

LAX MASTER PLAN

COMMUNITY BENEFITS AGREEMENT (CBA)

2012 ANNUAL PROGRESS REPORT





Los Angeles World Airports Facilities Management Group

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Prepared by

Los Angeles World Airports

LAX Master Plan Program 2012 CBA Annual Progress Report December 2013

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1.0 Executive Summary

On December 6, 2004, the Los Angeles World Airports' Board of Airport Commissioners (BOAC) unanimously approved an agreement with the LAX Coalition for Economic, Environmental and Educational Justice (Coalition) that provides environmental mitigation programs and jobs-related benefits to communities that would be impacted by the implementation of the Los Angeles International Airport (LAX) Master Plan.

The Community Benefits Agreement includes measures to mitigate noise, pollutant emissions, and traffic impacts of the Master Plan, as well as benefits such as job training and hiring programs for eligible residents of the Project Impact Area (PIA)¹ and the City of Los Angeles. The agreement precludes LAWA from making expenditures or taking actions prohibited by the Federal Aviation Administration (FAA) or any other regulatory authority. The Cooperation Agreement also prohibits the use of Los Angeles City's General Fund or any other City-controlled non-airport source of funds to meet any of LAWA's obligations under the Agreement.

In accordance with Section XVI "Miscellaneous" of the Agreement, LAWA is required to prepare annual reports on the implementation of the Community Benefits Agreement and the progress of the LAX Master Plan Program. LAWA is to provide the annual reports to the Coalition Representatives and make them available for at least one month on the LAWA website. This document is the eighth annual report on the progress of the Agreement. This document has been provided to the Coalition Representative and is available at LAWA website http://www.ourlax.org/comBenefits.aspx.

¹ Project Impact Area includes the communities immediately surrounding the airport and those most impacted by airport operations, and is comprised of South Los Angeles, El Segundo, Hawthorne, Inglewood, and Lennox.

2.0 Introduction/Background

The Community Benefits Agreement is comprised of several documents as follows:

- 1. <u>Cooperation Agreement.</u> The Cooperation Agreement sets out the legal framework of the Agreement, including conditions, commitments, obligations, enforcement, etc.
- Community Benefits Agreement (CBA). The CBA, an attachment to the Cooperation Agreement, details the various proposals of mitigation and benefits. The various proposals include:

Noise Mitigation

- Increased Funding for Airport Noise Mitigation Program
- End-of-Block Soundproofing
- Suspension of Avigation Easement
- Limitations on Nighttime Departures

Economic Development Benefits

- Job Training Program
- Work Experience Programs
- First Source Hiring Program
- Small Business Attraction and Retention Program
- Living Wage, Worker Retention, and Contractor Responsibility

Community Environmental/Health Studies

- LAX Air Quality and Source Apportionment Study
- Health Study of Upper Respiratory System and Hearing Loss Impacts
- Environmental Justice Community-Based Research Studies

Air Quality/Emission Reductions and Control

- Electrification of Passenger Gates
- Electrification of Cargo Operations Areas
- Electrification of Hangars
- Emission Reductions from Ground Service Equipment
- Emission Reductions from On-Road Trucks, Buses, and Shuttles
- Conversion of On-site Trucks, Shuttles, and Buses to Alternative Fuel

- Limits on Diesel Idling
- Assessment and Mitigation of Particulate Matter
- Provision of Alternative Fuel

Environmental Mitigations/Commitments for Construction

- Construction-Related Diesel Emission Reduction Requirements
- Rock Crushing Operations/Materials Stockpiles Away from Residential Areas
- Application of Green Building Principles
- Diversion of Construction Traffic from Residential Streets

Settlement Agreement with Inglewood Unified School District. This Agreement includes the conditions, commitments, obligations, enforcement, etc., of both LAWA and the Inglewood Unified School District in the provision of the following:

LAWA Funding of Certain District Mitigation Measures: LAWA will fund certain mitigation measures for the Inglewood Unified School District in an amount not to exceed \$118,500,000 for noise abatement.

Security-Related Items: LAWA will assist the Inglewood Unified School District in the coordination and dissemination of appropriate information related to emergency preparedness and response of local law enforcement agencies, emergency response groups, and the local communities in the event of an airport-related emergency.

Community Programs: LAWA will work collaboratively with the Inglewood Unified School District to support a variety of community programs, such as job training and academic programs.

4. <u>Settlement Agreement with Lennox School District.</u> Similarly, this Agreement includes the conditions, commitments, obligations, enforcement, etc., of both LAWA and the Lennox School District in the provision of the following:

LAWA Funding of Certain District Mitigation Measures: LAWA will fund certain mitigation measures for the Lennox School District not to exceed \$111,000,000 for noise abatement.

Security-Related Items: LAWA will assist the Lennox School District in the coordination and dissemination of appropriate information related to emergency preparedness and response of local law enforcement agencies, emergency response groups and the local communities in the event of an airport-related emergency.

Community Programs: LAWA will work collaboratively with the Lennox School District to support a variety of community programs, such as job training and academic programs.

The execution of the specified elements of the Agreements is tied to final City Council and FAA approval of the LAX Master Plan Program. As described in each Agreement, LAWA's obligations are conditioned upon FAA approval of these expenditures and use of airport revenues for these specific purposes. Under no circumstance will any of LAWA's obligations under these Agreements require any expenditure from the City's General Fund or any other City-controlled source of funds.

3.0 Community Benefits Agreement Progress Update

Section III. Residential Noise Mitigation

III.A Funding of Aircraft Noise Mitigation Program (ANMP)

The Agreement states:

"Beginning in fiscal year 2004-2005, LAWA shall fund its Aircraft Noise Mitigation Program (ANMP) at least at the following levels:

- \$4.275 million per year for the Inglewood component; and
- \$4.275 million per year for the County of Los Angeles component.

These funding levels shall be met by LAWA. LAWA shall use additional revenue, including Airport Improvement Program funds, as appropriate. LAWA expenditure of funds under this Section III.A is contingent on the City of Inglewood and the County of Los Angeles complying with all requirements established in BOAC Resolution Nos. 21481 and 21360, and with FAA regulations."

Status → In Progress:

The County of Los Angeles requested funding for 2011 and 2012 in the amount of \$9,225,000 each. The County provided a final grant report for a previously closed grant (Grant Implementation Program #7- GIP 7) in October of 2012. Authorization and funding for the 2011 request of \$9,225,000 was awarded in November 2012. The County of Los Angeles received retention funds of \$750,000 for grant GIP 7 according to the retention policy in place at that time. The County is in compliance with all program requirements.

The City of Inglewood, for the fourth year in a row, has not requested any annual funding. Inglewood is working extensively with LAWA to bring all program requirements and reports up to date in order to request new funds in 2013.

Therefore, the allocation of new funds in 2012 is as follows:

Calendar Year 2012

County of Los Angeles (component)	\$9,225,000.00
Inglewood (component)	\$0.00
Total	\$9,225,000.00

III.B Acceleration of Noise-Mitigation Programs for City

The Agreement states:

"Within eight months of the effective date of this Agreement, LAWA will provide a written schedule and work program to the Coalition Representative that is designed to achieve completion of the ANMP soundproofing program for the City

by the end of 2008, and will take all reasonable steps to timely implement that schedule and work program."

Status → In Progress:

Progress on this program is driven by the voluntary participation of impacted residential homeowners in the communities of Playa del Rey, Westchester, and South Los Angeles. LAWA staff completed notification to all property owners of their eligibility in April 2010. The estimated construction completion date for the City of Los Angeles' program is 2013. LAWA has spent approximately \$150 million to-date on the implementation of this program.

III.C Acceleration of Noise-Mitigation of Places of Worship

The Agreement states:

"LAWA shall accelerate the program of soundproofing Places of Worship as part of the ANMP in effect as of the effective date of this Agreement. Within eight months of the effective date of this Agreement, LAWA shall conduct a needs assessment for this program, in consultation with the Coalition Representative. LAWA shall provide annual reports on the progress of the program."

Status → In Progress:

Coordination with the Coalition on this provision is on-going.

III.D End of Block Soundproofing

The Agreement states:

"Within one year of the completion of the current ANMP for participating jurisdictions, LAWA shall commence an end-of-block soundproofing program, under which, if any residence on a particular city-block falls within the applicable noise contour for that block, then each residence on that block will be eligible for noise mitigation as described in this Section III.D. Offers of soundproofing shall be made to the owner of each residence, whether or not the owner of that residence chose to participate in previous soundproofing programs. Soundproofing under this program shall reduce interior noise at participating residences to an interior CNEL of 45 decibels or less, within habitable rooms."

Status \rightarrow On-going:

Progress on this program is driven by voluntary participation. Within the City of Los Angeles, all end-of-block eligible property owners have been notified (via certified mail) of their eligibility in the program. Approximately 1,200 dwelling units were added under the block rounding program that utilizes Passenger Facility Charge (PFC) funding approved by the FAA. The estimated construction completion date for the City of Los Angeles' program is 2013. The County of Los Angeles and the City of El Segundo have both submitted and received FAA approval of End of Block proposals, and have subsequently included additional homes within the Airport Improvement Program (AIP) funding eligible areas. The City of Inglewood, submitted an end of block proposal to the FAA in 2012. The FAA asked the City to edit their End-Of-Block proposal with only the FAA- approved Alternative D 65 contour. The City of Inglewood is expected to resubmit a new proposal in 2013 with that specific contour.

LAWA fully supports these efforts, and will provide supplemental funding to the jurisdictions to mitigate those properties. All eligible properties are prioritized according to the program requirements, including generally mitigating the most highly impacted areas first.

III.E Suspension of Avigation Easement

The Agreement states:

- 1. Present Avigation Easement Requirements. All homeowners receiving LAWA provided or funded noise insulation measures within the 65 dBA CNEL noise contour presently must execute express, full avigation easements (as set out in Exhibit A). In return for LAWA's providing these noise insulation benefits, each homeowner presently must sign a full, express avigation easement (as set out in Exhibit A), expressly waiving his or her ability to sue LAWA with respect to the impacts (listed in the avigation easements) that are created by aircraft operations at LAX on the affected residences.
- 2. Proposed Modified Easement Requirements. In order to promote the cooperation between LAWA and the Coalition that is envisioned by this Agreement, and as long as this Agreement remains in effect, LAWA agrees to suspend its requirement that express, full avigation easements (as set out in Exhibit A) be executed by homeowners receiving LAWA provided or funded noise insulation benefits for particular residences located within the 65 dBA CNEL noise contour in the City of Los Angeles, City of Inglewood, and Los Angeles County communities of Lennox and West Athens, and only under the following circumstances:
 - Caltrans approves LAWA' compromise position as described in this Agreement during the effective term of this Agreement. This approval is necessary because Caltrans currently requires avigation easements as part of LAWA's ongoing noise variance within its permit from Caltrans to operate LAX;
 - b. In lieu of requiring full, express avigation easements (as set out in Exhibit A), the homeowners will execute the Noise Easement attached as Exhibit B. The homeowners will provide, among other things, a written acknowledgment, accompanying the homeowner's authorization to proceed with the installation that the homeowner is aware of the proposed level of noise reduction that the installation is intended to provide. After the installation, the homeowner will execute an acknowledgement that the improvements have been installed and have attenuated the noise.

LAWA promises to make all reasonable efforts to obtain Caltrans' expedited approval of suspension of the requirement for full, express avigation easements

(as set out in Exhibit A) and use of the Noise Easement (as set out in Exhibit B) in its place."

Status → Completed:

The dedication of avigation or any other easements in return for funding of, or participation in, the residential soundproofing program has been eliminated pursuant to the terms of a separate, independent agreement, the LAX Master Plan Stipulated Settlement Agreement, except under very limited circumstances as required by California Airport Noise Standards. Under these limited criteria, a modified noise easement similar to the one proposed by the CBA is being used.

III.F Compatibility with Local Building Codes

The Agreement states:

"LAWA shall not require property owners participating in the ANMP to satisfy regulations or standards related to property conditions where these regulations or standards are more stringent than those actually enforced by the local government jurisdiction possessing code enforcement authority over the property in question."

Status \rightarrow No action at this time:

No action is required on this provision as LAWA does not impose regulations or standards related to property conditions that are more stringent than those enforced by the local government jurisdiction as these requirements are not part of LAWA's noise mitigation programs.

III.G Limitations on Nighttime Departures

The Agreement states in part:

"LAWA and the Coalition agree that restrictions on departures between the hours of midnight and 6:30 a.m. over the communities to the east of LAX would be desirable, when LAX is operating under normal weather conditions (when LAX is either in Over-Ocean Operations or remains in Westerly Operations and excluding times when LAX operates in Easterly Operations). This is known as the "LAX Proposed Restriction".

- Part 161 Study. By April of 2005, LAWA shall have completed a Contract Award Process for a study on the feasibility of implementing the LAX Proposed Restriction (the "Part 161 Study"). Within 90 days of the contract award, the contract will have commenced. LAWA shall require that the Part 161 Study meet the relevant requirements of 14 C.F.R. Part 161, and that the entity performing the Study provide annual reports to LAWA on study progress and findings"...
- 2. Record of Eastbound Departures. LAWA shall maintain a record of all nighttime eastbound departures during Over-Ocean Operations and Westerly Operations. This record shall be made available to the public on the LAWA website and shall be updated monthly.

3. Community Response Program. LAWA shall operate a community response program through which the public may report nighttime flights in the areas east of LAX. LAWA shall maintain a record of all individual reports, and shall prepare annual reports documenting individual reports, including records of airline, flight, date, and time of each reported flight, where possible. All records of reports, excluding the reporting individual's name and address, shall be maintained as public records and posted on the LAWA website."

Status → In Progress:

The Part 161 Study process encompasses three general elements including: (1) data collection and analysis to justify the LAX Proposed Restriction; (2) evaluation and explanation of the legal, environmental, and economic impacts of the proposed restriction; and (3) preparation and submittal to the FAA of the required reports and application materials. LAWA began the Part 161 Study in June 2005.

The LAX Part 161 Study was completed in September 2012, and the Part 161 draft application was released on November 1st for public review and comment through December 17th. The study indicates that the LAX Proposed Restriction complies with the six statutory conditions of the Airport Noise and Capacity Act of 1990 and the Part 161 regulations. The baseline and projected fleet mix forecasts were revised to reflect the new 2013 implementation and 2018 forecast years and received FAA approval. LAWA conducted the Public Outreach Program, with a public workshop on November 13th and briefings for the LAX Noise Roundtable and the LAX Area Advisory Committee during their November meetings. The application was submitted to the FAA in January 2013.

The Record of Eastbound Departures and the Nonconforming East Departures Annual Complaint Reports are posted on LAWA's website at http://www.lawa.org/LAXNoiseEDR.aspx.

LAWA maintains a community response program where the public can report flights at any time of the day and related to any location. LAWA maintains records of all individual reports, prepares monthly and annual summary reports, and all reports are available on the LAWA website.

Section IV. Job Training

The Agreement states in part:

"Job Training Program. Beginning in fiscal year 2005-2006, LAWA shall provide \$3 million per year for five years, not to exceed \$15 million over five years, to fund job training for Airport Jobs and Aviation-Related Jobs, and for Preapprenticeship Programs. Any funds unspent in a particular year shall be rolled over to the subsequent year. At the conclusion of the five-year period, any unused funds shall revert to the job training funds described in Section XV..."

Status \rightarrow In Progress:

Job Training Program

Although the FAA has not approved a job training program (JTP) for LAWA, and therefore no LAWA funds may be used for job training, LAWA leverages its relationships with various agencies funded to provide job training.

By leveraging relationships with over 16 JTP partners, LAWA, through its Business and Job Resources Division (BJRD) initiated its JTP in January 2007. LAWA was successfully able to partner with agencies funded through other means to provide job training opportunities to residents in the PIA. Currently, LAWA is working with agencies that provide an array of training, including computer skills, customer service, time management, bilingual skills, leadership skills, and other classes.

Based on surveys to employers, both internally and externally, new training courses, including Conversational Spanish for Concessions Division staff, and Management training in the areas of communication, coaching, and interviewing took place last year. The conversational Spanish course officially started on September 8, 2010 with a class of about 20 LAWA students and continued throughout 2011, training more than 80 individuals. Several beginning and intermediate Spanish classes were held throughout the year.

Many local residents have completed training in customer service, retail sales, auto mechanics and other disciplines through the LAWA partnerships. The Mayor's Office has initiated discussions with Worksource Centers, the Los Angeles Community College District and surrounding LAWA businesses to conduct Hospitality Training for local residents. Plans are underway to create training modules that will result in career paths for residents within the hospitality industry. Upon the completion of training, these candidates will be wellpositioned to compete for job opportunities at the hotels or with various Airport employers.

In addition, LAWA has partnered with Santa Monica College to offer opportunities for customized training in the following areas at no cost to LAWA's employees: Business Skills, Continuous Improvement and Professional Development, Computer and Technology Skills, Leadership and Team Building among other areas. LAWA, along with the LAX Coalition, will continue to assess other job training opportunities and/or areas for collaboration with local training providers.

As of December 31, 2012 JTP Referrals: 694 Completed Training 396* *This number includes new employees as well as incumbent workers.

Training Goals for 2013JTP Referrals:825Completed Trainings:520

Section V. First Source Hiring Program

The Agreement states in part:

"First Source Hiring Program for Airport Jobs. The First Source Hiring Program shall provide early access to targeted applicants for available Airport Jobs, and employers will receive prompt, cost-free referrals of qualified and trained applicants. Except where City's Worker Retention Policy requires retention of particular workers, LAWA shall require participation in the First Source Hiring Program with regard to all Airport Jobs by any:

- New Airport Contractor, Airport Lessee, and/or Airport Licensee resulting from the approved LAX Master Plan Program;
- Airport Contractor that enters into or receives a new, amended, or renewed Airport Contract, or receives a voluntary extension of an existing Airport Contract;
- Airport Lessee that enters into or receives a new, amended, or renewed lease of any property owned by LAWA, or receives a voluntary extension of an existing lease; and
- Airport Licensee that agrees, receives, or is subject to a new, amended, extended, or revised licensing or permitting agreement or set of requirements.

As of July 1, 2005, LAWA shall ensure that the First Source Hiring Program, attached as Exhibit C, is a material term of all Airport Contracts, lease agreements, and licensing or permitting agreements or sets of requirements that are new, extended, amended, renewed, or revised. Under these Airport Contracts, agreements, or requirements, employer participation in the First Source Hiring Program shall commence on the effective date of the Airport Contract agreement, or requirement in question, or on July 1, 2005, whichever is later...."

Status \rightarrow In Progress:

The First Source Hiring Program (FSHP) is designed to provide residents from the communities immediately surrounding the airport and those most impacted by airport operations access to airport jobs. Those communities are a part of the Project Impact Area (PIA) and are comprised of South Los Angeles, El Segundo, Hawthorne, Inglewood and Lennox.

The FSHP is now automated with an Applicant Tracking System (ATS) to quickly assist those LAWA employers in need of prescreened and qualified individuals for employment consideration. Over 14,000 people have registered and posted their resumes on the ATS.

The Business and Jobs Resources Center (BJRC) works closely with the Work Source, One-Stop Centers and, community and faith-based organizations that serve the airport area and beyond to register potential candidates on the ATS for positions with LAWA employers. FSHP is training the job developers at these organizations to prescreen and qualify their clients to be eligible for opportunities at LAWA as they arise. Their clients are able to post their resumes and apply for positions and those applications are reviewed by hiring managers in the terminals. The BJRC also participates in the Mayor's monthly roundtable with the Port of Los Angeles and the Los Angeles Department of Water and Power to discuss and work through workforce development initiatives and on the Mayor's South Los Angles Initiative. The purpose of this initiative is to ensure job opportunities for those residents that experience disproportionate levels of poverty and unemployment compared to the general population, many of whom live in the designated Project Impact Area.

As new concessions contracts are being awarded, we will be working with the prime contractors to coordinate Targeted Recruitment Events and bring prescreened candidates for interview consideration. The FSHP hosted two such events for Delaware North Corporation at the Proud Bird Restaurant in January 2012 and Crews of California at the Flight Path Museum and Learning Center in May 2012. At both events, over 300 applicants were interviewed for food service positions at food and beverage locations within LAX. Over 60 percent of the prescreened applicants were selected by the respective companies.

During 2012, we hosted targeted interviews for the following companies at the BJRC Offices:

- Allegiant Airlines
- Areas, U.S.A.
- Crews of California
- Delaware North Companies
- Duty Free Shops, North America
- Hudson News

Human Resources Managers from these companies utilized office space at BJRC to conduct interviews away from their confined space in the Terminals. These events yielded many new hires for their respective companies.

As of 6/30/20	12 - Actual
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FSHP	Referrals:	9,073	Hires:	996
Hiring Goals:		Through June 2012		through June 2013
FSHP			954	1107

The opening of the Tom Bradley International Terminal Extension in 2013 and the selection of Westfield as the Terminal Concession Manager will bring new employment opportunities to LAWA. Westfield estimates that upon completion they will open over 60 Food & Beverage and Retail locations to serve the travelling public in the new facility. This will translate into hundreds of new jobs for local residents.

Gateways Internship Program

The Gateways Internship Program provides college and high school students with exposure to career opportunities in the aviation industry and other airport-related jobs. The Gateways Program gives students on-the-job practical experience in various airport jobs through education, training, and mentoring activities to better prepare them to enter the workforce. The Gateways Internship Program has partnered with various colleges such as UCLA, USC, Cal State University of Long Beach, Cal State University of Los Angeles, Loyola Marymount, West Los Angeles College, Cal State Fullerton, CSUN, Cal State University Dominquez Hills, Chapman-Brandman University, Cerritos College, Santa Monica College, East Los Angeles Community College, Trade Technical College, Southwest College, and Cerro Coso College. LAWA also partners with Watts Labor Community Action Committee (WLCAC), and Los Angeles Job Corps to place students into its internship program. Since its inception, the Gateways Program has placed more than 900 students in a wide range of internship positions, including Accounting, Administrative, Airfield Operations, Airports Development, City Attorney Office, Commercial Development Group, IMTG, Engineering and Facilities Management, , Environmental Management, Landside, Noise Management, Community Relations, Public Relations, and FAA-related.

LAWA's Gateways Program is comprised of three internship programs:

- Gateways College Student Professional Worker Program
- Gateways Volunteer Internship Program
- Gateways International Student Professional Worker Program

The BJRC was able to place over 70 students through its three programs within various internships in LAWA Divisions this year. This increase in internship positions was accomplished primarily through funding partners included community and faith based organizations and colleges.

The BJRC conducted extensive outreach to students by attending Career Day events at colleges, posting internship job descriptions to the college career sites, and connecting with various college career centers and advisors. BJRC also disseminated internship information at 35 community job fairs. Additionally, the BJRC has continued its relationship with Cerritos College to place IT students with LAWA through its approved prerequisite course work to the program. The BJRC also continues its partnership with City of Los Angeles Public Works High School Internship Program.

In addition to students from local and out-of-state schools, the BJRD also attracts international students who wish to volunteer at LAX. BJRC hosted international students from China, Germany, Korea, and Japan.

Goals for Next Year

Program goals for the upcoming year will be to increase the number of paid positions through partnerships with other organizations, and to increase the volunteer internship numbers by continuing our current relationships with the various colleges and community and faith based organizations. Also, BJRC plans to reach out to colleges that have not participated in the internship programs. Partner with new organizations that provide internship opportunities to students and increase international student participation, through other organizations such as Cultural Vistas and the Mayor's International Internship Program.

Section VI. Living Wage, Worker Retention, and Contractor Responsibility

The Agreement states:

"LAWA shall apply to all Airport Contractors, Airport Lessees, and Airport Licensees the City's Living Wage Ordinance, as set forth in Los Angeles Administrative Code Section 10.37; the City Worker Retention Policy, as set forth in Los Angeles Administrative Code Section 10.36; and the Contractor Responsibility Program set forth in BOAC Resolution No. 21601, in accordance with City policy."

Status → Completed:

This provision currently applies to all LAWA contracts as set forth in Board Resolution No. 21601.

Section VII. Air Quality Study

The Agreement states in part:

"Air Quality Study. LAWA shall fund a study by an Independent Expert of toxic air contaminants and criteria air pollutant emissions from jet engine exhaust and other emission sources ("Air Quality Study"). In addition to other contaminant and pollutant emissions, the Air Quality Study shall measure jet engine exhaust emissions and provide chemical composition data from a representative sample of engine types and ages under a variety of conditions that reflect actual operations, and shall include this data and all other relevant study results as part of the final study provided to LAWA."

