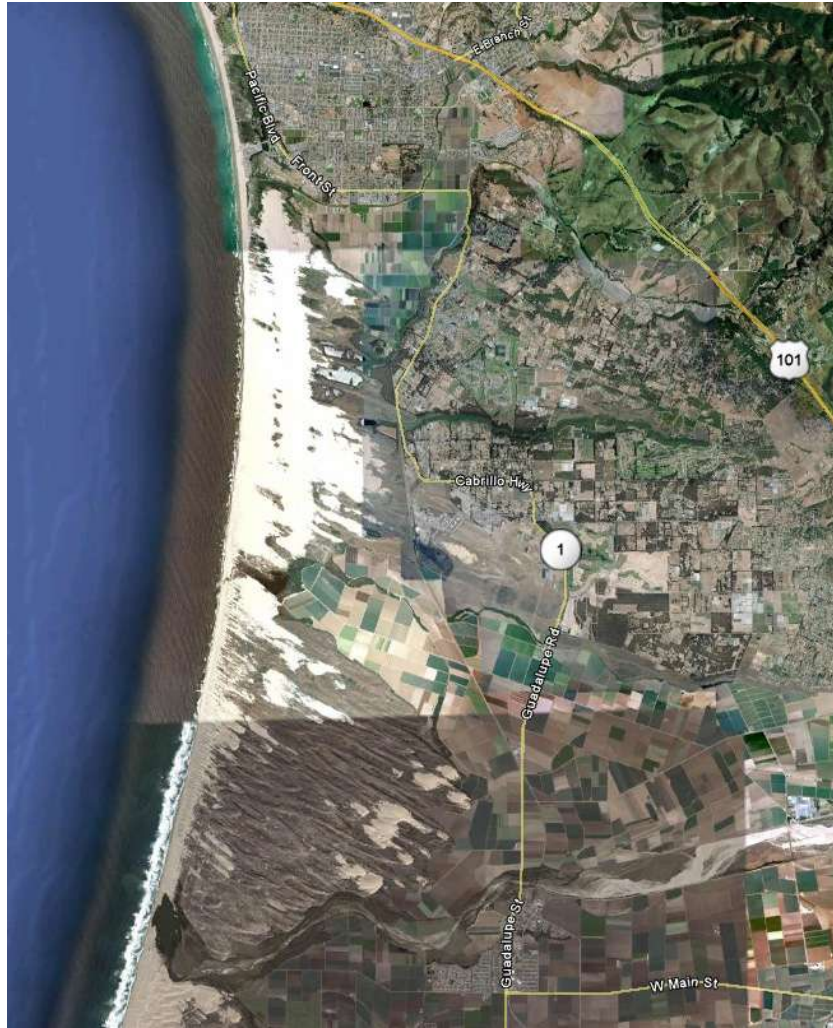


SOUTH COUNTY PHASE 2 PARTICULATE STUDY

San Luis Obispo County Air Pollution Control District

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EXECUTIVE SUMMARY

Historical ambient air monitoring on the Nipomo Mesa has documented atypical concentrations of airborne particulate matter compared to other areas of San Luis Obispo County and other coastal areas of California. These historical measurements show that the California health standard for PM₁₀ (airborne particles with a mean aerodynamic diameter of 10 microns or less) is regularly exceeded in many locations on the Nipomo Mesa. Population-based studies in hundreds of cities in the U.S. and around the world have demonstrated that both short-term and long-term exposure to elevated particulate levels can cause significant increases in hospital admissions, emergency room visits, asthma attacks and premature deaths. Groundbreaking long-term studies of children's health conducted in California have also shown that particle pollution may significantly reduce lung function growth in children.

To better understand the extent and sources of these unusually high concentrations of particulate pollution on the Nipomo Mesa, the San Luis Obispo County Air Pollution Control District (SLO APCD) has conducted comprehensive air monitoring studies in that region. The Phase 1 South County Particulate Matter (PM) Study began in 2004 and utilized filter-based manual particulate samplers measuring both PM₁₀ and PM_{2.5} (particles 2.5 microns in diameter or less) concentrations at 6 monitoring sites located throughout the Mesa. Samples were collected over a one year period and analyzed for mass and elemental composition; meteorological measurements of wind speed and direction were also performed at numerous locations in the study area.

Data from the Phase 1 study showed air quality on the Nipomo Mesa exceeds the state 24-hour PM₁₀ health standard at one or more monitoring locations on over one quarter of the sample days. Elemental analysis of PM_{2.5} filter samples demonstrated that on these high particulate days, the largest fraction of particles are composed of the wind blown crustal material containing silicon, iron, aluminum, and calcium. Meteorological data showed that high wind events entraining crustal particulate from the dune fields at the Oceano Dunes State Recreational Vehicle Area (SRVA) upwind of the Nipomo Mesa area and transporting them inland as the likely cause; data from a directional PM₁₀ sampler on the Mesa that only operated on high wind days strongly supported this conclusion. Further analysis of Phase 1 study data was unable to provide a conclusive determination on whether off-road vehicle (OHV) activity in the SVRA played a role, either direct or indirect, in the particulate pollution observed on the Nipomo Mesa.

The Phase 1 Study Report was presented to the SLO APCD Board of Directors in March of 2007. The Board directed staff to design and conduct a follow-up study with the primary goal of determining if OHV activity on the SVRA played a role in the high particulate levels measured on the Nipomo Mesa; a secondary goal of the study was to determine what, if any, particulate impacts on the Mesa are due to fugitive dust from the petroleum coke piles at the ConocoPhillips Refinery complex. To help design and conduct the Phase 2 study, the SLO APCD retained the services of the Delta Group, an affiliation of scientists, mostly from the University of California at Davis (UCD), dedicated to the detection and evaluation of aerosol transport. The Great Basin Unified Air Pollution Control District (GBUAPCD), a recognized leader nationwide in understanding and mitigating wind blown particulate pollution, also lent their considerable expertise to the design and implementation of the study. Scientists from the Santa Barbara County APCD, the California Air Resources Board (CARB) and the California State Parks Department also provided significant input in the design phase of the study.

The Phase 2 Study design involved three independent investigations using a broad array of technologies and measurement techniques to better understand the source(s) and activities responsible for the observed particulate pollution problem on the Nipomo Mesa. Determining the role of OHV activity on the SVRA was a key focus of the study, so it was important to conduct measurements and analyses both within and downwind of the dunes at the SVRA, as well within and downwind of “control site” dunes north and south of the SVRA where offroad vehicles are not allowed, to evaluate the differences between them. PM and meteorological measurements downwind of the refinery coke piles and agricultural fields on the Mesa were also a necessary design element to determine potential contributions from those areas. Further, since the Phase 1 study showed that high PM concentrations on the Mesa occur primarily on high wind days, it was critical to ensure that study measurements captured the high wind events that typically occur during the early spring and late fall months.

The field measurement phase of the study was conducted from January 2008 through March 2009. The portion of the study performed by the SLO APCD entailed the deployment and use of real-time particulate monitors and wind sensors at a variety of locations downwind of both the SVRA and the control sites, as well as downwind of the coke piles and agricultural fields. These measurements were designed to assess the relative levels of airborne particulate coming from those areas, particularly on high wind days.

The portion of the study directed by the GBUAPCD involved measuring the amount of sand movement at different wind speeds, both in the SVRA and a control site, to better understand the mechanism and potential source location responsible for wind blown emissions. The Delta Group was responsible for deploying and operating sophisticated research sampling instruments designed to measure the mass, size distribution and elemental composition of the particulate pollution. These samplers were located downwind from the SVRA and a number of control sites that currently do not allow OHV activity. The samplers were also used to look for tracer elements to assess if petroleum coke from the ConocoPhillips refinery facility was being entrained by winds and impacting ambient PM levels in the area. The Delta Group also collected and analyzed soil samples upwind from each monitoring station.

The 3-pronged field investigation effort for the Phase 2 study gathered well over two million data points, requiring nearly a year to review, validate and analyze the data and compile the results. The data analysis was performed by the three independent research groups involved in designing and implementing the study, followed by peer review of the draft study report by a diverse and respected group of scientists with expertise in this field. This wealth of data and critical review of the results by numerous independent experts, combined with the results from the Phase 1 study, provides a much more complete understanding of the particulate pollution problem in the area, leading to the following major findings:

- The airborne particulate matter predominantly impacting the region on high episode days does not originate from an offshore source.
- Neither the petroleum coke piles at the ConocoPhillips facility nor agricultural fields or activities in and around the area are a significant source of ambient PM on the Nipomo Mesa.
- The airborne particulate matter impacting the Nipomo Mesa on high episode days predominantly consists of fine sand material transported to the Mesa from upwind areas under high wind conditions.

- The primary source of high PM levels measured on the Nipomo Mesa is the open sand sheets in the dune areas of the coast.
- The open sand sheets subject to OHV activity on the SVRA emit significantly greater amounts of particulates than the undisturbed sand sheets at the study control sites under the same wind conditions.
- Vegetated dune areas do not emit wind blown particles; the control site dunes have significantly higher vegetation coverage than is present at the SVRA.

The major findings resulting from detailed analysis of the diverse and comprehensive data sets generated during the Phase 1 and Phase 2 South County PM Studies clearly lead to a definitive conclusion: OHV activity in the SVRA is a major contributing factor to the high PM concentrations observed on the Nipomo Mesa.

There are two potential mechanisms of OHV impact. The first is direct emissions from the vehicles themselves, which includes fuel combustion exhaust and/or dust raised by vehicles moving over the sand. Elemental analysis of study data shows combustion exhaust particles are not a significant component in the samples during high concentration periods. However, analysis of SVRA vehicle activity data does show a weak relationship between high PM₁₀ concentrations and high vehicle activity. This indicates a very small direct emissions impact from OHV activity caused by wind entrainment of dust plumes raised by vehicles moving across the open sand. While significant, the study data shows this is not the major factor responsible for the high PM levels downwind from the SVRA.

The second potential mechanism of impact from OHV activities involves indirect emission impacts. Offroad vehicle activity on the dunes is known to cause de-vegetation, destabilization of dune structure and destruction of the natural crust on the dune surface. All of these act to increase the ability of winds to entrain sand particles from the dunes and carry them to the Mesa, representing an indirect emissions impact from the vehicles. The data strongly suggests this is the primary cause of the high PM levels measured on the Nipomo Mesa during episode days.

1 INTRODUCTION AND BACKGROUND

Historical ambient air monitoring on the Nipomo Mesa has shown atypical concentrations of airborne particulate matter compared to other areas of San Luis Obispo County and other coastal areas of California (8). A variety of air quality measurements have been made at several locations on the Nipomo Mesa over at least the last two decades. These historical measurements show that the California health standard for PM₁₀ (airborne particles with a mean aerodynamic diameter of 10 microns or less) is regularly exceeded in many locations on the Mesa (6).

To better understand the extent and sources of these unusually high concentrations of particulate pollution, the San Luis Obispo County Air Pollution Control District (SLO APCD) has performed numerous air monitoring projects on the Mesa. The most comprehensive study in that area prior to the current effort was performed in 2004. In that study (Phase 1), filter-based manual particulate samplers measuring both PM₁₀ and PM_{2.5} (particles with a 2.5 micron diameter or less) were utilized to collect samples from 6 monitoring stations on the Nipomo Mesa over a one year period; the samples were then analyzed for mass and elemental composition.

The results of the Phase 1 study documented the extent and severity of the particulate pollution problem on the Nipomo Mesa. Data from this study showed exceedances of the state 24-hour PM₁₀ health standard at one or more monitoring sites on the Mesa on more than one quarter of the sample days. Five of the six state and federal particulate health standards were exceeded over the study period. Elemental analysis of the particulate samples showed that on high concentration days, the majority of the particle mass consisted of earth crustal elements, along with 5 to 10 % sea salt, about 5% ammonium sulfate and less than 1% ammonium nitrate (6).

Review of the study data demonstrated a strong correlation between high PM concentrations and high winds. A directional PM₁₀ sampler was installed at a monitoring site located at the CDF fire station on the Mesa; it was designed to measure particles only when the wind was blowing from the direction of the dunes upwind from the monitoring site, as compared to the other nearby samplers which measured particulates from all directions. Figure 1.1 presents this data, clearly demonstrating that the majority of the mass captured on high concentration days originated in the direction of the upwind dunes.

The non-dune related PM levels measured with the directional sampler (shown in red) at CDF are similar to levels found at other monitoring locations on the central coast, as shown in Figure 1.2. This chart presents the 24-hour average PM₁₀ levels measured at the Morro Bay monitoring station during the Phase 1 study, and are typical for the Central Coast (8). Comparing the data from the CDF site to the Morro Bay site demonstrates how atypical the PM₁₀ measurements on the Nipomo Mesa are for this region. The comprehensive Phase 1 monitoring study documented a PM concentration gradient that peaked near the coastal sites and declined at sites located further inland. Localized contributions appeared to be minimal, with the exception of one site located near a dirt road.

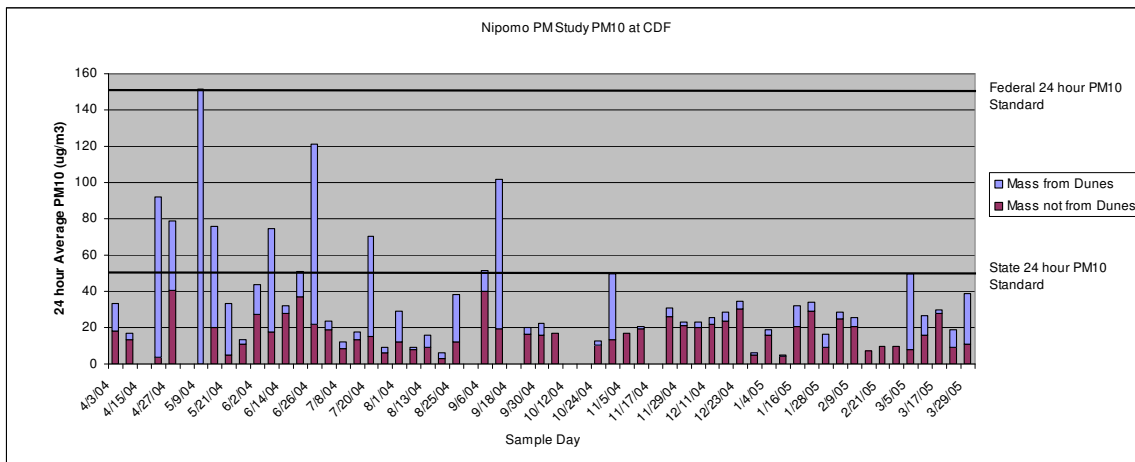


Figure 1.1 – Directional Sampler PM₁₀ Measurements at CDF (Phase 1 Study)

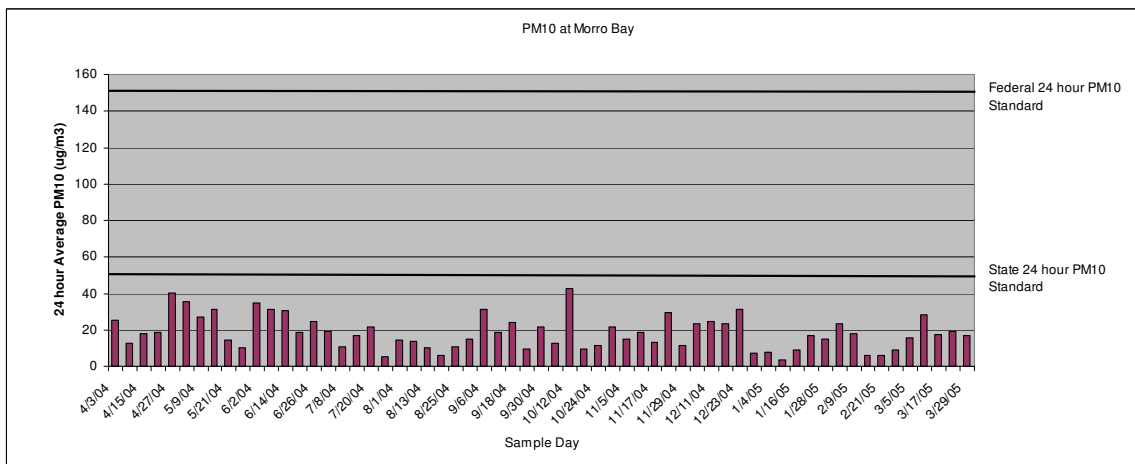


Figure 1.2 - PM₁₀ Measurements at Morro Bay (Phase 1 Study)

Data from the Phase 1 study as well as historical data were used to investigate the relationship between off-road vehicle activity at the Oceano Dunes State Vehicle Recreation Area (SRVA) located in the dunes upwind from the Nipomo Mesa) and the observed particulate concentrations. That analysis did not yield definitive conclusions on the issue. After the Phase 1 study results were presented to the APCD Board of Directors, they directed staff to perform a second study to determine the specific cause of the high PM₁₀ levels measured on the Nipomo Mesa, including whether or not the off-road activity at the SVRA plays any role in the problem.

To help design and conduct the Phase 2 study, the San Luis Obispo County APCD retained the services of the Delta Group, an affiliation of scientists, mostly from the University of California at Davis (UCD), dedicated to the detection and evaluation of aerosol transport. The Delta Group is led by UCD professors Dr. Thomas Cahill and Dr. David Barnes. Additionally, the APCD retained assistance from the Santa Barbara County APCD, the Great Basin Unified APCD (GBUAPCD), the California Air Resources Board (CARB) and California State Parks.

An additional area of investigation added to the Phase 2 study was whether or not high winds had the potential to entrain and transport petroleum coke particles from the large storage piles located at the ConocoPhillips refinery on the Nipomo Mesa. The Delta Group has developed and

utilized advanced sampling technology that is particularly well suited to the detection of the type of particles found in coke piles.

1.1. Evaluation of Potential Sources of Aerosols

Two factors are vital in the evaluation of potential aerosol sources:

1. The friability and particle size profiles of the materials, which provides an estimate of the nature of the materials that might be suspended into the ambient atmosphere; and
2. The wind shear present on the materials, which is a combination of the strength of the wind and the ground level, the friction velocity, and momentum transfer, modulated by the parameter z_0 that gives the effective wind profile as it approaches the ground. (Seinfeld and Pandis, 1997, pg 873)

Thus, a highly friable soil under a vegetative cover that effectively reduces the wind velocity to zero at and just above the ground may not be emitted into the atmosphere, while a less friable soil exposed to the full wind velocity may be resuspended in the air. The nature of the sources of the materials and the mode of resuspension can be further clarified by classification of source type and mechanisms. Since airborne dust comes from a variety of sources, it helps to break them into categories. Each category has its own characteristics that allow source identification.

Table 1.1 Characterization of Ambient Dust Sources

| Source of Materials | Categories of Airborne Dust | |
|--------------------------------------|-----------------------------|--------------------------------|
| | Caused by Wind | Caused by Man's Activities |
| Natural – unmodified by humans | 1: Natural background | 2: Resuspended dust |
| Man made – tailing piles, dirt roads | 3: Fugitive dust | 4: Primary pollutant emissions |

Categories 1 and 4 in Table 1.1 above are the easiest to identify, but the second and third are the most important.

The first, **natural background** represents unmodified soil surfaces eroded by natural winds. Since soils over time protect themselves with physical and biological crusts, vegetation, and the like, these dusts are usually low in concentration except in high wind events (Saharan dust storms, some Chinese storms, etc.). Exceptions may occur for dry lake playas and vegetative free beach zones.

The fourth, **primary pollutant emissions** are also easy to identify as both the particle size and composition are different from natural dusts. In many cases, the source itself is known or suspected such as a tall stack at an industrial facility, a cement plant, or in this case, motor vehicles and the ConocoPhillips refinery.

The second, **resuspended dust**, represents a natural material that has become airborne through human activity. Examples include vehicles traveling on unpaved roads, construction equipment clearing a site, and farming operations. While the resulting airborne particles may be chemically the same as natural background, human activities may modify particle size and its correlation to wind velocity. For example, a farm field stripped of vegetation that can then be picked up by natural winds falls into this category, since chemically the materials are still soil.

The third, **fugitive dust**, is represented by a human created material capable of being picked up and transported by natural winds. Wind-blown dust from industrial tailings piles are a prime example, as these materials are chemically different from natural soils. Roadway dusts are also polluted with metals from brakes, rubber from tire wear and other non-soil compounds. Thus, compositional analysis aids in their identification. In this study, the ConocoPhillips coke piles are a potential source of fugitive dust.

The South County Phase 2 PM Study was designed to examine all four source categories of ambient dust described above and their potential role in contributing to the high particulate levels observed on the Nipomo Mesa. The following chapters describe the study design, monitoring and analyses performed, results obtained and conclusions reached:

| | |
|------------|---|
| Chapter 2: | Study Design |
| Chapter 3: | Ambient PM ₁₀ and Meteorological Measurements and Data Analysis |
| Chapter 4: | Sand Flux Measurements and Data Analysis |
| Chapter 5: | Aerosol and Soil Particle Composition and Size Measurements and Data Analysis |
| Chapter 6: | Major Findings, Summary and Conclusions |
| Chapter 7: | References |

2 STUDY DESIGN

The primary goals of the Phase 2 Particulate Study are as follows:

1. To definitively identify the source(s) of the observed high particulate levels on the Nipomo Mesa, including:
 - a. Assessing if the off-road vehicle activity at the Oceano Dunes State Vehicle Recreational Area significantly impacts downwind particulate concentrations; and,
 - b. Determining what, if any, off-site particulate impacts are due to fugitive dust from the petroleum coke piles at the ConocoPhillips Refinery on the Mesa;
 - c. Assessing if agricultural or other activities in the area significantly impact downwind particulate concentrations.
2. To determine the contribution of direct and/or indirect emissions as causative factors in the PM levels observed.

Accomplishing these goals presents many technical challenges. Demonstrating that a particular activity is responsible for the ambient particulate levels measured in a given area requires a clear linkage between the particles being emitted by the activity and the concentrations being measured at the receptor locations. Demonstrating that a particular activity is not responsible for that impact requires demonstrating the particles are not emitted in the area of the activity, and/or the activity is not causing particulate emissions.

It is important to recognize that there are two distinctly different potential mechanisms by which the off highway vehicle (OHV) activity on the Oceano Dunes might contribute to the observed particulate pollution problem on the Nipomo Mesa. Direct emission impacts from the vehicles themselves, such as fuel combustion exhaust and dust raised by vehicles moving over the sand, are one potential mechanism. Indirect emission impacts can also result from offroad vehicles causing de-vegetation, destabilization of dune structure, destruction of the natural crust on the dune surface, and/or creation of finer sand particles by grinding action of the tires, all of which can increase the ability of winds to entrain sand particles from the dunes and carry them to the Mesa.

To achieve the two primary study goals described above, the study design incorporated a broad array of both of regulatory and research analysis techniques, including:

- Real-time PM monitors used in conjunction with wind measurements to identify source locations.
- Analysis of elemental and particle size distribution using drum samplers to determine the source type and area.
- Measurement of sand movement on the dunes to evaluate its correlation to downwind PM₁₀ concentrations and help define the emission mechanism responsible for the elevated downwind PM₁₀ concentrations. Sample sites included the SVRA and an un-ridden control dune area to calculate the wind speed at which sand movement occurs and the mass of sand movement at a given wind speed, both indicators of susceptibility to wind erosion.
- Comparison of PM₁₀ concentrations downwind from the SVRA and control sites to gauge the PM contribution from areas with different activities.

Utilizing these diverse sampling techniques directed by independent research groups is a key strength of the Phase 2 study design, making it much more comprehensive and objective than a study performed by a single group using a single analysis method. Each research group is composed of professionals and scientists recognized as experts in their field and in the sampling techniques they employed. Table 2.1 below lists the three areas of investigation, the responsibilities of each group and their sampling methods.

Table 2.1 - Group Responsibilities in Phase 2 Study

| Group | SLO APCD | Delta Group | GBUAPCD/CARB |
|-------------------------|---|---|--|
| Responsibility | <i>Ambient PM levels & meteorology measurements</i> | <i>Elemental composition & size distribution of particles</i> | <i>Sand movement (flux) in potential source areas</i> |
| Sampling Methods | US EPA-approved continuous tapered element oscillating microbalance (TEOM); non-EPA approved beta attenuation monitor; EPA-approved manual gravimetric particulate samplers; continuous wind speed, wind direction and temperature measurements | Customized drum samplers for elemental composition & continuous mass concentration by particle size; soil analysis for particle size distribution and elemental composition | ”Sand catchers” to measure overall sand flux, and “Sensit” samplers to record sand movement at a specific point in time. |

SLO APCD Sampling and Analysis

The SLO APCD portion of the study included operating PM₁₀ monitors and wind direction and speed sensors at locations downwind from the SVRA, as well as locations to the north and south of the SVRA that are downwind from “control areas” where no OHV traffic is present. In the District operated network, most monitoring stations were equipped with new technology continuous PM₁₀ monitors. Past particulate monitoring on the Nipomo Mesa has been performed with only manual samplers that produce a single 24-hour average every 6 days. The new technology PM₁₀ monitors produce a continuous recording of PM₁₀ concentration that is much easier to correlate to wind conditions and therefore the source of the particulates. The SLO APCD PM₁₀ measurements record only the mass of airborne particles smaller than 10 microns, and do not typically analyze the composition of the particles being measured. An exception is the Pier Avenue station, where manual 24 hour PM₁₀ measurements were made. In order to better understand the role of salt particles on samples taken so close to the ocean, the Pier Avenue filters were analyzed for chloride ions by the CARB inorganic laboratory in Sacramento.

Delta Group Sampling and Analysis

The Delta Group portion of the study included the use of their customized drum samplers (figures 2.1 and 2.2 below). The drum sampler was developed by the Delta Group and has been used worldwide; it provides much more detail on the size and composition of PM₁₀ particles than is available with traditional monitoring methods. The drum sampler has the capability to measure the mass and elemental composition of various size categories of airborne particles, which provides a much wider range of information for determining the source of particles.

The Delta Group performed both long term (one year) drum sampler measurements and short term ambient PM₁₀ measurements during the spring and fall of 2008 when high wind conditions were forecast. In addition to the ambient drum sampler measurements, the Delta Group collected over 150 soil samples along upwind transects from most monitoring locations. Selected soil samples were analyzed for particle size distribution as well as elemental composition.

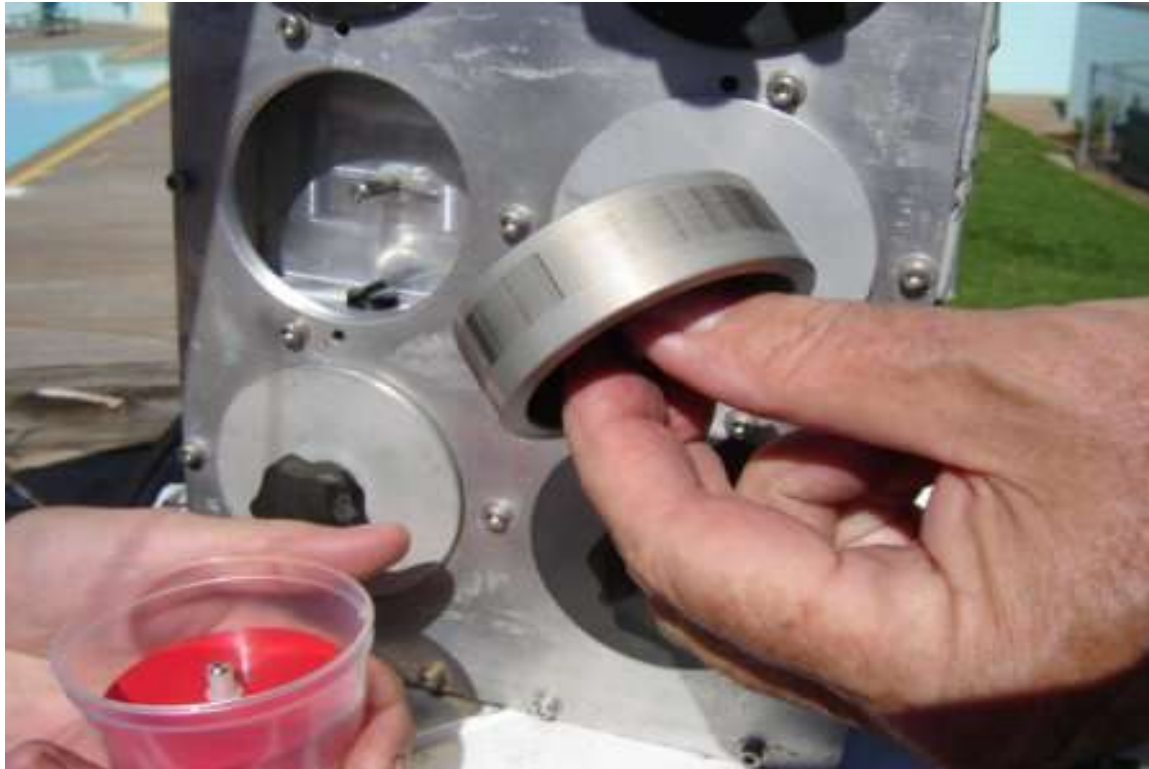


Figure 2.1- Drum Sampler with One Drum Removed

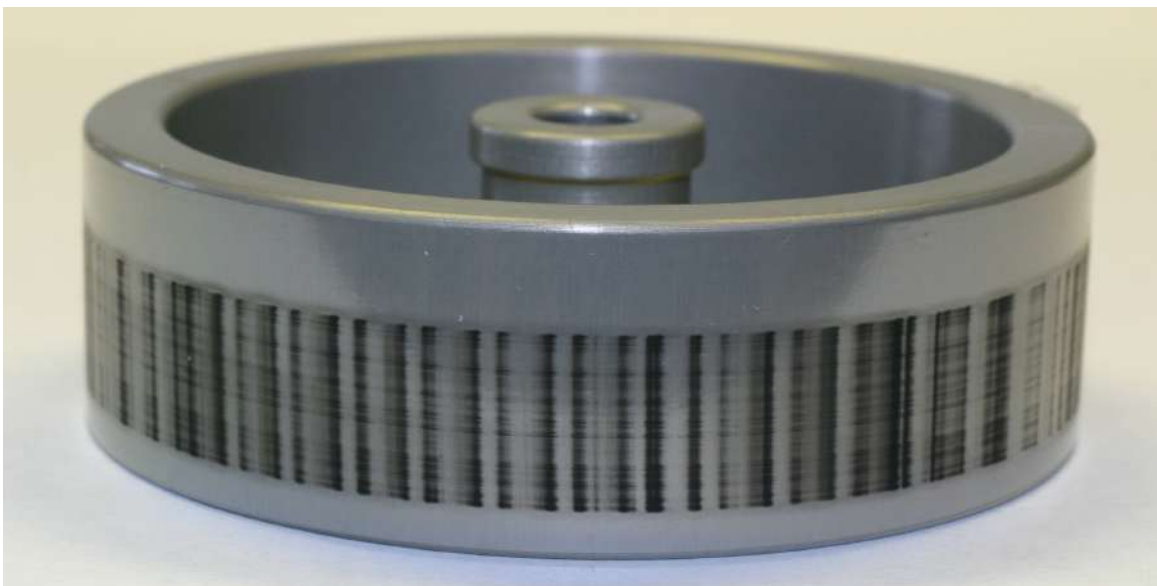


Figure 2.2 - Drum with Deposited Fine Particulates

Table 2.2 and Figure 2.3 below outline the specific location and type of measurement performed by both the SLO APCD and the Delta Group.

Table 2.2– Listing of Measurements Performed by SLO APCD and the Delta Group

| Site Name | Main Purpose of Site | Delta Group Measurements | Delta Group Sampling Period | APCD Measurements | APCD Sampling Period |
|------------------|---|----------------------------------|------------------------------------|---|-----------------------------|
| Ten Commandments | South Control Site | 8 Drum Sampler (battery powered) | 4/26/08-5/12/08 | None | None |
| Dune Center | South Control Site | 8 Drum Sampler | Sept 2008 – Nov 2008 | Continuous PM ₁₀ (E-BAM) | March 2009 |
| Oso | South Control Site | 8 Drum Sampler (battery powered) | 4/26/08-5/12/08 | Continuous PM ₁₀ (solar powered E-BAM), Wind Speed, Wind Direction, Temp., Relative Humidity | March 2008-March 2009 |
| Mesa2 | Site Downwind From SVRA | 8 Drum Sampler | January 2008-February 2009 | Continuous PM ₁₀ (TEOM),FRM PM ₁₀ (one is six days) Wind Speed, Wind Direction, Temperature | March 2008-March 2009 |
| Conoco Upwind | Site Downwind From SVRA | 8 Drum Sampler (battery powered) | 4/26/08-5/12/08 | None | None |
| Hillview | Continued From Phase1, asses localized impact from dirt road. | None | None | FRM PM ₁₀ (one in six days) | March 2008-March 2009 |
| CDF | Site Downwind From SVRA | 8 Drum Sampler | 4/26/08-6/20/08 | Continuous PM ₁₀ (TEOM),Wind Speed, Wind Direction, Relative Humidity | March 2008-March 2009 |
| Bluff | North Control Site, also downwind from agricultural operations. | 8 Drum Sampler | 4/26/08-5/12/08 | None | None |
| Silver Spur | North Control Site | 3 Drum Sampler | 4/26/08-5/12/08 | None | None |
| Pier Ave. | Asses PM10 exposure in an areas where monitoring has never been performed | 3 Drum Sampler | 4/26/08-5/12/08 | FRM PM ₁₀ (one in six days) for mass and chloride ion | March 2008-March 2009 |
| Grover Beach | North Control Site | 8 Drum Sampler | 4/26/08-5/12/08 | Continuous PM ₁₀ (TEOM),Wind Speed, Wind Direction | March 2008-March 2009 |

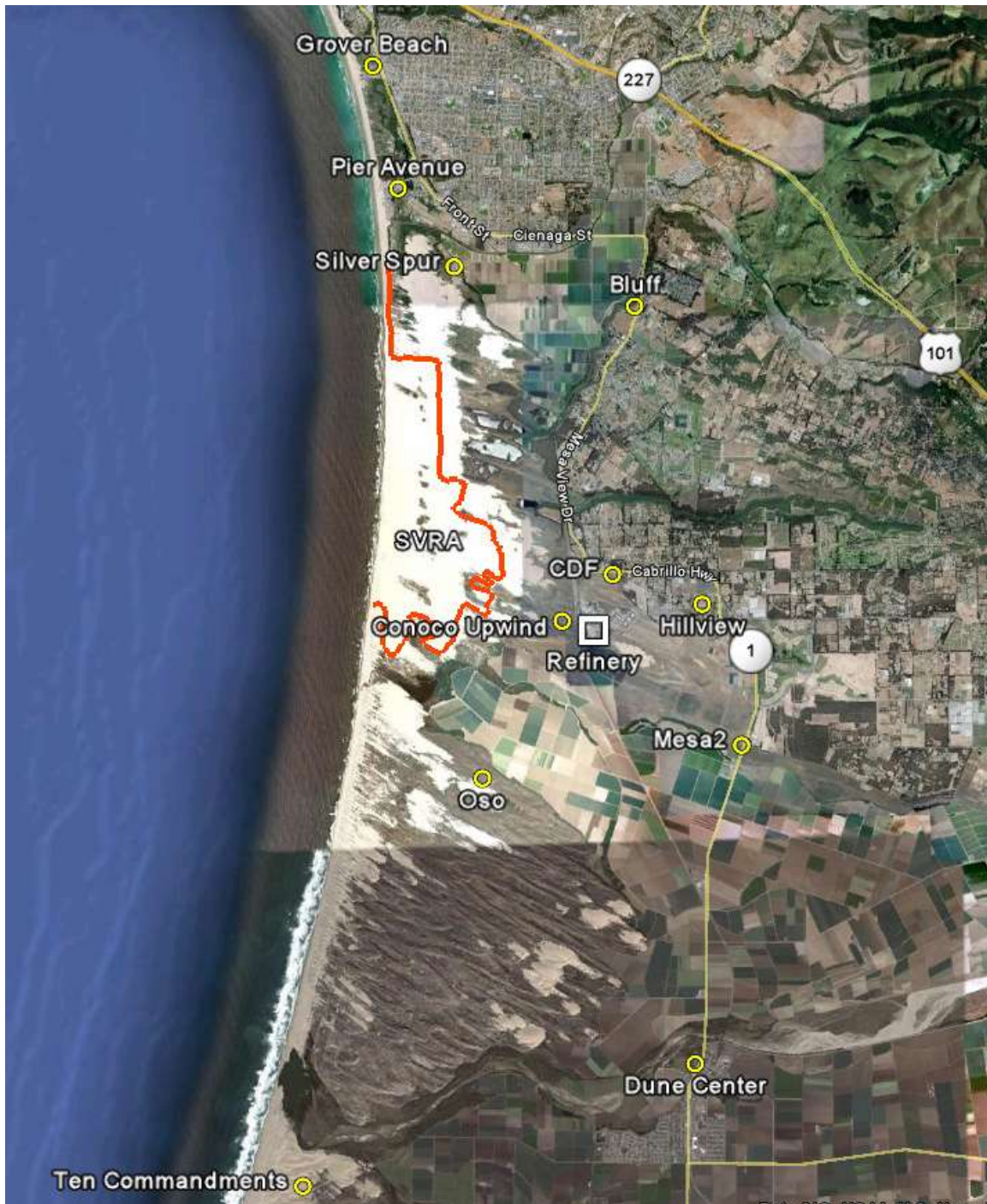


Figure 2.3 – Location of SLO APCD and Delta Group Monitoring Stations

Great Basin Unified APCD and CARB Sampling and Analysis

The GBUAPCD and CARB portion of the study collected measurements of sand movement in the SVRA and in a control area south of the SVRA where OHV traffic is currently not allowed. Measuring the movement of soil/sand by winds provides data on the mechanism by which crustal particles become entrained in the air. The entrainment process, depicted in Figure 2.4 below, involves saltation, creep, and suspension of particles in the air.

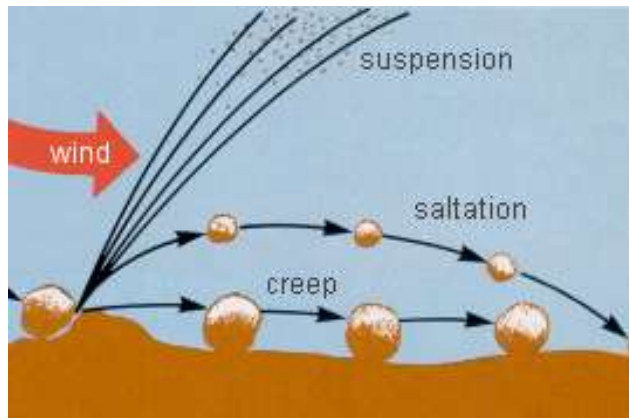


Figure 2.4 – Graphic of the Saltation Process

Various techniques to measure sand movement have been used by many researchers to better understand the “sand flux” process and resulting particulate emissions. The GBUAPCD has utilized and refined these techniques as part of their comprehensive monitoring and mitigation program on the Owens Lakebed. They provided all the necessary equipment, technical guidance, training, and data analysis for this portion of the study. The actual operation and maintenance of the measurement devices, informally known as “sand catchers”, was managed by a local employee of the CARB, Phil Wagner, under the oversight of GBUAPCD. Mr. Wagner also directed the work of several interns hired by SLO APCD to assist him with sample collection from the measurement network.

The sand flux measurement network used two different types of sand catchers (figures 2.5, 2.6, and 2.7 below) designed to measure the total mass of sand movement each day; it also included Sensit samplers, which record how much sand is moving at any point in time by recording each time a grain of sand hits the Sensit. The sand flux measurements were performed from April 23, 2008 through May 24, 2008, the period of highest historical winds in the study area; the Delta Group also conducted their two week intensive monitoring during this period.

