

From : SJBL/CD

PHONE No. : 989 654 3157

Dec. 06 1996 7:43PM PEG

Comment Letter #13

U.S.D.A. Natural Resources Conservation Service
December 6, 1996

cc: Harold R. Road, State Conservationist, NRCS, Davis
Gary L. Bullard, Acting State Resources Conservationist, NRCS, Davis
William J. Gradio, Area Conservationist, NRCS, Salinas

0120

TOP : 01/01/97 PHONE NO. : 309 504 3137 FAX : 309 504 3138



United States
Department of
Agriculture

Natural
Resources
Conservation
Service

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Comment Letter #13
U.S.D.A. Natural Resources Conservation Service
December 6, 1996

December 6, 1996

Mr. Melvin Zeldin
Planning and Policy
South Coast Air Quality Management District
21863 Copley Drive
Diamond Bar, CA 91765

Dear Mr. Zeldin,

Thank you for the opportunity to comment on the proposed amended Rule 403 Fugitive Dust. As you may be aware, the USDA Natural Resources Conservation Service has been in a re-organization phase for the past two years. With this change in mind, the following comments are directed to the telephone provisions under PAR 403 (b) page 403-11.

The Natural Resources Conservation Service (NRCS) is part of the U.S. Department of Agriculture (USDA) responsible for protecting the nation's natural resources including soil, water, air, plants, and animals (SW/PA) on privately owned land. NRCS's mission is to treat resource problems and maintain the sustainability of natural resources through planning and the application of conservation practices, by providing technical assistance to local landowners, groups, tribes, and units of government. The NRCS provides all assistance on a voluntary basis. NRCS also provides the technical assistance to carry out other mandated, USDA natural resource programs on private land. The NRCS recognizes the need to coordinate its goals related to the air resources with those related to agriculture on privately owned land.

We appreciate the recognition given to the Field Office Technical Guide issued by the USDA Natural Resources Conservation Service. We believe this document is the leader in providing conservation practice alternatives to all wanting assistance.

The above mentioned re-organization has caused a number of field office closures and staff reductions/relocations. With this in mind and with our present workload and the request South Coast has afforded the NRCS, we see a real concern and impossibility in providing landowners of agriculture land with a commitment of our resources to provide them with a soil conservation plan by December 31, 1996.

Again, Thank you for the opportunity to address this issue. If I can be of any assistance please feel free to contact me.

Edward M. Umbeck
Edward M. Umbeck
Arling Area Conservationist

The Natural Resources Conservation Service,
formerly the Soil Conservation Service,
is an agency of the
United States Department of Agriculture

AN EQUAL OPPORTUNITY EMPLOYER

13-1

13-1 The District acknowledges the commentor's concerns over implementation of the PAR 403 soil erosion control plan provisions. The District is presently working with the NRCS staff to identify a strategy to target the highest dust producing farm activities (i.e., dry land farming) or extending the letter of intent deadlines. It is the District's intent to work with the NRCS to lessen the PAR 403 administrative burden while still achieving the emissions reductions.

01119

Comment Letter #14
John Billheimer
Consultant
December 1, 1996

**ROAD RECOGNIZES MOUNTAIN AREA FOR
EXEMPTION FROM COASTAL BASIN
AIR POLLUTION RULE.**

- (1) In amending its Architectural Coating Rule 1113, the
(2) South Coast Air Quality Management District Nov. 8th,
(3) exempted 'Lacquers and Stains above 4000 ft.' from its strict
(4) future standards for the 'VOC' (Volatile Organic Compounds
(5) or 'Solvents') control for coating applied to stationary
(6) structures such as houses and buildings.
- (7) (2) Recognizing that unfiltered solar radiation at high
(8) altitudes as well as severe weather changes, plays
(9) havoc with exterior finishes, the Air Quality District
(10) exempted such operations above 4000 ft. elevation from
(11) the strict limits imposed by the 1997 Air Quality Manage-
(12) ment Plan for the Coastal Plain.
- (13) (3) Aside from a prior exemption for certain operations
(14) at Bkt Resorts, this is the first official recognition
(15) that altho the Arrowhead/Big Bear mountain communities
(16) receive most of their air pollution by overflow ('transport')
(17) from the Coastal Plain, very little or none of the pollutants
(18) generated at upper elevations find their way back into the
(19) LOWER elevation air mass, the so-called 'inversion layer',
(20) which caps the Coastal Plain at about 2000-3000 ft. above
(21) ground level.
- (22) (4) When the Air Pollution District was formed about 1971,
(23) to consist of the four counties Los Angeles, Orange,
(24) Riverside and San Bernardino, and the State Air Resources
(25) Board (SRB) divided all California into about 8 'Air Basins'.
(26) the 'South Coast Air Basin' was separated from the Southeast
(27) Desert Air Basin by approximately the National Forest bound-
(28) dary, essentially the TENJIN line from Cajon Pass thru Lake
(29) Silverwood, the Arrowhead and Big Bear Water Reclamation
(30) Works on the North Slope about 4000 ft., to the Northeast
(31) tip of Baldwin Lake.

