

# Review of the **Emission Reduction Credit System** in the San Joaquin Valley Air Pollution Control District

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Enforcement Division  
California Air Resources Board  
September 10, 2019



# Reason for Program Review

- In January of this year, the CARB Board directed staff to conduct this review and report back to the Board in September
- This is a progress report to update you on where we are on that review

# Scope of Review

- CARB staff will review the ERC System, including the equivalency determination, and explain that in the context of the broader District program for reducing emissions from stationary sources including New Source Review, permitting, and regulatory requirements
- Objectively evaluate whether program is meeting legal requirements
- Determine if there are any ways the system might be improved

# Agenda

- Introduction to Stationary Sources
- Program Review Outline
- Part 1 - ERC Program Explanation
- Part 2 – ERC Banking Actions
- Part 3 – Federal Offset Equivalency
- Part 4 – Offsets in Permitting
- Next Steps

# Regulation of Stationary Sources

- Stationary sources are subject to Federal, State, and local regulations
- These regulations are enforced by permits, which specify operating conditions for each individual emissions source
- New Source Review is the primary regulation for permitting

# New Source Review

- New Source Review (NSR) is specified in Federal and State law and local regulation
- Any new or modified source which seeks to emit above a specified threshold, must:
  - Apply Best Available Control Technology (BACT)
  - Offset emission increases with an equivalent or better emissions decrease at either the same facility, or from another facility in the same air basin
    - Many of these decreases are in the form of Emission Reduction Credits (ERCs)

# Emission Reduction Credits

- ERCs are the currency of offsets
- ERCs represent real surplus emissions reductions, verified relative to legal criteria
- ERCs can be sold or traded in an open market
- The purchasing facility uses ERCs as an emissions decrease to offset emissions increases from their project
- ERC program is required by State and Federal law

# Value of ERCs

- **Time-of-issuance:** At the time an ERC is issued, it represents legally verified emissions reductions, which is value at “time-of-issuance”
- **Time-of-use:** As time passes, more regulations are adopted that would have required emissions reductions from the source before the ERCs are used, which leads to value at “time-of-use”
- **Time-of-use** value will always be **less than or equal** to the **time-of-issuance** value



# ERC Value

- US EPA requires ERCs to be valued at time-of-use
  - US EPA allows a local NSR program to differ from federal NSR provided the local program is at least as stringent
- SJVAPCD regulations value ERCs at time-of-issuance
- There are also other differences between Federal and District offsetting requirements
- EPA allows the District to demonstrate equivalency between the two methods, which is codified in the District NSR rule