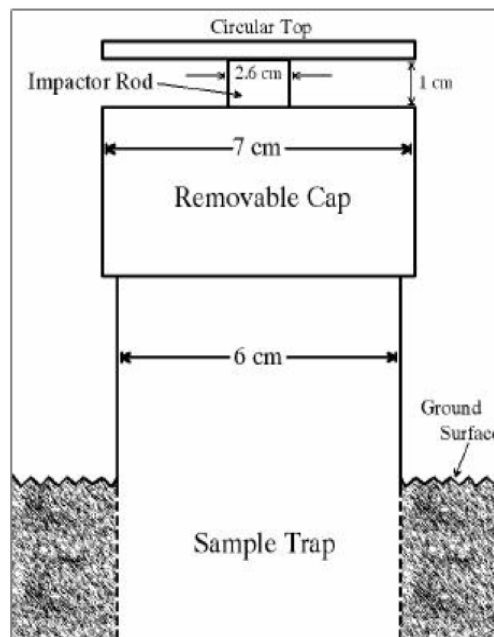


Figure 2.5 - Cox Sandcatcher



Figure 2.6 - BSNE Sandcatcher



Figure 2.7 - Site C2 with Sensit, Cox Sandcatcher, and Datalogger

Figure 2.8 below shows the sand flux measurement locations for the study. Site C1 and C2 were equipped with a sensit, cox sandcatcher, and a BSNE sandcatcher. Site C12 was equipped with a sensit and a cox sandcatcher. All other sand flux measurement sites were equipped with a single cox sandcatcher.

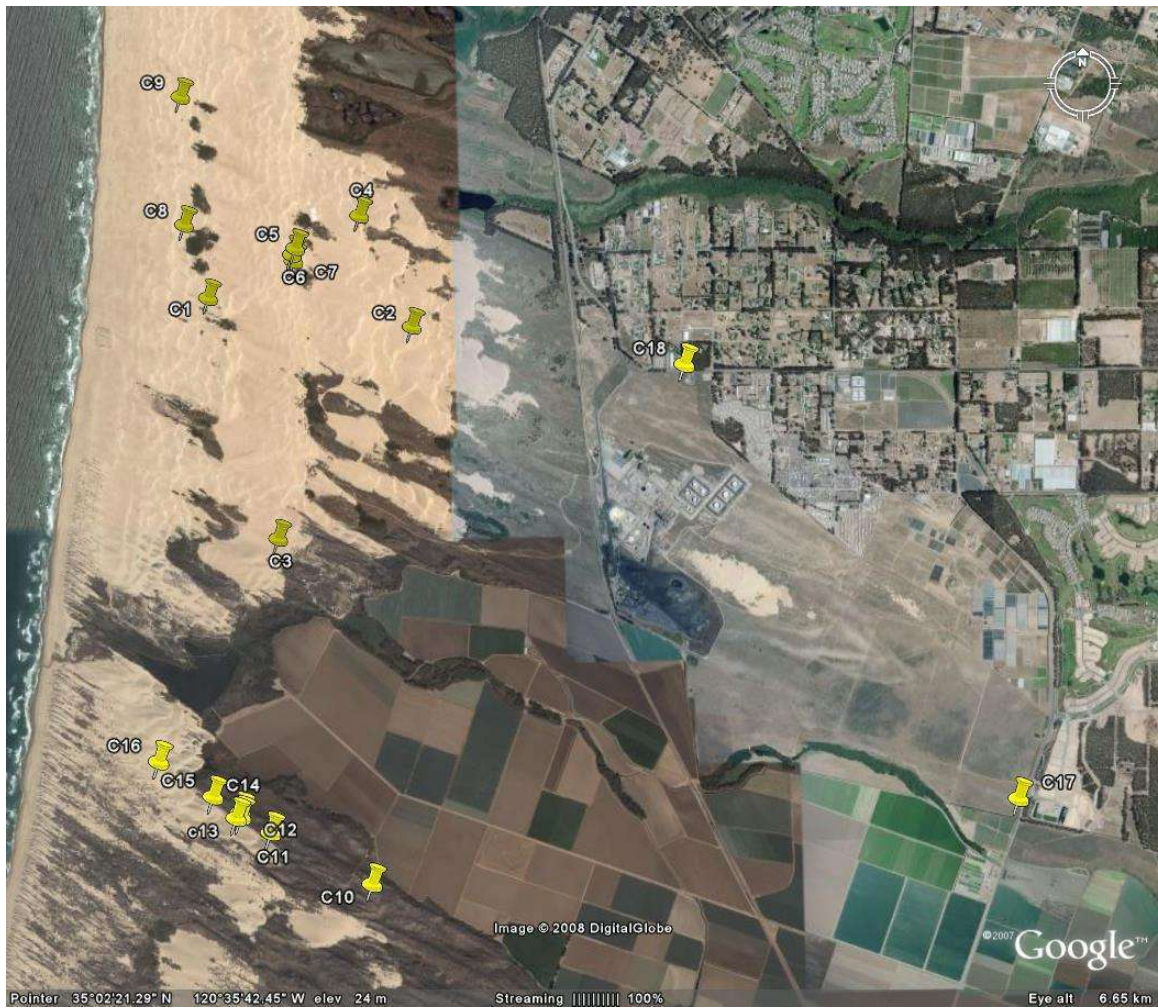


Figure 2.8 – Location of Sand Flux Measurement Locations

3 AMBIENT PM₁₀ AND METEOROLOGICAL MEASUREMENTS AND DATA ANALYSIS

The San Luis Obispo County APCD installed, operated and maintained the instruments used to measure ambient PM₁₀, as well as the meteorological instruments used to record wind speed, wind direction and other weather parameters. This chapter describes the measurements performed and presents the data collected by the SLO APCD during the Phase 2 PM Study.

Monitoring Site Descriptions and Measurements Performed

Each monitoring station and the data gathered are described starting with the most northern station and ending with the most southerly station. Refer to Figure 2.3 for the location of each monitoring station.

Grover Beach Monitoring Station

The Grover Beach monitoring station was selected as a northern control site to measure PM₁₀ particulate concentrations and meteorological conditions north of the SVRA where there is no upwind OHV traffic. It is located 0.3 miles from the ocean following prevailing ocean winds (300 deg). This station was operated by the SLO APCD for many years as a background site, measuring gaseous pollutant concentrations of the oceanic air mass as it comes onshore. Because of the close proximity to the ocean, particulates had never been previously measured at this station as it clearly would be heavily influenced by airborne sea salt. However, for this study, particulate measurements provide a record of conditions upwind of any OHV/SVRA influence, while acknowledging the heavy influence of sea salt.



Figure 3.1– Aerial View of Grover Beach Monitoring Station



Figure 3.2 - Grover Beach Monitoring Station (North View)

Study measurements at this site included wind speed, wind direction and sigma theta at 10 meters and continuous PM_{10} at 3.5 meters. The PM_{10} measurements were made using a Rupprecht and Patashnick tapered element oscillating microbalance (TEOM). This instrument is certified by the US EPA as a Federal Equivalent Method (FEM), which allows the data to be compared to the PM_{10} health standards.

Figure 3.3 below is a wind rose depicting wind patterns for the Grover Beach Monitoring Station during the Study Period. The wind rose shows the predominant wind direction is from the west. It also shows wind speeds greater than 17 mph only occur under westerly winds.

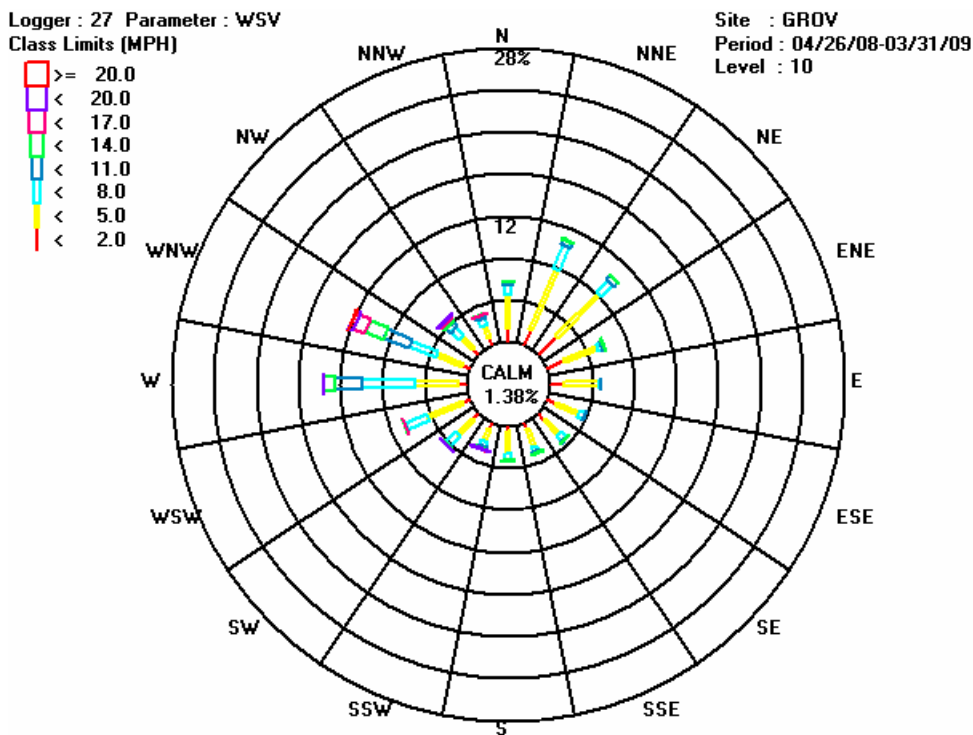


Figure 3.3 – Grover Beach Wind Rose Summarizing Wind Conditions

Figure 3.4 below presents the 24-hour average PM_{10} values for the study period. The Grover Beach dataset shows numerous violations of the state 24-hour PM_{10} standard of 50 $\mu g/m^3$. However, examining the hourly data in Figures 3.5 and 3.6 below shows nearly all of these violations occurred under light or calm winds, with no consistent wind direction apparent when high concentrations are measured. Measurement of high PM_{10} values from a location so close to the ocean typically represents the impacts of sea salt carried in dissolved form by ocean fog. When the salt-laden fog enters the heated inlet of the PM sampler the moisture evaporates, leaving salt deposits on the filter element. State guidelines provide that if sea salt is a contributing factor to a measured exceedance of the state PM_{10} standard, it will not be considered a violation if it can be demonstrated that no exceedance would have occurred without the salt portion (3). Sea salt particulate or sea salt dissolved in fog has not been shown to have a negative health impact.

Figure 3.5 also shows that strong northwesterly winds off the ocean, with a wind direction around 300 degrees, do not result in high hourly PM_{10} values at Grover Beach. This demonstrates that the high PM_{10} levels associated with northwesterly wind events observed on the Nipomo mesa are not present in the air mass prior to reaching land. Additionally, these data indicate that the undisturbed beach and narrow strip of undisturbed dunes upwind of the monitoring station are not capable of emitting significant amounts of PM_{10} particles, even in high wind conditions.

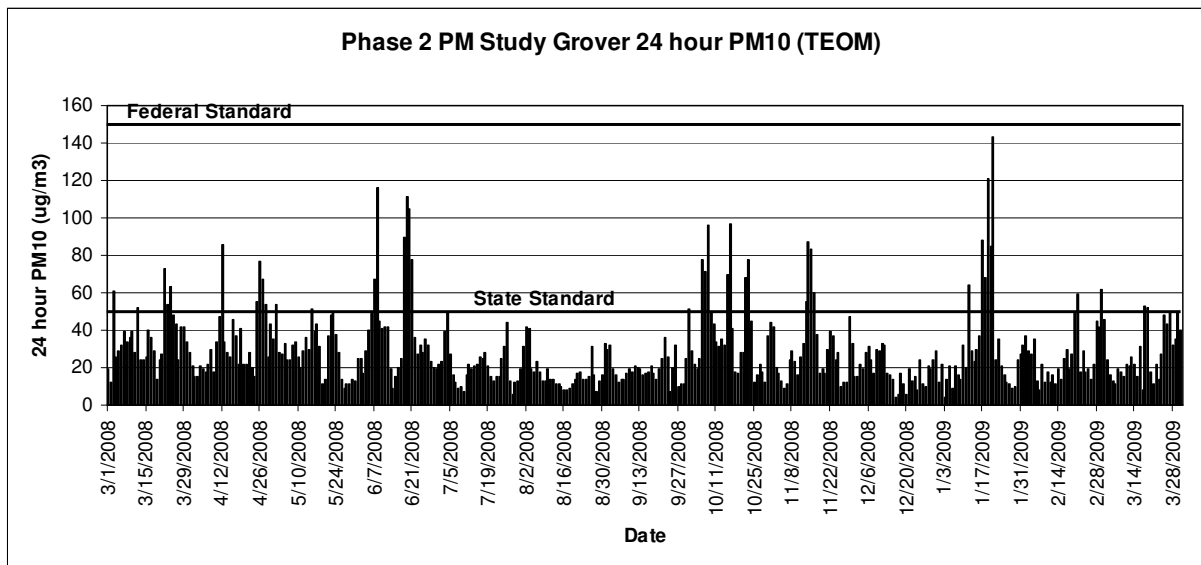


Figure 3.4 – Grover Beach 24-hour PM₁₀ Averages

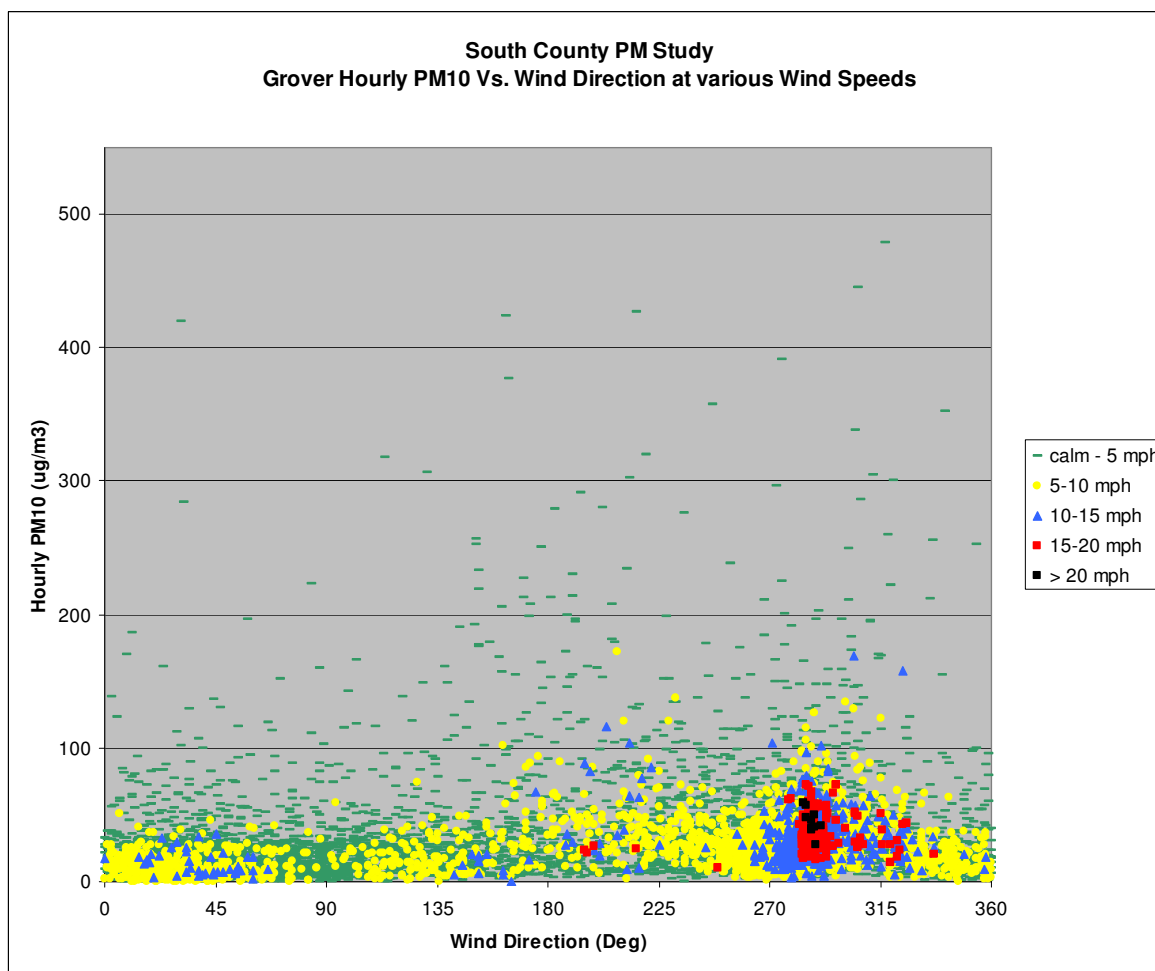


Figure 3.5 – Grover Beach Hourly PM₁₀ Compared to Wind Direction at Various Wind Speeds

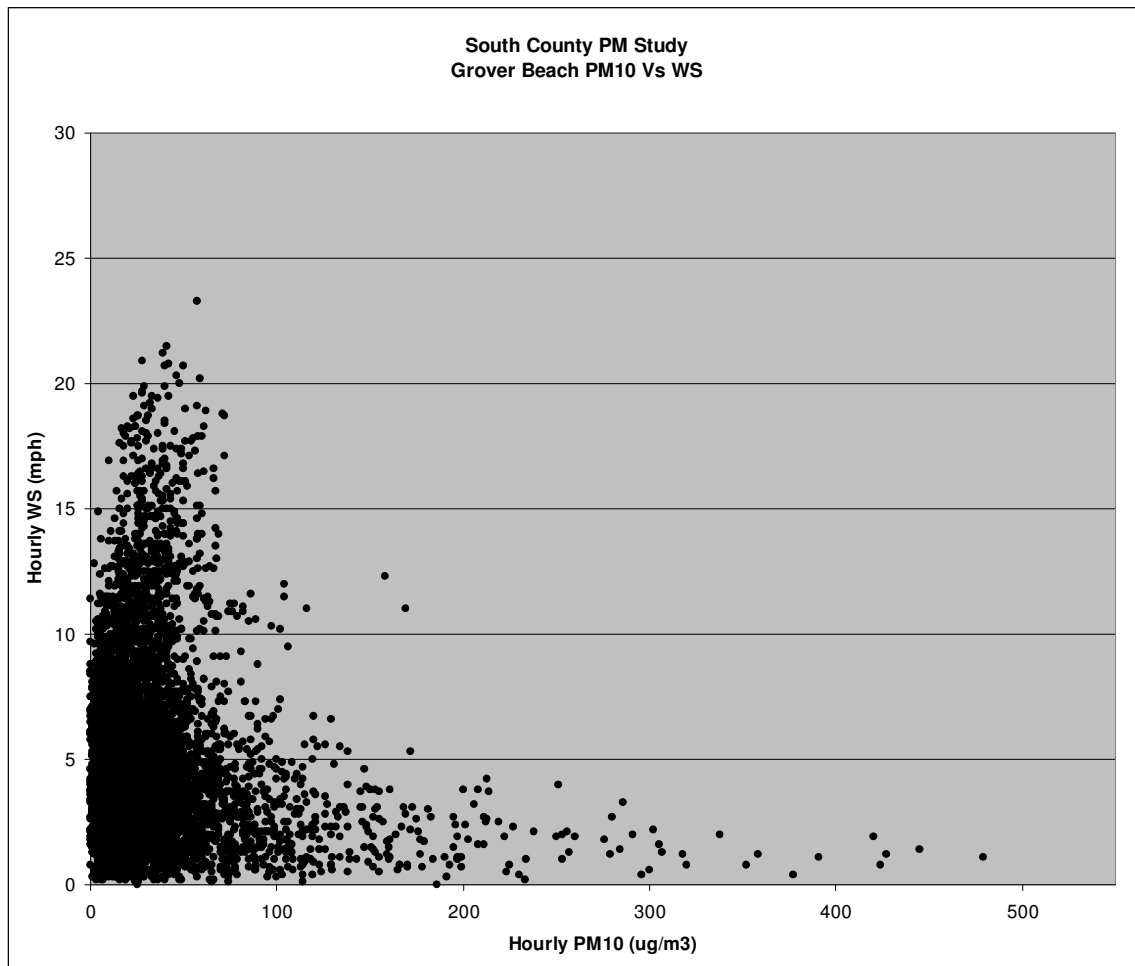


Figure 3.6 – Grover Beach Hourly PM₁₀ as Compared to Wind Speed

Figure 3.7 below is a digital strip chart from the Grover Beach monitoring station. This chart shows a typical day with high PM₁₀ concentrations, demonstrating that the high values occur when the winds are calm and meandering in different directions.

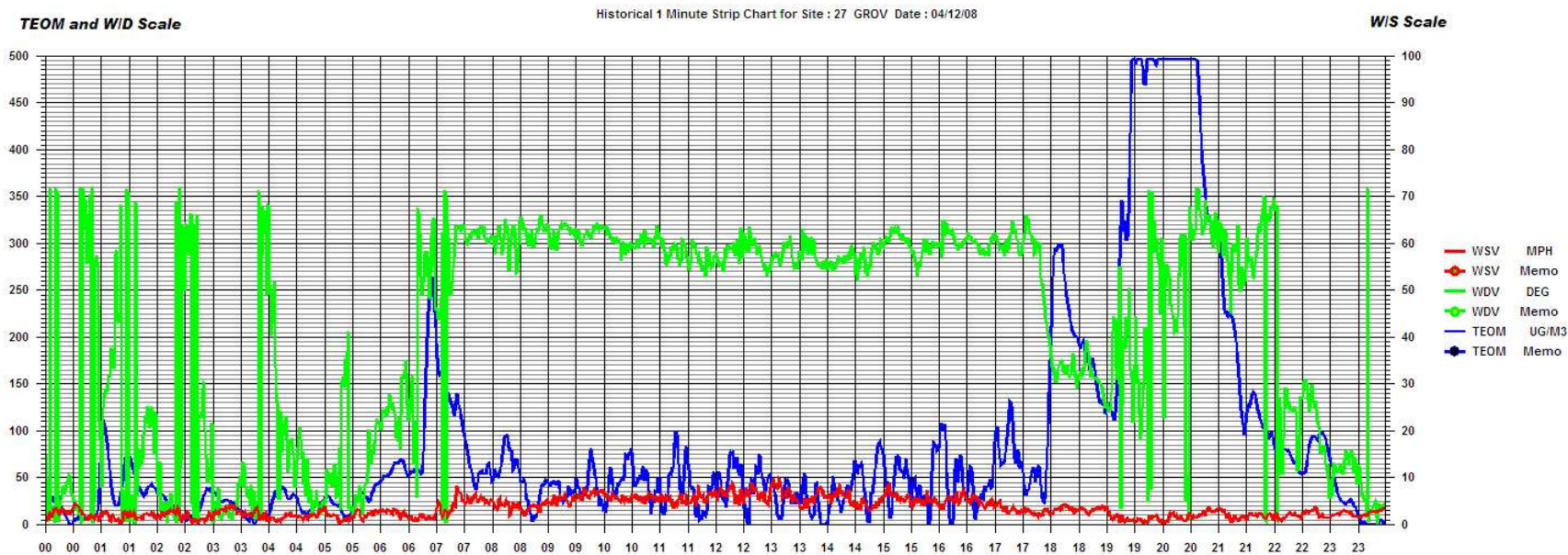


Figure 3.7 - Example Chart for a High PM₁₀ Episode at Grover Beach

Pier Avenue Monitoring Station

The Pier Avenue monitoring station was sited to assess the level of PM_{10} exposure experienced by the residents of Oceano. Historical PM monitoring in the area has only been performed further south on the Nipomo Mesa, with no measurements prior to this study in the beach community of Oceano. However, it was deemed important in this study to perform PM measurements in a populated area close to the dunes for comparison to the data collected on the Mesa. The Pier Ave. monitoring station is located 0.3 miles from the ocean following prevailing ocean winds (300 deg). As with the Grover Beach monitoring station, sea salt was expected to influence the particulate measurements due to the close proximity to the ocean. The site location is downwind (under normal daytime winds) of Pier Avenue, which is the southern entrance to the SVRA. Traffic on Pier Avenue can be quite heavy, and the south side of the street (the SVRA exit lane) is typically covered with a layer of sand (red arrow, below). Observation of vehicles exiting the SVRA showed that much of the deposited sand is track-out from the vehicles coming off the beach; windblown sand may also be a contributing factor.



Figure 3.8 – Aerial View of Pier Avenue Monitoring Station

Data collected at this site were 24-hour average PM_{10} measurements using a hi-volume sampler at 3 meters, measured every 6 days per the national sampling schedule. This instrument is certified by US EPA as the Federal Reference Method for PM_{10} , which allows the data to be compared to the PM_{10} health standards. To allow for differentiation between sea salt particulate and other particles, the PM_{10} sample filters from this site were analyzed for Chloride ion by the CARB inorganic laboratory in Sacramento.

Figure 3.9 below presents the 24-hour PM_{10} measurements from the Pier Avenue monitoring station. Each 24-hour measurement is presented as a single bar, with the red portion representing the portion of mass composed of sea salt, and the black portion representing the mass due to all other non-sea salt sources. Clearly, sea salt is a contributing element in many of the samples taken, as was expected due to the close proximity of the site to the ocean.

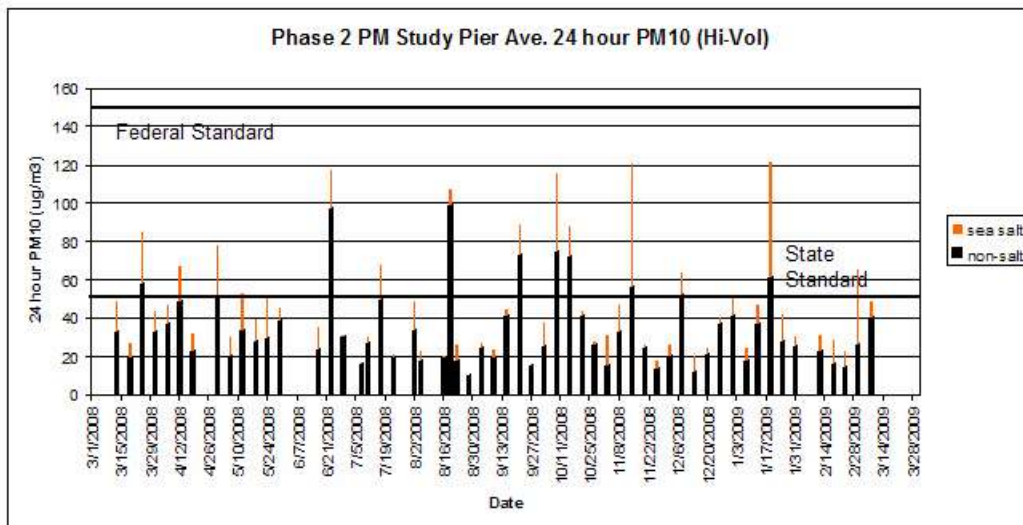


Figure 3.9 – Pier Avenue 24-hour Average PM₁₀ Values

Figure 3.10 below provides a comparison of the PM₁₀ measurements between the Grover Beach and Pier Ave locations. This graph demonstrates that in all but one sample day, the PM₁₀ concentrations measured at Pier Ave. are similar to Grover Beach or higher. There are a number of sample days (3/25/08, 6/23/08, 8/19/08, 9/21/08, 10/9/08) where elevated PM₁₀ levels measured at Pier Ave are not heavily influenced by sea salt. The PM₁₀ values at Grover Beach for these same days were not significantly elevated and each of these days was characterized by moderate to high wind events. This indicates wind blown particulate, rather than sea salt, was responsible for the high concentrations measured at Pier Ave on these days.

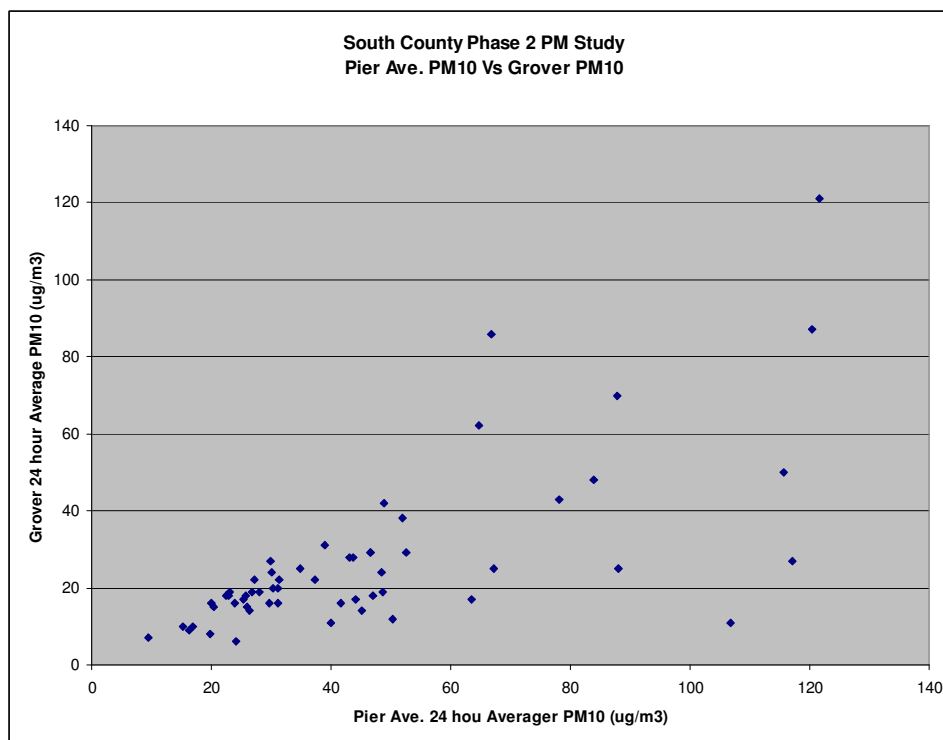


Figure 3.10 – Pier Ave. PM₁₀ Plotted Against Grover PM₁₀

CDF Monitoring Station

The CDF monitoring station was selected to measure meteorological parameters and PM₁₀ levels immediately downwind of the SVRA; this site has been used in previous investigations of high particulates on the Nipomo Mesa. It is located 1.5 miles downwind from the SVRA and 2.7 miles from the ocean following prevailing ocean winds (300 deg).



Figure 3.11 – Aerial View of CDF Monitoring Station



Figure 3.12 – CDF Monitoring Station (Northwest View)

Study measurements at this site include wind speed and wind direction, sigma theta at 7 meters, relative humidity at 4 meters, and continuous PM₁₀ at 3.5 meters. The PM₁₀ measurements were made using a Rupprecht and Patashnick tapered element oscillating microbalance (TEOM). This instrument is certified by the US EPA as a Federal Equivalent Method (FEM), which allows the data to be compared to the PM₁₀ health standards.

Figure 3.13 below is a wind rose depicting wind patterns at the CDF Monitoring Station during the Study Period. The wind rose shows the predominant wind directions from the westerly directions. The highest wind speeds are from the WNW and NW segments.

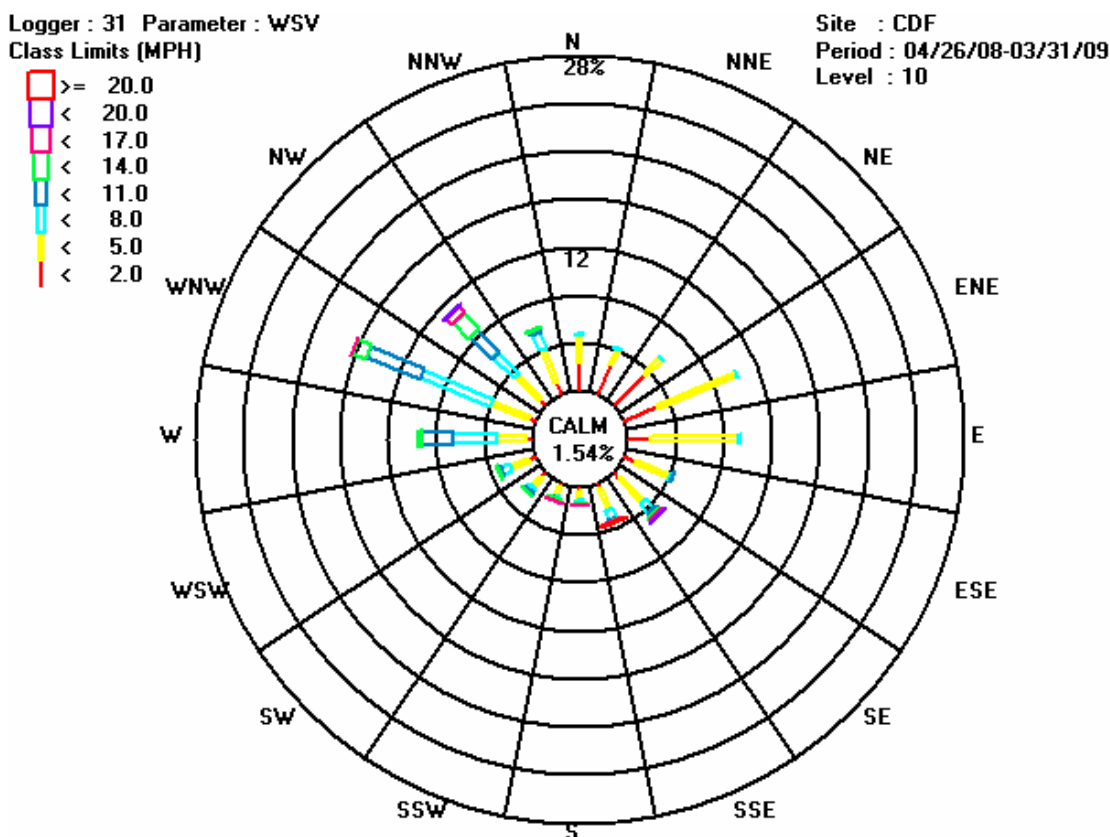


Figure 3.13 – CDF Wind Rose Summarizing Wind Conditions

Figure 3.14 below presents the 24-hour averaged PM₁₀ concentrations from the CDF site; as shown, numerous days exceeded the state 24-hour PM₁₀ health standard of 50 ug/m³. The highest concentration observed here was a 24-hour average of 149 ug/m³, measured on May 21, 2008; the federal 24-hour PM₁₀ health standard is 150 ug/m³. Note that most high concentration days occurred during the spring and fall periods.

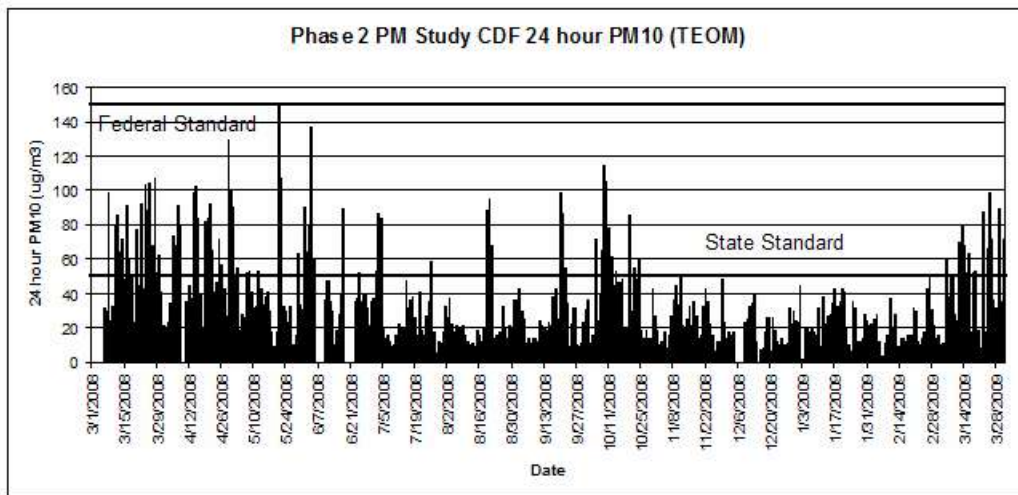


Figure 3.14 – CDF 24-hour Average PM₁₀ Values

Figure 3.15 below presents hourly PM₁₀ concentrations measured at CDF as compared to wind direction at various wind speeds. As shown, the majority of high concentration values occur at a wind direction of approximately 310 degrees, with the higher concentrations from this direction occurring at higher wind speeds. This dominant cluster of high values around 310 degrees clearly indicates a significant source of particulates upwind in this direction. The high wind speeds associated with these high concentrations provide a strong indication that the PM₁₀ source is wind blown material.

There are a few moderately high PM₁₀ data points that occur when the wind speed is below 5 mph, as shown in Figure 3.16 below. Because these values occur under calm conditions it is unlikely they are a result of wind blown particles. These values tend to occur in the morning when the winds are calm and the direction is shifting from drainage winds to onshore flow. This pattern indicates that these moderate concentration PM₁₀ data points are most likely due to sea salt making its way from the coast under stable conditions that limit dispersion, such as fog. While the data does not prove that these moderate PM₁₀ values are salt, it is clear that these moderate values are not caused by wind blown sand due to the wind speed being well below the threshold for sand movement identified in Chapter 4.

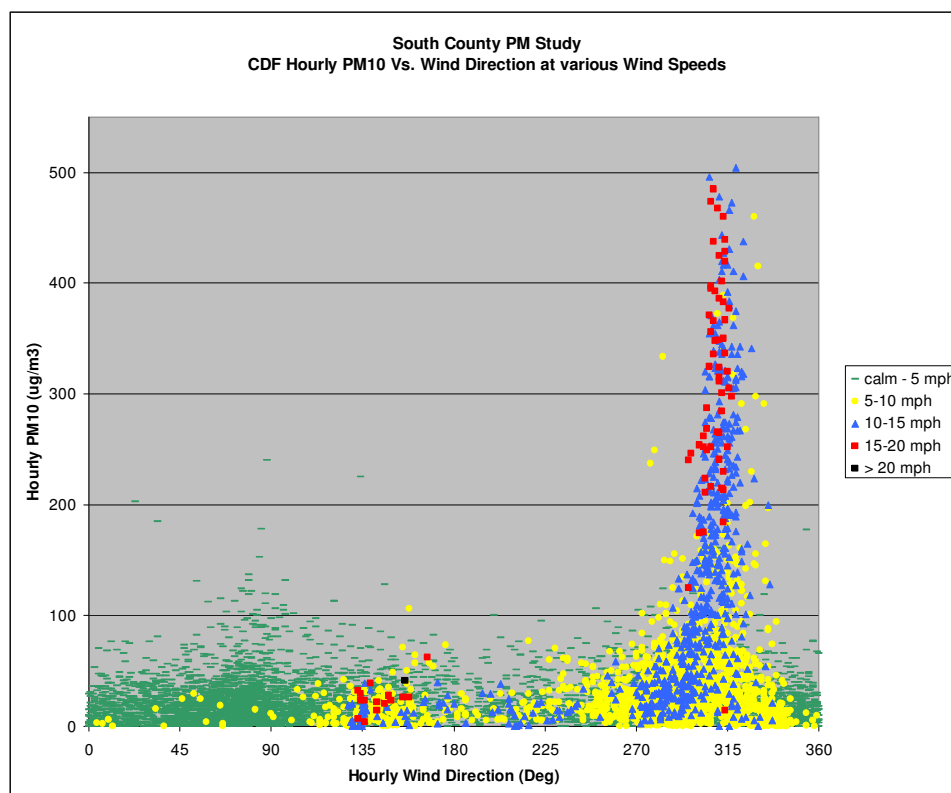


Figure 3.15– CDF Monitoring Station Hourly PM₁₀ as compared to Wind Direction

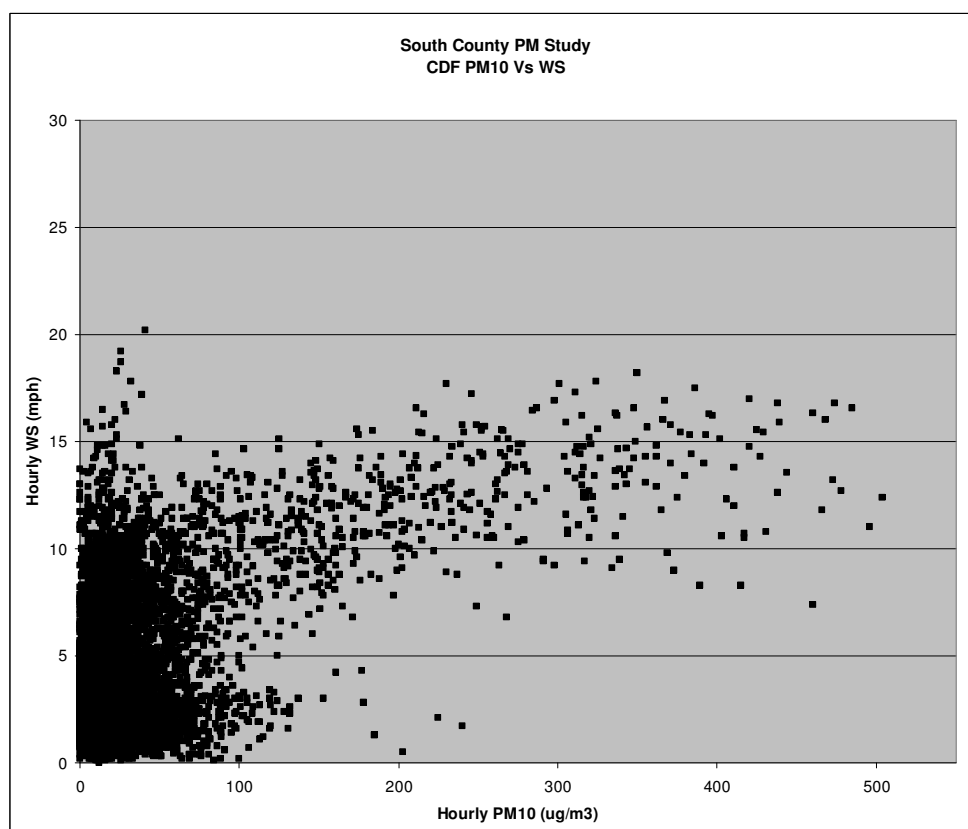


Figure 3.16 – CDF Hourly PM₁₀ as compared to Wind Speed

Hillview Monitoring Station

The Hillview monitoring station is located 2.8 miles downwind from the SVRA and 3.8 miles from the ocean following prevailing ocean winds (300 deg). The sampler is located approximately 15 meters north of Hillview Road, a dirt road used to access this small neighborhood. The station was utilized for the Phase 1 PM Study and appeared to show influence from a nearby dirt road. During that study it was often observed that, under light wind conditions, a cloud of dust would move across the sampling location when a car drove past the site. However, the dust plume would disperse quickly, indicating a highly localized, short-term influence from the dirt road. Thus, the operation of this monitoring site was continued past the Phase1 sampling period and included in the Phase 2 study.