VOL-DOCLIBP796J [c:\cunp\p] p. 1: 51 JBB: 12-01-1996: 18:12:11

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14-1 The District acknowledges the background information
presented by the commentor

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Comment Letter #14
John Billheimer
Consultant
December 1, 1996

14-1
(cont)

0122

14-2

(1) \DOCLMTC\wctmnpv.0401 - 2 -
(2) (5) Refinements in modeling of the migration of the air
(3) mass shows that the mountain elevations are affected by,
(4) BUT DO NOT AFFECT the air quality in the Coastal Plain.
(5) This raises a question of whether the mountain communities,
(6) in effect the National Forest, should be in the 'Coastal'
(7) air basin as a recipient of air pollution, or in the 'Desert'
(8) as a (local or minor) source of air pollution. Without
(9) discussing this complex boundary issue, the South Coast
(10) District has granted this crucial exemption for Staines and
(11) Lacquers above 4000 ft. elevation) that is, recognizing the
(12) extreme effect of weather and solar radiation at higher alti-
(13) tudes on external coatings.
(14)
(15) (6) Now the Air Quality District must adopt further controls
(16) on PM-10, the fine particulate dust that is less than
(17) 10 microns in particle size and is capable of penetrating
(18) the nasal defenses and imparting severe lung damage. Thus
(19) Rule 1185, is to be 'workshopped' for the Public on Dec. 4,
(20) with end of comment period Dec. 6; then a 'Set Hearing'
(21) (30-day notice) Dec. 13, and formal Public Hearing for Rule
(22) Adoption by the Board scheduled for Jan. 10, 1997. All
(23) hearings are at the Air Quality District headquarters in
(24) Diamond Bar.
(25)
(26) (7) Although such 'dust' particles are extremely controlled
(27) from industrial sources, such as cement plants, grain
(28) mills and refineries (using filters, baghouses, scrubbers,
(29) etc.), much of the remaining mineral dust or fine suspended
(30) particulate material comes from entrainment of road dust,
(31) both paved and unpaved roads (other significant categories
(32) are agriculture and construction).
(33)
(34) (8) Just as with the many rules directed at industry, this
(35) Rule 1185 with regard to road dust is directed at the
(36) 'cities and counties' as the 'owners and operators' of the
(37) roads. Aside from the Paved Roads, which are primarily a
(38) City Problem, the unpaved roads in the mountain areas become
(39) a significant part of this rule. The rule proposes that
(40) all unpaved roads be systematically paved (or equivalent
(41) chemical stabilization) at the rate of 10% per year until
(42) substantially eliminated—also a speed limit of 15 MPH
(43) be imposed. (It might be said that 15 mph is all that most
(44) of the dirt roads will take anyway, but that is a separate
(45) issue.)
(46)
VOL-DOCLMTC\wctmnpv] p.2: 45 JBB: 12-01-1996: 18:15:09

14-2 Please refer to response to comment 3-6.

Comment Letter #14
John Billheimer
Consultant
December 1, 1996

14-3

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(17) Whether such a paving mandate is reasonable and necessary for the mountain areas is the issue.
(18)
(19) As stated before, the road dust part of this rule is directed to the 'cities and counties' that are the owners and operators of the roads, and for the unpaved roads, mostly the counties. The fiscal significance to the unincorporated areas on the peripheries of the cities is obvious. Whether this should be applied in the mountains is in debate.
(20)
(21) It has been proposed that the mandatory paving (or chemical stabilization or 15 mph speed limit)--- Rule 1186 (d-3), be limited to 50, 100, 500 vehicle trips per day. [Average daily trips during a specified 24-hour time period as determined by the most recent Institute of Transportation Engineers trip generation manual--1186 (c-1).]
(22)
(23) It is also proposed to exempt such operations above 3000 ft. elevation. Altho such a control of unpaved road dust might be desirable to the Mountain communities if they could afford it, there is scant likelihood that mountain-generated road dust will find its way down into the coastal air mass and affect the attainment of PM-10 in the Coastal Air Basin. Thus justification of this exemption on technical grounds as well as fiscal reasons is worthy of consideration.
(24)
(25) It is thus recommended that the Arrowhead/Big Bear area inventory its possibly affected dirt roads,
(26) establish traffic counts thereon with respect to possible exemption thresholds of 50, 100, 500 vehicle trips per day, and the finances available to pave (or chemically stabilize) 10% thereof per year, if the altitude exemption is not obtained. To be most effective this information should be submitted to the AQMD before Close of Comment Dec. 6th, and reinforced by Public Presentation at the Rule Adoption proceedings Jan. 10, 1997.
(27)
(28)
(29)
(30)
(31)
(32)
(33)
(34)
(35)

VCL=DOCLSEP796J [mtcunpv] p.3: 41 J88: 12-01-1996: 18:16:40

14-3 Please refer to response to comment 12-1.

01223

Draft Staff Report

Dec-06-96 16:49 G.C.S. Western Power S. Ca

P.02

Comment Letter #15
GCS Western Power and Equipment
December 6, 1996

12/6/96.