# Equivalency

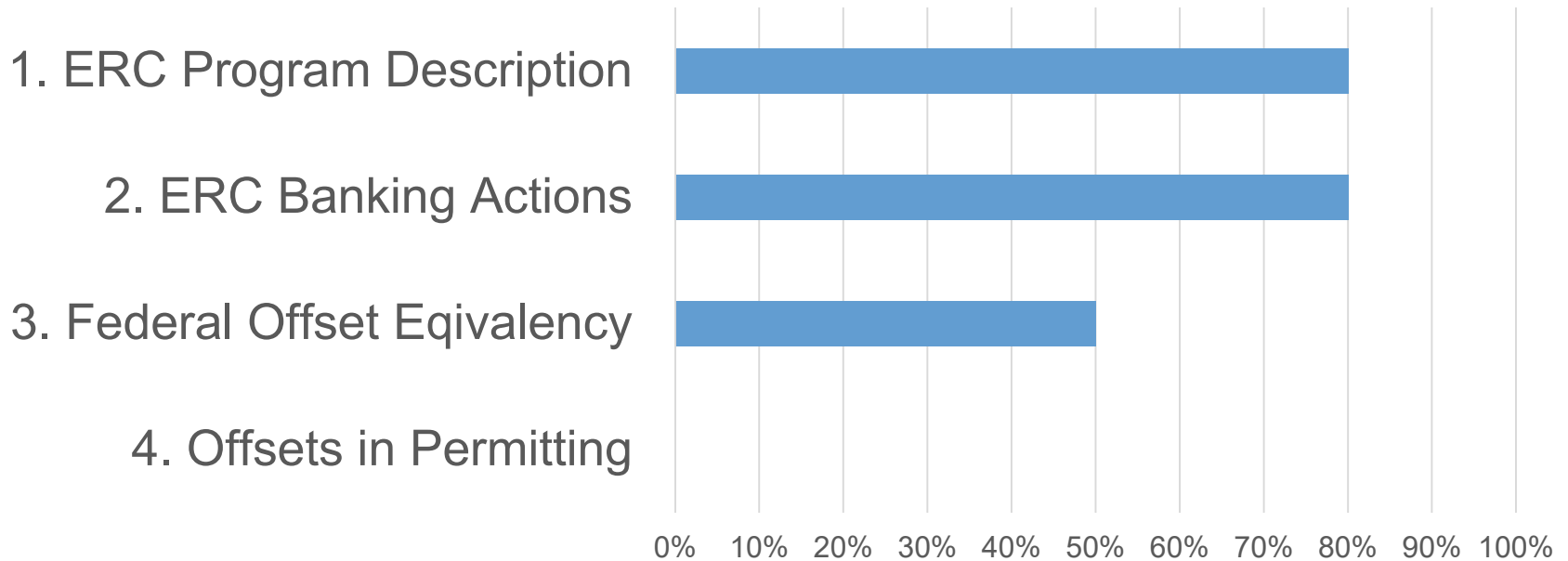
- The District has always been able to demonstrate equivalency
- Equivalency is demonstrated by comparing:
  - 1) Federal offset quantities versus District offset quantities (valued at time-of-issuance)
  - 2) Federal offset quantities versus District offset quantities and other emission reductions (valued at time-of-use)
    - Other emissions reductions may include orphan shutdowns, ERCs surrendered for mitigation under CEQA, BACT on existing minor sources, and the 10% AQID discount on new ERCs issued

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# Program Review Outline

## % Work Completed



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# Review Element 1: ERC Program

- Explain the basis for the regulations which result in the requirement for an ERC program
- Provide background and historical information on the SJV ERC program
- Explain the basis for, and function, of the ERC program
- Give context to how the ERC program piece fits into the NSR program in whole

# Review Element 1: ERC Program Review

- This is a program review
- The program review will ensure the program is being run in accordance with legal requirements
- The program review will look for opportunities for improvement by reviewing implementation of the rules and programs, and evaluating the degree to which the program is sufficiently effective to achieve and maintain ambient air quality standards, consistent with statutory obligations

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# Review Element 2: ERC Banking Actions Review Purpose

- Purpose: to evaluate a sample of ERC banking actions to assess consistency with District Rules and State and Federal law and generally accepted ERC banking criteria

# Review Element 2: ERC Banking Actions Selection Criteria

- All ERCs contained in the Earthworks report were selected initially
- The remaining ERCs were selected randomly, based on the following criteria:
  - A variety of industries
  - Varied regions within the District
  - Magnitude of emissions banked
  - Range of dates of banking action

# Review Element 2: ERC Banking Actions Selection

- A total of 52 original banking actions were selected for review
- Selections were chosen from a list of active ERCs within the current District ERC bank
- List did not contain company names as an identifier
- Number of banking actions represents a statistically valid sample size of the current ERC bank

# Review Element 2: ERC Banking Actions Review Process

- CARB staff reviewed each ERC against the District rules that were in effect at the time the application was submitted
- Previous versions of District rules were obtained, including those from individual county Districts, pre-unification
- CARB made information requests to the District for files on each ERC project number
- Each project was evaluated based on the information provided by the District from the information request
- If more information was needed, staff then searched the District's PAS database independently

# Review Element 2: ERC Banking Actions Review Criteria

- Each banking action was evaluated for the five legal criteria:
  - **Real** – actual emissions, not potential
  - **Quantifiable** – measurable, calculable
  - **Surplus** – beyond what is required by regulation
  - **Permanent** – emissions are not returning without going through New Source Review
  - **Enforceable** – legally binding
- Also evaluated were application timeliness and the emissions baseline period used

