
SOUTH CENTRAL COAST BASINWIDE AIR POLLUTION CONTROL COUNCIL

Santa Barbara County APCD
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TECHNICAL ADVISORY COMMITTEE

Michael Villégas, APCO
Ventura County APCD

Terence E. Dressler, APCO
Santa Barbara County APCD

Larry R. Allen, APCO
San Luis Obispo County APCD

COUNCIL MEMBERS

Brian Brennan
Council Member, City of Ventura

Roger Aceves, Vice Chair
Council Member, City of Goleta

Karen Bright, Chair
Council Member, City of Grover Beach

MEETING MINUTES March 16, 2011

Present

Council Members: Brian Brennan, Ventura County
Roger Aceves, Santa Barbara County
Karen Bright, San Luis Obispo County

Staff: Mike Villegas, Ventura County
Terry Dressler, Santa Barbara County
Larry Allen, San Luis Obispo County

Public: Steve Zacks, Hanson Aggregate

1. Approval of Minutes of October 20, 2010

Bright/Brennan Minutes Approved

2. Election of Chair and Vice-Chair

Chair: Karen Bright
Vice Chair: Roger Aceves

3. Boiler MACT implication to District programs - Dressler

MACT, which stands for Maximum Achievable Control Technology, is a method of analysis applied to toxic air contaminants. In order to get the maximum achievable control over the toxic air contaminants, Federal regulation does not take cost into consideration during its analysis of MACT, making it one of the toughest air pollution standards.

On February 21, 2011 the EPA finalized their rule to reduce toxic emissions from new and existing industrial institutional boilers and process heaters at major sources. Major sources in Santa Barbara and San Luis Obispo counties are those which have the potential to emit over 100 tons of pollutant, or any single toxic pollutant over 10 tons. In Ventura County, the major

source threshold is over 25 tons. This new rule will affect 15 sources in Santa Barbara County, 8 in San Luis Obispo County and 26 in Ventura County.

This new rule addresses 15 sub-categories, each with their own requirements. For new and existing natural gas-fired or refinery gas-fired boilers, there are no numeric control requirements or numeric emission limits. Workplace standards will be required, which is to keep records and perform annual tune-ups of the boilers to ensure they are operating effectively. The effect on major sources will be minimal.

For major sources using non-gas-fired boilers such as coal or oil, there are specific emission limits for mercury, dioxins, particulate matter, hydrogen chloride, and carbon monoxide. The rule requires continuous monitoring to ensure compliance. All units larger than 10 million BTU/hr are required to utilize an oxygen monitor.

Area sources, those sources emitting less pollutants than the thresholds set for major sources, will also be subject to this new rule, but only for non-gas-fired boilers.

As a Federal regulation, rules will be applied the same way to all districts. Engineering Managers from each district will be working together to ensure implantation is done the same.

4. Update on PERP issues - Villegas

The Portable Equipment Registration Program (PERP) is a statewide program administrated by the California Air Resources Board (ARB) and enforced by local air districts.

There have been many implantation issues over the years. In February, an issue arose in Mendocino County regarding two-engine units, a guardrail post digger and a concrete grinder. ARB staff claimed these units were subject to the off-road Air Toxic Control Measure (ATCM) and therefore did not need a PERP or permit. However, after discussion with the Engineering Managers, it was decided either registration or a permit was needed for the second engine.

The more significant issue is the use of portable equipment at stationary sources. Portable equipment use has become an enforcement issue, and engines must be evaluated on a case by case basis. Portable equipment is such that it comes into a stationary source, performs work, then leaves. When a portable engine becomes an integral part of a stationary source however; this is when it should be subject to permit and reviewed pursuant to New Source Review. Included in the permit process is a Health Risk Assessment analysis to ensure the emissions will not affect nearby residences. Portable equipment under the PERP is exempt from this requirement.

5. PM Reduction efforts at the Oceano Dunes - Allen

San Luis Obispo APCD has been working since August 2010 under a Memorandum of Agreement (MOA) with the State Parks and the County of San Luis Obispo to reduce particle matter (PM) at the Oceano Dunes. High levels of PM_{2.5} and PM₁₀ have been measured in Nipomo Mesa due to the high winds at the Oceano Dunes. After 6 years of study, it was found that off-road vehicle use at the dunes was the main cause of the high PM because they are destroying the natural crust that helps minimize PM.

The APCD was directed by their Board to start working on solutions and develop a long range plan. Under the MOA with the state and county, committees have been formed and scientists have been

hired to conduct research. \$100,000 in funding by the state and county has been allocated. With this research, pilot projects have been created and will be implemented in the next couple weeks when the windy season kicks in. Three different control strategies will be evaluated for their effectiveness in reducing PM emissions; measurements of wind and sand movement will be taken both upwind and downwind from each project:

- Re-vegetation
- Artificial roughness, such as hay bales to break up the wind pattern
- Series of measurements to compare side-by-side areas of those which allow off-road riding, to those which do not allow off-road riding

The 24-hour State Standard for PM₁₀ of 50 micrograms per cubic meter is often violated on the Nipomo Mesa area. PM levels are often relatively low during morning and evening hours, but when winds are high during the afternoon, the resulting high PM for those few hours can push the 24-hour average beyond the threshold. An advisory program is being created so that when hourly concentrations of PM are forecasted to exceed 300 micrograms per cubic meter, advisories will be issued to the public.

6. EPA's recent proposal regarding reasonable further progress – Villegas

Part of the planning process when a district is non-attainment is to create an inventory of all sources of air pollution, which is used as an input in a computer model. The computer model will help forecast future emission levels and provide a Carrying Capacity. A Carrying Capacity is the amount of pollution an area can have and still meet attainment standards. The computer model also becomes part of an attainment demonstration to show how performing different actions will help the district meet attainment by a specific date.

The other part of the planning process is Reasonable Further Progress, which requires a 3% reduction in emissions per year. Pollution can be transported from air basin to air basin. In the past, EPA has allowed districts to count emission reductions from adjacent areas due to their transported pollution. These reductions that occur outside the district help districts to attain the health standards, and can be used as part of a reasonable further progress demonstration. Due to recent events, the EPA is now trying to remove the ability to take credit for emission reductions from transported pollution. The rule has not yet been finalized, but is being closely followed by ARB and CAPCOA.

7. Prop 26 and air district fees - All

As budgets are evaluated for the upcoming fiscal year, fee increases are being considered. It does not appear however that any increase will be affected by Prop 26. Santa Barbara county has an automatic CPI adjustment each year. San Luis Obispo and Ventura counties are considering a small percentage increase in fees, though the amount has not yet been determined.

8. Other Business/Next Meeting Date

A request was made that APCO's speak to their Board members about any actions being taken within their district due to the radiation concerns of the unstable nuclear reactors in Japan.

Next meeting date – June 15, 2011