



San Joaquin Valley  
Air Pollution Control District

California Clean Air Act  
Triennial Progress Report and Plan Revision  
1997-1999

March 15, 2001

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UNIFIED AIR POLLUTION CONTROL  
DISTRICT**

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TRIENNIAL PROGRESS REPORT AND  
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# INTRODUCTION

## **BACKGROUND**

In 1991, the San Joaquin Valley Unified Air Pollution Control District (District) prepared the *Air Quality Attainment Plan (AQAP)* in compliance with the requirements of the California Clean Air Act (CCAA). The AQAP was adopted by the District's Governing Board on January 30, 1992 and conditionally approved by the California Air Resources Board (ARB) on August 27, 1992.

Section 40924 of the California Health and Safety Code (CH&SC) requires that a report be prepared every three years that summarizes the progress made by the District in meeting the schedules for developing, adopting and implementing the air pollution control measures contained in the District's plan. This Triennial Update is a report of the District's progress in relation to the commitments made in prior state attainment plans. Previous triennial reports have assessed progress made during the last three years, including the immediate year ending on the date the report is due. This report, and future reports, will assess the previous three years, not including the year ending on the date the report is due. In other words, this report, nominally due on December 31, 2000 will cover years 1997-1999 rather than 1998-2000. This change allows a more thorough assessment of the actions taken during the three-year period and also aligns the triennial plan with the federal three-year rate of progress assessment period.

Chapter 8 (*California Clean Air Act Triennial Progress Report and Plan Revision*) of the 1994 *Ozone Attainment Demonstration Plan (OADP)* fulfilled California's requirement for the first triennial report. The 1994 OADP was prepared with the use of the San Joaquin Valley Air Quality Study/Atmospheric Utilities Signatures, Predictions, and Experiments Regional Modeling Adaptation Project (SARMAP) model as required by the Federal Clean Air Act. SARMAP was used to project the measures and amount of reduction needed to achieve attainment of the federal standard. The strategy adopted in the 1994 OADP identified measures capable of achieving attainment of the federal standard and was submitted as a portion of the State Implementation Plan (SIP). Chapter 8 identified additional measures that were anticipated as necessary to attain the state standard and notes that these additional measures would not be developed until after the adoption of the rules committed to in the OADP.

The 1994 OADP recognized that to achieve air quality goals, a partnership was necessary between a wide variety of agencies and groups at the federal, state, regional and local levels. The United States Environmental Protection Agency (EPA) is responsible for reducing emissions from a number of sources including locomotives, aircraft, heavy duty vehicles used in interstate commerce, and other sources which are either preempted from state control or best regulated on a national level. The ARB is responsible for emission standards for on-road and some off-road motor vehicles and for consumer products sold in the state. The District is

responsible for stationary and area source controls. Transportation Planning Agencies (TPAs), cities, counties, and other agencies concerned with land use and transportation, in coordination with the District, are responsible for mobile source measures to reduce vehicle emissions.

The *California Clean Air Act Triennial Progress Report and Plan Revision 1995-1997* (1997 Triennial Update) was adopted in December 1998 by the District and approved by the ARB in October 1999. No change in the District's ozone attainment strategy was set forth in the Update. In the Update, however, the District revised its rulemaking schedule for developing rules to which the District was already committed. Also, the District committed to further evaluate 12 control measures included on the ARB's list of Achievable Performance Standards. ARB conditionally approved the District's 1997 Triennial Report, subject to the District adopting 8 specific measures no later than the end of 2000, and the District prioritizing 18 additional identified measures and adopting at least four per year during the 2001-2003 and 2004-2006 planning cycles.

As the District makes progress in implementing the strategies set forth in the 1994 SIP and adopting the measures identified in the 1997 Triennial Update, both ARB and EPA must also continue to take resolute actions to reduce emissions generated by the sources they control. Local governments must emphasize land use patterns and site designs that minimize air emissions and TPAs must make a concerted effort to ensure that their decisions result in air quality improvements. As part of the Transportation Equity Act for the 21<sup>st</sup> Century (TEA 21), Congress approved \$120 million in Congestion Mitigation and Air Quality Improvement (CMAQ) funds for TPAs in the San Joaquin Valley between 1997 and 2003. TPAs thus have a unique opportunity to fund projects that will result in significant emission reductions. It is imperative that significant mobile source emission reductions do occur in the Valley if air quality goals are to be achieved.

### **ATTAINMENT DESIGNATION**

Based on the designation criteria established by Section 40921.5 of the California Health and Safety Code, the San Joaquin Valley Air Basin (SJVAB) is classified as severe nonattainment for ozone. Because of this designation, the District is subject to stringent requirements in the CCAA and must apply all feasible measures to reduce emissions.

Through control measures adopted by state, local, and federal agencies and implemented by citizens, industry, and government, all areas in the SJVAB have attained the California carbon monoxide (CO) standard (the last area, Fresno, was officially reclassified as attainment in September 1999). The remainder of this document focuses on ozone attainment issues.

## **AIR BASIN DESCRIPTION**

The San Joaquin Valley (Valley) is a major geographic, population, and agricultural region of California. The District, and the corresponding air basin, includes the counties of San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare and the Valley portion of Kern County. Comprising about 24,840 square miles, it represents approximately 16% of the geographic area of California and is the second largest air basin in California. The California Department of Finance estimates that the District had a population of 3,174,400 on January 1, 2000. Major urban centers include Bakersfield, Fresno, Modesto and Stockton.

The Valley consists of a continuous inter-mountain valley that is approximately 250 miles long and averages 80 miles wide. It is defined by the Sierra Nevada mountains in the east (8,000 to 14,000 feet in elevation), the Coast Range in the west (averaging 3,000 feet in elevation), and the Tehachapi mountains in the south (6,000 to 8,000 feet in elevation). The Valley opens to the Carquinez Straits in the north where the San Joaquin-Sacramento Delta empties into San Francisco Bay. Except for its foothill and mountain areas, the SJVAB is essentially flat with a slight downward gradient to the northwest.

Approximately 31 percent of the total land area within the SJVAB is under public ownership. The federal government is the largest public landholder, with approximately 94 percent of the total public-owned land under its jurisdiction. For the most part, the holdings consist of National Forest lands, National Parks, wildlife refuge areas, plus a major military air base located on the Valley floor.

The Valley is predominately agriculturally oriented, including foothill and mountain areas devoted to grazing and timber sales. Currently, the majority of industry remains directly or indirectly related to providing services, products and support to agriculture. In addition, industries related to the production of natural resources are scattered throughout the District. Various lumbering operations that process timber harvested from the nearby National Forests and private forestlands are located along the east side of the District. The District also has substantial petroleum production fields in Kern, Kings, Tulare, and Fresno counties, while oil refineries are located in Kern County.

## **AIR QUALITY INDICATORS**

Violations of the state and federal standards between 1990-1991 are shown on Table 1.

ARB's *Guidance for Annual and Triennial Progress Reports Under the California Clean Air Act* (August, 1993) suggests that districts use the following air quality indicators to fulfill the reporting requirements for the Triennial Update: 1) expected peak day concentration (EPDC); 2) per-capita annual exposure; and 3) per-unit-area annual exposure. District staff, analyzing the latest data obtainable from ARB,

**TABLE 1**  
**SJVAB OZONE EXCEEDANCES**  
**1990-1999**

Year	State Standard (0.09 parts per million)		Federal 1-Hour Standard (0.12 parts per million)	
	Hours	Days	Hours	Days
1990	711	133	101	45
1991	788	134	149	51
1992	735	132	70	29
1993	743	126	126	43
1994	808	118	111	43
1995	807	124	139	44
1996	936	122	163	56
1997	586	112	38	16
1998	801	90	157	39
1999	775	122	62	28

prepared charts showing EPDC trends, population-weighted ozone exposure, and area-weighted ozone exposure. The exposure charts include a confidence scale (on the right hand side of each chart) that incorporates the concept of native variability<sup>1</sup> for each indicator. We will provide a confidence scale on the EPDC charts when we receive the necessary data from ARB.

