Message

From: Stoker, Michael B. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DCB64B4E7EDF48AABE8EF43996A4652E-STOKER, MIC]
Sent: 3/5/2019 9:50:38 PM
To: samir.sheikh@valleyair.org
Subject: FW: DERA Funding
Attachments: ATT00001.txt

Importance: High

Best regards,
Michael Stoker
Regional Administrator, Region 9, US-EPA
Ex. 6 Personal Privacy (PP)

From: Roger Isom <roger@ccgga.org>
Sent: Tuesday, February 5, 2019 8:34 PM
To: Stoker, Michael B. <stoker.michael@epa.gov>; Wheeler, Andrew <wheeler.andrew@epa.gov>
Cc: rcorey@arb.ca.gov; Kurt Karperos <kkarpero@arb.ca.gov>; samir.sheikh@valleyair.org; 'Todd DeYoung' <Todd.DeYoung@valleyair.org>; aaron.tarango@valleyair.org; Mayfield, Dana <mayfield.dana@epa.gov>; wherum.bill@epa.gov
Subject: DERA Funding
Importance: High

Dear Administrator Wheeler and Regional Administrator Stoker,

I would like to bring to your attention a critical matter affecting one of the most heavily impacted areas in the country from an air quality perspective, where Federal EPA could significantly help industry turn the page on air quality, but is hamstrung be EPA restrictions that make absolutely no sense. Specifically, the Western Agricultural Processors Association (WAPA) is partnering with the San Joaquin Valley Air Pollution Control District to submit an application for funding from the Diesel Emission Reduction Act to replace 24 old diesel fired yard trucks used at tree nut hullers and processors with 24 100% electric yard trucks. WAPA represents tree nut hullers and processors of almonds, pecans, pistachios and walnuts. \yard trucks are used at these facilities to shuttle trailers of nuts in and around the facility. Currently, there is not a single electric yard truck used in the industry due to the sheer cost of the equipment (estimated to be $360,000). Under the most stringent laws affecting trucks in the world, these trucks only have to be upgraded to Tier 4 final diesel engines and not until 2023. This innovative and groundbreaking project would take these old diesel-fired trucks and replace them with new zero emission electric trucks. In the worst air quality region in the country, this project goes beyond the most far reaching state implementation ever adopted, and would help the San Joaquin Valley Air Pollution Control District move that much closer to attainment; a goal we know EPA wants too.

Unfortunately, Federal EPA has a restriction in DERA that limits eligible trucks to model years 1996 through 2007. In our industry, we purchase old trucks that were previously used on a daily basis at the ports. Of the 24 trucks we are planning on replacing only one truck would be a model year (1997) that is eligible, making this project unacceptable. I don't believe the intent of DERA is to exclude old "legacy" trucks, and I don't believe that EPA would let a groundbreaking project like this slip through the cracks, and essentially endorse the continued emissions of these trucks for another five years. On the contrary, I fully believe EPA would want partner on exactly this type of project. This is the kind of project that gets to the very intent of those that created DERA and its purpose. With that in mind I want to implore EPA to help us figure this out and find a timely solution to this quandary. We simply cannot let this happen.

I look forward to hearing from you on how EPA, ARB, SJVAPCD and WAPA can go above and beyond and help this region achieve its air quality goals.

Sincerely,

Roger

Roger A. Isom
President/CEO

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