

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Contingency Measure and Infeasibility Justification for the 2008 Ozone Standard in the Coachella Valley

Item #2

Public Consultation Meeting

January 31, 2024 and February 1, 2024

Outline



Overview of Coachella Valley Ozone Air Quality



Contingency Measure and Infeasibility Justification



Conclusion and Next Steps

Overview of Coachella Valley Ozone Air Quality

South Coast AQMD

- Local air pollution control agency

- South Coast Air Basin and Coachella Valley
- Largest of the 35 local air agencies in CA and in the U.S.
- 10,743 square miles
- 17 million residents

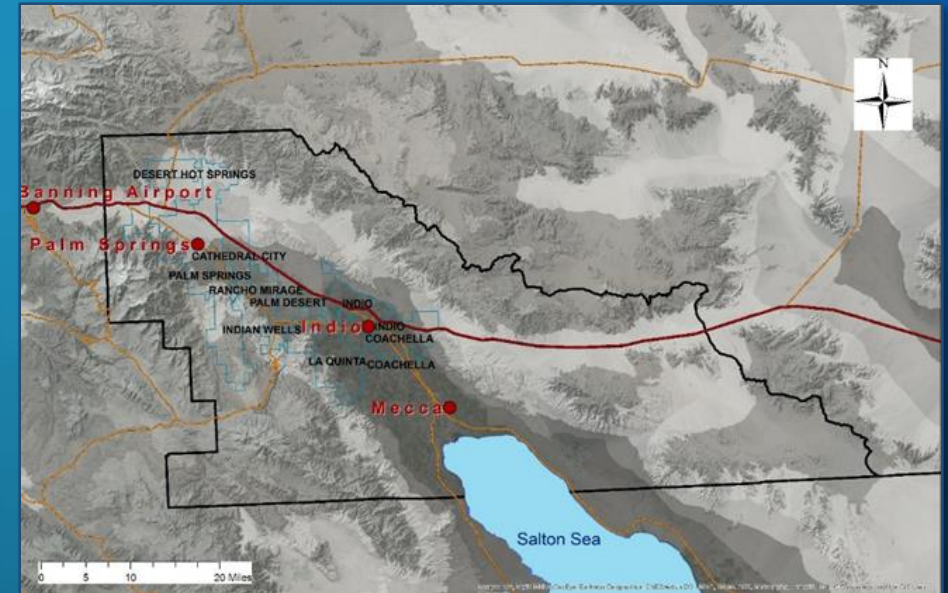
- Responsibilities

- Regulate emissions primarily from stationary sources
- Develop and implement plans to meet national air quality standards
- Permit and inspect 28,400 affected businesses
- Administer over \$100 million of incentive funding annually

