

Ventura County APCD 2022-2023 AB 617 Annual Report

I. Report number, title, name of Grantee, date of submission, and grant number

Report Number: 1 (Final) (JM)
Name of Grantee: Ventura County Air Pollution Control District
Date of Submission: May, 2023
Grant Number: G21-CAPP-34

II. Costs Associated with Specific Tasks

See Attachment 1

III. How Grant Funding is Being Utilized to Meet the Goals of AB 617

Background:

During the first year of Assembly Bill 617 (AB 617) implementation, Ventura County Air Pollution Control (VCAPCD) did not possess adequate community level air monitoring data to make empirical assessments on burdened communities. Therefore, in developing our July 31, 2018 submittal to the California Air Resources Board (CARB), VCAPCD staff utilized:

- CalEnviroScreen 3.0
- U.S. Environmental Protection Agency (EPA) EJSCREEN mapping tool
- VCAPCD information on permitted facilities in and nearby disadvantaged/burdened communities identified via CalEnviroScreen 3.0 or EJSCREEN
- Community/public input

VCAPCD staff's areas of focus in using CalEnviroScreen 3.0 were air emission related information (ozone, PM 2.5, diesel particulate), traffic information, pesticide application information, and health factors (asthma, low birth weight and cardiovascular disease). The scores for pesticide application rates, asthma, cardiovascular disease, and diesel particulate are elevated in some census tracts in the Oxnard area. With regard to the elevated asthma scores, staff contacted Gold Coast Health Plan, the local Medi-Cal provider for Ventura County, and Ventura County Public Health. We requested information on the utilization of medical services related to asthma by Oxnard area residents as compared to residents in other areas of Ventura County. Ventura County Public Health responded with information showing elevated asthma rates in the 93030 ZIP code in Oxnard. The 93030 ZIP code matches reasonably well with the census tracts identified with elevated asthma rates in CalEnviroScreen 3.0.

The CalEnviroScreen 3.0 identifies the City of Oxnard as one of the impacted disadvantaged/ burdened areas. Staff conducted and participated in AB 617 public workshops in this area. During these meetings, the main comments received from the Oxnard community were related to emissions from heavy-duty trucks. This area does have food distribution facilities for onions, squid, and other commodities which would utilize heavy-duty trucks. In addition, truck traffic moving cargo from the Port of Hueneme passes through the Oxnard community.

VCAPCD staff's review of the U.S. EPA EJSCREEN mapping tool has determined that this tool does not provide much information beyond that provided by CalEnviroScreen 3.0. Staff also found that the EJSCREEN model is weighted heavily on demographic indicators. However, staff's initial review shows that the EJSCREEN environmental and demographic indicators seem reasonable.

On July 31, 2018, based on VCAPCD staff's review of the available data, staff recommended that the greater Oxnard/Port Hueneme area be the highest priority region in Ventura County for inclusion in CARB's Community Air Protection Program (CAPP). Staff's recommendation is based on our assessment that we have not identified a single or multiple sources of significant air emissions that would lead us to identify a smaller region adjacent to these source(s). This is in part based on our review of our permitted sources in the area.

The greater Oxnard/Port Hueneme area is also home to several agricultural operations, and these operations generally utilize pesticides and diesel equipment. In addition, the Port of Hueneme and several warehouse type distribution centers are located in the area. Heavy-duty trucks associated with these goods movement facilities move throughout the area.

In summary, we are looking at a diffuse inventory of air pollution sources in this area. This will likely require additional research including community level air monitoring in several locations to identify any sources of concern. In addition, by having a larger area, the VCAPCD will have flexibility to target our incentive funds within the area as we learn more about potential issues with air pollutant sources in and adjacent to the area.

VCAPCD staff defines the greater Oxnard/Port Hueneme area as the following census tracts (map attached).

- 6111002905 Oxnard (North West area)
- 6111003201 Oxnard (North area)
- 6111009100 Oxnard (Colonia area)
- 6111004902 Oxnard (North East area)
- 6111005002 Oxnard (Auto Center)
- 6111004704 Oxnard (South East area)
- 6111004715 Oxnard (South area)
- 6111004400 Port Hueneme

Staff reviewed information on other communities in Ventura County identified as potentially disadvantaged/burdened in CalEviroscreen 3.0. While staff is not recommending these areas as "first priority" for inclusion in CARB's program, we plan to work with these communities as we move forward implementing AB 617.

These other communities include the following census tracts:

- 6111002400 Ventura (Downtown area)
- 6111002300 Ventura (Avenue area near Hwy 33)
- 6111002200 Ventura (Avenue area East)
- 6111001302 Ventura (Saticoy)
- 6111006100 Newbury Park
- 6111000400 Santa Paula (North East area)*
- 6111000500 Santa Paula (South of Hwy 126)*
- 6111000302 Fillmore area*
- 6111000200 Piru area*
- 6111005002 El Rio area*

* Areas are included based on community/public input received at the April 9, 2018 local Community Environmental Justice workshop sponsored by the Central Coast Alliance United for a Sustainable Economy (CAUSE) and the California Environmental Justice Alliance. These areas were included in CalEnviroScreen 2.0 as potential disadvantaged/burdened communities.

VCAPCD Public Outreach/Coordination:

The VCAPCD partnered with the County of Ventura Executive Office, the County of Ventura Agricultural Commissioner's Office, Mixteco Indígena Community Organizing Project (MICOP), the Central Coast Alliance United for a Sustainable Economy (CAUSE) and Tracking California to develop a first-of-its-kind text alert system that will alert farmworkers when PM 2.5 due to wildfire smoke exceeds unhealthy AQI levels. The resulting Wildfire Smoke Text Alert System for Farmworkers was launched on July 21, 2021.

The original iteration provided text messages in Spanish and English and was designed to notify farmworkers and field supervisors when air quality exceeded one of two thresholds. When the AQI for PM 2.5 due to wildfire smoke could likely exceed 151, a text message would be sent to inform the recipient of the air quality value as well as their right to be supplied with an N95 respiratory mask by their employer. A second message would be sent if the AQI is a threat to exceed an AQI of 500 and states that fieldworkers are required to wear the N95 mask provided by their employer.

