AIR POLLUTION CONTROL DISTRICT

Approved by the Imperial County Air District Board/Board of Supervisors on October 8, 2019

IMPERIAL COUNTY YEAR 1 COMMUNITY EMISSIONS REDUCTION PROGRAM PLAN FOR THE EL CENTRO-HEBER-CALEXICO CORRIDOR

OCTOBER 2019

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Prepared for

Imperial County AB 617 Steering Committee

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Abbreviations and Acronyms

AB	assembly bill
ABERC	Agricultural Burning Emission Reduction Credit
AER	alternative emission reduction
APCO	Air Pollution Control Officer
AQS	Air Quality System
ATCM	airborne toxic control measures
ATV	all-terrain vehicle
BACM	best available control measures
BACT	best available control technology
BARCT	best available retrofit control technology
CAFO	concentrated animal feeding operations
CAL	community air quality level
CalEPA	California Environmental Protection Agency
CAPP	Community Air Protection Program
CAP	criteria air pollutant
CARB	California Air Resources Board
CCV	Comite Civico del Valle, Inc.
CEPAM	California Emissions Projection Analysis Model
CES3	CalEnviroScreen, Version 3.0
CEQA	California Environmental Quality Act
CH_4	methane
CO	carbon monoxide
CUPA	Certified Unified Program Agency
DMV	department of motor vehicles
DPM	diesel particulate matter
ECL	emission control label
ERC	emission reduction credit
FARMER	Funding Agricultural Replacement Measures for Emission Reduction
GHG	greenhouse gas
GMERP	Goods Movement Emission Reduction Program
GPS	global positioning system
HDVIP	Heavy-Duty Vehicle Inspection Program
HHDV	heavy heavy-duty vehicle
HPUD	Heber Public Utility District
HSC	Health and Safety Code
ICAPCD	Imperial County Air Pollution Control District
IVAN	Identifying Violations Affecting Neighborhoods
LCFS	Low Carbon Fuel Standard
LDV	light duty vehicle
LHDV	light heavy-duty vehicle
MHDV	medium heavy-duty vehicle
NAAQS	National Ambient Air Quality Standards
NH_3	ammonia

NO_2	nitrogen dioxide
NOV	notice of violation
NRM	NOx Remediation Measure
NSPS	New Source Performance Standards
NTC	notice to comply
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHV	off-highway vehicle
Pb	lead
PERC	Paving Emission Reduction Credit
PERP	Portable Equipment Registration Program
PMF	positive matrix factorization
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
RACM	reasonably available control measures
RACT	reasonably available control technology
ROG	reactive organic gases
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SB	Senate Bill
SEP	Supplemental Environmental Project
SFTP	Secure File Transfer Protocol
SIP	State Implementation Plan
SMP	Smoke Management Program
SO_2	sulfur dioxide
SORE	small off-road engines
SPM	special purpose monitor
TAC	toxic air contaminant
TIGER	topologically integrated geographic encoding and referencing
Tpy	tons per year
$\mu g/m^3$	microgram per cubic meter
USEPA	United States Environmental Protection Agency
VEER	Vehicle Emissions on Each Road
VMT	vehicle miles travelled
VOC	volatile organic compound

1 Introduction and Background

1.1 Introduction

This Year 1 Community Emission Reduction Program Plan ("Emission Reduction Plan" or "Plan") presents objectives and methodologies for the Community Emission Reduction Program in the El Centro-Heber-Calexico Corridor in Imperial County, California ("Community"). This Plan was developed in response to the selection of this Community to implement an emissions reduction program under the California Air Resources Board (CARB) Community Air Protection Program (CAPP), a program established to help implement California Assembly Bill 617 (AB 617). This Plan specifically addresses the planning elements laid out in CARB's Community Air Protection Blueprint ("Blueprint"), a guidance document developed for the CAPP.[1] Each of the planning elements ultimately serve to address two main health-based objectives, which are:

- Maximizing progress on reducing exposure to toxic air contaminants that contribute to cumulative exposure burdens within selected communities; and
- Reducing exposure caused by localized particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$) sources to achieve healthful levels of $PM_{2.5}$ within the community.

This Plan demonstrates how the Community plans to reduce emissions at the local scale by identifying targets and implementing strategies to improve local air quality and ultimately satisfy these health-based objectives.

1.2 Background

1.2.1 Assembly Bill 617

On July 26, 2017, California Governor Jerry Brown signed into law AB 617, an act to amend and add sections regarding air pollution to California's Health and Safety Code. The bill directs CARB and local air districts throughout the state (including the Imperial County Air Pollution Control District [ICAPCD or "District"]) to enact measures to promote public health and welfare by reducing air pollution on a local scale, particularly in communities that are disproportionately burdened by air pollution. AB 617 was designed to accomplish this via the establishment of the CAPP, which puts the emphasis on community-focused actions that go beyond the regional and statewide air quality programs already in place.

[1] California Air Resources Board. 2018. *Community Air Protection Blueprint.* October. Available at: https://ww2.arb.ca.gov/sites/default/files/2018-10/final_community_air_protection_blueprint_october_2018.pdf. Accessed: August 2019.

AB 617 was designed to specifically improve air quality in communities with increased concentrations of criteria air pollutants[2] (CAPs) and toxic air contaminants[3] (TACs). These improvements are to be accomplished through community emissions reduction programs, community air monitoring, or both. Section 1.2.2 describes the process by which the first round of communities was selected, including the El Centro-Heber-Calexico Corridor in Imperial County.

1.2.2 Community Nomination Overview

As part of the CAPP, CARB's Governing Board selected California communities to participate by implementing a community air monitoring program, a community emissions reduction program, or both. AB 617 stipulated that the first round of communities was to be selected by October 1, 2018 and annually thereafter (i.e., beginning January 1, 2020). Each year, the selection process will involve three steps: Identification, Assessment, and Selection. During the Identification phase, CARB staff will update the running list of potential communities for participation in the CAPP. Input will be collected from air districts across the state and from the Office of Environmental Health Hazard Assessment (OEHHA), as well as internally from CARB's own experience and data resources. Community members will also be able to nominate their own or other communities for consideration. Once this broad list of potential communities has been updated, the next step is to assess the options.

In the Assessment phase, CARB staff will continue to consult with community stakeholders, OEHHA, and the air districts to determine which potential communities are experiencing disproportionate burdens due to cumulative air pollution exposure. The CAPP Blueprint details the factors that are to be evaluated during this phase, which may include concentrations of specific CAPs and TACs, quantified health risk estimates based on modeling, the proximity of sensitive populations to significant sources of air pollution, and socio-economic factors. Once the available and relevant data has been assessed, the final phase, Selection, is initiated.

1.2.3 Imperial County Community Nominations

In anticipation of the selection of communities to participate in the CAPP, both local air districts and citizens alike identified communities and submitted nominations to CARB. Ahead of the first selection due date of October 1, 2018, ICAPCD partnered with a local advocacy and environmental justice group known as Comite Civico del Valle, Inc. ("CCV") to author a report entitled *Imperial County AB 617 Community Nominations*,[4] with the purpose of informing CARB on which communities within Imperial County should be selected to participate in the first year of

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[2] Includes the six federally regulated air pollutants with National Ambient Air Quality Standards established by the USEPA as a requirement of the Clean Air Act. Additional information available at: https://www.epa.gov/criteria-air-pollutants. Accessed: August 2019.

[3] Defined by the California Health and Safety Code as air pollutants which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Additional information available at: https://oehha.ca.gov/air/toxic-air-contaminants. Accessed: August 2019.

[4] Available at: https://ww2.arb.ca.gov/resources/documents/imperial-county-ab617-community-nominations-submitted-partnership-comite-civico. Accessed: August 2019.

the CAPP. This report included relevant data regarding health, socioeconomics, and air quality monitoring for two cities (Calexico and El Centro) and one unincorporated community (Heber) within Imperial County. The geographic proximity of these three areas lent to their being grouped together as a single AB 617-nominated community known as the El Centro-Heber-Calexico Corridor ("Corridor"), which ICAPCD nominated as its first community for participation in the CAPP.

On September 27, 2018, the CARB Board made final its selections for the Year 1 communities to participate in the CAPP.[5] The El Centro-Heber-Calexico Corridor was chosen for both community air monitoring and a community emissions reduction program.

1.2.4 Community Steering Committee

A hallmark of the CAPP is community-driven action. AB 617 was designed to allow members from within the selected communities to take an active role in the development of their own air monitoring plans and emission reduction programs. Those who live and work in a selected community are both the most familiar with it and the most invested in promoting its environmental quality. Thus, AB 617 places an emphasis on community-driven action achieved under the oversight of groups known as community steering committees. These committees are to be comprised of primarily individuals who live and work within the communities they will represent. The CAPP Blueprint suggests that these committees include "participants from local community-based environmental justice organizations, schools, land use planning agencies, transportation agencies, local health departments (e.g., hospitals, clinics, physical rehabilitation centers, public health counseling services), academic researchers, and labor organizations, as appropriate."[6]

In late 2018, ICAPCD in conjunction with CCV assembled a steering committee for the El Centro-Heber-Calexico Corridor. Referred to as the AB 617 Community Steering Committee ("Steering Committee"), this group is intended to be involved with all aspects of the Community Emission Reduction Program and the community air monitoring program, including participant recruitment, identification of key objectives, monitoring site selection, emission reduction strategy selection, and evaluation and dissemination of results. The Steering Committee is also intended to maintain communication with other community members throughout the planning process to gather input from concerned citizens and facilitate ongoing discussion.

1.3 Objective

While the El Centro-Heber-Calexico Corridor was designated as a community to develop both a community air monitoring plan and a community emissions reduction program, this Plan serves to satisfy the requirements of only the latter. It was developed according to the guidelines laid out in the CAPP Blueprint. The goal in developing this Emission Reduction Plan is ultimately to

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[5] California Air Resources Board. 2018. *Resolution 18-37: Assembly Bill 617 Community Air Protection Program – Community Selection*. Available at: https://www.arb.ca.gov/board/res/2018/res18-37.pdf?_ga=2.16620022.1778124676.1548719155-1155382275.1462320702. Accessed August 2019.

[6] California Air Resources Board. 2018. *Community Air Protection Blueprint.* October. Available at: https://ww2.arb.ca.gov/sites/default/files/2018-10/final_community_air_protection_blueprint_october_2018.pdf. Accessed: August 2019.

develop local programs that go beyond existing efforts to reduce air pollution. This Plan was designed to be "action oriented", i.e., it includes direction for how the strategies should be implemented and how the emission reductions will be tracked and enforced. Ultimately, these strategies contribute to the overall objective of promoting public health and welfare in the Community through improvements in local air quality.

A key objective of AB 617 and the CAPP is to bring environmental justice into the scope of actions of disadvantaged communities. These chosen disadvantaged communities have been nominated and selected by CARB as areas where there will be benefits from monitoring and community emissions reductions strategies. The El Centro-Heber-Calexico Corridor is one of those designated communities. Following the principles of the CAPP, the following Plan aims to encompass the principles of environmental justice: to keep communities free of ecological destruction, engage in conversation of mutual respect with all peoples, and ensure the right to ethical and renewable use of land and resources.

1.3.1 Health-Based Air Quality Objectives

The overarching goal of community emissions reduction programs is to reduce CAP and TAC emissions in order to mitigate the impacts of exposure. While each of the communities selected to participate in the CAPP faces its own distinct air quality and health challenges, broad objectives provide a framework that emissions reduction programs can be developed around. Accordingly, the CAPP Blueprint specifies the following broad health-based air quality objectives which are mandatory to include in community emission reduction programs:

- Maximizing progress on reducing exposure to TACs that contribute to the cumulative exposure burden.
- Reducing exposure caused by local $PM_{2.5}$ sources to achieve healthful levels of $PM_{2.5}$ within the community.

Toxic air contaminants (TACs) include a long list of pollutants that contribute to the cumulative exposure burden in an area. Relatively common TACs include diesel particulate matter (emitted from diesel-fueled engines), hexavalent chromium, lead, benzene, and toluene. While many statewide programs in California have worked to reduce TAC emissions in recent decades, some communities are currently experiencing disproportionate exposures to them. Health risks associated with exposure to TACs may include acute and/or chronic illnesses, or increased cancer risks.

Communities in California also face air quality issues related to CAPs. Specifically, $PM_{2.5}$ and ozone (O_3) are of particular concern due to their elevated concentrations, which exceed federal standards in many California communities. However, the CAPP Blueprint only incudes a mandatory health-based air quality objective for addressing $PM_{2.5}$. Ozone is not addressed because of the nature of its formation. Ground-level O_3 in the atmosphere is formed over time by the reaction of precursor pollutants rather than being directly emitted by sources. The complex chemical reactions that form O_3 occur on a regional scale, widely dispersed from wherever the precursors were originally emitted. In contrast, particulate matter (and specifically $PM_{2.5}$) in the atmosphere is the result of both regional and localized emissions. Thus, targeted emissions

reductions on a local scale can reduce particulate exposure in overburdened areas in a way that reductions of O_3 precursor emissions cannot.

1.4 Document Organization

This Plan was developed and organized following the guidelines laid out in the CAPP Blueprint prepared by CARB. Specifically, each of the subsequent chapters in this Plan addresses one or more planning elements (summarized in Table 1.1 below).

Table 1.1. Community Emissions Reduction Program Planning Elements

Chapter	Title	Planning Elements Addressed
1	Introduction and Background	
2	Community Partnerships and Public Engagement	• Form Community Partnerships • Public Outreach
3	Understanding the Community	• Community Profile • Technical Foundation
4	Targets and Strategies	• Emission Reduction Targets • Proximity-based Goals • Emissions and Exposure Reduction Strategies • Implementation Schedule
5	Enforcement Plan	• Three-year Enforcement Review • Compliance Mechanisms
6	Metrics to Track Progress	• Required Metrics • Recommended Additional Metrics
7	California Environmental Quality Act	• California Environmental Quality Act
8	Conclusion and Checklist	

2 Community Partnerships and Public Engagement

2.1 Community Steering Committee

Community members are well suited for providing direct insight on the air quality issues in their community and their input is necessary to ensure effective community-focused strategies. As part of this planning element, a community steering committee must be formed to facilitate communication between community members and the air district, as well as to carry out emission reduction goals and objectives. Additionally, a steering committee is used to develop outreach opportunities to ensure that the community is able to participate in the decision-making process. The Steering Committee formed by the ICAPCD and CCV fulfills the requirements of this planning element.

2.1.1 Community Steering Committee Development Process

The purpose of the Steering Committee is to design goals and objectives, provide information to community members, and support local actions related to emission reductions. The Steering Committee for the El Centro-Heber-Calexico Corridor was convened by a collaborative effort between ICAPCD and CCV, following the selection of the Corridor as a CAPP Year 1 community. Since its formation, the Steering Committee has been involved with all aspects of both this Emission Reduction Plan and the Community Air Monitoring Plan. In the formation of this Plan, Steering Committee activities have included and will continue to include participant recruitment, identification of key objectives, development of strategies for the Emissions Reduction Plan, and evaluation and dissemination of results. Additionally, the Steering Committee was intended to serve as a communication channel with other Community members to gather input from concerned citizens and facilitate ongoing discussion.

On November 1, 2018, the ICAPCD hosted an informational meeting regarding the development of an AB 617 steering committee for the El Centro-Heber-Calexico Corridor. Open to the general public, the purpose of this meeting was to allow Community members to obtain information about the Community's upcoming air monitoring and emission reduction programs. Topics discussed at the meeting included the background of AB 617, the initial efforts of CCV and ICAPCD conducted to that point, plans for upcoming Community projects to be implemented as part of CAPP participation, and development of the Steering Committee.

At the November 1 meeting, emphasis was placed on getting the Steering Committee up and running, with the goal of holding its first meeting on November 14. ICAPCD staff explained that one of the initial objectives would be to develop bylaws for the group. Applications for the Steering Committee were distributed, and a due date was set for November 5. The application form posed specific questions to applicants designed to gauge their level of interest in participating in the Steering Committee, as well as what special knowledge or perspective they could contribute to the group towards ensuring that the larger community is being fairly represented and its wellbeing considered throughout the AB 617 process.

The District and CCV received a large volume of applications during the application period, which they reviewed together over the course of two meetings. The District Air Pollution Control Officer (APCO) and the CCV Executive Director, serving as co-chairpersons of the Steering Committee, then reviewed each application and worked with their respective staff to determine which

applicants were eligible and most aligned with the spirit and objectives of the CAPP Blueprint. Ultimately, the District APCO and CCV Executive Director came to a consensus on the final list of Steering Committee members. Table 2.1 displays the members who were chosen for the first AB 617 Steering Committee for the Community, the majority of which are residents of the El Centro-Heber-Calexico Corridor.

Table 2.1. AB 617 Community Steering Committee Members, 2018-2019

Representing	Members	Alternates
Co-Chair (ICAPCD)	Matt Dessert	Reyes Romero
Co-Chair (CCV)	Luis Olmedo	Christian Torres
Community Corridor	Mersedes Martinez	Rosa Guerrero
Community Corridor	Diahna Garcia-Ruiz	Bob Fischer
Community Corridor	Rene Felix	Tomas Oliva
Community Corridor	Mireya Diaz	Sandra Mendivil
Community Corridor	Kristian Salgado	Chris Gomez Wong
Community Corridor	Blake Plourd	Steven Snow
Community Corridor	Sergio Cabanas	Michael Moore
Community Corridor	Mark Baza	Virginia Mendoza
Community Corridor	Aide Fulton	Diego Gamboa
Community Corridor	Mary Salazar	Irene Garcia
Community Corridor	John Hernandez	Paul Monarrez
Community Corridor	Jose Celaya	VACANT
Community Corridor	VACANT	VACANT

As Table 2.1 displays, the Steering Committee consists of 15 members made up of two *ex-officio* co-chairs (representing ICAPCD and CCV) and 13 Community representatives. Some of these Community representatives are affiliated with various organizations around Heber, El Centro, and Calexico, including school districts, local government commissions, businesses, and non-profit organizations. They were selected to participate in the Steering Committee based on their potential to act as leaders and contribute technical expertise during planning. In the event that any Steering Committee members are unable to perform their duties, alternates were selected to step in.

2.1.2 Community Steering Committee Charter

In January 2019, staff from ICAPCD and CCV developed a draft AB 617 Steering Committee Charter ("draft Charter") for consideration by the Steering Committee. The draft Charter was

discussed and approved by the Steering Committee during the February 13th Steering Committee Meeting. The Charter was then submitted to the ICAPCD Governing Board, comprised of the Imperial County Board of Supervisors. Formally approved by the Board on March 19, 2019, the Charter establishes the authority and purpose of the Steering Committee along with its bylaws, and the intended structure and schedule for regular Steering Committee meetings.[7]

The Steering Committee is responsible for holding regular meetings to discuss topics related to the CAPP and provide recommendations for action to the ICAPCD Board. Topics of discussion can include approaches for community engagement and outreach, sources contributing to the Community's air quality challenges, strategies for developing and implementing the community air monitoring and emissions reduction programs, targets and goals, and metrics to track progress. The Charter specifies that these meetings be held at least once per month, unless there is a lack of agenda topics, in which case a vote may be held to cancel the following month's meeting. Special meetings may also be held as required. A summary of the Steering Committee meetings conducted to date is available in Appendix A. A copy of the Charter is presented as Appendix B.

2.2 Outreach Summary

As part of the commitment to community engagement and outreach, ICAPCD staff operates a website dedicated to AB 617 activity in Imperial County.[8] The site offers background information on AB 617 and has pages for information on the Steering Committee members, meetings and events (including notes and recordings from past meetings), contact information, and links to important resources such as the CARB home page and websites for local air monitoring networks. Additionally, both District and CCV staff have maintained that they will be available as resources to anyone with questions or just looking to gather more information about CAPP implementation in Imperial County. Information regarding the dedicated District contact person for this Plan is provided below.

Dedicated ICAPCD Contact Person

Belen Leon
Air Pollution Control District Project Manager
Phone: 442-265-1800
Email: belenleon@co.imperial.ca.us

The Steering Committee meetings are open to the public. They are advertised via email notifications, as well as flyers posted to the County's website. For those individuals who are unable to attend the meetings but would still like to view them in real time, the Committee began using Facebook to livestream the meetings in summer 2019. Future meetings will continue to be

[7] ICAPCD. 2019. AB 617 Community Steering Committee Charter. March 19. Available at: https://docs.wixstatic.com/ugd/99eb03_645f259f6bb44a4f81bedd12dfc98ce6.pdf. Accessed: August 2019.
[8] ICAPCD. AB 617 Imperial County: Calexico, Heber, El Centro Corridor. Available at: https://www.icab617community.org/. Accessed: August 2019.

livestreamed, as feasible. To enhance public understanding and participation, a professional interpretation service is available at each meeting to provide translation services. In addition, each meeting has a professional facilitator to encourage public and Steering Committee engagement, and to ensure that each agenda item is allocated sufficient time. At each meeting, a specific agenda item is included to allow for the public to issue comments. These comments are either addressed during the meeting or included as a discussion point for future meetings. For agenda items requiring more direct input from the Steering Committee or members of the public in attendance, electronic polling is utilized. Appendix C includes sign-in sheets, agendas, minutes, and invitation flyers for each Steering Committee Meeting. Presentation materials are available at the District's AB 617 website (www.icab617community.org/).

Community input received during the Steering Committee meetings has demonstrated the value of collaborating with members of the Community on both the Emissions Reduction Plan and the Community Air Monitoring Plan. Going forward, the Steering Committee will continue to engage with the public through monthly meetings. The flyer notification system has worked well in terms of spreading the word about meetings and promoting attendance, so it will continue to be utilized.

Finally, the ICAPCD has an established social media presence which they utilize to promote engagement by the Community in matters related to air quality and the AB 617 plans. The District operates a Facebook page[9] where regular posts are made to notify the public about important items such as high wind advisories, times when burning is and is not permitted, and daily air quality reports that provide summaries of ambient pollutant measurements recorded at regulatory monitoring stations around the County, as well as advertisements for upcoming Steering Committee meetings and photos and videos from past meetings. Similar posts are also made to the District's Instagram[10] and Twitter pages.[11]

[9] Available at: https://www.latest.facebook.com/Countyair/. Accessed: August 2019.
[10] Available at: https://www.instagram.com/county_air/. Accessed: August 2019.
[11] Available at: https://twitter.com/county_air. Accessed: August 2019.

3 Understanding the Community

3.1 Community Profile

Imperial County is located in a primarily desert region of southern California and shares an international border with Mexico. The Imperial Valley runs approximately north-to-south through the center of the County and extends into Mexico. The portion of the valley just north of the U.S.-Mexican border contains the El Centro-Heber-Calexico Corridor (see Figure 3.1). The population of Imperial County is approximately 170,000,[12] while the population in the Corridor is approximately 58% of that or 100,000. The principal industries in the County overall are farming and retail trade. The Community contains relatively few $PM_{2.5}$ stationary sources, but can experience significant emissions from vehicular traffic, particularly near Calexico and the international ports-of-entry into the United States. Other significant sources of direct $PM_{2.5}$ in the region are unpaved road dust, fugitive windblown dust, farming operations, and managed burning and disposal. The major air pollutant source types affecting the Community are presented in greater detail in Section 3.2.1.2 and Section 3.2.2.

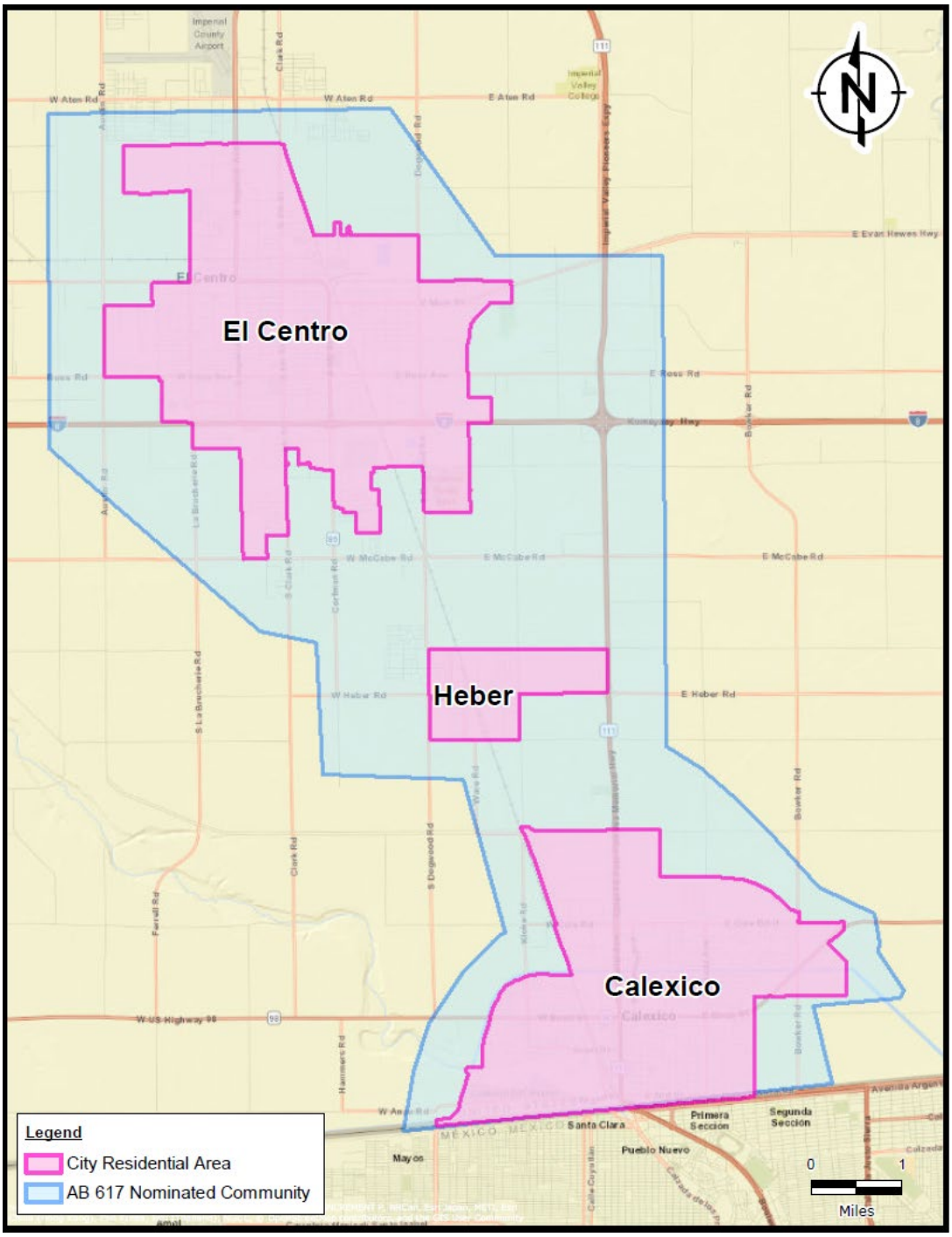
The local air quality is not only affected by the emissions in the area, but also by the degree to which these pollutants become dispersed in the atmosphere following emission or secondary formation (e.g., ozone, $PM_{2.5}$). One key factor affecting pollutant dispersion in the Imperial Valley is the degree of stability of the local atmosphere. Weather patterns and air currents dictate the degree of atmospheric stability in a region, which regulates the amount of air exchange or "mixing" that can occur in the air basin. Factors like restricted mixing and low wind speeds are associated with higher atmospheric stability. At times, Imperial County can experience a phenomenon known as a "subsidence inversion" which greatly restricts the vertical mixing of air. This leads to highly stable atmospheric conditions which can cause the stagnation of airflow and buildup of pollutants for days at a time, contributing to exceedances of air quality standards.

The Community exists in an area that is designated as nonattainment of the National Ambient Air Quality Standards (NAAQS) for 8-hour O_3, 24-hour particulate matter less than 10 microns in aerodynamic diameter (PM_{10}), and 24-hour and annual $PM_{2.5}$. The NAAQS are standards established by the United States Environmental Protection Agency (USEPA) to be protective of human health and welfare. Areas designated as nonattainment are required to develop State Implementation Plans (SIPs) to address the underlying air quality issues and advance air quality improvement measures to achieve the NAAQS. As such, the ICAPCD has developed updated SIPs for PM_{10},[13] $PM_{2.5}$,[14] and O_3[15] within the past several years. One significant conclusion from the 2018 PM_{10} SIP is that the nonattainment area is actually in attainment of (and maintaining)

[12] OEHHA. 2018. CalEnviroScreen 3.0. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30. Accessed: August 2019.
[13] ICAPCD. 2018. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/sip.pdf. Accessed: August 2019.
[14] ICAPCD. 2018. Imperial County 2018 Annual Particulate Matter Less Than 2.5 Microns in Diameter State Implementation Plan. Available at: https://www.co.imperial.ca.us/AirPollution/otherpdfs/2018-IC-PM25SIP.pdf. Accessed: August 2019.
[15] ICAPCD. 2017. Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/2017O3sip_final.pdf. Accessed: August 2019.

the NAAQS with the allowance of the Exceptional Event designation for high wind events. Essentially, a large portion of PM_{10} emissions in Imperial County are contributed by windblown dust during meteorological events in which greater-than-average wind speeds stir up large amounts of dust from open areas and the surrounding desert. In a similar vein, the 2018 $PM_{2.5}$ SIP and 2017 O_3 SIP each describe technical analyses conducted to support that their respective implementation plans would be adequate to attain and maintain the NAAQS "but for" the transport of emissions originating in Mexico and thus outside the jurisdiction of the District, CARB, and the USEPA. While beneficial, these plans are designed to address air quality issues at the regional level for Imperial County. In contrast, this Plan, prepared in accordance with AB 617, expands upon previous efforts in the SIPs to specifically focus on the El Centro-Heber-Calexico Corridor. A selection of air quality findings pertaining to the Community from the most recent Imperial County SIPs is provided in Section 3.2.1.1.

Figure 3.1. El Centro-Heber-Calexico Corridor



Aside from understanding the direct air quality burden, it is also essential to review the socioeconomic issues facing the Community to inform development of the Plan. Individuals with health ailments and lower socioeconomic status are more vulnerable to health impacts resulting from air pollution. To assess the impacts of environmental and socioeconomic factors on each

census tract in the State of California, OEHHA and the California Environmental Protection Agency (CalEPA) developed a mapping tool called CalEnviroScreen, Version 3.0 (CES3). In CES3, census tracts are ranked statewide and assigned a percentile for various indicators. A high indicator percentile indicates a worse exposure or burden. The CES3 score is then calculated as the population burden (average of exposure and environmental effect percentiles[16]) multiplied by the population characteristics (average of sensitive population and socioeconomic factor percentiles). Table 3.1 summarizes the range and average percentiles for sensitive populations and socioeconomic indicators for census tracts within the El Centro-Heber-Calexico Corridor. As shown in Table 3.1, the average percentile in the Corridor for all listed indicators is above 70, with the exception of low birth-weight infants and housing burdened low-income household. For all but one census tract, the high end of the indicator range is in the 90th percentile.

Table 3.1. CES3 Percentiles for Census Tracts within the El Centro-Heber-Calexico Corridor

Indicator		Indicator Percentile	
		Range	Average
Population Characteristics: Sensitive Populations	Asthma	57.6 - 95.2	79.1
	Cardiovascular disease	63.6 - 96.4	90.7
	Low birth-weight infants	11.3 - 85.7	45.4
Population Characteristics: Socioeconomic Factors	Poverty	17.9 - 99.1	72.5
	Unemployment	38.5 - 99.9	82.1
	Educational attainment	42.6 - 96.5	78.0
	Linguistic isolation	28.6 - 99.7	81.7
	Housing burdened low-income household	0.4 - 92.0	49.2

Notes:

[a] Indicator percentiles obtained from CalEnviroScreen 3.0 for census tracts 6025011100, 6025011201, 6025011202, 6025011300, 6025011400, 6025011500, 6025011600, 6025011700, 6025011801, 6025011802, 6025011803, 6025011900, 6025012001, 6025012002, 6025012100, and 6025012200. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30. Accessed: February 2019.

Additional potential areas of concern related to exposures and environmental effects from pollution include impaired water bodies and exposure to toxic components of pesticides. These and other air pollution burdens are explored further in Section 3.2.1.1.

[16] Environmental effects component is weighted one-half when combined with the exposures component.

3.2 Technical Foundation

A strong technical foundation is necessary to understand the sources of air pollution impacting a community and to provide a means of measuring emission reductions. The technical foundation serves to accomplish the following related to an emission reduction program:

- Establish a baseline understanding of the air pollution challenges in the community;
- Identify the key air pollutants and sources for programmatic focus;
- Support the development of targets and strategies; and
- Provide a mechanism to track progress.

These elements of the Plan's technical foundation are explored in the sections that follow.

3.2.1 Existing Cumulative Air Quality Exposure Burden

3.2.1.1 Evaluation of Existing Data

Cumulative air quality exposure burden accounts for exposure to air pollution in combination with the vulnerability of the population. The cumulative air quality exposure burden is evaluated through a set of factors relating to air pollution and socioeconomic status, including:[17]

- Concentrations of pollutants from measurements, air quality modeling, or other air pollution quantifier;
- Density of pollution sources and magnitude of emissions within the community;
- Cancer risk estimates within the community;
- Sensitive populations located in close proximity to emission sources;
- Public health data that are representative of the incidence or worsening of disease related to air quality; and
- Socioeconomic factors.

As discussed in Section 3.1, certain areas of the Corridor rank as high as the 99th percentile for socioeconomic factors within the State of California. This section evaluates the existing data from air quality monitors and CES3 indicators for air pollution.

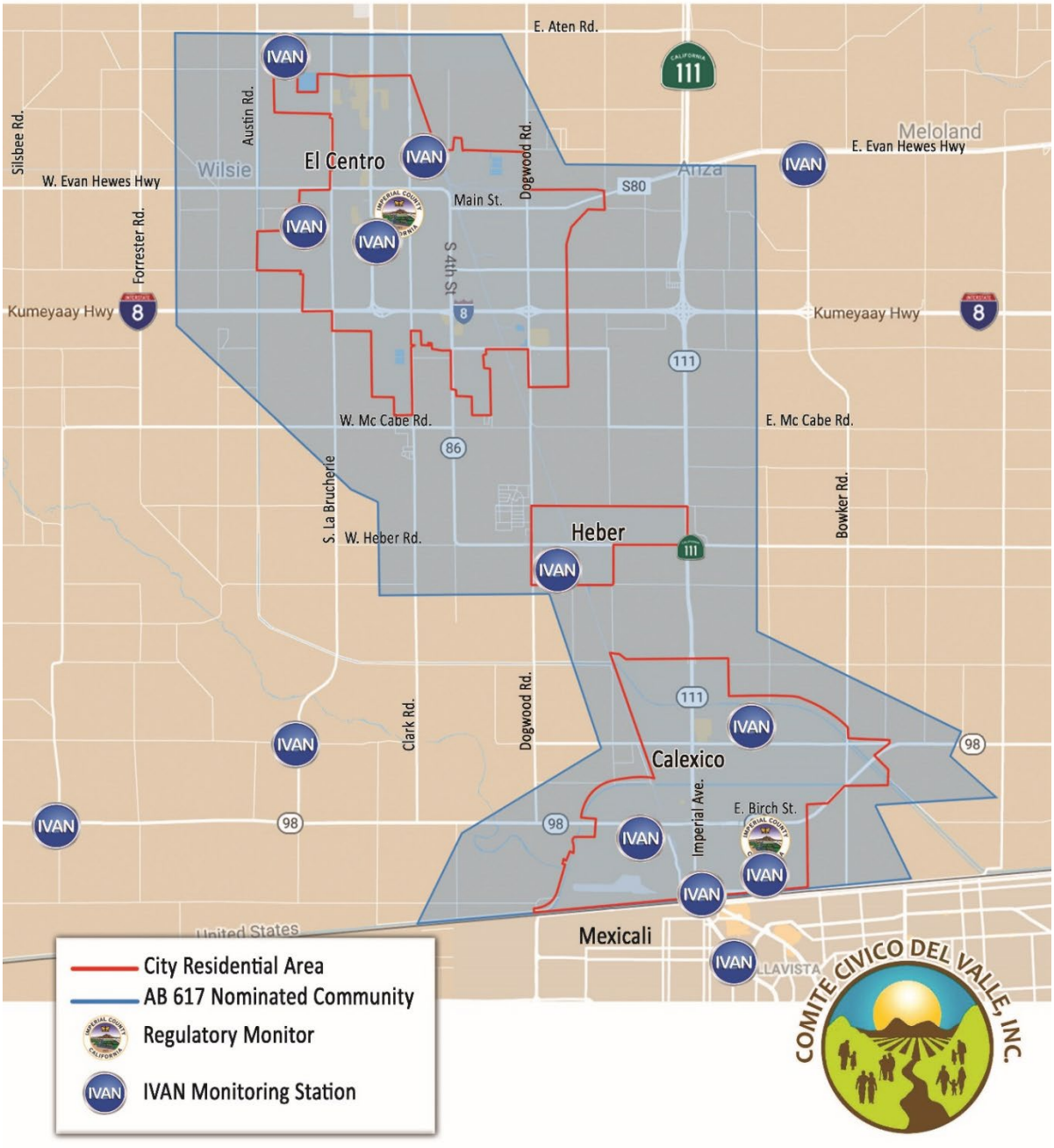
Air Quality Monitoring Data

Within the El Centro-Heber-Calexico Corridor footprint, there are two regulatory monitors and nine community monitors. The community monitors are a part of CCV's Identifying Violations Affecting

[17] CARB. 2019. High Cumulative Exposure Burden. Available at: https://ww2.arb.ca.gov/capp-resource-center/community-assessment/high-cumulative-exposure-burden. Accessed: August 2019.

Neighborhoods (IVAN) network. The locations of all eleven monitors, plus three additional community monitors located adjacent to the Corridor, are presented in Figure 3.2.

Figure 3.2. Locations of Air Quality Monitors in the El Centro-Heber-Calexico Corridor



Regulatory Monitoring

Existing regulatory monitors within the Corridor include the El Centro monitoring station and the Calexico-Ethel monitoring station. The El Centro monitoring station was installed in 1986 and is maintained by ICAPCD. It is located at 150 9th Street in El Centro. The monitoring station is classified as urban and is surrounded by government and commercial buildings, with large agricultural areas to the east and west of the El Centro city boundaries. The El Centro monitoring station records measurements for O_3, carbon monoxide (CO), nitrogen dioxide (NO_2), $PM_{2.5}$, and PM_{10}.

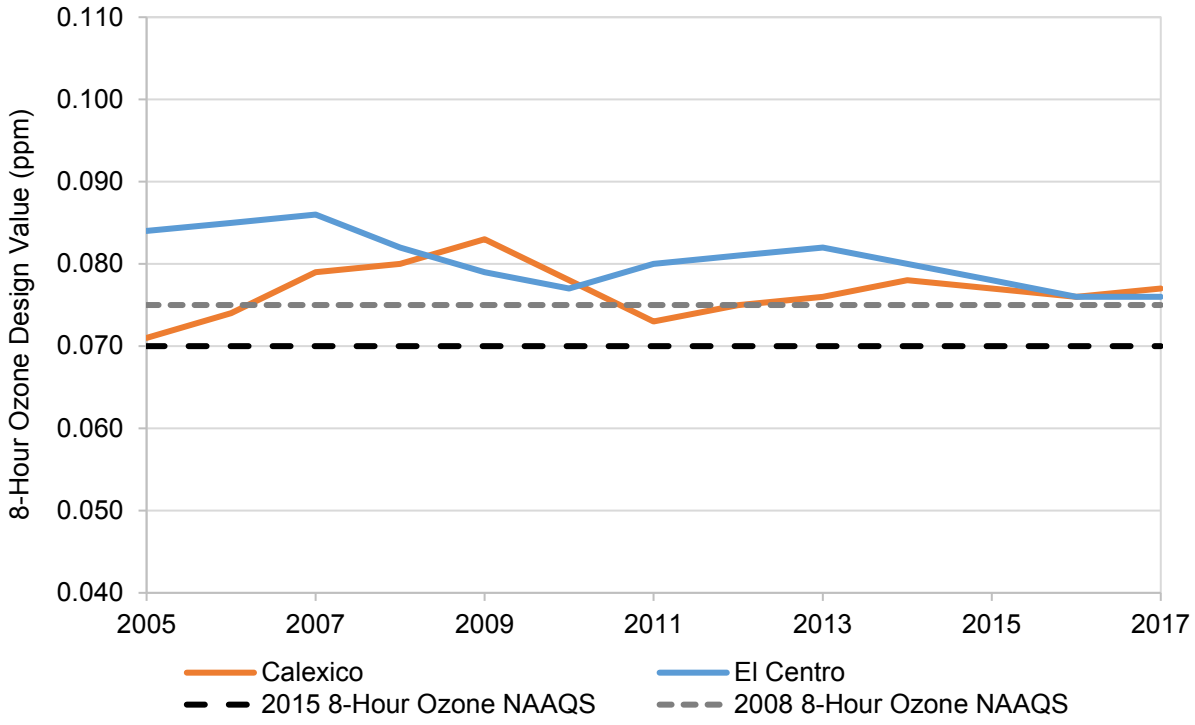
The Calexico-Ethel monitoring station was installed in 1994 and is operated and maintained by CARB. It is located at 1029 Belcher Street in Calexico. This monitoring station is surrounded by a suburban neighborhood and is approximately 0.75 miles north of the United Sates-Mexico border. The Calexico-Ethel station monitors O_3, CO, NO_2, sulfur dioxide (SO_2), $PM_{2.5}$, PM_{10}, lead (Pb), and toxics.

Data from the El Centro and Calexico-Ethel monitors are validated and used to determine the federal attainment status for Imperial County.[18] Both monitoring stations feature meteorological sensors that measure temperature, humidity, wind direction, and wind speed. Since these monitors are used for regulatory purposes, final data are not immediately available; however, preliminary O_3, $PM_{2.5}$, and PM_{10} data are made available to the public through www.imperialvalleyair.org. Additionally, some pollutants are only monitored once every three days or once every six days.

Monitoring data for O_3, PM_{10}, and $PM_{2.5}$ are shown in Figures 3.3 through 3.9 and provide a snapshot of recent air quality conditions in El Centro and Calexico.

[18] There are three additional regulatory monitoring stations in Imperial County which are located outside of the Corridor. These include the Brawley monitoring station, the Niland monitoring station, and the Westmorland monitoring station.

Figure 3.3. Comparison of 8-hour Ozone Design Values at the Calexico and El Centro Monitoring Stations to the NAAQS



Monitoring data for O_3 at the Calexico and El Centro monitoring stations[19] indicate that levels there have remained relatively constant since 2005, with no significant trend upwards or downwards. Furthermore, the 2017 Ozone SIP for Imperial County[20] demonstrated how international transport of emissions from Mexico of O_3 precursor pollutants contributes to ambient O_3 levels in Imperial County. This effect is especially pronounced at the regulatory monitors closest to the U.S.-Mexico border (i.e., El Centro and Calexico), and contributes to O_3 measurements exceeding the NAAQS.

[19] The design value for the 8-hour Ozone NAAQS is computed as the annual fourth-highest daily maximum 8-hour concentration measured at the monitor, averaged over 3 years.

[20] ICAPCD. 2017. Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/2017O3sip_final.pdf. Accessed: August 2019.

Figure 3.4. Comparison of Annual $PM_{2.5}$ Design Values at the Calexico and El Centro Monitoring Stations to the NAAQS

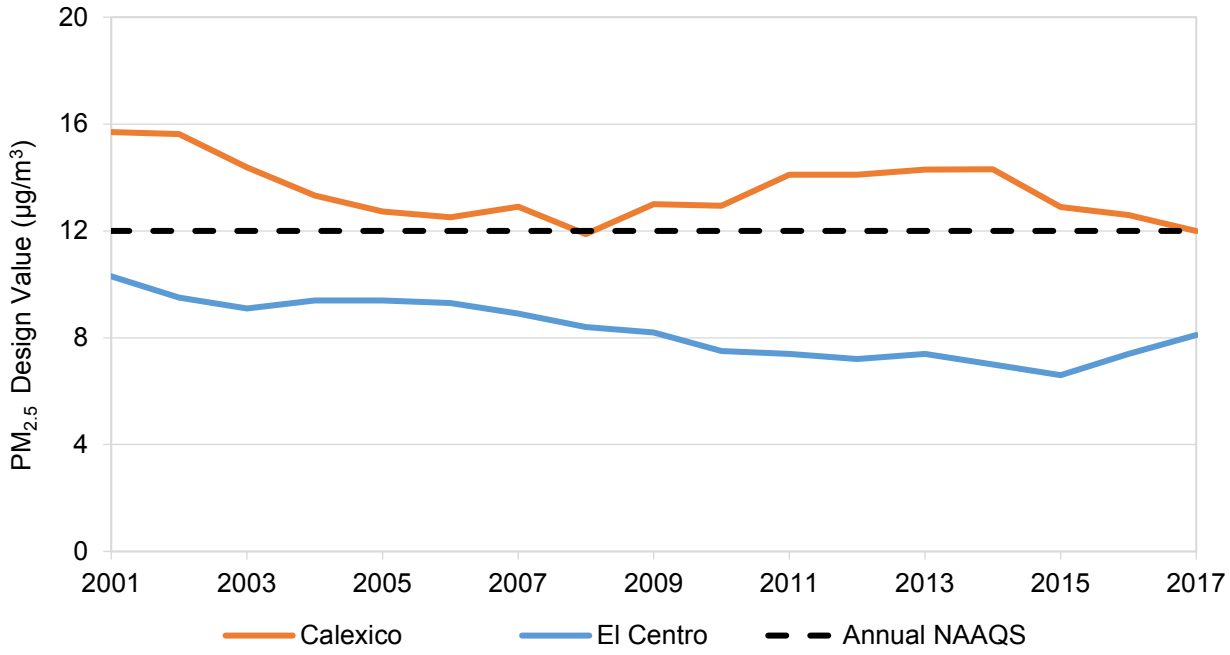


Figure 3.4 displays data for $PM_{2.5}$ at the Calexico and El Centro monitoring stations and indicates that levels have exhibited a slight downward trend since 2001 at both stations. However, the $PM_{2.5}$ design values (i.e., the annual mean values averaged over three years) for 2017 are very close to those for 2008 at both stations, with slight variation in the intermittent decade. For the monitoring station with higher ambient $PM_{2.5}$ concentrations (Calexico), it is important to note the decrease in recent years. In 2014, the annual average concentration at the Calexico monitor was 13.8 µg/m^3. By 2016, the annual average concentration at Calexico had decreased 10 percent to 12.5 µg/m^3. Additionally, although El Centro's annual average concentration did increase in between 2015 and 2017 from 6.6 µg/m^3 to 8.1 µg/m^3, respectively, it was still under the NAAQS.[21] $PM_{2.5}$ emissions at Calexico are impacted by the transport of pollution over the border from Mexicali. Emission sources that contribute to the $PM_{2.5}$ concentrations at Calexico include traffic emissions within the Calexico/Mexicali border area, electrical generation, other industrial sources, unpaved roads, and cultural practices such as bonfires and fireworks. Elevated $PM_{2.5}$ concentrations in this region occur most frequently during the winter months when winds are stagnant.[22]

[21] The design value for the annual $PM_{2.5}$ NAAQS is computed as the annual mean of $PM_{2.5}$ concentrations measured at the monitor, averaged over 3 years. The 2015 design value shown in the plot is 12.9 µg/m^3 and does not include data from the Special Purpose Monitor (SPM) that was included in 2015 at Calexico. USEPA's Air Quality System (AQS) includes data from the SPM in quarters 1 and 4 of 2015, which results in a design value of 13.1 µg/m^3.

[22] ICAPCD. 2018. Imperial County 2018 Annual Particulate Matter Less Than 2.5 Microns in Diameter State Implementation Plan. Available at: https://www.co.imperial.ca.us/AirPollution/otherpdfs/2018-IC-PM25SIP.pdf. Accessed: August 2019.

Figure 3.5. Comparison of 24-hour PM_{10} Concentration Measurements at the Calexico Monitoring Station to the NAAQS

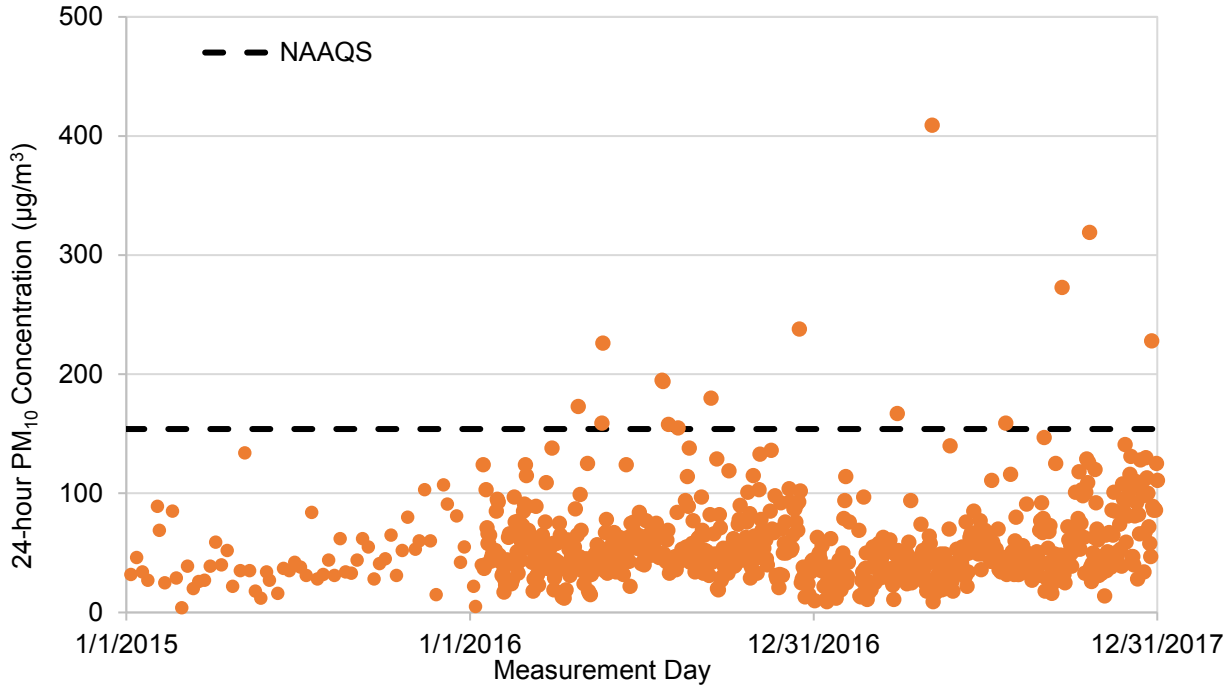
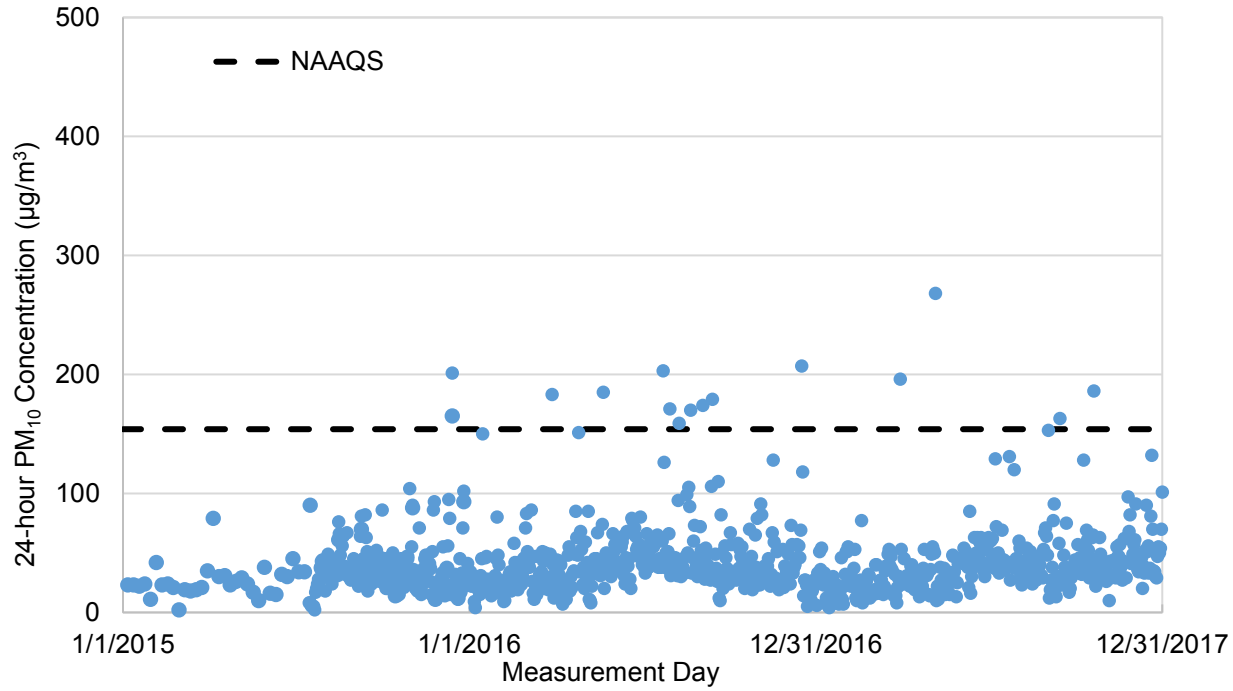


Figure 3.6. Comparison of 24-hour PM_{10} Concentration Measurements at the El Centro Monitoring Station to the NAAQS



Figures 3.5 and 3.6 present PM_{10} monitoring data collected at the Calexico and El Centro monitoring stations, respectively. Because the NAAQS for PM_{10} is evaluated based on daily 24-hour time-averaged measurements,[23] the plots display data points for each 24-hour measurement collected at the sites from 2015 to 2017. The data shows that on most days, PM_{10} levels are well below the 150 µg/m^3 standard. However, the NAAQS is still exceeded somewhat regularly. As discussed in the 2018 PM_{10} Plan for Imperial County, these exceedances are attributed to occurrences of high wind activity during exceptional events.[24]

Community Monitoring

The IVAN network is a collection of 40 air quality sensors located throughout the Imperial Valley, nine of which are located within the El Centro-Heber-Calexico Corridor, plus an additional three which are located adjacent to the Corridor.[25] The network was developed and is managed by CCV, the California Environmental Health Tracking Program, and the University of Washington School of Public Health. The sensors began collecting data in September 2016 and currently monitor for particulate matter. The collected data is reported in real time to a website that can be viewed by community members directly. The data is also used to calculate community air quality levels (CALs), which describe current air quality and provide health recommendations to the community. Currently, the data from the IVAN network cannot be used to determine attainment status or other air quality requirements.

Air Pollution Burden

Air pollution burden can be used to evaluate the relative impact of pollution sources and emission levels within a community, which is one of the metrics for evaluating cumulative exposure burden. CES3 evaluates seven pollution burden exposure indicators and five pollution burden environmental effects indicators. Air quality-related CES3 indicators that are relevant to the Corridor include O_3, $PM_{2.5}$, diesel particulate matter (DPM), pesticide use, and toxic releases from facilities. The O_3 and $PM_{2.5}$ indicators are based on existing data from the CARB air monitoring network. The DPM indicator is based on modeled mobile source emissions data from CARB and the San Diego Association of Governments. The pesticide use and toxic release indicators are based on values reported by industrial and agricultural facilities.[26] Together, these indicators provide useful information on the existing air quality cumulative exposure burden in a given area.

Figure 3.7 presents the burden percentile for each of the air quality-related indicators, as well as the average of these indicators (i.e., “pollution burden”) as compared to the State of California. As seen in this figure, the average pollution burden is highest near Calexico. Exceptions to this

[23] The 24-hour PM_{10} NAAQS is 150 µg/m^3, which is not to be exceeded more than once per year on average over three years. Measurements for this metric are customarily rounded to the nearest 10 µg/m^3. Hence, the NAAQS in Figures 3.5 and 3.6 is shown at 154 µg/m^3 as any measurement below this value rounds down to 150 and thus would not exceed the standard.

[24] ICAPCD. 2018. Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less Than 10 Microns in Diameter. Available at: https://www.arb.ca.gov/planning/sip/planarea/imperial/sip.pdf. Accessed: August 2019.

[25] Additional information on the IVAN network can be found at: https://ivanonline.org/. Accessed: August 2019.

[26] OEHHA. 2018. CalEnviroScreen 3.0. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30. Accessed: August 2019.

are pesticide use, which is highest in the agricultural areas of Imperial County. Toxic release burden is below the 50th percentile for all census tracts in Imperial County.

Figure 3.8 presents the burden percentiles as compared to only census tracts in Imperial County. This figure shows a similar trend to the statewide percentiles, indicating that most of the pollution burden in the County is concentrated close to the US-Mexico border. A few indicators that demonstrate elevated burden away from the border include DPM within the city of El Centro and pesticide use in the agricultural areas. In addition, the O_3 burden is above the 90th percentile in El Centro and Heber and lower in surrounding areas. However, O_3 is created through secondary formation from NO_X and VOC and can show up in areas that are not necessarily in the location of the source. Therefore, O_3 emissions could be influenced by sources south of the US-Mexico border.

Figure 3.7. CES3 Statewide Burden Percentiles for Air Quality-Related Indicators

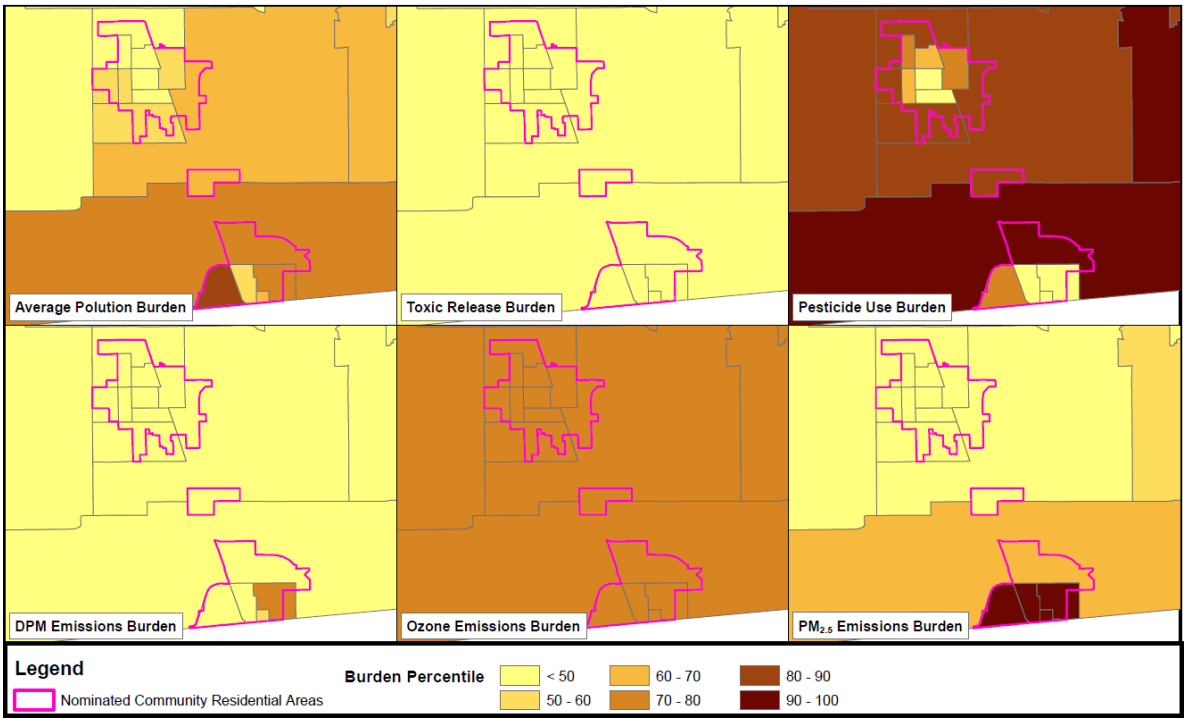


Figure 3.8. CES3 Countywide Burden Percentiles for Air Quality-Related Indicators

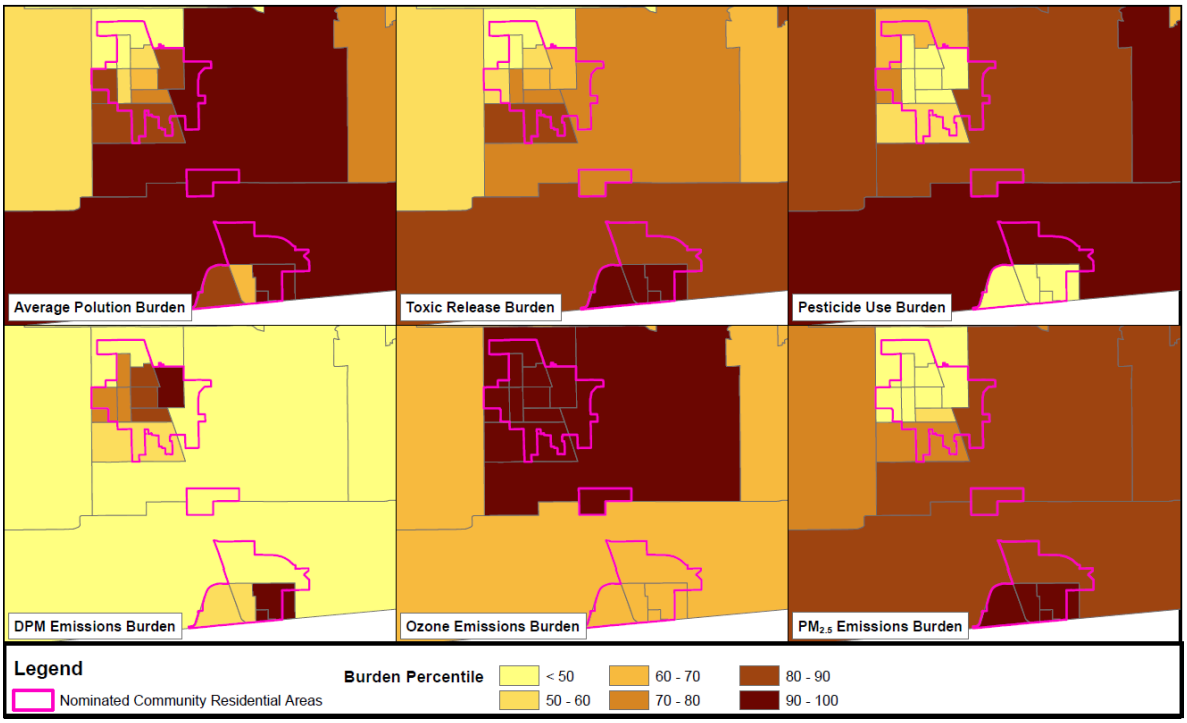


Table 3.2 summarizes the range and average indicator percentile for census tracts within the El Centro-Heber-Calexico Corridor. As shown in Table 3.2, the high end of the indicator range is greater than the 75th percentile for all indicators except for drinking water and toxic releases from facilities.

Table 3.2. CES3 Statewide Burden Percentiles for Census Tracts within the El Centro-Heber-Calexico Corridor

Indicator		Indicator Percentile	
		Range	Average
Pollution Burden: Exposures	Ozone	73.9 - 77.9	76.4
	$PM_{2.5}$	17.8 - 94.7	43.5
	DPM	6.4 - 78.0	29.2
	Pesticide use	61.2 - 90.3	79.3
	Traffic	16.2 - 92.6	43.6
	Drinking water	25.6 - 48.0	31.6
	Toxic releases from facilities	13.0 - 49.4	37.3
Pollution Burden: Environmental Effects	Solid waste sites and facilities	10.1 - 98.7	62.8

	Cleanup sites	2.0 - 90.5	34.6
	Groundwater threats	8.9 - 92.8	47.0
	Impaired water bodies	71.6 - 99.4	83.7
	Hazardous waste generators and facilities	43.1 - 94.9	72.7

Notes:

[a] Indicator percentiles obtained from CalEnviroScreen 3.0 for census tracts 6025011100, 6025011201, 6025011202, 6025011300, 6025011400, 6025011500, 6025011600, 6025011700, 6025011801, 6025011802, 6025011803, 6025011900, 6025012001, 6025012002, 6025012100, and 6025012200. Available at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30. Accessed: May 2019.

3.2.1.2 Key Air Pollutants and Associated Sources

The economy in Imperial County is predominantly tied to agriculture. Agricultural operations can result in emissions from land management activities (e.g., tilling, burning), concentrated animal feeding operations (CAFOs), off-road equipment (e.g., tractors and pumps), on-road vehicles, and unpaved roads. In addition to the agricultural economy, Imperial County also has industrial energy sources and a significant amount of off-highway vehicle (OHV) activity in the outlying desert/open areas. Due to its proximity to the international border, there is also a large amount of emissions associated with vehicles idling at and traveling through the international ports-of-entry.

In addition to anthropogenic (i.e., “human caused”) activities, the area is also susceptible to high wind events, which can lead to elevated concentrations of particulate matter. Table 3.3 below summarizes the types of air pollutants generally associated with the sources discussed. A more thorough discussion of the emissions within the Corridor specifically in the context of an emission inventory is provided in Section 3.2.2.

Table 3.3. Examples of Key Emission Sources in Imperial County and Associated Pollutants

Emissions Source	Associated Pollutants
Agricultural Activities (tilling)	PM_{10}, $PM_{2.5}$
Agricultural Activities (burning)	$PM_{2.5}$
Concentrated Animal Feeding Operations	PM_{10}, $PM_{2.5}$, methane (CH_4), ammonia (NH_3)
Off-Road Equipment	Combustion By-products[a]
On-Road Vehicles	Combustion By-products[a]
Unpaved Roads	PM_{10}, $PM_{2.5}$
Industrial Energy Production	Combustion By-products[a]
Off-Highway Vehicles / Open Areas	PM_{10}, $PM_{2.5}$
Regional Wind Events	PM_{10}, $PM_{2.5}$

Notes:

[a] Combustion by-products will vary by fuel type but will generally include carbon dioxide, carbon monoxide, sulfur dioxide, nitrogen oxides, particulate matter, and toxics.

3.2.2 Community-Level Emissions Inventory

A community-level emissions inventory is essential to understanding existing emissions levels in the Corridor and tracking emissions reductions in the future. In addition, an emissions inventory can help determine which sources contribute the most to emissions and the exposure burden in the Community. The community-level emissions inventory for the Corridor was developed by CARB using best available data. The inventory includes estimates of air pollutant emissions from stationary, area-wide, on-road mobile, and off-road mobile sources. The base year for the inventory is 2017. Emission projections were made for 2024 and 2029. The methodology used to develop the base year and forecasted inventories is described in the following sections.

3.2.2.1 Stationary Sources

The stationary source emissions inventory category consists of three subcategories: stationary point sources, stationary aggregate sources, and stationary aggregate point sources. Stationary point sources include facilities that require a permit under ICAPCD regulations. All facility permits are required to include a source description, list of pollutants of concern, and provide emission factors used to evaluate facility emissions. Permitted facilities are also required to submit annual reports to ICAPCD that provide activity data for that year. This community-level emissions inventory uses the reported emission factors from the facility permits and activity data from the 2017 annual emissions reports to quantify CAP and TAC emissions. If emission factors were not available, USEPA AP-42 emission factors were used. Examples of stationary point sources featured in this analysis include: fuel combustion (electric utilities and combustion for industrial and commercial facilities), waste disposal (compost operations and incinerators), industrial processes (concrete, milling, and sandblasting facilities), and petroleum marketing.

When possible, area-wide sources were moved to stationary aggregate point sources using spatial surrogates that had been developed for prior SIP modeling. CARB worked with ICAPCD to quantify emissions using 2017 activity data. Emissions were then allocated based on the locations of activity data, as available. If activity data was not available, emissions for those stationary sources remained as stationary aggregate sources and were distributed evenly using spatial surrogates. Examples of stationary aggregate sources featured in this analysis include: cleaning and surface coatings (autobody shops, dry cleaners, industrial locations, metal parts coating operations, wood furniture coating operations, and other coating operations), fuel combustion (industrial locations), solvent evaporation (hospitals, restaurants, and autobody shops), petroleum marketing (gas stations), waste disposal (publicly owned treatment works), and miscellaneous processes (char broiling).

The stationary source CAP emissions were projected to 2024 and 2029 using the 2016 SIP statewide forecast (California Emissions Projection Analysis Model [CEPAM] version 1.05), with the following exceptions:

- **Updated control profiles:** CARB made an effort to incorporate control profiles for District rules that have been adopted since CEPAM version 1.05 was originally developed.
- **Point source 'no growth' assumption:** CARB's SIP growth profiles largely reflect average industry-wide changes in activity. To reflect the inherent uncertainty in forecasting individual facilities that fall with a small community boundary, CARB defaulted to a 'no growth' assumption for stationary point sources. Emission control factors were still applied to these sources.
- **Point source 'second look' analysis:** To mitigate the uncertainty related to point source community forecasting, CARB conducted supplemental research on the top emitting point source facilities. The facilities that CARB reviewed collectively account for over 90% of all criteria point source emissions within the Community boundary.

The stationary source TAC emissions forecast was developed by applying speciation profiles to TOG and PM emissions from the forecasted stationary source CAP inventories.

A summary of stationary source base year CAP emissions by source category is shown in Table 3.4 and base year toxicity-weighted TAC emissions for all stationary sources are shown in Table 3.5. Forecasted CAP and TAC emissions for 2024 and 2029 are shown in Appendix D. Locations of stationary point sources, stationary aggregate sources, and stationary aggregate point sources are shown in Figure 3.9.[27]

Table 3.4. Base Year (2017) Community-Level Emissions Inventory – Stationary Source Criteria Air Pollutants

	NO_X	TOG	ROG	SO_X	PM_{10}	$PM_{2.5}$	DPM
STATIONARY SOURCES TOTAL[1]	**189.76**	**915.95**	**255.39**	**8.10**	**119.11**	**48.99**	**0.14**
FUEL COMBUSTION	**162.31**	**29.68**	**4.93**	**3.11**	**16.50**	**16.47**	**0.14**
ELECTRIC UTILITIES	*82.55*	*25.45*	*3.04*	*1.57*	*14.45*	*14.42*	*0.00*
MANUFACTURING AND INDUSTRIAL	*79.62*	*3.72*	*1.81*	*1.54*	*2.01*	*2.00*	*0.14*
SERVICE AND COMMERCIAL	*0.14*	*0.47*	*0.04*	*0.01*	*0.04*	*0.04*	*0.00*
PETROLEUM REFINING (COMBUSTION)	*0.00*	*0.05*	*0.04*	*0.00*	*0.00*	*0.00*	*0.00*
WASTE DISPOSAL	**23.66**	**1.18**	**0.26**	**4.97**	**2.24**	**2.23**	**0.00**
INCINERATORS	*23.66*	*1.09*	*0.18*	*4.97*	*2.19*	*2.19*	*0.00*
SEWAGE TREATMENT	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*
OTHER (WASTE DISPOSAL)	*0.00*	*0.09*	*0.08*	*0.00*	*0.05*	*0.05*	*0.00*
INDUSTRIAL PROCESSES	**3.74**	**2.96**	**2.35**	**0.02**	**17.40**	**1.34**	**0.00**
MINERAL PROCESSES	*3.09*	*1.02*	*1.00*	*0.02*	*4.01*	*0.81*	*0.00*
FOOD AND AGRICULTURE	*0.66*	*1.94*	*1.36*	*0.00*	*13.39*	*0.53*	*0.00*
PETROLEUM PRODUCTION AND MARKETING	**0.04**	**74.31**	**74.31**	**0.00**	**0.00**	**0.00**	**0.00**

[27] Two stationary source facilities located outside of the Community boundary, SFPP, L.P. and Pyramid Construction and Aggregates, Inc., were included in the stationary source emission inventory due to Community concern.

Table 3.4. Base Year (2017) Community-Level Emissions Inventory – Stationary Source Criteria Air Pollutants

	NO_X	TOG	ROG	SO_X	PM_{10}	$PM_{2.5}$	DPM
PETROLEUM MARKETING	*0.04*	*74.31*	*74.31*	*0.00*	*0.00*	*0.00*	*0.00*
SOLVENT EVAPORATION	**0.00**	**23.39**	**18.01**	**0.00**	**0.00**	**0.00**	**0.00**
CONSUMER PRODUCTS	*0.00*	*23.39*	*18.01*	*0.00*	*0.00*	*0.00*	*0.00*
CLEANING AND SURFACE COATINGS	**0.00**	**109.23**	**98.71**	**0.00**	**0.00**	**0.00**	**0.00**
LAUNDERING	*0.00*	*4.31*	*4.31*	*0.00*	*0.00*	*0.00*	*0.00*
DEGREASING	*0.00*	*61.81*	*53.80*	*0.00*	*0.00*	*0.00*	*0.00*
ADHESIVES AND SEALANTS	*0.00*	*17.39*	*15.50*	*0.00*	*0.00*	*0.00*	*0.00*
COATINGS AND RELATED PROCESS SOLVENTS	*0.00*	*25.71*	*25.11*	*0.00*	*0.00*	*0.00*	*0.00*
MISCELLANEOUS PROCESSES	**0.00**	**675.21**	**56.82**	**0.00**	**82.97**	**28.95**	**0.00**
FARMING OPERATIONS	*0.00*	*664.84*	*53.19*	*0.00*	*60.98*	*6.96*	*0.00*
COOKING	*0.00*	*10.37*	*3.63*	*0.00*	*21.99*	*21.99*	*0.00*

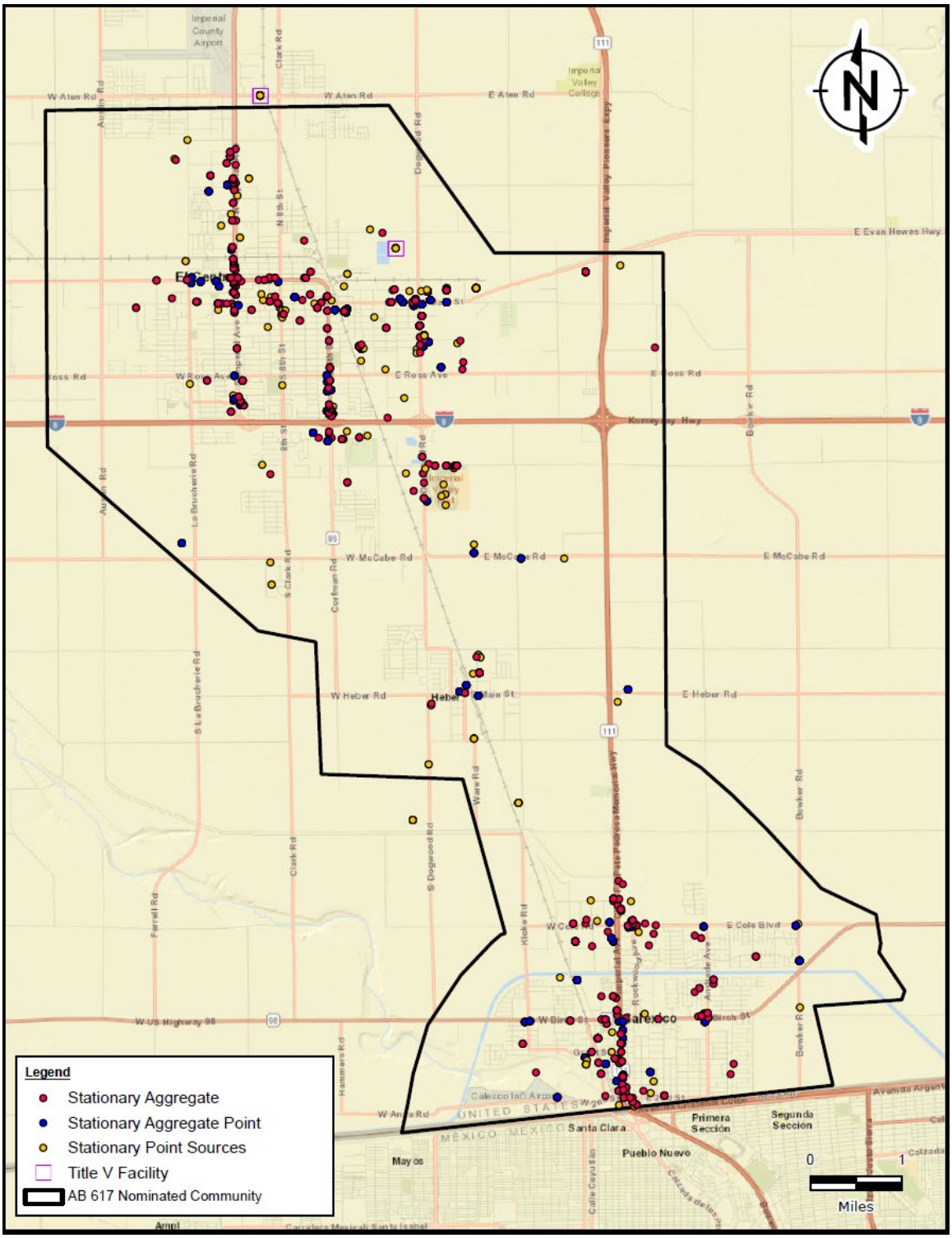
Notes:
[1] Units are in tons per year.

