



Report on Imperial County Air Quality and Consideration of the Imperial County 2009 PM10 Plan

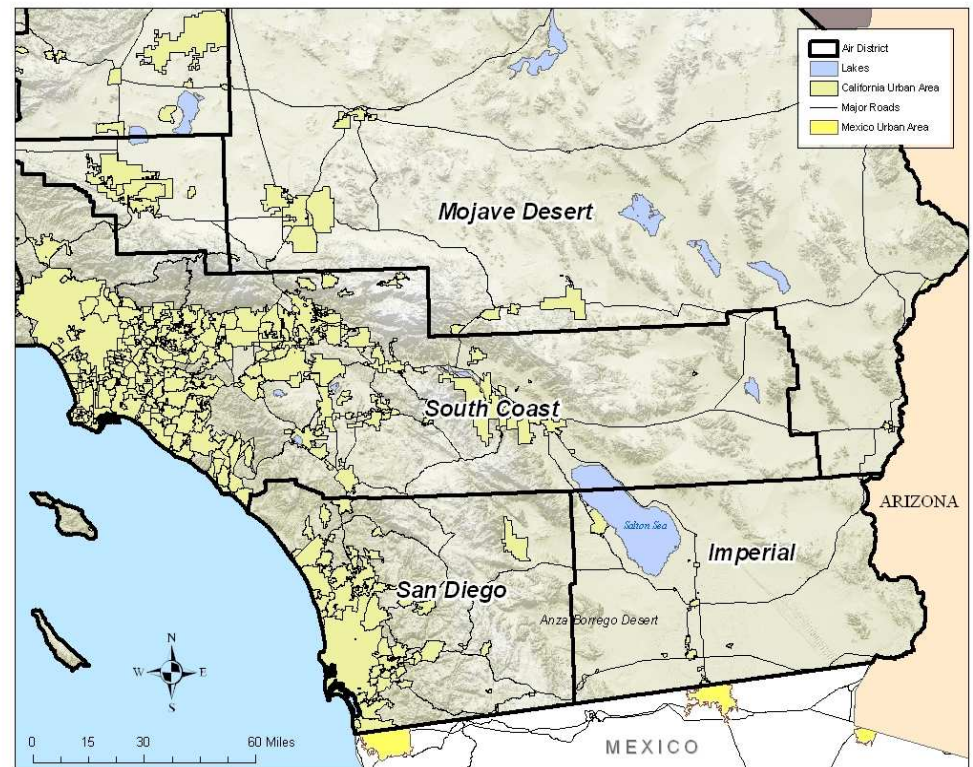
Air Resources Board

California Environmental Protection Agency

May 27, 2009
San Diego

Outline

- Current Air Quality
- Rule Improvements
- PM10 SIP Revision
- Moving Forward





Current Air Quality

Imperial County





Emissions Profile

- NO_x dominated by mobile sources
- PM₁₀ dominated by fugitive dust
- Significant emissions transported from South Coast and Mexicali



Air Quality Status

- Attains federal ozone standard (.08 ppm)
- Attains federal annual PM2.5 standard
- On average, 2-3 PM10 exceedances per year



Nature of PM10 Exceedances

- High Wind Natural Events
- International Transport



High Wind Natural Events

- Winds of 20 to 40 miles per hour
- Can suspend and transport dust throughout county
- U.S. EPA Regulations allow high wind natural events to be excluded from attainment planning
- These events are not preventable or controllable
- 3 events between 2006-2008

Example High Wind Event





Transport Events

- Occur during winter under stagnant conditions
- Impacts Calexico monitors
- Clean Air Act allows areas to show attainment “but for” international sources
- 2 events between 2006-2008

Example Transport Event from Mexico





Proposed Imperial County Rule Improvements



Background on Best Available Control Measures (BACM) Requirement

- Discrete Act requirement
- Serious areas must adopt BACM within 4 years
- The District adopted BACM rules in 2005
- ARB submitted BACM rules to U.S. EPA in 2006
- U.S. EPA final action pending



U.S. EPA Proposed Action on BACM

- Proposed partial disapproval of BACM rules in February 2010
- April 6th District letter committed to rule improvements
- May 24th U.S. EPA letter states additional rule analysis needed
- U.S. EPA commits to work with District



Imperial County PM10 SIP Revision



Examples of SIP Revisions

- Rules- Best Available Control Measures (BACM)
- Emission Inventory
- Transportation Conformity Budgets
- Attainment Demonstration



This SIP Revision is...

- Updated emission inventory
- Transportation conformity budgets
- 3 year air quality analysis (2006-2008)
- “But for” attainment demonstration
- Design value excludes natural events



Natural Event Information

- Standard is 150 ug/m³
- Typical day under 50 ug/m³
- Natural event up to 291 ug/m³
- Peak winds up to 35 mph
- Region wide exceedances
- Documentation submitted to U.S. EPA in June 2008 and May 2009



Transport Event Information

- Transport events up to 248 ug/m³
- Limited to border sites
- Concentrations less than 50 ug/m³ in remainder of County on these days
- Documentation following U.S. EPA guidance included in SIP



Clean Air Act Transport Provisions

- Clean Air Act includes provisions for areas impacted by international transport
- 179B(d) of the Act states:
“...State would have attained the national ambient air quality standard for PM10 by the applicable attainment date, but for emissions emanating from outside the United States...”
- Imperial County attains “but for” international transport
- Relieves failure to attain penalties



Latest EPA Action

- May 24th U.S. EPA letter "...U.S. EPA cannot propose approval of this PM10 SIP."
- Staff's revised recommendation is to take no action on SIP
- Submitting SIP would trigger a U.S. EPA disapproval process



Moving Forward on SIP



Consequences of No Action

- Infeasible to revise existing SIP
- New design value will be based on 2011 through 2013
- BACM rule improvements will proceed independent of SIP development process



Consequences of Failing to Submit a Plan

- EPA non-submittal finding
- Finding initiates:
 - Sanctions within 18 months
 - Federal Implementation Plan within 24 months
- May 24th letter U.S. EPA commits to work with District on a PM10 SIP



Implications for Transportation Conformity

- Transportation planning agency will continue to use existing build/no build test for projects



Moving Forward on Exceptional Events



Exceptional Events Rule

- Key for uncontrollable PM10 from high wind dust events and wildfires
- Documentation must show:
 - Event not reasonably preventable or controllable
 - Event caused the exceedance
 - Above typical concentrations
 - No exceedance but for event



Exceptional Event Policy Concerns

- U.S. EPA has been focusing on detailed emission source analysis
- U.S. EPA has been requiring detailed rule analysis despite the uncontrollable nature of the events
- U.S. EPA has been requiring extensive documentation irrespective of complexity of event



Exceptional Event Policy Solution

- Focus review on the “event”
- Link rule assessments to controllable emissions
- Streamline documentation