



2025

# Annual Enforcement Review





**IMPERIAL COUNTY  
AIR POLLUTION CONTROL DISTRICT**

**2025 Annual Enforcement Review**

March 23, 2026

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## **I. Enforcement and Permitting Overview**

The goal of Imperial County Air Pollution Control District's Annual Review is to track measurable 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 805 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 pertinent data to U.S EPA and California Air Resources Board.



**II. Permits Summary**

In 2025, the Imperial County Air Pollution Control District permitting engineers continued the enhancement of operating conditions listed on Permits to Operate to include clear and descriptive language, operational parameters, referencing external certifications, and requirements for self-inspections, maintenance, and recordkeeping. Here are specific examples of permit enhancements for air pollution control permits issued in Imperial County:

**Permit Facility Type: Paint Booth and Spray Application**

- A magnahelic differential pressure gauge, or a manometer, must be installed for the spray booth. The gauge, or manometer, shall be kept in operating conditions per the manufacturer’s specifications. On days of operation, the permittee shall maintain a daily log indicate the pressure gauge reading, and corrective actions taken to improve air flow.



**Permit Facility Type: Retail Gasoline Service Station**

- The facility shall keep records of alarms detected by the In-Station Diagnostics System (typically Veeder Root TLS-350 or INCON TS-EMS). The records shall include information such as alarm date, nature of the alarm, repair completed, Certified Technician conducting the repair, and tests performed to validate the repair.



In 2025, the District’s permitting engineers prioritized the comprehensive review of federal Title V Permits issued for facilities in Imperial County. The comprehensive reviews include conducting facility wide inspections with compliance inspectors and facility representatives. During the Title V permit reissuance period, permitting engineers meet on-site with the facility operators, engineers, and management to ensure the Title V Permit operating conditions are clear, descriptive, and limited with redundancy to ensure the Title V source maintains full compliance with the local District’s Regulations, State Regulations, and US EPA Promulgations.

Finally, in 2025 a new Assembly Bill 617 Community was established in the Imperial County – North Imperial Phase I. This AB 617 Community encompasses the cities of Brawley, Westmorland, and Calipatria, and is intended to protect public health by reducing exposure to air pollution in communities disproportionately affected by harmful emissions. The permitting engineers began the review process for permits issued within this new AB 617 Community to ensure permits meet the objectives of the District’s permitting program. The permitting engineers regularly attend the monthly AB 617 meetings to hear comments from community members, and to provide progress reports to industry and community members on their efforts to create enforceable and comprehensive permits.

### III. Policies Summary

The Imperial County Air Pollution Control District is committed to continuous improvement of the District’s Policies and Procedures and committed to a dedicated effort among all staff members in implementing the Policies and Procedures. Since 2021, the District has revised over twenty (20) policies. The revised and enhanced policies include procedures for investigating air quality complaints, procedures for processing permit applications, and procedures for settling violation.

In an effort to maintain full transparency, the District publishes all Policies and Procedures on the District’s main website under the Rules and Regulations section. In addition, the District staff members regularly present the policies at conferences, industry workgroups, and community meetings.



## IV. Enforcement Summary

In 2025, the Imperial County Air Pollution Control District compliance inspectors and air pollution specialist continued the commitment of enforcing air quality regulations. Exhibit 1 provides a summary of enforcement efforts for the current year and Exhibit 2 provides a retrospective summary of enforcement in the entire District and in each of the AB 617 Communities.

### Exhibit 1

#### ***Permit Inspections***

- In 2025, the District completed 899 inspections of the 806 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 2025, the District's Enforcement Division issued 61 Notices to Comply (NTC's) and 112 Notices of Violation (NOV's).
- The District's Enforcement Division has resolved ninety-five percent (95%) of violations issued in 2025 as of this report's publication.
- In 2025, the non-compliance rate for permitted facilities was 8.56%.
- In 2025, the total monetary value of penalties collected was \$185,025.

#### ***Complaints***

- In 2025, the District's Enforcement Division received 82 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 four (4) Notices of Violation issued as a result of complaints submitted, and five (5) Notices to Comply issued as a result of complaints submitted.

**Exhibit 2**

<b>2025 Enforcement Statistics</b>			
<b>Imperial County District Wide &amp; AB 617 Communities</b>			
	<b>Imperial County District-Wide</b>	<b>AB 617 South Corridor (El Centro-Heber-Calexico)</b>	<b>AB 617 North Corridor (Brawley-Westmorland-Calipatria)</b>
<b>Total Permitted Sources</b>	806	272	133
<b>Total Inspections</b>	899	293	154
<b>Notices of Violation (NOV)</b>	112	47	21
<b>Notices to Comply (NTC)</b>	61	33	13
<b>Non-Compliance Rate</b>	8.56%	10.66%	9.02%
<b>Complaints</b>	82	32	15

<b>2024 Enforcement Statistics</b>			
<b>Imperial County District Wide &amp; AB 617 Communities</b>			
	<b>Imperial County District-Wide</b>	<b>AB 617 South Corridor (El Centro-Heber-Calexico)</b>	<b>*AB 617 North Corridor (Brawley-Westmorland-Calipatria)</b>
<b>Total Permitted Sources</b>	834	283	-
<b>Total Inspections</b>	905	296	-
<b>Notices of Violation (NOV)</b>	149	56	-
<b>Notices to Comply (NTC)</b>	136	65	-
<b>Non-Compliance Rate</b>	12.47%	15.90%	-
<b>Complaints</b>	96	36	-

\* AB 617 North Corridor was formally approved by the California Air Resources Board (CARB) in June 2025.