

Technical Support Document for 2008 Ozone NAAQS Designations

California Area Designations for the 2008 Ozone National Ambient Air Quality Standards

Technical Analysis for Calaveras County, CA

Figure 1 is a map of the Calaveras County, CA nonattainment area. The map provides other relevant information including the locations and design values of air quality monitors, county names and boundaries and indicates EPA's nonattainment designation. Also shown is the boundary of the existing area that is designated nonattainment for the 1997 8-hour ozone NAAQS.

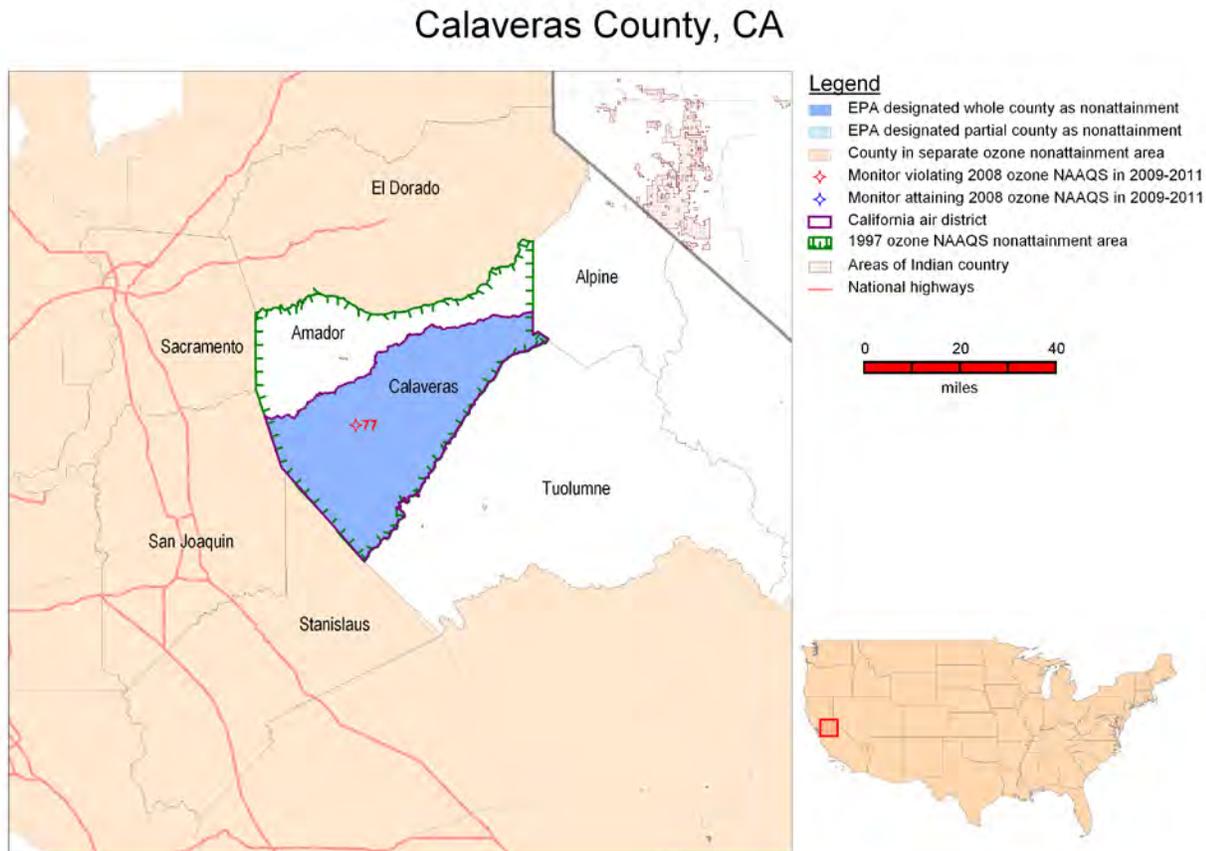


Figure 1

Note: The map shown in Figure 1 provides 8-hour ozone design values in parts per billion (ppb) based on data from the 2009-2011 period (i.e., the 2011 design value, or DV), which are the most recent years with fully-certified air quality data. For each particular area, Factor 1 and Appendix 3 describe the air quality data relevant for our nonattainment decisions.

The Central Mountain Counties nonattainment area has previously established boundaries associated with the 1997 8-hour ozone NAAQS. Although these counties were designated as a separate nonattainment area for the 1997 ozone NAAQS, EPA believed, as we still believe, that the strongest contribution to the violations in the mountain counties comes from the San Joaquin Valley. However, for the 1997 ozone NAAQS, the state requested grouping Amador and Calaveras counties as one nonattainment area, separate from the San Joaquin Valley area, citing existing inter-county coordination, similarities in pollution transport paths, and support from the other factors analyzed. EPA accepted the state's recommendations and in 2004 designated Amador and Calaveras counties as one multi-jurisdictional nonattainment area (Central Mountain Counties).

In March 2009, California recommended that the Amador and Calaveras counties be designated as a nonattainment area for the 2008 ozone NAAQS based on air quality data from 2006-2008. (Letter from James Goldstene, Executive Officer, California Air Resources Board, to Laura Yoshii, Acting Regional Administrator, U.S. EPA Region IX, dated March 11, 2009.) California provided an update to the original recommendation in October 2011 based on air quality data from 2008-2010 and preliminary 2009-2011 data and indicating to EPA that it intended to early-certify data for 2011 so that it could be used for the final designations. Based on preliminary 2011 air quality data, California revised its recommendation for the Central Mountain Counties nonattainment area to include only Calaveras County and to exclude Amador County. The 2009 and 2011 recommendations are based on data from Federal Equivalent Method (FEM) monitors sited and operated in accordance with 40 CFR Part 58. (Letter from Lynn Terry, Deputy Executive Officer, California Air Resources Board, to Deborah Jordan, Director, U.S. EPA Region IX Air Division, dated October 12, 2011.)

