



**AB 617 Community Air Protection Program
Steering Committee Meeting Agenda
Zoom Online Meeting**



**Comite Civico
Del Valle, Inc.**

MEETING AGENDA

Wednesday, November 9, 2022

5:30 p.m. – 7:30 p.m.

Facilitator: Harder+Co.

Chair of Meeting: Luis Olmedo (Alternate: Christian Torres)

Members of the public may connect to this meeting on Zoom from a PC, Mac, iPad, iPhone, or Android device by clicking the following link to join:

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WELCOME

- 1. Roll Call/Opening Remarks by CSC Members** **Co-Chairs**

- 2. PUBLIC COMMENT PERIOD** **Harder+Co.**
Members of the public may submit comments via Facebook livestream, email, or using the raise hand Zoom feature (for those calling from the Zoom app you can select the raise hand feature, and for those calling by telephone can dial *9). Comments are to be limited to no more than 2 minutes per person.

- 3. APPROVAL OF MINUTES** **Co-Chairs**
Review and approval of Minutes of September 14, 2022 CSC Meeting.
(Attachment: [September 14, 2022 Minutes](#))

- 4. PRESENTATIONS:**
 - A. High Wind Exceptional Event Fugitive Dust Mitigation Plan** **ICAPCD**
ICAPCD will provide an update on the changes of the High Wind Exceptional Event Fugitive Dust Mitigation Plan.
(Attachment: [High Wind EE Fugitive Dust Mitigation Plan](#))

 - B. AB 617 CAMP – Community Air Monitoring Network Update** **CCV**
CCV will provide an update on new monitors and preliminary analysis on AB 617 community air monitors.
(Attachment: [November 2022 CAMN Update](#))

 - C. Regional Trends** **UC Davis**
UC Davis will provide an update on Regional Trends on AB 617 community air monitors.
(Attachment: [Regional Trends IC – UC Davis](#))



**AB 617 Community Air Protection Program
Steering Committee Meeting Agenda
Zoom Online Meeting**



**Comite Civico
Del Valle, Inc.**

5. DISCUSSION/INFORMATION ITEMS

A. Update of ICAPCD Policies

ICAPCD

Imperial County Air Pollution Control District (ICAPCD) will provide an update on Air District Policies 16 and 16A.

(Attachments: [ICAPCD P16](#), [ICAPCD P16A](#))

6. AGENCY UPDATES

ICAPCD & CCV

7. AGENDA TOPICS & SET DATE FOR NEXT MEETING

Co-Chairs

Discuss and schedule the next CSC meeting tentative for December 14, 2022.

8. CLOSING REMARKS/ADJOURNMENT

Co-Chairs



AB 617 Programa de Protección del Aire Comunitario

Agenda de la reunión del comité directivo

Reunión en línea vía Zoom



Comite Civico
Del Valle, Inc.

AGENDA DE LA REUNIÓN

Miércoles, 9 de Noviembre de 2022

5:30 p.m. – 7:30 p.m.

Facilitador: Harder+Co.

Presidente de la reunión: Luis Olmedo (Suplente: Christian Torres)

Los miembros del público pueden conectarse a esta reunión en Zoom desde una PC, Mac, iPad, iPhone o dispositivo Android haciendo clic en el siguiente enlace para unirse:

bit.ly/617CSC

ID de la reunión: 991-9909-3212

Código de acceso: 490172

Para unirse por teléfono, marque: 1-669-900-6833 e ingrese ID de la reunión: 991-9909-3212 y el código de acceso: 490172. Para obtener más información, visite www.icab617community.org.

BIENVENIDOS

1. **PASE DE LISTA/PALABRAS DE APERTURA DE LOS MIEBROS DEL CSC** **Copresidentes**

2. **PERÍODO DE COMENTARIOS PÚBLICOS** **Harder+Co**
Los miembros del público pueden enviar comentarios a través de transmisión en vivo de Facebook, correo electrónico o usando la función Zoom de levantar la mano (para aquellos que llamen desde la aplicación Zoom, pueden seleccionar la función de levantar la mano, y para aquellos que llamen por teléfono, pueden marcar * 9). Los comentarios deben limitarse a no más de 2 minutos por persona.

3. **APROBACIÓN DE LAS MINUTAS** **Copresidentes**
Revisión y aprobación de la minuta de la reunión del CSC del 14 de septiembre de 2022.
(Adjunto: [Minutas del 14 de septiembre de 2022](#))

4. **PRESENTACIONES**
 - A. **Evento Excepcional de Vientos Fuertes Plan de Mitigación de polvo fugitivo** **ICAPCD**
ICAPCD proporcionará una actualización sobre los cambios del Plan de Mitigación de Polvo Fugitivo de Eventos Excepcionales de Vientos Fuertes.
(Adjunto: [Plan de Mitigación de Polvo Fugitivo EE para Vientos Fuertes](#))

 - B. **AB 617 CAMP – Actualización de la Red de Monitoreo del Aire Comunitario** **CCV**
CCV proporcionará una actualización sobre los nuevos monitores y un análisis preliminar de los monitores de aire comunitario AB 617.
(Adjunto: [Actualización CAMN de Noviembre de 2022](#))



AB 617 Programa de Protección del Aire Comunitario
Agenda de la reunión del comité directivo
Reunión en línea vía Zoom



**Comite Civico
Del Valle, Inc.**

C. Tendencias Regionales

UC Davis

UC Davis proporcionará una actualización sobre las tendencias regionales en los monitores de aire de la comunidad AB 617.

(Adjunto: [Tendencias Regionales IC – UC Davis](#))

5. PUNTOS DE DISCUSIÓN/INFORMACIÓN

A. Actualización de las Pólizas de ICAPCD

ICAPCD

El Distrito de Control de la Contaminación del Aire del Condado de Imperial (ICAPCD) proporcionará una actualización de las Pólizas del Distrito del Aire 16 y 16A.

(Adjunto: [ICAPCD P16](#), [ICAPCD P16A](#))

6. ACTUALIZACIONES DE LAS AGENCIAS

ICAPCD & CCV

7. TEMAS DE LA AGENDA Y FIJAR FECHA PARA LA PRÓXIMA REUNIÓN

Copresidentes

Discutir y programar la próxima reunión del CSC tentativa para el 14 de Diciembre de 2022.

8. OBSERVACIONES DE CLAUSURA/CIERRE

Copresidentes

**3. Minutes:
September 14, 2022
CSC Meeting**

**AB 617 Community Air Protection Program
Minutes of the Steering Committee Meeting
Zoom Online Meeting
September 14th, 2022**

Chair of Meeting: Belén Leon (Alternate: Christian Torres)

Facilitator: Daniela Flores from Harder & Company

I. Attendance:

Primaries: ; **Belen Leon**, Air Pollution Control District; **Mercedes Martinez**, Community Corridor; **Rene Felix**, Community Corridor; **Kristian Salgado**, Community Corridor; **Blake Plourd**, Community Corridor; **Sergio Cabañas**, Community Corridor; **Mary Salazar**, Community Corridor; **John Hernandez**, Community Corridor.

Alternates: **Christian Torres**, Comité Cívico del Valle; **Rosa Guerrero**, Community Corridor; **Bob Fischer**, Community Corridor; **Chris Gomez-Wong**, Community Corridor; **Michael Moore**, Community Corridor; **Marlene Flores**, Community Corridor.

Other Agency Staff: **Marco Perrone**, Air Pollution Control District; **Thomas Brinkerhoff**, Air Pollution Control District; **Edgar Ruiz**, Comité Cívico del Valle; **Cynthia Ortiz**, California Air Resources Board; **Andrea Juarez**, California Air Resources Board; **Juan Ramon De La Rama**, California Air Resources Board; **Linda Cedillo**, California Air Resources Board.

I. Welcome and Opening Remarks by CSC Members

Daniela Flores introduced herself and mentioned **Jessica Silva** and **Madeline Rayon** would be assisting anyone that needed help. She mentioned how everyone can submit their comments and how the public comment procedure works. She commented they have interpretation services and how to access this service through the platform. She reminded everyone that the meeting is being recorded and also mentioned how the CSC members can access the agenda packet.

Belén Leon mentioned **Matt Dessert** retired last month and that she was selected to be the APCO. She said she was excited and ready to work with everyone.

Christian Torres congratulated **Belén Leon** for becoming the APCO. He commented he missed not being able to have the meeting in person.

Belén Leon mentioned there were some issues with the facility where they were going to have the meeting.

II. Public Comment Period

Mary Salazar mentioned she's been receiving phone calls about the retention basins that have been converted to sports fields that are filled with water. She said everyone is concerned about making sure their voices are heard. She commented it shouldn't be ignored because it's a problem that won't go away.

Belén Leon said they should call the Environmental Health Department. She mentioned she'll link their contact information in the chat.

Daniela Flores on behalf of the entire Harder Company team congratulated **Belen Leon** for her leadership. She mentioned they were deeply committed to continuing to work as a team.

Belén Leon thanked **Daniela Flores** and everyone else who congratulated her.

III. Approval of Minutes

Bob Fischer motioned to approve the minutes from July 13th, 2022.

Sergio Cabañas seconded the motion.

The motion was passed.

IV. Presentations

Update of ICAPCD Policies, Thomas Brinkerhoff; APCD.

There was no discussion regarding this item.

Community Air Monitoring Update, Edgar Ruiz; CCV.

Blake Plourd asked what CAL is used in each category.

Christian Torres asked if **Blake Plourd** could be more specific with his question.

Blake Plourd asked what was low-risk or unhealthy in the graphs they showed.

Christian Torres mentioned the range for each CAL is 50 counts. He said 0 to 50 is green, 50 to 100 is yellow, and 150 & above is red. He commented they've used the same colors since the launch of the IVAN program. He said they have a more in-depth explanation in the FAQ section on their website.

Belen Leon suggested adding the ranges next to the graphs.

An AB 617 member asked what was the location of the monitor that was causing issues.

Edgar Ruiz said it's the monitor on Imperial Avenue in Calexico. He commented that it is online because it has a blown fuse. He mentioned that they are waiting for the part to arrive.

Belén Leon asked how many monitors are installed.

Edgar Ruiz commented that they have all 15 monitors installed.

AQ View Status Update, Taylor Helgestad; CARB

Christian Torres asked how many communities have been starting to upload to the platform.

Taylor Helgestad mentioned they're collecting data from multiple counties and also pulling data from places that have low-cost sensors. He said they're working with tribal communities to send them their data.

Marco Peroni asked if CARB was working on making the website more interactive.

Taylor Helgestad said their next phase will include a real-time map and a time series tool which will be highly interactive.

V. Discussion / Information Items

Update on the Committee Membership / Charter; ICAPCD

John Hernandez asked what the life span of the committee looked like.

Belén Leon said the budget will be discussed in the next month's meeting. She said the committee was in existence for almost 5 years and that they still have funding left. She mentioned they'll keep on going for the time being. She commented she'll try and get a definite answer from CARB.

Update on CERP Survey, Daniela Flores; Harder + Co & ICAPCD.

Belén Leon asked if the remaining 30% of members that haven't done the survey were the ones that are inactive.

Daniela Flores mentioned it was a bit higher because they weren't counting the resignation notification. She said they were for 3 people to take the survey.

Belén Leon commented the survey was to see where everyone's interests were for future projects. She said one of the suggested projects was electrical infrastructure at the ports. She mentioned they will be bringing the survey back for next month's meeting.

VI. Agency Updates

Sandra Wynn gave an update on CARB's Incentive Program Advisory Group.

Belén Leon mentioned they will be giving baggies and loterias for Mexican Independence Day.

Christian Torres commented to be on the lookout for EG Summit information. He invited CSC members to participate in a CARB research project that aims to find research priorities in the Imperial Valley.

Belén Leon mentioned they're having an AQTF summit in Mexicali on September 27th and 28th. She commented they will be sending out emails.

Daniela Flores said the faculty that **Christian Torres** mentioned provides classes around public & environmental health.

VII. Agenda Topics & Set Date For Next Meeting.

Bob Fischer made a motion to have the September meeting on the 14th.

Michael Moore seconded the motion.

The motion passed.

Belén Leon mentioned the meeting being in person is to be determined. She commented there was a possibility that the next meeting would have different CSC members and thanked everyone for being a part of the team.

Andrea Juarez answering **John Hernandez's** comment said the timeline of the committee was 1 year for the creation of the CERP with 5 years for implementation and another 5 optional years.

VIII. Closing Remarks / Adjournment

Christian Torres thanked everyone for participating.

Belén Leon commented she hopes everyone still wants to be a member. She thanked everyone for attending.

Meeting adjourned.

Programa Comunitario de Protección Atmosférica Bajo el Auspicio del Proyecto de Ley AB 617
Minuta de la Reunión del Comité Directivo
Junta por la plataforma Zoom
14 de septiembre del 2022

Presidente de la Reunión: Belén Leon (Suplente: Christian Torres)

Facilitador: Daniela Flores de Harder & Company

I. Asistencia:

Primarias: **Belen Leon**, Distrito de Control de la Contaminación del Aire; **Mercedes Martinez**, Corredor Comunitario; **René Félix**, Corredor Comunitario; **Sergio Cabañas**, Corredor Comunitario; **Blake Plourd**, Corredor Comunitario; **Mary Salazar**, Corredor Comunitario; **John Hernandez**, Corredor Comunitario; **Kristian Salgado**, Corredor Comunitario.

Suplentes: **Christian Torres**, Comité Cívico del Valle; **Rosa Guerrero**, Corredor Comunitario; **Bob Fischer**, Corredor Comunitario; **Chris Gomez-Wong**, Corredor Comunitario; **Michael Moore**, Corredor Comunitario; **Marlene Flores**, Corredor Comunitario.

Otro personal de la agencia: **Thomas Brinkerhoff**, Distrito de Control de la Contaminación del Aire; **Marco Perrone**, Distrito de Control de la Contaminación del Aire; **Andrea Juarez**, Junta de Recursos del Aire de California; **Cynthia Ortiz**, Junta de Recursos del Aire de California; **Linda Cedillo**, Junta de Recursos del Aire de California; **Juan Ramon De La Rama**, Junta de Recursos del Aire de California.

I. Bienvenida y discurso de Apertura de los Miembros del CSC

Daniela Flores se presentó y mencionó que **Jessica Silva** y **Madeline Rayon** ayudarían a cualquiera que necesitara ayuda. Mencionó cómo todos pueden enviar sus comentarios y cómo funciona el procedimiento de comentarios públicos. Comentó que cuentan con servicios de interpretación y cómo acceder a este servicio a través de la plataforma. Les recordó a todos que la reunión se está grabando y también mencionó cómo los miembros del CSC pueden acceder al paquete de la agenda.

Belén León mencionó **Matt Dessert** se retiró el mes pasado y que fue seleccionada para ser la APCO. Dijo que estaba emocionada y lista para trabajar con todos.

Christian Torres felicitó a **Belén León** por convertirse en APCO. Comentó que extrañaba tener la reunión en persona.

Belén León mencionó que hubo algunos problemas con las instalaciones donde iban a tener la reunión.

II. Comentario Públicos

Mary Salazar mencionó que ha estado recibiendo llamadas telefónicas sobre los estanques de retención que se han convertido en campos deportivos llenos de agua. Dijo que todos están preocupados por asegurarse de que sus voces sean escuchadas. Comentó que no debe ignorarse porque es un problema que no desaparecerá.

Belén León dijo que deberían llamar al Departamento de Salud Ambiental. Mencionó que vinculará su información de contacto en el chat.

Daniela Flores en nombre de todo el equipo de Harder Company felicitó a **Belén León** por su liderazgo. Mencionó que estaban profundamente comprometidos a seguir trabajando en equipo.

Belén León agradeció a **Daniela Flores** y a todos los que la felicitaron.

III. Aprobación de Minutas

Bob Fischer hizo la moción de aprobar las minutas del 13 de julio de 2022.

Sergio Cabañas secundó la moción.

La moción fue aprobada.

IV. Presentaciones

Actualización de Políticas del ICAPCD, Thomas Brinkerhoff; APCD.

No hubo discusión sobre este tema.

Actualización de Monitoreo del Aire Comunitario, Edgar Ruiz; CCV.

Blake Plourd preguntó qué CAL se usa en cada categoría.

Christian Torres preguntó si **Blake Plourd** podría ser más específico con su pregunta.

Blake Plourd preguntó qué era de bajo riesgo o no saludable en los gráficos que mostraban.

Christian Torres mencionó que el rango para cada CAL es de 50 conteos. Dijo que 0 a 50 es verde, 50 a 100 es amarillo y 150 y más es rojo. Comentó que han usado los mismos colores desde el lanzamiento del programa IVAN. Dijo que tienen una explicación más detallada en la sección de preguntas frecuentes en su sitio web.

Belén León sugirió agregar los rangos al lado de los gráficos.

Un miembro de AB 617 preguntó cuál era la ubicación del monitor que estaba causando problemas.

Edgar Ruiz dijo que es el monitor que esta entre Imperial Avenue en Calexico. Comentó que no esta prendido porque se fundió un fusible. Mencionó que están en espera de que llegue la parte.

Belén León preguntó cuántos monitores hay instalados.

Edgar Ruiz comentó que tienen todos los 15 monitores instalados.

Actualización AQ View, Taylor Helgestad; CARB

Christian Torres preguntó cuántas comunidades han comenzado a subir información a la plataforma.

Taylor Helgestad mencionó que están recopilando datos de varios condados y también extrayendo datos de lugares que tienen sensores de bajo costo. Dijo que están trabajando con las comunidades tribales para enviarles sus datos.

Marco Perrone preguntó si CARB estaba trabajando para hacer que el sitio web fuera más interactivo.

