

Kettleman City

Community Air Monitoring Plan

California Statewide Mobile Monitoring Initiative (SMMI)















The Statewide Mobile Monitoring Initiative is part of California Climate Investments, a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment — particularly in disadvantaged communities.



Summary

This Community Air Monitoring Plan is prepared under the Statewide Mobile Monitoring Initiative (SMMI), a California Air Resources Board project. The SMMI is a statewide effort to use mobile monitoring methods to gather a comprehensive dataset of criteria pollutants, toxic air contaminants, and greenhouse gases. The SMMI is part of California Climate Investments and aims to reduce greenhouse gas emissions and improve public health, particularly in disadvantaged communities. Aclima, Inc., a California Public Benefit Corporation focused on air monitoring technology, was contracted by the California Air Resources Board to develop and implement Community Air Monitoring Plans using mobile monitoring in 62 Consistently Nominated Communities (CNCs), which have been nominated for the community air protection program, but have not been selected for participation. Resources are needed to address air pollution in these communities.

The primary purpose of the SMMI is to provide better understanding of air pollution in 62 CNCs through mobile monitoring following a rigorously developed community air monitoring plan based on effective and inclusive community engagement.

The purpose of this Community Air Monitoring Plan (CAMP) is to outline the mobile air monitoring that will be conducted in response to air quality issues identified by community outreach in Kettleman City and inform future plans and community actions. This CAMP will outline monitoring objectives that reflect resident concerns about where and what pollution is most impactful. Community voices directed where mobile air monitoring will take place, the monitoring objectives, and where focused pollution studies are needed. This project also seeks to ensure that data is shared in an accessible way with all interested parties, including community members, to support the planning and implementation of emissions reduction actions. Data will be presented in digital format, in physical printout form, and verbally in public webinars.



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List of Abbreviations Used in the Community Air Monitoring Plan

Abbreviations	Term
AMN	Aclima Mobile Node
AMPs	Aclima Mobile Platforms
APCD	Air Pollution Control District
AQS	Air Quality System
ВС	Black Carbon
C2H6	Ethane
CAMP	Community Air Monitoring Plan
CARB	California Air Resources Board
CBOs	Community-Based Organizations
CES	CalEnviroScreen
CDPH	California Department of Public Health
CH4	Methane
CNC	Consistently Nominated Community
CO	Carbon Monoxide
CO2	Carbon Dioxide
EPA	Environmental Protection Agency
GHGs	Greenhouse Gases
LO	Level 0
L1	Level 1
L2a	Level 2a
L2b	Level 2b
L3	Level 3
L4	Level 4



NO Nitric Oxide NOz Nitrogen Dioxide NOx Total Oxides of Nitrogen 03 Ozone PEG Project Expert Group PEL Permissible Exposure Limit PI Principal Investigator PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative TVOC Total Volatile Organic Compounds		
NOx Total Oxides of Nitrogen O3 Ozone PEG Project Expert Group PEL Permissible Exposure Limit PI Principal Investigator PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	NO	Nitric Oxide
O3 Ozone PEG Project Expert Group PEL Permissible Exposure Limit PI Principal Investigator PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	N02	Nitrogen Dioxide
PEG Project Expert Group PEL Permissible Exposure Limit PI Principal Investigator PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	NOx	Total Oxides of Nitrogen
PEL Permissible Exposure Limit PI Principal Investigator PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	03	Ozone
PI Principal Investigator PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	PEG	Project Expert Group
PM2.5 Fine Particulate Matter PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	PEL	Permissible Exposure Limit
PML Partner Mobile Laboratory QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	PI	Principal Investigator
QA Quality Assurance QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	PM2.5	Fine Particulate Matter
QC Quality Control REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	PML	Partner Mobile Laboratory
REL Reference Exposure Level RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	QA	Quality Assurance
RFP Request for Proposal SMMI Statewide Mobile Monitoring Initiative	QC	Quality Control
SMMI Statewide Mobile Monitoring Initiative	REL	Reference Exposure Level
<u> </u>	RFP	Request for Proposal
TVOC Total Volatile Organic Compounds	SMMI	Statewide Mobile Monitoring Initiative
	TVOC	Total Volatile Organic Compounds



What is the reason for conducting air monitoring?

1. Community partnership approach

The Statewide Mobile Monitoring Initiative (SMMI) prioritizes forming strong community partnerships from the outset to guide the development of Community Air Monitoring Plans (CAMPs).

The SMMI <u>Community Engagement Plan</u> (Appendix A) is central to the success of the SMMI, emphasizing that communities must have a leading role in design, engagement, and implementation for the initiative to be successful. Aclima has implemented a co-leadership model with existing community experts and co-ownership with communities. This model is informed by CARB's <u>Community Engagement Model</u>, <u>the People's Blueprint</u>, <u>CARB's Blueprint 2.0</u>, and <u>Facilitating Power's Spectrum of Community Engagement to Ownership</u>. The goals of the community partnership approach include:

- 1. Develop and implement CAMPs that are responsive to the air quality concerns and needs of community members in pollution-overburdened areas.
- 2. Define monitoring objectives that reflect resident concerns about where and what pollution is most impactful. Community voices will direct where mobile air monitoring takes place, the monitoring objectives, and where focused pollution studies are needed.
- **3.** Build community capacity to interpret mobile air quality data and help translate data into actions for emissions reduction and public health improvement.
- **4.** Ensure that data is shared in an accessible way with all interested parties, including community members, to support the planning and implementation of emissions reduction actions.

Several groups play integral roles in the implementation and success of the SMMI. The SMMI Project Expert Group (PEG) includes community members, representatives from local air districts, community-based organizations (CBOs), and academia. Over 50 percent of the PEG comprises community members or representatives of CBOs. Engagement Leads, who are trusted community organizations, are subcontracted to lead and facilitate community engagement in the 62 Consistently Nominated Communities (CNCs). These Engagement Leads work closely with Aclima and the PEG to ensure CAMPs are responsive to community needs and that engagement is culturally and linguistically relevant. The California Air Resources Board (CARB) funds and oversees the SMMI. Aclima, as the contracted air monitoring technology company, is responsible for conducting community engagement and mobile monitoring. The project aims for a collaborative process where community members actively contribute to defining air monitoring objectives and the scope of actions.

1.1 Project Team Roles and Responsibilities for Community Partnerships

The core project team is made up of paid staff at a number of different organizations. These are described in Table 1.1. Additional project roles and responsibilities are outlined in Section 5.



Engagement Leads: Aclima has subcontracted with trusted community-based organizations or leaders to lead and co-manage community engagement efforts in the designated communities. These Engagement Leads are responsible for designing and implementing engagement strategies, conducting outreach, and working with Aclima to translate community knowledge (e.g., air pollution concerns) into responsive CAMPs. Some organizations may cover more than one community. Engagement Leads distribute an air pollution concerns survey and lead and conduct outreach for two community meetings, which serve as forums for community members and other interested parties to discuss local air pollution concerns and define where they would like air quality monitoring to occur. The Engagement Lead is also responsible for summarizing these meetings for Aclima, who then integrates community concerns into the CAMP. Engagement Leads serve as a conduit between community members and Aclima and CARB, helping to raise community questions and concerns and communicating project updates to the community.

Project Expert Group (PEG): A cross-sector group of representatives from local air districts, community-based organizations, academia, and residents from overburdened communities that guides community engagement and decision-making for this project. Over 50 percent of the Project Expert Group is composed of community members or representatives of community based organizations. The PEG serves as a trusted group of experts to help define and steer the initiative and ensure it meets community needs. PEG members are responsible for attending eight meetings during the project period, and completing six assignments that help inform and steer the project. Specifically, PEG members helped shape the content of the Community Engagement Plan, served on the selection committee for Engagement Leads, and shaped the methodology for allocating monitoring miles to each project community. Outside of meetings and assignments, Aclima requests that PEG members support decision-making in areas relevant to their professional and lived experiences.

Aclima's Project Team: Aclima monitors local engagement strategies and supports Engagement Leads by offering technical expertise, data interpretation, outreach materials, and meeting support. Aclima is responsible for organizing and facilitating all PEG meetings and managing PEG assignments.

Table 1.1: Project teams and contact details

Organization/team	Contact details	Type of Support Offered
CARB	smmi@arb.ca.gov	All project questions after the project has completed (May 2026)
Aclima	carb-team@aclima.earth	Monitoring updates and CAMP questions during the project period (through May 2026)
Project Expert Group	carb-team@aclima.earth	Questions about community engagement framework and statewide engagement opportunities during the project period (through May 2026)
UNIDOS Network (Engagement Lead)	miguel@unidosnetworkinc.org	Community engagement questions during the project period (through May 2026)



1.2 SMMI resources

The CARB SMMI website (https://ww2.arb.ca.gov/statewide-mobile-monitoring-initiative) details the objectives of the SMMI; the size and recipient of the contract award and collaborations with research institutions. Additionally the website outlines community engagement efforts, public participation opportunities, and the development of air monitoring plans. The website provides access to summary documents including the original CARB Request for Proposal (RFP), a project summary one-pager, FAQs, and Aclima's technical proposal.

The Aclima SMMI website (https://aclima.earth/ca-smmi) provides an overview of the SMMI. It explains the community engagement approach, project scope, monitoring technology and approach, and data availability. The website also provides access to the joint Aclima-CARB press release.

1.2.1 Engagement tools

The online and offline tools used to support community engagement as part of CAMP development include:

Online

- Aclima Project Website: For updates, resources, and contact information.
- Air Pollution Concern GeoSurvey: Online survey to gather community input on air quality concerns.
- Broad Area Monitoring Selection tool for community members to select the boundaries for broad area monitoring given allocated driving resources for each community
- Social Media Graphics: Customizable graphics and text for outreach efforts.
- Meeting Summary Report: Document template for documenting meeting content.

Offline

- Physical Flyers: Customizable flyers for distribution at community hubs.
- Community Air Monitoring Plan Development Handout: Infographic detailing the Community Air Monitoring Plan development process.
- Door-to-door outreach (in some communities)
- Phone call/text message outreach (in some communities)
- Radio announcements and/or project interviews (in some communities)

1.3 Statewide community meetings

The Community Engagement Plan includes the following statewide community meetings:

- Pre-meeting / Introduction to project: An online meeting introducing the project and answering questions, held at the air district level.
- Meeting 1 / First Draft Community Air Monitoring Plan Boundary: A hybrid (in person and online) meeting
 to identify community air quality concerns, monitoring objectives, monitoring areas, and community roles in
 the project.
- Meeting 2 / Affirming Community Air Monitoring Plan: A hybrid (in person and online) meeting to confirm monitoring areas and review draft Community Air Monitoring Plan(s).



• Meeting 3 (series) / Project Results: A series of online meetings, organized geographically by air district (or at a sub-district level if necessary), to explain project results, answer questions, and discuss next steps.

1.4 Engagement during and after monitoring

There will continue to be opportunities for the public to engage with the SMMI throughout monitoring and after completion of monitoring.

During the monitoring period:

- Project website: use the project website to access updates, resources, and contact information
- Webinars and training: participate in online sessions about data literacy, interpretation, emissions reduction success stories, and air management policies/regulations
- Community-specific project pages (via project website): Find updates, contact information, and leave comments/feedback for each Consistently Nominated Community on the project website
- Continued communication: receive email updates on monitoring progress (if contact information was provided during the engagement process).
- Continued communication: receive email updates on progress towards monitoring completion (if contact
 information was provided during the engagement process). For example, monthly event notifications
 summaries (see Section 14.1), broad area monitoring progress, and locations where PMLs have completed
 monitoring.
- Office hours: Attend online office hours to ask project-related questions of the Aclima team

After the monitoring period:

- Publicly available data hosted by CARB
- StoryMaps: Explore interactive data visualizations for each Consistently Nominated Community
- Project Results meeting: Attend online meetings to learn about project results, ask questions, share experiences, and discuss next steps. These meetings will be held in English with Spanish interpretation and designated Spanish breakout rooms.
- Post-Meeting Survey: Provide anonymous feedback on the project and engagement process after the Project Results Meetings.

2. State the community-specific purpose for air monitoring

The primary purpose of the SMMI is to develop and implement Community Air Monitoring Plans that are responsive to the air quality concerns of community members and other stakeholders in the 62 CNCs. These communities have been consistently nominated by air districts, CBOs, and community members as needing extra attention to address high levels of air pollution.

Community air monitoring generally falls into two types of air pollution concerns:

 Ambient air quality monitoring - measure the levels of relevant air pollutants to understand which areas of the community are experiencing disproportionate or unequal impacts from air pollution as well as evaluate measured concentrations against existing standards and historical information.



