



Shasta County

AIR POLLUTION CONTROL BOARD

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February 9, 2010

Lisa P. Jackson, Administrator
U. S. Environmental Protection Agency
Mail Code 6102 T
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: DOCKET EPA-HQ-OAR-2005-0172 "NATIONAL AMBIENT AIR QUALITY STANDARDS FOR OZONE", (75 FED. REG. 2938, JANUARY 19, 2010); COMMENTS FROM THE SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT (DISTRICT)

Dear Administrator Jackson:

The action contemplated by your agency as described in the Federal Register on January 19, 2010, will end the District's 30 years of continuous attainment with the Federal Ambient Air Quality Standard for Ozone. Since the inception of the Shasta County Air Quality Management District (District), we have promulgated rules, imposed standards, and issued enforcement actions on stationary sources with the single overriding goal of healthful air for the citizens of Shasta County. As a local District, these emission reductions have been imposed on the stationary sources of Shasta County only after approval by the District's elected Air Pollution Control Board.

The action your agency envisions with this ambient standard proposal will inflict an additional burden on the remaining industry in Shasta County, which will not measurably improve air quality unless all substantial industry in Northern California were to close. This burden will likely include: no net increase from individual sources, Title V permits will be required for additional sources, area sources will be subject to a multitude of new rules and mitigations, and emission offsets will become scarce. This burden will be placed on sources emitting only one third of the ozone precursors released in Shasta County. Reactive organic gases and oxides of nitrogen emissions in Shasta County are emitted in the following amounts:

	<u>Tons/Day</u>	<u>Percent of Total</u>
Stationary sources:	10.1	17
Area sources:	9.5	16
Mobile sources:	40.5	67

The District, along with our fellow Districts in the Sacramento Valley Air Basin and the California Air Resources Board, have made continual and lasting improvement in air quality for our region. Emission reductions imposed on stationary and area sources over the last 30 years have led to an overall steady decline in air pollution, as shown by the trend line on the attached graph. This steady reduction in stationary and area source emissions has allowed the Shasta County Air Quality Management District to remain in compliance with reasonable increasingly stringent ambient air quality standards.

Your agency has now determined that the legislative requirement to review the ambient air quality standards at five-year intervals, will not allow you to make changes of area designations in a timely manner. The recent designation of attainment status at 0.075 parts per million was made in a thoughtful manner and takes into account the factors of diminishing returns on ratcheting stationary sources and the lack of meaningful regulation of diesel engines by the EPA. Over 20 tons per day of Shasta County's emitted ozone precursors are from heavy duty trucks, diesel equipment, and trains. Your agency's reconsideration of the ozone ambient air quality standard, in order to designate the entire nation's more populated areas as nonattainment, will not increase the rate of ozone reduction, and for California it will likely actually delay improvement in ambient air quality.

A recent paper financed by the National Oceanic and Atmospheric Administration indicates that background ozone is increasing due to migration from the Far East. This is occurring while peak ozone values during the same time have been reduced. Local agencies in charge of enforcing requirements for healthful air have been successful at doing their job, while background levels from off-shore sources have increased.

The reason that the study of the health affects of ozone continue to indicate adverse impacts is that until recently the federal government has failed to provide any regulation of diesel engines used in inter-state commerce and policies which target individual industries (unbelievably complex and burdensome NESHAP rules) are driving industry to the Far East. The federal government's policy of increasing regulation while promoting free trade has resulted in manufacturing operations moving to areas with little environmental regulation and even less enforcement. This reconsideration of the existing ozone air quality standard will only serve to hasten the movement of industrial production and continue to increase emissions from mobile sources transporting goods.

As Administrator, of the U.S. EPA, you have the ability to redirect the agency from the current command and control path that will be the result of this reconsideration, and instead allow the 17,000 highly talented EPA employees to seek ways, for industry in the United States and overseas, to operate efficiently within an existing and consistent environmental setting. We strongly recommend that you drop this reconsideration of the ozone standard.

Very truly yours,



David A. Kehoe, Chairman
AIR POLLUTION CONTROL BOARD
County of Shasta, State of California

DAK/m

Enclosure: Graph

SHASTA COUNTY

Average of 4th Highest 8-Hr ambient ozone period in three years

