

MEETING  
BEFORE THE  
CALIFORNIA AIR RESOURCES BOARD

BOARD HEARING ROOM  
CALIFORNIA AIR RESOURCES BOARD  
2020 L STREET  
SACRAMENTO, CALIFORNIA

THURSDAY, SEPTEMBER 26, 1996

9:40 A.M.

Nadine J. Parks  
Shorthand Reporter

## MEMBERS PRESENT

John D. Dunlap, III, Chairman  
Eugene A. Boston  
Joseph C. Calhoun  
Lynne T. Edgerton  
M. Patricia Hilligoss  
Jack C. Parnell  
Barbara Riordan  
Ron Roberts  
James W. Silva  
Doug Vagim

## Staff:

Michael Kenny, Executive Officer  
Tom Cackette, Chief Deputy Executive Officer  
Mike Scheible, Deputy Executive Officer  
Kathleen Walsh, General Counsel  
Jim Schoning, Ombudsman

Terry McGuire, Chief, Technical Support Division  
Linda Murchison, Chief, Stationary Source Emission  
Inventory Branch, TSD  
Richard Bode, Manager, Emission Inventory Methods  
Section, TSD  
Carolyn Lozo, Staff, TSD  
George Alexeeff, OEHHA  
Judith Tracy, Staff Counsel, Office of Legal Affairs

Bill Loscutoff, Chief, Monitoring and Laboratory Division  
George Lew, Chief, Engineering and Laboratory Branch, MLD  
Cindy Castronovo, Manager, Testing Section, MLD  
Frances Cameron, Staff, MLD  
Diane Glazer, Staff Counsel, Office of Legal Affairs

Bob Cross, Assistant Chief, Mobile Source Division  
Jack Kitowski, Chief, On Road Control Regulations Branch,  
Mobile Source Division  
Fernando Amador, Staff, MSD  
Michael Terris, Staff Counsel, Office of Legal Affairs

John Holmes, Ph.D., Chief, Research Division  
Bob Barham, Assistant Chief, RD  
Tony Van Curen, RD

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1 experience I had yesterday. This has to do with the SIP.  
2 You kindly suggested and invited me to represent the Air  
3 Board at the test drive of the Ballard Fuel Cell II bus.  
4 And Supervisor Burke was there, and the head of MTA, and the  
5 president of Ballard, and the Mayor Los Angeles came by.

6 And what we all did was, at the end of the spoken  
7 comments was, we were all invited to toast this new fuel  
8 cell bus. And what we drank was the vaporized water from  
9 the fuel cell bus process. And so, while now, in my  
10 pleasure of serving on the Air Board has included reviewing  
11 the State SIP, reviewing the proposal to FIP and the SIP,  
12 sipping the FIP. And now, I have sipped the sip.

13 (Laughter.)

14 CHAIRMAN DUNLAP: Was it --

15 MS. EDGERTON: It tasted fine.

16 CHAIRMAN DUNLAP: It did?

17 MS. EDGERTON: And I'm still here. I'm alive.

18 But it was very interesting to be drinking the water from  
19 the engine. From the SIP.

20 CHAIRMAN DUNLAP: All right. Well, you seemed to  
21 be the right one to send to those events, Lynne.

22 (Laughter.)

23 CHAIRMAN DUNLAP: All right. Let's move on.

24 96-7-2. And again, I'd like to remind those in  
25 the audience that wish to testify on any item, please

1 provide the Clerk to the Board, Ms. Hutchens, 20 copies of  
2 any written comments.

3 This item is a public hearing to consider the  
4 amendment and adoption of regulations regarding stationary  
5 source test methods. And, as we know, good air pollution  
6 decisions are based on sound technical information, which  
7 includes accurate measurements of source emissions.

8 State law requires the ARB to adopt test  
9 procedures to determine compliance with ARB and district  
10 stationary source emission standards. And this item is part  
11 of our continuing effort, the continuing effort of the Board  
12 to update and improve the ARB source test methods, as well  
13 as make the methods more consistent with corresponding U.S.  
14 EPA approaches and methods.