# Review Element 2: ERC Banking Actions Review Details

- CARB staff went through the District's documentation to check each item of the engineering evaluation against the rules and policies in place for that time
- Calculations and determinations were checked and/or recreated
- CARB staff review looking for areas where the District evaluation either met or did not meet legal requirements, areas where the District was very strong, as well as areas where improvement could be made
- The results of these reviews are currently being summarized

# Review Element 2: ERC Banking District Application Review

## San Joaquin Valley Air Pollution Control District ERC Application Review Shutdown of Two Internal Combustion Engines

Facility Name: [REDACTED] Date: August 10, 2015  
 Mailing Address: [REDACTED] Engineer: [REDACTED]  
 [REDACTED] Lead Engineer: [REDACTED]  
 Contact Person: [REDACTED]  
 Facility ID: C-2885  
 Project #: C-1130364  
 Submitted: February 15, 2013  
 Deemed Complete: January 16, 2014

### I. Summary

The primary business of [REDACTED] is the production of oil and natural gas.

[REDACTED] has shutdown Coalinga Engines C-2885-49 and -53, on 4/11/12 and 8/5/11, respectively. The operating permits have been surrendered.

[REDACTED] proposes to bank the emission reductions for criteria pollutants (NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub> and VOC) and greenhouse gasses (GHG) (CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O). The natural gas-fired IC engines were used to power natural gas compressors. The following emission reductions qualify for banking. See the operating permits in Appendix A.

Bankable Criteria ERCs (lb/quarter) ERC C-1372					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
1st Quarter	27	1	26	1,473	14
2nd Quarter	70	2	61	3,471	36
3rd Quarter	23	1	29	1,533	12
4th Quarter	17	0	9	586	9

Bankable GHG ERCs (metric tons/year)	
GHG	161

### II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)  
 Rule 2301 Emission Reduction Credit Banking (1/19/12)  
 Rule 4201 Particulate Matter Concentration (12/17/92)  
 Rule 4701 Internal Combustion Engines - Phase 1 (8/21/03)  
 Rule 4702 Internal Combustion Engines (8/18/11)



# Review Element 2: ERC Banking Location and Description

## III. Location of Reduction

The engines were located in the Coalinga Nose Unit in the Coalinga Oilfield in Fresno County, Section 7, Township 20S, Range 16E, near Coalinga, CA.

## IV. Method of Generating Reductions

The method of emission reductions is the permanent shut down of two natural-gas fired compressor engines, permits C-2885-49 and -53. The engines ceased operating on 8/6/11 and 4/11/12, and the permits were cancelled on 8/27/12. The shutdown of these engines followed the shutdown of engine C-2885-57. All three of the compressor engines have been removed from the site and no other engines or electric motors are being used to compress the gas.

Chevron had banked ERCs from the first of the three engines (C-2885-57) during project C-1111565. According to the applicant, the Coalinga Nose Unit gas production has declined and can no longer produce gas.



# Review Element 2: ERC Banking Emission Factors

## B. Emission Factors

District Rule 2201, defines “actual emissions” as follows:

*Actual Emissions: emissions having occurred from a source, based on source test or monitoring data, actual fuel consumption, and process data. If source test or monitoring data is not available, other appropriate, APCO-approved, emission factors may be used.*

The applicant has provided source test data for NO<sub>x</sub>, SO<sub>x</sub>, CO and VOC, which are all lower than the permitted emission factors for each engine.

