



Air Resources Board

Barbara Riordan, Chairman

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Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

December 10, 1998

Ms. Felicia Marcus
Regional Administrator
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Ms. Marcus:

Enclosed are two copies of a revision to California's State Implementation Plan (SIP) for particulate matter less than ten microns in diameter (PM10) for the Owens Valley PM10 planning area. The Great Basin Unified Air Pollution Control District's (District) *Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan* (1998 Revised SIP) was prepared in response to the federal Clean Air Act (Act) requirements for "serious" PM10 nonattainment areas. The 1998 Revised SIP, which was adopted by the District on November 16, 1998, was approved by the Air Resources Board's Executive Officer for submittal as a SIP revision. The enclosure to this letter lists the materials included in this submittal. For completeness purposes, we are sending you a previous version of the SIP adopted by the District in 1997 as well as the 1998 Revised SIP. However, the 1998 Revised SIP incorporates all the revisions made to the 1997 version and represents the final version of the SIP revision that is being submitted for approval.

The 1998 Revised SIP represents significant improvements to the existing PM10 SIP for the Owens Valley. It includes an analysis of the particulate matter air pollution problem in the Owens Valley and a control strategy for bringing the area into attainment with the National Ambient Air Quality Standards (NAAQS) for particulate matter.

The control strategy relies on four control measures to mitigate the primary source of PM10 emissions in the Owens Valley - wind blown PM10 emissions from the exposed playa at Owens Lake. The 1998 Revised SIP also incorporates a District Board Order #981116-01 (Order) to the City of Los Angeles to implement the Owens Valley PM10 SIP control measures according to mandatory implementation milestones which will be used to demonstrate reasonable further progress as required by the Act.

As you know, the PM10 problem in the Owens Valley is unique and complex, and the 1998 Revised SIP represents a consensus approach to addressing PM10 emissions in the Owens Valley. The proposed level of control of a dry lakebed such as Owens Lake has never been demonstrated on such a scale. The uncertainties relative to the control measures specified and the overall uniqueness of Owens Lake warrant a flexible approach and provide ample support for the plan's request that the U.S. EPA grant a five year extension to the PM10 NAAQS

California Environmental Protection Agency

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compliance date. Such an extension would allow the District until 2006 to successfully implement the control strategy for the Owens Valley.

In recognition of the uncertainties pertaining to PM10 modeling and control strategies, the District also commits to revise the SIP and Board Order in 2003 to incorporate new knowledge and provide for attainment of the PM10 NAAQS by December 31, 2006, if attainment has not occurred sooner.

Thank you for your prompt attention to this submittal. For your information, we will also send you three additional copies of the SIP submittal materials as soon as we receive them from the District. Should you have any questions, please call me, at (916) 445-4383, or Mr. Dean Saito, Manager, Liaison Section, Air Quality and Transportation Planning Branch at (916) 322-8279.

Sincerely,



Michael P. Kenny
Executive Officer

Enclosures

cc: Ellen Hardebeck, Air Pollution Control Officer
Great Basin Unified Air Pollution Control District

Gerald A. Gewe, Office of the Water Executive
Los Angeles Department of Water & Power

List of Enclosures

- A. November 23, 1998 correspondence from the Great Basin Unified Air Pollution Control District (District) including attachments:
1. Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan
 2. Resolution No. 98-04 and 98-05 of the District Board, dated November 16, 1998, adopting the PM10 Plan Revision for the District and certifying Addendum No. 1 to the final environmental impact report (Included in the back of the Revised Attainment Demonstration SIP)
 3. Proof of publication of the Hearing Notice for the PM10 Plan Revision. (Included in the back of the Revised Attainment Demonstration SIP)
 4. Written responses to comments received on the Revised PM10 Plan (Included as Appendix H and I to the Plan)

September 25, 1998 Public Notice

- B. July 1997 Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan including proof of publication of the Hearing Notice, Resolutions 97-05 and 97-06, and written responses to comments received.
- C. Owens Valley PM10 Planning Area Demonstration of Attainment State Implementation Plan Environmental Impact Report Documents:
1. Draft Environmental Impact Report
 2. Proposed Response to Comments and Final Environmental Impact Report
 3. Addendum Number 1 to the Final Environmental Impact Report
- D. Executive Order G-125-245 of the California Air Resources Board, adopting the Revised Attainment Demonstration SIP for the Owens Valley PM10 Planning Area as a revision to the California State Implementation Plan for PM10.
- E. Completed Checklist of Applicable SIP Completeness Criteria