2. Stationary source monitoring - measuring air pollutants near **specific stationary emission sources** (e.g. industrial facilities) to better understand and characterize the air within the vicinity of these known or suspected sources.

This air monitoring plan will address these monitoring aims - to identify and characterize areas experiencing disproportionate air pollution impacts and specific air pollutant emission sources - by focusing on specific sources and air pollution concerns identified by the community. Residents and other interested parties' knowledge were solicited through community meetings and surveys to understand the community's pollution burdens. A specifically designed Air Pollution Concerns Survey was used to help identify priority air pollution concerns in each community and collect detailed information to guide monitoring objectives. The CAMPs will define where mobile air monitoring takes place, what the monitoring objectives are, and where focused pollution studies are needed, all directed by community voices.

2.1 Kettleman City community profile



Figure 2.1: Preliminary CNC Boundary: Kettleman City municipal boundary

Kettleman City is an unincorporated community of roughly 900 residents in Kings County. Nestled at the base of Kettleman Hills in the western San Joaquin Valley, the city occupies a mere 0.2 square miles, but its location is significant as it sits on the intersection of Interstate 5 and State Route 41.

The population of Kettleman City is overwhelmingly (~96%) Latino, and over 70% of households speak a language other than English at home (predominantly Spanish). Economically, the community faces intense pressure: the median household income is roughly \$49,000, significantly lower than the state's average, and ~27% of the population lives in poverty. Across the whole census tract, 18% of people are considered housing burdened.



Air quality challenges in Kettleman City are also substantial. The city experiences pollution from the Kettleman Hills hazardous waste landfill, the consistent diesel truck traffic on the major highways, the pesticides used on the nearby agricultural fields, and legacy oilfield operations. These sources contribute to a concerning abundance of air pollutants in the region. CalEnviroScreen 4.0 indicators for the broader monitoring area place Kettleman City at the 71st percentile for ozone levels, the 60th percentile for particulate matter below 2.5 microns (PM_{2.5}) levels, and the 92nd percentile for pesticides, leaving the census tract in the top 8% statewide for overall pollution burden. As a result, the area experiences elevated rates of asthma (77th percentile), cardiovascular disease (96th percentile), and low birth weight (60th percentile). Alongside these metrics, community-led research by the UNIDOS Network has documented resident reports of irritation to the eyes, nose, and throat on account of the local air pollution. Furthermore, research by the California Department of Public Health (CDPH) and independent investigations have confirmed that the community's exposure to industrial pollution, landfill operations, and contaminated drinking water presents significant health risks, even when causation for specific health outcomes cannot be definitively established. For example, between 1987 and 2008, the community experienced a troubling cluster of birth defects¹².

Kettleman City represents a classic environmental justice case study, facing overlapping environmental burdens. First, the community experiences simultaneous exposure to multiple pollution sources, creating environmental conditions more severe than any single source would indicate. Secondly, despite documented pollution concerns, regulatory oversight has been inconsistent and often inadequate. Moreover, the geographic isolation of the city combined with its unincorporated status limits its visibility, political leverage, and ability to exert local control over land use and environmental decisions. Finally, linguistic barriers challenge the population's ability to acquire technical expertise, navigate regulatory processes, and obtain legal representation. It is on account of these socioeconomic challenges and environmental vulnerability that the entirety of Kettleman City is considered an SB 535 designated disadvantaged community.

2.2 Kettleman City community-specific motivations for air monitoring

Community-identified air pollution concerns

To identify the community-specific motivations for air monitoring in Kettleman City, Aclima worked with UNIDOS Network to gather air quality and emission source concerns directly from the community. An SMMI Air Pollution Concerns survey was circulated by email, distributed in person community meetings, and made available during other events in the community. In addition, UNIDOS Network collected air pollution concerns voiced during community meetings in support of the SMMI effort.

The chief concern identified by community members was the Kettleman Hills Hazardous Waste Facility. This facility is the largest toxic waste landfill in the Western United States, and it has a history of documented violations of environmental regulations. Situated only five miles southwest of the city, the transport of wind-blown dust and VOCs from the site presents a continued peril for the residents of Kettleman City. Additionally, vehicle traffic on Interstate 5 and Highway 41 produces a significant amount of emissions. Focusing particular attention to heavy diesel trucks, 42% of residents specifically cite them as a health concern, primarily on account of their contribution to diesel PM and ozone formation. Agricultural operations are also highly relevant due to dust production, seasonal burning of agricultural waste, and pesticide applications (which 80% of residents cite as a concern). Finally, community

¹ https://www.latimes.com/local/la-me-kettleman-city8-2009dec08-story.html

² https://birthdefects.org/california-birth-defect-cluster/



members have identified oil and gas infrastructure, such as Chevron's abandoned operations, as contaminated sites that continue to emit methane and VOCs.

In addition to those summarized above, other specific concerns identified through community engagement are included in Table 2.1 below. These concerns were compiled from community members during community meetings as well as through the SMMI Air Pollution Concerns Survey.

Table 2.1: Specific concerns identified through community engagement. Details about community concerns are direct quotes from the community member concern submissions.

Location and Concern	Details		
Roadways (Lat/Lon: 36.011686, -119.959412)	One response mentioned "It's mostly in the hills".		
General	Adjacent to the school and park		
	Air, ground, and water pollution		
	Toxic Waste Landfill, operated by Waste Management.		
	Bad air quality, bad water quality in area. Health effects include asthma, cancers, birth defects		
	Especially during windy conditions.		
Milham Avenue	From the community to the California Aqueduct. Nearby Ag and the landfill.		
	Dust, pesticide drift, poor air and water quality. Number of community members affected by valley fever.		
Sandridge farm along Edwards Street	Along the pesticide-treated orchards bordering residential homes.		
Becky Pease Street - Location of the benzene and arsenic stripping site	Standard oil benzene and arsenic stripping exhaust.		

Social and Cultural Characteristics

Kettleman City exhibits strong social cohesion and cultural identity despite challenging circumstances:

- Community Organization: Long history of grassroots activism and community mobilization
 - Historical Environmental Activism: In the late 1980s, residents successfully mobilized to defeat California's first proposed toxic waste incinerator
- Key Community Organizations: UNIDOS Network Inc. and El Pueblo Para el Aire y Agua Limpia de Kettleman City serve as anchors for community advocacy
- Governance Structure: Unincorporated status means residents lack local government representation, relying instead on Kings County for services and decision-making
- Infrastructure Challenges:



- No grocery store within community boundaries
- No emergency medical services
- Limited public transportation options
- Inadequate road infrastructure (94.3% of residents support road improvements)
- Lack of pedestrian infrastructure (86.1% support sidewalk construction)

The community's cultural heritage is rooted in agricultural work and Latino traditions, with strong family networks that provide social support despite economic hardship. Community leaders like Miguel Alatorre (Executive Director of UNIDOS Network) and Brian Cadena (Programs Development Director) are themselves residents, ensuring advocacy efforts remain grounded in local knowledge and experience.

Funding and Partnerships

UNIDOS Network has built a strong foundation of support for its environmental justice initiatives:

- Statewide Collaboration: UNIDOS has established partnerships with organizations across California working in environmental justice and community air science and monitoring
- Knowledge Exchange: The organization participates in statewide networks that share best practices and technical expertise for community air monitoring
- Capacity Building: Partnerships provide training and support for local residents to interpret and act on air quality data

Emissions Reduction Strategies

Several initiatives are being developed to address air pollution sources:

- Regulatory Engagement:
 - Community participation in permitting processes for the Kettleman Hills facility
 - Advocacy for stricter enforcement of existing regulations
 - Engagement with San Joaquin Valley Air Pollution Control District regarding regional air quality plans
- Infrastructure Improvements:
 - Road paving to reduce dust pollution (identified as priority by 94.3% of residents)
 - Advocacy for vegetative barriers along transportation corridors
 - o Proposals for truck route modifications to Petroleum
 - Reduce residential exposure
- Community Education and Protection:
 - Development of air quality alert systems
 - Distribution of information about protective measures during high pollution events
 - Indoor air quality improvement recommendations
- Long-term Planning:
 - Incorporation efforts to enable local control over land use and environmental decisions
 - o Development of community-centered environmental justice policies
 - o Engagement with California's AB 617 Community Air Protection Program

Top pollution sources identified via emission inventories



Aclima scientists gathered important sources from available emission inventories, focusing on major polluting facilities and AB2588 Air Toxics Hot Spots. Table 2.2 lists the top five AB2588 Air Toxics Hot Spots within or near the monitoring area boundary (up to 200 meters outside), ranked by total toxicity-weighted emissions (TWE) across chronic, cancer-causing, and acute categories. This table details each facility's name, geographic coordinates (longitude and latitude), a description of its business or service, and the reported pollutants. These facilities include a mix of industrial waste processing, telecommunications infrastructure, transportation services, fuel stations, and public utilities that collectively contribute to local air pollution in Kettleman City. The most prominent emitter is Chemical Waste Management, Inc., a hazardous waste landfill located just outside town, which reports releases of an extensive suite of air toxics including heavy metals (like lead, arsenic, and chromium), VOCs, dioxins and furans, and diesel PM. In addition, diesel combustion remains a recurring concern across multiple sites, including freight and courier services (e.g., FedEx Freight, California Overnight), cell tower backup generators operated by Verizon and AT&T, and public entities like the County of Kings and Kettleman City Community Services District. Several gasoline service stations in the area, such as those operated by Chevron and Shell, report emissions of benzene, toluene, xylene, and other fuel-related VOCs. Together, these operations point to a layered pollution burden made up of both hazardous industrial emissions and more diffuse sources tied to transportation and fuel combustion.

Table 2.2 Top ten AB2588 Air Toxics Hot Spots located within and in the vicinity of the monitoring area boundary for Kettleman City (up to 6 km outside the boundary), as defined by the total toxicity-weighted emissions (TWE) for chronic, cancer causing, and acute categories combined.

Facility Name	Longitude	Latitude	Description	Reported Pollutants
CHEMICAL WASTE MANAGEMENT, INC	-120.0095	35.9632	REFUSE SYSTEMS/ELECTRIC,GAS ,SANITARY SERVICES/SANITARY SERVICES/REFUSE SYSTEMS	Antimony, Thallium, Aluminum, p-Cresol, Selenium, Chromium, 1,2-Dichloroethene {1,2-Dichloroethylene} {DCE}, Dichlorodifluoromethane {Freon 12} {CFC-12}, Ethylene dichloride {EDC}, Vinyl chloride, Toluene, m-Xylene, 2,4-Dichlorophenol, Naphthalene, Vanadium (fume or dust), Arsenic, Methyl isobutyl ketone {Hexone} {MIBK}, Fluorene, Acetaldehyde, Styrene, Mercury, Perchloroethylene {Tetrachloroethene}, 2,4-Dimethylphenol {2,4-Xylenol}, 1,3-Butadiene, Methylene chloride {Dichloromethane}, Vinylidene chloride, Total Pentachlorodibenzofuran, Diesel engine exhaust, particulate matter (Diesel PM), Benzo[e]pyrene, 1,1-Dichloroethane, PAHs, total, w/o individ. components reported [Treated as B(a)P for HRA], Xylenes (mixed), Propylene, Ethyl chloride {Chloroethane}, Carbonyl sulfide, Chlorodifluoromethane {Freon 22} {HCFC-22}, Dibenzofurans (chlorinated) {PCDFs} [Treated as 2378TCDD for HRA], p-Dichlorobenzene, 1,2,3,7,8,9-Hexachlorodibenzofuran,



