AIR POLLUTION CONTROL DISTRICT

IMPERIAL COUNTY YEAR 5 COMMUNITY EMISSIONS REDUCTION PROGRAM PLAN FOR THE NORTH END PHASE 1 COMMUNITY

CARB APPROVED MARCH 2025

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YEAR 5 COMMUNITY EMISSIONS REDUCTION PROGRAM PLAN FOR THE IMPERIAL COUNTY NORTH END PHASE 1 COMMUNITY

Prepared for

Imperial County AB 617 Steering Committee

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Abbreviations and Acronyms

AB	assembly bill
ABERC	Agricultural Burning Emission Reduction Credit
AER	alternative emission reduction
APCO	Air Pollution Control Officer
AQS	Air Quality System
ATCM	airborne toxic control measures
ATV	all-terrain vehicle
BACM	best available control measures
BACT	best available control technology
BARCT	best available retrofit control technology
CAFO	concentrated animal feeding operations
CAL	community air quality level
CalEPA	California Environmental Protection Agency
CAPP	Community Air Protection Program
CAP	criteria air pollutant
CARB	California Air Resources Board
CCV	Comite Civico del Valle, Inc.
CEPAM	California Emissions Projection Analysis Model
CES3	CalEnviroScreen, Version 3.0
CEQA	California Environmental Quality Act
CH_4	methane
CO	carbon monoxide
CUPA	Certified Unified Program Agency
DMV	department of motor vehicles
DPM	diesel particulate matter
ECL	emission control label
ERC	emission reduction credit
FARMER	Funding Agricultural Replacement Measures for Emission Reduction
GHG	greenhouse gas
GMERP	Goods Movement Emission Reduction Program
GPS	global positioning system
HDVIP	Heavy-Duty Vehicle Inspection Program
HHDV	heavy heavy-duty vehicle
HPUD	Heber Public Utility District
HSC	Health and Safety Code
ICAPCD	Imperial County Air Pollution Control District
IVAN	Identifying Violations Affecting Neighborhoods
LCFS	Low Carbon Fuel Standard
LDV	light duty vehicle
LHDV	light heavy-duty vehicle
MHDV	medium heavy-duty vehicle
NAAQS	National Ambient Air Quality Standards
NH_3	ammonia

NO_2	nitrogen dioxide
NOV	notice of violation
NRM	NOx Remediation Measure
NSPS	New Source Performance Standards
NTC	notice to comply
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHV	off-highway vehicle
Pb	lead
PERC	Paving Emission Reduction Credit
PERP	Portable Equipment Registration Program
PMF	positive matrix factorization
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
RACM	reasonably available control measures
RACT	reasonably available control technology
ROG	reactive organic gases
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SB	Senate Bill
SEP	Supplemental Environmental Project
SFTP	Secure File Transfer Protocol
SIP	State Implementation Plan
SMP	Smoke Management Program
SO_2	sulfur dioxide
SORE	small off-road engines
SPM	special purpose monitor
TAC	toxic air contaminant
TIGER	topologically integrated geographic encoding and referencing
Tpy	tons per year
$\mu g/m^3$	microgram per cubic meter
USEPA	United States Environmental Protection Agency
VEER	Vehicle Emissions on Each Road
VMT	vehicle miles travelled
VOC	volatile organic compound
ZEV	zero-emission vehicle

1. Introduction and Background

1.1 Introduction

This Year 5 Community Emission Reduction Program Plan ("Emission Reduction Plan" or "Plan") presents objectives and methodologies for the Community Emission Reduction Program in the North End Phase 1 Community in Imperial County, California ("Community"). This Plan was developed in response to the selection of this Community to implement an emissions reduction program under the California Air Resources Board (CARB) Community Air Protection Program (CAPP), a program established to help implement California Assembly Bill 617 (AB 617). This Plan specifically addresses the planning elements laid out in CARB's Community Air Protection Blueprint ("Blueprint") Version 2.0, the most recent version of the guidance document developed for the CAPP.[1] Each of the planning elements ultimately serve to address two main health-based objectives, which are:

- Maximizing progress on reducing exposure to toxic air contaminants that contribute to cumulative exposure burdens within selected communities; and
- Reducing exposure caused by localized particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$) sources to achieve healthful levels of $PM_{2.5}$ within the community.

This Plan demonstrates how the Community plans to reduce emissions at the local scale by identifying targets and implementing strategies to improve local air quality and ultimately satisfy these health-based objectives.

1.2 Background

1.2.1 Assembly Bill 617

On July 26, 2017, California Governor Jerry Brown signed into law AB 617, an act to amend and add sections regarding air pollution to California's Health and Safety Code. The bill directs CARB and local air districts throughout the state (including the Imperial County Air Pollution Control District [ICAPCD or "District"]) to enact measures to promote public health and welfare by reducing air pollution on a local scale, particularly in communities that are disproportionately burdened by air pollution. AB 617 was designed to accomplish this via the establishment of the CAPP, which puts the emphasis on community-focused actions that go beyond the regional and statewide air quality programs already in place.

AB 617 was designed to specifically improve air quality in disadvantaged communities with high exposure burdens for criteria air pollutants (CAPs)[2] and toxic air contaminants (TACs).[3] These

[1] CARB. 2023. Community Air Protection Program Blueprint 2.0. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-04/BP2.0_FULL_FINAL_ENG_2024_04_09.pdf. Accessed: October 2024.

[2] Includes the six federally regulated air pollutants with National Ambient Air Quality Standards established by the USEPA as a requirement of the Clean Air Act. Additional information available at: https://www.epa.gov/criteria-air-pollutants. Accessed: October 2024.

[3] Defined by the California Health and Safety Code as air pollutants which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Additional information available at: https://oehha.ca.gov/air/toxic-air-contaminants. Accessed: October 2024.

improvements are to be accomplished through community emissions reductions programs, community air monitoring plans, or both. Section 1.2.2 describes the process by which the Year 5 communities were selected, including the North End Phase 1 Community in Imperial County.

1.2.2 Community Nomination Overview

As part of the CAPP, CARB's Governing Board selected California communities to participate by implementing a community air monitoring program, a community emissions reduction program, or both. AB 617 stipulated that the first round of communities was to be selected by October 1, 2018 and annually thereafter (i.e., beginning January 1, 2020). Each year, the selection process involves three steps: Identification, Assessment, and Selection. During the Identification phase, CARB staff updates the running list of potential communities for participation in the CAPP. Input is collected from air districts across the state and from the Office of Environmental Health Hazard Assessment (OEHHA), as well as internally from CARB's own experience and data resources. Community members are also able to nominate their own or other communities for consideration. Once this broad list of potential communities has been updated, the next step is to assess the options.

In the Assessment phase, CARB staff will continue to consult with community stakeholders, OEHHA, and the air districts to determine which potential communities are experiencing disproportionate burdens due to cumulative air pollution exposure. The CAPP Blueprint details the factors that are to be evaluated during this phase, which may include ambient air concentrations of specific CAPs and TACs, quantified health risk estimates based on modeling, the proximity of sensitive populations to significant sources of air pollution, and socio-economic factors. Once the available and relevant data has been assessed, the final phase, Selection, is initiated.

1.2.3 Imperial County Community Nominations

Both local air districts and community members alike can identify communities and submit nominations to CARB as part of the CAPP community selection process. A nomination for a community in the northern part of Imperial County was submitted for consideration in Year 2 of the AB 617 program (i.e., for selection in 2019).[4] The suggested community included the City of Brawley, City of Calipatria, City of Westmorland, City of Imperial, and the unincorporated communities of Niland, Desert Shores, Salton Sea Beach, Salton City, Bombay Beach, and Seeley. Ultimately, this community was not selected by CARB in 2019.

In 2022, the nomination was modified to focus on the cities of Brawley, Calipatria, and Westmorland, identifying the new area as the "North End Phase 1" Community.[5] On February 23, 2023, CARB selected the North End Phase 1 Community to be included among the Year 5

[4] ICAPCD. 2019. Imperial County Community AB617 Community Nominations. Available at: https://ww2.arb.ca.gov/sites/default/files/2019-11/2019%2010%2023%20ICAPCD%20CCV%20Northend%20Nomination.pdf. Accessed: October 2024.

[5] ICAPCD. 2022. Imperial County AB617 Community Nominations (2022). Available at: https://ww2.arb.ca.gov/sites/default/files/2022-11/22%2008%2002%20ICAPCD%20North%20End%20Phase%201%20Community%20Nomination%20Letter.pdf. Accessed: October 2024.

communities in the CAPP. The North End Phase 1 Community was selected to develop both a Community Air Monitoring Plan (CAMP) and Community Emission Reduction Program (CERP).[6]

1.2.4 Community Steering Committee

A hallmark of the CAPP is community-driven action. AB 617 was written to allow members from within the selected communities to take an active role in the development of their own air monitoring plans and emission reduction programs. Those who live and work in a selected community are both the most familiar with it and the most invested in promoting its environmental quality. Thus, AB 617 places an emphasis on community-driven action achieved under the oversight of groups known as community steering committees. These committees are to be comprised of primarily individuals who live and work within the communities they will represent. CARB suggests that these committees include "community members who live, work, or own businesses within each community (e.g., community residents, small businesses, facility managers/workers, school personnel), with a majority of representation from community residents."[7] CARB notes that a steering committee may also include representatives from local environmental justice and public health community based organizations (CBOs), local agencies, local health departments, members of academia, and local labor organizations, as appropriate.

In late 2023, ICAPCD assembled a steering committee for the North End Phase 1 Community. Referred to as the AB 617 Community Steering Committee ("Steering Committee"), this group is intended to be involved with all aspects of the CERP and the CAMP, including participant recruitment, identification of key objectives, monitoring site selection, emission reduction strategy selection, and evaluation and dissemination of air monitoring data. The Steering Committee is also intended to maintain communication with other community members throughout the planning process to gather input from concerned community members and facilitate ongoing discussion.

1.3 Objective

The North End Phase 1 Community was tasked with developing both a CAMP and a CERP. This Plan serves to satisfy the requirements of the latter and was developed according to the guidelines laid out in the CAPP Blueprint 2.0 and aims to establish local programs that go beyond existing efforts to reduce air pollution. This CERP was designed to be "action oriented", i.e., it includes direction for how the strategies should be implemented and how the emission reductions will be tracked and enforced. These strategies contribute to the overall objective of promoting public health and welfare in the Community through improvements in local air quality.

A key objective of AB 617 and the CAPP is to bring environmental justice considerations into the scope of actions in disadvantaged communities. These chosen disadvantaged communities have been nominated and selected by CARB as areas where there will be benefits from monitoring and community emissions reductions strategies. The North End Phase 1 Community is one of those designated communities. Following the principles of the CAPP, this Plan aims to encompass the

[6] CARB. 2023. AB617 Community Air Protection Program Fifth Annual Community Recommendations. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-02/2023%2001%20ComRec%20Fact%20Sheet_ENG%20Final.pdf.pdf. Accessed: October 2024.

[7] CARB. 2023. Community Air Protection Program Blueprint 2.0. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-04/BP2.0_FULL_FINAL_ENG_2024_04_09.pdf. Accessed: October 2024.

principles of environmental justice: to mitigate disproportionate impacts of environmental pollution on disadvantaged communities, engage in conversations of mutual respect with all peoples, and ensure the right to ethical and sustainable use of land and resources.

1.3.1 Health-Based Air Quality Actions

The overarching goal of community emissions reduction programs is to reduce CAP and TAC emissions in order to mitigate the impacts of exposure. While each of the communities selected to participate in the CAPP faces its own distinct air quality and health challenges, broad objectives provide a framework that emissions reduction programs can be developed around. Accordingly, the CAPP Blueprint 2.0 specifies the following broad health-based air quality objectives, which are mandatory to include in CERPs:

- Reduce emissions of and exposure to TACs that contribute to the cumulative exposure burden within the community.
- Reduce emissions of and exposure to local sources of $PM_{2.5}$ that contribute to the cumulative exposure burden within the community.

TACs include a long list of pollutants that contribute to the cumulative exposure burden in an area. Relatively common TACs include diesel particulate matter (emitted from diesel-fueled engines), hexavalent chromium, lead, benzene, and toluene. While many statewide programs in California have worked to reduce TAC emissions in recent decades, some communities are currently experiencing disproportionate exposures to them. Health risks associated with exposure to TACs may include acute and/or chronic illnesses, or increased cancer risks.

Communities in California also face air quality issues related to CAPs. Specifically, $PM_{2.5}$ and ozone (O_3) are of particular concern due to their elevated concentrations, which exceed federal standards in many California communities. However, the CAPP Blueprint 2.0 criteria for Health-Based Air Quality actions only incudes a mandatory health-based air quality objective for addressing $PM_{2.5}$. Ozone is not addressed in the specific goals because of the nature of its formation. Ground-level ozone in the atmosphere is formed over time by the reaction of precursor pollutants rather than being directly emitted by sources. The complex chemical reactions that form ozone occur on a regional scale, widely dispersed from wherever the precursors were originally emitted. In contrast, particulate matter (and specifically $PM_{2.5}$) in the atmosphere is the result of both regional and localized emissions. Thus, targeted emissions reductions on a local scale can reduce particulate exposure in overburdened areas in a way that reductions of ozone precursor emissions cannot. Similarly, actions to address other CAPs are not listed as explicit goals in the Health-Based Air Quality Actions, but are addressed by various other CARB initiatives.

1.4 Document Organization

This Plan was developed and organized following the guidelines laid out in the CAPP Blueprint prepared by CARB. Specifically, each of the subsequent sections in this Plan addresses one or more planning elements (summarized in Table 1.1 below).

Table 1.1. Community Emissions Reduction Program Planning Elements (per Appendix B of CARB Blueprint 2.0)[8]

Section	Title	Planning Elements Addressed
1.3.1	Health-Based Air Quality Actions	• Develop actions to reduce negative health impacts
2.1	Community Steering Committee	• Provide documentation on the CSC
2.2	Outreach and Engagement	• Provide documentation of public board hearings • Provide documentation of available materials and a dedicated public webpage • Provide public outreach summary
3.1	Community Profile	• Provide community description and discussion of community issues
3.2	Technical Foundation	• Provide an emissions inventory • Provide supporting methodology, data sources, results
4.1, 4.3	Emissions Reduction Targets, Exposure Reduction Targets	• Set 5-year emissions targets • Specify metrics and mechanisms
4.4, 6	Reduction Actions and Implementation Schedule, Required Metrics	• Develop emissions/exposure reduction actions • Identify statewide actions from CARB to reduce emissions and exposure • Specify annual metrics to track progress • Specify evaluation approaches • Identify additional tracking metrics (as appropriate)
4.4	Reduction Actions and Implementation Schedule	• Specify an implementation schedule for each action
5	Enforcement Plan Requirements	• Document a three-year enforcement history • Specify compliance mechanisms
7	California Environmental Quality Act (CEQA) Analysis	• Include applicable CEQA analysis

[8] CARB. 2023. Appendix B: Community Emissions Reduction Program Checklist. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-09/BP2.0%20Appendix%20B_CERP%20Checklist_FD.pdf. Accessed: October 2024.

2. Community Partnerships and Public Engagement

2.1 Community Steering Committee

Community members are well suited for providing direct insight on the air quality issues in their community and their input is necessary to ensure effective community-focused strategies. As part of this planning element, a community steering committee must be formed to facilitate communication between community members and the air district, as well as to carry out emission reduction goals and objectives. Additionally, a steering committee develops outreach opportunities to ensure that the community is able to participate in the decision-making process. The Steering Committee formed by the ICAPCD fulfills the requirements of this planning element.

2.1.1. Community Steering Committee Development Process

The purpose of the Steering Committee is to identify and prioritize air pollution issues, guide actions for the CAMP and the CERP, define the community and its boundaries, develop approaches for and assist with community outreach, track progress on the overall CAPP, and help identify potential solutions with community stakeholders. The Steering Committee for the North End Phase 1 Community was convened by the ICAPCD following its selection as a CAPP Year 5 community.

On July 26, 2023, ICAPCD and CARB met with community members to initiate the process of creating and nominating members to the Steering Committee for the North End Phase 1 Community. The purpose of this meeting, which was open to the general public, was to begin the process of selecting Steering Committee members from those interested in being a part of it. The goal was for this Steering Committee to consist of nine individuals, ideally with equal representation from each city (i.e., three people each from Brawley, Westmorland, and Calipatria). Along with the nine main committee members, nine alternate committee members were initially determined to be included as backups if any main committee members are unable to attend meetings. Candidates interested in applying to the Steering Committee must have a stake in the community by either living, working, or having a business in the cities of Brawley, Calipatria, or Westmorland. The North End Phase 1 Steering Committee differs from the South County committee in that there are no co-chairs. Instead, the intent is that city representatives oversee agenda management.[9]

The District discussed the applications received during the application period over the course of several meetings held in the months of July, August and September, 2023. The District Air Pollution Control Officer (APCO) then reviewed each application and worked with ICAPCD staff to determine which applicants were eligible and most aligned with the spirit and objectives of the CAPP Blueprint.

Since its formation, the Steering Committee has been involved with all aspects of both this Plan and the CAMP. In the formation of this Plan, Steering Committee activities have included and will continue to include participant recruitment, identification of key objectives, development of emission/exposure reduction strategies, and evaluation and dissemination of results. Additionally,

[9] Calexico Chronicle. 2023. Northend AB 617 Pollution Board Has First Meeting. Available at: https://calexicochronicle.com/2023/07/30/northend-ab-617-pollution-board-has-first-meeting/. Accessed: October 2024.

the Steering Committee is intended to serve as a communication channel with other Community members to gather input from concerned community members and facilitate ongoing discussion about the CAPP.

The Steering Committee consists of nine members (three members from each city) with six alternates that are Community representatives. Some of these Community representatives are affiliated with various organizations around the Brawley, Westmorland, and Calipatria area, including local government, businesses, and non-profit organizations. They were selected to participate in the Steering Committee based on their potential to act as leaders and contribute technical expertise during planning. A table with the names and affiliations of each member can be found in the AB 617 Steering Committee Charter in Appendix B to this Plan. In the event that any Steering Committee members are unable to perform their duties, the alternates listed in the table are expected to step in.

2.1.2 Community Steering Committee Charter

In 2023, staff from ICAPCD developed and proposed a draft AB 617 Steering Committee Charter ("Charter") for consideration by the Steering Committee. The Charter was then submitted to the ICAPCD Governing Board, which is comprised of members of the Imperial County Board of Supervisors. Formally approved by the Imperial County Board of Supervisors on October 17, 2023, the Charter establishes the authority and purpose of the Steering Committee along with its bylaws and the intended structure and schedule for regular Steering Committee meetings.[10] The draft Charter was discussed and formally approved by the Steering Committee around this time.

The Steering Committee is responsible for supporting active community involvement and collaboration in the development of the CAPP by providing a forum for identifying community issues and potential solutions with all relevant parties. Topics of discussion can include approaches for community engagement and outreach, identifying sources contributing to the Community's air quality challenges, strategies for developing and implementing the community air monitoring and emissions reduction programs, targets and strategies, and metrics to track progress. The Charter specifies that these meetings be held at least once per month, unless there is a lack of agenda topics, in which case a vote may be held to cancel the following month's meeting. Special meetings may also be held as required. A summary of the Steering Committee meetings conducted to date is available in Appendix A. A copy of the Charter is presented as Appendix B.

2.2 Outreach and Engagement

As part of the commitment to community engagement and outreach, ICAPCD staff operates a website dedicated to AB 617 activity in Imperial County.[11] The site offers background information on AB 617 and has pages for information on meetings and events (including notes and recordings from past meetings), contact information, and links to important resources such as the CARB home page and websites for local air monitoring networks. Additionally, District staff have

[10] ICAPCD. 2023. AB 617 Imperial North-End Community Steering Committee Charter. Available at: https://imperial.granicus.com/MetaViewer.php?view_id=2&clip_id=2454&meta_id=410977. Accessed: October 2024.

[11] ICAPCD. 2024. AB 617 Imperial County. Available at: https://www.icab617community.org/. Accessed: October 2024.

maintained that they will be available as resources to anyone who has questions or is looking to gather more information about CAPP implementation in Imperial County. Information regarding the dedicated District contact person for this Plan is provided below.

Dedicated ICAPCD Contact Person

Israel Hernandez
Air Pollution Control District Project Manager
Phone: 442-265-1800
Email: israelhernandez@co.imperial.ca.us

The Steering Committee meetings are open to the public. They are advertised via email notifications, as well as flyers posted to the County's website. For those individuals who are unable to attend the meetings but would still like to view them in real time, the Committee livestreams meetings on Facebook as feasible. To enhance public understanding and participation, a professional interpretation service is available at each meeting to provide translation services. In addition, at each meeting ICAPCD staff will serve as the facilitator for the Community and encourage public and Steering Committee engagement. At each meeting, a specific agenda item is included to allow for the public to issue comments. These comments are either addressed during the meeting or included as a discussion point for future meetings. For agenda items requiring more direct input from the Steering Committee or members of the public in attendance, electronic polling is utilized. Appendix C includes sign-in sheets, agendas, minutes, and invitation flyers for each Steering Committee Meeting. Presentation materials from meetings are available at the District's AB 617 website.[12]

Community input received during the Steering Committee meetings has demonstrated the value that collaborating with members of the Community on both the CERP and the CAMP provides to the overall CAPP. Going forward, the Steering Committee will continue to engage with the public through monthly meetings. The flyer notification system has worked well thus far for spreading the word about meetings and promoting attendance, so it will continue to be utilized.

Additionally, the ICAPCD has an established social media presence that they utilize to promote community engagement in matters related to air quality and the AB 617 plans. The District operates multiple social media pages on Facebook,[13] Instagram,[14] and X (formerly known as Twitter)[15] where regular posts are made. These posts are intended to notify the public about important items such as high wind advisories, times when burning is and is not permitted, and daily air quality reports that provide summaries of ambient pollutant measurements recorded at regulatory monitoring stations around the County. Advertisements for upcoming Steering Committee meetings and photos and videos from past meetings are also uploaded onto these social media pages.

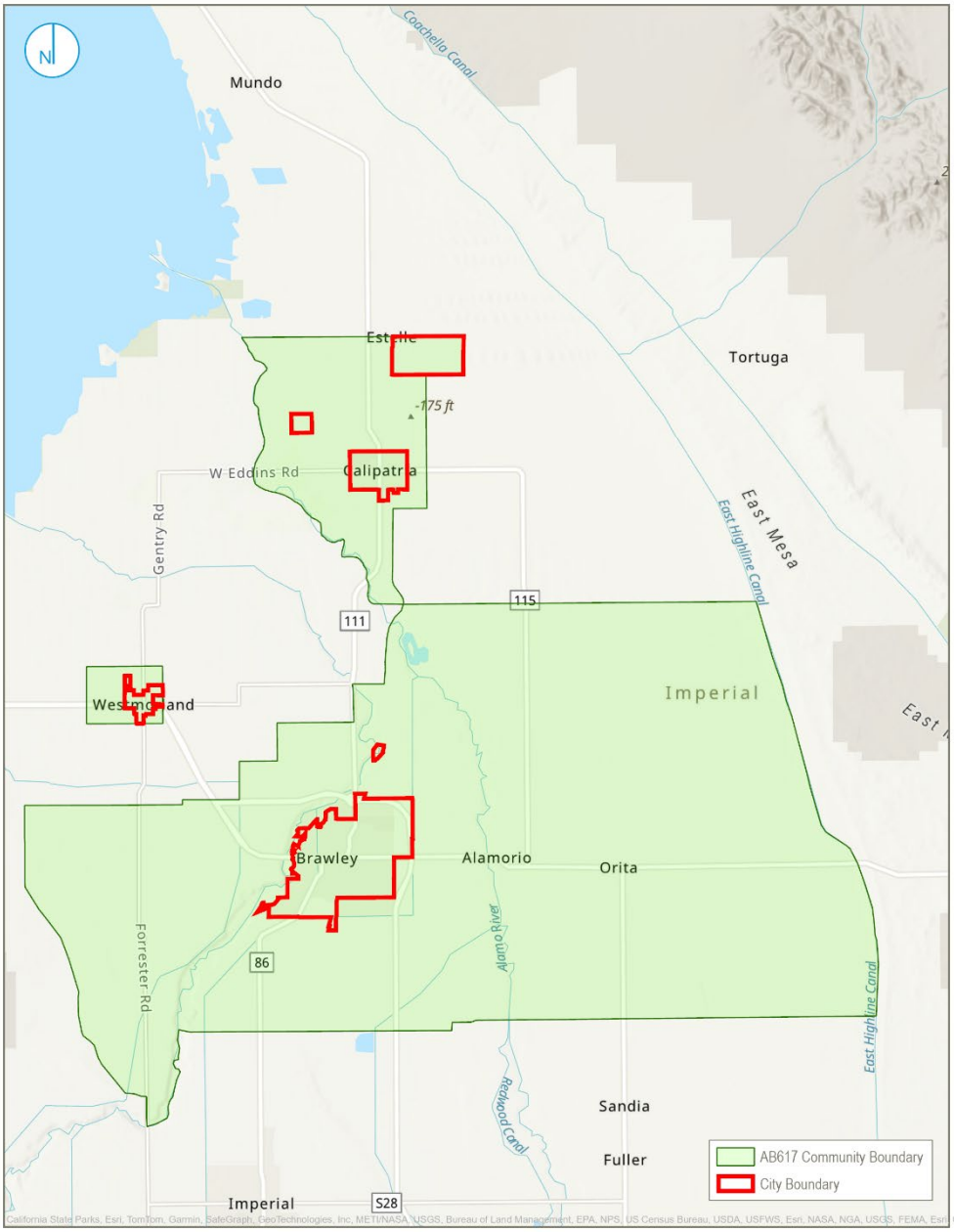
[12] ICAPCD. 2024. AB 617 Imperial County. Available at: https://www.icab617community.org/. Accessed: October 2024.
[13] Facebook. 2024. ICAPCD. Available at: https://www.latest.facebook.com/Countyair/. Accessed: October 2024.
[14] Instagram. 2024. ICAPCD. Available at: https://www.instagram.com/county_air/. Accessed: October 2024.
[15] X. 2024. ICAPCD. Available at: https://x.com/county_air. Accessed: October 2024.

3. Understanding the Community

3.1 Community Profile

Imperial County is located in a primarily desert region of southern California and shares an international border with Mexico. The Imperial Valley runs approximately north-to-south through the center of the County and extends into Mexico. The portion of the valley just south of the Salton Sea contains the North End Phase 1 Community (see Figure 3.1).

Figure 3.1. North End Phase 1 Community



The population of Imperial County is approximately 179,000,[16] while the population in the North End Phase 1 Community is approximately 21% of that or 38,000.

There are no Federally Recognized Tribal Lands located within the boundaries of the North End Phase 1 Community. According to the Bureau of Indian Affairs, the Torres Martinez (Desert Cahuilla Indians) Reservation is the closest tribal land to the North End Phase 1 Community and is located approximately 30 miles northwest of the Community, on the border of Imperial and Riverside Counties[17]. Additional tribal lands in close proximity to the North End Phase 1 Community include the Fort Yuma (Quechan) Indian Reservation approximately 30 miles to the southeast, and the Campo Band of Diegueño Mission Indians Reservation approximately 40 miles to the southwest.

The principal industries in the County include management occupations, retail trade, transportation occupations, agriculture, and construction.[18] The community can experience significant emissions from vehicular traffic, particularly by CA-Highways 78, 86, and 111 as well as dust emissions from unpaved roads. Rest areas in the Community are also a source of emissions from semi-truck idling. Agricultural activities such as burning, farm equipment operation, and pesticide use also contribute to air quality concerns. Furthermore, the receding shoreline of the Salton Sea causes mobilized particulate matter and toxic contaminants to become an air quality concern in the region due to wind-initiated transport of particulate matter from exposed playa[19]. The major air pollutant source types affecting the Community are presented in greater detail in Section 3.2.1.

The local air quality is not only affected by the emissions in the area, but also by the degree to which these pollutants become dispersed in the atmosphere following emission or secondary formation (e.g., of ozone and $PM_{2.5}$). One key factor affecting pollutant dispersion in the Imperial Valley is the degree of stability of the local atmosphere. Weather patterns and air currents dictate the degree of atmospheric stability in a region, which regulates the amount of air exchange or “mixing” that can occur in the air basin. Factors like restricted mixing and low wind speeds are associated with higher atmospheric stability. At times, Imperial County can experience a phenomenon known as a “subsidence inversion” which greatly restricts the vertical mixing of air. This leads to highly stable atmospheric conditions which can cause the stagnation of airflow and buildup of pollutants for days at a time, contributing to exceedances of air quality standards.

[16] United States Census Bureau. 2023. QuickFacts Imperial County, California. Available at: https://www.census.gov/quickfacts/fact/table/imperialcountycalifornia/PST045222. Accessed: October 2024.

[17] Conservation.gov. 2025. US Domestic Sovereign Nations: Land Areas of Federally Recognized Tribes (Bureau of Indian Affairs). Available at: https://www.conservation.gov/datasets/245ffcb63a0b44cb9ed467bbd5f9d7ea_0/explore?location=32.880512%2C-115.107168%2C11.78. Accessed: February 2025.

[18] United States Census Bureau. 2022. Table C24050: Industry by Occupation for the Civilian Employed Population 16 Years and Over. Available at: https://data.census.gov/table/ACSDT1Y2022.C24050?q=C24050:%20Industry%20by%20Occupation%20for%20the%20Civilian%20Employed%20Population%2016%20Years%20and%20Over&g=050XX00US06025. Accessed: October 2024.

[19] ICAPCD. 2019. AB617 North End Nomination. Available at: https://ww2.arb.ca.gov/sites/default/files/2019-11/2019%2010%2023%20ICAPCD%20CCV%20Northend%20Nomination.pdf. Accessed: October 2024.

The North End Phase 1 Community is in an area that is designated as nonattainment for multiple National Ambient Air Quality Standards (NAAQS) according to the most recent air quality data.[20] Specifically, the entirety of Imperial County is in nonattainment for 8-hour O_3, 24-hour $PM_{2.5}$, and annual $PM_{2.5}$. The NAAQS are standards established by the United States Environmental Protection Agency (USEPA) to be protective of human health and welfare. Areas designated as nonattainment are required to develop State Implementation Plans (SIPs) to address the underlying air quality issues and advance air quality improvement measures to attain the NAAQS. As such, the ICAPCD has developed updated SIPs for PM_{10},[21] $PM_{2.5}$,[22] and O_3[23] within the past several years.

One significant conclusion from the 2018 PM_{10} SIP is that the Imperial Valley Planning Area is now in attainment with the NAAQS and therefore, has been redesignated as a maintenance area with the allowance of the Exceptional Event designation for high wind events. In other words, a large portion of PM_{10} emissions in the region originates from windblown dust during meteorological events in which greater-than-average wind speeds stir up large amounts of dust from open areas and the surrounding desert. Similarly, the 2018 $PM_{2.5}$ SIP and 2017 O_3 SIP each describe technical analyses conducted to support that their respective implementation plans would be adequate to attain and maintain the NAAQS in Imperial County if it were not for the transport of emissions originating in Mexico and thus outside the jurisdiction of the District, CARB, and the USEPA. While beneficial, these plans are designed to address air quality issues at the regional level for Imperial County due to NAAQS exceedances of specific CAPs. In section 3-1 of the 2018 SIP for PM_{10} in Imperial County, no additional control measures beyond the existing control strategy are proposed.[24]

In contrast, this Plan, prepared in accordance with AB 617, expands upon previous efforts in the SIPs to specifically focus on the North End Phase 1 Community and air-quality improvement initiatives that are focused on addressing community feedback and concerns.

Aside from understanding the direct air quality burden, it is also essential to review the socioeconomic issues facing the Community to inform development of the Plan. Individuals with existing health ailments and lower socioeconomic status are more vulnerable to health impacts resulting from air pollution.[25] To assess the impacts of environmental and socioeconomic factors

[20] USEPA. 2024. Nonattainment Areas for Criteria Pollutants. Available at: https://www.epa.gov/green-book. Accessed: October 2024.
[21] ICAPCD. 2018. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/sip.pdf. Accessed: October 2024.
[22] ICAPCD. 2018. Imperial County 2018 Annual Particulate Matter Less Than 2.5 Microns in Diameter State Implementation Plan. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/2018-IC-PM25SIP.pdf. Accessed: October 2024.
[23] ICAPCD. 2017. Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/OzoneSIP.pdf. Accessed: October 2024.
[24] ICAPCD. 2018. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/sip.pdf. Accessed: October 2024.
[25] USEPA. 2024. Research on Health Effects from Air Pollution. Available at: https://www.epa.gov/air-research/research-health-effects-air-pollution#:~:text=People%20in%20low%20socioeconomic%20neighborhoods%20and%20communities%20may,contribute%20to%20increased%20health%20impacts%20in%20these%20communities. Accessed: October 2024.

on each census tract in the State of California, OEHHA and the California Environmental Protection Agency (CalEPA) developed a mapping tool called CalEnviroScreen, Version 4.0 (CES4). In CES4, census tracts are ranked statewide and assigned a percentile for various indicators. A high indicator percentile indicates a worse exposure or burden. The CES4 score is then calculated as an all-encompassing score by taking the population burden (average of exposure and environmental effect percentiles[26]) multiplied by the population characteristics (average of sensitive population and socioeconomic factor percentiles.

Table 3.1 summarizes the range and average percentiles for sensitive populations and socioeconomic indicators for the eight census tracts within the North End Phase 1 Community. As shown in Table 3.1, the average percentile in the Community for all listed indicators is above 80, with the exception of low birth-weight infants, educational attainment, and housing burdened low-income household. For all census tracts, the maximum indicator percentile is at least in the 90th percentile except for low birth-weight infants.

Table 3.1. CES4 Percentiles for Census Tracts within the North End Phase 1 Community

Indicator		Indicator Percentile Range		
		Min	Max	Average
Population Characteristics: Sensitive Populations	Asthma	86.76	99.25	95.03
	Cardiovascular disease	79.55	91.65	85.45
	Low birth-weight infants	9.33	82.91	47.22
Population Characteristics: Socioeconomic Factors	Poverty	67.45	97.65	86.89
	Unemployment	96.58	99.52	98.10
	Educational attainment	52.87	92.75	77.18
	Linguistic isolation	62.66	95.33	82.63
	Housing burdened low-income household	8.04	95.64	56.80

Notes:

[a] Indicator percentiles obtained from CalEnviroScreen 4.0 for census tracts 6025010101, 6025010102, 6025010200, 6025010300, 6025010400, 6025010500, 6025010600, 6025010700. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40. Accessed: October 2024.

Additional potential areas of concern related to exposures and environmental effects from pollution include impaired water bodies and exposure to toxic components of pesticides. These and other air pollution burdens are explored further in Section 3.2.1.

[26] Environmental effects component is weighted one-half when combined with the exposures component.

3.1.1 The Salton Sea

The Salton Sea, located on the border of Imperial and Riverside Counties, is the state's largest inland lake (by land coverage). The body of water had existed historically as Lake Cahuilla, cyclically filling and drying, before the modern Salton Sea was formed in the lower basin by the 1905-1907 overflow of the Colorado River. This led to flourishing tourism and agricultural industries, and the Sea's role as a migratory bird habitat. By the 1970's, the rising salinity of the Sea and fertilizer runoff from the nearby agricultural land led to ecological degradation and the decline of the tourism industry.

The Salton Sea has received decreasing amounts of agricultural water runoff, causing significant challenges as the Sea's evaporation exceeds its inflows. The shrinking of the Sea accelerated following the cessation of mitigation flows under the 2003 Quantification Settlement Agreement (QSA), which facilitated the transfer of Colorado River water to fast-growing urban areas.[27] Between 2003 and 2018, the Imperial Irrigation District (IID) provided mitigation flows to the Salton Sea, but since the agreement expired, the lake's water level has fallen by 10 feet, shrinking the Sea's surface area by 38 square miles and exposing dry lakebed, or playa.[28] Exposed playa has become a significant source of airborne dust, while the chemical composition changes lead to "rotten egg" odors of hydrogen sulfide. Dust emissions from the exposed playa, particularly as PM_{10}, are a growing concern for both air quality and public health in the region as it carries toxic remnants of pesticides, metals, and organic components.[29]

Without a sustained source of water, the Salton Sea has become increasingly reliant on mitigation efforts to manage the environmental impacts associated with its decline, and has led to long-term restoration discussions on alternative water sources.[30,31] As with water usage decisions, the restoration of the Salton Sea has existed as a state-level issue since the 1990s, as the Sea and ecosystem deteriorated at an increasingly significant rate. This included the signing of the Salton Sea Restoration Act (SB 277, 2003) to drive restoration efforts and established the unfunded Salton Sea Restoration Fund, although funding concerns delayed action until the mid-2010s.[32,33] Recognizing the environmental and public health risks posed by the retreating Salton Sea, state and local agencies continued efforts to develop long-term strategies to manage dust emissions and protect the ecosystem. Any pathway to aid the recovery of the Salton Sea requires significant political action with regard to water supplies and funding allocation.

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27 Water Education Foundation. Quantification Settlement Agreement. Available at: https://www.watereducation.org/aquapedia/quantification-settlement-agreement. Accessed: October 2024.

28 California Natural Resources Agency. 2021. Salton Sea Management Program. Available at: https://www.epa.gov/sites/default/files/2021-04/documents/rtoc-presentation-salton_sea_management_program-2021-04.pdf. Accessed: October 2024.

29 University of California, Riverside. 2022. Salton Sea dust triggers lung inflammation. Available at: https://news.ucr.edu/articles/2022/12/08/salton-sea-dust-triggers-lung-inflammation. Accessed: October 2024.

30 California Natural Resources Agency. 2014. California Water Action Plan. Available at: https://resources.ca.gov/CNRALegacyFiles/docs/california_water_action_plan/2014_California_Water_Action_Plan.pdf. Accessed: October 2024.

31 State of California Salton Sea Management Program. 2018. Phase I: 10-Year Plan. Available at: https://saltonsea.ca.gov/wp-content/uploads/2020/01/SSMP-Phase-1-10-Year-Plan.pdf. Accessed: October 2024.

32 California Senate Bill No. 277 Chapter 611. 2003. Water: Salton Sea. Available at: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200320040SB277. Accessed: October 2024.

33 Desert Sun. 2017. Salton Sea: A history of broken promises. Available at: https://www.desertsun.com/pages/interactives/salton-sea/timeline/. Accessed: October 2024.

In 2015, the Salton Sea Task Force was established to address these challenges and to develop the Salton Sea Management Program (SSMP).[34,35] The SSMP's Phase I 10-Year Plan (2018-2028) outlines a series of dust suppression and habitat restoration projects across 30,000 acres.[36,37] Beyond this first phase, there is the priority of establishing feasible long-term restoration pathways based on projected water inflows and the SSMP, in coordination with the U.S. Army Corps of Engineers, completed the National Environmental Policy Act (NEPA) process to ensure that these projects meet environmental compliance standards.[38] One example initiative is the Species Conservation Habitat (SCH) Project, which spans 4,110 acres of exposed lakebed and combines dust suppression with ecological habitat creation efforts.[39] As part of the SSMP, the Direct Dust Suppression Action Plan (DSAP) targets a 9,800-acre area along the southeastern edge of the Salton Sea, prioritizing areas based on PM_{10} emissions estimates provided by the IID and incorporates performance monitoring to assess the effectiveness of dust control measures.[40] Since the state is not a significant landowner in the Salton Sea region, collaboration with landowners has been a priority of the Program. While the SSMP's Phase I marks an important step toward stabilizing the Salton Sea, the long-term success of dust mitigation and restoration efforts will depend on the development of sustainable water management strategies.[41]

The IID has also implemented a comprehensive Salton Sea Air Quality Mitigation Program, which integrates various existing air quality initiatives into a single framework. This program includes an Annual Proactive Dust Control Plan, which monitors and adjusts dust suppression measures as necessary to ensure they remain effective. The ICAPCD plays an integral role in targeted air pollution regulation in the region, including the development of the PM_{10} SIP, ensuring compliance with the NAAQS.[42]

Efforts to address dust emissions and restore the Salton Sea have been supported by significant financial commitments from both state and federal governments. A major turning point was the

[34] State of California Salton Sea Management Program. Salton Sea Management Program. Available at: https://saltonsea.ca.gov/program/. Accessed: October 2024.
[35] California Natural Resources Agency. 2021. Salton Sea Management Program. Available at: https://www.epa.gov/sites/default/files/2021-04/documents/rtoc-presentation-salton_sea_management_program-2021-04.pdf. Accessed: October 2024.
[36] California Natural Resources Agency. 2021. Updated Draft Salton Sea Management Program – Phase 1: 10-Year Plan Project Description. Available at: https://saltonsea.ca.gov/wp-content/uploads/2021/03/Updated-Draft-Salton-Sea-Management-Program-Phase-I-10-Year-Plan-Project-Description-March-2021.pdf. Accessed: October 2024.
[37] State of California Salton Sea Management Program. 2018. Phase I: 10-Year Plan. Available at: https://saltonsea.ca.gov/wp-content/uploads/2020/01/SSMP-Phase-1-10-Year-Plan.pdf. Accessed: October 2024.
[38] California Natural Resources Agency. 2021. Salton Sea Management Program. Available at: https://www.epa.gov/sites/default/files/2021-04/documents/rtoc-presentation-salton_sea_management_program-2021-04.pdf. Accessed: October 2024.
[39] Ibid.
[40] State of California Salton Sea Management Program. 2020. Dust Suppression Action Plan. Available at: https://saltonsea.com/wp-content/uploads/2023/03/DustSuppressionActionPlan.pdf. Accessed: October 2024.
[41] The Water Desk. 2021. Long troubled Salton Sea may finally be getting what it most needs: action — and money. Available at: https://waterdesk.org/2021/08/long-troubled-salton-sea-may-finally-be-getting-what-it-most-needs-action-and-money/. Accessed: October 2024.
[42] ICAPCD. 2018. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/sip.pdf. Accessed: October 2024.

2022 allocation of $250 million from the federal Inflation Reduction Act (2022).[43,44] The first award from this allocation was $70 million in 2023 through the Department of the Interior's Bureau of Reclamation. In addition to this federal funding, the State of California has allocated $583 million to support the implementation of the SSMP's dust suppression and habitat restoration projects.[45]

Significant attention has been given to the growing lithium extraction economy in the "Lithium Valley," particularly given the potential economic inflow to the region. Senate Bill 125 (2022) created a tiered tax system for extracted lithium, with the intent to leverage the lithium resources into a funding source to support the Salton Sea and surrounding region.[46,47] In response to the focus on lithium extraction in the region, Imperial County is in the process of developing the "Lithium Valley Specific Plan" to "proactively establish a clear path forward towards an environmentally conscious employment hub, called Lithium Valley, which will assist in meeting the nation's increasing demands for lithium and other minerals present in the Salton Sea Known Geothermal Resource Area"[48]. As part of the Lithium Valley Specific Plan, Imperial County is proposing new land use regulations, new zoning regulations, extensive infrastructure development, and other relevant initiatives[49]. As of February 2025, Imperial County was soliciting feedback from community members and other stakeholders on a draft of the Lithium Valley Specific Plan through a series of workshops and community meetings.[50]

In the most recent legislative cycle, the State approved SB 583, establishing the Salton Sea Conservancy, a new state agency within the Natural Resources Agency to lead efforts in environmental restoration and community and public health efforts in the region.[51] Specifically, the Salton Sea Conservancy is tasked with the implementation and state-level support for the SSMP Phase I and the Long-Range Plan. Currently, Proposition 4 on the November 2024 ballot seeks voter approval for a $10 billion bond for climate resilience projects, which would include

[43] California Natural Resources Agency. 2022. Landmark Agreement Set to Accelerate Salton Sea Projects. Available at: https://resources.ca.gov/Newsroom/Page-Content/News-List/Landmark-Agreement-Set-to-Accelerate-Salton-Sea-Projects. Accessed: October 2024.

[44] Imperial Irrigation District. 2022. IID Board of Directors Special Meeting. Available at: https://www.iid.com/Home/Components/Calendar/Event/3200/44. Accessed: October 2024.

[45] Governor Gavin Newsom. 2023. California Gets $70 Million in Federal Funding to Accelerate Salton Sea Restoration. Available at: https://www.gov.ca.gov/2023/12/08/california-gets-70-million-in-federal-funding-to-accelerate-salton-sea-restoration/. Accessed: October 2024.

[46] California Senate Bill No. 125 Chapter 63. 2022. Public resources: geothermal resources: lithium. Available at: https://legiscan.com/CA/text/SB125/id/2600096. Accessed: October 2024.

[47] California Department of Tax and Fee Administration. 2023. California Lithium Extraction Tax Study. Available at: https://cdtfa.ca.gov/taxes-and-fees/LithiumTaxStudy.pdf. Accessed: October 2024.

[48] Imperial County. 2025. County of Imperial Lithium Valley Specific Plan. Available at: https://imperialcounty.org/wp-content/uploads/2025/02/February25DraftLVSP_combined.pdf. Accessed: February 2025.

[49] Ibid.

[50] Imperial County, California. 2025. More information related to the Lithium Valley Specific Plan Draft and public meetings is available at: https://lithiumvalley.imperialcounty.org/lvsp/. Accessed: February 2025.

[51] California Senate Bill No. 583 Chapter 771. 2024. Salton Sea Conservancy. Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB583. Accessed: October 2024.

$170 million to be allocated to air quality, public health, and the ecosystem around the Salton Sea.[52,53]

3.2 Technical Foundation

A strong technical foundation is necessary to understand the sources of air pollution impacting a community and to provide a means of measuring emission reductions. The technical foundation serves to accomplish the following related to an emission reduction program:

- Establish a baseline understanding of the air pollution challenges in the community.
- Develop a community-level emissions inventory in compliance with CARB's community inventory guidance. Inventory should identify the relative contribution of TAC and CAP emissions from mobile, stationary, and area-wide source categories affecting the community.
- If available, supplement the community-level emissions inventory with existing air quality monitoring data or the best available modeling data.
- Provide comprehensive documentation on the methodologies and data sources used in the technical assessment.[54]
- Monitor the progress of emission reduction efforts in communities chosen for localized emissions reduction initiatives.

These elements of the Plan's technical foundation are explored in the sections that follow.

3.2.1 Existing Cumulative Air Quality Exposure Burden

3.2.1.1 Evaluation of Existing Data

Cumulative air quality exposure burden accounts for exposure to air pollution in combination with the vulnerability of the population. The cumulative air quality exposure burden is evaluated through a set of factors relating to air pollution and socioeconomic status, including:[55]

- Concentrations of pollutants from measurements, air quality modeling, or other information used to quantify exposure to air pollution;
- Density of air pollution sources and magnitude of emissions within the community from mobile and stationary pollution sources;
- Cancer risk estimates based on air quality modeling that characterizes the burden faced by the community;
- Sensitive populations located in close proximity to mobile and stationary emission sources of concern, including roadways;

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[52] California Secretary of State. 2024. Proposition 4. Available at: https://voterguide.sos.ca.gov/propositions/4/index.htm. Accessed: October 2024.
[53] California Legislative Analyst's Office. 2024. Proposition 4. Available at: https://lao.ca.gov/ballot/2024/prop4-110524.pdf. Accessed: October 2024.
[54] AB 617 Recommended Source Attribution Technical Approaches. Available at: AB 617 Recommend Source Attribution Technical Approaches. Accessed: October 2024.
[55] CARB. 2024. High Cumulative Exposure Burden. Available at: https://ww2.arb.ca.gov/capp-resource-center/community-assessment/high-cumulative-exposure-burden. Accessed: October 2024.

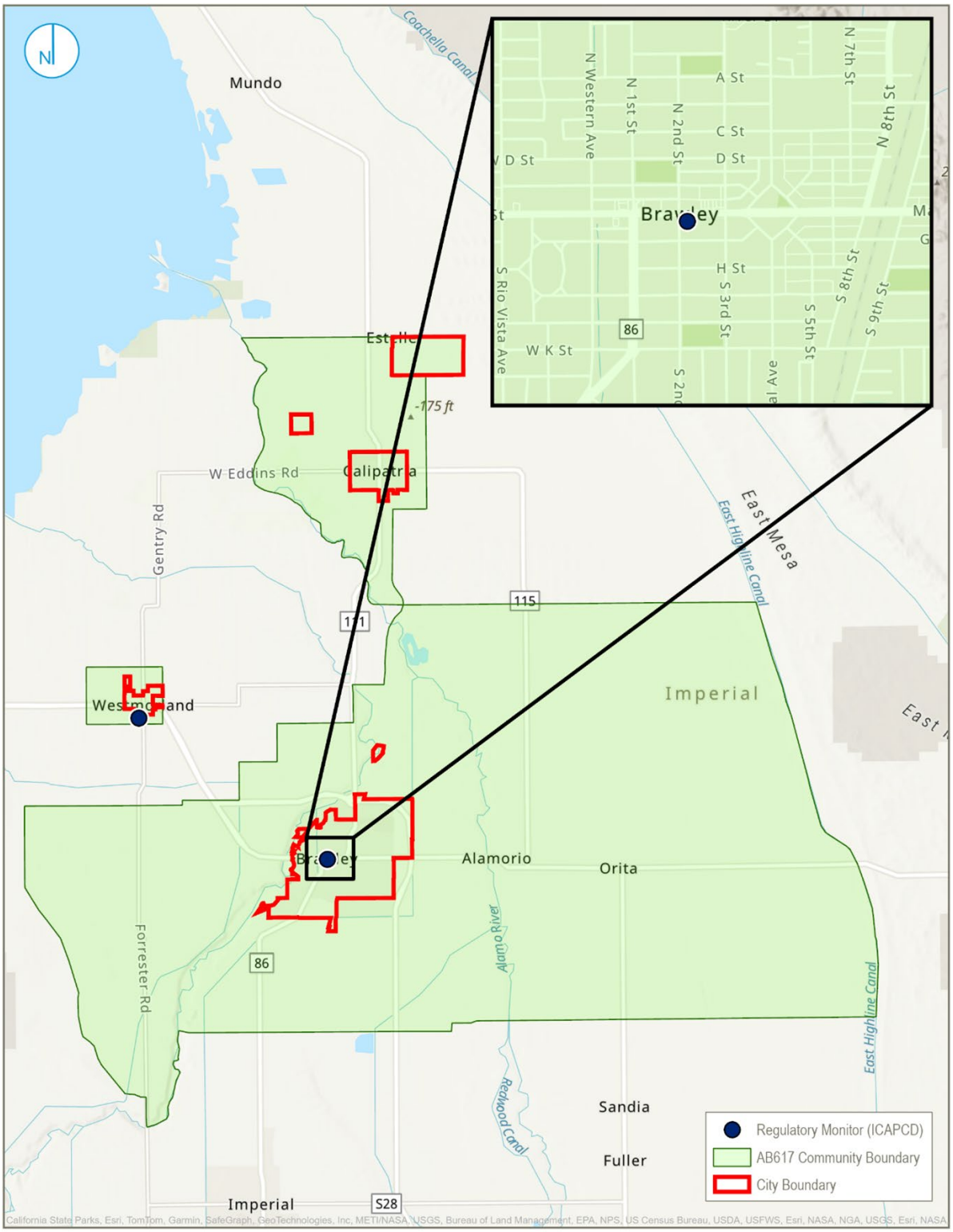
- Public health data that are representative of the incidence or worsening of disease related to air quality; and
- Socioeconomic factors.

As discussed in Section 3.1, certain areas of the Community rank as high as the 99th percentile for socioeconomic factors within the State of California. This section evaluates the existing data from air quality monitors and CES4 indicators for air pollution.

3.2.1.2 Regulatory Monitoring Locations and Data

Existing regulatory monitors within the Community include the Westmorland monitoring station and the Brawley-Main Street #2 monitoring station. Figure 3.2 shows the locations of both regulatory monitors within the Community.

Figure 3.2. Locations of Existing Regulatory Monitors in the North End Phase 1 Community



The Westmorland monitoring station was installed in 1994 and is maintained by ICAPCD. It is located at 570 Cook Street in Westmorland and is below sea level. The monitoring station is surrounded by residential and agricultural areas within 10 meters and 400 meters, respectively, and is the second northernmost station within the Imperial County monitoring network. The Westmorland monitoring station originally monitored for both O_3 and PM_{10}, but in November 2012, the station experienced an electrical fire and the O_3 monitor was placed out of commission until 2015.

The Brawley-Main Street #2 monitoring station was installed in 2003 as a new station, replacing the old station that was installed in 1982, and is maintained by ICAPCD. It is located on top of the Imperial County courthouse located at 220 Main Street and is below sea level. This monitoring station is surrounded by commercial buildings and is the third northernmost station within the Imperial County monitoring network. The city of Brawley is surrounded by agricultural lands to the east, north, and west. The Brawley-Main Street #2 station monitors $PM_{2.5}$ and PM_{10}.

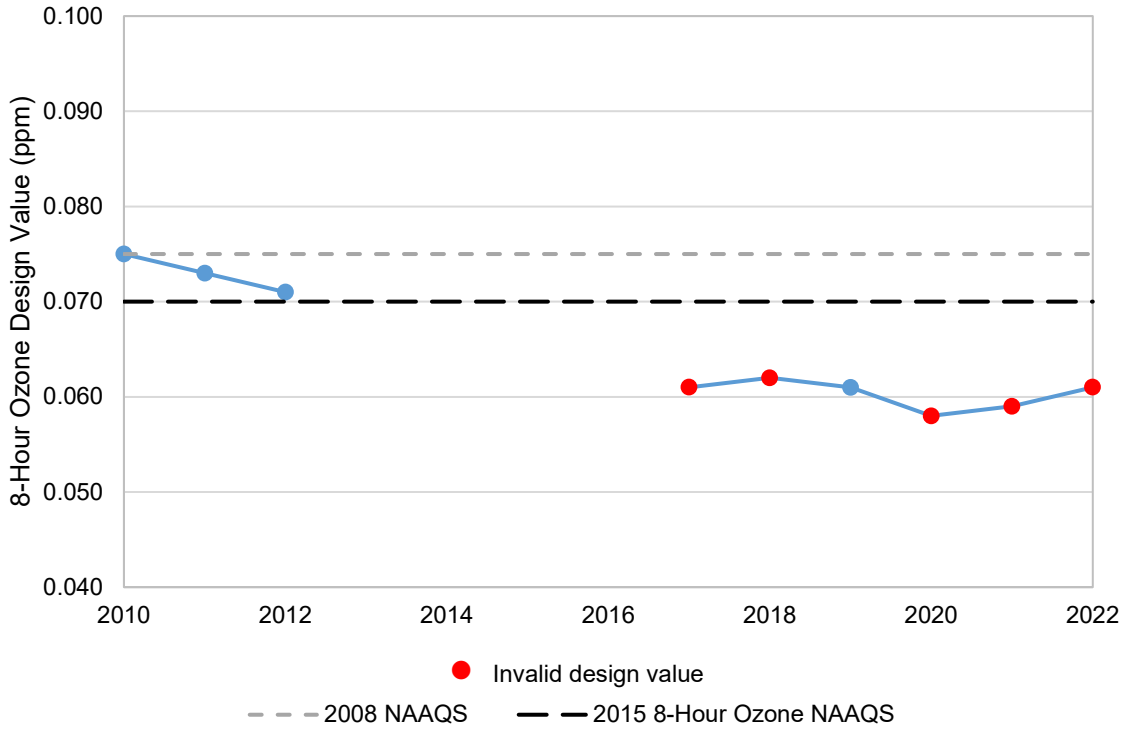
Data from the Westmorland and Brawley-Main Street #2 monitors are validated and used to determine the federal attainment status for Imperial County.[56] The Brawley-Main Street #2 monitoring station features a meteorological sensor that measures temperature, and the Westmorland monitoring station features a meteorological sensor that measures temperature, barometric pressure, wind direction, and wind speed. Since these monitors are used for regulatory purposes, final data are not immediately available; however, preliminary O_3, $PM_{2.5}$, and PM_{10} data are made available to the public through www.imperialvalleyair.org.[57] Additionally, some pollutants are only monitored once every three days or once every six days.

Data from these two regulatory monitors for O_3, $PM_{2.5}$, and PM_{10} are shown in Figures 3.3 through 3.6 and provide a snapshot of recent air quality conditions in Westmorland and Brawley.

