		UNITED EL SEGUNDO, INC. UNITED OIL #8	1
	221300	WASTE MANAGEMENT CARSON TRANSFER STATION	1
	221310	CALIFORNIA DOMESTIC WATER	1
		CHINO BASIN DESALTER AUTHORITY	1
		CITY OF HUNTINGTON BEACH- WATER OPER.	1
		CITY OF SAN BERNARDINO MUNICIPAL WTR DPT	1
		COACHELLA VALLEY WATER DIST	1
		COACHELLA VALLEY WATER DIST(WPR 7)	1
		COACHELLA VALLEY WATER DISTRICT (WRP4)	1
		COMPTON CITY, MUNICIPAL WATER DISTRICT	1
		CRESTLINE-LAKE ARROWHEAD WATER AGENCY	2
		EAST VALLEY WATER DISTRICT	1
		EASTERN MUNICIPAL WATER D	1
		EASTERN MUNICIPAL WATER DIST	1
		EASTERN MUNICIPAL WATER DISTRICT	13
		HUNTINGTON BEACH CITY, WATER DEPT	1
		INLAND EMPIRE UTILITIES A	1
		INLAND EMPIRE UTL AGEN, A MUN WATER DIS	1
		IRVINE RANCH WATER DIST	2
		IRVINE RANCH WATER DISTRICT	3
		LA CITY, DWP	2
		LA CO, DEPT OF PUBLIC WORKS-FLOOD MAINT	1
		LAKE HEMET WATER DISTRICT	1
		LAS VIRGENES MUNICIPAL WATER DISTRICT	2
		LEE LAKE WATER DISTRICT	1
		MESA CONSOLIDATED WATER DIST	1
		METROPOLITAN WATER DIST OF SO CAL	2
		METROPOLITAN WATER DISTRICT OF SO CAL	2
		MONTEBELLO LAND & WATER CO	1
		MOULTON NIGUEL WATER DIST	1
		MOULTON NIGUEL WATER DISTRICT	1
		NEWHALL COUNTY WATER DISTRICT	1
		ORANGE COUNTY WATER DISTRICT	1
		RANCHO CALIFORNIA WATER DISTRICT	1
		RIVERSIDE CITY, WATER QUALITY CONTROL	1
		ROWLAND WATER DISTRICT	1
		SAN CLEMENTE CITY	1
		SAN GABRIEL COUNTY WATER DISTRICT	1
		SANTA MARGARITA WATER DISTRICT	2
		SOUTH MONTEBELLO IRRIGATION DIST	1
		THE GAGE CANAL COMPANY	2
		UNITED PARCEL SERVICE COMPANY	1
		WEST BASIN MUNICIPAL WATER DISTRICT	1
		WESTERN MUNICIPAL WATER DISTRICT	3
		YORBA LINDA WATER DIST	2
		YORBA LINDA WATER DISTRICT	2
		YORBA LINDA WATER DISTRICT-TIMBER RIDGE	1

Utilities	221310	YUCAIPA VALLEY WATER DIST	1
	221320	BIG BEAR AREA REGIONAL WASTEWATER	1
		EASTERN MUNICIPAL WATER DISTRICT	1
		LA CO SANITATION DISTRICT	1
		LA CO, SANITATION DIST/BCH AVE PUMP PLAN	1
		LA CO., SANITATION DISTRICT	4
		ORANGE COUNTY SANITATION	1
		RUNNING SPRINGS WATER DIST-TREATMNT PLNT	1
		SO ORANGE CO. WASTEWATER AUTH -3-A	1
		STATE OF CALIF, DEPT OF TRANSPORTATION	1
		VALLEY SANITARY DIST	1
		Utilities Total	150
Utilities Total			150
Grand Total			6230

APPENDIX F

PRIMARY FACILITY CATEGORIES LOCATION MAPS

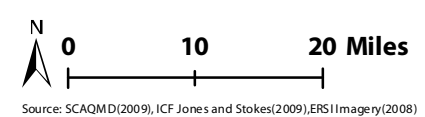
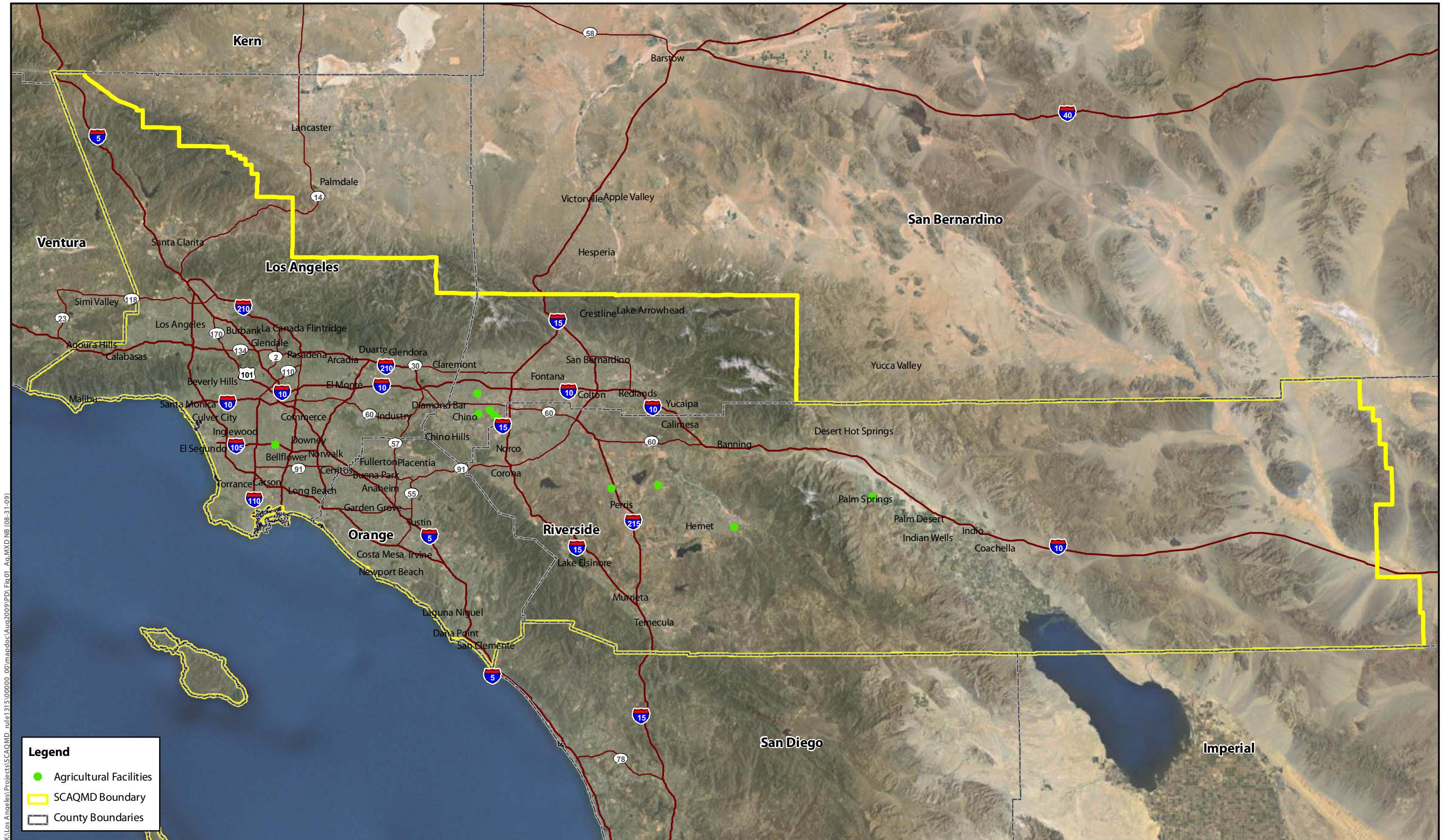
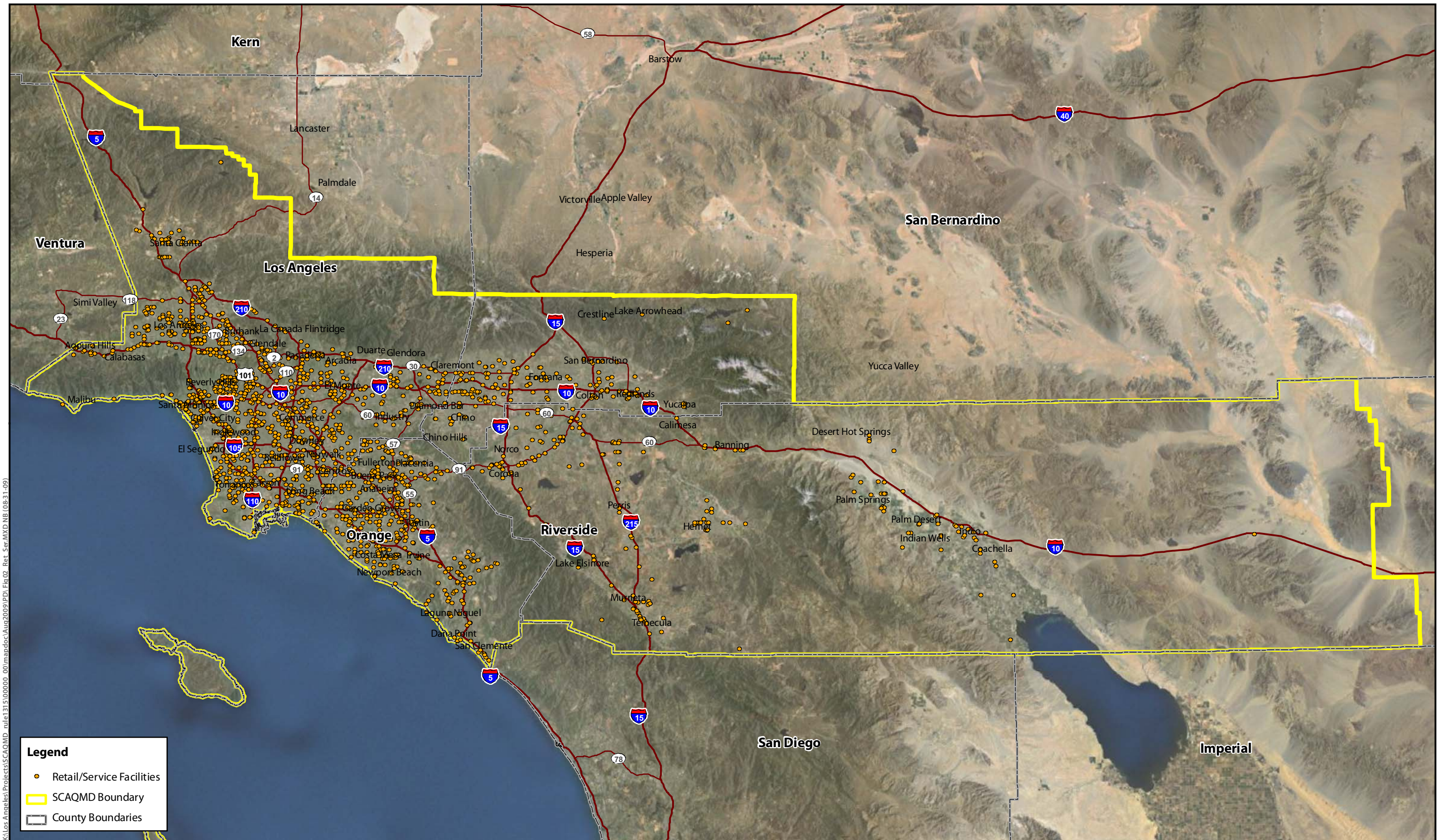
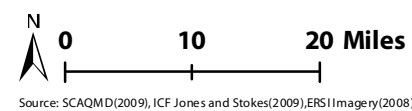


Figure 1
Agricultural Facilities within South Coast Air Quality Management District



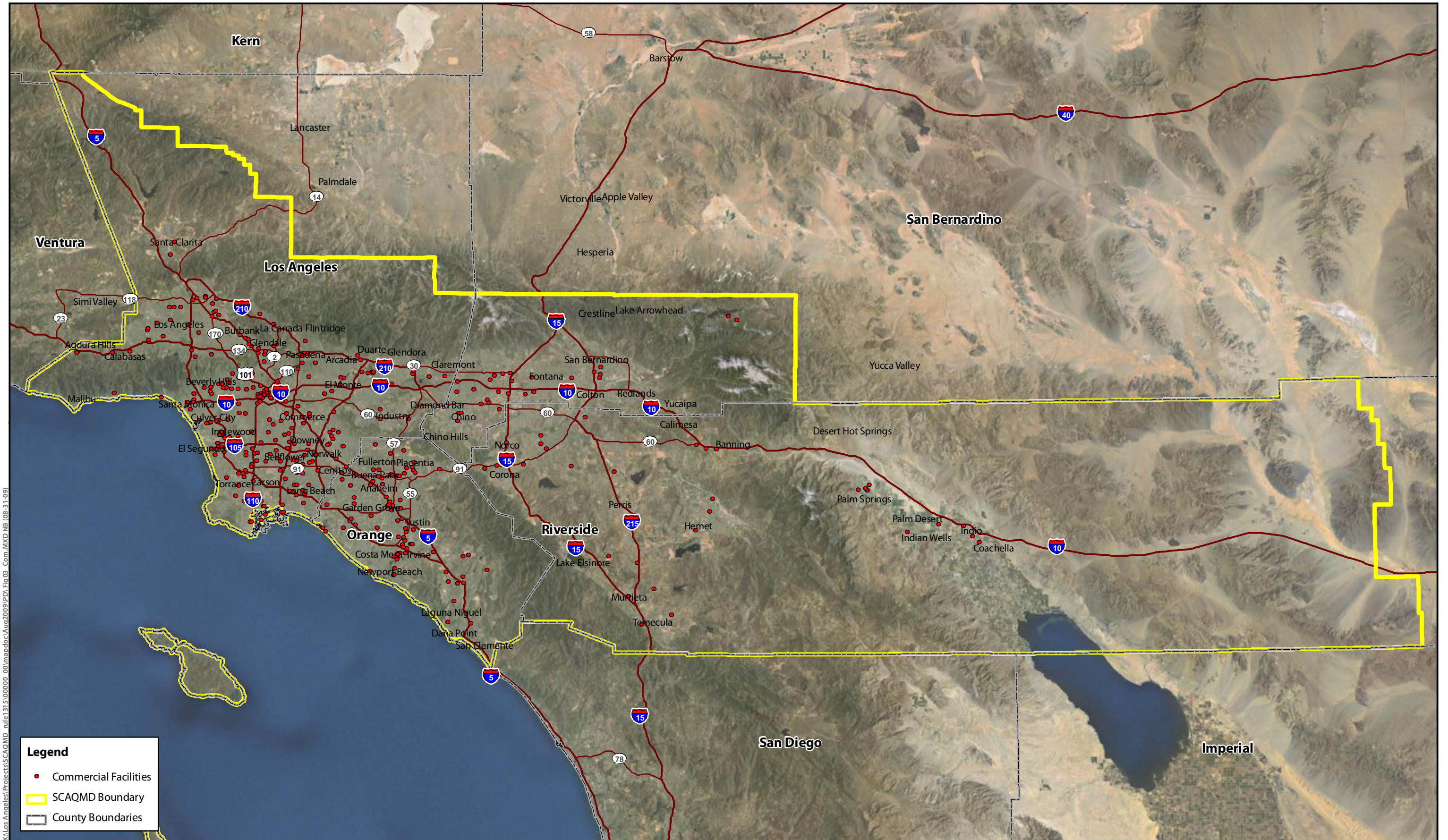
Legend

- Retail/Service Facilities
- SCAQMD Boundary
- County Boundaries



Source: SCAQMD(2009), ICF Jones and Stokes(2009), ERSI Imagery(2008)

Figure 2
Retail/Service Facilities within South Coast Air Quality Management District



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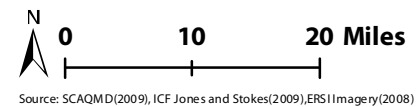


Figure 3
Large Commercial Facilities within South Coast Air Quality Management District

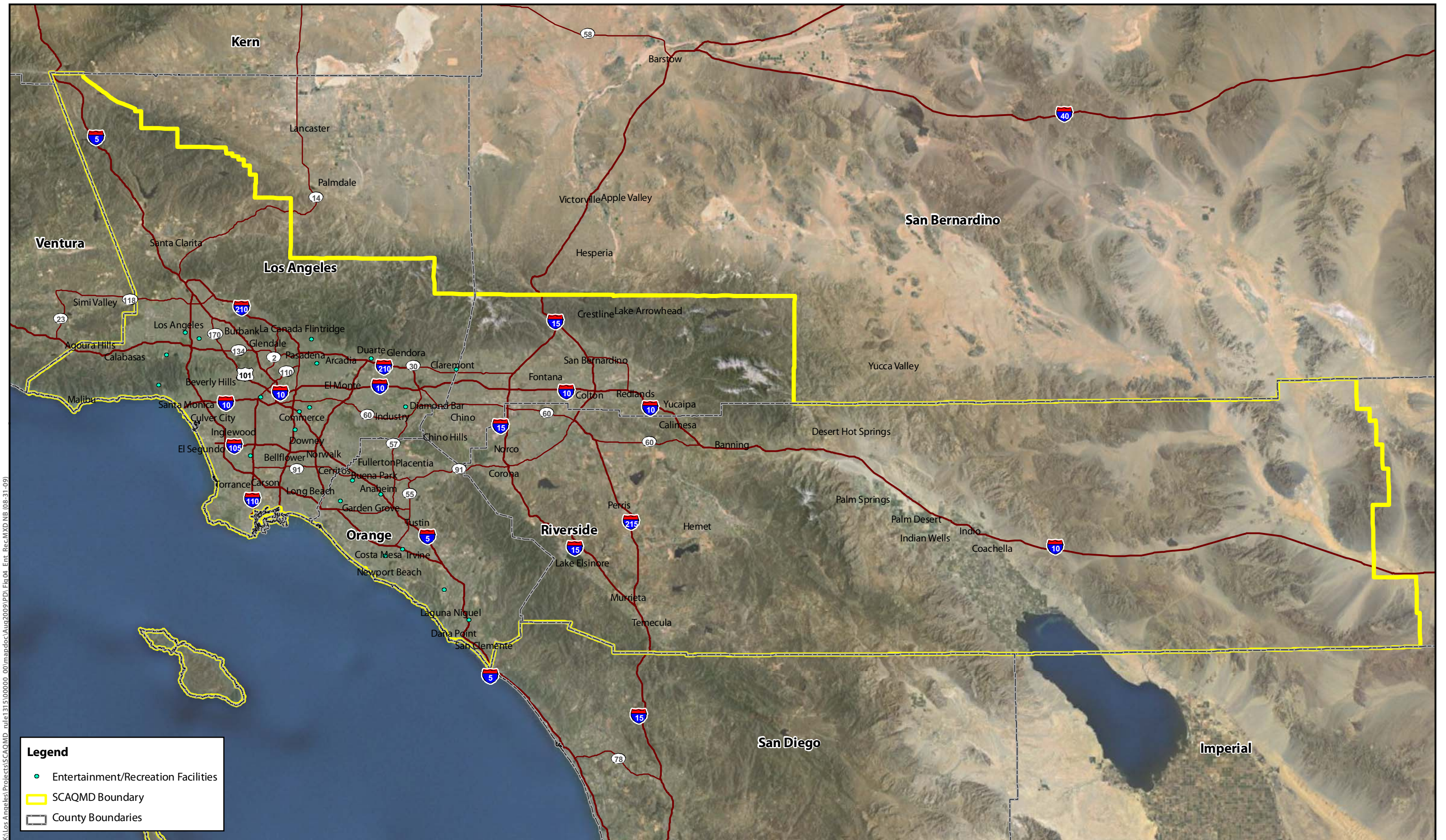
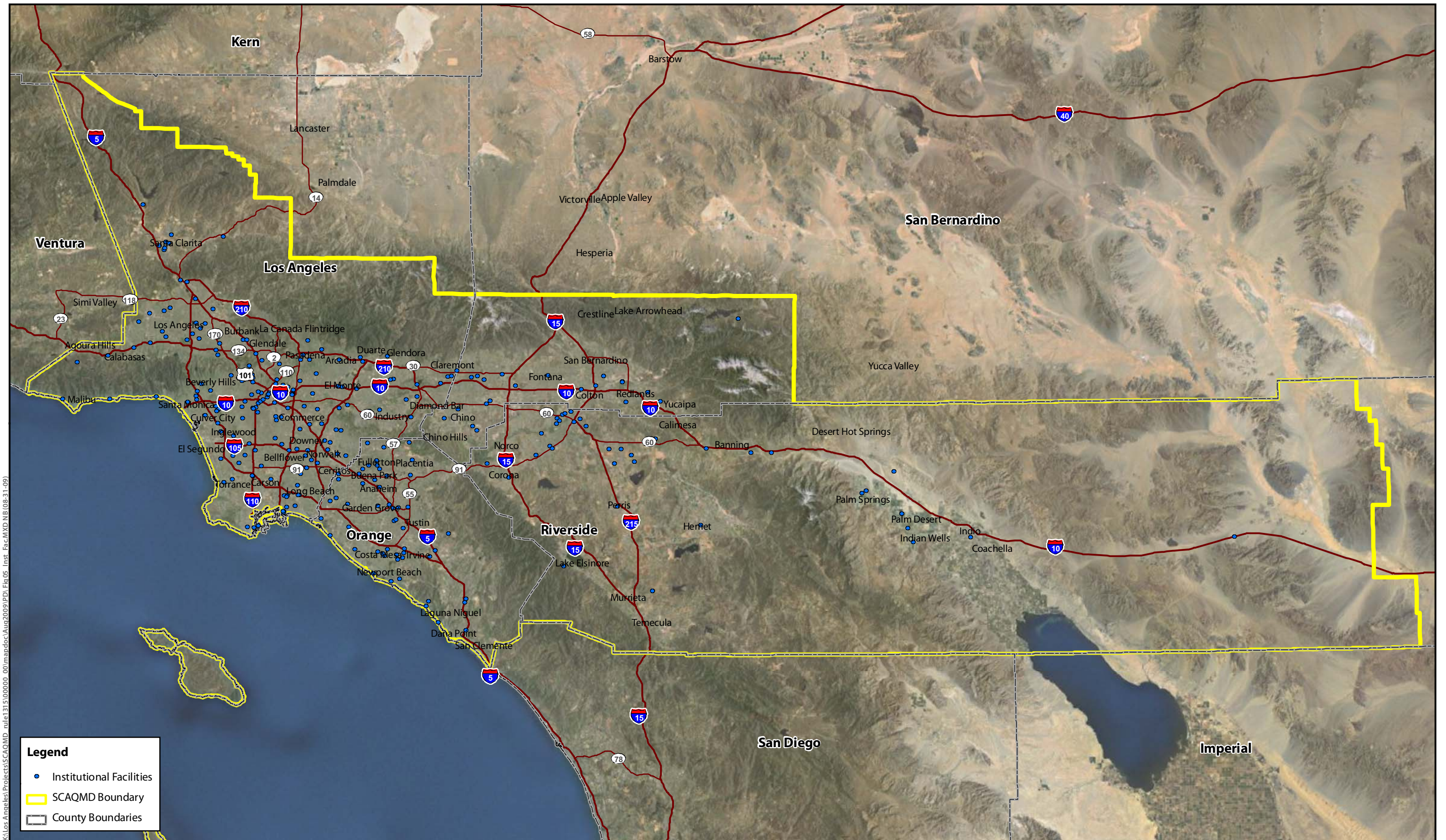


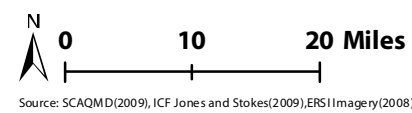
Figure 4
Entertainment/Recreational Facilities within South Coast Air Quality Management District



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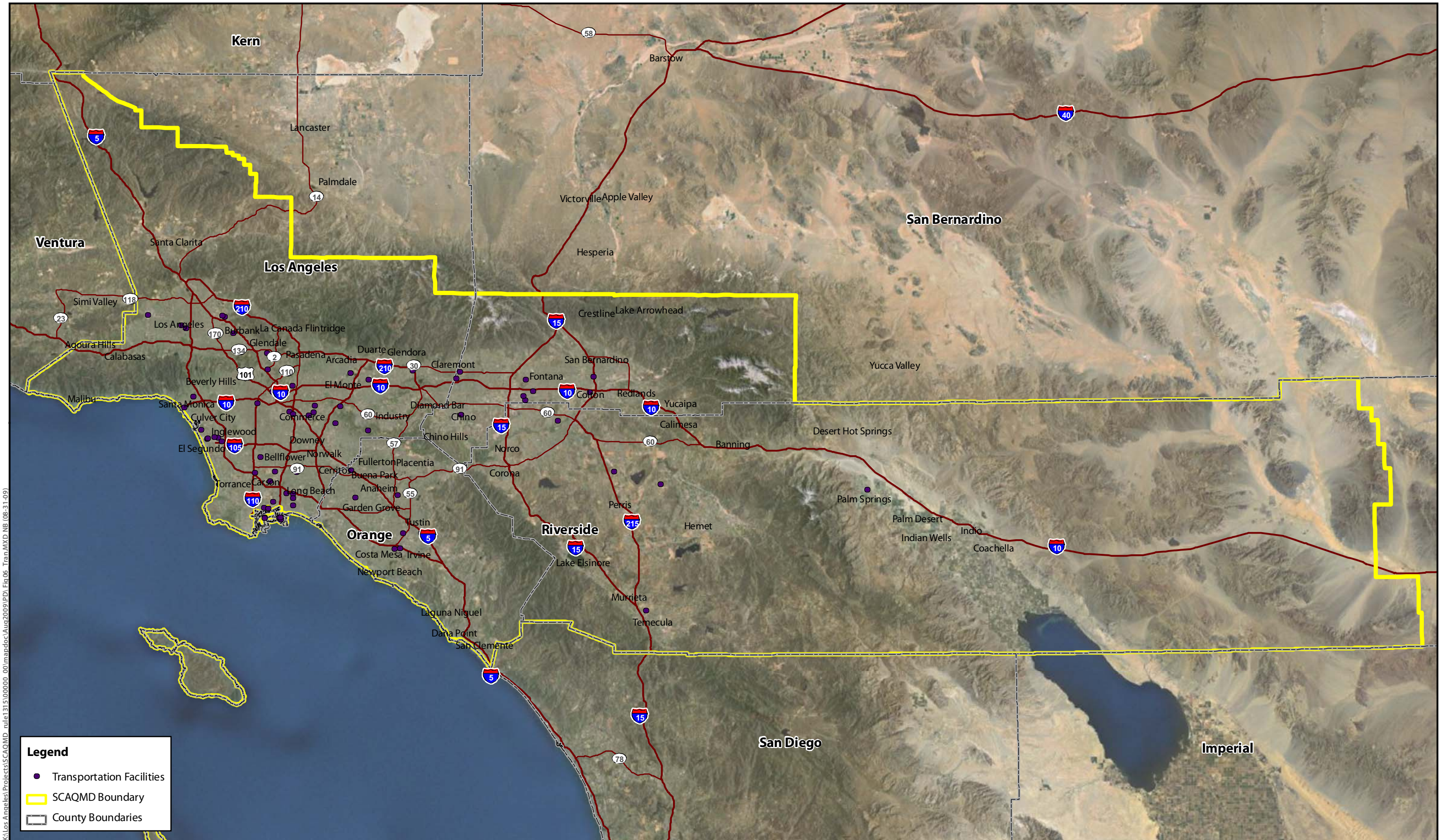
Legend

- Institutional Facilities
- SCAQMD Boundary
- County Boundaries



Source: SCAQMD(2009), ICF Jones and Stokes(2009), ERSI Imagery(2008)

Figure 5
Institutional Facilities within South Coast Air Quality Management District



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Legend

- Transportation Facilities
- SCAQMD Boundary
- County Boundaries

N
 0 10 20 Miles
 Source: SCAQMD(2009), ICF Jones and Stokes(2009), ERSI Imagery(2008)

Figure 6
Transportation Facilities within South Coast Air Quality Management District



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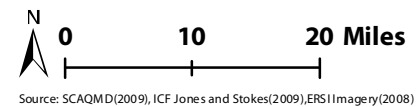


Figure 7
Utility and Power Generating Facilities within South Coast Air Quality Management District

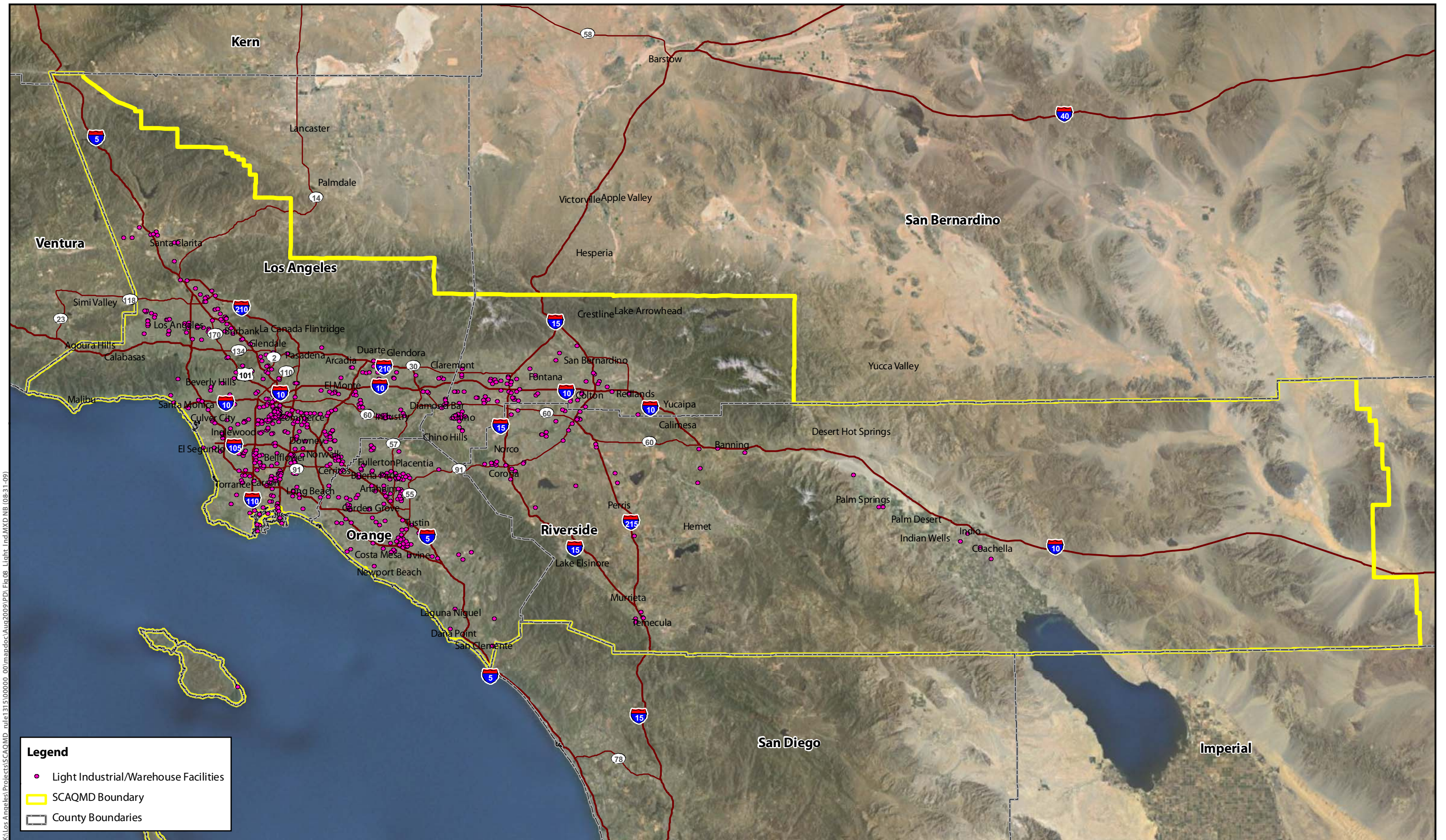


Figure 8
Light Industrial/Warehouse Facilities within South Coast Air Quality Management District

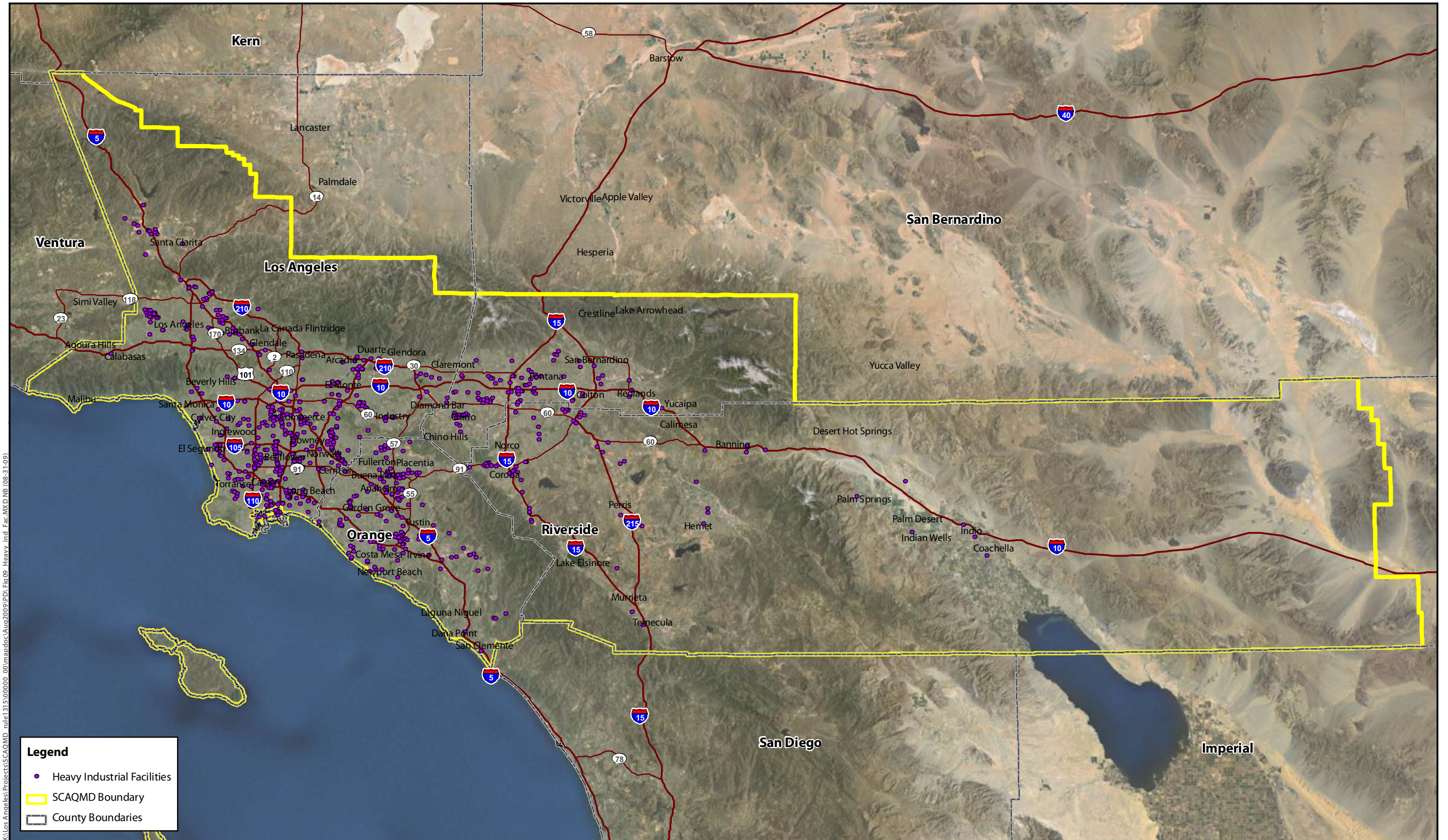


Figure 9
Heavy Industrial Facilities within South Coast Air Quality Management District

APPENDIX G

(APPENDIX G HAS BEEN WITHDRAWN)

APPENDIX H

FACILITIES AFFECTED BY PERMIT MORATORIUM

Examples of Projects Affected by the SCAQMD Permit Moratorium

EMISSION REDUCTION PROJECTS					EMISSION REDUCTIONS NOT ACHIEVED				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project	NOx	CO	PM10	VOC	SOx
Advanced Cardiovascular System	Medical Services	Temecula	Facility makes most heart stents used in the U.S.	Replace three existing boilers with three new state of the art, cleaner units that are more energy efficient	10 lbs/day	2 lbs/day			
Allergan	Medical Services	Irvine	Pharmaceutical company	Replace an existing emergency back up generator with a new state of the art, cleaner unit that is more energy efficient.	31 lbs/day	2 lbs/day	3 lbs/day		
Armorcast Products	Manufacturer	North Hollywood	Facility manufactures utility boxes.	Install a new air pollution control system (regenerative thermal oxidizer) to control emissions from 3 spray booths and a resin mixing and pouring enclosure.				43 lbs/day	
Avalon Glass & Mirror	Manufacturer	Carson	Facility manufactures mirrors.	Replacing an old air pollution control system with a new unit to reduce VOC emissions from their mirror backing coating equipment.	7 lbs/day			2 lbs/day	
Cal Pet Crematory	Crematory	Sun Valley	Crematory	Replacing six existing crematories with six state of the art units that are more energy efficient.	Small reduction				

EMISSION REDUCTION PROJECTS					EMISSION REDUCTIONS NOT ACHIEVED				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project	NOx	CO	PM10	VOC	SOx
Clean Air Logix	Contractor	Various locations in Ports of Los Angeles and Long Beach	Contractor	Providing shore side power for ships during loading and unloading at the berth by using a natural gas-fired engine with state of the art controls so that ships can shut down high emitting auxiliary boilers and engines during loading and unloading operations.	125 lbs/day	11 lbs/day	13 lbs/day		96 lbs/day
New Basis	Manufacturer	Riverside	Facility manufactures polymer concrete cast enclosures for cables.	Replacing its old air pollution control system with a new and more efficient unit	2 lbs/day			27 lbs/day	
Pacific Fruit Processors	Food Services	Southgate	Food production facility.	Replacing an existing boiler with a new state of the art, cleaner unit that is more efficient	3 lbs/day				
Providence Holy Cross Medical Center	Medical Services	Mission Hills	Hospital	Replacing burners on two (2) existing boilers with new state of the art, cleaner burners.	16 lbs/day	136 lbs/day			
S A Recycling LLC	Recycling Services	Anaheim	Auto shredding and recycling plant	Modifying the existing air pollution control system by adding a regenerative thermal oxidizer				60 lbs/day	

EMISSION REDUCTION PROJECTS					EMISSION REDUCTIONS NOT ACHIEVED				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project	NOx	CO	PM10	VOC	SOx
Tesoro Los Angeles Refinery	Refinery	Wilmington	Refinery	Installing a new 42 MW cogeneration plant and two new boilers to replace two older and dirtier cogeneration units (60 MW total) and four older boilers.	1,527 lbs/day	1,913 lbs/day	1 lb/day	4 lbs/day	416 lbs/day
The Kroger Co/Ralphs Grocery	Food Services	La Habra	Supermarkets	Replacing an existing oven with a new state of the art, cleaner unit that has a lower heat input rating	Small reduction				
TOTAL EMISSION REDUCTIONS NOT ACHIEVED					1,721 lbs/day	2,064 lbs/day	17 lbs/day	136 lbs/day	512 lbs/day

MEDICAL AND HEALTH CARE PROJECTS				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project
Beach Cities Health District	Medical Services	Redondo Beach	Hospitals, medical centers	Installing three boilers to provide additional heat capacity to the health care district
Beckman Coulter, Inc.	Medical Services	Brea	Facility manufactures raw material for medical instruments.	Install a chemical synthesis, purification and drying systems.
Diversified Silicone Products Inc	Medical Services	Santa Fe Springs	Facility manufactures medical industry products	Installing an oven.
GIP 7th Street	Medical Services	Los Angeles	Facility is a large data center that maintains medical as well as other records	In order to safeguard these records, the company is proposing to install 3 emergency backup generators for use during power outages.

