



July 12, 2005

Ms. Linda Fiack
Deputy Director, Parks & Natural Resources
County of Yolo, Planning & Public Works Department
292 West Beamer Street
Woodlimd, CA 95695

Re Aggregate mining requirements

Dear Ms. Fiack:

The Yolo-Solano Air Quality Management District (District) received your request for guidance concerning any new or revised environmental circumstances or regulations that have occurred since 1996 that would affect aggregate mining facilities that are covered by the Yolo County Cache Creek Area Plan (CCAP) which was approved in 1996.

The largest areas of concerns for the District related to these facilities include the Nitrogen Oxide (NOx) emissions because of its' contribution to ground level ozone and the particulate matter (PM) emissions, both from the fugitive dust and from diesel combustion because of the carcinogenic impact.

The District's primary authority for regulating air emissions is in regards to stationary sources, as opposed to mobile sources (vehicles and off-road equipment). All of the aggregate mining and related facilities are under Permit to Operate (PTO) with the District and all applicable District, State, and Federal rules and regulations are being enforced by the District. The following are regulations that have already changed or will likely change in the near future:

District rules already revised

Since 1996, the District has adopted or amended approximately 20 District Rules and Regulations. Of these revised rules, only one, Rule 2.32, STATIONARY INTERNAL COMBUSTION ENGINES directly impacted aggregate mining operations. This rule which establishes emission limits for NOx and Carbon Monoxide (CO) is applicable and enforceable by the District independent of the County taking any additional action through your Interim Permit Review.

2) District rules on the calendar to revise

Through our 2003 Triennial Assessment and Plan Update and SB656 proposed schedule, there are additional measures that will likely be considered by our Governing Board that would also affect aggregate mining facilities. A couple of the tentative proposals that would have a significant impact would be further revisions to lower the allowable emissions limits from engines (Rule 2.32, STATIONARY INTERNAL COMBUSTION ENGINES) and lowering the allowable visible emissions to 20 % opacity from the current limit of 40% opacity in Rule 2.3, RINGELMANN CHART. Again, these possible future changes would be done as prohibitory rules and regulations which would be directly applicable and enforceable by the District.

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