[56] There are three additional regulatory monitoring stations in Imperial County that are located outside of the Community. These include the El Centro monitoring station, the Calexico-Ethel monitoring station, and the Niland monitoring station.

[57] Imperial Valley Air Quality. 2024. Current Conditions. Available at: https://www.imperialvalleyair.org/. Accessed: October 2024.

Figure 3.3. Comparison of 8-Hour Ozone Design Values at the Westmorland Monitoring Station to the NAAQS



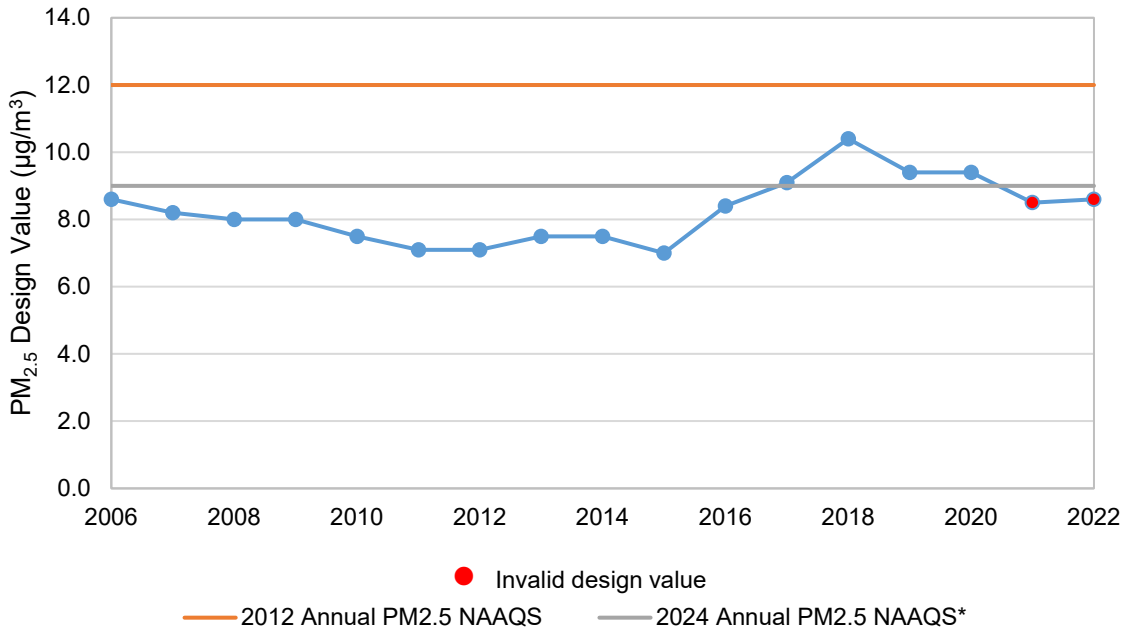
Monitoring data for O_3 at the Westmorland monitoring station indicate that levels have generally decreased since 2010 to values below the NAAQS.[58] Furthermore, the 2017 Ozone SIP for Imperial County demonstrated how international transport of emissions from Mexico of O_3 precursor pollutants contributes to ambient O_3 levels in Imperial County.[59] 2013 to 2016 design values are not available because data is unavailable from 2013 to 2014 due to an electrical fire affecting the monitor. Additionally, design values are considered invalid for 2017, 2018, and 2020 through 2022 due to insufficient data completeness.[60]

[58] The design value for the 8-hour ozone NAAQS is computed as the annual fourth-highest daily maximum 8-hour concentration measured at the monitor, averaged over 3 years. Data obtained from USEPA Air Quality Design Value Reports. Available at: https://www.epa.gov/air-trends/air-quality-design-values. Accessed: October 2024.

[59] ICAPCD. 2017. Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/OzoneSIP.pdf. Accessed: October 2024.

[60] Monitors with design values less than or equal to the level of the NAAQS must have 75% annual data capture and 90% 3-year average data capture in order to be considered valid, as stated in Appendix U to 40 CFR Part 50.

Figure 3.4. Comparison of Annual $PM_{2.5}$ Design Values at the Brawley-Main Street #2 Monitoring Station to the NAAQS



**On February 7, 2024, the USEPA promulgated revisions to the level of the primary annual $PM_{2.5}$ NAAQS to 9 ug/m^3. Area designations will take place within two years (2026).*

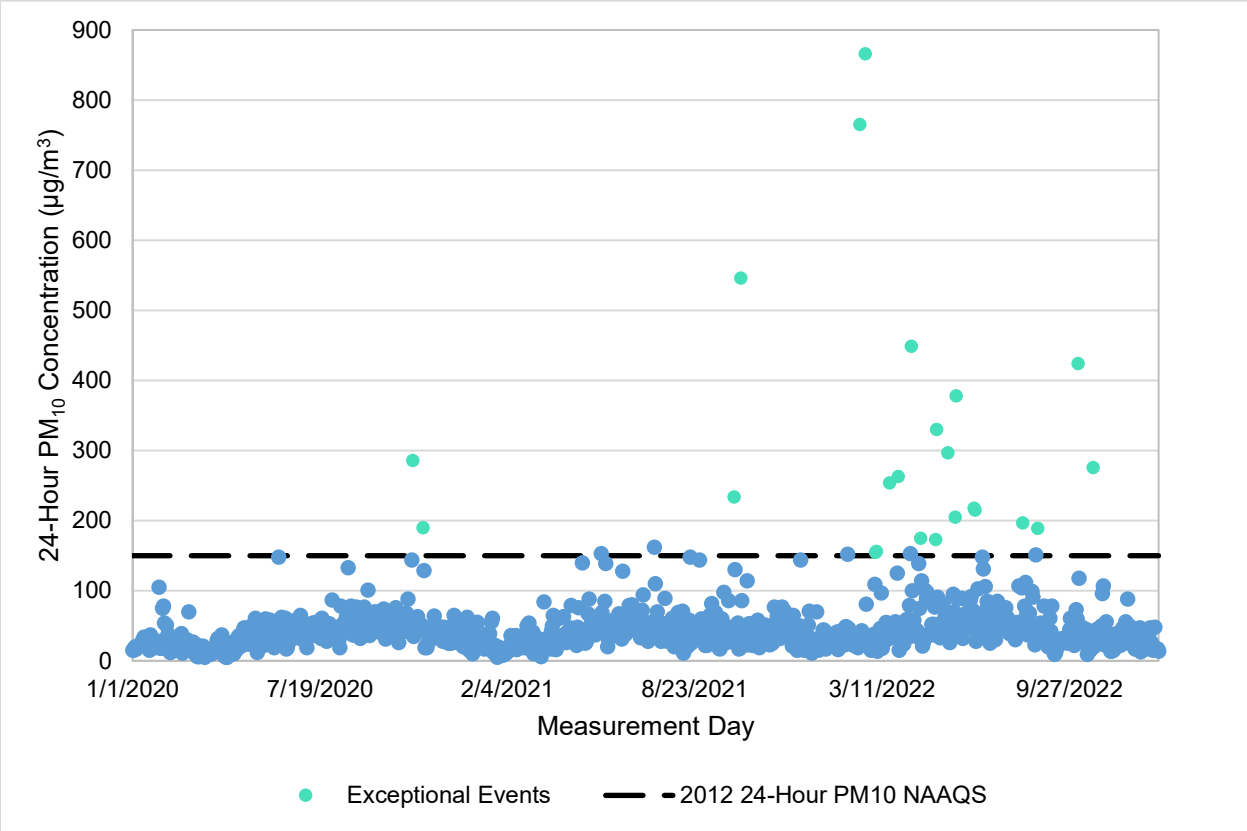
Figure 3.4 displays $PM_{2.5}$ data at the Brawley-Main Street #2 monitoring station and indicates levels below the NAAQS that exhibited a slight downward trend between 2006 and 2011, fluctuations between 2011 and 2015, an upward trend starting in 2015 until 2018, and finally a downward trend starting in 2018 through 2022. [61] By 2019, the annual average concentration had decreased to 8.3 µg/m^3 representing a 10.5% decrease compared to 2016 average concentrations (11.28 µg/m^3). Despite the decrease in recent years, the $PM_{2.5}$ design values (i.e., the annual mean values averaged over three years) for 2021 and 2022 are invalid due to insufficient data completeness. [62] The invalid design value for 2022 is 8.6 µg/m^3 which is the same as the valid design value for 2006. On a county level, $PM_{2.5}$ emissions in the southern part of Imperial County are impacted by the transport of pollution over the border from Mexicali. Other emission sources that contribute to the $PM_{2.5}$ concentrations at Brawley-Main Street #2 include vehicular traffic, unpaved road dust, fugitive windblown dust, farming operations, managed burning and disposal, aircraft, and industrial facilities. Elevated $PM_{2.5}$ concentrations in this region occur most frequently during the winter months when winds are stagnant and during the summer

[61] The design value for the annual $PM_{2.5}$ NAAQS is computed as the annual mean of $PM_{2.5}$ concentrations measured at the monitor, averaged over 3 years. Data obtained from USEPA Air Quality Design Value Reports. Available at: https://www.epa.gov/air-trends/air-quality-design-values. Accessed: October 2024.

[62] Monitors must meet the data completeness requirements stated in Appendix N to 40 CFR Part 50 in order to have a valid design value.

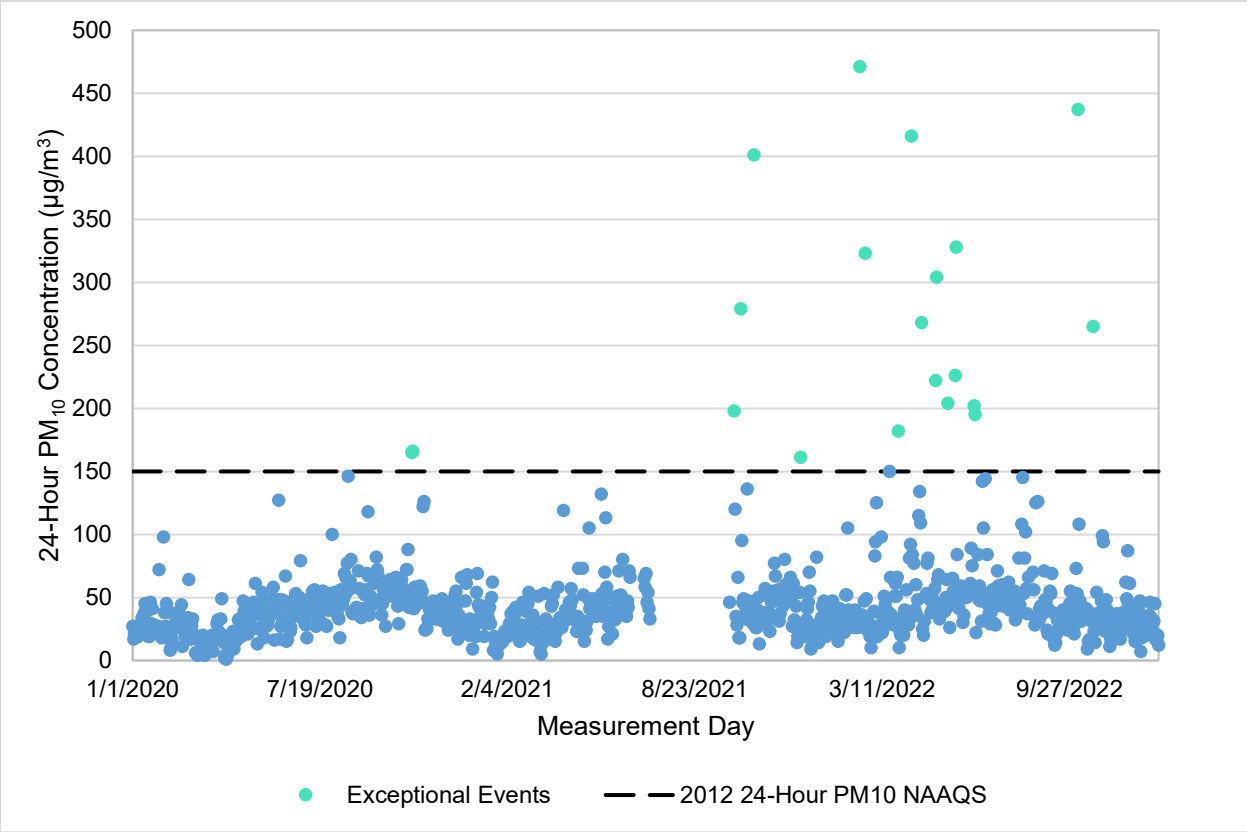
months when winds originate predominately from the southeast, transporting emissions from Mexicali.[63]

Figure 3.5. Comparison of 24-Hour PM_{10} Concentration Measurements at the Westmorland Monitoring Station to the NAAQS



[63] ICAPCD. 2018. Imperial County 2018 Annual Particulate Matter Less Than 2.5 Microns in Diameter State Implementation Plan. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/2018-IC-PM25SIP.pdf. Accessed: October 2024.

Figure 3.6. Comparison of 24-Hour PM_{10} Concentration Measurements at the Brawley-Main Street #2 Monitoring Station to the NAAQS



Figures 3.5 and 3.6 present PM_{10} monitoring data collected at the Westmorland and Brawley-Main Street #2 monitoring stations, respectively.[64] Because the NAAQS for PM_{10} is evaluated based on daily 24-hour time averaged measurements, the plots display data points for each 24-hour measurement collected at the sites from 2020 to 2022. The data shows that on most days, PM_{10} levels are well below the 150 µg/m^3 standard.[65] However, the NAAQS is still exceeded somewhat regularly starting in the latter half of 2021. As discussed in the 2018 PM_{10} SIP for Imperial County for previous exceedances between 2014 and 2016, these exceedances could be attributed to occurrences of high wind activity during exceptional events.[66] If exceptional events are disregarded from consideration, then there was only one exceedance at the Westmorland monitor and no exceedances at the Brawley-Main Street #2 monitor above the µg/m^3 standard during the

[64] USEPA Air Data. 2023. Pre-Generated Data Files. Available at: https://aqs.epa.gov/aqsweb/airdata/download_files.html. Accessed: October 2024.

[65] The 24-hour PM_{10} NAAQS is 150 µg/m^3, which is not to be exceeded more than once per year on average over three years, except during exceptional events. Measurements for daily 24-hour time-averaged measurements are customarily rounded to the nearest 10 µg/m^3 according to USEPA data handling procedures. Therefore, any measurement below 154 rounds down to 150 and thus would not exceed the standard.

[66] ICAPCD. 2018. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/sip.pdf. Accessed: October 2024.

2020-2022 period. The Brawley-Main Street #2 monitor is missing a substantial number of observations in June, July, and August of 2021 which is why there is a gap in data in Figure 3.6.

Air Pollution Burden

Air pollution burden can be used to evaluate the relative impact of pollution sources and emission levels within a community, which is one of the metrics for evaluating the cumulative exposure burden. CES4 evaluates eight pollution burden exposure indicators and five pollution burden environmental effects indicators. Air quality-related CES4 indicators that are relevant to the Community include O_3, $PM_{2.5}$, diesel particulate matter (DPM), pesticide use, and toxic releases from facilities. The O_3 and $PM_{2.5}$ indicators are based on existing data from the CARB air monitoring network. $PM_{2.5}$ data also uses satellite remote sensing data from CARB. The DPM indicator is based on modeled mobile source emissions data from CARB, the EMission FACtors model (EMFAC), and the California Emissions Inventory Development and Reporting System (CEIDARS) database. The pesticide use and toxic release indicators are based on values reported by industrial and agricultural facilities, respectively.[67] Together, these indicators provide useful information on the existing air quality cumulative exposure burden in a given area.

Figure 3.7 presents the burden percentile for each of the air quality-related indicators, as well as the average of these indicators (i.e., "pollution burden") as compared to the State of California. As seen in this figure, the average pollution burden indicator is highest near Brawley, and consistently between the 60th-70th percentiles (on a state level) across the community. The burden for pesticide use is the highest of the individual indicators in the North End with values as high as the 90th-100th percentile in multiple tracts. The other air quality related pollution burden indicators are consistently below the 50th percentile on a state scale throughout the North End community.

Figure 3.8 presents the burden percentiles as compared to only census tracts in Imperial County. This figure shows a similar trend to the statewide percentiles where average pollution burden is elevated close to Brawley with many tracts between the 60th-80th percentile and the pesticide use burden is elevated across the entire community, with some tracts in the 90th-100th percentile range for the county. While many of the tracts are still below the 50th percentile on a county scale, the DPM and $PM_{2.5}$ emissions burden is between the 60th-80th percentile on a county scale near Brawley. The toxics release burden is also between the 60th-70th percentile nearby Calipatria. Many of the tracts that exhibit higher percentiles of pollution burdens in Imperial County are located farther south near the US-Mexico border and could be influenced by sources south of the border.

[67] OEHHA. 2023. CalEnviroScreen 4.0. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40. Accessed: October 2024.

Figure 3.7. CES4 Statewide Burden Percentiles for Air Quality-Related Indicators

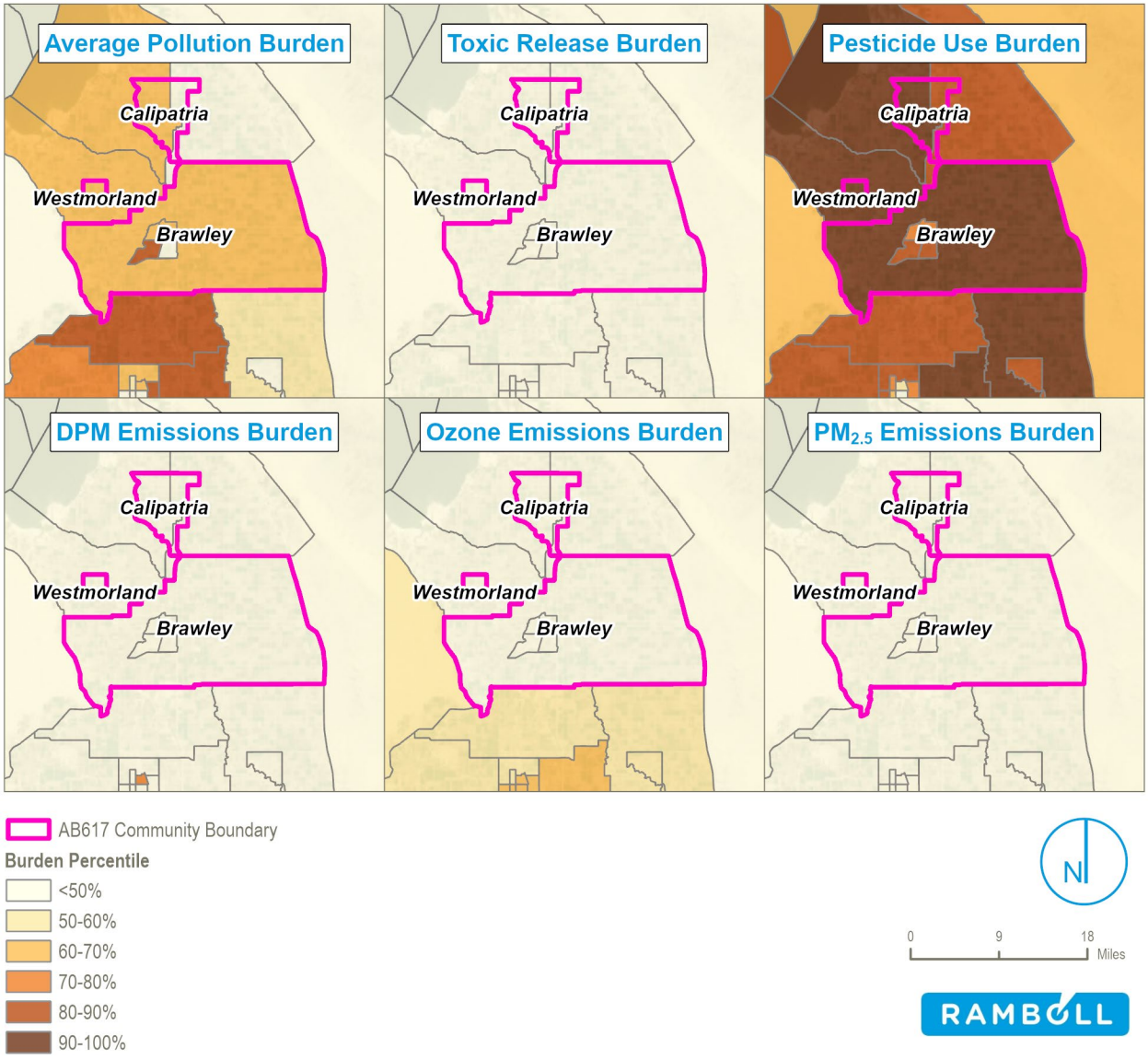


Figure 3.8. CES4 Countywide Burden Percentiles for Air Quality-Related Indicators

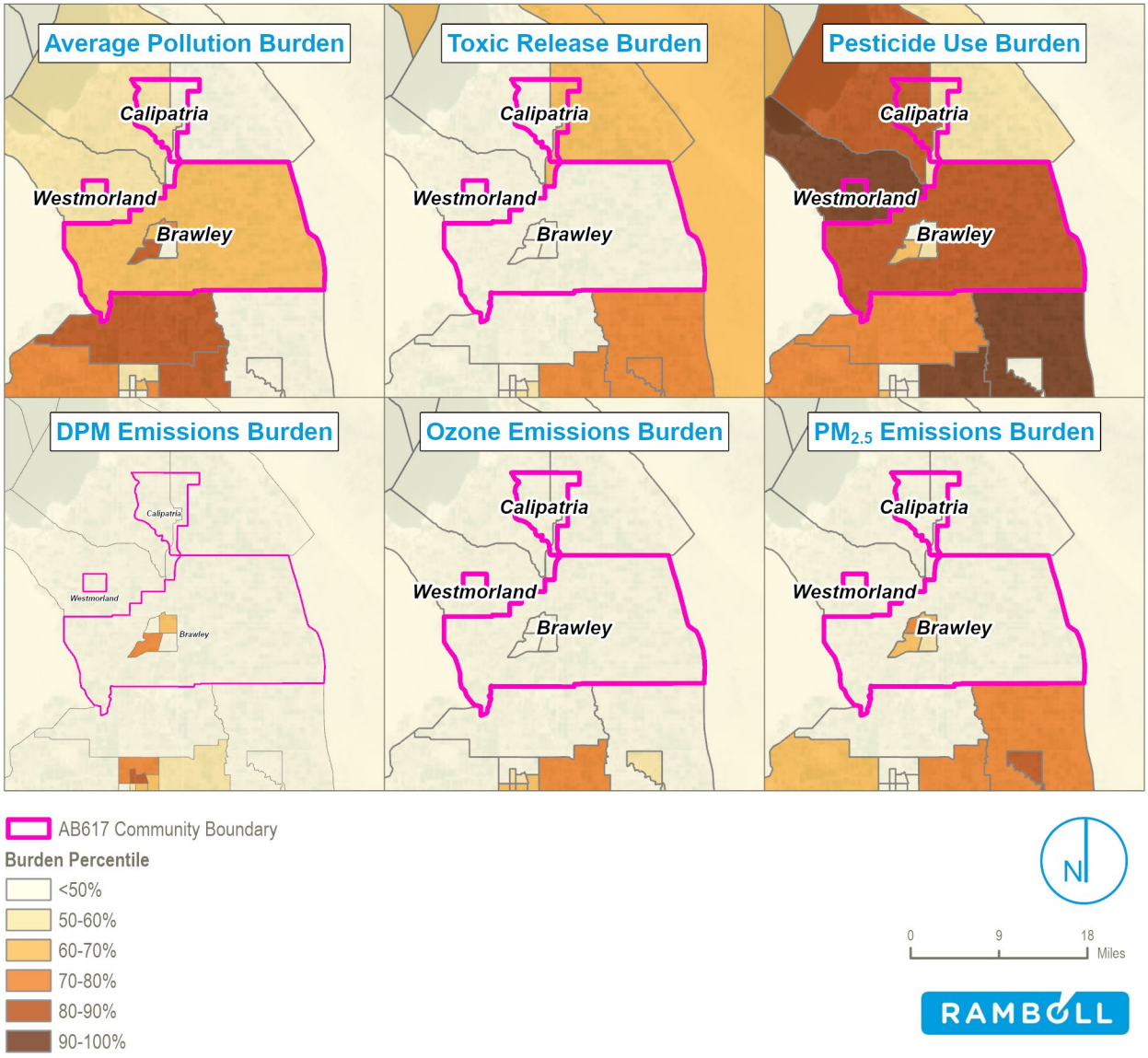


Table 3.2 summarizes the range and average indicator percentile for census tracts within the North End Phase 1 Community. As shown in Table 3.2, there is a high level of variation where some indicators, such as pesticide use and impaired water bodies, have an average greater than the 80th percentile on a state level. Other indicators, such as traffic and toxic releases from facilities, are quite low on a state-scale with average values below the 20th percentile.

Table 3.2. CES4 Statewide Burden Percentiles for Census Tracts within the North End Phase 1 Community

Indicator		Indicator Percentile Range		
		Min	Max	Average
Pollution Burden: Exposures	Ozone	11.60	37.78	27.49
	$PM_{2.5}$	16.33	39.19	31.94
	DPM	5.29	42.82	20.54
	Pesticide use	72.28	92.93	84.84
	Traffic	1.34	35.10	15.71
	Drinking water	30.61	55.55	47.65
Pollution Burden: Exposures	Toxic releases from facilities	7.06	17.14	11.20
Pollution Burden: Environmental Effects	Solid waste sites and facilities	0.00	95.26	64.32
	Cleanup sites	0.00	85.63	59.21
	Groundwater threats	40.84	90.72	67.84
	Impaired water bodies	82.97	99.96	97.55
	Hazardous waste generators and facilities	26.67	93.25	53.43

Notes:

[a] Indicator percentiles obtained from CalEnviroScreen 4.0 for census tracts 6025010101, 6025010102, 6025010200, 6025010300, 6025010400, 6025010500, 6025010600, 6025010700. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40. Accessed: October 2024.

3.2.1.3 Key Air Pollutants and Associated Sources

Agriculture and transportation are two key contributing industries to the economy in Imperial County. Agricultural operations can result in emissions from land management activities (e.g., tilling, burning), concentrated animal feeding operations (CAFOs), off-road equipment (e.g., tractors and pumps), on-road vehicles, and unpaved roads. In addition to the agricultural economy, Imperial County also has industrial energy sources and a significant amount of off-highway vehicle (OHV) activity in the outlying desert/open areas. There are also emissions associated with vehicles idling at rest stops and traveling on local state highways.

In addition to anthropogenic (i.e., "human caused") activities, the area is also susceptible to high wind events, which can lead to elevated concentrations of particulate matter. This is especially a concern given the North End Community's proximity to the Salton Sea. The receding shoreline of the Salton Sea has led to an increase in exposed playa particulate matter that can enter the atmosphere during high wind events. Table 3.3 below summarizes the types of air pollutants generally associated with the sources discussed. A more thorough discussion of the emissions within the Community, specifically in the context of an emissions inventory, is provided in Section 3.2.2.

Table 3.3. Examples of Key Emission Sources in Imperial County and Associated Pollutants

Emissions Source	Associated Pollutants
Agricultural Activities (tilling)	PM_{10}, $PM_{2.5}$
Agricultural Activities (burning)	$PM_{2.5}$
Concentrated Animal Feeding Operations	PM_{10}, $PM_{2.5}$, methane (CH_4), ammonia (NH_3), H_2S
Off-Road Equipment	Combustion By-products[a]
On-Road Vehicles (includes idling)	Combustion By-products[a]
Unpaved Roads	PM_{10}, $PM_{2.5}$
Industrial Energy Production	Combustion By-products[a]
Off-Highway Vehicles / Open Areas	PM_{10}, $PM_{2.5}$
Regional Wind Events	PM_{10}, $PM_{2.5}$
Salton Sea Playa	PM_{10}, $PM_{2.5}$, H_2S
Geothermal Energy Production	PM_{10}, $PM_{2.5}$, H_2S

Notes:

[a] Combustion by-products will vary by fuel type but will generally include carbon dioxide, carbon monoxide, sulfur dioxide, nitrogen oxides, particulate matter, and toxics.

3.2.1.4 Emissions Inventory for North-End Community

This section will discuss the main contributors to emissions (air pollution) and outline the base year (today's available data) and future year emissions inventories for the North End Community. ***An emissions inventory is a systematic listing of the sources of air pollution, and the type and amount of pollutant emission estimates by source, for a specific geographic area during a given time period.*** **Emissions inventories are one of the fundamental building blocks in the development of air quality plans (e.g., State Implementation Plan, CERP), and serve critical functions such as:**

1) **identify pollutants of concern and their sources;**
2) **determine the amount of emissions, distribution, trends;**

3) **input to air quality modeling and health risk assessments for determining air pollutant concentrations and health impacts;**
4) **help identify and prioritize control strategies; and**
5) **help track progress in meeting emission reduction commitments.**

ICAPCD (or District) and CARB jointly developed the community level emissions inventories using reported emissions data for permitted facilities, and best available methodologies and models for areawide (e.g., gas stations, fugitive dust, outdoor cooking) and mobile (e.g., cars, heavy-duty trucks, off-road equipment) sources that are within this community. The emissions inventory includes estimated emissions for criteria air pollutants[68] (e.g., nitrogen oxides, particulate matter) and their precursors (e.g., reactive organic gases (ROG)[69], ammonia), and toxic air contaminants (e.g., diesel PM). It is important to understand that emissions inventories are developed with the best available data, and that the development process is continuous, iterative, and always in a state of improvement as science advances and more robust input data become available. There is an inherent uncertainty and limitation in emission inventories, whether they are based on self-reported emissions from facilities or from estimates calculated using methodologies and models.

Inventory Years Used in the CERP

The CERP uses inventory effective (or base) year and future years consistent with CARB guidance[70] on inventory year(s) selection for AB 617 communities. The effective year or base year inventory presents an accounting of emissions in a recent year and forms the basis for all future year projections and also establishes the emission levels against which progress in emission reductions will be measured.

In addition to a base year inventory, CARB's AB 617 blueprint also requires future year inventory projections for specific milestone years during CERP implementation (fifth and tenth year after the CERP is adopted by the District Governing Board). ***Forecasted inventories are a projection of the base year inventory that reflects expected growth trends for each source category and emission reductions due to already adopted control measures.*** CARB develops emission forecasts by applying growth and control profiles to the base year inventory. Growth profiles for point and areawide sources are derived from surrogates, such as economic activity, fuel usage, population, housing units, that best reflect the expected growth trends for each specific source category. Growth projections were obtained primarily from government entities with expertise in developing forecasts for specific sectors, or in some cases, from econometric models. Control profiles, which account for emission reductions resulting from adopted rules and regulations, are derived from data provided by the regulatory agencies (e.g., air districts, CARB) responsible for the affected emission categories. Projections for mobile source emissions are

[68] USEPA. 2024. Criteria Air Pollutants. Available at: https://www.epa.gov/criteria-air-pollutants. Accessed: November 2024.
[69] By federal approval and precedent, California's emission inventory uses Reactive Organic Gases (ROG) instead of U.S. EPA's Volatile Organic Compounds (VOC), although they are considered essentially interchangeable. ROG, in general, represent a slightly broader group of compounds than those in U.S. EPA's VOC list.
[70] CARB. 2020. AB 617 Community Planning Emission Inventory: Inventory Years. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-07/AB%20617%20Calendar%20Years%20for%20Community%20Planning%20Emission%20Inventories%202020-02-26.pdf. Accessed: November 2024.

generated by models that predict activity rates and vehicle fleet turnover by vehicle model year. As with stationary sources, the mobile source models include control algorithms that account for all adopted regulatory actions.

The baseline emissions inventory for the North-End community, developed based on existing emissions and their future projections, provides information on the current level of emissions and how the emissions change in the future in a "business as usual" scenario. In other words, where the community is starting their journey towards cleaner air. Additionally, it provides a reference to determine emissions reductions from actions and strategies included in the CERP. In other words, assist the District and the CSC to know if progress is being made to reduce pollution in the community and if so, how much pollution is being reduced.

Air Pollutants

There are six criteria pollutants for which U.S.EPA has established National Ambient Air Quality Standards.[71] These include ground level ozone[72], oxides of nitrogen[73], oxides of sulfur[74], particulate matter (PM_{10} and $PM_{2.5}$)[75], carbon monoxide[76], and lead[77]. Additionally, volatile organic compounds (interchangeably ROG in California) and ammonia are considered precursor pollutants that can help form ozone and particulate matter in the atmosphere***. CARB has set California Ambient Air Quality Standards[78] for the same six pollutants, as well as for four additional pollutants (hydrogen sulfide[79], sulfate[80], vinyl chloride[81], and visibility reducing particles[82]). These health-based ambient air quality standards[83] identify outdoor pollutant levels (pollutant concentrations in the atmosphere, not emissions) that are considered safe for the public - including those individuals most sensitive to the effects of air pollution, such as children and the elderly.*** Although there is some variability among the health

[71] USEPA. 2024. Criteria Air Pollutants. Available at: https://www.epa.gov/criteria-air-pollutants. Accessed: November 2024.
[72] CARB. Ozone & Health: Health Effects of Ozone. Available at: https://ww2.arb.ca.gov/resources/ozone-and-health. Accessed: November 2024.
[73] CARB. Nitrogen Dioxide & Health. Available at: https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health. Accessed: November 2024.
[74] CARB. Sulfate & Health. Available at: https://ww2.arb.ca.gov/resources/sulfate-and-health. Accessed: November 2024.
[75] CARB. Inhalable Particulate Matter and Health (PM2.5 and PM10). Available at: https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health. Accessed: November 2024.
[76] CARB. Carbon Monoxide & Health. Available at: https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health. Accessed: November 2024.
[77] CARB. Lead & Health. Available at: https://ww2.arb.ca.gov/resources/lead-and-health. Accessed: November 2024.
[78] CARB. Common Air Pollutants. Available at: https://ww2.arb.ca.gov/resources/common-air-pollutants. Accessed: November 2024.
[79] CARB. Hydrogen Sulfide & Health. Available at: https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed: November 2024.
[80] CARB. Sulfate & Health. Available at: https://ww2.arb.ca.gov/resources/sulfate-and-health. Accessed: November 2024.
[81] CARB. Vinyl Chloride & Health. Available at: https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed: November 2024.
[82] CARB. Visibility-Reducing Particles & Health. Available at: https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed: November 2024.
[83] CARB. 2016. Ambient Air Quality Standards. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-03/aaqs2_0.pdf. Accessed: November 2024.

effects of the six NAAQS pollutants, each has been linked to multiple adverse health effects including, among others, premature death, hospitalizations and emergency department visits for exacerbated chronic disease, and increased symptoms such as coughing and wheezing.

CARB also identifies other air pollutants as toxic air contaminants (TACs), which are pollutants that may cause serious, long-term effects, such as cancer, even at low levels. Most air toxics have no known safe levels, and some may accumulate in the body from repeated exposures. CARB lists over 1,400 pollutants that are subject to reporting as air toxics. Measures continue to be adopted to reduce emissions of air toxics.[13] ***Exposure to TACs can also increases the risk of non-cancer chronic and acute health effects.*** The California Office of Environmental Health Hazard Assessment (OEHHA) establishes threshold concentrations for toxic air contaminants at which exposure is not expected to trigger non-cancer health effects. For carcinogens, OEHHA guidance states that there are no safe exposure thresholds. Examples of air toxics include diesel particulate matter (DPM) which is emitted from diesel engines; metals such as hexavalent chromium; gases such as benzene, toluene, polycyclic aromatic hydrocarbons, dioxins which can be released both as combustion by products and through non-combustion processes.

There are three types of risk that are associated with TAC emissions. Cancer risk is the estimated probability of contracting cancer due to long term exposure to a TAC. Non-cancer risk is determined for TAC that can cause health effects in a short-term exposure (acute) or long-term exposure (chronic). The non-cancer risk is expressed as an index to the Reference Exposure Level (REL), the level at which health effects can be caused from breathing air that contains a TAC (if the index is less than one, the concentration of the TAC is below the REL, and if it is above one, the concentration is above the REL). Non-cancer health effects can include respiratory or reproductive harm resulting from exposure (acute or chronic) to toxic substances. Acute exposure refers to short-term contact (on the order of a few hours) with a toxic pollutant, whereas chronic exposure refers to continuous contact over long periods of time, from months to years.

The baseline emissions inventory for the North-End community includes an assessment of criteria air pollutants[84], their precursors, and TACs.

Air Pollution Sources in the Community

Air pollution affecting the community comes from sources within the community, as well as sources throughout the region. The emission inventory and source attribution analysis developed for this CERP focus on stationary, areawide, on-road mobile, and off-road mobile sources that are within the community boundary. Four major categories are identified in the inventory (Figure 3.9).

[84] Ground level ozone is a regional air pollutant that is formed through complex chemical reactions in the atmosphere between NOx and ROG. It is not emitted directly into the air, unlike $PM_{2.5}$ which can both be directly emitted (primary particles such as road dust, diesel soot, combustion products, and other sources of fine particles), and also be formed in the atmosphere through chemical reactions with NOx, SOx, ROG, and ammonia (secondary particles such as sulfates, nitrates, and complex organic carbon compounds). As such, ozone and secondary $PM_{2.5}$ cannot be directly presented in an emissions inventory.

Figure 3.9. Emissions Inventory Source Categories



- Stationary point sources are sources that can be identified by locations and are often permitted by local air districts. Examples of stationary sources include facility point sources, such as power plants, manufacturing facilities, refineries.
- Areawide sources are those that do not have specific locations and are spread over large areas, such as consumer products and unpaved roads. These can include emissions from water heaters, gas furnace, fireplaces, woodstoves, agricultural operations, cooking as well as evaporative emissions from consumer products such as personal care products, cleaning sprays, paints) architectural coatings).
- On-road mobile sources are moving sources of air pollution such as cars, motorcycles, trucks.
- Off-road mobile sources are moving or movable sources of air pollution such as construction equipment, forklifts, all-terrain vehicles, locomotives, ships).

Community Baseline Emissions Inventory Summary

A good understanding of air pollution sources and emissions is a critical step in the CERP development and future implementation process. A baseline emissions inventory helps prioritize emissions reduction strategies and establishes a reference from which emission reductions from proposed CERP strategies can be evaluated. This section provides a summary of the current emissions scenario in the community using base year 2022 emissions inventory, and a future outlook to gauge how the baseline inventory[85] change during the CERP implementation period.

Base Year Emissions Inventory (2022): A look at the main sources of air pollution in the community.

The main sources of air pollution emissions in the community are from on-road vehicles, off-road equipment, aircrafts, solvent evaporation from certain industrial activities and consumer products, and emissions related to construction and demolition. Table 3.4 below provides a summary of NOx, ROG, $PM_{2.5}$, and Diesel PM base year 2022 emissions in the community.

Table 3.4. 2022 Total Emissions for the North-End Community

Source Category	NOx		ROG		PM2.5		DPM	
Stationary	86	21%	682	47%	86	8%	0.3	3%
Areawide	25	6%	615	43%	1,005	91%	0	0%
Off-Road Mobile	182	45%	80	6%	11	1%	7.3	87%
On-Road Mobile	116	28%	68	5%	3	0.3%	0.8	10%
Total (tons per year)	**409**		**1,445**		**1,313**		**8**	

Mobile sources, both on-road and off-road, account over 70% of the total NOx emissions in the community. Emissions from farm equipment (24%), fuel combustion at stationary sources (17%), off-road equipment (12%), heavy-heavy duty vehicles (11%) are the significant sources of NOx in the community (Figure 3.10).

ROG emissions in the community (Figure 3.11) are dominated by emissions from stationary (47%) and areawide (43%). Food and agricultural processing contribute to 44% of the total stationary ROG emissions; while farming operations (21%) and pesticides/fertilizers (10%) contribute to 31% of the total areawide emissions. Mobile sources are not a significant contributor to ROG emissions in the community.

The largest sources of directly-emitted $PM_{2.5}$ emissions in the community (Figure 3.12) are from fugitive windblown dust (60%), farming operations (11%), and dust from vehicle travel on unpaved roads (10%).

[85] Business-as-usual, without considering effects of any proposed CERP strategies.

Figure 3.10. Sources of NOx in the North-End Community

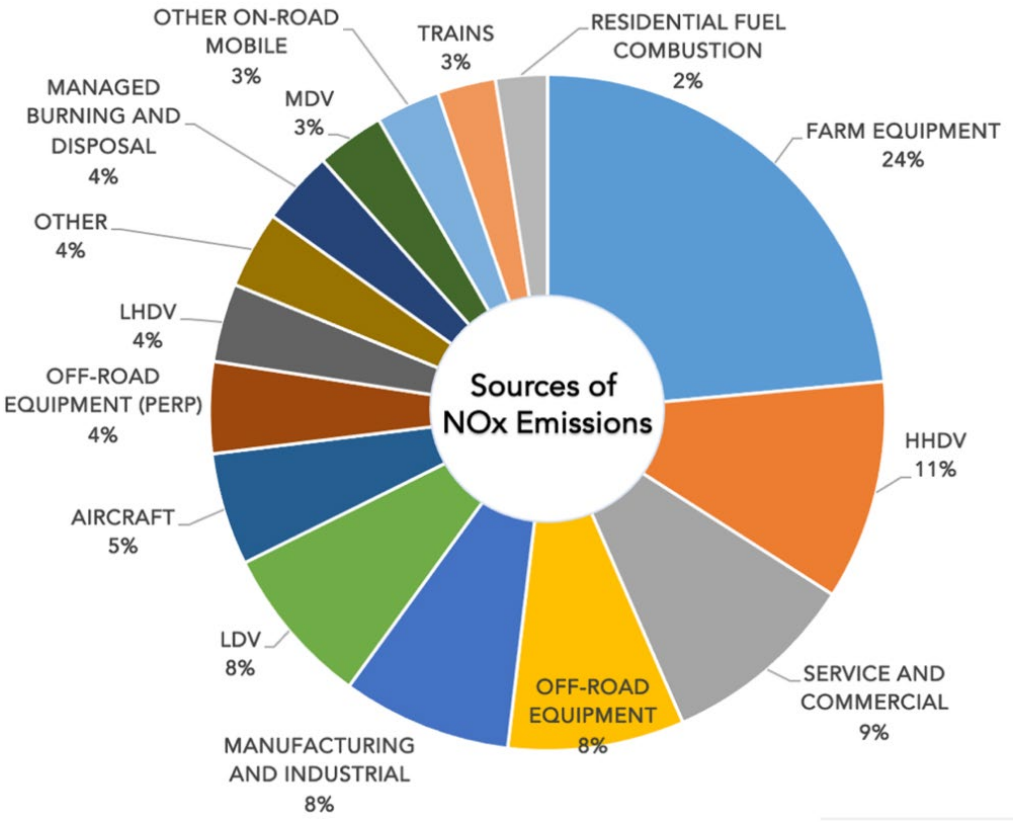


Figure 3.11. Sources of ROG in the North-End Community

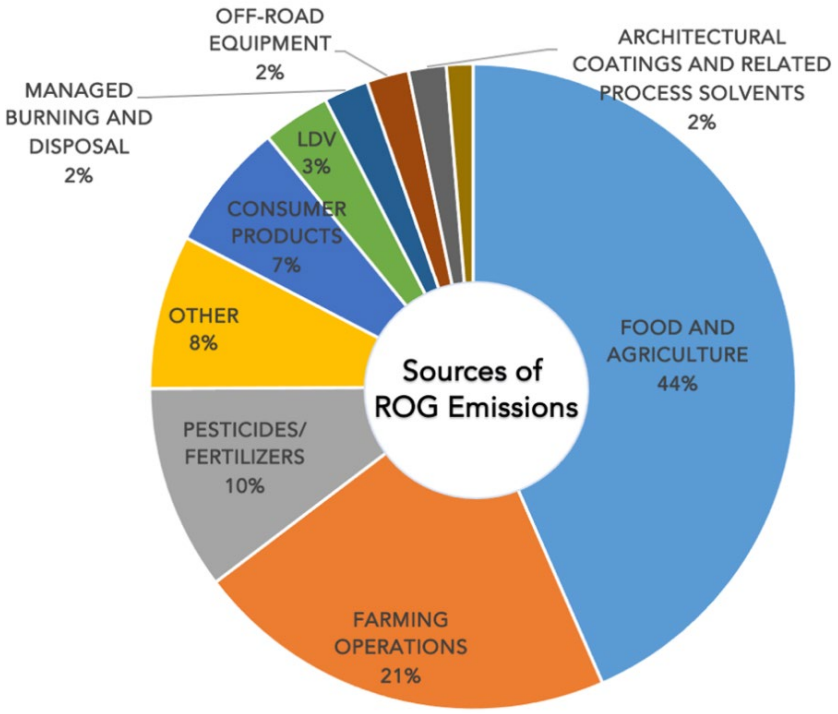
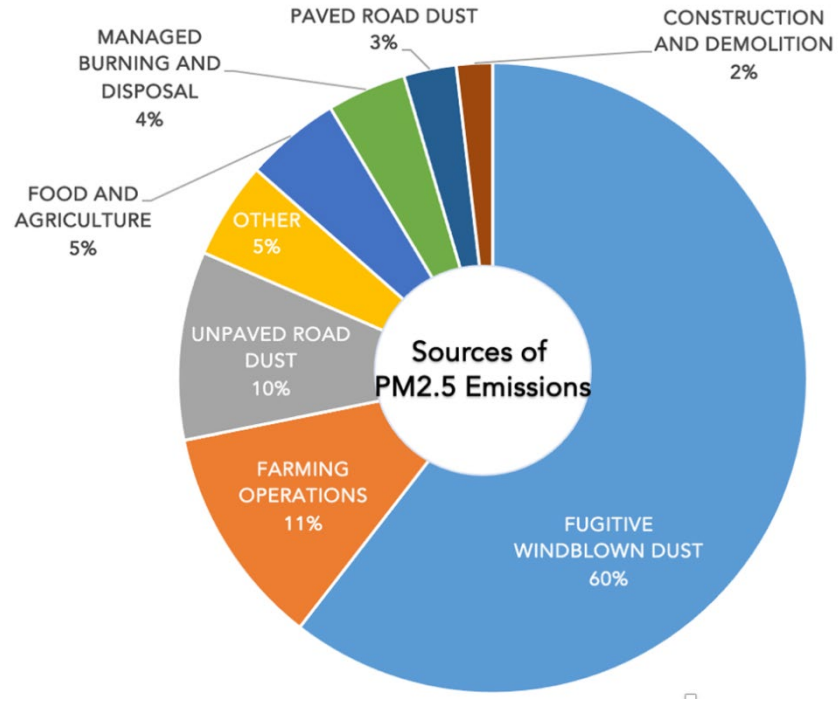


Figure 3.12. Sources of $PM_{2.5}$ in the North-End Community



In the absence of a health risk analysis that encompasses all the TAC emissions within a community, it can be difficult to determine which TACs pose the greatest risks. One way to compare different toxic pollutants is to look at the Toxicity Weighted Emissions (TWE). TWE are adjusted emissions for TACs that adjust emissions using OEHHA approved health values. These are calculated by multiplying the mass emissions of each TAC by the corresponding health values as determined by OEHHA, molecular weight adjustment factors accounting for the molecular weight fraction of a compound associated with the specific health effects, maximum hours of emissions, and normalization factors (these are factors that allow the conversion of different toxic pollutant emissions into a standard to help compare pollutants to one another). TWEs are not risks, but the weighted emissions allow comparison of the contribution of each TAC to the overall toxicity using a consistent scale and help inform which TACs could be prioritized for emissions reduction and/or exposure.

Figures 3.13 through 3.16 present these weighted emissions for the community. The most significant TACs in the community based on this TWE approach using cancer risk health values (Figure 3.13) are cobalt and diesel PM. Diesel PM emissions are dominated by emissions from off-road mobile sources (Figure 3.14). Cobalt is mainly attributable to fugitive windblown dust emissions. For the non-cancer chronic (long-term) TACs (Figure 3.15), the highest toxicity weighted emissions are for manganese and nickel from fugitive windblown dust. The leading weighted emissions for acute (short-term) non-cancer TACs (Figure 3.16) are nickel and ammonia.

Figure 3.13. Relative Comparison of Toxicity Weighted Emissions using Cancer Risk Health Values (Inhalation Only)

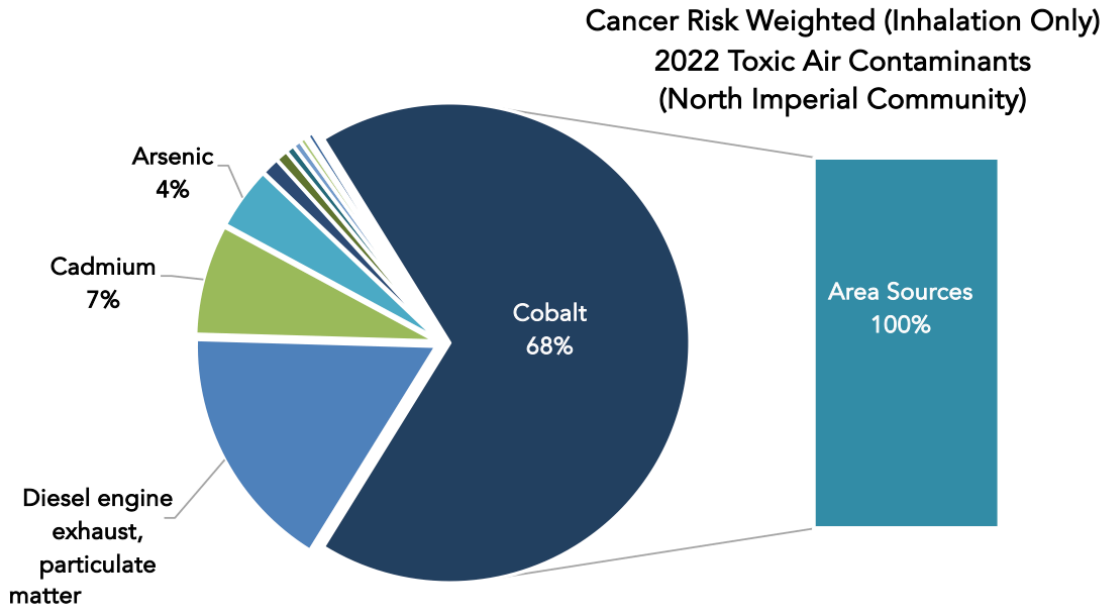


Figure 3.14. Sources of Diesel PM in the North-End Community

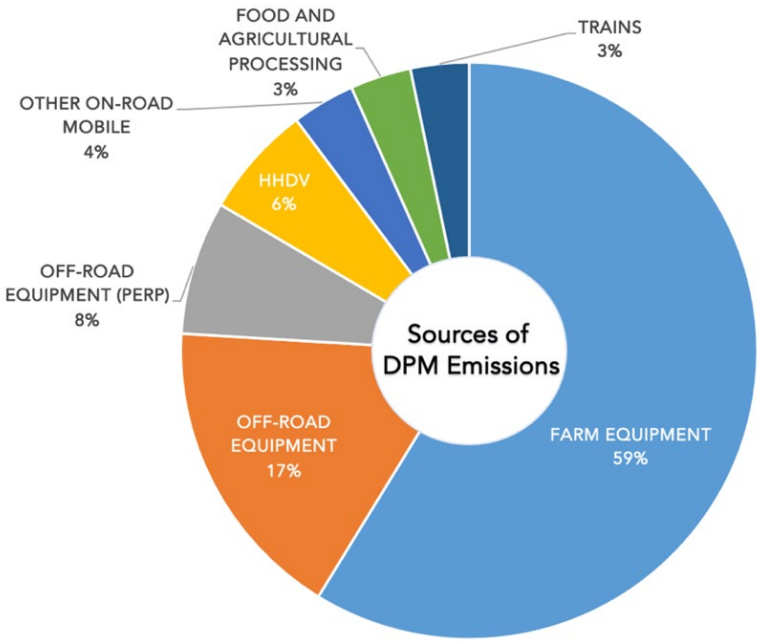


Figure 3.15. Relative Comparison of Toxicity Weighted Emissions using Non-Cancer Chronic Health Values (Inhalation Only)

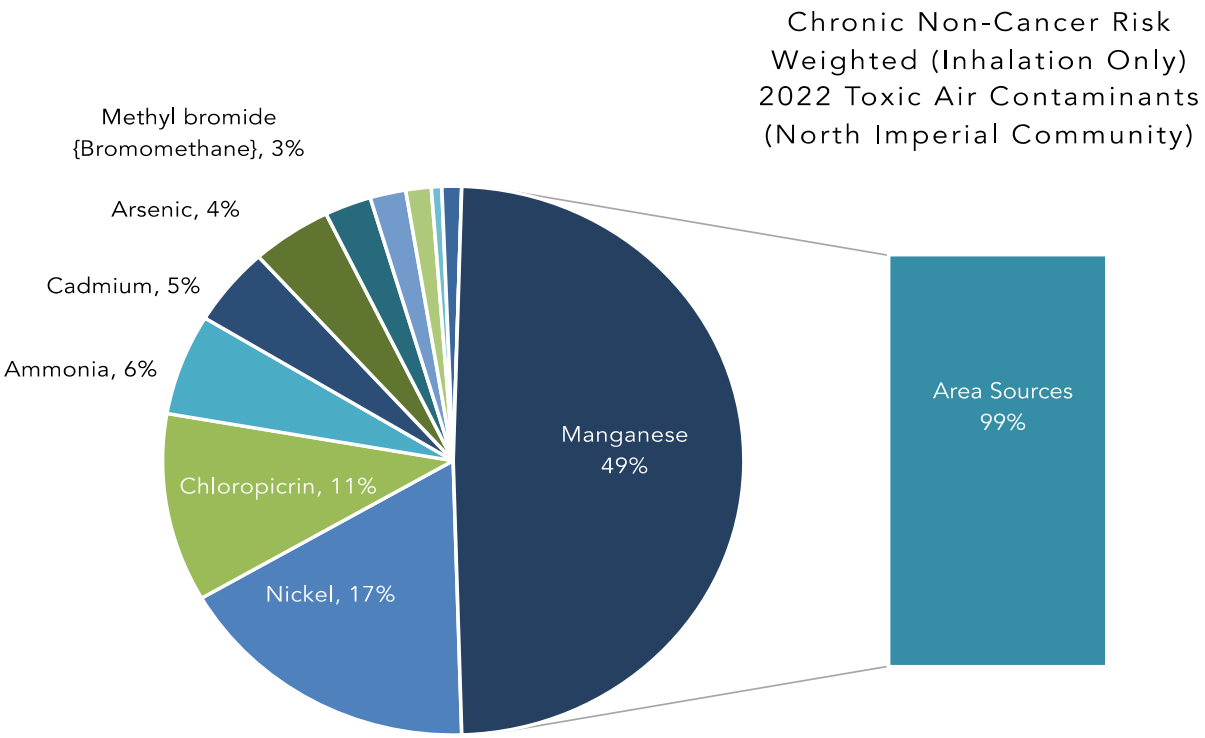
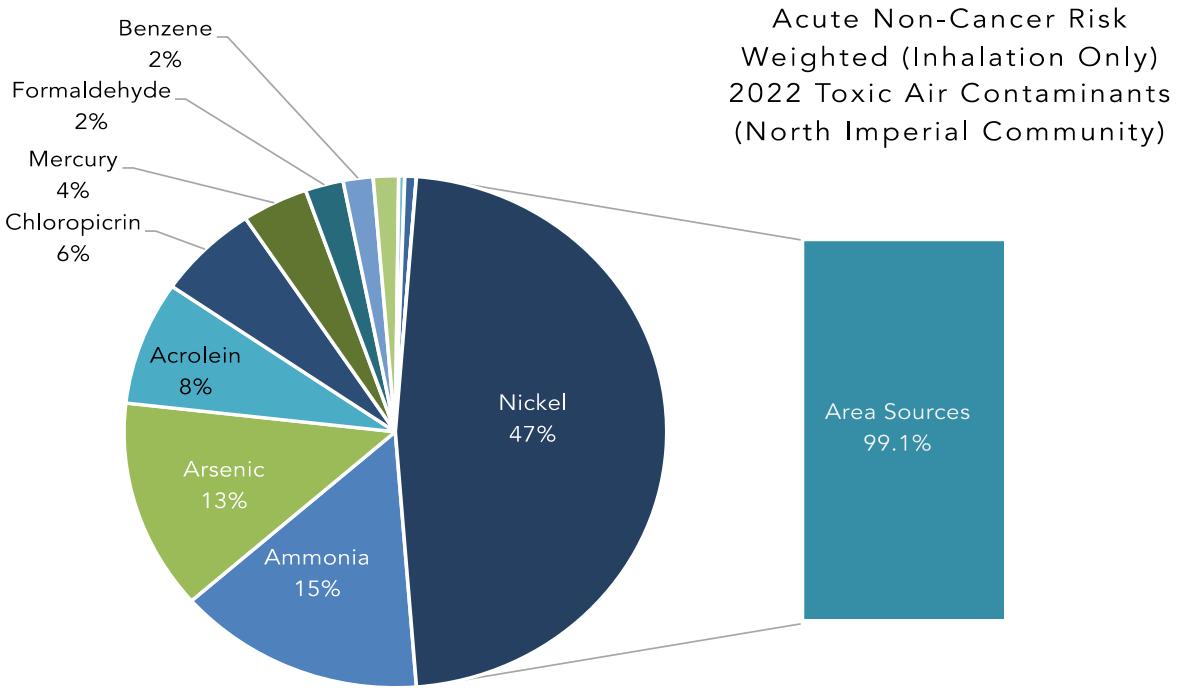


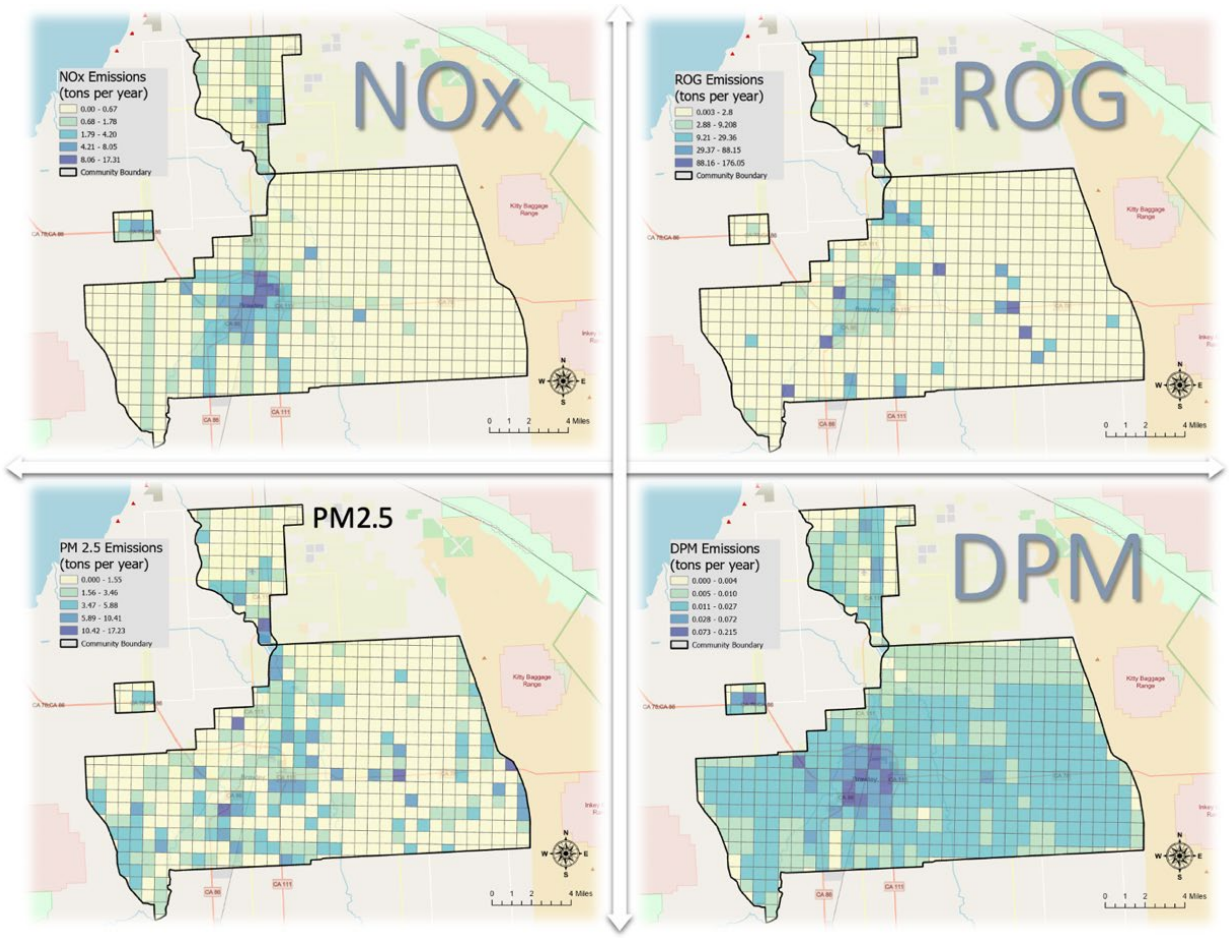
Figure 3.16. Relative Comparison of Toxicity Weighted Emissions using Non-Cancer Acute Health Values (Inhalation Only)



To avoid double counting of risk from constituents that also occur in whole diesel exhaust sources, the TWE analysis for area and mobile sources do not include contribution of individual chemical species that occur from diesel exhaust sources. Some examples of the species that occur in diesel exhaust and could affect those types of detailed analyses include benzene; ethyl benzene; metals such as arsenic, cadmium, chromium, and nickel; various aldehydes; and others.