MEDICAL AND HEALTH CARE PROJECTS				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project
Glendale Adventist Medical Center	Medical Services	Glendale	Hospital	Installing emergency generators to provide additional back-up power for use during power outages
Kaiser Permanente Ontario Vineyard Medical Center	Medical Services	Ontario	Hospital	Installing boiler to provide additional heat capacity for medical center
Paragon Labs, Natural Life Eco Vite Labs	Medical Services	Torrance	Facility manufactures dietary supplements	Installing an oven and a mixer.
Providence Holy Cross Medical Center	Medical Services	Mission Hills	Hospital	Replacing burners on two (2) existing boilers with new state of the art, cleaner burners.
Rancho Specialty Hospital	Medical Services	Rancho Cucamonga	Hospital	Installing emergency generator to provide additional back-up power for use during power outages
Varian Inc.	Medical Services	Lake Forest	Facility manufactures chemical substances for medical/health testing	Installing an oven.

RENEWABLE ENERGY PROJECTS, SEWAGE TREATMENT PLANTS, LANDFILLS & WATER SERVICE OPERATIONS				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project
Banning City	Essential Public Services	Banning	Sewage treatment plant	Installing a new boiler and a backup flare to utilize renewable digester gas to generate steam for in-plant use
Bowerman Power Lfg, Llc	Essential Public Services	Irvine	Landfill	5 electrical generating units and control system (flares) to use renewable landfill gas to produce electricity and reduce release of methane, a greenhouse gas, and odors into the atmosphere
City Of Huntington Beach- Water Operations	Essential Public Services	Huntington Beach	Water treatment plant	Replacing older engine with new state of the art and cleaner natural gas fired engine
City Of Monrovia, Dept Of Public Works	Essential Public Services	Monrovia	Water treatment plant	Modifying groundwater treatment system to cleanup contaminated well water to increase drinking water supply
City Of Torrance	Essential Public Services	Torrance	Landfill	Installing landfill gas collection system to collect landfill gas generated at dump site to prevent migration offsite and release of methane and odors into the atmosphere
Coachella City	Essential Public Services	Coachella	Sewage treatment plant	Installing emergency backup generator for use during power outages and continue treating raw sewage sludge
Eastern Municipal Water District	Essential Public Services	Temecula, Perris, San Jacinto, Moreno Valley	Sewage treatment plant	Modification to upgrade sewage treatment plant and biofilter used to control emission of organic gases and install emergency backup generator for use during power outages
Irvine Ranch Water District	Essential Public Services	Irvine	Sewage treatment plant	Installing internal combustion engine for sewage pumping and emergency backup generator for use during power outages

RENEWABLE ENERGY PROJECTS, SEWAGE TREATMENT PLANTS, LANDFILLS & WATER SERVICE OPERATIONS				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project
La City Bureau Of Sanitation, Hyperion Treatment Plant	Essential Public Services	Playa Del Rey	Sewage treatment plant	Installing control system (flare) to mitigate odors and dispose of excess digester gas when it is not used as renewable energy
La County Sanitation District	Essential Public Services	Rolling Hills Estates	Landfill	Installing electrical generating units and a backup flare to use renewable landfill gas to produce electricity to replace older and less efficient units
Mm West Covina LLC	Essential Public Services	West Covina	Landfill	Utilizing renewable energy (landfill gas) for power generation
Orange County Sanitation District	Essential Public Services	Fountain Valley	Landfill	Replacement of older less efficient boiler using renewable fuel (digester gas) for steam generation with new state of the art and cleaner unit
Ridgewood Power Management, LLC	Essential Public Services	Brea	Landfill	Utilizing renewable energy (landfill gas) for power generation
Riverside City	Essential Public Services	Riverside	Sewage treatment plant	Modification to expand existing sewage treatment plant
Riverside County Waste Management	Essential Public Services	Thousand Palms, Rubidoux	Landfill	Landfill condensate collection and handling and control system (flares) to dispose of landfill gas and reduce release of methane, a greenhouse gas, and odors into the atmosphere
Running Springs Water Dist	Essential Public Services	Running Springs	Sewage treatment plant	Improvements to sewage treatment plant for handling raw sewage
San Bernardino County Special Services	Essential Public Services	Devore Heights	Sewage treatment plant	Improvements to sewage treatment plant, addition of odor control system (odor scrubber) and emergency backup generator for use during power outages

RENEWABLE ENERGY PROJECTS, SEWAGE TREATMENT PLANTS, LANDFILLS & WATER SERVICE OPERATIONS				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project
South Orange County Wastewater Authority	Essential Public Services	Laguna Niguel	Sewage treatment plant	Improvements to sewage treatment plant, addition of odor control system (odor scrubber), boiler, and emergency backup generator for use during power outages
Sunshine Gas Producers LLC	Essential Public Services	Sylmar	Landfill	Installation of electrical generating units to use renewable landfill gas to produce electricity at sunshine canyon landfill
Tetra Tech Inc	Essential Public Services	Carson	Landfill	Control system (flare) to dispose of landfill gas and reduce release of methane, a greenhouse gas, and odors into the atmosphere
USA Waste Of California	Essential Public Services	Corona	Landfill	Control system (flare) to dispose of landfill gas to minimize odors and reduce release of methane, a greenhouse gas, and odors into the atmosphere
Valley Sanitary District	Essential Public Services	Indio	Sewage treatment plant	Improvements to sewage treatment plant
West Basin Municipal Water District	Essential Public Services	El Segundo	Water treatment plant	Treatment system for reclaimed water
Yucaipa Valley Water District	Essential Public Services	Yucaipa	Sewage treatment plant	Improvements to sewage treatment plant

POLICE, FIRE PROTECTION & SCHOOLS				
Facility Name	Facility Type	Project Location	Facility Operation	Proposed Project
Anaheim City, Police Dept	Essential Public Services	Anaheim	Police Facility	Modification of existing gasoline dispensing facility to comply with state law and to increase throughput
Cal State University, Dominguez Hills	Essential Public Services	Carson	School	Installing trigeneration plant for electrical generation, heating and cooling at the university
Crafton Hills College	Essential Public Services	Yucaipa	School	Installing two boilers to provide additional heat capacity for students and staff
La County, Fire Dept - Forest & Fire Warden	Essential Public Services	Pacoima	Fire Station	Installing control system (spray booth) for coating operations for carpentry shop used by the fire department
La Unified School District, Woodrow Wilson High	Essential Public Services	Los Angeles	School	Installing three boilers to provide additional heating capacity for students and staff
Rio Hondo Community College	Essential Public Services	Whittier	School	Installing two boilers to provide additional heat capacity for students and staff

Declarations Submitted by Permit Holders Regarding the Effects of SCAQMD Permit Moratorium

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
EMISSION REDUCTION PROJECTS						
Ernie Bacon	Baker-Furnace, Inc	Control equipment manufacturer	Yorba Linda	Thermal oxidizers, ovens, afterburners, soil remediation	Air Quality: no emission reductions; Hydrology: potential adverse impacts to water quality and groundwater (without cleanup)	
Ken Barker	Sully-Miller Contracting Co.	Asphalt/aggregate manufacturer	Southern California	Control equipment; new facilities (reducing distance to transport aggregate)	Air Quality: no emission reductions; increase in diesel fuel emissions; Energy: reduction Transportation: traffic reduction (if less truck VMT)	
Stephen Bledsoe	California Construction and Industrial Materials Association	Cement/aggregate manufacturer	Southern California	Control equipment; new facilities (reducing distance to transport aggregate)	Air Quality: no emission reductions; increase in diesel fuel emissions; Energy: reduction Transportation: traffic reduction (if less truck VMT)	
Mark Christie	Mattivi Bros. Leasing Company	Asphalt rubber blending plant	Sun Valley	Blending equipment (replacing diesel powered equipment with natural gas or electric)	Air Quality: no emission reductions	

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
EMISSION REDUCTION PROJECTS						
John Engelhart	Resources Environmental LLC	Remediation services	Hawthorne	Soil vapor extraction and vapor treatment equipment; thermal/catalytic oxidizers	Air Quality: no emission reductions; Hydrology: potential adverse impacts to water quality and groundwater (without cleanup)	
Robert Freeman	LAX	Airport	Los Angeles	Boilers and turbines replacement	Air Quality: no NOx and GHG emission reductions; Energy: no gain in energy efficiency	
Torbjorn Helland	M.W. Sausse & Co.	Equipment manufacturer (steel)	Valencia	Spray booth replacement	Air Quality: no PM or VOC emission reductions	Use 1.5 gallons/day
Linda Holcomb	J.R. Sandavol Enterprises & Consulting	Spray booth manufacturer	Monrovia	Spray booths	Air Quality: no PM or VOC emission reductions (if spray booth not purchased)	
David Hummel	Lehigh Hanson	Cement/aggregate manufacturer	Southern California	Control equipment; new facilities (reducing distance to transport aggregate)	Air Quality: no emission reductions; increase in diesel fuel emissions; Energy: reduction Transportation: traffic reduction (if less truck VMT)	
Ian Hurlock-Jones	Fox Interactive Media, Inc.	Media services	Playa Vista	Emergency electrical generator	Public Services: safety concerns if no emergency power	

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
EMISSION REDUCTION PROJECTS						
Pat Kelly	Granite Construction Co.	Construction/ aggregate services	Indio	Control equipment; new facilities (reducing distance to transport aggregate)	Air Quality: no emission reductions; increase in diesel fuel emissions; Energy: reduction Transportation: traffic reduction (if less truck VMT)	
Michael Lewis	Construction Industry Air Quality Coalition	Construction services	West Covina	Emergency generators	Public Services: safety concerns if no emergency power	
Earl Mahan	Coast Booth Services	Spray booth repairer	Chino	Spray booths	Air Quality: potential increase in PM emissions (if spray booths are not repaired)	
William McKenna	Platinum Coachworks	Auto Body Shop	Covina	Spray booths (2)	Air Quality: no emission reduction	
Larry Padfield	U.S. Development Group, LLC	Ethanol unloading and distribution	Southern California	Rail car-to-truck unloading facility	Air Quality: no emission reduction; Transportation: no traffic reduction	15,000 140-mile RT truck trips reduced to 2-miles.
Michael Renwick	CRE Spray Booths & Metal Buildings	Auto Body Shops	Southern California	Spray booths	Air Quality: no PM or VOC emission reductions (if spray booth not permitted and used)	
Tony Royster	Department of General Services of City of Los Angeles	Maintenance facility	Los Angeles	Emergency generator for LNG fueling station	Air Quality: no emission reductions from replacing diesel vehicles with LNG/CNG powered vehicles	

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
EMISSION REDUCTION PROJECTS						
Henrik Scherer	Solar Turbines Inc.	Solar turbine manufacturer	San Diego	Solar turbines (to replace combustion turbines)	Air Quality: no NOx and PM10 emission reductions; Energy: no gain in energy efficiency	
Claudia Steiding	Riverside County Dept. of Facilities Mgmt	Communication facilities (3)	Riverside	3 generators	Public Services: lack of backup power could affect health and safety services	
Karma Thompson	Tesoro Refinery	Refinery	Los Angeles	Replace existing cogeneration units and boilers	Air Quality: no NOx emissions reductions	
Enrique Zaldivar	Dept of Public Works' Bureau of Sanitation for City of Los Angeles	Alternative fueling stations	Los Angeles	Emergency generator at LNG/CNG fueling facility	Air Quality: no emission reductions from replacing diesel vehicles with LNG/CNG powered vehicles	
MEDICAL AND HEALTH CARE PROJECTS						
Roger Richter	California Hospital Association	Hospital	25 hospitals throughout So. California	Emergency generator and boilers	Public/Emergency Services	

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
RENEWABLE ENERGY PROJECTS, SEWAGE TREATMENT PLANTS, LANDFILLS & WATER SERVICE OPERATIONS						
Gregory Adams	County Sanitation Districts of LA County	Landfill/Wastewater treatment/ Reclamation plants	Los Angeles County	Landfill gas to energy equipment; boilers; emergency standby generators	Air Quality: no NOx and GHG emission reductions; Energy: no gain in energy efficiency; Public Services: impact essential public services	
Shane Chapman	Metropolitan Water District of Southern California	Water treatment plants	Southern California	Emergency standby generators	Hydrology: water quality/supply concerns if no emergency power	
Stephen Galowitz	Ridgewood Renewable Power LLC	5 MW landfill gas to electric generating facility	Brea	30 MW turbine (fueled by landfill gas) to replace flaring	Air Quality: no NOx and GHG emission reductions; Energy: no gain in energy efficiency	
Robert Lawhn	Reliant Energy	Electric generating facility	Rancho Cucamonga	Installing efficient electric generating equipment	Energy: no energy efficiency gains	
Joseph McCann	Riverside County Waste Management Dept	Landfills (39)	Moreno Valley	Landfill gas to energy projects (avoiding use of flares)	Air Quality: no NOx and GHG emission reductions; Energy: no gain in energy efficiency	

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
RENEWABLE ENERGY PROJECTS, SEWAGE TREATMENT PLANTS, LANDFILLS & WATER SERVICE OPERATIONS						
Anthony Pack	Eastern Municipal Water District	Wastewater collection and treatment facility	Perris	Pumps, emergency engines, scrubber, waste gas flare, boilers, blowers, fuel cells and dryers with control equipment	Hydrology and Water Quality: without updated infrastructure, potential adverse water quality and supply impacts	
Martin Ryan	Bowerman Power LFG	Landfill renewable energy	Irvine	20 MW electric generation facility (fueled by landfill gas) to replace flaring	Air Quality: no NOx and GHG emission reductions; Energy: no gain in energy efficiency	
Ed Torres	Orange County Sanitation District	Wastewater treatment plants	Fountain Valley; Huntington Beach	Infrastructure/ modifications	Public services – school, hospitals	
Enrique Zaldivar	Dept of Public Works' Bureau of Sanitation for City of Los Angeles	Wastewater treatment plants	Los Angeles (Playa del Rey)	60 MW cogeneration system (to replace flaring digester gas)	Air Quality: no NOx and GHG emissions reductions; Aesthetics: flare remains; no improvement	

Contact Name	Company Name	Affected Facility Type	Location	Project - Affected Equipment	Environmental Impact	Quantification Analysis of Impact
POLICE, FIRE PROTECTION & SCHOOLS						
Joseph Mehula	LAUSD	Schools	Los Angeles	Operating equipment	Public Services: schools	
Thomas Robinson	City of La Mirada	Fire Station	La Mirada	Emergency generator	Public/Emergency Services	
Willem Van der Pol	California State University, Fullerton	School	Fullerton	4.5 MW trigeneration facility	Energy; Public services (schools)	

SCAQMD Permit Applications (1,178) Affected by the Permit Moratorium Pursuant to Rules 1304 and 1309.1

Facility Type	Facility Location	Equipment Description
Aerospace	Monrovia	Oven, Drying
Aerospace	Monrovia	Oven, Drying
Aerospace	Los Angeles	Tank, Plating (Other)
Aerospace	Los Angeles	Tank, Plating (Other)
Aerospace	Manhattan Beach	Solder Leveling
Aerospace	Carson	Abrasive Blasting (Cabinet/Machine/Room)
Aerospace	Carson	Abrasive Blasting (Cabinet/Machine/Room)
Aggregate Industry	Irwindale	Aggregate Products/Crush >= 5000 tons per day (tpd)
Aggregate Industry	Rialto	Aggregate Crushing (<5000 tpd)
Aggregate Industry	Rialto	Asphalt Blending/Batching Equipment
Aggregate Industry	Cabazon	Aggregate Products/Crush >= 5000 tpd
Aggregate Industry	Riverside	Aggregate Products/Crushing (<5000 tpd)
Asphalt Operation	Irwindale	Asphalt Blending/Batching Equipment
Auto Body Shop	Rialto	Spray Booth, Automotive
Auto Body Shop	Van Nuys	Spray Booth, Automotive
Auto Body Shop	El Monte	Spray Booth Automotive
Auto Body Shop	Rubidoux	Spray Booth, Automotive
Auto Body Shop	Santa Ana	Spray Booth, Automotive
Auto Body Shop	La Habra	Spray Booth, Automotive
Auto Body Shop	Sun Valley	Spray Booth Paint And Solvent
Auto Body Shop	Riverside	Spray Booth, Automotive

Facility Type	Facility Location	Equipment Description
Auto Body Shop	Torrance	Spray Booth, Automotive
Auto Body Shop	Sun Valley	Spray Booth, Automotive
Auto Body Shop	La Puente	Spray Booth, Automotive
Auto Body Shop	Huntington Park	Spray Booth, Automotive
Auto Body Shop	Long Beach	Spray Booth, Automotive
Auto Body Shop	Fullerton	Spray Booth, Automotive
Auto Body Shop	Tujunga	Spray Booth, Automotive
Auto Body Shop	Stanton	Spray Booth, Automotive
Auto Body Shop	Stanton	Spray Booth, Automotive
Auto Body Shop	Costa Mesa	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth Paint And Solvent
Auto Body Shop	Wilmington	Spray Booth, Automotive
Auto Body Shop	Van Nuys	Spray Booth, Automotive
Auto Body Shop	Hawaiian Gardens	Spray Booth, Automotive
Auto Body Shop	Tarzana	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	Paramount	Spray Booth/Enclosure, Powder Coating System
Auto Body Shop	Paramount	Oven, Powder Coating
Auto Body Shop	Paramount	Spray Booth/Enclosure, Powder Coating System
Auto Body Shop	Paramount	Oven, Powder Coating
Auto Body Shop	Sun Valley	Spray Booth, Automotive
Auto Body Shop	Santa Ana	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth, Automotive

Facility Type	Facility Location	Equipment Description
Auto Body Shop	Torrance	Spray Booth, Automotive
Auto Body Shop	Riverside	Spray Booth, Automotive
Auto Body Shop	North Hollywood	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	Huntington Park	Spray Booth Paint & Solvent
Auto Body Shop	Montebello	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	Norco	Spray Booth, Automotive
Auto Body Shop	Arcadia	Spray Booth
Auto Body Shop	Arcadia	Spray Booth
Auto Body Shop	South Gate	Spray Booth, Automotive
Auto Body Shop	South Gate	Spray Booth, Automotive
Auto Body Shop	North Hollywood	Spray Booth, Automotive
Auto Body Shop	Van Nuys	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth
Auto Body Shop	South El Monte	Spray Booth, Automotive
Auto Body Shop	Fontana	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	El Monte	Spray Booth Paint And Solvent
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	Lake Elsinore	Spray Booth, Automotive
Auto Body Shop	Banning	Spray Booth, Automotive
Auto Body Shop	Stanton	Spray Booth, Automotive

Facility Type	Facility Location	Equipment Description
Auto Body Shop	South El Monte	Spray Booth, Automotive
Auto Body Shop	Fullerton	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spraybooth Automotive
Auto Body Shop	San Clemente	Spray Booth, Automotive
Auto Body Shop	Temecula	Spray Booth, Automotive
Auto Body Shop	Van Nuys	Perp. Station
Auto Body Shop	Lake Elsinore	Spray Booth, Automotive
Auto Body Shop	Lakewood	Spray Booth Paint And Solvent
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	Bloomington	Spray Booth Paint And Solvent
Auto Body Shop	North Hollywood	Spray Booth, Automotive
Auto Body Shop	Los Angeles	Spray Booth, Automotive
Auto Body Shop	Riverside	Spray Booth, Automotive
Auto Repair Shop	Montebello	Tire Buffer
Auto Repair Shop	Montebello	Tire Buffer
Auto Repair Shop	Van Nuys	Spray Booth, Automotive
Auto Repair Shop	Los Angeles	Spray Booth, Automotive
Auto Repair Shop	Los Angeles	Tire Buffer
Auto Repair Shop	Los Angeles	Tire Buffer
Auto Repair Shop	Fontana	Tire Buffer
Auto Repair Shop	Sylmar	Spray Booth, Automotive
Auto Repair Shop	Long Beach	Spray Booth Paint And Solvent
Auto Repair Shop	Murrieta	Spray Booth, Automotive

Facility Type	Facility Location	Equipment Description
Auto Sales	Fontana	I C E (>500 HP) Emergency Elec Gen Diesel
Brewery	Van Nuys	I C E (50-500 HP) Emergency Elec Gen-Diesel
Coating Operation	Fontana	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Fontana	Oven, Powder Coating]
Coating Operation	Anaheim	Spray Booth Paint And Solvent
Coating Operation	Anaheim	Spray Booth Paint And Solvent
Coating Operation	Westminster	Spray Booth Paint And Solvent
Coating Operation	Chino	Spray Booth Paint And Solvent
Coating Operation	San Fernando	Spray Booth(s) (1 - 5) w/ Afterburner
Coating Operation	San Fernando	Oven, Other
Coating Operation	North Hollywood	Spray Booth(s) (1 - 5) w/ Afterburner
Coating Operation	Montebello	Abrasive Blasting (Cabinet/Machine/Room)
Coating Operation	Montebello	Oven, Cooking Or Curing
Coating Operation	San Bernardino	Spray Booth Paint And Solvent
Coating Operation	San Bernardino	Spray Equipment Open
Coating Operation	Costa Mesa	Spray Booth Paint And Solvent
Coating Operation	North Hollywood	Spray Booth Styrenated Resins
Coating Operation	Hemet	Spray Booth Styrenated Resins
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending

Facility Type	Facility Location	Equipment Description
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation	North Hollywood	Paints Blending
Coating Operation		Spray Booth Paint & Solvent
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	Placentia	Spray Booth Paint And Solvent
Coating Operation	Gardena	Spray Booth Paint And Solvent
Coating Operation	Gardena	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Pomona	Spray Booth Paint And Solvent
Coating Operation	Pomona	Spray Booth Paint And Solvent
Coating Operation	Commerce	Spray Booth Paint And Solvent
Coating Operation	Commerce	Spray Booth Paint And Solvent
Coating Operation	Commerce	Oven, Drying
Coating Operation	Commerce	Oven, Drying
Coating Operation	Anaheim	Spray Booth Styrenated Resins
Coating Operation	Los Angeles	Spray Machine - Coating
Coating Operation	Chatsworth	Spray Booths (Multiple) With Multiple VOC Control Equipment
Coating Operation	Chatsworth	Oven, Powder Coating
Coating Operation	Chatsworth	Spray Machine - Coating
Coating Operation	Chatsworth	Spray Machine - Coating
Coating Operation	Chatsworth	Spray Machine - Coating

Facility Type	Facility Location	Equipment Description
Coating Operation	Los Angeles	Paints Blending
Coating Operation	Los Angeles	Paints Blending
Coating Operation	Los Angeles	Paints Blending
Coating Operation	Los Angeles	Paints Blending
Coating Operation	Los Angeles	Paints Blending
Coating Operation	Northridge	Spray Booth Paint And Solvent
Coating Operation	Valencia	Abrasive Blasting (Cabinet/Machine/Room)
Coating Operation	Santa Fe Springs	Spray Booth Paint And Solvent
Coating Operation	Anaheim	Spray Booth Paint And Solvent
Coating Operation	Sun Valley	Spray Booth Paint And Solvent
Coating Operation	Sun Valley	Oven, Drying
Coating Operation	Fontana	Spray Booth Paint And Solvent
Coating Operation	Fontana	Spray Booth Paint And Solvent
Coating Operation	Rancho Cucamonga	Spray Booth Paint And Solvent
Coating Operation	Rancho Cucamonga	Oven, Rubber Curing
Coating Operation	Torrance	Spray Booth Paint And Solvent
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	Pico Rivera	Spray Booth Paint And Solvent
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	Los Angeles	Oven, Powder Coating
Coating Operation	Los Angeles	Spray Booth/Enclosure, Powder Coating System
Coating Operation	N. Hollywood	Spray Booth
Coating Operation	N. Hollywood	Spray Booth

Facility Type	Facility Location	Equipment Description
Coating Operation	San Bernardino	Spray Booth Paint And Solvent
Coating Operation	Chatsworth	Paints Blending
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Spray Booth Paint And Solvent
Coating Operation	Long Beach	Mist Eliminator, HEPA Filter
Coating Operation	Long Beach	Tank, Surface Preparation - Other Acids
Coating Operation	Long Beach	Tank, Chromic Acid - Anodizing
Coating Operation	City Of Industry	Spray Booth Paint And Solvent
Coating Operation	Topanga	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	Monrovia	Spray Booth, Automotive
Coating Operation	North Hills	Oven, Powder Coating
Coating Operation	Fullerton	Oven, Powder Coating
Coating Operation	Fullerton	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Fountain Valley	Oven, Drying
Coating Operation	Fullerton	Tank, Sulfuric/Phosphoric Acid - Anodizing
Coating Operation	Riverside	Paints Blending
Coating Operation	Riverside	Paints Blending
Coating Operation	Riverside	Paints Blending

Facility Type	Facility Location	Equipment Description
Coating Operation	Riverside	Paints Blending
Coating Operation	Inglewood	Spray Booth Paint And Solvent
Coating Operation	Sun Valley	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Orange	Spray Booth Paint And Solvent
Coating Operation	Northridge	Spray Booth Paint And Solvent
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	La Verne	Spray Booth Paint And Solvent
Coating Operation	Los Angeles	Spray Booth Paint And Solvent
Coating Operation	Fontana	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Coating Operation	Fontana	Baghouse, Ambient Temp (>500 Sq Ft)
Coating Operation	Fontana	Baghouse, Ambient Temp (>500 Sq Ft)
Coating Operation	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Coating Operation	Costa Mesa	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Arcadia	Spray Booth Paint And Solvent
Coating Operation	Anaheim	Spray Booth Paint And Solvent
Coating Operation	Santa Fe Springs	Spray Booth Paint And Solvent
Coating Operation	Diamond Bar	Spray Equipment Open
Coating Operation	Valencia	Spray Booth Paint And Solvent
Coating Operation	Valencia	Oven, Other
Coating Operation	Valencia	Spray Booth Paint And Solvent
Coating Operation	Valencia	Spray Booth Paint And Solvent

Facility Type	Facility Location	Equipment Description
Coating Operation	Valencia	Spray Booth Paint And Solvent
Coating Operation	Panorama City	Spray Booth Paint And Solvent
Coating Operation	Corona	Spray Booth Paint And Solvent
Coating Operation	Corona	Spray Booth Other
Coating Operation	Corona	Oven, Drying
Coating Operation	Lynwood	Spray Booth Paint And Solvent
Coating Operation	Valencia	Spray Booth Paint And Solvent
Coating Operation	Van Nuys	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Van Nuys	Spray Booth/Enclosure, Powder Coating System
Coating Operation	Van Nuys	Oven, Powder Coating]
Coating Operation	Van Nuys	Baghouse, Ambient Temp (>500 Sq Ft)
Coating Operation	Van Nuys	Abrasive Blasting (Cabinet/Machine/Room)
Coating Operation	Van Nuys	Oven, Powder Coating
Communications	Pasadena	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Anaheim	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Irwindale	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Costa Mesa	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Riverside	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Commerce	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Anaheim	I C E (>500 HP) Emergency Elec Gen Diesel
Communications	Mission Hills	I C E (>500 HP) Emergency Elec Gen Diesel
Concrete Batch Plant	Ontario	Storage Silo Cement
Concrete Batch Plant	Ontario	Concrete Batch Equipment

Facility Type	Facility Location	Equipment Description
Concrete Batch Plant	Ontario	Baghouse, Ambient Temp (<=100 Sq Ft)
Concrete Batch Plant	Chino	Concrete Batch Equipment
Construction Services	Colton	Pigments Blending
Construction Services	Colton	Storage Silo Cement
Construction Services	Santa Ana	Storage Tank Cement
Construction Services	Santa Ana	Storage Tank Cement
Construction Services	Santa Ana	Storage Tank Cement
Construction Services	Santa Ana	Concrete Batch Equipment
Construction Services	City Of Industry	Misc Minerals Conveying
Construction Services	Fontana	Storage Tank Cement
Construction Services	Indio	Storage Tank Asphalt <=50,000 Gallons
Construction Services	Indio	Storage Tank Asphalt <=50,000 Gallons
Construction Services	Indio	Electrostatic Precip Lo Volt (<3000 cfm)
Construction Services	Riverside	Concrete Blending
Construction Services	Riverside	Concrete Blending
Construction Services	Riverside	Concrete Blending
Construction Services	Riverside	Concrete Blending
Construction Services	Riverside	Storage Silo Cement
Construction Services	Coachella	Misc Organic Chemicals Separation
Construction Services	Coachella	Misc Organic Chemicals Separation
Construction Services	Coachella	Afterburner (<1 Mmbtu/Hr, Venting S.S.)
Construction Services	Long Beach	I C E (50-500 Hp) N-Em Port N-Rent Diesel
Construction Services	Downey	Asphalt Blending/Batching Equipment

Facility Type	Facility Location	Equipment Description
Construction Services	Downey	Dry Filter (>500 Sq Ft)
Construction Services	Downey	Storage Tank, Asphalt >50,000 Gallons
Construction Services	Downey	Baghouse, Hot
Construction Services	Los Angeles	Pigments Blending
Construction Services	Los Angeles	Pigments Blending
Construction Services	Los Angeles	Dry Filter (>100-500 Sq Ft)
Construction Services	South Gate	Concrete Batch Equipment
Construction Services	South Gate	Storage Silo Cement
Construction Services	Signal Hill	I C E (50-500 HP) Diesel
Construction Services	Signal Hill	I C E (50-500 HP) Diesel
Construction Services	Diamond Bar	Scrubber, Other Venting M.S.
Construction Services	Diamond Bar	Scrubber, Other Venting M.S.
Construction Services	Long Beach	Cement Marine Loading & Unloading
Construction Services	Long Beach	Selective Catalytic Reduction
Construction Services	West Hollywood	I C E (>500 HP) Emergency Elec Gen Diesel
Construction Services	Fontana	Clay Size Reduction
Construction Services	Fontana	Clay Size Reduction
Construction Services	Fontana	Baghouse, Ambient Temp (>100-500 Sq Ft)
Construction Services	Diamond Bar	Tank Degassing Unit
Construction Services	Diamond Bar	Tank Degassing Unit
Construction Services	Diamond Bar	Scrubber, Other Chemical Venting S.S.
Construction Services	Diamond Bar	Scrubber, Other Chemical Venting S.S.
Construction Services	Wilmington	Sludge Dewatering

Facility Type	Facility Location	Equipment Description
Construction Services	Wilmington	Afterburner, Catalytic
Construction Services	Santa Ana	Concrete Batch Equipment
Construction Services	Fontana	Concrete Batch Equipment
Construction Services	Fontana	Baghouse, Ambient Temp (>100-500 Sq Ft)
Construction Services	Montclair	Baghouse, Ambient Temp (>500 Sq Ft)
Construction Services	Montclair	Concrete Batch Equipment
Construction Services	Montclair	Storage Silo Cement
Consulting	Long Beach	Odor Control Unit
Crematory	Sun Valley	Crematory Ovens
Crematory	Sun Valley	Crematory Ovens
Crematory	Sun Valley	Crematory Ovens
Crematory	Sun Valley	Crematory Ovens
Crematory	Sun Valley	Crematory Ovens
Crematory	Carson	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Crematory	Los Angeles	Crematory Ovens
Dry Cleaning	Chatsworth	Dry Cleaning Equip Petroleum Solvent
Dry Cleaning	Corona	Dry Cleaning, Dry-To-Dry Nv,w/ Sic,Perc
Dyeing Operations	Vernon	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Dyeing Operations	City Of Industry	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Dyeing Operations	Ontario	Dip Tank Coating Dye
Dyeing Operations	Los Angeles	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel

Facility Type	Facility Location	Equipment Description
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Desert Hot Springs	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Murrieta	Turbine Engine (<=50 MW) Nat Gas Only
Energy Generating Facility	Long Beach	Turbine Engine (>50 MW) El Peak Other Fuel
Energy Generating Facility	Long Beach	Turbine Engine (>50 MW) El Peak Other Fuel
Energy Generating Facility	Long Beach	Turbine Engine (>50 MW) El Peak Other Fuel
Energy Generating Facility	Long Beach	Turbine Engine (>50 MW) El Peak Other Fuel
Energy Generating Facility	Long Beach	Turbine Engine (>50 MW) El Peak Other Fuel
Energy Generating Facility	Long Beach	Turbine Engine (>50 MW) El Peak Other Fuel
Energy Generating Facility	Etiwanda	Turbine Engine (>50 MW) Nat Gas Only
Energy Generating Facility	Etiwanda	Selective Catalytic Reduction
Energy Generating Facility	Etiwanda	Turbine Engine (>50 MW) Nat Gas Only
Energy Generating Facility	Etiwanda	Selective Catalytic Reduction
Energy Generating Facility	Etiwanda	Boiler (>50 MMBTU/Hr) Nat Gas Only
Energy Generating Facility	Brea	Turbine Engine (<=50 MW) Landfill Gas
Energy Generating Facility	Brea	Turbine Engine (<=50 MW) Landfill Gas
Energy Generating Facility	Brea	Turbine Engine (<=50 MW) Landfill Gas
Energy Generating Facility	Brea	Turbine Engine (<=50 MW) Landfill Gas
Energy Generating Facility	Brea	Selective Catalytic Reduction