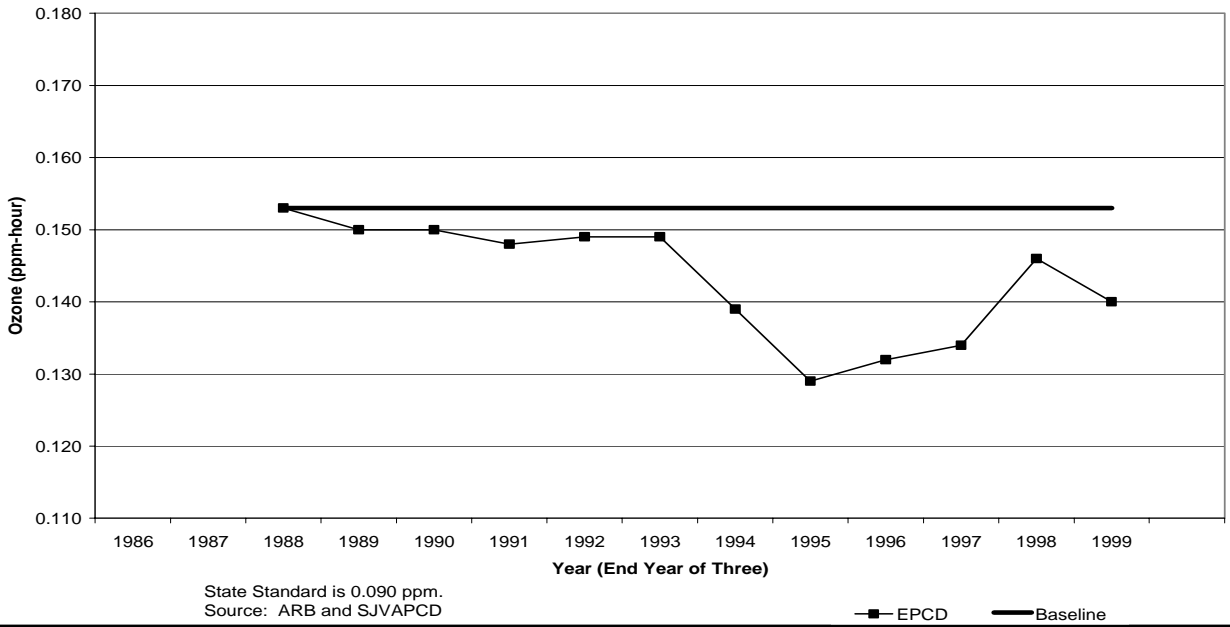
The EPDCs are shown for seven air monitoring stations: Fresno-Drummond, Fresno-Sierra Sky Park, Parlier, Edison, Clovis, Fresno-First Street, and Arvin (see Figures 1-7). The first four sites meet the conditions for using EPDC as an air quality indicator. These conditions are: 1) continuous operation since 1986; and 2) highest recorded EPDC during the reporting period or the EPDC is within ten percent of the highest EPDC recorded in the SJVAB. The last three sites were established later than 1986 but otherwise meet the conditions. In fact, the Clovis site has the highest EPDC in the valley. The EPDCs for all 23 currently operating sites within the SJVAB are shown in Appendix A. The EPDCs for 17 of the 23 sites in the SJVAB decreased (some by only one part per billion), five out of 23 increased, and one site had data for only 1999.

In general, most air monitoring sites show improvement of EPDCs throughout the District. As indicated on the charts, most improvement occurred in the late 1980's and very early 1990's. Progress slowed from the early 1990's until the late 1990's. Specifically the EPDC Figures 1-4 and 6-7 show one of the two types of progress. Figure 5 (Clovis) shows documented degradation. The greatest improvements are at Arvin, Parlier, and Edison. The Fresno-First Street site showed virtually no

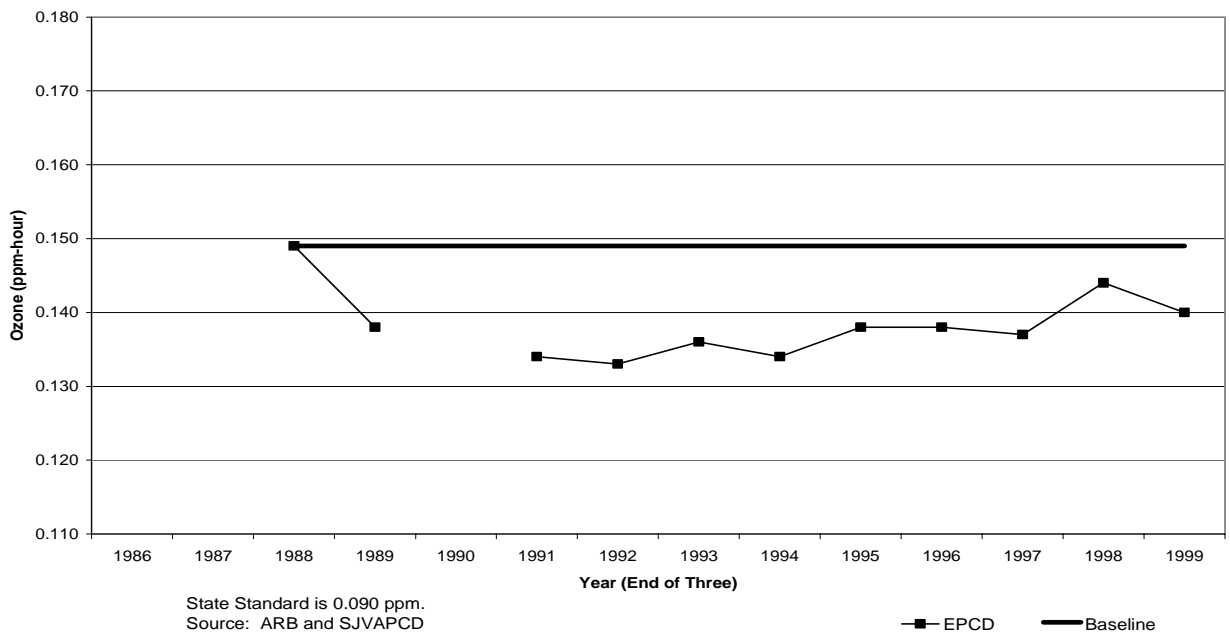
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<sup>1</sup> Native variability is defined by ARB [Guidance for Annual and Triennial Progress Reports Under the California Clean Air Act (August, 1993)] as "the spectrum of values that the indicator could have because of the influence of factors other than progress." The difference between the baseline and the percentile values listed on the confidence scale equals the amount of change that can be attributed to emissions reductions at a confidence level equal to the percentile value. For example, a 1.0 part per hundred million decline in EPDC, measured from the baseline to the 95% level mark on the confidence scale, represents the decline in exposure that can be attributed to emissions reductions with 95% confidence.

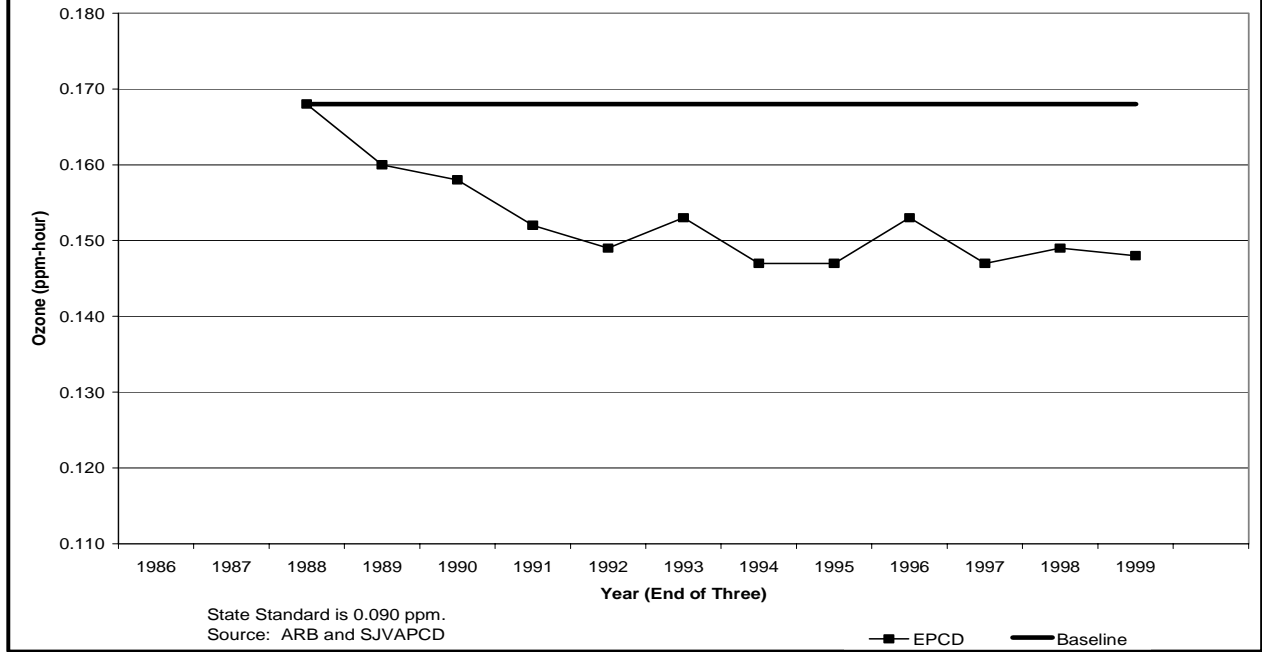
**Figure 1**  
**Progress in Reducing Expected Peak Day Concentration at the Fresno-Drummond Site**



