



The Cotton Chronicle

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www.ccgga.org

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Industry Calendar

July 10
Pima Matching—
Visalia, CA

August 30
Supima Annual
Meeting—
Coalinga, CA

September 12
Board Meeting—
Fresno, CA

Visit web calendar
for details

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Indoor Heat Illness – CalOSHA Won't Give Up

CalOSHA has released yet another draft of a potential heat illness prevention standard. In the latest version, CalOSHA has attempted to address some of the concerns. The proposed regulation now narrows the applicability of the requirements to the following industries:

- **Agriculture**
- **Commercial and institutional kitchens**
- **Commercial and institutional laundries**
- **Construction**
- **Manufacturing**
- **Mining oil and gas extraction**
- **Steam plants, geothermal plants, steam tunnels, boiler rooms**
- **Warehousing and storage**
- **Any indoor work area at 85°F when workers are present**
- **Any industry where workers' clothing restricts heat removal and temperature exceeds 80°F**
- **Any other setting identified in writing by the Division**

The latest draft of the regulation would exclude spaces where employees are already covered by the outdoor heat illness standard, and would also exclude spaces that use or generate water and have openings to the outdoors that allow the temperature in the space to be the same as or less than the outdoor temperature throughout the work shift. A new require-

ment in the latest draft would require employers to conduct an "assessment" of the environmental risk factors for heat illness when the temperature equals or exceeds 90°F. Control measures shall be instituted when the temperature equals or exceeds 90°F, or when employees wear clothing that restricts heat removal and the temperature equals or exceeds 80°F. The Association has remaining concerns and will be submitting comments. However, CalOSHA remains under the time limit established by SB 1167 to send a proposed regulation to the CalOSHA Standards Board by January 1, 2019.

Settlement Reached on PGE GRC

After almost two years of negotiation, a settlement was filed in the Pacific Gas & Electric (PG&E) Phase Two GRC. This wasn't your typical GRC, and with this settlement, the current rate structure as we know it will be completely changed. Eventually, the 15 or so rates agriculture is now subject to will be reduced to just three (3). The "peak period" will change as will the winter months, which were previously limited to November through April. However, many of these changes will be delayed in implementation. Back at the start of this effort, PG&E originally asked for a less than one percent average increase for agriculture while other parties were pushing for agricultural customers to get an increase between 3 and 15 percent, on top of the Phase One revenue requirement for all cus-



Welcome New Associate Members!

TAMA USA
Coldwell Solar

tomers. After months of intense negotiations, the Ag Energy Consumers Association (AECA), PG&E and other parties settled on a 0.7 percent increase for agriculture. That will be added to the Phase One increase of 5.5 percent in 2019 and 4.9 percent in 2020. In one of the most critical changes, also under discussion was a proposed shift in Time-Of-Use (TOU) periods. PG&E proposed to change the peak TOU period from 12:00PM-6:00PM to 5:00PM-10:00PM and eliminate weekend off-peak periods. Thanks to the efforts of AECA, we were able to secure a more reasonable peak period of 5:00PM-8:00PM and ensure that the TOU period shift will not occur until March of 2021. Also starting in 2021, weekends will have on-peak periods for the first time, but a new rate was created for those who need a prolonged off-peak period for irrigation. In addition, the winter months will be expanded, including making the critical month of October a winter month. The new rates will be made available to customers to transfer to on an optional basis starting no later than March of 2020. By the time all of the changes go into effect, customers will also be able to use PG&E's online tool to see how their bills might change under different scenarios. One of the main questions to arise out of the negotiations with the change in time-of-use periods, was what would happen to solar? Changing the peak hours away from the historically peak energy production during the middle of the day would definitely impact the payback to those investing in solar. As per the settlement, customers who have installed solar will be grandfathered on existing TOU periods for ten years after their interconnection date. It is important to note that this settlement has not yet been approved by the CPUC. It is hard to predict when it will be set for a vote, but it is expected to be approved by the end of 2018. ***AECA is an organization made up of growers, Ag associations, water agencies and irrigation districts, ranchers and food processors. California Cotton Ginners and Growers Association President/CEO Roger Isom is the current President of AECA.***

Final Compliance Date for Diesel Irrigation Pump Engines is Here!

