



July 14, 2026

South Coast Air Quality Management District
Attn: Mike Morris
Planning and Rules Manager
21865 Copley Drive
Diamond Bar, CA 91765

Subject: Essential Public Services and Critical Reliability Concerns Regarding Proposed Rule 1110.4

Dear Mike,

On behalf of Clean Water SoCal, we appreciate the meeting with you and your team to provide feedback regarding **Proposed Rule 1110.4 (PR 1110.4)**. While we support the District's ongoing efforts to evaluate Best Available Retrofit Control Technology (BARCT) and lower regional emissions, we urge the District to carefully evaluate the unintended, regulatory and public health consequences of restricting the use of emergency diesel generators at essential public service facilities—specifically, water and wastewater treatment plants.

Clean Water SoCal represents over 80 public water/wastewater agencies in Southern California. Clean Water SoCal members provide essential water supply, wastewater treatment and water disinfection for approximately 20 million people in San Diego, Orange, Los Angeles, Santa Barbara, Riverside, San Bernardino, and Ventura counties. Our members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

As currently conceptualized, any technology-forcing requirements under PR 1110.4 that push facilities away from on-site emergency diesel generators toward alternative technologies, such as natural gas-fired engines, introduce potentially catastrophic vulnerabilities to water and wastewater infrastructure. As illustrated in the attached summary, which includes a natural gas supply interruption during the 1994 Northridge Earthquake, natural gas pipelines are subject to supply outages, volumetric restrictions, fire related shutdowns, and seismic vulnerabilities during regional disasters—the exact moments when our infrastructure must rely on 100 percent dependable back-up power 24 hours per day, seven days per week (24/7).



Forcing a shift to less reliable emergency power sources will directly impair our members' ability to maintain mandatory compliance with overlapping state and federal mandates, exposing the region to severe public health risks and environmental degradation.

1. Inflexible Federal and State Mandates for 24/7 Operations

Unlike standard commercial facilities, water and wastewater treatment plants are classified as Essential Public Services¹ and must operate continuously under strict regulatory frameworks. Requiring the use of less reliable emergency power conflicts with the following statutes:

- **The Federal Clean Water Act (CWA):** Pursuant to [National Pollutant Discharge Elimination System \(NPDES\) permits](#), wastewater treatment plants are legally mandated to achieve specific effluent limitations at all times. A power interruption of even a few minutes can disrupt biological treatment processes or disinfection, leading to the discharge of partially treated or raw sewage into public waterways.
- **The California [Porter-Cologne Water Quality Control Act](#):** Codified in the California Water Code, this law holds our agency and designated operators strictly liable for any unpermitted waste discharges.
- **[California Water Code Section 13263](#) & Regional WDRs:** The Regional Water Quality Control Board issues strict Waste Discharge Requirements (WDRs) that mandate exact system redundancy and continuous operational resilience to protect localized groundwater and surface waters.

2. Public Health, Safety, and Sanitary Sewer Overflows (SSOs)

Wastewater continuously flows from homes, businesses, and hospitals via gravity and collections systems; it cannot be "turned off" during a grid outage. If an emergency generator fails due to a natural gas line disruption or line pressure loss during a regional disaster, a facility-wide shutdown would trigger:

- Immediate sewage backups into residential neighborhoods and commercial zones.

¹ Pursuant to the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Homeland Security (DHS), [Water and Wastewater Systems Sector-Specific Plan \(2015\)](#), "Safe drinking water is a prerequisite for protecting public health and all human activity, and properly treated wastewater is vital for preventing disease and protecting the environment. Ensuring continuity of drinking water and wastewater treatment and service is essential to modern life and the Nation's economy."



- Large-scale Sanitary Sewer Overflows (SSOs) directly violating California State Water Board General WDRs.
- Severe exposure of the public to waterborne pathogens, violating foundational health and safety codes.

3. Recycled Water and Title 22 Compliance

Many wastewater facilities within the South Coast Air Basin generate highly regulated recycled water. Under [Title 22 of the California Code of Regulations](#), recycled water facilities are subject to strict, continuous disinfection and treatment standards. Title 22 explicitly requires reliable backup power supplies to prevent the distribution of inadequately treated water into public reclamation systems. The use of diesel fuel provides the single most reliable, insulated guarantee of this continuity during catastrophic grid failures.