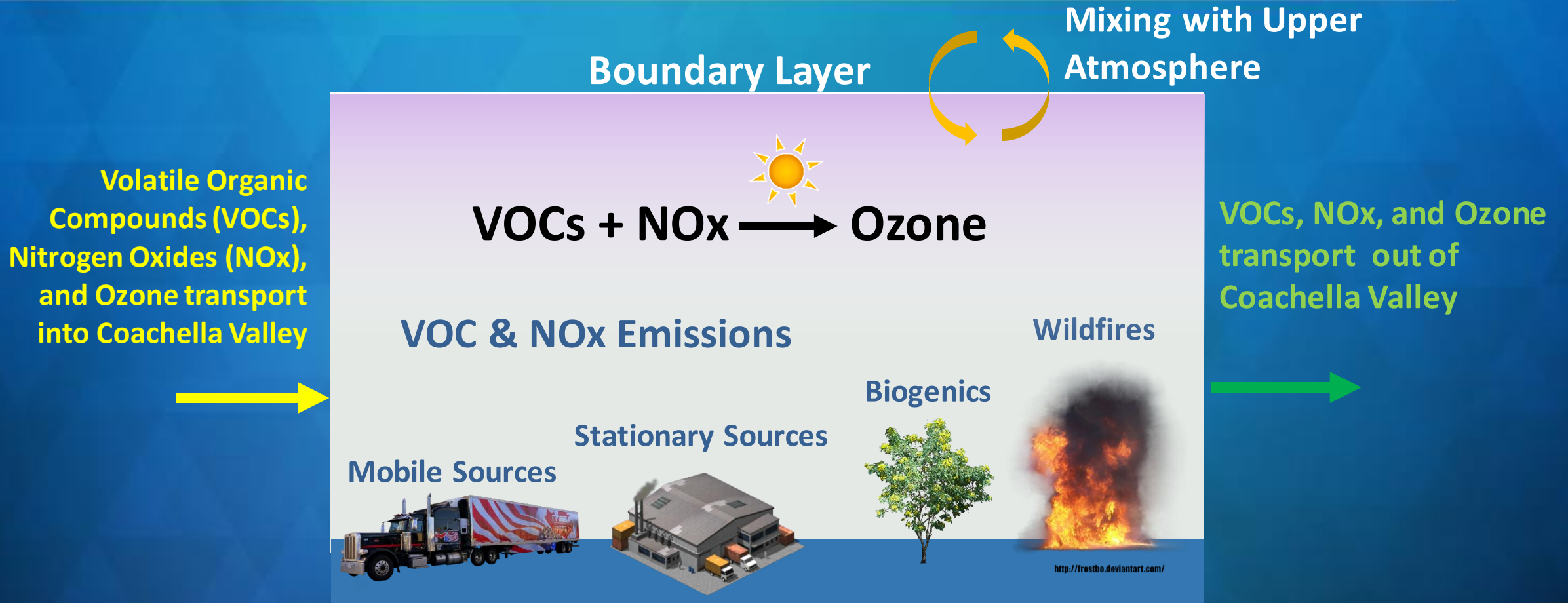


Coachella Valley

- The Coachella Valley is the desert portion of Riverside County in the Salton Sea Air Basin
- Located downwind of the South Coast Air Basin (Basin)
- Coachella Valley fails to meet federal ozone standards
 - As a result, South Coast AQMD must develop air quality plans and meet certain requirements for nonattainment areas under the federal Clean Air Act



