

BEFORE THE AIR RESOURCES BOARD
OF THE STATE OF CALIFORNIA

Testimony of Curt Josiassen	}	Public Hearing Item 06-10-5
Chair, Sacramento Valley Basinwide . }		November 16, 2006
Air Pollution Control Council	}	Proposed amendments to the Airborne
Presented on behalf of the member..... }		Toxic Control Measure for Stationary
districts	}	Compression Ignition Engines

Dr. Sawyer and distinguished members of the California Air Resources Board, I am Curt Josiassen. I am here today as Chair of the Sacramento Valley Basinwide Air Pollution Control Council to comment on the proposed amendments to the ATCM to incorporate requirements that reduce diesel particulate emissions from in-use engines used in agricultural operations.

My strong agricultural and public service background gives me a unique perspective on the proposed amendments. I am a lifelong resident of Butte County and a fourth generation rice grower. I have a bachelor's degree in Agricultural Business from Cal Poly, San Luis Obispo. I am also well versed in air pollution control regulations and in the development of public policy to protect public health and our natural resources. I currently serve as the Supervisor for District #4 for the County of Butte. I also serve on the Board of Directors for the Butte County Air Quality Management District and have done so since I was elected to office in 1996. In my capacity as a Supervisor, I served as the Chair of the California State Association of Counties Agricultural and Natural Resources Policy Committee. I am also one of two northern California voting representatives on the Board of the Northern California Water Association.

Today, I appear before you to convey the comments and concerns expressed by the Council member districts, as presented in our letter of November 1st.

I preface my comments on the proposed amendments to the ATCM by thanking your staff for their efforts to craft regulations that seek to reduce public exposure to airborne toxics. The Council supports workable, cost-effective measures to reduce public exposure to airborne toxic pollutants. In this vein, the Council provides the following comments:

1. The requirement to replace or retrofit an engine should only apply if an engine poses a demonstrated health risk to the public.

2. Along this line, the Council supports an exemption for remotely located/low use engines that do not pose a significant risk to the public. We do not support limiting the exemption to districts that are in attainment with the federal ozone and particulate matter (PM) ambient air quality standards. Measures to attain the federal ozone and particulate standards should be implemented through the SIP planning process.
3. The emission standards for in-use agricultural engines are different than the standards for non-agricultural engines. We understand that this is because of concerns related to criteria pollutant emissions. The Council does not support the use of the ATCM to control criteria pollutants. The ATCM should only be used to control toxic air contaminants. The standards and compliance options for in-use non-agricultural engines should also apply to agricultural engines.
4. The ATCM should only apply to compression ignition engines using diesel fuel blends. The ATCM should not apply to compression ignition engines using 100% biodiesel (B-100).
5. The Council supports CARB development of a model registration program to facilitate implementation.
6. The ATCM should not be used to address the requirements of the AB 2588 Air Toxics "Hot Spots" Program.
7. Depending on the use, an individual engine may be subject to the portable equipment ATCM or stationary engine ATCM. Compliance standards and timelines may be different. The requirements for these two regulations should be harmonized.
8. Even though CARB and local district staffs have completed outreach to the agricultural community, the Council is concerned that many engine owners are still unaware of the proposed regulation. Also, there will be a very limited period to utilize the Carl Moyer grant funding, with only one more year of funding available for stationary agricultural engines. No funding is available for the staff time necessary to complete the outreach efforts. In order for the program to be successful, more time is needed for outreach. The recent industry concerns with the portable equipment program illustrate the importance of adequate outreach. The Council requests that action be continued to a later date to allow more outreach and participation by the agricultural community.

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2 I ask that you honor our request to incorporate the comments as outlined above, and
3 that you defer action on this matter until additional outreach to the regulated
4 community has been completed. The Council also requests your Board consider the
5 comments submitted by member air districts.

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7 Thank you for attention in this matter.
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9 Respectfully submitted as testimony before the California Air Resources Board for the
10 November 16, 2006 Public Hearing to consider the proposed amendments to the
11 Airborne Toxic Control Measure for Stationary Compression Ignition Engines.
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Dated: November 16, 2006

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16 Curt Josiassen, Chair
17 Sacramento Valley Basinwide Air Pollution Control Council
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