Study measurements at this site were 24-hour averaged PM_{10} at 2 meters, measured every 6 days per the national sampling schedule using a hi-volume sampler. This instrument is certified by US EPA as the Federal Reference Method for PM_{10} , which allows the data to be compared to the PM_{10} health standards.



Figure 3.17 - Aerial View of Hillview Monitoring Station

Figure 3.18 below presents the 24-hour average PM_{10} concentrations measured at Hillview. Figures 3.19 and 3.20 below present the relationship between the 24-hour PM_{10} measurements at Hillview compared to Mesa2 and CDF. Examining these figures shows that, at the lower concentrations typically found at lower wind speeds, Hillview is consistently higher than Mesa2 and CDF; however, at the higher concentrations typically associated with high wind speeds, the levels at the two sites are much closer. This relationship is consistent with localized impacts from a nearby source, such as a dirt road. On sample days without a wind event, the impact of the dirt road is significant due to less dispersion and very little influence from wind blown dust. However, on days with a significant wind event, the impact of the local dirt road is much less significant because of better dispersion and the overwhelming influence of wind blown dust, minimizing the impact of this local source.

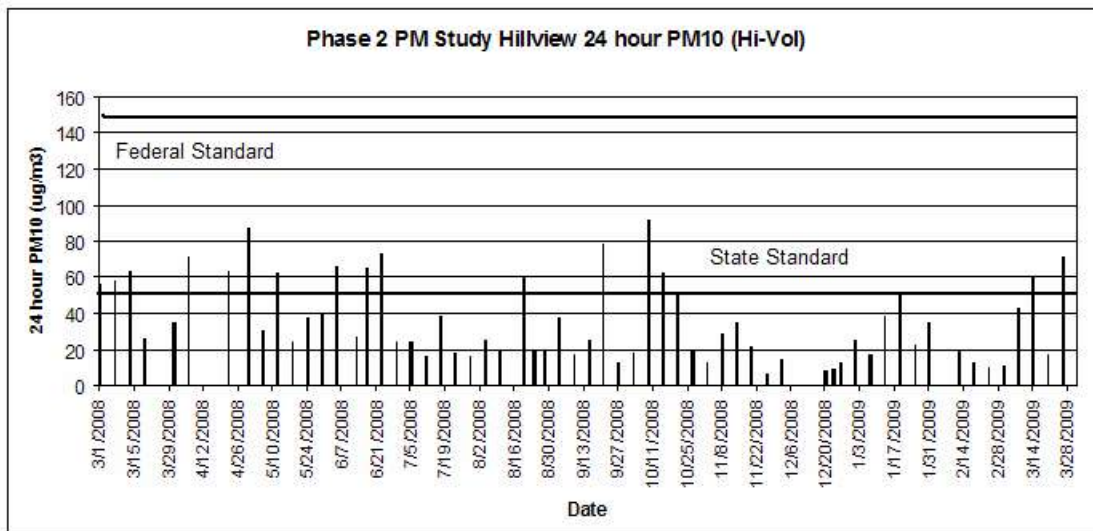


Figure 3.18- Hillview 24-hour Average PM₁₀ Values

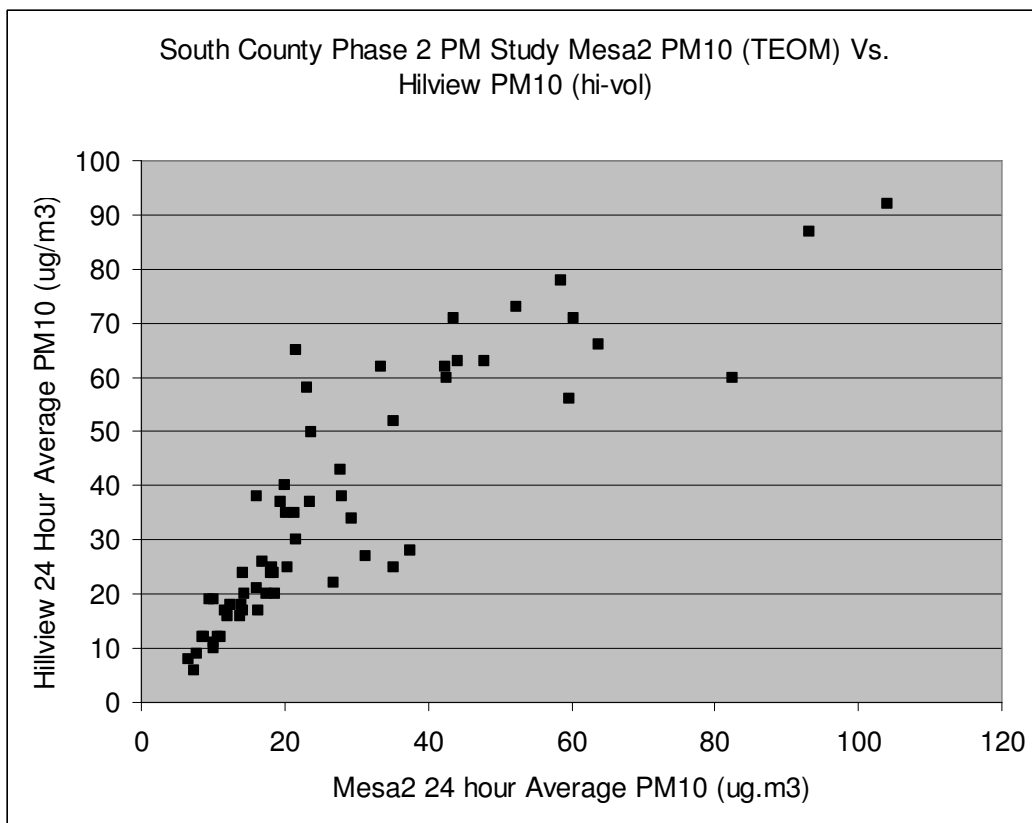


Figure 3.19 – Hillview 24-hour PM₁₀ as Compared to Mesa2 24-hour PM₁₀

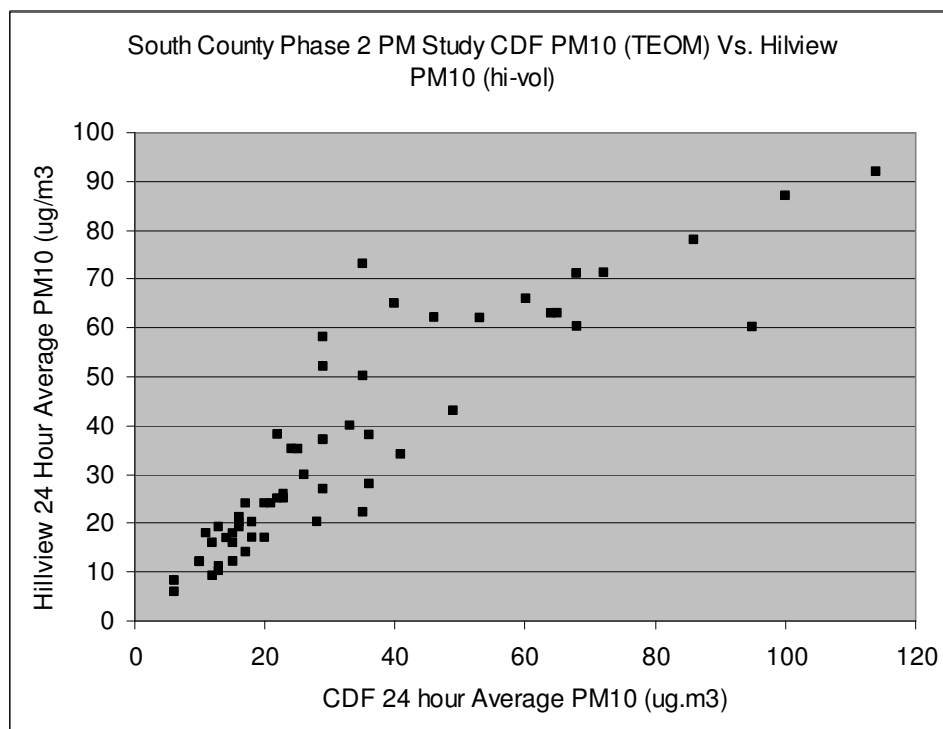


Figure 3.20 – Hilview 24 hour PM10 as Compared to CDF 24-hour PM₁₀

Mesa2 Monitoring Station

The Mesa2 monitoring station was selected to measure particles downwind from the SVRA. This site is located 3.1 miles downwind from the SVRA and 4.4 miles from the ocean following prevailing ocean winds (300 deg). The Mesa2 monitoring station is owned by ConocoPhillips and has been operational since the early 1990's. As a study partner, ConocoPhillips allowed the SLO APCD to utilize existing equipment at the station and install additional new equipment for this study.



Figure 3.21 - Aerial View of Mesa 2 Monitoring Station



Figure 3.22 - Mesa 2 Monitoring Station

Study measurements at this site include wind speed, wind direction and sigma theta at 10 meters, temperature at 3.5 meters, continuous PM_{10} at 3.5 meters, and 24-hour average PM_{10} at 2 meters. The continuous PM_{10} measurements were made using a Rupprecht and Patashnick tapered element oscillating microbalance (TEOM). This instrument is certified by the US EPA as a Federal Equivalent Method (FEM), which allows the data to be compared to the PM_{10} health standards. The 24-hour PM_{10} measurements were made using a hi-volume sampler. This instrument is certified by US EPA as the Federal Reference Method for PM_{10} , which allows the data to be compared to the PM_{10} health standards.

Figure 3.23 below presents the wind rose for Mesa2, summarizing wind conditions for the site. As is typical throughout the area, the most predominate direction is WNW and the highest wind speeds are from the northwesterly directions.

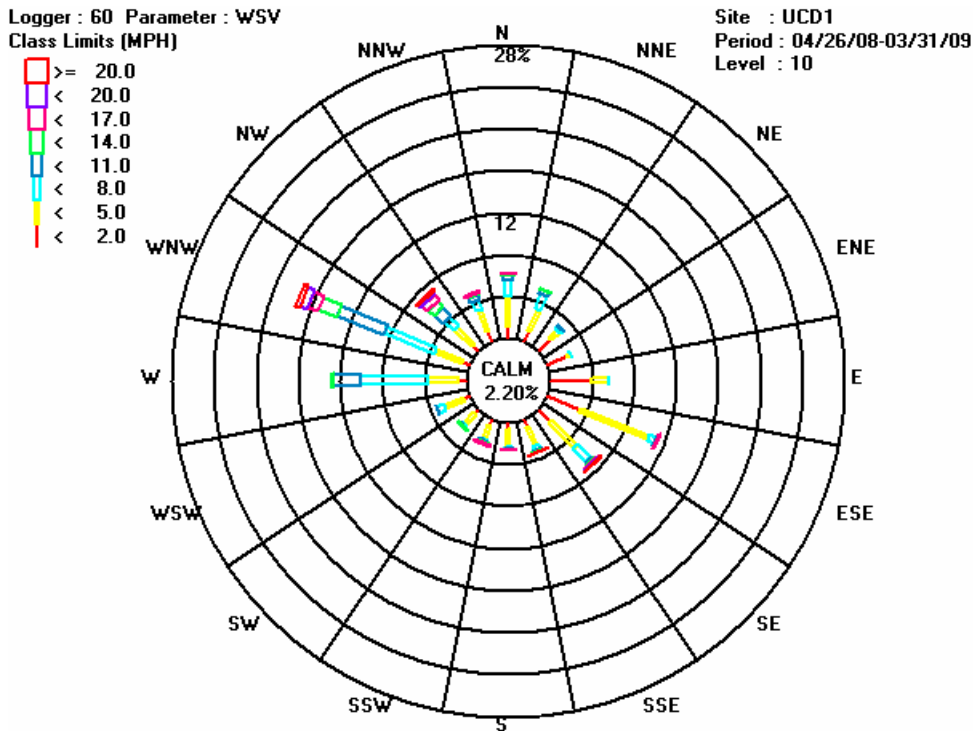


Figure 3.23 – Mesa2 Wind Rose Summarizing Wind Conditions

Figure 3.24 below presents the 24-hour average PM₁₀ values for Mesa2, showing most exceedances of the state health standard occurring in the spring and fall. The highest level seen was 147 ug/m measured on 6/6/08, approaching the federal health standard of 150 ug/m³.

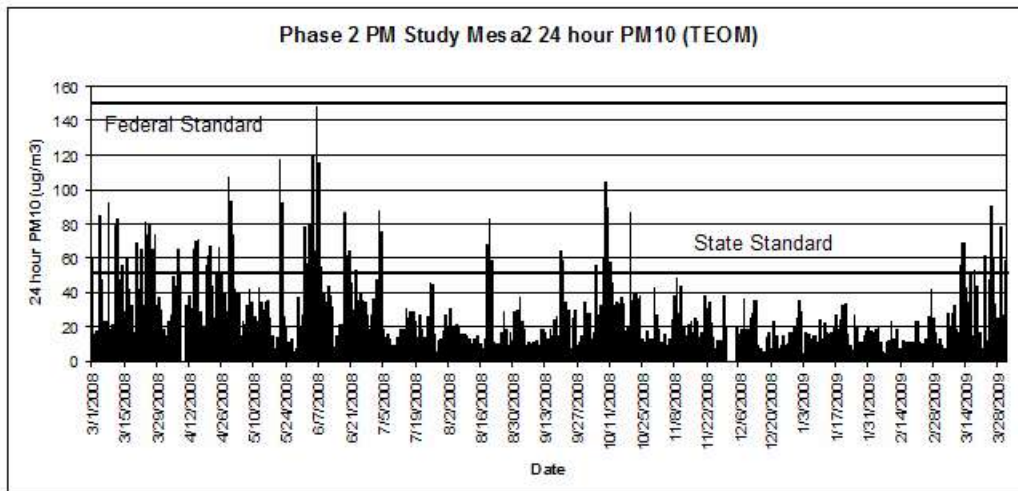


Figure 3.24 – Mesa2 24-hour Average PM₁₀ Values

Figure 3.25 below presents the hourly PM₁₀ concentration compared to wind direction at various wind speeds. Figure 3.26 presents hourly PM₁₀ concentration compared to wind speed. As was observed at the CDF monitoring site, the vast majority of high concentration PM₁₀ values occurred during high winds blowing from the northwesterly direction. Again, this clearly indicates a large source of wind blown material to the northwest of the monitoring location.

Figure 3.25 also shows a small number of high wind speed data points from the northwest, with low PM₁₀ concentrations. Most obvious in these outliers are the three black (>20 mph) data points at 314-315 degrees and 15-20 ug/m³ PM₁₀ concentration. Investigation of these three data points reveal they occurred on the same day (12/25/08) under post frontal conditions following rainfall when the ground was wet. Review of nearby weather stations and the relative humidity sensor at the CDF station show that the storm had passed and there was no rainfall during the hours when these data values occurred. Investigation of all other low PM₁₀ concentrations measured during high winds from the northwest showed that all occurred during post frontal conditions associated with rainfall. This observation adds compelling evidence that the source of the high particulate concentrations is due to wind blown material.

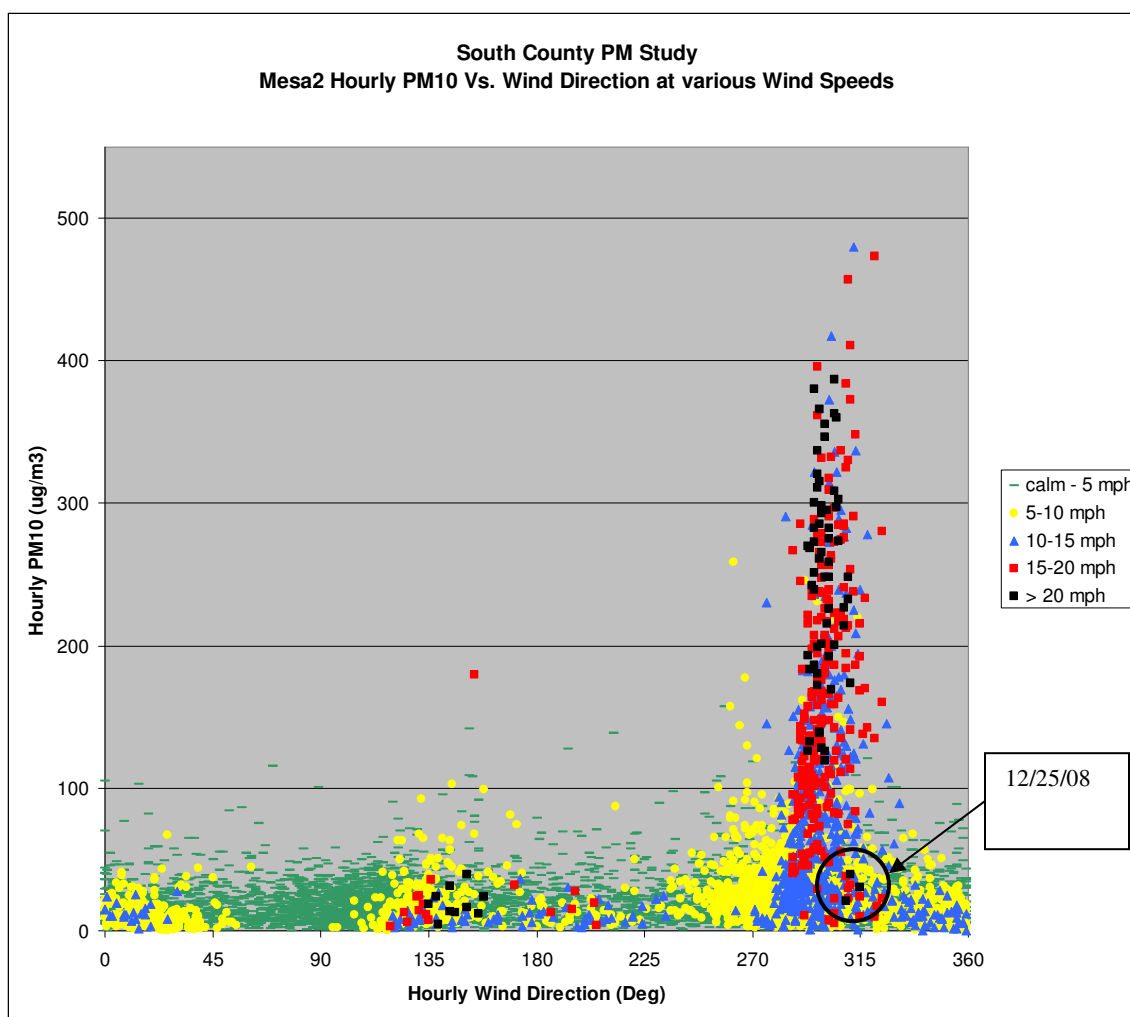


Figure 3.25 – Mesa 2 Hourly PM₁₀ as Compared to Wind Direction at Various Wind Speeds

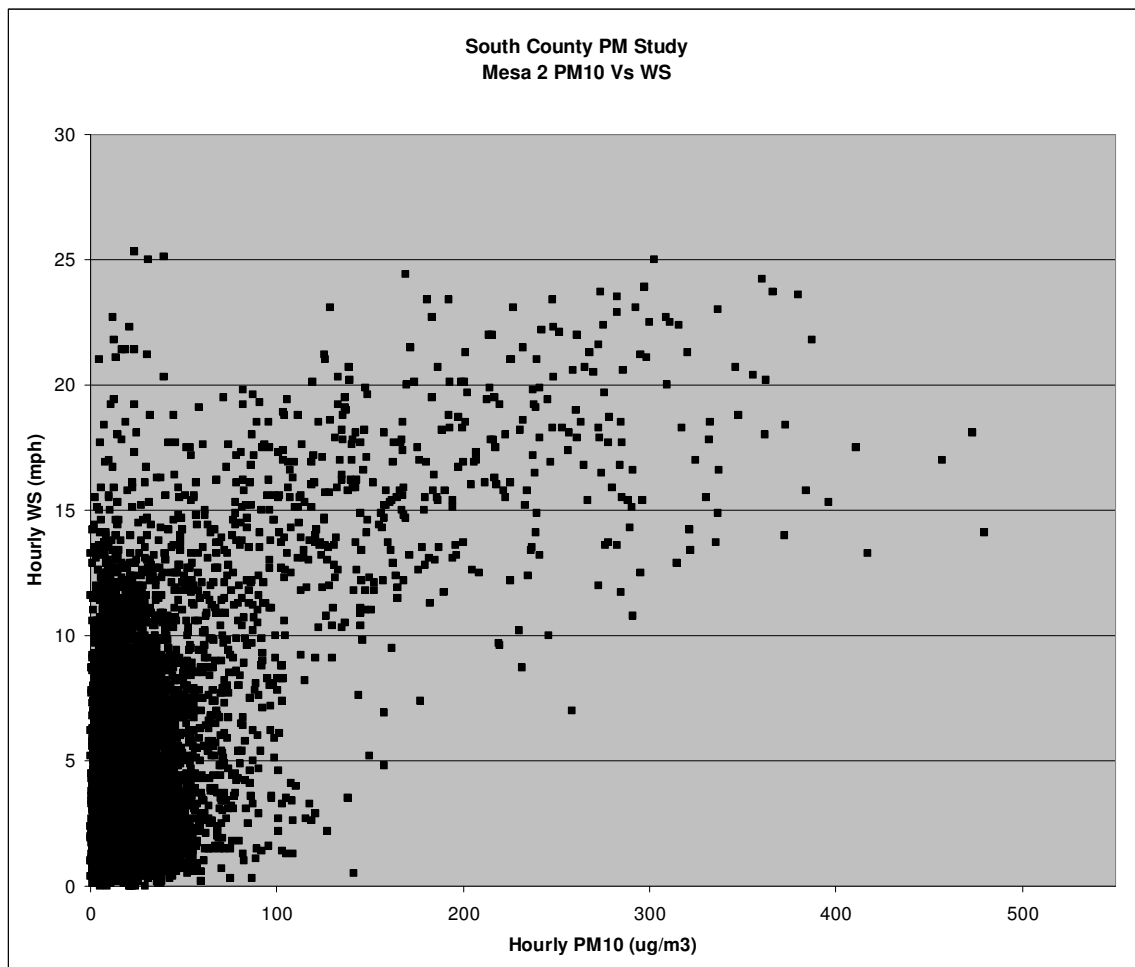


Figure 3.26 – Mesa2 Hourly PM₁₀ as Compared to Wind Speed

Oso Monitoring Station

The Oso monitoring station was selected by State Parks Staff as a southern control site. This site is located downwind of a coastal dune complex where OHV traffic is currently not allowed. Interviews with State Parks personnel indicate that this area was likely used for OHV activity prior to the early 1980's when State Parks took control of the dune area (1). The Oso monitoring station is located 0.4 miles downwind from an open sand sheet and 1.6 miles from the ocean following prevailing ocean winds (300 deg). This location does not have any access to commercial power or other utilities, which required special monitoring methods to be utilized.



Figure 3.27 – Aerial View of Oso Monitoring Station Location



Figure 3.28 - Deployed EBAM



Figure 3.29 - Oso Monitoring Site

Study measurements at this site include wind speed, wind direction, temperature, and relative humidity at 2 meters, and continuous PM_{10} at 2.3 meters. The continuous PM_{10} measurements were made using a MetOne EBAM beta attenuation monitor. The EBAM is not an EPA approved monitoring method, but has compared favorably to EPA FRM measurements in other studies. The EBAM was selected for this monitoring site because it is the only continuous PM_{10} monitor available that can be operated on battery/solar power. In order to ensure comparability between the EBAM and other EPA approved methods, numerous comparisons between EBAM and TEOM measurements were performed at the Mesa2 monitoring station (Appendix A). The results of these comparisons showed excellent correlation during wind events ($WS > 10$ mph); poorer correlation was observed when wind events were not occurring, but PM_{10} concentrations were generally low at those times.

One known limitation of the EBAM is its vulnerability to positive bias during very moist conditions due to the very low power of its inlet heater. This phenomenon was observed during calm/foggy conditions often present at this coastal location. For this study, the data of most interest occurs during wind events when fog is not present; this is likely why the comparisons to the TEOM were so well correlated when the wind was greater than 10 mph. A complete description of these comparisons and handling of the EBAM data is included in Appendix A. Because wind events only occur during a portion of a day, 24-hour averages of the data do not correlate as well with federal methods. Instead, data analysis from this monitoring site needs to be limited to those hourly averages when the wind speed is greater than 10 mph, which include all PM_{10} episode periods observed in this study.

Figure 3.30 below presents a wind rose for the Oso monitoring station. As elsewhere on the Mesa, the predominant wind direction and highest wind speeds are from the northwest. The percentage of higher wind speeds at Oso is much higher than at any of the other study sites that measured wind parameters. The wind sensors at the Oso site were located only slightly less than 2 meters above the ground due to site limitations. The power law can be used to adjust the Oso wind speed data to make it comparable to other sites where the wind sensors were mounted at the standard 10 meter height (2). (Note: the data presented in Figures 3.30, 3.31, 3.32 is the unadjusted wind speed data) Using the power law, the Oso wind speeds presented below would

be multiplied by 1.259 to approximate what the speed would be at 10 meters about ground. Tests were performed to demonstrate that the power law does a good job of correcting the EBAM wind speed data to correlate with a sensor mounted at the standard 10 meter height. Appendix A presents these tests in detail. So clearly, the winds at the Oso monitoring station are much greater than any other study site.

It is also important to note that the wind direction at the Oso site appears much less variable than the other study site locations. This is likely due to the local terrain channeling the winds in the observed principal directions.

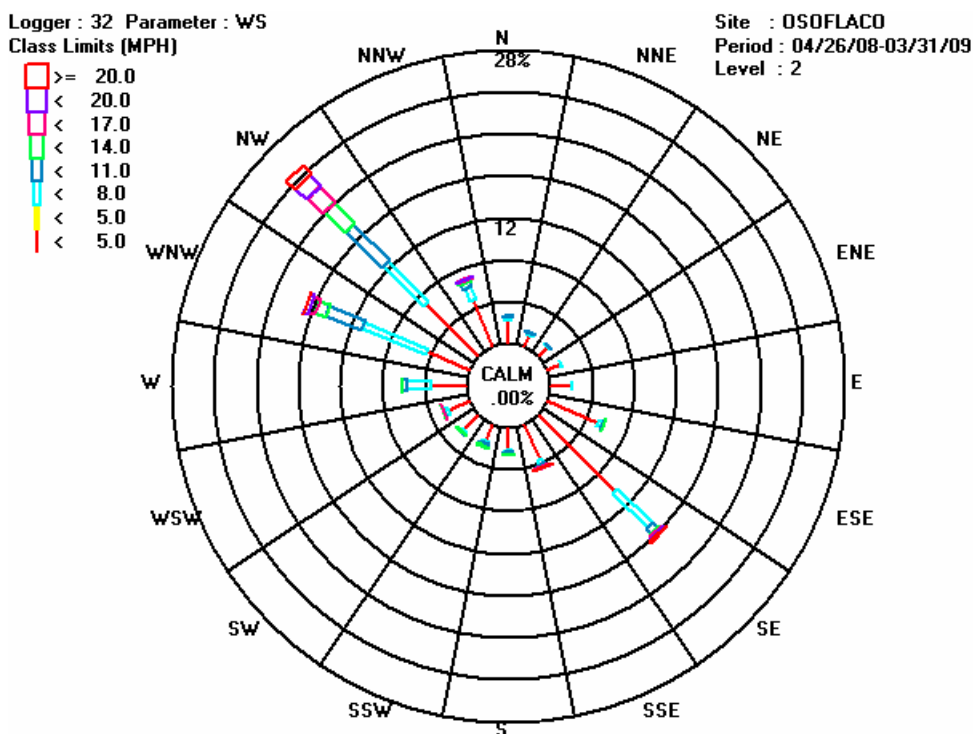


Figure 3.30 – Wind Rose for Oso Monitoring Station

Figure 3.31 below presents the hourly PM_{10} concentration verses wind direction at various wind speeds. Figure 3.32 presents the hourly PM_{10} concentration verses wind speed. As shown in these charts, the majority of high PM_{10} data values occur from a wind direction of approximately 300 degrees at wind speeds almost always over 20 miles per hour; in contrast, a significant portion of high concentration values at the non-control sites occurred at wind speeds between 10-20 mph. Further, the Oso 2-meter wind sensor measurements showing speeds greater than 20 mph would be equivalent to over 25 mph if measured at the standard 10 meter height used at the other sites. Thus, significantly higher wind speeds were required to cause high PM levels at the control site compared to the non-control sites. As was observed at the CDF and Mesa 2 sites, the preponderance of high PM measurements occurring at high wind speeds from the northwesterly direction indicates a source of wind blown material to the northwest of the Oso monitoring station.

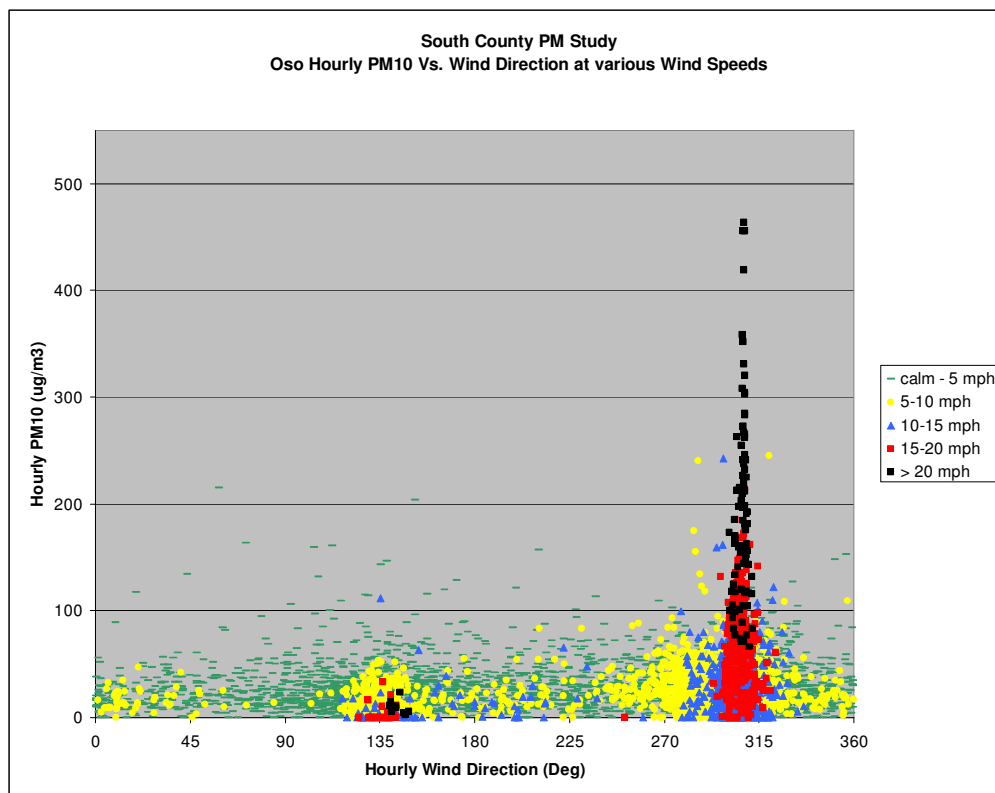


Figure 3.31 – Oso Hourly PM₁₀ as Compared to Wind Direction at Various Wind Speeds

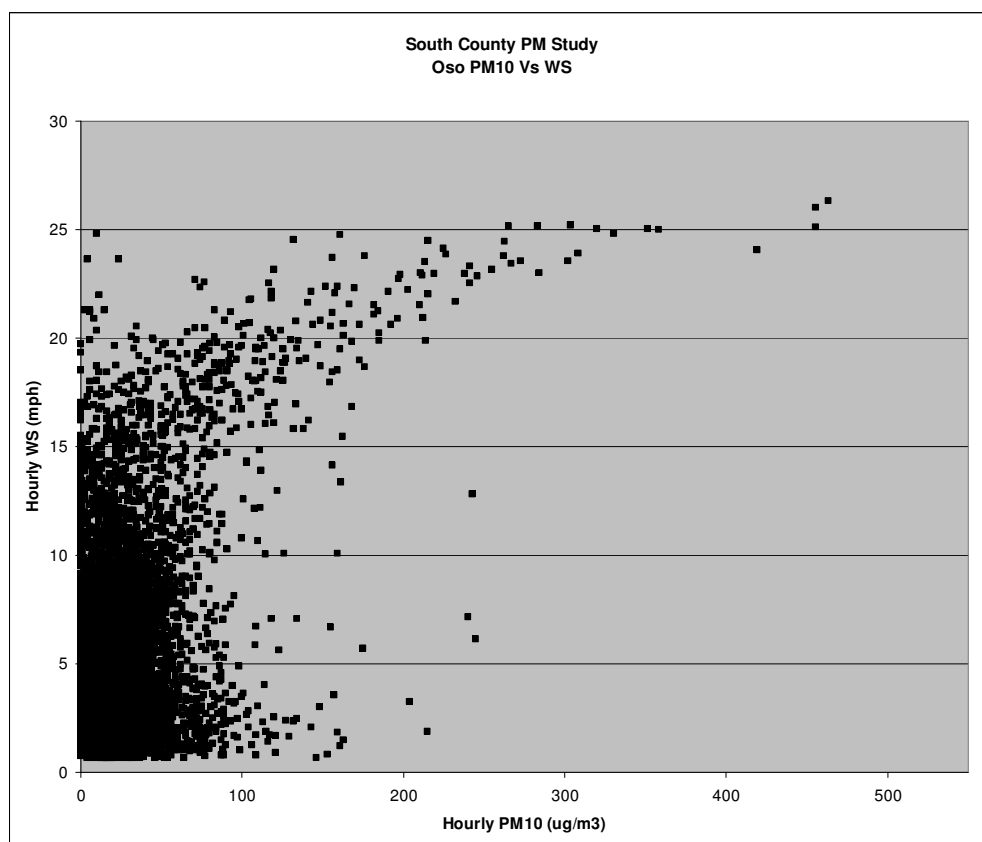


Figure 3.32 – Oso Monitoring Station Hourly PM₁₀ as Compared to Wind Speed

Dune Center Monitoring Station

The Dune Center Monitoring Station was selected as an additional southern control site. This monitoring location was selected to measure particulates downwind from a dune complex where OHV activity is not present, and at a similar distance from the coast as Mesa2. The Dune Center location (Figures 3.33 and 3.34) is 1.6 miles downwind from open sand sheets and 4.4 miles from the ocean following prevailing ocean winds (300 deg).

Study Measurements at this location included only hourly PM_{10} at 2 meters. This site was selected late in the measurement phase of the study and utilized a second EBAM for its measurements. As with the other measurements made with an EBAM (Oso), data analysis should be limited to high wind event periods. (See Appendix A for a complete discussion of this issue.) Measurements at the Dune Center Monitoring Station were only performed from 3/13/09 through 3/31/09, with a data gap from 3/21/09 to 3/25/09 due to a tripped circuit breaker.



Figure 3.33 – Aerial View of the Dune Center Monitoring Station



Figure 3.34 – View of Dune Center Station (northwest)

Figure 3.35 below presents the hourly PM_{10} values for the Dune Center Station. A vague diurnal pattern responding to the daily wind events is present, but with hourly concentrations rarely exceeding 100 $\mu g/m^3$.

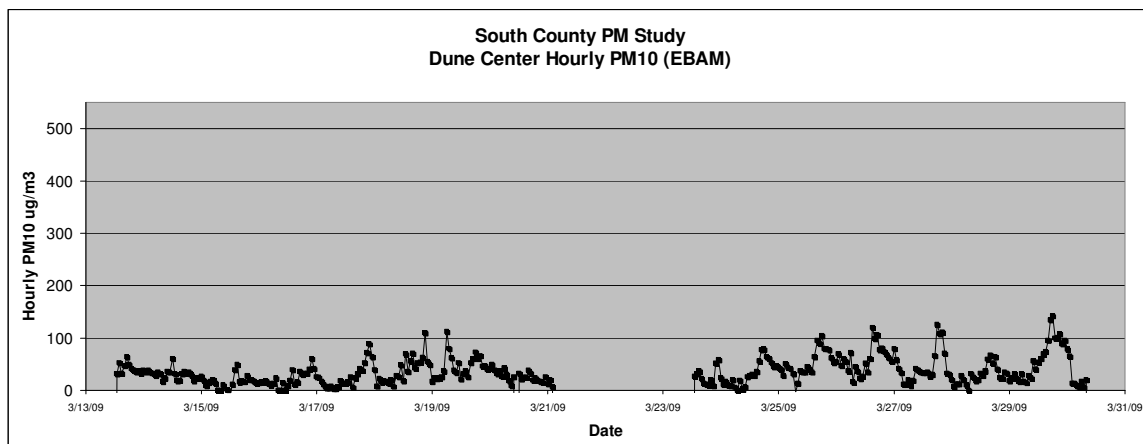


Figure 3.35 – Dune Center Hourly PM_{10} Values

3.1. SLO APCD Data Analysis

3.1.1. Analysis of Meteorological Data

Wind data was gathered as part of the Phase2 Study because previous studies have shown that high PM concentrations were associated with high winds. Wind sensors were located at study

sites throughout the study area. Table 3.1 below summarizes the wind measurements performed at each meteorological site.

