

East Oakland Community Emission Reduction Plan (CERP)

Community Steering Committee Meeting #20

June 13, 2024

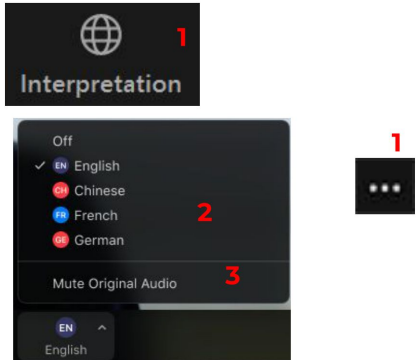


**BAY AREA AIR QUALITY
MANAGEMENT DISTRICT**

COMMUNITIES
FOR A BETTER
ENVIRONMENT
established 1978

Interpretation Instructions

Windows | macOS



ZOOM - Select Language Channel

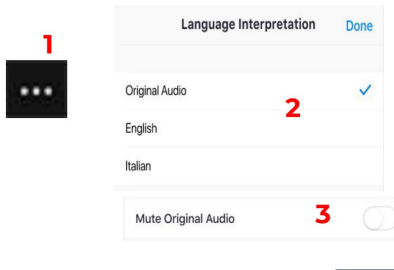
ENGLISH

1. In your meeting/webinar controls, click Interpretation.
2. Select the language that you would like to hear: English.
3. Closed caption: please turn on if you need it.

SPANISH

1. En los controles de la reunión o el seminario web, haga clic en Interpretación.
2. Haga clic en el idioma que desee escuchar: español (Spanish).
3. (Opcional) Para escuchar solo el idioma interpretado, haga clic en Silenciar audio original

Android | iOS



Welcome

Co-Chairs: Aiyahna 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

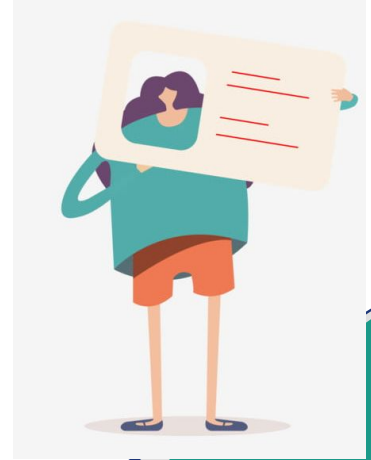
In person attendees are encouraged to interact with fellow participants during the dinner/meet and greet.

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.*



Where are We Today?

		2023				2024				2025				
Phase	Work Product	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
 SCOPE AND ORGANIZE PARTNERSHIP WITH COMMUNITY	Steering Committee (CSC)	»»»											»»»	
	CSC Governance	■	☑											
	Plan Vision & Principles	■	☑											
	Plan Community Boundary		■	☑										
 ASSESS THE CHALLENGES	Community Profile			■										
	Emissions Inventory			■										
	Health Inequities Information			■										
	Community Mapping Project			■										
	Compliance & Enforcement Data				■									
 PLAN OUR SOLUTIONS	Strategy Development		■											
	Plan Goals			■										
 PLAN REVIEW & ADOPT	Draft Plan								■					
	Environmental Assessment									■				
	Plan Adoption - CSC									■				
	Plan Adoption – BAAQMD										■			
	Plan Adoption – CARB											■		
 Implement	Plan Implementation												»»»	
	Track Progress													»»»
	Report on Progress													»»»

■ INTRODUCTION TO THE STEERING COMMITTEE ☑ DECISION MADE

Spotlight on Environmental Justice

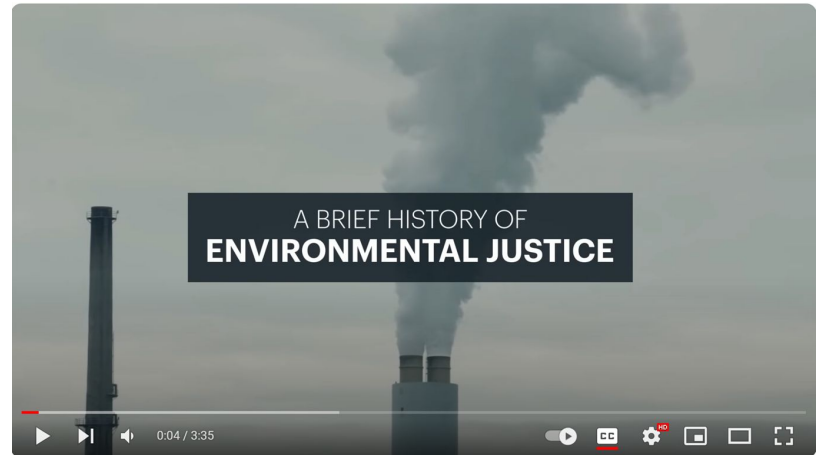
Aiyahna Johnson, Mr. Charles Reed, and Mykela Patton
CSC Co-Chairs

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 \(ejnet.org\)](https://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

Permitted Emissions Inventory Summary



East Oakland Emissions Inventory: A Closer Look at Permitted Sources (May 2024)



Introduction

To support the development of a community emissions reduction plan (CERP) for the East Oakland AB 617 community, the Bay Area Air Quality Management District (BAAQMD or Air District) worked with the California Air Resources Board (CARB) to develop an emissions inventory for local sources for the year 2021.¹ More recently, the Community Steering Committee (CSC), requested additional information about the largest pollution sources impacting East Oakland's air quality.

