Appendix 3a: Community Profile

Process of CSC Input on CERP Elements

The elements and actions described in the CERP were developed during monthly CSC meetings and workshops, where committee members, members of the public, and South Coast AQMD staff worked together to discuss the various air quality concerns within the community boundary and identified opportunities to address them. The input process is summarized in Table Appendix 3a-1.

Table Appendix 3a-1: Process of CSC Input on CERP Elements

| Meeting | Discussion Topic(s) | CSC input | How was this CSC input used in the CERP development process? |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| CSC Meeting #1 February 20, 2020 | CSC Orientation CSC Charter Community Boundary Air Monitoring Source Attribution Air Quality (AQ) Prioritization Activity | Identified Community Boundary and AQ concerns Requested revisions to charter and meeting format Outcome: List of AQ concerns and request for further Charter discussion | Boundary is used to define focus area for CERP actions. AQ concerns were identified for potential inclusion in the CERP. |
| CSC Meeting #2 May 20, 2020 | CERP timeline and process CSC meeting format, charter, and schedule Informational handouts (on two (2) proposed AQ Priorities) CARB Blueprint overview | CSC sub-group to work on draft charter Requested additional charter working group meetings Outcome: Charter Working Group Meetings (see Charter Working Group Meetings #1 to 4). | CSC Charter guides CSC meeting format and decision-making process during CERP development. |
| Charter Working Group #1 June 23, 2020 | CSC Charter, including: Goals and Mission Statement Responsibilities and Membership Meeting Procedures Brown Act Elements and Stipends | Requested a Google Document for CSC members to provide input on the charter Some CSC members requested that the CSC become a Brown Act Committee Outcome: Provided CSC Charter Google Document and informational handout on the Brown Act | CSC Charter guides CSC meeting format and decision-making process during CERP development. |

| CSC Meeting #3 June 25, 2020 | Finalize Community Boundary CSC Charter Working Group Meeting summary CERP and CAMP Process Overview Brown Act Overview Proposed AQ Priorities Air Monitoring | Requested CERP development be delayed until charter is finalized Requested educational workshop on the Salton Sea and Pesticides Some CSC members requested the CSC become a Brown Act Committee Outcome: Three (3) additional Charter Working Group Meetings, educational workshop on Salton Sea and Pesticides, Combined AQ Priorities Open Burning and Illegal Dumping as one | Boundary is used to define focus area for CERP actions. CSC Charter guides CSC meeting format and decision-making process during CERP development. Strategies and Actions will be tailored to address Open Burning and Illegal Dumping. |
|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Charter Working Group #2 July 15, 2020 Charter Working Group #3 July 22, 2020 Charter Working Group #4 July 29, 2020 | CSC Charter, including: Goals and Mission Statement Responsibilities and Membership Meeting Procedures Brown Act Elements and Stipends | Line-by-line feedback provided on the CSC Charter Google Document Some CSC members requested again that the CSC become a Brown Act Committee CSC sub-group voted to decide if the whole CSC should have a formal vote on pursuing becoming a Brown Act Committee Outcome: Incorporated CSC sub-group suggestions and edits. Vote results were 15-4-1 for No, Yes, and Abstained, respectively. | CSC Charter guides CSC meeting format and decision-making process during CERP development. |

| Salton Sea and Pesticides Workshop July 30, 2020 | Salton Sea presentations: Imperial Irrigation District (IID) California Air Resources Board (CARB) South Coast AQMD's Monitoring program University of | Asked about air monitoring, including public access to data and expanding the network, and the composition and health impacts of the dust around the Salton Sea Outcome: CSC input, such as deploying additional monitors, expanding the network, and collaborating with other agencies, was incorporated into CERP actions, where feasible | CSC input was incorporated into CERP actions to address Salton Sea and Pesticides, where feasible. |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| CSC Meeting #4 August 26, 2020 | Coachella Valley ozone standard reclassification South Coast AQMD's Open Burn Program Resources for reporting illegal dumping Overview of Technical Advisory Group (TAG) Meeting CSC Draft Charter | Provided details on Open Burning and/or Illegal Dumping concerns and suggested alternatives to open burning Requested the Draft CSC Charter be translated into Spanish before a formal CSC vote is conducted Outcome: CSC input was incorporated into CERP actions, where feasible. Staff provided Draft CSC Charter in English and Spanish. | CSC input was incorporated into CERP actions to address Open Burning and Illegal Dumping, where feasible. |