In response to requests from our partners at MICOP in August of 2022, the Wildfire Smoke Text Alert System was enhanced to provide direct communication to the many front-line farmworkers whose indigenous language has no text equivalent. First, the automatic response to the opt-in text now contains links to tutorial videos in Mixteco and Zapotec, as well as Spanish and English. Additionally, the structure of the alert was altered by updating each message to feature a warning icon specific to the AQI threshold value as well as a link to an audio version of the alert message in each language. Finally, in the event an alert is issued, a follow-up message will be sent to all subscribers to provide both audio and video instructions on how to download the CARB Smoke Spotter app to their smartphone which will provide near real time air quality values based on their location. As a result of this collective effort, the Wildfire Smoke Text Alert System now has over 500 subscribers, nearly 70% of whom opted to receive messages in Mixteco, Spanish and Zapotec.

Rollout of the enhanced version of the Wildfire Smoke Text Alert System for Farmworkers commenced with a feature article and remote interview with the Public Health Institute on September 26, 2022. (<https://www.phi.org/press/ventura-county-ca-launches-new-audio-alert-system-in-mixteco-and-zapoteco-to-protect-farmworkers-from-wildfires/>). A press conference was held at the MICOP headquarters on September 29, 2022; attendees included direct representatives for farmworkers, representatives from MICOP and CAL/OSHA, Radio Indígena 94.1 FM, and other local interest groups. A follow-up meeting was held with representatives from CAL/OSHA on November 17, 2022 to discuss and share resources that were utilized in the creation of the alert system.

Since the Wildfire Smoke Text Alert System for Farmworkers was launched, continued partnership with the Ventura County Farmworker Resource Program, MICOP, and other farmworker advocates and growers has helped raise awareness and increase farmworker participation in the text alert system. These collaborative partnerships will provide a variety of communications and outreach methods to support the health and safety of the farmworker community.

Staff has been collaborating with the local environmental organization Climate First: Replacing Oil and Gas (CFROG - formerly Citizens for Responsible Oil and Gas) on the implementation of AB 617. CFROG has been awarded a Community Air Grant by CARB. CFROG is tentatively planning to conduct

community air monitoring in the south Oxnard area and the Ventura Avenue area. Both of these areas are identified as areas VCAPCD is planning to target in implementing AB 617. CFROG is also planning on utilizing low-cost PM_{2.5} sensors, which could help identify areas with particulate matter concerns (especially if related to diesel combustion).

On September 14, 2018, VCAPCD staff met with CFROG representatives to kick-off our work on AB 617. VCAPCD staff agreed to participate on a Technical Advisory Committee for CFROG's community monitoring work. On October 17, 2018 VCAPCD staff met with a Civic-Spark fellow assisting CFROG in outreach for their community monitoring training for the low-cost PM_{2.5} sensors to be used by the public. On October 26, 2018, VCAPCD participated in the Technical Advisory Committee for the CFROG community monitoring program. The CFROG program includes: low-cost PM_{2.5} sensors for use by the public and drones carrying hydrocarbon sensors to obtain estimates of hydrocarbon concentrations near burning oil seeps. VCAPCD staff also participated in CFROG community meetings where the public was trained on the use of low-cost PM_{2.5} sensors on December 5, 2018, January 23, 2019, and January 30, 2019. As of the preparation of this report, no data has been provided to VCAPCD staff for review and comments, but the District continues to participate on the CFROG Technical Advisory Committee advising on how AB617 funds should be utilized in low-income and disadvantaged communities

The VCAPCD continues to collaborate with CFROG staff and staff from California State University Channel Islands University (CSUCI) on assessment of Aeroqual AQS1 low-to-mid cost community air monitoring instruments. On August 27, 2021 monitoring staff from VCAPCD met with CFROG and CSUCI staff at the VCAPCD monitoring station in Ojai – East Ojai Avenue for an initial instrument assessment and installation for an ozone comparison period. Three community air monitoring sensors will be compared and correlated to each other and collocated with a reference ozone monitor at the site. Instruments were assessed for basic functionality, flow rates, and settings configuration. The instruments were simultaneously exposed to known ozone concentrations with the VCAPCD reference calibration system. Collaboration and technical support on this monitoring effort is ongoing between VCAPCD, CFROG, and CSUCI.

Following the initial data quality assessment deployment of the Aeroqual AQS1 lower cost gas monitoring systems on Aug 27, 2021, VCAPCD worked with CFROG and CSUCI assessing collocated data and developing calibration procedures. The study included intra-sensor (AQS1 to AQS1) and collocation to Federal Equivalent Method (FEM)/Federal Reference Method (FRM) regulatory monitors at the VCAPCD air monitoring stations in Ojai (06-111-1004) and El Rio (06-111-3001), as well as calibration assessment at the VCAPCD office monitoring laboratory.

The lower cost sensor assessment study thus far has consisted of the following comparative phases and timelines.

- Phase 1: Three AQS1 monitors installed at the VCAPCD Ojai reference monitoring station for intra-sensor comparison and reference O₃ monitor comparison
– Sample period 8/28/2021 through 12/09/2021
- Phase 2: Four AQS1 monitors at VCAPCD lab for sensor calibration assessment
– Testing period 8/5/22 through 8/12/2022
- Phase 3: Four AQS1 monitors re-installed at Ojai station intra-sensor comparison and reference monitor O₃ comparison
– Sample period 8/13/2022 through October 2022

- 9/13/2022 through October 2022 one unit removed from Ojai and installed at VCAPCD El Rio
- Oxnard site for comparison to reference O3 and NO2 monitors.

Results from these comparative studies, best practices, difficulties and challenges were summarized and presented by VCAPCD monitoring staff to the project TAC on October 28, 2022.

In addition, VCAPCD contacted the Californians for Pesticide Reform organization, as it was also awarded a Community Air Grant and has noted it is looking at additional air monitoring for pesticides in the central coast region. VCAPCD staff is planning to coordinate with both CFROG and Californians for Pesticide Reform to ensure monitoring data has been subject to quality assurance and is understandable to the community.

