

APPENDIX F

Suggested Control Measures



EXTREME OZONE ATTAINMENT DEMONSTRATION PLAN

SUMMARY OF PUBLIC SUGGESTIONS FOR EMISSION CONTROL MEASURES TO BE CONSIDERED FOR IMPROVING OZONE AIR QUALITY

Control Measure Suggestion	Source	Ozone Precursor	District Authority?	District Response
Stringent requirements such as low emissions thresholds would help us improve air quality as it has done in the South Coast Air Basin. The District should seek every possible means to reduce air emissions; self-classifying as extreme would help us implement more stringent measures, which would in turn help meet the federal 8-hr ozone standard.	July 2003 Workshop	VOC and NOx	Yes	The current plan is directed towards demonstrating attainment of the federal 1-hour ozone standard. California thresholds applicable to the District are already as stringent as federal extreme thresholds except for the offset ratio, which would go from 1.3 to 1 to 1.5 to 1. A change in threshold is also affected by the final rule implementing the 8-hour ozone standard.
How are emissions from landscaping equipment addressed?	July 2003 Workshop	VOC and NOx	Limited	Staff responded that most of the reductions result from equipment change-out. The ARB has significantly reduced emissions from lawn equipment engines. Using all-electric equipment is an option, but it may not be feasible for commercial landscaping operations. The District is planning to look at emissions from leaf blowers.
Does the ozone plan consider emission sources such as trucks that are allowed to enter the United States from Mexico? Does the plan also account for any federal relaxation of emissions standards?	January 2004 Workshop	VOC and NOx	No	Any emission estimates that change during plan development will be incorporated to the extent possible (at some point in time the inventory is locked and no further changes are considered—see Chapter 3). These changes can include new sources such as international trucks or changes in federal or state laws that increase or decrease estimated emissions from affected sources.
Seventeen percent of volatile organic compound (VOC) emissions come from animal manure; could you address control measures such as anaerobic digestion to reduce these emissions?	July 2003 Workshop	VOC	Yes	The District is looking at anaerobic digestion as one of the control measures for confined animal feeding operations. Results from studies underway will allow the District to better estimate emissions and to develop viable control measures. This <i>Extreme OADP</i> discusses control measures for this source category in Chapter 4.

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The Ozone Plan should include an emissions rule for new micropower (electric generators used as an alternative to or supplement of the state power grid and located near or at the end point of electricity use), or distributed generation units located in the San Joaquin Valley.	January 2004 Workshop	VOC and NOx	Yes	A rule addressing this request has been included in the Extreme OADP. See Table 4-1 in Chapter 4.
Expanding transit services between the Bay Area, Sacramento and the Valley is a long term and laudable goal. In the short term, coordination of the existing rideshare programs in the Bay Area, Sacramento, and the San Joaquin regions can reduce air pollution and congestion.	Letter to District	VOC and NOx	No	Suggestion noted and will be forwarded to agencies with authority to implement.
Voluntary removal of long-haul trucks from Highway 99 and Interstate 5 through the SJVAB by constructing and operating travel centers on these corridors that give time of day discounts for stopping at the travel centers	Letter to District	VOC and NOx	Yes	Through its incentive programs, the District is working on truck stop electrification to reduce emissions from idling trucks. However, these projects use existing locations of travel centers and do not address the part of the suggestion that calls for more strategically located travel centers to reduce truck traffic during commute hours.
Rather than moving truckloads of goods in the usual manner on highways, the District should look at the emission reduction benefits of using smaller day-cab tractors to load and unload trailers at customer facilities in preparation for transportation across states.	Letter to District	NOx and VOC	No	Suggestion noted and will be forwarded to agencies with authority to implement.

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The District should create a rule that controls emissions from drive-thrus.	July 2003 Workshop; Verbal comment to District Staff	NOx and VOC	No	Emissions from drive-throughs could be controlled by land use decisions on drive-through restaurants (e.g., banning them in certain areas), restricting operating times of the drive-through component, or reducing emissions from vehicles using drive-through features. The first two types of controls listed are primarily under the purview of local government land use decisions, and the third is under the authority of the California Air Resources Board. Suggestion noted and will be forwarded to appropriate agencies.
SB700 requires us to modify our burn rules by July 2005. The District needs to include this in the rules being studied for the ozone plan.	January 2004 Workshop	VOC and NOx	Yes	Open burning rules are included in this <i>Extreme OADP</i> (Chapter 4).
If the state would give a fuel tax cut on a fuel incentive to companies and truck owners coming and going to Los Angeles traveling on Highway 395 it would eliminate a lot of pollution in the central valley due to trucks.	Letter to District	VOC and NOx	No	This general concept is included in Chapter 4 as an idea to study in the future to determine if a viable control measure could be developed.
All sources contributing to air pollution should pay to clean up the air, not just industry or agriculture. Perhaps a fee could be charged to new residents who move to the area or who drive long distances, the collected funds used for air quality improvement programs.	December 2003 Workshop on Extreme Nonattainment	VOC and NOx	Yes	This concept is being addressed in the Indirect Source Rules (ISR) now being developed by the District.

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Buses are driving around half full and the schedules are inadequate; we need to work on a commuter friendly transportation system to where it is the first choice over cars for commuting.	December 2003 Workshop on Extreme Nonattainment	VOC and NOx	Limited	Operation Clean Air has started work addressing non-regulatory air quality improvements such as these. The Regional Transportation Planning Agencies evaluate and implement measures to improve transit ridership. In addition, the District is getting involved in ISR & fleet rules to help reduce other mobile source emissions.
Regarding the issue of increased truck traffic in the SJVAB, the District should investigate other avenues for moving goods, such as small barges on our system of irrigation canals. This would represent a low- or no-emission process for moving goods.	December 2003 Workshop on Extreme Nonattainment	VOC and NOx	No	Suggestion noted.
The District should consider using natural sources as buffer zones to capture some of these ozone emissions after they have been released. The uses of buffer zones have already been examined by cities and industry. The District should look at planting extremely fast growing trees with deep root systems of hardwood that will improve air quality.	August 2004 Workshop on Extreme Ozone Attainment Demonstration Plan	No	No	The District will add a future study measure regarding the role of urban landscape management in improving air quality.
The District should include Alternative Emission Reduction Programs as a viable and proactive approach to future air quality planning.	Written comments, submitted August 25, 2004	Yes	Yes	The District will investigate alternative approaches and will add some text to the section.

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The District should consider creating urban tree planting guidelines to facilitate the urban landscape's role in improving air quality.	August 2004 Workshop on Extreme Ozone Attainment Demonstration Plan	VOC	Limited, but suggestion is for guidelines	The District will add text to the plan regarding a measure for future study in the area of research, education and outreach regarding the role of urban landscapes and agricultural land use on ozone air quality.