Table 3.1 - Wind Measurements at APCD Monitoring Sites

| Monitoring Site | Parameters Measured | Sensor Height above Ground |
|-----------------|---|----------------------------|
| Grover Beach | Wind Speed, Wind Direction, Sigma Theta (stability) | 10 meters |
| CDF | Wind Speed, Wind Direction, Sigma Theta (stability) | 7 meters |
| Mesa2 | Wind Speed, Wind Direction, Sigma Theta (stability) | 10 meters |
| Oso | Wind Speed, Wind Direction | 2 meters |

Historical data demonstrates that the winds associated with high PM episodes are the strong northwesterly winds that occur most often in the spring and fall of each year. These strong sea breezes from the northwest tend to occur in the mid-day to late afternoon as the inland areas heat and draw air inland from the coast.

In spring and summer, a semi-permanent high pressure cell frequently develops in the Eastern Pacific Ocean at the same time that a semi-permanent thermal low forms over the Lower Colorado River valley along the Southeastern California border. The resulting surface pressure gradient can produce periods of strong surface winds from the northwest along the Central Coast of California. These surface winds can be enhanced by periodic upper level weather features, such as a trough at 500 millibars.

These strong northwesterly winds move pristine air across the ocean with no significant terrain to channel or deflect the air flow. Upwind from the study area a portion of this air mass may encounter the Irish Hills prior to reaching the study area, depending on the exact wind direction. This encounter will likely reduce the wind speeds of this air mass. Once the air mass reaches the coast, the coastal terrain acts to change its direction and speed. Figure 3.36 below presents a generalized flow pattern under northwest flow, demonstrating how the coastal terrain can affect wind flow in the study area.

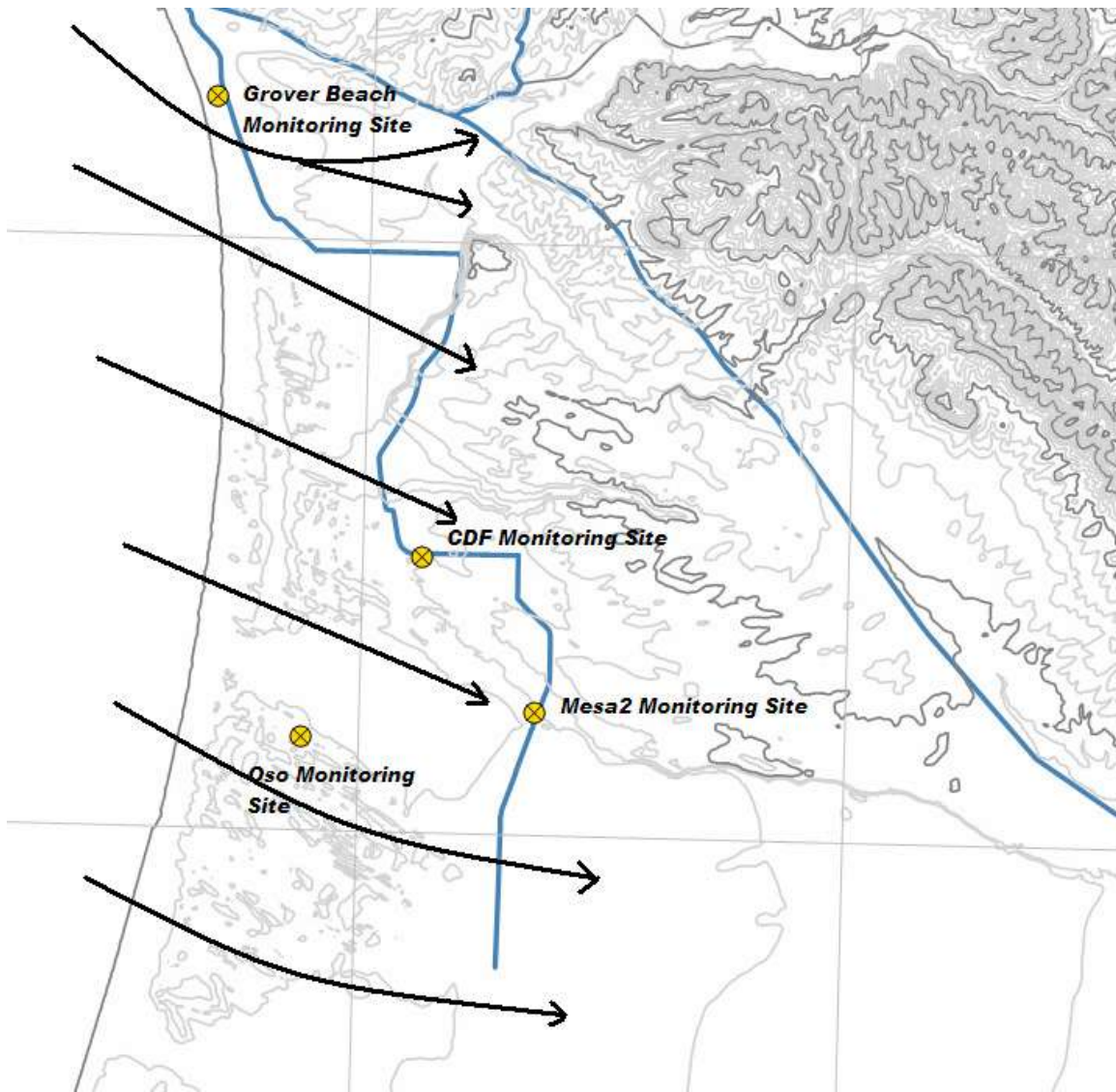


Figure 3.36 – Northwesterly Wind Pattern in Study Area

The Grover Beach and CDF sites have significant terrain downwind that will slow the winds and, in some cases, channel the direction. The Oso site and, to a lesser extent, the Mesa2 site do not have significant downwind terrain, so the winds there are relatively unimpeded and the pressure gradients draw the air mass directly inland.

Surface wind measurements are normally performed at the standard sensor height of 10 meters above ground level; however both the CDF and Oso study sites had wind sensors installed at non-standard heights. At the CDF site, State Parks representatives expressed concern that the wind sensors were to be mounted on an existing tower at 10 meters height while the PM₁₀ inlet would be located about 35 feet away at a height of approximately 3.5 meters. While it is extremely unlikely that wind conditions or PM concentrations would vary over such a short distance, in order to address their concern, an additional tower was installed at the PM₁₀ monitoring location and the wind sensor height was lowered to 7 meters. For the Oso monitoring station, its remote location prevented access for the equipment needed to install a 10 meter tower; the wind sensors were thus mounted per factory configuration on the EBAM support tripod at a height of about 2 meters.

The wind speed data from Oso and CDF can be adjusted by using the power law to approximate the speed that would have been measured if the sensors had been mounted at the standard 10 meter height (2). Tests were performed that clearly demonstrate the power law provides an accurate correction of the 2 meter sensor height used at Oso to the standard 10 meter height. This test is described in detail in Appendix A. Figure 3.37 below presents a comparison of daily maximum hourly wind speed (unadjusted) relative to the speeds at Grover Beach. Figure 3.38 below presents the same comparison with the Oso and CDF data adjusted using the power law.

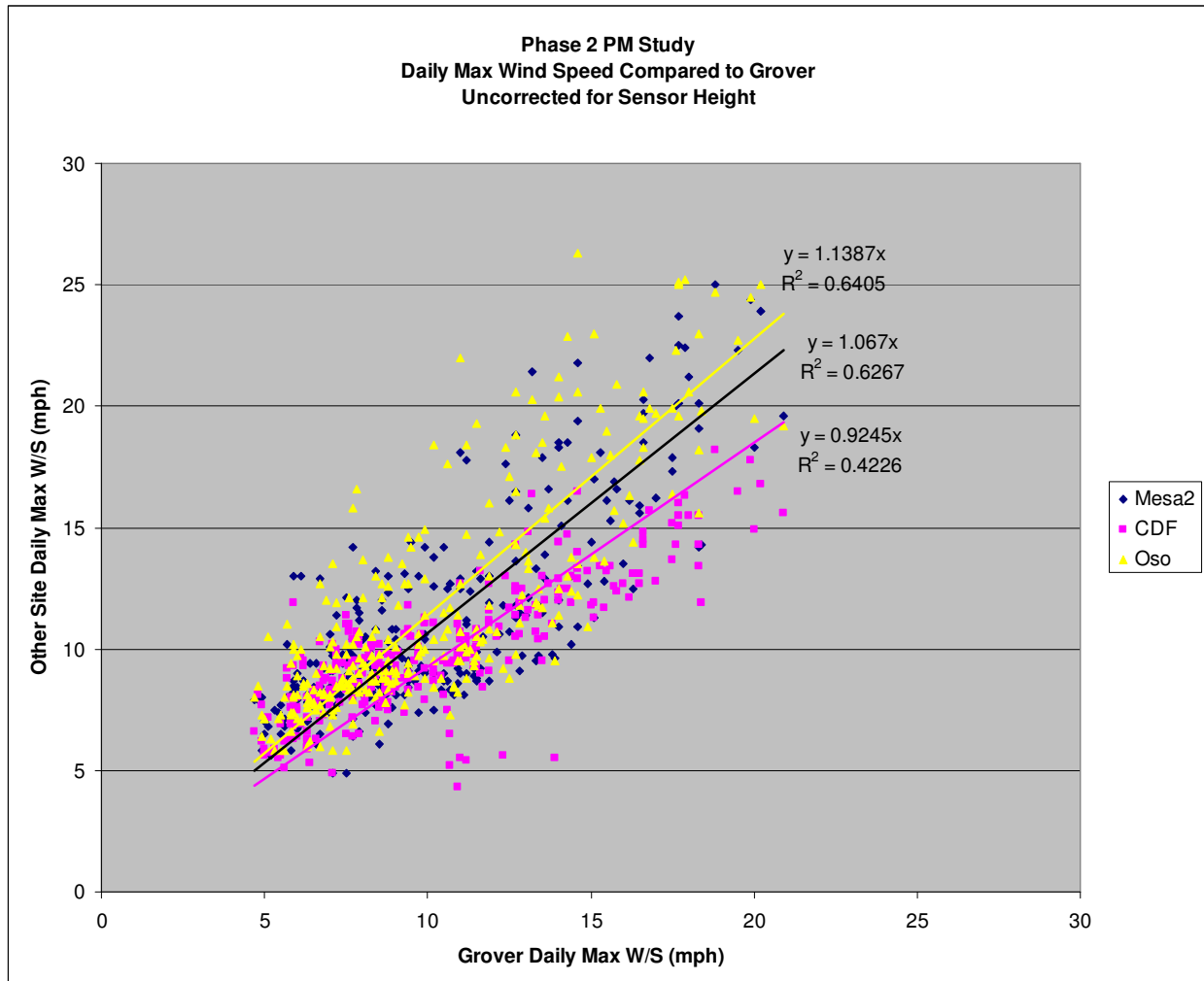


Figure 3.37 – Uncorrected Hourly Daily Maximum Wind Speed Compared to Grover Beach

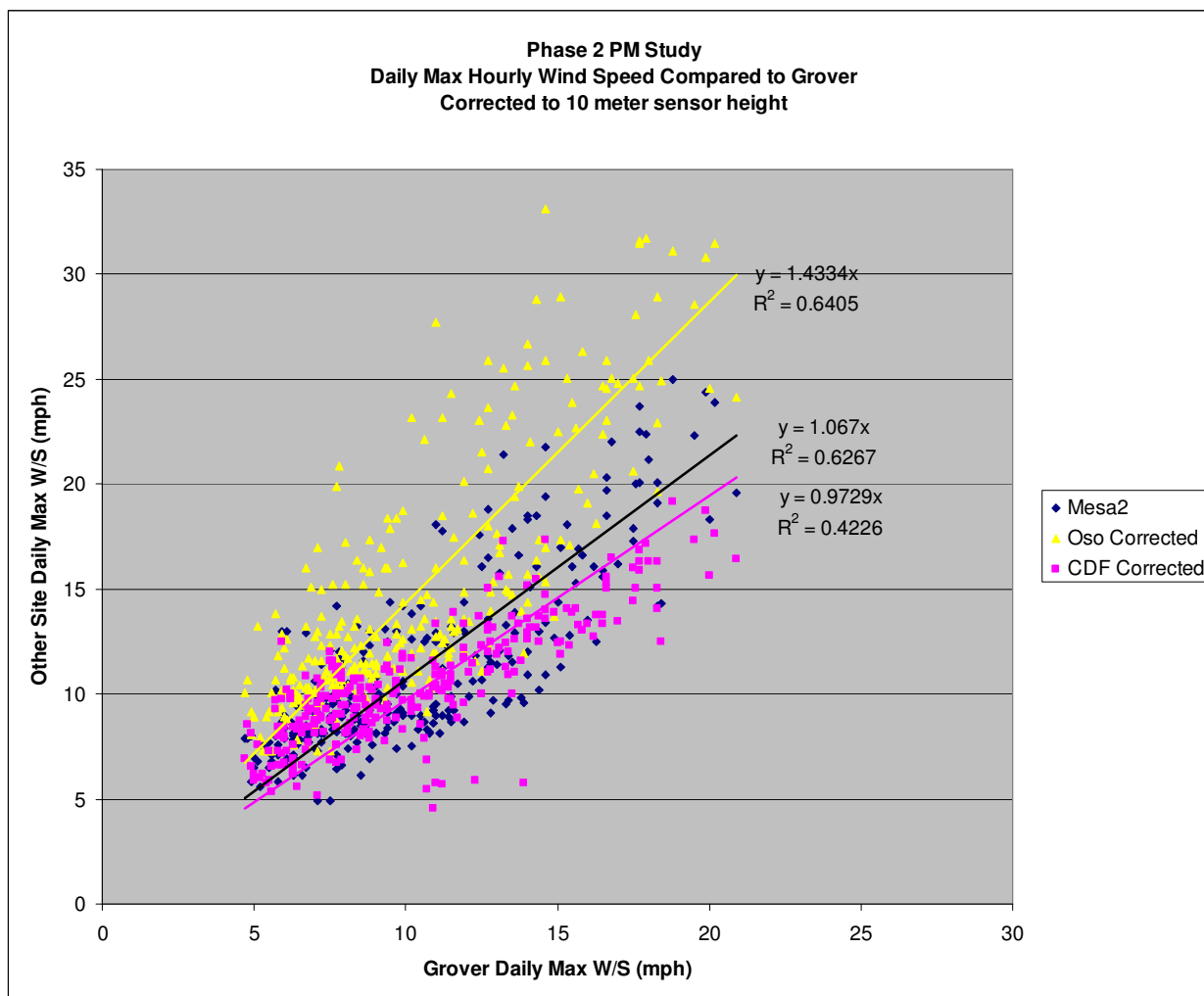


Figure 3.38 – Corrected Hourly Daily Maximum Wind Speed Compared to Grover Beach

The linear regression performed on the data corrected for sensor height shows that, on average, the maximum wind speeds at CDF are about 3% lower than Grover Beach; conversely, maximum winds at Mesa2 and Oso are about 7% and 43% greater, respectively, than Grover Beach. This data clearly demonstrates that the maximum wind speeds increase significantly at the mouth of the Santa Maria Valley as compared to other coastal locations to the north. It is unclear if this pattern is due to slowing of the air mass upwind by the Irish Hills, the effect of downwind terrain, and/or some other factor or a combination of factors. Nonetheless, this pattern is also seen in other historical data sets from monitoring performed throughout this area (6); thus, while the exact cause is not clear, this wind pattern is well documented.

3.1.2. Analysis of Wind Speed and Direction on Episode Days

Review of hourly PM_{10} , wind speed, and wind direction data from the Phase2 study reveals a consistent pattern on episode days (high PM_{10} days) that was not apparent in the Phase1 study, which only utilized the traditional 24-hour average PM_{10} measurements. Figures 3.39 through 3.42 below presents digital strip charts for 3/29/09, a typical episode day; figures 3.43 through 3.46 shows digital strip charts for 3/28/09, a typical non-episode day. Note that the Oso and Dune Center plots are using hourly averaged data, while the other sites plot minute data. The Oso and Dune Center data systems were not able to collect minute data.

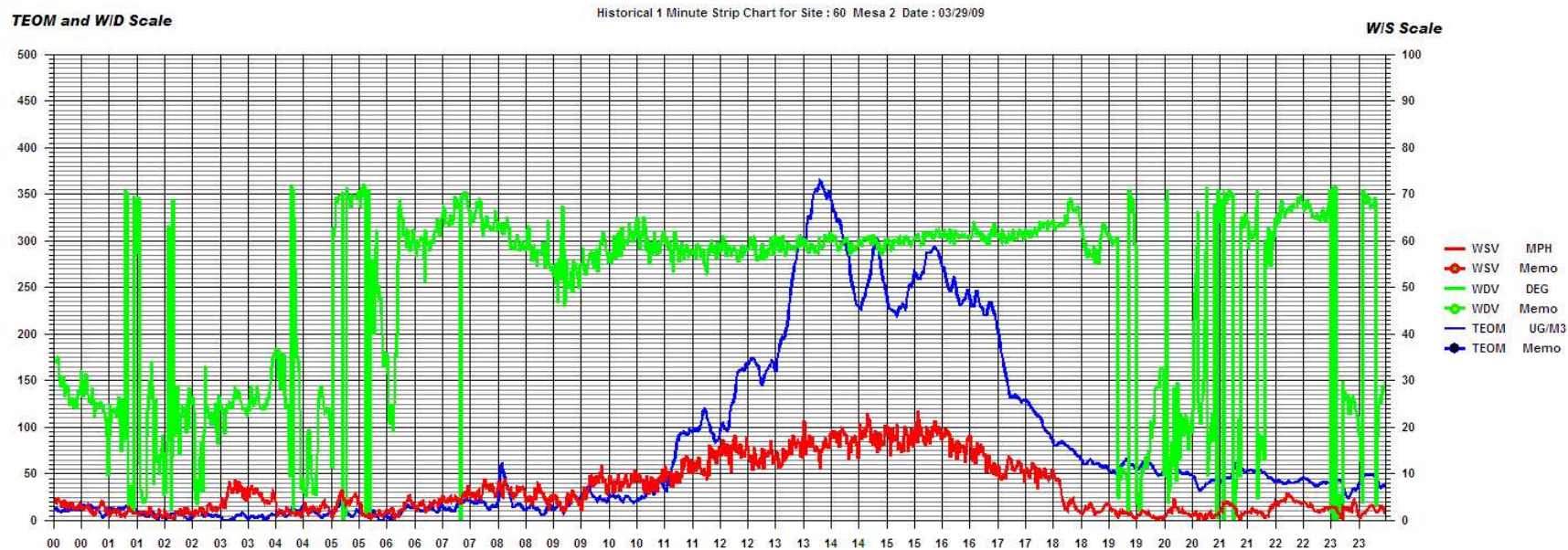


Figure 3.39– Digital Strip Chart for a Typical Episode (High PM10) Day at Mesa2

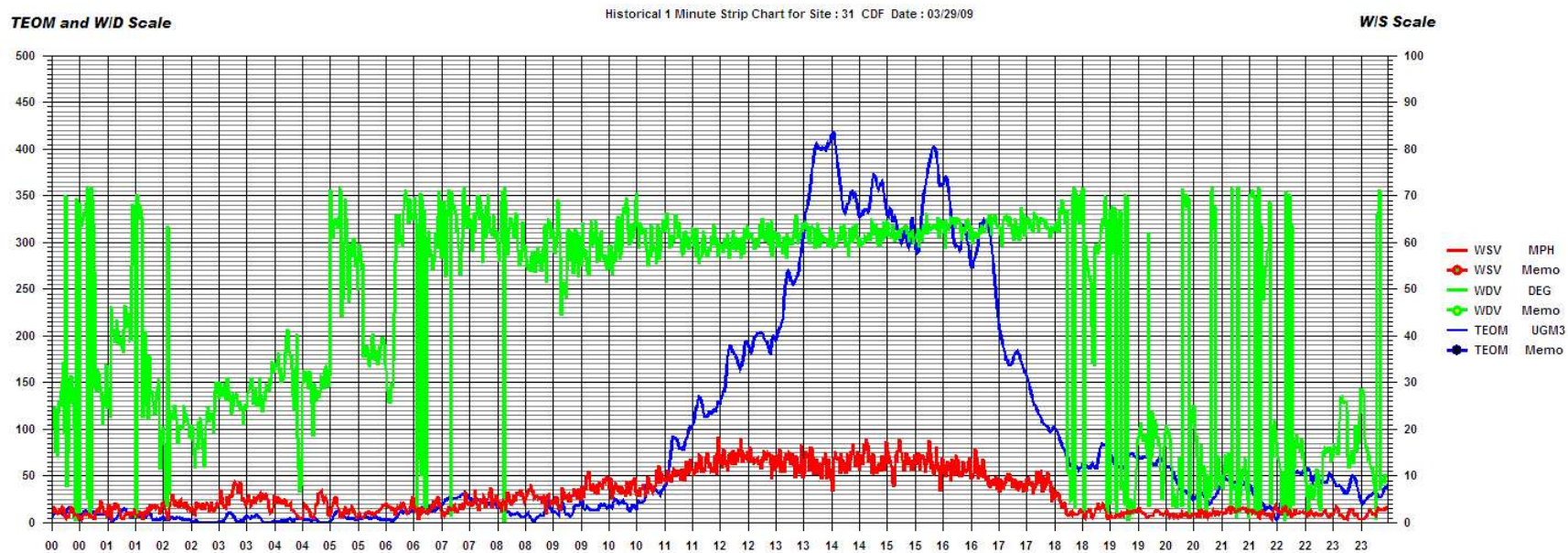


Figure 3.40 - Digital Strip Chart for a Typical Episode (High PM10) Day at CDF

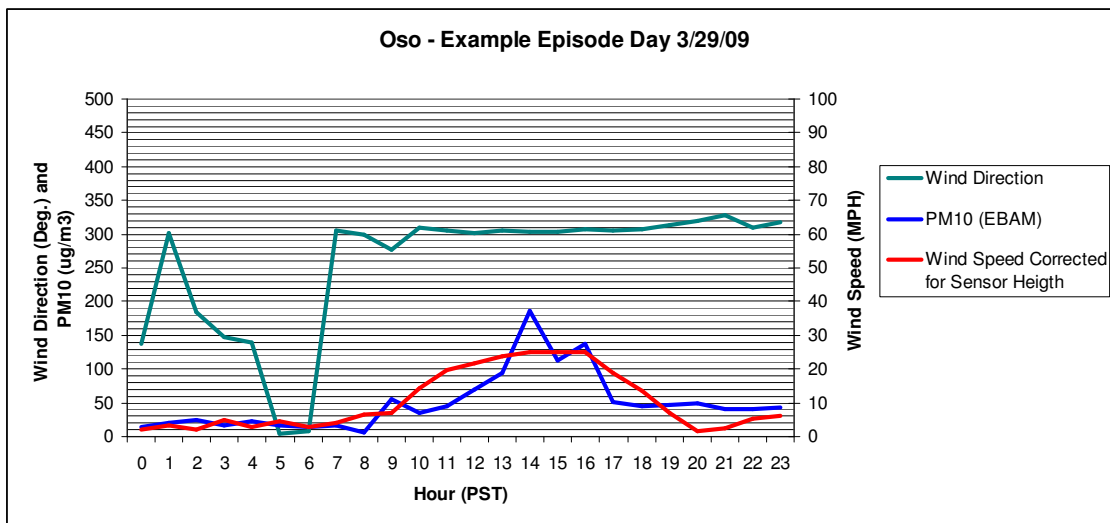


Figure 3.41 - Digital Strip Chart for a Typical Episode (High PM10) Day at Oso

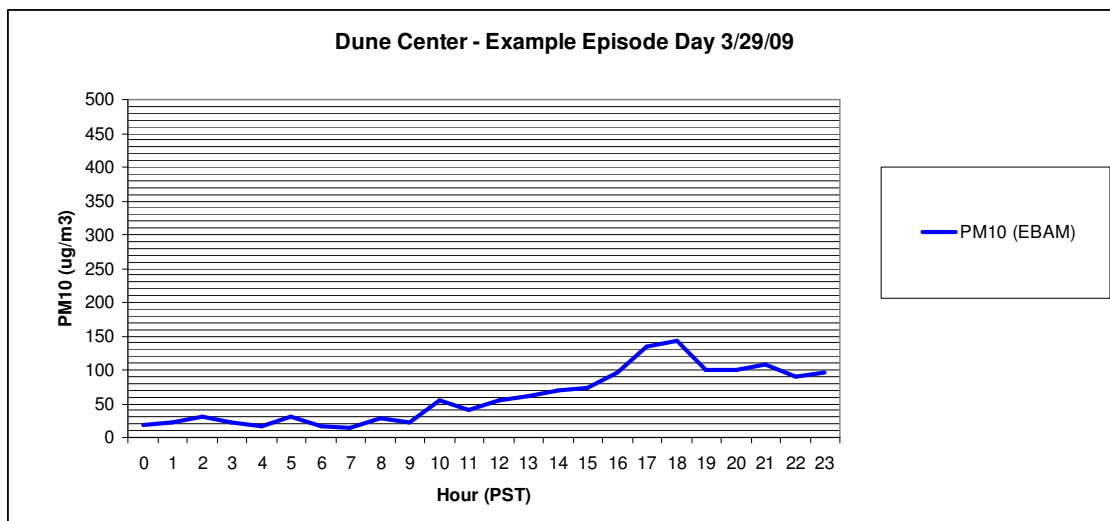


Figure 3.42 - Digital Strip Chart for a Typical Episode (High PM10) Day at the Dune Center

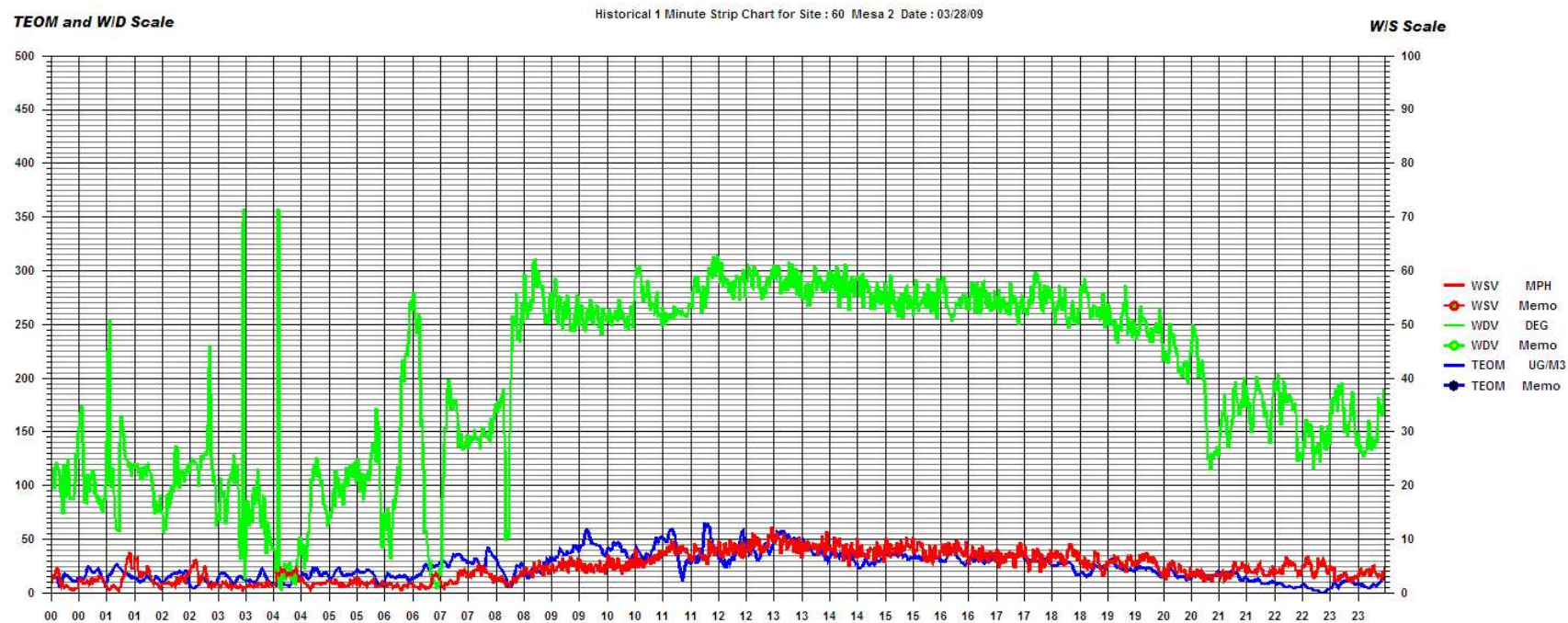


Figure 3.43 - Digital Strip Chart for a typical Non-Episode Day at Mesa2

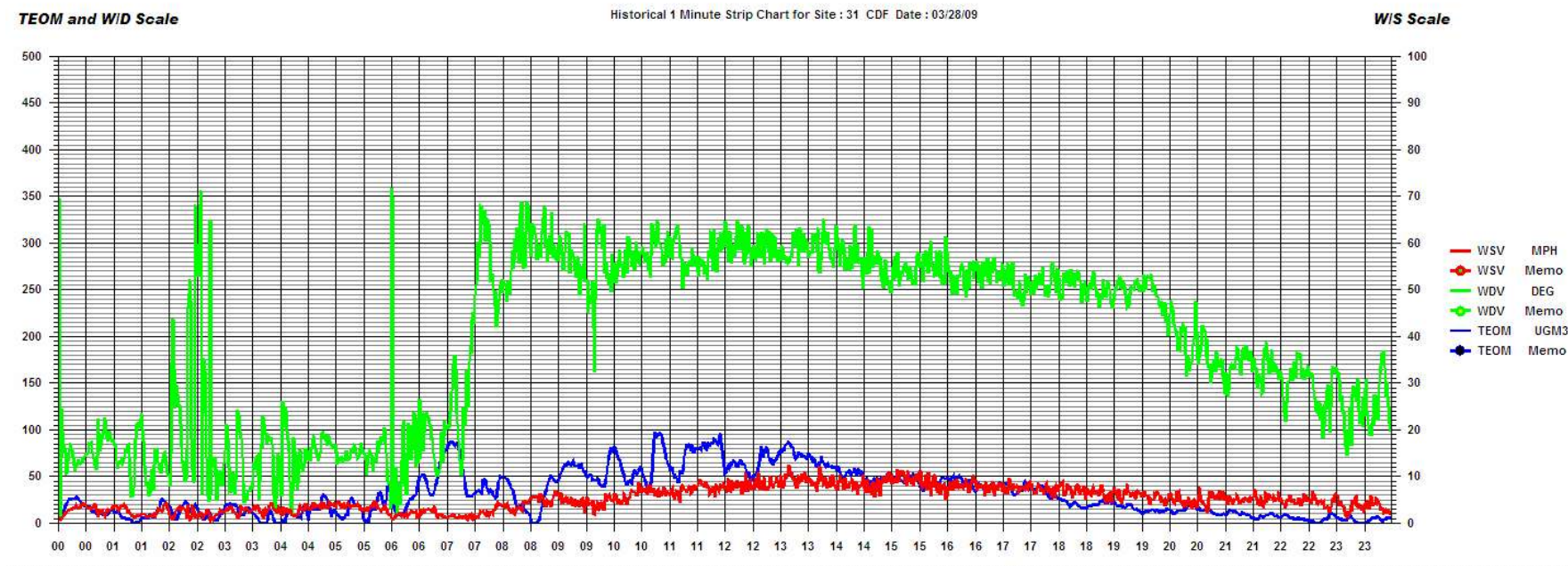


Figure 3.44 - Digital Strip Chart for a typical Non-Episode Day at CDF

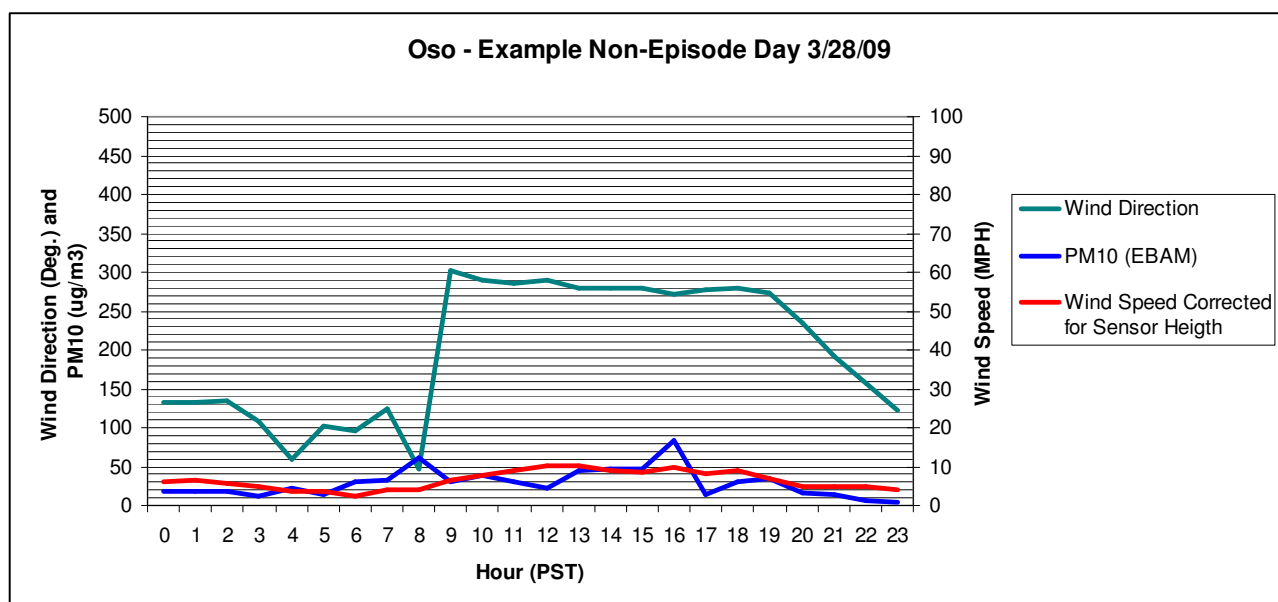


Figure 3.45 - Digital Strip Chart for a typical Non-Episode Day at Oso

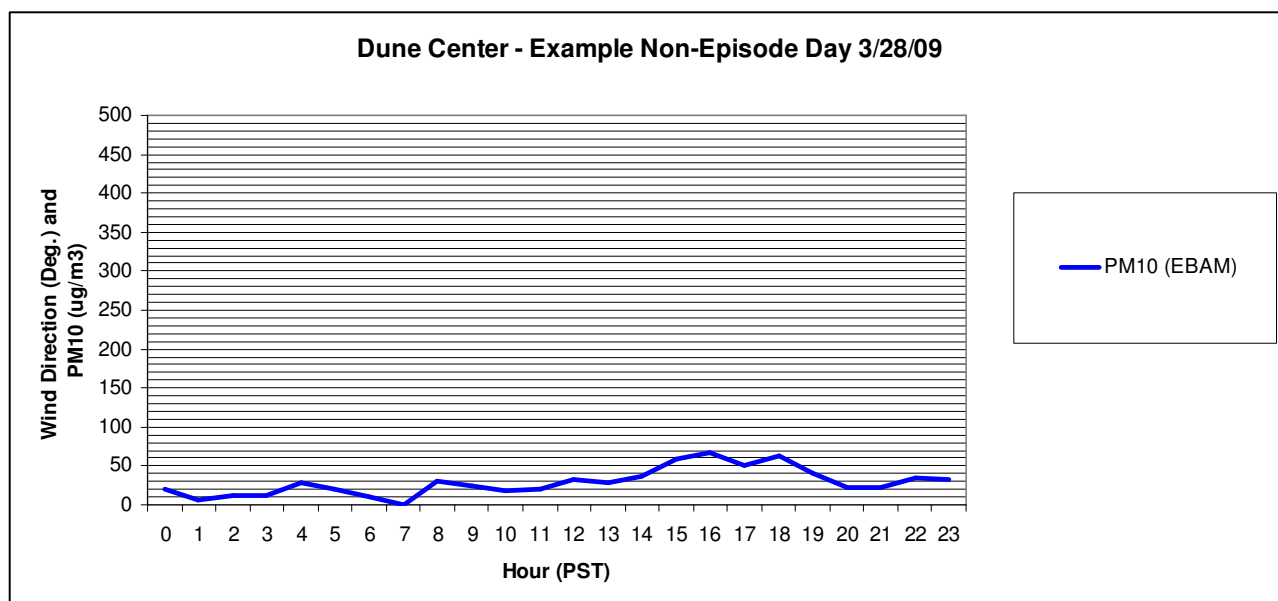


Figure 3.46 - Digital Strip Chart for a typical Non-Episode Day at the Dune Center

Maximum hourly PM_{10} values for all measurements made on these two example days are plotted on a map of the area in figures 3.47 and 3.48 below to show the spatial distribution of PM_{10} concentrations throughout the study area for these two types of days. The higher value for Grover on the non-episode day is due to sea salt artifacts; without the salt artifacts, the Grover concentrations would be similar to the other sites. These two example days are representative of the data for the majority of days sampled in the Phase2 study.

Weather conditions on both of these days begin similarly, with low wind speeds and variable wind directions, mostly from the east. Similarly, the wind direction on both days shifts to a consistent

northwesterly direction in mid-morning and continues until late afternoon. The major difference between the two is that, in the late morning on the episode day the wind speed begins climbing, reaching a maximum hourly average of 13.8 mph at CDF, 18.1 mph at Mesa2, and 25.2 mph at Oso. The wind speed on the non-episode day reaches a maximum hourly average of 9.4 mph at CDF, 8.9 mph at Mesa2, and 10.4 mph at Oso.

Figures 3.15, 3.25 and 3.31 in the previous section present the hourly PM_{10} concentration versus wind direction and speed for CDF, Mesa2, and Oso. These graphs demonstrate that high PM_{10} concentrations usually occur only when the wind is blowing from the northwest at a speed greater than 10-15 miles per hour for CDF and Mesa2, and greater than 20 miles per hour for Oso. This relationship between wind speed, wind direction and PM_{10} concentration is clearly the primary determinant for whether a particular day will be an episode or non-episode day.

