

Control of Emissions for Regulated Sources

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AB 617

Community-Focused Emission Reductions

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AB 617 Community Emission Reduction Program (CERP): Opportunities to identify and implement community-focused emissions reductions

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Steering Committee's local knowledge and feedback is vital

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Importance of understanding existing efforts to control emissions

Sources of Emissions

Who has Primary Authority Over the Different Sources of Emissions?



San Joaquin Valley
Air Pollution Control
District (District)



California Air Resources
Board (CARB)

Wood burning fireplaces, gas stations, auto body shops, agricultural operations, stationary internal combustion engines, oil/gas activities, and other industrial sources

Cars, Trucks, and Other
Mobile Equipment

Consumer Products

Decades of Stringent Air Quality Regulations

District has a long history of stringent rules for stationary sources in efforts to attain federal and state air quality standards.

- Adopted over 650 rules and rule amendments in order to control emissions from stationary sources and other local sources

District stationary sources are subject to numerous rules, and permits are used to enforce those rules, since the 1980s.

Robust and ongoing analysis is necessary to demonstrate that District's rules continue to meet state and federal requirements, including Best Available Retrofit Control Technology (BARCT).

- Increasingly stringent air quality standards
- Control technologies continually evolving

District Rules Applicable to Sources in Arvin/Lamont Area

Commercial and Industrial Sources

- Rules 4621/4622 (Gas Stations)
- Rule 4612 (Auto Coating)
- Rule 4702 (IC Engines)
- Rule 4672 (Dry Cleaners)
- Rules 4306/4320 (Boilers/Heaters)
- Rule 4565/4566 (Composting)
- Rules 4694 (Wineries)
- Rule 4695 (Brandy Warehouses)

Oil Production and Refining Operations

- Rules 4306/4320 (Boilers/Heaters)
- Rule 4311 (Flares)
- Rule 4401 (Wells)
- Rule 4409 (Light Oil/Gas Production)
- Rule 4455 (Refinery Fugitives)
- Rule 4460 (Refinery Monitoring)
- Rule 4623 (Oil Storage Tanks)
- Rule 4624 (Organic Liquid Loading)

District Rules Applicable to Sources in Arvin/Lamont Area (Cont'd)

Agricultural Sources

- Rule 4103 (Open Burning)
- Rule 4450 (Conservation Management Practices)
- Rule 4570 (Confined Animals)
- Rule 4702 (IC Engines)

Other Sources

- Rule 4901 (Wood Burning Fireplaces)
- Rule 4902 (Water Heaters)
- Rule 4905 (Furnaces)
- Rule 9510 (Indirect Source Review)

Fugitive Dust Sources

- Rules 8011 – 8081, cover various sources of fugitive dust
 - Construction/excavation/earthmoving
 - Bulk material storage/handling
 - Carry and track out
 - Open areas
 - Paved and unpaved roads
 - Off-field agricultural sources
 - Unpaved vehicle/equipment traffic areas

District Permits

District requires permits for stationary sources of air pollution

- Enforceable conditions ensure compliance with air quality regulations

Step 1. Authority to Construct: Pre-installation Approval

- District determines if equipment meets all requirements, including Best Available Control Technology (BACT) to minimize air emissions and associated health risks
- Some projects will require multilingual public notification

Step 2. Permit to Operate: Ongoing Requirements

- After equipment is installed, District compliance staff conducts a site inspection
- Periodic District site inspections, emissions testing, recordkeeping

Other District Approvals

- District Registrations and other approvals
 - Clean Wood Burning Heaters
 - Permit-Exempt Equipment Registrations
 - Portable Equipment Registrations
 - Conservation Management Practices Plans
 - Dust Control Plans
 - E-Trip (Employer-based Trip Reduction)
 - Indirect Source Review
- Provide facilities with specific requirements to minimize emissions
- Periodic District inspections

How Do We Enforce These District Requirements?

Enforcement Program

- Enforcement is a critical element of improving air quality & meeting federal health-based air quality standards
- Air District Enforcement seeks to ensure businesses, individuals and municipalities comply with local, state, and federal regulations
- Each year, District performs inspections at over 9,000 permitted facilities and responds to approximately 3,000 public complaints Valley wide

Inspections of Permitted Sources

- Unannounced compliance inspections are conducted to enforce air quality regulations
- Inspections are done on location, and includes observing the process/equipment in operation, and record review
- Inspectors utilize a variety of advanced detection and monitoring equipment to verify compliance with permitted emission limits

Inspections of Permitted Sources



Inspections of Permitted Sources

- In addition to routine inspections, District staff visit and inspect sources for a variety of reasons, including:
 - Complaint response
 - New equipment installations
 - Equipment malfunctions (Breakdowns)
 - Observing required third-party emissions testing

Inspections of Permitted Sources



Responding to Public Complaints

- The District's Compliance Department responds to public complaints, which are given the highest priority for field staff
- Complaints can be filed by telephone, online, or ValleyAir mobile app
- Inspectors are on-call 24 hours a day, 365 days a year
- A bilingual telephone complaint line is available, and staff utilizes a multilingual translation service as needed to respond to caller
- Inspectors communicate results of the investigation with the caller

Open Burning Regulations

- The open burning of residential waste (trash/yard waste) is illegal
 - District promptly responds to complaints of illegal burning and works closely with local fire agencies to encourage cross-reporting of incidents
- Agricultural burning is regulated and conducted under permit
 - Although agricultural burning is phasing out, it is still allowed for a few crop types where there are no feasible alternatives available
 - Alternatives to Agricultural Open Burning Incentive Program
 - Smoke Management System to determine when, where, and how much burning may occur; to protect public health; and prevent significant deterioration in air quality, or a violation of ambient air quality standards