15 So, at this point, I would like to ask Mr. Kenny  
16 to introduce this item and begin the staff's presentation.  
17 Mike?

18 MR. KENNY: Thank you, Chairman Dunlap and members  
19 of the Board.

20 Since the early 1980s, the Board has adopted 47  
21 stationary source test methods. These methods are used for  
22 determining compliance with district rules and also to  
23 evaluate the effectiveness of air pollution control  
24 equipment, support control measure development, and develop  
25 emission inventories.

1 Most of the ARB methods are developed for use in  
2 the ARB's State regulations, such as the air toxic control  
3 measures and air toxic hot spots regulations, or in district  
4 rules.

5 ARB methods are also used for research studies  
6 when using a consistent measurement technique is desirable.

7 During preparation of the proposed revised method,  
8 the staff has consulted interested parties, including the  
9 U.S. EPA, districts, source test contractors, and analytical  
10 laboratories.

11 Some of the revisions were prompted by U.S. EPA  
12 requests that the ARB upgrade methods so that the method can  
13 be incorporated into the State Implementation Plan.

14 Care has been taken to promote consistency with  
15 U.S. EPA methods to avoid multiple test requirements for the  
16 same pollutant at a facility. New analytical procedures  
17 have been added to improve the quality of the data and  
18 provide more flexibility for the tester.

19 The revised methods are not expected to increase  
20 costs of the testing, except in the case of Method 100, for  
21 which a 10 percent cost increase is projected.

22 Before we hear the staff's presentation for this  
23 agenda item, I would like to mention one general revision  
24 which applies to all test methods considered today. To  
25 ensure statewide consistency, we are proposing to remove the

1 authority of the districts to approve modifications to the  
2 adopted methods.

3 Under the proposal, the ARB Executive Officer  
4 would approve all modifications as long as they are found to  
5 give results that are equivalent to the adopted method. We  
6 believe that ARB approval would ensure that modifications  
7 are reviewed in a consistent manner and the stringency of  
8 the method is not compromised.

9 The requirement of ARB Executive Officer approval  
10 is not new, and is currently in place for the air toxics  
11 control measures and hot spot regulations. Districts will,  
12 however, continue to have the authority to adopt their own  
13 test methods, including the authority to approve  
14 modifications to their methods, an option that is exercised  
15 by the larger districts, such as the South Coast and the Bay  
16 Area Air Quality Management Districts.

17 At this time, I would like to turn the  
18 presentation over to Frances Cameron of our Monitoring and  
19 Laboratory Division, who will review the staff's  
20 recommendation.

21 Ms. Cameron?

22 MS. CAMERON: Thank you, Mr. Kenny. Good morning,  
23 Mr. Chairman and members of the Board.

24 The proposal before you today is to revise six  
25 stationary source control methods previously adopted by the

1 Board, as well as to adopt one new test method.

2 Before I discuss this proposal, I will first  
3 provide an overview of source testing as a context for  
4 today's action.

5 What is emission testing used for? Districts use  
6 ARB test methods to determine if a facility is meeting  
7 emission regulations. ARB test methods are used to  
8 determine compliance to the State's air toxic control  
9 measures.

10 Also, emission testing is conducted to evaluate  
11 the performance of air pollution control equipment.

12 And finally, emission tests are performed to  
13 obtain emissions inventory information.

14 Climbing a tall stack is what many people  
15 visualize when emissions testing is discussed. While at  
16 times we may have precariously from heights like these, we  
17 may also test emissions from the blue process unit shown in  
18 this slide. This is a catalytic oxidation control device  
19 used to reduce the emission of ethylene oxide from a  
20 sterilizer inside a hospital.

21 The most vital component of a source test is the  
22 people. A source team may routinely consist of three to  
23 five people with expertise in source testing. The source  
24 test must be conducted according to a specified procedure.  
25 In addition to ARB test methods, EPA and some district

1 methods are also available.

2           The data from a source test is a snap shot of the  
3 emissions at a facility. A test can vary between 30 minutes  
4 to eight hours; however, long-term emissions information is  
5 provided by permanently installed continuous emission  
6 monitors, or CEMS, and not by the source tests we are  
7 discussing today.