Taylor Helgestad dijo que su próxima fase incluirá un mapa en tiempo real y una herramienta de serie temporal que será altamente interactiva.

V. Temas de Discusión / Información

Actualización sobre la Membresía/Estatuto del Comité; ICAPCD

John Hernandez preguntó cómo sería la vida útil del comité.

Belén León dijo que el presupuesto se discutirá en la reunión del próximo mes. Dijo que el comité existió durante casi 5 años y que todavía les quedaban fondos. Mencionó que continuarán por el momento. Comentó que intentará obtener una respuesta definitiva de CARB.

Actualización Encuesta CERP, Daniela Flores; Harder + Co & ICAPCD.

Belén León preguntó si el 30% restante de los miembros que no han hecho la encuesta son los que están inactivos.

Daniela Flores mencionó que fue un poco más alto porque no estaban contando la notificación de renuncia. Dijo que faltaban 3 personas de tomar la encuesta.

Belén León comentó que la encuesta era para ver dónde estaban los intereses de todos para proyectos futuros. Dijo que uno de los proyectos sugeridos era la infraestructura eléctrica en los puertos. Mencionó que traerán la encuesta para la reunión del próximo mes.

VI. Actualizaciones de las Agencias

Sandra Wynn dio una actualización sobre el Grupo Asesor del Programa de Incentivos de CARB.

Belén León mencionó que estarán regalando bolsitas y loterías por el Día de la Independencia de México.

Christian Torres comentó estar al pendiente de la información del EG Summit. Invitó a los miembros del CSC a participar en un proyecto de investigación de CARB que tiene como objetivo encontrar prioridades de investigación en el Valle Imperial.

Belén León mencionó que tendrán una cumbre AQTF en Mexicali el 27 y 28 de septiembre. Comentó que estarán enviando correos electrónicos.

Daniela Flores dijo que la facultad que **Christian Torres** mencionó brinda clases sobre salud pública y ambiental.

VII. Temas de la Agenda y Fecha para la Próxima Reunión.

Bob Fischer hizo la moción de tener la reunión de septiembre el 14.

Michael Moore secundó la moción.

La moción pasó.

Belén León mencionó que está por determinarse que la reunión sea presencial. Comentó que existía la posibilidad de que la próxima reunión tuviera diferentes miembros del CSC y agradeció a todos por ser parte del equipo.

Andrea Juarez respondiendo al comentario de **John Hernandez** dijo que el cronograma del comité era de 1 año para la creación del CERP con 5 años para la implementación y otros 5 años opcionales.

VIII. Observaciones Finales / Clausura

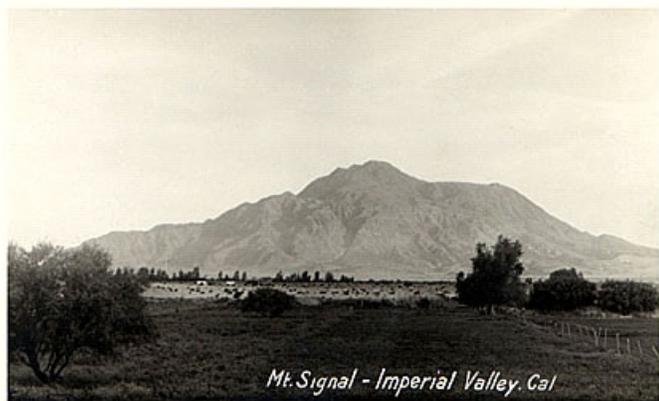
Christian Torres agradeció a todos por participar.

Belén León comentó que espera que todos todavía quieran ser miembros. Agradeció a todos por asistir.

Se levanta la sesión.

4. Presentations:

A. High Wind Exceptional Event Fugitive Dust Mitigation Plan (ICAPCD)



Black and White Postcard Published by the Barbara Worth Hotel-Allan McCollum; <http://allanmccollum.net/amcimages/mtsignal13.jpeg>

HIGH WIND EXCEPTIONAL EVENT FUGITIVE DUST MITIGATION PLAN

For Imperial County

SUMMARY

In keeping with the Air District's mission to protect the public health and consistent with the principles of the Clean Air Act the Imperial County Air Pollution Control District has prepared a mitigation plan to help address historically documented and known seasonal high wind events

Imperial County Air Pollution Control District
Planning Division



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II.1	Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours. [40 CFR 51.930(b)(2)(i)]	10
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I INTRODUCTION

I.1 Purpose

In keeping with the United States Environmental Protection Agency's (US EPA) final rulemaking for the "Treatment of Data Influenced by Exceptional Events", published October 3, 2016, areas with "known seasonal" or "historically documented" exceptional events are required to develop and implement a Mitigation Plan, codified as Title 40 of the Code of Federal Regulations (CFR) section 51.930 (40 CFR 51.930)

When States request the exclusion of air quality data due to an exceptional event the States must take appropriate and reasonable actions to protect the public health from exceedances or violations of the National Ambient Air Quality Standards (NAAQS). At a minimum, a State must:

- Provide for prompt public notification whenever air quality concentrations exceed or are expected to exceed an applicable ambient air quality standard.
- Provide for public education concerning actions that individuals may take to reduce exposures to unhealthy levels of air quality during and following an exceptional event.
- Provide for the implementation of appropriate measures to protect public health from exceedances or violations of ambient air quality standards caused by exceptional events.

The Imperial County Air Pollution Control District (ICAPCD) has prepared this "High Wind Exceptional Event Fugitive Dust Mitigation Plan" for the Particulate Matter Less than 10 microns (PM₁₀) nonattainment area for Imperial County.

I.2 Exceptional Events Rule Revisions

The earliest guidance issued by the US EPA regarding the exclusion of ambient PM₁₀ air quality data known as the natural event policy occurred in May of 1996. The policy represented the US EPA's interpretation of the Clean Air Act Section 188(f) and Appendix K of 40 CFR, Part 50. Imperial County adopted its Natural Events Action Plan August 9, 2005.

As a response to stakeholder concerns on March 22, 2007, the US EPA adopted the "Treatment of Data Influenced by Exceptional Events Rule" (Exceptional Events Rule) to govern the review and handling of certain air quality monitoring data for which the normal planning and regulatory processes are not appropriate. Under the terms of the rule, the US EPA may exclude monitored exceedances of the NAAQS if a State adequately demonstrates that an exceptional event caused the exceedance. While the 2007 Exceptional Events Rule required States to take reasonable measures to mitigate the impacts of an exceptional event the rule did not require States to submit their identified measures to the US EPA or to notify the US EPA of the measures a State planned to take.

The 2007 and 2016 revised Exceptional Events Rule added sections 40 CFR §50.1(j)-(r) [Definitions], 50.14(a)-(c) and 51.930(a)-(b) to 40 CFR. These sections contain definitions, criteria for US EPA concurrence, procedural requirements and requirements for State demonstrations. The demonstration must satisfy all of the rule criteria for US EPA to concur with the requested exclusion of air quality data from regulatory decisions.

Title 40 CFR §50.14(c)(3)(iv) outlines the elements that a demonstration must include for air quality data to be excluded:

- "A narrative conceptual model that describes the event(s) causing the exceedance or violation and a discussion of how emissions from the event(s) led to the exceedance or violation at the affected monitor(s);"
- "A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation;"
- "Analyses comparing the claimed event-influenced concentration(s) to concentrations at the same monitoring site at other times" to support the requirement above;
- "A demonstration that the event was both not reasonably controllable and not reasonably preventable;" and
- "A demonstration that the event was a human activity that is unlikely to recur at a particular location or was a natural event."

Aside from the above, a State must demonstrate that it has met several procedural requirements during the demonstration process, including:

- 1 Submission to the Administrator of an Initial Notification of Potential Exceptional Event and flagging of the affected data in US EPA's Air Quality System (AQS) as described in 40 CFR §50.14(c)(2)(i),



- 2 Documentation of fulfillment of the public comment process described in 40 CFR §50.14(c)(3)(v), and
- 3 Implementation of any applicable mitigation requirements (Mitigation Plan) as described in 40 CFR §51.930.

I.3 Fugitive Dust – Particulate Matter Less than 10 Microns (PM₁₀)

PM₁₀ refers to particles with an aerodynamic diameter of 10 microns or smaller. For comparison, the diameter of a human hair is about 50 to 100 microns. Exposure to PM₁₀ aggravates a number of respiratory illnesses and may even cause early death in people with existing heart and lung disease. PM₁₀ includes the subgroup of finer particles with aerodynamic diameter of 2.5 microns and smaller (PM_{2.5}). These finer particles pose an increased health risk because they can deposit deep in the lung and contain substances that are particularly harmful to human health. PM is a mixture of substances that include elements such as carbon and metals; compounds such as nitrates, organic compounds, and sulfates; and complex mixtures such as diesel exhaust and dust. These substances may occur as solid particles or liquid droplets. Some particles emitted directly into the atmosphere include dust. Others, referred to as secondary particles, result from the transformation of gases into particles through physical and chemical processes in the atmosphere.

I.4 Geographical Description

According to the United States Census Bureau, Imperial County has a total area of 4,482 square miles, of which 4,177 square miles is land and 305 square miles is water. Much of Imperial County is below sea level and is part of the Colorado Desert an extension of the larger Sonoran Desert. Bordered by San Diego County to the west, Riverside County to the north, Arizona to the east and Mexico to the south, Imperial County is comprised of seven incorporated cities, including the unincorporated township of Niland that are surrounded by agricultural lands. Combined these cities and agricultural lands make up Imperial Valley (**Figure 1-1**).

Surrounding the Imperial Valley to the west, east, north and south are naturally open desert areas, the Salton Sea to the north, the Chocolate Mountains to the east, distinctive mountain ranges along the San Diego/Imperial County borderline, and to the south the metropolitan city of Mexicali, Mexico with a population over a million.

Several geological aspects from within and outside of Imperial County affect air quality. The region along the Chocolate Mountains within the eastern section of Imperial County



is dominated by the transition of the tectonic plate boundary from rift to fault. The southernmost strands of the San Andreas Fault connect the northern-most extensions of the East Pacific rise. Consequently, the region is subject to earthquakes and the crust is being stretched, resulting in a sinking of the terrain over time.

The distinctive regions along the southeastern and southwestern portions of the San Diego/Imperial County borderline include the distinctive peninsular mountain ranges, which comprise the eastern two-thirds of San Diego County and are primarily undeveloped backcountry with a native plant community known as chaparral. The In-Ko-Pah Mountains and the Jacumba Mountains border Mexico and Imperial County and provide distinctive weathered dramatic piles of residual boulders. The Anza-Borrego Desert State Park contains characteristically erosive regions, such as sand dunes, that extend from the Santa Rosa Mountains into northern Baja California in Mexico. Some of the regions included within the Anza-Borrego Desert State Park are the Vallecito Mountains, the Carrizo Badlands and the Coyote Mountains. Much of the terrain is loose dirt, interspersed with sandstone and occasional quartz veins. In all, the Anza-Borrego Desert State Park lies in a unique geologic setting along the western margin of the Salton Trough. The area extends north from the Gulf of California (Baja California) to San Geronimo Pass and from the eastern rim of the Peninsular Ranges eastward to the San Andreas Fault zone along the far side of the Coachella Valley.

These areas are sources of transported fugitive dust emissions into Imperial County when westerly winds funnel through the unique landforms causing in some cases wind tunnels that cause increase in wind speeds. During the monsoonal season, natural open desert areas to the east, southeast, and south of Imperial County are sources of transported fugitive dust emissions when thunderstorms cause outflows to blow winds across natural open desert areas within Arizona and Mexico.

~~[Intentionally left blank]~~

**FIGURE 1-1
IMPERIAL COUNTY**



Fig 1-1: Imperial County a Southern California border region, within far southeast California bordering Arizona and Mexico has a small most economically diverse region with a population of 174,528

[Intentionally left blank]



which includes a portion of San Diego County.

The west coast Peninsular Ranges, or other west ranges, of Southern California–northern Baja California, block most eastern Pacific coastal air and rains, producing an arid climate. Other short or longer-term weather events can move in from the Gulf of California to the south, and are often active in the summer monsoons. These include remnants of Pacific hurricanes, storms from the southern tropical jet stream, and the northern Inter Tropical Convergence Zone (ITCZ).

The combination of meteorology and topography create the ideal conditions for the transport and trapping of particulates. The bowl like topography, created by the below sea level elevation, allows the eroding mountain ranges and the expansive natural open desert areas within the counties of San Diego, Riverside, Arizona and Mexico to transport fugitive dust into Imperial County during windy days either from the west or from outflows created by thunderstorms from the south, and southeast.

1.6 Imperial County High Wind Event Meteorology

Analysis of high wind events, resulting in elevated PM₁₀ concentrations, in Imperial County during the fall, winter, and spring are often due to strong winds associated with low-pressure systems and cold fronts. During the summer monsoon season, elevated PM₁₀ concentrations are often due to wind flow aloft from the East or Southeast, known as the North American Monsoon (NAM)¹. The NAM occurs when there is a shift in wind patterns during the summer, which occurs as Mexico and the southwest United States warm under intense solar heating reversing airflow from dry land areas to moist ocean areas. Consequently, the prevailing winds start to flow from moist ocean areas into dry land areas.

Historical analysis have defined meteorological mechanisms that lead to high wind elevated PM₁₀ events in Imperial County and they include:

- **Type 1:** Pacific storms and frontal passages;
- **Type 2:** Strong pressure and surface pressure gradients;
- **Type 3:** Monsoonal Gulf Surges from Mexico; thunderstorm downburst, outflow winds and gust fronts from thunderstorms
- **Type 4:** Santa Ana wind events

¹ National Weather Service document “North American Monsoon” public domain material from the NWS Forecast Office Tucson, Arizona Wikipedia, North American Monsoon, Last revised October 7, 2022, https://en.wikipedia.org/wiki/North_American_monsoon

Type 1 events, the passage of storm systems, create strong winds through the mountain passes and desert slopes. As the frontal system passes, surface wind shifts causing increases in wind speeds. Although these storms often produce little to no precipitation winds blow along the desert slopes at much high speeds, such as 60 mph while winds on the desert floor reduce but remain elevated, such as 50 mph. The impressive dust plumes are typically captured by Satellite and can be seen traveling from the mountains beyond Imperial County. During these events, the National Weather Service (NWS) San Diego office often issues wind advisories for the San Diego Mountains and deserts, typically advising of reduced visibility due to blowing dust along Interstate 8, the Coachella Valley and other desert communities within the San Diego service area. The winds are associated with a dynamic, fast-moving winter, spring or fall storm. Cold fronts, dry or wet, often accompany the weather system.

Type 2 events occur far more frequently than other wind events. They are responsible for the majority of the exceptional event episodes in Imperial County. These wind events occur when a low-pressure system moves inland from the Pacific Ocean. This can be an upper level trough moving inland over central-southern California, or sliding down from the Pacific Northwest into the Great Basin and extending southward into southern California. In either occurrence, the surface gradient tightens, producing a strong onshore flow and generating strong gusty westerly winds across the deserts and mountains of southeastern California. In many instances, **Type 1** and **Type 2** meteorological conditions can combine causing very strong winds in Imperial County. Much like **Type 1** events, the NWS office in San Diego typically issues wind advisories for the San Diego Mountains and deserts.

Type 3 are strong easterly-to-southerly winds produced by thunderstorm outflows. Triggering these outflows are monsoonal air masses (Gulf Surge) that move northward out of Mexico. The warm, moist air from the Gulf of Mexico spills into the southwest United States and promotes instability in the atmosphere. This convective activity produces thunderstorms in the atmosphere, which generates strong winds from outflow boundaries (gust fronts). Fast-moving outflows can and do reach Imperial County when thunderstorms combine within Arizona or Northern Mexico. Thunderstorm complexes that occur during the NAM in the desert southwest can produce dust storms called "haboobs" that are so intense that they look like a wall of dust moving across the landscape.

Type 4 events are Santa Ana wind events. They are the least common. These events occur when high pressure and cold temperatures over the Great Basin create northerly or northeasterly winds. Typically, the stronger Santa Ana winds occur at higher elevations to the north of Imperial County. However, occasionally the dynamics of the strong northerly



winds race across the high desert (Mojave Desert) where blowsand is transported into the bowl-like depression of Imperial County elevating PM₁₀ levels. Type 3 events typically occur during November through January.

I.7 ~~PM₁₀ Non-Attainment Status~~ [Imperial County PM₁₀ Fugitive Dust Rules](#)

The US EPA issued its final ruling to the “Revisions to the National Ambient Air Quality Standards for Particulate Matter” on July 1, 1987. The final ruling took three decisive actions. First, it replaced Total Suspended Particulate Matter (TSP) as an indicator for particulate matter for the ambient standards with PM₁₀. Second, it replaced the 24-hour primary TSP standard with a 24-hour PM₁₀ standard of 150 micrograms per cubic meter (µg/m³) with no more than one expected exceedance per year. Third, the final ruling replaced the annual primary TSP standard with a PM₁₀ standard of 50 µg/m³. The ruling similarly announced new Federal Reference Methods for measuring PM₁₀ and issued Appendix J and Appendix K to Part 50 as guidance.

Upon enactment of the 1990 Clean Air Act (CAA) amendments, Imperial County was classified as “Moderate” nonattainment for the PM₁₀ NAAQS under the CAA sections 107(d)(4)(B) and 188(a). By November 15, 1991, such areas were required to develop and submit State Implementation Plan (SIP) revisions providing for, among other things, implementation of reasonably available control measures (RACM).

Partly to address the RACM requirement, ICAPCD adopted local Regulation VIII rules to control PM₁₀ from sources of fugitive dust on October 10, 1994, and revised them on November 25, 1996. US EPA did not act on these versions of the rules with respect to the federally enforceable SIP.