Examples of Ag Burning Inspections



Wood Burning Fireplaces and Heaters

- Substantial resources dedicated to the enforcement of Wood Burning Fireplaces/Heaters Rule 4901 (from Nov. thru Feb.)
- On each mandatory curtailment day, District inspectors conduct surveillance
 - Focus on high non-compliance areas and where public complaints regarding burning are common
 - Additional surveillance and complaint response conducted on weekends, holidays, and during nighttime hours
- Third party certification for devices under Burn Cleaner Program

Examples of Residential Wood Burning Inspections



Fugitive Dust

- District rules limits fugitive dust emissions from many activities (construction, demolition, etc.)
- Construction Notifications or Dust Control Plans (DCPs) are required for majority of construction activities
 - DCPs are reviewed and approved prior to the start of project to ensure that operators will utilize required work practices to mitigate dust emissions
 - District staff inspects projects and responds to complaints regarding fugitive dust

Fugitive Dust Examples



Violations and Penalties

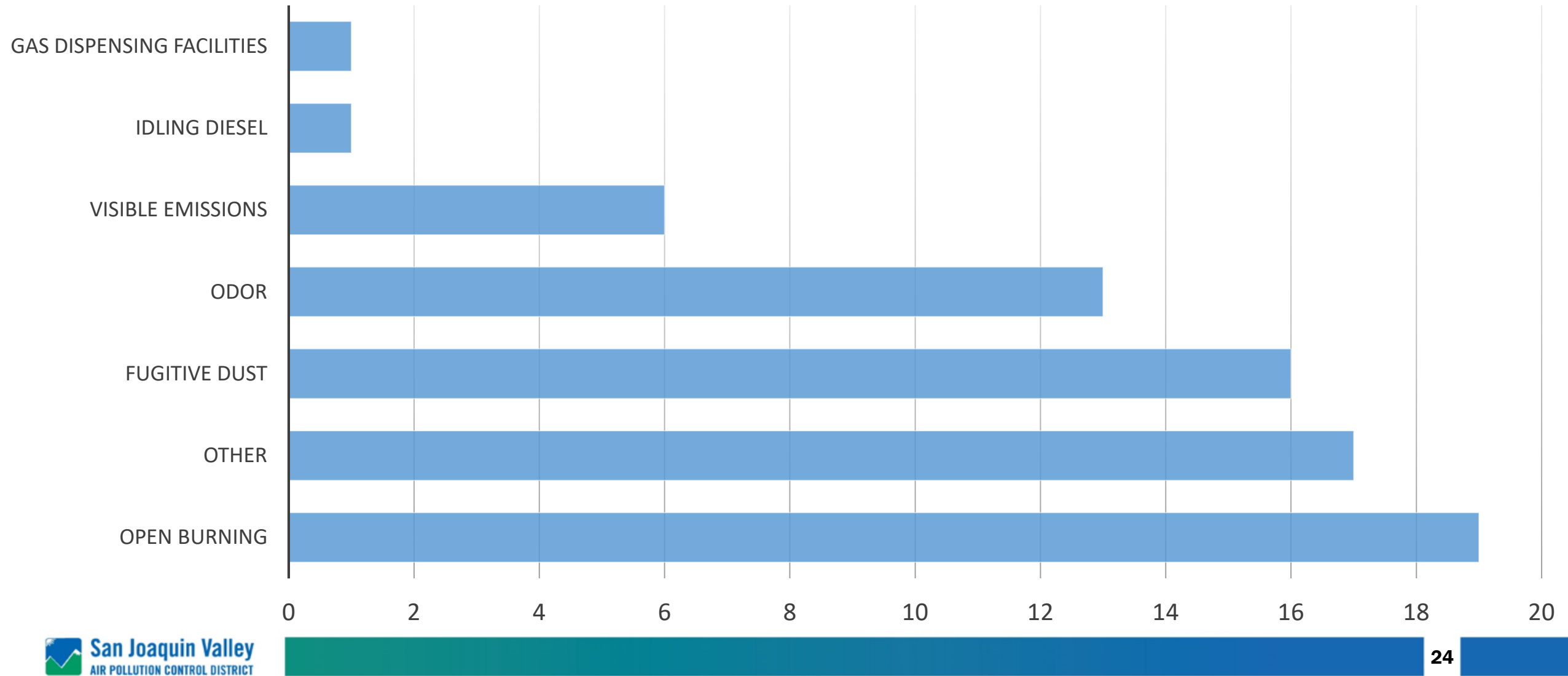
- Enforcement action is taken when a violation is discovered
 - Notices to Comply: limited to first-time minor violations that are administrative in nature
 - Notices of Violation: all other violations
 - When enforcement action taken, District staff work closely with people to come into compliance and to avoid future violations
- Per state requirements, the District's Mutual Settlement program seeks resolution
 - Provides the alleged violator an opportunity to discuss the matter
 - Most cases lead to a mutual settlement out of court
 - Court may be needed when mutual settlement cannot be reached

Enforcement Activities in the Arvin-Lamont Community

- From October 2018 through October 2021, the District:
 - Conducted 410 inspections and investigations of permitted facilities
 - Received and responded to 73 air quality complaints from the public
 - Issued 141 enforcement actions associated with violations of air pollution rules and regulations

Number of Complaints by Type

(October 2018 through October 2021)



Enforcement Actions by Type

(October 2018 through October 2021)

