

March 18, 2010

Clerk of the Board,
Air Resources Board
1001 I Street,
Sacramento, California 95814

Subject: Public Hearing to Consider Proposed Amendments to the Area Designations for State Ambient Air Quality Standards

To the Clerk of the Board,

Thank you for the opportunity to comment on the Proposed 2010 Amendments to the State Area Designations, Criteria, and Maps. We would like to provide additional technical information and support the State's designations for Sacramento County. Our comment specifically relates to the proposed designation value of 19 ug/m^3 for our Sacramento-Del Paso Manor monitoring site.

Recently, CARB submitted¹ an exceptional event request to EPA because of the widespread air quality impacts from the wildfires that occurred during the summer of 2008. The CARB document identified 33 monitoring sites in 15 Air Districts in Northern California, including those in Sacramento County which recorded elevated PM levels due to the wildfires. Yet, Sacramento County was not identified as having been impacted by these incidences in the proposed document, "Proposed 2010 Amendments to the State Area Designations, Criteria, and Maps".

The regulation² specifying the criteria for designating an area as nonattainment states "(b) an area will not be designated as nonattainment if the only recorded exceedance of that state standard were based solely on data for record determined to be affected by highly irregular or infrequent event." Ambient concentrations at the Sacramento-Del Paso Manor site were influenced by exceptional events. We calculate that the adjusted³ designation value is 17 ug/m^3 for Sacramento County. This adjustment would not change the designation for Sacramento County as nonattainment for the State's $\text{PM}_{2.5}$ ambient air quality standard of 12 ug/m^3 . Therefore, we support the nonattainment designation.

1 "PM_{2.5} and PM 10 Natural Event Document: Summer 2008 Northern California Wildfires June/July/August 2008," CARB, August 28, 2009, Table 10

2 Calif. Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 1.5, Article 3, Section 70303

3 This value was determined by excluding the days affected by the wildfire- between June 21, 2008-July 26, 2008 as reported in the CARB Natural Event document submittal to EPA consistent with Appendix 2 to §70303. See attached file for calculations.

We hope providing this additional information supplementing the public record is helpful. If you have any questions regarding these comments, please contact our staff member Janice Lam at 916-874-4835 or Charles Anderson at 916-874-4831.

Sincerely,



Larry Greene
Executive Director/Air Pollution Control Officer

Attachment: DPM_BAM_2008_DesignValueCalc.xls

cc: Ms. Sylvia Zulawnick, CARB
Theresa Najita, CARB
Charles Anderson, SMAQMD
Janice Lam, SMAQMD