Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
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Winston H. Hickox
Agency Secretary

Gray Davis
Governor

August 19, 2003

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

Dear Mr. Nastri:

The Air Resources Board (ARB) submits to the U.S. Environmental Protection Agency (U.S. EPA) the *2003 San Joaquin Valley Plan to Attain Federal Standards for Particulate Matter 10 Microns and Smaller* (2003 PM10 Plan) as a revision to the California State Implementation Plan (SIP). We request that U.S. EPA act expeditiously to: (1) find the 2003 PM10 Plan complete and avert upcoming sanctions and (2) fully approve it as an enforceable framework for actions to protect the health of more than three million people living in the San Joaquin Valley.

We are also submitting new State commitments for measures and emission reductions as contained in Section I.D.2 of the *Proposed 2003 State and Federal Strategy for the California State Implementation Plan*, as revised by ARB Resolution 03-14. Under this commitment, ARB will develop four new measures for passenger vehicles, trucks, and off-road equipment, and the Bureau of Automotive Repair will implement its remaining Enhanced Inspection and Maintenance (I/M) improvements. The I/M measure replaces prior State SIP commitments for the California Enhanced I/M program with the combined benefits of the existing program and the identified improvements.

Background. The San Joaquin Valley Unified Air Pollution Control District (District) adopted the 2003 PM10 Plan on June 19, 2003. The Board approved the State commitments and the 2003 PM10 Plan following a public hearing on June 26, 2003. The 2003 PM10 Plan includes 245 tons per day of reductions in direct PM10 and PM10 precursor emissions between 1999 and 2010 from a combination of the existing control programs and new commitments. The 2003 PM10 Plan addresses all outstanding federal requirements. Specifically, it demonstrates attainment by the earliest practicable date, applies Best Available Control Measures to all significant sources of PM10 and oxides of nitrogen (NOx), identifies interim progress targets to reduce emissions at least five percent per year, sets emissions budgets for the transportation sector, and provides contingency measures.

Plan Update in 2006. In addition to strengthening the SIP with more control measures, the 2003 PM10 Plan relies on preliminary information available from the California Regional Particulate Matter Air Quality Study. This includes extensive monitoring data, improved inventories for directly emitted PM10 and ammonia, and air quality modeling. The District has committed to reassess the attainment demonstration and update the Plan by March 31, 2006, based on the final Study results. If this reassessment shows a need for control strategy changes, the Plan revision will include the appropriate measures. We believe this commitment, together with annual reports on Plan implementation to the District Board, will help keep the attainment strategy on track.

Transportation Conformity Budgets. The 2003 PM10 Plan includes on-road motor vehicle emission budgets for the years 2005, 2008, and 2010. Concurrent with the budget adequacy finding due in 90 days, we ask U.S. EPA to approve the immediate use of the proposed conformity mechanism to mitigate post-2010 increases in road dust with additional NOx reductions from adopted motor vehicle controls. The attainment demonstration establishes the ratio of NOx reductions that decrease the mass of fine particles equivalent to the increase in mass of coarse dust particles. The conformity regulation allows pollutant substitution in conformity determinations based on the framework established in a submitted SIP revision. We believe this approach is legally and scientifically sound, as well as appropriate from a public health perspective.

To ensure that any future updates to these budgets are used expeditiously in the conformity process, we also request that U.S. EPA allow budgets to be replaced upon a finding of adequacy. To accomplish this, we ask U.S. EPA to limit its approval of the budgets submitted today to last only until the effective date of future U.S. EPA adequacy findings for replacement budgets.

Enclosures. This package consists of five copies of the following materials.

I) June 25, 2003, letter from Mr. Dave Jones, Director of Planning for the District, to Ms. Catherine Witherspoon, ARB Executive Officer, transmitting:

- A) 2003 PM10 Plan,
- B) SIP Completeness Checklist,
- C) Public Notice Evidence,
- D) Resolution adopting the 2003 PM10 Plan from the District Governing Board (Resolution 03-06-07),
- E) Public Comments and Responses,
- F) Board Report,
- G) California Environmental Quality Act Documentation,
- H) Additional Comments and Responses received just prior to and during the Governing Board Hearing, and
- I) Additional Technical Documentation Supporting Precursor Atmospheric Chemistry.

II) Public notice evidence and transcript for the ARB Public Meeting to Consider Approval of the Proposed 2003 State Implementation Plan for Particulate Matter in the San Joaquin Valley, including New State Strategies to Reduce Emissions.

III) ARB Executive Order G-125-304 adopting the State commitments as a revision to the SIP, including ARB Resolution 03-14 and responses to environmental issues raised during the public comment period.

IV) ARB Executive Order G-125-305 adopting the 2003 PM10 Plan as a revision to the SIP, including ARB Resolution 03-15.

V) ARB *Staff Report on Proposed 2003 State Implementation Plan for Particulate Matter in the San Joaquin Valley.*

VI) *Proposed 2003 State and Federal Strategy for the California State Implementation Plan.*

VII) Written comments received by ARB on the new State strategies.

VIII) Written comments received by ARB on the 2003 PM10 Plan.

IX) Transportation conformity budget documentation.

To aid U.S. EPA's evaluation of the 2003 PM10 Plan, ARB is committed to work with U.S. EPA staff and to provide any additional clarifying information you may need. To ensure steady progress on SIP implementation, we will also work closely with the U.S. EPA and District staff to ensure timely rule submittal.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Cynthia Marvin, Chief, Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

Catherine Witherspoon
Executive Officer

Enclosures

cc: See next page.

cc: Mr. Jack Broadbent, Director (With Enclosures III and IV)
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Ms. Cynthia Marvin (With Enclosures III and IV)