

## **CHAPTER 8 7**

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### **STATE ~~AND FEDERAL~~ CLEAN AIR ACT REQUIREMENTS**

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## **8.7. STATE AND FEDERAL CLEAN AIR ACT REQUIREMENTS**

### **8.17.1 INTRODUCTION**

This 2007 2010 Clean Air Plan (2007 2010 Plan) is being prepared by the Santa Barbara County Air Pollution Control District (APCD) to satisfy various mandates of the 1990 federal Clean Air Act Amendments (Federal Act) and the California Clean Air Act of 1988 (State Act). This chapter presents an overview of all state and federal clean air act requirements and discusses how the work completed in conjunction with this 2007 2010 Plan complies with all applicable requirements.

### **8.2 FEDERAL CLEAN AIR ACT MANDATES**

The USEPA issued guidance for states in preparing maintenance plans required under section 110(a)(1) of the federal Clean Air Act. The five required plan components and how this 2007 Plan addresses those components are summarized below and discussed in greater detail in *Chapter 7*, sections 7.2 to 7.6. Federal mandates required when we were classified as a “serious” ozone nonattainment area are discussed in the 2001 Plan.

**Attainment Inventory:** *The attainment inventory should be based on actual “typical summer day” emissions of volatile organic compounds and nitrogen oxides with the base year being either 2001, 2002 or 2003.*

The NO<sub>x</sub> and ROC Planning Inventory for 2002 presented in *Chapter 3* satisfies this requirement.

**Maintenance Demonstration:** *The maintenance plan must demonstrate how the area will remain in compliance with the 8-hour ozone standard for a ten year period following the effective date of designation as unclassifiable/attainment. At a minimum the plan must project attainment for 2014.*

Absent Outer Continental Shelf marine vessel emissions, our NO<sub>x</sub> and ROC emissions are projected to decline from 2002 through 2014. However when NO<sub>x</sub> emissions from these vessels are included in the inventory, our 2014 NO<sub>x</sub> emissions are anticipated to be over 15 tons/day greater than in 2002. With increasing difficulty in obtaining added reductions from onshore sources, further reductions will clearly need to come from controlling marine shipping activities in order to meet air quality goals. This clearly indicates that additional action from the USEPA and ARB is required.

**Ambient Air Quality Monitoring:** *The State should continue to operate air quality monitors in accordance with 40 CFR 58 to verify maintenance of the 8-hour standard. Any modifications to the ambient monitoring network should be accomplished through close consultation with the EPA Regional office.*

As described in *Chapter 2*, our monitoring network fulfills this requirement.

~~**Contingency Plan:** The State must develop a contingency plan that at a minimum will ensure that any violation of the 8-hour ozone standard is promptly corrected. The contingency plan should ensure that the contingency measures are adopted expeditiously once they are triggered. The trigger for implementing contingency measures should, at a minimum, be upon a monitored violation of the 8-hour ozone standard.~~

~~Chapter 4 addresses the emission control measures proposed by the APCD as contingency measures.~~

~~**Verification of Continued Attainment:** The maintenance plan should indicate how the State will track the progress of the maintenance plan. States should develop interim emission projections to show a trend analysis for maintenance of the standard.~~

~~Progress will be track via the triennial updates (mandated by Health and Safety Code sections 40924 and 40925) to our State air plan to attain the state 1-hour ozone standard.~~

~~**Conformity:** Conformity for the federal 1-hour ozone standard and federal 8-hour ozone standard no longer applies to Santa Barbara County.~~

## **8.3-7.2 CALIFORNIA CLEAN AIR ACT MANDATES**

As indicated previously, an integral objective of this ~~2007~~ 2010 Plan is to satisfy the requirements of the California Clean Air Act (~~State Act~~). The APCD is required to submit a triennial progress report and a triennial update to the 1991 Air Quality Attainment Plan under the provisions of the State Act. Recognizing that many of the required submittals duplicate those mandated by the Federal Act, the APCD has developed this ~~2007~~ Plan to address all state and federal planning requirements.

### **8.3-1-7.2.1 TRIENNIAL PROGRESS REPORT**

**Section 40924(b)** of the California Health and Safety Code (H&SC) requires the APCD to conduct an assessment of its air quality control program every three years, starting in 1994. This assessment must address the expected and revised emission reductions scheduled for adoption during the previous three years. This triennial report must also include an assessment of progress based on monitored pollutant levels, modeling techniques and air quality indicators.