8           This picture shows the test apparatus or the  
9 sampling train used to measure poly aromatic -- polycyclic  
10 aromatic hydrocarbons, or PAHs.

11           This is a diagram of the modified Method 5  
12 sampling train which was pictured in the previous slide.  
13 Regardless of the individual components of a specific source  
14 test, there are elements common to all sampling methods.

15           The tester first extracts a sample from the stack  
16 through the sample probe. This slide is a view of the  
17 sample probe which the source tester has inserted through a  
18 port in the side of the stack.

19           Depending on the pollutant of interest, the sample  
20 is collected on various media. A particulate sample may be  
21 collected on a filter. Gases may be captured by condensing  
22 or reacting with various reagents in solution in a series of  
23 glass impingers.

24           Impingers are also used to condition the sample by  
25 removing moisture, acid gases, or other constituents which

1 may interfere with measurement of the target constituent or  
2 damage an analyzer.

3           Semi-volatile organic compounds, including PAHs,  
4 are collected in a resin-packed cartridge. Organic gases  
5 may be collected in Tedlar bags or evacuated cylinders for  
6 analysis at a later time.

7           Alternately, a gas sample may be conditioned and  
8 directly delivered to a gas analyzer to obtain immediate  
9 information on pollutant concentrations. With the exception  
10 of analysis by an onsite gas analyzer instrument, as shown  
11 on the previous slide, all of the pollutant samples I have  
12 mentioned must be analyzed in a laboratory.

13           Listed above are many of the laboratory methods  
14 that are used to analyze the collected sample. Analysis  
15 ranges from simply weighing the particulate matter on a  
16 filter to multi-step laboratory procedures for sample  
17 recovery and analysis. These more sophisticated procedures  
18 include gas chromatography, mass spectrometry, and various  
19 spectroscopy procedures.

20           Each source test method contains specific  
21 procedures to ensure that data collected will be accurate  
22 and precise. Some quality control and quality assurance  
23 activities include instrument and meter calibrations and  
24 the determination of interference from nontarget  
25 constituents. Other activities are the use of field and

1 laboratory blanks and the use of spiked samples.

2 Here is a technician flushing a Tedlar bag with  
3 nitrogen to prevent contamination of the sample which will  
4 be collected.

5 This slide concludes our overview of emissions  
6 testing. I will now present some details of today's  
7 proposal.

8 Since 1983, the Board has adopted 47 test methods  
9 which are applicable to a wide variety of stationary  
10 sources. The proposal before you today is part of our  
11 continuing effort too update and improve the ARB source test  
12 methods.

13 Specifically, our proposal is to revise four  
14 existing test methods, to adopt one new test method, and to  
15 make minor revisions for two additional adopted test  
16 methods.

17 We are proposing revisions to the four test  
18 methods listed here. Method 100 is used for continuous  
19 gaseous emission stack sampling. It specifies how to use  
20 gas analyzers in the field to get realtime data for the  
21 criteria pollutants.

22 Target pollutants include nitrogen oxides, sulfur  
23 dioxide, carbon monoxide, and hydrocarbons. The method is  
24 frequently used for a variety of sources, including boilers,  
25 stationary engines, and cement kilns.

1           Method 425 is used to measure total and hexavalent  
2 chromium at plating tanks, glass melting furnaces, and  
3 utility boilers.

4           Method 429 is a procedure for measuring PAHs,  
5 polycyclic aromatic hydrocarbons, from a variety of  
6 combustion sources. The method has been used at municipal  
7 waste incinerators and wood-fired boilers.

8           Finally, Method 431 is used to determine emissions  
9 of ethylene oxide, which is a sterilant used at hospitals  
10 and other medical facilities.

11           We are proposing that the Board adopt one new test  
12 method, Method 436, for the determination of multiple metals  
13 emissions. The method has been used as a draft ARB  
14 procedure since 1989, and has been revised a number of  
15 times.

16           This method is used to measure up to 19 individual  
17 metals, such as arsenic, lead, nickel, and mercury. The  
18 method has been applied to measure emissions from combustion  
19 sources. Some of these include tire incinerators, cement  
20 kilns, and crude oil steam generators.

