



Legislation Text

File #: 20-283, Version: 1

Memorandum

Date: April 7, 2020

To: The Honorable Moke Simon, Chair, Lake County Air Quality Management District Board of Directors

From: Douglas Gearhart, APCO

Subject: Request to authorize the APCO to sign and submit the Ozone Emergency Plan Exemption Request to ARB and EPA.

Executive Summary: (include fiscal and staffing impact narrative):

Lake County is classified as attainment for all federal and state ozone standards and has been so since the 1980s. Lake County had a single 1-hour ozone concentration equal to 0.103 parts per million (ppm) since ozone measurements started. This value occurred during the 2017 wildfires and was likely the result of other interference products affecting the ozone analyzer. The requirement to develop an emergency episode plan was triggered by having the single one (1) hour ozone concentration above 0.10 ppm.

The Federal Clean Air Act (CAA) 40 CFR Section 51.152. requires states to develop emergency episode plans designed to prevent air pollution in the region from reaching significant harm levels. Lake County has never reached a level that would trigger the utilization of an ozone emergency episode plan. With no major sources of ozone and only minor sources of ozone precursors, there are no significant steps that could be taken other than public notifications. The Ozone plan would require staff to do the work we already do during air pollution events, so developing an ozone plan is another burden requiring updating, documentation, auditing, etc, which requires staff time and funding and the plan would reduce local flexibility to react to local needs.

As a result, I am recommending that this Board authorize submitting the attached request for an exemption from the requirement to develop an ozone emergency plan to reduce staff time and costs related to developing and maintaining a plan, and to ensure that local control and local flexibility are maintained.

If not budgeted, fill in the blanks below only:

Estimated Cost: _____ Amount Budgeted: _____ Additional Requested: _____ Future Annual Cost: _____

Consistency with Vision 2028 and/or Fiscal Crisis Management Plan (check all that apply):

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Well-being of Residents | <input checked="" type="checkbox"/> Public Safety | <input type="checkbox"/> Infrastructure | <input type="checkbox"/> Not applicable |
| <input type="checkbox"/> Economic Development | <input checked="" type="checkbox"/> Disaster Recovery | <input type="checkbox"/> County Workforce | <input type="checkbox"/> Technology Upgrades |
| <input type="checkbox"/> Community Collaboration | <input checked="" type="checkbox"/> Business Process Efficiency | <input type="checkbox"/> Clear Lake | <input type="checkbox"/> Revenue Generation |
| | | | <input checked="" type="checkbox"/> Cost Savings |

If request for exemption from competitive bid in accordance with County Code Chapter 2 Sec. 2-38, fill in blanks below:

Which exemption is being requested?

How long has Agreement been in place?

When was purchase last rebid?

Reason for request to waive bid?

Recommended Action: That the Board of Directors authorize the APCO to submit the Ozone Emergency Plan Exemption Request to ARB and EPA.