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Seyed Sadredin Executive Director/ Air Pollution Control Officer

Northern Region Office 4800 Enterprise Way Modesto, CA 95356-8718 (209) 557-6400 FAX (209) 557-6475

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54

Southern Region Office 2700 M Street, Suite 275 Bakersfield, CA 93301-2373 (661) 326-6900 FAX (661) 326-6985 DATE:

December 20, 2007

TO:

SJVUAPCD Governing Board

FROM:

Seyed Sadredin, Executive Director/APCO

Project Coordinator: Dave Warner

RE:

RECEIVE AND FILE DISTRICT'S ANNUAL OFFSET EQUIVALENCY REPORT TO THE FEDERAL ENVIRONMENTAL PROTECTION

**AGENCY** 

### **RECOMMENDATION:**

Receive and file the District's annual offset equivalency report (attached), submitted to the federal Environmental Protection Agency (EPA) for the 12-month period from August 20, 2006 through August 19, 2007.

### **BACKGROUND:**

Under the District's New and Modified Source Review (NSR) Rule, new facilities and modifications to existing facilities that cause increases in emissions above certain levels are required to provide emission reduction credits as mitigation. Although the District's NSR rule, overall, is more stringent than the federal regulations, it does not exactly match the federal requirements in all respects. In particular, the District's NSR rule does not require discounting of ERCs at the time of use. Discounting is a process of reducing the value of ERCs by adjusting them for emissions reductions that have been required by newer rules adopted since the original ERC banking action.

After years of negotiation with EPA and stakeholders, the parties agreed to an offset equivalency system designed to assess overall equivalency with EPA regulations on an annual basis. The details of this equivalency system have been embodied in the District's NSR rule, Rule 2201, since December 19, 2002.

SJVUAPCD Governing Board
RECEIVE AND FILE DISTRICT'S ANNUAL OFFSET EQUIVALENCY REPORT TO
THE FEDERAL ENVIRONMENTAL PROTECTION AGENCY
December 20, 2007

### **DISCUSSION:**

To demonstrate equivalency with the federal NSR offsetting requirements, the annual offset equivalency report must demonstrate both of the following:

- 1. The District has required an equivalent or larger amount of offsets from new and modified stationary sources as would have been required under direct implementation of federal regulations; and
- 2. The amount of reductions required by the District from new and modified stationary sources, after discounting at the time of use, equals or exceeds the amount of ERCs required under federal regulations.

The concept of an equivalency demonstration is only possible because the District's NSR program is, in several ways, more stringent than the federal requirements. Under federal NSR, offsets are only required for new major sources and major modifications to existing sources. For instance, for nitrogen oxides (NOx) and volatile organic compounds (VOC), the federal offsetting requirements would have been triggered at facility emission levels of 25 tons per year. In contrast, the District's NSR rule, as mandated by the California Clean Air Act, requires offsets for facilities emitting 10 tons per year of NOx or VOC. In addition to requiring offsets from smaller sources, the District's program is more stringent than the federal program in other ways, allowing for further credits towards the equivalency demonstration. Additional reductions that go beyond federal requirements and are therefore used by the District to show equivalency include the following:

- Higher offset ratios
- Extra discounting of credits at the time of banking
- Reductions from application of BACT to existing minor sources
- "Orphan" shutdowns (reductions from facility shutdowns for which ERCs are not granted to the owner)

During this reporting period, there were four projects that constituted either new major sources or federal major modifications. As shown in the attached report, reductions required by the District exceed the amount required under the federal regulations.

Although equivalency was shown for this reporting period, future equivalency demonstrations will be more difficult due to the flowing:

• Permit actions in the next tracking year that trigger major modifications for all criteria pollutants.

SJVUAPCD Governing Board RECEIVE AND FILE DISTRICT'S ANNUAL OFFSET EQUIVALENCY REPORT TO THE FEDERAL ENVIRONMENTAL PROTECTION AGENCY December 20, 2007

- Continued development of additional pollution-reducing "prohibitory" rules by the District will limit the quantity of surplus reductions available for the equivalency demonstration.
- Development of a New Source Review Rule to incorporate "extreme" ozone non-attainment requirements will create more major sources and more major modifications, and will require a greater quantity of surplus reductions for a successful equivalency demonstration.

