

3) State regulations

The California Air Resources Board (ARB) adopted a diesel risk reduction plan and is in the process of promulgating a series of Air Toxics Control Measures (ATCMS) that will affect diesel engines. Specific information regarding these the diesel risk reduction plan can be found at <http://www.arb.ca.gov/diesel/dieselM.htm>. Several of the ATCMS that will have a direct impact on aggregate related facilities include the ATCMS for stationary diesel engines, portable diesel engines, and idling. The District will be the primary agency responsible for enforcing the ATCMS and will continue to track ATCM development and implementation.

In regards to air quality related improvements that the County could be conscious of during your interim Permit Review, the District would offer the following as suggestions:

- 1) Based on meetings with multiple facilities, one issue that appears to be common to the aggregate facilities is the purported lack of adequate electric utility power for crushing operations. As all of the facilities are pulling from roughly the same supply, we have observed that for many of these facilities, the sand supply is short and therefore the facilities are requesting the ability to crush pea gravel with diesel driven equipment in order to make sand.

For the long term, onsite power generation with diesel engines is not the solution. The District recommends that efforts be taken to encourage improvements in the electric utility infrastructure in the area surrounding these facilities.

- 2) Continue to encourage the use of cleaner vehicles and equipment and/or the retrofit of existing vehicles and equipment with diesel particulate filters (DPFs).

Aside from the traditional regulated sources of emissions and reductions, the District would like to acknowledge and commend some of the efforts taken by some of the aggregate facilities in Yolo County. These efforts have included such steps as voluntary NOx reductions from purchasing cleaner vehicles, installation of electrically powered conveyor lines, and use of liquefied petroleum gasoline (LPG) for asphalt batch plants.

If you have any questions or comments, please contact me at (530) 757-3665 or toll-free in the (530), (916), and (707) area codes at (800) 287-3650.

Sincerely,

Paul Andrew Hensleigh  
Deputy Air Pollution Control Officer

cc: Heidi Tschudin, Tschudin Consulting Group, 710 21st Street, Sacramento, CA 95814