| CSC Meeting #5 September 24, 2020 | Finalize CSC Charter CERP Development timeline and process to meet statutory deadlines Finalize AQ Priorities | Vote to approve the CSC Charter resulted in 25-1-2 for Yes, No, and Abstained, respectively Suggested potential CERP strategies and actions (i.e., monitoring) Requested informational handouts with emissions data (if available) and potential CERP actions for four (4) AQ Priorities: Salton Sea, Pesticides, Fugitive Road Dust, and Open Burning and Illegal Dumping Requested survey to prioritize AQ priority to develop for December CERP submittal Outcome: | Suggestions on CERP strategies and actions (i.e., monitoring) were incorporated in the informational handouts and into the CERP. |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Provided 4 AQ Priority informational handouts and AQ Priority Survey | |
| CSC Q & A Workshop October 7, 2020 | Open forum Question & Answer Session for four (4) AQ Priority informational handouts | Suggested ways to refine some proposed actions and emissions data and suggested additional actions Requested staff re-survey CSC to rank the four (4) AQ priorities in chronological order of how they would like the AQ priorities to be addressed Outcome: Input was incorporated in CERP, where feasible. | CSC input used to refine CERP actions and include additional actions. AQ Priority survey prioritized development of AQ Priority chapters in the CERP. |
| CSC Meeting #6 October 14, 2020 | Summary of recent meetings CSC suggestions from Q & A Workshop AQ Priority Survey results | Requested all six (6) AQ Priorities to be developed in the CERP Outcome: CERP includes six (6) AQ Priority chapters | CERP includes six (6) AQ Priority chapters. |

| CSC Meeting #7 October 22, 2020 | CERP development process, plan elements, timeline, and next steps Draft CERP actions | Suggested additional collaborating entities (e.g., Riverside County Waste Management Services), educational information, and land use actions Requested the CERP be released in English and Spanish and South Coast AQMD conduct two CSC meetings in November Outcome: Staff provided Discussion Draft CERP in English and Spanish and conducted two November meetings (see CSC Meetings #8 and 9 below). | CSC input was incorporated into the CERP, where feasible. |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| CSC Meeting #8 November 12, 2020 | Chapter 5 Draft CERP; Proposed actions, goals, metrics; Development Process Timeline | Feedback on Discussion Draft CERP. Ideas for specific goals for each CERP action. Outcome: Incorporate CSC input for Draft CERP | Feedback on Draft CERP and ideas for specific goals will be used to inform the Draft CERP prior to Stationary Source Committee. |
| CSC Meeting #9 November 19, 2020 | CERP final comments and CSC approval | Feedback on CERP prior to Stationary Source Committee Outcome: Final CERP presented to the South Coast AQMD Governing Board | Final comments to be addressed in December 2020 Governing Board Package. |

Key Stationary Sources in the Community

The South Coast AQMD develops and enforces air pollution regulations to reduce emissions, improve air quality and protect public health. Many South Coast AQMD rules apply to a specific type of operation or pollution source. *Figure Appendix 3a-1* describes the number of facilities in this community that are subject to some key South Coast AQMD rules to control emissions from facilities processing metals. The figure also includes information about facilities that are in important state and federal programs, which include major sources of air pollution or other types of environmental pollution.