21           As the third element of the staff proposal, we are  
22 recommending minor revisions and editorial changes to  
23 adopted ARB Methods 5 and 7; 5 is used extensively to  
24 measure particulate emissions. Method 7 is a wet chemistry  
25 reference procedure for measuring nitrogen oxides.

1           The proposed revisions to the above ARB test  
2 methods are necessary changes. These revisions will ensure  
3 that ARB methods are consistent with EPA test methods. The  
4 proposal will also promote statewide consistency in source  
5 testing.

6           Finally, our revisions provide flexibility,  
7 incorporate new measurement technology, and improve data  
8 quality.

9           We revised ARB methods to be consistent with EPA  
10 test methods. With greater uniformity between State and  
11 Federal test methods, a plant operator can lower costs by  
12 running one test to meet both district and federal  
13 requirements.

14           As an example, we included new quality assurance  
15 procedures for Method 100. EPA required these procedures as  
16 a condition to approve the State Implementation Plan. These  
17 data quality procedures require the use of more field  
18 calibration gases. As an alternative to the added cost and  
19 hazard of transporting more gas cylinders, we now allow the  
20 use of a gas dilution system.

21           We surveyed the source test companies, which are  
22 certified by ARB, to determine the possible economic impact  
23 of these data quality revisions. The survey results showed  
24 that the cost of a Method 100 test would increase by about  
25 10 percent, or \$300.

1           The proposed quality assurance procedures are  
2 already required in EPA source tests. Thus, these revisions  
3 are already standard practice for a number of companies.

4           In the interest of promoting uniform testing  
5 statewide, we are now requiring that modifications to the  
6 test methods can be approved only by the ARB Executive  
7 Officer. Previously, either the districts or the ARB could  
8 approve modifications to ARB test procedures.

9           However, several companies have requested the  
10 change to simplify the business of source testing in  
11 California. Districts still retain the authority adopt  
12 their own test methods, and several districts have exercised  
13 this option. For example, in the place of the ARB test  
14 Method 100, the South Coast Air Quality Management District,  
15 as well as the Bay Area and San Diego, have adopted their  
16 own test methods.

17           We have also modified the methods to provide  
18 flexibility for difficult-to-test industrial processes. As  
19 an example, Method 431 is specified in the ARB's ethylene  
20 oxide airborne toxic control measure for sterilizers and  
21 aerators. One option we added is to collect an integrated,  
22 or averaged, sample over an entire process cycle and analyze  
23 that sample at the laboratory.

24           The method originally prescribed that a series of  
25 grab samples of the exhaust be analyzed onsite. Although

1 our reason for this change is a more accurate measurement of  
2 emissions, the cost of the test is also reduced because a  
3 chemist and a gas chromatograph would no longer be needed at  
4 the facility being tested.

5 We anticipate no adverse environmental impacts  
6 from this proposal. Also, this proposal is not expected to  
7 have significant adverse economic impacts, but should result  
8 in some cost savings for source test firms and the  
9 industrial community.

10 As outlined in previous slides, promoting  
11 statewide consistency and consistency with EPA methods will  
12 simplify testing requirements and result in lower costs to  
13 industry.

14 And, as stated earlier, the proposed revisions for  
15 Method 100 may result in a minimal cost increase for some  
16 source test companies.

17 Your action today will assist source testers  
18 statewide. A number of the revised methods are already  
19 being used as draft ARB methods because of the necessary  
20 improvements they contain. However, source testers are  
21 currently required to obtain case-by-case approval for use  
22 of these draft methods. Your action would eliminate this  
23 requirement.

24 We develop ARB test methods to support  
25 California's unique emission control programs. To rely

1 solely on U.S. EPA methods would be detrimental, because  
2 there may be no EPA method available for a particular  
3 pollutant or source.

4 For example, we developed Methods 429 for PAH and  
5 431 for ethylene oxide because there was no EPA test method  
6 available for either of these pollutants and their sources.

7 ARB methods also provide guidance and flexibility  
8 not in EPA methods. And finally, many district regulations  
9 refer to ARB test methods.