Since the engines had not been tested for PM<sub>10</sub> emissions, the District must consider using the permitted emission factor of 0.064 g/hp-hr. In order to determine if that number is accurate, it has been compared to the emission factor in EPA AP-42, Table 3.2-3, which is 0.01941 lb/MMBtu. According to the following calculation, the numbers are the same.

$$\frac{0.064 \text{ g} \cdot \text{PM}_{10}}{\text{hp} \cdot \text{hr}} \times \frac{1 \text{ lb}}{453.6 \text{ g}} \times \frac{\text{hp} \cdot \text{hr}}{2,546.5 \text{ Btu}} \times \frac{0.35\% \text{ hp}_{out}}{\text{hp}_{in}} \times \frac{1,000,000}{\text{MM}} = 0.0194 \frac{\text{lb} \cdot \text{PM}_{10}}{\text{MMBtu}}$$

Since the AP-42 emission factor has been derived from the testing of many natural gas engines, it is considered to be accurate and shall be used in the proceeding calculation.



# Review Element 2: ERC Banking Baseline Period Determination

## C. Baseline Period Determination

Pursuant to Rule 2201, the Baseline Period is a period of time equal to either:

*The two consecutive years of operation immediately prior to the submission date of the Complete Application; or*

*At least two consecutive years within the five years immediately prior to the submission date of the Complete Application if determined by the APCO as more representative of normal source operation.*

Chevron has banked ERCs from the shutdown of the first engine in the Coalinga Nose Unit Compressor Station (C-2885-57) in Project C-1111565. In order to preclude any load-shifting, the District has determined that the same baseline period shall be used for this project. The baseline period is May, 2008 through April, 2010 (see project C-1111565).

# Review Element 2: ERC Banking Calculations

## E. Historical Actual Emissions (HAE)

The HAE for the engine are determined by multiplying the quarterly fuel-use by the emission factors presented above, as shown in the following tables.

### 1. C-2885-49

HAE from Fuel Use Quarter 1						
NO <sub>x</sub>	0.0382	lb/MMBtu x	690	MMBtu/qtr =	26	lb/qtr
SO <sub>x</sub>	0.0008	lb/MMBtu x	690	MMBtu/qtr =	1	lb/qtr
PM <sub>10</sub>	0.0194	lb/MMBtu x	690	MMBtu/qtr =	13	lb/qtr
CO	1.2605	lb/MMBtu x	690	MMBtu/qtr =	870	lb/qtr
VOC	0.0205	lb/MMBtu x	690	MMBtu/qtr =	14	lb/qtr

HAE from Fuel Use Quarter 2						
NO <sub>x</sub>	0.0382	lb/MMBtu x	1,770	MMBtu/qtr =	68	lb/qtr
SO <sub>x</sub>	0.0008	lb/MMBtu x	1,770	MMBtu/qtr =	1	lb/qtr
PM <sub>10</sub>	0.0194	lb/MMBtu x	1,770	MMBtu/qtr =	34	lb/qtr
CO	1.2605	lb/MMBtu x	1,770	MMBtu/qtr =	2,231	lb/qtr
VOC	0.0205	lb/MMBtu x	1,770	MMBtu/qtr =	36	lb/qtr

# Review Element 2: ERC Banking Criteria for Banking

## A. Real

The emissions reductions were generated by the shutdown of two engines. The emissions were calculated from historic fuel-use data and recognized emission factors and source test data, therefore the emissions were real. The engines have been removed. Therefore, the emission reductions are real.

## B. Enforceable

The associated permits for these units have been surrendered to the District, and the engines have been removed. Operation of the equipment without a valid permit would subject the permittee to enforcement action, and this facility is subject to annual inspections. Therefore, the reductions are enforceable.

## C. Quantifiable

The reductions are quantifiable since they were calculated from historic fuel use records, source testing data, established and accepted emission factors and methods according to District Rule 2201. Therefore, the reductions are quantifiable and have been quantified.

