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Santa Barbara County
Air Pollution Control District

May 13, 2002

MAY 2002
EPA AIR DOCKET

Air and Radiation Docket and Information Center
Docket Number A-2201-31
United States Environmental Protection Agency
401 M Street, SW., Room M-1500 (Mail Code 6102)
Washington, DC 20460

Subject: Implementation of the 8-hour NAAQS; 1-hour NAAQS Revocation

As Director of the Santa Barbara County Air Pollution Control District, I would like to thank the U.S. EPA staff for participating in a conference call on May 1, 2002, to discuss issues with California representatives associated with implementing the new 8-hour National Ambient Air Quality Standard (NAAQS) for ozone. We have already provided you our comments on the implementation of the 8-hour standard under separate cover, but, as a follow-up to the conference call, we feel that it is important to emphasize our concerns regarding the potential revocation of the existing 1-hour standard.

The 1-hour ozone standard has set the stage for the preparation of clean air plans and the adoption of control technologies throughout California and the rest of the nation. The gains in improving air quality have been dramatic in California. It is imperative that this momentum not be lost inadvertently through an early revocation of the 1-hour standard. Specifically, we are concerned with any scenario that sets new future attainment dates for the 8-hour standard, sets new timelines for the implementation of control technology to be in place, and takes away the commitments for progress that exist under the 1-hour standard clean air plans.

Santa Barbara County recently attained the 1-hour standard, and will likely be classified as attainment for the new 8-hour standard. Our air quality has steadily improved over the past decade due to the efforts of federal, state and local governments along with businesses, industry and the public. We are, however, impacted by the transport of ozone and ozone precursors from neighboring air districts that are currently classified as "severe" and "extreme" for the 1-hour ozone NAAQS under Table 1 (Section 181) of the Clean Air Act. We believe that the requirements established to attain the 1-hour ozone NAAQS should remain in place until one of two conditions are met: 1) a Maintenance Plan for the 1-hour standard is approved for each area to ensure that areas continue to make progress under the current regulatory setting, or 2) a plan with enforceable commitments to attain the 8-hour standard is approved by EPA. To revoke the 1-hour standard prior to having the 8-hour attainment plans in place would be to relax the current progress and keep our citizens exposed to unhealthful air for a longer period of time. It is critical that all areas of Southern California continue to make progress in reducing emissions and we believe that the deadlines and commitments already in place for the 1-

Douglas W. Allard
Air Pollution Control Officer
26 Castilian Drive B-23, Goleta, CA 93117 Fax: 805-961-8801 Phone: 805-961-8800

hour standard must be retained. If the specific deadlines and requirements associated with the 1-hour NAAQS are lost when the standard is revoked, we fear that areas may lose momentum that we believe is crucial for Santa Barbara County's continued long-term air quality improvements.

We look forward to working closely with EPA staff on these important issues. If you have any questions or comments, please contact Tom Murphy of my staff at (805) 961-8857.

Sincerely,

Doug Allard

Douglas W. Allard

cc: Larry Allen, SLOAPCD
Dick Baldwin, VCAPCD
Cynthia Marvin, CARB
Dave Jesson, USEPA
Tom Murphy, SBCAPCD