

Scott Johnson
848 Stannage Avenue, Apt.
Albany, CA 94706
October 20, 1995

California Environmental Protection Agency
Air Resources Board
2020 "L" Street
Sacramento, CA 95812

RE: COMMENTS ON NOTICE OF PROPOSED AMENDMENTS TO THE
DESIGNATION CRITERIA AND TO THE AREA DESIGNATIONS FOR
STATE AMBIENT AIR QUALITY STANDARDS

Dear Board Members:

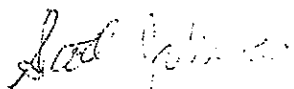
I have several comments on the Air Resources Board proposed regulations noticed in the California Regulatory Notice Register 95, Volume No. 39-2, page 1585. In that notice, your board proposed to amend the designation criteria and the area designations for state ambient air quality standards.

I find most of your proposed changes unproblematic. They seem to simply improve the Board's practices and procedures, providing greater efficiency for your staff and clarity for those parties seeking to comply with your regulations. In particular, your proposed changes to the area designations seem like a good idea.

Nevertheless, your proposal to change the designation criteria with regard to an "unusual concentration event" concerns me. Your Board proposes to exclude exceedances (classified as an "unusual concentration event") from the designation process. As I understand your proposal, an "unusual concentration event" is a highly irregular or infrequent event where the ambient air quality exceeds the attainment standards for the area. While the unusual concentration event may be a limited, local or one-time event, the effects of the poor air quality during the event are quite serious. Simply because an event is brief or limited in scope does not reduce the effect of the event on those residents living in the area. People with weak or vulnerable respiratory system (for example, asthmatics) may experience an "unusual concentration event" as a life-threatening emergency. When designating the air quality standards for an air basin, the regulators should not be allowed to simply disregard an outlier air pollution event simply because it is an "unusual concentration event."

Because of the problem with the "unusual concentration event" provision, I request that the Board not adopt these proposed regulations.

Sincerely yours,



Scott Johnson



MONTEREY BAY

Unified Air Pollution Control District

servicing Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER
Doug Quetin

24580 Silver Cloud Court • Monterey, California 93940 • 408/647-9411 • FAX 408/647-8301
November 2, 1995

Rich Bradley
Air Resources Board
P. O. Box 2815
Sacramento, CA 95812

95-12-1
11/16/95

RECEIVED
NOV 16 1995
SB NON

STATE OF CALIFORNIA
AIR RESOURCES BOARD
RECEIVED 11/7/95
BY BOARD SECRETARY
XC: Board members
JDD mts
JB Legal
TSD

SUBJECT: PM10 DATA USED FOR DESIGNATION PURPOSES

Dear Mr. Bradley:

Thank you for the opportunity to comment on ARB's report "Proposed Amendments to the Designation Criteria and to the Area Designations for State Ambient Air Quality Standards", dated September 1995. The Monterey District greatly appreciates the work of ARB in compiling and analyzing the massive amounts of air quality data gathered statewide by the various local districts, including our own, which is summarized in the subject 1992-1994 triennial report.

We do have two concerns regarding the local PM10 data used for designation purposes that we would like to bring to your attention. Specifically, these involve source impacted and fire impacted data which have apparently been incorporated into the data base used for regional designation purposes. Use of such inflated numbers can of course result in regional Designation Values (DV) which are too high.

These concerns are outlined in further detail below:

1. Source Impacted PM10 Data - The PM10 stations at Davenport and King City were originally established with the objective of monitoring the impact of specific sources on air quality in the immediate vicinity of the facilities. Locally, the District regards these sites as industrial source influenced stations for PM10 and have never considered data from these sites representative of regional scale conditions.

The specific industrial facilities associated with these monitors are the RMC Lonestar cement plant in Davenport and the Basic American Foods cogen plant in King City. The Davenport (4400851) and King City (2700551) sites were established to satisfy District Rule 207 permit conditions requiring post construction compliance monitoring.

CHAIR:
Alan Styles
Salinas

DISTRICT BOARD MEMBERS

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As shown on pages 9 and 10 of the September 1994 "State and Local Air Monitoring Network Plan", these monitors are designated as Special Purpose (SP) sites rather than SLAMS or NAMS sites. The monitoring objective for these sites is to monitor the Highest Concentration (HC). More specifically, the objective involves the HC associated with a source specific impact.

We request that you delete data from these stations from the data base used for regional scale designation purposes. Data from the Davenport and King City PM10 stations are listed on page F-23 of the triennial report.

