SHASTA COUNTY

DEPARTMENT OF RESOURCE MANAGEMENT
1855 Placer Street, Redding, CA 96001

Russ Mull, R.E.H.S., A.I.C.P.
Director
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March 25, 2004

Jorge L. Fernandez, P.E.
Chief, Program Evaluation Branch
California Air Resources Board
Stationary Source Division
P. O. Box 2815
Sacramento, California 95812

Dear Mr. Fernandez:

The Shasta County Air Quality Management District has received the December 2003 report entitled "A Focused Evaluation of the Shasta County AQMD Air Pollution Control Program" prepared by your office.

The District greatly appreciates the effort that you and your staff have put forth to assist us in improving our compliance programs. To assure that the improvements outlined in your evaluation are realized as quickly and efficiently as possible, the attached action plan is submitted for your review.

If you have any questions regarding this action plan, please contact District staff at (530) 225-5674.

Sincerely,

Russ Mull
Air Pollution Control Officer

RM/eg

Enclosure

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Action Plan

A Response to Recommendations of the
California Air Resources Board Report,
A Focused Evaluation of the Shasta County AQMD
Air Pollution Control Program

Prepared by the Shasta County Air Quality Management District
March 2004

ARB Recommendation	District Response	Completion Date
Field Inspection Program		
#1. The District should make it standard practice to issue violation notices in the field for routine-type violations.	Field violation notices will be developed for the following routine violations: 1. If facility stack opacity exceeds 40% for three minutes in any one hour where no malfunction report is received within four hours. 2. If wood fired energy facility stack opacity exceeds 40% for three minutes in any one hour after the 30-minute exempt period. 3. If an automobile coating facility is utilizing non-high efficiency gun or high VOC content coating. 4. If a dry cleaner is found with an untagged perc leak.	August 1, 2004
#2. Inspect all sources annually, including those categorized as "insignificant."	All dry cleaning operations will be inspected annually. Any other insignificant sources emitting toxic air contaminants will be inspected annually as staff resources allow.	September 1, 2004
#3. Conduct unannounced inspections of major sources.	The District will expand its policy of conducting unannounced inspections at major sources. The District may still contact major sources prior to an inspection to determine general availability of key environmental personnel.	August 1, 2004
#4. The District should follow-up with the Environmental Health Division to ensure that gasoline dispensing facilities inspections follow latest ARB guidelines.	The District will forward all updates of ARB guidelines for gasoline dispensing facility inspections to the Environmental Health Division.	Completed

ARB Recommendation	District Response	Completion Date
Legal Action Program		
#5. The District should update its Civil Penalty Policy Schedule to more adequately reflect penalty levels contained in H&SC 42400-42402.4.	The policy schedule will be updated as a draft for approval by the Air Pollution Control Board to include civil penalties as contained in the H&SC 42400-42402.4 (up to one million dollars).	September 30, 2004
#6. Violations based on illegal open burning should not be waived on a routine basis.	All violation settlements are made on a case-by-case basis. Outreach efforts to improve open burning compliance have included the addition of the daily burn status on the District and Burney Fire web pages as of July 2003. Additional efforts to distribute burn guidelines continue.	October 31, 2004
#7. The District should amend Rule 2:11 to make it consistent with Boiler Rule 3:26.	The District will propose to the Air Pollution Control Board that the emissions testing schedule in Rule 2:11 be considered as a minimum test frequency.	November 1, 2004
Complaints		
#8. Receipt and handling of complaints should be a high-priority item for the District.	The District will respond to complaints as they are received by staff. The District complaint policy was last revised in October 2003.	Complete.
#9. The District should develop written procedures to ensure that each complaint is logged, investigated, completed, and submitted to a supervisor for review.	The District currently has a written procedure. All efforts are made to investigate complaints within 24 hours of receipt by staff.	Complete.
#10. District should contact all complainants with results.	District written procedure will be revised to include this contact.	July 31, 2004

ARB Recommendation	District Response	Completion Date
Equipment Breakdown Program		
#11. The District should consider amending Rule 3:10 (Excess Emissions) at the earliest opportunity to include ARB's Model Breakdown Rule.	This rule is no longer part of the State Implementation Plan and can be revised. A suggested revision which includes provisions of the ARB Model Breakdown Rule will be presented for the consideration of the Air Pollution Control Board.	September 30, 2004
#12. The District should prepare written procedures and guidelines to ensure that breakdowns are handled uniformly from receipt of the breakdown report to final resolution.	Written procedures for the handling of upset/breakdown reports will be prepared. The upset/breakdown report will be revised.	August 31, 2004
#13. The District should conduct on-site investigations of reported breakdowns, unless the District inspector can clearly understand the situation over the phone or has encountered similar circumstances before.	Written procedures for the investigation of upset/breakdown reports will identify when site visits are required. Random upset follow-up visits may be implemented as staff time allows.	August 31, 2004
#14. When the District conducts an on-site inspection of a reported breakdown, the District should adequately document the on-site visit in a report that should contain detailed information.	An inspection form will be included in the written procedure for upset/breakdown follow-ups.	August 31, 2004
Variance Program		
#15. Written orders in the variance program must consistently address Health and Safety Code (H&SC) section 42352(2) as a two-part finding.	Additional detail in the variance findings will be presented regarding the petitioner's reasonable control of circumstances which would lead to unreasonable taking of property or the practical closing and elimination of a lawful business.	Next variance finding.

ARB Recommendation	District Response	Completion Date
#16. The District's variance petition and Rule 4:5 (Contents of Petitions) be modified in order to meet all ARB criteria for contents of applications (petitions).	The District's variance petition was modified on May 13, 2003, to include all ARB criteria. District Rule 4:5 will be revised to remove section 4:5.e.2 and to include all the ARB criteria for contents of applications and presented for consideration by the Air Pollution Control Board.	September 30, 2004
#17. The District should define procedures to ensure that all hearing notification requirements of the H&SC are met. The hearing board shall ensure that all orders are sent to the ARB within the time frame required by H&SC section 42360.	District procedures were revised on August 12, 2003, and this item is complete.	Completed.
#18. The District should write staff reports for all petitions that request variance relief for more than 30 days.	District procedures were revised on August 12, 2003.	Completed.
#19. When appropriate, the hearing board should impose conditions (interim limits) on the regulated pollutant or on the equipment with the goal of minimizing emissions from the source while on variance.	District procedures were revised on August 12, 2003, to include staff recommended restrictions, requirements, or conditions.	Completed.

Permit Quality

#20. The District should review permits at the time of annual renewal to ensure that permit conditions are adequate with respect to recordkeeping, enforceability, and clarity to ensure compliance with current rules.	The District will review all permits during renewal periods and revise conditions to improve recordkeeping, enforceability, and clarity.	Ongoing.