



Central Valley Air Quality Coalition's

Pollution-Reduction Recommendations

San Joaquin Valley 2017 Plan for the 2012 PM2.5 Standard

Agriculture

- **Limit Biomass and Ban Open Burning:** Biomass burning is a significant source of direct PM2.5, yet in 2016 the Air District allowed close to 2,000 acres of biomass to be openly burned in the Central Valley. Open burning of agricultural waste should be completely banned and incentives for mulching waste like those provided by the U.S. Department of Agriculture should be provided.
- **Regulate Agricultural Equipment:** For over five years ARB has promised to implement an enforceable rule on Agricultural equipment. A rule is necessary for attainment in both ozone and PM plans. We also need to regulate Agricultural pumps (internal combustion engines). Having been heavily incentivized, it is time for all Ag. Equipment to be subject to an enforceable rule to utilize the cleanest available technology.
- **Update Conservation Management Practices (CMPs) and Require Emission Reduction Plans from Growers:** CMPs are activities farmers can implement to reduce dust emissions from on-farm sources. While farming techniques and technologies have greatly evolved over the last ten years, the list of available CMPs has not been updated since 2004. For instance, the Almond Board has approved new harvesting technologies that reduce particulate matter by 30%. CMPs should be updated to reflect current practices and new technologies and farmers should be required to demonstrate actual on-farm emission reductions.
- **Regulate Ammonia:** Ammonium nitrate, composed of ammonia and NO_x, is the largest component of the Valley's PM2.5 levels and contributes significantly to levels that exceed the national standards. Compared to NO_x, which has already been heavily regulated, ammonia has been historically under-regulated and represents

the cheapest opportunity for emission reductions. The EPA has already asked the District to regulate ammonia. We'd like to see a 70% reduction in ammonia modeled to determine its significance as a precursor.

Transportation

- **Add the San Joaquin Valley to areas of focus within ARB's Mobile Source Plan, including additional actions to deploy cleaner technologies.**
 - Accelerate timelines within the Mobile Source Plan for San Joaquin Valley: accelerate the setting of in-use emission performance standards and a low-NOx engine standard; accelerate deployment of zero-emission drayage and last-mile delivery trucks; accelerate deployment of zero-emission airport shuttle busses, forklifts, and transportation refrigeration units. Accelerate the change of construction fleets to Tier 4 standards.
 - Institute more aggressive targets for purchase requirements for zero-emission last-mile delivery trucks and bus fleets. Institute a zero-emission drayage truck rule.
- **Expand the Indirect Source Review (ISR) Rule:** The ISR rule plays an important role in minimizing pollution from urban development. The District could expand the applicability of the rule to include new agricultural operations, such as traffic emissions between operations (i.e. milk processor, dairy, feedlot). In addition, the District should add limits on PM2.5 emissions and increase the emissions reductions required for projects.
- **Institute Clean Public Fleets:** The District has the authority to adopt next-generation standards for fleets with zero-emission requirements on all publicly-owned vehicles in the San Joaquin Valley.

Oil & Gas

- **Amend the Flare Rule to incorporate required and enforceable minimization plans for operators, small and large:** At present, Valley oil producers have no incentive to decrease flaring. North Dakota has a flare rule that requires operators of natural gas facilities to capture 74% of all natural gas, and by 2020, increase the capture rate to 90%. If operators do not meet the targets, the Commission can reduce flared gas by restricting oil production. The District could borrow from this approach to reduce flaring.
- **Enhanced NOx and PM2.5 control requirements for boilers and steam generators, with a focus on transitioning to solar-powered boilers and generators.**

- **Emission Reduction Credits:** Require the expiration of credits after 10 years and reduce their value by 5% annually.
- **Explore additional NO_x and PM_{2.5} controls for non-agricultural** internal combustion engines - including those in the oil and gas sector.

Other

- **Glass Melting Manufacturing:** Require more stringent NO_x, SO_x and PM_{2.5} emission limits to facilities manufacturing glass, making the applicable rules similar to South Coast's (0.24 lbs NO_x/ton of glass pulled utilizing the "Ultra Cat ceramic filter system").
- **Ban Fireplaces in New Development, Lower the Burn Threshold and prohibit all** devices from burning on a day expected to exceed 12 ug/m³ in PM 2.5 levels. The District should, like the the Bay Area Air Pollution Control District already has, ban fireplaces in all new homes and ban the use of fireplaces when PM_{2.5} concentrations exceed air quality standards.
- **Update the Charbroiling Rule to include under-fired charbroilers:** Under-fired charbroilers emit direct PM_{2.5}, yet the District has delayed updating the charbroiling rule to include the under-fired variety. The Bay Area Air Quality Management District has already implemented regulations on under-fired charbroilers.