Pollution sources are classified into four source sectors: Permitted Stationary (point) source, Unpermitted Stationary (area) source, On-road Mobile, and Off-road Mobile (Table 1). This document takes a closer look at permitted sources in and near East Oakland² which are of special concern for a few reasons:

1. These facilities are directly regulated by the Air District (unlike mobile sources);

2. Permitted sources account for all or most emissions of some air toxics like mercury, dioxins and furans, and hydrogen sulfide; and
3. Individual facilities or groups of facilities may be located near sensitive populations such as schools or senior centers.

This document is organized into the following sections:

- > Introduction----- 1
- > Placing Permitted Sources in Context----- 3
- > Identifying East Oakland's Top Permitted Polluters --- 4
- > Identifying East Oakland's Top Permitted Processes - 7
- > Rules and Regulations Applicable to the Top Polluters and Processes ----- 10
- > Relevant Strategies----- 11

¹ The year 2021 was designated by CARB for baseline emissions inventory development based on the timing of East Oakland's selection for CERP development.

² Note that the East Oakland emissions inventory includes permitted sources within a geographic area that includes the community

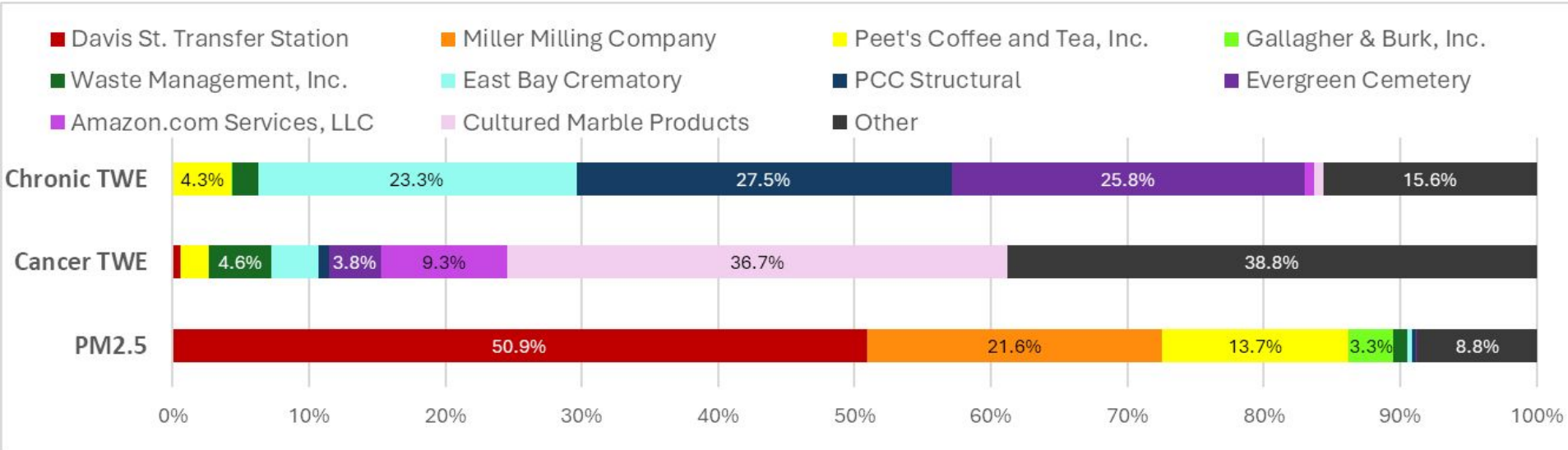
boundary established by the CSC and a buffer zone around the community that captures nearby sources that may impact air quality for community residents.

- 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

Pollutant Category	Description	Examples
Criteria Air Pollutants (CAPs)	Common air pollutants that harm human health. Regulated based on air quality standards that define “clean” air and “safe” levels of exposure.	Fine particulate matter (PM _{2.5}) Carbon monoxide (CO) Sulfur dioxide (SO ₂)
Toxic Air Contaminants (TACs)	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.	Diesel particulate matter (DPM), Benzene, Formaldehyde
Toxicity Weighted Emissions (TWE)	A metric that accounts for the relative toxicity of each individual TAC. Weights their emissions based on their potential health impacts (<i>ex: cancer, asthma, hypertension, eye or respiratory irritation, etc.</i>)	Cancer risk weighted Chronic hazard weighted Acute hazard weighted