Ozone Formation



Short-term exposure to high ozone levels can cause health problems including: damage to lung and airways, changes in heart function, increased inflammation, and in some cases premature death

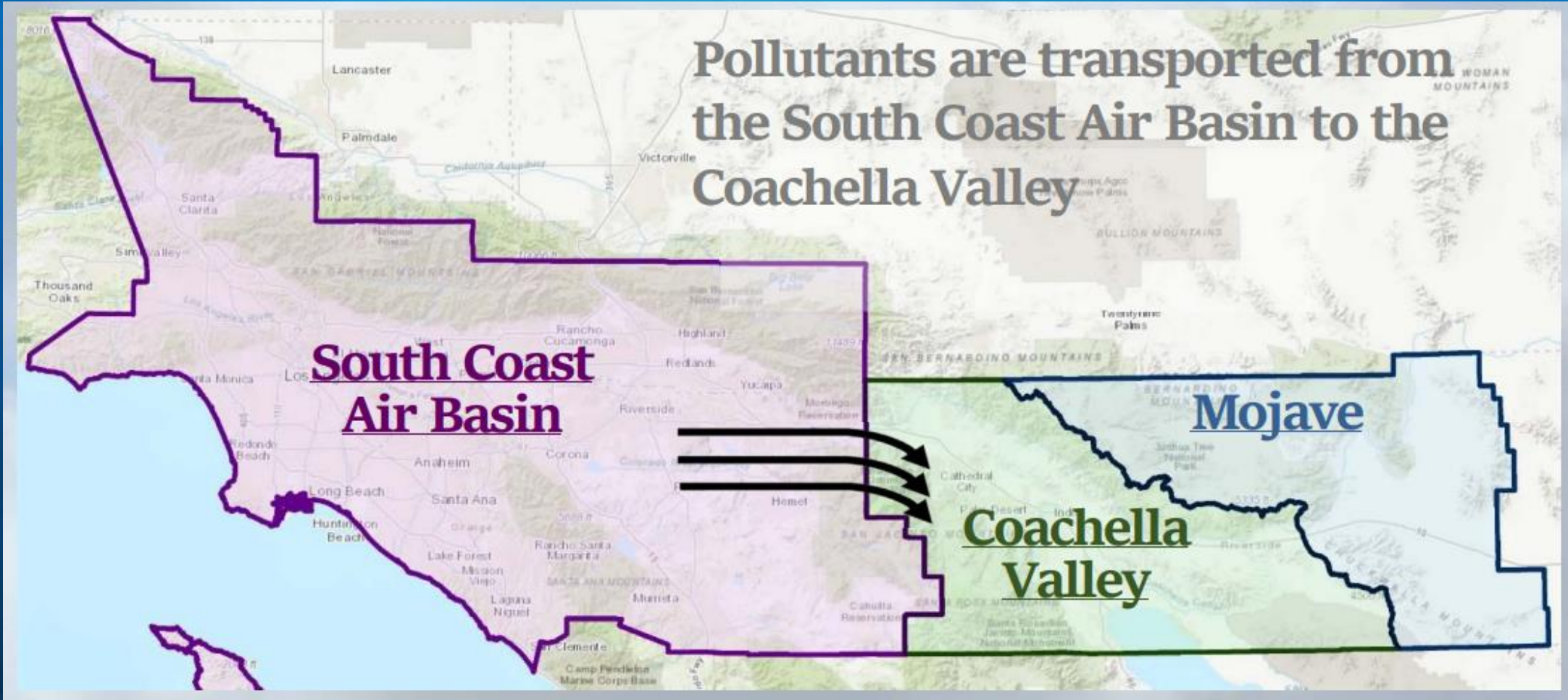
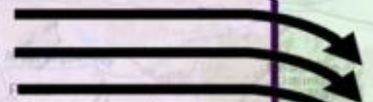
Ozone Transport into the Coachella Valley