Cadmium, Di(2-ethylhexyl) phthalate {DEHP}, Phosphorus, 1,4-Dioxane, Chlorine, Hydrogen sulfide, Dibromochloromethane {Chlorodibromomethane} {DBCM}, Benzo[q,h,i]perylene, Cumene, 1,1,2-Trichloroethane, Acetonitrile, Phenol, Ammonia, Bromoform, Isopropyl alcohol, Isoprene, except from vegetative emission sources, Chrysene, Fluoranthene, Phthalic anhydride, Copper, Acrolein, 1,1,2,2-Tetrachloroethane, 1,2,3,4,6,7,8-Heptachlorodibenzofuran, Diethyl phthalate, Zinc, Aldrin, 2,2,4-Trimethylpentane, 1,2,4-Trichlorobenzene, Hexane {n-Hexane}, o-Cresol, Anthracene, Acenaphthene, n-Butyl alcohol, Methanol, Ethylene dibromide (EDB), Total Heptachlorodibenzofuran, Barium, Methyl chloroform {1,1,1-Trichloroethane}, Dioxins, total, with individ, isomers also reported {PCDDs}, Ethyl benzene, Biphenyl, Methyl chloride (Chloromethane), Cobalt, Molybdenum trioxide, Lindane {gamma-Hexachlorocyclohexane}, Heptachlor epoxide, Chlorobenzene, Formaldehyde, beta-Hexachlorocyclohexane, Total Heptachlorodibenzo-p-dioxin, Trichloroethylene {TCE}, Nickel, Lead, Chromium, hexavalent (& compounds), Benzo[b]fluoranthene. Pyrene. Methoxychlor, 1,2,3-Trichloropropane, o-Xylene, Bromodichloromethane {BDCM}, 2,3,4,7,8-Pentachlorodibenzofuran, Total Hexachlorodibenzo-p-dioxin, Beryllium, Carbon tetrachloride, 1,2,4-Trimethylbenzene, Chloroform, Carbon disulfide, Cyclohexane, Methyl ethyl ketone {2-Butanone}, Heptachlor, Manganese, 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin, Silver, alpha-Hexachlorocyclohexane, Hexachlorobutadiene, 1,2,3,4,7,8-Hexachlorodibenzofuran, 1,2,3,4,6,7,8,9-Octachlorodibenzofuran. Acenaphthylene {Cyclopenta[de]naphthalene}, Bromine, Chlorinated Fluorocarbon (CFC-113) {1,1,2-Trichloro-1,2,2-trifluoroethane}, 2,3,4,6,7,8-Hexachlorodibenzofuran, Benzene, Phenanthrene, Benzyl chloride,



			Methyl tert-butyl ether {MTBE}, 2,4-Dichlorophenoxyacetic acid {2,4-D}, Aniline, Acetophenone, 1,2,3,7,8-Pentachlorodibenzo-p-dioxin, Methyl bromide {Bromomethane}, Sulfates, 1,2,3,4,7,8,9-Heptachlorodibenzofuran, Allyl chloride, Methylene bromide, 1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin, 2,3,7,8-Tetrachlorodibenzo-p-dioxin, Benz[a]anthracene, m-Cresol, 2-Methylnaphthalene, Benzo[a]pyrene, Total Tetrachlorodibenzofuran, 2,3,7,8-Tetrachlorodibenzofuran, 1,2,3,6,7,8-Hexachlorodibenzofuran, Benzo[k]fluoranthene, Total Hexachlorodibenzofuran, Total Pentachlorodibenzo-p-dioxin, Phosgene, 1,2,3,7,8-Pentachlorodibenzofuran
-119.9538	35.9897	COURIER SERVICES, EXC BY AIR/TRUCKING AND WAREHOUSING/TRUCK NG,COURIER SVCS, EX. AIR/	Diesel engine exhaust, particulate matter (Diesel PM)
-120.0156	35.9661	RADIOTELEPHONE COMMUNICATIONS/COM MUNICATIONS/TELEPHO NE COMMUNICATIONS/	Diesel engine exhaust, particulate matter (Diesel PM)
-119.9647	36.0073	WATER SUPPLY/ELECTRIC,GAS,S ANITARY SERVICES/WATER SUPPLY/WATER SUPPLY	Diesel engine exhaust, particulate matter (Diesel PM)
-119.9596	35.9889	TELEPHONE COMMS, EXC RADIO/COMMUNICATIO NS/TELEPHONE COMMUNICATIONS/	Diesel engine exhaust, particulate matter (Diesel PM)
-119.9617	36.0086	TELEPHONE COMMS, EXC RADIO/COMMUNICATIO NS/TELEPHONE COMMUNICATIONS/	Diesel engine exhaust, particulate matter (Diesel PM)
-119.9595	35.9870	GASOLINE SERVICE STATIONS/AUTO DEALERS,GAS SERVICE STAS/GASOLINE SERVICE	Xylenes (mixed), Toluene, Benzene, Propylene, Hexane {n-Hexane}, Naphthalene, Ethyl benzene
	-120.0156 -119.9647 -119.9596	-120.0156 35.9661 -119.9647 36.0073 -119.9596 35.9889 -119.9617 36.0086	BY AIR/TRUCKING AND WAREHOUSING/TRUCK NG, COURIER SVCS, EX. AIR/ -120.0156 35.9661 RADIOTELEPHONE COMMUNICATIONS/COM MUNICATIONS/TELEPHO NE COMMUNICATIONS/ -119.9647 36.0073 WATER SUPPLY/ELECTRIC, GAS, SANITARY SERVICES/WATER SUPPLY/WATER SUPPLY -119.9596 35.9889 TELEPHONE COMMS, EXC RADIO/COMMUNICATIONS/ -119.9617 36.0086 TELEPHONE COMMS, EXC RADIO/COMMUNICATIONS/ -119.9595 35.9870 GASOLINE SERVICE STATIONS/AUTO DEALERS, GAS SERVICE STAS/GASOLINE



			STATIONS/GASOLINE SERVICE STATIONS	
COUNTY OF KINGS	-119.9601	36.0070	GENERAL GOVERNMENT, NEC/EXEC,LEGISLATIVE, GENERAL GOV./OTHER GENERAL GOVERNMENT/OTHER GENERAL GOVERNMENT	Diesel engine exhaust, particulate matter (Diesel PM)
SHELL	-119.9591	35.9873	GASOLINE SERVICE STATIONS/AUTO DEALERS,GAS SERVICE STAS/GASOLINE SERVICE STATIONS/GASOLINE SERVICE STATIONS	Ethyl benzene, Xylenes (mixed), Toluene, Hexane (n-Hexane), Propylene, Naphthalene, Benzene
CALIFORNIA OVERNIGHT	-119.9631	35.9889	LOCAL TRUCKING,WITHOUT STORAGE/TRUCKING AND WAREHOUSING/TRUCK NG,COURIER SVCS, EX. AIR/LOCAL TRUCKING WITHOUT STORAGE	1,1,2,2-Tetrachloroethane, Isobutyraldehyde, Naphthalene, Chloroform, Vinyl chloride, 1,3-Dichloropropene, Chlorobenzene, Ethylene dibromide {EDB}, Styrene, Formaldehyde, Methanol, 1,2-Dichloropropane, Diesel engine exhaust, particulate matter (Diesel PM), Acetaldehyde, Xylenes (mixed), Ethylene dichloride {EDC}, Methylene chloride {Dichloromethane}, Ethyl benzene, 1,3-Butadiene, Benzene, 1,1-Dichloroethane, PAHs, total, w/o individ. components reported [Treated as B(a)P for HRA], Toluene, Acrolein, Carbon tetrachloride, 1,1,2-Trichloroethane

Past and ongoing air quality measurements and studies

There are no active regulatory ambient air monitoring stations in Kettleman City or the immediate vicinity. The closest site is located at 16875 4th Street, Huron, approximately 15 miles to the northwest (est. 2009). It is managed by the San Joaquin Valley Unified Air Pollution Control District and measures $PM_{2.5}$. Another site is also located roughly 20 miles away, at 17225 Jersey Ave in the Santa Rosa Rancheria reservation (est. 2006). Managed by the Santa Rosa Indian Community, this latter site measures PM_{10} and O_3 at the regional scale. These stations are part of the national regulatory network overseen by the USEPA in support of the federal clean air act. The measurements from the stations are intended to represent regional air quality and demonstrate compliance with regional air quality standards.





Figure 2.2: Map of the preliminary Kettleman City CNC boundary and the nearest US EPA Air Quality System (AQS) monitoring sites. The Huron AQS site is located at 16875 4th Street, Huron, approximately 15 miles to the northwest. This site was established in 2009 and monitors Particulate Matter less than 2.5 microns in diameter ($PM_{2.5}$). The Santa Rosa Rancheria site, about 19 miles to the northeast, is located at 17225 Jersey Ave in Lemoore. The site has measured ozone (O_3) and PM_{10} since 2006.

Despite significant air quality concerns, Kettleman City has historically lacked adequate monitoring infrastructure. Still, the risks resulting from pollutant exposure have long been investigated by the community as well as academic and industry practitioners, and recent and planned initiatives aim to continue addressing this gap.

From 2006 to 2009, a team at UC Davis, funded by California's Department of Pesticide Regulation, conducted a detailed pesticide drift exposure modeling <u>study</u> focused around Kettleman City. Using the EPA's ISCST3 atmospheric dispersion model, researchers simulated air concentrations of 19 commonly used agricultural pesticides within an 8-km radius of the community. The results showed two instances, both involving methyl isothiocyanate, a fumigant used in soil fumigation, where modeled concentrations exceeded health-based screening thresholds. While overall lifetime exposure risks were deemed low, the study emphasized the potential for acute exposure peaks during pesticide applications, underscoring the need for targeted communication and on-site safety practices when fumigants are used near populated areas.

In parallel, from 2006 onwards, Waste Management's Kettleman Hills hazardous waste facility ran an ambient air monitoring <u>program</u> with three perimeter stations at the request of the Department of Toxic Substances Control under Resource Conservation and Recovery Act permits. Over more than 140 monitoring events, analyses consistently showed that pollutant levels, including organic compounds, metals, and particulates, matched regional background values and did not pose incremental health risks to nearby residents. These findings led regulatory

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agencies to conclude that the hazardous waste site does not currently contribute meaningful additional exposure to the local community, though environmental justice advocates have called for ongoing scrutiny and transparency.

In 2010 an air quality assessment in Kettleman City investigated potential links to increased birth defects by monitoring various airborne pollutants. A potential benzene exposure of concern was identified near one drinking water well treatment unit, prompting recommended further evaluation by the San Joaquin Valley APCD³.

Beginning in November 2018, Greenaction and EI Pueblo para el Aire y Agua Limpia launched the Kettleman City Community Air Monitoring & Air Quality <u>Project</u>, funded through CARB's AB 617 program. They focused on educating residents about pollution-health impacts, training them to file air complaints, and setting up pilot PM monitoring programs to gather localized data. Central to this effort was their Diesel Education & Emissions Reduction Project, which targeted truck idling along major routes like I-5 and SR 41. Through outreach to drivers and businesses, supported by youth leadership and community organizing (including the Youth Environmental Justice Leadership Academy), they successfully lobbied CARB to install "No Diesel Idling" signage in 2018. Follow-up observations, including before-and-after surveys, showed up to a 91% reduction in illegal idling at targeted hotspots.

In 2022 and 2023, Greenaction and El Pueblo expanded these efforts through annual Community Health & Environmental Justice Fairs, combining air monitoring demonstrations with asthma screening, educational resources, and civic engagement activities. Collectively, their initiatives have empowered residents with real-time air data, reduced diesel pollution exposure, and built a strong foundation for long-term community-driven environmental health advocacy.

Finally, in 2025, the UNIDOS Network secured funding to install an EGG Air Quality <u>Monitor</u> at the Kettleman City Market. This monitor primarily aims to measure PM_{2.5} concentrations, but can be supplemented with sensors for CO₂, NO₂, SO₂, O₃, CO, and VOCs. The goals of this installation will be to provide real-time air pollution data to community members, to establish baseline measurements for future comparison, to document pollution spikes for regulatory enforcement, and to generate data for policy advocacy and research.

2.3 Gaps in air quality information that SMMI will address

Kettleman City has long been identified as having some of the worst ambient air quality in the state, but the city's ability to characterize the suite of pollutants the community is exposed to is limited. For example, the nearest regulatory sites reporting PM_{2.5} and O₃ are too far to represent local conditions, and measurements of VOCs, criteria air pollutants such as CO and NO₂, and greenhouse gases such as CH₄ and CO₂ are missing entirely. Moreover, these monitoring stations serve to provide area-wide averages that are useful in establishing broad trends but do not offer intra-neighborhood insights.

Though a number of studies have focused on quantifying the abundance of pesticides and air toxics plaguing Kettleman City, these have largely been temporary in nature, and the community lacks a method for continuously verifying their air quality in real time. Recent initiatives by the UNIDOS Network aim to fill this gap, but only a single sensor is currently planned for deployment. Continuing to elucidate the various drivers of air pollution in the community will necessitate an approach with higher spatial resolution. For example, tracking VOCs block-by-block would allow for the identification of the emission sources specifically relevant in this domain.