Table 3.5. Base Year (2017) Community-Level Emissions Inventory – Stationary Source Toxic Air Contaminants

Toxic Air Contaminant[1] (TAC)	Mass Emissions (lbs/yr)	Toxicity-Weighted Emissions[2]		
		Cancer Risk Weighted Emissions	Chronic Non-Cancer Risk Weighted Emissions	Acute Non-Cancer Risk Weighted Emissions
DPM	282.27	652.05	0.97	0.00
Nickel	287.10	574.78	351.16	245.81
Benzene	1,807.05	403.51	10.31	11.46
Arsenic	4.86	123.50	5.55	4.16
1,3-Butadiene	77.44	101.37	0.66	0.02

Notes:
[1] Only the top five TAC based on cancer risk toxicity-weighted emissions are shown. A full list of TAC emissions can be found in Appendix D.
[2] Toxicity weighted emissions consider the risk posed by the toxic pollutant. They are calculated by multiplying mass emissions by the pollutant's toxicity factor (e.g., cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

Figure 3.9. Stationary Source Locations in the El Centro-Heber-Calexico Corridor



3.2.2.2 Area-Wide Sources

Area-wide sources are emission sources that occur over a large geographic area. Examples of area-wide sources include: architectural coatings, farming operations, and road dust. The CAP and TAC emission estimates for the area-wide sources are based on the statewide emission inventory that was developed for the 2016 California SIP, which uses 2012 as a base year.[28] This is the same inventory that was used for the development of the Imperial County SIPs for O_3 and $PM_{2.5}$.[29,30] The current methodology for each area-wide source category can be found on CARB's Area Source Methodologies page.[31]

The emissions for the 2016 California SIP had been allocated to 4-kilometer (km) grids throughout the state using spatial surrogates and area sources found within each grid. For this community-level emissions inventory, the inventory was further refined to 1-km grids. Grid cells located within the Corridor were included in the community-level emissions inventory. For grid cells that were partially within the Corridor boundary, the portion of the emissions within the Community was calculated based on the portion of the grid cell area located within the Corridor. Lastly, area-wide emissions were projected to 2017 using growth and control parameters specific to the Community. Details on the spatial allocation of emissions and baseline/forecasted inventory development are included in the emissions inventory chapters of the ICAPCD O_3 and $PM_{2.5}$ SIPs.

To develop the projected CAP and TAC emissions for 2024 and 2029, CARB staff obtained emissions data for Imperial County from CEPAM version 1.05 and calculated county-level emission scalars between the base year and the two target future years. The calculated emission scalar was then applied to the 2017 community base year inventory to get the 2024 and 2029 future baseline inventories. As possible, growth and control factors were reviewed for stationary and area-wide categories. Year to year trends were compared to similar and past datasets to ensure general consistency. Emissions for specific categories were checked to confirm they reflect the anticipated effects of applicable control measures. Mobile categories were verified with CARB's mobile source staff for consistency with CARB's on-road and off-road emission models.

A summary of the area-wide base year CAP emissions in the Corridor is presented in Table 3.6. Forecasted CAP and TAC emissions for 2024 and 2029 are shown in Appendix D. Base year toxicity-weighted emissions for the top five TACs for all area-wide sources are shown in Table 3.7.

[28] CARB. 2018. 2016 State Strategy for the State Implementation Plan for Federal Ozone and $PM_{2.5}$ Standards (State SIP Strategy). Available at: https://ww3.arb.ca.gov/planning/sip/2016sip/2016sip.htm. Accessed: August 2019.

[29] ICAPCD. 2017. Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard, Available at: https://ww3.arb.ca.gov/planning/sip/planarea/imperial/2017o3sip_final.pdf. Accessed: August 2019.

[30] ICAPCD. 2018. Imperial County 2018 Annual $PM_{2.5}$ State Implementation Plan, Available at: https://ww3.arb.ca.gov/planning/sip/planarea/imperial/final_2018_ic_pm25_sip.pdf. Accessed: August 2019.

[31] CARB. 2014. Area-Wide Source Methodologies. Available at: https://ww3.arb.ca.gov/ei/areasrc/areameth.htm. Accessed: August 2019.

Table 3.6. Base Year (2017) Community-Level Emissions Inventory – Area-Wide Source Criteria Air Pollutants

	NO_X	TOG	ROG	SO_X	PM_{10}	$PM_{2.5}$	DPM
AREA-WIDE SOURCES TOTAL[1]	**160.59**	**511.20**	**339.34**	**1.69**	**1909.00**	**271.10**	**0.03**
FUEL COMBUSTION	**142.86**	**11.45**	**5.08**	**0.65**	**14.12**	**14.09**	**0.03**
SERVICE AND COMMERCIAL	*142.24*	*11.37*	*5.00*	*0.64*	*14.08*	*14.05*	*0.00*
FOOD AND AGRICULTURAL PROCESSING	*0.63*	*0.09*	*0.08*	*0.00*	*0.03*	*0.03*	*0.03*
INDUSTRIAL PROCESSES	**0.01**	**0.00**	**0.00**	**0.00**	**2.44**	**0.70**	**0.00**
FOOD AND AGRICULTURE	*0.01*	*0.00*	*0.00*	*0.00*	*2.44*	*0.70*	*0.00*
MISCELLANEOUS PROCESSES	**17.71**	**161.93**	**26.58**	**1.04**	**1892.44**	**256.31**	**0.00**
RESIDENTIAL FUEL COMBUSTION	*14.07*	*11.22*	*5.10*	*0.43*	*5.76*	*5.59*	*0.00*
MANAGED BURNING AND DISPOSAL	*3.53*	*11.45*	*10.01*	*0.62*	*10.46*	*9.97*	*0.00*
FIRES	*0.12*	*0.42*	*0.36*	*0.00*	*0.39*	*0.36*	*0.00*
FARMING OPERATIONS	*0.00*	*138.84*	*11.11*	*0.00*	*59.36*	*9.67*	*0.00*
PAVED ROAD DUST	*0.00*	*0.00*	*0.00*	*0.00*	*42.35*	*6.35*	*0.00*
FUGITIVE WINDBLOWN DUST	*0.00*	*0.00*	*0.00*	*0.00*	*1274.04*	*174.39*	*0.00*
UNPAVED ROAD DUST	*0.00*	*0.00*	*0.00*	*0.00*	*288.75*	*28.86*	*0.00*
CONSTRUCTION AND DEMOLITION	*0.00*	*0.00*	*0.00*	*0.00*	*211.34*	*21.12*	*0.00*
OTHER (MISCELLANEOUS PROCESSES)	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*
SOLVENT EVAPORATION	**0.00**	**337.82**	**307.69**	**0.00**	**0.00**	**0.00**	**0.00**
PESTICIDES/FERTILIZERS	*0.00*	*14.51*	*14.51*	*0.00*	*0.00*	*0.00*	*0.00*
CONSUMER PRODUCTS	*0.00*	*229.29*	*201.23*	*0.00*	*0.00*	*0.00*	*0.00*
ARCHITECTURAL COATINGS AND RELATED PROCESS SOLVENTS	*0.00*	*91.03*	*88.96*	*0.00*	*0.00*	*0.00*	*0.00*
ASPHALT PAVING / ROOFING	*0.00*	*2.99*	*2.99*	*0.00*	*0.00*	*0.00*	*0.00*

Notes:
[1] Units are in tons per year.

Table 3.7. Base Year (2017) Community-Level Emissions Inventory – Area-Wide Source Toxic Air Contaminants

Toxic Air Contaminant[1] (TAC)	Mass Emissions (lbs/yr)	Toxicity-Weighted Emissions[2]		
		Cancer Risk Weighted Emissions	Chronic Non-Cancer Risk Weighted Emissions	Acute Non-Cancer Risk Weighted Emissions
Cadmium	145.24	4,697.17	124.35	0.00
Arsenic	103.09	2,619.58	117.69	88.26
Nickel	383.12	767.02	468.60	328.02
p-Dichlorobenzene	5,051.53	427.86	0.11	0.00
Lead	4,113.33	380.07	0.00	0.00

Notes:
[1] Only the top five TAC based on cancer risk toxicity-weighted emissions are shown. A full list of TAC emissions can be found in Appendix D.
[2] Toxicity weighted emissions consider the risk posed by the toxic pollutant. They are calculated by multiplying mass emissions by the pollutant's toxicity factor (e.g., cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

3.2.2.3 On-Road Mobile Sources

On-road mobile sources include vehicles that travel on roads for the transportation of passengers or freight. The Vehicle Emissions on Each Road (VEER) approach, developed by CARB, was used to assign on-road vehicle emissions to every road within the El Centro-Heber-Calexico Corridor. The VEER approach spatially allocates vehicle activity data used in the latest adopted regional transportation plans from the local metropolitan planning organization (MPO) onto roadways from the U.S. Census Bureau's Topologically Integrated Geographic Encoding and Referencing (TIGER) road network.[32] Vehicle activity data (base year 2012 projected to 2017) – for buses, light duty vehicles (LDV), light-heavy duty vehicles (LHDV), medium-heavy duty vehicles (MHDV), and heavy-heavy duty vehicles (HHDV) – was based on data from Southern California Association of Governments (SCAG) in its adopted 2016 Regional Transportation Plan/Sustainable Communities Strategy. The TIGER network represents the complete roadway network, whereas the SCAG road network only captures a rough approximation of the actual roadway network. Functional road types from the SCAG and TIGER network are broken into four categories (major roads, major arterials, minor arterials, and local/residential roads). The vehicle activity in terms of vehicle miles travelled (VMT) was spatially allocated from the SCAG network onto the TIGER network for each road type using ArcGIS. Separating the road types into four categories allows similar VMT roads to be processed together, thus eliminating a possible bias in VMT allocation from high VMT roads onto low VMT roads and vice versa. The locations of the roadway links in the Corridor are shown in Figure 3.10.

CAP emissions were estimated by applying existing county-level aggregated emission factors and vehicle distribution from CARB's on-road mobile source EMission FACtor model version 2017 (EMFAC2017) to the spatially allocated VMT on each road link.[33] EMFAC2017 vehicle categories were assigned to SCAG vehicle categories as shown in Table 3.8. TAC emissions were estimated by applying CARB's chemical speciation profiles to the TOG and PM emissions estimated for each road link.[34]

The on-road mobile inventory was forecasted using vehicle activity data in terms of VMT and CAP emission factor data for future years from EMFAC2017. EMFAC2017 contains forecasted VMT

[32] Census Bureau's Topologically Integrated Geographic Encoding and Referencing (TIGER) road network (https://tigerweb.geo.census.gov/tigerweb/)
[33] EMFAC2017 includes information on California's car and truck fleet (e.g., vehicle population, age) and also reflects the emissions benefits of CARB's previously adopted on-road mobile source regulations (e.g., Pavley Standards, Advanced Clean Cars, Truck and Bus, other on-road diesel fleet rules). For more information on EMFAC2017, see https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-iii-technical-documentation.pdf
[34] California Air Resources Board, Speciation Profiles Used in ARB Modeling, https://ww3.arb.ca.gov/ei/speciate/speciate.htm#filelist. Accessed: August 2019

and CAP emission factors for each year through 2050. The future year emission factors reflect fleet turnover and emission benefits from on-road mobile source regulations that have been adopted prior to the release of EMFAC2017. However, CARB has since adopted four additional on-road vehicle emission regulations that provide additional emission reductions in future years (see Table 3.9). The emission reductions from these four regulations were also applied to the relevant vehicle categories and emission processes (e.g., exhaust, evaporative, brake wear) to obtain the forecasted inventories in 2024 and 2029.

EMFAC2017 VMT for Imperial County was used to estimate vehicle activity in the Corridor for future years. This was done by calculating the growth rate of the county VMT from the 2017 base year to the target forecast years (2024 and 2029) and applying that growth rate to the base year VMT in the Corridor. Once the on-road VMT for future years was established in the Corridor, CAP emissions for 2024 and 2029 were calculated by applying the year-specific emission factors from EMFAC2017, as well as the additional emission reductions from the four new adopted regulations. TAC emissions for on-road mobile sources were obtained by applying CARB's chemical speciation profiles to the forecasted on-road mobile source TOG and PM emissions.

A summary of the on-road mobile source base year CAP emissions in the Corridor is presented in Table 3.10. Forecasted CAP and TAC emissions for 2024 and 2029 are shown in Appendix D. Base year toxicity-weighted on-road mobile source TAC emissions for the top five TAC are shown in Table 3.11.

Table 3.8. Vehicle Class Mapping

SCAG Vehicle Category	EMFAC Vehicle Category	
LDV	LDA	MDV
	LDT1	MCY
	LDT2	
LHDV	LHD1	LHD2
MHDV	T6 Ag	T6 instate small
	T6 CAIRP heavy	T6 OOS heavy
	T6 CAIRP small	T6 OOS small
	T6 instate construction heavy	T6 Public
	T6 instate construction small	T6 utility
	T6 instate heavy	T6TS
HHDV	T7 Ag	T7 POAK
	T7 CAIRP	T7 POLA
	T7 CAIRP construction	T7 Public
	T7 NNOOS	T7 Single
	T7 NOOS	T7 single construction

Table 3.8. Vehicle Class Mapping

SCAG Vehicle Category	EMFAC Vehicle Category	
	T7 other port	T7 SWCV
	T7 tractor	T7IS
	T7 tractor construction	PTO
	T7 utility	
Bus	SBUS	All Other Buses
	UBUS	MH
	OBUS	Motor Coach

Table 3.9. On-Road Mobile Source Regulations Adopted after EMFAC2017 Release

Regulation	Fuel Type	Pollutant	Percent Reduction Benefits	
			2024	2029
Amendments to Smoke Opacity Regulation[1]	Diesel	$PM_{2.5}$	24.1%	25.3%
Amendments to Heavy Duty Engine Warranty Requirements[2]	Diesel	$PM_{2.5}$	0.3%	1.6%
		NO_X	0.2%	1.0%
Innovative Clean Transit[3]	Gasoline, Diesel, Natural Gas	$PM_{2.5}$	0.9%	13.9%
		NO_X	14.1%	38.5%
Zero Emission Airport Shuttle Buses[4]	*Not Considered*			

Notes:
[1] California Air Resources Board, https://ww2.arb.ca.gov/rulemaking/2018/heavy-duty-vehicle-inspection-program-and-periodic-smoke-inspection-program. Accessed: August 2019.
[2] California Air Resources Board, https://ww2.arb.ca.gov/rulemaking/2018/hd-warranty-2018. Accessed: August 2019.
[3] California Air Resources Board, https://ww2.arb.ca.gov/rulemaking/2018/innovative-clean-transit-2018. Accessed: August 2019.
[4] This regulation was excluded from community inventory development because the current AB 617 communities do not have any airport related shuttle buses. California Air Resources Board https://ww2.arb.ca.gov/index.php/rulemaking/2019/asb19. Accessed: August 2019.

Table 3.10. Base Year (2017) Community-Level Emissions Inventory – On-Road Mobile Source Criteria Air Pollutants

	NO_X	TOG	ROG	SO_X	PM_{10}	$PM_{2.5}$	DPM
ON-ROAD MOBILE SOURCES TOTAL[1]	**277.44**	**166.35**	**153.38**	**2.20**	**30.33**	**14.44**	**3.44**
BUS	18.04	1.68	1.42	0.06	1.47	0.78	0.29
HHDV	108.22	4.73	4.15	0.29	4.18	2.81	2.18
LDV	107.19	152.81	141.17	1.73	22.28	9.37	0.06
LHDV	18.42	4.37	4.15	0.05	0.75	0.36	0.10
MHDV	25.56	2.76	2.48	0.07	1.65	1.12	0.80

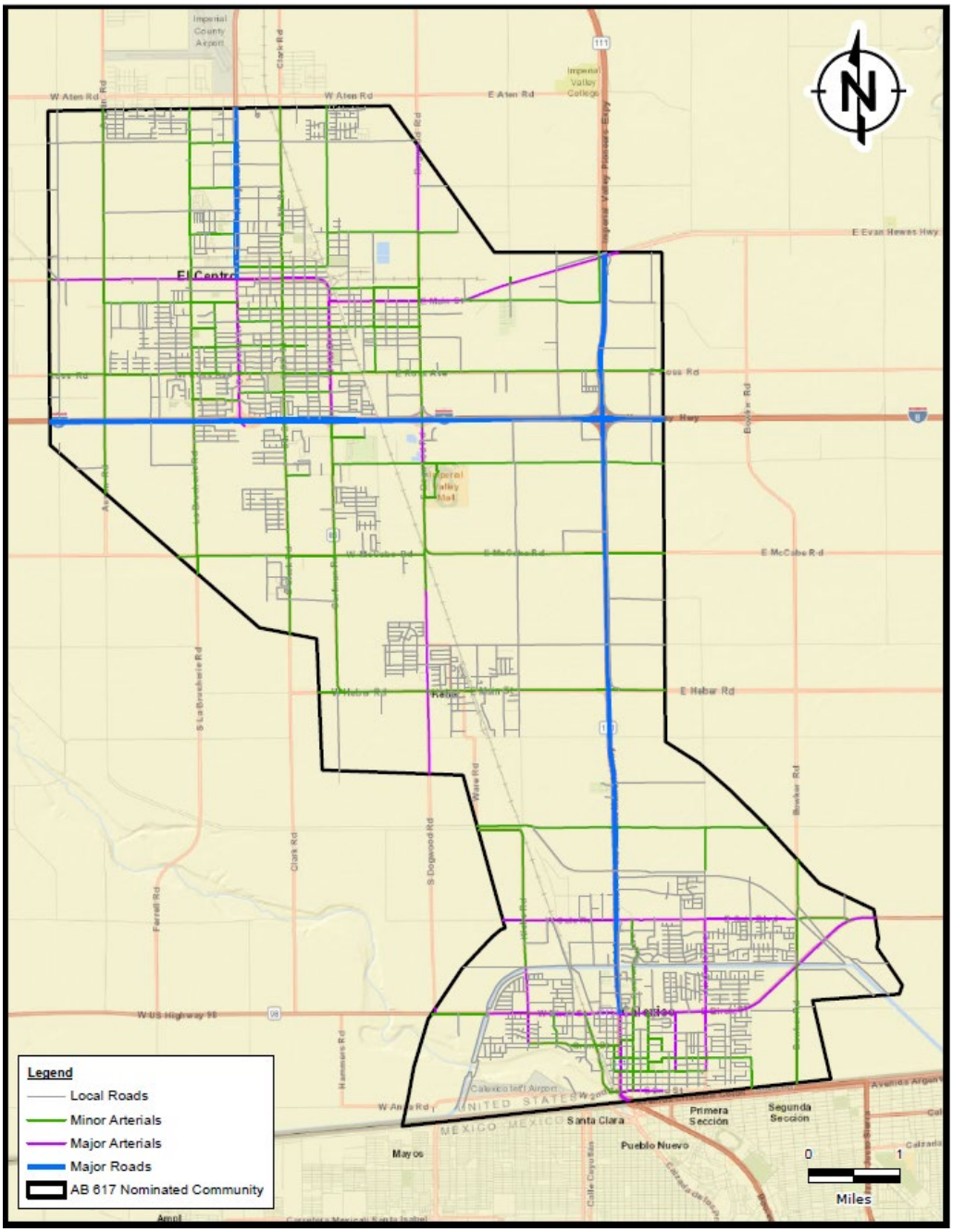
Notes:
[1] Units are in tons per year.

Table 3.11. Base Year (2017) Community-Level Emissions Inventory – On-Road Mobile Source Toxic Air Contaminants

Toxic Air Contaminant[1] (TAC)	Mass Emissions (lbs/yr)	Toxicity-Weighted Emissions[2]		
		Cancer Risk Weighted Emissions	Chronic Non-Cancer Risk Weighted Emissions	Acute Non-Cancer Risk Weighted Emissions
DPM	6,874.10	15,879.16	23.54	0.00
Benzene	7,535.90	1,682.77	43.01	47.79
1,3-Butadiene	794.13	1,039.51	6.80	0.21
Formaldehyde	4811.97	222.31	9.16	14.98
Naphthalene	283.78	74.29	0.54	0.00

Notes:
[1] Only the top five TAC based on cancer risk toxicity-weighted emissions are shown. A full list of TAC emissions can be found in Appendix D.
[2] Toxicity weighted emissions consider the risk posed by the toxic pollutant. They are calculated by multiplying mass emissions by the pollutant's toxicity factor (e.g., cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

Figure 3.10. TIGER Census Roadway Map for the El Centro-Heber-Calexico Corridor



3.2.2.4 Off-Road Mobile Sources

Types of off-road mobile sources include: aircraft, trains, farm equipment, construction equipment, and boats. The CAP and TAC emission estimates for off-road equipment in this community-level emission inventory are based on the statewide emission inventory developed for the 2016

California SIP.[35] Emission estimates vary per vehicle or equipment type. Methodologies for each can be found on CARB's Emission Inventory Documentation page.[36]

The emissions for the 2016 California SIP had been allocated to 4- km grids throughout the state using spatial surrogates and off-road sources found within each grid. For this community-level emissions inventory, the inventory was further refined to 1-km grids. Grid cells located within the Corridor were included in the community-level emissions inventory. For grid cells that were partially within the Corridor boundary, the portion of the emissions within the Community was calculated based on the portion of the grid cell area located within the Corridor. Lastly, off-road mobile emissions were projected to 2017 using growth and control parameters specific to the Community. Details on the spatial allocation of emissions and baseline/forecasted inventory development are included in the emissions inventory chapters of the ICAPCD O_3 and $PM_{2.5}$ SIPs.

To develop the projected CAP and TAC emissions for 2024 and 2029, CARB staff obtained emissions data for Imperial County from CEPAM version 1.05 and calculated county-level emission scalars between the base year and the two target future years. The calculated emission scalar was then applied to the 2017 community base year inventory to get the 2024 and 2029 future baseline inventories. Year to year trends were compared to similar and past datasets to ensure general consistency. Emissions for specific categories were checked to confirm they reflect the anticipated effects of applicable control measures. Mobile categories were verified with CARB's mobile source staff for consistency with CARB's on-road and off-road emission models.

A summary of the off-road CAP emissions in the Corridor is presented in Table 3.12. Forecasted CAP and TAC emissions for 2024 and 2029 are shown in Appendix D. Toxicity-weighted emissions for the top five TACs for off-road sources are shown in Table 3.13.

Table 3.12. Base Year (2017) Community-Level Emissions Inventory – Off-Road Mobile Source Criteria Air Pollutants

	NO_X	TOG	ROG	SO_X	PM_{10}	$PM_{2.5}$	DPM
OFF-ROAD MOBILE SOURCES TOTAL[1]	**244.63**	**158.00**	**151.98**	**3.05**	**13.79**	**13.01**	**8.22**
AIRCRAFT	**23.54**	**17.63**	**17.62**	**2.73**	**3.44**	**3.41**	**0.00**
JET AIRCRAFT - COMMERCIAL	23.27	15.45	15.45	2.65	3.35	3.32	0.00
JET AIRCRAFT - CIVIL	0.25	2.07	2.07	0.06	0.09	0.09	0.00
AGRICULTURAL AIRCRAFT (CROP DUSTING)	*0.03*	*0.11*	*0.10*	*0.02*	*0.01*	*0.01*	*0.00*
FARM EQUIPMENT	**14.58**	**2.97**	**2.60**	**0.00**	**0.86**	**0.79**	**0.83**
AGRICULTURAL EQUIPMENT	*14.58*	*2.97*	*2.60*	*0.00*	*0.86*	*0.79*	*0.83*
FUEL STORAGE AND HANDLING	**0.00**	**12.94**	**12.94**	**0.00**	**0.00**	**0.00**	**0.00**
GASOLINE CANS	*0.00*	*12.94*	*12.94*	*0.00*	*0.00*	*0.00*	*0.00*

[35] CARB. 2018. 2016 State Strategy for the State Implementation Plan for Federal Ozone and PM2.5 Standards (State SIP Strategy). Available at: https://ww3.arb.ca.gov/planning/sip/2016sip/2016sip.htm. Accessed: August 2019.

[36] CARB. 2017. Emission Inventory Documentation. Available at: https://ww3.arb.ca.gov/ei/documentation.htm. Accessed: August 2019.

Table 3.12. Base Year (2017) Community-Level Emissions Inventory – Off-Road Mobile Source Criteria Air Pollutants

	NO_X	TOG	ROG	SO_X	PM_{10}	$PM_{2.5}$	DPM
OFF-ROAD EQUIPMENT	**206.25**	**70.56**	**65.70**	**0.32**	**9.45**	**8.77**	**7.39**
COMMERCIAL (OTHER)	*128.50*	*13.40*	*11.38*	*0.22*	*4.31*	*3.98*	*4.20*
CONSTRUCTION AND MINING EQUIPMENT	*48.49*	*5.82*	*4.97*	*0.05*	*2.47*	*2.28*	*2.33*
TRANSPORT REFRIGERATION UNITS	*16.07*	*1.77*	*1.49*	*0.00*	*0.54*	*0.49*	*0.54*
INDUSTRIAL EQUIPMENT	*4.09*	*0.83*	*0.68*	*0.01*	*0.29*	*0.27*	*0.24*
COMMERCIAL (COMMERCIAL)	*2.19*	*5.45*	*5.24*	*0.01*	*0.81*	*0.78*	*0.00*
LAWN AND GARDEN (OTHER)	*1.83*	*0.67*	*0.64*	*0.00*	*0.07*	*0.07*	*0.07*
COMMERCIAL (RESIDENTIAL)	*1.60*	*4.11*	*3.96*	*0.01*	*0.31*	*0.30*	*0.00*
LAWN AND GARDEN (COMMERCIAL)	*1.57*	*16.13*	*15.33*	*0.01*	*0.34*	*0.32*	*0.00*
LAWN AND GARDEN (RESIDENTIAL)	*1.04*	*22.25*	*21.92*	*0.01*	*0.28*	*0.26*	*0.00*
OTHER	*0.86*	*0.11*	*0.09*	*0.00*	*0.03*	*0.03*	*0.03*
AIRPORT GROUND SUPPORT EQUIPMENT	*0.02*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*
OFF-ROAD RECREATIONAL VEHICLES	**0.20**	**36.78**	**36.72**	**0.00**	**0.03**	**0.03**	**0.00**
ALL-TERRAIN VEHICLES (ATV'S)	*0.10*	*19.75*	*19.73*	*0.00*	*0.01*	*0.01*	*0.00*
OFF-ROAD MOTORCYCLES	*0.09*	*16.70*	*16.66*	*0.00*	*0.02*	*0.02*	*0.00*
SPECIALTY VEHICLES CARTS	*0.00*	*0.24*	*0.24*	*0.00*	*0.00*	*0.00*	*0.00*
MINIBIKES	*0.00*	*0.09*	*0.09*	*0.00*	*0.00*	*0.00*	*0.00*
RECREATIONAL BOATS	**0.00**	**17.12**	**16.40**	**0.00**	**0.00**	**0.00**	**0.00**
RECREATIONAL BOATS	*0.00*	*17.12*	*16.40*	*0.00*	*0.00*	*0.00*	*0.00*
TRAINS	**0.06**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
PASSENGER TRAINS	*0.06*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*

Notes:
[1] Units are in tons per year.

Table 3.13. Base Year (2017) Community-Level Emissions Inventory – Off-Road Mobile Source Toxic Air Contaminants

Toxic Air Contaminant[1] (TAC)	Mass Emissions (lbs/yr)	Toxicity-Weighted Emissions[2]		
		Cancer Risk Weighted Emissions	Chronic Non-Cancer Risk Weighted Emissions	Acute Non-Cancer Risk Weighted Emissions
DPM	16,447.67	37,994.12	56.33	0.00
1,3-Butadiene	1,167.51	1,528.27	10.00	0.30
Benzene	4,517.05	1,008.66	25.78	28.65
Formaldehyde	12,700.88	586.78	24.16	39.54
Acetaldehyde	5,380.59	111.86	0.66	1.96

Notes:
[1] Only the top five TAC based on cancer risk toxicity-weighted emissions are shown. A full list of TAC emissions can be found in Appendix D.
[2] Toxicity weighted emissions consider the risk posed by the toxic pollutant. They are calculated by multiplying mass emissions by the pollutant's toxicity factor (e.g., cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

3.2.3 Source Attribution Analysis

The purpose of a source attribution analysis is to assess, identify, and estimate the relative contribution of sources or categories of sources to elevated exposures of air pollution in a community. It can be used to aid in the development of emission reduction targets and strategies and differentiate between pollution originating from sources within a community versus those attributable to regional sources (i.e., background pollution). Source attribution can be performed using a variety of technical approaches, including: community inventory ratios, community-specific air quality modeling, targeted air monitoring/back trajectory/pollution roses/inverse modeling, chemical mass balance, and Positive Matrix Factorization (PMF).

3.2.3.1 Previous Analyses

Certain technical analyses conducted for the ICAPCD 2018 SIP for the Annual $PM_{2.5}$ NAAQS involved a type of source attribution analysis.[37] Those analyses were conducted as part of the Clean Air Act Part D Subpart 179(B) Technical Demonstration which showed that the implementation plan would be adequate to attain and maintain the NAAQS but for transport of emissions from Mexico. Specifically, the technical demonstration included an evaluation of the impact of Mexicali emissions on the Calexico $PM_{2.5}$ monitor through an evaluation of monitoring data, meteorological conditions, and emissions in the border region. Additionally, CARB staff analyzed speciated particulate matter data and conducted a source attribution analysis using PMF.

Elemental species concentrations were compared at the three $PM_{2.5}$ monitoring sites in Imperial County: the Brawley site (~22 miles north of the border), the El Centro site (~9 miles north of the border), and the Calexico site. Sample analysis from the monitor located in Calexico indicates that PM is comprised primarily of carbonaceous aerosols (organic matter plus elemental carbon) (45%), geological material (21%), ammonium nitrate (13%), ammonium sulfate (14%), and elemental species (7%). Results from X-Ray fluorescence analyses performed at all three sites indicated that elemental species concentrations increased with proximity to the border. Concentrations of non-geological elemental species were 4 and 6 times lower at the El Centro and Brawley sites, respectively, than at Calexico indicating that circumstances unique to Calexico make a significant contribution to the elemental species concentrations. Activities known to occur in the Mexicali area, including a substantial number of manufacturing and assembly plants

[37] ICAPCD. 2018. Imperial County 2018 Annual Particulate Matter Less Than 2.5 Microns in Diameter State Implementation Plan. Available at: https://www.co.imperial.ca.us/AirPollution/otherpdfs/2018-IC-PM25SIP.pdf. Accessed: August 2019.

(maquiladoras), small-scale brickyards, and uncontrolled combustion of refuse and other materials, suggest that the unusually high measurements of $PM_{2.5}$ elemental species in Calexico are likely due to transport from Mexicali.

The source attribution analysis included data from the Calexico monitor from 2011 and between September 2014 and August 2015.[38] PMF identified seven major sources of $PM_{2.5}$ in Calexico: airborne soil (24%), biomass burning (19%), mobile (16%), secondary sulfate (15%), secondary nitrate (11%), refuse burning (11%), and industrial sources (4%). Airborne soil contributed the highest levels in spring and fall quarters when average wind speeds are seasonally elevated. High values of biomass burning were measured in the winter and summer months, indicating a strong influence of burning for space heating and field burning of crop residues, respectively. The analysis noted higher contributions of refuse burning in the winter, consistent with wintertime bonfires. Lastly, the measured contributions from industry exhibited elevated concentrations of iron, lead, and zinc. Potential sources of these metals were identified in Mexicali, including metal processing operations, brick kilns, cement kilns, and various incinerators.

As discussed above, in the source attribution analysis biomass burning was found to be the second largest contributor to $PM_{2.5}$ at the Calexico monitor. CARB's analysis suggests that bans on biomass burning in quarters 2 and 4 would be slightly more effective in reducing ambient $PM_{2.5}$ concentrations than restrictions solely applied in the winter season. Additionally, source direction analyses showed that $PM_{2.5}$ contributions from mobile sources and secondary nitrate precursor emissions had strong southwest source directionality suggesting contributions from the Calexico West Port-of-Entry. CARB's analysis suggests that reduction or elimination of idling times in the winter has the potential to reduce the $PM_{2.5}$ emissions below the annual $PM_{2.5}$ standard of 12.0 $\mu g/m^3$.

Ultimately, the evaluation concluded that 15 percent of the $PM_{2.5}$ in Calexico was contributed by sources that are not found in Imperial County (i.e. refuse burning and certain industrial sources), and that most of the $PM_{2.5}$ from mobile and secondary nitrate sources originated from the United States-Mexico border crossing area.

3.2.3.2 New Analyses

One method for source attribution is the community inventory ratio technical approach. This approach compares the ratios of source-specific emissions to determine the relative contribution of each source or class of sources to the overall emissions impacting a community. The community inventory ratio analysis in this Plan relies on the community-level emissions inventory developed by CARB (see Section 3.2.2) and focuses on $PM_{2.5}$ and TAC emissions as they directly relate to the health-based air quality objectives in Section 1.3.1.

As shown in Figure 3.11 below, the majority of $PM_{2.5}$ emissions in the Corridor are generated by area-wide sources (78%), followed by stationary sources (14%). A breakdown of emissions contributions to each category is shown in Figures 3.12 through 3.15. The top five contributors to the Community's $PM_{2.5}$ emissions are fugitive windblown dust (50.2%), fuel combustion from

[38] Data from the intervening periods was determined to be invalid.

stationary and area-wide sources (8.8%), unpaved road dust (8.3%), cooking (6.3%), and construction and demolition (6.1%).

Figure 3.11. Base Year (2017) $PM_{2.5}$ Emission Contribution to Community-Level Inventory Total by Source Category

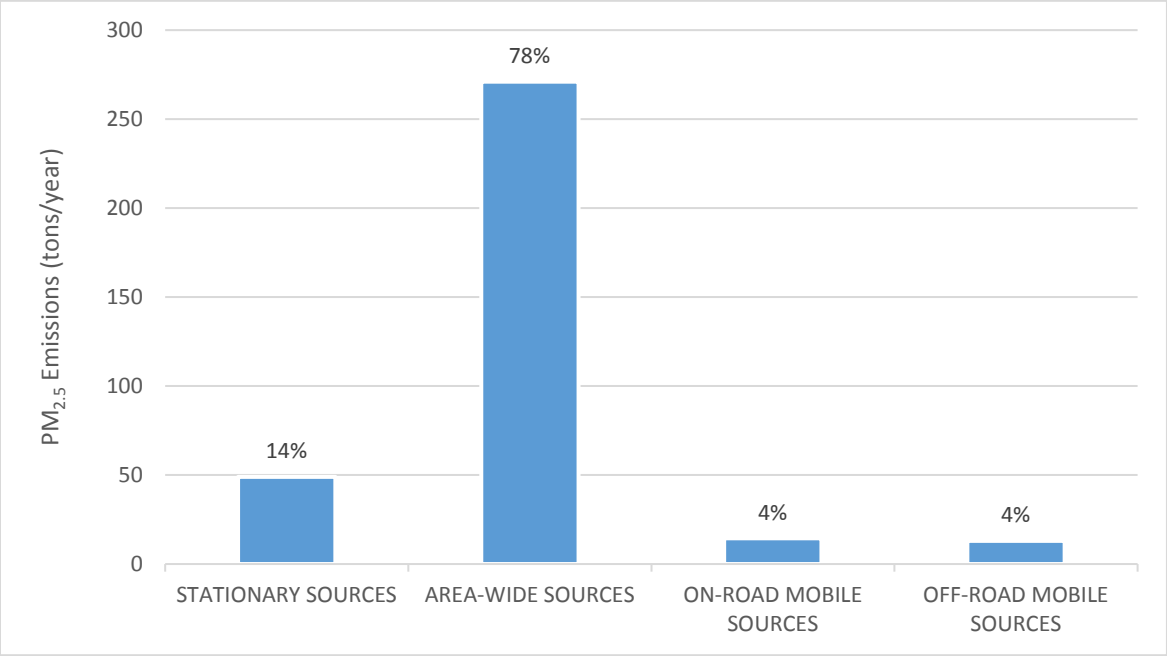


Figure 3.12. Base Year (2017) $PM_{2.5}$ Emission Contribution to Stationary Source Category Total

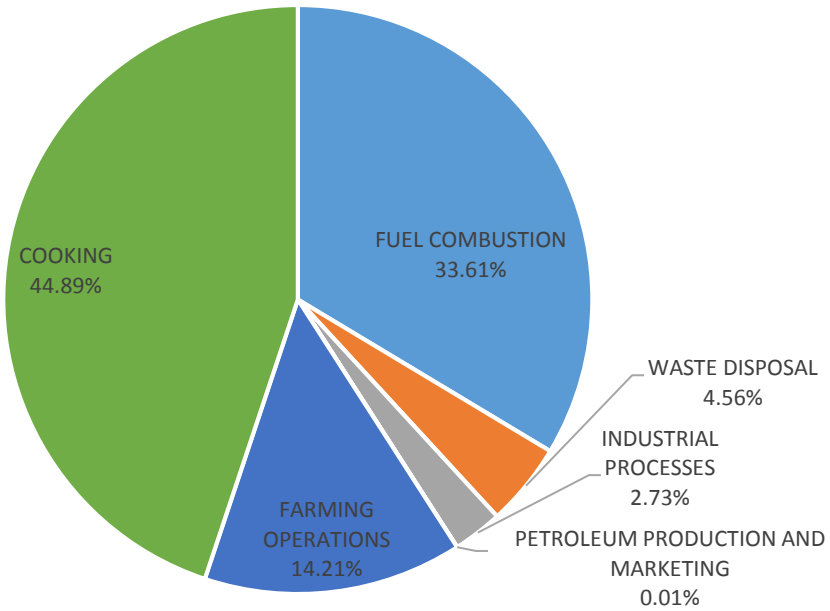


Figure 3.13. Base Year (2017) $PM_{2.5}$ Emission Contribution to Area-wide Source Category Total

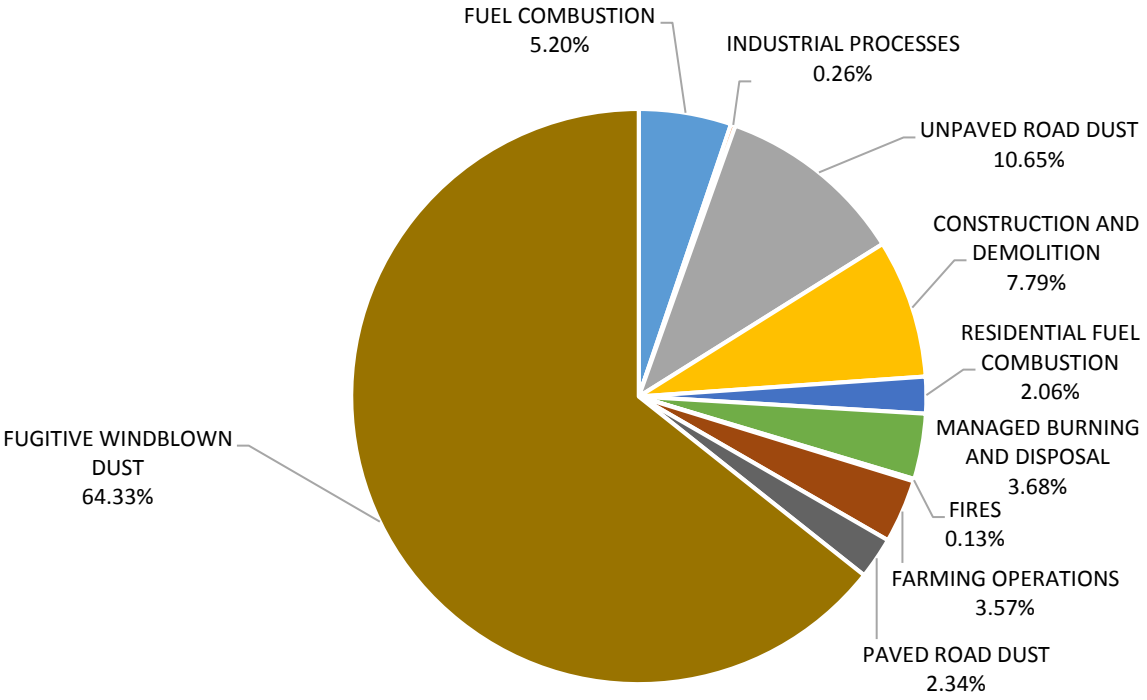


Figure 3.14. Base Year (2017) $PM_{2.5}$ Emission Contribution to On-Road Mobile Source Category Total

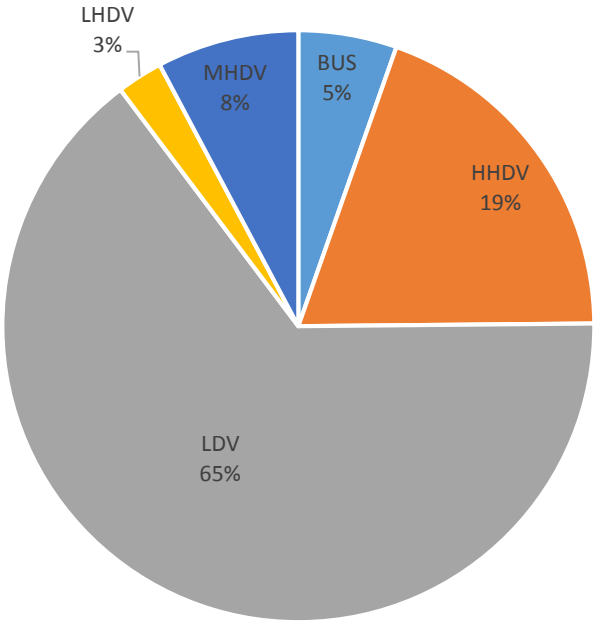
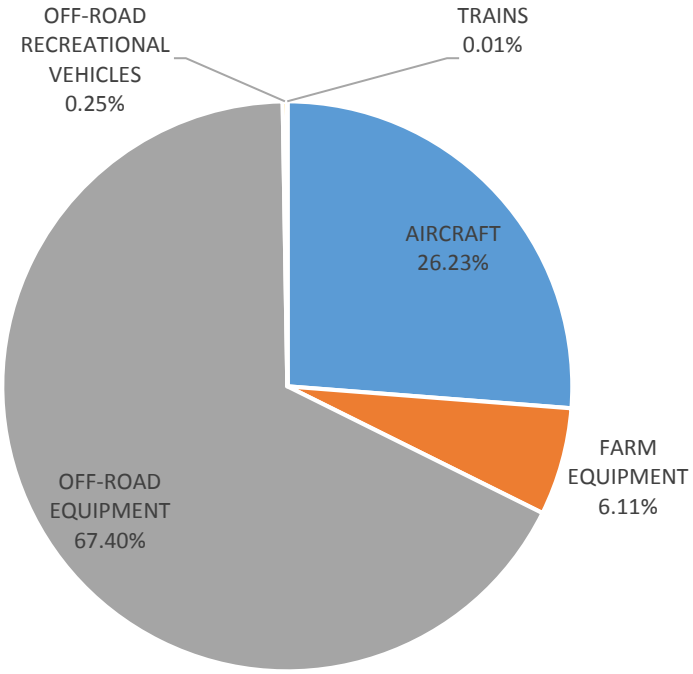


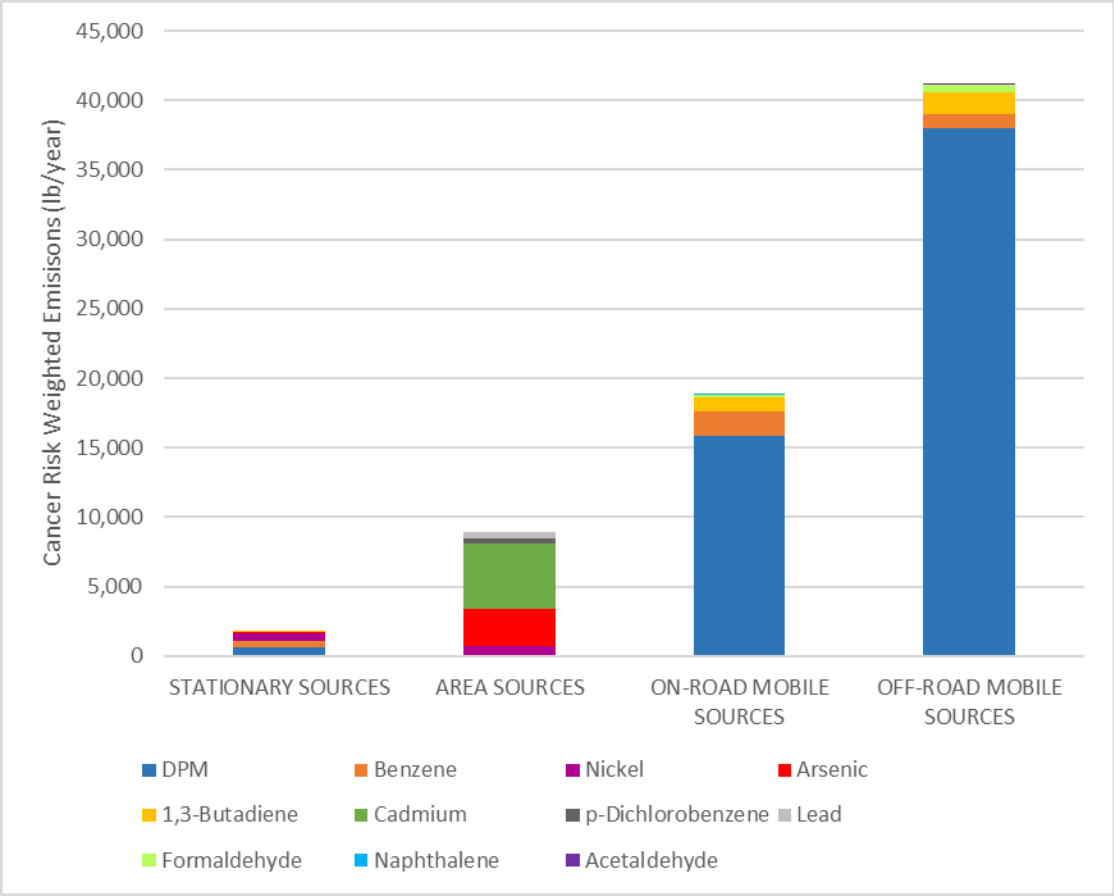
Figure 3.15. Base Year (2017) $PM_{2.5}$ Emission Contribution to Off-Road Mobile Source Category Total



The previous PMF source attribution analysis described in Section 3.2.3.1 identifies the top contributors to $PM_{2.5}$ emissions in Calexico as airborne soil (24%), biomass burning (19%), mobile sources (16%), secondary sulfate (15%), secondary nitrate (11%), refuse burning (11%), and industrial sources (4%). In comparison, the top contributors identified in the community inventory ratio analysis are fugitive windblown dust (50.2%), fuel combustion (8.8%), unpaved road dust (8.3%), mobile sources (7.9%, including both on-road and off-road sources), cooking (6.3%), and construction and demolition (6.1%). There are several similarities in the findings of the two analyses. To start, airborne soil (i.e., fugitive windblown dust and unpaved road dust) are identified as the largest contributors of $PM_{2.5}$ in both analyses. In addition, mobile sources and fuel combustion (which can lead to the formation of secondary sulfate and secondary nitrate) are identified as top contributors in both analyses. Certain categories, such as biomass burning and refuse burning, only appear as top contributors in the PMF analysis; however, that could be because the PMF analysis can capture the effects of international emissions, whereas the community inventory ratio analysis does not. This finding makes sense, in that both biomass burning and refuse burning are known emission sources just south of the border.

The community-level emissions inventory in Section 3.2.2 provides TAC emissions in both raw and toxicity-weighted formats. The benefit of the toxicity-weighted format is that it allows for a direct comparison between TACs of differing risk/toxicity levels. Figure 3.16 shows the contribution of the top five TAC in each source category to the base year (2017) cancer risk-weighted emissions in the Community. As shown in this figure, the largest contributor to cancer risk is DPM from off-road mobile sources, followed by DPM from on-road mobile sources and cadmium from area-wide sources.

Figure 3.16. Base Year (2017) TAC Emissions Contribution to Cancer Risk Weighted TAC Emissions



3.2.4 Existing Air Quality Policies and Programs

3.2.4.1 County Policies and Programs

The Clean Air Act, established by the USEPA in 1970, regulates air emissions from stationary and mobile sources. Among other things, it allows the USEPA to establish the NAAQS and directs states to develop state implementation plans to attain and maintain the NAAQS. CARB, in turn, delegates some of this authority to local air districts, such as ICAPCD. California Health and Safety Code (HSC) Section 39002 states that local and regional authorities have the primary responsibility for control of air pollution from all sources other than vehicular sources. This includes the responsibility for permitting, enforcement, collection of emission inventory data, and preparation of air quality plans. In line with its delegated authority, ICAPCD staff has developed internal policies, programs, and rules to reduce air pollution from sources within its jurisdiction. This section discusses the key programs and policies administered by the District that directly impact the air quality in the region and, by extension, the Corridor.

Incentive Programs

Carl Moyer Program

ICAPCD currently administers the Carl Moyer Program[39] within Imperial County. The purpose of the Carl Moyer Program is to obtain emission reductions of NO_X, PM_{10}, and reactive organic gases (ROG) from heavy-duty vehicles and other equipment operating in California as early and as cost-effectively as possible. The Carl Moyer Program provides financial incentives to assist in the purchase of cleaner-than-required engine and equipment technologies to achieve emission reductions that are real, quantifiable, and enforceable. ICAPCD makes grants available to qualified applicants. Eligible projects include purchasing cleaner on-road trucks, school and transit buses, off-road equipment, agricultural equipment, and lawn mowers. The Carl Moyer Program has been implemented in ICAPCD for the past 15 years. Most recently, the program has been funding the replacement of agricultural equipment, including tractors and hay loaders at a rate of 4 to 6 pieces of equipment per year.

Table 3.14 presents the 2017 and 2018 emission reductions resulting from this program.

Table 3.14. Imperial County Emission Reductions from Carl Moyer Program Projects

	NO_X (tpy)	ROG (tpy)	PM (tpy)
2017	19.78	2.41	0.91
2018	17.69	1.78	1.07

Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program

ICAPCD currently administers the FARMER Program[40] within Imperial County. The FARMER program provides funding through local air districts for agricultural harvesting equipment, heavy-duty trucks, agricultural pump engines, tractors, and other equipment used in agricultural operations, including zero-emission agricultural utility task vehicles. The purpose of the program is to reduce agricultural sector emissions by providing grants, rebates, and other financial incentives to replace agricultural operation equipment with cleaner alternatives. The program began in 2017 and provided ICAPCD an initial funding allocation of approximately $1.2 million. ICAPCD has received additional funding of approximately $1.1 million for 2019. Under the currently awarded amounts, ICAPCD estimates that 11 to 13 agricultural trucks and tractors will be replaced through the program each year. The District is currently working on six active projects.

Table 3.15 presents the estimated emission reductions expected from the first six projects.

[39] More information available at: https://www.co.imperial.ca.us/AirPollution/index.asp?fileinc=plancarl. Accessed: August 2019.
[40] More information available at: https://ww2.arb.ca.gov/our-work/programs/farmer-program. Accessed: August 2019.

Table 3.15. Imperial County Estimated Emission Reductions from current FARMER Program Projects

Project Type	NOx (tpy)	ROG (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)
On-Road Heavy-Duty AG Truck (New)	0.2177	0.0147	0.0074	0.0068
On-Road Heavy-Duty AG Truck (New)	0.1019	0.0057	0.0031	0.0028
On-Road Heavy-Duty AG Truck (New)	0.1692	0.0112	0.0054	0.005
On-Road Heavy-Duty AG Truck (New)	0.0334	0.0019	0.0019	0.0018
Off-Road Agricultural Equipment (Tractor, New)	0.6835	0.0419	0.0207	0.019
Off-Road Agricultural Equipment (Tractor, New)	0.9733	0.0496	0.0254	0.0234
TOTAL	**2.179**	**0.125**	**0.0639**	**0.0588**

Lawn Equipment Exchange Program

ICAPCD has been administering the Lawn Equipment Exchange Program for the past 4 years. The program reduces air pollution by allowing residents to exchange working gasoline-powered lawn mowers and lawn equipment with zero-emission electric-powered units at a discounted price. Since inception, ICAPCD has exchanged more than 237 lawn mowers, and 140 leaf blowers and trimmers. This has resulted in average emission reductions of 101 pounds of hydrocarbons and 830 pounds of carbon dioxide.[41]

State Reserve Funding

The 2018 State Reserve Project Solicitation[42] is directed at providing monetary grants to offset the incremental cost of off-road reduced emission technologies. Under the 2017 guidelines, mobile, portable, and stationary off-road compression ignition and large spark-ignition projects such as construction, agricultural, and industrial equipment are eligible for funding. ICAPCD recently used these funds to replace commercial-sized lawn mowers at Southwest High School and Central Union High School, both located within the Corridor.

Table 3.16 presents the emission reductions resulting from this program.

Table 3.16. Imperial County Emission Reductions from State Reserve Funding

	NOx	ROG	PM
Emission Reductions (tons/yr)	0.02	0.02	0.08

[41] More information available at: https://imperial.granicus.com/MetaViewer.php?view_id=2&clip_id=1470&meta_id=231617. Accessed: August 2019.

[42] More information available at: https://www.arb.ca.gov/msprog/moyer/statereserve.htm. Accessed: August 2019.

NOx Remediation Measures

CARB's Low Carbon Fuel Standard (LCFS) was originally adopted in 2009 and targets reductions in greenhouse gases through reduction of the carbon intensity of transportation fuels in California. In implementing the LCFS, CARB identified that the use of biomass-based diesel fuel may have resulted in increased NOx emissions. CARB committed to remediate potential increases in NOx emissions through a Voluntary NOx Remediation Measure (NRM) grant program. The ICAPCD was awarded a grant under this program to fund clean vehicle and equipment projects for immediate emission reductions in disadvantaged and low-income communities. The mission of the NRM grant, is to promote and protect public health and welfare through the effective and efficient reduction of air pollutants and the NRM must achieve NOx emission reductions that are permanent, surplus, and quantifiable. ICAPCD is using the funds provided by this grant to replace a school bus in Heber.

Table 3.17 presents the emission reductions resulting from this program.

Table 3.17. Imperial County Emission Reductions from NOx Remediation Measures

	NOx	ROG	PM
Emission Reductions (tons/yr)	0.57	0.01	0.23

Proposition 1B – Goods Movement Emission Reduction Program (GMERP)

Proposition 1B, GMERP, is a partnership between CARB and local agencies, including air districts and seaports to reduce air pollution emissions and health risks from diesel exhaust that are created by freight movement along California's trade corridors. Imperial County is within the San Diego/Border Trade Corridor.[43] Currently San Diego Air Pollution Control District is administering the program on behalf of the District.[44] This program has been in effect in ICAPCD for four funding cycles, starting in 2010. Table 3.18 presents the number of trucks that have been replaced or retrofitted under this program, along with resulting emission reductions. Note that these are mobile emissions, and as such emission reductions may not occur entirely in Imperial County.

[43] More information available at: https://www.arb.ca.gov/bonds/gmbond/gmbond.htm. Accessed: August 2019.
[44] More information available at: https://www.sdapcd.org/content/sdc/apcd/en/grants-and-incentives/proposition-1b-goods-movement-emission-reduction-program--gmerp-.html. Accessed: August 2019.

Table 3.18. Imperial County Emission Reductions from GMERP

	Trucks replaced	Trucks retrofitted	Emission Reductions (tons)[a]	
			PM_{10}	NOx
Year 1 Funds	51	0	11.5	214.6
Year 2 & 3 Funds	147	24	32.9	780.7
Year 4 Funds	106	0	4.1	512.9
TOTAL	**304**	**24**	**48.5**	**1,508.2**

Notes:

[a] Emission reduction estimates are based on a five-year project lifespan.

Additional Incentive Programs

The following incentive programs have been considered by the District or implemented in the past, but are not being currently implemented:

- Lower-Emission School Bus Program. This CARB program provides grant funding for new lower-emission school buses, as well as retrofit equipment for school buses. The program was administered by ICAPCD in 2008 and 2009, during which time the District retrofitted 54 and replaced 13 school buses in the County. The District is currently considering options for using this program in the future.[45]

- Woodsmoke Reduction Program. The Woodsmoke Reduction Program is administered by CARB and offers financial incentives for homeowners to replace wood stoves, wood inserts, or fireplaces with cleaner burning, more energy efficient devices.[46] ICAPCD has not yet participated in this program, but anticipates doing so in the future.

Non-Incentive Programs

Smoke Management Program

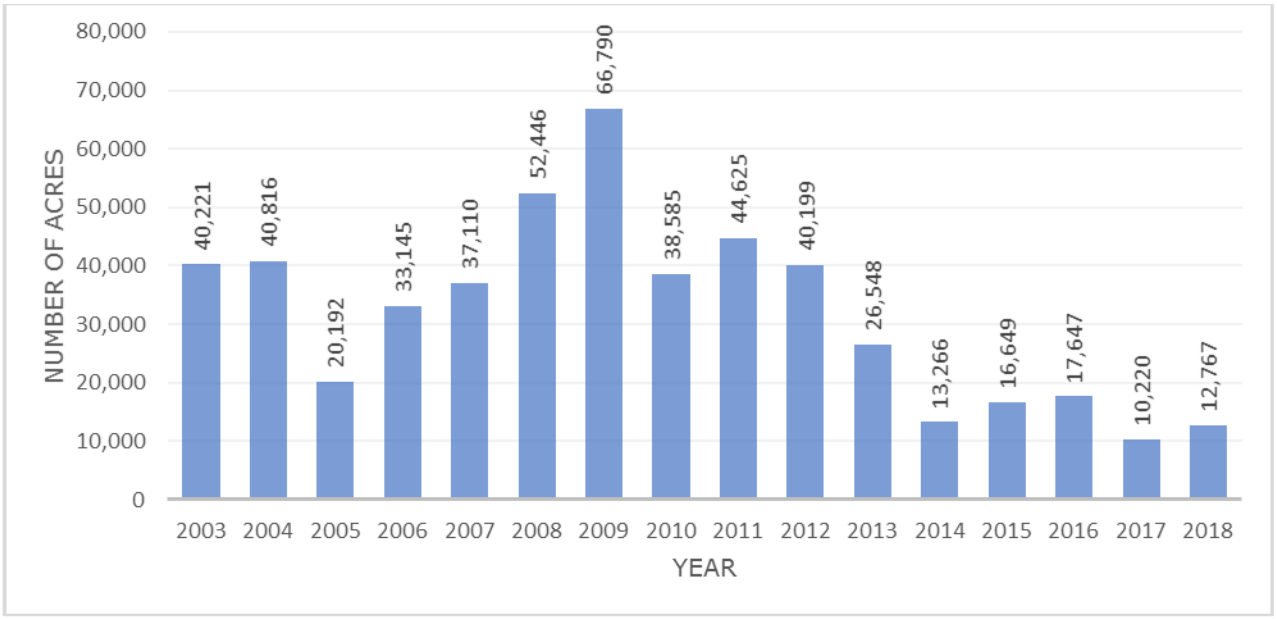
California HSC Section 41850 authorizes local air districts to reasonably regulate, but not prohibit agricultural burning. Furthermore, California HSC Section 41856 required CARB to develop guidelines for the regulation and control of agricultural burning for each air basin in the state. Title 17 of the California Code of Regulations ("Title 17") was developed to provide smoke management guidelines for agricultural and prescribed burning. Under Title 17, ICAPCD developed a Smoke Management Program (SMP), which addresses the relevant agricultural burning regulations, as well as applicable ICAPCD policies.[47] The objective of the SMP is to employ smoke management techniques on all agricultural burning projects to prevent smoke

[45] More information available at: https://www.arb.ca.gov/msprog/schoolbus/schoolbus.htm. Accessed: August 2019.
[46] More information available at: https://www.arb.ca.gov/planning/sip/woodsmoke/reduction_program.htm. Accessed: August 2019.
[47] More information available at: https://www.arb.ca.gov/smp/district/imp2010.pdf. Accessed: August 2019

impacts to communities and sensitive receptors in Imperial County. The SMP identifies ICAPCD smoke management and forecasting resources, and procedures for burn registration, smoke management planning, and obtaining burn permits. It also provides guidelines for consideration of smoke sensitive areas and alternatives/incentives for not burning.

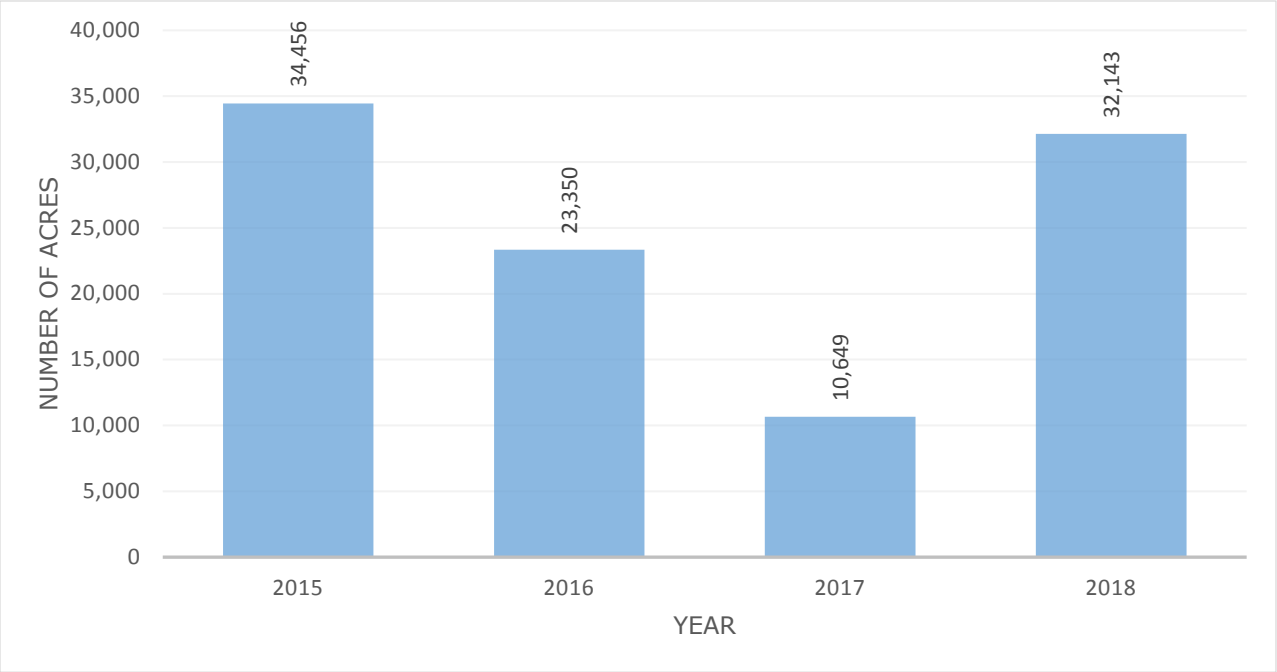
ICAPCD submits an annual burn report to CARB, in compliance with Title 17 Section 80130. The report includes the amount and type of crops burned during the previous calendar year. These reports indicate that there have been significant reductions in burning since 2003 in Imperial County. In fact, ICAPCD has reduced burning from 40,221 acres in 2003 to 12,767 acres in 2018, representing a 68 percent reduction in total acres burned.[48] Part of this success can be attributed to farmers utilizing the Agricultural Burning Emission Reduction Credit (ABERC) program instead of burning fields. As shown in Figures 3.17 and 3.18, since 2015, the number of acres participating in the ABERC program has been larger than the number of acres burned.

Figure 3.17. Agricultural Acres Burned in Imperial County, 2003-2018



[48] Agricultural Acres Burned in Imperial County 2003-2018: https://www.co.imperial.ca.us/AirPollution/index.asp. Accessed: August 2019.

Figure 3.18. Agricultural Acres Not Burned in Imperial County and Participating in ABERC Program, 2014-2018



Emission Reduction Credit (ERC) Program

An ERC is a credit earned by an entity when it reduces its emissions beyond what is required by regulation. That credit is an asset that can be used by the creating entity or sold to other entities that need to offset their emissions. The ICAPCD ERC Program is implemented through the following rules:

- *Rule 214, Emission Reduction Credit Banking*. This rule defines standards and practices to ensure that ERCs are real, permanent, quantifiable, enforceable, and surplus. It ensures that emission reductions are transferred through the District ERC bank for use as offsets that meet the requirements of New Source Review.
- *Rule 214.1, Mobile Source Emission Reduction Credit Banking*. Rule 214.1 establishes a procedure by which businesses and industries may create and use emission reduction credits. These credits may be used as stationary source offsets where allowed by rules and regulations, or may replace other emission reduction requirements. Eligible emission reduction strategies include an accelerated vehicle retirement program, and retrofitting of passenger cars, and light-, medium-, and heavy-duty vehicles.
- *Rule 214.2, Paving Unpaved Public Roads Emission Reduction Credits*. This rule provides a procedure for quantifying and certifying emission reductions for voluntary paving of unpaved public roads, and issuance of Paving Emission Reduction Credit (PERC) certificates. These PERC certificates may be issued to meet New Source Review offset requirements.

- *Rule 214.3, Agricultural Burning Emission Reduction Credit Bank*. This rule ensures that agricultural burning emission reductions are transferred through the ABERC bank. These credits may be used as permit offsets or for variance offset requirements. As shown in Figures 3.17 and 3.18 above, since 2015, the number of acres participating in the ABERC program has been larger than the number of acres burned. ABERCs are reduced in value over time, such that by the end of the fifth year after the ABERCs are generated, any unused amount will be zero.

The number of ABERCs generated from 2016 through 2018 is presented in Table 3.19.

Table 3.19. Imperial County Agricultural Burning Emission Reduction Credits Generated

	2016	2017	2018
PM_{10}	89.57	79.84	170.55
CO	804.20	713.04	1364.62
TOC	61.85	55.11	116.16
NOx	29.74	26.46	52.14

Rule 310, Operational Development Fee

The purpose of ICAPCD's *Rule 310, Operational Development Fee*, is to provide ICAPCD with a mechanism for mitigating emissions produced from the operation of new commercial and residential development projects. Project proponents may choose from three options: payment of a pre-determined project mitigation fee, development of an Alternative Emission Reduction Plan ("AER Plan") that reduces emissions associated with operation (which reduces fees based on partial or full mitigation of emissions as demonstrated by the AER Plan), or request project-specific operational emission analysis to reduce the mitigation fees. The funds generated by the Operational Development Fees are distributed by ICAPCD for various mitigation projects.

There have been seven projects completed under this program. Four additional projects are currently in progress. Table 3.20 presents the emission reductions resulting from this program.

Table 3.20. Imperial County Emission Reductions from Rule 310 Projects

	Ozone (tpy)	PM (tpy)
Completed Projects	15.26	6.11
Projects in Progress	1.14	4.24

Policies

The District has an internal policy manual with a variety of policies that are mostly administrative in nature. However, some policies are centered on specific source types and serve to enhance existing District rules. These policies include:

- *Policy #8, Designation of Restricted and Prohibited Burning Areas*. This policy prohibits field burning and other large burns for areas within any city or townsite.
- *Policy #15, Burning of Residential Rubbish Restricted*. This policy ensures that residential rubbish burning is regulated similar to that of permitted burning, in compliance with existing District regulations, so that it will not constitute a nuisance.
- *Policy #34, Agricultural Burning Procedures for Allocating Acreage, Burn Day Decisions, and Tracking*. This policy ensures that burn acreage is limited and that meteorological conditions are reviewed before allowing permitted burns.
- *Policy #38, Large Confined Animal Facilities Permits Required*. This policy requires Beef Feedlots and Dairies which meet the criteria for a Large Confined Animal Facility to develop an emission mitigation plan containing a number of measures as appropriate to each source category.

3.2.4.2 State Policies and Programs

Overview of California Air Resources Board's Statewide Actions

Community-scale air pollution exposure is caused by many factors, including the cumulative impacts from multiple pollution sources. Effective solutions require multiple strategies at both the statewide and local level to deliver new emissions reductions directly within these communities.

CARB has adopted a number of comprehensive air quality and climate plans over the last several years that lay out new emissions reduction strategies. These plans include the State Strategy for the State Implementation Plan,[49] the California Sustainable Freight Action Plan,[50] California's 2017 Climate Change Scoping Plan,[51] and the Short-Lived Climate Pollutants Reduction Strategy,[52] along with a suite of incentive programs. The CAPP Blueprint[53] further identified additional actions to reduce the air pollution burden in heavily impacted communities throughout the State. Together, these plans provide a foundation for the new actions identified as part of this Emission Reduction Plan.

This section illustrates CARB's statewide role in the Emission Reduction Plan, by broadly describing the regulatory, enforcement, and incentive-based actions CARB has taken to reduce

[49] CARB. 2017. *Revised Proposed 2016 State Strategy for the State Implementation Plan*. March 7. Available at: www.arb.ca.gov/planning/sip/sip.htm. Accessed: August 2019.
[50] California Department of Transportation. 2016. *California Sustainable Freight Action Plan*. July. Available at: http://www.dot.ca.gov/hq/tpp/offices/ogm/cs_freight_action_plan/theplan.html. Accessed: August 2019.
[51] CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November. Available at: www.arb.ca.gov/cc/scopingplan/scopingplan.htm. August 2019.
[52] CARB. 2017. *Short-Lived Climate Pollutant Reduction Strategy*. March. Available at: www.arb.ca.gov/cc/shortlived/shortlived.htm. Accessed: August 2019.
[53] CARB. 2018. *Final Community Air Protection Blueprint for Selecting Communities, Preparing Community Emissions Reduction Programs, Identifying Statewide Strategies, and Conducting Community Air Monitoring.* October. Available at: https://ww2.arb.ca.gov/our-work/programs/Community-Air-Protection-Program. Accessed: August 2019.

emissions statewide. It also highlights specific foundational CARB actions that address areas of concern identified by the El Centro-Heber-Calexico Community.

Regulatory Programs

Federal, State, and local air quality agencies all work together to reduce emissions. At the federal level, the USEPA has primary authority to control emissions from certain mobile sources, including sources that are all or partly under federal jurisdiction (e.g., some farm and construction equipment, aircraft, marine vessels, locomotives), which it shares in some cases with air districts and CARB. The USEPA also establishes ambient air quality standards for some air pollutants.

At the State level, CARB is responsible for controlling emissions from mobile sources and consumer products (except where federal law preempts CARB's authority), controlling toxic emissions from mobile and stationary sources, controlling greenhouse gases from mobile and stationary sources, developing fuel specifications, and coordinating State-level air quality planning strategies with other agencies.

Regionally, air districts are primarily responsible for controlling emissions from stationary and indirect sources (with the exception of consumer products in most cases) through rules and permitting programs within their regions.

CARB regulatory programs are designed to reduce emissions to protect public health, achieve air quality standards, reduce greenhouse gas emissions, and reduce exposure to toxic air contaminants. CARB establishes regulatory requirements for cleaner technologies (both zero and near-zero emissions) and their deployment into the fleet, for cleaner fuels, and to ensure in-use performance. CARB's regulatory programs are broad – impacting stationary sources, mobile sources, and multiple points within product supply chains from manufacturers to distributors, retailers, and end-users. CARB's regulations affect cars, trucks, ships, off-road equipment, consumer products, fuels, and stationary sources.

One important and relevant regulatory authority of CARB's is to adopt measures to reduce emissions of toxic air contaminants from mobile and non-mobile sources, known as Airborne Toxic Control Measures (ATCM).[54] These regulatory measures include process requirements, emissions limits, or technology requirements. Additionally, CARB implements the Statewide Air Toxics "Hot Spots" Program[55] to address the health risk from toxic air contaminants at individual facilities across the State. The Air Toxics "Hot Spots" Program includes several components to collect emissions data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels.

Under the Air Toxics "Hot Spots" Program, air districts are required to set a threshold for facilities that pose a significant health risk and prioritize facilities for health risk assessments. Air districts also establish a risk value above which facilities must conduct a risk reduction audit and emissions

[54] California Health and Safety Code § 39650 et seq.
[55] Assembly Bill 2588, Air Toxics "Hot Spots" Information and Assessment Act, Connelly, Statutes of 1987, California Health and Safety Code § 44300 et seq.

reduction plan. Facilities must develop these health risk assessments, risk reduction audits, and emission reduction plans. CARB provides technical guidance to support smaller businesses conducting health risk assessments and developing emissions reduction plans.

Additionally, CARB has pursued enforceable agreements with industry that result in voluntary but enforceable adoption of the cleanest technologies or practices and provide assurance that emissions reductions will be realized. CARB's agreement with the Union Pacific Railroad Company and BNSF Railway Company to accelerate introduction of cleaner locomotives in the South Coast Air Basin is an example of an enforceable agreement.

For more information on CARB's Air Toxics "Hot Spots" Program, visit: https://www.arb.ca.gov/ab2588/ab2588.htm. For more detailed information on CARB's statewide emissions reduction strategies, see Appendix C of the CAPP Blueprint at: https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program.

Enforcement Programs

To achieve the reductions associated with rules and regulations, regulated entities must comply with requirements and technology must function as expected. CARB's goal, set out in more detail in statute and in its Enforcement Policy, is to achieve comprehensive compliance with every regulation the CARB Governing Board has adopted, and the Enforcement Program finds violations, investigates cases, and resolves cases through either the administrative settlement process, or litigation. CARB's enforcement efforts encompass a broad spectrum of programs, including certification requirements for vehicles, engines, aftermarket parts, consumer products, and fuels; in-use fleet requirements focused on diesel mobile sources; and greenhouse gas standards for stationary sources.

CARB settlement of enforcement cases can also fund Supplemental Environmental Projects, which are not otherwise required by law or regulation but benefit air quality by reducing emissions, reducing exposure to air pollution, or preventing future air quality violations.[56] Examples of Supplemental Environmental Projects include installation of air filtration systems in schools, increasing services to children with asthma, and school bus and diesel emissions reduction projects.

One critical and relevant enforcement program is CARB's continued effort to streamline the Truck and Bus Regulation enforcement process.[57] This work is closely linked to implementation of Senate Bill 1,[58] which ties truck registration in California to compliance with the Truck and Bus Regulation. Once fully implemented, CARB's Enforcement Program will identify potential violators through Department of Motor Vehicles' registrations, notify potential violators, give violators an opportunity to prove compliance, and finally place registration holds on all trucks that do not

[56] CARB. 2016. Supplemental Environmental Project (SEP) Policy. December 8. Available at: https://ww2.arb.ca.gov/sites/default/files/2019-05/SEP_Policy_1.pdf. Accessed: August 2019.
[57] For more information on the Truck and Bus Regulation, visit: http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.
[58] California Vehicle Code § 4000.15(a).

comply with the regulation. This process is expected to significantly improve the compliance rate with the Truck and Bus Regulation and improve air quality along trucking corridors in California.

For more detailed information on CARB's Enforcement Programs, visit: https://www.arb.ca.gov/enf/enf.htm.

Incentive Programs

CARB operates incentive programs that reduce the costs of developing, purchasing, or operating cleaner technologies. The programs help ensure cleaner cars, trucks, equipment, and facilities are operating in our neighborhoods by driving the development of new, cleaner technologies, and by accelerating their sale and adoption. Specifically, they accelerate the introduction of advanced technology vehicles and equipment, accelerate the turnover of older and higher emitting vehicles and equipment, and increase access to clean vehicles and transportation in disadvantaged communities and lower-income households.

Examples of CARB incentive programs include the Carl Moyer Memorial Air Quality Standards Attainment Program[59] (the Community Air Protection Incentives[60] are implemented by the air district through this program), Proposition 1B: Goods Movement Emission Reduction Program,[61] Funding Agricultural Replacement Measures for Emission Reductions (FARMER) Program,[62] and Low Carbon Transportation Investments and Air Quality Improvement Program (which includes the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project).[63] While CARB is responsible for program oversight, some of these programs are implemented as a partnership with local air districts.

For more information on air pollution incentives, grants, and credit programs, visit: https://www.arb.ca.gov/ba/fininfo.htm.

