

Rule 2280

Portable Equipment Registration

September 13, 2018
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Purpose of Tonight's Meeting

- Kick-off the public rule development process for potential changes to the District's portable equipment registration rule
- Share information on potential changes under consideration
- Review opportunities for public engagement and input
- Discuss next steps and rule development timeline

Rule 2280 – Portable Equipment Registration

- The nature of portable sources dictates a different approach to permitting as compared to traditional stationary sources
 - Intended purpose of the equipment is for it to be used for a short period of time at many different locations throughout the Valley, or even the state
 - Not reasonable or feasible to require an operator of a piece of portable equipment to obtain a permit for each location at which the unit will be operated
- Rule 2280 established a portable equipment registration program that afforded operators of portable equipment the needed flexibility while ensuring the necessary environmental safeguards
- Provides owners and operators of portable equipment with the ability to register certain portable equipment as an alternative to permitting

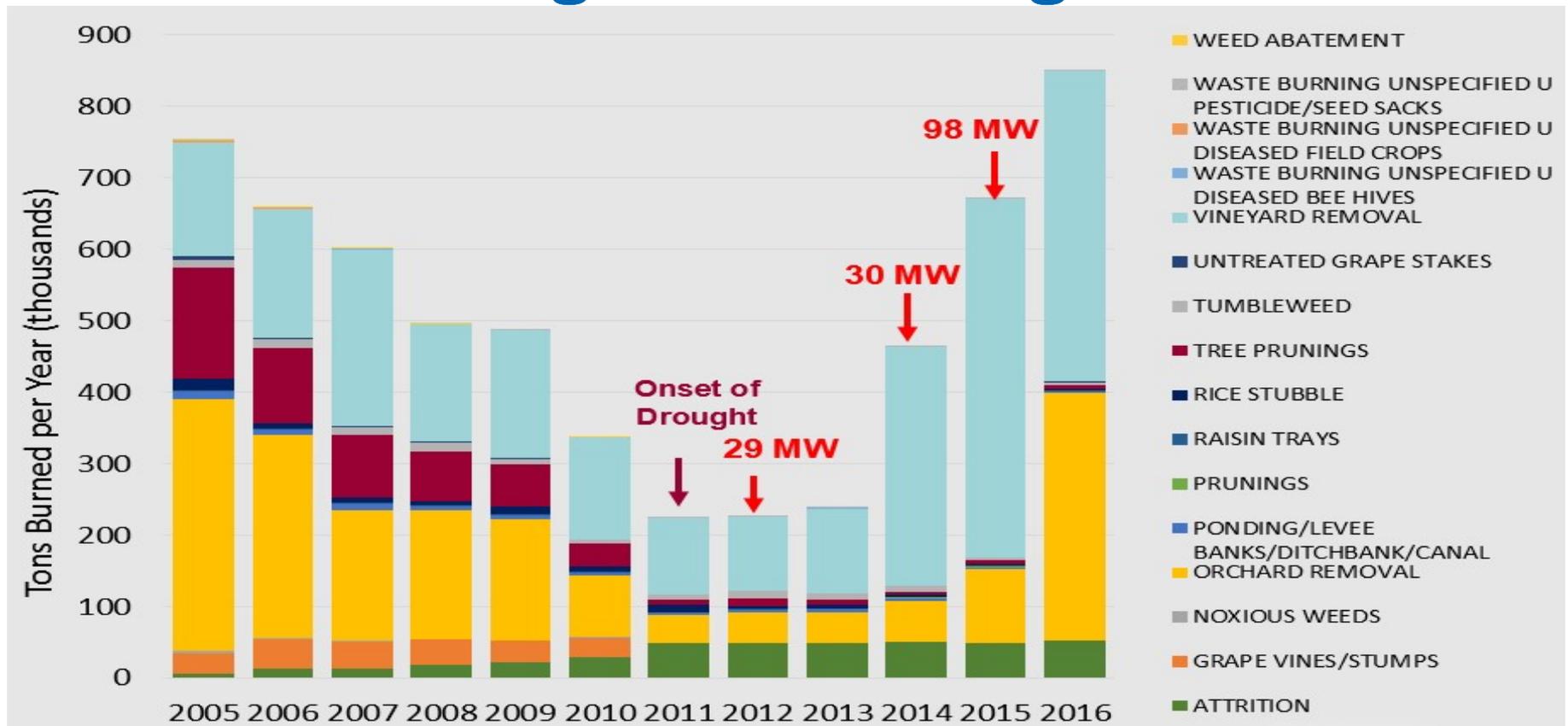
Why the District is Amending Rule 2280?

