

Air Quality Update
Fresno COG Policy Board
July 28, 2011

**RE: EPA Proposed Partial Approval and Partial Disapproval
of the PM_{2.5} State Implementation Plan**

July 2011 Update

This is a follow-up to the report provided to the TTC/PAC and Policy Board in February 2011.

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 could not fully approve the plan because it relied heavily on emissions reductions from several State rules that had not been finalized or submitted to EPA for review.

Summary:

On July 13, 2011, EPA published a second notice in the Federal Register proposing to approve in part and disapprove in part the San Joaquin Valley 2008 PM_{2.5} Plan, including the revisions made in 2010 and 2011. EPA previously identified several inadequacies in the PM Plan; all have been satisfactorily addressed except for the contingency measures.

The California Air Resources Board announced 6/20/2011 that revised transportation conformity emission budgets will be considered for approval at the July 21, 2011 ARB public hearing. The emission budget revisions include those reductions from the Air District's Indirect Source Review (ISR) Rule. (EPA required removing those reductions from the emission budgets).

Fresno COG Response:

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

The eight valley COGs are in the process of reviewing the proposed revised conformity budgets to assess potential impacts to the local conformity process. In addition, we are waiting for the impending release of a new emission factor model (EMFAC 2010) from ARB, and will begin testing the model as soon as it is released.

Possible Scenarios:

EPA must take Final Action on the PM_{2.5} Plan by September 30, 2011.

- If EPA issues final approval of the updated transportation conformity budgets, they will be used in the conformity analysis for the 2013 FTIP (currently anticipated to begin early 2012).

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- If EPA disapproves the updated transportation conformity budgets, a conformity freeze will be imposed mid-November 2011. During a conformity “freeze” only projects in the first 4 years of the most recent TIP and RTP could proceed. Sanctions could be issued 18 months (stationary sources) and 24 months (highway) after the effective date of the final disapproval. No sanctions would be imposed if California submits and EPA approves the SIP revisions that correct the deficiencies.
- EPA is proposing to approve the revisions and are also proposing to issue a “protective finding” to the disapproval of the contingency measures. The “protective finding” will protect the SJV, and not result in a conformity freeze for the Valley. (This finding is related to the contingency measure issue).

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>