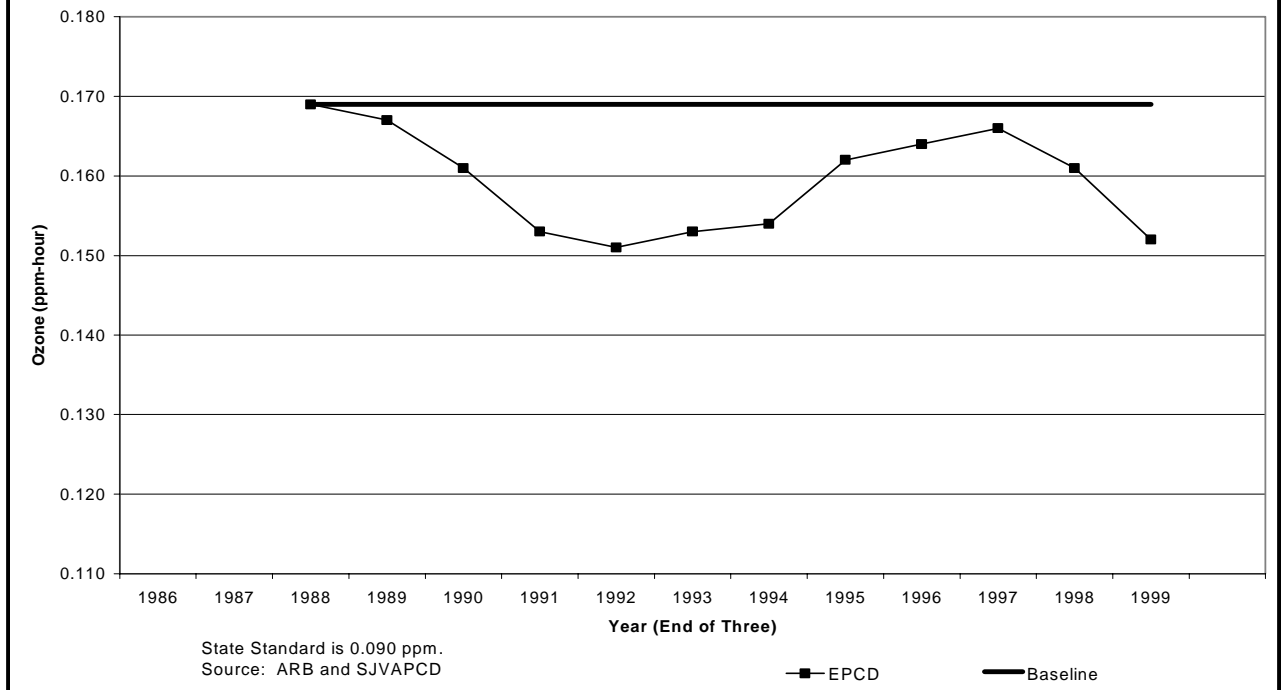
**Figure 2**  
**Progress in Reducing Expected Peak Day Concentration at the Fresno-Sierra Skypark Site**

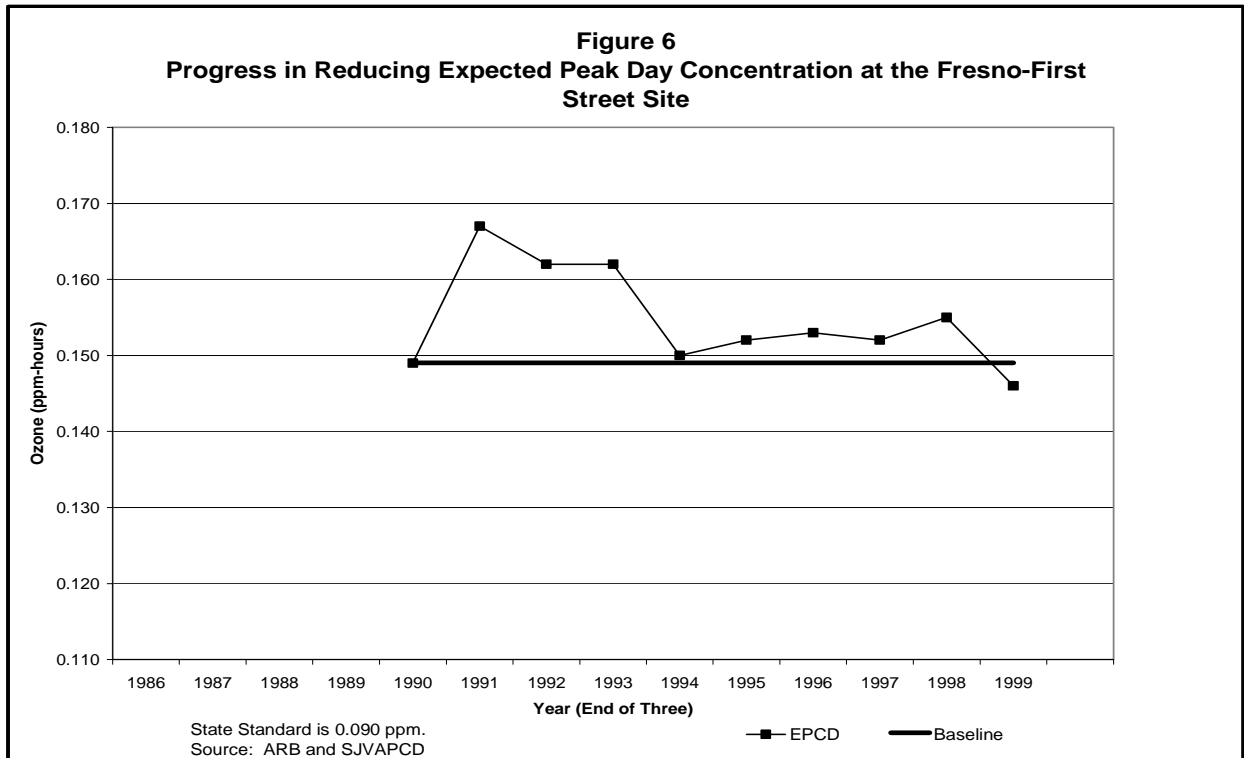
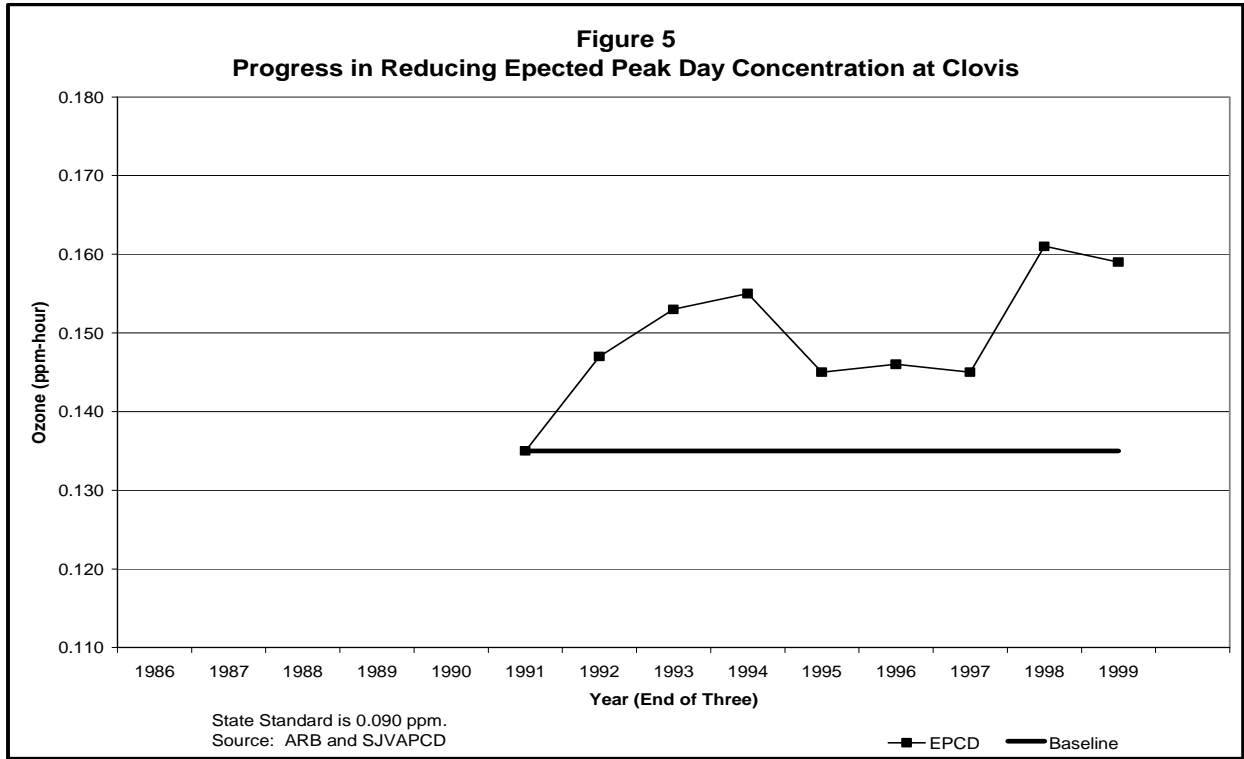


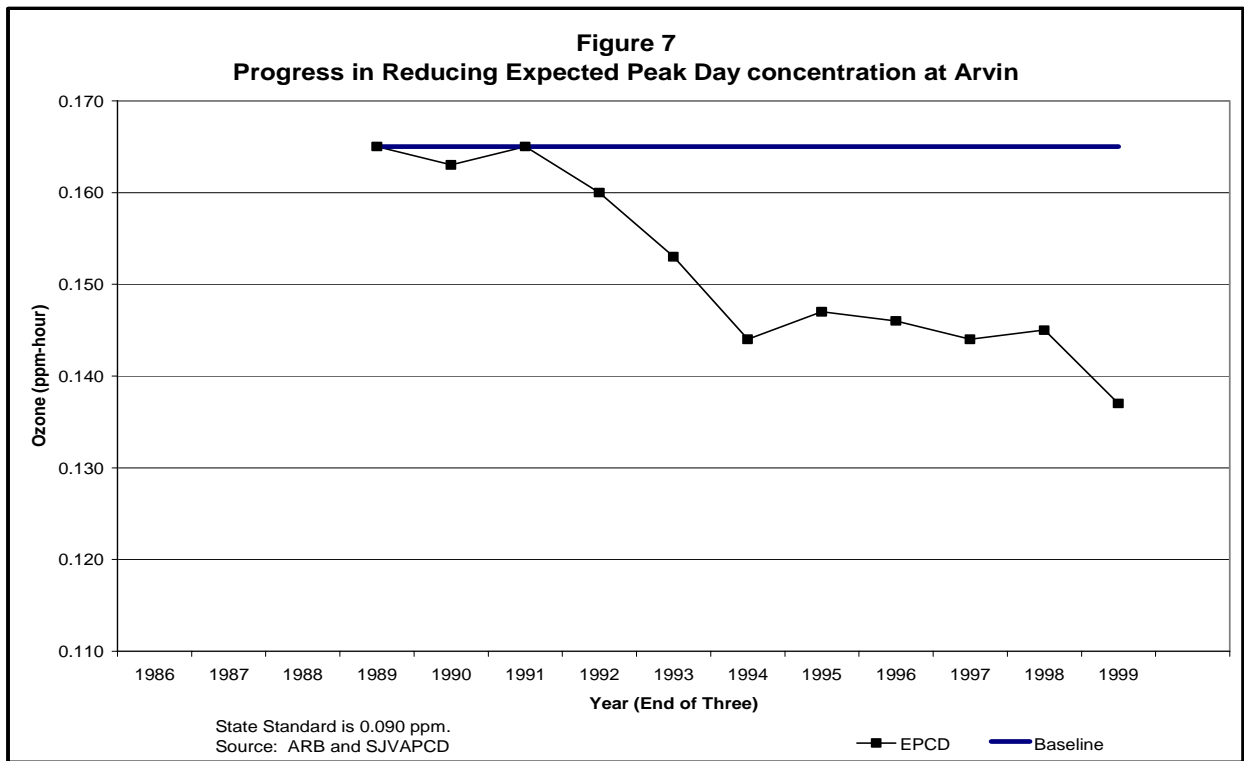
**Figure 3**  
**Progress in Reducing Expected Peak Day Concentration at Parlier**



