



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

July 3, 2013

Mr. Jared Blumenfeld
Regional Administrator
U.S. Environmental Protection Agency
Region 9
75 Hawthorn Street
San Francisco, California 94105

Dear Mr. Blumenfeld:

The Air Resources Board (ARB) hereby transmits to the U.S. Environmental Protection Agency (U.S. EPA) the San Joaquin Valley Air Pollution Control District's (District) *Quantification of Contingency Reductions for the 2008 PM2.5 Plan* (Quantification of Contingency) as a revision to the California State Implementation Plan (SIP). The District adopted the Quantification of Contingency on June 20, 2013. ARB approved the Quantification of Contingency as a revision to California's SIP on June 27, 2013.

On November 9, 2011, U.S. EPA approved the District's 2008 PM2.5 Plan, with the exception of the contingency measures element. U.S. EPA determined the plan did not document sufficient emission reductions from contingency measures. This disapproval triggered sanctions that begin on July 9, 2013. The District's Quantification of Contingency documents contingency emission reductions sufficient to meet the requirements of the Clean Air Act. This revision should resolve the pending application of sanctions and allow U.S. EPA to fully approve California's PM2.5 SIP for the San Joaquin Valley.

The transmittal includes two hard copies and one identical electronic copy of the following materials (enclosed):

- A. June 21, 2013, letter from Mr. Samir Sheikh, Director of Strategies and Incentives of the District, to Mr. Richard Corey, ARB Executive Officer, submitting:
 - 1. *Quantification of Contingency Reductions for the 2008 PM2.5 Plan*.
 - 2. Governing Board Resolution Authorizing Submittal of the District *Quantification of Contingency Reductions for the 2008 PM2.5 Plan* to EPA.
 - 3. Governing Board Memo.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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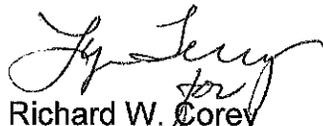
B. ARB Resolution 13-30 adopting the *Quantification of Contingency Reductions for the 2008 PM2.5 Plan* as a SIP revision.

C. ARB Staff Report, *San Joaquin Valley PM2.5 Contingency Measures Update*.

The District's Quantification of Contingency relies on using directly emitted PM2.5 emission reductions from implementation of a more stringent residential wood burning curtailment program that are beyond those needed to satisfy PM2.5 contingency to address a portion of the NOx contingency needs. A 9 to 1 trading ratio of NOx to PM2.5 previously approved by U.S. EPA for use in transportation conformity determinations was used for this analysis. The trading ratio was developed by evaluating the effects of Valley-wide PM2.5 and NOx emission reductions on annual PM2.5 concentrations. PM2.5 concentrations in the Valley exhibit a strong seasonality, with highest levels during the winter months. As such, improvements in annual PM2.5 concentrations are driven by reductions in directly emitted PM2.5 and NOx emissions that occur during the winter. In addition, winter PM2.5 concentrations are generally highest in the urban areas, where focused reductions in residential wood burning have a large impact. Therefore, the Valley-wide method used to develop the trading ratios provides a conservative estimate of the relative effectiveness of direct PM2.5 emission reductions compared to NOx reductions for contingency purposes.

If you have any questions regarding this submittal, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Mr. Kurt Karperos, Chief, Air Quality Planning & Science Division, at (916) 322-0285.

Sincerely,


Richard W. Corey
Executive Officer

Enclosure(s)

cc: See next page.

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cc: (w/o enclosures)

Mr. Seyed Sadredin
Executive Director/Air Pollution Control Officer
San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, California 93726

Ms. Lynn Terry
Deputy Executive Officer

Mr. Kurt Karperos, Chief
Air Quality Planning & Science Division