³ California Environmental Protection Agency (2010). *Kettleman City Air Quality Assessment*. https://www.mm.com/content/dam/wm/assets/facilities/kettleman-hills-landfill/documents/Trucks--OEHHA%20KC%20AQ%20Assessment%2 Otruck%20count.pdf



Kettleman City is exceedingly small in area, but the surrounding agricultural influence and its position along major regional transportation routes cause it to face notable air quality challenges. Additionally, the whole of the community is designated as an SB 535 disadvantaged community, compounding concerns about health and environmental equity. A summary of the air pollution concerns and sources identified by the community, supported by information about major polluting facilities and air toxics hot spots, include:

- Traffic emissions from major roadways such as Interstate 5 and SR-41
- Agricultural operations contributing pesticides, dust, and biomass burning emissions
- The Kettleman Hills Hazardous Waste Facility
- The abandoned Chevron oil fields

To provide the type of data necessary to characterize the areas of concern identified by the community and prioritize locations for further plans and community action, the following data gaps were identified:

- Lack of localized, community-scale air monitoring data that can detect variability block-by-block or near specific sources
- Lack of information on air pollution both near sources and near sensitive receptor locations
- Lack of greenhouse gas measurements
- Insufficient speciated data on air toxics, including VOCs and BC PM

This plan proposes to use mobile air pollution monitoring to provide highly spatially resolved pollutant concentration data for the community. The detailed spatial information from mobile monitoring can help identify specific, localized sources of pollution and show how pollutant levels change across and between different neighborhoods. The Aclima Mobile Platform includes an expanded suite of pollutants that support improved characterization of sources including the use of black carbon to diesel particulate matter and TVOCs to indicate areas where toxic air contaminants may be located. Furthermore, the use of the expanded suite of equipment in the Partner Mobile Laboratories enables communities to be monitored for specific toxic air contaminants. The information gathered through mobile monitoring supports the development of pollution reduction plans that can be different for various parts of a community, allowing for solutions that are specifically suited to local needs.

3. Scope of actions

Data gathered by mobile air monitoring can support a wide range of actions by communities and governments to reduce emissions and/or exposure. Examples of possible actions include, but are not limited to:

- Regulatory investigation: where these data identify locations of persistently elevated concentrations, local and state agencies may decide to do further investigative work that can lead to compliance and enforcement actions (e.g. fines, new emissions control requirements)
- Traffic management strategies: by identifying locations of persistently elevated concentrations caused by vehicular emissions, these data can inform local and state vehicular emissions control strategies, including initiatives like anti-idling enforcements or vehicle emissions inspection programs
- Urban planning: governments can use an understanding of how air quality varies over time and space to direct investment in green spaces or update zoning regulations to restrict certain land uses
- Corporate action: individual companies may be able to use these data to adjust their transportation routes and schedules, or facility operations, to reduce emissions and health impacts
- Modeling and forecasting: mobile air monitoring data can support improved modeling of historical air quality that allows better prediction of future patterns and impacts across a community



- Health risk assessments: where these data identify disproportionate impacts of pollution across the geography of a community, these insights can be used in conjunction with other datasets to assess potential health impacts for communities or identify locations where formal health risk assessments should be performed
- Community action: data provided by mobile air monitoring may be useful to community-based organizations in advocacy work to reduce emissions and/or exposure, including the development of Local Community Emissions Reduction Plans (LCERPs)

When monitoring has concluded, CARB, Air Districts, community groups, regulatory agencies, researchers, and other parties are encouraged to leverage the data to address specific air pollution concerns.

4. Air monitoring objectives

4.1 Define objectives

The air monitoring aims described in Section 2 can be expanded into two primary air monitoring objectives:

1. Identification and characterization of air pollutant emission sources

This objective seeks to better understand and characterize the air within the vicinity of known, suspected, or unknown sources, which can include the following goals:

- Understand what locations in communities are impacted by pollution near sources
- Understand how concentrations can vary directly downwind of a given source
- Understand how concentrations near a given source may vary by time of day

2. Identification of disproportionate air pollution impacts

Mobile air monitoring can also be used to investigate various objectives focused on understanding the unequal distribution of air pollution within a community:

- Identify the key pollutants that impact ambient air in a community
- Understand the typical concentrations of pollutants in ambient air in the community
- Understand how pollution is distributed across a community
- Understand how pollution varies in time across a community

These two objectives support investigation of the majority of concerns identified by the community by either characterizing both individual sources, such as hazardous waste facilities, and broader source types, such as mobile sources associated with freeways or local truck traffic, as well as the impact of these sources across the community.

4.2 Define mobile monitoring methods to support objectives

Given the gaps identified in Section 2.3 and the community specific air quality concerns, the types of data needed include high spatial resolution data in a wide variety of locations across the community of Kettleman City, in particular for black carbon, VOCs, heavy metals in PM_{2.5}, air toxics including benzene, toluene, and arsenic, and other organic air toxics associated with landfills, pesticides, and other local sources The mobile monitoring approach enables the collection of data at high spatial resolution throughout the community over the entire mapping period. This approach results in measurements of a snapshot of the concentration of air pollutants near to many if not most



of the areas of concern identified by the community during the project. The data resulting from mobile monitoring support targeting a wide range of source types within the monitoring area, allowing for flexibility of source analysis without predetermined source selection.

The CAMP will use two mobile monitoring approaches to support project air monitoring objectives - broad area monitoring and targeted area monitoring. Broad area monitoring supports the air monitoring objectives throughout the entire CAMP monitoring areas over the entire monitoring time period while targeted area monitoring will focus on a subset of specific air pollution concerns with focused driving around those concerns for shorter periods of time.

Broad area monitoring: monitoring vehicles collect data within the entire CAMP monitoring area over an extended time period using the Aclima Mobile Platform. Vehicles monitor on publicly accessible roads, gathering repeat measurements at different times of day, days of the week, and seasons. Broad area monitoring tells us about the typical concentrations of pollutants and locations of persistently high pollutant concentrations throughout the CAMP area over the whole period of monitoring. As an example, Figure 4.1 shows results of a broad area monitoring approach in San Francisco, displaying typical NO2 concentrations observed over a 1 year time period. Broad area monitoring will occur over a 9 month time period between June 2025 and March 2026.

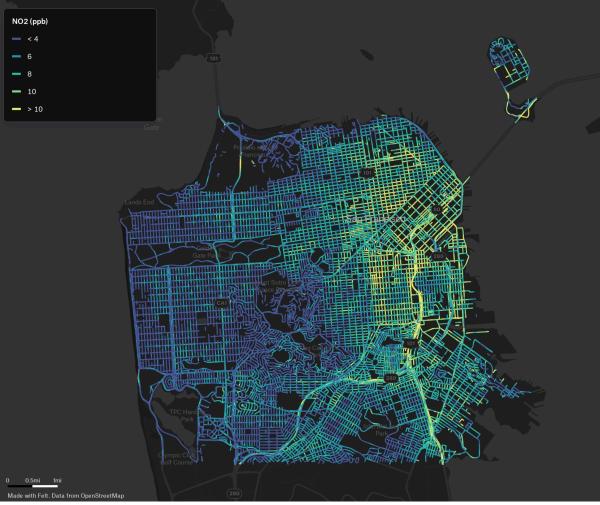


Figure 4.1: Example of plotted ambient concentration estimates for NO₂ in the San Francisco Bay Area, CA, showing typical concentrations observed over a 1 year monitoring period. This example shows how high NO₂ concentrations

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(as illustrated by the brighter green colors) are disproportionately impacting the eastern parts of the city. This plot uses data generated by the broad area monitoring method.

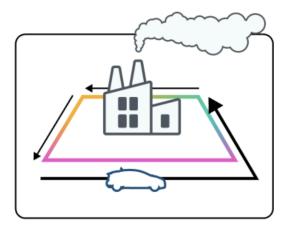
The suite of pollutants measured by the AMP supports the exploration of many source types identified by the community. Black carbon measured in combination with NO₂ and other combustion related pollutants help identify areas impacted by diesel particulate matter pollution. TVOC data help identify areas where organic toxic air contaminants may be located. Methane and ethane data combined with other pollutants help identify locations of elevated biogenic methane, which can indicate emissions from landfills and wastewater treatment plants.

Targeted area monitoring: a subset of monitoring vehicles focuses on specific air pollution concerns (sources or impacted areas) at smaller spatial scales and shorter time periods. This measurement strategy involves monitoring over a relatively small area over a shorter time period with more intensive driving (i.e. more samples in a specific area on any single day). There is an inherent limitation in the targeted area studies in that they will typically occur over a short time period and the results are likely to not be representative over longer time periods (different facility operating patterns and/or meteorological conditions). While broad area monitoring may provide more temporally representative results, targeted area monitoring is a complimentary approach that can tell us more detail about a specific concern, such as the exact makeup of chemicals being emitted from a particular facility, what areas of a community are most impacted in the immediate vicinity of pollution sources, or what times of day these areas are most impacted. Targeted area monitoring vehicles will either be drawn from the broad area monitoring fleet (Aclima Mobile Platforms) or from a special mobile laboratory fleet (a small number of vehicles with higher accuracy/precision sensors detecting a wider range of pollutants including toxic air contaminants), depending on the specific source of concern. In contrast to the broad area monitoring approach, the number of concerns that can be addressed is much more limited, but the depth at which the data about the concerns can be collected and analyzed is potentially greater.

Targeted area monitoring vehicles can be deployed in different ways to meet different objectives.

- Fenceline driving (Figure 4.2) gathers data systematically on predetermined routes around the perimeter of a known or suspected source facility/site. Fenceline driving can help determine the chemical makeup of emissions from a known source.
- Transect driving (Figure 4.2) follows a path designed to go upwind, through, and downwind of a potential plume of pollution from a known or potential source. Transect driving can help us better understand the chemical makeup of emissions in a plume, and where the plume is impacting in the local community.
- Pseudo-stationary driving approximates a more traditional stationary monitoring approach by temporarily stopping a monitoring vehicle within a potential plume of pollution from a known or potential source.
 Pseudo-stationary driving can help us better understand how pollution from a source varies in time. It can also allow for measurements of certain pollutants where measurement methods require longer sampling times (minutes up to an hour).
- General Survey driving is repeated monitoring along a predetermined route or on all roads within a predetermined area, attempting to collect air pollutant data evenly across time.





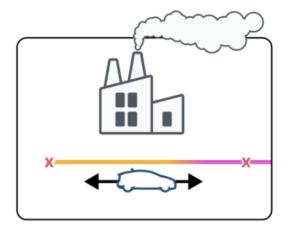


Figure 4.2: Example measurement technique for targeted area monitoring using (left) fenceline driving systematically surveys around the perimeter of a known or suspected source facility/site and (right) transect driving following a path designed to sample upwind, in, and downwind of a potential plume of pollution from a known or potential source.

Targeted area monitoring for Kettleman City will be conducted by Aerodyne, and additional information about the targeted area monitoring can be found in Section 8.3. The suite of pollutants for monitoring by Aerodyne includes heavy metals in particulate matter, methane, and a number of organic air toxics such as benzene and PAHs, that are relevant to the mixture of air pollutants expected from the concerns and sources identified in Section 2. Aerodyne was assigned to this CNC because of its capability to measure heavy metals in particulate matter as well as an extensive list of organic air toxics.

4.3 Community-defined concerns, objectives, and analysis plans

The community engagement process has defined a range of air pollution concerns. These concerns were translated into specific high-level monitoring objectives and sub-objectives, which in turn allowed the selection of appropriate mobile monitoring methods and data analysis plans to collect the type of data needed to address gaps in prior monitoring efforts and to address specific community concerns. Not all concerns and identified pollution sources are assigned specific monitoring objectives. In some cases it is because the measurement methods for monitoring the sources are not available to address the specific pollution sources. More generally, however, it is because resources for targeted area monitoring are limited across the entire SMMI project (62 different communities) and not all concerns can be directly addressed through the targeted area monitoring approach.

While the concerns listed below will be the primary focus of the monitoring in Kettleman City, the final collected data set can be further analyzed beyond the scope of SMMI to address a much wider set of concerns and sources. The monitoring objectives are defined for a grouping of different sources here because it is difficult to pre-determine which ones should be the focus due to changing conditions and strong seasonal and episodic events. The approach is generalized, as discussed in Section 8.3, in order to flexibly adapt to conditions during the monitoring and to collect data in a way that may provide information on a variety of different sources impacting background air in the community.

Note that the selection of specific concerns to be included as monitoring objectives for targeted area studies does not imply that these are the most impactful sources or the most impacted areas in the community. The results of



these studies will not be able to provide a comprehensive view into all possible sources in the community and the monitoring objectives listed here should not be interpreted that way.

The table below provides an outline of the community specific concerns, objectives/sub-objectives, mobile monitoring methods, and data analysis approaches that may support actions to reduce emissions or exposure in a community. More details on the monitoring methods and presentation approaches can be found in Section 8 and Section 13, respectively.