Facility Type	Facility Location	Equipment Description
Energy Generating Facility	Brea	Selective Catalytic Reduction
Energy Generating Facility	Brea	Selective Catalytic Reduction
Energy Generating Facility	Brea	Selective Catalytic Reduction
Energy Generating Facility	Brea	Landfill Gas Absorption
Energy Generating Facility	Brea	Flare, Open Landfill/Digester Gas
Energy Generating Facility	Brea	Storage Tank Ammonia
Energy Generating Facility	Romoland	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Romoland	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Romoland	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Romoland	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	Romoland	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	City Of Industry	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	City Of Industry	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	City Of Industry	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	City Of Industry	Turbine Engine (>50 MW) Other Fuel
Energy Generating Facility	City Of Industry	Turbine Engine (>50 MW) Other Fuel
Food Services	Huntington Beach	Plastic/Resin Size Reduction
Food Services	Huntington Beach	Plastic/Resin Size Reduction
Food Services	Huntington Beach	Plastic/Resin Size Reduction
Food Services	Santa Fe Springs	Abrasive Blasting (Cabinet/Machine/Room)
Food Services	Santa Fe Springs	Baghouse, Ambient Temp (<=100 Sq Ft)
Gas Plant	Long Beach	Gas Plant
Gas Plant	Long Beach	Gas Plant

Facility Type	Facility Location	Equipment Description
Gas Plant	Sylmar	Turbine Engine (<=50 MW) Landfill Gas
Gas Plant	Sylmar	Turbine Engine (<=50 MW) Landfill Gas
Gas Plant	Sylmar	Turbine Engine (<=50 MW) Landfill Gas
Gas Plant	Sylmar	Turbine Engine (<=50 MW) Landfill Gas
Gas Plant	Sylmar	Turbine Engine (<=50 MW) Landfill Gas
Gas Plant	Sylmar	Flare, Enclosed Landfill/Digester Gas
Gas Plant	Sylmar	Landfill Gas Treating
Gasoline Fueling And Dispensing	Van Nuys	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Anaheim	Service Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Long Beach	Service Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	South Gate	Service Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Hawthorne	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Castaic	Service Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Diamond Bar	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Diamond Bar	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Diamond Bar	Afterburner, Direct Flame
Gasoline Fueling And Dispensing	Diamond Bar	Tank Degassing Unit
Gasoline Fueling And Dispensing	Harbor City	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Diamond Bar	Serv Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Anaheim	Gasoline Dispensing
Gasoline Fueling And Dispensing	Los Angeles	Soil Treat Vapor Extract Other Voc Under

Facility Type	Facility Location	Equipment Description
Gasoline Fueling And Dispensing	Los Angeles	Serv Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Anaheim	Serv Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Calabasas	Soil Treat Vapor Extract Gasoline Under
Gasoline Fueling And Dispensing	Rialto	Serv Stat Storage & Dispensing Gasoline
Gasoline Fueling And Dispensing	Coachella	Soil Treat Vapor Extract Gasoline Under
Hotel	Santa Ana	Boiler (<5 MMBTU/Hr) Nat Gas Only
Hotel	Santa Ana	Boiler (<5 MMBTU /Hr) Nat Gas Only
Hotel	City Of Industry	Boiler (5-20 MMBTU /Hr) Nat Gas Only
Hotel	Rancho Palos Verdes	Boiler (5-20 MMBTU /Hr) Nat Gas Only
Hotel	Rancho Palos Verdes	Boiler (5-20 MMBTU /Hr) Nat Gas Only
Hotel	Rancho Palos Verdes	Boiler (5-20 MMBTU /Hr) Nat Gas Only
Landfill	Garden Grove	Landfill Gas Collection (10-50 Wells)
Landfill	Garden Grove	Landfill Gas Collection (10-50 Wells)
Landfill	Irvine	Landfill Gas Treating
Landfill	Irvine	Turbine Engine (<=50 MW) Landfill Gas
Landfill	Irvine	Turbine Engine (<=50 MW) Landfill Gas
Landfill	Irvine	Turbine Engine (<=50 MW) Landfill Gas
Landfill	Irvine	Turbine Engine (<=50 MW) Landfill Gas
Landfill	Irvine	Turbine Engine (<=50 MW) Landfill Gas
Landfill	Torrance	Landfill Gas Collection (>50 Wells)
Landfill	Torrance	Afterburner, Direct Flame
Landfill	Calabasas	Flare, Enclosed Landfill/Digester Gas
Landfill	West Covina	Boiler (>10 MMBTU /Hr) Landfill Gas

Facility Type	Facility Location	Equipment Description
Landfill	West Covina	Boiler (>10 MMBTU /Hr) Landfill Gas
Landfill	West Covina	Turbine Engine (<=50 MW) Landfill Gas
Landfill	Thousand Palms	Landfill Condensate/Leaching/Collection
Landfill	Moreno Valley	Flare, Enclosed Landfill/Digester Gas
Landfill	Rubidoux	Flare, Open Landfill/Digester Gas
Landfill	Carson	Flare, Enclosed Landfill/Digester Gas
Landfill	Corona	Flare
Landscaping	Carson	I C E (>500 HP) Non-Emergency Port N-Rent Diesel
Landscaping	La Habra	I C E (50-500 HP) Non-Emergency Stat Oil Only
Landscaping	Gardena	I C E (50-500 HP) Non-Emergency Port N-Rent Gasoline
Library	San Marino	I C E (>500 HP) Non-Emergency Port N-Rent Diesel
Manufacturer - Aerosol	Anaheim	Storage Tank LPG
Manufacturer - Battery	Santa Fe Springs	Battery Manufacturing
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending

Facility Type	Facility Location	Equipment Description
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Misc Organic Material Blending
Manufacturer - Car Care Products	Duarte	Storage Tank Methanol
Manufacturer - Car Care Products	Duarte	Storage Tank Ketones
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>100-500 Sq Ft)
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>100-500 Sq Ft)
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>100-500 Sq Ft)
Manufacturer - Catalysts	Signal Hill	Catalyst Size Classification
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Catalysts	Signal Hill	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Catalysts	Wilmington	I C E (>500 HP) Nat Gas
Manufacturer - Catalysts	Wilmington	Selective Catalytic Reduction
Manufacturer - Ceramics	Costa Mesa	Spray Booth Paint And Solvent
Manufacturer - Cosmetics	Chatsworth	Cosmetics Blending
Manufacturer - Cosmetics	Chatsworth	Cosmetics Blending
Manufacturer - Cosmetics	Chatsworth	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending

Facility Type	Facility Location	Equipment Description
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Cosmetics Blending
Manufacturer - Cosmetics	Los Angeles	Baghouse, Ambient Temp (<=100 Sq Ft)
Manufacturer - Cosmetics	Los Angeles	Plastic/Resin Size Reduction
Manufacturer - Cosmetics	North Hollywood	Cosmetics Blending
Manufacturer - Cosmetics	North Hollywood	Cosmetics Blending
Manufacturer - Cosmetics	North Hollywood	Cosmetics Blending
Manufacturer - Electronic Component	Vernon	Spray Booth Paint And Solvent
Manufacturer - Electronic Component	Commerce	Rollercoater
Manufacturer - Electronic Component	North Hollywood	Oven, Other
Manufacturer - Electronic Components	Chatsworth	Circuit Board Etchers, Ammonia
Manufacturer - Electronic Components	Sylmar	Electrostatic Precip Hi Volt (>=3000cfm)

Facility Type	Facility Location	Equipment Description
Manufacturer - Electronic Components	Sylmar	Misc Materials Production
Manufacturer - Electronic Components	Orange	Misc Stripping Tank
Manufacturer - Electronic Components	Orange	Tank, Precious Metal - Plating
Manufacturer - Electronic Components	Orange	Tank, Plating (Other)
Manufacturer - Electronic Components	Orange	Tanks, Nickel Plating Line
Manufacturer - Electronic Components	Orange	Tank, Plating (Other)
Manufacturer - Electronic Components	Orange	Tank, Other Aqueous Solution
Manufacturer - Electronic Components	Santa Ana	Tank, Other Aqueous Solution
Manufacturer - Engines	Irvine	Jet Engine Test Facility Other Fuel
Manufacturer - Foam Products	Ontario	Oven, Other
Manufacturer - Foam Products	Ontario	Oven, Other
Manufacturer - Foam Products	Ontario	Oven, Other
Manufacturer - Food Product	Buena Park	Boiler (<5 MMBTU/Hr) Nat Gas Only
Manufacturer - Food Product	Montebello	Storage Silo Flour
Manufacturer - Food Product	Montebello	Storage Silo Flour
Manufacturer - Food Product	Mira Loma	Deep Fat Fryer
Manufacturer - Food Product	Mira Loma	Deep Fat Fryer
Manufacturer - Food Product	Mira Loma	I C E (50-500 HP) Emergency Elec Gen-Diesel
Manufacturer - Food Product	Mira Loma	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Manufacturer - Food Product	Torrance	Coffee Roasting, >= 100 lbs. Capacity
Manufacturer - Food Product	Torrance	Afterburner, Catalytic
Manufacturer - Food Product	Torrance	Coffee Roasting, >= 100 lbs. Capacity
Manufacturer - Food Product	Torrance	Afterburner, Catalytic

Facility Type	Facility Location	Equipment Description
Manufacturer - Food Product	San Clemente	Misc Materials Separation
Manufacturer - Food Product	San Clemente	Spray Equipment Open
Manufacturer - Food Product	San Clemente	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Food Product	San Clemente	Miscellaneous Distillation
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Misc Materials Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	San Clemente	Organic Chemicals Misc Blending
Manufacturer - Food Product	Yorba Linda	Boiler (5-20 MMBTU/Hr) Nat Gas Only P/P
Manufacturer - Food Product	Rancho Cucamonga	Storage Tank Corn Products
Manufacturer - Food Product	Rancho Cucamonga	Storage Tank Corn Products
Manufacturer - Food Product	Rancho Cucamonga	Storage Tank Corn Products
Manufacturer - Food Product	Rancho Cucamonga	Storage Tank Corn Products
Manufacturer - Food Product	Rancho Cucamonga	Storage Tank Corn Products
Manufacturer - Food Product	Rancho Cucamonga	Storage Tank Corn Products
Manufacturer - Food Product	Fontana	Boiler (<5 Mmbtu/Hr) Nat Gas Only
Manufacturer - Food Product	Los Angeles	Oven Bakery
Manufacturer - Food Product	Costa Mesa	Coffee Roasting (50-90 lbs Capacity)
Manufacturer - Food Product	Costa Mesa	Afterburner (<1 MMBTU/Hr, Venting S.S.)

Facility Type	Facility Location	Equipment Description
Manufacturer - Food Product	Van Nuys	Oven Bakery
Manufacturer - Food Product	Van Nuys	Oven Bakery
Manufacturer - Food Product	Azusa	Oven Bakery
Manufacturer - Food Product	Irvine	Deep-Fat Fryer Vegetable Oils
Manufacturer - Food Product	Irvine	Deep-Fat Fryer Vegetable Oils
Manufacturer - Food Product	Irvine	Feed And Food Misc Production
Manufacturer - Food Product	Irvine	Feed And Food Misc Blending
Manufacturer - Food Product	Anaheim	Food Processing-Grinding, Blending, Packaging, Convey, Flavoring
Manufacturer - Food Product	Anaheim	Dry Filter (<=100 Sq Ft)
Manufacturer - Food Product	Anaheim	Dry Filter (<=100 Sq Ft)
Manufacturer - Food Product	Anaheim	Dry Filter (<=100 Sq Ft)
Manufacturer - Food Product	Anaheim	Dust Collector Cartridge Type
Manufacturer - Food Product	Anaheim	Afterburner, Catalytic
Manufacturer - Food Product	Panorama City	Afterburner, Direct Flame
Manufacturer - Food Product	Panorama City	Deep Fat Fryer
Manufacturer - Food Product	Panorama City	Deep Fat Fryer
Manufacturer - Food Product	Panorama City	Afterburner, Direct Flame
Manufacturer - Food Product	Panorama City	Oven, Baking
Manufacturer - Food Product	Panorama City	Oven, Baking
Manufacturer - Food Product	Panorama City	Baghouse, Ambient Temp (>100-500 Sq Ft)
Manufacturer - Food Product	Panorama City	Storage Silo Flour
Manufacturer - Food Product	Panorama City	Baghouse, Ambient Temp (>100-500 Sq Ft)

Facility Type	Facility Location	Equipment Description
Manufacturer - Food Product	Panorama City	Storage Silo Flour
Manufacturer - Food Product	Los Angeles	I C E (50-500 HP) Emergency Elec Gen-Diesel
Manufacturer - Food Product	Carson	I C E (>500 HP) Emergency Elec Gen Diesel
Manufacturer - Food Product	Vernon	Deep Fat Fry Other Feed And Food
Manufacturer - Food Product	Vernon	Deep Fat Fry Other Feed And Food
Manufacturer - Food Product	Vernon	Deep Fat Fry Other Feed And Food
Manufacturer - Food Product	Vernon	Deep Fat Fry Other Feed And Food
Manufacturer - Food Product	Azusa	Boiler (5-20 MMBTU/Hr) Nat Gas Only P/P
Manufacturer - Food Product	Riverside	Deep Fat Fryer
Manufacturer - Food Product	Riverside	Meat Products, React-Deep Fat Fry
Manufacturer - Food Product	Riverside	Electrostatic Precip Hi Volt (>=3000cfm)
Manufacturer - Food Product	Riverside	Electrostatic Precip Hi Volt (>=3000cfm)
Manufacturer - Food Product	Cerritos	Food Processing-Grinding,Blending,Packaging, Convey,Flavoring
Manufacturer - Food Product	La Habra	Oven Bakery
Manufacturer - Food Product	La Habra	Afterburner - Catalytic For Bakery Oven
Manufacturer - Food Product	Rancho Dominguez	Nut Roaster
Manufacturer - Food Product	Rancho Dominguez	Nut Roaster
Manufacturer - Food Product	Rancho Dominguez	Nut Roaster
Manufacturer - Food Product	Riverside	Deep Fat Fryer
Manufacturer - Food Product	Riverside	Electrostatic Precipitator
Manufacturer - Food Product	Riverside	Deep Fat Fryer
Manufacturer - Food Product	Riverside	Electrostatic Precipitator
Manufacturer - Food Services	Vernon	I C E (>500 HP) Emergency Elec Gen Diesel

Facility Type	Facility Location	Equipment Description
Manufacturer - Fountains	Sun Valley	Laser Cutter
Manufacturer - Furniture	Lynwood	Spray Booth Paint And Solvent
Manufacturer - Furniture	Santa Fe Springs	Spray Booth
Manufacturer - Furniture	Santa Fe Springs	Spray Booth
Manufacturer - Furniture	Santa Fe Springs	Flowcoater
Manufacturer - Industrial Vehicles	Anaheim	Baghouse, Ambient Temp (>100-500 Sq Ft)
Manufacturer - Industrial Vehicles	Anaheim	Baghouse, Ambient Temp (>100-500 Sq Ft)
Manufacturer - Industrial Vehicles	Anaheim	Laser Cutter
Manufacturer - Industrial Vehicles	Anaheim	Laser Cutter
Manufacturer - Lawn/Garden Products	Los Angeles	Synthetic Fertilizer Production
Manufacturer - Lawn/Garden Products	Los Angeles	Natural Fertilizer Packaging/Processing
Manufacturer - Lawn/Garden Products	Los Angeles	Natural Fertilizer Packaging/Processing
Manufacturer - Lawn/Garden Products	Los Angeles	Synthetic Fertilizer Blending
Manufacturer - Lawn/Garden Products	Los Angeles	Synthetic Fertilizer Blending
Manufacturer - Lawn/Garden Products	Los Angeles	Storage Tank Synthetic Fertilizer
Manufacturer - Lawn/Garden Products	Los Angeles	Synthetic Fertilizer Conveying
Manufacturer - Lawn/Garden Products	Los Angeles	Natural Fertilizer Packaging/Processing
Manufacturer - Merchandise	Foothill Ranch	Spray Booth(s) w/ Carbon Adsorber (Regenerative)
Manufacturer - Merchandise	Foothill Ranch	Afterburner, Direct Flame
Manufacturer - Merchandise	Foothill Ranch	Flowcoater
Manufacturer - Merchandise	Foothill Ranch	Oven, Drying
Manufacturer - Merchandise	Foothill Ranch	Dip Tank (<=3 Gal/Day) Misc
Manufacturer - Merchandise	Foothill Ranch	Dip Tank (<=3 Gal/Day) Misc

Facility Type	Facility Location	Equipment Description
Manufacturer - Merchandise	Foothill Ranch	Oven, Drying
Manufacturer - Merchandise	Foothill Ranch	Dip Tank (<=3 Gal/Day) Misc
Manufacturer - Merchandise	Foothill Ranch	Oven, Drying
Manufacturer - Merchandise	Foothill Ranch	Dip Tank (<=3 Gal/Day) Misc
Manufacturer - Metal Products	Valencia	Laser Cutter
Manufacturer - Metal Products	Van Nuys	Furnace Reverb Aluminum
Manufacturer - Metal Products	Van Nuys	Furnace Reverb Aluminum
Manufacturer - Metal Products	Van Nuys	Furnace Reverb Aluminum
Manufacturer - Metal Products	Van Nuys	Baghouse, Hot
Manufacturer - Metal Products	Fontana	Furnace Other Met Ops Aluminum
Manufacturer - Metal Products	Fontana	Heat Treating Furnace
Manufacturer - Mirrors	Carson	Regenerative Oxidizer
Manufacturer - Optics	Valencia	Flowcoater
Manufacturer - Pillows	Vernon	Polyester Blending
Manufacturer - Piping	Fontana	Plasma Arc Cutting
Manufacturer - Piping	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Manufacturer - Piping	Fontana	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Piping	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Manufacturer - Piping	Fontana	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Piping	Fontana	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Piping	Fontana	Spray Equipment Open
Manufacturer - Piping	Fontana	Spray Equipment Open
Manufacturer - Piping	Fontana	Abrasive Blasting (Cabinet/Machine/Room)

Facility Type	Facility Location	Equipment Description
Manufacturer - Piping	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Manufacturer - Piping	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Manufacturer - Piping	Fontana	Abrasive Blasting (Cabinet/Machine/Room)
Manufacturer - Piping	Fontana	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Piping	Ontario	Boiler (<5 MMBTU/Hr) Oil Only
Manufacturer - Piping	Ontario	Boiler (<5 MMBTU /Hr) Oil Only
Manufacturer - Piping	Ontario	Boiler (<5 MMBTU /Hr) Oil Only
Manufacturer - Piping	Ontario	Boiler (<5 MMBTU /Hr) Oil Only
Manufacturer - Piping	Ontario	Boiler (<5 MMBTU /Hr) Oil Only
Manufacturer - Piping	Vernon	Rubber Roll Mill
Manufacturer - Piping	Vernon	Rubber Roll Mill
Manufacturer - Piping	Vernon	Rubber Roll Mill
Manufacturer - Piping	Vernon	Rubber Roll Mill
Manufacturer - Piping	Vernon	Miscellaneous Machining
Manufacturer - Piping	Vernon	Miscellaneous Machining
Manufacturer - Piping	Vernon	Miscellaneous Machining
Manufacturer - Piping	Vernon	Miscellaneous Machining
Manufacturer - Plastics	San Fernando	Plastics And Resins Molding
Manufacturer - Plastics	Santa Fe Springs	Misc Materials Blending
Manufacturer - Plastics	Santa Fe Springs	Misc Materials Blending
Manufacturer - Plastics	Glendale	Foams, Plastic, & Rubber Packaging
Manufacturer - Plastics	Chatsworth	Plastics And Resins Molding
Manufacturer - Plastics	Chatsworth	Plastic/Resin Size Reduction

Facility Type	Facility Location	Equipment Description
Manufacturer - Plastics	Chatsworth	Plastic/Resin Size Reduction
Manufacturer - Plastics, Steel	Riverside	Regenerative Oxidizer
Manufacturer - Propane	Pasadena	Storage Tank LPG
Manufacturer - Propane	Pasadena	Storage Tank LPG
Manufacturer - Rubber	Brea	Oven, Rubber Curing
Manufacturer - Rubber	Ontario	Natural Rubber Size Reduction
Manufacturer - Rubber	Ontario	Cyclone
Manufacturer - Rubber	Orange	Oven, Rubber Curing
Manufacturer - Rubber	Orange	Oven, Rubber Curing
Manufacturer - Sealing Product	Fullerton	Adhesives Melting
Manufacturer - Silicone	Santa Fe Springs	Oven, Cooking Or Curing
Manufacturer - Steel	Lynwood	Baghouse, Ambient Temp (>500 Sq Ft)
Manufacturer - Steel	Santa Fe Springs	Abrasive Blasting (Cabinet/Machine/Room)
Manufacturer - Steel	Santa Fe Springs	Plasma Arc Cutting
Manufacturer - Steel	Santa Fe Springs	Plasma Arc Cutting
Manufacturer - Steel	Santa Fe Springs	Dust Collector Cartridge Type
Manufacturer - Vending Machines	Pacoima	Laser Cutter
Marine Operations	San Pedro	Tank Degassing, Underground, Other
Marine Operations	San Pedro	Unspecified Equip/Process (schedule D in Rule 301)
Marine Operations	Wilmington	I C E (50-500 HP) Emergency Elec Gen-Diesel
Marine Operations	Terminal Island	Marine Bulk Ldng/Unldng Sys., Crude Oil
Marine Operations	Terminal Island	Afterburner, Direct Flame
Marine Operations	San Pedro	Afterburner, Direct Flame

Facility Type	Facility Location	Equipment Description
Medical Services	Temecula	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Medical Services	Temecula	Boiler (5-20 MMBTU /Hr) Nat Gas Only
Medical Services	Temecula	Boiler (5-20 MMBTU /Hr) Nat Gas Only
Medical Services	Westminster	Soil Treat Vapor Extract Other Voc Under
Medical Services	Irvine	Turbine Engine (<=50 MW) Nat Gas Only
Medical Services	Irvine	Turbine Engine (<=50 MW) Nat Gas & Other Oil
Medical Services	Irvine	Selective Catalytic Reduction
Medical Services	Redondo Beach	Boiler (<5 MMBTU /Hr) Nat Gas Only
Medical Services	Redondo Beach	Boiler (<5 MMBTU /Hr) Nat Gas Only
Medical Services	Redondo Beach	Boiler (<5 MMBTU /Hr) Nat Gas Only
Medical Services	Brea	Evaporator, Toxics
Medical Services	Brea	Evaporator, Toxics
Medical Services	Brea	Evaporator, Toxics
Medical Services	Brea	Evaporator, Toxics
Medical Services	Los Angeles	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Los Angeles	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Los Angeles	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Los Angeles	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Glendale	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Glendale	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Glendale	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Ontario	Boiler (>20-50 MMBTU/Hr) Nat Gas Only
Medical Services	Ontario	I C E (>500 HP) Emergency Elec Gen Diesel

Facility Type	Facility Location	Equipment Description
Medical Services	Long Beach	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Long Beach	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Carson	Healthcare Equipment
Medical Services	Carson	Healthcare Equipment
Medical Services	Carson	Healthcare Equipment
Medical Services	Carson	Healthcare Equipment
Medical Services	Rancho Cucamonga	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Hemet	I C E (>500 HP) Emergency Elec Gen Diesel
Medical Services	Lake Forest	Unspecified Equip/Process (schedule C in Rule 301)
Medical Services	El Segundo	Heater/Furnace (<5 MMBTU/Hr) Nat Gas & Misc
Medical Services	El Segundo	Heater/Furnace (5-20 MMBTU/Hr) Nat Gas & Misc
Metallurgical Services	Los Angeles	Storage Tank Ammonia
Metallurgical Services	Santa Fe Springs	Heat Treating Furnace
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Paramount	Drop Forge
Metallurgical Services	Compton	Tank, Nitric Acid
Metallurgical Services	Huntington Park	Foundry Sand Mold, Cold Forming Process
Metallurgical Services	Lake Forest	Furnace Elect Ind & Res Aluminum
Metallurgical Services	Lake Forest	Dust Collector/HEPA Filter, Other R-1401 Toxics

Facility Type	Facility Location	Equipment Description
Metallurgical Services	Lake Forest	Furnace Elect Ind & Res Aluminum
Metallurgical Services	Santa Ana	Mesh Pad, Other Acid Mists
Metallurgical Services	Santa Ana	Mesh Pad, Other Acid Mists
Metallurgical Services	Santa Ana	Tank Chrome Plating Hexavalent
Metallurgical Services	Santa Ana	Tank Chrome Plating Hexavalent
Metallurgical Services	Santa Fe Springs	Misc Minerals Size Classification
Metallurgical Services	Monrovia	Oven, Drying
Metallurgical Services	North Hollywood	Laser Cutter
Metallurgical Services	North Hollywood	Laser Cutter
Metallurgical Services	North Hollywood	Laser Cutter
Metallurgical Services	North Hollywood	Laser Cutter
Motion Picture Industry	Los Angeles	Film Cleaning Machine
Office	Los Angeles	I C E (50-500 HP) Emergency Elec Gen-Diesel
Office	Los Angeles	I C E (50-500 HP) Emergency Elec Gen-Diesel
Petroleum Operation	Huntington Beach	Crude Oil/Gas/Water Sep System (>5 tanks)
Petroleum Operation	Huntington Beach	Vapor Recovery Unit Compress & Condense
Petroleum Operation	Huntington Beach	Crude Oil/Gas/Water Sep System (>5 tanks)
Petroleum Operation	Bellflower	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Gardena	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	La Canada	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Carson	Turbine Engine (>50 Mw) N G & Misc
Petroleum Operation	Carson	Selective Catalytic Reduction
Petroleum Operation	Carson	Storage Tank w/ External Floating Roof Crude

Facility Type	Facility Location	Equipment Description
Petroleum Operation	Carson	Storage Tank w/ External Floating Roof Crude
Petroleum Operation	Carson	Storage Tank w/ External Floating Roof Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Santa Monica	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Brea	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Inglewood	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	El Segundo	Turbine Engine (<=50 MW) Nat & Proc Gas
Petroleum Operation	El Segundo	Selective Catalytic Reduction
Petroleum Operation	El Segundo	Turbine Engine (<=50 MW) Nat & Proc Gas
Petroleum Operation	El Segundo	Turbine Engine (<=50 MW) Nat & Proc Gas
Petroleum Operation	El Segundo	Boiler (>50 MMBTU/Hr) Process Gas
Petroleum Operation	Woodcrest	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Lakewood	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Signal Hill	Storage Contain, Baker-Type w/Ctl Crude
Petroleum Operation	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Cypress	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Wilmington	Marine Bulk Ldng/Unloadng Syste,, Crude Oil
Petroleum Operation	Carson	Soil Treat Vapor Extract Other Voc Under
Petroleum Operation	Carson	Bulk Load/Unload (>200,000 gal/day) Gasoline

Facility Type	Facility Location	Equipment Description
Petroleum Operation	Carson	Afterburner, Direct Flame
Petroleum Operation	Van Nuys	Storage Tank, Ethanol
Petroleum Operation	Van Nuys	Soil Treat Vapor Extract Other Voc Under
Petroleum Operation	Los Angeles	Soil Treat Vapor Extract Other Voc Under
Petroleum Operation	Long Beach	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Torrance	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Long Beach	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Riverside	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Hacienda Heights	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Santa Fe Springs	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Santa Fe Springs	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Santa Fe Springs	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Carson	Baghouse, Ambient Temp (>100-500 Sq Ft)
Petroleum Operation	Carson	Baghouse, Ambient Temp (>100-500 Sq Ft)
Petroleum Operation	Carson	Baghouse, Ambient Temp (>100-500 Sq Ft)
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude

Facility Type	Facility Location	Equipment Description
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Floater Crude
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Flt Gasoline
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Flt Gasoline
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Flt Gasoline
Petroleum Operation	Carson	Storage Tank Fx Rf w/ Internal Flt Gasoline
Petroleum Operation	Carson	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Santa Ana	Soil Treat Vapor Extract Other Voc Under
Petroleum Operation	Santa Fe Springs	Soil Treat Vapor Extract Other Voc Under
Petroleum Operation	Colton	Railroad Car Unload Hydrocarbons Misc
Petroleum Operation	Riverside	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	La Verne	Degreaser Other Solvent (>1 lb VOC/Day)
Petroleum Operation	La Verne	Degreaser Other Solvent (>1 lb VOC/Day)
Petroleum Operation	Palm Springs	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Paramount	I C E (>500 HP) Emergency Elec Gen Diesel
Petroleum Operation	Paramount	Tank Degassing Unit
Petroleum Operation	Inglewood	Soil Treat Vapor Extract Other VOC Under
Petroleum Operation	Diamond Bar	Soil Treat Vapor Extract Other VOC Under
Petroleum Operation	Bloomington	Alcohols Bulk Unloading

Facility Type	Facility Location	Equipment Description
Petroleum Operation	Bloomington	Storage Tank w/ External Float Roof Alcohols
Petroleum Operation	Bloomington	Storage Tank Fx Rf w/Internal Floater Crude
Petroleum Operation	Bloomington	Storage Tank Fx Rf w/Internal Floater Crude
Petroleum Operation	South Gate	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Carson	I C E (50-500 HP) Emergency Fire Fighting-Diesel
Petroleum Operation	Carson	I C E (50-500 HP) Non-Emergency Port Rent Diesel
Petroleum Operation	Inglewood	Soil Treat Vapor Extract Other Voc Under
Petroleum Operation	Wilmington	Storage Tank Ethanol
Petroleum Operation	Wilmington	Boiler (>50 MMBTU/Hr) Process Gas
Petroleum Operation	Wilmington	Selective Catalytic Reduction
Petroleum Operation	Wilmington	Selective Catalytic Reduction
Petroleum Operation	Wilmington	Boiler (>50 MMBTU /Hr) Process Gas
Petroleum Operation	Wilmington	Storage Tank Fx Rf w/Ctl Ammonia
Petroleum Operation	Wilmington	Turbine Engine (>50 MW) Other Comb Fuels
Petroleum Operation	Wilmington	Selective Catalytic Reduction
Petroleum Operation	Canoga Park	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Whittier	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Van Nuys	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Northridge	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Riverside	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Los Angeles	Soil Treat Vapor Extract Gasoline Under
Petroleum Operation	Long Beach	Heater/Furnace (<5 MMBTU /Hr) Other Fuel
Petroleum Operation	Long Beach	Heater/Furnace (<5 MMBTU /Hr) Other Fuel

Facility Type	Facility Location	Equipment Description
Petroleum Operation	Wilmington	Heater/Furnace (>50 MMBTU /Hr) Proc Gas
Petroleum Operation	Wilmington	Fuel Gas, Treating
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	Storage Tank Petroleum Middle Distillate
Petroleum Operation	Wilmington	I C E (50-500 HP) Emergency Fire Fighting-Diesel
Petroleum Operation	Wilmington	I C E (50-500 HP) Emergency Fire Fighting-Diesel
Petroleum Operation	La Habra Heights	Crude Oil/Gas/Water Separation >=400 barrels per day (bpd)
Petroleum Operation	Wilmington	Crude Oil/Gas/Water Separation >=400 bpd
Petroleum Operation	Wilmington	Waste Water Treating (>50000 gal/day)
Petroleum Operation	Wilmington	Heater/Furnace (<5 MMBTU/Hr) Other Fuel
Petroleum Operation	Wilmington	Flare, Other
Petroleum Operation	Wilmington	Flare, Other
Petroleum Operation	Wilmington	Bulk Load Tank Truck (1 Rack) Crude Oil
Petroleum Operation	Wilmington	Heater/Furnace (5-20 MMBTU /Hr) Other Fuel
Petroleum Operation	Wilmington	Gas Turbine-Dig. Gas/Ldf <300 kW
Petroleum Operation	Wilmington	Gas Turbine-Dig. Gas/Ldf <300 kW
Petroleum Operation	Wilmington	Gas Turbine-Dig. Gas/Ldf <300 kW
Petroleum Operation	Wilmington	Gas Turbine-Dig. Gas/Ldf <300 kW

Facility Type	Facility Location	Equipment Description
Petroleum Operation	Wilmington	Gas Turbine-Dig. Gas/Ldf <300 kW
Petroleum Operation	Wilmington	Gas Turbine-Dig. Gas/Ldf <300 kW
Petroleum Operation	Wilmington	Flare, Other
Petroleum Operation	Wilmington	Vapor Recovery Serving Crude Oil Production System
Petroleum Operation	Newhall	Boiler (5-20 MMBTU/Hr) Other Fuel
Petroleum Operation	Diamond Bar	Boiler (< 2 MMBTU /Hr) Oil Fired
Petroleum Operation	Terminal Island	Mobile Refuel Storage/Dispense Gasoline
Petroleum Operation	Terminal Island	Mobile Refuel Storage/Dispense Gasoline
Pharmaceuticals	Torrance	Oven, Drying
Pharmaceuticals	Torrance	Pharmaceuticals Blending
Pharmaceuticals	Tustin	Pharmaceuticals Blending
Pharmaceuticals	Corona	Pharmaceuticals Mfg.-Tableting, Coating, Vitamins, Herbs
Pharmaceuticals	Corona	Pharmaceuticals Mfg.-Tableting, Coating, Vitamins, Herbs
Pharmaceuticals	Corona	Pharmaceuticals Mfg.-Tableting, Coating, Vitamins, Herbs
Pharmaceuticals	Corona	Afterburner, Direct Flame
Pharmaceuticals	Corona	Pharmaceuticals Drying
Pharmaceutical	Irvine	I C E (>500 HP) Emergency Elec Gen Diesel
Pharmaceutical	Torrance	Pharmaceuticals, Reaction
Pharmaceutical	Torrance	Pharmaceuticals, Reaction
Pharmaceutical	Torrance	Pharmaceuticals, Reaction
Pharmaceutical	Torrance	Pharmaceuticals, Reaction
Pharmaceutical	Torrance	Pharmaceuticals, Reaction
Pharmaceutical	Torrance	Pharmaceuticals, Reaction

Facility Type	Facility Location	Equipment Description
Plating Facility	Compton	Abrasive Blasting (Cabinet/Machine/Room)
Plating Facility	Compton	Abrasive Blasting (Cabinet/Machine/Room)
Plating Facility	Compton	Baghouse, Ambient Temp (<=100 Sq Ft)
Plating Facility	Harbor City	Tank, Surface Preparation - Other Acids
Plating Facility	Harbor City	Scrubber, NOx, Single Stage
Postal Delivery	Fontana	I C E (>500 HP) Emergency Elec Gen Diesel
Power Supplier	Tustin	Soldering Machine
Printing	Irvine	Printing Press Flexographic Heat Set
Printing	Montebello	Printing Press Lithographic Air Dry
Printing	Garden Grove	Printing Press Lithographic Heat Set
Printing	Garden Grove	Regenerative Oxidizer
Printing	Burbank	Printing Press Misc Air Dry
Printing	Burbank	Printing Press Misc Air Dry
Printing	Burbank	Printing Press Misc Air Dry
Printing	Burbank	Printing Press Misc Air Dry
Printing	Commerce	Ink Manufacturing/Blending
Printing	Garden Grove	Oven, Screen Printing
Printing	Corona	Printing Press Flexographic Air Dry
Printing	Corona	Printing Press Flexographic Air Dry
Printing	Corona	Printing Press Flexographic Air Dry
Printing	Corona	Printing Press Flexographic Air Dry
Printing	Corona	Printing Press Flexographic Air Dry
Printing	Fontana	Spray Booth Paint And Solvent

Facility Type	Facility Location	Equipment Description
Printing	Fontana	Spray Booth Paint And Solvent
Printing	El Monte	Printing Press Lithographic Air Dry
Printing	El Monte	Printing Press Lithographic Air Dry
Printing	El Monte	Printing Press Lithographic Air Dry
Printing	El Monte	Printing Press Lithographic Air Dry
Printing	El Monte	Printing Press Lithographic Heat Set
Printing	El Monte	Afterburner, Direct Flame
Printing	Arcadia	Printing Press Lithographic Air Dry
Printing	Arcadia	Printing Press Lithographic Air Dry
Printing	Arcadia	Printing Press Lithographic Air Dry
Printing	Cerritos	Flexographic Printing Press, Ultraviolet (UV) Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Printing Press Flexographic Air Dry
Printing	City Of Industry	Lithographic Printing Press, Infared Dry
Printing	City Of Industry	Lithographic Printing Press, Infared Dry
Printing	Torrance	Flexographic Printing Press, UV Dry
Printing	Torrance	Flexographic Printing Press, UV Dry
Printing	Torrance	Flexographic Printing Press, UV Dry

