



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, CA 93514
Tel: 760-872-8211 Fax: 760-872-6109

September 7, 2018

Via Electronic and U.S. Mail

Ms. Gwen Yoshimura
US EPA Region IX (AIR-7)
75 Hawthorne Street
San Francisco, California 94105

Re: Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area

Dear Ms. Yoshimura:

Please find attached Great Basin Unified Air Pollution Control District (District) Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area (Mitigation Plan), for your consideration. Included in this package with the attached final Mitigation Plan are the following documents:

- Legal notice opening the 30-day public comment period for the Mitigation Plan
- Comment letter from the City of Los Angeles Department of Water and Power (LADWP)
- District Board Report from the September 6, 2018 Regular Governing Board Meeting adopting the Mitigation Plan
- District Governing Board Order from the September 6, 2018 Regular Governing Board Meeting adopting the Mitigation Plan

The District's responses to the LADWP's comments on the Mitigation Plan were incorporated into the revised Mitigation Plan adopted by the Governing Board, thus no separate response beyond that was made. Please note additional public comment was received from LADWP during the Public Hearing at the District's Regular Governing Board Meeting in Bridgeport, California on September 6, 2018. These verbal comments expressed appreciation for the opportunity to provide comments and acknowledged that DWP agreed with District Air Pollution Control Officer as it relates to the comments that were made and how they were incorporated in the final Mitigation Plan. There were no further comments received beyond those submitted by the LADWP during the public comment period.

If you have any further questions regarding the District's Mitigation Plan, please do not hesitate to contact me or Chris Lanane, of my staff, by electronic mail at clanane@gbuapcd.org, or by telephone at extension 241 at the number above. Thank you for your time and your consideration.

Sincerely,



Phillip L. Kiddoo
Air Pollution Control Officer

Attachment:

Great Basin Unified Air Pollution Control District Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area

Enclosures:

20180907a - Legal notice opening the 30-day public comment period for the Mitigation Plan

20180907b - Comment letter from the City of Los Angeles Department of Water and Power (LADWP)

20180907c - District Board Report from the September 6, 2018 Regular Governing Board Meeting adopting the Mitigation Plan (without attachments)

20180907d - District Governing Board Order from the September 6, 2018 Regular Governing Board Meeting adopting the Mitigation Plan

Cc (via email):

Ms. Jennifer Williams, EPA IX
Ms. Ginger Vagenas, EPA IX
Ms. Theresa Najita, ARB-AQPS
Mr. Mike Miguel, ARB - MLD
Mr. Patrick Rainey, ARB - MLD
Mr. Nelson Mejia, LADWP
Ms. Ann Logan, GBUAPCD
Mr. Chris Lanane, GBUAPCD



Great Basin Unified Air Pollution Control District

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 www.gbuapcd.org

**Exceptional Events Mitigation Plan
for the
Coso Junction PM10 Planning Area**

Final – September 6, 2018

**Exceptional Events Caused by Windblown Dust
from Flash Flood Silt Deposits:**

**August 7, 2013
September 25, 2013
February 16, 2014
April 25, 2014
December 20, 2017**

1.0 Summary of Exceptional Events

On July 28, 2013, heavy rains fell in a matter of hours causing flash floods that inundated low-lying areas in the Rose Valley. This area comprises the western portion of the Coso Junction PM10 Planning Area (CJPA) (Figure 1.1). The entire valley floor, including US 395 and Gill Station Road, was inundated with silts and soils eroded by runoff from the Inyo Mountain range. These flood-borne materials remained in the low-lying areas after the floodwaters receded (Figure 1.2).

Although Caltrans and local owners cleaned up deep silt deposits from US 395 and Gill Station Road, the extensive deposits on the natural valley floor remained. These deposits dried and would later become significant sources of PM10 emissions during wind events, especially those events characterized by strong westerly winds driven down the east face of the Sierra Nevada range or those winds driven from the north from the Owens and northern Rose Valleys across the valley floor to the monitoring station. Following the flash flood, elevated PM10 levels were monitored at the Coso Junction monitoring station when winds were greater than about 7 m/s. Dust events driven by winds from the west that occurred on August 7, 2013, September 25, 2013, February 16, 2014, April 25, 2014, and December 20, 2017, resulted in exceedances of the National Ambient Air Quality Standard (NAAQS) for PM10 measured at the Great Basin Unified Air Pollution Control District's (District) Coso Junction PM10 monitoring station.

