



2023

Annual Review: Permitting, Policy, and Enforcement





Overview

The goal of Imperial County Air Pollution Control District’s Annual review is to track measureable increments of progress from the Compliance Division and Permitting Division. Currently, the District’s compliance program has a strong foundation. The District’s four compliance inspectors and specialist visit 750 to 850 District issued permits at least once per year. In addition, the inspectors visit eight Title V facilities and nine synthetic minor sources at least twice per year. The District’s compliance staff responds to air quality complaints submitted by the public, and typically investigates the alleged emission source or activity within 24 hours of receipt of the complaint. The District’s compliance staff will issue Notices of Violations (NOV) and Notices to Comply (NTC) whenever a violation of a permit, regulation, or statute is identified.

The District’s two permitting engineers process permit applications, and work with applicants to gather the new or modified emission source’s specifications. The permitting staff reviews existing permitted equipment for their potential to emit and reviews permit’s conditions to ensure they meet current air quality standards and regulations. The District’s permitting staff maintains emission inventories for actively permitted sources, and reports this data to California Air Resources Board.





Permitting Summary

In 2023, the District’s Permitting Division continued to enhance conditions for Permits to Operate within the AB 617 Calexico-Heber-El Centro Corridor. In 2023, approximately 92% of the 262 permitted sources in this Corridor received revised conditions. The revisions focused on the following elements: Clear and Descriptive Language, Operational Parameters, Referencing External Certifications and Protocols, and Self-Inspection, Maintenance, and Recordkeeping. The permits in the Corridor cover a wide range of facility types, including geothermal, agriculture, asphalt and aggregate, gasoline distribution and dispensing, food processing, and coatings.



Policy Summary

In 2023, the District’s Compliance Division hosted two public workshops on policies related to open burning and agricultural burning. The online workshops were hosted on January 11, 2023, and January 18, 2023, and are available online on the District’s website and YouTube channel. The Compliance Division attended several local community events, as well as local industry meetings (Imperial County Farm Bureau), to present information on policies related to open burning and agricultural burning.

The previous year, the District’s Compliance Division presented new and modified policies at the AB 617 Community Steering Committee (CSC) meetings for El Centro-Heber-Calexico. Ten policies were presented to the CSC, which encompassed topics such as “Safety While Conducting Inspections”, “Notices to Comply”, and “Permit Application Guidelines for Applicants”. During the community meetings, the members and public were able to provide feedback. After discussions and comprehensive staff reviews, the District posted updated policies on the main website. The current policies can be found under the “Rules and Regulations” section of the website. (<https://apcd.imperialcounty.org/rules-and-regulations/>).



Enforcement Summary

2023 Enforcement Statistics District-Wide & Within AB 617 Corridor		
	Imperial County District-Wide	AB 617 Corridor (El Centro-Heber-Calexico)
Total Permitted Sources	773	262
Total Inspections Conducted	810	278
Notice of Violation (NOV)	163	61
Notice to Comply (NTC)	91	42
Non-Compliance Rate	12.81%	14.50%
Complaints	99	36

Permit Inspections

- In 2023, the District’s Enforcement Division completed 810 inspections of the 773 active permitted sources. Title V facilities and synthetic minor sources are inspected semi-annually. Two (2) permitted sources did not receive inspections due to scheduling conflicts or changes with the permit’s responsible agent.

Enforcement Action

- In 2023, the District’s Enforcement Division issued 91 Notices to Comply (NTC’s) and 163 Notices of Violation (NOV’s).
- The District’s Enforcement Division has resolved ninety-two percent (92%) of violations issued in 2023 as of this report’s publication. None of the unresolved violations are undergoing litigation with Imperial County’s counsel.
- In 2023, the non-compliance rate for permitted facilities was 12.81%.
- In 2023, the total monetary value of penalties collected was \$332,250.

Complaints

- In 2023, the District’s Enforcement Division received 99 complaints.
- All complaints submitted to the District received a response within 24 hours of submission with a physical inspection and/or a phone call to the source and the reporting party.
- There were three (3) Notice of Violation(s) issued as a result of complaints submitted, and three (3) Notice to Comply(s) issued as a result of complaints submitted.