



2024

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 investigating air quality impacts from permitted sources and non-permitted sources. The District’s four compliance inspectors, three permitting engineers, and one air pollution specialist visit approximately 830 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 three 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 engineers maintain emission inventories for actively permitted sources, and submits this data to U.S EPA and California Air Resources Board.





Permitting Summary

All permits are reviewed annually during the annual inspection conducted by the compliance inspector. If necessary, the permits are forwarded to the Permitting Division for revisions to the operating conditions. In some instances, permits are revised during a permit amendment application or an update to the District's Regulations, State Regulations, or US EPA Promulgations.

In 2024, the District's permitting staff continued enhancing conditions in Permits to Operate, and staff focused on California Assembly Bill 2588 Air Toxics "Hot Spots Program". The Program established a process to compile an inventory of toxic air contaminants from specific facilities, and to assess the potential risks to human health. Assembly Bill 2588 specifies actions for the California Air Resources Board, Office of Environmental Health Hazard Assessment, and local air quality districts to carry out to implement the Hot Spots Program.



Through the Program, facilities are categorized based on a reporting status. Once categorized, the District can develop a numerical prioritization score for the facility based on magnitude of facility-wide emissions, toxic potency of emitted compounds (cancerous vs. non-cancerous), and distance from emission points to the nearest receptor (i.e., locations where the public lives, works, or spends time). Subsequently, the District may require facilities to file a facility-wide emission inventory report, and a health risk assessment as part of a comprehensive review of the Permit to Operate.

Presentations on this Program were given to Imperial County APCD's Governing Board in El Centro, CA, on January 7, 2025, to the Assembly Bill 617 Community Steering Committee North End (Brawley-Westmorland-Calipatria) in Calipatria, CA, on February 24, 2025, and to the Assembly Bill 617 Community Steering Committee South End (Calexico-Heber-El Centro) via Zoom on March 12, 2025.



Policy Summary

The District has committed to revising policies and procedures for air quality investigations, administrative procedures, and various reporting requirements. The District has committed to publishing the Policies and Procedures on the main website on the Rules and Regulations tab.

Since 2021, the District has revised and published the twenty-two (22) policies below:

Imperial County Air Pollution Control District Policies and Procedures		
Policy Number	Policy Name	Revision Date
3	Procedures for Asbestos Demolition/Renovation Notification	September 12, 2022
5	Off-Site Mitigation	November 17, 2022
8	Designation of Restricted Burn Areas	September 12, 2022
10	Staff Support for Hearing Board	September 6, 2022
15	Burning of Residential Green Waste	May 10, 2023
16	Inspection Procedures and Guidelines	February 23, 2023
16A	Approval, Observation, and Evaluation of Source Tests	February 23, 2023
17	Guidelines for Processing & Investigating Complaints	July 1, 2021
18	Notice of Violation Issuance and Follow Up	November 6, 2023
19	Notice of Violation Reports	November 6, 2023
20	Evidence and Chain of Custody	June 7, 2022
23	Safety While Conducting Inspections	May 27, 2021
24	Access to Facilities	September 6, 2022
26	The Unannounced Inspection(s)	September 6, 2022
28	Notice to Comply - Administration	September 6, 2022
33	Sampling Procedures for Livestock Feed Yards	June 7, 2022
35	Clean Air Fund	June 7, 2022
36	CEQA Air Quality Handbook	June 7, 2022
37	Good Neighbor Policy - Agricultural Burning Notification	June 7, 2022
38	Mitigation Measures for Large Confined Animal Facilities	June 7, 2022
39	Settlement Guidelines for Notice of Violation(s)	June 7, 2022
40	Establishment of NOx Emissions on Engine(s)	June 7, 2022



Enforcement Summary

2024 Enforcement Statistics District-Wide & AB 617 South Corridor		
	Imperial County District-Wide	AB 617 South Corridor (El Centro-Heber-Calexico)
Total Permitted Sources	834	283
Total Inspections Conducted	905	296
Notice of Violation (NOV)	149	56
Notice to Comply (NTC)	136	65
Non-Compliance Rate	12.47%	15.90%
Complaints	96	36

Permit Inspections

- In 2024, the District completed 905 inspections of the 834 active permitted sources. Title V facilities and synthetic minor sources were inspected semi-annually. Various sources were inspected for emission source testing. All permitted sources received an inspection, with the exception of portable sources not operating in Imperial County during the calendar year.

Enforcement Action

- In 2024, the District’s Enforcement Division issued 136 Notices to Comply (NTC’s) and 149 Notices of Violation (NOV’s).
- The District’s Enforcement Division has resolved ninety-seven percent (97%) of violations issued in 2024 as of this report’s publication.
- In 2024, the non-compliance rate for permitted facilities was 12.47%.
- In 2024, the total monetary value of penalties collected was \$121,300.

Complaints

- In 2024, the District’s Enforcement Division received 96 air quality 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. All complaints were investigated, and the results of each investigation were shared with the reporting party if they provided their contact information to the District.
- There were nine (9) Notices of Violation issued as a result of complaints submitted, and two (2) Notices to Comply issued as a result of complaints submitted.