



2021 Annual Report Permitting, Policy, and Enforcement Review

The goal of CARB's Review of Imperial County Air Pollution Control District is to ensure that emission sources within the District demonstrate complete compliance with air pollution control related requirements. The District enforcement program has a strong foundation. The District's four compliance inspectors typically inspect all of the 700-800 District issued permits at least once per year. Facilities with federal "Title V" permits and which qualify as synthetic minor facilities are inspected twice each year. District staff issues notices of violation (NOV) and notices to comply (NTC) whenever a violation of a permit, regulation, or statute is identified.

Permitting Summary

As part of CARB's Enforcement Review, CARB and the District identified 22 facilities to review permits and their conditions with the District. The permits covered a wide range of facility types, including geothermal, agriculture, asphalt and aggregate, gasoline distribution and dispensing, food processing, and coatings. The permit reviews focused on the following elements: Clear and Descriptive Language, Operational Parameters, Referencing External Certifications and Protocols, and Self-Inspection, Maintenance, and Recordkeeping.

During 2021, the permit review process between CARB and the District was initiated. All 22 facility permits, previously mentioned, were revised by District staff and submitted to CARB for further review. In this review, one "Title V" facility permit was revised. In addition, the District began reviewing permits within the AB 617 Calexico-Heber-El Centro Corridor with the intention to eventually revise all approximately 250 permits within the AB 617 Corridor. Finally, District staff from the Permitting Division participated in a series of workshops hosted by CARB from January 2021 through March 2021. The workshops provided tools and resources in writing effective permits.

Policy Summary

In addition to permit updates, the District began presenting new and modified policies during AB 617 Corridor Steering Committee meetings to hear comments from businesses and community members. After discussions and comprehensive reviews, the District posted updated policies on the website. Policies can be found under "Rules and Regulations" section of the website. (<https://apcd.imperialcounty.org/rules-and-regulations/>).

The following policies were presented during the 2021 calendar year:



Policies Presented to AB 617 Steering Committee January 2021 - December 2021		
Policy Number	Policy Name	Date Presented
17	Guidelines for Staff Processing and Investigation of Complaints	6/16/2021

Enforcement Summary

Finally, there were a total of 694 inspections conducted by District Staff of permitted sources in 2021, out of a maximum possible number of 746 inspections. The District received 110 complaints in 2021, and issued a total of 164 Notices to Comply (NTCs) and 122 Notices of Violation (NOVs). The majority of the aforementioned NTCs and NOVs were fully resolved between the District and violators. The non-compliance rate of permitted facilities in 2021 was 9.65%.

The table below summarizes enforcement activities in the District and AB 617 Calexico-Heber-El Centro Corridor, and District-Wide, during the 2021 calendar year:

Enforcement Statistics January 2021 - December 2021		
	AB 617 Corridor	District-Wide
Total Permitted Sources	256	746
Total Inspections Conducted on Permitted Sources	256	694
Notice to Comply (NTC)	61	164
Notice of Violation (NOV)	35	122
Complaints	45	110
Non-Compliance Rate	13.67%	9.65%