10 In conclusion, staff recommends that the Board  
11 should adopt one new test method and the six revised test  
12 methods.

13 Also, we propose that the regulations are adopted  
14 to incorporate these test methods by reference.

15 I will now summarize the written responses we have  
16 received during the 45-day public comment period. We did  
17 receive a total of ten comment packages -- three from  
18 industry, one from a source test company, two from  
19 analytical labs, one from an instrument manufacture, two  
20 from districts, and one from U.S. EPA.

21 So, I will go through each one now. Mr. Alan Bahl  
22 of Red Star Yeast wrote regarding his concern that ARB  
23 Method 100 would impose inappropriate requirements for the  
24 permanently installed monitoring system at the Red Star  
25 Oakland facility.

1           Although Method 100 is titled "Continuous  
2 Emissions Stack Sampling," the method does not apply to  
3 continuous emission monitoring systems which are permanently  
4 installed at the facility.

5           Mr. Bahl was relieved to learn that Method 100  
6 would not apply to the monitoring installing at the Red Star  
7 facility.

8           Michael Wang of WSPA provided general and  
9 editorial comments on the proposed revisions. These include  
10 support of ARB only modification approvals, coupled with the  
11 request for guidance to avoid testing delays, while seeking  
12 modification approvals.

13           The letter also highlighted the need to update  
14 method references and consistent treatment of detection  
15 limits in each method

16           Some of WSPA's requested changes are contrary to  
17 long-standing ARB policies, which we agree should be  
18 reviewed.

19           Although we have not yet had time to fully review  
20 the comments, it is likely that many of the changes proposed  
21 will be incorporated. And we also understand that someone  
22 from WSPA will be testifying today.

23           Mr. W. A. Bromalesque (phonetic) of Chevron USA  
24 Production Company wrote to propose a minor modification to  
25 Method 100. We have spoken to Martin Lundy (phonetic) of

1 his staff regarding his proposal to add flexibility to the  
2 determination of gas stratification.

3 His suggestion has merit, and we would like to  
4 review it more thoroughly, as we received it this morning.

5 Mr. Jim Steiner of Steiner Environmental suggested  
6 a number of revisions to Methods 5, 100, and 436. His  
7 comments reflect careful consideration of each of these test  
8 methods. We recommend incorporating a number of his  
9 recommendations regarding sampling equipment, test  
10 procedures, and sample recovery.

11 We will not include some changes which are not in  
12 the comparable EPA test methods due to our desire to  
13 maintain consistency with EPA methods.

14 Other proposed revisions will not be included,  
15 because our engineering review yielded a different solution  
16 to some of the testing concerns Mr. Steiner discussed.

17 Mr. C. E. Riley of Triangle Labs, North Carolina,  
18 provided comments for Methods 429 and 436. We will respond  
19 to his concerns by modifying Method 429 to ensure that  
20 contamination does not occur in sampling and recovery  
21 procedures and by updating the bibliography to Method 436.

22 Mr. Robert Wright of Research Triangle Institute  
23 commented on Method 100 regarding gas dilution systems. He  
24 stated that gas dilution systems must undergo more extensive  
25 evaluation.

1           He also commented that the method should allow the  
2 use of technologies other than mass flow controllers. We  
3 appreciate his informative letter and will consider his  
4 comments to strengthen Method 100.

5           Mr. Bruce Shroyer of Calibrated Instruments  
6 commented that Method 100 is deficient, in that it does not  
7 provide criteria for the use of gas dilution systems other  
8 than mass flow controllers.

9           He commented that the annual certification  
10 procedure is not appropriate for positive displacement pumps  
11 and capillary tube systems. We agree that the method does  
12 not provide certification requirements appropriate to these  
13 devices. We have invited Mr. Shroyer, as well as another  
14 manufacturer, to provide us with an appropriate  
15 certification protocol.

16           Until we are provided with that information, we  
17 recommend that the existing Method 100 and gas dilution  
18 appendix be adopted. The method does allow for alternative  
19 gas dilution devices to be approved by the Executive  
20 Officer. We will review the language and make modifications  
21 to clarify that option.

