IMPERIAL COUNTY
Mitigation plan for historically documented and known seasonal high wind events
40 CFR 51.930(b)(2)(iii)

Provisions for periodic review and evaluation of the Mitigation Plan and its implementation and effectiveness by the State and all interested stakeholders.

The CARB completed its review and the US EPA affirmed the completeness of the Imperial County Final High Wind Mitigation Plan on December 4, 2018.

Per the provisions of the periodic review and evaluation of the Mitigation Plan and its implementation and effectiveness [***40 CFR 51.930(b)(2)(iii)***] the Imperial County Air Pollution Control District is accepting comments and suggestions for the next revision of the High Wind Mitigation Plan.

The review period will end December 4, 2021. The Air District will submit a revision by January 2022 to CARB.

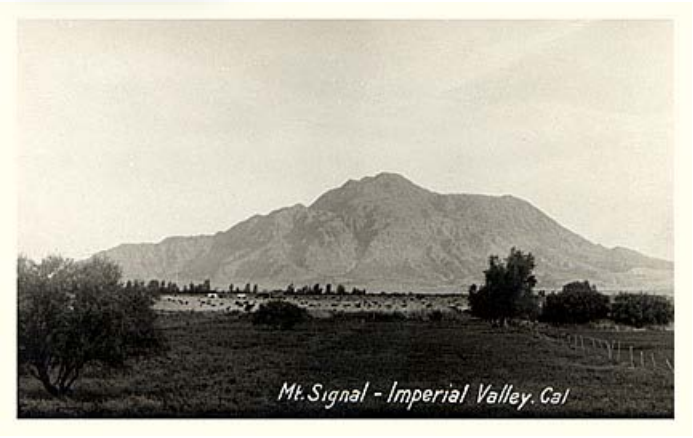
How the document is broken down:
The introduction provide the reader a background into the purpose of the document, how the exceptional events rule evolved, a description of the geography, meteorology and the PM10 status in Imperial County.

Section II specifically addresses the code section requiring the development and implementation of a mitigation plan for areas identified by the US EPA as having historically documented seasonal high wind events.

Section III identifies the procedures by code for the submission of the Mitigation Plan.

Please email or mail in all comments by December 4, 2021 to
Monica N. Soucier
150 S 9th Street
El Centro, CA 92243

Or by email at monicasoucier@co.imperial.ca.us



Black and White Postcard Published by the Barbara Worth Hotel-Allan McCollum; http://allanmccollum.net/amcimages/mtsignal13.jpeg

HIGH WIND EXCEPTIONAL EVENT FUGITIVE DUST MITIGATION PLAN

For Imperial County

SUMMARY

In keeping with the Air District's mission to protect the public health and consistent with the principles of the Clean Air Act the Imperial County Air Pollution Control District has prepared a mitigation plan to help address historically documented and known seasonal high wind events

Imperial County Air Pollution Control District

Planning Division

TABLE OF CONTENTS

FIGURES

I INTRODUCTION

I.1 Purpose

In keeping with the United States Environmental Protection Agency's (US EPA) final rulemaking for the "Treatment of Data Influenced by Exceptional Events", published October 3, 2016, areas with "known seasonal" or "historically documented" exceptional events are required to develop and implement a Mitigation Plan, codified as Title 40 of the Code of Federal Regulations (CFR) section 51.930 (40 CFR 51.930)

When States request the exclusion of air quality data due to an exceptional event the States must take appropriate and reasonable actions to protect the public health from exceedances or violations of the National Ambient Air Quality Standards (NAAQS). At a minimum, a State must:

- Provide for prompt public notification whenever air quality concentrations exceed or are expected to exceed an applicable ambient air quality standard.
- Provide for public education concerning actions that individuals may take to reduce exposures to unhealthy levels of air quality during and following an exceptional event.
- Provide for the implementation of appropriate measures to protect public health from exceedances or violations of ambient air quality standards caused by exceptional events.

The Imperial County Air Pollution Control District (ICAPCD) has prepared this "High Wind Exceptional Event Fugitive Dust Mitigation Plan" for the Particulate Matter Less than 10 microns (PM_{10}) nonattainment area for Imperial County.

I.2 Exceptional Events Rule Revisions

The earliest guidance issued by the US EPA regarding the exclusion of ambient PM_{10} air quality data known as the natural event policy occurred in May of 1996. The policy represented the US EPA's interpretation of the Clean Air Act Section 188(f) and Appendix K of 40 CFR, Part 50. Imperial County adopted its Natural Events Action Plan August 9, 2005.

As a response to stakeholder concerns on March 22, 2007, the US EPA adopted the "Treatment of Data Influenced by Exceptional Events Rule" (Exceptional Events Rule) to govern the review and handling of certain air quality monitoring data for which the normal planning and regulatory processes are not appropriate. Under the terms of the rule, the US EPA may exclude monitored exceedances of the NAAQS if a State adequately demonstrates that an exceptional event caused the exceedance. While the 2007 Exceptional Events Rule required States to take reasonable measures to mitigate the impacts of an exceptional event the rule did not require States to submit their identified measures to the US EPA or to notify the US EPA of the measures a State planned to take.

The 2007 and 2016 revised Exceptional Events Rule added sections 40 CFR §50.1(j)-(r) [Definitions], 50.14(a)-(c) and 51.930(a)-(b) to 40 CFR. These sections contain definitions, criteria for US EPA concurrence, procedural requirements and requirements for State demonstrations. The demonstration must satisfy all of the rule criteria for US EPA to concur with the requested exclusion of air quality data from regulatory decisions.

Title 40 CFR §50.14(c)(3)(iv) outlines the elements that a demonstration must include for air quality data to be excluded:

- "A narrative conceptual model that describes the event(s) causing the exceedance or violation and a discussion of how emissions from the event(s) led to the exceedance or violation at the affected monitor(s);"
- "A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation;"
- "Analyses comparing the claimed event-influenced concentration(s) to concentrations at the same monitoring site at other times" to support the requirement above;
- "A demonstration that the event was both not reasonably controllable and not reasonably preventable;" and
- "A demonstration that the event was a human activity that is unlikely to recur at a particular location or was a natural event."

Aside from the above, a State must demonstrate that it has met several procedural requirements during the demonstration process, including:

1 Submission to the Administrator of an Initial Notification of Potential Exceptional Event and flagging of the affected data in US EPA's Air Quality System (AQS) as described in 40 CFR §50.14(c)(2)(i),

2 Documentation of fulfillment of the public comment process described in 40 CFR §50.14(c)(3)(v), and

3 Implementation of any applicable mitigation requirements (Mitigation Plan) as described in 40 CFR §51.930.

I.3 Fugitive Dust – Particulate Matter Less than 10 Microns (PM_{10})

PM_{10} refers to particles with an aerodynamic diameter of 10 microns or smaller. For comparison, the diameter of a human hair is about 50 to 100 microns. Exposure to PM_{10} aggravates a number of respiratory illnesses and may even cause early death in people with existing heart and lung disease. PM_{10} includes the subgroup of finer particles with aerodynamic diameter of 2.5 microns and smaller ($PM_{2.5}$). These finer particles pose an increased health risk because they can deposit deep in the lung and contain substances that are particularly harmful to human health. PM is a mixture of substances that include elements such as carbon and metals; compounds such as nitrates, organic compounds, and sulfates; and complex mixtures such as diesel exhaust and dust. These substances may occur as solid particles or liquid droplets. Some particles emitted directly into the atmosphere include dust. Others, referred to as secondary particles, result from the transformation of gases into particles through physical and chemical processes in the atmosphere.