In pursuit of solutions to the potential shortfall in our equivalency tracking system, District staff and the California Air Pollution Control Officers Association (CAPCOA) will be working with ERC owners and other stakeholders during the next tracking year.

Attachment: Offset Equivalency Report to EPA (7 pages)



November 19, 2007

Deborah Jordan, Director Air Division U.S. EPA, Region IX 75 Hawthorne Street San Francisco, CA 94105-3901

Re: Offset Equivalency Report

Dear Ms. Jordan:

As required by the District's New Source Review Rule, the District has completed an annual offset equivalency report for the twelve-month period from August 20, 2006 to August 19, 2007. The attached report incorporates the following:

- The quantity of offsets that would have been required from new major sources and federal major modifications to existing sources under a federal NSR program.
- The quantity of offsets actually required by the District.
- The surplus-at-time-of-use value of the emission reductions used to offset emissions increases from stationary sources.
- The quantity of shortfall or excess carry-over credits.

As you can see from the attached report, the District required more offsets than would have been required under federal offset requirements, and the surplus value of the reductions used exceeded those required under federal NSR. Therefore, equivalency is demonstrated and no remedial actions are necessary.

For your information, there are four projects of interest during this reporting period:

- Pastoria Energy Facility LLC
- Senéca Resources
- Ampersand Chowchilla Biomass LLC
- County Sanitation District of Los Angeles.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region 4800 Enterprise Wey Modesto, CA 95356-8718 Tel: (209) 557-6400 FAX: (209) 557-6475 Central Region (Main Office) 1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061 www.velleyeir.org Southern Region 2700 M Street, Suite 275 Bakersfield, CA 93301-2373 Tel: (661) 326-6900 FAX: (661) 326-6985 Ms. Jordan Page 2

The Pastoria Energy Facility LLC project was issued its final Determination of Compliance (DOC) by the California Energy Commission (CEC) in December 2006, during this reporting period. Permits for Seneca Resources, Ampersand Chowchilla Biomass LLC, and County Sanitation District of Los Angeles were all issued by the Air District during this reporting period. Therefore, these four projects are included in this report as trackable projects.

Please call me at (559) 230-5900 if you have any questions regarding this matter, or if you need additional details.

Sincerely,

**David Warner** 

**Director of Permit Services** 

cc: Mike Tollstrup, CARB

# San Joaquin Valley APCD Annual Offset Equivalency Report

Summary for 8/20/2006 through 8/19/2007

Offset Requirement Equivalency \*

Surplus at the Time of Use Equivalency\*

Pollutant	Number of New Major Sources	Federal Major	Offsets Required under Federal NSR*	Offsets Required under District NSR	or Shortfall	Excess or Shortfall previous Year	Total Excess or Shortfall		Shortfall from Previous Year	Reduction (surplus at the time of use) used for equivalency this year	Shortfall this year	Reductions eliminated by discounting at the time of use**	Unused Carry-over Creditable Reductions
NŌx	1 ·	1	182.9	332.6	149.7	2378.7	2528.4		0.0	182.9	0.0	2496.2	256.0
voc	1	0	90.0	274.2	184.2	767.7	951.9		0.0	90.0	0.0	464.9	1305.0
PM10	0	1	51,2	89.3	38.1	511.3	549.4		0.0	51.2	0.0	29.8	1105.0
СО	0	0	0.0	21.1	21.1	27.6	48.7	_•	0.0	0.0	0.0	0.0	63.0
SOx	0	. 1	143.2	80.6	-62.6	764.2	701.6		0.0	143.2	0.0	0.0	1013.0

<sup>\*</sup> All numbers are in Tons per Year

<sup>\*\*</sup> Total quanity of discount since initiating tracking in August 2001