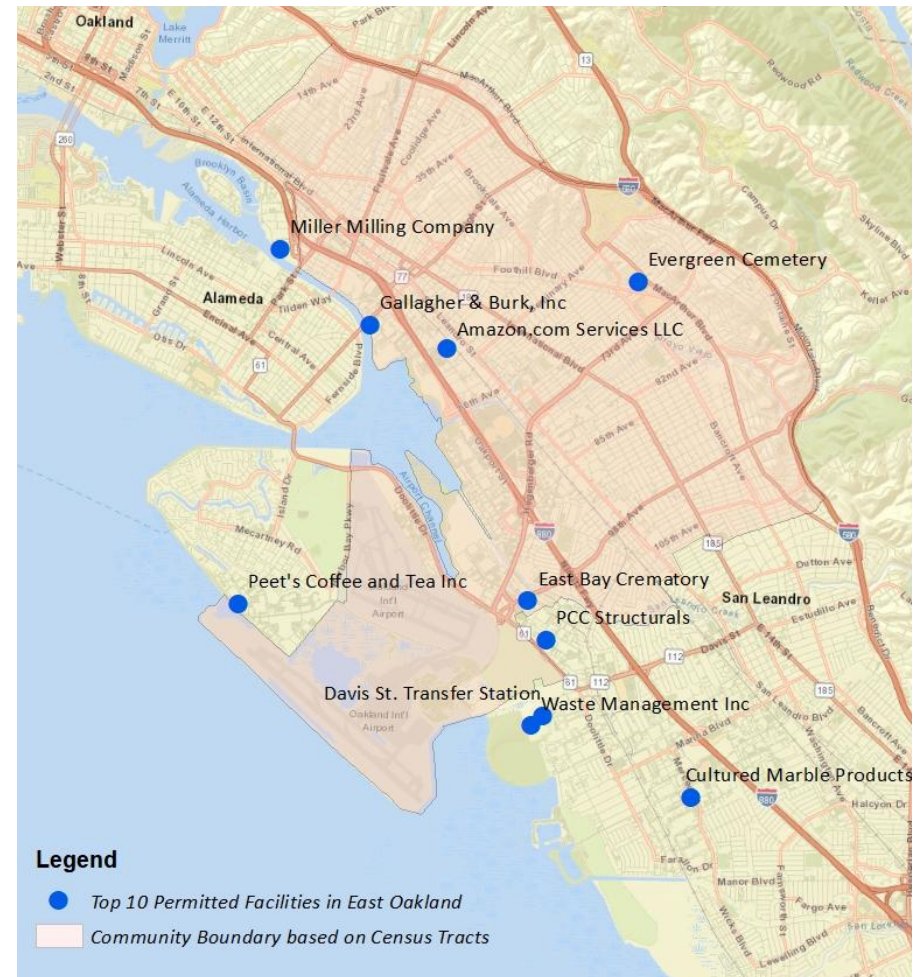
East Oakland's Top Permitted Polluters



- **PM_{2.5}**: Davis St. Transfer Station, Miller Milling Co., and Peet's Coffee and Tea
- **Cancer TWE**: Cultured Marble Products and Amazon Services, LLC
- **Chronic TWE**: PCC Structural and two crematories (Evergreen Cemetery and East Bay Crematory)

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



Communities for a Better Environment (CBE): Freedom To Breathe Campaign

How does CBE work on stationary source pollution?

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 Stonehearth 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.



Source: CBE Archive

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

CBE Advocacy on AB&I cont.

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



Source: CBE Archive (Photographer Joyce Xi)

CBE Advocacy on AB&I cont.

Rule 11-18

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



The header of the news release features the BAAQMD logo on the left, the text 'BAY AREA AIR QUALITY MANAGEMENT DISTRICT' in the center, and the 'COMMUNITIES FOR A BETTER ENVIRONMENT established 1978' logo on the right. A blue banner with 'NEWS RELEASE' in white text spans across the middle. Below the banner, the website 'baaqmd.gov' and social media icons for Facebook, Twitter, Instagram, and YouTube are displayed.