22           The South Coast and San Diego Districts have made  
23 comments on all the methods. We will adopt a number of the  
24 proposed changes. We will also work with district staff on  
25 the remaining minor issues.

1           And finally, Mr. Daniel Meer, Chief of the  
2 Rulemaking Section, EPA Region IX, has written to inform  
3 staff that five of the seven proposed ARB methods are  
4 acceptable and may be substituted for comparable EPA test  
5 methods.

6           EPA did not provide review of ARB Methods 425 and  
7 431, because the EPA has no comparable methods for those two  
8 procedures.

9           As a result of the responses that we've received  
10 during the 45-day public comment period, staff proposes to  
11 make additional minor changes to the methods and provide  
12 those changes to the public for a 15-day comment period.

13           This concludes the staff presentation.

14           CHAIRMAN DUNLAP: Okay. Very good. Thank you.  
15 Any questions of staff before I go to Mr. Schoning?

16           Yes, Ms. Edgerton.

17           MS. EDGERTON: I'd like to focus my questions on  
18 the particulate emissions testing, ARB Rule 5. As you know,  
19 we're going to need to put in a particulate SIP in 1997.

20           My understanding of this -- I just want to be  
21 educated a bit. These are just questions to educate me. My  
22 understanding is that -- am I correct that this measurement  
23 not only measures down to particulate size 10 microns --  
24 what does it measure to?

25           What does our testing measure?

1 MS. CAMERON: It does measure total particulate.  
2 There's a filter there, and then there are impingers. So,  
3 whatever particulate was not caught on the filter would be  
4 caught in solution in the impingers. And we do analyze  
5 those impinger solutions for particulate.

6 MS. EDGERTON: What size particulate do you  
7 analyze them for? What size?

8 MS. CAMERON: It would be everything, every  
9 compound other than water that would show up in that  
10 impinger would be counted as particulate.

11 MS. EDGERTON: So, if I understand you correctly,  
12 the testing method tests particulates of every size,  
13 including particulates of 2.5 microns?

14 MS. CAMERON: There's no size discrimination in  
15 that method and it does, in fact, particulate that is formed  
16 as aerosols.

17 MS. EDGERTON: Is there a way that we would know  
18 how many of the particulates are 10 microns and how many are  
19 2.5? Between 2.5 and 10 from this test?

20 MS. CAMERON: We do have a size segregated method,  
21 Method -- I believe it's 501 -- that would take care of  
22 those sizing issues.

23 MS. EDGERTON: So, if I understand you correctly,  
24 the ARB is going to be in a position to have the data, as a  
25 result of these tests, of what percentages of the

1 particulates from our stationary sources in the districts  
2 are between 2.5 microns and 10 microns?

3 That data will be coming in to us so that we can  
4 make an intelligent decision about our particulate SIP?

5 Is that correct?

6 CHAIRMAN DUNLAP: If I might, Ms. Edgerton, staff,  
7 are you going to have the capability to determine, to  
8 discriminate based upon size until it doesn't discriminate,  
9 so we'll be able to tell; but can you segregate the  
10 particulate matter that's caught in these samplers by size?

11 MR. LEW: Not for this -- Method 5 is a total  
12 particulate method. Method 501 will be able to do the size  
13 segregation. So, it is not one of the methods in discussion  
14 today.

15 CHAIRMAN DUNLAP: All right.

16 MS. EDGERTON: The answer seems to be yes?

17 CHAIRMAN DUNLAP: Yes.

18 MR. LEW: Yes.

19 CHAIRMAN DUNLAP: The answer seems to be yes.

20 What I would appreciate, Mr. Kenny, is if you would get to  
21 the Board what kind of monitoring capabilities, collection  
22 capabilities we will have now as of the action -- presuming  
23 it's a positive action here today -- what we will have and  
24 how that position -- as Mr. Boyd said, the new "PMX"  
25 standard, whatever it may be, so that we can have a sense of

1 how much more equipment or monitoring systems we'll have to  
2 have.

