

**AIR POLLUTION CONTROL DISTRICT  
COUNTY OF SAN DIEGO**

**EIGHT-HOUR OZONE ATTAINMENT PLAN**

**WORKSHOP REPORT**

A notice of a workshop for the proposed Eight-Hour Ozone Attainment Plan (Attainment Plan) was mailed to all San Diego County Air Pollution Control District (District) Permit to Operate holders. Notices were also mailed to the California Air Resources Board (ARB), the U.S. Environmental Protection Agency (EPA), and other interested parties.

The workshop was held on April 2, 2007, and was attended by 20 people. In addition to verbal comments received at the workshop, written comments were received from the San Diego Association of Governments (SANDAG). The comments and District responses are as follows:

**1. WORKSHOP COMMENT**

Will this proposed Attainment Plan require changes in District Rule 11 (Exemptions from Permit Requirements), or impose requirements that would apply to fume hoods?

**DISTRICT RESPONSE**

No. The proposed Attainment Plan relies on existing rules and regulations.

**2. WORKSHOP COMMENT**

Does the proposed Attainment Plan include a “worst case scenario” in case 2007 is an anomalously high ozone year, similar to 2006?

**DISTRICT RESPONSE**

Anomalously high ozone concentrations in 2007 would not trigger any additional federal requirements. However, because the proposed Attainment Plan demonstrates attainment in 2008, if the fourth-high daily maximum eight-hour ozone concentration in 2008 exceeds 0.08 part per million (the level of the ozone standard), then the District would be required to develop a revised Attainment Plan to identify additional emission reductions as necessary to demonstrate expeditious attainment.

**3. WORKSHOP COMMENT**

Would possible future classification of San Diego County under Subpart 2 of the Clean Air Act require more stringent regulations on industry?

**DISTRICT RESPONSE**

Because San Diego County has attained the former one-hour ozone standard, EPA determined that the region is subject only to the more general requirements of Subpart 1 of the Clean Air Act for purposes of attaining the eight-hour ozone standard. However, ongoing litigation against EPA calls into question whether EPA must apply the more prescriptive requirements of Subpart 2 to San Diego County.

If, as a result of eventual resolution of the ongoing litigation, San Diego County were classified under Subpart 2, the District would be required to reevaluate its rules in the State Implementation Plan (SIP) to determine whether they still represent Reasonably Available Control Technology (RACT) at that time. If they do not, then rule amendments to satisfy RACT requirements may be necessary. However, because the District already adopts every feasible control measure and requires Best Available Retrofit Control Technology (BARCT) pursuant to stringent State law, District rules are likely to satisfy federal RACT requirements. Therefore, if the District is classified under Subpart 2, it may be necessary to consider submitting existing BARCT rules into the SIP to ensure compliance with federal RACT requirements. Further, if more stringent control requirements for any source category have become feasible and cost-effective for implementation in San Diego County by that time, then the District would be required to adopt those feasible requirements and submit them into the SIP.

**4. WORKSHOP COMMENT**

Does the District utilize mobile monitoring stations to locate and identify gross emitting sources?

**DISTRICT RESPONSE**

No. The District inspects emitting facilities annually to ensure compliance with District rules. Sources are also periodically tested to ensure their emission rates comply with the emission limits specified in District rules.

**5. SANDAG COMMENT**

In Figure 1-2 (Man-Made Sources of Ozone-Forming Emissions), the District may want to include an image that contains more types of mobile sources such as ships, trains, etc.

**DISTRICT RESPONSE**

The District agrees, and the final document will reflect the suggestion.

## 6. **SANDAG COMMENT**

The discussion of Transportation Control Measures lists a number of High Occupancy Vehicle (HOV)/Managed Lanes projects. A more complete description is as follows:

- Managed lane facilities on:
  - I-5 from I-805 to Vandegrift Blvd.
  - I-15 from SR 163 to SR 78
  - I-805 from SR 905 to I-5
  - SR 52 from I-15 to SR 125
- One HOV lane in each direction on:
  - I-5 from SR 905 to I-805
  - I-8 from SR 125 to 2<sup>nd</sup> Street
  - SR 52 from I-805 to I-15
  - SR 54/SR 125 from I-5 to SR 94
  - SR 56 from I-5 to I-15
  - SR 78 from I-5 to I-15
  - SR 94/125 from I-5 to I-8
- Direct HOV to HOV connectors are included at the following freeway interchanges:
  - I-5 to I-805: North to North & South to South
  - I-15 to SR 78: East to South & North to West
  - I-15 to SR 94: South to West & East to North
  - I-805 to SR 52: West to North & South to East

## **DISTRICT RESPONSE**

The final document will reflect the suggestion.