PM10 air quality exceedances caused by flash flood events fall under the category of a natural event, which EPA defines as "one in which human activity plays little or no direct causal role in the generation of emissions." (40 CFR 50.1(k)) The "not reasonably controllable or preventable," criterion applies to natural events, including natural sources and any contributing anthropogenic sources and activities. Following the flash flood, Caltrans and property owners removed silt deposits from roads and road shoulders as a highway safety measure. This action helped to reduce dust emissions from roads and adjacent areas. The silt-laden flood waters spread much of the material into outlying undisturbed desert areas. Windblown dust emissions from undisturbed desert areas would be considered not reasonably controllable or preventable according to EPA (80 FR 72858). Lower PM10 monitor concentrations in 2015 suggest that the flood deposits in the desert areas are in the process of being naturally stabilized through vegetation growth and surface crusting. Because reasonable steps were taken to prevent dust emissions from areas with human activity and the remaining dust emissions were coming from natural desert areas which EPA would consider not reasonably controllable or preventable, criterion 2 was satisfied. Therefore, this documentation primarily addresses the first criterion, that "the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation."

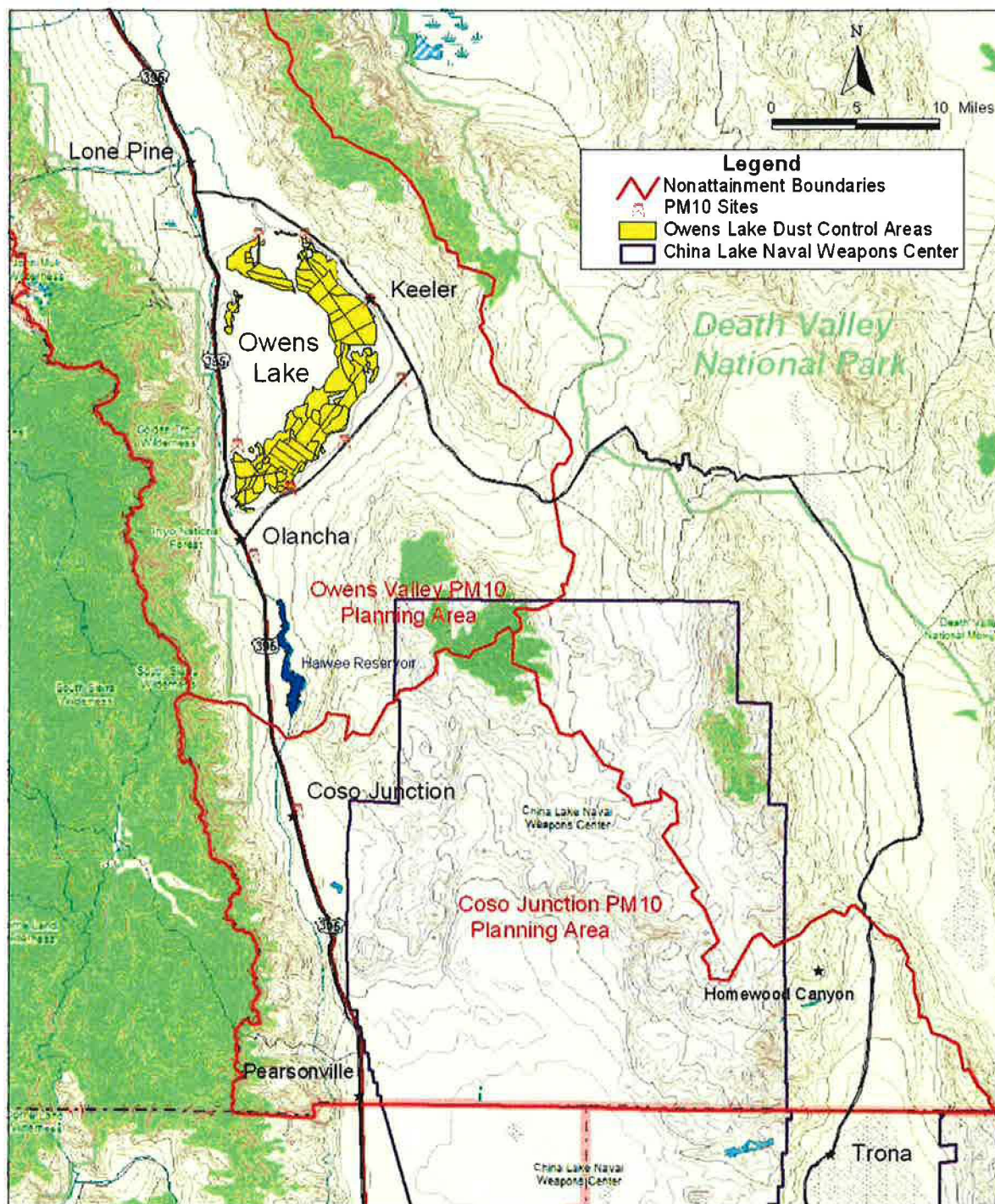


Figure 1.1 Coso Junction Planning Area located in the southern portion of Inyo County, California

