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COUNTY OF MENDOCINO
BOARD OF SUPERVISORS
501 Low Gap Road • Room 1090
Ukiah, California 95482

October 17, 2006

Mr. Robert Fletcher, Chief
Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Subject: Proposed ATCM Amendments for In-Use Agricultural Engines

Dear Mr. Fletcher:

The Mendocino County Air Quality Management District Board would like to provide comments on the proposed amendments to the Air Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines (CCR 93115) to address in-use agricultural engines.

The District Board appreciates the California Air Resources Board's efforts to protect public health from toxic air pollution and its willingness to receive input from local communities impacted by the proposed regulation.

The District Board is concerned that the proposed amendments will impose an undue burden on the agricultural industry, consume limited District staff resources, and includes items which are not appropriate for an ATCM.

In particular, the District Board provides the following comments:

- The requirement to replace or retrofit an in-use engine should only apply if an engine poses a demonstrated health risk to the public.
- The District Board supports an exemption for remotely located and/or low use engines, provided there is no evidence of a demonstrated health risk to the public.
- The District Board does not support the use of the ATCM to control criteria pollutants. The purpose of an ATCM is to address emissions of toxic air contaminants. Regulation of criteria pollutants is more appropriately done through the normal regulatory process.

- The ATCM should not apply to compression ignition engines using B100 or other non-petroleum based fuels – unless studies show a documented health risk from such fuels.

- The District Board supports a registration program, as opposed to mandatory permitting, to facilitate implementation of the ATCM.

Please contact the District office at (707) 463-4354 if you have any questions regarding this correspondence.

Sincerely,

J. David Colfax, Chair
Mendocino County Air Quality Management District

cc: Catherine Witherspoon, ARB Executive Officer
Sacramento Valley BCC
North Coast Unified AQMD
Lake County AQMD
Northern Sonoma County APCD