East Oakland Community Emission Reduction Plan (CERP)

Community Steering Committee Meeting #20

June 13, 2024
Interpretation Instructions

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ENGLISH
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East Oakland AB 617 Community Steering Committee Meeting
June 13, 2024
Welcome

Co-Chairs: Aiyahnna Johnson, Mr. Charles Reed, Mykela Patton
Meeting Objectives

• CSC members will understand what the Air District & CBE are currently doing to address the East Oakland community’s ongoing air pollution concerns, with a focus on Community Health and Commercial & Industrial Sources

• CSC members will receive education on civil rights and Environmental Justice

• CSC members and community will continue crafting Concern Statements and Strategy objectives
Meeting Agenda

- Welcome and Agenda (8 mins, 6:00 - 6:08)
- Spotlight on Environmental Justice (10 mins, 6:08 - 6:18)
- CSC #19 (May) Recap (2 mins, 6:18 - 6:20)
- Commercial & Industrial Sources Presentation/Activity (35 mins, 6:20 - 6:55)
- Break (5 mins, 6:55 - 7:00)
- Strategy Brainstorm: Commercial & Industrial Focus Area (40 mins, 7:00 - 7:40)
- Argent Discussion Report-out (15 mins, 7:40 - 7:55)
- Next Steps and Close Out (5 mins, 7:55 - 8:00)
Initial Meeting Agreements or Notes for Participation

- **One mic, one voice:** If in person, raise your hand to speak. If on Zoom, use Raised Hand function under Reactions at the bottom of your screen.
- Have grace for ourselves and one another.
- Take care of yourself (Stretch, drink water and breathe).
- Mutual respect, empowerment and active listening for all participants.
- To allow everyone to participate, please limit your comments to a speaking time of 2 minutes. We will actively give reminders and alerts.
- ‘Popcorning’ or passing the mic method will be used to encourage participation amongst quieter CSC members.
- **For any questions throughout the meeting:** If in person, please raise your hand to ask a question. If on Zoom, in addition to hand-raising, you may also use the Zoom Chat. CBE and BAAQMD staff will be responding to your questions.
Community Building

In person attendees are encouraged to interact with fellow participants during the dinner/meet and greet.

Virtual attendees, please type into the Zoom Chat:

- Your Name
- Your Pronouns
- Any affiliated organizations

Community building on Zoom: Use Chat and the Reaction emojis to inspire and encourage one another.

Note: CSC members, please raise your hand if you are not able to type into the chat and we will have you speak aloud.
Spotlight on Environmental Justice

Aiyahnna Johnson, Mr. Charles Reed, and Mykela Patton
CSC Co-Chairs
Spotlight on Environmental Justice

The Intersectional History of Environmentalism: https://www.youtube.com/watch?v=cyqYN90PPjE

A Brief History of Environmental Justice: https://www.youtube.com/watch?v=30xLg2HHg8Q
Spotlight on Environmental Justice

Principles of Environmental Justice / Environmental Justice Principles (ejnet.org)
CSC #19 (May) Recap

Carly Cabral, CBE
Objectives of May CSC #19’s West Oakland & Richmond-North Richmond-San Pablo CSC Member Panelist Discussion

- CSC members learned more about CERP components
- CSC members gained insight into West Oakland and Richmond-North Richmond-San Pablo’s CERP process
Objectives of May CSC #19's Transportation & Mobile Sources Breakout Activity

- CSC members worked on Transportation & Mobile Sources strategy development, specifically focusing on:
  - Highways/Freeways
  - Truck-related Businesses/Commercial Trucking
Commercial & Industrial Sources Presentation and Activity

Stephen Reid, BAAQMD, Adele Watts, CBE
Alison Kirk, BAAQMD
Focus on PERMITTED STATIONARY SOURCES (Facilities with sources that have been issued a permit or registered with the Air District)

Assess the top sources of Criteria Air Pollutants (CAPs) and Toxic Air Contaminants (TACs)
# Categories of Pollutants

