

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

March 2021

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Do applications for pesticides increase during certain months of the year that increase exposures to our communities?	There are trends. Our applications tend to pick up in the fall – September, October, November – we have quite a few applications. I think that is our peak. We still have a lot in the winter to control winter pests, but the applications are fewer. In the spring, we have another peak. You can generalize that the pests you see in your own home, can be seen in the field as well.	Ag Commissioner's Office	3/10/2021
2. Are there any waivers or exceptions on current pesticide use in our communities for those pesticides that are scheduled to be banned or outlawed – but are still being used?	I'm not aware of any waivers for banned pesticides. Chlorpyrifos was recently unregistered, and there's no waivers for use. In fact, you are not even allowed to possess it anymore in California. There are always pesticides that are under scrutiny at a state level, but none that are being phased out or banned.	Ag Commissioner's Office	3/10/2021
3. Does the Ag Department have any concerns regarding field burning of fields that have had pesticides applied and air quality?	We don't regulate field burning at all, that goes to the Air Pollution Control District. In practice, I would think that before they burn a field, they're not applying pesticides because it is an additional expense that would just get burned off. I don't think it's common practice. It's not something that has come up that I am aware of.	Ag Commissioner's Office	3/10/2021
4. When you talk about pesticides, is it all inclusive – herbicides, fertilizers and other chemicals that are used on crops – or are there other things?	No, it does not apply to everything. Pesticides are defined in code and it does not include fertilizer. Fertilizer is not regulated by our office. Yes, herbicides, insecticides, fungicides – even your household cleaners like bleach and antibacterial are considered a pesticide as well. If it has a U.S. Environmental Protection Agency registration number, generally, it is a pesticide.	Ag Commissioner's Office	3/10/2021
5. Does the Ag Commissioner's Office enforce anything related to runoff from the fields?	There are rules. It involves pesticide-specific on the labels for certain pesticides. You can't apply them while there's water running off. Later, when you irrigate the fields, there might be residues that are getting in the water. The Department of Pesticide Regulation conducts surface water sampling and	Ag Commissioner's Office	3/10/2021

	testing. If we get a report of that happening – and it usually comes in the form of someone reporting a fish kill or something like that – we will investigate. If it is determined that the runoff came from an application, then we will absolutely enforce action against the applicator of that job.		
6. Does the Ag Commissioner’s Office have any contacts for farm labor buses that pick-up laborers in Calexico? The Transit Commission is hoping to include them in the near future transit center being built in Calexico.	The office registers all of the farm labor contractors operating in the County, so we could provide a list of farm labor contractors. We don’t have specific information on the buses or transportation in general, but I think you could probably get it individually from the contractors. You can email agcom@co.imperial.ca.us and address it to Rachel and I will provide that information.	Ag Commissioner’s Office	3/10/2021
7. Does Ag Commissioners office monitor legacy locations, such as PureGro or other locations like that?	I think it is the California Department of Toxic Substances Control (DTSC) and the Imperial County Certified Unified Program Agency (CUPA) that monitor that. We are aware of the current pesticide dealers, but we don’t keep records on older locations. We only keep 5-10 years’ worth of records. We inspect current licensed and registered pesticide dealers.	Ag Commissioner’s Office	3/10/2021
8. Does the California Department of Food and Agriculture regulate fertilizers in California?	Yes, they do. The Ag Commissioner’s office doesn’t get involved in that program, but we do refer fertilizer, manure and other types of compost issues complaints to them.	Ag Commissioner’s Office	3/10/2021
9. What is the most frequent violation the Ag Commissioner’s Office finds in the fields, for example leaks or spills?	It varies on the type of inspections. For example, in pesticide use monitoring inspections, label violations are the most common – violation of Food and Ag Code 12973. When we preform the headquarters inspections, it’s usually paperwork related to respiratory record-keeping or failure to maintain those records. For field worker safety inspection, it’s usually some kind of misinformation on required paperwork by Department of Pesticide Regulation that is not on site.	Ag Commissioner’s Office	3/10/2021
10. The Ag Commissioner’s Office mentioned that sometimes there are spills in the New River. When you detect the spill in the New River, who is it reported to? Who has jurisdiction?	Let me clarify that we do not sample from the New River. We sample the field and any adjacent immediate areas. The California State Water Resources Board and California Department of Toxic Substances Control might be the ones that do that, but I am not sure.	Ag Commissioner’s Office	3/10/2021
11. Is there an 1-800 number for companies that have been storing pesticides and chemicals for years? How do you destroy them?	Household hazardous waste operate locally, and they will take pesticides from homeowners. They require it to be labeled. As long as you are in one of the cities that contracts with them, they take it off your hands at no charge.	Ag Commissioner’s Office	3/10/2021

12. How much easement does the railroad have on either side of the railroad tracks?	It varies. We measure it from the edge of the outside rail – in some cases it’s 100-foot right-of-way and others 60 feet. It is not always consistent, but if you give me specific areas, I can tell you. It is normally at least 25 feet, which leaves enough space for trucks that provide maintenance.	Union Pacific	3/10/21
13. Did Union Pacific submit a report to the Office of Emergency Services, even though there was not spill?	Whenever we have a derailment, we submit reports to a number of agencies, including the Public Utilities Commission. Everything has to be inspected to make sure that there was no spill or damage. I think they did.	Union Pacific	3/10/21
1. If Union Pacific did report to the Office of Emergency Services, can you please come back and update the CSC? Why are the rail cars still sitting on the East side of Central, between Main and Orange in El Centro?	Yes, once I confirm I can come back and report to the CSC.	Union Pacific	3/10/21
2. Is the same analysis presented at the March 2021 meeting available for all of the IVAN monitors laid out in summarized format?	CCV conducts the preliminary analysis specifically for AB617 meetings. We are working on a re-design of IVAN to be able to include Tableau, which is the tool that is helping me show these findings. We hope that will be available for all the monitors that will be live. Using Tableau, we would be able to, for example, help you compare what was happening in a certain location.	CCV	3/10/21
3. In the slide showing preliminary findings, has that been correlated to high wind events or high occurrence of PM2.5? Have there been any analyses done on that?	This is preliminary and we are just looking at community air quality levels, which is the guide used by IVAN, developed by the Imperial Project. I have not gone back to correlate those events to high elevations. We could go back and do that. I think the California Air Resources Board would be interested in that.	CCV	3/10/21
Public Comments			
N/A			