Pollutants are transported from the South Coast Air Basin to the Coachella Valley

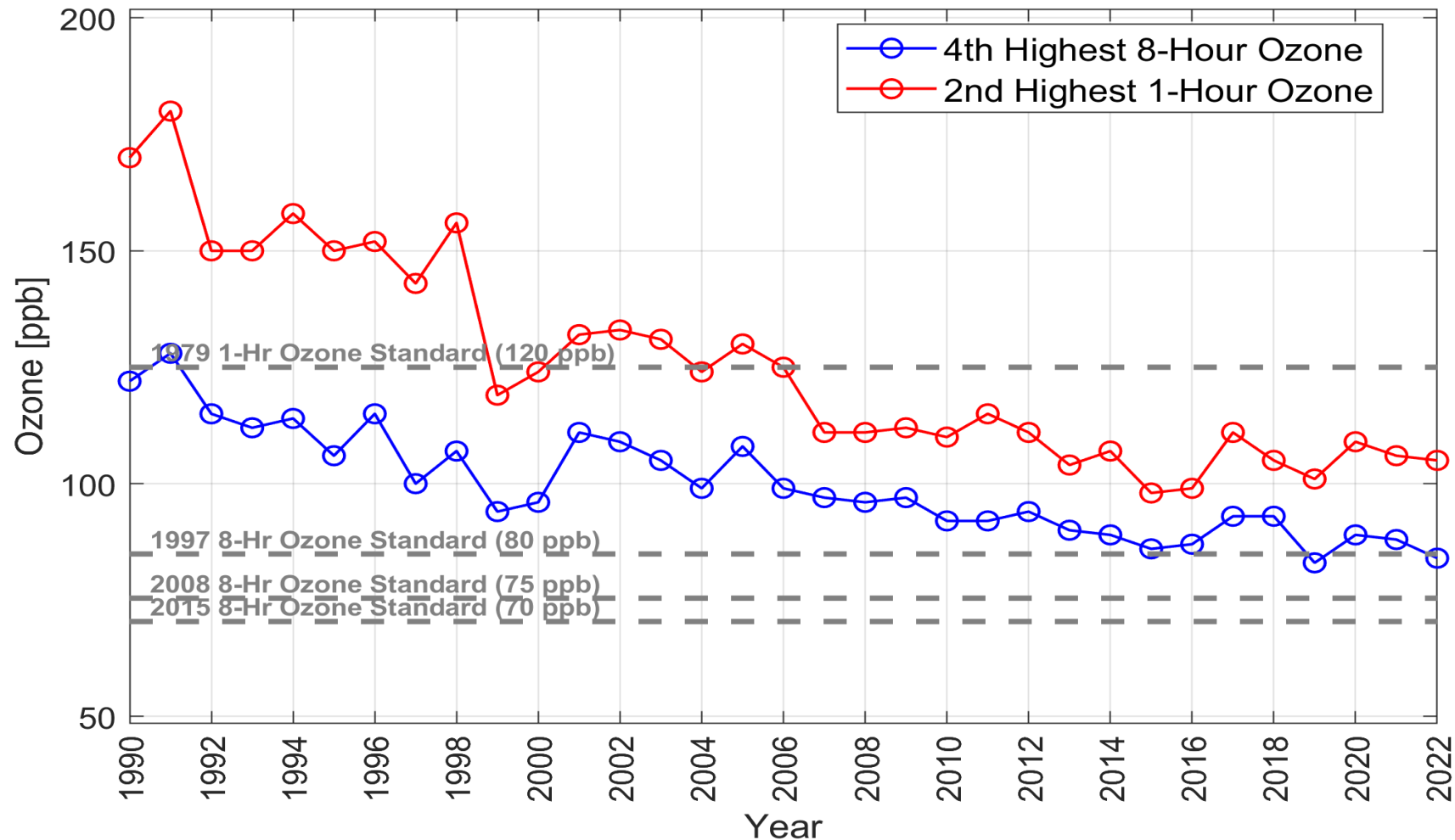
South Coast Air Basin

Mojave

Coachella Valley



Ozone Air Quality in Coachella Valley



Progress is being made to reduce ozone in Coachella Valley

NAAQS is the average of the three-year values

Coachella Valley Ozone Attainment Status

Ozone Standard	Level	Coachella Valley Classification	Attainment Date
2015 8-hour Ozone	70 ppb	Extreme	August 3, 2038
2008 8-hour Ozone	75 ppb	Extreme	July 20, 2032
1997 8-hour Ozone	80 ppb	Extreme	June 15, 2024
1979 1-hour Ozone	120 ppb	Attainment	-

This presentation is focused on addressing contingency measure elements for the 2008 8-hour ozone standard

State Implementation Plan (SIP) Background

Federal Clean Air Act requires states to:

- Meet National Ambient Air Quality Standards (NAAQS)
- Conduct a variety of planning exercises demonstrating how they will attain the NAAQS

States prepare plans to demonstrate how they will meet each NAAQS (ozone, PM2.5, etc.)

- Plans are comprehensive documents that include dozens of individual planning elements such as attainment and Reasonable Further Progress demonstrations, a control strategy, and contingency measures
- Each individual planning element can trigger sanctions if not submitted, is disapproved, or is not implemented



