

## LAX GSE Emissions Reduction Policy

### I. Definitions

ATCM refers to the California Air Resources Board's Portable Equipment Registration Program (PERP) and associated Portable Diesel Engine Airborne Toxic Control Measures. More information on ATCM can be found at <http://www.arb.ca.gov/toxics/atcm/atcm.htm>.

CARB refers to the California Air Resources Board.

Grams per brake horsepower-hour or g/bhp-hr is a measurement of the grams of pollutant emitted by an engine of a specific horsepower rating over a one hour period.

GSE "Ground Support Equipment" is any vehicle or equipment used to support aircraft operations that is subject to, or included in compliance plans to meet, the requirements of the CARB In-Use Off-Road Diesel (ORD) Vehicle Regulation Program, CARB Off-Road Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation Program, or CARB Portable Equipment Registration Program and associated Portable Diesel Engine Airborne Toxic Control Measure (ATCM). At LAX, LAWA, airlines and other entities own and operate GSE to support arriving, departing, and parked aircraft.

LAWA refers to Los Angeles World Airports.

LAX refers to the Los Angeles International Airport.

LAX GSE Fleet is comprised solely of GSE operated at LAX.

Low-Use GSE which may be excluded from the GSE fleet average emission calculation, shall be determined based on the rules set forth in the applicable CARB program, i.e., ORD, LSI, ATCM. Rules governing Low-Use GSE under these programs can be found at <http://www.arb.ca.gov>.

LSI refers to the CARB Off-Road Large Spark-Ignition Engine Fleet Requirements Regulation Program. More information on LSI can be found at <http://www.arb.ca.gov/msprog/offroad/orspark/orspark.htm>.

Operator or GSE Operator shall mean any Airport Contractor, Airport Lessee, or Airport Licensee that operates GSE at LAX.

ORD refers to the CARB In-Use Off-Road Diesel Vehicle Regulation Program. More information on ORD can be found at <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>

Small Equipment is a category of GSE, which covers equipment with internal combustion engines of less than 25 horsepower (excluding electric-powered GSE). Such equipment include portable generators, power-washers, landscaping equipment, small compressors, and the like.

## **1. GSE Emissions Reduction Policy**

### **a. Policy**

LAWA established a GSE Emissions Reduction Policy to reduce the airport-wide fleet average composite GSE emission factor at LAX to equal to, or less than, 2.65 grams per horsepower-hour of hydrocarbons plus nitrogen oxides (g/bhp-hr of HC plus NOx) by December 31, 2021 (the “2021 LAX GSE Emissions Goal”). The final GSE Emissions Reduction Policy (the “Policy”), which was adopted by BOAC on April 16, 2015 and became effective July 1, 2015, is available at the following link: <http://www.lawa.org/gse>.

### **b. 2021 LAX GSE Fleet Operator Emissions Target**

Each GSE Operator will be required to achieve a composite emissions factor equal to or less than 2.65 g/bhp-hr of HC plus NOx for its LAX GSE Fleet by December 31, 2021 (the “2021 LAX GSE Fleet Operator Emissions Target”). Upon achieving the 2021 LAX GSE Fleet Operator Emissions Target, each GSE Operator shall be required to ensure that its fleet average composite emissions factor does not thereafter exceed the target. In the event that an annual emissions target is not achieved by a fleet owner, LAWA will adopt CARB alternative compliance strategies when evaluating a GSE Operator’s status and efforts towards achieving the 2021 LAX GSE Fleet Operator Emissions Target.

## **2. Reporting**

To monitor and support ongoing progress toward meeting the 2021 LAX GSE Fleet Operator Emissions Target each GSE Operator will provide to LAWA the following reports as described in the Policy.

### **a. Annual Reports**

Each Operator is required to submit annual reports to LAWA documenting the composition of its GSE Fleet at LAX, validating its composite emissions factor, and attesting to the accuracy of the information provided. Beginning in 2016, the Annual Report shall be due on or before January 22<sup>nd</sup> of each year for the prior year, or upon request from a GSE Fleet Operator, LAWA may grant an extension no later than February 15<sup>th</sup> of each year for the prior year. The annual report shall include:

- a calculation of the average composite emissions factor for HC plus NOx for its LAX GSE fleet. Low-Use GSE may be excluded from the Operator’s GSE fleet



average composite emission factor calculation. The criteria defining Low-Use GSE is based on the applicable CARB program, ORD, LSI, or ATCM. Rules governing Low-Use GSE under these programs can be found at <http://www.arb.ca.gov>. Each Operator's composite emissions factor must be calculated using the composite emissions factor calculator approved by LAWA, which can be found at <http://www.lawa.org/gse>.

- an inventory of the Operator's LAX GSE Fleet. Low-Use GSE as defined by the applicable CARB program, ORD, LSI, or ATCM, must be included in the annual inventory. Each Operator's annual inventory must include data for each piece of equipment and must be submitted in the format approved by LAWA, which can be found at <http://www.lawa.org/gse> and
- a written statement attesting to the accuracy of the information provided. The form for the written statement is similar to the Responsible Official Affirmation of Reporting (ROAR) form used by CARB and is available at <http://www.lawa.org/gse>.