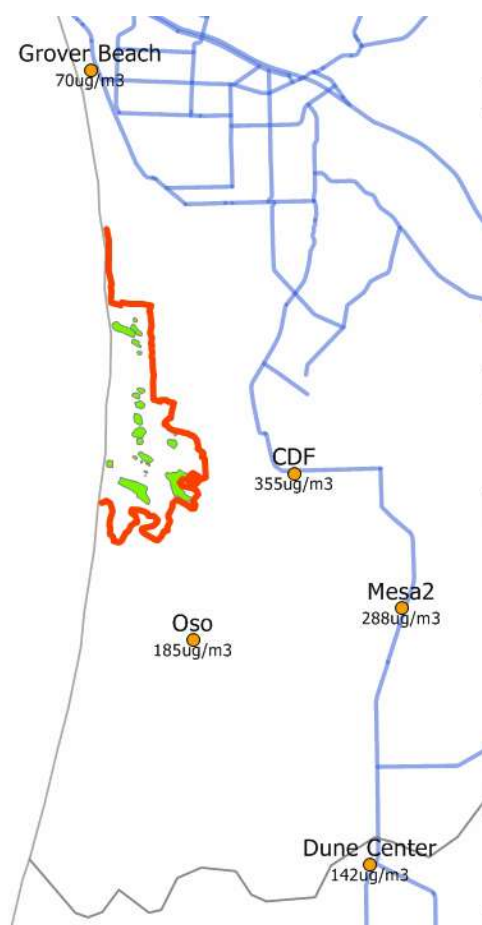


Figure 3.47 – Spatial Distribution of Maximum Hour PM_{10} Concentrations on a Typical Episode Day (3/29/09)

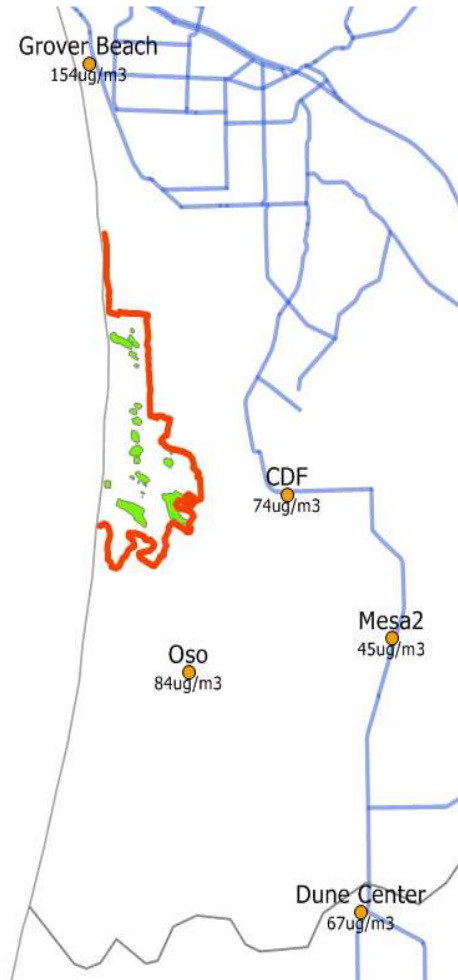


Figure 3.48 – Spatial Distribution of Maximum Hour PM_{10} Concentrations on a Typical Non-Episode Day (3/28/09)

Regarding the source of particulate on episode days, Figure 3.49 below plots the centerline direction (as determined from Figures 3.15, 3.25, and 3.31) of high PM_{10} concentrations for the CDF, Mesa2, and Oso sites. As shown in Section 3.1 above, the Grover Beach dataset clearly demonstrates that, on days with high winds blowing from the northwest, there are no significant sources of particulate upwind of the coast. Thus, the source of wind blown particulates measured at the CDF, Mesa2, and Oso sites is between the ocean and the monitoring station along the trajectories plotted below. All three trajectories pass through significant fetches of open sand sheets, as well as open rangeland with coastal scrub vegetation.



Figure 3.49 – Centerline Direction of High PM_{10} at CDF, Mesa2, and Oso

Review of the study dataset shows the PM_{10} measurements at the Mesa2 and CDF monitoring stations are closely correlated, as shown in Figure 3.50 below. This suggests both stations are measuring a similar source of particulates. Figure 3.50 also shows the CDF PM_{10} values consistently average about 18% higher than Mesa2. This consistent bias suggests the CDF site is closer to the source than the Mesa2 site. This bias pattern between CDF and Mesa2 was also observed in the Phase1 study and other investigations using different monitoring methods. In contrast, Figure 3.51 below shows no correlation between the Grover Beach and CDF PM_{10} measurements, indicating these two stations are not measuring the same source of particulates.

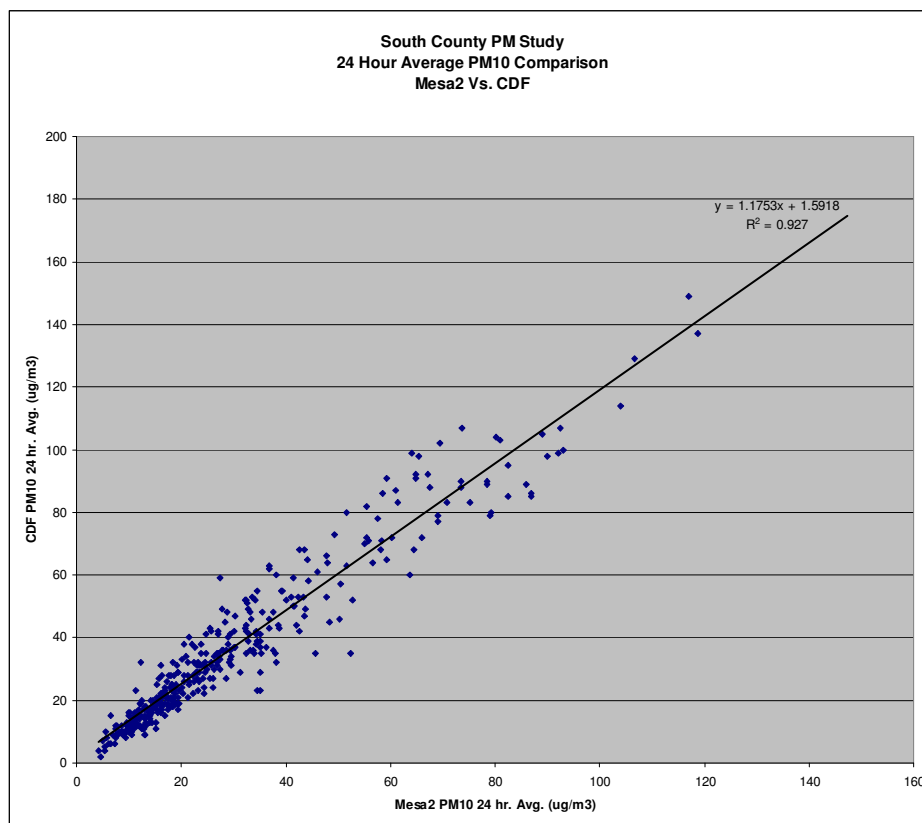


Figure 3.50 – Relationship between CDF and Mesa2 PM₁₀ Measurements

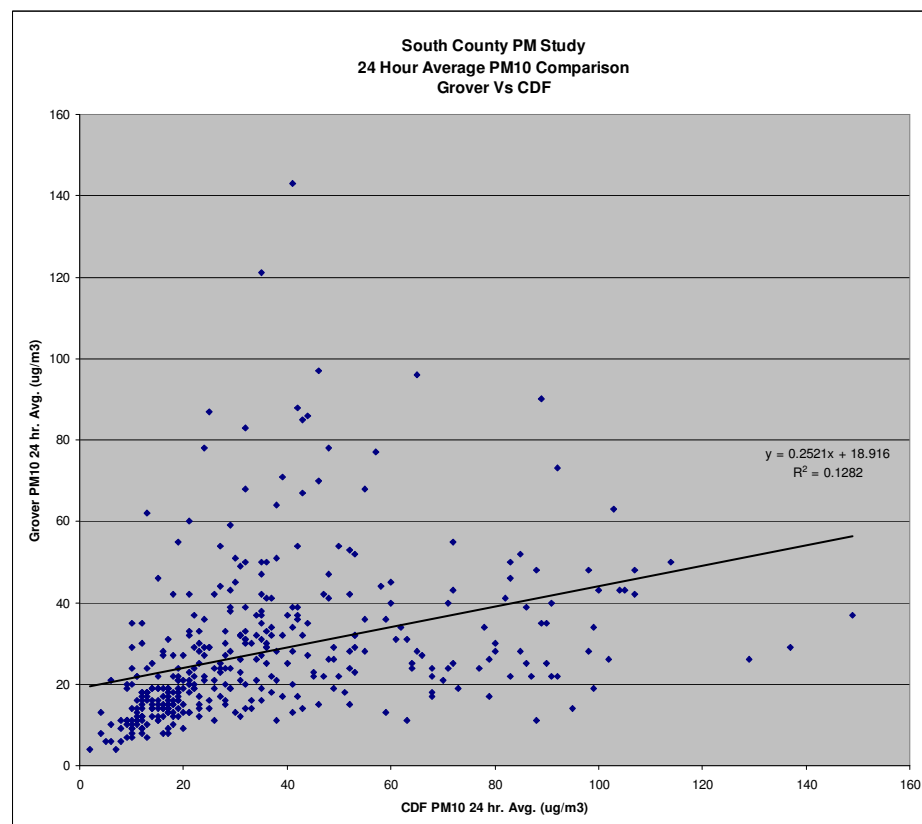


Figure 3.51 – Relationship between Grover Beach and CDF PM₁₀ Measurements

The close relationship between the CDF and Mesa2 PM₁₀ datasets, with the CDF site showing a consistent 18% positive bias, is evidence to suggest that the upwind source of particulate is the open sand sheets and not the open rangeland. The CDF site is 1.5 miles downwind from the SVRA; Mesa2 is 3.1 miles downwind from the SVRA. The physical laws governing atmospheric dispersion of primary pollutants dictate that concentrations decrease with distance from the source. Thus, if the source is the open sand sheets, one would expect the CDF site to record higher PM₁₀ values than Mesa2, as was observed.

Supporting evidence is provided by the numerous measurements of high winds from directions other than the northwest that do not result in high PM₁₀ values. The strongest winds from directions other than the northwest are mostly associated with rain events. However, there are numerous other non-rain event data points with high winds from a direction other than the northwest and low PM₁₀ levels. Figure 3.52 below presents a digital strip chart showing an example of a day where high winds from the north did not result in high PM₁₀ values; yet as soon as the winds shifted to the northwest, the PM₁₀ concentration dramatically increased.

**TEOM and Wind
Direction Scale**

Historical 1 Minute Strip Chart for Site : 60 Mesa 2 Date : 11/04/08

**Wind Speed Scale
(mph)**

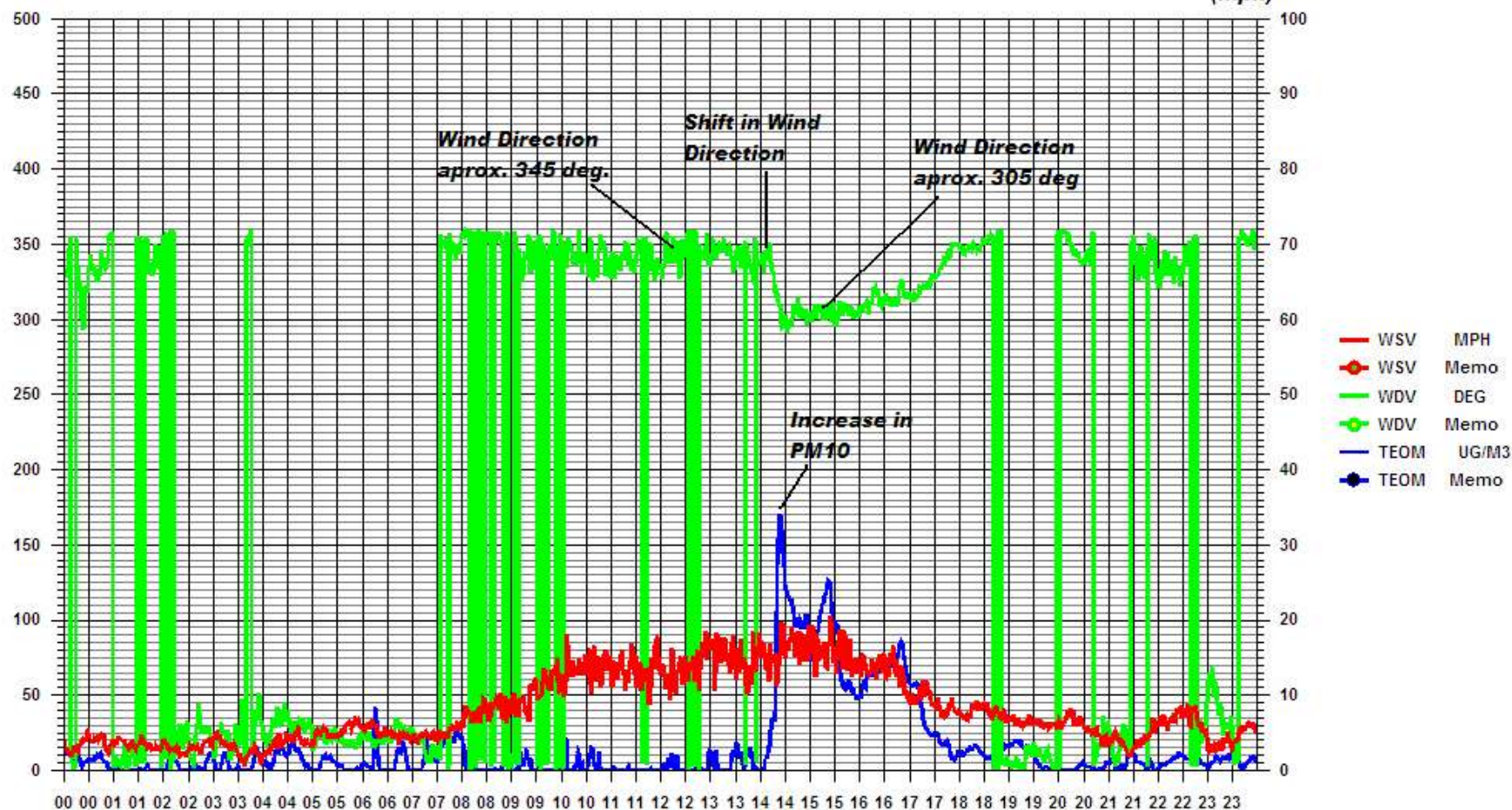


Figure 3.52– Digital Strip Chart from Mesa2 Demonstrating the Effect of Wind Direction on PM₁₀ Concentration

This data further demonstrates that the source of the high particulate levels measured at the Mesa2, CDF and Oso sites is the open sand sheets to the northwest of each site. Periods with winds out of the north-north-west like the example above demonstrate that when the winds are blowing across the open rangeland, but not the open sand sheets, low PM_{10} is measured. This clearly shows that the rangeland is not a significant source of wind blown PM_{10} ; the open sand sheets are the source.

The wind speed necessary to create significant downwind PM_{10} concentrations is different at different locations. Figure 3.53 below presents the relationship between hourly wind speed and PM_{10} concentration from the four monitoring sites with continuous measurements. This chart clearly demonstrates that wind speeds must be significantly higher at the Oso site to cause elevated PM_{10} levels similar to those measured at the Mesa2 and CDF sites. It is also important to note the complete absence of high PM_{10} values at the Grover Beach site under high wind conditions.

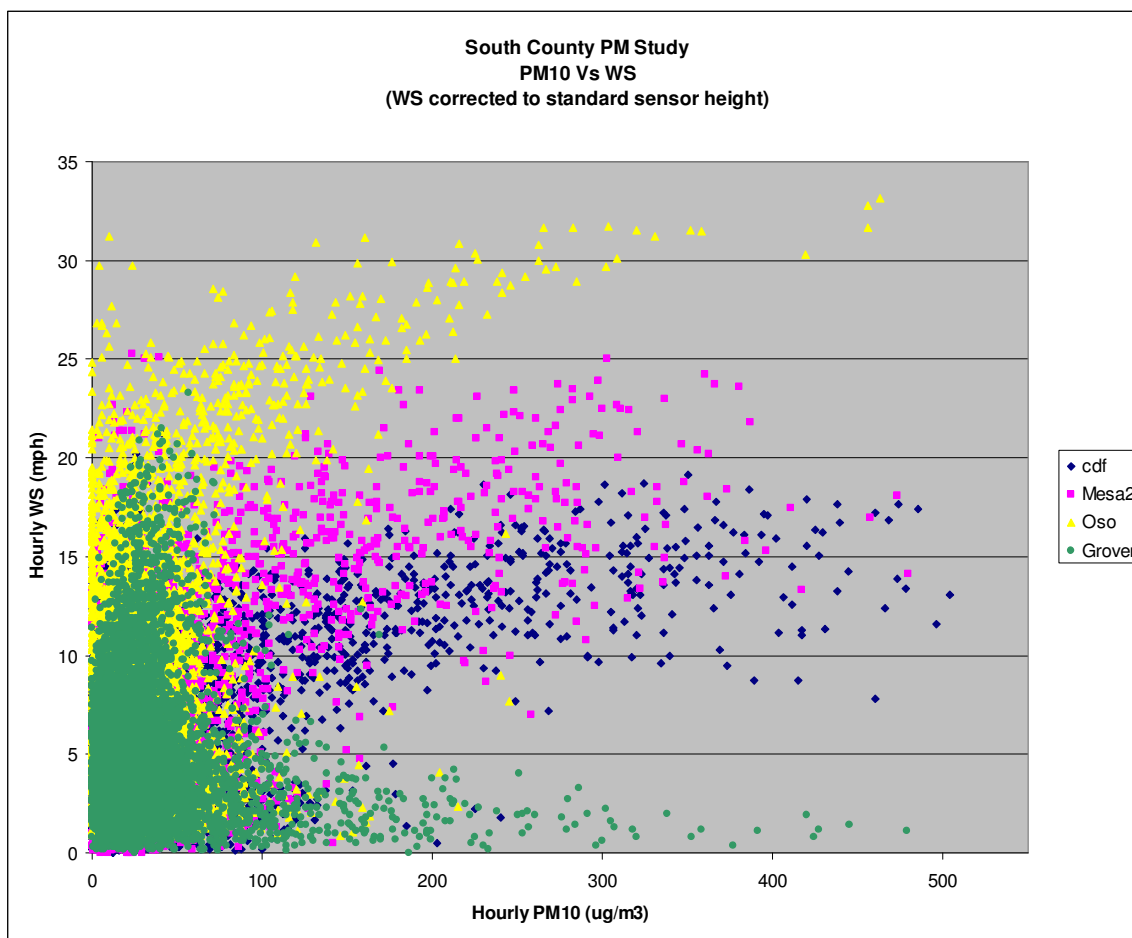


Figure 3.53 – Relationship between Wind Speed and PM_{10}

3.1.3. Comparisons of Downwind PM_{10} Concentrations Between the SVRA and Control Areas

A major component of the Phase 2 study design was to compare PM_{10} measurements downwind from the SVRA to measurements taken downwind of the control site dunes with no OHV usage.

In performing this analysis it is most representative to focus the comparisons on the downwind concentrations observed during the actual hours of PM/wind episodes. To accomplish this, any day where the 24-hour average PM₁₀ concentration at Mesa2 exceeded the state health standard of 50 ug/m³ was classified as an episode day. Data from the three sites for each episode day was then manually examined to exclude hours where the PM₁₀ concentration was below 50 ug/m³, or when winds were calm or did not pass over the sand sheets. The remaining hours for each episode day represent only periods with strong, northwest winds and elevated PM₁₀ levels. The PM₁₀ episode-hourly values for each day were then averaged for each site (the same hours were averaged for all three sites). Finally, each site's daily episode-hourly values were totaled and averaged. Figure 3.54 presents this comparison.

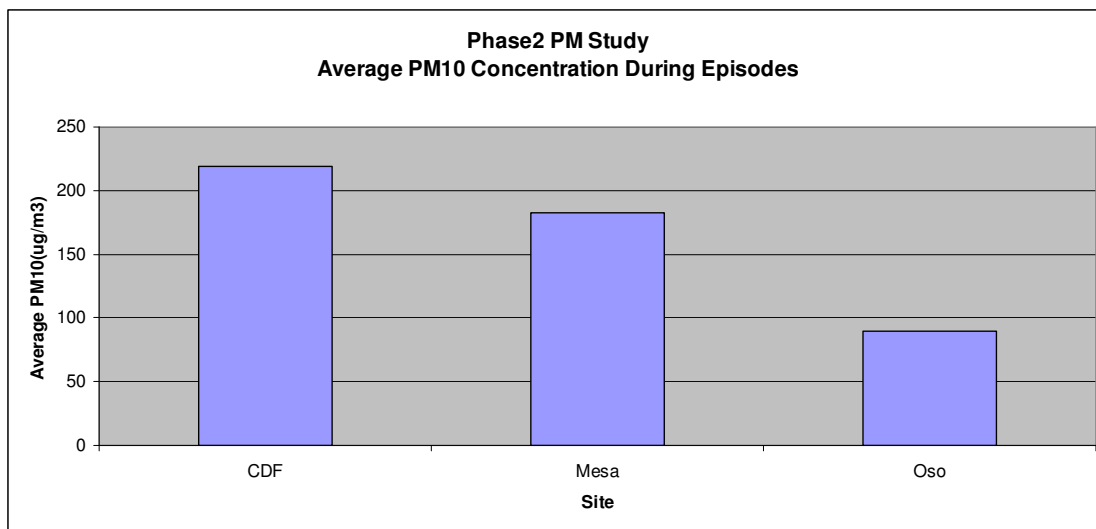


Figure 3.54 – Comparison of Average Downwind PM10 Concentration During Episodes

The chart above clearly demonstrates the Oso control site experiences significantly less downwind PM₁₀ than either site downwind from the SVRA. It is important to note that the lower PM₁₀ levels measured at the Oso site also occurred under much stronger winds than those recorded at CDF and Mesa2, as shown in Figure 3.55 below.

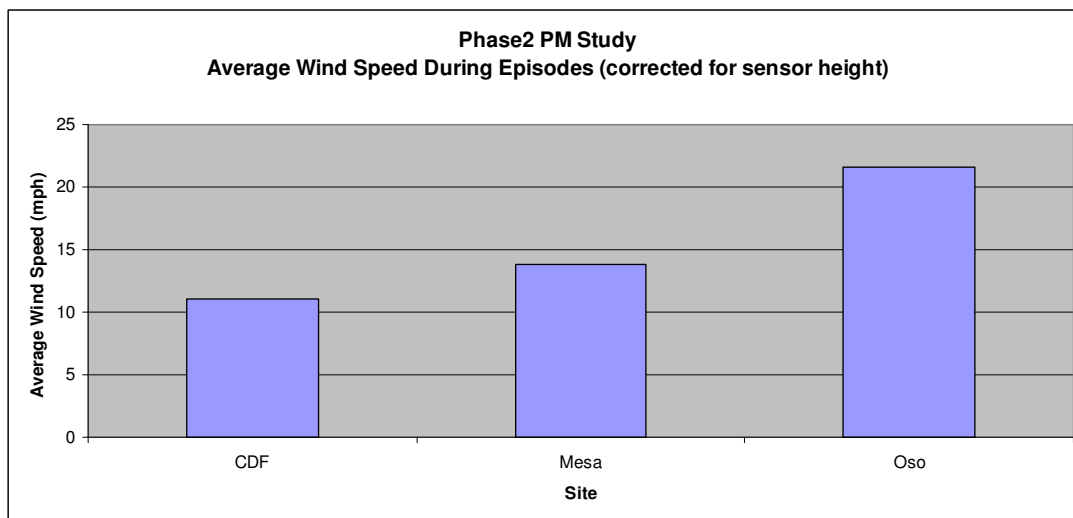


Figure 3.55 – Comparison of Average Wind Speed during Episode Periods

Further analysis of the Oso data shows that elevated PM_{10} concentrations were measured only when winds were considerably above 25 mph; the highest measured wind speed at CDF or Mesa2 for the entire study was 25.3 mph. Figure 3.56 below demonstrates this phenomenon. The two episodes noted on the charts where wind speed was around 25 mph showed very low PM_{10} concentrations at Oso and high levels at CDF. The chart does show an occasional, moderately high PM_{10} spike at Oso (mostly in June) without a corresponding spike at CDF. These only occurred at low wind speeds so are not due to wind blown material; they are likely either sea salt episodes or an artifact due to high moisture conditions.

Figure 3.57 below presents the average downwind PM_{10} concentration from Mesa2, CDF and Oso when the winds are from the northwest and between 10 mph and 25.3 mph (the highest wind speed measured at either Mesa2 or CDF). This presents an approximation of what the PM_{10} levels downwind from Oso would be if the winds were not significantly stronger than those that occur downwind from the SVRA.

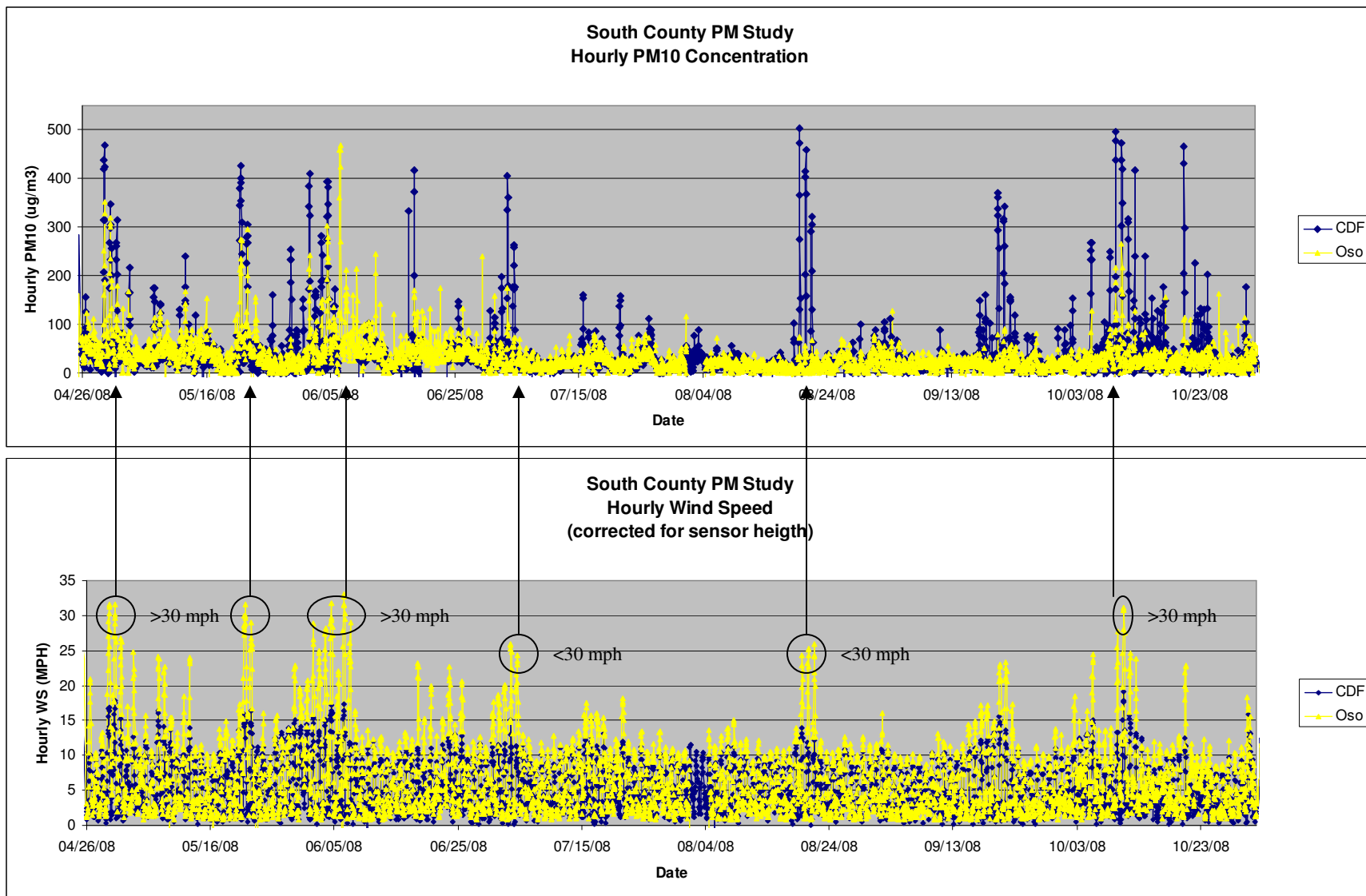


Figure 3.56 - Relationship between Wind Speed and PM Episodes at Oso and CDF

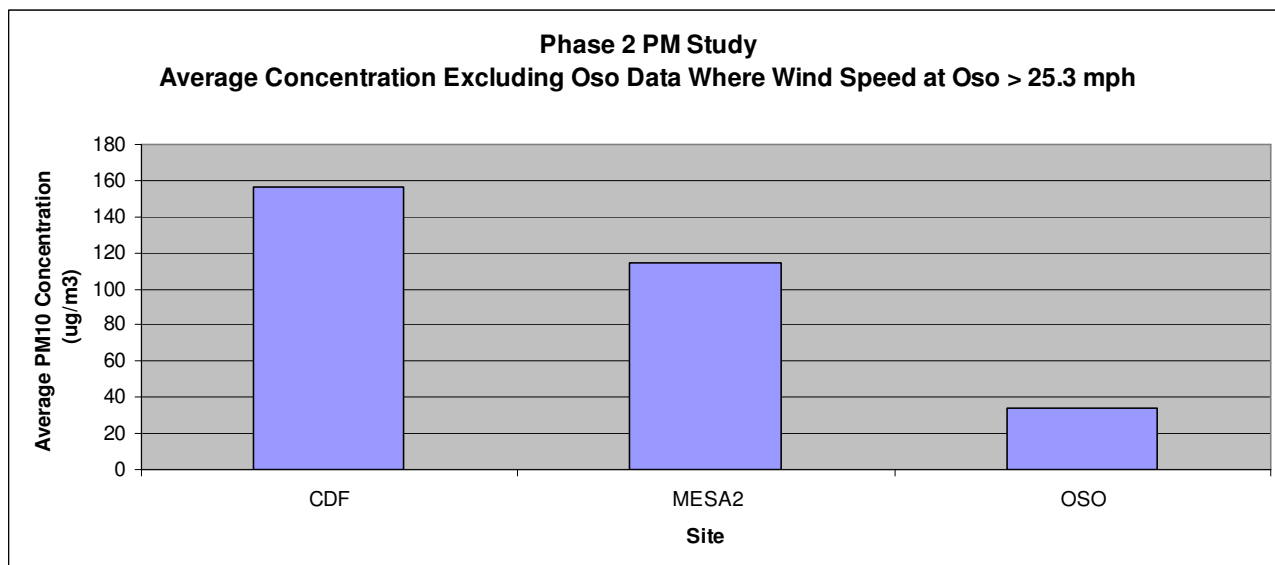


Figure 3.57 – Estimate of Episode Concentrations When Wind Speed is Less than 25 MPH

Late in the Phase2 study, SLOAPCD decided to perform PM₁₀ measurements farther downwind from the Oso site at the Dune Center, which represents a control site a similar distance to the ocean as the Mesa2 site that is downwind from the SVRA. Data was only gathered at the Dune Center for about 3 weeks in March 2009. Figure 3.58 below presents the average PM₁₀ concentration for episode periods when the Dune Center monitor was operational, while Figure 3.59 presents a time series plot of the hourly PM₁₀ data for that period.

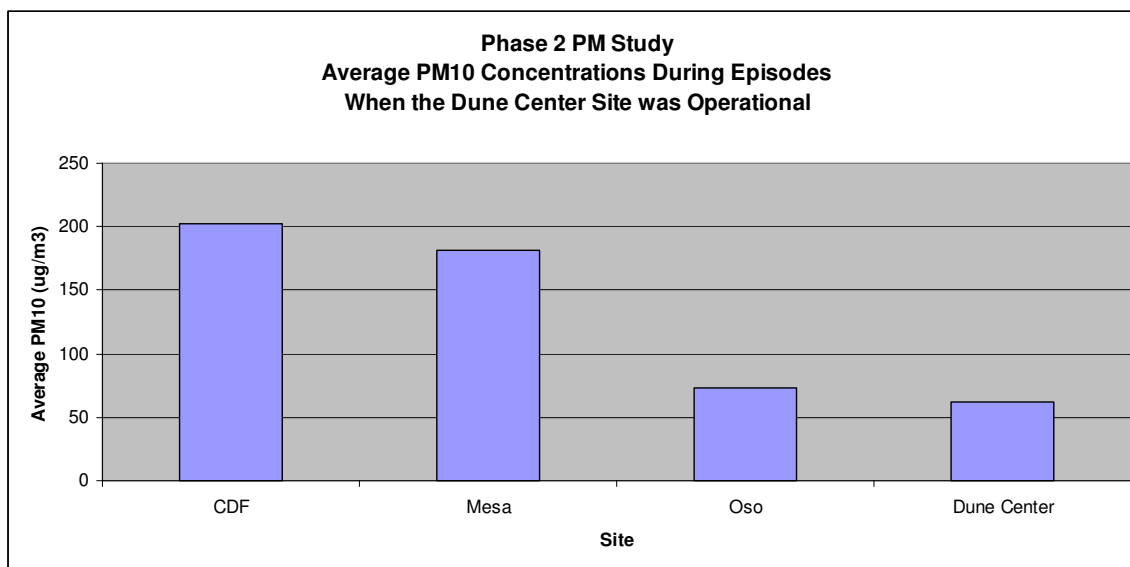


Figure 3.58 - Comparison of Average Downwind PM10 Concentration for Episode Periods when the Dune Center Monitor was Operational

As shown in both charts, the Dune Center PM_{10} values are less than measured at Oso and significantly less than the PM_{10} values seen at Mesa2. Figure 3.59 below also demonstrates the close correlation of the elevated readings from Mesa2 and the CDF monitoring sites compared to the control sites. Since the sand sheets downwind of each monitoring site appear to be the primary source of particulate on episode days, differences in those sand sheets must be responsible for the significant differences in PM_{10} levels measured at CDF and Mesa2 compared to the control sites. The primary difference between the sand sheets is the presence of OHV activity on the SVRA dunes upwind of CDF and Mesa2.

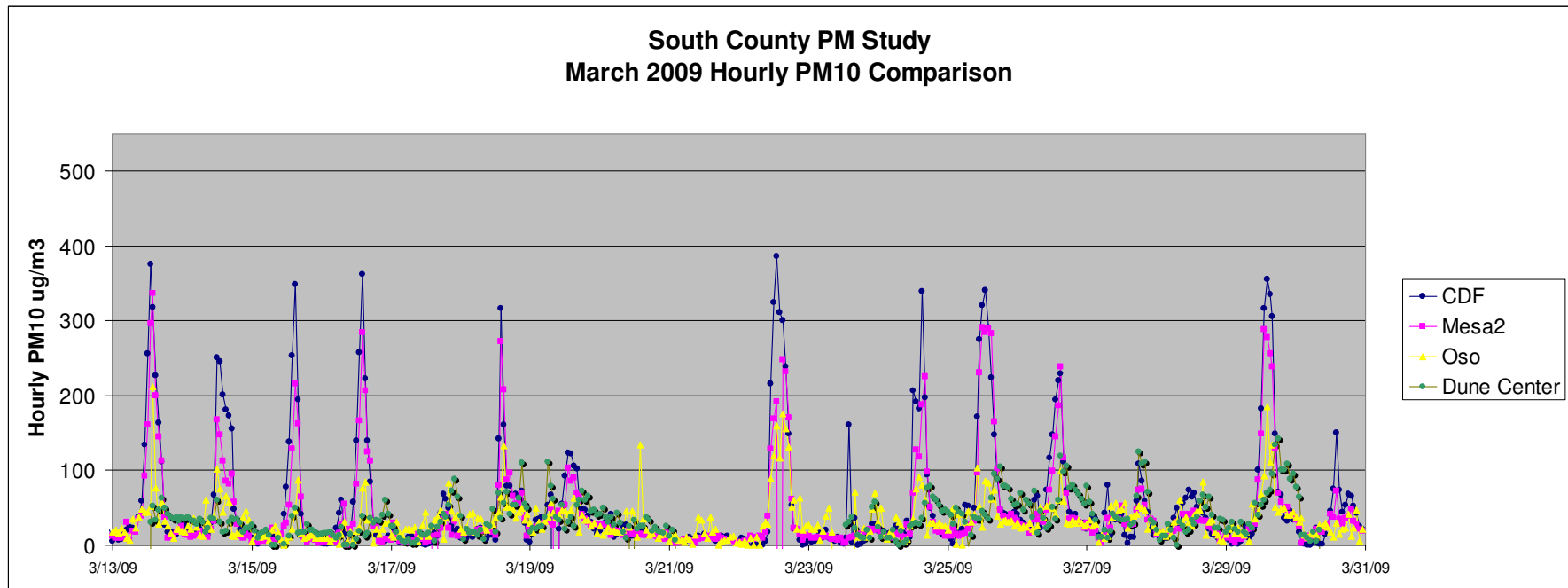


Figure 3.59 – Hourly PM10 From CDF, Mesa2, Oso, and the Dune Center

3.1.4. Contributing Factors Other Than Wind

Close examination of Figure 3.53 above shows that, for each site (other than Grover Beach), there is a threshold wind speed where elevated PM_{10} values begin to occur. In general, as wind speed increases PM_{10} also increases. However, Figure 3.53 shows that for any particular wind speed above the threshold where PM_{10} values become elevated, the range of hourly PM_{10} concentrations is quite variable. This indicates that, while wind speed and direction are the primary determinants of PM_{10} levels in this region, there are likely other variables that can influence just how high the PM_{10} concentrations will reach during a wind episode.

To investigate other potential variables that may affect PM_{10} concentrations during a wind episode, hourly PM_{10} data collected at Mesa2 and CDF under northwest winds and a narrow range of hourly wind speeds were selected for the evaluation. Two wind speed ranges were tested where episodes occur with enough frequency to have sufficient data points to evaluate: 16.0-16.9 mph and 20.0 – 20.9 mph. The 16-16.9 mph range is at the lower end of northwest wind speeds where episodes occur, while the 20-20.9 mph wind speed range was selected to represent the higher range of episode wind speeds. In performing these comparisons it quickly became clear that some of the hours within each range spanned either the beginning or end of an episode, where only part of the hour was affected by the episode. These partial hours were excluded, so that only hours where both the wind speed and PM_{10} was at or near the maximum for that day's event were included for analysis. In addition, any data on a day with rainfall or the day following rainfall was excluded.

In this evaluation, factors such as temperature, and humidity were tested for a correlation to PM_{10} concentration at both wind speed ranges. Close examination of these datasets shows a weak but clear connection between temperature and PM_{10} at Mesa2 and CDF. Figures 3.60 and 3.61 below present this relationship for Mesa2 for both wind speed ranges tested. Figure 3.62 below presents this relationship for CDF for the 16.0-16.9 mph range; not enough data points were available at the higher range at CDF to perform this analysis. Because temperature was not measured at CDF, Mesa2 temperature was used for the CDF analysis.

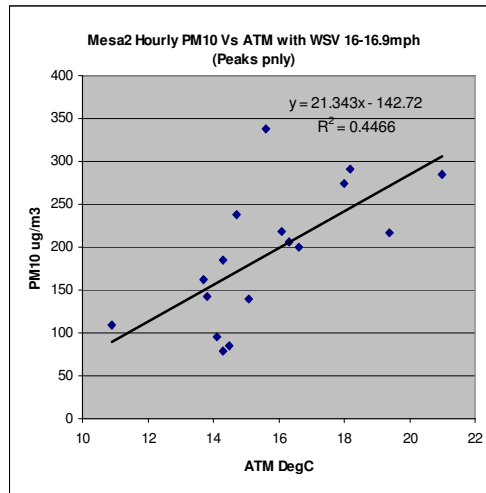


Figure 3.60 – Relationship between PM₁₀ Episodes and Temperature

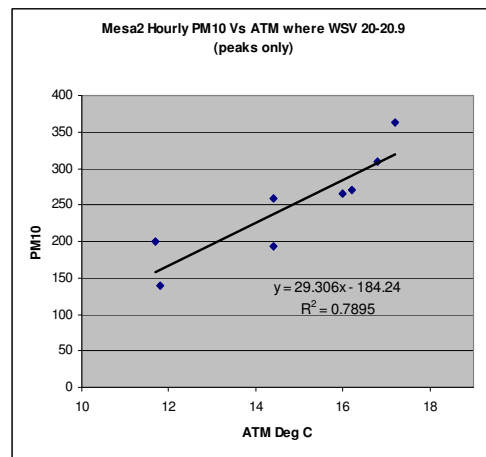


Figure 3.61 – Relationship between PM₁₀ Episodes and Temperature

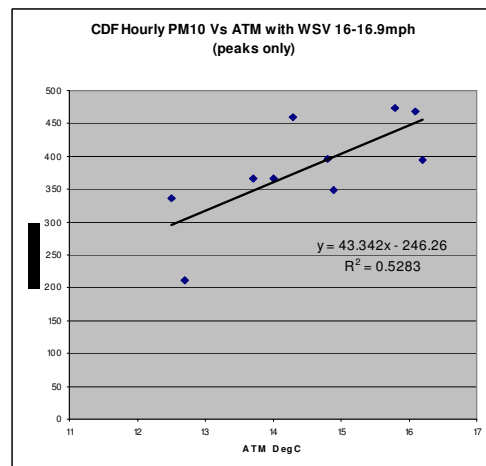


Figure 3.62 – Relationship between PM₁₀ Episodes and Temperature

Care must be taken in evaluating any indirect variable such as temperature in terms of its relationship to particulate levels during episodes. An indirect variable, such as temperature could be related to another factor which correlates to both variables. However, the connection between temperature and PM₁₀ concentration for similar wind speeds makes sense for a wind blown crustal source. Most days on the dunes begin with moisture on the sand surface from the moisture-laden marine air. On cold days moisture on the surface likely remains higher in the afternoon when the wind events occur than on hotter days with more evaporation potential. So, while wind speed and direction play the most important role in determining PM₁₀ concentration, the temperature characteristics of the air mass may contribute as well.