Staff has also been involved with the Port of Hueneme/Oxnard Harbor District in development of the Port of Hueneme Reducing Emissions Supporting Health (PHRESH) Plan in greater Oxnard. The PHRESH plan is a comprehensive strategy to quantify and reduce criteria and greenhouse gas air emissions associated with activities at the port. It is intended to address multiple air quality regulatory requirements, including AB 617. As noted above, the greater Oxnard/Port Hueneme area is the highest priority region in Ventura County to be considered for inclusion in CARB's CAPP. The Port of Hueneme is a commercial deep-water port encompassing 120 acres with three different wharfs containing 6 berths for commercial shipping activity. The Port also leases two off-Port properties for cargo processing and there are several warehouse type distribution centers located in the area.

The Port of Hueneme has engaged in a cooperative relationship with VCAPCD to develop the PHRESH plan. The first meeting between Port of Hueneme and the district was in November 2017 to discuss the PHRESH concepts. One of the first steps in the PHRESH plan process was creating a comprehensive report identifying emission sources associated with the port and quantifying their emissions, including ocean-going vessels, harbor craft, cargo handling equipment, locomotives, wheeled vehicles including heavy-duty vehicles, auto and heavy equipment rolling stock and light duty vehicles (LDV) and Greenhouse Gas (GHG) emissions from stationary sources, including port employee commuting.

The VCAPCD partnered with the Oxnard Harbor District at the Port of Hueneme, CFROG, and CSUCI on a competitive grant application which was submitted to the EPA on 3/22/2022 by the Port of Hueneme. The title of the project is "Ventura County California Community Air Quality Monitoring Network" and is intended, if funded, to be a multi-year community air monitoring project focusing on underserved and economically disadvantaged communities surrounding the Port within the city of Oxnard. The project proposes source-specific stations to understand and communicate air pollution burden from freight and transportation networks in the Oxnard Plain of Ventura County, California, a major transportation corridor between Los Angeles and Central Coast of CA. The project will install four (4) air monitoring stations and develop a community-based team to create communication tools that facilitate understanding of the monitored air quality data, including a multilingual website to provide public access to the data. The project partners will implement a community focused program by engaging the local economically disadvantaged and underserved community impacted by the freight and transportation network, including establishing a Community Advisory Council and continuing to nurture a foundation of trusting relationships and inform the public and local community on local air quality.

To achieve our goal, we propose to use the Magee AE33 aethalometer to measure black carbon (BC) and brown Carbon (BrC). The BC measurement is attributed to incomplete combustion process and may be used as a surrogate for diesel particulate matter (DPM). Brown carbon is associated with wood and biomass burning and may be used to identify impacts from wildfire smoke. These measurements will be made within the Oxnard/Port Hueneme disadvantaged and underserved communities of Ventura County that are intersected by regional transportation corridors.

An Emissions Inventory Technical Working Group with representatives from the Port, their environmental consultants, VCAPCD, CARB, and EPA was convened in May 2019 to assess methods for estimating annual emissions for 2008, 2017 and 2018 from the variety of emission sources. The port has continued to update its emission inventory for the 2019 and 2020 inventory years, and has reviewed those inventories with VCAPCD staff.

Additional outreach activities are summarized below:

- VCAPCD staff participated in the Ventura County electric vehicle (EV) Ride and Drive Event on September 17, 2019, where staff interacted with approximately 100 people and often discussed incentives available to encourage EV adoption.
- VCAPCD staff attended a meeting with Californians for Pesticide Reform and the Ventura County Public Health Care Agency on July 24, 2019, including discussion of the “Drift Catcher” device intended to measure pesticide drift.
- Meeting with several school district representatives and an electric school bus manufacturer regarding incentives for electric school buses and infrastructure on July 18, 2019.
- VCAPCD Board of Directors meeting which included agenda items on Clean Air Day and incentive projects on September 9, 2019.
- VCAPCD set up an information booth at Ventura County’s Government Center on Clean Air Day, October 2, 2019, and interacted with dozens of people.
- VCAPCD staff’s outreach and community coordination effort on the Port of Hueneme’s PHRESH Plan included a meeting with Port staff in October 2019.
- VCAPCD Board of Directors meeting which included an agenda item on CAPP incentive projects on January 14, 2020.
- VCAPCD Board of Directors meeting which included a status report on the District’s air quality incentive programs including Carl Moyer, CAPP and FARMER on February 11, 2020
- In February 2020, Port of Hueneme and VCAPCD staff met to discuss strategies for public outreach, including establishing a working group of community members, local industry, environmental groups and the district, similar to other CAPP working groups that have been created throughout the state.
- VCAPCD Board of Directors meeting which included agenda items on incentive projects and a resolution supporting increased funding for the FARMER Program on March 10, 2020
- Participated at a CAPCOA Board meeting to coordinate allocation of AB617 implementation funds among local districts on March 17, 2020.
- Participated at CFROG Technical Advisory Committee meeting regarding the use of air sensor data for National Ambient Air Quality Standard (NAAQS) compliance and some of the limitations associated with the low-cost sensors.
- VCAPCD staff sent an email soliciting input on VCAPCD’s Year 2 proposed CAP Incentive Program projects to approximately 25 people on VCAPCD’s Community Air Protections Program Mailing List on April 22, 2020.
- VCAPCD Board of Directors meeting which included an agenda item on CAPP incentive projects on May 12, 2020.
- VCAPCD Board of Directors meeting which included agenda items on budget, including CAPP and FARMER incentive programs, on June 9, 2020.
- VCAPCD Board of Directors meeting which included an agenda item on status of CAPP on July 14, 2020.
- October 1, 2020, EV incentives and funding “lunch and learn” webinar where VCAPCD staff gave presentation about available EV incentives, including CAP incentive program, as part of National Drive Electric Week.

