



May 5, 2014

Jared Blumenfeld
Regional Administrator
US EPA Region 9
75 Hawthorne Street
Mail Code: ORA-1
San Francisco, CA 94105

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

RE: Request for EPA Finding that the San Joaquin Valley has Attained the Federal 1-hour Ozone Standard

Dear Mr. Blumenfeld and Mr. Corey:

The San Joaquin Valley Air District (District) formally requests that the U.S. Environmental Protection Agency determine that the San Joaquin Valley (Valley) has attained the federal 1-hour ozone standard. Per federal requirements, the attached submittal includes a clean data finding and a finding that attainment is due to permanent and enforceable emissions reductions. As part of the clean data finding, the District requests EPA concurrence that an exceedance at Fresno-Drummond on August 10, 2012 was due to an exceptional event, as documented in the attached submittal. Alternatively, this submittal also includes compelling evidence that the Valley would attain the 1-hour ozone standard but for the influence of international air pollutant transport, allowing nonattainment penalties to be lifted under CAA 179B.

For the first time in recorded history, in 2013, the Valley had zero violations of the 1-hour ozone standard established by EPA under the federal Clean Air Act. The Valley now meets the 1-hour ozone standard based on the most recent three year period air monitoring data (2011-2013).

The 1-hour ozone standard has been the key focus of the Valley's air quality management strategies for more than two decades. Since 1992, the District has developed and implemented numerous attainment plans and has adopted over 500 of the most stringent rules in the nation to obtain the significant emissions reductions

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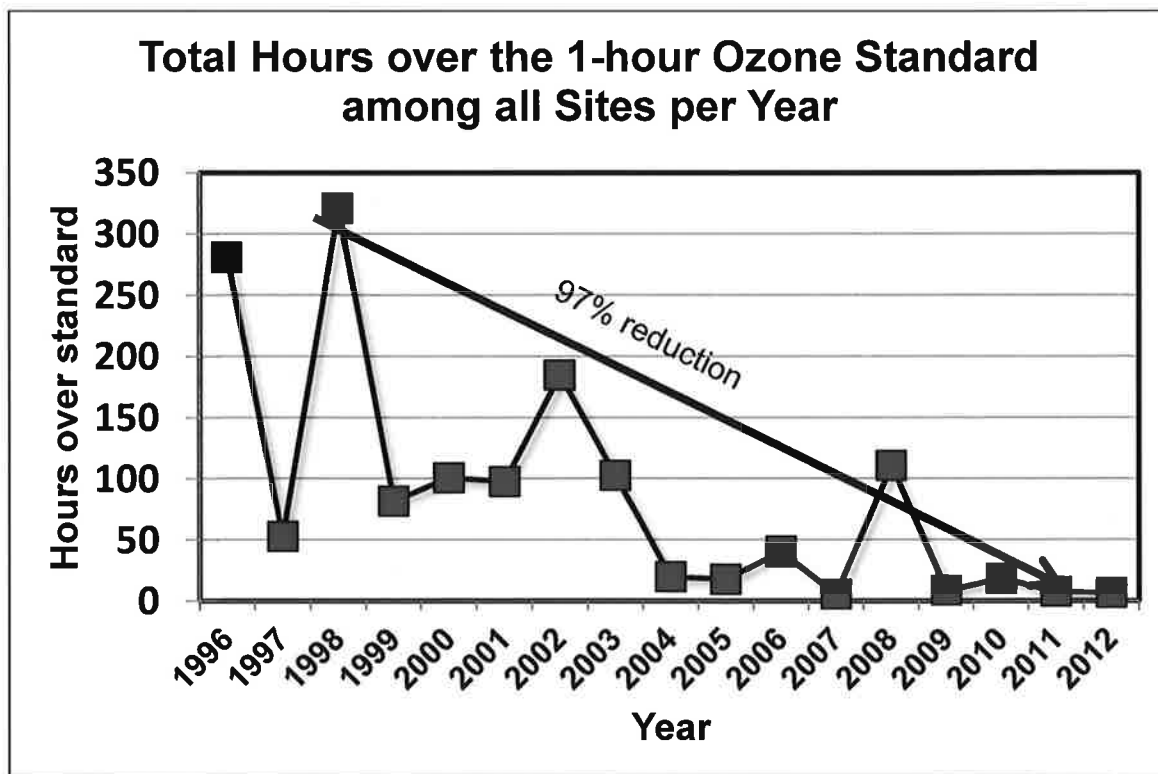
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needed to demonstrate attainment. Additionally, the District has supplemented its regulatory programs with a robust voluntary incentive program that has invested over \$1 billion in clean air projects, resulting in over 100,000 tons of emission reductions. The Valley will be the first and only region in the nation to attain a standard after being classified as “extreme” nonattainment by EPA. The District wishes to express our gratitude to EPA, the California Air Resources Board, and other stakeholders in helping Valley residents reach this tremendous milestone.