Figure Appendix 3a-1: Key stationary sources in the Eastern Coachella Valley community, by regulatory program



1 Facility in the AB2588 program

Assembly Bill 2588 (AB2588) is a statewide program that focuses on reducing air toxics pollution from facilities, and requires facilities above certain levels to disclose and/or reduce risks



1 Facility subject to U.S. EPA Title V

The **U.S. EPA Title V program** is a permitting program that includes all major sources of air pollutants across the United States.

Information on Best Available Retrofit Control Technology and the AB 2588 Program

AB 617 requires air districts to implement Best Available Retrofit Control Technology (BARCT) for facilities in the state greenhouse gas cap-and-trade program by December 31, 2023. The Eastern Coachella Valley community does not have any facilities that are subject to BARCT nor any larger facilities that are in the REgional CLean Air Incentives Market (RECLAIM) program. In addition, CARB's Blueprint states that facilities located within the community with Risk Reduction Plans under the Assembly Bill (AB) 2588 program must be identified. Descriptions of the facilities that are subject to BARCT (specifically RECLAIM facilities) and the AB 2588 program are provided below.

Best Available Retrofit Control Technology (BARCT)

RECLAIM facilities

Facilities within the RECLAIM program are typically larger facilities that have NOx emissions greater than four tons per year. The RECLAIM program¹ uses a market-based approach to achieve emission reductions from facilities for nitrogen oxides (NOx) and sulfur oxides (SOx) in the aggregate. However, an analysis of the RECLAIM program has shown that the ability to achieve NOx emission reductions using a market-based approach has diminished; therefore, pursuant to Board direction, RECLAIM NOx facilities will transition² to a command-and-control regulatory structure to ensure facilities meet BARCT. RECLAIM facilities that are also in the State greenhouse gas cap-and—trade program are subject to the BARCT requirements of AB 617. South Coast AQMD staff completed an analysis of the equipment at each RECLAIM facility, giving higher priority to older, higher polluting units that will need to install retrofit controls. The higher polluting units at RECLAIM facilities will be or have been evaluated for BARCT and will be subject to the following

¹ South Coast AQMD, RECLAIM, http://www.aqmd.gov/home/programs/business/business-detail?title=reclaim, Accessed September 10, 2020.

² For more information on the RECLAIM transition please see: http://www.aqmd.gov/home/rules-compliance/reclaim-transition.

South Coast AQMD rules: Rules 1109.1,3 1110.2,4 1117,51118.1,6 1134,71135,8 1146, 1146.1, 1146.2,9 1147, 1147.1,10 and 1147.2.11 A BARCT assessment includes an evaluation of emission limits for existing units, South Coast AQMD regulatory requirements, other regulatory requirements, and pollution control technologies. Although the AB 617 program calls for an expedited schedule for BARCT, there are no RECLAIM facilities or BARCT facilities within the Eastern Coachella Valley community.

Non-RECLAIM facilities

As a result of the BARCT assessment conducted for RECLAIM facilities, some equipment at non-RECLAIM facilities will also be affected and will be required to meet BARCT NOx emissions. The BARCT assessment is still currently being conducted for a number of rules and the list of affected non-RECLAIM facilities that may be subject to additional requirements is being developed, none of which are within the Eastern Coachella Valley community boundary.

AB 2588 Program

The AB 2588 Program¹² is a statewide program that requires air districts to inventory air toxics from individual facilities. 13 The AB 2588 program is implemented in South Coast AQMD through

³ South Coast AQMD, PR 1109.1: Refinery Equipment, http://www.aqmd.gov/home/rulescompliance/rules/scaqmd-rule-book/proposed-rules#1109.1, Accessed September 10, 2020.

⁴ South Coast AQMD, PAR 1110.2: Emissions from Gaseous and Liquid-Fueled Engines, http://www.aqmd.gov/home/rules-compliance/rules/scagmd-rule-book/proposed-rules#1110.2, Accessed September 10, 2020.