4. Federal Emergency Management Agency (FEMA) - [Best Practices for Critical Facilities](#)

In fact, FEMA's guidance on best practices for critical facilities cautions against relying on natural gas as the sole fuel source for emergency power. FEMA states:

“Natural gas, unlike propane and diesel, is not stored on site but rather piped to a site from a local utility. Natural gas supplies can be interrupted during high-wind, flood, or earthquake events. Also, natural gas services are often intentionally shut down prior to a storm event to reduce the risk of fires and explosions. Because of this, natural gas should not be used as a fuel for providing emergency power to critical facilities unless the facility can confirm that natural gas service will not be interrupted.”

Conclusion and Requested Action

The State Water Resources Control Board and Regional Water Boards legally require wastewater treatment plants to maintain comprehensive backup systems to ensure continuous compliance. Diesel fuel remains the standard for emergency backup power because it can be safely stored on-site, isolated from external utility failures.

We respectfully request that the South Coast Air Quality Management District explicitly **exempt water and wastewater facilities as essential infrastructure from any provisions in Proposed Rule 1110.4** that would restrict the use of emergency diesel generators or effectively mandated transition to gaseous fuels or other technologies that rely on vulnerable external infrastructure.



Environmental protection cannot be achieved by solving an air quality concern at the direct expense of a severe water quality and public health crisis.

Clean Water SoCal appreciates the opportunity to comment on PR 1110.4, and we look forward to continued collaboration. We hope that with additional information and discussion, meaningful progress can be made on these important issues.

If there are any questions regarding this transmittal, please feel free to contact me directly at (714) 878-9655 or drothbart@cleanwatersocal.org.

Sincerely,

David L. Rothbart, P.E., BCEE
Air Quality Manager – Clean Water SoCal

Attachment:

Natural Gas Pipeline Failures

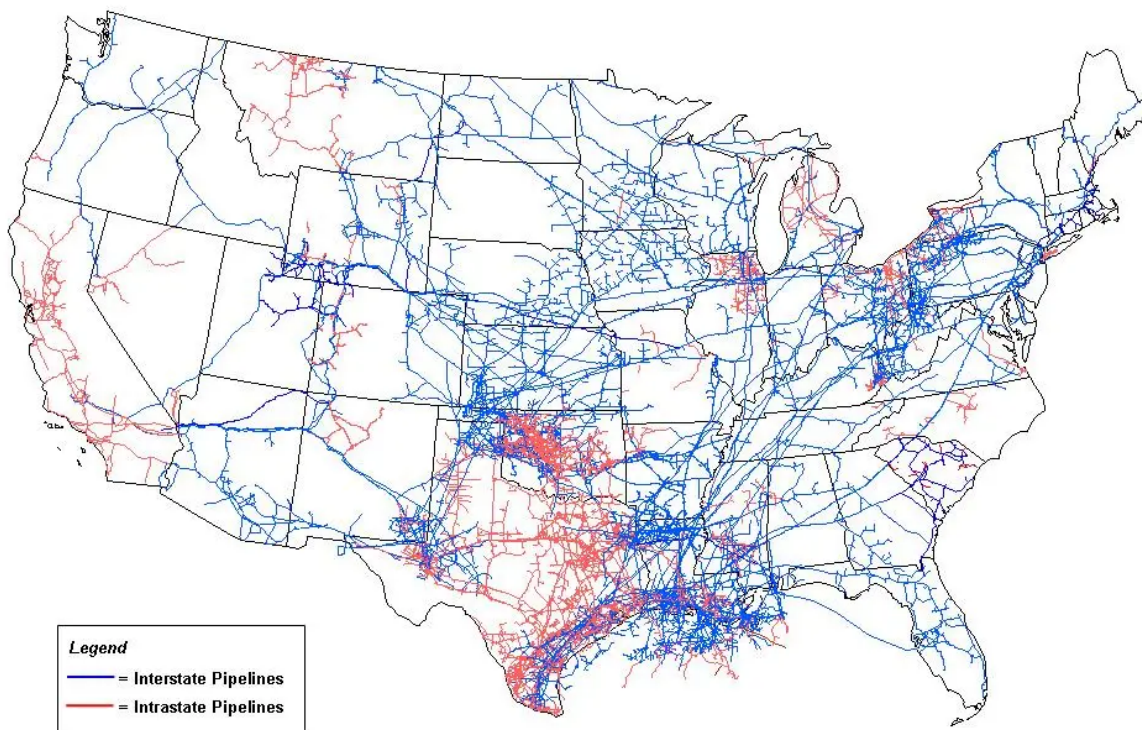
cc: Mike Krause, SCAQMD
Isabelle Shine, SCAQMD
Joshua Ewell, SCAQMD
Steve Jepsen, Clean Water SoCal
Alison Torres, EMWD
Randa Abusaban, OCSan
Jennifer McMullin, WMWD