Status \rightarrow In Progress:

In August 2011, LAWA selected Tetra Tech, Inc., from its existing environmental on-call contractors to conduct Phase III with a budget not-to-exceed \$2.75 million (the contract used for Phases I and II had expired).

The Study approach included a total of 17 monitoring sites, consisting of "core monitoring stations", "community satellite sites", and "saturation sampling sites." Four core monitoring stations were located in the communities surrounding LAX:

- Community North Westchester
- Community South El Segundo
- Community East Lennox
- Upwind Northwest Site Playa del Rey

There also were four smaller satellite sites located in Hawthorne, Westchester, El Segundo, and west of LAX; and gradient sampling to provide measurements for a subset of air pollutants at nine additional sites throughout the areas surrounding the airport.

The air quality monitoring began in 2012 and successfully occurred over two seasons to account for typical seasonal changes in meteorology, airport operations, and the associated effects on pollutant transport and dispersion. The winter season was from January 31, 2012 through March 13, 2012, and the summer season, was from July 18, 2012 through August 28, 2012. The analysis of the monitoring and modeling results was performed in the latter half of 2012 and the report preparation is expected to be complete by June 2013.

VIII. Health Study

The Agreement states in part:

"Health Study. LAWA shall fund a study to measure and investigate upper respiratory system and hearing loss impacts of LAX operations due to the LAX Master Plan Program. LAWA, in consultation with the Coalition Representative, shall develop a scope of work and objectives for the Health study..."

Status \rightarrow Not applicable at this time:

It is expected that the Health Study will commence after the completion of the Air Quality Study described in Section VII.

Section IX. Community-Based Research Studies as Part of LAWA's Future LAX Master Plan Program Project-Level Analysis

The Agreement states in part:

"Inclusion in Project-Level Environmental Analysis. LAWA acknowledges that, pursuant to CEQA, it will perform additional environmental review on the various LAX Master Plan Program project components as they are processed for future approval. In undertaking this additional environmental review, LAWA shall require the general contractor preparing the environmental documents for these future project-level analysis to subcontract with an Independent Expert to coordinate community-based research studies as described in Section IX.B (the "Community-Based Studies"), that are designed to become a part of the environmental analysis. LAWA shall expend no less than \$300,000 on the Community-Based Studies. As future project-level environmental documents are prepared for LAX Master Plan Program projects, LAWA is not required to utilize the Community-Based Studies as part of each project-level environmental review, and shall have discretion to determine whether a particular project-level analysis would be appropriate for including the Community-Based Studies..."

Status \rightarrow Not applicable at this time:

LAWA determined that none of the project-level environmental analysis conducted in 2012 was appropriate for including the Community-Based Studies.

Section X. Air Quality

The Agreement states in part:

Section X.A. Electrification of Passenger Gates

- "1. Passenger Gate Electrification Schedule. LAWA shall ensure that all Passenger Gates are equipped and able to provide electricity sufficient for aircraft needs under the following schedule:
 - a. All Passenger Gates for which new construction (excluding maintenance) is completed after the effective date of this Agreement shall be equipped and able to provide electricity to parked aircraft from date of initial operation and at all time thereafter.
 - b. Three years from the effective date of this Agreement, and at all times thereafter, at least fifty percent of Passenger Gates at LAX shall be equipped and able to provide electricity to parked aircraft.
 - c. Five years from the effective date of this Agreement, and at all times thereafter, one hundred percent of Passenger Gates at LAX shall be quipped and able to provide electricity to parked aircraft.
- 2. Aircraft Use of Gate-Provided Electricity. LAWA shall ensure that gateprovided electricity is provided to all aircraft parked at Equipped Passenger Gates and, except for the exemptions identified in this section, that all aircraft use the gate-provided electricity in lieu of engine operation of aircraft or mobile/ground auxiliary power units...
- Assessment of Electrification of Passenger Loading Areas. LAWA shall conduct an assessment of operations at Passenger Loading Areas for the purpose of determining whether electrification of Passenger Loading Areas is Operationally Infeasible. The assessment shall include, but not limited to, inventory utilization, operations, technological trends, and capital and maintenance costs...
- 4. Commuter Flight Loading and Unloading. By the conclusion of the LAX Master Plan Program, loading and unloading of passengers of commercial aircraft shall be performed only through Passenger Gates."

Status → Completed:

All passenger gates, i.e., terminal and regional boarding ramp gates are electrified with 400 hertz ground power.

Section X.B. Electrification of Cargo Operations Areas

"1. Cargo Operations Areas Electrification Schedule. LAWA shall ensure that all, unless determined under procedures described below to be Operationally Infeasible and/or Technically Infeasible, all Cargo Operations Areas are

equipped and able to provide electricity sufficient for aircraft needs as following:

- a. All Cargo Operations Areas for which new construction, not maintenance, is completed after the effective date of this Agreement shall be equipped and able to provide electricity to parked aircraft from date of initial operation of the Cargo Operations Area at LAX and at all time thereafter.
- b. Three years from the effective date of this Agreement, and at all times thereafter, at least fifty percent of Cargo Operations Areas at LAX shall be equipped and able to provide electricity to parked aircraft.
- c. Five years from the effective date of this Agreement, and at all times thereafter, one hundred percent of Cargo Operations Areas at LAX shall be equipped and able to provide electricity to parked aircraft.
- 2. Aircraft in Cargo Operations Areas Use of LAX-Provided Electricity if Available. LAWA shall ensure that electricity sufficient for aircraft needs is provided to all aircraft parked at Equipped Cargo Operations Areas and that all these aircraft use LAX-provided electricity as power in lieu of engine operation of aircraft or ground/mobile auxiliary power units...
- 3. Assessment of Electrification of Cargo Operation Areas and Feasibility Evaluation. LAWA shall conduct an assessment of Cargo Operations Areas for the purpose of evaluating whether electrification of a particular Cargo Operations Areas is Operationally Infeasible and/or Technically Infeasible. The assessment shall include, but not limited to, inventory utilization, operations, technological trends, and capital and maintenance costs..."

Status → In Progress:

LAWA completed the first phase of a feasibility assessment in 2006. LAWA has determined that an updated assessment of the electrification program is needed to account for changes on the Airport over the past few years, including remodeling and renovation of some terminals and facilities and airlines moving to different locations on the Airport.

In 2012, LAWA began a comprehensive feasibility assessment for electrification of cargo areas. Airport cargo activity patterns have made it challenging to identify ideal electrification unit locations.

Section X.C. Electrification of LAX hangars

"LAWA shall conduct an assessment of operations at LAX Hangars for the purpose of determining whether electrification of LAX Hangars to provide electricity sufficient for aircraft needs at LAX Hangars is Operationally Infeasible and/or Technically Infeasible. The assessment shall include, but not be limited to, inventory utilization, operations, technological trends, and capital and maintenance costs..."

Status → In Progress:

LAWA completed the first phase of a feasibility assessment in 2006. LAWA has determined that an updated assessment of the electrification program is needed to account for changes to the Airport over the past few years, including remodeling and renovation of some terminals and facilities and airlines moving to different locations on the Airport.

In 2012, LAWA began a comprehensive feasibility assessment for electrification of hangar areas. Airport activity patterns have made it challenging to identify ideal electrification unit locations.

Section X.D. FAA Prohibition

"If an FAA Determination, as defined in and pursuant to the procedures set out in the Cooperative Agreement, or any other regulatory authority prohibits LAWA from taking actions required by Subsections A through C of this Section X, or threatens to withhold federal funding if LAWA takes actions required by Subsections A through C of this Section, then LAWA shall set aside \$1.7 million to the air quality fund described in Section XV."

Status \rightarrow Not applicable at this time:

Action is required only if the FAA prohibits LAWA from implementing this section.

Section X.E. Reporting

"LAWA shall report in writing to the Coalition Representative on the progress of electrification of Passenger Gates, Cargo Operations Areas, and LAX Hangars semiannually. Reports shall include, but not be limited to, the number and types of facilities and areas electrified, operational guidelines issued, a summary of exemptions granted, reports of violations of usage requirements, and actions taken by LAWA to enforce usage requirements."

Status \rightarrow In Progress:

LAWA has provided a status of the electrification program in each of the annual CBA reports. Section X.F. Construction Equipment

Best Available Emission Control Devices Required. LAWA shall require that all diesel equipment used for construction related to the LAX Master Plan Program be outfitted with the best available emission control devices primarily to reduce diesel emissions of PM, including fine PM, and secondarily, to reduce emissions of NOx. This requirement shall apply to diesel-powered off-road equipment (such as construction machinery), on-road equipment (such as trucks) and stationary diesel engines (such as generators).

Status → In Progress:

As stipulated in Section X.F.8 of the Community Benefits Agreement (CBA), an Independent Third Party Monitor was retained by LAWA to monitor compliance with the requirements of Section X.F. The role of the Independent Third Party Monitor is to monitor, document, and report on a semi-annual basis to LAWA and the Coalition on compliance with all elements of Section X.F, including but not limited to the use of verified diesel emission control systems (VDECS) on LAX Master Plan Program construction-related diesel equipment, a summary of exemptions granted, and any reports of violations or noncompliance with the requirements of CBA Section X.F.

The following is an update of activities and findings reported by the Independent Third Party Monitor as it relates to diesel construction equipment utilized on the Taxiway S, the Tom Bradley International Terminal, and American Airlines Lowboy Hangar Demolition construction projects:

Section X.F.1 – Best Available Emissions Control Devices Required

All diesel equipment used for construction related to the LAX Master Plan Program is required to be outfitted with best available emission control devices, primarily to reduce diesel particulate matter emissions, including fine particulate, and secondarily to reduce emissions of oxides of nitrogen (NOx). This requirement applies to diesel-powered off-road equipment, on-road equipment, and stationary diesel engines. The emission control devices utilized for the equipment at the LAX Master Plan Program construction shall be verified or certified by the California Air Resources Board (CARB) or Environmental Protection Agency (EPA) for use on on-road or off-road vehicles or engines.

Status \rightarrow In Progress:

The Independent Third Party Monitor reviewed the documentation submitted by the Contractors for each piece of diesel equipment utilized or planned for possible utilization on the Taxiway S, Tom Bradley International Terminal, and American Airlines Hangar Demolition projects relative to compatibility with Best Available Emissions Control Devices. Approximately 397 pieces of diesel equipment have been assessed to determine compatibility with a CARB-verified or EPA-certified diesel emission control device.

To assist in performance of this Section, the Independent Third Party Monitor developed and implemented a monitoring process to track each piece of diesel equipment and document each construction firm's compliance as it related to outfitting their diesel construction equipment with the best available emissions control devices.

The findings for this Section are as follows:

- Taxiway S was designated as substantially complete as of June 30, 2012. Independent Third Party Monitoring documented 68 pieces of equipment, including independent verification of equipment compatibility with a CARB or EPA-verified VDECS, and documentation of equipment that has received an exemption from LAWA. Sixteen (16) pieces of diesel equipment were equipped with a diesel emission reduction system: seven (7) pieces of diesel equipment were equipped with Level 3 diesel particulate filters; five (5) vehicles were equipped with the Caterpillar ACERT low emission engine technology; and four (4) vehicles were equipped with low-emission engines operating on compressed natural gas (CNG).
- Major construction work continues on the Tom Bradley International Terminal Project, with Central Core and South Concourse construction scheduled for completion in May 2013. To date, the Third Party Monitor has independently reviewed 284 pieces of equipment. Eight (8) pieces of diesel construction equipment are equipped with a Level 3 diesel particulate filter. Seven (7)

additional pieces of diesel off-road construction equipment were identified as being compatible with a Level 3 particulate filter; LAWA project management directed the construction company to retrofit these vehicles prior to deployment on the airfield.

- The American Airlines Lowboy Hangar Demolition Project commenced deconstruction in August 2012. Deconstruction activities are scheduled to be substantially complete as of December 31, 2012. Forty-five (45) pieces of construction equipment were submitted for independent review. One piece of equipment was granted a driver visibility exemption on the basis of safety concerns; four pieces of equipment were granted an on-road vehicle exemption. The remaining 40 pieces of equipment were submitted under the "20-day" exemption provision of the CBA Section X.F.4.
- Off-road diesel equipment operating on the Taxiway S, Tom Bradley International Terminal, and American Airlines Hangar Demolition Projects whose engines were determined to be compatible with a Level 3 VDECS, but not retrofitted with the best available emissions control technology, were documented to ensure that the equipment had been granted an exemption in accordance with Section X.F.4.

X.F.2 - Demonstration Projects

Notwithstanding the verification or certification requirement set forth in Section X.F.1, LAWA may allow diesel equipment used for construction related to the LAX Master Plan Program to be outfitted with a new emission control device designated by LAWA as a "Demonstration Project", even if the device has not yet been verified or certified by CARB or EPA for use in on-road or off-road vehicle or engine applications. These devices shall, at a minimum, meet all pollution reduction requirements specified in Section X.F.3.

Status → In Progress:

Not required at this time. The Independent Third Party Monitor is available to assist LAWA and the LAX Coalition in identifying potential opportunities to conduct a Demonstration Project in accordance with Section X.F.2. No Demonstration Projects were initiated during 2012.

Section X.F.3 - Emission Reduction Standards

Emission control devices used pursuant to Section X.F.1 shall achieve emission reductions no less than what would be achieved by a Level 2 (50 percent particulate matter reduction) diesel emission control strategy for a similar sized engine as defined by CARB regulations. Under no circumstances shall an emission reduction device or strategy used on the LAX Master Plan Program construction site increase the emission of any pollutant above that which is the standard for that engine.

Status \rightarrow In Progress:

The Independent Third Party Monitor assessed each piece of diesel construction equipment equipped with a VDECS pursuant to Section X.F.1 and documented its compliance as it related to meeting or exceeding Level 2 diesel emission reductions.

Final findings for this Section are as follows:

- With respect to Taxiway S, Tom Bradley International Terminal, and American Airlines Hangar Demolition construction activities during 2012, fifteen (15) pieces of diesel construction equipment were equipped with VDECS. The primary VDECS used on the retrofitted equipment is the HUSS FS-MK diesel particulate filter, verified at Level 3 (greater than 85 percent particulate matter reduction). No Level 1 or Level 2 VDECS were identified for equipment assessed pursuant to Section X.F.1.
- The Third Party Monitor verified with CARB that the Level 3 device utilized on the Taxiway S and the Tom Bradley International Terminal projects did not result in an increase of any pollutant above which is standard for that equipment's engine. No VDECS have been utilized on the American Airlines Hangar Demolition Project to date.

Section X.F.4 – Exemptions

The requirements of Sections X.F.1 through X.F.3 do not apply to a piece of construction related diesel equipment for which the operator provides a written finding, based upon appropriate market research and approved by LAWA, that the best available emission control device for reducing the emissions of pollutants as requires by Sections X.F.1 through X.F.3 is unavailable for that equipment, in which case the contractor shall use whatever technology for reducing exhaust emissions is available and appropriate for that vehicle or engine, if any. In addition, Sections X.F.1 through X.F.3 do not apply to a piece of construction related diesel equipment that is used on LAX Master Plan Program construction sites for fewer than twenty (20) calendar days per calendar year.

Status → In Progress:

The Third Party Monitor reviewed each piece of diesel construction equipment proposed for use on the Taxiway S and BWP as it pertained to the requirements of Sections X.F.1 and X.F.3 and independently determined if a CARB verified or EPA certified diesel emission control system was compatible. These findings were documented and compared with exemptions granted by LAWA. Findings for this Section are as follows:

- Equipment whose engine is compatible with a CARB verified or EPA certified diesel emission control system, but whose use on the Taxiway S, Bradley International Terminal, or American Airlines Hangar Demolition would not exceed twenty (20) calendar days per calendar year was granted a "20-day" exemption by LAWA. The Third Party Monitor maintained an independent database of all equipment operating under the 20-day exemption rule, including the date the equipment was moved onsite and the date the equipment was required to be removed from the airfield;
- The Third Party Monitor reviewed and documented cases where it was determined that the VDECS would impair the equipment operator's field of vision. These vehicles were granted a safety exemption by LAWA. Specific classes of diesel equipment, including motor graders, received an exemption from LAWA on the basis of safety. The Independent Third Party Monitor reviewed and documented each piece of diesel construction equipment that received a safety exemption;
- Exemptions were also granted by LAWA for diesel equipment equipped with small displacement engines and horsepower (hp) ratings less than 50 hp; this

included light towers and air compressors. In addition, on-road vehicles licensed under the Department of Motor Vehicles were granted an on-road vehicle exemption.

• The Third Party Monitor also independently assessed and documented diesel equipment for which no CARB verified or EPA certified diesel emission control system was available. This equipment was granted an exemption by LAWA on the basis of unavailability.

Section X.F.5 - Ultra-Low Sulfur Diesel and Other Fuels

All diesel equipment used for construction related to the LAX Master Plan Program shall use only Ultra-Low Sulfur Diesel Fuel (ULSD) with a sulfur content of fifteen (15) parts per million or lower. If adequate supplies of ULSD are not available in the Southern California area, other fuels may be used, provided that the other fuels do not result in greater emissions of fine particulate matter or oxides of nitrogen that that which would be produced by the use of ULSD.

Status \rightarrow In Progress:

The Third Party Monitor independently reviews and documents fuel purchase records for diesel fuel used on the Taxiway S and BWP. Findings for this Section are as follows:

- South Coast AQMD Rule 431.2, which took effect on June 1, 2006, requires diesel fuel refined and sold for on-road and off-road use within the jurisdiction of the AQMD to contain no more than 15 parts per million (ppm) sulfur by weight. This requirement was subsequently adopted on a statewide basis by the California Air Resources Board, effective September 1, 2006. Thus, ULSD is the only diesel fuel legally available for purchase within California;
- No shortage of ULSD was experienced within Southern California during Taxiway S, Bradley International Terminal, or American Airlines Hangar Demolition construction activities in 2012. No substitution of any fuel in lieu of 15 ppm ULSD occurred during any LAX Master Plan construction project;
- The Third Party Monitor reviewed fuel purchase records as provided by LAWA on behalf of the construction firms. No exceptions to the requirements of Section X.F.5 were documented;
- The Independent Third Party did not monitor on-road vehicles operating on the Taxiway S, Bradley International Terminal, or American Airlines Hangar Demolition projects that were fueled off-site. Fuel purchase records were only provided for vehicles that were fueled on the airfield using mobile refueling trucks.

Section X.F.6 - Operational Requirements

Operational Requirements pertaining to excessive vehicle idling and required engine maintenance intervals shall be issued by LAWA and enforced.

Status \rightarrow In Progress:

The Third Party Monitor monitored excessive vehicle idling enforcement and compliance with engine maintenance intervals based on independent observation, review of

enforcement action documentation, and review of construction firm engine maintenance procedures and records.

Findings as it relates to this Section are as follows:

- No written violations pertaining to excessive equipment idling were cited by LAWA on any construction firm. On infrequent occasions, vehicles deemed to be idling beyond the period of time stipulated in CARB regulations were instructed to turn off their engines. Formal enforcement actions were not deemed necessary by LAWA;
- Each construction firm proposing a piece of diesel equipment was required to submit in writing the scheduled maintenance procedures for that piece of equipment. The Third Party Monitor has reviewed each maintenance plan submitted to LAWA.

Section X.F.7 – Enforcement by LAWA

Compliance with all requirements delineated in Sections X.F. is required of all Airport Contractors, Airport Lessees, and Airport Licensees. LAWA shall enforce the findings and determinations of the Independent Third Party Monitor.

Status \rightarrow In Progress:

No formal enforcement actions were taken by LAWA in 2012 as it pertains to Taxiway S, Bradley International Terminal, and American Airlines Hangar Demolition construction activities. One informal public complaint was received by LAWA pertaining to construction noise that could be heard in the existing Bradley Terminal building. The construction contractor mitigated this issue by voluntarily scheduling high noise activities, such as jackhammering, to occur only during low traveler volume periods.

Section X.F.8 – Independent Third Party Monitor

Compliance with requirements of Section X.F. is required to be monitored, documented, and reported by an Independent Third Party Monitor.

Status → In Progress:

LAWA retained an Independent Third Party Monitor. The findings of the Independent Third Party Monitor are reported in this document and in Appendix B.

Section X.F.9 – Reassessments of Emission Control Devices

"LAWA shall designate the best available emission control devices annually or more frequently, in consultation with the Coalition Representative and the Independent Third Party Monitor. LAWA, in consultation with the Coalition Representative, shall establish processes to revise these designations and incorporate the requirement to use the emission control devices newly designated as best available into construction bid documents to take into account advances in emission control devices prior to bidding of new construction phases of the LAX Master Plan Program. The process of emission control technology review shall include any new relevant requirements promulgated by CARB or EPA. Results from the reassessments shall not be applied retroactively."

Status → In Progress:

The Independent Third Party Monitor reviewed each piece of diesel construction equipment proposed for use on the Taxiway S, Bradley International Terminal, and American Airlines Hangar Demolition projects for compatibility with newly verified Level 2 and 3 VDECS. While it was understood that the requirement to utilize new VDECS could not be applied retroactively for equipment operating on the Taxiway S, Bradley Terminal, and American Airlines Hangar projects, the reassessment process and findings will be used to designate best available control emission devices for subsequent LAX Master Plan Program construction projects.

Section X. G. Ground Service Equipment Diesel Emissions Reduction Incentive Program

"GSE Incentive Program. LAWA shall create a program providing incentives for the reduction of GSE diesel emissions ("GSE Incentive Program"). LAWA shall expend at least \$500,000 on the GSE Incentive Program. Participation by GSE operators in the GSE Incentive Program shall be voluntary. Funding for the program shall commence in fiscal year 2005-06."

Status → In Progress:

In 2012, LAWA organized the approach, defined new tasks, and wrote a scope of work to update the 2007 LAX GSE inventory and conduct a comprehensive e-GSE feasibility study. The specific guidance for the incentive program will be based on the revised GSE Inventory planned for 2013.

Section X. H. Ground Service Equipment Inventory

- "1. Scope of GSE Inventory. LAWA shall prepare a study ("GSE Inventory") detailing all GSE operated On-Site. The GSE Inventory shall include, but not be limited to, an inventory of the number, type, sizes, model year, usage history, and identify of operator for all GSE operated On-Site at the time of the GSE Inventory...
- 2. Determination of 1997 GSE Fleet for Nonparticipating GSE Operators. The GSE Inventory shall include a determination of the number and types of On-Site GSE that were operated On-Site in 1997 by each Nonparticipating GSE Operator..."

Status → Completed:

The study was completed and the results were issued to the Coalition in May of 2007. In 2012, LAWA organized the approach, defined new tasks, and wrote a scope of work to update the LAX GSE inventory and conduct a comprehensive e-GSE feasibility study in 2013.

Section X.I. Requirements for Emissions Reductions by Nonparticipating GSE

"In order to achieve emission reductions from GSE operated at LAX by Nonparticipating GSE Operators, LAWA shall issue requirements leading to the use of less-polluting GSE by Nonparticipating GSE Operators, as described in this Section X.I. New, amended, renewed, or extended Airport Contracts, lease agreements, and any relevant LAX licensing or permitting requirements for Nonparticipating GSE Operators shall include language requiring compliance with requirements of this Section X.I. and allowing

assessment of liquidated damages as described in this Section X.I against any entity responsible for a violation..."

Status → In Progress:

In 2012, LAWA organized the approach, defined new tasks, and wrote a scope of work to update the LAX GSE inventory and conduct a comprehensive e-GSE feasibility study in 2013. In compliance with this section, LAWA is evaluating strategies and options for GSE emission reductions in conjunction with airlines as part of the 2013 study.

Section X.J. Emission Reductions from On-Road Trucks, Buses, and Shuttles

- "1. Inventory of On-Road Heavy-Duty Vehicle Traffic and Study of Feasible Mitigation
 - a. Heavy-Duty Vehicle Study. LAWA shall fund a study of on-road Heavy-Duty Vehicle traffic related to LAX Operations. This study shall begin no later than one year from the effective date of this Agreement. The study shall be completed within twelve months of its initiation. The Study shall be conducted by an Independent Expert, selected through a Contract Award Process..."