Figure 3.17 presents the geographic distribution of total NOx, ROG, $PM_{2.5}$, and diesel PM base year 2022 emissions in the community. The dark-colored grids with higher emissions are often concentrated in locations on or near major roadways, farming activities, and other industrial processes. ROG emissions include emissions from food and agriculture processing, farming operations, and pesticides and fertilizer use; while $PM_{2.5}$ emissions include emissions from fugitive windblown dust, unpaved road dust, and off-road equipment. Diesel PM emissions from off-road and on-road sources align with the main transportation corridors, and areas of off-road equipment activity.

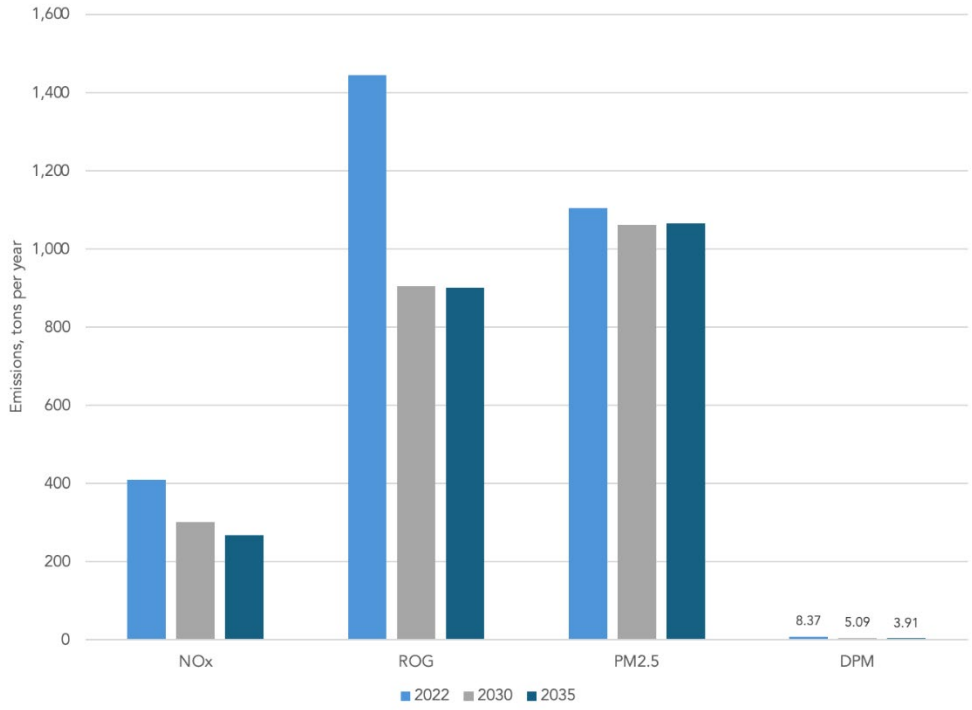
Figure 3.17. Spatial Distribution of Emissions in the Community



Forecasted Emissions Inventory 2030/2035: A look at the baseline emissions inventory during CERP implementation period.

The section summarizes how the emissions inventory is expected to change for the community in the future due to District and CARB rules and regulations. Figure 3.18 show the total base year 2022 and forecasted future year 2030 and 2035 emissions inventories for the community. As described earlier, future emissions in the community are forecasted using best available information representing projected future activity data, population and economic growth economic and emission control related data from the implementation of existing District and CARB regulations. The baseline projections do not take into effect the impacts from regulations that are currently being developed or considered as an emissions reduction strategy in the CERP. The District has several rules which control both criteria and TAC emission from facilities operating in the community. CARB's implementation of several adopted mobile source regulations for both on-road and off-road sources continue to reduce DPM, NOx, ROG and other air pollutant emissions in community. $PM_{2.5}$ emissions remain high in future years as it is dominated by fugitive dust emissions (windblown and unpaved road dust) which are not regulated.

Figure 3.18. Total Emission Trends for NOx, ROG, $PM_{2.5}$ and DPM for 2022, 2030, and 2035



Summary

ICAPCD and CARB have developed a baseline emissions inventory for the North-End community that provides information on the current level of emissions; how emissions change in the future in a "business as usual" scenario; and provides a benchmark to determine emissions reductions from actions included in CERP. For the North-End community, on-road and off-road mobile sources account over 70% of the total NOx emissions, with emissions from farm equipment (24%), fuel combustion at stationary sources (17%), off-road equipment (12%), heavy-heavy duty vehicles (11%) as the significant sources of NOx in the community. Food and agricultural processing contribute to 44% of the total stationary ROG emissions; while farming operations (21%) and pesticides/fertilizers (10%) contribute to 31% of the total areawide emissions. The largest sources of directly-emitted $PM_{2.5}$ emissions in the community are from fugitive windblown dust (60%), farming operations (11%), and dust from vehicle travel on unpaved roads (10%). Off-road mobile sources, with farm equipment at 59%, are the largest source of DPM emissions in the community. DPM is expected to decrease in future years from several already adopted CARB regulations, and proposed CARB regulations will further reduce these emissions. Additional reductions from mobile sources will continue to occur in all California communities from the many statewide proposed CARB regulations that are currently being developed. CARB is updating several emissions estimation methodologies for area sources (e.g., fugitive dust) to reflect current data and science, and will provide updated emissions during implementation.

Methodology and Uncertainties in Emissions Inventories

Emissions were calculated using methods that best collected the activity data, such as product or fuel use, vehicle miles travelled, or population density, that results in the emissions. Stationary source emissions were calculated by using the District's emissions inventory data that was provided by regulated facilities. Area and both off-road and on-road mobile source emissions were estimated through multiple channels, such as fuel consumption tracking, population, and other data, paired with the U.S. Environmental Protection Agency and CARB emission factors for those sources. Population, employment, housing, roads and railways were also considered when determining emission sources and their impact. For the area and both off-road and on-road mobile sources, County information for all the metrics were narrowed down into the emissions study area to determine community emissions (including some areas just outside the community).

Over the years, emission inventories have become more robust, and improvement and updates to emission inventories are continuously made to ensure the most accurate inventory is used for emission focused programs, such as the community emission reduction program. Community-scale emission inventories for stationary, area, and mobile sources are developed using the best and latest available data inputs for estimating and spatially allocating emissions. Emissions from sources are estimated using a variety of inputs, such as activity data, emission factors, data that can be used to aid in understanding community-level issues (i.e., spatial surrogates), future growth and control factors, and pollutant speciation profiles. However, with each input, a level of uncertainty can exist when calculating emissions within a community due to data availability, representativeness, and limitations, and disparity between county or regional level data to community level data in a meaningful manner.

For all sources, activity and emission factors used to calculate emissions might be incomplete, outdated, and not completely represent the current year or community. For example, activity profiles for a pollution source might be developed either based on reported data, survey results, reported studies, or purchased data from previous years and might not accurately represent the current year of an emission inventory. Area and certain off-road mobile source estimates which are based on general methodologies that use regional activity assumptions and generic industry-wide or average emission factors have inherent uncertainties in the estimates. The speciation profiles used to calculate toxic air contaminants are based on information from literature reviews and lab testing and may not always reflect all emission processes and activities resulting in those emissions. Additionally, speciation profiles might not include all toxics emitted from a specific source or in some cases it may include additional toxics compared to the pollutants that are emitted.

Spatially allocating emissions related to area, off-road mobile, and on-road mobile sources within communities can sometimes be difficult due to not having complete and detailed information related to activity location data for some source categories. In this case spatial surrogates which best fit emission activity are developed to allocate county level total emissions to the local level. For example, emission from consumer products is estimated using overall sales data, and spatially allocated within the community using population as a surrogate. Future year emission projections use many assumptions based on industrywide economic forecasts, historical data, adopted regulations etc., making it challenging to project accurate emission estimates even at regional scales, let alone at the community level.

3.2.2 Existing County Policies and Programs

The Clean Air Act regulates air emissions from stationary and mobile sources. Among other things, it authorizes USEPA to establish the NAAQS and directs states to develop state implementation plans to attain and maintain the NAAQS. CARB, in turn, delegates some of this authority to local air districts, such as ICAPCD. California Health and Safety Code (HSC) Section 39002 states that local and regional authorities have the primary responsibility for control of air pollution from all sources other than vehicular sources. This includes the responsibility for permitting, enforcement, collection of emission inventory data, and preparation of air quality plans. In line with its delegated authority, ICAPCD staff has developed internal policies, programs, and rules to reduce air pollution from sources within its jurisdiction. This section discusses the key programs and policies administered by the District that directly impact the air quality in the region and, by extension, the North End Phase 1 Community.

Incentive Programs

Carl Moyer Program

ICAPCD administers CARB's Carl Moyer Program[86] within Imperial County. The purpose of the Carl Moyer Program is to obtain emission reductions of NO_X, PM_{10}, and reactive organic gases (ROG) from heavy-duty vehicles and other equipment operating in California as early and as cost-effectively as possible. The Carl Moyer Program provides financial incentives of up to $95,000 to assist in the purchase of cleaner engine and equipment technologies to achieve emission reductions that are real, quantifiable, and enforceable. ICAPCD makes grants available to qualified applicants. Eligible projects include cleaner on-road trucks, school and transit buses, off-road equipment, agricultural equipment, and lawn mowers.[87] The Carl Moyer Program has been implemented by CARB for the past 26 years and has awarded over $5,000,000 of funding to eligible projects in Imperial County.[88] According to the ICAPCD, 29 off-road equipment projects were complete between 2021-2023.

Table 3.5 presents 2021-2023 emission reductions resulting from the Carl Moyer program.

Table 3.5. Imperial County Emission Reductions from Carl Moyer Program Projects

	NO_X (tpy)	ROG (tpy)	PM (tpy)
2021	0.25	0.04	0.03
2022	5.84	0.65	0.41
2023	10.48	1.13	0.66
TOTAL 2021-2023	**16.58**	**1.82**	**1.09**

[86] ICAPCD. 2024. Carl Moyer Program. Available at: https://apcd.imperialcounty.org/grants/. Accessed: October 2024.

[87] CARB. 2024. Carl Moyer Program Eligible Equipment. Available at: https://ww2.arb.ca.gov/our-work/programs/carl-moyer-program-eligible-equipment-basic. Accessed: October 2024.

[88] CARB. 2023. Carl Moyer Program Statistics. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-10/2021%20Moyer%20Statistics%20ADA1004_0.pdf. Accessed: October 2024.

Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program

ICAPCD currently administers the FARMER Program[89] within Imperial County.[90] The FARMER program provides funding through local air districts for agricultural harvesting equipment, heavy-duty trucks, agricultural pump engines, tractors, and other equipment used in agricultural operations, including zero-emission agricultural utility task vehicles. The purpose of the program is to reduce agricultural sector emissions by providing grants, rebates, and other financial incentives to replace agricultural equipment with cleaner alternatives. The program began in 2017 and CARB provided ICAPCD an initial funding allocation of approximately $1.2 million. To date, the program has funded over $3.7 million in implemented projects in Imperial County.[91] Estimated funding allocations to the ICAPCD for each fiscal year are displayed in Table 3.6, which includes project funding and project implementation costs.

Table 3.6. FARMER Program Funding Allocations in Imperial County

Year	Total Funding
2017 - 2018	$1,190,000
2018 - 2019	$1,150,000
2019 - 2020	$480,000
2021 - 2022	$1,590,000
2022 - 2023	$1,120,000
2023 - 2024	$560,000

In total, 28 off-road equipment projects were completed, with emissions reductions being calculated over a project lifespan of three years.

Table 3.7 presents 2021-2023 emission reductions resulting from the FARMER program.

Table 3.7. Imperial County Estimated Emission Reductions from FARMER Program Projects

	NOx (tpy)	ROG (tpy)	DPM (tpy)	$PM_{2.5}$ (tpy)
2021	27.5	2.78	1.79	1.65
2022	1.02	0.098	0.053	0.049
2023	12.3	1.38	0.85	0.78
TOTAL	40.8	4.26	2.69	2.48

[89] CARB. 2024. FARMER Program. Available at: https://ww2.arb.ca.gov/our-work/programs/farmer-program. Accessed: October 2024.
[90] ICAPCD. 2023. FARMER Program. Available at: https://apcd.imperialcounty.org/grants/. Accessed: October 2024.
[91] CARB. 2023. Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program. Available at: https://ww2.arb.ca.gov/sites/default/files/classic/ag/agincentives/outreach/farmerinfographic-imperial.pdf. Accessed: October 2024.

Lawn Equipment Exchange Program (LEEP)

ICAPCD has been administering the Lawn Equipment Exchange Program (LEEP) for the past 9 years.[92] The program reduces air pollution by allowing residents to turn in working gasoline-powered lawn mowers and similar equipment in exchange for zero-emission alternatives at a discounted price. From 2021 to 2023, ICAPCD exchanged more than 700 pieces of lawn equipment resulting in a total emissions reduction of nearly 1,000 pounds of NO_X and hydrocarbons (HCs). Table 3.8 presents the specific quantities of lawn equipment replaced by the LEEP program between 2021 and 2023.

Table 3.8. Quantities of Lawn Equipment Replaced by the LEEP Program from 2021-2023

Equipment	Quantity		
	2021	2022	2023
EGO 56V Push Mower	41	50	60
EGO 56V Self-Propelled Mower	60	73	60
EGO 56V String Trimmer	57	56	42
EGO 56V Blower	49	42	65
EGO 56V Hedge Trimmer	12	7	--
EGO 56V Chain Saw	20	21	--
TOTAL	**239**	**249**	**227**

Table 3.9 shows the total emissions reductions attributed to the LEEP program from 2021-2023.

Table 3.9. Total Emissions Reductions Due to the LEEP Program from 2021-2023

Pollutant	Estimated Emissions Reduction			
	2021	2022	2023	Total
NOx (lbs)	37.5	44.6	41.2	**123**
NOx (tons)	0.02	0.02	0.02	**0.06**
HC (lbs)	284	293	275	**853**
HC (tons)	0.14	0.15	0.14	**0.43**
Total Equipment	239	249	227	**715**

[92] ICAPCD. 2024. 9th Annual Lawn Equipment Exchange Program. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2024/03/2024-LEEP-AD-UPDATED.pdf. Accessed: October 2024.

NOx Remediation Measures

CARB's Low Carbon Fuel Standard (LCFS) was originally adopted in 2009 and targets reductions in greenhouse gases through reducing the carbon intensity of transportation fuels in California by providing a range of low-carbon and renewable alternatives.[93] In implementing the LCFS, CARB identified that the use of biomass-based diesel fuel may have resulted in increased NO_X emissions. CARB committed to remediate potential increases in NOx emissions through a Voluntary NOx Remediation Measure (VNRM) grant program.[94] The VNRM program supports air-district level NOx mitigation projects that target engines.

Although ICAPCD was previously awarded funding for a project in the South End, no funding has been pursued or awarded within the North End community in 2021, 2022, or 2023. The VNRM grant does remain a viable option for funding going forward if the need to fund an appropriate project arises.

Proposition 1B – Goods Movement Emission Reduction Program (GMERP)

Proposition 1B, GMERP, is a partnership between CARB and local agencies, including air districts and seaports, to reduce air pollution emissions and health risks from diesel exhaust that are created by freight movement along California's trade corridors.[95] For the purposes of the GMERP, Imperial County is within the San Diego/Border Trade Corridor; thus, the San Diego Air Pollution Control District currently administers the program on behalf of the ICAPCD.[96] This program has been in effect in ICAPCD for five funding cycles, starting in 2010. Between 2021-2023, no trucks were replaced within the North End Phase 1 community as a result of this program. Regardless, the GMERP Program could be used in the future to assist with replacing or retrofitting trucks.

Targeted Airshed Grants (TAG)

The Targeted Airshed Grants program assists local, state, and tribal air pollution control agencies with developing plans and conducting projects to reduce air pollution in nonattainment areas that USEPA determines are among the top five most polluted areas relative to ozone, annual average fine particulate matter ($PM_{2.5}$), or 24-hour $PM_{2.5}$ NAAQS. The overall goal of the Targeted Airshed Grant program is to reduce air pollution in the nation's nonattainment areas with the highest levels of ozone and $PM_{2.5}$. Congress authorized this program in 2010 and has funded this program every year since 2015.[97] The ICAPCD received two TAGs in 2020 and 2021, which provided over $6.8 million in funding to finance the paving of previously unpaved alleyways.[98] This infrastructure

[93] CARB. 2024. Low Carbon Fuel Standard. Available at: https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard. Accessed: October 2024.
[94] CARB. 2024. Case-by-Case Determinations: Project Co-Funding. Available at: https://ww2.arb.ca.gov/case-case-determinations-project-co-funding. Accessed: October 2024.
[95] CARB. Proposition 1B: Goods Movement Emission Reduction Program. Available at: https://ww2.arb.ca.gov/our-work/programs/proposition-1b-goods-movement-emission-reduction-program. Accessed: October 2024.
[96] CARB. 2015. Proposition 1B: GMERP Final 2015 Guidelines for Implementation. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-07/Final%20Prop.%201B%20June%202015%20Guidelines%20ADA%20Version%202020.pdf. Accessed: October 2024.
[97] USEPA. Targeted Airshed Grants Program. Available at: https://www.epa.gov/air-quality-implementation-plans/targeted-airshed-grants-program. Accessed: October 2024.
[98] USEPA. Targeted Airshed Grant Recipients. Available at: https://www.epa.gov/air-quality-implementation-plans/targeted-airshed-grant-recipients. Accessed: October 2024.

upgrade was strategically planned with the objective of substantially curtailing the emissions of particulate matter, thus contributing to air quality improvements in the region.

Supplemental Environmental Projects (SEPs)

The CARB Supplemental Environmental Project (SEP) Policy allows community-based projects to be funded from a portion of the penalties received during settlement of enforcement actions.[99] The funding received from SEPs can go to projects that improve public health, reduce pollution, increase environmental compliance, and bring public awareness to neighborhoods most burdened by environmental harm. Proposed SEP projects must relate to the violation, not benefit the violator, reduce direct/indirect air emissions or exposure to air pollution, and go above and beyond regulatory requirements.

According to CARB, multiple SEPs have been funded within Imperial County as of 2022:[100]

- Over $1,000,000 in funding was awarded to the Brawley Health ACTION Environmental Study focused on mitigating VOCs and addressing community concerns in Brawley.
- Over $650,000 was awarded to ICAPCD to fund the Installation of School Air Filtration Systems in the South End communities of Calexico and El Centro.

Recent updates to the SEP Policy have placed an increased emphasis on projects within, or that benefit disadvantaged communities. As of April 2024, none of the available projects that qualified for financial support under the SEP Policy are under the jurisdiction of the ICAPCD.[101]

Additional Incentive Programs

The following incentive programs have been considered by the District or implemented in the past, but are not currently being implemented:

- *Lower-Emission School Bus Program*: This CARB program provides grant funding for new lower-emission school buses, as well as retrofit equipment for diesel school buses.[102] The District is currently considering options for using this program in the future.
- *Woodsmoke Reduction Program*: The Woodsmoke Reduction Program is administered by CARB and offers financial incentives for homeowners to replace wood stoves, wood inserts, or fireplaces with cleaner burning, more energy efficient devices.[103] ICAPCD has not yet participated in this program but may consider doing so in the future.

[99] CARB. 2024. Supplemental Environmental Projects. Available at: https://ww2.arb.ca.gov/our-work/programs/supplemental-environmental-projects-sep/about. Accessed: October 2024.
[100] CARB. Funded SEPs 1/18/22. Available at: https://ww2.arb.ca.gov/sites/default/files/2022-01/funded_seps_1_18_2022.pdf. Accessed: October 2024.
[101] CARB. 2024. Eligible SEP List. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-04/Eligible%20SEPs_04222024.pdf. Accessed: October 2024.
[102] CARB. 2024. Lower-Emission School Bus Program. Available at: https://www.arb.ca.gov/msprog/schoolbus/schoolbus.htm. Accessed: October 2024.
[103] CARB. 2024. Woodsmoke Reduction Program. Available at: https://ww2.arb.ca.gov/our-work/programs/residential-woodsmoke-reduction/woodsmoke-reduction-program. Accessed: October 2024.

Non-Incentive Programs

Smoke Management Program

California HSC Section 41850 authorizes local air districts to reasonably regulate, but not prohibit, agricultural burning.[104] Furthermore, California HSC Section 41856 required CARB to develop guidelines for the regulation and control of agricultural burning for each air basin in the state. Sections 80100 through 80330 of Title 17 of the California Code of Regulations ("Title 17") were developed to provide smoke management guidelines for agricultural and prescribed burning.[105] In accordance with Title 17, ICAPCD developed a Smoke Management Program (SMP), which addresses the relevant agricultural burning regulations, as well as applicable ICAPCD policies such as District Rule 701.[106, 107] The objective of the SMP is to employ smoke management techniques on all agricultural burning projects to prevent smoke impacts to communities and sensitive receptors in Imperial County. The SMP identifies ICAPCD smoke management and forecasting resources, as well as procedures for burn registration, smoke management planning, and obtaining burn permits. It also provides guidelines for consideration of smoke sensitive areas and alternatives/incentives for not burning.

ICAPCD submits an annual burn report to CARB in compliance with Title 17 Section 80130, which must include the amount (tonnage or acreage) and type of crops burned during the previous calendar year.[108] These reports suggest that there have been significant reductions in burning in Imperial County. ICAPCD has reduced the total agricultural acres burned from 66,790 acres in 2009 to 10,272 acres in 2023, representing an 85% reduction.[109] Part of this success can be attributed to farmers utilizing the Agricultural Burning Emission Reduction Credit (ABERC) program instead of burning fields. As shown in Figures 3.19 and 3.20, since 2015, the number of acres participating in the ABERC program has been larger than the number of acres burned.

[104] California Health and Safety Code. 2009. Section 41850-41866: Article 3 Agricultural Burning. Available at: https://law.justia.com/codes/california/2009/hsc/41850-41866.html#:~:text=41850.,regulated%20and%20not%20be%20prohibited. Accessed: October 2024.

[105] CARB. 2024. Agricultural and Prescribed Burning. Available at: https://ww2.arb.ca.gov/our-work/programs/agricultural-prescribed-burning/about#:~:text=CARB's%20responsibilities%20for%20the%20agricultural,all%20facets%20of%20the%20program%2C. Accessed: October 2024.

[106] ICAPCD. 2010. ICAPCD Smoke Management Program. Available at: https://ww2.arb.ca.gov/sites/default/files/2021-06/ImperialCountySMP.pdf. Accessed: October 2024.

[107] ICAPCD. 2002. Rule 701: Agricultural Burning. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2020/05/1RULE701.pdf. Accessed: October 2024.

[108] California Code of Regulations. 2001. Title 17, Subchapter 2, 80130: Burning Report. Available at: https://ww2.arb.ca.gov/sites/default/files/2021-06/Title17.pdf. Accessed: October 2024.

[109] ICAPCD. 2024. Compliance. Available at: https://apcd.imperialcounty.org/compliance/#agburning. Accessed: October 2024.

Figure 3.19. Total Agricultural Acres Burned in Imperial County, 2009-2023

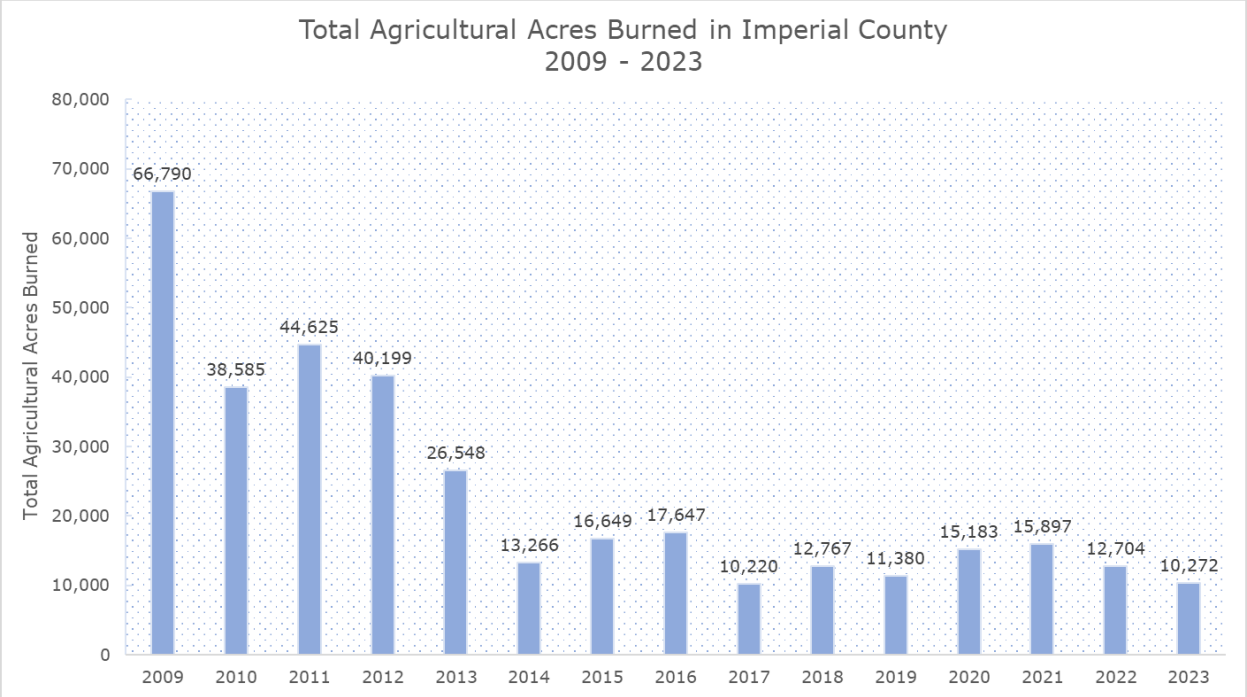
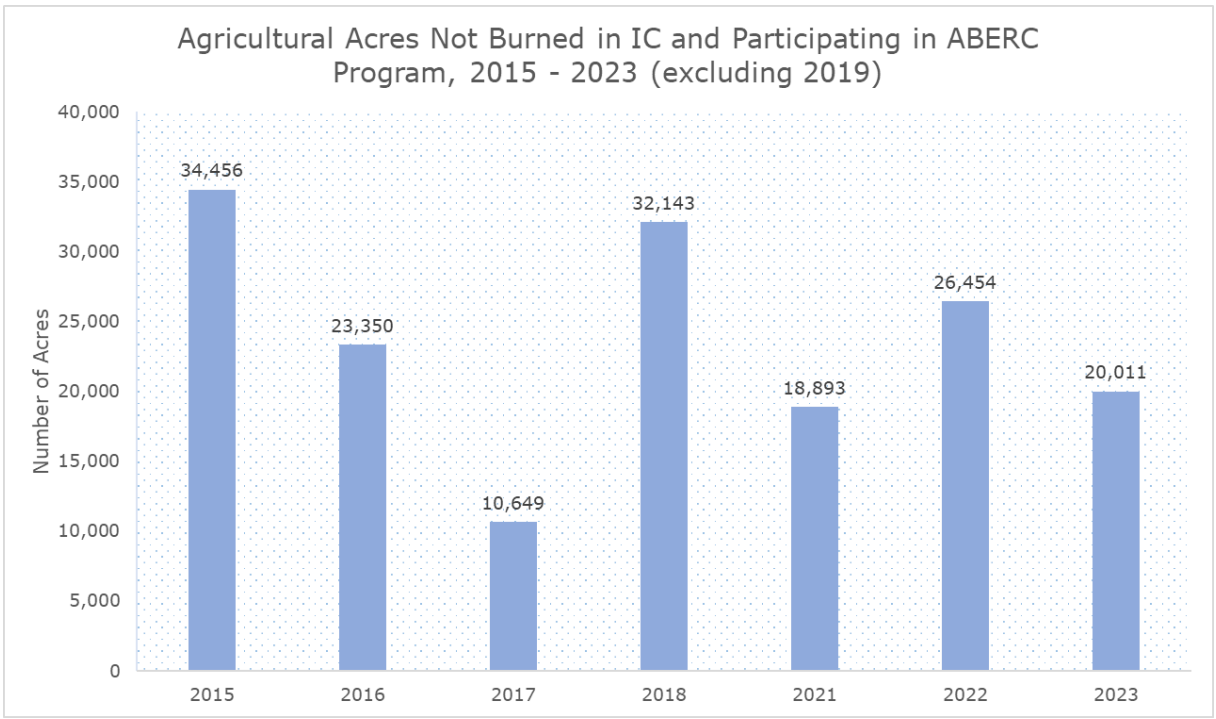


Figure 3.20. Agricultural Acres Not Burned in Imperial County and Participating in ABERC Program, 2015-2023 (excluding 2019)



Emission Reduction Credit (ERC) Program

An ERC can be earned by an entity when it reduces its emissions beyond what is required by certain regulations. That credit can then become an asset eligible for use by the entity who earned the credit, or it can be sold to other entities that need to offset their emissions. Rule 214, Emission Reduction Credit Banking, is the ICAPCD rule that standardizes ERCs by ensuring that all ERCs are transferred through the ERC bank.[110] This provides an administrative mechanism for the District to store ERCs for later use as offsets, or transfer to other sources for use as offsets. Eligibility standards, quantitative procedures, and administrative practices outlines in this rule ensure ERCs are real, permanent, quantifiable, enforceable, and surplus.

Rule 214 provides the general framework on how the District can award and transfer ERCs. Under this framework, the ICAPCD implements numerous ERC Programs across various sources including the following:

- *Rule 214.1, Mobile Source Emission Reduction Credit Banking*:[111] This rule establishes a procedure by which businesses and industries may create and use emission reduction credits from mobile sources. Eligible emission reduction strategies include an accelerated vehicle retirement program and retrofitting of passenger cars and light-, medium-, and heavy-duty vehicles. These credits may be used or transferred by stationary sources as offsets where allowed by rules and regulations.
- *Rule 214.2, Paving Unpaved Public Roads Emission Reduction Credits*:[112] This rule, which is focused on PM_{10} emissions, provides a procedure for quantifying and certifying emission reductions for voluntary paving of unpaved public roads as well as issuing PM_{10} Paving Emission Reduction Credit (PERC) certificates. Once issued, PERC certificates may be used to provide offsets for a new or modified facility or emissions unit.
- *Rule 214.3, Agricultural Burning Emission Reduction Credit Bank*:[113] This rule ensures that agricultural burning emission reduction credits (ABERCs) are transferred through the ABERC bank. Credits can be awarded when an applicant demonstrates that the decision to not burn land results in an emissions decrease. These credits may be used as permit offsets or transferred. As shown in Figures 3.19 and 3.20 above, since 2015, the number of acres participating in the ABERC program has been larger than the number of acres burned. ABERCs are reduced in value over time, such that by the end of the fifth year after the ABERCs are generated, any unused amount will be zero.

Between 2021 and 2023, no ERCs were generated through the ICAPCD's mobile source ERC program or paving program. ERCs were generated from the agricultural burning program and are shown in Table 3.10.

[110] ICAPCD. 2015. Rule 214: ERC Banking. Available at: https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID1251.pdf. Accessed: October 2024.
[111] ICAPCD. 2006. Rule 214.1: Mobile Source Emission Reduction Credit Banking. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2023/07/1RULE214.1.pdf. Accessed: October 2024.
[112] ICAPCD. 2017. Rule 214.2: Paving Unpaved Roads Emission Reduction Credits. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2020/01/1RULE214-2.pdf. Accessed: October 2024.
[113] ICAPCD. 2015. Rule 214.3 Agricultural Burning Emission Reduction Credit (ABERC) Bank. Available at: https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID1254.pdf. Accessed: October 2024.

Table 3.10. Imperial County Agricultural Burning Emission Reduction Credits Generated (Tons)			
	2021	**2022**	**2023**
PM_{10}	141	176	159
CO	1,090	1,470	1,170
TOC	95.6	120	107
NOx	42.0	55.6	45.9

Rule 310, Operational Development Fee

The purpose of ICAPCD's *Rule 310, Operational Development Fee*, is to provide ICAPCD with a mechanism for mitigating PM_{10} and NO_X emissions produced from the operation of new commercial and residential development projects.[114] Project participants may choose from three options to comply with the rule: payment of a pre-determined one-time project mitigation fee, development of an Alternative Emission Reduction Plan ("AER Plan") to reduce emissions from the project, or request a project-specific operational emissions analysis to reduce the mitigation fees. The funds generated by the Operational Development Fees are distributed by ICAPCD for various PM_{10} and NO_X emissions mitigation projects.

Table 3.11 presents annual NO_X and PM emission reductions from Rule 310 projects in ICAPCD from 2021 to 2023.

Table 3.11. Imperial County Emission Reductions from Rule 310 Projects, 2021-2023		
Pollutant	**Mitigation Project**	**Annual Emission Reduction (tpy)**
NO_X	Magnolia School Bus	5.70
NO_X	Public Works Water Truck #258	1.08
NO_X	Public Works Water Truck #364	0.0600
NO_X	Holtville Vehicle #26	0.100
NO_X	La Brucherie Produce	0.970
NO_X	Various Agency Tractors (8 Agricultural Tractors)	8.49
NO_X	Diesel Engine Retrofits (9 total engines)	9.49
NO_X	El Centro Elementary School District Bus Replacement	0.864
NO_X	Holtville Unified School District Bus Replacement	0.100

[114] ICAPCD. 2024. Rule 310: Operational Development Fee. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2023/10/1RULE310-JAN-2024.pdf. Accessed: October 2024.

Table 3.11. Imperial County Emission Reductions from Rule 310 Projects, 2021-2023		
Pollutant	**Mitigation Project**	**Annual Emission Reduction (tpy)**
PM	City of El Centro Swarthout Parking Lot	1.08
PM	City of Brawley Volunteer Park Parking Lot	3.15
PM	Sunflower School Baseball Parking Lot	1.57
PM	Sunflower School Soccer Parking Lot	2.36
PM	Calexico High School Parking Lot – Two Parking Lots	5.01
PM	Holtville Pine School Parking Lot Paving Project	0.720
PM	McKinley Elementary Parking Lot Paving	0.530
PM	San Pasqual Middle School Parking Lot	0.440

Policies

The ICAPCD has an internal policy manual with policies ranging from those that are administrative in nature to those centered on specific source types. Policies that are relevant to specific source types discussed in this CERP include:

- *Policy #8, Designation of Restricted and Prohibited Burning Areas*[115] This policy prohibits field burning and other large burns for areas within any city or townsite and specifies multiple prohibited burn areas.
- *Policy #15, Burning of Residential Green Waste*:[116] This policy ensures that residential green waste is regulated similar to that of permitted burning, in compliance with existing District regulations, so that it will not constitute a nuisance.
- *Policy #34, Agricultural Burning Procedures for Allocating Acreage, Burn Day Decisions, and Tracking*:[117] This policy ensures that burn acreage is limited, proper mechanisms for tracking acreage burned are in place, and that meteorological conditions are reviewed before allowing permitted burns.

[115] ICAPCD. 2022. Policy 8. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2022/11/P8-Restriction-of-Burn-Areas-Sept.-2022-FINAL.pdf. Accessed: October 2024.
[116] ICAPCD. 2023. Policy 15. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2023/05/P15-Burning-of-Residential-Green-Waste.pdf. Accessed: October 2024.
[117] ICAPCD. 2019. Policy 34. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2022/03/P34-Ag-Burning-Proc.-for-Alloc.-Acreage.pdf. Accessed: October 2024.

- *Good Neighbor Policy (Policy #37)*:[118] This policy establishes procedures for proper notification and traffic re-routing during agricultural burning to reduce impacts to Imperial County residents.
- *Policy #38, Recommended Mitigation Measures for Large Confined Animal Facilities*:[119] This policy requires beef feedlots and dairies that meet the criteria for a Large Confined Animal Facility to submit an application for an Authority to Construct (ATC)/Permit to Operate (PTO), which is to include an emission mitigation plan. This plan is to contain several measures as appropriate to each source category for the District to consider.
- *Policy #40, Establishment of NO_X Emission Limits on Existing Permitted Emergency Standby Internal Combustion Engines*:[120] This policy sets NO_X limits on existing permitted emergency standby internal combustion engines.

3.2.3 Existing State Policies and Programs

Overview of California Air Resources Board's Statewide Actions

Community-scale air pollution exposure is caused by many factors, including the cumulative impacts of multiple pollution sources. Effective solutions require multiple strategies at both the statewide and local levels to deliver new emissions reductions directly within these communities. The California Air Resources Board (CARB) has adopted several comprehensive air quality and climate plans over the last several years that lay out new emissions reduction strategies. These plans include the recent State Strategy for the State Implementation Plan,[121] California's 2022 Climate Change Scoping Plan,[122] the California Sustainable Freight Action Plan,[123] the Short-Lived Climate Pollutant Reduction Strategy,[124] and the 2020 Mobile Source Strategy,[125] along with a suite of incentive programs. CARB is continuing to develop air quality and climate plans that will further reduce emissions. The Community Air Protection Blueprint 2.0 contains additional strategy implementation guidance to reduce emissions of toxic air contaminants and criteria air pollutants in communities affected by a high cumulative exposure burden, and reflects the experience and lessons learned from the first years of the program

[118] ICAPCD. 2022. Policy 37. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2022/06/P37-Good-Neighbor-Policy-REV-06-07-22.pdf. Accessed: October 2024.
[119] ICAPCD. 2022. Policy 38. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2022/06/P38-Rec.-Mitig.-Meas.-LCAFs-REV-06-07-22.pdf. Accessed: October 2024.
[120] ICAPCD. 2022. Policy 40. Available at: https://apcd.imperialcounty.org/wp-content/uploads/2022/06/P40-Estab.-of-NOx-Emiss.-Limits-Rule-400-REV-06-07-22.pdf. Accessed: October 2024.
[121] CARB. 2022. 2022 State Strategy for the State Implementation Plan (2022 State SIP Strategy). Available at: https://ww2.arb.ca.gov/resources/documents/2022-state-strategy-state-implementation-plan-2022-state-sip-strategy. Accessed: October 2024.
[122] CARB. 2022. 2022 Scoping Plan Documents. Available at: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents. Accessed: October 2024.
[123] CARB. 2016. California Sustainable Freight Action Plan. Available at: https://ww2.arb.ca.gov/our-work/programs/california-sustainable-freight-action-plan. Accessed: October 2024.
[124] CARB. 2017. Final Short-Lived Climate Pollutant Reduction Strategy. Available at: https://ww2.arb.ca.gov/resources/documents/slcp-strategy-final. Accessed: October 2024.
[125] CARB. 2021. 2020 Mobile Source Strategy. Available at: https://ww2.arb.ca.gov/resources/documents/2020-mobile-source-strategy. Accessed: October 2024.

development and implementation.[126] Blueprint 2.0 further identifies additional actions to reduce the air pollution burden in heavily impacted communities throughout the State. Together, these plans provide a foundation for the new actions identified as part of this community emissions reduction program.

This section illustrates CARB's role in the community emissions reduction program by broadly describing the regulatory and incentive-based statewide actions CARB has taken to reduce emissions statewide. It also highlights specific actions that address areas of concern identified by the Brawley, Westmorland, and Calipatria Community Steering Committee.

Incentive Programs

CARB operates incentive programs that reduce the costs of developing, purchasing, or operating cleaner technologies. The programs help ensure cleaner cars, trucks, equipment, and facilities are operating in our neighborhoods by driving the development of new, cleaner technologies, and by accelerating their sale and adoption. Specifically, they accelerate the introduction of advanced technology vehicles and equipment, accelerate the turnover of older and higher emitting vehicles and equipment, and increase access to clean vehicles and transportation in disadvantaged communities and lower-income households.

While CARB is responsible for program oversight, some programs are implemented in partnership with local air districts. Examples of CARB incentive programs include:

- The Carl Moyer Memorial Air Quality Standards Attainment Program[127]
    - The Community Air Protection Incentives[128] are implemented by the air district through this program,
- Proposition 1B: Goods Movement Emission Reduction Program,[129]
- Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program,[130] and
- Low Carbon Transportation Investments and Air Quality Improvement Program (which includes the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project).[131]

[126] CARB. 2023. Community Air Protection Program Blueprint 2.0. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-04/BP2.0_FULL_FINAL_ENG_2024_04_09.pdf. Accessed: October 2024.
[127] CARB. Carl Moyer Memorial Air Quality Standards Attainment Program. Available at: https://ww2.arb.ca.gov/our-work/programs/carl-moyer-memorial-air-quality-standards-attainment-program. Accessed: October 2024.
[128] CARB. 2024. Community Air Protection Incentives. Available at: https://ww2.arb.ca.gov/our-work/programs/community-air-protection-incentives. Accessed: October 2024.
[129] CARB. Proposition 1B: Goods Movement Emission Reduction Program. Available at: https://ww2.arb.ca.gov/our-work/programs/proposition-1b-goods-movement-emission-reduction-program. Accessed: October 2024.
[130] CARB. 2024. FARMER Program. Available at: https://ww2.arb.ca.gov/our-work/programs/farmer-program. Accessed: October 2024.
[131] CARB. 2024. Low Carbon Transportation Incentives and Air Quality Improvement Program. Available at: https://ww2.arb.ca.gov/our-work/programs/low-carbon-transportation-incentives-and-air-quality-improvement-program. Accessed: October 2024.

Community Air Protection Incentives

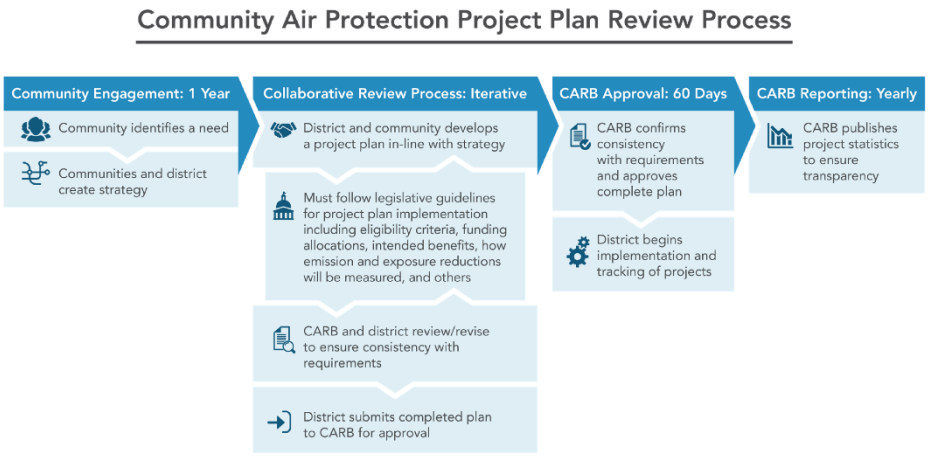
Since 2017, the California Legislature has appropriated money annually from the Greenhouse Gas Reduction Fund (GGRF) for incentives to support AB 617. In advance of initial community selection in 2018, the Legislature directed that CAP Incentives appropriated in Fiscal Year (FY) 2017-18 be focused on disadvantaged and low-income communities through the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program) and the Proposition 1B Goods Movement Emission Reduction Program (Proposition 1B Program) to provide immediate air quality benefits in heavily impacted communities.

Between FYs 2017-18 and 2022-23, the Legislature appropriated $1,204 million in CAP Incentives. The Legislature initially appropriated incentives to generate immediate air quality benefits in communities most likely to participate in AB 617 – primarily disadvantaged communities – as the program began to develop. Additionally, the Board set specific priority population investment targets for the funds: 70%in and benefiting disadvantaged communities and 80%in and benefiting disadvantaged or low-income communities. Through November of 2023, air districts have expended over $511 million dollars with $193 million in AB 617 communities. The majority of the remaining $318 million in CAP Incentives expended (94%) have been in other disadvantaged and low-income communities across the State.[132]

To expand on initial funding options in the CAP Incentives Guidelines, CARB developed a process for the air districts to fund new projects responsive to community priorities and to expand stationary source incentives. CARB staff worked with the air districts and California Air Pollution Control Officers Association (CAPCOA) through late 2019 and early 2020 to ensure the process maximized flexibility to support projects requested by community members while simultaneously meeting the need to assess emissions reductions and other benefits. Staff published this expanded version of the CAP Incentives Guidelines in October 2020.

The revised guidelines allow air districts to expeditiously develop and fund projects to reduce emissions from stationary sources and to address those concerns identified and prioritized in each CERP through Community-Identified Projects. As a criterion for CARB's approval of a CERP, air districts must describe the level of support it received from the Community Steering Committee. Subsequent proposed project plans to implement incentives-based- strategies and Community Identified Projects must also document strong, widespread, and clear community support and include descriptions of community benefits, both those benefits that are quantifiable and those more qualitative in nature. The graphic below illustrates the process by which a Project Plan is developed and approved. This iterative process allows districts and CARB to account for complicated, unique, or unusual projects and ensure that they will be responsive to community needs.

[132] Disadvantaged and low-income communities as defined by Assembly Bill 1550 (Gomez, Chapter 369, Statutes of 2016), read more here: https://calepa.ca.gov/envjustice/ghginvest/.



Several innovative incentive projects were initiated in 2022 and funded by CAP Incentives. San Joaquin Valley Air Pollution Control District (SJVAPCD) has numerous Community-Identified Projects totaling over $5 million, including wood stove replacements, EV charging infrastructure, low-dust nut harvesters, lawn and garden, and alternatives to agricultural burning. With support from Portside Environmental Justice Neighborhoods' CSC, SDAPCD proposed, and CARB approved, an electric truck pilot project for Portside to incentivize e-truck purchases as a Community-Identified Project. On behalf of their AB 617 communities, South Coast Air Quality Management District (SCAQMD) has submitted a Draft AB 617 Truck Incentives Workplan to CARB for review that will provide opportunities for fleet owners to assess the suitability of zero-emission or near-zero-emission medium- or heavy-duty trucks and supporting infrastructure by allowing them to test drive the cleaner trucks for some time.

In 2023, staff recognized that other communities, particularly those that have been consistently nominated but not yet selected for participation in AB 617, could likewise benefit from their air districts implementing these kinds of innovative new projects, and began to work with the air districts through a public process to revise the CAP Incentives Guidelines to expand eligibility to such projects statewide. Staff published revised CAP Incentives Guidelines in April 2024, incorporating many of the approved community-identified projects as new chapters eligible for any air district to implement in their most heavily impacted communities. New chapters include incentives for agency partnerships, vegetative barriers and community greening, emergency diesel generator replacement, paving and bike path projects, dial-a-ride vehicle replacements, alternatives to agricultural burning, and low-dust nut harvester replacements.

Regulatory Programs

Federal, State, and local air quality agencies all work together to reduce emissions. At the federal level, the U.S. Environmental Protection Agency (U.S. EPA) has primary authority to control emissions from certain mobile sources, including sources that are all or partly under federal jurisdiction (e.g., some farm and construction equipment, aircraft, marine vessels, locomotives), which it shares in some cases with air districts and CARB. The U.S. EPA also establishes ambient air quality standards for some air pollutants. At the State level, CARB is responsible for controlling emissions from mobile sources and consumer products (except where federal law pre-empts regulation by CARB), controlling toxic emissions from mobile and stationary sources, controlling

greenhouse gases from mobile and stationary sources, developing fuel specifications, and coordinating State-level air quality planning strategies with other agencies.

Regionally, air districts are primarily responsible for controlling emissions from stationary and indirect sources through rules and permitting programs within their regions (except for consumer products in most cases).

CARB regulatory programs are designed to reduce emissions to protect public health, achieve air quality standards, reduce greenhouse gas emissions, and reduce exposure to toxic air contaminants. CARB establishes regulatory requirements for cleaner technologies (both zero and near-zero emissions) and their deployment into the fleet for cleaner fuels and to ensure in-use performance. CARB's regulatory programs are broad – impacting stationary sources, mobile sources, and multiple points within product supply chains from manufacturers to distributors, retailers, and end-users. CARB's regulations affect cars, trucks, ships, off-road equipment, consumer products, fuels, and stationary sources.

One important and relevant regulatory authority of CARB is to adopt measures to reduce emissions of toxic air contaminants from mobile and non-mobile sources, known as Airborne Toxic Control Measures (ATCM).[133] These regulatory measures include process requirements, emissions limits, or technology requirements. Additionally, CARB implements the Statewide Air Toxics "Hot Spots" Program[134] to address the health risk from toxic air contaminants at individual facilities across the State. The Air Toxics "Hot Spots" Program includes several components to collect emissions data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels.

Under the Air Toxics "Hot Spots" Program, air districts are required to set a threshold for facilities that pose a significant health risk and prioritize facilities for health risk assessments. Air districts also establish a risk value above which facilities must conduct a risk reduction audit and emissions reduction plan. Facilities must develop these health risk assessments, risk reduction audits, and emission reduction plans. CARB provides technical guidance to support smaller businesses in conducting health risk assessments and developing emissions reduction plans.

Additionally, CARB has pursued enforceable agreements with industry that result in voluntary but enforceable adoption of the cleanest technologies or practices and provide assurance that emissions reductions will be realized. CARB's agreement with the Union Pacific Railroad Company and BNSF Railway Company to accelerate the introduction of cleaner locomotives in the South Coast Air Basin is an example of an enforceable agreement.

CARB Actions Related to the Brawley, Westmorland, and Calipatria Community

This section highlights CARB actions that specifically relate to the Brawley, Westmorland, and Calipatria Community actions identified by the CSC. This list should not be interpreted as exhaustive but rather illustrative of some of the major statewide strategies driving emissions

[133] California Health and Safety Code. Section 39650 et seq. Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=39650.&lawCode=HSC. Accessed: October 2024.

[134] CARB. Overview of the Air Toxics “Hot Spots” Information and Assessment Act. Available at: https://www.arb.ca.gov/ab2588/overview.htm. Accessed: October 2024.

reductions in conjunction with those local-level strategies identified in this community emissions reduction program. More information on CARB's regulatory process can be found in the Online Resource Center.[135] The list of CARB actions and their anticipated benefits in current AB 617 communities is also available on the Program CommunityHub.[136]

Recently Adopted CARB Regulations

In June 2022, CARB approved Advanced Clean Cars II.[137] The Advanced Clean Cars II regulations will reduce emissions from light-duty vehicles between 2026 and 2035 by increasing the number of zero-emission vehicles and strengthening standards for gasoline-powered cars. These measures support California's goal of having all new passenger vehicles be zero-emission by 2035, as outlined in Governor Newsom's 2020 Executive Order.

