

## **Comment 1 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: J. David

Last Name: Colfax

Email Address: Non-web submitted comment

Affiliation: County of Mendocino

Subject: Proposed ATCM Amendments for the In-Use Agricultural Engines  
Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/agen06/8-agen06-1.pdf'

Original File Name: agen06-1.pdf

Date and Time Comment Was Submitted: 2006-11-02 14:26:04

No Duplicates.

## **Comment 2 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Curt

Last Name: Josiassen

Email Address: Non-web submitted comment

Affiliation: BCC

Subject: Comments on Proposed Amendments to the Stationary Diesel Engine Control Measure  
Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/agen06/9-agen06-2.pdf'

Original File Name: agen06-2.pdf

Date and Time Comment Was Submitted: 2006-11-07 17:01:20

No Duplicates.

### **Comment 3 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Bill

Last Name: Connelly

Email Address: Non-web submitted comment

Affiliation: Butte Co. Air Quality Managment District

Subject: Proposed Amendments to the ATCM for Compression Ignition Engines

Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/agen06/10-agen06-3.pdf'

Original File Name: agen06-3.pdf

Date and Time Comment Was Submitted: 2006-11-09 10:52:27

No Duplicates.

## **Comment 4 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Andrea

Last Name: Fox

Email Address: afox@cbbf.com

Affiliation: California Farm Bureau Federation

Subject: AGENDA ITEM 06-10-5 – PROPOSED AMENDMENTS TO THE STATIONARY DIESEL ENGINE CONTROL MEASURE

Comment:

CALIFORNIA FARM BUREAU FEDERATION GOVERNMENTAL AFFAIRS DIVISION 1127  
- 11th Street, Suite 626, Sacramento, CA 95814 Phone (916)  
446-4647

November 10, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, CA 95814

RE: AGENDA ITEM 06-10-5 – PROPOSED AMENDMENTS TO THE STATIONARY DIESEL ENGINE CONTROL MEASURE

The California Farm Bureau Federation would like to submit the following comments regarding the Stationary Diesel Engine ATCM. The agricultural community is willing to reduce air emissions from our farms and ranches when the reductions are meaningful and necessary; there is sufficient time to comply; and incentives are available to make the changes in a cost-effective manner. Unfortunately, the compliance schedule currently proposed does not provide adequate time for complete and measured implementation of this rule.

1. We request that an additional year (at minimum) be added to all compliance dates for meeting emission standards for stationary diesel-fueled engines used in agricultural operations. This is especially important for Tier 0 (pre-1996) engines, which according to the September 2006 staff report represents 3,600 (42%) of the total engines affected by this proposed rule. The report concludes that the average size of diesel agricultural pump engines is approximately 200 hp. This means the majority of these engines will need to be replaced by December 31, 2010.

ARB staff has indicated following their current schedule they plan on this rule being finalized in July 2007. To be eligible for the Carl Moyer Program there must be a full 3 years of reductions before the compliance date. The timeline proposed in this rule would only leave five months for outreach and application of Carl Moyer funding for Tier 0 engines. This is not a sufficient time period for growers to become aware of the program and apply for incentive funding from various state or federal programs, including the USDA Environmental Quality Incentives Program (EQIP) that can have a limited application window early in a given year.

2. CARB should provide local air districts with additional financial support to enable them to recover the cost of implementation, including outreach and compliance assistance and extend the registration deadline by a year. Many districts do not have available funding to properly implement this rule. If districts

are not given adequate funding from CARB they will have to recover the many implementation costs by raising the registration and inspection costs which is not fair to the agricultural community that are bearing many new regulatory costs in a very short period of time since enactment of Senate Bill 700 (2004).

Without adequate funding they will not be able to do the outreach and compliance assistance that will be crucial to implement this rule. CFBF is very supportive of growers being able to use alternative fuels as a compliance method. How this will be put into practice needs to be available to the growers early in the process so they can weigh this option in deciding how to best comply with the engine rule. CFBF and other agricultural associations will be providing outreach to their members, but the state must step up to the plate and support outreach efforts if they are going to impose such a significant regulatory requirement on growers. Private entities and local air districts should not have to bear the entire burden of this new regulatory burden.

3. CARB needs to insure during their approval of district rules that discrepancies do not occur between local and state engine rules. It will be imperative that local districts do not set different engine standard criteria that could unintentionally allow a grower to purchase an older engine for a short period of time. Growers could purchase an older engine assuming they are in long-term compliance, only to have to replace the engine well before the useful life of the engine has occurred. The districts and state must be sending a consistent message to the agricultural community statewide so growers can make lasting and educated engine purchases.

Historically, agricultural engines have not been subject to local air district permitting or registration programs. This rule will have significant impact on agricultural community. CFBF asks that you take our points into consideration and make the suggested changes prior to rule approval.

Respectfully submitted by:

Cynthia L. Cory  
Director, Environmental Affairs

cc: Robert Fletcher, CARB  
Barbara Cook, CARB

Attachment: 'www.arb.ca.gov/lists/agen06/11-engine\_comments.pdf'

Original File Name: engine comments.pdf

Date and Time Comment Was Submitted: 2006-11-13 11:05:45

No Duplicates.