<table>
<thead>
<tr>
<th>Pollutant Category</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Criteria Air Pollutants (CAPs)</td>
<td>Common air pollutants that harm human health. Regulated based on air quality standards that define “clean” air and “safe” levels of exposure.</td>
<td>Fine particulate matter (PM$_{2.5}$), Carbon monoxide (CO), Sulfur dioxide (SO$_2$)</td>
</tr>
<tr>
<td>Toxic Air Contaminants (TACs)</td>
<td>Over 200 pollutants identified by CARB that are known or suspected to cause cancer or other serious health effects. TACs have NO safe exposure levels.</td>
<td>Diesel particulate matter (DPM), Benzene, Formaldehyde</td>
</tr>
<tr>
<td>Toxicity Weighted Emissions (TWE)</td>
<td>A metric that accounts for the relative toxicity of each individual TAC. Weights their emissions based on their potential health impacts (ex: cancer, asthma, hypertension, eye or respiratory irritation, etc.)</td>
<td>Cancer risk weighted Chronic hazard weighted Acute hazard weighted</td>
</tr>
</tbody>
</table>
### East Oakland's Top Permitted Polluters

<table>
<thead>
<tr>
<th>Category</th>
<th>Polluters</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PM$_{2.5}$</strong></td>
<td>Davis St. Transfer Station, Miller Milling Co., and Peet's Coffee and Tea</td>
</tr>
<tr>
<td><strong>Cancer TWE</strong></td>
<td>Cultured Marble Products and Amazon Services, LLC</td>
</tr>
<tr>
<td><strong>Chronic TWE</strong></td>
<td>PCC Structural and two crematories (Evergreen Cemetery and East Bay Crematory)</td>
</tr>
</tbody>
</table>

#### PM$_{2.5}$ Bar Chart
- Davis St. Transfer Station: 50.9%
- Miller Milling Company: 21.8%
- Peet's Coffee and Tea, Inc.: 13.7%
- Amazon.com Services, LLC: 3.3%
- Cultured Marble Products: 8.8%
- Other: 4.6%

#### Cancer TWE Bar Chart
- Cultured Marble Products: 36.7%
- Amazon Services, LLC: 38.8%
- Other: 9.3%

#### Chronic TWE Bar Chart
- Davis St. Transfer Station: 27.5%
- Miller Milling Company: 25.8%
- Peet's Coffee and Tea, Inc.: 15.6%
- Amazon.com Services, LLC: 4.3%
- Cultured Marble Products: 23.3%
- Other: 4.6%
Locations of Top 10 Permitted Facilities In/Near East Oakland

- The study area is larger than the East Oakland CERP area to capture all the emissions that impact East Oakland’s air quality.
- Most sites below or just above the 880 freeway. (pockets of residential areas very close to these facilities)
- Evergreen Cemetery - surrounded by residential neighborhoods, 3 schools, and a public park.
The Freedom to Breathe campaign is a long standing CBE campaign focused on improving air quality in East Oakland.

- Began in 2007
- Community Education
- ACORN Woodland and EnCompass Academy
- Odor Logging
- Toxic Tours
- Air District Accountability
- Participatory research studies

Focus facilities are identified by community members as impacting residents’ wellbeing

- AB&I Foundry (shutdown October 2022)
- Sterling Environmental
  - Storage/handling of lead & asbestos, sharing a fence with Stonehearst Elementary School
- Argent Materials
  - Concrete & asphalt recycling
- East Bay Crematory
- Other industrial facilities
CBE Advocacy on AB&I
Stationary Source Campaign Example

AB&I was the largest industrial source of air pollution in Oakland. It took a variety of tactics over many years to close AB&I.

Direct Conversation with Polluter
- CBE worked directly with AB&I trying to direct them to change their behavior

Community Education and Organizing
- Empower community to report odors and symptoms to BAAQMD and CARB

Pressure Government Agencies to Use Existing Administrative Procedures
- CARB Notice of Violation (NOV)
- BAAQMD Health Risk Assessment (HRA)
  - Hexavalent Chromium & other toxic emissions documented in first ever HRA of AB&I in 2021

Source: CBE Archive
Lawsuits

- CBE & Attorney General sued because AB&I exposed community to hexavalent chromium without proper warning (Prop 65)
- US EPA investigation
- Public Nuisance filed days after closure

Monitoring Closure, Remediation, & Redevelopment

- Funding for health services and air monitoring
- Ongoing remediation efforts
  - Site purchased by Prologis (warehouse developer)
  - Clean-up overseen by Alameda County Department of Environmental Health
  - CBE tracking clean-up & redevelopment to make sure community has a say and is not further harmed
  - CBE advocates for BAAQMD to develop an indirect source rule
This Air District rule requires facilities with emissions posing significant health risks to create and implement an Air District-approved risk reduction plan.