LAWA reserves the right to change or amend the format of the annual report and the composite emissions calculator from time to time. The basic nature and overall format of the data submittal will be similar to and/or compatible with the recordkeeping and reporting requirements for compliance with CARB statewide regulations (the ORD, LSI, and ATCM programs), to the extent practicable.

The annual report must be submitted, in electronic format by email, to [gsereporting@lawa.org](mailto:gsereporting@lawa.org).

b. 2019 Interim Assessment Report and Action Plan

i. Interim Assessment Report

No later than March 31, 2019, each GSE Operator will provide LAWA with an interim assessment report providing the average composite emissions factor for its LAX GSE fleet as of March 1, 2019. Low-Use GSE may be excluded from the Operator's GSE fleet average composite emission factor calculation for the 2019 Interim Assessment. The criteria defining Low-Use GSE is based on the applicable CARB program, ORD, LSI, or ATCM. Rules governing Low-Use GSE under these programs can be found at <http://www.arb.ca.gov>. Each GSE Operator will be required to calculate the composite emissions factor for its LAX fleet using the composite emissions factor calculator approved by LAWA, which can be found at <http://www.lawa.org/gse>.

ii. Action Plan

If the average composite emissions factor of a GSE Operator's LAX GSE fleet exceeds 3.0 g/bhp-hr as of March 1, 2019, the GSE Operator shall provide to LAWA an action plan for reducing the average composite emissions factor of its LAX GSE Fleet to be equal to or less than 2.65 g/bhp-hr of HC plus NOx by December 31, 2021, no later than July 1, 2019.

The Action Plan must be submitted, in electronic format by email, to [gsereporting@lawa.org](mailto:gsereporting@lawa.org).

At a minimum, the Action Plan must include:

- The composite emissions factor for the Operator's GSE Fleet operating at LAX as of March 1, 2019. The composite emissions factor for each piece of equipment must be calculated using the composite emissions factor calculator approved by LAWA, which can be found at <http://www.lawa.org/gse>.
- A detailed list of each piece of GSE operating at LAX for GSE 25hp or greater, including any electric-powered GSE of any horsepower rating: ID Number, GSE Category, Manufacturer, Model Year, Fuel Type, Fueling Method, Power (bhp), Odometer/Hour Meter Reading. LAWA has developed an electronic spreadsheet in Microsoft Excel that must be used to submit the requested information. The spreadsheet can be found at <http://www.lawa.org/gse>.
- The emissions factor for each piece of equipment for GSE 25hp or greater, including any electric-powered GSE. The emissions factor for each piece of equipment must be calculated using the composite emissions factor calculator approved by LAWA, which can be found at <http://www.lawa.org/gse>.
- The Operator's detailed plan for reaching 2.65 g/bhp-hr by December 31, 2021, showing which pieces of equipment will be retired or replaced, and the date of such retirement or replacement. In addition, for each piece of new equipment, the Action Plan must show the anticipated emissions factor, manufacturer, model year (if known), fuel type, fueling method, power, and date of replacement.

### **3. Requirements for New Operators**

A GSE Operator who plans to begin operations at LAX after the effective date of this policy (i.e., July 1, 2015), but prior to December 1, 2018, will be required to comply with the reporting requirements of this policy as set forth in Section 3. as of the next reporting due date. For example, a new Operator who plans to begin operations at LAX on August 31, 2017, would be required to submit its inventory, emissions calculation, and attestation to LAWA no later than January 22, 2018.

A GSE Operator who plans to begin operations at LAX on or after December 1, 2018, will be required to submit an inventory of its planned GSE Fleet, a calculation of its composite emissions factor, and a written statement attesting to the accuracy of the information provided to LAWA as set forth in Section 3.a. at least 30 days prior to commencement of operations at LAX. If the new Operator's composite emissions factor is greater than 3.0 g/bhp-hr of HC plus NO<sub>x</sub>, the new Operator will be required to submit an Action Plan that complies with the requirements set forth in Section 3.b.ii. before the new Operator will be allowed to commence operations at LAX.

#### **4. Confidentiality of GSE Reporting Data**

An LAX GSE Operator providing information pursuant to this Policy may designate information regarding fleet composition, vehicle or fleet age, fleet size and confidential data used to determine estimated cost of complying with the policy, as “trade secret” information (“Trade Secret Designated Information” or “TSDI”). Trade Secret designations must be made in writing and specifically identify the information to be treated as such and the contact information to be used in case of a CPRA request. LAWA will not disclose TSDI to the public, except (a) with the written consent of the fleet owner or other responsible official, (b) pursuant to the California Public Records Act (“CPRA”), or (c) as otherwise required or allowed by law. If LAWA receives a CPRA request for the release of TSDI, LAWA will promptly contact the LAX GSE Operator who marked the information TSDI using the contact information provided with the TSDI designation. LAWA will release all information pursuant to the CPRA request within the required period of time if there is no court order prohibiting the release.

LAWA may also release all information received (including information designated as trade secret) to the California Air Resources Board, the Federal Environmental Protection Agency, and other public agencies including, but not limited to, law enforcement and public health agencies that have similar protections in place for trade secret information.

Information that will not be considered trade secret and therefor may be made publicly available includes (but is not limited to) a GSE Fleet Average Composite Emissions Factor that LAWA has determined has been calculated in compliance with this Policy and the make and model of a vehicle based on its Equipment Identification Number.