# San Joaquin Valley APCD Annual Offset Equivalency Report - Detail

Transaction details for 8/20/2006 through 8/19/2007

Pollutant Company Name and Address

NOx

AMPERSAND CHOWCHILLA BIOMASS LLC 16457 AVENUE 24-1/2, CHOWCHILLA

### Surplus at the time of use Reductions Used to Mithate this increase

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Tracking ID for ATC	Fed Offsets Req'd	ATC Date	Tracking ID for Reduction	Credit (t/y)	Time of Use		
2007-C-1051449-2892-0	77.9	4/19 <i>/</i> 2007	2002-C-9990267-21-1	0.3	4/19/2007		
2007-C-1051449-2892-0	77.6	4/19/2007	2005-C-9993229-1215-1	0.1	4/19/2007		
2007-C-1051449-2892-0	77.5	4/19/2007	2005-C-9993666-1111-1	0.5	4/19/2007		
2007-C-1051449-2892-0	77.0	4/19/2007	2002-C-1010806-225-1	1.9	4/19/2007		
2007-C-1051449-2892-0	75.1	4/19/2007	2005-N-9994023-1130-1	. 0.7	4/19/2007		
2007-C-1051449-2892-0	. 74.5	4/19/2007	2005-C-9991305-1144-1	0.4	4/19/2007		
2007-C-1051449-2892-0	74.1	4/19/2007	2004-C-9991342-996-1	0.2	4/19/2007		
2007-C-1051449-2892-0	73.9	4/19/2007	2008-S-1070443-2586-1	0.1	4/19/2007		
2007-C-1051449-2892-0	73.7	4/19/2007	2005-N-9991631-1198-2	0.1	4/19/2007		
2007-C-1051449-2892-0	73.6	4/19/2007	2004-C-9993671-650-1	0.5	4/19/2007		
2007-C-1051449-2892-0	73.1	4/19/2007	2004-C-9991671-969-1	0.1	4/19/2007		
2007-C-1051449-2892-0	73.0	4/19/2007	2005-S-9993869-1214-1	, <b>0.2</b>	4/19/2007		
2007-C-1051449-2892-0	72.9	4/19/2007	2005-C-9993666-1111-3	0.2	4/19/2007		
2007-C-1051449-2892-0	72.7	4/19/2007	2005-S-9992826-1187-1	0.4	4/19/2007		
2007-C-1051449-2892-0	72.3	4/19/2007	2004-N-9993942-989-1	0.8	4/19/2007		
2007-C-1051449-2892-0	71.5	4/19/2007	2005-N-9991636-1189-2	0.4	4/19/2007		
2007-C-1051449-2892-0	71.1	4/19/2007	2005-N-9990517-1223-2	0.2	4/19/2007		
2007-C-1051449-2892-0	70.9	4/19/2007	2004-Ç-9990458-949-3	4.5	4/19/2007		
2007-C-1051449-2892-0	66.4	4/19/2007	2004-S-9993301-1003-1	0.3	4/19/2007		
2007-C-1051449-2892-0	66.1	4/19/2007	2008-C-9995709-2724-1	25.6	4/19/2007		
2007-C-1051449-2892-0	40.5	4/19/2007	2004-C-1031496-1281-1	0.1	4/19/2007		
2007-C-1051449-2892-0	40.4	4/19/2007	2008-N-9991107-2720-1	. 1,1	4/19/2007		
2007-C-1051449-2892-0	39.2	4/19/2007	2008-C-1063638-2541-1	0.1	4/19/2007		
2007-C-1051449-2892-0	39.1	4/19/2007	2008-C-1062730-2551-1	0.1	4/19/2007		
2007-C-1051449-2892-0	39.0	4/19/2007	2005-C-9994075-1038-1	0.3	4/19/2007		
2007-C-1051449-2892-0	38.7	4/19/2007	2007-S-1063768-2499-1	0.1	4/19/2007		
2007-C-1051449-2892-0	38.6	4/19/2007	2004-N-9991675-1005-1	0.5	4/19/2007		
2007-C-1051449-2892-0	38.0	4/19/2007	2008-S-1070443-2588-1	0.6	4/19/2007		
2007-C-1051449-2892-0	. 37.4	4/19/2007	2005-C-1030437-1296-1	1.0	4/19/2007		
2007-C-1051449-2892-0	36.4	4/19/2007	2003-N-9991284-324-1	1.5	4/19/2007		
2007-C-1051449-2892-0	34.9	4/19/2007	2004-N-9991823-606-1	0.5	4/19/2007		
2007-C-1051449-2892-0	34.4	4/19/2007	2008-S-1070443-2587-1	0.4	4/19/2007		