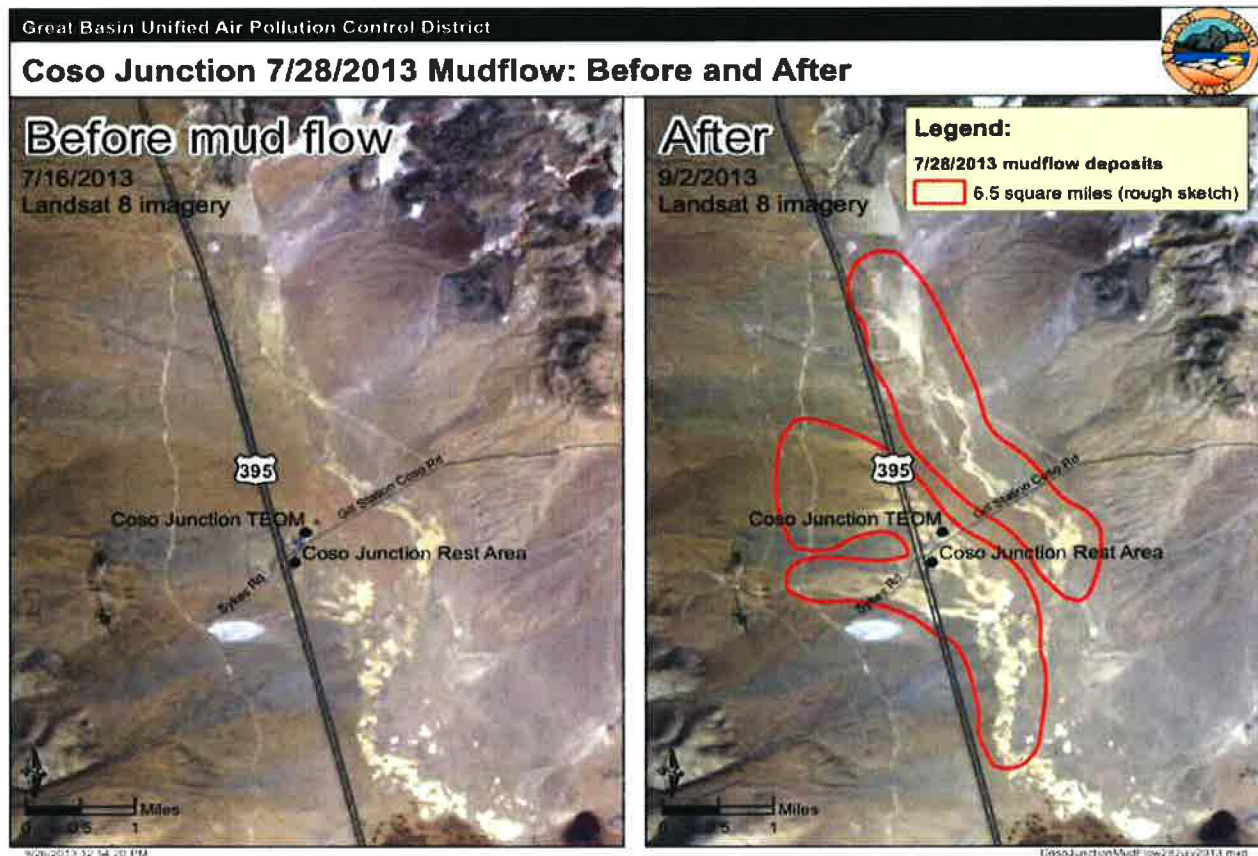


Figure 1.2 Satellite Imagery of Flood Deposits

2.0 Geographic Setting and Air Quality

The Coso Junction PM10 Planning Area (CJPA) is located in Eastern California in the southern portion of Inyo County which is a part of the Great Basin Unified Air Pollution Control District (Figure 2.1). This planning area is in arid desert area that receives less than 5 inches of rainfall per year. The area is rural in nature and sparsely populated. The principle PM10 monitoring site is located near the Coso Junction rest area in the Rose Valley at an elevation of 3,386 feet above sea level (ASL). This valley is flanked by the Sierra Nevada mountain range which rises to the west to 10,000 feet ASL, and the Coso Range to the east, which rises to over 8,000 feet ASL. The China Lake Naval Air Weapons Station, which covers most of the CJPA, is generally restricted from public access.

Predominant winds in the CJPA are north-south with an additional westerly component during some storm periods. Air pollution in the Coso Junction Planning Area in the past was dominated by windblown dust transported from Owens Lake (OL), 14 miles north of the CJPA, and located outside the planning area. However, since the completion of the installation of dust controls on 46.5 square miles of the emissive areas of Owens Lake by the City of Los Angeles Department

of Water and Power at the end of 2017, impacts from Owens Lake and points north have been significantly reduced. Air pollution from District permitted facilities within the CJPA boundaries are located east of the monitor site and due to prevailing winds do not have a significant impact on monitored PM10 concentrations in the planning area. These sources include the Coso geothermal power operations, military operations at the China Lake Naval Air Weapons Station, and volcanic cinder and pumice mining operations.