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# Review Element 3: Equivalency Report

## San Joaquin Valley APCD Annual Offset Equivalency Report

Summary for 08/20/2017 through 08/19/2018

Pollutant	(3) Number of New Major Sources	(4) Number of Federal Major Mods	(5) Offsets Required under Federal NSR*	(1) Offset Requirement Equivalency *				(2) Surplus at the Time of Use Equivalency*				
				(6) Offsets Required under District NSR	(7) Excess or Shortfall this Year	(8) Excess or Shortfall previous Year	(9) Total Excess or Shortfall	(10) Shortfall from Previous Year	(11) Reduction (surplus at the time of use) used for equivalency this year	(12) Shortfall this year	(13) Reductions eliminated by discounting at the time of use**	(14) Unused Carry-over Creditable Reductions
NOx	0	11	119.3	40.7	-78.6	4356.1	4277.5	0.0	119.3	0.0	5485.3	434.0
VOC	1	28	625.9	157.8	-468.1	1124.2	656.1	0.0	625.9	0.0	2263.8	1286.0
PM10	0	0	0.0	14.8	14.8	821.2	836.0	0.0	0.0	0.0	127.7	1854.0
PM2.5	0	0	0.0	0.0	0.0	370.9	370.9	0.0	0.0	0.0	0.0	991.0
CO	0	0	0.0	0.0	0.0	198.1	198.1	0.0	0.0	0.0	110.7	740.0
SOx	0	0	0.0	7.6	7.6	2856.0	2863.6	0.0	0.0	0.0	770.7	1987.0

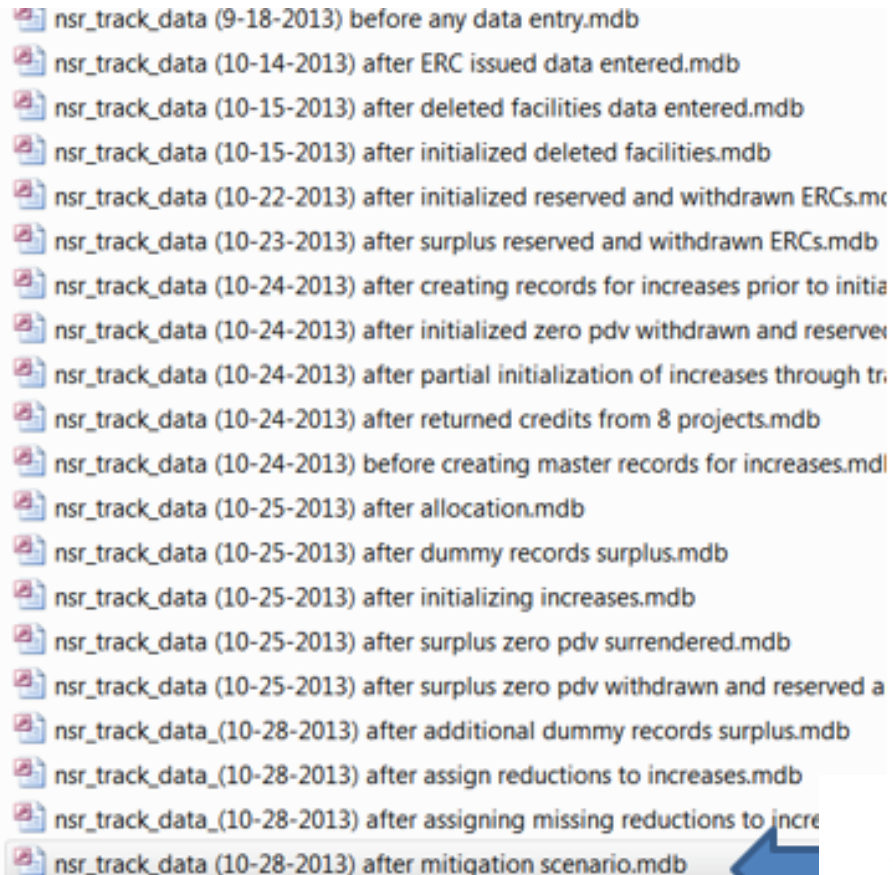
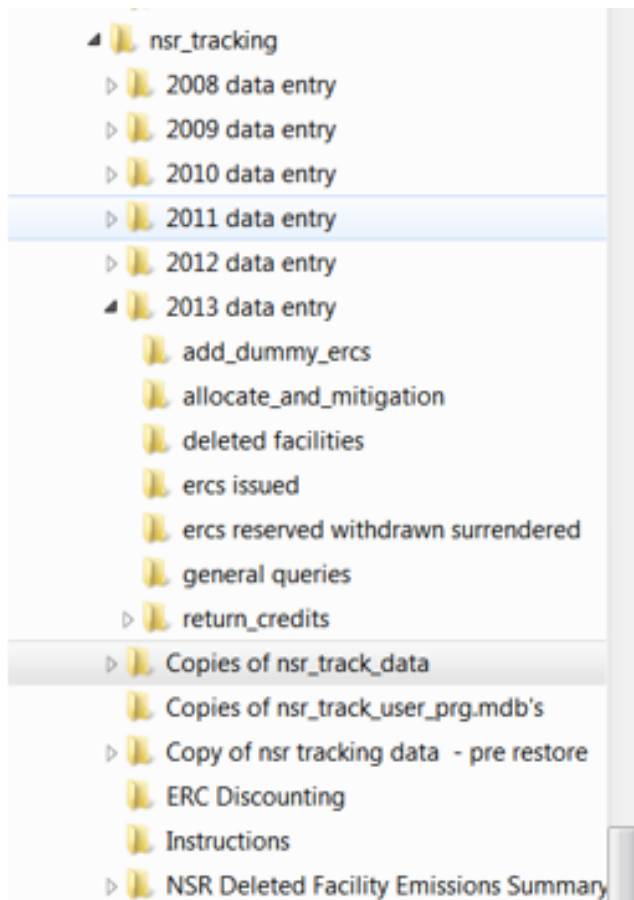
\* All numbers are in Tons per Year

