



**ARB Workshop – Fresno
Meeting PM2.5 Standards in the San Joaquin Valley
December 1, 2016**

The District and ARB are in the process of conducting public outreach in the course of developing an integrated attainment plan that addresses the Clean Air Act mandates for multiple PM2.5 standards. This process will include public workshops, Public Advisory Workgroup (PAW) meetings, and other venues to solicit public input and share agencies' strategies and supporting documentation. The following are the District's initial questions and issues with respect to the information presented by ARB at the December 1, 2016 workshop:

1. Attainment extensions or classification bump-up are always seen by the District as the last resort. With respect to the 2021 Moderate attainment deadline for the 2012 standard, is it ARB's position that attainment by 2021 is not possible?
2. With respect to the 2025 Serious area attainment deadline for the 2012 standard, given the legal requirement for 3 years of clean data, the District believes that the reductions must be in place in 2023. Is ARB's position different, and is the proposed "attainment strategy" designed to achieve the emissions reductions by 2023?
3. ARB is proposing an integrated "attainment strategy" for multiple PM2.5 standards (slide #6). How does the proposed "attainment strategy" address the attainment deadlines for multiple PM2.5 standards. Specifically, the attainment deadline for the 2006 PM2.5 standard is 2019. ARB's proposed "attainment strategy" ignores the 2019 attainment deadline for the 2006 standard. Does ARB believe that attainment by 2019 is impossible? If so, is ARB recommending that the District seek a 5-year extension until 2024?
4. As we work to develop an integrated plan to address multiple PM2.5 standards, EPA has disapproved contingency reductions provided by the Air Resources Board for the District's plan for the 1997 PM2.5 standard ("Withdrawal of Approval and Disapproval of Air Quality Implementation Plans; California; San Joaquin Valley; Contingency Measures for the 1997 PM2.5 Standards" – May 2016). Does ARB propose to address this deficiency in contingencies provided by ARB measures in the proposed "attainment strategy"?
5. Does ARB's proposed "attainment strategy" contain adequate reductions for contingency purposes? Please provide details.
6. ARB's attainment modeling projects concentrations at design value monitoring stations. The District does not believe that reductions in directly

emitted PM_{2.5} emissions from different source categories provide equal benefit in reducing PM_{2.5} concentrations at the Valley's design value monitoring stations. Source-specific characteristics such as location, current control programs that include episodic curtailment based on meteorological conditions, seasonality, and temporal patterns must be properly accounted for in the modeling. How does ARB's modeling accomplish this? Please provide details for proposed source category controls and reductions.

7. Currently there are only 1,635 clean wood burning units registered that under the current rule are allowed to burn when the concentrations are below 65 ug/m³. The impact from these units is local and only 86 are located in Kern County, the units closest in proximity to the Valley's design value stations. Emissions associated with these units on permissible burn days is negligible. What does ARB mean by suggesting "More stringent limits for wood burning curtailment" (slide #58)? Is ARB suggesting an outright ban on residential wood burning in the San Joaquin Valley?
8. ARB's proposed "attainment strategy" includes percentage emissions reductions from various source categories. Has ARB done an analysis to quantify that the proposed percentage reductions are achievable by the attainment deadlines? Please provide details.
9. Agricultural open burning emissions in the San Joaquin Valley have been reduced by 80% through the District's regulations. Given the decline of the biomass industry that has served as a cleaner alternative for the open burning of agricultural waste, the District may be forced to relax prohibitions on agricultural burning where no feasible alternatives are available. What measures does ARB envision for maintaining the reductions already made, or achieving further reductions from agricultural open burning?
10. How much reduction does ARB estimate from under-fired charbroilers?
11. The District through the public outreach process intends to develop a list of mobile source control measures for ARB's consideration for incorporation into the District's attainment strategy in the State Implementation Plan. What specific new strategies is ARB currently contemplating for reducing mobile source emissions? Please provide estimated reductions and the timing of those reductions.
12. The District will provide additional funding commitments to reduce stationary, mobile, and indirect source emissions. What potential funding sources for reducing mobile source emissions are available from ARB/State for added reductions beyond the current control programs to help with the "attainment strategy"? Please provide an estimate of funding, and estimated quantity and timing of reductions.