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

February 2021*

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Do we have air quality monitors within proximity to these schools for the air filtration systems?	Yes. For example, in El Centro we have a regulatory monitoring site on the roof of our building. There are also multiple IVAN monitors situated throughout the corridor – both existing and new ones that we are trying to get online.	ICAPCD	2/10/2021
2. Have you selected a location for the New River monitor or is that still to be determined?	When we put out the request for proposal (RFP), we did not want to specify a location, knowing that there would be some back and forth between the company and working with other agencies and the City of Calexico. We will make these decisions as we move forward with the contract to determine a location based on proximity and security. We will bring that information back to the AB617 Community Steering Committee (CSC).	ICAPCD	2/10/2021
3. What is the length of time that the New River monitor will be in place? Will it be in a single location only or will it move to multiple locations?	We drew up the request for proposal so we could get a sense of what the impacts are on the New River. This will be at one location unless we run into issues or situations during the study. The location is near the New River. The length of time we plan to keep it at that location to capture the various seasonal months would be from summer to winter of this year – 6 months in total.	ICAPCD	2/10/2021
4. Is it possible to create a sub-committee of selective CSC (Community Steering Committee) members now that we are moving forward with this process for Sonoma Tech?	We have subcommittees written into the bylaws, so, yes, we can look at that. We can also keep everyone involved on an ongoing basis.	ICAPCD	2/10/2021
5. Did the CSC get the opportunity to see the submitted request for proposal (RFP) for the New River in its entirety?	Yes, we had the full RFP on both the AB617 and the Air Pollution Control District's websites. When we sent the packets out last week, we invited community members to see the full proposals. If anybody wants a copy of that, please let ICAPCD know, and we will be happy to e-mail that and any related documentation.	ICAPCD	2/10/2021

6. Which equipment from the New River proposal can also be used in the future to measure pesticides emissions?	We did put in another category in this RFP for pollutants that we can pursue and look at in the future.	ICAPCD	2/10/2021
7. Will all equipment used for the New River monitoring, aside from single use samplers, be owned by ICAPCD?	As we can see in the RFPs, some of this equipment will be owned. Some equipment, such as PCV equipment will be rented out.	ICAPCD	2/10/2021
8. Can additional equipment be installed for New River monitoring, with the understanding that pesticides will be inevitable pollutant that may and should be a priority?	When we select a company for the New River proposal, one of the things that we will see are hazardous air pollutants. Depending on the levels found in the analyses, we can draw conclusions and see if there are any concerns revolving around pesticides contaminating the New River area and if it is affecting the health of our residents – whether it be Calxico or the County.	ICAPCD	2/10/2021
9. Are we just asking for the companies to prepare a New River project and not moving the monitors in the future for future projects?	We wanted to make this proposal and get this equipment off the ground at one location that makes sense for what we want to be looking at on the New River. We will concentrate on certain pollutants and get further data to fill in the gaps on what impact the New River has on the community. This is basically an extension of all the discussions we had regarding Mobile Monitoring.	ICAPCD	2/10/2021
10. How soon can any of these New River monitors be up and running?	Based on the proposal and on the RFP that was put out last year, we want to get this project up and running by July – maybe August at the latest.	ICAPCD	2/10/2021
11. Regarding the Paving Project for the High School on Highway 98, are there are budget considerations for additional trees or greenery and not just the paving of the lot?	The committee needs to look at what we can fund through our different mitigation categories. The CSC to address the paving for particulate matter emissions. In the future, we can highlight greenery to compliment a project such as this.	ICAPCD	2/10/2021
12. What is the difference between the suggested sites that are highlighted red versus blue for the Community Air Monitoring?	The sites in red are the ones that I’ve mentioned we already have monitors near them. Initially, we discussed the issue of saturation of monitors in certain areas (1-1.5 miles from each other). The sites in blue are ones where we don’t have monitors yet. For example, in Heber, we only have one at Heber school.	CCV	2/10/2021

<p>13. In terms of the Preliminary Analysis – Calexico, are we aware of what is causing the changes in those months where the data is showing more definite red markers? I know that there are a lot of seasonal workers from September through April. [Community Air Monitoring Update]</p>	<p>They are very different locations, so we can't attribute it to one thing. You can see the north end of Calexico and the West end of Calexico; it can be two different things that we are capturing. I would not attribute it to seasonal workers – there could be other factors. If we want to quantify which pollutants are in that area, the CSC can propose another project to find that out because there are ways to filter sampling and find out what is in those particulates.</p>	<p>CCV</p>	<p>2/10/2021</p>
<p>14. Regarding the Alleyway Paving Project, if the AB617 funds get applied to every one of these projects and then get reimbursed, will those be two different transactions? Will the AB617 continue to be able to make decision on what happens to those reimbursed funds?</p>	<p>I don't know if our AB617 funds can be used for this purpose, but it can help facilitate the activity. It would show smart leveraging of our partnership. If we are able to do this with support from CARB (California Air Resources Board) and CSC, the AB617 funds managed by the Air District would pay for Phase I – around \$1 million dollars for paving alleys to reduce PM10. The second transaction would be specifically reimbursed back to the AB617. There would be a loss of interest on AB617 funds.</p>	<p>ICAPCD</p>	<p>2/10/2021</p>
<p>Public Comments</p>			
<p>How are the readings from the AB Monitors compared with the close monitors from Air Pollution Control?</p>	<p>We haven't done a 1-to-1 comparison with any of the AB617 regulatory monitors that we have installed. If that is something that the CSC is interested in, we can connect with APCD to discuss that.</p>	<p>CCV</p>	<p>2/10/2021</p>

