Message

From: Stauffer, Panah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50083CE00E384879B4E4E066B0923C22-BHALLA, PANAH]
Sent: 8/29/2019 8:44:57 PM
To: Xu, Jin@ARB [jin.xu@arb.ca.gov]; Kwong, Jenette@ARB [jenette.kwong@arb.ca.gov]; Densberger, Matthew@ARB [Matthew.Densberger@arb.ca.gov]
CC: Smith, Noah [SMITH.NOAH@EPA.GOV]
Subject: FW: EEP requirement

Hi Jin, Jenette, and Matthew,

I had a few conversations with Gary in SLO this week. I'd like to chat with you about that, if possible. I'm in today and tomorrow, but this can also wait since they are aiming for their November board meeting. Gary sent me the note below saying he's making some revisions to the plan, so we could also wait for that.

I think the Amador plan will be a helpful example for SLO, and the Bay Area plan (https://ww3.arb.ca.gov/drdb/ba/curhtml/reg-4.pdf) may be, too.

I mentioned to Gary that the Amador plan (and others) list the top 5 VOC and NOX sources and provide an emissions inventory by sector. The latest version of the SLO plan lists the 3 largest NOX sources. Gary told me verbally about the NOX breakdown by source category. I told him that would be helpful to include in the plan, so that might be a revision he's referring to.

Some questions have come up about the largest NOX source, which is a refinery. I noticed that the same company has a refinery in the Bay Area. The Bay Area plan requires facilities over 100 tons/yr to have industrial abatement plans and also has provisions for curtailing operations at facilities outside of that category starting at the Warning level.
40 CFR Part 51 Appendix L also addresses refineries with language about curtailing operations, noting that they can take a long time to shut down.

I mentioned to Gary that inspection is one of the required elements of any emergency episode plan, but I think we might need to talk about that further.

I can give you a call today or tomorrow, or we can talk next week.

Thanks a lot,
Panah

Panah Stauffer
Air Division (AIR-2)
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3247

From: Gary Arcemont <garcemont@co.slo.ca.us>
Sent: Thursday, August 29, 2019 10:53 AM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Subject: EEP requirement

Hi Panah-

Thank you for talking with me about the EEP requirement.

I am currently updating the current plan to address some of the issues that we talked about. I will send you a copy of the revised version, so you can provide feedback.

Thanks again.

Gary Arcemont
Air Quality Specialist
Planning, Outreach and Grants Division
San Luis Obispo County Air Pollution Control District
3433 Roberto Court, San Luis Obispo, CA 93401
(805) 781 5998 garcemont@co.slo.ca.us

From: Stauffer, Panah <Stauffer.Panah@epa.gov>
Sent: Friday, August 9, 2019 11:02 AM
To: Gary Arcemont <garcemont@co.slo.ca.us>
Cc: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>; Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: RE: [EXT]FW: EEP requirement

Hi Gary,

It was great to speak with you just now. Thanks so much for talking through your process with me.

As an example, here is the language that has been used in other plans regarding inspections. It has been included in the list of actions for the applicable Alert/Warning/Emergency levels. You can modify this language to make it more relevant to SLO's plan, such as by replacing "targeted facilities" with a reference to Table 3, or whatever makes sense.

> "f) Conduct on-site inspection of targeted facilities to ascertain accomplishment of applicable emission control actions;"

Thanks for explaining to me that Table 3 lists the highest NOX-emitting facilities and that SLO is a NOX-limited area. And thanks in advance for looking into the control actions listed in Appendix L and how the actions listed in the plan can be more specific.

As we discussed, revising the plan might mean it has to be re-published for public notice, which probably means the plan will be reviewed at the November board meeting. That should be fine.

I will be in next week if you want to talk about anything.

Thanks again,
Panah

Panah Stauffer
Air Division (AIR-2)
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3247

From: Gary Arcemont <garcemont@co.slo.ca.us>
Sent: Friday, August 09, 2019 9:07 AM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Cc: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>; Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: RE: [EXT]FW: EEP requirement

Good morning Panah,

Thank you for your email.

Would it be possible to talk today? If so, please let me know what time would work for you and what number to call.

Thank you!

Gary Arcemont
Air Quality Specialist
Planning, Outreach and Grants Division
San Luis Obispo County Air Pollution Control District
3433 Roberto Court, San Luis Obispo, CA 93401
(805) 781 5998 garcemont@co.slo.ca.us

From: Stauffer, Panah <Stauffer.Panah@epa.gov>
Sent: Thursday, August 8, 2019 4:28 PM
To: Gary Arcemont <garcemont@co.slo.ca.us>
Cc: Xu, Jin@ARB <jin.xu@arb.ca.gov>; Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>; Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: RE: [EXT]FW: EEP requirement

Hi Gary,

My name is Panah and I work on the EPA Region 9 air planning team. It's nice to meet you by email. Thanks very much for your work on the SLOAPCD ozone emergency episode plan.