Overview of Coachella Valley SIP Actions for 2008 Ozone Standard

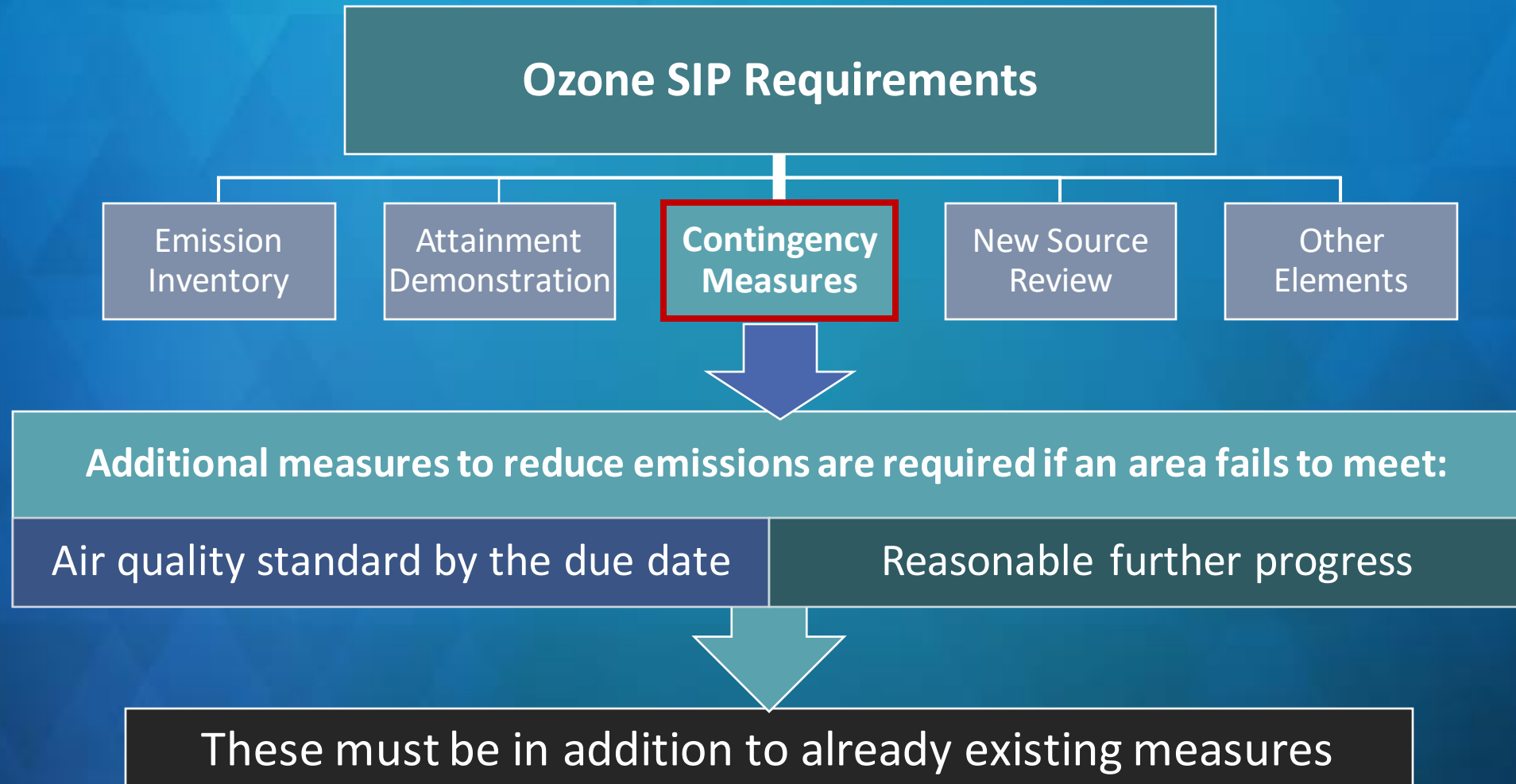
An attainment plan including contingency measures was submitted to U.S. EPA in 2017

U.S. EPA subsequently revised its policy on contingency measures in response to multiple lawsuits

South Coast AQMD withdrew contingency measure elements in June 2022 to avoid U.S. EPA disapproval

New Contingency Measure Elements due to U.S. EPA by April 30, 2024

Contingency Measures



Requirements for Contingency Measures



Rule/measure ready to implement without further significant action by State or U.S. EPA



Become effective within 60 days and achieve reductions within 2 years from the triggering event



Achieve emission reductions equivalent to one year's worth of progress



If less than one year's worth of reductions from the contingency measure, justification that no other measures are feasible



Areas like Coachella Valley in 'extreme' nonattainment already required to enact all feasible measures for attainment

Approach to Identify Contingency Measures

Step 1

- Thoroughly examined emission sources in Coachella Valley and identified applicable rules

Step 2

- Compared existing rule requirements with those in other areas to identify potential other measures

Step 3

- Reviewed the measures identified in Step 2 to determine if feasible* to serve as a contingency measure

Step 4

- If reduction is less than the required threshold, justification why no other measures are feasible

** Feasibility is determined based on technological or economic considerations*

Contingency Measure and Infeasibility Justification

Rule 463 – Organic Liquid Storage

- Applies to stationary above-ground organic liquid (e.g., gasoline) storage tanks to reduce VOC emissions
- South Coast AQMD is amending Rule 463 to introduce a contingency measure that would require more frequent inspections of organic liquid storage tanks using OGI in South Coast Air Basin and Coachella Valley
- For details, see Proposed Amended Rule page, <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-463>



<https://www.gst-ir.net/uploads/news/new-o4.jpg>



One Year's Worth of Reductions

- Base year of 2011 and 2031 attainment year consistent with previous plan*

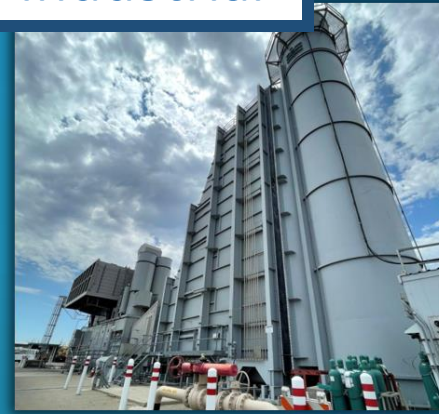
Emissions Inventory	NOx (tons per day)	VOCs (tons per day)
2011 Summer Planning	28.63	15.87
2031 Summer Planning	10.02	11.68
OYW of Reductions	0.33	0.15

- Reductions from the Rule 463 contingency measure will be less than one year's worth of progress. Therefore, infeasibility justification is needed to demonstrate that no other measures are feasible.