I.4 Geographical Description

According to the United States Census Bureau, Imperial County has a total area of 4,482 square miles, of which 4,177 square miles is land and 305 square miles is water. Much of Imperial County is below sea level and is part of the Colorado Desert an extension of the larger Sonoran Desert. Bordered by San Diego County to the west, Riverside County to the north, Arizona to the east and Mexico to the south, Imperial County is comprised of seven incorporated cities, including the unincorporated township of Niland that are surrounded by agricultural lands. Combined these cities and agricultural lands make up Imperial Valley (**Figure 1-1**).

Surrounding the Imperial Valley to the west, east, north and south are naturally open desert areas, the Salton Sea to the north, the Chocolate Mountains to the east, distinctive mountain ranges along the San Diego/Imperial County borderline, and to the south the metropolitan city of Mexicali, Mexico with a population over a million.

Several geological aspects from within and outside of Imperial County affect air quality. The region along the Chocolate Mountains within the eastern section of Imperial County

is dominated by the transition of the tectonic plate boundary from rift to fault. The southernmost strands of the San Andreas Fault connect the northern-most extensions of the East Pacific rise. Consequently, the region is subject to earthquakes and the crust is being stretched, resulting in a sinking of the terrain over time.

The distinctive regions along the southeastern and southwestern portions of the San Diego/Imperial County borderline include the distinctive peninsular mountain ranges, which comprise the eastern two-thirds of San Diego County and are primarily undeveloped backcountry with a native plant community known as chaparral. The In-Ko-Pah Mountains and the Jacumba Mountains border Mexico and Imperial County and provide distinctive weathered dramatic piles of residual boulders. The Anza-Borrego Desert State Park contains characteristically erosive regions, such as sand dunes, that extend from the Santa Rosa Mountains into northern Baja California in Mexico. Some of the regions included within the Anza-Borrego Desert State Park are the Vallecito Mountains, the Carrizo Badlands and the Coyote Mountains. Much of the terrain is loose dirt, interspersed with sandstone and occasional quartz veins. In all, the Anza-Borrego Desert State Park lies in a unique geologic setting along the western margin of the Salton Trough. The area extends north from the Gulf of California (Baja California) to San Gorgonio Pass and from the eastern rim of the Peninsular Ranges eastward to the San Andreas Fault zone along the far side of the Coachella Valley.

These areas are sources of transported fugitive dust emissions into Imperial County when westerly winds funnel through the unique landforms causing in some cases wind tunnels that cause increase in wind speeds. During the monsoonal season, natural open desert areas to the east, southeast, and south of Imperial County are sources of transported fugitive dust emissions when thunderstorms cause outflows to blow winds across natural opens desert areas within Arizona and Mexico.

[Intentionally left blank]

FIGURE 1-1
IMPERIAL COUNTY

Fig 1-1: Imperial County a Southern California border region, within far southeast California bordering Arizona and Mexico has a small most economically diverse region with a population of 174,528

[Intentionally left blank]

I.5 Meteorological Setting

Imperial County is part of the Colorado Desert, which is a subdivision of the larger Sonoran Desert (**Figure 1-2**) encompassing approximately 7 million acres (28,000 km^2). The desert area encompasses Imperial County and includes parts of San Diego County, Riverside County, and a small part of San Bernardino County.

FIGURE 1-2
SONORAN DESERT REGION

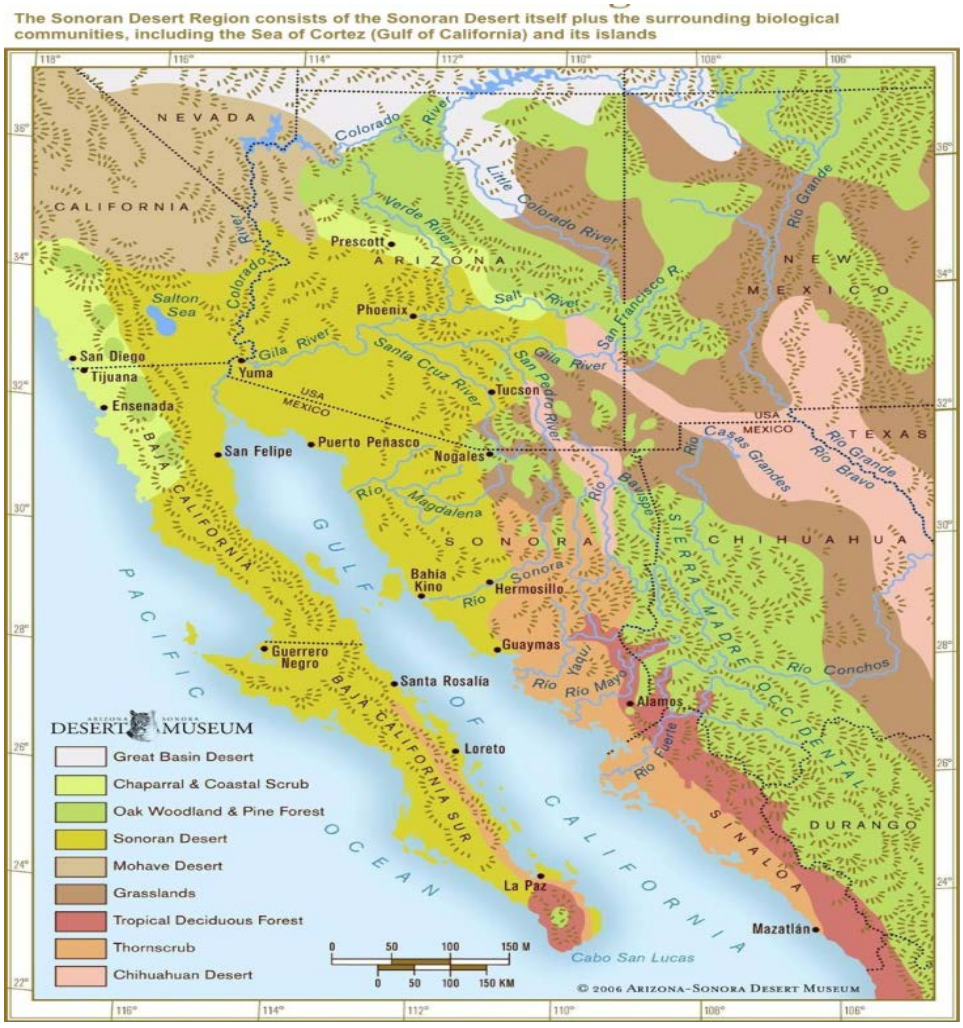


Fig 1-2: Depicts the magnitude of the region known as the Sonoran Desert. Source: Arizona-Sonora Desert Museum at http://desertmuseum.org/center/map.php

The Colorado Desert's climate distinguishes it from other deserts. The region experiences greater summer daytime temperatures than higher-elevation deserts and almost never experiences frost. In addition, the Colorado Desert experiences two rainy seasons per year (in the winter and late summer), especially toward the southern portion of the region

which includes a portion of San Diego County.

The west coast Peninsular Ranges, or other west ranges, of Southern California–northern Baja California, block most eastern Pacific coastal air and rains, producing an arid climate. Other short or longer-term weather events can move in from the Gulf of California to the south, and are often active in the summer monsoons. These include remnants of Pacific hurricanes, storms from the southern tropical jet stream, and the northern Inter Tropical Convergence Zone (ITCZ).