Table 4.1: Community-defined concerns, objectives, and analysis plans

Community Concern	Primary Monitoring Objective	Monitoring Sub-objective	Mobile Monitoring Methods	Analysis Approach
Multiple sources including the hazardous waste landfill, pesticide treated orchards, and venting of benzene and arsenic from water treatment operations.	Characterizing Sources	Which source types most responsible, Pollutant levels, Key pollutants	Targeted area: General survey Conducted by Aerodyne	Clusters of enhancement detections on a map Statistics on detections Chemical speciation bar/pie graph

5. Project roles and responsibilities

The SMMI defines the roles and responsibilities of various stakeholders in the community monitoring. The Community Engagement Plan details these roles and responsibilities and outlines how different groups will work together for community engagement. This section outlines the organizational structure for the SMMI partners (Figure 5.1), a list of community organizations that are Engagement Leads, and a list of the PEG members (Figure 5.2). Information on the SMMI project, including links to Engagement Leads, PEG members, and PEG meetings is also available at https://aclima.earth/ca-smmi. Responsibilities for Engagement Leads and PEG members are laid out in Section 1.1 in detail.

CARB's Monitoring and Laboratory Division is responsible for funding, managing and overseeing the project and ensuring it meets all contractual requirements. Aclima is the primary contractor for the project and is responsible for designing and implementing a plan for statewide community engagement, developing CAMPs for all project area communities, deploying mobile platforms to collect data, managing and analyzing data, and developing public reports. CARB and Aclima meet weekly to discuss project updates and ensure the project is progressing.

Based on the project's Community Engagement Plan, UNIDOS Network, the Engagement Lead for Kettleman City, plans and implements community outreach and engagement for the project, with the goal of understanding specific community concerns around air pollution. In addition to the distribution of an air pollution survey, UNIDOS Network

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holds and conducts outreach for two community meetings focused on local air pollution concerns that are tailored to the specific linguistic, cultural, and accessibility needs of the community. UNIDOS Network then summarizes community air pollution concerns for Aclima to translate into the CAMP. Community members play a crucial role in providing their knowledge and experiences with air pollution both through participating in the community meetings and through completing the air pollution concerns survey. The Project Expert Group guides community engagement and decision-making throughout the project, meeting eight times over the project period in meetings facilitated by Aclima.





Figure 5.1: SMMI Project Organizational Chart



Community Organizations

Engagement Leads lead and co-manage community engagement efforts in the designated communities

- Acterra
- Breathe SoCal
- · Californians for Pesticide Reform
- Canal Alliance
- CCEJN
- Center for Community Action and Environmental Justice (CCAEJ)
- · Center on Race, Poverty, and the Environment
- · Citizen Air Monitoring Network
- · Clean Water Fund
- Climate Action Campaign
- Community Agency for Resources, Advocacy and Services (CARAS)
- Cool OC
- · Day One
- El Concilio
- · Girl Plus Environment
- Greenbelt Alliance
- HARC, Inc.
- · Healthy Fresno Air
- HOPE Collaborative
- Just Cities
- · Leadership Counsel
- Los Amigos de la Comunidad
- Madera Coalition for Community Justice
- One Treasure Island
- Our Children's Earth Foundation (for Rodeo Citizens Association)
- · Pacoima Beautiful
- · Rise South City
- Sacramento EJC
- San Leandro 2050
- SOMCAN
- Sustainable Contra Costa
- · Sustainable Solano
- The Niles Foundation
- Tri-Valley Air Quality Climate Alliance
- UNIDOS Network
- · United for Justice
- Valley Improvement Projects
- Valley Onward
- Valley Vision

Project Expert Group

A cross-sector group of representatives from local air districts, community-based organizations, academia, and residents from overburdened communities that guides community engagement and decision-making for this project.

- Nader Afzalan
- Stephanie L. Mora Garcia
- Brent Bucknum
- Mikela Topey
- Agustin Angel Bernabe
- · Amelia Stonkus
- Anna Lisa Vargas
- Gustavo Aguirre Jr
- · Jamallah Green
- Jonathan Mercado
- Ken Szutu
- · Lillian Garcia
- Moses Huerta
- Ms. Margaret Gordon
- Brad Dawson
- Kate Hoaq
- Lily Wu-Moore
- Payam Pakbin

Figure 5.2: List of Engagement Lead organizations and PEG members for SMMI



How will monitoring be conducted?

6. Data quality objectives

Data quality objectives (Data Quality Objectives) are a series of goals set to make sure that the data collected, the analyses performed, and the visualizations produced are of good enough quality to address the stated monitoring objectives. These goals can be related directly to the quality of the measurement method, for example the accuracy or the precision of a sensor. They can also be more qualitative goals that determine how the measurement data is analyzed and visualized to accurately address community air quality concerns without being misleading. Data quality indicators are sometimes included as part of a data quality objective and are specific metrics that can be used to tell how good a measurement is. Some commonly used data quality indicators are data completeness, precision, bias, or limit of detection. Additional information on these and other data quality indicators can be found in Appendices C. D. E. F. and G.

Mobile air quality monitoring enables a variety of high-resolution spatial analyses that support different air monitoring objectives. One output uses time-resolved data from multiple individual drives of the same location to identify areas where pollution concentrations vary substantially and persistently from local background levels, indicating a probable local emissions source. This supports the air monitoring objective of attempting to identify and characterize pollution sources. Another output is the creation of maps of typical air pollution concentrations at block-by-block resolution that show areas of persistently high or low levels of individual pollutants, supporting the air monitoring objective of identifying areas of disproportionate impact.

Different monitoring objectives have different data quality objectives. The two primary monitoring objectives for SMMI and their associated data quality objectives are:

1. Identify and characterize air pollutant emission sources

Typical pollutants of interest: CH_4 , C_2H_6 , BC, $PM_{2.5}$, NO, CO, TVOC, heavy metals in $PM_{2.5}$, acrolein, pesticides such as dichloropropene, and a variety of additional organic compounds

Data quality objectives:

- a. Find and map spots where pollution is likely coming from by detecting noticeable spikes in measurement readings that are clearly above normal background levels. More specifically, this means that the spike measurement must have a signal to noise ratio of at least 3.
- b. Ensure high confidence in the locations where pollution emissions sources are detected and minimize the presence of "false positives" in the resulting data. This is done by ensuring that multiple detections of emissions sources occur in the same location before identifying it as a likely source of pollution. This can be quantified as the number of detections per visit to a particular location.
- c. Aclima will monitor and track the performance of each underlying measurement using the following key data quality indicators: gain drift and limit of detection. Additional information is in <u>Appendix C.</u>

2. Identify disproportionate air pollution impacts

Kettleman City Community Air Monitoring Plan

Statewide Mobile Monitoring Initiative



Typical pollutants of interest: O₃, NO₂, PM_{2.5}, BC, heavy metals in PM2.5, organic air toxics such as benzene and PAHs

Data quality objectives:

- a. Produce an ambient concentration estimate of pollution for the monitoring area by collecting measurements at different times of day, day of week, and across seasons to account for natural variability of pollution levels.
- b. Ensure data are spatially distributed throughout the entire user-defined area.
- c. Produce concentration estimates at desired and practical spatial aggregation scales (e.g. hexbins, road segments).
- d. Include a measure of confidence (i.e. a confidence interval) with each ambient pollution concentration estimate, so users can understand the reliability of the values and whether pollution levels are truly different between locations.
- e. Monitor and track the performance of each pollutant measurement using the key data quality indicators of bias, drift, precision

These data quality objectives are largely qualitative goals that provide the foundation for the types of insights that mobile monitoring is designed to support. A critical aspect of quality assurance underlying these objectives is characterizing and maximizing the measurement quality of the air pollution measurements, particularly for the sensors. However, confidence in these data products will depend on a number of additional factors such as mobile monitoring strategy, the number of samples collected for features of interest (i.e. road segment or other spatial length scale), magnitude and variability in pollution concentrations, and meteorology over the contract period. Different sensors in Aclima's Mobile Platform have varying levels of data quality and limitations to consider, which are outlined in Appendix C.

Data completion is an important quantitative data quality indicator in air quality monitoring as incomplete data can lead to biased conclusions from the data collected. Traditionally, data completeness is quantified across the time dimension, for example, number of data points collected per total time elapsed. With mobile monitoring, in some cases it is more important to quantify data completion in the spatial dimension, for example, total number of data points collected in a specific location compared to an expected number of data points in that location. Aclima's completeness metric for monitoring is discussed in Section 12. For the customized targeted area monitoring, metrics for completion are discussed in Section 8.3. Achieving completion for the monitoring plan relies on individual sensors having high temporal data completeness rates and uptime. Completeness rates of 80% or higher generally allow for efficiently achieving the spatial completeness objectives. If completeness is below 80%, additional driving will be done to compensate in order to meet the monitoring completeness metrics. If this is not possible for specific monitoring objectives, the impact will be detailed in the final report.

The comprehensive quality assurance approach incorporates processes and metrics to minimize uncertainty. Achieving data quality objectives relies on more than just individual indicators, as real-world challenges (e.g., driver absences) and external events (e.g., wildfires) can affect data quality despite a robust QA plan. The primary aim of these objectives is to generate high-quality data with well-defined performance parameters, enabling effective aggregation and analysis of mobile data for informed decision-making and pollution reduction initiatives across various applications. Section 12 details the evaluation of the effectiveness in meeting these data quality objectives. Section 12.2 details the QA/QC information that will be included in the final report.



7. Monitoring methods and equipment

Aclima will deploy two distinct but complementary monitoring methods enabled by the use of a mixed fleet of AMPs and PMLs:

- Broad area monitoring collected by AMPs, with mobile monitoring guided by dynamic algorithm in monitoring areas defined by the community as areas of high pollution concern during community meetings and through survey submissions
- Targeted area monitoring for investigations of specific sources and areas of concern, collected by Aerodyne, with mobile monitoring guided by community-defined air quality concerns and monitoring objectives

7.1 Monitoring equipment

Broad area monitoring as part of this CAMP will be conducted using a fleet of Aclima Mobile Platforms (AMPs, Figure 7.1).



Figure 7.1: An Aclima Mobile Platform.

All AMPs have a standardized measurement suite that covers a core range of priority pollutants and greenhouse gases (GHGs) shown in Table 7.1, operating at a collection frequency of every second (with the exception of ozone which is measured every 2 seconds). The Aclima fleet will conduct broad area monitoring measurements during different times of day and different days of the week.



Table 7.1: Air pollution and greenhouse gas species measured by the AMP.

Pollutant	Measurement Frequency
Carbon Monoxide (CO)	1 sec
Carbon Dioxide (CO2)	1 sec
Nitric Oxide (NO)	1 sec
Nitrogen Dioxide (NO2)	1 sec
Ozone (O3)	2 sec
Methane (CH4)	1 sec
Ethane (C2H6)	1 sec
Total Volatile Organic Compounds (TVOC)	1 sec
Fine Particulate Matter	1 sec
Black Carbon	1 sec

Experienced scientists from academia and industry will be deploying 3 Partner Mobile Laboratories (PML) that are equipped with instruments that measure a wide set of speciated air toxics. The PMLs are research groups from UC Berkeley, Aerodyne Research, and a consortium including researchers from UC Riverside, Baylor University, and University of Houston. Each vehicle is custom-built with different specifications and instrumentation. All 3 vehicles sample in real time with sample time ranging from 1 second up to 30 minutes, depending on the instrument. A full list of PML instrumentation and pollutants measured is available in Appendix I.

For Kettleman City the Aerodyne Mobile Laboratory (AML) will be conducting the targeted area monitoring. The AML is a large box truck. It is equipped with a suite of instruments to measure trace gases, volatile organic hydrocarbons and hazardous air pollutants, speciated particulate matter and particulate matter metals. Four Aerodyne Tunable Infrared Direct Absorption Spectrometers will measure methane and ethane (TILDAS-CS-C2H6), formaldehyde (TILDAS-CS-HCHO), carbon monoxide, nitrous oxide and water (TILDAS-CS-N2O) and ethylene oxide (TILDAS-FD-EtO). An Aerodyne Vocus proton transfer reactor time of flight mass spectrometer (Vocus PTR-TOF) will measure benzene, toluene, the sum of ethylbenzene and xylenes, acrolein, and select additional compounds including sulfur compounds and carbonyls. The Aerodyne Thermal Desorption Gas Chromatograph Electron Ionization Time of Flight Mass Spectrometer (GC-EI-TOF) will measure isomer-speciated C6-C9 aromatics, C3-C12 alkanes, along with a variety of hydrocarbons, halogenated compounds, and oxygenates, including 1,3-butadiene, methyl bromide, 1,3-dichloropropene, 1,4-dioxane, and numerous additional Hazardous Air Pollutants and Volatile Chemical Products. An Aerodyne Cavity Attenuated Phase Shift Spectrometer (CAPS-NOx) will measure the oxides of nitrogen (NOx) and nitrogen dioxide. A Licor Non-Dispersive Infrared Carbon Dioxide Analyzer (LI-COR 6262) will measure carbon dioxide. A 2BTech Ozone Monitor (2B Tech Model 205) will measure ozone. An Aerodyne Soot Particle Aerosol Mass Spectrometer (SP-AMS) will measure speciated particulate matter organics, sulfate, nitrate, ammonia, chloride and black carbon, along with select atomic metals, for sizes < 2.5 microns. A condensation particle counter (TSI Model 3775) will measure particulate matter number count < 2.5 microns. A Cooper Xact



monitor (Cooper Xact 625i) will measure elemental particulate matter metals smaller than 2.5 microns, including chromium, arsenic, selenium, bromine, cadmium, antimony, mercury and lead. An Aerodyne small sensor unit (ARISense) equipped with an Alphasense Optical Particle Counter (Alphasense OPC-N3) will measure particulate matter loadings PM1, PM2.5 and PM10. Finally, a combination of onboard anemometers (RMYoung 85004 and Airmar 200WX) and a GPS unit (Hemisphere GPS Compass V103) will provide wind speed, direction, vehicle position, RH and temperature.