2. Fire Impacted PM10 Data - During the Fall of 1993 there were a series of major wildfires both in southern California and in the Los Padres National Forest which impacted our local monitoring sites. In particular, the PM10 observations obtained on 10/28/93 in the NCCAB were unusually high due to the fire influence. Although these observations were footnoted on the Data Summary Reports (see enclosures) as being fire affected, the 10/28/93 observations for Hollister ($61 \mu\text{g}/\text{m}^3$) and Watsonville ($60 \mu\text{g}/\text{m}^3$) are somehow still listed as the Designation Values for these sites on page F-23 of the triennial report.

It is our understanding that under ARB's Exceptional Events policy (page 7 subject report), forest fire affected data are specifically listed as data to be excluded from consideration in developing regional DVs. We therefore request that ARB delete these specific observations from the DV data base as well as all NCCAB PM10 observations acquired on 10/22/93 and 10/28/93. We also suspect that a $49 \mu\text{g}/\text{m}^3$ observation acquired on 11/3/93 from Watsonville was affected by fire related PM10.

Thank you again for the opportunity to comment on the triennial report. Please feel free to call Bob Nunes of our Planning and Air Monitoring Division if you have any questions.

Sincerely,

Doug
Doug Quetin
Air Pollution Control Officer

cc: Janet Brennen
John Fear
Robert Nunes

Enclosures

MBUAPCID

CALIFORNIA AIR RESOURCES BOARD
Regional Services Division, EDP Management
P.O. Box 2815, Sacramento, CA 95812
24 HOUR DATA SUMMARY REPORT

Address: 1979 FAIRVIEW ROAD

Location Name: HOLLISTGM

Recorded By: SCOTT NORTON Date: 11/15/93

Checked By: JS FEAR Date: 11/29/93

ACTION 2	COUNTY 35	SITE 00823	AGENCY I	PROJECT 11
INTERVAL 8	YEAR 93	MONTH 10		

FILE 440-3
X-FILE

LOCAL CONDITION CODES* (ENTER CODE FOR APPROPRIATE DAY IN BOX 40 BELOW)

- A: NO UNUSUAL CONDITIONS
- B: WIND-BLOWN SAND/DUST
- C: CONSTRUCTION NEARBY
- D: FARMING OPERATION NEARBY
- E: FIRE NEARBY
- F: SAMPLER MALFUNCTION (EXPLAIN ON BACK)
- Z: OTHER (EXPLAIN ON BACK)

DATA SHOWN ON THIS DOCUMENT ARE PRELIMINARY AND SUBJECT TO REVISION OR DELETION

SAMPLING START DAY 31-32	TOTAL SUSPENDED PART. NAME POLLUTANT OBSERVED CODE				LEAD NAME POLLUTANT OBSERVED CODE				PM-10 NAME POLLUTANT OBSERVED CODE				NAME POLLUTANT OBSERVED CODE				*										
	12	13	14	15	16	12	13	14	15	16	12	13	14	15	16	12		13	14	15	16						
	1	1	1	0	1	1	2	1	2	3	8	1	1	0	2												
	ANALYSIS METHOD				ANALYSIS METHOD				ANALYSIS METHOD				ANALYSIS METHOD														
	METHOD	UNITS			METHOD	UNITS			METHOD	UNITS			METHOD	UNITS													
	17	18	19	20	17	18	19	20	17	18	19	20	17	18	19	20											
	INSTRUMENT NO.				INSTRUMENT NO.				INSTRUMENT NO.				INSTRUMENT NO.														
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	CONC.				CONC.				CONC.				CONC.														
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Reporting Agency: MKBURCID
 Station Address: 444 AIR PORT BLVD.
 Station Name: WATSONVILLE
 Recorded By: JODY SOTGLO Date: 11/15/93
 Checked By: J S FGM Date: 11/29/93

QUALITY ASSURANCE AND RESOURCES DIVISION
 Environmental Services and Data Management
 P.O. Box 2027, San Francisco, CA 94133

24 HOUR DATA SUMMARY REPORT

ACTION: 2
 COUNTY: 44
 SITE: 00852
 AGENCY: I
 PROJECT: 11
 INTERVAL: 8
 YEAR: 93
 MONTH: 10

4290-2

LOCAL CONDITION CODES* (ENTER CODE FOR APPROPRIATE DAY IN BOX 40 BELOW)
 A: NO UNUSUAL CONDITIONS D: FARMING OPERATION NEARBY F: SAMPLER MALFUNCTION (EXPLAIN ON BACK)
 B: WIND-BLOWN SAND/DUST E: FIRE NEARBY Z: OTHER (EXPLAIN ON BACK)
 C: CONSTRUCTION NEARBY