CARB Actions Related to the El Centro-Heber-Calexico Corridor

This section highlights CARB actions that specifically relate to the El Centro-Heber-Calexico Corridor. This list should not be interpreted as comprehensive or exhaustive, but rather illustrative of some of the major statewide strategies driving emissions reductions in conjunction with those

[59] For more information on the Carl Moyer Memorial Air Quality Standards Attainment Program, visit: https://www.arb.ca.gov/msprog/moyer/moyer.htm.
[60] For more information on the Community Air Protection Incentives, visit: https://www.arb.ca.gov/msprog/cap/capfunds.htm
[61] For more information on the Proposition 1B: Goods Movement Emission Reduction Program, visit: https://www.arb.ca.gov/bonds/gmbond/gmbond.htm.
[62] For more information on the Funding Agricultural Replacement Measures for Emission Reductions Program, visit: https://ww2.arb.ca.gov/our-work/programs/farmer-program.
[63] For more information on the Low Carbon Transportation Investments and Air Quality Improvement Program, visit: https://ww2.arb.ca.gov/our-work/programs/low-carbon-transportation-investments-and-air-quality-improvement-program.

local level strategies identified in this Emission Reduction Plan. The full list of CARB foundational strategies can be found in Appendix D and Appendix F of the CAPP Blueprint.[64]

Advanced Clean Trucks Regulation

CARB is working through a public process to develop and consider proposals for new approaches and strategies that may transition to zero emission technology those truck fleets that operate in urban centers, have stop and go driving cycles, and are centrally maintained and fueled. For more information on the proposed regulation, visit: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-truck.

Heavy-Duty Vehicle Inspection and Maintenance

When emissions control systems are not operating correctly, in-use emissions can increase. CARB's current inspection programs include the roadside Heavy-Duty Vehicle Inspection Program and the fleet Periodic Smoke Inspection Program. These regulations require heavy-duty vehicles operating in California to be inspected for excessive smoke and tampering. In July 2018, CARB approved amendments to Heavy-Duty Vehicle Inspection Program and the Periodic Smoke Inspection Program to reduce the smoke opacity limits to levels more appropriate for today's modern engine technology. CARB is now exploring the development of a more comprehensive heavy-duty inspection and maintenance program which would help ensure all vehicle emissions control systems are adequately maintained throughout the vehicles' operating lives. For more information on existing heavy-duty maintenance programs, visit: https://www.arb.ca.gov/enf/hdvip/hdvip.htm. For more information on the development of a comprehensive heavy-duty inspection and maintenance program, visit: https://ww2.arb.ca.gov/our-work/programs/heavy-duty-inspection-and-maintenance-program.

Cross-Agency Engagement and Integration of Pesticide Application Information

The Department of Pesticide Regulation and the Imperial County Agricultural Commissioner's Office participated in the Steering Committee process. CARB is also working directly with the Department of Pesticide Regulation to integrate pesticide information in the online Resource Center. For more information on the online Resource Center, visit: https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program.

Reducing Emissions from Dairy and Other Livestock

As part of the Short-Lived Climate Pollutant Reduction Strategy, CARB, several lead State agencies, and other stakeholders will encourage and support near-term actions by dairies to reduce manure methane emissions through financial incentives, collaboration to overcome barriers, development of policies to encourage renewable natural gas production where appropriate as a pollution control strategy, and other market support. Enteric fermentation from

[64] CARB. 2018. *Final Community Air Protection Blueprint for Selecting Communities, Preparing Community Emissions Reduction Programs, Identifying Statewide Strategies, and Conducting Community Air Monitoring*. October. Available at: https://ww2.arb.ca.gov/our-work/programs/Community-Air-Protection-Program. Accessed: August 2019.

all livestock is also responsible for methane emissions. CARB, along with other lead State agencies, will continue to support and monitor research and explore voluntary, incentive-based approaches to reduce enteric fermentation emissions from dairy and non-dairy livestock sectors until cost-effective and scientifically-proven methods to reducing these emissions are available and regulatory actions can be evaluated. For more information on the strategy, visit: https://www.arb.ca.gov/cc/shortlived/shortlived.htm.

3.2.5 Sensitive Receptors and Land Use Policy

Land use planning is essential for ensuring effective and efficient use of land resources. Land use policy regulates the types of land uses that can be established in certain areas and as a result, can aid in environmental conservation, reduce urban sprawl, and decrease the public's exposure to pollutants. The following sections identify the locations of sensitive receptors in the Corridor and provide an overview of the existing land use policies in Imperial County.

3.2.5.1 Identification of Sensitive Receptors

Sensitive receptors refer to those segments of the population most susceptible to impacts from air pollution emissions (e.g., children, the elderly, and people with pre-existing serious health problems affected by air quality).[65] Sensitive receptors include residential communities, public and private K-12 schools, public and private day care centers, convalescent homes and elderly residential facilities, hospitals and long-term care facilities, and parks and athletic facilities.

A search for non-residential sensitive receptors (such as daycare centers, schools, hospitals, and other care facilities) showed that there are at least 83 sensitive receptors within the Corridor (see Figure 3.19 and Appendix E). Non-residential sensitive receptor locations were identified based on searches of the following on-line public databases:

- California Community Care Licensing Division (https://secure.dss.ca.gov/CareFacilitySearch/DownloadData);
    - Residential Care Facilities for the Elderly
    - Child Care Centers
    - Adult Residential Facilities
- Homeland Infrastructure Foundation-Level Data (https://hifld-geoplatform.opendata.arcgis.com/search)
    - Private Schools
    - Public Schools

[65] CARB. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April. Accessed: https://www.arb.ca.gov/ch/handbook.pdf. Accessed: August 2019.

- Hospitals
- Child Care Facilities

To further validate the location of sensitive receptors, there was an exercise at the fourth Steering Committee meeting held on January 30, 2019 during which the Steering Committee members were asked to identify sources of concern and the location of sensitive receptors on maps of the Corridor (see Figure 3.20 for an example).

Figure 3.19. Sensitive Receptor Locations in the El Centro-Heber-Calexico Corridor

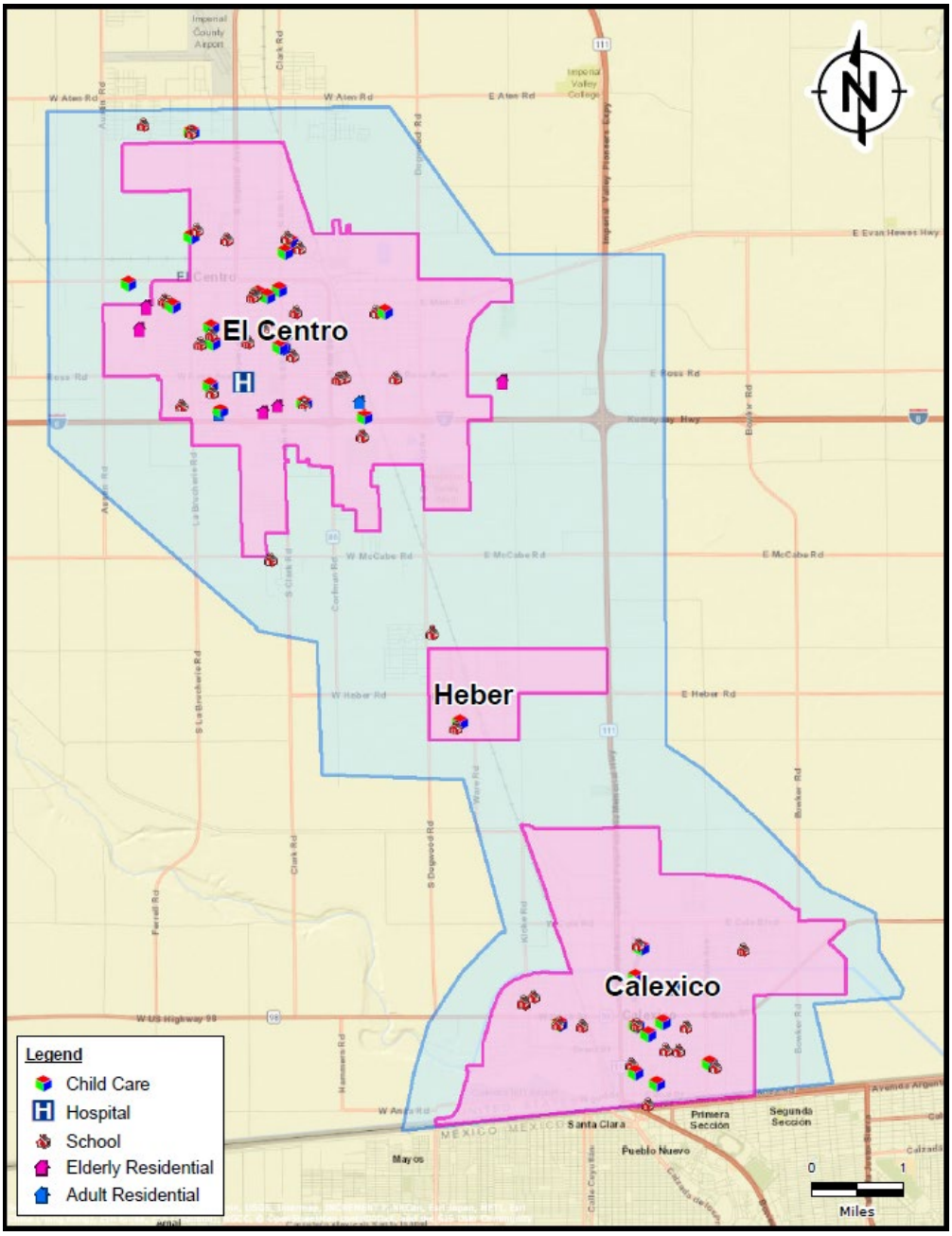
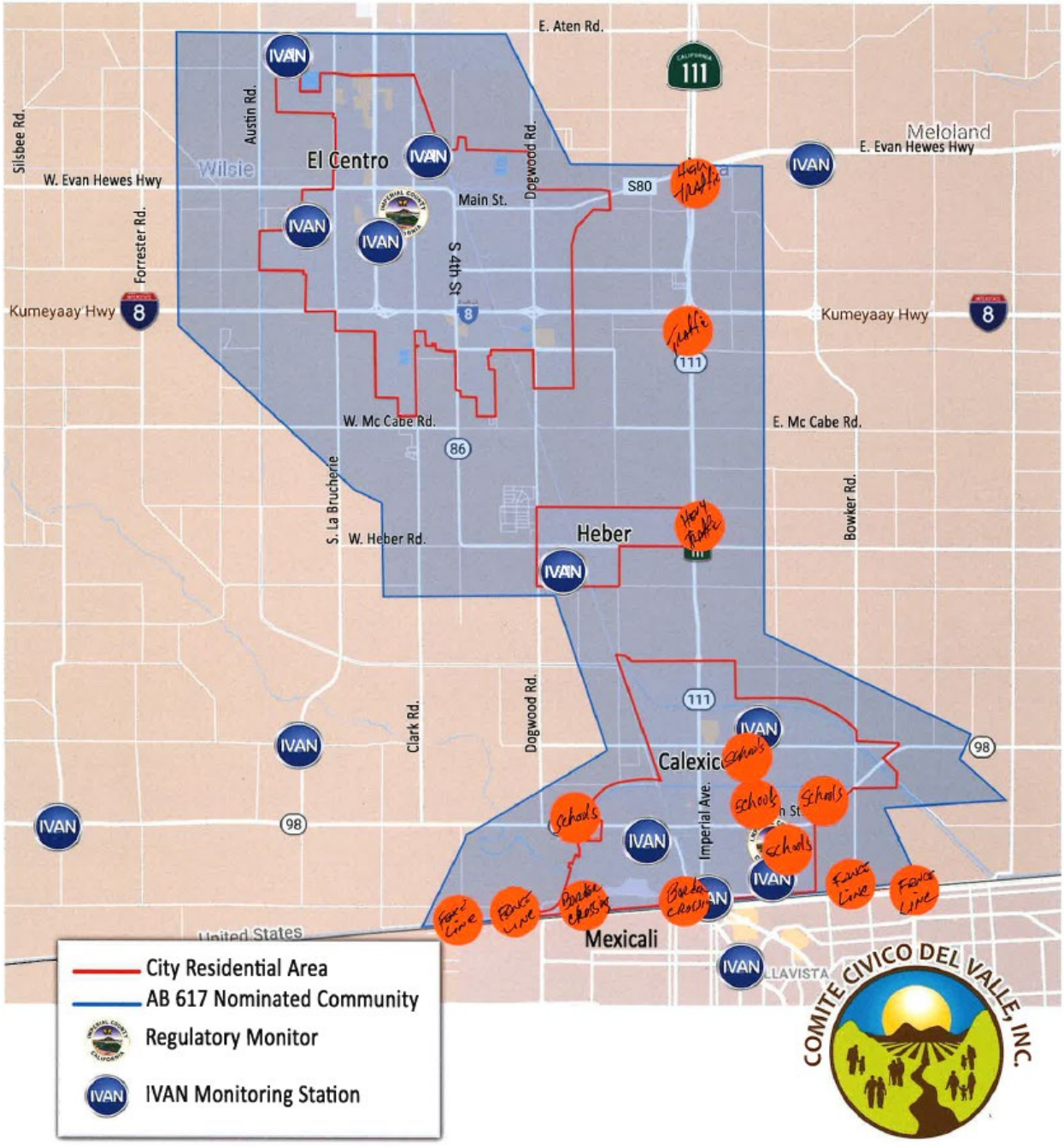


Figure 3.20. Locations of Emission Sources and Sensitive Receptors as Identified at a Steering Committee Meeting; Locations of Existing IVAN and Regulatory Monitors



3.2.5.2 Overview of Existing Land Use Policy

Land use policy in the Corridor is managed by several entities including Imperial County, City of El Centro, and the City of Calexico. Imperial County is responsible for the unincorporated areas

of the County while the City of El Centro and Calexico are responsible for the incorporated areas of their respective cities.

Imperial County Land Use Policy

Decisions regarding land use permit applications, zoning changes, general plan amendments, ordinance revisions, and the adoption of a revised general plan for unincorporated Imperial County are made by the Imperial County Board of Supervisors ("Board of Supervisors").[66] The Board of Supervisors is comprised of elected officials from each of the five supervisorial districts in the County. The Board of Supervisors oversees and/or consults with the following groups within the Planning and Development Services Department when making its decisions:

- **Planning Commission:** Reviews, revises, and implements the Imperial County General Plan ("General Plan").[67] Conducts studies and prepares plans as delegated by the Board of Supervisors.
- **Airport Land Use Commission:** Reviews and makes determinations for the use of land within an airport's "sphere of influence", assures safety of air navigations, promotes air commerce, and conducts public hearings regarding any proposed development within their responsibility.
- **Local Agency Formation Commission:** An independent agency responsible for the implementation of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. Responsible for oversight of boundary changes between the County, the cities, and special districts. The Heber Public Utility District (HPUD) is the only special district within the Corridor and provides limited public services such as water, wastewater, and parks and recreation services to the Heber community.
- **Environmental Evaluation Committee:** Evaluates all projects subject to the California Environmental Quality Act.
- **Building Board of Appeals:** Conducts hearings for appeals concerning the decision of the Building Official, Condemnation of Structures, and the Board of Supervisors in matters that deal with the Building Department and the Building Ordinance.

Ultimately, the Board of Supervisors is responsible for implementing and amending the Land Use Ordinance for the County.[68] The Land Use Ordinance provides comprehensive land use regulations for all unincorporated areas in Imperial County. The Land Use Ordinance also establishes the Planning & Development Department, which is tasked with managing land use development in the County. For instance, the Planning & Development Department (and associated Planning Commission) is responsible for developing the General Plan for the County,

[66] Imperial County. Board of Supervisors. Available at: http://www.icpds.com/?pid=4382. Accessed: August 2019.
[67] Imperial County. General Plan. Available at: http://www.icpds.com/?pid=571. Accessed: August 2019.
[68] Imperial County. Ordinances. Available at: http://www.icpds.com/?pid=573. Accessed: August 2019.

which serves as a policy guide for future development. The Land Use Element,[69] specifically, designates the general distribution, location, and extent standards for housing, business, industry, agriculture, open space, public facilities, and other land uses and is based on the following six concepts adopted by the Board of Supervisors:

1. Quality of life;
2. Safety for people and property;
3. Wide selection of social and economic opportunities;
4. Efficient use of natural, human, and financial resources;
5. Clean air, water, and land; and
6. Quiet, beautiful communities and rural areas.

The Land Use Element includes policies and programs that ensure appropriate land use development. These programs protect agricultural and industrial land uses from the encroachment of residential development, as well as protect residential land uses from environmental impacts of the former land uses. The Land Use Element strongly supports continued use of areas designated as agriculture and exclusion of incompatible residential uses in these areas. In addition, agricultural zones are preferred adjacent to industry. New residences, except for managers or caretakers, are prohibited in areas with industrial zoning. If residential areas are adjacent to industrial areas, the adjacent industrial area must be light industrial as a transition zone.

The Agricultural Element[70] includes policies and programs designed to protect the agricultural industry in Imperial County and ensure its continued prosperity. Adoption of the Agricultural Element has contributed to the continued success of this industry and outlines the ways in which the County is committed to the promotion, management, use, development, and protection of agricultural production. It serves to not only inform current and prospective developers of agricultural and non-agricultural lands, but also guide County staff goals, activities, and decisions regarding agricultural areas.

One particular goal of the Agricultural Element is to “Limit the introduction of conflicting uses into farming areas, including residential development of existing parcels which may create the potential for conflict with continued agricultural use of adjacent property”. The Element recognizes that certain provisions of the Imperial County Right-to-Farm Ordinance[71] can be enforced in support of this goal. In an effort to reduce the loss of agricultural resources within the County, this

[69] Imperial County 2015. Land Use Element of the Imperial County General Plan. Available at: http://www.icpds.com/CMS/Media/Land-Use-Element-(2015).pdf. Accessed: August 2019.
[70] Imperial County. 2015. Agricultural Element of the Imperial County General Plan. Available at: http://www.icpds.com/CMS/Media/Agricultural-Element-2015.pdf. Accessed: September 2019.
[71] Imperial County. Right to Farm Ordinance No. 1031. Available at: http://www.icpds.com/CMS/Media/M-Appendix-B---Right-to-Farm-Ordinance.pdf. Accessed: September 2019.

ordinance clarifies the circumstances under which agricultural operations may be considered a "nuisance". Essentially, it stipulates that no lawful agricultural activity conducted for commercial purposes shall be considered a nuisance if it was not a nuisance when it began. This ordinance serves to protect existing agricultural operations from the legal implications of being declared a nuisance by public or private entities electing to locate themselves nearby.

Guidelines for updating and/or amending the General Plan are included in the Land Use Ordinance. For this, applications must be submitted to the Planning & Development Department. The application is then reviewed by the Planning Commission, which recommends the approval of the proposed change or denies the application. The Board of Supervisors is tasked with providing final approval of General Plan amendments.

Heber Land Use Policy

The Imperial County General Plan designates the townsite of Heber and surrounding area bounded by Farnsworth Lane on the west, Correll Road on the north, Pitzer Road on the east, and Fawcett Road on the South as the Heber "Urban" Area. The Heber Urban Area development is further guided by the Heber Urban Area Plan.[72] Heber is expected to have substantial population growth as a result of new housing construction and expansion of sewer and water infrastructure. Therefore, many of the goals of the Heber Urban Area Plan center around ensuring that new development is allowed to thrive while mitigating impacts to schools and residential areas in Heber. Specifically, existing industrial land uses are allowed to expand, but will be monitored to ensure the land uses do not pose an environmental threat. Agricultural development is not compatible with the Heber Urban Area Plan. Existing agricultural land uses are allowed to be maintained and continued as long as it does not conflict with surrounding land uses and there is no expansion. Other measures included in the Heber Urban Area Plan include discouraging the development of non-compatible land uses near geothermal plants, prohibiting the burning of household trash in the planning area, and encouraging the paving of unpaved roadways within the townsite.

City of El Centro Land Use Policy

The City of El Centro Community Development Department manages land use policy for the incorporated area of El Centro, as well as unincorporated portions of Imperial County that are within the City's sphere of influence. The Community Development Department is supervised by the El Centro City Council and consists of three divisions:[73]

1. Code Enforcement Division: Performs inspections and keeps records in order to improve and preserve the City of El Centro.

[72] Imperial County. Heber Urban Area Plan. Available at: http://www.icpds.com/CMS/Media/Heber-Urban-Area-Plan.pdf. Accessed: August 2019.
[73] City of El Centro. Organizational Chart. Available at: http://www.cityofelcentro.org/userfiles/August%202014%20Org%20Chart%20All%20Depts.pdf. Accessed: August 2019.

2. Building & Safety: Provides building code enforcement for all construction projects in the City of El Centro.

3. Planning & Zoning: Ensures compliance with the policies as set forth in the Zoning Ordinance and General Plan.

The Land Use Element of the El Centro General Plan provides a guide to land use planning in the City of El Centro.[74] Guidelines for updating and/or amending the El Centro General Plan are included in the Municipal Ordinance.[75] The El Centro Municipal Ordinance also divides the city into residential, commercial, manufacturing, and special/other zones. Commercial and industrial land uses are prohibited in all residential zones.

City of Calexico Land Use Policy

The City of Calexico Development Services Department manages land use policy for the incorporated area of Calexico, as well as unincorporated portions of Imperial County that are within the City's sphere of influence. The Calexico Development Services Department is supervised by the Calexico City Council and consists of three divisions[76]:

1. Building Division: Conducts plan checks, issues building permits, and performs inspections. Enforces the building codes as adopted by the City.

2. Engineering Division: Oversees the City's community development. Is responsible for the orderly development of all public infrastructure in the City of Calexico, such as water and wastewater systems.

3. Planning Division: Reviews all development proposals. Processes all requests for annexations, re-zonings, and land use entitlements. Is responsible for long-range and advanced planning in the City. Makes recommendations to the Planning Commission and City Council concerning updates to the Calexico General Plan and other planning documents.

The City of Calexico has also established the Planning Commission to review applications and oversee public hearings related to land use development and planning. The Planning Commission makes recommendations to the City Council based on an application's consistency and compatibility with the Calexico General Plan.

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[74] City of El Centro. General Plan. Available at: http://www.cityofelcentro.org/communitydevelopment/plans-documents. Accessed: August 2019.
[75] City of El Centro. Municipal Ordinance. Available at: https://library.municode.com/ca/el_centro/codes/code_of_ordinances?nodeId=CHCOTA_CH29ZO. Accessed: August 2019.
[76] City of Calexico. Development Services. Available at: http://www.calexico.ca.gov/index.asp?SEC=ECF96EA2-AA20-424A-8AE2-8DFD45E85A8A&Type=B_BASIC. Accessed: August 2019.

The Land Use Element of the Calexico General Plan provides a guide to land use planning in the City of Calexico.[77] Guidelines for updating and/or amending the Calexico General Plan are included in the Calexico Municipal Code.[78] The Calexico Municipal Code divides the city into residential, commercial, industrial, and special purpose zones.

3.2.5.3 Identification of Existing and Potential Land Use Issues

The proximity of residential and sensitive land uses to industrial and agricultural land uses was identified as a concern in the *Imperial County AB 617 Community Nominations* report.[79] In addition, during the fourth Steering Committee meeting, attendees expressed concern about the proximity of Heber Elementary School to the nearby water treatment plant, geothermal plant, aggregate plant, feedlot, open areas, and general farming.

The proximity of sensitive land uses to industry is often the result of communities having expanded over time into properties which are adjacent to pre-existing industrial or agricultural land uses. The primary industries in the Corridor are commercial agriculture and various industrial facilities, around which the towns of El Centro, Calexico, and Heber were built. The land use plans in the Corridor tend to be supportive of the existing industry and discourage development of residential and sensitive land uses near the existing agriculture and industrial areas.

3.2.6 Assessment of Compliance

Under federal and state law, ICAPCD is under legal obligation to establish and enforce air quality regulations. These regulations are primarily meant to ensure that the area meets federal and state air quality standards. ICAPCD also has authority to regulate toxic and hazardous air emissions from stationary sources. These regulations are enforced in the same manner as those which pertain to ambient air quality standards.

ICAPCD is also responsible for issuing permits, monitoring permitted and unpermitted facilities for compliance, responding to air quality complaints, and performing inspections at permitted facilities. As of 2018, there are 212 ICAPCD permitted facilities operating in the El Centro-Heber-Calexico Corridor, with a total of 257 permitted units. Of these 212 permitted facilities, 43% include combustion sources, 16% are service stations, 8% are facilities operating paint booths, and 4% are geothermal facilities. The remaining 29% consist of beef feedlots, non-retail stationary sources, manufacturing, and other types of facilities. Permitting and enforcement statistics are detailed in Appendix F.

ICAPCD performs inspections at all permitted facilities in the El Centro-Heber-Calexico Corridor at least once per year. These inspections are intended to confirm that facilities are in compliance

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[77] City of Calexico. 2015 Draft General Plan Update. Available at: http://www.calexico.ca.gov/index.asp?SEC=254C9C81-D449-44C7-B581-0B8070E31FF1&Type=B_BASIC. Accessed: August 2019.

[78] City of Calexico. Municipal Code. Available at: https://library.municode.com/ca/calexico/codes/code_of_ordinances?nodeId=CITY_CALEXICOMUCO1995. Accessed: August 2019.

[79] Available at: https://ww2.arb.ca.gov/resources/documents/imperial-county-ab617-community-nominations-submitted-partnership-comite-civico. Accessed: August 2019.

with air district rules and permit conditions. A total of 157 notices of violation (NOVs) and notices to comply (NTCs) were issued from 2016 to 2018 in the El Centro-Heber-Calexico Corridor. Of those violations, approximately 67% were administrative in nature, including failure to submit annual reports, failure to apply for permits, and failure to submit fees. The remaining violations were related to dust and opacity (3%), open burns (1%), service station maintenance (10%), and other stationary source violations (19%). A non-compliance rate can be defined as:

$$\frac{Number\ of\ facilities\ receiving\ violations}{Total\ number\ of\ facilities}$$

Using this definition, the Corridor had an overall non-compliance rate between 14 and 22 percent from 2016 to 2018.

4 Targets and Strategies

The CAPP Blueprint requires communities to develop targets and strategies for obtaining the objectives of their emissions reduction programs. Emission reduction targets must be specific and quantifiable in order to track progress overtime. Furthermore, emission reduction targets must focus and accelerate actions to provide direct emissions reductions within the community to maximize reductions in exposure to TACs and to achieve healthful levels of $PM_{2.5.}$ Once emission reduction targets are established, strategies can be developed for achieving the targets. The strategies can include regulatory strategies, facility risk reduction audits, air quality permitting, enforcement strategies, incentive program strategies, and land use, transportation, and mitigation strategies. The emission reduction targets and strategies for the Corridor were developed based on information compiled from the Technical Assessment (Chapter 3) and in consideration of input provided by the Steering Committee. Specific details regarding this Plan's targets and strategies are provided in the following sections.

4.1 Emission Reduction Targets

Emission reduction targets must be specific, quantifiable, measurable, and achievable within five years. The CAPP Blueprint provides a process for developing targets that meet the required criteria. This process includes the following steps:

1. Establish specific, numerical goals for compliance and deployment of technology and control techniques.
2. Calculate the emissions reductions associated with these goals to establish emission reduction targets.

Of the 28 strategies presented in the following sections, 5 strategies are expected to result in quantifiable reductions in emissions. These reductions are summarized in Table 4.1 below and formulate the emission reduction targets of this Plan. Additional strategies are also expected to result in emission reductions; however, due to their nature or the stage in their planning the amount of reductions to be achieved is unknown.

Table 4.1. Emission Reduction Targets

Strategy	Description	Estimated Emission Reductions 2020 (tons per year)					Estimated Emission Reductions [a] 2024 (tons per year)				
		$PM_{2.5}$	PM_{10}	DPM	NOx	VOC	$PM_{2.5}$	PM_{10}	DPM	NOx	VOC
R-2	CARB/State Strategies						0.20		0.20	13.48	8.35
I-1	Wood Burning Device Grant Program [b]	0.13			0.01	0.13	0.13			0.01	0.13
M-3	Parking Lot Paving Projects	[c]	[c]				[c]	[c]			
M-5	Strategic Updates to ICAPCD Policy #34	[d]					[d]				
M-6	School Bus Replacement Projects [e]		0.004	0.004	0.09	0.01		0.02	0.02	0.46	0.04
	TOTAL	**0.13**	**0.004**	**0.004**	**0.10**	**0.14**	**0.33**	**0.02**	**0.22**	**13.95**	**8.52**

Notes:

[a] Emission reductions for 2025-2029 are identical to the above for strategies I-1, M-3, M-5, and M-6. See Table 4.3 for Strategy R-2 emission reductions in 2025-2029.

[b] Emission reductions for Strategy I-1 assume three units are replaced in 2020.

[c] Emission reductions for Strategy M-3 are yet to be determined.

[d] Maximum emission reductions from Policy #34 updates are estimated at 6.6 tons/day $PM_{2.5}$, but are not guaranteed to occur in the Corridor. Actual emission reductions will also depend on the number of burn days each year, and the frequency of burning up to the maximum acres allowed under Policy #34.

[e] Emission reductions for Strategy M-6 assume a 1999 model year diesel bus is replaced with an electric bus at a rate of one per year starting in 2020, for a total of five buses replaced by 2024. DPM emission reductions for this strategy are assumed to be equal to the PM_{10} emission reductions.

4.2 Compliance Goals

In the development of this Plan, ICAPCD performed a three-year retrospective review of compliance in the Corridor (see Section 5.2.1). This assessment showed that a total of 157 NOVs and NTCs were issued from 2016 to 2018. These violations were predominantly administrative in nature, but also included violations related to dust and opacity, open burns, service station maintenance, and other stationary source violations. When considering the number of facilities receiving violations compared to the total number of facilities, the Corridor had an overall non-compliance rate between 14 and 22 percent from 2016 to 2018. In order to improve compliance within the Corridor, the District is proposing several enhanced enforcement strategies, as outlined in Section 4.4.4 and Section 5.3.1. While these strategies will likely improve compliance in the long term, it is unknown how directly the non-compliance rate will be tied to strategy implementation. For this reason, a compliance goal hasn't been established in this Plan. However, as noted in Chapter 6, the District will continue to track key compliance statistics, including the non-compliance rate.

4.3 Proximity-Based Goals

Exposure to TACs and $PM_{2.5}$ may still be an issue in certain locations even with the implementation of the cleanest possible technologies. Sensitive receptors, such as children, the elderly, and individuals with certain medical conditions, are more vulnerable than the rest of the population. Examples of proximity-based goals include installation of air filtration systems at schools, vegetative barriers, and new truck routes to avoid populated areas. In order to develop proximity-based goals, the Steering Committee identified sensitive receptor locations that are in close proximity to emissions sources and established measurable goals for implementing exposure reduction measures. A detailed discussion of sensitive receptor identification is provided in Section 3.2.5.1.

Of the 28 strategies presented in the following sections, 3 strategies are expected to directly reduce human exposure to pollutants. Table 4.2 below presents a summary of the proximity-based goals for this Plan.

Table 4.2. Proximity-Based Goals

Strategy	Description	Exposure-Related Goals 2020-2024
M-1	Air Filtration Systems	240,000 sq. ft. of building space
M-2	Urban Greening Projects	At least $200,000 in new projects
M-4	Expanded/Improved School Flag Program	As many schools as funding allows

4.4 Reduction Strategies

ICAPCD and the Steering Committee have identified strategies necessary to meet the emission reduction targets and associated goals. These strategies establish a path towards continuing long term reductions in $PM_{2.5}$ and TACs. The strategies have been informed by the technical assessment of the types of sources contributing to elevated pollution levels, as well as the relative benefits and feasibility. Identified reduction strategies include regulatory strategies, facility risk reduction audits, air quality permitting, enforcement strategies, incentive program strategies, and land use, transportation, and mitigation strategies. The identified strategies are separated into two categories:

- Tier 1 Strategies – Strategies with well-defined projects, where the project partners have been identified.
- Tier 2 Strategies – Strategies which require further study, planning, and stakeholder input prior to implementation.

Details on the identified strategies are in the following sections.

4.4.1 Regulatory Strategies

Types of regulatory strategies that were considered for inclusion in this Plan include an expedited schedule for Best Available Retrofit Control Technology (BARCT) implementation, identification of new district rules and regulations, and coordination with CARB to quantify the impact that proposed CARB regulatory measures/amendments could have on the Corridor.

In recent years, ICAPCD has performed a thorough review of its rulebook to identify potential ways to produce emissions reductions through new or modified rules that impose source control requirements or limitations on activities that generate emissions. Reviews of District rules were conducted during the writing of recent SIPs for the $PM_{2.5}$, PM_{10}, and Ozone NAAQS. Specifically, in the 2018 $PM_{2.5}$ SIP and the 2017 Ozone SIP, sources within the District were evaluated to determine if the ICAPCD rules regulating them were as stringent as required for the nonattainment status of those pollutants at the time. The requirement for these pollutants was to have sources controlled by Reasonably Available Control Measures (RACM) or Reasonably Available Control Technology (RACT) for stationary sources. For the 2018 $PM_{2.5}$ SIP, the RACM/RACT analysis revealed the need for improved controls on $PM_{2.5}$ emissions from wood burning fireplaces and heaters. Thus, the District proposed a new rule requiring new wood burning devices to comply with New Source Performance Standards (NSPS) certification requirements. The RACM/RACT assessment conducted for the 2017 Ozone SIP revealed that the existing controls on sources within the District were adequate for the requirements of a Moderate nonattainment area, and thus no new or modified rules were introduced.

For the 2018 PM_{10} SIP, District rules were evaluated against more stringent standards. Due to the area's Serious nonattainment status, sources were required to be controlled at a level of stringency equivalent to the Best Available Control Measures (BACM) or Best Available Control Technology (BACT) for stationary sources. The District performed a review of its rulebook and found that, after the Regulation VIII rules controlling sources of fugitive dust were updated as part of legal proceedings following the 2009 PM_{10} SIP, no other new or amended rules were required.

More recently, the District and CARB have been working with United States and Mexican agencies to develop the Imperial County-Mexicali Air Quality Work Plan.[80] This collaborative effort between governments on both sides of the border provides a plan for prioritizing actions that should be taken to improve air quality in the border region. Priorities of the plan include education and outreach, improved air monitoring, and strategies to reduce emissions from sources such as agricultural burning, vehicles at the border, and unpaved roads. The results of this plan may include new regulatory action taken by agencies, including CARB and ICAPCD. The plan's working draft will be reviewed on a regular basis to determine if and when new rules or regulations in Imperial County result from it.

Given the extensive review in the recent past of Imperial County air quality rules and the ongoing consideration for new control strategies as part of the Imperial County-Mexicali Air Quality Work Plan, the primary focus of this Community Emissions Reduction Plan and the actions taken by the District specifically as part of AB 617 will focus more on policy revisions. More detail on these policy revisions is provided in Section 4.4.4 (Enforcement Strategies) and Section 5.3.1 (Enhanced Enforcement Measures) of this Plan.

R-1 – Accelerated BARCT (Tier 1)

AB 617 amended California HSC Section 40920.6 to require that each air district that is a nonattainment area for one or more pollutants adopt an expedited schedule for implementation of BARCT on industrial sources that, as of January 1, 2017, were subject to the California Greenhouse Gas (GHG) Cap-and-Trade program. BARCT must be implemented by the earliest feasible date, but no later than December 31, 2023. Imperial County is a nonattainment area for O_3 and particulate matter (PM_{10} and $PM_{2.5}$) air quality standards and features two facilities that were subject to the Cap-and-Trade program as of January 1, 2017, Spreckels Sugar Company, Inc. (Brawley, California) and U.S. Gypsum Company (Plaster City, California). These facilities operate large industrial boilers (Spreckels Sugar) and wallboard kilns (U.S. Gypsum) which are subject to the expedited schedule for implementation of BARCT. Although these facilities reside outside of the Corridor, emission reductions resulting from BARCT implementation have the potential to affect ambient pollutant concentrations within the Corridor. ICAPCD is in the process of identifying one or more potential control options for this equipment, reviewing the cost effectiveness of each potential control option, and calculating the incremental cost-effectiveness of each potential control option. This process will be completed and information will be reviewed at a public meeting during calendar year 2019.

R-2 - CARB/State Strategies (Tier 1)

ICAPCD coordinated with CARB to identify state regulatory amendments that, while not directly targeting Imperial County, would result in benefits to the Corridor when adopted. There are currently at least five proposed statewide measures that would result in emissions benefits within the Corridor:

[80] CARB. 2018. Imperial County-Mexicali Air Quality Work Plan to Improve Air Quality in the Border Region (Working Group Draft). Available at: https://ww3.arb.ca.gov/planning/border/workplan.pdf. Accessed: August 2019.

- Advanced Clean Car 2 – CARB would consider expanded California-specific standards for new light-duty vehicles, impacting 2026 and later model year vehicles, to increase the number of new zero emission and plug-in hybrid electric vehicles sold in California and increase the stringency of fleet-wide emission standards for greenhouse gases and criteria pollutants.
- Advanced Clean Truck – CARB is working through a public process to develop and consider proposals for new approaches and strategies that may transition to zero emission technology those truck fleets that operate in urban centers, have stop and go driving cycles, and are centrally maintained and fueled.[81]
- Heavy-Duty Inspection and Maintenance – When emissions control systems are not operating correctly, in-use emissions can increase. CARB's current inspection programs include the roadside Heavy-Duty Vehicle Inspection Program[82] and the fleet Periodic Smoke Inspection Program.[83] These regulations require heavy-duty vehicles operating in California to be inspected for excessive smoke and tampering. In July 2018, CARB approved amendments to the Heavy-Duty Vehicle Inspection Program and the Periodic Smoke Inspection Program to reduce the smoke opacity limits to levels more appropriate for today's modern engine technology. CARB is now exploring the development of a more comprehensive heavy-duty inspection and maintenance program which would help ensure all vehicle emissions control systems are adequately maintained throughout the vehicles' operating lives.[84]
- Low NOx Engine Standard – This measure would establish lower NO_X standards and associated test procedures for model year 2022 and subsequent model year medium-duty and heavy-duty engines. CARB is in the process of evaluating the technical feasibility of this measure.[85]
- Small Off-Road Engine Amendment – In 2020, CARB will consider new standards for small off-road engines (SORE), which are spark-ignition engines rated at or below 19 kilowatts and used primarily for lawn, garden, and other outdoor power equipment.[86]

If adopted, these measures would result in emission reductions of $PM_{2.5}$, DPM, NO_X, and VOCs (see Table 4.3 below). These reductions would apply to both the on-road mobile source and off-road mobile source community-level emission inventory categories (see Sections 3.2.2.3 and 3.2.2.4).

[81] CARB Advanced Clean Trucks. Available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks. Accessed: August 2019.
[82] CARB Heavy Duty Vehicle Inspection and Maintenance Program. Available at: https://ww2.arb.ca.gov/our-work/programs/heavy-duty-inspection-and-maintenance-program. Accessed: August 2019.
[83] CARB Smoke Inspection Programs. Available at: https://ww2.arb.ca.gov/our-work/programs/smoke-inspection-programs. Accessed: August 2019.
[84] CARB Heavy-Duty Vehicle Enforcement. Available at: https://ww3.arb.ca.gov/enf/hdvip/hdvip.htm. Accessed: August 2019.
[85] CARB. 2019. Staff Assessment of the Technical Feasibility of Lower NOx Standards and Associated Test Procedures for 2022 and Subsequent Model Year Medium-Duty and Heavy-Duty Diesel Engines. April 18. Available at: https://ww3.arb.ca.gov/msprog/hdlownox/white_paper_04182019a.pdf. Accessed: August 2019.
[86] CARB Small Off-Road Engines (SORE). Available at: https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore. Accessed: August 2019.

Table 4.3. Estimated Emission Reductions Associated with CARB/State Strategies

Proposed Statewide Measure	Emission Reductions (tons per year)							
	$PM_{2.5}$		DPM		NO_X		VOC	
	2024	2029	2024	2029	2024	2029	2024	2029
Advanced Clean Car 2		0.008		0.0002		0.487		0.23
Advanced Clean Truck	0.001	0.03	0.0001	0.004	0.03	0.63		
Heavy-Duty Inspection and Maintenance	0.20	0.25	0.20	0.25	10.60	12.52		
Low NO_X Engine Standard					2.05	19.87		
Small Off-Road Engine Amendment					0.80	1.89	8.35	13.93
TOTAL	**0.20**	**0.28**	**0.20**	**0.25**	**13.48**	**35.40**	**8.35**	**14.17**

Notes:
Totals may not add up due to rounding.

ICAPCD will continue to coordinate with CARB to identify state regulatory amendments that could result in benefits to the Corridor. Each new regulatory amendment will be reviewed for public health and clean air benefits, cost-effectiveness, and air quality and attainment benefits.

4.4.2 Facility Risk Reduction Audits

AB 617 requires air districts to perform an assessment of its Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) facilities to determine which have risk reduction audits and emission reduction plans that could be reviewed and updated. Specifically, AB 617 authorizes air districts to reopen existing plans in order to strengthen them. AB 2588, enacted in 1987, requires stationary sources to report the types and quantities of certain hazardous materials released into the air.[87] Reportable emissions include continuous releases, intermittent releases, and those resulting from process upsets or leaks. The purpose of AB 2588 is to collect emissions data in order to identify facilities that have localized impacts or an elevated risk of adverse health effects. California HSC Section 44360(a) requires air districts to prioritize facilities based on the submitted emission inventories, and place them in one of three categories: high, intermediate, and low priority. In categorizing a facility, air districts are required to consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors determined to pose a significant risk. Facilities designated as high priority must submit Health Risk Assessments to assess the risk to the surrounding community. Owners of facilities found to pose significant risks must prepare and

[87] CARB. Overview of the Air Toxics "Hot Spots" Information and Assessment Act. Available at: https://www.arb.ca.gov/ab2588/overview.htm. Accessed: August 2019

implement risk reduction audits and plans within six months of designation. Facilities designated as intermediate priority are required to submit a complete toxics inventory once every four years. Low priority facilities are exempt from reporting.

Table 4.4 below lists the facilities within and directly surrounding the Corridor that are subject to AB 2588:

Table 4.4. AB 2588 Facilities within or directly surrounding the El Centro-Heber-Calexico Corridor

Facility ID	Facility Name	Facility Designation
2	SUPERIOR READY MIX/RYERSON	Low
15	IMPERIAL IRRIGATION DISTRICT ECGS	Low
19	RYERSON CONCRETE CO	Low
24	GRANITE CONSTRUCTION COMPANY	Low
39	SFPP, L.P. IMPERIAL TERMINAL	Low
42	WILBUR ELLIS CO	Low
43	ORMAT NEVADA, INC	Low
78	EIGHT STAR COMMODITIES	Low

All of the above facilities are designated as low priority, which means that the owners/operators are not required to perform risk reduction audits or submit emission reduction plans. As a result, this emission reduction strategy is not applicable to the El Centro-Heber-Calexico Corridor.

4.4.3 Air Quality Permitting

Strategies involving air quality permits can be an effective way to create new emissions reductions by requiring a defined level of stringency in emissions controls in order for a business to be granted a permit to operate.

A-1 – Technology Clearinghouse (Tier 1)

While permits are already required for most industrial operations in Imperial County, making updates to the way the District grants permits and introducing new requirements on control technologies needed to gain a specific type of permit can further control pollutant emissions. Under this strategy, the District has made a commitment to utilize CARB's Technology Clearinghouse[88] as an authority on control technology requirements. The Technology Clearinghouse is a work-in-progress by CARB and will include emission limits and control technologies for specific industries and sources. Beginning on January 1, 2020, the District will use the Technology Clearinghouse as a reference in developing Best Available Control

[88] CARB. 2018. Interim Technology Clearinghouse. Version 1.0. September 27. Available at: https://www.arb.ca.gov/techclearinghouse/. Accessed: August 2019.

Technology (BACT) and Best Available Control Technology for TACs (T-BACT) for any new or modified source permitting processes within or directly surrounding the Corridor. This will result in the substitution over time of older control technologies with newer, more efficient ones designed to limit air emissions. Given the general nature of this strategy, an estimate of its potential emission reductions is unavailable at this time.

4.4.4 Enforcement Strategies

Enforcement of rules and regulations in the Corridor is the responsibility of CARB and District staff. Many improvements to enforcement-related processes can be implemented without requiring new regulatory processes, thus presenting an opportunity to rapidly address Community concerns and deliver emission reductions. In conjunction with the development of this Plan, both the District and CARB conducted a three-year retrospective review of enforcement activities in the Corridor, the results of which are discussed in Section 5.2. The retrospective review allowed the District and CARB to identify opportunities for enhanced enforcement activities. Under this Plan, the District is proposing to:

- Install cameras in the desert west of the Corridor and make the video feed available to the public so that potential exposure concerns can be monitored. (E-1, Tier 1)
- Provide cross-agency training to improve violation response time. (E-2, Tier 1)
- Increase community outreach by providing industry-specific workshops and trainings. (E-3, Tier 1)
- Publish a quarterly newsletter which includes information on enforcement statistics and rule changes. (E-4, Tier 1)
- Form a dedicated outreach team to understand community's enforcement-related concerns. (E-5, Tier 1)
- Facilitate the complaint process in order to increase public access to filing of complaints. (E-6, Tier 1)
- Make strategic updates to ICAPCD Policy 17, *Guidelines for Staff Processing and Investigation of Complaints*. (E-7, Tier 1)
- Make strategic updates to:
    - ICAPCD Policy 18, *Notices of Violation Issuance and Follow Up*
    - ICAPCD Policy 28, *Notices to Comply – Administrative Guidelines* (E-8, Tier 1)
- Perform an annual retrospective review of enforcement statistics in order to identify areas of potential improvement and focus for the upcoming year. (E-9, Tier 1)
- Work with CARB to identify enforcement strategies within CARB's current regulatory programs that could benefit the Corridor, as detailed in Section 5.3.1. (E-10, Tier 1)

See Section 5.3.1 for detailed descriptions of the above enforcement strategies. The enforcement strategies are expected to result in improved compliance; however, the potential emission reductions associated with these strategies are not readily quantifiable.

4.4.5 Incentives-Based Strategies

Incentive funding programs support the introduction and expedited deployment of clean technologies beyond regulatory requirements. These technologies can contribute to improvements in regional and local air quality.

4.4.5.1 Existing Funding Programs

As discussed in Section 3.2.4.1, there are several incentive programs that are currently being administered by the District within Imperial County. These include: the Carl Moyer Program, which provides financial incentives and funding for the replacement of older on-road vehicles and other equipment; the FARMER Program, which provides funding for the replacement of older agricultural equipment; the Lawn Equipment Exchange Program, which provides discounts on zero-emission lawn equipment; and other general funding programs for various types of projects in the County. The District intends to continue administering these programs as long as funding and projects are available and will look for opportunities to leverage the funds from these programs for strategies in this Plan, when synergies exist. Information on the emission reductions achieved to date through these programs is provided in Section 3.2.4.1.

4.4.5.2 Potential Funding Programs

In addition to those programs already in place within Imperial County, the District has identified other potential funding programs that could provide additional incentive-based emissions and exposure reductions.

I-1 – Wood Burning Device Grant Program (Tier 1)

The Woodsmoke Reduction Program is administered by CARB and offers financial incentives for the replacement of residential wood burning devices with more efficient equipment.[89] While the District has not yet participated in this program, it represents an already-established opportunity with funds available to produce emission reductions of pollutants generated from wood burning, such as particulate matter. Even though Imperial County is a desert, emissions from wood burning can deteriorate the local air quality, particularly during the winter when inversions are common.

CARB has created a Benefits Calculator Tool for the Woodsmoke Reduction Program to assist in estimating emission reductions from the replacement of wood burning devices.[90] Emission factors

[89] More information available at: https://www.arb.ca.gov/planning/sip/woodsmoke/reduction_program.htm. Accessed: August 2019.
[90] CARB. Benefits Calculator Tool for the Woodsmoke Reduction Program. Draft. Available at: https://ww2.arb.ca.gov/resources/documents/cci-quantification-benefits-and-reporting-materials?corr. Accessed: August 2019.

in the tool are from CARB's emission inventory methodology for residential wood combustion[91] and USEPA's AP-42.[92] The 2018-2019 Woodsmoke Reduction Program Guidelines were released on May 21, 2019.[93] Per the guidelines, the deadline for executing all grant agreements is June 30, 2020. In addition, any work done prior to a District grant agreement being fully signed and executed will be ineligible for funding. As a result, the District is currently in the process of identifying eligible projects for the program and anticipates completing the grant agreement before the June 30, 2020 deadline. As part of this process, the District intends to solicit input from the Steering Committee on both identifying and prioritizing potential projects for funding. The District anticipates that it will be able to identify at least three eligible projects for this fiscal year appropriation. Table 4.5 presents the estimated emission reductions and cost-effectiveness data associated with this strategy, assuming three units are replaced in 2020 (see Appendix G for calculation details). These reductions would apply to the area-wide residential fuel combustion community-level emission inventory category (see Section 3.2.2.2).

Table 4.5. Estimated Emission Reductions Associated with Wood Burning Device Grant Program

	$PM_{2.5}$	NO_X	VOC
Emission Reductions, 2020-2024 (tons per year)	0.13	0.01	0.13
Cost Effectiveness ($/ton)	$5,424	$88,383	$3,516

I-2 – Urban Greening Incentive Programs (Tier 2)

On multiple occasions, members of the Steering Committee and members of the public in attendance at Steering Committee meetings have expressed interest in planting trees and other vegetation within the Corridor to mitigate air quality impacts. Under this strategy, the District would monitor for and identify potential grant programs for urban greening projects. Each year, for the next five years, the District would report on whether there are any new urban greening incentive program funding applicable to the Corridor and if so, the number of applications submitted by the District or partner agencies and accepted. Any funding obtained would be put towards projects sought under Strategy M-2, Urban Greening Projects. As mentioned under Strategy M-2, the District would solicit input from the Steering Committee on both identifying and prioritizing

[91] CARB. 2015. Section 7.1. Residential Wood Combustion. October. Available at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-1_2011.pdf. Accessed: August, 2019.
[92] USEPA. AP-42 Section 1.5, Liquified Petroleum Gas Combustion. Available at: https://www3.epa.gov/ttnchie1/ap42/ch01/final/c01s05.pdf. Accessed: August 2019.
[93] CARB. 2019. Woodsmoke Reduction Program. Program Guidelines. Fiscal Year 2018-2019 Appropriation. May 21. Available at: https://ww3.arb.ca.gov/planning/sip/woodsmoke/2018_2019_wrp_guidelines.pdf. Accessed: August 2019.

potential projects for funding. Because the future availability of applicable incentive programs is unknown, this strategy has been categorized as Tier 2.

4.4.5.3 Outreach Strategies

Updates will be provided as available to keep the public informed on the various programs available for funding emission reduction and exposure projects within the Community. This information will be communicated during the regular Steering Committee meetings, when the public and Steering Committee members can discuss new opportunities and the Community's potential involvement. Additionally, resources will be provided on the Imperial County AB 617 website regarding specific programs and planned or potential participation by the County or Community. For programs which may have widespread applicability to businesses or individuals in the Community, the Steering Committee will collaborate with ICAPCD to host interactive workshops to inform the public on how they can be involved or receive funding for the program's emission reduction efforts.

4.4.6 Land Use Strategies

Land use strategies can address issues arising from the proximity of sensitive receptors to emission sources. While land use decisions are generally made by local city planners, the 2017 Update to the State of California General Plan Guidelines[94] specifically requires planners to consider air quality and environmental justice in land use decisions. By actively engaging with local cities on land use decisions, the Steering Committee and the District can promote improved outcomes.

L-1 – Paving Project Identification (Tier 1)

As discussed in Section 3.2.3.2, fugitive windblown dust and unpaved road dust are among the top three contributors to $PM_{2.5}$ emissions in the Corridor. Results from an interactive poll that was conducted during the July 24, 2019 Steering Committee Meeting (Appendix H.2) show that approximately 50% of public attendees and 70% of Steering Committee members were in favor of implementing parking lot paving projects in the Corridor. Under this strategy, the District is proposing to work with local public works departments and other representatives from the communities of El Centro, Heber, and Calexico to identify locations that could benefit from paving projects. Potential paving projects include well-traveled unpaved roads, parking lots, and unpaved areas located near sensitive receptors including, but are not limited to, schools and senior centers. The District intends to solicit input from these entities by July 1, 2020 and have a list of locations that would benefit from paving available within six months from that date. This list, along with input from the Steering Committee, would inform the projects sought under Strategy M-3, Parking Lot Paving Projects.

[94] Governor's Office of Planning and Research. 2017. State of California General Plan Guidelines: 2017 Update. July 31. Available at: http://www.opr.ca.gov/planning/general-plan/. Accessed: August 2019.

L-2 – General Plan Comment and Review (Tier 2)

California state law requires every city and county to have a general plan, which then serves as the foundation upon which all local land use decisions are based. The Land Use element of a general plan generally designates the distribution of land uses for housing, business, industry, open space, education, public buildings, etc., while the Circulation element identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, etc. Additional elements address conservation, open space, noise, and safety. In addition, Senate Bill 1000 (SB 1000), adopted in 2016, requires cities and counties to include an Environmental Justice element in their general plans, or related goals, policies, and objectives integrated in other elements, that identify disadvantaged communities. The general plans must identify objectives and policies to, among other items, reduce the unique or compounded health risks in disadvantaged communities.[95]

General plans are routinely reviewed and updated. Land use policy in the Corridor is managed by several entities including Imperial County, City of El Centro, and the City of Calexico. Imperial County is responsible for the unincorporated areas of the County while the cities of El Centro and Calexico are responsible for the incorporated areas of their respective cities. Land use policies for each of these areas is discussed in detail in Section 3.2.5.2. As discussed in Section 3.2.5.3, the proximity of residential and sensitive land uses to industrial and agricultural land uses was identified as a concern in the *Imperial County AB 617 Community Nominations* report.[96] Because land use and transportation planning decisions can have a significant impact on the exposure of air pollutants to sensitive receptors, under this strategy the Steering Committee and the District are proposing to track and review local general plan updates on a quarterly basis (so long as the Steering Committee is active) and issue a joint comment letter, as appropriate, when a local action has the potential to affect air quality or exposure in the Corridor.

L-3 – Urban Greening Project Identification (Tier 2)

Under this strategy, the District is proposing to work with local representatives from the planning departments and communities of El Centro, Heber, and Calexico to create an area-wide plan that identifies potential locations where urban greening projects (i.e., projects involving the installation of trees and vegetative barriers) could be implemented to mitigate air quality impacts to sensitive receptors. Possible locations include at parks and schools, along highways, and near industrial sources. The District intends to solicit input from these entities by July 1, 2020 and have a list of potential locations, including prioritization, available within 6 months from that date. This list, along with input from the Steering Committee, would inform the projects sought under Strategy M-2, Urban Greening Projects.

[95] SB 1000, Leyva. Land use: General Plans: Safety and Environmental Justice. September 24, 2016. Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1000. Accessed: August 2019.

[96] Available at: https://ww2.arb.ca.gov/resources/documents/imperial-county-ab617-community-nominations-submitted-partnership-comite-civico. Accessed: August 2019.

L-4 – Open Areas Strategies (Tier 2)

Under this strategy, ICAPCD proposes to work with local agencies and interested stakeholders to assess the feasibility of implementing emission reduction measures in the open areas and/or desert areas west of the Corridor. These areas are known to produce particulate matter emissions which can affect the residents of the Corridor. As part of this strategy, the District may pursue technical studies (e.g., soils testing) that could help characterize the source areas. Within one year from approval of this Plan, ICAPCD is proposing to hold at least one stakeholder meeting to discuss the feasibility of measures under this strategy. Through these discussions, any barriers to measures should be identified, as well as the need for any supplementary studies. The outcome of these discussions will be used to determine if one or more measures under this strategy are viable and can be recategorized as Tier 1 strategies in 2021 and beyond.

4.4.7 Transportation Strategies

In the Corridor, the proximity of mobile emission sources to nearby sensitive receptors such as schools, homes, day care centers, and hospitals can exacerbate the cumulative exposure burden. Transportation planning processes can help address these proximity issues. The community-level emissions inventory found that on-road mobile sources contribute approximately 4 percent of the $PM_{2.5}$ emissions total. Additionally, the technical analyses conducted for the ICAPCD 2018 SIP for the Annual $PM_{2.5}$ NAAQS involved a type of source apportionment analysis which found that most of the $PM_{2.5}$ from mobile and secondary nitrate sources at the Calexico monitor originated from the United States-Mexico border crossing area.

T-1 – Border Activity Strategies (Tier 2)

Under this strategy, ICAPCD proposes to work with local transportation agencies and other bodies to assess the feasibility of implementing measures that reduce the impact of activities at the border. The impact of the border is not limited to emissions from idling and truck traffic along highways. There are additional exposure impacts related to auxiliary services, deliveries, etc. that make the impact more expansive. One possible measure under this strategy would be to evaluate alternative routes for traffic coming through the ports-of-entry. For example, currently, the highway from the West Port of Entry runs from the border, directly through the center of Calexico. If traffic were instead routed to the outskirts of Calexico into less populated areas, the exposure burden to the Community could be reduced. Other heavily traveled routes could also be evaluated as part of this strategy. Within one year from approval of this Plan, ICAPCD is proposing to meet at least twice with local transportation agencies to discuss the feasibility of measures under this strategy. Through these discussions, any barriers to measures should be identified, as well as the need for any supplementary studies. The outcome of these discussions will be used to determine if one or more measures under this strategy are viable and can be recategorized as Tier 1 strategies in 2021 and beyond.

T-2 – Signage to Reduce Idling (Tier 2)

Under this strategy, ICAPCD proposes to solicit input from local school districts, senior facilities, and medical centers to determine if installing signage that encourages vehicles not to idle near these sensitive receptor land uses would be found as beneficial. Within one year from approval

of this Plan, ICAPCD is proposing to host at least one workshop on this topic. During the workshop, the following topics may be discussed: 1) the health impacts of vehicle exhaust, 2) communities that have had similar signage initiatives, 3) proposed signage language, and 4) estimated potential cost. The outcome from the workshop will be used to determine if this strategy is viable and can be recategorized as a Tier 1 strategy in 2021 and beyond.

T-3 – Truck Idling Education and Outreach (Tier 1)

Under this strategy, ICAPCD proposes to partner with CARB to conduct education and outreach to reduce the amount of truck idling in the Corridor. Within one year from approval of this Plan, ICAPCD is proposing to conduct at least one workshop for local businesses that have heavy-duty truck fleets operating in the Corridor. If interest and attendance is favorable, training sessions would continue to be scheduled yearly through 2024, with additional outreach and education occurring through the District's quarterly newsletter publication, as discussed in Section 5.3.1.1.

4.4.8 Mitigation Strategies

As discussed in Section 3.2.5, at least 83 sensitive receptor locations have been identified in the Corridor. These entities, and the broader Community, are exposed to elevated concentrations of pollutants on a daily basis as the Corridor exists in an area that is designated as nonattainment for the 8-hour O_3, 24-hour PM_{10}, and 24-hour and annual $PM_{2.5}$ NAAQS. As discussed in Chapter 3, a variety of emission sources contribute to the exposure burden. The community-level emissions inventory, presented in Section 3.2.2, shows that the top three contributors to $PM_{2.5}$ emissions in the Community are fugitive windblown dust (which can originate from open areas), fuel combustion from stationary and area-wide sources, and unpaved road dust. Top contributors to TACs in the Community are DPM from off-road mobile sources and on-road mobile sources. In addition, the source attribution analysis conducted for the ICAPCD 2018 SIP for the Annual $PM_{2.5}$ NAAQS confirmed that biomass burning, mobile sources, and impacts from across the border contribute heavily to the exposure burden at the Calexico monitor (i.e., the southern portion of the Corridor). Ultimately, health protective mitigation measures and practices can help reduce the exposure burden of a community.

M-1 – Air Filtration Systems (Tier 1)

Air filtration systems have been shown to be effective in significantly reducing concentrations of DPM, particulate matter, and other pollutants in the indoor environment. Results from an interactive poll conducted during the July 24, 2019 Steering Committee Meeting (Appendix H.2) show that approximately 83% of public attendees and 67% of Steering Committee members were in favor of implementing air filtration projects at schools and sensitive receptor locations. Under this strategy, the District is proposing to install air filtration systems on up to 240,000 square feet of building space at sensitive receptor locations including, but not limited to, schools and senior centers. While this translates to approximately twelve schools (or approximately 240 1,000-square foot classrooms), the type and location of the air filtration projects would be informed by input from the Steering Committee. At the August 14, 2019 Steering Committee Meeting, the Steering Committee and the public participated in an electronic polling exercise which asked them to prioritize schools for the installation of air filtration projects (see Appendix H.2). One piece of the

feedback received during this exercise was that the Steering Committee wanted to consider more health data (e.g., asthma and absentee rates) before making any final decisions. The Steering Committee also proposed possibly making the air filtration projects a competitive process. These items will be a topic of discussion at future Steering Committee meetings. The District anticipates that installation of the systems would occur evenly over a five-year period (2020-2024).

M-2 – Urban Greening Projects (Tier 1)

Urban greening projects establish and enhance the built environment by using natural solutions to mitigate air quality impacts. The results from the interactive poll conducted during the July 24, 2019 Steering Committee Meeting showed that approximately 64% of public attendees, and 70% of Steering Committee members were in favor of implementing urban greening projects (also known as green space projects). Under this strategy, the District is proposing to initially designate a minimum of $200,000 in AB 617 funding towards the implementation of urban greening projects within the Corridor. The location and priority of these projects would be informed by input from the Steering Committee and the outcome of Strategy L-3, Vegetation Planting Location Identification. The District anticipates that implementation of the projects would occur evenly over a five-year period (2020-2024). The District will increase the number of urban greening projects implemented if they are able to obtain incentive funding under Strategy I-2, Urban Greening Incentive Programs.

M-3 – Parking Lot Paving Projects (Tier 1)

As previously discussed in this Plan, fugitive windblown dust and unpaved road dust are top contributors to PM_{10} and $PM_{2.5}$ emissions in the Corridor. Paving is one approach to reducing emissions from these source categories. Under this strategy, the District is proposing to fund parking lot paving projects within the Corridor, as funding permits. The locations and priority of these projects would be informed by input from the Steering Committee and the outcome of Strategy L-1, Paving Project Identification. In addition, the District has taken early action under this strategy by implementing a parking lot paving project in the fall of 2019 at the Calexico Unified School District's Maintenance and Operations Department property in Calexico. Table 4.6 presents the estimated emission reductions and cost-effectiveness data associated with a hypothetical 1.5 acre project (see Appendix G for calculation details). Any reductions resulting from this strategy would apply to the area-wide unpaved road dust community-level emission inventory category (see Section 3.2.2.2).

Table 4.6. Estimated Emission Reductions Associated with Parking Lot Paving

	$PM_{2.5}$	PM_{10}
Emission Reductions (tons per year)	0.20	1.97
Cost Effectiveness ($/ton)	$307,131	$30,698

M-4 – Expanded/Improved School Flag Program (Tier 1)

The School Flag Program in Imperial County uses colored flags based on USEPA's Air Quality Index to notify teachers, coaches, students, and others about outdoor air quality conditions. Schools raise a colored flag each day that corresponds to the local air quality forecast. The purpose of the program is to create public awareness of outdoor air quality conditions and allow schools, coaches, and parents to make decisions on air pollution exposure, including whether it is appropriate for children to exercise outside on any given day.

The results from the interactive poll conducted during the July 24, 2019 Steering Committee Meeting (Appendix H.2) show that approximately 55% of public attendees and 80% of Steering Committee members were in favor of expanding the School Flag Program. Currently, the program is implemented with varied success in the Corridor. Under this strategy, 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 implementation. It is expected that this outreach and training would occur up until the end of 2020. Under this strategy the District would also consider ways to enhance the school flag program, including the potential for use of electronic marquee signs.

M-5 – Strategic updates to Policy 34, Agricultural Burning Procedures (Tier 1)

Agricultural burning is a common practice in Imperial County and can contribute to the exposure burden in the Corridor under certain meteorological conditions. Under this measure, the District is proposing to update Policy 34, Agricultural Burning Procedures for Allocating Acreage, Burn Day Decisions, and Tracking. These updates would qualify as early action, as they would be adopted shortly after the adoption of this Plan. These updates include:

- Reducing the maximum number of acres burned in any single day from 2,000 to 1,600 acres, with a maximum of 400 acres per quadrant of Imperial Valley.
- Prioritizing burns with smaller acreages (<70 acres) and providing growers the option to divide their fields into smaller sections and request permission to burn the smaller sections on an individual basis.
- Adding more detail to the policy's section on "Special Burns", which are to be considered as any burns located within a specified radius of a residential area, school, or heavily traveled road. Furthermore, this radius is being increased from 1.5 miles to 2.0.

These updates to the policy will result in a reduction in the maximum allowable acres burned per day, which is expected to result in a reduction up to 6.6 tons of $PM_{2.5}$ per day (see Appendix G for calculations details). Actual emission reductions will depend on the number of burn days each year and the frequency of burning up to the maximum acres allowed under Policy 34. Emission reductions from this strategy would apply to the area-wide managed burning and disposal community-level emission inventory category (see Section 3.2.2.2).

M-6 – School Bus Replacement

As discussed in Section 3.2.3.2, the largest contributor to cancer risk in the Corridor is DPM from off-road and on-road mobile sources. School buses frequently operate on diesel and are often in close proximity to sensitive receptors, like students. Results from an interactive poll that was conducted during the July 24, 2019 Steering Committee Meeting (Appendix H.2) show that approximately 75% of public attendees and 70% of Steering Committee members are in favor of implementing school bus replacement projects in the Corridor. Under this strategy, the District is proposing to replace five school buses between 2020 and 2025. Emission reduction estimates assume that existing buses to be replaced are model year 1999 or older, and that the new buses will be electric and have a lifespan of 10 years. Table 4.7 presents the estimated emission reductions and cost-effectiveness data associated with this strategy, assuming one bus is replaced per year between 2020 and 2024 (see Appendix G for calculation details). The District also intends to evaluate the cost-effectiveness and feasibility of replacing diesel buses with natural gas buses under this strategy. Emission reductions from this strategy would apply to the on-road buses community-level emission inventory category (see Section 3.2.2.3).

Table 4.7. Estimated Emission Reductions Associated with School Bus Replacement

	PM	NO_X	VOC
Emission Reductions, 2020 (tons per year)	0.004	0.091	0.007
Emission Reductions, 2024 (tons per year)	0.02	0.46	0.04
Average Cost Effectiveness ($/ton)	$10,790,221	$454,249	$5,395,790

5 Enforcement Plan

5.1 Enforcement Overview

Enforcement of regulations by CARB and District staff is critical to achieving air quality goals. The primary function of enforcement activities is to improve compliance with air quality rules and regulations. Enforcement responsibilities for regional and local air quality issues are jointly shared between the District and CARB. CARB is primarily responsible for the enforcement of mobile source rules, while the District is responsible for area-wide and stationary source enforcement. In some cases, CARB has established memoranda of understanding with the District to delegate enforcement authority.

5.1.1 ICAPCD Enforcement Overview

The ICAPCD Enforcement Division consists of six compliance and enforcement personnel, including four compliance inspectors, one air quality specialist, and one manager. Enforcement officers perform inspections of facilities holding permits to determine compliance with District rules and regulations, permit conditions, and state and federal rules on an annual basis. Each permit is a written authorization by ICAPCD to install and operate equipment that emits or controls emissions of air contaminants. The permit contains conditions under which the equipment can be operated, including limits on material use or operation time, and/or recordkeeping requirements, as applicable. During these inspections, the inspector reviews processes and operations to determine compliance status. The inspector also reviews the facility's permit to determine its compliance status with each condition. Inspectors also conduct inspections on units registered through CARB's Portable Equipment Registration (PERP) program.

Additionally, the Enforcement Division investigates all air quality complaints. Complaints can be filed through the District's general phone number (1-442-265-1800), the Cal-EPA website,[97] or the CARB website.[98] Imperial County residents may also file environmental reports online through the IVAN Imperial website.[99] Complaints made through the IVAN Imperial website are currently monitored by the Imperial County Certified Unified Program Agency (CUPA), who then directs the complaints to the appropriate agencies. To ensure the quickest response time possible, the IVAN website requests that if the complaint is an air pollution problem that it first be submitted directly to the District. The District's general phone number is active during business, non-business, weekend, and holiday hours. The District logs the call and then assigns the complaint to an inspector. Every complaint received by ICAPCD is investigated within 24 hours of receipt. During regular business hours complaints are assigned to area inspectors as soon as possible. Enforcement personnel contact all complainants, unless the complainant has indicated otherwise, or has filed an anonymous complaint. Enforcement officers record details of all complaint investigations, including a statement for the complainant, the date and time of contact, whether the contact was in person or by telephone, whether the complaint was confirmed, the location of

[97] Information available at: https://calepacomplaints.secure.force.com/complaints/Complaint. Accessed: August 2019.
[98] Information available at: https://www.arb.ca.gov/enf/complaints/complaints.htm. Accessed: August 2019.
[99] Information available at: https://ivan-imperial.org/report. Accessed: August 2019.

the area inspected, and additional details as needed. This information is maintained within the District's archives.

During facility inspections and in response to complaints, enforcement officers issue NTCs for minor compliance issues and NOVs for more serious compliance issues, as necessary. These notices serve as a deterrent for non-compliance and occasionally have fines associated with them.

5.1.2 CARB Enforcement Overview

The mission of CARB is to promote and protect public health, welfare, and ecological resources through the effective and efficient reduction of air pollutants while recognizing and considering the economy of the State. CARB adopts regulations designed to reduce criteria pollutants, toxic air contaminants, and GHG emissions. While it is the responsibility of industry to meet regulatory requirements, CARB works to ensure that regulated industries are aware of, and understand, the requirements of each regulation. The effectiveness of each regulation depends on industry compliance. CARB's enforcement program is designed to deter noncompliance and to ensure regulated industries that have not met CARB's regulatory requirements are brought into compliance.

The Enforcement Division seeks to achieve CARB's mission through the fair, consistent, and comprehensive enforcement of air pollution laws, and by providing training and compliance assistance. Enforcement efforts need to be focused to ensure compliance, especially in communities that may be disproportionately impacted by air pollution. These efforts include responding to concerns from the public when they are being impacted by a violation, providing compliance assistance to regulated entities, conducting inspections and investigations to gather additional information, and taking enforcement action when necessary to resolve noncompliance as quickly as possible.

Enforcement of Compliance

Strategies to enforce compliance are response mechanisms to non-compliant sources and are intended for authorities to respond to different types of violations. The objective of these strategies are the following:

- Return violators to compliance.
- Impose sanctions.
- Remove economic benefit of non-compliance.
- Require specific actions including but not limited to test, monitor or information release.
- Correct environmental damages.
- Correct internal company management problems.

Types of Enforcement Actions

There are three types of legal processes that CARB may use to resolve violations: civil, administrative, and criminal. Each type is defined as follows:

1. Civil Action: In cases where a mutual settlement cannot be reached, CARB may refer the matter to the Attorney General for civil litigation. As part of the civil process, CARB can obtain a court order or injunction to stop ongoing violations.

2. Administrative Action: CARB has the authority to seek administrative penalties for some violations. In this process, administrative hearings are conducted by administrative law judges using CARB's administrative hearing procedures.

3. Criminal Action: In some cases, CARB may identify potential criminal violations. In those instances, the case may be referred to the Attorney General, a District Attorney, or other prosecutors for criminal prosecution.

Whether pursuing civil or administrative penalties, CARB retains the ability to negotiate mutual settlement agreements at any point before a final court ordered resolution of the case. The settlement agreement may include a compliance plan and penalties dependent on the facts and circumstances of the case. Assessed penalties may include:

- Monetary penalties as a common sanction used in enforcement response: There are several basis on which to calculate the appropriate monetary penalty. CARB will determine the appropriate penalty in each case.

- Denial or revocation of permits: CARB may require the company to cease at least part of its operation for being in clear and direct violation of the law.

- Shutdown of operations: CARB may be able to shut down operations. The threat of a shutdown is considered an effective deterrent since it directly affects profits.

Supplemental Environmental Projects (SEPs)

Through the enforcement process, those found to be in violation are required to come into compliance, and usually also pay a penalty. In some cases, CARB or air districts may allow the responsible party to satisfy part of the monetary penalty by voluntarily offsetting a portion of their civil penalty by performing or funding one or more Supplemental Environmental Projects. CARB runs an active program where projects proposed by disadvantaged community groups are matched to violators willing to fund those projects through a Supplemental Environmental Project.

Enforcement efforts throughout the State are strategically planned and implemented by the following Enforcement Division Branches:

- Citations and Registrations Enforcement Branch

- Diesel Programs Enforcement Branch

- Vehicle, Parts, & Consumer Products Enforcement Branch

- Field Operations Branch
- Enforcement Support Branch

CARB is the primary authority responsible for developing and enforcing regulations to control emissions from portable and mobile sources and consumer products in California, except in cases where federal law preempts CARB's authority. Although CARB has authority to regulate emissions from these sources, it does not have authority to enforce where vehicles drive or park. Inspection and enforcement for the following sources may be conducted by CARB:

- Portable equipment
- Heavy-duty idling
- Cargo handling equipment
- Off-road construction equipment
- Drayage trucks
- Transport refrigeration units

Enforcement Division also implements a set of actions to achieve compliance within the regulated entities and correct situations that endanger public health. These actions include:

- Inspections to determine the compliance status of the regulated companies and detect violations.
- Negotiations to develop mutually agreeable schedules and approaches for achieving sustainable compliance.
- Legal action taken where necessary, to compel compliance and impose consequences for violating the law or posing a threat to public health or environmental quality.
- Compliance promotion through educational programs and technical assistance.

CARB enforcement programs cover vehicles, diesel engines, consumer products, and GHG emissions from industries. The goal of CARB enforcement programs is to achieve comprehensive compliance in every regulation the Board adopts. Through enforcement, CARB works to bring responsible parties into compliance and in doing so achieve a level playing field across industry so that no company can benefit from non-compliance at the expense of another; and to deter industry from future violations.

CARB applies enforcement programs professionally in accordance with its enforcement policy which was updated in 2017. CARB Enforcement Division uses data and inspections to identify potential non-compliance, and then investigates each case. Once a violation is identified, the responsible party is notified. CARB works with the party to achieve compliance and measure the relevant facts and circumstances of each case, relative to factors set in law and described in our enforcement policy, to determine an appropriate penalty. The case is settled when the responsible

party has achieved compliance and paid an appropriate penalty. If the case cannot be settled, CARB legal staff refer the case to the California Attorney General for litigation.

CARB Enforcement Division has approximately 50 staff members designated to enforce heavy-duty diesel programs. CARB is committed to allocating sufficient resources to the El Centro-Heber-Calexico Corridor to effectively implement the enforcement plan within the Corridor.

5.2 Three-Year Retrospective Reviews of Enforcement

Both the District and CARB conducted a three-year retrospective review of enforcement in the Corridor to inform the development of targets, strategies, and the enforcement plan. Ultimately, this review included a summary of complaints received and their resolution, a listing of permitted facilities and their type, the number and type of inspections conducted, a list of Notices of Violation and Notices to Comply issued, an assessment of compliance with CARB and District rules and regulations, and a discussion of opportunities for enhanced enforcement activities.

5.2.1 ICAPCD Enforcement Review

ICAPCD prepared a three-year retrospective review to help inform development of strategies to enhance enforcement in the District. There are currently 212 ICAPCD permitted facilities operating in the El Centro-Heber-Calexico Corridor with 257 permitted units. The permits at these facilities cover a wide range of operations, including combustion, spraying of coatings, service stations, and geothermal energy. ICAPCD inspected 100 percent of the facilities within the El Centro-Heber-Calexico Corridor annually from 2016 to 2018. During that time, the District issued 78 NTCs and 79 NOVs to the facilities within the Corridor. Of those violations, approximately 67 percent were administrative in nature, including failure to submit annual reports, failure to apply for permits, and failure to submit fees. The remaining violations were related to dust and opacity (3%), open burns (1%), service station maintenance (10%), and other stationary source violations (16%). A non-compliance rate can be defined as:

$$\frac{Number\ of\ facilities\ receiving\ violations}{Total\ number\ of\ facilities}$$

Using this definition, the Corridor had an overall non-compliance rate between 14 and 22 percent from 2016 to 2018.

ICAPCD received 75 complaints in the El Centro-Heber-Calexico Corridor from 2016 to 2018. Sixty-six percent of these complaints were related to dust, open burning, and smoke. These complaints predominantly resulted in issuance of warnings, or situations where nothing is found upon inspection. Appendix F contains tables detailing the results of the three-year retrospective review of enforcement.

Based on the 3-year retrospective review, there are a number of opportunities for enhanced enforcement in the Corridor. As discussed above, the emissions-related NOVs and NTCs were written predominantly for stationary source and service station activities, and also include dust and opacity, and open burning. ICAPCD intends to increase the compliance rate long term through the enhanced enforcement measures described in Section 5.3 below.