In December 2011, EPA sent California a letter conveying our preliminary intention to designate Amador and Calaveras counties as the Central Mountain Counties nonattainment area for the 2008 ozone NAAQS and informing California that it would need to submit certified, quality-assured data to EPA by February 29, 2012 in order for EPA to consider 2011 data in our final decisions. The letter also conveyed that the state should further provide a multi-factor analysis justifying the exclusion of Amador County from the designated nonattainment area for the 2008 ozone NAAQS if it continued to support that recommendation. (Letter from Jared Blumenfeld, Regional Administrator, U.S. EPA Region IX, to Edmund G. Brown, Jr., Governor of California, dated December 9, 2011.) EPA received certified, quality-assured 2011 data before February 29, 2012 for Amador and Calaveras counties, as well as a multi-factor analysis justifying the exclusion of Amador County from the designated nonattainment area for the 2008 ozone NAAQS. (Letter from James Goldstene, Executive Officer, California Air Resources Board, to Jared Blumenfeld, Regional Administrator, Region IX, U.S. EPA, dated February 23, 2012.) Because of the State's timely submittal of the certified air quality data, we are basing our final designation decision on 2009-2011 data for these counties.

After considering the State's recommendations and based on EPA's technical analysis described below, EPA is designating Calaveras County (identified in Table 1 below) as "nonattainment" for the 2008 ozone NAAQS as the Calaveras County nonattainment area and Amador County as "unclassifiable/attainment."

Table 1. State’s Recommended and EPA’s 2008 ozone NAAQS Nonattainment Counties or Areas of Indian country for Calaveras County.

Central Mountain Counties	State or Tribe-Recommended Nonattainment Counties or Areas in Indian Country	EPA’s Designated Nonattainment Counties or Areas of Indian Country
Calaveras County, CA	Calaveras County	Calaveras County
No areas of Indian country in the nonattainment area		

Factor Assessment

Factor 1: Air Quality Data

For this factor, we considered 8-hour ozone design values for air quality monitors in the existing Central Mountain Counties nonattainment area, based on data from the most recent three-year period for which we had timely submitted certified air quality data. For Amador and Calaveras counties, the state of California submitted certified air quality data for 2011 before February 29, 2012; thus, for purposes of the final designations, we are considering air quality data from the 2009-2011 period (i.e., the 2011 DV). A monitor’s DV is the metric or statistic that indicates whether that monitor attains a specified air quality standard. The 2008 ozone NAAQS are met at a monitor when the annual fourth-highest daily maximum 8-hour average concentration, averaged over 3 years, is 0.075 parts per million (ppm) (75 parts per billion (ppb)) or less. A DV is only valid if minimum data completeness criteria are met. See 40 CFR part 50 Appendix P. Where several monitors are located in a county (or a designated nonattainment area or maintenance area), the DV for the county or area is determined by the monitor with the highest level.

[Note: Monitors that are eligible for providing design value data generally include State and Local Air Monitoring Stations (SLAMS) that are sited in accordance with 40 CFR Part 58, Appendix D (Section 4.1) and operating with a federal reference method (FRM) or federal equivalent method (FEM) monitor that meets the requirements of 40 CFR part 58, Appendix A. All data from a special purpose monitor (SPM) using an FRM or FEM which has operated for more than 24 months is eligible for comparison to the NAAQS unless the monitoring agency demonstrates that the data came from a particular period during which the requirements of Appendix A (quality assurance requirements) or Appendix E (probe and monitoring path siting criteria) were not met.]

Certified, quality assured data are available in EPA’s Air Quality System (AQS) for all areas through calendar year 2010. California’s ozone season encompasses the entire year. Preliminary, non-certified data from calendar year 2011 is available in AQS for most areas. States are required to certify and quality assure data by May 1st of the following year. California Air Resources Board (ARB) certified 2011 data by February 29, 2012 for Amador and Calaveras counties. EPA’s designation for this area is therefore based on 2009-2011 data. As shown in Table 2, air quality data from 2009-2011 data indicate that Amador County is attaining the 2008 ozone NAAQS (DV is 71 ppb) and Calaveras County is violating the 2008 ozone NAAQS (DV is 77 ppb). Amador County’s 2010 DV was 81 ppb and Calaveras County’s 2010 DV was 83 ppb. Ozone monitors relevant for comparison to the NAAQS and information from additional data sources within the existing Central Mountain Counties nonattainment area are shown in Appendix 1.

