



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

April 17, 2008

Ms. Deborah Jordan, Director
Air Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA, 94105

Dear Ms. Jordan:

RE: Clarification of Contingency Commitment in 2007 PM10 Maintenance Plan

I am writing to clarify the commitment of the San Joaquin Valley Unified Air Pollution Control District (District) made in the Contingency Plan section of the 2007 PM10 Maintenance Plan and Request for Redesignation. As noted on pages 16 and 17 of this Plan, the District commits to taking "appropriate action" within 18 months of verified ambient air monitoring data showing that the contingency plan action level of 155 ug/m³ has been triggered. The District then outlines a three-step action process that culminates in the identification and prioritization of additional PM10 control measures to provide emission reductions above and beyond those used to demonstrate maintenance and those already implemented at the time the trigger level was exceeded. I want to clarify that this commitment includes the adoption and implementation of the additional control measures before the end of the 18-month period. The 18-month commitment would not apply to events for which the District has submitted natural/exceptional event documentation to EPA for approval.

I also wish to point out that control measure commitments in our *2008 PM2.5 Plan*, which is scheduled to be considered for adoption by the District Governing Board on April 30, 2008, would provide an even larger quantity of emission reductions for use in the second step of the Contingency Plan, thereby reducing the need for the third step clarified above. Many of the measures in the *2008 PM2.5 Plan* (e.g., strengthening the Residential Wood Combustion Rule) would reduce emissions of nitrogen oxides (NOx) and direct PM10.

Seyed Sadredin

Executive Director/Air Pollution Control Officer

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We appreciate EPA's diligence and hard work in reviewing the federal requirements for redesignating the San Joaquin Valley to attainment for the federal PM10 standards. Approval action on the *2007 Maintenance Plan* is a critical step in this process and is also critical for transportation conformity budgets and avoiding the loss of federal funds for transportation projects. Please contact Dr. Donald Hunsaker of our staff (559-230-5838) if you need additional information or clarification of other items.

Sincerely,



Seyed Sadredin
Executive Director/Air Pollution Control Officer

Cc: Lynn Terry, California Air Resources Board