In October 2022, CARB approved Advanced Clean Fleets (ACF).[138] The ACF Regulation aims to reduce emissions from California's truck and bus fleets by introducing zero-emission vehicle (ZEV) technologies, requiring targeted fleets to phase in ZEVs and manufacturers to produce only ZEV trucks starting in 2036. This regulation is expected to introduce 1.69 million ZEVs by 2050, improve air quality, and provide $26.5 billion in health benefits while saving fleet owners an estimated $48 billion.

In December 2019, CARB approved Advanced Clean Trucks.[139] The Advanced Clean Trucks Regulation aims to accelerate the adoption of zero-emission vehicles (ZEVs) in the medium- and heavy-duty truck sector to reduce harmful emissions from on-road sources. Its objectives include achieving 100% zero-emission pickup and delivery by 2040, supporting the transition to zero-emission drayage trucks by 2035, and fostering a large-scale, self-sustaining ZEV market, with a focus on environmental benefits for disadvantaged communities.

In March 2021, CARB approved Clean Miles Standard.[140] In May 2021, CARB adopted the Clean Miles Standard to reduce emissions from transportation network companies (TNCs) like Uber and Lyft, addressing concerns over increased vehicle miles traveled, congestion, and emissions. The regulation aligns with California's Advanced Clean Cars II regulations and the SB 375 program, which promotes regional greenhouse gas reductions through land use and transportation planning.

In February 2021, CARB approved Consumer Products Standards.[141] The 2022 Consumer Products Standard Amendments lower VOC standards for various personal care products, extend

[135] CARB. Community Air Protection Program Resource Center. Available at: https://ww2.arb.ca.gov/ocap_resource_center. Accessed: October 2024.
[136] CARB. Community Air Protection Program Communities. Available at: https://ww2.arb.ca.gov/capp-communities. Accessed: October 2024.
[137] CARB. Advanced Clean Cars II. Available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii. Accessed: October 2024.
[138] CARB. Advanced Clean Fleets. Available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets. Accessed: October 2024.
[139] CARB. Advanced Clean Trucks. Available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks. Accessed: October 2024.
[140] CARB. Clean Miles Standard. Available at: https://ww2.arb.ca.gov/our-work/programs/clean-miles-standard. Accessed: October 2024.
[141] CARB. Consumer Products Program. Available at: https://ww2.arb.ca.gov/our-work/programs/consumer-products-program. Accessed: October 2024.

the ban on certain toxic air contaminants and high global warming potential compounds, and eliminate the Two Percent Fragrance Exemption for most consumer products. They also promote the use of innovative propellants in select products and enhance regulatory measures to reduce emissions and improve program transparency.

In August 2020, CARB approved Heavy-Duty "Omnibus" Low NOx Rulemaking.[142] In August 2020, CARB approved stricter NOx and particulate matter emission standards for heavy-duty vehicles, along with extending warranty and useful life requirements to ensure long-term emission control effectiveness. The amendments also introduced new compliance programs, incentives for zero-emission vehicles, and clarified regulations to better align with federal standards and support California's emissions reduction goals.

In December 2021, CARB approved Heavy-Duty Inspection and Maintenance.[143] Dubbed the Clean Truck Check, the program combines periodic vehicle testing requirements with other emissions monitoring techniques and expanded enforcement strategies to identify vehicles in need of emissions related repairs and ensure any needed repairs are performed. When fully implemented, the program will provide significant reductions in smog-forming and carcinogenic toxic air pollution necessary to achieve federal air quality mandates and healthy air in California's communities.

In August 2020, CARB approved Heavy-Duty On-Road and Off-Road Engine In-Use Testing.[144] This strategy will involve real world screening of heavy-duty trucks and off-road engines operating in selected communities to target heavy-duty in-use compliance testing.

In September 2017, CARB approved Incentive Funding to Support Immediate Emissions Reductions.[145] The Community Air Protection (CAP) Incentives Program focuses on implementing advanced technologies to reduce air pollution in California's most impacted communities.

In April 2024, CARB updated the program guidelines to expand opportunities for disadvantaged areas by increasing eligibility and introducing new project categories based on five years of community-driven emission reduction efforts.

In November 2022, CARB approved In-Use Locomotive Regulation.[146] The In-Use Locomotive Regulation (Regulation) will achieve emission reductions from diesel-powered locomotives and increase the use of zero-emission (ZE) technology. The Regulation will help meet California's public health, air quality and climate goals by reducing criteria pollutants, toxic air contaminants, and greenhouse gas emissions for locomotives in-use.

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[142] CARB. Heavy-Duty Low NOx. Available at: https://ww2.arb.ca.gov/our-work/programs/heavy-duty-low-nox. Accessed: October 2024.
[143] CARB. Clean Truck Check (HD I/M). Available at: https://ww2.arb.ca.gov/our-work/programs/CTC. Accessed: October 2024.
[144] CARB. Heavy-Duty In-Use Compliance Program. Available at: https://ww2.arb.ca.gov/heavy-duty-in-use-compliance-program. Accessed: October 2024.
[145] CARB. Incentive Funding. Available at: https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/incentive-funding. Accessed: October 2024.
[146] CARB. Reducing Rail Emissions in California. Available at: https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california. Accessed: October 2024.

In November 2022, CARB approved In-Use Off-Road Diesel Fueled Fleets Amendment.[147] The amendments to California's In-Use Off-Road Diesel-Fueled Fleets Regulation, effective January 2024, accelerate the phase-out of older diesel vehicles and enforce stricter emission controls. These changes aim to reduce harmful pollutants, improve air quality, and support environmental justice, with funding available for cleaner technology.

In November 2022, CARB approved National Locomotives Standards Petition.[148] In 2022, the U.S. EPA agreed to review and potentially strengthen locomotive emission standards in response to CARB's 2017 petition. The EPA aims to phase out older, high-emission locomotives and support zero-emission technology, with a focus on reducing pollution in disadvantaged communities.

In November 2022, CARB approved Off-Road Diesel Engine Emission Standards.[149] The Regulation for In-Use Off-Road Diesel-Fueled Fleets reduces emissions by requiring fleet owners to phase out older diesel engines and adopt cleaner technologies. It enforces reporting and compliance deadlines based on fleet size, aiming to cut harmful pollutants and improve air quality, especially in impacted communities.

In July 2021, CARB approved On-Board Diagnostic System Requirements (OBD II & HD OBD).[150] CARB proposed updates to California's On-Board Diagnostic (OBD) regulations for various vehicle types to improve emission and performance monitoring. These revisions introduce stricter standards, modified phase-in schedules, and new reporting requirements, while addressing stakeholder feedback and balancing impacts on manufacturers and air quality objectives.

In September 2021, CARB approved Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.[151] CARB's amendments to the TRU ATCM require transitioning diesel-powered truck TRUs to zero-emission technology, introducing stricter PM standards, and using lower-GWP refrigerants. Facility and TRU owners must comply with new reporting, labeling, and fleet turnover requirements, ensuring all truck TRUs in California are zero-emission by 2029.

In January 2023, CARB approved Proposed Amendments to the Hexavalent Chromium Airborne Toxic Control Measure (ATCM) for Chrome Plating and Chromic Acid Anodizing Operations.[152] CARB's amendments to the Airborne Toxic Control Measure for chromium electroplating aim to phase out hexavalent chromium, a known carcinogen, by 2039. The amendments introduce

[147] CARB. In-Use Off-Road Diesel-Fueled Fleets Regulation. Available at: https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation. Accessed: October 2024.
[148] CARB. U.S. EPA Responds to CARB's Petition to Strengthen Locomotive Emission Standards. Available at: https://ww2.arb.ca.gov/resources/documents/us-epa-responds-carbs-petition-strengthen-locomotive-emission-standards. Accessed: October 2024.
[149] CARB. In-Use Off-Road Diesel-Fueled Fleets Regulation. Available at: https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation. Accessed: October 2024.
[150] CARB. OBD – On-Board Diagnostic Program. Available at: https://ww2.arb.ca.gov/our-work/programs/obd. Accessed: October 2024.
[151] CARB. 2022. 2022 Amendments to the TRU ATCM. Available at: https://ww2.arb.ca.gov/resources/fact-sheets/2022-amendments-tru-atcm. Accessed: October 2024.
[152] CARB. Chrome Plating ATCM. Available at: https://ww2.arb.ca.gov/our-work/programs/chrome-plating-atcm. Accessed: October 2024.

alternative technologies, stricter emission controls, and prioritize health benefits for disadvantaged communities while addressing economic impacts.

In December 2017, CARB approved Short-Lived Climate Pollutant Reduction Strategy - Dairy and Other Livestock.[153] The CARB's SLCP Reduction Strategy targets methane emissions from dairy and livestock by promoting improved manure management and reducing enteric fermentation through better feed practices. The goal is to cut methane emissions by 40% from 2013 levels by 2030, supported by incentives and pilot projects.

In December 2017, CARB approved Short-Lived Climate Pollutant Reduction Strategy - Organic Waste in Landfills.[154] The SLCP Reduction Strategy seeks to reduce methane emissions by cutting the disposal of organic waste in landfills by 75% by 2025, promoting the diversion of organic materials into compost, renewable natural gas, and energy. It supports regulations and incentives to enhance recycling infrastructure and reduce methane emissions from landfills.

In December 2021, CARB approved Small Off-Road Engine Amendment.[155] CARB amended regulations for small off-road engines (SORE) to transition toward zero-emission equipment by 2035, setting stricter standards by 2024 and achieving zero emissions for generators by 2028. This initiative aims to reduce pollution from SORE and improve public health, while aligning with California's climate and air quality goals.

In September 2024, CARB approved Zero Emission Off-Road Forklift Regulation.[156] CARB's Zero-Emission Forklift (ZEF) regulation phases out gasoline and propane forklifts by 2026, replacing them with battery-electric and fuel-cell options to reduce pollutants like NOx and $PM_{2.5}$. This initiative supports California's climate goals, offering health benefits and economic savings while reducing emissions through 2043.

Estimated Emission Reductions from CARB Measures

The statewide strategy emission benefits provided in the CERP accounts for the combined effects of regulations adopted after AB 617 implementation began and regulations currently under rulemaking development. Potential emission reductions from adopted and proposed regulations for a given year are applied on top of each other. For example, if two regulations are applicable to the same source of emissions (e.g., trucks) then a new baseline is established by applying the reductions from the first proposed regulation to the original baseline, and then reductions from the second regulation are calculated based on the newer established baseline.

It is important to note that some of these regulations are in early phases of development and their adoption and implementation timelines are not well established. Additionally, the emission inventory used to estimate the potential emission reduction factors for these strategies are derived from draft inventories that will continue to be revised through the regulation development process. Once a statewide strategy or regulatory measure is adopted, emission reduction factors and

[153] CARB. Short-Lived Climate Pollutants. Available at: https://ww2.arb.ca.gov/our-work/programs/slcp. Accessed: October 2024.
[154] Ibid.
[155] CARB. Small Off-Road Engines (SORE). Available at: https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore. Accessed: October 2024.
[156] CARB. Zero-Emission Forklifts. Available at: https://ww2.arb.ca.gov/our-work/programs/zero-emission-forklifts. Accessed: October 2024.

related benefits will be updated to reflect the final inventory used in the regulation. As such, the draft statewide emissions reduction estimates presented in the CERP should only be used as a rough estimate that are subject to change in future.

CARB has estimated the emission reductions benefits for some of the adopted and proposed statewide measures as shown in Table 3.12 for the 2030 and 2035 milestone years and CERP lifetime for the Brawley, Westmorland, and Calipatria Community.

Table 3.12. Estimated Emission Reductions from CARB Measures in the Brawley, Westmorland, and Calipatria Community

Statewide Measures	Estimated Potential Emission Reductions $PM_{2.5}$, NOx and DPM, VOC (tons per year)							
	$PM_{2.5}$		DPM		NOx		VOC	
	2030	2035	2030	2035	2030	2035	2030	2035
Advanced Clean Cars 2	0.11	0.38	0.00	0.00	1.32	4.34	1.08	3.57
Advanced Clean Trucks	0.06	0.17	0.03	0.10	3.45	6.12	0.00	0.00
Heavy-Duty Inspection and Maintenance	0.26	0.25	0.28	0.27	22.13	22.17	0.00	0.00
Advanced Clean Fleets	0.06	0.17	0.03	0.10	3.45	6.12	0.00	0.00
Small Off-Road Engine Amendment	0.02	0.01	0.00	0.00	0.78	0.52	4.58	3.25
Transport Refrigeration Units (TRU) ATCM Amendments	0.28	0.35	0.30	0.37	0.95	1.03	0.13	0.14
On-Road Motorcycle Emissions Standard Amendment	0.00	0.00	0.00	0.00	0.11	0.20	0.25	0.75
In-Use Locomotive Regulation	0.18	0.18	0.19	0.19	7.21	8.51	0.31	0.35
Zero-Emissions Forklifts	0.00	0.01	0.00	0.00	0.07	0.11	0.01	0.02
Total	**0.97**	**1.51**	**0.83**	**1.02**	**39.47**	**49.12**	**6.37**	**8.08**

Note: Totals may not add up due to rounding.

3.2.4 Sensitive Receptors and Land Use Policy

Land use planning is essential for ensuring effective and efficient use of land resources. Land use policy regulates the types of land uses that can be established in certain areas and as a result, can aid in environmental conservation, reduce urban sprawl, and decrease the public's exposure to pollutants. The following sections identify the locations of sensitive receptors in the North End Phase 1 Community and provide an overview of the existing land use policies in Imperial County.

3.2.5 Identification of Sensitive Receptors

Sensitive receptors refer to those segments of the population most susceptible to impacts from air pollution emissions (e.g., children, the elderly, and people with pre-existing serious health problems affected by air quality).[157] Sensitive receptors include residential communities, public and private K-12 schools, public and private day care centers, convalescent homes and elderly residential facilities, hospitals and long-term care facilities, and parks and outdoor athletic facilities.

A search for non-residential sensitive receptors (such as daycare centers, schools, hospitals, and other care facilities) showed that there are at least 55 sensitive receptors within the North End Phase 1 Community (see Figures 3.21 through 3.23 and Appendix E). Non-residential sensitive receptor locations were identified based on searches of the following on-line public databases:

- California Community Care Licensing Division[158]
  - Residential Care Facilities for the Elderly
  - Child Care Centers
  - Adult Residential Facilities
- Homeland Infrastructure Foundation-Level Data[159]
  - Private Schools
  - Public Schools
  - Hospitals
  - Child Care Facilities

Discussions on the location of sensitive receptors took place during the Steering Committee meetings held on January 29, February 26, April 8, and April 15 2024 (Appendix A).

[157] CARB. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf. Accessed: October 2024.

[158] California Community Care Licensing Division. Available at: https://www.cdss.ca.gov/inforesources/community-care-licensing. Accessed: October 2024.

[159] Homeland Infrastructure Foundation-Level Data. Available at: https://hifld-geoplatform.hub.arcgis.com/. Accessed: October 2024.

Figure 3.21. Sensitive Receptor Locations in the City of Brawley

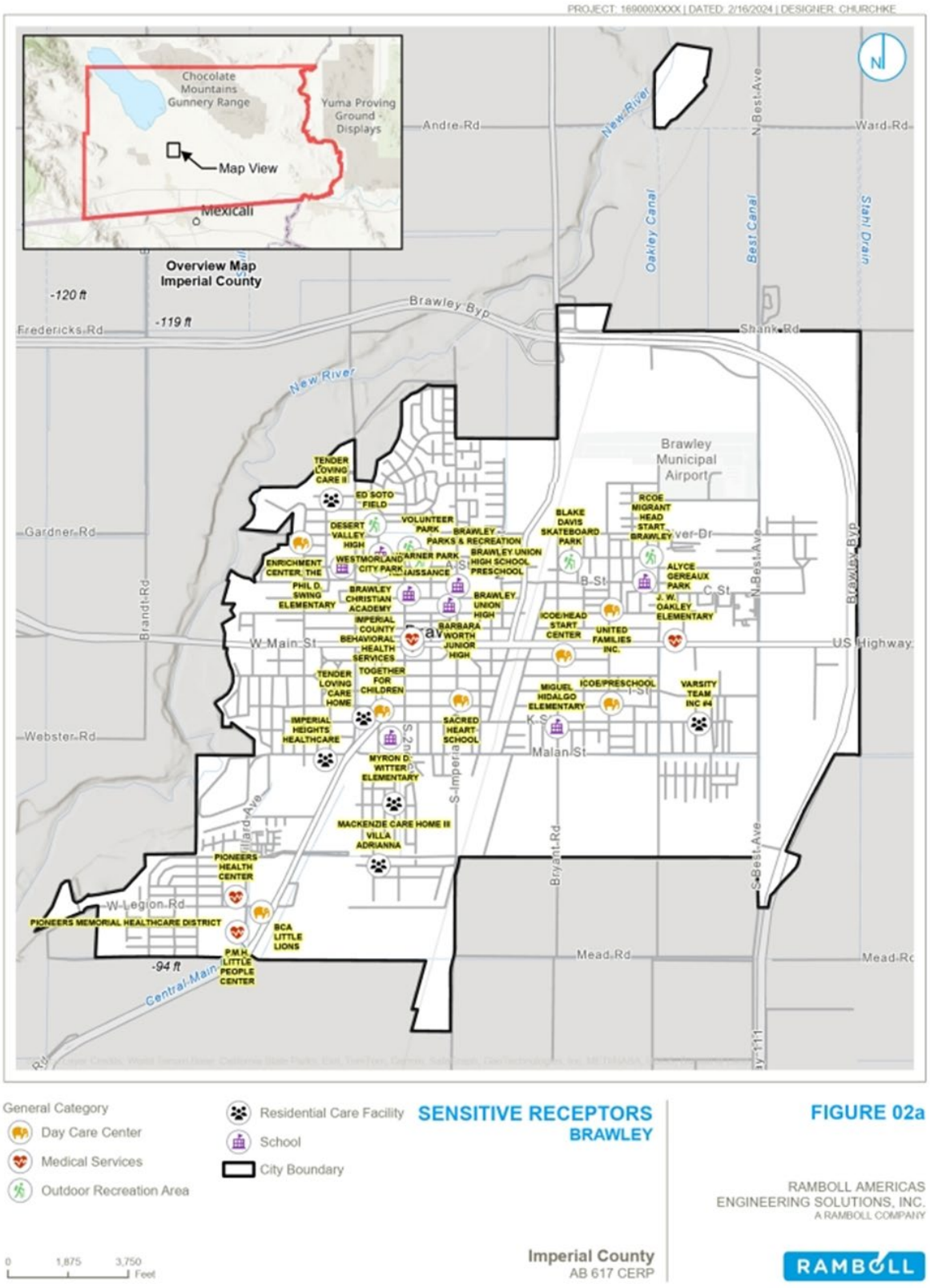


Figure 3.22. Sensitive Receptor Locations in the City of Westmorland

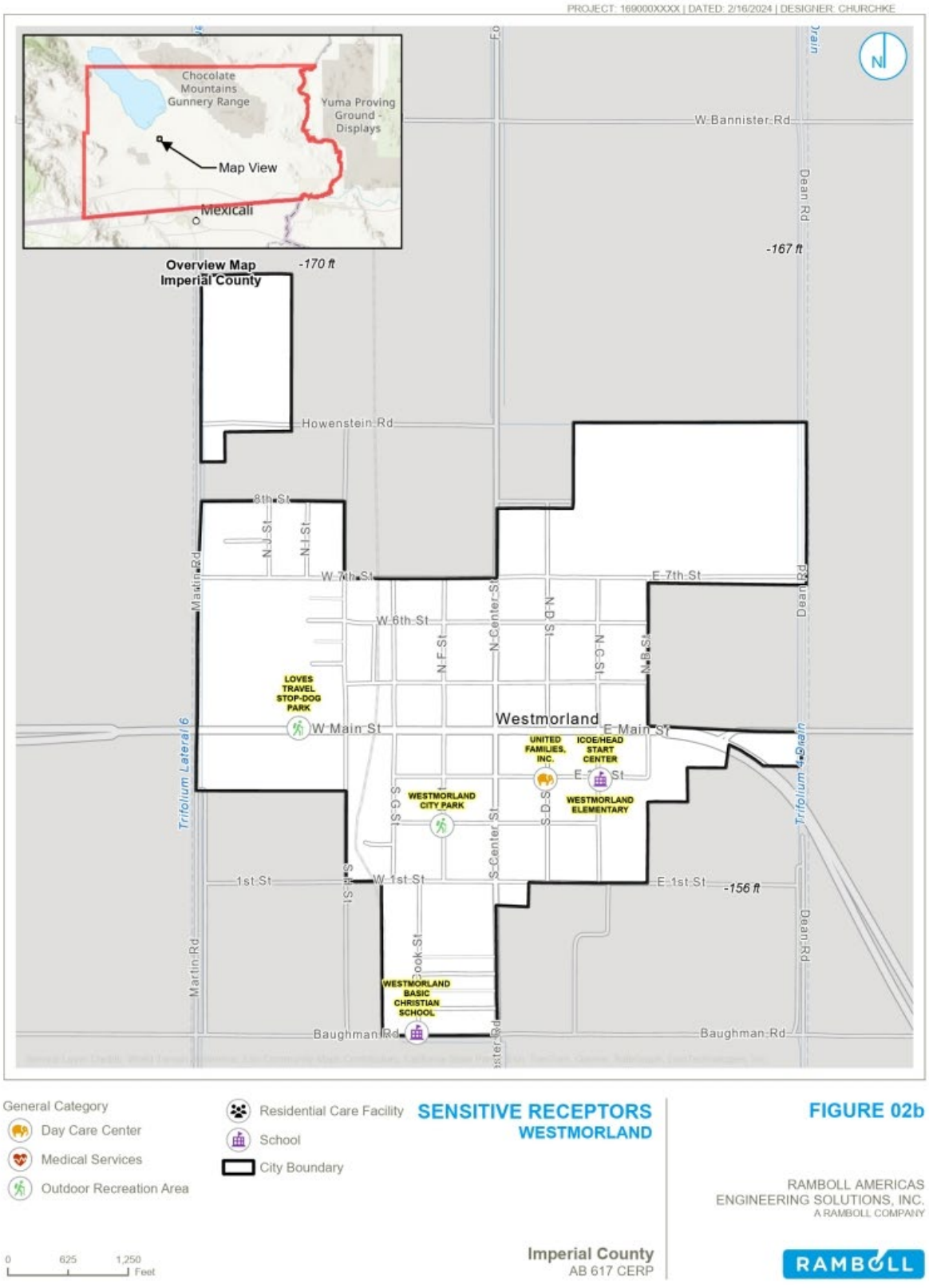
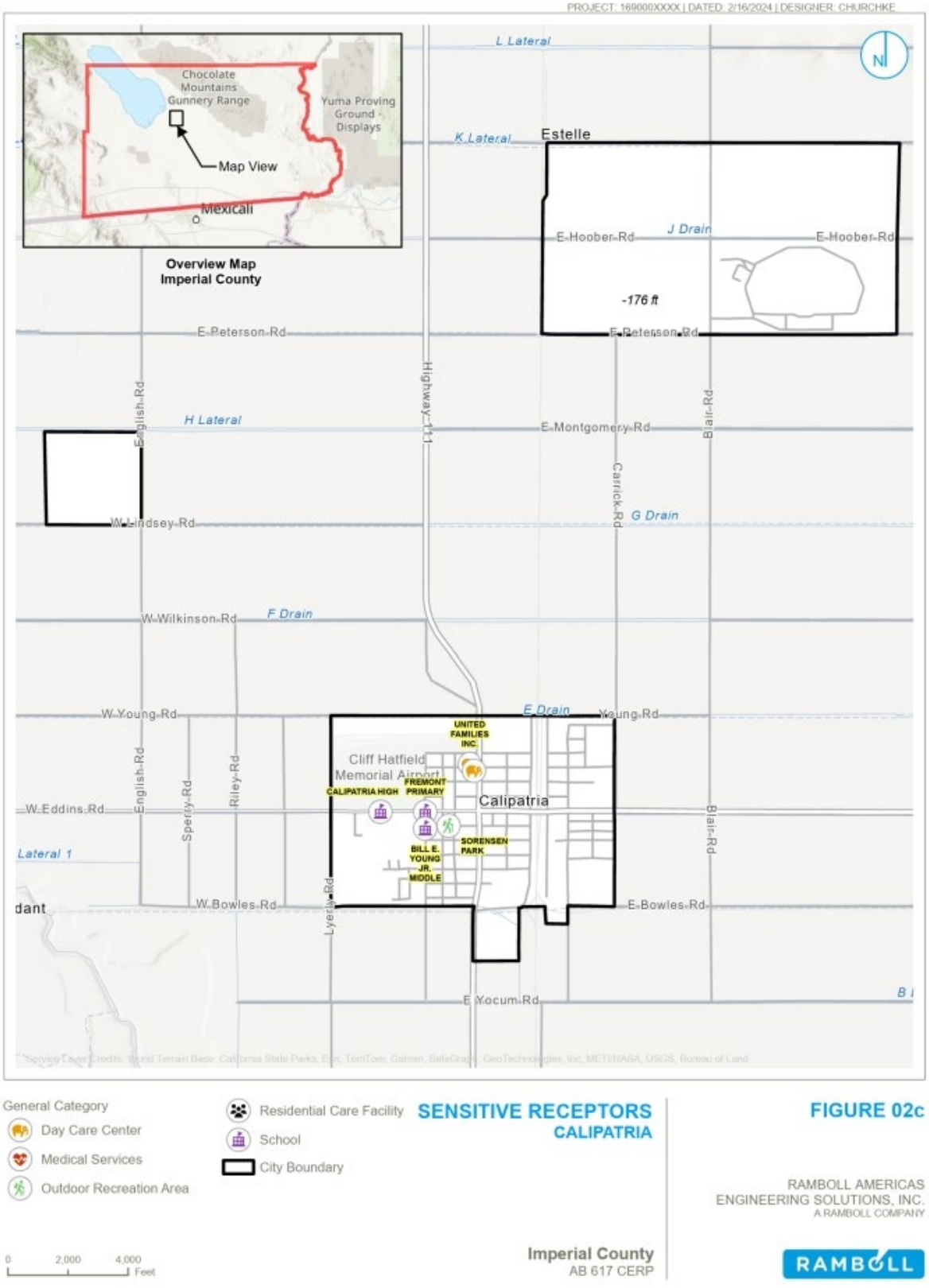


Figure 3.23. Sensitive Receptor Locations in the City of Calipatria



3.2.6 Overview of Existing Land Use Policy

Land use policy in the North End Phase 1 Community is managed by several entities including Imperial County, the City of Brawley, the City of Calipatria, and the City of Westmorland. Imperial County is responsible for the unincorporated areas of the County while the Cities of Brawley, Calipatria and Westmorland are responsible for the incorporated areas of their respective cities.

Imperial County Land Use Policy

Decisions regarding land use permit applications, zoning changes, general plan amendments, ordinance revisions, and the adoption of a revised general plan for unincorporated Imperial County are made by the Imperial County Board of Supervisors ("Board of Supervisors").[160] The Board of Supervisors is comprised of elected officials from each of the five supervisorial districts in the County. The Board of Supervisors oversees and/or consults with the following groups within the Planning and Development Services Department when making its decisions:

- **Planning Commission:** This commission reviews, revises, and implements the Imperial County General Plan ("General Plan") whenever necessary[161] and conducts studies and prepares plans as delegated by the Board of Supervisors. As of July 2024, the General Plan consists of 12 individual elements including elements for agriculture, noise, environmental justice, and a series of other topics.[162]
- **Airport Land Use Commission:** This commission reviews and makes determinations for the use of land within an airport's "sphere of influence", assures safety of air navigation, promotes air commerce, and conducts public hearings regarding any proposed development within their responsibility.[163]
- **Local Agency Formation Commission (LAFCO):** This commission is an independent agency responsible for the implementation of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, which was intended to discourage urban sprawl.[164] The Imperial County LAFCO consists of five members and is responsible for the oversight of boundary changes between the County, as well as the cities and special districts within the County.[165] Special Districts within the boundaries of the North End Phase 1 Community include the Hospital District of Pioneers Memorial Healthcare (Brawley, CA), and the Riverview Cemetery District (Brawley, CA).[166]

[160] Imperial County. 2024. Board of Supervisors. Available at: http://www.icpds.com/?pid=4382. Accessed: October 2024.
[161] Imperial County. 2024. Planning Commission. Available at: https://www.icpds.com/hearings/planning-commission. Accessed: October 2024.
[162] Imperial County. 2024. General Plan. Available at: https://www.icpds.com/planning/land-use-documents/general-plan. Accessed: October 2024.
[163] Imperial County. 2024. Airport Land Use Commission. Available at: https://www.icpds.com/hearings/airport-land-use-commission. Accessed: October 2024.
[164] Imperial LAFCO. 2024. Frequently Asked Questions. Available at: https://www.iclafco.com/about-us/frequently-asked-questions. Accessed: October 2024.
[165] Imperial LAFCO. 2024. Imperial Local Agency Formation Commission. Available at: https://www.iclafco.com/. Accessed: October 2024.
[166] Imperial LAFCO. 2024. Special Districts. Available at: https://www.iclafco.com/cities-districts/special-districts. Accessed: October 2024.

- **Environmental Evaluation Committee:** This committee evaluates all projects subject to the California Environmental Quality Act and makes recommendations about proposed projects.[167]
- **Building Board of Appeals:** This board conducts hearings for appeals concerning the decision of the Building Official, Condemnation of Structures, and the Board of Supervisors in matters that deal with the Building Department and the Building Ordinance[168].

Ultimately, the Board of Supervisors is responsible for implementing and amending the Land Use Ordinance for the County.[169] The Land Use Ordinance provides comprehensive land use regulations for all unincorporated areas in Imperial County. The Land Use Ordinance also establishes the Planning & Development Department, which is tasked with managing land use development in the County. For instance, the Planning & Development Department (and associated Planning Commission) is responsible for developing the General Plan for the County, which serves as a policy guide for future development. The Land Use Element,[170] specifically, designates the general distribution, location, and extent standards for housing, business, industry, agriculture, open space, public facilities, and other land uses and is based on the following six concepts adopted by the Board of Supervisors to support the General Plan:

1. Quality of life;
2. Safety for people and property;
3. Wide selection of social and economic opportunities;
4. Efficient use of natural, human, and financial resources;
5. Clean air, water, and land; and
6. Quiet, beautiful communities and rural areas.

The Land Use Element includes policies and programs that ensure appropriate land use development. These programs protect agricultural and industrial land uses from the encroachment of residential development, as well as protect residential land uses from environmental impacts of the former land uses. The Land Use Element strongly supports continued use of areas designated as agriculture and exclusion of incompatible residential uses in these areas. In addition, agricultural zones are preferred adjacent to industry. New residences, except for managers or caretakers, are prohibited in areas with industrial zoning. If residential areas are adjacent to industrial areas, the adjacent industrial area must be light industrial as a transition zone.

[167] Imperial County. 2024. Environmental Evaluation Committee. Available at https://www.icpds.com/hearings/environmental-evaluation-committee. Accessed: October 2024.
[168] Imperial County. 2008. Title 9 Land Use Ordinance Revisions to Divisions 4,5,8,10,12,14 and 16. Available at: https://www.icpds.com/assets/hearings/board-of-supervisors/202012151100-regular-meeting/03-Attach.-B-IS20-0020-TItle-9-Update-Ordinance-Revisions.pdf. Accessed: October 2024.
[169] Imperial County. 2024. Ordinances. Available at: https://www.icpds.com/planning/land-use-documents/ordinances. Accessed: October 2024.
[170] Imperial County. 2015. Land Use Element of the Imperial County General Plan. Available at: https://www.icpds.com/assets/planning/land-use-element/land-use-element-2015.pdf. Accessed: October 2024.

The Agricultural Element[171] includes policies and programs designed to protect the agricultural industry in Imperial County and ensure its continued prosperity. Adoption of the Agricultural Element has contributed to the continued success of this industry and outlines the ways in which the County is committed to the promotion, management, use, development, and protection of agricultural production. It serves to not only inform current and prospective developers of agricultural and non-agricultural lands, but also guide County staff goals, activities, and decisions regarding agricultural areas.

One particular goal of the Agricultural Element is to "Limit the introduction of conflicting uses into farming areas, including residential development of existing parcels which may create the potential for conflict with continued agricultural use of adjacent property". The Element recognizes that certain provisions of the Imperial County Right-to-Farm Ordinance[172] can be enforced in support of this goal. In an effort to reduce the loss of agricultural resources within the County, the Right to Farm ordinance clarifies the circumstances under which agricultural operations may be considered a "nuisance". Essentially, it stipulates that no lawful agricultural activity conducted for commercial purposes shall be considered a nuisance if it was not a nuisance when the activity began. This ordinance serves to protect existing agricultural operations from the legal implications of being declared a nuisance by public or private entities electing to locate themselves nearby.

Guidelines for updating and/or amending the General Plan are included in the Land Use Ordinance. To propose an update or amendment, applications must be submitted to the Planning & Development Department. The application is then reviewed by the Planning Commission, which recommends the approval of the proposed change or denies the application. The Board of Supervisors is tasked with providing final approval of General Plan amendments.

Urban Areas

The Urban Area designation on the Land Use Plan includes seven incorporated cities including three cities in the North End Phase 1 Community: Brawley, Westmorland, and Calipatria. The Urban designation also includes five unincorporated communities, none of which are located in the North End Phase 1 Community. These areas are characterized by a full level of urban services, in particular public water and sewer systems, and contain or propose a broad range of residential, commercial, and industrial uses. Urban Areas often have specific land use policies at the municipal level in an effort to meet the needs of the local community. The following sections discuss specific Land Use Policies for the North End Phase 1 communities of Brawley, Westmorland, and Calipatria.

City of Brawley Land Use Policy

The Brawley Urban Area (approx. 9,890 acres) surrounds the City of Brawley and includes nearby agricultural lands.[173] A balance between new urban development and conservation of agricultural

[171] Imperial County. 2015. Agricultural Element of the Imperial County General Plan. Available at: https://www.icpds.com/assets/planning/agricultural-element-2015.pdf. Accessed: October 2024.
[172] Imperial County. 1990. Right to Farm Ordinance No. 1031. Available at: https://www.icpds.com/assets/planning/general-plan-eir/m-appendix-b-right-to-farm-ordinance.pdf. Accessed: October 2024.
[173] Imperial County. 2015. Land Use Element of the Imperial County General Plan. Available at: https://www.icpds.com/assets/planning/land-use-element/land-use-element-2015.pdf. Accessed: October 2024.

lands is important for expansion of the local economy, conservation of prime agricultural soils for continued agricultural production, and maintenance of the City's rural character.

The City of Brawley Zoning Ordinance[174] provides a guide to land use planning and zoning within the City of Brawley. A key goal of the ordinance is to designate sufficient land within the City of Brawley for residential, commercial, industrial, agricultural, open space and recreational uses. Minimization of the loss of Agricultural Lands is an aspect of this plan. To protect agricultural land in Brawley, the General Plan Land Use Element designates northern, western and southern portions of the Planning Area for agricultural uses.[175]

Calipatria Land Use Policy

The Calipatria Urban Area (approx. 4,285 acres) surrounds the City of Calipatria. Calipatria's land use plan is called the "2035 General Plan" and focuses on promoting social equality amongst all residents, infill development, a jobs/housing balance and increased economic development opportunities.[176] Current land use policies and future land use-related goals are also included within this plan. Land uses within the city of Calipatria consist of residential uses, with commercial uses concentrated along Main Street and industrial uses in the eastern half of the city. The City of Calipatria does not have agricultural lands within city limits; however, agricultural lands surround the City.

The goals and policies in this section set a path towards achieving the 2035 General Plan vision by locating jobs near housing, increasing the amount of land designated for job-generating commercial and industrial uses, and enhancing industrial and commercial development along transportation corridors. The four goals related to General Land Use are included below, with supporting policies available in the 2035 General Plan:[177]

1. Facilitate development of vacant and under-utilized land.
2. Provide an adequate mix of low-, medium-, and high-density residential land uses to house people of all socioeconomic levels.
3. Improve air and water quality and reduce energy consumption and greenhouse gas emissions.
4. Protect natural resources and agricultural lands.

The City of Calipatria has a five-member Planning Commission that meets once a month to discuss any relevant decisions and/or business related to proposed actions.[178] Calipatria's Planning Commission was a stakeholder when developing the 2035 General Plan.

[174] City of Brawley. 2008. Brawley Zoning Ordinance. Available at: https://www.brawley-ca.gov/assets/planning/zoning_and_ordinances/brawley-zoning-ordinance.pdf. Accessed: October 2024.
[175] City of Brawley. 2020. City of Brawley Official Zoning Map. Available at: https://www.brawley-ca.gov/assets/planning/zoning_and_ordinances/city-of-brawley-zoning-map.pdf. Accessed: October 2024.
[176] City of Calipatria. 2013. City of Calipatria 2035 General Plan. Available at: https://www.calipatria.com/media/managed/calipatria-2035-general-plan-september-20131.pdf. Accessed: October 2024.
[177] Ibid.
[178] City of Calipatria. 2024. Home. Available at: https://www.calipatria.com/. Accessed: October 2024.

Westmorland Land Use Policy

The Westmorland Urban Area (approx. 880 acres) surrounds the City of Westmorland. According to zoning maps, land within the boundary of Westmorland is classified as residential, commercial, industrial, or open space.[179] Similar to Calipatria, Westmorland does not have agricultural lands within city boundaries, but there are agricultural lands located in close proximity.

Westmorland's Zoning Ordinance[180] aims to balance the protection of public health and safety with the goal to encourage future growth and development of Westmorland. The City of Westmorland Planning, Building & Engineering Department reviews project applications, processing entitlements, and approvals to ensure that future decisions about development are aligned with the City's land use policies and proposed land use regulations.[181]

3.2.7 Identification of Existing and Potential Land Use Issues

The main concerns highlighted in the North End Phase 1 community nomination include proximity to transportation corridors, industry, the Salton Sea, and agricultural burning.[182] During CSC meetings held in 2023 and 2024, additional concerns expressed by the community related to land use included feedlots, geothermal plants, and the potential for future lithium extraction.

Industries in the Phase 1 North End Community include commercial agriculture and various industrial facilities in and around the Cities of Brawley, Calipatria, and Westmorland. Land use plans in these communities tend to be supportive of the existing industry and agricultural activities, which are crucial to achieving economic growth goals in these communities. The desire to foster economic growth, but also to promote social equity and public health can create conflicting priorities when it comes to potential expansion. From a land use perspective, some of the concerns expressed by community members, such as emissions from the Salton Sea, may not be solved by zoning laws.

3.2.8 Assessment of Compliance

Under federal and state law, ICAPCD is under legal obligation to establish and enforce air quality regulations. These regulations are primarily meant to ensure that the area meets federal and state air quality standards. ICAPCD also has authority to regulate toxic and hazardous air emissions from stationary sources. These regulations are enforced in the same manner as those which pertain to ambient air quality standards.

ICAPCD is also responsible for issuing permits, monitoring permitted and unpermitted facilities for compliance, responding to air quality complaints, and performing inspections at permitted facilities. As of 2023, there are 108 permitted facilities operating in the Phase 1 North End

[179] City of Westmorland. 2023. Westmorland City Zoning Land Use Map. Available at: https://www.cityofwestmorland.net/wp-content/uploads/2023/06/Zoning-Map-City-of-Westmorland.pdf. Accessed: October 2024.
[180] City of Westmorland. 2013. Ordinance No. 13-01. Available at: https://www.cityofwestmorland.net/wp-content/uploads/2023/03/Ordinance_13_01_Zoning_Ordinance_Amendments.pdf. Accessed: October 2024.
[181] City of Westmorland. 2024. Planning, Building, and Engineering. Available at: https://www.cityofwestmorland.net/departments/planning-building-engineering/. Accessed: October 2024.
[182] CARB. 2018. Imperial County AB617 Community Nominations (Submitted in partnership with Comite Civico del Valle, Inc.). Available at: https://ww2.arb.ca.gov/resources/documents/imperial-county-ab617-community-nominations-submitted-partnership-comite-civico. Accessed: October 2024.

Community, with a total of 138 permitted units. Of these 138 permitted units, 29% include combustion sources, 8% are service stations, 5% are facilities operating paint booths, 11% are beef feedlots, and 7% are geothermal facilities. The remaining 40% consist of non-retail stationary sources, manufacturing, and other types of facilities. Permitting and enforcement statistics are detailed in Appendix F.

ICAPCD performs inspections at all permitted facilities in the Phase 1 North End Community at least once per year. These inspections are intended to confirm that facilities are in compliance with air district rules and permit conditions. A total of 229 notices of violation (NOVs) and notices to comply (NTCs) were issued from 2021 to 2023 in the Phase 1 North End Community. Of those violations, approximately 56% were administrative in nature, including failure to submit annual reports, failure to apply for permits, and failure to submit fees. The remaining violations were related to dust and opacity (5%), open burns (11%), and other stationary source violations (27%). A non-compliance rate can be defined as:

$$\frac{Number\ of\ facilities\ receiving\ violations}{Total\ number\ of\ facilities}$$

Using this definition, the Community had an overall annual non-compliance rate between 17.6% and 29.6% from 2021 to 2023.[183]

[183] ICAPCD also tracks complaints that were filed for air quality concerns. Within the Phase 1 North End Community, 65 total complaints were filed between 2021 and 2023. Of these complaints, 25% were related to dust, 5% were related to open burning, and 11% were related to smoke. 49% of these complaints resulted in no findings, and 17% resulted in ICAPCD issuing a warning.

4. Targets and Strategies

The CAPP Blueprint requires selected communities to develop targets and strategies for achieving the objectives of their emissions reduction programs. Emission reduction targets must be specific and quantifiable in order to track progress over time. Furthermore, emission reduction targets must focus and accelerate actions to provide direct emissions reductions within the community to reduce exposure to TACs and $PM_{2.5.}$ Once emission reduction targets are established, strategies can be developed for achieving the targets. The strategies can include regulatory strategies, facility risk reduction audits, air quality permitting, enforcement strategies, incentive program strategies, and land use, transportation, and mitigation strategies. The emission reduction targets and strategies for the North End Phase 1 Community were developed based on information compiled from the technical assessment presented in Section 3, in consideration with the Steering Committee. Specific details regarding this Plan's targets and strategies are provided in the following sections.

4.1 Emission Reduction Targets

Emission reduction targets must be specific, quantifiable, measurable, and achievable within five years. The CAPP Blueprint provides a process for developing targets that meet the required criteria. This process includes the following steps:

1. Establish specific, numerical goals for compliance and deployment of technology and control techniques.
2. Calculate the estimated emissions reductions associated with these goals to establish emission reduction targets.

Of the 22 strategies presented in the following sections, one community-specific strategy as well as the CARB/Statewide strategies are expected to result in quantifiable reductions in emissions. These reductions are summarized in Table 4.1 below and comprise the emission reduction targets of this Plan. Additional strategies are also expected to result in emission reductions; however, due to their nature or the stage in their planning at the time of CERP preparation, the degree of emissions reductions to be achieved is currently unknown.

Table 4.1. Emission Reduction Targets

Strategy	Description	Estimated Emission Reductions 2030 (tons per year)					Estimated Emission Reductions 2035 (tons per year)				
		$PM_{2.5}$	PM_{10}	DPM	NOx	VOC	$PM_{2.5}$	PM_{10}	DPM	NOx	VOC
R-2	CARB/State Strategies	0.97	[a]	0.83	39.47	6.37	1.51	[a]	1.02	49.12	8.08
M-1	Parking Lot Paving Projects	[b]	[b]	--	--	--	[b]	[b]	--	--	--
M-7	Reducing Dust Emissions from Residential Yards	[b]	[b]	--	--	--	[b]	[b]	--	--	--
T-1	School Bus Replacement and Infrastructure[c]	--	0.004	0.004	0.094	0.009	--	0.005	0.005	0.096	0.010
	TOTAL	0.97	0.004	0.834	39.56	6.379	1.51	0.005	1.025	49.22	8.09

Notes:

[a] PM_{10} emissions are expected from the implementation of Strategy R-2 but were not estimated at this time.

[b] $PM_{2.5}$ and PM_{10} emission reductions are expected from the implementation of Strategies M-1 and M-7, but the number and size of paving projects has yet to be determined. Estimated reductions from an example paving project are provided in Appendix G, Table G.1.

[c] Emission reductions from Strategy T-1 shown assume a 1999 model year diesel bus is replaced with an electric bus in the indicated year (i.e., 2030 or 2035). DPM emission reductions for this strategy are assumed to be equal to the PM_{10} emission reductions. Additional reductions are expected if more than one bus is replaced. Estimated reductions and costs per bus are provided in Appendix G, Table G.2.

4.2 Compliance Goals

In the development of this Plan, ICAPCD performed a three-year retrospective review of compliance in the North End Phase 1 Community (see Section 5.2). This assessment showed that a total of 229 Notices of Violation (NOVs) and Notices to Comply (NTCs) were issued from 2021 to 2023. These violations were predominantly administrative in nature, but also included violations related to dust and opacity, open burns, and other stationary source violations. When considering the number of facilities receiving violations compared to the total number of facilities, the Community had an overall annual non-compliance rate between 14.8% and 29.6%from 2021 to 2023. In order to improve compliance within the North End Phase 1 Community, the District is proposing several enhanced enforcement strategies, as outlined in Section 5.3.1. While these strategies will likely improve compliance in the long term, it is unknown how directly the non-compliance rate will be tied to strategy implementation. For this reason, a compliance goal hasn't been established in this Plan. However, as noted in Section 6, the District will continue to track key compliance statistics, including the non-compliance rate.

4.3 Exposure Reduction Targets

Exposure to TACs and $PM_{2.5}$ may still be an issue in certain locations even with the implementation of the cleanest possible technologies. Sensitive receptors, such as children, the elderly, and individuals with certain medical conditions, are more vulnerable than the rest of the population. Examples of proximity-based exposure reduction goals include installation of air filtration systems at schools, use of vegetative barriers, and establishing new truck routes to avoid populated areas. In order to develop proximity-based goals, the Steering Committee identified sensitive receptor locations that are in close proximity to emissions sources and established measurable goals for implementing exposure reduction measures. A detailed discussion of sensitive receptor identification is provided in Section 3.2.9.

Of the 22 strategies presented in the following sections, 6 strategies are expected to directly reduce human exposure to pollutants. Table 4.2 below presents a summary of the proximity-based exposure reduction targets for this Plan.

Table 4.2. Exposure Reduction Targets

Strategy	Description	Targeted Pollutants	Exposure-Related Targets 2025-2030
M-2	Community Greening Projects	PM, NO_X	At least $200,000 in new projects
M-3	Air Filtration Systems	PM	At least $300,000 for air filtrations systems at sensitive receptor locations
M-4	Install Standalone Filters in Households	PM	At least $150,000 for residential air filters
M-5	Residential Duct Cleaning	PM	At least $200,000 in projects

Table 4.2. Exposure Reduction Targets

Strategy	Description	Targeted Pollutants	Exposure-Related Targets 2025-2030
M-6	School Flag Program/Marquee	PM, DPM, NO_X, VOC	At least $250,000 in projects
M-7	Reducing Dust Emissions from Residential Yards	PM	At least $200,000 in new projects

4.4 Reduction Actions and Implementation Schedule

ICAPCD and the Steering Committee have identified strategies necessary to meet the emission reduction targets and associated goals. These strategies establish a path towards continuing long term reductions in $PM_{2.5}$ and TACs. The strategies have been informed by the technical assessment of the types of sources contributing to elevated pollution levels, as well as the relative benefits and feasibility. Identified reduction strategies include regulatory strategies, facility risk reduction audits, air quality permitting, enforcement strategies, incentive program strategies, and transportation, and mitigation strategies. The identified strategies are separated into two categories:

- Tier 1 Strategies – Strategies with well-defined projects, where the project partners have been identified.
- Tier 2 Strategies – Strategies which require further study, planning, and stakeholder input prior to implementation.

Details on the identified strategies are in the following sections.

4.4.1 Regulatory Strategies

Types of regulatory strategies that were considered for inclusion in this Plan include identification of new District rules and regulations, a review of existing District policies, procedures, and outreach initiatives to identify areas of improvement for regulating dust emissions from agricultural activities during high wind events, and coordination with CARB to quantify the impact that proposed CARB regulatory measures/amendments could have on the Community.

R-1 - Identify Strategies to Mitigate Impacts from Agricultural Activities on Windy Days (Tier 1)

Under this strategy, the District and the CSC will identify potential ways to mitigate impacts from dust emissions from agricultural activities during windy days by reviewing existing District policies, procedures, and outreach initiatives for areas of potential improvement. In a survey conducted during the July 2024 CSC meeting, all members of the CSC and all public attendees who participated were interested in strategies to mitigate emissions from agricultural activities on windy days.

R-2 - CARB/State Strategies (Tier 1)

ICAPCD coordinated with CARB to identify state regulatory initiatives that, while not directly targeting Imperial County, would result in benefits to the Community when adopted. There are

currently at least ten proposed statewide measures that would result in emissions benefits within the Community:

2025 Mobile Source Strategy - The 2025 Mobile Source Strategy outlines CARB's plan to reduce emissions from vehicles and equipment by transitioning to cleaner technologies. It supports California's air quality and climate goals, with a focus on public health and environmental justice. For more information, visit: *https://ww2.arb.ca.gov/resources/documents/2025-mobile-source-strategy*.

Cargo Handling Equipment Regulation to Transition to Zero-Emissions - CARB plans to amend the Cargo Handling Equipment regulation to require zero-emissions technology at seaports and railyards, replacing diesel and other combustion-powered equipment like yard trucks and forklifts. The amendments may include an implementation schedule for new equipment and infrastructure, prioritizing early adoption in communities most impacted by air pollution. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/cargo-handling-equipment*.

Clean Off-Road Fleet Recognition Program - CARB's voluntary program would encourage fleets to adopt advanced technology and zero-emission vehicles (ZEVs) beyond regulatory requirements, using a rating system to reflect their progress. The program would offer incentives such as access to jobs, public recognition, and marketing opportunities, motivating fleets to exceed standard practices as zero-emission technology becomes more available.

Composite Wood Products Control Measure Amendments - This strategy will amend the CARB Composite Wood Products Airborne Toxic Control Measure (ATCM), approved in 2007. The Composite Wood Products ATCM established formaldehyde emission standards for three types of composite wood products (hardwood plywood, particleboard, and medium-density fiberboard) and requires that all consumer goods that contain such materials (e.g., flooring, cabinets, furniture) destined for sale in California must comply with the Composite Wood Products ATCM. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/composite-wood-products-program*.

Off-Road Zero-Emission Targeted Manufacturer Rule - CARB plans to propose a regulation in 2027 requiring off-road equipment manufacturers to sell a percentage of zero-emission (ZE) equipment annually. This measure aims to increase ZE options in the off-road sector and support initiatives that encourage or mandate the adoption of cleaner technologies.

Oil and Gas Amendment - The proposed amendments to the Oil and Gas Methane Regulation aim to enhance methane emission reductions by transitioning to zero-emission pneumatics, banning associated gas venting, and tightening leak detection thresholds. Additional requirements include stricter reporting, compliance plans, and revisiting the heavy oil exemption for leak detection and repair. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/oil-and-natural-gas-production-processing-and-storage*.

On-Road Motorcycle Emissions Standard Amendment - CARB's updated On-Road Motorcycle (ONMC) proposal aims to reduce emissions by aligning with global standards, promoting Zero-Emission Motorcycles (ZEMs), and implementing stricter evaporative emission controls. The proposal balances adopting both ZEM and internal combustion engine (ICE) technologies while ensuring long-term durability of emissions control systems to meet California's

air quality goals. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/on-road-motorcycles*.

Tier 5 Off-Road New Compression-Ignition Engine Standard - CARB is proposing Tier 5 amendments to significantly tighten emission standards for off-road diesel engines, targeting a 90% reduction in NOx and 75% in PM, while introducing CO_2 standards for the first time. These changes aim to improve air quality, with implementation set for 2029 and enhanced compliance measures. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/tier5*.

Transport Refrigeration Unit Regulation Part 2 - CARB's new regulation for Transport Refrigeration Units (TRUs) aims to reduce emissions by transitioning diesel-powered TRUs to zero-emission technology. The regulation focuses on improving public health near distribution centers and meeting California's climate goals, with new standards being implemented in phases. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/new-transport-refrigeration-unit-regulation*.

Zero-Emission Standard for Space and Water Heaters - CARB's Zero-Emission Space and Water Heater Standards aim to reduce greenhouse gas emissions and NOx from building-related sources, supporting California's climate and air quality goals. The standards focus on transitioning to zero-emission technologies while ensuring affordability, equity, and health benefits for communities statewide. For more information, visit: *https://ww2.arb.ca.gov/our-work/programs/zero-emission-space-and-water-heater-standards.*

ICAPCD will continue to coordinate with CARB to identify state regulatory amendments that could result in benefits to the Community. Each new regulatory amendment will be reviewed for public health and clean air benefits, cost-effectiveness, and air quality and attainment benefits.

4.4.2 Facility Risk Reduction Audits

AB 617 requires air districts to perform assessments of facilities that are subject to the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) in order to determine which have risk reduction audits and emission reduction plans that could be reviewed and updated. Specifically, AB 617 authorizes air districts to reopen existing plans in order to strengthen them.

AB 2588, enacted in 1987, requires stationary sources to report the types and quantities of certain pollutants released into the air.[184] Reportable emissions include, but are not limited to, continuous releases, intermittent releases, and those resulting from process upsets or leaks. The purpose of AB 2588 is to collect emissions data in order to identify facilities that have localized impacts or an elevated risk of adverse health effects. Air districts are required to prioritize facilities based on the submitted emission inventories, and place them in one of three categories: high, intermediate, or low priority.

In categorizing a facility as high, intermediate, or low priority, ICAPCD considers the potency, toxicity, and magnitude of emissions released from the facility, and the proximity of the facility to the nearest receptor. If the prioritization score indicates further evaluation is necessary, the facility is required to perform a health risk assessment (HRA). If the results from the HRA indicate a

[184] CARB. Overview of the Air Toxics "Hot Spots" Information and Assessment Act. Available at: https://www.arb.ca.gov/ab2588/overview.htm. Accessed: October 2024.

potential significant risk to the public, the facility is required to notify the public exposed to the emissions. A facility subject to the public notification requirement then may need to develop a risk reduction plan to lower the emissions below significance levels. After complying with the initial reporting requirements, based on the prioritization scores or HRA results, facilities may be required to submit updated reports every four years.

Facilities within the North End Phase 1 Community and directly surrounding the Community that are subject to AB 2588 are listed in Appendix D.[185] Table 4.3 lists the total number of facilities classified as a given priority category.

Table 4.3. Categorization of AB 2588 Facilities within or directly surrounding the North End Phase 1 Community - Brawley, Westmorland, Calipatria

Priority Score Category	Number of Facilities
High	1
Intermediate	22
Low	97

The majority of facilities in the North End Phase 1 Community are designated as low priority, which means that the owners/operators are not required to perform risk reduction audits or submit emission reduction plans. For those higher priority facilities that may have performed risk reduction audits or submitted emission reduction plans, the District will review these and determine if there are opportunities to update them to further reduce emissions and associated health risks.

4.4.3 Enforcement Strategies

Enforcement of rules and regulations in the Phase 1 North End Community is the responsibility of CARB and District staff. Many improvements to enforcement-related processes can be implemented without requiring new regulatory action, thus presenting an opportunity to rapidly address Community concerns and deliver emission reductions. In conjunction with the development of this Plan, both the District and CARB conducted a three-year retrospective review of enforcement activities in the Community, the results of which are discussed in Section 5.2. The retrospective review allowed the District and CARB to identify opportunities for enhanced enforcement activities. Under this Plan, the District is proposing to:

- Provide cross-agency training to improve violation response time (E-1, Tier 1).
- Increase community outreach by providing industry-specific workshops and trainings (E-2, Tier 1).

[185] CARB. Facility Search Engine. Available at: https://ww2.arb.ca.gov/applications/facility-search-engine. Accessed: October 2024.

- Publish a quarterly newsletter that includes information on enforcement statistics and rule changes. APCD may use information in newsletters in order to identify areas of potential improvement and focus. (E-3, Tier 1).
- Form a dedicated outreach team to understand the community's enforcement-related concerns (E-4, Tier 1).
- Commit to inspecting construction sites for projects lasting longer than 30 days that have a dust control plan (E-5, Tier 1).
- Communicate strategic updates to ICAPCD Policy 15, *Burning of Residential Green Waste* (E-6, Tier 1).