FOR IMMEDIATE RELEASE: September 5, 2023
CONTACT: communications@baaqmd.gov

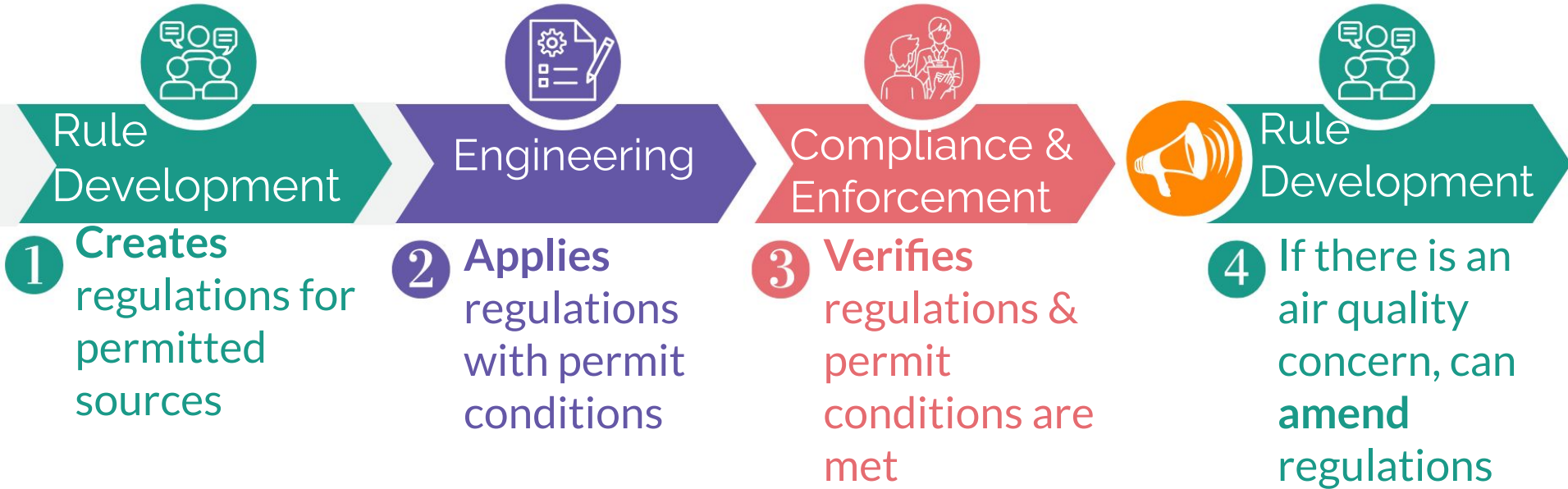
Air District and CBE partner to increase transparency and community participation in evaluating industrial health risk
New agreement to enhance Regulation 11-18 health risk assessment process

[BAAQMD press release](#)



Questions?

How does the Air District regulate permitted pollution sources? What actions can the Air District take?



Hypothetical Case: The Air District receives an application from an existing permitted source in East Oakland...



Example

“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.

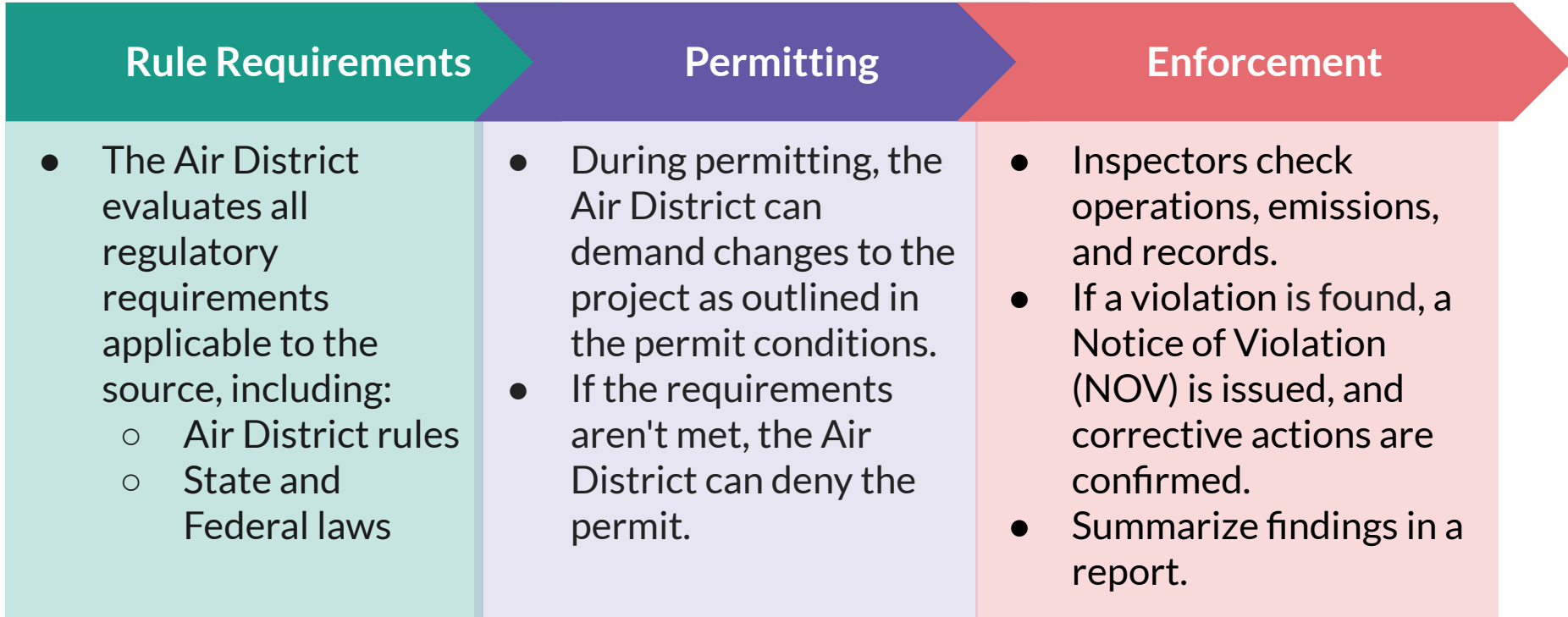


HEALTH IMPACTS

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?