- CBE sued Air District in response to implementation delays
- Quickly settled
- Air District has a new implementation plan

BAAQMD press release
Questions?
How does the Air District regulate permitted pollution sources? What actions can the Air District take?

1. Rule Development: Creates regulations for permitted sources.
2. Engineering: Applies regulations with permit conditions.
3. Compliance & Enforcement: Verifies regulations & permit conditions are met.
4. Rule Development: If there is an air quality concern, can amend regulations.
Hypothetical Case: The Air District receives an application from an existing permitted source in East Oakland...

“AutoWizards Collision & Repair”

- **Applying to**: Add 2 spray guns, 2 spray booths, and increase usage of cleanup solvent.
- **Location**: Within 1,000 ft of a school in East Oakland
What are the emissions from this source, and what are their health impacts?

**EMISSIONS**

Auto body shops can produce emissions of Toxic Air Contaminants (TACs), including toluene and xylene and metals such as lead.

**HEALTH IMPACTS**

Exposure can cause respiratory diseases, skin rashes, allergic reactions, nerve & brain damage, nausea, organ failure, headache & vomiting.
How does the Air District regulate emissions from “AutoWizards” and protect community health?

<table>
<thead>
<tr>
<th><strong>Rule Requirements</strong></th>
<th><strong>Permitting</strong></th>
<th><strong>Enforcement</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>● The Air District evaluates all regulatory requirements applicable to the source, including: ○ Air District rules ○ State and Federal laws</td>
<td>● During permitting, the Air District can demand changes to the project as outlined in the permit conditions. ○ If the requirements aren't met, the Air District can deny the permit.</td>
<td>● Inspectors check operations, emissions, and records. ● If a violation is found, a Notice of Violation (NOV) is issued, and corrective actions are confirmed. ● Summarize findings in a report.</td>
</tr>
</tbody>
</table>
Examples of Actions that Could Help Reduce Emissions Further

**Engineering:**
- Flag potential rule enhancements during the permit review process for a facility
  - E.g., Rule 2-1; Rule 2-5; Rule 8-45

**Compliance & Enforcement:**
- Conduct targeted inspections at facilities of concern identified by community

**Rule Development:**
- Rule amendments might be evaluated when:
  - Community concerns are raised
  - Air District staff identify areas for improvement
  - New data prompts an evaluation
- Evaluation can include asking
  - When was the rule last amended?
  - Is there opportunity to strengthen it?
  - How well is it working to address emissions and exposures?
  - What have we heard from community?
Your Turn!

- Please go to your assigned breakout groups and have the following ready:
  - Your copy of “A Closer Look at Permitted Sources” report
  - Your worksheet or Jamboard
- Your group will be assigned a top polluter in East Oakland. As a group, use the report to answer scavenger hunt questions about one of these facilities:
  - Davis St. Transfer Station
  - Cremation Services: Evergreen Cemetery & East Bay Crematory
  - Cultured Marble Products
- Choose a scribe and one member of your group to report out: What is one strategy that stood out to you?
- Air District staff will be available in each breakout group to answer questions.
Use the report to answer these questions about your group's assigned facility:

- What is the air quality concern?
- What do you think are health consequences or impacts of the concern on the community?
- What is a rules, engineering, or compliance and enforcement-based strategy that addresses the concern?
- **BONUS QUESTION:** Who are additional partner agencies that should be involved or consulted to address the concern, and why?
Breakout Sessions
One-Minute Report Out:

What is one strategy that stood out to you?
Strategy Brainstorm: Commercial & Industrial Sources

Alesia Hsiao, BAAQMD
East Oakland CERP Vision Statement

**Principles**
- Justice & Equity
- Collaboration & Communication
- Information Sharing & Transparency
- Accountability & Solutions

**Goals**

**Focus Areas**
- Illegal Dumping, Trash & Odors
- Public Health & Community Wellness
- Commercial & Industrial Sources
- Transportation & Mobile Sources
- Built Environment & Land Use

**Strategies**
Activity #2: Instructions for Strategy Development Break Out Sessions

- In your same groups as Activity #1, brainstorm and develop **Concern and Strategy Statements** within the **Commercial and Industrial Sources** Focus Area:

  1. Dust & other Particulate Matter Sources
  2. Commercial, Auto Body & Smaller Businesses
  3. Heavy Industrial, Crematories & other Toxic Sources
Breakout Sessions
Next Steps