I have a few questions about the updated version of the plan that is online:

- One of the comments we had on the previous version was about the requirement in 40 CFR 51.152(b)(2) for inspection of sources. Are you planning to include that language in the new version?
- The three sources that are listed from the CARB online mapping tool on p.5- are they the three largest stationary sources in the district?
- One of those three sources is a refinery and the other is an oil and gas development facility. Those seem related to the sources that are listed in 40 CFR Part 51, Appendix L. (That's EPA's template for emergency episode plans.) Are there specific control actions for those facilities (like the ones in Appendix L) that you are planning to include in the new version of the plan?

I'm happy to discuss these questions further with you. I know that Jin is out next week, so we can schedule a phone call for the week of August 19th if you're available. Please feel free to call me at the number below as well.

Thanks very much again,

Panah Stauffer
Air Division (AIR-2)

US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3247

From: Xu, Jin@ARB <jin.xu@arb.ca.gov>
Sent: Friday, August 02, 2019 1:46 PM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>; Smith, Noah <SMITH.NOAH@EPA.GOV>; Mays, Rory <Mays.Rory@epa.gov>
Subject: FW: [EXT]FW: EEP requirement

FYI - The SLO EEP is now posted for public comments. Thanks very much for all your help.

Jin

Jin Xu
Manager, Air Quality Analysis Section
Air Quality Planning and Science Division
California Air Resources Board
jin.xu@arb.ca.gov
(916) 327-1511

From: Gary Arcemont <garcemont@co.slo.ca.us>
Sent: Friday, August 2, 2019 1:39 PM
To: Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>
Cc: Xu, Jin@ARB <jin.xu@arb.ca.gov>
Subject: RE: [EXT]FW: EEP requirement

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The Plan was posted today- it is located:

https://www.slocleanair.org/rules-regulations/clean-air-plan.php

https://www.slocleanair.org/article-details.php?id=48

I will post to social media too

Gary Arcemont
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Planning, Outreach and Grants Division
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3433 Roberto Court, San Luis Obispo, CA 93401
(805) 781 5998 garcemont@co.slo.ca.us

From: Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>
Sent: Wednesday, July 31, 2019 11:17 AM

To: Gary Arcemont <garcemont@co.slo.ca.us>
Cc: Xu, Jin@ARB <jin.xu@arb.ca.gov>
Subject: RE: [EXT]FW: EEP requirement

Hi Gary,

Were you able to make the edits to address EPA Region 9 comments? Can you please send us a copy of the district final document or a link to the web posting?

I am going in for hand surgery tomorrow and I not sur how long I will be out. Can you please include my manager Jin on future emails.

Jin Xu
Manager, Air Quality Analysis Section
Air Quality Planning and Science Division
California Air Resources Board
jin.xu@arb.ca.gov
(916) 327-1511

Thank you,
Jenette Kwong
916-324-9460

From: Gary Arcemont <garcemont@co.slo.ca.us>
Sent: Friday, July 26, 2019 9:27 AM
To: Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>
Subject: RE: [EXT]FW: EEP requirement

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Thanks!

I already made that change – but it is good to have that confirmation – I am currently working on edits that address EPAs comments – I hope the edits address EPAs concerns.

Thanks and have a good weekend

Gary Arcemont

From: Kwong, Jenette@ARB <jenette.kwong@arb.ca.gov>
Sent: Friday, July 26, 2019 9:24 AM
To: Gary Arcemont <garcemont@co.slo.ca.us>
Subject: [EXT]FW: EEP requirement

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Hi Gary, I overlooked sending this to you Friday. If you haven't posted yet, it is just a change in language. Page 3

Jenette Kwong
916-324-9460

Sent: Friday, July 19, 2019 2:37 PM
Subject: EEP requirement

As we discussed with EPA, an attainment area by default is not considered exempt from the EEP requirements. So, for this sentence "Under the Code of Federal Regulations (CFR), areas that (1) do not attain the federal standards for ozone, and (2) have hourly ozone concentrations above 0.10 parts per million (ppm), are required to develop a contingency plan …",

Suggest to change it to "Under the Code of Federal Regulations (CFR), areas that have hourly ozone concentrations above 0.10 parts per million (ppm) are classified as Priority I Regions and required to develop a contingency plan …".

Please let me know if you have any comments/suggestions.