For diesel-fired irrigation pump engines operating in the San Joaquin Valley, the jig is up! As of June 1, 2018, Tier 0, 1, and 2 engines are no longer able to operate legally in the San Joaquin Valley, unless they are less than 50 hp or operate less than 200 hours per year. San Joaquin Valley Air Pollution Control District (District) Rule 4702 (Internal

Combustion Engines) requires all non-emergency use Tier 1 and Tier 2, EPA certified diesel internal combustion (IC) engines rated greater than 50 horsepower to be removed from service by January 1, 2015, or 12 years after the installation date, but not later than June 1, 2018. In order to comply, you must do one of the following:

- 1. Replace the diesel engine with a new certified Tier 4 Final Engine**
- 2. Replace the diesel IC engine with an electric motor. Electric motors are exempt from District rules and regulations, including permit/registration requirements.**
- 3. Limit the number of hours of usage to no more than 200 hours per calendar year. If you currently have a permit for the engine, you will need to submit a permit modification application to officially lower the allowed operating hours. If you have a PEER for the engine or if your facility is not required to have Permits to Operate, notify the District in writing of your intent to operate the engine no more than 200 hours per year. You will be required to maintain usage logs demonstrating the engine operates no more than 200 hours per year.**

The Association would advise everyone to take these compliance dates seriously, as fines for failure to comply with previous compliance dates for Tier 0 engines have been in excess of \$100,000! Should you need assistance or have any questions, please don't hesitate to contact our office.

Cotton Research & Education Funding – Upcoming RFP

The California Cotton Ginners and Growers Association (CCGGA) as well as the California Cotton Industry Research Committee (CCIRC) will be sending a "Request for Proposals" (RFP) out in July seeking cotton industry research projects to be funded. The CCGGA Research & Education funding comes directly from growers thus each project is carefully considered by a group comprising of all segments in the industry. This year's research priorities are:

- **Diseases** (FOV resistance, variety screening, seed and soil treatments, pathology work in lab and field plus Seedling Disease issues)
- **Sticky Cotton** (Development of better detection and measurement system and standards and continue educational efforts)
- **Contamination** (Research ways to detect plastic in the seed cotton and eliminate where possible)
- **Insect Management and Control** (Efficacy screening of new and old products and promote intro of new chemistries with low VOC, focus on Lygus and Aphid control)
- **Water Management** (Regional with varying soil types and

irrigation methods with emphasis on efficiencies, conservation, nitrogen, and salt management)

- **Weed Management** (Resistance Management to existing products and introduction of new chemistries)
- **Nutrient Management** (Focus on nutrient management while taking into account factors of soil type, irrigation method, efficiencies, etc.)

Last year alone, CCGGA approved over \$200,000 in research dollars. Proposals will be due **Monday, August 27th** and will be reviewed by the CCIRC and CCGGA Tuesday, September 11th. If you would like to be included on the RFP mailing list please contact Jodi Raley at (559) 252-0684 or at jodi@ccgga.org.

CCGGA in Sacramento

The **California Cotton Ginners & Growers Association's (CCGGA) Director of Regulatory Affairs, Jodi Raley**, and **Western Agricultural Processors Association's Director of Food Safety, Priscilla Rodriguez**, spent two days in Sacramento meeting with legislators to discuss the increasing cost of doing business in California, specifically cotton producers and ginners. CCGGA prepared and distributed a graph depicting the fee increases experienced in 2018 alone due to regulatory or legislative action. These increases were from the Gas Tax, DMV fees, capital costs, minimum wage, health insurance, State Water Board fees, and more. The purpose of the meeting was to educate legislators on the full scope of fee increases the state is imposing and push back on actions that may cause additional increases primarily energy and utility rates. CCGGA met with several offices including **Senate Pro Tem Toni Atkins, Assemblymember Bigelow, Assemblymember Aguiar-Curry, Assemblymember Caballero, Assemblymember Mayes, Assemblymember Rubio, Assemblymember Arambula, Assemblymember Fong**, and more.