\*\* Total quantity of discount since initiating tracking in August 2001

# Review Element 3: Equivalency Review

- CARB has met with the District many times to develop an understanding of the equivalency system
- CARB is reviewing the system as a whole, as well as each step of the process
- The District has provided CARB with access to the equivalency database and associated documentation
- CARB is reviewing the inputs to and outputs of the database, as well as the inner workings and side processes

# Review Element 3: Equivalency Database





# Review Element 3: Equivalency Detail

## San Joaquin Valley APCD Annual Offset Equivalency Report - Detail

Transaction details for 08/20/2017 through 08/19/2018

**Pollutant**    **Company Name and Address**

NOx

AERA ENERGY LLC  
HEAVY OIL WESTERN STATIONARY SOURCE,  
KERN COUNTY

**Surplus at the time of use Reductions Used to Mitigate this Increase**

Tracking ID for ATC	Fed Offsets Req'd	ATC Date	Tracking ID for Reduction	Credit (t/y)	Time of Use
2018-S-1171938-6943-0	0.400	11/15/2017	2010-S-1085134-4427-1	0.300	11/15/2017
2018-S-1171938-6943-0	0.100	11/15/2017	2019-S-1171326-6811-1	0.100	11/15/2017

**Total Reductions, this reporting period, for this project      0.4**

AGRI-WORLD COOPERATIVE  
31545 DONALD AVE, MADERA

**Surplus at the time of use Reductions Used to Mitigate this Increase**

Tracking ID for ATC	Fed Offsets Req'd	ATC Date	Tracking ID for Reduction	Credit (t/y)	Time of Use
2018-C-1172086-6952-0	3.500	07/03/2018	2010-C-1093286-4484-1	0.200	07/03/2018
2018-C-1172086-6952-0	3.300	07/03/2018	2010-S-1085134-4370-1	0.100	07/03/2018
2018-C-1172086-6952-0	3.200	07/03/2018	2017-S-1114928-6476-1	1.355	07/03/2018
2018-C-1172086-6952-0	1.845	07/03/2018	2010-S-1084594-4390-1	0.200	07/03/2018
2018-C-1172086-6952-0	1.645	07/03/2018	2016-S-1143483-6463-1	1.645	07/03/2018
2018-C-1172088-6953-0	3.500	07/03/2018	2010-S-1085102-4424-1	0.100	07/03/2018
2018-C-1172088-6953-0	3.400	07/03/2018	2010-C-1093286-4484-1	3.400	07/03/2018
2018-C-1172089-6954-0	0.300	07/03/2018	2010-S-1085102-4424-1	0.300	07/03/2018

**Total Reductions, this reporting period, for this project      7.3**

E&B NATURAL RESOURCES MGMT  
HEAVY OIL CENTRAL



# Review Element 3: Equivalency Orphan Shutdown Data Request

- Orphan Shutdowns (unclaimed actual emission reductions from shutdown of facilities) can be used for District equivalency in accordance with the District NSR rule.