- In a future CSC meeting, we will work on brainstorming and developing Built Environment & Land Use Concern and Strategy Statements.
- CBE and Air District staff will synthesize brainstorming information to form Concern and Strategy Statements.
Next Steps: Focus Area to Concern Statement to Strategies

Commercial & Industrial Sources

Concern Statement

Strategy

Strategy

Action

Action

CERP Strategies & Actions

Rulemaking
Permitting
Enforcement
Incentives
Further Research
Education & Outreach

East Oakland AB 617 Community Steering Committee Meeting
June 13, 2024
Questions?
Argent Tour Discussion
Report-Out

Carol Corr, Marina Muñoz, Gabrielle Sloane-Law
Questions?
Fill out the post-meeting survey:

- English: https://forms.gle/B2SYLBNg6aUorF5u6
- Spanish: https://forms.gle/Du8m9thM85jyCy7p7

The next CSC meeting will be held Thursday, July 11th, 2024.
Thank You!

See You Soon!
Appendix Slides: Permitted Emissions Inventory
### Permitted Emissions Inventory: Categories of Sources

<table>
<thead>
<tr>
<th>Source Sector</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permitted Stationary</td>
<td>Stationary sources that are permitted by the Air District and treated as individual facilities in the inventory</td>
<td>Autobody shops; Crematories; Metal recycling businesses</td>
</tr>
<tr>
<td>Unpermitted Stationary</td>
<td>Stationary sources that are not permitted by the Air District and treated as a group in the inventory</td>
<td>Residential fireplaces; Commercial cooking; Construction dust</td>
</tr>
<tr>
<td>On-road Mobile</td>
<td>Mobile sources that operate on roadways</td>
<td>Buses; Passenger Cars; Trucks</td>
</tr>
<tr>
<td>Off-road Mobile</td>
<td>Mobile sources that do not operate on roadways</td>
<td>Aircraft; Locomotives; Ships</td>
</tr>
</tbody>
</table>
Permitted Emissions Inventory: Source sector contributions to PM2.5 emissions, cancer TWE and chronic TWE in East Oakland.
Permitted Emissions Inventory: Detailed information for the Top 10 permitted facilities in East Oakland (ranked in order of PM2.5 emissions).

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Description</th>
<th>Key Pollutants</th>
<th>Key Processes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Davis St. Transfer Station</td>
<td>Recovers materials for reuse, recycling, or composting; facilitates the transfer of trash to the Altamont Landfill in Livermore</td>
<td>PM$_{2.5}$</td>
<td>Stockpiling, green waste transfer building, indoor waste sorting, material processing</td>
</tr>
<tr>
<td>Miller Milling Company</td>
<td>Mills wheat into white and whole grain flours</td>
<td>PM$_{2.5}$</td>
<td>Grain elevator, wheat cleaning house, flour flood loadout system</td>
</tr>
<tr>
<td>Peet's Coffee and Tea, Inc.</td>
<td>Coffee roasting plant</td>
<td>PM$_{2.5}$, formaldehyde</td>
<td>Coffee destoner, gas burner for coffee roaster</td>
</tr>
<tr>
<td>Gallagher &amp; Burk, Inc.</td>
<td>Paving and grading services; construction material supplier</td>
<td>PM$_{2.5}$</td>
<td>Drum mixer, aggregate storage bins</td>
</tr>
<tr>
<td>Waste Management, Inc.</td>
<td>Landfill (closed)</td>
<td>Vinyl chloride, hydrogen sulfide</td>
<td>Landfill gas collection system and flare</td>
</tr>
<tr>
<td>East Bay Crematory</td>
<td>Human cremation services</td>
<td>Mercury, arsenic, hydrochloric acid</td>
<td>Crematory retort</td>
</tr>
<tr>
<td>PCC Structural</td>
<td>Manufactures metal components for aircraft engines</td>
<td>Nickel</td>
<td>Belt grinder, triple gator saw</td>
</tr>
<tr>
<td>Evergreen Cemetery</td>
<td>Human cremation services</td>
<td>Mercury, arsenic, hydrochloric acid</td>
<td>Crematory retort</td>
</tr>
<tr>
<td>Amazon.com Services, LLC</td>
<td>Delivery services warehouse</td>
<td>Diesel particulate matter</td>
<td>Emergency standby generator</td>
</tr>
<tr>
<td>Cultured Marble Products LLC</td>
<td>Manufactures cast polymer composite home fixtures</td>
<td>Styrene</td>
<td>Curing ovens, gelcoat spray booth</td>
</tr>
</tbody>
</table>
Permitted Emissions Inventory: Sensitive Receptors