ARB Moves to Change PSIP Requirements for Trucks

The Air Resources Board held their monthly Governing Board meeting in Sacramento late last month, and one of the topics covered by ARB Staff was proposed changes to the Periodic Smoke Inspection Program (PSIP). For those that are unaware, a PSIP is an inspection on fleets that are comprised of Heavy Duty Diesel vehicles that must be conducted yearly. This requirement was included into the Truck and Bus Regulation that fleet owners must comply with every year, and PSIPs are a record keeper for the year in terms of vehicle information and annual miles traveled. PSIPs have become more important to fleets that are try-



Dr. Margaret Ellis, a CCGGA supported researcher at Fresno State.

ing to gain compliance with the Truck and Bus Rule, in that if a mileage reporting error is experienced, ARB will typically ask for a PSIP for that specific year to validate the miles traveled. ARB presented Proposed Amendments to the PSIP requirement, specific to changing acceptable opacity levels during these inspections, as well as requiring DPF-Installed vehicles to upgrade the installed equipment to zero or near-zero technology. The targeted opacity level for fleets with DPF filters is to be set at 5% opacity, whereas Non-DPF filtered fleets (like many ag fleets) is set at 20-40% depending on the model year and technology equipped. There was also the inclusion for a requirement that a PSIP must be conducted on a vehicle within 90 days of sale, as well as a recordkeeping requirement of 2 years for previously conducted PSIPs. Many Ag and Trucking Associations spoke in opposition to the Proposed Order, citing that the increase in paperwork for a rule that already requires a tremendous amount of recordkeeping, quite unnecessary, and many discussed that the increased cost is an unnecessary measure. While many spoke in opposition, the Governing Board moved forward with the Proposed Order as presented and the Order passed. Stay tuned for more updates on PSIP requirements.

APC Tours District 48 Focusing on Water

The **California Cotton Ginners & Growers Association** toured the District of **Assemblymember Blanca Rubio**, focusing primarily on water issues. Other members of the Agricultural President's Council were in attendance, including California Fresh Fruit Association, California Citrus Mutual, California Dairies Inc., California Agricultural Aircraft Association, Western Plant Health Association, California Rice Commission, California Strawberry Commission, and American Pistachio Growers. CCGGA was repre-

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sented by **Director of Technical Services Chris McGlothlin** and **Director of Regulatory Affairs Jodi Raley**. The group, accompanied by Assemblymember Rubio and her district staff, visited areas that play critical roles in the districts water supply and quality. Sites visited included Morris Dam, Santa Fe dam and the Baldwin Park operable unit. Issues discussed included a review of the flows in the Up-

ing water quality. The operators of the facilities throughout the tour expressed frustration with the rising cost of compliance of regulations including MS4 compliance (municipal storm sewer systems) of which is sometimes two to three times the amount of a city's operating budget. Additionally, the Assemblymember shared the burden

of ground water contamination that the San Gabriel River Watershed deals with. The Baldwin Park Operable Unit treats up to 11.2 million gallons per day through multiple treatment technologies to remove several pollutants to bring the water to a deliverable state. While the San Gabriel Valley and San Joaquin Valley are hundreds of miles apart, there were striking similarities in the frustrations shared and compliance hurdles operations are faced with. **Assemblymember Blanca Rubio** toured the San Joaquin Valley agricultural operations earlier this year, this exchange tour provides a valuable relationship in which we understand and have seen the issues that impact our membership or constituents the most. We look forward to building upon this relationship



per Area of the San Gabriel Watershed and some of the burdens the district faces with compliance and maintain-

and appreciate Assemblymember Rubio's willingness to further learn about the agricultural industry.