2013-S-999204-5386-1

2004-S-999252-1439-1

2010-C-999263-4278-1

2015-N-999290-6076-1

2018-C-999445-6878-1

2016-S-999494-6077-1

2013-C-999512-5391-1

2018-C-999547-6880-1

2010-C-999583-4282-1

2017-C-999646-6593-1

# Review Element 3: Equivalency Special Project Data Request

- Third party electrification projects can be used for District equivalency purposes, and are used in accordance with the District NSR rule.

2008-C-8881829-3637-1

2008-C-8881849-2970-1

2008-S-8881233-3127-1

2008-S-8881262-3137-1

2008-C-8881812-3628-1

2008-C-8881812-3630-1

2008-C-8881812-3632-1

2008-C-8881812-3631-1

2008-C-8881813-2967-1

2008-C-8881814-3634-1

2008-C-8881825-3635-1

2008-C-8881829-3636-1

2008-C-8881892-3676-1

2008-C-8881892-3673-1

2008-C-8881892-3678-1

2008-C-8881896-2980-1

2008-C-8881896-2981-1

2008-C-8881887-3672-1

2008-C-8881896-2982-1

2008-C-8881881-3667-1

2008-C-8881896-2983-1

2008-C-8881878-3661-1

2008-C-8881896-2984-1

2008-C-8881901-2908-1

2008-C-8881949-3695-1

2008-C-8881878-3660-1

2008-C-8881950-3696-1

2008-C-8881878-3659-1

2008-C-8881962-3697-1

2008-C-8881878-3658-1

2008-C-8881971-2995-1

2008-C-8881971-2996-1

2008-C-8881971-2997-1

2008-C-8881877-3657-1

2008-C-8881971-2998-1

2008-C-8881971-2999-1

2008-C-8881972-3000-1

2008-C-8881972-3001-1

2008-C-8881972-3002-1

2008-C-8881972-3003-1

2008-C-8881972-3004-1

2008-S-8881142-3089-1

2008-S-8881145-3090-1

2008-C-8881892-3674-1

# Review Element 3: Equivalency Information Requests

- CARB is reviewing each type of reduction used in equivalency, including ERCs, orphan shutdowns, and special reduction projects
- CARB continues to submit information requests regarding equivalency and has ongoing meetings with the District to ensure we develop a full understanding of the system

# Review Element 3: Equivalency System Comparison

- A comparison of the SJV equivalency program to other air districts' equivalency programs will be discussed in the final report
  - Bay Area AQMD
  - Ventura County APCD
  - South Coast AQMD

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# Review Element 4: Offsets in Permitting Purpose

- This element not yet started, still in planning process
- Purpose is to review the ERC program as it relates to the air permitting program as a whole, under the requirements of NSR
- Focus is on how and when offsets are required in specific NSR actions and includes reviewing actions where offsets were not required

# Review Element 4: Offsets in Permitting Selection Plan

- Staff are working on a process to select the specific facilities and/or projects to be reviewed
- Selection plan:
  - Choose several of the District's larger facilities and look at permitting actions over time
  - For the remainder of facilities/projects, select randomly based on similar factors used in selecting ERC projects:
    - Varied based on type of industry, magnitude of emissions, region within the District, and time period



# Review Element 4: Offsets in Permitting Project Selection

- Staff is planning to review permitting projects where:
  - **Offsets are not required**
    - NSR does not apply
    - Project does not cause an emission increase
      - Calculation methodology for determining an increase
      - Facility-wide caps
      - Netting
    - Offset threshold(s) not exceeded
    - Offset exemptions
  - **Offsets are required**
    - Emission increase & offset threshold exceeded
    - Mitigation triggered by modeling