ATTACHMENT

Natural Gas Pipeline Failures

There are about 3 million miles of natural gas pipelines in the U.S. linking production and storage sites with consumers. Within this network, there are nearly 500 natural gas pipeline incidents per year including explosions, fires, and leaks that lead to loss of life, injury, and property damage.

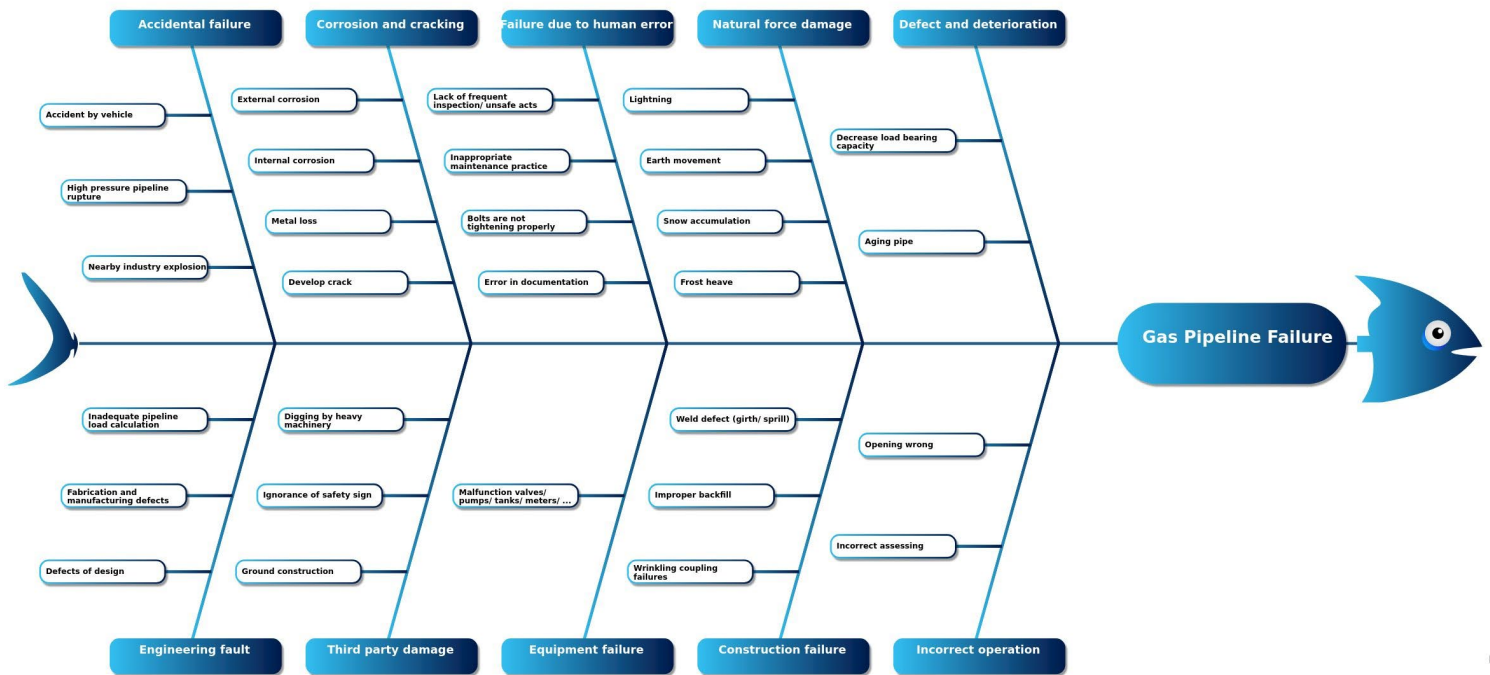
About half of the mainline network and a large portion of the local distribution network were installed in the 1950s and 1960s when demand for natural gas increased after World War II.