**Figure 4**  
**Progress in Reducing Expected Peak Day Concentration at Edison**







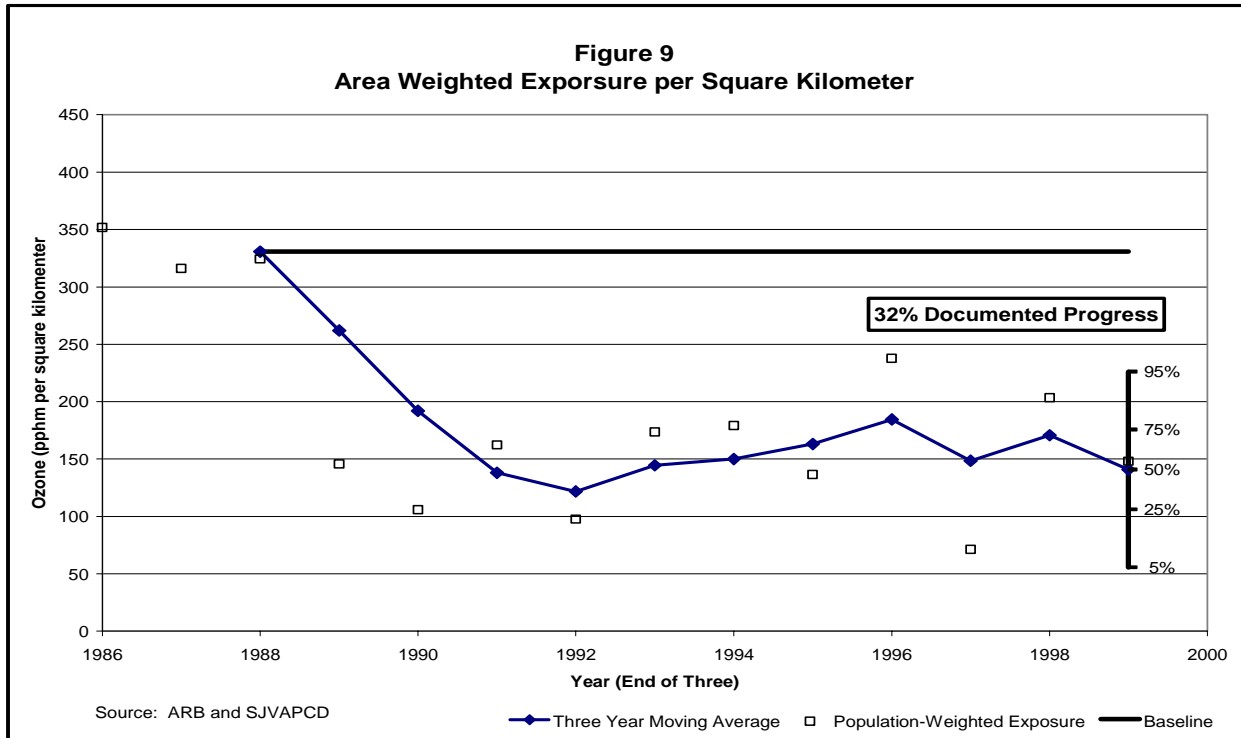
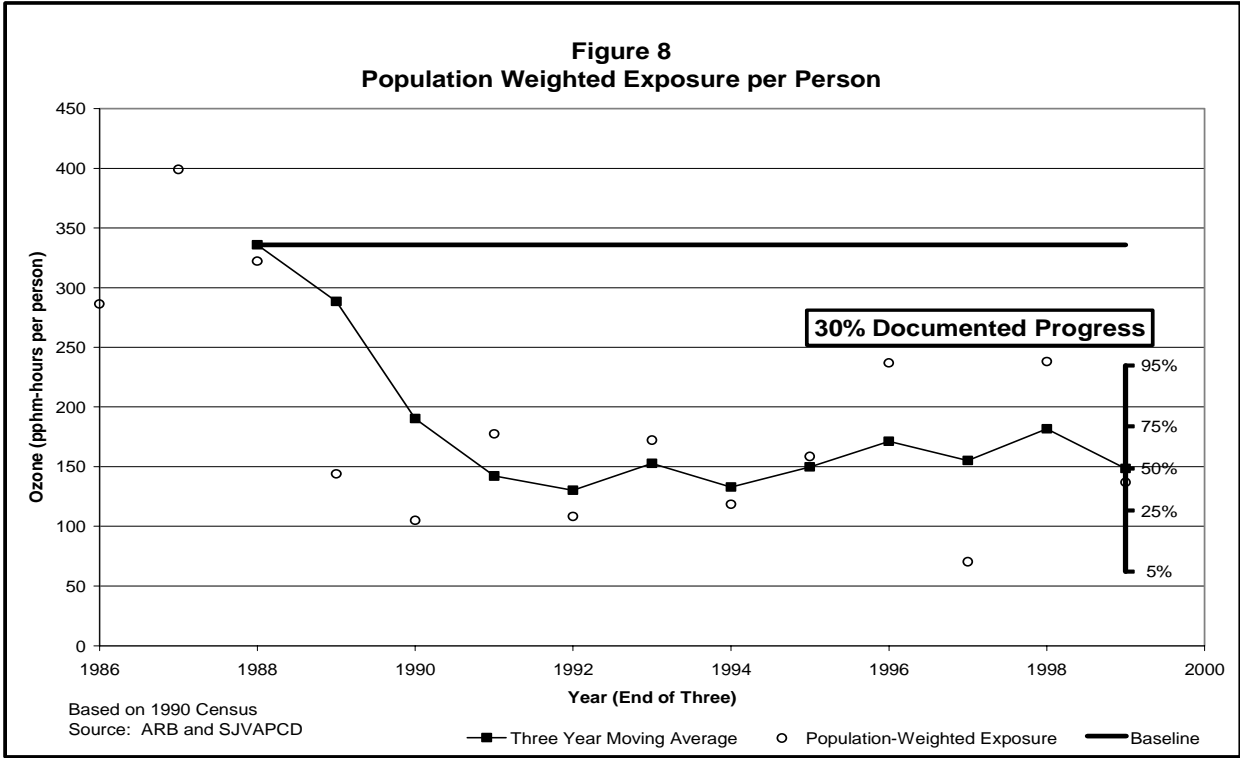
improvement, while the Clovis monitoring station showed increasing levels of air pollution.

The confidence scale or "error bar" on the right edge of each exposure chart shows different types of progress or degradation of air quality. The first type is called 'documented progress.' Documented progress refers to the space (or gap) between the 95 percent mark on the confidence scale and the baseline when the baseline is above the 95 percent mark. This means that there is a 95 percent certainty that the indicated progress has been made. The second type of progress occurs when the confidence scale crosses the baseline. This type of progress is less certain than that of documented progress. The percentage of confidence is determined by the intersection of the two lines and allows us to state that we are 'X' percent certain that some progress has been made. Having the five-percent mark above the baseline indicates documented degradation.

The population-weighted exposure chart (Figure 8) shows, with ninety-five percent confidence, that exposure to ozone (adjusted to reflect population distribution and to give more "weight" to higher ozone values) has declined (approximately 101 pphm per hour per person) within the SJVAB between 1986 and 1999. The decline is determined by taking the difference between the baseline value for 1988 (which is the end year for the 1986-1998 moving average) and the value at the 95th percentile of the confidence scale in the last year shown on the chart. Although this is a documented 30 percent improvement over 1988, the data does not indicate any improvement in air quality since 1992.

The area-based exposure chart (Figure 9) shows greater improvement in air quality within the District. This chart shows, with ninety-five percent confidence, that the SJVAB has experienced a reduced average ozone exposure (approximately 105 pphm-hr per square kilometer) during the 1986 to 1999 time period. This reduction is determined by taking the difference between the baseline value for 1988 (which is the end year for the 1986-1998 moving average) and the value at the 95th percentile of the confidence scale in the last year shown on the chart. Again, although this is a documented 32 percent improvement since 1988, the data does not indicate any improvement in air quality since 1992.