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# Observations

- More than 80% of the NO<sub>x</sub> ERCs in the SJV bank are more than 20 years old
- The District estimated in 2016 that the time-of-use values were worth about 18% of time-of-issuance
- Since 2010, the majority of NO<sub>x</sub> and VOC emission reductions used to show equivalency come from orphan shutdowns and third party electrification projects

# Integrating Public Comments

- Our work plan is flexible
  - We may make adjustments based on stakeholder comments
- We are interested in comments from stakeholders and the public

# Public Process - Calendar

- April 30, 2019 – Initial public meeting
- September 10, 2019 – Progress update
- Public Outreach
  - Workshops
  - Conf. calls, in person meetings, etc.
  - Suggestions?

# Public Process Goals

- We will be as open and transparent as possible
  - Our website contains:
    - Historical documents relevant to the review:  
<https://ww2.arb.ca.gov/our-work/programs/san-joaquin-valley-emission-reduction-credit-program-review>
    - Documents related to this review, including our staff reports.
    - All information received by the District on the ERC reviews is posted to the web site
- We want stakeholder input
  - Upcoming public meetings
  - Discussions with individual stakeholders

# Public Process – Website Documents



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## San Joaquin Valley ERC Program Review Public Documents

### San Joaquin Valley Emission Reduction Credit Program Review

[About](#)

[Project Timeline](#)

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[Public Meetings](#)

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#### San Joaquin Valley Emission Reduction Credit Review Update Report

[SJV ERC Review Update Report \(9-5-19\)](#)

#### Letter from CVAQC requesting CARB review of San Joaquin Valley's ERC system.

[Central Valley Air Quality Coalition's petition to CARB Chair Nichols \(1-9-19\)](#)

#### Report contains an analysis of specific original ERC banking actions. [\(external link\)](#)

[Earthworks' report on San Joaquin Valley Air Pollution Control District's emissions reduction credit \(ERC\) banking actions \(10-31-18\)](#)



# Public Process – Website Files

## San Joaquin Valley ERC Project Files

### San Joaquin Valley Emission Reduction Credit Program Review

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[Project Timeline](#)

[Public Documents](#)

[Public Meetings](#)

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The table below is a list of San Joaquin Valley APCD (District) Emission Reduction Credit (ERC) banking projects reviewed by CARB staff. Each project number links to a single file that contains the project documents in the public record the District provided to CARB staff. The project documents include the ERC banking application, the District's evaluation of application, the original ERC certificates issued, correspondence, as well as miscellaneous other documents pertinent to the project. The file does not contain any documents created by CARB staff that are part of the current and ongoing ERC program review. The multiple documents under each project were combined into a single document to facilitate access from this web site. The documents within the single file are ordered according to an identification number assigned by the District's electronic data management system. This order may not correspond to the dates the documents were generated or to any pattern that is the same from project to project. Some of the files are large and will take time to download. If you have any questions related to accessing the files or finding information within the files, please contact CARB staff by [email](#) or at [\(916\) 229-0349](tel:9162290349).

ERC Project #	Facility	Source of emissions reductions
<a href="#">C-1010009</a>	Anderson Clayton Corp.	Shutdown of vegetable oil mill
<a href="#">C-1011235</a>	Valley Air Conditioning	Replacement of diesel ag pumps with electric motor
<a href="#">C-1032163</a>	Britz Ag Finance Company, Inc	Shutdown of cotton gin
<a href="#">C-1040561</a>	Westside Farmers Coop	Shutdown of cotton gin
<a href="#">C-1063777</a>	Eagle Valley Ginning	Shutdown of cotton gin
<a href="#">C-1120248</a>	Hanford LP	Shutdown of power plant (pet coke boiler)



# Next Steps

- Collect and consider public comments
- Continue the evaluation
- Meet with stakeholders as requested
- Finalize review and findings/recommendations
- Public workshop in early spring 2020
- Full report to Board in spring 2020

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