Source: Energy Information Administration, Office of Oil & Gas, Natural Gas Division, Gas Transportation Information System

Source: <https://areahub.com/knowledge-center/infrastructure/natural-gas-pipelines>

Causes of Leaks and Explosion in Natural Gas Pipelines



The demand for natural gas in residential and industrial areas is very high. The complex pipeline structures deliver natural gas from the production point to the consumer. Generally, a high transmission long-distance pipeline feeds the distribution pipeline for delivering natural gas in household and industrial activities. The system comprises a transmission pipeline connected with many regulator stations. Any instance of breakdown in the system may interrupt the operation. To overcome any hazard, regulators can isolate a specific section from the supply line. Data regarding natural gas pipeline failure events can determine the weak point of the gas pipeline. The natural gas pipeline leak may result in decreased air quality, fire explosion, human casualties, and economic penalties. To identify the causes, sensitive point analysis of gas pipeline failure can reduce the potential risk and enhance safety integrity for preventing accidents. The three major gas pipeline failure causes are pipe/weld material failure, excavation damage, and corrosion.

Source: <https://community.smartqed.ai/template/lib/energy-gas-pipeline-failure/>

U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

Natural Gas Pipeline Failure Investigation Reports:

1. [Failure Investigation Report](#) Marathon Pipe Line, LLC. Feb 28, 2024
2. [Investigation Report](#) - AGT/National Grid LNG, 8/13/2019
3. [Failure Investigation Report](#) Gulf South Pipeline Company, LLC. Feb 21, 2024
4. [Failure Report](#)- Columbia Gas Transmission 4/4/09
5. [Failure Report](#) - Natural Gas Pipeline Co of America 12/05/2017
6. [Failure Report](#)- Columbia Gas Transmission 1/4/09
7. [Failure Report](#)- Columbia Gas Transmission 5/7/09
8. [Failure Report](#)- Columbia Gas Transmission 11/5/08
9. [Failure Report](#)- Columbia Gas Transmission 11/16/09
10. [Failure Report](#)- Columbia Gas Transmission 4/19/09
11. [Failure Report](#)- Columbia Gas Transmission 2/13/14
12. [Failure Report](#)- Columbia Gas Transmission 11/3/11
13. [Failure Report](#)- Columbia Gas Transmission 1/11/11
14. [Failure Report](#)- Columbia Gas Transmission 8/9/15
15. [Failure Report](#)- Columbia Gas Transmission 2/1/12
16. [Failure Report](#)- Dominion Transmission Inc 10/23/08
17. [Failure Report](#)-El Paso Natural Gas 11/5/09
18. [Failure Report](#)-El Paso Natural Gas 5/2/12
19. [Failure Report](#)-El Paso Natural Gas 3/1/10
20. [Failure Report](#)- Enterprise Products Operating LLC 8/4/09
21. [Failure Report](#)- Gulf South Pipeline Company, LP 2/14/11
22. [Gulf South Pipeline Company](#), LP.-8/26/15
23. [Failure Report](#)- Hampshire Gas 3/24/09
24. [Failure Report](#)- KM Interstate Gas Transmission Co 3/9/10
25. [Failure Report](#)- National Fuel Gas 12/21/09
26. [Failure Report](#)- Northern Natural Gas Co 5/23/08
27. [Failure Report](#)- Northern Natural Gas Co. 8/6/10
28. [Failure Report](#)- Panhandle Eastern Pipeline Co 8/25/08
29. [Failure Report](#)- Southern Natural Gas 1/6/10
30. [Failure Report](#)- Southern Natural Gas 12/31/09
31. [Failure Report](#)- Southern Natural Gas 1/23/07