Excluding high wind events, winds in the CJPA are generally light at 3 m/s or less and air quality is excellent with PM10 concentrations ranging from 5 to 20 $\mu\text{g}/\text{m}^3$ for 24-hour averages and annual PM10 concentrations, averaging 17 $\mu\text{g}/\text{m}^3$ (Table 2.1). High wind event days (wind speeds >7 m/s for hourly averages) occur ten to fifteen times each calendar year. Exceedances of the federal PM10 standard (150 $\mu\text{g}/\text{m}^3$ for a 24-hour average) measured at the District's Coso Junction monitoring station are listed in Table 2.2.



Figure 2.1 Great Basin Unified Air Pollution Control District and Planning Areas

Annual PM10 Averages Coso Junction TEOM	
YEAR	Annual Average of 24 Hour PM10 Average *(excluding 24-hr PM exceedances -6 total)
2012	15.3 µg/m ³
2013	18.1 µg/m ³
2014	17.7 µg/m ³
2015	15.5 µg/m ³
2016	16.8 µg/m ³
2017	18.3 µg/m ³

Table 2.1 Annual Average PM10 Concentrations

PM10 Exceedances Coso Junction TEOM 2012-2017		
DATE	24 Hour PM10 Average	Source Wind Direction (from Hourly Wind Direction)
3/6/2012	173 µg/m ³	260-350 deg
8/7/2013	162 µg/m ³	140-270 deg
9/25/2013	157 µg/m ³	250-290 deg
2/16/2014	314 µg/m ³	250-270 deg
4/25/2014	261 µg/m ³	230-260 deg
12/31/2014	673 µg/m ³	350-360 deg
11/16/2016	266 µg/m ³	260-270 deg
3/31/2017	229 µg/m ³	320-005 deg
7/29/2017	195 µg/m ³	Paving operations; light winds, variable direction
12/20/2017	166 µg/m ³	250-275 deg

Table 2.2 PM10 Monitored Exceedances at Coso Junction

3.0 Public Notification and Education Program: District's Health Advisory Program for Dust and Smoke

The District issues health advisories when air pollution exceeds selected trigger levels based on District Rule 701, the District's Air Pollution Episode Plan. Health advisory notices are posted automatically to the District's website, emailed and sent via text message to schools and interested citizens in the affected communities and to local media outlets. Health advisories remain in effect for the remainder of the day on which called and, if appropriate, will be reissued as conditions change. People can sign up for the health advisories at the District's website (<https://gbuapcd.org/cgi-bin/AdvisorySignUp/Form>, Figure 3.1)

As noted in the District's Air Pollution Episode Plan (Rule 701), a **Stage 1** air pollution health advisory is issued when hourly particulate pollution (PM₁₀) levels exceed 400 micrograms per cubic meter (µg/m³) for dust and 100 µg/m³ for wildfire smoke. During a Stage 1 health advisory

the District recommends that children, the elderly, and people with heart or lung problems refrain from strenuous outdoor activities in the impacted area(s).

A **Stage 2** air pollution health advisory is issued when hourly particulate pollution levels exceed $800 \mu\text{g}/\text{m}^3$ for dust and $200 \mu\text{g}/\text{m}^3$ for wildfire smoke. With a Stage 2 health advisory the District recommends that everyone refrain from strenuous outdoor activities in the impacted area(s).

The District collects data from its extensive air quality monitoring network (17 permanent stations located throughout the District, see the District's 2018 Annual Air Quality Monitoring Network Plan) on an hourly basis. The data are polled hourly from the stations in the network and go through a preliminary validation process in the District's cloud-based database. The data are then posted to the District's website at 18 minutes after every hour. The data are backed up daily to an offsite location and are retained in the District's database for five years and then the electronic files are archived indefinitely.

Additionally, the data used to determine whether health advisories need to be issued for wildfire smoke events are reviewed, posted to the District's website, and then reviewed hourly during an event by a data processing professional. The advisories are evaluated before forwarding them via e-mail and text message. In the case of regional wildfire events, the District consults with other air agencies and with those agencies responsible for addressing wildfire issues, including: the US Forest Service (USFS), the Bureau of Land Management (BLM), CalFire, and others. The District works with these agencies to inform them of the air quality effects an event is having on the people within the District and to provide decisionmakers with the information needed in their determination of where their resources will be most effective most quickly.

The District air pollution health advisory program is not intended to replace the need to control dust and smoke problems in the Eastern Sierra, but it is intended to minimize human exposure to the pollution and to help reduce adverse health effects until dust control measures are imposed and/or fully implemented or the event ends. District Rule 401 addresses fugitive dust emissions and provides voluntary and recommended measures for reducing dust. District Rule 433 specifically addresses emissions from Owens Lake and describes the mitigation measures, in detail, for curtailing emissions from the lakebed. Residents and visitors in the District are encouraged to contact the District with any questions they have about the health advisory program or the District's activities in those areas requiring mitigation.

