



Mendocino County Air Quality Management District

Mendocino County Air Quality Management District 2020 Annual Report to the Board October 6, 2020

1. Air Quality: Mendocino County remains in attainment with all National and all California Ambient Air Quality Standards except CA Particulate Matter (PM) 10 microns. Our typically excellent air quality has sustained significant wildfire smoke impacts consistently since 2017. The District issues Air Quality Advisories when the Air Quality Index (AQI) due to smoke impacts from local fires reaches unhealthy for sensitive groups or worse.

In 2019, The East fire began burning 23 miles east of Covelo. District deployed monitoring equipment and meteorological prognostics determined “unhealthy” AQI from June 16-19, 2019 in Covelo. On July 26 2019, a District Advisory was issued due to the Carr wildfire outside our County. Several other wildfires in surrounding counties, particularly, the Kincade Fire (78,758 acres) in Sonoma County caused very little smoke impact to Mendocino County.

In 2020 the August Complex Fire and Oak Fires, in addition to wildfires north, south and east of Mendocino County in July and August caused significant air quality impacts. Substantial local impacts occurred due to these fires between September 7 and 14, 2020 when the AQI reached the very unhealthy to hazardous range, followed by AQI excursions into the unhealthy range through October 2020. District staff advised County Risk Management regarding evaluation of complaints of smoke impacts in County buildings.

2. Air Monitoring: Monitoring data from the August Complex and Oak Fires will be demonstrated to be an “exceptional event” and submitted to the state and USEPA for exclusion from our annual average concentrations of PM and ozone so as not to impact our clean air attainment status. The CA Air Resources Board (ARB) identified no issues with the District’s air ozone, PM2.5 and PM10 monitoring stations, operations, or records during our last annual performance audit on August 5, 2020. Our next audit is December 1, 2020. Adherence to more stringent quality assurance/quality control and recordkeeping procedures required by EPA and ARB continues to require more daily staff time.

We purchased a new air monitoring server and are beginning to install AirVision software to receive, process and transmit data from our PM and ozone monitors to ARB and EPA. AirVision is widely used amongst Air Districts and has better support services than the software we will

abandon. AirVision will also improve efficiency by reducing staff time evaluating the monitoring data.

3. Permitting of Stationary Sources of Air Contaminants: A permit shall be obtained from the District prior to starting construction, modification, operation or use of any stationary, portable, indirect source or large grading operations which may cause, potentially cause, reduce, control or eliminate the emission of air contaminants. We renewed 450 active permits at 322 permitted facilities in Fiscal Year 2020/2021. Thus far in 2020 the District received 54 Authority to Construct (ATC) permit applications, compared with 36 in 2019.

The District added indemnification language to permit application cover sheets and to the General Conditions of ATC permits and Permits to Operate.

4. Outdoor Burn Program: Cal Fire has suspended the burn ban, but we remain in Fire Season. Open burning season is expected to start sometime in early December, according to sources at CalFire. Historically the District has issued approximately 1800 fee-based burn permits each year in addition to those issued by local fire agencies. In 2018 CalFire at the State level began issuing free 62A residential burn permits online. In addition to being administratively awkward for the District, without an Air District permit the public is not receiving conditions for compliant burning, which negatively impacts our mandate to enforce illegal burns. Since the District is writing fewer residential burn permits since 2018, permit fees supporting the District's burn permitting and enforcement program have declined. Fire agencies as well as the District rely on our illegal burn enforcement Program to fine or otherwise deter non-compliant and nuisance burners.

A Memorandum entitled "Legal Framework for Burning" was prepared by Christiana Darlington, the District's Attorney in 2019. The APCO and Ms. Darlington brought this forward to County Counsel Curtis in January 2020 and to CEO Angelo in late March 2020. We were advised by County Counsel that all available resources were devoted to the Covid emergency and to hold the item until such time as the Board would have the time it warranted. As almost a year has passed, we plan to bring this memorandum to the Board for discussion and possible action during the first quarter of 2021 with the new District Board of Directors.

In May 2019 the District Board directed the Air Pollution Control Officer to work with Fire Agencies and community partners to identify barriers to fire fuel (Vegetation) Management and develop a plan to streamline AQMD processes that support vegetation management, including investigation of the feasibility of implementing a unified application and payment model for burn permitting. The District has since implemented an online burn permit application and payment system through its database. Further refinements will improve efficiency for District staff.