On August 11, 2004, US EPA reclassified Imperial County as a “Serious” nonattainment area for PM₁₀. As a result, CAA section 189(b)(1)(B) required all Best Available Control Measures (BACM) to be implemented in the area within four years of the effective date of the reclassification, i.e., by September 10, 2008.

On November 8, 2005, partly to address the BACM requirement, ICAPCD revised the Regulation VIII rules to strengthen fugitive dust requirements. On July 8, 2010, US EPA finalized a limited approval of the 2005 version of Regulation VIII, finding that the seven Regulation VIII rules largely fulfilled the relevant CAA requirements. Simultaneously, US EPA also finalized a limited disapproval of the rules, identifying specific deficiencies. Addressing these deficiencies would fully demonstrate compliance with CAA requirements regarding BACM and enforceability.



September 2010, ICAPCD and the California Department of Parks and Recreation (DPR) filed petitions with the Ninth Circuit Federal Court of Appeals for review of US EPA's limited disapproval of the rules. After hearing oral argument on February 15, 2012, the Ninth Circuit directed the parties to consider mediation before rendering a decision on the litigation. On July 27, 2012, ICAPCD, DPR and US EPA reached a settlement agreement on a resolution to the dispute, which included a set of specific revisions to Regulation VIII, adopted by ICAPCD on October 16, 2012 and approved by US EPA April 22, 2013.

II 40 CFR 51.930 MITIGATION OF EXCEPTIONAL EVENTS

Section 51.930(b)(2) refers to the minimum plan components that must be included within mitigation plans for areas identified with "historically documented" or "known seasonal" events. The US EPA identified the Imperial Valley PM₁₀ Nonattainment area as subject to the mitigation requirements. Following are the three minimum plan components described within 40 CFR 51.930(b)(2);

- II.1 Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours. [**40 CFR 51.930(b)(2)(i)**]

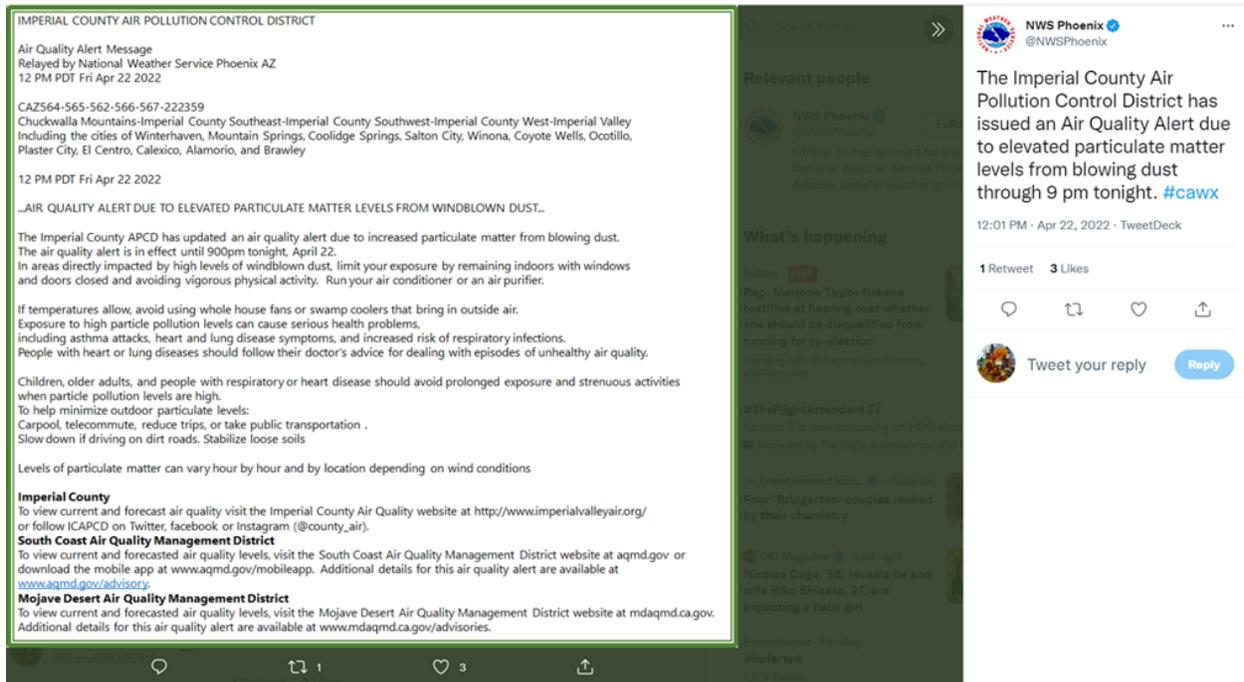
In keeping with the ICAPCD's commitment to protect the public health the ICAPCD is committed to providing daily real-time current air quality information, analysis and air quality programs to the public. While the ICAPCD continues to utilize standard outreach programs such as informative brochures, [participation in community](#) and ~~outreach programs to communities and schools~~ [school events](#), most recent developments in social media and web-based tools have created access to near instantaneous information for public use. Web-based information utilized by the ICAPCD includes the ICAPCD home page at www.co.imperial.ca.us, [Twitter](#), [Instagram](#), [Facebook](#), ~~and~~ the air quality alert page at www.imperialvalleyair.org, ~~and as of 2022 the dissemination of air quality alerts by the NWS in Phoenix.~~

Supporting the dissemination of air quality information is a robust near real-time air-monitoring network that supports the mapping of pollutants within the major cities within Imperial County. The data allows for analysis and forecasting of air quality concentrations for up to seven days helping the public, schools and industry to make informed decisions about their daily activities.

The ~~home page for social media outlets managed by~~ the ICAPCD ~~at~~ www.co.imperial.ca.us, ~~provides meteorological forecasting information as~~ [provide air quality](#) advisories,

curtailments, and associated notices to help the public make informed decisions about their daily activities. Typically, the ICAPCD issues alerts or advisories as a forecast and as near real time as possible. To successfully issue these forecasts and/or real time events the ICAPCD worked closely with the NWS in Phoenix. As work with the NWS in Phoenix continued it became evident that there was deep interest in working collaboratively to establish an Air Quality Alert system that would disseminate through the NWS platform. These advisories provide current and forecast information summarized from NWS issued notices and area forecast discussion from the San Diego and Phoenix offices. Combined these advisories provide current and forecast winds, thunderstorms, troughs and any other meteorological event that may suspend or transport particulate matter in Imperial County. In addition, the ICAPCD publishes urgent weather and hazardous weather notices issued by either NWS office, such as blowing dust advisories and/or high wind advisories. The site similarly provides information regarding the health effects associated with elevated concentrations of pollutants, complaint procedures, along with a variety of notices pertinent to updates on rules, State Implementation Plans, programs, funding and information regarding the Air Quality Flag Program.

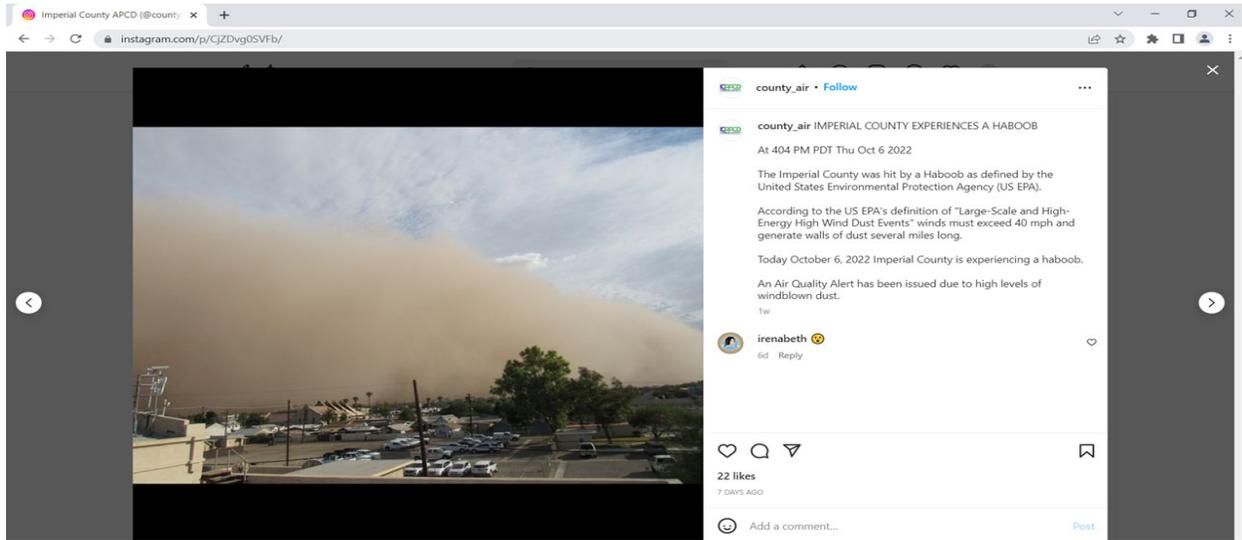
FIGURE 2-1
APRIL 22, 2022 AIR QUALITY ALERT



With the enhancement to the air monitoring network, the ICAPCD invested significant resources enhancing its air monitoring network. With the completion of the enhancement the ICAPCD successfully installed eight cameras at all the ICAPCD managed air quality stations. These cameras allow the ICAPCD real time images of meteorological and human

activities that may affect air quality. In all practical terms the ICAPCD uses these cameras as a support to collected air quality data, issued notices and compliance actions.

FIGURE 2-2
OCTOBER 6, 2022 HABOOB POSTING FOR IMPERIAL COUNTY



The determinations to issue air alerts through social media are assessed daily using collected data from air monitoring equipment, meteorological assessments by the NWS office in Phoenix and meteorological assessments from the NWS office in San Diego.

FIGURE 2-3

RETWEET BY ICAPCD A LARGE DUST STORM IN IMPERIAL COUNTY



At any given minute time of the day, the public may view any one of the eight camera's cameras to view air quality conditions in El Centro, Brawley, Westmorland or Niland, via the ICAPCD website. The images refresh at 30 second intervals and provide a visual of the meteorological conditions as near real-time as possible.

The Complementing the social media outlets used by the ICAPCD is the air quality site at www.imperialvalleyair.org. Imperial Valley Air provides the air quality index information and related health information. Subscribers receive notifications, alerts and forecast information ~~that may affect~~affecting air quality in Imperial County on any given day. Several products are available to the public and the ICAPCD via the site. For example, the site includes the mapping of near real-time pollutants as the Air Quality Index (AQI) as support for issued near real time air alerts, air quality summaries, short-term and long-term air quality forecasts all of which provide health impacts and meteorological information to the help the public make informed decisions regarding their daily activities.

New in 2022 is the launch of the Imperial County Air Quality Advisory System through our federal partners at the NWS office in Phoenix.

FIGURE 2-4

ICAPCD ANNOUNCEMENT NWS AIR QUALITY ADVISORIES FOR IMPERIAL

THE NATIONAL WEATHER SERVICE IS NOW PUBLISHING AIR QUALITY ADVISORIES FOR IMPERIAL COUNTY

For more info visit : www.weather.gov/psr/

This collaborative effort was accomplished over the span of two of two years work with the cooperation and input of the South Coast Air Quality Management District, the Mojave Air Quality District, San Diego Air Pollution Control District, the NWS offices in Oxnard, San Diego and Phoenix.

Transmitted warnings of current air pollution events occur via the ICAPCD ~~website, mobile application, all the managed media outlets by the~~ ICAPCD ~~sponsored e-mails or texts~~. The released notifications reach not only the public but reach media such as the local radio stations and the Imperial Valley Press. Although the ICAPCD encourages the publication of the information as a “Public Service Announcement”, these publications occur as a single notice once a day.

The pollutants that drive the notifications seasonally are Ozone, during the summer months June through September, PM_{2.5} during the winter months, December through February and PM₁₀ throughout the year as west winds blow, winter, spring and fall storms pass, and during the monsoonal period June through September. Preceding the natural events are wind and dust advisories while during the event, similar posted notifications advise the public of the potential for elevated concentrations at or above Unhealthy Levels for Sensitive Groups. The notices provide meteorological and concentration information with recommendations to the public about how to reduce exposure. An example of the issued alert by the ICAPCD when the AQI level for Unhealthy for Sensitive Groups reads:

People with respiratory or heart disease, the elderly, and children are the groups most at risk, especially when they are physically active. There is an increased likelihood of respiratory symptoms in sensitive individuals, and aggravation of heart or lung disease and premature mortality in persons with cardiopulmonary disease and the elderly. U.S. EPA cautions "people with heart or lung disease, older adults, and children should reduce prolonged or heavy exertion." 'Prolonged' generally means four or more hours with short rest periods. 'Heavy exertion' is that which would increase the resting breathing rate four fold or greater. You can reduce exposure to particulate material by: - Reducing the intensity and duration of your outdoor activities – Postponing outdoor activities to days when particulate levels are lower

An example of the issued forecast alert by the ICAPCD when forecast indicate that the AQI level for Unhealthy for Sensitive Groups is possible reads:

~~Today, gusty winds associated with monsoonal thunderstorms will lead to areas of blowing dust, increasing particle concentrations. Therefore, AQI levels will be Unhealthy for Sensitive Groups. Tomorrow, decreasing thunderstorm activity will reduce blowing dust in the Imperial Valley. However, southeasterly winds will bring pollutants into the region, and mostly sunny skies will enhance ozone production. Therefore, AQI levels will be Moderate.~~

[...AIR QUALITY ALERT DUE TO ELEVATED PARTICULATE MATTER LEVELS FROM WINDBLOWN DUST...](#)

[The Imperial County APCD has issued an air quality alert due to increased particulate matter from blowing dust. The air quality alert is in effect until 5am PDT Wednesday, April 20.](#)

[In areas directly impacted by high levels of windblown dust, limit your exposure by remaining indoors with windows and doors closed and avoiding vigorous physical activity. Run your air conditioner or an air purifier. If temperatures allow, avoid using whole house fans or swamp coolers that bring in outside air.](#)

[Exposure to high particle pollution levels can cause serious health problems, including asthma attacks, heart and lung disease symptoms, and increased risk of respiratory infections. People with heart or lung diseases should follow their doctor's advice for dealing with episodes of unhealthy air quality. Children, older adults, and people with respiratory or heart disease should avoid prolonged exposure and strenuous activities when particle pollution levels are high.](#)

[To help minimize outdoor particulate levels:](#)

[.Carpool, telecommute, reduce trips, or take public transportation](#)



- [. Slow down if driving on dirt roads](#)
- [. Stabilize loose soils](#)

[Levels of particulate matter can vary hour by hour and by location depending on wind conditions](#)

- II.2 Steps to identify, study and implement mitigating measures, including the four approaches listed below. **[40 CFR 51.930(b)(2)(ii)]**
- ❖ Measures to abate or minimize contributing controllable sources of identified pollutants. **[40 CFR 51.930(b)(2)(ii)(A)]**

The ICAPCD adopted a suite of rules, known as Regulation VIII, to address fugitive dust emissions within Imperial County. Regulation VIII consists of seven interrelated rules designed to limit emissions of PM₁₀ from anthropogenic fugitive dust sources in Imperial County.

Rule 800, General Requirements for Control of Fine Particulate Matter, provides definitions, a compliance schedule, exemptions and other requirements generally applicable to all seven rules. It requires the United States Bureau of Land Management (BLM), United States Border Patrol (BP) and DPR to submit dust control plans (DCP) to mitigate fugitive dust from areas and/or activities under their control. Appendices A and B within Rule 800 describe methods for determining compliance with opacity and surface stabilization requirements in Rules 801 through 806.

Rule 801, Construction and Earthmoving Activities, establishes a 20% opacity limit and control requirements for construction and earthmoving activities. Affected sources must submit a DCP and comply with other portions of Regulation VIII regarding bulk materials, carry-out and track-out, and paved and unpaved roads. The rule exempts single family homes and waives the 20% opacity limit in winds over 25 mph under certain conditions.

Rule 802, Bulk Materials, establishes a 20% opacity limit and other requirements to control dust from bulk material handling, storage, transport and hauling.

Rule 803, Carry-Out and Track-Out, establishes requirements to prevent and clean-up mud and dirt transported onto paved roads from unpaved roads and areas.

Rule 804, Open Areas, establishes a 20% opacity limit and requires land owners to prevent vehicular trespass and stabilize disturbed soil on open areas larger than 0.5 acres in urban areas, and larger than three acres in rural areas. Agricultural operations are exempted.



Rule 805, Paved and Unpaved Roads, establishes a 20% opacity limit and control requirements for unpaved haul and access roads, canal roads and traffic areas that meet certain size or traffic thresholds. It also prohibits construction of new unpaved roads in certain circumstances. Single-family residences and agricultural operations are exempted.

Rule 806, Conservation Management Practices, requires agricultural operation sites greater than 40 acres to implement at least one conservation management practice (CMP) for each of several activities that often generates dust at agricultural operations. In addition, agricultural operation sites must prepare a CMP plan describing how they comply with Rule 806, and must make the CMP plan available to the ICAPCD upon request.

Additional measures include the adoption of a Smoke Management Plan (SMP), and the identification of additional mitigation measures or conditions imposed through the California Environmental Quality Act (CEQA) process.

SMP Summary

There are 35 Air Pollution Control Districts or Air Quality Management Districts in California, which are required to implement a district-wide smoke management program. The regulatory basis for California's Smoke Management Program, codified under Title 17 of the California Code of Regulations is the "Smoke Management Guidelines for Agricultural and Prescribed Burning" (Guidelines). California's 1987 Guidelines revised to improve interagency coordination, to avoid smoke episodes, and to provide continued public safety provided adequate opportunity for necessary open burning. Approval of the revisions to the 1987 Guidelines occurred March 14, 2001. All air districts, with the exception of the San Joaquin Valley Air Pollution Control District (SJAPCD) were required to update their existing rules and Smoke Management Plans to conform to the most recent update to the Guidelines.