7.2 Monitoring methods - broad area monitoring

In broad area monitoring, Aclima's fleet of Mobile Platforms will collect data within the community defined monitoring area boundary. AMPs will measure on publicly accessible roads within this boundary, gathering repeat measurements at different times of day, days of the week, and seasons.

Aclima will conduct monitoring within the defined boundary such that the fleet will complete an average of 20 repeat measurements distributed across all residential and major roads in all census block groups to provide adequate coverage throughout the monitoring area. However, rather than specify the number of samples on any specific length of road within each census block group, Aclima uses a dynamic mobile sampling algorithm that is updated daily with the specific goal of collecting data that will maximize improvement in the characterization of a location's air quality. This approach ensures that sufficient measurements are collected in areas where greater pollutant variability requires additional sampling to achieve representativeness, or measurements that are representative of the conditions across the specific monitoring period. The system uses observed data in combination with predictive models to prioritize data collection in locations based on these factors:

- Number of visits to-date relative to expected visits, given the time elapsed over the 9 month monitoring period
- Time elapsed since the last visit
- Variability in observed pollutant concentrations over repeat visits, i.e. a mismatch between observed concentration and the predicted concentration based on prior observations

At the beginning of the monitoring period, the number of visits is more heavily weighted than the other factors and once a suitable number of observations have been made to make reliable predictions, the variability of observed pollutant concentrations becomes more heavily weighted. In the end, locations where pollutant variability is higher, will be prioritized for more repeat visits in order to more adequately characterize the average pollutant concentrations in these locations.

Aclima ensures continuous mobile monitoring throughout the day by staffing driving shifts throughout the day and staggering start times to avoid operational gaps when drivers are ending and starting shifts. The drive planning algorithm operates across large areas, not individual communities of varying sizes, and aims for spatially diverse data collection daily across all CNCs, regardless of the amount of road miles contained in those communities. To mitigate time-of-day bias, specific road locations are randomly assigned to 6-hour windows on a daily basis to mitigate against overly biased collection in certain locations to certain times of day. The sampling algorithm also prioritizes maintaining an equal revisit rate across the monitoring area, aiming for the 20-visit average over a nine-month period rather than quickly completing specific locations. Locations that receive 20 visits early on in the nine-month period will continue to be visited over time.

The mobile sampling algorithm ensures sufficient data collection to support the calculation of spatially resolved ambient concentration estimates. In addition, the method supports source identification and assessment of



disproportionate impacts by directing more sampling either in regions where there is larger variation in pollution concentrations. For a detailed discussion of the broad area mobile monitoring and the dynamic mobile monitoring algorithm, see Aclima's QA documentation in the <u>Appendices C, D, and E</u>.

The broad area monitoring boundary for Kettleman City is shown in Section 8: Monitoring Areas.

7.3 Monitoring methods - targeted area monitoring

Aerodyne will conduct targeted area monitoring that focuses on specific air pollution concerns at smaller spatial scales. This involves monitoring over a relatively small area over a shorter duration in time (approximately 1 to 2 weeks) and is designed to complement the broad area monitoring coverage by providing more in-depth information about a specific area of concern. This can provide both enhanced characterization of pollution sources as well as an assessment of the locations of concern and sensitive receptors in the community that are impacted by source emissions. Targeted area monitoring is designed to perform detailed chemical, temporal, and/or spatial characterization at a select number of locations of concern identified by communities. The characterization can include aspects such as denser temporal information about pollutants by time of day, detailed chemical speciation around sources of concern in a particular area, or spatial information about the location of an emission source and extent of the areas and people impacted by the source.

The mobile monitoring method for targeted area monitoring is different from that used for broad area monitoring. By the nature of targeted area monitoring, a more customized driving method is necessary to support air monitoring objectives and concerns specific to individual communities. As with the broad area monitoring, representativeness is achieved by conducting repeat measurements to sufficiently characterize pollutant concentrations; however, the repeat measurements will typically (though not exclusively) occur over a more condensed time period in these targeted investigations.

Section 8 (Monitoring Areas) details the targeted area monitoring study that will be conducted in Kettleman City.

7.4 Strengths and limitations of mobile monitoring

Because of the nature of mobile monitoring and how it differs from stationary monitoring, there are inherent strengths and limitations to the approach.

- Mobile monitoring can cover more area at a higher spatial resolution than stationary networks (i.e. fewer spatial gaps in coverage). However, because mobile monitoring vehicles can only spend a limited period of time at a given location, there may be gaps in time for that location where monitoring data is not available.
- Mobile monitoring sensors and instruments can gather valid data on a wide variety of important pollutants for informing community action, but to achieve high spatial resolution, gather data on fewer pollutants and at lower precision and accuracy than is possible in stationary networks. As a result, mobile monitoring sensors are not certified by the U.S. EPA for gathering data that can be compared against national ambient air quality standards (NAAQS) and used in regulatory actions under the Clean Air Act. For certain regulatory actions, a follow-up study using U.S. EPA-approved monitoring methods may be necessary.
- While mobile monitoring can provide a significant amount of information across a given geographic area, monitoring vehicles may be present in that area for a limited period of time. This may mean rare events or seasonal patterns are not captured in the dataset.



8. Monitoring Areas

8.1 Community Mileage Allocation

A requirement for SMMI is that at least 50% of the population in the areas monitored are living in areas designated as Disadvantaged Communities (DAC), as defined by the top 25% of CalEnviroScreen scores under SB535. Across all CNCs designated for monitoring as part of SMMI, the total population is approximately 7.9M people, of which 2.9M people live in DACs (approximately one quarter of the California-wide DAC population). Aclima's monitoring resourcing scales with the length of roads contained within the selected monitoring area; in other words, more vehicles and drivers are required to monitor areas with a higher total length of roads. For all CNCs combined the total contained road length is approximately 18,000 miles⁴. The DAC census tracts combine to about 6700 miles. Aclima determined that allocating resources for SMMI such that approximately 12,000 miles of roads could be covered would allow for covering the DAC communities while also keeping the total % of DAC population at 50% or above, whereas adding additional resources would reduce the percentage of DAC population receiving monitoring resources. The implication of this is that because not all communities will receive monitoring resources to cover the entire community, an equitable process for allocating monitoring resources per community would need to be developed that would ensure that communities with higher proportions of DAC population will receive more monitoring resources. In consultation with the Project Expert Group (PEG), Aclima developed a method for allocating monitoring resources for broad area monitoring across the 62 CNCs that are part of the SMMI. The approach involved 3 steps:

- 1. The total number of available road miles was distributed across air districts according to the proportion of population contained within the CNCs in each of the 5 air districts containing the 62 CNCs (Imperial County, South Coast, San Joaquin Valley, Sacramento Metro, and Bay Area)⁵. This resulted in 100% of the road miles for CNCs in Sacramento, San Joaquin, and Imperial County Air Districts being allocated, because the proportion of these air districts' population is higher than their proportion of the CNC road miles compared to that over all CNCs. For the Bay Area and South Coast CNCs, there were more miles present within the CNCs than there were miles available, and therefore a method was required for allocating the remaining miles among individual CNCs.
- 2. A customized prioritization metric for each census tract across all CNCs was defined to rank CNCs according to various socioeconomic and environmental indicators. This prioritization method was defined in consultation with the PEG. A description of how this prioritization metric was defined is given below.
- 3. Individual census tracts within CNCs were successively selected based on this customized ranking until the total road miles available for monitoring in each air district was exhausted. The road mile length of the census tracts selected is added up for each CNC, and that total is the number of miles available for monitoring for that CNC. The total number of miles assigned to each community by this method is presented in <u>Appendix B</u>.

The prioritization metric was created as an alternative to the <u>CalEnviroScreen</u> (CES4.0) score, addressing concerns raised by the PEG about the relevance of many of the metrics used in CalEnviroScreen as applied to the SMMI. Note

⁴ Only major and residential road types are considered in estimates of monitoring area road miles for resourcing purposes; however, all accessible road types, which includes major, residential and highways/freeways, will be driven. ⁵ The populations used for each Air District in this calculation are: Bay Area - 2838232; Imperial - 15330; Sacramento Metro - 138633; San Joaquin Valley Unified - 687473; South Coast - 4573865.



that because the DAC communities are defined based on CES (under SB535), the PEG's prioritization metric will result in some non-DAC communities being prioritized over DAC communities. The methodology Aclima used, in coordination with the PEG, is outlined below.

- Aclima proposed a customized weighting of individual environmental and socioeconomic indicators relevant to the SMMI monitoring methodologies (including some in CalEnviroScreen plus others). The weighting was determined by a survey of PEG members, who collectively assigned weights to each available indicator.
- Survey Score Normalization: The Max/Min method was used to normalize the survey responses from PEG
 members to a scale of 0 to 1. This ensured that individual respondents' tendencies to give consistently higher
 or lower ratings did not skew the overall results.
- Indicator Weighting and Scoring: The normalized raw survey results were used to create weighting factors for each indicator. These weighting factors are shown in Appendix B. For each census tract, a mileage allocation score is derived by converting each indicator value into a percentile rank across all census tracts contained in the CNCs. This rank is multiplied by its corresponding weight, summing across all indicators, and normalizing to a value between 1-100. The indicators were taken from CES 4.0 and two additional non-CES indicators were added: the density of AB2588 Air Toxics Hot Spots and the density of large permitted sources, both measured as the number of sources per unit road length in census tracts. Some of the sources in the inventory had no emissions reported; these sources were first removed before calculating the density of sources.
- Final Score Calculation: The weighted scores for each indicator were summed for each census tract. This summed result was then normalized to a scale of 1-100 to create a PEG mileage allocation score for every census tract contained within the 62 CNCs. The final indicators and scores are available in Appendix B.

While this approach resulted in census tracts with the highest prioritization scores being prioritized within CNCs for the purposes of mileage allocation, the Community Engagement Plan (Appendix A) outlined a process for the Engagement Leads to work with communities directly to use the road mileage budgeted to select monitoring boundaries according to the priorities indicated by the communities. While this process empowers the local communities to make the decisions about where to direct monitoring, it should be acknowledged that the final monitoring area boundaries may not necessarily include the most disadvantaged communities as defined by established metrics such as CalEnviroScreen or by the PEG-developed metric.

For Kettleman City, the total road length (for residential and major roads only) within the community is 8 miles, and the allocated mileage is 8 miles, as determined through the process above.

8.2 Broad Area Monitoring Coverage

Aclima's vehicles will gather detailed location-based and time-based pollution measurements throughout the community. This will happen over a nine-month period as the vehicles drive on roads that are open to the public. The specific neighborhoods where this mobile monitoring will take place were decided by the community members themselves during meetings led by UNIDOS Network. Broad area monitoring will occur consistently across a 9 month period from June to March, with repeat frequency in all locations (at the census block group level) on average approximately once every 2 weeks.

The maps below identify the region selected by the community for broad area monitoring along with location characteristics about known air pollution sources and community-identified concerns. Meteorological data (wind



speed and direction) will be collected on the mobile platform and will be an additional location based characteristic for incorporating into analysis and interpretation of data.