Pollutant Company Name and A	ddress				
2007-C-1051449-2892-0	34.0	4/19/2007	2005-S-9993700-1119-1	0.1	4/19/2007
2007-C-1051449-2892-0	33.9	4/19/2007	2005-S-9993111-1124-1	0.1	4/19/2007
2007-C-1051449-2892-0	33.8	4/19/2007	2004-N-1010750-1267-1	8.0	4/19/2007
2007-C-1051449-2892-0	25.8	4/19/2007	2004-C-1031496-1280-1	0.6	4/19/2007
2007-C-1051449-2892-0	. 25.2	4/19/2007	2004-N-1020473-1230-1	1.2	4/19/2007
2007-C-1051449-2892-0	24.0	4/19/2007	2006-N-1031512-1996-1	0.5	4/19/2007
2007-C-1051449-2892-0	23.5	4/19/2007	2002-N-9993921-95-1	0.2	4/19/2007
2007-C-1051449-2892-0	23.3	4/19/2007	2004-N-1011579-685-1	0.1	4/19/2007
2007-C-1051449-2892-0	23.2	4/19/2007	2007-C-9991862-2217-1	0.2	4/19/2007
2007-C-1051449-2892-0	23.0	4/19/2007	2003-N-999096-305-1	0.7	4/19/2007
2007-C-1051449-2892-0	22.3	4/19/2007	2005-S-1040705-1879-1	22.3	4/19/2007

Total Reductions, this reporting period, for this project **77.8** 

PASTORIA ENERGY FACILITY, LLC

ASTORIA ENERGY FACILITY, LLO
TEJON RANCH 30 MILES S OF BAKERSFIELD, AND
6.5 MILES E OF GRAPEVINE, RANCHO EL TEJON
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
2007-S-1052027-2890-0	105.0	12/1/2006	2007-S-9992936-2232-1	0.3	12/1/2006
2007-S-1052027-2890-0	104.7	12/1/2006	2007-N-9994879-2638-1	1.0	12/1/2006
2007-S-1052027-2890-0	103.7	12/1/2006	2004-S-1011383-781-1	5.4	12/1/2006
2007-S-1052027-2890-0	98.3	12/1/2006	2002-C-9990416-22-1	· 0.2	12/1/2006
2007-S-1052027-2890-0	98.1	12/1/2006	2008-S-9993129-2717-1	0.3	12/1/2006
2007-S-1052027-2890-0	97.8	12/1/2006	2008-S-1071703-2869-1	0.1	12/1/2006
2007-S-1052027-2890-0	97.7	12/1/2006	2007-C-1053057-1998-1	0.1	12/1/2006
2007-S-1052027-2890-0	97.6	12/1/2006	2008-S-9994144-2845-1	0.1	12/1/2006
2007-S-1052027-2890-0	97.5	12/1/2006	2008-C-1060836-2858-1	0.1	12/1/2006
2007-S-1052027-2890-0	97.4	12/1/2006	2005-S-1040705-1878-1	22.1	12/1/2006
2007-S-1052027-2890-0	75.3	12/1/2006	2006-N-1041192-1935-1	0.6	12/1/2006
2007-S-1052027-2890-0	. 74.7	12/1/2006	2005-S-9991749-1671-1	0.5	12/1/2006
2007-S-1052027-2890-0	74.1	12/1/2006	2007-S-1052797-2856-1	1.7	12/1/2006
2007-S-1052027-2890-0	72.4	12/1/2006	2007-S-1053191-2851-1	0.3	12/1/2006
2007-S-1052027-2890-0	72.1	12/1/2006	2005-N-1030479-1250-1	0.2	12/1/2006
2007-S-1052027-2890-0	71.9	12/1/2006	2008-N-1061788-2857-1	0.1	12/1/2006
2007-S-1052027-2890-0	71.8	12/1/2006	2004-N-1010312-1236-1	0.1	12/1/2006
2007-S-1052027-2890-0	71.7	12/1/2006	2004-N-1010750-1365-1	14.5	12/1/2006
2007-S-1052027-2890-0	57.2	12/1/2006	2004-S-1030941-1238-1	0.1	12/1/2006
2007-S-1052027-2890-0	57.1	12/1/2006	2003-S-1020795-1366-1	0.1	12/1/2006
2007-S-1052027-2890-0	57.0	12/1/2006	2005-S-1032528-1254-1	0.1	12/1/2006
2007-S-1052027-2890-0	56.9	12/1/2006	2004-C-9990682-1469-1	1.1	12/1/2006
2007-S-1052027-2890-0	55.8	12/1/2006	2005-C-9991340-1523-1	0.3	12/1/2006
2007-S-1052027-2890-0	. 55.5	12/1/2006	2004-C-9992915-1477-2	1.3	12/1/2006
2007-S-1052027-2890-0	54.2	12/1/2006	2004-C-9992915-1477-1	0.8	12/1/2006
2007-S-1052027-2890-0	53.5	12/1/2006	2005-C-1031264-1748-1	0.1	12/1/2006
2007-S-1052027-2890-0	53.4	12/1/2006	2005-C-1031265-1747-1	0.1	12/1/2006

