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AIR POLLUTION CONTROL DISTRICT

November 20, 2017

Sylvia Vanderspek, Branch Chief
Air Quality Planning Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms Vanderspek,

The Imperial County Air Pollution Control District (Air District) is requesting the exclusion of ambient air quality data measured as an exceedance of the PM_{10} National Ambient Air Quality Standard (NAAQS) on March 30, 2014 and April 1, 2014 at the State and Local Air Monitoring Stations (SLAMS) located in Brawley, California. As required by the Exceptional Events Rule the Air District is submitting to the California Air Resources Board an Exceptional Event (EE) Demonstration that ambient air quality data in Imperial County was affected by high winds on March 30, 2014 and April 1, 2014 causing an exceedance of the PM_{10} NAAQS[1].

The March 30, 2014 and April 1, 2014 EE Demonstration, written under the auspices of the 2007 Exceptional Events Rule, addresses non-technical and required core technical elements.[2] In order to address any requirement changes resulting from the October 3, 2016 revisions to the Exceptional Events Rule the Air District prepared a March 30, 2014 and April 1, 2014 Addendum.[3] The Addendum bridges the original March 30, 2014 and April 1, 2014 EE Demonstration with any new requirements imposed by the revisions to the EE Rule. Essentially, the Addendum explains where in the document the requirements are met or clarifies the applicability of the new requirement and/or provides additional information.

Based on the interim guidance and the final guidance issued October 3, 2016, the analysis indicates that a natural event occurred on March 30, 2014 and April 1, 2014 when two strong low pressure systems that moved through southern California. The first system moved in during the late evening on March 29, 2014, and continued through March 30, 2014. A second system moved in during the afternoon on March 31, 2014 and continued through the region on April 1, 2014. Both systems brought strong and gusty westerly winds, 25 to 35 mph, across the mountains and deserts of southeastern California.

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[1] "Treatment of Data Influenced by Exceptional Events: Final Rule", 72 FR 13560, March 22, 2007
[2] Interim Guidance on the Preparation of Demonstrations in Support of Requests to Exclude Ambient Air Quality Data Affected by High Winds Under the Exceptional Events Rule, United States Environmental Protection Agency, May 2013
[3] "Final rule: notification to states with areas subject to mitigation requirements; final guidance", 81 FR 68216, October 3, 2016

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Dust particles from largely barren desert soils to the west were entertained by these winds impacting all monitors in Imperial County on March 30, 2014 and April 1, 2014. However, only the Brawley monitor exceeded the NAAQS for PM_{10}.

As a result, the National Weather Service (NWS) issued an urgent weather massage containing a wind advisory for Imperial county on April 1, 2014 indicating strong gusty, up to 40 mph, winds would impact areas located within the western section of Imperial County.

The Air District respectfully requests that after your review, you forward copies of the final documentation to the US EPA, Region IX office showing that a natural event did occur which caused an exceedance of the PM_{10} NAAQS.

In addition to the core required technical elements the Air District fulfilled nontechnical requirements; public notification that a potential event was occurring; notification to the US EPA of the intent to exclude the measured exceedance and documentation that the public comment process was followed.

On January 4, 2017 the Air District published in the local newspaper of greatest circulation a "Notice of Availability of the demonstration of the occurrence of an Exceptional Event" providing notice to the public that the Air District is requesting the exclusion of PM_{10} monitored data affected by a natural event on March 30, 2014 and April, 2014. The comment period ended on February 3, 2017 allowing the public to submit comments for a 30 day period. In addition, the technical demonstration was made available on the Air Districts website from January 4, 2017 thru February 3, 2017. No public comments were received.

As always, should you have any questions or require any further information, please contact the undersigned at (442) 265-1800

Sincerely,

Matt Dessert
Air Pollution Control Officer

CC: Michael Flagg, US EPA (electronic only)