

**ARB Discrete Early Action Measures
as proposed by
the Environmental Justice Advisory Committee on the Implementation of the
Global Warming Solutions Act of 2006**

Number	Description
1	Improved landfill methane capture
2	Require HFC-134a reductions through evaluation of refrigerants in de-commissioned or stored cargo containers, commercial and residential HVAC system leakage, auto dismantling/crushing facilities (i.e., requiring HFCs be removed from cars prior to scrappage)
3	Manure management ¹
4	Reduce venting/leaks from oil and gas systems
5	Heavy-duty vehicle emissions, efficiency improvements ²
6	Cool automobile paints ³
7	Port electrification
8	Transportation refrigeration, electric standby
9	Truck stop electrification with incentives for truckers
10	Tire inflation program
11	Require low GWP refrigerants for new MVACs ⁴
12	Add AC leak tightness test and repair to Smog Check
13	Wafflemat system for concrete slab foundations
14	Demonstrate use of shoreside generators as bridge to electrical hook-up
15	Green ship incentive program
16	Anti-idling requirement for cargo handling equipment at ports
17	Require the electrification of airport ground support equipment
18	Require the electrification of construction equipment at urban sites
19	Adopt a regulation and or incentive program to take advantage of emerging hybrid technology for medium duty delivery trucks
20	Relatively inexpensive energy savings measures with short pay back times for cement industry
21	Explore a greenhouse gas and mercury emission performance standard for cement facilities equivalent to the level achievable through conversion from coal to natural gas
22	Relatively inexpensive energy savings measures with short pay back times for fossil fuel power plants built prior to 1980 ⁵
23	Relatively inexpensive energy savings measures with short pay back times for refineries ⁶
24	Accelerate the replacement of cargo handling equipment at ports ⁷
25	Enclose dairy barns to capture methane ⁸
26	Adopt South Coast and San Joaquin rules on enclosed composting facilities statewide ⁹
27	Establish necessary rules and or emissions thresholds for transmission to local Air Districts for the phase out, by 2010, of power plants built prior to 1980 that generate over 100 MW of electricity and provide incentives for clean energy production in their place ¹⁰
28	Prohibit fuel oil burning for base load generation of electricity in facilities 100 MW or greater and built prior 1980 ¹¹
29	We recommend CARB undertake and adopt regulatory measures that require recycling of waste gases at refineries instead of dumping or incinerating them ¹²
30	Adopt regulatory measures to eliminate the methane exemptions granted to refineries and require methane control measures at refineries ¹³

31	Identify and implement energy efficiency measures at refineries that include, but are not limited to, conducting an energy audit. This audit shall consider and address, at least: a) Use of clean, renewable energy for refinery electricity consumption b) The impact of heavier crude oil modifications on GHG emission c) Other energy efficiency measures ¹⁴
32	We recommend CARB undertake and adopt regulatory measures that require recycling of waste gases at oil production sites instead of dumping or incinerating them ¹⁵
33	Adopt regulatory measures to eliminate the methane exemptions granted to oil production sites and require methane control measures at oil production sites ¹⁶
34	Identify and implement energy efficiency measures that include, but are not limited to, conducting an energy audit at oil production sites. This audit shall consider and address, at least: a) Use of clean, renewable energy for oil production site electricity consumption b) Other energy efficiency measures. ¹⁷

Early Action Measures to be Forwarded by ARB to the CAT Team

The Committee recommends that all CAT agencies with jurisdiction in the area of energy generation, procurement, siting, permitting, rate-setting and renewable energy deployment in both electricity and transportation sectors, conduct the following:

- 1) Quantify and publicly provide the air emission and cumulative impacts of new power plant construction in CA and report to CARB the implications for the achievement of the state's climate and air quality goals;
- 2) Require proponents of new power plant construction to conduct a thorough and robust renewable energy alternatives assessment. If a more carbon-beneficial combination of energy producing or saving sources is available, then the utility should be required to pursue that avenue. This process should begin with all currently approved and expected power plants;
- 3) Report to CARB on the progress of existing renewable energy deployment programs and identify obstacles to the achievement of the state's renewable energy goals;
- 4) Perform an audit, to be publicly available, of existing and planned low-income rate assistance, energy efficiency, solar, and green building programs and identify barriers that impede local community participation.

Note: The Committee supports electrification of engines when coupled with efforts to increase use of clean, renewable energy sources such as wind and solar.

¹ During the development of this measure ARB must identify methods that would eliminate the NOx emissions which result from this technology in order to comply with the prohibition in AB 32 against backsliding on criteria pollutants.

² Particularly promising avenues include requiring or incentivizing: Use of wide base tires, Use of automatic tire inflation systems, Use of low viscosity lubricants, Improving freight logistics, and Pursuit of hybrid truck technology. ARB should undertake a complete life cycle analysis before suggesting use of fuel additives.

³ Any regulation developed would have to ensure that the new paint formulations did not cause backsliding on criteria pollutants.

⁴ Any chosen replacements must first undergo a complete life cycle analysis and multi-media toxicity analysis.

