



Terry Tamminen  
Agency Secretary

# Air Resources Board

Alan C. Lloyd, Ph.D.  
Chairman

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AQTPB Chron



Arnold Schwarzenegger  
Governor

February 27, 2004

Mr. Wayne Nasti  
Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Dear Mr. Nasti:

The Air Resources Board (ARB) hereby submits to the U.S. Environmental Protection Agency (U.S. EPA) the 2003 Revision to the Owens Valley Plan to attain federal standards for particulate matter 10 microns and smaller (PM10) as a revision to the California State Implementation Plan (SIP). We request that U.S. EPA act expeditiously to find the 2003 Revision complete, and fully approve it as an enforceable framework for actions taken to protect the health of the people living in the Owens Valley.

The Great Basin Unified Air Pollution Control District (District) adopted the 2003 Revision to the Owens Valley PM10 Plan on November 13, 2003. It fulfills a commitment made in the 1998 Owens Valley SIP by providing air quality modeling which demonstrates that the revised control strategy will bring the area into attainment with the National Ambient Air Quality Standards for particulate matter by December 31, 2006.

The 1998 SIP required the Los Angeles Department of Water and Power (LADWP) to control a total of 16.5 square miles of dry lakebed by December 31, 2003. The 2003 Revision documents that the LADWP has met this milestone. The 1998 SIP required LADWP to control an additional six square miles by 2006. In contrast, the 2003 Revision requires the control of an additional 13.3 square miles by December 31, 2006, and provides for the imposition of supplemental controls if needed.

As you know, the PM10 problem in the Owens Valley is unique and complex, and the 2003 Revision represents a consensus approach to addressing PM10 emissions for this area. The proposed level of control of a dry lakebed such as Owens Lake has never been demonstrated on such a scale. Specifically, the control strategy relies on shallow flooding, managed vegetation, and gravel cover to mitigate

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California Environmental Protection Agency

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the primary source of PM10 emissions – wind blown dust from the exposed playa at Owens Lake. The 2003 Revision also incorporates a District Board Order to the City of Los Angeles to implement the 2003 Revision control measures according to mandatory implementation milestones. These milestones will be used to demonstrate reasonable further progress as required by the federal Clean Air Act.

This transmittal package consists of the following three enclosures:

- Enclosure 1. December 10, 2003 letter from Dr. Ellen Hardebeck, Air Pollution Control Officer for the District, to Ms. Catherine Witherspoon, ARB Executive Officer, transmitting the 2003 Revision to the Owens Valley PM10 SIP, with technical appendices.
- Enclosure 2. SIP Completeness Checklist, identifying where key SIP requirements, such as the District Resolution of Adoption, are located in the Plan.
- Enclosure 3. ARB Executive Order G-125-316 adopting the 2003 Revision as a revision to the SIP.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Sylvia Oey, Manager, Southern California Liaison Section, at (916) 322-8279.

Sincerely,

  
Catherine Witherspoon  
Executive Officer

Enclosures

cc: See next page.

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cc: Mr. Gerald Gewe (without Enclosures)  
Chief Operating Officer  
Los Angeles Department of Water & Power  
111 N. Hope Street, Room 1455  
Los Angeles California 90051

Mr. Richard Harasick, Director (without Enclosures)  
Owens Lake Dust Mitigation Program  
Los Angeles Department of Water & Power  
111 N. Hope Street, Room 1460  
Los Angeles, California 90012

Dr. Ellen Hardebeck (with Enclosures 2 and 3)  
Air Pollution Control Officer  
Great Basin Unified Air Pollution  
Control District  
157 Short Street  
Bishop, California 93514-3537

Ms. Deborah Jordan, Director (without Enclosures)  
Air Division, Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Ms. Lynn Terry (with Enclosure 3)  
Air Resources Board

Ms. Sylvia Oey (with Enclosure 3)  
Air Resources Board

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bcc: (via email, Letter only)

Bob Jenne, Legal  
John DaMassa, PTSD  
Robert Effa, PTSD  
Cynthia Marvin, PTSD  
Vernon Hughes, PTSD  
Tony Servin, PTSD

(via hard copy)

Lucille van Ommering, PTSD  
SIP Library (With All Enclosures)  
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External bcc: (via email, Letter only)

Mr. Larry Biland, U.S. EPA – Region 9  
Mr. John Kennedy, U.S. EPA – Region 9  
Mr. Duane Ono, Great Basin District