

January 5, 2021

Elizabeth Adams, Director
Air Division
U.S. EPA, Region IX
75 Hawthorne St
San Francisco, CA 94105-3901

Re: Errata for Offset Equivalency Report, August 2019 – August 2020

Dear Ms. Adams:

Pursuant to Rule 2201 (*New and Modified Stationary Source Review NSR Rule*), the San Joaquin Valley Air Pollution Control District (District) completed its annual offset equivalency report for the twelve-month period from August 20, 2019, to August 19, 2020. The report was previously submitted to you on November 20, 2020.

District staff has identified and corrected a few minor errors in the Offset Equivalency Report, as described below. These errata, including the corrected and updated Offset Equivalency Report, are available on the District's website at the following address:

http://www.valleyair.org/busind/pto/annual_offset_report/2019Equivalency.pdf

Errata for Offset Quantity Previous Year-End Total Carry-Over Balance

The values from the "Excess or Shortfall previous Year" column from the 2018-19 Offset Equivalency Report was mistakenly used in the Offset Quantity Equivalency Summary and Table 8 of the 2019-20 Offset Equivalency Report, instead of the "Total Excess or Shortfall" values. The report has now been corrected to reflect the proper values from the 2018-19 Offset Equivalency Report.

Samir Sheikh

Executive Director/Air Pollution Control Officer

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4800 Enterprise Way
Modesto, CA 95356-8718
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- Original: Offset Quantity Equivalency Summary

San Joaquin Valley APCD

Annual Offset Equivalency Report

Offset Quantity Equivalency

Summary for 08/20/2019 through 08/19/2020

Pollutant	Number of New Major Sources	Number of Federal Major Mods	Offsets Required under Federal NSR	Offsets Required under District NSR	Current Year Excess or Shortfall	Previous Year-End Total Carry-over Excess or Shortfall	Year-to-Year Adjustment to Carry-over Balance	Year-End Total Carry-over Excess or Shortfall
NOx	0	7	18.8	26.8	8.0	4,319.9	(3,968.8)	359.1
VOC	0	12	50.0	35.0	(15.0)	733.4	(2,820.6)	(2,102.2)
PM10	0	0	0.0	15.1	15.1	837.5	(529.7)	322.9
PM2.5	0	0	0.0	0.0	0.0	377.7	(185.4)	192.3
CO	0	0	0.0	0.0	0.0	198.1	0.0	198.1
SOx	0	0	0.0	8.5	8.5	2,863.6	(1,696.1)	1,176.0

Notes:

- All values are in tons per year

- Corrected: Offset Quantity Equivalency Summary

San Joaquin Valley APCD

DRAFT Annual Offset Equivalency Report

Offset Quantity Equivalency

Summary for 08/20/2019 through 08/19/2020

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NOx	0	7	18.8	26.8	8.0	4,313.9	(3,968.8)	353.1
VOC	0	12	50.0	35.0	(15.0)	707.2	(2,820.6)	(2,128.4)
PM10	0	0	0.0	15.1	15.1	840.7	(529.7)	326.1
PM2.5	0	0	0.0	0.0	0.0	377.7	(185.4)	192.3
CO	0	0	0.0	0.0	0.0	198.1	0.0	198.1
SOx	0	0	0.0	8.5	8.5	2,911.1	(1,696.1)	1,223.5

Notes:

- All values are in tons per year

- Original: Table 8 – Offset Quantity Equivalency Demonstration (tpy)


Pollutant	Number of New Major Sources	Number of Federal Major Mods	Offsets Required under Federal NSR	Offsets Required under District NSR	Current Year Excess or Shortfall	Previous Year-End Total Carry-over Excess or Shortfall	Year-to-Year Adjustment to Carry-over Balance	Year-End Total Carry-over Excess or Shortfall
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SOx	0	0	0.0	8.5	8.5	2,911.1	(1,696.1)	1,223.5

The District looks forward to working with your staff to navigate the impacts of the 2019-2020 equivalency demonstration, and to assist in developing solutions related to the District’s offset equivalency system, as needed to maintain an effective permitting system that allows for protection of public health and strong economic growth in the Valley. Please call me at (559) 230-5900 or email me at arnaud.marjollet@valleyair.org if you have any questions regarding this matter, or if you need additional details.

Sincerely,


Arnaud Marjollet
Director of Permit Services

cc: Courtney Graham, CARB

Attachment: Revised Annual Offset Equivalency Report