



Valley Air News

A publication of the San Joaquin Valley Air Pollution Control District

July 2000

Severe Bump-Up Starts Timelines

On June 12, the US Environmental Protection Agency (USEPA) proposed the re-designation of the San Joaquin Valley Air Basin from serious to severe nonattainment for the one-hour ozone National Ambient Air Quality Standard. The reclassification, commonly called a bump-up, will set a new attainment date of November 15, 2005 for this standard. A thirty-day review and comment period on the proposal will end on July 19, 2000 and the District expects the findings to become final sometime in the fall.

"Simply stated, without unprecedented cooperation between the District, transportation planning agencies, the California Air Resources Board and stakeholders, the Valley will not meet the federal ozone standard by 2005."

*Scott Nester
Supervising
Air Quality Engineer*

The USEPA proposal set the ground-rules for the next round of ozone planning and issued a pointed reminder for the District to finish previous plan commitments. Along with the bump-up, the USEPA proposed a finding that the District had not yet adopted and implemented six measures projected to achieve 8.09 tons per day emission reductions. These measures, originally specified in the District's Ozone Attainment Demonstration Plan,

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What's Driving Air Pollution?

Ask someone what is responsible for the majority of air pollution in the Valley and you will get a number of answers: fireplaces, the Bay Area, industry, and agriculture. While these are all emission sources, they are not the major culprits. Nearly 60 percent of air pollution in the Valley comes from vehicle emissions.

Today's passenger vehicles are less polluting than previous models, but due to an increasing population, there are more of them on the road than ever. In fact, there are currently over 2.6 million registered vehicles in the

Valley. Drivers can take an active part in solving the air pollution problem by pledging to drive smarter on Spare the Air days. What does it mean to drive smarter? Simply put, it means carpooling, trip linking and using public transportation when possible.

Many people who need their car for business think they cannot carpool. But they can share the ride with someone who has a stationary job. Even those who cannot easily carpool daily can make an effort to share a ride on a few Spare the Air days each summer.

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Clarification of Emergency Generator Use

Recently, District inspectors have observed the use of emergency, stand-by electrical generators during non-emergency conditions. The unauthorized use of these internal combustion engine units normally takes place during extremely hot weather, when demands on the electric power grid are high.

Director of Compliance Robert Kard explained that in many cases, the use of these generators is prompted by a request of the California Independent System Operator Corporation (ISO) to cut power consumption. Some facility operators have agreements with the ISO to reduce electrical power use upon request. They accomplish this by disconnecting from the power grid and generating their own electrical power. In exchange, facilities receive various benefits.

Unfortunately, Kard said, "This is a violation of the law, because these facilities are only permitted to operate generators for maintenance, testing, and providing emergency power to their facilities." Unforeseen power failures beyond a facility's control are considered emergencies, while voluntary curtailments are not.

The District has several concerns with the unnecessary operation of the generators. First, the permit to operate does not authorize use of stand-by generators during non-emergency

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GOVERNING BOARD REVIEW

The Governing Board took the following action during the June 15th Governing Board Meeting:

- Adopted amendments to Rule 3020 (Permit Fee Schedules) for Schedules 11 and 13.
- Adopted the District's 2000-2001 Recommended Budget with one modification.
- Lifted funding suspension for municipal heavy duty, low-emission engine projects located in Fresno County.
- Received and filed Progress Report to the PM10 Attainment Demonstration Plan. Set August 17, 2000 for the Public Hearing to Consider approval.
- Approved contract with Atmospheric Analysis and Consulting, Inc. to provide laboratory analysis.
- Approved Amendment 1 to the REMOVE program Contract #97-060 with the City of Tulare to extend the term of the Contract to March 15, 2001.
- Accepted Carl Moyer Program Funds in the amount of \$3,187,452 from the California Air Resources Board, and \$350,000 from the California Energy Commission to be placed in the District's Heavy Duty Engine Emission Reduction Incentive Program.



The next Governing Board meeting will be held on Thursday, August 17, at 9:00 a.m. in the District's Fresno office, and via video-teleconference in the Modesto and Bakersfield offices.

Driving

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What's in it for you?

In addition to providing much-needed air quality improvements, even carpooling occasionally offers participants many other benefits:

- Reduces the \$3,000 annual average vehicle operating cost by lowering gasoline consumption and vehicle wear and tear.
- Less time behind the wheel means more time to read, pay bills or review business notes.
- Many insurance companies offer carpool discounts due to reduced driving time.



- Some employers offer financial and in-kind incentives to employees who carpool.
- Carpooling can be a stress reliever and fun.

There are situations when carpooling is not a viable option. Anyone who must drive alone can help reduce emissions by linking more trips into a single outing and driving fewer miles. Air friendly options such as teleconferencing, online or catalog shopping and patronizing multiple service centers are just some of the ways to Spare the Air while saving time and money.

