

Operational Statement

Item 9.2

WestAir Gases is a family-owned business that started in 1970 within the San Diego area. WestAir has an exemplary safety record within the compressed gas industry for over 56 years.

WestAir repackages pure atmospheric gases and gas mixtures in DOT rated cylinders and containers.

WestAir currently repackages propane cylinders manually into DOT rated cylinders.

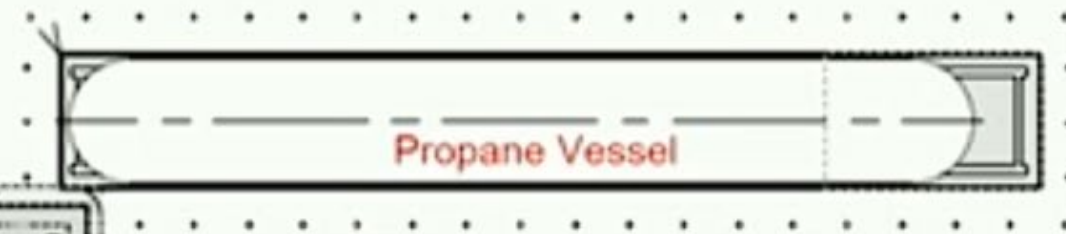
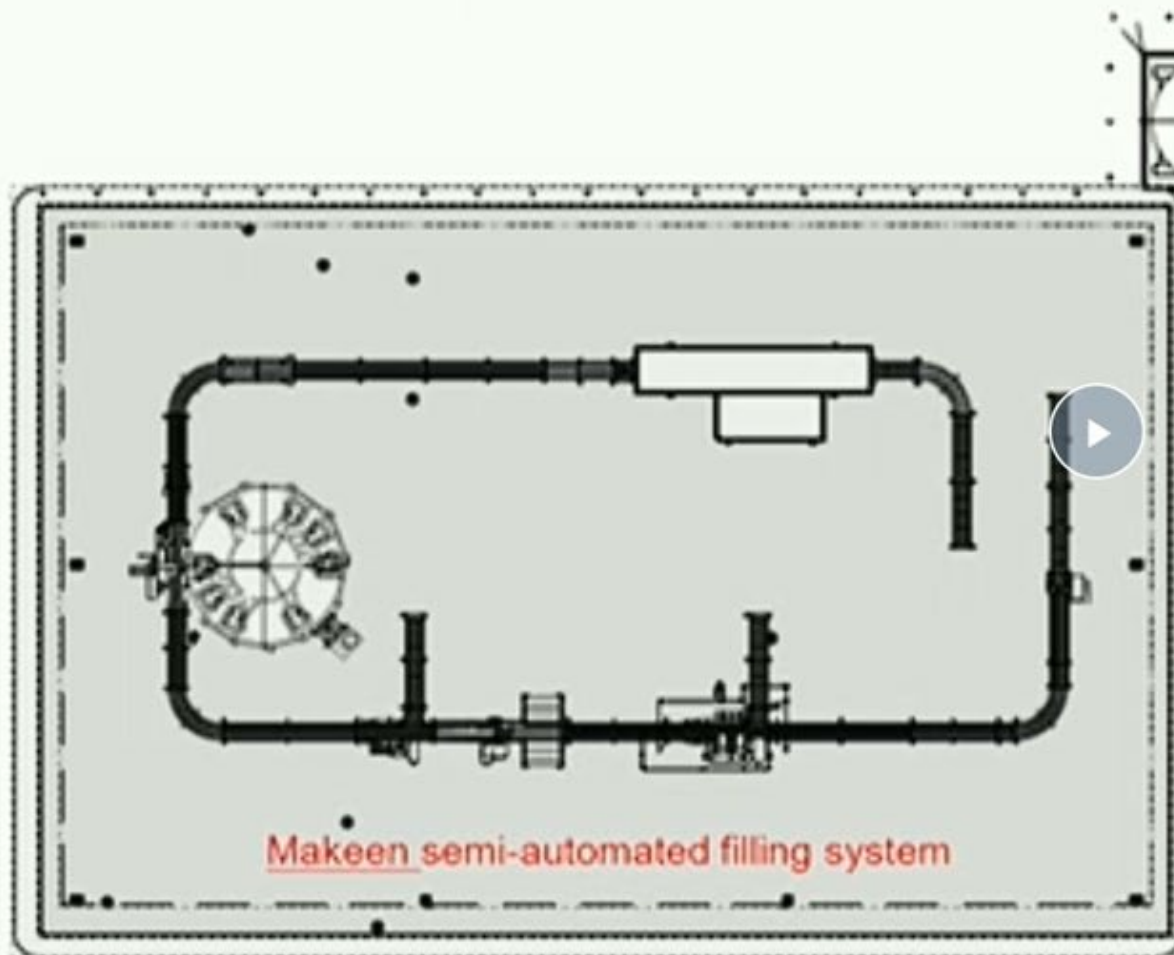
This project proposes the construction of a 4,000 square foot three-sided metal building to repackage propane cylinders.