- VCAPCD Board of Directors meeting which included agenda items on incentive projects on November 10, 2020
- Email request for input on proposed CAPP incentive projects distributed to 25 individuals and community organizations on the VCAPCD CAPP distribution list on November 12, 2020.
- VCAPCD web site was updated with the list of all applications received for CAPP, FARMER, and Carl Moyer incentives on November 24, 2020.
- VCAPCD Board of Directors meeting which included an agenda item on CAPP and FARMER incentive projects on December 8, 2020
- VCAPCD staff gave a presentation to the Ventura County Agricultural Policy Advisory Committee virtual meeting on CAPP, FARMER, and Carl Moyer incentives on December 9, 2020.
- VCAPCD Board of Directors meeting which included an agenda item introducing the VCAPCD functions and programs to new Directors, including CAPP and CAPP incentives, on January 12, 2021.
- VCAPCD Board of Directors meeting which included an agenda item on status of VCAPCD incentive programs, including CAPP incentives, FARMER, and Carl Moyer, on March 9, 2021.
- Email announcement of request for applications for VCAPCD incentive programs, including CAPP, FARMER, and Carl Moyer, sent to 178 individuals and organizations on the VCAPCD incentive program distribution list on March 25, 2021.
- Participated at a CAPCOA Medium Districts and CAPCOA Board meeting on AB617 implementation funds allocations coordination held on March 15 and March 17, 2021.
- Participated and provided a presentation on AB617 Program and implementation at South Central Coast Basin wide Air Pollution Control Council meeting held on March 25, 2021.
- Participated at Port of Hueneme's public workshops held on Port of Hueneme's Strategic Plan and Infrastructure Initiatives, held on April 7 and 8, 2021.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on May 11, 2021.
- VCAPCD Board of Directors meeting which included a public hearing on the District budget, including incentives, on June 8, 2021.
- VCAPCD Board of Directors meeting which included a public hearing on the District budget, including incentives, on June 22, 2021.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on July 13, 2021.
- CALeVIP South Central Coast Project requirements webinar to assist interested applicants for the CALeVIP program, scheduled to launch the following month, including answering questions from interested parties about how the incentive program would operate in Ventura County, including interaction with other incentives, held on July 15, 2021.
- Roundtable Discussion: The Nexus of Air Quality and Agriculture hosted by VCAPCD on August 8, 2021, discussion included incentives to reduce air emissions from agriculture.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on September 14, 2021.
- National Drive Electric Week outreach event in Oxnard on September 26, 2021, where VCAPCD shared a booth with SBCAPCD to share information about EV cars and incentives available to residents of low-income and disadvantaged communities, encouraging the public to transition to battery electric transportation – at the event there were over 2 dozen different EVs, a local dealership offering test rides, and other stakeholders with similar goals to increase EV utilization.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on October 12, 2021.
- VCAPCD Board of Directors meeting which included an agenda item on CARB's proposed

Commercial Harbor Craft Regulation which included discussions of incentive funding for regulated businesses held on November 9, 2021.

- VCAPCD Board of Directors meeting which included an agenda item on CARB's proposed Commercial Harbor Craft Regulation which included discussions of incentive funding for regulated businesses held on December 8, 2021.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on December 14, 2021.
- VCAPCD Board of Directors meeting which included agenda items on incentive program issues held on February 8, 2022.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on March 8, 2022.
- VCAPCD web site was updated with the list of all applications received in 2021 for CAPP, FARMER and Carl Moyer incentives and all proposed projects for each incentive program on March 28, 2022.
- Email request for input on proposed CAPP incentive projects distributed to 26 individuals and community organizations on the VCAPCD CAPP distribution list on March 30, 2022
- Email announcement of request for applications for VCAPCD incentive programs, including CAPP, FARMER, and Carl Moyer, sent to 203 individuals and organizations on the VCAPCD incentive program distribution list on March 31, 2022.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on April 12, 2022.

BARCT Review for Rules in Disadvantaged Communities:

VCAPCD staff prepared a draft BARCT rule development schedule to comply with this statutory requirement of AB 617 and conducted a public workshop on October 30, 2018. CARB had identified four facilities in Ventura County that are subject to AB 617 BARCT requirements; the facilities are operated by Procter and Gamble, New Indy Container, California Resources (Santa Clara Valley Gas Plant), and Trinity ESC. District staff then evaluated which District rules are applicable to these facilities that may not meet BARCT requirements, including Rule 74.23, Stationary Gas Turbines; Rule 74.15, Boilers, Steam Generators and Process Heaters; Rule 71.3, Transfer of Reactive Organic Compound Liquids; and Rule 74.10, Components at Crude Oil and Natural Gas Production and Processing Facilities.

In addition, VCAPCD staff is proposing the development of a new rule to regulate the ozone precursor emissions from oilfield flares to address emissions from a nonemergency flare at the Santa Clara Valley Gas Plant. Staff is proposing to use BARCT benchmark rules mainly from the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the South Coast Air Quality Management District (SCAQMD) to determine the feasibility of adopting more stringent regulations. If adopted, these new BARCT requirements may impact any applicable emission source above and beyond the four AB 617 sources due to the District's need to adopt BARCT or "all feasible measures" as a nonattainment area for ozone under the California Clean Air Act.

On December 11, 2018, the AB 617 expedited BARCT Rulemaking Schedule was approved by the Ventura County Air Pollution Control Board (Board) as shown in the table below. Under AB 617, BARCT is to be fully implemented on all affected sources no later than December 31, 2023.

Rule Number	Rule Title	Actual or Anticipated Adoption Date	BARCT Benchmark(s)	Affected Source Type
74.23	Stationary Gas Turbines	11/12/2019	SJVAPCD* Rule 4703	Natural gas turbines
74.15	Boilers, Steam Generators and Process Heaters	11/10/2020	SJVAPCD Rule 4320	Boilers, steam generators and process heaters
71.3	Transfer of Reactive Organic Compound Liquids	05/11/2021	SJVAPCD Rule 4624	Crude oil loading racks
New Rule	Flares	08/01/2023	SJVAPCD Rule 4311	Flares
74.10	Components at Crude Oil and Natural Gas Production and Processing Facilities	10/01/2023	SJVAPCD Rule 4409 and SCAQMD† Rule 1173	Oilfield fugitive emissions from leaking components

* San Joaquin Valley Air Pollution Control District

† South Coast Air Quality Management District

A detailed summary of the status of staff's work on the above rules subject to expedited BARCT schedule is provided below:

In 2019, staff reviewed the cost effectiveness (CE) methodology and threshold to determine effectiveness of implementing BARCT rule amendments. When comparing different methodologies, it was discovered that the Discounted Cash Flow (DCF) method was only used by SCAQMD, while all other Districts in California used the Levelized Cash Flow (LCF) method. Staff determined that continuing to use the LCF resulted in the easiest comparison between VCAPCD and other Districts. Staff proposed adjustments to BACT CE levels to be comparable with neighboring Districts at \$30,000 per ton for both ROC and NOx. Staff also proposed creating a new CE threshold for BARCT rule amendments at \$39,000 per ton of NOx reduction. The VCAPCD Board adopted both thresholds on November 12, 2019.

