2021 PM10 Maintenance Plan for the South Coast Air Basin

Public Consultation Meeting
April 15, 2021
Regional air pollution control agency

- 17 million residents
- 12+ million vehicles

SOUTH COAST AQMD

- Air quality regulations
  - Industrial facilities
  - Other sources (e.g. paint, fireplaces, etc)

- Enforcement
  - Inspections
  - Responding to air quality complaints

- Technology to reduce air pollution

- Air monitoring

- Public outreach
South Coast Air Basin
1987 24-Hour PM10 National Ambient Air Quality Standard (NAAQS)

<table>
<thead>
<tr>
<th>Year</th>
<th>Level of Standard</th>
<th>Calculation</th>
<th>Criteria for Attainment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1987</td>
<td>150 µg m⁻³</td>
<td>Number of exceedances for 24-Hour average PM10</td>
<td>Not to be exceeded more than once per year (on average over 3 years)</td>
</tr>
</tbody>
</table>
South Coast Air Basin Attainment Status for PM10

• South Coast Air Basin was previously classified as moderate nonattainment
• In February 1993 South Coast Air Basin was reclassified from moderate to serious nonattainment
• South Coast AQMD developed control strategies for PM10 in the 1997, 2003, and 2007 Air Quality Management Plans (AQMPs)
• In July 2013 South Coast Air Basin was designated as attainment for PM10
Decreasing PM10 in the South Coast Air Basin

The South Coast Air Basin has not violated PM10 standard since 2008
**Maintenance Plan**

- **Maintenance plan** is a requirement for designation as attainment\(^1\)
- State must submit a second maintenance plan 8 years after designation as attainment\(^2\)

### Timeline

- **July 2013**
  - South Coast Air Basin designated as attainment for 24-Hour PM10 NAAQS

- **2013 – 2023**
  - Period covered by the first PM10 maintenance plan

- **2023 – 2035**
  - Period covered by the second PM10 maintenance plan

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\(^1\) Section 107(d)(3)(E) of the Clean Air Act (CAA)

\(^2\) Section 175A of the CAA
1. Analysis of the first maintenance plan period (2013-present) to show that:
   - South Coast Air Basin has continued to attain NAAQS
   - Continued attainment was not solely a result of favorable meteorology
2. Maintenance demonstration to show that we will continue to attain the standard
3. Commitment to maintain a future monitoring network
4. Commitment to verify continued attainment
5. Establish contingency plan
Exceptional Events

Exceptional events are not counted as exceedances if:

1. Event clearly caused the exceedance
2. Event is not reasonably controllable or preventable
3. It is a natural event or an event caused by human activity that is unlikely to recur at a particular location
PM10 Exceptional Event Types

Wildfires

Evidence must show that the wildfire caused the measured exceedance.

High Winds

- High wind speeds are present
- The dust entrained by high winds is transported to the monitoring site
- Wind speeds in the source region must be high enough to entrain natural soils or overwhelm reasonable controls on anthropogenic sources
- Sustained wind speed of at least 25 miles per hour (U.S. EPA guidance)

Fireworks

Such use of fireworks is significantly integral to traditional national, ethnic, or other cultural events including, but not limited to, July Fourth celebrations.
Nearly all PM10 exceedances in the South Coast Air Basin were caused by suspected high-wind or wildfire smoke exceptional events.

*Wind speeds at the air quality station, within 5 miles, or upwind along the route of dust transport were higher than 25 mph
Calculation of PM10 Design Value

Measure 24-Hour average PM10 concentration (or calculate from hourly measurements)

Calculate number of exceedances of 150 µg/m³ in a year.