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

Plan-level 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**



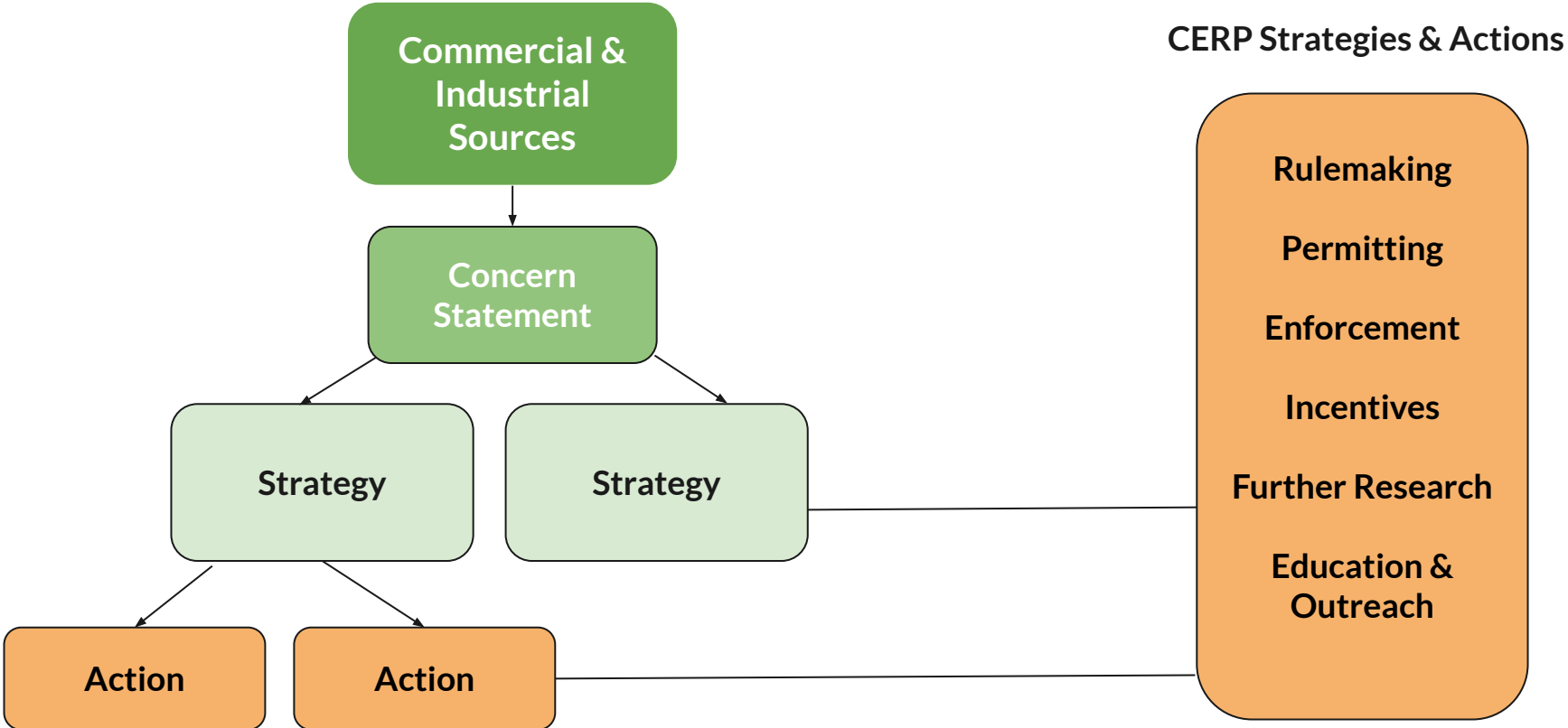
Source: Iliakalinin & Canva

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





Questions?

Argent Tour Discussion Report-Out

Carol Corr, Marina Muñoz, Gabrielle Sloane-Law



Questions?

Feedback on Meeting & Next Steps

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!



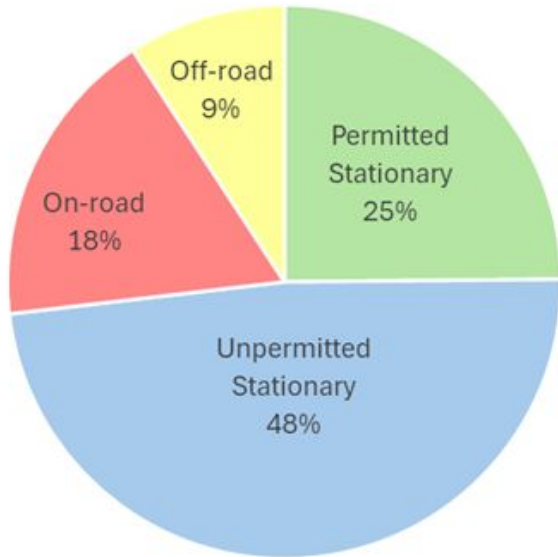
Appendix Slides: Permitted Emissions Inventory