Overview of Contingency Measure Infeasibility Justification

- South Coast AQMD is required to enact all feasible measures, it is difficult to identify additional measures
- All emissions sources and applicable South Coast AQMD rules were compared with those in other jurisdictions
- Several potential measures identified, but were infeasible considering implementation timeline and/or technological limitations

Industrial



Residential



Commercial

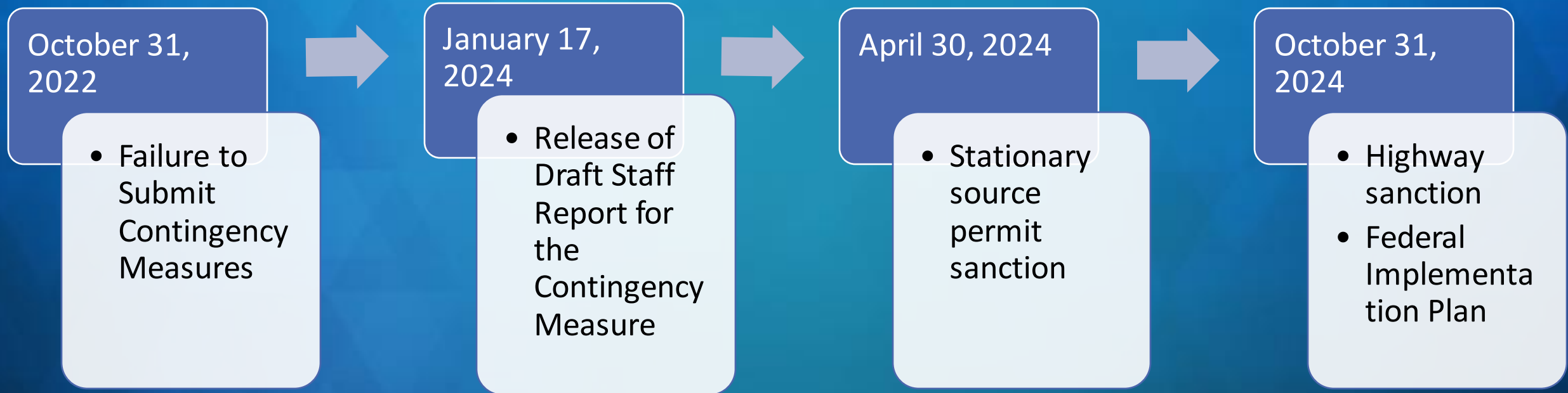


Indirect Source



Conclusion and Next Steps

Contingency Measure Timeline for the 2008 Ozone Standard



Summary



Coachella Valley is in extreme nonattainment for the 2008 ozone standard



Contingency measure is due to U.S. EPA by April 30, 2024, otherwise sanctions kick in



South Coast AQMD commits to consider adopting Rule 463 as contingency measure



The South Coast AQMD Governing Board will consider this contingency measure SIP on March 1, 2024. If adopted, SIP will be submitted to U.S. EPA via CARB.