The combination of meteorology and topography create the ideal conditions for the transport and trapping of particulates. The bowl like topography, created by the below sea level elevation, allows the eroding mountain ranges and the expansive natural open desert areas within the counties of San Diego, Riverside, Arizona and Mexico to transport fugitive dust into Imperial County during windy days either from the west or from outflows created by thunderstorms from the south, and southeast.

I.6 Imperial County High Wind Event Meteorology

Analysis of high wind events, resulting in elevated PM_{10} concentrations, in Imperial County during the fall, winter, and spring are often due to strong winds associated with low-pressure systems and cold fronts. During the summer monsoon season, elevated PM_{10} concentrations are often due to wind flow aloft from the East or Southeast, known as the North American Monsoon (NAM)[1]. The NAM occurs when there is a shift in wind patterns during the summer, which occurs as Mexico and the southwest United States warm under intense solar heating reversing airflow from dry land areas to moist ocean areas. Consequently, the prevailing winds start to flow from moist ocean areas into dry land areas.

Historical analysis have defined meteorological mechanisms that lead to high wind elevated PM_{10} events in Imperial County and they include:

- **Type 1:** Pacific storms and frontal passages;
- **Type 2:** Strong pressure and surface pressure gradients;
- **Type 3:** Monsoonal Gulf Surges from Mexico; thunderstorm downburst, outflow winds and gust fronts from thunderstorms
- **Type 4:** Santa Ana wind events

[1] National Weather Service document "North American Monsoon" public domain material from the NWS Forecast Office Tucson, Arizona

Type 1 events, the passage of storm systems, create strong winds through the mountain passes and desert slopes. As the frontal system passes, surface wind shifts causing increases in wind speeds. Although these storms often produce little to no precipitation winds blow along the desert slopes at much high speeds, such as 60 mph while winds on the desert floor reduce but remain elevated, such as 50 mph. The impressive dust plumes are typically captured by Satellite and can be seen traveling from the mountains beyond Imperial County. During these events, the National Weather Service (NWS) San Diego office often issues wind advisories for the San Diego Mountains and deserts, typically advising of reduced visibility due to blowing dust along Interstate 8, the Coachella Valley and other desert communities within the San Diego service area. The winds are associated with a dynamic, fast-moving winter, spring or fall storm. Cold fronts, dry or wet, often accompany the weather system.

Type 2 events occur far more frequently than other wind events. They are responsible for the majority of the exceptional event episodes in Imperial County. These wind events occur when a low-pressure system moves inland from the Pacific Ocean. This can be an upper level trough moving inland over central-southern California, or sliding down from the Pacific Northwest into the Great Basin and extending southward into southern California. In either occurrence, the surface gradient tightens, producing a strong onshore flow and generating strong gusty westerly winds across the deserts and mountains of southeastern California. In many instances, **Type 1** and **Type 2** meteorological conditions can combine causing very strong winds in Imperial County. Much like **Type 1** events, the NWS office in San Diego typically issues wind advisories for the San Diego Mountains and deserts.

Type 3 are strong easterly-to-southerly winds produced by thunderstorm outflows. Triggering these outflows are monsoonal air masses (Gulf Surge) that move northward out of Mexico. The warm, moist air from the Gulf of Mexico spills into the southwest United States and promotes instability in the atmosphere. This convective activity produces thunderstorms in the atmosphere, which generates strong winds from outflow boundaries (gust fronts). Fast-moving outflows can and do reach Imperial County when thunderstorms combine within Arizona or Northern Mexico. Thunderstorm complexes that occur during the NAM in the desert southwest can produce dust storms called "haboobs" that are so intense that they look like a wall of dust moving across the landscape.

Type 4 events are Santa Ana wind events. They are the least common. These events occur when high pressure and cold temperatures over the Great Basin create northerly or northeasterly winds. Typically, the stronger Santa Ana winds occur at higher elevations to the north of Imperial County. However, occasionally the dynamics of the strong northerly

winds race across the high desert (Mojave Desert) where blowsand is transported into the bowl-like depression of Imperial County elevating PM_{10} levels. Type 3 events typically occur during November through January.

I.7 PM_{10} Non-Attainment Status

The US EPA issued its final ruling to the "Revisions to the National Ambient Air Quality Standards for Particulate Matter" on July 1, 1987. The final ruling took three decisive actions. First, it replaced Total Suspended Particulate Matter (TSP) as an indicator for particulate matter for the ambient standards with PM_{10}. Second, it replaced the 24-hour primary TSP standard with a 24-hour PM_{10} standard of 150 micrograms per cubic meter ($\mu g/m^3$) with no more than one expected exceedance per year. Third, the final ruling replaced the annual primary TSP standard with a PM_{10} standard of 50 $\mu g/m^3$. The ruling similarly announced new Federal Reference Methods for measuring PM_{10} and issued Appendix J and Appendix K to Part 50 as guidance.

Upon enactment of the 1990 Clean Air Act (CAA) amendments, Imperial County was classified as "Moderate" nonattainment for the PM_{10} NAAQS under the CAA sections 107(d)(4)(B) and 188(a). By November 15, 1991, such areas were required to develop and submit State Implementation Plan (SIP) revisions providing for, among other things, implementation of reasonably available control measures (RACM).

Partly to address the RACM requirement, ICAPCD adopted local Regulation VIII rules to control PM_{10} from sources of fugitive dust on October 10, 1994, and revised them on November 25, 1996. US EPA did not act on these versions of the rules with respect to the federally enforceable SIP.

On August 11, 2004, US EPA reclassified Imperial County as a "Serious" nonattainment area for PM_{10}. As a result, CAA section 189(b)(1)(B) required all Best Available Control Measures (BACM) to be implemented in the area within four years of the effective date of the reclassification, i.e., by September 10, 2008.

On November 8, 2005, partly to address the BACM requirement, ICAPCD revised the Regulation VIII rules to strengthen fugitive dust requirements. On July 8, 2010, US EPA finalized a limited approval of the 2005 version of Regulation VIII, finding that the seven Regulation VIII rules largely fulfilled the relevant CAA requirements. Simultaneously, US EPA also finalized a limited disapproval of the rules, identifying specific deficiencies. Addressing these deficiencies would fully demonstrate compliance with CAA requirements regarding BACM and enforceability.

September 2010, ICAPCD and the California Department of Parks and Recreation (DPR) filed petitions with the Ninth Circuit Federal Court of Appeals for review of US EPA's limited disapproval of the rules. After hearing oral argument on February 15, 2012, the Ninth Circuit directed the parties to consider mediation before rendering a decision on the litigation. On July 27, 2012, ICAPCD, DPR and US EPA reached a settlement agreement on a resolution to the dispute, which included a set of specific revisions to Regulation VIII, adopted by ICAPCD on October 16, 2012 and approved by US EPA April 22, 2013.