- California Air Resources Board adopted a portable Airborne Toxics Control Measure in 2011 for diesel internal combustion engines that has superseded the diesel engine requirements of Rule 2280
 - Administrative update to remove and replace outdated requirements
 - Clarify diesel engines must comply with portable ATCM requirements as is current practice
- Add air curtain burn boxes as a source category in the rule
 - Provides a cleaner alternative to open burning of agricultural waste
 - Due to the ability and need to operate at multiple unforeseen and unspecified locations for a short period of time, traditional permitting is not feasible
 - The use of air curtain burn boxes as an alternative to on-field open agricultural burning is similar in manner to equipment used to chip wood that is currently allowed in the portable regulation
 - When used as a part of a stationary source such as a processing facility, units require traditional stationary source permitting

Need to Facilitate Alternatives to Open Burning

- Valley has toughest restrictions on ag open burning
- In 2003 Senate Bill 705 was adopted requiring the phase-out of agricultural open burning by crop type
- From 2003 to 2012, open burning of agricultural waste had been reduced by over 80%
- The primary alternative was biomass plants and their agreements with power utility companies began expiring in 2012 and were not as attractive as other renewable power sources such as solar and wind
- Led to the closure of 6 of the 11 plants valley-wide
- District cannot count on long term viability of biomass power industry
 - State energy policies disfavor biomass
 - Business model not profitable without public subsidy
 - Lack of coordination and communication with farmers

Impact of Drought and Biomass Plant Closures on Ag Waste Burning



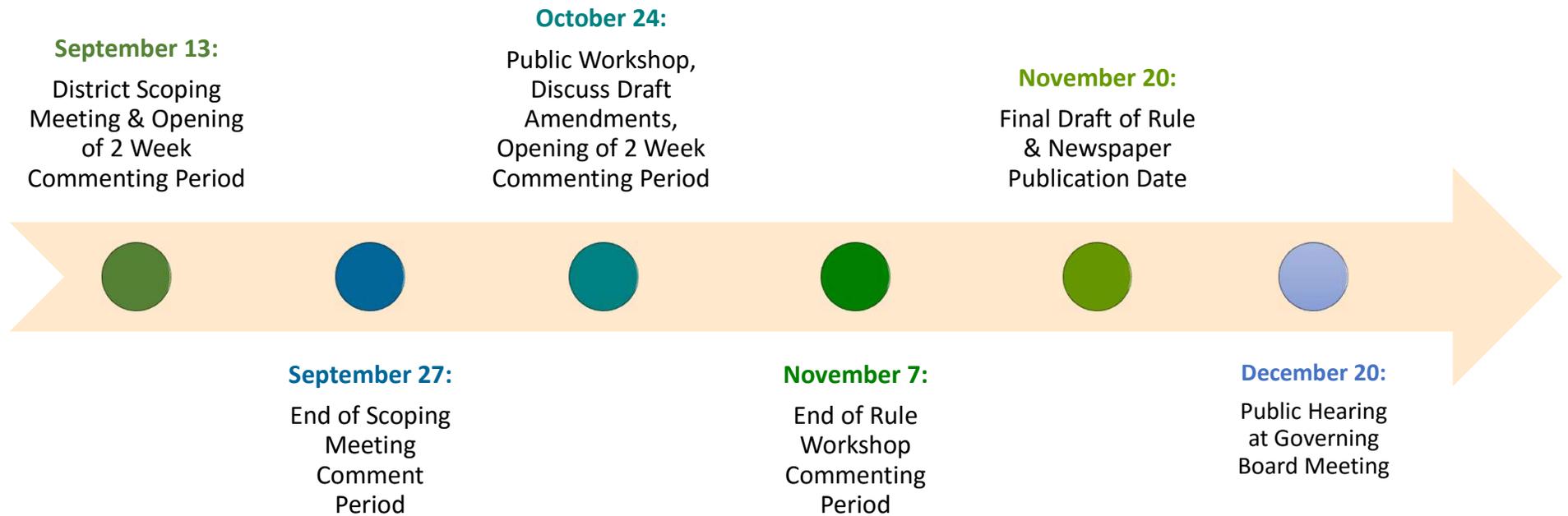
Advancing Alternatives to Open Burning

- District held the 2017 Central Valley Summit on Alternatives to Open Burning of Agricultural Waste in November 2017 to discuss this issue
- Many options discussed during the summit, one of which was use of air curtain burn boxes
- February 2018, District Governing Board directed staff to explore the feasibility of utilizing air curtain burn boxes subject to the District's smoke management system safeguards as an extension of agricultural operations
 - Air curtain burn boxes have been shown to be up to 80% cleaner than open burning of agricultural waste, and when coupled with the District's smoke management system have the potential to manage emissions from the disposal of agricultural waste very effectively

Potential Requirements for Air Curtain Burn Boxes Under a Registration Program

- Air curtain burn boxes are subject to federal New Source Performance Standards which has the possible requirements:
 - Use of only clean dry wood
 - Opacity limitations
 - Visible emissions evaluations by people certified to conduct reading using EPA Method 9
 - Throughput limits
- Daily authorization under District's smoke management system
- Minimum set back requirements from sensitive receptors (schools, hospitals, etc.)
- Other emission minimization practices (drying times, hours of operation, manufacturer suggested best operating practices, etc.)

Next Steps...



Comment Period

Please submit comments by September 27, 2018 at 5PM

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Comments?