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AIR POLLUTION CONTROL DISTRICT

November 9, 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 May 7, 2015 at the State and Local Air Monitoring Stations (SLAMS) located in Niland, 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 May 7, 2015 causing an exceedance of the PM_{10} NAAQS[1].

The May 7, 2015 EE Demonstration, written under the auspices of the 2016 revision to the Exceptional Events Rule, addresses non-technical and required core technical elements.[2]

Based on the interim guidance and the final guidance issued October 3, 2016, the analysis indicates that a natural event occurred on May 7, 2015 when strong westerly winds associated with the passage of a Pacific weather disturbance which was enhanced by the presence of a strong upper level trough moving through southern California and into Imperial county. The regional weather system brought strong westerly winds, up to 30 mph with strong gusts 40 to 45 mph, across the mountains and deserts. Dust particles from largely barren desert soils to the west were entrained by these winds impacting the Niland monitor on May 7, 2015.

As a result, the National Weather Service (NWS) issued, as early as May 5, 2015, an Urgent Weather Message which included a wind advisory for the San Diego deserts effective from May 6, 2015 to May 8, 2015. The urgent Weather message forecasted winds west southwest 25 to 30 with gusts 40 to 45 mph. In addition, the NWS Phoenix office issued an Urgent Weather message that included a wind advisory for May 7, 2015.

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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

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

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 September 29, 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 May 7, 2015. The comment period ended on November 1, 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 September 29, 2017 thru November 1, 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)