

07-6-2
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Summary of Top 3 Suggestions for Accelerating Clean Air for the San Joaquin Valley

1. **Consider the value that retrofit technology can play in improving air quality in the Valley.** Retrofit technology for diesel engines is available today and is advancing rapidly. Between now and 2018 (more than ten years), it is reasonable to expect that retrofit technology to reduce NOx emissions by 80% will be available for virtually every type of equipment in the Valley at a small fraction of the cost of new equipment *if proper stimulus is provided*. The district staff is currently not looking at retrofits as a control option. Instead, they are relying on the vastly more expensive strategy of buying new equipment.
2. **Use Clean Air Days as an operational control approach to significantly reduce emissions on high pollution days and act as a stimulus for the replacement or upgrade of old polluting equipment.** By 2018, with the controls proposed by the District staff, the number of days violating clean air standards will be considerably reduced to around 30 days per year. The district and ARB are currently not looking at mandatory Clean Air Days as a control option.

These two items could be the basis for the following rule:

- Allow for only the operation of Tier 4, electric, or retrofitted engines with an 80% efficient retrofit device on high pollution air days for:
 - On-road heavy duty trucks
 - Off road equipment and tractors
 - Stationary Agricultural pumps.
 - Recommendation is much more stringent than the proposed district rules. The rule above would achieve emissions reductions of up to **80%** (or 150 t/d NOx from baseline).
3. **The District has failed the Valley and adopted largely meaningless rules, many of which ignore the benefits of controlling VOC in the Valley.** More health-protective rules (such as in the SCAQMD and BAAQMD) are available today to reduce both NOx and VOC emissions much further from existing sources, for example:
 - **Confined Animal Facilities (CAFs):**
 - Emissions can be controlled up to 75% for most sources
 - District proposes to control to around 30%
 - Extra 18 t/d VOC reductions are available to the District by:
 - redefining the term "large" to include most CAFs, or implement regulation for 'medium' CAF to ensure most (>90%) of emissions from CAFs are controlled;

- increase the stringency of BARCT – there are many demonstrated controls available for reducing emissions from animal facilities that the District is currently not encouraging or requiring.
- Based on District rules, over half of the ‘large’ CAFs will not need to implement any changes to their current activities and none of the poultry facilities will need to apply any changes.

Viable control options include: collecting and treating liquid manure and leachate through available techniques, such as anerobic digester. This measure is considered one of the preferred and most cost effective measured by the South Coast.

- **Composting and Biosolids:**

- VOC emissions can be controlled up to 85%
- District proposes between 0-25% control, stating no rule adoption should occur before 2020.
- Up to 45 t/d extra VOC reductions are available if the District required existing facilities to fully enclose their facility and reduce emissions by 85% of baseline or demonstrate an alternate equivalent compliance plan, with compliance beginning 24 months from date of adoption.

The South Coast passed a rule that requires new and existing facilities to fully enclose their facility and to reduce emissions by 70-80% of baseline emissions or to demonstrate an alternative equivalent compliance plan.

- **Oil Refinery Flares:**

- Emissions can be controlled much further if the Valley adopts rules like those in the Bay Area and South Coast, as recommended by ARB.
- ARB also suggested that the District add provisions for emergencies, but the District stated that the rules do NOT apply to emergency flares.

The Bay Area and South Coast have developed flare rules that include developing and implementing Flare Minimization Plans. The Bay Area prohibits flaring unless it is consistent with the approved FMP submitted to the APCO.

- **Glass Furnaces:**

- NOx emissions can be controlled up to 55% for flat glass and 25% for container glass, if ARB recommended regulations (similar to those adopted by other districts in the state) were adopted by the District
- The District rule would only apply to stationary sources that emit at least 10 tons per year of either NOx or VOC starting in March 2008
- The District’s own draft staff report admitted that the emission limits in the rule were already being met by all affected sources – making their rule meaningless.

Limits on NOx Emissions for Glass Furnace Operations

	ARB Recommended Rule	District Rule
Flat Glass	5 lbs per ton NOx	9.2 lbs per ton NOx
Container Glass	3 lbs per ton NOx	4 lbs per ton NOx

Adding Insult to Injury

At the April 30th public hearing on the region's ozone plan, the District Staff repeatedly stated they could not do more to reduce ozone pollution. Yet, at their very next hearing (just weeks from the April 30th hearing) the District Staff proposed to make several exemptions to the Open Agriculture Burning Rule required of them by State law. Furthermore, they failed to request ARB's concurrence before making the exemptions.

- **Open Agricultural Burning:**

- Emissions can be controlled an additional 472 tons of VOC per year.
- However, the District seeks to postpone the deadline for burning for approximately 40% of the emissions by exempting all citrus, apple, pear, quince, and fig orchards, and all orchards less than 20 acres in size.

SB 705 (Florez) was signed into law in 2003. The law stipulates that the SJV District must impose a prohibition on open agriculture orchard burning by June 2007. The District instead unilaterally makes exemptions for several agriculture industries without receiving the required concurrence from CARB.