5.2.2 CARB Enforcement Review

CARB prepared a three-year retrospective review of enforcement activities in the El Centro-Heber-Calexico Corridor. The following sections contain a description of programs implemented in the Corridor by CARB for the years 2016 through 2018, this report includes compliance rate results.

Heavy-Duty Diesel Vehicles

Heavy-Duty Vehicle Inspection Program (HDVIP): The HDVIP program requires heavy-duty trucks and buses to be inspected for excessive smoke and tampering, and engine certification label compliance. Any heavy-duty vehicle traveling in California, including vehicles registered in other states and foreign countries, may be tested. Tests are performed by CARB inspection teams at border crossings, CHP weigh stations, fleet facilities, and randomly selected roadside locations.

Fuel Inspections

A primary component of the CARB's Motor Vehicle Fuels Enforcement program is the inspection of California gasoline and diesel fuel at production, transport, and dispensing facilities. CARB fuels inspectors conduct frequent, unannounced inspections of refineries, service stations, distribution and storage, bulk purchaser and consumer facilities throughout the State of California to obtain samples of gasoline and diesel fuel. During the inspection of motor vehicle fuels, gasoline and diesel samples are obtained from production, transport, and dispensing facilities and are analyzed for all regulated properties.

Consumer Products

Consumer Product inspections are an important regulatory tool to improve public health in the community. "Consumer product" means a chemically formulated product used by household and institutional consumers, including, but not limited to, detergents, cleaning compounds; polishes and floor finishes; cosmetics and personal care products; home, lawn, and garden products; disinfectants and sanitizers; aerosol paints and automotive specialty products; but does not include other paint products, furniture coatings, or architectural coatings. Consumer products, such as hairsprays, deodorants and flooring can be a source of TACs and VOCs that community members willingly bring into their homes.

Investigators in the Consumer Products program purchase samples of regulated consumer products from outlets all over California. They inspect product containers for compliance with registration and dating requirements and send selected products to the laboratory for testing

Descriptions of additional CARB enforcement programs are provided in Appendix F.

5.2.2.1 Enforcement Data Analysis

The inspection history described here includes several program inspections conducted in the El Centro-Heber-Calexico Corridor. Analysis of the enforcement data for the inspection activities in the Corridor suggests that there is a low compliance rate for Heavy-duty vehicle and Consumer

products inspection programs, and high compliance rate with low inspection occurrence for Fuels inspection programs.

The following section presents enforcement history specific to CARB programs implemented and enforced in the El Centro-Heber-Calexico Corridor. An overall analysis of this information is made in further sections.

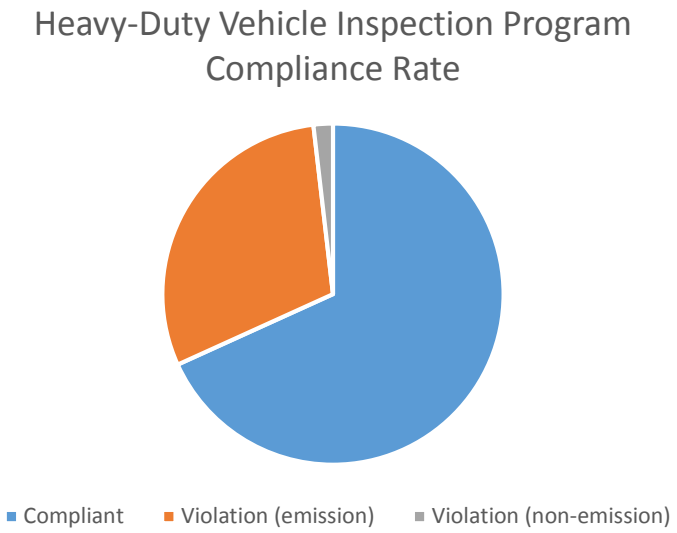
Complaints Investigation

CARB's previous complaint management system for complaints related to heavy-duty diesel vehicles lacked the ability to track complaints by specific location. However, CARB staff have begun to work/track all complaints through the California Environmental Protection Agency Complaint Reporting system. This will allow CARB staff to better track complaints by community and to see the resolution of the complaint. Furthermore, this process will enhance CARB's complaint response by encouraging better complaint referrals (e.g. referring complaints to the proper agency and/or identifying complaints that may require multiple agencies to be involved in their resolution).

Heavy-duty Vehicle Inspection Program

Preliminary analysis of Heavy-Duty Vehicle inspection program suggests that the average compliance rate within the Imperial community is low for the average three-year enforcement history. As seen in Figure 5.1, all Heavy-Duty Vehicle inspection programs have 68% compliance rate over a three-year period (2016-2018). During this period, CARB conducted 815 inspections to Heavy-Duty Vehicles in the El Centro-Heber-Calexico Corridor. Further breakdown of the citations data indicates that 244 citations were issued for emission violations and 15 citations were issued for non-emission violations. The difference between emission and non-emission citations is that emission violations further contribute to air pollution while non-emissions violations do not. An example of a non-emission violation would be a truck not complying with labeling requirements.

Figure 5.1. Heavy Duty Vehicle Inspection Program Compliance Rate



Further details on program implementation results are shown in the Table 5.1 below:

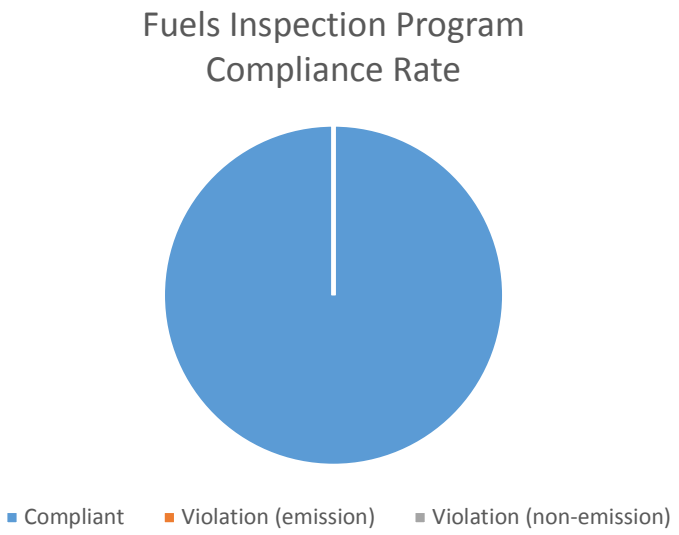
Table 5.1. Heavy-Duty Vehicle Inspection Program Results

Type of Record/Year	2016	2017	2018	Total
Inspection locations	12	9	6	27
Inspections	192	288	335	815
Compliant	15	239	302	556
Violation (emission)	167	48	29	244
Violation (non-emission)	10	1	4	15

Fuels Inspection Program

Preliminary analysis of the Fuels inspection program suggests that the compliance rate within the Imperial community is high. As seen in Figure 5.2, all Fuel programs have 100% compliance rate over a three-year period (2016-2018). However, it is important to note that during this period, CARB only conducted 25 inspections in the El Centro-Heber-Calexico Corridor, and that there is no available data for year 2018.

Figure 5.2. Fuels Inspection Program Compliance Rate



Further details on program implementation and results are shown in Table 5.2 below:

Table 5.2. Fuels Inspection Program Results

Type of Record/Year	2016	2017	2018	Total
Inspection locations	6	1	0	7
Inspections	21	4	0	25
Compliant	21	4	0	25
Violation (emission)	0	0	0	0
Violation (non-emission)	0	0	0	0

Consumer Products Program

Preliminary analysis of Consumer products program implementation suggests that the compliance rate within the Imperial community is low. As seen in Figure 5.3, the Consumer products program has a 59% compliance rate for available information (2018). During this period, CARB conducted 73 inspections for the Consumer products program in the El Centro-Heber-Calexico Corridor. Table 5.3 shows that further breakdown of the citations data indicates that one citation was issued for an emission violation and 29 citations are still pending to be resolved.

Figure 5.3. Consumer Products Program Compliance Rate

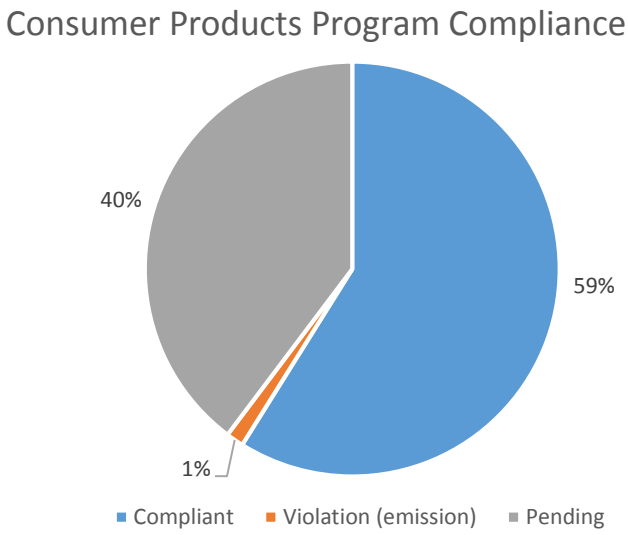


Table 5.3. Consumer Products Inspection Program Results

Type of Record/Year	2016	2017	2018	Total
Inspection locations	0	0	17	17
Inspections	0	0	73	73
Compliant	0	0	43	43
Violation (emission)	0	0	1	1
Pending resolution	0	0	29	29

CARB is working to compile information on the resolution of violations issued in Imperial County and will provide this data to the Steering Committee as it becomes available.

5.2.2.2 Settlements

This section presents an overview of settlement agreements reached between companies and CARB for violations to listed regulations in the El Centro-Heber-Calexico Corridor. Companies were found to be out of compliance during years 2016 and 2017 (available data) for Asbestos Airborne Toxic Control Measures, Truck and Bus, Emission Control Label, Smoke opacity and Mandatory Reporting of GHG Emissions.

As result of these settlements, a total of $483,300 was collected in fines due to violations, from which $447,300 went to the Air Pollution Control Fund, and $36,000 to fund Supplemental

Environmental Projects. For further details on these cases, please visit https://ww3.arb.ca.gov/enf/casesett/casesett.htm.

Table 5.4. Settlements for Year 2016

Type of Company	Settlement total	CARB	SEP	Regulation
Construction	$ 14,000.00	$ 14,000.00	$ -	Asbestos ATCM
City	$ 10,000.00	$ 10,000.00	$ -	Asbestos ATCM
Foods Distributor	$ 36,000.00	$ 27,000.00	$ 9,000.00	Truck and Bus, ECL

Table 5.5. Settlements for Year 2017

Company	Settlement total	CARB	SEP	Regulation
Trucking company	$ 19,800.00	$ 19,800.00	-	HDVIP, Truck and Bus, ECL
Trucking company	$ 54,000.00	$ 27,000.00	$ 27,000.00	Truck and Bus
Electric power company	$ 349,500.00	$ 349,500.00	$ -	Mandatory Reporting of GHG Emissions

5.2.2.3 Spatial distribution of enforcement activities

The maps shown in this section are to aide in the visualization of inspection locations. The points on the maps indicate the approximate location and number of inspections for mobile programs conducted in the El Centro-Heber-Calexico Corridor in the years 2016, 2017 and 2018. The goal of the maps is to visually display the location of program inspections to help determine gaps in CARB enforcement activity and where enhanced enforcement is necessary to deter potential violators within the community.

Figures 5.4 through 5.9 present spatial representations of enforcement activities in the El Centro-Heber-Calexico Corridor during years 2016, 2017 and 2018, by program.

Heavy-Duty Vehicles Inspection Program (All categories)

Figure 5.4. Heavy-Duty Vehicle Inspection Program Enforcement Activities: 2016

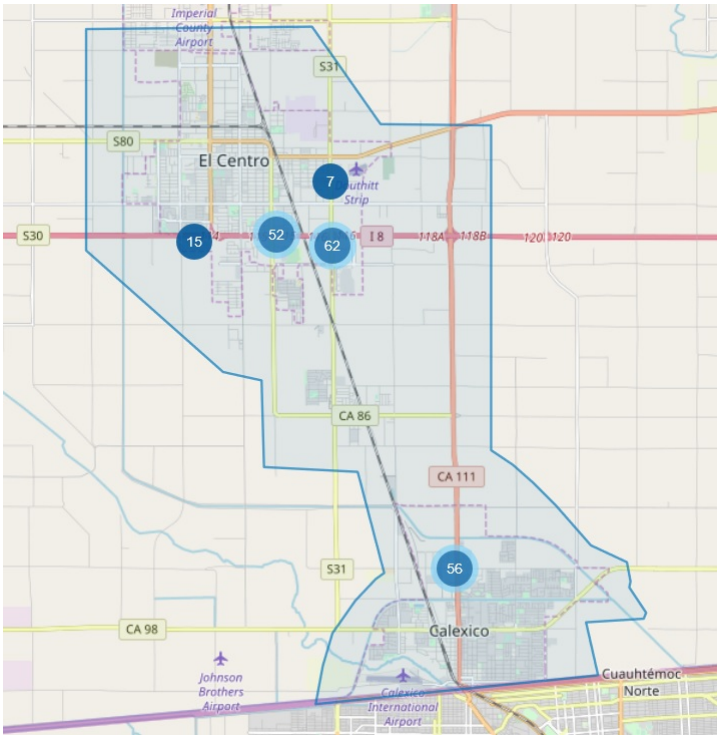


Figure 5.5. Heavy-Duty Vehicle Inspection Program Enforcement Activities: 2017

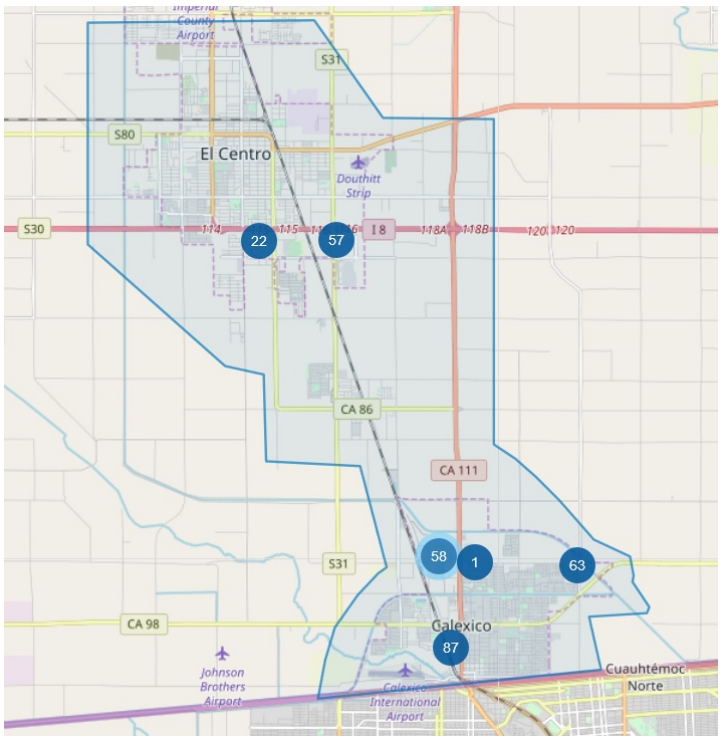
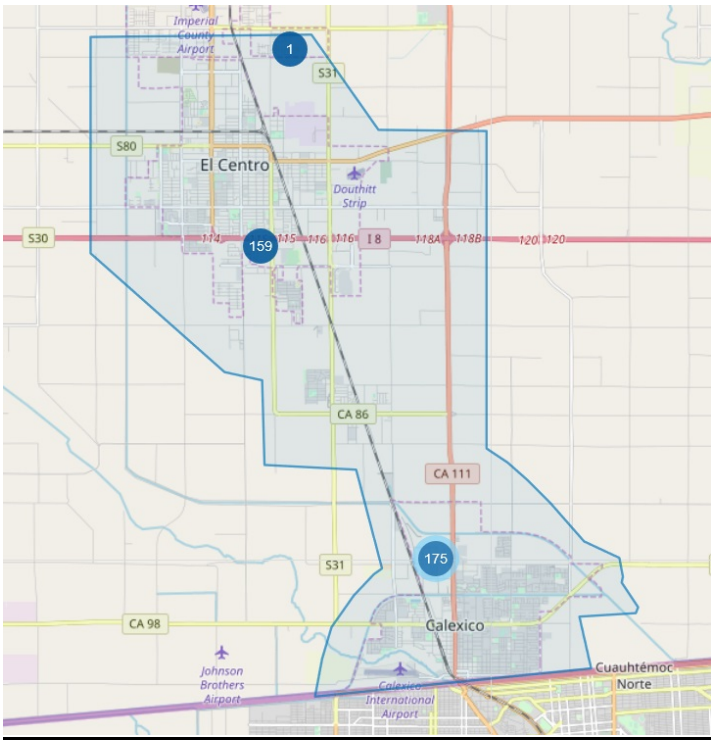


Figure 5.6. Heavy-Duty Vehicle Inspection Program Enforcement Activities: 2018



Fuels Inspection Program (All categories)

Figure 5.7. Fuel Inspection Program Enforcement Activities: 2016

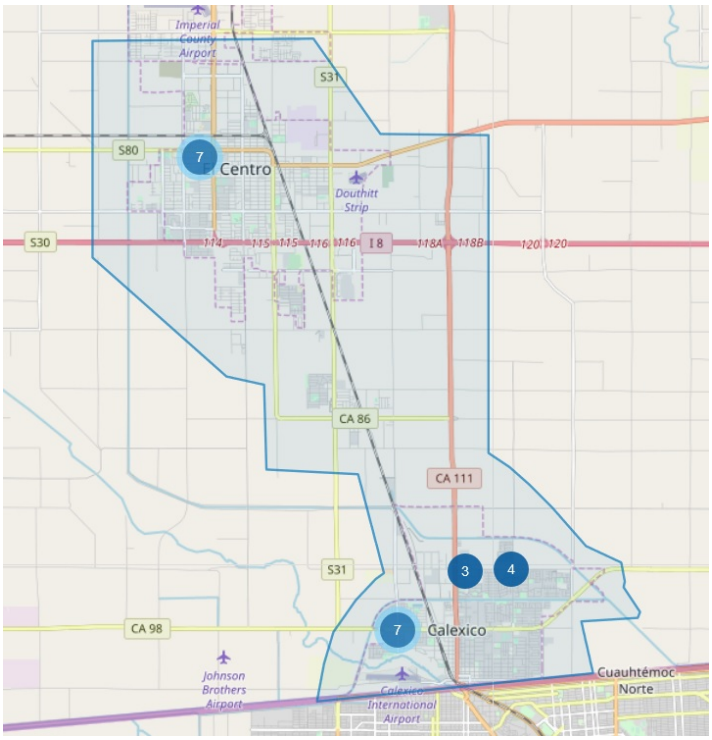
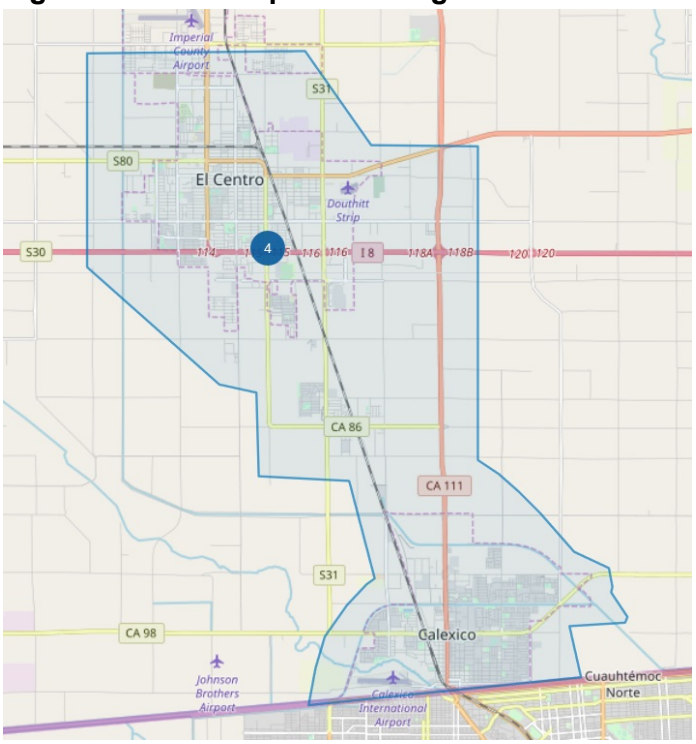
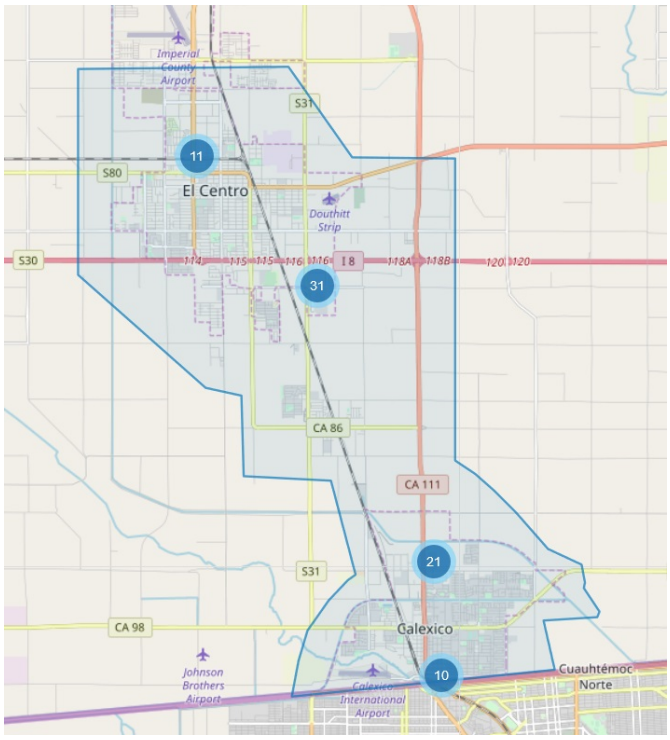


Figure 5.8. Fuel Inspection Program Enforcement Activities: 2017



Consumer Products Inspection Program (All categories)

Figure 5.9. Consumer Products Inspection Program Enforcement Activities: 2018



5.2.2.4 Findings and Compliance analysis

- There is no record of CARB enforcement programs implemented in the Heber area. This has been identified as an area of opportunity to increase enforcement activities.
- Compliance ratings range between 0% and 100%; however, the implementation of some programs may be increased.
- There is no record of HDVIP Emission Control label (ECL), Smoke Opacity and Tampering enforcement programs implemented in Heber and El Centro.
- The low compliance rate, and in some cases low inspection count observed in the 3-year history may demonstrate the need for more targeted inspections to identify compliance issues.

All listed findings are addressed in the CARB Enhanced Enforcement Measures section (Section 5.3.1.2). CARB will continue to work closely with the Steering Committee to better determine other areas of non-compliance within the El Centro-Heber-Calexico Corridor area.

5.3 Enforcement Compliance Mechanisms

Compliance with District and state rules is essential in achieving the emission reduction and exposure reduction targets for the Corridor. The sections below identify approaches to enhance compliance reporting, outreach, and enforcement.

5.3.1 Enhanced Enforcement Measures

5.3.1.1 ICAPCD Enhanced Enforcement Measures

In order to improve compliance rates within the Corridor, the District is proposing certain enhanced enforcement measures with this Plan. These measures are intended to increase community engagement, leverage inter-agency relationships, facilitate the complaint process, and generally improve enforcement in the Corridor.

Community Measures

E-1. Leveraging Technology for Greater Enforcement

ICAPCD is in the process of installing cameras in the desert on the west side of Imperial County. While this area is outside of the Corridor, the population in the Corridor could be impacted from fugitive dust originating in the desert. Under this measure, the District is proposing to make the video feed from these cameras available to the public. This would not only increase the number of eyes surveying the footage, but also allow the public to monitor for potential exposure concerns. The District anticipates that the cameras will be installed by September 2020 and proposes making the camera feed available within six months from that date. The

District would continue to provide the camera feed for as long as the cameras remain active.

E-2. Cross-Agency Training

The District is looking to establish regular communication with outside agencies in order to improve violation response time. To that end, under this measure, the District is proposing to perform cross-training of other local agencies on District rules so that they can readily identify specific types of violations. Examples of cross-training include working with the Imperial County Sheriff's Department and city representatives to learn about the dust impacts of illegal trespassing and collaborating with the fire department on properly identifying illegal burning activity. Within one year from CARB approval of this Plan, the District is proposing to conduct at least one training session for local agencies. If interest and attendance is favorable, training sessions would continue to be scheduled yearly through 2024.

E-3. Increased Community Outreach – Workshops and Trainings

The District is looking to increase community outreach through workshops and trainings to both industry and the public. Under this measure, the District is proposing to provide annual training to industry, with certain focused training (i.e., construction dust mitigation) available upon request. Additionally, the District is proposing to provide enforcement-related workshops to the community to facilitate a better understanding of local compliance issues and educate on community-driven enforcement. Within one year from CARB approval of this Plan, the District is proposing to conduct at least one training session for local industry and one workshop for the public. If interest and attendance is favorable, these training sessions and workshops would continue to be scheduled yearly through 2024.

E-4. Increased Community Outreach – Publications

The District is proposing to increase community outreach through the publication of a quarterly newsletter. This newsletter would include information on enforcement statistics and rule changes, and would be intended for local agencies, affected facilities, and the public. The District issued its first quarterly newsletter on April 3, 2019 and plans to incorporate information on enforcement statistics and rule changes within six months of CARB approval of this Plan.

E-5. Formation of a Dedicated Outreach Team

Conducting community-level outreach is key to understanding community concerns, including identification of potential violations or unpermitted sources. Under this measure, the District and CARB are proposing to form a dedicated enforcement outreach team made up of staff from the agencies to actively engage with the Steering Committee and respond to community concerns. The District is

proposing to have this outreach team assembled within six months of CARB approval of this Plan. The outreach team would continue to engage with the Steering Committee for so long as they are active.

Complaint Response Measures

E-6. Facilitation of the Complaint Process

The District is looking to facilitate the complaint process in order to increase public access to filing complaints and more accurately capture complaint information. To do this, the District is proposing to create an online complaint form, as well as add enforcement-related information on the ICAPCD website homepage (https://www.co.imperial.ca.us/AirPollution/index.asp), including publishing the complaint line (442-265-1800) and including a link to the ICAPCD complaint webpage (https://www.co.imperial.ca.us/AirPollution/index.asp?fileinc=compreport). The District is proposing to implement these changes within one year from CARB approval of this Plan.

E-7. Strategic Updates to Policy #17

Under this measure, the District is proposing to revise internal Policy #17, *Guidelines for Staff Processing and Investigation of Complaints*. The policy would be revised to specify circumstances under which NTCs, NOVs, and warnings are issued, as well as add the address of the location of concern to the complaint log. The effect of these revisions would be to both standardize the process for issuance of NTCs, NOVs, and warnings to provide uniformity, as well as assist the inspectors with locating the source of the complaint. The District is proposing to implement these changes within one year from CARB approval of this Plan.

Enforcement Improvements

E-8. Strategic Updates to Policies #18 and #28

Under this measure, the District is proposing to revise internal Policy # 18, Notices of Violation Issuance and Follow Up and Policy #28, Notices to Comply – Administrative Guidelines. The District is proposing to revise Policy #18 to include follow-up guidelines such as the time period for following up after a NOV has been issued, procedures when a facility is found in compliance, and procedures when a facility is found to be out of compliance. The District is proposing to revise Policy #28 to include follow up guidelines such as procedures when a facility is found in compliance. The effect of these revisions would be to standardize follow-up guidelines. The District is proposing to implement these changes within one year from CARB approval of this Plan.

E-9. Annual Review and Prioritization of Enforcement

Under this measure, the District is proposing to perform an annual retrospective review of enforcement statistics in order to identify areas of improvements. This information would be shared with the public and used to establish enforcement priorities for the upcoming year, as well as inform training/educational priorities for both facilities and the community. The results of the review would be shared on or before April 1 each year through 2024.

E-10. Identification of CARB Enforcement Strategy Improvements

The District is proposing to work in conjunction with CARB to identify enforcement strategies within CARB's current regulatory programs that could benefit the Corridor.

5.3.1.2 CARB Enhanced Enforcement Measures

Over the last year, Steering Committee members predominantly expressed concerns regarding the following:

- Heavy duty vehicle routes
- Illegal idling
- Spatial gaps in the implementation of CARB programs

In addition, CARB acknowledges that compliance rates identified in the enforcement history may not necessarily reflect compliance across the community. In cases where enhanced enforcement activities uncover non-compliance issues, CARB's goal will be to achieve the same or higher compliance rates as observed in the three-year history. CARB staff will also work closely with the Steering Committee, the Imperial County Air Pollution Control District and other agencies as required to address gaps in the enforcement of mobile sources and seek opportunities to close these gaps (see Community Feedback, Appendix H).

CARB is committed to enhancing enforcement activities within the El Centro-Heber-Calexico Corridor by utilizing the following tools:

- An assessment of the enforcement history data
- Targeting areas that may require additional enforcement with guidance from the Steering Committee

CARB will utilize current regulations and enforcement programs to target areas of non-compliance within the El Centro-Heber-Calexico Corridor. CARB and Air District staff will use the above tools to focus on areas in and around the community where mobile sources can be targeted.

In response to comments received from community members regarding air quality concerns in the El Centro-Heber-Calexico Corridor, CARB proposes to implement the strategies discussed in this section to enforce and promote compliance from sources in the area.

Measures to Promote Compliance

CARB commits to the following measures to promote compliance in the El Centro-Heber-Calexico Corridor:

1. Increase frequency of CARB compliance inspections with guidance from the Steering Committee:

   CARB will collaborate with the Steering Committee co-chairs to work with the Steering Committee members to actively enhance CARB enforcement activities through a combination of improved complaint reporting, more focused inspections, and report-back meetings to update the Steering Committee on the status of CARB inspections and to obtain additional areas of mobile source concern. CARB will work with the co-chairs to meet annually with the Steering Committee in order to prioritize CARB enforcement strategies and identify possible locations where non-compliant vehicles are present. CARB will report back to the Community with the number of CARB inspections performed, mapped locations of the enforcement, and the number of citations and/or Notices of Violations issued.

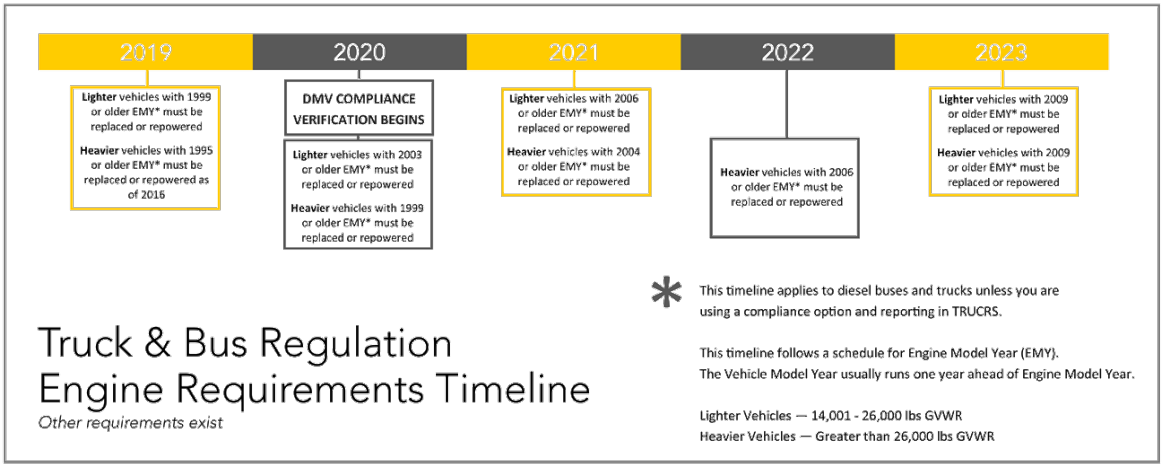
2. Coordinate and conduct inspections of stationary sources with ICAPCD staff when assistance is requested by the District:

   Based on Steering Committee input and upon evaluation of concerns, the District can request assistance from CARB and coordinate joint inspections of stationary sources, as needed.

3. Achieving Compliance with the Truck and Bus Regulation via Senate Bill 1:

   In April 2017, the Governor signed Senate Bill 1 (SB 1) into law, which included a provision that, beginning in 2020, a vehicle must demonstrate compliance with the STB regulation before it can be registered with the Department of Motor Vehicles (DMV). Beginning in 2020, the DMV, in conjunction with data provided by CARB, will deny vehicle registration to non-compliant HDVs based on the model year of the HDV.

   Truck and bus regulation engine requirements timeline:



4. Provide Annual Report of Enforcement Activities:

   The Community Outreach and Enforcement Section of CARB's Enforcement Division will provide an annual report to the Steering Committee to update and summarize CARB's enforcement activities within the community. Reporting enforcement activities results is expected to help create an enforcement presence and incentive compliance.

5. Coordination with other agencies:

   CARB will seek opportunities to coordinate with other agencies with enforcement authority in Imperial County. Such an opportunity could consist of CARB staff working with cities to provide truck idling signage.

6. Enhancing CARB's Data Management Practices:

   CARB is committed to enhancing the quality of enforcement data for the El Centro-Heber-Calexico Corridor. Moving forward, CARB will maintain the location of enforcement activity and received complaints to provide the Steering Committee with the most accurate data available. CARB has recently completed a visualization tool that makes CARB enforcement data more transparent and available. The tool can be accessed online by visiting https://webmaps.arb.ca.gov/edvs/.

7. Providing in-person community specific training (CARB may have future online trainings available). CARB commits to deliver one training session during the first year of implementation of this plan, and expand based on attendance and input from the community.

8. Commitment to Update Enforcement Strategies as Applicable:

   CARB staff are committed to updating enforcement strategies as requested by the Steering Committee, if said strategies are enforceable by CARB staff or if CARB can

reasonably accommodate the request (e.g., additional enforcement training for idling vehicles).

9. Compliance Communication:

   This strategy intends to promote voluntary compliance with applicable regulations and requirements, and to help overcome compliance barriers. Compliance will be promoted through educational programs and technical assistance. The information to communicate may include:

   - Education and technical assistance to the regulated community to facilitate compliance by providing information about regulatory requirements and how to meet them.
   - Available compliance training programs, hot lines, and publications.
   - Publicized success compliance stories in the area to create positive social climate and promote compliance.

10. Community outreach:

    Communicate specific effects of air pollution to human health and natural resources to build public support. This element of the strategy may include non-government organizations to help promote compliance by publicizing information to increase public awareness of environmental problems.

11. Complaint system:
    Citizen complaints are an important way of detecting violations that are unlikely to be detected through self-reporting or inspections. These types of complaints could potentially help detect violations and illegal acts that take place in isolated areas.

    CARB will promote the use of systems for reporting potential violations, referred to as “complaints.” Community will be provided with contacts and instructions to report potential violations.

12. Technology based and traditional enforcement inspection-based:

    CARB staff will inspect mobile and portable (i.e., PERP) air pollution sources and evaluate compliance against regulatory or permit requirements. Additionally, CARB will incorporate new technologies, where feasible, to assist and enhance enforcement work in communities.

13. CARB will present the SEP Program to the Steering Committee members to identify potential project opportunities that would benefit their community. If the project meets SEP Policy criteria, it may be listed as eligible for potential funding through the program.

6 Metrics to Track Progress

According to the CAPP Blueprint, a community emissions reduction program must include specific metrics that can be used to track progress in the selected community. These metrics are critical in helping a community understand whether their emissions reduction program is achieving its intended objectives.

The CAPP Blueprint specifies certain metrics as required. Specifically, a community emissions reduction program must identify and describe how progress on achieving emission reductions for specific categories of sources will be tracked on an annual basis. It must also track emissions for any pollutant that has an identified emissions reduction target. Sections 6.1 and 6.2 present the relevant metrics for the strategies proposed in this Plan.

6.1 ICAPCD Metrics

Table 6.1 presents the annual implementation metrics associated with the ICAPCD-led strategies in Chapter 4 of this Plan. The status of these and the District's air quality and exposure metrics (see Section 6.1.1) will be reported on in the District's annual progress report, which will be made available to the public no later than October 1 of every year following program implementation.

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency
R-1	• A description of the outcome of the District's control measure cost-effectiveness analysis. • A description of any proposed changes to Rule 400.2 or 400.4 resulting from the District's review, along with a schedule for those proposed changes.	ICAPCD
R-2	See Section 6.2.1	CARB
A-1	• The date the District began using the Technology Clearinghouse as a reference in developing BACT and T-BACT determinations for sources within or directly surrounding the Corridor. • The number and type of permit applications that underwent a BACT or T-BACT determination where the Technology Clearinghouse was used as a reference.	ICAPCD
E-1	• The date cameras were installed in the desert west of the Corridor. • The date the video feeds from these cameras were publicly available. • The reason(s) for any significant periods of downtime (i.e., >1 week) in the video feed. • A description of any exposure events identified as originating from the desert west of the Corridor and any resulting enforcement activity.	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency

E-2	• For each cross-agency training session provided:
	  ○ The date, topic, and number of attendees
	  ○ A summary of any action items, concerns, or solutions discussed
		ICAPCD

E-3	• For each industry training session and public workshop provided:
	  ○ The date, topic, and number of attendees
	  ○ A summary of any action items, concern, or solutions discussed
	  ○ A description of the outreach conducted
		ICAPCD

E-4	• The publication date for each quarterly newsletter and a summary of any enforcement- or rule-related discussion topics.	ICAPCD
E-5	• The date the outreach team was assembled and the current list of members. • The number of presentations or meetings with the Steering Committee. • A description of community concerns and associated responses/solutions.	ICAPCD & CARB
E-6	• The date website changes are implemented. • The date an online compliant form is created. • The number of complaints received through the online compliant form.	ICAPCD
E-7	• The date an updated Policy #17 is adopted and a summary of the revisions made.	ICAPCD
E-8	• The date an updated Policy #18 is adopted and a summary of the revisions made. • The date an updated Policy #28 is adopted and a summary of the revisions made.	ICAPCD
E-9	• The date the annual review of compliance and enforcement is released to the public. As part of this review, the District will track and report on: • The number of inspections conducted, including type, date, and location. • The number of NOVs and NTCs issued, including the date and regulation cited. • The number of complaints received, including type and resolution. • The number of NOVs and NTCs resolved.	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency
	• The non-compliance rate for the year.	
E-10	See Section 6.2.2	CARB & ICAPCD
I-1	• The number and type of wood burning devices replaced under the Woodsmoke Reduction Program, along with the replacement technology, and associated emission reductions. • The amount of incentive funds received under the Woodsmoke Reduction Program.	ICAPCD
I-2 L-3 M-2	• A description of any newly identified urban greening incentive programs applicable to the Corridor. • The number of applications submitted by the District or partner agencies and accepted. • The amount of incentive funds received from urban greening incentive programs. • The number and date of meetings held with local representatives from the planning departments and communities of El Centro, Heber, and Calexico to discuss potential locations for urban greening projects. • The number and type of urban greening projects implemented, along with a description of any nearby sources or sensitive receptors. • The amount of incentive funds and/or AB 617 funds used towards urban greening projects.	ICAPCD
L-1 M-3	• The number and date of meetings held with local public works departments and other representatives from the communities of El Centro, Heber, and Calexico to discuss potential locations for paving projects. • The number and location of paving projects implemented, along with an estimate of the total acres paved, associated emission reductions, and a description of any nearby sensitive receptors. • The amount of incentive funds and/or AB 617 funds used towards paving projects.	ICAPCD
L-2	• The number of general plan updates considered and commented on by the Steering Committee. • A description of any responses/actions by local agencies (in response to the comment letter(s) received).	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics

Strategy	Metric Description	Responsible Agency
L-4	• The number and date of meetings held with stakeholders to discuss the feasibility of implementing measures that reduce emissions in the open areas/desert areas west of the Corridor. • A description of the measures considered, along with a discussion of feasibility, proposed next steps, and metrics to track in the coming year.	ICAPCD
T-1	• The number and date of meetings held with local transportation agencies and other bodies to discuss the feasibility of implementing measures that reduce the impact of activities at the border. • A description of the measures considered, along with a discussion of feasibility, proposed next steps, and metrics to track in the coming year.	ICAPCD
T-2	• The date and number of attendees for each public workshop held related to signage initiatives for reducing idling. • A description of the measures considered, along with a discussion of feasibility, proposed next steps, and metrics to track in the coming year.	ICAPCD
T-3	• For each public workshop held for local businesses with heavy-duty truck fleets operating in the Corridor: o The date, topic, and number of attendees o A description of the outreach conducted	ICAPCD & CARB
M-1	• A description of each air filtration system installed in the Corridor, including the location, technology deployed, number of square feet conditioned, and number of sensitive receptors affected.	ICAPCD
M-4	• A list of schools in the Corridor implementing the school flag program, including identification of any schools that are new to the program. • A description of any enhancements made to the school flag program. • The amount of incentive funds and/or AB 617 funds used towards paving projects.	ICAPCD
M-5	• Number of acres burned per day under Policy #34 (including quantification of the number of acres characterized as “Special Burns”) and an estimate of emissions.	ICAPCD

Table 6.1. Summary of ICAPCD Annual Implementation Metrics		
Strategy	**Metric Description**	**Responsible Agency**
M-6	• The number of school buses replaced, along with the replacement technology (i.e., electric or compressed natural gas [CNG]), and associated emission reductions. • The amount of incentive funds and/or AB 617 funds used towards school bus replacement projects.	ICAPCD

6.1.1 Air Quality and Exposure Metrics

As described in the Community Air Monitoring Plan for the El Centro-Heber-Calexico Corridor, the District's regulatory monitors will be used to track the progress of this Plan. Specifically, at the end of each calendar year for the next five years, particulate matter data from the El Centro and Calexico regulatory monitors will be evaluated to identify potential correlations between actions taken as a part of this Plan and impacts to air pollutant levels (see Chapter 14 of the draft Community Air Monitoring Plan[100] for more information on the specific parameters that will be evaluated). Because the implementation of strategies will occur over a five-year period, it may take several years to see reductions in exposure that can be measured at the community scale. Therefore, the results of this analysis at the five-year milestone will be crucial to understanding air quality improvements within the Corridor.

6.2 CARB Metrics

6.2.1 Metrics Associated with Strategy R-2

Strategy R-2 involves the implementation of five proposed statewide regulations that are expected to result in emissions benefits within the Corridor. As part of this strategy, during the regulatory development phase, CARB proposes to update the Steering Committee biannually on the progress and milestones of the regulatory development process for each regulation. CARB also proposes to track the estimated emission reductions associated with each regulation and will report those to Steering Committee once the regulation has been adopted and after the first year of implementation.

6.2.2 Metrics Associated with Strategy E-10

Strategy E-10 involves the implementation of multiple measures intended to promote compliance in the El Centro-Heber-Calexico Corridor. To monitor the results and progress associated with these measures, CARB intends to track and report on the following metrics:

- Number of inspections conducted including type, date, and location.

[100] Available at: https://docs.wixstatic.com/ugd/99eb03_6d838992c80e4d8ab5d19723862c6424.pdf. Accessed: August 2019.

- Number of NOVs issued including date, recipient, and regulation cited.
- Complaint system responsiveness. This metric will include the number of complaints received by type, agency's response time, and their resolution.
- Timeliness of enforcement responses. This indicator will be used to measure the time it takes to respond to a violation and to achieve compliance.
- Progress in returning violators to compliance. Non-compliant sources will be tracked until full compliance is achieved, including number and type of violations, actions taken and results of those actions.
- Monetary penalties assessed. The total number and the value of penalties assessed as a result of enforcement actions will determine this indicator.
- Measures of technical assistance. This metric will measure the emphasis on compliance promotion, its extent and implementation effectiveness, including the number of facilities (i.e., sources) that received technical assistance and increased compliance achieved by facilities receiving technical assistance.

CARB's Community Outreach and Enforcement Section will include these metrics in an annual report to the Steering Committee that will update and summarize CARB's enforcement activities and their results within the Corridor.

7 California Environmental Quality Act Project Review

According to Section 15061 (b)(3) of the California Environmental Quality Act (CEQA) Guidelines, a project is exempt from CEQA if, "the activity is covered by the common sense rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." Since this Plan or "proposed Project" will result in an air quality benefit to the Community, this proposed Project is not expected to result in a significant impact under CEQA.

CEQA Guidelines §15308 provides a categorical exemption for "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." This proposed Project is an action taken by a regulatory agency, the ICAPCD, as authorized by state law for the protection and betterment of air quality in Imperial County. The ICAPCD determined that there is no substantial evidence indicating that any of the exceptions to the categorical exemptions apply to the proposed Project pursuant to CEQA Guidelines Section 15300.2 – Exemptions. Therefore, the proposed Project is exempt from CEQA.

Pursuant to Section 15062 of the CEQA Guidelines, the ICAPCD will file a Notice of Exemption upon Imperial County Air Pollution Control Board approval of the proposed Project.

8 Conclusion and Checklist

8.1 Checklist of Community Emissions Reduction Program Criteria and Conclusions

Table 8.1 presents a checklist outlining the recommended elements for a community emission reduction program under CARB's CAPP. As documented in Table 8.1, this Community Emission Reduction Program successfully addresses all applicable criteria.

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
Health-Based Air Quality Objectives	Provide a description of health-based objectives	Section 1.3.1
Community Steering Committee	Provide documentation on the community steering committee	Section 2.1; Appendix B
Public Process	Provide documentation the air district board held a public board hearing when presenting the final program for air district board consideration.	Pending; the Plan has been tentatively scheduled to go before the Air District Board on September 24, 2019.
	Provide documentation the air district provided materials in appropriate languages and interpretation services were available at workshops and public board hearings in accordance with the steering committee charter.	Section 2.2; Appendix C
	Provide documentation of a dedicated public webpage for each community emissions reduction program.	Section 2.2
	Provide documentation that outreach materials were distributed broadly to a variety of groups through various avenues such as the internet, paper mailings, and local print, radio, and television media as appropriate at least five days in advance of each meeting	Section 2.2; Appendix C
Outreach Summary	Provide a summary of the results of the first year of public outreach and an overview of the planned approach for public engagement moving forward.	Section 2.2; Appendix C; Appendix H
Community Profile	Provide a description of the community and include a discussion of community issues, including final geographic boundary, types of pollution impacting the community, a	Section 3.1

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
	characterization of current public health data, and socioeconomic factors.	
Technical Foundation	Provide an assessment and description of the existing high cumulative air quality exposure burden within the community.	Section 3.2.1
	Provide an assessment of sensitive receptor locations within the community and how land use issues impact exposure.	Section 3.2.5
	Provide a community-level emissions inventory based on best available data and developed in accordance with CARB's community inventory guidance.	Section 3.2.2
	Provide an assessment of the benefits of existing air quality policies and programs in reducing emissions within the community.	Section 3.2.4
	Provide an assessment of compliance with air quality rules and regulations for sources within the community, consistent with the enforcement plan.	Section 5.2; Appendix F
	Provide the source attribution analysis that assesses the share of mobile, stationary, and area-wide source emissions contributing to the air quality burden in the community, based on at least one of the source attribution approaches discussed in the online Resource Center.	Section 3.2.3
	Provide supporting documentation on methodologies and data sources used in the technical assessment.	Chapter 3
Emission Reduction Targets	Specify emissions reduction targets to be achieved within five years for directly-emitted applicable toxic air contaminants, $PM_{2.5}$, and any other identified pollutants (e.g., lead, PM_{10}) as defined in the technical assessment, designed to maximize toxic air contaminant emissions reductions and achieve healthful levels of $PM_{2.5}$.	Section 4.1

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
	For the mobile, stationary, and area-wide sources of applicable criteria air pollutants and toxic air contaminants impacting the community, specify: • Commitments to achieve numerical goals for compliance with air quality rules and regulations. • Commitments to achieve numerical goals for deploying or implementing available technologies or control techniques, with a focus on zero emission technologies where feasible	Sections 4.1 and 4.2
Proximity-Based Goals	Specify proximity-based goals to reduce exposure at sensitive receptors.	Section 4.3
Reduction Strategies	Establish reduction strategies, including: • Regulatory Strategies • Facility Risk Reduction Audits • Air Quality Permitting Strategies • Enforcement Strategies • Incentives-Based Strategies • Engagement Approaches • Land Use Strategies • Transportation Strategies • Mitigation Strategies	Section 4.4
Implementation Schedule	For each new strategy, specify a description of the strategy, the expected emissions and/or exposure reductions, cost effectiveness, timeline for implementation, a description of how the technical assessment informed strategy development, and perspectives of the community steering committee.	Section 4.4; Section 5.3.1; Appendix G; Appendix H
Enforcement Plan Requirements	Document a three-year enforcement history.	Section 5.2; Appendix F
	Specify compliance mechanisms that will be implemented.	Section 5.3.1
Required Metrics	Specify required annual metrics to track progress.	Chapter 6
Recommended Additional Metrics	Identify any additional metrics to track progress.	Chapter 6

Table 8.1. Community Emission Reduction Program Criteria

Topic	Description	Location in Document
CEQA	Include any applicable CEQA analysis	Chapter 7

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APPENDIX A
COMMUNITY STEERING COMMITTEE MEETING SUMMARY

Appendix A. Community Meeting Summary

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Meeting Date	Meeting Time	Meeting Location	Meeting Type	Number of Attendees	Outreach Mechanisms	Topics Discussed[1]	Next Steps
11/1/2018	10am-12pm	Enrique "Kiki" Camarena Library Calexico, CA	Informational Meeting	37	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Introduction to AB 617 - Community projects in progress - CSC application process	- Plan first CSC meeting - Develop bylaws
11/14/2018	5:30-7:30pm	Heber Community Center Heber, CA	Steering Committee Meeting (#1)	41	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CSC member roles - Bylaws overview - Brown Act 101 - CSC charter - AB 617 incentives	- Develop glossary of acronyms, terms, and bills - Review bylaws - Designate alternates for CSC - Develop presention on air monitoring
12/17/2018	5:30-7:30pm	Heber Community Center Heber, CA	Steering Committee Meeting (#2)	36	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Overview of AB 617 Blueprint - BARCT update - Incentive funding - IVAN air monitoring - Source attribution analyses	- Prepare presentations on State Implementation Plan, AQ-View, source attribution methods, components of pollution, and how monitoring works - Review bylaws
1/16/2019	5:30-7:30pm	Heber Community Center Heber, CA	Steering Committee Meeting (#3)	43	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Corridor stationary source list - Bylaw/Charter upate - Regulatory monitoring - Anthropogenic vs. non-anthropogenic sources - AQ-View - Ag burning in Imperial County	- Continue to develop glossary of terms, provide glossary in spanish - Discuss remaining planned topics at January 30th meeting.
1/30/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#4)	42	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Bylaw/Charter upate - First 5 elements of CAMP	- First 5 elements of CAMP - Review charter/bylaws - Control strategies
2/13/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#5)	49	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Revised CSC charter - First 5 elements of CAMP - Control strategies for CERP - Ag burning - Policy #34	- Discuss framework for handling budget, monitoring area, planning, and emisison reduction projects
3/14/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#6)	35	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Ag burning - Policy #34 - CAMP/CERP update. - Discussion and approval of the code of conduct. - Discussion and approval of the AB 617 Community boundary - CARB presentation: Community Outreach and Enforcement - New AB 617 website	- Emission inventory presentation - Pesticides presentation by DPR

Appendix A. Community Meeting Summary

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Meeting Date	Meeting Time	Meeting Location	Meeting Type	Number of Attendees	Outreach Mechanisms	Topics Discussed[1]	Next Steps
4/10/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#7)	37	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- AB 617 CAPP grant - CSC stipend - Mobile/Stationary source surveys - CARB Mobile Source Data Collection Program - IVAN reporting tool - Emission inventory data - Source attribution - Preliminary data education	- Pesticides presentation by DPR and Ag Commissioner - Proposal of emission reduction projects
5/8/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#8)	42	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CSC Stipend - Locations of CAMs - CAMP/CERP status update - Ag burning - Policy #34 - Pesticides	- Organize public workshops
5/22/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#9)	41	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CAMP status update - Locations of CAMs	- Review budget - Finalize locations of CAMs - Host public workshops
6/12/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#10)	49	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CAMP status update - Alternative low cost air quality sensors - Locations of CAMs	- Finalize locations of CAMs - Host public workshops
6/19/2019	2:00-4:00pm 5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Workshop (#1)	75	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CAMP background and status update - CAMP background and status update - Vote on locations of CAMs - Various booths hosted by CARB, CCV, ICAPCD, and Ramboll	N/A
7/10/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting	44	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CAMP status update - Dylos monitor training - Indoor air filtration at schools	- CSC to vote on CUSD Parking Lot Paving Project
7/24/2019	5:30-7:30pm	Heber Community Center Heber, CA	Steering Committee Meeting (#12)	29	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- Budget update - CAMP status update - CERP status update - Target selection for emissions reduction projects	- Review and provide comments on draft CAMP and CERP
8/14/2019	5:30-7:30pm	ECRMC Community Education Center El Centro, CA	Steering Committee Meeting (#13)	42	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CERP status update - Mitigation Projects Survey results discussion - Q&A on draft CAMP - Air Filtration Projects Survey	- CSC to vote on approval of the draft CAMP

Appendix A. Community Meeting Summary

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Meeting Date	Meeting Time	Meeting Location	Meeting Type	Number of Attendees	Outreach Mechanisms	Topics Discussed[1]	Next Steps
8/28/2019	5:30-7:30pm	Heber Community Center Heber, CA	Steering Committee Meeting (#14)	32	- Notice of meeting issued via internet and e-mail - Spanish interpretation available	- CERP status update - Air Filtration Projects Survey results discussion - Vote on approval of draft CAMP - Discuss tours of sources within Community	- CSC to vote on approval of the draft CERP

Notes:

[1] Meeting materials, including presentations, are available at: https://www.icab617community.org/. Accessed: August 2019.

Abbreviations:

AB - assembly bill
Ag - agriculture
AQ - air quality
BARCT - best available retrofit control technology
CA - California
CAM - community air monitor
CAMP - community air monitoring plan
CAPP - Community Air Protection Program
CARB - California Air Resources Board
CERP - community emissions reduction program
CSC - Community Steering Committee
CUSD - Calexico Unified School District
DPR - Department of Pesticide Regulation
ECRMC - El Centro Regional Medical Center
IVAN - Identifying Violations Affecting Neighborhoods

APPENDIX B
AB617 COMMUNITY STEERING COMMITTEE CHARTER

AB 617 Community Steering Committee Charter

ARTICLE I. AUTHORITY.

This Charter is adopted by Board of the Imperial County Air Pollution Control District, (Imperial County Board of Supervisors convenes as "District Board") hereinafter referred to as "District Board," for the AB 617 Community Steering Committee, hereinafter referred to as the "Committee," to establish rules, policies, and procedures for its proceedings. In coordination with the Imperial County Air Pollution Control District, hereinafter referred to as "District," and local environmental justice organization Comité Civico del Valle, Inc., hereinafter referred to as "CCV," the Committee was established by the District Board pursuant to Resolution No._____, under the statutory authority of California Assembly Bill 617, hereinafter referred to as "AB 617." AB 617 is designed to implement a strategy to reduce emissions of toxic air contaminants and criteria pollutants in environmental justice communities affected by a high cumulative exposure burden, and provide education to these communities to increase awareness on air quality matters, which will lead to positive behavioral change that improves air quality.

Notwithstanding the partnership between the District and CCV, the District is the responsible agency for administering AB 617 activities, including but not limited to the implementation of the Community Emissions Reduction Program and Community Air Monitoring Plan, hereinafter referred to as "Program(s)." As such, final decision-making authority regarding AB 617 activities shall reside with the District's Air Pollution Control Officer and/or the District Board, as required by law.

ARTICLE II. PURPOSE.

The purpose of the Committee is to support active community involvement and collaboration in the development of the Program(s) by providing a forum for identifying community issues and potential solutions with all relevant parties. The Committee is to also support the development of a Community Emissions Reduction Program and Community Air Monitoring Plan, to help establish new Program(s) and/or expand upon any existing Program(s).

The Committee shall be responsible for discussing and providing recommendations to the District Board regarding the development and implementation of the Program(s), including but not limited to:

1. Determination of the final boundaries of the community to be served under the Program(s);

2. Community profile and technical assessment;

3. Approaches for community engagement and outreach;

4. Mechanisms for engaging with other agencies;

5. Issues and sources contributing to the community's air pollution challenges;

6. Responsibility/authority of government agencies, non-profit entities, and other community members to address air pollution challenges;

7. Strategies for developing/implementing the Program(s);

8. Program(s) targets and strategies;

9. Program(s) Enforcement; and

10. Metrics to track Program(s) progress.

ARTICLE III. COMMITTEE MEMBERS.

3.1. Number and Appointment. The Committee shall consist of fifteen (15) voting members appointed by the District Board. Thirteen (13) members shall be appointed in accordance with the appointment and application process discussed below. Two (2) members, including the District's Air Pollution Control Officer and the CCV Executive Director (or their respective designees), shall serve as *ex officio* members.

3.2. Qualifications. Each member of the Committee shall either reside, work, or own businesses within the community corridor (Calexico-Heber-El Centro), as defined by the Community Air Protection (CAP) Program(s) and CAP Blueprint. Additionally, each member shall meet the qualifications of his or her position as set forth in Section 3.3 below.

3.3 Composition. The fifteen (15) voting members shall include:

1. One (1) the District's Air Pollution Control Officer, or his/her designee, *ex officio*;

2. One (1) Executive Director of CCV, or his/her designee, *ex officio*; and

3. Thirteen (13) members including individuals, community-based organizations, affected sources and local government bodies in the affected community (Calexico-Heber-El Centro) pursuant to AB 617.

3.4. Alternates. Each Committee member specified in Section 3.3 may designate one (1) alternate from the pool of submitted applications, subject to approval by the District Board.

3.5. Committee Appointment and Application Process. The District Board shall appoint Committee members in the following manner:

1. The positions of Air Pollution Control Officer and CCV Executive Director are *ex officio* members and shall serve as Co-Chairpersons in accordance with Article IV of this Charter.

2. The remaining positions shall be appointed in compliance with a standardized application process including but not limited to submitting an application form to the District including information (as necessary) to demonstrate the applicant's interest in the community corridor pursuant to AB 617.

3. Applications for the appointment of Committee members shall be assembled by the Clerk of the Committee.

4. Persons applying in accordance with the above-mentioned process shall be recommended by the Co-Chairpersons and appointed by a majority of the District Board in accordance with all applicable laws. In the event a consensus cannot be reached among the Co-Chairpersons, all applications shall be submitted to the District Board for consideration. Committee members serve at the pleasure of the District Board, and may be removed from office by a majority vote of the District Board.

3.6. Term of Appointment. The term of appointment for *ex officio* members shall be coterminous with his or her qualifying position. All other Committee members shall be appointed for a term of two (2) years. Once the initial term is fulfilled, the non- *ex officio* Committee members shall make a succeeding application for a full two (2) year term in accordance with the above-mentioned application process. At the conclusion of any term, a Committee member may be reappointed by the District Board to a subsequent two (2) year term.

3.7. Resignation. A Committee member may resign effective on giving written notice to the Clerk of the Committee and the Co-Chairpersons, unless the notice specifies a later date for his/her resignation to become effective. The Clerk of the Committee shall enter the notice in the proceedings of the Committee. The acceptance of a resignation shall not be necessary to make it effective.

3.8 Vacancies. Vacancies occurring on the Committee shall be automatically filled by the respective designated Alternate. In the case of the vacancy of an Alternate, the District Board shall appoint a replacement from the pool of submitted applications.

ARTICLE IV. OFFICERS AND ADVISORS.

4.1. Designation of Officers. Officers of the Committee shall be as follows:

1. The two *ex officio* members shall serve as Co-Chairpersons of the Committee and preside over all Committee meetings, rotating as presiding Chairperson every other meeting. If the Co-Chairperson scheduled to preside over a Committee meeting is absent, the absent Co-Chairperson's designated alternate will preside over Committee meeting. If the Co-Chairperson and their designated alternate are both absent, the other Co-Chairperson, or their designated alternate, shall preside over the Committee meeting. If both Co-Chairpersons are absent, the Committee members present will select one Committee member to act as temporary Chairperson to conduct the meeting.

2. A Clerk of the Committee shall attend all the Committee meetings, develop meeting agendas, keep the minutes, witness signatures on all documents executed on behalf of Committee, give notice of all meetings of the Committee, as required by law, and have other duties as resolved by the Committee. The Clerk of the Committee shall not be a member of the Committee and shall be appointed by the District. An Assistant Clerk shall perform the duties of the Clerk in the Clerk's absence. The Assistant Clerk shall not be a member of the Committee and shall be appointed by the District.

4.2 Resignation. A Co-Chairperson may resign effective on giving written notice to the Clerk of the Committee, unless the notice specifies a later date for his/her resignation to become effective. Upon receipt of such notice, the Clerk shall notify the other Co-Chairperson, and shall enter the notice in the proceedings of the Committee. The acceptance of a resignation shall not be necessary to make it effective.

4.3 Designation of Advisors. Advisors to the Committee shall include, but not be limited to:

1. Consultants. The Committee may request the services of consultants, advisors, and independent contractors as are deemed necessary and desirable in implementing and carrying out the purposes of the Committee. Such requests shall be granted at the discretion of the District Board and shall be subject to available funding.

2. General Counsel to the Committee. The Office of County Counsel of Imperial County shall serve as counsel to the Committee.

ARTICLE V. MEETINGS.

5.1. Regular and Special Meetings. The Committee shall establish the time and place for its regular meetings. The date, hour, and location of regular meetings shall be fixed by resolution of the Committee. The Committee shall hold at least one regular meeting each month of every calendar year. In the event of a lack of agenda topics, pending technical analysis, or any other reason; the Committee shall hold a vote to determine if the following scheduled monthly meeting is canceled. Special meetings and adjourned meetings may be held as required or permitted by law.

5.2. Notice. All meetings of the Committee, including, without limitation, regular, special and adjourned meetings, shall be called, noticed, held and conducted in accordance with the provisions of the Ralph M. Brown Act (commencing with Section 54950 of the California Government Code).

5.3. Attendance and Participation. Committee members are expected to attend each Committee meeting in person. When a member has failed to attend three (3) consecutive meetings in person (without a leave of absence) or half the meetings in any twelve (12) month period, the Co-Chairpersons shall be notified. The Co-Chairpersons and Committee members shall discuss the absences, the reason(s) for the absences, and the impact of the absences

on the Committee. Corrective action, if necessary, will be determined on a case-by-case basis by the Committee.

A Committee member may request a leave of absence. A request for a leave of absence shall be made in writing to the Committee Co-Chairpersons at any point during a Committee member's term for reasons of health, work, or other temporary circumstance. The decision to approve the leave of absence rests with the Co-Chairpersons. In the event a consensus cannot be reached between the Co-Chairpersons, the District Board shall make the final decision. A leave of absence shall not exceed three (3) months.

5.4. Quorum. A majority of current members of the Committee not on a leave of absence shall constitute a quorum. Vacant seats shall not count as "current members." Each member of the Committee, including the two *ex officio* members, shall be entitled to one (1) vote. A vote of the majority of the members present with at least a quorum in attendance shall be required to take action, and/or make a recommendation, except for adjournment of a meeting which shall require only a majority of those present, and as provided in Section 5.8. No proxy or absentee voting shall be permitted.

5.5. Special Meeting. Notice of any special meeting shall be made in compliance with the Ralph M. Brown Act (commencing with Section 54950 of the California Government Code).

5.6. Conduct of Business.

1. Items on the agenda will be considered in order unless the presiding Chairperson announces a change in the order of consideration.

2. Unless an agenda item identifies a particular source for a report, such as the Co-Chairpersons or Committee members, the Committee members and/or its advisors shall first report on the item. The item will then be open to public comment upon recognition of the speaker by the presiding Chairperson.

3. Confidential information shall not be subject to disclosure at meetings of the Committee.

5.7. Resolutions and Motions. All official acts of the Committee shall be taken either by resolution or a motion, duly made, seconded and adopted by a vote of the Committee members. Any Committee member, including the Co-Chairpersons, may make motions and seconds.

5.8. Voting. All actions of the Committee shall be adopted by an affirmative vote of a majority of the Committee members present and eligible to vote, provided that at least a quorum of Committee members are present and eligible to vote. Any act of the Committee shall be accomplished by a roll call vote when such a vote is requested by any member in attendance.

5.9. Motions to Reconsider. A motion to reconsider the vote on an agenda item may not be made at the meeting at which the item was acted upon. Such motions may be made at the subsequent Committee meeting, if the agenda item was not a hearing required by law, and the Committee member making the motion voted on the prevailing side of the agenda item sought to be reconsidered. If the item was a hearing required by law, a motion to reconsider may not be made.

5.10. Disqualification from Voting. A Committee member shall be disqualified from voting on any contract or any other matter in which he/she has a financial interest, as required by law.

5.11. Minutes. The Clerk of the Committee shall prepare the minutes of each meeting of the Committee. The minutes shall be an accurate summary of the Committee's consideration of each item on the agenda, and an accurate record of each action taken by the Committee. At a subsequent meeting, the Clerk shall submit the minutes to the Committee for approval by a majority vote of the Committee members in attendance at the meeting covered by the minutes. Once approved, the Clerk will sign the minutes and keep them with the proceedings of the Committee. The official Minutes, as approved by the Committee, recording any motions or actions taken by the Committee, shall be prepared and submitted to the Clerk of District Board.

5.12. Public Records. All records of the Committee shall be kept and provided to the public in accordance with the provisions of the California Public Records Act (commencing with Section 6250 of the California Government Code).

5.13. Adjournment. The Committee may adjourn any meeting to a time and place specified in the resolution or motion of adjournment, notwithstanding less than a quorum may be present and voting. If no members of the Committee are present at regular or adjourned meeting, the Clerk may declare the meeting adjourned to a stated time and place and shall cause written notice to be given in the same manner as provided for special meetings, unless such notice is waived as provided in Section 5.2 of these Bylaws for special meetings. A copy of the order or notice of adjournment shall be posted as required by applicable law.

5.14. Reports. On or before January 31st of each year, the Committee shall submit an annual report to the District Board. A draft of the report shall be provided to and approved by the Committee before its submission to the District Board. The report shall highlight the activities, accomplishments, and future goals of the Committee.

5.15. Progress Reports. The District Board may request the Committee to submit progress reports and recommendations at any time. The Committee shall respond to such requests within a reasonable period of time. Progress reports and recommendations shall be provided to and approved by the Committee before its submission to the District Board.

5.16. Communications with the Public. Public participation in Committee meetings shall be allowed as follows:

1. An opportunity for members of the public to directly address the Committee on any item on the agenda of interest to the public shall be provided before or during the Committee's consideration of the item.

2. The agenda will provide for public comment on items not on the agenda which are within the subject matter jurisdiction of the Committee at the beginning of each regular meeting agenda. The total time for public comment on matters not on the agenda shall not exceed fifteen (15) minutes, and each speaker is limited to a maximum of three (3) minutes.

3. The presiding Chairperson of the Committee may establish reasonable limits on the amount of time allotted to each speaker on an item, and the Committee may establish reasonable limits on the total amount of time allotted for public testimony on an item. When further discussion is required, the Committee may vote to allow time in the agenda of the following meeting.

5.17. Robert's Rules of Order. To the extent that conduct of the meetings is not governed by this Charter or the Ralph M. Brown Act, the current edition of Robert's Rules of Order shall apply.

5.18 Stipend. Each Committee member, with the exception of the Air Pollution Control Officer or his/her alternate, shall receive a stipend of seventy-five dollars ($75) per Committee meeting attended (excluding any subcommittee meetings), subject to the availability of AB 617 funding. A Committee member shall not be entitled to a stipend if he or she is more than thirty (30) minutes late to a Committee meeting, or leaves more than thirty (30) minutes early.

ARTICLE VI. SUBCOMMITTEES.

6.1. Appointment. The Co-Chairpersons of the Committee may establish such ad-hoc advisory subcommittees ("Subcommittees") as they deem necessary. Such Subcommittees must be composed of less than a quorum of voting Committee members. The Co-Chairpersons of the Committee may designate one (1) or more alternates for the Subcommittees to serve during any absences.

6.2. Authority. All Subcommittees are advisory only, and may be dissolved at any time upon a majority vote of the Committee.

6.3. Meetings. Meetings of Subcommittees shall be held at times and places determined by resolution of the Committee. A majority of those Committee members assigned to a Subcommittee shall constitute a quorum.

ARTICLE VII. AMENDMENT OF CHARTER.

This Charter may be amended only by an approved motion or resolution of both of the Committee and the District Board after properly noticed meetings. This Charter shall be reviewed on at least an annual basis.

