

The policy requires that the compliance specialist be familiar with air issues associated with dairy operations so that he/she can determine whether the practices described in the FDECPs are appropriate, whether they are being implemented correctly, and whether modifications of the practices are necessary.

The Element includes **Policy DE 5.1i** as a mechanism to ensure that the net increase in exhaust emissions for each dairy development/redevelopment project would not exceed the SJVUAPCD threshold levels for PM<sub>10</sub> and other exhaust pollutants (i.e., ROG and NO<sub>x</sub>). The policy requires that, as part of the technical report to be submitted with each application to either establish a new dairy or expand an existing dairy, dairy applicants shall be required to estimate the anticipated net increase in ROG, NO<sub>x</sub>, and PM<sub>10</sub> emissions generated from anticipated dairy equipment and vehicular traffic compared to existing conditions and demonstrate that the net increase will not exceed the SJVUAPCD threshold limits for ROG, NO<sub>x</sub>, and PM<sub>10</sub>.

**Policies DE 3.1a, 5.1c, 6.2d, and 6.3a**, and other policies under **Goal DE 6** are relevant to ammonia emissions and the related potential for the formation of secondary PM<sub>2.5</sub> from cattle manure decomposition. Although **Policy DE 3.1a** specifically addresses ammonia emissions in the development of the countywide policy, **Policy DE 5.1c** requires the preparation of an MTMP that would be implemented to reduce air pollutant emissions from the manure, including ammonia. **Policy DE 4.1b.B** requires that the timing and method of application of manure and process water to land minimize unnecessary contact with air to minimize the release of ammonia into the atmosphere. **Policy DE 6.2d** requires that the County set standards for implementation of the OMP and MTMP and minimally requires that quality assurance/quality control be implemented and documented. In addition, **Policy DE 6.2e** requires that, when standard methods for testing air emissions become available, dairy owner/operators would be required to test for ROG, hydrogen sulfide, ammonia, and methane emissions (possible odor-related gases). Because of the current lack of available standard methods to monitor the effectiveness of the treatment technologies in reducing air pollutants (ROG, ammonia, hydrogen sulfide, and methane) and lack of regulatory standards, dairy operators can only provide VS removal efficiency level data of the selected treatment technology to the County to certify that the MTMP is being implemented as part of the monitoring program. **Policy DE 6.1b** requires that the Dairy Monitoring Office include a compliance specialist capable of technically reviewing monitoring programs required by the Element, including the OMP and MTMP. However, there is a current lack of available standards to determine the effectiveness of manure treatment technologies in reducing ROG, hydrogen sulfide, ammonia, and methane. An accurate method for quantifying the potential air pollutant emissions from treated manure is anticipated to be available following completion of USDA ARS research activities under the national programs.