

Response to Andy Caldwell Vandenberg Article Regarding APCD

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Caldwell Statement: “The most recent example is one where the APCD refused to flexibly accommodate delivery, transportation, and installation of some very large, expensive, and mission-critical fuel holding tanks for the new Vulcan launch program.”

District Response: In general, APCD does not permit construction activities, including delivery, transportation and construction of fuel tanks. Accordingly, we have not placed any restrictions on the delivery and transportation of the fuel tanks associated with the ULA Vulcan project. We do permit the ongoing operation of the fuel tanks and the associated emissions control equipment, and that permit is currently in process and on track to be issued soon. It should be noted that ULA has indicated to the APCD that the permit will be issued in time for them to meet their desired construction timelines, and recently ULA requested a 90-day extension to the permit issuance timeline to review their own confidentiality claims (note – the permit is ready to be issued in draft form and APCD staff is awaiting ULA claims before it is issued).

Caldwell Statement: “The APCD is tying up the project in red tape as it pertains to the emissions from the barge while it is off our coast. One restraint imposed by the APCD would require the barge to return to the harbor in Ventura in the event it is unable to dock at Vandenberg on the scheduled day due to bad seas or uncooperative tides. The argument is that exhaust from the boat adds to the emissions by idling offshore. In past situations like these, boats have been allowed to wait offshore near Vandenberg until weather and tides were more cooperative, saving the cost of fuel.”

District Response: As stated above, in general, the APCD does not permit construction activities, including any barge utilized in delivery and transportation of fuel tanks. We have not put any restraints or conditions on any aspect of barge operations for construction/installation of the fuel tanks associated with ULA’s Vulcan project. There is no APCD requirement to return to harbor in the event a barge is unable to dock at Vandenberg. We do permit routine operations of oceangoing vessels used to deliver rockets to Vandenberg Harbor, and in all cases the operator/applicant has permitted their preferred routes and contingency measures; the APCD does not specify or require a specific route – it’s up to the applicant to determine how best to navigate the waters for their operations. We note that ULA has had an APCD permit for boat operations for more than 20 years and has indicated no modifications to their current boat permit are needed for their Vulcan project.

Caldwell Statement: “The APCD is also trying to make a big deal about the emissions from heavy-duty equipment used in the delivery and installation process like trucks and cranes. The submittal and approval process for permits are arduous and lengthy, and they can take months to receive approval, meaning mounting time and opportunity costs. These delays ripple throughout the entire program by bumping and shifting priorities, while putting the entire program at risk.”

District Response: In general, APCD does not permit construction activities, including trucks and cranes associated with delivery and installation processes. No APCD permit is required for any truck, crane or other construction equipment associated with any aspect of ULA's Vulcan Project.

Caldwell Statement: "It is hard to believe the emissions' tradeoff between idling offshore or the back-and-forth to Ventura is worth the added effort and cost. This is only one example of the unreasonable regulatory overreach exerted by the APCD."

District Response: Again, in general, APCD does not permit construction activities, including delivery, transportation and construction/installation of ULA's Vulcan project fuel tanks, and has not placed any restraint or condition on any aspect of barge operations for the project. The author (incorrectly) claims this is one example of regulatory overreach by the APCD, but does not provide any additional examples.