



COMITÉ CÍVICO DEL VALLE

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Imperial County Air Pollution Control District 2018 State Implementation Plan for the Annual PM2.5 Standard Comite Civico del Valle Comment

WOOD STOVE BURNING

The Imperial County APCD 2018 SIP for the Annual PM 2.5 Standard states in verbatim from the ARB presentation given on April 5th 2018, "As per the Clean Air Act Section 179B reduces planning requirements in border areas impacted from emissions from outside the US". It addresses Calexico as a nonattainment area as of 2016 data. The proposed control strategies for residential wood burning, NOx emission limits, and management of practices to limit NH3 are not considered to be enough, the draft also fails to address a binational effort that would create a greater benefit on the border's air quality and the district's community.

APCD's newly proposed controls to control residential wood burning by establishing a rule that would require new residential wood burning devices to comply with NSPS requirements is not an effective control method in Imperial County as residential wood burning is not a prevalent practice seen within the county; even with the Emission Inventory - Baseline (2012) reporting 0.82 tons/day PM2.5 originating from "Managed Burning and Disposal", what is the composition of that amount from *residential wood burning*. A projected reduction of PM 2.5 from wood stoves and wood burning fireplaces of 0.0007 tons/day is not an effective method to make Imperial County fall under attainment.

Additional Reasonable Measures (ARM) proposed in the draft plan include the curtailment of wood burning in Calexico for forecasted PM 2.5 elevated levels at the Calexico monitor. The curtailment of such practices in a bordertown that is in more dire need of international emissions actions is not satisfactory.

What the APCD SIP should have addressed in more solid actions in facilitating Mexican emissions controls across the border in Mexicali. That Clean Air Act Section 179B reduces planning requirements in border areas impacted by international emissions is not an excuse to reduce efforts in reaching attainment status. It is known that APCD has no authority over emission sources in Mexico, but facilitation might be an indirect way to influence more of the ProAire program goals of reducing PM2.5 emissions.

Oppose Imperial County APCD State Implementation Plan

Evaluating influences on air quality, the differences between the U.S. and Mexico side of the international border are most pronounced in terms of emission sources. On the U.S. side, and within Imperial County, sources of direct PM2.5 emissions consist of fugitive dust sources, including dust from unpaved roads, unregulated facilities (geothermals), natural gas plants, mobile sources originating in the US contribute to vehicle idling at the port of entry including diesel trucks (goods movement), agricultural tilling, mining, industrial solar farms, hay compressors, confined animal feeding operations (CAFOs).



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Analyses conducted for the Imperial County SIP for the 24-hour PM_{2.5} standard, coupled with a review of the inventory data for the current plan, indicate that total emissions of NO_x, SO_x, ROG, PM_{2.5}, and ammonia from Mexicali are higher on average than emissions from the Imperial County PM_{2.5} NA for the same source categories, the methods used for these analysis are by reactive methods, which is not federal referenced or equivalent methods.

The ratio of Mexicali emissions to Imperial County PM_{2.5} NA emissions ranges from 1.1 for ammonia to 13.7 for SO_x. However, the ability to accurately evaluate and compare inventories is limited due to the lack of information for emission categories in the Mexicali inventory as well as the overall uncertainty for the emissions estimates provided.

In addition, PM_{2.5}, ammonia, and methane emissions from 173 state jurisdiction point sources in Mexicali were not provided because emissions of these pollutants were not estimated by Baja California's Secretaria de Protección al Ambiente (SPA). The emission inventory for Mexicali also does not account for episodic events during the winter months.

If all Mexicali emissions of PM_{2.5} and other pollutants were calculated, we could actually identify that most sources including traffic originate in California. Combining emissions from the Imperial County PM_{2.5} NA and Mexicali together to form a single air shed inventory enables evaluation of the Imperial County PM_{2.5} NA contribution to the airshed. Based on the 2005 inventory values, NO_x, SO_x, ROG, PM_{2.5}, and ammonia from the Imperial County PM_{2.5} NA contributed 23 percent, 7 percent, 17 percent, 39 percent and 48 percent respectively to the total air shed. This approach provides a perspective on the relative contribution of local sources to the regions common air shed.

According to the APCD there are similarities in emission source patterns in areas surrounding the Calexico (U.S. portion), El Centro, and Brawley monitoring stations, and the dissimilarities in PM_{2.5} annual average concentrations recorded at the Calexico station compared with those at the El Centro and Brawley stations, an analysis of the relationships between PM_{2.5} emission inventories and air quality in these three communities was conducted. The objective was to estimate the annual average PM_{2.5} concentration that would exist at the Calexico station if the emission source patterns surrounding the station were the same as those to the north of the international border in the absence of Mexicali emissions sources.

In 2012 at the three PM_{2.5} monitoring stations within the Imperial County PM_{2.5} NA consistently show substantially higher values at the Calexico station. This analysis explores whether there are differences in near-monitor emissions inventories that can explain the differences between annual average PM_{2.5} concentrations at Calexico as compared to Brawley and El Centro. But to date the APCD does not have a current emissions inventory plan in place.

Imperial County APCD is a member of the Border 2020 program which emphasizes a regional bottom up approach for decision making, prioritizing and identifying issues to address air quality at the border region. The Border 2020 program which actually dates back over a decade was established to identify five goals to improve air quality and reduce pollution 1) promoting compliance with applicable vehicle emissions standards and reducing emissions at the port of entry through anti-idling measures 2) reduce



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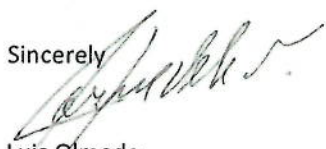
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criteria pollutant emissions to help achieve ambient air quality standards 3) maintaining effective air quality monitoring and measuring networks and providing real-time access to data 4) support climate action plans 5) reduce GHG emissions, to date none of these goals have been met and our air quality is getting worst.

This is not the first time Comité Cívico have raised many of the concerns in this letter. For years, we have requested that California Air Resources Board step up, it is disappointing that SIP after SIP (and now a woodstove burning addition) that we are again considering a state implementation plan that does not work for Imperial County, APCD should use all the additional data that is available through ivanair.org and Cal Enviro Screen and/or any other data available. Our Community Air Monitoring Data has been validated by Federal Reference Monitors using sound science. We know that attainment in the Salton Sea Basin is difficult however we need to look at all emission sources to bring our basin to attainment this will take a transformational approach. We ask the board to demonstrate they care about the residents of Imperial County and end the pattern of approving deficient plans. ARB is a public health agency, it knows how deadly air pollution is and it knows what is required to protect the public. We ask the board to demand the ICAPCD to produce a plan that will actually reduce and do what is necessary to achieve air that is safe for Imperial County to breathe.

Sincerely


Luis Olmedo
Executive Director