Status \rightarrow In Progress:

A draft scope for this study was submitted to the Coalition in July 2005.

- "2. Conversion of Truck, Shuttles, Passengers, Vans and Buses to Alternative Fuel
 - a. Covered Vehicles. Requirements established under this Section X.J.2 shall apply to all on-road vehicles, including trucks, shuttles, passenger vans, and buses, that are 8,500 lbs gross vehicle weight rating or more and are used in operations related to LAX ("Covered Vehicles"). Diesel equipment for construction related to the LAX Master Plan Program that is subject to Section X.F. of this Agreement shall be exempt from requirements established pursuant to this Section X.J.2.
 - b. Conversion Schedule. LAWA shall ensure that by five years from the effective date of this Agreement, 50 percent of the Covered Vehicles operated by any Airport Contractor, Airport Lessee, and Airport Licensee (collectively "Operators") are Alternative-Fuel Vehicles or Optional Low NOx Standard Vehicles. LAWA shall ensure that by ten years from the date of execution of this Agreement, 100 percent of the Covered Vehicles operated by each Operator are Alternative-Fuel Vehicles or Optional Low NOx Standard Vehicles.
 - c. Least-Polluting Available Vehicles. In cases where Operators cannot comply with requirements established pursuant to Section X.J.2.b because neither Alternative-Fuel Vehicles nor Optional Low NOx Standard Vehicles are commercially available for performance of particular tasks, LAWA shall instead require Operators to use Least-Polluting Available Vehicles for such tasks. An Independent Third Party Monitor shall determine on an annual basis whether Alternative-Fuel Vehicles or Optional Low NOx Standard Vehicles are commercially available to perform particular tasks, and, in cases where Alternative-Fuel Vehicles or Optional Low Standard Vehicles are not commercially available for performance of a particular

task, shall identify the Least Polluting Available Vehicles for performance of that task."

Status → In Progress:

LAWA has an Alternative Fuel Vehicle Requirement Program that applies to all on-road vehicles with a gross vehicle weight rating of 8,500 pounds or greater. This program is currently in effect and requires the conversion of rental car shuttles, trucks, and other large vehicles in use at LAX.

LAWA has taken a leadership role to meet this commitment and has met the mid-way milestone for vehicles over 8,500 pounds. The entire LAX fleet is 57 percent alternative fuel. One hundred percent (100%) of the LAX courtesy shuttles are alternative fuel, as are the Americans with Disability Act (ADA) shuttles.

The rental car companies report that about 95percent of the LAX rental car shuttle fleet are fueled by compressed natural gas or have diesel particulate traps.

LAWA began developing a LAX Alternative Fuel Vehicle database to better track and monitor compliance with the requirement. LAWA also began developing an online submittal form for operators and tenants to enter vehicles to report compliance with the requirement.

Section X.K. Particulate Matter (PM 2.5)

- "1. Assessment of PM 2.5. LAWA shall assess and mitigate impacts of PM 2.5 in compliance with all applicable provisions of state and federal law. LAWA's obligation to mitigate PM 2.5 impacts within the context of the CEQA may be limited by feasibility, overriding considerations or other requirements articulated in applicable state and federal laws.
- Determination of PM 2.5 Significance Thresholds. The assessment and mitigation of PM 2.5 impacts shall comply with the requirements for both attainment of PM 2.5 ambient air quality standards and the mitigation of significant project-related and cumulative impacts under CEQA.
- 3. Conferring with Applicable Agencies. LAWA shall confer with applicable agencies, including SCAQMD, CARB, and the EPA, to assure compliance with state and federal PM 2.5 ambient air quality standards after guidance for measuring and evaluating exceedances has been established. With respect to projects requiring CEQA analysis, LAWA shall include the SCAQMD as a responsible agency in the review process to seek adherence to the threshold standards to be established.
- 4. LAWA Project Assessment of PM 2.5. LAWA shall conduct and complete a CEQA assessment of PM 2.5 impacts related to the first LAX Master Plan Program project to be initiated after establishment of applicable thresholds, either by SCAQMD or as outlined above. This assessment shall be completed in consultation with SCAQMD as a responsible agency in the CEQA review process."

Status → Completed:

In 2008, LAWA initiated the environmental analysis of the Crossfield Taxiway Project (CFTP) and published a Draft Environmental Impact Report (EIR) on September 25,

2008. The Draft EIR included an assessment of PM 2.5 impacts in its air quality analysis. Note: This requirement was not considered to apply to the SAIP based on the fact that the CEQA analysis for that project was already well underway before the CBA took effect (i.e., SAIP EIR NOP was published in August 2004, while CBA was not executed until February 2005).

Section X.L. Rock-Crushing Operations and Construction Material Stockpiles

"LAWA shall locate rock-crushing operations and construction material stockpiles for all construction related to the LAX Master Plan Program in areas away from LAX-adjacent residents to reduce impacts from emissions of fugitive dust..."

Status \rightarrow In Progress:

Subject requirement was included in construction specifications of the Bradley West Project (BWP) and Taxilane S, and the rock-crushing plant for these projects complied with this requirement. This requirement is included in construction specifications for all upcoming projects at LAX to the extent that a plant could be accommodated on site.

Section X.M. Limits on Diesel Idling

"LAWA shall prohibit diesel-powered vehicles from idling or queuing for more than ten consecutive minutes On-Site, unless CARB adopts a stricter standard, in which case LAWA shall enforce that standard. Exemptions to this rule may be granted for safetyrelated and operational reasons, as defined in CARB regulations."

Status → Completed:

Subject requirement was included in construction specifications for the CFTP and BWP and was monitored by LAWA's Independent Third Party Monitor. This requirement will be included in construction specifications for all upcoming projects at LAX.

Section X.N. Provision of Alternative Fuel

"LAWA shall ensure that its infrastructure for providing fuel to Alternative-Fuel Vehicles is sufficient and available, where not Operationally Infeasible and/or Technically Infeasible, to meet all requests for alternative fuel from contractors and other uses of LAX."

Status \rightarrow In Progress:

LAWA has a liquefied natural gas (LNG)/compressed natural gas (CNG) facility located on airport property to service LAWA vehicles. There is also a public retail station owned and operated by Clean Energy on the southeast corner of Aviation Boulevard and 104th Street that sells CNG and hydrogen fuels.

Clean Energy is currently building a second CNG station at 9601 Aviation Boulevard, one block north of Century Boulevard that is scheduled for completion in early 2013. The new station is a \$3 million private-sector investment. Clean Energy will own and operate the station under a long-term property lease with Hertz. Clean Energy reported that when complete, the new CNG station will be the largest capacity public-access CNG station in the U.S and will be capable of fueling up to six full-size transit buses or 10 light-duty vehicles, simultaneously. This new station will have better lighting and faster fueling. It is estimated that the fuel flow of the new dispensers will be twice as fast as those at existing stations. The combined CNG capacity for both Clean Energy stations will be 3,500+ gallons per hour.

In addition, LAWA is working with the Los Angeles Department of Water and Power to procure 14 electric vehicle chargers for LAX's long-term parking, Lot C... The entire project is expected to be completed in the first quarter of 2014.

Section X.O. Hydrogen Fuel Cell Infrastructure

"LAWA shall support efforts to place a hydrogen fuel cell system for the generation of electricity at or near LAX. This fuel cell system shall meet or exceed CARB 2007 distributed generation certification standard."

Status → Completed:

LAWA investigated the use of hydrogen fuel cells for the Central Utility Plant Replacement Project (CUP-RP) Environmental Impact Report. The use of hydrogen fuel cells would not be feasible due to size constraints and energy inefficiency.

Section X.P. Cleaner Burning Jet Fuels

"LAWA shall support efforts to encourage the airlines and petroleum industries to embark on a study to promote the use of jet fuels that minimize air pollutant emissions from jet engines."

Status \rightarrow In Progress:

The Airport Cooperative Research Program (ACRP) is a research program that is managed by the Transportation Research Board (TRB) and sponsored by the FAA. The ACRP researches and develops near-term, practical solutions to problems faced by airport operators. In 2012, LAWA's Executive Director, Gina Marie Lindsey, served as a member of the ACRP's Oversight Committee to develop a guidebook for airports to introduce and market alternative fuels, including alternative jet fuels, to the airport community that includes tenants and off-airport consumers. ACRP Report 83: Assessing Opportunities for Alternative Fuel Distribution Programs, was completed in December 2012. The report/guidebook can be downloaded from the following link: http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_083.pdf.

Also in 2012, the Federal Aviation Administration (FAA) announced its plans to form a Center of Excellence (COE) for Environment and Energy in 2013 with the aim of conducting a broad range of study areas including aircraft noise and emissions, environmental policy and alternative jet fuels research. The Center of Excellence will be comprised of a team assembled from across the country to fully address the environmental and energy challenges confronting aviation. To further support research and development of alternative jet fuels, LAWA has agreed to participate as an Industry Affiliate for the University of Kansas and University of California, Los Angeles (UCLA) in the Air Transportation Center of Excellence for Alternative Jet Fuels and Environment.

XI. Green Building Principles

The Agreement states in part:

"To the extent practical and feasible, in accordance with local building codes and California state codes, and subject to limitation or restrictions in accordance with FAA or Transportation Security Administration standards guidelines, LAWA shall incorporate Leadership in Energy and Environmental Design (LEED) building standards into demolition, design, construction and operation of all aspects of the LAX Master Program. LAWA shall apply the LEED standards for New Commercial and Major Renovations, Version 2.1, as defined by the U.S. Green Building Council.

LAWA shall abide by all applicable City regulations with respect to energy efficiency, sustainability and green building design."

Status \rightarrow In Progress:

This measure is currently in practice to the extent feasible and practical. The Alaska Board Room Lounge in Terminal 6 was completed on March 20, 2012. The project achieved LEED Gold in September 2012. The ongoing Bradley West Project as well as LAWA's new Central Utility Plant are being designed and constructed to achieve LEED Silver.

Building projects in the City of Los Angeles are subject to the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (Cal Green). Since the LAGBC has replaced LEED in the Los Angeles Municipal Code, LAWA has replaced its Sustainability Planning, Design, and Construction Guidelines with the sustainable construction standards on the mandatory and voluntary tiers defined in the LAGBC. LAWA requires building projects with a Los Angeles Department of Building and Safety (LADBS) permit-valuation over \$200,000 to achieve LAGBC Tier-1 conformance.

XII. Traffic

The Agreement states in part:

- "A. Construction Traffic
 - Designated Routes. LAWA shall designate routes for construction equipment, construction-related vehicles, and trucks participating in construction projects related to the LAX Master Plan Program to access LAX. These route designations shall ensure that such construction equipment, construction-related vehicles, and trucks do not travel (i) on 111th Street between Hawthorne Boulevard and Inglewood Avenue; (ii) on 104th Street between Hawthorne Boulevard and Inglewood Avenue; (iii) on Inglewood Avenue between Century Boulevard and Inglewood Ave....
 - a. Community Response Program. LAWA shall establish a mechanism for members of the public to report instances of non-compliance with designated truck routes....
 - 2. Lennox/405 Interchange. If LAWA participates in construction of an interchange to the 405 Freeway at Lennox Boulevard, LAWA shall consult with the Coalition Representative and impacted residents in developing mitigation measures that shall be included in the project's Environmental Impact Report, to minimize negative impacts such as residential relocations and the demolition of a community center. These mitigation measures shall include pedestrian and bicycle access over or under the 405 Freeway at Lennox Boulevard, to ensure that local residents can safely access both sides of the 405 Freeway at Lennox Boulevard."

Status \rightarrow In Progress:

LAWA, working with the Los Angeles Department of Transportation, designates routes for construction traffic on a project by project basis. LAWA developed a website at <u>http://www.lawa.org/laxdev</u> to provide construction information for the public. The general, program-wide construction hotline number to report incidences of noncompliance is (310) 649-LAWA (5292).
XIII. Minority Business Enterprise, Women Business Enterprise, and Small Business Utilization and Retention Program

The Agreement states in part:

"A. LAWA shall coordinate with the Mayor's Office, CDD, and other relevant business advocacy and assistance organizations to initiate a program to increase participation in the planning, construction, operation and maintenance of LAX by PIA small businesses and minority-owned business enterprises and womenowned business enterprises (MBE/WBE)....."

Status → In Progress:

In collaboration with the Procurement Services Division, the Business Outreach Unit (BOU) conducts a monthly workshop, "How to Do Business With Los Angeles World Airports." The workshop provides the business owner an opportunity to learn about the procurement processes and services available that are available free of charge and with no charge for parking. LAWA presenters are from Purchasing, Public Works/Certification, Bond Assistance Program/Merriwether and Williams Insurance Services, Contract Services/Administrative Requirements, and from the Business and Job Resources/Business Assistance. Business owners are given the opportunity to introduce their company so that the presenters know who is in the audience so that they can direct information on a particular product or service. Annually, attendance at the workshops averages 240 business representatives. Attendance at the monthly workshops averages 20.

The BOU has developed a database, BizConnect, of approximately 6,500 businesses that are seeking to do business with LAWA. This database was developed with the support of LAWA's Information Management and Technology Group, and is maintained by the BJRC staff. Staff periodically requests updated information from the listed businesses so that current information is always available. BizConnect lists the companies' contact, concept, and certification information for distribution internally and externally. The database is accessible to the public at www.lawa.org/bjrc.

The BOU actively participates in LAWA Division's Request for Qualifications, Request for Proposals, and Request for Bids meetings. Announcements on potential procurement opportunities are sent to businesses listed on BizConnect and to other business assistance agencies that LAWA partners with for distribution.

The BOU also participates and supports outreach events by LAWA's Divisions, City Departments, and other public agencies. This past year LAWA conducted or participated in approximately 208 meetings and events. The unit is actively involved with local Chambers and ethnic business organizations in supporting its members and programs through sponsorship, participation or promotion.

XIV. Community Preparedness for Airport-Related Emergency

The Agreement states:

"LAWA shall assist in the coordination and dissemination of appropriate information related to emergency preparedness and response of local law enforcement agencies, emergency response groups (e.g., Red Cross, FEMA), and the local communities in the event of an airport-related emergency."

Status → Ongoing:

Los Angeles World Airports (LAWA) continues to provide effective and well-coordinated response to incidents that may pose a threat to life safety and/or disrupt airport operations. By working closely with its many partner agencies, LAWA strives to proactively put emergency management principles in place to successfully mitigate, prepare, respond to, and recover from large-scale incidents. In 2010, LAWA opened the new LAX Airport Response Coordination Center (ARCC). The ARCC is a 24/7 centralized operations center to serve the LAX airport community during normal operations. The ARCC also includes the Department Operations Center (DOC) that manages special events and emergency incidents at LAX. The ARCC and DOC enhance communication and coordination capabilities during incidents which fosters collaboration with LAWA and its many partner agencies.

XV. Designated Airport Fund

The Agreement states in part:

"Where this Agreement provides that LAWA shall contribute airport revenues to job training funds or air quality funds, LAWA will follow the procedures set forth in the Cooperative Agreement regarding "Alternative Job Training and Air Quality Expenditure."

Status → In Progress:

If an FAA determination, as defined in and pursuant to the procedures set out in the Cooperative Agreement, or any other regulatory authority prohibits LAWA from taking actions required by the CBA Sections V, VII, VIII, IX, X, or threatens to withhold federal funding if LAWA takes actions required by the referenced sections, then LAWA will set aside funds to the Job Training and Air Quality Funds to the extent allowed.

XVI. Miscellaneous

The Agreement states in part:

- "A. Implementation Meetings. To facilitate implementation of this Agreement, address concerns, and ensures an ongoing dialogue between the Coalition Representative and LAWA, the Coalition Representative and LAWA shall have regular Implementation Meetings....
- B. Annual Reports. LAWA shall prepare annual reports on the implementation of this Agreement and the progress of the LAX Master Plan Program, and shall forward these reports to the Coalition Representative and post the reports on the LAWA website for at least a one-month period....
- C. Contract Award Process. Where a provision of this Agreement refers to a Contract Award Process, that process shall be as described in this Section XVI.C. A Contract Award Process is "initiated" on the date the draft protocols and/or scope of work to be included in the RFP are provided to the Coalition Representative..."
- D. Special Arbitrator.
- E. General LAWA Enforcement Responsibility..."

Status \rightarrow In Progress:

Implementation meetings are regularly scheduled with the Coalition. LAWA prepares annual reports on the implementation of the CBA and the progress of the LAX Master Plan Program.

4.0 Lennox School District – Sound Attenuation Measure

The Agreement states in part:

"LAWA Funding of Certain District Mitigation Measures. Subject to FAA Determination regarding the use of airport funds under the federal anti-revenue diversion laws, LAWA will fund certain mitigation measures for the District not to exceed \$111,000,000 for noise abatement. Mitigation measures include replacement of HVAC equipment with pollution abatement, double-paned windows and/or sound reduction windows and doors, roofing upgrades, replacement of relocatable classrooms, and temporary housing during construction.

Security-Related Items. LAWA will assist the District in the coordination and dissemination of appropriate information related to emergency preparedness and response of local law enforcement agencies, emergency response groups (e.g., Red Cross, Federal Emergency Management Agency) and the local communities in the event of an airport-related emergency.

Community Programs. LAWA will work collaboratively with the District to support a variety of community programs, such as job training and academic programs; and..."

Status → In Progress:

On December 7, 2005, LAWA and Lennox School District submitted a request to the FAA for an advisory opinion on the use of airport revenues for noise mitigation measures at Whelan School. In their response on January 12, 2006, the FAA raised questions and issues regarding the Los Angeles County Superior Courts' April 8, 1976 Judgment and Final Order.

On October 2, 2008, Public Law 110-337 authorized the Secretary of Transportation to expand the use of passenger facility fees for the purpose of carrying out certain noise mitigation at Lennox and Inglewood Unified School Districts.

In July 2009, LAWA submitted a letter to the FAA on behalf of LSD asking that the Secretary of Transportation make a determination, based on Public Law 110-337, that certain schools in LSD are adversely affected by airport noise, and thereby would be eligible for PFC funding for noise mitigation. Subsequently, the FAA indicated to LAWA that this determination will be made as part of the PFC application process.

On January 10, 2011, the BOAC authorized LAWA to submit the PFC application to the FAA for authorization to collect and use PFC funds to sound insulate impacted schools in the LSD, with the application submitted to FAA on February 2, 2011.

On May 2, 2011 the FAA issued the Final Agency Decision finding the schools in LSD to be "significantly impacted and adversely affected by aircraft noise," and authorized the expenditure of up to \$34,089,058 in PFC funds to insulate the schools listed in the Settlement Agreement between LAWA and LSD.

On September 19, 2011, the BOAC approved the Letter of Agreement between LAWA and LSD, and authorized the release of \$10 million to LSD for the first year of the sound insulation program. The funds were delivered to LSD on December 12, 2011. A new

school, Dolores Huerta Elementary School, was completed in 2011, and later in 2011 LAWA provided LSD with an additional \$1,214,600 for sound insulation of this school.

During 2012, LSD contracted work related to those schools listed in their Year One Work Plan, including Animo Leadership High School, Felton Elementary School, Lennox Middle School, Jefferson Elementary School and new construction north of Jefferson Elementary School. Progress has been made on all of these projects, including the completion, in September 2012, of the new Amino Leadership High School.

Work related to the other schools listed in the Year One Work Plan is still in progress.

5.0 Inglewood School District – Sound Attenuation Measure

The Agreement states in part:

"LAWA Funding of Certain District Mitigation Measures. Subject to FAA Determination regarding the use of airport funds under the federal anti-revenue diversion laws, LAWA will fund certain mitigation measures for the District not to exceed \$118,500,000 for noise abatement. Mitigation measures include replacement of HVAC equipment with pollution abatement, double-paned windows and/or sound reduction windows and doors, roofing upgrades, replacement of relocatable classrooms, and temporary housing during construction.

Security-Related Items. LAWA will assist the District in the coordination and dissemination of appropriate information related to emergency preparedness and response of local law enforcement agencies, emergency response groups (e.g., Red Cross, Federal Emergency Management Agency) and the local communities in the event of an airport-related emergency.

Community Programs. LAWA will work collaboratively with the District to support a variety of community programs, such as job training and academic programs; and..."

Status → In Progress:

On October 2, 2008, Public Law 110-337 authorized the Secretary of Transportation to expand the use of passenger facility fees for the purpose of carrying out certain noise mitigation at Inglewood Unified and Lennox School Districts.

Per communications with the FAA related to Lennox School District in 2005 and again in 2009, eligibility for funding projects listed under this Settlement Agreement with Inglewood Unified School District (IUSD) will be made by the FAA through the PFC application process. Further details related to these communications with the FAA are described in Section 4.0.

LAWA continues working with IUSD and FAA to complete the PFC application for submittal to FAA requesting authorization to impose and use PFC funding for sound insulation of impacted schools in IUSD. It is anticipated that the application will be submitted to BOAC and FAA during calendar year 2013.

6.0 Summary

To date, LAWA continues to implement applicable provisions from the Community Benefits Agreement. Construction-related provisions were included in the Taxiway S, Bradley West, and American Airlines Hangar Demolition projects using contract specifications and are being implemented during construction. These provisions are also being incorporated into all ongoing Master Plan projects at this time. Working together with the Coalition, LAWA continues to monitor and implement the required provisions as the LAX Master Plan Program moves forward.

APPENDIX A

UPDATED NOISE MITIGATION PROGRAM AND SCHEDULE

December 2012

LAX Residential Soundproofing Program

Background



Los Angeles World Airport's (LAWA) Residential Soundproofing Program (RSP) was established in 1997 to implement the LAX Aircraft Noise Mitigation Program by soundproofing dwelling units in noise-impacted areas in the City of Los Angeles. The program covers approximately 9,400 residential units in areas of the City of Los Angeles, around LAX, with a recorded Community Noise Equivalent Level (CNEL) of 65 decibels (dB) and higher, as shown on the map produced by LAWA for the fourth quarter of 1992. This number includes 1,200 resulting from the Community Benefits Agreement calling for the soundproofing of properties within the same block of a previously impacted parcel. These 9,400 homes are located in Playa del Rey, Westchester and areas of South Los Angeles. The RSP is strictly voluntary and will not incur any cost to the property owner.

Typical examples of soundproofing include replacing or modifying loose-fitting doors and windows with acoustically rated doors and windows, adding insulation to attics, upgrading the air ventilation system, and fitting chimneys and vents with dampers and/or acoustic louvers. Residences located east of the San Diego Freeway also receive a central air conditioning system in lieu of the ventilation system.

At this time, soundproofing is not offered to new participants. LAWA understands there may be some homeowners who feel that their homes are impacted by aircraft noise; however due to the possible contour changes as a result of current or upcoming projects, additional soundproofing may take place when a newer noise impact contour map is established.

The construction portion of the program is on track to be completed by the end of 2013 at a cost of about \$160 million. This Soundproofing Program is fully funded by Passenger Facility Charges (PFCs).

Program Status

As of December 2012, of the approximately 9,400 originally eligible units, 7,090 have been soundproofed or are currently undergoing soundproofing. Additionally, contracts have been awarded for the last 239 dwelling units which will undergo construction during 2013. Furthermore, 722 units are no longer eligible due to new construction, vacant parcels, business use, or prior easements. Owners of 271 units opted-out of the program, and approximately 1,078 remained unresponsive after numerous contacts and/or certified mailings.

To date, there have been 135 construction contracts awarded, totaling approximately \$135 million, in construction costs alone.

Project Budget: \$160 million Project Completion Date: 2013

Project Spent to date: \$150 million Project Percent complete: 94%

PROJECT COMPLETION PLAN

On April 2010 LAWA notified (via certified mail) all non-responsive homeowners of the program completion and informed them of a deadline to sign up by June 1, 2010. LAWA anticipates construction will be completed by 2013 for those homeowners who signed installation agreements in a timely manner.

APPENDIX B

THIRD PARTY MONITOR SEMI-ANNUAL REPORT DATED DECEMBER 31, 2012



LAX Master Plan Projects Semiannual Report Independent Third Party Monitor

Prepared by:



Clean Fuel Connection, Inc.

January 15, 2013

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SECTION 1 - INTRODUCTION

This Semiannual Report was prepared by Clean Fuel Connection Inc. (CFCI), Independent Third Party Monitor for LAX Master Plan Projects, and is submitted in accordance with Section X.F.8 of the Community Benefits Agreement (CBA)¹. The purpose is to document CFCI's efforts as they relate to the monitoring of LAX Master Plan construction activities and construction contractor conformance to all requirements incorporated in CBA Section X.F.