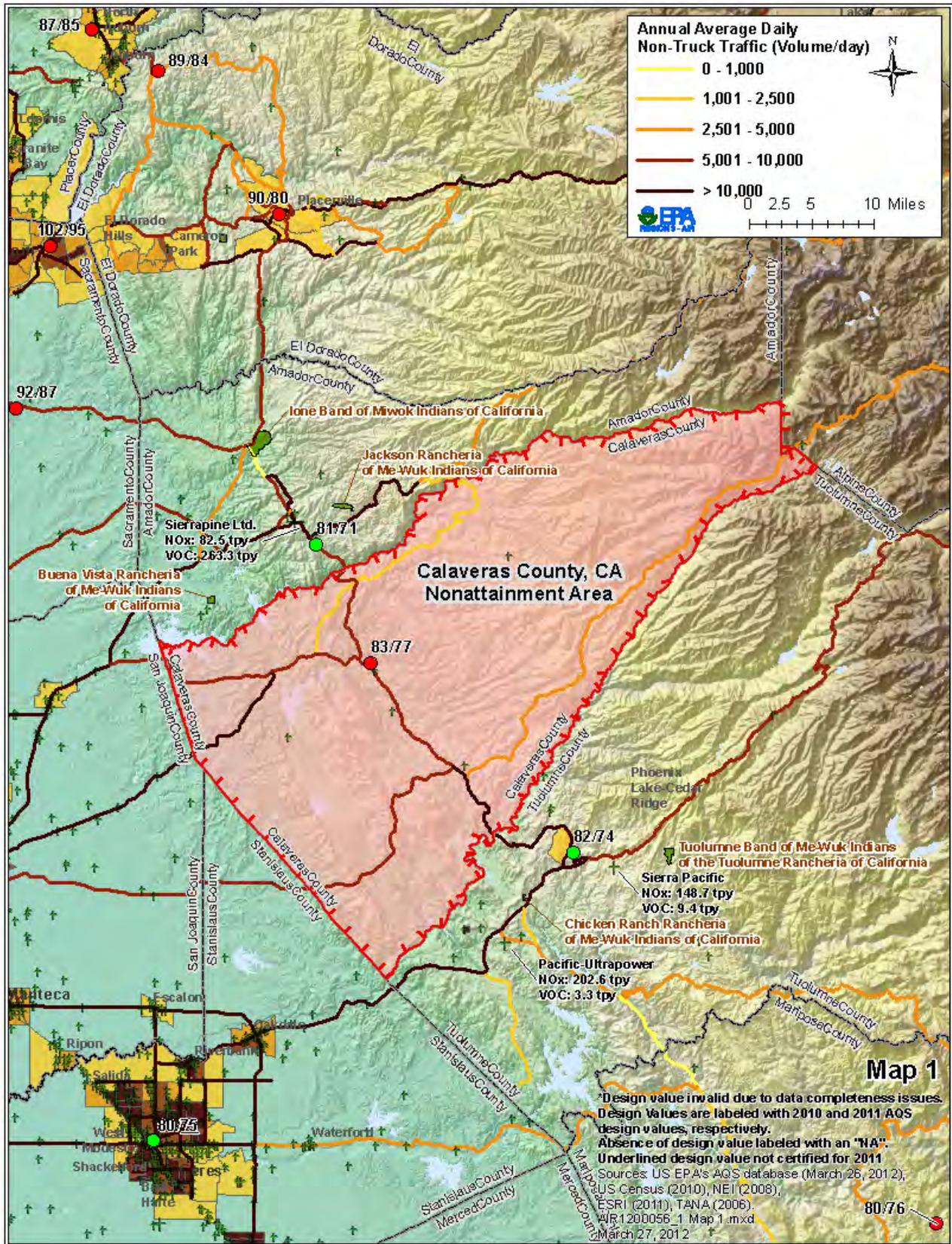
Table 2. Air Quality Data.

County	State Recommended Nonattainment?	2009-2011 Design Value (ppb)
Amador, CA	No	71
Calaveras, CA	Yes	77

Maps contained in Appendix 1 show the geographic distribution of monitors. Maps 1 and 1b show monitor locations for Amador and Calaveras counties. For each monitor, Appendix 1 lists the monitor, the 2008-2010 DV (certified and quality assured in AQS. These were the most recent data available at the time we notified the State of our intended designations) and the 2009-2011 DV (which has been certified and which we are relying on for our final designation decisions for this area). Absence of a DV is symbolized with an “x”.

Appendix 3 lists 2009-2011 DVs for Amador and Calaveras counties. Monitors shown in bold are the DV monitors (i.e., the monitor with the highest DV) for each individual county. Monitors shown in red font are the DV monitor for the nonattainment area. Values with an asterisk do not meet data completeness, and therefore those DVs are not relevant for comparison to the NAAQS and are solely provided for informational purposes.

Based on 2009-2011 data, the monitor in Calaveras County is violating the 2008 standard while the monitor in Amador County is attaining. A county (or partial county) must also be designated nonattainment if it contributes to a violation in a nearby area. Each county without a violating monitor that is located near a county with a violating monitor has been evaluated based on the weight of evidence of the five factors to determine whether it contributes to the nearby violation.



From Appendix 1, Map 1: For map legend describing monitors, emissions, traffic, population, and boundaries, see Appendix 1.

Factor 2: Emissions and Emissions-Related Data

EPA evaluated emissions of ozone precursors, nitrogen oxides (NO_x) and volatile organic compounds (VOC), and other emissions-related data that provide information on areas contributing to violating monitors.

Emissions data

EPA evaluated county-level emission data for NO_x and VOC derived from the 2008 National Emissions Inventory (NEI), version 1.5. This is the most recently available NEI. (See <http://www.epa.gov/ttn/chief/net/2008inventory.html>) Table 3 shows emissions of NO_x and VOC (given in tons per year) for violating and nearby counties that we considered for inclusion in the Calaveras County nonattainment area.

Table 3. Total 2008 NO_x and VOC Emissions.

County	State Recommended Nonattainment?	NO _x (tpy)	VOC (tpy)
Amador, CA	No	1,785	2,496
Calaveras, CA	Yes	1,792	3,558
Areawide:		3,578	6,054

Both NO_x and VOC are precursors to formation of ozone in ambient air. Although Calaveras County has slightly higher emissions of VOC than Amador County, the two counties are similar to each other in terms of their emissions of NO_x. Map 1 in Appendix 1 indicates that stationary sources of ozone precursor emissions are mostly located in Amador County, including Sierra Pine Limited, the largest source of VOC in the existing Central Mountain Counties nonattainment area. However, emissions of ozone precursors in the adjacent counties in the Sacramento and San Joaquin valleys bordering Amador and Calaveras counties (Sacramento, San Joaquin, and Stanislaus counties) are significantly greater than emissions from Amador and Calaveras counties. In comparison, emissions of NO_x and VOC in Sacramento County in 2008 were more than 27,000 tpy of NO_x and 21,000 tpy of VOC; in San Joaquin County emissions were more than 32,000 tpy of NO_x and 17,000 tpy of VOC; and in Stanislaus County emissions were more than 15,000 tpy of NO_x and 16,000 tpy of VOC.

Population density and degree of urbanization

EPA evaluated the population and vehicle use characteristics and trends of the area as indicators of the probable location and magnitude of non-point source emissions. These include ozone-creating emissions from on-road and off-road vehicles and engines, consumer products, residential fuel combustion, and consumer services. Areas of dense population or commercial development are an indicator of area source and mobile source NO_x and VOC emissions, which contribute to ozone formation. Rapid population growth or growth in vehicle miles traveled (VMT) (see below) in a county on the urban perimeter signifies increasing integration with the core urban area, and indicates that it may be appropriate to include the area associated with area source and mobile source emissions as part of the nonattainment area. Table 4 shows the population, population density, and population growth information for each county in the area.

Table 4. Population and Growth.