Section 80150 of Title 17 specifies the special requirements for open burning in agricultural operations, the growing of crops and the raising of fowl or animals. This section specifically requires the ICAPCD to have rules and regulations that require permits that contain requirements that minimize smoke impacts from agricultural burning.

On a daily basis, the ICAPCD reviews surface meteorological reports from various airport agencies, the NWS, State fire agencies and CARB to help determine whether the day is a burn day. In order to assure minimal to no smoke affects, thus safeguarding the public health, the ICAPCD allocates field burns using a four-quadrant map of Imperial County. Finally, all permit holders are required to notice and advise members of the public of a potential burn also known as the Good Neighbor Policy.



A summary of the review process of development projects under the CEQA process. When new development, either commercial or residential intend to build the ICAPCD reviews potential impacts to air quality during the construction and operational phases of the projects. Determinations of potential significance, such as project-level emissions contributing to an exceedance and/or potentially causing an exceedance the ICAPCD requires mitigation measures or the imposition of conditions to the planning permit process that reduce or mitigate the excess emissions. For example, while solar farms have little to no direct long-term impact upon air quality on a project level analysis, cumulative impacts of PM₁₀ may be significant. Therefore, all solar farms are required to develop and implement an Operational Dust Control Plan (ODCP) addressing actual, future and potential future sources of PM₁₀ during the life of the project. There must be an approved and submitted ODCP's subject to annual review on file in order for these solar facilities to receive their Certificate of Occupancy.

- ❖ Methods to minimize public exposure to high concentrations of identified pollutants. **[40 CFR 51.930(b)(2)(ii)(B)]**

The ICAPCD employs near real-time notifications through ~~electronic~~ all available social and radio media when air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours. ~~Two electronic sources are~~ As described above the social media outlets utilized ~~the home page for~~ by the ICAPCD include the ICAPCD home page at www.co.imperial.ca.us and, Twitter, Instagram, Facebook, the air quality ~~website~~ index alert page at www.imperialvalleyair.org and as of 2022 the dissemination of air quality alerts by the NWS in Phoenix.

Local radio and newspapers pick up posted and released notices ~~by either site~~ from the social media outlets providing local "Public Service Announcements." In addition, the public may opt to utilize smartphone applications, e-mails or text messaging to receive notifications, alerts or any other educational material. The types of information provided by the ICAPCD include:

- » Dissemination of near real-time air quality information including pollutant concentration levels and meteorology
- » Daily forecast air quality ~~forecast~~ for short term and long term planning
- » Public notifications, advisories, alerts and warnings
- » Public education

Utilizing a variety of brochures, flyers, leaflets, pencil and pen products and other gift type items the ICAPCD continues to provide information and education through participation

in school career day for schools, Asthma Coalition programs, the Public Health sponsored “Children’s Fair” as well as other environmental group gatherings. [In addition, for 2022, the ICAPCD has commenced with the planning and funding of a new campaign targeting motor vehicle, both onroad and offroad speed. Collaboration community stakeholders, federal and state agencies will commence during the fall of 2022.](#)

- ❖ Processes to collect and maintain data pertinent to the event.
[40 CFR 51.930(b)(2)(ii)(C)]

There are five State and Local Air Monitoring Stations (SLAMS) located in Imperial County. SLAMS sites are regulatory air quality and meteorological monitoring stations maintained and operated as part of the overall air-monitoring network for the State of California. Of the five SLAMS within Imperial County, four stations measure both meteorological and air quality data. These SLAMS are located in Calexico, El Centro, Westmorland, and Niland; the station located in Brawley only measures air quality. All five monitoring sites utilize a Federal Equivalent Method Beta Attenuation Monitor (BAM) 1020 to measure PM₁₀. Other regulatory sites utilized by the ICAPCD include sites within Riverside County and Yuma County.

All collected data undergoes quality assurance and quality control (QA/QC) procedures to assure the most representative data point at any given hour. The US EPA’s AQS maintains all regulatory significant data while the California Air Resources Board (CARB) maintains near real-time data as well as regulatory significant data that is easily accessible to any member of the public, educational institution or industry. Finally, the AQI website for Imperial County, www.imperialvalleyair.org utilizes near real-time data from the AirNow website.

In addition to the regulatory monitors, the ICAPCD utilizes non-regulatory PM₁₀ sites located around the Salton Sea when analyzing the potential and source of natural events. **Figure 2-1** is a graphical illustration of the sites utilized by the ICAPCD when analyzing the source of a natural event or when analyzing the potential impact resulting from a natural event.

Archived data, including ambient data, meteorological data, images, advisories, and pertinent notices within the ICAPCD central server is backup twice daily. All events are filed by the date of the event.

FIGURE 2-15 **MONITORING SITES IN AND AROUND IMPERIAL COUNTY**



Fig 2-15: Depicts a select group of PM₁₀ monitoring sites in Imperial County, eastern Riverside County, and southwestern Arizona (Yuma County). Generated through Google Earth

- ❖ Mechanisms to consult with other air quality managers in the affected area regarding the appropriate responses to abate and minimize impacts. **[40 CFR 51.930(b)(2)(ii)(D)]**

The desert southwest, which includes other planning partners and air districts such as the Arizona Department of Environmental Quality, the South Coast Air Quality Management District and the San Diego Air Pollution Control District all, implement programs that help protect the public from exposure to high concentrations of particulate matter. ICAPCD staff maintains a subscription to notifications and bulletins from surrounding air agencies, the NWS, Weather Underground and in Mexico, the Servicio Meteorológico Nacional. ICAPCD routinely visits the National Oceanic and Atmospheric Administration (NOAA) for supporting information and evidence of the occurrence or of the potential of an occurrence of a natural event. ICAPCD staff routinely maintains contact and shares information with other air agencies, identified above, the CARB and US EPA.



- II.3 Provisions for periodic review and evaluation of the Mitigation Plan and its implementation and effectiveness by the State and all interested stakeholders.
[**40 CFR 51.930(b)(2)(iii)**]

Although the ICAPCD will post the final Mitigation Plan for a 30-day public review, the Mitigation Plan will remain permanently online and will be accessible to the public. The ICAPCD intends to explain and address any comments submitted during the 30-day public review process. Upon submitting the final Mitigation Plan, explanations as to why the air district made or did not make changes to the Mitigation Plan will be included along with the submitted comments. After the submittal of the final Mitigation Plan, the ICAPCD intends to review and evaluate the Mitigation Plan every three years. The ICAPCD will maintain periodic communications with air quality officials and the public to provide an ongoing evaluation of the effectiveness of the Mitigation Plan over a three-year period.

- ❖ With the submission of the initial Mitigation Plan according to the requirements in paragraph (b)(3) of this section that contains the elements in paragraph (b)(2) of this section, the State must: [**40 CFR 51.930(b)(2)(iii)(A)**]

- 1 Document that a draft version of the mitigation plan was available for public comment for a minimum of 30 days:

The ICAPCD published its Notice of Availability of the Draft High Wind Exceptional Event Fugitive Dust Mitigation Plan in the Imperial Valley press and on its webpage on August 18, 2018. The public comment period ended September 17, 2018. **Figure 2-2 6** is a copy of the affidavit attesting to the publication.



FIGURE 2-26

IMPERIAL VALLEY PRESS AFFIDAVIT

PENDING AFFIDAVIT CLOSING COMMENT DATE NOVEMBER 21, 2022

Fig 2-26: Is a copy of the Imperial Valley Press Affidavit attesting to the 30-day publication of the Updated Draft High Wind Exceptional Event Fugitive Dust Mitigation Plan

- 2 Submit the public comments it received along with its mitigation plan to the Administrator; and

Following the comment period, the ICAPCD received no comments from the public.

- 3 In its submission to the Administrator, for each public comment received, explain the changes made to the Mitigation Plan or explain why the State did not make any changes to the Mitigation Plan.

Following the comment period, the ICAPCD received no public comments. Changes to the document reflected administrative corrections.

- ❖ The State shall specify in its Mitigation Plan the periodic review and evaluation process that it intends to follow for reviews following the initial review identified in paragraph (b)(2)(iii)(A) [**40 CFR 51.930(b)(2)(iii)(B)**]

In order to provide the best opportunity for the public, stakeholders and other government agencies to comment on the Final Mitigation Plan the ICAPCD will permanently post the plan online soliciting feedback. Information regarding the review and evaluation will be explained and indicate the three year evaluation process. In the event that PM₁₀ rulemaking occurs within the three-year period, updates to the Mitigation Plan will be in accordance with rule revisions. CARB and US EPA shall receive revised copies of the Mitigation Plan.

III Submission of Mitigation Plans [40 CFR 51.930(b)(3)]

All states subject to the provisions of paragraph (b)....shall, after notice and opportunity for public comment identified in paragraph (b)(2)(iii)(A)..., submit a Mitigation Plan to the Administrator for review and verification of the plan components identified in paragraph (b)(2)....[**40 CFR 51.930(b)(3)**]



- ❖ States shall submit their mitigation plans within 2 years of being notified that they are subject to the provisions of paragraph (b) of 40 CFR 51.930. [**40 CFR 51.930(b)(3)(i)**]

The final rule effective date of September 30, 2016 requires the ICAPCD to submit to the US EPA Administrator a final Mitigation Plan by September 30, 2018. The final Mitigation Plan submitted to CARB on September 21, 2018 should be forwarded to the US EPA Administrator by September 30, 2018, which falls within the 2 year required period.



Exceptional Events Mitigation Plan Checklist

*Area Subject to Mitigation Requirements in 40 CFR 51.930: **The Imperial Valley PM₁₀ Nonattainment Planning Area***

*Applicable Pollutant and Event Type: **Particulate Matter Less than 10 Microns (PM₁₀)***

*Date of Mitigation Document: **September 17, 2018***

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation	User Notes	EPA Review Notes
		51.930(a)	A State requesting to exclude air quality data due to exceptional events must take appropriate and reasonable actions to protect public health from exceedances or violations of the NAAQS. At a minimum, the State must:	The air agency responsibilities described in 51.930(a)(1) – (a)(3) are functionally fulfilled by the mitigation plan requirements and components specified under 51.930(b)(2).
		51.930(a)(1)	Provide for prompt public notification whenever air quality concentrations exceed or are expected to exceed an applicable ambient air quality standard;	See above – 51.930(a).
		51.930(a)(2)	Provide for public education concerning actions that individuals may take to reduce exposures to unhealthy levels of air quality during and following an exceptional event; and	See above – 51.930(a).
		51.930(a)(3)	Provide for the implementation of appropriate measures to protect public health from exceedances or violations of ambient air quality standards caused by exceptional events.	See above – 51.930(a).
		51.930(b)	Development of mitigation plans for areas with historically documented or known seasonal events.	EPA responsibility.



Element Addressed	Plan Page Number	40 CFR 51.930		User Notes	EPA Review Notes
		Mitigation of Exceptional Events Regulatory Citation			
		51.930(b)(1)	<i>Generally.</i> All States having areas with historically documented or known seasonal events shall be required to develop a mitigation plan with the components identified in 51.930(b)(2) and submit such plan to the Administrator according to the requirements in 51.930(b)(3).	EPA responsibility (identification of areas).	
		51.930(b)(1)(i)	For purposes of the requirements set forth in 51.930, historically documented or known seasonal events shall include those events of the same type and pollutant that recur in a 3-year period and meet any of the following:	EPA responsibility.	
		51.930(b)(1)(i)(A)	Three events or event seasons for which a State submits a demonstration under the provisions of 40 CFR 50.14 in a 3-year period; or	EPA responsibility.	
		51.930(b)(1)(i)(B)	Three events or event seasons that are the subject of an initial notification of a potential exceptional event as defined in 40 CFR 50.14(c)(2) in a 3-year period regardless of whether the State submits a demonstration under the provisions of 40 CFR 50.14.	EPA responsibility.	
		51.930(b)(1)(ii)	The Administrator will provide written notification to States that they are subject to the requirements in 51.930(b) when the Administrator becomes aware of applicability.	EPA responsibility.	
	10	51.930(b)(2)	<i>Plan components.</i> At a minimum, each mitigation plan...shall contain provisions for the following:	State/local/tribal air agency responsibility.	



Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
	10	51.930(b)(2)(i)	Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours.	State/local/tribal air agency responsibility.	
	12	51.930(b)(2)(ii)	Steps to identify, study and implement mitigating measures, including approaches to address each of the following:	State/local/tribal air agency responsibility.	
	12	51.930(b)(2)(ii)(A)	Measures to abate or minimize contributing controllable sources of identified pollutants.	State/local/tribal air agency responsibility.	
	14	51.930(b)(2)(ii)(B)	Methods to minimize public exposure to high concentrations of identified pollutants.	State/local/tribal air agency responsibility.	
	15	51.930(b)(2)(ii)(C)	Processes to collect and maintain data pertinent to the event.	State/local/tribal air agency responsibility.	
	16	51.930(b)(2)(ii)(D)	Mechanisms to consult with other air quality managers in the affected area regarding the appropriate responses to abate and minimize impacts.	State/local/tribal air agency responsibility.	
	17	51.930(b)(2)(iii)	Provisions for periodic review and evaluation of the mitigation plan and its implementation and effectiveness by the State & interested stakeholders.	State/local/tribal air agency responsibility.	
	17	51.930(b)(2)(iii)(A)	With the submission of the initial mitigation plan according to the requirements in 51.930(b)(3) that contains the elements in 51.930(b)(2), the State must:	State/local/tribal air agency responsibility.	



Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
	17	51.930(b)(2)(iii)(A)(7)	Document that a draft version of the mitigation plan was available for public comment for a minimum of 30 days;	State/local/tribal air agency responsibility.	
	18	51.930(b)(2)(iii)(A)(2)	Submit the public comments received along with its mitigation plan to the Administrator; and	State/local/tribal air agency responsibility.	
	19	51.930(b)(2)(iii)(A)(3)	In its submission to the Administrator, for each public comment received, explain the changes made to the mitigation plan or explain why the State did not make any changes to the mitigation plan.	State/local/tribal air agency responsibility.	
	19	51.930(b)(2)(iii)(B)	The State shall specify in its mitigation plan the periodic review and evaluation process that it intends to follow for reviews following the initial review identified in 51.930(b)(2)(iii)(A).	State/local/tribal air agency responsibility.	
	19	51.930(b)(3)	<i>Submission of mitigation plans.</i> All States subject to the provisions of 51.930(b) shall, after notice and opportunity for public comment identified in 51.930(b)(2)(iii)(A), submit a mitigation plan to the Administrator for review and verification of the plan components identified in 51.930(b)(2).	This provision is also described in section 51.930(b)(2)(iii)(A)(1).	
	19	51.930(b)(3)(i)	States shall submit their mitigation plans within 2 years of being notified they are subject to 51.930(b).	State/local/tribal air agency responsibility.	
		51.930(b)(3)(ii)	The Administrator shall review each mitigation plan developed according to the requirements in paragraph (b)(2) of this section and shall notify the submitting State upon completion of such review.	EPA responsibility.	



Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
		50.14(b)(9)	Mitigation plans.	EPA responsibility.	
		50.14(b)(9)(i)	Except as provided for in 50.14(b)(9)(ii), where a State is subject to the requirements of 40 CFR 51.930(b), the Administrator shall not place a concurrence flag in the appropriate field for the data record in the AQS database, as specified in 50.14(c)(2)(ii), if the data are of the type and pollutant that are the focus of the mitigation plan until the State fulfills its obligations under the requirements of 40 CFR 51.930(b). The Administrator may nonconcur or defer action on such a demonstration.	EPA responsibility.	
		50.14(b)(9)(ii)	The prohibition on placing a concurrence flag in the appropriate field for the data record in the AQS database by the Administrator stated in 50.14(b)(9)(i) does not apply to data that are included in an exceptional events demonstration that is:	EPA responsibility.	
		50.14(b)(9)(ii)(A)	Submitted in accordance with 50.14(c)(3) that is also of the type and pollutant that is the focus of the mitigation plan; and	EPA responsibility.	
	19	50.14(b)(9)(ii)(B)	Submitted within 2-year period allowed for mitigation plan development specified in 51.930(b)(3).	This provision is also described in section 51.930(b)(3)(i).	