This Semiannual Report discusses findings of the Third Party Monitor relative to two (2) LAX Master Plan projects that were undergoing construction during the period commencing July 1, 2012 and ending December 31, 2012. These projects include the Tom Bradley International Terminal (formerly referred to as the Bradley West Project), and the American Airlines Lowboy Hangar Demolition project.

CFCI's efforts to date in monitoring, documenting, and reporting on the status of CBA Section X.F as it pertains to LAX Master Plan projects include:

- Development of an Equipment database to include all known equipment utilized in each Master Plan Project. This database documents the technical specifications of each piece of on and off-road construction equipment. The database documents each piece of equipment relative to compatibility with diesel emission control devices, the emission control device used or planned for use on each piece of construction equipment, or whether the equipment was determined to be incompatible with any available emission control system. The database also documents all equipment operating under an approved LAWA exemption, including but not limited to "20-day" exemptions, driver-visibility safety exemptions, or special circumstance exemptions;
- Field verification of the equipment database and reconciliation with LAWA project management vehicle records. The construction contractors provide LAWA project management with airfield equipment lists on a periodic basis (typically monthly). The Third Party Monitor reviews all available vehicle records for the purpose of verifying compliance with 20-day exemption obligations as well as reconciling LAWA project management records with the Third Party Monitor equipment database;
- Examination and verification of requests for exemptions from installation of Best Available
 Control Technology (BACT). As discussed in Section 2 of this Report, CFCI independently

¹ <u>http://www.ourlax.org/comBenefits.cfm</u>



reviews each piece of construction equipment proposed for use on a LAX Master Plan Project to determine compatibility with a commercially available California Air Resources Board (CARB) or U.S. Environmental Protection Agency (EPA) verified Diesel Emission Control System (VDECS). The results of this independent assessment are documented in each Semiannual Report as well as the equipment database;

- Examination of fuel purchase records to verify that low sulfur diesel is being used.
- Monitoring of installed emission control devices on construction equipment. This includes
 physical inspections of diesel construction equipment retrofitted with a VDECS to ensure
 emission control devices are properly installed and functioning;
- On-airfield monitoring of construction equipment operations enforcement. This includes, but is not limited to, observation of construction operations to determine compliance with equipment idling restrictions, fugitive dust emissions mitigation requirements, as well as identification of construction equipment in an apparent state of disrepair due to the presence of visible smoke;
- Annual Reassessment of Available Emission Control Systems. On an annual basis, the Third Party Monitor conducts a comprehensive evaluation of available CARB and EPA-verified emission control systems. The purpose of this reassessment is to ensure LAWA incorporates the any newly designated best available control strategies into construction bid documents prior to bidding of new construction phases of the LAX Master Plan Program. The process of emission control technology review also includes any new, relevant requirements promulgated by CARB or EPA. This Semiannual Report includes the results of the Annual Emission Control System Reassessment.

The CFCI project staff is comprised of the following individuals:

- Enid Joffe, founder and owner of Clean Fuel Connection, Inc.;
- Ray Gorski, lead air quality engineer and principal field engineer;
- Lauren Dunlap, air quality engineer and principal analyst in determining compatibility of emission control devices and calculations of emission reductions for VDECS installed on Master Plan project equipment.



As of December 31, 2012, the Tom Bradley Terminal Project had substantial ongoing interior construction activity, and the American Airlines Hangar Demolition project was in the final stages of facility deconstruction, activity that had commenced in mid-summer 2012.

SECTION 2 - TASK-BY-TASK STATUS REPORT

The following section documents CFCI's work over the past six months on each of the specific tasks in the Third Party Monitor Scope of Work.

Task 1: Best Available Emissions Control Devices Required

Section X.F.1 of the Community Benefits Agreement (CBA) for the LAX Master Plan Program requires that all diesel equipment used for construction be outfitted with the best available emission control devices, primarily to reduce diesel particulate matter on the order of 10 microns² in diameter (PM₁₀), and fine particulate, which is on the order of 2.5 microns in diameter (PM_{2.5}). A secondary objective of this requirement is to reduce oxides of nitrogen emissions (NO_x), which are ozone precursors. Section X.F.1 of the CBA applies the requirement to outfit all diesel equipment, including off-road vehicles such as heavy-duty construction equipment, as well as on-road vehicles such as trucks, street sweepers, etc. The requirement also affects non-mobile diesel sources, such as portable generators, air compressors, and light towers. Thus, the requirement to retrofit diesel equipment used in LAX Master Plan construction projects encompasses every piece of diesel equipment, irrespective of its status as on-road mobile, off-road mobile, or stationary.

Section X.F.1 requires that the diesel emission control systems used to retrofit diesel equipment be verified or certified for use on on-road or off-road vehicles or engines by the California Air Resources Board (CARB), or verified by the U.S. Environmental Protection Agency (EPA) for use on on-road or off-road vehicles or engines. Section X.F.1 further allows CARB and EPA-verified "mobile source" devices to be applied to "stationary sources", such as generator engines, and allows technologies verified for "on-road" engines to be applied to "off-road" equipment. Thus, the overall context of Section X.F.1 is very broad and allows maximum flexibility in matching diesel emission control systems with diesel equipment used in Master Plan construction.

² One micron equals 1×10^{-6} meter or 0.000001 meter.



The role and responsibilities of the Independent Third Party Monitor as it relates to Section X.F.1 of the CBA is delineated in the following contract Task statements:

- Task 1.1 Contractor shall develop a monitoring process and database to track each piece of diesel equipment used for construction, including documentation procedures and reporting requirements;
- Task 1.2 Contractor shall monitor, document, and report independently from LAWA, each construction firm's compliance as it relates to outfitting their diesel construction equipment with the best available emissions control devices available.

The following are the results and findings of the Third Party Monitor as they relate to Tasks 1.1 and 1.2 for the period commencing in July 1, 2012 through December 31, 2012.

Task 1.1 – Monitoring Process, Database Development, and Documentation:

Key elements of the monitoring process include:

- Review of available documentation The principal source of technical information for each vehicle proposed for operation on the Tom Bradley International Terminal and American Airlines hangar demolition projects are the equipment reports submitted by the construction contractors for review by LAWA project management and environmental management staff. These reports document whether or not a compatible verified diesel emission control system (VDECS) is available for a given piece of diesel equipment;
- Incorporation of all available data into an Equipment Database All relevant information derived from review of the equipment reports or field inspections is documented in the equipment database. This database is the principal tool for performing independent verification and validation of the information contained in the equipment reports reviewed and approved by LAWA;
- Identification and documentation of missing, inconsistent, or inaccurate data The database notes which pieces of information are either missing or whose accuracy is suspect;
- Request for Additional Information and/or Clarification Missing data or data that require validation are compiled, and a request for clarification is issued by the Independent Third Party Monitor to LAWA project management staff;



- Field Inspections In specific cases, the Independent Third Party Monitor will request permission to conduct a field inspection of the specific piece of equipment under scrutiny;
- Task 1.2 Independent Verification and Validation For each piece of diesel construction equipment included in the database, an independent determination of whether or not a compatible VDECS device is available is conducted;
- Documentation of Analysis Results For each piece of diesel equipment assessed, the availability and compatibility of a VDECS is recorded in the database;
- Data Reconciliation The Third Party Monitor reconciles information contained in the database with the reports maintained by LAWA project management and the construction manager's staff.

The Database Development element of Task 1.1 was conducted in accordance with a single objective – record as much data and supporting information as possible to fully characterize each piece of equipment proposed for operation on an LAX Master Plan construction project. To ensure completeness the database incorporates the following data fields:

- Equipment ID Number Most equipment operating on an LAX Master Plan construction project is marked with a unique identifying number by the equipment owner. It has been the practice of the Independent Third Party Monitor and LAWA project management staff to use this unique ID when describing, discussing or documenting a specific piece of equipment. All equipment is tracked and monitored relative to this ID number;
- Owner the owner of the piece of diesel equipment, including prime contractor and name of subcontractor or equipment rental company;
- Equipment Category A brief description for the type of diesel equipment, such as "articulated dump truck";
- Equipment Manufacturer The manufacturer of the piece of equipment, usually the equipment chassis. In most cases the manufacturer of the chassis is different from the engine manufacturer;
- Equipment Model Year The year of manufacture of the equipment or vehicle, usually referring to the chassis and vehicle body. It should be noted that it is common for the equipment chassis or body and diesel engine to be different model years;



- Equipment Model Number The number or other descriptive terminology used by the equipment manufacturer in marketing the vehicle, oftentimes used to differentiate similar products;
- Equipment Serial Number This differs from the Equipment ID number described above. The equipment serial number is the vehicle chassis or body identification number assigned by the equipment manufacturer;
- Engine Manufacturer The manufacturer of the main diesel engine used in the equipment. In some cases, most notably off-road heavy-duty scrapers and on-road street sweepers, the equipment has two diesel engines. The first and second engines are designated #1 and #2, respectively, in the database;
- Engine Model The number or other descriptive terminology used by the manufacturer in engine marketing, used to differentiate similar products;
- Engine Model Year The year of manufacture of the diesel engine, diesel emission control devices are often verified for a specific engine model year;
- Engine Serial Number A unique identification number or alphanumeric code assigned by the engine manufacturer;
- Engine Displacement The total volumetric size of the engine's combustion cylinders, usually described as "cubic inches" or "liters". Displacement expressed in cubic inches is calculated by multiplying the number of cylinders by the piston area (square inches) and by the length of the piston stroke (inches). The commonly used metric designation of "liters" is the total engine displaced volume measured in cubic centimeters (1 liter = 1,000 cubic centimeters);
- Engine Horsepower The rated horsepower of the engine by the engine manufacturer;
- Engine Family Engine Family is a descriptive designation given by CARB to a diesel engine upon certification. It is a code, similar to an automobile Vehicle Identification Number, that identifies the engine model year, engine manufacturer, the engine's displacement, on-road or off-road applicability, emissions equipment included during certification testing. This piece of data, along with engine manufacturer and engine model year, is essential to determine conclusively if a VDECS is compatible with the engine undergoing assessment. With practice, one can quickly ascertain a substantial amount of information about an engine by deciphering the engine family designation;



Engine #2 Data – Similar to the above for Engine #1, data are documented for the second diesel engine on a piece of equipment. In the case of heavy-duty earth moving scrapers, the two engines are front and rear; in the case of street sweepers, the second engine is an auxiliary engine that operates the vehicle's rotary brooms and vacuum system.

For each piece of diesel equipment, the database also documents:

- Whether that piece of equipment has or is currently operated on a Master Plan project. For equipment that has been removed, the date of removal is recorded if known. This portion of the database is currently undergoing reconciliation with the results of the airfield equipment inventory.
- For equipment operating under a 20-day exemption, the date the equipment was placed on the airfield and the date removed. For more discussion on 20-day exemption status, please refer to the Task 4 Section of this report;
- Each piece of equipment's compatibility with both off-road and on-road Verified Diesel Emission Control Systems available at the time the equipment was originally submitted by the owner for review by project management staff.

During the period of July 1, 2012 through December 31, 2012, 45 pieces of construction equipment associated with the American Airlines Hangar Demolition Project were assessed. This is in addition to the 284 pieces of construction-related equipment previously assessed and documented in the Equipment Database for the Tom Bradley International Terminal project. Thus, the total number of pieces of diesel construction equipment associated with LAX Master Plan Projects as of December 31, 2012 is 329 pieces.

A sample of the type of data recorded is shown below in Table 1.1-1:

Equipment Number	Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Engine Horsepower	Manufacturer	Engine Model Year	Engine Family
369001	ARB, INC.			Mobile Ram		ABI		
111-004	Malcom Drilling	RG 19 T	C16	Drill Rig	630	Bauer	2004	4CPXL15.8EXK
623-9	Fine Grade Equipment	623F	3406C	Scraper	365	Caterpillar	1996	TCP14.RZDBRJ
140-10	Fine Grade Equipment	140H	3306	Motor Grader	150	Caterpillar	1997	VCP10.RZDARF
14-10	Fine Grade Equipment	14H	3306	Motor Grader	215	Caterpillar	1997	VCP10.RZDARG
160-1	Fine Grade Equipment	160H	3306	Motor Grader	180	Caterpillar	1997	VCP10.RZDARG

Table 1.1-1 – Sample of Equipment Database Fields



3414	Griffith	345 BL	3176C	Excavator	290	Caterpillar	1998	WCPXL10.3ERK
140-12	Fine Grade Equipment	140H	3306	Motor Grader	165	Caterpillar	1998	WCPXL10.5MRF
557	La Londe	D6RXL	3306	Crawler Tractor	175	Caterpillar	1998	WCPXL10.5MRF
140-11	Fine Grade Equipment	140H	3306	Motor Grader	165	Caterpillar	1999	XCPXL10.5MRF

<u>Task 1.2 – Independent Monitoring, Documentation, & Reporting of Compliance with CBA Section X.F.1;</u> <u>Best Available Emission Control Devices</u> Required:

The primary objective of this Task is to independently verify and validate the findings of LAWA project management and contractor staff as it relates to the availability and compatibility of diesel emission control systems for diesel equipment operating on a Master Plan Project. Using the methodology described under Task 1.1, CFCI staff regularly coordinates with LAWA project management, requesting and receiving access to files and records for diesel equipment operating or proposed for operation on a Master Plan project.

Only CARB and/or EPA-verified devices available at the commencement of construction activities on a specific Master Plan project were considered when assessing compliance with CBA Section X.F.1. This is based upon the following language included in the CBA:

- The CBA stipulates in Section X.F.9.a. "Reassessments of Emission Control Devices", that "the process of emission control technology review shall include any new relevant requirements or regulations promulgated by CARB or EPA. Results from the reassessments shall not be applied retroactively";
- CBA Section X.F.9.b. states under "Application of New Requirements", that "any new designations of emission control devices as best available shall apply only to projects that start after the devices are verified or certified for use by CARB or EPA, or approved for use as part of a Demonstration Project".

At the time of commencement of construction activities on Tom Bradley International Terminal, and American Airlines Hangar Demolition projects, multiple diesel emission control devices were verified by CARB for off-road use. CARB assigns a designation to each diesel emission control device as a function of its effectiveness in reducing diesel particulate matter (PM) emissions. This is referred to as the "Verification Level" of the device; CARB currently recognizes three verification levels, as follows:



- Level 1 greater than or equal to 25% reduction of diesel PM;
- Level 2 greater than or equal to 50% reduction in diesel PM;
- Level 3 greater than or equal to 85% reduction in diesel PM.

As shown above, CARB Level 3 offers the highest level of diesel pollution reduction. In accordance with the CBA, the "Best Available Control Technology" (BACT) is Level 3 verification.

Task 1.2 Results

Each of the 329 pieces of diesel equipment submitted for LAWA project management review were independently assessed to determine their compatibility with a CARB and/or EPA-verified diesel emission control system. The following sections discuss conformance with Task 1.2 for each of the three LAX Master Plan projects monitored during the previous six months.

1.2.1 Tom Bradley International Terminal – The project will provide greater capacity to the Tom Bradley International Terminal's (TBIT) west side with the addition of eighteen (18) new boarding gates to accommodate new-generation aircraft such as the Airbus A380. The facility will include expanded passenger waiting areas and a Great Hall with 140,000 square feet of dining, retail shopping, airline club lounges, and other passenger amenities beyond passenger screening.

The project includes upgraded customs and immigration federal inspection areas for more efficient passenger processing, as well as secured corridors between Terminal 3, TBIT and Terminal 4 so connecting passengers can conveniently go from one terminal to the next.









Figure 1.2.2-2: Tom Bradley International Terminal Project Under Construction at LAX

Photo Courtesy of LAWA

During the period of this Semiannual Report, approximately 284 pieces of diesel construction equipment were assessed relative to their compatibility with a verified diesel emission control system. It is important to note that not all of this equipment will be utilized on any LAX Master Plan construction project. The contractor provides a listing of all potential equipment to be utilized during construction activities. Only a subset of the total equipment list is ultimately brought on the airfield. The Third Party Monitor, however, is obligated to assess all equipment submitted, irrespective of whether or not it is actually utilized.

Each piece of diesel equipment with valid data was correlated against a CARB database of over twenty verified diesel emission control strategies – this is detailed in the Equipment Database.

In accordance with CBA Section X.F.1, both off-road and on-road diesel emission reduction technologies were evaluated for compatibility with diesel equipment operating on the Tom Bradley International Terminal Project. The complete results of the analysis are included in the database.

Of the 284 pieces of diesel equipment included in the database, 228 are on-road vehicles granted an exemption by LAWA. One vehicle was granted 20-day exemption status, and 27 due to driver visibility concerns. Eight (8) were found to be incompatible with any CARB or EPA-verified device. It should be



noted that these vehicles are undergoing additional scrutiny to ensure the CARB engine family designation is correctly recorded; any changes will be noted in the next Semiannual Report. However, the majority of equipment operating on the Tom Bradley Terminal Project is technically compatible with a verified diesel emission control system.

BACT Device Installed	8
Identified as Compatible But BACT Device Not Installed	7
Exemption on Basis of Safety	27
"20-Day" Exemption Status	1
Small Displacement Engine Exemption	5
On-Road Vehicle Exemption	228
Identified as Not Compatible with BACT Device	8

Table 1.2.1-1: Status of Tom Bradley Terminal Diesel Equipment as of December 31, 2012

One technical issue was identified that required further investigated by the CFCI staff in cooperation with LAWA project management. In several cases, it appears that the prime construction contractor, or their technical representative, misinterpreted the CARB Executive Order (EO) for the HUSS FS-MK diesel emission control device. Specifically, an incorrect EO was used to determine if the device was verified at the time of initiation of construction activities on the Bradley Terminal Project. Because the construction contractor used the incorrect EO, it appeared that the HUSS FS-MK was not technically available at the start of construction activities. In fact, the device was fully verified and available as a Best Available Control Technology option. This issue is more fully discussed under Task 4, "Exemptions".

It is important to emphasize, however, that compatibility between the equipment's diesel engine and a diesel emission control device is not a definitive conclusion that the equipment can be retrofitted. Task 4 will discuss cases in which the equipment has been exempted from the requirement to be retrofit with a diesel emission control device due to driver visibility concerns. Other factors influence the requirement to retrofit a specific piece of diesel equipment, including whether or not the equipment's engine is equipped with exhaust gas recirculation (EGR, a NOx reduction emission control), or whether the equipment is granted an exemption due to anticipated low usage, i.e., a "20-day" exemption.



As of December 31, 2012, LAWA records and Third Party Monitor documentation review and onsite observations indicate that a total of eight (8) pieces of equipment are equipped with a Level 3 VDECS. The balance of equipment is either operating under an approved exemption category or has a verified diesel emission control system compatibility evaluation pending.

1.2.2 American Airlines Lowboy Hangar Demolition Project – The demolition of the American Airlines Lowboy Hangar commenced in August 2012. Demolition of this facility is necessary to accommodate construction of Taxiway T schedule to begin in the third quarter of 2013.

The demolition of the steel superstructure was primarily accomplished using Caterpillar 345 and 365 model excavators equipped with a "Sputnik" attachment. Water trucks and hoses were used to mitigate dust during demolition, and debris was removed from the airfield by loaders and on-road trucks.



Figure 1.2.2-1: American Airlines Hangar Demolition in Progress – August 13, 2012

Table 1.2.2-1, below, shows the equipment list for the American Airlines hangar demolition project. The prime contractor for hangar demolition is Evans Brothers Inc.



Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Engine Family	Airfield Status	Exemption Status
Evans Brothers Inc.	CAT 349		Excavator		Planned	
Evans Brothers Inc.	CAT 336		Excavator		Planned	
Evans Brothers Inc.	CAT 826		Dozer		Planned	
Evans Brothers Inc.	Case 821		Loader		Planned	
Evans Brothers Inc.	Bomag BW213DH-40		Roller		Planned	
Evans Brothers Inc.	JLG 800S		Boom Lift		Planned	
Evans Brothers Inc.	John Deere 310		Backhoe		Planned	
Evans Brothers Inc.	John Deere 550J		Dozer		Removed	20-Day
Evans Brothers Inc.	Gehl DLH-55		Telehandler		Planned	,
Evans Brothers Inc.	Gehl DLH-55		Telehandler		Planned	
Evans Brothers Inc.	Quinn 420E		Backhoe		Planned	
Evans Brothers Inc.	CAT D4K		Dozer		Planned	
Evans Brothers Inc.	CAT 950H		Loader		Planned	
Evans Brothers Inc.	JLG GT-55A	Q5B4.5	Telehandler	ACEXL0275AAG	Removed	20-Day
Evans Brothers Inc.	CAT 345		Excavator		Onsite	20-Day
Evans Brothers Inc.	CAT 365		Excavator		Onsite	20-Day
Evans Brothers Inc.	Water Truck		Water Truck		Onsite	20-Day
Evans Brothers Inc.	Water Truck		Water Truck		Onsite	20-Day
Evans Brothers Inc.	CAT 246		Skidsteer		Onsite	20-Day
Evans Brothers Inc.	Sweeper		Sweeper		Onsite	20-Day
Evans Brothers Inc.	Potholing Trailer		Potholing Trailer		Removed	20-Day
Evans Brothers Inc.	Roller		54" Roller		Removed	20-Day
Technion	Gradall 534D9-45	4045TF275	Telehandler	4JDXL06.8041	Onsite	20-Day
Technion	John Deere 310	4045DT058	Backhoe	4JDXL04.5043	Onsite	20-Day
Technion	John Deere 410G		Backhoe		Removed	20-Day
Technion	John Deere 710		Backhoe		Onsite	20-Day
Technion	Ford F650	8YL56795	On-road Truck	CPXH04442H	Onsite	On-Road
Technion	Ford F550		On-road Truck		Onsite	On-Road
Technion	Ford F250		On-road Truck		Removed	On-Road
Technion	Liebherr	D846A7	Hydro Crane	6LHAL12.8RMC	TBD	20-Day
Valverde Construction	CAT 328	C7	Excavator	ACPXL07.2ESL	Onsite	20-Day
Valverde Construction	Case 590	4T9390	Backhoe	1XPKXL039AKL	Removed	20-Day
Valverde Construction	Linkbelt 869	C13	Hydro Crane	8CPXH0763E1B	Removed	20-Day
Valverde Construction	John Deere 310J		Backhoe		Onsite	20-Day
Valverde Construction	John Deere 310J		Backhoe		Removed	20-Day
Valverde Construction	CAT 446		Backhoe		Removed	20-Day
Valverde Construction	Hyundai HL7409		Loader		Onsite	20-Day
Valverde Construction	Komatsu PC300		Excavator		Onsite	Driver Visibility
Valverde Construction	Ford F700		Water Truck		Onsite	On-Road
FTC	Terex TX6622	Deutz BF4M	Telehandler		Removed	20-Day
FTC	Putzmeister BSF 20H		Concrete Boom Truck	5MKXHIL.9V67	Removed	20-Day
FTC	Ingersoll Rand VR1056		Telehandler		Removed	20-Day
Tank	JLG GT-55A		Telehandler		Removed	20-Day
Tank	Yanvar 705310		Skidsteer		Removed	20-Day
Link	CAT 6M22		Forklift		Onsite	20-Day

Table 1.2.2-1: Equipment List for American Airlines Lowboy Hangar Demolition Project

As shown in the above table, Evans Brothers Inc. submitted a total of 45 pieces of construction equipment for potential use on the American Airlines hangar demolition project. Of these 45 pieces of equipment, 32 pieces were used during the period from July 1st to December 31st 2012. All equipment that has operated on the hangar demolition project received an exemption from LAWA; one excavator was granted a driver visibility impairment exemption, three pieces of equipment were granted on-road vehicle status, and the balance of equipment utilized operated under a 20 day exemption. Vehicles and



equipment operating under a LAWA exemption are not required to install a BACT device per the CBA. Table 1.2.2-1 also shows which pieces of equipment were removed due to the expiration of their 20-day exemption status.