Public Process



January 17,
2024

- Released Draft Staff Report

January 31 &
February 1,
2024

- Public Consultation Meetings

February 16,
2024

- Public Comment Deadline

February 16,
2024

- Mobile Source Committee

March 1,
2024

- Governing Board Hearing

March
2024

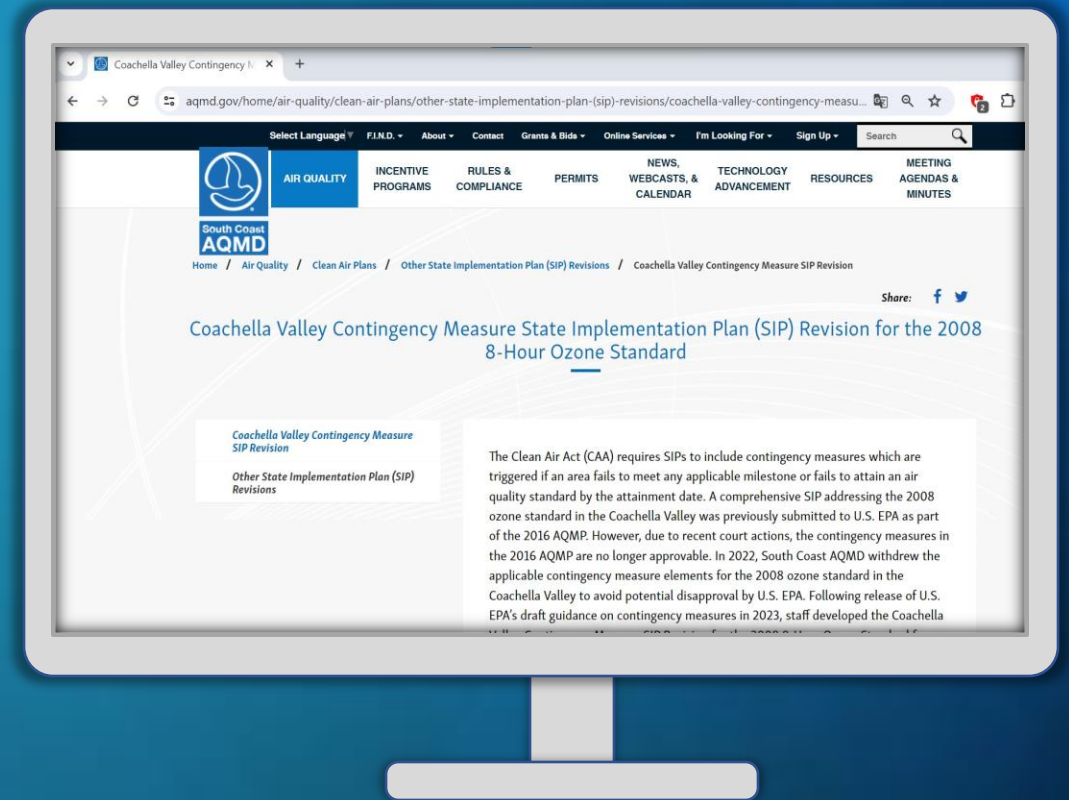
- Submission to U.S. EPA via CARB

Supporting Documents

All supporting documents are available on the Coachella Valley Contingency Measure SIP Revision website:

[https://www.aqmd.gov/home/air-quality/clean-air-plans/other-state-implementation-plan-\(sip\)-revisions/coachella-valley-contingency-measure-sip-revision](https://www.aqmd.gov/home/air-quality/clean-air-plans/other-state-implementation-plan-(sip)-revisions/coachella-valley-contingency-measure-sip-revision)

Point your smartphone camera here to be directed to the website



Submission of Comments

Please address questions, comments, documents, or other relevant information to:



Email: AQMPteam@aqmd.gov



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Please submit all written comments by **Friday, February 16, 2024**



California Smog Check Contingency Measure for the State Implementation Plan

South Coast AQMD Public Consultation Meeting
January 31, 2024 and February 1, 2024

CARB Contingency Measures Infeasibility Analysis

- Evaluate CARB regulations for contingency measures opportunities
 - Light, medium, and heavy-duty vehicles and trucks, airport shuttles, and buses
 - Off-road equipment, forklifts, lawn and garden, construction and mining, industrial equipment, commercial harbor craft, recreational boats, and ocean-going vessels
 - Port and rail operations, locomotives, space and water heaters
 - Consumer products, oil and gas, vapor recovery, gas cans
- Ensure reductions are beyond what is needed for meeting air quality standards

Contingency Options and Limitations

Options

- Require more stringent standards
- Pull forward compliance deadlines
- Increase percentage sales/ purchase requirements
- Enhanced testing/ enforcement requirements

Limitations

- Must go through regulatory process that takes up to five years
- Many regulations are technology forcing and generally the most stringent in the country
- Industry/fleets/ manufacturers need lead time to develop, manufacture, and deploy new technologies/ products
- Going to zero is needed for attainment and eliminates opportunities for contingency