Rainfall also has a major effect on PM₁₀ concentrations observed during the study, as would be expected. Figure 3.63 below plots the 24-hour average PM₁₀ values and 24-hour rainfall totals from Santa Maria NWS station. On all days with more than trace rainfall, PM₁₀ values were very low.

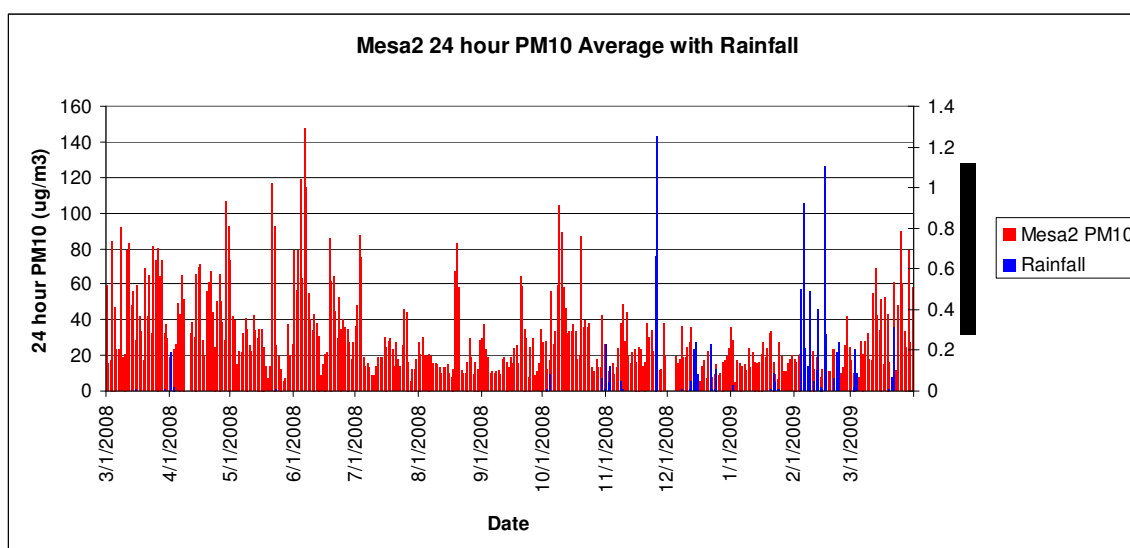


Figure 3.63 – Mesa2 24-hour PM₁₀ and 24-hour Rainfall at Santa Maria NWS

SVRA Attendance Analysis

Comparison of control site to non-control site data in Section 3.2.3 showed significantly higher PM₁₀ concentrations downwind from the SVRA, with this difference likely due to OHV activity. As discussed in Section 1, it is possible for the OHV activity in the SVRA to cause direct PM emission impacts from fuel combustion exhaust and/or dust plumes caused by vehicles driving on the dunes. Indirect impacts may also occur from vehicle activity causing de-vegetation, changes to the structure of the dunes and other impacts that make it easier for fine sand particles to become airborne during a wind event.

In order to assess if there are any direct PM impacts from the OHV activity in the SVRA an analysis was performed comparing activity in the SVRA to observed PM₁₀ concentrations. The level of actual OHV activity is not measured or recorded, but the number of vehicles entering the SVRA is recorded by State Parks personnel. Figure 3.56 plots the relationship between daily PM₁₀ levels at Mesa2 and daily number of vehicles entering the SVRA; the data shows no statistical correlation between the two. This is not surprising given the predominant role of wind speed and direction in determining PM₁₀ concentrations.

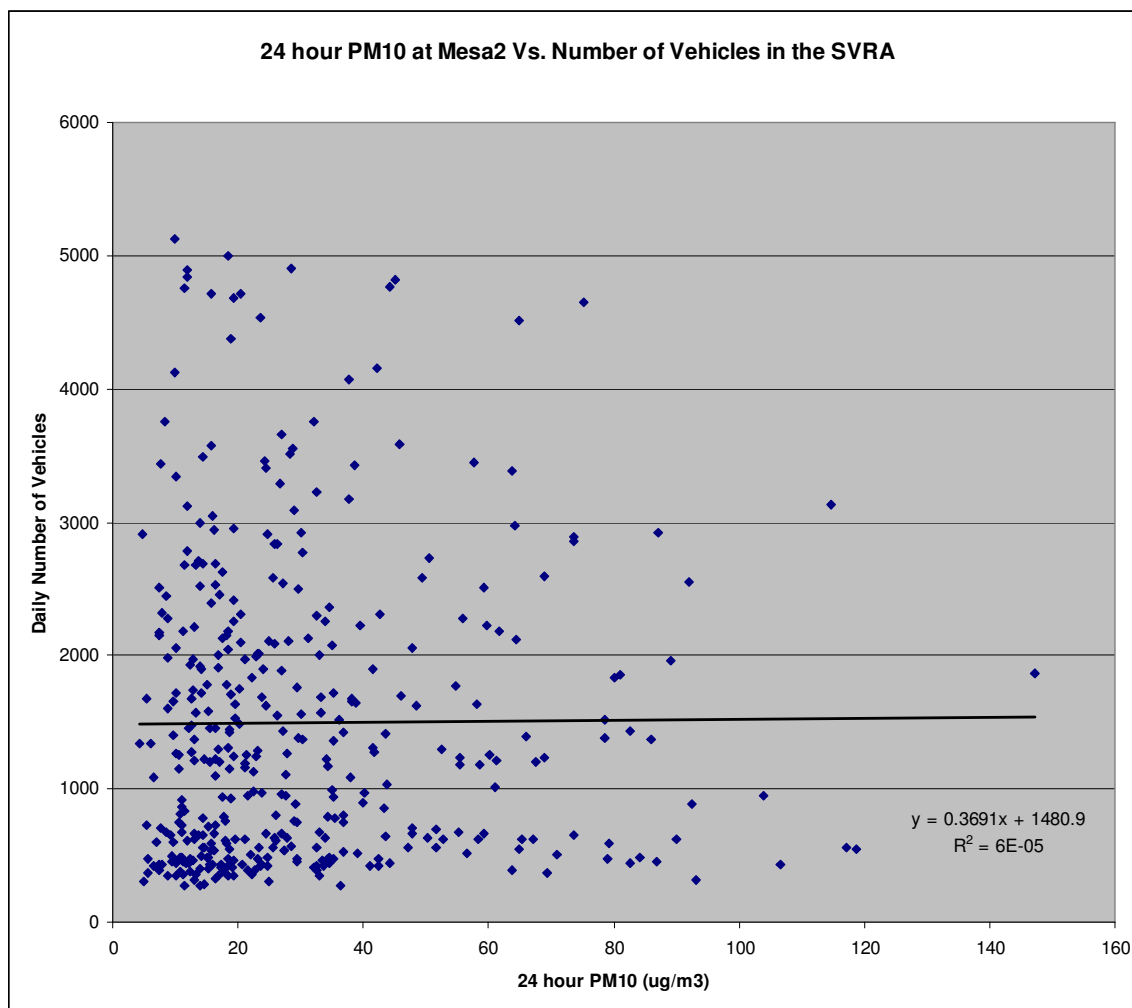


Figure 3.64– PM₁₀ Concentration as Compared to Number of Vehicles in the SVRA

Averaging of the data may allow the strong correlation with winds to get averaged out and possibly show a relationship between the number of vehicles entering the SVRA and PM₁₀ concentration downwind. Averaging weekend versus weekday values is a common technique used in air quality analysis to determine if different activity levels are a factor in pollutant levels. Since there are actual records of activity level, rather than use weekend/weekday averaging, a better approach is to average the highest activity days and the lowest activity days and see if there is a significant difference in average PM₁₀ concentration downwind from the SVRA. Table 3.2 below summarizes the highest and lowest 50 days of SVRA activity based on number of vehicles entering the SVRA.

One must be cautious in using averaging to cancel out other variables. If the sample size is too small, the natural randomness of the dominant variable(s) (i.e., wind speed) can bias the averages. This could make it appear that vehicle activity is affecting the PM₁₀ concentrations when, in actuality, the sample size is too small to allow the dominant variable to be fully averaged out, causing a bias in the averages. In this analysis however, the Oso site provides a control that can be used to assess if factors other than vehicle activity are causing a bias to the averages.

Table 3.2 below shows the PM₁₀ average concentration downwind from the SVRA on high OHV activity days is higher than the average PM₁₀ concentration on low activity days. However, at the Oso control site, the reverse is true, with PM₁₀ concentrations being lower on high activity days. Because activity levels in the SVRA have no affect in the Oso control area, the Oso averages in Table 3.2 reflect a control that represents the likely affect of variables other than SVRA activity on the PM₁₀ averages.

In order to assess if these average differences are indeed statistically significant, the Student T test was performed on these data. The results of the Student T test are presented as the confidence interval (1-P) in Table 3.2. It is generally accepted that a confidence interval greater than 95% indicates statistical significance (5). Mesa2 averages meet this threshold, indicating that the difference between the average concentration for the highest and lowest activity days is real and not an artifact of the randomness of the data. However, the 95% confidence is not met for the CDF or Oso data, indicating no statistical difference between the highest and lowest activity averages for those sites.

Showing no statistical difference between high and low activity days for Oso is expected because the activity in the SVRA should have no impact on PM₁₀ levels at the Oso site. However, finding no statistical difference between the lowest and highest activity days at CDF, yet finding a statistical difference at Mesa2 appears a bit contradictory. Close inspection of the dataset shows that there is a handful of missing data points at CDF in these averages, which could have affected the statistical analysis. The CDF site is closer to the SVRA and, as a result, has larger swings in concentration, increasing the variability of that dataset, which may also explain the lack of a statistical difference.

The mixed message from this analysis shows that the direct emissions impacts of vehicle activity on the SVRA, even if statistically measurable, are small compared to the indirect impacts caused by OHV activity increasing the ability of winds to entrain sand particles from the dunes and carry them to the Mesa.

Table 3.2– Average PM10 Concentration for the Highest and Lowest SVRA Activity

| | Highest 50 days for vehicles | Lowest 50 days for vehicles | Highest days - Lowest days | Statistical Confidence of Data (1-P) |
|--------------------------------|------------------------------|-----------------------------|----------------------------|--------------------------------------|
| Average SVRA Vehicles | 3738 | 380 | 3357 | |
| Average Mesa2 PM ₁₀ | 32.1 | 24.2 | 7.9 | 96.4% |
| Average CDF PM ₁₀ | 37.1 | 31.7 | 5.4 | 87.8% |
| Average Oso PM ₁₀ | 27.7 | 28.8 | -1.1 | 69.4% |

4 SAND FLUX MEASUREMENTS AND DATA ANALYSIS

The Great Basin Unified Air Pollution Control District (GBUAPCD) was an integral part of the study design team and provided the equipment, training, oversight, and data analysis for the sand flux portion of the Phase 2 Study. Because wind erosion is the source mechanism for creating wind blown crustal PM₁₀ emissions, understanding and quantifying wind erosion in the potential source areas is essential in understanding the source emission mechanism.

The GBUAPCD is one of the most experienced and respected organizations in the country regarding analysis and mitigation of wind blown, crustal PM. With studies beginning in the 1980's, the GBUAPCD has developed innovative techniques for measuring sand movement and calculating wind erosion and PM₁₀ emission rates for the dry Owens Lakebed and nearby Keeler Dunes, the largest source of PM₁₀ emissions in the nation. This chapter describes the measurements performed and presents the data collected for this part of the study.

Monitoring Site Descriptions and Measurements Performed

The study design called for sand flux measurements in the SVRA, as well as a control area south of the SVRA where no OHV activity is allowed, and an agricultural site northwest of the CDF, Mesa2 and Oso stations. This allowed for comparison of wind erosion rates between the SVRA, the control area and the vegetated rangeland to the northwest (upwind) of the CDF, Mesa2, and Oso sites. Table 4.1 below describes the three types of sand flux sensors deployed for this portion of the study:

Table 4.1 – Description of Sand Flux Sensors

| Sensit | BSNE Sandcatcher | Cox Sandcatcher |
|--|---|---|
| A solid state sensor that measures the count and kinetic energy of sand/soil particles that impact the sensing element. (See Figure 2.7) | A device that traps sand/soil particles at a number of different heights above the soil surface. (See Figure 2.6) | A device that traps sand/soil particles at a single height above the soil surface. (See Figure 2.5) |

Figure 4.1 and Table 4.2 below depict the location and description of measurements made at each sand flux sampling location. Site locations C1, C2 and C13 were all equipped with a Model H11 Sensit. Each Sensit was suspended so the sensing element was 15 cm above the surface of the sand. Each Sensit was also connected to a Cambell Scientific CR-100 data logger to provide a continuous record of the sensit readings. A solar panel with battery back-up was used to power the sensit and data logger. Sites C1 and C2 were also equipped with a BSNE (Box Springs Number Eight) sand catcher to provide a vertical profile of sand movement. The BSNE sandcatchers were configured to collect sand at 10 cm, 15 cm, 25 cm, 63 cm, and 100 cm above the sand surface. All sites also included a Cox Sandcatcher (CSC) set at a sensor height of 15 cm above the sand/soil surface.

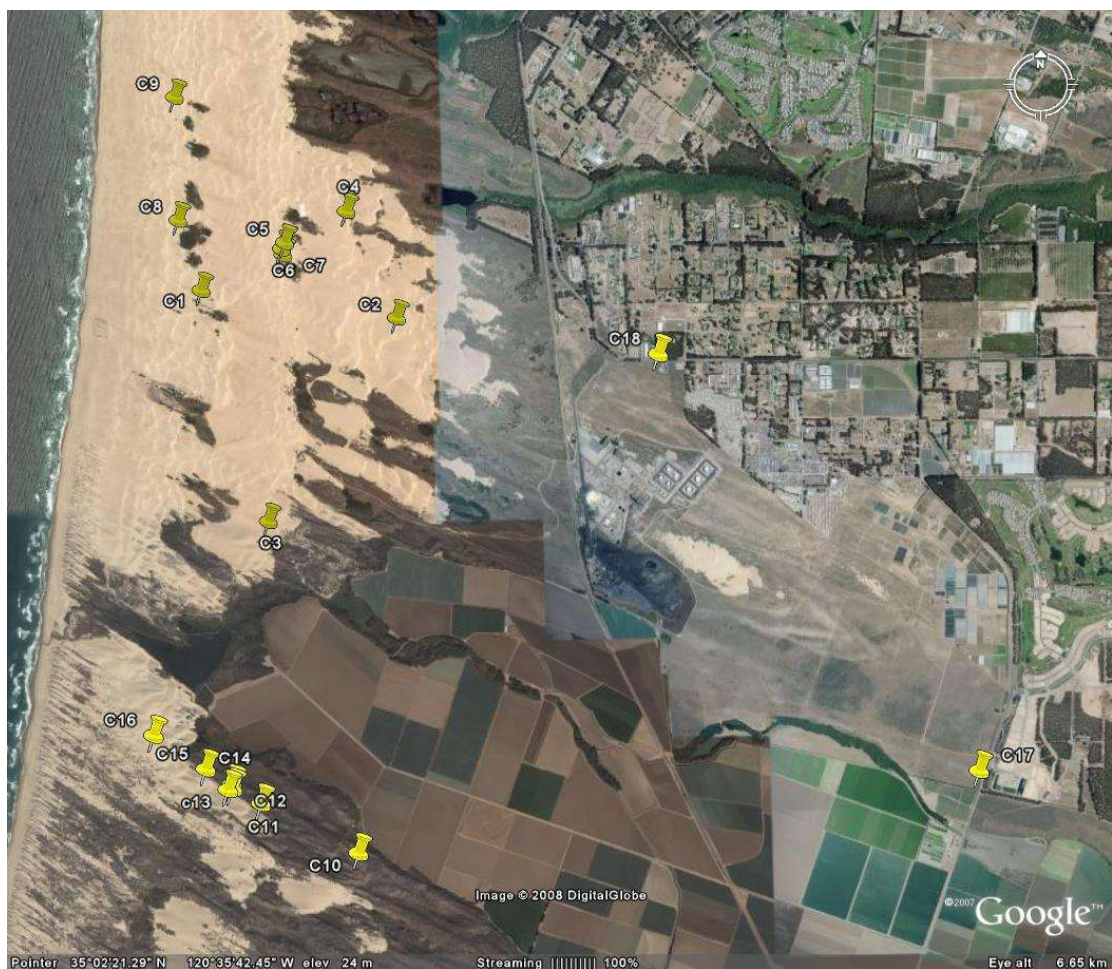


Figure 4.1– Location of Sand Flux Measurement Locations

Table 4.2 – Sand Flux Measurement Sites and Equipment

| Site ID | General Location | Equipment |
|---------|---------------------|------------------|
| C1 | SVRA | Sensit,BSNE, CSC |
| C2 | SVRA | Sensit,BSNE, CSC |
| C3 | SVRA | CSC |
| C4 | SVRA | CSC |
| C5 | SVRA | CSC |
| C6 | SVRA | CSC |
| C7 | SVRA | CSC |
| C8 | SVRA | CSC |
| C9 | SVRA | CSC |
| C10 | Upwind of Oso Flaco | CSC |
| C11 | Oso Flaco | CSC |
| C12 | Oso Flaco | CSC |
| C13 | Oso Flaco | Sensit, CSC |
| C14 | Oso Flaco | CSC |
| C15 | Oso Flaco | CSC |
| C16 | Oso Flaco | CSC |
| C17 | Upwind of Mesa2 | CSC |
| C18 | Upwind of CDF | CSC |

The sensits and CSCs started collecting valid data on 4/22/08 and continued through 5/23/08. The BSNE sandcatchers started collecting valid data on 5/6/09 and continued through 5/23/09. After installation of the field equipment, all sand flux measurement locations were visited and serviced every 24 hours. The daily service of the sandcatchers (Cox and BSNE) included the following:

- Measure and record the “as found” sandcatcher height above surface
- Empty sandcatcher contents to labeled baggie
- If necessary, reset the sandcatcher height to the standard height (CSC set to 15 cm)

The sensits were checked daily and the as found sensor height was recorded and reset to 15 cm if needed. Data from the sensit dataloggers was downloaded approximately once per week to storage modules. The BSNE sandcatchers were also serviced daily and the as found sensor height was recorded and reset as needed.

Sand samples from the sandcatchers were transported to the SLO APCD laboratory and weighed to the nearest tenth of a gram by CARB staff. All sand weights and sensit data records were transferred to GBUAPCD staff for analysis. The results of GBUAPCD’s data analysis, including a complete description of algorithms used for this analysis, are presented in full in Appendix B.

The major findings of the sand flux study are as follows:

- **During the sand flux study period, high sand flux was associated with high downwind PM₁₀ values.** Figure 4.2 below is an example of this relationship.

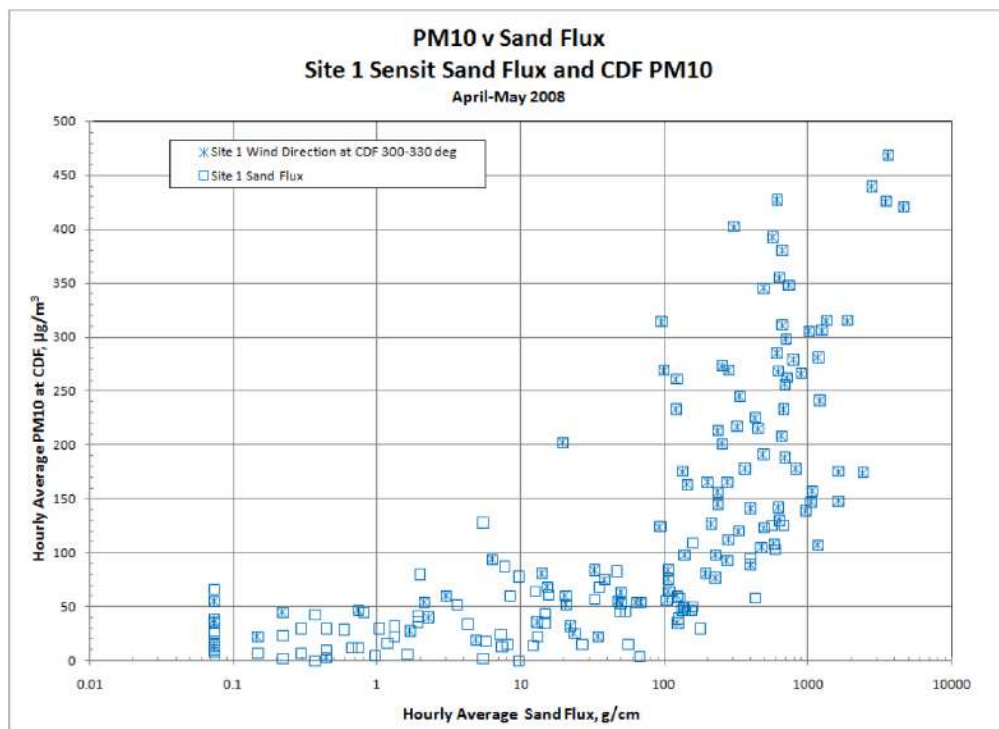


Figure 4.2 – PM10 at CDF Compared to Sand Flux at C1

- **The threshold wind speed where significant sand movement begins was significantly higher at the undisturbed Oso sand sheet as compared to all portions of the SVRA.**

Table 4.3 below presents the threshold wind speed comparison between the two SVRA areas and the natural Oso area.

Table 4.3 - Comparison of Threshold Wind Speed for Different Areas Tested

| Location (Site ID) | Threshold Wind Speed at 10 Meters |
|---|--------------------------------------|
| SVRA – Beach Dunes (C1, C8, C9) | 7.7 mph |
| SVRA – Interior Dunes (C2,C3,C4, C5, C6, C7) | 10.6 mph |
| Natural Area – Oso (C11, C12,C13, C14, C15, C16) | 13.3 mph |

- **Using the sand flux data and the Gillette model, both areas in the SVRA were more erodible by wind than the Oso control area.** Not only does the wind need to blow harder to start significant sand movement in the natural area, but the Gillette model shows the Oso natural area to be much less erodible than the SVRA at the same wind speed. Figure 4.3 below presents this relationship.

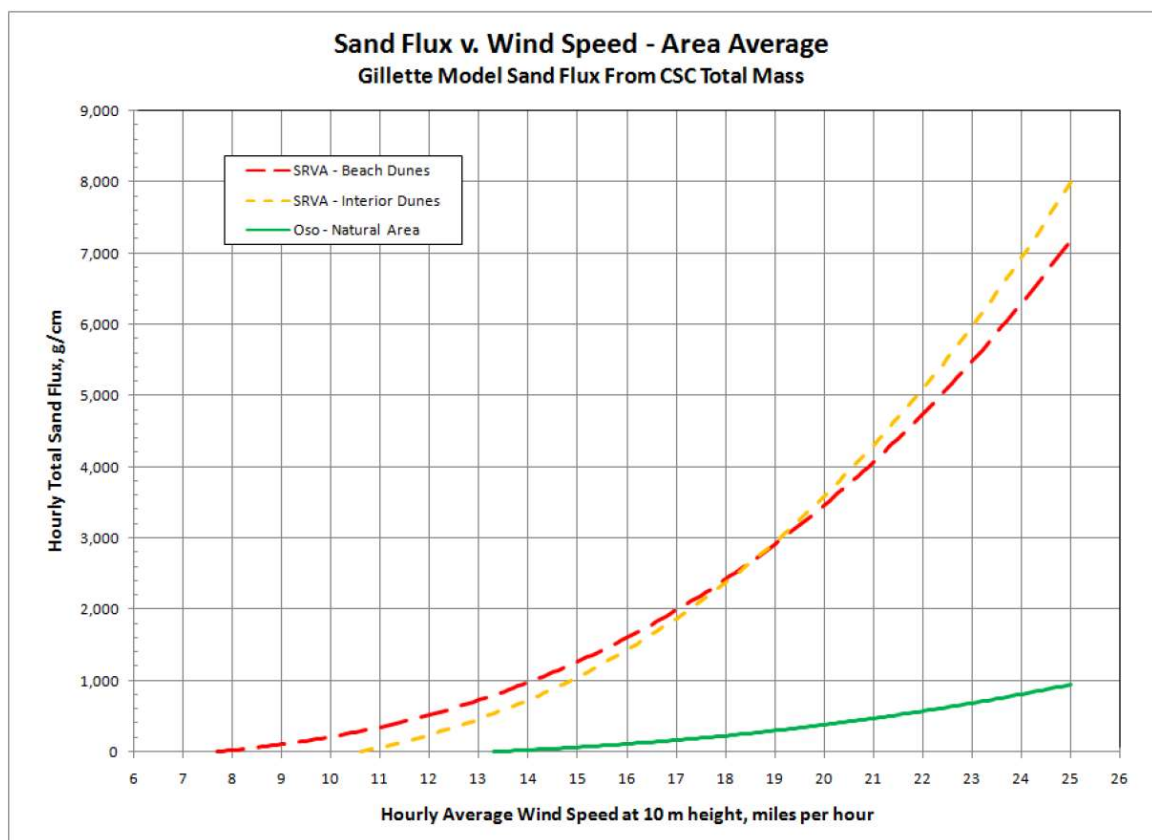


Figure 4.3 – Sand Flux for SVRA and Oso

- **The CSCs located in vegetated areas upwind from the Oso, Mesa2, and CDF sites (C10,C17, C18) did not collect any sand or soil for the entire sampling period.** This indicates these vegetated areas are not a source of wind blown dust.

These findings further confirm the open sand sheets to the northwest of the Oso, CDF, and Mesa2 monitoring stations as the source of high levels of wind blown crustal particulate measured during the study period. They also add important information to help determine the role of OHV activity in the wind blown PM events observed on the Nipomo Mesa, particularly the findings that open sand areas within the SVRA are more erodible by wind than similar areas in the Oso natural area, and the threshold wind speed for sand movement is greater in the natural area than in the SVRA.

5 AEROSOL AND SOIL PARTICLE COMPOSITION AND SIZE MEASUREMENTS AND DATA ANALYSIS

The UC Davis DELTA Group developed, installed and operated the instruments used to measure particle mass, size and composition; these measurements were conducted during short-term, high wind events and well as over longer periods through the summer, fall, and winter of 2008.

Personnel from the University of Texas, El Paso, collected and analyzed soil samples from the various study sites. This chapter describes the measurements performed and presents the data collected for this portion of the study.

5.1. Monitoring Site Locations and Measurements Performed

Probably the most important diagnostic tool for this portion of the Phase 2 study was the ability to deploy DRUM aerosol samplers, on a north to south transect allowing source identification of aerosol episodes and comparisons between measurements downwind from the SVRA and downwind from dune areas without OHV activity. Continuous, highly time-resolved aerosol sampling allowed episodes to be tracked with an approximate 3-hour time resolution that facilitates close correlation with on site meteorology.

Table 5.1 below identifies the samplers used and associated sampling periods; Figure 5.1 shows the sampling site locations.

Table 5.1 Delta Group Aerosol Sampling

| Site Name | Delta Group Measurements | Delta Group Sampling Period |
|------------------|---|-----------------------------|
| Ten Commandments | 8 DRUM | Intensive |
| Guadalupe Dunes | 8 DRUM | Sept 08 – Nov 08 |
| Oso Flaco | 8 DRUM | Intensive |
| Mesa2 | 8 DRUM (also side by side all DRUMs 1 week) | Jan 08-Feb09 |
| CDF | 8 DRUM | Intensive + 6 weeks |
| Conoco Upwind | 8 DRUM | Intensive |
| Bluff | 8 DRUM and 3 DRUM | Intensive |
| Silver Spur | 3 DRUM | Intensive |
| Pier Ave. | 3 DRUM | Intensive |
| Grover Beach | 3 DRUM | Intensive |



Figure 5.1 - Aerosol Sampling Sites with Prevailing Wind Direction in Aerosol Episodes

5.2. Analysis of Sands

5.2.1. Collection of Sand Samples

The DELTA Group and University of Texas, El Paso (UTEP) collected over 150 sand samples over every transect from each ambient air sampler to the ocean, with photographs taken at every soil sampling site. The samples were placed into coded Ziplock™ bags and transported to UC Davis for analysis.

5.2.2. Sieving and Triages of Sand Samples

The samples were sieved in standard dry geological sieves, and then divided into bags; roughly 60 of these sample bags were sent to UTEP for Malvern particle sizing. From the results of the sieving a selection of the samples with relatively high mass in the $< 50 \mu\text{m}$ bin were re-suspended using an air jet at UC Davis, and collected onto the stages of an 8 DRUM impactor, the same instruments used to collect aerosols in the ambient component of the study.

5.2.3. Observations from Sand Collection Field Effort

An important observation from the sand collection field effort was the presence or absence of ephemeral soil crusts, a key factor known to influence airborne particulate levels measured in other high wind, sandy areas such as Owens and Mono Lakes. Direct observations of the sand at Oso Flaco showed the presence of such a crust about 1/2 to 1 cm thick; it was capable of supporting itself over a few cm but was easily broken under any pressure, such as boots. The soil crust was observed throughout the open sand sheets upwind from the Oso site, but was not present in the SVRA.



Figure 5.2 - Sand crust at the eastern edge of the sand sheet upwind of Oso Flaco control site. The thickness of the layer was roughly 1 cm

Such crusts greatly suppress particle emission by gluing small particles into larger ones and suppressing the saltation processes that can occur when the crust breaks up. This is seen at Owens (dry) Lake, where almost no dust is emitted into the air, even in strong winds, until the robust salt crust formed every year by winter rains breaks up. (Reid et al, 1994)

5.2.4. Analysis of Sand/Soil Samples

Various methods were used to analyze the 150 samples of sand collected in sampler to beach transects upwind of all aerosol sampling sites. As shown in Figures 5.3 and 5.4 below, both sieving and the more complex Malvern soil analysis by UTEP showed very little mass in most samples for particles below about 50 μm , as expected.

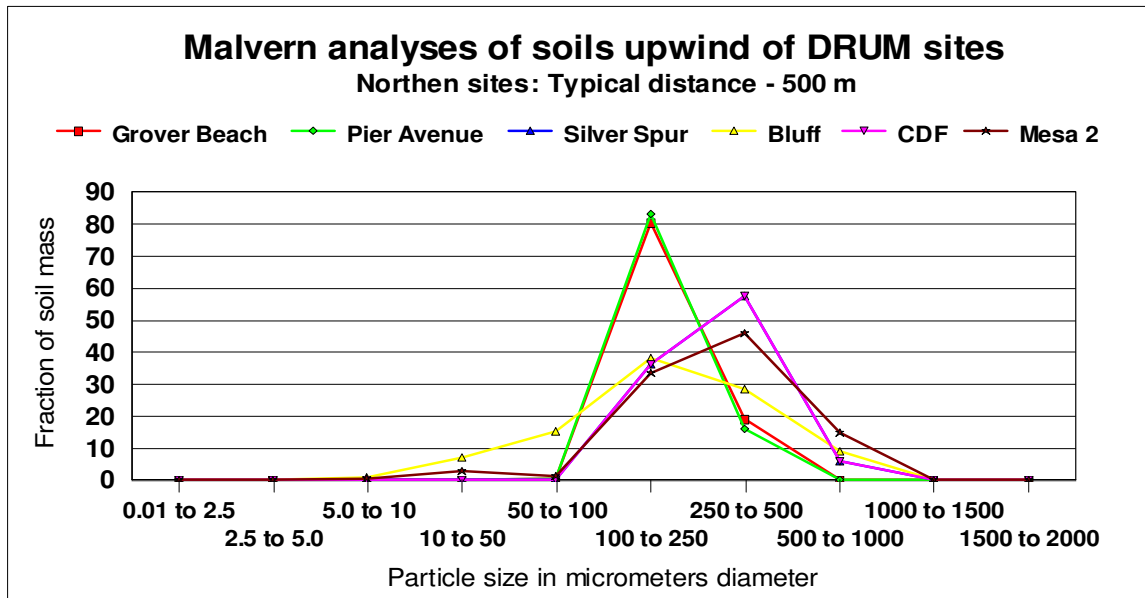


Figure 5.3- Malvern analyses of soils upwind of the northern sites

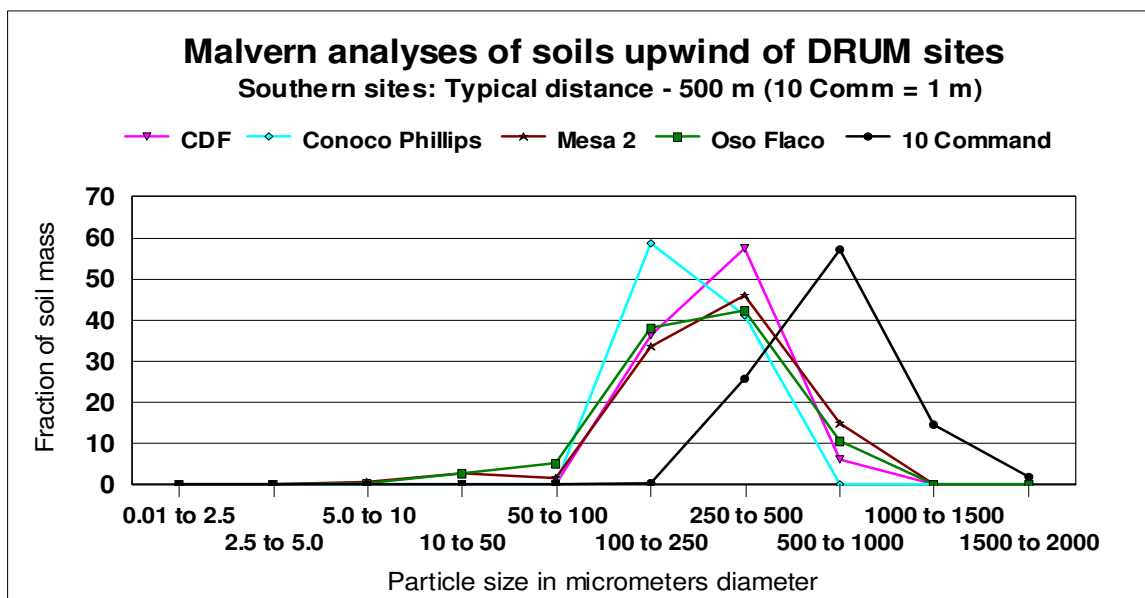


Figure 5.4 - Malvern analyses of soils from sites upwind of the southern DRM sampling sites

While the Malvern analysis shows very little particle mass below 10 microns, analysis of re-suspended samples, shown in Figure 5.5 below, demonstrates there is indeed a fraction of the sand with particle diameters less than 10 micron. The Malvern and re-suspended sample analysis show a similar particle size distribution between the various transects analyzed. Elemental analysis of the re-suspended samples showed a very similar composition between soil samples.

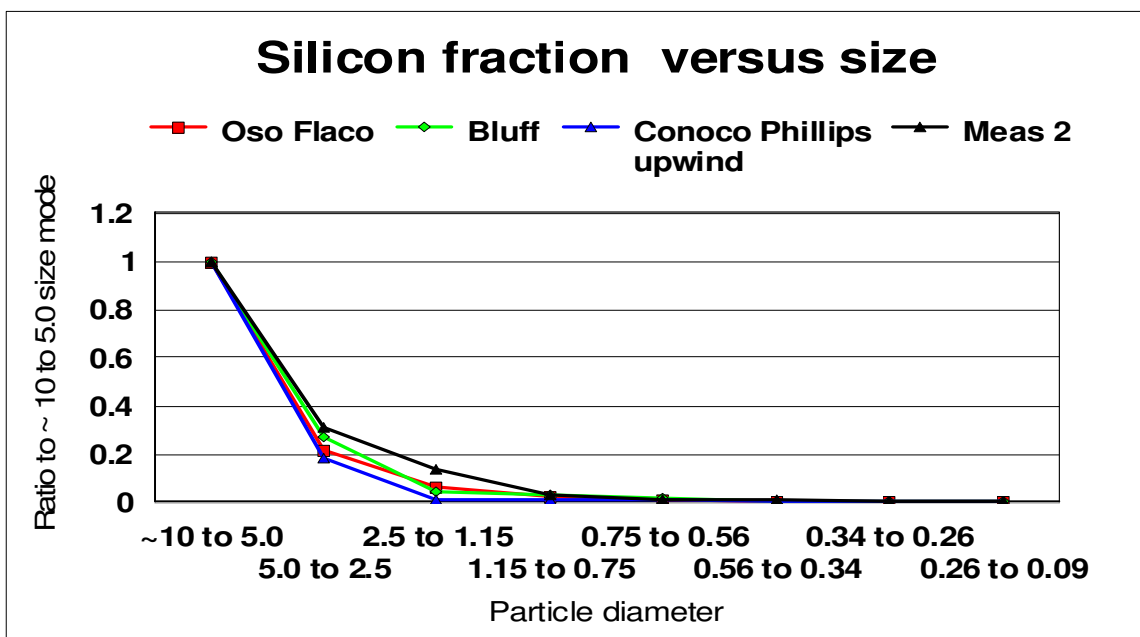


Figure 5.5 - Re-suspension of sieved samples resulting in size profiles of sand transect data relative to the 10 to 5.0 µm mode

A special effort to analyze the soil samples in the transect between the Bluff and Silver Spur site was made to better understand the potential for particulate emissions from this intensely cultivated agricultural land. The rich alluvial plane north of the SVRA, although under intense cultivation, will clearly have soils derived from upstream sources and thus, very different from the sandy soils common to the coastal area. Since such soils typically include silt and clay components with sizes well below 10 µm in diameter, and thus potentially able to impact windblown dusts, special efforts were made to analyze the soils both in a dry, “as-is” condition, as well as dispersed in water to break weakly adhering bonds.

Figures 5.6, 5.7 and 5.8 below show the Malvern analysis of the soils 600 meters upwind of the Silver Spur site, both at the edges of the sand dune field and in the rough middle of the farm fields; the figures show data from both the dry and wet analysis methods. As shown in Figure 5.6, there are few particles in sizes below 50 µm diameter, a common finding for almost all other samples from the non-disturbed dune sites.

In contrast, Figure 5.7 below shows farmland soils dried to essentially zero water content contain a small fraction of soil particles below 10 µm, with some extending to almost the PM_{2.5} cut. These soils were taken at a road edge near the fields in the rough center of the farmed area.