***There was no AB 617 CSC Meeting held in January 2021.**

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

December 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Do we have any type of monitoring when we have these atmospheric events - either at feed lots or composting sites - where it's an exceptional event when something happens in the atmosphere and things linger?	We have five (5) Air Pollution Control District monitors around the valley. We also have the IVAN monitoring network that is being expanded through the AB617 corridor. I believe those monitors are up and running in the Heber area corridor.	ICAPCD	12/17/2020
2. Does that haze - where you can smell it, but are unsure what it is - occur at composting sites and what is that airborne thing?	Those smells do not only occur at composting operations. They also occur at other operations and those are odor/nuisance complaints. We do accept complaints for those, but that it not really our area of governance on the nuisance. If anyone from the public has any concerns - whether from the feedlot or other sources - feel free to call our office and report it and we will open an investigation. We are required to respond to those concerns within 24 hours.	ICAPCD	12/17/2020
3. Is there any type of monitoring of what the haze contains, in terms of airborne particulates?	Yes, we do monitor that haze. For example, if you look towards the south and you see the haze, that is PM2.5, which is captured on the PM2.5 monitors. This is PM2.5 being produced by neighbors in the south. In the summer, it is ozone. Those are also captured by California Air Resources Board and the Environmental Protection Agency.	ICAPCD	12/17/2020
4. What equipment can be purchased where both the regulators and the community can share learning on air measurements?	We have talked about some toxics monitoring around the New River and perhaps moving those blockers further north to along the Salton Sea and capture some of these areas along the way. Those are the type of toxics monitoring that we are talking about doing through a contract with the AB617 funding. I don't know if we're going to be able to do any other mobile monitoring or mobile monitoring platforms. I believe there's been discussions in the past of methane. CCV is involved with some methane monitoring	ICAPCD	12/17/2020

	development. Ideally, some low-cost methane monitoring development		
5. How do you move forward with rulemaking while addressing emissions? What has been the process behind this policy? Land use is an element of the blueprint.	<p>The county has a second department, and they have a standard notification process and public hearing process, no different than what happened with this composting rule. During COVID, it has been difficult to get word out about these hearings.</p> <p>We recognize that land use is a big issue we are seeing withing these communities. However, there isn't anything within statute that brings in those land use agencies into the requirements that are outlined in statute. We need to see how to bring those agencies into the process and bring them into the conversation from the beginning so that they can see the issues that the communities are raising concerns about and, subsequently, figure out how to include those in plans that they are developing.</p>	ICAPCD/CARB	12/17/2020
6. Do you have updates on eligibility for other communities in Imperial Valley that could benefit from participating in AB617?	We received a response that that the rest of the Imperial County that we submitted, with a focus on the areas in and around the Salton Sea, were not accepted. We will provide more information in the February 2021 presentation.	ICAPCD	12/17/2020

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

November 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Why isn't McCabe school on the Flag program?	There are other schools that haven't been able to participate in the school flag program for different reasons, including funding or, at the time, willingness from the school to participate. Currently there are 24 schools in the SFP, under different programs at CCV not under AB617 yet.	CCV	11/18/2020
2. Approximately how much Year One funding do we have left to continue doing Tier One and Tier Two projects?	Looking at what we have available, discounting certain administration money that can be taken out of there, we have flexibility to see how we can run that program. The only funds we have taken from that \$7.9 million, to date, have been paying out the cost of the Pavement Project at Calexico High School – that was between \$200 and \$300 thousand. We also used a larger portion, approximately \$97,000. We are looking at about \$300,000 deducted from the \$8 million. So, there are, overwhelmingly, a large majority of those funds to be used.	ICAPCD	11/18/2020
3. Do any of these projects or existing projects originally had landscaping requirements? That's something where we might be able to take into consideration bridging the greening and paving.	<p>We have significant funding to do these projects. ICAPCD has expressed the desire to get the input into CARB to get this program moving sooner rather than later. Once we get it going, we should be able to roll it out in a much more aggressive manner.</p> <p>We do have an existing list of projects that have been done with asphalt paving – or some type of a pilot program. We can go back and revisit all those sites to revisit them for additional trees or urban greening or look at other sites for additional greening projects.</p>	ICAPCD	11/18/2020
4. Did I hear you say that all composting operations are 45 tons or less? If they are all 45,000 tons or less, what is the smallest and largest?	The smallest composting operation permitted with the ICACPD has an annual throughput of 15,000 tons per year and the largest has an annual throughput of 90,000 tons per year.	ICAPCD	11/18/2020

5. Did I hear that there are eight composting operations in our county? Are they all on feedlot sites or are they offsite?	There are a total of eight (8) composting facilities permitted by the ICAPCD. Seven (7) out of the eight (8) permitted composting facilities are located adjacent to a feedlot.	ICAPCD	11/18/2020
6. Who set the 100,000-ton limit? Does that come from some type of a scientific report/study/model?	<p>Every time the ICAPCD develops a Rule, we have to do a cost-effective analysis, which is what determines at what point it is cost-effective to require facilities to mitigate. In this case, any facility that has an annual throughput between 0 and 100,000 tons per year has to mitigate their VOC and ammonia emissions based on what we call "housekeeping control measures."</p> <p>Any facility that has an annual throughput greater than 100,000 tons per year, with the production being a lot larger, it would be cost effective for the operation to invest the capital cost on the foundation of control equipment.</p> <p>This is part of the record and can be found on the ICAPCD website.</p>	ICAPCD	11/18/2020
7. Are you saying that the San Joaquin Valley also has that 100,000-ton limit?	Yes, San Joaquin Valley Air Pollution Control District has the 100,000 ton per year limit.	ICAPCD	11/18/2020
8. When was Imperial County first required to implement either Rule 430 or a rule similar to this?	<p>Technically, it is not a requirement. When ICAPCD/Imperial County adopted the 2018 Annual PM2.5 State Implementation Plan, the ICAPCD committed to develop and implement a composting rule to bring additional emissions reductions to benefit Public Health.</p> <p>Imperial County has never required to do it; it was a measure determined to be cost-effective for Imperial County because we have composting facilities and the District committed to develop this Rule.</p>	ICAPCD	11/18/2020
9. How does the emissions reductions comport with Air Pollution Control District's 2018 State Implementation Plan for Imperial County annual standards?	<p>This question is directly linked to the footnote, reproduced here for convenience. Because of the information provided within the footnote the comment here originates with the assumption that:</p> <p>1) the calculated Ammonia levels are less in the Imperial County 2018 PM2.5 Plan (Plan) as compared to the calculated Ammonia levels for Rule 430, and</p> <p>2) SIP assumption included adoption in 2019 and implementation in 2020, thus no effect in 2020 and needing even additional reductions to meet SIP goals.</p> <p>"For example, "Current", "With Control", and "Reduction" NH3 levels are less under the SIP as compared to the</p>	ICAPCD	11/18/2020