March 12, 2019

APPENDIX C
COMMUNITY STEERING COMMITTEE MEETING MATERIALS (ELECTRONIC*)

* Materials are available for download at: http://www.icab617community.org/

APPENDIX D
COMMUNITY-LEVEL EMISSIONS INVENTORY SUPPLEMENTARY DATA

Table D.1. Forecasted Criteria Emissions Inventory

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	NOX (tons/year)			TOG (tons/year)			ROG (tons/year)			SOX (tons/year)			PM10 (tons/year)			PM25 (tons/year)		
Source Category	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**
Stationary Sources	**189.76**	**192.68**	**189.20**	**915.95**	**928.60**	**944.71**	**255.39**	**262.74**	**276.21**	**8.10**	**8.21**	**8.20**	**119.11**	**122.44**	**123.65**	**48.99**	**52.32**	**53.53**
CLEANING AND SURFACE COATINGS	0.00	0.00	0.00	109.23	124.57	142.99	98.71	112.72	129.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ADHESIVES AND SEALANTS	0.00	0.00	0.00	17.39	19.56	22.63	15.50	17.43	20.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
COATINGS AND RELATED PROCESS SOLVENT	0.00	0.00	0.00	25.71	30.57	34.73	25.11	29.87	33.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DEGREASING	0.00	0.00	0.00	61.81	69.52	80.45	53.80	60.50	70.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
LAUNDERING	0.00	0.00	0.00	4.31	4.93	5.18	4.31	4.93	5.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FUEL COMBUSTION	162.31	165.23	161.75	29.68	32.37	32.45	4.93	5.29	5.25	3.11	3.22	3.21	16.50	16.67	16.59	16.47	16.64	16.56
ELECTRIC UTILITIES	82.55	82.84	82.87	25.45	28.03	28.25	3.04	3.34	3.37	1.57	1.66	1.67	14.45	14.56	14.57	14.42	14.53	14.54
MANUFACTURING AND INDUSTRIAL	79.62	82.25	78.74	3.72	3.83	3.68	1.81	1.86	1.79	1.54	1.55	1.53	2.01	2.08	1.99	2.00	2.07	1.98
PETROLEUM REFINING (COMBUSTION)	0.00	0.00	0.00	0.05	0.05	0.05	0.04	0.04	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SERVICE AND COMMERCIAL	0.14	0.14	0.14	0.47	0.47	0.47	0.04	0.04	0.04	0.01	0.01	0.01	0.04	0.04	0.04	0.04	0.04	0.04
INDUSTRIAL PROCESSES	3.74	3.74	3.74	2.96	2.96	2.96	2.35	2.35	2.35	0.02	0.02	0.02	17.40	17.40	17.40	1.34	1.34	1.34
FOOD AND AGRICULTURE	0.66	0.66	0.66	1.94	1.94	1.94	1.36	1.36	1.36	0.00	0.00	0.00	13.39	13.39	13.39	0.53	0.53	0.53
MINERAL PROCESSES	3.09	3.09	3.09	1.02	1.02	1.02	1.00	1.00	1.00	0.02	0.02	0.02	4.01	4.01	4.01	0.81	0.81	0.81
MISCELLANEOUS PROCESSES	0.00	0.00	0.00	675.21	676.70	677.31	56.82	57.34	57.55	0.00	0.00	0.00	82.97	86.13	87.42	28.95	32.11	33.40
COOKING	0.00	0.00	0.00	10.37	11.85	12.46	3.63	4.15	4.36	0.00	0.00	0.00	21.99	25.15	26.44	21.99	25.15	26.44
FARMING OPERATIONS	0.00	0.00	0.00	664.84	664.84	664.84	53.19	53.19	53.19	0.00	0.00	0.00	60.98	60.98	60.98	6.96	6.96	6.96
PETROLEUM PRODUCTION AND MARKETING	0.04	0.04	0.04	74.31	64.34	60.07	74.31	64.34	60.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PETROLEUM MARKETING	0.04	0.04	0.04	74.31	64.34	60.07	74.31	64.34	60.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SOLVENT EVAPORATION	0.00	0.00	0.00	23.39	26.49	27.75	18.01	20.43	21.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CONSUMER PRODUCTS	0.00	0.00	0.00	23.39	26.49	27.75	18.01	20.43	21.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WASTE DISPOSAL	23.66	23.66	23.66	1.18	1.18	1.18	0.26	0.26	0.26	4.97	4.97	4.97	2.24	2.24	2.24	2.23	2.23	2.23
INCINERATORS	23.66	23.66	23.66	1.09	1.09	1.09	0.18	0.18	0.18	4.97	4.97	4.97	2.19	2.19	2.19	2.19	2.19	2.19
OTHER (WASTE DISPOSAL)	0.00	0.00	0.00	0.09	0.09	0.09	0.08	0.08	0.08	0.00	0.00	0.00	0.05	0.05	0.05	0.05	0.05	0.05
SEWAGE TREATMENT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CONSUMER PRODUCTS	0.20	0.20	0.20	22.07	24.94	27.98	17.23	19.36	21.29	0.46	0.47	0.45	2.01	2.08	1.99	2.00	2.07	1.98
PESTICIDES/FERTILIZERS	0.00	0.00	0.00	1.12	1.28	1.35	1.06	1.21	1.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WASTE DISPOSAL	0.05	0.05	0.05	0.00	0.00	0.00	0.16	0.16	0.16	0.03	0.03	0.03	0.03	0.03	0.03	0.00	0.00	0.00
INCINERATORS	0.04	0.04	0.04	0.00	0.00	0.00	0.16	0.16	0.16	0.03	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00
OTHER (WASTE DISPOSAL)	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SEWAGE TREATMENT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.03	0.03	0.00	0.00	0.00

Table D.1. Forecasted Criteria Emissions Inventory

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	NOX (tons/year)			TOG (tons/year)			ROG (tons/year)			SOX (tons/year)			PM10 (tons/year)			PM25 (tons/year)		
Source Category	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**
Area-wide Sources	**160.58**	**169.19**	**166.94**	**511.13**	**559.73**	**579.57**	**339.27**	**383.97**	**402.49**	**1.68**	**1.73**	**1.73**	**1909.00**	**1943.05**	**1969.23**	**271.10**	**275.06**	**277.36**
FUEL COMBUSTION	142.86	151.61	149.49	11.45	12.14	11.95	5.08	5.36	5.28	0.64	0.66	0.66	14.11	14.98	14.79	14.08	14.95	14.75
SERVICE AND COMMERCIAL	142.23	151.18	149.16	11.37	12.08	11.91	5.00	5.31	5.24	0.64	0.66	0.66	14.08	14.96	14.77	14.05	14.93	14.74
FOOD AND AGRICULTURAL PROCESSING	0.63	0.43	0.33	0.09	0.05	0.04	0.08	0.05	0.03	0.00	0.00	0.00	0.03	0.02	0.01	0.03	0.02	0.01
INDUSTRIAL PROCESSES	0.01	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.44	2.69	2.89	0.70	0.77	0.82
FOOD AND AGRICULTURE	0.01	0.01	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.44	2.69	2.89	0.70	0.77	0.82
MISCELLANEOUS PROCESSES	17.71	17.56	17.44	161.93	161.36	161.08	26.58	26.11	25.84	1.04	1.06	1.06	1892.44	1925.38	1951.56	256.32	259.35	261.79
FARMING OPERATIONS	0.00	0.00	0.00	138.84	138.84	138.84	11.11	11.10	11.10	0.00	0.00	0.00	59.36	56.57	55.22	9.67	9.25	9.05
FIRES	0.11	0.11	0.11	0.42	0.42	0.42	0.36	0.36	0.36	0.00	0.00	0.00	0.39	0.39	0.39	0.36	0.36	0.36
MANAGED BURNING AND DISPOSAL	3.53	3.36	3.27	11.45	10.90	10.62	10.01	9.54	9.29	0.62	0.59	0.57	10.46	9.96	9.70	9.97	9.50	9.25
RESIDENTIAL FUEL COMBUSTION	14.07	14.09	14.06	11.22	11.19	11.20	5.10	5.11	5.09	0.42	0.47	0.49	5.76	5.77	5.76	5.58	5.60	5.58
CONSTRUCTION AND DEMOLITION	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	211.34	250.83	276.25	21.12	25.06	27.61
PAVED ROAD DUST	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	42.35	49.09	52.08	6.35	7.36	7.81
UNPAVED ROAD DUST	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	288.75	279.18	278.92	28.86	27.90	27.88
FUGITIVE WINDBLOWN DUST	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1274.04	1273.58	1273.25	174.39	174.31	174.26
OTHER (MISCELLANEOUS PROCESSES)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SOLVENT EVAPORATION	0.00	0.00	0.00	337.75	386.24	406.54	307.62	352.50	371.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ARCHITECTURAL COATINGS AND RELATED PI	0.00	0.00	0.00	91.02	109.35	117.33	88.95	107.02	114.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ASPHALT PAVING / ROOFING	0.00	0.00	0.00	2.99	3.55	3.91	2.99	3.55	3.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CONSUMER PRODUCTS	0.00	0.00	0.00	229.24	259.49	271.79	201.17	228.09	239.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PESTICIDES/FERTILIZERS	0.00	0.00	0.00	14.51	13.84	13.51	14.51	13.84	13.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Table D.1. Forecasted Criteria Emissions Inventory

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	NOX (tons/year)			TOG (tons/year)			ROG (tons/year)			SOX (tons/year)			PM10 (tons/year)			PM25 (tons/year)		
Source Category	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**	**2017**	**2024**	**2029**
On-Road Mobile Sources	**277.44**	**136.42**	**117.28**	**166.35**	**108.59**	**93.37**	**153.38**	**102.12**	**88.45**	**2.20**	**1.94**	**1.82**	**30.33**	**29.53**	**31.63**	**14.44**	**12.48**	**13.22**
On-Road	277.44	136.42	117.28	166.35	108.59	93.37	153.38	102.12	88.45	2.20	1.94	1.82	30.33	29.53	31.63	14.44	12.48	13.22
BUS	18.04	10.95	9.07	1.68	0.99	0.87	1.42	0.86	0.76	0.06	0.06	0.06	1.47	1.35	1.42	0.78	0.61	0.64
HHDV	108.22	58.84	59.45	4.73	1.87	2.02	4.15	1.62	1.74	0.29	0.28	0.26	4.18	2.62	2.80	2.81	1.23	1.29
LDV	107.19	47.79	34.12	152.81	101.35	86.59	141.17	95.45	82.21	1.73	1.50	1.38	22.28	23.81	25.54	9.37	9.86	10.47
LHDV	18.42	10.85	6.75	4.37	3.54	3.14	4.15	3.41	3.05	0.05	0.05	0.05	0.75	0.78	0.82	0.36	0.36	0.37
MHDV	25.56	7.99	7.89	2.76	0.83	0.74	2.48	0.77	0.69	0.07	0.06	0.07	1.65	0.96	1.04	1.12	0.42	0.46

Off-Road Mobile Sources	**244.63**	**163.31**	**144.46**	**158.00**	**139.03**	**134.13**	**151.98**	**133.94**	**129.19**	**3.05**	**3.05**	**3.07**	**13.79**	**9.58**	**8.02**	**13.01**	**9.10**	**7.69**
OTHER MOBILE SOURCES	244.63	163.31	144.46	158.00	139.03	134.13	151.98	133.94	129.19	3.05	3.05	3.07	13.79	9.58	8.02	13.01	9.10	7.69
AIRCRAFT	23.54	23.54	23.53	17.63	17.61	17.60	17.62	17.60	17.59	2.73	2.72	2.72	3.44	3.44	3.44	3.41	3.41	3.41
FARM EQUIPMENT	14.58	9.56	6.92	2.97	2.12	1.73	2.60	1.84	1.51	0.00	0.00	0.00	0.86	0.59	0.43	0.79	0.54	0.40
FUEL STORAGE AND HANDLING	0.00	0.00	0.00	12.94	11.00	10.39	12.94	10.99	10.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OFF-ROAD EQUIPMENT	206.25	129.91	113.68	70.56	64.35	66.74	65.70	60.22	62.67	0.32	0.32	0.35	9.45	5.51	4.11	8.77	5.12	3.85
OFF-ROAD RECREATIONAL VEHICLES	0.20	0.24	0.26	36.78	30.07	25.55	36.72	30.00	25.48	0.00	0.00	0.00	0.03	0.03	0.04	0.03	0.03	0.03
RECREATIONAL BOATS	0.00	0.00	0.00	17.12	13.89	12.13	16.40	13.28	11.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TRAINS	0.06	0.06	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

NOx: Nitrogen Oxides
TOG: Total Organic Gases
ROG: Reactive Organic Gases
SOx: Sulfur Oxides
PM10: Particulate Matter 10 Microns or Smaller
PM2.5: Particulate Matter 2.5 Microns or Smaller

BUS: BUS
HHDV: Heavy Heavy Duty Vehicle
LDV: Light Duty Vehicle
LHDV: Light Heavy Duty Vehicle
MHDV: Medium Heavy Duty Vehicle

Table D.2. Forecasted Toxic Air Contaminant Emissions Inventory
Imperial County Year 1 Community Emission Reduction Program Plan for the El Centro-Heber-Calexico Corridor

Stationary Source Toxic Air Contaminant (TAC)	Mass Emissions (lb/year)		
	2017	2024	2029
Diesel PM	282.27	282.27	282.27
Nickel	287.10	287.34	287.37
Benzene	1,807.05	1,755.82	1,707.30
Arsenic	4.86	4.87	4.87
1,3-Butadiene	77.44	88.33	92.78

Area wide Source Toxic Air Contaminant (TAC)	Mass Emissions (lb/year)		
	2017	2024	2029
Cadmium	145.24	147.97	150.00
Arsenic	103.09	105.50	107.30
Nickel	383.12	391.63	397.37
p-Dichlorobenzene	5,052.63	5,792.58	6,086.65
Lead	4,113.33	4,201.99	4,260.89

Off-Road Source Toxic Air Contaminant (TAC)	Mass Emissions (lb/year)		
	2017	2024	2029
Diesel PM	16,444.85	8,224.66	4,986.81
1,3-Butadiene	1,167.51	1,174.90	1,209.42
Benzene	4,517.05	4,234.00	4,281.64
Formaldehyde	12,700.88	11,125.58	11,032.46
Acetaldehyde	5,380.59	4,575.45	4,505.47

On-Road Source Toxic Air Contaminant (TAC)	Mass Emissions (lb/year)		
	2017	2024	2029
1,3-Butadiene	794.13	421.48	332.24
Benzene	7,535.90	4,496.94	3,725.20
Diesel PM	6,874.10	1,412.64	1,325.69
Formaldehyde	4,811.97	2,150.24	1,835.85
Naphthalene	283.78	138.84	104.45

Notes:

[1] Top 5 TACs are based off of Toxicity Weighted Emissions (TWEs). TWEs are adjusted emissions that consider the risk posed by the toxic pollutant. These are still emissions and not risk. They are calculated by multiplying mass emissions by a toxicity factor (e.g., cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

Table D.3-1. 2017 Stationary Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Diesel PM	282.27	652.05	0.97	0.00
Nickel	287.10	574.78	351.16	245.81
Benzene	1,807.05	403.51	10.31	11.46
Arsenic	4.86	123.50	5.55	4.16
1,3-Butadiene	77.44	101.37	0.66	0.02
Formaldehyde	1,665.43	76.94	3.17	5.19
Cadmium	1.76	56.77	1.50	0.00
Methylene chloride {Dichloromethane}	2,768.38	21.32	0.12	0.03
Perchloroethylene {Tetrachloroethene}	411.45	19.33	0.20	0.00
Acetaldehyde	851.81	17.71	0.10	0.31
Ethyl benzene	673.52	12.97	0.01	0.00
Naphthalene	43.58	11.41	0.08	0.00
Lead	22.18	2.05	0.00	0.00
Trichloroethylene	6.53	0.10	0.00	0.00
Ethylene oxide	0.00	0.00	0.00	0.00
Isopropyl alcohol	30,604.62	0.00	0.07	1.64
Toluene	23,335.40	0.00	1.33	0.11
Methyl chloroform {1,1,1-Trichloroethane}	8,486.03	0.00	0.15	0.02
Methyl ethyl ketone {2-Butanone}	6,481.60	0.00	0.00	0.09
Xylenes (mixed)	6,432.12	0.00	0.16	0.05
Aluminum	4,766.78	0.00	0.00	0.00
Hexane	4,080.03	0.00	0.01	0.00
Methanol	4,041.53	0.00	0.02	0.02
Ethylene glycol monobutyl ether	3,589.62	0.00	0.75	0.13
2,2,4-Trimethylpentane	2,779.04	0.00	0.00	0.00
o-Xylene	2,684.94	0.00	0.07	0.02
n-Butyl alcohol	2,156.51	0.00	0.00	0.00
Phosphorus	1,926.38	0.00	0.00	0.00
Ethylene	1,547.34	0.00	0.00	0.00
Chlorine	1,488.45	0.00	127.44	1.21

Table D.3-1. 2017 Stationary Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Cyclohexane	1,435.10	0.00	0.00	0.00
Chlorinated Fluorocarbon {CFC-113} {1,1,2-Trichloro-1,2,2-trifluoroethane}	1,119.30	0.00	0.00	0.00
m-Xylene	980.48	0.00	0.02	0.01
Methyl isobutyl ketone {Hexone}	845.43	0.00	0.00	0.00
p-Xylene	506.80	0.00	0.01	0.00
Sulfuric acid	440.45	0.00	7.54	0.63
1,2,4-Trimethylbenzene	422.97	0.00	0.00	0.00
Diethylene glycol monobutyl ether	403.74	0.00	0.00	0.00
Zinc	387.23	0.00	0.00	0.00
Propionaldehyde	372.23	0.00	0.00	0.00
Crotonaldehyde	357.41	0.00	0.00	0.00
Propylene	262.90	0.00	0.00	0.00
Manganese	184.57	0.00	35.12	0.00
sec-Butyl alcohol	184.50	0.00	0.00	0.00
Copper	133.30	0.00	0.00	0.23
Barium	120.92	0.00	0.00	0.00
Ethylene glycol	89.68	0.00	0.00	0.00
Propylene glycol monomethyl ether	73.89	0.00	0.00	0.00
Propylene glycol monomethyl ether acetate	70.35	0.00	0.00	0.00
Ethyl chloride {Chloroethane}	65.07	0.00	0.00	0.00
Methyl chloride {Chloromethane}	54.41	0.00	0.00	0.00
Vanadium (fume or dust)	50.06	0.00	0.00	0.29
Dipropylene glycol monomethyl ether	44.20	0.00	0.00	0.00
Diethylene glycol monomethyl ether	40.44	0.00	0.00	0.00
Trimethylbenzenes	39.54	0.00	0.00	0.00
Isoprene, except from vegetative emission sources	39.23	0.00	0.00	0.00
Ethylene glycol monoethyl ether acetate	32.56	0.00	0.00	0.04
2-Methyl naphthalene	29.10	0.00	0.00	0.00
Chromium	27.61	0.00	0.00	0.00

Table D.3-1. 2017 Stationary Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Ethylene glycol monoethyl ether	21.71	0.00	0.01	0.01
Glutaraldehyde	20.42	0.00	4.37	0.00
Cumene	19.36	0.00	0.00	0.00
Diethanolamine	16.65	0.00	0.10	0.00
Bromine	16.02	0.00	0.00	0.00
Diethylene glycol monoethyl ether	10.85	0.00	0.00	0.00
Cresols (mixtures of) {Cresylic acid}	9.11	0.00	0.00	0.00
Cobalt	7.76	0.00	0.00	0.00
Styrene	5.88	0.00	0.00	0.00
o-Cresol	3.93	0.00	0.00	0.00
Mercury	3.78	0.00	2.16	1.08
tert-Butyl alcohol	3.60	0.00	0.00	0.00
Ethylene glycol monopropyl ether	3.39	0.00	0.00	0.00
Silver	1.44	0.00	0.00	0.00
Antimony	0.88	0.00	0.00	0.00
Phenanthrene	0.87	0.00	0.00	0.00
Chlorodifluoromethane {Freon 22}	0.54	0.00	0.00	0.00
Selenium	0.53	0.00	0.00	0.00
Pyrene	0.41	0.00	0.00	0.00
Fluoranthene	0.29	0.00	0.00	0.00
Diethylene glycol	0.22	0.00	0.00	0.00
Phenol	0.19	0.00	0.00	0.00
Anthracene	0.08	0.00	0.00	0.00
p-Cresol	0.02	0.00	0.00	0.00
1,2-Dichlorobenzene	0.01	0.00	0.00	0.00
Dimethyl formamide	0.00	0.00	0.00	0.00
Hexachlorobenzene	0.00	0.00	0.00	0.00
Acrolein	0.00	0.00	0.00	0.00
Carbon tetrachloride	0.00	0.00	0.00	0.00
p-Dichlorobenzene	0.00	0.00	0.00	0.00
Chlorobenzene	0.00	0.00	0.00	0.00

Table D.3-1. 2017 Stationary Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Vinylidene chloride	0.00	0.00	0.00	0.00
Chloroform	0.00	0.00	0.00	0.00
1,3-Dichlorobenzene	0.00	0.00	0.00	0.00
1,4-Dioxane	0.00	0.00	0.00	0.00
Di(2-ethylhexyl) phthalate	0.00	0.00	0.00	0.00
Fluorocarbons (chlorinated)	0.00	0.00	0.00	0.00
2,4,5-Trichlorophenol	0.00	0.00	0.00	0.00
Ethylene dibromide {EDB}	0.00	0.00	0.00	0.00
Ethylene dichloride {EDC}	0.00	0.00	0.00	0.00
Vinyl chloride	0.00	0.00	0.00	0.00
Community Total (lbs/yr)	**122,265.18**	**2,073.81**	**553.15**	**272.56**

Notes:

[1] Toxicity Weighted Emissions (TWE) are adjusted emissions that consider the risk posed by the toxic pollutant. These are still emissions and not risk. They are calculated by mutlipying mass emissions by a toxicity factor (e.g, cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

Table D.3-2. 2017 Area-wide Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Cadmium	145.24	4,697.17	124.35	0.00
Arsenic	103.09	2,619.58	117.69	88.26
Nickel	383.12	767.02	468.60	328.02
p-Dichlorobenzene	5,051.53	427.86	0.11	0.00
Lead	4,113.33	380.07	0.00	0.00
Benzene	1,081.10	241.41	6.17	6.86
Formaldehyde	3,765.06	173.95	7.16	11.72
Diesel PM	68.07	157.25	0.23	0.00
Naphthalene	487.90	127.73	0.93	0.00
1,3-Butadiene	60.64	79.38	0.52	0.02
Methylene chloride {Dichloromethane}	9,945.66	76.58	0.43	0.12
Perchloroethylene {Tetrachloroethene}	1,372.38	64.46	0.67	0.01
Acetaldehyde	1,298.33	26.99	0.16	0.47
Acrylonitrile	11.98	26.76	0.04	0.00
Ethyl benzene	1,243.48	23.94	0.01	0.00
Trichloroethylene	812.36	12.51	0.02	0.00
t-Butyl acetate	8.94	0.09	0.00	0.00
Propylene oxide	0.64	0.02	0.00	0.00
Carbon tetrachloride	0.01	0.00	0.00	0.00
Ethylene oxide	0.00	0.00	0.00	0.00
Chloroform	0.00	0.00	0.00	0.00
Chlorobenzene	0.01	0.00	0.00	0.00
Ethylene glycol monoethyl ether acetate	0.03	0.00	0.00	0.00
Acrylic acid	0.04	0.00	0.00	0.00
p-Cresol	0.05	0.00	0.00	0.00
Methyl chloride {Chloromethane}	0.12	0.00	0.00	0.00
Ethylene glycol monoethyl ether	0.17	0.00	0.00	0.00
Crotonaldehyde	0.25	0.00	0.00	0.00
Dimethyl phthalate	0.31	0.00	0.00	0.00

Table D.3-2. 2017 Area-wide Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
1,2-Dichlorobenzene	0.45	0.00	0.00	0.00
N,N-Dimethylaniline	0.72	0.00	0.00	0.00
Dimethyl formamide	1.32	0.00	0.00	0.00
Ethylene glycol monomethyl ether	1.33	0.00	0.00	0.00
2,2,4-Trimethylpentane	1.33	0.00	0.00	0.00
Cumene hydroperoxide	1.62	0.00	0.00	0.00
1,2-Epoxybutane	3.64	0.00	0.00	0.00
Methyl chloroform {1,1,1-Trichloroethane}	4.12	0.00	0.00	0.00
o-Cresol	5.70	0.00	0.00	0.00
Cresols (mixtures of) {Cresylic acid}	9.11	0.00	0.00	0.00
tert-Butyl alcohol	10.57	0.00	0.00	0.00
Selenium	11.65	0.00	0.01	0.00
Vinyl acetate	12.59	0.00	0.00	0.00
2-Methyl naphthalene	18.87	0.00	0.00	0.00
Phthalic anhydride	21.25	0.00	0.02	0.00
Methyl methacrylate	28.38	0.00	0.00	0.00
Triethylamine	32.03	0.00	0.00	0.00
Tributyl phosphate	39.35	0.00	0.00	0.00
Thallium	39.67	0.00	0.00	0.00
Furan	44.36	0.00	0.00	0.00
Silver	46.71	0.00	0.00	0.00
Glutaraldehyde	48.62	0.00	10.41	0.00
Dibutyl phthalate	50.04	0.00	0.00	0.00
Trifluralin	60.93	0.00	0.00	0.00
Butyl acrylate	61.40	0.00	0.00	0.00
Acetonitrile	84.12	0.00	0.00	0.00
Mercury	95.30	0.00	54.40	27.20
sec-Butyl alcohol	101.28	0.00	0.00	0.00
Cumene	125.66	0.00	0.00	0.00
Antimony	133.06	0.00	0.00	0.00
Cyclohexanol	143.22	0.00	0.00	0.00

Table D.3-2. 2017 Area-wide Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Isoprene, except from vegetative emission sources	151.82	0.00	0.00	0.00
Bromine	171.32	0.00	0.00	0.00
p-Xylene	174.62	0.00	0.00	0.00
o-Xylene	184.90	0.00	0.00	0.00
Acrolein	191.50	0.00	9.37	13.12
Ethylene glycol monopropyl ether	203.72	0.00	0.00	0.00
Phenol	209.32	0.00	0.02	0.01
Diethanolamine	278.06	0.00	1.59	0.00
Cyclohexane	391.10	0.00	0.00	0.00
Diethylene glycol monoethyl ether	466.87	0.00	0.00	0.00
n-Butyl alcohol	493.86	0.00	0.00	0.00
m-Xylene	552.15	0.00	0.01	0.00
Propylene	552.17	0.00	0.00	0.00
Trimethylbenzenes	567.43	0.00	0.00	0.00
Hexane	591.16	0.00	0.00	0.00
Propylene glycol monomethyl ether	635.74	0.00	0.00	0.00
Propylene glycol monomethyl ether acetate	686.09	0.00	0.00	0.00
Copper	690.16	0.00	0.00	1.18
Diethylene glycol monomethyl ether	705.18	0.00	0.00	0.00
Methyl isobutyl ketone {Hexone}	739.46	0.00	0.00	0.00
Cobalt	753.35	0.00	0.00	0.00
Ethylene	958.03	0.00	0.00	0.00
1,2,4-Trimethylbenzene	1,208.34	0.00	0.00	0.00
Propionaldehyde	1,212.55	0.00	0.00	0.00
Diethylene glycol	1,271.06	0.00	0.00	0.00
Chromium	1,331.48	0.00	0.00	0.00
Styrene	1,749.45	0.00	0.03	0.01
Vanadium (fume or dust)	1,758.45	0.00	0.00	10.04
Dipropylene glycol monomethyl ether	2,026.79	0.00	0.00	0.00
Methyl ethyl ketone {2-Butanone}	2,460.75	0.00	0.00	0.03

Table D.3-2. 2017 Area-wide Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Chloropicrin	2,506.95	0.00	107.32	14.80
Dipropylene glycol	2,516.56	0.00	0.00	0.00
1,3-Dichloropropene	3,281.67	0.00	0.00	0.00
Zinc	3,539.62	0.00	0.00	0.00
Diethylene glycol monobutyl ether	5,192.26	0.00	0.00	0.00
Barium	5,828.39	0.00	0.00	0.00
Manganese	6,712.55	0.00	1,277.12	0.00
Methyl bromide {Bromomethane}	7,352.56	0.00	25.18	0.32
Xylenes (mixed)	8,611.49	0.00	0.21	0.07
Methanol	8,976.48	0.00	0.04	0.05
Phosphorus	10,080.36	0.00	0.00	0.00
Ethylene glycol monobutyl ether	11,586.75	0.00	2.42	0.42
Toluene	11,610.49	0.00	0.66	0.05
Chlorine	15,390.60	0.00	1,317.69	12.55
Ethylene glycol	20,152.41	0.00	0.86	0.00
Isopropyl alcohol	35,262.92	0.00	0.09	1.89
Acetone	43,570.09	0.00	0.00	0.00
Aluminum	544,190.91	0.00	0.00	0.00
Community Total (lbs/yr)	**800,922.21**	**9,902.77**	**3,534.55**	**517.24**

Notes:

[1] Toxicity Weighted Emissions (TWE) are adjusted emissions that consider the risk posed by the toxic pollutant. These are still emissions and not risk. They are calculated by mutlipying mass emissions by a toxicity factor (e.g, cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

Table D.3-3. 2017 On-Road Mobile Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Diesel PM	6,874.10	15,879.16	23.54	0.00
Benzene	7,535.90	1,682.77	43.01	47.79
1,3-Butadiene	794.13	1,039.51	6.80	0.21
Formaldehyde	4,811.97	222.31	9.16	14.98
Naphthalene	283.78	74.29	0.54	0.00
Ethyl benzene	3,337.47	64.25	0.03	0.00
Nickel	29.52	59.09	36.10	25.27
Acetaldehyde	2,320.55	48.24	0.28	0.85
Arsenic	0.48	12.24	0.55	0.41
Cadmium	0.20	6.38	0.17	0.00
Methyl tert-butyl ether	293.25	0.59	0.00	0.00
Lead	4.73	0.44	0.00	0.00
Manganese	74.80	0.00	14.23	0.00
Selenium	1.08	0.00	0.00	0.00
Ammonia	93.73	0.00	0.01	0.01
Barium	2,359.12	0.00	0.00	0.00
Toluene	20,256.24	0.00	1.16	0.09
Chlorine	140.60	0.00	12.04	0.11
Methanol	9,574.03	0.00	0.04	0.06
Chromium	54.00	0.00	0.00	0.00
Phosphorus	40.34	0.00	0.00	0.00
Cobalt	0.09	0.00	0.00	0.00
Styrene	346.06	0.00	0.01	0.00
Copper	503.37	0.00	0.00	0.86
Bromine	2.42	0.00	0.00	0.00
Isoprene, except from vegetative emission sources	157.67	0.00	0.00	0.00
Crotonaldehyde	101.01	0.00	0.00	0.00
Mercury	0.07	0.00	0.04	0.02
Methyl ethyl ketone {2-Butanone}	356.51	0.00	0.00	0.00
2,2,4-Trimethylpentane	6,925.30	0.00	0.00	0.00
m-Xylene	9,968.31	0.00	0.24	0.08
Cumene	80.57	0.00	0.00	0.00

Table D.3-3. 2017 On-Road Mobile Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Acrolein	42.40	0.00	2.07	2.90
Cyclohexane	1,667.24	0.00	0.00	0.00
o-Xylene	4,441.22	0.00	0.11	0.03
Propionaldehyde	336.49	0.00	0.00	0.00
Antimony	0.63	0.00	0.00	0.00
Propylene	5,738.17	0.00	0.03	0.00
p-Xylene	1,812.91	0.00	0.04	0.01
Vanadium (fume or dust)	28.75	0.00	0.00	0.16
Silver	0.28	0.00	0.00	0.00
Zinc	83.51	0.00	0.00	0.00
Thallium	0.05	0.00	0.00	0.00
Acetone	1,819.02	0.00	0.00	0.00
Aluminum	28.09	0.00	0.00	0.00
Hexane	3,581.91	0.00	0.01	0.00
1,2,4-Trimethylbenzene	4,764.00	0.00	0.00	0.00
Ethylene	11,195.80	0.00	0.00	0.00
Community Total (lbs/yr)	**112,861.88**	**19,089.28**	**150.22**	**93.86**

Notes:

[1] Toxicity Weighted Emissions (TWE) are adjusted emissions that consider the risk posed by the toxic pollutant. These are still emissions and not risk. They are calculated by mutlipying mass emissions by a toxicity factor (e.g, cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

Table D.3-4. 2017 Off-Road Mobile Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Diesel PM	16,447.67	37,994.12	56.33	0.00
1,3-Butadiene	1,167.51	1,528.27	10.00	0.30
Benzene	4,517.05	1,008.66	25.78	28.65
Formaldehyde	12,700.88	586.78	24.16	39.54
Acetaldehyde	5,380.59	111.86	0.66	1.96
Naphthalene	307.96	80.62	0.59	0.00
Ethyl benzene	1,381.29	26.59	0.01	0.00
Cadmium	0.48	15.43	0.41	0.00
Nickel	7.27	14.55	8.89	6.22
Arsenic	0.03	0.84	0.04	0.03
Lead	4.78	0.44	0.00	0.00
Methyl tert-butyl ether	0.55	0.00	0.00	0.00
Ethylene	17,323.58	0.00	0.00	0.00
Toluene	7,654.36	0.00	0.44	0.04
Propylene	5,739.30	0.00	0.03	0.00
Hexane	4,584.76	0.00	0.01	0.00
2,2,4-Trimethylpentane	3,994.03	0.00	0.00	0.00
Acetone	3,783.07	0.00	0.00	0.00
m-Xylene	3,533.23	0.00	0.09	0.03
o-Xylene	1,400.19	0.00	0.03	0.01
Methanol	1,386.73	0.00	0.01	0.01
1,2,4-Trimethylbenzene	1,204.03	0.00	0.00	0.00
Acrolein	964.79	0.00	47.20	66.08
Cyclohexane	932.14	0.00	0.00	0.00
Propionaldehyde	767.71	0.00	0.00	0.00
Methyl ethyl ketone {2-Butanone}	700.86	0.00	0.00	0.01
Crotonaldehyde	438.88	0.00	0.00	0.00
Phenol	254.47	0.00	0.02	0.01
p-Xylene	237.45	0.00	0.01	0.00
Styrene	213.66	0.00	0.00	0.00

Table D.3-4. 2017 Off-Road Mobile Source Toxic Air Contaminants Emissions Summary
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Toxic Air Contaminant (TAC)	Mass Emissions (lbs/yr)	Toxicity Weighted Emissions[1]		
		Cancer	Chronic Non-Cancer	Acute
Phosphorus	158.30	0.00	0.00	0.00
Isoprene, except from vegetative emission sources	127.81	0.00	0.00	0.00
2-Methyl naphthalene	72.51	0.00	0.00	0.00
Zinc	65.71	0.00	0.00	0.00
Cumene	46.74	0.00	0.00	0.00
Copper	17.47	0.00	0.00	0.03
Aluminum	11.71	0.00	0.00	0.00
Barium	6.33	0.00	0.00	0.00
Silver	5.52	0.00	0.00	0.00
Chromium	3.93	0.00	0.00	0.00
Manganese	2.89	0.00	0.55	0.00
Bromine	1.62	0.00	0.00	0.00
Antimony	1.31	0.00	0.00	0.00
Chlorine	0.51	0.00	0.04	0.00
Selenium	0.15	0.00	0.00	0.00
Mercury	0.12	0.00	0.07	0.03
Thallium	0.12	0.00	0.00	0.00
Cobalt	0.09	0.00	0.00	0.00
Xylenes (mixed)	0.07	0.00	0.00	0.00
Vanadium (fume or dust)	0.02	0.00	0.00	0.00
Community Total (lbs/yr)	**97,552.22**	**41,368.15**	**175.36**	**142.95**

Notes:

[1] Toxicity Weighted Emissions (TWE) are adjusted emissions that consider the risk posed by the toxic pollutant. These are still emissions and not risk. They are calculated by mutlipying mass emissions by a toxicity factor (e.g, cancer unit risk factor) as determined by the Office of Environmental Health Hazard Assessment.

APPENDIX E
SENSITIVE RECEPTORS
SUPPORTING INFORMATION

Appendix E. Sensitive Receptors Supporting Information
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Receptor Type	Receptor Name[1]	City[1]
Childcare	CHRISTIAN CHILD CARE CENTER / PRESCHOOL	EL CENTRO
Childcare	DISCOVERY LAND PRESCHOOL	EL CENTRO
Childcare	ICOE-CDS KIDS R US!	EL CENTRO
Childcare	ICOE-CDS LITTLE KING'S STATE PRESCHOOL	EL CENTRO
Childcare	ICOE-CDS LITTLE ROADRUNNER'S STATE PRESCHOOL	EL CENTRO
Childcare	ICOE-CDS LITTLE SNEAKER'S STATE PRESCHOOL	EL CENTRO
Childcare	ICOE-CDS ROOM TO GROW STATE PRESCHOOL	EL CENTRO
Childcare	ICOE-ECEP CALEXICO EARLY HEAD START	CALEXICO
Childcare	ICOE-ECEP LITTLE EAGLES STATE PRESCHOOL	CALEXICO
Childcare	ICOE-ECEP LITTLE HAWKS STATE PRESCHOOL	HEBER
Childcare	ICOE-ECEP PANTHERS HEAD START CENTER	EL CENTRO
Childcare	ICOE-ECEP TROJANS HEAD START CENTER	CALEXICO
Childcare	KENNEDY GARDENS STATE PRESCHOOL	CALEXICO
Childcare	KNOWLEDGE TREE PRESCHOOL & CHILDCARE CENTER	IMPERIAL
Childcare	LA ESCUELITA & KIDDIE WORLD DAY CARE	CALEXICO
Childcare	LITTLE EINSTEIN'S MONTESSORI	EL CENTRO
Childcare	NEIGHBORHOOD HOUSE DAYCARE CENTER	CALEXICO
Childcare	RCOE CALEXICO MIGRANT HEAD START CENTER	CALEXICO
Childcare	ST. MARY'S PRESCHOOL	EL CENTRO
Childcare	UNITED FAMILIES INC.-AURORA	EL CENTRO
Childcare	UNITED FAMILIES, INC. - CALEXICO PRESCHOOL	CALEXICO
Childcare	UNITED FAMILIES, INC. EL CENTRO PRESCHOOL	EL CENTRO
Childcare	UNITED FAMILIES, INC. /EL CENTRO PRESCHOOL II	EL CENTRO
Childcare	UNITED FAMILIES INC. - EL CENTRO	EL CENTRO
Childcare	UNITED FAMILIES, INC. - CALEXICO INF. AND TODD.	CALEXICO
Childcare	CHRISTIAN CHILD CARE CENTER/SCHOOL AGE PROG.	EL CENTRO
Childcare	ICOE-ECEP EL CENTRO EARLY HEAD START	EL CENTRO
Childcare	KINDER CASTLE LEARNING ACADEMY	EL CENTRO
Childcare	LITTLE PIONEERS PRESCHOOL	EL CENTRO
Childcare	MY FRIENDS & ME CHILD CARE LEARNING CENTER	EL CENTRO
Childcare	OUR LADY OF GUADALUPE ACADEMY/CALEXICO	CALEXICO
Adult Residential	SUNSET HOME	EL CENTRO
Adult Residential	SMOKETREE	EL CENTRO
Adult Residential	SERENITY HOME	CALEXICO
Elderly Residential	VINTAGE VILLAGE ASSISTED LIVING	EL CENTRO
Elderly Residential	VINTAGE VILLAGE 2	EL CENTRO
Elderly Residential	HEART & HAND, INC.	EL CENTRO
Elderly Residential	CASA ELITE	EL CENTRO
Elderly Residential	A&A COTTAGE VIEW ASSISTED LIVING,INC.	EL CENTRO
Hospital	EL CENTRO REGIONAL MEDICAL CENTER	EL CENTRO

Appendix E. Sensitive Receptors Supporting Information
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Receptor Type	Receptor Name[1]	City[1]
Public School	DOOL ELEMENTARY	CALEXICO
Public School	CESAR CHAVEZ ELEMENTARY	CALEXICO
Public School	DE ANZA 9TH GRADE ACADEMY	CALEXICO
Public School	AURORA HIGH (CONTINUATION)	CALEXICO
Public School	ROCKWOOD ELEMENTARY	CALEXICO
Public School	SUNFLOWER ELEMENTARY	EL CENTRO
Public School	VALLEY ACADEMY	EL CENTRO
Public School	MAINS ELEMENTARY	CALEXICO
Public School	LINCOLN ELEMENTARY	EL CENTRO
Public School	MCKINLEY ELEMENTARY	EL CENTRO
Public School	ENRIQUE CAMARENA JR. HIGH	CALEXICO
Public School	CALEXICO HIGH	CALEXICO
Public School	KENNEDY GARDENS	CALEXICO
Public School	BLANCHE CHARLES ELEMENTARY	CALEXICO
Public School	MARTIN LUTHER KING JR. ELEMENTARY	EL CENTRO
Public School	IMPERIAL VALLEY HOME SCHOOL ACADEMY	EL CENTRO
Public School	CENTRAL UNION HIGH	EL CENTRO
Public School	DE ANZA MAGNET	EL CENTRO
Public School	MARGARET HEDRICK ELEMENTARY	EL CENTRO
Public School	T. L. WAGGONER ELEMENTARY	IMPERIAL
Public School	IMPERIAL COUNTY SPECIAL EDUCATION	EL CENTRO
Public School	IMAGINE SCHOOLS AT IMPERIAL VALLEY	EL CENTRO
Public School	IMPERIAL VALLEY ROP	EL CENTRO
Public School	WILLIAM MORENO JUNIOR HIGH	CALEXICO
Public School	WASHINGTON ELEMENTARY	EL CENTRO
Public School	IMPERIAL COUNTY JUVENILE HALL/COMMUNITY	EL CENTRO
Public School	HEBER ELEMENTARY	HEBER
Public School	DOGWOOD ELEMENTARY	HEBER
Public School	KENNEDY MIDDLE	EL CENTRO
Public School	PHOENIX RISING HIGH	EL CENTRO
Public School	BALLINGTON ACADEMY FOR THE ARTS AND SCIENCES	EL CENTRO
Public School	HARDING ELEMENTARY	EL CENTRO
Public School	DESERT GARDEN ELEMENTARY	EL CENTRO
Public School	DESERT OASIS HIGH (CONTINUATION)	EL CENTRO
Public School	WILSON JR. HIGH	EL CENTRO
Public School	JEFFERSON ELEMENTARY	CALEXICO
Public School	SOUTHWEST HIGH	EL CENTRO
Public School	EL CENTRO DISTRICT WIDE PRESCHOOL	EL CENTRO
Private School	CALEXICO MISSION SCHOOL	CALEXICO

Appendix E. Sensitive Receptors Supporting Information
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Receptor Type	Receptor Name[1]	City[1]
Private School	OUR LADY OF GUADALUPE ACADEMY	CALEXICO
Private School	ST MARY S SCHOOL	EL CENTRO
Private School	VALLEY CHRISTIAN SCHOOL	IMPERIAL
Private School	VINCENT MEMORIAL CATHOLIC HIGH SCHOOL	CALEXICO

Notes:

[1] Elderly residential, adult residential, and childcare center receptors identified through the California Community Care Licensing Division. Available at: https://secure.dss.ca.gov/CareFacilitySearch/DownloadData. Accessed: March 2019.

[2] Private school, public school, hospitals, and additional childcare receptors identified through the Homeland Infrastructure Foundation-Level Data. Available at: https://secure.dss.ca.gov/CareFacilitySearch/DownloadData. Accessed: March 2019.

APPENDIX F
PERMITTING AND ENFORCEMENT SUPPORTING INFORMATION

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
399	SERVICE STATION	ANTUNEZ SHELL	500 IMPERIAL	CALEXICO	CA	92231
400	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1302 S. IMPERIAL AVE.	EL CENTRO	CA	92243
413	SERVICE STATION	SC RETAIL, LLC	940 IMPERIAL AVE	CALEXICO	CA	92231
433	SERVICE STATION	SC RETAIL, LLC	1690 SO. 4TH ST.,	EL CENTRO	CA	92243
463	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1036 IMPERIAL AVE.	CALEXICO	CA	92231
476	SERVICE STATION	BHAGVATI CORPORATION	1850 SO. IMPERIAL	EL CENTRO	CA	92243
488	SERVICE STATION	AMERI MEX SERVICES, INC. DBA DSM FUEL STOPS	2115 S 4TH ST.	EL CENTRO	CA	92243
539	PETRO. STORAGE	CALTRANS	1605 W. ADAMS	EL CENTRO	CA	92243
564	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN ST	EL CENTRO	CA	92244
634	PETRO. STORAGE	I. C. PUBLIC WORKS	HEBER ROAD YARD	HEBER	CA	92249
735	SERVICE STATION	7-ELEVEN, INC.	815 ADAMS	EL CENTRO	CA	92243
1065	CONCRETE	HALLIBURTON ENERGY SERVICES	801 SO. 2ND ST.	EL CENTRO	CA	92243
1130	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	CA	92243
1156	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA UNIT 4	EL CENTRO	CA	92243
1161	SERVICE STATION	TESORO WEST COAST COMPANY, LLC	960 N. IMPERIAL AVE.	EL CENTRO	CA	92243
1366	COMBUSTION	EL CENTRO REGIONAL MEDICAL CENTER	1415 ROSS AVE	EL CENTRO	CA	92243
1398	SERVICE STATION	7-ELEVEN, INC.	2050 S. 4TH	EL CENTRO	CA	92243
1399	SERVICE STATION	7-ELEVEN, INC.	1485 OCOTILLO	EL CENTRO	CA	92243
1500	GEOTHERMAL	HEBER FIELD COMPANY	895 PITZER ROAD	HEBER	CA	92249
1549	SERVICE STATION	7-ELEVEN, INC.	904 IMPERIAL AVE	CALEXICO	CA	92231
1632	INCINERATOR	CBP	200 E. FIRST STREET	CALEXICO	CA	92231
1641	GEOTHERMAL	HEBER GEOTHERMAL COMPANY (HGC)	895 PITZER ROAD	HEBER	CA	92249
1648	MANUFACTURING	WILBUR ELLIS COMPANY	45 W. DANENBERG ROAD	EL CENTRO	CA	92243
1649	GEOTHERMAL	HEBER FIELD COMPANY	947 DOGWOOD RD.	HEBER	CA	92249
1665	SERVICE STATION	KENNEDY MARKET	70 E. MAIN ST.	HEBER	CA	92249
1667	PAINT BOOTH	NAVAL AIR FACILITY	BLDG #508	EL CENTRO	CA	92243
1686	SERVICE STATION	NAVAL AIR FACILITY	BLDG. 200 JETMART A ST.	EL CENTRO	CA	92243
1696	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD ST,	EL CENTRO	CA	92243
1748	SERVICE STATION	7-ELEVEN, INC.	485 E. MAIN STREET	EL CENTRO	CA	92243
1801	GEOTHERMAL	HEBER FIELD COMPANY	GTW 4	HEBER	CA	92249
1802	GEOTHERMAL	HEBER FIELD COMPANY	GTW 6	HEBER	CA	92249
1886	SERVICE STATION	TESORO REFINING AND MARKETING CO.	824 IMPERIAL AVE.	CALEXICO	CA	92231
1988	SERVICE STATION	TESORO REFINING & MARKETING CO., LLC	444 S. IMPERIAL	CALEXICO	CA	92231
2055	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	CA	92231
2071	SERVICE STATION	THE GORE GROUP ENTERPRISE, INC.	1499 WEST MAIN ST.	EL CENTRO	CA	92243
2081	SERVICE STATION	ARCO AM PM/NAS, LLC	1025 KLOKE RD	CALEXICO	CA	92231
2129	SERVICE STATION	7-ELEVEN #39518A	2420 S. 4TH ST	EL CENTRO	CA	92243
2152	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 VILLA RD	EL CENTRO	CA	92243
2159	SERVICE STATION	SUPER STOP TRAVEL CENTER	550 WAKE AVE.	EL CENTRO	CA	92243
2167	SERVICE STATION	ARTHUR DSOUZA	398 AURORA DR	EL CENTRO	CA	92243
2173	MANUFACTURING	MULHERIN MONUMENTAL COMPANY	1000 S. 2ND ST	EL CENTRO	CA	92243
2187	PAINTING	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	CA	92231

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
2196	INCINERATOR	HEMS BROTHERS MORTUARY	1975 S. 4TH ST	EL CENTRO	CA	92243
2212	NON-RETAIL SS	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	CA	92231
2217	GEOTHERMAL	SECOND IMPERIAL GEOTHERMAL COMPANY SIGC	855 DOGWOOD ROAD	HEBER	CA	92249
2230	CONCRETE	CEMEX CONSTRUCTION MATERIALS PACIFIC, LLC	550 E. MAIN STREET	EL CENTRO	CA	92243
2231	GEOTHERMAL	HEBER FIELD COMPANY	DOGWOOD RD	HEBER	CA	92249
2240	AGGREGATE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN	EL CENTRO	CA	92244
2257	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	CA	92249
2258	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	CA	92249
2278	PAINT BOOTH	EL CENTRO BODY SHOP & DETAIL	240 SOUTH 3RD ST	EL CENTRO	CA	92243
2292	DRY CLEANER	MODERN CLEANERS	168 E. COLE ROAD STE. 12	CALEXICO	CA	92231
2311	PAINT BOOTH	CALIBER COLLISION CENTER	503 E. MAIN STREET	EL CENTRO	CA	92243
2316	SERVICE STATION	APRO, LLC dba MY GOODS MARKET # 1444	525 N. LABRUCHERIE	EL CENTRO	CA	92243
2349	SERVICE STATION	5 BROTHERS FUEL STOP INC	105 W. COLE BLVD.	CALEXICO	CA	92231
2359	SANDBLASTING	NAVAL AIR FACILITY	BLDG 508/PWC NAF	EL CENTRO	CA	92243
2368	SERVICE STATION	SC RETAIL, LLC	250 IMPERIAL AVE.,	CALEXICO	CA	92231
2369	HAY COMPRESSING	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	CA	92243
2373	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN	EL CENTRO	CA	92244
2390	SERVICE STATION	7-ELEVEN, INC.	168 E. COLE RD	CALEXICO	CA	92231
2405	HAY COMPRESSING	KUHN HAY	1880 JEFFREY RD	EL CENTRO	CA	92243
2416	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	CA	92243
2486	COMBUSTION	CITY OF CALEXICO	298 E. ANZA RD	CALEXICO	CA	92231
2505	SERVICE STATION	McNEECE BROS OIL CO INC	478 E. MAIN	EL CENTRO	CA	92243
2507	COMBUSTION	BRCS	1699 EAST CARR RD	CALEXICO	CA	92231
2521	SS CARDLOCK	SC COMMERCIAL, LLC		EL CENTRO	CA	
2524	COMBUSTION	CITY OF CALEXICO	V.V. WILLIAMS AVE	CALEXICO	CA	92231
2525	COMBUSTION	CITY OF CALEXICO WASTE WATER PLANT	545 PIERCE AVE	CALEXICO	CA	92231
2531	COMBUSTION	CITY OF EL CENTRO	2255 LA BRUCHERIE	EL CENTRO	CA	92243
2532	COMBUSTION	CITY OF EL CENTRO	1625 PICO ROAD	EL CENTRO	CA	92243
2534	COMBUSTION	CITY OF EL CENTRO	202 N. LABRUCHERIE	EL CENTRO	CA	92243
2535	COMBUSTION	CITY OF EL CENTRO	3010 SOUTH 8TH	EL CENTRO	CA	92243
2541	PAINT BOOTH	NICE & EASY	400 EMERSON	CALEXICO	CA	92231
2545	SS CARDLOCK	McNEECE BROS OIL CO INC	591 E HEIL	EL CENTRO	CA	92243
2551	SANDBLASTING	WYMORE, INC.	697 S. DOGWOOD RD	EL CENTRO	CA	92244
2558	MILLING	ALLSTAR SEED COMPANY	2015 SILSBEE RD.	EL CENTRO	CA	92243
2569	COMPOST	BULL HOLDING, CORP	1701 BOWKER RD.	EL CENTRO	CA	92244
2626	NON-RETAIL SS	CITY OF CALEXICO	640 PIERCE	CALEXICO	CA	92231
2631	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 524,528,564	EL CENTRO	CA	92243
2662	STORAGE	US GYPSUM COMPANY	3810 EVEN HEWES HWY	EL CENTRO	CA	92243
2693	SANDBLASTING	EW CORPORATION	1002 EAST MAIN STREET	EL CENTRO	CA	92243
2696	HAY COMPRESSING	EL TORO EXPORT	1469 LA BRUCHERIE RD	EL CENTRO	CA	92244
2700	MILLING	SEEDS WEST INC	202 E. ROSS AVE	EL CENTRO	CA	92243
2722	COMBUSTION	PACIFIC BELL TELEPHONE CO. dba AT & T	763 STATE STREET	EL CENTRO	CA	92243

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
2735	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	CA	92244
2769	SERVICE STATION	COSTCO WHOLESALE	2030 N. IMPERIAL	EL CENTRO	CA	92243
2770	COMBUSTION	PACIFIC BELL CO. dba AT & T	100 W. SHERIDAN	CALEXICO	CA	92231
2789	COMBUSTION	NAVAL AIR FACILITY	RUNWAY 8,26,30 & 12	EL CENTRO	CA	92243
2811	COMBUSTION	US GYPSUM COMPANY	3810 W. HWY 80 PLASTER CITY	EL CENTRO	CA	92243
2821	STORAGE	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	CA	92244
2828	STORAGE	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	CA	92243
2836	WASTE DISPOSAL	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	CA	92243
2864	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	CA	92243
2868	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	CA	92243
2935	COMBUSTION	FISHER WIRELESS SERVICES	703 LA BRUCHERIE	EL CENTRO	CA	92243
3011	COMBUSTION	LEVEL 3 COMMUNICATIONS, INC.	1198 INDUSTRY WAY	EL CENTRO	CA	92243
3015	COMBUSTION	I. C. PROPERTY SERVICES	328 APPLESTILL ROAD	EL CENTRO	CA	92243
3061	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES	EL CENTRO	CA	92243
3074	WASTE DISPOSAL	I. C. PUBLIC WORKS	HWY 98, & NEW RIVER,	CALEXICO	CA	92231
3076	WASTE DISPOSAL	I. C. PUBLIC WORKS	WORTHINGTON RD W OF IMPERIAL	EL CENTRO	CA	92243
3084	COMBUSTION	CITY OF EL CENTRO POLICE DEPT	150 N 11TH ST	EL CENTRO	CA	92243
3090	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	CA	92231
3109	MILLING	US GYPSUM COMPANY	3810 W. EVAN HEWES	EL CENTRO	CA	92243
3112	CONCRETE	GIBSON & SCHAEFER, INC	1143 ROCKWOOD RD	HEBER	CA	92249
3113	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 504	EL CENTRO	CA	92243
3139	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD	HEBER	CA	92249
3151	PAINT BOOTH	GUADALUPE MORENO	602 E. MAIN ST	EL CENTRO	CA	92243
3164	HAY COMPRESSING	K & M PRESS, INC.	1490 W. EVAN HEWES	EL CENTRO	CA	92243
3170	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	ZINETTA ROAD @ ALAMO RIVER	CALEXICO	CA	92231
3171	COMBUSTION	3E COMPANY/HOME DEPOT #1059	320 WAKE AVENUE	EL CENTRO	CA	92243
3195	COMBUSTION	CALIFORNIA HIGHWAY PATROL	1700 EAST CARR RD.	CALEXICO	CA	92231
3200	COMBUSTION	CITY OF CALEXICO FIRE DEPT.	415 4TH STREET	CALEXICO	CA	92231
3204	COMBUSTION	CITY OF CALEXICO	608 HEBER AVE.	CALEXICO	CA	92231
3220	PAINT BOOTH	ESCOBEDO PAINT & BODY SHOP	361 E MAIN STREET	EL CENTRO	CA	92243
3226	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	FIRE STATION #1,775 STATE	EL CENTRO	CA	92243
3227	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	900 S.DOGWOOD RD. STATION #2	EL CENTRO	CA	92243
3240	COMBUSTION	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	1990 HWY 111	EL CENTRO	CA	92243
3246	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1791 MAGGIO ROAD	CALEXICO	CA	92231
3253	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	1597 E. HWY 98	CALEXICO	CA	92231
3255	SERVICE STATION	ReEM CORPORATION dba FILLCO	324 IMPERIAL AVE	CALEXICO	CA	92231
3256	SERVICE STATION	RFH CORPORATION	1011 IMPERIAL AVE.	CALEXICO	CA	92231
3265	COMBUSTION	SAN DIEGO GAS & ELECTRIC	4.5 MILES N. HWY 98	EL CENTRO	CA	92243
3270	SERVICE STATION	MY MIHAN INC/DBA MUZZ PETROLEUM	1098 COLE ROAD	CALEXICO	CA	92231
3278	SERVICE STATION	GASTRAK OF CALEXICO, LLC	435 S MENVILLE RD.	CALEXICO	CA	92231
3295	COMBUSTION	CHARTER COMMUNICATIONS	747 EMERSON AVE.	CALEXICO	CA	92231
3306	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	PERRY SUBSTATION SITE	CALEXICO	CA	92231

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
3320	COMBUSTION	I. C. FIRE DEPT.	1078 DOGWOOD ROAD	HEBER	CA	92249
3321	DRY CLEANER	VALLEY DRY CLEANING	1480 S. 4TH STREET	EL CENTRO	CA	92243
3323	PETRO. STORAGE	SMD LOGISTICS, INC.	101 E. MAIN ST	HEBER	CA	92249
3333	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1085 INGRAM AVE.	HEBER	CA	92249
3347	SERVICE STATION	CALEXICO OIL CORPORATION	832 BIRCH ST	CALEXICO	CA	92231
3351	COMBUSTION	FMS EL CENTRO DIALYSIS	110 SOUTH 5TH ST.	EL CENTRO	CA	92243
3355	COMBUSTION	I. C. SHERIFFS DEPT.	328 APPLESTILL RD.	EL CENTRO	CA	92243
3360	COMBUSTION	ENTRAVISION COMMUNICATION	1803 N IMPERIAL AVENUE	EL CENTRO	CA	92243
3372	COMBUSTION	BRCS	200 E FIRST STREET	CALEXICO	CA	92231
3375	PAINT BOOTH	DOGWOOD AUTO BODY INC.	456 E. STATE STREET	EL CENTRO	CA	92243
3388	COMBUSTION	WALMART INC.#1859	2540 ROCKWOOD AVE	CALEXICO	CA	92231
3400	COMBUSTION	FLAT WEST WIRELESS, LLC/DBA CLEARTALK	1901 W. ADAMS AVENUE	EL CENTRO	CA	92243
3417	COMBUSTION	JC PENNEY aba THE LAW CO.	3351 S. DOGWOOD	EL CENTRO	CA	92243
3420	COMBUSTION	IMPERIAL VALLEY MALL	3451 S. DOGWOOD RD.	EL CENTRO	CA	92243
3421	COMBUSTION	CITY OF EL CENTRO	2255 LABRUCHERIE ROAD	EL CENTRO	CA	92243
3422	COMBUSTION	SEARS, ROEBUCK AND CO	3751 S. DOGWOOD AVE	EL CENTRO	CA	92243
3426	COMBUSTION	DILLARDS DEPT. STORES	3451 S. DOGWOOD DR.	EL CENTRO	CA	92243
3428	COMBUSTION	LOWE'S INC.	2053 N. IMPERIAL AVENUE	EL CENTRO	CA	92243
3432	COMBUSTION	TARGET #1816	2295 N. IMPERIAL AVE.	EL CENTRO	CA	92243
3435	COMBUSTION	CITY OF CALEXICO	298 E. ANZA ROAD	CALEXICO	CA	92231
3438	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	904 DOGWOOD ROAD	EL CENTRO	CA	92243
3442	COMBUSTION	I. C. OFFICE OF EDUCATION	1398 SPERBER RD	EL CENTRO	CA	92243
3450	COMBUSTION	MACYS, INC.	3551 S. DOGWOOD RD.	EL CENTRO	CA	92243
3468	COMBUSTION	VALLEY ENDOSCOPY CENTER	1550 N. IMPERIAL AVE. SPACE 3	EL CENTRO	CA	92243
3477	PAINT BOOTH	LUDWIG'S AUTO BODY	751 EAST MAIN ST	EL CENTRO	CA	92243
3511	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY. 80	EL CENTRO	CA	92243
3542	MANUFACTURING	US GYPSUM COMPANY	3810N W. HWY 80	EL CENTRO	CA	92243
3558	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	CA	92249
3570	PETRO. STORAGE	CITY OF CALEXICO	801 W. 2ND STREET	CALEXICO	CA	92231
3582	ASPHALT	PYRAMID CONSTRUCTION	839 DOGWOOD RD.	HEBER	CA	92249
3584	PETRO. STORAGE	BEN ABATTI FARMS	204 E. MCCABE RD.	EL CENTRO	CA	92243
3607	NON-RETAIL SS	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	CA	92243
3619	SS CARDLOCK	SC COMMERCIAL, LLC	350 MAIN STREET	EL CENTRO	CA	92243
3626	SERVICE STATION	NG PETROLEUM INC. dba FILLCO 2	1302 S. 4TH STREET	EL CENTRO	CA	92243
3635	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	1651 W. MAIN STREET	EL CENTRO	CA	92243
3637	BEEF FEEDLOT	PHILLIPS CATTLE CO.	903 WEST HWY 98	CALEXICO	CA	92231
3638	BEEF FEEDLOT	EL TORO LAND & CATTLE CO., INC.	907 BROCKMAN ROAD	EL CENTRO	CA	92243
3650	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	495 W. HEBER ROAD	EL CENTRO	CA	92243
3652	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	910 NICHOLS ROAD	EL CENTRO	CA	92243
3669	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	96 E. FAWCETT	HEBER	CA	92249
3674	COMBUSTION	IMPERIAL VALLEY EMERGENCY COMMUNICATIONS AUTHORITY (IVECA)	1141 E. HWY 98	CALEXICO	CA	92231
3686	SERVICE STATION	ARTHUR DSOUZA	3603 S. DOGWOOD	EL CENTRO	CA	92243

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
3690	COMBUSTION	I. C. PLANNING & DEVELOPMENT SERVICES	801 MAIN STREET	EL CENTRO	CA	92243
3700	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE/VARIOUS	CALEXICO	CA	92231
3742	SERVICE STATION	HRS VENTURES/RODILES	1498 COLE BLVD	CALEXICO	CA	92231
3753	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD ROAD	HEBER	CA	92249
3758	ASPHALT	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST	CALEXICO	CA	92231
3759	COMBUSTION	FRANK KALINOWSKI	602 E. ROSS AVENUE	EL CENTRO	CA	92243
3775	PAINT BOOTH	STANS AUTO BODY	1880 W. EUCLID AVE	EL CENTRO	CA	92243
3787	COMBUSTION	AT & T CORPORATION	227 AVENIDA CAMPILLO	CALEXICO	CA	92231
3806	COMBUSTION	SUN COMMUNITY FEDERAL CREDIT UNION	1068 BROADWAY	EL CENTRO	CA	92243
3883	COMBUSTION	FAA/IMPERIAL VOR FACILITY	305 E. MCCABE ROAD	EL CENTRO	CA	92243
3898	COMBUSTION	SAM BIRDSONG	1112 W. EVAN HEWES HWY	EL CENTRO	CA	92243
3915	COMBUSTION	FRESENIUS MEDICAL CARE -IC	200 WAKE AVENUE	EL CENTRO	CA	92243
3916	COMBUSTION	CITY OF EL CENTRO.	3RD ST. & COMMERCIAL	EL CENTRO	CA	92243
3917	COMBUSTION	CITY OF EL CENTRO	1101 DANENBERG DRIVE	EL CENTRO	CA	92243
3921	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD STREET	EL CENTRO	CA	92243
3943	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	1115 N. IMPERIAL AVENUE	EL CENTRO	CA	92243
3949	COMBUSTION	WEST COURTHOUSE, LLC	2003 W. ADAMS AVE	EL CENTRO	CA	92243
3964	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA ROAD	EL CENTRO	CA	92243
3971	NON-RETAIL SS	LA BRUCHERIE PRODUCE, LLC	1407 S. LABRUCHERIE ROAD	EL CENTRO	CA	92243
3973	COMBUSTION	CITY OF CALEXICO	1650 COLE ROAD	CALEXICO	CA	92231
3974	COMBUSTION	CITY OF CALEXICO/WTP	545 PIERCE AVENUE	CALEXICO	CA	92231
3980	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	MCCABE FEEDLOT 1407 LA BRUCHERIE	EL CENTRO	CA	92243
3981	COMBUSTION	HEBER FIELD COMPANY	855 DOGWOOD ROAD	HEBER	CA	92249
3984	COMBUSTION	CLINICAS DE SALUD DEL PUEBLO, INC.	223 WEST COLE	CALEXICO	CA	92231
3991	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	CA	92231
3994	COMBUSTION	CITY OF EL CENTRO	375 S. FIRST STREET	EL CENTRO	CA	92243
4016	COMBUSTION	VALLEY CONVALESCENT CENTER	1700 SOUTH IMPERIAL AVE.	EL CENTRO	CA	92243
4035	COMBUSTION	I. C. PUBLIC HEALTH DEPARTMENT	935 BROADWAY STREET	EL CENTRO	CA	92243
4083	STORAGE	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	CA	92243
4095	SERVICE STATION	PACIFICLAND INTERNATIONAL DEVELOPMENT, INC.	1105 YOURMAN ROAD	HEBER	CA	92249
4101	BEEF FEEDLOT	TAMARACK JB & SONS	1024 E HWY 98	CALEXICO	CA	92231
4103	PAINT BOOTH	ULTIMATE COLLISION CENTER	699 BROADWAY STREET	EL CENTRO	CA	92243
4104	COMBUSTION	MCCABE UNION SCHOOL DISTRICT	701 WEST MCCABE ROAD	EL CENTRO	CA	92243
4108	PAINT BOOTH	TORRES BODY SHOP	700 PIERCE AVE.	CALEXICO	CA	92231
4124	SERVICE STATION	NORTH COUNTY INVESTMENTS DBA SKY FUEL	724 EMERSON	CALEXICO	CA	92231
4125	SERVICE STATION	7-ELEVEN INC.	1101 ANDRADE AVE.	CALEXICO	CA	92231
4138	MANUFACTURING	AMETZA, LLC	1520 FORRESTER ROAD	EL CENTRO	CA	92243
4149	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	CA	92231
4158	COMBUSTION	US DEPARTMENT OF HOMELAND SECURITY IMMIGRATIONS & CUSTOMS ENFORCEMENT	1115 N. IMPERIAL	EL CENTRO	CA	92243
4161	PAINT BOOTH	MIKES PAINT AND BODY	1309 ESTRADA BLVD	CALEXICO	CA	92231
4163	COMBUSTION	TOWN PLACE SUITES EL CENTRO	3003 S DOGWOOD RD.	EL CENTRO	CA	92243
4164	COMBUSTION	CITY OF CALEXICO	PORTICO BLVD. & ROBINSON AVE.	CALEXICO	CA	92231

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
4197	COMBUSTION	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST.	CALEXICO	CA	92231
4205	NON-RETAIL SS	CITY OF EL CENTRO	1910 N. WATERMAN AVE.	EL CENTRO	CA	92243
4206	COMBUSTION	CITY OF EL CENTRO	1910 WATERMAN AVE.	EL CENTRO	CA	92243
4214	COMBUSTION	CITY OF CALEXICO	VARIOUS LOCATIONS	CALEXICO	CA	92231
4221	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	CA	92249
4243	PAINT BOOTH	CESARS BODY SHOP	202 S. 3RD STREET	EL CENTRO	CA	92243
4246	PAINT BOOTH	MANDYS AUTO BODY	565 SCARONI RD	CALEXICO	CA	92231
4248	SANDBLASTING	COMPLETE METAL FABRICATION, INC.	596 E MAIN STREET	EL CENTRO	CA	92243
4255	COMBUSTION	FMC CALEXICO	351 BIRCH STREET	CALEXICO	CA	92231
4258	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE. CALEXICO	CALEXICO	CA	92231
4266	NON-RETAIL SS	CALEXICO UNIFIED SCHOOL DISTRICT	1085 ANDRADE AVENUE	CALEXICO	CA	92231
4284	COMBUSTION	DEFENSE COMMISSARY AGENCY DECA	NAF BLD. 210	EL CENTRO	CA	92243
4286	COMBUSTION	IMPERIAL VALLEY SOLAR 1, LLC	251 FERRELL ROAD	CALEXICO	CA	92231
4294	MILLING	EL TORO LAND & CATTLE CO.	96 FAWCETT	HEBER	CA	92249
4304	COMBUSTION	SAN DIEGO GAS & ELECTRIC	1505 W. HWY 98	CALEXICO	CA	92231
4310	NON-RETAIL SS	U.S. CBP, OFFICE OF BORDER PATROL, CALEXICO STATION	536 BARBARA WORTH RD.	CALEXICO	CA	92231
4337	COMPOST	SPREADCO, INC.	910 NICHOLS ROAD	EL CENTRO	CA	92243
4338	COMBUSTION	ZAYO GROUP LLC	3810 W. EVAN HEWES HWY	EL CENTRO	CA	92243
4347	COMBUSTION	CSOLAR IV WEST, LLC	12.3 MILES W OF EL CENTRO	EL CENTRO	CA	92243
4358	COMBUSTION	MANAGEMENT & TRAINING CORPORATION	1572 GATEWAY ROAD	CALEXICO	CA	92231
4372	PAINT BOOTH	HALF BAKED POWDERCOATING	798 INDUSTRY WAY	EL CENTRO	CA	92243
4379	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	HWY 98 & E. HIGHLINE	CALEXICO	CA	92231
4381	COMBUSTION	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	W HEBER RD. & CA-7	HEBER	CA	92249
4388	COMBUSTION	NEW CINGULAR WIRELESS PCS, LLC dba AT & T MOBILITY	429 "B EAST HEBER ROAD	HEBER	CA	92249
4392	COMBUSTION	KXO, INC.	102 W. VILLA ROAD	EL CENTRO	CA	92243
4406	SANDBLASTING	HAZARD CONSTRUCTION CO.	395 E. AURORA AVE	EL CENTRO	CA	92243
4411	COMBUSTION	CALTRANS EL CENTRO	1102 MONTENEGRO WAY	EL CENTRO	CA	92243
4432	NON-RETAIL SS	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	HEBER DUNES SVRA, W. HEBER & CA-7	HEBER	CA	92249
4447	SANDBLASTING	DAMMARELL INDUSTRIES	104 E. MCCABE RD.	EL CENTRO	CA	92243
4449	PAINT BOOTH	TOMS AUTO BODY	1761 W. ADAMS AVE.	EL CENTRO	CA	92243
4449	PAINT BOOTH	TOMS AUTO BODY	1761 W. ADAMS AVE.	EL CENTRO	CA	92243
4457	NON-RETAIL SS	IMPERIAL TARP & COVERS, INC.	104 E. MCCABE RD	EL CENTRO	CA	92243
4459	PAINT BOOTH	CRIS BODY SHOP	571 SCARONI RD	CALEXICO	CA	92231
4462	COMPOST	TRUSOURCE, LLC	96 E. FAWCETT ROAD	HEBER	CA	92249
4471	PAINT BOOTH	PRO 1 COLLISION CENTER	345 W. STATE STREET	EL CENTRO	CA	92243
4481	NON-RETAIL SS	CALIFORNIA DEPARTMENT OF TRANSPORTATION	1102 MONTENEGRO WAY	EL CENTRO	CA	92243
4526	COMBUSTION	CLX WEST V/P	200 EAST 1ST. STREET	CALEXICO	CA	92231
4535	COMBUSTION	CENTRAL UNION HIGH SCHOOL	1001 S. STREET	EL CENTRO	CA	92243
4536	PAINT BOOTH	OSCAR O HERNANDEZ	705 HAROLD SUITE C	CALEXICO	CA	92231
4551	MILLING	LONDON SEEDS	1872 N. DREW ROAD	EL CENTRO	CA	92273
4553	PAINT BOOTH	C R & R INC.	853 DOGWOOD ROAD	EL CENTRO	CA	92243
4556	COMBUSTION	CITY OF EL CENTRO	1661 LABRUCHERIE ROAD	EL CENTRO	CA	92243

Table F.1-1a. ICAPCD Permitted Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Application No.	Permit Description	Facility Name	Facility Address	Facility City	Facility State	Facility Zip
4558	COMBUSTION	GREENFIX AMERICA, LLC	255 EAST COMMERCIAL AVE	EL CENTRO	CA	92243
4566	PAINT BOOTH	ADAMS REPAIR SHOP	1647 ADAMS AVENUE	EL CENTRO	CA	92243
4567	COMBUSTION	93LF 8ME, LLC	251 FERRELL ROAD	EL CENTRO	CA	92232
4581	COMBUSTION	MARTY COYNE	1895 BENNETT ROAD	EL CENTRO	CA	92243
4583	COMBUSTION	MORTENSON CONSTRUCTION	392 WEED ROAD	CALEXICO	CA	92231

Notes:
1. Facilities were identified by filtering the ICAPCD permitted facility list by location. This table presents all active permits for facilities located within El Centro, Heber, and Calexico as of February 2018.

Abbreviations:
SS - Stationary Source

Table F.1-1b. ICAPCD Permit Classifications for Facilities within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Permit Description	Permit Count	Percentage
AGGREGATE	1	0%
ASPHALT	2	1%
BEEF FEEDLOT	7	3%
COMBUSTION	110	43%
COMPOST	3	1%
CONCRETE	5	2%
DAIRY	0	0%
DRY CLEANER	2	1%
GEOTHERMAL	9	4%
GEOTHERMAL WELL	0	0%
HAY COMPRESSING	4	2%
INCINERATOR	2	1%
MANUFACTURING	8	3%
MILLING	5	2%
MINING	0	0%
MISCELLANEOUS	0	0%
NON-RETAIL SS	10	4%
PAINT BOOTH	21	8%
PAINT BOOTH	1	0%
PAINTING	1	0%
PETRO. DISTRIB.	0	0%
PETRO. STORAGE	5	2%
POWER GENERATION	3	1%
SANDBLASTING	8	3%
SERVICE STATION	40	16%
SOIL REMEDIATION	0	0%
SS CARDLOCK	3	1%
STORAGE	4	2%
WASTE DISPOSAL	3	1%
WOOD PROCESSING	0	0%
TOTAL	**257**	100%

Notes:

1. Permits for facilities within the El Centro-Heber-Calexico Corridor are classified in the table above by permit description.