County	State Recommended Nonattainment?	2010 Population	2010 Population Density (1000 pop/sq mi)	Absolute change in population (2000-2010)	Population % change (2000-2010)
Amador, CA	No	38,091	0.06	2,916	+8%
Calaveras, CA	Yes	45,578	0.04	4,880	+12%
Areawide:		83,669	0.05	7,796	+10%

Sources: U.S. Census Bureau population estimates for 2010 as of August 4, 2011

(http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_PL_GCTPL2.STO5&prodType=table)

Maps 1 and 1a in Appendices 1 and 2, respectively, show population for the area. The small populations and low population densities of Amador and Calaveras counties show that this area is sparsely populated. Although the population of Calaveras County is larger than Amador County, the population density of Amador County is greater than Calaveras County because Calaveras County encompasses a larger land area than Amador County. Additionally, Map 1a shows that Amador County contains a population center surrounding Jackson Rancheria, whereas Calaveras County contains no discrete population centers. For ozone, population is an indicator of ozone precursor emissions. During the period from 2000 to 2010, both counties showed population growth, with slightly larger growth, both in terms of absolute change and percent change, in Calaveras County.

Traffic (VMT) data

EPA evaluated the commuting patterns of residents in the area, as well as the total VMT for each county. In combination with the population/population density data and the location of main transportation arteries (see above), this information helps identify the probable location of non-point source emissions. A county with high VMT is generally an integral part of an urban area and indicates the presence of motor vehicle emissions that may contribute to ozone formation and nonattainment in the area. Rapid population or VMT growth in a county on the urban perimeter signifies increasing integration with the core urban area, and indicates that the associated area source and mobile source emissions may be appropriate to include in the nonattainment area. Table 5 shows total 2008 VMT.

Table 5. Traffic (VMT) data.

County	State Recommended Nonattainment?	2008 VMT* (million miles)
Amador, CA	No	640
Calaveras, CA	Yes	747
Areawide:		1,387

*MOBILE model VMTs are those inputs into the NEI version 1.5.

Total VMT in Amador and Calaveras counties are similar. Calaveras County has a slightly higher VMT, which may be associated with the larger land area in the county. Maps 1 and 1b in Appendix 1 show annual average daily non-truck and truck traffic volumes. Heavy non-truck traffic occurs on roads that run north-south and link Amador and Calaveras counties, as well as east-west roads that link these two counties with San Joaquin and Stanislaus counties. The heaviest truck traffic occurs on Highway 88 that links Amador County with San Joaquin County. Truck and non-truck traffic is lightest on roads that link Amador and Calaveras counties with El Dorado and Alpine counties to the east.

Factor 3: Meteorology (weather/transport patterns)

EPA evaluated available meteorological data to help determine how meteorological conditions, such as weather, transport patterns and stagnation, would affect the fate and transport of precursor emissions contributing to ozone formation.

Amador and Calaveras counties are the center counties of the “Mountain Counties Air Basin” as defined by ARB¹. Summers are generally fairly warm and dry, but there can be periods of quite cool weather. Depending on the meteorological station, in summer months, normal low temperatures range from 46 to 60 degrees Fahrenheit (8 to 16 degrees Celsius), and normal highs range from 74 to 96 degrees F (23 to 35 degrees C). Winds are generally daytime upslope and nighttime downslope flows, caused by the differential heating or cooling of air near mountain ground surfaces relative to air at the same height over land at lower elevations. Such flows follow the east-northeast and west-southwest orientation of the river valleys, described under Factor 4. This is generally consistent with the south-southwest flow in Amador and Calaveras counties seen in the 30-year average direction frequencies computed by EPA, as shown in the “radar”-style wind rose diagram below (see Figure 2). However, it should be noted that this diagram combines flows from multiple meteorological stations, from parts of the counties that do not have the same valley orientation.