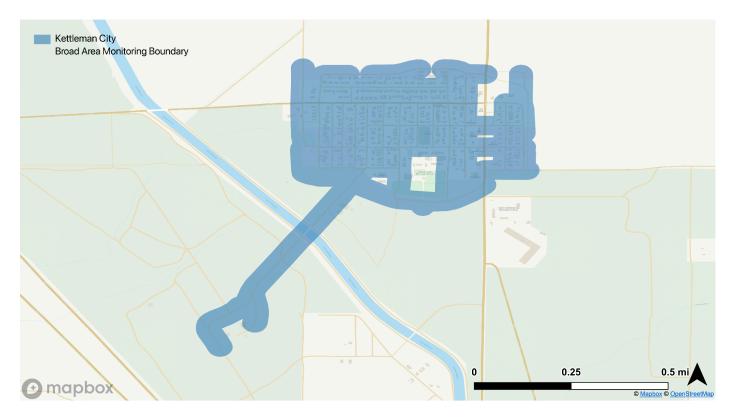


Figure 8.1: Map of the broad area monitoring boundary selected by Kettleman City community members



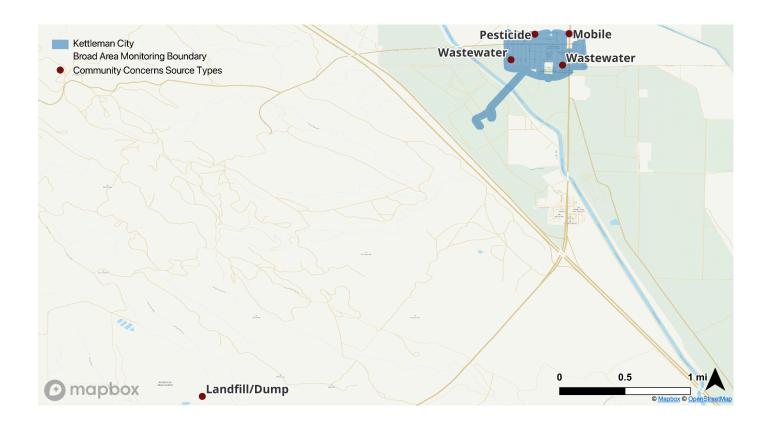


Figure 8.2: Map of the Kettleman City broad area monitoring boundary and local air quality community concerns. Concerns noted by Kettleman City community members include traffic emissions from roadways, pesticide application, and a Waste Management landfill.



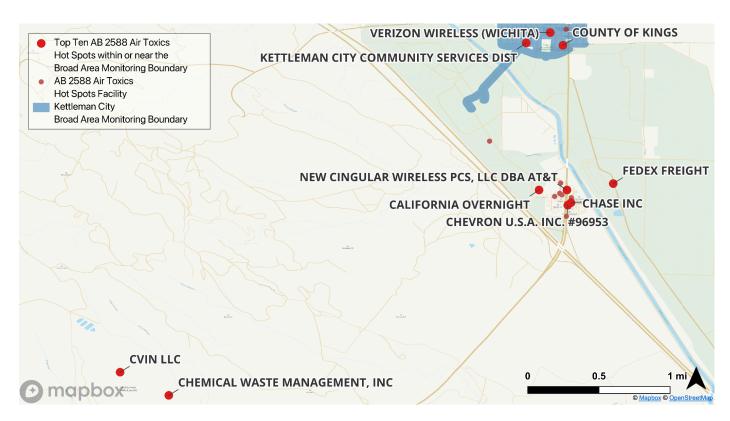


Figure 8.3: Map of AB 2588 Hot Spots within and near the Kettleman City broad area monitoring boundary. The top 10 hot spots, based on total toxicity-weighted emissions (TWE), are emphasized. These sources include the Kettleman City Community Services District, Kings County Fire Department, a Chevron gas station, and a county government office.

8.3 Targeted Area Monitoring

Targeted area monitoring studies are designed to flexibly address specific air quality concerns raised by communities. The monitoring method, data analysis approach, and visualization approach will be customized to collect, visualize, and interpret the data in a way that is most effective for providing results that can ultimately be used to take action to address the air pollution concern. Aclima and the PMLs, with guidance from the PEG, have developed a method that draws from a modular set of predetermined monitoring, analysis, and visualization approaches that can be combined in unique ways to address a number of different concern types and monitoring objectives.

The air quality survey, community meetings conducted by ELs, and other outreach conducted with community members and air district representatives identified and prioritized the community air quality concerns (detailed in Section 2.3).

From the concern and monitoring objectives, a monitoring, analysis, and visualization approach is selected that is most appropriate for providing actionable results to help address the community air quality concerns.

The targeted area study for Kettleman City will be conducted by Aerodyne Research and will address the community identified concern about multiple sources including a hazardous waste landfill, pesticide treated orchards, and



venting of benzene and arsenic from water treatment operations. The primary monitoring objective for this targeted area study is characterization of multiple sources that includes waste management facility, neighborhood of pesticide treated orchards, water treatment venting, and vehicular exhaust. Some of the key pollutants that will be of focus include metals, TVOC, Methane/Ethane, air toxics, odorous VOCs, black carbon, PM_{2.5}, metals, benzene, CO, and NO₂. This targeted area study will be conducted using the following monitoring approach.

- **General Survey** Repeated monitoring along a predetermined route or on all roads within a predetermined area, attempting to collect air pollutant data evenly across time.
- **Fenceline driving** Gathers data systematically on predetermined routes around the perimeter of a known or suspected source facility/site.

Aerodyne will be located near the communities of Kettleman City for a total of 12 days, including mandated down-days and calibration days. The table below provides a list of the priority Kettleman City sources for which data visualizations will be made. Aerodyne will consult a prioritized list of sources which consists of 1) community concerns and 2) additional industrial facilities from regulatory databases. Traffic concerns and other diesel particulate matter concerns that are well handled by the Aclima labs during broad area monitoring are deprioritized by Aerodyne; conversely, new or unknown locations of persistently elevated concentrations flagged by Aclima as requiring additional characterization will be added to Aerodyne's list (e.g. which specific compounds are in a plume of VOCs).

Table 8.1: Top Priority Sources.

Top Priority Sources	Latitude	Longitude
Wastewater treatment vents on Becky Pease St and on General Petroleum	36.00738427	-119.9603042
Ave.	36.00812247	-119.9673285
Orchards at the northern end of Kettleman City	36.01159737	-119.9640786
Chemical Waste Management Site ^a (located ~6 km outside of the CNC)	35.96229078	-120.009425

a) This site is located about 6 km outside Kettleman City, but is suspected that emissions from the site impacts residents. Measurements close to the site as well as background measurements within the community will be made to identify possible pollutant impacts.

Aerodyne is able to visit about two point sources per day, including repeats to top-priority sources. Daily wind conditions and downwind road access will dictate which day(s) a source or concern is visited. Clusters of sources with favorable sampling conditions can often be visited together, maximizing our sampling time. Repeat visits (multiple days) to the top priority sources will be attempted. We will attempt independent visits to high priority point sources on at least 50% of the days allocated to a given CNC, and each visit will attempt to collect 3-5 mobile plumes. If the source is a VOC or dust/metals source, a stationary measurement in the plume enhancement will be attempted.

Sources with no detected emissions are difficult to rule out. Aerodyne will attempt to re-measure non-detect high-priority sources up to two additional times. Repeats to lower-priority non-detect sources will be deprioritized. In addition to site-specific monitoring plans, general background measurements will be made at different points throughout the community using a general survey approach.

The map below shows the focus area for this targeted area study.



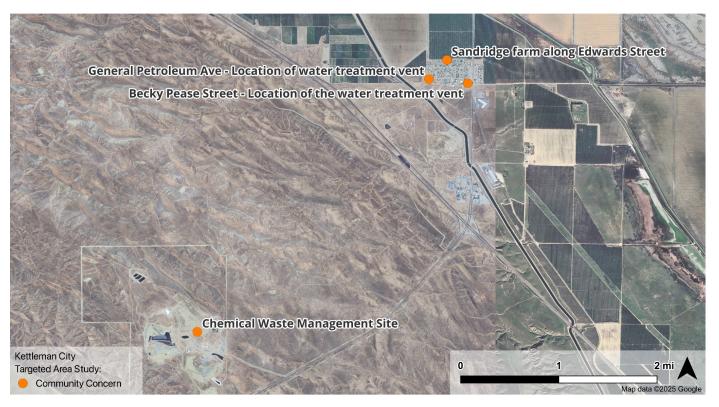


Figure 8.4: Map showing approximate area for the targeted area study. Concerns submitted by Kettleman City community members include a nearby farm, water treatment vents, and a hazardous waste facility to the southwest. Actual drive plan and extent of monitoring is to be determined. See text for description of the monitoring approach.

9. Quality control procedures

Quality control procedures are an important part of all air monitoring plans because they outline the work that will be done before, during, and after the measurement period to make sure that the data collected meet Aclima's data quality objectives.

9.1 Aclima's Quality Assurance and Quality Control Procedures

Aclima has a comprehensive set of quality control (QC) procedures in place throughout the entire monitoring process, from the moment the sensors are installed into vehicles up until the final data is analyzed. These procedures help us track and minimize uncertainty, ensuring that the data collected is appropriate for the intended monitoring objectives. The following is a brief overview of these procedures. A full description of these procedures is included as accompanying documents in Appendices C, D, and E, including the frequency of QC checks conducted.

Calibration is a critical part of Aclima's quality control process. Aclima compares its sensors against trusted reference instruments and standards to make sure they are reporting the correct pollutant levels. Aclima does this at several stages:



- **Before Deployment (Pre-deployment Calibration):** Before mobile monitoring vehicles start collecting data in the community, each sensor undergoes a thorough calibration process.
- During and After Deployment (Calibration Check): During and after a mobile monitoring period, the
 sensors are brought back to Aclima's calibration facilities and recalibrated using the same methods as before
 deployment. This helps the team see if the sensors have drifted or changed their readings during the
 monitoring period. Calibration checks will occur approximately once every 6-8 weeks over the 9 month
 monitoring period.
- Addressing Calibration Drift: If Aclima finds that a sensor's calibration has shifted between any two calibration events, the team carefully reviews the data and may apply adjustments to ensure the accuracy of the measurements taken during the monitoring period. The way Aclima corrects for drift depends on the pollutant and the type of data product (e.g., long-term averages vs. short-term spikes).

Ongoing Checks During Monitoring:

There are several ongoing checks that occur while mobile monitoring vehicles are in the field:

- Driver Checks: Aclima's trained drivers perform daily visual inspections of the monitoring system, including
 checking sample lines and performing PM zero checks to ensure the system is operating correctly. They also
 monitor data connectivity and clean the black carbon sensor inlet.
- Automated System Checks: Aclima's mobile platform continuously monitors various system status
 indicators, such as temperature, pressure, humidity, and flow rates within the sensors. If these indicators fall
 outside of acceptable ranges, the data is automatically flagged for review. This helps us identify potential
 issues early on.
- Manual Data Review: Aclima's technical staff remotely monitor the incoming data and system diagnostics on a weekly basis to look for trends, unusual patterns, or potential sensor issues that automated checks might miss. Aclima may compare its data to that from nearby regulatory air monitoring stations to provide context for how pollutants are generally behaving over time in the region.

Addressing and Correcting Issues:

If any issues are detected during quality control checks, Aclima has the following procedures in place to address them:

- Troubleshooting and Repairs: For minor issues, drivers may be able to perform simple repairs in the field. For more complex problems, sensors or even the entire Aclima Mobile Node (AMN) may be returned to the calibration facilities for repair, recalibration, or replacement.
- Data Flagging and Exclusion: If Aclima identifies data that is likely inaccurate due to a sensor malfunction or
 other issue, Aclima flags this data in the system. Severely compromised data is excluded from further
 analysis to prevent it from affecting the final data products. Data that may have slightly higher uncertainty is
 noted and may be handled with more caution. Both the severity and the reason for flagging will be indicated
- **Data Adjustments:** If a calibration check reveals a consistent drift in a sensor's readings since the previous calibration, Aclima may apply adjustments to the data collected during the deployment to improve its accuracy over that time period. All data modifications are carefully tracked in Aclima's database. During



calibration checks, the sensors also undergo recalibrations to derive the next set of calibration parameters for the next phase of data collection.

Table 9.1: Summary of Aclima QC Procedures and Frequency

Quality Control Activity	Frequency
Driver system checks (PM zeros, data connectivity, tubing and cable checks)	Daily
Manual data review	Weekly
Calibration checks (and subsequent recalibration)	Every 6-8 weeks
Routine Maintenance (internal filter or other consumables swaps, leak checks)	Every 6-8 weeks at calibration checks
Installation and Uninstall Checks (Flow checks, sample line cleaning, sample line filter swaps, etc)	Every 6-8 weeks at calibration checks
On-demand maintenance	As needed

Collocation of Aclima AMN at Regulatory Sites

Aclima AMNs will be installed at 2 regulatory monitoring sites operated by CARB or local air districts across California for long term intercomparisons in order to directly compare Aclima's measurements to regulatory measurements in different regions of the state. There are two motivations for this inter-comparison:

- 1. Provide transparency about how Aclima's measurements compare to FEM/FRM measurements of the key criteria pollutants (NO2, O3, CO, and PM2.5).
- Identify any region-specific biases in the comparison of the AMN PM2.5 measurement with FEM methods.
 Aclima will consult with CARB to determine whether any systematic adjustment to Aclima's PM2.5 data
 should be performed based on the results of this intercomparison (see Appendices C and D for more details
 on the treatment of systematic bias).

