October 11, 2024

Wayne Nastri
South Coast Air Quality District
21865 Copley Drive
Diamond Bar, California 91765

Subject: Indirect Source Rule Concept Development

Dear Mr. Nastri:

Thank you for your comments at the October 4th Governing Board meeting. PMSA appreciates your invitation to all parties to work with you and South Coast Air Quality Management District (SCAQMD) Staff on the development of new concepts before language for a Port Indirect Source Rule (ISR) is developed. This letter is being sent to memorialize our enthusiastic acceptance of your offer and to appropriately convey that we look forward to scheduling public workshops to move this discussion forward.

As you are aware, there have been no workshops to discuss rule concepts since June 2023, when the concept of "hard emissions caps" was unveiled. At our request, technical workshops on the Port ISR were held in March of this year which focused on emission reduction technologies and tools, but not concepts or language. While those March 2024 workshops regarding tools and technologies were productive, insufficient time was made available to determine whether any of those tools and technologies would provide emissions reductions beyond those that will already occur as a result of the comprehensive framework that the California Air Resources Board has adopted for port-related sources.

Your statements on October 4th were well received. PMSA was also pleased to hear that there is no Port ISR language and that you are prepared to work with stakeholders on the development of concepts and language.

PMSA was deeply concerned that the SCAQMD would begin formal rulemaking this year. Understanding that SCAQMD staff will make time to work with us on meaningful concept development during informal rulemaking is appreciated.

PMSA looks forward to working with SCAQMD staff on scheduling a robust series of workshops on Port ISR concepts before moving any final resolution to the Governing Board for consideration.

Sincerely,

Thomas Jelenić
Vice President