II 40 CFR 51.930 MITIGATION OF EXCEPTIONAL EVENTS

Section 51.930(b)(2) refers to the minimum plan components that must be included within mitigation plans for areas identified with "historically documented" or "known seasonal" events. The US EPA identified the Imperial Valley PM_{10} Nonattainment area as subject to the mitigation requirements. Following are the three minimum plan components described within 40 CFR 51.930(b)(2);

II.1 Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours. [***40 CFR 51.930(b)(2)(i)***]

In keeping with the ICAPCD's commitment to protect the public health the ICAPCD is committed to providing daily real-time current air quality information, analysis and air quality programs to the public. While the ICAPCD continues to utilize standard outreach programs such as informative brochures and outreach programs to communities and schools, most recent developments in social media and web-based tools have created access to near instantaneous information for public use. Web-based information utilized by the ICAPCD includes the ICAPCD home page at www.co.imperial.ca.us and the air quality alert page at www.imperalvalleyair.org.

Supporting the dissemination of air quality information is a robust near real-time air-monitoring network that supports the mapping of pollutants within the major cities within Imperial County. The data allows for analysis and forecasting of air quality concentrations for up to seven days helping the public, schools and industry to make informed decisions about their daily activities.

The home page for the ICAPCD at www.co.imperial.ca.us, provides meteorological forecasting information as advisories. These advisories provide current and forecast information summarized from NWS issued notices and area forecast discussion from the San Diego and Phoenix offices. Combined these advisories provide current and forecast

winds, thunderstorms, troughs and any other meteorological event that may suspend or transport particulate matter in Imperial County. In addition, the ICAPCD publishes urgent weather and hazardous weather notices issued by either NWS office, such as blowing dust advisories and/or high wind advisories. The site similarly provides information regarding the health effects associated with elevated concentrations of pollutants, complaint procedures, along with a variety of notices pertinent to updates on rules, State Implementation Plans, programs, funding and information regarding the Air Quality Flag Program. With the enhancement to the air-monitoring network, the ICAPCD installed eight cameras. At any given minute of the day, the public may view any one of the eight camera's to view conditions in El Centro, Brawley, Westmorland or Niland. The images refresh at 30 second intervals and provide a visual of the meteorological conditions as near real-time as possible.

The air quality site at www.imperialvalleyair.org provides air quality and health information, notifications, alerts and forecast information that may affect air quality in Imperial County. Several products are available to the public and the ICAPCD via the site. For example, the site includes the mapping of near real-time pollutants as the Air Quality Index (AQI) as support for issued near real time air alerts, air quality summaries, short-term and long-term air quality forecasts all of which provide health impacts and meteorological information to the help the public make informed decisions regarding their daily activities.

Transmitted warnings of current air pollution events occur via the ICAPCD website, mobile application, ICAPCD sponsored e-mails or texts. The released notifications reach not only the public but reach media such as the local radio stations and the Imperial Valley Press. Although the ICAPCD encourages the publication of the information as a "Public Service Announcement", these publications occur as a single notice once a day. The pollutants that drive the notifications seasonally are Ozone, during the summer months June through September, $PM_{2.5}$ during the winter months, December through February and PM_{10} throughout the year as west winds blow, winter, spring and fall storms pass, and during the monsoonal period June through September. Preceding the natural events are wind and dust advisories while during the event, similar posted notifications advice the public of the potential for elevated concentrations at or above Unhealthy Levels for Sensitive Groups. The notices provide meteorological and concentration information with recommendations to the public about how to reduce exposure. An example of the issued alert by the ICAPCD when the AQI level for Unhealthy for Sensitive Groups reads:

> People with respiratory or heart disease, the elderly, and children are the groups most at risk, especially when they are physically active. There is an increased likelihood of respiratory symptoms in sensitive individuals, and aggravation of

> heart or lung disease and premature mortality in persons with cardiopulmonary disease and the elderly. U.S. EPA cautions "people with heart or lung disease, older adults, and children should reduce prolonged or heavy exertion." 'Prolonged' generally means four or more hours with short rest periods. 'Heavy exertion' is that which would increase the resting breathing rate four fold or greater. You can reduce exposure to particulate material by: - Reducing the intensity and duration of your outdoor activities – Postponing outdoor activities to days when particulate levels are lower

An example of the issued forecast alert by the ICAPCD when forecast indicate that the AQI level for Unhealthy for Sensitive Groups is possible reads:

> Today, gusty winds associated with monsoonal thunderstorms will lead to areas of blowing dust, increasing particle concentrations. Therefore, AQI levels will be Unhealthy for Sensitive Groups. Tomorrow, decreasing thunderstorm activity will reduce blowing dust in the Imperial Valley. However, southeasterly winds will bring pollutants into the region, and mostly sunny skies will enhance ozone production. Therefore, AQI levels will be Moderate.

II.2 Steps to identify, study and implement mitigating measures, including the four approaches listed below. [***40 CFR 51.930(b)(2)(ii)***]

❖ Measures to abate or minimize contributing controllable sources of identified pollutants. [***40 CFR 51.930(b)(2)(ii)(A)***]

The ICAPCD adopted a suite of rules, known as Regulation VIII, to address fugitive dust emissions within Imperial County. Regulation VIII consists of seven interrelated rules designed to limit emissions of PM_{10} from anthropogenic fugitive dust sources in Imperial County.

Rule 800, General Requirements for Control of Fine Particulate Matter, provides definitions, a compliance schedule, exemptions and other requirements generally applicable to all seven rules. It requires the United States Bureau of Land Management (BLM), United States Border Patrol (BP) and DPR to submit dust control plans (DCP) to mitigate fugitive dust from areas and/or activities under their control. Appendices A and B within Rule 800 describe methods for determining compliance with opacity and surface stabilization requirements in Rules 801 through 806.

Rule 801, Construction and Earthmoving Activities, establishes a 20% opacity limit and control requirements for construction and earthmoving activities. Affected sources must submit a DCP and comply with other portions of Regulation VIII regarding bulk materials,

carry-out and track-out, and paved and unpaved roads. The rule exempts single family homes and waives the 20% opacity limit in winds over 25 mph under certain conditions.

Rule 802, Bulk Materials, establishes a 20% opacity limit and other requirements to control dust from bulk material handling, storage, transport and hauling.

Rule 803, Carry-Out and Track-Out, establishes requirements to prevent and clean-up mud and dirt transported onto paved roads from unpaved roads and areas.

Rule 804, Open Areas, establishes a 20% opacity limit and requires land owners to prevent vehicular trespass and stabilize disturbed soil on open areas larger than 0.5 acres in urban areas, and larger than three acres in rural areas. Agricultural operations are exempted.

Rule 805, Paved and Unpaved Roads, establishes a 20% opacity limit and control requirements for unpaved haul and access roads, canal roads and traffic areas that meet certain size or traffic thresholds. It also prohibits construction of new unpaved roads in certain circumstances. Single-family residences and agricultural operations are exempted.

Rule 806, Conservation Management Practices, requires agricultural operation sites greater than 40 acres to implement at least one conservation management practice (CMP) for each of several activities that often generates dust at agricultural operations. In addition, agricultural operation sites must prepare a CMP plan describing how they comply with Rule 806, and must make the CMP plan available to the ICAPCD upon request.

Additional measures include the adoption of a Smoke Management Plan (SMP), and the identification of additional mitigation measures or conditions imposed through the California Environmental Quality Act (CEQA) process.