	<p>County's estimates. Compare CARB (Apr. 2018) SIP, PDF p. 97-98 (https://ww3.arb.ca.gov/planning/sip/planarea/imperial/final_2018_ic_pm25_sip.pdf) with Item 22 Staff Report (supra fn. 1), PDF p. 39. So too, while the SIP assumed adoption in 2019 and implementation in 2020, Rule 430 will have no effects in 2020 and may require even additional reductions to meet the SIP goals."</p> <p>The comment ignores the analysis presented in previous pages of Chapter 5 which describe the Air District's Control Strategy, analyzed in accordance with the Clean Air Act (CCA) requirements, which concluded that with the exception of "wood burning devices", the current Air District rules along with state mandated rules satisfy the nonattainment requirement for the Annual PM2.5 Standard. In summary, the analysis looked at all sources, stationary, mobile and area sources, that emit direct PM2.5 emissions, looked at all the various control measures available for those sources, and identified which control measures were applied and which were not applied. The analysis identified only one control measure that had not been applied, the control for "wood burning devices". Thus, the only rule that would affect the SIP for attainment purposes was the non-adoption of a "wood burning device[]" rule. The Air District adopted Rule 428, Wood Burning Appliances, on September 11, 2018 and EPA approved the rule into the SIP with an effective date of September 30, 2019.</p> <p>Finally, the comment fails to consider the role that Additional Reasonable Measures (ARM) play within the scheme of the Plan. The modeling demonstrated that precursor emissions such as ammonia (NH3), and nitrogen oxides (NOx) were not significantly impacting PM2.5 levels. However, recognizing that these precursor emissions could affect ozone, the Air District chose to identify ARM rules that would assist in improving air quality within Imperial County. The Plan lists four ARM rules that although would not significantly contribute to nonattainment, their adoption would provide an added level of improvement to air quality thus added protection of the public health.</p> <p>Finally, all calculated reductions were based on current practices, i.e. the implementation of water management practices to control ammonia emissions. The corresponding AB 617 CSC Meeting FAQ: 2020</p>		
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	percentage used to calculate the reductions were derived from EPA's Control Techniques for Composting Operations. Thus, all assumptions for implementation and subsequently calculation of reductions do not affect the overall emission reductions necessary for attainment but rather, as page 97 (PDF) of the Plan explains, "[m]ore research may need to be done to determine the final reductions in ammonia emissions expected to occur due to this rule."		
10. How reliable is CARB's emissions inventory methodology, given it assumes a high volume of green waste?	The methodology was peer reviewed and recommended by both CARB and US EPA. The Air District concurred after lengthy discussions regarding the analysis. CARB and EPA modelling experts peer reviewed and concurred this was the best methodology to use.	ICAPCD	11/18/2020
11. How well does Rule 430 correlate with San Joaquin Valley Air Pollution Control, Rule 4565 South Coast Air Quality Management District, and Rule 1133?	The Air District reviewed those rules that the California Air Resources Board (CARB) identified in their Rules database. After review of each of the Rules, looking at the area's nonattainment status, classification of their nonattainment status, climatological and meteorological conditions, number and type of operations, and evaluating the purpose of each rule, the Air District in consultation with CARB and the United States Environmental Protection Agency (USEPA) concluded that the San Joaquin Rule 4565 would be best suited as a model rule. Thus, the Air District modeled Rule 430 specifically after the San Joaquin Rule 4565. Specifically, the South Coast Rule 1133 is an administrative rule creating a registration program without any mitigation measures. In addition, Rule 1133 rule exempts 7 types of composting including Agricultural and recreational composting.	ICAPCD	11/18/2020
12. What meaningful limitation is provided for the Recreational Facility exemption and what basis was used to determine that these emissions were not significant?	According to the South Coast Final Staff Report for the proposed composting rules and the San Joaquin Staff Report for Rule 4565, the exempt operations for recreational facility composting are "...generally conducted in small scales or do not cause inadvertent decomposition." While a cursory review of Imperial County Recreational Facility Composting yielded no results, according to the Local Enforcement Agency (LEA) these type of facilities are exempt at the State level because they are not producing the product commercially.	ICAPCD	11/18/2020
13. What management practice and technological options (example Table A and B, respectively) were not considered or deemed infeasible, including but not limited	All measures found in the San Joaquin Rule 4565 were deemed feasible and incorporated into Rule 430. This included all applicable test methods and/or source testing.	ICAPCD	11/18/2020

to measures addressing windrow composting methods?			
14. Beyond biofilter/in-vessel composting, what other technological options were considered that may be more effective?	All measures found in the San Joaquin Rule 4565 were deemed feasible and incorporated into Rule 430. Review of known technological studies by the South Coast AQMD and more generally through the United States Composting Council did not reveal any "...other technological options... that may be more cost-effective."	ICAPCD	11/18/2020
15. Why does the cost-effective study rely on a 13-year methodology employed by San Joaquin Valley Air Pollution Control District?	The methodology used to determine cost effectiveness is a standard method widely used by air districts in California. The air district used the same equipment cost from SJAPCD Staff Report because it was considered conservative and appropriate to be used in our cost-effective analysis.	ICAPCD	11/18/2020
16. What scientific basis supports the 100,000-wet ton per year throughput for more aggressive mitigation measures addressing active/curing composting activities?	<p>This question is directly linked to the footnote, reproduced here for convenience. The comment then is concerned that the APCD is acting for the benefit of industry over the public health.</p> <p>"Coincidentally, this threshold would exempt all existing composting facilities from more stringent standards, which suggests regulatory capture of the APCD that is acting in the benefit of industry over public health."</p> <p>Quite to the contrary. The 100,000 tons per year threshold was originally studied and examined by the South Coast AQMD in its technology assessment for Rule 1133. The initial review identified that those facilities 100,000 tons per year or more had an annual emissions of 89 tons/year of VOC, uncontrolled and 147 tons/year of ammonia, uncontrolled. The threshold in the final revision of the Staff Report was used only to identify the large facilities. In keeping with the concept first developed by the South Coast assessment, the Air District applied the concept as a threshold, addressing those facilities potentially emitting higher levels of emissions.</p> <p>To address the overall concern of the comment, that facilities smaller than 100,000 tons per year are not controlled, currently best management practices are in place in accordance with the USEPA and State standards. In fact, although BMP's are currently being practiced there is no regulatory framework to assure that these practices are maintained during the most emissive phases of the composting operation. Balance between keeping industry functioning and protecting the public health is accomplished</p>	ICAPCD	11/18/2020

