

## APPENDIX 5 – COMMENTS ON THE DRAFT REPORT AND RESPONSES

**Comment: A decrease of 0.902 tons per day in Ventura is not justified by any data [to support the method use fractions used in calculating the emissions]. These guesses are not conservative guesses. The lack of conservative methodology biases the result away from the SIP intent of protecting people from hazardous levels of ozone.**

Response: DPR acknowledges that some of the method use fractions are based on best professional judgment. However, the commenter provides no information that supports a change to the method use fractions. DPR uses the most accurate estimate of method use fractions to determine emissions. Using conservative estimates would be infeasible. Beginning in 2008, pesticide use reports will provide objective data to determine the method use fractions. However, the method use fractions for the base year will remain unchanged. The emission inventory will show an inaccurate decrease of emissions if conservative (high) estimates are used for the base year and more accurate estimates from pesticide use reports are used for 2008 and later. Since the SIP requires a percentage reduction of the base year, the emission inventory will likely show compliance with SIP goals, but in reality be an artifact of an inconsistent method of calculation. Whether DPR uses high or low estimates of the method use fractions has no bearing on actual levels of ozone.

**Comment: Propylene oxide has been removed from the inventory and sulfur emissions have been reduced to zero. Whether these two adjustments were applied to the base year is not explicitly stated. DPR should verify that the Air Quality Management Districts reporting system is capturing all reported propylene oxide use.**

Response: DPR adjusted the propylene oxide and sulfur emissions in all years, including the base year. DPR has clarified the report. DPR has determined that all propylene oxide emissions previously included in the emission inventory were due to industrial uses. The SIP specifies that DPR's inventory only include agricultural and structural uses. Other uses, such as industrial are not included. Whether air districts report propylene oxide uses is immaterial. However, DPR has verified that propylene oxide emissions are included the VOC inventories reported by the San Joaquin Valley Air Pollution Control District. Emissions from some, but not all sulfur products have been reduced to zero. Products containing sulfur as the sole active ingredient in a powder/dust formulation were set to zero. Sulfur products containing other organic active ingredients or formulated as liquids were not set to zero.

**Comment: The application method adjust factors (AMAFs) are inapplicable for the ozone season conditions.**

Response: DPR continues to believe that emissions measured from studies outside the ozone season are the most accurate estimate for emissions during the ozone season. DPR has required registrants conduct additional monitoring studies to verify these estimates.