Permitted Emissions Inventory: Categories of Sources

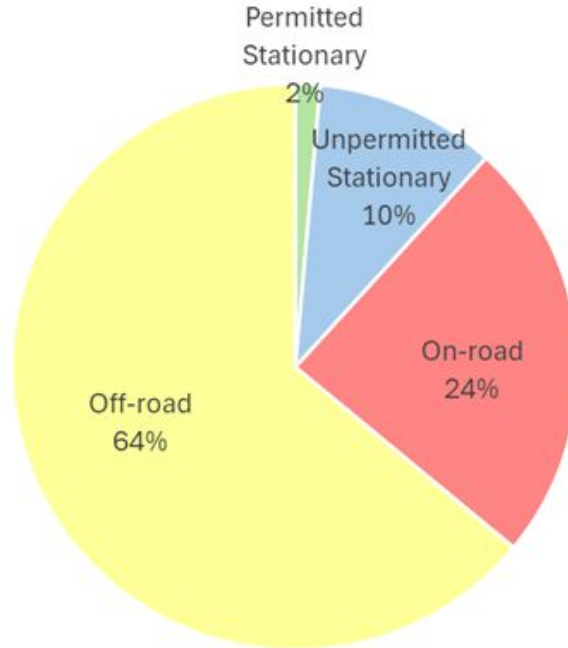
Source Sector	Description	Examples
Permitted Stationary	Stationary sources that are permitted by the Air District and treated as individual facilities in the inventory	Autobody shops; Crematories; Metal recycling businesses
Unpermitted Stationary	Stationary sources that are not permitted by the Air District and treated as a group in the inventory	Residential fireplaces; Commercial cooking; Construction dust
On-road Mobile	Mobile sources that operate on roadways	Buses; Passenger Cars; Trucks
Off-road Mobile	Mobile sources that do not operate on roadways	Aircraft; Locomotives; Ships

Permitted Emissions Inventory: Source sector contributions to PM2.5 emissions, cancer TWE and chronic TWE in East Oakland.

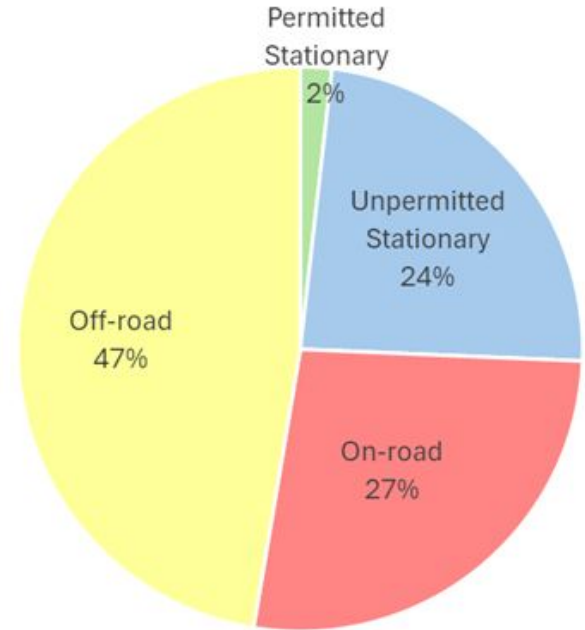
PM2.5 (tpy)



Cancer TWE



Chronic TWE



Permitted Emissions Inventory: Detailed information for the Top 10 permitted facilities in East Oakland (ranked in order of PM_{2.5} emissions).

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

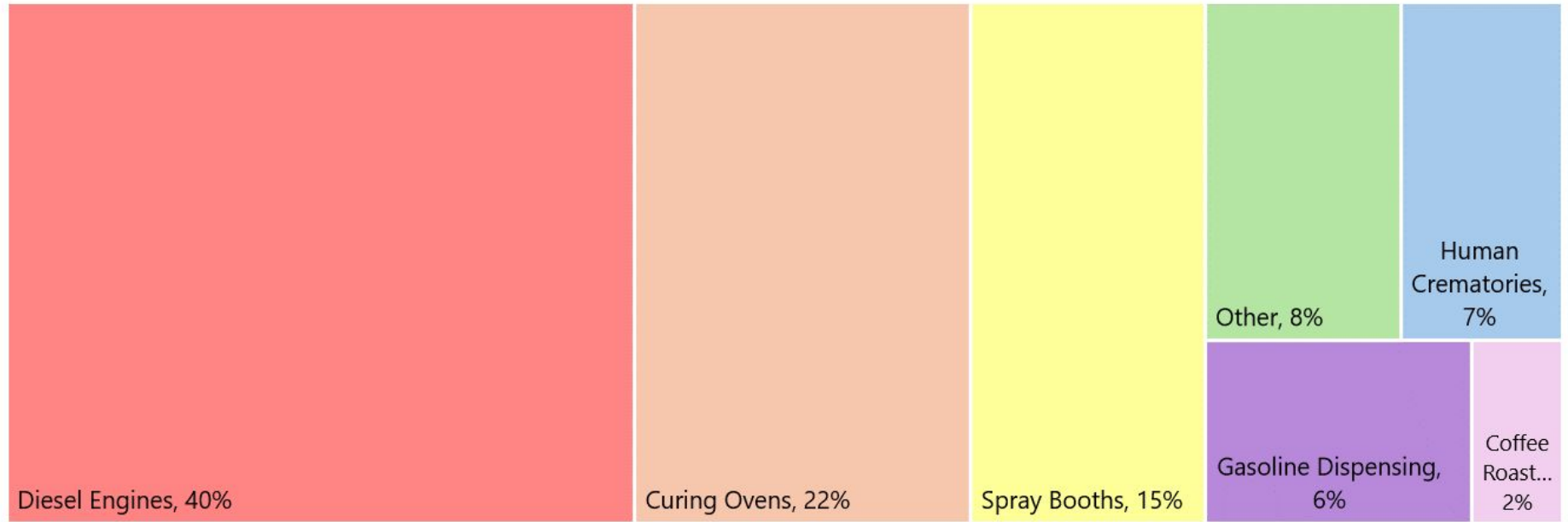
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Permitted Emissions Inventory: Sensitive Receptors

