Public Hearing on the 2005 Amendments to 2003 PM10 Plan

May 19, 2005

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Purpose of amendments

- Add new contingency measures based on reductions achieved/new measures
- Update control measure implementation dates w/ latest schedule
- Update emission reductions w/ amounts achieved or w/ new estimates
- Demonstrate these changes have no adverse impact on attainment demo/RFP/5% milestones
PM10 Plan Background

- District adopted plan in June 2003 and amended it in December 2003
- Implements Best Avail. Control Measures (BACM) for PM10 and precursors
- Achieves at least 5% per yr reduction in PM10 or precursor emissions
- Demonstrates 2010 attainment
- Commits to plan revision March ‘06
Contingency Measures

- EPA approved *2003 PM10 Plan* on May 26, 2004, effective June 25, 2004
- EPA has not yet approved or disapproved the contingency measures
- District needs to revise contingency measures to align them with federal requirements
- Contingency measures provide automatic emission reductions if RFP or attainment milestones are not met
Control measures & rules

- Control measures in plan are based on best information at time of plan development
- Rules are developed from control measures using a more rigorous process
- Reductions can vary from control measure to rule for a variety of reasons
Control measure schedule

- District adopted rules for over 90% of the direct PM10 emission reductions in the Plan and over 80% of the NOx emission reductions
- Some remaining measures are behind schedule
- Later implementation can cause reductions to occur after key milestones
- Reductions from other measures offset shortfall
Rule Development Schedule

- Same Control Measures as current Plan or as required by new state law
  - No changes to Reg VIII or CMP
  - No new Control Measures proposed solely for these Amendments
- Rule development schedule updated to reflect current estimated adoption
- Surplus reductions from rules & incentives are used to mitigate changes in reductions
- Reductions that are surplus after accounting for changes are available for contingencies
Ag IC Engines – Rule 4702

- Ag IC Engines added to meet BACM requirement in Dec 03 Amendment
- Not used for 5% calculations or attainment demonstration
- Moving reductions to contingency for 2010 with rule adoption by June 2005
- Reductions scheduled for 2008 to be achieved by District and State incentive funding: 5.3 tons/day District, 2.2 tons/day State Moyer
- Not backsliding since source will be controlled to the same extent during the same timeframe as originally proposed
Contingency Measures

- Incentive Funding Program
  - DMV fees/VECAP
  - Moyer funds
  - HD Engine Program/REMOVE II
- Control Measures in Development
  - Rule 4702 (Stationary Ag IC Engines)
  - Rule 4103 (Open Burning)
- Current Plan Contingency Measures
  - Reg VIII, CMP, Local Agency Commitments
Incentive Funding

- Incentive funding greatly increased over plan estimate
  - $6 million vs. $24 million in 2005
  - ~$17 million/yr through 2010
- Cost-effectiveness much better than predicted
  - $9,000/ton vs. $1,396 in 2004
- New projections based on cost-effectiveness of available projects and account for increasing cost-effectiveness
- Worked closely with ARB to quantify reductions available from Moyer funds
Emissions accounting

Emissions reductions: (original vs. current)

+ Reductions from rules and incentives

Net effect of changes
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- RFP still met – incremental progress achieved
- 5% requirement still met
- Attainment demonstration still valid; reductions better in 2010
- Surplus reductions identified for use as contingency
Public Process

- Public workshop held on March 30, 2005
- Comments requested more data supporting the amendment and second workshop
- Second workshop held April 26, 2005
- Comment period ended May 3, 2005 – no comments received
- Comment for CRPE received on May 12
Next Steps

- If approved by Governing Board, submit to ARB for concurrence
- ARB will submit to EPA for approval
- Staff now working on 2006 PM10 Plan due March 2006 that will provide new attainment demonstration based on CRPAQS modeling, updated inventory and assessment of adopted controls
- New contingency measures can be considered in the 2006 Plan.