Pollutant Company Name and I	\ddress 		<u> </u>		
2007-S-1052027-2890-0	53.3	12/1/2006	2005-C-1031266-1746-1	0.2	12/1/2006
2007-S-1052027-2890-0	53.1	12/1/2006	2005-C-1031263-1749-1	0.1	12/1/2006
2007-S-1052027-2890-0	53.0	12/1/2006	2005-S-1041220-1861-1	0.4	12/1/2006
2007-S-1052027-2890-0	52.6	12/1/2006	2005-N-1032011-1750-1	0.2	12/1/2006
2007-S-1052027-2890-0	52.4	12/1/2006	2004-N-1020472-1235-1	0.1	12/1/2006
2007-S-1052027-2890-0	52.3	12/1/2006	2004-C-1031042-1229-1	0.1	12/1/2006
2007-S-1052027-2890-0	52.2	12/1/2006	2002-C-1011235-226-1	1,1	12/1/2006
2007-S-1052027-2890-0	51.1	12/1/2006	2005-C-9992582-1522-1	0.1	12/1/2006
2007-S-1052027-2890-0	51.0	12/1/2006	2003-S-1020795-1356-1	0.3	12/1/2006
2007-S-1052027-2890-0	50.7	12/1/2006	2005-S-1040458-1893-1	13.9	12/1/2006
2007-S-1052027-2890-0	36.8	12/1/2006	2006-N-1011408-2898-1	36.8	12/1/2006
	Total R	eductions this	renorting period for this project	105	

# PM10

PASTORIA ENERGY FACILITY, LLC
TEJON RANCH 30 MILES S OF BAKERSFIELD, AND
6.5 MILES E OF GRAPEVINE, RANCHO EL TEJONIUS at the time of use Reductions Used to Mitigate this increase

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Tracking ID for ATC	Fed Offsets Req'd	ATC Date	Tracking ID for Reduction	Credit (t/y)	Time of Use
2007-S-1052027-2890-0	51.2	12/1/2006	2005-C-9990115-1155-1	. 0.4	12/1/2006
2007-S-1052027-2890-0	50.8	12/1/2006	2004-C-99908-967-1	0.7	12/1/2006
2007-S-1052027-2890-0	50.1	12/1/2006	2005-C-9993666-1111-1	0.2	12/1/2006
2007-S-1052027-2890-0	49.9	12/1/2006	2005-C-9993233-1070-1	0.2	12/1/2006
2007-S-1052027-2890-0	49.8	12/1/2006	2004-C-9992429-1030-1	3.2	12/1/2006
2007-S-1052027-2890-0	46.6	12/1/2006	2005-C-9993666-1111-2	3.0	12/1/2006
2007-S-1052027-2890-0	43.6	12/1/2006	2005-C-9994075-1038-1	0.1	12/1/2006
2007-S-1052027-2890-0	43.5	12/1/2006	2004-C-9992339-1020-1	0.2	12/1/2006
2007-S-1052027-2890-0	. 43.4	12/1/2006	2004-C-9991587-954-1	0.4	12/1/2006
2007-S-1052027-2890-0	42.9	12/1/2006	2005-N-9990807-1089-1	0.5	12/1/2006
2007-S-1052027-2890-0	42.4	12/1/2006	2004-C-9990639-951-1	4.1	12/1/2006
2007-S-1052027-2890-0	38.3	12/1/2006	2005-N-9990824-1126-2	6.7	12/1/2006
2007-S-1052027-2890-0	31.6	12/1/2006	2005-N-9990950-1165-1	0.1	12/1/2006
2007-S-1052027-2890-0	31.5	12/1/2006	2005-N-9991257-1098-1	3.9	12/1/2006
2007-S-1052027-2890-0	27.6	12/1/2006	2005-N-9991636-1189-1	1.9	12/1/2006
2007-S-1052027-2890-0	25:7	12/1/2006	2005-C-9990864-1084-3	0.3	12/1/2006
2007-S-1052027-2890-0	25.4	12/1/2006	2005-C-9991305-1144-1	0.2	12/1/2006
2007-S-1052027-2890-0	25.2	12/1/2006	2004-N-9992374-1014-1	0.8	12/1/2006
2007-S-1052027-2890-0	24.4	12/1/2006	2005-N-9992959-1150-1	0.6	12/1/2006
2007-S-1052027-2890-0	23.9	12/1/2006	2004-N-9991675-1005-1	. 0.2	12/1/2006
2007-S-1052027-2890-0	23.7	12/1/2006	2005-N-9993214-1097-1	0.3	12/1/2006
2007-S-1052027-2890-0	23.4	12/1/2006	2005-C-9990601-1195-1	0.3	12/1/2006
2007-S-1052027-2890-0	. 23.1	12/1/2006	2005-N-9993326-1199-1	0.4	12/1/2006
2007-S-1052027-2890-0	22.7	12/1/2006	2004-C-9990458-949-3	0.9	12/1/2006
2007-S-1052027-2890-0	21.8	12/1/2006	2004-N-9993440-990-1	0.2	12/1/2006
2007-S-1052027-2890-0	21.7	12/1/2006	2003-S-1011383-947-1	21.7	12/1/2006