32. [Failure Report](#)- Southern Star Central Gas Pipeline 3/2/10
33. [Failure Report](#)- Southern Star Central Gas Pipeline, Inc. 6/30/05
34. [Failure Report](#)- TE Products Pipeline Co 9/18/05
35. [Failure Report](#)- Tennessee Gas Pipeline Co 11/30/10
36. [Failure Report](#)- Tennessee Gas Pipeline 12/8/10
37. [Failure Report](#)- Tennessee Gas Pipeline Company 3/1/11
38. [Failure Report](#)- Tennessee Gas Pipeline Company 8/3/15
39. [Failure Report](#)- Texas Eastern Transmission L.P.'s 4/13/12
40. [Failure Report](#)- Texas Gas Transmission LLC 8/4/09
41. [Failure Report](#)- TransCanada Northern Border Inc. 7/20/11
42. [Failure Report](#)- Transcontinental Gas Pipeline Company 6/9/15
43. [Failure Report](#)- Williams Gas Pipeline Transco 4/26/10
44. [Failure Report](#)- Williams Gas Pipeline-Transco 4/2/12
45. [Failure Report](#)- Williams Partners Operating LLC 3/31/14

Source: <https://www.phmsa.dot.gov/safety-reports/pipeline-failure-investigation-reports>

Notable examples of pipeline failures:

- **San Bruno, California (September 2010):** A high-pressure natural gas transmission line ruptured due to defective welds, destroying 38 homes, killing eight people, and injuring dozens. [1, 2]
- **Merrimack Valley, Massachusetts (September 2018):** Over-pressurization of an old distribution system sparked dozens of fires and explosions across three communities, leaving one person dead, displacing nearly 8,000 residents, and damaging dozens of homes. [1]
- **Coolidge, Arizona (August 2021):** An aging 30-inch transmission pipeline ruptured, creating a blast wave that destroyed a nearby farmhouse, killing two people, and causing millions of dollars in property damage. [1, 2]
- **Carlsbad, New Mexico (August 2000):** Severe internal corrosion caused a 30-inch transmission pipeline to rupture near the Pecos River, resulting in an explosion that claimed the lives of 12 campers. [1]
- **Northridge Earthquake, California (January 1994)**
Berkeley West Convalescent Hospital, Santa Monica: Offsite natural gas fuel supply was interrupted. (3)

From June 2015 to June 2017, the following incidents have been documented by Green America:

February 17, 2017: A natural gas pipeline operated by Kinder Morgan in Refugio Texas exploded creating a massive fire. The explosion shook homes 60 miles away.

February 10, 2017: A natural gas pipeline operated by Phillips 66 Pipeline in St. Charles Parish, LA exploded, injuring 3 workers.

February 1, 2017: A DCP pipeline in Panola County TX exploded and created a crater in an airport runway, shutting down the airport for a month.

January 17, 2017: A natural gas pipeline operated by DCP Midstream exploded in Spearman, TX, which led to multiple fire crews being called to the scene.

August 20, 2016: 10 people in New Mexico were killed when they were camping near an underground natural gas pipeline operated by El Paso Energy that suddenly exploded.

April 18, 2016: 2 workers were killed when they struck a pipeline at the Southcross Gas Processing Plant in Bonnie View, TX.

April 29, 2016: A 30-inch pipeline in Salem Township, operated by Spectra, exploded, severely injured a worker, and caused the evacuation of local businesses and homes.

January 9, 2016: A 30-inch pipeline operated by Atmos Energy in Robertson County, TX exploded and forced the evacuation of several families.

August 26, 2015: Two workers were injured when a Boardwalk/Gulf South Pipeline Co underwater pipeline off the coast of Louisiana ruptured and exploded.

June 27, 2015: Four workers were injured when a pipeline exploded at a gas booster station in White Deer Texas.

June 17, 2015: A pipeline operated by Energy Transfer Partners ruptured in Cuero, TX and caused a massive blaze and the evacuation of 7 families. 165,732 pounds of volatile organic compounds may have burned.

Source: <https://greenamerica.org/natural-gas-pipeline-and-infrastructure-explosions-nationwide>