Task 2: Demonstration Projects

Section X.F.2 of the CBA states that LAWA may allow construction-related diesel equipment to be outfitted with new emission control systems that are not CARB verified or EPA certified for use for onroad or off-road vehicles or engines. Such projects will be designated by LAWA as "Demonstration Projects". The roles and responsibilities of the Independent Third Party Monitor as they relate to Demonstration Projects is set forth in Task 2 of the contract and includes the following two primary subtasks:

- <u>Task 2.1</u> The Third Party Monitor shall perform a technical evaluation of the proposed demonstration technology and provide written findings to the Coalition Representative and LAWA. The Third Party Monitor shall also assist with the implementation of a Demonstration Project, including identifying suitable emission control devices and Demonstration Project funding sources;
- <u>Task 2.2</u> Upon acceptance by LAWA, the Third Party Monitor shall monitor, document, and report independently from LAWA, compliance of the demonstration equipment with all defined Demonstration Project requirements, including but not limited to the pollution reduction requirements specified in Section X.F.3 of the CBA.

No demonstration projects were conducted during the six-month period of July 1st through December 31st 2012.

Task 3: Emission Reduction Standard

Section X.F.1 of the Community Benefits Agreement (CBA) for the LAX Master Plan Program requires that all diesel equipment used for construction be outfitted with the best available emission control devices, primarily to reduce diesel particulate matter which is on the order of 10 microns³ in diameter (PM_{10}), and fine particulate, which is on the order of 2.5 microns in diameter ($PM_{2.5}$). A secondary objective of this requirement is to reduce oxides of nitrogen emissions (NO_x), which are ozone

³ One micron equals 1×10^{-6} meter or 0.000001 meter.



precursors. This section also states that under no circumstance shall an emission reduction device or strategy used on the LAX Master Plan Program construction site increase the emission of any pollutant above that which is the standard for that engine.

The role and responsibilities of the Independent Third Party Monitor as it relates to Section X.F.1 of the CBA is delineated in the following contract Task statements:

- Task 3.1 Contractor shall monitor, document, and report independently from LAWA, compliance of each piece of diesel construction equipment used pursuant to CBA X.F.1. as it relates to meeting or exceeding Level 2 diesel emission reductions for a similar sized engine;
- Task 3.2 Contractor shall monitor, document, and report independently from LAWA, compliance of each piece of diesel construction equipment used pursuant to CBA X.F.1 to ensure its emission reduction device or strategy does not result in an increase of any pollutant above that which is standard for that engine;
- Task 3.3 Contractor shall monitor, document and report on emission reductions of NO_x, ROG, PM and CO achieved through the use of best available control technology.

Task 3.1 - Monitor, document, and report equipment compliance with Level 2 requirement.

As summarized above in Task 1, the Third Party Monitor compiled a database of LAX Master Plan project equipment. This database is continually updated with new information collected from LAWA project management staff on behalf of the construction contractors or visual inspection by CFCI. As part of this inventory, the Task 1 effort included an equipment-by-equipment review for applicability of approved Best Available Control Technologies (BACT). Specifically, the equipment listed in this master database was compared against all available Verified Diesel Emission Control Systems (VDECS), with first priority given to Level 3 diesel emission reductions.

Not all equipment proposed for operation on the Tom Bradley Terminal and American Airlines Hangar Demolition Projects is necessarily used – contractors provide a list of potential needs prior to the start of construction activities. Typically, a subset of this proposed equipment is actually used in construction activities. This was illustrated in Table 1.2.2-1, above. Also, not all equipment resides on the airfield during the entire project duration; equipment is moved on and off the airfield as construction demands dictate.



Task 3.2 – Ensure emission reduction devices/strategy does not result in an increase of any pollutant above that which is standard for that engine.

The U.S. EPA and ARB verification procedures are designed to ensure that no measurable increase on other pollutant emissions results from installation of the approved VDECS. One issue that should be noted is that the ARB verification procedures include a NO₂ limit requirement. Specifically, NO₂ may not increase more than 20 percent as a result of the installation and operation of the device⁴. All VDECS assessed under Task 1 for the Tom Bradley International Terminal comply with the CARB NO₂ limit requirements. No equipment used in American Airlines hangar demolition was equipped with a VDECS.

<u>Task 3.3 – Contractor shall monitor, document and report on emission reductions of NO_x, ROG, PM and</u> CO achieved through the use of best available control technology.

As of December 31, 2012, LAWA was completing compilation of equipment usage (hours of operation) associated with the Tom Bradley Project. Emission reductions for this equipment will be quantified and included in the next Semiannual Report to be published in July 2013.

Task 4: Exemptions

1.4.1 Tom Bradley International Terminal Project

As noted in Section 1.2.1, approximately 261 pieces of diesel equipment were either granted exemptions from being retrofitted with a CARB or EPA verified device. Diesel equipment proposed for operation on the Tom Bradley Terminal Project that has been granted an exemption by LAWA is discussed in the following paragraphs.

Exemptions Granted Due to Unavailability of a Compatible VDECS

Approximately eight (8) pieces of diesel equipment evaluated by the Third Party Monitor were determined to not be compatible with a CARB or EPA-verified diesel emission control device, as shown below in Table 1.4.1-1:

⁴ Title 13 CCR section 2706(a)



Equipment Number	Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Manufacturer	Engine Model Year	Engine Family
105G	Pacific Boring	TAD1353GE		Generator	Volvo	2009	9VPXL12.8BCA
A9	Pacific Boring	TCD914L06		Boring Machine 48" A/Auger	Deutz	2007	7DZXK06.5074
140	Pacific Boring	C7		Grove RT740 Crane	Caterpillar	2008	8CPXL7.2ESL
762	La Londe	710J	6068HT067	Loader Backhoe	John Deere	2009	9JDXL06.8105
VH252	Royal Electric	F250 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
VH256	Royal Electric	F550 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
VH258	Royal Electric	F250 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
C6	Concrete Coring	F550	N/A	On-Road Truck	Ford	2008	BNVXH06.4AGC

Table 1.4.1-1: Diesel Equipment Not Compatible with a Diesel Emission Control Device

The equipment deemed compatible is listed below in Table 1.4.4-2:

Table 1.4.1-2: Equipment Granted Incompatibility Exemption

Equipment Number	Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Manufacturer	Engine Model Year	Engine Family
	King	RS6-42	6,000 lb. Telescoping Forklift	Forklift	Gehl	2006	6JDXL06.8082
GP1	Pacific Boring	V2203		Grout Pump (Strong)	Kabota	2002	YKBXL02.2FCD
GP2	Pacific Boring	BF4L1011F		Grout Pump (Swhing)	Deutz	2003	3DZXL02.7014
GBM	Pacific Boring	4045TF270		Power Motor	John Deere	2005	5JDXL04.45057
GBM PUMP	Pacific Boring	1B30-X		Bentonite Tank	Hutz	2005	4HZXL.347V30
E-141	Savala	ZX300LC	C9	Excavator	Hitachi	2005	5SZXL08.8EXA
E-149	Savala	PC228	SAA6D114E- 2	Excavator	Komatsu	2008	8KLXL0409AAC



20-Day Exemptions

As of December 31st 2011, one piece of diesel construction equipment had been formally granted a 20day exemption, as shown below:

Equipment Number	Equipment Owner	Equipment Model Number	Equipment Category	Engine Horsepower	Manufacturer	Engine Model Year	Engine Family
A8	Pacific Boring	BF4M1013	Boring Machine 48" A/Auger	112	Deutz	2000	YDZXL07.1005

Table 1.4.1-3: Construction Equipment Granted a "20-Day" Exemption

However, it is anticipated that additional specialty equipment will be granted 20-day exemption status during the construction of the Tom Bradley Terminal Project. The Semiannual Report scheduled for publication in July 2013 will document any additional equipment operating under this exemption provision.

Safety Exemptions

Multiple pieces of diesel equipment were exempted from the requirement to install a diesel emission control device due to safety considerations, specifically the potential that the device would impair the equipment operator's line of sight visibility. As discussed in previous sections of this Semiannual Report, motor graders have been granted a categorical exemption based on safety for all LAX Master Plan projects implemented to date. Diesel equipment that has been granted a safety exemption is listed below in Table 1.4.1-4.

Equipment Number	Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Manufacturer	Engine Model Year	Engine Family
623-9	Fine Grade Equipment	623F	3406C	Scraper	Caterpillar	1996	TCP14.RZDBRJ
D6-3	Fine Grade Equipment	D6	3126B	Crawler Tractor	Caterpillar	2004	4CPXL07.2HSK
B-71	Savala	450E	C404/ACERT	Backhoe	Caterpillar	2007	7PKXL04.4NJ1
3575	Griffith	450E	C4.4 ACERT	Backhoe	Caterpillar	2008	8PKXL04.4NJ1
623-10	Fine Grade Equipment	623F	C15	Scraper	Caterpillar	2009	9CXL15.2ESW
L-64	Savala	WA380-5L	SAA6D114E- 2	Wheel Loader	Komatsu	2003	3KLXL0505ABD

Table 1.4.1-4: Diesel Equipment Granted a Safety Exemption



	т т		T	1		1	1
623-5	Fine Grade Equipment	623B	3406	Scraper	Caterpillar	1983	1263NA020
623-8	Fine Grade Equipment	623E	3406	Motor Grader	Caterpillar	1991	1347NA011
623-11	Fine Grade Equipment	623F	3406	Scraper	Caterpillar	1995	1263NA
140-10	Fine Grade Equipment	140H	3306	Motor Grader	Caterpillar	1997	VCP10.RZDARF
14-10	Fine Grade Equipment	14H	3306	Motor Grader	Caterpillar	1997	VCP10.RZDARG
160-1	Fine Grade Equipment	160H	3306	Motor Grader	Caterpillar	1997	VCP10.RZDARG
140-12	Fine Grade Equipment	140H	3306	Motor Grader	Caterpillar	1998	WCPXL10.5MRF
140-11	Fine Grade Equipment	140H	3306	Motor Grader	Caterpillar	1999	XCPXL10.5MRF
479	La Londe	140H	3306	Motor Grader	Caterpillar	2001	1CPXL10.5MRF
14-11	Fine Grade Equipment	14H	3306	Motor Grader	Caterpillar	2001	1CPXL10.5MRG
140-13	Fine Grade Equipment	140H	3176	Motor Grader	Caterpillar	2003	3CPXL10.3ESK
140-14	Fine Grade Equipment	140H	3176	Motor Grader	Caterpillar	2003	3CPXL10.3ESK
551	La Londe	140H	3176	Motor Grader	Caterpillar	2003	3CPXL10.3ESK
553	La Londe	140H	3176	Motor Grader	Caterpillar	2003	3CPXL10.3ESK
3473	Griffith	140H	3176C	Motor Grader	Caterpillar	2004	4CPXL10.3ESK
3486	Griffith	140H	3176C	Motor Grader	Caterpillar	2004	4CPXL10.3ESK
16-21	Fine Grade Equipment	16G	3406	Motor Grader	Caterpillar	1979	1263NA023
16-27	Fine Grade Equipment	16G	3406	Motor Grader	Caterpillar	1988	1263NA028
16-19	Fine Grade Equipment	16G	3406	Motor Grader	Caterpillar	1990	1347NA017
16-22	Fine Grade Equipment	16G	RM736	Motor Grader	Caterpillar	2007	
16-24	Fine Grade Equipment	16G	RM736	Motor Grader	Caterpillar	2007	

On-Road Vehicle Exemptions and Small Displacement Engine Exemptions

On-road vehicles and equipment have for the most part been granted a categorical exemption by LAWA. It should be noted that for the majority of the vehicles listed in Table 1.4.1-5 at least one CARB verified



diesel emission control system does exist and is compatible as it pertains to the requirements stipulated by the CARB Executive Order.

Royal Electric (Equipment ID numbers VH257, VH259, and VH261) and Griffith (Equipment ID 3572) were granted an exemption due to these vehicles being equipped with exhaust gas regeneration (EGR).

Equipment Number	Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Manufacturer	Engine Model Year	Engine Family
500	Robertson's	357	TBD	Concrete Truck	Pete	2004	
766	Robertson's	357	ISC 315	Concrete Truck	Pete	2004	
721	Robertson's	357	ISC 315	Concrete Truck	Pete	2005	
N/A	Goss Construction	Silverado 3500	N/A	On-Road Truck	Chevrolet	2006	
N/A	Goss Construction	F450	N/A	On-Road Truck	Ford	2000	
N/A	Goss Construction	F450	7.3	On-Road Truck	Ford	2000	
VH134	Royal Electric	F450 XL	TBD	On-Road Truck	Ford	2000	
I-85	Fine Grade Equipment	VALEW 7400	MAXXFORCE DT	Water Truck	International	2009	
VH119	Royal Electric	F450 XL	TBD	On-Road Truck	Ford	1999	XNVXH07.3ANE
N/A	Goss Construction	F650	N/A	On-Road Truck	Ford	2000	WCOXH0442HSK
VH128	Royal Electric	F450 XL	B235	On-Road Truck	Ford	2000	YNVXH07.3ANA
VH129	Royal Electric	F450 XL	B235	On-Road Truck	Ford	2000	YNVXH07.3ANA
VH170	Royal Electric	F250XL	B250CF	On-Road Truck	Ford	2002	2NVXH07.3ANC
VH186	Royal Electric	F450XL	A325	On-Road Truck	Ford	2003	3NVXH06.0AEA
C-3	Concrete Coring	F550	N/A	On-Road Truck	Ford	2004	3NVXH06.0AEA
C-34	Concrete Coring	F550	N/A	On-Road Truck	Ford	2004	4sZXH06.64AA
VH274	Royal Electric	F750	ISB 215	On-Road Truck	Ford	2005	4CEXH0359BAG
VH215	Royal Electric	F650	С7	On-Road Truck	Ford	2005	5СРХН0442НВК
VH254	Royal Electric	F250 XL	A325	On-Road	Ford	2008	6NVXH06.4AGC

Table 1.4.1-5: On-Road Vehicles & Equipment Granted a Categorical Exemption



				Truck			
VH252	Royal Electric	F250 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
VH170	Royal Electric	F-250 XL	B250CF	On-Road Truck	Ford	2002	2NVXH07.3ANC
VH213	Royal Electric	F450 XL	A325	On-Road Truck	Ford	2005	5NVXH06.0AEC
VH216	Royal Electric	F550 XL	A325	On-Road Truck	Ford	2005	5NVXH06.0AEC
VH205	Royal Electric	F250XK	A325C	On-Road Truck	Ford	2005	5NVXH06.0AED
VH210	Royal Electric	F250 XL	A325C	On-Road Truck	Ford	2005	5NVXH06.0AED
VH224	Royal Electric	F550 XL	A325	On-Road Truck	Ford	2006	6NVXH06.0AEC
VH225	Royal Electric	F550 XL	A325	On-Road Truck	Ford	2006	6NVXH06.0AEC
VH237	Royal Electric	F250 XL	A325	On-Road Truck	Ford	2007	6NVXH06.0AEC
VH242	Royal Electric	F250 XL	A325	On-Road Truck	Ford	2008	6NVXH06.4AGC
VH256	Royal Electric	F550 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
VH258	Royal Electric	F250 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
VH257	Royal Electric	F550 XL	A325	On-Road Truck	Ford	2008	6NVXH06.4AGA
VH259	Royal Electric	F450 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
VH261	Royal Electric	F450 XL	A325	On-Road Truck	Ford	2008	7NVXH06.4AGA
C6	Concrete Coring	F550	N/A	On-Road Truck	Ford	2008	BNVXH06.4AGC
VH116	Royal Electric	FL-70	3126	On-Road Truck	Freightliner	1995	SCP442DzDARK
3572	Griffith	M2	OM926LA	Flat Bed Truck	Freightliner	2006	6MBXH7.20DJA
264027	ARB, INC.	10K Reachlift RCH	QSB4.5	10K Reachlift	JLG	2007	7CEXL02.75AAG
3570	Griffith	G10-55A	3472/2400	Telehandler	JLG	2007	7PKXL04.4NJ1
351	Robertson's	357	ISC 315	Concrete Truck	Pete	2004	2CEXH0505CAX
608	Robertson's	357	ISC 315	Concrete Truck	Pete	2004	4CEXH0505CAR
T-22	Savala	330	ISC260	Water	Pete	2004	4CEXH0505CAS
T-23	Savala	330	ISC260	Water Truck	Pete	2004	4CEXH0505CAS
147	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX



171	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
722	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
179	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
148	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
146	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
682	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
652	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
142	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
143	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
141	Robertson's	357	ISC 315	Concrete Truck	Pete	2006	5CEXH0505CAX
1078	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	5CEXH0505CAX
1118	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1024	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1112	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1080	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1081	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1095	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1082	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1079	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1030	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1144	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1027	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1105	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1083	Robertson's	357	ISC 315	Concrete	Pete	2007	6CEXH0505CAX
1140	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1093	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX



1139	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1029	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1054	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1137	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1053	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1142	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1047	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1156	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1143	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1145	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1138	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX
1141	Robertson's	357	ISC 315	Concrete Truck	Pete	2007	6CEXH0505CAX

In addition, LAWA granted an exemption to diesel equipment with a horsepower rating of less than or equal to 50 hp; this equipment is listed below in Table 1.4.1-6:

Table 1.4.1-6: Equipment Less than 50 hp was Granted an Exemption from the CBA BACT Requirements

Equipment Number	Equipment Owner	Equipment Model Number	Engine Model	Equipment Category	Manufacturer	Engine Model Year	Engine Family
LP003	Royal Electric	MH400	D-850	Light Plant	Coleman	1990	
LP004	Royal Electric	LT4	3LB1/PV.04	Light Plant	Wacker	1999	JOZ1.1U6D2RA
LP007	Royal Electric	320-4000 LT4	3LB1	Light Plant	Wacker	2000	Y3ZXX01.1WNA
LP006	Royal Electric	320-4000 LT4	3LB1	Light Plant	Wacker	2000	YSZXS01.1WNA
LP008	Royal Electric	LTC4L	LDW 1003	Light Plant	Wacker	2002	2LBDL.916F69
LP009	Royal Electric	LTC4L	LDW 1003	Light Plant	Wacker	2002	2LBDL.916F69
LP010	Royal Electric	LTC4L	LDW 1003	Light Plant	Wacker	2002	2LBDL.916F69


482098	ARB, INC.			Air			
				Compressor			
482132	ARB, INC.			Air			
				Compressor			
534003	ARB, INC.			Pump			
534033	ARB, INC.			Pump			
RLF1488	ARB, INC.			Light Plant			
AC021	Royal	P185 WJD	4024-TF-	Compressor	Ingersoll	1999	XJDXL06.8016
	Electric		150B		Rand		
AC022	Royal	P185 WJD	4024-TF-	Compressor	Ingersoll	2000	XJDXL06.8016
	Electric		150B		Rand		
AC025	Royal	P185 WJDR	4024-TF-	Compressor	Ingersoll	2007	7JDXL02-4090
	Electric		270		Rand		
AC026	Royal	P185 WJDR	4024-TF-	Compressor	Ingersoll	2007	7JDXL02-4090
	Electric		270		Rand		
CB1	Concrete	N/A	N/A	Air	John Deere	2000	YJDXL06.8016
	Coring			Compressor			
CB6	Concrete	N/A	N/A	Air	John Deere	2000	YJDXL06.8016
	Coring			Compressor			

1.4.2 American Airlines Lowboy Hangar Demolition Project

As discussed in Section 1.2.2, all equipment that operated in conjunction with the American Airlines hangar demolition project during 2012 did so under a LAWA exemption. This is illustrated in Table 1.2.2-1. Due to the relatively short duration of the demolition, the majority of equipment operated under a 20-day exemption, and was removed from the airfield at the end of the exemption period. One (1) piece of construction equipment, a Komatsu PC300 excavator operated by Valverde Construction, was granted a driver visibility exemption.

Task 5: Ultra Low Sulfur Diesel and Other Fuels

Section X.F.5 of the Community Benefits Agreement requires that all diesel equipment used for construction on LAX Master Plan Projects use only Ultra-Low Sulfur Diesel (ULSD) fuel containing 15 parts per million (ppm) of sulfur by weight or less. This requirement is in effect as long as adequate supplies are available in the Southern California region.

There are three tasks in the Scope of Work for the Third Party Monitor related Ultra Low Sulfur Diesel.

• Task 5.1 - Contractor shall monitor, document, and independently report on construction equipment related to LAX Master Plan Program construction as it relates to the use of ultra-low



sulfur diesel fuel. Contractor will be provided all available fuel procurement records for construction equipment related to the LAX Master Plan Program;

- Task 5.2 Contractor shall independently verify and report to LAWA and the Coalition Representative that adequate supplies of ULSD are or are not available in Southern California.
 For the purpose of this Task, "Southern California" is defined as the geographic region comprising Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties;
- Task 5.3 Contactor shall independently verify and report to LAWA and the Coalition Representative that fuels substituted in lieu of ULSD do not result in greater emissions of fine PM or NO_x than that which would be produced by the use of ULSD at 15-ppm or lower. Verification will be based on CARB certification or equivalent.

South Coast AQMD Rule 431.2, which took effect on June 1, 2006, requires diesel fuel refined and sold for on-road and off-road use within the jurisdiction of the AQMD to contain no more than 15-ppm sulfur by weight. The California Air Resources Board subsequently adopted this requirement on a statewide basis on September 1, 2006. Thus, ULSD is the only diesel fuel legally available for purchase within California.

To independently verify the sulfur content of the diesel fuel used by equipment operating on LAX Master Plan projects, CFCI has requested fuel purchase records from the contractor and has examined the fuel receipts to ensure that only ULSD is being used. Fuel purchase records are clearly marked "ULSD"; thus, there is no ambiguity as to whether or not the fuel has the ultra-low sulfur content.

Task 6: Operational Requirements

Section X.F.6 of the CBA requires that Operational Requirements be issued and enforced by LAWA as it pertains to: a) limitations of equipment engine idling; and, b) maintenance of equipment engines.

The environmental requirements mandated by LAWA state that *"Contractor shall prohibit construction diesel vehicles or equipment from idling in excess of the idling restrictions as defined in the CARB Vehicle Idling Rule. The contractor shall advise drivers and operators of these requirements at the preconstruction orientation meeting, remind them on a daily basis, and post signs in appropriate places indicating the CARB Vehicle Idling Rule. Exemptions may be granted for safety and operational reasons, as defined in CARB or as approved by the Engineer. The contractor and subcontractors shall have policies*



and procedures in place for compliance with the Vehicle Idling Rule and a copy of such shall be submitted within 30 days of Notice to Proceed to the Engineer for approval".

In CFCI's capacity as Third Party Monitor, monitoring, documentation, and reporting of operational requirements was conducted in accordance with the following two Tasks:

- <u>Task 6.1</u> The Independent Third Party Monitor shall establish processes and procedures for determining whether a construction firm is complying with the operational requirements specified by LAWA. For the purpose of this Task, Operational Requirements include, but are not limited to, engine idling and engine maintenance requirements;
- <u>Task 6.2</u> The Independent Third Party Monitor shall monitor, document, and independently report to LAWA and the Coalition Representative on operational requirements issued and enforced by LAWA as they relate to limitations on idling and engine maintenance, at a minimum. Idling and engine maintenance records for construction equipment related to the LAX Master Plan Program will be provided to the Contractor by LAWA.

The following sections describe the process developed and implemented to track adherence to the operational requirements delineated in the CBA, as well as the independent findings of the Interim Third Party Monitor.

Process for Determining Compliance with Operational Requirements

The process to determine construction contractor compliance with the Operational Requirements set forth in the CBA has two distinct components:

- 1. Review by the Independent Third Party Monitor of applicable written procedures, monthly logs, and records documenting construction contractor compliance with Operational Requirements;
- 2. Onsite inspections conducted independently by the Third Party Monitor to confirm Operational Requirements are being implemented in accordance with CBA requirements.

In conducting reviews of construction contractor records, logs, and written procedures, requests for specific information and/or documents were submitted by the Third Party Monitor to LAWA's construction manager's staff. Requests for documentation were in turn submitted to the construction contractor by LAWA. This protocol was established and adhered to by all parties to ensure the reporting relationships between LAWA project management and the construction contractor were maintained



and to prevent requests from the Third Party Monitor being construed by the construction contractor as contractual direction.

Once obtained by LAWA construction manager staff, the requested records, logs, and written procedures are provided to the Third Party Monitor for review. In most cases, photocopies are provided. In certain cases, such as equipment maintenance records, however, documents are retained at a location other than the on-site construction trailers; this requires that the documents be inspected at the offsite location. This is discussed further under Task 6.2, below.