SMP Summary

There are 35 Air Pollution Control Districts or Air Quality Management Districts in California, which are required to implement a district-wide smoke management program. The regulatory basis for California's Smoke Management Program, codified under Title 17 of the California Code of Regulations is the "Smoke Management Guidelines for Agricultural and Prescribed Burning" (Guidelines). California's 1987 Guidelines revised to improve interagency coordination, to avoid smoke episodes, and to provide continued public safety provided adequate opportunity for necessary open burning. Approval of the revisions to the 1987 Guidelines occurred March 14, 2001. All air districts, with the exception of the San Joaquin Valley Air Pollution Control District (SJAPCD) were required

to update their existing rules and Smoke Management Plans to conform to the most recent update to the Guidelines.

Section 80150 of Title 17 specifies the special requirements for open burning in agricultural operations, the growing of crops and the raising of fowl or animals. This section specifically requires the ICAPCD to have rules and regulations that require permits that contain requirements that minimize smoke impacts from agricultural burning.

On a daily basis, the ICAPCD reviews surface meteorological reports from various airport agencies, the NWS, State fire agencies and CARB to help determine whether the day is a burn day. In order to assure minimal to no smoke affects, thus safeguarding the public health, the ICAPCD allocates field burns using a four-quadrant map of Imperial County. Finally, all permit holders are required to notice and advise members of the public of a potential burn also known as the Good Neighbor Policy.

A summary of the review process of development projects under the CEQA process. When new development, either commercial or residential intend to build the ICAPCD reviews potential impacts to air quality during the construction and operational phases of the projects. Determinations of potential significance, such as project-level emissions contributing to an exceedance and/or potentially causing an exceedance the ICAPCD requires mitigation measures or the imposition of conditions to the planning permit process that reduce or mitigate the excess emissions. For example, while solar farms have little to no direct long-term impact upon air quality on a project level analysis, cumulative impacts of PM_{10} may be significant. Therefore, all solar farms are required to develop and implement an Operational Dust Control Plan (ODCP) addressing actual, future and potential future sources of PM_{10} during the life of the project. There must be an approved and submitted ODCP's subject to annual review on file in order for these solar facilities to receive their Certificate of Occupancy.

- ❖ Methods to minimize public exposure to high concentrations of identified pollutants. [***40 CFR 51.930(b)(2)(ii)(B)***]

The ICAPCD employs near real-time notifications through electronic and radio media when air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours. Two electronic sources are utilized the home page for the ICAPCD at www.co.imperial.ca.us and the air quality website www.imperialvalleyair.org. Local radio and newspapers pick up posted and released notices by either site providing local "Public Service Announcements." In addition, the public may opt to utilize smartphone applications, e-mails or text messaging to receive

notifications, alerts or any other educational material. The types of information provided by the ICAPCD include:

- » Dissemination of near real-time air quality information including pollutant concentration levels and meteorology
- » Daily air quality forecast for short term and long term planning
- » Public notifications, advisories, alerts and warnings
- » Public education

Utilizing a variety of brochures, flyers, leaflets, pencil and pen products and other gift type items the ICAPCD continues to provide information and education through participation in school career day for schools, Asthma Coalition programs, the Public Health sponsored "Children's Fair" as well as other environmental group gatherings.

❖ Processes to collect and maintain data pertinent to the event. [***40 CFR 51.930(b)(2)(ii)(C)***]

There are five State and Local Air Monitoring Stations (SLAMS) located in Imperial County. SLAMS sites are regulatory air quality and meteorological monitoring stations maintained and operated as part of the overall air-monitoring network for the State of California. Of the five SLAMS within Imperial County, four stations measure both meteorological and air quality data. These SLAMS are located in Calexico, El Centro, Westmorland, and Niland; the station located in Brawley only measures air quality. All five monitoring sites utilize a Federal Equivalent Method Beta Attenuation Monitor (BAM) 1020 to measure PM_{10}. Other regulatory sites utilized by the ICAPCD include sites within Riverside County and Yuma County.

All collected data undergoes quality assurance and quality control (QA/QC) procedures to assure the most representative data point at any given hour. The US EPA's AQS maintains all regulatory significant data while the California Air Resources Board (CARB) maintains near real-time data as well as regulatory significant data that is easily accessible to any member of the public, educational institution or industry. Finally, the AQI website for Imperial County, www.imperialvalleyair.org utilizes near real-time data from the AirNow website.

In addition to the regulatory monitors, the ICAPCD utilizes non-regulatory PM_{10} sites located around the Salton Sea when analyzing the potential and source of natural events. **Figure 2-1** is a graphical illustration of the sites utilized by the ICAPCD when analyzing the source of a natural event or when analyzing the potential impact resulting from a natural event.

Archived data, including ambient data, meteorological data, images, advisories, and pertinent notices within the ICAPCD central server is backup twice daily. All events are filed by the date of the event.

FIGURE 2-1
MONITORING SITES IN AND AROUND IMPERIAL COUNTY

Fig 2-1: Depicts a select group of PM_{10} monitoring sites in Imperial County, eastern Riverside County, and southwestern Arizona (Yuma County). Generated through Google Earth

❖ Mechanisms to consult with other air quality managers in the affected area regarding the appropriate responses to abate and minimize impacts.
[***40 CFR 51.930(b)(2)(ii)(D)***]

The desert southwest, which includes other planning partners and air districts such as the Arizona Department of Environmental Quality, the South Coast Air Quality Management District and the San Diego Air Pollution Control District all, implement programs that help protect the public from exposure to high concentrations of particulate matter. ICAPCD

staff maintains a subscription to notifications and bulletins from surrounding air agencies, the NWS, Weather Underground and in Mexico, the Servicio Meteorológico Nacional. ICAPCD routinely visits the National Oceanic and Atmospheric Administration (NOAA) for supporting information and evidence of the occurrence or of the potential of an occurrence of a natural event. ICAPCD staff routinely maintains contact and shares information with other air agencies, identified above, the CARB and US EPA.

II.3 Provisions for periodic review and evaluation of the Mitigation Plan and its implementation and effectiveness by the State and all interested stakeholders. [***40 CFR 51.930(b)(2)(iii)***]

