Antelope Valley Air Quality Management District
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April 18, 2017

Richard Corey, Executive Officer
State of California EPA
California Air Resources Board
PO Box 2815
Sacramento, CA 95812

Project Title: Adoption of *AVAQMD Federal 75 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)*

Dear Mr. Corey:

The Antelope Valley Air Quality Management District (AVAQMD) requests that the California Air Resources Board submit *AVAQMD Federal 75 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)*, to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The Governing Board of the Antelope Valley Air Quality Management District (AVAQMD) adopted the *AVAQMD Federal 75 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Plan)* on March 21, 2017. The *AVAQMD Federal 75 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)* was adopted to satisfy Federal Clean Air Act (FCAA) requirements that the AVAQMD develop a plan to attain the 0.075 part per million (ppm) 8-hour ozone National Ambient Air Quality Standard (NAAQS). This plan will update the 2008 *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*. Portions of previously adopted and approved plans will remain in effect until the region has been designated attainment for the relevant prior standard.

Enclosed are various documents associated with this action. The enclosures are:

- *AVAQMD Federal 75 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)*
- Certified Adoption Minute Item
- Certified Resolution 17-05
- Final Staff Report
- Proof of Publication – Los Angeles County (Final Staff Report Appendix "B")
- Notice of Exemption – Los Angeles County (Final Staff Report Appendix "D")

In addition to the official adoption items, the District is also providing Addendum A, an Emission Statement Certification; and Addendum B, a demonstration that control of Reasonably Available Control Technology (RACT) sources will not advance the attainment date of this plan.

Please feel free to contact me if you need any further information.

Sincerely,

Alan J. De Salvio
Deputy Director, Mojave Desert Operations

AJD/tw

Addendum A & B

Cc: Monica Lewis
Sylvia Vanderspek

Addendum A

Emission Statement Certification

Federal Clean Air Act (FCAA) §182(a)(3)(B) requires ozone nonattainment areas to mandate submittal of emission statement data from certain sources of VOC or NOx. The FCAA stipulates the following emission statement requirements be met:

FCAA Requirements	District Response
"Within two years after November 15, 1990, the state (or District) is required to submit a revision to the State Implementation Plan requiring stationary sources of NO_X or VOC to provide the agency with a statement, in such form as the Administrator may prescribe (or accept an equivalent alternative developed by the state), for classes or categories of sources, showing the actual emissions of NO_X or VOC from that source." (FCAA §182(a)(3)(B)(i))	Rule 107 adopted May 15, 2012; Rule 107 promulgated into SIP on April 11, 2013 (78 FR 21545).
"Submittal of the first statement was required to be submitted within three (3) years after November 15, 1990. Submittal of subsequent statements is required at least every year thereafter." (FCAA §182(a)(3)(B)(i))	The District reports emission data electronically to the USEPA through the ARB on an annual basis. Data has been submitted annually.
"Statements shall contain a certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement." (FCAA §182(a)(3)(B)(i))	Each statement contains a certification that the information contained in the statement is accurate to the best knowledge of the completer.
"The state (or District) may elect to waive the application of clause (i) to any class or category of stationary sources which emit less than 25 tons per year of VOC or NO_X if the state provides an inventory of emissions from such class or category of source, based on the use of the emission factors established by the Administrator or other methods acceptable to the Administrator." (FCAA §182(a)(3)(B)(ii))	N/A

The 2008 eight-hour ozone standard implementation rule acknowledges that if an area has a previously approved emission statement rule in force for the former 1997 eight-hour or 1979 one- hour ozone NAAQS, the existing rule is likely sufficient for meeting the emission statement requirement for the 2008 eight-hour ozone NAAQS. The District adopted Rule 107 – Certification and Emission Statements on May 15, 2012 to cover the entire AVAQMD. Additionally, the implementation rule recommends that air districts review the existing rule to ensure adequacy in the form of a written statement to the USEPA.

The District reviewed Rule 107 for adequacy, pursuant to the FCAA requirements and subsequent USEPA guidance and associated memoranda. The rationale is specified in the table above. Consequently, the District determines that existing Rule 107 meets all FCAA requirements set forth in the implementation rule. The District certifies that Rule 107, as promulgated into the SIP on April 11, 2013 (78 FR 21545), remains adequate for the purposes of implementing the 2008 eight-hour ozone NAAQS.

Addendum B

Transportation Control Measures
Reasonably Available Control Measure Assessment

The Federal Clean Air Act (FCAA) Section 172(c)(1) requires ozone nonattainment areas to complete a review of control measures in the State Implementation Plan. These control measures must be shown to be Reasonably Available Control Measures (RACM). CARB is responsible for measures to reduce emissions from mobile source programs needed to attain the National Ambient Air Quality Standards (NAAQS), including Transportation Control Measures (TCM). For TCMs to be RACM, TCMs must be both technologically and economically feasible and must advance the projected attainment date of the National Ambient Air Quality Standard (NAAQS) by one year. Given the severity of California's air quality challenges, CARB has implemented the most stringent mobile source emissions control program in the nation. CARB's comprehensive strategy to reduce emissions from mobile sources includes stringent emissions standards for new vehicles, in-use programs to reduce emissions from existing vehicle and equipment fleets, cleaner fuels that minimize emissions, and incentive programs to accelerate the penetration of the cleanest vehicles beyond that achieved by regulations alone. Taken together, California's mobile program meets RACM requirements in the context of ozone nonattainment.

The AVAQMD adopted the 8-*Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* on July 21, 2015. The District has examined existing control measures and has determined that controls from Reasonably Available Control Technology and mobile source emission control programs (RACM Analysis) will not advance the attainment year of the plan. The AVAQMD is downwind of the Los Angeles basin, and to a lesser extent, is downwind of the San Joaquin Valley. Prevailing winds transport ozone and ozone precursors from both regions into and through the Mojave Desert Air Basin (MDAB) during the summer ozone season. These transport couplings have been officially recognized by CARB[1]. Local AVAQMD emissions contribute to exceedances of both the national and state ambient air quality standards for ozone, but photochemical ozone modeling conducted by the South Coast Air Quality Management District (SCAQMD) and CARB indicates that the MDAB would be in attainment of both standards without the influence of this transported air pollution from upwind regions.

[1] Ozone Transport: 2001 Review," April 2001, CARB identifies the South Coast Air Basin as having an overwhelming and significant impact on the MDAB (which includes the Mojave Desert) and the San Joaquin Valley as having an overwhelming impact on the MDAB.