

Comments on South Central Fresno Draft Emission Reduction Plan

Submitted by Mukasa Kezala

Thank for the opportunity to review and comment on the Draft South Central Fresno Community Emission Reduction Plan (CERP). In reviewing the CERP, the main interest was to verify that the proposed strategies go towards lowering some of the CalEnviroScreen Scores upon which the community was selected - poverty, unemployment and air pollution burden, etc. Comments follow:

1. Separate AB 617 from Carl Moyer and Prop 1B programs, to make it possible, down the line, to measure its achievements.

AB 617, adopted in 2017, is a unique program intended to reduce air pollution in selected communities. In order to measure its success, emission reductions attributable to AB 617 should be handled separate from those due to other incentive-based strategies, such as Carl Moyer, which has been around since 1998, and Prop 1B - Movement of Goods, adopted in 2006. Those two programs, Moyer and Prop 1B, are valleywide, and certain incentive-based emission reductions funded through those programs appear to have been hard-wired into the EPA-approved valleywide PM 2.5 Attainment Plan. They are a given.

The AB 617 community represents a very small fraction of the Central Valley, although it does not exist in a bubble - is not isolated. Some of the mission reductions in the community will contribute towards attainment of health-based air quality standards. The converse is also true. That said, for future accounting purposes on the success of AB 617 in South Central Fresno, valleywide emission reductions already credited or attributable to the PM 2.5 Plan should be identifiable and excluded, as they would have been realized through the PM 2.5 Plan. The Carl Moyer and Prop 1B programs should not be commingled with AB 617. AB 617 should stand on its own in order to be able to measure its achievements.

Along the lines of staying focused on what I believe was the original need for and intent of AB 617; to reduce emissions at the community level, following are some air emission categories, sources or activities within the AB 617 community, for the District to consider as candidates for emission reduction strategies:

- Crematoriums: District complaint records will confirm that they smoke. Their smoke emissions (toxics and PM) should be controlled, just like those from under-fired charbroilers. Grant funds can be used for installation of monitors and data loggers for key operating parameters; to allow the District to verify routine compliance. Perhaps, consider funding larger after-burners.
- Electric motor shops - toxic and PM emissions due to incomplete combustion wire insulation should be controlled. Require the same controls and self-inspections and recordkeeping as that for crematoriums.

- Compliance verification - CARB should do unannounced source tests for emission units not monitored by CEMs, such as baghouses. This will provide more representative emissions data for better inventories and exposure levels (as opposed to staged source tests)
- Vitro Flat Glass - consider the inquiry or suggestion made by a Hearing Board member, along the lines of **gradually** shifting planned maintenance from winter to spring or summer months, so as not to discharge about 2,000 LB of excess PM and about 3,000 LB of excess SOx emissions during the inversion layer period. It doesn't hurt to ask if that is an option.

The above are just examples of the many potential opportunities to reduce air emissions at the community level and/or to obtain or use emissions data representative of actual operations.

2. Require verifiable and enforceable inspection and maintenance program (I&M) for facilities found in violation, with recurrent air pollution related problem or creating a nuisance, and/or where appropriate. This will be along the lines of the District's Inspect Program, but required for good cause. Alternatively, impose monetary penalties, up to the amounts authorized under AB 617, to serve as a deterrent, with the fines collected going towards supplemental environmental projects within the AB 617 community.
3. Projects listed in the CERP as funded in the AB 617 community should be limited to only those funded from 2016 to present. It appears the list includes all projects funded in the past 10 years. Starting from 2016 is closer to the adoption date of AB 617 in 2017, and that makes it consistent with records in the Enforcement Section of the CERP - Appendix F, where a Summary of Complaints and inspections conducted, are listed starting in 2016. Projects funded up to 10 years ago may predate the CalEnviroScreen Scores used in selecting the community and may skew the information in CERP.
4. For grant-funded projects in South Central Fresno listed in Table 3-3, include the actual street addresses or UTM coordinates of each project location, for the CERP reader to understand where the emission reductions occurred and how they impact the AB 617 community. Provide the same level of detail as that for facilities listed in Appendix F. For the listed projects, state the one criteria used for listing them as part of the AB 617 community or City of Fresno, for example, distance from the community boundary or other reference point. Also, indicate the funding period - between when and when. Table 3-3 heading just says "...as of August 1, 2019".
5. Section 3-3 of the CERP, under Existing Air Quality Programs, Regulatory Measures, states, among other things, that:

“ Many current rules are fourth or fifth generation, meaning that they have been revised and emissions limits have been lowered several times, as new emission control technology has become available and cost effective.