- 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.

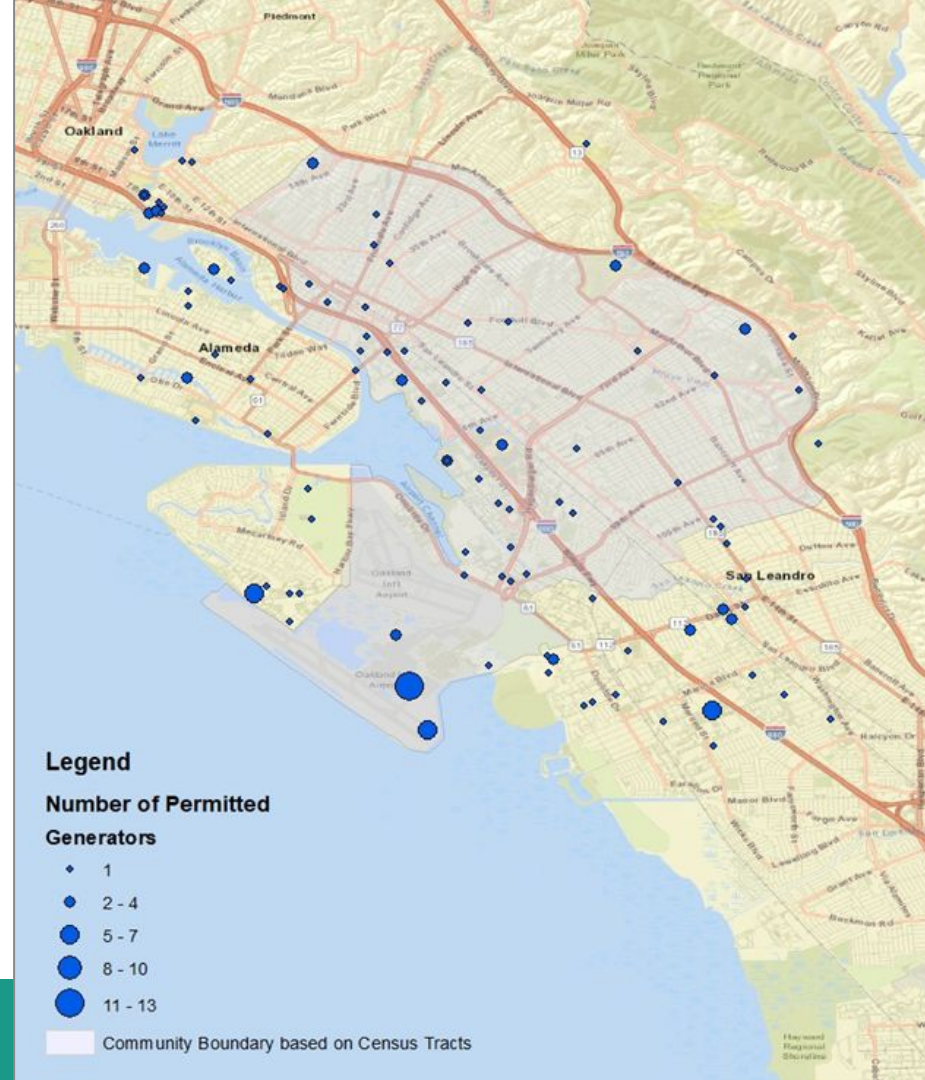
Permitted Emissions Inventory: Identifying East Oakland's Top Permitted Processes

Cancer TWE by Device Type for Permitted Sources Impacting East Oakland



Permitted Emissions Inventory: Permitted Diesel Generators

- Dot size shows the relative number of permitted diesel generators



Permitted Emissions Inventory: Example Permitted Source Regulations

Source/ Process Category	Facility Name(s)	Current Rules/Regulations
Permitted Sources (<i>in general</i>)	- 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 <u>Trackout</u> (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 o 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 o 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

Potential Partner Agencies

- City of Oakland (*Planning, Department of Transportation, Public Works, Sustainability, City Administrator, Mayor's Office, Police Department*)
- Alameda County Public Health Department
- CalEPA
- California Office of Environmental Health Hazard Assessment (OEHHA)
- Port of Oakland (airports)
- Caltrans
- East Bay Municipal Utilities District (EBMUD)
- PG&E
- East Bay Community Energy