⁵ South Coast AQMD, Rule 1117: Emissions of Oxides of Nitrogen from Glass Melting Furnaces, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1117.pdf, Accessed September 10, 2020.

⁶ South Coast AQMD, PR 1118.1: Control of Emissions from Non-Refinery Flares, https://www.aqmd.gov/home/rules-compliance/compliance/r1118-1, Accessed September 10, 2020.

⁷ South Coast AQMD, PAR 1134: Emissions of Oxides of Nitrogen, http://www.aqmd.gov/home/rules-

compliance/rules/scaqmd-rule-book/proposed-rules#1134, Accessed September 10, 2020.

⁸ South Coast AQMD, PAR 1135: Emissions of Oxides of Nitrogen from Electricity Generating Facilities, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1135, Accessed September 10, 2020.

⁹ South Coast AQMD, PAR 1146, 1146.1, 1146.2: Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters; Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters; Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters; and - Implementation Schedule for NOx Facilities, http://www.aqmd.gov/home/rules-compliance/rules/scagmd-rule-book/proposed-rules#1146, Accessed September 10, 2020.

¹⁰ South Coast AQMD, PAR 1147, 1147.1: NOx Reductions from Miscellaneous Sources, NOx Reductions from Large Miscellaneous Combustion, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposedrules#1147, Accessed September 10, 2020.

¹¹ South Coast AQMD, PAR 1147.2: NOx Reductions from Metal Processing Equipment, http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1147.2, Accessed September 10, 2020.

¹² South Coast AQMD, Air Toxics "Hot Spots" Program (AB 2588), http://www.aqmd.gov/home/rulescompliance/compliance/toxic-hot-spots-ab-2588, Accessed September 10, 2020.

¹³The South Coast AQMD's AB 2588 Program incorporates the requirements of the state AB 2588 program, as well as additional and/or more stringent requirements.

Rule 1402 - Control of Toxic Air Contaminants from Existing Sources¹⁴ which requires certain facilities to conduct Health Risk Assessments to assess the health risk (long-term versus short-term) to the surrounding community. Facilities are required to submit Health Risk Assessments¹⁵ based upon the toxicity and volume of toxic air contaminants released within proximity to potential receptors (e.g., hospitals, residences, work sites). Depending on the risk, facilities may be required to provide public notices and hold a public meeting. If a facility is determined to exceed the significant risk level, as determined by each air district, they are required to reduce this risk by submitting a Risk Reduction Plan (RRP).¹⁶ The RRP outlines what measures (e.g., high-efficiency particulate air (HEPA) filters) the facility will incorporate to reduce their risk. (Some facilities may be subject to the AB 2588 program, but do not exceed the action risk threshold and therefore are not required to submit a RRP.) Under Rule 1402, some facilities may also choose to voluntarily reduce their risk by submitting a voluntary RRP (VRRP).¹⁷ If a facility has an approved VRRP, the risks will be reduced below the voluntary risk threshold.

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¹⁴ South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf, Accessed September 10, 2020.

¹⁵ South Coast AQMD, Health Risk Assessment, http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/health-risk-assessment, Accessed September 10, 2020.

¹⁶ South Coast AQMD, Risk Reduction, http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/risk-reduction, Accessed September 10, 2020.

¹⁷ Some facilities may have submitted applications for a VRRP; however, if the facility is found to be already under the voluntary risk threshold, no further reduction measures are required.

Table Appendix 3a-2¹⁸ shows the one facility within the Eastern Coachella Valley community that is currently in the AB 2588 program in the South Coast AQMD. This table includes the facility name, location address, and the most recent status under the AB 2588 program. Facilities in the AB 2588 program without a RRP or VRRP will have the prioritization level (High, Intermediate, or Low)¹⁹ and what year the prioritization was conducted listed as the status. Prioritization is based on reporting every four years.

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¹⁸ Facilities listed in the table are reducing risk or in the process of reducing risk.