Rule 74.23, Stationary Gas Turbines: VCAPCD has adopted the BARCT limits recently proposed by South Coast Air Quality Management District (SCAQMD) Rule 1134, which are 2.5 ppmv of Nitrogen Oxides (NOx) and 10 ppmv of ammonia (NH3). A public workshop was scheduled for July 25, 2019 and presented the proposed emissions limits for Stationary Gas Turbines, which would require three turbines in the County to either be retrofitted or replaced. Estimated emissions reductions were about 107 tons of NOx per year. The VCAPCD Board adopted Rule 74.23 amendments on November 12, 2019.

Rule 74.15, Boilers, Steam Generators, and Process Heaters: VCAPCD staff evaluated BARCT emission standards implemented by San Joaquin Valley Air Pollution Control District (SVAPCD) Rule 4320 for larger boilers, steam generators and process heaters. The VCAPCB adopted Rule 74.15 amendments on November 11, 2020. Utilizing the current Board-approved cost-effectiveness (CE) methodology, and 2019 Board approved CE threshold for BARCT (\$39,000/ton of NOx), 27 of the 99 boilers subject to 74.15 in Ventura County will be required to meet BARCT emission limits. Many will not be required to retrofit due to low use, or due to the existing permitted emission limits that would comply with BARCT limits. An estimated 48 units are anticipated to limit their annual throughput to be exempt from the

proposed BARCT limits.

Rule 71.3, Transfer of Reactive Organic Compound Liquids: VCAPCD staff evaluated SJVAPCD Rule 4624 emission limits to reduce Reactive Organic Compounds (ROC) emissions from crude oil loading racks by increasing the destruction efficiency requirements of vapor collection systems. The VCAPCD adopted Rule 71 and Rule 71.3 amendments on May 11, 2021, which required greater vapor control from loading racks and lowered the leak threshold from 10,000 ppmv to 1,000 ppmv ROG. No retrofits are anticipated, due to existing equipment already complying with the new standards.

New Rule for Oilfield Flares: VCAPCD staff has evaluated SCAQMD Rule 1118.1 to develop a new rule regulating emissions from flares. A public workshop was held on May 18, 2022, with an anticipated second workshop at a date yet to be determined. VCAPCD staff conducted a site visit to review flare operations and limitations on March 15, 2023. The new rule is expected to be adopted in summer of 2023.

Rule 74.10, Components at Crude Oil and Natural Gas Production and Processing Facilities: VCAPCD staff has been evaluating SJVAPCD Rule 4409 and SCAQMD Rule 1173 to reduce ROC emissions from oilfield components such as valves, flanges, compressors, pumps, etc. Staff anticipates rule adoption in fall 2023.

VCAPCD Emission Inventory and Reporting Programs

The AB 617 CAPP has annual criteria and toxic pollutant emissions reporting requirements that will apply to permitted stationary sources. CARB has developed a statewide regulation for emissions reporting for this purpose, the “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (CTR). The CTR was originally adopted by CARB in December 2018 and became effective on January 1, 2020.

On November 19, 2020, CARB adopted amendments to the CTR and to the Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines (EICG) Regulation. However, based on public comment received, the Board directed CARB staff to consider additional modifications to the regulations prior to finalizing the revisions. As such, CARB proposed 15-Day Changes for CTR & “Hot Spots” EICG Regulation. The proposed changes raise the criteria pollutant threshold for facilities in Ventura County (Group B air districts) from 4 tons per year (tpy) to 10 tpy (CTR), withdraw proposed 4 tpy threshold from EICG, revise thresholds for composting and material handling facilities, delay the reporting requirement by one year (from 2023 to 2024), exclude reporting of prescribed burning and permitted open burning, and so forth. These modifications were adopted by CARB on October 28, 2021 and are effective January 1, 2022.

CTR emissions reporting applicability currently is based on three criteria: (1) facilities that are subject to the statewide Greenhouse Gas Mandatory Reporting Rule; (2) facilities with permitted emissions \geq 250 tons/year of nonattainment/precursor pollutants; and (3) “high priority” facilities with certain levels of toxic emissions or health risks. The first year of emissions reporting will begin with 2019 calendar year data reported in 2020 for 12 facilities, identified by CARB, in Ventura County. Those facilities also reported 2021 emissions in 2022.

The CTR will greatly expand emissions reporting applicability to a large number of additional small emission sources encompassing the vast majority of permitted facilities statewide. The CTR and EICG regulations will greatly increase the number of facilities subject to new criteria pollutant emissions reporting applicability thresholds (4.0 tons/year except CO at 100 tons/year for large districts & 10 tons/year for small and medium districts) and require emissions reporting from a wide array of small facilities emitting toxic air contaminants having activity levels over specific thresholds for 52 sectors of

facilities. Emissions reporting for the additional applicability facilities will begin with 2024 emission data reported in 2025. This expansion of the CTR will have a significant impact on the emission inventory workload at the VCAPCD.

There have been a series of Workgroup conference calls beginning in December 2017 and several in person meetings with CARB staff at the District for this purpose. VCAPCD staff has attended multiple CTR implementation workshops since early 2018 with the most recent one on February 11, 2021 and has provided extensive comments on the details of the applicability and implementation of several iterations of the proposed CTR to both the CAPCOA Workgroup and CARB. We have also performed extensive analysis of our existing emission inventory and provided information to CARB in response to several data requests.

During the third year of AB 617 implementation, VCAPCD Planning, Rules and Incentives Division staff reviewed CARB's proposed 15-Day Changes for CTR & "Hot Spots" EICG Regulation and provided comments to CAPCOA and CARB. Staff has also participated in several CTR and EICG working group meetings and workshops.

The CTR will require considerable improvements in our criteria and toxic pollutant emissions inventory with respect to data quality and level of detail reported. Work on these improvements already has begun. A substantial amount of effort in particular has gone into development of the toxics emissions inventory for AB 617 CTR Regulation emissions reporting. The toxics emissions inventory also will be utilized for the requirements of the AB 2588 Toxics Hot Spots program.

