

San Joaquin Valley Air Pollution Control District

Approval of New Conservation Management Practices (CMPs)

Approved By: _____ SIGNED _____ Date Signed: 12/14/10
David Warner
Director of Permit Services

Purpose: To outline the procedures for the approval of new CMPs proposed by owners/operators to be used for compliance with the requirements of Rule 4550 Conservation Management Practices.

I. Applicability

This policy uses the Conservation Management Practice List (CMP List) approved by the District Board on May 20, 2004 as a baseline. The CMP List is posted on the District's website.

A practice not on the CMP list may be proposed by an owner or operator to be accepted as a CMP to comply with the requirements of Rule 4550.

The two sections of the rule that are applicable to proposed agricultural activities are:

- Section 6.2.3.1: An owner/operator may identify or develop a new CMP not on the CMP list to be used to comply with the requirements of this rule. Prior to use of the new CMP the owner/operator must obtain the interim approval of the APCO to use a new CMP to meet the requirements of Section 6.2. The owner/operator shall demonstrate that the new CMP achieves PM10 emission reductions that are at least equivalent to other CMPs on the CMP list that could be selected for the applicable operation.
- Section 6.2.3.2: The APCO will perform an independent analysis of proposed CMPs to determine that they achieve PM10 emission reductions that are at least equivalent to other CMPs on the CMP list that could be selected for the applicable operation. This analysis shall be made using the most recent emission factors provided by EPA or CARB when available. CMPs that are not shown to achieve equivalent emission reductions will be disapproved. The

District shall maintain a list of CMPs determined to be equivalent under this section.

II. Evaluation Process

The CMP Program incorporates the involvement of the District's Agricultural Technical Advisory (AgTech) committee. This AgTech committee will be part of the review team for the evaluation of practices/measures demonstrating capability to reduce particulate emissions for inclusion in the CMP List. Organizations participating in the AgTech committee includes the United States Department of Agriculture, Natural Resource Conservation Services, Resource Conservation District, California Department of Food and Agriculture, University of California, educational institutions, Agricultural Extension Services, agricultural associations, growers/stakeholders, District, EPA, ARB, and other governmental organizations. The other participant is the District Air Pollution Control Officer (APCO) who is responsible to make the final approval of the proposed practice.

Diagram 1 below presents a process for evaluating proposed agricultural practices. An owner/operator submits the proposed practice(s) and supporting documentation to the District who in turn will do an independent analysis before presenting the practice(s) to the AgTech committee. The AgTech committee will review and forward their recommendation to the APCO for approval or disapproval. If approved, the proposed practice will then be added as a new CMP to the CMP List.

The timeframe for each step is to be determined as the process becomes established.

III. CMP Approval Criteria

The reviewing contributors should use the following factors to consider when determining acceptability:

1. Equivalent emission reduction to existing CMP in comparable CMP Category.
2. Availability and quality of research or manufacturer's data sheet demonstrating the effectiveness of PM emissions reduction.
3. State or Federal new regulations affecting the CMP List (e.g.: ag. burn restriction).
4. Potential negative impacts of the practice on the environment or animal health.

The list of criteria is not all-inclusive. It is to be further refined by the AgTech Committee.

IV. CMP List Update

Practices suggested by an owner or operator will be reviewed through an established CMP evaluation process and added to the CMP List if accepted. The CMP list will be updated accordingly.

Diagram 1: Review Process for a Proposed Agricultural Practice to be accepted as a CMP