Section 5.3.1 contains detailed descriptions of the above enforcement strategies. The enforcement strategies are expected to result in improved compliance; however, the potential emission reductions associated with these strategies are not readily quantifiable.

4.4.4 Incentives-Based Strategies

Incentive funding programs support the introduction and expedited deployment of clean technologies beyond regulatory requirements. These technologies can contribute to improvements in regional and local air quality.

4.4.4.1 Existing Funding Programs

As discussed in Section 3.2.2, there are several incentive programs that are currently being administered by the District within Imperial County. These include: the Carl Moyer Program, which provides financial incentives and funding for the replacement of older on-road vehicles and other equipment, the FARMER Program, which provides funding for the replacement of older agricultural equipment, the Lawn Equipment Exchange Program, which provides discounts on zero-emission lawn equipment, and other general funding programs for various types of projects in the County. The District intends to continue administering these programs as long as funding and projects are available and will look for opportunities to leverage the funds from these programs for strategies in this Plan, when synergies exist. Information on the emission reductions achieved to date through these programs is provided in Section 3.2.6.

4.4.5 Outreach Strategies

Updates will be provided as available to keep the public informed on the various programs available for funding emission reduction and exposure projects within the Community. This information will be communicated during the regular Steering Committee meetings, when the public and Steering Committee members can discuss new opportunities and the Community's potential involvement. Additionally, resources will be provided on the Imperial County AB 617 website regarding specific programs and planned or potential participation by the County or Community. For programs which may have widespread applicability to businesses or individuals in the Community, the Steering Committee will collaborate with ICAPCD to host interactive workshops to inform the public on how they can be involved or receive funding for the program's emission reduction efforts.

O-1 - Air Justice at Schools (Tier 1)

Under this strategy, the District proposes to host Air Justice (AJ), an educational program on air quality and environmental justice, at least once per year at participating schools in the North End over a 5-year period from 2025 to 2030. The purpose of this program is to educate students, with the objective of reducing their exposure to emissions. 100% of CSC members and 83% of public attendees who participated in the July 2024 CSC survey designated this program as "High Priority" for inclusion in the CERP. The District will offer this strategy to all of the schools within the North End and may extend this strategy to schools outside of the North End.

O-2 - Project ACE (Tier 2)

The District proposes to allocate funding for a career technical teacher for Project Air Community Education (ACE), the environmental health literacy program of Imperial County, for a 5-year period. This program would be similar to the existing ACE program for the El Centro–Heber-Calexico Corridor. As part of the July 15, 2024 CSC survey, approximately 78% of CSC members and 100% of public attendees who participated in the survey designated Project ACE as a "High Priority" item for inclusion in the CERP.

At the July 2024 CSC meeting, the District specified that Project ACE occurs over two months. During this period, students would learn about air quality, enforcement-related issues in the North End, and where to find air quality tools, as well as participate in related educational activities. This program would be implemented in the North End only after confirming interest from teachers within the Community. Students will receive a certificate upon completion of the program, and completion of projects throughout the program may be incentivized through rewards such as gift cards. Program duration and continuation would be dependent on teacher interest.

O-3 - Alternative to Agricultural Burning (Tier 1)

Between 2013 and 2021, over thirty Imperial Valley schools were located within three miles of frequent agricultural burning sites, with six schools experiencing an average of ten or more burns annually, as identified in a collaborative study between the University of Southern California and CCV.[186] Conclusions from the study indicated that children living near areas where agricultural burning occurs in Imperial Valley had a higher prevalence of wheezing, sneezing, and bronchitis symptoms than children living further from permitted burns.

Agricultural burning is currently regulated under ICAPCD Rule 701, Agricultural Burning, which requires permits and notices of intent specifying the fields to be burned before burning, and prohibits burning on no-burn days. Under this strategy, the District plans to commence an education and outreach program to inform local farmers of existing programs available to reduce agricultural open burning, such as the District's Agricultural Burning Emission Reduction Credit (ABERC) Program. 100% of CSC members and 50% of public attendees who participated in the July 2024 CSC survey identified potential alternatives to agricultural burning as "High Priority" for inclusion in the CERP.

[186] Kamai et al. 2023. Agricultural burning in Imperial Valley, California and respiratory symptoms in children: A cross-sectional, repeated measures analysis. Available at: https://www.sciencedirect.com/science/article/pii/S0048969723044790?ref=pdf_download&fr=RR-2&rr=8a7e2c937daa434b. Accessed: October 2024.

O-4 - Pesticides (Tier 2)

VOC emissions from pesticides used in agricultural and urban environments are concerns of the North End Phase 1 Community. 86% of CSC members and 100% of public attendees who participated in a survey conducted during a CSC meeting on September 23, 2024, approved of including a CERP strategy involving working with the Department of Pesticide Regulation (DPR) regarding pesticides in the Community. Under this strategy, the District proposes to work with DPR, as well as the Imperial County Agricultural Commissioner to promote community awareness regarding the pesticide regulatory process, existing policies and regulations, new developments, and pesticide use and enforcement in and around the Community and statewide. The District will maintain a line of communication between the CSC and these agencies to promote education and awareness on pesticide-related matters and ensure that community concerns are heard.

4.4.6 Transportation Strategies

In the North End Phase 1 Community, the proximity of mobile emission sources to nearby sensitive receptors such as schools, homes, day care centers, and hospitals can exacerbate the cumulative exposure burden. Transportation planning processes can help address these proximity issues. The community-level emissions inventory found that on-road mobile sources contribute approximately 0.3% of the $PM_{2.5}$ emissions total. Additionally, the source attribution analysis found that 10% of directly-emitted $PM_{2.5}$ emissions in the community are from dust from vehicle travel on unpaved roads.

T-1 - School Bus Replacement and Infrastructure (Tier 1)

School buses frequently operate on diesel and often operate in close proximity to sensitive receptors, like students. Results from the July 15, 2024 CSC meeting survey showed that approximately 67% of CSC members and 100% of public attendees that participated were in favor of implementing school bus replacement projects in the North End Phase 1 Community. At the CSC meeting on August 19, 2024, community members from Brawley, Calipatria, and Westmorland highlighted the need for also developing charging infrastructure for electric buses. Because community members expressed the potential need for additional funding from AB 617 CAP Incentive funds to supplement funding from existing statewide programs, this strategy will seek to provide co-funding opportunities for school bus replacement projects. This strategy will also include periodic review of grant opportunities and programs available to fund school bus replacements. In addition, based on CSC feedback, this strategy will also allow for funding for electric and hydrogen fuel cell school bus infrastructure with a minimum funding allocation of $600,000. Estimated emission reductions and costs per bus are provided in Appendix G, Table G.2.

Project requirements will follow those listed in Section C of Appendix A of CARB's Community Air Protection Incentive Program Guidelines.

T-2 - Promote Public Transportation (Tier 2)

Under this strategy, the District and the CSC propose to partner with local public transportation operators to advocate for service improvements in the North End, such as more frequent stops, reduced fares, and an improved schedule. In the July 2024 CSC survey, 100% of CSC members and 100% of public attendees who participated in the survey designated this strategy as "High

Priority" for inclusion in the CERP. The improvements could include funding allocations for new specialized short bus or electric shuttle routes. Ultimately, the District and CSC will identify priorities for public transit improvements and may discuss these priorities at the annual discussion on unmet needs held by the Imperial County Transportation Division. Metrics for tracking progress on this strategy include tracking the number of meetings with public transportation operators attended by the District and/or CSC members.

T-3 - Idling Education and Outreach (Tier 1)

Under this strategy, the District proposes to partner with CARB to conduct education and outreach to reduce the amount of idling in the North End Phase 1 Community. 86% of CSC members and 100% of public attendees who participated in the September 2024 CSC survey approved of this strategy. The District is proposing to conduct at least one workshop for local businesses that have heavy-duty truck fleets operating in the Community. If interest and attendance is favorable, training sessions would continue to be scheduled yearly through 2030. Metrics for tracking progress on this strategy include tracking the date, topic, and number of attendees for each public workshop.

4.4.7 Mitigation Strategies

As discussed in Section 3.2.5, at least 55 sensitive receptor locations have been identified in the North End Phase 1 Community. These entities, and the broader Community, are exposed to elevated concentrations of pollutants on a daily basis as the Community exists in an area that is designated as nonattainment for the 8-hour O_3 and 24-hour and annual $PM_{2.5}$ NAAQS. As discussed in Section 3, a variety of emission sources contribute to the exposure burden. The community-level emissions inventory, presented in Section 3.2.1.4 shows that the top three contributors to $PM_{2.5}$ emissions in the Community are fugitive windblown dust (which can originate from open areas), farming operations, and unpaved road dust. Top contributors to TACs in the Community are DPM from off-road mobile sources and cobalt from fugitive windblown dust emissions. Ultimately, health protective mitigation measures and practices can help reduce the exposure burden of a community.

M-1 - Fund Paving Projects (Tier 1)

Fugitive windblown dust and unpaved road dust are top contributors to PM_{10} and $PM_{2.5}$ emissions in the North End Phase 1 Community. Paving is one approach to reducing emissions from these source categories. Under this strategy, the District is proposing to fund paving projects within the North End with a minimum funding allocation of $800,000. The locations and priority of these projects would be informed by input from the Steering Committee. At the CSC meeting on August 19, 2024, community members from Brawley, Calipatria, and Westmorland identified several potential unpaved areas that could be among the first projects completed under this strategy. $PM_{2.5}$ and PM_{10} emission reductions are expected from the implementation of Strategy M-1, but the number and size of paving projects has yet to be determined. Estimated emission reductions and costs from an example paving project are provided in Appendix G, Table G.1.

Project requirements will follow those listed in the Chapter 12 of CARB's Community Air Protection Incentive Program Guidelines.

M-2 - Fund Community Greening Projects (Tier 1)

Community greening projects (also known as “green space” or “urban greening” projects) establish and enhance the built environment by using natural solutions to mitigate air quality impacts. The results from the July 2024 CSC meeting survey showed that approximately 100% of public attendees and 78% of CSC members who participated were in favor of implementing community greening projects. Under this strategy, the District is proposing to initially designate a minimum of $200,000 in AB 617 funding towards the implementation of community greening projects within the North End. The location and priority of these projects would be informed by input from the CSC. Applicants proposing to upgrade parks or play areas would be prioritized for funding, as suggested by the CSC in their responses to the July 2024 survey.

Project requirements will follow those listed in the Chapter 10 of CARB’s Community Air Protection Incentive Program Guidelines.

M-3 - Air Filtration System (Tier 1)

Air filtration systems have been shown to be effective in significantly reducing concentrations of diesel particulate matter (DPM), particulate matter, and other pollutants in the indoor environment. Fugitive windblown dust is the largest contributor of PM emissions in the North End community. Emissions from windblown dust near the Salton Sea were identified as a concern during the December 8, 2023, January 29, 2024, and February 26, 2024 CSC meetings. As one effort to mitigate potential exposure to ambient particulate matter concentrations, air filtration strategies were proposed for inclusion into the CERP. Results from the July 2024 CSC meeting survey showed that approximately 83% of public attendees and 100% of Steering Committee members who participated identified implementing air filtration projects at schools and sensitive receptor locations as a “High Priority” strategy for inclusion in the CERP. Under this strategy, the District is proposing to install air filtration systems at sensitive receptor locations using a minimum funding allocation of $300,000. The type and location of the air filtration projects would be informed by input from the Steering Committee.

Project requirements will follow those listed in Chapter 5.D of CARB’s Community Air Protection Incentive Program Guidelines.

M-4 - Install Standalone Filters in Households (Tier 1)

Fugitive windblown dust is the largest contributor of PM emissions in the North End community. Emissions from windblown dust near the Salton Sea were identified as a concern during the December 8, 2023, January 29, 2024, and February 26, 2024 CSC meetings. As one effort to mitigate potential exposure, air filtration strategies were proposed for inclusion into the CERP. Under this strategy, the District plans to identify funding to install and maintain air filtration systems in homes near emission sources to reduce exposure to dust emissions. 100% of CSC members and 83% of public attendees who participated in the July 2024 CSC survey designated this program as “High Priority” for inclusion in the CERP. These systems would be standalone units and not integrated into heating, ventilation, and air conditioning (HVAC) systems (like those proposed under the “Air Filtration System” strategy). The District is proposing a minimum funding allocation of $150,000 for this strategy. Income requirements will be included as one of the criteria for funding applicants.

Project requirements will follow those listed in Chapter 5.D of CARB's Community Air Protection Incentive Program Guidelines.

M-5 - Residential Duct Cleaning (Tier 1)

Residential duct cleaning offers a multitude of benefits to residents, primarily by improving indoor air quality. Regular duct cleaning reduces the accumulation of dust, allergens and other pollutants in the HVAC systems of homes, which can significantly alleviate respiratory problems and allergic reactions among inhabitants. Results from the July 2024 CSC meeting survey showed that approximately 78% of Steering Committee members and 83% of public attendees who participated were in favor of implementing a CERP strategy related to residential duct cleaning in North End households. Under this strategy, the District will partner with a contractor(s) selected through a Request for Proposals (RFP) bidding process to offer up to $2,000 per household for air duct cleaning with a minimum funding allocation of $200,000. Income requirements will be included as one of the criteria for funding applicants.

M-6 - School Flag/Marquee Program (Tier 2)

The School Flag Program in Imperial County uses colored flags based on USEPA's Air Quality Index to notify teachers, coaches, students, and others about outdoor air quality conditions. Schools raise a colored flag each day that corresponds to the local air quality forecast. The purpose of the program is to create public awareness of outdoor air quality conditions and allow schools, coaches, and parents to make decisions on air pollution exposure, including whether it is appropriate for children to exercise outside on any given day. Under this strategy, the program will be enhanced to use electronic marquee signs instead of physical flags for ease of updating the messaging and for consistent visibility.

The results from the September 2024 CSC meeting survey showed that 100% of CSC members and 100% of public attendees who participated approved of the School Flag/Marquee Program. Under this strategy, the District is proposing to assist as many schools as funding permits in the Community in implementing the school marquee program with a minimum funding allocation of $250,000. Specifically, the District would provide the materials and training necessary for successful implementation.

Project requirements will follow those listed in Chapter 5.E of CARB's Community Air Protection Incentive Program Guidelines.

M-7 - Reducing Dust Emissions from Residential Yards (Tier 2)

The North End Phase 1 Community contains residential dirt yards that generate fugitive windblown dust, which is the largest contributor of PM emissions in the community. A strategy to reduce dust emissions from such yards was proposed during the September 23, 2024 CSC meeting. Under this strategy, the District would partner with a contractor(s) to offer gravel delivery and/or application to cover residential yards for community residents with a minimum funding allocation of $200,000. Income requirements will be included as one of the criteria for funding applicants. This strategy would reduce both water use and fugitive dust emissions. $PM_{2.5}$ and PM_{10} emission reductions are expected from the implementation of Strategy M-7, but the number and size of paving projects has yet to be determined.

5. Enforcement Plan Requirements

5.1 Enforcement Overview

Enforcement of regulations established by CARB and ICAPCD staff is critical to achieving air quality goals. The primary function of enforcement activities is to improve compliance with air quality rules and regulations. Enforcement responsibilities for regional and local air quality issues are jointly shared between the District and CARB. CARB is primarily responsible for the enforcement of mobile source rules, while the District is responsible for area-wide and stationary source enforcement. In some cases, CARB has established memoranda of understanding with the ICAPCD to delegate enforcement authority.

5.1.1 ICAPCD Enforcement Overview

The ICAPCD Enforcement Division consists of six compliance and enforcement personnel, including four compliance inspectors, one air quality specialist, and one manager. Enforcement officers perform inspections of facilities holding permits to determine compliance with District rules and regulations, permit conditions, and state and federal rules on an annual basis. Each permit is a written authorization by ICAPCD to install and operate equipment that emits or controls emissions of air contaminants. The permit contains conditions under which the equipment can be operated, including limits on material use or operation time, and/or recordkeeping requirements, as applicable. During these inspections, the inspector reviews processes and operations to determine compliance status. The inspector also reviews the facility's permit to determine its compliance status with each condition. Inspectors also conduct inspections on units registered through CARB's Portable Equipment Registration (PERP) program. In addition to annual inspections of permitted facilities, the ICAPCD has the goal to conduct inspections twice a year at major sources of pollution, and geothermal facilities.

Additionally, the Enforcement Division investigates all air quality complaints. Complaints can be filed through the District's general phone number (1-442-265-1800) or website[187], the Cal-EPA website,[188] or the CARB website.[189] Imperial County residents may also file environmental reports online through the IVAN Imperial website.[190] Complaints made through the IVAN Imperial website are currently monitored by the Imperial County Certified Unified Program Agency (CUPA), who then directs the complaints to the appropriate agencies. To ensure the quickest response time possible, the IVAN website requests that air pollution complaints first be submitted directly to the District by calling the District hotline before submitting a report. The District's general phone number is active during business, non-business, weekend, and holiday hours. The District logs the call and then assigns the complaint to an inspector. Every complaint received by ICAPCD is investigated within 24 hours of receipt. During regular business hours, complaints are assigned to area inspectors as soon as possible. Enforcement personnel contact all complainants, unless the complainant has indicated otherwise or has filed an anonymous complaint. Enforcement

[187] ICAPCD. 2020. Compliance. Available at: https://apcd.imperialcounty.org/compliance/#aircomplaint. Accessed: October 2024.
[188] CalEPA. 2024. Environmental Complaint System. Available at: https://calepa.my.salesforce-sites.com/complaints/Complaint. Accessed: October 2024.
[189] CARB. 2024. Environmental Complaints. Available at: https://ww2.arb.ca.gov/environmental-complaints. Accessed: October 2024.
[190] Ivan Imperial. 2024. Submit a Report. Available at: https://ivan-imperial.org/report. Accessed: October 2024.

officers record details of all complaint investigations, including a statement from the complainant, the date and time of contact, whether the contact was in person or by telephone, whether the complaint was confirmed, the location of the area inspected, and additional details as needed. This information is maintained within the District's archives.

During facility inspections and in response to complaints, enforcement officers issue NTCs for minor compliance issues and NOVs for more serious compliance issues, as necessary. These notices serve as a deterrent for non-compliance and occasionally have fines associated with them.

5.1.2 CARB Enforcement Overview

The California Air Resources Board's (CARB) Enforcement Division aims to continue its work and partnerships with community groups within North Imperial County to develop community-focused plans to reduce the pollution disparity communities feel. CARB enforces programs designed to reduce emissions from mobile sources, consumer products, fuels, and other sectors. These programs aim to achieve compliance through every regulation adopted by CARB. By enforcing these regulations, CARB can hold responsible parties accountable and deter future violations.

In 2017, CARB updated its enforcement policy which applies to all enforcement programs and describes CARB's enforcement-related policies. The enforcement process begins once CARB has identified a potential violation. Information obtained from inspections and various databases allows CARB to identify potential violations and initiate an investigation. Field inspectors are a crucial part of CARB's enforcement program as they are staff who go out to inspect vehicles and equipment for compliance with CARB regulations. Once an investigation begins, investigators contact the responsible party and determine the cause of noncompliance. CARB will then work with the responsible party to ensure compliance is achieved and will determine an appropriate penalty as described in law and in CARB's enforcement policy. CARB seeks to resolve violations through a mutually agreeable settlement process. If a mutually agreeable settlement cannot be reached, CARB may refer the matter to the Attorney General for civil litigation.

CARB's enforcement activities can be found using the Enforcement Data Visualization System (EDVS).[191] Additional information can be found in CARB's 2023 Executive Summary of Enforcement Activities,[192] as well as Appendix H to this Plan.

5.2 Three-Year Retrospective Reviews of Enforcement

Both the District and CARB conducted a three-year retrospective review of enforcement in the Community to inform the development of targets, strategies, and the enforcement plan. Ultimately, this review included a summary of complaints received and their resolutions, a listing of permitted facilities and their types, the number and type of inspections conducted, a list of Notices of Violation and Notices to Comply issued, an assessment of compliance with CARB and District rules and regulations, and a discussion of opportunities for enhanced enforcement activities.

[191] CARB. Enforcement Data Visualization System (EDVS). Available at: https://webmaps.arb.ca.gov/edvs/. Accessed: November 2024.
[192] CARB. Enforcement Data Portal. Available at: https://ww2.arb.ca.gov/our-work/programs/enforcement-policy-reports/enforcement-data-portal. Accessed: November 2024.

5.2.1 ICAPCD Enforcement Review

ICAPCD prepared a three-year retrospective review to help inform development of strategies to enhance enforcement in the District. There are currently 108 ICAPCD permitted facilities operating within the North End Phase 1 Community and a total of 138 permitted emission units. The permits at these facilities cover a wide range of operations, including combustion, spraying of coatings, service stations, beef feedlots, and geothermal energy. ICAPCD's goal is to perform inspections at all permitted facilities in the Phase 1 North End Community at least once per year. Between 2021-2023, the District issued 97 NTCs and 139 NOVs to the facilities within the Community. Of those violations, approximately 56% were administrative in nature, including failure to submit annual reports, failure to apply for permits, and failure to submit fees. The remaining violations were related to dust and opacity (5%), open burns (11%), and other stationary source violations (27%). A non-compliance rate can be defined as:

$$\frac{Number\ of\ facilities\ receiving\ violations}{Total\ number\ of\ facilities}$$

Using this definition, the Community had an overall non-compliance rate between 17.6% and 29.6% from 2021 to 2023.

ICAPCD received a total of 65 complaints in the North End Phase 1 Community from 2021 to 2023. 41% of these complaints were related to dust, open burning, and smoke, while 49% were related to odors. These complaints predominantly resulted in issuance of warnings, for situations when nothing is found upon inspection. Appendix F contains tables detailing the results of the three-year retrospective review of enforcement.

Based on the 3-year retrospective review, there are a number of opportunities for enhanced enforcement in the North End Phase 1 Community. As discussed above, the emissions-related NOVs and NTCs were written predominantly for stationary source and service station administrative non-compliance, and also include dust and opacity, and open burning. ICAPCD intends to increase the compliance rate long term through the enhanced enforcement measures described in Section 5.3 below.

5.2.2 CARB Enforcement Review

CARB prepared a three-year retrospective review of enforcement activities in the Community. The following sections contain a description of programs implemented in the Community by CARB for the years 2021 through 2023. This report includes compliance rate results.

Heavy-Duty Diesel Vehicles

CARB has established emission requirements that new diesel vehicles must adhere to. These requirements require engine manufacturers to meet the lowered emission standards for particulate matter (PM) and nitrous oxide (NO_X). Manufacturers began installing diesel filters and exhaust aftertreatment in Heavy-Duty Diesel Trucks (HDDTs) to meet the requirements. These practices are responsible for removing more than 98% of toxic emissions from HDDTs. Furthermore, through diesel fleet regulations, CARB requires the replacement of older, high-polluting vehicles and equipment with cleaner-emitting vehicles and equipment. These

regulations target on-road and off-road diesel vehicles, diesel equipment, transportation refrigeration units, and other sources. CARB has also developed inspection and maintenance regulations to ensure emission systems function correctly while in-use. In December 2021, The Board approved the Clean Truck Check program to identify vehicles that need emission-related repairs and ensure those repairs occur. Implementation of the Clean Truck Check program began in January 2023 and is aimed at all non-gasoline vehicles in California with a gross weight greater than 14,000 pounds and requires them to undergo periodic emissions testing. The emissions testing requirements help ensure that heavy-duty vehicles operating in California continue to have functioning emission controls and faulty equipment is promptly addressed. Those who are found not to be compliant will have a hold placed on their DMV registration and be subject to an annual compliance fee. This program is projected to reduce statewide NO_X and PM emissions by 81 tons and 0.7 tons by 2037 respectively.

Table 5.1. CARB Diesel Inspections in Imperial between 2022-2024.

Inspection Type	2022		2023		2024	
Clean Truck Check	**Inspections**	**Citations**	**Inspections**	**Citations**	**Inspections**	**Citations**
DEF	4	-	4	-	-	-
ECL	82	13	47	5	80	13
CTC Reporting	-	-	-	-	8	-
MIL Status	12	-	13	9	33	9
OBD Faults	-	-	5	3	26	9
Smoke Opacity	87	15	48	6	68	4
Refusal	1	1	10	-	14	-
Tampering	49	9	22	4	42	6
Smart Way	6	-	-	-	-	-
Truck and Bus	79	4	32	9	69	13
TRU	50	31	2	-	7	5
Idling	417	16	16	-	56	-
Total	787	42	181	36	340	54

Table 5.2. Diesel Inspections Conducted in North Imperial County Between 2021-2023.

Programs	Number of Inspections		
	2021	2022	2023
HDVIP-Emission Control Label	1	0	0
HDVIP-Smoke Opacity	0	0	0
HDVIP-Tampering	1	0	0
Idling	33	43	43
Off-Road	0	0	0
SmartWay	0	0	0
Transport Refrigeration Unit	1	0	4
Truck and Bus	0	0	0

Table 5.3 Compliance Rate for the Diesel Inspections Conducted in North Imperial County Between 2021-2023

Programs	Compliance Rate		
	2021	2022	2023
HDVIP-Emission Control Label	100%	N/A	N/A
HDVIP-Smoke Opacity	N/A	N/A	N/A
HDVIP-Tampering	0%	N/A	N/A
Idling	97%	95.3%	100%
Off-Road	N/A	N/A	N/A
SmartWay	N/A	N/A	N/A
Transport Refrigeration Unit	0%	N/A	25%
Truck and Bus	N/A	N/A	N/A

Truck and Bus Rule

By January 2023, nearly all trucks and buses in California will already or will be required to have 2010 or newer model engines to operate legally in California. Additionally, vehicles must comply with this requirement to be registered by the California Department of Motor Vehicles (DMV). Failure to do so will result in registration holds and will prevent non-compliant trucks from operating in California. According to DMV data, in January 2024, vehicles registered in the North Imperial zip codes had a 93.14% compliance rate for heavy-duty diesel vehicles and 93.65% for light-duty vehicles.

Portable Emission Acquisition System (PEAQS)

The Portable Emission Acquisition System (PEAQS) is an emission screening tool that captures real-time exhaust emissions from trucks as they pass through. The tool can detect black carbon, carbon dioxide, and oxides of nitrogen (NOx). This tool includes an Automated License Plate Reader (ALPR) camera that helps identify which vehicle belongs to which emission reading, along with piping that draws air into and above the road with a vacuuming system that reads emissions as vehicles pass. A computer provides live readings to CARB Enforcement as they monitor the results. CARB Enforcement will work with California Highway Patrol (CHP) to pull over vehicles that show an unusual spike. CHP can also pull over older vehicles that do not pass through PEAQS for random inspections.

Table 5.4 Deployment of PEAQS in Westmorland in 2022 and 2023

Year	Location	Vehicles Screened	Vehicles Inspected	Citations Issued
2022	Westmorland	1659	57	33
2023	Westmorland	298	16	8

Fuels

To maximize emission reductions from mobile sources, CARB sets stringent standards for California fuel that produces cost-effective emission reductions from motor vehicles. With fuels, there are two categories that CARB mainly focuses on:

1) Adopting and enforcing fuel specifications
2) Controlling emissions from marketing and distribution

No fuel inspections have been conducted in North Imperial County. CARB will work on coordinating fuel inspections in the community.

Consumer Products

Consumer products pose a risk to community members. Toxic air contaminants (TACs) and volatile organic compounds (VOCs) can be found in home products like hairsprays, deodorants, and flooring. Inspections are a crucial part of achieving the regulatory goals set by CARB.

No consumer products inspections have been conducted in North Imperial County. CARB will work on coordinating consumer products inspections in the community.

Complaints Investigation

Potential air quality violation complaints can provide important information to CARB.[193] Every report is taken seriously and investigated by CARB. Although details from pending investigations can't be shared with the public, CARB aims to resolve every incoming complaint. Providing as much information as possible is critical to starting an investigation. CARB can refer the complaint to another agency with jurisdiction, depending on the nature of the complaint. Between 2021-

[193] CARB. Environmental Complaints. Available at: https://ww2.arb.ca.gov/environmental-complaints. Accessed: November 2024.

2023, CARB received two mobile source complaints from the North Imperial community, both of which were for the Periodic Smoke Inspection Program (PSIP). CARB also received nine non-mobile complaints from the North Imperial County communities between 2021-2023. All nine complaints were referred to ICAPCD for evaluation.

Raising community awareness of the resources available to them is an integral part of AB 617. Reporting potential violations empowers the community to take an active interest in the general well-being of their community. ICAPCD and CARB rely on the community to identify areas that often go unnoticed or unaddressed. CARB works to address every single complaint as soon as the complaints come in.

Supplemental Environmental Projects

Supplemental Environmental Projects (SEPs) are community-based projects funded by enforcement settlement penalties.[194] Violators can use up to 50% of their penalty to fund a project. The SEP program can fund many different types of projects like air monitoring, reducing pollution, community engagement and empowerment, environmental restoration, and environmental education. In Brawley, a community organization uses SEP funds to address environmental concerns through community empowerment, health surveys, reports, and monitoring. CARB staff regularly meet with community members and organizations to discuss potential SEPs and assist with the process. More information on SEPs can be obtained by emailing SEP@arb.ca.gov.

Other Areas of Mobile Source Enforcement

CARB has adopted regulations to reduce emissions from additional mobile sources, including various types of off-road equipment. These different programs help contribute to efforts to lower emissions statewide. Information on these additional programs can be found in the appendices.

No inspections have been conducted for these programs in North Imperial County. CARB will work on coordinating inspections for these additional programs as applicable in the community.

5.3 Enforcement Compliance Mechanisms

Compliance with District and state rules is essential in achieving the emission reduction and exposure reduction targets for the North End Phase 1 Community. The sections below identify approaches to enhance compliance reporting, outreach, and enforcement with consideration of the Community-Focused Enforcement Initiatives that are outlined in the CARB Blueprint 2.0.[195]

5.3.1 ICAPCD Enhanced Enforcement Measures

In order to improve compliance rates within the North End Phase 1 Community, the District is proposing certain enhanced enforcement measures with this Plan. These measures are intended to increase community engagement, leverage inter-agency relationships, facilitate the complaint process, and generally improve enforcement in the Community.

E-1. Cross-Agency Training

[194] CARB. Supplemental Environmental Projects (SEP). Available at: https://ww2.arb.ca.gov/our-work/programs/supplemental-environmental-projects-sep. Accessed: November 2024.

[195] CARB. 2023. Community Air Protection Program Blueprint 2.0. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-04/BP2.0_FULL_FINAL_ENG_2024_04_09.pdf. Accessed: October 2024.

The District is looking to establish regular communication with outside agencies in order to improve violation response time. To that end, to promote better enforcement of regulations, the District is proposing to perform cross-training of other local agencies on District rules so that they can readily identify specific types of violations. Examples of cross-training include working with the Imperial County Sheriff's Department and city representatives to learn about the dust impacts of illegal trespassing and collaborating with the fire department on properly identifying illegal burning activity. Within one year from CARB approval of this Plan, the District is proposing to conduct at least one training session for local agencies. If interest and attendance is favorable, training sessions could continue to be scheduled yearly through 2030.

E-2. Increased Community Outreach – Workshops and Trainings

The District is looking to increase community outreach through workshops and trainings for both members of industry and the public. In the July 15, 2024 CSC survey, 100% of CSC members and approximately 67% of public attendees who participated identified workshops and trainings as a "High Priority" strategy. Under this measure, the District is proposing to provide annual training at industry and public workshops on enforcement-related issues, as well as how to access and interpret air quality data such as data from monitors. Within one year from CARB approval of this Plan, the District is proposing to conduct at least one training session for local industry and one workshop for the public. If interest and attendance is favorable, these training sessions and workshops could continue to be scheduled yearly through 2030.

E-3. Increased Community Outreach – Publications

The District aims to enhance community engagement by launching a quarterly newsletter to disseminate enforcement statistics and rule updates to local agencies, facilities, and residents within six months of CARB approval of this Plan. Additionally, the District will undertake annual reviews of enforcement data through these newsletters to pinpoint improvement opportunities, shaping future enforcement and educational initiatives. Although newsletters will go out quarterly, annual findings will be publicly shared through the newsletter by April 1 of the following year, aligning with the District's commitment to transparency and informed community involvement.

E-4. Formation of a Dedicated Outreach Team

Conducting community-level outreach is key to understanding the Community's enforcement-related concerns, including identification of potential violations or unpermitted sources. Under this measure, the District and CARB are proposing to form a dedicated enforcement outreach team made up of staff from the agencies to actively engage with the Steering Committee and respond to community concerns. The District aims to bolster community engagement by forming an outreach team within six months following CARB's approval of this Plan. This team will be tasked with maintaining an ongoing dialogue with the Steering Committee, ensuring sustained interaction for the duration of its activity.

E-5. Inspection of Construction Sites for Projects Lasting Longer than 30 Days

Inspections of permitted facilities are a crucial part of the District's strategy for maintaining air quality standards. To promote compliance with regulations by construction sites, the District proposes to conduct at least one on-site inspection for construction projects lasting longer than 30 days that have an established dust mitigation plan. These inspections will ensure the site is in compliance with relevant regulations. If any problems are identified, the District will perform a follow-up inspection to ensure issues are resolved. This systematic approach not only enforces compliance but also aims to minimize particulate matter (PM) emissions, reflecting the District's commitment to upholding strict air quality standards in construction practices. Information from these inspections will be shared as part of the quarterly newsletters and other public facing documents.

E-6. Communicate Strategic Updates to ICAPCD Policy 15, *Burning of Residential Green Waste*

ICAPCD Policy 15, *Burning of Residential Green Waste,* was most recently updated on May 10th, 2023. The overall goal of this policy is to reduce the emissions of toxic air pollutants produced from burning residential green waste, protecting community health and the environment from harmful smoke pollution. Since January 1, 2004, Policy 15 has stated that household waste cannot be burned at residences. Only dried green waste is permitted to be burned subject to certain conditions listed below:

- Burning residential green waste is prohibited within city limits and designated townships. Only vegetation grown on a person's property can be burned on that property.
- Use of burn barrels or backyard incinerators is not allowed. All burning must be done on property ground and ignited using an approved ignition device.
- Burn piles cannot exceed ten by ten feet wide and five feet high.
- Burning is only permitted on permissive burn days as determined by the ICAPCD.
- Residents must contact ICAPCD for approval and conduct burning within allowable hours, with all burns to be completed by sunset each day.

The District proposes to communicate key updates and aspects of Policy 15 during training sessions and workshops, ensuring direct engagement with community members. Furthermore, the distribution of flyers through social media platforms will communicate these updates to a wide audience quickly. This approach helps vital information to be accessible to members of the community, thereby promoting transparency and inclusivity.

5.3.2 CARB Enhanced Enforcement Measures

CARB Enforcement has dedicated resources to build relationships with communities statewide to address environmental concerns community members have listed. To continue efforts in the fight for environmental justice, CARB plans to continue collaborating with community members by providing expertise and labor as a tool to identify strategies to assist with the environmental problems community members face. CARB aims to develop action plans collaboratively, focusing on the community needs and priorities to provide enforcement actions in North Imperial. On the next page are some suggested strategies for the community to consider.

Table 5.5. CARB Enhanced Enforcement Measures

Strategy	Action	Enforcement Program Element
CARB Strategy 1: SEPs	CARB staff will also work with CSCs to learn of environmental issues the community is facing and assist with the development of SEPs. CARB investigators will advocate for SEP funding by encouraging violators to fund SEPs.	Community Outreach; Funding and Incentives
CARB Strategy 2: HD I/M	CARB will work with the CSC and ICAPCD to review enforcement data and determine how to conduct more heavy-duty activities on mobile sources like vehicles, TRUs, off-road, etc.	Mobile Sources Inspections
CARB Strategy 3: Community Outreach and Education	CARB will work with the CSC and local agencies to provide material to the community like complaint information, factsheets, and funding opportunities.	Community Outreach; Funding and Incentives

6. Required Metrics

According to the CAPP Blueprint 2.0, a community emissions reduction program must include specific metrics that can be used to track progress in the selected community. These metrics are critical in helping a community understand whether their emissions reduction program is achieving its intended objectives.

The Blueprint specifies certain metrics as required. Specifically, a community emissions reduction program must identify and describe how progress on achieving emission reductions for specific categories of sources will be tracked on an annual basis. It must also track emissions for any pollutant that has an identified emissions reduction target. Sections 6.1 and 6.2 present the relevant metrics for the strategies proposed in this Plan.

6.1 ICAPCD Metrics

Table 6.1 presents the annual implementation metrics associated with the ICAPCD-led strategies described in Section 4 of this Plan. The status of these and the District's air quality and exposure metrics (see Section 6.1.1) will be reported on in the District's annual progress report, which will be made available to the public no later than October 1st of every year following program implementation.

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency
M-1 (Fund Paving Projects)	• The number and date of meetings held with local public works departments and/or other representatives from the North End Phase 1 Community to discuss potential locations and implementation of paving projects • The amount of AB 617 funding used towards paving projects	ICAPCD
M-2 (Fund Community Greening Projects)	• The number and type of community greening projects implemented • The amount of AB 617 funding used towards greening projects	ICAPCD
M-3 (Air Filtration System)	• A description of each air filtration system installed in the North End Phase 1 Community, including the location, technology deployed, number of square feet conditioned, and number of sensitive receptors affected • The amount of AB 617 funding used towards these projects	ICAPCD
M-4 (Install Standalone Filters in Households)	• The number of air filters installed in the North End Phase 1 Community • The amount of AB 617 funding used towards these projects	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency
M-5 (Residential Duct Cleaning)	• The number of households that have participated in the air duct cleaning program • The amount of AB 617 funding used towards these projects	ICAPCD
M-6 (School Flag Program/Marquee)	• The number of schools participating in the program • The amount of AB 617 funding used towards these projects	ICAPCD
M-7 (Reducing Dust Emissions from Residential Yards)	• The amount of gravel distributed or the number of households that have participated in the program • The amount of AB 617 funding used towards these projects	ICAPCD
T-1 (School Bus Replacement and Infrastructure)	• The number of chargers or hydrogen fueling stations installed • The number of buses co-funded through this strategy • The amount of AB 617 funding used towards these projects	ICAPCD
T-2 (Promote Public Transportation)	• The number of meetings with public transportation operators attended by the District and/or CSC members	ICAPCD & CSC
T-3 (Truck Idling Education and Outreach)	• The date, topic, and number of attendees for each public workshop for local businesses that have heavy-duty truck fleets operating in the Community	ICAPCD & CARB
O-1 (Air Justice at Schools)	• The number of schools hosting Air Justice per year and the number of Air Justice programs hosted by a school per year	ICAPCD
O-2 (Project ACE)	• The number of schools where Project ACE is implemented	ICAPCD
O-3 (Alternative to Agricultural Burning)	• The number of workshops held to inform local farmers of existing programs to reduce agricultural open burning.	ICAPCD
O-4 (Pesticides)	• The number of meetings with the Department of Pesticide Regulation (DPR) and other relevant agencies attended by the District and/or CSC members	ICAPCD & DPR
R-1 (Identify Strategies to Mitigate Impacts from Agricultural Activities on Windy Days)	• Descriptions of the policies, procedures, and outreach initiatives that were evaluated and the date(s) of the CSC meeting(s) at which they were discussed	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency
R-2 (CARB/State Strategies)	• See **Section 3.4.2**	CARB & ICAPCD
E-1 (Cross-Agency Training)	• For each cross-agency training session provided, the date, topic, and number of attendees, as well as a summary of any action items, concerns, or solutions discussed.	ICAPCD
E-2 (Workshops and Training)	• For each industry training session and public workshop provided, the date, topic, and number of attendees, as well as a summary of any action items, concern, or solutions discussed.	ICAPCD
E-3 (Quarterly Newsletter)	• The publication date for each quarterly newsletter and a summary of any enforcement- or rule-related discussion topics.	ICAPCD
E-4 (Dedicated Outreach Team)	• The date the outreach team was assembled and the current list of members. • The number of presentations or meetings with the Steering Committee. • A description of community concerns and associated responses/solutions.	ICAPCD & CARB
E-5 (Construction Site Inspections)	• The date the annual or quarterly review of compliance and enforcement is released to the public. • The number of construction site inspections conducted, including type, date, and location. • The number of construction-specific NOVs and NTCs issues, including the date and regulation cited. • The number of complaints received related to construction, including type and resolution. • The number of construction-related NOVs and NTCs resolved. • A construction specific non-compliance rate for the year.	ICAPCD
E-6 (Communicate Strategic Updates to ICAPCD Policy 15)	• For communications in the form of a newsletter or publication, the date of each publication and a summary of the key information communicated. • For each workshop or training session help to communicate strategic updates, the date, key topics, and number of attendees, a summary of any action items,	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics		
Strategy	**Metric Description**	**Responsible Agency**
	concerns, or other key discussion topics, and a description of the outreach conducted	

Air Quality and Exposure Metrics

As described in the Community Air Monitoring Plan for the North End Phase 1 Community, the District's community monitors will be used to track trends in the progress of emission reduction projects. Particulate matter data from the 15 AB 617 Community Monitors will be evaluated periodically. Because the implementation of strategies will occur over a five-year period, it may take several years to see reductions in exposure that can be measured at the community scale. Therefore, the results of this analysis at the five-year milestone will be crucial to understanding air quality improvements within the Community.

7. California Environmental Quality Act Analysis

According to Section 15061 (b)(3) of the California Environmental Quality Act (CEQA) Guidelines, a project is exempt from CEQA if, "the activity is covered by the common-sense rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."[196] Since this Plan or "proposed Project" will result in an air quality benefit to the Community, this proposed Project is not expected to result in a significant impact under CEQA.

CEQA Guidelines §15308 provides a categorical exemption for "actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment."[197] This proposed Project is an action taken by a regulatory agency, the ICAPCD, as authorized by state law for the protection and betterment of air quality in Imperial County. The ICAPCD determined that there is no substantial evidence indicating that any of the exceptions to the categorical exemptions apply to the proposed Project pursuant to CEQA Guidelines Section 15300.2 – Exemptions. Therefore, the proposed Project is exempt from CEQA.

Pursuant to Section 15062 of the CEQA Guidelines, the ICAPCD will file a Notice of Exemption upon Imperial County Air Pollution Control Board approval of the proposed Project.

[196] California Code of Regulations. Title 14, Section 15061: Review for Exemption. Available at: https://www.law.cornell.edu/regulations/california/14-CCR-15061. Accessed: November 2024.

[197] California Code of Regulations. Title 14, Section 15308: Actions by Regulatory Agencies for Protection of the Environment. Available at: https://www.law.cornell.edu/regulations/california/14-CCR-15308. Accessed: November 2024.

8. Conclusion and Checklist

8.1 Checklist of Community Emissions Reduction Program Criteria and Conclusions

Table 8.1 presents a checklist outlining the recommended elements for a community emission reduction program under CARB's CAPP. As documented in Table 8.1, this Community Emission Reduction Program sufficiently addresses all applicable criteria.

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
Health-Based Air Quality Actions	Provide a description of health-based objectives	Section 1.3.1
Community Steering Committee	Provide documentation on the community steering committee	Section 2.1; Appendix B
Outreach and Engagement	Provide documentation the air district board held a public board hearing when presenting the final program for air district board consideration.	Pending; the Plan has been tentatively scheduled to go before the ICAPCD Board in January 2025.
	Provide documentation the air district provided materials in appropriate languages and interpretation services were available at workshops and public board hearings in accordance with the steering committee charter.	Section 2.2; Appendix C
	Provide documentation of a dedicated public webpage for each community emissions reduction program.	Section 2.2
	Provide documentation that outreach materials were distributed broadly to a variety of groups through various avenues such as the internet, paper mailings, and local print, radio, and television media as appropriate at least five days in advance of each meeting	Section 2.2; Appendix C
	Provide a summary of the results of the first year of public outreach and an overview of the planned approach for public engagement moving forward.	Section 2.2; Appendix C
Community Profile	Provide a description of the community and include a discussion of community issues, including final geographic boundary, types of pollution impacting the community, a characterization of current public health data, and socioeconomic factors.	Section 3.1

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
Technical Foundation	Provide an assessment and description of the existing high cumulative air quality exposure burden within the community.	Section 3.2.1
	Provide an assessment of sensitive receptor locations within the community and how land use issues impact exposure.	Section 3.2.5
	Provide a community-level emissions inventory based on best available data and developed in accordance with CARB's community inventory guidance.	Section 3.2.2
	Provide an assessment of the benefits of existing air quality policies and programs in reducing emissions within the community.	Section 3.2.4
	Provide an assessment of compliance with air quality rules and regulations for sources within the community, consistent with the enforcement plan.	Section 5.2; Appendix F
	Provide the source attribution analysis that assesses the share of mobile, stationary, and area-wide source emissions contributing to the air quality burden in the community, based on at least one of the source attribution approaches discussed in the online Resource Center.	Section 3.2.3
	Provide supporting documentation on methodologies and data sources used in the technical assessment.	Section 3
Emission Reduction Targets	Specify emissions reduction targets to be achieved within five years for directly-emitted applicable toxic air contaminants, $PM_{2.5}$, and any other identified pollutants (e.g., lead, PM_{10}) as defined in the technical assessment, designed to maximize toxic air contaminant emissions reductions and achieve healthful levels of $PM_{2.5}$.	Section 4.1

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
	For the mobile, stationary, and area-wide sources of applicable criteria air pollutants and toxic air contaminants impacting the community, specify: • Commitments to achieve numerical goals for compliance with air quality rules and regulations. • Commitments to achieve numerical goals for deploying or implementing available technologies or control techniques, with a focus on zero emission technologies where feasible	Sections 4.1 and 4.2
Exposure Reduction Targets	Specify proximity-based goals to reduce exposure at sensitive receptors.	Section 4.3
Reduction Actions and Implementation Schedule	Establish reduction strategies, including: • Regulatory Strategies • Facility Risk Reduction Audits • Air Quality Permitting Strategies • Enforcement Strategies • Incentives-Based Strategies • Engagement Approaches • Land Use Strategies • Transportation Strategies • Mitigation Strategies	Section 4.4
	For each new strategy, specify a description of the strategy, the expected emissions and/or exposure reductions, cost effectiveness, timeline for implementation, a description of how the technical assessment informed strategy development, and perspectives of the community steering committee.	Section 4.4; Section 5.3.1; Appendix G
Enforcement Plan Requirements	Document a three-year enforcement history.	Section 5.2; Appendix F
	Specify compliance mechanisms that will be implemented.	Section 5.3.1
Required Metrics	Specify required annual metrics to track progress.	Section 6
CEQA Environmental Quality Act (CEQA) Analysis	Include any applicable CEQA analysis	Section 7

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APPENDIX A
COMMUNITY STEERING COMMITTEE MEETING SUMMARY

Appendix A. Community Meeting Summary
Imperial County Year 5 Community Emissions Reduction Program Plan
North End Phase 1 Community

Meeting Date	Meeting Time	Meeting Location	Meeting Type	Number of Active Attendees	Outreach Mechanisms	Topics Discussed[1]	Next Steps
7/26/2023	5:30-7:30pm	Brawley, California	Steering Committee Meeting (#1)	22	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- General AB 617 Program Overview - Community Air Grant Program - AB 617 Steering Committee Roles - Community Implementation Grant, funds distribution, and funds allocation - Status of the CSC (not yet formed) - Several applicants' introductions - Charter indicates the location of the meetings, and it will rotate between Brawley, Calipatria, and Westmorland	- Plan on the date for the next meeting - Subscription list on the website for committee meetings - Further development of CSC
8/14/2023	5:30-7:30pm	Westmorland, California	Steering Committee Meeting (#2)	15	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CSC creation issues due to the rules in the Charter - AB 617 Public Meeting Code of Conduct - AB 617 CSC Charter - Development, implementation, and tracking metrics of the CERP and CAMP - Community-based projects and corresponding metrics - Implementation and incentives funding for community-based projects were approved - Clarification on Charter Sections - Possibility to create committee by next meeting - Discussion and voting on the number of members to serve on the CSC - CARB Blueprint updates and release for public comments in October 2023	- Steering committee formation - Briefing on Brown Act - Moving forward with Charter - Discussion with CARB for a presentation to launch the CERP
9/18/2023	5:30-7:30pm	Calipatria, California	Steering Committee Meeting (#3)	12	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CSC applications still under review with an upcoming update in three to four weeks - CERP and CAMP timeline and how external (Ramboll) help is useful - Updates on the South End projects - Electrification of school buses and HVIP process for Brawley, discussion if North End could use South End projects as inspiration - CERP content on monitoring locations and enforcement policies - Discussion on monitors for PM_{10} & $PM_{2.5}$ monitoring and future toxic metal monitoring and AQview platform - Importance of information sharing between the three cities during the CSC meetings - ICAPCD Regulation 8 as a way to address dust concerns - Rule 310 Operational Development Fee	- Introduction of monitor locations and projects and strategies the South End is working on - Potential project ideas preparation for ICAPCD (sent to District via email)
10/16/2023	5:30-7:30pm	Brawley, California	Steering Committee Meeting (#4)	25	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Presentation of a roster of proposed CSC members, introductions from proposed members and ICAPCD personnel - Overview on AB 617 programs and regulated activities - Discussion on potential monitoring locations and the monitoring program - Discussion on equal funding distribution between the three cities - Discussion on agricultural burning - Discussion on feedlots as a potential emission/odor (certain VOCs) source and addressing it in the CERP and CAMP - Additional discussion on the monitoring program, things to consider, and how to use/access data	- State legislators meeting with North End Community - Discussion and identifications of potential emission sources in the Community
11/28/2023	5:30-7:30pm	Virtual meeting via Zoom with live interpreter	Steering Committee Meeting (#5, first meeting with an established CSC)	20	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Request for ICAPCD to introduce the CSC roster and the alternates for each member - Analysis of monitoring data in the Corridor of Brawley-Westmorland-Calipatria was presented - Discussion on natural and anthropogenic H_2S emissions and monitoring need by geothermal facilities and lithium facilities - Difference between regulatory monitors and air quality sensors - Discussion of the current county-level emissions inventory	- List of potential project creation and their discussion in CSC meetings

Appendix A. Community Meeting Summary
Imperial County Year 5 Community Emissions Reduction Program Plan
North End Phase 1 Community

Meeting Date	Meeting Time	Meeting Location	Meeting Type	Number of Active Attendees	Outreach Mechanisms	Topics Discussed[1]	Next Steps
1/22/2024	5:30-7:30pm	Westmorland, California	Steering Committee Meeting (#6)	21	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Motion to approve the CERP Extension Letter - CAMP Community Sensor Contractor discussion and Selection (includes monitor makes and models) - First sensor location discussion and selection, process for people to file anonymous suggestions on location - 2024 meeting calendar	- Discussion on SCS Engineering monitor type (specific sensor) - Additional discussion on three monitoring locations - Discussion on emissions from trucks and lithium and geothermal extractions (CAMP)
1/29/2024	5:30-7:30pm	Virtual meeting via Zoom	Steering Committee Meeting (#7)	21	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- AB 617 North End PM_{10} and $PM_{2.5}$ Community Sensors Discussion and Selection provided by SCS Engineering - Discussion on $PM_{1.0}$ as a potential community concern - Motion passed to purchase QuantAQ sensors - Discussion on first sensor location (CAMP) to be installed at a local residence - Additional discussion on things to consider related to sensor location (ex. sensitive receptors, avoiding grouping)	- Sensitive locations and sources - Wind anemometer and $PM_{1.0}$ presentations - Current sensor locations and most contaminant locations list
2/26/2024	5:30-7:30pm	Calipatria, California	Steering Committee Meeting (#8)	17	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- A reminder that AB 617 is focused on the community and how the community can create strategies to reduce emissions - Presentation of Technical Foundation for CERP Development and discussion - Community Air Protection Incentives - Boundary updates, and best practices for defining a boundary	- Other locations for monitor selection - Boundary selection - Discussion on four purchased sensors
3/18/2024	5:30-7:30pm	Tour around Brawley, Westmorland and Calipatria	Tour	--	--	- Community boundaries investigation - Brawley Emission Sources (8) - Calipatria Emission Sources (7) - Westmorland Emission Sources (6)	--
4/8/2024	5:30-7:30pm	Virtual meeting via Zoom	Steering Committee Meeting (#9)	21	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Tour debrief and discussion of Hernandez Park (Calipatria) being an area of concern - Presentation and discussion on Community Phase 1 Boundaries and Selection - Deliberation over the proposed boundary details for Westmorland, Calipatria, and Brawley - Motion passed to approve the boundaries that are now used in the CAMP and CERP	- Potential monitoring locations - CARB methodology and existing regulations for any sources will be added to future topics
4/15/2024	5:30-7:30pm	Virtual meeting via Zoom	Steering Committee Meeting (#10)	19	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Potential creation of a mission statement (not originally included in the Charter) - CAMP - PM Sensor Location Finalization Discussion and Selection - The monitoring locations were not approved and there was a push to reopen the survey where suggested locations could be submitted	- Further discussion on monitoring locations
5/20/2024	5:30-7:30pm	Westmorland, California	Steering Committee Meeting (#11)	15	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Presentation of AB 617 North End Phase 1 Community Input Survey Results - CAMP - PM Sensor Location Finalization Discussion and Selection - Approval of the first nine monitoring locations - Discussion of timeline related to budget and RFPs	- Five monitoring locations' decision and approval - Geothermal plant monitoring data
6/17/2024	5:30-7:30pm	Brawley, California	Steering Committee Meeting (#12)	13	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Continued discussion on monitor locations and selection - CAMP: discussion and questions on the draft data report - CAP Guidelines and CERP Strategy Sample discussions: a few specific incentives mentioned involved agricultural burning - A decision was made to conduct a survey about CERP strategies at the July meeting - At the open discussion, a question was asked about how fires affect regulatory monitors. Clarification was provided that monitors will capture fires.	- Survey on which CERP strategies would be preferred by the Community - Monitoring locations and CAMP - Potential topics of interest including geothermal, feedlots, vehicles, and agricultural burning

Appendix A. Community Meeting Summary
Imperial County Year 5 Community Emissions Reduction Program Plan
North End Phase 1 Community

Meeting Date	Meeting Time	Meeting Location	Meeting Type	Number of Active Attendees	Outreach Mechanisms	Topics Discussed[1]	Next Steps
7/15/2024	5:30-7:30pm	Brawley, California	Steering Committee Meeting (#13)	17	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Continued discussion on PM sensor location and selection - Presentation on Strategy Selection for CERP - Discussion on strategies and their implementation - Survey to determine which strategies are most important to the CSC	- Continuation of the survey on CERP strategies - Potential presentations on emissions data from fireworks, the Carl Moyer Program, and a presentation from Ramboll - CARB also to present at the meeting next month
8/19/2024	5:30-7:30pm	Virtual meeting via Zoom	Steering Committee Meeting (#14)	15	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Continued discussion on sensor selection, one open location in Brawley - Discussion of CERP strategies survey results and additional strategies. Those that garnered positive feedback include: paving projects, EV school buses, charging infrastructure, household filters, outreach, agricultural burning, and public transit - CARB mentioned that they would follow up with incentives team	- Continued discussion of strategies - Continued discussion on monitor locations
9/23/2024	5:30-7:30pm	Westmorland, California	Steering Committee Meeting (#15)	19	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Public comment about a generator to be installed in the community and ensuring that people would be able to comment on the proposed project - Discussion of CERP strategies and funding for the strategies -Discussion of technical elements related to the CAMP including notifications to altert the community	-Presentation of CERP timeline, pending action items, and deadlines

Notes:

[1] Meeting materials, including presentations, are available at: https://www.icab617community.org/brawley-westmorland-calipatria. Accessed: October 2024.

