



CENTER ON  
RACE, POVERTY  
& THE ENVIRONMENT



April 15, 2019

Mr. Richard Corey  
Executive Officer, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
<via email>

**RE: San Joaquin Valley PM2.5 Plan - Review of Largest Stationary Sources**

Mr. Corey,

The San Joaquin Valley's fine particulate matter (PM2.5) 2019 Integrated Attainment Plan (Plan) is designed to bring the San Joaquin Valley into attainment of federal health-based standards for PM2.5 within 5-7 years. However, the Plan's success relies on a host of uncontrollable variables, including \$5 billion in appropriations from the California State Legislature. The Central Valley Air Quality (CVAQ) Coalition and its partners urged the California Air Resources Board (CARB) in a letter dated January 22nd, 2019, to review additional emission-reduction opportunities in the event sufficient state funding is not appropriated, or if the Plan falls short of expectations in other ways. At CARB's Board meeting on January 24th, 2019, the California Air Resources Board concurred with the need for a "Plan B" and directed staff to, among other things, conduct a thorough review of emission-reduction opportunities at the Valley's largest stationary sources of pollution.

**This letter seeks to detail CVAQ's proposed stationary source review.** Such a review should include stationary sources that emit 10 tons or more of direct PM2.5 per annum - with the condition that all Valley-based sources belonging to one company be studied (see Table 1 below). This would include 27 facilities/corporate operations, including the Valley's 5 active biomass incinerators, 5 large natural gas power plants, 4 major glass manufacturers, and the Valley's 7 largest oil and gas producers. Together, these facilities represent at least 1,460 tons of

PM2.5 and 3,593 tons NOx emitted in the San Joaquin Valley annually. This equates to 58% of all PM2.5 and 72% of all NOx emitted from stationary sources in the Valley (2016 data, CEIDERS).

The following questions should be answered for each facility or corporate operation:

1. Amount and source of emissions (at least for PM2.5 and NOx). For oil and gas operations, we request all mobile, stationary and area sources of emissions are inventoried;
2. Type of pollution control equipment currently being used at each source (at least for PM2.5 and NOx control), and;
3. Emission-reduction opportunities at each source, including availability for BARCT retrofit, and cost.

We would also appreciate additional information for each facility or group of sources, including:

1. Compliance history (ie Notice of Violations and variance requests). If noticed, fine paid in relation to maximum penalty. For a facility with more than one notice of violation, we request CARB conduct an unannounced compliance test, and, if feasible, an unannounced source test; and
2. What, if any, ERCs the facility/company is using and for what sources.

We respectfully request CARB have a report publicly available with the aforementioned information, at least one month before the September, 2019, CARB Board Meeting.

Thank you very much,

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Executive Director  
Central Valley Air Quality (CVAQ) Coalition

*Nayamin Martinez*  
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CC: Kurt Karperos, Deputy Executive Officer, CARB  
Michael Benjamin, Chief, Air Quality Planning and Science Division, CARB  
Sylvia Vanderspek, Chief, Air Quality Planning Branch, CARRB  
Senator Dean Florez, CARB Board Member

**TABLE 1 - TOP STATIONARY SOURCES OF PM2.5 IN THE SJV AIR BASIN (2016)**

Facility Type	Facility Name	Facility ID	PM2.5	NOx
Oil and Gas	Chevron USA INC	1131	222.88	341
		1128	105.04	115.3
		1141	95.58	41
		311	70.46	60.8
		3317	2.9	9.6
		1129	5	8.4
		49	0.6	0.6
		<i>SUBTOTAL</i>	<b>493.88</b>	<b>576.7</b>
	Sentinel Peak Resources	1372	91.27	76.4
		<i>SUBTOTAL</i>	<b>91.27</b>	<b>76.4</b>
	Linn Operating, Inc.	1246	82.5	110.01
		3585	13.2	13.6
		2265	18.1	21.4
		1328	5.9	4.6
		1330	.1	.6
		<i>SUBTOTAL</i>	<b>119.8</b>	<b>150.21</b>
	Aera Energy, LLC	1547	77.9	249.1
		1135	25.3	97.5
		1121	15.6	29.5
		1543	.6	4.4
		1548	.3	3.4
		<i>SUBTOTAL</i>	<b>119.7</b>	<b>383.9</b>
	California Resources Production Corp	382	3.8	50.4
		2234	2	105

		1326	22.2	105
		1327	14.4	27.5
		1311	.1	.6
		40	.6	4.7
		1389	.4	3.1
		1737	4.5	15.4
		1738	.3	9
		8282	1.7	4.8
		8453	.1	.6
		<i>SUBTOTAL</i>	<b>49.83</b>	<b>326.1</b>
	Kern Oil & Refining Co.	37	15.7	50.7
		4162	0	.3
		<i>SUBTOTAL</i>	<b>15.7</b>	<b>51</b>
	Alon Bakersfield Refining	33	15.6	6.1
		34	.1	.7
		<i>SUBTOTAL</i>	<b>15.7</b>	<b>6.7</b>
	<b>OIL AND GAS TOTAL</b>		<b>905.88</b>	<b>1520.01</b>
<b>Biomass</b>	Covanta Stanislaus, Inc	2073	32.7	295.6
	Sycamore Cogeneration Co	511	27.8	103.9
	Rio Bravo Fresno	1820	25.4	21.4
	Kern River Cogeneration Co	88	15.9	49.5
	Dte Stockton, LLC	645	12.5	95.8
	<b>BIOMASS TOTAL</b>		<b>114.3</b>	<b>566.2</b>
<b>Glass</b>	Ardagh Glass Inc	801	23.2	142.7
	Gallo Glass Company	1662	15.5	274.2
	Vitro Flat Glass LLC	948	12.3	284.4

	Guardian Industries Corp	598	11.6	309.2
	<b>GLASS TOTAL</b>		<b>62.6</b>	<b>1010.5</b>
<b>Utility /Power Plants</b>	Elk Hills Power LLC	3523	81.5	25
	Sunrise Power Company	3746	75.9	61.5
	Walnut Energy Center Authority	7172	34.7	34
	Pastoria Energy Facility, Llc	3636	27.2	91.5
	La Paloma Generating Co LLC	3412	26.5	103.6
	<b>UTILITY TOTAL</b>		<b>245.8</b>	<b>315.6</b>
<b>Other</b>	Certaineed Corporation	3296	59.6	110.4
	Nestle Purina Petcare Company	1188	12.9	.2
	MB Technology	817	22.1	0 whi
	NAS Lemoore	2106	16.1	56.3
	J R Simplot Company	705	11.5	9.1
	Foster Food Products	1252	10.1	4.8
	<b>OTHER TOTAL</b>		<b>132.3</b>	<b>180.8</b>
<b>TOTAL</b>			<b>1460.88</b>	<b>3593.11</b>

Source: California Air Resources Board's Facility Search Engine (CEIDERS)  
<https://www.arb.ca.gov/app/emsinv/facinfo/facinfo.php?dd=>