DATA SHOWN ON THIS DOCUMENT ARE PRELIMINARY AND SUBJECT TO REVISION OR DELETION

SAMPLING START DAY 21-32	TOTAL SUSPENDED PART.					LEAD					PM-10																	
	NAME POLLUTANT OBSERVED CODE					NAME POLLUTANT OBSERVED CODE					NAME POLLUTANT OBSERVED CODE					NAME POLLUTANT OBSERVED CODE												
	12	13	14	15	16	12	13	14	15	16	12	13	14	15	16	12	13	14	15	16								
	1	1	1	0	1	1	2	1	2	3	8	1	1	0	2													
	ANALYSIS METHOD					ANALYSIS METHOD					ANALYSIS METHOD					ANALYSIS METHOD												
	METHOD		UNITS			METHOD		UNITS			METHOD		UNITS			METHOD		UNITS										
	17	18	19	20		17	18	19	20		17	18	19	20		17	18	19	20									
	INSTRUMENT NO.					INSTRUMENT NO.					INSTRUMENT NO.					INSTRUMENT NO.												
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AIR POLLUTION CONTROL DISTRICT

November 9, 1995

Board Secretary
California Air Resources Board
P.O. Box
Sacramento, CA 98512

Dear Sir/Madam:

The attached written testimony from Imperial County Air Pollution Control District is provided for the public hearing to consider amendments to the criteria for designating areas of California as nonattainment, attainment, or unclassified, amendments to the area designations for the state ambient air quality standards, and amendment to the San Joaquin Valley and Sountheast Desert Air Basin Boundaries.

Due to conflicting schedules Imperial County APCD staff is unable to attend. Thank you for the opportunity to provide these comments. Questions regarding this testimony may be addressed by calling either Gaspar Torres or Miguel Monroy at 619-339-4606.

Sincerely,



Stephen L. Birdsall
Air Pollution Control Officer

Attachments

WRITTEN TESTIMONY ON PROPOSED REDESIGNATION OF THE IMPERIAL COUNTY AS NONATTAINMENT FOR CARBON MONOXIDE BASED ON EXCEEDANCES REGISTERED AT THE CALEXICO-ETHEL SLAMS SITE LOCATED IN CALEXICO.

Let me preface this written testimony by saying that Imperial County APCD staff would like to be present here today to testify but due to conflicting schedules are unable to attend. We would also reserve the right to present oral and visual testimony in the future.

The California Air Resources Board Monitoring & Laboratory Division, Site Initiation/Termination Report for the Calexico-Ethel SLAMS monitoring station, site #13-00-698 lists the reason(s) for establishing the air monitoring site as follows: "To determine the impact of air pollutant transport from Mexico into the Imperial Valley, the Grand Canyon and other environmentally sensitive areas, to help quantify pollutant transport from the maquiladores and population growth on the Mexican side of the border." (See Attachment A)

Based on this report the ICAPCD agreed to, and did, work closely with the ARB to establish the Calexico-Ethel monitoring station. Unfortunately there was a lack of communication between the ARB and the ICAPCD and we were unaware that the mission behind the monitoring station changed. We were made aware of the proposed redesignation of the Imperial County to nonattainment for CO from an ARB public notice. Had communications between the two agencies been better we believe this process would not have gotten as far as it has.

The ICAPCD feels that the monitoring station did the job that it was originally designed to do, and that the CO exceedances at the Calexico-Ethel monitoring site are directly caused by cross border vehicle traffic from Mexico. The CO exceedances in Calexico are like no others in the State. There are no stationary sources of CO in Calexico, nor is Calexico impacted by CO transport from another district. The source of CO in Calexico is a foreign country which we, ARB, or U.S.EPA, have absolutely no control over.

The Calexico-Ethel monitoring station is located .9 miles from the port of entry and .7 miles from the U.S. Mexico border (see attachment B). Every day 11,000 vehicles cross the international border from Mexico into the United States through the port of entry in Calexico. The majority of vehicles crossing into the U.S. are older model cars registered in Mexico. Traffic delays for vehicles entering the U.S. from Mexicali range from 1/2 hour to 4 hours. During the winter months in Imperial County inversion layers are lower and more frequent than any other time of the year. Inversions will start in the afternoon and remain until mid-morning the next day. In January 1989 four family members inside a camper died of carbon monoxide poisoning during a nearly four-hour

wait to cross into Calexico.