	by the mitigation measures in Table A for facilities under 100,000 wet tons.		
17. What measures prevent operators from piecemealing operations at several facilities below the threshold to avoid more stringent mitigation measures?	According to Imperial County Rules and Regulations, contiguous or adjacent facilities are considered one facility and therefore limited to 100,000 tons per year threshold. In any event, regardless of size the facility will be required to implement BMP's.	ICAPCD	11/18/2020
18. How does Rule 430 change current measures under Rule 201, such that compliance with Rule 430 may avoid more significant reductions potentially available via Rule 201.	<p>This question is directly linked to the footnote, reproduced here for convenience. The comment then is concerned with the applicability of a Class 8 exemption under the California Environmental Quality Act (CEQA).</p> <p>"Such a case would make inapplicable a Class 8 exemption under the California Environmental Quality Act."</p> <p>First the ICAPCD Rule 201 Permits Required is an administrative rule and does not contain "regulatory measures," standards of performance or other requirements that provide for reductions. A Class 8 Exemption applies to those actions by regulatory agencies for the protection of the environment. Rule 430, as stated above is being adopted to further reduce air quality thus further protect the public health. The rule does not require construction activities nor does it relax and existing federal, state or local standards. For convenience CEQA Guideline section 15308 is reproduced here:</p> <p>"Class 8 consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment. Construction activities and relaxation of standards allowing environmental degradation are not included in this exemption."</p>	ICAPCD	11/18/2020
19. Heber Public Utility District Children's Park Tree Planting Project sounds like a good project. You don't have \$35,000 from one of your other funds to get this off the ground?	We are focusing on the corridor to break ground on this type of urban greening projects. We are very focused on getting other projects out the door. We are looking forward to breaking ground on this with the leadership of AB617 and the large amount of monies in that bank account at this time.	ICAPCD	11/18/2020
20. Are the projects being presented coming back to the agenda for the committee to take action at	ICPCD are sharing these proposals because these are proposals that we received from entities in the communities. We will not move forward with these projects until the	ICAPCD	11/18/2020

<p>some point? When should the members expect that?</p>	<p>project plans are approved by CARB. Once they are approved, we can open up the process to receive formal applications from projects such as this. ICAPCD will then give recommendations to this committee for approval.</p>		
Public Comments			
<p>21. Is there an agenda item regarding a tree project that the that Heber Public Utility District would like to start in Heber? [HPUD] sent the AB617 meeting a letter through APCD.</p>	<p>ICAPCD did receive the letter from HUPD and it is on the agenda packet for the committee. It is on our agenda to discuss that letter for that proposal for the greening project at Heber at the children’s park.</p>	<p>ICAPCD</p>	<p>11/18/2020</p>

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

October 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Do we have any noise pollution control in the county? This is not necessarily AB617 related.	We would like to bring that back later in the discussion so that we can have a more complete conversation and, possibly, add it as an agenda item.	ICAPCD	10/14/2020
2. Which companies were spared from Inspection and have they been inspected since?	One was a Sandblaster that was not in operation in 2019, so we couldn't inspect it. The other was an Emergency Generator that only operates 20-50 hours, at max, for maintenance and testing. We couldn't coordinate each station because it is an unmanned facility.	ICAPCD	10/14/2020
3. How do these complaints, violations and compliance rates compare to similar to Otay Mesa border area in San Diego?	CARB presented border inspection results for 2019 on the last CSC. For the same year, CARB conducted 1597 inspections in 26 border area locations for San Diego. The results show 1597 inspections with 1393 compliant results (87%), 161 emission violations (10%) and 43 non-emission violations (3%).	CARB	11/17/2020
4. What is your expectation regarding the trucks at the Port of Entry with Mexico? How will you be monitoring the new citations that you will be imposing? Are you going to have control of that?	On the slide titled "Heavy-Duty Diesel Vehicle Enforcement in 2019 Imperial County, there is a map. On the bubble to the right, it shows the inspections we do in the border area. So, that is a high priority spot for us. I can provide the link to the visualization tool; it will give you a better idea of how we keep track of the citations and the compliance rate. If you zoom in, you can see the specific location per year and the compliance rate per program. Every program keeps their own data and we put it together and upload it to this tool and it is available to the public.	CARB	10/14/2020
5. How do you plan to monitor idling for the school drop off? Will the schools be trained?	We can try to enforce that, but we don't have the authority. We can, however, help put those signs. We are working with Community Outreach and Enforcement	CARB	10/14/2020