Clean Air Trivia

What percentage of workers in the San Joaquin Valley use an alternative commute option such as carpooling, public transit or pedal power?

- a) 10 percent
- b) 18 percent
- c) 24 percent
- d) 30 percent

Answer on page 3

Generator

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conditions. Second, the emissions exceed what the units were permitted to have and may pose a significant public health risk — especially those from diesel engines. Lastly, increased use of the generators will lead to accumulated exhaust fumes during stagnant weather conditions and may result in public nuisances.

The most important reason not to run emergency equipment to save power, however, is that the exhaust emissions come at the worst possible time of year for air quality.

“The additional air pollution generated by these stand-by engines during the smoggy season makes a bad situation even worse,” Kard said.

The District reminds anyone wishing to operate an emergency generator under curtailment conditions that they must first apply for and receive a revised permit to operate. The permit application will undergo a careful review and additional emission controls or offsets may be required. For more information on permitting or compliance issues, please call the District at (559) 230-6000.

BUMP-UP**Continued from page 1**

would reduce volatile organic compound (VOC) emissions from architectural coatings, solvent degreasing, commercial charbroiling, organic liquid storage, well cellars, and organic solvent waste.

When USEPA's action becomes final, a new set of plan and rule development timelines will start for the District. For instance, the District must adopt the six measures described above within 18 months of the effective date of the final finding and implement the rules no later than November 15, 2002. The rules must achieve the 8.09 tons per day reductions projected in the attainment plan.

Since development for the six VOC rules is currently underway, adopting the rules and obtaining USEPA approval before the sanction clock expires is plausible.

An issue that will pose a significant challenge to the District, however, is finishing a new Attainment Demonstration Plan and gaining EPA approval by mid-2002 in order to meet an 18-month deadline.

What does this mean for business?

The bump-up and the ensuing Attainment Demonstration Plan will place a greater responsibility for further emission controls on Valley businesses and industry. As previously reported in Valley Air News, in severe non-attainment areas, the definition of a major source for both VOCs and Nitrogen Oxides (NOx) changes from 50 tons to 25 tons per year. Additionally, the new minimum offset threshold increases from 1.2:1 to 1.3:1.

As a result of these requirements, the District will have 180 days to amend Rules 2201 (New and Modified Stationary Source Review) and 2520 (Federally Mandated Operating Permits) to reflect these changes. Affected sources must submit Title V

permit applications to the District within one year of the adoption of the rule amendments. The District is required to take action on the permits within 18 months of receiving a complete application.

Supervising Air Quality Engineer Scott Nester explained that while permitted sources continue to bear responsibility for emission reductions, attaining the standard will be impossible without additional emission reductions from mobile sources. "Simply stated, without unprecedented cooperation between the District, transportation planning agencies, the California Air Resources Board (ARB), and stakeholders, the Valley will not meet the federal ozone standard by 2005," Nester said. "This cooperation, creativity and vision will be crucial in reducing emissions from passenger, commercial transport and transit vehicles." Continued, aggressive mobile source tailpipe strategies from the ARB and USEPA, especially with heavy-duty diesel trucks, will be particularly critical to the Valley's success in recording sufficient clean air data to show attainment.

Attaining the federal one-hour ozone standard calls for substantial effort and considerable investments from both mobile and stationary sources. Nester explained that because the most cost-effective measures have already been achieved, a thousand dollars spent today on emission reductions will garner less benefit than the same amount spent five or ten years ago. "We'll need to build on the large emission reductions of the past with smaller reductions of more numerous control measures," he said.

Each control measure by itself may seem small, but every one will add to the overall reduction strategy.

The next version of the District's ozone strategy will also include some control measures that are not the typical command and control rules. These could include voluntary

episodic measures, the REMOVE and Heavy-Duty Engine incentive programs, and additional restrictions on the use of old Emission Reduction Credits.

While the efforts and investment to meet the deadlines will be great, the price of failure would be greater still. Should the District fail to submit an attainment demonstration plan or revise the rules on time, the Valley would be subject to two sanctions. First, the two to one offset sanction would require a company that is constructing a new facility or modifying an existing one to reduce two tons of VOCs or NOx emissions for every new ton emitted. In the event that the District should fail to obtain approval of the attainment demonstration plan and rules six months after the first sanction is imposed, a second sanction would apply. This sanction would prohibit the U.S. Department of Transportation from approving or funding all but a few specific types of highway construction projects.

Though mandates and sanctions are compelling reasons for residents, permitted sources, local government and the District to work together to meet air quality standards, the most important reason is clean, healthy air to breathe. The Valley Air District remains committed to ensuring a healthy future for all Valley residents.

The USEPA's web site, www.epa.gov/region/09, contains a copy of the proposed bump-up rule within the programs section.

Clean Air

Trivia

Only 24 percent of San Joaquin Valley residents use an alternative transportation mode for commuting. What's keeping the other 2,432,000?

Answer