Abbreviations:

AB - assembly bill
CAMP - Community Air Monitoring Plan
CAP - Community Air Protection
CARB - California Air Resources Board
CERP - Community Emissions Reduction Program
CSC - Community Steering Committee
EV - electric vehicle
H_2S - hydrogen sulfide
HVIP - Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project
ICAPCD - Imperial County Air Pollution Control District
$PM_{1.0}$ - extremely fine particulates with a diameter smaller than one micron
PM_{10} - Respirable Particulate Matter
$PM_{2.5}$ - Fine Particulate Matter
RFP - Request for Proposal
VOC - volatile organic compound

APPENDIX B
AB617 COMMUNITY STEERING COMMITTEE CHARTER

AB 617 Imperial North-End Community Steering Committee Charter

ARTICLE I. AUTHORITY.

This Charter is adopted by Board of the Imperial County Air Pollution Control District, (Imperial County Board of Supervisors (BOS) convenes as "District Board") hereinafter referred to as "District Board," for the AB 617 Imperial North-End Community Steering Committee, hereinafter referred to as the "Committee," to establish rules, policies, and procedures for its proceedings. In coordination with the Imperial County Air Pollution Control District, hereinafter referred to as "District," the Committee was established by the District Board pursuant to Resolution No. _____, under the statutory authority of California Assembly Bill 617, hereinafter referred to as "AB 617." AB 617 is designed to implement a strategy to reduce emissions of toxic air contaminants and criteria pollutants in environmental justice communities affected by a high cumulative exposure burden, and provide education to these communities to increase awareness on air quality matters, which will lead to positive behavioral change that improves air quality.

The District is the responsible agency for administering AB 617 activities, including but not limited to the implementation of the Community Emissions Reduction Program and Community Air Monitoring Plan, hereinafter referred to as "Program(s)." As such, final decision-making authority regarding AB 617 activities shall reside with the District's Air Pollution Control Officer and/or the District Board, as required by law.

ARTICLE II. PURPOSE.

The purpose of the Committee is to support active community involvement and collaboration in the development of the Program(s) by providing a forum for identifying community issues and potential solutions with all relevant parties. The Committee is to also support the development of a Community Emissions Reduction Program and Community Air Monitoring Plan, to help establish new Program(s) and/or expand upon any existing Program(s).

The Committee shall be responsible for discussing and providing recommendations to the District Board regarding the development and implementation of the Program(s), including but not limited to:

1. Determination of the final boundaries of the community to be served under the Program(s);

2. Community profile and technical assessment;

3. Approaches for community engagement and outreach;

4. Mechanisms for engaging with other agencies;

5. Issues and sources contributing to the community's air pollution challenges;

6. Responsibility/authority of government agencies, non-profit entities, and other community members to address air pollution challenges;

7. Strategies for developing/implementing the Program(s);

8. Program(s) targets and strategies;

9. Program(s) Enforcement; and

10. Metrics to track Program(s) progress.

ARTICLE III. COMMITTEE MEMBERS.

3.1. Number and Appointment. The Committee shall consist of nine (9) voting members appointed by the District Board. The nine (9) members shall be appointed in accordance with the appointment and application process discussed below.

3.2. Qualifications. Each member of the Committee shall either reside, work, or own businesses within the Imperial North-End community (Brawley-Westmorland-Calipatria), as defined by the Community Air Protection (CAP) Program(s) and CAP Blueprint. Additionally, each member shall meet the qualifications of his or her position as set forth in Section 3.3 below.

3.3. Composition. The nine (9) voting members shall include:

1. Three (3) members from the city of Brawley, including individuals, community-based organizations, affected sources and local government bodies.

2. Three (3) members from the city of Westmorland, including individuals, community-based organizations, affected sources and local government bodies.

3. Three (3) members from the city of Calipatria, including individuals, community-based organizations, affected sources and local government bodies.

3.4. Alternates. Each Committee member specified in Section 3.3 may designate one (1) alternate from the pool of submitted applications, subject to approval by the District Board.

3.5. Committee Appointment and Application Process. The District Board shall appoint Committee members in the following manner:

1. Committee members shall be appointed in compliance with a standardized application process including but not limited to submitting an application form to

the District including information (as necessary) to demonstrate the applicant's interest in the community corridor pursuant to AB 617.

2. Applications for the appointment of Committee members shall be assembled by the Clerk of the Committee.

3. Persons applying in accordance with the above-mentioned process shall be recommended by District staff and appointed by a majority of the District Board in accordance with all applicable laws. Committee members serve at the pleasure of the District Board, and may be removed from office by a majority vote of the District Board.

3.6. Term of Appointment. Committee members shall be appointed for a term of two (2) years. Once the initial term is fulfilled, the Committee members shall make a succeeding application for a full two (2) year term in accordance with the above-mentioned application process. At the conclusion of any term, a Committee member may be reappointed by the District Board to a subsequent two (2) year term.

3.7. Resignation. A Committee member may resign effective on giving written notice to the Clerk of the Committee and the District, unless the notice specifies a later date for his/her resignation to become effective. The Clerk of the Committee shall enter the notice in the proceedings of the Committee. The acceptance of a resignation shall not be necessary to make it effective.

3.8. Vacancies. Vacancies occurring on the Committee shall be automatically filled by the respective designated Alternate. In the case of the vacancy of an Alternate, the District Board shall appoint a replacement from the pool of submitted applications.

3.9. Attendance and Participation. Committee members are expected to attend all regular committee meetings. This includes in-person, teleconference and/or videoconference meetings. Please note that if both the primary and alternate members are in attendance at a meeting, only one member (either the primary or the alternate), may sit at the table during an in-person meeting, or be a panelist during a virtual meeting. A Committee member may be removed when the member has failed to attend three (3) consecutive meetings (without a leave of absence) or half the meetings in any twelve (12) month period. District staff and Committee members shall discuss the absences, the reason(s) for the absences, and the impact of the absences on the Committee prior to determining the removal of the committee member.

A Committee member may request a leave of absence. A request for a leave of absence shall be made in writing to the District's Air Pollution Control Officer (APCO) at any point during a Committee member's term for reasons of health, work, or other temporary circumstance. The decision to approve the leave of absence rests with the District's APCO. A leave of absence shall not exceed three (3) months.

3.10 Stipend. Each Committee member, with the exception of the Air Pollution Control Officer or his/her alternate, shall receive a stipend of seventy-five dollars ($75) per Committee meeting attended (excluding any subcommittee meetings, working group meeting and workshops), subject to the availability of AB 617 funding. A Committee member shall not be entitled to a stipend if he or she is more than thirty (30) minutes late to a Committee meeting, or leaves more than thirty (30) minutes early.

ARTICLE IV. MEETING PROCEDURES.

4.1. Facilitator.

A third-party professional and impartial facilitator will be employed to moderate and lead CSC meetings, Workshops, and Working Group meetings. The facilitator may assist the committee in reaching consensus on issues during the meetings. Additionally, the facilitator will help provide space for members to express their thought, including making extra efforts to encourage participation from less vocal members.

4.2. Regular and Special Meetings. The Committee shall establish the time and place for its regular meetings. The date, hour, and location of regular meetings shall be fixed by resolution of the Committee. The Committee shall hold at least one regular meeting each month of every calendar year. In the event of a lack of agenda topics, pending technical analysis, or any other reason; the Committee shall hold a vote to determine if the following scheduled monthly meeting is canceled. Special meetings and adjourned meetings may be held as required or permitted by law.

4.3. Notice. All meetings of the Committee, including, without limitation, regular, special and adjourned meetings, shall be called, noticed, held and conducted in accordance with the provisions of the Ralph M. Brown Act (commencing with Section 54950 of the California Government Code).

4.5. Quorum. A majority of current members of the Committee not on a leave of absence shall constitute a quorum. Vacant seats shall not count as "current members." Each member of the Committee, shall be entitled to one (1) vote. A vote of the majority of the members present with at least a quorum in attendance shall be required to take action, and/or make a recommendation, except for adjournment of a meeting which shall require only a majority of those present, and as provided in Section 4.9. No proxy or absentee voting shall be permitted.

4.6. Special Meeting. Notice of any special meeting shall be made in compliance with the Ralph M. Brown Act (commencing with Section 54950 of the California Government Code).

4.7. Conduct of Business.

1. Items on the agenda will be considered in order unless facilitator announces a change in the order of consideration.

2. Unless an agenda item identifies a particular source for a report, such as the Committee members, the Committee members and/or its advisors shall first report on the item. The item will then be open to public comment.

3. Confidential information shall not be subject to disclosure at meetings of the Committee.

4.8. Resolutions and Motions. All official acts of the Committee shall be taken either by resolution or a motion, duly made, seconded and adopted by a vote of the Committee members. Any Committee member, may make motions and seconds.

4.9. Voting. All actions of the Committee shall be adopted by an affirmative vote of a majority of the Committee members present and eligible to vote, provided that at least a quorum of Committee members are present and eligible to vote. Any act of the Committee shall be accomplished by a roll call vote when such a vote is requested by any member in attendance.

4.10. Motions to Reconsider. A motion to reconsider the vote on an agenda item may not be made at the meeting at which the item was acted upon. Such motions may be made at the subsequent Committee meeting, if the agenda item was not a hearing required by law, and the Committee member making the motion voted on the prevailing side of the agenda item sought to be reconsidered. If the item was a hearing required by law, a motion to reconsider may not be made.

4.11. Disqualification from Voting. A Committee member shall be disqualified from voting on any contract or any other matter in which he/she has a financial interest, as required by law.

4.12. Minutes. The Clerk of the Committee shall prepare the minutes of each meeting of the Committee. The minutes shall be an accurate summary of the Committee's consideration of each item on the agenda, and an accurate record of each action taken by the Committee. At a subsequent meeting, the Clerk shall submit the minutes to the Committee for approval by a majority vote of the Committee members in attendance at the meeting covered by the minutes. Once approved, the Clerk will sign the minutes and keep them with the proceedings of the Committee. The official Minutes, as approved by the Committee, recording any motions or actions taken by the Committee, shall be prepared and submitted to the Clerk of District Board.

4.13. Public Records. All records of the Committee shall be kept and provided to the public in accordance with the provisions of the California Public Records Act (commencing with Section 6250 of the California Government Code).

4.14. Adjournment. The Committee may adjourn any meeting to a time and place specified in the resolution or motion of adjournment, notwithstanding less than a quorum may be present and voting. If no members of the Committee are present at regular or adjourned

meeting, the Clerk may declare the meeting adjourned to a stated time and place and shall cause written notice to be given in the same manner as provided for special meetings, unless such notice is waived as provided in Section 4.3 of these Bylaws for special meetings. A copy of the order or notice of adjournment shall be posted as required by applicable law.

ARTICLE V. REPORTS AND COMMUNICATIONS.

5.1. Reports. On or before January 31st of each year, the Committee shall submit an annual report to the District Board. A draft of the report shall be provided to and approved by the Committee before its submission to the District Board. The report shall highlight the activities, accomplishments, and future goals of the Committee.

5.2. Progress Reports. The District Board may request the Committee to submit progress reports and recommendations at any time. The Committee shall respond to such requests within a reasonable period of time. Progress reports and recommendations shall be provided to and approved by the Committee before its submission to the District Board.

5.3. Communications with the Public. Public participation in Committee meetings shall be allowed as follows:

1. An opportunity for members of the public to directly address the Committee on any item on the agenda of interest to the public shall be provided before or during the Committee's consideration of the item.

2. The agenda will provide for public comment on items not on the agenda which are within the subject matter jurisdiction of the Committee at the beginning of each regular meeting agenda. The total time for public comment on matters not on the agenda shall not exceed fifteen (15) minutes, and each speaker is limited to a maximum of three (3) minutes.

3. The Committee may establish reasonable limits on the total amount of time allotted for public testimony on an item. When further discussion is required, the Committee may vote to allow time in the agenda of the following meeting.

5.4. Robert's Rules of Order. To the extent that conduct of the meetings is not governed by this Charter or the Ralph M. Brown Act, the current edition of Robert's Rules of Order shall apply.

ARTICLE VI. SUBCOMMITTEES.

6.1. Appointment. The Committee may decide that an ad-hoc advisory subcommittees ("Subcommittees") needs to be formed to conduct further research or data gathering on a specific issue. In this case, the Committee will determine the scope of the subcommittee and will ask for volunteers among the Committee members to be on the subcommittee. Such Subcommittees must be composed of less than a quorum of voting Committee

members. The Committee will conduct a vote to form a subcommittee, determine its scope of work, and define a timeframe for the subcommittee to report back to the Committee.

6.2. Authority. All Subcommittees are advisory only, and may be dissolved at any time upon a majority vote of the Committee.

6.3. Meetings. Meetings of Subcommittees shall be held at times and places determined by resolution of the Committee. A majority of those Committee members assigned to a Subcommittee shall constitute a quorum.

ARTICLE VII. ADVISORS.

7.1 Designation of Advisors. Advisors to the Committee shall include, but not be limited to:

1. Consultants. The Committee may request the services of consultants, advisors, and independent contractors as are deemed necessary and desirable in implementing and carrying out the purposes of the Committee. Such requests shall be granted at the discretion of the District Board and shall be subject to available funding.

2. General Counsel to the Commission. The Office of County Counsel of Imperial County shall serve as counsel to the Committee.

This Charter may be amended only by an approved motion or resolution of both of the Committee and the District Board after properly noticed meetings. This Charter shall be reviewed on at least an annual basis.

This Charter was approved by the Imperial County Air Pollution Control Board on October 17, 2023

APPENDIX C
COMMUNITY STEERING COMMITTEE MEETING MATERIALS (ELECTRONIC*)

* Materials are available for download at: http://www.icab617community.org/

APPENDIX D
LIST OF AB 2588 FACILITIES

Table D.1. AB 2588 Facilities Within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Permit No.	Facility Name	Source Type	Address	City	Priority Score
4728	Clinicas de Salud del Pueblo	Combustion	1166 K Street	Brawley	High
1506	Frye Chapel & Mortuary	Incinerator	799 Brawley Avenue	Brawley	Intermediate
4666	El Centro Motors	Paint Booth	811 S. Brawley Avenue	Brawley	Intermediate
2296	OWB Real Estate Holdings, LLC	Paint Booth	477 W. Aten Road	Brawley	Intermediate
4105	Radco, Inc.	Paint Booth	479 W. Aten Road	Brawley	Intermediate
4005	Western Mesquite Mines, Inc.	Mining	6502 East Hwy. 78	Brawley	Intermediate
2288	Brawley Auto Body	Paint Booth	1667 E. Main St	Brawley	Intermediate
2750	Calipatria State Prison	Paint Booth	7018 Blair Rd.	Calipatria	Intermediate
3525	Calipatria State Prison	Paint Booth	7019 Blair Rd.	Calipatria	Intermediate
3526	Calipatria State Prison	Paint Booth	7018 Blair Road	Calipatria	Intermediate
2454	U.S. Fish & Wildlife	Incinerator	906 W. Sinclair Rd.	Calipatria	Intermediate
4765	Calipatria Fuel, LLC	Service Station	500 N. Sorenson Ave	Calipatria	Intermediate
1697	Spreckels Sugar Company, LLC	Manufacturing	395 W. Keystone Rd.	Brawley	Intermediate
3089	OWB Packers, LLC	Manufacturing	57 E. Shank Road	Brawley	Intermediate
2410	Cardlock Fuels System, LLC	SS Cardlock	666 W. Aten Road	Westmorland	Intermediate
1524	7-Eleven, Inc.	Service Station	565 W. Aten Road	Brawley	Intermediate
4597	Citizens Imperial Solar, LLC	Combustion	1102 E. Simpson Road	Calipatria	Intermediate
2098	Gibson & Schaefer, Inc.	Concrete	304 E. Shank Road	Brawley	Intermediate
4568	Circle K Stores, Inc.	Service Station	591 W. Aten Road	Calipatria	Intermediate
2687	Spreckels Sugar Company, LLC	Non-Retail SS	395 W. Keystone Rd.	Brawley	Intermediate
4431	Superior Cattle Feeders, LLC	Non-Retail SS	551 S. Industrial Avenue	Calipatria	Intermediate
2169	Mann Company	SS Cardlock	671 W. Aten Road	Brawley	Intermediate
4560	Pilot Travel Centers, LLC. #1132-01	Service Station	632 W. Aten Road	Brawley	Intermediate
2494	Double Eagle Scale & Fuel, Inc.	SS Cardlock	668 W. Aten Road	Calipatria	Low
3585	The Elmore Company	Non-Retail SS	3104 W. Hwy. 86	Westmorland	Low
522	Axis-MSO, LLC	Service Station	582 W. Aten Road	Brawley	Low
4126	Petromart Retail Group, Inc. dba Brawley Fuel and Food #2	Service Station	627 W. Aten Road	Brawley	Low
4126	Petromart Retail Group, Inc. dba Brawley Fuel and Food #2	Service Station	628 W. Aten Road	Brawley	Low
2026	Gibson & Schaefer, Inc.	Concrete	304 E. Shank Road	Brawley	Low
423	Petromart Retail Group, Inc. dba Brawley Fuel and Food	Service Station	626 W. Aten Road	Brawley	Low
2610	Raynash, Inc. dba Fillco 1	Service Station	638 W. Aten Road	Brawley	Low
4721	Calipatria Queen Market, Inc. dba Calipatria Queen Market	Service Station	589 W. Aten Road	Calipatria	Low
4150	RNPM Inc.	Service Station	640 W. Aten Road	Brawley	Low

Table D.1. AB 2588 Facilities Within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Permit No.	Facility Name	Source Type	Address	City	Priority Score
438	Prime Fuel & Mini Mart	Service Station	633 W. Aten Road	Brawley	Low
364	MF. Esho, Inc.	Service Station	618 W. Aten Road	Brawley	Low
1363	Circle K Stores, Inc. #2701391	Service Station	592 W. Aten Road	Westmorland	Low
2573	Matthew D Venture Inc	Service Station	614 W. Aten Road	Westmorland	Low
4434	Rockwood Ag Services, Inc.	Combustion	47 Rutherford Rd.	Brawley	Low
3138	El Sol Market	Service Station	601 W. Aten Road	Westmorland	Low
3097	Superior Cattle Feeders, LLC	Combustion	551 S. Industrial Ave.	Calipatria	Low
4674	ES Engineering Services, LLC	Soil Remediation	658 W. Aten Road	Brawley	Low
4521	Moller Investment Group, Inc.	Soil Remediation	662 W. Aten Road	Brawley	Low
4522	Moller Investment Group, Inc.	Soil Remediation	663 W. Aten Road	Brawley	Low
4761	Jaco Oil Company	Soil Remediation	661 W. Aten Road	Calipatria	Low
4574	Love's of California	Service Station	613 W. Aten Road	Westmorland	Low
4156	Geosyntec Consultants	Soil Remediation	660 W. Aten Road	Brawley	Low
2544	Glamis Beach Store	Service Station	603 W. Aten Road	Brawley	Low
2544	Glamis Beach Store	Service Station	604 W. Aten Road	Brawley	Low
4006	Western Mesquite Mines, Inc.	Combustion	6502 East Highway 78	Brawley	Low
2657	CalEnergy Operating Corporation	Non-Retail SS	480 W. Sinclair Rd	Calipatria	Low
4658	Fondomonte California, LLC	Non-Retail SS	6546 Blair Road	Calipatria	Low
2513	Imperial Irrigation District	Non-Retail SS	5364 Hovely Rd.	Brawley	Low
4641	Kiewit	Non-Retail SS	6140 Poe Rd.	Brawley	Low
2131	Calipatria State Prison	Non-Retail SS	7018 Blair Road	Calipatria	Low
3829	LA County Sanitation	Non-Retail SS	6330 E. Highway 78	Brawley	Low
2911	U.S. Fish & Wildlife	Non-Retail SS	906 West Sinclair Rd	Calipatria	Low
3048	Spreckels Sugar Company, LLC	Sandblasting	557 W. Aten Road	Brawley	Low
642	Pioneers Memorial Healthcare District	Combustion	207 W. Legion Road	Brawley	Low
4445	CalEnergy Operating Corporation	Combustion	Various- CalEnergy	Calipatria	Low
3967	Glamis Beach Store	Combustion	5775 E. Hwy. 78	Brawley	Low
4233	Hudson Ranch Power I, LLC	Combustion	409 W. McDonald Road	Calipatria	Low
4260	Grimmway Enterprises, Inc.	Combustion	2171 W. Bannister Rd.	Westmorland	Low
4261	Grimmway Enterprises, Inc.	Combustion	2171 W. Bannister Rd.	Westmorland	Low
4443	Fondomonte California, LLC	Hay Compressing	6546 Blair Road	Calipatria	Low
2537	City of Brawley	Combustion	1515 Jones Street	Brawley	Low
2536	City of Brawley	Combustion	760 Willard Avenue	Brawley	Low

Table D.1. AB 2588 Facilities Within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Permit No.	Facility Name	Source Type	Address	City	Priority Score
2139	Calipatria State Prison	Combustion	7018 Blair Road	Calipatria	Low
4405	Wm. Bolthouse Farms, Inc.	Combustion	5337 Lack Rd.	Westmorland	Low
4404	United Hay Press, Inc	Hay Compressing	1853 W. Frontage Road A	Brawley	Low
4410	CalEnergy Operating Corporation	Combustion	Various- CalEnergy Facilities	Calipatria	Low
4622	CalEnergy Operating Corporation	Combustion	786 W. Sinclair Road	Calipatria	Low
2996	Calipatria State Prison	Combustion	7018 Blair Road	Calipatria	Low
4578	Western Mesquite Mines, Inc.	Combustion	6502 E. Hwy. 78	Brawley	Low
2874	Golden State Water Company	Combustion	621 S. Soresen Avenue	Calipatria	Low
2529	City of Brawley	Combustion	5015 Best Road	Brawley	Low
4132	AT&T Mobility	Combustion	3104 W. Hwy. 86	Brawley	Low
4428	CalEnergy Operating Corporation	Combustion	CalEnergy Facilities	Calipatria	Low
4429	CalEnergy Operating Corporation	Combustion	CalEnergy Facilities	Calipatria	Low
4430	CalEnergy Operating Corporation	Combustion	Various- Leathers Facilities	Calipatria	Low
4600	Love's of California	Combustion	551 W. Main Street	Westmorland	Low
2988	Qwest Communications Corp.	Combustion	526 East D Street	Brawley	Low
2593	Imperial Irrigation District	Combustion	904 N. Dogwood Rd.	Brawley	Low
4380	City of Brawley	Combustion	S. 9th Street	Brawley	Low
4367	New Cingular Wireless PCS, LLC dba AT&T Mobility	Combustion	1001 D E. Highway 78	Brawley	Low
3695	City of Brawley	Combustion	Legion Rd. & Dogwood Rd.	Brawley	Low
3280	Brawley Fire Department	Combustion	815 Main Street	Brawley	Low
2526	City of Westmorland	Combustion	5305 Martin Rd.	Westmorland	Low
4181	American Towers, LLC (89298 - Brawley CA)	Combustion	1 Mile West of Brawley	Brawley	Low
4135	AT&T Corporation	Combustion	4415 Green Rd.	Brawley	Low
3805	LA County Sanitation	Combustion	6502 E. Highway 78	Brawley	Low
4533	Fondomonte California, LLC	Combustion	6546 Blair Road	Calipatria	Low
4121	American Tower Management, LLC (41608 Westmore T2)	Combustion	1621 W. Baughman Rd.	Brawley	Low
4339	Zayo Group, LLC	Combustion	101 S. Industrial Ave.	Calipatria	Low
3609	Imperial Valley Emergency Communications Authority (IVECA)	Combustion	1698 I Street	Brawley	Low
4371	New Cingular Wireless PCS, LLC dba AT&T Mobility	Combustion	4560 Green Road	Brawley	Low
3812	AT&T Corporation	Combustion	130 South Imperial Ave.	Calipatria	Low
4724	SBA Communications	Combustion	5384 E. Highway 78	Brawley	Low
2130	Calipatria State Prison	Combustion	7018 Blair Road	Calipatria	Low
4774	T-Mobile	Combustion	215 E Street	Brawley	Low

Table D.1. AB 2588 Facilities Within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Permit No.	Facility Name	Source Type	Address	City	Priority Score
3878	Pioneers Memorial Hospital	Combustion	205 W. Legion Rd.	Brawley	Low
4305	American Tower, L.P. (40741 - South Salt)	Combustion	4300 W. Hwy. 86	Brawley	Low
4375	Viridos	Combustion	250 W. Schrimpf Rd.	Calipatria	Low
2998	Calipatria State Prison	Combustion	7018 Blair Road	Calipatria	Low
4759	SDSU Brawley STEM Building	Combustion	560 State Route 78	Brawley	Low
4455	ORNI 18, LLC - Ormat Nevada, Inc.	Geothermal	4780 Dogwood Road	Brawley	Low
4003	City of Calipatria	Combustion	Various Locations	Calipatria	Low
4274	Calipatria State Prison	Combustion	7018 Blair Road	Calipatria	Low
4198	City of Brawley	Combustion	1505 Jones Street	Brawley	Low
4700	Orni 18, LLC - North Brawley Geothermal	Combustion	4982 Hovley Rd.	Brawley	Low
4726	Gateway Recycling	Combustion	3550 Dogwood Road	Brawley	Low
3300	Imperial Irrigation District	Combustion	Brawley Microwave Site	Brawley	Low
3610	Imperial Valley Emergency Communications Authority (IVECA)	Combustion	4560 Green Road	Brawley	Low
3731	Orni 18, LLC - Ormat Nevada, Inc.	Geothermal	4982 Hovley Road	Brawley	Low
3490	Imperial Irrigation District	Combustion	Midway Substation	Calipatria	Low
3141	Pacific Bell c/o Enviro Management	Combustion	301 E Street	Brawley	Low
4520	CalEnergy Operating Corporation	Combustion	CalEnergy Operating Corporati	Calipatria	Low
3814	City of Brawley Police Dept.	Combustion	351 Main Street	Brawley	Low
3296	Time Warner Cable	Combustion	215 E Street	Brawley	Low
2866	Imperial Irrigation District	Combustion	5364 Hovley Rd.	Westmorland	Low
3098	City of Westmorland	Combustion	200 West 1st St.	Westmorland	Low

Notes:

1. The table above is a summary of the data provided by ICAPCD detailing facilities in the North End Phase 1 Community that are subject to AB 2588

APPENDIX E
SENSITIVE RECEPTORS
SUPPORTING INFORMATION

Table E. Sensitive Receptors in the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Receptor Type	Receptor Name	City
Childcare	Sacred Heart School	Brawley
Childcare	P.M.H. Little People Center	Brawley
Childcare	Enrichment Center, The	Brawley
Childcare	Brawley Union High School Preschool	Brawley
Childcare	Icoe - Cds Room To Grow Preschool	Brawley
Childcare	United Families Inc.	Brawley
Childcare	Rcoe Migrant Head Start Brawley	Brawley
Childcare	Icoe - Cds Kids R Us Iii State Preschool	Brawley
Childcare	Icoe - Ecep Brawley Hawks Head Start Center	Brawley
Childcare	Icoe - Ecep Head Start Program - Brawley Panthers	Brawley
Childcare	Together For Children	Brawley
Childcare	United Families Inc. - Calipatria	Calipatria
Childcare	United Families Inc. - Calipatria State Preschool	Calipatria
Childcare	United Families, Inc. - Westmorland CDC	Westmorland
Childcare	Icoe - Ecep Roadrunners Head Start Center	Westmorland
Childcare[2]	Bca Little Lions	Brawley
Private School	Brawley Christian Academy	Brawley
Private School	Westmorland Basic Christian School	Westmorland
Public School	Myron D. Witter Elementary	Brawley
Public School	Westmorland Elementary	Westmorland
Public School	Fremont Primary	Calipatria
Public School	Mulberry Elementary	Brawley
Public School	Phil D. Swing Elementary	Brawley
Public School	Calipatria High	Calipatria
Public School	J. W. Oakley Elementary	Brawley
Public School	Magnolia Elementary	Brawley
Public School	Bill E. Young Jr. Middle	Calipatria
Public School	Miguel Hidalgo Elementary	Brawley
Public School	Desert Valley High (Continuation)	Brawley
Public School	Barbara Worth Junior High	Brawley
Public School	Renaissance	Brawley
Public School	Brawley Union High	Brawley
Residential Care Facility for Adult	Mackenzie Care Home Iii	Brawley
Residential Care Facility for Adult	Tender Loving Care Home	Brawley
Residential Care Facility for Adult	Tender Loving Care Ii	Brawley
Residential Care Facility for Adult	Villa Adrianna	Brawley
Residential Care Facility for Child	Varsity Team Inc #4	Brawley
Hospital	Pioneers Memorial Healthcare District	Brawley
Hospital	Pioneers Health Center	Brawley
Hospital[4]	Imperial County Behavioral Health Services: Mental Health	Brawley
Hospital[4]	Imperial County Behavioral Health Services: Adult Anxiety	Brawley

Table E. Sensitive Receptors in the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Receptor Type	Receptor Name	City
Hospital[4]	Imperial County Behavioral Health Services: Adult Wellness	Brawley
Hospital[4]	Imperial County Behavioral Health Services: Youth And Young Adult Services	Brawley
Long Term Care Facility[5]	Imperial Heights Healthcare And Wellness Centre	Brawley
Playground/Park/Sportfield	Alyce Gereaux Park	Brawley
Playground/Park/Sportfield	Volunteer Park	Brawley
Playground/Park/Sportfield	Brawley Parks & Recreation	Brawley
Playground/Park/Sportfield	Warner Park	Brawley
Playground/Park/Sportfield	Westmorland City Park	Brawley
Playground/Park/Sportfield	Ed Soto Field	Brawley
Playground/Park/Sportfield	Blake Davis Skateboard Park	Brawley
Playground/Park/Sportfield	Sorensen Park	Calipatria
Playground/Park/Sportfield	Red Hill Park	Calipatria
Playground/Park/Sportfield	Westmorland City Park	Westmorland
Playground/Park/Sportfield	Loves Travel Stop-Dog Park	Westmorland

Notes:

[1] Child care center receptors, private and public school receptors identified through the Homeland Infrastructure Foundation-Level Data (HIFLD) Platform. Available at: https://hifld-geoplatform.opendata.arcgis.com/datasets/004fac3baff540bc9263341f3e06a51e_0/explore?location=32.9786 26%2C-115.534040%2C14.63. Accessed: March 2024.

[2] Child care center receptor, adult and child care residential facility receptors are identified through the Department of Social Services (CDSS). Available at: https://www.ccld.dss.ca.gov/carefacilitysearch/?rewrite=downloaddata. Accessed: March 2024.

[3] Hospital facility receptors are identified through the Imperial County Network of Care. Available at: https://imperial.networkofcare.org/mh/index.aspx. Accessed: March 2024.

[4] Behavioral Health Service facility receptors are identified through the Imperial County Behavioral Health Services. Available at: https://imperial.networkofcare.org/mh/index.aspx. Accessed: March 2024.

[5] Long-Term Care Facility and Playground/Park/Sportfield receptors are identified by conducting a standard Google search. Accessed: March 2024.

APPENDIX F
PERMITTING AND ENFORCEMENT SUPPORTING INFORMATION

Table F-1a. ICAPCD Permitted Facilities within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
4674	Soil Remediation	ES Engineering Services, LLC	1002 H St	Brawley	CA	92227
4721	Service Station	Calipatria Queen Market, Inc. dba Calipatria Queen Market	101 E. Main St.	Calipatria	CA	92233
4522	Soil Remediation	Moller Investment Group, Inc.	104 W. Main Street	Brawley	CA	92227
3138	Service Station	El Sol Market	110 Main Street	Westmorland	CA	92281
3490	Combustion	Imperial Irrigation District	1102 E Simpson Rd	Calipatria	CA	92233
4150	Service Station	RNPM Inc.	1190 S. Brawley Ave.	Brawley	CA	92227
2806	Combustion	Niland County Sanitation District	125 W. Alcott Rd	Niland	CA	92257
4090	Hay Compressing	Planters Hay Inc.	1295 Highway 78	Brawley	CA	92227
535	Petro. Distrib.	Mann Company	1313 Main St.	Brawley	CA	92227
2169	SS Cardlock	Mann Company	1313 E. Main St.	Brawley	CA	92227
3639	Beef Feedlot	Foster Feed Yard, Inc.	1350 East Keystone Road	Brawley	CA	92227
4264	Compost	Imperial Valley Compost LLC	1408 East Highway 78	Brawley	CA	92227
3679	Beef Feedlot	Mesquite Cattle Feeders Inc.	1450 E. Shank Road	Brawley	CA	92227
4335	Compost	Spreadco, Inc.	1450 Shank Road	Brawley	CA	92227
3653	Beef Feedlot	Mesquite Cattle Feeders, Inc.	1504 E. Hwy. 78	Brawley	CA	92227
4198	Combustion	City of Brawley	1505 Jones Street	Brawley	CA	92227
2537	Combustion	City of Brawley	1515 Jones Street	Brawley	CA	92227
4586	Compost	Bull Holdings Corp.	1590 East Gonder Rd.	Brawley	CA	92227
3645	Beef Feedlot	Moiola Bros. Cattle Feeders	1594 Gonder Road	Brawley	CA	92227
2288	Paint Booth	Brawley Auto Body	1667 E. Main St	Brawley	CA	92227
438	Service Station	Prime Fuel & Mini Mart	1696 Main Street	Brawley	CA	92227
4126	Service Station	Petromart Retail Group, Inc. dba Brawley Fuel and Food #2	1691 E. Main Street	Brawley	CA	92227
3609	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	1698 I Street	Brawley	CA	92227
3630	Beef Feedlot	Cameiro Heifer Ranch	195 W. Carey Road	Brawley	CA	92227
4672	Compost	Trusource, LLC	195 W. Carey Rd.	Brawley	CA	92227
3098	Combustion	City of Westmorland	200 West 1st St.	Westmorland	CA	92281
522	Service Station	Axis-MSO, LLC	201 West Main Street	Brawley	CA	92227
4521	Soil Remediation	Moller Investment Group, Inc.	201 W. Main Street	Brawley	CA	92227
3878	Combustion	Pioneers Memorial Hospital	207 W. Legion Rd.	Brawley	CA	92227
3296	Combustion	Time Warner Cable	215 E Street	Brawley	CA	92227
4260	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	CA	92281
4261	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	CA	92281
4375	Combustion	Viridos	250 W. Schrimpf Rd.	Calipatria	CA	92233
2573	Service Station	Matthew D Venture Inc	300 West Main St.	Westmorland	CA	92281
2026	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	CA	92227
2098	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	CA	92227

Table F-1a. ICAPCD Permitted Facilities within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
4555	Geothermal	CalEnergy Operating Corporation	324 W. Sinclair Rd.	Calipatria	CA	92233
2120	Waste Disposal	CalEnergy Operating Corporation	3301 W. Hwy. 86	Brawley	CA	92227
1927	Geothermal	CalEnergy Operating Corporation	342 W Sinclair Road	Calipatria	CA	92233
3814	Combustion	City of Brawley Police Dept.	351 Main Street	Brawley	CA	92227
3678	Beef Feedlot	Superior Cattle Feeders, LLC	352 E. Shank Road	Brawley	CA	92227
3379	Milling	Shank Seed LLC	3900 McConnell Rd.	Brawley	CA	92227
423	Service Station	Petromart Retail Group, Inc. dba Brawley Fuel and Food	395 W. Main St.	Brawley	CA	92227
3682	Beef Feedlot	Moiola Bros. Cattle Feeders	3990 Holt Ave.	Brawley	CA	92227
3339	Combustion	Cellco Partnership dba Verizon Wireless	402 Beal Road	Niland	CA	92257
3507	Power Generation	Niland Turbine Plant	402 Beal Road	Niland	CA	92257
3734	Geothermal	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	CA	92233
4233	Combustion	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	CA	92233
4216	Geothermal	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	CA	92233
1365	Power Generation	Imperial Irrigation District	4195 Dogwood Rd., Unit 1	Brawley	CA	92227
1386	Power Generation	Imperial Irrigation District	4195 Dogwood Road, Unit 2	Brawley	CA	92227
3866	Combustion	Three Flags Citrus, LLC	4300 Hwy 86	Brawley	CA	92227
2520	Milling	K-F Seeds	4307 Fifield Road	Brawley	CA	92227
3610	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	4560 Green Road	Brawley	CA	92227
4434	Combustion	Rockwood Ag Services, Inc.	47 Rutherford Rd.	Brawley	CA	92227
636	Petro. Storage	I. C. Public Works	4736 Hwy. 111	Brawley	CA	92227
2401	Milling	Rubin Seeds, Inc.	4746 Hwy. 111	Brawley	CA	92227
3513	Miscellaneous	Brawley Union High School	480 N. Imperial Avenue	Brawley	CA	92227
2657	Non-Retail SS	CalEnergy Operating Corporation	480 W. Sinclair Rd	Calipatria	CA	92233
599	Manufacturing	Rockwood Ag Services	5 Shank Rd.	Brawley	CA	92227
2395	Beef Feedlot	Hein Hettinga	5004 Brandt	Brawley	CA	92227
2529	Combustion	City of Brawley	5015 Best Road	Brawley	CA	92227
2410	SS Cardlock	Cardlock Fuels System, LLC	502 E. Main St.	Westmorland	CA	92281
2988	Combustion	Qwest Communications Corp.	526 East D Street	Brawley	CA	92227
3068	Manufacturing	K. W. Kuhlen Hay Milling	5300 Kalin Rd.	Brawley	CA	92227
2526	Combustion	City of Westmorland	5305 Martin Rd.	Westmorland	CA	92281
2513	Non-Retail SS	Imperial Irrigation District	5364 Hovely Rd.	Brawley	CA	92227
4257	Manufacturing	Oberon Fuels	5461 Kershaw Road	Brawley	CA	92227
3660	Beef Feedlot	Superior Cattle Feeders, LLC	5455 Kershaw Road	Brawley	CA	92227
3097	Combustion	Superior Cattle Feeders, LLC	551 S. Industrial Ave.	Calipatria	CA	92233
4431	Non-Retail SS	Superior Cattle Feeders, LLC	551 S. Industrial Avenue	Calipatria	CA	92233
3089	Manufacturing	OWB Packers, LLC	57 E. Shank Road	Brawley	CA	92227

Table F-1a. ICAPCD Permitted Facilities within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
2296	Paint Booth	D & H Body Shop	575 US Hwy. 111	Brawley	CA	92227
3952	Manufacturing	Helena Agri-Enterprises, LLC	600 S. Brown Ave.	Calipatria	CA	92233
2472	Hay Compressing	Border Valley Trading, LTD	604 E. Mead Road	Brawley	CA	92227
3352	Milling	All American Grain Company	6050 Hwy. 111	Calipatria	CA	92233
3658	Beef Feedlot	Superior Cattle Feeders, LLC	6050 Hwy. 111	Calipatria	CA	92233
364	Service Station	MF. Esho, Inc.	610 S. Brawley Avenue	Brawley	CA	92227
3661	Beef Feedlot	Superior Cattle Feeders, LLC	612 Simpson Road	Calipatria	CA	92233
4641	Non-Retail SS	Kiewit	6140 Poe Rd.	Brawley	CA	92227
4105	Paint Booth	Radco, Inc.	615A Old Hwy. 111	Brawley	CA	92227
2874	Combustion	Golden State Water Company	621 S. Soresen Avenue	Calipatria	CA	92233
2530	Hay Compressing	Golden Eagle Hay Company Inc.	640 Railroad Ave.	Calipatria	CA	92233
3659	Beef Feedlot	Superior Cattle Feeders, LLC	649 E. Rutherford Road	Brawley	CA	92227
1891	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	CA	92233
4527	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	CA	92233
2494	SS Cardlock	Double Eagle Scale & Fuel, Inc.	701 N. Sorensen Ave.	Calipatria	CA	92233
3668	Beef Feedlot	Brandt Co., Inc.	7015 Brandt Road	Calipatria	CA	92233
4612	Compost	Brandt Co., Inc.	7015 Brandt Road	Calipatria	CA	92233
2130	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
2131	Non-Retail SS	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
2139	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
2479	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
2750	Paint Booth	Calipatria State Prison	7018 Blair Rd.	Calipatria	CA	92233
2996	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
2998	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
2999	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
3001	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
3525	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
3526	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
3527	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
4274	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	CA	92233
4520	Combustion	CalEnergy Operating Corporation	7030 Gentry Rd	Calipatria	CA	92233
4546	Geothermal	CalEnergy Operating Corporation	7030 Gentry Rd	Calipatria	CA	92233
2536	Combustion	City of Brawley	760 Willard Avenue	Brawley	CA	92227
390	Milling	Top Notch Seed, Inc.	767 S. 5th Street	Brawley	CA	92227
1506	Incinerator	Frye Chapel & Mortuary	799 Brawley Avenue	Brawley	CA	92227
1184	Service Station	Shahrazad Inc. dba Niland Gas Inc	8004 Hwy. 111	Niland	CA	92257

Table F-1a. ICAPCD Permitted Facilities within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
3677	Beef Feedlot	Mesquite Cattle Feeders, Inc.	801 E. Rutherford Road	Brawley	CA	92227
4644	Miscellaneous	Niland Public Safety Facility/Fire STA. 7	8071 Luxor Avenue	Niland	CA	92257
4666	Paint Booth	El Centro Motors	811 S. Brawley Avenue	Brawley	CA	92227
3280	Combustion	Brawley Fire Department	815 Main Street	Brawley	CA	92227
2593	Combustion	Imperial Irrigation District	904 N. Dogwood Rd.	Brawley	CA	92227
2454	Incinerator	U.S. Fish & Wildlife	906 W. Sinclair Rd.	Calipatria	CA	92233
2911	Non-Retail SS	U.S. Fish & Wildlife	906 West Sinclair Rd	Calipatria	CA	92233
3805	Combustion	LA County Sanitation	6502 CA-78	Brawley	CA	92227
3829	Non-Retail SS	LA County Sanitation	6330 CA-78	Brawley	CA	92227
4404	Hay Compressing	United Hay Press, Inc	1853 W. Frontage Road, A St	Brawley	CA	92227
4572	Beef Feedlot	Superior Cattle Feeders, LLC	S. Weist Lake, Moorhead Canal 207	Brawley	CA	92227
2866	Combustion	Imperial Irrigation District	5364 Hovley Rd.	Westmorland	CA	92281
2907	Petro. Storage	City of Brawley	948 Ken Bemis Drive	Brawley	CA	92227
2610	Service Station	Raynash, Inc. dba Fillco 1	977 Main Street	Brawley	CA	92227
1920	Mining	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	CA	92227
4005	Mining	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	CA	92227
4578	Combustion	Western Mesquite Mines, Inc.	6502 E. Hwy. 78	Brawley	CA	92227
4638	Aggregate	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	CA	92227
2000	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	CA	92233
4587	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	CA	92233
4693	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	CA	92233
1550	Manufacturing	Wingate Company	Dogwood/Keystone	Brawley	CA	92227
3695	Combustion	City of Brawley	Legion Rd. & Dogwood Rd.	Brawley	CA	92227
4006	Combustion	Western Mesquite Mines, Inc.	6502 East Highway 78	Brawley	CA	92227
3073	Waste Disposal	I. C. Public Works	Hovley & Fredericks Rd.	Brawley	CA	92227
4405	Combustion	Wm. Bolthouse Farms, Inc.	5337 Lack Rd. & Hwy. 86	Westmorland	CA	92281
4380	Combustion	City of Brawley	S. 9th Street	Brawley	CA	92227
4169	Combustion	U.S. Border Patrol El Centro	Hwy. 86 & Hwy. 78	Imperial County	CA	
2669	Combustion	MCI Worldcom	Hwy. 111 & Gillespie Road	Niland	CA	92257
3585	Non-Retail SS	The Elmore Company	3104 W. Hwy. 86	Westmorland	CA	92281

Notes:

1. This table presents all permitted facilities located in the North End Phase 1 Community, i.e., those within the cities of Brawley, Calipatria, Niland, and Westmorland.

Abbreviations:

SS - Stationary Source

Table F-1b. ICAPCD Permit Classifications for Facilities within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Permit Description	Permit Count	Percentage
Aggregate	1	1%
Asphalt	0	0%
Beef Feedlot	15	11%
Combustion	40	29%
Compost	5	4%
Concrete	2	1%
Dairy	0	0%
Dry Cleaner	0	0%
Geothermal	10	7%
Geothermal Well	0	0%
Hay Compressing	4	3%
Incinerator	2	1%
Manufacturing	6	4%
Milling	5	4%
Mining	2	1%
Miscellaneous	6	4%
Non-Retail Ss	8	6%
Paint Booth	7	5%
Paint Booth	0	0%
Painting	0	0%
Petro. Distrib.	1	1%
Petro. Storage	2	1%
Power Generation	3	2%
Sandblasting	0	0%
Service Station	11	8%
Soil Remediation	3	2%
Ss Cardlock	3	2%
Storage	0	0%
Waste Disposal	2	1%
Wood Processing	0	0%
TOTAL	**138**	100%

Notes:

1. Permits for sources located at facilities within the North End Phase 1 Community are categorized by source type in the table above according to the permit descriptions.

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2021	1174	Aggregate	I. C. Public Works	Various Locations	Imperial County	9/7/2021
2021	3273	Aggregate	I. C. Public Works	Various Locations	Imperial County	9/7/2021
2021	2395	Beef Feedlot	Hein Hettinga	5004 Brandt	Brawley	10/25/2021
2021	3630	Beef Feedlot	Cameiro Heifer Ranch	195 W. Carey Road	Brawley	10/26/2021
2021	3639	Beef Feedlot	Foster Feed Yard, Inc.	1350 East Keystone Road	Brawley	10/27/2021
2021	3640	Beef Feedlot	Foster Feed Yard, Inc.	3403 Casey Road	Brawley	10/27/2021
2021	3645	Beef Feedlot	Moiola Bros. Cattle Feeders	1594 Gonder Road	Brawley	12/2/2021
2021	3647	Beef Feedlot	Moiola Bros. Cattle Feeders LTD	2001 E. Keystone Road	Brawley	12/2/2021
2021	3653	Beef Feedlot	Mesquite Cattle Feeders, Inc.	1504 E. Hwy. 78	Brawley	11/8/2021
2021	3658	Beef Feedlot	Superior Cattle Feeders, LLC	6050 Hwy. 111	Calipatria	11/18/2021
2021	3659	Beef Feedlot	Superior Cattle Feeders, LLC	649 E. Rutherford Road	Brawley	12/1/2021
2021	3660	Beef Feedlot	Superior Cattle Feeders, LLC	5455 Kershaw Road	Brawley	11/18/2021
2021	3661	Beef Feedlot	Superior Cattle Feeders, LLC	612 Simpson Road	Calipatria	11/18/2021
2021	3668	Beef Feedlot	Brandt Co Inc.	7015 Brandt Road	Calipatria	12/13/2021
2021	3677	Beef Feedlot	Superior Cattle Feeders, LLC	801 E. Rutherford Road	Brawley	12/1/2021
2021	3678	Beef Feedlot	Superior Cattle Feeders, LLC	352 E. Shank Road	Brawley	11/17/2021
2021	3679	Beef Feedlot	Superior Cattle Feeders, LLC	1450 Shank Road	Brawley	11/17/2021
2021	3682	Beef Feedlot	Moiola Bros. Cattle Feeders	3990 Holt Ave.	Brawley	12/2/2021
2021	4437	Beef Feedlot	Cameiro Heifer Ranch	505 W. Keystone Road	Brawley	10/26/2021
2021	4572	Beef Feedlot	Superior Cattle Feeders, LLC	S. Weist Lake, Moorhead Canal 207	Brawley	12/1/2021
2021	642	Combustion	Pioneers Memorial Healthcare District	207 W. Legion Road	Brawley	2/17/2021
2021	2130	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	2139	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	2526	Combustion	City Of Westmorland	5305 Martin Rd.	Westmorland	8/4/2021
2021	2529	Combustion	City of Brawley	5015 Best Road	Brawley	7/29/2021
2021	2536	Combustion	City of Brawley	760 Willard Avenue	Brawley	7/28/2021
2021	2537	Combustion	City of Brawley	1515 Jones St.	Brawley	7/28/2021
2021	2669	Combustion	MCI Worldcom	Hwy. 111 & Gillespie Road	Niland	11/2/2021
2021	2806	Combustion	Niland County Sanitation District	125 W. Alcott Rd	Niland	10/22/2021
2021	2866	Combustion	Imperial Irrigation District	5364 Hovley Rd.	Westmorland	9/2/2021
2021	2874	Combustion	Golden State Water Company	621 S. Soresen Avenue	Calipatria	3/10/2021
2021	2883	Combustion	MCI Worldcom	Ogilby Road	Imperial County	9/3/2021
2021	2954	Combustion	Qwest Communications Corp.	1769 Nider Rd.	Niland	3/26/2021

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2021	2955	Combustion	Qwest Communications Corp.	500 E. Evan Hewes Hwy.	Imperial County	Not Listed
2021	2988	Combustion	Qwest Communications Corp.	526 East D Street	Brawley	3/26/2021
2021	2996	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	2998	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	3097	Combustion	Superior Cattle Feeders, LLC	551 S. Industrial Ave.	Calipatria	7/21/2021
2021	3098	Combustion	City Of Westmorland	200 West 1st St.	Westmorland	8/4/2021
2021	3280	Combustion	Brawley Fire Department	815 Main Street	Brawley	9/1/2021
2021	3299	Combustion	Imperial Irrigation District	Black Mountain	Imperial County	9/2/2021
2021	3300	Combustion	Imperial Irrigation District	Brawley Microwave Site	Brawley	2/7/2021
2021	3301	Combustion	Imperial Irrigation District	Niland Microwave Site	Niland	2/7/2021
2021	3303	Combustion	Imperial Irrigation District	Pilot Knob Site	Imperial County	2/7/2021
2021	3339	Combustion	Cellco Partnership dba Verizon Wireless	402-A East Beal Road	Niland	11/30/2021
2021	3490	Combustion	Imperial Irrigation District	Midway Substation	Calipatria	9/2/2021
2021	3609	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	1698 I Street	Brawley	Not Listed
2021	3610	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	4560 Green Road	Brawley	Not Listed
2021	3695	Combustion	City of Brawley	Legion Rd. & Dogwood Rd.	Brawley	7/29/2021
2021	3752	Combustion	Cellco Partnership dba Verizon Wireless	Ogilby Road & Hwy. 8	Imperial County	8/10/2021
2021	3805	Combustion	LA County Sanitation	6502 E. Highway 78	Brawley	5/12/2021
2021	3814	Combustion	City of Brawley Police Dept.	351 Main Street	Brawley	9/7/2021
2021	3866	Combustion	Three Flags Citrus, LLC	4300 Hwy 86	Brawley	8/25/2021
2021	3878	Combustion	Pioneers Memorial Hospital	205 W. Legion Rd.	Brawley	2/17/2021
2021	3953	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	Black Mountain	Imperial County	Not Listed
2021	4006	Combustion	Western Mesquite Mines, Inc.	6502 East Highway 78	Brawley	4/8/2021
2021	4169	Combustion	US Border Patrol El Centro	Hwy. 86 & Hwy. 78	Imperial County	3/3/2021
2021	4198	Combustion	City of Brawley	1505 Jones Street	Brawley	7/28/2021
2021	4233	Combustion	Hudson Ranch Power I LLC	409 W. McDonald Road	Calipatria	5/12/2021
2021	4260	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	3/5/2021
2021	4261	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	3/5/2021
2021	4274	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	4380	Combustion	City Of Brawley	S. 9th Street	Brawley	7/29/2021
2021	4405	Combustion	Wm. Bolthouse Farms, Inc.	5337 Lack Rd. & Hwy. 86	Westmorland	3/9/2021
2021	4409	Combustion	CalEnergy Operating Corporation	Various- CalEnergy Facilities	Calipatria	12/8/2021

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2021	4410	Combustion	CalEnergy Operating Corporation	Various- CalEnergy Facilities	Calipatria	12/8/2021
2021	4428	Combustion	CalEnergy Operating Corporation	CalEnergy Facilities	Calipatria	12/8/2021
2021	4429	Combustion	CalEnergy Operating Corporation	CalEnergy Facilities	Calipatria	12/8/2021
2021	4430	Combustion	CalEnergy Operating Corporation	Various- Leathers Facilities	Calipatria	12/8/2021
2021	4434	Combustion	Rockwood Chemical Co.	47 Rutherford Rd.	Brawley	9/20/2021
2021	4445	Combustion	CalEnergy Operating Corporation	Various- CalEnergy	Calipatria	12/8/2021
2021	4520	Combustion	CalEnergy Operating Corporation	CalEnergy Operating Corporation	Calipatria	12/8/2021
2021	4545	Combustion	Imperial Irrigation District	Various Locations	Imperial County	9/21/2021
2021	4552	Combustion	Imperial Irrigation District	Various Locations	Imperial County	9/22/2021
2021	4578	Combustion	Western Mesquite Mines, Inc.	6502 E. Hwy. 78	Brawley	4/8/2021
2021	4593	Combustion	Imperial Irrigation District	Various Locations	Imperial County	9/22/2021
2021	4594	Combustion	Imperial Irrigation District	Various Locations	Imperial County	9/23/2021
2021	4264	Compost	Imperial Valley Compost LLC	1408 East Highway 78	Brawley	9/7/2021
2021	4265	Compost	Imperial Valley Compost LLC	3403 Casey Road	Brawley	9/7/2021
2021	4335	Compost	Spreadco, Inc.	1450 Shank Road	Brawley	9/2/2021
2021	4612	Compost	Brandt Co., Inc.	7015 Brandt Road	Calipatria	9/28/2021
2021	2026	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	7/1/2021
2021	2098	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	7/1/2021
2021	3590	Concrete	Gibson & Schaefer, Inc.	Various Locations	Imperial County	9/27/2021
2021	1890	Geothermal	CalEnergy Operating Corporation	786 W. Sinclair Road	Calipatria	5/26/2021
2021	1891	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	5/26/2021
2021	1927	Geothermal	CalEnergy Operating Corporation	Leathers- 342 Sinclair Rd.	Calipatria	5/26/2021
2021	2000	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	5/25/2021
2021	3734	Geothermal	Hudson Ranch Power I, LLC	409 West McDonald Road	Calipatria	5/12/2021
2021	3979	Geothermal	Hudson Ranch Power I, LLC	Southwest of Niland, Section 13, T11S, R13E	Niland	5/12/2021
2021	4216	Geothermal	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	5/12/2021
2021	4446	Geothermal	CalEnergy Operating Corporation	Various Locations - CalEnergy Facilities	Calipatria	5/27/2021
2021	4496	Geothermal	CalEnergy Operating Corporation	CalEnergy Region 1	Calipatria	5/27/2021
2021	4527	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	5/27/2021
2021	4546	Geothermal	CalEnergy Operating Corporation	CalEnergy Region 2 Power Plant	Calipatria	5/27/2021
2021	4555	Geothermal	CalEnergy Operating Corporation	324 W. Sinclair Rd.	Calipatria	5/27/2021
2021	4587	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	5/27/2021