	Section to develop guidelines and potentially provide training for schools and communities so we can help them implement the "No Idling Programs."		
6. Are you going to get students involved to bring awareness?	Yes, that is key. We will try to provide a more integrated program for that.	CARB	10/14/2020
7. Is there potential to reroute heavy-duty diesel that travel through Calexico?	Yes. I know that we got input back in 2019 from a workshop. Part of the strategies on this pilot is re-routing of those trucks. Hopefully when we have more structure, we can implement that. We will have to coordinate with other agencies. If CSC wants to work on re-routing, we won't have to wait for a pilot.	CARB	10/14/2020
8. Once a citation has been issued, is the amount of the citation reduced once the violator has created action to correct the measure?	<p>If it is an in-use citation with emissions impact, the amount is not reduced unless they qualify for a financial hardship. There are no reductions in penalty for any HDVIP citations (ECL, Tampering, and Smoking).</p> <p>If it is a minor violation without emissions impact and they provide corrective action within 30 days (example is labeling or reporting), then the citation penalty could potentially be waived. This only applies to Air Toxic Control Measure citations (STB, TRU, ORE, etc.).</p>	CARB	11/17/2020
9. How many schools currently have the Flag Program - both in the corridor and outside? I think before we start assigning those schools, we could have a presentation on this so it could be our baseline for where we're moving to.	Currently there's a total of 24 schools under the School Flag Program. There are seven (7) schools that have the School Flag Program in the AB 617 Community Corridor, there's also Meadows Elementary which is slightly off the corridor. These schools are currently implementing the Program under other existing programs and funders. Comite Civico del Valle provides training to school personnel to carry out the SFP objectives.	CCV	10/23/2020
10. In the CERP Project/Budget Commitments from our March 11, 2020 agenda, there were two separate items for the Flag Program. When I went to look at it, there was the Enhanced Flag Program, which was \$240,000.00 commit cost and the Flag Program Marquee and Installation for, I think \$400,000.00. Are we considering these as two separate projects?	The table of CERP Project/Budget Commitments from the March 2020 Community Steering Committee meeting agenda was presented to demonstrate potential ways in which the available AB 617 funds could be allocated to various project types based on strategies outlined in the CERP. The projects listed in the table for Enhanced Flag Program and School Flag Program Marquee and Installation would both serve the same strategy from the CERP, M-4: Expanded/Improved School Flag Program. This strategy is described in Chapter 4 of the CERP, stating "...the District is proposing to assist as many schools as funding permits in the Corridor in implementing the program. Specifically, the District would provide the materials and training necessary for successful	Ramboll	11/03/2020

	implementation... ..Under this strategy the District would also consider ways to enhance the school flag program, including the potential for use of electronic marquee signs." As the CERP describes it, this strategy was created to leave flexibility for the District and the Steering Committee to allocate funds towards projects to initiate or enhance existing flag programs with traditional materials (i.e., flags), electronic marquees, or both. Ultimately though, these are part of the same greater project type/CERP strategy.		
11. How do we balance out the schools that have more income versus the schools that have less income that derived for the School Districts?	Although that isn't listed as one of the Project Criteria, that is something we can implement. We would have to think about how to do that in a systematic way. I would be interested to hear if the rest of the Committee is interested in that.	Ramboll	10/14/2020
12. What is the process to submit an application to become CSC Member? Is it on the website?	The process of identifying and selecting members for the CSC is the responsibility of APCD and CCV, per the bylaws. We will send out to application to all the CSC members, so you can have it and point out to your contacts or your associates to join our CSC.	ICAPCD/CCV	10/14/2020
13. Can you please expand on the expansion of air purifier for homes? Are you expanding the Public Health program to provide air purifiers for homes with asthmatics?	Yes, we connected with the County Health Department. Implementing it has been challenging, due to the resources being zeroed in on the pandemic. We are looking to see how we can get this implemented in-house with APCD and CCV.	ICAPCD	10/14/2020
14. I saw that the Board of Supervisors approved the air purification for the home of patients with asthma. So, it was never implemented?	It was approved by the Board. We communicated with the Public Health Department about the funding in the Spring of this year. Since the Spring, the Public Health Department's resources have been utilized for the pandemic. We will look into that and note that. These funds were outside of the AB617 Program.	ICAPCD	10/14/2020

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

September 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Is there an opportunity to include contributions towards zero-emission transit buses?	The current project plans in development are related to existing strategies in your CERP. There is one strategy related to electrifying bus strategy, but it was related to school buses. If you are proposing identifying funding or partial funding for zero-emission transit buses, that would have to be captured under "Update to your CERP." That would be included as a new strategy because I don't think there's an existing strategy at this point.	Ramboll	9/14/2020
2. On the budget commitments, I recall we had about \$5 million set aside for the three items that you reviewed with us. Will we have a presentation for whether it will lead to strategies for those other 3 or 4 remaining items we identified in our budget commitments?	That is how the budget was put together and allocated; that does not mean that it is locked in stone. As we go forward, we can amend the CERP, which is the process that we are now beginning.	ICAPCD	9/14/2020
3. Is there a deadline to formally submit public comments on CERP updates so that they can be included?	We were tentatively planning on sharing draft plans with you all at next month's meeting and, ideally, we would receive that feedback, you know, probably in the next couple of weeks. But again, we can talk about that timeline, a bit more.	Ramboll	9/14/2020
4. Can we get a high-level survey out between meetings, including cost share versus no cost share, award criteria, etc.?	We would be happy to facilitate something like that so that we can get feedback from the community. I will circle back with the District, CCV and Harder + Company so that we can discuss how that gets rolled out.	Ramboll	9/14/2020
5. Does the State have information on what the budget allocations are going to be and is there more money expected in the 2020 budget?	My understanding is that there were implementation funds included in the budget for this program and it is a similar amount to what was provided last year. The CAP Incentive funds, which go towards the projects themselves, are dependent upon the sales. I believe that the calculated sales have to reach a certain amount before those funds would be available.	CARB	9/14/2020

