



November 2, 2016

CONSTRUCTION INDUSTRY AIR QUALITY COALITION

Coalition Members

Mr. Wayne Nastri
Acting Executive Officer
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

Dear Mr. Nastri:

In review of the Revised Draft 2016 AQMP, specifically item CMB-01, we have concerns as they relate to proposed additional emergency engine controls and mandates directed through this AQMP that could jeopardize the reliability of such emergency systems. Additionally we have concerns with the accuracy of data presented and the assumptions behind those numbers.

BACKGROUND

General uses of statements like "Zero emission technology *will be required*, whenever and wherever feasible and cost effective, otherwise near-zero technology *will be required*." (App. IV, top of page IV-A-45), or "Based on this analysis, staff expects a number of diesel ICEs can be replaced with zero or near-zero technology, *but at a minimum Tier 4 standards*." (App- IV, Page IV-A-51) cannot be introduced in the AQMP in reference to emergency engines. These statements imply broad-based mandates for these technologies without properly understanding the limitations of these technologies both in available power and reliability when used in emergency applications required to satisfy building codes for life safety and redundant back-up systems. Zero emission, near zero emission, and Tier 4 standards technologies are also more complicated, and are far more expensive to purchase, install, design into buildings, and maintain than the emergency diesel and gas engines allowed by both EPA and CARB in their NSPS and ATCM regulations respectively.

We also have significant concerns with the accuracy of data presented and the assumptions and extrapolations behind those numbers presented in Tables 1 and 2. We believe that the data is flawed, especially with any reference to emergency engines due to their restricted hours of operation. One only has to look at the 11.5 tons per day (TPD) identified in Table 2 for 3,860 engines permitted post-2010 and compare it to 9,068 older ICEs permitted 2010 and earlier with 11.0 TPD. How can the older engines contribute nearly 1/3 less per engine than the newer engines? This is even more perplexing when you consider the NOx controls on prime power and prime use engines are now controlled to extremely low NOx emissions levels by Rule 1110.2. Preliminary data from our independent sources indicates the contribution from all diesel emergency engines is less than 1.0 TPD. With the overall basin NOx baseline at 530 TPD stated in the Executive Summary, this makes the diesel emergency engines merely a fraction of a percent of the whole, and thus mandates of more expensive systems could not be justified.



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At the AQMP meeting on Thursday one of our CIAQC members and a consultant, who is well versed on emergency engine emissions, met with Aaron Katzenstein, who I understand is the lead/key staff person working on this measure. Feedback from that meeting supports our belief the data is overstated, and indicates staff requires a much better understanding of the limitations of these technologies, the yet-to-be-proven reliability of these systems, and the costs of such systems.

OUR ASK

In order for CIAQC to effectively evaluate the October draft AQMP concerns and **data we respectfully request that we be allowed to review your detailed calculations and assumptions behind the numbers in Table 1 and Table 2.** With your plan to finalize this document for a February 3 Governing Board hearing, **we ask for this information by November 4** to allow us enough time for our independent evaluation and subsequent discussions with staff. We also **ask that staff be directed to remove words that would indicate a mandate of these technologies, and replace such wording only with “incentives”.** CIAQC is not opposed to companies wishing to experiment with new technologies under incentive programs, but we are not in favor of implied mandates within the AQMP that would improperly direct staff to conclude these technologies as BACT for emergency systems.

Thank you for your consideration of our concerns. We are available to meet with your staff to discuss these issues.

Sincerely,



Michael Lewis
Executive Vice President
CIAQC

Cc: Bob Shepherd
Karl Lany
John Dunlap