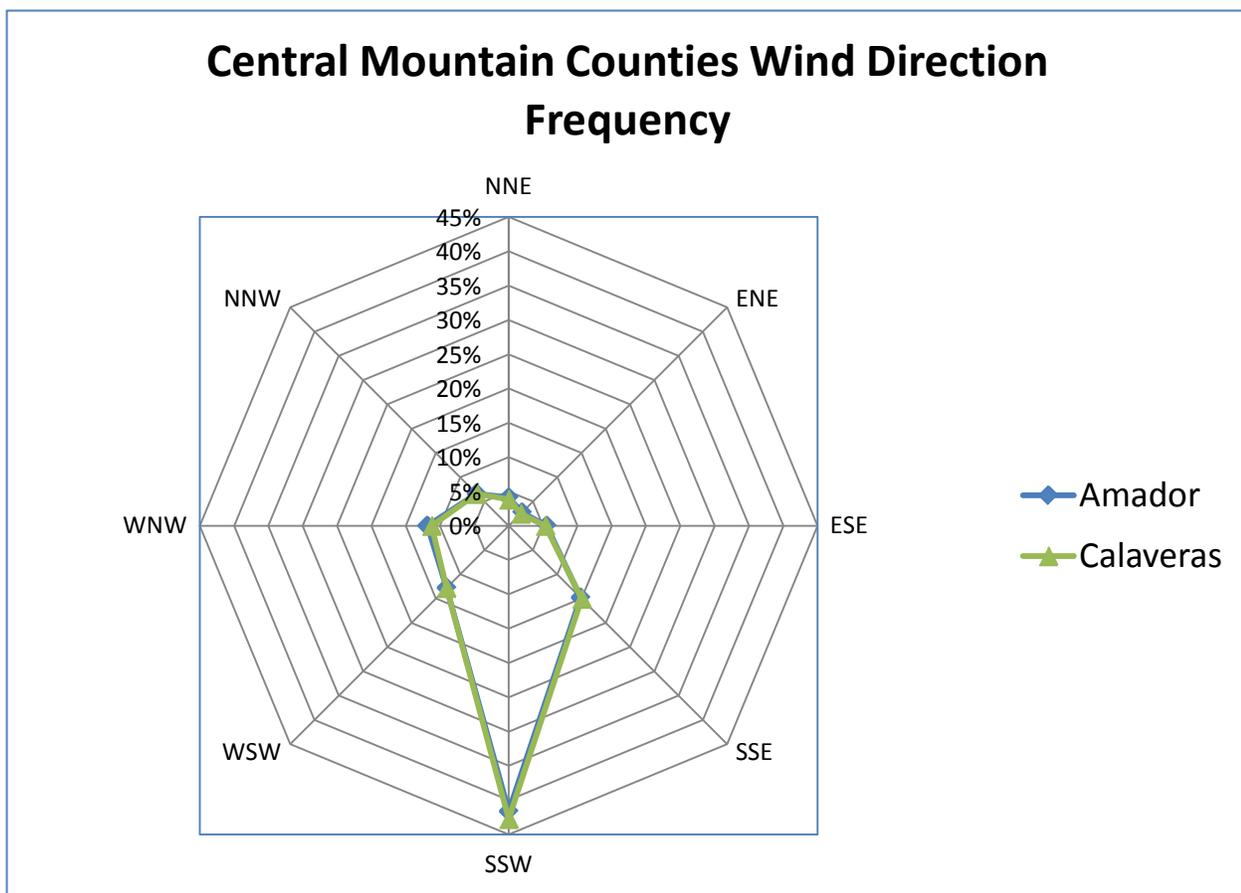


Figure 2

¹ <http://www.arb.ca.gov/ei/maps/statemap/abmap.htm>

Neighboring San Joaquin Valley can have temperature inversions from 2,000 to 2,500 feet (600 to 750 meters) above the valley floor, or even as high as 5,000 feet (1,500 meters). Ozone produced in the San Joaquin Valley and trapped under this inversion can reach fairly high into the mountain counties, or be advected there by daytime upslope flows. Previous assessments of transport by ARB² have found a strong potential for ozone transport from the Sacramento and San Joaquin valleys up into the mountain counties. Nighttime drainage flows reverse this, so some of this pollution, in combination with pollution generated in the mountain counties themselves, could be transported back into the valley, with the potential for some carryover into subsequent days. EPA is designating both the Sacramento Metro area and San Joaquin Valley as their own nonattainment areas for the 2008 ozone NAAQS.

North-south flow between Amador and Calaveras counties is possible as there are fewer barriers to this transport pattern due to the weaker topographic relief in the western parts of both counties. There is likely some transport of pollutants between these two counties, as well as transport from the Sacramento and San Joaquin nonattainment areas. Additionally, EPA notes that 2011 was anomalously cool, potentially creating localized ozone patterns that are not representative of expected normal conditions or ongoing trends.

Factor 4: Geography/topography (mountain ranges or other air basin boundaries)

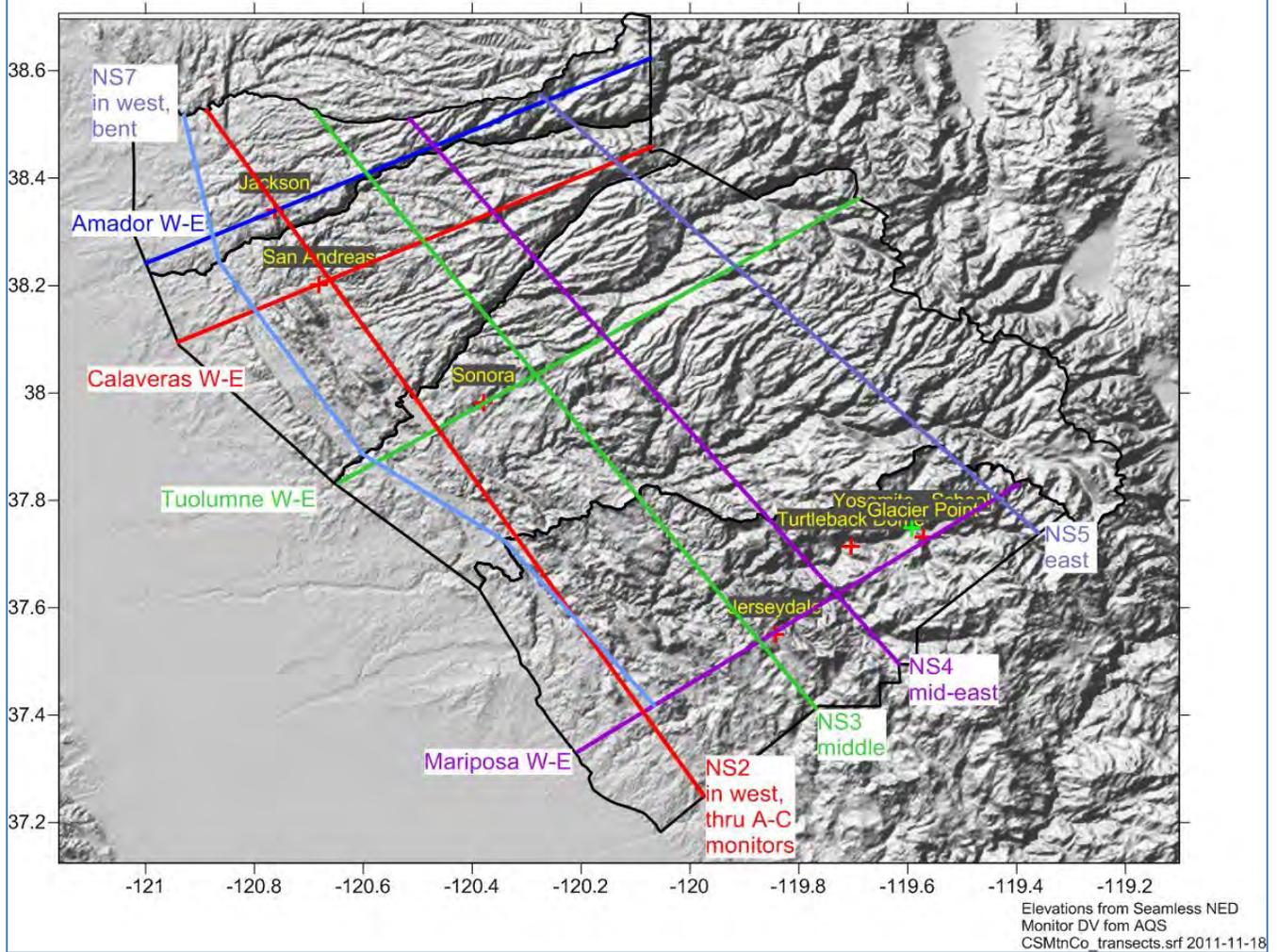
The geography/topography analysis evaluates the physical features of the land that might affect the airshed and, therefore, the distribution of ozone over the area.