Section 40920(c) of the CH&SC requires that for "severe" nonattainment areas, control measures must be sufficient to reduce overall population exposure to ambient pollution levels in excess of the standard by at least forty percent by December 1997, and fifty percent by December 2000. Although the District adopted rules that reduced ozone precursor emissions by 226 tons per day since 1991, it has been unable to achieve this goal. The measures that were adopted reduce emissions for most major ozone precursor sources in the District. However, the full compliance date for most rules adopted between 1995 and 1999 is 2000 or 2001. Thus, the full benefit of these reductions has not been realized in the District. Even if the District had been able to adopt all control measures committed to in the 1994 Triennial Update, it is unlikely that the pollution levels would have dropped to the required level.



## TRANSPORT MITIGATION

The movement of air pollutants across jurisdictional boundaries is called long-range transport, or simply transport. ARB, in cooperation with local air districts, is required by the CCAA to evaluate intrastate transport and to suggest mitigation for such transport.

Most violations of ozone ambient air quality standards occur under stagnant weather conditions, when pollutant concentrations build up because emitted pollutants do not disperse either horizontally or vertically. For ozone, these conditions occur on hot, summer days with low wind speed limiting horizontal dispersion, and temperature inversions in the atmosphere limiting vertical dispersion. Prevailing winds carry air pollutants and precursors from emission points to downwind locations, mixing with cleaner air or other emissions along the way. Pollutant and precursor concentrations are much lower on windy days because emissions are dispersed through larger volumes of ambient air.

There is general agreement that pollutant transport does occur among the various air districts and air basins in California. The wind direction and resulting transport direction may change significantly from day to day, depending on specific weather conditions. The ARB has identified transport couples (source and receptor areas) throughout California. The San Joaquin Valley Air Basin is identified as both a source and a receptor of transported pollutants.

The ARB concluded that some ozone exceedances in the northern portion of the SJVAB could be overwhelmingly or significantly attributed to transport from the San Francisco Bay Air Basin and that the Broader Sacramento Area contributes significantly to some exceedances in the SJVAB. The SJVAB, however, has been found to contribute overwhelmingly to ozone exceedances in the Mojave Desert, Mountain Counties, and Great Basin Valley Air Basins, overwhelmingly or significantly to the South Central Coast and Broader Sacramento Area Air Basins, and significantly to the North Central Coast Air Basin (CARB, *Second Triennial Review of the Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California, Revised, 1996*).<sup>2</sup>

The state law concerning transport mitigation required the District to adopt and implement Best Available Retrofit Control Technology (BARCT) for 75 percent of the 1987 planning ROG and NO<sub>x</sub> emissions inventories from stationary sources with implementation by January 1, 1994. The evaluation that these rules would meet the requirement was completed in Chapter 7 of the 1991 AQAP. The District, therefore, has complied with this requirement.

Table 2 identifies the BARCT rules adopted by the District since 1991. The majority of these rules were adopted and implemented prior to 1994.

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<sup>2</sup>The *Third Triennial Review of the Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California*, has not been released as of the publication of this update.

**TABLE 2  
BARCT RULES**

<b>VOC BARCT</b>	
<b>Rule</b>	<b>Rule Name</b>
4401	Steam-Enhanced Crude Oil Production Well Vents
4402	Crude Oil Production Sumps
4403	Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities
4404	Heavy Oil Test Station - Kern County
4407	In-situ Combustion Well Vents
4451	Valves, Pressure Relief Valves, Flanges, Threaded Connections and Process Drains at Petroleum Refineries and Chemical Plants
4452	Pump and Compressor Seals at Petroleum Refineries and Chemical Plants
4453	Refinery Vacuum Producing Devices or Systems
4454	Refinery Process Unit Turnaround
4601	Architectural Coatings
4602	Motor Vehicle and Mobile Equipment Coating Operations
4603	Surface Coating of Metal Parts and Products
4604	Can and Coil Coating Operations
4605	Aerospace Assembly and Component Manufacturing Operations
4606	Wood Products Coating Operations
4607*	Graphic Arts
4621*	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
4622*	Gasoline Transfer into Vehicle Fuel Tanks
4624	Organic Liquid Loading
4625	Wastewater Separators
4641	Cutback, Slow Cure, and Emulsified Asphalt Paving and Maintenance Operations
4642*	Solid Waste Disposal Sites
4651	Volatile Organic Compound Emissions from Decontamination of Soil
4652	Coatings and Ink Manufacturing
4653	Adhesives
4672	Petroleum Solvent Dry Cleaning Operations
4681	Rubber Tire Manufacturing
4682	Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing
4684	Polyester Resin Operations
4691	Vegetable Oil Processing Operations
<b>NOx BARCT</b>	
<b>Rule</b>	<b>Rule Name</b>
4305**	Boilers, Steam Generators, and Process Heaters
4352	Solid Fuel Fired Boilers, Steam Generators and Process Heaters
4354*	Glass Melting Furnaces
4701*	Internal Combustion Engines
4703	Stationary Gas Turbines

\*BARCT rules adopted or amended in 1995-1998.

\*\*BARCT for larger units was adopted in 1993. BARCT for smaller units was adopted in 1996.

## CONTROL MEASURE IMPLEMENTATION

### **STATIONARY SOURCE CONTROL MEASURES**

The District's rulemaking schedule and adoption activity for 1997-1999 as developed in the 1997 Triennial Plan is shown on Table 3. ARB's 1993 *Guidance for Annual and Triennial Progress Reports Under the California Clean Air Act* (Guidance) suggests that districts should include comparisons of predicted versus actual reductions for the previous three years in the Triennial Update. This data is shown on Table 4. The planned and claimed control efficiencies are also shown on Table 4. Note that emission reductions described in the 1997 Triennial Report are different from those shown in this report. In Fall 1999 and Spring 2000, Arons Air Quality Service, an independent consultant, updated the District's control measures profiles. For some control measures, the update resulted in a change in emission reductions from those previously shown in District documents. It should also be noted that the reductions shown on Table 4 resulted from actions taken only between 1997 and 1999. In all cases, these were amendments of previously adopted rules that had already resulted in significant emission reductions. These earlier reductions are not reflected in this table.

Emission reductions that are achieved by adopted rules are determined by three factors: control efficiencies, rule penetration, and the inventory of sources. As shown on Table 4, the emission reduction achieved by an adopted rule does not always correspond with the planned reduction. During the planning process, estimates are made of each of the three factors based on available data. During the rule development process, more detailed analysis is undertaken and economic, social, environmental, or other considerations may result in modifications of one or more of these three factors. As seen on Table 4, one or more of the factors for the rules that were adopted between 1997 and 1999 changed by the time of adoption.

For context, Table 5 lists the adoption and final implementation dates of all control measures that were developed into rules subsequent to the adoption of the 1994 Triennial Update. This comparison shows the updated emission reductions and progress of each control measure. As discussed earlier, the data provided on this table reflects only emission reductions attributed to adoption or amendment of rules since 1994 and does not include emission reductions from earlier versions of the rule. Also, as previously mentioned, the District's Control Profiles have been updated. The emissions reductions shown on Table 5 thus are not identical to those shown in the 1997 Triennial Report.

**TABLE 3  
STATIONARY SOURCE CONTROL MEASURES  
1997 TRIENNIAL PLAN RULEMAKING SCHEDULE**

Rule	Control Measure	1997 Triennial Plan Anticipated Rule Adoption Date	1997 Triennial Plan Anticipated Rule Compliance Date
4103	Agricultural Waste Burning/Open Burning	4Q/2000	Post 2002
4354	Glass Melting Furnaces	Adopted 04/16/98	1/1/99
4411	Oil Production Well Cellars	4Q/2000	4Q/2002
4601	Architectural Coatings	4Q/99	4Q/2002
4621 4622	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants/Gasoline Transfer into Vehicle Fuel Tanks	Adopted 06/18/98	5/31/99
4661	Organic Solvents	2Q/99	2Q/2001
4623	Organic Liquid Storage	4Q/2000	4Q/2002
4662	Organic Solvent Degreasing	2Q/99	2Q/2001
4663	Organic Solvent Cleaning, Storage, and Disposal	2Q/99	2Q/2001
4692	Commercial Charbroiling	2Q/2000	2Q/2002

**TABLE 4  
CONTROL MEASURE/ADOPTED RULE COMPARISON**

Rule	Control Measures	Inventory (tpd)	Planned Control Efficiency	Planned Emission Reduction (tpd)	Adopted Rule Emission Inventory (tpd)	Adopted Rule Control Efficiency	Claimed Emission Reductions (tpd)
4607	Graphic Arts <sup>1</sup>	5.64	31%	VOC 1.77	4.21	9%	VOC 0.37
4354	Glass Melting Furnaces	15.94	18%	NOx 2.87	14.84	4.5%	NOx 0.66 <sup>2</sup>
4621 4622	Gasoline Tanks and Dispensing	1.41	14%	VOC 0.20	4.57	50%	VOC 2.29

<sup>1</sup> Rule 4611 was incorporated into Rule 4607.

<sup>2</sup> The 0.66 tpd emission reduction reflects the reductions provided by the implementation of the rule adopted in 1995. The emission reductions expected to be provided by the amended rule, 2.87 tpd, will occur when the various phases become effective between 1999 and 2005.