● Groups of people who are more likely to experience adverse health effects from exposure to air pollution
  ○ Children
  ○ Elderly
  ○ People with respiratory diseases (like asthma or bronchitis)
  ○ People with cardiovascular diseases
  ○ Pregnant people

● Sensitive receptor locations - hospitals, schools, day care centers, and community centers/parks. Also dense residential areas.
Permitted Emissions Inventory: Identifying East Oakland's Top Permitted Processes

Cancer TWE by Device Type for Permitted Sources Impacting East Oakland

- Diesel Engines, 40%
- Curing Ovens, 22%
- Spray Booths, 15%
- Other, 8%
- Human Crematories, 7%
- Gasoline Dispensing, 6%
- Coffee Roasting, 2%
Permitted Emissions Inventory: Permitted Diesel Generators

- Dot size shows the relative number of permitted diesel generators
<table>
<thead>
<tr>
<th>Source/ Process Category</th>
<th>Facility Name(s)</th>
<th>Current Rules/Regulations</th>
</tr>
</thead>
</table>
| Permitted Sources (in general) | - Any permitted source  
- All of the top 10 permitted sources, including Cultured Marble Products and Peet's Coffee and Tea | - Regulation 2: Permits  
- Rule 2-1: General Requirements  
- Rule 2-2: New Source Review (for any new and modified sources)  
- Rule 2-5: New Source Review of Toxic Air Contaminants (for any new and modified sources of toxic emissions) |
| Fugitive Dust (Particulate Matter) | - Davis St. Transfer Station  
- Miller Milling Company  
- Gallagher & Burk, Inc. | - Regulation 6, Particulate Matter: Common Definitions and Test Methods; Rule 6-1: General Requirements; and Rule 6-6: Prohibition of Trackout (all regulating particulate matter)  
- Also see [Fugitive Dust White Paper](#) (first step in rule development process) |
| Backup Generators (BUGs) | - Various locations, including Amazon.com Services LLC warehouse | - Rule 2-5: New Source Review of Toxic Air Contaminants (regulating Toxics, including Diesel Exhaust Particulate Matter) |
| Landfills                | - Waste Management, Inc.                                                         | - Rule 8-34: Solid Waste Disposal Sites (regulating VOC and Methane)  
- Also see CARB Landfill Methane Rule |
| Cremation Services       | - East Bay Crematory  
- Evergreen Cemetery                                                                 | - Regulation 11 - Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities  
- See [Rule 11-18 Facility Risk Reduction Program](#) for updates to Implementation Procedures and for current facility lists, as well as the [Rule 11-18 Amendments Concept Paper](#) |
| Warehouses and Other Indirect Sources | - Amazon.com Services LLC warehouse | - See BAAQMD Stationary Source Committee Discussion of ISR + AB617 CERP strategies on Indirect/Magnet Sources  
- Including discussion of SCAQMD Warehouse Rule + approaches using Local Authority |
| Gasoline Dispensing      | - Various locations                                                              | - Rule 8-7: Gasoline Dispensing Facilities (regulating VOCs) |
Permitted Emissions Inventory: Relevant Strategies

Potential Air District Strategies
1. Enhance enforcement activities
2. Develop or amend rules and regulations
3. Strengthen permit conditions on new permit applications

