

**RE: EPA Proposed Partial Approval and Partial Disapproval
Of the PM2.5 State Implementation Plan**

February 2011 Update

Summary:

In November 2010, EPA proposed to partially approve and partially disapprove the fine particulate (PM_{2.5}) air quality plans for the San Joaquin Valley. This plan, known as the State Implementation Plan (SIP), is the roadmap to meeting, by 2015, the 1997 PM_{2.5} National Ambient Air Quality Standards (NAAQS) set by the U.S. EPA to protect public health. The SIP is prepared by the San Joaquin Valley Air Pollution Control District and California's Air Resources Board (ARB)

The Problem:

EPA cannot fully approve the plan because it relies heavily on emissions reductions from several State rules that have not been finalized or submitted to EPA for review

Specifically EPA's review of the SIP found:

- The State of California needs to submit their rules for EPA review
- The air quality modeling is not well explained
- The VOC (volatile organic compound) controls may be effective for reducing PM 2.5 in the Valley
- Contingency measures need improvement

Next Steps:

California's ARB and the San Joaquin Valley Air Pollution Control District are continuing to adopt and submit rules to EPA. These rules will reduce the size of their future commitments and replace them with actual emissions reductions. EPA supports these actions.

In April 2011, the State is required to submit a midcourse review of its PM_{2.5} plans that will evaluate its progress towards meeting the PM_{2.5} standard. This is an opportunity for the State to address EPA's concerns with the current PM_{2.5} SIPs. EPA's hope is that the Mid-Course review will address all their concerns, so that a full approval of the SIP can be issued. EPA anticipates issuing a "re-proposal" in May 2011.

California's ARB and the Valley Air District continue to work together with EPA, and have submitted comment letters on the Proposed Disapproval.

Fresno COG is preparing to amend the 2011 RTP and 2011 FTIP and is performing a Conformity Analysis to protect our ability to deliver projects in a timely fashion.

Worst Case Scenario:

Should EPA proceed to a “Final Disapproval” federally funded plans, projects and programs could be subject to transportation conformity impact, at the earliest, in mid-November 2011.

Updates:

Fresno COG staff will continue to update the committees as new information becomes available.

For More Information :

<http://www.epa.gov/region9/air/actions/ca.html>