Amador and Calaveras counties are the center counties of the “Mountain Counties Air Basin” as defined by ARB. This is not a “basin” in the sense of a single watershed or an area that is more or less surrounded by high terrain. Rather they are rural and largely mountainous counties that are similar in their better air quality, more pronounced topography, and rural character as compared to the more polluted, flatter, and more populous areas to the west (the broad Sacramento and San Joaquin valleys of central California). Both counties are in the foothills and mountains of the Sierra Nevada mountain range. Elevations increase from about 100 feet (24 meters) above mean sea level (MSL) in the west to over 8,000 feet (2,500 meters) in the east. The counties are characterized by rivers running roughly east-northeast to west-southwest, separated by mountains. The largest rivers are the Mokelumne River along the Amador-Calaveras border, the Calaveras River within Calaveras County, and the Stanislaus River along the southern boundary of Calaveras County. These rivers and their various forks and tributaries divide the counties into deep valleys. The strong relief of the terrain may be seen in Appendix 1, Map 1.

The eastern and western portions of the counties are different. The variation of elevation along a 20 kilometer (km) north-south transect is 500 meters and more in the east, decreasing to about 100 - 200 meters in the west. In the west, there are even some valleys with relatively low ridges oriented northwest-southeast, such as Gopher Ridge; these are roughly perpendicular to the orientation of the valleys in the east. Thus, in the eastern portion, the mountains separating the valleys pose a strong barrier to south-north air flow, but in the eastern portion the topography is only a partial barrier to the south-north transport of air, and thus to transport of pollution between the two counties (see Figures 3 - 5).

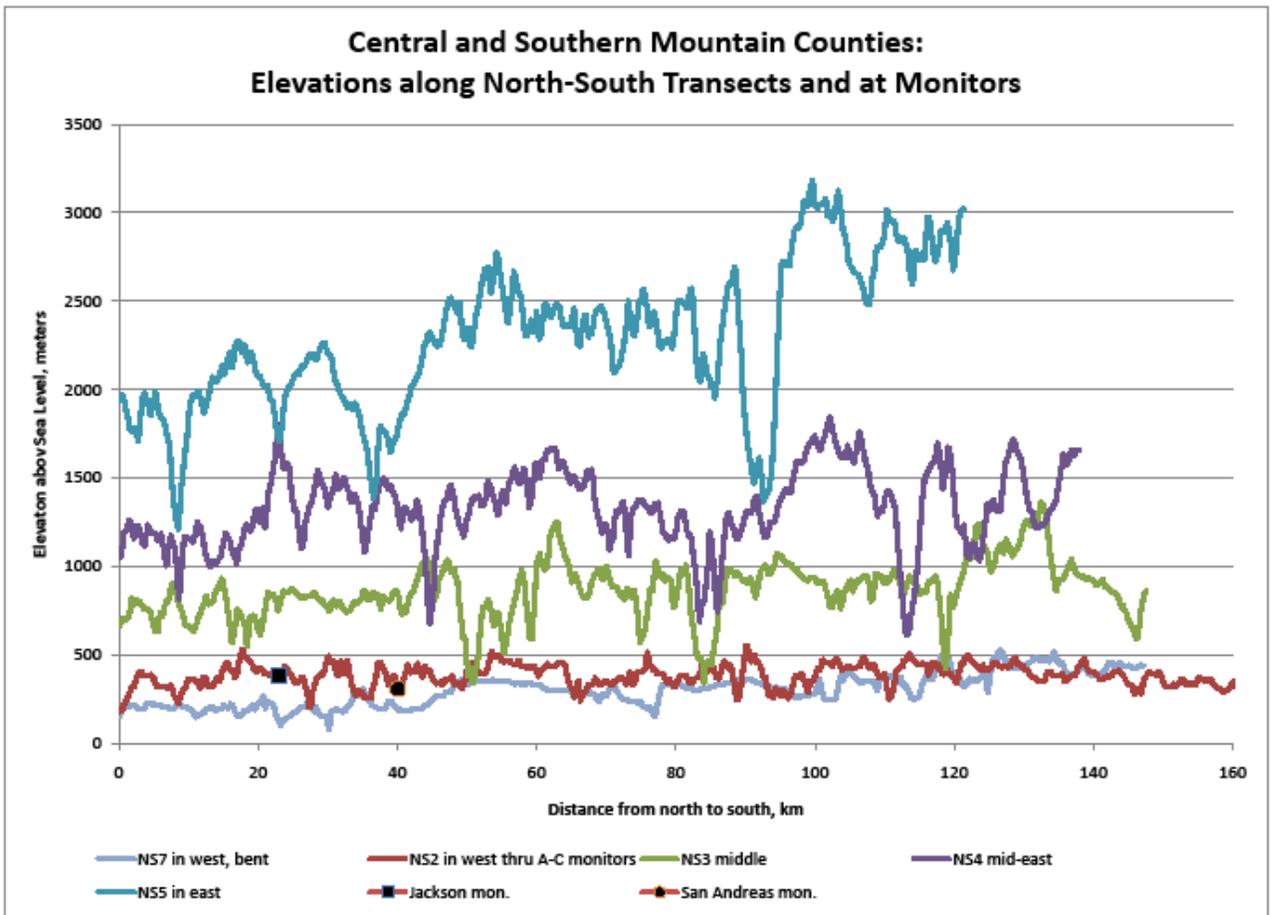
² “Assessment of the Impacts of Transported Pollutants on Ozone Concentrations in California”. California Environmental Protection Agency, Air Resources Board, March 2001. <http://www.arb.ca.gov/aqd/transport/assessments/assessments.htm>