<table>
<thead>
<tr>
<th>Potential Partner Agencies</th>
<th>Potential CERP Strategy Types</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Oakland (Planning, Department of Transportation, Public Works, Sustainability, City Administrator, Mayor’s Office, Police Department)</td>
<td></td>
</tr>
<tr>
<td>Alameda County Public Health Department</td>
<td>Better enforcement of existing rules</td>
</tr>
<tr>
<td>CalEPA</td>
<td></td>
</tr>
<tr>
<td>California Office of Environmental Health Hazard Assessment (OEHHA)</td>
<td>More holistic health, equity, and cumulative impacts analysis / assessments</td>
</tr>
<tr>
<td>Port of Oakland (airports)</td>
<td>Negotiation of community benefits agreements</td>
</tr>
<tr>
<td>Caltrans</td>
<td>Lobby state to add additional rules/protections</td>
</tr>
<tr>
<td>East Bay Municipal Utilities District (EBMUD)</td>
<td>Grant writing strategy for larger projects</td>
</tr>
<tr>
<td>PG&amp;E</td>
<td>Repair past harms that have created today’s inequities</td>
</tr>
<tr>
<td>East Bay Community Energy</td>
<td>Reduce exposure of the “sensitive receptors” (residents, vulnerable workers)</td>
</tr>
<tr>
<td></td>
<td>Enhance community collaborative problem solving and information sharing / data transparency</td>
</tr>
<tr>
<td></td>
<td>Updates to City Zoning code</td>
</tr>
<tr>
<td></td>
<td>Updates to City Conditions of Approval</td>
</tr>
<tr>
<td></td>
<td>Increase health-promoting conditions and programs</td>
</tr>
<tr>
<td></td>
<td>Multi-Agency coordination and data sharing</td>
</tr>
<tr>
<td></td>
<td>Indirect source rule</td>
</tr>
</tbody>
</table>
Appendix Slides: Auto Body Shop Example
### Air District Regulations that Apply to Auto Body Shops

<table>
<thead>
<tr>
<th>Rule 8-45</th>
<th>Motor Vehicle and Mobile Equipment Coating and Operations</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Rule 8-45 limits emissions of <strong>Volatile Organic Compounds (VOCs)</strong> from the finishing or refinishing of motor vehicles, mobile equipment and their parts and components</td>
<td></td>
</tr>
<tr>
<td>○ VOCs are released during the use, application, curing, or drying of solvents or surface coatings</td>
<td></td>
</tr>
<tr>
<td>● Rule Requirements, including:</td>
<td></td>
</tr>
<tr>
<td>○ Section 300 - Standards</td>
<td></td>
</tr>
<tr>
<td>■ Emissions limits</td>
<td></td>
</tr>
<tr>
<td>■ Equipment specifications</td>
<td></td>
</tr>
<tr>
<td>○ Section 400 - Administrative Requirements</td>
<td></td>
</tr>
<tr>
<td>■ Registration, Reporting, and Labeling</td>
<td></td>
</tr>
<tr>
<td>○ Section 500 - Monitoring and Records</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Rule 2-1 Section 412</th>
<th>General Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Rule 2-1 requires public notice before approving permits for new or modified emission sources near schools.</td>
<td></td>
</tr>
</tbody>
</table>
Engineering: Applying Regulations & Creating Permit Conditions for Auto Body Shops

 Permit Conditions will:

● **Prohibit** use of coatings containing cadmium or hexavalent chrome.
● **Require spray booths** to be fully enclosed and ventilated so that the air is drawn into the booth.
● **Require filter technology** on all spray booths to achieve 98% capture efficiency of airborne particles.

They protect health by prohibiting the use of certain toxic coatings and by requiring enclosures and high-efficiency filtration systems to minimize the release of harmful emissions.

 Actions the Air District can take:

● **Require changes** to the proposed project, which would be outlined in the permit conditions.
● **Failure to comply** with requirements would allow the District to deny the permit.

The community can receive information about permit actions through mailings when a public notice is triggered, via the website, and by making public records requests.
Compliance & Enforcement: Verifies that “AutoWizards” Meets Regulations and Permit Conditions.

<table>
<thead>
<tr>
<th>Demonstrate Compliance</th>
<th>Inspection</th>
<th>Results</th>
<th>Corrective Action</th>
<th>Legal Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilities must demonstrate compliance with all applicable Air District, State, and Federal regulations. This is verified through inspections.</td>
<td>Inspections are unscheduled and include a comprehensive review of sources of operations, emissions and control equipment, and records.</td>
<td>If a violation is discovered during the course of an inspection or investigation, a Notice of Violation (NOV) is issued to the facility.</td>
<td>Inspectors verify &amp; document that corrective actions bring facility into compliance with Air District rules. Staff may also work with partner agencies on enforcement cases.</td>
<td>Inspection report referred to Legal Division where it is resolved through the collection of civil penalties and/or other corrective actions, and, in serious cases, through the courts in either civil or criminal prosecution.</td>
</tr>
</tbody>
</table>
Appendix Slides: Strategy Examples from Path to Clean Air (Richmond-North Richmond-San Pablo) and West Oakland Community Action Plan related to Commercial & Industrial Sources

East Oakland AB 617 Community Steering Committee Meeting
June 13, 2024
PTCA Strategy 1 – Control Fugitive Dust

Strategy Objective ( Desired Outcome): Reduce fugitive dust exposure via more stringent regulatory requirements. By 2025, implement the most advanced best management practices for controlling fugitive dust at the project level.