## **Comment 5 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Jamie  
Last Name: Song  
Email Address: jsong@meca.org  
Affiliation: MECA

Subject: Public Comments on the Proposed Amendments to the Stationary Diesel Engine Control Measure

Comment:

Please find attached the Manufacturers of Emission Controls Association's (MECA) public comments on the ARB's Proposed Amendments to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines.

Thank you.

Jamie Song

Attachment: 'www.arb.ca.gov/lists/agen06/12-arb\_in-use\_stationary\_ag.pdf'

Original File Name: ARB In-use Stationary Ag.pdf

Date and Time Comment Was Submitted: 2006-11-13 15:14:34

No Duplicates.

## **Comment 6 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Larry

Last Name: Allen

Email Address: lallen@co.slo.ca.us

Affiliation: CAPCOA

Subject: Comments on Proposed Amendments to the ATCM for Stationary Engines

Comment:

Attached are comments from CAPCOA on CARB's Proposed Amendments to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines.

Please contact me if you have any questions or concerns regarding this submittal.

Thank you,

Larry Allen  
CAPCOA President

Attachment: 'www.arb.ca.gov/lists/agen06/13-capcoacommentsonagatcm11-13-06.doc'

Original File Name: CAPCOACommentsonAgATCM11-13-06.doc

Date and Time Comment Was Submitted: 2006-11-13 17:16:49

No Duplicates.



## **Comment 7 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Jon

Last Name: Fadhl

Email Address: jon.fadhl@siemens.com

Affiliation: Siemens Medical Systems, Inc.

Subject: Farm Diesel Ingins. Small farmer input

Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/agen06/14-agen06-7.pdf'

Original File Name: agen06-7.pdf

Date and Time Comment Was Submitted: 2006-11-14 10:24:54

No Duplicates.

## **Comment 8 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Doug  
Last Name: Quetin  
Email Address: dquetin@mbuapcd.org  
Affiliation: MBUAPCD

Subject: Comment Letter from MBUAPCD  
Comment:

Comment Letter from MBUAPCD

Attachment: 'www.arb.ca.gov/lists/agen06/15-mbuapcd\_comment\_ltr.pdf'

Original File Name: MBUAPCD Comment Ltr.pdf

Date and Time Comment Was Submitted: 2006-11-14 11:35:29

No Duplicates.

## **Comment 9 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Karl  
Last Name: Lany  
Email Address: klany@scec.com  
Affiliation:

Subject: 93115.6(a)(3)(A)(2)  
Comment:

Comments regarding CARB's proposed alternative demonstration of compliance with provisions calling for 0.01 g/bhp-hr PM and the need to expand the provision to Tier 2 engines are attached.

Attachment: 'www.arb.ca.gov/lists/agen06/16-stationary\_atcm\_comments.pdf'

Original File Name: stationary atcm comments.pdf

Date and Time Comment Was Submitted: 2006-11-14 12:25:26

No Duplicates.

## **Comment 10 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Paul

Last Name: Buttner

Email Address: pbuttner@calrice.org

Affiliation: California Rice Commission

Subject: Proposed In-Use Stationary Agricultural Engine Regulation

Comment:

Proposed In-Use Stationary Agricultural Engine Regulation

Attachment: 'www.arb.ca.gov/lists/agen06/17-crc\_paul\_buttner.pdf'

Original File Name: CRC Paul Buttner.pdf

Date and Time Comment Was Submitted: 2006-11-14 14:05:24

No Duplicates.

## **Comment 11 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Rick

Last Name: McVaigh

Email Address: Non-web submitted comment

Affiliation: SJVAPCD

Subject: Proposed Amendments to the Stationary Diesel Engine ATCM

Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/agen06/18-agen06-11.pdf'

Original File Name: agen06-11.pdf

Date and Time Comment Was Submitted: 2006-11-14 14:27:46

No Duplicates.

## **Comment 12 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Darlene

Last Name: Din

Email Address: darlenedin@sbcglobal.net

Affiliation: Agricultural Policy/Land Use Consultant

Subject: Extent timeline for Tier 3/4 Stationary engines

Comment:

I am writing on behalf of my agricultural clients in the Central Coast of California in the Monterey Bay, we have worked cooperatively with our local Air District Board and Staff, our area currently meets Federal Air Standards, and most State Standards.

Many of the operations on the Central Coast have been proactive replacing there Stationary Ag engines through the Carl Moyer program and their own capital budgets of their farming operation. The concern is that the only engines available to purchase are Tier 2 engines, and will need to be replaced within a short window. The normal, well maintained diesel engine can easily have a forty year life. We would request that the State review the timelines of replacement of this engines- many of the engines needed are NOT YET available in Tier 3, and we have been informed that Tier 4 has not yet received approved manufactures' standards. My clients have supported the solution to come from the manufacture as the source providing a "cleaner" engine for the consumer to purchase.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-15 10:09:54

No Duplicates.