Facility Type	Facility Location	Equipment Description
Printing	Torrance	Flexographic Printing Press, UV Dry
Printing	Rancho Cucamonga	Printing Press Lithographic Air Dry
Printing	Los Angeles	Printing Press Screen (All)
Printing	Los Angeles	Printing Press Screen (All)
Printing	Los Angeles	Printing Press Screen (All)
Printing	Los Alamitos	Printing Press Lithographic Heat Set
Printing	Los Alamitos	Printing Press Lithographic Heat Set
Printing	Los Alamitos	Printing Press Lithographic Heat Set
Printing	Los Alamitos	Afterburner, Direct Flame
Printing	Los Alamitos	Afterburner, Direct Flame
Printing	Los Alamitos	Dryer
Printing	Los Alamitos	Dryer
Printing	Los Alamitos	Dryer
Printing	Los Alamitos	Dryer
Printing	Los Alamitos	Dryer
Printing	Los Alamitos	Dryer
Printing	Fullerton	Lithographic Printing Press, UV Dry
Printing	Huntington Beach	Printing Press Lithographic Air Dry
Printing	Monterey Park	Printing Press Lithographic Air Dry
Public Services	Anaheim	Serv Stat Storage & Dispensing Gasoline
Public Services	Claremont	Boiler < 2 MM BTU/Hr Oil-Fired Diesel
Public Services	Claremont	I C E (50-500 HP) Emergency Elec Gen-Diesel
Public Services	Claremont	I C E (50-500 HP) Emergency Elec Gen-Diesel

Facility Type	Facility Location	Equipment Description
Public Services	Claremont	I C E (>500 HP) Emergency Elec Gen Diesel
Public Services	Los Angeles	I C E (50-500 HP) Emergency Elec Gen-Diesel
Public Services	Los Angeles	I C E (>500 HP) Emergency Elec Gen Diesel
Public Services	Pacoima	Spray Booth Paint And Solvent
Public Services	Downey	I C E (>500 HP) Emergency Elec Gen Diesel
Public Services	Westminster	I C E (>500 HP) Emergency Elec Gen Diesel
Recycling	Terminal Island	Misc Minerals Size Classification
Recycling	Anaheim	Misc Materials Size Classification
Recycling	Anaheim	Storage Silo Cement
Recycling	Anaheim	Storage Silo Cement
Recycling	Anaheim	Cement Blending
Recycling	Anaheim	Miscellaneous Conveying
Recycling	Anaheim	Miscellaneous Conveying
Recycling	Anaheim	Storage Silo Cement
Recycling Operations	Hawthorne	Waste Water Evaporation
Recycling Operations	Moreno Valley	Natural Rubber Size Reduction
Recycling Operations	Moreno Valley	Baghouse, Ambient Temp (>500 Sq Ft)
Recycling Operations	Gardena	Misc Materials Size Reduction
Recycling Operations	Sun Valley	Odor Control Unit
Roofing Company	Los Angeles	Tar Pot
Roofing Company	Los Angeles	Tar Pot
Roofing Company	Los Angeles	Tar Pot
Roofing Company	Los Angeles	Tar Pot

Facility Type	Facility Location	Equipment Description
Roofing Company	Los Angeles	Tar Pot
Roofing Company	Los Angeles	Tar Pot
Roofing Company	Orange	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Santa Ana	Tar Pot
Roofing Company	Riverside	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Gardena	Tar Pot
Roofing Company	Orange	Tar Pot
Roofing Operations	North Hollywood	Tar Pot
Roofing Operations	Costa Mesa	Tar Pot
Roofing Operations	Anaheim	Tar Pot

Facility Type	Facility Location	Equipment Description
Roofing Operations	Sylmar	Tar Pot
Sandblasting Operations	Maywood	Baghouse, Ambient Temp (<=100 Sq Ft)
Sandblasting Operations	Maywood	Abrasive Blasting (Cabinet/Machine/Room)
Sandblasting Operations	Maywood	Abrasive Blasting (Cabinet/Machine/Room)
Sandblasting Operations	Los Angeles	Baghouse, Ambient Temp (>100-500 Sq Ft)
Sandblasting Operations	Los Angeles	Abrasive Blasting (Cabinet/Machine/Room)
Sandblasting Operations	Cudahy	Foundry Sand Blending
Sandblasting Operations	Santa Ana	Foundry Sand Blending
Sandblasting Operations	Fontana	Abrasive Blasting (Open)
School	Carson	Adsorption Chillers (Gas Fired)>=5mmbtu
School	Carson	I C E (>500 HP) Non-Emergency Stat Nat Gas Only
School	Carson	Adsorption Chillers (Gas Fired)>=5mmbtu
School	Carson	Selective Catalytic Reduction
School	Carson	Adsorption Chillers (Gas Fired)>=5mmbtu
School	Pomona	Boiler (5-20 MMBTU/Hr) Nat Gas Only
School	Yucaipa	Boiler (<5 MMBTU /Hr) Nat Gas Only
School	Yucaipa	Boiler (<5 MMBTU /Hr) Nat Gas Only
School	Los Angeles	Boiler (<5 MMBTU /Hr) Nat Gas Only
School	Los Angeles	Boiler (<5 MMBTU/Hr) Nat Gas Only
School	Los Angeles	Boiler (<5 MMBTU /Hr) Nat Gas Only
School	Whittier	Boiler (5-20 MMBTU /Hr) Nat Gas Only
School	Whittier	Boiler (5-20 MMBTU /Hr) Nat Gas Only
School	Irvine	Soil Treat Vapor Extract Gasoline Under

Facility Type	Facility Location	Equipment Description
Sewage Treatment Plant	Colton	Waste-To-Energy Equipment
Sewage Treatment Plant	Colton	Control Systems, Four Or More In Series
Sewage Treatment Plant	Colton	Fly Ash Conveying
Sewage Treatment Plant	Colton	Baghouse, Ambient Temp (>500 Sq Ft)
Sewage Treatment Plant	Colton	Storage Silo Lime & Limestone
Sewage Treatment Plant	Colton	Storage Tank Silica Sand
Sewage Treatment Plant	Colton	Boiler (>20-50 MMBTU /Hr) Other Fuel
Sewage Treatment Plant	Thermal	Sewage Treatment (>5 M g/d) Aerobic
Sewage Treatment Plant	San Jacinto	Sewage Treatment (>5 M g/d) Anerobic
Sewage Treatment Plant	San Jacinto	Biofilter
Sewage Treatment Plant	San Jacinto	Sewage Treatment (>5 M g/d) Anerobic
Sewage Treatment Plant	Perris	I C E (>500 Hp) Emergency Elec Gen-Nat Gas
Sewage Treatment Plant	Sun City	Sewage Treatment (<=5 MM g/d)
Sewage Treatment Plant	Temecula	I C E (>500 HP) Non-Emergency Stat Nat Gas Only
Sewage Treatment Plant	Temecula	I C E (>500 HP) Non-Emergency Stat Nat Gas Only
Sewage Treatment Plant	Temecula	Sewage Treatment (>5 M g/d) Anerobic
Sewage Treatment Plant	Temecula	Sewage Treatment Plant
Sewage Treatment Plant	Moreno Valley	Flare
Sewage Treatment Plant	Moreno Valley	Ice (>500 HP) Emergency Port N-Rent Diesel
Sewage Treatment Plant	Rialto	Heater/Furnace (>20-50 MMBTU/Hr) Nat Gas
Sewage Treatment Plant	Rialto	Sewage Sludge Drying
Sewage Treatment Plant	Rialto	Flare, Enclosed Landfill/Digester Gas
Sewage Treatment Plant	Rialto	Sludge Dewatering

Facility Type	Facility Location	Equipment Description
Sewage Treatment Plant	Rialto	Regenerative Oxidizer
Sewage Treatment Plant	Playa Del Rey	Flare, Enclosed Landfill/Digester Gas
Sewage Treatment Plant	Playa Del Rey	Scrubber, Other Venting M.S.
Sewage Treatment Plant	Van Nuys	Storage Tank Ammonia
Sewage Treatment Plant	Van Nuys	Sewage Treatment (>5 M g/d) Aerobic
Sewage Treatment Plant	Rolling Hills Estates	Turbine Engine (<=50 MW) Landfill Gas
Sewage Treatment Plant	Rolling Hills Estates	Unspecified Equip/Process (schedule C in Rule 301)
Sewage Treatment Plant	Rolling Hills Estates	Flare, Enclosed Landfill/Digester Gas
Sewage Treatment Plant	Carson	Plasma Arc Cutting
Sewage Treatment Plant	Carson	Plasma Arc Cutting
Sewage Treatment Plant	Carson	Plasma Arc Cutting
Sewage Treatment Plant	Carson	Plasma Arc Cutting
Sewage Treatment Plant	Saugus	Activated Carbon Adsorber Drum Vent T.S.
Sewage Treatment Plant	Long Beach	Boiler/Hotwater Heater, Single Facility, Portable,<600,000 BTU/Hr, Diesel/Oil Fired
Sewage Treatment Plant	Cerritos	Plasma Arc Cutting
Sewage Treatment Plant	Trabuco Canyon	Sewage Treatment (<=5 MM g/d)
Sewage Treatment Plant	Lake Elsinore	Sewage Treatment (<=5 MM g/d)
Sewage Treatment Plant	Fountain Valley	Boiler (>10 MMBTU/Hr) Nat & Digester Gas
Sewage Treatment Plant	Riverside	Sewage Treatment (>5 M g/d) Anerobic
Sewage Treatment Plant	Running Springs	Sewage Treatment (<=5 MM g/d)
Sewage Treatment Plant	Devore Heights	Sewage Treatment (<=5 MM g/d)
Sewage Treatment Plant	Devore Heights	Scrubber, Odor

Facility Type	Facility Location	Equipment Description
Sewage Treatment Plant	Devore Heights	I C E (>500 HP) Emergency Elec Gen Diesel
Sewage Treatment Plant	Laguna Niguel	Sewage Treatment (<=5 MM g/d)
Sewage Treatment Plant	Laguna Niguel	Boiler (<5 MMBTU /Hr) Nat Gas & Pg; Res Recovery
Sewage Treatment Plant	Laguna Niguel	Flare, Open Landfill/Digester Gas
Sewage Treatment Plant	Laguna Niguel	Scrubber, Odor
Sewage Treatment Plant	Diamond Bar	Sludge Dewatering
Sewage Treatment Plant	Indio	Sewage Treatment (>5 Mg/D) Aerobic
Sewage Treatment Plant	Yucaipa	Storage Tank Methanol
Sewage Treatment Plant	Yucaipa	Sewage Treatment (<=5 MM g/d)
Soil Remediation	Gardena	Soil Treat Vapor Extract Gasoline Under
Steel Treating	South Gate	Dip Tank (<=3 gal/day) Misc
Tank Cleaning Operation	Gardena	Waste Water Treating <20,000 g/d, No Toxic
Terminal	Rialto	Ethanol Unloading
Terminal	Rialto	Ethanol Unloading
Textiles	Fullerton	Oven, Fabric (Tenter Frame)
Textiles	Fullerton	Oven, Fabric (Tenter Frame)
Textiles	Fullerton	Oven, Fabric (Tenter Frame)
Textiles	Fullerton	Oven, Fabric (Tenter Frame)
Textiles	Fullerton	Oven, Fabric (Tenter Frame)
Textiles	Fullerton	Oven, Fabric (Tenter Frame)
Textiles	Coachella	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Textiles	Vernon	Garnetting Paper/Polyester Polyester
Textiles	Vernon	Garnetting Paper/Polyester Polyester

Facility Type	Facility Location	Equipment Description
Textiles	Vernon	Garnetting Paper/Polyester Polyester
Textiles	Vernon	Garnetting Paper/Polyester Polyester
Textiles	Vernon	Garnetting Paper/Polyester Polyester
Textiles	South Gate	Abrasive Blasting (Cabinet/Machine/Room)
Textiles	South Gate	Spray Booth Other
Textiles	South Gate	Abrasive Blasting (Cabinet/Machine/Room)
Textiles	South Gate	Abrasive Blasting (Cabinet/Machine/Room)
Textiles	South Gate	Dry Filter (>500 Sq Ft)
Textiles	South Gate	Dry Filter (>500 Sq Ft)
Textiles	Los Angeles	Textiles, Recycled, Processing
Textiles	Los Angeles	Textiles, Recycled, Processing
Textiles	Los Angeles	Textiles, Recycled, Processing
Textiles	El Monte	Regenerative Oxidizer
Textiles	El Monte	Spray Booth Paint And Solvent
Textiles	El Monte	Regenerative Oxidizer
Textiles	El Monte	Boiler (>20-50 MMBTU/Hr) Nat Gas Only
Textiles	Long Beach	Boiler (5-20 MMBTU/Hr) Nat Gas Only
Textiles	Compton	Oven, Fabric (Tenter Frame)
Textiles	Compton	Printing Press Screen (All)
Transportation	Signal Hill	Carbon Adsorber
Transportation	Signal Hill	Truck Washing
Waste Disposal	Los Angeles	Storage Tank, Crude Oil W/O Control
Waste Disposal	Los Angeles	Bulk Loading/Unloading Rack, JP-8, >50k-200k g/d

Facility Type	Facility Location	Equipment Description
Waste Disposal	Los Angeles	Railroad Car Unloading Miscellaneous
Waste Disposal	Los Angeles	Storage Tank, Crude Oil W/O Control
Waste Disposal	Los Angeles	Storage Tank, Crude Oil W/O Control
Waste Disposal	Compton	Abrasive Blasting (Cabinet/Machine/Room)
Waste Disposal	Compton	Abrasive Blasting (Cabinet/Machine/Room)
Waste Disposal	Compton	Abrasive Blasting (Cabinet/Machine/Room)
Waste Disposal	Compton	Baghouse, Ambient Temp (>500 Sq Ft)
Waste Disposal	Compton	Tank, Surface Preparation - Other Acids
Waste Disposal	Compton	Tank, Chromic Acid - Anodizing
Waste Disposal	Compton	Tank, Surface Preparation - Other Acids
Waste Disposal	Lake View Terrace	Green Waste Screening
Waste Disposal	Lake View Terrace	I C E (50-500 HP) Non-Emergency Port N-Rent Oil
Waste Disposal	Lake View Terrace	I C E (50-500 HP) Non-Emergency Port N-Rent Oil
Waste Disposal	Lake View Terrace	Green Waste Screening
Waste Disposal	Lake View Terrace	Green Waste Screening
Waste Disposal	Lake View Terrace	Green Waste Screening
Waste Disposal	Valencia	Plasma Arc Cutting
Waste Disposal	Santa Ana	Boiler (<5 MMBTU/Hr) Nat Gas Only
Waste Disposal	Santa Ana	Boiler (<5 MMBTU /Hr) Nat Gas Only
Waste Disposal	Redlands	Green Waste Screening
Waste Disposal	Colton	Green Waste Screening
Waste Disposal	Colton	I C E (50-500 Hp) Non-Emergency Stat Diesel
Wastewater Treatment	Banning	Sewage Treatment (<=5 MM g/d)

Facility Type	Facility Location	Equipment Description
Wastewater Treatment	Banning	Flare, Enclosed Landfill/Digester Gas
Wastewater Treatment	Banning	Boiler (<=10 MMBTU /Hr) Landfill/Digester Gas & Other Oil
Wastewater Treatment	Banning	I C E (>500 HP) Emergency Elec Gen Diesel
Wastewater Treatment	Coachella	I C E (50-500 HP) Emergency Other, Diesel
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
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Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water

Facility Type	Facility Location	Equipment Description
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Container Filling Liquid Waste Water
Wastewater Treatment	Torrance	Storage Tank Fx Rf w/Ctl Misc Organic Material
Wastewater Treatment	Signal Hill	Baghouse, Ambient Temp (<=100 Sq Ft)
Wastewater Treatment	Long Beach	Afterburner, Catalytic
Wastewater Treatment	Long Beach	Afterburner, Catalytic
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Afterburner, Direct Flame
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Storage Tank Fx Rf w/Ctl Pet Mid Distill
Wastewater Treatment	Long Beach	Tank Degassing, Aboveground
Wastewater Treatment	Long Beach	Afterburner, Direct Flame
Wastewater Treatment	Long Beach	Afterburner, Direct Flame

Facility Type	Facility Location	Equipment Description
Wastewater Treatment	Long Beach	Pneumatic Conveyor
Wastewater Treatment	Long Beach	Afterburner, Direct Flame
Wastewater Treatment	Long Beach	Sparger
Wastewater Treatment	Long Beach	Sparger
Wastewater Treatment	Long Beach	Sparger
Wastewater Treatment	Long Beach	Sparger
Wastewater Treatment	Long Beach	Sparger
Wastewater Treatment	Long Beach	Sparger
Wastewater Treatment	Lynwood	Waste Water Treating (<10,000 g/d)
Wastewater Treatment	Lynwood	Afterburner, Direct Flame
Wastewater Treatment	San Pedro	Hydrogen Sulfide Treating
Wastewater Treatment	Rancho Cucamonga	Waste Water Treating <20,000 g/d, No Toxic
Wastewater Treatment	Laguna Niguel	Activated Carbon Adsorber Drum Vent T.S.
Wastewater Treatment	Los Angeles	Scrubber, Other Venting S.S.
Wastewater Treatment	Los Angeles	Waste Water Treating <20,000 g/d, No Toxic
Wastewater Treatment	Long Beach	Waste Water Treating >=10,000-<20,000 g/d
Wastewater Treatment	Irvine	Waste Water Evaporation
Wastewater Treatment	El Segundo	Waste H ₂ O Treating >50,000 g/d
Water Treatment Plant	Huntington Beach	I C E (50-500 HP) Non-Emergency Stat Nat Gas Only
Water Treatment Plant	Monrovia	Groundwater Treatment System
Water Treatment Plant	Colton	Unspecified Equip/Process (schedule C in Rule 301)
Water Treatment Plant	Rancho Cucamonga	I C E (>500 HP) Emergency Elec Gen Diesel
Water Treatment Plant	Colton	I C E (>500 HP) Emergency Fire Fighting-Diesel

Facility Type	Facility Location	Equipment Description
Water Treatment Plant	Chino	I C E (>500 HP) Non-Emergency Stat Other Fuel
Water Treatment Plant	Irvine	I C E (50-500 HP) Non-Emergency Stat Nat Gas Only
Water Treatment Plant	Irvine	I C E (50-500 HP) Emergency Elec Gen-Diesel
Water Treatment Plant	Long Beach	I C E (50-500 HP) Emergency Elec Gen-Diesel
Water Treatment Plant	El Segundo	Regenerative Oxidizer
Water Treatment Plant	El Segundo	Coating & Drying Equip Continuous Org, Web Type
Water Treatment Plant	Rancho Santa Margarita	I C E (50-500 HP) Non-Emergency Port N-Rent Oil
Water Treatment Plant	Wildomar	I C E (50-500 HP) Emergency Elec Gen-Diesel
Wood Treating	Fontana	Wood Material Treating

APPENDIX I

MODELING INPUT/OUTPUT FILES

To obtain copies of the Modeling input/output files used for the Draft PEA analysis, it is necessary to bring an electronic storage device, e.g., portable hard drive, to SCAQMD headquarters at the following address: 21865 Copley Drive, Diamond Bar CA., 91765. The electronic storage device must be capable of storing at least one to two terabytes of information. To obtain the input/output modeling files, please contact Steve Smith at 909.396.3054 or by e-mail at ssmith@aqmd.gov.

APPENDIX J

COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL ASSESSMENT

The following is a list of persons, organizations, and public agencies commenting on the Draft Program Environmental Assessment for Proposed Rule 1315.

Comment Letter #1

Communities for a Better Environment – Maya Golden-Krasner
Communities for a Safe Environment – Adriano Martinez
Natural Resources Defense Council – Adriano Martinez
California Communities Against Toxics – Angela Johnson Meszaros

Comment Letter #2

California Council for Environmental and Economic Balance – Bill Quinn

Comment Letter #3

Latham & Watkins, LLP, on behalf of the Regulatory Flexibility Group – Michael J. Carroll

Comment Letter #4

Department of Water and Power, the City of Los Angeles – Mark J. Sedlacek

Comment Letter #5

County Sanitation Districts of Los Angeles County – Gregory M. Adams

Comment Letter #5

Walnut Creek Energy, LLC – Jenifer Morris Lee

**CALIFORNIA COMMUNITIES AGAINST TOXICS
COALITION FOR A SAFE ENVIRONMENT
COMMUNITIES FOR A BETTER ENVIRONMENT
NATURAL RESOURCES DEFENSE COUNCIL**

November 9, 2010¹

Via email

Mr. Michael Krause
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
MKrause@aqmd.gov

**RE: Comments on Draft Program Environmental Assessment for Re-
adoption of Proposed Rule 1315—Federal New Source Review
Tracking System**

Dear Mr. Krause:

1-1 We submit these comments on the South Coast Air Quality Management
District's ("SCAQMD" or "District") Draft Program Environmental Assessment for Re-
adoption of Proposed Rule 1315—Federal New Source Review Tracking System
("DPEA") on behalf of the above-captioned organizations. These groups are
environmental and environmental justice organizations that work to improve air
quality and community health for residents in the South Coast Air Basin and other
affected areas. We request that the District consider and respond to these comments
and objections in the Final Program Environmental Assessment in accordance with
1-2 CEQA Guidelines section 15088.²

INTRODUCTION

1-3 We are deeply distressed to learn that, in the SCAQMD's assessment, the
adoption of Rule 1315 will result in staggering negative health impacts—most notably
that use of the Rule will result in 1 premature death every 3 weeks.³ We are not aware

¹ Corrected version sent November 10, 2010.

² On October 11, 2010, a large collection of organizations from across the State asked the SCAQMD for an extension of time to November 23 to comment on this DPEA. On October 15, the SCAQMD responded allowing only until November 9 for comment based upon a recitation of CEQA Guidelines § 15105. For the record, we direct the SCAQMD's attention to CEQA Guidelines § 15141 - Page Limits: The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages. Given that the DPEA is approximately 1,900 pages, granting the entire extension requested would have been entirely reasonable.

³ We note, however, that the SCAQMD has historically taken the position that Rule 1315 does "not, directly or indirectly, result in any adverse effect on the environment." 2007 Final Program Environmental Assessment 1-10. See generally, Comments on Draft Program Environmental Assessment for Proposed Amended Rule 1309.1 - Priority Reserve and Proposed Re-adopted Rule 1315 - Federal New Source Tracking System, June 29, 2007. As a result, it is not surprising that despite a direct order from

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of any air pollution control district in the country that has ever proposed to undertake a project that would result in the massive negative health and environmental impacts described by the SCAQMD in this DPEA. We are equally distressed to find that the SCAQMD staff has offered no mitigation for this massive air pollution project and has proposed that the Governing Board reject the *Environmentally Superior, Least Toxic Alternative* ("Alternative D") to the proposed project. Even as the SCAQMD staff notes that Alternative D will meet the project's objectives, it refuses to recommend Alternative D, even though it would "result in substantially lower air quality, health, and greenhouse gas impacts for most milestone years than the proposed project and the other projects."

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Although the admitted magnitude of impacts from the proposed project is enormous, the DPEA still understates the true scope and impact of the proposed project. If implemented, it is reasonably foreseeable that even more death and illness will occur than is detailed in the document.

While this is the third time that the SCAQMD has attempted to adopt this project, the project still lacks a clear and stable project description that corresponds to the project that the SCAQMD has analyzed in the DPEA. Further, the SCAQMD has proposed a "future baseline" that not only fails to provide information about the actual existing environment by which to measure the impacts of the project, but also works as an artificial and implausible rationale for the SCAQMD's failure to analyze the project's true impacts. In fact, the DPEA systematically under-discloses the impacts of the real project the SCAQMD seeks to undertake: creating and banking hundreds of thousands of pounds per day of air pollution emission reduction credits. Once created and banked, it is reasonably foreseeable that the credits will result in air pollution emissions. CEQA generally, and the ruling from the Los Angeles Superior Court in particular on this exact issue, require the SCAQMD to disclose, analyze, and mitigate the impacts of the massive expansion of the SCAQMD's emissions bank. Yet, after disclosing the impacts caused by only a portion of the real project, the SCAQMD fails to provide any mitigation of its staggeringly large impacts and refuses to adopt a scaled-down version of the project that is both feasible and meets the objectives of the project.

The SCAQMD has proposed a project that would create *at least* 222,000 pounds *per day* of pollution credits,⁴ but has decided to analyze the impacts of only subset of those emissions credits because, according to the SCAQMD, the rest of the credits will not be used. If a project proponent were to build 222,000 houses, but decided to analyze the impacts of building only some of them because some would always be vacant, the absurdity of the project proponent's position would be clear. The

the Los Angeles Superior Court to consider the project to be the impact of emission all the credits created by Rule 1315, SCAQMD persists in analyzing only a subset of the credits this project will create.

⁴ This sum is based upon the numbers disclosed by the SCAQMD in its 2007 PEA as tabulated and presented to the Los Angeles Superior Court in NRDC v. SCAQMD, Los Angeles Super. Ct. Case No BS110792. These numbers covered the period between 1990 and 2003 and were never disputed by the SCAQMD. Oddly, the SCAQMD notes in the Staff Report that accompanied the release of the DPEA that the information about how many thousands of pounds per day of pollution emissions the SCAQMD plans to credit to its bank "will be available no later than November 3, 2010 or 30 days before the Board Meeting at which the Proposed Rule 1315 is considered, whichever comes later." Staff Report at p. 20 and I-1. As of November 9, 2010, we do not have the information. Without this number, it is not even possible to know, much less evaluate the impacts of the project on the environment.

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proposition from the SCAQMD that it does not have to analyze all of the emissions it creates and banks, all of which could be distributed if the SCAQMD or the legislature so chooses, but that instead it can analyze just a subset of emission credits it creates and banks, is equally problematic.

For reasons that are unclear, the SCAQMD has decided to embark on a massive (nearly 1,900 page) undertaking in its most recent DPEA, comprised of a complex story of purported detailed analysis of the impacts of its project. And still, despite all of this effort, the SCAQMD has failed to disclose, analyze, and mitigate what the project actually is: creating and banking at least 222,000 pounds per day of air pollution emissions credits, including retroactively creating and banking credits for pollution that has not been in the air since 1990, in addition to the amount that would be created prospectively from the new methods of creating pollution credits for use in the South Coast Air Basin and beyond. All these changes are being undertaken to facilitate the addition of more sources of air pollution to this already desperately over-polluted region (and for export to other regions).

In this, the third attempt to adopt this project, the DPEA remains fatally flawed.

DISCUSSION

CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process. In short, a project must be open for public discussion and subject to agency modification during the CEQA process. This process helps demonstrate to the public that the agency has in fact analyzed and considered the environmental implications of its action.⁵

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The DPEA is substantively inadequate, failing to meet even the most basic requirements of CEQA. The DPEA makes clear that the SCAQMD is doggedly determined to adopt a rule with the exact same pollution generation provisions as the rule adopted in 2006, to provide no mitigation for the rule's impacts, and to refuse to adopt a feasible alternative that significantly reduces the number of people who would suffer from the project. In so doing, the SCAQMD's DPEA shows that the project is not "open for public discussion and subject to agency modification during the CEQA process." This approach contravenes CEQA, the policies of the state, and the trust of the people of the South Coast, Coachella, Antelope, Mojave, and Salton Sea Air Basins.⁶

⁵ *Concerned Citizens of Costa Mesa, et al v. 32nd District Agricultural Association* (1986) 42 Cal. 3d 929, 936.

⁶ The creation of the emission reduction credits by the SCAQMD has impacts beyond the South Coast Air Basin because the credits banked here can be transferred to those other Basins. See, e.g., Health and Safety Code section 40709.6 (allowing the transfer of credits to other basins.) The attempted transfer to the Antelope Air Basin of credits through the rescinded Rule 1309.1 for use by two power plants in that air basin, and the use of emission reduction credits by the Sentinel Power Project, located in the Coachella Valley Air Basin are two recent examples of these kinds of transfers. This history shows that

I. The Project Description and Objectives are Fatally Flawed

CEQA requires that a project description and statement of objectives be accurate and consistent throughout an EIR. An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.⁷ Such a description is critical in order for agencies and the public to fully and accurately evaluate the potential impacts of a project. This premise is entrenched in CEQA and in its jurisprudence. Indeed since 1977, courts have repeatedly stated that:

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A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental costs, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance.⁸

Similarly, "[a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."⁹

A. The Project Description Fails to Describe the Actual Project, and Masks the Nature of the Project

The DPEA includes a Project Description chapter that is 23 pages long, with the sub-section titled "Project Description" covering 7 pages. The language of the Project fails to provide necessary substantive information as required by CEQA. The very first sentence under the title "Project Description," states:

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The proposed project consists of adopting a revised version of Rule 1315. The major components of proposed Rule 1315 are briefly summarized in the following subsections. A complete copy of proposed Rule 1315 can be found in Appendix A.¹⁰

Telling in this language is the concept of the project as "adopting a revised version of Rule 1315." It is beyond dispute that no current version of Rule 1315 exists, as it was rescinded by the SCAQMD Governing Board, pursuant to an order by the Los Angeles Superior Court. Under CEQA, a "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the

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such transfers are reasonably foreseeable, especially since the SCAQMD has shown an eagerness to support power plants' bids to obtain CEQA exemptions from the legislature, allowing them access to the SCAQMD's bank of credits.

⁷ *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 738; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.

⁸ *County of Inyo*, 71 Cal.App.3d at 192-93.

⁹ CEQA Guidelines §§ 15124(b), 15124(b).

¹⁰ DPEA, p. 2-12.

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environment, or a reasonably foreseeable indirect physical change in the environment.”¹¹ While in some sense “adopting a revised version of Rule 1315” is the act that will result in the impact on the environment, such a description is completely devoid of content, failing to provide the information needed for decision-making.

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Actually, the “project” proposed by the SCAQMD is: create and bank *at least* 222,000 pounds *per day* of air pollution emissions reductions, including retroactively creating and banking credits for pollution that has not been in the air since 1990, in addition to the amount that would be created prospectively from the new methods of creating pollution credits for use in the South Coast Air Basin and beyond.¹² The DPEA does not articulate this—or anything like this—as the project. Indeed, there is really no way to know by reading the project description anything about the size and scope of the project. Indeed, the DPEA does not disclose anywhere how many credits will be created by the project.¹³

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The SCAQMD’s choice to emphasize the readoption of the previous Rule as its project demonstrates that, rather than figuring out the environmentally superior, least toxic way to accommodate its stated objectives, the SCAQMD has determined that its real goal is to adopt essentially the same Rule it adopted in 2006 regardless of massive environmental impacts its long-delayed environmental review identified.

Further, even if the proposed project description of “adopting a revised version of Rule 1315” were adequate and meaningful, the DPEA does not then proceed to analyze the impacts of adopting the Rule, but instead analyzes the impacts of Rules 1304 and Rules 1309.1. This highlights a fundamental flaw of the DPEA: it does not disclose, analyze, or mitigate the impact of the proposed Rule.

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The DPEA states that the proposed project does not include the emission reduction credits created by the SCAQMD under the District-sponsored SB 827 (Wright, 2009) and District-supported AB 1318 (M. Perez, 2009). Excluding those emission reduction credits is improper for three reasons. First, the legislative direction in both of those statutes was clear: the District is to follow all of the mandates of the Superior Court detailed in *NRDC v. SCAQMD*. The Court directed the SCAQMD to undertake environmental review of all of the credits it creates. Second, the SCAQMD’s decision to include the impacts of the credits created with identical language in SB 827 and AB 1318 for the period beginning July 2010, but not the impacts of the creation of credits for the period of January 2010 through June 2010 is completely arbitrary and is another way that the DPEA hides the true impacts of the proposed project. Third, the project is the creation of credits both retroactively to 1990 and prospectively into the future; it is improper to carve out the six month period between January 2010 and June 2010—or any other period—from the analysis of the impacts of the project.

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¹¹ CEQA Guidelines § 15378(a).

¹² The contention that the “project” will end in 2030 is misleading and inappropriate since the need for and use of the banked emission reduction credits will continue as long as the South Coast Air Basin fails to attain either the federal or state Ambient Air Quality Standards.

¹³ In Chapter 8, *Response to the Court’s Decision*, the DPEA purports to analyze the “starting balances as of 12-31-06 as the ‘maximum use scenario.’” The starting balances on 12-31-06 are not the amount of emission credits created by this project.

B. The Project Objectives are Likely to Mislead the Public and Agencies

The primary purpose of an EIR (or EA, in this case) is to inform the public, and agencies that may be concerned, of the project's purpose, scope and impacts. The DPEA provides three "Project Objectives": 1) maintain the ability to administer the new source review program for major and minor sources and to accommodate population growth through implementation of Rule 1304 and Rule 1309.1; 2) memorialize in rule form the accounting procedures used to establish equivalency of the New Source Review Program; and 3) recognize sufficient previously-unused emission reductions to demonstrate federal equivalency.¹⁴

In this list, the SCAQMD has offered as objectives a series of justifications, based on unreasonable and inconsistent assumptions, for the SCAQMD's chosen rule. The three articulated objectives of the project do not clarify the project description, and all three objectives, in fact, hide important aspects of the project.

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First, the SCAQMD's objective of "accommodat[ing] [the] population growth" predicted in the 2007 AQMP¹⁵ provides an illustration of shifting assumptions underlying its objectives in order to justify the project. In the project Description, as well as discussion of impacts, the District insists the project is intended merely (read: benignly) to accommodate population growth that is already predicted to occur.¹⁶ To the contrary, however, in the District's Baseline discussion, the District assumes the project will, in fact, *effect* this growth.¹⁷ This sleight of hand appears throughout the document, and provides a convenient way for the District to justify its pre-chosen Rule 1315. For instance, one reason the District notes Alternative D is the environmentally superior alternative is because it will not cause as much emissions growth, and will therefore lead to fewer air impacts than the preferred project. At the same time, one reason the District simultaneously *rejects* Alternative D is that it would not accommodate the population growth predicted in the AQMP.

One important reason for the confusion about accommodating and facilitating growth in the PEA is that the District conflates population growth, economic growth, and emissions growth throughout the document. The District assumes accommodating population growth means allowing increased emissions, necessitating an increased supply of emissions credits. On the contrary, AQMP predictions about future population growth do not necessarily translate into increased emissions, and neither does the desire to facilitate economic growth.

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The SCAQMD indeed must plan to accommodate the population growth predicted in the AQMP. The measures used, however, must comply with the state and

¹⁴ DPEA p. 2-20.

¹⁵ *Id.*

¹⁶ The DPEA states one of the Project's objectives is to "maintain the SCAQMD's ability to continue to administer its new source review program for major and minor sources for facility modernization and to accommodate population growth through implementation of Rule 1304 and 1309.1." (DPEA, pp. 1-1, 2-20, emphasis added.)

¹⁷ "The analysis assumes that if the project were not approved, a portion of the regional growth projected in the AQMP would not occur and future regional emissions without the project would be lower than they would be with the future project." (DPEA, pp. 1-5, 4.0-3.)

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federal Clean Air Act mandates to achieve attainment of the National and California Ambient Air Quality Standards.¹⁸ Yet, the SCAQMD admits that the Project may well slow attainment for PM and ozone:

In the future, additional emissions reduction measures will be needed beyond the control measures identified in the 2007 AQMP in order to reduce ambient ozone levels to achieve attainment of the ... [ozone standards].... It cannot be ascertained precisely when these standards will be attained.... It is possible that, without the project, attainment of the ozone and particulate matter NAAQS and CAAQS could occur at an earlier date than under the conditions of the proposed project....¹⁹

Generating credits from pollution that disappeared from the South Coast's skies in 1990 is anathema to the legal requirement that the South Coast achieve and maintain air quality standards; nor does the creation and distribution of credits contribute to the District's mandate to encourage economic growth based on cleaner technologies, such as alternative fuels.²⁰

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In the second stated objective, the SCAQMD uses the word "memorializing" to describe its activities related to the new "accounting procedure", implying that it is not changing its past "accounting" practices. In fact, the District is inventing new, never before ways to *generate* emission credits to deposit into its accounts—changing its generation procedures not only prospectively, but also retroactively back thirty years. This new system has never legitimately been approved. In 2008, the Superior Court issued an injunction prohibiting the SCAQMD from relying on, or in any way using, the system described in the 2006/2007 version of Rule 1315. If the SCAQMD's representation that these generation methods are in use were true, the SCAQMD would be in direct violation of a court's injunction. The second objective hides the fact that the SCAQMD's intention is to adopt a rule that articulates new credit generation procedures to be used, changing the existing procedures both prospectively and retroactively. To cast these changes as simply memorializing the status quo, could lead reviewers to believe that the accounting system currently is, and has been, in use.

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The third objective is likewise misleading. It suggests that the project would recognize only enough previously-unused emission reductions to show federal equivalency, when in fact, the project would create hundreds of thousands of pounds of new pollution credits per day, far in excess of what would be required to replace credits the U.S. EPA found the District relied upon in violation of federal law.