Beginning in September 2019, preliminary toxic air contaminant (TAC) emission factors were developed and sent for review to facilities subject to CTR emissions reporting for inventory years 2019 and 2020, and to potential AB 2588 high priority risk facilities. An extensive review period with the facilities followed, with some facilities providing their own alternative TAC emission factors. There were in-person meetings with several facilities to discuss TAC emission factors that will be used for CTR reporting and AB 2588. In May 2020, we began integrating the established TAC emission factors into the criteria emissions inventory for AB 617 CTR emissions reporting in August from 2020 to 2022. The District emission inventory for 2020 included TAC emission data for 80 facilities, and the 2021 inventory included 88 facilities with TAC emission data.

The District reviewed point source emission data for facilities located in or near potential environmental justice communities as identified by the District using CalEnviroScreen.

In addition to emission inventory reporting, AB 617 has rule development requirements to implement BARCT. This has necessitated an assessment of emissions that could be subject to revised district rules to implement BARCT for turbines, boilers, loading racks, flares and other emission sources.

VCAPCD Incentive Programs Targeting Priority Populations:

From the AB 617 perspective, the primary objective of the VCAPCD's Incentive Programs, which include the Carl Moyer, FARMER, and Community Air Protection (CAP) incentive programs, is to achieve emission reductions of diesel particulate. As noted above, the Oxnard region scored poorly with respect to asthma rates in CalEnviroScreen 3.0 and this finding corresponded with information obtained from the Ventura County Public Health Department. The CalEnviroScreen 3.0 Report notes a link between diesel particulate and the exacerbation of asthma symptoms in asthmatic children.

On December 11, 2018, the Board approved \$1,192,602 in funding from the FARMER Program for projects in Ventura County. The funding was allocated as follows:

- 73 percent for projects in communities classified as both disadvantaged and low-income, and
- 27 percent for projects in low-income communities.

These projects achieve emission reductions of 17.5 tons per year of ozone precursors and 1.1 tons per year of diesel particulate matter.

Also, on December 11, 2018, the Board approved \$624,050 in funding from the CAP Incentive Program for emission reduction projects. The funding was allocated as follows:

- 94 percent for projects in communities classified as both disadvantaged and low-income, and
- 6 percent for a project in a disadvantaged community.

These projects achieve emission reductions of 4.9 tons per year of ozone precursors and 0.3 tons per year of diesel particulate matter.

On June 11, 2019, VCAPCD staff conducted a public workshop to solicit input for the upcoming cycle of our Carl Moyer, FARMER, and CAP incentive programs. The evening workshop was conducted at the Oxnard Public Library. Approximately 15 people attended the meeting, including members of CFROG, CAUSE, and staff from the Port of Hueneme. The community's primary concern was diesel trucks in their neighborhoods. The concern is consistent with VCAPCD's approach to focus on projects that reduce diesel particulate matter within these communities. During the public workshop, VCAPCD announced that it would be soliciting advanced technology projects that would reduce diesel particulate matter, ozone precursors, and greenhouse gases. Community representatives attending the workshop supported VCAPCD's focus on reducing diesel particulate matter emissions.

On November 11, 2019, the Board approved \$1,119,772 in FARMER Program funds to projects located in Ventura County. The funding was allocated as follows:

- 62 percent for projects in communities classified as both disadvantaged and low-income,
- 35 percent for projects in low-income communities, and
- 3 percent for projects in disadvantaged (but not low-income) communities.

These projects achieve emission reductions of 12.1 tons per year of ozone precursors, 0.9 tons per year of diesel particulate matter, and a total greenhouse gas reduction of 135 metric tons of carbon dioxide equivalent (MTCO₂e).

In March 2020, VCAPCD published a list of CAP Incentive Program Year 2 proposed projects on the VCAPCD website. On April 22, 2020, VCAPCD sent an email soliciting input on VCAPCD's Year 2 proposed CAP Incentive Program projects to approximately 25 people on the VCAPCD's CAP Mailing List. VCAPCD received no response or input on the proposed projects. On May 12, 2020, the Board approved \$1,752,100 in CAP Incentive Program funds to assist three school districts replace four diesel school buses with zero-emission buses and install the associated electric vehicle charging infrastructure. The three school districts that received funding all serve priority populations, and the funding was allocated as follows:

- 73 percent for projects in communities classified as both disadvantaged and low-income, and
- 27 percent for projects in low-income communities.

These projects achieve emission reductions of 0.8 tons per year of ozone precursors, 0.01 tons per year of

diesel particulate matter, and a total greenhouse gas reduction of 83.4 MTCO₂e.

On December 8, 2020, the Board approved \$427,559 in FARMER Program funds to projects located in Ventura County. The funding was allocated as follows:

- 82 percent for projects in communities classified as both disadvantaged and low-income, and
- 18 percent for projects in low-income communities.

These projects achieve emission reductions of 4.8 tons per year of ozone precursors, 0.3 tons per year of diesel particulate matter, and a total greenhouse gas reduction of 11.2 metric tons of carbon dioxide equivalent (MTCO₂e).

In November 2020, VCAPCD published a list of CAP Incentive Program Year 3 proposed projects on the VCAPCD website. On November 12, 2020, VCAPCD sent an email soliciting input on VCAPCD's Year 3 proposed CAP Incentive Program projects to approximately 25 people on VCAPCD's CAP Mailing List. VCAPCD received no response or input on the proposed projects. On December 8, 2020, the Board approved \$1,211,402.91 in CAP Incentive Funds.

A portion of the December 8, 2020, CAP funds assisted two school districts with replacing two diesel school buses with zero-emission buses and installing the associated electric vehicle charging infrastructure. The December 8, 2020, CAP funds also assisted with replacement of 10 higher emission diesel agricultural equipment with new, lower-emission diesel agricultural equipment. All projects that received funding benefited priority populations with 100 percent of the funding allocated to projects in communities classified as both disadvantaged and low-income. These projects achieve emission reductions of 5.05 tons per year of ozone precursors, 0.38 tons per year of diesel particulate matter, and a total greenhouse gas reduction of 52.14 MTCO₂e.

On March 8, 2022, the Board approved \$2,827,886 in Carl Moyer Program funds to projects located in Ventura County. The funding was allocated as follows:

- 32 percent for projects in communities classified as low-income, and
- 68 percent for projects in communities not considered priority populations.