The District's website contains information for the public regarding potential health effects of the levels of dust and smoke (<https://gbuapcd.org/AirMonitoringData/HealthAdvisories/>), Figures 3.2, 3.3). There is also a link to additional information on particulate matter levels and health effects, sources of particulate matter, and descriptions of what is being done in the District to mitigate particulate levels (<https://gbuapcd.org/AirMonitoringData/ParticulateMatter/>).

Identification of Areas Of Concern

The District's extensive air quality network monitors impacts from known source areas within the District, the largest being the exposed playa areas of Owens Lake and Mono Lake, and any impacts within the two management areas within the District; Coso Junction and Mammoth

Lakes. These monitoring systems consist of instruments measuring particulate matter impacts in real time, providing hourly data to the District and the public via the District's website. Data are uploaded to the website at 18 minutes passed the hour for the previous hour. These data are also color coded to help the public see the impact of any events at a glance (<https://gbuapcd.org/>) and are on the District's home page.

**Emergency Monitoring System:
Additional Portable Particulate Matter Monitors**

The District operates two (2) E-BAMs, configured to monitor PM_{2.5}, that are used during wildfire events to monitor impacts in areas that are not covered by the District's permanent monitoring network (These monitors can be configured to monitor PM₁₀). The E-BAMs are deployed as wildfires occur and either begin or are forecasted to impact communities within the District. The E-BAMs are prepared in advance of the wildfire season so that they can be deployed within hours of a wildfire beginning to impact a community. These E-BAMs are also connected via satellite to the AirSis network, the data from which are used by the US Forest Service to supplement other monitor data for their Blue Sky predictive model. Data from the model are available online (<https://www.airfire.org/data/bluesky-daily/>). District staff also uses the Blue Sky model data to help determine the best locations for the installation of the emergency monitors. Data from the emergency monitors are also uploaded to the District's website on an hourly basis, and are also used in the District's health advisory system, so that people in the affected areas can get the information needed to determine their outdoor activity level.

Enhanced Community Monitoring

The District is in the process of replacing all of the current continuous PM₁₀ monitors in the communities with continuous PM₁₀/PM_{2.5} monitors. These monitors will be useful in distinguishing between impacts from windblown dust (generally PM₁₀) and wildfire smoke (generally PM_{2.5}). The first monitor of this type was installed at the District's White Mountain Research Center/NCORE station in October 2017. The second was installed at the District's new Lee Vining monitoring station and began operation in April 2018. Monitors of this type will be installed at the District's Mammoth Lakes, Lone Pine, and Keeler monitoring stations later this year.

The District has received funds through the California State Assembly Bill 617 Community Air Protection Program for monitoring in underserved communities. The District plans to install low-cost Purple Air particulate matter (PM) monitors at schools throughout the District that are located in communities where the District has no permanently-installed monitoring station. These monitors will provide real-time data for District staff and the public and will be used to characterize particulate matter impacts on children attending those schools.

Mitigation of Areas of Concern

The District has been involved in ordering the mitigation of the Owens Lake and Mono Lake dust source areas, as evidenced by the promulgation of the 2016 Owens Valley Planning Area

State Implementation Plan (April 13, 2016) and the 1994 Mono Basin Planning Area State Implementation Plan (May 1995). The Coso Junction PM10 Maintenance Plan was promulgated in 2010 to address PM10 concerns of a more localized nature in the Rose Valley. The Coso Junction area typically is impacted by PM10 emission sources from the north, including those from Owens Lake. Mitigation of all of these PM10 source areas is progressing. The Owens Lake mitigation was to be completed by December 31, 2017. Mitigation of the emissions from Owens Lake is driven by District Rule 433: Control of Particulate Emissions at Owens Lake. The Mono Basin mitigation is planned for completion by 2033. The Coso Junction Planning Area is in attainment for the federal PM10 standard.

Health Advisory Sign Up

Please fill out the following information to begin receiving email and/or text message health advisories for poor air quality events caused by dust or smoke.

If you have signed up previously, signing up again will overwrite you previous preferences.

Who are you?

First Name

Last Name

I would like to receive email advisories.

email@address.com

I would like to receive text message advisories.

Phone number: 123-456-7890

I would like to receive the following types of advisories:

Dust

☐ Bishop ☐ Mammoth Lakes ☐ Keeler ☐ Olancho
☐ Lone Pine

Smoke

☐ Inyo County ☐ Mono County ☐ Alpine County

[Sign me up](#)

You can unsubscribe from any or all of the advisories at any time.