4. Presentations:
**B. Community Air Monitoring
Network Update
(CCV)**

Community Air Monitoring Update



IVAN
COMMUNITY

November 2022

Overview

Monitors Update

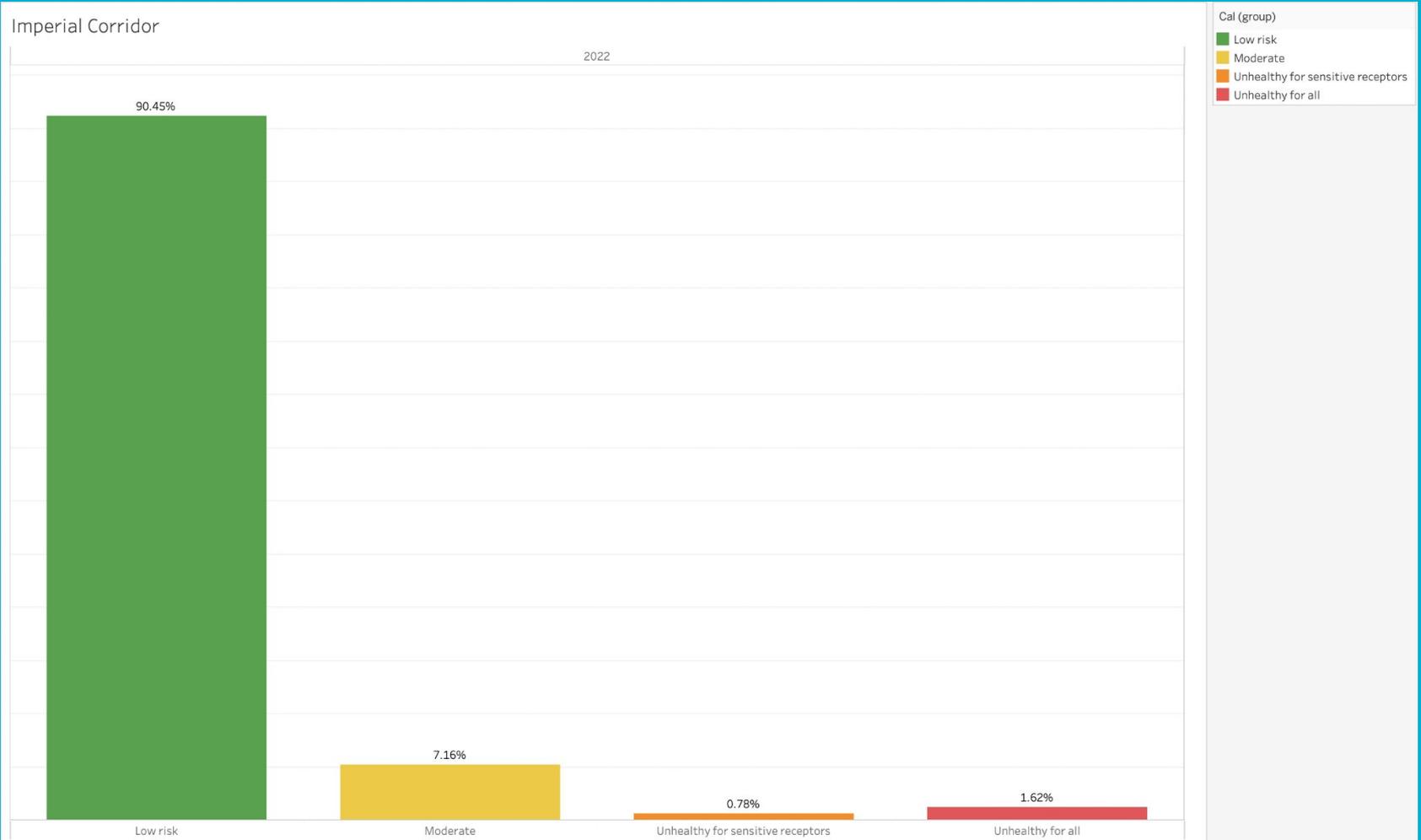
Preliminary Analysis

- Data from September - October 2022

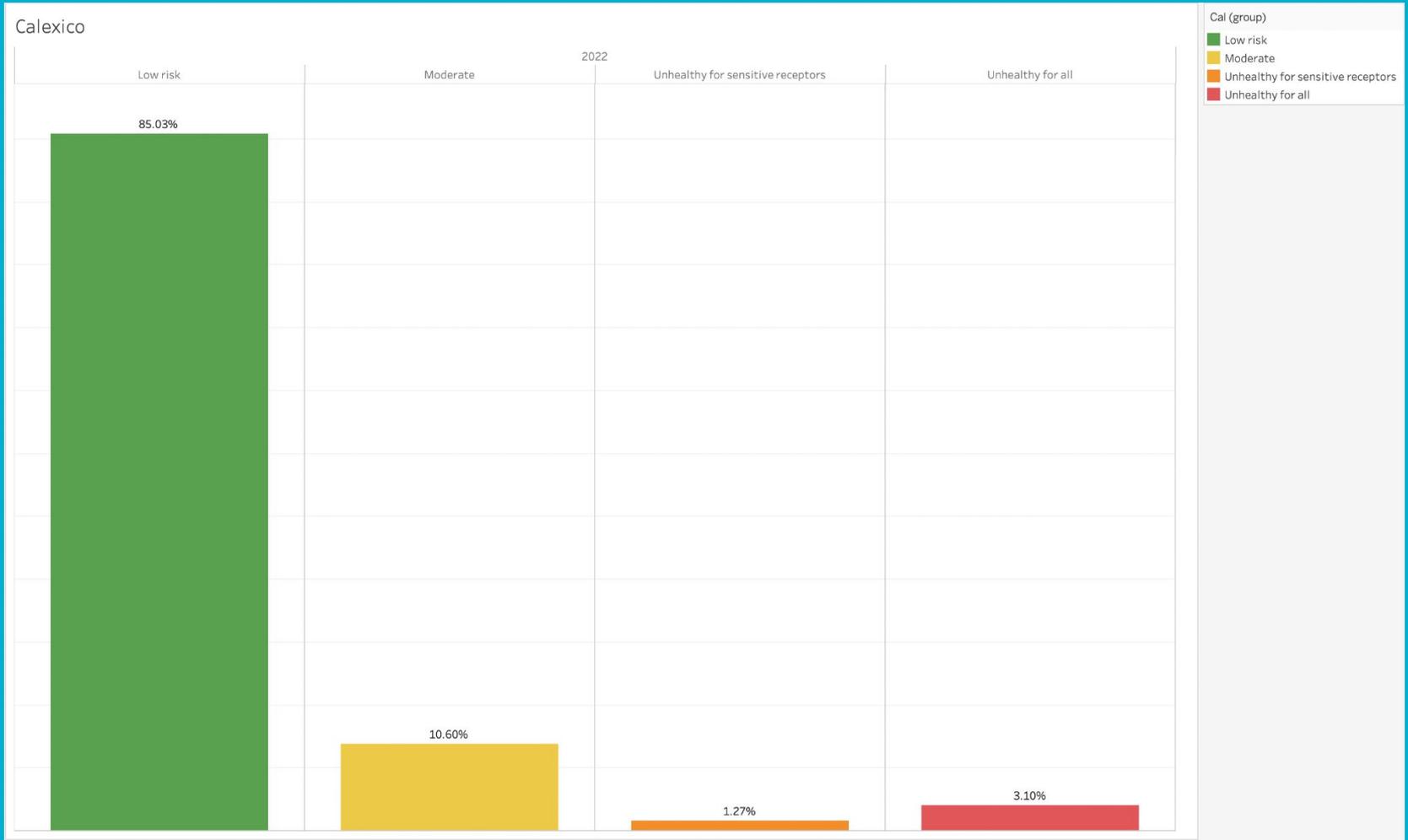
Next Steps

- IVAN training
 - Analysis questions?
-

Preliminary Analysis - Imperial Corridor



Preliminary Analysis – Calexico



Preliminary Analysis - Heber



Preliminary Analysis - El Centro



Next Steps

- Analysis Q's?
- IVAN training
 - December 14th
 - Reach out to Edgar Ruiz, edgar@ccvhealth.org or 760-351-8761 ext.120 to add your name to the list interested in participating.

UC Davis – Regional Trends (Placeholder)

4. Presentations:
C. Regional Trends
(UC Davis)

TREND ANALYSIS OF SALTON SEA AIR BASIN

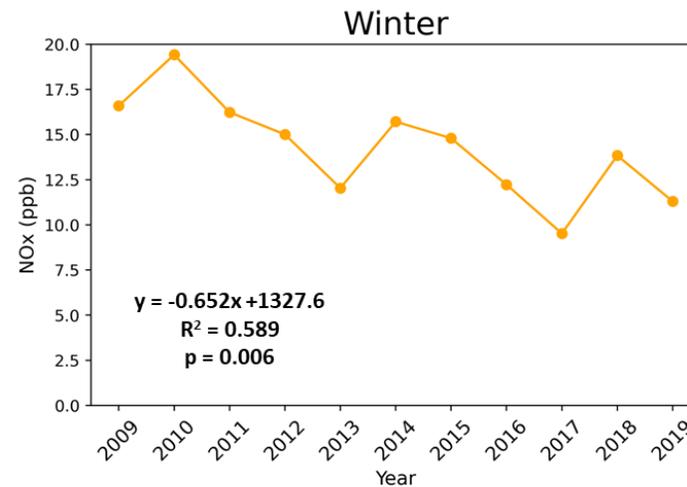
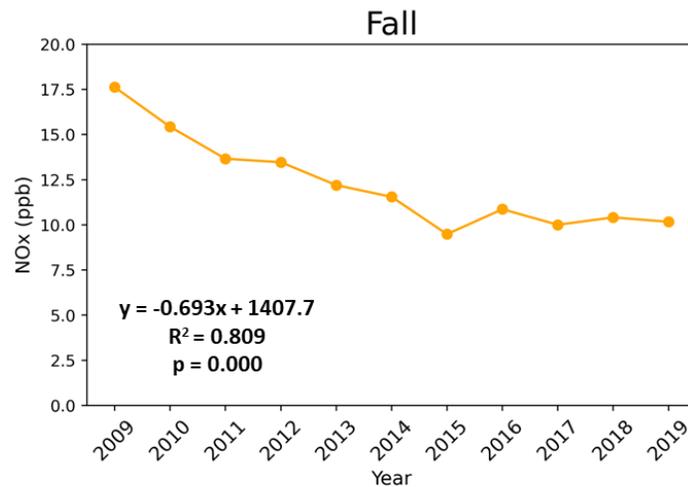
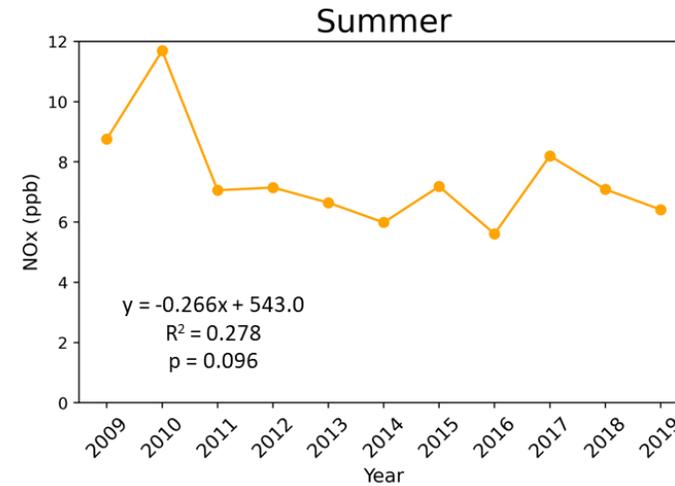
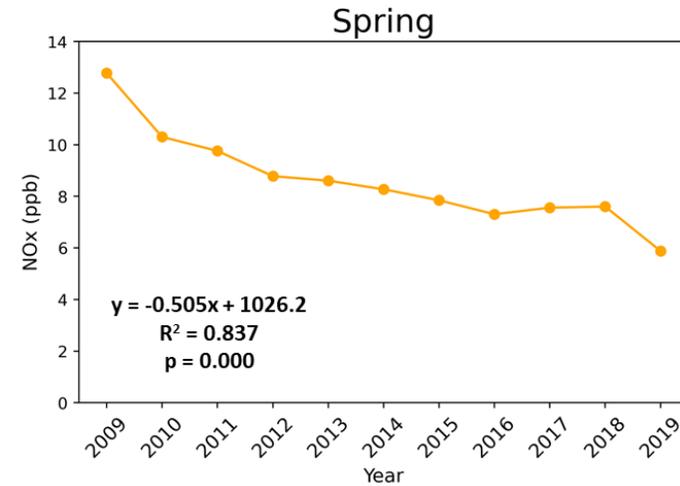
Heather Lieb

University of California, Davis

Dr. Ian Faloon

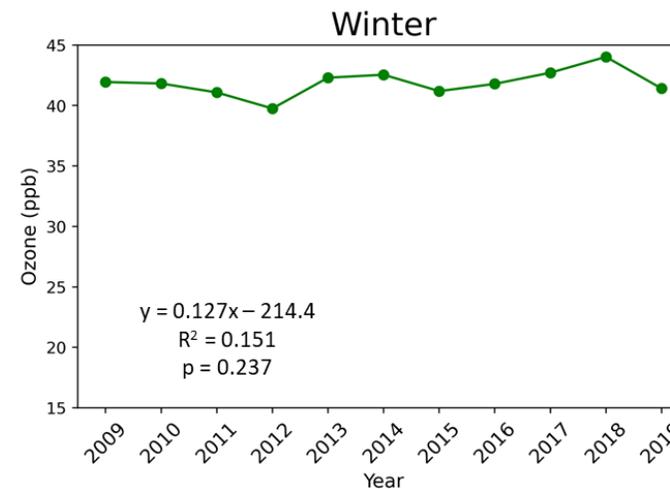
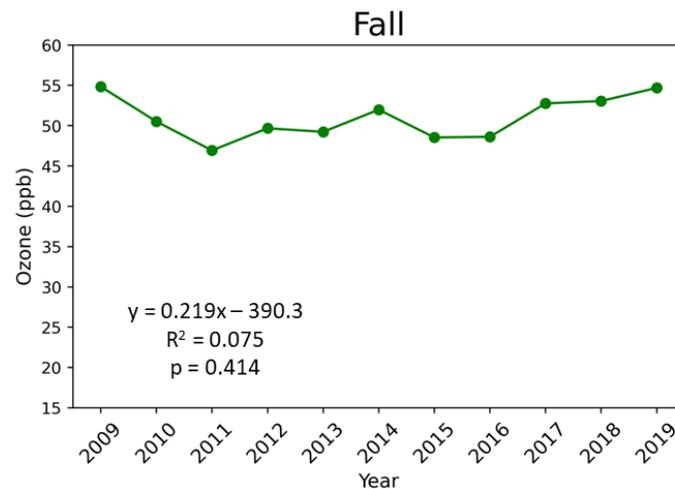
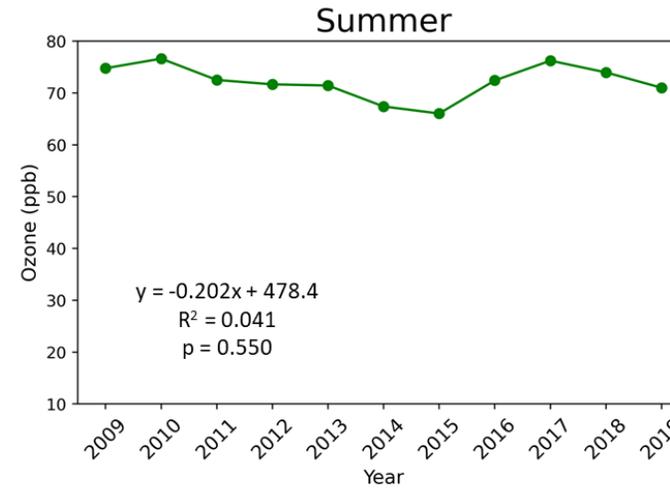
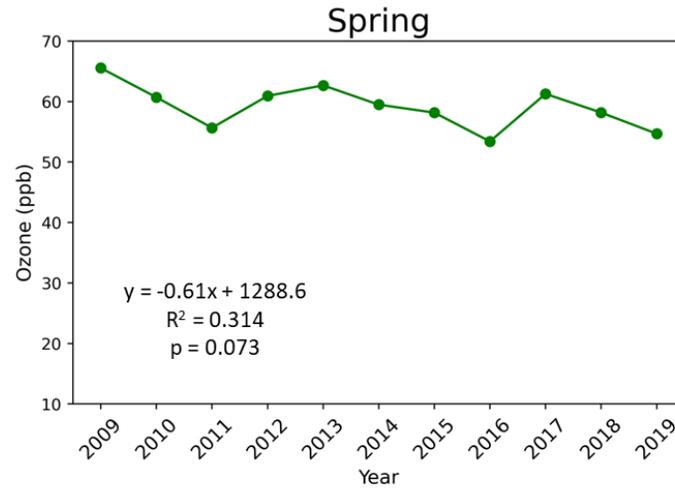
Seasonal NO_x Trends

