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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

November 8, 2011

James Goldstene, Executive Officer
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812-2815

RE: PM2.5 SIP / Certification Letters to US EPA Region 9 re: BAAQMD monitoring data

Dear Mr. Goldstene:

US EPA designated the San Francisco Bay Area as non-attainment for the 35 $\mu\text{g}/\text{m}^3$ 24-hour PM2.5 national ambient air quality standard (NAAQS) in December 2009, based on air quality monitoring data for the 2006-2008 time period. As a result of this non-attainment designation, the Bay Area Air Quality Management District (BAAQMD) is required to prepare a State Implementation Plan (SIP) submittal by fall 2012 to show how the Bay Area will attain the 24-hour PM2.5 NAAQS by December 2014. However, Bay Area 24-hour PM2.5 levels have declined over the past several years. Monitoring data shows that all PM2.5 monitoring stations in the Bay Area met the 24-hour PM2.5 NAAQS for the three-year period of 2008-2010. US EPA guidelines provide that in the case where monitoring data demonstrates that an air district currently attains the NAAQS, the California Air Resources Board (ARB) may submit a "clean data finding" to US EPA on behalf of the district.

BAAQMD staff has been coordinating with staff of the ARB Planning and Technical Support Division in regard to the 24-hour PM2.5 SIP. Based on these discussions, our understanding is that ARB staff will prepare and submit to US EPA a "clean data finding" request to cover the Bay Area, as well as the Butte County and Feather River air districts. ARB staff requested that the BAAQMD provide monitoring certification letters for years 2008, 2009, and 2010 as documentation to support the "clean data finding" request. In response to this request, we are enclosing copies of the monitoring certification letters.

Based on our "clean" PM2.5 monitoring data for years 2008-2010, we understand that, in lieu of submitting a PM2.5 attainment plan to fulfill federal SIP requirements, the BAAQMD has the option to either prepare a redesignation request and PM2.5 maintenance plan, or an "abbreviated SIP" submittal. We believe that it would be premature to submit a redesignation request and PM2.5 maintenance plan at this time.

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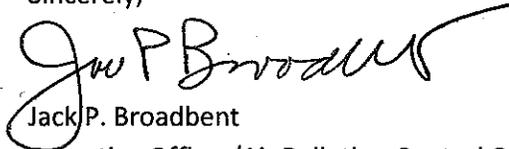


Therefore, the BAAQMD intends to prepare an "abbreviated SIP" consisting of the three required elements:

- An emission inventory for primary PM_{2.5}, as well as precursors that contribute to secondary PM formation
- A transportation conformity budget for emissions of primary PM_{2.5} and NO_x from on-road motor vehicles (to be developed in coordination with the Metropolitan Transportation Commission)
- Amendments to BAAQMD's New Source Review (NSR) regulation to address PM_{2.5} as a regulated pollutant

We look forward to continued collaboration with ARB staff in preparing the PM_{2.5} SIP submittal. If you have any questions, please contact David Burch at dburch@baaqmd.gov or 415-749-4641.

Sincerely,



Jack P. Broadbent

Executive Officer/Air Pollution Control Officer

Enclosures

cc: Patricia Velasco, ARB
Sylvia Zulawnick, ARB