The emission control measures are presented in *Chapters 4* and *Chapter 5*. In addition, **Table 8-1 7-1** summarizes APCD rule activity from 2007 – 2009 ~~1998 to 2006~~. A summary of ambient air quality data and the air quality indicators for Santa Barbara County is presented in *Chapter 2*.

### **8.3.2.7.2.2**

### **TRIENNIAL PLAN REVISION**

**H&SC Section 40925(a)** requires the APCD to review and revise its attainment plan at least once every three years, beginning in 1994. The review and revisions are to correct for any deficiencies in meeting the interim measures of progress incorporated into the plan pursuant to **Section 40914** [emission reductions], and to incorporate new data or projections.

**Correct Deficiencies in Meeting Interim Measures of Progress:** The APCD has not identified any significant deficiencies in meeting the 1991 AQAP rule adoption schedule. *Chapters 4* and *Chapter 5* present a discussion of the stationary source and transportation control measures as well as an updated adoption schedule for each proposed control measure.

**Incorporate New Data and Projections:** This plan includes a reassessment of emission growth forecasts and control measure effectiveness estimates presented in *Chapter 4*, *Chapter 5*, and *Chapter 6*.

### **8.3.3.7.2.3**

### **OVERALL PLAN REQUIREMENTS**

**Sections 40912 through 40922 of the H&SC** specify overall requirements that apply to any plan submitted to the ARB to satisfy the State Act requirements. The requirements applicable to Santa Barbara County are discussed below.

**Transport Mitigation (H&SC Section 40912):** Prior to 2004 Santa Barbara County was identified as a transport contributor (as part of the South Central Coast Air Basin) to the South Coast Air Basin. The APCD satisfied the transport mitigation requirements through the application of Best Available Retrofit Control Technology (BARCT) requirements by January 1, 1994. In 2004, ARB re-assessed transport impacts of Santa Barbara County to the South Coast and found our contribution to 2000 through 2003 South Coast exceedances to be inconsequential."

**Cost Effective Strategy (H&SC Section 40913(b)):** A cost effectiveness analysis of the control measures is included in *Chapter 4* and Appendix C of the 1991 AQAP and Appendix B of the 2001 Plan. For control measures which are newly proposed in Chapter 5 of this 2010 Plan (i.e., those measures not proposed in the 2007 Plan), these measures have been implemented in other air districts and are thus assumed to be cost-effective. A detailed cost-effectiveness study of each measure will be conducted during the rulemaking process.

**Annual Emissions Reduction (H&SC Section 40914):** The APCD must demonstrate a reduction in APCD emissions of five percent or more per year for each nonattainment pollutant averaged over every consecutive three-year period. In the 1991 AQAP, the APCD identified every feasible control measure in lieu of the five percent annual emission reduction requirement. The 1998 Clean Air Plan was conditionally approved by the ARB (Resolution 99-2b) with the requirement that APCD provide a schedule to review the further study measures identified in the plan, complete this review, and make any appropriate rulemaking commitments based on this review. This ~~2007~~ 2010 Plan includes the results of this review and identifies every feasible measure in ~~Chapter 4 and~~ *Chapter 5*.

**Contingency Measures (H&SC Section 40915):** Contingency measures are to be implemented in the event the ARB finds that the APCD fails to meet interim goals or maintain adequate progress towards attainment. Proposed contingency measures are discussed in *Chapters 4* and *Chapter 5*.

**Moderate Air Pollution Areas (H&SC Section 40918(a)):** The attainment plan must include the following:

- (1) A stationary source control program which achieves no net emission increases for sources which emit or have the potential to emit 25 tons per year of any nonattainment pollutant;
- (2) Stationary sources which emit more than 250 tons per year must be equipped with best available retrofit control technology;
- (3) Reasonable available transportation control measures;
- (4) Provisions to develop an area-wide source and indirect source programs;
- (5) An emissions inventory system; and
- (6) Public education programs.