Central and Southern Mountain Counties North-South and West-East Transects and O3 Monitors



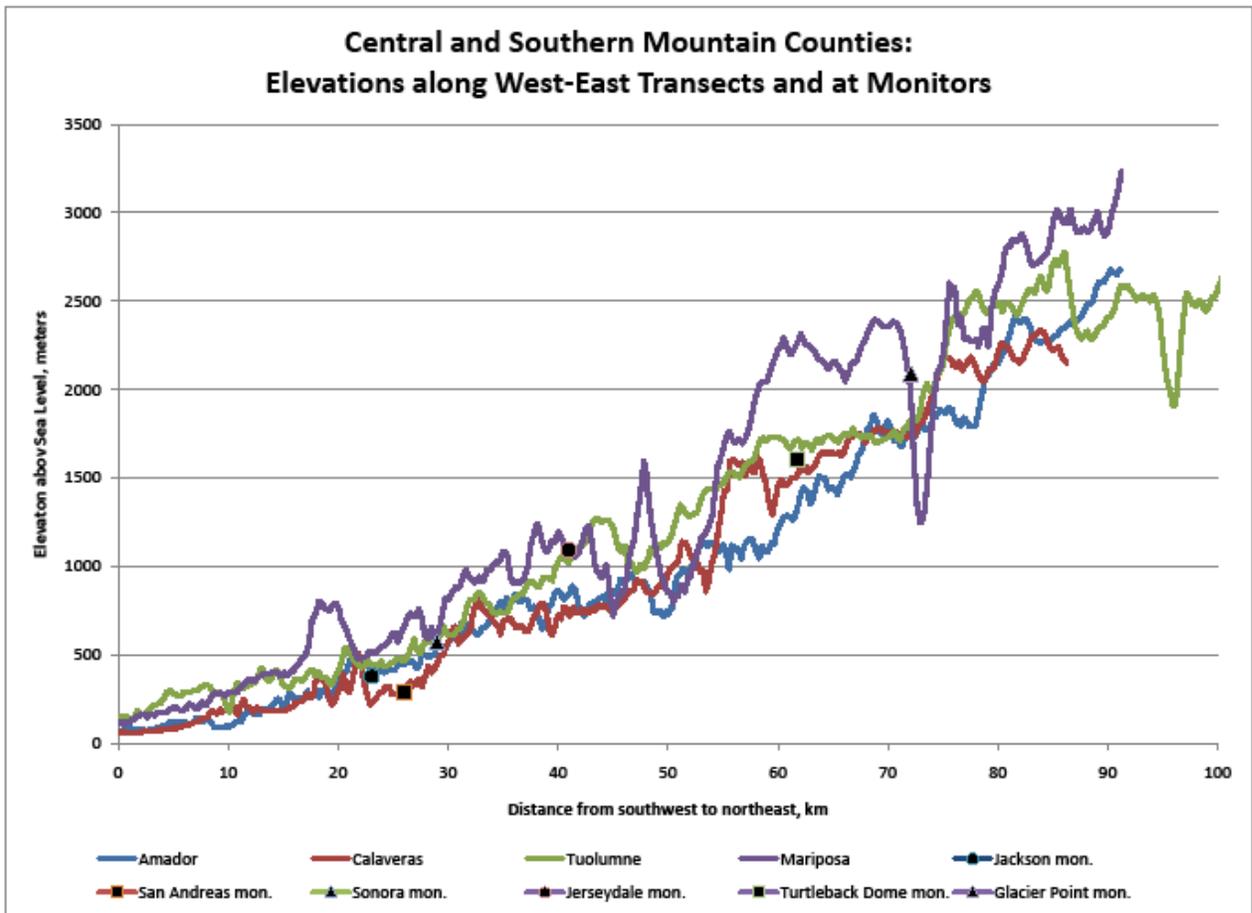
2011 DVs: Jackson-Clinton Road (Amador County): 71; San Andreas-Gold Strike Road (Calaveras County): 77; Sonora-Barretta Street (Tuolumne County): 74; Jerseydale (Mariposa County): 76; Yosemite National Park-Turtleback Dome (Mariposa County, CASTNET monitor): 77; Yosemite National Park-Glacier Point (Mariposa County, National Park Service monitor/non-regulatory): 72*. * = DV does not meet data completeness requirements.

Figure 3



* 2011 DVs: Jackson-Clinton Road (Amador County): 71; San Andreas-Gold Strike Road (Calaveras County): 77.

Figure 4



2011 DVs: Jackson-Clinton Road (Amador County): 71; San Andreas-Gold Strike Road (Calaveras County): 77; Sonora-Barretta Street (Tuolumne County): 74; Jerseydale (Mariposa County): 76; Yosemite National Park-Turtleback Dome (Mariposa County, CASTNET monitor): 77; Yosemite National Park-Glacier Point (Mariposa County, National Park Service monitor/non-regulatory): 72*. * = DV does not meet data completeness requirements.

Figure 5

Flow in the west-east direction is relatively unimpeded along the river valleys, which extend well east into the interior of the counties. Eastward transport of pollutants from the more urbanized areas to the west is thus possible during conditions of upslope flow. Conversely, westward transport of locally generated pollution is possible.

Factor 5: Jurisdictional boundaries

For each potential nonattainment area, we considered existing jurisdictional boundaries to provide a clearly defined legal boundary and to help identify the areas appropriate for carrying out the air quality planning and enforcement functions for nonattainment areas. Examples of jurisdictional boundaries include existing/prior nonattainment area boundaries for ozone or other urban-scale pollutants, county lines, air district boundaries, township boundaries, areas covered by a metropolitan planning organization, state lines, Indian country boundaries, and the urban growth boundary. Where existing jurisdictional boundaries were not adequate or appropriate to describe the nonattainment area, other

clearly defined and permanent landmarks or geographic coordinates were considered.