Calculate average number of exceedances over consecutive 3-year period

PM10 NAAQS is attained if average number of exceedances is less than 1

Locations where PM10 is measured

PM10 Monitors
- Filter-Based instruments (24-hour average)
- Continuous Instruments (hourly)
- South Coast Air Basin
Trend of Design Value

• After removing suspected exceptional events there were two exceedances of the 24-hour PM10 NAAQS over the first maintenance period

• Three-year 24-hour PM10 design value did not exceed the NAAQS
Trends of Meteorological Factors that Influence PM10

- Analyzed rainfall in detail because it reduces PM10 concentrations
- Rainfall tended to be lower than average during 2010 - 2020
  - 15.1 inches compared with 18.1 inches during 1990 – 2009
  - Rainfall conditions were not particularly conducive to lower PM10 concentrations
- Unlikely that systematic trends in other meteorological factors were conducive to lower PM10 concentrations

PM10 is the average across all stations.
Method to Demonstrate Maintenance

**Emissions Inventory Method**
- Future emissions of a pollutant or its precursors will not exceed the level of the attainment year inventory
- Attainment inventory is the emissions inventory for the year for which corresponding measured PM10 design value shows attainment

**Modeling Method**
- Modeling results show that future anticipated mix of sources and emissions will not cause a violation of the NAAQS
Timeframe included in Maintenance Demonstration

2018
- Base Year
- Attainment Inventory

2023
- Interim year

2031
- Interim year

2033
- 10-year earmark from the approval of 1st plan

2035
- New maintenance horizon

2 – Maintenance Demonstration
Emissions Inventory for Maintenance Demonstration

2016 AQMP
- Stationary area sources
- Off-road mobile sources

2018 SIP update
- Ocean Going Vessels emissions

2020 SIP revisions
- Point sources from 2018 Annual Emissions Reporting program

Preliminary 2022 AQMP
- On-road mobile source emissions
- Traffic activity from 2020 Regional Transportation Plan
- Emissions rate from EMFAC 2017
Major Sources of PM10 Emissions

- Paved Road Dust: 57.2 tons/day
- Construction and Demolition: 22.7 tons/day
- Cooking: 11.5 tons/day
- Light Duty Passenger Auto (LDA): 11.1 tons/day
- Residential Fuel Combustion: 6.8 tons/day
- Unpaved Road Dust: 5.9 tons/day
- Wood and Paper: 4.5 tons/day
- Mineral Processes: 4.5 tons/day
- Light Duty Trucks 2 (T2): 4.1 tons/day
PM10 Emissions Trend

- PM10 emissions increase marginally due to population and economic growth.
- Because PM10 design value is approximately 50% of the NAAQS, this marginal increase is not expected to affect attainment status.
• NOx emissions decrease substantially in the future
• VOC emissions in 2035 are lower than 2018

20 – Maintenance Demonstration
SOx and NH3 emissions increase marginally, however, their contributions to ambient PM10 concentration are de minimis, therefore, the marginal increases are not expected to interfere with continued attainment status.
Emissions in 2010 Plan vs 2021 Plan

**PM10**
- 2020/2018: 300 tons, 2021: 308 tons
- 2023: 330 tons, 2021: 330 tons

**NOx**
- 2020/2018: 525 tons, 2021: 506 tons
- 2023: 506 tons, 2021: 512 tons

**VOC**
- 2020/2018: 499 tons, 2021: 496 tons
- 2023: 508 tons, 2021: 508 tons

**SOx**
- 2020/2018: 51 tons, 2021: 55 tons
- 2023: 14 tons, 2021: 15 tons
- 2030/2031: 72 tons, 2021: 16 tons
Maintain the PM10 Attainment Status through 2035

• The PM10 and its precursor emissions trends and the recent PM10 design values indicate that the South Coast Air Basin will maintain the attainment status at least through 2035.

• The PM10 and its precursors emissions in this Plan are much lower than those estimated in the 2010 Plan, due to implementation of various regulations targeting PM and its precursors. This provides additional assurance that the South Coast Air Basin will maintain the attainment status in the future.
Future Monitoring Network

• South Coast AQMD currently exceeds all minimum monitoring requirements for PM10 network design and operation
• South Coast AQMD is committed to refinement of the PM10 monitoring network*
• In consultation with U.S. EPA Region 9, the PM10 FRM monitoring network will selectively transition to PM10 FEM continuous analyzers
• This modification will provide better resolution of PM10 data, continue to exceed all minimum monitoring network requirements, and verify attainment status
• Continuous instruments are also used for air quality forecasting, advisories, and real-time air quality index values

*As described in the July 1, 2020 Five Year Air Monitoring Network Assessment Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/monitoring-network-plan
Verification of Continued Attainment

U.S. EPA guidance requires air districts to track progress of maintenance plans over time through either:

- Periodic updates to the emissions inventory
- Periodic review of the inputs and assumptions used for the emission inventory and subsequent updates to the inventory if those inputs or assumptions have significantly changed

South Coast AQMD is committing to verify continued attainment based on review of the inputs and assumptions used for the emission inventory:

- When new information becomes available
- If this periodic review indicates that inputs and assumptions have changed significantly, South Coast AQMD will:
  - Work with CARB to update the existing inventory
  - Evaluate the revised inventory against the inventories presented in the maintenance plan
  - Evaluate the potential impacts
Contingency Plan

• Maintenance plan should*
  1. Identify control measures that may be implemented as a contingency in the event of emission increase
  2. Identify the indicators or triggers that will determine when contingency measures should be implemented

*Clean Air Act Section 175A(d)
Contingency Plan Trigger

- Contingency plan is triggered if number of PM10 exceedances, excluding exceptional events, exceeds the National Ambient Air Quality Standard.
- Weight-of-evidence method will be used by South Coast AQMD to exclude exceptional events.

### Considerations for exclusion of exceptional events

<table>
<thead>
<tr>
<th>Wind-Blown Dust</th>
<th>Wildfires</th>
<th>Fireworks</th>
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<tbody>
<tr>
<td>• Source of dust that caused exceedance is identified</td>
<td>• Wildfire that caused the exceedance is identified</td>
<td>• Exceedance occurs on July 4th or 5th or January 1st</td>
</tr>
<tr>
<td>• Various criteria and data sources*</td>
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<td>• Simultaneous increase of PM2.5 with the PM10 exceedance</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Fireworks that clearly caused the measured PM10 exceedance are identified</td>
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*Including warnings, advisories, wind measurements, satellite imagery, webcams, back trajectory analysis, forecasts, social media
Contingency Plan Actions (Only If Triggered)

Consult with the regulated industry to determine if voluntary or incentive-based control measures could reduce emissions, if feasible

Evaluate whether improved education and training for mitigating fugitive dust emissions could reduce emissions

Evaluate whether changes to enforcement of existing rules could reduce emissions

Evaluate amending selected Rules to further strengthen prohibitions on particulate emissions

Propose new rules to reduce particulate emissions

### Selected rules that may be evaluated to strengthen prohibitions on particulate emissions

<table>
<thead>
<tr>
<th>Rule Name</th>
<th>South Coast AQMD Rule</th>
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<tr>
<td>Fugitive Dust</td>
<td>403</td>
</tr>
<tr>
<td>Open Burning</td>
<td>444</td>
</tr>
<tr>
<td>PM10 Emission Reductions from Aggregate and Related Operations</td>
<td>1157</td>
</tr>
<tr>
<td>Storage, Handling, and Transport of Coke, Coal, and Sulfur</td>
<td>1158</td>
</tr>
<tr>
<td>PM10 Emissions from Paved and Unpaved Roads and Livestock Operations</td>
<td>1186</td>
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Contingency Plan Schedule

- **Exceedance Recorded**
  - South Coast AQMD calculates 24-hour PM10 design value

  - Violation

  - Four months after end of quarter exceedance is measured

    - South Coast AQMD conducts analysis of exceptional event

      - South Coast AQMD believes event meets criteria for exclusion

      - U.S. EPA and CARB review data

      - U.S. EPA does not concur on exceptional event

    - Does not meet criteria for exclusion

      - South Coast AQMD triggers contingency actions

        - Contingency actions completed 18 months after trigger

        - Actions completed

If U.S. EPA concurs on exceptional event: Contingency actions are not triggered and pending contingency actions for the specific violation are abandoned
Public Process (2021)

April
- Draft Plan Released (April 8)
- Public Consultation Meeting (April 15)
- Public Comments Due (April 26)

May
- Mobile Source Committee (May 21)
- Draft Final Plan Released (May 4)

June
- South Coast AQMD Board Consideration (June 4)
- CARB Board Consideration (June 24)

July
- Submit to U.S. EPA for inclusion in the State Implementation Plan
Supporting Documentation

Draft 2021 PM10 Maintenance Plan for the South Coast Air Basin
Contact Information

• Address questions, comments, documents, or other relevant information to:
  
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• Written comments should be submitted no later than Monday, April 26, 2021