



July 11, 2017

Richard Corey  
Executive Officer  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

**Re: Imperial County 2013 24-Hour PM<sub>2.5</sub> SIP Withdrawal Request**

Dear Mr. Corey:

On December 2, 2014, the Imperial County Air Pollution Control Board of Directors adopted the Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM<sub>2.5</sub> Moderate Nonattainment Area (2013 24-Hour PM<sub>2.5</sub> SIP). The 2013 24-Hour PM<sub>2.5</sub> SIP provides technical documentation that in 2012 the Imperial County Nonattainment Area attained the 2006 PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS) of 35 µg/m<sup>3</sup> but for emissions emanating from Mexicali, Mexico. This attainment demonstration was based on PM<sub>2.5</sub> monitoring data for 2010 through 2012. After adoption, the 2013 24-Hour PM<sub>2.5</sub> SIP was remitted to the California Air Resources Board for the state's board adoption and ultimately submitted to the U.S. Environmental Protection Agency (U.S. EPA) on January 9, 2015.

On March 13, 2017, the U.S. EPA made a determination that the Imperial County Nonattainment Area had attained the 2006 24-hour PM<sub>2.5</sub> NAAQS based on 2013-2015 ambient air quality data. As provided in 40 CFR 51.1015, this clean data determination suspends the requirement to submit an attainment demonstration for this area, which consists of RACM, RACT, RFP plan, contingency measures, and any other planning SIP revisions related to the attainment of the 2006 24-hour PM<sub>2.5</sub> NAAQS, so long as this area continues to meet the 24-hour PM<sub>2.5</sub> standard. The U.S. EPA also approved the 2013 24-Hour PM<sub>2.5</sub> SIP's annual average and winter daily average inventories for 2008 as meeting the requirements of CAA Section 172(c)(3).

On May 10, 2017, the U.S. EPA made a final determination that the Imperial County Nonattainment Area attained the 2006 PM<sub>2.5</sub> NAAQS on December 31, 2015 based on complete quality assured and certified PM<sub>2.5</sub> monitoring data recorded from 2013 through 2015.

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Due to the Imperial County Nonattainment Area attaining the 2006 24-hour PM<sub>2.5</sub> NAAQS, the Air District is requesting that CARB withdraw the January 9, 2015 submittal of the 2013 24-Hour PM<sub>2.5</sub> SIP with the exception of the annual average and winter daily average inventories included in Chapter 3, Emissions Inventory.

If you have any questions, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink that reads "Matt Dessert". The signature is written in a cursive, flowing style.

Matt Dessert,  
Air Pollution Control Officer  
IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT

cc: Imperial County Air Pollution Control District Board of Directors  
Ralph Cordova, Jr., County Executive Officer  
Reyes Romero, Assistant Air Pollution Control Officer