Potential CERP Strategy Types

- Better enforcement of existing rules
- More holistic health, equity, and cumulative impacts analysis / assessments
- Negotiation of community benefits agreements
- Lobby state to add additional rules/protections
- Grant writing strategy for larger projects
- Repair past harms that have created today's inequities
- Reduce exposure of the "sensitive receptors" (residents, vulnerable workers)
- Enhance community collaborative problem solving and information sharing / data transparency
- Updates to City Zoning code
- Updates to City Conditions of Approval
- Increase health-promoting conditions and programs
- Multi-Agency coordination and data sharing
- Indirect source rule



Appendix Slides: Auto Body Shop Example

Air District Regulations that Apply to Auto Body Shops

Rule 8-45

Motor Vehicle and Mobile Equipment Coating and Operations

- Rule 8-45 limits emissions of **Volatile Organic Compounds (VOCs)** from the finishing or refinishing of motor vehicles, mobile equipment and their parts and components
 - VOCs are released during the use, application, curing, or drying of solvents or surface coatings
- Rule Requirements, including:
 - Section 300 - Standards
 - Emissions limits
 - Equipment specifications
 - Section 400 - Administrative Requirements
 - Registration, Reporting, and Labeling
 - Section 500 - Monitoring and Records

Rule 2-1 Section 412

General Permit Requirements

- Rule 2-1 requires public notice before approving permits for new or modified emission sources **near schools.**

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.

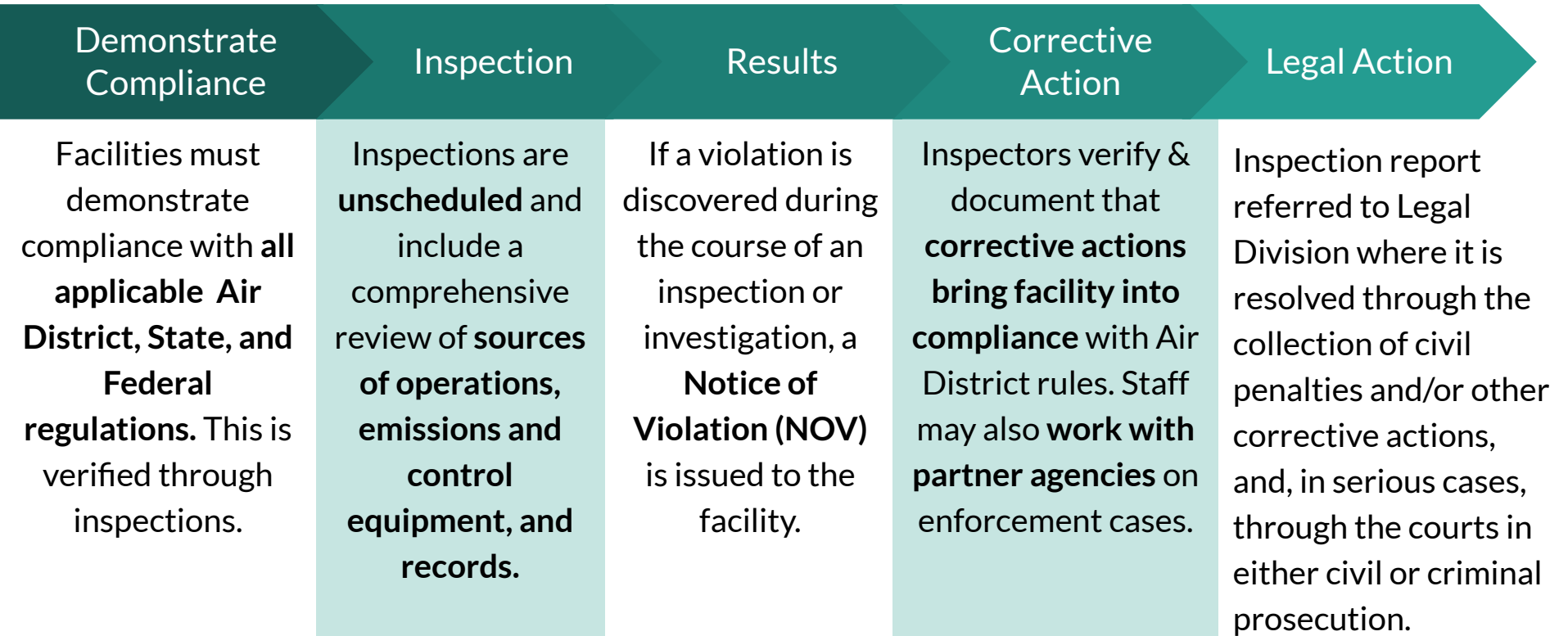
They protect health by prohibiting the use of certain toxic coatings and by requiring enclosures and high-efficiency filtration systems to minimize the release of harmful emissions.

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.





**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**

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.

WOCAP Stationary Source Strategies

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

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.