Vehicle and Equipment Idling – The Environmental Requirements for the Tom Bradley Terminal Project prohibit construction vehicles and equipment from excessive idling in accordance with the restrictions defined in the CARB Vehicle Idling Rule⁵. This Rule, more formally referred to as the *Airborne Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling*, is codified in Title 13 Section 2485 of the California Code of Regulations and took affect on February 1, 2005.

The law states that operators of diesel fueled commercial vehicles with a gross vehicle weight rating (GVWR) of 10,000 pounds or greater shall not idle their vehicle's primary diesel engine for greater than five (5) minutes at any location. The law only applies to commercial vehicles that are or must be licensed for operation on the highway.

The "five minute rule" is waived under the following circumstances:

- Idling when the vehicle must remain motionless due to traffic conditions;
- Idling when the vehicle is queuing that at all times is beyond 100 feet from any restricted area (i.e., homes and schools);
- Idling to verify safe operating condition;
- Idling mandatory for testing, servicing, repairing, or diagnostic purposes (cleaning of commercial vehicles is not considered servicing);
- Idling when positioning or providing power for equipment that is performing work;
- Idling when operating defrosters, heaters, air conditioners, or other equipment to prevent a safety or health emergency.

⁵ <u>www.arb.ca.gov/toxics/idling/regtext.htm</u>



While the CARB Rule pertains only to "on-road" vehicles, it is important to note that LAWA extends the CARB idling restrictions to off-road vehicles and equipment operating in conjunction with the Tom Bradley International Terminal and American Airlines hangar demolition projects. In practice, LAWA's enforcement of idling restrictions exceeds those mandated under the CARB Rule for both on-road and off-road vehicles and equipment.

The Third Party Monitor reviewed and independently verified the following documentation pertaining to notice of idling restriction requirements:

- Posted Signs large signs are posted at the construction site entrance in clear view of trucks entering the air operations area. These signs clearly state the restrictions on vehicle idling, as shown in Figure 1.6.1-1;
- Written Policies LAWA construction manager staff provided the Third Party Monitor with copies of the written idle restriction policies and procedures provided to the construction contractor;
- Notes from construction contractor/LAWA Project Management Status Meetings in which reiteration of LAWA idling restrictions were reviewed.







It is the observation of the Third Party Monitor, and confirmed by LAWA project management, that excessive idling is less of an issue as compared to previously implemented LAX Master Plan projects such as the South Airfield Improvement Project (SAIP). The CARB anti-idling rule has been in place long enough that most vehicle and equipment operators are aware of its existence. Also, due to the price of diesel fuel, it is cost-effective to turn the vehicle engine off when not needed.

The limited amount of necessary enforcement of excessive idling restrictions continues to be performed on a "catch and release" basis; the LAWA project management staff detect an idling vehicle and inform the driver of the idling restrictions and ask them to turn their engine off. LAWA does not cite or fine the driver for a first offense. In discussion with LAWA project management, the policy of issuing a warning has worked successfully and there have been no documented repeat offenders. According to LAWA project management, during the period of July 1st through December 31st 2011 the average occurrence rate for excessive idling is less than one incident per week.

Equipment Maintenance Records – The CBA requires that the construction contractor properly maintain all equipment in accordance with the manufacturers' specifications and schedules. Further, that all maintenance and repair records shall be made available upon request. The Third party Monitor has made this request and is awaiting receipt of vehicle maintenance records.

LAWA project management and the Third Party Monitor also conduct regular visual inspections of diesel equipment operating on LAX Master Plan projects, looking for excessive exhaust soot or other indications that the equipment is in a state of disrepair. During the reporting period, one (1) vehicle was determined by LAWA to be emitting excessive smoke. The equipment owner was instructed to remove the vehicle for repair or remove the vehicle from the airfield. The vehicle was removed, repaired, and returned to service. This action is also discussed under Task 7, Enforcement by LAWA.

Task 7: Enforcement by LAWA

Section 7 of the Independent Third Party Monitor Scope of Work states that: "The Contractor shall monitor, document and independently report to the Coalition Representative on enforcement actions by LAWA".

During the period of January 1st through December 31, 2012, LAWA project management and environmental contract staff did not levy any fines against a Master Plan project construction



contractor. LAWA did, however, take informal actions on multiple occasions to correct activities not in keeping with CBA obligations, but deemed insufficiently serious to warrant formal enforcement or fines.

Examples of informal enforcement actions taken by LAWA, and reported to the Third Party Monitor, include the following:

- Vehicle and Equipment Excessive Idling LAWA project management and environmental contractor staff identify approximately three to four vehicles each month that appear to be idling in excess of the five (5) minute maximum. In all cases, the driver has been instructed to turn off the vehicle engine, and is made aware of the idling restrictions enforced on LAX construction projects. Individuals are also instructed that a repeat offense may result in a fine. During this reporting period, several drivers have received verbal warnings;
- LAWA project management investigated one noise complaint a passenger in an airline VIP lounge complained of excessive jackhammer noise. The result was that jackhammer operations were rescheduled to a later shift when the VIP lounge was not in operation.

No enforcement actions were required for fugitive dust emissions.

Task 8: Reassessments of Emission Control Devices

The Community Benefits Agreement Section X.F.9 requires that a reassessment of best available emission control devices be conducted on an annual basis, or more frequently if warranted. The purpose is to ensure that bid documents take into account advances in emission control devices prior to bidding new construction phases of the LAX Master Plan Program. This reassessment was conducted for all verified devices as of December 31, 2012.

Section X.F.9 further requires that the emission control technology review process include any new and relevant requirements or regulations promulgated by CARB or the U.S. EPA, with the understanding that the results from any reassessment of diesel emission control systems cannot be applied retroactively. Specifically, Section X.F.9.b. states "any new designations of emission control devices as best available shall apply only to projects that start after the devices are verified or certified for use by CARB or the EPA... "

For this report, CFCI reviewed all CARB-verified, Level 3 emission control devices as of December 31, 2012 for application to the LAX Master Plan project equipment. As part of CARB's verification program,



device manufacturers periodically update their verifications, often adding eligible engines for a particular device, or otherwise revising the conditions of a device' verification. For this annual review, each CARB Level 3 device was evaluated for applicability to the LAX Master Plan project fleet. In a number of cases, revised or new verifications were found to be applicable to vehicles not previously deemed to be "retrofitable". It is important to note, however, that findings under Task 8 are not applied to ongoing projects but are instead intended to broaden the number of devices available for follow-on Master Plan Projects.

In the period between July 1, 2012 and December 31, 2012, four (4) new diesel emission control system has earned CARB Level 3 verification for on-road diesel vehicles and equipment. No devices were verified for off-road equipment during the subject time period.

Task 9: Implementation of Public Complaint Registration Process

Task 9 of the Third Party Monitor Scope of Work requires the contractor to develop and implement a public complaint registration process. The components of the task are:

- Task 9.1 Contractor shall develop and implement a process allowing any member of the public to register a complaint alleging any entity's noncompliance with the requirements of CBA Section X.F.
- Task 9.2 Contractor shall investigate all complaints registered by a member of the public and determine if, when, and where a violation occurred. Contractor shall notify LAWA and the LAX Coalition Representative each time a complaint is registered.
- Task 9.3 Contractor shall provide records or summaries of public complaints registered with Contractor, including actions, findings, and determinations, to the public upon request. Contractor shall provide LAWA and the LAX Coalition Representative copies of all actions, finding, and determinations requested by the public.

As LAWA already has a widely publicized hotline for complaints, it was decided to utilize the existing number instead of establishing a new one in order to avoid duplication and potential confusion in the community.

One (1) documented public complaint was logged during the period of July 1, 2012 through December 31, 2012. This is the jackhammer noise complaint discussed above in Task 7. No fugitive dust



complaints were recorded, and LAWA, the South Coast AQMD, or any other environmental regulatory authority took no enforcement actions during that period.

Factors that most likely contribute to the absence of public complaints include:

- Dissemination and strict enforcement of the environmental requirements of the CBA by LAWA project management and inspectors;
- Construction activities associated with Tom Bradley Terminal and American Airlines Lowboy Hangar Demolition projects primarily take place largely in the geographic center of the LAX airfield. Sensitive receptors, such as the communities of El Segundo, are to a large extent buffered by the South airfield runways. A similar situation exists on the Northern area, where the North airfield runways provide a buffer. This serves as a barrier to common construction nuisances such as noise curfew violations.



SECTION 3 - RESULTS AND CONCLUSIONS

The following is a summary of Third Party Monitor independent monitoring results and findings for the six-month period commencing July 1, 2012 and ending December 31, 2012:

- Monitoring and documentation of diesel equipment utilized or proposed for utilization on two LAX Master Plan projects. Approximately 352 pieces of diesel equipment were independently assessed to determine compatibility with a commercially-available CARB/EPA-verified diesel emission control system;
- Monitoring of diesel emission control devices installed on construction equipment. As documented in the above Sections of this report, all devices currently in use on LAX construction projects have been deemed functional;
- A review and documentation of all exemptions granted by LAWA that allow a piece of diesel construction equipment to operate on LAX construction projects without a best available control technology retrofit. This includes equipment that was deemed incompatible with a verified VDECS, granted an exemption on the basis of safety, or granted a "20-day" exemption on the basis of infrequent equipment use;
- In accordance with CBA requirements, CFCI conducted a reassessment of available CARB and EPA-verified diesel emission control systems. This reassessment is conducted on an annual basis. The intent is that LAWA use these findings to designate newly verified devices as best available control devices and incorporate the requirement to use these devices into construction bid documents for new construction phases of the LAX Master Plan Program. These findings, however, are not to be applied retroactively to Master Plan Projects already in the construction phase.

Overall, diesel equipment used on construction activities during the specified time period was found to be in substantial compliance with all provisions of the CBA Section X.F. As noted in a prior Semiannual Report, a few cases were identified where diesel construction equipment appear compatible with a Level 3 VDECS but are not identified by LAWA as requiring a BACT retrofit.

The next Semiannual Report will cover the period commencing January 1, 2013 and ending June 30, 2013. Final monitoring of the demolition of the former American Airlines lowboy hanger will be



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reported at that time, including quantification of emission reductions. Phase 1 construction activities for the Taxiway T Master Plan Project will also be reported.