3 Ms. Edgerton, will that comfort you if we had that  
4 information?

5 MS. EDGERTON: Yes. I appreciate that very much.  
6 And I appreciate your putting my question more articulately.  
7 And I guess I'd make just a friendly amendment to that, too.  
8 As you -- as the staff reviews that and, as you look at  
9 that, Mr. Kenny, if you do find that there's a need for some  
10 guidelines or there's some way to give the districts some  
11 advance notice -- or if there's something we can be doing to  
12 help to make sure that we're not blind-sided in some way as  
13 we ramp up to our responsibilities next year.

14 I would appreciate -- I would just suggest that  
15 that be returned to the Board and the Chairman as well.  
16 Thank you.

17 CHAIRMAN DUNLAP: Okay.

18 MR. PARNELL: Mr. Chairman?

19 CHAIRMAN DUNLAP: Sure, Mr. Parnell.

20 The only caution I have for my colleagues, I just  
21 wanted Mr. Schoning to give us an overview of the process  
22 before we got too far into this. But I've opened it up, so  
23 we'll just go. And, Jim, we'll come back to you.

24 Mr. Parnell.

25 MR. PARNELL: Perhaps he's answered my question.

1 And I certainly applaud your efforts to be more uniform and  
2 more consistent. Consistency is an issue that we all want  
3 to work for.

4 I guess the overall -- the question that I would  
5 have is, in the aggregate, across all the tests and the  
6 changes you're making to the tests, is the result or are the  
7 results diluted in any way? Is this a better result, or a  
8 poorer result?

9 Are we making a change for the sake of consistency  
10 or are we making changes because we believe we get a better  
11 product?

12 MS. CAMERON: Well, as the engineering staff  
13 there, our job is to get a better product. But when we  
14 present it to you, we know you're interested in costs, also.

15 So, we highlighted those areas. We have worked  
16 specifically on improving data quality, including new  
17 measurement technology. And those are our goals.

18 MR. PARNELL: So, in your view, these changes will  
19 result in a better result, in a better testing.

20 MS. CAMERON: Yes.

21 CHAIRMAN DUNLAP: Mr. Calhoun.

22 MR. CALHOUN: My question pertains to consistency.  
23 I note that the districts still have the option of adopting  
24 their own test methods. In the event that that happens,  
25 what do we do to try and maintain the consistency throughout

1 the State?

2 MR. LOSCUTOFF: Would you repeat that?

3 MR. CALHOUN: Since the local districts still have  
4 the authority to adopt their own test methods, and since one  
5 of the objectives of the proposed changes here is to have  
6 some consistency, I'm wondering what do we do, as a State  
7 agency, to try and make certain that whatever the district  
8 adopts is consistent with the existing State regulating, or  
9 maybe it's consistent with some other district regulation?

10 I'm just concerned about the consistency here.

11 MR. LOSCUTOFF: Okay. There are two aspects to  
12 this. One is that we have worked very closely with the  
13 districts in developing these methods; and with the concept  
14 of working as a team, we will adopting method which they  
15 would prefer to adopt without any changes. That would  
16 promote consistency in itself.

17 Now, the other aspect of it is that, if the  
18 districts do adopt regulations with -- of their own or test  
19 methods on their own, there still is essentially an overview  
20 process which occurs in that. If the method is applicable  
21 to a regulation, which is necessary for a State  
22 Implementation Plan, we still do have the opportunity to  
23 review and make sure that it is consistent and performs the  
24 way that it's supposed to perform for compliance purposes.

25 So, there's a two-step process there.

1 CHAIRMAN DUNLAP: Okay.

2 MR. CALHOUN: I assume that's what would happen if  
3 a local district wanted to adopt a test procedure, they  
4 would consult with the State and get the benefit of their  
5 input, also. I just wanted to get that on the record.

6 MR. LOSCUTOFF: Yes.

7 CHAIRMAN DUNLAP: Okay. Mr. Ombudsman, would you  
8 please address the process prior to today by which the staff  
9 followed to bring this item to the Board, and share any  
10 concerns or any comments you may have.

11 MR. SCHONING: Yes, Mr. Chairman and members.

12 As to the method by which these methods came to  
13 us, the staff proposal, as they indicated, is the result of  
14 several years of consultation with those parties that are  
15 directly stakeholders to this item -- some 200 interested  
16 companies, such as source test companies, contractors, and  
17 trade groups.