Abbreviations:

SS - Stationary Source

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	2240	AGGREGATE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN	EL CENTRO	10/25/2016
2016	3758	ASPHALT	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST	CALEXICO	9/26/2016
2016	3582	ASPHALT	PYRAMID CONSTRUCTION	839 DOGWOOD RD.	HEBER	12/20/2016
2016	3669	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	96 E. FAWCETT	HEBER	5/23/2016
2016	3980	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	MCCABE FEEDLOT 1407 LA BRUCHERIE	EL CENTRO	5/23/2016
2016	3637	BEEF FEEDLOT	EL TORO LAND & CATTLE CO., INC.	903 WEST HWY 98	CALEXICO	1/12/2016
2016	3638	BEEF FEEDLOT	EL TORO LAND & CATTLE CO., INC.	907 BROCKMAN ROAD	EL CENTRO	5/23/2016
2016	3650	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	495 W. HEBER ROAD	EL CENTRO	5/2/2016
2016	3652	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	910 NICHOLS ROAD	EL CENTRO	5/2/2016
2016	4101	BEEF FEEDLOT	TAMARACK JB & SONS	1024 E HWY 98	CALEXICO	1/12/2016
2016	3171	COMBUSTION	3E COMPANY/HOME DEPOT #1059	320 WAKE AVENUE	EL CENTRO	1/22/2016
2016	4197	COMBUSTION	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST.	CALEXICO	4/4/2016
2016	2789	COMBUSTION	AOC SUPPORT SERVICES, LLC	RUNWAY 8,26,30 & 12	EL CENTRO	10/3/2016
2016	3787	COMBUSTION	AT & T CORPORATION	227 AVENIDA CAMPILLO	CALEXICO	11/4/2016
2016	2507	COMBUSTION	BRCS	1699 EAST CARR RD	CALEXICO	11/1/2016
2016	3372	COMBUSTION	BRCS	200 E FIRST STREET	CALEXICO	11/1/2016
2016	4381	COMBUSTION	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	W HEBER RD. & CA-7	HEBER	3/23/2016
2016	3195	COMBUSTION	CALIFORNIA HIGHWAY PATROL	1700 EAST CARR RD.	CALEXICO	6/21/2016
2016	4411	COMBUSTION	CALTRANS EL CENTRO	1102 MONTENEGRO WAY	EL CENTRO	ATC 2016
2016	3240	COMBUSTION	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	1990 HWY 111	EL CENTRO	7/5/2016
2016	2055	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	2/22/2016
2016	2486	COMBUSTION	CITY OF CALEXICO	298 E. ANZA RD	CALEXICO	2/22/2016
2016	2524	COMBUSTION	CITY OF CALEXICO	V.V. WILLIAMS AVE	CALEXICO	4/4/2016
2016	3090	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	2/23/2016
2016	3204	COMBUSTION	CITY OF CALEXICO	608 HEBER AVE.	CALEXICO	2/11/2016
2016	3435	COMBUSTION	CITY OF CALEXICO	298 E. ANZA ROAD	CALEXICO	6/14/2016
2016	3973	COMBUSTION	CITY OF CALEXICO	1650 COLE ROAD	CALEXICO	4/4/2016
2016	4164	COMBUSTION	CITY OF CALEXICO	PORTICO BLVD. & ROBINSON AVE.	CALEXICO	12/30/2016
2016	4214	COMBUSTION	CITY OF CALEXICO	VARIOUS LOCATIONS	CALEXICO	2/3/2016
2016	4258	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE. CALEXICO	CALEXICO	6/13/2016
2016	3700	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE	CALEXICO	6/13/2016
2016	3200	COMBUSTION	CITY OF CALEXICO FIRE DEPT.	430 E. 5TH ST.	CALEXICO	8/9/2016
2016	2525	COMBUSTION	CITY OF CALEXICO WASTE WATER PLANT	545 PIERCE AVE	CALEXICO	6/14/2016
2016	3974	COMBUSTION	CITY OF CALEXICO/WTP	545 PIERCE AVENUE	CALEXICO	6/14/2016
2016	3917	COMBUSTION	CITY OF EL CENTRO	1101 DANENBERG DRIVE	EL CENTRO	4/20/2016
2016	2531	COMBUSTION	CITY OF EL CENTRO	2255 LA BRUCHERIE	EL CENTRO	5/3/2016
2016	2532	COMBUSTION	CITY OF EL CENTRO	1625 PICO ROAD	EL CENTRO	5/3/2016
2016	2534	COMBUSTION	CITY OF EL CENTRO	202 N. LABRUCHERIE	EL CENTRO	4/20/2016

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	2535	COMBUSTION	CITY OF EL CENTRO	3010 SOUTH 8TH	EL CENTRO	4/20/2016
2016	3421	COMBUSTION	CITY OF EL CENTRO	2255 LABRUCHERIE ROAD	EL CENTRO	5/3/2016
2016	3994	COMBUSTION	CITY OF EL CENTRO	375 S. FIRST STREET	EL CENTRO	4/20/2016
2016	3226	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	FIRE STATION #1,775 STATE	EL CENTRO	2/29/2016
2016	3227	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	900 S.DOGWOOD RD. STATION #2	EL CENTRO	2/29/2016
2016	3084	COMBUSTION	CITY OF EL CENTRO POLICE DEPT	150 N 11TH ST	EL CENTRO	6/28/2016
2016	3916	COMBUSTION	CITY OF EL CENTRO.	3RD ST. & COMMERICAL	EL CENTRO	5/3/2016
2016	3984	COMBUSTION	CLINCAS DE SALUD DEL PUEBLO, INC.	223 WEST COLE	CALEXICO	6/17/2016
2016	4284	COMBUSTION	DEFENSE COMMISSARY AGENCY DECA	NAF BLD. 210	EL CENTRO	10/3/2016
2016	3991	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	10/27/2016
2016	4149	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	10/27/2016
2016	3943	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	1115 N. IMPERIAL AVENUE	EL CENTRO	6/20/2016
2016	3426	COMBUSTION	DILLARDS DEPT. STORES	3451 S. DOGWOOD DR.	EL CENTRO	7/20/2016
2016	1366	COMBUSTION	EL CENTRO REGIONAL MEDICAL CENTER	1415 ROSS AVE	EL CENTRO	10/18/2016
2016	4436	COMBUSTION	EL CENTRO REGIONAL MEDICAL CENTER	1415 ROSS AVE.	EL CENTRO	2/10/2016
2016	4294	COMBUSTION	EL TORO LAND & CATTLE CO.	96 FAWCETT	HEBER	6/15/2016
2016	3360	COMBUSTION	ENTRAVISION COMMUNICATION	1803 N IMPERIAL AVENUE	EL CENTRO	8/26/2016
2016	3883	COMBUSTION	FAA/IMPERIAL VOR FACILITY	305 E. MCCABE ROAD	EL CENTRO	12/5/2016
2016	2935	COMBUSTION	FISHER WIRELESS SERVICES	703 LA BRUCHERIE	EL CENTRO	4/20/2016
2016	3400	COMBUSTION	FLAT WEST WIRELESS, LLC/DBA CLEARTALK	1646 OCOTILLO DRIVE	EL CENTRO	12/14/2016
2016	4255	COMBUSTION	FMC CALEXICO	351 BIRCH STREET	CALEXICO	1/12/2016
2016	3351	COMBUSTION	FMS EL CENTRO DIALYSIS	110 SOUTH 5TH ST.	EL CENTRO	1/12/2016
2016	3707	COMBUSTION	FOREVER 21	1113 W. IMPERIAL AVE.	CALEXICO	6/17/2016
2016	3759	COMBUSTION	FRANK KALINOWSKI	602 E. ROSS AVENUE	EL CENTRO	8/8/2016
2016	3915	COMBUSTION	FRESENIUS MDEDICAL CARE -IC	200 WAKE AVENUE	EL CENTRO	1/12/2016
2016	3981	COMBUSTION	HEBER FIELD COMPANY	855 DOGWOOD ROAD	HEBER	2/10/2016
2016	3139	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD	HEBER	2/2/2016
2016	3333	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1085 INGRAM AVE.	HEBER	2/3/2016
2016	3558	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	2/2/2016
2016	3753	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD ROAD	HEBER	2/2/2016
2016	4221	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	2/2/2016
2016	3170	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	ZINETTA ROAD @ ALAMO RIVER	CALEXICO	8/16/2016
2016	3253	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	1597 E. HWY 98	CALEXICO	8/16/2016
2016	3442	COMBUSTION	I. C. OFFICE OF EDUCATION	1398 SPERBER RD	EL CENTRO	3/21/2016
2016	3015	COMBUSTION	I. C. PROPERTY SERVICES	328 APPLESTILL RD./SHERIFF	EL CENTRO	3/17/2016
2016	3355	COMBUSTION	I. C. SHERIFFS DEPT.	328 APPLESTILL RD.	EL CENTRO	12/1/2016
2016	3320	COMBUSTION	I.C. FIRE DEPT.	1078 DOGWOOD ROAD	HEBER	4/11/2016
2016	3690	COMBUSTION	I.C. PLANNING & DEVELOPMENT SERVICES	801 MAIN STREET	EL CENTRO	7/13/2016

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	3295	COMBUSTION	I.V. CABLEVISION, INC.	747 EMERSON AVE.	CALEXICO	4/11/2016
2016	4035	COMBUSTION	IMPERIAL COUNTY PUBLIC HEALTH DEPARTMENT	935 BROADWAY STREET	EL CENTRO	7/13/2016
2016	2593	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	904 N. DOGWOOD RD	EL CENTRO	7/21/2016
2016	2864	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	3/9/2016
2016	2868	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	7/21/2016
2016	3438	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	904 DOGWOOD ROAD	EL CENTRO	7/21/2016
2016	3635	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	1651 W. MAIN STREET	EL CENTRO	5/12/2016
2016	3420	COMBUSTION	IMPERIAL VALLEY MALL	3451 S. DOGWOOD RD.	EL CENTRO	7/20/2016
2016	3674	COMBUSTION	IVECA	1141 E. HWY 98	CALEXICO	12/1/2016
2016	3417	COMBUSTION	JC PENNY aba THE LAW CO.	3351 S. DOGWOOD	EL CENTRO	7/19/2016
2016	4392	COMBUSTION	KXO, INC.	102 W. VILLA ROAD	EL CENTRO	8/4/2016
2016	3011	COMBUSTION	LEVEL 3 COMMUNICATIONS,INC.	1198 INDUSTRY WAY	EL CENTRO	6/6/2016
2016	3428	COMBUSTION	LOWE'S INC.	2053 N. IMPERIAL AVENUE	EL CENTRO	1/21/2016
2016	3450	COMBUSTION	MACYS, INC.	3555 S. DOGWOOD RD.	EL CENTRO	7/21/2016
2016	4358	COMBUSTION	MANAGEMENT & TRAINING CORPORATION	1499 STATE HIGHWAY 98	CALEXICO	6/21/2016
2016	4104	COMBUSTION	MCCABE UNION SCHOOL DISTRICT	701 WEST MCCABE ROAD	EL CENTRO	7/7/2016
2016	4326	COMBUSTION	MOUNT SIGNAL SOLAR FARM 1	251 FERREL ROAD	CALEXICO	8/2/2016
2016	2631	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 524,528,564	EL CENTRO	10/3/2016
2016	3113	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 492	EL CENTRO	10/3/2016
2016	4388	COMBUSTION	NEW CINGULAR WIRELESS PCS, LLC dba AT & T MOBILITY	429 "B EAST HEBER ROAD	HEBER	12/1/2016
2016	2770	COMBUSTION	PACIFIC BELL CO. dba AT & T	100 W. SHERIDAN	CALEXICO	11/3/2016
2016	2722	COMBUSTION	PACIFIC BELL TELEPHONE CO. dba AT & T	763 STATE STREET	EL CENTRO	11/4/2016
2016	4211	COMBUSTION	PYRAMID CONSTRUCTION	839 DOGWOOD RD.	HEBER	5/17/2016
2016	4454	COMBUSTION	PYRAMID CONSTRUCTION AND AGGREGATES, INC.	VARIOUS	HEBER	ATC 2016
2016	4245	COMBUSTION	PYRAMID CONTRUCTION	VARIOUS LOCATIONS	HEBER	10/18/2016
2016	3898	COMBUSTION	SAM BIRDSONG	1112 W. EVAN HEWES HWY	EL CENTRO	12/21/2016
2016	3265	COMBUSTION	SAN DIEGO GAS & ELECTRIC	4.5 MILES N. HWY 98	EL CENTRO	8/23/2016
2016	4304	COMBUSTION	SAN DIEGO GAS & ELECTRIC	1505 W. HWY 98	CALEXICO	8/23/2016
2016	3422	COMBUSTION	SEARS, ROEBUCK AND CO	3751 S. DOGWOOD AVE	EL CENTRO	10/5/2016
2016	4286	COMBUSTION	SILVER RIDGE POWER	251 FERRELL ROAD	CALEXICO	8/2/2016
2016	3806	COMBUSTION	SUN COMMUNITY FEDERAL CREDIT UNION	1068 BROADWAY	EL CENTRO	6/24/2016
2016	3432	COMBUSTION	TARGET #1816	2295 N. IMPERIAL AVE.	EL CENTRO	1/20/2016
2016	4163	COMBUSTION	TOWN PLACE SUITES EL CENTRO	3003 S DOGWOOD RD.	EL CENTRO	7/11/2016
2016	3319	COMBUSTION	TOYS R US	2600 ROCKWOOD AVE	CALEXICO	10/25/2016
2016	4158	COMBUSTION	CUSTOMS ENFORCEMENT	1115 N. IMPERIAL	EL CENTRO	6/20/2016
2016	1130	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	2/23/2016
2016	2811	COMBUSTION	US GYPSUM COMPANY	3810 W. HWY 80 PLASTER CITY	EL CENTRO	2/23/2016
2016	3061	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES	EL CENTRO	2/23/2016

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	3468	COMBUSTION	VALLEY ENDOSCOPY CENTER	1550 N. IMPERIAL AVE. SPACE 3	EL CENTRO	1/21/2016
2016	4016	COMBUSTION	VALLEY CONVALESCENT CENTER	1700 SOUTH IMPERIAL AVE.	EL CENTRO	1/19/2016
2016	3388	COMBUSTION	WAL-MART STORES,INC.#1859	2540 ROCKWOOD AVE	CALEXICO	4/11/2016
2016	3949	COMBUSTION	WEST COURTHOUSE, LLC	2003 W. ADAMS AVE	EL CENTRO	9/26/2016
2016	4338	COMBUSTION	ZAYO GROUP LLC	3810 W. EVAN HEWES HWY	EL CENTRO	11/7/2016
2016	4337	COMPOST	SPREADCO, INC.	910 NICHOLS ROAD	EL CENTRO	8/19/2016
2016	2230	CONCRETE	CEMEX, USA	550 E. MAIN	EL CENTRO	2/9/2016
2016	3112	CONCRETE	GIBSON & SCHAEFER, INC	1143 ROCKWOOD RD	HEBER	2/8/2016
2016	1065	CONCRETE	HALLIBURTON ENERGY SERVICES	801 SO. 2ND ST.	EL CENTRO	12/28/2016
2016	564	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN ST	EL CENTRO	10/26/2016
2016	2373	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN	EL CENTRO	10/26/2016
2016	2663	CUTTING	US GYPSUM COMPANY	381 W. HWY 80	EL CENTRO	2/23/2016
2016	2292	DRY CLEANER	MODERN CLEANERS	168 E. COLE ROAD STE. 12	CALEXICO	3/2/2016
2016	3321	DRY CLEANER	VALLEY DRY CLEANING	1480 S. 4TH STREET	EL CENTRO	3/9/2016
2016	1500	GEOTHERMAL	HEBER FIELD COMPANY	895 PITZER ROAD	HEBER	2/10/2016
2016	1649	GEOTHERMAL	HEBER FIELD COMPANY	947 DOGWOOD RD.	HEBER	2/10/2016
2016	1801	GEOTHERMAL	HEBER FIELD COMPANY	GTW 4	HEBER	2/10/2016
2016	1802	GEOTHERMAL	HEBER FIELD COMPANY	GTW 6	HEBER	2/10/2016
2016	2231	GEOTHERMAL	HEBER FIELD COMPANY	DOGWOOD RD	HEBER	2/10/2016
2016	2257	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	2/10/2016
2016	2258	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	2/10/2016
2016	1641	GEOTHERMAL	HEBER GEOTHERMAL COMPANY (HGC)	895 PITZER ROAD	HEBER	2/10/2016
2016	2217	GEOTHERMAL	SECOND IMPERIAL GEOTHERMAL COMPANY SIGC	855 DOGWOOD ROAD	HEBER	2/10/2016
2016	2369	HAY COMPRESSING	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	6/23/2016
2016	2696	HAY COMPRESSING	EL TORO EXPORT	1469 LA BRUCHERIE RD	EL CENTRO	10/17/2016
2016	3164	HAY COMPRESSING	K & M PRESS, INC.	1490 W. EVAN HEWES	EL CENTRO	5/23/2016
2016	2405	HAY COMPRESSING	KUHN HAY	1880 JEFFREY RD	EL CENTRO	9/7/2016
2016	1632	INCINERATOR	CBP	200 E. FIRST STREET	CALEXICO	9/1/2016
2016	2196	INCINERATOR	HEMS BROTHERS MORTUARY	1975 S. 4TH ST	EL CENTRO	12/6/2016
2016	4138	MANUFACTURING	AMETZA, LLC	1520 FORRESTER ROAD	EL CENTRO	9/21/2016
2016	2569	MANUFACTURING	BULL HOLDING, CORP	1701 BOWKER RD.	EL CENTRO	12/28/2016
2016	2173	MANUFACTURING	MULHERIN MONUMENTAL COMPANY	1000 S. 2ND ST	EL CENTRO	1/6/2016
2016	2735	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/23/2016
2016	3511	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY. 80	EL CENTRO	2/23/2016
2016	3542	MANUFACTURING	US GYPSUM COMPANY	3810N W. HWY 80	EL CENTRO	2/23/2016
2016	4357	MANUFACTURING	WEST COAST SOIL AMENDMENTS	420 KUBLER ROAD	CALEXICO	ATC 2016
2016	1696	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD ST,	EL CENTRO	8/30/2016
2016	3921	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD STREET	EL CENTRO	8/30/2016

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	1648	MANUFACTURING	WILBUR ELLIS COMPANY	45 W. DANENBERG ROAD	EL CENTRO	9/1/2016
2016	2558	MILLING	ALLSTAR SEED COMPANY	2015 SILSBEE RD.	EL CENTRO	4/15/2016
2016	2700	MILLING	SEEDS WEST INC	202 E. ROSS AVE	EL CENTRO	5/6/2016
2016	3109	MILLING	US GYPSUM COMPANY	3810 W. EVAN HEWES	EL CENTRO	2/23/2016
2016	4432	NON RETAIL SS	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	HEBER DUNES SVRA W. HEBER & CA-7	HEBER	12/14/2016
2016	4205	NON RETAIL SS	CITY OF EL CENTRO	1910 N. WATERMAN AVE.	EL CENTRO	3/9/2016
2016	4266	NON-RETAIL SS	CALEXICO UNIFIED SCHOOL DISTRICT	1085 ANDRADE AVENUE	CALEXICO	7/20/2016
2016	2626	NON-RETAIL SS	CITY OF CALEXICO	640 PIERCE	CALEXICO	7/29/2016
2016	3607	NON-RETAIL SS	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	1/12/2016
2016	2212	NON-RETAIL SS	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	11/4/2016
2016	3971	NON-RETAIL SS	LA BRUCHERIE PRODUCE, LLC	1407 S. LABRUCHERIE ROAD	EL CENTRO	7/26/2016
2016	4310	NON-RETAIL SS	U.S. CBP, OFFICE OF BORDER PATROL, CALEXICO STATION	536 BARBARA WORTH RD.	CALEXICO	10/27/2016
2016	4352	PAINT BOOTH	760 AUTO	345 W. OLIVE AVE.	EL CENTRO	CLOSED 2016
2016	2311	PAINT BOOTH	CALIBER COLLISION CENTER	503 E. MAIN STREET	EL CENTRO	3/23/2016
2016	4243	PAINT BOOTH	CESARS BODY SHOP	202 S. 3RD STREET	EL CENTRO	4/12/2016
2016	3375	PAINT BOOTH	DOGWOOD AUTO BODY INC.	456 E. STATE STREET	EL CENTRO	5/02/2016
2016	2278	PAINT BOOTH	EL CENTRO BODY SHOP	240 SOUTH 3RD ST	EL CENTRO	2/9/2016
2016	3220	PAINT BOOTH	ESCOBEDO PAINT & BODY SHOP	361 E MAIN STREET	EL CENTRO	7/27/2016
2016	3151	PAINT BOOTH	GUADALUPE MORENO	602 E. MAIN ST	EL CENTRO	3/14/2016
2016	3800	PAINT BOOTH	HI-TECK AUTO BODY	799 E. MAIN STREET	EL CENTRO	6/29/2016
2016	3477	PAINT BOOTH	LUDWIG'S AUTO BODY	751 EAST MAIN ST	EL CENTRO	1/5/2016
2016	4246	PAINT BOOTH	MANDYS AUTO BODY	565 SCARONI RD	CALEXICO	1/7/2016
2016	4161	PAINT BOOTH	MIKES PAINT AND BODY	1309 ESTRADA BLVD	CALEXICO	2/3/2016
2016	2303	PAINT BOOTH	MODERN PAINT & BODY SHOP	830 STATE ST	EL CENTRO	7/21/2016
2016	1667	PAINT BOOTH	NAVAL AIR FACILITY	BLDG #508	EL CENTRO	6/27/2016
2016	2541	PAINT BOOTH	NICE & EASY	400 EMERSON	CALEXICO	2/10/2016
2016	3887	PAINT BOOTH	OSCAR HERNANDEZ BODY SHOP	555 CESAR CHAVEZ BLVD	CALEXICO	8/11/2016
2016	3775	PAINT BOOTH	STANS AUTO BODY	1880 W. EUCLID AVE	EL CENTRO	6/29/2016
2016	4108	PAINT BOOTH	TORRES BODY SHOP	700 PIERCE AVE.	CALEXICO	2/10/2016
2016	4103		MOLES GARAGE	699 BROADWAY STREET	EL CENTRO	5/11/2016
2016	4459	PAINTBOOTH	CRIS BODY SHOP	571 SCARIONI RD	CALEXICO	ATC 2016
2016	4372	PAINTBOOTH	HALF BAKED POWDERCOATING	703 INDUSTRY WAY SUITE 3	EL CENTRO	6/1/2016
2016	4449	PAINTBOOTH	TOMS AUTO BODY	1761 W. ADAMS AVE.	EL CENTRO	6/28/2016
2016	2187	PAINTING	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	4/22/2016
2016	3584	PETRO STORAGE	BEN ABATTI FARMS	204 E. MCCABE RD.	EL CENTRO	12/9/2016
2016	3323	PETRO STORAGE	SMD LOGISTICS, INC.	101 E. MAIN ST	HEBER	8/10/2016
2016	539	PETRO. STORAGE	CALTRANS/ATTN: JEFF O' CONNELL	1605 W. ADAMS	EL CENTRO	11/29/2016
2016	3570	PETRO. STORAGE	CITY OF CALEXICO	801 W. 2ND STREET	CALEXICO	7/29/2016

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	634	PETRO. STORAGE	I. C. PUBLIC WORKS	HEBER ROAD YARD	HEBER	5/24/2016
2016	1156	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA UNIT 4	EL CENTRO	3/9/2016
2016	2152	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 VILLA RD UNIT 2	EL CENTRO	3/9/2016
2016	3964	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD. UNIT 3	EL CENTRO	3/9/2016
2016	2956	SANDBLASTING	CITY OF EL CENTRO WASTEWATER	2255 LABRUCHERIE	EL CENTRO	CLOSED 1/01/2016
2016	4248	SANDBLASTING	COMPLETE METAL FABRICATION, INC.	596 E MAIN STREET	EL CENTRO	5/13/2016
2016	4447	SANDBLASTING	DAMMARELL INDUSTRIES	104 E. MCCABE RD.	EL CENTRO	7/15/2016
2016	2693	SANDBLASTING	EW CORPORATION	1002 EAST MAIN STREET	EL CENTRO	12/19/2016
2016	4406	SANDBLASTING	HAZARD CONSTRUCTION CO.	395 E. AURORA AVE	EL CENTRO	9/12/2016
2016	2416	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	3/9/2016
2016	4379	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	HWY 98 & E. HIGHLINE	CALEXICO	5/11/2016
2016	2359	SANDBLASTING	NAVAL AIR FACILITY	BLDG 508/PWC NAF	EL CENTRO	6/27/2016
2016	2958	SANDBLASTING	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN STREET	EL CENTRO	3/15/2016
2016	2551	SANDBLASTING	WYMORE, INC.	697 S. DOGWOOD RD	EL CENTRO	6/7/2016
2016	2129	SERVICE STATION	7-ELEVEN #39518A	2420 S. 4TH ST	EL CENTRO	12/5/2016
2016	4125	SERVICE STATION	7-ELEVEN INC.	1101 ANDRADE AVE.	CALEXICO	3/28/2016
2016	735	SERVICE STATION	7-ELEVEN, INC.	815 ADAMS	EL CENTRO	1/8/2015
2016	1398	SERVICE STATION	7-ELEVEN, INC.	2050 S. 4TH	EL CENTRO	6/1/2016
2016	1399	SERVICE STATION	7-ELEVEN, INC.	1485 OCOTILLO	EL CENTRO	1/5/2016
2016	1549	SERVICE STATION	7-ELEVEN, INC.	904 IMPERIAL AVE	CALEXICO	1/5/2016
2016	1748	SERVICE STATION	7-ELEVEN, INC.	485 E. MAIN STREET	EL CENTRO	3/2/2016
2016	2390	SERVICE STATION	7-ELEVEN, INC.	168 E. COLE RD	CALEXICO	2/3/2016
2016	488	SERVICE STATION	AMERI MEX SERVICES, INC. DBA DSM FUEL STOPS	2115 S 4TH ST.	EL CENTRO	10/13/2016
2016	399	SERVICE STATION	ANTUNEZ SHELL	500 IMPERIAL	CALEXICO	1/7/2016
2016	2061	SERVICE STATION	APEX ENERGY VENTURES, LLC	1963 S. HWY 111	EL CENTRO	1/26/2016
2016	2316	SERVICE STATION	APRO, LLC dba MY GOODS MARKET # 1444	525 N. LABRUCHERIE	EL CENTRO	11/10/2016
2016	2081	SERVICE STATION	ARCO AM PM/NAS, LLC	1025 KLOKE RD	CALEXICO	4/6/2016
2016	476	SERVICE STATION	BHAGVATI CORPORATION	1850 SO.IMPERIAL	EL CENTRO	1/18/2016
2016	3347	SERVICE STATION	CALEXICO OIL CORPORATION	832 BIRCH ST	CALEXICO	4/14/2016
2016	2769	SERVICE STATION	COSTCO #121	2030 N. IMPERIAL	EL CENTRO	5/23/2016
2016	3686	SERVICE STATION	EL CENTRO CORNER INC. AM/PM #82642	3603 S. DOGWOOD	EL CENTRO	11/21/2016
2016	2167	SERVICE STATION	EL CENTRO CORNER INC. dba ARCO AM PM 82300	398 AURORA DRIVE	EL CENTRO	2/19/2016
2016	2071	SERVICE STATION	EL CENTRO CORNER INC. dba ARCO AM PM 82302	1499 WEST MAIN ST.	EL CENTRO	4/26/2016
2016	3278	SERVICE STATION	GASTRAK OF CALEXICO, LLC	435 S MENVILLE RD.	CALEXICO	10/6/2016
2016	3742	SERVICE STATION	HRS VENTURES/RODILES	1498 COLE BLVD	CALEXICO	12/8/2016
2016	3626	SERVICE STATION	J.A.G. CAPITAL INVESTMENTS, INC DBA FILLCO	1302 S. 4TH STREET	EL CENTRO	12/13/2016
2016	1665	SERVICE STATION	KENNEDY MARKET	70 E. MAIN ST.	HEBER	8/9/2016
2016	2505	SERVICE STATION	McNEECE BROS OIL CO INC	478 E. MAIN	EL CENTRO	10/12/2016

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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2016	3270	SERVICE STATION	MY MIHAN INC/DBA MUZZ PETROLEUM	1098 COLE ROAD	CALEXICO	4/13/2016
2016	1686	SERVICE STATION	NAVAL AIR FACILITY	BLDG. 200 JETMART A ST.	EL CENTRO	8/23/2016
2016	4095	SERVICE STATION	PACIFICLAND INTERNATIONAL DEVELOPMENT, INC.	HEBER & YOURMAN	HEBER	7/15/2016
2016	3255	SERVICE STATION	ReEM CORPORATION dba FILLCO	324 IMPERIAL AVE	CALEXICO	3/8/2016
2016	3256	SERVICE STATION	RFH CORPORATION	1011 IMPERIAL AVE.	CALEXICO	1/8/2015
2016	2159	SERVICE STATION	SUPER STOP TRAVEL CENTER	550 WAKE AVE.	EL CENTRO	6/6/2016
2016	1988	SERVICE STATION	TESORO REFINING & MARKETING CO., LLC	444 S. IMPERIAL	CALEXICO	6/7/2016
2016	400	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1302 S. IMPERIAL AVE.	EL CENTRO	5/31/2016
2016	463	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1036 IMPERIAL AVE.	CALEXICO	10/25/2016
2016	1161	SERVICE STATION	TESORO REFINING AND MARKETING CO.	960 N. IMPERIAL AVE.	EL CENTRO	3/2/2016
2016	1886	SERVICE STATION	TESORO REFINING AND MARKETING CO.	824 IMPERIAL AVE.	CALEXICO	6/9/2016
2016	3246	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1791 MAGGIO ROAD	CALEXICO	6/8/2016
2016	413	SERVICE STATION	THE SOCO GROUP INC.	940 IMPERIAL AVE	CALEXICO	10/24/2016
2016	433	SERVICE STATION	THE SOCO GROUP INC.	1690 SO. 4TH ST.,	EL CENTRO	12/6/2016
2016	2368	SERVICE STATION	THE SOCO GROUP INC.	250 IMPERIAL AVE.,	CALEXICO	7/19/2016
2016	4124	SERVICE STATION	WORTHYS GAS	724 EMERSON	CALEXICO	6/14/2016
2016	4425	SOIL REMEDIATION	AQUA SCIENCE ENGINEERS, INC.	805 N. IMPERIAL AVE.	EL CENTRO	8/4/2016
2016	2545	SS CARDLOCK	McNEECE BROS OIL CO INC	591 E HEIL	EL CENTRO	1/27/2016
2016	2521	SS CARDLOCK	THE SOCO GROUP INC.	350 MAIN ST	EL CENTRO	6/8/2016
2016	3619	SS CARDLOCK	THE SOCO GROUP INC.	350 MAIN STREET	EL CENTRO	6/8/2016
2016	2662	STORAGE	US GYPSUM COMPANY	3810 EVEN HEWES HWY	EL CENTRO	2/23/2016
2016	2821	STORAGE	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	2/23/2016
2016	2828	STORAGE	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/23/2016
2016	4083	STORAGE	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	2/23/2016
2016	3074	WASTE DISPOSAL	I. C. PUBLIC WORKS	HWY 98, & NEW RIVER,	CALEXICO	2/10/2016
2016	2836	WASTE DISPOSAL	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	2/23/2016
2017	2240	AGGREGATE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN	EL CENTRO	9/21/2017
2017	4477	AGGREGATE	PYRAMID CONSTRUCTION AND AGGREGATES, INC.	839 DOGWOOD RD	HEBER	7/20/2017
2017	3582	ASPHALT	PYRAMID CONSTRUCTION	839 DOGWOOD RD.	HEBER	7/20/2017
2017	3758	ASPHALT	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST	CALEXICO	10/12/2017
2017	3637	BEEF FEEDLOT	BRANDENBERG FEED YARD	903 WEST HWY 98	CALEXICO	12/12/2017
2017	3638	BEEF FEEDLOT	EL TORO LAND & CATTLE CO., INC.	907 BROCKMAN ROAD	EL CENTRO	1/3/2018
2017	3650	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	495 W. HEBER ROAD	EL CENTRO	12/12/2017
2017	3652	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	910 NICHOLS ROAD	EL CENTRO	12/12/2017
2017	3669	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	96 E. FAWCETT	HEBER	12/12/2017
2017	3980	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	MCCABE FEEDLOT 1407 LA BRUCHERIE	EL CENTRO	12/21/2017
2017	4101	BEEF FEEDLOT	TAMARACK JB & SONS	1024 E HWY 98	CALEXICO	1/17/2017
2017	4513	COMBUSTIOIN	US GYPSUM COMPANY	3810 W. EVAN HEWES	EL CENTRO	2/21/2017

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	1130	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	2/21/2017
2017	1366	COMBUSTION	EL CENTRO REGIONAL MEDICAL CENTER	1415 ROSS AVE	EL CENTRO	3/13/2017
2017	2055	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	2/6/2017
2017	2486	COMBUSTION	CITY OF CALEXICO	298 E. ANZA RD	CALEXICO	2/6/2017
2017	2507	COMBUSTION	BRCS	1699 EAST CARR RD	CALEXICO	9/26/2017
2017	2524	COMBUSTION	CITY OF CALEXICO	V.V. WILLIAMS AVE	CALEXICO	2/24/2017
2017	2525	COMBUSTION	CITY OF CALEXICO WASTE WATER PLANT	545 PIERCE AVE	CALEXICO	2/21/2017
2017	2531	COMBUSTION	CITY OF EL CENTRO	2255 LA BRUCHERIE	EL CENTRO	6/14/2017
2017	2532	COMBUSTION	CITY OF EL CENTRO	1625 PICO ROAD	EL CENTRO	6/14/2017
2017	2534	COMBUSTION	CITY OF EL CENTRO	202 N. LABRUCHERIE	EL CENTRO	5/31/2017
2017	2535	COMBUSTION	CITY OF EL CENTRO	3010 SOUTH 8TH	EL CENTRO	5/31/2017
2017	2593	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	904 N. DOGWOOD RD	EL CENTRO	11/29/2017
2017	2631	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 524,528,564	EL CENTRO	10/2/2017
2017	2722	COMBUSTION	PACIFIC BELL TELEPHONE CO. dba AT & T	763 STATE STREET	EL CENTRO	10/24/2017
2017	2770	COMBUSTION	PACIFIC BELL CO. dba AT & T	100 W. SHERIDAN	CALEXICO	10/24/2017
2017	2789	COMBUSTION	NAVAL AIR FACILITY	RUNWAY 8,26,30 & 12	EL CENTRO	10/2/2017
2017	2811	COMBUSTION	US GYPSUM COMPANY	3810 W. HWY 80 PLASTER CITY	EL CENTRO	2/21/2017
2017	2864	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	3/15/2017
2017	2868	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	8/22/2017
2017	2935	COMBUSTION	FISHER WIRELESS SERVICES	703 LA BRUCHERIE	EL CENTRO	3/10/2017
2017	3011	COMBUSTION	LEVEL 3 COMMUNICATIONS,INC.	1198 INDUSTRY WAY	EL CENTRO	11/2/2017
2017	3015	COMBUSTION	I. C. PROPERTY SERVICES	328 APPLESTILL RD./SHERIFF	EL CENTRO	9/25/2017
2017	3061	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES	EL CENTRO	2/21/2017
2017	3084	COMBUSTION	CITY OF EL CENTRO POLICE DEPT	150 N 11TH ST	EL CENTRO	6/15/2017
2017	3090	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	2/5/2017
2017	3113	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 504	EL CENTRO	10/2/2017
2017	3139	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD	HEBER	1/25/2017
2017	3170	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	ZINETTA ROAD @ ALAMO RIVER	CALEXICO	4/3/2017
2017	3171	COMBUSTION	3E COMPANY/HOME DEPOT #1059	320 WAKE AVENUE	EL CENTRO	3/2/2017
2017	3195	COMBUSTION	CALIFORNIA HIGHWAY PATROL	1700 EAST CARR RD.	CALEXICO	9/19/2017
2017	3200	COMBUSTION	CITY OF CALEXICO FIRE DEPT.	430 E. 5TH ST.	CALEXICO	7/7/2017
2017	3204	COMBUSTION	CITY OF CALEXICO	608 HEBER AVE.	CALEXICO	2/23/2017
2017	3226	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	FIRE STATION #1,775 STATE	EL CENTRO	4/27/2017
2017	3227	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	900 S.DOGWOOD RD. STATION #2	EL CENTRO	4/27/2017
2017	3240	COMBUSTION	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	1990 HWY 111	EL CENTRO	5/9/2017
2017	3253	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	1597 E. HWY 98	CALEXICO	4/3/2017
2017	3265	COMBUSTION	SAN DIEGO GAS & ELECTRIC	4.5 MILES N. HWY 98	EL CENTRO	8/23/2017
2017	3295	COMBUSTION	TIME WARNER CABLE	747 EMERSON AVE.	CALEXICO	8/15/2017

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	3306	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	PERRY SUBSTATION SITE	CALEXICO	7/6/2017
2017	3319	COMBUSTION	TOYS R US	2600 ROCKWOOD AVE	CALEXICO	3/2/2017
2017	3320	COMBUSTION	I.C. FIRE DEPT.	1078 DOGWOOD ROAD	HEBER	4/28/2017
2017	3333	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1085 INGRAM AVE.	HEBER	1/27/2017
2017	3351	COMBUSTION	FMS EL CENTRO DIALYSIS	110 SOUTH 5TH ST.	EL CENTRO	5/25/2017
2017	3355	COMBUSTION	I. C. SHERIFFS DEPT.	328 APPLESTILL RD.	EL CENTRO	11/28/2017
2017	3360	COMBUSTION	ENTRAVISION COMMUNICATION	1803 N IMPERIAL AVENUE	EL CENTRO	7/20/2017
2017	3372	COMBUSTION	BRCS	200 E FIRST STREET	CALEXICO	9/26/2017
2017	3388	COMBUSTION	WAL-MART STORES,INC.#1859	2540 ROCKWOOD AVE	CALEXICO	8/8/2017
2017	3400	COMBUSTION	FLAT WEST WIRELESS, LLC/DBA CLEARTALK	1901 W. ADAMS AVENUE	EL CENTRO	12/20/2017
2017	3417	COMBUSTION	JC PENNY aba THE LAW CO.	3351 S. DOGWOOD	EL CENTRO	10/12/2017
2017	3420	COMBUSTION	IMPERIAL VALLEY MALL	3451 S. DOGWOOD RD.	EL CENTRO	10/12/2017
2017	3421	COMBUSTION	CITY OF EL CENTRO	2255 LABRUCHERIE ROAD	EL CENTRO	6/14/2017
2017	3422	COMBUSTION	SEARS, ROEBUCK AND CO	3751 S. DOGWOOD AVE	EL CENTRO	8/7/2017
2017	3426	COMBUSTION	DILLARDS DEPT. STORES	3451 S. DOGWOOD DR.	EL CENTRO	10/17/2017
2017	3428	COMBUSTION	LOWE'S INC.	2053 N. IMPERIAL AVENUE	EL CENTRO	2/7/2017
2017	3432	COMBUSTION	TARGET #1816	2295 N. IMPERIAL AVE.	EL CENTRO	2/7/2017
2017	3435	COMBUSTION	CITY OF CALEXICO	298 E. ANZA ROAD	CALEXICO	2/24/2017
2017	3438	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	904 DOGWOOD ROAD	EL CENTRO	11/29/2017
2017	3442	COMBUSTION	I. C. OFFICE OF EDUCATION	1398 SPERBER RD	EL CENTRO	4/24/2017
2017	3450	COMBUSTION	MACYS, INC.	3551 S. DOGWOOD RD.	EL CENTRO	5/8/2017
2017	3468	COMBUSTION	VALLEY ENDOSCOPY CENTER	1550 N. IMPERIAL AVE. SPACE 3	EL CENTRO	1/24/2017
2017	3558	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	1/25/2017
2017	3635	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	1651 W. MAIN STREET	EL CENTRO	3/28/2017
2017	3674	COMBUSTION	AUTHORITY (IVECA)	1141 E. HWY 98	CALEXICO	11/28/2017
2017	3690	COMBUSTION	I.C. PLANNING & DEVELOPMENT SERVICES	801 MAIN STREET	EL CENTRO	9/21/2017
2017	3700	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE/VARIOUS	CALEXICO	2/21/2017
2017	3753	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD ROAD	HEBER	1/26/2017
2017	3759	COMBUSTION	FRANK KALINOWSKI	602 E. ROSS AVENUE	EL CENTRO	7/19/2017
2017	3787	COMBUSTION	AT & T CORPORATION	227 AVENIDA CAMPILLO	CALEXICO	11/20/2017
2017	3806	COMBUSTION	SUN COMMUNITY FEDERAL CREDIT UNION	1068 BROADWAY	EL CENTRO	6/15/2017
2017	3883	COMBUSTION	FAA/IMPERIAL VOR FACILITY	305 E. MCCABE ROAD	EL CENTRO	12/6/2017
2017	3898	COMBUSTION	SAM BIRDSONG	1112 W. EVAN HEWES HWY	EL CENTRO	10/31/2017
2017	3915	COMBUSTION	FRESENIUS MDEDICAL CARE -IC	200 WAKE AVENUE	EL CENTRO	5/25/2017
2017	3916	COMBUSTION	CITY OF EL CENTRO.	3RD ST. & COMMERICAL	EL CENTRO	6/14/2017
2017	3917	COMBUSTION	CITY OF EL CENTRO	1101 DANENBERG DRIVE	EL CENTRO	5/31/2017
2017	3943	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	1115 N. IMPERIAL AVENUE	EL CENTRO	8/2/2017
2017	3949	COMBUSTION	WEST COURTHOUSE, LLC	2003 W. ADAMS AVE	EL CENTRO	9/19/2017

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	3973	COMBUSTION	CITY OF CALEXICO	1650 COLE ROAD	CALEXICO	2/23/2017
2017	3974	COMBUSTION	CITY OF CALEXICO/WTP	545 PIERCE AVENUE	CALEXICO	2/21/2017
2017	3981	COMBUSTION	HEBER FIELD COMPANY	855 DOGWOOD ROAD	HEBER	3/30/2017
2017	3984	COMBUSTION	CLINICAS DE SALUD DEL PUEBLO, INC.	223 WEST COLE	CALEXICO	3/31/2017
2017	3991	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	9/28/2017
2017	3994	COMBUSTION	CITY OF EL CENTRO	375 S. FIRST STREET	EL CENTRO	5/30/2017
2017	4016	COMBUSTION	VALLEY CONVALESCENT CENTER	1700 SOUTH IMPERIAL AVE.	EL CENTRO	2/7/2014
2017	4035	COMBUSTION	IMPERIAL COUNTY PUBLIC HEALTH DEPARTMENT	935 BROADWAY STREET	EL CENTRO	10/5/2017
2017	4104	COMBUSTION	MCCABE UNION SCHOOL DISTRICT	701 WEST MCCABE ROAD	EL CENTRO	9/21/2017
2017	4149	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	9/28/2017
2017	4158	COMBUSTION	CUSTOMS ENFORCEMENT	1115 N. IMPERIAL	EL CENTRO	8/1/2017
2017	4163	COMBUSTION	TOWN PLACE SUITES EL CENTRO	3003 S DOGWOOD RD.	EL CENTRO	8/23/2017
2017	4164	COMBUSTION	CITY OF CALEXICO	PORTICO BLVD. & ROBINSON AVE.	CALEXICO	12/19/2017
2017	4197	COMBUSTION	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST.	CALEXICO	12/14/2017
2017	4206	COMBUSTION	CITY OF EL CENTRO	1910 WATERMAN AVE.	EL CENTRO	3/6/2017
2017	4214	COMBUSTION	CITY OF CALEXICO	VARIOUS LOCATIONS	CALEXICO	2/24/2017
2017	4221	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	1/26/2017
2017	4255	COMBUSTION	FMC CALEXICO	351 BIRCH STREET	CALEXICO	5/25/2017
2017	4258	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE. CALEXICO	CALEXICO	2/24/2017
2017	4284	COMBUSTION	NAF-DEFENSE COMMISSARY AGENCY DECA	NAF BLD. 210	EL CENTRO	10/2/2017
2017	4286	COMBUSTION	SILVER RIDGE POWER	251 FERRELL ROAD	CALEXICO	3/17/2017
2017	4294	COMBUSTION	EL TORO LAND & CATTLE CO.	96 FAWCETT	HEBER	9/5/2017
2017	4304	COMBUSTION	SAN DIEGO GAS & ELECTRIC	1505 W. HWY 98	CALEXICO	8/23/2017
2017	4326	COMBUSTION	MOUNT SIGNAL SOLAR FARM 1	251 FERREL ROAD	CALEXICO	3/17/2017
2017	4338	COMBUSTION	ZAYO GROUP LLC	3810 W. EVAN HEWES HWY	EL CENTRO	10/24/2017
2017	4347	COMBUSTION	CSOLAR IV WEST, LLC	12.3 MILES W OF EL CENTRO	EL CENTRO	10/26/2017
2017	4358	COMBUSTION	MANAGEMENT & TRAINING CORPORATION	1499 STATE HIGHWAY 98	CALEXICO	9/19/2017
2017	4381	COMBUSTION	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	W HEBER RD. & CA-7	HEBER	7/19/2017
2017	4388	COMBUSTION	NEW CINGULAR WIRELESS PCS, LLC dba AT & T MOBILITY	429 "B EAST HEBER ROAD	HEBER	10/23/2017
2017	4392	COMBUSTION	KXO, INC.	102 W. VILLA ROAD	EL CENTRO	6/7/2017
2017	4411	COMBUSTION	CALTRANS EL CENTRO	1102 MONTENEGRO WAY	EL CENTRO	7/21/2017
2017	4454	COMBUSTION	PYRAMID CONSTRUCTION AND AGGREGATES, INC.	VARIOUS	HEBER	ATC
2017	4488	COMBUSTION	CHARTER COMMUNICATIONS	747 EMERSON AVENUE	CALEXICO	ATC
2017	4502	COMBUSTION	TIME WARNER CABLE PACIFIC WEST LLC	747 EMERSON AVENUE	CALEXICO	8/15/2017
2017	4513	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES	EL CENTRO	2/21/2017
2017	4337	COMPOST	SPREADCO, INC.	910 NICHOLS ROAD	EL CENTRO	9/25/2017
2017	4462	COMPOST	TRUSOURCE, LLC	96 E. FAWCETT ROAD	HEBER	9/5/2017
2017	564	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN ST	EL CENTRO	11/8/2017

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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	1065	CONCRETE	HALLIBURTON ENERGY SERVICES	801 SO. 2ND ST.	EL CENTRO	11/28/2017
2017	2230	CONCRETE	CEMEX CONSTRUCTION MATERIALS PACIFIC, LLC	550 E. MAIN STREET	EL CENTRO	4/3/2017
2017	2373	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN	EL CENTRO	12/11/2017
2017	3112	CONCRETE	GIBSON & SCHAEFER, INC	1143 ROCKWOOD RD	HEBER	12/7/2017
2017	2663	CUTTING	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/21/2017
2017	2292	DRY CLEANER	MODERN CLEANERS	168 E. COLE ROAD STE. 12	CALEXICO	1/17/2017
2017	3321	DRY CLEANER	VALLEY DRY CLEANING	1480 S. 4TH STREET	EL CENTRO	1/9/2017
2017	1500	GEOTHERMAL	HEBER FIELD COMPANY	895 PITZER ROAD	HEBER	3/30/2017
2017	1641	GEOTHERMAL	HEBER GEOTHERMAL COMPANY (HGC)	895 PITZER ROAD	HEBER	3/30/2017
2017	1649	GEOTHERMAL	HEBER FIELD COMPANY	947 DOGWOOD RD.	HEBER	3/30/2017
2017	1801	GEOTHERMAL	HEBER FIELD COMPANY	GTW 4	HEBER	3/30/2017
2017	1802	GEOTHERMAL	HEBER FIELD COMPANY	GTW 6	HEBER	3/30/2017
2017	2217	GEOTHERMAL	HEBER-SECOND IMPERIAL GEOTHERMAL COMPANY SIGC	855 DOGWOOD ROAD	HEBER	3/30/2017
2017	2231	GEOTHERMAL	HEBER FIELD COMPANY	DOGWOOD RD	HEBER	3/30/2017
2017	2257	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	3/30/2017
2017	2258	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	3/30/2017
2017	2369	HAY COMPRESSING	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	10/16/2017
2017	2405	HAY COMPRESSING	KUHN HAY	1880 JEFFREY RD	EL CENTRO	8/14/2017
2017	2696	HAY COMPRESSING	EL TORO EXPORT	1469 LA BRUCHERIE RD	EL CENTRO	9/19/2017
2017	3164	HAY COMPRESSING	K & M PRESS, INC.	1490 W. EVAN HEWES	EL CENTRO	3/12/2017
2017	1632	INCINERATOR	CBP	200 E. FIRST STREET	CALEXICO	3/17/2017
2017	2196	INCINERATOR	HEMS BROTHERS MORTUARY	1975 S. 4TH ST	EL CENTRO	11/28/2017
2017	1648	MANUFACTURING	WILBUR ELLIS COMPANY	45 W. DANENBERG ROAD	EL CENTRO	7/18/2017
2017	1696	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD ST,	EL CENTRO	5/1/2017
2017	2173	MANUFACTURING	MULHERIN MONUMENTAL COMPANY	1000 S. 2ND ST	EL CENTRO	3/9/2017
2017	2569	MANUFACTURING	BULL HOLDING, CORP	1701 BOWKER RD.	EL CENTRO	10/13/2017
2017	2735	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/21/2017
2017	3511	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY. 80	EL CENTRO	2/21/2017
2017	3542	MANUFACTURING	US GYPSUM COMPANY	3810N W. HWY 80	EL CENTRO	2/21/2017
2017	3921	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD STREET	EL CENTRO	5/1/2017
2017	4138	MANUFACTURING	AMETZA, LLC	1520 FORRESTER ROAD	EL CENTRO	8/14/2017
2017	2558	MILLING	ALLSTAR SEED COMPANY	2015 SILSBEE RD.	EL CENTRO	10/16/2017
2017	2700	MILLING	SEEDS WEST INC	202 E. ROSS AVE	EL CENTRO	7/6/2017
2017	3109	MILLING	US GYPSUM COMPANY	3810 W. EVAN HEWES	EL CENTRO	2/27/2017
2017	4205	NON RETAIL SS	CITY OF EL CENTRO	1910 N. WATERMAN AVE.	EL CENTRO	3/6/2017
2017	4481	NON RETAIL SS	CALIFORNIA DEPARTMENT OF TRANSPORTATION	1102 MONTENEGRO WAY	EL CENTRO	12/1/2017
2017	2212	NON-RETAIL SS	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	11/3/2017
2017	2626	NON-RETAIL SS	CITY OF CALEXICO	640 PIERCE	CALEXICO	8/2/2017

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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	3607	NON-RETAIL SS	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	1/13/2017
2017	3971	NON-RETAIL SS	LA BRUCHERIE PRODUCE, LLC	1407 S. LABRUCHERIE ROAD	EL CENTRO	7/24/2017
2017	4266	NON-RETAIL SS	CALEXICO UNIFIED SCHOOL DISTRICT	1085 ANDRADE AVENUE	CALEXICO	7/7/2017
2017	4310	NON-RETAIL SS	U.S. CBP, OFFICE OF BORDER PATROL, CALEXICO STATION	536 BARBARA WORTH RD.	CALEXICO	9/28/2017
2017	4432	NON-RETAILL SS	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	HEBER DUNES	HEBER	12/18/2017
2017	4457	NON-RETAILL SS	IMPERIAL TARP & COVERS, INC.	104 E. MCCABE RD	EL CENTRO	7/6/2017
2017	1667	PAINT BOOTH	NAVAL AIR FACILITY	BLDG #508	EL CENTRO	9/13/2017
2017	2278	PAINT BOOTH	EL CENTRO BODY SHOP	240 SOUTH 3RD ST	EL CENTRO	1/10/2017
2017	2303	PAINT BOOTH	MODERN PAINT & BODY SHOP	830 STATE ST	EL CENTRO	9/12/2017
2017	2311	PAINT BOOTH	CALIBER COLLISION CENTER	503 E. MAIN STREET	EL CENTRO	8/15/2017
2017	2541	PAINT BOOTH	NICE & EASY	400 EMERSON	CALEXICO	1/23/2017
2017	3151	PAINT BOOTH	GUADALUPE MORENO	602 E. MAIN ST	EL CENTRO	1/9/2017
2017	3220	PAINT BOOTH	ESCOBEDO PAINT & BODY SHOP	361 E MAIN STREET	EL CENTRO	8/31/2017
2017	3375	PAINT BOOTH	DOGWOOD AUTO BODY INC.	456 E. STATE STREET	EL CENTRO	6/22/2017
2017	3477	PAINT BOOTH	LUDWIG'S AUTO BODY	751 EAST MAIN ST	EL CENTRO	1/10/2017
2017	3775	PAINT BOOTH	STANS AUTO BODY	1880 W. EUCLID AVE	EL CENTRO	8/3/2017
2017	3800	PAINT BOOTH	HI-TECK AUTO BODY	799 E. MAIN STREET	EL CENTRO	10/16/2017
2017	3887	PAINT BOOTH	OSCAR HERNANDEZ BODY SHOP	555 CESAR CHAVEZ BLVD	CALEXICO	CLOSED
2017	4108	PAINT BOOTH	TORRES BODY SHOP	700 PIERCE AVE.	CALEXICO	1/23/2017
2017	4161	PAINT BOOTH	MIKES PAINT AND BODY	1309 ESTRADA BLVD	CALEXICO	3/13/2017
2017	4243	PAINT BOOTH	CESARS BODY SHOP	202 S. 3RD STREET	EL CENTRO	10/9/2017
2017	4246	PAINT BOOTH	MANDYS AUTO BODY	565 SCARONI RD	CALEXICO	1/6/2017
2017	4459	PAINT BOOTH	CRIS BODY SHOP	571 SCARIONI RD	CALEXICO	4/4/2017
2017	4471	PAINT BOOTH	PRO 1 COLLISION CENTER	345 W. STATE STREET	EL CENTRO	8/3/2017
2017	4103	PAINT BOOTH	MOLES GARAGE	699 BROADWAY STREET	EL CENTRO	2/23/2017
2017	4372	PAINTBOOTH	HALF BAKED POWDERCOATING	1099 INDUSTRY WAY, STE. F	EL CENTRO	5/11/2017
2017	4449	PAINTBOOTH	TOMS AUTO BODY	1761 W. ADAMS AVE.	EL CENTRO	5/2/2017
2017	2187	PAINTING	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	3/28/2017
2017	539	PETRO. STORAGE	CALTRANS	1605 W. ADAMS	EL CENTRO	11/13/2017
2017	634	PETRO. STORAGE	I. C. PUBLIC WORKS	HEBER ROAD YARD	HEBER	5/23/2017
2017	3323	PETRO. STORAGE	SMD LOGISTICS, INC.	101 E. MAIN ST	HEBER	8/19/2017
2017	3570	PETRO. STORAGE	CITY OF CALEXICO	801 W. 2ND STREET	CALEXICO	7/12/2017
2017	3584	PETRO. STORAGE	BEN ABATTI FARMS	204 E. MCCABE RD.	EL CENTRO	12/1/2017
2017	1156	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA UNIT 4	EL CENTRO	3/15/2017
2017	2152	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 VILLA RD unit 2	EL CENTRO	3/15/2017
2017	3964	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA ROAD	EL CENTRO	3/15/2017
2017	2359	SANDBLASTING	NAVAL AIR FACILITY	BLDG 508/PWC NAF	EL CENTRO	9/13/2017
2017	2416	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	3/15/2017

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	2551	SANDBLASTING	WYMORE, INC.	697 S. DOGWOOD RD	EL CENTRO	7/10/2017
2017	2693	SANDBLASTING	EW CORPORATION	1002 EAST MAIN STREET	EL CENTRO	5/23/2017
2017	2958	SANDBLASTING	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN STREET	EL CENTRO	5/31/2017
2017	4248	SANDBLASTING	COMPLETE METAL FABRICATION, INC.	596 E MAIN STREET	EL CENTRO	7/10/2017
2017	4379	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	HWY 98 & E. HIGHLINE	CALEXICO	3/24/2017
2017	4406	SANDBLASTING	HAZARD CONSTRUCTION CO.	395 E. AURORA AVE	EL CENTRO	9/15/2017
2017	4447	SANDBLASTING	DAMMARELL INDUSTRIES	104 E. MCCABE RD.	EL CENTRO	3/22/2017
2017	399	SERVICE STATION	ANTUNEZ SHELL	500 IMPERIAL	CALEXICO	1/12/2017
2017	400	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1302 S. IMPERIAL AVE.	EL CENTRO	5/23/2017
2017	413	SERVICE STATION	THE SOCO GROUP INC.	940 IMPERIAL AVE	CALEXICO	10/19/2017
2017	433	SERVICE STATION	THE SOCO GROUP INC.	1690 SO. 4TH ST.,	EL CENTRO	12/4/2017
2017	463	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1036 IMPERIAL AVE.	CALEXICO	10/19/2017
2017	476	SERVICE STATION	BHAGVATI CORPORATION	1850 SO.IMPERIAL	EL CENTRO	2/10/2017
2017	488	SERVICE STATION	AMERI MEX SERVICES, INC. DBA DSM FUEL STOPS	2115 S 4TH ST.	EL CENTRO	10/27/2017
2017	735	SERVICE STATION	7-ELEVEN, INC.	815 ADAMS	EL CENTRO	1/6/2017
2017	1161	SERVICE STATION	TESORO WEST COAST COMPANY, LLC	960 N. IMPERIAL AVE.	EL CENTRO	2/22/2017
2017	1398	SERVICE STATION	7-ELEVEN, INC.	2050 S. 4TH	EL CENTRO	5/3/2017
2017	1399	SERVICE STATION	7-ELEVEN, INC.	1485 OCOTILLO	EL CENTRO	11/29/2017
2017	1549	SERVICE STATION	7-ELEVEN, INC.	904 IMPERIAL AVE	CALEXICO	11/30/2017
2017	1665	SERVICE STATION	KENNEDY MARKET	70 E. MAIN ST.	HEBER	8/14/2017
2017	1686	SERVICE STATION	NAVAL AIR FACILITY	BLDG. 200 JETMART A ST.	EL CENTRO	8/17/2017
2017	1748	SERVICE STATION	7-ELEVEN, INC.	485 E. MAIN STREET	EL CENTRO	2/9/2017
2017	1886	SERVICE STATION	TESORO REFINING AND MARKETING CO.	824 IMPERIAL AVE.	CALEXICO	6/7/2017
2017	1988	SERVICE STATION	TESORO REFINING & MARKETING CO., LLC	444 S. IMPERIAL	CALEXICO	6/5/2017
2017	2071	SERVICE STATION	THE GORE GROUP ENTERPRISE, INC.	1499 WEST MAIN ST.	EL CENTRO	4/13/2017
2017	2081	SERVICE STATION	ARCO AM PM/NAS, LLC	1025 KLOKE RD	CALEXICO	4/5/2017
2017	2129	SERVICE STATION	7-ELEVEN #39518A	2420 S. 4TH ST	EL CENTRO	12/7/2017
2017	2159	SERVICE STATION	SUPER STOP TRAVEL CENTER	550 WAKE AVE.	EL CENTRO	6/5/2017
2017	2167	SERVICE STATION	EL CENTRO CORNER INC. dba ARCO AM PM 82300	398 AURORA DRIVE	EL CENTRO	2/17/2017
2017	2316	SERVICE STATION	APRO, LLC dba MY GOODS MARKET # 1444	525 N. LABRUCHERIE	EL CENTRO	11/9/2017
2017	2349	SERVICE STATION	HANAA DEVELOPMENT , LLC	105 W. COLE BLVD.	CALEXICO	4/3/2017
2017	2368	SERVICE STATION	THE SOCO GROUP INC.	250 IMPERIAL AVE.,	CALEXICO	7/17/2017
2017	2390	SERVICE STATION	7-ELEVEN, INC.	168 E. COLE RD	CALEXICO	1/17/2017
2017	2505	SERVICE STATION	McNEECE BROS OIL CO INC	478 E. MAIN	EL CENTRO	10/11/2017
2017	2769	SERVICE STATION	COSTCO #121	2030 N. IMPERIAL	EL CENTRO	5/18/2017
2017	3246	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1791 MAGGIO ROAD	CALEXICO	6/6/2017
2017	3255	SERVICE STATION	ReEM CORPORATION dba FILLCO	324 IMPERIAL AVE	CALEXICO	3/7/2017
2017	3256	SERVICE STATION	RFH CORPORATION	1011 IMPERIAL AVE.	CALEXICO	1/17/2017

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2017	3270	SERVICE STATION	MY MIHAN INC/DBA MUZZ PETROLEUM	1098 COLE ROAD	CALEXICO	4/24/2017
2017	3278	SERVICE STATION	GASTRAK OF CALEXICO, LLC	435 S MENVILLE RD.	CALEXICO	10/4/2017
2017	3347	SERVICE STATION	CALEXICO OIL CORPORATION	832 BIRCH ST	CALEXICO	4/6/2017
2017	3626	SERVICE STATION	J.A.G. CAPITAL INVESTMENTS, INC DBA FILLCO	1302 S. 4TH STREET	EL CENTRO	12/26/2017
2017	3686	SERVICE STATION	EL CENTRO CORNER INC. AM/PM #82642	3603 S. DOGWOOD	EL CENTRO	11/10/2017
2017	3742	SERVICE STATION	HRS VENTURES/RODILES	1498 COLE BLVD	CALEXICO	12/8/2017
2017	4095	SERVICE STATION	PACIFICLAND INTERNATIONAL DEVELOPMENT, INC.	1105 YOURMAN ROAD	HEBER	7/12/2017
2017	4124	SERVICE STATION	NORTH COUNTY INVESTMENTS DBA SKY FUEL	724 EMERSON	CALEXICO	10/18/2017
2017	4125	SERVICE STATION	7-ELEVEN INC.	1101 ANDRADE AVE.	CALEXICO	3/15/2017
2017	4425	SOIL REMEDIATION	AQUA SCIENCE ENGINEERS, INC.	805 N. IMPERIAL AVE.	EL CENTRO	1/17/2017
2017	2521	SS CARDLOCK	THE SOCO GROUP INC.	350 MAIN ST	EL CENTRO	11/22/2017
2017	2545	SS CARDLOCK	McNEECE BROS OIL CO INC	591 E HEIL	EL CENTRO	1/18/2017
2017	3619	SS CARDLOCK	THE SOCO GROUP INC.	350 MAIN STREET	EL CENTRO	9/26/2017
2017	2662	STORAGE	US GYPSUM COMPANY	3810 EVEN HEWES HWY	EL CENTRO	2/21/2017
2017	2821	STORAGE	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	2/21/2017
2017	2828	STORAGE	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/21/2017
2017	4083	STORAGE	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	2/21/2017
2017	2836	WASTE DISPOSAL	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	2/21/2017
2017	3074	WASTE DISPOSAL	I. C. PUBLIC WORKS	HWY 98, & NEW RIVER,	CALEXICO	1/25/2017
2017	3076	WASTE DISPOSAL	I. C. PUBLIC WORKS	WORTHINGTON RD W OF IMPERIAL	EL CENTRO	6/13/2017
2018	2240	AGGREGATE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN	EL CENTRO	ATC
2018	3582	ASPHALT	PYRAMID CONSTRUCTION	839 DOGWOOD RD.	HEBER	9/27/2018
2018	3758	ASPHALT	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST	CALEXICO	9/25/2018
2018	3980	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	MCCABE FEEDLOT 1407 LA BRUCHERIE	EL CENTRO	11/28/2018
2018	3650	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	495 W. HEBER ROAD	EL CENTRO	11/27/2018
2018	3652	BEEF FEEDLOT	PHILLIPS CATTLE COMPANY	910 NICHOLS ROAD	EL CENTRO	11/27/2018
2018	3669	BEEF FEEDLOT	EL TORO LAND & CATTLE CO.	96 E. FAWCETT	HEBER	11/14/2018
2018	3638	BEEF FEEDLOT	EL TORO LAND & CATTLE CO., INC.	907 BROCKMAN ROAD	EL CENTRO	11/14/2018
2018	3637	BEEF FEEDLOT	MOOLANE RANCH	903 WEST HWY 98	CALEXICO	3/20/2018
2018	4101	BEEF FEEDLOT	TAMARACK JB & SONS	1024 E HWY 98	CALEXICO	2/6/2018
2018	4526	COMBUSTION	CLX WEST V/P	200 EAST 1ST. STREET	CALEXICO	ATC
2018	3265	COMBUSTION	SAN DIEGO GAS & ELECTRIC	4.5 MILES N. HWY 98	EL CENTRO	12/11/2018
2018	4304	COMBUSTION	SAN DIEGO GAS & ELECTRIC	1505 W. HWY 98	CALEXICO	12/11/2018
2018	3388	COMBUSTION	WAL-MART STORES,INC.#1859	2540 ROCKWOOD AVE	CALEXICO	12/6/2018
2018	3883	COMBUSTION	FAA/IMPERIAL VOR FACILITY	305 E. MCCABE ROAD	EL CENTRO	11/28/2018
2018	3674	COMBUSTION	AUTHORITY (IVECA)	1141 E. HWY 98	CALEXICO	11/28/2018
2018	3355	COMBUSTION	I. C. SHERIFFS DEPT.	328 APPLESTILL RD.	EL CENTRO	11/27/2018
2018	3898	COMBUSTION	SAM BIRDSONG	1112 W. EVAN HEWES HWY	EL CENTRO	11/26/2018

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	4284	COMBUSTION	Defense Commissary Agency	NAF BLD. 210	EL CENTRO	10/30/2018
2018	4163	COMBUSTION	TOWN PLACE SUITES EL CENTRO	3003 S DOGWOOD RD.	EL CENTRO	10/30/2018
2018	2868	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	10/29/2018
2018	3438	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	904 DOGWOOD ROAD	EL CENTRO	10/29/2018
2018	2631	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 524,528,564	EL CENTRO	10/29/2018
2018	2789	COMBUSTION	NAVAL AIR FACILITY	RUNWAY 8,26,30 & 12	EL CENTRO	10/29/2018
2018	3113	COMBUSTION	NAVAL AIR FACILITY	2200 BENNETT RD. BLDG. 504	EL CENTRO	10/29/2018
2018	4388	COMBUSTION	NEW CINGULAR WIRELESS PCS, LLC dba AT & T MOBILITY	429 "B EAST HEBER ROAD	HEBER	10/16/2018
2018	3787	COMBUSTION	AT & T CORPORATION	227 AVENIDA CAMPILLO	CALEXICO	10/11/2018
2018	2770	COMBUSTION	PACIFIC BELL CO. dba AT & T	100 W. SHERIDAN	CALEXICO	10/8/2018
2018	2722	COMBUSTION	PACIFIC BELL TELEPHONE CO. dba AT & T	763 STATE STREET	EL CENTRO	10/8/2018
2018	3435	COMBUSTION	CITY OF CALEXICO	298 E. ANZA ROAD	CALEXICO	10/2/2018
2018	3991	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	9/24/2018
2018	4149	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	536 BARBARA WORTH	CALEXICO	9/24/2018
2018	2507	COMBUSTION	BRCS	1699 EAST CARR RD	CALEXICO	9/12/2018
2018	3372	COMBUSTION	BRCS	200 E FIRST STREET	CALEXICO	9/12/2018
2018	3420	COMBUSTION	IMPERIAL VALLEY MALL	3451 S. DOGWOOD RD.	EL CENTRO	9/10/2018
2018	3417	COMBUSTION	JC PENNY aba THE LAW CO.	3351 S. DOGWOOD	EL CENTRO	9/10/2018
2018	3422	COMBUSTION	SEARS, ROEBUCK AND CO	3751 S. DOGWOOD AVE	EL CENTRO	9/10/2018
2018	3426	COMBUSTION	DILLARDS DEPT. STORES	3451 S. DOGWOOD DR.	EL CENTRO	8/29/2018
2018	3949	COMBUSTION	WEST COURTHOUSE, LLC	2003 W. ADAMS AVE	EL CENTRO	8/29/2018
2018	3333	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1085 INGRAM AVE.	HEBER	8/27/2018
2018	4338	COMBUSTION	ZAYO GROUP LLC	3810 W. EVAN HEWES HWY	EL CENTRO	8/27/2018
2018	3690	COMBUSTION	I. C. PLANNING & DEVELOPMENT	801 MAIN STREET	EL CENTRO	8/23/2018
2018	4104	COMBUSTION	MCCABE UNION SCHOOL DISTRICT	701 WEST MCCABE ROAD	EL CENTRO	8/23/2018
2018	4392	COMBUSTION	KXO, INC.	102 W. VILLA ROAD	EL CENTRO	8/16/2018
2018	3450	COMBUSTION	MACYS, INC.	3551 S. DOGWOOD RD.	EL CENTRO	8/16/2018
2018	4381	COMBUSTION	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	W. HEBER RD. & CA-7	HEBER	8/13/2018
2018	3195	COMBUSTION	CALIFORNIA HIGHWAY PATROL	1700 EAST CARR RD.	CALEXICO	8/13/2018
2018	4535	COMBUSTION	CENTRAL UNION HIGH SCHOOL	1001 S. STREET	EL CENTRO	8/9/2018
2018	4558	COMBUSTION	GREENFIX AMERICA, LLC	255 EAST COMMERCIAL AVE	EL CENTRO	8/9/2018
2018	4035	COMBUSTION	I. C. PUBLIC HEALTH DEPARTMENT	935 BROADWAY STREET	EL CENTRO	8/7/2018
2018	4358	COMBUSTION	MANAGEMENT & TRAINING CORPORATION	1499 STATE HIGHWAY 98	CALEXICO	8/7/2018
2018	4164	COMBUSTION	CITY OF CALEXICO	PORTICO BLVD. & ROBINSON AVE.	CALEXICO	8/1/2018
2018	4214	COMBUSTION	CITY OF CALEXICO	VARIOUS LOCATIONS	CALEXICO	8/1/2018
2018	4347	COMBUSTION	CSOLAR IV WEST, LLC	12.3 MILES W OF EL CENTRO	EL CENTRO	8/1/2018
2018	3226	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	FIRE STATION #1,775 STATE	EL CENTRO	7/17/2018
2018	3227	COMBUSTION	CITY OF EL CENTRO - FIRE DEPT.	900 S.DOGWOOD RD. STATION #2	EL CENTRO	7/17/2018

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	4255	COMBUSTION	FMC CALEXICO	351 BIRCH STREET	CALEXICO	7/16/2018
2018	3351	COMBUSTION	FMS EL CENTRO DIALYSIS	110 SOUTH 5TH ST.	EL CENTRO	7/16/2018
2018	3915	COMBUSTION	FRESENIUS MDEDICAL CARE -IC	200 WAKE AVENUE	EL CENTRO	7/16/2018
2018	3011	COMBUSTION	LEVEL 3 COMMUNICATIONS,INC.	1198 INDUSTRY WAY	EL CENTRO	7/15/2018
2018	4326	COMBUSTION	MOUNT SIGNAL SOLAR FARM 1	251 FERREL ROAD	CALEXICO	7/12/2018
2018	4286	COMBUSTION	SILVER RIDGE POWER	251 FERRELL ROAD	CALEXICO	7/12/2018
2018	4411	COMBUSTION	CALTRANS EL CENTRO	1102 MONTENEGRO WAY	EL CENTRO	6/28/2018
2018	3240	COMBUSTION	CELLCO PARTNERSHIP DBA VERIZON WIRELESS	1990 HWY 111	EL CENTRO	6/27/2018
2018	3759	COMBUSTION	FRANK KALINOWSKI	602 E. ROSS AVENUE	EL CENTRO	6/25/2018
2018	4197	COMBUSTION	AGGREGATE PRODUCTS INC.	430 PAN AMERICAN ST.	CALEXICO	6/20/2018
2018	3204	COMBUSTION	CITY OF CALEXICO	608 HEBER AVE.	CALEXICO	6/18/2018
2018	3200	COMBUSTION	CITY OF CALEXICO FIRE DEPT.	415 4TH STREET	CALEXICO	5/24/2018
2018	3984	COMBUSTION	CLINICAS DE SALUD DEL PUEBLO, INC.	223 WEST COLE	CALEXICO	5/24/2018
2018	3306	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	PERRY SUBSTATION SITE	CALEXICO	5/22/2018
2018	3295	COMBUSTION	TIME WARNER CABLE	747 EMERSON AVE.	CALEXICO	5/21/2018
2018	3360	COMBUSTION	ENTRAVISION COMMUNICATION	1803 N IMPERIAL AVENUE	EL CENTRO	5/2/2018
2018	3635	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	1651 W. MAIN STREET	EL CENTRO	4/18/2018
2018	2935	COMBUSTION	FISHER WIRELESS SERVICES	703 LA BRUCHERIE	EL CENTRO	4/6/2018
2018	3994	COMBUSTION	CITY OF EL CENTRO	375 S. FIRST STREET	EL CENTRO	4/4/2018
2018	3084	COMBUSTION	CITY OF EL CENTRO POLICE DEPT	150 N 11TH ST	EL CENTRO	4/4/2018
2018	3806	COMBUSTION	SUN COMMUNITY FEDERAL CREDIT UNION	1068 BROADWAY	EL CENTRO	4/4/2018
2018	2531	COMBUSTION	CITY OF EL CENTRO	2255 LA BRUCHERIE	EL CENTRO	3/29/2018
2018	3421	COMBUSTION	CITY OF EL CENTRO	2255 LABRUCHERIE ROAD	EL CENTRO	3/29/2018
2018	2532	COMBUSTION	CITY OF EL CENTRO	1625 PICO ROAD	EL CENTRO	3/28/2018
2018	4556	COMBUSTION	CITY OF EL CENTRO	1661 LABRUCHERIE ROAD	EL CENTRO	3/28/2018
2018	3916	COMBUSTION	CITY OF EL CENTRO.	3RD ST. & COMMERICAL	EL CENTRO	3/28/2018
2018	3981	COMBUSTION	HEBER FIELD COMPANY	855 DOGWOOD ROAD	HEBER	3/27/2018
2018	3700	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE/VARIOUS	CALEXICO	3/19/2018
2018	3320	COMBUSTION	I. C. FIRE DEPT.	1078 DOGWOOD ROAD	HEBER	3/19/2018
2018	2864	COMBUSTION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	3/16/2018
2018	3442	COMBUSTION	I. C. OFFICE OF EDUCATION	1398 SPERBER RD	EL CENTRO	3/15/2018
2018	3319	COMBUSTION	TOYS R US	2600 ROCKWOOD AVE	CALEXICO	3/13/2018
2018	2524	COMBUSTION	CITY OF CALEXICO	V.V. WILLIAMS AVE	CALEXICO	3/9/2018
2018	3973	COMBUSTION	CITY OF CALEXICO	1650 COLE ROAD	CALEXICO	3/9/2018
2018	4258	COMBUSTION	CITY OF CALEXICO	545 PIERCE AVE. CALEXICO	CALEXICO	3/9/2018
2018	3974	COMBUSTION	CITY OF CALEXICO/WTP	545 PIERCE AVENUE	CALEXICO	3/9/2018
2018	3015	COMBUSTION	I. C. PROPERTY SERVICES	328 APPLESTILL ROAD	EL CENTRO	3/7/2018
2018	3917	COMBUSTION	CITY OF EL CENTRO	1101 DANENBERG DRIVE	EL CENTRO	3/6/2018

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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	2534	COMBUSTION	CITY OF EL CENTRO	202 N. LABRUCHERIE	EL CENTRO	3/6/2018
2018	2535	COMBUSTION	CITY OF EL CENTRO	3010 SOUTH 8TH	EL CENTRO	3/6/2018
2018	2525	COMBUSTION	CITY OF CALEXICO WASTE WATER PLANT	545 PIERCE AVE	CALEXICO	2/27/2018
2018	1366	COMBUSTION	EL CENTRO REGIONAL MEDICAL CENTER	1415 ROSS AVE	EL CENTRO	2/20/2018
2018	1130	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	2/15/2018
2018	2811	COMBUSTION	US GYPSUM COMPANY	3810 W. HWY 80 PLASTER CITY	EL CENTRO	2/15/2018
2018	3061	COMBUSTION	US GYPSUM COMPANY	3810 W EVAN HEWES	EL CENTRO	2/15/2018
2018	3753	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD ROAD	HEBER	2/13/2018
2018	4221	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	2/13/2018
2018	3139	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD	HEBER	2/12/2018
2018	3558	COMBUSTION	HEBER PUBLIC UTILITY DISTRICT	1184 ROCKWOOD AVE.	HEBER	2/12/2018
2018	4206	COMBUSTION	CITY OF EL CENTRO	1910 WATERMAN AVE.	EL CENTRO	2/9/2018
2018	3170	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	ZINETTA ROAD @ ALAMO RIVER	CALEXICO	2/9/2018
2018	3253	COMBUSTION	I. C. GATEWAYS CSA C/O PUBLIC WORKS	1597 E. HWY 98	CALEXICO	2/9/2018
2018	3468	COMBUSTION	VALLEY ENDOSCOPY CENTER	1550 N. IMPERIAL AVE. SPACE 3	EL CENTRO	2/9/2018
2018	3428	COMBUSTION	LOWE'S INC.	2053 N. IMPERIAL AVENUE	EL CENTRO	2/6/2018
2018	4016	COMBUSTION	VALLEY CONVALESCENT CENTER	1700 SOUTH IMPERIAL AVE.	EL CENTRO	2/6/2018
2018	3171	COMBUSTION	3E COMPANY/HOME DEPOT #1059	320 WAKE AVENUE	EL CENTRO	2/5/2018
2018	3432	COMBUSTION	TARGET #1816	2295 N. IMPERIAL AVE.	EL CENTRO	2/5/2018
2018	2055	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	1/23/2018
2018	2486	COMBUSTION	CITY OF CALEXICO	298 E. ANZA RD	CALEXICO	1/23/2018
2018	3090	COMBUSTION	CITY OF CALEXICO	298 E ANZA RD	CALEXICO	1/23/2018
2018	3943	COMBUSTION	DEPARTMENT OF HOMELAND SECURITY	1115 N. IMPERIAL AVENUE	EL CENTRO	1/23/2018
2018	4158	COMBUSTION	CUSTOMS ENFORCEMENT	1115 N. IMPERIAL	EL CENTRO	1/23/2018
2018	3400	COMBUSTION	FLAT WEST WIRELESS, LLC/DBA CLEARTALK	1901 W. ADAMS AVENUE	EL CENTRO	12/30/2018
2018	4337	COMPOST	SPREADCO, INC.	910 NICHOLS ROAD	EL CENTRO	6/11/2018
2018	4462	COMPOST	TRUSOURCE, LLC	96 E. FAWCETT ROAD	HEBER	6/7/2018
2018	564	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E MAIN ST	EL CENTRO	ATC
2018	2373	CONCRETE	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN	EL CENTRO	ATC
2018	3112	CONCRETE	GIBSON & SCHAEFER, INC	1143 ROCKWOOD RD	HEBER	8/6/2018
2018	2230	CONCRETE	CEMEX CONSTRUCTION MATERIALS PACIFIC, LLC	550 E. MAIN STREET	EL CENTRO	3/21/2018
2018	1065	CONCRETE	HALLIBURTON ENERGY SERVICES	801 SO. 2ND ST.	EL CENTRO	3/14/2018
2018	2663	CUTTING	US GYPSUM COMPANY	381 W. HWY 80	EL CENTRO	2/15/2018
2018	3321	DRY CLEANER	VALLEY DRY CLEANING	1480 S. 4TH STREET	EL CENTRO	1/8/2018
2018	2292	DRY CLEANER	MODERN CLEANERS	168 E. COLE ROAD STE. 12	CALEXICO	1/2/2018
2018	1500	GEOTHERMAL	HEBER FIELD COMPANY	895 PITZER ROAD	HEBER	3/27/2018
2018	1649	GEOTHERMAL	HEBER FIELD COMPANY	947 DOGWOOD RD.	HEBER	3/27/2018
2018	1801	GEOTHERMAL	HEBER FIELD COMPANY	GTW 4	HEBER	3/27/2018

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
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	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	1802	GEOTHERMAL	HEBER FIELD COMPANY	GTW 6	HEBER	3/27/2018
2018	2231	GEOTHERMAL	HEBER FIELD COMPANY	DOGWOOD RD	HEBER	3/27/2018
2018	2257	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	3/27/2018
2018	2258	GEOTHERMAL	HEBER FIELD COMPANY	T16S, R14E, SEC 27	HEBER	3/27/2018
2018	1641	GEOTHERMAL	HEBER GEOTHERMAL COMPANY (HGC)	895 PITZER ROAD	HEBER	3/27/2018
2018	2217	GEOTHERMAL	SECOND IMPERIAL GEOTHERMAL COMPANY SIGC	855 DOGWOOD ROAD	HEBER	3/27/2018
2018	2696	HAY COMPRESSING	EL TORO EXPORT	1469 LA BRUCHERIE RD	EL CENTRO	11/7/2018
2018	2369	HAY COMPRESSING	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	7/27/2018
2018	2405	HAY COMPRESSING	KUHN HAY	1880 JEFFREY RD	EL CENTRO	4/23/2018
2018	3164	HAY COMPRESSING	K & M PRESS, INC.	1490 W. EVAN HEWES	EL CENTRO	2/22/2018
2018	2196	INCINERATOR	HEMS BROTHERS MORTUARY	1975 S. 4TH ST	EL CENTRO	12/11/2018
2018	1632	INCINERATOR	CBP	200 E. FIRST STREET	CALEXICO	8/29/2018
2018	3921	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD STREET	EL CENTRO	8/22/2019
2018	2569	MANUFACTURING	BULL HOLDING, CORP	1701 BOWKER RD.	EL CENTRO	10/9/2018
2018	1696	MANUFACTURING	WESTWAY FEED PRODUCTS CO., LLC	515 N. 3RD ST,	EL CENTRO	8/22/2018
2018	4138	MANUFACTURING	AMETZA, LLC	1520 FORRESTER ROAD	EL CENTRO	4/5/2018
2018	2735	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/15/2018
2018	3511	MANUFACTURING	US GYPSUM COMPANY	3810 W. HWY. 80	EL CENTRO	2/15/2018
2018	3542	MANUFACTURING	US GYPSUM COMPANY	3810N W. HWY 80	EL CENTRO	2/15/2018
2018	2173	MANUFACTURING	MULHERIN MONUMENTAL COMPANY	1000 S. 2ND ST	EL CENTRO	2/14/2018
2018	1648	MANUFACTURING	WILBUR ELLIS COMPANY	45 W. DANENBERG ROAD	EL CENTRO	1/19/2018
2018	4551	MILLING	LONDON SEEDS	1872 N. DREW ROAD	EL CENTRO	7/24/2018
2018	2700	MILLING	SEEDS WEST INC	202 E. ROSS AVE	EL CENTRO	7/13/2018
2018	2558	MILLING	ALLSTAR SEED COMPANY	2015 SILSBEE RD.	EL CENTRO	6/27/2018
2018	4294	MILLING	EL TORO LAND & CATTLE CO.	96 FAWCETT	HEBER	6/18/2018
2018	3109	MILLING	US GYPSUM COMPANY	3810 W. EVAN HEWES	EL CENTRO	2/15/2018
2018	4481	NON RETAIL SS	CALIFORNIA DEPARTMENT OF TRANSPORTATION	1102 MONTENEGRO WAY	EL CENTRO	12/4/2018
2018	4205	NON RETAIL SS	CITY OF EL CENTRO	1910 N. WATERMAN AVE.	EL CENTRO	3/9/2018
2018	4432	NON RETAIL SS	CALIFORNIA DEPARTMENT OF PARKS AND RECREATION	HEBER DUNES SVRA W. HEBER & CA-7	HEBER	12/18/2018
2018	2212	NON-RETAIL SS	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	11/1/2018
2018	4310	NON-RETAIL SS	U.S. CBP, OFFICE OF BORDER PATROL, CALEXICO STATION	536 BARBARA WORTH RD.	CALEXICO	9/28/2018
2018	2626	NON-RETAIL SS	CITY OF CALEXICO	640 PIERCE	CALEXICO	8/8/2018
2018	3971	NON-RETAIL SS	LA BRUCHERIE PRODUCE, LLC	1407 S. LABRUCHERIE ROAD	EL CENTRO	7/23/2018
2018	4266	NON-RETAIL SS	CALEXICO UNIFIED SCHOOL DISTRICT	1085 ANDRADE AVENUE	CALEXICO	7/6/2018
2018	3607	NON-RETAIL SS	EIGHT STAR COMMODITIES	2015 SILSBEE RD.	EL CENTRO	1/8/2018
2018	4457	NON-RETAILL SS	IMPERIAL TARP & COVERS, INC.	104 E. MCCABE RD	EL CENTRO	7/3/2018
2018	2311	PAINT BOOTH	CALIBER COLLISION CENTER	503 E. MAIN STREET	EL CENTRO	12/4/2018
2018	4459	PAINT BOOTH	CRIS BODY SHOP	571 SCARONI RD	CALEXICO	10/4/2018

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	1667	PAINT BOOTH	NAVAL AIR FACILITY	BLDG #508	EL CENTRO	8/20/2018
2018	4161	PAINT BOOTH	MIKES PAINT AND BODY	1309 ESTRADA BLVD	CALEXICO	8/7/2018
2018	3220	PAINT BOOTH	ESCOBEDO PAINT & BODY SHOP	361 E MAIN STREET	EL CENTRO	8/1/2018
2018	2303	PAINT BOOTH	MODERN PAINT & BODY SHOP	830 STATE ST	EL CENTRO	6/27/2018
2018	3775	PAINT BOOTH	STANS AUTO BODY	1880 W. EUCLID AVE	EL CENTRO	6/7/2018
2018	4243	PAINT BOOTH	CESARS BODY SHOP	202 S. 3RD STREET	EL CENTRO	6/5/2018
2018	4553	PAINT BOOTH	C R & R INC.	853 DOGWOOD ROAD	EL CENTRO	5/7/2018
2018	3375	PAINT BOOTH	DOGWOOD AUTO BODY INC.	456 E. STATE STREET	EL CENTRO	5/1/2018
2018	3800	PAINT BOOTH	HI-TECK AUTO BODY	799 E. MAIN STREET	EL CENTRO	4/17/2018
2018	2541	PAINT BOOTH	NICE & EASY	400 EMERSON	CALEXICO	2/26/2018
2018	4471	PAINT BOOTH	PRO 1 COLLISION CENTER	345 W. STATE STREET	EL CENTRO	2/15/2018
2018	3151	PAINT BOOTH	GUADALUPE MORENO	602 E. MAIN ST	EL CENTRO	2/14/2018
2018	4246	PAINT BOOTH	MANDYS AUTO BODY	565 SCARONI RD	CALEXICO	2/12/2018
2018	3477	PAINT BOOTH	LUDWIG'S AUTO BODY	751 EAST MAIN ST	EL CENTRO	2/8/2018
2018	2278	PAINT BOOTH	EL CENTRO BODY SHOP	240 SOUTH 3RD ST	EL CENTRO	2/7/2018
2018	4108	PAINT BOOTH	TORRES BODY SHOP	700 PIERCE AVE.	CALEXICO	1/23/2018
2018	4103	PAINT BOOTH	MOLES GARAGE	699 BROADWAY STREET	EL CENTRO	2/26/2018
2018	4372	PAINTBOOTH	HALF BAKED POWDERCOATING	1099 INDUSTRY WAY, STE. F	EL CENTRO	ATC
2018	4536	PAINTBOOTH	OSCAR O HERNANDEZ	705 HAROLD SUITE C	CALEXICO	9/7/2018
2018	4449	PAINTBOOTH	TOMS AUTO BODY	1761 W. ADAMS AVE.	EL CENTRO	3/26/2018
2018	2187	PAINTING	IMPERIAL IRRIGATION DISTRICT	544 BOWKER RD	CALEXICO	8/9/2018
2018	3584	PETRO. STORAGE	BEN ABATTI FARMS	204 E. MCCABE RD.	EL CENTRO	11/30/2018
2018	3323	PETRO. STORAGE	SMD LOGISTICS, INC.	101 E. MAIN ST	HEBER	8/20/2018
2018	3570	PETRO. STORAGE	CITY OF CALEXICO	801 W. 2ND STREET	CALEXICO	7/9/2018
2018	539	PETRO. STORAGE	CALTRANS	1605 W. ADAMS	EL CENTRO	5/19/2018
2018	634	PETRO. STORAGE	I. C. PUBLIC WORKS	HEBER ROAD YARD	HEBER	5/14/2018
2018	1156	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA UNIT 4	EL CENTRO	3/16/2018
2018	2152	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 VILLA RD	EL CENTRO	3/16/2018
2018	3964	POWER GENERATION	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA ROAD	EL CENTRO	3/16/2018
2018	2359	SANDBLASTING	NAVAL AIR FACILITY	BLDG 508/PWC NAF	EL CENTRO	8/20/2018
2018	2693	SANDBLASTING	EW CORPORATION	1002 EAST MAIN STREET	EL CENTRO	8/18/2018
2018	4447	SANDBLASTING	DAMMARELL INDUSTRIES	104 E. MCCABE RD.	EL CENTRO	6/18/2018
2018	4248	SANDBLASTING	COMPLETE METAL FABRICATION, INC.	596 E MAIN STREET	EL CENTRO	6/12/2018
2018	4406	SANDBLASTING	HAZARD CONSTRUCTION CO.	395 E. AURORA AVE	EL CENTRO	6/12/2018
2018	2551	SANDBLASTING	WYMORE, INC.	697 S. DOGWOOD RD	EL CENTRO	6/12/2018
2018	2958	SANDBLASTING	SUPERIOR READY MIX DBA RYERSON	802 E. MAIN STREET	EL CENTRO	6/11/2018
2018	4379	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	HWY 98 & E. HIGHLINE	CALEXICO	5/15/2018
2018	2416	SANDBLASTING	IMPERIAL IRRIGATION DISTRICT	485 E. VILLA RD	EL CENTRO	3/16/2018

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	4528	SERVICE STATION	ARCO	888 W SECOND STREET	CALEXICO	ATC
2018	4559	SERVICE STATION	CIRCLE K STORES, INC. #2706057	1999 WEST ADAMS AVENUE	EL CENTRO	ATC
2018	400	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1302 S. IMPERIAL AVE.	EL CENTRO	5/16/2018
2018	2129	SERVICE STATION	7-ELEVEN #39518A	2420 S. 4TH ST	EL CENTRO	12/13/2018
2018	3626	SERVICE STATION	J.A.G. CAPITAL INVESTMENTS, INC DBA FILLCO	1302 S. 4TH STREET	EL CENTRO	12/11/2018
2018	433	SERVICE STATION	THE SOCO GROUP INC.	1690 SO. 4TH ST.,	EL CENTRO	12/4/2018
2018	3686	SERVICE STATION	ZANID HOLDINGS LP, dba ARCO AMPM	3603 S. DOGWOOD	EL CENTRO	11/19/2018
2018	2316	SERVICE STATION	APRO, LLC dba MY GOODS MARKET # 1444	525 N. LABRUCHERIE	EL CENTRO	11/8/2018
2018	1399	SERVICE STATION	7-ELEVEN, INC.	1485 OCOTILLO	EL CENTRO	11/5/2018
2018	1549	SERVICE STATION	7-ELEVEN, INC.	904 IMPERIAL AVE	CALEXICO	11/5/2018
2018	463	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1036 IMPERIAL AVE.	CALEXICO	10/19/2018
2018	4124	SERVICE STATION	NORTH COUNTY INVESTMENTS DBA SKY FUEL	724 EMERSON	CALEXICO	10/16/2018
2018	413	SERVICE STATION	THE SOCO GROUP INC.	940 IMPERIAL AVE	CALEXICO	10/16/2018
2018	488	SERVICE STATION	AMERI MEX SERVICES, INC. DBA DSM FUEL STOPS	2115 S 4TH ST.	EL CENTRO	10/11/2018
2018	2505	SERVICE STATION	McNEECE BROS OIL CO INC	478 E. MAIN	EL CENTRO	10/9/2018
2018	3278	SERVICE STATION	GASTRAK OF CALEXICO, LLC	435 S MENVILLE RD.	CALEXICO	10/3/2018
2018	1665	SERVICE STATION	KENNEDY MARKET	70 E. MAIN ST.	HEBER	8/14/2018
2018	1686	SERVICE STATION	NAVAL AIR FACILITY	BLDG. 200 JETMART A ST.	EL CENTRO	8/14/2018
2018	2368	SERVICE STATION	THE SOCO GROUP INC.	250 IMPERIAL AVE.,	CALEXICO	7/12/2018
2018	4095	SERVICE STATION	PACIFICLAND INTERNATIONAL DEVELOPMENT, INC.	1105 YOURMAN ROAD	HEBER	7/11/2018
2018	2159	SERVICE STATION	SUPER STOP TRAVEL CENTER	550 WAKE AVE.	EL CENTRO	6/4/2018
2018	1886	SERVICE STATION	TESORO REFINING AND MARKETING CO.	824 IMPERIAL AVE.	CALEXICO	5/24/2018
2018	3246	SERVICE STATION	TESORO REFINING AND MARKETING CO.	1791 MAGGIO ROAD	CALEXICO	5/23/2018
2018	1988	SERVICE STATION	TESORO REFINING & MARKETING CO., LLC	444 S. IMPERIAL	CALEXICO	5/22/2018
2018	1398	SERVICE STATION	7-ELEVEN, INC.	2050 S. 4TH	EL CENTRO	5/1/2018
2018	2071	SERVICE STATION	THE GORE GROUP ENTERPRISE, INC.	1499 WEST MAIN ST.	EL CENTRO	4/17/2018
2018	3270	SERVICE STATION	MY MIHAN INC/DBA MUZZ PETROLEUM	1098 COLE ROAD	CALEXICO	4/16/2018
2018	3347	SERVICE STATION	CALEXICO OIL CORPORATION	832 BIRCH ST	CALEXICO	4/5/2018
2018	2081	SERVICE STATION	ARCO AM PM/NAS, LLC	1025 KLOKE RD	CALEXICO	4/4/2018
2018	2349	SERVICE STATION	HANAA DEVELOPMENT , LLC	105 W. COLE BLVD.	CALEXICO	4/2/2018
2018	2769	SERVICE STATION	COSTCO #121	2030 N. IMPERIAL	EL CENTRO	4/1/2018
2018	4125	SERVICE STATION	7-ELEVEN INC.	1101 ANDRADE AVE.	CALEXICO	3/13/2018
2018	3255	SERVICE STATION	ReEM CORPORATION dba FILLCO	324 IMPERIAL AVE	CALEXICO	3/6/2018
2018	476	SERVICE STATION	BHAGVATI CORPORATION	1850 SO.IMPERIAL	EL CENTRO	3/1/2018
2018	2167	SERVICE STATION	ZANID HOLDINGS LP dba ARCO AMPM	398 AURORA DR	EL CENTRO	2/27/2018
2018	1161	SERVICE STATION	TESORO WEST COAST COMPANY, LLC	960 N. IMPERIAL AVE.	EL CENTRO	2/12/2018
2018	1748	SERVICE STATION	7-ELEVEN, INC.	485 E. MAIN STREET	EL CENTRO	2/8/2018
2018	735	SERVICE STATION	7-ELEVEN, INC.	815 ADAMS	EL CENTRO	1/17/2018

Table F.1-2a. ICAPCD Inspections of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	PTO #	Permit Description	Company Name	Location	City	Date Inspected
2018	2390	SERVICE STATION	7-ELEVEN, INC.	168 E. COLE RD	CALEXICO	1/16/2018
2018	3256	SERVICE STATION	RFH CORPORATION	1011 IMPERIAL AVE.	CALEXICO	1/16/2018
2018	399	SERVICE STATION	ANTUNEZ SHELL	500 IMPERIAL	CALEXICO	1/9/2018
2018	3742	SERVICE STATION	HRS VENTURES/RODILES	1498 COLE BLVD	CALEXICO	12/14/2018
2018	2521	SS CARDLOCK	THE SOCO GROUP INC.	350 MAIN ST	EL CENTRO	11/24/2018
2018	3619	SS CARDLOCK	THE SOCO GROUP INC.	350 MAIN STREET	EL CENTRO	9/12/2018
2018	2545	SS CARDLOCK	McNEECE BROS OIL CO INC	591 E HEIL	EL CENTRO	1/17/2018
2018	2662	STORAGE	US GYPSUM COMPANY	3810 EVEN HEWES HWY	EL CENTRO	2/15/2018
2018	2821	STORAGE	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	2/15/2018
2018	2828	STORAGE	US GYPSUM COMPANY	3810 W. HWY 80	EL CENTRO	2/15/2018
2018	4083	STORAGE	US GYPSUM COMPANY	3810 W EVAN HEWES HWY	EL CENTRO	2/15/2018
2018	3076	WASTE DISPOSAL	I. C. PUBLIC WORKS	WORTHINGTON RD W OF IMPERIAL	EL CENTRO	9/18/2018
2018	2836	WASTE DISPOSAL	US GYPSUM COMPANY	3810 W. EVAN HEWES HWY	EL CENTRO	2/15/2018
2018	3074	WASTE DISPOSAL	I. C. PUBLIC WORKS	HWY 98, & NEW RIVER,	CALEXICO	2/14/2018

Notes:

1. Inspections were identified by filtering the ICAPCD inspection list by location. This table presents all inspections within El Centro, Heber, and Calexico from 2016 to 2018, including permits and facilities which have been inactivated or closed.