These projects achieve emission reductions of 23.5 tons per year of ozone precursors, 1.97 tons per year of diesel particulate matter, and a total of greenhouse gas reduction of 214 metric tons of carbon dioxide equivalent (MTCO₂e). The grant funding awarded on March 8, 2022, funded replacement of 50 pieces of higher emission diesel agricultural equipment with new, lower-emission diesel agricultural equipment.

On April 12, 2022, the Board approved \$1,899,797 in FARMER Program funds and \$442,898 in CAP Program funds to projects located in Ventura County. The funding was allocated as follows:

- 66 percent for projects in communities classified as both disadvantaged and low-income,
- 7 percent for projects in communities classified as disadvantaged, and
- 26 percent for projects in communities classified as low-income.

These projects achieve emission reductions of 25 tons per year of ozone precursors, 1.72 tons per year of diesel particulate matter, and a total greenhouse gas reduction of 272 metric tons of carbon dioxide equivalent (MTCO₂e). The grant funding awarded on April 12, 2022, funded replacement of 49 pieces of higher emission diesel agricultural equipment with new, lower-emission diesel agricultural equipment and 1 diesel UTV with a battery-electric UTV.

IV. Summary of Work Completed Since the Last Progress Report

VCAPCD Public Outreach/Coordination:

The following list of public outreach events and meetings and hearings included discussion of the CAPP including community engagement and/or CAP Incentive Programs. Note that public engagement was disrupted by the COVID-19 pandemic with restrictions placed on in-person interactions.

- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on April 12, 2022.
- As part of the National Drive Electric week, the VCAPCD participated in the Ventura Harbor EV Showcase on September 25, 2022, Ride and Drive event at the Ventura Government Center on September 27, 2022, and Oxnard Farmer's Market EV Showcase on September 29, 2022. VCAPCD showcased the VCAPCD's Chevy Bolt electric car with the goal of promoting low/no emission equipment. In addition, VCAPCD staffed booths at each event to inform the community of incentive funding opportunities, VCAPCD operations and goals; solicit community input on air quality priorities; and encourage community involvement.
- On October 5, 2022, the District participated in the Fifth Annual California Clean Air Day through a hybrid in-person display at the Government Center and through online participation via the California Clean Air Day website. The Government Center display highlighted the emission reductions achieved in Ventura County through the District's various incentive programs. The online outreach event encouraged County residents to take the California Clean Air pledge by committing to perform at least one "clean the air" activity listed on the California Clean Air Day website.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on October 11, 2022.
- On October 12, 2022, the VCAPCD participated in the Gold Coast Transit Clean Air Summit. The Air Pollution Control Officer gave a presentation to the summit on VCAPCD operations including CAPP activities and incentives. VCAPCD staff operated a booth informing the public of incentive programs available to promote low/no emission equipment, VCAPCD operations and goals, solicit community input on air quality priorities, and encourage community involvement.
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on March 14, 2023.
- Call for Year 2023 VCAPCD incentive program applications, including CAP, FARMER, and Carl Moyer programs, emailed to 239 individuals and organizations on the VCAPCD incentive program distribution list on April 7, 2023
- VCAPCD Board of Directors meeting which included agenda items on incentive program awards held on April 11, 2023.

BARCT Rule Implementation in Disadvantaged Communities:

On February 18, 2021, VCAPCD staff conducted a workshop for amendments to Rule 71.3, Transfer of Reactive Organic Compound Liquids. The proposed amendments require more effective vapor control and implements comments from industry to result in the greatest amount of emission reductions from this source category, while remaining cost-effective. Amendments to Rule 71.3 are anticipated to reduce ROC emissions from this source category by 0.8 tons of ROC per year. The VCAPCB approved the adoption of these BARCT amendments to Rule 71.3 on May 11, 2021.

On December 20, 2021, Procter and Gamble submit an Authority to Construct application to upgrade an LM-2500 stationary gas turbine. This retrofit will implement BARCT, as amended in Rule 74.23 on November 12, 2019, by the implementation deadline of December 31, 2023. This will reduce NOx emissions by 74.72 tons per year and these emission reductions will benefit the adjacent DAC in South Oxnard. This facility originally agreed to provide \$6.8 million to be used on emission reduction projects in the neighboring community in lieu of retrofit, in accordance with California Health and Safety Code § 40920.6.

On May 18, 2021, VCAPCD conducted a workshop for implementing BARCT standards to new Rule 74.35, Flares. The proposed new rule proposes to limit flaring and reduce emissions from existing flares, with the goal of increasing beneficial use of fuel gas. New Rule 74.35 will implement the maximum emission reductions for this source category.

VCAPCD Emission Inventory and Reporting Programs:

The following is a list of activities and accomplishments pertaining to the VCAPCD Emission Inventory and Reporting Programs from July 2022 through present.

- Reviewed CARB's proposed amendments to the Criteria and Toxics Emissions Reporting Regulation (CTR) expanding emission reporting requirements and provided comments to CAPCOA and CARB
- Reported emissions for facilities subject to CTR as part of annual point source emission inventory
- Reported TAC emission data for 88 facilities
- Participated in a CARB workshop for the proposed amendments to the CTR and Emission Inventory Criteria Guidelines Regulation (EICG) in February 2021
- Participated in a CARB workshop for the proposed amendments to the CTR and Emission Inventory Criteria Guidelines Regulation (EICG) in September 2021
- Developed preliminary Toxic Air Contaminant (TAC) emission factors and sent them for review to facilities subject to CTR emissions reporting for inventory years 2020-2022 and to potential AB2588 high priority risk facilities
- Met with facilities to discuss TAC emission factors to be used for CTR reporting and AB2588
- Revised TAC emission factors in consultation with facilities
- Integrating TAC emission factors and emissions into the criteria emissions inventory for AB 617 CTR emissions reporting submitted beginning in 2020
- Met with Port of Hueneme representatives to discuss their Port of Hueneme Reducing Emissions Supporting Health (PHRESH) Plan to quantify and reduce criteria and greenhouse gas air emissions associated with activities at the port in July 2021
- Participated in Emissions Inventory Technical Working Group for Port Hueneme's Inventory of Air Emissions for Calendar Years 2019 and 2020 report
- Reviewed the draft Inventory of Air Emissions for Calendar Years 2019 and 2020 report from Port of Hueneme
- All comments received on the draft report were addressed by Starcrest Consulting, and the Inventory of Air Emissions for Calendar Years 2019 and 2020 report

VCAPCD Incentive Programs Targeting Priority Populations:

On October 12, 2022, the Board approved \$567,705 in Carl Moyer Program funds for marine vessel engine repower projects and \$400,000 in Carl Moyer Program funds to a non-agricultural off-road project, all located in Ventura County. Marine vessels operating along the Ventura County coastline emit diesel particulate matter that affects all communities in Ventura County, including low-income and disadvantaged communities.

