

AIR RESOURCES BOARD

2020 L STREET
P.O. BOX 2815
SACRAMENTO, CA 95812



July 11, 1995

Ms. Felicia Marcus
Regional Administrator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105



Dear Ms. Marcus:

PM10 SIP Submittal for the Mono Basin

Enclosed are five copies of a revision to the California State Implementation Plan (SIP) for particulate matter (PM10) in the Mono Basin Planning Area (Mono Basin). The Mono Basin was designated as a moderate PM10 nonattainment area on November 29, 1993. The Mono Basin plan (plan) was prepared by the Great Basin Unified Air Pollution Control District (District).

This submittal consists of the following documentation:

1. The Mono Basin attainment plan.
2. Mono Basin attainment plan Appendix 4: Final Mono Lake Air Quality Study.
3. Mono Basin attainment plan Appendix 6: Mono Lake Basin Water Right Decision 1631.
4. Resolution 95-03 of the Great Basin District Board adopting the Mono Basin plan.
5. Notices of public hearings and proof of public notification.
6. Executive Order G125-186 of the Air Resources Board (ARB) approving the PM10 plan for the Mono Basin.

Background

The PM10 nonattainment problem is a direct result of water diversions from the tributaries leading into Mono Lake. These diversions have served to meet municipal water needs of the City of Los Angeles. Since the diversions began, Mono Lake water levels have declined, exposing vast shoreline areas which are the source of dust storms. Monitoring data indicate that these storms are the primary cause of regional exceedances of the national ambient air quality standard (NAAQS) for PM10.

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Control Strategy

The California Water Resources Control Board (WRCB) recently amended the City of Los Angeles' Water Right License to divert water from Mono Lake to require a gradual increase in the water elevation of Mono Lake. This will reduce the exposed areas that are the source of PM10 emissions. Staff from your agency, the District, and ARB testified at the hearing in support of this control strategy. In addition, the District performed extensive air quality modeling to determine the minimum lake level necessary to bring the region into attainment with the PM10 NAAQS.

After considering months of testimony on the multi-media impacts of the amendment, the WRCB adopted the Mono Lake Basin Water Right Decision 1631 (Decision 1631). Decision 1631 requires the City of Los Angeles to restore Mono Lake to 6391 feet above mean sea level, a level which is anticipated to result in attainment of the PM10 NAAQS within the Mono Basin Planning Area. The number of years it will take to reach this level depends upon water runoff. With extremely wet runoff years, the level could be reached by 2004; however, with normal runoff, the required water elevation would be reached in 2021.

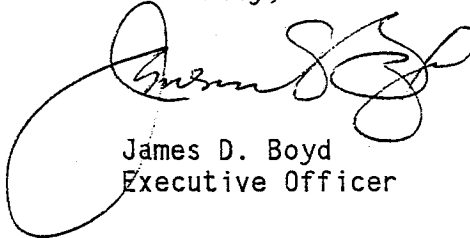
Conclusion

The plan's control strategy demonstrates attainment using the only feasible measure--a requirement for a gradual increase of Mono Lake's water level. Decision 1631 also includes a contingency provision requiring a special hearing if the water level has not reached 6391 feet above mean sea level by September 28, 2014.

We request the U.S. Environmental Protection Agency's full approval of the 1995 Mono Basin plan. While it is not possible to meet the moderate area attainment date of 1999, the region will make steady progress towards attainment. An extension of the attainment date for Mono Lake is necessary based on the nature of the problem. This moderate area SIP contains all provisions that would be required by a serious area SIP. No air quality gains would be achieved by reclassifying the region to serious.

If you have any questions regarding this submittal, please contact Mr. Dean Saito, Manager of the Southern California Liaison Section, at (916) 322-8279, or Mr. Paul Buttner of his staff at (916) 324-4006.