[Having Trouble?](#)

Figure 3.1 Health Advisory Sign-Up

Great Basin Unified Air Pollution Control District

Dust Alert

May-11-2018 7PM to 8PM

The following locations are experiencing poor air quality

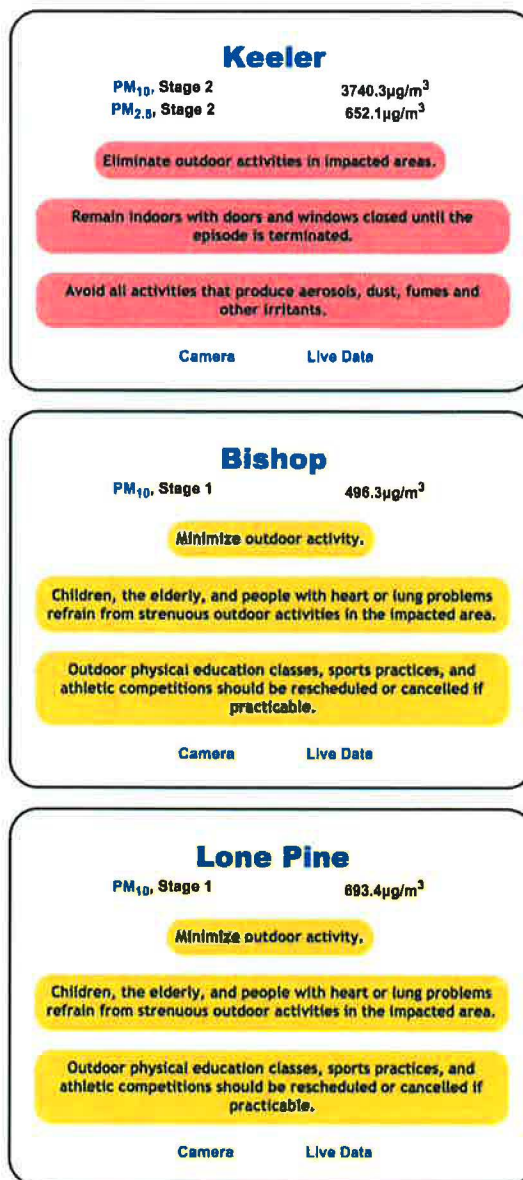


Figure 3.2 Dust Alert Notification

Exceptional Events Mitigation Plan - Coso Junction Planning Area – September 2018

Great Basin Unified Air Pollution Control District

Spillway Fire

Stage 2 Health Advisory

Affected Communities: Lone Pine

Smoke Source: Spillway Fire

Based on air pollution levels at the Lone Pine PM10 monitor from 4:00 pm to 5:00 pm on April 19, 2018 a Stage 2 Air Pollution Health Advisory has been issued for Lone Pine.

A Stage 2 Health Advisory recommends that everyone refrain from strenuous outdoor activities in the impacted areas.

Smoke conditions may change quickly. If you have any questions please visit: <http://gbuapcd.org> or call the Great Basin Air Pollution Control District office in Bishop at 760-872-8211 during regular business hours.

Health advisories on the web: <http://gbuapcd.org/AirMonitoringData/HealthAdvisories/>

Current Smoke Information

Information on all smoke events being monitored in the District: <http://gbuapcd.org/csq-bin/smoke/>

Recommendations for Outdoor Physical Activity during Smoky Conditions

This guide is intended to help you make decisions on outdoor activities when it's smoky outside.

Group information is listed below.

Length of Outdoor Physical Activity	Good for Everyone (5 - 10)	Moderate for Group 1 Individuals	Unhealthy for Group 1 & 2 Individuals	Unhealthy for Group 1 & 2 Individuals	Very Unhealthy for Group 1 & 2 Individuals	Extremely Unhealthy for Group 1 & 2 Individuals
	Visibility > 10 miles	Visibility 5 - 10 miles	Visibility 3 - 5 miles	Visibility 1.5 - 3 miles	Visibility 1 - 1.5 miles	Visibility < 1 mile
30 Minutes	No Restrictions	Group 1 Individuals should monitor or reduce physical activity.	Groups 1 & 2 should limit time spent outdoors or reduce physical activity.	Groups 1 & 2 should wear the mask and Group 2 should reduce physical activity.		
1 Hour	No Restrictions	Group 1 Individuals should monitor or reduce physical activity.	Groups 1 & 2 should considerably limit time spent outdoors and reduce physical activity.	All Groups should avoid the outdoors and physical activity.	All Groups should avoid the outdoors and physical activity.	All Groups should avoid the outdoors and physical activity.
2 Hours or More	No Restrictions	Group 1 Individuals should limit prolonged physical activity.	Groups 1 & 2 should avoid the outdoors and Group 3 should reduce physical activity.			

WHICH GROUP ARE YOU IN?		
Group 1 Individuals	Group 2 Individuals	Group 3 Individuals
This group includes those with respiratory or heart disease, asthma, pulmonary disease, asthma, emphysema or any other disease that may be impacted by any level of smoke.	This group includes those with asthma, or recent respiratory infections, those who experience seasonal allergies, work outside, or in general are more sensitive to the acute effects of smoke.	This group includes those who are more resistant to the short term effects of smoke. Healthy people may also experience adverse effects of smoke depending on duration and exposure.

