

Chapter 8

Commitment to Leave No Stone Unturned to Evaluate Additional Opportunities

2015 Plan for the 1997 PM_{2.5} Standard
SJVUAPCD

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Chapter 8: Commitment to Leave No Stone Unturned to Evaluate Additional Opportunities

As discussed earlier, this *2015 Plan for the 1997 PM_{2.5} Standard (2015 PM_{2.5} Plan)* contains Most Stringent Measures, Best Available Control Measures, and ensures expeditious attainment. Furthermore, under Section 4.2 of Chapter 4, this plan commits to producing additional reductions in emissions to further expedite attainment. Despite the fact that this plan contains all the necessary elements for approval, the District is fully aware that meeting the tougher newer National Ambient Air Quality Standards require additional efforts and further reductions in emissions.

Over the next year, the District must adopt State Implementation Plans (SIP) to address the 2006 PM_{2.5} Standard (of 15 µg/m³ annual and 35 µg/m³ 24-hr) and the 2012 PM_{2.5} Standard (of 12 µg/m³ annual and 35 µg/m³ 24-hr). Additionally, the District must also develop a SIP for the 2008 Ozone Standard (of 75 ppb) by July 2016. As always, the District will leave no stone unturned to evaluate and identify further opportunities to advance attainment of the ever-tightening National Ambient Air Quality Standards. Of course, the opportunities identified to reduce emissions towards meeting these tougher standards may also help expedite attainment with the 1997 PM_{2.5} standard addressed by this plan. In developing these plans, the District will reevaluate all of its existing regulations and will explore all potential measures for all source categories. However, in the short term, the District commits to conduct the evaluations described below and to include any identified additional actions for reducing emissions and implementation schedules in the District's attainment plan submission for the 2012 PM_{2.5} NAAQS in Fall 2016.

8.1 Rule 4311—Flares

As demonstrated in Appendix C, District Rule 4311 already meets BACM and MSM requirements. However, due to the need to demonstrate attainment for multiple federal ozone and PM_{2.5} standards in the coming years and need to search for all available emissions reductions, the District commits to undertaking a comprehensive review of FMPs submitted under Rule 4311. The District commits to conduct the evaluation and have a draft report available for public review and commenting by December 1, 2015. After addressing public comments, the District commits to finalize this report by March 31, 2016. This evaluation will be conducted in close coordination with flare operators in the Valley and will include the following elements:

1. The District will review submitted FMPs to identify the most effective flare minimization practices utilized by operators to reduce flaring in various source categories and applications. Upon completion of review, the District commits to working closely with affected operators to evaluate and implement, when feasible, the most effective flare minimization practices through the FMP submittal and approval process under Rule 4311.
2. The District will evaluate the technological achievability and economic feasibility of implementing new/additional minimization practices or technologies at affected facilities.

8.2 Warm Mix Asphalt

Emissions from asphalt usage are extremely small and do not significantly contribute to elevated PM_{2.5} levels in the Valley. However, due to the need to demonstrate attainment for multiple federal ozone and PM_{2.5} standards in the coming years and need to search for all available emissions reductions, the District commits to a number of actions to evaluate and promote the use of WMA in the Valley. The District commits to conduct the evaluation and have a draft report available for public review and commenting by December 1, 2015. After addressing public comments, the District commits to finalize this report by March 31, 2016. This evaluation will be conducted in close coordination with stakeholders (asphalt plant operators, Caltrans, city and county planning departments, ARB, EPA, and others) and will include the following elements:

1. The District will evaluate opportunities to further encourage transportation and county agencies to continue transitioning from HMA to WMA as feasible. As part of this evaluation, the District will explore the potential feasibility of additional control measures and granting mitigation credits for WMA usage through the District's Indirect Source Review (ISR) program.
2. The District will evaluate potential outreach and education opportunities for encouraging project developers/construction managers to increase their adoption and implementation of WMA.

8.3 Rule 4550—Conservation Management Practices

As documented in Appendix C, District Rule 4550 already meets BACM and MSM requirements. It is also questionable that further opportunities for reducing PM_{2.5} emissions exist. However, as stated earlier, in developing plans for the new and existing National Ambient Air Quality Standards, the District will reevaluate all existing regulations including Rule 4550 to evaluate all feasible opportunities for additional emissions reductions, if any. The District commits to conduct the evaluation and have a draft report available for public review and commenting by May 31, 2016. After addressing public comments, the District commits to finalize this report by October 15, 2016. This evaluation will be conducted in close coordination with stakeholders (agricultural industry representatives, ARB, EPA, NRCS, farm bureaus, and others).

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