



# MONTEREY BAY

Unified Air Pollution Control District  
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER  
Douglas Quetin

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November 8, 2006

Clerk of the Board  
California Air Resources Board  
1001 I Street 23<sup>rd</sup> floor  
Sacramento, CA 95814

**Re: Comments Regarding the Proposed Amendments to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines**

The Monterey Bay Unified Air Pollution Control District appreciates the opportunity to comment on the proposed amendments to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines. We support the ongoing efforts of the California Air Resources Board in reducing the emissions of this toxic air contaminant. We believe the following concerns need to be addressed to effectively and fairly impose regulatory requirements on stationary diesel engines.

The Control Measure Should Only Regulate Diesel Particulate

This regulation is being developed under the October 2000 Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. The regulation to reduce diesel particulate should not be used for regulating hydrocarbons, oxides of nitrogen or carbon monoxide. Regulation of these criteria air contaminants should be through the California Clean Air Act/All Feasible Measures (AFM) process and district new source review programs. We strongly believe that reductions in criteria air contaminants should be imposed only as needed through the proper regulatory mechanisms and should be removed from this regulation.

Outreach to Affected Individuals

Effective outreach is needed to make sure the individual owners of engines subject to this regulation are made aware of its requirements. In the past agricultural operations have not been regulated by most air districts which makes this a difficult task, but important nonetheless. Outreach should include not only informing the regulated community of requirements, but also during the development of these regulations.

We look forward to working with your staff on an ongoing basis to effectively implement this regulation.

Sincerely,

Douglas M. Quetin  
Air Pollution Control Officer

cc: Catherine Witherspoon, Executive Officer

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