Great Basin Unified Air Pollution Control District



Figure 3.3 Wildfire Smoke Notification

4.0 Mitigation Plan Review

This exceptional events mitigation plan has been presented to the public for the statutory 30-day public review period before submittal of the plan to the California Air Resources Board and US EPA Region IX for approval. As additional exceptional events occur requiring submittal of a mitigation plan, the document will be revised, presented to the public for the 30-day review and then submitted to the ARB and the EPA for approval. Subsequent review of the mitigation plan will take place every five years.

Phillip L. Kiddoo
Air Pollution Control Officer

GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT



157 Short Street, Bishop, California 93514-3537
760-872-8211 Fax: 760-872-6109

NOTICE OF PUBLIC COMMENT PERIOD GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT EXCEPTIONAL EVENTS MITIGATION PLAN COSO JUNCTION PM10 PLANNING AREA 2018

The Great Basin Unified Air Pollution Control District (GBUAPCD) has made available for inspection and public comment its *Draft Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area 2018* (Draft EEMP 2018) in accordance with Title 40 of the Code of Federal Regulations Part 51.930. Copies of the Draft EEMP 2018 and supporting documents may be obtained from the GBUAPCD at 157 Short Street, Bishop, California, and at the District's website, www.gbuapcd.org, under "What's New." Written comments received by 4:00 p.m. on Thursday, August 9, 2018, will be included in the staff report provided to the Governing Board of the GBUAPCD at its regular Board meeting on September 6, 2018, at 10:00 a.m. at the Mono County Board of Supervisors Chambers, Mono County Courthouse, 278 Main Street, Bridgeport, California.

Oral comments will also be taken at this meeting. All written comments must be received by 9:00 a.m. on Thursday, September 6, 2018, to be included in the staff report presented to the U.S. EPA for their consideration and action. Comments on the plan should be sent to Mr. Phill Kiddoo, Air Pollution Control Officer, GBUAPCD, 157 Short Street, Bishop, CA 93514. Comments may also be submitted by e-mail to pkiddoo@gbuapcd.org. For further information, contact Mr. Chris Lanane, Air Monitoring Specialist, at (760) 872-8211.

2018-07-25

Publication Dates

Inyo Register	July 31, 2018
The Sheet	August 4, 2018
Tahoe Daily Tribune	August 3, 2018

Mail List:	Public Notice
------------	---------------



CUSTOMERS FIRST

Eric Garcetti, Mayor

Board of Commissioners

Mel Levine, President

William W. Funderburk Jr., Vice President

Jill Banks Barad

Christina E. Noonan

Aura Vasquez

Barbara E. Moschos, Secretary

David H. Wright, General Manager

August 9, 2018



Mr. Phillip L. Kiddoo
Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, California 93514-3537

Dear Mr. Kiddoo:

Subject: Great Basin Unified Air Pollution Control District's Draft Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area 2018

The City of Los Angeles acting through the Department of Water and Power (LADWP) appreciates the opportunity to comment on the Great Basin Unified Air Pollution Control District's (District) Draft Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area 2018 (Draft Mitigation Plan). As discussed below, the Draft Mitigation Plan recognizes that exceedances in the planning area are due to events that are "natural," and therefore not reasonably controllable or preventable, and that mitigation should focus on reducing public exposure to windblown dust if future events occur. LADWP appreciates the District's recognition that exceptional events occur in the area and that it has taken steps to seek relief from federal regulatory action for the exceedances of the National Ambient Air Quality Standards due to the existence of exceptional events. LADWP also continues to encourage the District to apply the exceptional events policy to other natural events in the Owens Valley PM10 Planning Area. Additional comments regarding the Draft Mitigation Plan are as follows:

- In Section 1.0, the District states: "PM10 air quality exceedances caused by flash flood events fall under the category of a natural event." Flash flooding routinely occurs throughout the Great Basin, creating new silt deposits on alluvial fans and the valley floor. The Draft Mitigation Plan recognizes that such activity is a natural process and can cause (and by extension, contribute to) windblown dust events.
- Table 2.2 in the Draft Mitigation Plan presents all exceedance days at Coso Junction from 2012-2017. The last column, "Source," separates the events into two categories, "OL," (i.e., originating from Owens Lake) and "Non-OL"

Mr. Phillip L. Kiddoo
Page 2
August 9, 2018

(i.e., not originating from Owens Lake). This is based solely on the direction of the prevailing winds at the time of the event and disregards the sources of dust presented in Figure 1.2, showing mudflow deposits completely surrounding Coso Junction, even though these same mudflow deposits are considered the source of emissions on "Non-OL" days.