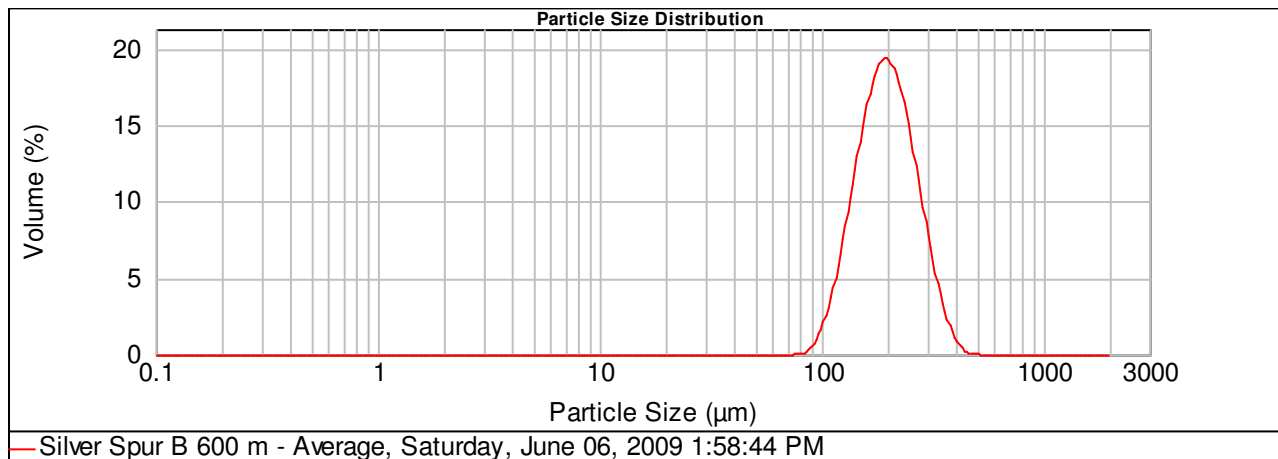


Figure 5.6 - Malvern analysis of soils 600 m upwind of the “Silver Spur” site

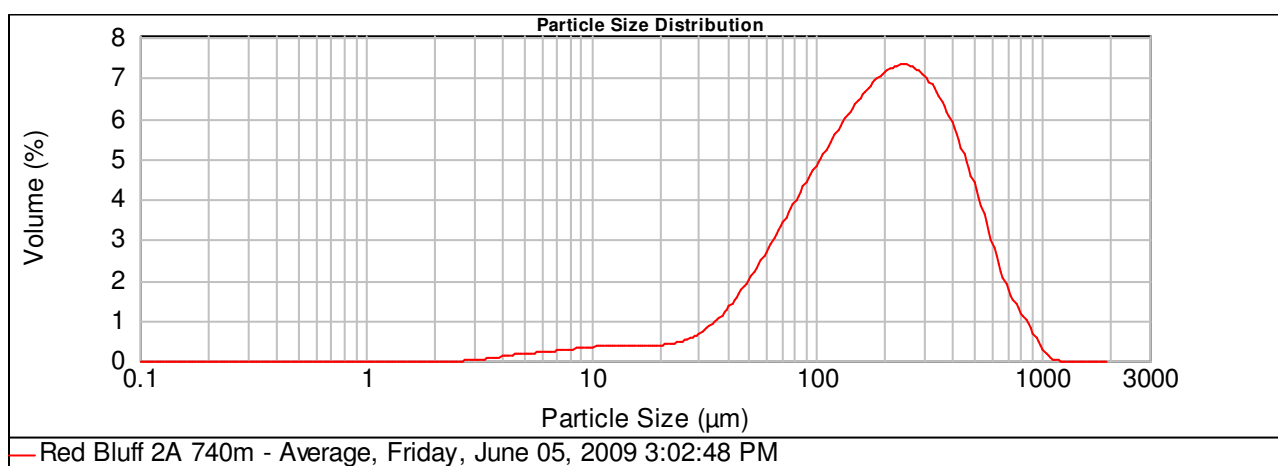


Figure 5.7 - Analysis of dried farmland soils 740 m upwind of the Bluff site

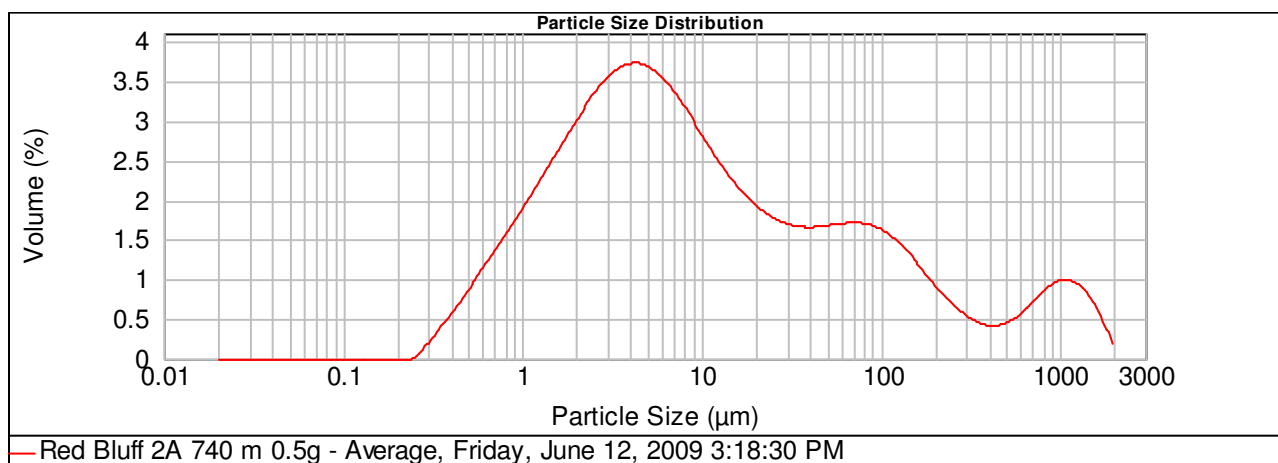


Figure 5.8 - Analysis of farmland soils 740 m upwind of the Bluff site dispersed into a water solution and then sized

The analysis of the same soil in a water solution, presented in Figure 5.8 above, shows that most particles disassociate into smaller particle sizes, with a mode around 4 μm . The condition of the actual soils was like neither of these extremes. Since the land is under intense cultivation, the actual soils are routinely irrigated and much of the area between Bluff and Silver Spur has crop

cover, typically lettuce and broccoli. This can also be seen by the tendency of the soil as collected to form clumps or clods. As a result, any free particles in the fine alluvial soils do not normally occur in a re-suspendable form, and thus would be less likely to cause aerosols. This helps explain the almost total lack of aerosol episodes at the Bluff site, which is directly downwind of the farmed area. The combination of crop cover and routinely wetted soils and the crop cover provides very little potential for dust unless special conditions are met such as disking of a thoroughly dry field or vehicular traffic on dry, dirt farm roads.

5.3. Analysis of Ambient Air Aerosols

The Delta Group DRUM sampler used for ambient aerosol sampling is a powerful research tool that can measure particulate mass and elemental composition by particle size fraction. The DRUM sampler is capable of continuous measurements with a time resolution as short as 1.5 hours for the smallest particle fractions, and up to 6 hours for the coarsest particle fraction.

5.3.1. DRUM Sampler Side by Side Quality Control Check

Prior to deployment of the numerous DRUM samplers used in the spring intensive monitoring period, all DRUM samplers were co-located at the Mesa2 monitoring site for side by side quality assurance comparisons. Both 8-Stage DRUM samplers (measuring eight different particle size fractions) and 3-Stage DRUM samplers (measuring 3 different particle size fractions) were run and compared. The Stage 1 drums (10.0 – 5.0 μm particles) showed poor time resolution during peak episode due to the width of the DRUM slots, so they are not included in the comparisons. Figure 5.9 below presents a comparison of all the Stage 2 drum data (5.0 to 2.5 μm particles).

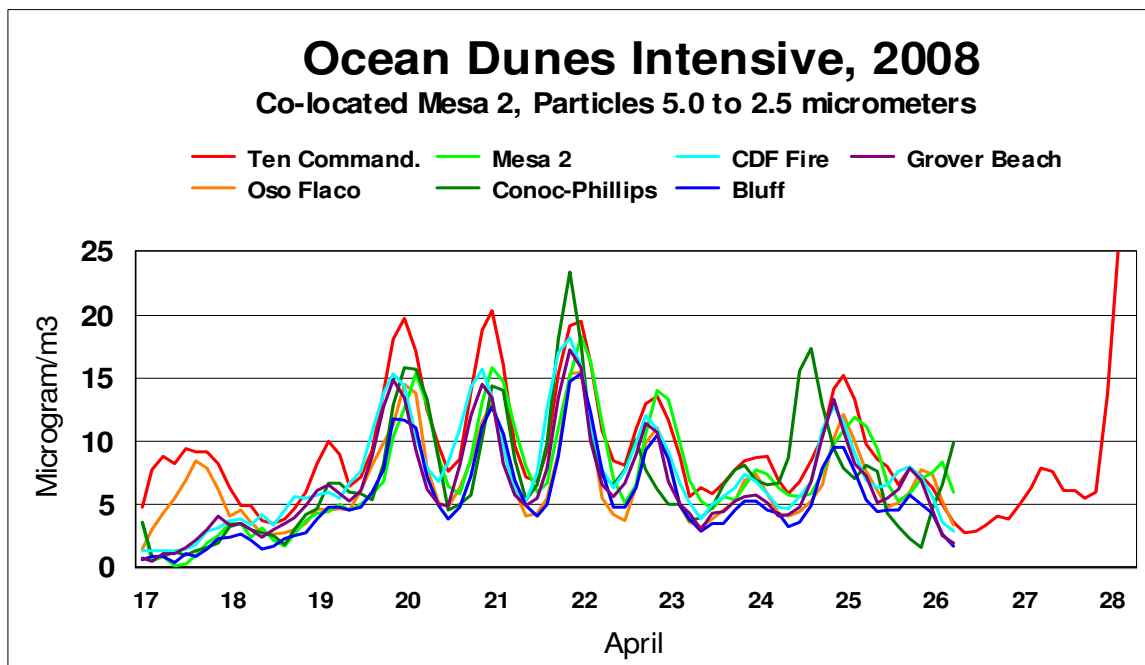


Figure 5.9 – Side by Side Comparison of DRUM samplers at Mesa2

These side by side tests showed accuracy within the standard EPA $\pm 15\%$ quality assurance (QA) criterion for all samplers except the “Ten Commandments” site DRUM. That sampler did not meet the required QA criteria, so its data was not included in the study analysis.

Quantitative comparisons between the 3 DRUM and 8 DRUM samplers were also performed. For the Bluff site, both samplers ran concurrently and recorded 6 values with a mean aerosol mass of $5.8 \pm 0.7 \mu\text{g}/\text{m}^3$. For Mesa 2, comparing the 3 DRUM and 8 DRUM sampler measurements for the April 26 episode showed a mean mass value of $30.5 \pm 0.5 \mu\text{g}/\text{m}^3$. Overall, the 3 DRUM and 8 DRUM sampler measurements for the 3 peak episodes were quite similar, with a standard deviation of $3.7 \mu\text{g}/\text{m}^3$ across all sites.

While the comparisons between DRUM samplers were quite good (except the Ten Commandments sampler), comparison of that data to the APCD-operated TEOM sampler data during the side by side tests at Mesa2 was not as favorable. One factor that makes DRUM/TEOM comparisons difficult is that the DRUM sampler has a time resolution of about 1.5 hours for the finest stages, and up to 6 hours for the coarse stage, while the TEOM records hourly averages. In addition, the TEOM sampler is designated as a federally equivalent measurement method for use in determining compliance with ambient air quality standards; its data compared favorably to the federal reference method, hi-volume sampler data at Mesa 2. In contrast, the DRUM samplers are a research tool and were not designed to be a federally equivalent measurement method.

The comparisons at Mesa2 between the DRUM and TEOM showed generally good agreement for 24-hour averages on days with no wind/PM episode. On episode days, however, the TEOM data always showed higher 24-hour average concentrations than the DRUM samplers. Close examination of the data showed the coarsest fraction of the DRUM data appearing suppressed during wind/PM episodes, indicating the possibility of loss of mass on the coarsest drum stages. It is possible that the DRUM samplers were overwhelmed during the episode periods by the extreme wind and particle concentrations that are unique to this field study.

All particulate monitoring methods, including the federally approved methods, have various weaknesses. It is very common for a sampling method to work well in one application, but poorly in another application; thus, the poor comparability between the TEOM and DRUM samplers is not surprising. What is most important is that data comparability between each DRUM sampler is very good, which allows for accurate comparisons of DRUM sampler data from the different sampling locations. DRUM data should not be compared to TEOM data or health standards.

5.3.2. Analysis of Mesa 2 Winter 2008 DRUM Data

Continuous monitoring of aerosols at Mesa 2 in 8 particle size modes using a UC Davis DELTA Group 8 DRUM sampler was initiated on January 14, 2008, and continued to February, 2009. These data were designed to meet several of the Phase 2 study goals:

1. Supplement the co-located PM_{10} mass data with information on particle size so as to better identify sources and evaluate potential health impacts; and,
2. Provide samples suitable for compositional analyses in order to
 - a. Connect coarse aerosols to potential dust sources; and,
 - b. Evaluate the role of sea salt in Mesa 2 PM_{10} mass measurements

Figure 5.10 below shows a series of time plots from January 14 through February 25, 2008. The plots are segregated by particle diameter, with the two coarsest modes (10 to 5.0 and 5.0 to 2.5

microns) equivalent to the EPA-defined PM₁₀ coarse particle fraction. Everything below 2.5 microns falls into the category of the EPA-defined PM_{2.5} fine particle fraction. As previously discussed, the coarse particle mass appears to be significantly less than the fine fraction on episode days, an anomaly that suggests the coarse stages of the drum samplers may have been overwhelmed by the volume of suspended particles on those days.

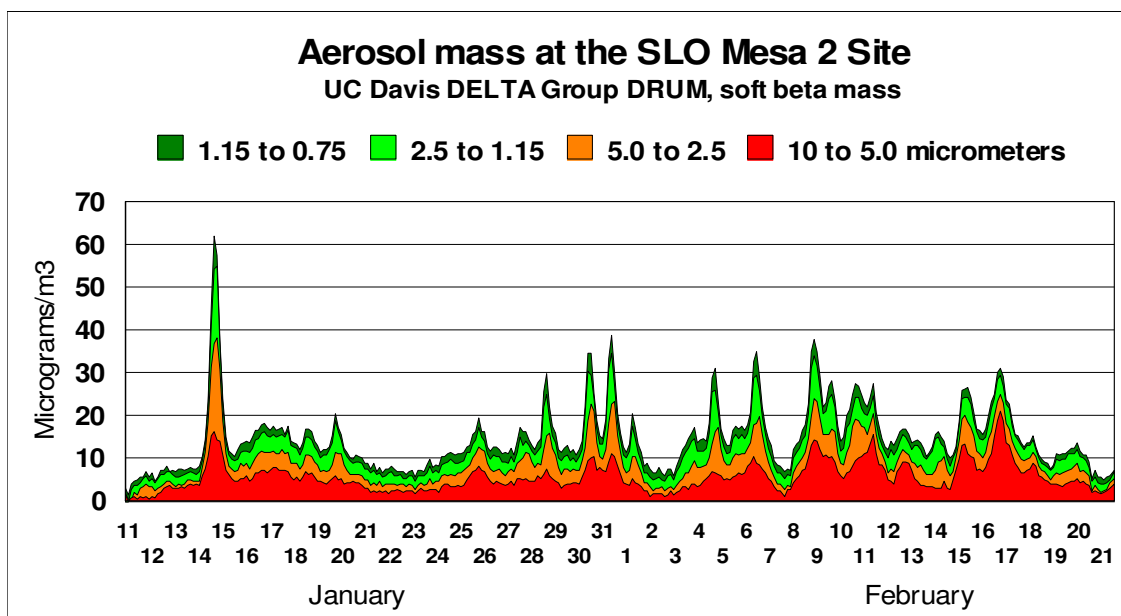


Figure 5.10 - Super-micron masses in the January – February DRUM sampling

In addition to size fractionation, X-Ray Fluorescence (XRF) analysis was also performed on drum particle samples from each sampling site to determine the composition and potential source of the collected particulate; each sample was analyzed for a broad range of potential constituents. Silicon in particular is a distinctive component of sand, and thus an important indicator compound for this study. Similarly, chlorine is a distinctive component of sea salt and generally indicates proximity to the ocean.

Figure 5.11 below presents the silicon concentration for the two coarsest fractions for the same time period.

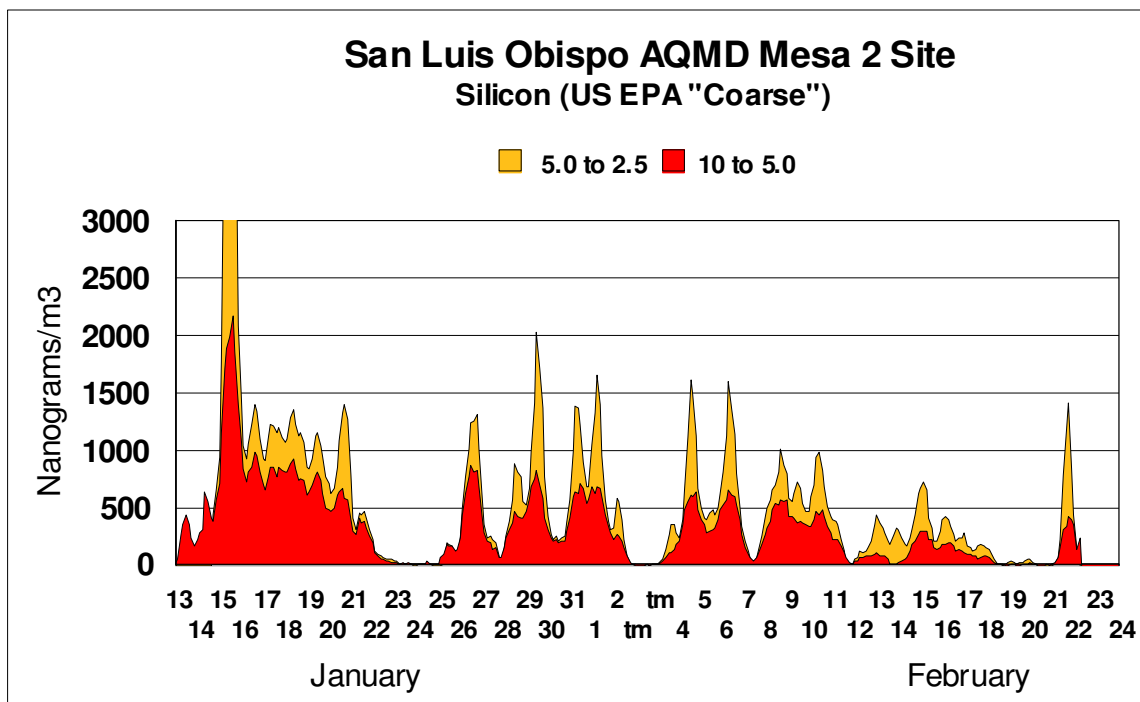


Figure 5.11 - Silicon, the major component of soil, in the coarse modes during the winter, 2008 deployment

Figure 5.12, below presents the chloride concentration for the two coarsest fractions for the winter period.

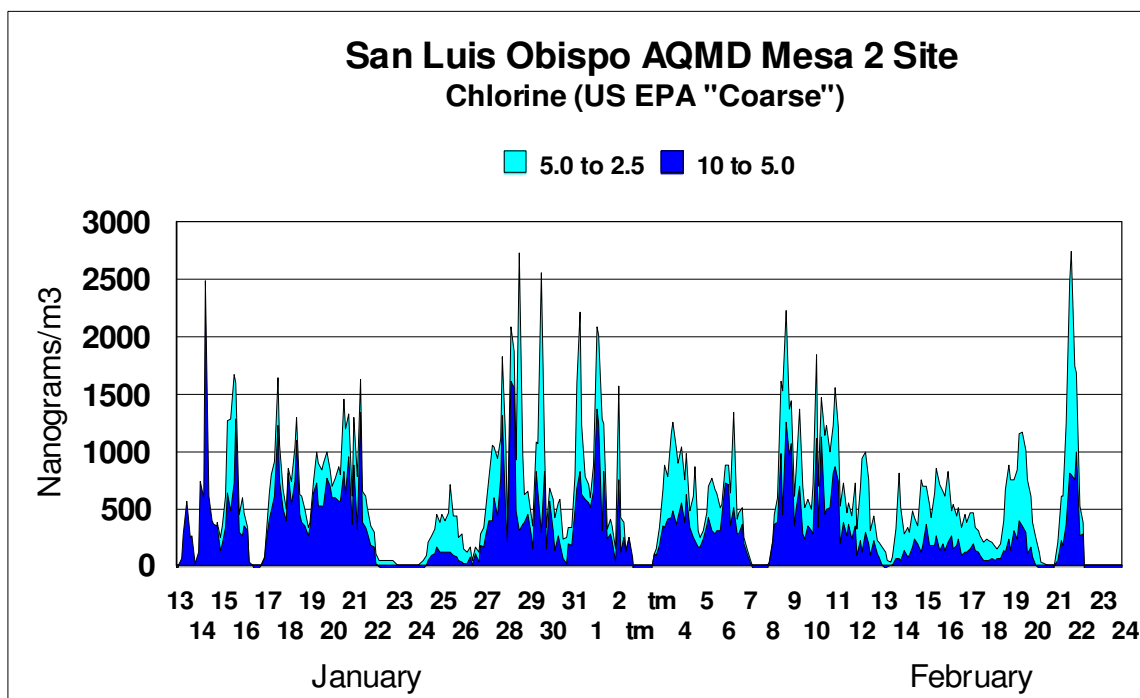


Figure 5.12 - Chlorine from sea salt during the winter, 2008 deployment

The measurement period of January through February, 2008 had several rain events. The wetting of soils strongly suppresses dust formation, thus increasing the sea salt to soil dust ratio above that found in dry conditions (circa 10%). This effect would not occur during most of the year

when rainfall is absent. During the January – February deployment, the average sand/soil component was roughly $\frac{3}{4}$ of all PM₁₀ mass, with the remainder almost entirely sea salt. However, during peak episodes, such as January 15, sea salt comprised only 10% of the mass. The higher salt values later in the month may be tied to repeated rain events that would suppress re-suspension of soil.

Particle size by element is presented in Figures 5.13 and 5.14 below.

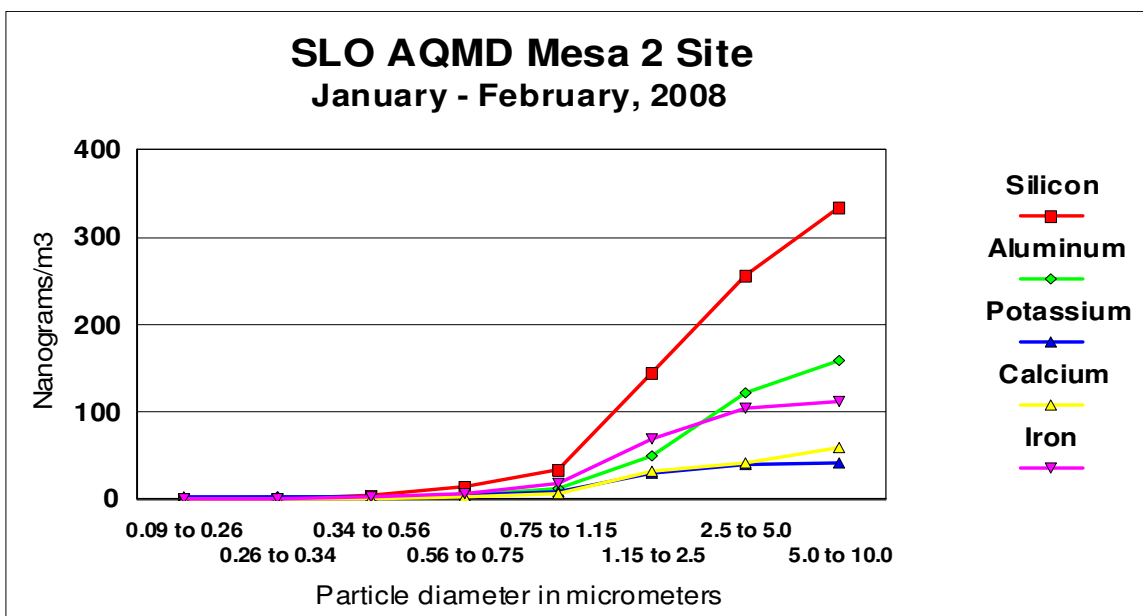


Figure 5.13 - Size distribution of the major soil components

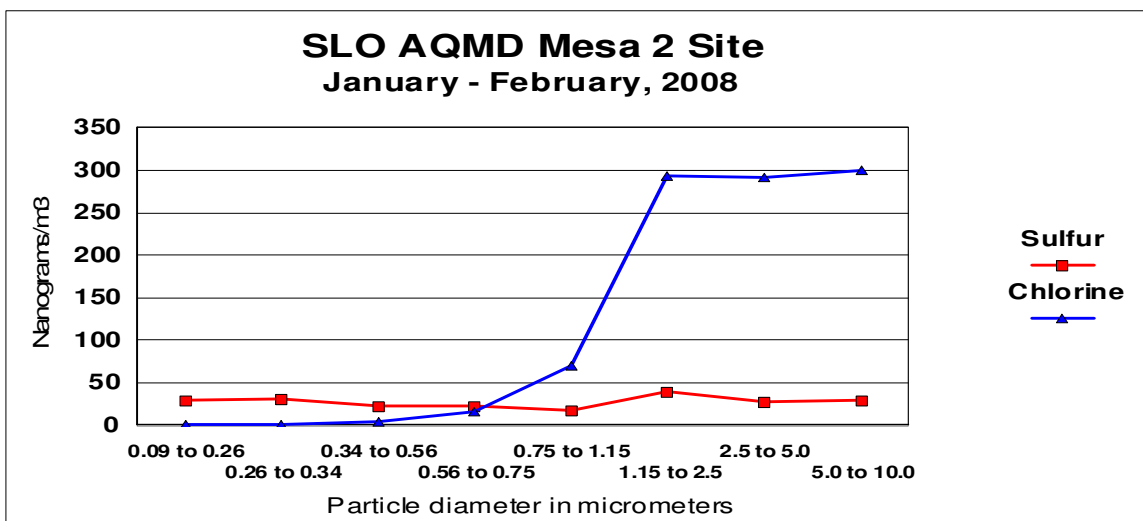


Figure 5.14 - Size distribution of chlorine from sea salt, along with sulfur data. The coarse sulfur is from sea spray, the fine sulfur is likely anthropogenic

Figure 5.15 below presents the ratio of soil elements showing a steady progression to a very pure alumino-silicate sand in the coarsest modes.

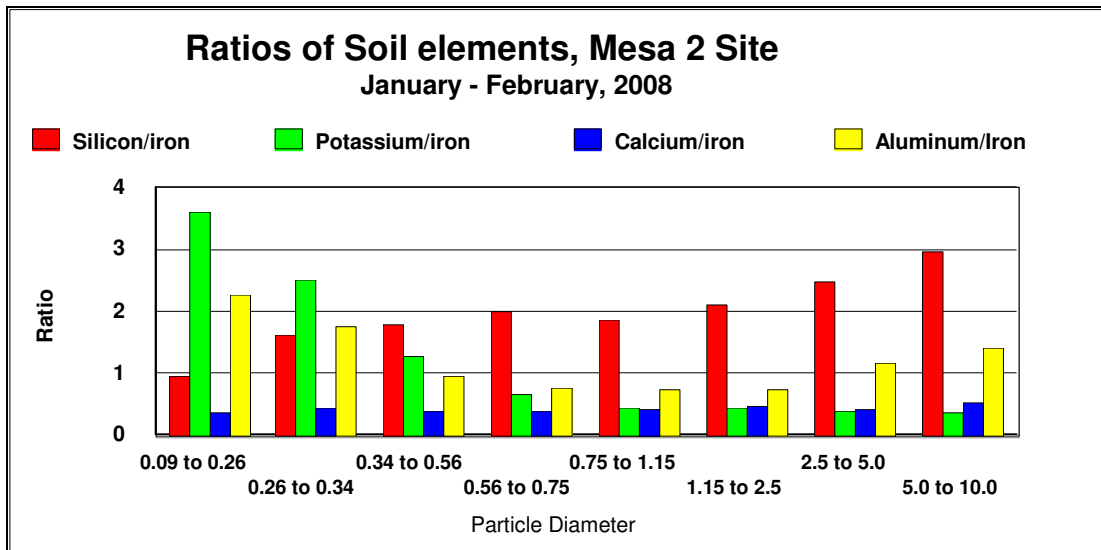


Figure 5.15 - Ratios of soil elements in the January – February period.

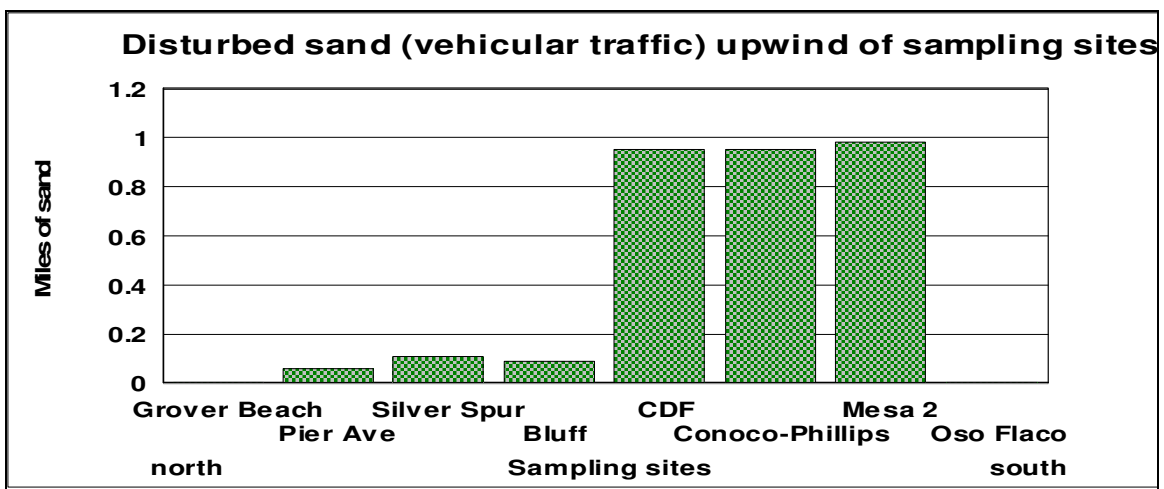
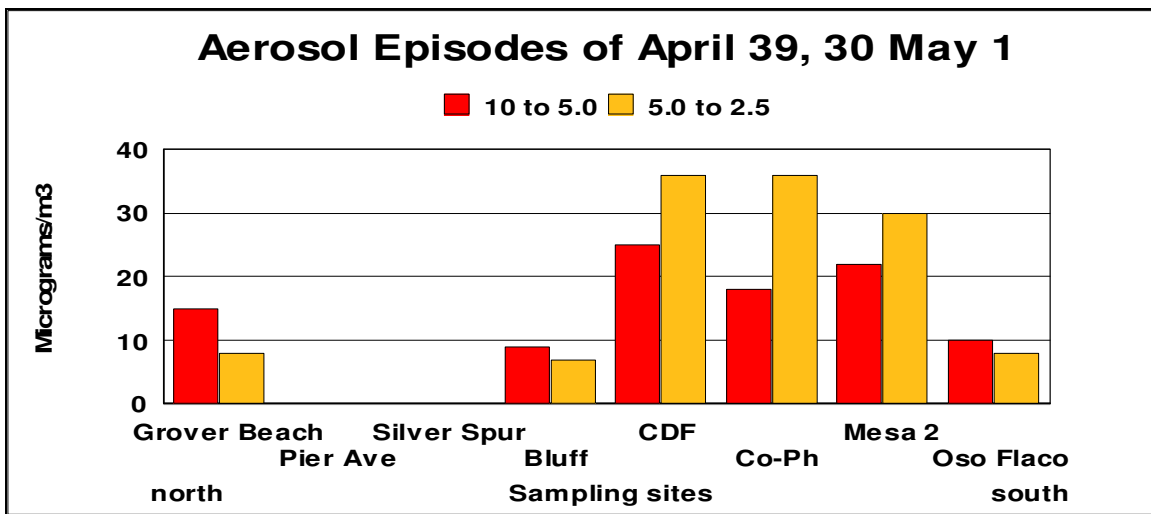
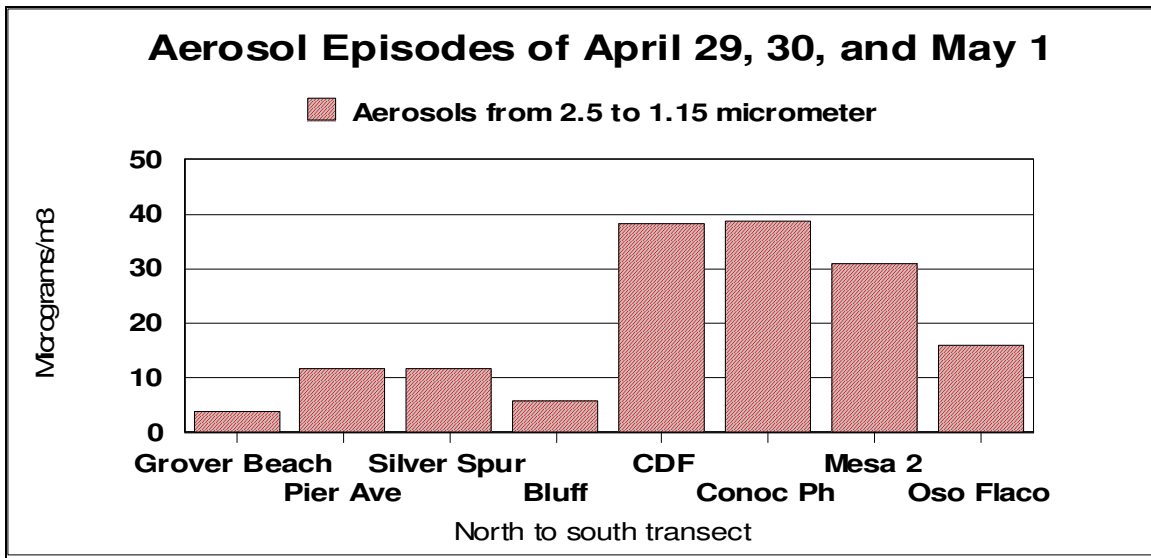
In Summary, DRUM data from the Mesa2 winter 2008 period showed that in the dry period, particulate composition was about 90 % sand/soil and 10% sea salt. In the rainy periods, the soil/sand ratio dropped to about 75% soil/25% salt. Overall, the coarse fraction dominated the mass of samples, with a composition consistent with sand.

5.3.3. Analysis of Spring Intensive DRUM Data

The heart of the Phase 2 study design was to conduct and compare particulate measurements downwind from the SVRA to measurements downwind from a variety of control sites. The intensive monitoring portion of the study was designed to provide numerous DRUM sampler measurements across the study area to capture potential source impacts during a period of likely wind/particulate events. Three of our optimally located sampling sites (ConocoPhillips, Oso Flaco, and 10 Commandments) were without line power, requiring transport of heavy batteries to each site every few days. In addition to this logistical difficulty, the Oso site experienced a number of periods of failure due to battery/inverter problems.

Intensive sampling was performed in April and May, 2008, with an array of both 3 DRUM and 8 DRUM aerosol sampling sites from Grover Beach to Santa Barbara County (see Table 5-1 and Figure 5-1). Note that samples from the 10 Commandments site are absent from these data because the 8 DRUM sampler used at this location failed the $\pm 15\%$ equivalency in the side-by-side tests at Mesa 2. In addition, the Oso sampler failed due to battery/inverter problems after the 4/29 episode, and the Mesa2 sampler failed following the 4/30 episode due to electrical problems. As a result, the Oso data is only represented in the 4/29 episode, and the Mesa2 data presented represents an average of the 4/29 and 4/30 episodes. Data from the APCD TEOM monitors show that 4/29 was the highest concentration episode, followed by 4/30, 5/1 showing the lowest PM levels.

Figures 5.16, 5.17, and 5.18 below present these results. As shown in the first two charts, particulate levels in both the coarse and fine fractions were significantly higher at the sites downwind from the SVRA (CDF, Mesa 2 and ConocoPhillips) than the measurements taken downwind from the control sites where no vehicle activity is allowed. The third chart shows the high correlation between the PM concentrations measured at each site and the amount of open, disturbed sand upwind.



The set of time series plots below present the spring intensive data. Each chart depicts the side by side comparison tests at Mesa2 (shaded) up to April 26, followed by data from the individual sites where each sampler was deployed. Note that, for some of the spring intensive S-XRF data, an analytical error was made in performing the S-XRF scans at the Berkeley laboratory. The huge changes in particle density from episode to non-episode sample periods caused the detector to be overwhelmed at times by the number of x-rays, resulting in periods of data defaulting to zero (over range). This occurred most often in the 10-5 micron particle analysis, and less frequently in the 5-2.5 micron analysis; data presented with this problem is noted.

As shown in Figures 5.19 and 5.20 below, elemental analysis of the Grover Beach samples for the spring intensive confirmed that, as expected, this site is subject to high concentrations of sea salt (likely dissolved in fog) and very little sand/soil particulate.