¹⁹ Facilities designated as high priority are required to submit Health Risk Assessments to assess the risk to their surrounding community based on their air toxics emissions. Facilities ranked as Intermediate priority are required to submit a complete toxics inventory once every four years. Facilities ranked as low priority are exempt from reporting.

Table Appendix 3a-2: Facility in the AB 2588 program within the Eastern Coachella Valley community

| Facility | | | Status within the AB |
|----------|---------------------|---------------------|----------------------------|
| ID | Facility Name | Facility Address | 2588 Program |
| 62862 | IMPERIAL IRRIGATION | 51-170 SHADY LN, | Prioritization from 2017 - |
| | DISTRICT/ COACHELLA | COACHELLA, CA 92236 | Intermediate |

Technology Clearinghouse

South Coast AQMD staff have been conducting Best Available Control Technology (BACT) analyses and working closely with CARB to provide data for the Technology Clearinghouse. Requirements for Toxics-Best Available Control Technology (T-BACT) are established through the adoption and amendment of rules affecting air toxics (i.e., Regulation XIV). Staff will reference the Technology Clearinghouse and applicable air toxic rule requirements (inclusive of state Air Toxic Control Measures (ATCMs) and federal National Emission Standards for Hazardous Air Pollutants (NESHAPs), when available, to evaluate potential tightening of South Coast AQMD rules through the rule development process. Permit considerations for both new and modified sources throughout the district are based on rule requirements.

Community Air Pollution Profile Details and Related Data

Understanding what air pollution sources exist in the community and what air pollutants come from these sources helps identify key issues that can be addressed through CERP actions. This section presents data based on previous cumulative impact studies²⁰ to describe the impacts of toxic air pollutants in this community, as well as other environmental pollution, public health factors, and social and economic factors that make people more sensitive or vulnerable to the health effects of pollution.²¹

Air toxics are one group of air pollutants that can affect public health on a local community scale. This includes pollutants from diesel exhaust, metal particulate pollutants (e.g., hexavalent chromium, lead, arsenic, nickel, etc.), and gases (e.g., benzene, formaldehyde, etc.). The South Coast AQMD conducts the Multiple Air Toxics Exposure Study (MATES) every few years to understand the cumulative health impacts of air toxics in communities across the region. The most recently completed study was MATES IV, which was released in 2015, and used air toxics monitoring, emissions inventories, modeling, and health risk assessment techniques to calculate the cancer risk due to toxic air pollutants ("air toxics cancer risk").²² MATES V is currently in

²⁰ More information regarding MATES IV and the final report can be found on South Coast AQMD's website at, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/matesiv.

²¹ Office of Environmental Health Hazard Assessment. CalEnviroScreen 3.0. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30, Accessed September 10, 2020.

²² More information regarding MATES IV and the final report can be found on South Coast AQMD's website at: http://www.agmd.gov/home/air-quality/air-quality-studies/health-studies/matesiv.

progress. Based on MATES IV modeled data, approximately three-quarters of the air toxics cancer risk in the Basin is due to diesel particulate matter (

Figure Appendix 3a-2). The average air toxics cancer risk in the Eastern Coachella Valley community is lower than the Basin-wide average and dominated by diesel particulate matter.

Figure Appendix 3a-2: Air toxics cancer risk, based on MATES IV modeled data

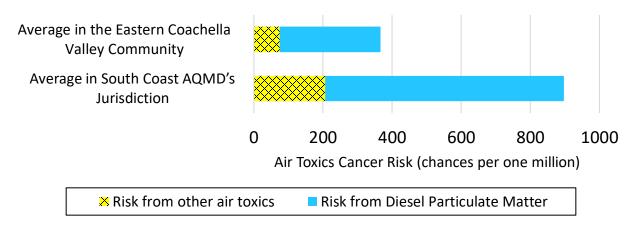


Figure Appendix 3a-3:Diesel mobile sources in Eastern Coachella Valley



Mobile sources include trucks, trains, cars, buses, and other mobile equipment, such as farming and off-road equipment. Much of this equipment is powered by diesel, which is the air toxic pollutant with the highest impact in this community. The community includes more than 46 miles of freeways, and many of these are located near residential areas (

Figure Appendix 3a-3).