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2021	4090	Hay Compressing	Planters Hay Inc.	1295 Highway 78	Brawley	9/7/2021
2021	2530	Hay Compressing	Golden Eagle Hay Company Inc.	640 Railroad Ave	Calipatria	6/29/2021
2021	4404	Hay Compressing	United Hay Press, Inc.	1853 West Frontage Road	Brawley	9/14/2021
2021	1506	Incinerator	Frye Chapel & Mortuary	799 Brawley Avenue	Brawley	1/21/2021
2021	2454	Incinerator	U. S. Fish & Wildlife	906 W. Sinclair Rd	Calipatria	11/10/2021
2021	1550	Manufacturing	Wingate Company	Dogwood/keystone	Brawley	9/15/2021
2021	3068	Manufacturing	K. W. Kuhlen Hay Milling	5300 Kalin Rd.	Brawley	8/9/2021
2021	3089	Manufacturing	OWB Packers., LLC	57 E. Shank Road	Brawley	5/27/2021
2021	3952	Manufacturing	Helena Agri-Enterprises, LLC	600 S. Brown	Calipatria	10/13/2021
2021	4257	Manufacturing	Oberon Fuels	5451 Kershaw Road	Brawley	10/13/2021
2021	390	Milling	Top Notch Seed, Inc.	767 S. 5th St.	Brawley	9/1/2021
2021	2401	Milling	Rubin Seeds, Inc.	4746 Hwy 111	Brawley	10/13/2021
2021	2520	Milling	K-F Seeds	4307 Fifield Rd	Brawley	9/15/2021
2021	3352	Milling	All American Grain, Inc.	6050 Hwy. 111	Calipatria	8/17/2021
2021	3379	Milling	Shank Seed, LLC	3900 McConnell Rd.	Brawley	8/25/2021
2021	1920	Mining	Western Mesquite Mines, Inc.	6502 East Us Highway 78	Brawley	4/8/2021
2021	4005	Mining	Western Mesquite Mines, Inc.	6502 East Us Highway 78	Brawley	4/8/2021
2021	2479	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	2999	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	3001	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	3513	Miscellaneous	Brawley Union Highschool	480 N. Imperial Avenue	Brawley	10/4/2021
2021	3527	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	2131	Non-Retail SS	Calipatria State Prison	7018 Blair Road	Calipatria	1/23/2021
2021	2513	Non-Retail SS	Imperial Irrigation District	5364 Hovely Rd.	Brawley	2/12/2021
2021	2657	Non-Retail SS	CalEnergy Operating Corporation	480 W. Sinclair Rd	Calipatria	8/4/2021
2021	2911	Non-Retail SS	U. S. Fish & Wildlife	906 West Sinclair Rd	Calipatria	12/9/2021
2021	3585	Non-Retail SS	The Elmore Company	3104 W. Hwy. 86	Westmorland	7/29/2021
2021	3829	Non-Retail SS	LA County Sanitation	6330 E. Highway 78	Brawley	5/12/2021
2021	4431	Non-Retail SS	Superior Cattle Feeders, LLC	551 S. Industrial Avenue	Calipatria	7/21/2021
2021	2288	Paint Booth	Brawley Auto Body	1667 E. Main St	Brawley	9/20/2021
2021	2296	Paint Booth	D & H Body Shop	575 Hwy 111	Brawley	9/2/2021
2021	2750	Paint Booth	Calipatria State Prison	D-Facility	Calipatria	Not Listed

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2021	3525	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	3526	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	Not Listed
2021	4105	Paint Booth	Radco, Inc.	615A Old Hwy. 111	Brawley	10/6/2021
2021	535	Petro. Distrib.	Mann Company	1313 Main St.	Brawley	7/6/2021
2021	636	Petro. Storage	I. C. Public Works	4736 Hwy. 111	Brawley	11/10/2021
2021	2907	Petro. Storage	City of Brawley	948 Ken Bemis Drive	Brawley	4/1/2021
2021	1365	Power Generation	Imperial Irrigation District	4195 Dogwood Rd., Unit 1	Brawley	4/13/2021
2021	1386	Power Generation	Imperial Irrigation District	4195 Dogwood Road, Unit 2	Brawley	4/13/2021
2021	3507	Power Generation	IID Niland Turbine Plant	402 Beal Road	Niland	4/13/2021
2021	364	Service Station	MF. Esho, Inc.	610 S. Brawley Avenue	Brawley	8/26/2021
2021	423	Service Station	Petromart Retail Group, Inc. DBA Brawley Fuel and Food	395 W. Main St.	Brawley	1/14/2021
2021	438	Service Station	Prime Fuel & Mini Mart	1686 Main Street	Brawley	5/3/2021
2021	1184	Service Station	Petromart Retail Group, Inc. DBA Niland Fuel and Food	8004 Hwy. 111	Niland	4/13/2021
2021	1662	Service Station	Jaco Oil Company	105 E. Main St.	Calipatria	11/23/2021
2021	2610	Service Station	Raynash Inc dba Fillco 1	977 Main Street	Brawley	7/12/2021
2021	3138	Service Station	El Sol Market	110 Main Street	Westmorland	7/6/2021
2021	4126	Service Station	Petromart Retail Group, Inc. dba Brawley Fuel and Food #2	1691 E. Main Street	Brawley	2/13/2021
2021	4521	Soil Remediation	Moller Investment Group, Inc.	201 W. Main Street	Brawley	9/1/2021
2021	4522	Soil Remediation	Moller Investment Group, Inc.	104 W. Main Street	Brawley	9/1/2021
2021	4539	Soil Remediation	ES Engineering Services, LLC	Various	Imperial County	Not Listed
2021	2169	SS Cardlock	Mann Company	1313 E. Main St.	Brawley	7/6/2021
2021	2494	SS Cardlock	Double Eagle Scale & Fuel, Inc.	701 N. Sorensen	Calipatria	6/18/2021
2021	2120	Waste Disposal	CalEnergy Operating Corporation	3301 W. Hwy. 86	Brawley	6/30/2021
2021	3073	Waste Disposal	I. C. Public Works	Hovley & Fredericks Rd.	Brawley	10/4/2021
2021	3078	Waste Disposal	I. C. Public Works	Cuff Rd., Approx. 3 Miles NE	Niland	4/15/2021
2021	3082	Waste Disposal	I. C. Public Works	Spa Road, Hot Spa	Niland	10/12/2021
2022	1174	Aggregate	I. C. Public Works	Various Locations	Imperial County	5/4/2022
2022	3273	Aggregate	I. C. Public Works	Various Locations	Imperial County	5/4/2022
2022	4638	Aggregate	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	11/16/2022
2022	3668	Beef Feedlot	Brandt Co Inc.	7015 Brandt Road	Calipatria	12/1/2022
2022	3630	Beef Feedlot	Cameiro Heifer Ranch	195 W. Carey Road	Brawley	10/24/2022
2022	4437	Beef Feedlot	Cameiro Heifer Ranch	505 W. Keystone Road	Brawley	10/24/2022

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2022	3639	Beef Feedlot	Foster Feed Yard, Inc.	1350 East Keystone Road	Brawley	11/18/2022
2022	3640	Beef Feedlot	Foster Feed Yard, Inc.	3403 Casey Road	Brawley	11/18/2022
2022	2395	Beef Feedlot	Hein Hettinga	5004 Brandt	Brawley	10/7/2022
2022	3653	Beef Feedlot	Mesquite Cattle Feeders, Inc.	1504 E. Hwy. 78	Brawley	11/28/2022
2022	3645	Beef Feedlot	Moiola Bros. Cattle Feeders	1594 Gonder Road	Brawley	11/15/2022
2022	3682	Beef Feedlot	Moiola Bros. Cattle Feeders	3990 Holt Ave.	Brawley	11/15/2022
2022	3647	Beef Feedlot	Moiola Bros. Cattle Feeders LTD	2001 E. Keystone Road	Brawley	11/15/2022
2022	3660	Beef Feedlot	Superior Cattle Feeders, LLC	5455 Kershaw Road	Brawley	10/3/2022
2022	3661	Beef Feedlot	Superior Cattle Feeders, LLC	612 Simpson Road	Calipatria	10/3/2022
2022	3658	Beef Feedlot	Superior Cattle Feeders, LLC	6050 Hwy. 111	Calipatria	9/15/2022
2022	3659	Beef Feedlot	Superior Cattle Feeders, LLC	649 E. Rutherford Road	Brawley	10/20/2022
2022	3677	Beef Feedlot	Superior Cattle Feeders, LLC	801 E. Rutherford Road	Brawley	10/20/2022
2022	3678	Beef Feedlot	Superior Cattle Feeders, LLC	352 E. Shank Road	Brawley	10/27/2022
2022	3679	Beef Feedlot	Superior Cattle Feeders, LLC	1450 Shank Road	Brawley	10/27/2022
2022	4572	Beef Feedlot	Superior Cattle Feeders, LLC	S. Weist Lake, Moorhead Canal 207	Brawley	10/20/2022
2022	3280	Combustion	Brawley Fire Department	815 Main Street	Brawley	1/25/2022
2022	4409	Combustion	CalEnergy Operating Corporation	Various- CalEnergy Facilities	Calipatria	11/30/2022
2022	4410	Combustion	CalEnergy Operating Corporation	Various- CalEnergy Facilities	Calipatria	11/30/2022
2022	4428	Combustion	CalEnergy Operating Corporation	CalEnergy Facilities	Calipatria	11/30/2022
2022	4429	Combustion	CalEnergy Operating Corporation	CalEnergy Facilities	Calipatria	11/30/2022
2022	4430	Combustion	CalEnergy Operating Corporation	Various- Leathers Facilities	Calipatria	11/30/2022
2022	4445	Combustion	CalEnergy Operating Corporation	Various- CalEnergy	Calipatria	11/30/2022
2022	4520	Combustion	CalEnergy Operating Corporation	CalEnergy Operating Corporation	Calipatria	11/30/2022
2022	2130	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	12/7/2022
2022	2139	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	12/7/2022
2022	2996	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	12/7/2022
2022	2998	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	12/7/2022
2022	4274	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	3339	Combustion	Cellco Partnership dba Verizon Wireless	402-A East Beal Road	Niland	7/26/2022
2022	3752	Combustion	Cellco Partnership dba Verizon Wireless	Ogilby Road & Hwy. 8	Imperial County	7/26/2022
2022	4198	Combustion	City of Brawley	1505 Jones Street	Brawley	1/25/2022
2022	2536	Combustion	City of Brawley	760 Willard Avenue	Brawley	3/3/2022

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2022	2537	Combustion	City of Brawley	1515 Jones Street	Brawley	3/3/2022
2022	2529	Combustion	City of Brawley	5015 Best Road	Brawley	3/8/2022
2022	3695	Combustion	City of Brawley	Legion Rd. & Dogwood Rd.	Brawley	3/8/2022
2022	4380	Combustion	City of Brawley	S. 9th Street	Brawley	3/8/2022
2022	3814	Combustion	City of Brawley	351 Main Street	Brawley	5/19/2022
2022	2526	Combustion	City of Westmorland	5305 Martin Rd.	Westmorland	3/14/2022
2022	3098	Combustion	City of Westmorland	200 West 1st St.	Westmorland	3/14/2022
2022	2874	Combustion	Golden State Water Company	621 S. Soresen Avenue	Calipatria	2/22/2022
2022	4260	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	3/5/2022
2022	4261	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	3/5/2022
2022	4233	Combustion	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	4/28/2022
2022	4593	Combustion	Imperial Irrigation District	Various Locations	Imperial County	4/13/2022
2022	4594	Combustion	Imperial Irrigation District	Various Locations	Imperial County	4/13/2022
2022	2866	Combustion	Imperial Irrigation District	5364 Hovley Rd.	Westmorland	5/19/2022
2022	3299	Combustion	Imperial Irrigation District	Black Mountain	Imperial County	6/10/2022
2022	3490	Combustion	Imperial Irrigation District	Midway Substation	Calipatria	6/10/2022
2022	3303	Combustion	Imperial Irrigation District	Pilot Knob Site	Imperial County	6/14/2022
2022	3300	Combustion	Imperial Irrigation District	Brawley Microwave Site	Brawley	7/14/2022
2022	3301	Combustion	Imperial Irrigation District	Niland Microwave Site	Niland	7/14/2022
2022	4545	Combustion	Imperial Irrigation District	Various Locations	Imperial County	8/1/2022
2022	2593	Combustion	Imperial Irrigation District	904 N. Dogwood Rd.	Brawley	8/2/2022
2022	4552	Combustion	Imperial Irrigation District	Various Locations	Imperial County	closed
2022	3953	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	Black Mountain	Imperial County	3/1/2022
2022	3609	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	1698 I Street	Brawley	3/2/2022
2022	3610	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	4560 Green Road	Brawley	3/2/2022
2022	3805	Combustion	LA County Sanitation	6502 E. Highway 78	Brawley	3/1/2022
2022	2669	Combustion	MCI Worldcom	Hwy. 111 & Gillespie Road	Niland	5/31/2022
2022	2883	Combustion	MCI Worldcom	Ogilby Road	Imperial County	5/31/2022
2022	2806	Combustion	Niland County Sanitation District	125 W. Alcott Rd	Niland	5/24/2022
2022	4644	Combustion	Niland Public Safety Facility/Fire STA. 7	8071 Luxor Avenue	Niland	7/16/2022
2022	642	Combustion	Pioneers Memorial Healthcare District	207 W. Legion Road	Brawley	3/2/2022
2022	3878	Combustion	Pioneers Memorial Hospital	205 W. Legion Rd.	Brawley	3/2/2022

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2022	2954	Combustion	Qwest Communications Corp.	1769 Nider Rd.	Niland	3/21/2022
2022	2988	Combustion	Qwest Communications Corp.	526 East D Street	Brawley	3/21/2022
2022	4434	Combustion	Rockwood Chemical Co.	47 Rutherford Rd.	Brawley	4/26/2022
2022	3097	Combustion	Superior Cattle Feeders, LLC	551 S. Industrial Ave.	Calipatria	5/4/2022
2022	3866	Combustion	Three Flag Citrus, LLC	4300 Hwy 86	Brawley	5/24/2022
2022	4184	Combustion	U.S. Border Patrol, El Centro Sector	Marina Rd. & Hwy. 111	Niland	8/16/2022
2022	4169	Combustion	US Border Patrol El Centro	Hwy. 86 & Hwy. 78	Imperial County	8/17/2022
2022	4375	Combustion	Viridos	250 W. Schrimpf Rd.	Calipatria	5/3/2022
2022	4006	Combustion	Western Mesquite Mines, Inc.	6502 East Highway 78	Brawley	3/1/2022
2022	4578	Combustion	Western Mesquite Mines, Inc.	6502 E. Hwy. 78	Brawley	3/1/2022
2022	4405	Combustion	WM. Bolthouse Farms, Inc.	5337 Lack Rd. & Hwy. 86	Westmorland	2/16/2022
2022	4612	Compost	Brandt Co Inc.	7015 Brandt Road	Calipatria	5/25/2022
2022	4264	Compost	Imperial Valley Compost LLC	1408 East Highway 78	Brawley	5/3/2022
2022	4265	Compost	Imperial Valley Compost LLC	3403 Casey Road	Brawley	5/3/2022
2022	4335	Compost	Spreadco, Inc.	1450 Shank Road	Brawley	5/9/2022
2022	2026	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	3/22/2022
2022	2098	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	3/22/2022
2022	3590	Concrete	Gibson & Schaefer, Inc.	Various Locations	Imperial County	9/19/2022
2022	1890	Geothermal	CalEnergy Operating Corporation	786 W. Sinclair Road	Calipatria	5/4/2022
2022	1891	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	5/4/2022
2022	1927	Geothermal	CalEnergy Operating Corporation	Leathers- 342 Sinclair Rd.	Calipatria	5/4/2022
2022	2000	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	5/5/2022
2022	4446	Geothermal	CalEnergy Operating Corporation	Various Locations - CalEnergy Facilities	Calipatria	11/30/2022
2022	4496	Geothermal	CalEnergy Operating Corporation	CalEnergy Region 1	Calipatria	12/5/2022
2022	4527	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	12/5/2022
2022	4546	Geothermal	CalEnergy Operating Corporation	CalEnergy Region 2 Power Plant	Calipatria	12/5/2022
2022	4555	Geothermal	CalEnergy Operating Corporation	324 W. Sinclair Rd.	Calipatria	12/5/2022
2022	4587	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	12/5/2022
2022	3734	Geothermal	Hudson Ranch Power I, LLC	409 West McDonald Road	Calipatria	4/28/2022
2022	3979	Geothermal	Hudson Ranch Power I, LLC	Southwest of Niland, Section 13, T11S, R13E	Niland	4/28/2022
2022	4216	Geothermal	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	4/28/2022
2022	2472	Hay Compressing	Border Valley Trading, LTD	604 E. Mead Road	Brawley	7/29/2022

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2022	2530	Hay Compressing	Golden Eagle Hay Company Inc.	640 Railroad Ave.	Calipatria	2/28/2022
2022	4090	Hay Compressing	Planters Hay Inc.	1295 Highway 78	Brawley	5/4/2022
2022	4404	Hay Compressing	United Hay Press, Inc.	1853 West Frontage Road	Brawley	6/22/2022
2022	1506	Incinerator	Frye Chapel & Mortuary	799 Brawley Avenue	Brawley	8/18/2022
2022	2454	Incinerator	U. S. Fish & Wildlife	906 W. Sinclair Rd	Calipatria	8/24/2022
2022	3952	Manufacturing	Helena Agri-Enterprises, LLC	600 S. Brown	Calipatria	6/21/2022
2022	3068	Manufacturing	K. W. Kuhlen Hay Milling	5300 Kalin Rd.	Brawley	2/23/2022
2022	4257	Manufacturing	Oberon Fuels	5451 Kershaw Road	Brawley	5/2/2022
2022	3089	Manufacturing	OWB Packers, LLC	57 E. Shank Road	Brawley	7/12/2022
2022	1550	Manufacturing	Wingate Company	Dogwood/keystone	Brawley	3/28/2022
2022	3352	Milling	All American Grain, Inc.	6050 Hwy. 111	Calipatria	4/18/2022
2022	2520	Milling	K-F Seeds	4307 Fifield Rd	Brawley	9/6/2022
2022	2401	Milling	Rubin Seeds, Inc.	4746 Hwy 111	Brawley	8/16/2022
2022	3379	Milling	Shank Seed, LLC	3900 McConnell Rd.	Brawley	8/31/2022
2022	390	Milling	Top Notch Seed, Inc.	767 S. 5th St.	Brawley	5/24/2022
2022	1920	Mining	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	3/1/2022
2022	4005	Mining	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	3/1/2022
2022	3513	Miscellaneous	Brawley Union High School	480 N. Imperial Avenue	Brawley	6/28/2022
2022	2479	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	2999	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	3001	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	3527	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	2657	Non-Retail SS	CalEnergy Operating Corporation	480 W. Sinclair Rd	Calipatria	8/2/2022
2022	2131	Non-Retail SS	Calipatria State Prison	7018 Blair Road	Calipatria	1/27/2022
2022	2513	Non-Retail SS	Imperial Irrigation District	5364 Hovely Rd.	Brawley	2/11/2022
2022	4641	Non-Retail SS	Kiewit	6140 Poe Rd.	Brawley	4/27/2022
2022	3829	Non-Retail SS	LA County Sanitation	6330 E. Highway 78	Brawley	3/1/2022
2022	4431	Non-Retail SS	Superior Cattle Feeders, LLC	551 S. Industrial Avenue	Calipatria	7/21/2022
2022	3585	Non-Retail SS	The Elmore Company	3104 W. Hwy. 86	Westmorland	7/22/2022
2022	2911	Non-Retail SS	U. S. Fish & Wildlife	906 West Sinclair Rd	Calipatria	12/8/2022
2022	2288	Paint Booth	Brawley Auto Body	1667 E. Main St	Brawley	6/24/2022
2022	2750	Paint Booth	Calipatria State Prison	D-Facility	Calipatria	12/6/2022

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Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2022	3525	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	3526	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	12/6/2022
2022	2296	Paint Booth	D & H Body Shop	575 Hwy 111	Brawley	3/7/2022
2022	4105	Paint Booth	Radco, Inc.	615A Old Hwy. 111	Brawley	3/1/2022
2022	535	Petro. Distrib.	Mann Company	1313 Main St.	Brawley	7/13/2022
2022	2907	Petro. Storage	City of Brawley	948 Ken Bemis Drive	Brawley	4/6/2022
2022	636	Petro. Storage	I. C. Public Works	4736 Hwy. 111	Brawley	11/10/2022
2022	1386	Power Generation	Imperial Irrigation District	4195 Dogwood Road, Unit 2	Brawley	3/14/2022
2022	3507	Power Generation	Imperial Irrigation District	402 Beal Road	Niland	3/14/2022
2022	1365	Power Generation	Imperial Irrigation District	4195 Dogwood Rd., Unit 1	Brawley	3/15/2022
2022	3138	Service Station	El Sol Market	110 Main Street	Westmorland	7/26/2022
2022	364	Service Station	MF. Esho, Inc.	610 S. Brawley Avenue	Brawley	8/15/2022
2022	4126	Service Station	Petromart Retail Group, Inc.	1691 E. Main Street	Brawley	2/25/2022
2022	423	Service Station	Petromart Retail Group, Inc. DBA	395 W. Main St.	Brawley	1/13/2022
2022	438	Service Station	Prime Fuel & Mini Mart	1686 Main Street	Brawley	5/2/2022
2022	2610	Service Station	Raynash Inc dba Fillco 1	977 Main Street	Brawley	7/5/2022
2022	4150	Service Station	RNPM Inc	1190 S. Brawley Avenue	Brawley	9/2/2022
2022	4539	Soil Remediation	ES Engineering Services, LLC	Various	Imperial County	8/4/2022
2022	4521	Soil Remediation	Moller Investment Group, Inc.	201 W. Main Street	Brawley	5/31/2022
2022	4522	Soil Remediation	Moller Investment Group, Inc.	104 W. Main Street	Brawley	5/31/2022
2022	2494	SS Cardlock	Double Eagle Scale & Fuel, Inc.	701 N. Sorensen	Brawley	6/16/2022
2022	2169	SS Cardlock	Mann Company	1313 E. Main St.	Brawley	5/13/2022
2022	2120	Waste Disposal	CalEnergy Operating Corporation	3301 W. Hwy. 86	Brawley	6/8/2022
2022	3073	Waste Disposal	I. C. Public Works	Hovley & Fredericks Rd.	Brawley	4/26/2022
2022	3078	Waste Disposal	I. C. Public Works	Cuff Rd., Approx. 3 Miles NE	Niland	4/28/2022
2022	3082	Waste Disposal	I. C. Public Works	Spa Road, Hot Spa	Niland	6/23/2022
2023	1174	Aggregate	I. C. Public Works	Various Locations	Imperial County	3/8/2023
2023	3273	Aggregate	I. C. Public Works	Various Locations	Imperial County	3/8/2023
2023	4638	Aggregate	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	1/10/2023
2023	3668	Beef Feedlot	Brandt Co., Inc.	7015 Brandt Road	Calipatria	12/1/2023
2023	3630	Beef Feedlot	Cameiro Heifer Ranch	195 W. Carey Road	Brawley	11/1/2023
2023	4437	Beef Feedlot	Cameiro Heifer Ranch	505 W. Keystone Road	Brawley	11/1/2023

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Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2023	3639	Beef Feedlot	Foster Feed Yard, Inc.	1350 East Keystone Road	Brawley	11/2/2023
2023	3640	Beef Feedlot	Foster Feed Yard, Inc.	3403 Casey Road	Brawley	11/2/2023
2023	2395	Beef Feedlot	Hein Hettinga	5004 Brandt	Brawley	10/19/2023
2023	3679	Beef Feedlot	Mesquite Cattle Feeders Inc.	1450 E. Shank Road	Brawley	11/12/2023
2023	3653	Beef Feedlot	Mesquite Cattle Feeders, Inc.	1504 E. Hwy. 78	Brawley	12/11/2023
2023	3645	Beef Feedlot	Moiola Bros. Cattle Feeders	1594 Gonder Road	Brawley	12/11/2023
2023	3682	Beef Feedlot	Moiola Bros. Cattle Feeders	3990 Holt Ave.	Brawley	12/11/2023
2023	3647	Beef Feedlot	Moiola Bros. Cattle Feeders LTD	2001 E. Keystone Road	Brawley	12/11/2023
2023	3658	Beef Feedlot	Superior Cattle Feeders, LLC	6050 Hwy. 111	Calipatria	11/15/2023
2023	3659	Beef Feedlot	Superior Cattle Feeders, LLC	649 E. Rutherford Road	Brawley	9/13/2023
2023	3660	Beef Feedlot	Superior Cattle Feeders, LLC	5455 Kershaw Road	Brawley	11/14/2023
2023	3661	Beef Feedlot	Superior Cattle Feeders, LLC	612 Simpson Road	Calipatria	9/28/2023
2023	3677	Beef Feedlot	Superior Cattle Feeders, LLC	801 E. Rutherford Road	Brawley	9/13/2023
2023	3678	Beef Feedlot	Superior Cattle Feeders, LLC	352 E. Shank Road	Brawley	11/14/2023
2023	4572	Beef Feedlot	Superior Cattle Feeders, LLC	S. Weist Lake, Moorhead Canal 207	Brawley	9/28/2023
2023	3280	Combustion	Brawley Fire Department	815 Main Street	Brawley	1/31/2023
2023	4409	Combustion	CalEnergy Operating Corporation	Various- CalEnergy Facilities	Calipatria	12/12/2023
2023	4410	Combustion	CalEnergy Operating Corporation	Various- CalEnergy Facilities	Calipatria	12/12/2023
2023	4428	Combustion	CalEnergy Operating Corporation	CalEnergy Facilities	Calipatria	12/12/2023
2023	4429	Combustion	CalEnergy Operating Corporation	CalEnergy Facilities	Calipatria	12/12/2023
2023	4430	Combustion	CalEnergy Operating Corporation	Various- Leathers Facilities	Calipatria	12/12/2023
2023	4445	Combustion	CalEnergy Operating Corporation	Various- CalEnergy	Calipatria	12/12/2023
2023	4520	Combustion	CalEnergy Operating Corporation	CalEnergy Operating Corporation	Calipatria	12/12/2023
2023	2130	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	10/18/2023
2023	2139	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	10/18/2023
2023	2996	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	11/12/2023
2023	2998	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	11/12/2023
2023	4274	Combustion	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023
2023	3339	Combustion	Cellco Partnership dba Verizon Wireless	402-A East Beal Road	Niland	7/18/2023
2023	3752	Combustion	Cellco Partnership dba Verizon Wireless	Ogilby Road & Hwy. 8	Imperial County	6/15/2023
2023	2529	Combustion	City of Brawley	5015 Best Road	Brawley	2/16/2023
2023	2536	Combustion	City of Brawley	760 Willard Avenue	Brawley	2/16/2023

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Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2023	2537	Combustion	City of Brawley	1515 Jones Street	Brawley	2/16/2023
2023	3695	Combustion	City of Brawley	Legion Rd. & Dogwood Rd.	Brawley	2/26/2023
2023	4198	Combustion	City of Brawley	1505 Jones Street	Brawley	1/31/2023
2023	4380	Combustion	City of Brawley	S. 9th Street	Brawley	2/16/2023
2023	3814	Combustion	City of Brawley Police Dept.	351 Main Street	Brawley	5/23/2023
2023	2526	Combustion	City of Westmorland	5305 Martin Rd.	Westmorland	3/13/2023
2023	3098	Combustion	City of Westmorland	200 West 1st St.	Westmorland	3/13/2023
2023	2874	Combustion	Golden State Water Company	621 S. Soresen Avenue	Calipatria	1/10/2023
2023	4260	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	2/15/2023
2023	4261	Combustion	Grimmway Enterprises, Inc.	2171 W. Bannister Rd.	Westmorland	2/15/2023
2023	4233	Combustion	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	4/18/2023
2023	2593	Combustion	Imperial Irrigation District	904 N. Dogwood Rd.	Brawley	7/24/2023
2023	2866	Combustion	Imperial Irrigation District	5364 Hovley Rd.	Westmorland	5/18/2023
2023	3299	Combustion	Imperial Irrigation District	Black Mountain	Imperial County	5/9/2023
2023	3300	Combustion	Imperial Irrigation District	Brawley Microwave Site	Brawley	5/9/2023
2023	3301	Combustion	Imperial Irrigation District	Niland Microwave Site	Niland	5/11/2023
2023	3303	Combustion	Imperial Irrigation District	Pilot Knob Site	Imperial County	5/11/2023
2023	3490	Combustion	Imperial Irrigation District	Midway Substation	Calipatria	5/3/2023
2023	4545	Combustion	Imperial Irrigation District	Various Locations	Imperial County	8/8/2023
2023	3609	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	1698 I Street	Brawley	12/12/2023
2023	3610	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	4560 Green Road	Brawley	12/12/2023
2023	3953	Combustion	Imperial Valley Emergency Communications Authority (IVECA)	Black Mountain	Imperial County	10/3/2023
2023	3805	Combustion	LA County Sanitation	6502 E. Highway 78	Brawley	1/23/2023
2023	2669	Combustion	MCI Worldcom	Hwy. 111 & Gillespie Road	Niland	4/26/2023
2023	2883	Combustion	MCI Worldcom	Ogilby Road	Imperial County	4/26/2023
2023	2806	Combustion	Niland County Sanitation District	125 W. Alcott Rd	Niland	5/8/2023
2023	4644	Combustion	Niland Public Safety Facility/Fire STA. 7	8071 Luxor Avenue	Niland	5/8/2023
2023	642	Combustion	Pioneers Memorial Healthcare District	207 W. Legion Road	Brawley	2/8/2023
2023	3878	Combustion	Pioneers Memorial Hospital	205 W. Legion Rd.	Brawley	2/8/2023
2023	2954	Combustion	Qwest Communications Corp.	1769 Nider Rd.	Niland	8/29/2023
2023	2988	Combustion	Qwest Communications Corp.	526 East D Street	Brawley	8/29/2023
2023	4434	Combustion	Rockwood Ag Services, Inc.	47 Rutherford Rd.	Brawley	5/16/2023

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Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2023	3097	Combustion	Superior Cattle Feeders, LLC	551 S. Industrial Ave.	Calipatria	5/15/2023
2023	3866	Combustion	Three Flags Citrus, LLC	4300 Hwy 86	Brawley	7/24/2023
2023	4672	Combustion	Trusource, LLC	195 W. Carey Rd.	Brawley	5/31/2023
2023	4169	Combustion	U.S. Border Patrol El Centro	Hwy. 86 & Hwy. 78	Imperial County	8/9/2023
2023	4184	Combustion	U.S. Border Patrol, El Centro Sector	Marina Rd. & Hwy. 111	Niland	8/9/2023
2023	4375	Combustion	Viridos	250 W. Schrimpf Rd.	Calipatria	2/9/2023
2023	4006	Combustion	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	1/10/2023
2023	4578	Combustion	Western Mesquite Mines, Inc.	6502 E. Hwy. 78	Brawley	1/10/2023
2023	4405	Combustion	Wm. Bolthouse Farms, Inc.	5337 Lack Rd. & Hwy. 86	Westmorland	2/15/2023
2023	4612	Compost	Brandt Co., Inc.	7015 Brandt Road	Calipatria	6/1/2023
2023	4586	Compost	Bull Holdings Corp.	1590 East Gonder Rd.	Brawley	6/2/2023
2023	4264	Compost	Imperial Valley Compost LLC	1408 East Highway 78	Brawley	5/9/2023
2023	4265	Compost	Imperial Valley Compost LLC	3403 Casey Road	Brawley	5/9/2023
2023	4335	Compost	Spreadco, Inc.	1450 Shank Road	Brawley	6/1/2023
2023	2026	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	2/8/2023
2023	2098	Concrete	Gibson & Schaefer, Inc.	304 E. Shank Road	Brawley	2/8/2023
2023	3590	Concrete	Gibson & Schaefer, Inc.	Various Locations	Imperial County	11/30/2023
2023	1890	Geothermal	CalEnergy Operating Corporation	JJ Elmore - 786 W. Sinclair Road	Calipatria	5/3/2023
2023	1891	Geothermal	CalEnergy Operating Corporation	Vulcan - 7001 Gentry Road	Calipatria	5/3/2023
2023	1927	Geothermal	CalEnergy Operating Corporation	Leathers - 342 W. Sinclair Road	Calipatria	5/3/2023
2023	2000	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	5/2/2023
2023	4446	Geothermal	CalEnergy Operating Corporation	Various Locations - CalEnergy Facilities	Calipatria	12/12/2023
2023	4496	Geothermal	CalEnergy Operating Corporation	CalEnergy Region 1	Calipatria	12/13/2023
2023	4527	Geothermal	CalEnergy Operating Corporation	7001 Gentry Road	Calipatria	12/13/2023
2023	4546	Geothermal	CalEnergy Operating Corporation	CalEnergy Region 2 Power Plant	Calipatria	12/13/2023
2023	4555	Geothermal	CalEnergy Operating Corporation	324 W. Sinclair Rd.	Calipatria	12/13/2023
2023	4587	Geothermal	CalEnergy Operating Corporation	6229 Crummer Road	Calipatria	12/13/2023
2023	3734	Geothermal	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	4/28/2023
2023	3979	Geothermal	Hudson Ranch Power I, LLC	Southwest of Niland, Section 13, T11S, R13E	Niland	4/18/2023
2023	4216	Geothermal	Hudson Ranch Power I, LLC	409 W. McDonald Road	Calipatria	4/18/2023
2023	2472	Hay Compressing	Border Valley Trading, LTD	604 E. Mead Road	Brawley	12/4/2023
2023	2530	Hay Compressing	Golden Eagle Hay Company Inc.	640 Railroad Ave.	Calipatria	5/15/2023

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2023	4090	Hay Compressing	Planters Hay Inc.	1295 Highway 78	Brawley	3/27/2023
2023	4404	Hay Compressing	United Hay Press, Inc	1853 W. Frontage Road A	Brawley	3/12/2023
2023	1506	Incinerator	Frye Chapel & Mortuary	799 Brawley Avenue	Brawley	8/3/2023
2023	2454	Incinerator	U.S. Fish & Wildlife	906 W. Sinclair Rd.	Calipatria	8/3/2023
2023	3952	Manufacturing	Helena Agri-Enterprises, LLC	600 S. Brown Ave.	Calipatria	3/14/2023
2023	3068	Manufacturing	K. W. Kuhlen Hay Milling	5300 Kalin Rd.	Brawley	2/14/2023
2023	3089	Manufacturing	OWB Packers, LLC	57 E. Shank Road	Brawley	1/25/2023
2023	1550	Manufacturing	Wingate Company	Dogwood/Keystone	Brawley	2/2/2023
2023	3352	Milling	All American Grain Company	6050 Hwy. 111	Calipatria	5/15/2023
2023	2520	Milling	K-F Seeds	4307 Fifield Road	Brawley	10/31/2023
2023	2401	Milling	Rubin Seeds, Inc.	4746 Hwy. 111	Brawley	6/8/2023
2023	3379	Milling	Shank Seed LLC	3900 McConnell Rd.	Brawley	4/27/2023
2023	390	Milling	Top Notch Seed, Inc.	767 S. 5th Street	Brawley	6/22/2023
2023	1920	Mining	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	1/10/2023
2023	4005	Mining	Western Mesquite Mines, Inc.	6502 East Hwy. 78	Brawley	1/10/2023
2023	3513	Miscellaneous	Brawley Union High School	480 N. Imperial Avenue	Brawley	5/23/2023
2023	2479	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023
2023	2999	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023
2023	3001	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023
2023	3527	Miscellaneous	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023
2023	2657	Non-Retail SS	CalEnergy Operating Corporation	480 W. Sinclair Rd	Calipatria	8/8/2023
2023	2131	Non-Retail SS	Calipatria State Prison	7018 Blair Road	Calipatria	1/10/2023
2023	2513	Non-Retail SS	Imperial Irrigation District	5364 Hovely Rd.	Brawley	2/10/2023
2023	4641	Non-Retail SS	Kiewit	6140 Poe Rd.	Brawley	4/12/2023
2023	3829	Non-Retail SS	LA County Sanitation	6330 E. Highway 78	Brawley	1/23/2023
2023	4431	Non-Retail SS	Superior Cattle Feeders, LLC	551 S. Industrial Avenue	Calipatria	7/21/2023
2023	3585	Non-Retail SS	The Elmore Company	3104 W. Hwy. 86	Westmorland	7/20/2023
2023	2911	Non-Retail SS	U.S. Fish & Wildlife	906 West Sinclair Rd	Calipatria	12/9/2023
2023	2288	Paint Booth	Brawley Auto Body	1667 E. Main St	Brawley	1/30/2023
2023	2750	Paint Booth	Calipatria State Prison	7018 Blair Rd.	Calipatria	10/12/2023
2023	3525	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023
2023	3526	Paint Booth	Calipatria State Prison	7018 Blair Road	Calipatria	10/12/2023

Table F-2a. ICAPCD Inspections of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2023	2296	Paint Booth	OWB Packers, LLC	575 Hwy 111	Brawley	6/28/2023
2023	4666	Paint Booth	El Centro Motors	811 S. Brawley Avenue	Brawley	5/16/2023
2023	4105	Paint Booth	Radco, Inc.	615A Old Hwy. 111	Brawley	2/14/2023
2023	535	Petro. Distrib.	Mann Company	1313 Main St.	Brawley	7/20/2023
2023	2907	Petro. Storage	City of Brawley	948 Ken Bemis Drive	Brawley	4/3/2023
2023	636	Petro. Storage	I. C. Public Works	4736 Hwy. 111	Brawley	11/8/2023
2023	1365	Power Generation	Imperial Irrigation District	4195 Dogwood Rd., Unit 1	Brawley	3/7/2023
2023	1386	Power Generation	Imperial Irrigation District	4195 Dogwood Road, Unit 2	Brawley	3/7/2023
2023	3507	Power Generation	Niland Turbine Plant	402 Beal Road	Niland	3/7/2023
2023	4126	Service Station	Brawley Fuel and Food #2	1691 E. Main Street	Brawley	2/25/2023
2023	3138	Service Station	El Sol Market	110 Main Street	Westmorland	7/25/2023
2023	2573	Service Station	Matthew D Venture Inc	300 West Main St.	Westmorland	7/26/2023
2023	364	Service Station	MF. Esho, Inc.	610 S. Brawley Avenue	Brawley	8/31/2023
2023	423	Service Station	Petromart Retail Group, Inc. dba Brawley Fuel and Food	395 W. Main St.	Brawley	1/4/2023
2023	438	Service Station	Prime Fuel & Mini Mart	1686 Main Street	Brawley	5/1/2023
2023	2610	Service Station	Raynash, Inc. dba Fillco 1	977 Main Street	Brawley	7/6/2023
2023	4150	Service Station	RNPM Inc.	1190 S. Brawley Ave.	Brawley	9/5/2023
2023	4521	Soil Remediation	Moller Investment Group, Inc.	201 W. Main Street	Brawley	4/12/2023
2023	4522	Soil Remediation	Moller Investment Group, Inc.	104 W. Main Street	Brawley	4/12/2023
2023	2494	SS Cardlock	Double Eagle Scale & Fuel, Inc.	701 N. Sorensen Ave.	Calipatria	12/27/2023
2023	2169	SS Cardlock	Mann Company	1313 E. Main St.	Brawley	7/20/2023
2023	2120	Waste Disposal	CalEnergy Operating Corporation	3301 W. Hwy. 86	Brawley	4/6/2023
2023	3073	Waste Disposal	I. C. Public Works	Hovley & Fredericks Rd.	Brawley	5/16/2023
2023	3078	Waste Disposal	I. C. Public Works	Cuff Rd., Approx. 3 Miles NE	Niland	4/28/2023
2023	3082	Waste Disposal	I. C. Public Works	Spa Road, Hot Spa	Niland	8/25/2023

Notes:

1. This table presents all inspections that occurred from 2021 to 2023 for permitted sources at facilities located in the North End Phase 1 Community, i.e., those within the cities of Brawley, Calipatria, Niland, and Westmorland.

Abbreviations:

ATC - Authority to Construct

PTO - Permit to Operate

SS - Stationary Source

Table F-2b. ICAPCD Inspection Rate of Facilities within the North End Phase 1 Community, 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	Total Permits	Total Inspections	Percent Inspected
2021	155	138	89%
2022	160	160	100%
2023	159	159	100%

Notes:

1. ICAPCD inspection rate is calculated as the fraction of total number of permits with related inspections that occurred in a given year (as listed in Table F-2a) out of the total number of permits (as listed in Table F-1a) that were active during that year. This includes facilities located within Brawley, Calipatria, Niland, and Westmorland.

Table F-3a. ICAPCD Complaints within the North End Phase 1 Community 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	Date	Complaint #	Complaint Type	Location/Description of Complaint	NOV #	NTC #	Warning (X)	Nothing Found (X)
2021	1/7/2021	7492	Dust	4151 CA-86, Brawley, CA 92227			X	
2021	2/12/2021	7501	Dust	110 W Main St, Westmorland, CA 92281	6784	2797	X	
2021	2/25/2021	7505	Odor	57 Shank Rd, Brawley, CA 92227				X
2021	3/1/2021	7507	Smoke/Open fire	4552 Kalin Rd, Brawley, CA 92227				X
2021	3/24/2021	7514	Dust	110 W Main St, Westmorland, CA 92281			X	
2021	3/31/2021	7519	Open fire/AG related	English/Gillespie Rd, Niland, California, 92257				
2021	5/20/2021	7531	Dust	650 N Cesar Chavez Street, Brawley, CA 92227			X	
2021	5/20/2021	7532	Dust	110 W Main St, Westmorland, CA 92281			X	
2021	5/27/2021	7534	Dust	110 W Main St, Westmorland, CA 92281			X	
2021	6/8/2021	7537	Dust	500 Main St, Brawley, CA 92227				X
2021	6/21/2021	7540	Dust	660 N Cesar Chavez St, Brawley, CA 92227			X	
2021	9/15/2021	7555	Open fire	Hwy 111 & English Rd., Niland, CA				
2021	9/23/2021	7558	Smoke	Corner of Eddins Rd and Sperry Rd. Calipatria, CA				
2021	9/27/2021	7559	Dust	Crossroads of W Magnolia St & W B St, Brawley, California, 92227			X	
2021	10/11/2021	7564	Dust	Crossroads of W Magnolia St & W B St, Brawley, California, 92228				
2021	10/21/2021	7567	Smoke	Crossroads of English Rd & Eddins Rd, Calipatria, California, 92233				X
2021	12/10/2021	7593	Odor	57 Shank Rd, Brawley, CA 92227				X
2021	12/14/2021	7594	Dust	214 W G St, Brawley, CA 92227			X	
2021	12/8/2021	7591	Dust	110 W Main St, Westmorland, CA 92281	6927			
2021	12/22/2021	7599	Smoke	4502 Casey Rd, Brawley, CA 92227	6895			
2021	12/20/2021	7598	Dust	110 W Main St, Westmorland, CA 92281				X
2022	1/20/2022	7608	Odor	57 Shank Rd, Brawley, CA 92227	6961			
2022	1/21/2022	7609	Open fire/Odor	6495 Sperry Rd, Calipatria, CA 92233				X
2022	1/21/2022	7610	Odor	57 Shank Rd, Brawley, CA 92227	6961			
2022	1/21/2022	7611	Odor	57 Shank Rd, Brawley, CA 92227	6961			
2022	1/21/2022	7612	Odor	57 Shank Rd, Brawley, CA 92227	6961			
2022	1/28/2022	7617	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	2/2/2022	7621	Odor	57 Shank Rd, Brawley, CA 92227				
2022	2/9/2022	7627	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	2/24/2022	7636	Other	159 S. Brawley Ave. Brawley, CA				X
2022	3/8/2022	7644	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	3/10/2022	7646	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	3/21/2022	7650	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	3/13/2022	7647	Smoke	Eddins Rd & English Rd, Calipatria, California, 92233	6972			

Table F-3a. ICAPCD Complaints within the North End Phase 1 Community 2021-2023

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Year	Date	Complaint #	Complaint Type	Location/Description of Complaint	NOV #	NTC #	Warning (X)	Nothing Found (X)
2022	3/22/2022	7653	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	3/22/2022	7654	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	4/5/2022	7667	Open fire	Corner of E Beal Rd & Cuff Rd, Niland, California, 92257				X
2022	4/21/2022	7671	Dust	Intersection of Cesar Chavez St & Malan St, Brawley, California, 92227			X	
2022	6/8/2022	7691	Dust	695 S Adams St, Brawley, California, 92227				X
2022	10/18/2022	7711	Odor	57 Shank Rd, Brawley, CA 92227		3179		
2022	10/24/2022	7716	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	10/27/2022	7717	Odor	57 Shank Rd, Brawley, CA 92227				X
2022	11/12/2022	7724	Open fire/AG related	Crossroads of Wiest Rd & McDonald Rd, Calipatria, California, 92233	7181			
2023	1/23/2023	7736	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	1/21/2023	7735	Open fire	Schwartz Rd & McConnell Rd, Brawley, California, 92227	7194			
2023	2/7/2023	7739	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	2/9/2023	7741	Odor	57 Shank Rd, Brawley, CA 92227				
2023	3/13/2023	7748	Odor	1333 Jones St, Brawley, California, 92227				X
2023	4/10/2023	7753	Dust	6050 CA-111, Calipatria, CA 92233				X
2023	3/27/2023	7751	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	4/26/2023	7757	Odor	1695 A St, Brawley, California, 92227				X
2023	5/16/2023	7763	Other	Alcott Rd & Davis Rd, Niland, California, 92257				
2023	5/23/2023	7765	Odor	945 N Eastern Ave, Brawley, California, 92227			X	
2023	7/18/2023	7778	Asbestos issue	135 B St, Brawley, California, 92227				
2023	4/19/2023	7754	Smoke	Howenstein Rd & North H St, Westmorland, California, 92281	7170			
2023	7/27/2023	7779	Smoke	385 W Jones St, Brawley, California, 92227				
2023	9/13/2023	7788	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	10/4/2023	7793	Odor	207 W Legion Rd, Brawley, CA 92227				X
2023	10/30/2023	7800	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	11/13/2023	7808	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	11/2/2023	7804	Odor	CA-111 & CA-115, Calipatria, California, 92233				
2023	11/21/2023	7811	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	12/18/2023	7824	Odor	57 Shank Rd, Brawley, CA 92227				X
2023	12/13/2023	7820	Smoke	Seybert Rd, Brawley, California, 92227				
2023	12/28/2023	7830	Odor	57 Shank Rd, Brawley, CA 92227				X

Notes:

1. This list includes all complaints received regarding permitted sources at facilities located within Brawley, Calipatria, Niland, and Westmorland.
2. "Nothing Found" indicates that a complaint did not result in a finding that warranted action such as an NOV or NTC.

Table F-3.b. North End Phase 1 Community Complaint Types
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

	Number of Complaints				
Complaint Type	**2021**	**2022**	**2023**	**Total**	**Percent of Total Complaints (2021-2023)**
ASBESTOS ISSUE	0	0	1	1	2%
DUST	13	2	1	16	25%
ODOR	2	15	15	32	49%
OPEN FIRE	1	1	1	3	5%
OPEN FIRE/AG RELATED	1	1	0	2	3%
OPEN FIRE/ODOR	0	1	0	1	2%
OTHER	0	1	1	2	3%
SMOKE	3	1	3	7	11%
SMOKE/OPEN FIRE	1	0	0	1	2%
Grand Total	**21**	**22**	**22**	**65**	**100%**

Notes:

1. Complaints listed in Table F-3a are classified by complaint type by ICAPCD. The table above totals the number of complaints in Table F-3a in each category for sources within the North End Phase 1 Community from 2021 to 2023.

Table F-4a. NOVs and NTCs Issued within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2021	6832		Brawley	COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT (2020) CONTAINING THE GASOLINE THROUGHPUT. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	6/7/2021	Annual Report
2021	6425		Brawley	ICAPCD RULE 421 - OPEN BURNING	NO PERSON SHALL USE OPEN OUTDOOR FIRES FOR THE PURPOSE OF DISPOSAL OR BURNING OF PETROLEUM WASTES, DEMOLITION DEBRIS, TIRES, TAR, TREES, WOOD WASTE, TRASH OR OTHER COMBUSTIBLE OR FLAMMABLE SOLID OR LIQUID WASTE.	1/11/2021	Open Burn
2021		2797	Westmorland	CA HEALTH AND SAFETY CODE SECTIONS	CLOSE PARKING LOT TILL ALL DUST ISSUES ARE TAKING CARE OF. THE PARKING LOT MUST REMAIN CLOSED TILL APCD STAFF CAN RE INSPECT THE LOT. THE LOT MUST BE IN COMPLIANCE TO BE REOPENED FOR PARKING.	2/12/2021	Dust/Opacity
2021	6757		Westmorland	RULE 201.B PERMITS REQUIRED	EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT.	7/20/2021	Permit
2021		2858	Brawley	NA	PERFORM A PRESSURE DECAY TEST REQUIRED BY PERMIT TO OPERATE CONDITIONS LAST PRESSURE DECAY TEST WAS 12-10-20.	3/23/2021	Service Station
2021		2948	Calipatria	COND NO. C.4	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING A TOTAL QUANTITY AND TYPE OF EACH ORGANIC WASTE MATERIAL RECEIVED AND OR GENERATED ON SITE B. TOTAL QUANITITY OF ACTIVE PHASE COMPOSTING PILES C. WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/24/2021	Annual Report
2021		2997	Calipatria	COND. NO. 13	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY HOURS OF OPERATION FOR EACH UNIT. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/27/2021	Annual Report
2021		2958	Calipatria	COND. NO. 20	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNITS. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2959	Calipatria	COND. NO. 18	SUBMIT TO THE ICAPCD THE ANNUAL REPORT CONTAINING THE GASOLINE THORUGHPUT FOR 2020. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2960	Calipatria	COND. NO. 15	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNITS. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2961	Calipatria	COND. NO. 7	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE ABRASIVES USED DURING THE YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2021		2962	Calipatria	COND. NO. 9	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE PAINT SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2962	Calipatria	COND. NO. 9	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE PAINT SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2963	Calipatria	COND. NO. 18	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNITS. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2964	Calipatria	COND. NO. 15	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNITS. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2965	Calipatria	COND. NO. 8	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE PAINT SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2966	Calipatria	COND. NO. 8	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE PAINT SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2967	Calipatria	COND. NO. 14	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSPUTION AND HOURS OPERATED PER MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNIT. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021		2994	Brawley	COND. NO. 16	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE HOURS OF OPERATION AND FUEL CONSPUTION PER DAY FOR MAINTENANCE, TESTING AND EMERGENCY USE; AND ON A SEPARATE SECTION, THE HOURS OF OPERATION AND FUEL CONSUPTION PER MONTH. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/27/2021	Annual Report
2021		2949	Brawley	COND. NO. 1	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY PAINT, SOLVENT AND THINNERS CONSUPTION REPORT, INCICATING THE BRAND OF THE PRODUCT USED. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/24/2021	Annual Report
2021		3001	Brawley	COND. 14	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNIT. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2021		3000	Brawley	COND. NO. 15	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR EMERGENCY USE FOR THE UNIT. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	5/25/2021	Annual Report
2021	6858		Westmorland	COND. NO. 16	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT (2020) CONTAINING THE GASOLINE THROUGHPUT. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFICE NO LATER THAN FEBRUARY 28TH.	6/7/2021	Annual Report
2021	6756		Westmorland	RULE 201.B PERMITS REQUIRED	EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT.	7/20/2021	Permit
2021	5928		Westmorland	COND. NO. 7 & 18	ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT. PERMITEE SHALL PERFORM MONTHLY LIQUID AND VAPOR LEAK INSPECTION. PERMITTEE SHALL PERFORM MONTHLY LIQUID AND VAPOR LEAK INSPECTIONS DURING PRODUCT TRANSFER OPERATION.	7/12/2021	Service Station
2021	6823		Brawley	COND. NO. 15	PERMITTEE SHAL SUBMIT TO THE APCD AN ANNUAL REPORT (2020) CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR REGULAR USE FOR THE UNIT. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY.	6/2/2021	Annual Report
2021	6881		Niland	COND. NO. 14	NOTWITHSTANDING ANY OTHER PROVISION OF SECTION D, IF A PERSON FAILS TO COMPLY WITH A NOTICE TO COMLY WITHIN THE PERESCRIBED PERIOD OR IF THE APCO DETERMINES THAT THE CIRCUMSTANCES SURROUNDING A PARTICULAR MINOR VIOLATION ARE SUCH THAT IMMEDIATE ENFORCEMENT.	7/2/2021	Stationary Source
2021	6848		Brawley	COND. NO. 16	PERMITTEE SHAL SUBMIT TO THE APCD AN ANNUAL REPORT (2020) CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR REGULAR USE FOR THE UNIT. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY.	6/2/2021	Annual Report
2021		3031	Brawley	COND. NO. D.2	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTIANING THE MONTHLY PRODUCTION TONNAGE OF COMPRESSED HAY. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/1/2021	Annual Report
2021		1916	Calipatria	COND. NO. 19	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/7/2021	Annual Report
2021		2979	Brawley	COND. NO. 11	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINING THE MONTHLY PRODUCTION TONNAGE. THE REPORT SHALL REACH THE APCD WITHIN 14 DAYS OF THIS LETTER.	6/1/2021	Annual Report
2021		1905	Westmorland	COND. NO. 18	SUBMIT TO THE ICAPCD THE ANNUAL REPORT CONTAINING THE GASOLINE THROUGHPUT FOR 2020. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/7/2021	Annual Report

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2021		1917	Brawley	COND. NO. E.2&4	PERMITTEE SHALL SUBMIT TO THE APCD THE 2020 ANNUAL REPORT CONTAINING THE MONTHYLY HAY COMPRSSED AND THE TOTAL ANNUAL HAY COMPRESSED. 4) PERMITTEE SHALL SUBMIT TO THE ICAPCD THE 2020 ANNUAL REPORT CONTAINING THE DAILY HOURS OF OPERATION AND THE TOTAL MONTHLY AND ANNUAL HOURS OF OPERATION FOR THE GENERATOR.	6/7/2021	Annual Report
2021		3032	Brawley	COND. NO. E-3	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTAINTING THE FOLLOWING: THE MONTHLY QUANTITY OF WHEAT GRAIN RECEIVED IN TONS, THE MONTHLY QUANTITY OF WHEAT GRAIN LOADED OUT IN TONS, MONTHLY QUANTITY OF SEED RECEIVED IN TONS, MONTHLY QUANTITY OF SEED LOADED OUT IN TONS, THE MONTHLY FUEL CONSUPTION FOR EACH LISTED BELT LOADER, MONTHLY HOURS OF OPERATION FOR EACH LISTED BELT LOADER.	6/1/2021	Annual Report
2021		2986	Calipatria	COND. NO. 19 A & B	SUBMIT TO THE ICAPCD THE 2020 ANNAUAL REPORT CONTAINING THE TOTAL MONTHLY THROUGHPUT OF METHANOL AND TOTAL MONTHLY AND ANNUAL THROUGHPUT OF DME PRODUCE. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/1/2021	Annual Report
2021		3029	Niland	COND. NO. 17	SUBMIT TO THE ICAPCD THE ANNUAL REPORT CONTAINING THE GASOLINE THROUGHPUT FOR 2020. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/1/2021	Annual Report
2021		2989	Brawley	COND. NO. 19	SUBMIT TO THE ICAPCD THE ANNUAL REPORT CONTAINING THE GASOLINE THROUGHPUT FOR 2020. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/1/2021	Annual Report
2021		2975	Brawley	COND. NO. 12	SUBMIT TO THE ICAPCD THE ANNUAL REPORT FOR 2020 CONTIANING THE MONTHLY PRODUCTION TONNAGE OF GRAINS AND SEEDS PROCESSED PER MONTH AND DURING THE YEAR. THE REPORTS SHALL REACH THE APCD WITHIN 14 DAYS OF RECEIPT OF THIS LETTER.	6/1/2021	Annual Report
2021	6875		Brawley	RULE 201.B PERMITS REQUIRED	EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT. A SINGLE PERMIT TO OPERATE MAY BE ISSUED FOR ALL COMPONENTS OF AN INTEGRATED SYSTEM OR PROCESS.	7/13/2021	Permit
2021	6902		Brawley	COND. NO. 16	THE PERMITTEE SHALL SUBMIT ALL TEST RESULTS FOR THE INITIAL PERFORMANCE TESTS REQUIRED PURSUANT TO CONDITIONS 12, 13, AND 14 WITHIN TWENTY (20) DAYS OF START-UP.	9/30/2021	Paperwork
2021	6844		Brawley	COND. NO. 15	PERMITTEE SHAL SUBMIT TO THE APCD AN ANNUAL REPORT (2020) CONTAINING THE MONTHLY FUEL CONSUPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND OR REGULAR USE FOR THE UNIT. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY.	6/3/2021	Annual Report