Banning NO_x

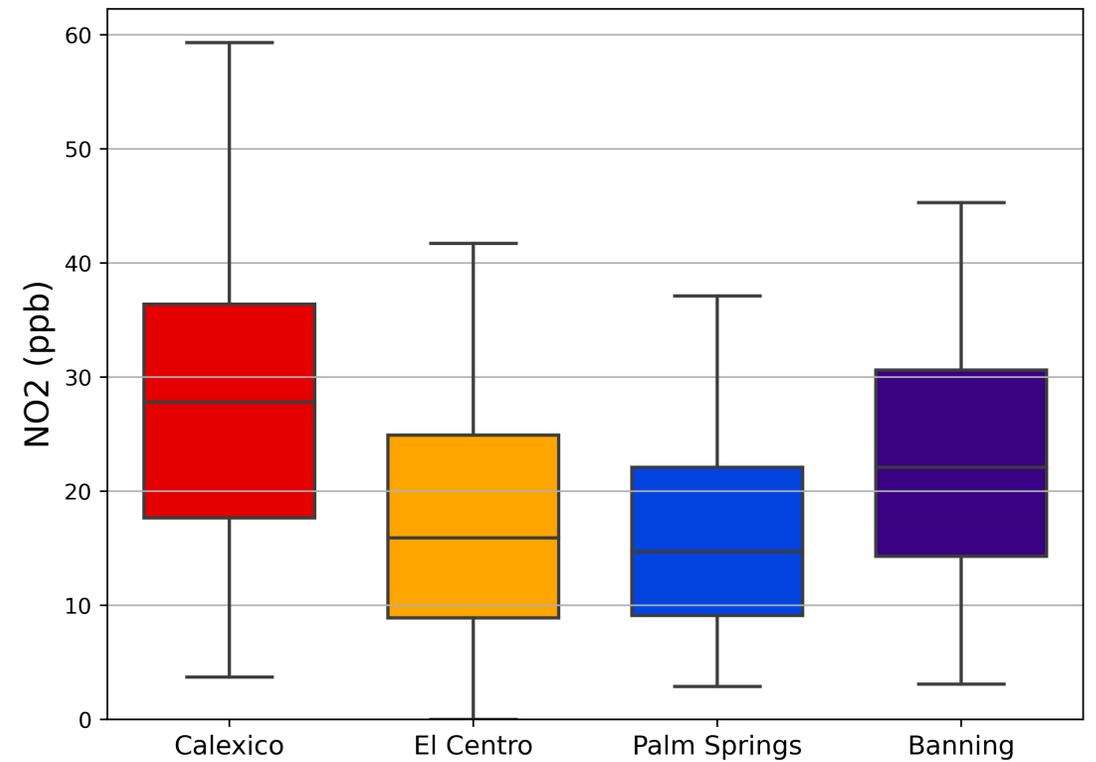
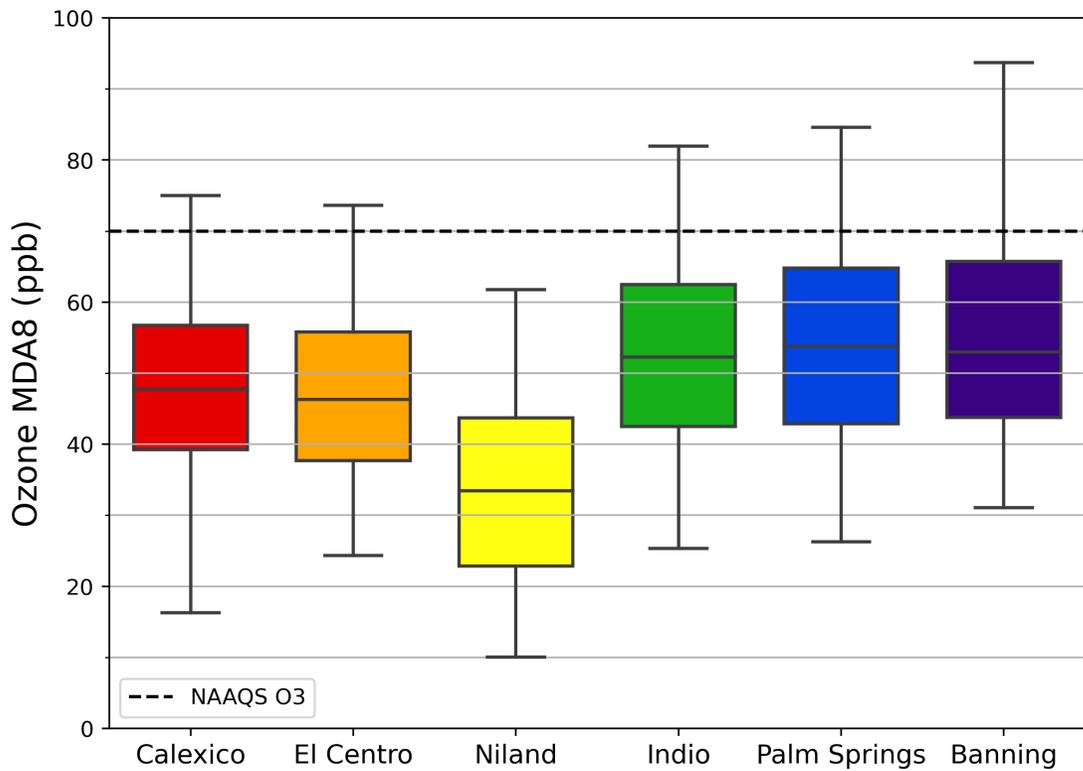


Seasonal MDA8 Trends

Banning Ozone

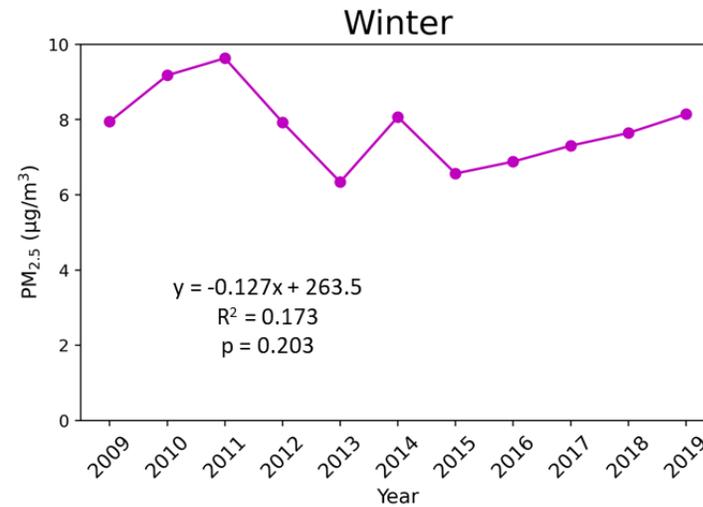
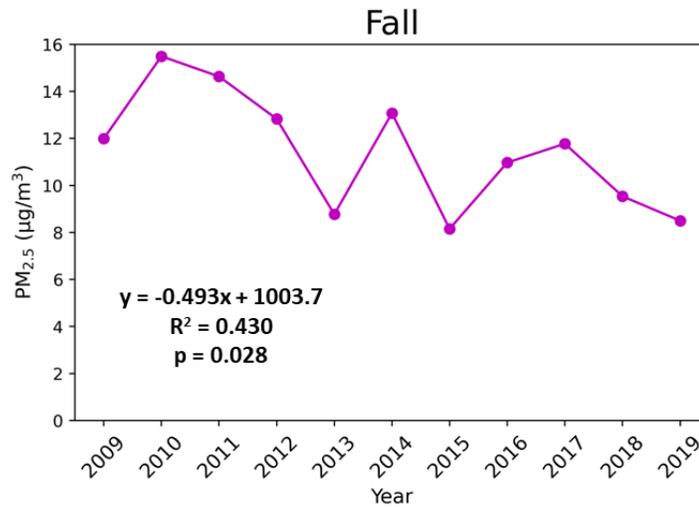
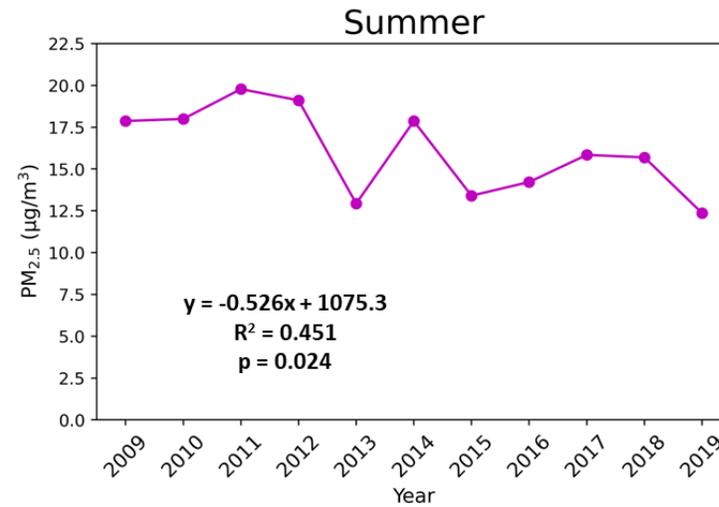
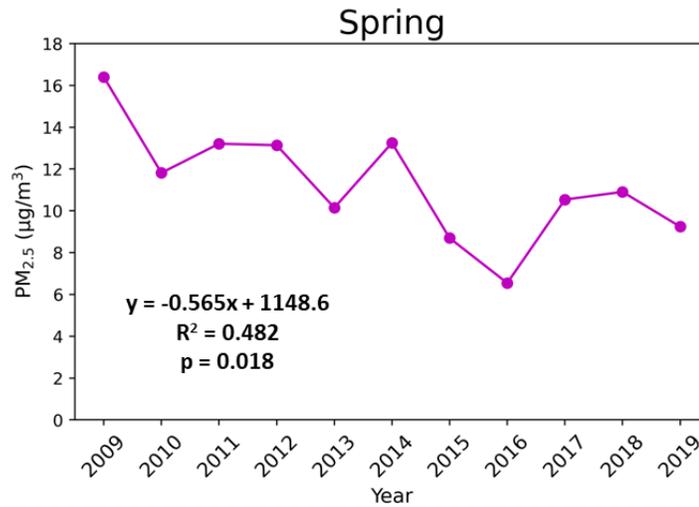