Abbreviations:

ATC - Authority to Construct

PTO - Permit to Operate

SS - Stationary Source

Table F.1-2b. ICAPCD Inspection Rate of Facilities within the El Centro-Heber-Calexico Corridor, 2016-2018

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	Total Permits	Total Inspections	Percent Inspected
2016	254	254	100
2017	260	260	100
2018	260	260	100

Notes:

1. ICAPCD inspection rate is calculated by comparing the total number of inspections to the total number of permits in Table F-2a. This list is specific to permitted facilities located within El Centro, Heber, and Calexico. The number of permits above may not match the number of permits in Tables F-1a and F-1b due to the ongoing issuance of new permits and/or inactivation of closed permits over the three year period.

Table F.1-3a. ICAPCD Complaints within the El Centro-Heber-Calexico Corridor, 2016-2018

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

YEAR	Date	Complaint #	Complaint Type	Location/Description of Complaint	NOV #	NTC #	Warning (X)	Nothing Found (X)
2016	1/4/16	6938	OPEN FIRE	SOMEONE BURNING AT [ADDRESS] EL CENTRO			X	
2016	1/7/16	6940	AG RELATED	MOVING EQUIPMENT & CREATING TRACK-OUT ON [ADDRESS]		1		
2016	1/14/16	6942	SMOKE	NEIGHBOR BURNING AT NIGHT / [ADDRESS] IN HEBER				X
2016	1/14/16	6943	OPEN FIRE	ILLEGAL BURN AT [ADDRESS] EL CENTRO			X	
2016	1/15/16	6944	DUST	NEIGHBOR CREATING DUST / [ADDRESS]				X
2016	1/16/16	6945	SMOKE	[ADDRESS] IN HEBER			X	
2016	1/16/16	6946	SMOKE	[ADDRESS] IN HEBER			X	
2016	1/17/16	6947	OPEN FIRE	[ADDRESS] IN HEBER				X
2016	1/20/16	6948	DUST	1-800-ASPHALT TRUCKS CREATING DUST AT [ADDRESS] EL CENTRO			X	
2016	1/26/16	6950	DUST	A LOT OF DUST AT [ADDRESS] IN EL CENTRO				X
2016	1/26/16	6951	SMOKE	NEIGHBOR BURNING / SMOKE IMPACTING HOUSES ON [ADDRESS] IN EC			X	
2016	2/16/16	6965	OPEN FIRE	ASHES FALLING INTO SCHOOL PLAYGROUND [ADDRESS] EC	6101			
2016	2/26/16	6967	SMOKE	BURNING DAYS/EVENINGS / [ADDRESS] EL CENTRO / VERY SMOKEY			X	
2016	2/26/16	6968	OPEN BURN	PLASTIC BEING BURNED AT [ADDRESS] EL CENTRO				X
2016	3/2/16	6971	OPEN BURN	NEIGHBOR BURNING BEFORE BURN HOURS/SMOKE CREATING A NUISANCE			X	
2016	3/17/16	6981	DUST	BLOWER BEING USED AT [ADDRESS] EC / VERY DUSTY				X
2016	3/28/16	6985	DUST	AGRICULTURAL OPERATION / VERY DUSTY / [ADDRESS] IN EC				X
2016	4/8/16	6990	DUST	DUST BEING CREATED AT [ADDRESS] IN CALEXICO BY [FACILITY]				X
2016	4/26/16	6992	OTHER	CONSTRUCTION & DEMOLITION GASOLINE STATION ACROSS [ADDRESS] CLX				
2016	5/4/16	6996	DUST	[FACILITY] IN CALEXICO VERY DUSTY				X
2016	5/11/16	6998	DUST	[ADDRESS] / HARVESTING CREATING A LOT OF DUST				X
2016	5/31/16	7004	DUST/ODORS	FUEL ODOR AND LOTS OF DUST IN THE AIR [ADDRESS] EC				X
2016	6/3/16	7005	OPEN FIRE	[FACILITY] IS LIGHTING FIRES IN THE MIDDLE OF THE NIGHT	6169			
2016	6/27/16	7011	DUST	DUST BEING CREATED AT [ADDRESS] IN EL CENTRO			X	
2016	7/6/16	7012	DUST	DUST BEING CREATED AT [ADDRESS] EL CENTRO			X	
2016	7/26/16	7017	DUST	DUST BEING CREATED AT [ADDRESS] IN EL CENTRO			X	
2016	9/17/16	7023	DUST	DUST BEING GENERATED AT [ADDRESS] DUE TO CONSTRUCTION				X
2016	9/27/16	7025	OTHER	BODY SHOP OPERATING [ADDRESS] EL CENTRO				X
2016	9/28/16	7026	SMOKE	RUBBER/PLASTIC/HOUSEHOLD TRASH [ADDRESS] EL CENTRO, CA			X	
2016	10/10/16	7028	OTHER	NEIGHBOR PAINTING STRONG FUMES AT [ADDRESS], HEBER CA				X
2016	10/21/16	7032	DUST	[ADDRESS] IN EL CENTRO, CA - ALLEY NORTH OF [SCHOOL]				X
2016	10/21/16	7033	SMOKE	NEIGHBOR APPEARS TO BE BURNING TRASH - [ADDRESS] IN EL CENTRO, CA			X	
2016	11/2/16	7035	DUST / AG RELATED	TRACTOR WORK ON FIELD ON WINDY DAYS CAUSING A LOT OF DUST - [ADDRESS] IN EL CENTRO			X	
2016	11/2/16	7036	DUST	TRUCKS CAUSING DUST TO KICK UP ON DIRT ROAD - [ADDRESS] EL CENTRO				X
2016	11/14/16	7040	DUST	TRACTORS AND PICKUPS CREATING A LOT OF DUST- [ADDRESS] EC.				X
2016	12/9/16	7050	GAS STATION	WHILE PUMPING GAS ON THE [FACILITY] ON [ADDRESS] IN EL CENTRO, THE NOZZLES WOULD NOT STOP WHEN THE FUEL TANK WAS FULL.				X
2017	1/25/17	7062	DUST	NEIGHBOR IS SANDBLASTING IN THEIR GARAGE AND THEN BLOWING IT ALL OUT INTO THE STREET - [ADDRESS], CALEXICO				X
2017	2/8/17	7064	SMOKE/OPEN FIRE	NEIGHBOR TO THE WEST IS BURNING AT 4:46 PM AND CAUSING A LOT OF SMOKE - [ADDRESS] EL CENTRO,CA			X	
2017	2/15/17	7066	OPEN FIRE	ILLEGAL BURNING HAPPENING NEAR A SCHOOL - [ADDRESS] - CALEXICO, CA				
2017	3/8/17	7069	SMOKE/OPEN FIRE	NEIGHBOR BURNING EVERYDAY AT ALL HOURS - [ADDRESS] EL CENTRO, CA				
2017	3/17/17	7073	OPEN FIRE	FIELD BURNING - [ADDRESS], EL CENTRO, CA				X

Table F.1-3a. ICAPCD Complaints within the El Centro-Heber-Calexico Corridor, 2016-2018

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

YEAR	Date	Complaint #	Complaint Type	Location/Description of Complaint	NOV #	NTC #	Warning (X)	Nothing Found (X)
2017	5/2/17	7080	DUST	TRUCKS ARE CAUSING A LOT OF DUST ON THE DIRT ROADS NEAR CALLERS HOME - [ADDRESS], EL CENTRO				X
2017	7/17/17	7091	DUST	[FACILITY] CAUSING A LOT OF DUST-[ADDRESS] EC		2562		
2017	8/16/17	7094	DUST	CONSTRUCTION ON [ADDRESS] IS CREATING A LOT OF DUST - EC		2567		
2017	8/25/17	7099	SMOKE	THICK CLOUD OF SMOKE ON THE WESTSIDE OF CALEXICO.				
2017	9/26/17	7107	DUST	DIRT ROAD ACROSS THE STREET IS CREATING A LOT OF DUST - [ADDRESS] EL CENTRO				X
2017	9/27/17	7108	DUST	THERE IS A MACHINE STIRRING UP A LOT OF DUST IN THE [FACILITY] PARKING LOT - CALEXICO			X	
2017	10/15/17	7119	SMOKE	NEIGHBOR IS BURNING ALL NIGHT AT [ADDRESS] IN HEBER				X
2017	10/17/17	7120	DUST	A LOT OF CARS DRIVING IN THE DIRT NEXT TO [SCHOOL] - HEBER			X	
2017	10/18/17	7121	OPEN FIRE	OLD FEEDLOT ON FIRE - [ADDRESS] CALEXICO				X
2017	11/15/17	7131	SMOKE	FARMING OPERATION ON CORNER OF [ADDRESS] IN E.C. IS CREATING A LOT OF SMOKE				X
2017	11/17/17	7134	SMOKE	BURNING TAKING PLACE ON [ADDRESS] IN EL CENTRO			X	
2017	11/28/17	7139	DUST	DUST BEING CAUSE BY TRAFFIC USING DIRT ST BETWEEN [ADDRESS] IN CALEXICO				
2017	12/10/17	7149	DUST	DUST COMING FROM DRIVING ON UNPAVED ROAD NEAR [ADDRESS] IN EC.				
2017	12/11/17	7148	DUST	DUST FROM HARVESTING OPERATION ON CORNER OF [ADDRESS] IN EC.				X
2017	12/28/17	7155	DUST	DUST BEING CREATED AT [ADDRESS], EL CENTRO			X	
2018	1/26/18	7167	SMOKE	CALLER COMPLAINED ABOUT AG BURNING IN IMPERIAL TO CALEXICO. STATED HE WAS PICKING UP DAUGHTER AT [ADDRESS] AND SMOKE WAS BAD NEAR [ADDRESS]				X
2018	1/31/18	7173	ODORS	STRONG MANURE SMELL NEAR AREA WHERE BURN OCCURRED A FEW WEEKS AGO IN CLX.	6376			
2018	2/2/18	7176	SMOKE/ODORS	CALLER IS COMPLAINING ABOUT THE SMOKE AND HAZE INSIDE OF EL CENTRO				
2018	2/6/18	7179	SMOKE	SMOKE INSIDE OF EL CENTRO VERY BAD BY [SCHOOL]				
2018	3/15/18	7192	SMOKE	Welding Smoke right in front of [ADDRESS] El Centro CA			X	
2018	4/11/18	7197	SMOKE	[COMPLAINANT] is complaining about smoke/thick fog that has a noxious smell and is making him sick. This occurs mainly at night time at his Apartment complex in [ADDRESS] El Centro.				X
2018	4/18/18	7200	DUST	Dust created from empty lot in El Centro [ADDRESS].				X
2018	5/1/18	7201	DUST	[FACILITY] construction creating dust next to [ADDRESS] in Calexico, CA.				X
2018	5/30/18	7209	SMOKE	Field burning South of El Centro going down [ADDRESS] you will see it. As per [COMPLAINANT] field burn is fogging up all of El Centro.				X
2018	7/10/18	7215	GAS STATION	LADY CALLED TO COMPLAIN ABOUT [FACILITY] AT [ADDRESS] IN EL CENTRO. PUMP #4 NOZZLE NOT WORKING CORRECTLY. NOZZLE BOUNCED OFF CAR AND MADE A BIG GASOLINE SPILL.		2624		
2018	7/13/18	7216	OPEN FIRE	LADY REPORTED OPEN FIRE SMOKE IMPACTING [ADDRESS]. FIRE WAS BETWEEN [ADDRESS] NEAR [SCHOOL] IN HEBER.	6433			
2018	7/19/18	7218	OTHER	COMPLAINER CALLED ME AND COMPLAINED ABOUT [XXXX] EQUIPMENT CRUSHING AT [FACILITY] IN HEBER				X
2018	8/22/18	7223	DUST	[COMPLAINANT] IS COMPLAINING ABOUT DUST BEING CREATED BY HIS PROPERTY ON [ADDRESS] EL CENTRO. HE BELIEVES IT IS COMING FROM THE RV PARK NEXT TO [FACILITY]. HE STATES HE WASHES HIS CAR AND BY THE NEXT DAY IT IS COVERED IN DUST.				X
2018	10/9/18	7240	DUST	GENTLEMAN IS COMPLAINING ABOUT DUST BEING CREATED AT A CONSTRUCTION SITE ON [ADDRESS] IN CALEXICO.				X
2018	10/18/18	7244	DUST	[COMPLAINANT] IN CALEXICO IS COMPLAINING ABOUT DUST BEING CREATED BY AGRICULTURE WORK IN FIELDS NEARBY SCHOOL. HE STATES THE DUST IS IMPACTING SCHOOL.			X	
2018	10/20/18	7245	SMOKE	LADY COMPLAINED ABOUT AG BURN THAT WAS SCHEDULED IN CALEXICO, SHE STATED THE AG FIELD BURNING AND SMOKE IMPACTED CALEXICO.				X

Table F.1-3a. ICAPCD Complaints within the El Centro-Heber-Calexico Corridor, 2016-2018

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

YEAR	Date	Complaint #	Complaint Type	Location/Description of Complaint	NOV #	NTC #	Warning (X)	Nothing Found (X)
2018	11/1/18	7248	OTHER-PAINTBOOTH	ENVIRONMENTAL HEALTH FORWARDED TO US A POSSIBLE ILLEGAL PAINTING COMPLAINT AT [FACILITY] IN EL CENTRO.	6446			
2018	11/9/18	7250	DUST	[COMPLAINANT] CALLED TO COMPLAIN A LOT OF DUST IS BEING CREATED MOSTLY AFTE 5:00 PM HE MENTIONED TRAILERS ARE BEING MOVED. NO WATER TRUCKS ON SITE [ADDRESS] CALEXICO			X	
2018	11/21/18	7253	OTHER - AIR QUALITY	LADY CALLED TO COMPLAIN ABOUT THE AIR QUALITY IN EL CENTRO TODAY. SHE WANTS TO KNOW WHY IT IS SO BAD TODAY. SHE ASKED TO GET A CALL BACK.				
2018	11/28/18	7257	DUST	GENTLEMAN IS COMPLAINING ABOUT [FACILITY] WORK SITE BY [ADDRESS] HE STATES THAT HE SAW A HUGE CLOUD OF DENSE DUST.				X
2018	12/17/18	7261	DUST/TRACKOUT	[COMPLAINANT] FROM [FACILITY] CALLED TO SUBMIT A COMPLAINT REGARDING DUST AND TRACKOUT ALONG [ADDRESS] NEARBY THE [FACILITY].	5541	2635		
2018	12/21/18	7262	OPEN FIRE/SMOKE	GENTLEMAN CALLED TO COMPLAIN ABOUT RESIDENT IN HEBER BURNING TIRES.				X

Notes:

1. ICAPCD complaints received between 2016 and 2018 were filtered based on location. This list represents all complaints received with sources located within El Centro, Heber, and Calexico.

Table F.1-3b. El Centro-Heber-Calexico Corridor Complaint Types
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Complaint Type	Number of Complaints				Percentage
	2016	2017	2018	Total	
AG RELATED	1			1	1%
DUST	15	11	7	33	42%
DUST / AG RELATED	1			1	1%
DUST/ODORS	1			1	1%
DUST/TRACKOUT			1	1	1%
GAS STATION	1		1	2	3%
ODORS			1	1	1%
OPEN BURN	2			2	3%
OPEN FIRE	5	3	1	9	12%
OPEN FIRE/SMOKE			1	1	1%
OTHER	3			3	4%
OTHER			1	1	1%
OTHER - AIR QUALITY			1	1	1%
OTHER-PAINTBOOTH			1	1	1%
SMOKE	7	4	6	17	22%
SMOKE/ODORS			1	1	1%
SMOKE/OPEN FIRE		2		2	3%
Grand Total	**36**	**20**	**22**	**78**	**100%**

Notes:
1. Complaints listed in Table F-3a are classified by complaint type by ICAPCD. The table above totals the number of complaints in Table F-3a in each classification for sources located within El Centro, Heber, and Calexico from 2016 to 2018.

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2016	5838		EL CENTRO	Condition B.3.a	Nitrogen oxide emission concentration - not exceed 2.0	9/25/2016	Stationary Source
2016	6089		CALEXICO	400.3.G.2	SOURCE TESTING	4/20/2016	Stationary Source
2016	6094		CALEXICO	CONDITION NO.19	NO ANNUAL REPORT	7/7/2016	Annual Report
2016	6132		EL CENTRO	CONDITION NO.15	EXCEED DAILY LIMITS	5/23/2016	Stationary Source
2016	6137		EL CENTRO	CONDITION 10	EMERGENCY VENTS LEAKING GAS	1/29/2016	Stationary Source
2016	6161		EL CENTRO	112.D.5	FAILURE TO COMPLY TO A NOTICE TO COMPLY	5/20/2016	Stationary Source
2016	6166		CALEXICO	112.D.5	FAILURE TO COMPLY TO A NOTICE TO COMPLY	5/25/2016	Stationary Source
2016	6180		EL CENTRO	CONDITION NO.13	DAILY LIMITS EXCEEDED	4/26/2016	Stationary Source
2016	6182		HEBER	CONDITION NO.19	NO ANNUAL REPORT	5/26/2016	Annual Report
2016	6189		EL CENTRO	CONDITION NO.9	NO ANNUAL REPORT	5/31/2016	Annual Report
2016	6198		CALEXICO	CONDITION NO.19	NO ANNUAL REPORT	5/25/2016	Annual Report
2016	6203		CALEXICO	CONDITION NO.14	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6204		CALEXICO	CONDITION NO.11	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6205		EL CENTRO	CONDITION NO.14	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6212		EL CENTRO	CONDITION NO.16	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6213		CALEXICO	CONDITION NO.9	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6214		CALEXICO	CONDITION NO.9	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6221		EL CENTRO	CONDITION NO.14	NO ANNUAL REPORT	5/25/2016	Annual Report
2016	6225		CALEXICO	CONDITION NO.20	NO ANNUAL REPORT	5/16/2016	Annual Report
2016	6236		EL CENTRO	RULE 401, SECTION B	NO PERSON SHALL RELEASE OR DISCHARGE INTO THE ATMOSPHERE ANY AIR CONTAMINANT OTHER THAN UNCOMBINED WATER VAPOR	12/15/2016	Stationary Source
2016	6243		EL CENTRO	CONDITION NO.9	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6245		EL CENTRO	CONDITION NO.15	NO ANNUAL REPORT	6/1/2016	Annual Report
2016	6250		EL CENTRO	201.B	PERMIT TO OPERATE	6/17/2016	Permit
2016	6255		CALEXICO	CONDITION NO.8	MAINTENANCE/TESTING HOURS EXCEEDED	9/1/2016	Stationary Source
2016	6256		EL CENTRO	Condition No. 9 & 13	Operated more than allowed	9/20/2016	Stationary Source
2016	6270		EL CENTRO	CONDITION NO.7	OPACITY EMISSIONS EXCEEDED	8/1/2016	Dust/Opacity
2016	6279		EL CENTRO	CONDITION B.3.a	NITROGEN OXIDE EMISSION CONCENTRATION SHAL NOT EXCEED 2.0 PPMV	11/17/2016	Stationary Source
2016	5986, 5987		CALEXICO	CONDITION NO.5; 201.A	PHASE I VAPOR RECOVERY / AUTHORITY TO CONSTRUCT	4/11/2016	Service Station

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2016	6232, 6233		EL CENTRO	CONDITION NO.9 & 14	DUST CONTROL EQUIPMENT / LOG MAINTENANCE AVAILABLE	6/20/2016	Paperwork
2016	6295, 6297		CALEXICO	201.B / 112.D.5	PERMIT TO OPERATE	09/07/16 & 09/13/16	Permit
2016		2382	EL CENTRO	B.10	UPDATE EQUIPMENT LIST	12/19/2016	Permit
2016		2384	EL CENTRO		SUBMIT TO THE APCD A UPDATED EQUIPMENT LIST FOR THE FACILITY (BOILER)	12/28/2016	Paperwork
2016		2393	CALEXICO		FIX THE GAPS ON THE PAINT BOOTH DOORS AND PUT NEW EXHAUST FILTERS.	2/10/2016	Stationary Source
2016		2405	CALEXICO		SUBMIT MISSING MONTHS FROM THE 2015 ANNUAL REPORT	4/19/2016	Annual Report
2016		2410	EL CENTRO		THE PAINT BOOTH SHALL BE EQUIPPED WITH A PRESSURE DIFFERENCE GAUGE (MAGNEHILIC GAUGE) TO MONITOR THE PRESSURE OF EXHAUST FILTER IN THE SPRAY BOOTH	5/2/2016	Stationary Source
2016		2421	EL CENTRO		FIX THE DUST COLLECTOR AT THE BIG PRESS LINE	5/23/2016	Stationary Source
2016		2425	CALEXICO		OPERATION OF THIS EQUIPMENT SHALL BE IN COMPLIANCE. SUBMIT APPLICATION.	8/16/2016	Permit
2016		2430	CALEXICO		SUBMIT TO THE APCD A CURRENT EQUIPMENT LIST FOR THE SERVICE STATION BY THE DUE DATE BELOW	3/8/2016	Paperwork
2016		2431	CALEXICO		MOVE VAPOR SENSOR TO THE CORRET LOCATION AND RESTEST THE VAPOR SENSOR BY THE DUE DATE BELOW. TEST #203-HEXHIBITION #10/VE204	3/9/2016	Service Station
2016		2452	HEBER		EQUIPMENT UPDATE	3/23/2016	Paperwork
2016		2454	CALEXICO		TEST VAPOR RECOVERY SYSTEM (PHASE I & II)	4/4/2016	Service Station
2016		2457	EL CENTRO	CONDITION #25 & 26	INSTALL A FUEL METER ON THE HURST BOILER TO BE IN COMPLIANCE WITH PERMIT CONDITION #25 & 26.	5/4/2016	Service Station
2016		2459	CALEXICO		SUBMIT TEST RESULTS OF VEPOR RECOVERY SYSTEM OF PHASE I & II	5/17/2016	Paperwork
2016		2463	EL CENTRO	CONDITION #D-1	SUBMIT DAILY TONNAGE OF HAY COMPRESSED FOR THE MONTH OF SEPTEMBER 2015	1/6/2016	Stationary Source
2016		2465	EL CENTRO		EQUIPMENT UPDATE	3/29/2016	Paperwork
2016		2473	CALEXICO	CONDITION 18	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2474	CALEXICO	CONDITION 18	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2475	CALEXICO	CONDITION 17	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2016		2478	EL CENTRO	CONDITION 12	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2479	EL CENTRO	CONDITION 4	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2480	EL CENTRO	CONDITION 15	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2487	EL CENTRO	CONDITION 14	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2493	EL CENTRO	CONDITION 19	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2495	EL CENTRO	CONDITION 16	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2503	EL CENTRO		SUBMIT TO THE APCD AN APPLICATION STATING THE PAINTING OPERATION'S AT THE FACILITY, TO HAVE THIS PERMIT AMENDED, PTO #XXXX	5/31/2016	Permit
2016		2505	EL CENTRO		SUBMIT TO THE APCD APPLICATION WITH NEW FACILITY LOCATION AND UPDATED EQUIPMENT LIST	6/1/2016	Paperwork
2016		2508	CALEXICO	CONDITION 19	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2509	EL CENTRO	CONDITION 9	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2512	CALEXICO	CONDITION 15	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2513	CALEXICO	CONDITION 15	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2519	CALEXICO	CONDITION 10	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2523	EL CENTRO	CONDITION 15	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2527	EL CENTRO	CONDITION D.3	SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2534	CALEXICO		TEST THE FUEL TANK BY THE DUE DATE BELOW	7/21/2016	Service Station
2016		2538	EL CENTRO	CONDITION 14	TEST THE PHASE I & PHASE ii VAPOR RECOVERY AS STATED IN PTO CONDITION #XXXX BY THE DUE DATE BELOW	10/5/2016	Service Station
2016		2540	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2016	Annual Report
2016		2545	HEBER		SUBMIT TEST RESULTS TO ICAPCD.	8/9/2016	Paperwork
2016		2551	HEBER		Not Listed		Unknown
2016		2552	HEBER		Not Listed		Unknown
2016		?	CALEXICO	CONDITION 1	OPERATION OF THIS EQUIPMENT SHALL BE IN COMPLIANCE WITH ALL DATA AND SPECIFICATION SUBMITTED WITH APPLICATION. NEEDS NEW BATTERY TO DO THE INSPECTION.	8/16/2016	Stationary Source
2017	5439		EL CENTRO	CONDITION C.1	UNIT 2 STACK EMISSIONS SHALL BE LIMITED TO THE FOLLOWING STANDARDS: NOx 35LBS/HR	7/27/2017	Stationary Source

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2017	5951		EL CENTRO	CONDITION 11	PERMITEE SHALL NOT APPLY MORE THAN 3 GALLONS PER DAY OF COATING MATERIALS AND CLEANING SOLVENTS	4/27/2017	Stationary Source
2017	6237		EL CENTRO	CONDITION N. 6	ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT	1/5/2017	Service Station
2017	6240		EL CENTRO	RULE 201 SECTION B	ALL HOLDERS OF AN ATC OR PTO SHALL PAY ANNUAL RENEWAL FEE TO THE DISTRICT NO LATER THAN JAN. 31, IF RENEWAL FEE IS NOT PAID BY THAT TIME THE FEE SHALL BE INCREASED BY 1/2 THE AMOUNT	3/28/2017	Fee
2017	6301		EL CENTRO	CONDITION A.6	OPACITY OF EMISSION FROM ANY PROCESS SHALL NOT EXCEED 20% FOR A PERIOD OR PERIODS AGGREGATING MORE THAN 3 MINUTES IN ANY ONE HOUR	1/17/2017	Dust/Opacity
2017	6325		EL CENTRO	CONDITION 19	ANNUAL REPORT	6/2/2017	Annual Report
2017	6328		CALEXICO	CONDITION 19	ANNUAL REPORT	6/2/2017	Annual Report
2017	6329		EL CENTRO	CONDITION 20	ANNUAL REPORT	6/2/2017	Annual Report
2017	6332		EL CENTRO	CONDITION 15	ANNUAL REPORT	6/2/2017	Annual Report
2017	6343		EL CENTRO	CONDITION 15	ANNUAL REPORT	6/13/2017	Annual Report
2017	6346		CALEXICO	CONDITION 17	ANNUAL REPORT	6/13/2017	Annual Report
2017	6347		EL CENTRO	CONDITION 17	ANNUAL REPORT	6/13/2017	Annual Report
2017	6354		EL CENTRO	CONDITION 7	ANNUAL REPORT	6/14/2017	Annual Report
2017	6355		EL CENTRO	CONDITION 15	ANNUAL REPORT	6/14/2017	Annual Report
2017	6358		CALEXICO	CONDITION 9	ANNUAL REPORT	6/14/2017	Annual Report
2017	6364		EL CENTRO	CONDITION 13	ANNUAL REPORT	6/14/2017	Annual Report
2017	6368		EL CENTRO	CONDITION 15	PERFORMANCE TESTS MUST BE DONE AT LEAST ONCE IN A 12 MONTH PERIOD	10/20/2017	Stationary Source
2017	5437, 6282		CALEXICO	CONDITION 7 & 18	7- COMPONENTS SHALL BE MAINTAINED TO BE LEAK FREE AND VAPOR TIGHT. 18-ISD SHALL BE KEPT IN ACTIVE OPERATION AT ALL TIME	6/28/2017	Service Station
2017		2593	EL CENTRO	CONDITION C.2	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2594	EL CENTRO	CONDITION 20	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2595	EL CENTRO	CONDITION 19	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2017		2597	HEBER	CONDITION E.3.	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2599	EL CENTRO	CONDITION 19	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2605	EL CENTRO	CONDITION C.4.	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2606	EL CENTRO	CONDITION 19	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2608	EL CENTRO	CONDITION 19	SUBMIT ANNUAL REPORT	3/1/2017	Annual Report
2017		2564	EL CENTRO		SUBMIT TO THE APCD APPLICATION OF ALL NEW EQUIPMENT AT THE LOCATION BY THE DUE DATE BELOW	8/1/2017	Permit
2017		2565	EL CENTRO		SUBMIT TO THE APCD APPLICATION TO CHANGE ADDRESS LOCATION BY THE DUE DATE BELOW	8/1/2017	Paperwork
2017		2556	CALEXICO		TEST THE VAPOR RECOVERY SYSTEM (PHASE I & II)	3/8/2017	Service Station
2017		2572	EL CENTRO		Not Listed		Unknown
2017		2571	EL CENTRO		SUBMIT ANNUAL REPORT	4/11/2017	Annual Report
2017		2585	EL CENTRO		Not Listed		Unknown
2017		2584	CALEXICO		Not Listed		Unknown
2017		2562	EL CENTRO		SUBMIT TO THE APCD A PLAN TO CONTROL THE DUST OF THE HAY STORAGE AREA.	7/18/2017	Dust/Opacity
2017		2614	EL CENTRO		TEST THE FUEL TANK (VAPOR RECOVERY)	11/27/2017	Service Station
2017		2626	EL CENTRO		SUBMIT TO THE APCD AN APPLICATION FOR TRANSFER OF OWNERSHIP	12/28/2017	Paperwork
2017		2627	EL CENTRO		SUBMIT TO THE APCD AN APPLICATION FOR TRANSFER OF OWNERSHIP	12/28/2017	Paperwork
2017		2619	HEBER		Not Listed		Unknown
2018	6312		CALEXICO	CONDITION #7	PERMITTEE SHALL NOT APPLY COATINGS OUTSIDE THE PAINT BOOTHS	3/15/2018	Stationary Source

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018	6313		CALEXICO	COND. 5 & 14	NO AIR CONTAMINANT SHOULD BE RELEASED INTO THE ATMOSPHERE WHICH CAUSES A PUBLIC NUISANCE, CAUSED BY PERMITTED OPERATIONS. PERMITTEE SHALL KEEP ADEQUATE RECORDS TO VERIFY LEVELS OF USAGE OF THE VARIOUS COATINGS ON A DAILY BASIS. THESE RECORDS MUST BE RETAINED FOR THE PREVIOUS TWO YEAR PERIOD, WITH THE INFORMATION INCLUDING: ADDITIVE, COATING, CATALYST, AND REDUCER USED: MIX RATIO OF COMPONENTS USED AND VOC CONTENT OF COMPONENTS USED.	11/14/2018	Stationary Source
2018	6374		EL CENTRO	CONDITION A.6	OPACITY OF EMISSION FROM ANY PROCESS SHALL NOT EXCEED 20% ETC.	2/12/2018	Dust/Opacity
2018	6378		EL CENTRO	Condition 10	Permittee shall not operate the stationary emergency standby generator set for non emergency use between 7:30 AM and 3:30 PM on days when school is in session. Non emergency use includes maintenance and testing.	5/3/2018	Stationary Source
2018	6381		EL CENTRO	CONDITION # 18	PERMITTEE SHALL MAINTAIN AN OPERATIONAL AND MAINTENANCE MANUAL FOR THE PHASE 1 AND PHASE 2 VAPOR RECOVERY SYSTEMS OF THE FACILITY. THE MANUALS MUST BE KEPT AT THE FACILITYAND MADE AVAILABLE TO THE APCD UPON REQUEST	3/19/2018	Paperwork
2018	6385		HEBER	COND. B1	UNDER ALL NORMAL OPERATING CONDITIONS (MAINTENANCE, EVACUATION SKID SYSTEM VAPOR RECOVERING UNIT PURGING, INDIVIDUAL ORMAT ENERGY CONVERTER OEC VAPOR RECOVERY UNITS PURGING UNITS AND FUGITIVE DAILY EMISSIONS THE TOTAL ISOPENTANE EMISSIONS SHALL NOT EXCEED 99.6 POUNDS PER DAY FROM THE ENTIRE FACILITY, AS DETERMINED BY NORMAL INVENTORY AND MASS BALANCE PROCEDURES.	8/2/2018	Stationary Source

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018	6397		EL CENTRO	COND. NO. 15	THE PERMITTEE SHAL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR THE UNIT. THE ANNUAL REPORT SHALL BE SUBMITTED TO THE ICAPCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/14/2018	Paperwork
2018	6398		EL CENTRO	COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/14/2018	Annual Report
2018	6399		EL CENTRO	COND. NO. B.4	PERMITTEE SHALL ANNUALLY SUBMIT TO THE ICAPCD A REPORT CONTAINING THE DAILY, MONTHLY AND ANNUAL PELLET PRODUCTION IN TONS. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/14/2018	Annual Report
2018	6404		EL CENTRO	COND. NO. 20	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/14/2018	Annual Report
2018	6405		EL CENTRO	COND. NO. 13	THE PERMITTEE SHAL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR THE UNIT. THE ANNUAL REPORT SHALL BE SUBMITTED TO THE ICAPCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/14/2018	Paperwork

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018	6431		EL CENTRO	COND. NO. D.2	PERMITTEE SHALL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE DAILY AND MONTHLY ABRASIVE CONSUMPTION THE DAILY AND MONTHLY POUNDS OF POWDER AND REGULAR COATING USED AND DAILY AND MONTHLY GALLONS OF SOLVENTS USED FOR CLEANUP AND SURFACE PREPARATION. THIS DOCUMENT SHALL BE SUBMITTED TO THE APCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/7/2018	Annual Report
2018	6432		EL CENTRO	COND. NO. 18	PERMITTEE SHALL SUBMIT TO APCD AN ANNUAL REPORT CONTAINING THE DAILY HOURS OF OPERATION OF ABRASIVE CONSUMPTION, INCLUDING THE TOTAL POUNDS AND BRAND NAME OF ABRASIVES ON A SEPARATE SECTION INCLUDE THE HOURS OF OPERATION AND FUEL CONSUMPTION OF THE DIESEL ENGINE PER MONTH. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	5/7/2018	Annual Report
2018	6472		EL CENTRO	COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/14/2018	Annual Report
2018	6475		EL CENTRO	COND. C.4.	THE PERMITTEE SHALL SUBMIT AN ANNUAL REPORT, DUE BY THE END OF FEBRUARY OF EACH OPERATING YEAR	5/7/2018	Annual Report
2018	6477		EL CENTRO	COND NO. 15	PERMITTE SHALL ANNUALLY SUBMIT TO THE ICAPCD A REPORT CONTAINING THE DAILY AND MONTHLY CONSUMPTION OF ANY COATINGS AND SOLVENTS FOR 2017. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THE APCD NO LATER THAN FEBRUARY 28TH.	5/7/2018	Annual Report

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018	6480		EL CENTRO	COND. NO. 19	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/7/2018	Annual Report
2018	6484		EL CENTRO	COND. NO. 15	PERMITTEE SHAL SUBMIT TO THE APC AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER DAY MONTH FOR MAINTENANCE TESTING AND OR EMERGENCY USE FOR THE UNIT. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	6/15/2018	Annual Report
2018	6488		EL CENTRO	COND. NO. 15	PERMITTEE SHAL SUBMIT TO THE APCD AN ANNUAL REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR THE UNIT. THIS REPORT SHALL REACH THE OFFICES OF THE APCD BY THE END OF FEBRUARY EACH OPERATING YEAR.	5/14/2018	Annual Report
2018	6489		EL CENTRO	COND. NO. 16	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/14/2018	Annual Report
2018	6495		HEBER	COND. NO. 7	ALL APPLICABLE COMPONENTS SHALL BE MAINTAINED TO A STATE THAT IS LEAK FREE AND VAPOR TIGHT.	8/16/2018	Service Station
2018	6496		CALEXICO	COND. #15	PERMITTEE SHALL KEEP ADEQUATE RECORDS TO VERIFY THE LEVELS OF USAGE OF THE VARIOUS COATINGS ON A DAILY BASIS. THESE RECORDS MUST BE RETAINED FOR THE PREVIOUS THREE YEAR PERIOD, WITH INFORMATION INCLUDING 1ADDITIVE COATING CATALYST AND OR REDUCER USED AND THE AMOUNT. 2. MIX RATIO OF COMPONENTS USED. 3. VOC CONTENT OF COATING AS APPLIED.	9/26/2018	Paperwork

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018	6504		CALEXICO	COND. NO. 14	THE PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR THE UNIT. THE ANNUAL REPORT SHALL BE SUBMITTED TO THE ICAPCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/21/2018	Annual Report
2018	6505		EL CENTRO	COND. NO. 20	PERMITTEE SHALL ANNUALLY SUBMIT TO THE IMPERIAL COUNTY APCD A REPORT CONTAINING THE GASOLINE THROUGHPUT FOR THE PRECEDING CALENDAR YEAR. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THIS OFFICE NO LATER THAN FEBRUARY 28TH.	5/21/2018	Annual Report
2018	6508		EL CENTRO	COND. NO. 16	PERMITTE SHALL ANNUALLY SUBMIT TO THE ICAPCD A REPORT CONTAINING THE DAILY AND MONTHLY CONSUMPTION OF ANY COATINGS AND SOLVENTS FOR 2017. THIS ANNUAL REPORT SHALL BE SUBMITTED TO THE APCD NO LATER THAN FEBRUARY 28TH.	5/21/2018	Annual Report
2018	6510		EL CENTRO	COND. NO. 15	THE PERMITTEE SHALL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR THE UNIT. THE ANNUAL REPORT SHALL BE SUBMITTED TO THE ICAPCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/14/2018	Annual Report
2018	6511		CALEXICO	COND. NO. 9	THE PERMITTEE SHAL ANNUALLY SUBMIT TO THE AIR DISTRICT A REPORT CONTAINING THE MONTHLY FUEL CONSUMPTION AND HOURS OPERATED PER MONTH FOR THE UNIT. THE ANNUAL REPORT SHALL BE SUBMITTED TO THE ICAPCD BY THE END OF FEBRUARY OF EACH OPERATING YEAR.	5/14/2018	Paperwork
2018	6512		EL CENTRO	421.B	NO PERSON SHALL USE OPEN OUTDOOR FIRE FOR THE PURPOSE OF DISPOSAL OF DISPOSAL OR BURNING OF PETROLEUM WASTES, DEMOLITION DEBRIS, TIRES, TAR, TREES, WOOD, WASTE, TRASH OR OTHER COMBUSTIBLE OR FLAMMABLE SOLID OR LIQUID WASTE: OR FOR METAL SALVAGE OR BURNING OF MOTOR VEHICLE BODIES.	4/30/2018	Open burn

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018	6532		HEBER	APCD RULE 201	EACH PERSON WHO USES OR OPERATES ANY ARTICLE MACHINE EQUIPMENT OR OTHER CONTRIVANCE THAT EMITS OR CONTROLS AIR CONTAMINANTS IS REQUIRED TO HAVE A PERMIT. A SINGLE PERMIT TO OPERATE MAY BE ISSUED FOR ALL COMPONENTS OF AN INTEGRATED SYSTEM OR PROCESS.	8/27/2018	Permit
2018	6289, 6290		EL CENTRO	V-2834, SEC III. 3542, B.3	SILOXANE USAGE AND MOLD RESISTANT PRODUCTS SHALL BE LIMITED TO [XXXX] LBS/DAY; [XXXX] LBS/QRTR; [XXXX] LBS/YEAR	2/13/2018	Stationary Source
2018	6315, 6316		EL CENTRO	Conditions No. 7, 17 and 18	No.7 All applicable components shall be maintained to a state that is leak free and vapor tight. No. 17 Permittee shall maintain an operational and maintenance manual for the phase 1 and 2 vapor recovery systems of the facility. The manuals must be kept at the facility and made available to the APCD upon request. No. 18 The In-Station diagnostics system (ISD) shall be kept in active operating mode at all times as specified in operational and maintenance manuals.	4/30/2018	Service Station
2018		2624	EL CENTRO	RULE 201	LOCK OUT PUMP #4 AND REPLACED CRACKED NOZZLE.	7/12/2018	Service Station
2018		2628	EL CENTRO		REPAIR THE INCLINED AUGER IN THE PELLET MILL.	1/19/2018	Stationary Source
2018		2646	CALEXICO		TEST PHASE I & II VAPOR RECOVERY SYSTEM	4/5/2018	Service Station
2018		2735	EL CENTRO		MAINTAIN DUST CONTROL AT ALL TIMES. DIFFERENT AREAS.	7/6/2018	Dust/Opacity
2018		2655	HEBER		CONDUCT A PHASE I VAPOR RECOVERY TEST ON THE FULE TANK.	8/13/2018	Service Station
2018		2740	CALEXICO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2647	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2648	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2695	CALEXICO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2696	CALEXICO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2704	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2710	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2711	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018		2713	CALEXICO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2719	CALEXICO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2723	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report
2018		2737	EL CENTRO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report

Table F.1-4a. NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Year	NOV	NTC	City	RULE REG	VIOLATION DESCRIPTION	Date NOV-NTC	Summarized Violation
2018		2740	CALEXICO		SUBMIT ANNUAL REPORT	3/1/2018	Annual Report

Notes:

1. ICAPCD NTCs and NOVs issued between 2016 and 2018 were filtered based on location. This list represents all NTC and NOV issued to sources located within El Centro, Heber, and Calexico.

Abbreviations:

NOV - Notice of Violation

NTC - Notice to Comply

PTO - Permit to Operate

Table F.1-4b. Types of NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Violation Type	Year			Total NOV/NTC	Percentage
	2016	2017	2018		
Annual Report	32	20	29	81	52%
Dust/Opacity	1	2	2	5	3%
Fee		1		1	1%
Open burn			1	1	1%
Paperwork	8	3	5	16	10%
Permit	5	1	1	7	4%
Service Station	6	4	5	15	10%
Stationary Source	16	3	6	25	16%
Unknown	2	4		6	4%
Total NOV/NTC	**70**	**38**	**49**	**157**	100%

Notes:
1. Table F-4a was used to determine categories of NOVs and NTCs based on the description of the violation. The table above uses data provided in Table F-4a to total the number of NTC and NOV in each category for facilities within El Centro, Heber, and Calexico from 2016 to 2018.

Abbreviations:
NOV - Notice of Violation
NTC - Notice to Comply

Table F.1-4c. Summary of NOVs and NTCs Issued within the El Centro-Heber-Calexico Corridor
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

	2016	2017	2018	Total
Total # of NTCs and NOVs	70	38	49	157
# of Facilities with a NTC or NOV	47	29	45	86
Non-Compliance Rate	**22%**	**14%**	**21%**	

Notes:
1. The table above uses data provided in Table F-4a to tally the number of NTCs and NOVs by facility within the El Centro-Heber-Calexico Corridor from 2016 to 2018. The non-compliance rate is defined as the number of permitted facilities with a NTC or NOV over the total number of permitted facilities.

Constants:

212	Number of Permitted Facilities in El Centro-Heber-Calexico Corridor as of February 2018

Abbreviations:

NOV - Notice of Violation

NTC - Notice to Comply

PTO- Permit to Operate

Appendix F.2 – Additional CARB Enforcement Programs

Heavy-Duty Diesel Vehicles

Idling: Idling and opacity inspections are performed to ensure a heavy-duty vehicle (HDV) is compliant with emission standards and is not violating CARB's Idling regulation. Idling for more than five minutes is prohibited unless the HDV is certified clean idle and more than 100 feet away from a school or restricted area (exceptions apply).

Off-Road Construction Equipment (Off-Road Regulation): Construction equipment is a major contributor to air pollution throughout the State, especially when large construction projects are adjacent to neighborhoods. To address this source of air pollution, CARB adopted the nation's first regulation aimed at cleaning up 'off-road' construction equipment such as bulldozers, graders, and backhoes. The Off-Road Regulation requires off-road fleets to meet fleet average emission standards and be equipped with Best Available Control Technology (BACT), (a few specific exceptions apply).

Smart Way: The Tractor-Trailer Greenhouse Gas (GHG) Regulation requires 53-foot or longer dry van or refrigerated van trailers and the tractors that pull them on California highways to use certain equipment that the U.S. Environmental Protection Agency Smart Way program has verified or designated to meet their efficiency standards.

Transport Refrigeration Units (TRUs): Transport Refrigeration Units are refrigeration systems powered by diesel internal combustion engines designed to refrigerate or heat perishable products that are transported in various containers, including semi-trailers, truck vans, shipping containers, and rail cars. Since diesel particulate matter has been identified as a toxic air contaminant, CARB adopted an Airborne Toxic Control Measure (ATCM) for TRUs and TRU generator sets. CARB staff inspect TRUs to ensure that the units are meeting labeling and in-use performance standards identified in the TRU regulation.

Drayage: The Drayage Truck Regulation is part of CARB's ongoing efforts to reduce PM and NOx emissions from diesel-fueled engines and improve air quality associated with goods movement. Heavy-Duty Vehicles that carry goods to or from a port or intermodal facility are required to be equipped with a 2007 or newer model year engine. This requirement becomes stricter in 2023, when Drayage trucks are required to be equipped with a 2010 or newer model year engine, because Drayage trucks will be required to the meet the standards of the State-wide Truck and Bus regulation.

State-wide Truck and Bus (STB): The Statewide Truck and Bus Regulation requires diesel trucks with a Gross Vehicle Weight Rating (GVWR) greater than 14,000 pounds that operate in California to install diesel particulate filters or replace older engines with cleaner engine technology on a schedule based on the model year of the engine and GVWR. For regulation timeline visit at https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation).

Cargo Handling Equipment (CHE) – The Mobile Cargo Handling Equipment Regulation was adopted in 2005 to reduce toxic and criteria emissions to protect public health. This regulation

was fully implemented by the end of 2017, hence the lack of data prior to 2017. As part of CARB's continuing efforts to reduce greenhouse gas, diesel PM, and NOx emissions in California, CARB staff investigate opportunities to reduce idling emissions from cargo handling equipment used at ports and intermodal rail yards. Cargo handling equipment is used to transfer goods or perform maintenance and repair activities and includes equipment such as yard trucks, rubber-tired gantry cranes, top handlers, side handlers, forklifts, and loaders.

Consumer Products

Composite Wood Products – CARB's ATCM to control formaldehyde emissions from composite wood specifically focuses on three products: hardwood plywood, particleboard, and medium density fiberboard. Investigators in the Composite Wood Products program purchase samples of regulated products from outlets all over California. They inspect products and packaging for compliance with labeling requirements and send selected products to the laboratory for testing.

APPENDIX G
EMISSION REDUCTION CALCULATIONS

Table G-1. Estimated Emission Reductions and Cost Effectiveness Related to Strategy I-1, Wood Burning Devices
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Old Heating Stove	New Heating Stove	Project Life	Emission Reductions per Unit Replaced[1]			Annual Emission Reductions per Unit Replaced[2]			Cost of Product[3]	Capital Recovery Factor, CRF	Annualized Cost per Unit[4]	Cost Effectiveness ($/ton)		
			$PM_{2.5}$	NOx	ROG	$PM_{2.5}$	NOx	ROG				$PM_{2.5}$	NOx	ROG
		Years	tons	tons	tons	tons/yr	tons/yr	tons/yr						
Fireplace	Certified non-catalytic wood stove or insert	20	1.53	0.16	1.21	0.08	0.01	0.06	$1,800	0.055	$100	$1,307	$12,346	$1,653
Uncertified wood stove or insert	Certified non-catalytic wood stove or insert	20	0.23	0.01	0.38	0.01	0.00	0.02	$1,800	0.055	$100	$8,503	$227,677	$5,182
Fireplace	Certified catalytic wood stove or insert	20	1.50	0.16	1.19	0.07	0.01	0.06	$3,000	0.055	$166	$2,217	$20,329	$2,804
Uncertified wood stove or insert	Certified catalytic wood stove or insert	20	0.21	0.01	0.36	0.01	0.00	0.02	$3,000	0.055	$166	$15,964	$309,834	$9,138
Fireplace	Certified pellet stove or insert	20	1.53	0.15	1.29	0.08	0.01	0.06	$2,680	0.055	$149	$1,941	$19,916	$2,301
Uncertified wood stove or insert	Certified pellet stove or insert	20	0.24	0.00	0.47	0.01	0.00	0.02	$2,680	0.055	$149	$12,434		$6,332
Fireplace	Ductless mini-split heat pump	15	1.16	0.13	0.97	0.08	0.01	0.06	$2,000	0.072	$144	$1,858	$16,541	$2,235
Uncertified wood stove or insert	Ductless mini-split heat pump	15	0.20	0.02	0.35	0.01	0.00	0.02	$2,000	0.072	$144	$11,055	$133,657	$6,153
Fireplace	Electric home heating stove or insert	13	1.01	0.11	0.84	0.08	0.01	0.06	$200	0.082	$16	$212	$1,890	$255
Uncertified wood stove or insert	Electric home heating stove or insert	13	0.17	0.01	0.30	0.01	0.00	0.02	$200	0.082	$16	$1,263	$15,273	$703
Fireplace	Propane home heating stove or insert	13	1.01	0.11	0.84	0.08	0.01	0.06	$1,000	0.082	$82	$1,062	$10,188	$1,278
Uncertified wood stove or insert	Propane home heating stove or insert	13	0.17	0.01	0.30	0.01	0.00	0.02	$1,000	0.082	$82	$6,316	$183,938	$3,519
Fireplace	Natural gas home heating stove or insert	13	1.01	0.11	0.84	0.08	0.01	0.06	$1,600	0.082	$132	$1,699	$15,759	$2,044
Uncertified wood stove or insert	Natural gas home heating stove or insert	13	0.17	0.01	0.30	0.01	0.00	0.02	$1,600	0.082	$132	$10,106	$181,628	$5,630
	AVERAGE		**0.72**	**0.07**	**0.69**	**0.045**	**0.004**	**0.043**	**$1,754**		**$113**	**$5,424**	**$88,383**	**$3,516**

Notes:

[1] Results from CARB Draft Woodstove Reduction Calculator. Available at: https://ww2.arb.ca.gov/resources/documents/cci-quantification-benefits-and-reporting-materials?corr. Accessed: August 2019.

[2] Annual emission reductions are based on the expected life of the equipment.

[3] Product costs estimated from internet searches as follows:

Certified non-catalytic wood stove https://www.usstove.com/product/3000-sq-ft-epa-certified-wood-stove-with-blower/

Certified catalytic wood stove Blaze King Industries Chinook CK30.2. Phone quote (661) 944-2359

Pellet stove https://www.usstove.com/product/2000-sq-ft-multi-fuel-stove-2/

Mini-split heat pump https://www.acwholesalers.com/cooling/lg-mini-split-heat-pumps.html?gclid=EAIaIQobChMI-s_HhciD5AIVUFuGCh1R2gfnEAAYBCAAEgL_6vD_BwE

Electric Stove Heaters https://www.homedepot.com/b/Heating-Venting-Cooling-Fireplaces-Freestanding-Stoves-Electric-Stove-Heaters/N-5yc1vZc4li

Propane stove https://www.amazon.com/Ashley-AGVF340LP-Vent-Free-Propane-Firebox/dp/B01HV6QD3S/ref=zg_bs_3735461_17?_encoding=UTF8&psc=1&refRID=Z65WMG1DZ7T1JME0X36T

Natural gas stove https://www.efireplacestore.com/cui-vfp30ca30fn.html

[4] Assumes a discount rate, i, of 1%.

Abbreviations:

CRF - Capital Recovery Factor

NOx - nitrogen oxides

$PM_{2.5}$ - particulate matter less than 2.5 microns in diameter

ROG - reactive organic gases

Table G-2. Estimated Emission Reductions and Cost Effectiveness Related to Strategy M-3, Parking Lot Paving Projects
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Surface Area[1] Acres/Project	Number of Vehicle Passes per Project[1] Trips/Day/Project	Vehicle Miles Traveled per Project VMT/yr	Emission Factor[2,3] lbs PM_{10}/VMT	Uncontrolled Emissions per Project[2] ton/yr		Controlled Emissions per Project[4] ton/yr		Emission Reductions per Project[5] ton/yr	
				PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
1.5	250	4,418	2.0	4.4	0.44	1.99	0.20	1.97	0.20

Cost Effectiveness

Project Life, n (years)	Discount Rate, i	Capital Recovery Factor, CRF	Estimated Cost per Project[1]	Annualized Cost per Project	Cost Effectiveness ($/ton)	
					PM_{10}	$PM_{2.5}$
7	1%	0.149	$406,480	$60,414	$30,698	$307,131

Constants:

0.5943 PM_{10} fraction of total PM Emissions[2]

0.0594 $PM_{2.5}$ fraction of total PM Emissions[2]

55% Control efficiency based on twice daily watering

99% Control efficiency for paving

Notes:

[1] Assumptions based on the Calexico Unified School District Parking Lot Paving Project.

[2] Calculation methodology and emission factor based on CARB Miscellaneous Process Methodology 7.10 - Unpaved Road Dust, Non-Farm Roads. Available at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-10_2012.pdf. Accessed: August, 2019.

[3] $PM_{2.5}$ emissions (tons/yr) = [PM_{10} (tons/yr)/PM_{10} fraction of total PM emissions]*$PM_{2.5}$ fraction of total PM emissions

[4] Assumes twice daily watering. Control efficiency based on Western Regional Air Partnership Fugitive Dust Handbook, Table 6-6. Control Efficiencies for Control Measures for Unpaved Roads. Available at: https://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf. Accessed: August 2019.

[5] Assumes paving of lots eliminates 99% of fugitive windblown dust emissions from the source. Control efficiency based on Western Regional Air Partnership Fugitive Dust Handbook, Table 6-6. Control Efficiencies for Control Measures for Unpaved Roads. Available at: https://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf. Accessed: August 2019.

Abbreviations:

CRF - Capital Recovery Factor

lbs - pounds

$PM_{2.5}$ - particulate matter less than 2.5 microns in diameter

PM_{10} - particulate matter less than 10 microns in diameter

VMT - vehicle miles traveled

Table G-3. Estimated Emission Reductions Related to Strategy M-5, Strategic Updates to Policy #34
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Crop	Max Burn Area[1] (acres/day)		Fuel Loading[2] (tons/acre)	$PM_{2.5}$ Emission Factor[2] (lbs/ton burned)	Max $PM_{2.5}$ Emissions (tons/day)		$PM_{2.5}$ Emission Reduction (tons/day)
	Current	Amended			Current	Amended	
Wheat	1,040	830	1.9	10.1	10.0	8.0	2.0
Grasses	960	770	3.2	15.2	23.3	18.7	4.6
Total	**2,000**	**1,600**	--	--	**33.3**	**26.7**	**6.6**

Notes:

[1] While a variety of crops are burned in Imperial County, the majority are wheat and grasses. The assumed breakdown of acres burned was derived from the 2009-2018 statistics.

[2] California Air Resources Board. 2006. Waste Burning Emission Factor Table. Available at: https://www.arb.ca.gov/smp/techtool/waste-burn-emission-factors6.pdf. Accessed: August 2019.

Abbreviations:

lbs - pounds

$PM_{2.5}$ - particulate matter less than 2.5 microns in diameter

Table G-4. Estimated Emission Reductions and Cost Effectiveness Related to Strategy M-6, School Bus Replacement
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

		Baseline Bus					Electric Bus	Units
Emissions								
Project Life		10						(years)
Total Distance[1]		7,049						(miles/year/bus)
Expected First Year of Operation of Electric Bus		2020	2021	2022	2023	2024	--	
Baseline Engine Model Year[1]		1999	1999	1999	1999	1999	--	
Percent Operation in California		100%						
Equipment Deterioration Life[2,3]		26	27	28	29	30	5	(years)
Total Equipment Activity[4,5]		183,274	190,323	197,372	204,421	211,470	35,245	(miles)
Emission Factor	**NO_X**	10.33	10.33	10.33	10.33	10.33	0	(g/mile)
	ROG	0.28	0.28	0.28	0.28	0.28	0	(g/mile)
	PM	0.266	0.266	0.266	0.266	0.266	0	(g/mile)
Deterioration Rate	**NO_X**	0.072	0.072	0.072	0.072	0.072	0	(g/mile/10K miles)
	ROG	0.036	0.036	0.036	0.036	0.036	0	(g/mile/10K miles)
	PM	0.0116	0.0116	0.0116	0.0116	0.0116	0	(g/mile/10K miles)
Deterioration Product[6]	**NO_X**	1.320	1.370	1.421	1.472	1.523	0	(g/mile)
	ROG	0.660	0.685	0.711	0.736	0.761	0	(g/mile)
	PM	0.213	0.221	0.229	0.237	0.245	0	(g/mile)
Emissions per Bus[7]	**NO_X**	0.091	0.091	0.091	0.092	0.092	0	(tons/year)
	ROG	0.007	0.007	0.008	0.008	0.008	0	(tons/year)
	PM	0.004	0.004	0.004	0.004	0.004	0	(tons/year)
Emission Reductions per Bus	**NO_X**	0.091	0.091	0.091	0.092	0.092	--	(tons/year)
	ROG	0.007	0.007	0.008	0.008	0.008	--	(tons/year)
	PM	0.004	0.004	0.004	0.004	0.004	--	(tons/year)

Table G-4. Estimated Emission Reductions and Cost Effectiveness Related to Strategy M-6, School Bus Replacement
Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

		Baseline Bus					Electric Bus	Units
Cost Effectiveness								
Discount Rate, i		1%						--
Capital Recovery Factor, CRF		0.106						--
Estimated Cost per Bus[1]		$392,825						($/bus)
Annualized Cost per Project		$41,475						($/year)
Cost Effectiveness	**NO_X**	$458,190	$456,203	$454,232	$452,279	$450,342	--	($/ton)
	ROG	$5,679,716	$5,530,383	$5,388,701	$5,254,098	$5,126,055	--	
	PM	$11,152,829	$10,965,484	$10,784,329	$10,609,062	$10,439,401	--	

Notes:

[1] Based on Calexico Unified School District Electric School Bus Replacement Project

[2] Baseline Equipment Deterioration Life = Expected First Year of Operation - Baseline Engine Model Year + Project Life/2

[3] Electrified Equipment Deterioration Life = Project Life/2

[4] Baseline total equipment activity = total miles (miles/yr) * Baseline Equipment Deterioration Life

[5] Electrified total equipment activity = total miles (miles/yr) * Electrified Equipment Deterioration Life

[6] Deterioration product = Baseline deterioration rate / 10000 * Baseline Total Equipment Activity

[7] Annual Emissions = Pollutant Emission Factor + Pollutant Deterioration Product * Total Distance * Percent operation in California

Abbreviations:

g - grams

lb - pounds

NO_X - oxides of nitrogen

PM - particulate matter

ROG - reactive organic compounds

APPENDIX H
COMMUNITY FEEDBACK

Appendix H.1. Community Input and Questions During Community Steering Committee Meetings

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
A	1	How is pollution contributing to Autism/other health conditions and what are some ways to study or measure and evaluate?	This question should be directed to a state or local health department.	No	NA
A	2	What criteria/pollutants are non-attainment and a primary concern for improvement?	Imperial County is currently nonattainment for the 24-hour PM10 standard of 150 ug/m3, the annual PM2.5 standard of 12 ug/m3, and the 8-hour ozone standard of 75 ppb. Ambient PM10, PM2.5, and ozone concentrations in Imperial County are of critical concern since these pollutants may impact the health of area residents. High PM10 levels typically occur in Imperial County due to dust emissions from both natural and man-made sources. PM10 levels may increase substantially during high wind events common throughout the year. Increased control on dust sources, including the desert areas in the western portion of the County, could significantly reduce PM10 emissions. For PM2.5, the monitor located in Calexico often records the highest concentrations in the County, due in large part to the impact of cross-border sources in Mexicali, which is located less than 1 mile from the Calexico monitoring station. Sources in Mexicali such as dirty vehicles, the long wait times at the Ports-of-Entry, uncontrolled and/or unregulated burning of agricultural debris or refuse, industrial emissions, feedlots, unpaved roads, and windblown dust all add to emissions generated within Imperial County, and contribute to the PM2.5 and PM10 levels that are present in the bi-national air shed shared by California and Mexico.	Yes	CERP Sections 1.3 and 3.1 CAMP Section 3.2.1
A	3	The US- EPA funded a PM10 source apportionment study of the Imperial Valley/Mexicali Valley to characterize cross border transport of PM10 as well as identify areas and point sources of particulate matter. The study was conducted by Desert Research, I mistrust in the early 90's. The report was authored by Drs. Judy Chow and John Watson. Findings from this study may prove useful to the monitoring goals of the Steering Committee.	The study referred to, "Imperial Valley/Mexicali Cross Border PM10 Transport Study" was published in 1997 (https://www.dri.edu/images/stories/editors/eafeditor/ChowandWatson1997ImperialValley PM10.pdf). A more recent technical analysis was performed for the ICAPCD 2018 SIP for the Annual PM2.5 NAAQS. The analysis was conducted as part of the Clean Air Act Part D Subpart 179(b) Technical Demonstration, which showed that the implementation plan would be adequate to attain and maintain the NAAQS but for transport of emissions from Mexico. Specifically, the technical demonstration included an evaluation of the impact of Mexicali emissions on the Calexico PM2.5 monitor through an evaluation of monitoring data, meteorological conditions, and emissions in the border region. Additionally, CARB staff analyzed speciated particulate matter data and conducted a source attribution analysis using Positive Matrix Factorization (PMF). Ultimately, the evaluation concluded that 15 percent of the PM2.5 in Calexico was contributed by sources that are not found in Imperial County (i.e., refuse burning and certain industrial sources), and that most of the PM2.5 from mobile and secondary nitrate sources originated from the United States-Mexico border crossing area.	Yes	CERP Section 3.2.3
A	4	Is there any transportation data (Cal Trans) that can be provided for SR86 & SR11? I don't see my proposed monitors in SR-111 area.	With regards to transportation data, this request should be directed to the California Department of Transportation.	No	NA
A	5	Why is Calexico not monitored like other cities?	The Calexico station monitors for ozone, nitrogen dioxide, carbon monoxide, sulfur dioxide, PM10, PM2.5, PM2.5 speciated, toxics, and hexavalent chromium. Compared to other sites within the Imperial Basin such as El Centro, Brawley, etc., Calexico measures much higher levels of PM2.5 and its location near the international border provides the opportunity to investigate pollution transport from Mexico to the US. These are expensive monitoring efforts and in every area of CA, the site with the highest concentrations is outfitted with the most equipment. The idea is that concentrations at other sites will be much lower, unless there is a unique pollution source, in which case you could pursue source monitoring. Monitoring at Calexico differs from other cities in other air districts due to differing regional sources.	Yes	CERP Section 3.2.1 CAMP Section 3.4.1

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
A	6	Can you include levels of toxic pollutants that are considered dangerous or non-attainment in future presentations?	Unlike criteria pollutants, toxic air contaminants don't have an ambient air concentration threshold below which air quality can be considered "acceptable" or "attainment." Instead, population-wide health risks are estimated through health risk assessments (HRAs) that require a detailed analysis of the pollutant dispersion into the environment and the potential for human exposure. In the absence of HRA data, the toxicity and amount of the pollutants emitted by a source can be used to assess the potential for health impacts; however, the actual health risks will be determined by the amount of exposure at an individual or population-wide level. CARB staff has developed toxicity-weighted emissions (pounds of emissions multiplied by a toxicity factor determined by the Office of Environmental Health Hazard Assessment) and those estimates have been included in the CERP.	Yes	CERP Section 3.2.2 provides the toxicity weighted emissions
A	7	Does the IVAN network sample on the same 6 day schedule as CARB/ICAPCD equipment?	The ICAPCD's Calexico speciation air sampling system (SASS) for PM samples on the one in 6 day schedule and the data takes some time to report (possibly 2 months) due to filter analysis and data processing. ICAPCD has PM10 and PM2.5 monitors at both El Centro and Calexico, they include: The Federal Equivalency Method BAM 1020s that sample for PM10 and PM2.5 and continuously collect and report data every hour to imperialvalleyair.org, AQMIS2 and Airnow, reviewed and validated data takes approximately 2 months to report to AQS. The FRM PM2.5 Partisol 2025s are filter-based (so these are manual) but they sample either every third day (El Centro) or daily (Calexico) and due to filter analysis and data processing it takes some time (possibly 2 months) before the data is uploaded onto EPA's AQS. The IVAN network's Dylos sensors sample every minute, aggregate/record every 5 minutes, and report every 5 minutes. Low cost sensors are a great tool to identify hotspots and provide real-time hyper-local data that can help guide personal activity to reduce exposure, but the data can't be used for regulatory or enforcement actions. FRM/FEM data on the other hand, undergoes a strict QA/QC process.	Yes	CAMP Sections 8.2 and 8.3
A	8	Will any IVAN monitors be co-located with ICAPCD/CARB particulate monitor?	CCV is open to collocation with regulatory monitors at government sites. Currently, CCV has IVAN monitors located at the regulatory monitoring sites in Calexico and Brawley. In addition, as noted in the CAMP, an AB 617 Community Monitor was installed at the El Centro regulatory monitoring site in June 2019.	Yes	CAMP Section 9.3
A	9	Dylos have been ineffective therefore how would you guarantee they will be the best choice for our communities, the misuse of public funds should be avoided.	The use of Dylos sensors has been selected in order to leverage the already established infrastructure of the IVAN monitoring network. Dylos sensors are a tool that has been validated by the Imperial Project that established the IVAN network and has been tested by South Coast AQSPEC, a regulatory agency that tests new sensors. The reasoning behind the choice of Dylos DC1700 monitors, as well as their limitations are addressed in the CAMP.	Yes	CAMP Section 8.3
A	10	Currently, 40 monitors already exist for the past years and pollution hasn't decreased.	Monitoring helps inform the community and can support new initiatives that bring resources to reduce emissions.	Yes	CAMP Sections 3.1 and 4.3
A	11	Are the Blue Dylos the same as the ones as CCV? Or do they have an upgrade?	The model that CCV employs in the IVAN network is the Dylos DC1700 with custom firmware by the Dylos corporation.	Yes	CAMP Sections 7.3 and 8.3
A	12	How were the proposed sites chosen?	Proposed sites were chosen based on recommendations from the community.	Yes	CAMP Sections 9.1, 9.2, and 9.3
A	13	Is there a justified reason for the proposed suggestion?	Observations from the sites proposed; i.e., Idling freight traffic, traffic congestion, and observed lax regulation of emissions in Mexicali/Mexico (border).	Yes	CAMP Sections 3.4, 3.5, and 9.3

