



Alan C. Lloyd, Ph.D.
Agency Secretary

Air Resources Board

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Arnold Schwarzenegger
Governor

February 24, 2006

Mr. Wayne Nastri
Regional Administrator
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Nastri:

The California Air Resources Board (ARB or Board) hereby submits to the U.S. Environmental Protection Agency (U.S. EPA) the *2005 Carbon Monoxide Redesignation Request and Carbon Monoxide Maintenance Plan for the South Coast Air Basin* (2005 CO Plan). The 2005 CO Plan establishes that the South Coast Air Basin has met the federal CO air quality standard since 2002 and demonstrates that the Air Basin will continue to maintain the CO standard through at least 2015. We request that you approve the 2005 CO Plan as a revision to California's State Implementation Plan (SIP) and redesignate the South Coast Air Basin to "attainment" for CO. Additionally, pending federal approval of the redesignation request, ARB requests that U.S. EPA make an expeditious finding that the Air Basin has attained the federal CO standards.

The 2005 CO Plan also updates emission estimates and establishes new on-road motor vehicle emission budgets for transportation conformity purposes. It is important that metropolitan planning organizations in California be able to use motor vehicle emissions budgets as soon as U.S. EPA finds them adequate. Accordingly, we request that U.S. EPA structure its approval of the 2005 CO Plan budgets to allow for their replacement when U.S. EPA finds the subsequent budgets adequate. This is in keeping with past practice and is consistent with U.S. EPA rules as described in 93.118(e)(1) of the conformity regulation.

Background: In 1991, U.S. EPA designated the South Coast Air Basin as nonattainment for the federal 8-hour CO standard. A CO SIP was adopted by the South Coast Air Quality Management District (South Coast District) and ARB in 1992, and revised in 1994, 1997, 2003 and 2005. In April 1998, U.S. EPA fully approved the State and local control strategy provisions of the CO Plan and granted interim approval for the 1997 CO Plan's rate of progress (ROP) and attainment demonstration.

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

Based on the adopted control strategy which includes California's motor vehicle, fuels, and Smog Check programs, the South Coast Air Basin came into attainment of the federal 8-hour CO standard beginning in 2002. In March 2005, the South Coast District adopted a CO Redesignation Request and CO Maintenance Plan.

To demonstrate compliance with Clean Air Act maintenance plan requirements, the CO Redesignation Request provides the following information pursuant to criteria established in U.S. EPA's "Clean Data Policy" (June 1995) for redesignation to attainment:

- Quality-assured air quality data from the two most recent years that show no violations of the federal CO standards;
- Emission forecasts that demonstrate the South Coast Air Basin will remain in attainment of the federal CO standards through at least 2015;
- Verification that the South Coast District maintains, and will continue to maintain, a comprehensive CO air monitoring network throughout the South Coast Air Basin in accordance with Title 40, part 58 of the Code of Federal Regulations (CFR);
- A commitment to continue implementation and enforcement of the federally-approved CO Plan control strategy that will result in additional emission reductions through 2015; and,
- Contingency emission reductions from adopted ARB measures that generate progressively more benefits over time, effectively decreasing CO emissions well below attainment levels throughout the maintenance period.

As a serious CO nonattainment area, sections 187(a)(6) and 187(b)(1) of the Clean Air Act (CAA) require the South Coast Air Basin to have an enhanced motor vehicle inspection and maintenance (I&M) program. U.S. EPA regulations indicate that the performance standard for a low enhanced I&M program is equivalent to the basic I&M program performance standard, with the addition of visual inspections of the positive crankcase and exhaust recirculation valves (see 40 CFR 51.351(a) and 40 CFR 51.351(g)). These additional visual inspections are designed to reduce ozone precursor emissions, but do not appreciably impact CO emissions.

In January 1997, U.S. EPA approved California's Smog Check program as meeting basic I&M requirements (62 Federal Register 1149). The California Smog Check program also includes idle mode testing, and mandates positive crankcase and exhaust recirculation valve visual inspection as specified in U.S. EPA's requirements for a low

enhanced I&M program. We are including for your information a September 2005 Report to the Legislature regarding ARB's "April 2004 Evaluation of the California Enhanced Vehicle Inspection and Maintenance (Smog Check) Program." The findings in this report validate that the California program meets and exceeds the federal requirements for basic and low enhanced I&M programs. The report incorporates an improved mobile source emissions inventory than that contained in the 1994 SIP. For this reason, the current Smog Check emission reduction estimates cannot be directly compared to the 1994 SIP targets.

For your information, we have disaggregated the statewide numbers contained in the 2005 Report for the South Coast Air Basin to identify the CO benefits from the current Smog Check program as follows:

**South Coast Air Basin
On-Road Motor Vehicles
CO Emissions Benefit for Winter Season
(tons per day)**

	1990	1993	2000	2006	2010	2020
CO Reductions	494	459	291	671	618	377

Enclosures: The formal SIP package consists of a computer disk and five copies of the following documents:

1. 2005 Request for Carbon Monoxide Redesignation and Carbon Monoxide Maintenance Plan for the South Coast Air Basin (March 2005).
2. ARB Executive Order G-125-332 adopting the 2005 CO Redesignation Request and Maintenance Plan.
3. Proof of Publication for Notice of Public Hearing.
4. Transcripts of regional public hearings on the 2005 CO Redesignation Request and Maintenance Plan.
5. SIP Completeness Checklist.
6. Summary of the March 4, 2005 South Coast District Board hearing and response to comments.

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If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Mr. Kurt Karperos, Chief, Air Quality and Transportation Planning Branch, at (916) 322-0285.

Sincerely,

/s/ LMT for

Catherine Witherspoon
Executive Officer

Attachments

cc: See next page.

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cc: Dr. Barry R. Wallerstein, D. Env.
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Mr. Kurt Karperos
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