The Central Mountain Counties nonattainment area has previously-established boundaries associated with the 1997 8-hour ozone NAAQS. EPA had proposed in December 2003 that these counties, along with two other violating mountain counties, be designated as part of the San Joaquin Valley nonattainment area for the 1997 ozone standard. EPA believed then, as we still believe, that the strongest contribution to the violations in the mountain counties comes from the San Joaquin Valley. However, the state requested grouping Amador and Calaveras counties as one nonattainment area, citing existing inter-county coordination, similarities in pollution transport paths, and support from the other factors analyzed. EPA accepted the state's recommendations, and in 2004, designated Amador and Calaveras counties as one multi-jurisdictional nonattainment area (Central Mountain Counties). In 2009, the state recommended the same nonattainment area for the 2008 standard. Both counties had violating monitors at the time. Now that certified, quality-assured 2011 data indicate that Amador County is attaining the 2008 ozone NAAQS based on its 2009-2011 DV, the state is requesting that we designate only Calaveras County as nonattainment. This recommendation follows the county and air district boundaries, but deviates from the existing Central Mountain Counties nonattainment area boundary, by excluding Amador County.

Amador and Calaveras counties are not grouped together to form a Core Based Statistical Area (CBSA) or a Combined Statistical Area (CSA). The Amador County boundary is also the boundary for the jurisdiction of the Amador County Air Pollution Control District. Likewise, the Calaveras County boundary is the jurisdictional boundary for the Calaveras County Air Pollution Control District. CARB's February 23, 2012 letter includes an attachment providing the state's justification for excluding Amador County from the nonattainment area under consideration. (See ARB's "Enclosure 1, Information to Support Area Designation Boundary Recommendations for the 2008 Federal 8-Hour Ozone Standard: Amador, Calaveras, Tuolumne, and Mariposa Counties.") The state's justification with respect to jurisdictional boundaries is that, although both Amador and Calaveras counties are in the Mountain Counties Air Basin, as defined by the state, each county has its own air agency:

"Air quality in each county is managed at the local level through land use and development planning practices, and the local APCD [Air Pollution Control District] is responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and State air quality laws. With respect to nonattainment planning, it is most efficient to have the nonattainment boundary coincide with the jurisdictional boundary of the area(s) that experience or contribute to violations of the standard." (Enclosure 1, page 2)

Attainment in the Calaveras County nonattainment area will be affected by reductions in nearby nonattainment areas, including the San Joaquin Valley and Sacramento Metro nonattainment areas. The San Joaquin Valley and Sacramento APCD's will be making emission reductions to achieve attainment with the 2008 ozone NAAQS in their nonattainment areas. As part of nonattainment area planning throughout the state, ARB has and will continue to make reductions to mobile source and consumer product emissions. Air quality planning for Calaveras County will be performed by the Calaveras County APCD.

Conclusion

Based on the assessment of factors described above, EPA has concluded that Calaveras County should be included in the Calaveras County, CA nonattainment area because it is violating the 2008 ozone NAAQS.

The Clean Air Act requires EPA to designate any area as nonattainment if it violates a NAAQS or if it contributes to a violation in a nearby area. Certified air quality data (Factor 1) for 2009-2011 indicate that the monitor in Calaveras County violates the 2008 8-hour ozone standard. The monitor in Amador County indicates that Amador County is attaining the 2008 ozone standard based on 2011 data.

Emissions and emission-related data (Factor 2) show that total emissions of ozone precursors from Amador and Calaveras counties are very small compared to ozone precursor emissions from the counties in the San Joaquin Valley and Sacramento Metro nonattainment areas. Emissions and emission-related data further show, although most of the stationary sources of ozone precursor emissions are located in Amador County, Calaveras County has slightly higher emissions of VOC than Amador County and the two counties have similar levels of NO_x emissions. Additionally, the road that sees the heaviest truck and non-truck traffic is located in Amador County; however, VMT in Calaveras County is higher than Amador County. Calaveras County has a slightly larger population and showed greater population growth over 2000-2010, while Amador has a slightly higher population density.

Meteorology and weather or transport patterns (Factor 3) show that the dominant wind direction, from the south-southwest, is indicative of transport from the San Joaquin Valley nonattainment area, but there may be some transport of pollutants between Amador and Calaveras counties. EPA notes that 2011 was anomalously cool, potentially creating localized ozone patterns that are not representative of expected normal conditions or ongoing trends.

Geography and topography (Factor 4) shows that Amador and Calaveras counties contain complex terrain. Air flow in the west-east direction is relatively unimpeded along the river valleys, which extend well east into the interior of each county. Eastward transport of pollutants from the more urbanized areas to the west such as the Sacramento Metro area is thus possible during conditions of upslope flow. Conversely, westward transport of locally generated pollution is possible.

In considering jurisdictional boundaries (Factor 5), EPA notes that Amador and Calaveras counties were designated nonattainment as the Central Mountain Counties nonattainment area for the 1997 ozone NAAQS in 2004. Now that certified and quality-assured 2011 data indicate that Amador is attaining the NAAQS, the state is requesting that we designate only Calaveras County as nonattainment and that we designate Amador County as attainment for the 2008 standard. The state's multi-factor analysis highlights that Amador and Calaveras are separate air pollution control districts with separate jurisdictional boards and authorities.

The Clean Air Act requires EPA to designate any area as nonattainment if it violates a NAAQS or if it contributes to a violation in a nearby area. The violating monitor is in Calaveras County. Our analysis of the Meteorology and Geography factors suggest that occasional transport of ozone and/or ozone precursors between Amador and Calaveras counties is possible. However, EPA cannot conclusively determine that Amador County contributes to nonattainment in Calaveras County. The relatively low ozone precursor emissions from both counties compared to the counties in the San Joaquin Valley and

Sacramento Metro nonattainment areas, along with the region's meteorology and geography is most suggestive that the violations in Calaveras are attributable primarily to contributions from the broader valley areas. Also, Calaveras County is a separate jurisdictional air pollution district. Therefore, EPA is concluding that it is appropriate to designate only Calaveras County, CA as nonattainment for the 2008 ozone NAAQS. The San Joaquin Valley and Sacramento Metro areas are separately designated as “nonattainment.”