The APCO began discussions with the Fire Agencies and Board Ad Hoc Committee in mid-2019 to investigate the feasibility of implementing a unified application and payment model for burn permitting in our County. The APCO attended a Fire Chiefs' Association meeting in July 2019 to begin related discussions. District staff met with the Ad Hoc Committee regarding a proposed plan for using the District's database as a tool for a unified application and payment model for burn permitting. Burn permit data entered into the database is currently used for mandated reporting of biomass burned in our County to the CA Air Resources Board.

A roadblock occurred in November 2019 when the APCO, at the Ad Hoc's request, sought unsuccessfully to set up an Ad Hoc meeting with the previous Chief of CalFire MEU unit. Based on a recent conversation with the current CalFire MEU Chief Gonzalez, he plans to take this idea to the Local Fire Agencies for further discussion. The APCO stands ready to collaborate with CalFire and other fire agencies regarding other possible modifications for streamlining the permitting process. We had begun discussions with our database contractor and would like to bring a contract forward to the Board for approval once the scope of work is clarified.

District staff participated in Land Management Burn Symposiums in 2018 and 2019 by presenting the procedures for obtaining Smoke Management Plans and practices to help reduce smoke impacts.

The District has improved its procedures for management of its Smoke Management Program (SMP). We are using the Prescribed Fire Information Reporting System (PFIRS) described further below under the Prescribed Burn Program. We have recently implemented an email based notification system for Approval of SMP Ignition Requests which allows District staff to receive and approve ignition requests from applicants remotely and outside of office hours.

District staff continues to attend biennial open Fire Chiefs' Association meetings. District staff created an educational video for fire agencies to further understand the District's concern regarding smoke impacts to the public. The APCO is a member of the County Fire Safe Council's Technical Advisory Group.

5. Prescribed Burn Program: In late 2018, the District implemented the Prescribed Fire Program working closely with the California Air Resources Board (CARB). On January 14 & 15, 2020 in collaboration with CAPCOA, CARB, and CalFire, the District hosted a training with stakeholders such as land managers, forestry personnel, private owners, fire personnel and other air districts to discuss and train in regards to prescribed burning. The group discussed a variety of topics including, but not limited to, fire management legislation, grants, reporting requirements, funding and outreach. One important role for the District has been the incorporation of the statewide Prescribed Fire Information Reporting System (PFIRS). This online system allows land managers, fire agencies and air districts to coordinate burn ignition requests and approvals in a comprehensive manner. During the 2019/2020 burn season there was considerable prescribed burning in Mendocino County conducted by both land managers and CalFire. Prescribed burning of the Western Hills and Eastern Hills of Ukiah are good examples of this coordination. Another aspect of the program encompasses the issuance of portable air monitoring equipment. Through the CACHE program, the District has been allocated monitoring equipment to use and capture air impacts during these prescribed burns. Furthermore, the District is designated as a center to stage the monitoring equipment and have the ability to lend monitoring equipment to other districts/agencies. In the past year, equipment from the monitoring CACHE have been deployed to Laytonville, Cloverdale, Covelo, Yorkville, and Ukiah valley areas by MCAQMD, as well as in Lake County and Northern Sonoma Air Districts' jurisdictions.

6. Carl Moyer Program (CMP): The state Carl Moyer Grant Program is administered by local air districts and provides grant funding for cleaner diesel engines and equipment. For CMP Year 20 (FY 2017-18) and Year 21 (FY 2018-19), the District has funded 14 projects, with total grant awards of \$466,449.00. District staff works with the approved applicants to ensure the projects are completed and funds are expended within the time frame specified in the Program Guidelines.

Earlier this year, the District received 40 applications for CMP Year 22 (FY 19-20), which are being evaluated for eligibility and funding with the \$272,073 currently available.

