

May 9, 2019

Submitted Electronically

Mr. Mike Stoker
Regional Administrator
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Stoker:

The California Air Resources Board (CARB) is submitting to the United States Environmental Protection Agency (U.S. EPA) the San Joaquin Valley (Valley) *2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards* (2018 Plan) and the *2016 Moderate Area Plan for the 2012 PM_{2.5} Standard* (2016 Moderate Plan) as revisions to the California State Implementation Plan (SIP).

Together, the 2018 Plan and the 2016 Moderate Plan meet Clean Air Act requirements for four fine particulate matter (PM_{2.5}) national ambient air quality standards (standards) in the Valley. The 2018 Plan demonstrates that the Valley will attain each of the four standards by the applicable Serious area deadlines. The 2016 Moderate Plan is the required prerequisite to the 2018 Plan that demonstrates that attainment of the 12 microgram per cubic meter (µg/m³) annual standard is impracticable by the Moderate area deadline and requests that the Valley be reclassified as a Serious nonattainment area.

The San Joaquin Valley Air Pollution Control District (District) Board adopted the 2016 Moderate Plan on September 15, 2016, and the 2018 Plan on November 15, 2018. CARB adopted both SIPs on January 24, 2019.

This submittal consists of electronic copies of the following materials:

1. 2018 Plan;
2. 2016 Moderate Plan;
3. CARB SIP Completeness Checklists for:
 - a. The 2018 Plan;
 - b. The 2016 Moderate Plan;

4. CARB Resolution 19-1 adopting the 2018 Plan and 2016 Moderate Plan as revisions to the California SIP;
5. Public notice for the CARB January 24, 2019, public meeting to consider approval of the 2018 Plan and 2016 Moderate Plan;
6. Transcript for the CARB January 24, 2019, public meeting to consider approval of the 2018 Plan and 2016 Moderate Plan;
7. Comments log and written comments regarding the 2018 Plan and 2016 Moderate Plan received by CARB for the January 24, 2019, public meeting;
8. District submittal for the 2018 Plan, including:
 - a. Public notice evidence for the District November 15, 2018, public meeting to consider approval of the 2018 Plan;
 - b. District Resolution 18-11-16 adopting the 2018 Plan;
 - c. Letter from the District to CARB transmitting the 2018 Plan to CARB for submittal to U.S. EPA as a revision to the California SIP; and
9. District submittal for the 2016 Moderate Plan, including:
 - a. Public notice evidence for the District September 15, 2016, public meeting to consider approval of the 2016 Moderate Plan;
 - b. District Resolution 16-9-10 adopting the 2016 Moderate Plan;
 - c. Letter from the District to CARB transmitting the 2016 Moderate Plan to CARB for submittal to U.S. EPA as a revision to the California SIP.

At its October 25, 2018, meeting CARB adopted the *San Joaquin Valley Supplement to the 2016 State Strategy for the State Implementation Plan* (Valley State SIP Strategy). The Valley State SIP Strategy contains those elements necessary for the 2018 Plan that fall under CARB's authority to adopt and implement. CARB submitted the Valley State SIP Strategy along with all related documentation consistent with federal requirements to U.S. EPA on November 16, 2018. For completeness, CARB is incorporating by reference the Valley State SIP Strategy and related documentation in this submittal.

Motor Vehicle Emission Budgets

The 2018 Plan includes on-road motor vehicle emission budgets calculated using EMFAC2014. Upon U.S. EPA approval of EMFAC2017 anticipated in the second quarter of 2019, these budgets will be outdated and will need to be revised using EMFAC2017 prior to the expiration of the grace period established by U.S. EPA. CARB will submit updated budgets for the 2018 Plan to U.S. EPA by the fourth quarter of 2020. CARB requests therefore that U.S. EPA limit its approval of the budgets submitted today to last only until the effective date of future U.S. EPA adequacy findings for replacement budgets. (See 40 CFR 93.118(e)(1).)

Without the ability to replace the applicable motor vehicle emission budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after the SIPs are submitted, due to the SIP approval process. We appreciate U.S. EPA's willingness to work with CARB staff in our efforts to utilize motor vehicle emission budgets based on the most up-to-date, accurate data as soon as possible upon availability.

Past Submittals

The comprehensive 2018 Plan supersedes past submittals to U.S. EPA which the agency has not yet acted on for the 1997 and 2006 standards. Specifically, the portions of the 2018 Plan pertaining to the 1997 standard supersede all elements of the *2015 Plan for the 1997 PM_{2.5} Standard* (submitted by CARB on June 25, 2015), including motor vehicle emission budgets (submitted by CARB August 13, 2015). The portions of the 2018 Plan pertaining to the 2006 standard supersede all portions of the *2012 PM_{2.5} Plan* for the 2006 standard (submitted by CARB March 4, 2013) which do not pertain to Moderate area requirements.

Clarifying Information

Lastly, U.S. EPA has requested that CARB provide clarifying information regarding model sensitivity related to ammonia as a precursor to PM_{2.5} and controls to reduce ammonia emissions. CARB's response is provided in Attachment A to this letter.

Mr. Mike Stoker

May 9, 2019

Page 4

CARB staff is committed to working with U.S. EPA staff to provide any additional clarifying information needed. If you have any questions, please contact Mr. Kurt Karperos, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Dr. Michael Benjamin, Chief, Air Quality Planning and Science Division, at (916) 201-8968.

Sincerely,



Richard W. Corey
Executive Officer

Enclosures

cc: Ms. Elizabeth Adams, Acting Director
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