Sincerely,



James D. Boyd
Executive Officer

Enclosures

cc: Ellen Hardebeck, Air Pollution Control Officer
Great Basin Unified Air Pollution Control District

State of California
AIR RESOURCES BOARD

EXECUTIVE ORDER G125-186

WHEREAS, on July 1, 1987, the United States Environmental Protection Agency (EPA) promulgated national ambient air quality standards (NAAQS) and implementing regulations for particulate matter less than ten microns in diameter (PM10);

WHEREAS, on November 29, 1993, the EPA designated the Mono Basin Planning Area (Mono Basin) nonattainment for the 24-hour PM10 NAAQS;

WHEREAS, Sections 110, 172(a) and 172(c)(1) of the Federal Clean Air Act (hereinafter "the Act"; 42 U.S.C. Sections 7401 et seq.) as amended in 1990 require that all NAAQSs be attained as expeditiously as practicable through the implementation of all reasonably available control measures;

WHEREAS, Sections 188 and 189 of the Act (42 U.S.C. Sections 7513 and 7513(a)) set forth new requirements for PM10 pertaining to submittal of the State Implementation Plan (SIP) and dates by which the PM10 NAAQSs shall be attained;

WHEREAS, the Mono Basin is located within the jurisdiction of the Great Basin Unified Air Pollution Control District (District) which is authorized to adopt and enforce rules and regulations to achieve and maintain the NAAQS and to adopt a nonattainment area plan by Health and Safety Code Sections 40001 and 40702;

WHEREAS, an attainment plan (plan) for the Mono Basin was adopted by the District on May 17, 1995, as recorded by Resolution 95-03 of the same date;

WHEREAS, the Mono Basin plan demonstrates that the national 24-hour standard for PM10 will be attained by December 31, 2021, the earliest practicable date, as required by the Act;

WHEREAS, on September 28, 1994, the California Water Resources Control Board adopted Mono Lake Basin Water Right Decision 1631;

WHEREAS, Decision 1631 amends the Water Right Licenses for the City of Los Angeles providing for the only feasible PM10 control and contingency measures within the Mono Basin;

WHEREAS, the Mono Basin plan has been available for public review and comment as required by the Act and EPA regulations and public hearings have been conducted in the District's jurisdiction;

WHEREAS, Section 39602 of the Health and Safety Code designates the Air Resources Board (ARB or Board) as the state air pollution control agency for all purposes set forth in federal law and as the state agency responsible for the preparation of any SIP required by the Act;

WHEREAS, the Board is authorized by Health and Safety Code Sections 39600, 39602 and 41650-41652 to adopt SIP revisions proposed by local or regional air quality planning agencies if the requirements of the Act are met;

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WHEREAS, the Mono Basin plan was submitted to the ARB as a SIP revision by the District on May 26, 1995, in accordance with state and federal law and is incorporated by reference herein;

WHEREAS, Sections 39515 and 39516 of the Health and Safety Code delegate to the Executive Officer the authority to act for the Board in this matter;

WHEREAS, the California Environmental Quality Act and ARB regulations provide that no activity shall be approved if feasible alternatives or mitigation measures can be imposed to significantly reduce and adverse environmental impacts of the activity;

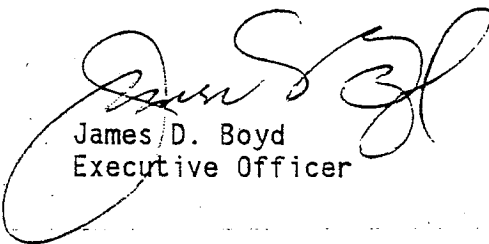
WHEREAS, the proposed control measures in the Mono Basin plan are not expected to result in any potential adverse environmental impact;

NOW, THEREFORE BE IT ORDERED that the State of California Air Resources Board hereby adopts and submits to the Environmental Protection Agency for its approval the 1995 Mono Basin plan as a revision to the California State Implementation Plan for PM10.

I certify, pursuant to 40 CFR 51.102, that the revised measures being submitted as a SIP revision were adopted after notice and public hearing as required by 40 CFR 51.102.

Executed this 30th Day of June 1995, at Sacramento, California.

CALIFORNIA AIR RESOURCES BOARD



James D. Boyd
Executive Officer