South Coast
Air Quality Management District
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Office of the Executive Officer
Wayne Nastri
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April 24, 2019

Richard Corey
Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Clarification of Commitment by the South Coast Air Quality Management District (South Coast AQMD) to Adopt New Rules or Revisions to Rules as Contingency Measures for the 2006 24-hour and 2012 Annual PM2.5 Standards

Dear Mr. Corey,

In response to a recent request from the U.S Environmental Protection Agency (U.S. EPA)~~,~~ to provide additional specificity for contingency measures, the South Coast AQMD is ~~providing further clarification to the~~revising its commitment letter ~~(~~dated January 29, 2019~~)~~, which identifies rules that could be adopted or amended to include contingency measures, as required in Clean Air Act Section 172(c)(9), if the South Coast Air Basin fails to attain the 2006 24-hour or 2012 annual PM2.5 standard; to meet any reasonable further progress (RFP) requirement; to meet any quantitative milestone; or to submit any required quantitative milestone report, pursuant to the U.S. EPA determinations listed in 40 CFR 51.1014(a).

To address U.S. EPA's request, South Coast AQMD commits to modify an existing rule or adopt a new rule to include a more stringent requirement, or removal or limitation of an exemption, that would ~~include a *specific* contingency measure for failure to meet~~become effective if the U.S. EPA makes any of the ~~U.S. EPA~~ determinations listed in 40 CFR 51.1014(a), pending South Coast AQMD Governing Board approval~~.~~ Specifically, South Coast AQMD commits to include such a contingency measure in one or ~~more~~both of the following rule(s~~) with additional details on potential contingency provisions~~):

- Amend Rule 445 - *Wood Burning Devices* to require a mandatory winter burning curtailment in the *county* where a specific source/receptor area is forecast to exceed 30 µg/m3; and/or require a mandatory winter burning curtailment in the entire South Coast Air Basin where *any* specific source/receptor area is forecast to

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exceed 30 µg/m3; and/or lower the PM concentration threshold from 30 µg/m3 to 25 µg/m3;

- Amend Rule 1138 - *Control of Emissions from Restaurant Operations* to remove a proposed exemption for any facility that would otherwise not be required to install a PM control device.

~~As noted in the January 29, 2019 commitment letter,~~The South Coast AQMD ~~will amend~~commits to adopt the rule and~~/or rule amendment and to~~ transmit the adopted/amended rule(s) to the California Air Resources Board (CARB) ~~to allow~~in time for CARB to submit ~~it~~the new or revised rule to U.S. EPA ~~within 12 months~~by the earliest of the following dates:

1) One year after the date of the U.S. EPA's ~~final action on attainment and/or RFP~~ conditional approval of the contingency measures for the ~~2006 24-hour PM2.5 standard or the~~ 2012 annual PM2.5 standard~~, whichever occurs first~~; or

2) ~~This letter is to~~60 days after the date the U.S. EPA determines that the South Coast area has failed to attain the 2006 24-hour PM2.5 standards, if U.S. EPA makes such a finding, but no later than one year after the date of the U.S. EPA's conditional approval of the contingency measures for these standards.

~~This letter is to~~ We request that CARB forward this ~~clarification of the~~ revised commitment to U.S. EPA for their consideration in their proposed actions on the 2016 AQMP's attainment ~~and RFP~~ contingency measures for the serious area plan for the 2006 24-hour PM2.5 standard~~,~~ and RFP contingency measures for the moderate area plan for the 2012 annual PM2.5 standard~~, and the serious area plan for the 2012 annual PM2.5 standard in the 2016 AQMP~~. If you have any questions or would like to discuss these issues, please contact me at 909-396-3131, [HYPERLINK "mailto:wnastri@aqmd.gov"], Dr. Philip Fine, Deputy Executive Officer, Planning, Rule Development and Area Sources, at 909-396-2239, [HYPERLINK "file:///C:\\Users\\kcheung\\Documents\\AQMP\\implementationplan\\2015%20ozone\\pfine@aqmd.gov"], or Megan Lorenz, Principal Deputy District Counsel, at 909-396-3463, [HYPERLINK "mailto:mlorenz@aqmd.gov"].

Sincerely,

Wayne Nastri
Executive Officer

cc (email): Mike Stoker, U.S. EPA, Region IX
Elizabeth Adams, U.S. EPA, Region IX
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