SPATIAL VARIABILITY

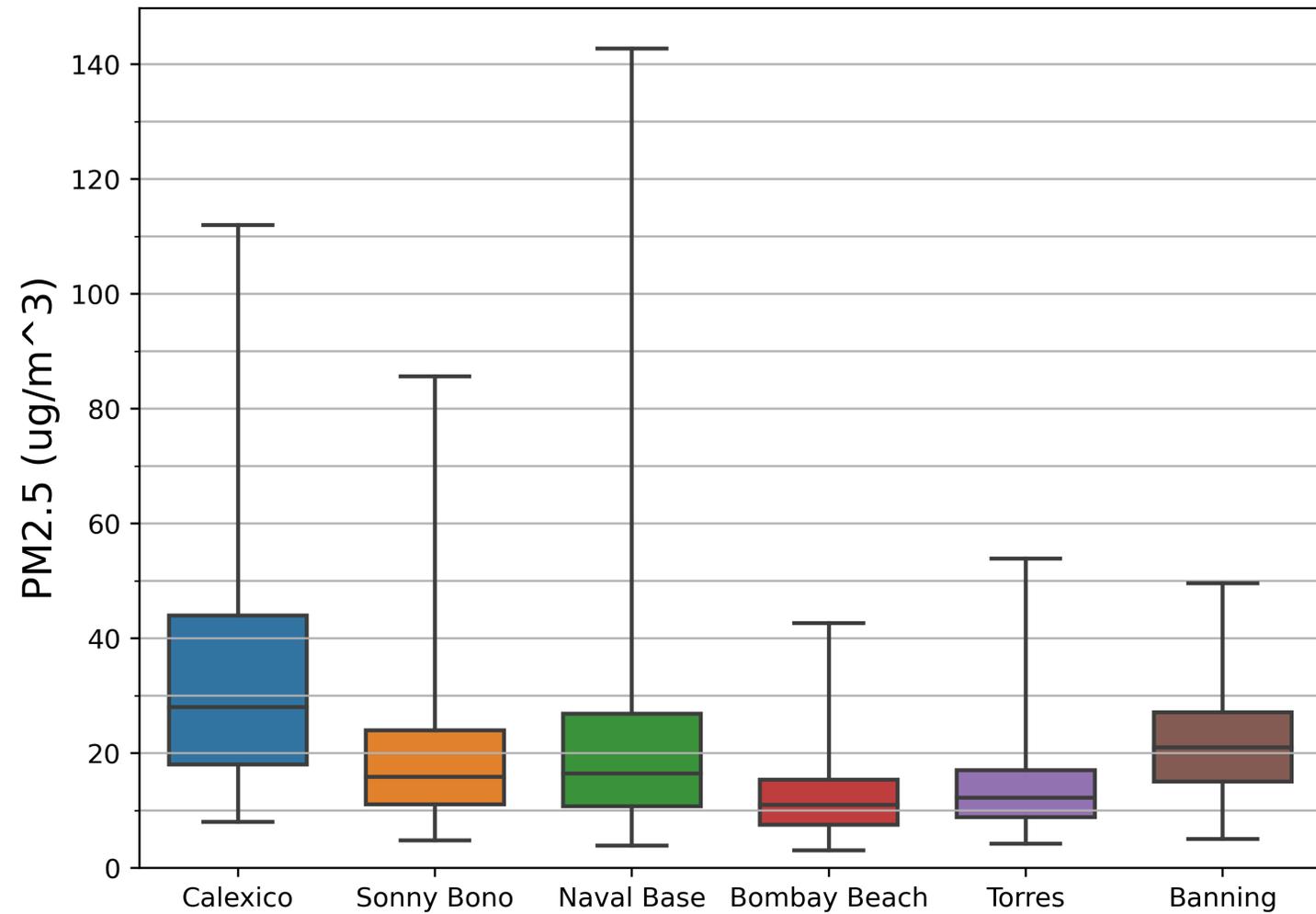


Seasonal PM_{2.5} Trends

Banning PM_{2.5}



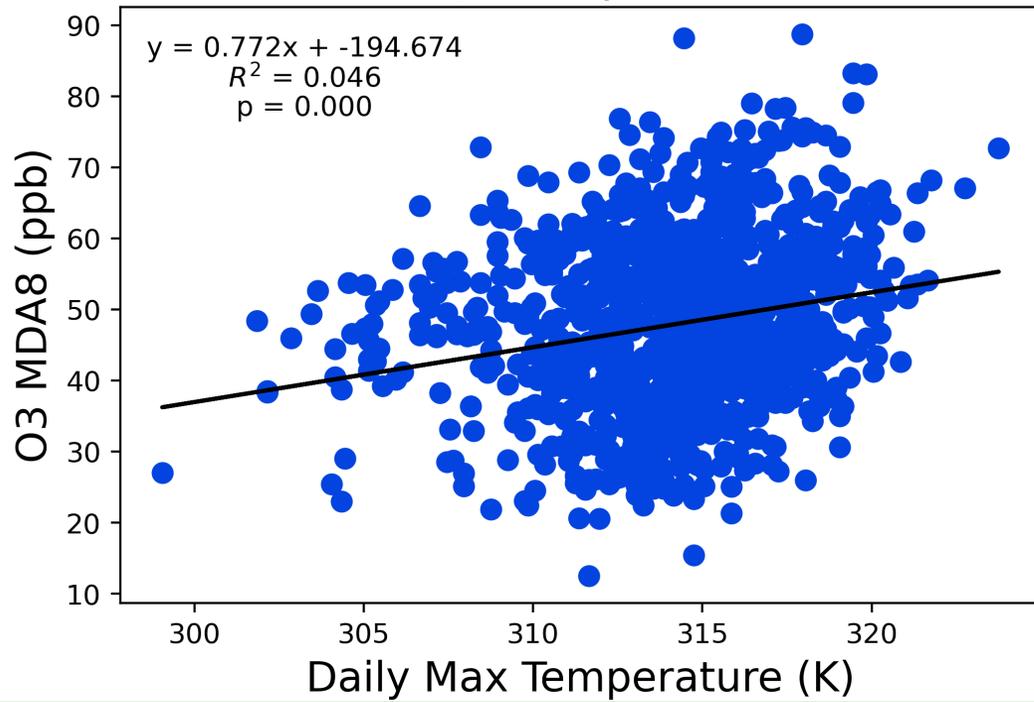
SPATIAL VARIABILITY



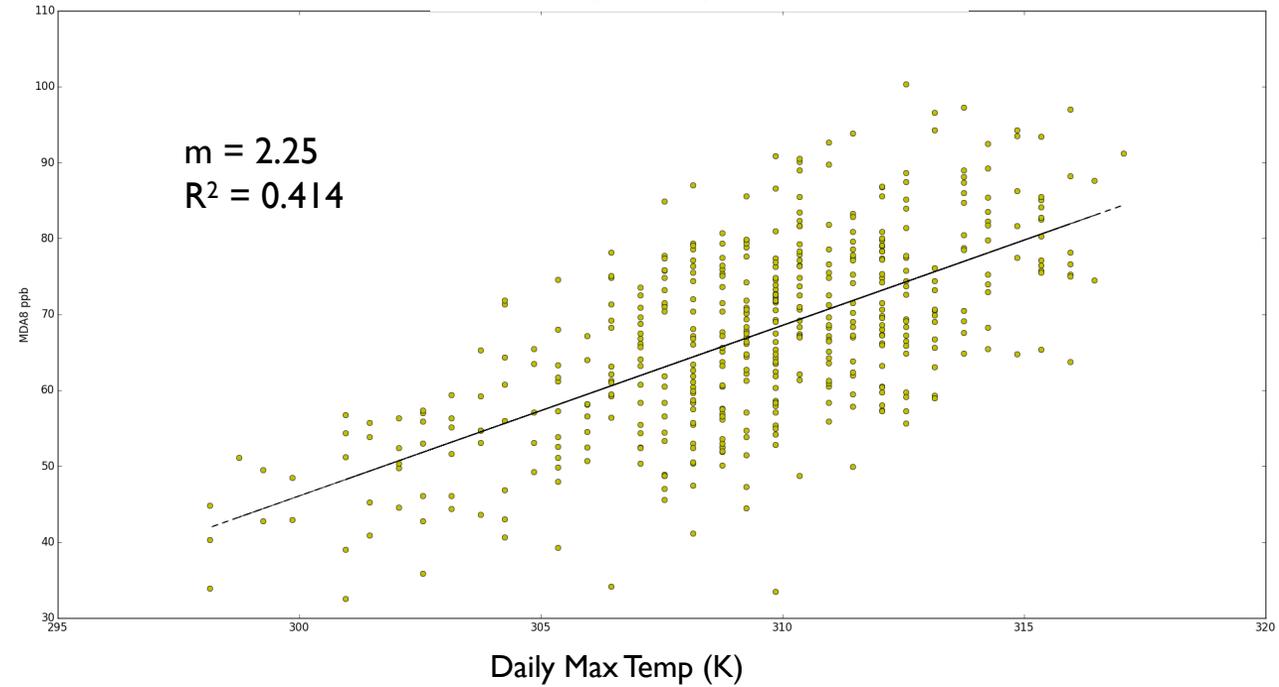
MDA8 vs T_{\max}

Calexico compared to SJV sites

Calexico Jun-Sept 2009-2019

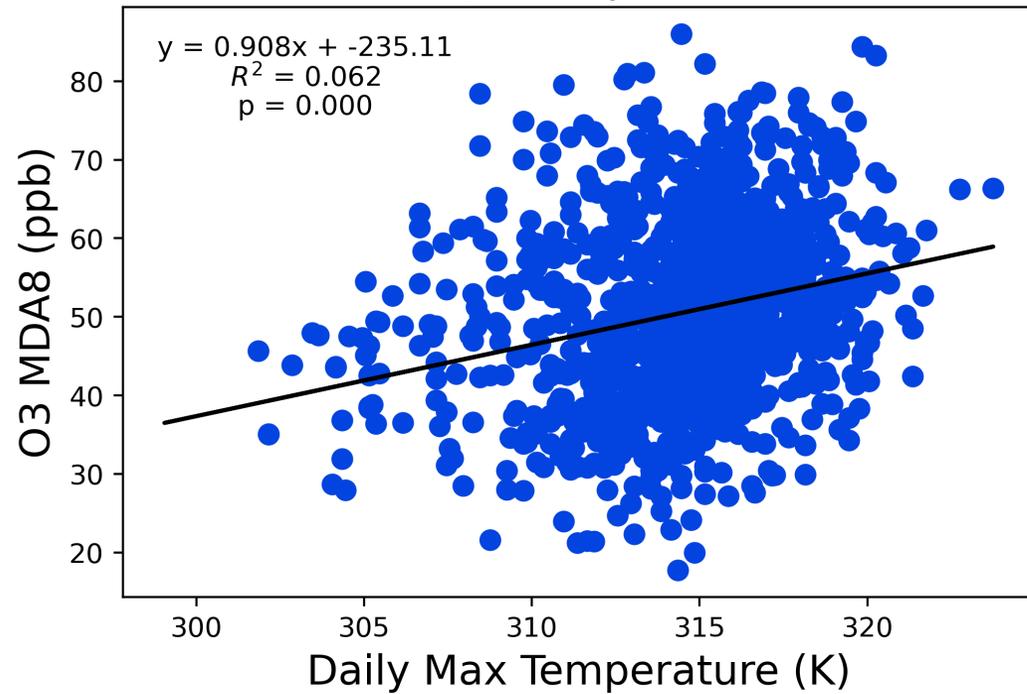


Fresno Jun-Sept 2012-2013

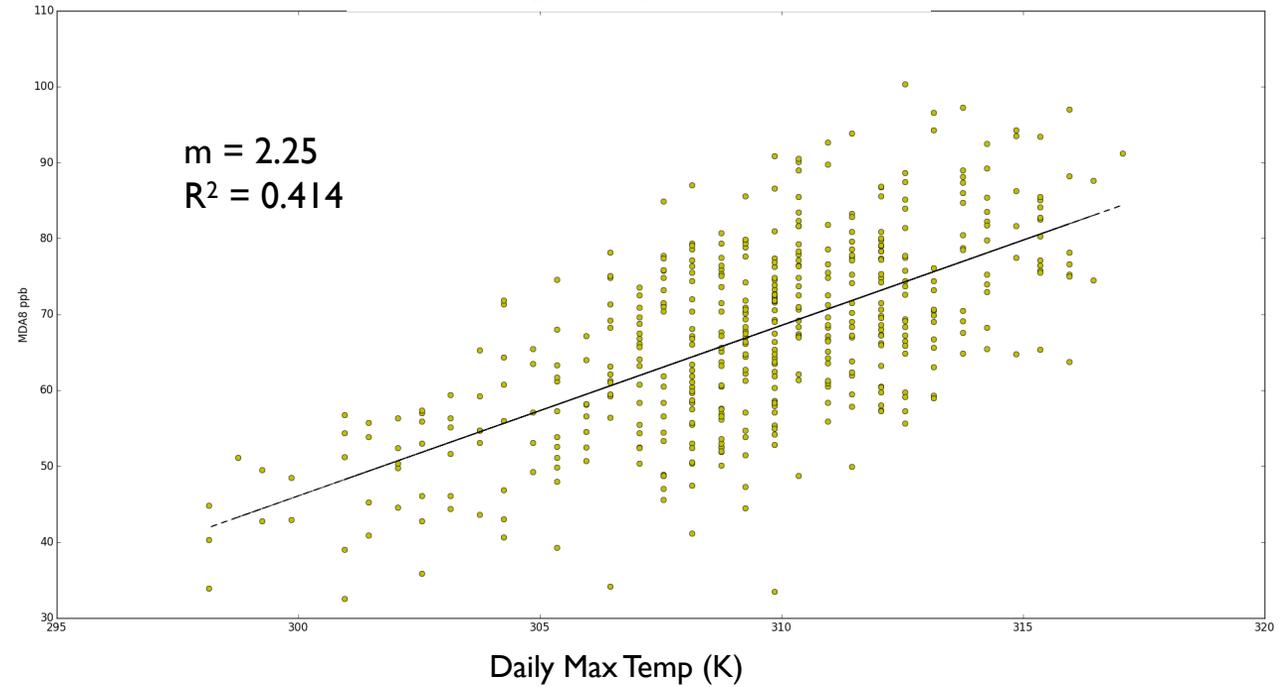


El Centro compared to SJV sites

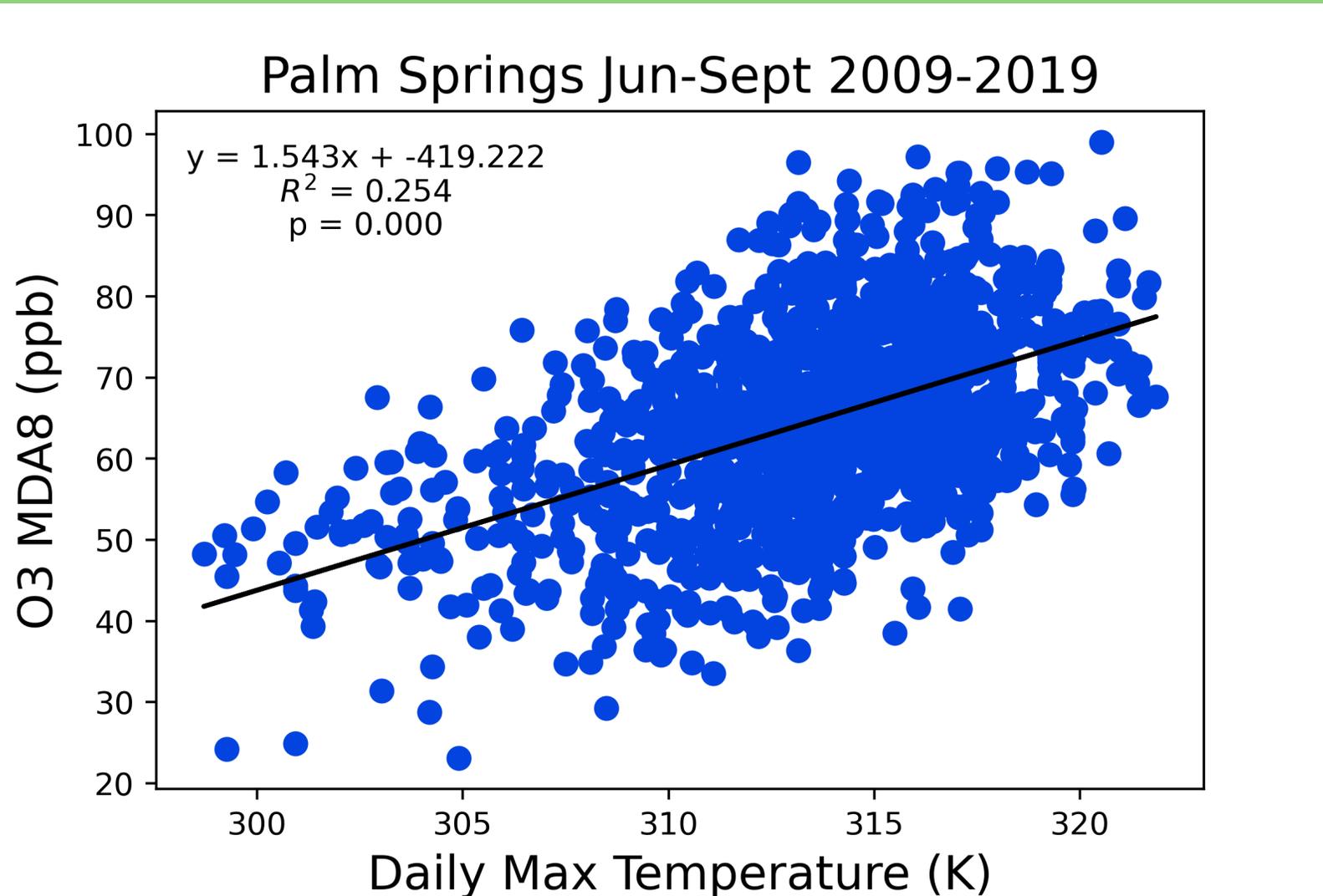
El Centro Jun-Sept 2009-2019

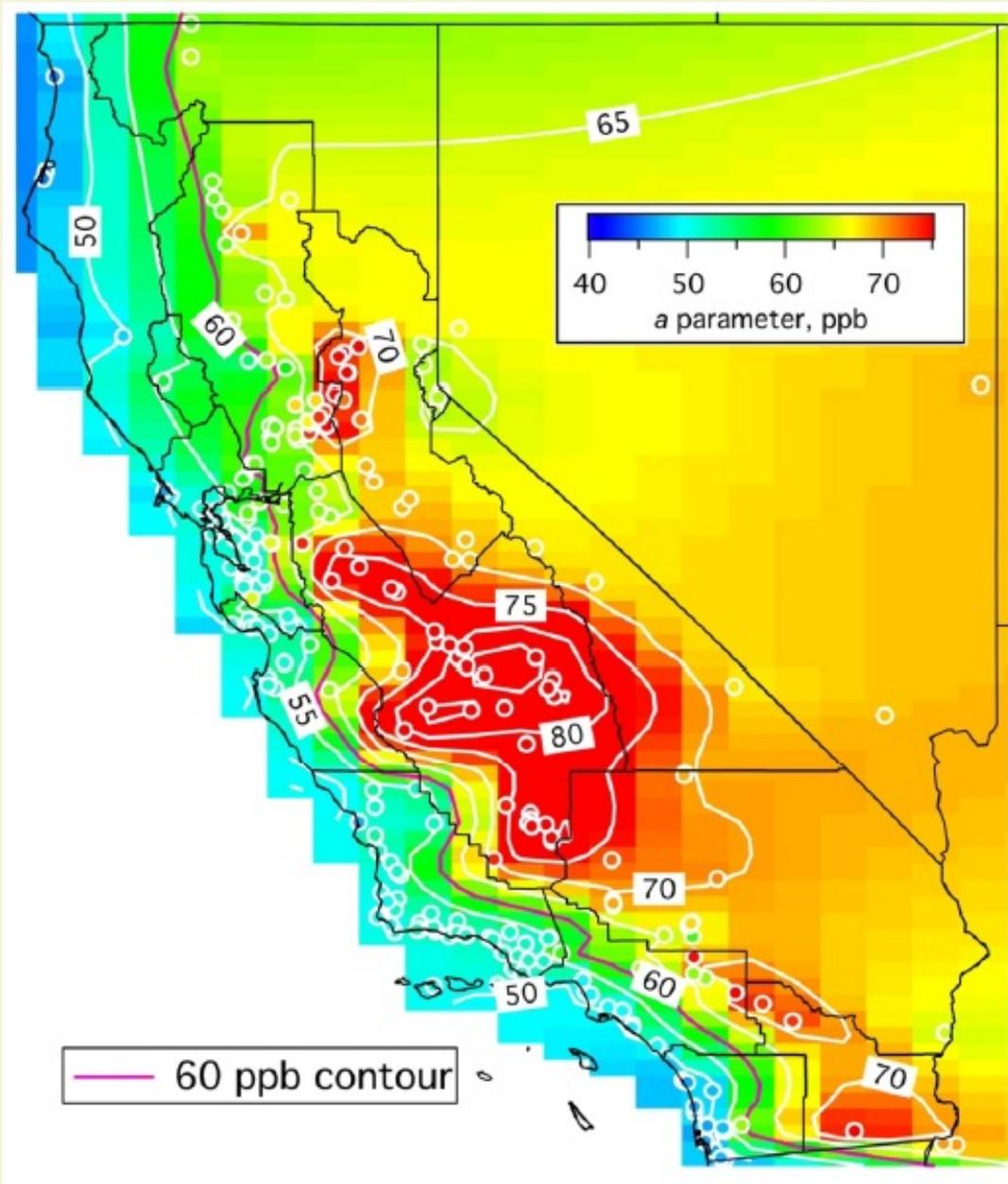


Fresno Jun-Sept 2012-2013



Palm Springs – other areas in the air basin
do not share the trend





Contour map developed from a parameter values

$$ODV = a + 0.20t - 0.018t^2 + Ae^{-t/\tau}$$

$t = \text{year} - 2000$

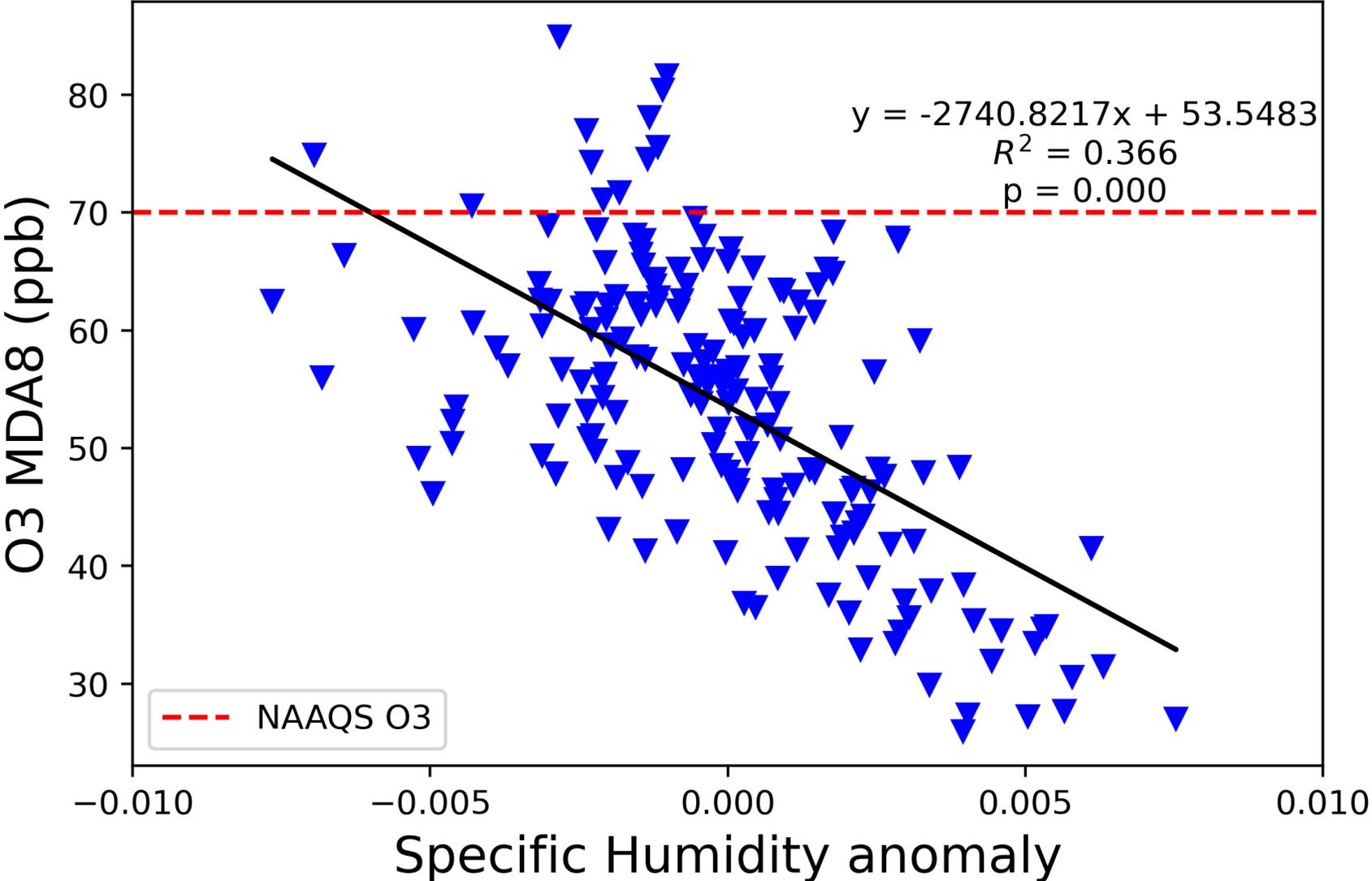
$a = \text{magnitude of US background ODV in 2000}$

$A = \text{magnitude of the ODV enhancement}$

ODV = Ozone Design Value

Site	a	A	RMSD
Mojave Desert AB			
Hesperia	61 ± 8	56 ± 8	5.7
Victorville	68 ± 5	35 ± 4	4.3
Mojave	72 ± 8	23 ± 10	3.4
Barstow	70 ± 3	19 ± 3	3.0
Trona	70 ± 5	11 ± 4	3.8
Blyth	65 ± 3	0	3.0
Salton Sea AB			
Palm Springs	73 ± 4	34 ± 3	3.4
Indio	73 ± 8	21 ± 6	6.7
El Centro	77 ± 8	7 ± 6	6.4
Yuma AZ	70 ± 3	8 ± 2	2.0

April – September 2009-2019



QUESTIONS?