These projects will achieve emission reductions of 8.9 tons per year of ozone precursors, 0.4 tons per year of diesel particulate matter, and a total of greenhouse gas reduction of 60.2 metric tons of carbon dioxide equivalent (MTCO₂e). The grant funding awarded on October 12, 2022, funded replacement of 7 pieces of higher emission diesel engines with newer, lower-emission diesel engines.

On March 14, 2023, the Board approved \$4,072,108 in Carl Moyer Program funds to projects located in Ventura County. The funding was allocated as follows:

- 9 percent for projects in communities classified as both disadvantaged and low-income,
- 1 percent for a project in a community classified as disadvantaged,
- 46 percent for projects in communities classified as low-income, and
- 44 percent for projects in communities not considered priority populations.

These projects will achieve emission reductions of 35.17 tons per year of ozone precursors, 2.7 tons per year of diesel particulate matter, and a total of greenhouse gas reduction of 1,024.6 metric tons of carbon dioxide equivalent (MTCO₂e). The grant funding awarded on March 14, 2023, funded replacement of 68 pieces of higher emission diesel agricultural equipment with new, lower-emission diesel agricultural equipment.

On April 11, 2023, the Board approved \$148,277 in FARMER Program funds and \$345,111 in CAP Program funds to projects located in Ventura County. The funding was allocated 100 percent for projects in communities classified as both disadvantaged and low-income. These projects will achieve emission reductions of 2.94 tons per year of ozone precursors, 0.30 tons per year of diesel particulate matter, and a total greenhouse gas reduction of 38.54 metric tons of carbon dioxide equivalent (MTCO₂e). The grant funding awarded on April 11, 2023, funded replacement of 8 pieces of higher emission diesel agricultural equipment with new, lower-emission diesel agricultural equipment.

V. Grant Funds Remaining and Expended

See Attachment 2

VI. Expenditure Summary - Community Air Protection Implementation Funds

See Attachment 3

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II. COSTS ASSOCIATED WITH SPECIFIC TASKS
VENTURA COUNTY AIR POLLUTION CONTROL
AB617 COMMUNITY AIR PROTECTION PROGRAM - IMPLEMENTATION

SUMMARY OF COSTS - August 1, 2022 to March 31, 2023										
Program Component	Need	Air Pollution Control Officer	Monitoring Manager	Supv. AQ Specialist	AQ Specialist	Fiscal Officer	Fiscal Technician	Offic Assistant	Exceedance over grant amt	Total
	Costs	\$ 7,773.27	\$ 4,729.79	\$ 947.44	\$ 93,228.55	\$ 1,237.34	\$ 1,548.64	\$ 1,121.64	\$(16,626.67)	\$ 93,960.00
	Hours reported	62.00	63.50	12.00	1,265.00	16.00	37.00	30.00		1,485.50
Community Monitoring	Staff to maintain equipment, assess and analyze data, and to conduct short-term monitoring studies.		63.50							63.50
	Additional permanent, regulatory-quality, air quality monitoring equipment for tracking long-term progress.									-
	New equipment for mobile monitoring and other short-term monitoring studies.									-
	New software for data management, assessment and visualization.									-
Community Emissions Reduction Plans	Coordination of the AB 617 development process.									-
	New software for project tracking.									-
Community Engagement	Working with communities to prepare them for the AB 617 process.			12.00						12.00
	Grants to local communities for their participation and engagement.									-
Review of Best Available Retrofit Control Technology	Review existing controls for sources that contribute to emissions at facilities subject to Cap-and-Trade.	62.00								62.00
	Develop and conduct CEQA review on schedule to implement new control requirements.									-
Emissions Reporting Coordination	Develop new, statewide emissions calculations protocols.				1,265.00					1,265.00
	Software enhancements to improve quality of reported data.									-
Overhead	Executive time to coordinate/oversee program development.									-
	Legal services for CEQA analysis and regulatory development.									-
	Administrative overhead for new staff and contracts.					16.00	37.00	30.00		83.00
Total		62.00	63.50	12.00	1,265.00	16.00	37.00	30.00		1,485.50

v. Grant Funds remaining and expended

Grant Amount	\$93,960.00
Disbursement Request, March 31, 2023 (8/1/22-3/31/23)	<u>(93,960.00)</u>
Remaining balance	0.00

vi. Expenditure summary showing all Community Air Protection Program Implementation Funds for which reimbursement is being requested

AB 617 COMMUNITY AIR PROTECTION PROGRAM						
SUMMARY OF EXPENDITURES - LABOR AND OTHER COSTS						
PERIOD COVERED: 8/1/22 - 3/31/23						
		FY23				
		Salary Rates	Labor			
		by Classification	Hours	Salary Costs	Fringe	Total
AIR POLLUTION CONTROL OFFICER	GHASEMI	96.44	62.0	5,979.44	1,793.83	7,773.27
MONITORING MANAGER	MICHIE	57.30	63.5	3,638.31	1,091.48	4,729.79
SUPERVISING AQ SPECIALIST	HENKELMAN	60.73	12.0	728.80	218.64	947.44
AQ SPECIALIST II	AUNG	56.69	1,265.0	71,714.27	21,514.28	93,228.55
FISCAL OFFICER	MACARAEG	59.49	16.0	951.81	285.53	1,237.34
FISCAL TECHNICIAN	MACIAS	32.20	37.0	1,191.26	357.38	1,548.64
OFFICE ASSISTANT	MAFFEI	28.76	30.0	862.80	258.84	1,121.64
Total AB 617 Expenditures			1,485.50	85,066.69	25,519.99 25,519.98 (JM)	110,586.67
Less expenditures over the grant amount						(16,626.67)
Total AB 617 Expenditures 8/1/22-3/31/23						93,960.00
<i>Note: Disbursement Request submitted 4/17/23.</i>						