

PM2.5 Proposed Disapproval  
Fresno COG Policy Board  
June 30, 2011

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

**June 2011 Update**

**Summary:**

**This is a follow-up to the report provided to the Policy Board in February 2011.**

In November 2010, EPA proposed to partially approve and partially disapprove the fine particulate (PM<sub>2.5</sub>) 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<sub>2.5</sub> 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 (state) 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:**

In response to EPA's action, California's ARB and the San Joaquin Valley Air Pollution Control District have adopted and submitted rules to EPA, along with additional documentation supporting the PM2.5 State Implementation Plan. EPA anticipated issuing a "re-proposal" in May 2011. As of 6/20/2011 no re-proposal has been issued by EPA. The intent of the re-proposal is an opportunity for EPA to fully evaluate the responses that both the local Air District and the California Air Resources Board have provided to EPA.

In order to take a proactive approach, Fresno COG amended the 2011 RTP and 2011 FTIP with a new regional emission analysis completed for the corresponding Conformity Analysis which was adopted in April 2011, and received Federal approval May 24, 2011. All projects that were able to be move forward were incorporated in the amendments.

**Worst Case Scenario:**

Should EPA proceed to issue a "Final Disapproval"- federally funded plans, projects, and programs could be impacted and subject to conformity issues arising from EPA action, at the earliest, in mid-November 2011.

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**Updates:**

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

\*\*\*\*A similar issue with the 8-Hour Ozone Plan is anticipated to be addressed by EPA in July or August 2011.

**For More Information:**

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