¹⁸ See, e.g., Health & Safety Code § 40910, which requires that the SCAQMD achieve and maintain state ambient air quality standards by the earliest practicable date. See also Health & Safety Code § 40440(c), which requires the SCAQMD to "adopt rules and regulations that will assure that all its administrative practices and the carrying out of its programs are...consistent with the goals of achieving and maintaining federal and state ambient air quality standards and achieving the purposes of this chapter." One of these purposes includes "the rapid abatement of existing emission levels to levels which will result in the achievement and maintenance of the state and federal ambient air quality standards and to ensure that new sources of emissions are planned and operated so as to be consistent with the basin's air quality goals." Health and Safety Code § 40402(e).

¹⁹ DPEA, p. 1-10.

²⁰ See Health & Safety Code § 40440(b), which requires the SCAQMD to adopt rules and regulations that, for instance, "promote cleaner burning alternative fuels."

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This potential confusion is compounded by the fact that the project description is inconsistent in its discussion of what types of emission reductions will be credited to its internal accounts. The PEA states that the project allows credits to be used for federal purposes that although they were tracked under state law, had not previously been tracked before for federal purposes.²¹ In a footnote, however, the PEA admits that:

Many, but not all, of the sources of offset credits that had not previously been accounted for in federal tracking were previously tracked for purposes of demonstrated equivalency with California "No Net Increase" (NNI) requirements. Specifically, shutdowns and reductions from minor sources, regardless of how small, were tracked for state purposes for VOC and NOx. Shutdowns and reductions from minor sources of CO, PM10 and SOx were tracked for state purposes if emissions were 15 tons per year or more, the threshold for state NNI tracking.²²

The Rule appears to use these reductions, previously untracked even for state purposes, as new sources of credits in the District's internal accounts.

Thus, neither the "project objectives" nor the project description as a whole accurately represents the project. As such, they are woefully inadequate to inform the public or other decision-makers of what the project *actually is*.²³ Overall, the District fails to provide the public or other decision makers with an accurate, stable, consistent, and finite description of the program. This failing permeates the entire PEA, and is based on flawed assumptions about the baseline, the program's end dates, and about how many credits will be generated and used, all of which serve to undermine the SCAQMD's impacts and alternatives analyses.

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II. The DPEA Fails to Analyze the True Impacts of the Project

A PEA must articulate and analyze all direct and indirect impacts the proposed project may have. As noted in our comments on the 2007 DPEA, the DPEA for the previous attempt to adopt Rule 1315 and Rule 1309.1 ("2007 Comments"), the Air Resources Board has estimated that more California residents die from their exposure to air pollution than those who die from traffic accidents and homicide, combined.²⁴ California is truly facing a public health crisis due to air pollution. Further, there is now a clear consensus that particulate matter has devastating impacts on health, particularly on the health of children.²⁵ The 2007 Comments describe in detail the

²¹ DPEA, p. 1-4.

²² DPEA, p. 2-13.

²³ The contention that the "project" will end in 2030 is misleading and inappropriate since the need for and use of the banked emission reduction credits will continue as long as the South Coast Air Basin fails to attain either the federal or state Ambient Air Quality Standards.

²⁴ Air Resources Board, Recent Research Findings: Health Effects of Particulate Matter and Ozone Air Pollution, January 2004 (<http://www.arb.ca.gov/research/health/fr/PM-03fr.pdf>)

²⁵ California Communities Against Toxics et al., Comments on Proposed Amended Rule 1309.1 - Priority Reserve; and Proposed re-adopted Rule 1315 - Federal New Source Tracking System (May 29, 2007) ("2007 Comments"), p. 2.

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Cont. ↑ air quality, health, aesthetic, and regulatory impacts of Rule 1315.²⁶ Although the SCAQMD attempts to address these impacts in its DPEA, because the analysis incorrectly focuses on how many credits will be distributed rather than generated, and places artificial limitations on its analysis, the document grossly underestimates and minimizes the impacts the project will have on health and the environment.

1-19 The SCAQMD's misconception begins with its definition of the project as limited to distribution of permits, instead of the creation and banking of emission reduction credits and the reasonably foreseeable result of creation and banking of credits: that emissions will be allowed by those credits. As the superior court stated with respect to the SCAQMD's 2006 PEA for Rules 1315 and 1309.1, however,

[i]t is the universe of emission credits (and, foreseeably and consequently, the emissions that will be allowed thereby to be released into the environment) that is at the heart of a programmatic assessment of the rule-making.... Nor is the impact of Rule 1315—on a programmatic basis—limited to the eleven power plants currently in line for Priority Reserve access.²⁷

1-20 Nor, here, is the impact limited to the District's new suggested foreseeable projects—three power plants and facilities under current versions of 1304 and 1309.1—that will likely receive Priority Reserve credits. Rather, the District must analyze the consequences of all the credits available being used.

1-21 Compounding the SCAQMD's low estimate of the impacts of the project, the SCAQMD artificially and inexplicably limits its analysis of the health effects of the pollution to the effects on people over 25 years old.²⁸ Yet, in one of the nation's most comprehensive studies on the impact of pollution on children, USC Keck School of Medicine preventive medicine researchers have clearly demonstrated the significant relationship between PM 2.5 and slow lung growth in children.²⁹ Elderly, women of child-bearing age, people with existing heart and lung disease, and other subpopulations with limited access to healthcare are also particularly vulnerable to the adverse health impacts of PM 2.5 and PM10.

↓ The SCAQMD did provide an estimate (albeit based on faulty assumptions that emissions will be lower than the project actually creates) of excess morbidity cases from cancer, decreased respiratory function (bronchitis, respiratory illness) and heart attacks, as well as the increase in emergency

²⁶ See *id.*, pp. 2-8.

²⁷ Judge Ann I. Jones, Decision on Ruling on Respondent's Motion for Summary Adjudication, BS 110792, July 29, 2008 ("2008 Decision"), p. 12.

²⁸ While this point is not made clear in the text of the DPEA, it is shown in the extra data files that accompanied the release of the DPEA. See, e.g., SCAQMD Rule 1315 data\AERMOD_Modeling\Sentinel_Mortality.xlsx.

²⁹ W. James Gauderman, Frank Gilliland, Hita Vora, Edward Avol, Daniel Stram, Rob McConnell, Duncan Thomas, Fred Lurmann, Helene G. Margolis, Edward B. Rappaport, Kiros Berhane and John M. Peters, "Association between Air Pollution and Lung Function Growth in Southern California Children: Results from a Second Cohort," *American Journal of Respiratory and Critical Care Medicine*, Vol. 165, No. 13, July 1, 2002.

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room and hospital visits, as well as lost activity and work (though not school) days. In addition to these numbers in themselves being low estimates, the SCAQMD seems to ignore substantial evidence linking PM and ozone to elevated risks for other illnesses and causes of death, including, but not limited to: diabetes, neurological diseases, low birth weight, infant bronchiolitis, postneonatal mortality, infant mortality, sleep apnea, and suicide.³⁰ Further, studies have also shown that climate change will exacerbate the environmental and health impacts of ozone and PM,³¹ a fact the SCAQMD ignores despite the project's 20-year timeline.

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For most other potential impacts, the SCAQMD simply punts any analysis to future environmental review, rather than examining the impacts from the project as a whole. For instance, the SCAQMD believes that the only impacts on biological resources are from facility construction and siting.³² By ignoring the impacts of the entire project, the SCAQMD fails to analyze the impact of increased air pollution on sensitive species, such as lichens,³³ other species, such as leafy vegetables,³⁴ and even whole ecosystems, such as Southern California's mixed conifer forests.³⁵

³⁰ See, e.g., J.F. Pearson, C. Bachireddy C, S. Shyamprasad, A.B. Goldfine, J.S. Brownstein, "Association between fine particulate matter and diabetes prevalence in the U.S.," *Diabetes Care*, Vol. 33, No. 10, Oct. 2010, pp. 2196-201; J.C. Chen, J. Schwartz, "Neurobehavioral effects of ambient air pollution on cognitive performance in US adults," *Neurotoxicology*, Vol. 30, No. 2, March 2009, pp. 231-39; X. Xu, R.K. Sharma, E.O. Talbot, J.V. Zborowski, J. Rager, V.C. Arena, C.D. Volz, "PM10 air pollution exposure during pregnancy and term low birth weight in Allegheny County, PA, 1994-2000," *International Archives of Occupational and Environmental Health*, May 23, 2010; J.H. Seo, J.H. Leem, E.H. Ha, O.J. Kim, B.M. Kim, J.Y. Lee, H.S. Park, H.C. Kim, Y.C. Hong, Y.J. Kim, "Population-attributable risk of low birthweight related to PM10 pollution in seven Korean cities," *Paediatric and Perinatal Epidemiology*, Vol. 24, No. 2, March 2010, pp. 140-48; C.J. Karr, P.A. Demers, M.W. Koehoorn, C.C. Lencar, L. Tamburic, M. Brauer, "Influence of ambient air pollutant sources on clinical encounters for infant bronchiolitis," *American Journal of Respiratory Critical Care Medicine*, Vol. 180, No. 10, Nov. 15, 2009, pp. 995-1001; T.J. Woodruff, L.A. Darrow, J.D. Parker, "Air pollution and postneonatal infant mortality in the United States, 1999-2002," *Environmental Health Perspectives*, Vol. 116, No. 1, Jan. 2008, pp. 110-15; L. Carbajal-Arroyo, V. Miranda-Soberanis, M. Medina-Ramón, L. Rojas-Bracho, G. Tzintzun, P. Solís-Gutiérrez, I. Méndez-Ramírez, M. Hurtado-Díaz, J. Schwartz, I. Romieu, "Effect of PM10 and O3 on infant mortality among residents in the Mexico City Metropolitan Area: a case-crossover analysis, 1997-2005," *Journal of Epidemiology and Community Health*, Aug. 18, 2010; A. Zanobetti, S. Redline, J. Schwartz, D. Rosen, S. Patel, G.T. O'Connor, M. Lebowitz, B.A. Coull, D.R. Gold, "Associations of PM10 with sleep and sleep-disordered breathing in adults from seven U.S. urban areas," *American Journal of Respiratory Critical Care Medicine*, Vol. 182, No. 6, Sept. 15, 2010, pp. 819-25; C. Kim, S.H. Jung, D.R. Kang, H.C. Kim, K.T. Moon, N.W. Hur, D.C. Shin, I. Suh, "Ambient particulate matter as a risk factor for suicide," *American Journal of Psychiatry*, Vol. 167, No. 9, Sept. 2010, pp. 1100-07.

³¹ H.H. Chang, J. Zhou, M. Fuentes, "Impact of climate change on ambient ozone level and mortality in southeastern United States," *International Journal of Environmental Research and Public Health*, Vol. 7, No. 7, July 2010, pp. 2866-80; K. Ebi, G. McGregor, "Climate change, tropospheric ozone and particulate matter, and health impacts," *Cien Saude Colet*, Vol. 14, No. 6, Nov.-Dec. 2009, pp. 2281-93.

³² DPEA, pp. 5.4-32 - 36.

³³ Jenifer Hutchinson, Debbie Maynard, and Linda Geiser, "Air Quality and Lichens - A Literature Review Emphasizing the Pacific Northwest, USA," USDA Forest Service, Pacific Northwest Region Air Resource Management Program, Dec. 16, 1996, available at: <http://www.fs.fed.us/r6/air/lichen/almanac.htm>. See also "Lichens as Bioindicators of Air Pollution," available at: <http://mason.gmu.edu/~jlawrey/CUE/sensitivity>.

³⁴ J. P. Bennett, "The Interaction of Low Levels of Ozone and Relative Humidity on Leafy Vegetables: Final Report to the California Air Resources Board," Contract No. A6-194-30, March 6, 1979, available at: <http://www.arb.ca.gov/research/anr/past/a6-194-30.pdf>.

³⁵ Patrick J. Temple, Andrzej Bytnerowicz, Mark E. Fenn, and Mark A. Poth, "Air Pollution Impacts in the Mixed Conifer Forests of Southern California," *USDA Forest Service General Technical Report*, PSW-GTR-

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In addition to deferring much of its impacts analysis to future projects, and basing its air quality impacts analysis on speculative musings about how many credits the SCAQMD thinks it might give out, rather on the very concrete number of credits the project is generating, the impacts analysis is handicapped by other flaws in the DPEA. Unreasonable assumptions about future conditions permeate the DPEA, and consistently lead the SCAQMD to underestimate the project's impacts.³⁶

III. The Baseline is the Condition at the Time of the Notice of Preparation, not Future, Hypothetical Conditions

Pursuant to section 15125 of the CEQA Guidelines:

An EIR must include a description of the *physical environmental conditions* in the vicinity of the project, as they exist at the time the notice of preparation is published, This environmental setting will normally constitute the baseline

A. Imposing a Future Baseline Dramatically Understates the Project's Scope

The DPEA states that "because the project will be carried out over the next twenty years, a 'future' baseline is appropriate for assessing the project's emission-related effects."³⁷ This baseline assumes reduced future "regional emissions of all pollutants" as a result of effectuation and success of the 2007 AQMP, instead of simply looking to existing actual levels to set a baseline from which to measure impacts. The document explains:

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The PEAs therefore compares forecasts of future emissions with the proposed project in place to forecasts of future emissions without the proposed project. The analysis assumes that if the project were not approved, a portion of the regional growth projected in the AQMD would not occur and future regional emissions without the project would be lower than they would be with the project.³⁸

In other words, the "baseline" chosen by the SCAQMD is the forecasted world with the project and then the analysis of the project consists of subtracting emissions from the future, hypothetical world. In that future, hypothetical world, the SCAQMD attains the federal NAAQS in various milestone years thereby eliminating the need to use the emission reduction credits that this project creates. Further, in this future, hypothetical world the emission growth levels are the predicted levels from the 2007 AQMP. Not only is the use of a "future baseline" legally unwarranted, the practical

195. 2005. For more studies on biological resources and air pollution, see California Air Resource Board, Air Pollution Research Reports/Studies – Ecological Effects of Air Pollution, available at: <http://www.arb.ca.gov/research/apr/past/ecol.htm>.

³⁶ An EIR prepared for a temporary project may be found deficient if evidence shows a reasonable probability that the project will last longer than identified in the project description. (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1450-1455.) Further, assumptions about future activities must be reasonable, and supported by substantial evidence and expert opinion. (*Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018; *San Francisco Ecology Ctr. v. County of San Francisco* (1975) 48 Cal.App.3d 584.)

³⁷ DPEA, p. 1-5.

³⁸ DPEA, p. 1-5.

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Cont.

effect of this “future baseline” is that the SCAQMD discloses the impacts of some, but not all of the emission reduction credits created by the proposed project. This is exactly what the courts have consistently and clearly prohibited. As the Supreme Court noted in March of this year in a case in which the SCAQMD was a defendant: “An approach using hypothetical allowable conditions as the baseline results in ‘illusory’ comparisons that ‘can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts,’ a result at direct odds with CEQA’s intent.”³⁹

Every project analyzed by CEQA will occur in the future, so the fact that this project will occur in the future is not a rational justification for reliance upon a “future baseline.” CEQA clearly provides that the baseline against which to measure the project’s impacts are the environmental conditions that exist when the agency embarks on its CEQA review, not hypothetical conditions, whether future or past. The baseline is different from the “No Project Alternative,” which should look forward to see the distinction between a future with the project and a future without the project.⁴⁰ The DPEA’s reliance on a future baseline prematurely ends the analysis of the Project’s impacts by assuming attainment in attainment years. Unfortunately, the District may not meet the NAAQS in the projected year, and as explained further below it does not have a plan in place to meet the NAAQS with respect to the 1997 annual PM_{2.5} standard or the 8-hour ozone standard, contrary to the DPEA’s assumption.

By assuming that future environmental gains will occur, and relying on three specific future years during the project’s 20-year life, the DPEA adopts an improper baseline and fails to account for the actual impacts the Project will impose on the environment.

The DPEA’s reliance upon a future baseline does not result in a fuller exposition of project impacts that might otherwise be hidden by reductions in permitted emissions. It instead serves to shift the focus of decision-makers away from the impacts of this project, to focus on “reductions forgone” by the project. By employing this shift in focus, the DPEA invites decision-makers and the public to view the air quality as being much cleaner than today, even with this project instead of having the clear-eyed discussion of the air getting dirtier *because* of this project.

This future, hypothetical baseline is the justification provided in the DPEA to stop attributing emissions to new facilities that would rely upon the emission reduction credits created and banked by the project after 2014 for PM, 2023 for SO_x, and 2030 for ozone. The incorrect baseline masks the impacts and significance of changing how the SCAQMD creates pollution credits. The change allows the District to capture and bank at least 222,000 pounds *per day* of air pollution emissions reductions retroactively to 1990, plus whatever the amount that would be created prospectively from the policy change, for use in—and beyond—the South Coast Air Basin to facilitate the addition of more sources of air pollution. The use of an incorrect hypothetical baseline leads to a vast underestimate of project’s impacts.

The baseline is not the place to calculate the scope of the Project – the baseline is the actual environment as it exists in March 2009, when the District issued the

³⁹ *CBE v. SCAQMD* (2010) 48 Cal.4th 310, 322 (quoting *Environmental Planning Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 358).

⁴⁰ Remy, Thomas, Moose and Manley *Guide to CEQA*, pp. 207-208.

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Notice of Preparation for Rule 1315. To that actual baseline, the DPEA must compare the impact of the total new credits to be created.

1-25

B. The DPEA Cannot Use an Unsubstantiated Attainment Argument to Curtail Analysis of Impacts from Harmful Particulate Matter Emissions.

In analyzing the air quality impacts from the proposed project, the DPEA dramatically underestimates the health impacts from PM emissions.⁴¹ Specifically, the DPEA includes a curtailed analysis by presuming no emission reduction credits will be issued from the SCAQMDs bank after 2014. The DPEA substantiates this decision by improperly claiming that the 2007 AQMP “demonstrated attainment with the annual [PM2.5] NAAQS by 2015.”⁴² This statement is wrong for two distinct reasons: EPA has not approved the 2007 attainment demonstration for the PM2.5 plan, and EPA’s regulations preclude the SCAQMD from assuming the 2007 PM 2.5 plan demonstrates attainment.

First, EPA has not approved the attainment demonstration for the PM2.5 plan that was submitted in 2007. In fact, the EPA released a Federal Register Notice that provided for the following action:

EPA is proposing to disapprove the attainment demonstration because it does not provide sufficient emissions reductions from adopted and EPA approved measures to provide for attainment of the NAAQS.⁴³

EPA clearly does not believe the SCAQMD, under its current plan, will come into attainment by 2015, nor does EPA intend to extend the attainment deadline. Besides, absent this approval of the attainment demonstration by EPA, the DPEA cannot rely on the fact that the 2007 PM2.5 plan will attain the annual PM2.5 standard by 2014.

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Second, even if the commitments to adopt regulations in the 2007 PM SIP actually could meet attainment requirements, EPA’s regulations preclude the DPEA from assuming the 2007 PM SIP demonstrates attainment. Specifically, EPA requires states and regions to submit adopted, enforceable control measures. In pertinent part, EPA’s regulations provide the following:

Emission limitations and other measures necessary for attainment and maintenance of any standard, including any measures necessary to implement the requirements of subpart L must be adopted as rules and regulations enforceable by the State agency. Copies of all such rules and regulations must be submitted with the plan. Submittal of a plan setting forth proposed rules and regulations will not satisfy the requirements of this section nor will it be considered a timely submittal.⁴⁴

Many of the regulations that form the basis for the attainment demonstration have not been submitted to EPA for approval as part of the 2007 PM2.5 plan. Absent actual submission of rules like the statewide heavy-duty truck rule, the DPEA is wrong that the 2007 AQMP demonstrates attainment of the annual PM2.5 standard. The

⁴¹ DPEA, p. 4-1.36.

⁴² DPEA, p. 4.1-19.

⁴³ EPA, Approval and Promulgation of Implementation Plans; State of California; 2007 South Coast State Implementation Plan for 1997 Fine Particulate Matter Standards; 2007 State Strategy; PM2.5, November 8, 2010.

⁴⁴ 40 C.F.R. § 51.281.

1-26
Cont.

proposed federal register notice confirms this position by proposing disapproval of the attainment demonstration.

The DPEA's assumption that the 2007 South Coast Plan will attain the annual PM standard is not supported by substantial evidence on the record. Moreover, the DPEA fails to mention that there will be future PM standards that need to be met, which requires extension of analysis of these impacts. Absent SCAQMD showing that it has an EPA-approved attainment demonstration or that the actual measures committed in the 2007 PM AQMP have been submitted to and approved by the EPA, this assumption renders the PEA inadequate for environmental disclosure purposes under CEQA.

1-27

IV. The SCAQMD Fails to Offer Any Mitigation for this Massive Project

"It is the policy of the state that public agencies should not approve projects as proposed if there are . . . feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects."⁴⁵ The mitigation and alternatives sections are considered "the core" of an EIR.⁴⁶ Moreover, "[a]n adequate EIR must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible."⁴⁷

The DPEA provides one act that it describes as a mitigation measure:

the proposed project includes a cap on total emissions offsets to be provided from the SCAQMD internal accounts...to ensure that the net emissions increase ... do not exceed the emissions analyzed in this PEA.⁴⁸

Basically, the SCAQMD has proposed as "mitigation" to not expand the project more than what it analyzed in the DPEA. To refrain from polluting more than it said it would pollute is not "mitigation." This is especially troubling given that the impacts that the SCAQMD admits will occur are so staggering. None of the harm that the SCAQMD predicts will be lessened or changed in any way by the "mitigation" the District has proposed. Further, again, the failure to properly describe the project causes the SCAQMD to fail to properly develop and apply reasonable mitigation measures. When the "project" is to "adopt Rule 1315" then it is impossible to properly conceptualize appropriate mitigation measures for the project.

The complete failure of the SCAQMD's analysis is highlighted in the following passage:

. . . the regional emissions directly resulting from Proposed Rule 1315 equal the quantity of the Rule 1315 offsets that are used pursuant to Rules 1304 and 1309.1. Thus, any reduction or limitation on the use of the offsets will directly reduce the quantity of regional air pollutant emissions.⁴⁹

While that is true, the project is the *creation and banking* of the credits. The SCAQMD simply cannot have it both ways—to propose a project that creates hundreds

⁴⁵ *Los Angeles Unified School District v. City of Los Angeles* ("LAUSD") (1997) 58 Cal.App.4th 1019, 1028-29 (quoting Pub. Res. Code § 21002); 14 C.C.R. § 15021(a)(2)).

⁴⁶ LAUSD, 58 Cal.App.4th at 1029.

⁴⁷ *Id.*

⁴⁸ DPEA, p. 4.1-59.

⁴⁹ DPEA, p. 4.1-58-59.

1-27
Cont.

of thousands of pounds of emission reduction credits and then analyze the impacts of a subset of what was created based upon some “future baseline” and a completely implausible cap. (A “cap” that will be, as a practical matter, unenforceable by the public since there is no way for the public to track the credits distributed by the SCAQMD. The proposed reporting will come far too late prevent the environmental harm caused by exceeding the “cap”.) The complete implausibility of the “cap” is not speculative, but proven by the SCAQMDs own actions. As the District recited in the DPEA itself, in 2009 legislation that was adopted by the State of California under which “the SCAMQD was required to use internal account offsets” it created and put into its account.⁵⁰ Also in 2009, legislation was adopted “requiring that [certain power plants] be provided with offsets from the SCAQMD’s internal accounts.”⁵¹ The activities of 2009 demonstrate in the starkest possible way that the SCAQMD cannot plausibility say that they can “cap” the emissions credits that will be used.

1-28

Further, the SCAQMD cannot simply limit its analysis to the credits’ use by current 1304 and 1309.1 facilities. As the Los Angeles Superior Court noted in its Decision on this question:

[I]t cannot be doubted that in a world of ever-scarcer emission credits that a huge cache of district-held credits in a now-accessible Priority Reserve will be used. This foreseeable consequence is particularly apparent where, as in this case, the District has articulated a willingness to open the Priority Reserve for uses far removed from the entities who historically could obtain access to those reserves.⁵²

While the SCAQMD has now decided not to include an amended Rule 1309.1 for use by power plants, or adopt a Rule1309.2 to open the bank of credits to any proposed source of air pollution willing to buy credits from the District, it is reasonably foreseeable that revisions would be made to those rules (or completely new rules could be adopted either by the SCAQMD or the legislature) that would draw upon this newly expanded bank of credits. Since *this* project is the creation and banking of credits, the creation and banking is what must be analyzed.

1-29

V. The District Fails to Choose A Feasible Alternative that can Substantially Lessen or Avoid Environmental Effects.

The District has an obligation, under both CEQA’s substantive mandates and to the people who breathe the air in the South Coast Air Basin, to refrain from approving this proposed project when feasible alternatives exist that can substantially lessen or avoid harmful effects. It is for this reason that the alternatives and mitigation analysis have been called “the core” of CEQA’s environmental review process.⁵³

In particular, Section 21002 of the Public Resources Code states:

The Legislature finds and declares that it is the policy of the state that public agencies *should not* approve projects as proposed if there are *feasible*

⁵⁰ The SCAQMD fails to acknowledge that it was the sponsor of the proposed legislation, took a very active role in writing the language of the statute, and that it lobbied heavily for passage of the legislation.

⁵¹ DPEA, p. 2-21.

⁵² 2008 Decision, pp. 8, 12.

⁵³ LAUSD, 58 Cal App.4th at 1029; *County of San Diego v Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal. App. 4th 86, 98.

1-29
Cont.

alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. (emphasis added)

In the Alternatives section of the District's DPEA, the SCAQMD identified five alternatives in addition to the required "no-project" Alternative,⁵⁴ and rejected four Alternatives as "infeasible." Alternatives can function as mitigation for a proposed project when the proposed project's impacts are very difficult to mitigate.⁵⁵

The SCAQMD's proposed project will create at least 222,000 pounds per day of emission reduction credits. While the SCAQMD's analysis has systematically underestimated the true environmental impacts of the foreseeable use of the credits in the South Coast Air Basin and beyond, its analysis still predicts staggering environmental health impacts—including significant levels of death and illness for people living in the South Coast Air Basin—caused by the proposed project. For all practical purposes, the SCAQMD has proposed no mitigation at all for the proposed project. In this type of circumstance, choosing one of the alternatives described in the environmental review document would meet the requirement that an agency refrain from approving a project that has substantial negative impacts on the environment.

1-30

Alternative D is titled "Use of Credits Generated in 2009 and Beyond Only."⁵⁶ As its name suggests, Alternative D is like the proposed project in every way, except it generates and banks only those credits created after 2009.⁵⁷ As the SCAQMD describes it: "[t]he primary effect of implementing Alternative D is that a fewer number of new credits would be available each year after adoption of this alternative compared to the proposed project."⁵⁸ SCAQMD finds that

Alternative D is concluded to be the environmentally superior alternative. Alternative D has the potential to result in substantially lower air quality, health, greenhouse gas impacts for most milestone years than the proposed project and the other project alternatives.⁵⁹

Nowhere in the 513 pages that the SCAQMD devotes to its analysis of the Alternatives is there an explanation of why Alternative D—identified by the SCAQMD as the Environmentally Superior and Least Toxic Alternative—was not recommended as the agency's proposed project. Alternative D meets the project's articulated goals. What it would not do, however, is result in a large surplus of credits in the SCAQMD's internal accounts. As Judge Jones observed, it is a strange delusion to imagine that, when credits are scarce or expensive on the open market, credits held in the SCAQMD's internal bank would remain unused. The actions of both the SCAQMD and of Power plant lobbyists have already demonstrated how easily the SCAQMD's

⁵⁴ See, generally, DPEA Chapter 6.

⁵⁵ See, e.g., *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal 3d 376, 403 ("alternatives and mitigation measures have the same function—diminishing or avoiding adverse environmental effects").

⁵⁶ The analysis of all the alternatives is negatively by all of the shortcomings discussed in this letter, however, as compared to the proposed project. Alternative D has significantly fewer impacts.

⁵⁷ DPEA, p. 7-43.

⁵⁸ *Id.*

⁵⁹ DPEA, p. 6-147.

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rules limiting access can be overridden with timely lobbying in Sacramento. The only honest and lawful approach to this project is to consider the impact of creating the entire pool of credits. The only way to mitigate that pool is to shrink the pool. Alternative D does exactly that, by limiting the generation emissions reductions that occurred in 2009 and beyond.

On behalf of Communities for a Better Environment, Natural Resources Defense Council, California Communities Against Toxics and Coalition for a Safe Environment, we thank you for considering these comments. Please do not hesitate to contact us if you have any questions.

Sincerely,

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/s/
Angela Johnson Meszaros on behalf of

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Exhibit List⁶⁰

South Coast Air Quality Management District, Final Program Environmental Assessment for Proposed Amended Rule 1309.1—Priority Reserve, and Re-adopting of Rule 1315, July 10, 2007.

Comments on Draft Program Environmental Assessment for Proposed Amended Rule 1309.1 – Priority Reserve and Proposed Re-adopted Rule 1315 – Federal New Source Tracking System, June 29, 2007.

EPA, Approval and Promulgation of Implementation Plans; State of California; 2007 South Coast State Implementation Plan for 1997 Fine Particulate Matter Standards; 2007 State Strategy; PM2.5, November 8, 2010.

Staff Report, Draft Program Environmental Assessment for Re-adoption of Proposed Rule 1315—Federal New Source Review Tracking System, Sept. 9, 2010.

Judge Ann I. Jones, Decision on Ruling on Respondent's Motion for Summary Adjudication, BS 110792, July 29, 2008.

Studies

Air Resources Board, Recent Research Findings: Health Effects of Particulate Matter and Ozone Air Pollution, January 2004
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⁶⁰ All documents from the previous administrative and judicial proceedings are equally available to the District, and presumed to be in the record for this matter. The studies cited herein are publicly available, and by reference are made part of this administrative record. To the extent you would like to be provided with electronic or hard copies, please do not hesitate to contact us.

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COMMENT LETTER #1

**CALIFORNIA COMMUNITIES AGAINST TOXICS
COALITION FOR A SAFE ENVIRONMENT
COMMUNITIES FOR A BETTER ENVIRONMENT
NATURAL RESOURCE DEFENSE COUNCIL**

November 10, 2010

Time for comments on the Draft PEA and provision of responses. Responses to Comment 1-1 and 1-2

The introductory paragraph of the comment letter identifies the environmental organizations who submitted comment letter No. 1 on the Draft Program Environmental Assessment (PEA).

The comment requests that the SCAQMD respond to all “comments and objections” in the Final PEA. Specific responses to the comments in this comment letter have been prepared by SCAQMD staff and are set forth below. The responses are generally organized by topic and references to the particular comments being responded to are provided.

Footnote #2 in the comment letter notes that the SCAQMD granted a two-week extension to comment on the Draft PEA, and states that granting a longer extension would have been reasonable. The Draft PEA was released and made available to the public on September 9, 2010, with the comment period scheduled to close on October 26, 2010. On October 11, 2010, the commenters requested an extension of 28 days until November 23, 2010. To accommodate the request for additional time, while balancing desires of other members of the public for the SCAQMD to take prompt action on Proposed Rule 1315, SCAQMD extended the comment period to November 9, 2010, which provided a total of 62 days for comment on the Draft PEA.

Overall comments about the health impacts of the rule, mitigation measures and alternatives. Responses to Comment 1-3

The comment raises concerns regarding the significant adverse health impacts associated with project-related emissions, and argues that the negative health and environmental effects of the proposed project are unique.

The Draft PEA clearly recognizes that there is a relationship between the emissions from sources receiving permits in reliance on the SCAQMD’s internal offset accounts and health effects. The Draft PEA assumes that if Proposed Rule 1315 is not adopted, then the sources that would otherwise be expected to receive permits in reliance on offsets in the SCAQMD’s internal offset accounts over the next 20 years would not be permitted, and the emissions expected to result from those permits would not occur. This assumption extends to all such sources, including new and modified sources that would replace existing sources that close down or reduce emissions as well as new and modified sources that reflect regional growth. By including a detailed analysis assessing the health effects associated with such emissions, the Draft PEA fulfills its role as an informational document that will inform public agency decision makers and the public of the significant environmental effects of the project.

The comment objects to the fact that the Draft PEA did not recommend Alternative D even though it would result in substantially lower air quality, health and greenhouse gas emissions than the proposed project. The ultimate decision regarding whether to approve the proposed project, one of the alternatives, or take other action relating to the proposed rule rests with the decision-making body, the SCAQMD Governing Board. Additional information relating to Alternative D is provided in the Responses to Comment 1-11.

The statement in Comment 1-3 indicating that no mitigation has been proposed to reduce impacts from the proposed project is responded to along with the other comments relating to mitigation, below in the Responses to Comment 1-27.

Introductory summary of comments. Responses to Comment 1-4

Comment 1-4 summarizes the comments in the comment letter. The issues summarized in Comment 1-4 are addressed in the responses to the following comments:

Scope and impact of the proposed project: Responses to Comments 1-9, 1-10, 1-12, 1-18, 1-19, 1-20, and 1-21.

Clarity of the project description: Responses to Comments 1-6, 1-7, 1-8, 1-12, 1-13, 1-15, 1-16, and 1-17.

Use of a “future baseline” to analyze the project’s air pollution impacts: Responses to Comment 1-24.

Project description’s treatment of offset creation and banking: Responses to Comments 1-9 and 1-10.

Relationship between creation and banking of offsets and the impacts of the proposed project: Responses to Comments 1-18, 1-19 and 1-20.

Requirements of the Superior Court’s ruling relating to the impact analysis: Responses to Comments 1-18, 1-19 and 1-20.

The mitigation for the impacts of the proposed project: Responses to Comment 1-27.

The quantity of offsets that will be credited to the internal accounts: Responses to Comments 1-9, 1-10 and 1-12.

Potential to expand offset use beyond the level analyzed in the Draft PEA: Responses to Comments 1-23 and 1-28.

Alternatives to the proposed project: Responses to Comments 1-11, 1-29 and 1-30.

Effect of banking “retroactive” offsets: Responses to Comment 1-14.

**Legal adequacy of Draft PEA, the CEQA process and the rulemaking procedure.
Responses to Comment 1-5**

Legal adequacy of the Draft PEA. The comment expresses the view that the Draft PEA is substantively inadequate. The SCAQMD Governing Board will be responsible for determining whether to certify the PEA. That determination will be made based upon the information in the Draft PEA, combined with the Responses to Comments on the Draft PEA and changes and corrections made to the Draft PEA in the Final PEA. It is SCAQMD staff's objective to complete a PEA that fully complies with all relevant substantive and procedural CEQA requirements. The PEA's analysis of environmental impacts related to the proposed project is detailed, comprehensive, and employs conservative assumptions to ensure that impacts are not understated. The PEA serves its purpose as an informational document by providing the public and decision-makers with a technically sound discussion and analysis of environmental impacts related to the proposed project.

Differences between prior rule and proposed rule The comment maintains that the SCAQMD is seeking to adopt a rule with the "exact same pollution generation provisions as the rule adopted in 2006." (Comment 1-5) The Proposed Rule 1315, like the prior version of Rule 1315 that was rescinded in response to the Superior Court's decision, is being promulgated in response to a request from U.S. EPA that the SCAQMD describe its internal offset tracking system in a formally adopted rule. There are several important distinctions between Proposed Rule 1315 and the rule adopted in 2006.

One key difference is the inclusion of backstop provisions in the rule, which will limit the issuance of offsets from the SCAQMD internal accounts so that emissions from sources relying on internal offsets cannot exceed cumulative net emission increase thresholds. This assures that emissions from the project will not exceed the amount analyzed in the PEA. See Responses to Comment 1-27 for a detailed discussion of the backstop provisions of the proposed rule. Furthermore, under the previously adopted version of Rule 1315, many more categories of sources would have been able to access offsets from the internal offset accounts pursuant to two rules that have since been rescinded: former Rule 1309.2, which provided access to a wide range of new and modified sources, and the former power plant amendments to Rule 1309.1 which provided access to large power plants. Because these rules have been rescinded, these sources will not be able to access the SCAQMD's internal offset accounts under Proposed Rule 1315. See Responses to Comments 1-18, 1-19 and 1-20 for a further discussion.

In addition, Proposed Rule 1315 substantially strengthens federal equivalency provisions. It would require that the Executive Officer immediately discontinue issuing permits for major sources for any pollutant for which a final determination of equivalency shows a shortfall. Proposed Rule 1315 would also require the Executive Officer to annually prepare a projection of cumulative emission increases for the next two years. If these projections indicate that a shortfall will exist, the Executive Officer would be required to prepare a report to the Governing Board recommending specific action to rectify the shortfall, thus making it highly unlikely that an actual shortfall would ever occur. Neither of these provisions was included in the previously-adopted rule.