Pollutant	Company	/ Name	and A	ddress
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### Total Reductions, this reporting period, for this project

51.2

SOx

**SENECA RESOURCES HEAVY OIL WESTERN** 

# 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
2006-S-1062358-2891-0	143.2	12/14/2006	2005-S-9993184-1037-1	0.5	12/14/2006
2006-S-1062358-2891-0	142.7	12/14/2006	2005-S-9993579-1204-1	0.1	12/14/2006
2006-S-1062358-2891-0	142.6	12/14/2006	2005-C-9994075-1038-1	0.1	12/14/2006
2006-S-1062358-2891-0	142.5	12/14/2006	2004-S-1032245-1299-1	1.3	12/14/2006
2006-S-1062358-2891-0	141.2	12/14/2006	2005-C-9990864-1084-3	0.1	12/14/2006
2006-S-1062358-2891-0	141.2	12/14/2006	2004-S-1032199-1275-1	0.2	12/14/2006
2006-S-1062358-2891-0	141.0	12/14/2006	2004-S-1020916-1270-1	4.3	12/14/2006
2006-S-1062358-2891-0	136.7	12/14/2006	2005-S-1032551-1287-1	57.3	12/14/2006
2006-S-1062358-2891-0	79.4	12/14/2006	2003-S-1011383-933-1	13.0	12/14/2006
2006-S-1062358-2891-0	66.4	12/14/2006	2005-S-1040778-1305-1	11.1	12/14/2006
2006-S-1062358-2891-0	55.3	12/14/2006	2003-S-1011383-934-1	13.0	12/14/2006
2006-S-1062358-2891-0	42.3	12/14/2006	2004-N-1010750-1268-1	38.7	12/14/2006
2006-S-1062358-2891-0	3.6	12/14/2006	2004-S-1020772-883-1	3.6	12/14/2006
	Totalil	Roductione th	ie ronartius seriad for thie series	rt 1/13.2	

iotal keauctions, this repartilly period, for this project

VOC

COUNTY SANITATION DISTRICTS OF L.A. CO. SECTION 35, TOWNSHIP 22S, RANGE 19E, MT.
DIABLO BASELINE AND MERIDIAN, KINGS COUNTY bills 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
2007-C-1043946-2893-0	90.0	7 <i>1</i> 24/2007	2008-C-1043946-2592-1	10.7	7/24/2007
2007-C-1043946-2893-0	79.3	7/24/2007	2008-C-1043946-2593-1	1.7	7/24/2007
2007-C-1043946-2893-0	77.6	7/24/2007	2008-C-1043946-2594-1	1.2	7/24/2007
2007-C-1043946-2893-0	76.4	7/24/2007	2008-C-1043946-2595-1	12.1	7/24/2007
2007-C-1043946-2893-0	64.3	7/24/2007	2008-C-1043946-2597-1	5.9	7/24/2007
2007-C-1043946-2893-0	58.4	7/24/2007	2008-C-1043946-2598-1	49.0	7/24/2007
2007-C-1043946-2893-0	9.4	7/24/2007	2008-C-1043946-2600-1	9.4	7/24/2007
	et on	•			