Seeking SIP Creditability for Voluntary Incentive-based Emission Reductions in California's San Joaquin Valley

**CPS 372 – Combustion System Improvement** 

USDA Air Quality Task Force Beltsville, Maryland December 4, 2013

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## **Today's Discussion**

- San Joaquin Valley State Implementation Plans
- National Air Quality Initiative
- Statements of Principles
- NRCS's Role



Photo by Johnnie Siliznoff, USDA NRCS

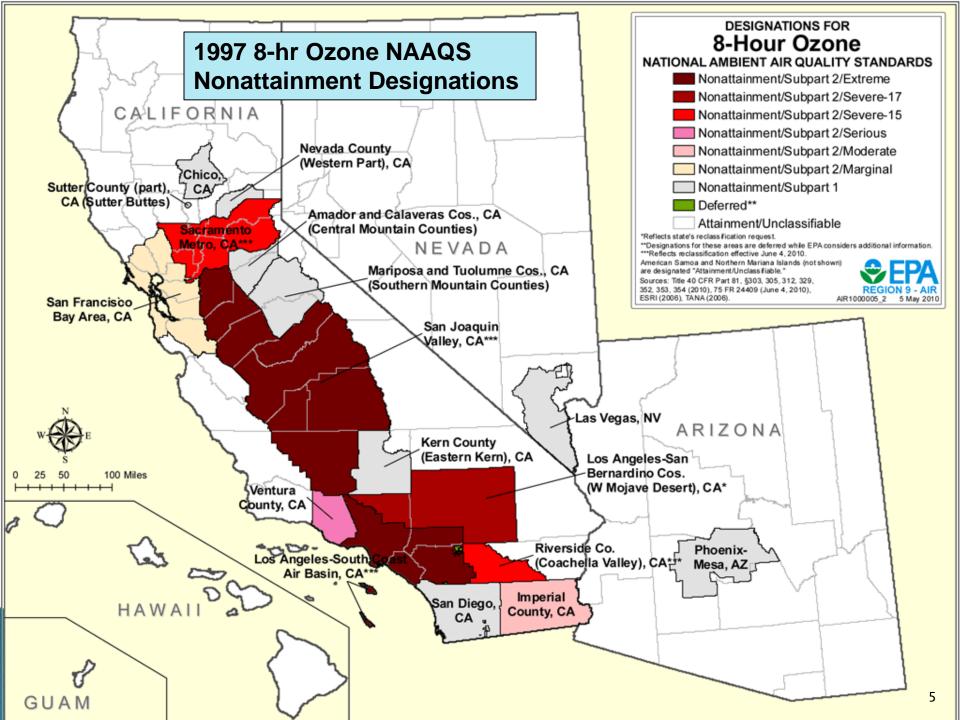
# State Implementation Plan (SIP)

- Required by the Federal Clean Air Act
  - Areas with unhealthy levels of criteria air pollutants
- Attainment plans are developed
  - Describe how the planning area will attain the NAAQS
  - Attainment deadlines are based on severity
  - Comprehensive and are not single documents
  - Different agency responsibilities and jurisdictions
- ARB is the lead agency for California and forwards the SIP to EPA-Region 9 for approval
- EPA publishes their findings in the Federal Register

# San Joaquin Valley Ozone SIPs

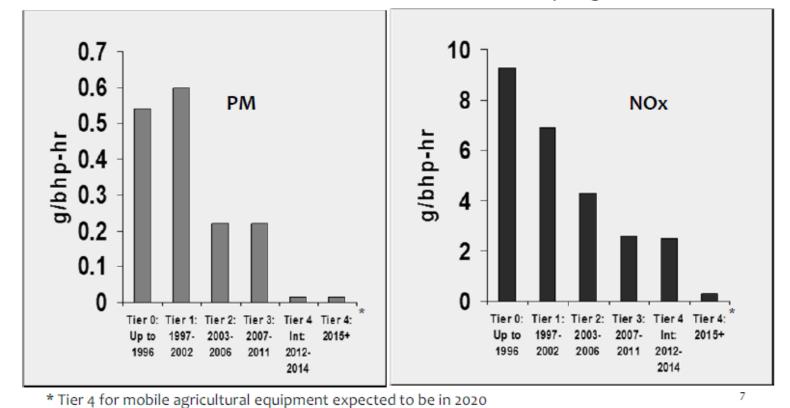
### 1997 8-hour ozone NAAQS (84 ppb)

- Air Resources Board Resolution 07-28, Appendix B,
  - Seeks 88-93 tons/day NOx reductions by 2017
  - 5-10 tons/day NOx reductions are from replacing in-use uncontrolled off-road mobile agricultural compressionignition (CI) engines with Tier 3- and Tier 4-emissions certified CI engines
- SJV Air Pollution Control District 2007 Ozone Plan
  - Seeks 465 tons/day NOx and 111 tons/day VOC reductions by 2023 from stationary and mobile sources
- Both plans rely on regulatory- and incentive-based emission reductions to achieve attainment goals