The ARB's decision to designate only the City of Calexico as nonattainment and not the entire Imperial County is appreciated. However, since the CO emissions in Calexico are generated in Mexico, they are beyond reasonable regulatory control. Because of this Calexico should also be excluded from the nonattainment designation.

If you should decide today to redesignate the City of Calexico as nonattainment for CO we respectfully request to be exempted from any planning requirements until after further studies have been done, as recommended by ARB.. To require the City of Calexico to mitigate CO would be futile and cause undue economic hardship on its citizens. The solution to the Calexico CO problem can come about only through a bi-national effort, with ARB, ICAPCD and the Mexican Government working together.

And finally, should you decide to impose both the nonattainment and planning requirements on us we request that you delay your decision, and continue this item for one month so that we can appear before you and present oral and visual testimony.

We are in receipt of your letter dated November 2, 1995, (see attachment C) we agree with your statement in paragraph three that a better understanding of the nature of the CO air quality problem in Calexico is needed in order to determine whether a CO planning effort is warranted

CALIFORNIA AIR RESOURCES BOARD
Monitoring & Laboratory Division
SITE INITIATION/TERMINATION REPORT

PRELIMINARY
JED 6-16-94

I. New site or parameters:

Provide reason(s) for establishing air monitoring site or initiating new parameters. Specify applicable federal or state standards, the objectives of the monitoring and expected duration of monitoring.

TO DETERMINE THE IMPACT OF AIR POLLUTANT TRANSPORT FROM MEXICO INTO THE IMPERIAL VALLEY, THE GRAND CANYON & OTHER ENVIRONMENTALLY SENSITIVE AREAS, TO HELP QUANTIFY POLLUTANT TRANSPORT FROM THE MAQUILADORES & POPULATION GROWTH ON THE MEXICAN SIDE OF THE BORDER.

II. INITIATION/TERMINATION DATES:

Begin Date: 6-1-94 End Date: _____

III. Terminate site or parameters:

Provide rea

Post-It™ brand fax transmittal memo 767: # of pages <u>16</u>	
To: <u>GARY SKOUSEN</u>	From: <u>JOHN LAWSON</u>
Co. _____	Co. _____
Dept. <u>MLD-5</u>	Phone # <u>327-2735</u>
Fax # <u>350-6468</u>	Fax # <u>327-8217</u>

ters.

IV. Pollutant Information: (Check appropriate boxes)

Pollutants	Spatial Scale					Monitoring Type			
	Micro	Middle	Neighbhd	Urban	Regional	NAMS	SLAMS	SPM	PSD
O3	X		X				X		
CO	X		X				X		
NO2	X		X				X		
SO2	X		X				X		
PM10	X		X				X		
Lead	X		X				X		