6. Are there any expectations of how that is going to move forward?	We do not have those numbers yet or that kind of contract. Your assistance, knowledge and insight in these areas have been a key to try and maintain that we are getting the proper exposure and success of AB 617 for future budget allocation problems in Sacramento.	ICAPCD	9/14/2020
7. With the mobile monitor, would there be any need to monitor the PM?	We do have a number of monitors in the area that we can leverage that have a high-level analysis of PM10 pm PM2.5 in Calexico, as well as with the monitors that we have in the IVAN network that monitor PM. I am not entirely sure if we need that in the mobile monitor. Instead, we're recommending we use our money wisely and fill in the data gaps with parameters and pollutants that are not to be monitored at all in Calexico, as it pertains to the New River.	ICAPCD	9/14/2020
8. Will the mobile monitors be able to monitor methane?	I know this has been brought up from time to time, in terms of the entire corridor countywide from different sources. I'm not sure if we've discussed methane as it pertains to this project. I will defer to any discussion to the Co- Chairs and if anybody else wants to see us pursue this with this mobile monitoring platform.	ICAPCD	9/14/2020
9. Does the proposal for mobile monitoring include physically purchase equipment or is it just contract of service that will provide the equipment?	We have gone back and forth with the pros and cons, whether we are going to rent this out or purchase it. We are going to be looking at 6-month deployments. That is something that we're going to nail down between us and the Co-Chairs – whether we are going to go forward with renting the equipment initially of if we want to take on the higher cost initially and using it to further vocations and other projects down the line. We will have an update for you next month.	ICAPCD	9/14/2020
10. Now that you are in contacts with the Superintendents and the Principals at the schools, have you had a chance to talk to them about the air monitors? It would be a great opportunity to use those contacts to educate them about the marquees.	<p>It has been challenging to speak with the Principals because of their security measures. Sometimes we have to communicate via the maintenance person. The Principals seem very interested in helping the community in any ways that they can.</p> <p>The Flag Program is not something that Edgar Ruiz from CCV is working on. It's a good idea to try new things, but there are challenges. Not everybody wants to talk about air quality or pollution.</p>	CCV	9/14/2020
11. How are the Air Board and OCAP moving forward with an update at the CARB meeting? What is the update about? Did they consult with the CSC and environmental	We have a Board hearing on the 24 th of this month and it originally came about when our board considered the two reductions programs for the San Joaquin Valley back I February. At that time, the Board asked that there be a report back to the Board regarding those. Since then, it	CARB	9/14/2020

justice to ensure that that voice is present in the updates? Is it our message?	<p>was recognized that it might be an opportunity to do an initial report back.</p> <p>We are working with Air Districts and reaching out to Steering Committees now. We are going to the Board on the 24th, but that is just an initial discussion on implementation. The logistics are still being worked out as far as what we will be discussion and how the actual discussion will occur.</p>		
12. Can I propose that the El Toro Expansion is part of the agenda?	I did have a conversation with Matt Dessert, Co-Chair. It was well-understood that this was a limitation that the county would have. I did communicate it to John, but only to the extent of making that known. I did further clarify that I did have a conversation with the Chair as to whether the County Counsel was also referring to limitations to Comité Civico, stating that we would have a problem with that. This was the direction from the Council to the County Department – not a limitation of Comité Civico.	CCV	9/14/2020
13. If I had brought up these concerns as Co-Chair on behalf of a CSC Committee member, would that have eased the concerns with the County Counsel or is any agenda item regarding El Toro Expansion application a concern?	As Co-Chairs we put the agenda together, and we generally try to come to some type of consensus or agreement there. I believe the legal correspondence with the County Counsel, involves CCV, although I haven't seen it. These are tedious waters we are navigating now. We can still make successes in discussing this in general and planning out land use futures. But we should come to some type of agreement, as we have, about what the agenda items are and if there's a conflict of interest or if there's a concern over litigation.	ICAPCD	9/14/2020
14. How do we continue to respond to the CSC to concerns about the El Toro Expansion? Should this be something that, perhaps, needs more discussion with your legal?	<p>It should involve both Co-Chairs discussion, at a minimum. Legal counsel at the County and other legal counsels can be referenced to assist us, but this is something that you and I should handle together.</p> <p>At this point in time, it is anticipated. That is why there is no further information on this. What I would propose to Mr. Dessert in that conversation is that we have a 3rd person, unbiased, step in. It is a very common practice that when there is a conflict, you excuse yourself.</p>	ICAPCD	9/14/2020
15. Are we allowed to ask AB 617 to send us the public information that is already gathered about the El Toro Expansion?	We'll take that into discussion and doing everything we possibly can to follow through on both the comments from CSC members.	ICAPCD	9/14/2020

16. Aren't there already public documents from the Committee approval of the El Toro expansion, as well as the Planning Commission?	Yes, there is. We can put that together and make that information available, separate from an agenda item. We can do that for the Committee to educate them.	ICAPCD	9/14/2020
Public Comments			
17. Are maintenance costs included in urban greening projects, such as water to keep the projects alive for the long-term?	I suspect that they would only cover the up-front, one-time costs. I will have to investigate that and provide a response after the fact.	Ramboll	9/14/2020

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

July 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Are these guidelines in addition to what we already have outlined in our CERP?	Your community is one of the ones that we did not have guidelines in place on how to fund those certain measures that you developed with your Air District. Now that the framework is finally in place, we give you the project criteria that your project must abide by. They are minimal, but there are some guidelines that you have to follow to get those measures into actual projects.	CARB	7/15/2020
2. Will our CERP have to fit within these guidelines? Are there incentives, in addition, to something that is not yet in our CERP?	Your formation of the CERP is based on a blueprint. To get those projects funded, you are going to have to follow these guidelines. As far as additional funding, that goes into the allocations per year. If you develop your CERP measures and there's funding provided, you'll be able to use this guideline to fund those projects/measures.	CARB	7/15/2020
3. Is this a separate plan/application that needs to be developed and attached? Or is this something that can be done in a parallel path?	Yes, it will be a separate document that you will submit to CARB. We are requiring the Air District and the community to put together a project plan that takes elements out of the CERP and into a separate document.	CARB	7/15/2020
4. If there are future strategies added to our CERP, what is the flexibility to be able have a living document?	We developed this chapter to work in tandem with the CERPs as a living document. Any type of project that you add to your CERP will still be allowed to undergo this exact process. We intend this chapter to be used in perpetuity as long as there is a CERP program in place.	CARB	7/15/2020