### Action# C&I 1.1

The Air District will:

- Create a Dust White Paper, which includes identifying Best Management Practices, and evaluates Rule Development opportunities.
- Share it with the community for feedback.
- Implement the recommendations from the White Paper, including developing and adopting rule amendments, and implementing other identified recommendations.

### Action# C&I 1.2

The Air District will:

- Recommend local governments to add Best Management Practices (BMPs) for Fugitive Dust to conditions of approval for their projects, with an accessible list of BMPs online.

**Example:** BMP #4: All vehicle speeds on unpaved roads shall be limited to 15 mph.
PTCA Strategy 2. Utilize Permitting to Address Commercial and Industrial Sources Near Community

Strategy Objective ( Desired Outcome): Make permitting processes more accessible and understandable. Strengthen permitting processes by incorporating Environmental Justice (EJ) principles and stronger protections for communities

**Action# C&I 2.2**
The Air District, Engineering Division will:
- Keep working on protocols with enforcement, meteorology and measurements, and legal staff to make sure permit conditions are enforceable and emissions limits are consistently met.
- Collaborate with Community Engagement and District Counsel to create equitable protocols for handling requests to extend comment periods for permits.

**Action# C&I 2.4**
The Air District will evaluate permitting rules to identify opportunities for amendment. For example, by covering:
- **Rule 2-1 Improvements:** Improve Overburdened Community map and expand buffer zones to fix any inconsistencies.

Throughout this process, the Air District will work with the Community Steering Committee (CSC) and local communities to refine rule concepts.
PTCA Strategy 5. Commercial and Smaller Industrial Facilities

Strategy Objective (Desired Outcome): Address community concerns with respect to smaller facilities and sources (of a commercial or industrial nature). The objective is to reduce local and potential hyperlocal impacts from any of these sources.

**Action# C&I 5.1**
The Air District will run an assessment of Backup Generators (BUGs) through a white paper or rulemaking process, by:
- Reviewing BUGs, their usage, and impacts, including scrutinizing facilities with high BUG usage.
- Considering amendments to permitting rules for new or modified BUGs to strengthen emissions limits and regulate usage, especially near sensitive areas like schools.

**Action# C&I 5.2**
The Air District will:
- Run a source evaluation for Auto Body shops and produce a White Paper. This will start by the end of 2024 and align with West Oakland strategy #71, which targets autobody and other coating operations.
- Create an outreach tool, such as a flyer, to advocate for the public health advantages of water-based options, and consider a protocol for Compliance & Enforcement to distribute these materials during inspections.
Strategy #68

The Air District:
Proposes amendments to existing regulations to further reduce emissions from metal recycling and foundry operations, such as changes to:

- Rule 6-4: Metal Recycling and Shredding Operations, which requires metal recycling and shredding facilities to minimize fugitive PM emissions through the development and implementation of facility Emission Minimization Plans.
- Rule 12-13: Foundry and Forging Operations, which requires metal foundries and forges to minimize fugitive emissions of PM and odorous substances through the development and implementation of facility Emission Minimization Plans.

Strategy #24

The Air District:
- Works with agency and local partners to improve referral and follow-up on nuisance and odor complaints by 2021.
- This work includes updates to complaint processes, enforcement procedures, and coordination with other public agencies regarding odors, backyard burning, and other complaints.

Land Use Strategy Related to Stationary Sources

East Oakland AB 617 Community Steering Committee Meeting
June 13, 2024
WOCAP Stationary Source Strategies

Strategy #71:
The Air District:
- Proposes new regulations to reduce emission sources from autobody and other coating operations, including the use of vanishing oils and rust inhibitors by 2025.

Strategy #70:
The Air District:
- Intends to provide incentives to replace existing diesel stationary and standby engines (fire pumps, dryers, conveyor belts, cranes) with Tier 4 diesel or cleaner engines. Priority is given to upgrading Tier 0, 1 & 2 engines located closest to schools, senior citizen centers, childcare facilities, and hospitals.