The rule development and environmental review process. The rule promulgation and environmental review processes have been open and fully transparent since the SCAQMD began working on a new proposed rule in response to the decision of the Los Angeles Superior Court that set aside the previously adopted version of Rule 1315. SCAQMD staff prepared a Notice of Preparation and Initial Study for Proposed Rule 1315 that was circulated for a 30-day review period beginning on March 17, 2009. Four comment letters were received on the NOP/IS and responses to those comments were prepared. The authors of the comment letter did not provide any written comments on the NOP/IS. In addition, a joint scoping meeting for the Environmental Assessment and public consultation on the proposed rule was held on April 8, 2009, at which time the public was invited to comment on the scope and contents of the environmental assessment and on Proposed Rule 1315. Thirty-one interested parties attended the scoping and public consultation meeting. Further, a public workshop on Proposed Rule 1315 was held on September 22, 2010, with 25 interested parties attending. Copies of the proposed rule, staff report and the Draft PEA were available at the public workshop. The Draft PEA was circulated for public review and comment for a total of 62 days. Once the Final PEA is completed it will be considered for certification, and Rule 1315 will be considered for approval, at a noticed public hearing which will provide a further opportunity for public participation.

Release of the Notice of Preparation/Initial Study and release of the Draft PEA were accompanied by extensive notice to the public and interested agencies, which included: mailing hardcopies of the Draft PEA to interested parties, e-mailing notices of completion to a large list of interested parties, and providing notice of the availability of the Draft PEA in the Los Angeles Times. Over 1,200 e-mail notices were sent to county clerks, city planners, government agencies, citizen groups, fire departments, school districts, transit agencies, forestry agencies, Native American groups, and interested parties including attendees to the consultation meeting and scoping meeting. Copies of the Draft PEA were also submitted to the State Clearinghouse for distribution to state agencies. Further, the complete Draft PEA was made immediately available online for downloading, hardcopy and cd-rom versions were available at the SCAQMD Public Information Center, and, consistent with past procedures, offered to be mailed for free.

The comment relating to SCAQMD decisionmaking on the proposed project and the alternatives is discussed in the Responses to Comments 1-11, 1-29 and 1-30 below, and the comment on mitigation measures is discussed in Responses to Comment 1-27, below.

General comments relating to adequacy of the project description and statement of objectives. Responses to Comments 1-6, 1-7 and 1-8.

Compliance with the requirements of CEQA. The comment letter summarizes CEQA requirements relating to an environmental impact report's project description and statement of objectives (Comment 1-6), and asserts that the project description "fails to provide necessary substantive information as required by CEQA." (Comment 1-7). The necessary substantive information required by CEQA is provided. The project that is proposed for consideration by the SCAQMD Governing Board is adoption of Proposed Rule 1315. The Draft PEA's project description provides a comprehensive and detailed description of all of the components of Proposed Rule 1315 that are relevant to its potential environmental impacts. The comments do not identify any substantive information required by CEQA that has been omitted from the project description and the project description chapter of the Draft PEA contains all of the

elements of a project description identified in CEQA Guidelines §15124, including the following: providing the location of the proposed project, statement of objectives, general description of the proposed project, project background, permits and approvals, together with a discussion of other issues relevant to the project description. A “statement briefly describing the intended uses of the EIR” can be found in Chapter 1.

Content of project description. The comment letter also indicates that describing the proposed project as “adopting a revised version of Rule 1315” does not contain the content needed for decision making. (Comment 1-8) It should be recognized, however, that the description of the proposed project is amplified by a detailed discussion and explanation of each element of the proposed rule. (Draft PEA at pages 2-12 through 2-19.) In addition, to put the project description in context, the project description chapter of the Draft PEA includes a detailed background section that describes relevant legal requirements relating to New Source Review permitting and offset requirements, a summary of SCAQMD’s New Source Review permitting program, and the history of the SCAQMD’s offset tracking system, including the events leading to the current proposal to adopt a revised version of Rule 1315.

Quantification of offsets that would be banked under Proposed Rule 1315. Responses to Comments 1-9, 1-10.

The comment letter asserts that the proposed project would result in the “creation and banking” of “at least 220,000 pounds per day of air pollution emission reductions” (Comment 1-9) The commenter states this is a figure derived from numbers in the SCAQMD’s 2007 PEA. (See Comment Letter 1, footnote 4) The comment contends that the project description should include the quantity of offsets that would be “banked” under Rule 1315, and that the project description should emphasize that the proposed rule would result in both retrospective and prospective “creation and banking” of offsets. Comment 1-9. The comment letter further contends that quantification of these offsets is necessary in order to measure the size and scope of the proposed project. Comment 1-10. These contentions are repeated in several other comments. See Comments 1-4, 1-11, 1-17, 1-18, 1-19, 1-20, 1-21, 1-23, 1-24, 1-27, 1-28, and 1-29.

First, it should be noted that the proposed project would not “create” emissions reductions. Rule 1315 provides for tracking emissions reductions in SCAQMD’s internal accounts and their use as offsets in accordance with Rules 1304 and 1309.1.

Quantification of the offsets that would be tracked in SCAQMD’s internal accounts under Rule 1315 is not necessary to an adequate description of the proposed project or to an adequate analysis of its impacts. The comments on this topic are premised on the assumption that the quantity of emissions that would result from the proposed project, and therefore the air quality impacts of the proposed project, would be equivalent to the quantity of emissions reductions tracked in the SCAQMD’s internal accounts under Rule 1315. This assumption is incorrect for three reasons. First, as explained in the Responses to Comments 1-19 and 1-20, the Rule 1315 tracking system would only result in emissions to the extent emission reductions tracked under Rule 1315 are used as offsets for permits issued under Rules 1304 and 1309.1. As explained in Responses to Comment 1-13, the emissions analysis in the Draft PEA, which is based on

forecasted emissions attributable to sources projected to be permitted under Rules 1304 and 1309.1, provides the most accurate and reliable forecast of actual project-related impacts.

Second, as is explained in the Responses to Comments 1-18, 1-19 and 1-20, emission reductions tracked under Proposed Rule 1315 would not translate to an equivalent amount of offsets that would then be used as emissions offsets for new permits and there is no direct correlation as assumed by the comment. Furthermore, as is explained in the Responses to Comment 1-27, the CEQA Backstop provisions of Proposed Rule 1315, by limiting emissions, would ensure that future emissions due to the proposed project would not exceed the emissions forecasts made in the PEA.

It should also be noted that Chapter 8 of the Draft PEA includes a description and analysis of a “maximum use scenario” that analyzes a hypothetical scenario under which all the offsets in the SCAQMD’s internal accounts calculated as of December 31, 2006 would be used over the 20-year life of the proposed project. (Draft PEA 8.0-7). This analysis was completed even though, as is explained in Chapter 8, the SCAQMD has never experienced a situation in which all the offsets in the account are used.

The commenters have estimated that the project will result in at least 220,000 pounds per day of emission offsets being “created.” This translates to 111 tons per day (of all pollutants together). However, some of those offsets have already been used to support permits that were previously supported by pre-1990 offsets and other offsets that the SCAQMD has retroactively removed from its accounts. See Responses to Comment 1-16. Only those offsets that remain in the accounts after supporting the previously-issued permits can be used to support new permits resulting in increased emissions.

Consideration of alternatives to the proposed project. Responses to Comments 1-11, 1-29, 1-30.

The comment letter states that the SCAQMD’s emphasis on proposing a rule that is a revised version of prior Rule 1315, rather than an environmentally superior alternative, indicates that “SCAQMD’s real goal is to adopt essentially the same Rule it adopted in 2006” regardless of the environmental impacts. Comment 1-11. To the extent the comment is premised on the assumption that the effects of Proposed Rule 1315 would be the same as the 2006 and 2007 version of Rule 1315, the comment is misplaced. Proposed Rule 1315 is very different from prior Rule 1315 in several important respects. See Responses to Comment 1-5.

The Draft PEA eliminated four potential alternatives from detailed consideration on various grounds, including infeasibility. See Draft PEA pages 6-1 through 6-6. It then goes on to analyze in detail five alternatives, including the No Project alternative. None of these alternatives is rejected by the Draft PEA. In addition, it is incorrect to assume, as does this comment and several other comments (see Comments 1-3, 1-5, 1-13, 1-29 and 1-30) that the SCAQMD has predetermined to adopt Proposed Rule 1315, or to adopt such a rule in the form recommended by staff. The Draft PEA contains a range of alternatives to the proposed project, and each alternative will be considered on its merits by the SCAQMD Governing Board. The ultimate decision whether to approve the proposed project, adopt an alternative, or take other action will be up to the SCAQMD Governing Board.

Another comment refers to general CEQA requirements and states that the Draft PEA fails to choose a feasible alternative that reduces impacts, and contends that choosing one of the alternatives would meet the requirement to refrain from adopting a project with substantial environmental impacts. See Comment 1-29. However, it is not the function of the Draft PEA to accept or reject the proposed project or the alternatives to the proposed project. Rather, the function the Draft PEA is to evaluate the proposed project and alternatives to it in order to provide relevant environmental information to the public and the decision-makers. As noted above, the ultimate decision relating to what action to take on the proposed project and the alternatives is up to the SCAQMD Governing Board.

A related comment asserts that there is no explanation why Alternative D was not proposed in the Draft PEA as the recommended project. See Comment 1-30. Chapter 6 of the Draft PEA identifies Alternative D as the environmentally superior alternative, as required by CEQA Guidelines §15126.6 (e)(2). Chapter 6 of the Draft PEA also identifies the least toxic alternative, which is also alternative D. The ultimate decision regarding whether or not to approve the proposed project, one of the alternatives, or take some other action rests with the SCAQMD Governing Board. See response to comment 1-30 for a further discussion of Alternative D.

The second paragraph in Comment 1-11 relating to the methodology used in the impact analysis, is addressed below in the Responses to Comments 1-18 and 1-19.

Exclusion of SB 827 and AB 1318 sources from the project. Responses to Comment 1-12.

The comment letter suggests that emissions associated with permits issued under SB 827 and AB 1318 should be treated as emissions resulting from the proposed project. However, the permits issued under SB 827 and AB 1318 were not issued as a result of Proposed Rule 1315. Those permits exist, and will continue to exist, regardless of whether Rule 1315 is adopted. As a result, permits issued under SB 827 and AB 1318 are not part of the proposed project because the use of offsets from the SCAQMD's internal offset accounts for those permits was independent of Proposed Rule 1315, and did not depend in any way upon adoption of Proposed Rule 1315. However, emissions from SB 827 projects and AB 1318 (Sentinel power plant) are included in the cumulative impacts analysis.

As noted in the comment letter, the Draft PEA's quantification of emissions attributable to the proposed project does include a relatively small quantity of emissions that are actually attributable to sources that would be permitted under SB 827 after June 2010 and before adoption of Rule 1315. During the preparation of the Draft PEA, July 2010 was used as the projected start date for implementation of Proposed Rule 1315 in the event of its adoption. The impact analysis in the Draft PEA accordingly assumes that all permits projected to be issued under Rules 1304 and 1309.1 after July 2010 would rely on offsets tracked under new Rule 1315. Completion of the PEA has taken longer than was originally anticipated. The impacts the Draft PEA attributes to Proposed Rule 1315 are therefore overstated for the period that the SCAQMD continues to issue permits under the provisions of SB 827, since those permits are not actually issued in reliance on Proposed Rule 1315, although they were assumed to be in the Draft PEA. As discussed in the Draft PEA, the use of the July 2010 start date results in a relatively small over-estimate of the impacts of the proposed project and therefore does not understate the effects of the proposed project.

Relationship between the proposed project and regional growth. Responses to Comment 1-13.

The comment letter indicates that there is an inconsistency between the project description, which states that Proposed Rule 1315 will accommodate population growth, and the baseline discussion, which, according to the comment, “assumes the project will...effect this growth.” There is no inconsistency. As growth within the region occurs, essential public services in the region will have to be expanded and modernized to serve that growth; the proposed project will allow these essential public services to obtain the emissions permits needed for expansion and modernization. Similarly, the proposed project will allow sources that qualify for exemptions to obtain necessary emissions permits. The Draft PEA assumes that without the project, permits would not be issued under Rules 1309.1 and 1304, none of these sources would be constructed and operated, and the emissions attributable to those facilities would not occur. In addition, the Draft PEA also recognizes that growth within the region would, as a result, be constrained if these sources cannot be permitted under Rule 1309.1 and Rule 1304.

The comment letter asserts, without explanation, that population growth does not necessarily translate into emission increases. It is undisputed, however, that public services and economic activity must expand with population growth. Essential public services such as water, sewer, police, fire, waste disposal, and hospitals, will need to expand in response to population growth. The sectors of the economy that provide the goods, services and jobs needed by the increased population will also have to expand. Expansion in these areas will in turn result in the emissions associated with the new and modified sources in the new and expanded facilities.

The emissions attributable to emissions sources at such new and expanded facilities are reflected in the AQMP emissions projections, which is the best available information about the emissions forecasted to result from growth. It is correct that, due to the beneficial effect of pollution control rules and regulations in reducing emissions over time, growth does not necessarily translate to a proportionate increase in regional emissions in comparison with current conditions. That is, there would be more emissions with growth than without growth, but—due to effects of other changes occurring over the same period as the growth occurs—the net change in regional emissions over time may or may not result in an overall increase in emissions. However, it is also true that if growth in the region is reduced, emissions would also decline, and so future emissions with growth will be greater than future emissions without growth.

The emissions forecasts in the 2007 AQMP include all emissions projections for existing and new and expanded sources in the district, including those that would be approved in the future under Rules 1304 and 1309.1. The analysis in the Draft PEA accordingly reflects the fact that if the proposed project is not approved, no new or expanded sources would be approved under Rules 1304 or 1309.1, and the emissions forecasted for those sources in the 2007 AQMP would not occur. In addition, the social and economic effects that would result from the inability of essential public services in the region to modernize and expand, and for sectors of the economy that provide goods, services and jobs to expand, would in turn affect population and economic growth in the region.

It should also be recognized that new and modified equipment is required to use Best Available Control Technology (BACT) pursuant to Rule 1303. Application of BACT ensures that the

source uses the cleanest equipment available. Further, as existing businesses within the region cease operations over time and are replaced, the application of BACT will increase within the region. This will result in fewer emissions per unit of production than continuing to operate existing equipment that does not employ BACT. Use of the Priority Reserve pursuant to Rule 1309.1 and of the offset exemptions in Rule 1304 significantly helps this process occur; without the continued ability for facilities to obtain offsets from SCAQMD's internal offset accounts, the replacement of older, high-emitting sources with newer, BACT-equipped sources would be drastically slowed.

**Compatibility of use of existing emissions reductions as offsets with the Clean Air Act.
Responses to Comment 1-14.**

The comment letter indicates that tracking past emissions reductions associated with pollution that has not been in the air going back to 1990, violates the federal and state Clean Air Acts. This comment does not address the physical environmental effects that would result from the use of such offsets, which have been disclosed in the PEA. The Draft PEA fully evaluates those environmental impacts because it treats emissions from sources that would rely on offsets tracked under Rule 1315 as new emissions that would not occur in the absence of Rule 1315.

No authority is cited for the proposition that use of previously existing emissions reductions would violate the Clean Air Act. Further, EPA has rejected the petition the commenters filed with the EPA (Letter dated September 23, 2010, from Lisa P. Jackson, EPA Administrator, to commentators Adriano Martinez (NRDC), Shana Lazerow (CBE) and Angela Johnson-Meszaros). On page 7 of its letter, EPA makes clear that it knew the SCAQMD proposed to use "certain post-1990 surplus reductions (i.e. minor source orphan shutdowns) for which, due to the large sum of credits in its offsets accounts, SCAQMD had not previously accounted". The EPA Administrator concluded, "The offsets from minor orphan shutdowns, therefore, meet the requirements of 40 C.F.R. 51.165(a)(3)(C)(1)(i), and I have found nothing in Regulation XIII that would preclude the SCAQMD from using these offsets to demonstrate equivalency with federal NSR requirements." (Jackson Letter, page 11) Thus EPA does not agree that the use of previously-existing emissions reductions violates the Clean Air Act.

The comment letter also states that the "creation and distribution of credits" does not "contribute to the SCAQMD's mandate to encourage economic growth based on cleaner technologies, such as alternative fuels," citing Health & Safety Code §40440(b). This comment appears to reflect a policy concern, rather than a critique of the PEA's analysis of the project's physical environmental effects. In any case, the SCAQMD's rules require the cleanest possible fuels and most advanced control technology for all new and modified sources, including those that are permitted in reliance upon offsets in the SCAQMD's internal accounts. Rule 1303(a)(1) requires all new and modified sources resulting in an emissions increase to use Best Available Control Technology (BACT). In implementing this requirement, the SCAQMD requires the use of the cleanest available fuel, which in most cases is natural gas, and the SCAQMD also requires the most advanced pollution controls to be used to further reduce emissions from those fuels, such as selective catalytic reduction for NOx.

In addition, the SCAQMD encourages development of the cleanest possible alternative fuels as part of its Clean Fuels Program, which receives funds from a vehicle registration fee and from an

emissions fee surcharge on stationary sources. Health & Safety Code §40514. These fees are used, among other things to promote renewable and alternative energy projects, such as solar roof projects.

The comment letter recognizes that “the SCAQMD indeed must plan to accommodate the population growth predicted in the AQMP.” However, the comment notes that this must be done in compliance with state and federal Clean Air Act requirements, and quotes the Draft PEA as saying that “It is possible that, without the project, attainment of the ozone and particulate matter NAAQS and CAAQS could occur at an earlier date than under the conditions of the proposed project.” (citing the Draft PEA, 1-10). The comment omits the immediately following two sentences in the Draft PEA, which state: “However, for several reasons, it cannot be determined whether the without project scenario would in fact achieve attainment at an earlier date than under the proposed project, and if so when. These reasons include the long-term nature of the control measures needed to reduce ozone and PM levels; and the relatively small amount that the project would contribute to ozone concentrations (from 0.5 to 2.9 ppb) PM_{2.5} concentrations (from 0.01 to 1.6 micrograms per cubic meter) and PM₁₀ concentrations (from 0.01 to 2.5 micrograms per cubic meter.)” (Draft PEA, 1-10 to 1.11).

Nevertheless, the Draft PEA discloses that “emissions attributable to the proposed project are considered to result in a significant air quality impact because the emissions will exceed the applicable operational significance threshold for each of the following criteria pollutants: VOC, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}.” (Draft PEA, 1-9). The Draft PEA also identifies the health risks associated with the emissions, and concludes those risks are significant. The Draft PEA further acknowledges that accommodating the population growth predicted in the AQMP results in significant, adverse environmental effects compared to conditions without the project, which would constrain growth. For a further discussion of the relationship between the proposed project and regional growth, see Responses to Comment 1-13.

Project objective relating to credit accounting procedures. Responses to Comment 1-15

The comment letter asserts that the use of the word “memorializing” in the statement of project objectives regarding the SCAQMD’s accounting procedures implies that the SCAQMD is not changing its past practices, and does not explain that the SCAQMD is using new ways to “generate” offsets. Comment 1-15. However, this comment ignores the fact that the project objectives also state that one of the purposes of the project is to “Recognize sufficient previously-unused emission reductions that are beyond those required by applicable regulatory requirements in order to demonstrate federal equivalency for major sources that are exempt under Rule 1304 or that are allocated credits from the Priority Reserve under Rule 1309.1.” (Draft PEA 2-20). The fact that the project objectives describes these reductions as “previously-unused” makes clear the fact that these are types of reductions that were not used in the SCAQMD’s prior uncodified accounting system. Furthermore, other aspects of the project description also makes this clear. The Draft PEA states: “The proposed rule would provide for the use of certain types of offsets that previously had not been accounted for in the SCAQMD’s federal tracking system.” (Draft PEA 2-13) The project description goes on to identify which types of offsets had not previously been accounted for in federal tracking in footnote 14, page 2-13.

Project objective relating to recognition of previously unused emissions reductions as offsets. Responses to Comment 1-16.

The comment letter asserts that the third project objective is misleading because it suggests that the project would recognize only enough previously-unused emission reductions to show federal equivalency, when the project would create “new” credits. This is an incorrect characterization of the third project objective, which is to “Recognize sufficient previously-unused emission reductions that are beyond those required by applicable regulatory requirements in order to demonstrate federal equivalency for major sources that are exempt under Rule 1304 or that obtain credits from the Priority Reserve under Rule 1309.1.” This objective in no way limits the tracking of previously-unused emission reductions to the amounts needed to demonstrate federal equivalency and no more. Furthermore, as discussed in Responses to Comment 1-15, both this project objective and other aspects of the project description in the Draft PEA make it clear that, if the Proposed Rule is adopted, the SCAQMD will be using certain types of emission reductions that had not previously been accounted for. However, the emissions reductions that would be accounted for have always existed and in that sense are not “new;” the change is that under Proposed Rule 1315 they would be tracked in the SCAQMD’s internal accounts for use as offsets.

Further, the comment letter asserts that the U.S. EPA found the SCAQMD had “violated federal law” by relying on certain offset credits, and that under the proposed rule, SCAQMD will be accounting for reductions in amounts far in excess of what would be required to replace those credits. First, the U.S. EPA did not find that the SCAQMD had relied on credits in violation of federal law. Instead, the SCAQMD agreed with EPA to remove from its internal offset accounts certain pre-1990 offsets for which the SCAQMD no longer had adequate documentation, and also agreed to remove offsets derived from Best Available Control Technology discounting of emission reductions used to generate Emission Reduction Credits¹. Further, SCAQMD agreed to retire all remaining valid pre-1990 offsets (33.45 tons per day overall, and 4.52 tons per day of NOx) as of the end of calendar year 2005.

Table J-1 summarizes the quantities of removed offsets and of newly tracked offsets through the end of the 2001-2002 reporting period (July 31, 2002). Table J-1 shows that the quantities removed exceed the newly tracked quantities overall and for four of the five individually tracked air contaminants.

¹ The portion of CO offsets that satisfy the requirements of PR 1315(c)(3)(A)(vi) are excluded. The SCAQMD agreed to remove these credits even though U.S. EPA had previously approved such BACT discounting as a source of offsets to the internal offset accounts. U.S. EPA Region IX Air & Toxics Division, “Technical Support Document for EPA’s Notice of Final Rulemaking for the California State Implementation Plan South Coast Air Quality Management District New Source Review,” Gerardo C. Rios, October 24, 1996, page 17.

Table J-1

Previously Tracked Offsets Removed from SCAQMD’s Internal Offset Accounts and Newly Tracked Credits Added to SCAQMD’s Internal Offset Accounts through July 2002 (tons per day)

	VOC	NOx	Sox	CO	PM10	Overall
Pre-1990 Offsets removed due to lack of records*	-53.95	-1.88	-10.36	-26.45	-31.83	-124.47
BACT discount of ERCs offsets removed	-12.14	-4.50	-0.12	-3.08	-4.15	-23.99
Newly Tracked Credits	40.35	15.06	2.59	12.24	12.91	83.15

* Does not include remaining unused pre-1990 offsets that were removed after the calendar year 2005 reporting period.

Discussion of tracking for purpose of State NNI requirements. Responses to Comment 1-17.

Comment 1-17 asserts there is a conflict between the discussion on page 1-4 and the discussion on page 2-13 regarding the types of emission reductions that will be credited to SCAQMD’s internal accounts under Proposed Rule 1315. The comment does not correctly characterize the cited text on page 1-4 in the Draft PEA. Page 1-4 states “ The proposed rule would provide for the use of certain types of offsets that, prior to the initial adoption of Rule 1315 in 2006, had not been accounted for in the SCAQMD’s federal tracking system.” (Draft PEA, 1-4) This statement is consistent with the statement, cited by the comment, that “Many, but not all, of the sources of offset credits that had not previously been accounted for in federal tracking were previously tracked for purposes of demonstrating California “No Net Increase” (NNI) requirements.” (Draft PEA 2-13, footnote 14) The specific types of emissions reductions that were not previously tracked for federal purposes are then listed.

With regard to the project objectives, please refer to Responses to Comment 1-13. With regard to the project description, please refer to Responses to Comments 1-7, 1-8, and 1-10. With regard to the baseline for environmental analysis, please refer to Responses to Comment 1-24. With regard to the year 2030 sunset date, please refer to Responses to Comment 19.

Scope of impact analysis and methodology for forecasting impacts. Responses to Comments 1-18, 1-19 and 1-20.

The comment letter criticizes the Draft PEA’s impact analysis suggesting that it should have analyzed and described the impacts of “creation and banking” offsets under Proposed Rule 1315 rather than the projected use of those offsets. (Comment 1-19) It contends that the Draft PEA’s impact analysis incorrectly focuses on “how many credits will be distributed rather than

generated,” and this “minimizes” and “underestimates” the project’s impacts. (Comment 1-18) The comment letter objects to the methodology used in the Draft PEA for forecasting project-related emissions because it is based on projected use of offsets under Rules 1304 and 1309.1 rather than the total quantity of offsets that would be tracked. (Comment 1-19) The comment letter supports this by arguing that it is “reasonably foreseeable” that once offsets are banked, they will all necessarily be used, and an equivalent amount of air pollution will result. (Comment 1-19); other comments raise the same issue, see Comment 1-4, ¶2; Comment 1-11, ¶2, Comment 1-27.

Analytical basis for using emissions forecasts for permits projected to be issued under Rules 1304 and 1309.1. The analysis in the Draft PEA recognizes that offsets tracked under Rule 1315 would result in emissions only if and when they are used to support permit issuance and debited from the internal accounts created by Rule 1315. Under Proposed Rule 1315, potential offsets identified under the Rule’s tracking system will only be drawn on for permits issued under Rules 1304 and 1309.1. For this reason, the Draft PEA’s forecasts of emissions attributable to Rule 1315 are based upon projections of emissions from sources that would receive permits under either Rule 1304 or Rule 1309.1 in the future if Proposed Rule 1315 is adopted.

The effect of Rule 1315 cannot be severed from Rules 1304 and 1309.1 as proposed by the commenter because Rule 1315 is designed to provide the ability for the SCAQMD to issue permits under Rules 1304 and 1309.1, and Rule 1315 has no function that would result in emissions independent of Rules 1304 and 1309.1. Rule 1315 provides for tracking of emissions reductions in an internal offset account created to allow permits to be issued to sources that are exempt from offset requirements under Rule 1304 or that are entitled to receive offsets from the internal accounts under Rule 1309.1. This means that the only sources that will be permitted based on offsets tracked under Rule 1315 are sources that qualify for a permit issued under either Rule 1304 or Rule 1309.1.

This limitation is fundamental to Rule 1315. A stated purpose of the proposed rule 1315 is to “[m]aintain the SCAQMD’s ability to continue to issue permits to major sources that obtain offset credits from the Priority Reserve under Rule 1309.1 and/or that are exempt from offsets under Rule 1304 through December 31, 2030.” Proposed Rule 1315(a)(1). The proposed rule would accomplish this objective by: (1) setting forth the procedures the SCAQMD will follow for meeting federal NSR offset requirements for major sources that are exempt from offsets under Rule 1304 or that obtain offset credits from the Priority Reserve under Rule 1309.1; and (2) specifying that debits shall be made in the SCAQMD’s internal offset accounts for emissions offsets used pursuant to Rule 1309.1 and exemptions pursuant to Rule 1304. Proposed Rules 1315(a)(2) and (c)(2).

Proposed Rule 1315 thus describes the procedures the SCAQMD would follow to account for offsets that would enable Rules 1304 and 1309.1 to be implemented: For Rule 1309.1, it does so by providing the means for sources that qualify under Rule 1309.1 to obtain offsets as contemplated by that Rule; for Rule 1304, it does so by ensuring that offsets will be available to meet offset requirements applicable to sources that qualify for exemption under Rule 1304. In light of the foregoing, the analysis in the Draft PEA is predicated on the fact that emissions attributable to offsets tracked under Rule 1315 would be equal to the emissions that would result from sources permitted under Rules 1304 and 1309.1.

Contrary to the statements in the comment letter, this methodology does not underestimate emissions that would result from approval of the project. Emissions from sources that might receive permits under rules other than Rule 1304 and 1309.1 would have no causal connection to adoption of Rule 1315 because any such sources would not be exempt from offset requirements and would not be eligible to use offsets in the SCAQMD's internal offset accounts.

With respect to comments that the scope of the project may change in the future, see Responses to Comment 23.

Suggestion that emissions be estimated based on offsets tracked rather than offsets used. While the comment suggests that the impact analysis should have based its forecasts of future pollution attributed to Rule 1315 on estimates of the total amount of offsets that would be tracked in the SCAQMD's internal offset accounts, such an approach would give an inaccurate and misleading depiction of the actual impacts associated with adoption of Proposed Rule 1315. The limitations discussed above are integral to Rule 1315. An impact analysis predicated on the hypothetical assumption that all offsets that are tracked will result in a commensurate level of emissions would be inconsistent with the purpose and effect of Proposed Rule 1315 and with the specific limitations built into the rule. Because it would not be reflective of the project as it is proposed for approval, it would provide an artificial analysis of a hypothetical set of circumstances rather than of the project that is proposed for approval.

Furthermore, the CEQA Backstop provisions of Proposed Rule 1315 would prevent offsets in the SCAQMD's internal offset accounts from being used in amounts that would result in emissions exceeding the forecasts in the Draft PEA. Proposed Rule 1315 includes yearly Cumulative Net Emission Increase Thresholds, which will act as caps on the use of emission reduction credits under Proposed Rule 1315 for VOC, NO_x, SO_x and PM₁₀. Under these CEQA Backstop provisions, if, at any time, the cumulative net emission increase for a nonattainment pollutant exceeds the specified cumulative emissions increase threshold, issuance of permits under Rules 1304 and 1309.1 will be suspended. Further permits could be issued only after the cumulative net emission increase returns to a level that is at least ten percent below the corresponding cumulative emission increase threshold. See Responses to Comment 1-27 for a further discussion.

Effect of tracking excess emission reductions. Several of the comments question why the SCAQMD would potentially be "banking" more emission reductions under Rule 1315 than would be necessary to offset emissions from permits issued under Rules 1304 and 1309.1.

There are several reasons why the total quantity of offsets tracked could exceed the amount of emissions forecasted in the PEA for permits issued in reliance on internal account offsets. First, emissions offsets in the SCAQMD's internal accounts would be adjusted downward on an annual basis to reflect new control measures and technologies that would have been required at the sources that had shut down or been modified; this would reduce the quantity of tracked emissions reductions that qualify as "surplus" reductions, and that are then available for use as offsets. Proposed Rule 1315(c)(4). Second, the ratio of offsets required to emissions permitted is not always a 1:1 ratio. For example, to demonstrate equivalency with federal offset requirements, the ratio of offsets that currently must be allocated from the SCAQMD's offset accounts is 1.2 to 1.0 for extreme nonattainment air contaminants and their precursors. Third, changes to offset ratios could occur in the future that would require a greater number of offsets

than is currently required be used to offset a given amount of emissions in order to demonstrate equivalency.

Furthermore, as a practical matter, it is not feasible to design a tracking system that would track just enough offsets to supply the demand. Doing so would require detailed advance knowledge of future demand, future generation, and future surplus at the time of use adjustments to the District Offset Account Balances pursuant to Proposed Rule 1315(c)(4). For example, neither the rate of offset use nor the rate of offset generation would be consistent from year to year. Use would generally be higher in years when the economy is doing well and lower in years during economic hard times. On the other hand, offset generation would tend to be higher when the economy is struggling and lower when it is booming. If a period of economic recession is followed by a growing economy, and if only sufficient offsets were tracked to cover concurrent demand during the recession, then there may not be adequate offsets available to allow the economy to grow when the recession ends even though overall total emission reductions that were trackable were adequate to supply the demand simply because the peak demand and peak generation did not occur concurrently. Finally, there is no logical reason why the tracking system should be designed to only track the amount of emission reductions that will ultimately be used as offsets. Rather, the appropriate way to design any accounting system is to identify and accurately track all sources of credits and all sources of debits.

Effect of the Superior Court’s ruling on the impact analysis methodology. The comment letter’s suggestion that the ruling of the Los Angeles Superior Court requires that the PEA assume that all offset credits recorded in the SCAQMD’s internal offset accounts would be used is not correct. The court concluded that adoption of the prior version of Rule 1315 in 2007 would allow the SCAQMD to significantly expand the quantity of offset credits in the SCAQMD’s internal accounts by recognizing types of emissions reductions that had not previously been accounted for, and these offsets would then be available for use in permitting new and modified sources. The court also concluded that these additional offsets would result in pollution when the SCAQMD allows permit applicants to “access” them. The Draft PEA’s methodology of forecasting project-related emissions based on projections of internal offsets that will be accessed, rather than based on the emissions reductions that will be tracked in the SCAQMD’s internal accounts, is consistent with this aspect of the court’s decision.

Further, the court found the impact analysis that had been completed was flawed because it “disaggregated” Rules 1315 and 1309.1, and “failed to consider the obvious and intended consequences of the rules operating in tandem.” This part of the court’s ruling indicates that a proper impact analysis must consider the effect of Rule 1315 (internal offset tracking) operating “in tandem” with Rules 1304 and 1309.1 (providing access to those internal offsets). The analysis in the Draft PEA complies with this direction.

In addition, the allowed uses of offsets in the SCAQMD’s internal accounts under Proposed Rule 1315 would be different than under the prior version of the rule that was reviewed by the court. Under the prior version of the rule, a broad range of new and modified sources would have been eligible to obtain offsets from the SCAQMD’s internal offset accounts under the offset budget provisions of Rule 1309.2, once that rule was approved into the SIP. In addition, power plants would have been given access to offsets from the SCAQMD’s internal offset accounts under the power plant amendments to Rule 1309.1 the SCAQMD had adopted in 2006 and 2007. The

SCAQMD has since rescinded Rule 1309.2. The SCAQMD also set aside the power plant amendments to Rule 1309.1 in response to the court's ruling and has not proposed to re-adopt them. As a result, many of the sources that would have been able to rely on offsets in the SCAQMD's internal offset accounts under the prior version of the rule would not be able to access the internal offset accounts under Proposed Rule 1315. Accordingly, the effect of Proposed Rule 1315 operating in tandem with Rules 1304 and Rule 1309.1 would be significantly more limited than the effect of prior Rule 1315 operating in tandem with the access rules then in effect.

In addition, the former version of Rule 1315 did not include any limitations on the quantity of internal account offsets that could be used to support issuance of permits. By contrast, the annual pollutant-specific net emissions increase caps built into Proposed Rule 1315 would prevent offsets in the SCAQMD's internal offset accounts from being used in amounts that would exceed the emissions forecasts in the Draft PEA. The proposed rule by its terms thus precludes the occurrence of a situation in which all available credits would be used. (Draft PEA, 8.06) See Responses to Comment 1-27 for a further discussion of this provision of Proposed Rule 1315.

Finally, the overall direction provided by the court in its decision was that the environmental assessment prepared by the SCAQMD comply with CEQA's standards for an adequate analysis of the project's environmental impacts. The methodology used in the Draft PEA to assess project-related emissions was designed to give the most accurate, reliable and realistic assessment that can be provided of the actual effects the project would have on pollution emissions, and the resulting impacts to air quality, human health, greenhouse gases and visibility.

Use of the Year 2030 as the end date for the project. The comment letter disagrees with the statement that the project will end in 2030, asserting that the need for and use of offsets will continue as long as the South Coast Air Basin fails to attain either the federal or state ambient air quality standards. (See Footnote 12, appended to comment 1-9.) The proposed Rule includes a sunset date of January 1, 2031. (See the Project Description in the Draft PEA, page 2-19) This sunset date is included in the Rule to correspond to the end year of analysis under the 2007 AQMP. (See 2007 AQMP, Appendix III, "Base and Future Year Emission Inventories" Table C-10) At this time, it is not possible to predict what the ambient air quality standards will be after this sunset date, what offset requirements for new or modified sources will be in effect or the region's attainment status. After Rule 1315 sunsets, the SCAQMD Governing Board would be free to decide not to adopt a replacement rule even if offsets are still required. This would eliminate the availability of internal account offsets altogether, which would mean that all new or modified sources, including Rule 1309.1 priority reserve sources and Rule 1304 exempt sources, would have to rely on private-market offsets to the extent required by the new source review provisions in effect at the time. In the event adoption of a replacement rule is proposed, that would be a new project under CEQA, and the SCAQMD would be required to complete an environmental assessment for that project. Any attempt to assess the impacts of adopting a potential replacement rule twenty years from now in the current PEA could be based on nothing more than speculation about whether and for what pollutant or pollutants the South Coast Air Basin may remain in nonattainment of future as yet unpromulgated ambient air quality standards after the year 2030, as well as speculation about the sources that would obtain permits and what their emissions would be.

Scope of analysis of health impacts. Responses to Comment 1-21

Health impacts to persons under 25 years of age. The comment raises a concern that the analysis in the Draft PEA was limited to people over 25 years of age. The Draft PEA, however, analyzed health effects on persons of varying ages, including infants and children. As explained in the Draft PEA, the methods of health impacts estimations were based on those used in the 2007 AQMP. That analysis provided an estimate of health effects for which there were methods available to quantify such effects, including effects on infants and children.