### How Cleaner Technologies Help Meet Near- and Long-Term Air Quality Goals

EXAMPLE: Emissions standards for 100-174 Hp engines



California Air Resources Board, March 13, 2013

### National Air Quality Initiative in California

- EQIP was reauthorized in the 2008 Farm Bill
- Strong partner support
  - Payments to improve off-road mobile ag engine emissions
  - Achieve attainment goals
- 2008 SJV Emissions Inventory
  - ARB reports 44.61 tons/day NOx from diesel-powered offroad mobile agricultural equipment
  - ARB is updating their emissions inventory
- Partnership with SJVAPCD
  - Methodologies and assistance
- FY2009 first year of implementation



# **Do incentives work for a SIP?**

Voluntary incentive-based emissions reductions could complement regulatory-based emission reductions by becoming SIP creditable

- EPA supports including incentive-based emission reduction benefits in SIPs
- ARB recognizes that voluntary incentives are critical toward achieving attainment goals
- SJVAPCD is committed to providing incentive funds per their 2007 8-hour Ozone Plan
- Strong partner support



# **Statement of Principles**

### San Joaquin Valley Statement Of Principles

- Signed in December 2010
  - EPA-Region 9, NRCS-CA, ARB, SJVAPCD
- Establishes a general framework for SIP creditability
- Voluntary reductions from mobile off-road ag equipment
- Recognizes the heavy investment made from the public sector and agricultural community for reducing emissions

### **National Statement of Principles**

- Signed in July 2012
  - US EPA and USDA NRCS

Ed Burton, California State Conservationist, Retired Fresno County Farm Bureau, May 2009



### **2010 SJV Statement of Principles**

- 1. The SJVAPCD, NRCS, ARB, and EPA will work collaboratively to develop a mechanism to provide SIP credit for emission reductions from incentive programs that meet the criteria of ensuring the reductions are **surplus, quantifiable, enforceable, and permanent**
- 2. The SJVAPCD and NRCS will each submit annual reports of prior year's completed projects and associated emission reductions to EPA and ARB
- 3. EPA will review the annual reports and credit the emission reductions if the four criteria are met
- 4. NRCS and SJVAPCD will assure ongoing **accountability** for their respective programs

# NRCS' role

- Incorporate SIP elements into California's Field
  Office Technical Guide
  - CPS 372-Specifications, O&M, and Practice Requirements
- Field Office communication, training, and support
- Develop, populate and manage a stand-alone emissions database
- 1<sup>st</sup> report submitted to SJVAPCD on April 4, 2013
  - FY2009-12 completed contracts
  - 940 new engines installed
  - Working with EPA and SJVAPCD on determining the actual reductions



### NRCS & SJVAPCD Mobile Off-Road Ag Engines

San Joaquin Valley for FY2009-13 (as of October 2013)

^SJVAPCD co-funded 118 of the 295 engines for FY2009

\*Does not include the investments made by the participating producers

Fiscal Year	NRCS New Engines	NRCS Obligations (Millions)	SJVAPCD New Engines	SJVAPCD Obligations (Millions)	Total New Engines	Total Obligations *(Millions)	Projected NOx Reductions (tons/day)
2009	295	\$15.8	-	^\$2.1	295	\$17.9	1.49
2010	404	\$20.6	118	^0.6	522	\$21.2	2.49
2011	296	\$17.7	331	\$10.9	627	\$28.7	1.89
2012	321	\$17.6	513	\$16.7	834	\$21.8	1.99
2013	292	\$13.6	716	\$30.0	1,008	\$43.6	1.53
Total	1,318	\$85.3	1,678	\$60.3	3,286	\$133.2	9.39

### **Recent Developments**

- SJVAPCD Rule 9610 (State Implementation Plan Credit for Emission Reductions Generated through Incentive Programs) was adopted June 20, 2013
  - Administrative process through which several incentivebased emission reductions can receive federal SIP credit
  - Includes the mechanism for NRCS to submit annual emissions reports to the SJVAPCD
- ARB Resolution 13-24, adopted on October 25, 2013
  - Provides ARB with the administrative mechanism for incentive-based emission reductions from mobile off-road agricultural equipment to receive SIP credit.
  - Incentive-based emission reductions to be applied toward the 2007 ARB SIP commitment.

# What's Next for NRCS in CA?







- Continued collaboration with EPA, ARB, SJVAPCD, and our partners
- Data collection, entry and management
- Updates to CPS-372 documents and the Field Office Technical Guide
- Annual reporting from participants
- Annual reporting to SJVAPCD
- Emissions data for EPA approval
- Training for and support of NRCS field office staff

### **Questions?**

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#### www.ca.nrcs.usda.gov/programs/airquality/airquality.html