7. Funding Agricultural Replacement Measures for Emission Reductions (FARMER):

This Program is targeted to the reduction of emissions from pieces of off-road, diesel-fueled, mobile equipment, stationary equipment (water pump engines), and on-road vehicles used in agricultural operations. Following CMP Guidelines and FARMER Program Policies, the District submits eligible applications for consideration to the Shared Allocation Pool (SAP), which is managed on behalf of the 18 small districts by Placer County APCD, and has been awarded the following:

FARMER Year 1 (FY 2017-18): 8 projects totaling \$277,413.19;

FARMER Year 2 (FY 2018-19): 3 projects totaling \$181,694.52;

FARMER Year 3 (FY 2019-20): 1 project totaling \$21,480.00.

8. School Bus Replacement Program: Through Legislation AB 923, the District receives Motor Vehicle Fees that are earmarked for purchasing lower-emission school buses. In 2018 and 2019, the District directly distributed a total of \$1,291,468.83 to 4 school districts in Mendocino County for 8 bus replacements.

9. Woodsmoke Reduction Pilot Program: This Program is supported by the California Climate Investments (CCI) program, a statewide initiative that puts Cap-and-Trade dollars to work. The wood stove replacement voucher program is subject to state requirements and agreements with the California Air Resources Board (CARB) and (CAPCOA). The Program offers vouchers to homeowners in Mendocino County for replacement of a non-EPA certified wood stove, fireplace insert, or open-hearth fireplace used as a primary source of heat with a new, cleaner burning EPA-certified wood or pellet stove or fireplace insert, a natural gas or propane heating device, or an electric heating device. Replacement projects benefiting low-income households in low-income communities are ranked as highest priority. Reducing emissions from residential wood burning devices can lower ambient concentrations of particulate matter and may help the District achieve attainment status for the state PM10 standard. In 2019, with \$135,000 in funding, the District was able to achieve 30 woodstove change-outs (26 certified woodstoves, 2 certified fireplace inserts, and 2 propane heaters). The District currently has \$125,210 available for continued participation in the Woodstove Replacement Program and will be soliciting project applications shortly.

10. AB 617 Community Air Protection (CAP):

This Program is supported by the California Climate Investments (CCI) program, a statewide initiative that puts Cap-and-Trade dollars to work. The District has engaged with community members and identified various grant project types that would support clean air in our community, including School Filtration, cleaner farm equipment, and replacement of uncertified woodstoves and open fireplaces with cleaner burning devices in population centers. The District currently has \$226,980 available for funding of eligible projects.

11. Cannabis: The District is reviewing cannabis permit application checklists of equipment and processes that may require a District permit for use by the County Planning and Building Departments and the Assessor's Office.

12. Pellet Mill: Emissions compliance was demonstrated on August 25, 26 and September 3, 2020 as documented in TRC Environmental Corp.'s Report of Emissions Compliance Study, Forest Energy Mendocino, Main Dryer/Scrubber and Dust Collection Baghouse, Calpella, CA dated 9/21/2020. Emissions compliance was previously demonstrated on November 14, 2019. Currently no violations or basis for enforcement action against the facility exists. A Health Risk Assessment Modeling report by Stantec indicated cancer and non-cancer risks from Toxic Air Contaminants emitted are very low. Health risks are well below the threshold risks that trigger notification of neighbors or risk reduction. Please see the uploaded Memorandum and Health Risk Assessment Modeling Report for more detailed information.

13. City of Ukiah Landfill Closure: State law requires that final closure of landfills, including installation of an impermeable membrane, or cap, be performed within one to three years of cessation of waste deposition. The inactive City of Ukiah landfill has been out of compliance for almost two decades regarding final closure. A recent Greenhouse Gas (GHG) regulation required that a methane gas collection and control system (GCCS) be installed at larger landfills no later than 30 months after the approval of the design plan by the District on ARB's behalf. The District approved the GCCS plan for the Ukiah landfill and the system was required to be installed by July 2, 2016. City staff modified the final closure plan necessitating resubmittal and another review/approval by the regulatory agencies. The Environmental Impact Report was revised and certified. However, the choice of cover design has been challenged. This delays issuance of WDR by the Water Board. The closure work is currently estimated to occur in 2022/23. The District provided city staff with several options for coming into compliance with GHG regulations. Staff continue to work with the City to define increments of progress that are realistic and acceptable to the ARB, CalRecycle, Environmental Health, and Regional Water Quality Control Board.

As always, should you have any questions regarding any of these items, please contact me.

Sincerely,

Barbara Moed
Air Pollution Control Officer