The health effects selected for analysis in the AQMP were those for which there was sufficient information that allowed for a quantitative estimate of effects from pollutant exposure. See report from Stratus Consulting that reviewed the available data and methods for assessing health effects for air pollutant exposures. (Recommended Health Benefit Assessment Methods for the 2007 AQMP Socioeconomic Assessment Final Report, Stratus Consulting Inc., 2008) Table 2-2 from the report lists the basis for the assessments, and is reproduced below. Note that effects on infants and children are included.

Table 2.2. Summary of recommended central concentration-response functions for quantified health effects of PM_{2.5} and ozone

Health effect	Relative risk	Pollutant
Mortality		
Adults, ages 30+	1.11 ^a	10 µg/m ³ PM _{2.5} (annual avg.)
Infants, ages 1-12 months	1.07	10 µg/m ³ PM _{2.5} (annual avg.)
All ages	1.004	10 ppb ozone (daily max. 1-hr)
New cases of chronic bronchitis		
Adults, ages 27+	1.14	10 µg/m ³ PM _{2.5} (annual avg.)
Respiratory hospital admissions		
All respiratory, ages 65+	Weighted ^b	10 ppb ozone (daily avg.)
Pneumonia, ages 65+	1.04	10 µg/m ³ PM _{2.5} (annual avg.)
COPD, ages 65+	Weighted ^b	10 µg/m ³ PM _{2.5} (annual avg.)
All respiratory, ages 18-64	1.017	10 ppb ozone (daily avg.)
All respiratory, ages < 2	1.065	10 ppb ozone (daily avg.)
COPD, ages 18-64	1.02	10 µg/m ³ PM _{2.5} (annual avg.)
Cardiovascular hospital admissions		
Ages 65+	Weighted ^b	10 µg/m ³ PM _{2.5} (annual avg.)
Ages < 65	1.014	10 µg/m ³ PM _{2.5} (annual avg.)
Asthma emergency room visits		
Asthmatics, all ages	Weighted ^b	10 ppb ozone (daily avg.)
Asthmatics, ages < 18	1.017	10 µg/m ³ PM _{2.5} (annual avg.)
Nonfatal heart attacks		
Adults, ages 18+	1.09	10 µg/m ³ PM _{2.5} (annual avg.)
Acute bronchitis episodes		
Children, ages 5-17	1.27	10 µg/m ³ PM _{2.5} (annual avg.)
Upper respiratory symptom days		
Asthmatics, ages 5-17	1.04	10 µg/m ³ PM _{2.5} (annual avg.)
Lower respiratory symptom days		
Children, ages 5-17	1.17	10 µg/m ³ PM _{2.5} (annual avg.)
Work loss days		
Adults, ages 18-64	1.07	10 µg/m ³ PM _{2.5} (annual avg.)
Minor restricted activity day		
Adults, ages 18-64	1.077	10 µg/m ³ PM _{2.5} (annual avg.)
Adults, ages 18-64	1.022	10 ppb ozone (daily avg.)
School absence day		
Children, ages 5-17	1.075	10 ppb ozone (daily max. 8-hr)

ppb = parts per billion; chronic obstructive pulmonary disease = COPD.

a. This is a weighted mean RR from results of Pope et al. (2002), Laden et al. (2006), and Jerrett et al. (2005).

b. These RR are based on weighted averages from two or more study results. The weighting is done in the Benefits Mapping and Analysis Program after the number of cases is calculated for each individual study RR result for the air pollution change in each location.

The commenter cites data files that accompanied the Draft PEA to support the proposition that the health effects analysis was limited to individuals over the age of 25. The files the comment refers to relate to a particular analysis of PM_{2.5} impacts of three power plants. For purposes of the Draft PEA, the health effects of emissions from these power plants were included in the cumulative health impacts analyses, which are found in Tables 4.1-32 and 4.1-33 of the Draft PEA, which includes impacts to individuals of all age groups. The particular studies used to derive the source-specific PM_{2.5} mortality data for the power plants did not include children. However, that is the approved methodology used by CARB and allowed by CARB to be used for relatively smaller sources (as distinguished from regional modeling). For purposes of the Draft PEA, which analyzed regional impacts, the health effects of emissions from these power plants

were included in the cumulative health impacts analyses, which are found in Tables 4.1-32 and 4.1-33 of the Draft PEA, which includes impacts to individuals of all age groups.

The comment also states that lost school days were not included in the Draft PEA analyses. This is also erroneous, as school absences were, in fact, included with ozone estimated impacts (Tables 4.1-29 and 4.1-32 of the Draft PEA).

With respect to PM_{2.5} effects, the following updated information is provided. The methods used to calculate premature mortality from exposures to PM_{2.5} in the analysis gives estimates that are higher than if the methodology presented by the California Air Resources Board in their most recent estimates of PM_{2.5} mortality effects were used [Estimate of Premature Deaths Associated with Fine Particle Pollution (PM_{2.5}) in California Using a U.S. Environmental Protection Agency Methodology, California Air Resources Board, August 31, 2010. http://www.arb.ca.gov/research/health/pm-mort/pm-report_2010.pdf]. If this recently reported methodology were used, the mortality estimates from PM_{2.5} would be reduced by about half. This is because of a lower value for the dose effect relationship between pollution exposure and mortality. Thus, compared to CARB's recent report, the mortality estimates may be on the high side by a factor of 2.

To put some perspective on the mortality estimates, it may be useful to compare the Draft PEA incremental estimates to those related to current air quality. According to the CARB report referenced above, recent PM 2.5 levels (2006 – 2008 annual average) are associated with up to 4,900 mortalities annually in SOCAB. According to the CARB report, attaining the PM_{2.5} NAAQS in SOCAB would result in reducing this PM_{2.5} related mortality by up to 2,000 deaths annually. The PEA estimates annual mortalities related to the project of from 7 to 20 for ozone (Table 4.1-29), and from 33 to 125 for PM exposures Table 4.1-31.

Relationship of PM and ozone to elevated risks from other illnesses and causes of death. There are numerous reports and publications suggesting a link between PM and ozone to health effects. The effects chosen for the impact analyses in the Draft PEA were those for which there is sufficient evidence of a causal association, and for which there are sufficient data available to conduct a credible analysis. The US EPA has exhaustively reviewed the health effects of PM and ozone, and has indicated the strength of evidence for causality for health effects. [See references: U.S. EPA. Integrated Science Assessment for Particulate Matter (Final Report), U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-08/139F, 2009; and U.S. EPA, Review of the National Ambient Air Quality Standards for Ozone: Policy Assessment of Scientific and Technical Information, U.S. Environmental Protection Agency, Washington, DC, EPA-452/R-07-007, July 2007] The analyses conducted by SCAQMD include those effects for which EPA has concluded the level of evidence for effects is causal or likely to be causal. Where EPA has not found a causal or likely to be causal effect, those effects were not included in the quantitative estimates of impacts. The analyses presented are adequate to assess the potential for adverse effects from emissions related to the project.

The comment asserts that SCAQMD ignores studies that indicate that climate change will exacerbate the environmental and health impacts of ozone and PM. The comment relates to the potential impact of climate change on ozone and PM, with resulting health impacts. Scientists

are beginning to study the effects of climate change on ground level ozone and particulate matter. So far, different studies have yielded different results.

For example, a recent study for the California Air Resources Board, “*Climate Change Impact on Air Quality in California*”, Michael J. Kleeman, et al., No. 04-349, June 2010 (<http://www.arb.ca.gov/research/apr/past/04-349.pdf>.) notes that most earlier studies have predicted that climate change will reduce global tropospheric ozone concentrations. (pg. 29) However, the report also noted studies indicating that climate change was likely to cause increased ozone in North America, including California. (pg. 30) The report also noted a study indicating that annual average PM2.5 concentrations would decrease as a result of climate change, and that California would experience an average decrease of 186 cases of premature death, with decreasing trends in other PM2.5 related health issues. (pg. 31). The Kleeman study itself found mixed results. Regional ozone concentrations increased the most in response to increased temperatures while small decreases were noted in some areas. (pg. 39) Regional annual average PM2.5 concentrations, in contrast, were expected to decrease as a result of climate change by 3 to 15 micrograms per cubic meter. (pg. 44) Combining the increased ozone with climate change impacts leads to an increase in PM2.5 in some areas and a decrease in others. (pg. 45) As distinguished from annual average concentrations, (relevant to the annual average standard), peak PM2.5 concentrations (relevant to the 24-hour standard), generally increased, as a result of increased ozone. (pg.54) However, an important limitation of the Kleeman study is it assumes that regional criteria pollutant emissions would be the same far into the future as they were in 1990-2004 (pg. 25). This is not likely realistic, given the stringent control programs being implemented now and in the future. One study cited by the commenters, Chang et al., noted that it also assumed that ozone precursor emissions remained unchanged. *Int. J. Environ. Res. Public Health*, 2010, pg. 2876. The other study cited by the commenters also reported mixed results in the literature, Ebi et al., “Climate Change, Tropospheric Ozone and Particulate Matter, and Health Impacts,” *Ciencia & Saude Coletiva*, vol. 14 no.6, Dec. 2009., page at fn. 50, and fns. 49, 58, and 64-65. In view of the mixed results of various studies, it is not possible to predict with certainty how climate change will affect future ozone and particulate matter, and whether health effects will be substantially changed.

Impacts to Biological Resources. Responses to Comment 1-22

The comment letter asserts that the Draft PEA did not consider adverse air quality impacts to sensitive species such as lichens, leafy vegetables, and ecosystems, such as Southern California’s mixed conifer forests.

The Draft PEA evaluated the air quality impacts from ozone, particulate matter, SO₂, NO₂, lead and CO concentrations due to the proposed project. The analysis concluded the impacts to be significant because of exceedances of the SCAQMD’s mass significance thresholds. The Draft PEA also discusses the project’s contribution to exceedances, if any, of the ambient air quality standards.. These standards encompass both primary (human health) and secondary (public welfare) effects. Public welfare effects encompass effects other than effects to human health, including effects on vegetation and ecosystems. The ambient air quality standards are currently the same for both primary and secondary effects, with the exception that the SO₂ primary 1-hour standard is more stringent than the secondary SO₂ standard. Thus, the impact to biological resources as measured against the secondary ambient air quality standards applicable to

biological resources has been assessed in the Draft PEA through the impact evaluation against the primary standard.

There are numerous reports and publications in the scientific literature such as the studies cited in the comment letter that relate air pollutants to effects on biological resources. Most of these studies have focused on the effects of ozone. However, only a few provide information that might be used to develop methods to estimate effects from ambient exposures quantitatively and there are a number of factors that complicate such an evaluation. For, example, there is little or no data regarding precise dose (exposure) and response (effects) of air quality on biological resources. Further, most information on the effects of ozone on ecosystems is inferred from ozone exposures to individual plants and processes and it is difficult to use this information to quantify ecosystem-level productivity losses because of the complexity in scaling this information to the ecosystem level. Further difficulties in attributing growth losses to ozone can arise due to confounding factors with other stresses present in ecosystems including climate, insect damage, soil moisture, disease and other air pollutants. See U.S. EPA. 2007. Review of the National Ambient Air Quality Standards for Ozone: Policy Assessment of Scientific and Technical Information²; California Air Resource Board, Air Pollution Research Reports/Studies – Ecological Effects of Air Pollution, California Air Resource Board, Air Pollution Research Reports/Studies – Ecological Effects of Air Pollution;³ ASL Associates, Reconsidered Comments⁴.

Nevertheless, to provide a general perspective on potential impacts to biological resources, an analysis of crop yield and biomass loss in the district due to project-related ozone impacts has been performed for three periods: 2010 through 2014, 2010 through 2023 and 2010 through 2030. The analysis uses the biomass loss functions presented in U.S. EPA’s “Technical Report on Ozone Exposure, Risk and Impact Assessments for Vegetation,” (January, 2007) together with the project-related ozone impacts predicted from the regional modeling analyses.

With respect to crops, the EPA report provides concentration-response yield loss functions for selected crop exposures to ozone concentrations. Biomass loss functions ranged from a low value of near zero for corn to a high value of 0.77 percent per ppb exposure for grapes. The primary agricultural areas of the District produce corn, oranges, potatoes, grapes, lettuce, tomatoes and beans. To provide a conservative estimate, the Basin maximum incremental project-related ozone concentrations and Coachella Valley maximum incremental project-related ozone concentrations were used to estimate representative ozone effects on crops. Using the biomass loss functions from the technical report for grapes as representative of the most sensitive crop, the projected maximum biomass effect would be approximately 2.1 percent in 2030 for the Basin and 1.2 percent in 2030 for the Coachella Valley. This means that, absent the emissions attributed to the proposed Project, grape plants and other crops could have up to 2.1 percent more biomass in the Basin in 2030 and 1.2 percent more biomass in the Coachella Valley in 2030 than they would be expected to have under conditions with the Project. Effects on crop biomass for either area in 2014 and 2023 are estimated to be less than 1.0 and 1.5 percent respectively. It

² http://www.epa.gov/ttnnaaq/standards/ozone/data/2007_07_ozone_staff_paper.pdf

³ <http://www.arb.ca.gov/research/apr/past/ecol.htm>.

⁴ http://www.asl-associates.com/Reconsidered_comments_ozone_standard.htm

should be noted that these estimates represent the outer bound of the impact because they use figures for maximum ozone impacts and the highest value for biomass loss function.

To further characterize vegetation effects, effects on trees in the Angeles and San Bernardino National Forests, which ring the South Coast Air Basin, were estimated. The representative species of trees include the Ponderosa Pine and the Douglas Fir. The EPA technical report provides the concentration-response functions for selected tree species' exposure to ozone concentrations. The percentage biomass loss for the Ponderosa Pine was conservatively estimated at 0.24 percent per ppb exposed and near zero for the Douglas Fir. The maximum ozone concentrations resulting from the proposed project at the San Bernardino Mountains were 0.6, 1.9 and 3.0 ppb for 2014, 2023 and 2030 respectively. Using the biomass loss function for the Ponderosa Pine, the project would result in an approximate maximum potential biomass loss of 0.9 percent by 2030 compared to conditions without the project. Biomass loss for 2014 and 2023 would be less than 0.5 percent compared to conditions without the project.

The commentator also expressed concern about potential impacts from air quality on lichens and cited to a 1996 literature review paper on the effects of deteriorating air quality on lichens in the Pacific Northwest and a link to a webpage. According to this reference⁵ provided by the commentator, "SO₂ is considered to be the primary factor causing the death of lichens" and "most lichens cannot survive extended periods of SO₂ exposure above 60 mg/m³." An SO₂ concentration of 60 mg/m³ is approximately equivalent to 21 parts per million (ppm). The proposed project and cumulative proposed project will result in a maximum exposure of 1.0 ppb of SO₂ emissions, which equates to 2.86 mg/m³.

Potential for future changes to project. Responses to Comment 1-23 and 1-28

The comment letter suggests that it is foreseeable that revisions could be made to Rules 1304 and 1309.1 to expand access to Rule 1315 offsets, and that the possibility that this might occur requires that the PEA evaluate the impacts of "all of the credits available being used." See Comment 1-23.

The SCAQMD has no plans to expand access to Rule 1315 offset accounts beyond the provisions of existing Rules 1304 and 1309.1. Amendments to Rules 1304 or 1309.1, or other actions to expand access to Rule 1315 offset accounts are not part of the project proposed for approval and such actions would not result from project approval. The Draft PEA accordingly appropriately analyzes the impacts of Rule 1315 operating in conjunction with existing Rules 1304 and 1309.1.

The Draft PEA's impact assessment is based on projections of internal offset use over the life of the project. Rather than being speculative as asserted in the comment (Comment 1-23), these projections are based on reliable historical data relating to permit issuance, as well as forecasts of future growth within the relevant industry categories. Given the conservative approach to developing these projections, if anything, they overestimate the extent of Rule 1315 internal

⁵ Jenifer Hutchinson, Debbie Maynard, and Linda Geiser, "Air Quality and Lichens - A Literature Review Emphasizing the Pacific Northwest, USA," USDA Forest Service, Pacific Northwest Region Air Resource Management Program, Dec. 16, 1996, available at: <http://www.fs.fed.us/r6/aq/lichen/almanac.htm>

offset use in the future. On the other hand, basing the impact analysis on the total number of internal offsets that would accrue in the SCAQMD's accounts, without considering their use, as suggested by the comments, would be grounded on a hypothetical assumption that cannot be supported by empirical data. See Responses to Comment 1-20.

The comment letter also indicates that it is foreseeable that new rules or legislation could be adopted that would "open the bank of credits to any proposed source of air pollution" (Comment 1-28) See also comments 1-18--1-20. However, the use that can be made of Rule 1315 offset accounts is defined by Proposed Rule 1315 and the credits that are tracked under the proposed rule cannot be used for any purposes other than those envisioned by the proposed rule and the environmental analysis that was completed for adoption of the proposed rule. Accordingly all Rule 1315 offsets that are "drawn upon" for purposes of federal New Source Review offset requirements must be used consistent with the provisions of Proposed Rule 1315. In addition, adoption of new or amended rules relating to the use of offsets in the SCAQMD's internal bank as hypothesized by the comments would constitute a separate, independent project, and a new review under CEQA would be required for that project.

It also bears noting that with SB 827, the California legislature exercised its authority to direct SCAQMD to provide sources access to internally tracked offsets during the permit moratorium that followed from the Superior Court decision that resulted in previously adopted Rule 1315 being vacated. As a result of the court decision, over 1200 permits ultimately were placed on hold, involving essential public services and a myriad of business operations, including small business. Equipment replacement projects that would result in newer, cleaner and more efficient equipment could not be implemented. Therefore, the legislature saw the need to provide interim relief, to allow these projects to go forward, and adopted SB 827. There is no reason to believe that the opposite situation -- having a tracking rule such as Proposed Rule 1315 in place -- would cause the legislature to take a similar action.

Baseline for projecting emissions attributed to the project and assessing impacts of the project. Responses to Comment 1-24.

The comment, which refers to provisions of the CEQA Guidelines relating to the environmental "baseline" mixes three distinct concepts relevant to the analysis of the project's air quality impacts: measuring the project's impact by estimating the quantity of emissions expected to result from it, projecting when those emissions will take place, and then providing a further analysis of the impact of those emissions as they occur over time within the context of other emissions in the region.

To measure the emissions impact of the project, the PEA's emissions analysis quantifies emissions of the relevant pollutants from sources expected to receive permits under Rules 1304 and 1309.1. The analysis derives project-related emissions in relation to an existing conditions baseline under which there is no internal offset tracking rule so no permits can be issued under Rule 1304 or 1309.1.⁶ Because such permits would be issued over the 20-year life of the project,

⁶ Under existing conditions, permits actually are being issued under Rules 1304 and 1309.1 pursuant to SB 827; however, SB 827 sunsets in May, 2012 so for purposes of the analysis in the PEA it is assumed that no such permits would be issued.

APPENDIX J: RESPONSES TO COMMENTS ON DRAFT PEA

the Draft PEA contains time-based projections of the growth in project-related related emissions for three cumulative time periods through the end of the project in 2030. These projections are designed to provide a complete accounting of the magnitude of the criteria pollutant emissions impact of the proposed project. See Tables 4.1-3, 4.1-4. The data show that the daily emissions in tons per day expected to result from the proposed project by 2030 (the end date for the project), are as follows:

VOC	NOx	Sox	PM10	PM2.5	CO
44.59	3.31	0.74	4.44	2.82	6.26

The Draft PEA then applies the SCAQMD’s numeric significance thresholds to assess the significance of these impacts. See Draft PEA page 4.1-10.

Because project-related permits will be issued over a 20 year period, the Draft PEA expands on this analysis by also evaluating the impact of project-related emissions within the context of expected future conditions, what the Draft PEA refers to as the “future baseline.” It does so using relevant points of comparison in order to assess the project’s impacts on the environment as its impacts increase over time.

First, the Draft PEA characterizes these impacts by comparing the incremental increase in daily emissions expected to result from the project with forecasts for all regional, cumulative emissions in 2030. This comparison is made with all stationary and area source emissions and is also made with emissions from all sources including mobile sources. (See Draft PEA page 4.1-14 through 4.1-15) This analysis shows the proportion of forecasted regional emissions expected to result from the proposed project and demonstrates how much higher regional emissions would be with the project than without the project.

In addition, the PEA provides a further analysis by examining the project’s effect on regional concentrations of pollutants over time. This analysis makes clear the extent to which the project would be expected to increase the concentrations of pollutants in the air as the project is implemented. As explained above, the emission concentrations attributed to the project are based upon the quantity of emissions projected to result with the project in place compared to existing conditions under which no permits would be issued. The analysis evaluates this project effect by considering it within the framework of forecasts relating to attainment of air quality standards. Draft PEA pages 4.1-15 through 4.1-24

This concentration-based air pollution analysis also is used in the analysis of the project’s effects on human health. That analysis shows the health effects of the emissions attributed to the proposed project. Draft PEA pages 4.1-33 through 4.1-41. The concentration-based analysis of the project’s pollution impacts is also used in the analysis of the extent to which emissions attributed to the project would impair visibility. Draft PEA pages 4.1-45 through 4.1-47.

The comment letter objects to this methodology, suggesting the analysis should have been conducted by “simply looking to existing actual levels [of regional emissions] to set a baseline from which to measure impacts.” If this comment refers to measurement of the emissions attributable to the proposed project, as noted above the analysis derives the quantity of project-related emissions in relation to an existing conditions baseline, without proposed Rule 1315. If,

however, the comment is suggesting that the impact analysis should have assumed that all project-related emissions would occur in the past when the NOP was issued, such a procedure would not provide any meaningful information about the effect the project would have on air quality. It would instead provide a hypothetical analysis that would have no relation to what would actually occur in the real world in the event the project is approved. Because the project's impacts would unfold and increase over a 20-year period, such a static form of analysis would not provide a meaningful assessment of the project's actual effect on air quality.

The comment letter implies that the Draft PEA's forecasts of future project-related emissions understate project-related emissions by "assuming that future environmental gains will occur." This is incorrect. The emissions forecasts in the Draft PEA are based upon the emissions control rules and regulations already in effect at the time the AQMD was adopted. The analysis does not consider emissions control rules and regulations that might be adopted in the future. As a result, the quantity of mass emissions attributable to the project would not change if all permits issued under the project were assumed to be issued immediately, as is suggested by the comment, instead of being issued over the twenty year life of the project. Of course, a scenario under which all permits would be issued immediately would not be consistent with the economic forecasts that form the basis for the growth projections, nor would such a scenario be possible in light of the yearly net emission increase thresholds embedded in the CEQA Backstop provisions of the proposed rule.

The comment letter also disagrees with the Draft PEA's emission forecasts by incorrectly contending that the Draft PEA's assessment of future air quality impacts "prematurely ends the analysis of the Project's impacts by assuming attainment in attainment years." As discussed in response to Comment 1-25, it is also incorrect to state that the Draft PEA stops attributing emissions to new facilities that would rely on Rule 1315 after attainment for various pollutants is achieved. The methodology used in the Draft PEA conservatively assumes that emissions offsets in the SCAQMD's internal offset accounts would be used for permits issued under Rule 1304 and Rule 1309.1 for the life of Proposed Rule 1315, through 2030. The Draft PEA does not reduce the emission estimates for sources projected to be permitted under these rules based upon projected attainment dates for particular pollutants.

Comparison with *CBE* decision. The methodology used in the Draft PEA bears no resemblance to the methodology disapproved by the Supreme Court in *Communities for a Better Environment v. South Coast Air Quality Management District*, 43 Cal. 4th 310, 322 (2010). There, the Supreme Court rejected an impact analysis that compared emissions that would be caused by expansion of a refinery with emission levels that would be allowed by an existing permit for some of the equipment at the refinery; such a comparison to permitted levels did not measure the actual increase in emissions that would result from the project, because it assumed all emissions allowed by the existing permit were already occurring. Here, however, the Draft PEA provides data for all of the emissions that would result from all of the permits expected to be issued in reliance on Rule 1315, and those emissions are calculated using a zero emissions reference point: the analysis assumes that none of the emissions attributed to the project would occur if the project is not approved. Then, as the next step of the analysis, the Draft PEA evaluates the effect on regional air quality over the life of the project. Thus, the method of analysis is not at all similar to the method of analysis the court rejected in the *CBE* case.

Forecasts of future regional emissions. To the extent the comment letter criticizes the Draft PEA's forecasts of future emissions in the region, it should be noted that those forecasts are taken from the 2007 AQMP. As is explained in Appendix III to the 2007 AQMP, the

forecasts are grounded on an inventory of emissions by source category and industry. Growth rates for each industry are projected based on the Southern California Association of Governments 2004 Regional Transportation Plan, adjusted by recent data from the relevant state and federal agencies: the Bureau of Labor Statistics, California Department of Finance, California Employment Development Department and U.S. Census Bureau. The AQMP forecasts thus take account of industrial growth, population growth, job growth and resulting changes in transportation patterns. Appendix III to the 2007 AQMP identifies the growth rate used in its forecasts for each industry and source category, and explains how the resulting emissions growth was distributed by county. This is the best available and most comprehensive data for the relevant time period.

To the extent the commenters seek information regarding the emissions inventory under existing conditions in 2010, that information is found in Appendix III to the 2007 AQMP at Table A-4. As set forth in the AQMP, total 2010 annual average emissions for stationary and area sources are as follows: VOC-248.44 tons/day; NO_x- 79.65 tons/day; SO_x- 16.32 tons/day; PM₁₀- 236.63 tons/day; and PM_{2.5}- 66.21 tons/day. Total 2010 annual average emissions from all sources (including mobile sources) are as follows: VOC-572.42 tons/day; NO_x- 774.65 tons/day; SO_x- 39.22 tons/day; PM₁₀- 280.89 tons/day; and PM_{2.5}- 101.36 tons/day.

PM 2.5 analysis and PM 2.5 attainment. Responses to Comments 1-25 and 1-26.

Analysis of PM 2.5 impacts. The comment letter (comment 1-25) states that the Draft PEA curtails the analysis of particulate matter emissions, and associated health effects, by presuming that no offsets would be issued from the SCAQMD's internal accounts after 2014, citing the Draft PEA page 4.1-36. Table 4.1-30 on that page describes estimated PM_{2.5} and PM₁₀ health benefits that are expected to result from implementation of the 2007 AQMP in the year 2014. This table does not describe the impacts of the proposed project. The health effects from particulate matter attributed to the proposed project are set forth in Table 4.1-31 on page 4.1-37. Table 4.1-31 shows the particulate matter-related health effects of implementing the proposed project for the three time periods used to assess project impacts through the year 2030. The impact analysis does not assume that offsets would no longer be issued from the SCAQMD's internal accounts after 2014 and for that reason provides impact data showing the increases in impacts through 2030.

Attainment demonstration. The comment letter (comment 1-26) asserts that the Draft PEA's statement (page 4.1-19) that the 2007 AQMP demonstrates attainment with the PM_{2.5} NAAQS is incorrect. The first cited reason is that EPA has proposed to disapprove the 2007 AQMP PM_{2.5} attainment demonstration, and according to the comment, this means that EPA does not believe the SCAQMD will come into attainment by 2015 and that EPA does not intend to extend the attainment deadline to 2015. The second cited reason is the commenter's assertion that EPA's rules preclude the Draft PEA from assuming that the 2007 AQMP demonstrates attainment. The comment contends that the impact analysis for PM_{2.5} rests on an incorrect conclusion about attainment and is therefore flawed.

However, the date that PM_{2.5} attainment will be achieved does not affect the analysis of PM_{2.5} impacts in the Draft PEA. As explained in the Responses to Comment 1-25 above, the Draft PEA does not limit the analysis of project effects based on the assumption that offsets will not be needed for PM_{2.5} after 2014. To the contrary, the EA continues to attribute particulate matter

emissions to the project throughout the life of Proposed Rule 1315, through the year 2030. This ensures that the potential environmental effects of the project are fully described and not understated in any way.

Although issues raised in the comment relating to EPA approval of the attainment demonstration do not relate to the scope of the impact analysis for PM_{2.5} emissions, the following responses address the comments about EPA's pending decision on the attainment demonstration:

First, the cited EPA proposed disapproval is not a final decision. EPA may ultimately decide to approve the AQMP's PM_{2.5} attainment demonstration, especially if the state submits a revised state implementation plan as part of the "mid-course review" EPA has scheduled for April 2011. (EPA, page 57, 75 Fed. Reg. 71294, 71314, Nov. 22, 2010) EPA has stated to the SCAQMD that it does not plan to take final action on the proposed disapproval prior to Fall 2011, so the SCAQMD and CARB will have time to revise the plan and address any issues identified by EPA.

Second, EPA's proposed disapproval is based on issues relating to EPA's interpretation of its duties under the Clean Air Act relating to the status of rule adoption, and does not mean that the region will not in fact attain the standard by 2015. EPA explains that it is able to approve enforceable commitments to adopt rules, in lieu of fully-adopted rules, where the commitment is for a "limited portion" of the reductions needed to attain the applicable standard. EPA recognizes that "the majority of emission reductions needed to demonstrate attainment and all of the emission reductions needed to demonstrate [reasonable further progress] come from rules that were adopted prior to the AQMP's submittal..." (EPA pages 63-64, 75 Fed. Reg. 71294, 71308) However, EPA concludes that the AQMP relies on enforceable commitments for 27 percent of the necessary reductions, and that this amount exceeds the 10 percent "generally accepted" by EPA. (EPA pages 70-71, 75 Fed. Reg. 71294, 71308) This technical conclusion does not mean that EPA has concluded the region will not attain the applicable standard by 2015. Indeed, EPA has stated that "Given the evidence of the State's and District's efforts to date, and their continuing program to adopt controls, we believe that the State and the SCAQMD are capable of meeting their enforceable commitments to achieve the necessary reductions in the South Coast nonattainment area by 2014." (EPA page 67, 75 Fed. Reg. 71294, 71309)

Comment 1-26 also states that the Draft PEA does not discuss future PM_{2.5} standards that will need to be met. However, the Draft PEA describes the future 24-hour PM_{2.5} standard at page 4.1-19. While EPA may adopt additional more stringent standards in the future, it is not possible at present to define what these standards will be.

Mitigation for emissions impacts. Responses to Comment 1-27

Several comments suggest that the Draft PEA does not offer mitigation for the impacts of the project. Comment 1-27. See also Comments 1-3, 1-4, 1-5 and 1-29.

First, it should be recognized that the SCAQMD's rules require that the most advanced control technology be employed for all new and modified sources, and these requirements apply to sources that are permitted in reliance upon offsets in the SCAQMD's internal accounts. Under Rule 1303(a)(1), all new and modified sources resulting in an increase of nonattainment

pollutants and their precursors are required to use Best Available Control Technology (BACT). Further, the Best Available Control Technology for Toxic Air Pollutants (T-BACT) is required for new and modified sources that emit toxic air contaminants over established risk levels. These requirements mean that the cleanest available technology must be used by new and modified sources. The application of these rules to permits for new and modified sources ensures that emissions by each new or modified source are mitigated by being reduced to the maximum extent feasible.

Because the SCAQMD's rules relating to issuance of permits require that emissions be mitigated on a source by source basis to the extent it is feasible to do so, the remaining mitigation strategy that would further reduce project-related emissions would involve restricting the number of permits for new or modified sources that can be issued by limiting the availability of internal offsets for those permits. The Draft PEA's Alternatives analysis examines the possibility of doing so.

The CEQA Backstop limitations on cumulative net emission increases contained in the proposed rule is designed to mitigate project-related emissions impacts by ensuring that emissions will not exceed the levels forecasted in the Draft PEA. The comment contends, however, that the caps on the use of offset credits contained in the proposed rule are not enforceable. (Comment 1-27) Contrary to the statements in the comment, the caps on the use of offset credits built into the proposed rule would act as effective, mandatory limitations on project-related emissions. Under the proposed rule's Backstop Provisions, any time the cumulative net emission increase of a nonattainment air contaminant from both major and minor sources exceeds the specified cumulative net emission increase threshold for that contaminant, the SCAQMD would be required to discontinue issuing permits to construct or permits to operate for sources that rely on Rule 1304 exemptions or 1309.1 Priority Reserve offsets for that air contaminant. This requirement would apply even if there are sufficient offsets remaining in the account for the permits. The calculation of cumulative net emissions increases would be based on the maximum amount of emissions allowed ("potential to emit") under each permit that is issued. Because the cumulative net emission increase thresholds that would be imposed by the backstop provisions are derived from the emissions projections used in the Draft PEA's impact analysis, these backstop provisions of the proposed rule will ensure that the level of emissions from implementation of the Proposed Rule will not exceed the level of emissions impacts forecasted in the PEA.

With respect to the comment that the 2009 legislation (SB 827 and AB 1318) shows that the caps on use of emissions credits will not be effective, see Responses to Comment 1-23.

The comment also suggests that the public would not be able to track credit use, and therefore the cumulative net emission increase thresholds would not be enforceable by the public. However, the proposed rule includes detailed provisions directing the Executive Officer to track credit use, to calculate cumulative net emissions increases for each tracked air contaminant and compare the results to the cumulative net emissions increase thresholds included in the proposed rule, to report the findings to the Governing Board, and to take corrective action if a threshold is exceeded or if an exceedance is projected. This entire process will be disclosed to the public.

The comment further suggests that the limitations on emissions would not be effective because the “reporting will come too late to prevent the environmental harm caused by exceeding the cap.” The procedure for tracking of cumulative net emissions increases is designed to prevent permit issuance relying on the internal offset accounts until the cumulative net emissions increase has returned to a level at least ten percent below the applicable threshold. The inherent lag in the process is the very reason that, under the proposed rule, the Executive Officer would be required to project two years of future cumulative net emissions increases on an annual basis. Such projections should identify a potential threshold exceedance before it occurs and help prevent it from actually occurring. Finally, the Executive Officer and SCAQMD staff would monitor trends in offset generation and use, as well as in cumulative net emissions increases, with an eye to identifying and responding to potential threshold exceedances or offset account deficits before they are realized.

For a discussion of the project description and baseline issues referred to in comment 1-27, see Responses to Comments 1-8 and 1-24.

Potential for future changes to rules relating to use of credits. Comment 1-28.

The response to this comment is included in the Responses to Comment 1-23.

Draft PEA’s treatment of alternatives and suggestion that Alternative D be adopted. Comment 1-29 and 1-30.

Responses these comments are included in the Responses to Comment 1-11.

In addition, one factor that the Governing Board will consider is the ability of each alternative to accomplish the project objectives. By limiting offset use to those offsets in the internal offset accounts that result from emissions reductions that occur in 2009 and beyond, Alternative D would potentially constrain regional growth. This is because new offsets tracked when a shutdown occurs will often be needed for new or modified sources that replace the shutdown source, and the emissions reductions resulting from the shutdown are discounted when they are tracked offsets. Moreover, the amount of offsets deposited may vary from year to year. During a time of a prosperous economy, demand for new offsets may easily outstrip supply, since both new and existing businesses would be less likely to shut down. Therefore, Alternative D would result in uncertainty concerning whether there would be sufficient offsets to accommodate projected population growth, as stated in the project objectives. Nevertheless, the PEA presents the environmental benefits of Alternative D so that those benefits can be weighed against the alternative’s reduced ability to accomplish the project objectives, and the SCAQMD Governing Board can decide, as a policy matter, whether to approve the alternative.



California Council for Environmental and Economic Balance

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November 8, 2010

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
South Coast Air Quality Management District
Planning, Rule Development & Area Sources
21865 Copley Drive
Diamond Bar, CA 91765-4182

RE: Comments on Program Environmental Assessment for the Re-Adoption of
Proposed Rule 1315– Federal New Source Review Tracking System

Dear Steve,

2-1

The California Council for Environmental and Economic Balance (CCEEB) is a coalition of business, labor and public leaders that advances strategies for a sound economy and a healthy environment. We have many members that operate facilities and provide large work forces in the South Coast Air Basin. The ability to secure permits from the AQMD is vital to the operations of these companies and to the continued progress of the economic recovery. Rule 1315 forms the cornerstone of the District's New Source Review program and ensures that exempt sources under Rule 1304 and 1309.1 are using valid emission reductions from AQMD's internal offset accounts. A thorough Program Environmental Assessment (PEA) is critical for our members that are eligible for 1304 exemptions and to have access to 1309.1. With this document, CCEEB believes staff has successfully accomplished this task.