Laki T. Pispoulos, Ph.D., P.E.
South Coast Air Quality Management District,
21865, East Copley Drive,
Diamond Bar, CA 91765.

Dear Sir,

The purpose of this correspondence is to clarify the position of
TYMCO Regenerative Air Sweepers' relative to certain comments
conveyed at the recent December 4th, 1996 Public Workshop held at
your Diamond Bar facility.

One of the concerns addressed was whether or not a PM 10 efficient
sweeper is capable of sweeping trash, litter and rocks. The TYMCO
Model 600 BAW equipped with the Low Emissions package is completely
capable of achieving the same performance level as a standard Model
600 BAW, which has been proven to accomplish these tasks.

However, it is imperative that the sweeper be properly operated and
serviced in order to maintain an acceptable PM 10 efficiency.
Should you have any further questions, please do not hesitate to
contact us.

15-1

15-1

The District appreciates the street sweeper information presented
by the commentator. Issues such as PM₁₀-efficient street sweeper
availability will be discussed in the working group (see response
to comment 3-3).

Yours faithfully,

Geoffrey Harrison,
Geoffrey Manager.

0124

CASE

1781 Red Avenue • Huntington, CA 92033 • (910) 948-0000 • Fax: (910) 948-0004 • Toll Free: (800) 841-0000
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Comment Letter #16
City of Redlands
October 8, 1996

City of Redlands



REDLANDS FIRE DEPARTMENT
P.O. BOX 3005
REDLANDS, CA 92373

October 8, 1996

Jonathan D. Nailer
South Coast Air Quality Management Dist.
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Dear Sir:

The proposed Rule 403/1186 Involving Fugitive Dust Control is a concern to many Fire Departments in San Bernardino County, especially those who conduct annual weed abatement operations for fire hazard reduction.

The proposed Rule shall have a condition of exemption for emergency firefighting operations, post-disaster clearing, and annual weed abatement operations, where the use of clearing and moving is allowed at the Agency's discretion as the specific conditions exist to mitigate the fire hazard.

The Fire Service has been actively involved in fire hazard reduction, and without this worthwhile tool to protect property and lives, it would be placing our communities at undue risk.

I have enclosed a copy of the Mojave Desert's ruling. If you have any questions, you may contact me at (909) 798-7601.

Sincerely,

Leonard E. Tynoby
Leonard E. Tynoby
Fire Marshal
Fire Prevention Bureau

/s/
Encl.

P.O. BOX 3005 • REDLANDS, CA 92373

16-1 The weed abatement provisions have been removed from PR 1186. Please also refer to response to comment 1-5.

0125

APPENDIX A

PAR 403

NOTE: In order to avoid repetition, please refer to the proposed amendments to Rule 403 located elsewhere in this rule package.

APPENDIX B

PR 1186

NOTE: In order to avoid repetition, please refer to the Proposed Rule 1186 text located elsewhere in this rule package.

APPENDIX C

LIST OF BEST AVAILABLE CONTROL MEASURES

0128

BEST REASONABLY AVAILABLE CONTROL MEASURES

The left column contains a listing of the sources of fugitive dust which are intended for emission control under District Rule 403 and a listing of control measures and high-wind measures. The right column contains a description of the best available fugitive dust control measures for each of the sources.

Source: (1) Land Clearing/Earth-Moving

CONTROL MEASURES

DESCRIPTION

(A) Watering (pre-grading)

- (1) Application of water by means of trucks, hoses and/or sprinklers prior to conducting any land clearing. This will increase the moisture content of the soils, thereby increasing its stability.
- (2) Pre-application of water to depths of proposed cuts.
- (3) ~~Once the land clearing/earth moving activities are complete, a second round of watering can generate a thin crust which stabilizes the disturbed surface area provided that it is not further disturbed. (Security fencing can be used to prevent unwanted future disturbances of sites where a surface crust has been created).~~

(A-1) Watering (post-grading)

- (1) In active earth-moving areas water should be applied at sufficient frequency and quantity to prevent visible emissions from extending more than 100 feet from the point of origin.

(A-2) Pre-grading planning

- (1) Grade each phase separately, timed to coincide with construction phase; or
- (2) Grade entire project, but apply chemical stabilizers or ground cover to graded areas where construction phase begins more than 60 days after grading phase ends.

(B) Chemical stabilizers

- (1) Only effective in areas which are not subject to daily disturbances.
- (2) Vendors can supply information on product application and required concentrations to meet the specifications established by the Rule.

(C) Wind fencing

- (1) Three- to five-foot barriers with 50% or less porosity located adjacent to roadways or urban areas can be effective in reducing the amount of windblown material leaving a site. Must be implemented in conjunction with either measure (A-1) or (B).
- (2) ~~Would likely be used in conjunction with other measures (e.g., watering, chemical stabilization, etc.) to ensure that visible emissions do not cross the property line.~~

(D) Cover haul vehicles

- (1) Entire surface area of hauled earth should be covered once vehicle is full.

(E) Bedliners in haul vehicles

- (1) When feasible, use in bottom-dumping haul vehicles.

0129