18 A public workshop was conducted here in Sacramento  
19 in December of 1995 for all proposed methods which are  
20 before you today. A prior workshop was conducted in 1992 in  
21 Sacramento.

22 In addition, ARB certified source test contractors  
23 were requested to provide information on possible economic  
24 impacts to them. I would also like to note that in December  
25 of 1995, a workshop notice was placed on U.S. EPA's

1 emissions measurement technology information center bulletin  
2 board.

3           And, as a result, staff received a number of  
4 comments from source tester companies through that channel.  
5 It's my understanding that staff welcomed the efforts of the  
6 representatives of source testing companies, and analytical  
7 labs, and instrument manufacturers, and sharing their  
8 experience and expertise. And, as a result, the ARB test  
9 method proposals before you would improve our test method  
10 procedures.

11           We have no concerns as to the process by which  
12 these method were developed and brought before you today.

13           CHAIRMAN DUNLAP: Okay. Very good. It was  
14 interesting to hear that the electronic bulletin board  
15 system enhanced -- because we hear so much about people  
16 accessing the process electronically. It's good to know.

17           Okay. Any other questions of staff? For my part,  
18 just a comment. I appreciated the briefing that staff  
19 provided me, and Mr. Loscutoff and his team were very, very  
20 serious about the need to do this. And I appreciated the  
21 manner in which they presented it to me, and trying to -- I  
22 don't want to suggest "dumbing it down" for me, but going  
23 into enough detail so I could grasp what the outcome was  
24 going to be for the suggested changes today.

25           So with that, looking at the witness list, we

1 don't have anyone that signed up. So, we can pass on that.

2 We've covered the written comments we received.

3 Mr. Kenny, I suppose you don't have anything else  
4 to add?

5 MR. KENNY: No, Mr. Chair.

6 CHAIRMAN DUNLAP: All right. I will now close the  
7 record on this agenda item. However, the record will be  
8 reopened when the 15-day notice of public availability is  
9 issued. Written or oral comments received after this  
10 hearing date but before the 15-day notice is issued will not  
11 be accepted as part of the official record on this agenda  
12 item.

13 When the record is reopened for the 15-day comment  
14 period, the public may submit written comments on the  
15 proposed changes, which will be considered and responded to  
16 in the final statement of reasons for the regulation.

17 Also, we have an ex parte reporting obligation on  
18 this item. Is there anything that needs to be reported?

19 Okay. With that, we have a Board resolution  
20 before us, 96-7 -- let's see, do I have that right?

21 MR. PARNELL: Resolution 96-46.

22 CHAIRMAN DUNLAP: Resolution 96-46 -- I'm sorry --  
23 which contains the staff recommendation.

24 Mr. Parnell, do you have a motion?

25 MR. PARNELL: I'll move Resolution 96-46.

1 CHAIRMAN DUNLAP: Okay. Is there a second?

2 SUPERVISOR ROBERTS: Second.

3 CHAIRMAN DUNLAP: All right. Any discussion that  
4 needs to occur?

5 All right. If not, we'll take a voice vote. All  
6 those in favor of Resolution 96-46, say aye?

7 (Ayes.)

8 Any opposed? All right. Motion carries. Thank  
9 you.

10 All right. If I may move into a couple fun items  
11 for a moment -- not that those weren't fun, staff, but --

12 (Laughter.)

13 CHAIRMAN DUNLAP: -- I would like too cover a  
14 couple things that we need to cover.

15 The first item, which I'll mention that I'm going  
16 to take in just a moment is, we have a resolution we'd like  
17 to present to Jim Boyd, our former Executive Officer.

18 But before we do that, I would like to cover one  
19 that's more housekeeping in nature, and that's the Pollution  
20 Prevention Week Resolution.

21 Pollution Prevention Week occurs -- it's been  
22 around for a number of years -- it occurs the first or  
23 second week of October. It is meaningful in many ways.  
24 First, it dovetails very nicely with our mission of public  
25 health protection; in that, if we can prevent pollution in