2-2

Early on in the environmental review process, AQMD identified alternatives to the "project" (re-adoption of proposed Rule 1315) that were rejected as infeasible in the scoping process:

- Prohibit the use of offsets from shutdowns or reductions at minor sources to demonstrate equivalency with federal offset requirements
- Prohibit the use of any credits not previously recognized prior to adoption of rule
- Allow fossil fueled power plant projects access to AQMD's internal offset accounts
- Other project alternatives suggested by the Superior Court
- Issue offsets to priority projects first

We concur with the elimination of these alternatives based on the following CEQA Guidelines:

- Failure to meet most of the project objectives
- Infeasible as defined by CEQA Guidelines, Section 15364

- 2-2
Cont. ↑
- Inability to avoid significant impacts (CEQA Guidelines, Section 15126.6 (c))
- In terms of the remaining alternatives described in the PEA, AQMD Rule 110, which implements the District's certified regulatory program, does not impose any greater requirements for a discussion of project alternatives in an environmental assessment than is required for an EIR under CEQA. As such, the document describes a range of alternatives to the proposed project that would attain most of the project objectives, but would avoid or lessen some of the effects of the project. The PEA also analyzes the effects of the "no project" alternative, as required by CEQA.
- 2-3
- CCEEB strongly supports the adoption of the project as proposed* and opposes the adoption of any of the five (5) alternatives, either in part or in its entirety, or variations thereof.
- 2-4
- Alternative A – No Project Alternative (No Re-Adoption of Rule 1315)
We oppose this alternative, as we believe it would be extremely harmful to the region's economic recovery. While we await the re-adoption of Rule 1315, the region is relying on the language contained in SB 827 (Wright, 2009) as a means to have a valid credit system to support the District's New Source Review program. However, SB 827 contains a sunset provision of May 1, 2012. Without additional legislative action, the failure to gain federal approval of a re-adopted Rule 1315 would trigger another permit moratorium as the region experienced in 2009.
- 2-5
- Alternative B – Offset User Fees for Large Businesses
The alternative looks at charging a fee for large businesses using the Rule 1304(d) exemption. The fee would be set at a level higher than the cost of purchasing ERCs. We need only look back at the experience during the permit moratorium to recognize the significant impact this option would cause to businesses. The private credit markets play a vital role to the NSR program and CCEEB supports that structure. However, the moratorium showed that businesses of all sizes rely on Rule 1304(d). Charging a fee higher than market rates would essentially eliminate this option. CCEEB opposes this alternative.
- 2-6
- Alternative C – Large Businesses Prohibited from Accessing Rule 1304 Exemptions
While Alternative B sets an extremely high cost to allow use of Rule 1304(d), this alternative is an outright prohibition. Without access to the 1304 Offset Budget, it would be exceedingly difficult for large businesses to achieve facility modernization. Implementation of this alternative would result in significant adverse impacts to facilities containing stationary pollutant sources that qualify to receive emissions offsets available from the AQMD's 1304 offset account. Impacts associated with limiting access to 1304 have not been analyzed and quantified in the PEA.
- Furthermore, this alternative fails to meet the main project objective to continue to administer its NSR program for major and minor sources for facility modernization. As documented in the PEA, facility modernization results in increased efficiency and reduction in air pollution. As older units are replaced with new ones, environmental benefits are achieved and result in fewer criteria pollutant, toxic and GHG emissions. CCEEB strongly opposes this alternative.
- 2-7 ↓
- Alternative D – Use of Credits Generated in 2009 and Beyond Only
This alternative would drastically reduce the credits available for use under Rule 1304 and 1309.1 by eliminating the District's existing offset accounts. CCEEB is aware of the extraordinary effort the District has undertaken with EPA over the past several years to verify the balances of credits in the District's offset accounts. We believe the agreement reached between the two agencies is sound and provides the needed assurance that the balances in the District's offset accounts are

2-7
Cont.

valid. Elimination of these accounts would be detrimental to the businesses relying in Rules 1304 and 1309.1. CCEEB opposes this alternative.

2-8

Alternative E – Limited Offset Availability

This alternative would essentially impose a 50 percent cap on the use of credits from the District's internal accounts. CCEEB believes this option would place an undue hardship on businesses intending to use Rules 1304 and 1309.1 without a justified benefit to the environment. CCEEB opposes this alternative.

2-9

In conclusion, CCEEB supports the project as proposed by staff (the re-adoption of proposed Rule 1315) and we oppose each of the alternatives presented in the PEA.

Please feel free to contact me if you wish to discuss our comments in further detail.

Thank you for considering our views.

Sincerely,



Vice President and Chief Operating Officer

cc: Gerald D. Secundy
Members, South Coast Air Project

COMMENT LETTER NO. 2

CALIFORNIA COUNCIL FOR ENVIRONMENTAL AND ECONOMIC BALANCE

November 9, 2010

Response to Comment 2-1

In addition to including information about the organization submitting comment letter #2, the comment states that a thorough PEA is necessary to analyze impacts from the proposed project and that the SCAQMD has successfully accomplished this task. These comments are noted and no further response is required.

Response to Comment 2-2

The comment lists the potential alternatives that were rejected during the scoping process and agrees with elimination of these alternatives from detailed consideration in the Draft PEA. The comment also notes that the PEA includes a range of alternatives, including a no project alternative and expresses the view that legal requirements relating to alternatives have been met. These comments are noted and no further response is required.

Response to Comment 2-3

The comment states support for the proposed project and opposition to adoption of one of the project alternatives or variations on those alternatives. These comments are noted and no further response is required.

Response to Comment 2-4

The comment opposes adoption of Alternative A, the No Project Alternative, noting that after SB 827 sunsets on May 1, 2012, a permit moratorium would again be in effect. The comment also states that CCEEB believes that Alternative A would be extremely harmful to the region's economic recovery. These comments are noted and no further response is required.

Response to Comment 2-5

The comment states that CCEEB opposes Alternative B asserting that it would effectively eliminate the option of relying on Rule 1304(d) for affected businesses because the fee would be set higher than the cost of purchasing ERCs. These comments are noted and no further response is required.

Response to Comment 2-6

The comment states that under Alternative C, large businesses that previously qualified for an exemption from offsets pursuant to Rule 1304 would no longer be able to modernize. The comment states that CCEEB opposes Alternative C on that ground. With respect to the impacts of Alternative C, Chapter 6 of the Draft PEA includes a comprehensive analysis of direct and indirect air quality, health, visibility and greenhouse gas impacts, while Chapter 7 includes a comprehensive analysis of indirect impacts. In general, the analysis of air quality, health, visibility and greenhouse gas impacts and indirect impacts from Alternative C shows they would be significant, but less than the proposed project. As noted in the comment, the Draft PEA also recognizes that facility modernization results in increased efficiency and reduced air pollution, and that replacement of older units with new ones provides environmental benefits in terms of reduced emissions.

Response to Comment 2-7

The comment states that CCEEB is opposed to Alternative D because it would reduce the available credits and would be detrimental to businesses relying on Rules 1309.1 and 1304. These comments are noted and no further response is required..

Response to Comment 2-8

The comment states that CCEEB is opposed to Alternative E because it would place undue hardships on facilities attempting to seek an exemption from offsets pursuant to Rules 1304 and 1309.1 with no justified benefit to the environment. These comments are noted and no further response is required..

Response to Comment 2-9

The comment states that CCEEB supports the proposed project and is opposed to the project alternatives. These comments are noted and no further response is required..

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File No. 018282-0000

November 9, 2010

VIA EMAIL

Mr. Michael Krause
(c/o CEQA Section, Planning, Rule Development and Area Sources)
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4182
mkrause@aqmd.gov

Re: Comments on Draft Program Environmental Assessment for Re-adoption of Proposed Rule 1315

Dear Mr. Krause:

3-1 On behalf of the Regulatory Flexibility Group, we submit these comments on the South Coast Air Quality Management District's (SCAQMD) Draft Program Environmental Assessment (PEA) prepared for the re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System.¹ We wish to direct the SCAQMD's attention to two issues: (1) the PEA's ultra-conservative analysis of air quality impacts; and (2) flaws in two of the PEA's proffered alternatives.

Ultra-Conservative Analysis

3-2 The PEA's analysis of projected air quality impacts from the re-adoption of Rule 1315 is ultra-conservative. While such conservatism may be an appropriate strategy to minimize litigation risk under the California Environmental Quality Act, it also leads to the PEA overstating environmental impacts caused by the re-adoption of Rule 1315. We submit these comments to provide perspective for the PEA's analysis of projected air quality impacts. Examples of the PEA's conservatism are listed below:

¹ Pursuant to a SCAQMD notice dated October 15, 2010, the public review and comment period for the Draft PEA was extended an additional 14 days, ending on November 9, 2010. The notice is available at <http://www.aqmd.gov/ceqa/documents/2010/aqmd/draftEA/1315/NOC-extension.pdf> (last visited 11/5/2010).

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- 3-3
 - The PEA arbitrarily adds an additional 15 percent to the air emission projections for each pollutant.
- 3-4
 - The PEA assumes all increases in permitted stationary source emissions would be attributable to re-adoption of Rule 1315. While Table 4.0-1 in the PEA indicates that the historic share of emissions from sources permitted under Rules 1304 and 1309.1 is high, the PEA's assumption nevertheless is conservative. Moreover, as explained in the 2007 Air Quality Management Plan (AQMP), permitted stationary sources represent a very small fraction of the SCAQMD's overall inventory – area, off-road, and on-road sources collectively account for the overwhelming majority of emissions.²
- 3-5
 - The PEA generally fails to take full credit for the benefits associated with projects permitted under Rules 1304 and 1309.1. In particular, such projects often result in the replacement of older sources that are less efficient and have less effective pollution controls.
- 3-6
 - The PEA's "without project condition" is similarly conservative; it assumes that none of the 2007 AQMP's projected growth in stationary source emissions from industry categories potentially eligible to receive permits under Rules 1304 and 1309.1 would occur. This assumption overstates emissions attributable to the re-adoption of Rule 1315 because emissions growth comes from three types of stationary sources (i.e., existing sources for which no new or modified permits are needed or from non-permitted sources, sources receiving permits based upon private-market emission reduction credits, and increased emissions from sources receiving permits issued under Rules 1304 and 1309.1 in reliance upon the SCAQMD internal account offsets), of which only the third component would be affected by the project.
- 3-7
 - The rate of shutdowns would be slower under the "without project condition" than it has been in the past because without the SCAQMD internal account offsets, there would be fewer new sources receiving permits, so there would be less competition from new sources, and existing sources would be expected to stay in operation longer to meet demand. Nonetheless, the PEA does not quantify this phenomenon and instead uses the historical rate of shutdowns.
- 3-8
 - Further, "as a safety margin," the PEA adds an additional 10 percent to the emission reductions from shut downs for NOx, SOx, and PM10 and 20 percent for VOC.
- 3-9
 - The PEA's assumes that emissions attributable to sources permitted pursuant to SB 827 and AB 1318 actually were approved under re-adopted Rule 1315, further overestimating environmental impacts.
- 3-10

Flawed Alternatives

PEA Alternatives B and C would be counterproductive if selected, in whole or in part, by the Governing Board. The SCAQMD previously has determined that Rule 1304 projects are environmental and/or economically beneficial to society, which is why they are exempt from the

² See 2007 AQMP, Appendix III, Figures 2-2, 2-3, 2-4, 2-5 (illustrating 2002 inventory); 2007 AQMP, Chapter 3, Figure 3-3 (illustrating projected 2023 inventory).

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3-10
Cont.

↑ requirement to provide their own offsets.³ For example, Rule 1304 exemptions provide an incentive for the development of resource recovery projects, which convert waste products into useful energy and reduce our collective dependence on fossil fuels. Rule 1304 exemptions also allow air pollution control and regulatory compliance projects to proceed.

As acknowledged by the PEA, if Alternatives B and C are implemented, fewer facilities would be able to obtain permits for new or modified sources. This reduction in the use of Rule 1304 would impede achievement of the project objectives identified in the PEA.⁴ Such projects should continue to be encouraged via the Rule 1304 exemptions – regardless of the size of their proponent. Accordingly, Alternatives B and C should be removed from the PEA.

Best regards,



Michael J. Carroll
of LATHAM & WATKINS LLP

cc: Regulatory Flexibility Group
Robert Wyman
Joshua Bledsoe

³ See, e.g., SCAQMD Governing Board Meeting February 14, 1997, Agenda Item No. 25 (“Several offset exemptions are provided in Rule 1304 in keeping with the AQMD’s policy for fair and equitable treatment of business. While a complete explanation may be found in earlier staff reports for Regulation XIII revisions, most of these exemptions are either beneficial to the environment or driven by severe economic needs.”)(available at <http://www.aqmd.gov/hb/1997/970225a.html>)(last visited 11/9/2010).

⁴ See PEA at 2-20 (“The project objectives are as follows: ... 1) allow facility modernization which will increase efficiency and reduce air pollution, 2) allow facilities to install pollution control equipment, 3) allow emergency equipment to be installed, 4) allow permitting of equipment necessary for essential public services and small emitters, 5) allow operation of portable equipment and other sources determined as a policy matter to be exempt from offsets or eligible for Priority Reserve credits, and 6) take into account environmental and socioeconomic benefits as well as environmental and socioeconomic impacts....”).

COMMENT LETTER NO. 3

LATHAM & WATKINS

November 9, 2010

Response to Comment 3-1

The comment identifies two issues that are discussed in more detail in subsequent comments. These comments are noted and no further response is required..

Response to Comment 3-2

The comment notes that the Draft PEA’s analysis of projected air quality impacts of adopting Proposed Rule 1315 is “ultra-conservative,” and states that it overstates projected air quality impacts. The methodology used in the Draft PEA to assess project-related emissions was designed to provide the most realistic evaluation that can be provided of the project’s emissions impacts given the inherent difficulties of making such forecasts over a 20-year time horizon. To ensure that potential emissions impacts are not understated, where parameters for analysis fall within a range or for other reasons could not be precisely defined, the Draft PEA employs conservative assumptions so that the analysis in the Draft PEA would not underestimate impacts.

Responses to Comments 3-3 through 3-9.

Comments 3-3 through 3.9 list what the comment refers to as examples of the Draft PEA’s conservatism in its analysis of projected air quality impacts attributed to the project. The comments generally summarize various premises of the impact analysis which may result in project-related impacts being overstated to some degree. It should be noted that each of the premises referred to in the comments are discussed in the Draft PEA so that the methodology used is fully described.

Response to Comment 3-10

The comment states that adopting Alternatives B or C in whole or in part would be counterproductive because the SCAQMD has previously concluded that Rule 1304 projects are environmental and/or economically beneficial to society in determining to allow them to be exempted from the requirement to provide their own offsets. The comment also states that Rule 1304 exemptions allow air pollution control and regulatory compliance projects to proceed. With respect to the suggestion in the comment that Alternatives B and C be “removed from the PEA” because they would impede achievement of project objectives, it should be noted that the alternatives discussed in the Draft PEA are presented in provide an evaluation of a range of alternatives to the project as proposed for consideration by the decision makers. The ultimate decision about what action to take regarding the proposed project and the alternatives discussed in the Draft PEA will be made by the SCAQMD Governing Board.



ANTONIO R. VILLARAIGOSA
Mayor

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THOMAS S. SAYLES, *Vice-President*
ERIC HOLOMAN
CHRISTINA E. NOONAN
JONATHAN PARFREY
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AUSTIN BEUTNER
General Manager
RAMAN RAJ
Chief Operating Officer

November 9, 2010

Mr. Michael Krause
Program Supervisor, CEQA Section
South Coast Air Quality Management District
Planning, Rule Development & Area Sources
21865 Copley Drive
Diamond Bar, California 91765

Dear Mr. Krause:

Subject: Comments on Program Environmental Assessment for the Re-Adoption of
Proposed Rule 1315 – Federal New Source Review Tracking System

4-1

Thank you for the opportunity to submit comments on the Program Environmental Assessment (PEA) for proposed Rule 1315. The purpose of the document is to evaluate the environmental impacts associated with the re-adoption of Rule 1315 – Federal New Source Review (NSR) Tracking System. Proposed Rule 1315 ensures that exempt sources under Rule 1304 are fully offset to the extent required by federal law, using valid emission reductions from the South Coast Air Quality Management District's (SCAQMD) internal offset account. Accordingly, the proposed PEA intends to provide an overall analysis of the direct and indirect impacts of sources expected to receive permits under Rules 1304 and 1309.1 through 2030.

4-2

The Los Angeles Department of Water and Power (LADWP), a proprietary department of the City of Los Angeles, is the nation's largest municipally owned utility with a net maximum plant capacity of 7,977 megawatts and net dependable capacity of 7,226 megawatts as of December 31, 2009. LADWP is the sole owner and operator of four (4) in-basin natural gas-fired power plants. With a strong commitment toward a greener future, LADWP has been implementing a massive modernization program at all four in-basin power plants over the past decade. There is an urgent need to upgrade existing generating units since most of these units were built in the late 1950s and early 1960s.

Through the process known as "repowering," older, higher polluting units are being replaced with new, state-of-the-art equipment that conserves fuel, and reduces greenhouse gas (GHG) and Nitrogen Oxide (NOx) emissions, and other environmental impacts. The new units are also needed to provide transitional energy as LADWP integrates more renewable resources into its grid. As a result of more than \$1 billion spent on modernizing Haynes and

Water and Power Conservation ... a way of life

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- 4-2
Cont.
- Valley Generating Stations and installing pollution control equipment, LADWP has reduced its NOx emissions in the South Coast Air Basin by over 90 percent.
- The ability to secure permits from the SCAQMD and utilize Rule 1304 exemptions has been crucial to the continued progress of the power plants' in-basin modernization. As such, a thorough PEA is critical to LADWP's strategic facility modernization. Rule 1315 forms the cornerstone of the District's NSR program and provides the necessary accounting for the Rule 1304 internal offset account that LADWP has relied upon. Previous access to Rule 1304 exemptions has allowed LADWP to implement facility modernization which increases efficiency and reduces air pollution.
- 4-3
- The PEA describes a range of alternatives to the proposed project that would feasibly attain most of the project objectives but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Section 15126.6). The PEA also analyzes the effects of the "no project" alternative, as required by CEQA.
- 4-4
- LADWP supports the adoption of the project as proposed*** and believes that the adoption of any of the five (5) alternatives, either in part or in its entirety, or variations thereof would not be consistent with the CEQA Guidelines. We support the elimination of any project alternatives based on the following CEQA criteria:
- Failure to meet most of the project objectives
 - Infeasible as defined by CEQA Guidelines, Section 15364
 - Inability to avoid significant impacts (CEQA Guidelines, Section 15126.6 (c))
- 4-5
- The following are specific comments on the PEA as it relates to potentially significant impacts to the progress of LADWP's in-basin plant modernization program:
- Alternative C – Large Businesses Prohibited from Accessing Rule 1304 Exemptions**
This Alternative has potentially significant impacts to LADWP operations and the overall in-basin power plant modernization program. Without access to the Rule 1304 offset account, it would be exceedingly difficult for any new projects to go forward. Implementation of this alternative would result in significant adverse impacts to LADWP and its ability to receive emissions offsets from SCAQMD's Rule 1304 offset account. Direct and indirect impacts to power plants associated with limiting or capping access to Rule 1304 offsets would need further analysis if this alternative were selected.
- In addition, this alternative may not meet the main project objective, allowing SCAQMD to continue to administer its NSR program for major and minor sources for purposes of facility modernization. As documented in the PEA, facility modernization results in increased efficiency and reduction in air pollution. As older units are replaced with new ones,

Mr. Michael Krause
Page 3
November 9, 2010

4-5
Cont.

↑ environmental benefits are achieved and results in fewer criteria pollutant, toxic and GHG emissions.

4-6

Equivalency Backstop Provisions

The backstop provision would require SCAQMD to discontinue issuing permits to major sources that rely on the offset accounts resulting from the use of Rule 1304 exemptions. It also establishes the procedure for SCAQMD to demonstrate and restore access to the internal accounts. If the cap is exceeded for any pollutant, SCAQMD would deny permits to applicants that require offsets from the internal offset account until consistency with the cap is restored. However, it is not clear how long a major source would be on hold until access to the offset accounts is restored. The PEA should discuss in more detail impacts to large facilities, such as LADWP that are currently in the process of implementing re-powering projects in the next several years and will rely on Rule 1304 exemptions to complete their projects. Denying access would have significant impacts on operations. A clear method of expediting access to the Rule 1304 offset account should be included in the backstop provision in order to minimize potential impacts.

I appreciate your consideration of these comments and look forward to SCAQMD's final PEA. Should you have any questions, please contact Ms. Leila Barker at (213) 367-2743.

Sincerely,



Mark J. Sedlacek
Director of Environmental Affairs

LB:db
c: Ms. Leila Barker

COMMENT LETTER NO. 4

DEPARTMENT OF WATER AND POWER

November 9, 2010

Response to Comment 4-1

The comment provides general comments on the purpose of the PEA for the proposed project including the analysis of direct and indirect impacts from sources expected to receive permits under Rules 1304 and 1309.1 through 2030. These comments are noted and no further response is required..

Response to Comment 4-2

The comment provides information about the Department of Water and Power, including the need to upgrade existing generating units since most of these units were built in the late 1950s and early 1960s. The comment further explains that the ability of LADWP to secure permits from the SCAQMD through Rule 1304 exemptions has been important to the continued progress for in-Basin facility modernizations which increase efficiency and reduce air pollution. These comments are noted and no further response is required..

Response to Comments 4-3 through 4-5.

The comments indicate that the Draft PEA describes a range of reasonable alternatives and state that LADWP supports adoption of the project as proposed, while adoption of any of the five alternatives, or variations on those alternatives, would not be consistent with the CEQA Guidelines relating to the alternatives. Comment 4-5 states that Alternative C could significantly affect LADWP operations and the overall in-Basin power plant modernization program. The comment states that without access to Rule 1304 offset accounts it would be extremely difficult for new projects to go forward due to the difficulty of LADWP receiving offsets from the Rule 1304 offset account. The comment also states that Alternative C may not meet the main project objectives relating to continued administration of the NSR program for purposes for facility modernization which results in reduced emissions as older units are replaced. These comments are noted and no further response is required.

Response to Comment 4-6

The comment notes that the backstop provisions of the proposed rule would require the SCAQMD to discontinue issuing permits to major sources that rely on the offset accounts under the Rule 1304 exemptions. It notes that denying access to operations in such a situation would have a significant effect on LADWP's operations. Under proposed rule 1315, the SCAQMD Executive Officer would be required to project two years of future cumulative net emissions increases on an annual basis. This procedure should identify a potential threshold exceedance before it occurs so that an exceedance would be prevented from occurring. The Executive

Officer and SCAQMD staff would monitor trends in offset generation and use, as well as in cumulative net emissions increases, in order to identify and respond to potential threshold exceedances or offset account deficits before they occur.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

November 9, 2010
File No.: 31-380.10

Steve Smith, Ph.D.
Program Supervisor-CEQA Section
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Mr. Smith:

**Draft Program Environmental Assessment
Re-Adoption of Proposed Rule 1315
Federal New Source Review Tracking System**

5-1

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to comment on the Draft Program Environmental Assessment (DPEA) for the re-adoption of PR 1315 - Federal New Source Review Tracking System. The Sanitation Districts provide environmentally sound, cost-effective wastewater and solid waste management for about 5.7 million people in Los Angeles County and, in the process, convert waste into resources such as reclaimed water, recycled materials and approximately 128 MW of renewable electrical energy. The Sanitation Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated territory within the County through a partnership agreement with 23 independent special districts.

Our review of the DPEA documents leads us to recognize the prodigious effort on the part of your staff and consultants in performing such a comprehensive analysis. We appreciate the thoroughness of the effort and in particular the supporting calculations and modeling analyses that are included in the appendices.

5-2

The Sanitation Districts support SCAQMD's proposed project and discourage the adoption of any of the project alternatives. Implementation of Alternative A, the NO PROJECT alternative, would adversely impact essential public services and businesses alike in that neither entity could modernize or replace their aging infrastructure or facilities beyond their useful lives. Also, neither entity could provide the infrastructure or services and jobs needed to accommodate projected, inevitable population growth. As you correctly state in Chapter 7, this alternative would also have a significant adverse effect on the production of renewable energy such as what was witnessed during the recent permit moratorium at the Palos Verdes Landfill.

Realization of Alternative A would also restrict even the most fundamental health protective and safety oriented projects. Emergency standby generators could not be installed at sewage lift pump stations, in an abundance of caution, to prevent spilling of raw, untreated

5-2
Cont.

sewage into the neighboring streets. Similarly, emergency flares to combust excess gases both at landfills and sewage treatment plants would be denied, potentially jeopardizing public health.

5-3

The remaining project alternatives B through E limit offset availability to businesses alone or to both businesses and essential public services. While essential public services might be treated more favorably than businesses in some of these project alternatives, we believe that any such restriction ultimately impacts the economic vitality of the region.

5-4

Other minor comments are as follows:

- Subchapter 3.6 Existing Setting-Energy

We believe the description of the future of distributed generation (DG) on Page 3.6-5 is much too sanguine. Incremental amounts of distributed generation (~100 MW per year) might have been the case in years past but with new rules mandating central utility emission standards on such units, we do not believe there will be continued development at this rate. The lack of future smaller DG projects only serves to underline the importance of a viable credit supply for energy supply alternatives for the region.

5-5

- Subchapter 5.8 Indirect Environmental Impacts-Hazards and Hazardous Materials

On Page 5.8-43 of this section, in the FSA paragraph, it should be mentioned that the *reason* for the use of certain listed chemicals is for air pollution control (aqueous ammonia) or water pollution control, as the case may be.

Again, we greatly appreciate the staff's effort on assembling this important document. We support the recommended project and the speedy adoption of the proposed rule.

Very truly yours,
Stephen R. Maguin



Gregory M. Adams
Assistant Departmental Engineer
Air Quality Engineering
Technical Services Department

GMA:DLR:bb

cc: Barry Wallerstein - SCAQMD
Barbara Baird - SCAQMD
Elaine Chang - SCAQMD

COMMENT LETTER NO. 5

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

November 9, 2010

Response to Comment 5-1

The comment provides general information about the County Sanitation Districts of Los Angeles County. Further, the comment states that the analysis in the Draft PEA of the proposed project and supporting documentation is comprehensive. These comments are noted and no further response is required.

Response to Comment 5-2

The comment states that CSDLAC supports the proposed project and discourages adopting Alternative A, the No Project Alternative. The comment states that adopting Alternative A would adversely impact essential public services and businesses because neither would be able to modernize or replace their aging infrastructure and it would also adversely affect the production of renewable energy. The comment also states that Alternative A would restrict fundamental health protective and safety oriented projects such as emergency generators and flares potentially jeopardizing public health. These comments are noted and no further response is required.

Response to Comment 5-3

The comments state that Alternatives B through E would limit offset availability to businesses and/or essential public services, which would affect the economic vitality of the region. These comments are noted and no further response is required.

Response to Comment 5-4

The comment states that the Subchapter 3.6 description of distributed generation (DG) is too optimistic. Further, the commentator states that future development of DG at an average of 100 MWs per year is unlikely to occur. As a reminder, the subchapters in Chapter 3 describe the existing setting for each of the environmental categories to be evaluated in Chapters 4 and 5 of the PEA. The information about DG, in particular the rate of growth of 100 MWs per year is based on historical information as noted in the text. A lower level of DG than described in subchapter 3.6 would not affect the impact analysis for the impacts of the proposed project.

Response to Comment 5-5

The comment states that on page 5.8-43 it should be mentioned that the reason certain chemicals are listed in the Final Staff Assessments (FSAs) is that they are for pollution control, e.g., aqueous ammonia. The majority of the discussion of hazardous materials is related to lubricants,

solvents, paints, etc. On page 5.8-45 aqueous ammonia is mentioned. However, it should be specifically noted, as requested by the comment letter, that aqueous ammonia is used for air pollution control.

Walnut Creek Energy, LLC

October 26, 2010

Mr. Michael Krause
CEQA Section, Planning, Rule Development and Area Sources
South Coast Air Quality Management District (SCAQMD)
21865 Copley Drive
Diamond Bar, California 91765-4182

VIA FACSIMILE (909- 396-3324)
VIA EMAIL TO mkrause@aqmd.gov

Subject: Comments on Proposed Rule 1315 DRAFT Program Environmental Assessment (PEA)

Dear Mr. Krause:

In response to your September 8, 2010 notice regarding the DRAFT Program Environmental Assessment (PEA) of Proposed Rule 1315, we have reviewed the PEA and have significant comments and questions that are detailed below.

6-1

Walnut Creek Energy Park [CEC Docket # 05-AFC-2c] is a licensed site under the CEC's CEQA equivalent process. As part of the CEC licensing process, the South Coast Air Quality Management District (SCAQMD) has previously analyzed the project air quality and human health impacts and issued Determinations of Compliance. The CEC Commission approved a Final Decision on February 27, 2008.

In the DRAFT PEA of Proposed Rule 1315 SCAQMD staff reaches unprecedented conclusions regarding project-specific impacts that are not supported by the extensive Walnut Creek CEC docket record or well-established procedures for evaluating ambient air quality impacts and human health risks for gas-fired project in SCAQMD and the CEC.

The methodology in the PEA does not follow well-established industry procedures and uses analyses that do not apply to specific projects.

6-2

There are well-established industry standard procedures and peer-reviewed processes for analyzing the ambient air quality and human health risk impacts as part of the environmental analysis for a proposed project. The estimate of potential increase in the annual adult mortality is the result of the region-wide assessment of particulate emissions applicable to air quality planning, but not a specific project.

On page 4.1-39, second paragraph, the document states "*Based on this methodology, the SCAQMD estimates that there may be an increase in annual adult mortality of 1.77 persons in the area of the Walnut Creek Energy Park . . .*" As noted above, this estimate is the result of

Walnut Creek Energy, LLC

6-2
Cont.

region-wide assessment of particulate emissions and should not be directly related to the impact from a specific project.

This PEA contradicts SCAQMD's more detailed analysis contained in its Final Determination of Compliance for Walnut Creek Energy Park (WCEP), in which SCAQMD found the human health impacts from the project to be below significance thresholds.

Rule 1401 – New Source Review of Toxic Air Contaminants:

This rule specifies limits for maximum individual cancer risk (MICR), acute hazard index (HIA), chronic hazard index (HIC) and cancer burden (CB) from new permit units, relocations, or modifications to existing permits which emit toxic air contaminants. Rule 1401 requirements are summarized as follows:

Table 21 – Rule 1401 Requirements

Parameters and Specifications	Rule 1401 Requirements
MICR, without T-BACT	$\leq 1 \times 10^{-6}$
MICR, with T-BACT	$\leq 1 \times 10^{-6}$
Acute Hazard Index	≤ 1.0
Chronic Hazard Index	≤ 1.0
Cancer Burden	≤ 0.5

The applicant performed a Tier 4 health risk assessment using the Hot Spots Analysis and Reporting Program (HARP, version 1.2a). The analysis included an estimate of the MICR for the nearest residential and commercial receptors, the acute and chronic hazard indices for the entire facility. PRA modeling staff reviewed the applicant's methodology and procedures used, and re-ran the HARP model and verified the health risk and hazard indices which were presented by the applicant. PRA staff concluded that each of the health risk values for MICR, HIA and HIC were appropriately estimated (see memorandum in file, dated August 30, 2006 from Ms. Jill Whynot to Mr. Mike Mills). Table 22 below is a summary of the modeled health risk assessment results. The cancer burden is not calculated because the MICR is less than 1×10^{-6} for both residential and commercial receptors.

6-3

Table 22 – Rule 1401 Modeled Results

Risk Parameter	Residential	Commercial	Rule 1401 Requirements	Compliance (Yes/No)
MICR	6.23×10^{-7}	1.06×10^{-6}	$\leq 1 \times 10^{-6}$	Yes
HIA	0.0635	0.000879	≤ 1.0	Yes
HIC	0.0124	0.0000156	≤ 1.0	Yes
Receptor UTM	413480E / 3764940N	413123E / 3763141N		

Table 22 shows that WCEP will comply with the applicable requirements of Rule 1401. The cancer burden is not computed because the highest MICR (in this case, the residential MICR) is less than 1×10^{-6} .

SCAQMD's conclusion regarding the insignificance of WCEP's air quality impacts is corroborated by the Final Staff Assessment prepared by the California Energy Commission, which states:

“With the inclusion of Conditions of Certification AQ-SC1 through AQ-SC12 and Conditions of Certification AQ-1 through AQ-16 herein, staff concludes that the Walnut Creek Energy Project will comply with all applicable laws, ordinances, regulations and statutes and that the air quality emission impacts from construction and operation of the project are mitigated to a level of insignificance.”

Walnut Creek Energy, LLC

The analysis in the Rule 1315 PEA is, not only inapplicable to a specific project, it exaggerates the potential impacts.

On page 4.1-3, the report states that “with respect to the health effects associated with region-wide emissions of criteria pollutants, the SCAQMD has not adopted formal significance thresholds for health impacts of ozone and PM2.5, as distinguished from the concentration-based significance thresholds set forth in Table 4.1-2”.

6-4 Technically, there is an inconsistency if the emission rates in Table 4.1-7 of the PEA have been used to calculate annual emissions, as is implied by Table 4.1-4. The daily maximum emissions shown for WCEP in Table 4.1-7 are the theoretical amounts if WCEP – a peaking power plant – was operated for 24 hours in a day, which it is not permitted to do except during an electrical system emergency. The permit conditions imposed on WCEP limit its operation to no more than 58% of the time in its maximum month and no more than 46% of the year, and the impacts are, therefore, exaggerated and not useful for policy and public decision making.

We question the value and procedural basis for a high-level, superficial analysis of a project that both SCAQMD and CEC have completed extensive and detailed project-specific analyses, concluded that the impacts are less than significant, and the CEC Decision has been approved.

6-5 We fully support SCAQMD’s efforts to advance Rule 1315 and recognize the challenges associated with region-wide air quality planning and impact assessment. We strongly request that SCAQMD staff consider the issues and concerns we have identified. Inconsistent and duplicative analysis can inadvertently create barriers to much-needed infrastructure in California and prevent siting projects like Walnut Creek Energy Park that:

- Use 34% less fuel per megawatt hour generated than the aging coastal fleet.
- Are necessary to replace once-through-cooling at coast power plants in accordance with State Water Resource Control Board’s requirements.
- Can start in ten minutes and prevent running aging units unnecessarily at negative prices because they take hours of startup to be prepared to serve peak loads.
- Are necessary to integrate renewable energy reliability to the South California grid.

Thank you very much for the opportunity to provide comments. Please let us know if you have any questions.

Sincerely,



Jenifer Morris Lee
Managing Director, Environmental

c: Mitch Haimov, SCAQMD
Steve Smith, SCAQMD

COMMENT LETTER NO. 6

WALNUT CREEK ENERGY, LLC

October 26, 2010

Response to Comment 6-1

The comment provides general information on the Walnut Creek Energy Park (WCEP). Impacts from this facility are analyzed in the PEA as contributing to cumulative impacts. The comment also states that the PEA for the proposed project includes “unprecedented conclusions” regarding project-specific impacts that are not supported in the CEC docket record for the WCEP. As already noted, impacts from the WCEP plant are not part of the project-specific analysis of impacts from the proposed project, but are considered as contributing to cumulative impacts.

Responses to Comments 6-2

The comments state the Draft PEA on page 4.1-39 provides a region-wide assessment of particulate emissions which should not be directly related to the impact from a specific project. The reasons for use of this assessment methodology are explained in the Draft PEA on page 4.1-39, as are the uncertainties and limitations in application of such a methodology in the context of a specific facility.

Responses to Comments 6-3.

The comments refer to the SCAQMD’s detailed analysis contained in the Final Determination of Compliance for the WCEP project. The cancer risk, acute health index and chronic health index found in the PEA for the proposed project (Chapter 4, Table 4.1-37, Page 4.1-44) were extracted from the CEC’s Final Staff Assessment (April 2007, Public Health, Table 2, Page 4.7-13) and, therefore, are accurate. The modeled results provided in the comment letter can be found in the same CEC document. Both sets of risk values reach the same conclusion that cancer risk and acute and chronic health impacts from the Walnut Creek project would not exceed the relevant significance thresholds and, therefore, would be less than significant.

Response to Comment 6-4

The comment notes that the mass emissions rates shown for the WCEP in Table 4.1-7 are the theoretical amounts if WCEP, which is a peaking power plant, was operated for 24 hours in a day. It further notes that permit conditions place specific limits on its operation. The mass daily emissions from power plant operations in Table 4.1-7 in the Draft PEA were retrieved from the CEC’s FSA. It is recognized that while equipment will not operate at full capacity, the CEQA analysis in the PEA analyzed the maximum potential impacts from peak operations that could be achieved. The analysis in the PEA does not in any way change the conclusions in the FSA prepared by the CEC or approval status of that project.

Response to Comment 6-5

The comment states support for the proposed project and describes the benefits of the WCEP. This comment is noted and no further response is required.