**TABLE 5  
PLANNED AND CLAIMED EMISSION REDUCTIONS**

Rule	Control Measure	Rule Adoption Date	Rule Compliance Date	Planned NOx, tpd	Claimed NOx, tpd	Planned VOC, tpd	Claimed VOC, tpd
4103	Agricultural Waste Burning\ Open Burning			NQ	NA		
4305	External Combustion Devices Phase 3, Smaller Units (Previous rule # 4306)	12/19/96	5/31/01	7.6	0.55		
4305	External Combustion devices Phase 4, Dryers (Previous Rule # 4307)			NQ	NA		
4308	Asphalt Batch Plant Heaters			0.03	NA		
4354	Glass Melting Furnaces	04/16/98	After 01/01/99	2.87	2.83		
4408	Oil Pipeline Pumping Fugitives					NQ	NA
4409	Oil Production Flashing Losses					NQ	NA
4410	Oil Production Glycol Regenerators					NQ	NA
4411	Oil Production Well Cellars					0.57	NA
4551	Marine Vessel Operations					NQ	NA
4552	Marine Vessel Loading					NQ	NA
4601	Coatings, Architectural					1.51	0
4607	Graphic Arts	09/17/97	9/14/00			0.84	0.84
4607	Small Printing Operations (Previous Rule #4611)	09/17/97	9/14/00			0.31	0.31
4608	Coatings, Plastic Parts					NQ	NA
4621	Gasoline Tanks & Dispensing	06/18/98	5/31/99			0.41	0.40
4622							
4623	Organic Liquid Storage					3.00	NA
4625	Wastewater Separators					0.05	NA
4626	Aircraft Fuel Storage & Refueling					0.03	NA
4627	Tank Cleaning & Venting					NQ	NA
4642	Landfill Gas Control	07/20/95	1998			1.41	0.28
4643	Water Treatment Plants (POTWs)					NQ	NA
4652	Coating & Ink Mfg					NQ	NA
4661	Organic Solvents*					NQ	NA
4662	Organic Solvent Degreasing					2.44	NA
4663	Organic Solvent Cleaning, Storage, and Disposal					0.19	NA
4692	Charbroiling, Commercial					0.39	NA
4701	Piston Engines, Stationary (Previous Rule # 4702)	12/19/96	5/31/01	12.44	22.3		
4903	Residential Space Heaters			0.14	0		
<b>Total Emission Reductions</b>				<b>23.08</b>	<b>25.68</b>	<b>11.15</b>	<b>1.83</b>

Note: NQ = Not Quantified and NA = Rule Not Adopted

\*Control measures planned for Rule 4661 are being developed for Rule 4663 (Organic Solvent Cleaning, Storage, and Disposal)

## **MOBILE SOURCE CONTROL MEASURES**

### **Introduction**

Under the CCAA's "severe" nonattainment classification, the District is required to include "reasonably available transportation control measures sufficient to substantially reduce the rate of increase in passenger vehicle trips and miles traveled per trip..." in its air quality attainment plans. As reported in the 1997 Triennial Update, a number of transportation control measures (TCMs) were included in the 1994 Triennial Update and OADP. Other TCMs that were not included in these plans, but which resulted in some emission reductions have also been developed. The status of these programs is described below.

Reductions from mobile source measures differ from stationary sources in that they are limited to a specific time period rather than being permanent, and they are calculated over the projects' lifetimes. Stationary source reductions are referenced on a tons per day basis because they are cumulative, in that they continue to occur day after day, year after year, from the same source. They continue to generate reductions as long as the controlled source is active. Due to the nature of mobile source projects, it is not possible to quantify the actual years in which the emission reductions will occur. For some projects, reductions may be limited or tied to a set number of years. For others, emission reductions may occur over an unspecified number of years.

### **District Committed TCMs**

The District is continuing to work with the Transportation Planning Agencies (TPAs) in their implementation of previously committed TCMs. The Memorandum of Understanding (MOU) between the District and the eight county TPAs is still in effect. Several anticipated mobile source measures identified in the OADP [Rule 9001 (Commute Based Trip Reduction), Rule 9010 (Fleet Inventory) and Rule 9011 (Light and Medium Duty Low Emission Fleet Vehicle)] are no longer being pursued. Rule 9001, the District's Commute Trip Reduction rule was successfully adopted and implemented but was rescinded in accordance with the prohibition of such rules by the state legislature. Rules 9010 and 9011 are no longer being considered for implementation because California adopted a low emission vehicle program that satisfied the federal requirement for these rules.

The 1999 status of each mobile source measure that was included in the 1994 Triennial Update is summarized below.

Reduce Motor Vehicle Emissions (REMOVE). The District continued to implement its REMOVE program. During the 1996-1998 (2 years were treated as one cycle) and 1998-1999 funding cycles, projects funded at a cost of almost \$4,900,000 resulted in an estimated 464 tons of emissions reduction over the lifetime of the projects.

Smoking Vehicle. During 1997, 1998 and 1999, the District received over 13,300 calls or report slips regarding smoking vehicles, with about a 27.5 percent response rate from individuals receiving a “Smoking Vehicle” letter.

In addition to the TCMs in the OADP, *1993 and Post 1996 Rate of Progress Plans*, and the 1994 Triennial Update, the District included the following TCM in the *PM-10 Attainment Demonstration Plan* (PM-10 ADP):

Current projections show a growth of 60% in light and medium duty vehicle activity between the 1993 base year and the 2005 attainment date. The PM-10 ADP assumes that the cities, counties, and transportation planning agencies can achieve a two percent reduction in cumulative growth in light and medium duty vehicle activity or equivalent by 2006.

District and TPA staffs are working on specific actions and programs to reduce vehicle miles traveled (VMT) or to reduce emissions through other activities. Currently, five of the eight TPAs in the Valley have allocated a total of \$3.5 million of their CMAQ funds to the District for use in air quality improvement programs.

### **Voluntary Mobile Source Programs**

The District continued to implement several other successful mobile source emission reduction programs between 1997 and 1999. These programs are described below.

A *Vehicle Buy-back Program* which removes older vehicles (1981 or older) from the Valley’s roads was implemented as a District-managed program during the 1995-1996 fiscal year. In the 1997-1998 cycle, the program reduced emissions by 850 tons at a cost of \$2,000,000. The District’s mobile source voluntary program emphasis then shifted from the *Vehicle Buy-back* to *Heavy Duty Vehicle Emission Reduction*.

The *Heavy Duty Vehicle Emission Reduction Program* provides financial incentives to municipalities, companies, fleet operators and individuals who purchase new heavy-duty, low-emission on-road vehicles from original equipment manufacturers (OEM); new OEM heavy-duty, low-emission engines for replacements; or retrofit technologies for heavy-duty on-road and non-road vehicles meeting criteria guidelines. The District estimates that approved projects funded during 1997-1999, using only Department of Motor Vehicle Surcharge Fee funds would result in an emissions reduction of 1,566 tons of NOx over the lifetime of the vehicles.

The District is also funding its *Heavy Duty Vehicle Emission Reduction Program* with Carl Moyer funds, provided through state legislative action. The District estimates that projects approved in 1999 using these funds will result in an additional 4,438 tons of NOx emissions reduction, again over the lifetime of the vehicles.

Additionally, in 1996, the District began a *Spare the Air Program*. This voluntary program is designed to encourage ridesharing and discourage use of equipment and

products that emit ozone precursors during the ozone season. The program is directed both to employers and the general public. In 1996, 75 employers were enrolled in the employer component. By September 1997, the employer component had increased to nearly 500 participants, while in 1998 and 1999, the employer component ran about 730. The focus of the program in 1999 was increasing the active participation of employers already enrolled in the program rather than increasing the number of employers in the program.

## **INDIRECT SOURCE PROGRAMS**

The AQAP contained three indirect source control measures: Enhanced District CEQA Participation, Air Quality Elements, and New and Modified Indirect Source Review. The first two programs are fully implemented, but the third has been changed substantially. The status of these programs is provided below.

In the Enhanced District CEQA Participation Program, the District reviews projects each year from nearly all local planning agencies in the San Joaquin Valley. Local jurisdictions routinely include air quality mitigation measures recommended by the District in development projects. District staff developed a *Guide for Assessing and Mitigating Air Quality Impacts* to further assist local jurisdictions in analyzing and mitigating impacts. The District's Governing Board approved it in 1998.

In the District's program to encourage air quality elements in city and county general plans, District staff provides assistance to cities and counties via its *Air Quality Guidelines for General Plans* (AQGGP) document and by reviewing general plans as they are updated. The AQGGP has been very well accepted. Nearly all cities and counties in the District that have prepared general plan updates have used the AQGGP since its approval in 1994.

The New and Modified Indirect Source Review program has been modified from a rule approach to a voluntary educational approach. After workshopping a draft rule, it was clear that a District program would be unacceptable to the local communities. Two cities, Stockton and Turlock, have adopted indirect source mitigation fee programs on their own. The District program has emphasized educating cities and counties on ways to develop land use patterns and site designs supportive of walking, bicycling, and transit. Several advisory documents on site design, street design, and livable communities have been developed with District resources.

## **PLAN REVISION**

### **INTRODUCTION**

The California Clean Air Act requires the District to establish a strategy that will achieve an annual average five percent reduction in ozone precursor emissions, or alternatively, to commit to taking all feasible measures to reduce emissions within its boundaries in an expeditious time frame. The District's adopted strategy is based on

the latter alternative. During the 2001-2003 period, the District anticipates continuing to implement its original control strategy of adopting rules to fulfill the District's SIP commitment and then to address additional measures needed for attainment of the California ozone standard. Based upon previous commitments, the evaluation of "achievable performance standards"<sup>3</sup>, and ARB's condition of approval of the District's 1997 Triennial Plan, the District has modified its rule development calendar.

During the 2001-2003 planning cycle, the District will continue its efforts to improve its emissions inventory. This will consist of both in-house efforts, joint efforts with ARB, and contracting with consultants for updating or developing inventories for specific sources.