APCD Regulations II (Permits) and III (Prohibitions) fulfill the first two requirements. Transportation control measures that are described in *Chapter 5* of this document fulfill the third requirement. The APCD has an inventory system in place that was utilized to prepare the emissions inventory presented in *Chapter 3* to fulfill the fifth requirement. The fourth and sixth requirements are fulfilled with the APCD public education, area-wide and indirect source, and other programs, which are described in *Chapter 8* of the 2001 Plan.

**Control Measure Cost-Effectiveness (H&SC Section 40922):** Analysis of control measure cost effectiveness was included in *Chapter 4* of the 1991 AQAP and in Appendix B of the 2001 Plan. For control measures which are newly proposed in Chapter 5 of this 2010 Plan (i.e., those measures not proposed in the 2007 Plan), these measures have been implemented in other air districts and are thus assumed to be cost-effective. A detailed cost-effectiveness study of each measure will be conducted during the rulemaking process.

#### **8.4.7.4 CONCLUSION**

This ~~2007~~ 2010 Plan was prepared by the Santa Barbara County APCD to address all applicable state ~~and federal~~ mandates. Specifically, this ~~2007~~ 2010 Plan provides ~~a maintenance demonstration for the federal 8-hour ozone standard and provides~~ for expeditious attainment of the state 8-hour ~~1-hour~~ ozone standard and maintenance of the state 1-hour ozone standard. Moreover, this ~~2007~~ 2010 Plan complies with all applicable sections of ~~the 1990 Federal Clean Air Act Amendments and~~ the California Health and Safety Code.

**TABLE 8-1**

<p align="center"><b>SANTA BARBARA COUNTY APCD RULE ACTIVITY FROM 2007-2006-2009</b>  <b>SUMMARY OF MEASURES (RULES ADOPTED OR IMPLEMENTED)</b></p>					
Rule #	CAP ID#	Description	Adoption Date	Implementation Date	Comments
323	R-SL-1	Architectural Coatings	November 2001	January 2003	Rule 323 was amended on November 15. The revised rule included three effective dates for coating ROC content limits: July 19, 1996, November 15, 2001, and January 1, 2003.
325	R-PT-2	Crude Oil Production and Separation	July 2001	April 2002	The January 2001 and July 2001 revisions to the rule affected sources producing heavy oil. Such sources complying by installing emission control equipment had a deadline of April 18, 2001 to submit an Authority to Construct application. Or, if complying by replacing a tank, submit an Authority to Construct application by May 18, 2001. There were additional deadlines for obtaining an APCD approved exemption.
326	R-PT-2	Storage of Reactive Organic Compound Liquids	January 2001	April 2002	This revision to the rule affected sources storing heavy oil. Any source storing heavy oil needed to perform a test of the true vapor pressure and submit it to the APCD by April 18, 2001. Further, if the true vapor pressure test results indicated that the tank is not eligible for an exemption, the source needed to submit an Authority to Construct application no later than April 18, 2001. The deadline for submitting the Permit to Operate application for such a heavy oil storage tank was April 2002.
346	R-PP-9	Loading of Organic Liquid Cargo Vessels	January 2001	April 2002	The January 2001 revision to the rule affected sources with loading facilities for heavy oil. This rule has compliance schedule provisions similar to those in Rule 326.
360	N-XC-2	Emissions of Oxides of Nitrogen From Large Water Heaters and Small Boilers	October 2002	2003	Rule 360 is a point-of-sale rule that applies to only new and replaced units.

**TABLE 7-1 (CONTINUED)**

<b>SANTA BARBARA COUNTY APCD RULE ACTIVITY FROM 2007-2006-2009</b>					
<b>SUMMARY OF MEASURES (RULES ADOPTED OR IMPLEMENTED)</b>					
<b>Rule #</b>	<b>CAP ID#</b>	<b>Description</b>	<b>Adoption Date</b>	<b>Implementation Date</b>	<b>Comments</b>
361	N-XC-4	Small industrial and commercial boilers, steam generators and process heaters (> 2 MMBtu/hr to < 5 MMBtu/hr)	January 2008	January 2008	This is a new phase-in rule with a final compliance date of January 2010
333	N-IC-1 N-IC-3	Control of Emissions from Engines	June 2008	June 2008	This is a rule revision in response to ARB and EPA concerns
339	R-SC-4	Motor vehicle and mobile equipment surface preparation and coating operations	June 2008	January 2009	This is a rule revision with revised solvent cleaning requirements and solvent coating ROC content limits