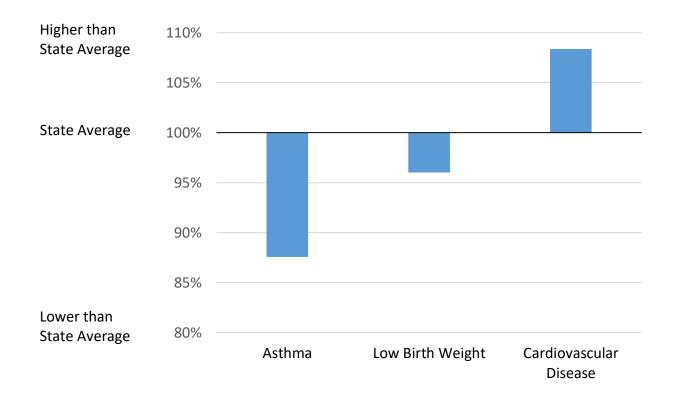
Understanding the community's public health and socioeconomic profile helps to provide context for the work being done through this CERP. CalEnviroScreen 3.0 is a screening tool developed by the California Office of Environmental Health Hazard Assessment (OEHHA) that is

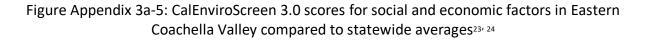
used to identify communities that are most affected by various sources of pollution, and where people are especially vulnerable to the effects of pollution. The CalEnviroScreen 3.0 data show that this community has public health factors, as well as social and economic factors, that make the community more sensitive and vulnerable to the harmful effects of air pollution compared to statewide averages (

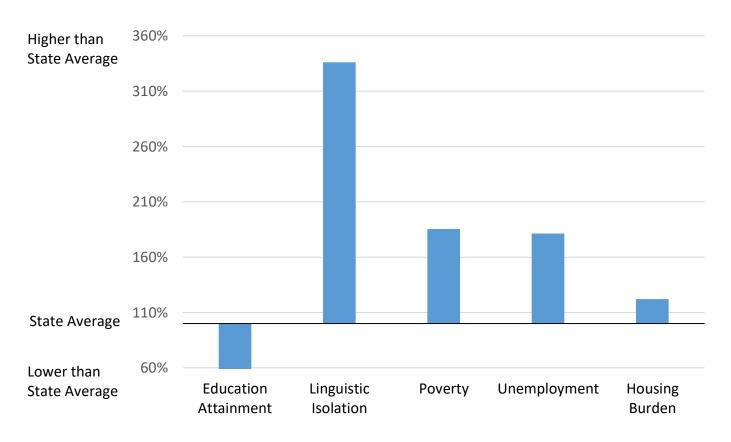
Figure Appendix 3a-4 and

Figure Appendix 3a-5). These data show that, on average, the Eastern Coachella Valley community has generally better public health factors and generally more social and economic disadvantages compared to California as a whole. The public health factors specifically show that this community has higher rates of emergency department visits for heart disease, and lower rates of asthma and babies born with a low weight in comparison to statewide averages.

Figure Appendix 3a-4: CalEnviroScreen 3.0 scores for public health factors in Eastern Coachella Valley compared to statewide averages







²³ The metric of Educational Attainment in CalEnviroScreen 3.0 is defined as the percent of people whose highest level of education is less than a high school education. A lower percentile score shown in the blue bar on the graph for this metric means the community has fewer people who have completed a high school education.

²⁴ The metric of Linguistic Isolation in CalEnviroScreen 3.0 is defined as the percent of households where no one over age 14 speaks English well. A higher percentile score shown in the blue bar on the graph for this metric means there are more households that meet this definition.