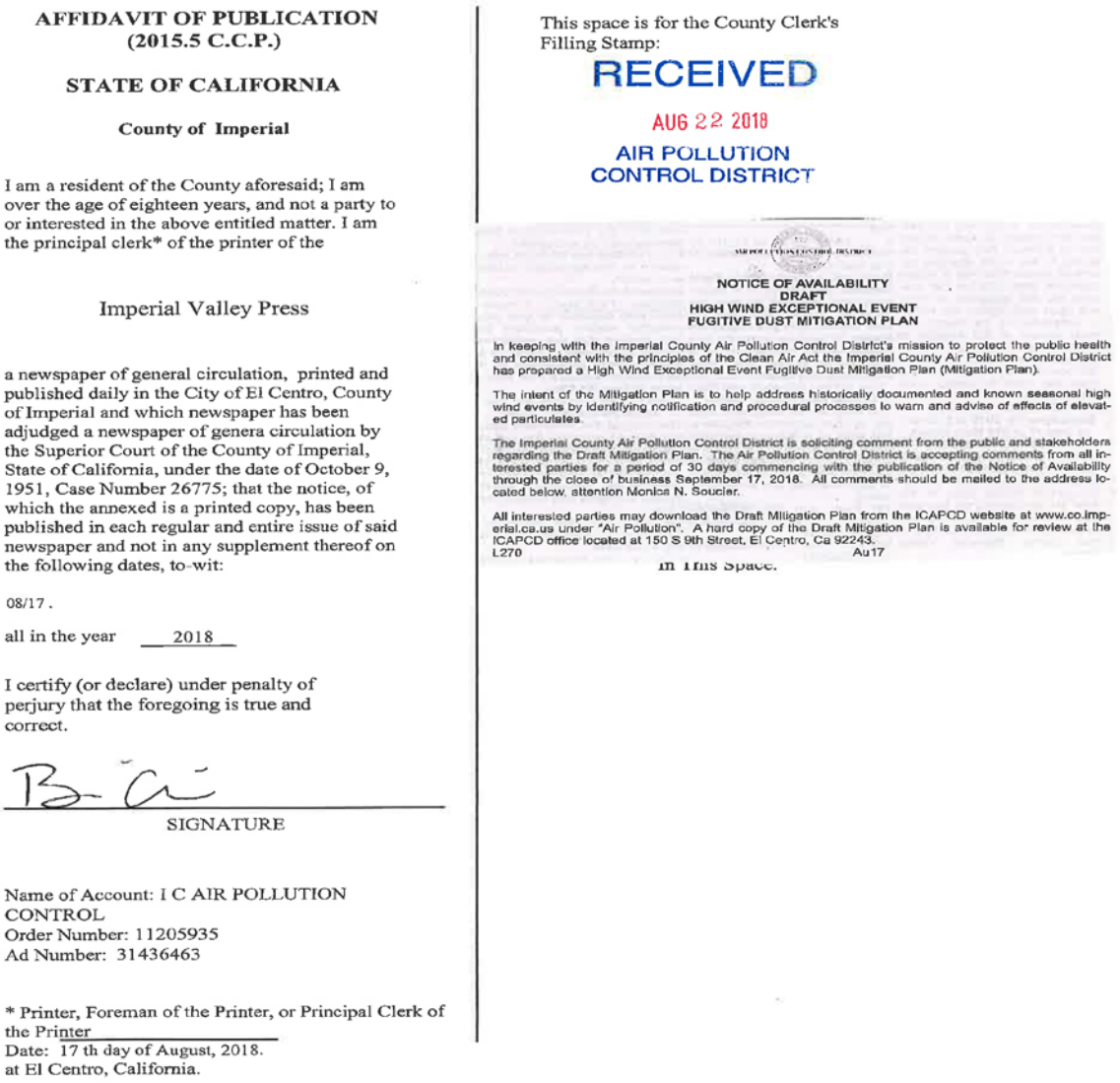
Although the ICAPCD will post the final Mitigation Plan for a 30-day public review, the Mitigation Plan will remain permanently online and will be accessible to the public. The ICAPCD intends to explain and address any comments submitted during the 30-day public review process. Upon submitting the final Mitigation Plan, explanations as to why the air district made or did not make changes to the Mitigation Plan will be included along with the submitted comments. After the submittal of the final Mitigation Plan, the ICAPCD intends to review and evaluate the Mitigation Plan every three years. The ICAPCD will maintain periodic communications with air quality officials and the public to provide an ongoing evaluation of the effectiveness of the Mitigation Plan over a three-year period.

❖ With the submission of the initial Mitigation Plan according to the requirements in paragraph (b)(3) of this section that contains the elements in paragraph (b)(2) of this section, the State must: [***40 CFR 51.930(b)(2)(iii)(A)***]

1 Document that a draft version of the mitigation plan was available for public comment for a minimum of 30 days:

The ICAPCD published its Notice of Availability of the Draft High Wind Exceptional Event Fugitive Dust Mitigation Plan in the Imperial Valley press and on its webpage on August 18, 2018. The public comment period ended September 17, 2018. **Figure 2-2** is a copy of the affidavit attesting to the publication.

FIGURE 2-2
IMPERIAL VALLEY PRESS AFFIDAVIT



AFFIDAVIT OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA

County of Imperial

I am a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk* of the printer of the

Imperial Valley Press

a newspaper of general circulation, printed and published daily in the City of El Centro, County of Imperial and which newspaper has been adjudged a newspaper of genera circulation by the Superior Court of the County of Imperial, State of California, under the date of October 9, 1951, Case Number 26775; that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

08/17 .

all in the year 2018

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

SIGNATURE

Name of Account: I C AIR POLLUTION CONTROL
Order Number: 11205935
Ad Number: 31436463

* Printer, Foreman of the Printer, or Principal Clerk of the Printer
Date: 17 th day of August, 2018.
at El Centro, California.

This space is for the County Clerk's Filling Stamp:

RECEIVED
AUG 22 2018
AIR POLLUTION CONTROL DISTRICT

NOTICE OF AVAILABILITY
DRAFT
HIGH WIND EXCEPTIONAL EVENT
FUGITIVE DUST MITIGATION PLAN

In keeping with the Imperial County Air Pollution Control District's mission to protect the public health and consistent with the principles of the Clean Air Act the Imperial County Air Pollution Control District has prepared a High Wind Exceptional Event Fugitive Dust Mitigation Plan (Mitigation Plan).

The intent of the Mitigation Plan is to help address historically documented and known seasonal high wind events by identifying notification and procedural processes to warn and advise of effects of elevated particulates.

The Imperial County Air Pollution Control District is soliciting comment from the public and stakeholders regarding the Draft Mitigation Plan. The Air Pollution Control District is accepting comments from all interested parties for a period of 30 days commencing with the publication of the Notice of Availability through the close of business September 17, 2018. All comments should be mailed to the address located below, attention Monica N. Soucier.

All interested parties may download the Draft Mitigation Plan from the ICAPCD website at www.co.imperial.ca.us under "Air Pollution". A hard copy of the Draft Mitigation Plan is available for review at the ICAPCD office located at 150 S 9th Street, El Centro, Ca 92243.
L270 Au17

In This Space.

Fig 2-2: Is a copy of the Imperial Valley Press Affidavit attesting to the 30-day publication of the Draft High Wind Exceptional Event Fugitive Dust Mitigation Plan

2 Submit the public comments it received along with its mitigation plan to the Administrator; and

Following the comment period, the ICAPCD received no comments from the public.

3 In its submission to the Administrator, for each public comment received, explain the changes made to the Mitigation Plan or explain why the State did not make any changes to the Mitigation Plan.

Following the comment period, the ICAPCD received no public comments. Changes to the document reflected administrative corrections.

❖ The State shall specify in its Mitigation Plan the periodic review and evaluation process that it intends to follow for reviews following the initial review identified in paragraph (b)(2)(iii)(A) [***40 CFR 51.930(b)(2)(iii)(B)***]

In order to provide the best opportunity for the public, stakeholders and other government agencies to comment on the Final Mitigation Plan the ICAPCD will permanently post the plan online soliciting feedback. Information regarding the review and evaluation will be explained and indicate the three year evaluation process. In the event that PM_{10} rulemaking occurs within the three-year period, updates to the Mitigation Plan will be in accordance with rule revisions. CARB and US EPA shall receive revised copies of the Mitigation Plan.

III Submission of Mitigation Plans [*40 CFR 51.930(b)(3)*]

All states subject to the provisions of paragraph (b)….shall, after notice and opportunity for public comment identified in paragraph (b)(2)(iii)(A)…, submit a Mitigation Plan to the Administrator for review and verification of the plan components identified in paragraph (b)(2)….[***40 CFR 51.930(b)(3)***]

❖ States shall submit their mitigation plans within 2 years of being notified that they are subject to the provisions of paragraph (b) of 40 CFR 51.930. [***40 CFR 51.930(b)(3)(i)***]

The final rule effective date of September 30, 2016 requires the ICAPCD to submit to the US EPA Administrator a final Mitigation Plan by September 30, 2018. The final Mitigation Plan submitted to CARB on September 21, 2018 should be forwarded to the US EPA Administrator by September 30, 2018, which falls within the 2 year required period.