### **CONTROL STRATEGY**

The District's rulemaking schedule in the 1997 Triennial Plan was grouped in three-year periods: 1998-2000, 2001-2003 and 2004-2006. The schedule for control measure development for the 1998-2000 cycle was developed by quarter and is shown on Table 3. The current status of the rules planned for development during this cycle, but not yet adopted, is shown on Table 6.

During ARB's review of the 1997 Triennial Plan, the District worked with ARB staff to determine which control measures should be further pursued by the District. It was determined that the District could proceed with the adoption of eight specific measures (see Table 6) by the end of 2000 and that it was feasible for the District to continue to pursue 18 additional measures in subsequent years. The ARB Governing Board then approved the District's 1997 Triennial Plan, subject to the District 1) adopting the eight rules shown on Table 6 by the end of 2000, 2) prioritizing the additional 18 measures shown on Table 7, and 3) adopting these measures at a rate of four per year during the 2001-2003 and 2004-2006 planning cycles. The District is undertaking an extensive review and analysis of the 18 control measures previously identified by ARB in its resolution. The analysis includes emission inventory development and improvement projects. Consultants were retained to develop methodologies and new inventories for seven of the 18 sources, while methodologies and inventories for several of the remaining categories and/or inventories are being developed or updated in-house. The review is expected to be completed by February 2001.

In addition to pursuing the attainment of the state ozone standard, the District also was required to attain the Federal 1-Hour National Ambient Air Quality Standard by November 15, 1999 or be bumped up to severe nonattainment for that standard. The San Joaquin Valley failed to reach attainment by the required date. Consequently, the EPA has proposed the reclassification of the Valley to severe nonattainment. Under the severe area classification, the Valley must reach attainment by November 15, 2005. EPA included in the bump-up notice a

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<sup>3</sup> *Identification of Achievable Performance Standards and Emerging Technologies for Stationary Sources: A Draft Resources Document* (ARB's Tier 1 list of Achievable Performance Standards).

requirement that the District amend rules as necessary to meet Reasonably Available Control Technology (RACT) for sources newly defined as major sources

**TABLE 6  
CURRENT STATUS 1997-2000  
STATIONARY SOURCE  
CONTROL MEASURE ADOPTION SCHEDULE AND RULEMAKING STATUS**

<b>Rule No.</b>	<b>Control Measure</b>	<b>1997 Triennial Plan Adoption</b>	<b>Anticipated Compliance Date</b>	<b>Status</b>
4103	Agricultural Waste Burning/Open Burning	4Q/2000	Post 2002	Second Workshop 11/2000 Final Workshop scheduled 3/2001 Adoption: 4/2001
4411	Oil Production Well Cellars	4/2000	4Q/2002	Second Workshop 1/2001 Final Workshop scheduled 3/2001 Adoption: 7/2001
4601	Architectural Coatings <sup>1</sup>	4Q/1999	4Q/2002	First Workshop scheduled 11/2000, Final Workshop scheduled 5/2001 Adoption 8/2001
4623	Organic Liquid Storage	4Q/2000	4Q/2002	Scoping Meeting: 3/2000 Workshops: 6/2000, 9/2000 and 2/2001 Adoption: 5/2001
4661	Organic Solvents	2Q/1999	2Q/2001	To be adopted as part of Rule 4663
4662	Organic Solvent Degreasing	2Q/1999	4Q/2001	Final Workshops scheduled 12/2000 Adoption: 2/2001
4663	Organic Solvent Cleaning, Storage, and Disposal	2Q/1999	2Q/2001	Second Workshops scheduled 12/2000 Final Workshop scheduled 2/2001 Adoption: 5/2001
4692	Commercial Charbroiling	2Q/2000	2Q/2002	Workshops scheduled 1/2001, 3/2001 and 6/2001 Adoption: 9/2001

<sup>1</sup>The adoption of the architectural coatings rule was delayed while waiting for the Statewide Control Measure for the source category to be developed by ARB.

**TABLE 7  
POST 2000  
STATIONARY SOURCE CONTROL MEASURES**

<b>RULE</b>	<b>CONTROL MEASURE</b>	<b>POTENTIAL ACTION</b>
4305	Very Small Boilers, Process Heaters, and Steam Generators	Amendment
4305	Dryers (as BARCT)	Amendment
4308	Asphalt Batch Plants & Hot Mix Asphalt Batch Plant Fugitives	New Rule
4403	Components Serving Gas Production Facilities	Amendment
4408	Oil Pipeline Pumping Fugitives	New Rule
4409	Discharge of Produced Oil/Flashing Losses	New Rule
4410	Gas Plant Glycol Regenerators	New Rule
4451	Valves, Pressure Relief Valves, Flanges, Threaded Connections and Process Drains at Petroleum Refineries and Chemical Plants	Amendment
4452	Pump and Compressor Seals at Light Crude oil and Gases Production Facilities & Components at Natural Gas Processing Facilities	Amendment
4602	Automotive Refinishing	Amendment
4609	Pleasure Craft Coating	New Rule
4627	Tank Cleaning and Venting	New Rule
4643	Water Treatment Plants (POTWs)	New Rule
4653	Adhesives	Amendment
4682	Polystyrene Foam Manufacturing	Amendment
4693	Bakery Ovens	New Rule
4701	Stationary and Portable Piston Engines	Amendment
4703	Stationary Gas Turbines	Amendment

because of the severe area classification. The RACT rules must be adopted within 18 months of the final reclassification date. EPA has also proposed or made limited approval/disapproval findings for several of the District's SIP rules. The District must also amend each rule to correct the deficiencies within 18 months of the date on which EPA takes final action on the rule.

The District's 2001-2003 rulemaking schedule is shown on Table 8. Because the San Joaquin Valley Air Basin is also nonattainment for particulate matter, 10 microns or less in diameter (PM10), the District also has rulemaking commitments for the control of PM10 source. These rulemaking projects are also reflected in the rulemaking schedule.

The District has taken both state and federal requirements into consideration in the development of the revised schedule. Although many of the rules must be completed on a timeline determined by federal actions, others have been prioritized based on a preliminary estimate of their emission reductions and cost effectiveness. During the first six months of 2001 the District will be developing its control strategy for attaining the federal one-hour ozone standard by 2005. As noted earlier, the District is evaluating many potential control measures for possible inclusion in the strategy. At the completion of this process, the District will prioritize the measures based on their potential to result in emission reductions, along with their cost effectiveness and complexity. The rulemaking schedule developed as a result of this process may result in some modification of the schedule shown on Table 8.

A rulemaking schedule for the next planning cycle, 2004-2006, is not addressed in this Triennial Report. When the District completes the control measure evaluation process that is being undertaken for the Severe Area OADP, it will be able to prioritize its rulemaking beyond the 2001-2003 planning cycle and the prioritization will be reflected in the OADP.

## **FURTHER STUDY MEASURES**

Further study measures are measures that need to be researched in order to determine their feasibility as control measures in the future. In the 1997 Triennial Update, the District's further study measures included:

- Electronics Manufacturing,
- Hot Mix Asphalt Batch Plant Fugitives,
- Natural Gas Pipeline Maintenance Operations (Open Venting)
- Oil Production Sumps,
- Oil Well Polish Rod Stuffing Box Fugitives,
- Oil Well Drilling and Workover Operations – Fugitive Emissions (ROG control),
- Well Vent Condensate and Solvent Used for Cleaning Oilfield Equipment,
- Wine Products Distillation, and
- Wineries.

**TABLE 8\***  
**2001-2003**  
**RULEMAKING SCHEDULE**

<b>RULE</b>	<b>CONTROL MEASURE</b>	<b>2000 TRIENNIAL PLAN SCHEDULE</b>	<b>ACTIVITY</b>	<b>COMMITMENT</b>
4103	Open Burning	2Q/01	Amendment	1997 Triennial Plan & EPA Requirement
4106	Prescribed Burning and Hazard Reduction Burning	2Q/01	New Rule	1997 Triennial Plan & EPA Requirement
4623	Organic Liquid Storage	2Q/01	Amendment	1997 Triennial Plan & EPA Requirement
4662	Organic Solvent Degreasing	2Q/01	Amendment	1997 Triennial Plan & EPA Requirement
4663	Organic Solvent Cleaning, Storage and Disposal	2Q/01	New Rule	1997 Triennial Plan & EPA requirement
Regulation 8	Fugitive Dust	2Q/01	Amendment	PM10 ADP & EPA SIP Deficiency
4411	Oil Production Well Cellars	3Q/01	New Rule	1997 Triennial Plan & EPA Requirement
4601	Architectural Coatings	3Q/01	Amendment	1997 Triennial Plan & EPA Requirement
4692	Commercial Charbroiling	3Q/01	New Rule	1997 Triennial Plan & EPA Requirement
4354	Glass Melting Furnaces	2Q/02	Amendment	EPA SIP Deficiency
4305**	Boilers, Process Heaters, and Steam Generators	3Q/02	Amendment	EPA SIP Deficiency
4307	Dryers & Ovens	3Q/02	New Rule	EPA RACT Requirement
4311	Flares	3Q/02	New Rule	EPA RACT Requirement
4312	Nitric Acid Plants	3Q/02	New Rule	EPA RACT Requirement
4313	Foundries	3Q/02	New Rule	EPA RACT Requirement
4351**	Boilers, Steam Generators and Process Heaters – Reasonably Available Control Technology	3Q/02	Amendment	EPA SIP Deficiency