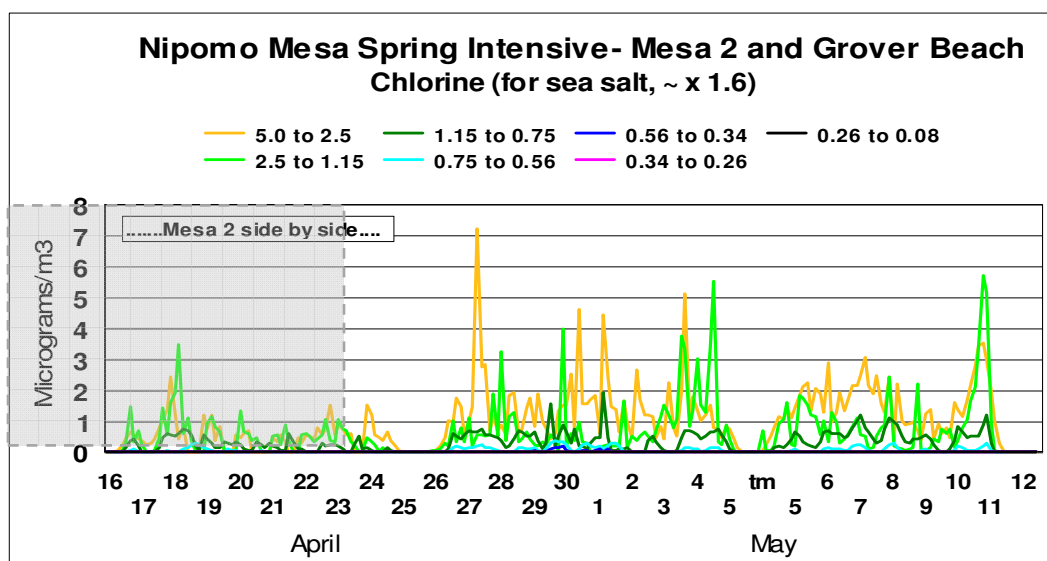


Figure 5.19 - Chlorine a sea salt tracer at Grover beach. Mass between 10 and 5.0 were eliminated due to overflows in the S-XRF detector at Mesa 2

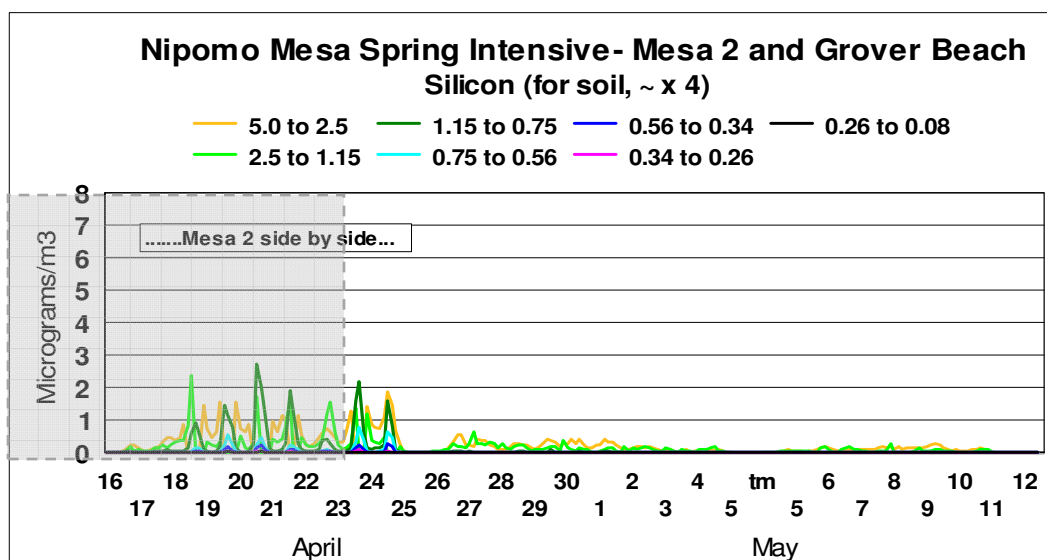


Figure 5.20 - Silicon a soil tracer at Grover Beach on the same scale as the chlorine

Chapter 5 – Aerosol and Soil Particle Composition

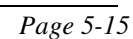


Figure 5.22 – Calcium at the Mesa2 and Bluff Sites

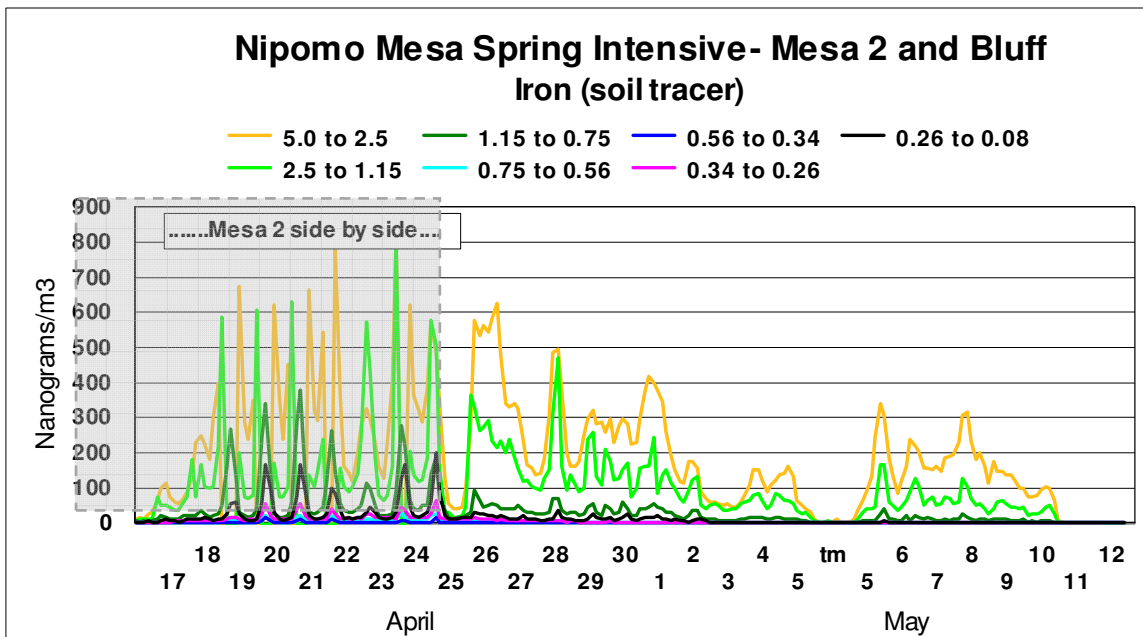


Figure 5.23 – Iron at the Mesa2 and Bluff Sites

The charts above reveal several differences between the Bluff site and the data collected at the Mesa 2 site, including a higher sea salt impact at Bluff and an almost total absence of the relatively fine particles that characterize the Mesa 2 and CDF samples. The Bluff site does show an enhancement of calcium in the aerosol, possibly indicating some local clays, but this is a small component of the total mass. The total mass overall at the Bluff site was significantly less for the intensive period than the sites downwind from the SVRA.

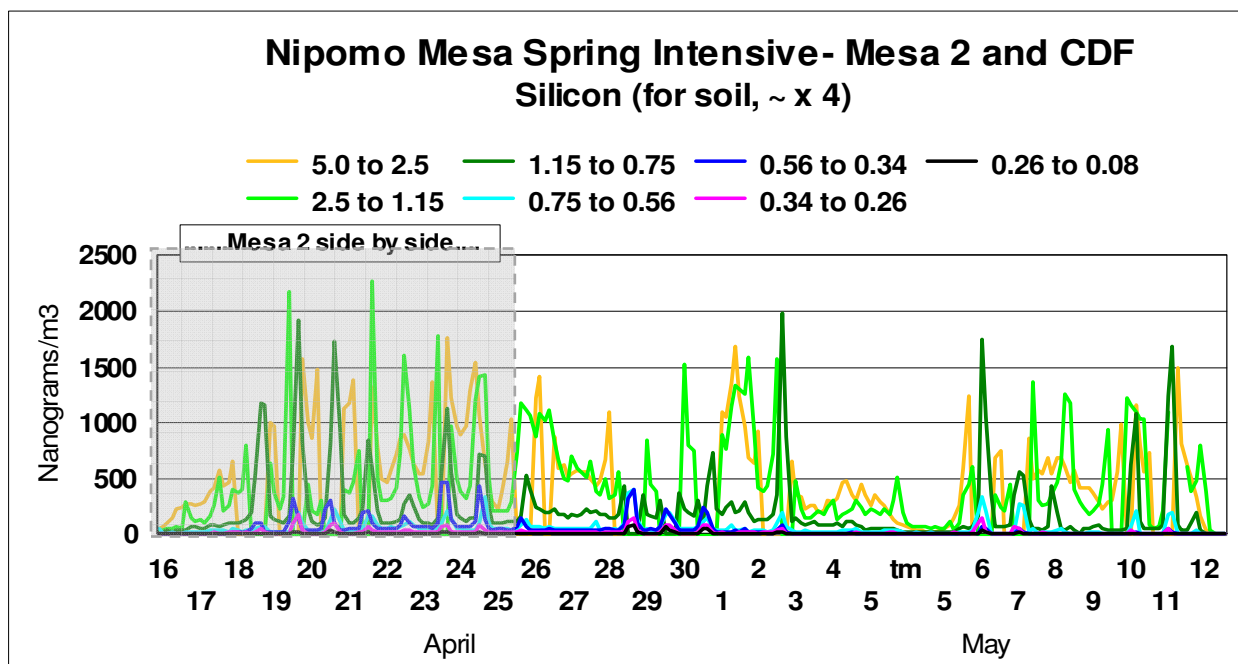


Figure 5.24 – Silicon at the Mesa2 and CDF Sites

Figure 5.24 above presents the silicon mass measured at CDF and the Mesa2 side by side comparisons. The CDF silicon data shows a similar pattern as that from Mesa2. Both sites show significant particle mass below one micron that is absent at all sites not downwind from the SVRA. (Note that no 5-2.5 and 2.5-1.15 micron peaks are present on the highest episode days in Figure 5.24 due to the S-XRF overflow problem.)

5.3.4. Analysis of Fall Mesa 2/Dune Center Comparisons

After evaluating the early mass data, it was deemed important to add a long term sampling site at the Guadalupe Dune Center in Guadalupe (see Figure 5-1). This was done because it was typically downwind of the relatively undisturbed dunes of the Santa Maria oil field, and its easy access allowed longer term sampling than could be performed at the very valuable but labor intensive Oso Flaco site. The Dune Center site is also about the same distance inland as Mesa2, which allows for good comparison between the two sites.

Sampling began in early September and continued through late November, after which dust episodes tend to be less intense and rainfall is to be expected. Most wind/particle episodes occurred in September and October, with low concentrations measured at both sites from late October through November. Figure 5.19 below presents a comparison between the 5.0 to 0.75 micron mass at both sites for the period with most episodes. As shown, aerosol levels measured at Mesa 2 were substantially higher than those at the Dune Center site on all episode days. (Note that the 10 to 5.0 micron particle fraction is not presented here due to its large time averaging, which averages out the peaks and is hard to align with meteorology; the three particle stages summed to calculate the 5.0-0.75 micron fraction are typically 2/3 of the total mass seen in the DRUM.)

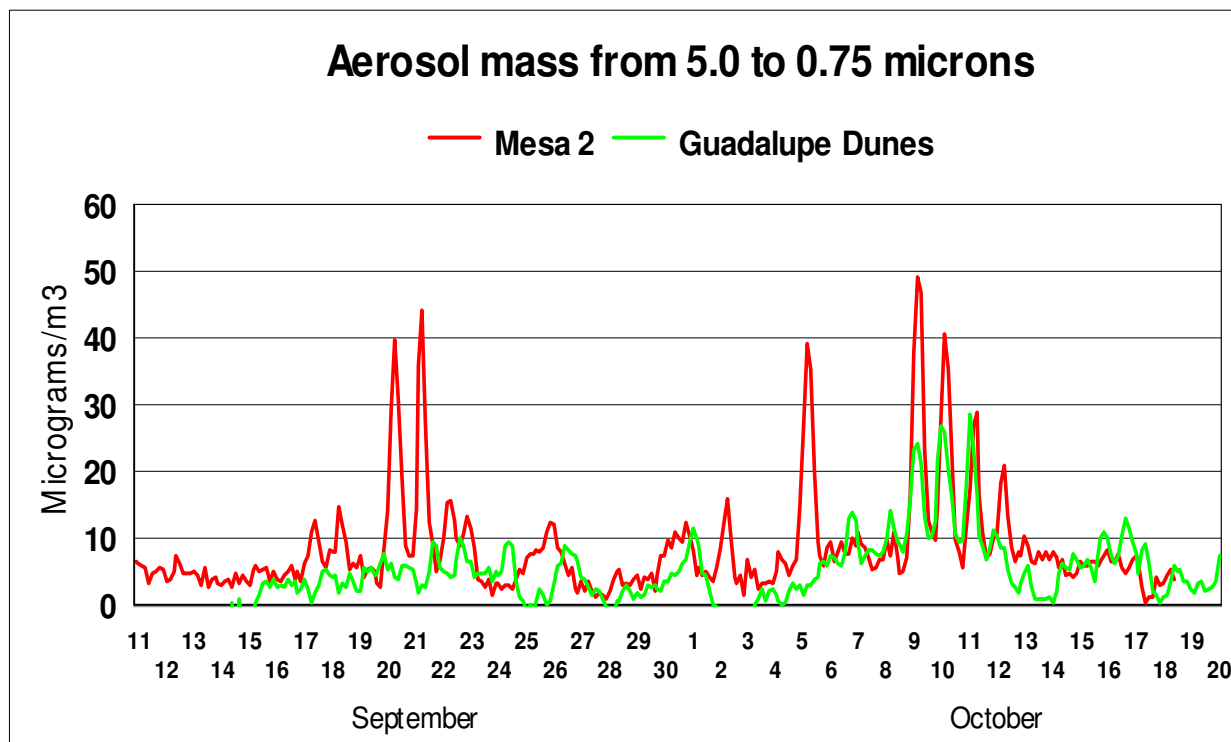


Figure 5.25 - Mesa 2 to Guadalupe Dunes comparison Fall, 2008

Figure 5.26 below present a comparison of chlorine for the two sites. Clearly the Dune Center site is much more impacted by sea salt, likely due to the higher wind speeds recorded at the mouth of the Santa Maria River and/or the slightly lower elevation of the Dune Center site.

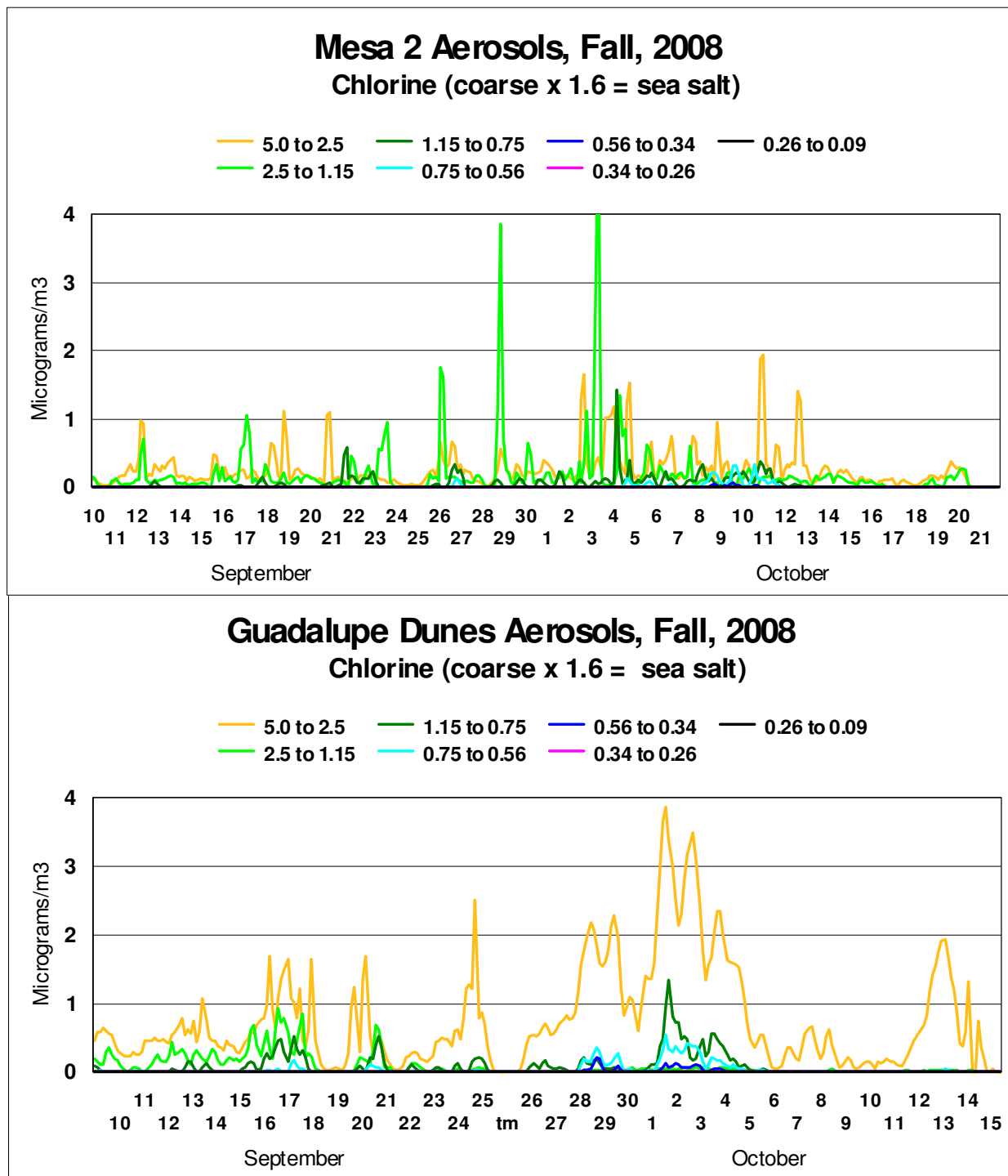


Figure 5.26 - Mesa 2 to Guadalupe Dunes comparison, for chlorine, a tracer of sea salt

Figure 5.27 below compares the amount of silicon mass, a soil tracer, found at Mesa2 to that measured at the Guadalupe Dune Center.

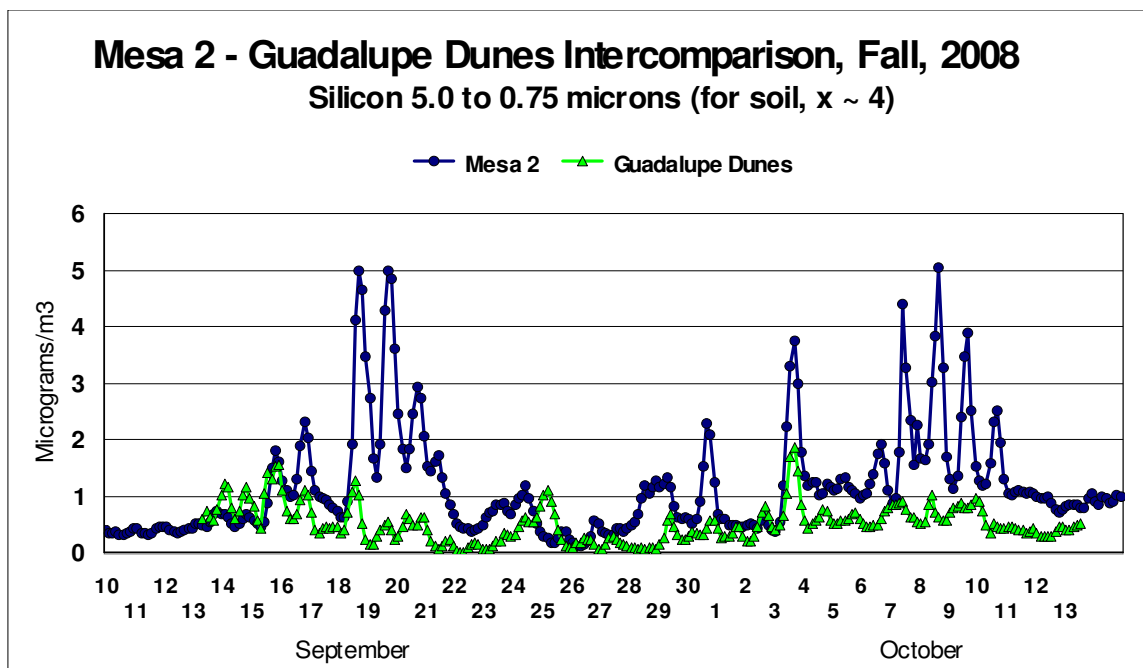


Figure 5.27 - Mesa2 to Guadalupe Dune Center Comparison for Silicon 5-.75 microns

In summary, the Guadalupe Dunes – Mesa 2 summer-fall comparison strongly supports the results of the Spring Intensive, showing that sites with undisturbed sands upwind have far less dust than those sites downwind of disturbed soils.

5.4. Analysis of Soils and Ambient Aerosols Near the ConocoPhillips Petroleum Coke Piles

Many of the tools used by the Delta group for the Phase 2 study also provide information on the potential impact of the ConocoPhillips (COP) petroleum coke storage piles on PM₁₀ levels measured at Mesa 2. The reasons for conducting this part of the investigation include the following:

- The petroleum coke storage site is one of only two uncovered coke storage sites in California
- The COP coke piles are located along the wind trajectory to Mesa 2
- SO₂ emissions from the refinery are recorded at Mesa 2 when their SO₂ suppression systems are inoperable.
- Visual observations and photographs of dust created during transfer of coke to the pile

5.4.1. Soil Analysis in the Vicinity of Petroleum Coke Piles

Heavy oils in California and elsewhere contain sulfur, vanadium and nickel. The latter two in the coarse aerosol modes are robust tracers of coke materials; in the fine modes, they are good indicators of heavy oil combustion. As shown in Figure 5.28 below, analysis of soil samples taken along the entire transect from Mesa 2 to ConocoPhillips shows some enrichment of vanadium over the typical earth crustal average, with the amount growing by a factor of 70% as one approaches the edge of the petroleum coke pile. There is even some modest enrichment of

vanadium in the soil at sites generally upwind of the ConocoPhillips facility. No consistent vanadium enrichment is seen in soil samples from either the Oso Flaco or Bluff transects.

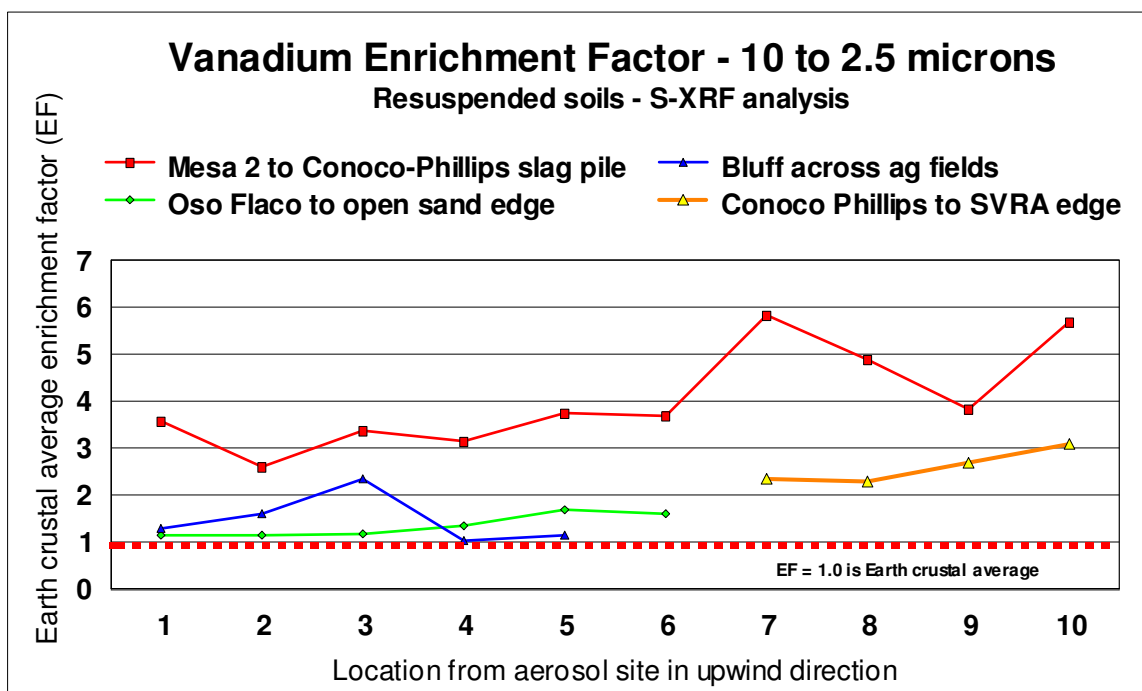


Figure 5.28 – Vanadium Enrichment Factor in Soil Samples

Finding above background levels of vanadium in soils within the vicinity of the petroleum coke piles is not surprising considering the many decades of petroleum coke storage and processing in this area. While this data demonstrates past historical deposition of petroleum derived particles, it does not demonstrate where the particles originated (entrained by the wind or from combustion processes in the refinery), nor the relative contribution of these particles to the elevated ambient PM concentrations measured on the Mesa.

5.4.2. Analysis of Ambient DRUM Data

The DRUM aerosol data at the Mesa 2 site does show minor traces of vanadium, nickel, and sulfur, but the levels are negligible relative to the overall PM₁₀ mass. Figure 5.23 below plots concentrations of very fine (0.34 to 0.26 μm diameter) vanadium, nickel, and sulfur found in the Mesa 2 samples (note the units are in nanograms rather than micrograms). The strong association of vanadium and nickel, and the support of fine sulfur particles, is a signature of operations using heavy crude oil. The levels of these materials, however, are less than $0.001 \mu\text{g}/\text{m}^3$, versus overall PM₁₀ mass levels that range from the 10s to 100s of $\mu\text{g}/\text{m}^3$.

Analysis of Mesa2 and the Dune Center DRUM data from the Fall of 2008 show that vanadium concentrations measured at Mesa2 are 2.5 times higher overall than those measured at the Dune Center site. However, most of the vanadium measured at Mesa2 in the fall period was in the fine particle fraction, as seen in Figure 5.29 below. This indicates the source of this trace amount of vanadium is not the coke piles; rather, it likely originates from a combustion process using heavy oil as fuel.

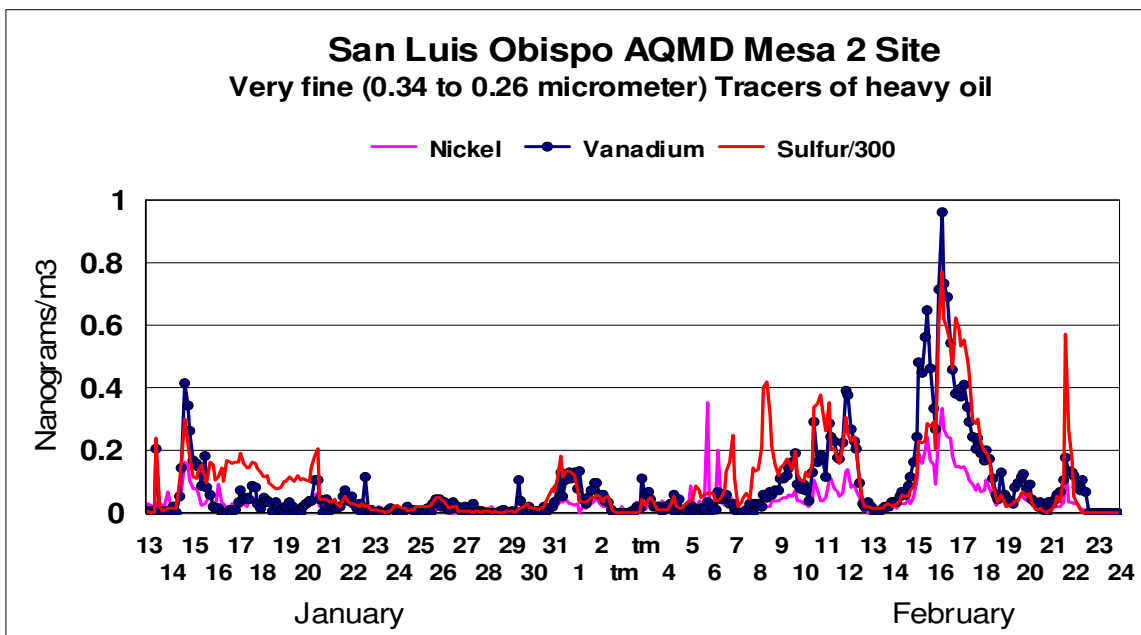


Figure 5.29 – Very Fine Tracers of Heavy Crude Oil

In summary, the measurements and analyses presented above support a definitive conclusion that the ConocoPhillips petroleum coke storage piles were not a significant source of PM₁₀ aerosols during the study period, despite the occurrence of strong winds and several episodes of high PM concentrations.

6 MAJOR FINDINGS, SUMMARY AND CONCLUSIONS

The South County Phase 2 PM Study was designed to achieve two primary goals:

3. To definitively identify the source(s) of the observed high particulate levels on the Nipomo Mesa, including:
 - a. Assessing if the off-road vehicle activity at the Oceano Dunes State Vehicle Recreational Area significantly impacts downwind particulate concentrations; and,
 - b. Determining what, if any, off-site particulate impacts are due to fugitive dust from the petroleum coke piles at the ConocoPhillips Refinery on the Mesa.
 - c. Assessing if agricultural or other activities in the area significantly impact downwind particulate concentrations.
4. To determine the contribution of direct and/or indirect emissions as causative factors in the PM levels observed.

To achieve these goals, the Phase 2 Study incorporated a broad array of both regulatory and research sampling and analysis methods designed to characterize the composition, size distribution, concentration and origin of particulate matter impacting the Mesa. The field measurement portion of the Study was carried out over a 15 month period from January 2008 through March 2009 to ensure the study captured the full range of meteorological conditions and potential source activities that might influence the particulate levels on the Mesa. Nearly two million data points were gathered in this effort, and nearly a year was spent analyzing the data and compiling the results. The data analysis was performed by the three independent research groups involved in designing and implementing the study, followed by peer review of the draft study report by a broad spectrum of scientists and experts in this field.

6.1. MAJOR FINDINGS

The following discussion presents the major findings and conclusions reached in this study, including brief summaries of supporting data from both the Phase 1 and Phase 2 studies.

1) The airborne particulate matter predominantly impacting the region on high episode days does not originate from an offshore source.

- There are numerous particulate monitors located along the coast of California, including at Morro Bay and Grover Beach. None of the measurements at these sites show high PM concentrations during high onshore wind speed conditions, such as those seen on the Nipomo Mesa.
- Grover Beach PM₁₀ data shows a negative correlation to high winds. The only elevated PM₁₀ readings at this site are associated with calm wind periods, likely the result of localized sea salt episodes typical of coastal locations. Further, these calm periods do not correlate to the periods of high PM seen on the Mesa. (See Section 3.1, Figure 3.6)
- Elemental analysis of drum samples from Grover Beach showed high levels of chloride, a tracer for sea salt, and low levels of silica, a tracer for sand and soil. (See Section 5.3.3, Figure 5.13)

2) A localized source of wind blown particulate is present in the Oceano area near Pier Avenue and may be impacting nearby residential neighborhoods.

- Phase 2 study data shows high PM₁₀ concentrations at the Pier Avenue monitoring site on wind event days that cannot be attributed to sea salt. (See Section 3.1, Figure 3.9)
 - Data does not show high PM₁₀ concentrations on wind event days at the Grover Beach site, just 1.3 miles to the north of Pier Ave. (See Section 3.1, Figure 3.6)
 - Drum sampler PM measurements from the Bluff site, 2.7 miles downwind from the Pier Avenue did not see high PM readings during wind event periods, indicating that the Pier Avenue measurements represent a localized source that disperses to insignificant levels farther downwind. (See Section 5.3.2 and Figure 5.12)
 - Visual observations suggest track-out and re-entrainment of sand from vehicles exiting the SVRA at Pier Ave. may be a significant source of particulate here.
- 3) The petroleum coke piles at the ConocoPhillips facility are not a significant source of ambient PM on the Nipomo Mesa.**
- Elemental analysis did not detect significant amounts of the tracer elements for petroleum coke at the Mesa2 monitoring site. (See Section 5.4)
- 4) Upwind agricultural activities are not a significant source of ambient PM on the Nipomo Mesa on high episode days.**
- Drum sampler data showed low PM concentrations at the Bluff Site, directly downwind from agricultural fields. These agricultural fields were actively worked during the measurement period. (See Section 5.3.2 and Figure 5.12)
- 5) The airborne particulate matter impacting the Nipomo Mesa on high episode days predominantly consists of crustal material transported to the Mesa from upwind areas under high wind conditions.**
- Earth crustal elements such as silicon, iron, aluminum and potassium were the predominant compounds found in elemental analysis of filter samples for episode days from the Phase 1 Study. When PM concentrations increased, the earth crustal elements also increased. Sea salt was also present in the samples, consistent with samples taken a few miles from the coast.
 - Elemental analysis from drum sampler data in the Phase 2 Study showed a preponderance of earth crustal elements during episode periods, similar to the Phase 1 analysis; sea salt was also present in the samples.
 - Both the Phase 1 and Phase 2 data showed a strong relationship between high PM concentrations and high wind speed, suggesting wind is the primary emission mechanism for the high particulate concentrations. (See Section 3.1, Figures 3.16, 3.26, 3.32)
 - Study data shows high wind speeds do not result in high PM levels on the Mesa when the soil has been recently moistened by rain, even under the strong northwest wind conditions typically associated with high PM₁₀ readings there. This indicates the wetting of the sand/soil disrupts the emission mechanism. (See Section 3.1, Figure 3.25)
 - Analysis of episode days for this study period showed that for a particular wind speed, higher PM₁₀ concentrations were measured on days with higher temperatures. This suggests that heating of the soil surface, which reduces

moisture content, is a factor that increases PM₁₀ concentrations during a high wind episode. (See Section 3.2.4, Figures 3.60-3.62)

- The sand flux measurements performed with the sensit samplers showed a strong correlation between sand movement on the dunes due to wind and high PM₁₀ readings downwind from the dunes. (See Section 4.0, Figure 4.2)

6) The predominant source of high PM concentrations measured on the Nipomo Mesa are the open sand sheets in the dune area of the coast.

- All of the data results cited under #4 above.
- Directional sampler data from the Phase 1 Study showed that, on sample days with high levels of PM₁₀, the majority of particulate mass occurred when the wind was blowing from the direction of the dunes. (See Section 1.0, Figure 1.1)
- A strong relationship between high PM concentrations and high winds blowing across the open sand sheets was seen in the Phase 2 Study PM₁₀ data. (See Section 3.1, Figures 3.15, 3.25, 3.31)
- Phase 2 study data showed a lack of high PM₁₀ concentrations with high wind speeds from directions that do not pass across open sand sheets. (See Section 3.1, Figures 3.15, 3.25, 3.31, 3.52)
- Zero mass was collected in sandcatchers located in vegetated areas adjacent to open sand sheets. The three cox sandcatchers located upwind from the CDF, Mesa2, and Oso monitoring stations did not collect any mass for the entire month of the sand flux study. This clearly demonstrates that these vegetated areas are not emission sources. (See Appendix B)

7) Open sand sheets disturbed by OHV activity emit significantly greater amounts of particulates than undisturbed sand sheets under the same wind conditions.

- Average PM₁₀ concentrations from the Oso and Dune Center control area monitoring sites were substantially lower than the CDF and Mesa2 monitoring sites during episode periods. This occurred despite the significantly higher wind speeds measured at the control sites on episode days. (See Section 3.2.3, Figures 3.54, 3.55, 3.56, 3.57, 3.58 and 3.59)
- Drum sampler measurements showed average PM concentrations were substantially lower downwind from both north and south control areas than downwind from the SVRA. (See Section 5.3.2 and Figure 5.12)
- Sensit sampler measurements showed significantly higher wind speeds were required for sand movement to occur in the control sand sheet west of the Oso site than in the SVRA, indicating more structural stability in the undisturbed sand sheet. (See Section 4.0, Table 4.2)
- Sand Flux measurements show significantly higher wind erosion rates in the SVRA compared to the control sand sheet west of the Oso site for the same wind speeds. (See Section 4.0, Figure 4.3)
- It was observed that the open sand sheet west of the Oso site had a thin crust on the sand surface that was easily fractured when walking on the sand. This crust was not observed in the SVRA. (See Section 5.2.3 and Figure 5.2)
- On average, high OHV activity days on the SVRA result in higher downwind PM₁₀ concentrations than low OHV activity days. (See Section 3.2.5, Table 3.2)

8) Vegetated dune areas do not emit wind blown particles.

- Phase 2 study data showed a lack of high PM₁₀ concentrations with high wind speeds from directions that do not cross open sand sheets but do pass over vegetated areas of the dunes. (See Section 3.1, Figures 3.15, 3.25, 3.31, 3.52)
- Zero mass was collected in sandcatchers located in vegetated dune areas adjacent to open sand sheets. The three cox sandcatchers located upwind from the CDF, Mesa2, and Oso monitoring stations did not collect any mass for the entire month of the sand flux study. This clearly demonstrates that these vegetated dune areas are not emission sources. (See Appendix B and Section 4)

6.2. SUMMARY AND CONCLUSIONS

The major findings resulting from detailed analysis of the diverse and comprehensive data sets generated during the Phase 1 and Phase 2 South County PM Studies clearly point to OHV activity in the SVRA as the primary contributing factor to the high PM concentrations observed on the Nipomo Mesa.

There are two potential mechanisms of OHV impact. The first is direct emissions from the vehicles themselves, which includes fuel combustion exhaust and/or dust raised by vehicles moving over the sand. Elemental analysis of study data shows combustion exhaust particles are not a significant component in the samples for episode periods. Analysis of SVRA vehicle activity data does show a weak relationship between high PM₁₀ concentrations and high vehicle activity. This indicates a small but measurable direct emissions impact from OHV activity caused by wind entrainment of dust plumes raised by vehicles moving across the open sand. The magnitude of this impact appears to be a small increase in average PM₁₀ concentrations on high OHV activity days compared to low OHV activity days. While important, the study data shows this is not the primary factor responsible for the high PM levels measured downwind from the SVRA.

The second potential mechanism of impact from OHV activities involves indirect emission impacts. Offroad vehicle activity on the dunes is known to cause de-vegetation, destabilization of dune structure and destruction of the natural crust on the dune surface (8). All of these act to increase the ability of winds to entrain sand particles from the dunes and carry them to the Mesa, which is an indirect emissions impact from the vehicles. The data strongly suggests these indirect emissions are the primary cause of the high PM levels measured on the Nipomo Mesa during episode days.

The Phase 2 study data demonstrates that any open sand sheet represents a significant potential emission source of wind blown dust. Even though substantially lower PM concentrations were measured downwind from the undisturbed open sand sheets in the control areas compared to the SVRA, the data clearly shows that even the undisturbed sand sheets are a notable source of PM under high wind conditions. However, study measurements indicate the substantially lower PM emissions from the undisturbed control area dunes result from two important features not found in the SVRA: the presence of an ephemeral crust on the sand surface and a higher density of vegetation.

The crust present on the surface of undisturbed dunes lends considerable stability to the sand, requiring substantially higher wind speeds to move the surface sand particles compared to the SVRA, as demonstrated by the sand catcher data from the control dune sites. Thus, far less sand becomes airborne for a given wind speed at the control site dunes compared to the SVRA. Similarly, the complete lack of sand collected by the sandcatcher located in a vegetated area of

the control site dunes provides a clear demonstration of the ability of vegetation to control wind erosion. The much higher density of vegetation and the presence of an undisturbed crust on the open sand areas of the control site dunes appear to be vital factors that combine to significantly reduce the amount of sand available for wind entrainment there compared to the SVRA.

OHV activity prevents formation of a stabilizing crust in the SVRA through continual disturbance of the sand surface; as noted earlier, the crust present on the control site dunes was easily broken by walking on the sand. Similarly, OHV activity prevents vegetation from growing in the riding area areas of the SVRA, as stated in the State Parks report, “Review of ODSVRA Vegetation Islands”. That study clearly documents that revegetation efforts in unfenced areas have failed, and that fencing to prohibit OHV access is necessary to help generate new vegetation and preserve existing vegetation.

Denuding of vegetation and the resulting increase in the aerial extent of open sand sheets from OHV activity on the SVRA is obviously a significant factor in the level of wind blown sand emissions from that area. Staff discussions with experts (4, 9) on dune morphology and vegetation showed a consensus of opinion that OHV activity has increased the size of open sand sheets in the SVRA. However, they also agree it is not possible to accurately estimate how much smaller the open sand sheets in the SVRA might be today if OHV activity in that area had never occurred.

Regarding the open sand sheets used as control areas (Ten Commandments, Oso and Silver Spur sites), the experts concluded they are likely larger today than they otherwise would be due to past OHV activity prior to the early 1980’s, when the State Parks took control of these areas and prohibited OHV activity in non-designated areas. It is also important to note that some of the dune vegetation in this region is composed of non-native species such as veldt grass. The invasion by non-native species would have occurred regardless of whether OHV activity was present. Thus, even though the vegetation of the area is not “pristine”, it is the current condition of the local environment.

The great success of the re-vegetation efforts undertaken by State Parks provides important insights into the effect of OHV activity in expanding the open sand sheets in the SVRA. Figures 6.1 and 6.2 below present nearly the same aerial view of the southern border of the SVRA, both prior to and after State Parks re-vegetation efforts in this area. Note Oso Flaco Lake in both images as a common point of reference.



Figure 6.1 – 1979 View of Southern Section of SVRA



Figure 6.2 – 2005 View of Southern Section of SVRA

Close inspection of Figure 6.2 shows the fence line limiting OHV activity is also the border between vegetated and non-vegetated areas of the dunes. Much of the vegetated area was replanted by State Parks in their re-vegetation effort; however, some regrowth occurred in these areas prior to any planting efforts, simply by eliminating OHV activity (4). This strongly indicates that much more vegetation and less open sand would be present in the SVRA area in the absence of OHV activity.

In summary, it appears the most significant impact of OHV activity in contributing to high downwind PM levels on the Nipomo Mesa results from denuding of vegetation and prevention of natural crust formation on the sand surface.

7 REFERENCES

1. Glick, R., Phone and Personal Interviews, June 25, 2009 and October 30, 2009.
2. Helium Website, <http://www.helium.com/items/1711426-what-is-the-wind-profile-power-law>
3. Monterey Bay Unified Air Pollution Control District, “Application of ARB’S Exceptional Events Policy to Sea Salt Impacted Exceedances of the State PM10 Standard in the NCCAB”, June 2007.
4. Moss, R. E., Personal Interview August 8, 2008.
5. National Institute of Standards and Technology Website, <http://www.itl.nist.gov/div898/handbook/eda/section3/eda352.htm>
6. San Luis Obispo County Air Pollution Control District, “Nipomo Mesa Particulate Study”, 2007.
7. Santa Barbara County Air Pollution Control District, Air Quality Data Archive.
8. US Environmental Protection Agency Air Quality System Database.
9. U.S. Geologic Survey, “Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Biographies, Extensive Biographies, and Internet Resources”, Open File Report 2007-1353.