Project Details

- The proposed projects is located at 2100 Haffley Ave. in National City, CA
- WestAir plans on filling and storing small barbeque sized propane cylinders from a single 30,000-gallon propane storage vessel.
- The proposed Makeen propane carousel will be a semi-automated weight-based filling system that will increase production within this process.
- Propane cylinders once refilled will be transported on WestAir vehicles to direct customers.
- The propane storage vessel was manufactured from carbon steel and meets the NFPA 58 (Liquified Petroleum Gas Code), OSHA 1910.110 and CalOSHA 8 CCR Div. 1, Chapter 4, Subchapter 1, Article 5 requirements.

Project Details

Propane vessel and semi-automated filling system locations



The propane equipment is engineered and manufactured by Makeen Energy which employees approx. 4,000 people across 6 continents and operate in over 140 countries.

Multiple Makeen semi-automated filling systems have been installed in many states within the US which are safe and reliable.

Facility Layout





 Entrance

 Tank

 Bollards

WestAir Gases
2100 Haffley Avenue
National City, CA

* Locations approximate

Propane will be delivered by bobtail truck approximately once every two weeks.



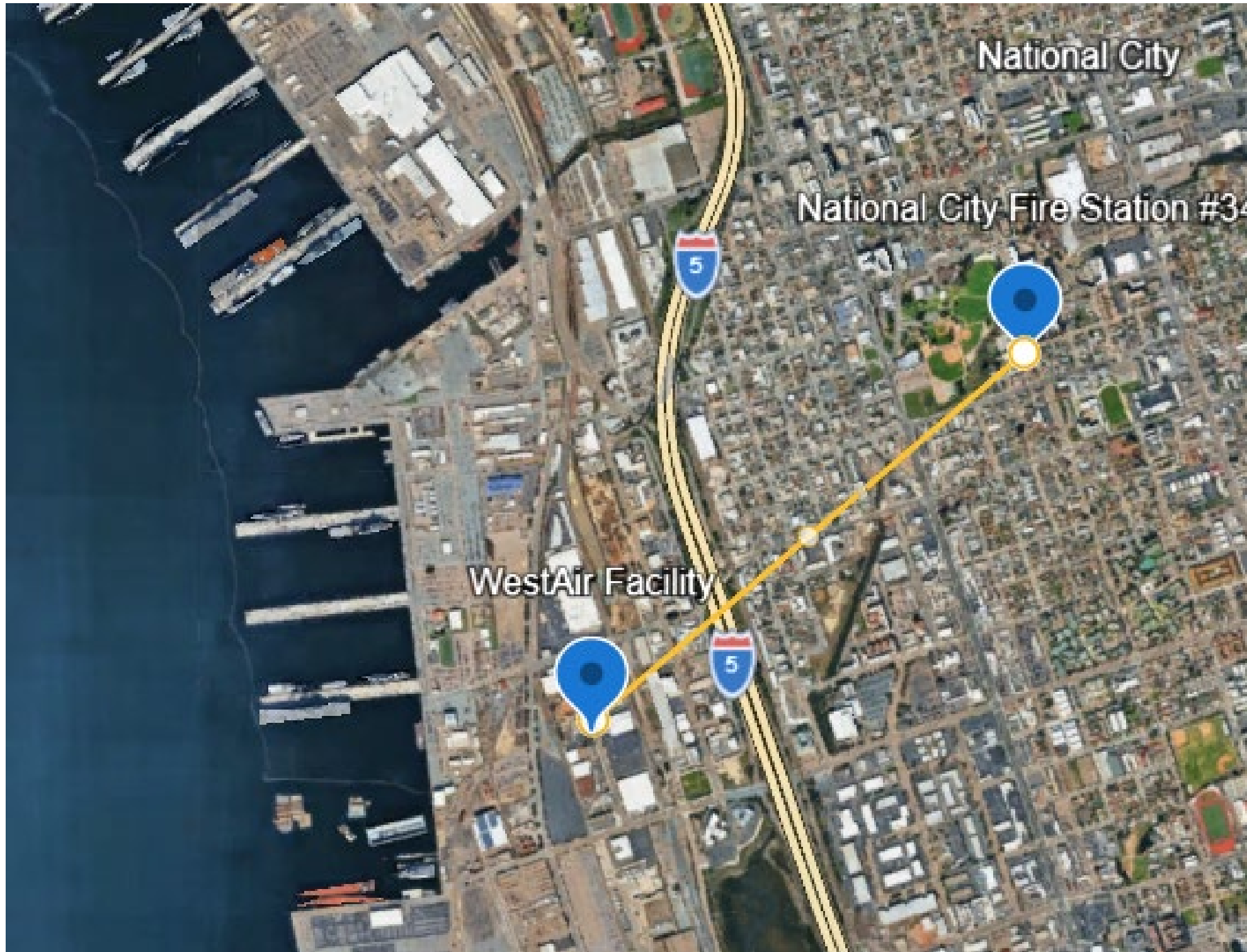
Safety features of the LPG tank include:

- Pressure relief valves
 - PRVs are designed to vent excess pressure to prevent tank rupture
- Excess-flow valves
 - Designed to close automatically if flow during transfer exceeds the rated capacity of system
- Emergency shutoffs
 - Immediately stops the flow of LPG
- Level gauges
 - Indicate the amount of LPG in the tank to prevent overfilling

Safety features continued:

- Transfer procedures
 - WestAir has written transfer procedures that all operators must follow
 - Procedures will be updated with specific information after the equipment is installed
- Separation distances
 - CA Fire Code specifies minimum distance between tanks and buildings, property lines, and other LPG containers
- Trained operators
 - All WestAir operators receive initial and ongoing safety training including computer-based training and Job Site Observation

Nearest Fire Station



NCFD Station 34 is 1.3 miles from the WestAir facility

From the National Propane Gas Association:

There are approximately 10,000 LPG facilities with storage tanks between 18,000 – 30,000 gallons in the United States.

Number of Bulk LPG Tanks in California:

There is no public database that lists the exact number of bulk LPG tanks in California, however:

- WestAir currently operates two facilities with 30,000-gallon LPG tanks (Oceanside and Garden Grove)
- There are several bulk LPG tank facilities in San Diego County including:
 - Ferrellgas
 - Airgas
 - AmeriGas
- The state's regulatory agencies - including Cal/OSHA, CAL FIRE, and local Certified Unified Program Agencies (CUPAs) - track and inspect these tanks.

Regulatory Oversight

The CUPA for the WestAir National City facility is the San Diego County Department of Environmental Health Hazardous Materials Division and is responsible for

- Hazardous Materials Business Plans
- Facility Inspections focusing on hazardous material storage and recordkeeping

The National City Fire Department is responsible for

- Plan Review and Permitting
- Facility Inspections focusing on equipment and operations
- Emergency Response

WestAir will prepare and submit a Hazardous Materials Business Plan prior to the tank installation.

The National City Fire Department has already reviewed and approved the permit application for the tank.

The permit number is FD25-00101

Summary of Safety Features

- Design standards-Tank/system designed, installed, inspected, and maintained under NFPA 58, CA Fire Code, Fed & CalOSHA LPG rules, county/local requirements.
- Built-in safety layers-Pressure relief valves, excess-flow valves, shutoffs, gauges, transfer procedures, separation distances, odorization, ignition control, trained operators.
- Emergency response-Fire station ~1 mile away; several within 5 miles; pre-planning with fire department; site access; shutoff/isolation steps; evacuation/shelter decisions.
- WestAir safety record-No prior incidents; trained personnel; documented inspections; maintenance logs; emergency drills.
- Community commitments-Annual fire department walkthrough, updated emergency contact sheet, complaint line, documented inspections, signage/access control. WestAir has been in National City since 2007.

Public Comment 04/07/2026



- A public comment was received concerning the potential risks associated with a Boiling Liquid Expanding Vapor incident or a BLEVE.
- BLEVE incidents are the result of catastrophic tank failure typically caused by a fire and over-pressurization of a tank.
- The proposed tank was designed and manufactured specifically to prevent BLEVE incidents.
- Design features include reinforced steel, pressure relief valves, emergency shutoffs, and corrosion protection coating.
- The tank and associated piping will be protected from vehicle impact by concrete bollards.
- Should a fire occur, the WestAir facility is within 1.3 miles of a National City Fire Station and within ~3 miles of:
 - NCFD Station #31
 - NCFD Station #33
 - Federal Fire San Diego Station #17
 - Chula Vista Station #1
- Coordination with emergency responders is required as part of the Hazardous Materials Business Plan submission process.

Conclusion

- WestAir recognizes the hazards associated with LPG and has established safety procedures to minimize risks to the public, our employees, and first responders.
- WestAir takes safety seriously and has not had any incidents resulting in fires or explosions.
- The tank installation is in compliance with the CA Fire Code, NFPA 58, and San Diego County Municipal Code.
- The plans have been reviewed and approved by the National City Fire Department.
- Approval of this project is appropriate because the tank is regulated, engineered with multiple safeguards, and supported by emergency response planning.