California Smog Check Program

- Smog Check inspections required every two years
- Vehicles subject to Smog Check
 - 1976 and newer gas-powered vehicles
 - 1998 and newer diesel-powered vehicles 14,000 or less GVW
- 8 model-year-old and newer vehicles are currently exempt under Health and Safety Code section 44011(a)(4)(A) and (B) unless CARB finds removing the exemption is needed for the SIP
 - AB1274 amended the H&SC to include this provision in 2017
 - Must pay an annual smog abatement fee, a portion of which goes to the Carl Moyer Program

Smog Check Contingency Measure

Smog Check inspection exemptions would change if triggered in an applicable nonattainment area

First trigger

8 model years old and newer to
7 model years old and newer

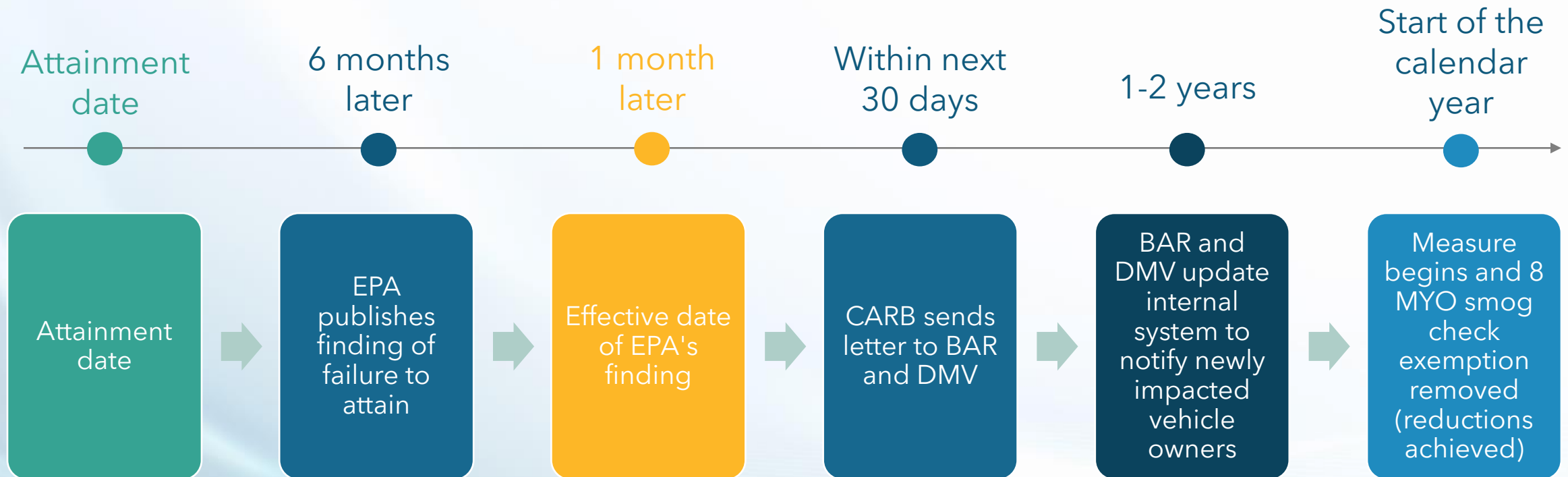
< 8 MYO → < 7 MYO

Second trigger

7 model year old and newer to
6 model year old and newer

< 7 MYO → < 6 MYO

Measure Implementation





Emissions Benefits

- Additional Smog Check inspections will identify new emissions control equipment failures and ensure they are repaired
- Reduces emissions from emissions control equipment that age over time that are repaired
- Provides benefits beyond current benefits of Smog Check program
- Real reductions from identifying additional failures providing ozone and pm benefits in communities

Public Process

- Released concept document for feedback and input on August 11, 2023
- Held a public workshop via Zoom on August 24, 2023 to present the concept and solicit comments in both English and Spanish
 - Comments were received in support of the measure, with one comment requesting examining the impacts to the Carl Moyer program more closely
- Released proposal for 30-day comment on September 15, 2023
- CARB Board adopted the measure on October 26, 2023
- CARB submitted the measure to EPA in November to be incorporated into the California SIP and to turn off sanctions clocks in the San Joaquin Valley and other areas
- U.S. EPA has proposed approval of the Smog Check Contingency Measure on December 20, 2023