Exceptional Events Mitigation Plan Checklist

Area Subject to Mitigation Requirements in 40 CFR 51.930: **The Imperial Valley PM_{10} Nonattainment Planning Area**

Applicable Pollutant and Event Type: **Particulate Matter Less than 10 Microns (PM_{10})**

Date of Mitigation Document: **September 17, 2018**

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
		51.930(a)	A State requesting to exclude air quality data due to exceptional events must take appropriate and reasonable actions to protect public health from exceedances or violations of the NAAQS. At a minimum, the State must:	The air agency responsibilities described in 51.930(a)(1) – (a)(3) are functionally fulfilled by the mitigation plan requirements and components specified under 51.930(b)(2).	
		51.930(a)(1)	Provide for prompt public notification whenever air quality concentrations exceed or are expected to exceed an applicable ambient air quality standard;	See above – 51.930(a).	
		51.930(a)(2)	Provide for public education concerning actions that individuals may take to reduce exposures to unhealthy levels of air quality during and following an exceptional event; and	See above – 51.930(a).	
		51.930(a)(3)	Provide for the implementation of appropriate measures to protect public health from exceedances or violations of ambient air quality standards caused by exceptional events.	See above – 51.930(a).	
		51.930(b)	Development of mitigation plans for areas with historically documented or known seasonal events.	EPA responsibility.	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
		51.930(b)(1)	*Generally*. All States having areas with historically documented or known seasonal events shall be required to develop a mitigation plan with the components identified in 51.930(b)(2) and submit such plan to the Administrator according to the requirements in 51.930(b)(3).	EPA responsibility (identification of areas).	
		51.930(b)(1)(i)	For purposes of the requirements set forth in 51.930, historically documented or known seasonal events shall include those events of the same type and pollutant that recur in a 3-year period and meet any of the following:	EPA responsibility.	
		51.930(b)(1)(i)(A)	Three events or event seasons for which a State submits a demonstration under the provisions of 40 CFR 50.14 in a 3-year period; or	EPA responsibility.	
		51.930(b)(1)(i)(B)	Three events or event seasons that are the subject of an initial notification of a potential exceptional event as defined in 40 CFR 50.14(c)(2) in a 3-year period regardless of whether the State submits a demonstration under the provisions of 40 CFR 50.14.	EPA responsibility.	
		51.930(b)(1)(ii)	The Administrator will provide written notification to States that they are subject to the requirements in 51.930(b) when the Administrator becomes aware of applicability.	EPA responsibility.	
	10	51.930(b)(2)	*Plan components.* At a minimum, each mitigation plan…shall contain provisions for the following:	State/local/tribal air agency responsibility.	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
	10	51.930(b)(2)(i)	Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours.	State/local/tribal air agency responsibility.	
	12	51.930(b)(2)(ii)	Steps to identify, study and implement mitigating measures, including approaches to address each of the following:	State/local/tribal air agency responsibility.	
	12	51.930(b)(2)(ii)(A)	Measures to abate or minimize contributing controllable sources of identified pollutants.	State/local/tribal air agency responsibility.	
	14	51.930(b)(2)(ii)(B)	Methods to minimize public exposure to high concentrations of identified pollutants.	State/local/tribal air agency responsibility.	
	15	51.930(b)(2)(ii)(C)	Processes to collect and maintain data pertinent to the event.	State/local/tribal air agency responsibility.	
	16	51.930(b)(2)(ii)(D)	Mechanisms to consult with other air quality managers in the affected area regarding the appropriate responses to abate and minimize impacts.	State/local/tribal air agency responsibility.	
	17	51.930(b)(2)(iii)	Provisions for periodic review and evaluation of the mitigation plan and its implementation and effectiveness by the State & interested stakeholders.	State/local/tribal air agency responsibility.	
	17	51.930(b)(2)(iii)(A)	With the submission of the initial mitigation plan according to the requirements in 51.930(b)(3) that contains the elements in 51.930(b)(2), the State must:	State/local/tribal air agency responsibility.	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
	17	51.930(b)(2)(iii)(A)(*1*)	Document that a draft version of the mitigation plan was available for public comment for a minimum of 30 days;	State/local/tribal air agency responsibility.	
	18	51.930(b)(2)(iii)(A)(*2*)	Submit the public comments received along with its mitigation plan to the Administrator; and	State/local/tribal air agency responsibility.	
	19	51.930(b)(2)(iii)(A)(*3*)	In its submission to the Administrator, for each public comment received, explain the changes made to the mitigation plan or explain why the State did not make any changes to the mitigation plan.	State/local/tribal air agency responsibility.	
	19	51.930(b)(2)(iii)(B)	The State shall specify in its mitigation plan the periodic review and evaluation process that it intends to follow for reviews following the initial review identified in 51.930(b)(2)(iii)(A).	State/local/tribal air agency responsibility.	
	19	51.930(b)(3)	*Submission of mitigation plans.* All States subject to the provisions of 51.930(b) shall, after notice and opportunity for public comment identified in 51.930(b)(2)(iii)(A), submit a mitigation plan to the Administrator for review and verification of the plan components identified in 51.930(b)(2).	This provision is also described in section 51.930(b)(2)(iii)(A)(1).	
	19	51.930(b)(3)(i)	States shall submit their mitigation plans within 2 years of being notified they are subject to 51.930(b).	State/local/tribal air agency responsibility.	
		51.930(b)(3)(ii)	The Administrator shall review each mitigation plan developed according to the requirements in paragraph (b)(2) of this section and shall notify the submitting State upon completion of such review.	EPA responsibility.	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
		50.14(b)(9)	Mitigation plans.	EPA responsibility.	
		50.14(b)(9)(i)	Except as provided for in 50.14(b)(9)(ii), where a State is subject to the requirements of 40 CFR 51.930(b), the Administrator shall not place a concurrence flag in the appropriate field for the data record in the AQS database, as specified in 50.14(c)(2)(ii), if the data are of the type and pollutant that are the focus of the mitigation plan until the State fulfills its obligations under the requirements of 40 CFR 51.930(b). The Administrator may nonconcur or defer action on such a demonstration.	EPA responsibility.	
		50.14(b)(9)(ii)	The prohibition on placing a concurrence flag in the appropriate field for the data record in the AQS database by the Administrator stated in 50.14(b)(9(i) does not apply to data that are included in an exceptional events demonstration that is:	EPA responsibility.	
		50.14(b)(9)(ii)(A)	Submitted in accordance with 50.14(c)(3) that is also of the type and pollutant that is the focus of the mitigation plan; and	EPA responsibility.	
	19	50.14(b)(9)(ii)(B)	Submitted within 2-year period allowed for mitigation plan development specified in 51.930(b)(3).	This provision is also described in section 51.930(b)(3)(i).	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

DEC 0 4 2018

Dr. Michael Benjamin
Chief, Air Quality Planning and Science Division
California Air Resources Board
P.O Box 2815
Sacramento, CA 95812

Dear Dr. Benjamin:

Thank you for the California Air Resources Board's (CARB's) exceptional events mitigation plans submitted October 10, 2018. EPA reviewed the mitigation plans and determined that they are complete.