landadurar	Engine Model Tear	Engine Family	LSD Rodes (Kive earlies from Feb 2012)	ON or OFF Read (Seri Column)	Exemption Request Approval Date	Exemption Vision	Emissions Controls installed	Computable Device as off-televany 1, 2009	Compatible Device as of January 38, 2013	Compatable Device as of December \$1,2011	Ery Notes for Charges from Last Report	Englise Carlinal Typizess Purifilier (off road) DCS #11-002-8020	Catespiller D/W (specific 1996-2005 <u>OP2</u> 401	Engine Compatible with ICS Contriller (2007 or older <u>201</u> 8040)	Charles House A.	Engine Compatible with HUSS PS-MX (must pre-2027 (20.80) and must pre-2020 (27.82)	Centre Horizon (ment pre 3007 (11 Mil) Insted 2006 Mil and pre 5990 and older Day Navy OSM 2000	Costre Langview (19415-2006-Dis RD)		Cirules Valia (an read)	Ceater Langelle (on read)	Cruite Lonentiar (eff road)	Chaire Phoenia (effread)
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Gent (error)	2006	62010.06.8082	UE added No.1s OE or 1/20/21, Per IPN, MPR should be Dense	07	no date on water tarm	water reported based on 3/3,09 date; and ARE Verification Database printing to prior same		HUR 75 MX 401-06-007-02 ECL# 08-662 179	HU25/15-54X 4028-08-002"-08, EC14 10:540-420	HUDS FIGHT ADD OX 4027-025 ECL #12-442-843		m	80			sm.	**						
Value	2009	9493132.8864	LED added the to DB on 1/01/11 LED added the to DB on 1/01/11 (LED	07	WAVER REQUEST DATE May 5, 2010	used ABE Verification Database protond to proteinistic watter requested based on 2/1,071 dates used ABE Verification Database protond to more same watter requested based on 2/1,071 dates used ABE Verification Database protond to community		excluded from HUIL(MY) ECLetther (MY)	excluded from HUEL; also 2009 not convertily root recent ECS	skill excluded from WLR3; also 2009 sol covered by mod recircl BC3	BE could not incide a compatible device	ND	80	NO		80						NO	NO
Gabada Devia	2002	2020102.29CD	Changed had believe of DN han "I" in	07 07	MAY 8, 2010	used ARE Verification Exclusion probably in sound ARE Verification Exclusion probably waters requested based on 2/3,00 date; used ARE Verification Exclusion probably in sound ARE Verification Exclusion probably in		NUE 7546 401 00 007 02	HUTE FEMALADE OF OF OF OF			ND	1										
lan Damire	2005	5050445057	LED added dos to DB on 1/19/11 (MAY- 100ek the DV is a type and the two					HURITIAK KER GREET ED	HUSEPEAK ADD GE GD? GR HUSEPEAK ADD GE GD? GR BCHA 10 HIS 20	HALFINGER & CT CT		NO	1										
Hala	2005	64241.367490	doubt be 1206205.5275 - Exa, then the ECS is approved for it			water reported based or 3/3,09 date; used ABB Verification Socialous prior and in procession. water reported based or 3/3,09 date;																	
Hada Devla			LED added for to DR on U/19/11 (R.D.)			water reported based on 2/5,00 date; used ARE Verification Detablish printing to move the		HUTE FEAK 404 GE-00-007-02	HUTE FE 40K 400 - 00 - 027 - 00,	HURL FLAKE ADDI OF 007 CT		ND											
denta	2000	1021107.1005	Could be 122027 100% if so, then the 123 k approved for it			This is a 19881 - will not be used more than 20 days. OK wateer requested based as 3/3,09 date;		NUE 754X 401 00 007 02	HUSEPI 4K 400 GE 402° 40, DCL# 10463-420	HUS PARK 801-01-027-07 ECL 812-662-883		-				-							
Devis	2007	7023806-5034 8099107-2651	LSD added (No. to DB on 1/31/31 LSD-changed Die 1710 from	07 07	MAVER REQUEST DATE May 5, 2013	water reported based on 2/5,00 date, used ARE Verification Database printed in management of based on 2/5,00 date, used ARE Verification Database printed in management		HUB rol (K(MY)	EPICE evaluated from HUSE HUSE PE-face allow de color day ECLA 10-645-620	still recluded how HUEs, recluded how BCS. HUES PS-680, 803 - 00-027 - 07, BCS, 812 - 660 - 863	we men dat te zer å compatible denke	ND 183	Nor			ND 103							NO
law	2008	4091131.80X	ROMENTING WARDWARD AND Need to deale UniTEX - on larger matches/FZE or allow assesses -	07	May 8, 2013	and a second sec		HUB AND DE OF OF OF	ECL# 10443-420 HUE 754K #20-00-027-04	FEE ALL AND		10	No	~	-	ND ND				~		No	ю
head	2006	678X0333AAD	Heik De "X" should be an "X" Del water package industry that this well has a HUELPERDING 12 - see fair	07	**		NUE FillOnder-12 - prv usiner pickage info	hasdevice	hasdevice	haidester			Ne	~	-					~		No	No.
Case	2005	SKEKLOZISKAR	Cliffinger says	017		1		HUR /9-MK404-04-027-02	NUM PEAK ADD OF OD TO 10			ND	No	-	-	803	**	**		**	**	No	113
anyllar	1996	1CP14.82088J		07	na signature or date or water term	water reported, norman inclui farmindiatesk "Unable torinital"; EEE B EEE bellers indicates for of right" safety have for any device.		KURITA MARCIN ON OTTO	NUTE 75-MX 402-08-027-04	EBA/Canada ThermaCat - DE 809-000- 02		ND	No	~	-	sus.	**			~	~	No	No.
aangilar	1997	VCP10.82DARF	<u> </u>	ar	na signature or date on water term	wither requested, no reason similar, dam indicates "Statungsalers are exempt";		NUM FEMICION OF OUT OF	NUTL FORMAGE OF GET OF	HURLING ALL PLANK ALL CONTENT		ND	No	~	1	-	**			~		No	80
anyllar	1997	VCP10.820ABG		07	na signature or date on water term	water requested, so recom sincled, dans indicates "Matargades are exempt")		NUM / 1 MIC 401 01 02 12	NUM FORMATO OF OF OF	HUE FIGHE BOL OF OUT OF EEK Canada ThermaCal - DE 809-000- 02		ND	115	**	+	sus.	**			**		No.	
anylar	1997	VCP10.82DARG	1	ar	na equiture or date or.	exempt") water requested, so reason sincled, dem indicates "Statusgiades are secured".		NUM /10 MICHON 00-007-02	NUM /0 MIX #01 00-027-08	03 HUIS PLAN ADD 08-007-07; ESW Canada ThermaCal - DE 409-000	1	NO	vis		-				1	~		No	
anyilar	1998	WCPKL10.36RK	t		na eguture or date an water term	exempl ²) Waters request farm dated 1/12/30 industry, a DPF is installed.	Mater Report dated 5/53(00 Industry a DPT & resulted	NUM / 1 MICAGO (0 - 027-02	hasdevice	03 Nacilmán			vis		-					~		vis	18
anyllar	1998	WORLIESMRF		a1		namer repetiel, no reason sicile) dans indicates "Materpades are exempt"		HUE 75 M (401-08-027-02	NUTE 75 MIX 804 04-027-04	HURLING WARDS OF OUT OF		ю	No		-		**			~		No	-
ringilar	1998	WCPHLILLIAM	1					HUE 75 M (401-01-021-02	HUTE 75 MIC 404 06-027-04	HURS IN MIX 400 OF 007 OF		ND	No	**	-	ND.	84	**		- 10		No	50
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	2000	VEPICERSAN	Taxa a sher quant	ar	\$13,200	Water repeti fam dated 1/12/30 indicates a DPF & indicated.	Mater Report dated 5/32/00 indicates a DPP is initialied.	NUE-75-MK401-00-027-02	HURPOWERD OF OF THE	Tacaman			No	**	-	sus.	**			~		No	24
		SCPRESS.BESK		an				NUELPOMARE CONTROL	NUM FEMALES OF OF OF	HURST FEAR ADD GE-007-07		VES. NO	VIS Deadlor MRD-or Co. Rest WT aske WT		1	NIA NIA	**	**		**	**	VIS No	YES No
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inyilar inyilar				07 07	na signature or date on water term	nature requested, no result sincled, farm indicates "Minkergrades are		HURPONKAGE OF GET G				-								~	1		-
ainyilar ainyilar ainyilar	2001	SCPALIESMRF			na signature or date on water barn	water repetied, so reason dealed dawn indicates "Malangaabes aw exempt"; Water request from dated 3/12/20 indicates a DPP a reliabled.	Water Repard dated \$(12)(30 industry a DPP is installed.	HUR 75-MX 401-00-027-02	10070400000000	handmake		m	No	**	I	NIL.	**	-			**	No	
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Cateryllar	2004	6MV8105-6000	militak bezeyindakirisi	ar ar				KULINAKIDI 01-021-02	HURITS MAJOR OF OFT OF	15W Canada ThermaCal - DE #29+000- 07 HUBS PEAK #DE 08-007-07 ESW Canada ThermaCal - DE #29+000-		ND	No. 113	**	-	NR.	**			~		No. VIS	ns vis	103
Cateropliar	2004	SMFTL02.8MA	mbals.fee	0 17				X00754X30101010710	HUR TO MICEDE OF OFT OF	02 HUDS PS-MIX #DE 08-027-07; ECT #10, MIX #08		m	No		-	NB	**	**		~	**	No	No	**
Convoltar	2005	4079547.3965		017				KUR/INMC401-08-021-02	HURITS MAKER OF OFT OF	HUE FLAR ADD 01-027-07 ICL 823-613-614 IEW Careado Thermación - 08 809-030 - 03 HUE FLAR ADD 01-027-07 HUE FLAR ADD 01-027-07		m	***	**	-	su.		~		~	~	vis		*85
Convoltar	2005	4073128.8161		a1				KUR/INMARCH 06-027-02	HURITS MAKED OF OUT OF	ECLATO 463 463 ESA/Canada ThermaCal - DE ADP 000- HUELTH 466 201 00-007-07		***	- 113	**	-	NB.	**			~	**	No	m	*85
Cateryllar	2005	SCPXL07.2HSK		07				NUE /5440404-06-021-02	HUIS /S-MX 404 CO-027-CA	101 F1 401 401 401 401 101 401 401 401 102 401 401 401 102 401 401 401 401 102 401 401 401 401 401 102 401 401 401 401 401 102 401 401 401 401 102 401 401 401 401 102 401 401 401 102 401 401 401 102 401 401 401 102 400 102 400 100 100 100 100 100 100 100		m	No	**	-	wa.	**	~		~	~	No	vii	103
Celevyllar	2005	SCP10.07.2H5L		07				KUE/D-MK/601-08-027-02	HERE FEMALADE OF OUT OF	HUSE PEAK ADD GE-027-027 102.823-683-683 ERW Canada Therma Call - DE 809-032- 27 HUSE PEAK ADD GE-027-027		m	vis	~	-	NB.	**	~		~	~	vis		*85
Caterophier	2005	SCPTLOBARGE		07				KUR/INAK601-08-021-02	HUE 75 MK401 08-027 08	ECLASSING AND		m	m	~	-	NIL.	**	~		~	~	vis	mi i	985
Cateryllar	2005	SCPRERAPS:		ar ar				NUME PERMICIPAL OF OUT OF		HUE PERKEDE GE-007-07 102.833-683-683 108/Canada ThermaCal - DE 809-030- 03		m	wa .	~	-	102	-			~	**	vis	m	985
Complian	2005	\$P\$5125-2941		07	na signature or date or. water form	water repeting scream initial that blier from transmit initialing will it too and for any transmit desire and would		XUE /54X/401-01-021-02	HUE 75 MK #20 00-007 04	HUE PLAK KOLOGO (101) HUE PLAK KOLOGO (101) EM/Cavala ThemaCal - OF 829-000- 02		NO	No		_	NEL	24			~		Nor	vis.	103
Celevallar		2CPXL04.4MRA		07	na signature or date on water term	waitver requestion), na croater sinchel, dua teller lown insuma inducating and in law small for any insuman deduct and examile propositeristic time of site insues due to its cardig. Form stated 1(22):22 inducates a CPF is an under		KUR /5-MC401-01-027-02	HUTE FORMAGE OF GET OF	62 101		ND	No	10	-	103	**	**		~		No	No	
Celeryllar Celeryllar		2CPXLOL4MRA		01 01	wave lan	acides		NUM /94/00000000000000	NUM PERMANAN	HURLIN WEARE OF COMPANY OF		NO	No	-	÷	911 911				N	**	No	No No	
Convyllar Convyllar Convyllar	2006 2006 2006	2CPXLOL4MRA		07 07				800.75M/x010x0142	HER PERCENT OF OUT OF	HALL THAT ALL OF GE OF OF		NO NO	No No	10 10		NI NI NI	2			N		No.	No No No	
Calecyllar Calecyllar	2006	209XL0L4MRA IMVXL05.8AAC SMVXL05.4DDD		01 01 01				NUE FINICADE OL OF CE NUE FINICADE OL OF CE NUE FINICADE OL OF CE	NUM FORKAGE OF OF 10 NUM FORKAGE OF 00 TO 10 NUM FORKAGE OF 00 TO 10	HURLING ALL AND ALL AN		NO NO YEL	No.	10 10		NIL NIL NIL	2	14		2	14	No	No No YES	10 113 113
Cateryllar	2006	6CPTLORADISK		ar				KUE/DMX/00108-021-02	HUE TO MARK OF GEVEN	ECLIPTO 445 A45 HUBS PEAK aCE OF 027 47 ESA Canada ThermaCat - 02 A09 030- 47		NO	No	**	-	su su	**			2		vis	vis.	103
Cateryllar	2006	6073112.5658		07				KUE/1646/001/06/027/02	NUE 75 MK #01 00-027 01	HUELFIGHT COLOURS COLUMN COLUM			No	-	H.	vin.	2			2	1	14	**	985
Cateryllar Cateryllar	2006	6H35222547	Need to deck this 275 - no larger	an an				NUM 75 M (401 06 07 12	HUR TO MARGE OF BET OF	Hatta Photo and and an and an and an and an and an and an an an and an		***	No	**	-	NR.	na 10			2 2		No	No.	**
Celevyllar	2007	XPROMESS	mulicher, FUEL or silter spärens	a1	na signature or date on water term	Parameterized 5/53/32 indicates a CPP is on		KUE/16/06/001/02/02	NUMPO AN ADD OF OT O	HURL FS-682 #01 00: 007 07; ECL413-663 #61;		m	No		-	-				~		vis	m	105
Cateryllar	2007	XPROMESS		07	1			KUE/544(401-08-027-02	HURITS MAJOR OF OFT OF	21 House Private and Foundation of the Con- Inc. 413 443 443 443 1 Hill Consult Thermacki - 08 400-030		-	No	**	-	wa.	**			~		YIS	18	105
Convoltor	2007	7910104-011		017	na agusture ar date an water tem	Exerciption Request submitted 2(22)(52) uniter request based on Reason 82 (safety) Thick supported by a Quine GM better.		KUR /5MK/00108-001-02	HUE 75 MK401 00-027 01	47 HUR FLAK 401 (8-007 07) ECL402-600		-	No.	**	-	wa.	**			~		No.		105
Catoryllar	2007	79101.04.0N/I		017	1	Thick supported by a Quine CAT letter.		KUSU/SMC404-04-027-02	HURITS MADE OF OUT OF	H201 F546K 425 G6-007 425		m	No	-	-	NR.	**	-		~		No	vis.	NES
Calerydiar	2008	RP90.11.1658		07	1	Tempton Separal submitted \$12.55		NUE /546/401-06-021-02	HUSE FEMALADE OF OUT OF	HURL PEAK ADD GE-027-07) ECL #31-643-645 ETW Careeds Thermacki - DE #39-030 43		m	Ne	**	-	va.		~		~		No	vii	105
Celevyllar Celevyllar	2008	843352.005684 807/00/06-4999	Reed to thesh Uni.17% - on larger	ar ar	na signature or date on water turn	unter repeti basel on Resar 85 Insciences under 12 hal			1007340000-070	HUEL TO MK ADDI OF OCT OF		ND	No.		-	vn. vn	**		├ ──┼	~ ~	•	No	No.	**
Celevyllar	2006	SPICILOLANII	nanson, valit ir stitel spiros	07	na lignature ar date an	Exemption Request submitted (/12/52) water request land on Resum 52 (safety) - water referenced an attached briter of		NUE TO MARKET OF OUT OF	NUM FORMATOR OF OUT OF	H210 P1-08 #01 00:007 07; 00:415-060-803		-		~	_	m				~		No	m	NES
Cateryllar	2006	\$P101.04.001		07		support, but UD could not basin.		XUE /54X/401-01-027-02	NUE 75 M/C424 OF 02 T 04	HAR PLACED AND ADD ADD ADD ADD ADD ADD ADD ADD AD		m	No	-	-	vn	2	-		~	-	No	vis.	NEX
Celevyllar	2008	8PK01.05.6Pt2	Read is also interesting of the	017	na signature or date or water term	water requiried, Reasonfor Water is down in "Artikk" rem water requiried, in result shifed		NUE /9440404-06-021-03	HURPOWERD OF CET OF	HAR IN MERICIAL CO. CO. CO.		m	No	**	-	NB.	84	**		~		No	YEL	NES
Convoltor	2009	10, 10.15.255W	"P", stheraster E dars not match a device	07	na signature or date an water turn	water reported, no resum shales form indicated: "Unable to hold", OEE and ECS tellers indicates for all split" safety time for any device.			HUTE FORMATE OF OFT OF	H.32.754/L806-08-027-07		ND	No.	~	A local product of the state of	ND.	**	**		~	*	No	-	**
Dmis DHN	2005 2006	SCEXLOL BARR	Dis20% is far a Commissiongine Rend to check this20% - Laded the "D", otherwise 5 directed match a	017 017					HUR FORKAGE OF GET OF	HUE FLAR AD ALL AN ALL HUE FLAR AD ALL AN ALL HUE FLAR AD ALL AN ALL		m	No No		-	NIL NIL	na 14			2 2		No	No No	no No
Hiadhi	2002	1526.15.2678	Anne Inches Control of	07				NUE 75 M (401 00 001 02	NUE-75-MC402-08-027-04	NA 412-682-683 HUBS PENEKADI GE-6827-627 PER 425-682-682		m	No		25	NEL	84	**		~	**	No	No	**
Hiadh	2003	2520115707A	have EECOLIS 717.5 to the BEDGIS 717.6, otherwate it does not match a device	07 07				NUE 75 M (401 05 07 02	HURITOMIKADI OL-027-04	HUE FINELADE OF 007 07 ECLED-660 681 HUE FINELADE OF 007 07		m	No. 113	**	-	103	**	**	┝───┤	2 2	•	No.	No. 103	10
HEADN HEADN HEADN	2003 2004	620.05.93A	inara regine	07 07 07				KUE IS MAREE OF OF O	100.754X40101-02103 100.754X40101-02103 100.754X40101-02103	HOLE PERSON AND HOLE PERSON AND ADDRESS HOLE PERSON AND HOLE PERSON AND ADDRESS		m	No.	**		NI NI NI	** **			2 2 2		No	No No	913 913 913
Hiadh	2004	625055564	Nama engine Nored to sheck this 27% - via langer matches W222 or other spinors	ar ar				NUE 75 M C404 06-007-02	HUR TO MICIDE OF OFTO	nodeste - dae to bad ETN			No	**		NB.	2	**		~		No	84	**
Hiadh Hiadh	2004 2005	626.15.7F3	inan regine	G17				NUE 75 M (401-05-021-02 NUE 75 M (401-05-021-02	HUR FRANKASS OF OFT OF	HURS PERMANENT COLUMN AND ALL AND HURS PERMANENT AND ALL AND AND ALL AND ALL AND AND		m m	No No	50 50	111	933. 933	24	2 2		2 2	2	No No	No VIS	983 983
HEadN	2005	5524.05.516A	Natu eighte Need to sheck this 27% - na langer	017 017	na signature or date an water turn	Exemption Sequesi submitted 2(05,52) water mount based on Securit 2 ins		KURUTUMIKADI OLOTI (2)	HUR FRANKADE OF OFT OF	Hold The Section Coll 2017 (20) and an international moderate - the Social STN		***	No	**	1	NE.	**	2 2		5 5	5 5	2 2	, If and X are suitables	s, it? and X are suited
Hiadh	2005	5520.15.7678 5520.15.7678	inau regine	017 017		denie w of 17 days		NUE /94/001-00-001-02	HUR 75 MK 400 GL-027-GL HUR 75 MK 400 GL-027-GL	HUDS FEARE ADDI ON-0027-027 ECO 455 440 A00 HUDS FEARE ADDI ON-0027-027		m	No		-	983. 983.	**			2 2		No.	No No	983 983
Hiadh	2005	\$\$26,15,2638	inter regine	an an				NUE FAMILADE OL OT 12 excluded has 1625	HURPOMKAGE GOOT OF	ECO ATO AND AND HIGH PEAK ADD COLOUR CO DO ATO AND AND SHE restudied from FLOB, excludied from	the could not bearin a compatible	100	No			100	2 2	-		~		No	No	113
ingenial Kand	1999 2000	X309106.8016 X309106.8016	areast .	an an				NUE 75 M (401-00-021-02 NUE 75 M (401-00-021-02	NUM 75 MX 400 00-007-08 NUM 75 MX 400 00-007-08	ers rushalmi hum HUS, rushalmi hum ers rushalmi hum HUS, rushalmi hum	Annua Mill could not buirte a compatible Annua Mill could not buirte a compatible	ND	Ne	10		MB	14			~ ~		No	No No	no no
	2007	XEXLORDMAC	General Class. 7	a1	na ognature or date on water turn	waker repeting, surroun drifts) that blier from insteam indusing will is		KUERSMARD GET G	NUE 75 M/ 400 OF 00 TO	879 HUB FMR 201 (8-027 (2)) EC 212-980 883		NO 1915	No		-	NEL.				~		m	113	10
			Version des la UN anteres	a1	_	por potential fire of site inaccidant to the config. Exemption Request solution (RCC)(5), water result band on Result (El tos			HUR /5 MK401 01-027-04						-									
ingenalities	2007	7.036.03-4090	matches WIII is other spheres. Need to shock this ITN - on larger	an an	na signature or date on water turn na signature or date on water turn	water repet lated on feaso E3 (no decise word 3/1 Pm Exemption Report scientified 2(05/53) water repet lated on feaso E3 (no		NUE FINICIEL OF OF FE	HUE 75 MK 400 GF GF GF	endesire - dae to had EPU			No		-	NIS.	**			2 2		No	No.	~
Washer	2000	yustit.two	matches, HUEL or other spinees. Need to sheck this 27% - na langer matches, HUEL or other spinees.	07	na ognature or date on water turn	dense av of 17 Pen Exemption Regard submitted 2(00)(50) water regard based on Reson 81 (or dense av of 2(3.09)		KUE/154K401-06-027-02	HUE 75 M (#20 00-027 02	redesire - due to had EPK			No	**	-	*83.	24	-		**	**	No	84	**
John Deene John Deene	1996	1347944012	Need to sheck this 27% - na langer matches W222 or other spinors	a 1	na signature or date on water term	Exercision Request submitted 2(05,55) waters request based on Reason 85 (no desize as of 2/5,091 Exercision Request submitted 2(05,55)		HUR FEMALED CENT	HURPOMKADE 06-027-08	nodester - dae to had ETN				**	-	patential YEE since not on bit of exclusions patential YEE since not on bit of		**		~		w a 1996 K 11 C	No.	~
John Deene John Deene	1998 1999	1247904012	matches, VLEL or other spheres Need to sheck Unit 27% - on larger matches, VLEL or other sederes	ar ar	na signature or date on water form	water report land on feasin E3 (no denies as of 517 PB) Exerption Report submitted 2(00(50) water report land on feasin E3 (no		KUE/INACIOLOGICET-CI	HUE TO MAKED GO GET GE	endeske - dae in had DN					-	exclusions patiential YES since not on bit of exclusions	**			2	•	No.	No No	**
Jatha Deenie	2000	1201205-0215	Need in clock (b), (FN -1 changed in) dgt of (FN /one "4" to ("5") changed in clock (b), (b), (b), (b), (b), (b), (b), (b),	a1]	denie w of 10 per		KUTU-TO-MICADE-DE-DET-D2	NUTE 75 MAX 400 00-027-04	HUR FIGHER DE CE-CET CT; ECENTS 465-665		m	No	**	-	100				~		No.	-	
John Deene	2000	1201205-0215	Aired to check this IPE - I changed IPE from EECELS 7ETA to the EECELS 7ETA; otherwise it does not	a1				KUR /5 MK 401 00 07 12	HUE 75 MK401 00-027 01	HUR FEMALES 68-807-07		m	No	**	-	-	**			~		No	-	~
Jarles Deenve Jarles Deenve	2004 2004	1010104.5002	analois a danka	017 017				KUR FEMILIER GEGEN G KUR FEMILIER GEGEN G	HERE FEMALADE OF OUT OF	HURST IS WAR ALSO AS A COT OF HURST IS AN A STORE AS A COT OF HURST IS AN A STORE AS A COT		ND YEL	No No	50 50	-	sn sn	14			N		No.	No No	2 2
John Deene John Deene John Deene	2004 2004 2004	4309104.5063 4309104.5062 4309106.8041		07 07 07				NUE 75 M (401-01-021-02 NUE 75 M (401-05-021-02 NUE 75 M (401-05-021-02	HURLPEAK 400 00-007-04 HURLPEAK 400 00-007-04 HURLPEAK 400 00-007-04	HURS PEAK ADD ON-007-07 ECENTERIA ADD ON-007-07 HURS PEAK ADD ON-007-07 HURS PEAK ADD ON-007-07		ND ND	No No No	80 80 80	11	NI3. NI3.	28 28	2 2 2		~	2 2 2	No No	No No YES	10 10
Julia Deerier	2004	4000045043		a1	na signature or date on water turn	wäher requested, na reason dested, fas letter from transmissing und it.		NUM PRANKADA GA-GET-GZ	NUE 7546 400 00 007 01	HUE FLORE DO 100-007-07- 102-02-002-003			No		_	102	2 2			~		No	No.	
					water ten	water reported, or reduce do by data below from hermonic indicating with its tase small for any internation dentice and would prove potential for all site states due to its saving.				ECL412-642-643			~	**	-	***	2	-		-	_			
John Deeve	2004	4101634.5043		07	na signature or date on water form	that below from transmiss indicating well it. Ioo small for any transmiss device and would prompotential free of site issues due to its confin.		NUM /9-MIC404-08-027-02	HUTE-75-MX 451 08-027-04	HUR PHAR DO GLOD OF (0)		-	No	~	-	NR.	**			~	**	-	**	~
Julia Deerie Julia Deerie	2004	1201005.8015		07 07	1			800.7546.001-01-021-02 800.7546.001-01-021-02	HUR 75 M (400 08-001 04 HUR 75 M (400 08-001 04	excluded from HUSE, excluded from area HUSE PEAK 402 08-007 07	Bill could will be all a compatible dentes	ND YEL	No		-	*8	-			2		No	No No	no no
John Deerve John Deerve	2005	520104.5042		017 017				KUE /5 M(401-01-021-02 KUE /5 M(401-01-021-02	NUE 75 M (400 - 00 - 00 - 04 NUE 75 M (400 - 00 - 00 - 04	HURLING PERMIT		783. 783.	No	**	-	NEL NEL	24			2		No	No 183	10
Julia Deerie Julia Deerie	2005 2006	532952658045 632952455662		01 01				KUE75MC40148-821-82 KUE75MC40148-821-82	HUR FEMALED CONTRACTOR	HUR THERE IS AN AD		WE NO	No	N0	I I	NEL	2 2	2 2		2 2		No	783. No	NI3 F0
John Deene John Deene	2006	62010305062	ļĪ	017 017	na signature or date on watver term	Water regard form dated 1(52/30 indicates a 2PP is included.	Water Reparal dated 5/12/20 Industries & DPP Is installed.	NUE FAMILIE (C. C. C.	HURPOMKAGE GE-GET-GE	handmake Huts Private addi dar dd7 d7;		m	2	-	1	su su	2 2			2 2	2 2	No	No 183	10 113
John Deeve John Deeve		6201206.8041		07 07				NUE 75 MC401-02-021-02 NUE 75 MC401-02-021-02	NUE 75 MX 400 08-027-02 NUE 75 MX 400 08-027-02	HURLING AN AN HURLING AN AN AN HURLING AN AN		m	No				2 2 2	-		~		No	783 783	913
John Deerve John Deerve	2008	832912658105		07 07	na signature or date on water fam	Water regard form dated 1/02/32	Water Report Advel 5/23/2*	NUE 75 M (401 05 00 10 10	HUR 75 M K400 00-007 01	HOLE IN ANY ANY ANY ANY ANY ANY ANY ANY ANY AN		m	No		-	NIL	2 2			2 2		No	783 700	103
John Deene John Deene	2008	\$109106.5106		an an	water ten ra	industries a DPP is industried. Na	Indicatives & DPT is installed. NULL FIEDDates 12 - per vasioner enclosus unter NULL FIEDDates 12 - per vasioner enclosus unter	HUR PRIMATE CONTROL	HURITOMIKADE GE-GET-GE	hacdroke			Ne	-	-	103	na Na			2 2 2		No.	70 70	
John Deene John Deene John Deene	2006			017 017 017	-			HUE PERCENT OF OF OF O	HURITOMICADE OF OFTO HURITOMICADE OF OFTO HURITOMICADE OF OFTO	Nacionia Huts Pi-lat act Or-007-07 ECLASS-00-001 Postalated have Nacional State	The second and in size a surgery of	m	No No	**	-	NEL NEL	50 50	**		2 2 2	0 0	No No	No No	50 50
John Deerve	2008	Y022010NMDEC Y02200VNMVEC	worg1957 worg1957	0 17				NUE 75 MK401 08-027-02	HURL FEMILADE OF OFT OF HURLING AN ADD OF OF OT OF	excluded have HUSS, excluded have area	Anna Anna Anna Anna Anna Anna Anna Anna	ND ND	No No		-	patiential YES since nul an bol of mechanism	84 54	**		~		Ne	No	**
John Deene	2009	\$2010.06.8305		07			ļ,	na likely match due to MY; Lowestor nal a match	DG, MINE-X4DE-09-013 Dealer Albertul Cond. Verill, Letter #39 441, 158	HUSS PEAK ADD OF 007 OF	Allmetial solinger approach.	ND	84	**		patential VII since not on hil of exclusions		~		~		No	viii.	105
Kamatha Kamatha	2001 2001	SKLALDSDSACA SKLALDSDSAARC	2nd Kis probably supposed to be an X.	an an				KUERSMART GEBENG	HURITS MICHEL OF OF OF O	H28 PH48 401 04-007 07 EC 415-60-815 H28 PH48 401 04-007 07 EC 415-40-405		m	YES, thise 2nd Kis a Type and is really as X YES	**	-	933. 933	10	**		2 2		No. VIS	via via	925 925
Kamaba	2003	BUXLOIOSABD BUXLOIOSABD		017	na signature or date on water term	Exemption Request submitted (321/52) matter request based on Resson 82 (safety)			NUM PLAN ACCORD ON OUT OF	HUR PLAN AND AN		m	185	**	H.	102		**		2	**	No	m m	-
Kamatka Kamatka	2004 2004 2004	BUXLOSOSABD		07 07				NUE PERCEPTOR NUE PERCEPTOR NUE PERCEPTOR	HU10/75 MIX #04 06-027-04	HULL PLANE ADD AN ADD HULL PLANE ADD AN ADD HULL PLANE ADD AN ADD HULL PLANE ADD AN ADD		m	vis vis	**	11	813	**	**		2 2 2	•	No No VES	ns ns	na na
Kanaba Kanaba Kanaba		38131110005		ar ar				KURUTANKER GERTER KURUTANKER GERTER KURUTANKER GERTER	NUE 75 M (401 00-007-04 NUE 75 M (402 00-007-04 NUE 75 M (402 00-007-04	HOLE ALL AND AND HOLE ALL AND AND AND HOLE PEAK AND AND AND AND HOLE PEAK AND AND AND AND		m	913 913	**	111	*13	*# *#	**		~			vis vis	no no 113
Kamatka Kamatka Kamatka	2004	6KUS28S9ABC		ar ar ar				KURITAMARI OLOFIA KURITAMARI OLOFIA KURITAMARI OLOFIA	HURITANKADI OLOFOX HURITANKADI OLOFOX HURITANKADI OLOFOX	HOLE PERCENT AND AN ANY ANY ANY ANY ANY ANY ANY ANY ANY		m	vis vis	**	1 1	NI3. NI3.	50 50	**		~		No. VES	913 913 913	983
Kamabia		46181355MBC 46181310005 9038095MB		017				NUE PERCEPTION	HURITOMICADE OL-DET OL HURITOMICADE OL-DET OL HURITOMICADE OL-DET OL	HULL PLAN ADD AN ADD AN ADD AND AN		m	m		11		**	**		~	•	VIS VIS No	413 413 413	913 913
Kamaba Kamaba		HIXLOOMAA HIXLOOMAAC		ar ar				HUE PERCENT OF OF OF O	10070100000000000000000000000000000000	HOLE ALL AND AND HOLE ALL AND AND AND HOLE PEAK AND AND AND AND HOLE PEAK AND AND AND AND		m	No.	**	11	102	**	**		2 2 2			783 783	NIS NIS
Kamaba Kamaba Kamaba		76336.15.2626	Minister and match DN-prime server	ar ar ar				HUE PANKADI GLEP (Z excluded han HUE excluded han HUE	HUR FAMILIE OF OF OF Packaded have HUR Packaded have HUR	Parlade and Geral and Strip provide and the second	Mill could not be all a compatible states	ND	No.			NIL No	**	**		2 2 2		No No	YES No No	515 F0 F0
Kamatha	2005	BUXLOIDSAAB	Contraction of the second seco	017				NUE 75 MK 401 OF 027 02	HURPONKADE 06-027-04	101 HUR PHAR 201 (0-027 (2))	And a local diversion of the second diversion of the s	NO YES	No.	985 60	-	No. 103	50 84	**		~	**	No	m	985
Kamatha Kamatha	2009	BUXLONDMAC	Note that DNI indicates a 2008/N, if ready 2009, their na dealor for 2/3/09	ar ar		Exception Report submitted 705/53		HURPONCED OF OP 12 HURPONCED OF 00 10 10	HUR FLAK KER OF OF OF O HUR FLAK KER OF OF OF Drain Langelin Card. Weit Ref & 20 613 515	H28 FM48.00 00-007 07 ECL4D-460-88		m	No		-	-	**			~	•	vis vis	983 983	983 983
Kamatka	2008	B13104098AAC	uning 1767	01 01	salar tan	Exerciption Engand submitted 2(02)(52) waters expand based on Reson 83 (no dense as of 2/2(01)		Course Laneslia Cand. Veril. Ref. #08-683- 683 HUR PAMILADE OF ORT 42	Crase Lanestar Cand. Vevil. Rol. 2-29- 612-623 001 Manufertrational Canada HURLPS MK 400-00-027-04	HURS PEAK ADD OR-022-025 ECLARD-040-040 Peakaded hum HURS, excluded hum are	BE could not be all a compatible	785 NO	No		-	NEL potential YES since not on bol of mechanism		**		2 2	a a	VES Nor	VES No	113
Million	2001	10441.551201		07	na signature or date on water turn	Exemption Request submitted \$(12)52) matter request based on Resson 88 (equipment under 52 bp) -watter form		NUM PERMANDE OF OTTO	HUE/15/MX400 08-027-04	excluded from H520; excluded from ECL	the could not be use a compatible	м	No		-	NR.				~		No	Re .	**
Million	2006	80401.958205		a1	_	(equipment and/e 12.1p) - water Tarm referenced PEP documentation is included, but it was not in my pinkage. Exemption frequest submittee (12.12)(52) water senses based on Farmer III		NUE 75 M C4D1-00-027-02	HUR /5 MK401 01-027-04	EL.			Ne	-	-					~		No	-	~
New Holland	2006	GREECO229AAB	engine is Dahatisa engine appears to be "CNP"? Notaes has INDIGAT OT A on ICA	GP7	na signature or date on wateer turn	Annotation of solar Wild		XUE /5 MK401 01-021-02	NUE/154K/401-06-027-04	HURL PLAN ALC: OF OCT OF HURL PLAN ALC: OF OCT OF ECHICAGE ALC: ALC: ALC: ALC: ALC: ALC: ALC: ALC:	Manual et la co	ND 1715	Ne	na na	-	patiential VII since not united of exclusions	10 No			~	**	No	113	**
Noan By Trak	2006	SNOKLOZ 27TNA SCEXLOZPSAAR	Losan was shtelidat of fillion TCS Contribution tol Cummites	07 07				NUE FINICADE OF OFFICE NUE FINICADE OF OFFICE	HURITS MAKED OF GET OF	ECL HURS PEAK AGE OF OUT OF POWER AGE AND AND ADD ADD ADD ADD ADD	in mon di la de s'angelike deske	ND YES	No.	mayler (sol) - dealter clock IPA no	-	NE. NE.	14	2 2		2 2	a a	No	No 183	ND NES
Targel POBIS Targel POBIS	2001	4029102.9012	interved EFF	017 017				KUERSMARE GEBERG KUERSMARE GEBERG	1007040000000000	radialited from HERE reschalted from area reschalted from HERE reschalted from area ICLASS-660-883	Services difficulty a compatible denses Bill could not be alter a compatible denses	ND ND	No		1	983. 983	F.8.			2 2	а а	No	No No	10
lon lon	2007	6008114.0%D		ar ar		water reported, so reason circled but formindicates "ESE installed". water reported, so reason circled but formindicates "ESE installed".		HURITSMARDE GEGET GE	HURITOMICADE OF OFTO HURITOMICADE OF OFTO	Inclusion of the New Jonan State		m	No		-	NR. NR.	**	**		+	_	No.	70 70	**
	2007	6008114.040		ar ar		have industes "EDE installed". water requested, no masor circled but form industes "EDE installed".		NUE FRANCEDE GE-BET-BE	KURJUMKADI OLOTI OL	Inclusion of the basel ICLAID-660-800		m	No		-	NIL NIL	2 2	-				No	No.	
less					1		-	NUE 75 MK 404 08-027-02	KURPANKED GLODING	excluded from HUEs, excluded from ICL	Will could not be are a compatible device	мо	No	MARE - F2nEssee Here's ready a Ellers F1.4 MATOR	-	84	**					No. 10	e, Ellis realizan à, ils de	e, Ell lorenty and, D
Term Tyrnia	2005	SCENEDISHING	angles is currented	an																				