<p>5. How is the living strategy to the guidelines going to continue to work together in the evolution of our local CERPs?</p>	<p>Another element of this process is that we are trying to engage all the districts that are involved in thinking about having projects that can apply to multiple communities. We are developing a webpage that will allow all the districts the ability to connect with other districts and see what other type of projects are going to be available as well.</p>	<p>CARB</p>	<p>7/15/2020</p>
<p>6. What is the timeframe about in the Mobile Monitoring Chart?</p>	<p>We requested that the consultants tell us how long it would take them to do an analysis of the New River. They said that to get a full analysis, they need 1 year of analysis to do that. Aerodyne provided a 2-year proposal, just in case, together with the 1-year.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>
<p>7. Is APCD staff going to make a recommendation on which proposal for mobile monitoring or is the hope here for all of us to weigh in on which one we prefer and that the committee hone in on the preferred applicant?</p>	<p>We are going to let this be on the Committee, based on proposals that we receive. We will be putting a document together with Pros and Cons for each proposal for the Committee to make a comparison.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>
<p>8. Can someone remind me why the trailer is significant? Why would we want it or why could we do without it?</p>	<p>There is no security for the standalone monitor we would have near the New River. In previous meetings, we discussed that maybe a trailer would be best because it will be enclosed and it would have solar, good security and AC/ventilation. Security is going to be very important, given the areas we have seen to place the monitor.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>
<p>9. Do you have any idea what the cost of the trailer is?</p>	<p>It varies. One of them is up to \$400,000. The trailer itself is going to \$200,000-\$250,000. It will depend on the size and amenities.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>

<p>10. Is there a write up that describes the job scope of the unit, goals, and length of use that we are needing the mobile monitor? I do not think we have the complete details of usage to be able to make fair comparison.</p>	<p>We have to find out ourselves what is needed out there. All these consultants bring different ideas. We are trying to streamline to see what to bring out there. We do not want just any type of analysis or monitoring that we're not going to be able to use for future projects/results. We will bring it back to table with all these questions to the consultants and see what is actually needed out there.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>
<p>11. I was looking through all this information and I see that there are a lot of pollutants that could be monitored via mobile monitoring. Could "more" be detrimental to what we are trying to achieve? It is not realistic keeping all this data for a year timetable.</p>	<p>I do not think more is best. We just need to focus on what is needed out there and that is what we are trying to find out. We know that PM monitoring and perhaps even older monitoring is out there. It also depends on what the equipment itself is capable.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>
<p>12. Are there opportunities to discuss mobile monitoring more in the future and perhaps have more education on the benefits of what we really want to focus on monitoring?</p>	<p>The research we have to do is not only the pollutants that we want to measure, but the equipment we will use.</p>	<p>ICAPCD</p>	<p>7/15/2020</p>

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

June 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. Can equipment/instrumentation function properly in high degree weather?	Not answered		6/17/2020
2. What is the timeline to get the best quality data at first location – New River?	It depends on many factors, such as availability of instrumentation, components that come from overseas, what is being measured and how long the monitoring will last.	Sonoma Technology	6/17/2020
3. Will the monitor from Sonoma Technology be able to identify high concentration emissions coming from the border?	Yes. In the past, these monitors have been able to measure toxic metals and chemical fingerprints of concrete/asphalt emissions.	Sonoma Technology	6/17/2020
4. Does Sonoma Technology have experience working with residents, community members and Air Districts?	Yes. Sonoma Technology is currently training residents in the Bay Area to change filter and they have worked with schools on how to use air sensors and interpret data.	Sonoma Technology	6/17/2020
5. How much would it cost for the project for Sonoma Technology?	ICAPCD is currently just reviewing proposals; a decision has not been made. About \$450,000 remains for mobile monitoring.	ICAPCD	6/17/2020
6. Can we have another presentation to discuss cost and plans for the Mobile Monitoring Platform?	It may be helpful to have an individual conversation with one of CSC members.	ICAPCD	6/17/2020
7. Can we also help plant edible fruit trees under the Calexico Urban Green Infrastructure Proposal?	Yes, but they would have to check with the City Attorney's office to define if areas would be leased out or if people could eat the fruit as they please.	City of Calexico	6/17/2020
8. What is the cost of the bamboo trees?	It is about \$150 per tree plus installation fee. They benefit is that they grow fast.	City of Calexico	6/17/2020

9. How can funds from AB617 be leveraged to enhance or expand these presented greening projects in Calexico and incorporate community residents to partake in them?	Selecting an organization that works well with the community and involving the community through Public Visioning workshop.	City of Calexico	6/17/2020
10. Does the Mobile Monitoring Platform cover the cost of infrastructure and maintenance cost?	The grant requested has money set aside for water using a recycled water system. It would be expensive to set up the infrastructure and recurring costs may be an issue in the future. This could be solved by forward thinking grant planning to makes sure that maintenance costs are covered or there is a major investment in purple pipe infrastructure.	City of Calexico	6/17/2020
11. Does anyone at CARB have status on AB617 funding about current fiscal state budget?	\$50 million in implementation funding (same as last year) was in the budget passed by the legislature. It is now on the Governor's desk, and it is possible that he will be doing line-item vetoes. However, for now, it is in the budget.	CARB	6/17/2020
Public Comments			
12. Is it normal for air pollution cameras not to update regularly? The camera on Brawley has not updated since Sunday, June 14 th .	There have been staff out in that area. The Air District will check the status of this.	ICAPCD	6/17/2020

AB617 Community Steering Committee Meeting (El Centro-Heber-Calexico)

Frequently Asked Questions

May 2020

Question	Answer	Answer Provided By	Date Question Asked
Community Steering Committee Members			
1. What would you say is the response from the [air monitoring] locations as far as the sector? Is that coming along or is there some added work that the committee needs to do?	Yes, the pandemic has introduced challenges with scheduling meetings with contacts at air monitoring locations. CCV encouraged committee members to contact CCV staff if they want to share contact information for anyone who lives nears those sites who is willing to facilitate a siting scenario.	Comite Civico Del Valle	5/13/2020
2. How much of the data collected by the monitors are going to be considered outliers, given the reduced traffic from the pandemic? And how has that affected out attainment ability?	Currently, that narrative of reduced traffic has not been captured by the monitors. This has been noticed more so in the community. It has not affected attainment; everyone is working hard to focus in the areas that have more health concerns, like asthma.	ICAPCD	5/13/2020
3. Money for trees. When is this going to be the priority for AB617?	The minimum funding for urban green projects is \$200,000. They have received three proposals, one being from the City of Calexico. They might open another RFP for more proposals.	ICAPCD	5/13/2020