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2021	6854		Brawley	COND. NO. D.8	THE PERMITTE SHALL CARRY OUT A SOURCE TEST OF THE LISTED GENERATOR WITHIN 12 MONTHS OF INSTALLATION AND ONCE EVERY 36 MONTHS AFTER THE INITIAL SOURCE TEST. THE FREQUENCY OF COMPLIANCE TESTING MAY BE EXTENDED TO NOT LESS THAN EVERY 60 MONTHS FOR EACH LISTED GENERATOR IF THE PERMITTEE USES A PORTABLE NOX ANALYZER TO TAKE NOX READINGS TO VERIFY.	9/20/2021	Stationary Source
2021	6840		Brawley	COND. NO. 14	PERMITTEE SHAL SUBMIT TO THE IMPERIAL COUNTY APCD AN ANNUAL REPORT (2020) CONTAINING THE DAILY HOURS OF OPERATION AND FUEL CONSUMPTION PER DAY FOR MAINTENANCE, TESTING AND EMERGENCY USE; AND ON A SEPARATE SECTION, THE HOURS OF OPERATION AND FUEL CONSUMPTION PER MONTH. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	6/7/2021	Annual Report
2021	6946		Calipatria	RULE 201	NOTWITHSTANDING ANY OTHER PROVISION OF SECTION D, IF A PERSON FAILS TO COMPLY WITH A NOTICE TO COMLY WITHIN THE PERESCRIBED PERIOD OR IF THE APCO DETERMINES THAT THE CIRCUMSTANCES SURROUNDING A PARTICULAR MINOR VIOLATION ARE SUCH THAT IMMEDIATE ENFORCEMENT IS WARRANTED TO PREVENT HARM TO THE PUBLIC HEALTH OR SAFETY OF OR TO THE ENVIRONMENT, THE APCDO MAY TAKE ANY NEEDED ENFORCEMENT ACTION AUTHORIZED BY LAW.	9/20/2021	Stationary Source
2021		3067	Brawley	NA	MAINTAIN CYCLONES AND OTHER EQUIPMENT IN GOOD OPERATING CONDITION AND SHALL BE OPERATED IN A MANNER TO MINIMIZE EMISSIONS OR AIR CONTAMINANTS INTO THE ATMOSPHERE.	9/1/2021	Stationary Source
2021		3071	Brawley	NA	SUBMIT AN ATC APPLICATION WITH ICAPCD THE ATC IS TO UPDATE THE EQUIPMENT LIST WITH THE CHARF HUNTERWOOD PRESS , NB3 DOUBLE PRESS AND ANY EQUIPMENT RE-MOVED FROM OPERATIONS.	9/17/2021	Permit
2021		3070	Brawley	NA	CREATE A DAILY LOG SHOWING TONNAGE COMPRESSED (NOT ONLY HAY WEIGHED ON SCALES OUTBOUND) TO COMPLY WITH PERMIT CONDITION .	9/17/2021	Paperwork
2022		3054	Calipatria	NA	FOLLOW LCAF REQUIREMENTS REGARDING REMOVAL OF MANURE/COMPOST OUTSIDE OF PENS. MANURE MUST BE REMOVED FROM SITE AFTER 72 HOURS OF REMOVAL.	11/18/2022	Unknown
2021		3055	Brawley	NOT PROVIDED	EXTEND AEROL SPRAY SURROUNDING THE ANEREOBIC POOL TO THE SOUTHEAST CORNER NEAR STATION #6.	11/24/2021	Unknown
2021	6925		Calipatria	COND. NO. 15 B.1.	THE PERFORMANCE TESTS REQUIRED PURSUANT TO CONDITIONS NO. 11 AND 12 SHALL BE SUCCESSFULLY CONDUCTED AT LEAST ONCE IN EACH TWELVE (12) MONTH PERIOD AFTER THE DATE OF SUCCESSFUL COMPLETION OF THE STARTUP PERFORMANCE TESTING. TEST RESULTS SHALL BE SUBMITTED TO THE AIR DISTRICT WITHIN TWENTY (20) DAYS OF CONDUCTING THESE ANNUAL TESTS.	12/8/2021	Service Station

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2021	6938		Calipatria	COND. NO. 18	THE IN-STATION DIAGNOSTICS SYSTEM (ISD) SHALL BE KEPT IN ACTIVE OPERATING MODE AT ALL TIMES AS SPECIFIED IN OPERATIONAL AND MAINTENANCE MANUALS. PRINTED ISD MONTHLY REPORT RECORDS, OF THE MOST RECENT CONSECUTIVE TWELVE MONTH PERIOD, SHALL BE KEPT ON THE PREMISES AND MADE AVAILABLE TO THE AIR DISTRICT UPON REQUEST.	12/22/2021	Service Station
2021		3056	Calipatria	NA	SCHEDULE REPAIRS FOR ISD SYSTEM WITH TESTING COMPANY. ADDITIONALLY, SCHEDULE THE ANNUAL TESTING FOR COMPLIANCE.	12/15/2021	Service Station
2021		3061	Calipatria	NA	CONDUCT A PHASE II VAPOR RECOVERY TEST (FULL PHASE II) AND A PRESSURE DECAY BY THE DUE DATE.	12/3/2021	Service Station
2021		3083	Calipatria	NA	SUBMIT A PERMIT APPLICATION WITH ICAPCD'S PERMITTING DEPARTMENT TO UPDATE THE HEADCOUNT CAPACITY (AND EMISSION CAPACITY) OF THIS FACILITY.	12/15/2021	Permit
2022		3084	Calipatria	NA	SUBMIT A PERMIT APPLICATION WITH ICAPCD'S PERMITTING DEPARTMENT TO UPDATE THE HEADCOUNT CAPACITY (AND EMISSION CAPACITY) AT THIS FACILITY.	12/15/2022	Permit
2022	6927		Westmorland	ICAPCD RULE 401; ICAPCD RULE 804	401: NO PERSON SHALL RELEASE OR DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSION WHATSOEVER, ANY AIR CONTAMINANT, OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE (3) MINUTES IN ANY HOUR WHICH IS: AS DARK OR DARKER IN SHADE AS THAT DESIGNATED AS NO. 1 ON THE RINGLEMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES. 804: ALL PERSONS WHO OWN OR OTHERWISE HAVE JURISDICTION OVER AN OPEN AREA SHALL COMPLY WITH ONE OR MORE OF THE REQUIREMENTS OF SECTION F.1 TO COMPLY WITH THE CONDITIONS OF A STABILIZED SURFACE AT ALL TIMES AND LIMIT VDE TO 20% OPACITY IN ACCORDANCE WITH U.S. EPA TEST METHOD 9.	1/5/2022	Service Station
2022	6961		Brawley	ICAPCD RULE 407, NUISANCES; COND. NO. A.6	NO PERSON SHALL DISCHARGE FROM ANY SOURCE WHATSOEVER SUCH QUANTITIES OF AIR CONTAMINANTS OR OTHER MATERIAL WHICH CAUSE INJURY, DETRIMENT, NUISANCE OR ANNOYANCE TO ANY CONSIDERABLE NUMBER OF PERSONS OR TO THE PUBLIC OR WHICH ENDANGER THE COMFORT, REPOSE, HEALTH OR SAFETY OF ANY SUCH PERSONS OR THE PUBLIC OR WHICH CAUSE OR HAVE A NATURAL TENDENCY TO CAUSE INJURY OR DAMAGE TO BUSINESS OR PROPERTY.	1/24/2022	Stationary Source
2022		3095	Calipatria	NA	SCHEDULE THE ANNUAL TESTING FOR COMPLIANCE AND REPAIRS FOR ISD SYSTEM.	1/27/2022	Service Station
2022	6868		Niland	TITLE V PERMIT NO. V-3507, COND. NO. 2.III.A.1.A; ICAPCD PTO 3507A-1, COND. VI.B.3.A	THE NITROGEN OXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 2.5 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY 1-HOUR PERIOD, AND 3.975 POUNDS PER HOUR, VERIFIED BY CEMS.	2/16/2022	Stationary Source

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2022	6945		Brawley	ICAPCD PTO 4405A, COND. 19	19. PERMITTEE SHALL COMPILE AND RETAIN RECORDS THAT PROVIDE EVIDENCE OF DUST CONTROL AND TRACK-OUT PREVENTION MEASURE APPLICATION. RECORDS SHALL DESCRIBE, THE TYPE OF TREATMENT OR CONTROL MEASURE, EXTENT OF COVERAGE, AND DATE APPLIED. FOR CONTROL MEASURES WHICH REQUIRE MULTIPLE DAILY APPLICATIONS, RECORDING THE FREQUENCY OF APPLICATION WILL FULFILLL THE RECORDKEEPING REQUIREMENTS OF THIS RULE. RECORDS SHALL BE MAINTAINED AND BE READILY ACCESSIBLE FOR TWO YEARS AFTER THE DATE OF EACH ENTRY AND SHALL BE PROVIDED TO THE APCD UPON REQUEST.	2/18/2022	Paperwork
2022	6982	3061	Calipatria	ICAPCD PTO 1662, COND. 15	15. THE PERFORMANCE TESTS REQUIRED PURSUANT TO CONDITIONS NO. 11 AND 12 SHALL BE SUCCESSFULLY CONDUCTED AT LEAST ONCE IN EACH TWELVE (12) MONTH PERIOD AFTER THE DATE OF SUCCESSFUL COMPLETION OF THE STARTUP PERFORMANCE TESTING. TEST RESULTS SHALL BE SUBMITTED TO THE AIR DISTRICT WITHIN TWENTY (20) DAYS OF CONDUCTING THESE ANNUAL TESTS.	2/17/2022	Service Station
2022	6983	3056	Calipatria	ICAPCD RULE 112.D.5	RULE 112.D.5: NOTWITHSTANDING ANY OTHER PROVISION OF SECTION D, IF A PERSON FAILS TO COMPLY WITH A NOTICE OF COMPLY WITHIN THE PRESCRIBED PERIOD, OR IF THE APCDO DETERMINES THAT THE CIRCUMSTANCES SURROUNDING A PARTICULAR MINOR VIOLATION ARE SUCH THAT IMMEDIATE ENFORCEMENT IS WARRANTED TO PREVENT HARM TO THE PUBLIC HEALTH OR SAFETY OF OR TO THE ENVIRONMENT, THE APCO MAY TAKE ANY NEEDED ENFORCEMENT ACTION AUTHORIZED BY THE LAW. PERMITTEE WAS DIRECTED TO COMPLETE REPAIRS OF ISD SYSTEM AND SCHEDULE TO CONDUCT AND COMPLETE ALL REQUIRED ANNUAL PHASE II EVR TESTING FOR THE FACILITY PER NOTICE TO COMPLY #3056 BY JANUARY 5, 2022.	2/17/2022	Service Station
2022		3085	Calipatria	NA	CONTACT ICAPCD TO SCHEDULE AN ANNUAL INSPECTION OF THE PERMITTED UNITS ON-SITE TO ENSURE THAT REQUIRED RECORDS ARE BEING KEPT AND TO CONDUCT TEST. FAILURE TO DO SO WILL RESULT IN NOTICE OF VIOLATION.	2/23/2022	Stationary Source
2022	6932		Calipatria	ICAPCD PTO 4612, COND. B.2	B.2. THE QUANTITY OF COMPOST MATERIALS RECEIVED SHALL NOT EXCEED 1,500 WET TONS IN ANY ONE DAY AND 90,000 WET TONS IN ANY ONE CALENDAR YEAR.	3/17/2022	Unknown
2022	6933		Calipatria	ICAPCD PTO 4612, COND. B.2	B.2. THE QUANTITY OF COMPOST MATERIALS RECEIVED SHALL NOT EXCEED 1,500 WET TONS IN ANY ONE DAY AND 90,000 WET TONS IN ANY ONE CALENDAR YEAR.	3/17/2022	Unknown
2022	6870		Niland	TITLE V PERMIT NO. V-3507, COND. NO. 2.III.A.1.A; ICAPCD PTO NO. 3507A-1, COND. VI.B.3.A	THE NITROGEN OXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 2.5 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY 1-HOUR PERIOD, AND 3.975 POUNDS PER HOUR, VERIFIED BY CEMS.	3/10/2022	Stationary Source
2022		3087	Calipatria	ICAPCD PTO 4597, COND. 11 & 13	SUBMIT TO ICAPCD GENERATOR LOGS FOR 2022 AND 2021. PER CONDITION 11 AND 13 ON PERMIT TO OPERATE.	3/18/2022	Paperwork

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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2022	6956	3087	Calipatria	ICAPCD RULE 112.D.5 - NOTICE TO COMPLY; ICAPCD PTO 4597, COND. 12	RULE 112.D.5: NOTWITHSTANDING ANY OTHER PROVISION OF SECTION D, IF A PERSON FAILS TO COMPLY WITH A NOTICE TO COMPLY WITHIN THE PRESCRIBED PERIOD, OR IF THE APCO DETERMINES THAT THE CIRCUMSTANCES SURROUNDING A PARTICULAR MINOR VIOLATION ARE SUCH THAT IMMEDIATE ENFORCEMENT IS WARRANTED TO PREVENT HARM TO THE PUBLIC HEALTH OR SAFETY OF OR TO THE ENVIRONMENT, THE APCO MAY TAKE ANY NEEDED ENFORCEMENT ACTION AUTHORIZED BY THE LAW. PTO 4597, COND. 12: PERMITTEE SHALL MAINTAIN ALL RECORDS REQUIRED BY THIS PERMIT FOR A MINIMUM OF TWO (2) CALENDAR YEARS. THESE RECORDS SHALL BE MAINTAINED WITH THE UNIT OR AT THE COMPANY'S OFFICE, AND SHALL BE MADE AVAILABLE TO THE DISTRICT UPON REQUEST.	4/4/2022	Stationary Source
2022	7032		Brawley	ICAPCD PTO 364D-3, COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/28/2022	Annual Report
2022	7040		Calipatria	ICAPCD PTO 2130, COND. NO. 20	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND/OR EMERGENCY USE FOR THE UNITS. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Paperwork
2022	7041		Calipatria	ICAPCD PTO 2139, COND. NO. 15	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND/OR EMERGENCY USE FOR THE UNITS. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Paperwork
2022	7043		Calipatria	ICAPCD PTO 2998, COND. NO. 15	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND/OR EMERGENCY USE FOR THE UNITS. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Paperwork
2022	7042		Calipatria	ICAPCD PTO 2996, COND. NO. 18	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER DAY/MONTH FOR MAINTENANCE/TESTING AND/OR EMERGENCY USE FOR THE UNITS. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Paperwork
2022	7044		Brawley	ICAPCD PTO 423D-4, COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/27/2022	Annual Report
2022	7046		Brawley	ICAPCD PTO 4105, COND. NO. 17	THE APCD SHALL RECEIVE FROM THE PERMITTEE AN ANNUAL REPORT CONTAINING THE MONTHLY CONSUMPTION OF ANY COATING. THIS DOCUMENT SHALL BE SUBMITTED TO THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/28/2022	Annual Report
2022	7052		Calipatria	ICAPCD PTO 2530B, COND. NO. 15	PERMITTEE SHALL SUBMIT TO THE ICAPCD A YEARLY REPORT CONTAINING THE MONTHLY PRODUCTION TONNAGE OF COMPRESSED HAY AND THE AVERAGE OPERATING TIME PER DAY. THIS REPORT SHALL REACH THE ICAPCD WITHIN 30 DAYS OF THE PRECEDING YEAR.	4/29/2022	Annual Report

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

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2022	7056		Calipatria	ICAPCD RULE 201.B, PERMITS REQUIRED	201.B: SUBJECT TO THE EXEMPTIONS CONTAINED IN RULE 202 OF THIS PART, EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT.	4/29/2022	Permit
2022	7058		Calipatria	ICAPCD PTO 4274, COND. NO. 14	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR MAINTENANCE/TESTING AND/OR EMERGENCY USE FOR THE UNIT. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Paperwork
2022	7057		Calipatria	ICAPCD RULE 201.B, PERMITS REQUIRED	201.B: SUBJECT TO THE EXEMPTIONS CONTAINED IN RULE 202 OF THIS PART, EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT.	4/29/2022	Permit
2022	7059		Calipatria	ICAPCD PTO 2479, COND. NO. 7	THE PERMITTE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE ABRASIVES USED DURING THE YEAR. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Annual Report
2022	7060		Calipatria	ICAPCD PTO 2131, COND. NO. 18	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Annual Report
2022	7061		Calipatria	ICAPCD PTO 2750, COND. NO. 9	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE TOTAL POUNDS AND BRAND NAME OF THE PAINT, SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Annual Report
2022	7055		Calipatria	ICAPCD RULE 401 - OPACITY OF EMISSIONS	RULE 401: NO PERSON SHALL RELEASE OR DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSION WHATSOEVER, ANY AIR CONTAMINANT, OTHER THAN UNCOMBINED WATER VAPOR, FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE (3) MINUTES IN ANY HOUR WHICH IS: AS DARK OR DARKER IN SHADE AS THAT DESIGNATED AS NO. 1 ON THE RINGLEMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES.	4/27/2022	Stationary Source
2022	7062		Calipatria	ICAPCD PTO 3525, COND. NO. 8	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE TOTAL GALLONS AND BRAND NAME OF THE PAINT, SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Annual Report
2022	7063		Calipatria	ICAPCD PTO 3526, COND. NO. 8	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE TOTAL GALLONS AND BRAND NAME OF THE PAINT, SOLVENTS AND THINNERS CONSUMED DURING THE YEAR. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/21/2022	Annual Report

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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2022	7065		Brawley	ICAPCD PTO 3296, COND. NO. 16	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE HOURS OF OPERATION AND FUEL CONSUMPTION PER DAY FOR MAINTENANCE, TESTING AND EMERGENCY USE; AND ON A SEPARATE SECTION, THE HOURS OF OPERATION AND FUEL CONSUMPTION PER MONTH. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	4/20/2022	Annual Report
2022	7079		Niland	ICAPCD PTO 1184B-4, COND. NO. 17	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/29/2022	Annual Report
2022	7102		Brawley	ICAPCD PTO 2520, COND. NO. C.4	THE PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE TONNAGE OF GRAIN/SEEDS RECEIVED AND PROCESSED PER MONTH DURING THE YEAR. THE ANNUAL REPORT SHALL BE SUBMITTED TO THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/29/2022	Annual Report
2022		3137	Brawley	ICAPCD PTO 2296, COND. NO. 13	PERMITTEE SHALL SUBMIT TO THE ICAPCD AN ANNUAL REPORT CONTAINING THE MONTHLY PAINT, SOLVENT THINNER CONSUMPTION. THIS REPORT SHALL BE SUBMITTED TO THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/26/2022	Annual Report
2022		3158	Brawley	ICAPCD PTO 4150 COND. NO. 21	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/24/2022	Annual Report
2022		3159	Westmorland	ICAPCD PTO 2573, COND. NO. 18	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/26/2022	Annual Report
2022	7083	3159	Westmorland	ICAPCD PTO 2573B-3, COND. NO. 18; ICAPCD RULE 112.D.5 - FAILURE TO COMPLY WITH A NOTICE TO COMPLY (NTC #3159)	PTO 2573.18: PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR (2021). THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH. RULE 112.D.5: NOTWITHSTANDING ANY OTHER PROVISION OF SECTION D, IF A PERSON FAILS TO COMPLY WITH A NOTICE TO COMPLY WITHIN THE PRESCRIBED PERIOD, OR IF THE APCO DETERMINES THAT THE CIRCUMSTANCES SURROUNDING A PARTICULAR MINOR VIOLATION ARE SUCH THAT IMMEDIATE ENFORCEMENT IS WARRANTED TO PREVENT HARM TO THE PUBLIC HEALTH OR SAFETY OR TO THE ENVIRONMENT, THE APCO MAY TAKE ANY NEEDED ENFORCEMENT ACTION AUTHORIZED BY THE LAW.	5/25/2022	Annual Report

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2022	7104	3116	Niland	ICAPCD PTO 4644, COND. NO. 13; ICAPCD RULE 112.D.5 - FAILURE TO COMPLY WITH A NOTICE TO COMPLY (NTC #3116)	PTO 4644.13: PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE DAILY AND MONTHLY HOURS OF OPERATION FOR THE UNIT LISTED. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR. RULE 112.D.5: NOTWITHSTANDING ANY OTHER PROVISION OF SECTION D, IF A PERSON FAILS TO COMPLY WITH A NOTICE TO COMPLY WITHIN THE PRESCRIBED PERIOD, OR IF THE APCO DETERMINES THAT THE CIRCUMSTANCES SURROUNDING A PARTICULAR MINOR VIOLATION ARE SUCH THAT IMMEDIATE ENFORCEMENT IS WARRANTED TO PREVENT HARM TO THE PUBLIC HEALTH OR SAFETY OR TO THE ENVIRONMENT, THE APCO MAY TAKE ANY NEEDED ENFORCEMENT ACTION AUTHORIZED BY THE LAW.	5/27/2022	Annual Report
2022		3116	Niland	ICAPCD PTO 4644, COND. NO. 13	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE DAILY AND MONTHLY HOURS OF OPERATION FOR THE UNIT LISTED. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	5/2/2022	Annual Report
2022		3119	Niland	ICAPCD PTO 1184B-5, COND. NO. 23	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/2/2022	Annual Report
2022	7089	3131	Brawley	ICAPCD PTO 4404A-1, COND. NO. C.1; ICAPCD RULE 201.A, PERMITS REQUIRED	C.1: MODIFICATIONS: PERMITTEE SHALL NOTIFY THE DISTRICT OF ANY MATERIAL PHYSICAL CHANGE, CHANGES IN METHOD OF OPERATION, EXPANSION OF THE FACILITY AND ADDITIONS INCLUDING THE EQUIPMENT THAT RESULTS IN A NET EMISSION INCREASE. RULE 201.A: A. AUTHORITY TO CONSTRUCT: EACH PERSON CONSTRUCTING, ERECTING, INSTALLING, MODIFYING, OR REPLACING ANY ARTICLE, MACHINE, EQUIPMENT OR CONTRIVANCE, THE USE OF WHICH MAY EMIT OR CONTROL AIR CONTAMINANTS, SHALL FIRST OBTAIN WRITTEN AUTHORIZATION FOR SUCH CONSTRUCTION FROM THE AIR POLLUTION CONTROL OFFICER, EXCEPT AS MAY BE EXEMPTED HEREIN.	6/27/2022	Paperwork
2022		3110	Calipatria	NOT PROVIDED	SUBMIT TO THE APCD A EQUIPMENT MODIFICATION TO SHOW NEW CARBON MATERIAL INSTEAD OF IRON SPONGE IN FLAIR CONTROL EQUIPMENT BY THE DUE DATE OF 7/11/22. (UP TO APCD IF APPLICATION IS REQUIRED).	6/27/2022	Paperwork
2022		3131	Brawley	ICAPCD RULE 201.A, PERMITS REQUIRED	OBTAIN AND SUBMIT AN APPLICATION FOR HAY COMPRESS NEW LINE.	6/23/2022	Permit
2022	7091		Brawley	ICAPCD PTO 2610A-3, COND. NO. 7	7. ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT.	7/26/2022	Service Station
2022	7137		Calipatria	ICAPCD RULE 801.E.1.C - CONSTRUCTION AND EARTHMOVING ACTIVITIES	ALL PERSONS WHO OWN OR OPERATE A CONSTRUCTION SITE OF 10 ACRES OR MORE IN SIZE FOR RESIDENTIAL DEVELOPMENTS OR 5 ACRES OR MORE FOR NON-RESIDENTIAL DEVELOPMENTS SHALL DEVELOP A DUST CONTROL PLAN. THE DUST CONTROL PLAN SHALL BE MADE AVAILABLE TO THE APCD UPON REQUEST. THE DUST CONTROL PLAN SHALL COMPY WITH REQUIREMENTS OF SECTION F.	8/19/2022	Paperwork

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2022	7138		Calipatria	ICAPCD RULE 801.E.1.B - CONSTRUCTION AND EARTHMOVING ACTIVITIES; ICAPCD RULE 805.E.1 - CONSTRUCTION AND EARTHMOVING ACITIVITES	801.E.1.B: ALL PERSONS WHO PERFORM ANY EARTHMOVING ACTIVITIES SHALL COMPLY WITH THE REQUIREMENTS OF SECTION F.1 SO AS TO LIMIT VDE TO 20% OPACITY. 805.E.1: UNPAVED HAUL/ACCESS ROADS: NO PERSON SHALL CAUSE, SUFFER OR ALLOW THE OPERATION, USE, OR MAINTENANCE OF ANY UNPAVED HAUL/ACCESS ROAD WITHOUT COMPLYING WITH ONE OR MORE OF THE REQUIREMENTS OF SECTION F.1 SO AS TO LIMIT VDE TO 20% OPACITY.	8/19/2022	Dust/Opacity
2022	7139		Calipatria	ICAPCD RULE 201.B - PERMITS REQUIRED	201.B: SUBJECT TO THE EXEMPTIONS CONTAINED IN RULE 202 OF THIS PART, EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT.	8/22/2022	Permit
2022	7141		Calipatria	ICAPCD RULE 801.E.1.B - CONSTRUCTION AND EARTHMOVING ACTIVITIES	801.E.1.B: ALL PERSONS WHO PERFORM ANY EARTHMOVING ACTIVITIES SHALL COMPLY WITH THE REQUIREMENTS OF SECTION F.1 SO AS TO LIMIT VDE TO 20% OPACITY.	8/22/2022	Dust/Opacity
2022		3112	Brawley	NOT PROVIDED	TEST THE PHASE I AND PHASE II VAPOR RECOVERY BY THE DUE DATE.	8/30/2022	Service Station
2022		3141	Brawley	NOT PROVIDED	FIX MURPHY RODGER DUST COLLECTOR. CLEAN OUTSIDE THE COATING SITE.	8/31/2022	Dust/Opacity
2022		3166	Calipatria	ICAPCD RULE 201	SUBMIT A PERMIT APPLICATION WITH THE PERMITTING DIVISION TO UPDATE THE POTENTIAL ANNUAL THROUGHPUT OF THE ABOVEGROUND GASOLINE STORAGE TANK (PERMIT TO OPERATE #4431).	8/3/2022	Permit
2022	6992		Brawley	ICAPCD PTO 4150A-1, COND. NO. 16	16. THE PERFORMANCE TESTS REQUIRED PURSUANT TO CONDITIONS NO. 12 AND 13 SHALL BE SUCCESSFULLY CONDUCTED, AND WITNESSED BY THE DISTRICT, AT LEAST ONCE IN EACH TWELVE (12) MONTH PERIOD AFTER THE DATE OF SUCCESSFUL COMPLETION OF THE STARTUP PERFORMANCE TESTING. TEST RESULTS SHALL BE SUBMITTED TO THE AIR DISTRICT WITHIN TWENTY (20) DAYS OF CONDUCTING THESE ANNUAL TESTS. ALL REQUIRED TESTING SHALL BE PERFORMED BY A CERTIFIED CONTRACTOR AS REQUIRED PER THE EXECUTIVE ORDERS OF THIS PERMIT.	9/6/2022	Service Station
2022		3179	Brawley	NOT PROVIDED	FIX THE DOOR TO THE COOKING/RENDERING AREA. FIX SEALS AROUND DOOR AROUND RENDERING AREA.	10/20/2022	Unknown
2022		3185	Brawley	NOT PROVIDED	SUBMIT AN AUTHORITY TO CONSTRUCT.	10/27/2022	Permit
2022	7006		Niland	ICAPCD PTO 3507A-1, COND. NO. VI.B.3.B; TITLE V V-3507, COND. NO. 2.III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% O2, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	11/2/2022	Stationary Source
2022	7007		Niland	ICAPCD PTO 3507A-1, COND. NO. VI.B.3.B; TITLE V V-3507, COND. NO. 2.III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% O2, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	11/22/2022	Stationary Source

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2022	7175		Brawley	ICAPCD RULE 201.B, PERMITS REQUIRED	B. SUBJECT TO THE EXEMPTIONS CONTAINED IN RULE 202 OF THIS PART, EACH PERSON WHO USES OR OPERATES ANY ARTICLE, MACHINE, EQUIPMENT, OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT. A SINGLE PERMIT TO OPERATE MAY BE ISSUED FOR ALL COMPONENTS OF AN INTEGRATED SYSTEM OR PROCESS.	11/10/2022	Permit
2022		3101	Brawley	NOT PROVIDED	CONDUCT SOURCE TESTING OF WET CONCENTRATE DRYING OVEN MERCURY SOURCE TEST ON OR BEFORE 1-10-2023.	11/2/2022	Stationary Source
2023	7275		Niland	COND. NO. 23	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/17/2023	Annual Report
2023	7272		Calipatria	COND. NO. 26; COND. NO. 28	26: PERMITTEE SHALL SUBMIT TO THE ICAPCD AN ANNUAL REPORT CONTAINING THE FUEL CONSUMED AND WEIGHT OF MATERIAL INCINERATED PER MONTH. THIS REPORT SHALL BE SUBMITTED TO THE DISTRICT BY THE END OF FEBRUARY OF EACH OPERATING YEAR. 28: PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOUR OPERATED PER DAY/MONTH.	4/14/2023	Annual Report
2023	7209		Calipatria	COND. NO. 15	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE DAILY HOURS OF OPERATION AND THE MONTHLY FUEL CONSUMPTION FOR THE LISTED WATER PUMP. THIS REPORT SHALL REACH THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	4/14/2023	Annual Report
2023	7273		Calipatria	COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28.	4/14/2023	Annual Report
2023	6897		Brawley	COND. NO. 10;	THE PERMITTEE SHALL SUBMIT TO THE APCD ON OR BEFORE JANUARY 1, 2002, AND EACH YEAR THEREAFTER, AN ANNUAL COMPLIANCE PLAN WHICH UPDATES THE FOLLOWING INFORMATION DESCRIBED IN SECTION C.1: A. LIST OF ALL SIGNIFICANT SOURCES OF AIR POLLUTION, INCLUDING STATIONARY COMBUSTION EQUIPMENT, STATIONARY IRRIGATION PUMPS, GASOLINE STORAGE TANKS, ETC, WITH THE FREQUENCY OF USAGE OF THE EQUIPMENT. B. THE MONTHLY AND ANNUAL TOTAL PRODUCTION ANIMAL HEAD COUNT. C. THE LCAF EMISSION MITIGATION PLANT (BEEF FEEDLOTS) AND DUST CONTROL PLAN.	4/14/2023	Paperwork
2023	7204		Niland	COND. NO. 13	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE DAILY AND MONTHLY HOURS OF OPERATION FOR THE UNIT LISTED. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	4/10/2023	Annual Report

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2023	7205		Brawley	COND. NO. 14; RULE 112.D.5	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE HOURS OF OPERATION AND FUEL CONSUMPTION PER DAY FOR MAINTENAINCE, TESTING AND EMERGENCY USE; AND ON A SEPARATE SECTION, THE HOURS OF OPERATION AND FUEL CONSUMPTION PER MONTH. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	4/10/2023	Annual Report
2023	7269		Westmorland	COND. NO. 16	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/17/2023	Annual Report
2023	7329		Calipatria	COND. NO. 6	ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT.	12/19/2023	Stationary Source
2023	7225		Calipatria	COND. NO. 13; RULE 112.D.5	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY HOURS OF OPERATION FOR EACH UNIT. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	4/10/2023	Annual Report
2023	7281		Calipatria	COND. NO. 12	PERMITTEE SHALL INSTALL AND MAINTAIN A DUST SUPPRESSION SYSTEM FOR ALL UNPAVED HAUL AND ACCESS ROADS CONSISTING OF ANY OF THE FOLLOWING: COMPACTED GRAVEL, RECRUSHED/RECYCLED ASPHALT, WATER APPLICATION OR OTHER FORMS OF PHYSICAL STABILIZATION ON ALL UNPAVED HAUL ACCESS ROADS AND PARKING AREAS WITHIN THE FACILITY.	5/15/2023	Dust/Opacity
2023	7315		Brawley	COND. NO. 24	PERMITTEE SHALL PERFORM WEEKLY SELF-INSPECTION AND MAINTENANCE INSPECTIONS TO ENSURE THAT FACILITY OPERATIONS ARE MAINTAINING COMPLIANCE. ADDITIONALLY, MONTHLY LIQUID AND VAPOR LEAK INSPECTIONS SHALL BE CONDUCTED DURING PRODUCT TRANSFER OPERATIONS. INFORMATION RECORDED SHALL INCLUDE DATE OF INSPECTION, FINDINGS, LEAK DETERMINATION METHOD, CORRECTIVE ACTION, AND NAME AND SIGNATURE OF PERSON PERFORMING THE INSPECTION. THE INFORMATION SHALL BE LOGGED IN A FORMAT THAT IS AVAILABLE AND APPROVED BY THE AIR DISTRICT.	9/20/2023	Paperwork
2023	7292	3271	Westmorland	COND. NO. 22; COND. NO. 23	22. THE PERMITTEE SHALL MAINTAIN ON THE PREMISES A LOG OF ANY REPAIRS MADE TO THE CERTIFIED PHASE I OR II VAPOR RECOVERY SYSTEM… 23. PERMITTEE SHALL PERFORM WEEKLY SELF-INSPECTION AND MAINTENANCE INSPECTIONS TO ENSURE THAT FACILITY OPERATIONS ARE MAINTAINING COMPLIANCE...	8/8/2023	Paperwork
2023	7327		Calipatria	COND. NO. D.2; COND. NO. D.5	D.2: ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT. D.5: UNCERTIFIED, MISSING, OR IMPROPERLY INSTALLED EQUIPMENT AND EMISSION RELATED DEFECTS SHALL BE TAGGED OUT OF SERVICE IMMEDIATELY. SUCH DEFECTS INCLUDE, BUT ARE NOT LIMITED TO, SUFFERED DAMAGE OR WEAR WHICH PREVENTS PROPER OPERATION OF EQUIPMENT.	12/20/2023	Stationary Source

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2023	7291		Westmorland	COND. NO. 8; COND. NO. 19	8. ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT. 19. UNCERTIFIED, MISSING, OR IMPROPERLY INSTALLED EQUIPMENT AND EMISSION RELATED DEFECTS SHALL BE TAGGED OUT OF SERVICE IMMEDIATELY. SUCH DEFECTS INCLUDE, BUT ARE NOT LIMITED TO, SUFFERED DAMAGE OR WARE AND TEAR, WHICH PREVENTS PROPER OPERATION OF THE EQUIPMENT.	8/21/2023	Service Station
2023	7008		Niland	ICAPCD PTO 3507A-1, COND. B.3.B; TITLE V PERMIT NO. V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	2/16/2023	Stationary Source
2023	7011		Niland	ICAPCD PTO 3507A-1, COND. B.3.B; TITLE V PERMIT V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	3/14/2023	Stationary Source
2023	7130		Niland	ICAPCD PTO 3507A-1, COND. NO. B.3.A; TITLE V PERMIT V-3507, COND. NO. III.A.1.A	EXCEEDING THE NOX POUNDS PER HOUR LIMIT: THE NITROGEN OXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 2.5 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY 1-HOUR PERIOD, AND 3.975 POUNDS PER HOUR, VERIFIED BY CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS).	5/16/2023	Stationary Source
2023	7192		Niland	ICAPCD PTO 3507A-1, COND. NO. B.3.B; TITLE V PERMIT V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	7/5/2023	Stationary Source
2023	7131		Niland	ICAPCD PTO 3507A-1, COND. NO. B.3.A; TITLE V PERMIT V-3507, COND. NO. III.A.1.A	EXCEEDING THE NOX EMISSIONS CONCENTRATION LIMIT: THE NITROGEN OXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 2.5 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY 1-HOUR PERIOD, AND 3.975 POUNDS PER HOUR, VERIFIED BY CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS).	5/16/2023	Stationary Source
2023	7305		Niland	ICAPCD PTO 3507A-1, COND. NO. B.3.B; TITLE V PERMIT V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	12/6/2023	Stationary Source
2023	7311		Niland	ICAPCD PTO 3507A-1, COND. NO. B.3.B; TITLE V PERMIT V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	12/21/2023	Stationary Source

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YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2023	7300		Niland	ICAPCD PTO 3507A-1, COND. NO. B.3.A; TITLE V PERMIT V-3507, COND. NO. III.A.1.A	EXCEEDING THE NOX POUNDS PER HOUR LIMIT, AND EXCEEDING THE NOX EMISSIONS CONCENTRATION LIMIT: THE NITROGEN OXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 2.5 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY 1-HOUR PERIOD, AND 3.975 POUNDS PER HOUR, VERIFIED BY CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS).	8/16/2023	Stationary Source
2023	7009		Niland	ICAPCD PTO 3507A-1, COND. B.3.B; TITLE V PERMIT NO. V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	2/15/2023	Stationary Source
2023	7010		Niland	ICAPCD PTO 3507A-1, COND. B.3.B; TITLE V PERMIT NO. V-3507, COND. NO. III.A.1.B	THE CARBON MONOXIDE EMISSION CONCENTRATION AT EACH EXHAUST POINT SHALL NOT EXCEED 6 PPMV, ON A DRY BASIS, CORRECTED TO 15% 02, AVERAGED OVER ANY ROLLING 3-HOUR PERIOD, AND 5.81 POUNDS PER HOUR, VERIFIED BY CEMS.	2/17/2023	Stationary Source
2023		3272	Westmorland	COND. NO. 16	CONDUCT AND PASS PRESSURE DECAY TEST BY TOMORROW 7-26-2023 AT 9:00 AM AND TO FIX/REPLACE HOSES.	7/25/2023	Service Station
2023		2739	Calipatria	NOT PROVIDED	TEST THE VAPOR RECOVERY BY THE DUE DATE OF 12/13/23 (FUEL TANK).	12/6/2023	Stationary Source
2023		2294	Brawley	COND. NO. 17	PERMITTEE SHALL ANNUALLY SUBMIT TO THE APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THE ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/11/2023	Annual Report
2023		3237	Westmorland	COND. NO. 29	PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE GASOLINE THROUGHPUT FROM THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	4/10/2023	Annual Report
2023		3271	Westmorland	COND. NO. 22; COND. NO. 23	MAINTAIN A LOG BOOK TO BE IN COMPLIANCE WITH CONDITIONS #22 AND 23 IN ORDER TO PERFORM WEEKLY SELF-INSPECTION.	7/26/2023	Paperwork
2023		3273	Brawley	COND. NO. 24; COND. NO. 26	ADD A LOGBOOK WHICH INCLUDES REPAIR HISTORY AND WEEKLY SELF-INSPECTIONS. IN ADDITION TO POST THE AIR DISTRICT'S PHONE NUMBER ON DISPENSERS FOR COMPLAINTS (COND. #26).	8/29/2023	Paperwork
2023	7199		Brawley	COND. NO. 13	PERMITTEE SHALL SUBMIT A SOURCE TEST PLAN TO THE APCD AT LEAST 30 DAYS PRIOR TO THE SCHEDULED SOURCE TEST DATE, AND AT LEAST SEVEN DAYS PRIOR TO THE SOURCE TEST, THE PERMITTEE SHALL NOTIFY THE APCD OF THE EXACT DATE AND TIME OF THE SOURCE TEST. A FINAL SOURCE TEST REPORT SHALL BE SUBMITTED TO THE APCD WITHIN 30 DAYS FOLLOWING THE ACTUAL SOURCE TEST.	7/18/2023	Paperwork
2023		3253	Niland	COND. NO. 12; COND. NO. 13; COND. NO. 16	PERFORM TEST REQUIRED PURSUANT TO CONDITIONS NO. 12 AND 13 SHALL BE SUCCESSFULLY CONDUCTED AT LEAST ONCE IN EACH 12 MONTH PERIOD.	5/12/2023	Service Station
2023		3207	Brawley	NOT PROVIDED	MAKE REPAIRS TO THE VAPOR RECOVERY BY THE DUE DATE OF 7/21/23 AT 11:00 AM (VAPOR BURNER).	7/20/2023	Service Station

Table F-4.a. NOVs and NTCs Issued within the North End Phase 1 Community

Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

YEAR	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation

Notes:

1. This list includes all NTCs and NOVs issued for sources located within the North End Phase 1 Community (i.e., within the cities of Brawley, Calipatria, Niland, and Westmorland) from 2021 to 2023.

Abbreviations:

NOV - Notice of
NTC - Notice to
PTO - Permit to Operate

Table F.4.b. Types of NOVs and NTCs Issued within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Violation Type	Year			Total Number of NOVs/NTCs Received	Percent of Total NOVs/NTCs
	2021	2022	2023		
Annual Report	33	19	10	62	42%
Dust/Opacity	1	3	1	5	3%
Open Burn	1	0	0	1	1%
Paperwork	2	10	6	18	12%
Permit	5	8	0	13	9%
Service Station	6	7	4	17	12%
Stationary Source	4	9	13	26	18%
Unknown	1	4	0	5	3%
Grand Total	53	60	34	147	100%

Notes:

1. The table above is a summary of the data provided in Table F-4a that totals the number of NTCs and NOVs in by violation type for sources located at facilities within Brawley, Calipatria, Niland, and Westmorland from 2021 to 2023.

Abbreviations:

NOV - Notice of Violation

NTC - Notice to Comply

Table F-4.b. Types of NOVs and NTCs Issued within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Violation Type	Year			Total Number of NOVs/NTCs Received	Percent of Total NOVs/NTCs
	2021	2022	2023		
Annual Report	33	19	10	62	42%
Dust/Opacity	1	3	1	5	3%
Open Burn	1	0	0	1	1%
Paperwork	2	10	6	18	12%
Permit	5	8	0	13	9%
Service Station	6	7	4	17	12%
Stationary Source	4	9	13	26	18%
Unknown	1	4	0	5	3%
Grand Total	53	60	34	147	100%

Notes:

1. The table above is a summary of the data provided in Table F-4a that totals the number of NTCs and NOVs in by violation type for sources located at facilities within Brawley, Calipatria, Niland, and Westmorland from 2021 to 2023.

Abbreviations:

NOV - Notice of Violation

NTC - Notice to Comply

Table F.4.c. NOVs and NTCs by Permit to Operate for Facilities Within the North End Phase 1 Community
Imperial County Year 5 Community Emissions Reduction Program Plan
for the North End Phase 1 Community

Address	Facility	Year			Total
		2021	2022	2023	
	Total Number of NTCs and NOVs	53	60	34	147
	Number of Facilities that received an NTC and/or NOV	32	30	19	57
	Non-Compliance Rate	30%	28%	18%	

Constants:

108 Number of Facilities with ICAPCD permits in North End Phase 1 Community

Notes:

1. The table above uses data provided in Table F-4a to total the number of NTCs and NOVs by facility within the North End Phase 1 Community from 2021 to 2023. The non-compliance rate is the fraction of facilities that received at least one NTC/NOV in a given year.

Abbreviations:

NOV - Notice of Violation

NTC - Notice to Comply

APPENDIX G
EMISSION REDUCTION CALCULATIONS

Table G.1. Strategy M-1: Emissions Reductions and Costs, Example Parking Lot Paving Project
Imperial County Year 5 Community Emission Reduction Program Plan
for the North End Phase 1 Community

Surface Area[1] Acres/Project	Number of Vehicle Passes per Project[1] Trips/Day/Project	Vehicle Miles Traveled per Project VMT/yr	Emission Factor[2] lbs PM_{10}/VMT	Uncontrolled Emissions per Project[2] ton/yr		Controlled Emissions per Project, Watering[4] ton/yr		Controlled Emissions per Project, Paving[5] ton/yr	
				PM_{10}	$PM_{2.5}$[3]	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
1.5	250	4,470	1.94	4.34	0.43	1.95	0.20	0.04	0.004

Project Life (years)	Discount Rate[6]	Capital Recovery Factor[6]	Estimated Cost per Project[1]	Annualized Cost per Project	Cost-Effectiveness of Paving, ($/ton reduced)	
					PM_{10}	$PM_{2.5}$
7	4%	0.167	$ 406,480	$ 67,723	$ 15,778	$ 157,775

Notes:

[1] Assumptions based on Calexico Unified School District Parking Lot Paving Project for paving of one 1.5 acre lot. Actual emission reductions and costs will depend on the number and size of projects implemented.

[2] Calculation methodology and emission factor based on CARB Miscellaneous Process Methodology 7.10 - Unpaved Road Dust, Non-Farm Roads. Incorporates rainfall adjustment factor assuming an average of 11 days per year at the project site with rainfall greater than 0.01 inches. Available at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-10_2012.pdf. Accessed: November 2024.

[3] $PM_{2.5}$ is calculated from PM_{10} emissions (tpy) using ARB's size specification profile #470. The size profile assumes that the PM10 fraction of total PM emissions is 0.5943 and the $PM_{2.5}$ fraction is 0.0594. $PM_{2.5}$ emissions (tons/year) = [PM10(tons/year)/0.5943] x 0.0594. Available at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-10_2012.pdf. Accessed: November, 2024.

[4] Assumes twice daily watering eliminates 55% of fugitive dust emissions from the source. Control efficiency is based on Western Regional Air Partnership Fugitive Dust Handbook, Table 6-6. Control Efficiencies for Control Measures for Unpaved Roads. Available at: https://www.env.nm.gov/wp-content/uploads/sites/2/2017/02/WRAP_FDHandbook_Rev_06.pdf. Accessed: November 2024.

[5] Assumes paving of unpaved roads and unpaved parking areas reduces fugitive dust emissions from the source by 99%. Control efficiency is based on Western Regional Air Partnership Fugitive Dust Handbook, Table 6-6. Control Efficiencies for Control Measures for Unpaved Roads. Available at: https://www.env.nm.gov/wp-content/uploads/sites/2/2017/02/WRAP_FDHandbook_Rev_06.pdf. Accessed: November 2024.

[6] The "Discount Rate" of 4% and the methodology for calculating CRF and annualized cost are referenced from CARB's 2024 Carl Moyer Program Guidelines, Appendix E: Cost Effectiveness Limits, Discount Rates, and Capital Recovery Factors. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-08/AppendixEnew.pdf. Accessed: November 2024.

Constants:

[4] 55% Control efficiency based on twice daily watering

[5] 99% Control efficiency for paving unpaved roads

Abbreviations:

CRF - capital recovery factor

lbs - pounds

$PM_{2.5}$ - particulate matter less than 2.5 microns in diameter

PM_{10} - particulate matter less than 10 microns in diameter

VMT - vehicles miles traveled

yr - year

Table G.2. Estimated Emission Reductions and Costs Related to Strategy T-1, School Bus Replacement

Imperial County Year 5 Community Emission Reduction Program Plan
for the North End Phase 1 Community

		Baseline Bus			Electric Bus	Units
Emissions						
Project Life		10				(years)
Total Distance[1]		7,049				(miles/year/bus)
Expected First Year of Operation of Electric Bus		2026	2030	2035	--	
Baseline Engine Model Year[1]		1999	1999	1999	--	
Percent Operation in California		100%				
Equipment Deterioration Life[2,3]		32	36	41	5	(years)
Total Equipment Activity[4,5]		225,568	253,764	289,009	35,245	(miles)
Emission Factor	**NO_X**	10.33	10.33	10.33	0	(g/mile)
	ROG	0.28	0.28	0.28	0	(g/mile)
	PM	0.266	0.266	0.266	0	(g/mile)
Deterioration Rate	**NO_X**	0.072	0.072	0.072	0	(g/mile/10K miles)
	ROG	0.036	0.036	0.036	0	(g/mile/10K miles)
	PM	0.0116	0.0116	0.0116	0	(g/mile/10K miles)
Deterioration Product[6]	**NO_X**	1.624	1.827	2.081	0	(g/mile)
	ROG	0.812	0.914	1.040	0	(g/mile)
	PM	0.262	0.294	0.335	0	(g/mile)
Emissions per Bus[7]	**NO_X**	0.093	0.094	0.096	0	(tons/year)
	ROG	0.008	0.009	0.010	0	(tons/year)
	PM	0.004	0.004	0.005	0	(tons/year)
Emission Reductions per Bus	**NO_X**	0.093	0.094	0.096	--	(tons/year)
	ROG	0.008	0.009	0.010	--	(tons/year)
	PM	0.004	0.004	0.005	--	(tons/year)

Table G.2. Estimated Emission Reductions and Costs Related to Strategy T-1, School Bus Replacement

Imperial County Year 5 Community Emission Reduction Program Plan
for the North End Phase 1 Community

		Baseline Bus			Electric Bus	Units
Cost-Effectiveness						
Discount Rate[8]		4%				--
Capital Recovery Factor[8]		0.123				--
Estimated Cost per Bus[1]		$295,000				($/bus)
Annualized Cost per Project		$36,371				($/year)
Cost Effectiveness	**NO_X**	$391,564	$385,025	$377,153	--	($/ton)
	ROG	$4,286,262	$3,921,736	$3,544,892	--	
	PM	$8,870,864	$8,353,091	$7,785,092	--	

Notes:

[1] Based on Heber Electric School Bus Replacement Project (School Bus Replacement Type A)

[2] Baseline Equipment Deterioration Life = Expected First Year of Operation - Baseline Engine Model Year + Project Life/2

[3] Electrified Equipment Deterioration Life = Project Life/2

[4] Baseline total equipment activity = total miles (miles/yr) * Baseline Equipment Deterioration Life

[5] Electrified total equipment activity = total miles (miles/yr) * Electrified Equipment Deterioration Life

[6] Deterioration product = Baseline deterioration rate / 10000 * Baseline Total Equipment Activity

[7] Annual Emissions = Pollutant Emission Factor + Pollutant Deterioration Product * Total Distance * Percent operation in California

[8] The "Discount Rate" of 4% and the methodology for calculating CRF and annualized cost are referenced from CARB's 2024 Carl Moyer Program Guidelines, Appendix E: Cost Effectiveness Limits, Discount Rates, and Capital Recovery Factors. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-08/AppendixEnew.pdf. Accessed: November 2024.

Abbreviations:

g - grams

lb - pounds

NO_X - oxides of nitrogen

PM - particulate matter

ROG - reactive organic compounds

APPENDIX H
CARB ENFORCEMENT APPENDICES

Appendix H: CARB Enforcement-Related Appendices

Mobile Source Regulations

Drayage: The Drayage Truck Regulation is part of CARB's ongoing efforts to reduce particulate matter and oxides of nitrogen emissions from diesel-fueled engines and improve air quality associated with goods movement. Heavy-Duty Vehicles that carry goods to or from a port or intermodal facility are required to be equipped with a 2007 or newer model year engine. This requirement becomes stricter in 2023, when Drayage trucks are required to be equipped with a 2010 or newer model year engine, because Drayage trucks will be required to meet the standards of the Truck and Bus Regulation.

Heavy-Duty Vehicle Inspection Program: The Heavy-Duty Vehicle Inspection Program (HDVIP) program requires heavy-duty trucks and buses to be inspected for excessive smoke and tampering, and engine certification label compliance. Any heavy-duty vehicle traveling in California, including vehicles registered in other states and foreign countries, may be tested. Tests are performed by CARB inspection teams at border crossings, CHP weigh stations, fleet facilities, and randomly selected roadside locations. Owners of trucks and buses found in violation are subject to minimum penalties starting at $300 per violation. Also, the new HD I/M program, which started in January 2023, requires truck owners to take their truck into a certified inspector to verify that the emissions meet the 2010 engine standards, and to make sure the emission systems are running properly. The owner then must report the results to DMV. If the owner fails to do so, there will be hold on that truck's registration at DMV. HDVIP stemmed from the Periodic Smoke Inspection Program regulation, which was enforced up until this year.

HDVIP-Diesel Exhaust Fluid: The 2010 and newer model year engines equipped with selective catalytic reduction technology use a liquid urea solution to meet emission standards. The liquid urea is commonly known as diesel exhaust fluid (DEF). This program inspects the DEF tank levels to confirm proper usage.

HDVIP-Emission Control Label: Several CARB diesel regulations require specific engine information, such as engine model year and engine family name, which is available from the emission control label (ECL) that is attached to your vehicle. All heavy-duty vehicles must have the ECL properly affixed on the engine. The ECL must be legible, maintained at the location originally installed by the engine manufacturer, and correspond to the engine serial number stamped on the engine.

HDVIP-Smoke Opacity: All heavy-duty diesel-powered vehicles must meet the applicable model year opacity standards with higher standards required for vehicles with diesel particulate filters installed.

HDVIP-Tampering: CARB enforces against vehicle owners (consumers) that have violated the law by tampering, modifying, or installing illegal parts on emission-controlled vehicles operated on a public highway.

Idling: Idling and opacity inspections are performed to ensure a heavy-duty vehicle (HDV) is compliant with emission standards and is not violating CARB's Idling regulation. Idling for more than five minutes is prohibited unless the HDV is certified clean idle, and the vehicle is more than 100 feet away from a school or restricted area (exceptions apply). Vehicle owners and

drivers in violation are subject to minimum penalties starting at $300 per violation and up to $1000 per day.

Off-Road Construction Equipment (Off-Road Regulation): Construction equipment is a major contributor to air pollution, especially when large construction projects are adjacent to neighborhoods. To address this source of air pollution, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. The off-road regulation requires off-road fleets to meet fleet average emission standards and be equipped with Best Available Control Technology (a few specific exceptions apply).

Smart Way: The Tractor-Trailer Greenhouse Gas Regulation requires 53-foot or longer dry van or refrigerated van trailers and the tractors that pull them on California highways to use certain equipment that the U.S. Environmental Protection Agency Smart Way program has verified or designated to meet their efficiency standards.

Statewide Truck and Bus: The Statewide Truck and Bus regulation requires diesel trucks with a Gross Vehicle Weight Rating (GVWR) greater than 14,000 pounds that operate in California to install diesel particulate filters or replace older engines with cleaner engine technology on a schedule based on the model year of the engine and GVWR.

Transport Refrigeration Unit: Transport Refrigeration Units (TRUs) are refrigeration systems powered by diesel internal combustion engines designed to refrigerate or heat perishable products that are transported in various containers, including semi-trailers, truck vans, shipping containers, and rail cars. Since diesel particulate matter has been identified as a toxic air contaminant, CARB adopted an Airborne Toxic Control Measure for TRUs and TRU generator sets. CARB staff inspect TRUs to ensure that the units are meeting labeling and in-use performance standards identified in the TRU regulation.

Consumer Goods Program

Composite Wood Products: CARB’s Airborne Toxic Control Measure to control formaldehyde emissions from composite wood specifically focuses on three products: hardwood plywood, particleboard, and medium density fiberboard. Investigators in the Composite Wood Products program purchase samples of regulated products from outlets all over California. They inspect products and packaging for compliance with labeling requirements and send selected products to the laboratory for testing.

Consumer Products: Consumer Products are chemically formulated products used by household and institutional consumers. Some examples are detergents, cleaning compounds; polishes, floor finishes; cosmetics and personal care products; home, lawn, and garden products; disinfectants and sanitizers; aerosol paints and automotive specialty products. Consumer Products do not include other paint products, furniture coatings, or architectural coatings. Investigators in the Consumer Products program purchase samples of regulated consumer products from outlets all over California. They inspect product containers for compliance with registration and dating requirements and send selected products to the laboratory for testing.

Motor Vehicle Fuels Enforcement Program Description:

CARB's Motor Vehicle Fuels Enforcement program is the inspection of California gasoline and diesel fuel at production, transport, and dispensing facilities. CARB Fuels Inspectors conduct frequent, unannounced inspections of refineries, service stations, distribution and storage, bulk purchaser, and consumer facilities throughout the State to obtain samples of gasoline and diesel fuels. The samples are then analyzed in the Mobile Fuels Laboratory. The laboratory analyzes gasoline fuel for vapor pressure, distillation temperatures, total aromatics, olefins, and oxygen, benzene, and sulfur contents. Diesel fuel is analyzed for sulfur, aromatic hydrocarbon content, and polynuclear aromatic hydrocarbon content.

Other Mobile Enforcement Program Descriptions:

HFC-134a Refrigerant: This regulation applies to the sale, use, and disposal of small containers of automotive refrigerant with a Global Warming Potential value greater than 150. The regulation achieves emission reductions through implementation of four requirements: 1) use of a self-sealing valve on the container, 2) improved labeling instructions, 3) a deposit and recycling program for small containers, and 4) an education program that emphasizes best practices for vehicle recharging. This regulation went into effect on January 1, 2010, and has been improved through amendments over the years. The latest amendment to the regulation was approved on April 13, 2017.

Dealer and Fleet Tampering: CARB enforces against any manufacturer, wholesaler, distributor, dealer, installer, retailer and/or repair shop or facility if they offered for sale or sold an uncertified vehicle, an illegally modified vehicle, or an illegal part, or installed an illegal part on an emission-controlled vehicle that is operated on a public highway. In addition, CARB enforces against commercial fleets that operate vehicles in violation of the law through tampering, modifying, or installing illegal parts on emission-controlled vehicles.