This historic accomplishment reaffirms the effectiveness of the investment and commitment by Valley businesses and residents to reduce emissions and improve public health. Emissions from stationary sources have been reduced by over 80%, and the number of ozone violations in the Valley has consistently dropped over the years. Despite strings of triple-digit temperatures and wildfires, 2013 was the cleanest year on record for ozone:

- Zero hours over the 1-hour standard
- Lowest 8-hour design value
- Lowest number of 8-hour exceedances



The attached *Attainment Determination Request* supports both a clean data finding and a finding that attainment is due to permanent and enforceable emissions reductions:

Clean Data Finding:

- **Monitoring data:** Air monitoring data from the relevant three-year period (2011-2013) meets the 1-hour ozone standard via the “expected exceedance days” test.
- **Monitoring network:** As regularly documented in annual monitoring network plans, the Valley’s ozone monitoring network meets monitoring requirements.
- **Saturation study confirms monitoring approach:** A recent saturation study in Arvin shows that the current monitoring site location is appropriate.
- **Exceptional Event:** A 1-hour ozone exceedance at Fresno-Drummond on August 10, 2012 would not have occurred but for an exceptional event of emissions transported from both structural fires and wild fires. As such, this date should be flagged as an exceptional event and not count towards attainment.
- **CAA 179B Transboundary Ozone Demonstration:** Analysis (distinct and separate from the aforementioned exceptional event analysis) also shows that the August 10, 2012 exceedance would not have occurred but for transboundary ozone, or “transported anthropogenic background” ozone. Therefore, even if EPA were to not concur with the August 2012 exceptional event and the clean data finding, 1-hour ozone nonattainment penalties should be discontinued per CAA Section 179B.

Permanent and enforceable emissions reductions:

- **Regulations and emissions reductions:** The District and ARB have adopted the nation’s most stringent regulations, and these regulations achieve significant ozone precursor emissions reductions.
- **No unusually favorable meteorology:** Meteorological analysis shows that 2011-2013 ozone season meteorology was neither unusual nor the cause of attainment.
- **No decrease in economic activity:** Analyses of vehicle miles traveled and state fuel sales as indicators of economic activity shows that there wasn’t a decrease in economic activity that is responsible for attainment.

Of course, as you know, despite this major achievement, the Valley continues to face many air quality challenges in meeting the current and upcoming air quality standards for ozone and particulate matter. The District has several air quality plans in place, including the *2007 Ozone Plan* (for the 1997 8-hour ozone standard), the *2008 PM2.5 Plan* (for the 1997 PM2.5 standard), and the *2012 PM2.5 Plan* (for the 2006 PM2.5 standard). The District is also in the early stages of developing attainment plans to address the 2008 8-hour ozone standard and the 2012 PM2.5 standard. An EPA finding of 1-hour ozone attainment will in no way diminish the intensity and magnitude of the work the Valley must continue to do under these plans. Rather, a finding of 1-hour ozone attainment will enable the Valley and all of its affected stakeholders to better focus its efforts and investments on these upcoming challenges.

If you have any questions regarding this matter, please contact me or Jessi Fierro at (559) 230-5800. The District thanks you and your staff for your assistance.

Sincerely,



Seyed Sadredin
Executive Director/Air Pollution Control Officer

Attachments

Cc:

Mary D. Nichols, Chairman, California Air Resources Board
Deborah Jordan, Director, US EPA Region 9
Kerry Drake, Associate Director, US EPA Region 9
Lynn Terry, Deputy Executive Officer, California Air Resources Board