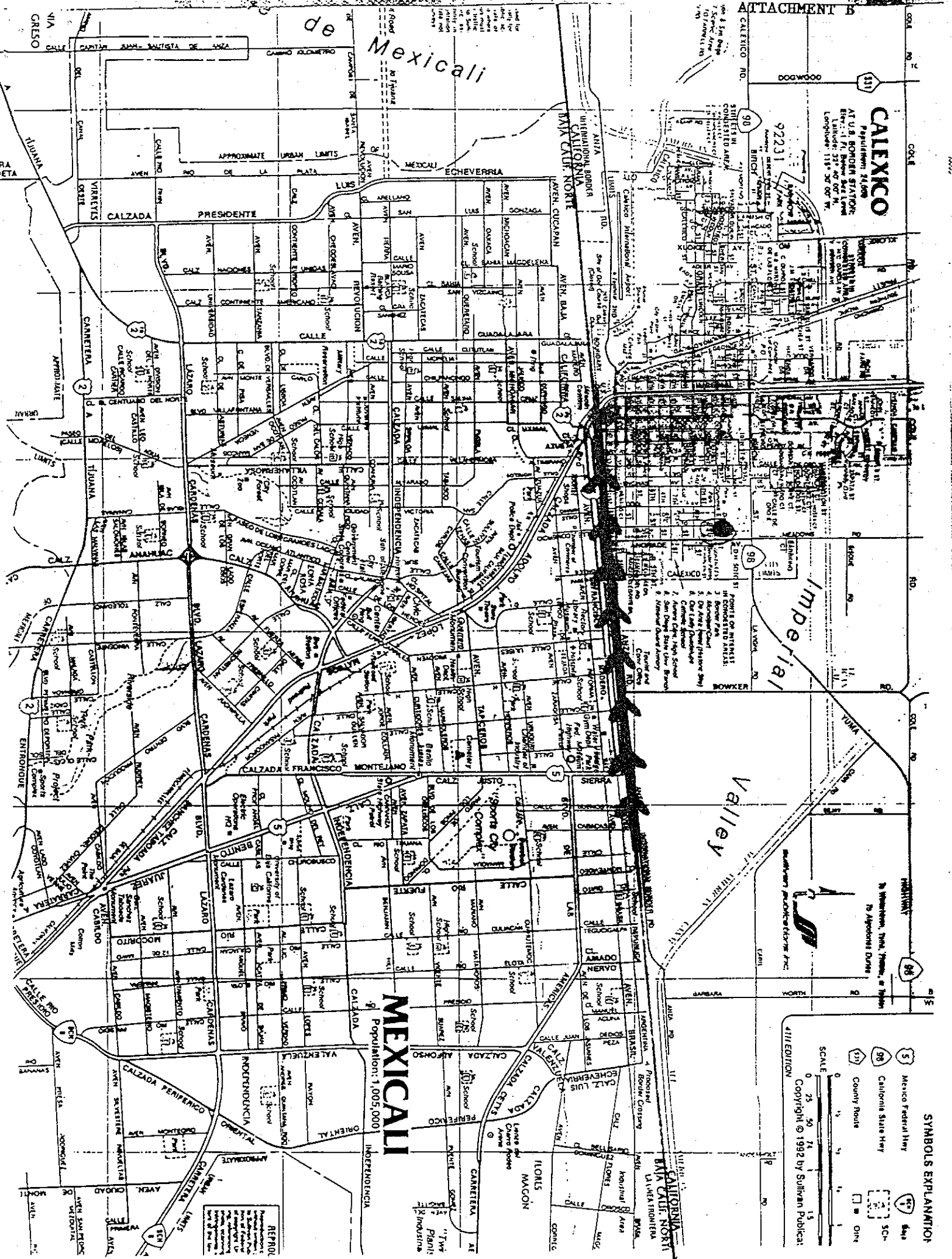
V. Signature(s):

Prepared by: JOHN D. LAWSON
Title: INSTRUMENT TECHNICIAN II
Date: _____

Site Name: CALIXCO - ETHEL
Site Number: 13-00-698
Effective Date: 6-1-94

JED 6-16-94

CALEXICO
Population 14,000
AT U.S. BONDING STATION:
Elev.: 17,300 Feet
Latitude: 32° 47' 00" N
Longitude: 115° 26' 00" W



SYMBOLS EXPLANATION

- (5) Mexico Federal Hwy
- (98) California State Hwy
- (17) County Route
- (57) Bus
- (30) School
- (□) Park
- (■) Other

SCALE
0 25 50 75 150 Feet

4th Edition
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MEXICALI
Population: 1,005,000

REPRODUCTION OF THIS MAP IS PROHIBITED WITHOUT THE WRITTEN PERMISSION OF SULLIVAN PUBLISHERS. A FEE OF \$100.00 WILL BE CHARGED FOR EACH COPY OF THIS MAP REPRODUCED.

AIR RESOURCES BOARD

2020 L STREET
P.O. BOX 2815
SACRAMENTO, CA 95812



November 2, 1995

Mr. Stephen Birdsall
Air Pollution Control Officer
Imperial County
Air Pollution Control District
150 South 9th Street
El Centro, California 92243-2801

Dear Mr. Birdsall:

As you are aware, on November 16, 1995 the Air Resources Board (ARB) will consider changing the carbon monoxide (CO) attainment status of the City of Calexico. ARB staff have proposed that the Board designate the City of Calexico as nonattainment for CO based on monitoring data showing violations of the state standard. The purpose of this letter is to let you know our thinking as to what this means in terms of air quality planning requirements.

Air quality designations are made without regard to the influence of transport--they reflect monitored air quality. A nonattainment designation simply indicates that an area is violating an air quality standard. The need for a planning effort is another issue.

Given the potential impact of transport and border activities on air quality in the City of Calexico, we do not believe that planning requirements should be immediately triggered. A better understanding of the nature of the CO air quality problem is needed in order to determine whether a CO planning effort is warranted. Although we propose to designate this region as nonattainment, planning requirements will be deferred until it is clear that a local control program will further progress towards CO attainment in the City of Calexico.

I hope this clarifies our view of the implications of a CO nonattainment designation for the City of Calexico. ARB staff will continue to work closely with the District on this issue. Please feel free to call me at (916) 322-2739 or Mr. Dean Saito, Manager, Liaison Section, at (916) 322-8279 if you have questions.

Sincerely,

Lynn Terry
Assistant Executive Officer

