

AIR POLLUTION CONTROL DISTRICT  
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic:     Curtailement and/or Episode Events    

Distribution:     All Policy Holders    

This policy and procedures document provides guidance to project managers when a curtailment and/or episode event occurs. A curtailment event can occur only during the construction phase of a project, while an episode event is a post-construction/production phase phenomena.

CURTAILMENT EVENTS

An ATC permit condition may require the submission and implementation of a construction Curtailement Plan because the Air Quality Impact Analysis has shown that standard violations may occur during construction. The project manager must verify that the plan has been submitted and approved prior to the commencement of construction. The Ambient Monitoring Section must be informed of the curtailment requirement and, in particular, the curtailment concentrations and the monitoring station(s) used to trigger the curtailment. To this end, a copy of the Curtailement Plan should be provided to the Monitoring Section. Coordination with the Monitoring Section is crucial, as the Monitoring personnel will inform the project manager whether or not the curtailment concentrations have been reached. If curtailment is required, the project manager must inform the source immediately by phone or in person. This verbal warning shall be followed by a letter faxed or hand-delivered to the source's contact person. The project manager must also verify, via on-site inspection, that the required actions have been implemented. When ambient concentrations have dropped below the trigger concentrations, Monitoring personnel will inform the project manager who shall in turn inform the source of the cessation of curtailment.

EPISODE EVENTS

District Regulation VI (Emergencies) requires all major stationary sources to submit and implement Episode Plans. Additionally, sources which operate 50 or more fleet vehicles or employ more than 100 persons per shift are required to submit and implement Traffic Abatement Plans. Regulation VI also specifies the contents of such plans (Rule 603.A and 603.B), the District approval period (Rule 603.D) and the inspection of sources during second and third-stage alerts (Rule 604).

The project manager can determine whether his/her project is subject to Regulation VI by referring to the "Regulatory Review" section of the ATC (generally Section 3.0). If the project is subject to Regulation VI, the project manager should ascertain whether the Episode/Traffic

Abatement Plan has been submitted and approved. When an episode has been declared by the Air Pollution Control Officer, the project manager will be informed by the Ambient Monitoring Section. The project manager will in turn inform the source, while Ambient Monitoring Section will inform the news media, public safety agencies and health care facilities. If a second or third-stage alert has been declared, the project manager (or the inspector assigned to the project) must inspect the source to ascertain that all mandatory actions have been taken pursuant to the source's District-approved plan(s). When the episode event has ended, Monitoring personnel will inform the project manager who will in turn inform the source. If the episode event ends on a holiday or weekend, the Ambient Monitoring staff will inform the source. Project managers must provide the Monitoring staff with a contact person at the source and their 24-hour phone number in order for the Monitoring staff to be able to inform the source. Additionally, pursuant to Rule 603.A.2.n. and Rule 603.B.2.m, reports on the effectiveness of the plan(s) should be requested from the source.