- In Section 2.0, the District states: "Air pollution in the Coso Junction Planning Area is dominated by windblown dust transported from Owens Lake." This is contradicted by Table 2.2, in which the District attributes only 3 out of 10 exceedance days to Owens Lake since 2012. The District's conclusory statements about the dust at Owens Lake not only ignore LADWP's tremendous efforts towards dust mitigation but also ignore that these events are also natural and should be treated similarly as to the events at Coso Junction where the District has acknowledged that the exceptional events policy should apply.

Again, thank you for the opportunity to submit these comments and LADWP looks forward to working with the District to identify other natural events in the Great Basin. If you have any questions, please contact me at (213) 367-1138.

Sincerely,



Nelson O. Mejia
Manager of Owens Lake Dust Mitigation Program

LC:jm

Phillip L. Kiddoo
Air Pollution Control Officer



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: September 6, 2018

To: District Governing Board

From: Chris Lanane, Air Monitoring Specialist

Subject: Adoption of Exceptional Events Mitigation Plan for the Coso Junction
PM10 Planning Area

Summary:

The Coso Junction area has been impacted by PM10 several times since flash flooding events in 2013. Silts and soils were deposited on the floor of the Rose Valley from these down-slope storm-driven flash floods. Impacts from these events have resulted in exceedances of the Federal PM10 standard. Since the Coso Junction Planning Area is in attainment for PM10, these exceedances are required to be addressed either by mitigation or by determining them to be exceptional events. An exceptional event is defined by the United States Environmental Protection Agency (EPA) as one that is "not reasonably controllable or preventable."

Federal regulations require the Great Basin Unified Air Pollution Control District (District) to "develop a mitigation plan for areas with historically documented or known seasonal events..." (Title 40 Code of Federal Regulations, Part 51.930(b)). This plan is to contain: a public notification and education program for the affected communities; include steps to identify, study, and implement mitigating measures; and provide for the periodic review and evaluation of the mitigation plan. The District has developed such a plan for public review (Attachment 1).

The District made the plan available for public comment beginning July 31, 2018, for the 30-day statutory public inspection period in accordance with Title 40 of the Code of Federal Regulations, Part 51.930(b)(ii)(iii)(A)(1). Legal notices were published in the Inyo Register, the Sheet, and in the Tahoe Daily Tribune beginning on July 31, 2018. The document was available on the District's website and at the District's Bishop office for inspection July 31, 2018.

On August 9, 2018 the City of Los Angeles Department of Water and Power submitted comments on the District's noticed July Draft Mitigation Plan (Attachment 2). In consideration of these comments, revisions (highlighted in yellow) were made to the Mitigation Plan for the Board's review and adoption (Attachment 3).

The revisions to the Mitigation Plan are summarized below:

- Figure 1.1 updated to reflect 47.8 square miles of PM10 dust control areas at Owens Lake as of January 1, 2018.
- Recognition of the significant reductions of Owens Lake PM10 emissions impacting the Coso Junction Planning Area as a direct result of the City of Los Angeles Department of Water and Power's Owens Lake Dust Mitigation Project.
- Table 2.2 PM10 Monitored Exceedance at Coso Junction updated to reflect only the source wind direction at the time of the PM10 exceedance event with removal of the Owens Lake and Non-Owens Lake designations.

The public inspection period will close on September 6, 2018, upon conclusion of the Board meeting. As required by regulation, all comments received by that time, along with District responses to those comments, will be submitted to the US EPA Region IX Administrator along with the Mitigation Plan.

Fiscal Impact:

None.

Board Action:

Staff recommends the Board adopt the District's Exceptional Events Mitigation Plan (Attachment 3) for the Coso Junction PM10 Planning Area for submission to the California Air Resources Board and the United States Environmental Protection Agency Region IX Administrator for approval.

Attachments:

1. July 2018 Draft Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area
2. Comments from the City of Los Angeles Department of Water and Power on the District's July 31, 2018 Noticed Draft Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area
3. August 2018 Draft Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area

Phillip L. Kiddoo
Air Pollution Control Officer



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537
760-872-8211 Fax: 760-872-6109

B/O #180906-05

September 6, 2018

I HEREBY CERTIFY that at a regular meeting of the Great Basin Unified Air Pollution Control District Governing Board held in Mono County Board of Supervisors Chamber (2nd Floor), Mono County Courthouse, Main Street (Highway 395), Bridgeport, California 93517 on September 6, 2018 an order was duly made and entered as follows:

AGENDA ITEM #5: ADOPTION OF EXCEPTIONAL EVENTS MITIGATION PLAN FOR THE COSO JUNCTION PM10 PLANNING AREA

A motion was made by Kingsley and seconded by Totheroh adopting the District's Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Area for submission to the California Air Resources Board and the United States Environmental Protection Agency Region IX Administrator for Approval.

Ayes: Board Members – Kingsley, Stump, Griffith, Totheroh, Rakow


Noes: Ø

Abstain: Ø

Absent: Board Members – Wentworth, Corless, Hames

Motion carried 5/0 and so ordered.

ATTEST



Tori DeHaven, Clerk of the Board