Emails

hclieb@ucdavis.edu

icfaloona@ucdavis.edu

5. Discussion/Information

Items:

A. Update of ICAPCD Policies (ICAPCD)



AIR POLLUTION CONTROL DISTRICT

POLICY: INSPECTION PROCEDURES AND GUIDELINES

EFFECTIVE: October __, 2022 (tentative)

POLICY NUMBER: 16

GENERAL:

This policy and procedure document will provide guidance to Air Pollution Control (APC) inspectors regarding conducting stationary source inspections on behalf of the Imperial County Air Pollution Control District (ICAPCD). APC inspectors are responsible for performing detailed inspections of source operations to determine compliance with ICAPCD, State and Federal requirements. This policy provides staff with specific criteria for verifying compliance with regulations. This policy shall be followed in all inspections regardless of the size of the source or purpose of the inspection to ensure consistency among ICAPCD staff.

POLICY STATEMENT:

ICAPCD Rule 108, *Inspections*, cites the authority for conducting inspections for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations, to ensure that required records are being kept, and to conduct tests of air pollution sources. In many cases, the inspector may be the only person from the ICAPCD who visits a particular site or witnesses the operation of specific equipment, whether or not the source has a valid permit. The method the inspector used for conducting inspections and determination of compliance must be uniform in order to ensure consistent enforcement of ICAPCD Rules. This policy will also ensure the inspector provides good customer service and acts in a professional manner.

I. GENERAL INSPECTION PROCEDURES

A. Pre-Inspection Preparation

Inspectors should spend adequate time preparing for an inspection. Review of the compliance history in Permits Pro Database Program is necessary. The review shall include, but is not limited to, past inspections, complaints, Notices of Violations (NOVs), breakdowns, Title V reports including deviations and source test documentation. Review of the current Permit to Operate (PTO) and Authority to Construct (ATC) conditions is also necessary.

Inspectors need to gather all equipment necessary to conduct the inspection. This may include safety equipment (PPE), County Identification, ATC and PTO conditions, other written documentation reviewed in Permits Pro, approved forms for visible emissions observations, camera, and a cell phone.

B. Safety

Policy 23, *Safety While Conducting Inspections*, discusses this subject and should be referred to.

C. Right to Entry

Policy 24, *Access to the Facility*, discusses this subject and should be referred to.

D. Unannounced Inspections

Policy 26, *The Unannounced Inspection*, discusses this subject and should be referred to.

E. Sign-in at Facilities

Many facilities require the inspector to sign and date a log or other type of sign-in sheet. This is appropriate only if the signature does not limit the liability of the facility in regards to the safety of the inspector or limit the access to any area of the facility or access to specific records. If either of the aforementioned are the reason for the signature, contact your supervisor for guidance.

F. Sensitive and/or Confidential Information/trade Secrets

The inspector can request information that may be considered sensitive, confidential or trade secret during the inspection. Unless necessary and relevant to a violation, this information will remain confidential and any written documentation will be labeled as such by the facility representative (permit holder), so long as the documentation/information meets the requirements of ICAPCD Rule 102, *Public Records*.

G. Frequency of Inspections

It is the policy of the ICAPCD that all sources which operate under an ICAPCD permit be inspected at least once per year. Certain sources require more frequent inspection based upon their potential to emit or actual emissions. Major source facilities, which hold a federal Title V permit and those which qualify as synthetic minor sources, shall be inspected twice each year.

H. Source Test Observation and Enforcement

Source tests are conducted for the purpose of demonstrating compliance with ICAPCD rules, state or federal regulations, ATC or PTO emission limits, special agreements, or gathering emissions data. For detailed procedures regarding source testing, please refer to ICAPCD Policy 16.A, *Approval, Observation, and Evaluation of Source Tests*.

I. Inspection Reports

The inspector shall complete an Inspection Report for each inspection conducted and submit the document to the Enforcement Division Manager for review and approval within thirty (30) days after the inspection takes place, unless the inspector has yet to receive a final source test report from the source/permittee needed for his/her report. Finally, the Enforcement Division Manager may grant an extension of time for completing and submitting the report upon request by the inspector.

II. ON SITE INSPECTION PROCEDURES

Since every facility or process is different, specific inspection procedures will depend on the type of facility being inspected. Inspectors should use their own observations and the statements obtained during conversations or interviews with facility employees to determine if the facility is in compliance with ICAPCD rules and requirements. The inspector's job is to adequately document the compliance status of the facility. Documentation may consist of photos, observations, notes, reports, samples, statements, and/or records.

A. Opening Conference

An opening conference provides an opportunity for the inspector to explain the scope of the inspection and gather general information regarding the facility operations, management structure (to confirm ownership), and any special safety concerns. The inspector should explain the need to take photographs of various equipment, emissions sources, and control equipment. The inspector should also determine if the facility wants to take duplicate samples, if necessary. The inspector should document the name and title of the individual who granted permissions for the ICAPCD Inspection, and also request that a facility representative accompany him/her on the inspection.

B. Physical Inspection

The physical inspection will be conducted as the facility representative accompanies the inspector throughout the facility. The inspector will direct the inspection by asking to see specific equipment, records or processes using the ATC or PTO conditions as a guide. Observing and asking critical questions about the equipment and processes will help the inspector to determine compliance with ICAPCD rules and permit conditions.

1. Identify Emission Points

Using the ATC and PTO Conditions and equipment list as a guide, identify all emissions and potential emission points. Observe the equipment or process and note the state of operation. Record any visible emissions observed using Visible Emission Evaluation form(s) and procedures if necessary.

2. Equipment Description

Confirm that the equipment description on the current ATC or PTO equipment description list accurately describes the equipment or process permitted. This information includes, but is not limited to, confirming serial numbers, model numbers, the manufacturer, horsepower/capacity, and other listed specifications. If the equipment description is incomplete or inaccurate, the inspector will issue a NTC or NOV as appropriate. Additionally, the inspector will instruct the facility to submit a new permit or permit modification application to the ICAPCD to address the discrepancy.

3. Applicable ATC or PTO Conditions/Rules and Regulations

Use the ATC or PTO conditions as a guide for determining compliance when observing permitted equipment. Each piece of permitted equipment shall meet all conditions in the current ATC or PTO. If the permitted equipment does not meet a condition(s) in the current ATC or PTO, the inspector will issue a NTC or NOV. Some examples of relevant information include:

- Current hours of operation and status of equipment
- Process rate information (current, minimum/maximum, annual)
- Type and rate of fuel being burned
- Current gauge reading
- Waste handling

4. Recordkeeping

Some records are maintained at the physical location of the equipment. Discussing the records that are required for a piece of equipment can help determine where the records are maintained. If records are at the equipment location, review them and note any deficiencies or violations. Other records may be maintained in a facility office or on a facility computer. Review these during the post-inspection interview. Inspectors may request three years of records for non-Title V facilities and five years of records for Title V facilities, but should at a minimum review records created on or after the date of the last inspection. In the event the inspector discovers a violation while reviewing the facility's records, the inspector will issue a NTC or NOV to the facility.

5. Unpermitted Equipment

During the course of the inspection, be alert to any equipment that may potentially emit air contaminants that is not currently permitted. This may include an entire new piece of equipment or equipment that has been added on to existing, permitted equipment. If an inspector is unsure if equipment requires a permit, contact an engineer at the Permitting Division to verify if it needs to be permitted. Additionally, the inspector will log the unpermitted equipment information in their Inspection Report to properly track the equipment/emission point year-to-year, and re-inspect the unpermitted equipment each subsequent year to verify the equipment's exempt status remains valid. If the equipment in question does

need to be permitted, an NOV shall be issued and a permit application given to the facility.

6. Waste Handling

Waste materials must be handled in a way so as to limit the amount of emissions released. Determine the types and amounts of waste materials being stored and shipped off-site, how the materials are being stored or used, and the location where the waste materials are being shipped.

7. Documentation During the Inspection

Documentation in the form of photos (e.g. photos of engine hour meter, fuel flow meter, Magnehelic gage, etc.), notes, and copies of records should be obtained during the inspection. Approved ICAPCD forms appropriate for the type of equipment observed shall be completed as thoroughly as possible during the inspection.

C. Statements

Record statements pertinent to the inspection at hand, which have been made by any of the involved parties, including the facility operator, employees, the public and/or the compliance inspector. Use direct quotes whenever possible. Record the date and time of conversations, and who made the statement(s).

D. Post Inspection Interview

The following elements should be covered with the owner/operator in a post-inspection meeting. This meeting should be conducted after the inspection.

1. Review the ATCs, PTOs, and/or Portable Equipment Registration Certificates, including the requirements to keep copies available near the permitted equipment (if applicable). Emphasis should be placed on the requirement for compliance with stated permit conditions.
2. Review with the facility representatives the results of equipment inspection.
3. Review records and advise the owner/operator of any deficiencies/violations.
4. Issue appropriate documentation (i.e., NOV or NTC) and review compliance options.
5. Review annual or semi-annual reporting requirements and submittal dates.
6. For Title V sources, review deviation reporting requirements.
7. Refer the facility to the ICAPCD's website for obtaining forms, applications, current rules and policies. Inform them they can keep up to date on rule changes and ICAPCD meeting dates, and find bulletins and other helpful information at the ICAPCD's website.

8. Ask if there is any additional assistance the ICAPCD can provide.

Belen Lopez
Air Pollution Control Officer

DRAFT



AIR POLLUTION CONTROL DISTRICT

POLICY: Approval, Observation, and Evaluation of Source Tests

EFFECTIVE: October __ 2022 (tentative)

POLICY NUMBER: 16.A

GENERAL:

This District Policy provides guidance to Imperial County Air Pollution Control District (ICAPCD) Staff with their observation of source tests, and enforcement actions by Staff pertaining to source tests. Source tests are carried out by permittees for a variety of reasons, including but not limited to, demonstrating compliance with specific ICAPCD rules, state regulations, permit conditions, or compliance plan agreements. A permittee is generally required to administer an initial source test once their new/modified equipment, regulated under an Authority to Construct (ATC), is fully constructed and operable, in order to demonstrate compliance with applicable emissions limits. After the permitted equipment's initial test, the permittee is required to test the equipment on an annual basis, or based on the schedule per the equipment's Permit to Operate (PTO). The ICAPCD may also require the permittee to conduct a source test at any other time in order to demonstrate compliance or quantify emissions from the permitted equipment.

ICAPCD Staff reviews source test plans, observes source tests, and reviews source test results to ensure that the results are representative, accurate, and precise. ICAPCD must have confidence in the quality of the test results to determine compliance, and evaluate emission controls. The primary responsibilities of ICAPCD Staff, as described in this Policy, consists of the review and approval of source test plans, preparation for source test observations, observing source tests, reviewing source test report results, and compliance/enforcement assessments.

SOURCE TEST PLANS:

1. Prior to a permittee conducting any source test, the permittee shall submit a source test plan (STP) to the ICAPCD for review and approval. The permittee must fulfill this requirement for each required source test (initial start-up, annual, etc.). The STP must be developed by an independent third party tester (source tester), and the same independent third party tester shall administer the source test on the behalf of the permittee. If the ICAPCD does not approve a STP, the test results become invalid, and the permittee will need to re-do the source test upon receiving approval from the ICAPCD.
2. The permittee, or their independent third party tester, shall schedule all source tests to occur during daylight hours, Monday-Friday (excluding State and federal holidays), in order for ICAPCD Staff to observe the source test. If scheduling a source test during this timeframe results in compromising operational conditions or the safety of testing personnel, the permittee or third party tester shall present alternate

arrangements/scheduling to the ICAPCD, prior to testing, and preferably in the STP. During the test, ICAPCD Staff shall be granted access to:

- A. Real time data collected by testing contractors
 - B. Operational and/or process information from the source
 - C. Testing platforms and testing apparatus
 - D. Any other location District personnel deem necessary to validate testing operations
3. The permittee is required to submit the STP to the ICAPCD at least 30 days prior to the proposed test date. If the permit is specific in the required time of submittal and the STP is not submitted on time, the ICAPCD may require the permittee to postpone the source test. Additionally, enforcement action shall be taken by the ICAPCD with the issuance of a Notice to Comply (NTC), if it is a first-time offense by the permittee, or Notice of Violation (NOV), to the permittee. If the permit is not specific about the STP submittal, ICAPCD Staff (APC Engineer or Inspector) will determine if the submittal date allows sufficient time for review based upon current workload, complexity of the testing, urgency in obtaining emissions data, and other factors. If ICAPCD Staff determines that the STP cannot be reviewed on time, the test must be postponed. The STP must be reviewed for consistency with permit conditions (load requirements) and established source test methods (i.e. U.S. EPA or CARB Test Methods). ICAPCD Staff shall also verify the source tester's credentials, using CARB's Independent Contractor Program List, or other applicable tester resources/databases. In all cases, prior to the initiation of the test, ICAPCD must approve the STP in writing (via email or letter) to the permittee. Either an APC Engineer or APC Division Manager has the authorization to approve an STP.

OBSERVING SOURCE TESTS:

1. ICAPCD Staff must verify that the STP is correctly implemented. ICAPCD Staff must be familiar with the source permit, ICAPCD policy, applicable rules, the STP, the test methods to be used, and any other documentation that are relevant to the STP. The source shall contact the ICAPCD Staff member assigned to witness the source test at least five (5) days prior to the source test to confirm the test date and the specific start time of the test. ICAPCD Staff shall be present during the source test. If ICAPCD Staff is not present, ICAPCD shall classify the test as invalid, unless the permittee obtains prior ICAPCD approval. ICAPCD Staff is not required to be present during the entire source test for the test to be validated; however, it should be up to the Staff member to determine the period of time that he/she will be at the source test site. For all source tests, ICAPCD Staff shall witness a minimum of one complete source test run.
2. ICAPCD Staff must determine if each part of the source test program is consistent with the STP. If a procedure or piece of equipment is significantly different than that contained in the STP (different CARB/EPA test being administered, different make/model of the equipment, etc.), ICAPCD Staff shall inform the source operator and the third party tester. Of particular concern is the level of operation of the equipment (power rating) during the source test relative to the permitted level or the level required by permit conditions. Since tests are usually intended to be conducted at the maximum load allowed by permit conditions (unless ICAPCD has approved a lower load), ICAPCD Staff must verify that the equipment is operating at the proper level. The approved STP is the primary guideline to determine the validity of the test program. ICAPCD Staff observing the test, or an APC Division Manager, must approve all deviations from the STP or the referenced test methods prior to test implementation.

REVIEWING TEST REPORTS:

1. The ICAPCD Staff member reviewing the test report should be the same person who observed the source test. In the event somebody other than the ICAPCD Staff member who observed the test reviews the test report, ICAPCD Staff should get the test observation notes from the Staff member who attended the test. The reviewer should determine the date of test report submittal and verify that it complies with the source permit conditions. Generally, the permittee (or their third party tester) must submit the test report to the ICAPCD within 30 days of the date in which the source test was completed, per the equipment's permit conditions in its ATC or PTO. If the permittee submits the test report after the required permitted deadline, then ICAPCD Staff shall issue a NOV to the permittee.
2. The ICAPCD Staff reviewer must be familiar with the STP and the source permit. The reviewer shall verify that the test program has satisfied the requirements of the permit, specifically evaluating the test report to confirm that the source test fully satisfied the STP and followed all applicable test procedures per the cited ICAPCD Rule(s), U.S. EPA or CARB Test Procedure(s), CARB Executive Order(s) for Vapor Recovery Systems, etc. The reviewer shall check the raw data, data reduction procedures, data transformation, and calculations for at least one test run of each test type. For instrument testing, this will include checking that the strip charts were read correctly, the calibration drift is acceptable, the pollutant values are correctly calculated and averaged, and the mass emission values are correctly calculated.

COMPLIANCE DETERMINATIONS:

1. A source test generally includes three separate test runs, with each of the three test runs forty to sixty minutes in length. Compliance with permit limits or ICAPCD rules are determined by comparing the applicable emission limit with the average of the three source test runs, with this average rounded to the same number of significant figures as the emission limit. If one test run exceeds the emission limit, but the average of the three runs indicates compliance, then ICAPCD deems that the source is in compliance with the permit limit (for all test types). If the first test run indicates noncompliance, the permittee is not allowed to change operations to induce the average of the three runs to indicate compliance. Since a mid-test change in operations is not consistent with the STP, any such change not pre-approved by the ICAPCD invalidates any subsequent tests.
2. When a source fails a required annual source test, ICAPCD shall issue a NOV to the permittee. If the purpose of the source test is to verify emission limits in a new permit (Rule 213, Temporary Permit to Operate) or is the initial test to verify emission limits in a re-evaluated permit, the ICAPCD might not pursue enforcement action. An ICAPCD Division Manager will make this determination, on a case-by-case basis, after reviewing the test report and staff observations for the new/re-evaluated permit that required the source test. The permittee must follow up a failed source test with a repeat test to verify compliance, which follows the previously ICAPCD approved STP, on a separate future date after the original failed source test date. If the permittee believes they are or will be in violation, the permittee may seek variance protection from enforcement action.
3. For sources with continuous emission monitoring systems (CEMS), the annual source test of the emissions unit/source will generally take place on the same date(s) as source's

CEMS certification audit (required per 40 CFR Part 60, Appendix B). Due to the acceptable accuracy deviation allowed for CEMS, it is possible that the source test will indicate noncompliance while the CEMS for the same source simultaneously indicates compliance. If such a situation occurs, the test data of the emissions unit/source takes precedent over the CEMS certification audit data for determining compliance. Conversely, if the CEMS certification audit data indicates a violation while the test data of the emissions unit/source demonstrates compliance, an ICAPCD Division Manager will review the specific case to make a final compliance determination.

Belen Lopez
Air Pollution Control Officer

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