*Building on decades of developing and implementing active and effective air pollution control strategies, District rules implement **the most stringent measures, best available control measures, and best available retrofit control technologies feasible to require in the San Joaquin Valley.**” (Emphasis added)*

Table le 3-2: District Rules Reducing South Central Fresno Air Pollution, lists a 1992 Rule 4201; *Particulate Matter Concentration*, among those rules. At industrial facilities, the rule applies to particulate matter scrubbers, baghouses (dust collectors), etc. For the purpose of this comment, scrubbers are not an issue. If permitted emission limits for large baghouses in the AB 617 community are based on Rule 4201, and the baghouses are allowed to operate with visible emissions up to 5% opacity, per APCD policy, we believe, emissions from those baghouses can be reduced. This is why:

Rule 4201 has not been revised since the creation of the APCD in 1992. It is not as stringent for PM control as South Coast AQMD Rule 1155 that has a particulate matter concentration limit for large baghouses of 0.01 grains/scf versus APCD Rule 4201 limit of 0.1 grains/scf, in the exhaust gases. That means, for a similarly-sized baghouse or dust collector, Rule 4201 allows 10 times as much pollution as a baghouse in the Los Angeles area. Also, the SCAQMD rule does not allow any visible emissions from a baghouse while APCD policy allows up to 5% opacity. Therefore, there is room for improvement.

To achieve the same PM emission control as that in the SCAQMD region, all that is required is to gradually install or retrofit the affected baghouses with better filter fabric. The baghouse proper would not be replaced, just replacement or retrofing the inside with better quality filtering fabric (just like changing the quality of bags for home vacuum cleaner, without buying a new vacuum cleaner).

Therefore, the District should determine the number of baghouses in the AB 617 community that meet the applicability criteria for the 0.01 gr/scf in SCAQMD Rule 1155, and consider revising Rule 4201 and/or not allowing the 5% opacity - visible dust in the baghouse vent stack (5% opacity can easily be mis-read up to 20%. But, “*no visible emissions*” - 0% is unmistakable).

6. Summary of Complaints in Appendix F: The font used for the 10 pages or so for those records is very small - not readable. Brought to the District’s attention in an Aug. 27, Request for Public Records seeking records in a format the font can be enlarged and/or the records sorted.

Would have liked to review and comment on the complaint records to determine whether there were potential candidates for the suggested inspection and maintenance program, under Comment # 2, above.

7. Funding for ride-share electric vehicles, carpools, Dial-A-Ride etc. The proposed funding of \$250,000 is a step in the right direction. Raising the funding to \$1 million or more would be justifiable in that, I believe, there is a great need for such transportation. And, that would be along the lines of reducing poverty in the AB 617 community, a CalEnviroScreen Score upon which the community was selected.

Lack of transportation can be a hindrance to economic opportunities. Some brave souls have to walk or ride bicycles, fighting off dogs, to go to jobs that start at 5:00 AM, because buses do not start running that early. Some are not able to go to evening classes to learn new skills because they can't make bus connections to get back home safely, after night-school. It may be difficult to understand why a person cannot afford to own a car until you understand their situation. Alternatively, one can try balance a family budget, assuming an income of minimum wage or even \$15 per hour, and with no benefits - medical, vacation, etc. That is poverty.

It is hoped that the District will work with the City of Fresno to come up reasonable public transportation options, to help some of the economically challenged folks to get to and from work and/or school, to improve their situations or to just get by. Millions of dollars are coming into the Valley on account of AB 617. From that, some entities will get subsidized farm tractors or big rig truck engines, electric or hybrid vehicles, etc. Unfortunately, most residents in the AB 617 communities, at least the ones I know, don't have money needed to participate in grant-funded incentive programs. And, for the improved air quality due to those incentive programs, and in particular the way the Draft CERP is crafted, all of us will benefit, regardless of where we live. So, what is in it for the AB 617 community residents?

Years from now, we want people to feel that AB 617 came to their community and made their lives better. Out of the millions of dollars coming into the valley, \$1 million spent on improved transportation to make transportation easier, is justifiable.

8. Proposed extra *Tune In Tune Up* event in the AB 617 community: Unless this is by invitation only or motor vehicle registrations will be checked for addresses, the event will be attended by residents from throughout the Central Valley. It will be just like all the others - not really "extra".
9. Weatherization, solar power, etc. -[**Placeholder** - will make comments after looking into info learned at the Aug 28 Public Workshop, regarding available funding opportunities].