-	. I			r		r				N20 15-100 (021 03-028-05	1	-		-				-	-				
Pand	1999	XXV/00422.3AX45		094030				HUSEPI-WK KDE-08-008-000; Chaite Harksmäßlich-05-020-03 HUSEPI-WK KDE-08-008-000;	HUSEPING ADD-00-027-03; Charley Rankaun ADD-05-027-03; HUSEPING ADD-08-027-03;	Chaire Harbon #28 05 0500 06		~	**	-	923	NR.				915	~	~	**
Fund	2000	WCORHOMENSK WYYEHEZJANA		094030						Creater National ADE 05:032-05 Hubb PS-40X ADE 06:000-05;	10700	~		-	813	983.				NO	5 5	a a	**
	2000							HUSTING ADE OF ODE ODE Dealer Harison ADE OT 02003	HUSS 75-56K 4DE -08-002*-03; Cheater Rations 8DE -05-080-08;	Charter Market #28 05 000000; Charter Longende #201 20 000 00		~		-	NB.	NB.				885			**
Ford	2000	INVESTIGATION		094030				HURS FEAR ADD OF ODE ODE; Dealer Harkward/DE OF 02003	HUIS 15 4K 6DE -06 007-03; Chaine Karlans 8DE -05 00; 00;	Cross Harsen ECE (0) (000)		~		-	NIL.	vn				-	-		~
Fund Fund		2NVXH07.BANC		0940360				HUSE TO SEE ALL OF OUR ODE	HUSS 75-44X 404-08-027-05	Crate Nation ICE 05-032-05			-		NEL	NB				NO	2	2	
Fund	2003	INVOIDE DAEA		094030				NUMBER OF A CONTRACT OF A CONT	HUSITI-NK 604-08-007-08 NUSITI-NK 604-08-007-08 HUSITI-NK 604-08-007-08	Charten Franzen de 2011 VI. 2011 M Charten Hartson 202 - 03 000 08;	ne Tans	**		-	903. 903	983. 983.				955	~	8	
Pand		620105.5444	I charged the States 'V'	CN+GAD				Onaire Harban 600 CT-02003 HUSING-WK 600-08 CT-02003 Onaire Harban 600 CT-02003 HUSING-WK 600-08 CT-02003	Charan P Tantana (CC C1 C3) C5 HUTS175 54X (CC C1 C3) C5 Charan P Tantana (CC C1 C3) C5 HUTS175 54X (CC C3) C5 C5	Desire Lossenile #201-00-004-04 Desire Harlass #201-05-050-06;	no Tana			-	NIL NIL	NEL NEL				105	~	-	**
Fund	2005	4CKXH2359BAG		014030				HURS IS NOT ALL OF A COLOR	HUSS IS 400 KEE 46-027-03	Clearer Harlans BCE-05-050-06; Clearer Lancack EVEL 10-004-04	no Tues	~	14	-	923	NB.				955	~	-	14
Fand Fand		SCPXH0M2HBK		044330	**	~	NUE FillOwlaw 12 - per autors and have take	HUSEPICE AND A CONTRACT OF A C	HUSER WATER BEING AN AN AN	hacdinate			14	-	923	NB.					2	84	-
Fund	2006	6NV0H06-AASC 3NV0H06-AASA	The releases 2024 MY - this is basis for senarcism	044030	NO42010 - SUMMETED	Claim is these are less than 14,002 liss.0VW Claim is these are less than 14,002 liss.0VW		Onaire Harbon #20 05:030-03	Chainer Russiana ADD 05-032-04;	Creater Nariaan 808-05-032-06	no Taol Mil could not be alte a compatible		**		no 10	10				N0 80	5 5	2	14
Pand	2002	281/20102.3000		014040	NO42010 - SUMMETED	Claim is these are less than 14,000 liss DVW		na likely watch dae ta MF HJULTI-NK KCC-06-008-000;	na Belywabh dar ta MY Hutti 15 400 a'c di dot di Hutti 15 400 a'c di dot di Hutti 15 400 a'c di dot di Hutti 15 400 a'c di dot di	Croser Harlash SDE 05-032-05	And a second	~			10	NR.			_	NO	~	-	**
Pand	2005	SNVXH06.0AEC		014030	1			Huts is a water as one cost, Draw Mattern #25 05 (2003)	HUSEPEAK ADD GE 02: 02: 02 Chatter Rankan ADD 03: 02: 02	Charte Harbon ICE 05 050006; Charte Longmite ICE 35 000 04	no Trans		14	-	103	ND.				985	~	**	**
Pand		SNVHHDLDARC		094030				Chaine Harban 201 (5-02003) HULL IN MY ADD OF ONE ODD Chaine Maximum 201 (10-020-020) HULL IN MY ADD OF ONE ODD	Charlow Readown RDF CR CR CR CR HURS PS 44K RDF CR CR CR CR HURS PS 44K RDF CR CR CR CR HURS PS 44K RDF CR CR CR CR	Charter Hardware BCE-05-050-06; Charter Lancardia BCE-05-050-04	no Tana		2	1	NEL	sm.				985	~	2	**
Fund Fund	2005	SNVXHOL BAED		0940360					HUSEPI 44K 404 48 407 49	Cease Narias SCE-05-013-05	10746	~			825	NB.				NO	~	2 2	**
Fand	2005			044030				Paralam Management Mills (Tel. (1996)) Halls //S Mill Add (Sector)	HUSSPACE BELOW	Creater Nations 808-05-032-08 Creater Harborn 808-05-032-08	10 Tes	~		-	10.	NI3.				NO	~	2	
Fand	2006	ENVIOLEMENT		014030				HUSE/IS MX ADE OF COLOCO	HUTS PEAK ADD ON ONE ON	Chaine Harlann #CE-05-050-06;	10.746	~			100					113	~	-	**
Ford	2007	envires.cm/c		014030				mituded transformation Desire Harison 400 (01/02013	Rectadri Son Marian Rectadri Son Karlan Chaire Ration 800 05 053 00;	Chaine Harlane BCE 05 000000 Chaine Harlane BCE 05 000000 Chaine Langendre 8001 20 000 00 Chaine Rankam BCE 05 000000	no Tues	~	**	-	-	**				985		82	**
Fand Fand	2008	6NVX0406.4A5C 2NVX0406.4A5A		0940340				Onaite Harbon #00-05-030-03	Chaire Harlase ADE OS CED CE; na Biely watch dae to MY	Croser Hurlan ICE 05:033-05 no litely match-due to MY	no Nati 102 could not beate a compatible			-	na Na	10	2			NO 10	2 2	2 2	14 14
Fund		35030406.4464		044040				na litely waich due to MY	na Belymakh dae la MY	no likely matchedue to MY	Mill could not be ate a compatible	2		-	~	~	**		~	-		82	
Ford	2006	681/20105-64654		014030	8243010	Water required door theory effective ATE second and				Croser Revision 808-05-0532-06	danka	-		1 1 1	-	NB.				NO	- 14	-	14
Ford		35130406.4464		0440300	8243010	NR without Maker required Gaze Device which share NR without Million required Gaze Device which share SSR installed				Crose Relate SCE 05 01206		~	14	-	-	**	~		~	-	2		
Fund Fund	2006	TNV2HIGE-AAGA BNV2HIGE-AAGC		0940360	8243010	Balance requested size these vehicles have DDR installed				Creater Nariaan 808-05-032-05	Mill could not backly a correctible	~		-	**		**		-	~	~	2	**
Fund	1995	SCP462060ARK		044030		1		na likely watch due to MY	na Belymakh dae in MY HURSTS MK 400 (00 (02) (0)	na Meriy watahidar ta MY Huta Pi-Mix attr da-da-da Deure Harisan KG (0) (CO-0);	danta d			-		**		<u> </u>	-		2		
					1	1		HUSITI-MK KDE GE-00E-005; Dealer Harken #20-05-020-03	Chaine Karlase 808-05-052-06;	Owner Lower In 197 Works of									-				
Inspideer	2006	6M80H7.300M		014030	na signature or date on water term	Waser fam dated 3/13/10 misates his regime is BDR Equipped and the vehicle has a factory installed DDC		Chaiter Harlase ADD-05-033-08; excluded from HUTE	Chapter Hankson #DIE-05-022-08; michades/hom HU/26	Dealer Harbon 808-05-050-06 Dealer Langeste 808-02-02-03	no Tana	~		-	**					-	~	~	~
International	2004	INVOIDEENNA		044040	na agradure or date or.	Whiter request form dated 3/12/20 industes a DPP is industed.	Water Report dated \$/12/00	exilateithon HUE HUETHAN BOLOGODOD; Deale Harisan820-05-02003	HUIS 75-68X 4DE-08-027-03;	handmain		~	sheck17% Feedcasth "AGA", these is a	-	103, but d'17 emb in "AGE" & would NOT be OK								**
84	2007		is a currenting engine without the "dut"	0940340	whether	industry, a DPF is included.	indicatives a DPP is installed.		Chaire Harlase EDE-05-053-06; HUSS 75-54K EDE-06-027-05;		the could not be also a compatible	 ~	MOVE PEPE derivat	-	would NOT be OK				~	-	~	-	
80	2007	79401.04.4N/1	the second a local product	0140340	na agrature or date or. water turn	water requested, Resumber Water is		HURSTS MARK ADD ON CONCERN	HUSEPS 44K #24 -06 -027-05		Marine Mill could not be also a compatible	2	500 TOUT	-	NIL	~	**	1	~	**	-	**	**
Paia	2004	2013040505CAX	commissiongoup, MP vs. D78 docast.	094030				HURS PE SIX ADD - DE COS-COS- COLUMN ADD - DE COS-COS-COS-	HURSTS MAY JEE ON OUT ON	Crose Nation ICE 05:033-05	no Tues	- 14	14	-	NEL	NEL				ND	~	-	14
Pete	2004	ACEXHOSOSCAR		014040				HURSTS MX ADD: OR ODE ODE; Cheater Markans ADD: OS: ODE OD; HURSTS MX ADD: OB: ODE OD;	HUSEPI 4K 404 48 407 48	Huts Phare and the dot of the dot		~		-	NEL.	NB.				-	~	~	**
Pele	2004	BCEXHOSOSCAS		014030				HURS PEAK ADD ON ODD	HURSTS 44K 4DE OB 002*05	HURS PEAK ADD OF ONE OF,		~	-	1	123	NIS.				NO	na	8	**
Peie Peie		4CEX040505CAS		094330				HURS FEMIX ADDI-GE-GOB-GOD; Charlos Riselands RDF, CR, FAX, CR,	HUSE FEAK 404 404 404 405 405 405 405 405 405 405	HURS FIGHT ADD ON ONE OF		~	-	-	102	via				985	~	82	**
Pala	2006	SCEXHOSOSCAX SCEXHOSOSCAX	autorities.	094030				Chaine Mariana ECC 01-010-01; Chaine Mariana ECC 01-010-01;	HURST WE AD OF ON ONLY ON	Huge Frank por de de de		~		-	913. 913	NIS.				93	5 5	a a	**
Pele		SCEXHOSOSCAX		014040				Chaire Harlann 800-05-012-08	HUSS FILMER BDE OF OD OD OD Chatter Husban BDE OF OD OD OD	HUSS PEAK ADD DE COLOSE OF		~			NIL NIL					105	~	-	**
Pala	2006	SCEXHOSOSCAX		014030				Chaiter Hariana KCO CO COS CO multiple Mariana KCO CO COS CO Chaiter Hariana KCO CO COS CO multiple Chait NOT	HUSS 75 MK #DE-06-002*-03;	HURS PEAK ADD OF ODE ON			**	-	103	×m.				985	~	-	**
Paia	2006	SCENHOSOSCAX		094030				Chainer Martiane ACE OF CED CE; and Calabilities and CE CE CED CE; Chainer Martiane ACE CE CE CE;	HURST FARMER EDG OF OD OD HURST 40X EDG OF OD OD	HURS FIGHT ADD DE COLOR-DI; Present Lancada ADD - Discharter		*	**	-		vn.				985	~	-	
Peie	2006	SCEXHOSOSCAX SCEXHOSOSCAX		0940360				Chaire Ration ECE (5:535-55) and chaire Ration ECE (5:535-55) Chaire Ration ECE (5:535-55)	HUB ITS AIK BET GE OD TO A	Huts Pi-lak app de das de Piezas l'asseste april 10,000 de Huts Pi-lak app de das de		~		-	vin Vin	vn. vn.				915	~	-	**
Pala	2006		automas.	09/03/0				And Advantions and Market and Advantion and	HUSTING BEING AN AND AND	Parate in second a first of control of Hubble Parate and the control of		~		-	NIL NIL	via via				915	~	-	14
Pala	2006	SCEXHOSOSCAX		09/6040				Chaire Harlan ECE 05-032-08;	HUISTI-MK 804-08-002-08 HUISTI-MK 804-08-002-08 HUISTI-MK 804-08-002-08	HURS PEAK ADD OF ONE OF		~	**	-	103	NB.				985		-	14
Paia	2006			0940340				Chaite Karlans 800-05-013-05; excluded hair 16/05	HUTS/TL4X (EDE-06-027-05) Chaine Karlann (EDE-07-022-05)	HURS FIGHT ADD ON ONE OF		~	14	-	923	NB.				985	~	82	**
Pele	2006	SCEXHOSOSCAX SCEXHOSOSCAX	euroneine.	0440340				Anished Anisa Dealer Hansan (2010) (2010) Anished Chan H./20 Dealer Hansan (2010) (2010) Anished Chan M. (2010) Anished Chan (2010) Dealer Hansan (2010) (2010)	HUST WERE AN OF ALL AND	Places I assessed a 2142 - 00-000 - 00 Hults PS-MK appl 00-000-00;		~		-	vin. vin	sm sm				-	2 2	2 2	
Pala	2007	6CEXH0505CAX	cammins - DN inductors 2008/7 - thus Harizon is DK	044040				activities bit IN metaled loss (H2B) practiceally excluded loss (Harison	Photos Readows AND CALOR AND HUTS/TS SAX able On COT CO; excluded from Harlash	Hunter Frederik and the date of a		2		-	NIL NIL	~					~		**
			Parane X						radiated from Harlase	Clearer Harson ECE (0) (CD (0) Huts Poly and CO (0) (CD (0) Huts Poly and CO (0) (CD (0))				_						-			
Peia	2007	6CEXH0505CAX	cammins - IPN indicates 2008/77 - thus Harlane's DK	094030				excluded loam/H2B) practice ally excluded loam/Harison	HUSS PS-Set all C-GB-CO ⁺ -CO ₁ multipled from Harizon	Dealer Harlan IDE 05:000-08; Dealer Langende IDE 30:000-01		-			983.					985	~	-	
Pair	2007	6CEXH0505CAX	cammins - IPN indicative 2008/07 - thus Harison 6.0K	094030				excluded loan H200; provisionally excluded loan Harison	HUISTINK (20-00-007-00) reliated from Harison	Charter Mariane #DE-05-050-06; Charter Mariane #DE-05-050-06;		~	**	-	NIL.					-	~		**
Pata	2007	SCEXH0505CAX	cammins - IPN indicative 2008/77 - thus Hariane is OK	014030				excluded loan:H2B; practiceally excluded loan:Harison	HUSS/S-40K #24-08-027-03; excluded from Harizon	Huts Phare and the date day Creater Harlaun ADE OT COD OR;		2		1	10.					***	5	a a	**
Pete	2007	SCEXH0505CAX	cammins - IPN indicative 2008/07 - thus	014030				excluded loan HUE	HUSS 75-50X 4DE-06-027-05; millioled from Harrison	HUSS PS-SIX ADDI OS-ODI-OS, Onuter Mariana BOE OD-CODI-OS,				-	10					915	~		**
Peie	2007	6CEXH0505CAX	camments - IPN indication 2008/07 - thus	0940340				exhaled bun H2E	HUSS/54X (DE-05-007-03)	Hunsel I second a strat. An Annual An Hunsel Phase and an Annual An				-	NB.							~	**
Pata		SCEXHOSOSCAX	Parker & CK	0940340				practice ally excluded from Marican	excluded from Harlase	HUS PARK ADD OF CO. CO.											~		
	2007		Harbor II. CK					excluded from H2Es provisionally excluded from Harison	HUSEPINE ADD-DE-DE-DE rectueled from Harison	Charter Market #28-05-052-06; Charter Longende #28-22-054-04		~		-	NB.	**				985			**
Pete	2007	6CEXH0505CAX	cammins - 17% indicators 2008/17 - thus Harison is OK	0140340				excluded loam/628) practiceally excluded loam/factors	HUSEPING ADD-DE-CO-CO rectualed from Harizon	Charles Harrison BCE (0) (CD-00) Charles Harrison BCE (0) (CD-00)		 ~		-	NEL	~				985	~		**
Pair	2007	6CEXH0505CAX	cammins - IPN indicative 2008/07 - thes Harlinet Is DK	0140340	_	I –		excluded loan H200; provisionally excluded from Harison	HUTE FEAK ADD - GE-COL-COL multipled from Harison	Auto Phane and a condition of the condit		 5		-	NEL	1	-	I –	-	-	2	8	
Pair	2007	6CEXH0505CAX	cammins - IPN indicative 2008/07 - these Harizon Is DK	0140340				excluded loan H2E; provinceds excluded loan Marian	HUSS 75-50X 4DE-06-027-05; millioled from Harrison	Halls PEAK ADD OF ONE OF, Device Harborn ADD OF COPOR;		~	**	-	103					-	~	-	**
Paia	2007	SCEXH0505CAX	cannols - IPN indicates 200M/F - thes	044040		1		excluded liam/H2Es	HUISTING ADD OD OD OD	Halls This and a STR. The Street A.				-	10					-	~	**	
Peie	2007	6CEXH0505CAX	Harison K DK sammins - 1711 Indicators 2008/17 - Unix	0140340				practice ally excluded from Harizon excluded from H220;		NUS 1546 401 04 000 01				-	*11			-			~		
			cammins - DN indicates 2008/Y - that Harlane is DK			+		practionally excluded from Harison	HUSSPEAK #20-00-002-05 milleded from Harlass	Crear Harbon 202 05 000 08; Crear Longente 202 22 000 01 Hubb PS-400 201 06 000 05;										815			
Peie	2007	SCEXHOSOSCAX	cummins - IPN industries 2008/V - Unit Marican Is CK	0940362				muladed bare H200; practice ally excluded bare Harizon	HUTS/TE-SAX #24-08-022-05; excluded from Harizon	Cruzze Harson #28-05-052-08;		~		-	10.					-	~	-	**
Pata	2007	6CEXH0505CAX	cammins - IPN indicative 2008/97 - thus Harlison 6: OK	094030		L		excluded loan H2B) practice algregisted from Harison	HUILING ADD - GO - CO- CO excluded from Harizon	Auto revenuelle de de de de Deute Marian ROE de de de de				-	NEL	~				-	-	-	**
Pair	2007	6CEXH0505CAX	cammins - 19% indicative 2008/07 - thus Harison is OK	0940340				excluded loan M200; provisionally excluded from Harison	HUSEPING ADD ON OZZION Included from Harlase	Hats 15 Million and the day of the second se		 -	**	-	NEL	-				-	-	2	
Pair	2007	6CEXH0505CAX	cannoles - IPN indication 2008/07 - thus Harizon Is OK	09-6540		1		mulated hum M226; anatomath mulated hum Marian	HUTS/TS-VAX #24-08-027-05; excluded from Harison	HURS PS-MIX and COLOR-OD; Church Harborn ADE OS CODOD:				-	823			1		955	~	-	
Peie	2007	6CEXH0505CAX	Harlane II. OK summins - 17% indicates 2008/97 - thus	014030		1		practiceally excluded from Harison excluded from Harison practiceally excluded from Harison	excluded from Harison HUSEPS-SK 454-06-027-09, excluded from Harison	Hard Print and the date of the		 		-	vii.								
			Harlane Is DK					practice ally excluded loan Harison excluded loan H202	excluded from Harison	Charter Longender #201 20-004 04 Hubb PS-Mit #201 08-006-00;										-			
Pele	2007	SCEXH0505CAX	Harborn DK	044530				practiceally excluded from Harbon		Deuter Harbard EDE 05 000 00; Deuter Lanzache EDE 15 00 00 00; HUEL 15 00; PT-00 00; 00		~	**	-	sin.			L		815	~	-	
Pete	2007	6CEXH0505CAX	cammins - IPN indicates 2008/9 - thus Harison Is OK	094030				excluded loan/H228; practionally excluded from Harizon	excluded horn Harison HUSERS KK ADE -05-002* 03; excluded horn Harison	Chaire Harbon 808-05-05006		~		-	NE	~				-	~		**
Peie	2007	6CEXH0505CAX	cammins - 17% indicators 2008/07 - thus Harison is OK	014030				excluded loan H220; practiceally excluded loan Harison	HUISTS NA ADE ON OZY ON multipled from Harlase	HUR PLAN ADD OR ODD ID; Dearer Harans ADE OD CODOR; Dearer Harans ADE OD CODOR;		5	1	-	×n.	-				-		2	**
Peie	2007	6CEXH0505CAX	cammins - IPN indicative 2008/9 - thus	0940340				multiple from M202	HUSEPING ADD-DE-CO-CO; rectualed from Harison	HURS PS-MIX and CO-ODE-OD; Onwer Hurston and CO-ODE-OD;		~		-	×n.			1		-	- 10		**
Peie	2007	6CEXH0505CAX	Harison Is DK sammins - IPN Industries 2008/V - Units Harison Is DK	09/03/0				practiceally excluded from Harison excluded from H220; providenally excluded from Harison	excluded from Harison HUSEPS-KK 404-06-027-00; excluded from Harison	Name and Address of the Address of t					100						~		
			Harborn CK			+		practice ally excluded from Harison excluded from H200		Crear Harbon 201-05-000-00 Crear Longente 201-02-001-01 Hutti 15-00-001-08-00-07-													
Pete	2007	6CEXH0505CAX	nammen, - IPN indicators 2008/9 - thus Harlinen is OK	044040				practionally excluded brancharison	HUSEPING ADD-DE-DE-DE- mailuded from Harison	Dearer Harson #28 05 05000		~		-	NIL.					985	~	-	
Pata	2007	6CEXH0505CAX	cammins - IPN indicative 2008/97 - thus Hisrieum is OK	014030				excluded loan H200; practice ally excluded from Harizon	HUTE FEAK ADD - GE-COL-COL multipled from Harison	Huts PLAN JOI OF GROWT, Dealer Harlan KDE GLODOS, Dealer Langeste KDE JULY		~		-	102	-				-	~*	~	~
Peie	2007	6CEXH0505CAX	cammins - IPN indicative 2008/17 - thus Harizon Is DK	014040				excluded loan H220; provisionally excluded loan Harison	HUSS 75-56K able -06-022-05; millioled from Harlison	Halls PEAK ADD OF ODE OF, Device Harborn ADD OT CODOS;		~		-	10.					-	~	**	**
Peie	2007	SCEXH0505CAX	cannols - IPN indicates 200M/F - thes	0940340		1		rechaired fram (1210)	HUSSING BELOW	Deate Longe & 201 20 20 20 21 Halls PLAN 201 OF 201 201				-	10					-	~		
Pele		SCENESOSCAX	Harison & DK summins - IPN indicates 2008/97 - Units	044030				practiceally excluded least Harison excluded least Haris		HUSE PLAN AND AN AND AN AN AN				-							~ ~		
	2007		Harborn CK					practiceally excluded transferious	HUSS FE-SIX 4DIE -08-002*-05; recitaded from Horizon	Charles Hardware (CE-05-052-06)		~	na Alfrederica des		*83			l		***	~	82	**
Shy Traik	2007	7CEXL0275.AMS	cummins - check EFN	09/03/0				HUSS F5 4K 4DE -DE -DE -DE -DE ; Chaine Karlans 8DE -DE -DE -DE;	HUSS 75-56K #24-58-502-05; Chaster Hussan #250-05-022-00;	No Longer has an eligible device	Bill could not be also a compatible device	~	ECE Gorella would be a	-	10	-	**		~	**		-	103
By Task																							