

Alvin Valeriano

Thank you very much for this opportunity to express my views on why 07-11-4 attainment of the 8-hour ozone standard can occur by 2017. My name is Alvin Valeriano. I am a resident of Fresno City. I worked with Dr. James Lents and Nicole Davis of the International Sustainable Systems Research Center, which provided invaluable technical analysis for earlier attainment of ozone standards in the San Joaquin Valley. Prior to this, I worked with the San Joaquin Valley Air Pollution Control District for 4 and ½ years as Senior Air Quality Specialist in rule and plan development.

When this board was deliberating to approve the San Joaquin Valley 2007 Ozone Plan, it appeared that there was no other choice but to go to Extreme status with a 2024 attainment because it was not technically feasible to have earlier attainment. At that time, the attainment gap was 300 TPD in 2012, 100 TPD in 2020, and 83 TPD in 2023. Today, thanks to additional reductions that the state board (your board) found and committed to, approximately 26 TPD, we are much closer to clean air in the valley. ARB was able to find more reductions, despite the initial assessment that it was not possible. ISSRC's research findings revealed that there were significant inventory adjustments that were overlooked, approximately 40 TPD of NOx. In addition to inventory adjustments for heavy-duty diesel trucks, all of these have drastically reduced the attainment gap.

We believe that with current technology, the attainment gap can be closed and that we can attain the ozone standard by 2017.

Here's a summary of current technologies.

As you can see, these technologies are being successfully used in many sources. The challenge now is to follow the "All Feasible Measures" mandate of the California Health and Safety Code, which directs planning efforts to evaluate how current technologies can be applied to more sources.

In June, you heard that technologies were not yet available for an earlier attainment of the ozone standards. We respectfully disagreed with this assessment then. Now that the attainment gap is much narrower, we believe, even more strongly, that current technology is cost-effective and sufficient to get us into attainment of the 8-Hour ozone Standard by 2017. Please extend the Task Force process and direct ARB staff to fully evaluate the potential of these technologies. Thank You.



POLLUTION SOURCES	CONTROL TECHNOLOGY	COST-EFFECTIVENESS	AVAILABILITY STATUS
Glassmaking	SCR	\$3,000 - \$4,000/ton	One in Valley, several in Europe & Japan
IC Engines	SCR, Electrification	\$6,000-\$7,500/ton @3,000 hrs	Achieved-in-Practice BACT
Dryers, Ovens, Dehydrators	Low-NOx & Ultra Low-NOx Burners	\$4,000 - \$13,000/ton	Achieved-in-Practice BACT
Big Boilers	SCR & Low-NOx Burner + SCR	\$4,000 - \$13,000/ton	Achieved-in-Practice BACT
Small Boilers	Low NOx & Ultra Low NOx Burners	\$4,000 - \$13,000/ton	Achieved-in-Practice BACT
Solid Fuel Boilers	SNCR, SCR & SNCR followed by SCR	\$3,000-\$12,000/ton	SCR applied in 20 MWF in Europe & Japan
Trucks, Tractors, Construction Equipment	SCR with DPF	\$6,000-\$7,000/ton	Euro 4 & 5 Standards met with SCR

CARL MOYER CURRENT COST-EFFECTIVENESS THRESHOLD = \$13,600/Ton of NOx

**CONCLUSION: TECHNOLOGIES FOR 2017 ATTAINMENT OF THE 8-HOUR OZONE STANDARD ARE AVAILABLE AND COST-EFFECTIVE.**

*Alvin Valeriano*