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
A	14	How has pesticide use changed over the past couple years?	Use trends vary from year to year depending upon weather conditions, pest populations, and commodities markets (this affects which crops are planted and when). It is hard to generalize or predict these trends; however, use trends are summarized by the California Department of Pesticide Regulations. A few of those reports can be found here: https://www.cdpr.ca.gov/docs/pur/purmain.htm. Further, pesticide regulations in California are prone to regular changes and these tend to have significant changes on pesticide use. Generally, regulations are intended to mitigate some risk or hazard associated with various pesticide uses; so you could generalize that with each regulatory change, there is a corresponding effect toward increased safety. One recent example is regarding chlorpyrifos. It became a restricted material in 2015 and we observed a dramatic decrease in local use. Then in 2019, new conditions of use were adopted that are much more restrictive and use has dramatically changed once again. Thus far in 2019, there have been no uses of chlorpyrifos in Imperial County. While pesticide use was discussed during the Community Steering Committee meeting, it was felt that it was not necessary to provide further review within the CERP. However, exposure burden from pesticide use was presented in CERP Section 3.2.1.1, and Figures 3.10 & 3.11.	Yes	CERP Section 3.2.1.1 and Figures 3.10 & 3.11
A	15	What does pesticide monitoring cost?	It depends on the scope of the monitoring study. For a typical intensive seasonal air monitoring study, like the one conducted by CARB in Imperial County in which they looked at 5 communities (1 site per community) for 7 organophosphates 4 times per week for 10 weeks, it can be $75,000-100,000 per study. Cost for a Pesticide Air Monitoring Network sampling site, which includes collection of 1 sample per week analyzed for the presence of 31 pesticides on a year-round basis, is around $150,000 per year. The CAMP addresses the option for enhanced monitoring through a mobile platform, which could incorporate pesticide monitoring should the Steering Committee choose that. However, because enhanced monitoring has not been fully developed in the CAMP, costs for pesticide monitoring are not included.	No	NA
A	16	Is there other monitoring that DPR has conducted in Imperial County in the last 5 years? Is that data available?	Yes, in 2014, a pesticide application site monitoring study for chlorpyrifos was conducted in Imperial County. The completed monitoring report is available at: https://www.cdpr.ca.gov/docs/emon/airinit/air_monitoring_reports/2017_report_monitoring_chlorpyrifos.pdf While the above study is not an ambient air monitoring study, it is the only other pesticide study conducted in Imperial County within the last 5 years. For clarification, please see below for the difference between an application-site and a seasonal ambient monitoring study: Application site monitoring involves monitoring air concentrations next to applications of a specific pesticide for several days to estimate acute exposures. While for seasonal ambient monitoring, air samples are collected for several weeks in communities near high use regions and during high use periods to estimate seasonal exposures to a single pesticide Because the 2014 pesticide application site monitoring study was not an ambient air monitoring study, the results were not included in the CAMP or CERP. However, the pollution burden exposure indicator and emission inventory data included in Chapter 3 of the CERP does address pesticides.	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
A	17	How has pesticide use changed over the past couple years?	Pesticide use can vary greatly depending on the pesticide, crop, and region of interest. Therefore, without knowing what pesticide is being inquired about, it is difficult to address this question. California has one of the most robust pesticide reporting frameworks in the world, and as such, it can be accessed to determine use patterns for all pesticides usage in California. Specifically, in 1990, DPR established a comprehensive program for reporting agricultural use of pesticides. Under the program, pesticide applications to agricultural sites must be reported monthly to county agricultural commissioners, who in turn, report that information to DPR. Detailed reports are required for applications used to produce agricultural commodities, such as applications to grape vineyards and cotton fields. Specifically: • The pesticide use reports for production agricultural use include information for each individual application, including the product applied, the amount applied, crop/site treated, date applied, and location (within a 1 x 1 mile area). • Summary pesticide use reports are required for non-production agricultural and some non-agricultural uses. • Non-production agricultural uses include applications to approximately 20 sites, such as golf courses, cemeteries, and roadsides. Non-agricultural uses that must be reported include applications by structural pest control businesses and applications for vector control. • Some industrial (e.g., fumigations of harvested commodities), institutional (e.g., schools), and veterinarian uses must be reported. • Pesticide use reports for non-production agricultural and non-agricultural uses include the product applied, monthly total amount applied, month applied, and county of application. • Uses by homeowners and consumers require no reporting. DPR's Pesticide Use Database can be accessed at following site: https://www.cdpr.ca.gov/docs/pur/purmain.htm A review of pesticide use was considered beyond the scope of the CERP and was therefore not addressed in the plan.	No	NA
A	18	We would like clarity on outreach to set hospital/impact perspective	The ICAPCD is working to establish a working relationship with the Imperial County Public Health Department and El Centro Regional Medical Center to provide more outreach and education to the community.	No	NA
A	19	What is the cost of a community monitor and maintenance?	The APCD will contract CCV to conduct the AB617 Community Monitoring as CCV has an existing community monitoring network and has the experience to maintain it. The anticipated costs associated with the first two years of Community Monitoring is documented in the CAMP.	Yes	CAMP Section 8.3
A	20	Will there be a budget breakdown of the funds for outreach and education? Who is responsible for outreach and education?	Yes, a budget break down for the AB617 Monitoring Plan will be proposed and will need the approval of the AB617 Steering Committee and it includes outreach and education. The ICAPCD and CCV are responsible for outreach and education. While the budget is still pending, details on outreach and education have been included in the CERP.	Yes	CERP Sections 4.4.4, 5.3.1
A	21	Is APCD open to proposal for AB 617 projects?	Yes, the next phase of AB617 is an Emission Reduction Program where the AB 617 Steering Committee will propose projects in the corridor.	Yes	CERP Section 4.4

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
A	22	Regarding monitors – can we get others and mix it up?	Monitoring proposed for AB 617 will consist of various types of technology. CCV will bring its expertise in Particulate Matter (PM) community monitoring. The CAMP also addresses the option for enhanced monitoring through a mobile platform, which could incorporate a variety of monitors should the Steering Committee choose that.	Yes	CAMP Sections 3.5 and 5.2
A	23	Is it possible to consider Dylos and Clarity monitors?	CCV brings its full knowledge of community monitoring for PM with the Dylos sensors. While CCV does not hold the IVAN network to a single technology, they are in fact incorporating methane sensors to their monitors, they do not have experience with the "sensing-as-a-service" of Clarity monitors. The reasoning behind the choice of Dylos DC1700 monitors is addressed in the CAMP.	Yes	CAMP Section 8.3
A	24	What is the life expectancy of the Dylos? Does this include retrofit?	The model of Dylos DC1700 that CCV employs in the IVAN monitors are rated for a 18-24-month lifespan when deployed in the field. CCV has observed varied lifespans with the sensors in the IVAN monitors. Also, CCV does remove some sensors before the set lifespan for recalibration.	Yes	CAMP Section 8.3
A	25	Can you provide information on the accuracy of Dylos 1700? SCAQMD reports R2=.15 – 18 for PM10?	Accuracy for the Dylos DC1700 with custom software employed in the IVAN network is reported as PM2.5 0.79 (hourly), 0.84 (daily); PM10 0.78 (hourly), 0.81 (daily) as conducted in the study *Development and Field Validation of a Community-Engaged Particulate Matter Air Quality Monitoring Network in Imperial, CA* .	Yes	CAMP Section 7.3
A	26	Why can't we use multiple monitors that will have multiple sources of data?	The CAMP addresses the option for enhanced monitoring through a mobile platform, which could incorporate a variety of monitors should the Steering Committee choose that.	Yes	CAMP Sections 3.5 4.3, and 5.2
A	27	What about New River emissions such as toxic matter, black carbon, nitrous oxides, and VOCs?	The Steering Committee has presented this site as one of high concern. In respect to community monitoring, CCV proposes to deploy a PM monitor as close as possible to this site with support for other monitors later on by the ICAPCD and CARB after adoption of the CAMP. The CAMP addresses the option for enhanced complimentary monitoring through a mobile platform, which could be used to monitor the New River, if that location is chosen by the Steering Committee.	Yes	CAMP Sections 5.2 and 9.3
A	28	Cesar Chavez Blvd will need monitoring due to border crossing. What are your plans?	The Steering Committee has presented this site as one of high concern. In respect to community monitoring, CCV proposes to deploy a PM monitor as close as possible to the site with support for other monitors later on by the ICAPCD and CARB after adoption of the CAMP. The CAMP addresses the option for enhanced complimentary monitoring through a mobile platform, which could be used to monitor this location, if it is chosen by the Steering Committee.	Yes	CAMP Sections 5.2 and 9.3
A	29	How are we going to combine the data since CCV currently does not have mobile units?	CCV will be providing the data collected by its community monitors to CARB for publishing to the AQ View platform. Any additional data collected under the AB 617 program will also be published to the same platform.	Yes	CAMP Section 11.3
A	30	What will be the related cost for the encasing boxes for the Dylos 1700?	The company that supplies the weatherproof enclosures discounts the price with higher quantities ordered. The cost for the proposed 15 monitors is $273 per unit as of writing. The cost for installation, maintenance, and operation of the AB 617 Community Monitors for the first two years of implementation is presented in the CAMP (Section 8.3). Only the overall cost for operation of the monitors is included. Cost of encasing boxes is presumed to be included in the total cost.	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
B	31	Area of Concern: Dust from construction sites	ICAPCD will implement enhanced enforcement measures, including increased community outreach through workshops, trainings, publications, and the formation of a dedicated outreach team. CARB has also committed to deliver one training session during the first year of plan implementation. These measures don't directly address construction dust emissions, however emission reductions can be expected with continuing community outreach.	Yes	CERP Sections 5.3.1
B	32	Area of Concern: Truck and bus idling in specific areas, including the east port of entry.	ICAPCD is proposing three Transportation Strategies for emission reductions as follows: • T-1 - Border Activity Strategies - Under this strategy, ICAPCD proposes to work with local transportation agencies and other bodies to assess the feasibility of implementing measures that reduce the impact of activities at the border. • T-2 - Signage to Reduce Idling - Under this strategy, ICAPCD proposes to solicit input from local school districts, senior facilities, and medical centers to determine if installing signage that encourages vehicles not to idle near these sensitive receptor land uses would be found as beneficial. • T-3 - Truck Idling Education and Outreach - Under this strategy, ICAPCD proposes to partner with CARB to conduct education and outreach to reduce the amount of truck idling in the Corridor through workshops, training, and quarterly newsletter publication.	Yes	CERP Sections 4.4.7 and 5.3.1
B	33	Suggestion to increase inspection rate on trucks coming from Mexico.	CARB is committed to enhancing enforcement activities within the El Centro-Heber-Calexico Corridor, which will include targeting areas that may require additional enforcement with guidance from the Steering Committee. CARB intends to increase the frequency of compliance inspections.	Yes	CERP Section 5.3.1
B	34	Area of Concern: Gap of information on mobile source inspections	CARB has committed to multiple enforcement measures presented in the CERP. These include an increase in the frequency of CARB compliance inspections with guidance from the Steering Committee. CARB will collaborate with the Steering Committee co-chairs to work with the Steering Committee members to actively enhance CARB enforcement activities through a combination of improved complaint reporting, more focused inspections, and report-back meetings to update the Steering Committee on the status of CARB inspections and to obtain additional areas of mobile source concern.	Yes	CERP Section 5.3.1.2
B	35	Area of Concern: Vacant lots used for parking trucks and potential idling	ICAPCD will implement enhanced enforcement measures, including increased community outreach through workshops, trainings, publications, and the formation of a dedicated outreach team. These measures don't directly address vacant lot dust emissions and idling, however emission reductions can be expected with continuing community outreach. Additionally, ICAPCD is proposing two Transportation Strategies for emission reductions from idling as follows: • T-2 - Signage to Reduce Idling - Under this strategy, ICAPCD proposes to solicit input from local school districts, senior facilities, and medical centers to determine if installing signage that encourages vehicles not to idle near these sensitive receptor land uses would be found as beneficial • T-3 - Truck Idling Education and Outreach - Under this strategy, ICAPCD proposes to partner with CARB to conduct education and outreach to reduce the amount of truck idling in the Corridor through workshops, training, and quarterly newsletter publication.	Yes	CERP Sections 4.4.7 and 5.3.1

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
B	36	Area of Concern: Traffic on highways increases during peak hours. Suggested improvements for highway routes and reductions of carbon dioxide emissions	The community identified routes for heavy-duty truck traffic in the corridor. Their concerns focus on transit through residential areas and school proximities. Community members did not identify Highway 8 as a high priority route. However, CARB will continue to conduct inspections in the area. Highway 8 runs east to west across Imperial County, specifically through the El Centro and Holtville communities. In addition, Strategy T-1 in the CERP offers the possibility of evaluating alternative routes of traffic coming through the ports-of-entry.	Yes	CERP Section 4.4.7
B	37	Suggestion - Include Automated License Plate Readers (ALPR) and Portable Emission Acquisition System	CARB will incorporate new technologies, where feasible, to assist and enhance enforcement work in communities	Yes	CERP Section 5.3.1.2
B	38	Make the CARB Enforcement Visualization Tool available in Spanish and promote its use.	CARB staff will work on making the visualization tool available in Spanish by the first quarter of 2020. The visualization tool is addressed in Section 5.3.1 of the CERP, which includes a link to the visualization tool. The CERP does not directly address the pending availability of a visualization tool in Spanish because that level of detail was not considered necessary in the CERP.	No	NA
B	39	Suggestion to consider pollutant transport from Mexicali to US in the Corridor.	The topic of international pollutant transport is well-studied in the region. The CERP (Section 3.2.3) contains a summary of a technical analysis performed for the ICAPCD 2018 SIP for the Annual PM2.5 NAAQS. The analysis was conducted as part of the Clean Air Act Part D Subpart 179(b) Technical Demonstration, which showed that the implementation plan would be adequate to attain and maintain the NAAQS but for transport of emissions from Mexico. In addition, international contributions to pollutant concentrations will be considered when the regulatory monitoring data is evaluated, as discussed in the CAMP (Section 14.2).	Yes	CERP Section 3.2.3 and CAMP Section 14.2
B	40	Consider vicinity with Mexicali in resolutions to improve air quality in the area. Sources near border: Sukarne feedlot and La Rosita power plant. Suggestion is to coordinate efforts with Mexicali through the Imperial Valley-Mexicali Air Quality Task Force	The District and CARB have been working with United States and Mexican agencies to develop the Imperial County-Mexicali Air Quality Work Plan. This collaborative effort between governments on both sides of the border provides a plan for prioritizing actions that should be taken to improve air quality in the border region. Priorities of the plan include education and outreach, improved air monitoring, and strategies to reduce emissions from sources such as agricultural burning, vehicles at the border, and unpaved roads. The results of this plan may include new regulatory action taken by agencies, including CARB and ICAPCD. The plan's working draft will be reviewed on a regular basis to determine if and when new rules or regulations in Imperial County result from it.	Yes	CERP Section 4.4.1
B	41	Include border patrol agency in the discussion to reduce emissions from vehicles crossing the border	This item will be communicated to the appropriate agency.	No	NA
B	42	Reported idling trucks in Westmorland, Chevron station on West Main Street and South F Street	CARB will increase enforcement presence in the reported areas of Westmorland and Brawley.	Yes	CERP Section 5.3.1
B	43	Reported idling trucks in Brawley on Main Street in between Highway 111 and S 8th Street	CARB will increase enforcement presence in the reported areas of Westmorland and Brawley.	Yes	CERP Section 5.3.1
B	44	Request to inspect Spreckels Sugar Co Inc., located at West Keystone Road in Brawley. Seasonal activity occurs April through the end of July	This item will be communicated to the appropriate agency.	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
B	45	Suggestion to construct a cooling station for truckers by the East port of entry to reduce idling with air conditioning on during the summer season when temperatures can reach up to or above 100°F	This item will be communicated to the appropriate agency.	No	NA
C	46	The Steering Committee and public attendees ranked the level of priority for installation of indoor air filtration systems at local elementary, middle, and high schools, as well as adult education centers. Survey results are presented in Appendix G.2	The CERP addresses installation of air filtration systems at sensitive receptors in sections 4.3 and 4.4.8, where ICAPCD proposes to install air filtration to cover 240,000 square feet of building space. However, no formal prioritization list has been established at this time. Identification and prioritization of individual projects will be a topic of discussion at future Steering Committee meetings.	No	NA
D	47	The Steering Committee and public attendees rated the level of favorability and amount of funding for the following mitigation strategies: • Expansion of the School Flag Program • Green-space projects • School bus replacement projects • Establishment of other air quality notification programs and education/outreach programs • Paving of unpaved parking lot projects • Indoor Air Filtration projects at schools/sensitive receptor locations	The CERP addresses mitigation strategies in CERP Section 4.4.8. However, no formal prioritization list has been established. Identification and prioritization of individual projects will be a topic of discussion at future Steering Committee meetings.	No	NA
E	48	One concern that the community has been discussing for a long time is dust and smoke in the air right after harvest season is done, as well as haze from the feeding lots. These should be addressed.	ICAPCD recognizes that dust and smoke have a significant exposure impact on the Community. As a result, both of these pollutants have been identified and addressed in the CAMP and the CERP. In particular, there are several strategies proposed in the CERP that would specifically address emissions of dust and smoke (i.e., M-3 - *Parking Lot Paving Projects* ; M-5 - *Strategic Updates to Policy 34*) and reduce exposure (i.e., M-1 - *Air Filtration Systems* ; M-4 - *Expanded/Improved School Flag Program*).	Yes	CAMP Section 3.3 and 4.4 CERP Sections 3.1, 3.2, and 4.4
E	49	Is there something that can be done to prevent or lower the impact of emissions from Mexicali?	While ICAPCD does not have the authority to control emission sources in Mexicali, it is currently working with CARB and other United States and Mexican agencies to develop the Imperial County-Mexicali Air Quality Work Plan. This collaborative effort between governments on both sides of the border provides a plan for prioritizing actions that should be taken to improve air quality in the border region. This Work Plan is being developed separate from the CERP.	No	NA
E	50	Imperial County has for many years had serious problems with zoning and planning. The important role that zoning and planning plays in air quality should not be forgotten.	ICAPCD recognizes that zoning and planning plays a crucial role in addressing exposure to air pollutants. As a result, ICAPCD has proposed Strategy L-2, *General Plan Comment and Review* , whereby the Steering Committee and the District are proposing to track and review local general plan updates and issue a joint comment letter when a local action has the potential to affect air quality or exposure in the Corridor.	Yes	CERP Section 4.4.6
E	51	CSC members had many questions and comments surrounding updates to Policy #34, Agricultural Burning, and the timeline for implementation of the updates.	Agricultural burning is a common practice in Imperial County and can contribute to the exposure burden in the Corridor under certain meteorological conditions. As a result, ICAPCD is proposing to update Policy 34, Agricultural Burning Procedures for Allocating Acreage, Burn Day Decisions, and Tracking (Strategy M-5 - *Strategic Updates to Policy 34*). The CERP specifies the exact amendments that will be made to Policy 34; however, the timeline for adoption of the updated policy is yet to be determined.	Yes	CERP Section 4.4.8

Appendix H.1. Community Input and Questions During Community Steering Committee Meetings

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
E	52	An interest in planting of trees was expressed by CSC members and the public at multiple meetings.	ICAPCD understands the wide Community interest in planting trees for improvement of air quality. As a result, the District is proposing the following three strategies in the CERP related to this topic: Strategy I-2, *Urban Greening Incentive Programs,* would require the District to monitor for and identify potential grant programs for urban greening projects. Strategy L-3, *Urban Greening Project Identification* , would result in an area-wide plan identifying potential locations where urban greening projects could be implemented to mitigate air quality impacts on sensitive receptors. Strategy M-2, *Urban Greening Projects* , has an initial allocation of funds dedicated to implementation of urban greening projects within the Corridor.	Yes	CERP Sections 4.4.5, 4.4.6, and 4.4.8
E	53	CSC members expressed interest in low cost monitors for monitoring of additional pollutants such as NOx, VOC, and hydrogen sulfide.	The CAMP addresses the option for enhanced monitoring through a mobile platform, which could incorporate a variety of monitors should the Steering Committee choose that. Currently the plan does not incorporate low cost monitors to measure pollutants other than particulate matter.	No	NA
E	54	CSC members had many questions and comments regarding mobile monitoring stations. Specifically, they requested clarification of what pollutants will be monitored and discussed partnering with another organizational group. They wanted to know how locations for monitoring would be chosen, and asked if postponing adding mobile monitoring to the CAMP will affect funding for it?	The CAMP addresses the option for enhanced monitoring through a mobile platform, which could incorporate a variety of monitors should the Steering Committee choose that. However, because mobile monitoring has not yet been fully developed, the detailed questions regarding types of pollutants to be monitored, location decisions, and funding have not been addressed in the current version of the CAMP.	No	NA
E	55	Regarding the school air filtration project: In the commenter's experience you cannot filter all gases from schools. Gases get recycled from outside back into the classroom. Has anyone thought about that problem?	The purpose of the school air filtration project is to filter particulate matter, not gases. Gas filtration is considered beyond the scope of the current CERP	No	NA
E	56	Would the plan identify hot spots as identified by the CSC? Would hot spots be prioritized for Tier 1 and Tier 2 strategies?	The CSC will have the opportunity to participate in Paving Project Identification (Strategy L-1) and Urban Greening Project Identification (Strategy L-3). The identification of areas for each of the above projects can include an assessment of hot spots.	Yes	CERP Section 4.4.6
E	57	How will the CSC participate in policy and rule development?	Consistent with the process used for the strategic updates to ICAPCD Policy 34 (Strategy M-5), the CSC will continue to be solicited for their input on key policy, rule, and SIP actions. However, CSC participation in these matters is not directly addressed in the CERP.	No	NA
E	58	Will there be an opportunity to discuss other rules such as fugitive dust, emission reduction credits, or mobile sources?	Per the Steering Committee Charter, Steering Committee meetings will continue to be held throughout the implementation of the CERP for so long as the Steering Committee finds them useful and necessary. For those meetings, Steering Committee members can propose whatever agenda topics they like, including a discussion of existing District rules.	No	NA
E	59	It is very important to look at policies regarding how schools are sited. There is no excuse for schools being surrounded by farmers fields or at the edge of communities where young people are exposed to pollution. This should be addressed at the government and planning stages	CERP Strategy L-2, General Plan Comment and Review, addresses participation in general plan revisions and updates. Under this strategy, the District is proposing to collaborate with the CSC to track and review local general plan updates and issue a joint comment letter when a local action has potential to affect air quality exposure in the Corridor.	Yes	CERP Section 4.4.6

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	60	Chapter 3 – Understanding the Community • In this chapter, can we have a figure that breaks down the key stationary sources in the Calexico, Heber, El Centro, by regulatory program (county, California, federal)?	Permitted stationary sources in the Corridor can generally be separated into two groups: major stationary sources and non-major stationary sources. Major stationary sources are subject to Imperial County Air Pollution Control District (ICAPCD or "District") Title V air permitting requirements with oversight by the United States Environmental Protection Agency (USEPA), whereas non-major stationary sources fall under the purview of the ICAPCD. Figure 3.9 (formerly Figure 3.12 in the 9/6/2019 draft) has been updated to identify the Title V facilities within or directly adjacent to the Corridor.	Yes	CERP Figure 3.9
F	61	Chapter 3 – Understanding the Community • What is the land use profiles of Calexico, Heber, El Centro? (residential, commercial and industry etc.)	Calexico, Heber, and El Centro are each a unique mixture of residential, public/municipal, commercial, and industrial land uses. In Calexico and El Centro, there are certain portions of the city where commercial and industrial land uses are more densely situated (e.g., eastern El Centro and southwest and northwest Calexico). Each of these municipalities is then surrounded by agricultural land uses. A land use map of the Corridor was provided in the Response to Comments document.	No	NA
F	62	Section 3.2.1.1 Evaluation of Existing Data • Community Monitoring Data: Figures 3.7 & 3.9 images needs to be clearer and needs to have a text explaining the important/significant of these figures.	While there were substantial improvements made in the quality of the data in Figures 3.7-3.9 from the August 26, 2019 draft to the September 6, 2019 draft, we agree that these figures remain difficult to read. We also recognize that these figures represent a subset of the historic community monitoring data in the Corridor and thus may present an incomplete picture. To date, historic community monitoring data from the Corridor has not been analyzed as part of the AB 617 process. For these reasons, Figures 3.7-3.9 have been removed from the CERP.	Yes	NA
F	63	Section 3.2.1.1 Evaluation of Existing Data • Air Pollution Burden: Using CalEnviroscreen 3.0 is great tool that use census data to capture statewide trends in pollution burns (ex. location of disadvantaged communities), but I questioned that it reflects residents' experiences with pollution, especially in the city of Calexico. For example, in my experience the westside of Calexico would be impacted heavily from agriculture burning and land management practices (ex. dirt lots) then the eastside these figures only show 6 air quality indicators.	As indicated in the draft CERP, Figures 3.10 and 3.11 present the statewide and countywide burden percentiles, respectively, for the five air quality-related CalEnvironScreen 3.0 (CES3) indicators (plus the average of these five) for census tracts in Imperial County. At present, CES3 data is only available down to the census tract level and higher resolution data is unavailable. The CSC can and should play a role in ground-truthing this and other data in the Technical Foundation (Section 3.2) and sharing their personal insights to help guide strategy implementation. The remaining CES3 indicators were not included in the figures as they aren't directly relevant to the strategies and goals in the CERP; however, that information can be obtained through the CES3 tool at: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30.	No	NA
F	64	Section 3.2.2 Community-Level Emission Inventory • I understand that the Community-level Emission Inventory was created by CARB using the "best available data", which is based on inventory data/emission modeling. This means that no air quality monitoring or meteorological data was actually used to measure these baseline emissions calculations. As a concerned resident I think this report is depending too heavily on community level emission inventory data to establish baseline understanding of the air pollution challenges in the community, which from my perspective is limiting and might not be capture the extent of CAP and TAC affect this community.	The Community Air Protection Blueprint requires community-level emissions inventories to be a key component of a community's CERP and explains its reasoning as follows, "[d]eveloping more granular community-scale emissions inventories is critical for understanding existing baseline emissions and tracking future emission reductions within a community." As indicated in the draft CERP, the community-level emissions inventory was developed by the California Air Resources Board (CARB) using best available data, following CARB methodologies for emissions estimation. One way the inventory can be used is to identify which source types may be contributing to criteria and toxic air pollutant emissions within the community. The inventory, along with CSC input, can also be used to determine which areas could benefit from additional and more diverse air quality monitoring.	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	65	Section 3.2.2 Community-Level Emission Inventory • Is it possible for the APCD to update the El Centro monitoring station to be able to use other source attribution technical approaches, such as Chemical Mass Balance and Positive Matrix Factorization (PMF) to compliment the Community-Level Emission Inventory? For example, the CERP has a little more information about the city of Calexico (PMF identified seven major sources of PM2.5 in Calexico: airborne soil (24%), biomass burning (19%), mobile (16%), secondary sulfate (15%), secondary nitrate (11%), refuse burning (11%), and industrial sources (4%)," because of the type of monitoring that city has which allows for the Positive Matrix Factorization.	At present, the El Centro monitoring station is not configured with monitoring equipment necessary for source attribution analyses like chemical mass balance and positive matrix factorization; however, the Community Air Monitoring Plan (CAMP), the companion document to the CERP, identifies the CSC's interest in complementary monitoring options. Expanded monitoring and source attribution analyses are potential future options for the CSC to explore under the CAMP.	Yes	CAMP Section 5.2
F	66	Section 3.2.2.1 Stationary Sources • It is stated in this section that "If activity data was not available, emissions for those stationary sources remained as stationary aggregate sources and were distributed evenly using spatial surrogates." Why wouldn't certain area source not be available?	The area source emissions inventory category includes a broad and diverse set of sources for which it would be nearly impossible to collect accurate activity data on a routine basis. For this reason, alternative approaches and surrogate data are used when necessary.	No	NA
F	67	Section 3.2.2.2 Area-wide sources • Why in Table 3.6 is the calculation for Solvent Evaporations, such as pesticides/fertilizers, consumer products for NOx 0.00?	Solvents are typically made up of volatile organic compounds (VOCs); therefore, one would expect the emissions from these sources to be dominated by organic gases (i.e., TOG and ROG) and not particulate matter or combustion byproducts (i.e., CO, NOx, SOx). The specific CARB methodologies that were used for these calculations can be found at: • Pesticides/fertilizers: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full6-4.pdf • Asphalt paving: https://ww3.arb.ca.gov/ei/areasrc/districtmeth/imperial/impasphpav.pdf • Architectural coatings: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full6-3.pdf • Consumer products: https://ww3.arb.ca.gov/ei/areasrc/onehtm/one6-1.htm	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	68	Section 3.2.2.2 Area-wide sources • In table 3.6 Miscellaneous Processes makes up 1892.44 PM10, and the majority of that comes from fugitive dust 1274.04. This seems pretty significant. Could APCD consider including in the CERP an amendment of the Rule 804 as a "emission reduction exposure reduction strategy." This was something that was mentioned in the IC 2018 PM2.5 Plan "The District proposes to amend Rule 804, Open Areas, to include a provision that would expand the rule's applicability criteria if contingency conditions are triggered under this Plan. Rule 804 regulates fugitive dust emissions by requiring landowners of open areas to implement BACM or Alternative BACM on plots exceeding 3.0 acres for rural areas or 0.5 acres for urban areas and containing at least 1,000 square feet of disturbed surface area. Since areas subject to Rule 804 are presumably already controlled to BACM levels, one way to effect further reductions is by expanding the applicability criteria. Under this contingency measure, the District would expand Rule 804 applicability to include all rural open areas containing at least 1,000 square feet of disturbed surface area."	As mentioned in the Imperial County 2018 PM2.5 State Implementation Plan (SIP), Rule 804 has been recognized by the USEPA as meeting best available control measure (BACM) requirements for PM10. BACM is generally the highest level of control that can be obtained from area sources of air pollution, considering such factors as economic and technologic feasibility. Achieving additional reductions through Rule 804 would be difficult without causing unreasonable economic burdens on the entities controlled. For this reason, the draft CERP focuses on other means of reducing fugitive dust emissions in the Corridor (i.e., through improved enforcement [Strategies E-1 through E-10] and mitigation [Strategy M-3])	No	NA
F	69	Section 3.2.2.2 Area-wide sources • Here is a screen shot of Calexico, my neighbors is surrounded by dirt lots/undeveloped land: <<an image showing dirt lots/undeveloped land was provided in comment letter>>	Your comment is noted. There are many locations in the Corridor where vacant lots are located adjacent to sensitive receptors, like neighborhoods and schools. The CSC may want to consider whether some of these locations would be good candidates for parking lot paving projects (Strategy M-3) or urban greening projects (Strategy M-2) where vegetative barriers could be used to mitigate the impacts of fugitive dust emissions coming off of vacant land.	No	NA
F	70	Section 3.2.4.1 County Policies and Programs Incentive Programs • Maybe call this section Voluntary Emission Reduction Program.	The term "Incentive Program" is used by air districts and CARB to describe programs that use funding to support the introduction and expedited deployment of technologies beyond what is required by regulation. While this is in line with proposed alternative title, to avoid stakeholder confusion, the term "Incentive Program" has been maintained.	No	NA
F	71	Section 3.2.4.1 County Policies and Programs Carl Moyer Program • Missing the data for the 2016 year in Table 3.13.	This was a typographical error in the draft CERP. There were no Carl Moyer projects executed in 2016 in Imperial County; therefore, 2016 reductions are zero. The reference to 2016 data has been removed from the CERP.	Yes	CERP Section 3.2.4.1
F	72	Section 3.2.4.1 County Policies and Programs Carl Moyer Program • Also, what is the emission reduction impact of this program over its lifetime (1998) in Imperial County?	The historic reductions associated with implementation of the Carl Moyer Program in Imperial County from its inception have not been compiled and are not readily available at this time.	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	73	Section 3.2.4.1 County Policies and Programs Carl Moyer Program • What type of machinery is getting replaced (similar break to table 3.14)?	Per Section 3.2.4.1 of the draft CERP, "Eligible [Carl Moyer] projects include purchasing cleaner on-road trucks, school and transit buses, off-road equipment, agricultural equipment, and lawn mowers….Most recently, the program has been funding the replacement of agricultural equipment, including tractors and hay loaders at a rate of 4 to 6 pieces of equipment per year."	Yes	CERP Section 3.2.4.1
F	74	Section 3.2.4.1 County Policies and Programs Carl Moyer Program • How does the Carl Moyer Program distribute funds?	The Carl Moyer Program in Imperial County is currently administered by ICAPCD. Interested parties can seek Carl Moyer funding by first filling out the District's application (available at: https://www.co.imperial.ca.us/AirPollution/PlanningDocs/CarlMoyer/CMYR18Application.pdf). Eligible projects are funded on a first come-first serve basis, for as long as funding is available.	No	NA
F	75	Section 3.2.4.1 County Policies and Programs Carl Moyer Program • Does this program prioritize disadvantage communities?	The Carl Moyer Program currently does not prioritize projects in disadvantaged communities; however, some CARB incentive programs currently do (e.g., the Woodsmoke Reduction Program).	No	NA
F	76	Section 4.4.5.2 Potential Funding Program • Wood Stove Burning are not commonly used in Imperial County. I find it odd that the Imperial County 2018 PM2.5 Plan focuses so heavy on this emission source, compared to other emission sources. According to census 2009 date only 3% of our county used wood burning stoves (fireplaces). Here is the link to from the article I got this data from https://www.researchgate.net/publication/277437532_Agricultural_burning_monitored_for_air_pollutants_in_Imperial_County_Exposure_reduction_recommendations_developed	When a SIP is being developed, there are a variety of factors that dictate when new rules are required or existing rules need to be updated. During the development of the ICAPCD $PM_{2.5}$ SIP, CARB determined that the District was lacking reasonably available control measure (RACM)-level rules related to wood burning devices. Hence, there was a necessity to focus on this source type in the SIP. The SIP also introduced rules related to other source types including: boilers, steam generators, process heaters, composting operations, and water heaters.	No	NA
F	77	General Comments on CERP • In regards to the Community Emissions Reduction Program, where in the CERP is the incorporation of SB 1000 into the general plan as it relates to pollution exposure.	Senate Bill (SB) 1000 requires cities and counties to incorporate an environmental justice element (or related goals, policies, and objectives integrated in other elements) into their general plan(s). A description of SB 1000 and a link to the legislative text is included under the description of Strategy L-2 in Section 4.4.6 of the draft CERP.	Yes	CERP Section 4.4.6
F	78	General Comments on CERP • In addition, CERP's must include requirements for OPR to engage in the required SB 1000 implementation and update requirements of the EJ element in the cities and counties General plans.	The California Governor's Office of Planning and Research (OPR) is required to adopt and periodically revise the State General Plan Guidelines (GPG) for the preparation and content of general plans for all cities and counties in California. Those guidelines have since been updated to address the requirements of SB 1000. It is the responsibility of local planning agencies to ensure that they are following the latest GPG and adhering to the requirements of SB 1000.	No	NA

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	79	General Comments on CERP • Also include statutory requirements under government code 65302 h1a mitigation strategies for schools that are adjacent to major thoroughfares. Exposure versus mitigation exposure is the cloud of toxics outside the classroom and mitigation is the filtration systems or keeping the children indoors so there should be sufficient resources for exposure reductions. Fact, exposure to diesel PM is accelerated during the winter months adjacent a school. What are our air pollution reduction goals our exposure reduction goals?	Strategy L-2 in the draft CERP provides the CSC with a mechanism by which they can formally comment upon planning decisions that have the potential to affect air quality or exposure in the Corridor, including environmental justice related concerns.	Yes	CERP Section 4.4.6
F	80	General Comments on CERP • The final CERP must include clear quantifiable reduction targets for emission sources with the Heber-El Centro-Calexico Corridor. As well as adopt a Supplemental Environmental Project.	Section 65302(h)(1)(A) of the California State Government Code lists one of the requirements of environment justice elements of local general plans. This requirement states that the environmental justice element shall, "Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality…" While this requirement is specific to general plans, Strategy M-1 in the draft CERP specifically addresses the exposure of sensitive receptors and proposes to mitigate that exposure through air filtration systems, which are shown to be effective in reducing concentrations of diesel particulate matter (DPM).	No	NA
F	81	Section 3.2.4.1 County Policies and Programs Additional Incentive Programs: Woodsmoke Reduction Program • Are there any further details available on the Woodsmoke Reduction Program?	The Woodsmoke Reduction Program is an incentive program administered by the California Air Resources Board (CARB). Additional information on this program, including program guidelines and eligibility criteria, can be found at: https://ww3.arb.ca.gov/planning/sip/woodsmoke/reduction_program.htm.	No	NA
F	82	Section 4.4.6 Land Use Strategies • L-1 – Paving Project Identification (Tier 1): Was the list of location suggestions for paving unpaved roads ever requested from the steering committee?	To date, the CSC has not been solicited for their input on this topic; however, as indicated in the descriptions of Strategies L-1 and M-3, input from the CSC will be an important factor in determining the locations and priority of parking lot paving projects within the Corridor. Strategy L-1 establishes a deadline of July 1, 2020 by which the District would solicit input from various stakeholders, including the CSC, regarding these projects.	Yes	CERP Section 4.4.6
F	83	Section 3.2.1.1 Evaluation of Existing Data • Figures 3.7-3.9 are illegible and of poor quality	While there were substantial improvements made in the quality of the data in Figures 3.7-3.9 from the August 26, 2019 draft to the September 6, 2019 draft, we agree that these figures remain difficult to read. We also recognize that these figures represent a subset of the historic community monitoring data in the Corridor and thus may present an incomplete picture. To date, historic community monitoring data from the Corridor has not been analyzed as part of the AB 617 process. For these reasons, Figures 3.7-3.9 have been removed from the CERP.	Yes	NA
F	84	Section 3.2.5.1 Identification of Sensitive Receptors • Figure 3.22 - Dogwood Elementary School is not included in this map and this has been brought up at previous CSC meetings.	Your comment is noted. **Figure 3.22** and **Appendix E** have been updated to include Dogwood Elementary School in Heber.	Yes	CERP Figure 3.22 and Appendix E

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	85	Section 3.2.5.3 Identification of Existing and Potential land Use Issues • This section challenges the authority of the Imperial County Board of Supervisors and Planning Department. It is not appropriate to single out a one potential land use issue in this document. If the section is to remain, I would suggest the second paragraph be changed to the following: *The proximity of the sensitive land uses to industry is a result of communities expanding into areas that were occupied by industrial or agricultural use.*	CARB's Community Air Protection Blueprint requires CERPs to perform an assessment of sensitive receptor locations and how land use issues may impact exposures. This is the distinctive purpose of Section 3.2.5.3. In addition, this and the proceeding section (3.2.5.2) describe in detail land use authority in Imperial County. The first sentence to the second paragraph has been revised as follows, "The proximity of sensitive land uses to industry is often the result of communities having expanded over time into properties which are adjacent to pre-existing industrial or agricultural land uses."	Yes	CERP Section 3.2.5.2 and Section 3.2.5.3
F	86	Section 5.2.1 ICAPCD Enforcement Review • This section in the document states Emission Reduction Calculations, but it sounds like it might need to say Appendix E "Permitting and Enforcement Supporting information"? If it is referring to Appendix E?	This was an error in the August 26, 2019 draft, which was corrected in the September 6, 2019 draft.	Yes	CERP Section 5.2.1
F	87	General Comments on CERP • Use of early emission reduction projects needs to be clearly identified and strategically placed into CERP (example: identifying parking lot paving project in Calexico as well as AG burn policy).	The descriptions of Strategies M-3 and M-5 have been updated to reference the early actions that have been taken.	Yes	CERP Section 4.4.8
F	88	General Comments on CERP • CERP documents needs to recognize the term open areas when discussion is of any off road areas.	References to emissions from open areas have been added to Sections 3.2.1.2 and 4.4.8 of the CERP.	Yes	CERP Section 3.2.1.2 and Section 4.4.8
F	89	General Comments on CERP • CERP document must properly recognize but-for and wind events in a manner that clearly paints and represents Imperial County Air Quality Attainment and or non-attainment profiles.	Section 3.1 of the CERP has been edited to explain the role "but for" attainment and exceptional events play in Imperial County's current attainment/nonattainment status.	Yes	CERP Section 3.1
F	90	Section 3.2.5.3 Identification of Existing and Potential land Use Issues • Open areas also needs to be added to this section.	A reference to "open areas" has been added to this section.	Yes	CERP Section 3.2.5.3
F	91	Section 4.4 Reduction Strategies • Potential tier II project will be open areas and/or desert areas located West of the 617 corridor El Centro, Heber, and Calexico. As a precursor to this PM10 soil analyses will need to be done similar to pass works performed in around the Salton Sea as well as the Anza Borrego offroad area.	Analyses performed by the District have shown that emissions from open areas and/or desert areas on the west of the Corridor have the potential to impact residents of the Corridor. As a result, a new strategy, L-4, has been added to Section 4.4.6 of the CERP that focuses on the establishment of emission reduction and soil characterization projects in those key source areas.	Yes	CERP Section 4.4.6

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	92	General Comments on CERP • Co-Chairs and co agencies CCV and APCD need to show a more unified presence in CERP document and all 617 documents. Same unified front needs to be shown on social media accounts (i.e. facebook), as related to team efforts regarding the 617 corridor of El Centro, Heber, and Calexico.	Your comment is noted. The District and CCV are constantly working to achieve the most optimal relationship for the successful implementation of AB 617 in Imperial County. That said, there is always room for improvement. The District and CCV will continue to look for ways to strengthen their partnership.	No	NA
F	93	General Comments on CERP • CARB past 617 meeting presentation on emission specific to individual industry activities that emission inventory numbers were not accurate or challenged are also sited here as targeting.	The criteria air pollutant emission inventory numbers shared in the August 26, 2019 and September 6, 2019 drafts of the CERP are the final numbers and do not reflect the numbers presented during CARB's emission inventory presentation given at the April 10, 2019 Steering Committee Meeting. CARB made minor adjustments to the toxic air contaminant emission inventory that are reflected in Section 3.2.2 of the CERP.	No	NA
F	94	General Comments on CERP • 617 Committee is still waiting for a formal presentation to clarify the emission inventory numbers as past promised to do at future AB 617 meeting.	The criteria air pollutant community-level emission inventory for the CERP was finalized in June 2019. CARB presented the data at the two public workshops in El Centro on June 19, 2019. CARB made minor adjustments to the toxic air contaminant emission inventory that are reflected in Section 3.2.2 of the CERP.	No	NA
F	95	General Comments on CERP • The term all sources rather than stationary to capture broader potential of emissions.	The CERP is intended to address all sources of criteria air pollutants (CAPs) and toxic air contaminants (TACs) in the Corridor, including the subset known as stationary sources (e.g., factories). The ICAPCD and CARB collaborated to produce the community-level emissions inventory, including a detailed list of all sources contributing to CAP and TAC emissions in the Corridor.	No	NA
F	96	Section 3.2.5.3 Identification of Existing and Potential land Use Issues • Individual facilities or business activity should not be targeted in documents narrative or photograph.	Figure 3.24 has been removed from the draft CERP.	Yes	NA
F	97	Section 3.2.5.3 Identification of Existing and Potential land Use Issues • "Conditionally Compatible" land use reference is also a form of targeting, and therefore it should be removed.	The purpose of this section is to describe how land use issues impact exposure for sensitive receptors. This section explains the fact that the County has a "conditionally compatible" land use designation. However, we recognize that this is only one of many land use designations in the County. To avoid an uneven discussion, we have removed these sentences from the draft CERP.	Yes	NA
F	98	General Comments on CERP • Currently there are up to four monitors surrounding one industry, same one being targeted.	It is unclear whether the commenter is referring to the locations of existing IVAN monitors (of which there is one in Heber, at the Heber Elementary School), the proposed locations of new AB 617 Community Monitors, or other monitors. The locations of the AB 617 Community Monitors were chosen by the CSC through a collaborative, public, and transparent process.	No	NA
F	99	General Comments on CERP • Enforcement and planning CERP section need to include right to farm and ag burn laws and/or ordinances that recognize these historical practices.	A description of the Agricultural Element of the Imperial County General Plan, including a discussion of the County's Right to Farm ordinance, has been added to Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2

Appendix H.1. Community Input and Questions During Community Steering Committee Meetings

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	100	General Comments on CERP • No opportunity to see Appendices of the CERP.	The District made its best effort to circulate the appendices of the CERP as soon as they were drafted. Five of the eight appendices were circulated with the agenda packet for the August 28, 2019 Steering Committee Meeting. A full draft of the CERP, with appendices, is currently available for review at the District's AB 617 website, https://www.icab617community.org/.	No	NA
F	101	Section 3.1 Community Profile • Subsidence inversion: Include the number of days per year the issue exists.	Historic data on subsidence inversions in Imperial County has not been compiled; therefore, a number has not been added to the CERP. More information on the characteristics of inversions in Imperial County can be found in Section 2.2.1 of the ICAPCD 2018 PM2.5 SIP, which is available at: https://www.co.imperial.ca.us/AirPollution/otherpdfs/2018-IC-PM25SIP.pdf.	No	NA
F	102	Section 3.1 Community Profile • Non-attainment reference must include "but for" language.	Section 3.1 has been updated to make references to the "but for" nonattainment status of Imperial County as it relates to the $PM_{2.5}$ annual and 2008 8-hour ozone National Ambient Air Quality Standards (NAAQS).	Yes	CERP Section 3.1
F	103	Section 3.2.1.1 Evaluation of Existing Data • Data points in all IVAN graphs (Figures 3.7-3.9) are difficult to understand. Scale of graphs does not allow interpretation of the data. Suggest using shorter time periods for each location to allow better interpretation. Also provide numeric data.	While there were substantial improvements made in the quality of the data in Figures 3.7-3.9 from the August 26, 2019 draft to the September 6, 2019 draft, we agree that these figures remain difficult to read. We also recognize that these figures represent a subset of the historic community monitoring data in the Corridor and thus may present an incomplete picture. To date, historic community monitoring data from the Corridor has not been analyzed as part of the AB 617 process. For these reasons, Figures 3.7-3.9 have been removed from the CERP.	Yes	NA
F	104	Section 3.2.1.1 Evaluation of Existing Data • IVAN and regulatory Monitors must include a correlation discussion and include information if the two monitoring systems are collecting similar data.	As mentioned above, the figures featuring historic community monitoring data have been removed from the CERP. Discussion regarding the correlation between the IVAN monitors and the regulatory monitors is more appropriate in the CAMP. Table 7.2 in the CAMP describes the data quality information for the Dylos DC1700 units used in the IVAN network.	Yes	CAMP Table 7.2
F	105	Section 3.2.5 Sensitive Receptors and Land use Policy • Agricultural Element language must be included in this section as guiding principle confirming the Imperial County's Right to Farm Act.	A description of the Agricultural Element of the Imperial County General Plan, including a discussion of the County's Right to Farm ordinance, has been added to Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2
F	106	Section 3.2.5.3 Identification of Existing and Potential land Use Issues • This section challenges the authority of the Imperial County Board of Supervisors and Planning Department. It is not appropriate to single out a one potential land use issue in this document.	CARB's Community Air Protection Blueprint requires CERPs to perform an assessment of sensitive receptor locations and how land use issues may impact exposures. This is the distinctive purpose of Section 3.2.5.3. In addition, this and the proceeding section (3.2.5.2) describe in detail land use authority in Imperial County.	No	NA
F	107	Section 3.2.5.3 Identification of Existing and Potential land Use Issues • All industry or fence line location to Heber need to be identified in CERP, not just one industry which is again targeting.	In response to this comment, the last sentence to the first paragraph in this section has been revised as follows, "In addition, during the fourth Steering Committee meeting, attendees expressed concern about the proximity of Heber Elementary School to the nearby water treatment plant, geothermal plant, aggregate plant, feedlot, open areas, and general farming."	Yes	CERP Section 3.2.5.3

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	108	Section 5.3.1.2 CARB Enhanced Enforcement Measures, Measures to Promote Compliance •"(2) Coordinate and conduct inspections of stationary sources with Air District Staff" Item #2 falls under the responsibility of the ICAPCD and the two paragraphs should be removed. It can be replaced with: CARB will make themselves available to coordinate with other agencies with enforcement authority in Imperial County.	The text for this measure was changed between the August 26, 2019 draft and the September 6, 2019 draft to read as follows: "(2) Coordinate and conduct inspections of stationary sources with ICAPCD staff when assistance is requested by the District: Based on Steering Committee input and upon evaluations of concerns, the District can request assistance from CARB and coordinated joint inspections of stationary sources, as needed." We believe these changes address the commenter's concern.	Yes	CERP Section 5.3.1.2
F	109	General Comments on CERP • Best use to use all sources in document rather than one type of source in order to best capture the true activities and impacts on the ground.	The CERP is intended to address all sources of CAPs and TACs in the Corridor, including the subset known as stationary sources (e.g., factories). The ICAPCD and CARB collaborated to produce the community-level emissions inventory contained in the CERP.	No	NA
F	110	General Comments on CERP • Scrappage programs should be used to maximize emission reductions	Strategy M-6 in the draft CERP is targeted at replacing diesel school buses with electric or natural gas school buses. The strategy targets buses that are model year 1999 or older in order maximize emission reductions.	Yes	CERP Section 4.4.8
F	111	General Comments on CERP • Funding technology advancement is contrary to the purpose of AB 617 – current year incentives should be used for available technologies	Strategy M-6 in the draft CERP focuses on technology that is commercially available and able to be implemented in a 5-year timeframe, starting in 2020.	Yes	CERP Section 4.4.8
F	112	General Comments on CERP • Incentives should prioritize technologies that can maximize emission reductions today	The District will continue to utilize incentive funds available from the State and follow the eligibility criteria and guidelines of those programs. Strategy M-6 in the draft CERP focuses on technology that is commercially available and able to be implemented in a 5-year timeframe, starting in 2020. Potential technologies include electric and natural gas school buses.	Yes	CERP Section 4.4.8
F	113	General Comments on CERP • Emission Reduction Effectiveness	Strategy M-6 in the draft CERP currently evaluates the emission reductions and cost-effectiveness associated with replacing diesel school buses with electric school buses. The District also intends to evaluate the cost-effectiveness and feasibility of replacing diesel buses with natural gas buses under Strategy M-6.	Yes	CERP Section 4.4.8
F	114	General Comments on CERP • Purpose of the Planning Department Comments is to ensure that the Draft CERP correctly represents the land use regulations, role and authority of the County of Imperial and by extension the Planning & Development Services Department.	Your comment is noted.	No	NA
F	115	General Comments on CERP • The County is the authority for all land use regulations covering land located in the unincorporated area of Imperial County.	Your comment is noted and is consistent with the text in Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	116	General Comments on CERP • The County is responsible for all land excluding those areas located within the Incorporated City of El Centro and Incorporated City of Calexico.	Your comment is noted and is consistent with the text in Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2
F	117	General Comments on CERP • State of California requires the County to adopt a master land use regulation, known as the General Plan.	Your comment is noted and is consistent with the text in the description for Strategy L-2 in Section 4.4 of the draft CERP.	Yes	CERP Section 4.4
F	118	General Comments on CERP • The County's General Plan includes 10 Elements: Land Use, Agricultural, Circulation, Open Space, etc.	Your comment is noted.	No	NA
F	119	General Comments on CERP • Agricultural element identifies the County of Imperial's goal of preserving uses to agriculture. The Element includes the "Right to Farm Act" which reaffirms the County's commitment for the continuation of farming.	Your comment is noted. A description of the Agricultural Element has been added to Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2
F	120	General Comments on CERP • The Land Use Element, breaks the County into nine land use designations, including agriculture, urban, industrial, open space, community, etc…the Element is structured singular to the Agricultural Element, with goals, objects, policies and procedures.	Your comment is noted. A description of the Land Use Element is included in Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2
F	121	General Comments on CERP • Heber Urban Area Plan, which acts a "Mini" General Plan for the incorporated Community of Heber.	Your comment is noted and is consistent with the description of the Heber Urban Area Plan in Section 3.2.5.2 of the draft CERP.	Yes	CERP Section 3.2.5.2

Appendix H.1. Community Input and Questions During Community Steering Committee Meetings

Imperial County Year 1 Community Emission Reduction Program Plan
for the El Centro-Heber-Calexico Corridor

Data Source[1]	Item	Community Input or Question	Answer	Addressed in CAMP or CERP	CAMP or CERP location[2]
F	122	Section 3.2.5.3 Identification of Existing and Potential Land use Issues •"Conditionally Compatible" language is incorrect as in a land use perspective it could be misinterpreted. It must be removed.	The purpose of this section is to describe how land use issues impact exposure for sensitive receptors. This section explains the fact that the County has a "conditionally compatible" land use designation. However, we recognize that this is only one of many land use designations in the County. To avoid an uneven discussion, we have removed these sentences from the draft CERP.	Yes	NA

Notes:

[1] Data Sources:

A: ICAPCD AB 617 Community Steering Committee Question & Answer Tracking Spreadsheet
B: CARB Enforcement Plan for ICAPCD CERP, July 26, 2019
C: Harder & Co. AB 617 Indoor Air Filtration Projects Survey Results, August 20, 2019
D: Harder & Co. AB 617 Mitigation Projects Survey Results, August 7, 2019
E: Community Steering Committee Meeting Minutes (November 14, 2018 - August 14, 2019)
F: Community Steering Committee Member and Public comments on September 6, 2019 Draft CERP (July 26, 2019 - September 16, 2019)

[2] The section references provided in this table are consistent with the August 14, 2019 draft of the CAMP and the August 22, 2019 draft of the CERP.

Abbreviations:

AB - Assembly bill
AQMIS - Air Quality and Meteorological Information System
AQS - Air Quality System
AQ-SPEC - Air Quality Sensor Performance Evaluation Sensor
BAM - Beta Attenuation Mass Monitor
CA - California
CAMP - Community Air Monitoring Plan
CARB - California Air Resources Board
CCV - Comite Civico del Valle
CERP - Community Emissions Reduction Program
DPR - Department of Pesticide Regulation
EPA - Environmental Protection Agency
ERC - Emission Reduction Credit
°F - Degrees Fahrenheit
FRM - Federal Reference Method
ICAC - Imperial County Agricultural Commission
ICAPCD - Imperial County Air Pollution Control District
IVAN - Identifying Violations Affecting Neighborhoods
NOx - Oxides of Nitrogen
PM2.5 - Particulate matter less than 2.5 micrometers
PM10 - Particulate matter less than 10 micrometers
SIP - State Implementation Plan
TOG - Total Organic Gases
VOC - Volatile Organic Compounds
US - United States

APPENDIX H.2
AB617 COMMUNITY STEERING COMMITTEE MEETING SURVEY RESULTS

AB 617 Indoor Air Filtration Survey Results – August 2019

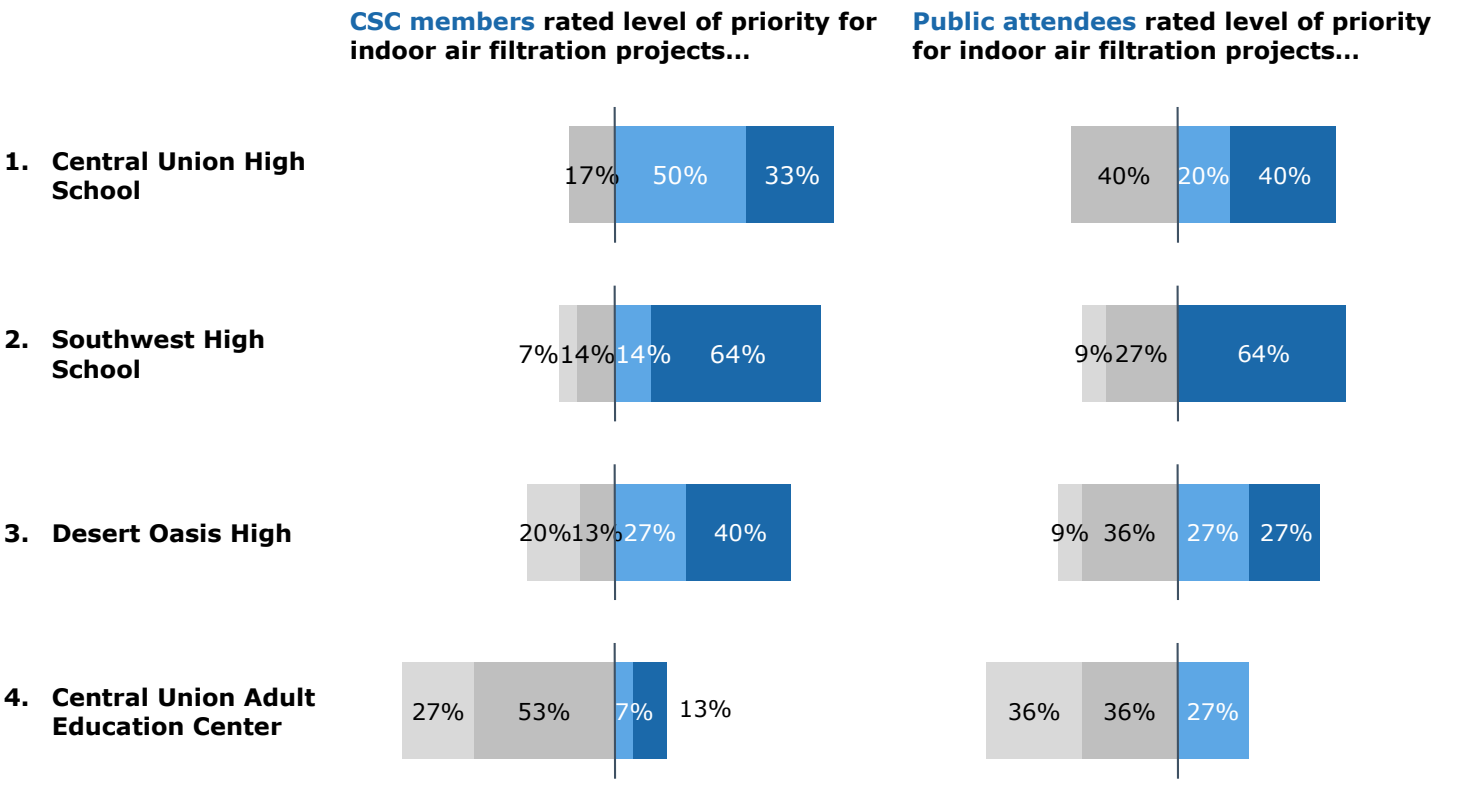
Respondent role

15 CSC members completed the survey

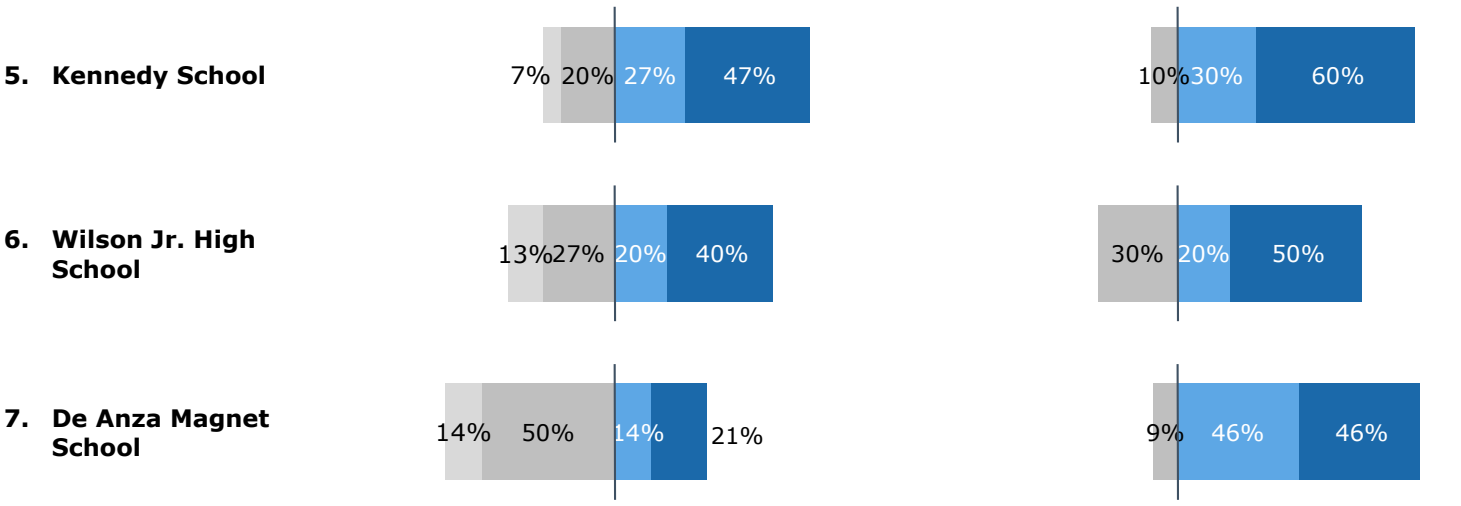
12 Public attendees completed the survey

Level of priority

El Centro High Schools



El Centro Middle Schools



No priority | Low priority | Medium priority | High priority

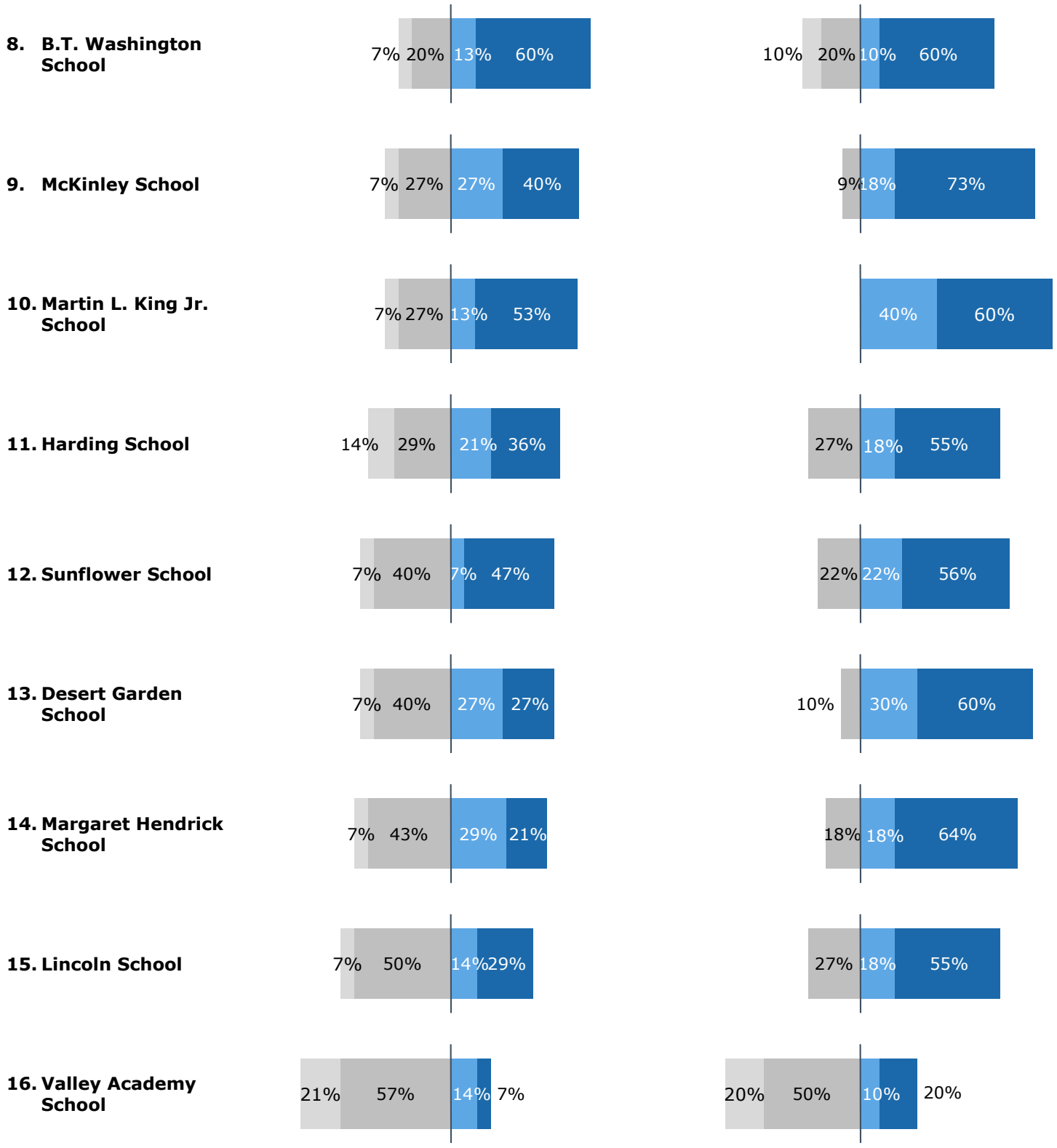
harder + co | community research

Level of priority

El Centro Elementary Schools

CSC members rated level of priority for indoor air filtration projects...

Public attendees rated level of priority for indoor air filtration projects...



Level of priority

Heber Elementary Schools

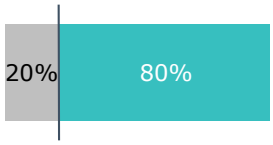
Level of priority

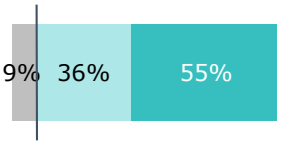
Calexico Middle Schools

CSC members rated level of priority for indoor air filtration projects...

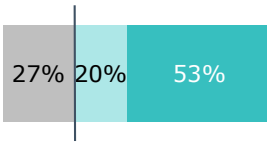
Public attendees rated level of priority for indoor air filtration projects...

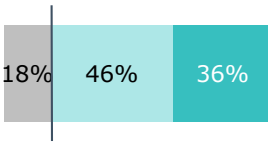
26. Enrique Camarena





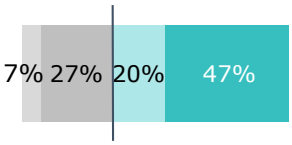
27. William Moreno Jr. High

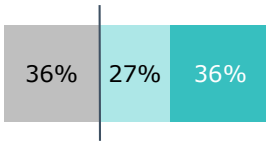




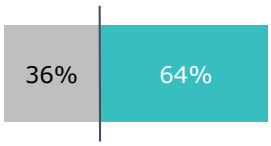
Calexico High Schools

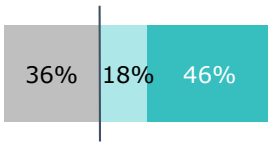
28. Calexico High (10-12th)



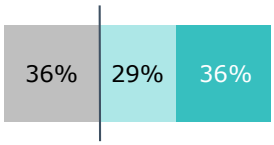


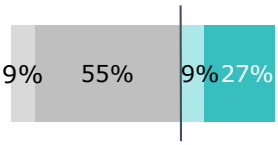
29. Calexico High (9th)





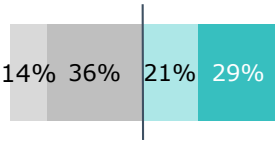
30. Aurora High



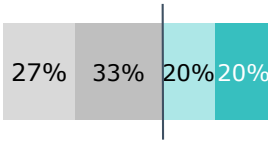


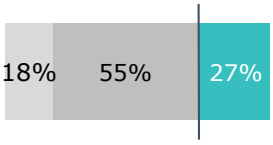
Other Calexico Schools

31. Calexico Academy School



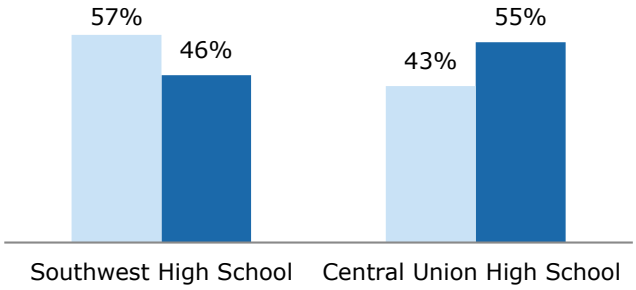
32. San Diego State University, IV Campus



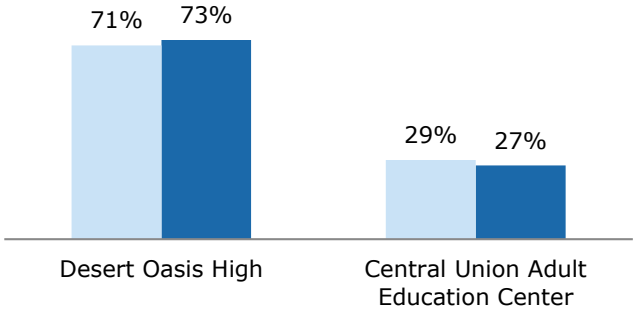


Overall priority schools

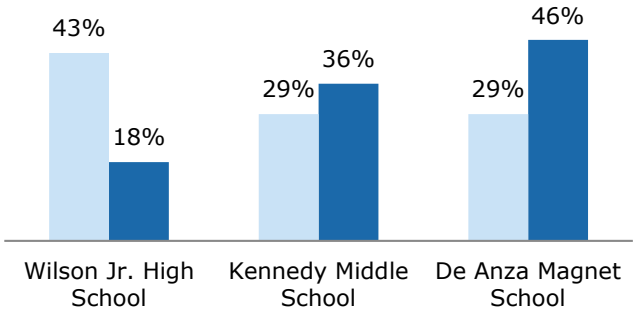
Top priority high school in El Centro



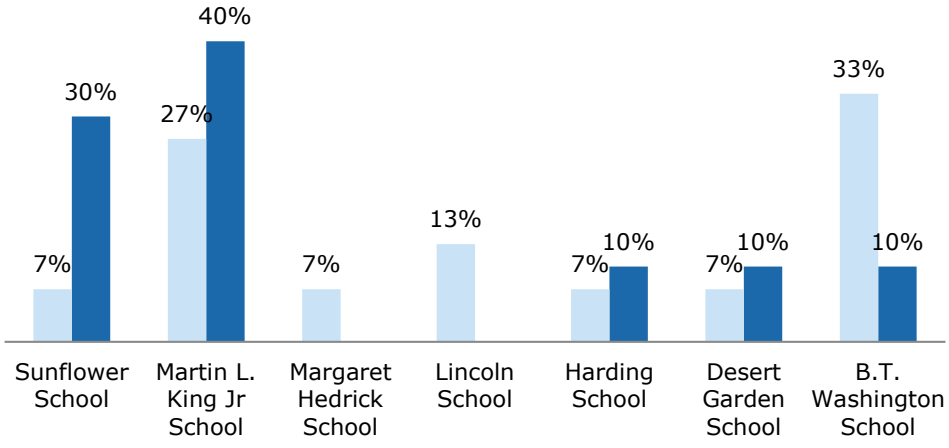
Top priority continuation school in El Centro



Top priority middle school in El Centro

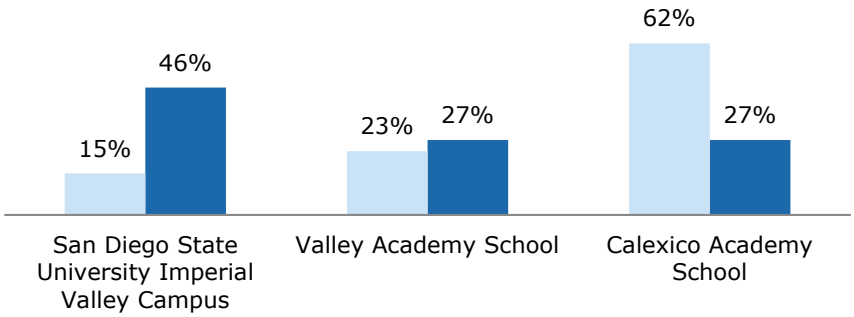


Top priority elementary school in El Centro

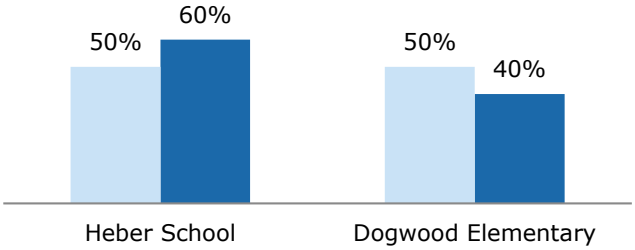


CSC members Public attendees

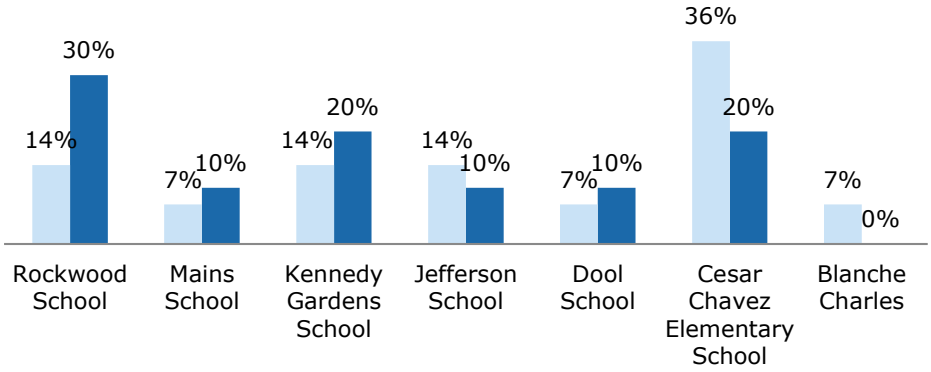
Top priority alternative or higher education school in the corridor



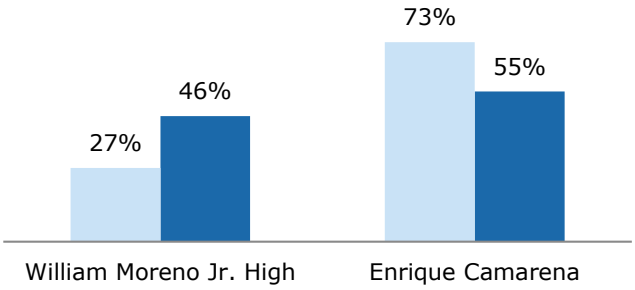
Top priority elementary school in Heber



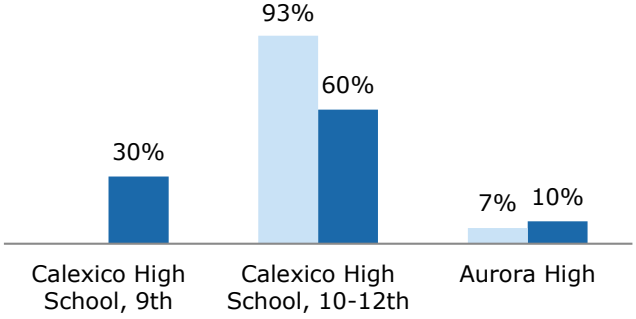
Top priority elementary school in Calexico



Top priority Middle school in Calexico



Top priority high school in Calexico



AB 617 Mitigation Projects Survey Results – August 2019

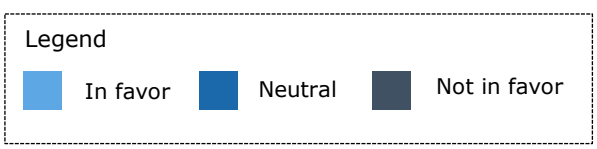
Respondent role

10 CSC members completed the survey

12 Public attendees completed the survey

Level of favorability

Mitigation Strategy	CSC members rated level of favorability with mitigation stategies...	Public attendees rated level of favorability with mitigation stategies...
1. Expansion of School Flag Program	80% / 10% / 10%	55% / 18% / 27%
2. Green-space projects	70% / 30%	64% / 27% / 9%
3. School bus replacement projects	70% / 20% / 10%	75% / 17% / 8%
4. Establishment of other air quality notification programs and education/outreach programs	70% / 10% / 10%	36% / 55% / 9%
5. Paving of unpaved parking lot projects	70% / 10% / 20%	50% / 33% / 20%
6. Indoor air filtration projects at schools/sensitive receptor locations	67% / 33%	83% / 17%



harder + co | community research

Word used to describe the overall experience with the current status of AB 617 in the corridor*

Cities represented in survey*

*Responses were combined for CSC members and public attendees

Amount of funding

Mitigation Strategy	CSC members selected the amount of funding for mitigation stategies...	Public attendees selected the amount of funding for mitigation stategies...
1. Establishment of other air quality notification programs and education/outreach programs	100%	86%, 14%
2. Expansion of School Flag Program	75%, 25%	100%
3. Green-space projects	75%, 25%	50%, 38%, 13%
4. Indoor air filtration projects at schools/sensitive receptor locations	67%, 33%	60%, 40%
5. School bus replacement projects	50%, 38%, 13%	80%, 10%, 10%
6. Paving of unpaved parking lot projects	50%, 40%, 10%	100%

Legend
0 – 25% 26-50% 51-75% 76-100%