

Updates to the Rule 2305 Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

Adopted in 2021, SCAQMD Rule 2305 applies to owners and operators of buildings that have 50,000 square feet or more of indoor floor space in a single building used for warehousing activities.

The Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program requires that all trucks coming and going to the warehouse are counted, reported, and offset by mitigation fees or by implementing clean technologies.



The EPA has now made this rule federally enforceable which means higher penalties for non-compliance.

Thousands of warehouses are anticipated to be subject to this rule. Over 200 facilities have received Notices of Violation and additional enforcement actions are currently underway. In just three months, AQMD has collected approximately \$260,000 in fines from 30 facilities, with hundreds more expected to face penalties soon. Compliance with indirect source rules is a top priority for environmental justice communities and state-level goals to reduce emissions from the transportation sector have also increased the rule's visibility.

Annual WAIRE Reports for all warehouse phases are due by January 31, 2025.

It's essential that facilities have a system in place now to collect the required truck trip data for reporting that includes differentiation of the type of truck, either Class 8 or Class 2b-7.

Custom WAIRE Plans must be submitted by May 31, 2025.

A Custom WAIRE Plan allows warehouse operators to propose their own set of actions to earn WAIRE points for compliance, beyond the pre-approved options listed on the WAIRE Menu. The standard method involves earning points through actions such as installing and using electric vehicle (EV) charging stations, acquiring zero-emission vehicles, or implementing solar panels and hydrogen fueling systems. However, if a facility's planned activities fall outside these predefined actions, a Custom WAIRE Plan provides the flexibility to propose alternative measures that still achieve the goal of reducing emissions. This approach is ideal for warehouses with unique operations or innovative projects that aren't directly covered by the WAIRE Menu. Once approved, the actions in the plan can be used to earn WAIRE points that contribute toward meeting your compliance obligation for the 2025 calendar year, which is reported in 2026.

How NV5 Can Help

We help our clients assess rule applicability, comply with reporting requirements, and develop sustainable compliance management programs to reduce costs and minimize impacts on business operations.

Reporting

- WAIRE POP
- Annual Reporting

Custom WAIRE Plan Preparation

- WAIRE Point Quantification
- Cost Effectiveness
- Feasibility Studies

Tracking Tools

- Truck Trip Counting & Recordkeeping
- Compliance Cost Forecasting