<b>RULE</b>	<b>CONTROL MEASURE</b>	<b>2000 TRIENNIAL PLAN SCHEDULE</b>	<b>ACTIVITY</b>	<b>COMMITMENT</b>
4610	Mirror Coating Operations	3Q/02	New Rule	EPA RACT Requirement
4693	Bakeries	3Q/02	New Rule	EPA RACT Requirement
4696	Food Products Cooking	3Q/02	New Rule	EPA RACT Requirement
4104	Reduction of Animal Matter	3Q/02	Amendment	EPA RACT Requirement
4701**	Internal Combustion Engines	3Q/02	Amendment	EPA SIP Deficiency
4703**	Stationary Gas Turbines	3Q/02	Amendment	EPA SIP Deficiency
4403	Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities	3Q/03	Amendment	Feasible Control Measure
4451	Valves, Pressure Relief Valves, Flanges, Threaded Connections and Process Drains at Petroleum Refineries and Chemical Plants	3Q/03	New Rule	Feasible Control Measure
4452	Pump and Compressor Seals at Light Crude oil and Gases Production Facilities & Components at Natural Gas Processing Facilities	3Q/03	Amendment	Feasible Control Measure
4701	Internal Combustion Engines	3Q/03	Amendment	Feasible Control Measure
4703	Stationary Gas Turbines	3Q/03	Amendment	Feasible Control Measure

\*Projected emission reductions associated with the control measures are not included on this table. District staff is still in the process of developing this information. Projected emission reductions and a revised rulemaking schedule, if necessary, will be included in the Severe Area Ozone Attainment Demonstration Plan (Severe Area OADP). The Severe Area OADP will be adopted by the District's Governing Board and forwarded to ARB.

\*\*EPA has not finalized the limited approval/limited disapproval for Rules 4305, 4351, 4701 and 4703. District staff intends to pursue these amendments to satisfy a related commitment in the 1997 PM10 Attainment Demonstration Plan.

Activities associated with "Well Vent Condensate and Solvent Used for Cleaning Oilfield Equipment" will be subject to Rule 4663 (Organic Solvent Cleaning, Storage, and Disposal). Therefore, no further action will occur on this category. A feasibility determination still needs to be made on the remaining further study measures.

# **APPENDIX A PEAK INDICATOR FOR SITES IN SAN JOAQUIN VALLEY AIR BASIN**

**Appendix A Peak Indicator for Sites in San Joaquin Valley Air Basin**

County	Site	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999
Fresno	Clovis-N Villa Avenue						0.135	0.147	0.153	<b>0.155</b>	0.145	0.146	0.145	0.161	<b>0.159</b>
	Fresno-1st Street					0.149	<b>0.167</b>	<b>0.162</b>	<b>0.162</b>	0.15	0.152	0.153	0.152	0.155	0.146
	Fresno-Drummond Street	0.15	0.15	0.153	0.15	0.15	0.148	0.149	0.149	0.139	0.129	0.132	0.134	0.146	0.14
	Fresno-Sierra Skypark #2	<b>0.172</b>	0.151	0.149	0.138		0.134	0.133	0.136	0.134	0.138	0.138	0.137	0.144	0.14
	Parlier	0.164	<b>0.171</b>	0.168	0.16	0.158	0.152	0.149	0.153	0.147	0.147	0.153	0.147	0.149	0.148
	Shaver Lake - Perimeter Road											0.135	0.133	0.13	0.124
Kern	Arvin-Bear Mountain Blvd				0.165	<b>0.163</b>	0.165	0.16	0.153	0.144	0.147	0.146	0.144	0.145	0.137
	Bakersfield-5558 California Avenue									0.116	0.127	0.132	0.133	0.13	0.118
	Edison	0.161	0.165	<b>0.169</b>	0.167	0.161	0.153	0.151	0.153	0.154	<b>0.162</b>	<b>0.164</b>	<b>0.166</b>	<b>0.161</b>	0.152
	Oildale-3311 Manor Street	0.128	0.125	0.132	0.13	0.133	0.124	0.122	0.123	0.12	0.122	0.123	0.125	0.126	0.116
	Shafter-Walker Street				0.124	0.12	0.12	0.111	0.111	0.11	0.111	0.114	0.113	0.114	0.112
Kings	Hanford-S Irwin Street									0.11	0.105	0.136	0.137	0.137	0.123
Madera	Madera-Pump Yard													0.121	0.115
Merced	Merced-S Coffee Avenue							0.123	0.122	0.121	0.124	0.127	0.129	0.132	0.133
San Joaquin	Stockton-E Mariposa	0.136	0.134	0.133	0.133	0.132	0.119	0.117	0.117	0.116	0.119	0.116	0.11	0.106	0.11
	Stockton-Hazelton Street	0.126	0.125	0.122	0.117	0.12	0.114	0.112	0.11	0.111	0.115	0.114	0.107	0.108	0.112
	Tracy-24371 Patterson Pass Road										0.122	0.122	0.122	0.124	0.123
Stanislaus	Modesto-14th Street	0.133	0.133	0.131	0.13	0.126	0.122	0.117	0.119	0.119	0.127	0.128	0.127	0.127	0.126
	Turlock-S Minaret Street							0.114	0.118	0.114	0.123	0.126	0.131	0.132	0.13
Tulare	Sequoia & Kings Canyon Np														0.125
	Sequoia National Park-Lookout Point												0.122	0.121	0.121
	Sequoia Natl Park-Lower Kaweah		0.112	0.113	0.112	0.113	0.112	0.118	0.118	0.12	0.121	0.12	0.114	0.115	0.115
	Visalia-N Church Street	0.14	0.143	0.143	0.141	0.135	0.133	0.124	0.135	0.144	0.142	0.139	0.131	0.133	0.133
	Wilsonia-Grant Grove					0.12	0.116	0.118	0.121	0.12	0.119				
<b>Max peak indicator of all sites</b>		<b>0.172</b>	<b>0.171</b>	<b>0.169</b>	<b>0.167</b>	<b>0.163</b>	<b>0.167</b>	<b>0.162</b>	<b>0.162</b>	<b>0.155</b>	<b>0.162</b>	<b>0.164</b>	<b>0.166</b>	<b>0.161</b>	<b>0.159</b>

**APPENDIX B**

**COMMENTS RECEIVED**

**AND**

**RESPONSE TO COMMENTS**

**Comment 1:** Is the District's Air Quality Guidelines for General Plans (AQGGP) a mandatory document for city and county use? Can the use of the document be made mandatory?

Response: The use of the AQGGP is encouraged, but not required, by the District. State law currently mandates the required elements of a general plan and air quality is not one of the required elements. Should state law be amended in the future to require air quality elements in general plans, the action would likely include criteria for what it must include (as is done for other required elements). The District's AQGGP could be used to assist jurisdictions in meeting any criteria that might be developed as part of such a state action.

**Comment 2:** It appears that the 2000 Triennial Plan does not completely address the requirements of sections 39610(b) and 40912 of the California Health & Safety Code as they relate to air pollutant transport from the San Joaquin Valley into the Mojave Desert. Specifically, there is no discussion of the impact that previously adopted measures have had on ozone exceedances in the Mojave Desert, and there is no discussion on new additional transport mitigation measures to be implemented by the San Joaquin Valley Unified APCD in 2001 –2003 (and beyond).

Response: The Valley is a severe nonattainment area for the California ozone standard and must adopt measures directed toward achieving the standard. As provided for in the California Clean Air Act, the District has committed to taking all feasible measures to reduce emissions within its boundaries in an expeditious time frame. The measures adopted thus far have not been sufficient to achieve attainment of the standard in the San Joaquin Valley. The 2000 Triennial Plan Update, therefore, lays out an ambitious rule adoption schedule, which includes rules not previously on the rulemaking schedule. The 2000 Triennial Plan Update further notes that the District is in the process of preparing a severe area bump-up plan for the Federal one-hour ozone standard. This plan is expected to be due in the second quarter of 2002. As a result of this process, the rules proposed for 2003 may be modified and additional measures scheduled for years beyond 2003 will be added to the rulemaking schedule. All rules adopted by the District in future years directed at achieving both state and federal standards are mitigation measures for the transport of pollutants to the Mojave Desert.

**Comment 3:** The 2000 Triennial Plan Update references a PM10 Attainment Demonstration Plan transportation control measure (TCM) which assumes that cities, counties and transportation planning agencies can achieve a two percent reduction in cumulative growth in light and medium duty vehicle activity or equivalent by 2006. It also references the allocation by transportation planning agencies of \$3.5 million in Congestion Mitigation and Air Quality (CMAQ) funds to the District for use in air quality improvement funds. Do the reductions achieved by the \$3.5 million apply to the two percent equivalent commitment? Can a sentence be added to the discussion that states that the two percent reduction in vehicle activity has already been met?

Response: The TCM was referenced in the 2000 Triennial Plan Update because any reduction in emissions from mobile sources for PM10 also results in emission reductions for ozone precursors. The District is not taking any action that changes this commitment at the current time. Further clarifications may be forthcoming during updates to federal ozone and PM10 plans.

**Comment 4:** The rulemaking schedule includes rules that must be amended to correct deficiencies identified by EPA in limited approval/disapproval finding. Do the deficiencies include issues besides by Westside Federal Enforceability of certain rules and if other issues are involved that require modification to existing controls, will adequate time be allowed for affected industries to make the required changes.

Response: There may be other issues that need to be addressed besides the Westside Federal Enforceability issue. Each of the affected rules will have to be reviewed against EPA's findings to determine what changes will be needed. The Westside Federal Enforceability amendment would not require any additional controls. The correction of other deficiencies, however, might require additional controls. If this is the case, affected stakeholders would be allowed a reasonable time period during which the controls would have to be installed.