Section 319(b) of the Clean Air Act (CAA) authorizes EPA to consider air agency requests to exclude air quality monitoring data that is directly due to exceptional events from use in determinations by the Administrator with respect to exceedances or violations of the NAAQS. All States having areas with historically documented or known seasonal events shall be required to develop an exceptional events mitigation plan with the components identified in paragraph 40 CFR 51.930(b)(2), and to submit the mitigation plan to EPA in accordance with 40 CFR 51.930(b)(3). EPA identified Coso Junction, CA PM_{10} Nonattainment Area as subject to the mitigation requirements for PM_{10} due to high wind dust, Imperial Valley, CA PM_{10} Nonattainment Area as subject to the mitigation requirements for PM_{10} due to high wind dust, Sacramento $PM_{2.5}$ Nonattainment Area as subject to the mitigation requirements for $PM_{2.5}$ due to wildfires, and Coachella Valley, CA and Los Angeles South Coast Air Basin, CA PM_{10} Nonattainment Areas as subject to the mitigation requirements for PM_{10} due to high wind dust. *See Treatment of Data Influenced by Exceptional Events*, 81 Fed. Reg. 68216, 68272-73 (Oct. 3, 2016). EPA acknowledges that CARB submitted these mitigation plans in accordance with 40 CFR 51.930. We determined that the mitigation plans are complete, and are providing CARB notice pursuant to 40 CFR 51.930(b)(3)(ii). Enclosed are the checklists EPA used to review your plans.

We appreciate CARB and the Districts' efforts to develop these mitigation plans, and look forward to continued engagement on exceptional events. If you have any questions regarding this letter or related matters, please feel free to contact Gwen Yoshimura at (415) 947-4134 or Dena Vallano at (415) 972-3134 at any time.

Sincerely,

for Elizabeth J. Adams
Director, Air Division

Enclosures: Exceptional Event Mitigation Plan Checklists for Coso Junction PM_{10}, Imperial Valley PM_{10}, Sacramento $PM_{2.5}$, and Coachella Valley and Los Angeles South Coast Air Basin PM_{10}.

cc (via email): Webster Tasat, CARB
Theresa Najita, CARB
Dave Johnston, El Dorado County Air Quality Management District
Phillip Kiddo, Great Basin Unified Air Pollution Control District
Matt Dessert, Imperial County Air Pollution Control District
Erik White, Placer County Air Pollution Control District
Alberto Ayala, Sacramento Metro Air Quality Management District
Wayne Nastri, South Coast Air Quality Management District
Mat Ehrhardt, Yolo-Solono Air Quality Management District

Exceptional Events Mitigation Plan Checklist

Area Subject to Mitigation Requirements in 40 CFR 51.930: __Imperial Valley PM_{10} Nonattainment Area_____

Applicable Pollutant and Event Type: __PM_{10} High Wind Dust_____

Date Submitted: __October 10, 2018_____

Data of EPA Review: __November 28, 2018_____

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
Yes	See elements below	51.930(a)	A State requesting to exclude air quality data due to exceptional events must take appropriate and reasonable actions to protect public health from exceedances or violations of the NAAQS. At a minimum, the State must:	The air agency responsibilities described in 51.930(a)(1) – (a)(3) are functionally fulfilled by the mitigation plan requirements and components specified under 51.930(b)(2).	
Yes	See elements below	51.930(a)(1)	Provide for prompt public notification whenever air quality concentrations exceed or are expected to exceed an applicable ambient air quality standard;	See above – 51.930(a).	
Yes	See elements below	51.930(a)(2)	Provide for public education concerning actions that individuals may take to reduce exposures to unhealthy levels of air quality during and following an exceptional event; and	See above – 51.930(a).	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
Yes	See elements below	51.930(a)(3)	Provide for the implementation of appropriate measures to protect public health from exceedances or violations of ambient air quality standards caused by exceptional events.	See above – 51.930(a).	
Yes	See elements below	51.930(b)(2)	*Plan components.* At a minimum, each mitigation plan…shall contain provisions for the following:	State/local/tribal air agency responsibility.	
Yes	p. 10 - 12	51.930(b)(2)(i)	Public notification to and education programs for affected or potentially affected communities. Such notification and education programs shall apply whenever air quality concentrations exceed or are expected to exceed a NAAQS with an averaging time that is less than or equal to 24-hours.	State/local/tribal air agency responsibility.	
Yes	See elements below	51.930(b)(2)(ii)	Steps to identify, study and implement mitigating measures, including approaches to address each of the following:	State/local/tribal air agency responsibility.	
Yes	p. 12 - 14	51.930(b)(2)(ii)(A)	Measures to abate or minimize contributing controllable sources of identified pollutants.	State/local/tribal air agency responsibility.	
Yes	p. 14 - 15	51.930(b)(2)(ii)(B)	Methods to minimize public exposure to high concentrations of identified pollutants.	State/local/tribal air agency responsibility.	
Yes	p. 15 - 16	51.930(b)(2)(ii)(C)	Processes to collect and maintain data pertinent to the event.	State/local/tribal air agency responsibility.	
Yes	p. 16 - 17	51.930(b)(2)(ii)(D)	Mechanisms to consult with other air quality managers in the affected area regarding the appropriate responses to abate and minimize impacts.	State/local/tribal air agency responsibility.	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
Yes	See elements below	51.930(b)(2)(iii)	Provisions for periodic review and evaluation of the mitigation plan and its implementation and effectiveness by the State & interested stakeholders.	State/local/tribal air agency responsibility.	
Yes	See elements below	51.930(b)(2)(iii)(A)	With the submission of the initial mitigation plan according to the requirements in 51.930(b)(3) that contains the elements in 51.930(b)(2), the State must:	State/local/tribal air agency responsibility.	
Yes	p. 17 - 19	51.930(b)(2)(iii)(A)(*1*)	Document that a draft version of the mitigation plan was available for public comment for a minimum of 30 days;	State/local/tribal air agency responsibility.	
Yes	n/a	51.930(b)(2)(iii)(A)(*2*)	Submit the public comments received along with its mitigation plan to the Administrator; and	State/local/tribal air agency responsibility.	No comments received
Yes	n/a	51.930(b)(2)(iii)(A)(*3*)	In its submission to the Administrator, for each public comment received, explain the changes made to the mitigation plan or explain why the State did not make any changes to the mitigation plan.	State/local/tribal air agency responsibility.	No comments received
Yes	p. 19	51.930(b)(2)(iii)(B)	The State shall specify in its mitigation plan the periodic review and evaluation process that it intends to follow for reviews following the initial review identified in 51.930(b)(2)(iii)(A).	State/local/tribal air agency responsibility.	

Element Addressed	Plan Page Number	40 CFR 51.930 Mitigation of Exceptional Events Regulatory Citation		User Notes	EPA Review Notes
Yes	Cover Letter	51.930(b)(3)	*Submission of mitigation plans.* All States subject to the provisions of 51.930(b) shall, after notice and opportunity for public comment identified in 51.930(b)(2)(iii)(A), submit a mitigation plan to the Administrator for review and verification of the plan components identified in 51.930(b)(2).	This provision is also described in section 51.930(b)(2)(iii)(A)(1).	
Yes	Cover Letter	51.930(b)(3)(i)	States shall submit their mitigation plans within 2 years of being notified they are subject to 51.930(b).	State/local/tribal air agency responsibility.	