## **Comment 13 for Stationary Diesel Agricultural Engines (agen06) - 45 Day.**

First Name: Robert

Last Name: McLaughlin

Email Address: bmclaughlin@bcaqmd.org

Affiliation: Butte County AQMD

Subject: Proposed amendments to the Stationary Compression Ignition ATCM

Comment:

See attached comment letter.

Attachment: 'www.arb.ca.gov/lists/agen06/20-  
comments\_on\_the\_proposed\_amendments\_to\_the\_atcm.pdf'

Original File Name: Comments on the proposed amendments to the ATCM.pdf

Date and Time Comment Was Submitted: 2006-11-15 11:30:17

No Duplicates.

## **Comment 1 for Stationary Diesel Agricultural Engines (agen06). (At Hearing)**

First Name: James

Last Name: Wagner

Email Address: Non-web submitted comment

Affiliation: Butte Co. Air Quality Managment District

Subject: Proposed Amendments to the ATCM for Stationary Compression Ignition Engines  
Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/agen06/21-agen06-ws-1.pdf](http://www.arb.ca.gov/lists/agen06/21-agen06-ws-1.pdf)

Original File Name: agen06-ws-1.pdf

Date and Time Comment Was Submitted: 2006-11-21 10:51:40

No Duplicates.



## **Comment 2 for Stationary Diesel Agricultural Engines (agen06). (At Hearing)**

First Name: Curt

Last Name: Josiassen

Email Address: Non-web submitted comment

Affiliation: Sacto.Valley Basinwide APCC

Subject: Proposed Amendments to the ATCM for Stationary Compression Ignition Engines  
Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/agen06/22-agen06-ws-2.pdf](http://www.arb.ca.gov/lists/agen06/22-agen06-ws-2.pdf)

Original File Name: agen06-ws-2.pdf

Date and Time Comment Was Submitted: 2006-11-21 10:53:11

No Duplicates.

## **Comment 1 for Stationary Diesel Agricultural Engines (agen06) - 15-1.**

First Name: John A.

Last Name: Paoluccio PE

Email Address: johnpaoluccio@sbcglobal.net

Affiliation:

Subject: Stationary Diesel Engine Control Measure

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/agen06/73-diesel\\_arb\\_4-19-07.doc](http://www.arb.ca.gov/lists/agen06/73-diesel_arb_4-19-07.doc)

Original File Name: Diesel ARB 4-19-07.doc

Date and Time Comment Was Submitted: 2007-04-19 13:20:42

No Duplicates.

## **Comment 2 for Stationary Diesel Agricultural Engines (agen06) - 15-1.**

First Name: W. James

Last Name: Wagoner

Email Address: [jwagoner@bcaqmd.org](mailto:jwagoner@bcaqmd.org)

Affiliation: Butte County AQMD

Subject: Ag Engine ATCM

Comment:

Comments on the 15-day changes to the Airborne Toxic Control  
Measure for Stationary Compression Ignition Engines

Attachment: [www.arb.ca.gov/lists/agen06/74-ag\\_atcm\\_15-day\\_comment-final.pdf](http://www.arb.ca.gov/lists/agen06/74-ag_atcm_15-day_comment-final.pdf)

Original File Name: AG ATCM 15-day comment-final.pdf

Date and Time Comment Was Submitted: 2007-04-25 14:05:28

No Duplicates.

### **Comment 3 for Stationary Diesel Agricultural Engines (agen06) - 15-1.**

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: Stationary Diesel Engine ATCM-15 day comment period

Comment:

ARB Staff has indicated that the directive from the state board to provide an extra two years for Carl Moyer eligibility for growers needing to comply with the Stationary Diesel Engine ATCM Carl Moyer funding will be included in their Final Statement of Reasons. It will be important for ARB Staff to provide outreach to the local air districts and agricultural community so they are aware of this available funding. This ability to get Carl Moyer funding is imperative since the rule will go into effect before growers had three years previous notice and could apply to fit the current time limitations.

California Farm Bureau Federation is extremely concerned about the cumulative impact to the agricultural community of this ATCM in combination with upcoming diesel regulations. We are willing to work with ARB and the local districts to educate growers about these new engine requirements but there needs to be a concerted effort by ARB to insure sufficient outreach occurs statewide. The current fact sheet needs to be updated to clearly lay out the key ATCM requirements of this 60 page rule in a succinct manner and be easily available to find on the ARB website.

As stated in our November 2006 ATCM comments, CFBF is very supportive of growers being able to use alternative fuels as an alternative compliance mechanism as stated in the ARB workshops regarding this ATCM. State ARB staff need to take the lead in helping provide districts with direction on how this could be put into practice as they often have limited staff and would not be able to provide the necessary structure for this new effort. Even if complete compliance is not achievable, since ARB offered this as an option, ARB needs to provide information and guidance that could truly make this a viable choice and not just a good idea that is nothing more than wishful thinking.

Thank you for the opportunity to comment. We look forward to working with ARB to insure that adequate outreach and financial incentive occurs along with alternative fuel guidance that provides a feasible compliance mechanism.

Sincerely,

Cynthia L. Cory

Director, Environmental Affairs

California Farm Bureau Federation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-04-25 16:32:52

No Duplicates.