November 14, 2017

Ms. Alexis Strauss
Acting Regional Administrator
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dear Ms. Strauss:

The California Air Resources Board (CARB) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) the Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard (Ozone Plan) prepared by the Imperial County Air Pollution Control District (District). The Ozone Plan includes, in Appendix B, the Reasonably Available Control Technology Analysis for the 2017 Imperial County State Implementation Plan for the 2008 8-Hour Ozone Standard (RACT SIP). CARB adopted the Ozone Plan and supplemental analysis in the CARB Staff Report on October 26, 2017 as a revision to the California State Implementation Plan (SIP).

This package consists of one hard copy, and one compact disc containing an exact duplicate of the materials listed below:

1. September 14, 2017 letter from Mr. Matt Dessert, Air Pollution Control Officer for the District to Mr. Richard Corey, CARB Executive Officer, including the following relevant materials:
   a. Certified District Board Minute Order, adopting the Ozone Plan;
   b. District Ozone Plan with RACT SIP and other Appendices;
   c. Proof of Public Notice; and
   d. District Staff Report to the District Governing Board.

2. Public notice evidence and transcript for the CARB October 26, 2017 public meeting to consider adoption of the Ozone Plan and CARB Staff Report.

3. CARB Resolution 17-18 adopting the Ozone Plan as a revision to the California SIP.

4. CARB Staff Report.

5. Written comments regarding the Ozone Plan received by CARB.

6. CARB SIP Completeness Checklist.
The Ozone Plan includes an on-road motor vehicle emission budget for 2017. To ensure that any future updates to these budgets are used expeditiously in the conformity process, we 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 to last until the effective date of future U.S. EPA adequacy findings for replacement budgets.

Without the ability to replace the applicable emissions budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after the SIPs are submitted, due to the SIP approval process. We appreciate U.S. EPA’s willingness to work with us in our efforts to utilize motor vehicle emission budgets based on the most up-to-date, accurate data as soon as possible upon availability.

RACT SIP analyses are required for specific stationary sources for which U.S. EPA has published Control Technique Guidelines (CTG) and for major non-CTG stationary sources. Following U.S. EPA requirements, the District reviewed its existing stationary source rules to determine if those rules continue to meet RACT requirements. The RACT SIP shows that all RACT requirements are satisfied. CARB staff reviewed the RACT SIP for technical adequacy and completeness, as indicated on the SIP Completeness Checklist included with the submittal package.

CARB is committed to working with U.S. EPA staff to provide any additional clarifying information needed. If you have any questions, please call Mr. Kurt Karperos, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Mr. Jonathan Taylor, Interim Chief, Air Quality Planning and Science Division, at (916) 322-5350.

Sincerely,

Richard W. Corey
Executive Officer

Enclosures

cc: See next page.
cc: (w/ enclosure: CARB Resolution)

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