These intercomparisons will be evaluated and quantified using various Data Quality Indicators (DQIs) (e.g. bias, precision, mean bias error, R2, etc). As of the publication of this CAMP, an AMN has been installed at a regulatory site in Sacramento (Downtown Sacramento – T Street, 1309 T Street, Sacramento, CA) and in Fresno (Fresno – Garland, 3727 N. 1st Street, Ste. 104, Fresno, CA). These sites were selected based on availability of space as well as the desire to collect AMN data in the Central Valley for characterizing regional differences in PM2.5. This data will be included in the data set released to the public at the conclusion of SMMI and the results of the intercomparison will be summarized in the final report.

Documentation and Oversight

Aclima maintains detailed records of all quality control activities. This includes calibration records, maintenance logs, data review notes, and any data adjustments made. The Quality Assurance Manager is responsible for overseeing



Aclima's quality assurance system, ensuring that company procedures are followed and that Aclima's data meets high quality standards. Results from calibration records will be summarized in the project final report.

9.2 Partner Mobile Laboratories Quality Assurance and Quality Control Procedures

The Quality Assurance (QA) procedures for the Aerodyne Mobile Laboratory involve instrument-specific checks, calibration, and data flagging to ensure data integrity. Each instrument, such as the GC-EI-ToF, Vocus PTR-ToF, SP-AMS, and various trace gas sensors, has a designated Instrument PI responsible for its QA. QA activities include in-field instrument health monitoring (e.g., pressure, temperature, flow stability, detector strength), routine maintenance (e.g., replacing sample tubes, adding oxidant trap aliquots), and comprehensive calibration procedures. These calibrations can be single-point or multi-point curves, performed daily, every few hours, weekly, or pre/post-campaign depending on the instrument. Table 9.2 shows the QA activities and their frequency. Additionally data is subjected to post-analysis QA, which involves filtering out data acquired during zero and calibration periods, identifying and masking data below detection limits, and applying AQS flag data for specific quality issues (e.g., operational deviations, field issues, outliers). GPS and meteorological parameters also undergo QA, including comparing replicate measurements and correcting for vehicle motion. The overall QA framework emphasizes systematic checks, regular calibrations, and transparent data flagging to maintain high data quality throughout the monitoring campaign.

A full description of these procedures are included in an accompanying document in Appendix G.

Table 9.2: Summary of Aerodyne QA Procedures and Frequency

Instrument	Calibration Schedule
Aerodyne Tunable Infrared Direct Absorption Spectrometers (TILDAS) TILDAS-CS-C ₂ H ₆	Automated backgrounds and zeroes performed every 15 minutes. Manual calibrations performed on designated calibration days, at least 3 times during the 6.8 week campaign.
TILDAS-CS N ₂ O/CO/H ₂ O	Automated backgrounds and zeroes performed every 15 minutes. Manual calibrations performed on designated calibration days, at least 3 times during the 6.8 week campaign.
TILDAS-CS-HCHO	Automated backgrounds and zeroes performed every 15 minutes. Calibration planned once at end of campaign using collaborator tank.
TILDAS-FD-EtO	Automated backgrounds and zeroes performed every 2 minutes when far from a source; every 15 minutes when performing fenceline measurements of a source. Manual calibrations performed on designated calibration days, at least 3 times during the 6.8 week campaign.
CAPS-NO ₂ and CAPS-NOx Cavity Attenuated Phase Shift Spectrometers	Automated zeroes every hour. Calibrations performed once prior to the campaign and once after.
LI-COR 6262 CO ₂	Automated zeroes performed every 15 minutes. Manual calibrations
Non-Dispersive Infrared Carbon Dioxide Analyzer	performed on designated calibration days, at least 3 times during the 6.8 week campaign.
2BTech Ozone Monitor	Automated backgrounds and zeroes performed every 15 minutes. Calibration performed once prior to the campaign.



Vocus 2R Proton Transfer Reaction Time of Flight Mass Spectrometer (Vocus PTR-ToF)	During campaign: automated zeroes performed every 90 minutes. Automated single point calibrations performed every 3 hours with leading and trailing instrument zeros.
	Pre- and post- campaign 3 point calibration curve with leading and trailing instrument zeros.
Aerodyne Thermal Desorption Gas Chromatograph Electron	During campaign: Daily, duplicate, single point calibrations with leading and trailing instrument zeros.
Ionization Time of Flight Mass Spectrometer (GC-EI-ToF)	Pre-, mid-, post- campaign: 5-point calibration curve with triplicate data with leading and trailing instrument zeros.
Aerodyne Soot Particle Aerosol Mass Spectrometer (SP-AMS)	Manual calibrations performed on designated calibration days, at least 3 times during the 6.8 week campaign.
TSI Condensation Particle Counter (CPC)	Instrument periodically factory certified.
Cooper Xact 625i	Instrument factory certified prior to campaign.
ARISense small sensor unit with Alphasense Optical Particle Counter	Instrument periodically factory certified.
RMYoung or Airmar Anemometers, GPS compass	No calibration. Duplicate continuous wind measurements used to verify wind direction and magnitude measurement.

An Aclima AMN will be installed in the PML for intercomparisons of PML measurements with Aclima measurements. Additionally inter-comparison exercises are planned between different PML teams participating in SMMI, which are expected to include cross-comparisons of reference gases and parked collocations.

10. Data management

The section briefly outlines how Aclima's system manages data from Aclima Mobile Nodes (AMNs) and Partner Mobile Laboratories (PMLs) throughout the SMMI campaign, fulfilling specific Scope of Work elements related to data management procedures and transfer mechanisms. A detailed description of Data Management can be found in Appendix F.

10.1 Data categories and levels

Data collected as part of this CAMP will range from 1-second measurements used for analysis, combinations or summaries of data collected throughout the observation period, and more rapid notifications of the detection of high concentrations. Aclima organizes these data further into levels reflecting the degree of processing, from the lowest level (Level 0, or L0) at sensor readout to high level (Level 4, or L4) modeled analyses which synthesize individual data points into actionable insights and data summaries for dissemination through visualization and reporting.



Table 9.3: Aclima's Data Processing Levels. Asterisks (*) indicate data levels provided to CARB or in support of non-scientific communication and community visualization.

Data Level	Name	Definition	Example
0	Raw Signal	Original signal produced by the sensor.	Voltage, digital number, raw mass spectra data
1	Intermediate geophysical quantities	Derived from Level 0 data using basic physical principles or calibration equations.	Concentration in ppb or ug/m3
2a*	Standard geophysical quantities	Estimate using sensor plus associated physical measurements directly related to measurement principle.	NO2 derived from O3 and Ox (O3+NO2) Temperature and humidity correction to sensor estimates. Methane and speciated air toxics peaks derived from time series data.
2b	Standard geophysical quantities, extended	Level 2a but using external data sources for artifact correction & directly related to measurement principle.	Not planned for use in the SMMI effort.
3*	Advanced geophysical quantities	Aggregated geospatial products using standard statistical methods.	Basic average concentration maps. Maps of enhancement events.
4*	Spatially continuous geophysical quantities, modeled spatio-temporal phenomenology	Aggregated geospatial products using advanced statistical models and potentially external data	Statistically reconstructed concentration maps with confidence intervals. Locations of persistently elevated concentrations maps

10.2 Data management pipeline

The Data Management Pipeline includes five stages that manage data from collection to analysis. First, 1-Hz sensor data and accompanying metadata are **published** to remote (cloud) systems. Next, the sensor data and metadata are **ingested** into Aclima cloud storage. This Level 0 data is archived to ensure it is never altered. PML data is processed separately but in compatible formats. The raw, Level 0 data is **transformed** into calibrated physical quantities (Level 1) and further refined standard measurements (Level 2a), applying necessary corrections, time-shifting adjustments for sensor lag, and performing both automated and manual data quality flagging. Next, the **models** are used to aggregate L1/L2a information into higher-level geospatial data products (Level 3 using standard statistical methods



and Level 4 employing advanced modeling techniques) to identify emission sources and disproportionately affected areas. Lastly, the data in all levels are labeled and **stored** using scalable cloud data storage. The original collected data is always preserved and snapshots are taken at critical states. CARB will have access for a three month period post-contract.

10.3 Data review and quality assurance

The data management system incorporates support for data review checks, defined as the manual or automated flagging of automated signals from sensor time series. Scientific details of data review can be found in the <u>Appendices C. D. E. and F. Different data review and QA activities take place at different stages.</u>

During the active deployment of a monitoring device and as data is streaming to the cloud, the monitoring team periodically checks (through a combination of manual and automated processes) the data being ingested to flag any sensor or data quality issues as they arise. Wherever possible, issues are resolved quickly in the field. Data that must be omitted from use for any reason (e.g. leaks, sensor failure, flow blockage, etc) is flagged.

After the deployment of a monitoring device is over (once the device returns to its home base), the monitoring team conducts a full review of all sensor data collected during that device's deployment, to ensure any issues that may have slipped through the cracks during the deployment period are detected before data is finally verified. Once again, any well-characterized data issues are flagged and any omissions from use are marked.

Once the deployment of all monitoring devices in the fleet is over (once all devices return to home base and the monitoring period is over), all collected data is re-processed to take account of flags and omissions and to prepare data for handing over to CARB and the community.

The original data coming from the sensors is always preserved, as well as all annotations from the various review and QA steps, so that the inclusion or omission of specific data can be properly traced.

10.4 Data transfer

Finalized L2a data from Aclima and the PMLs will be transferred to CARB via secure cloud storage, following a defined schema compatible with EPA's AQS where applicable. The delivery cadence of finalized data to CARB will be monthly beginning 4 months after data collection. File formatting and other details are specified in <u>Appendix F</u>.

10.5 Data visualization

Data will be used to create datasets and visualizations (e.g., Esri StoryMaps) focused on identifying pollution sources and areas of disproportionate impact, with templates and specific data layers described. Aclima will develop these but CARB will own and host the final StoryMaps.

11. Work plan for conducting field measurements

The plan must describe field procedures that will be followed by those conducting measurements and provide the timeline for community air monitoring. Field procedures spell out individual tasks with enough detail so that air district staff or community members with the necessary training can complete the tasks. Examples of specific field



procedures include documenting actions in logbooks, completing chain of custody forms, and conducting specific quality control procedures. The timeline needs to establish the duration of field measurements and denote milestones for completing key tasks. The plan will also describe communication and coordination steps to ensure field personnel know whom to contact for questions and how work products are delivered. Relevant safety considerations should also be documented.

The work plan for field measurements is distinguished by the monitoring approach.

11.1 Broad area monitoring

11.1.1 Field materials and procedures

Broad area monitoring principally involves the Aclima fleet (Aclima Mobile Platforms, or AMPs). Each vehicle is operated by an Aclima driver, who begins their shift at a local hub powering up instruments, a safety check, and troubleshooting. Their driving day is managed by a mobile application in their vehicle and includes mandated breaks. The day ends back at the local hub and with an instrument shutdown routine. During the day, each AMP is active on a route, constantly collecting data at 1 second intervals.

11.1.2 Communication and coordination

The operations team uses a range of software applications for communication, fleet management, safety, and navigation:

- Information for each operator starting their shift is communicated via a messaging application.
- Each operator can access online resources (written and video instructions) that describe specific standard operating procedures and provide resources for a range of encountered situations.
- Any photos or notes that the operator takes during the day are captured via a dedicated fleet management application.
- A sensor/instrument interface gives basic information to the operator on data reporting status.
- A dashboard mapping application loads the monitoring plan for the day and provides guidance on the route the operator must follow
- For general communication, a dispatch phone line is maintained.
- Operators can also file tickets for issues that cannot be immediately resolved.
- Safety training and issues are handled via a dedicated platform.

11.1.3 Timeline: duration, frequency, milestones, and deadlines

Broad area monitoring will be conducted by Aclima mobile platforms (AMPs) from June 2025 through the end of February 2026, for a total of approximately nine months of monitoring.

11.2 Targeted area monitoring

In addition to the Broad Area Monitoring, the following section details the work plan for Targeted area monitoring that will be conducted in Kettleman City.



11.2.1 Field materials and procedures

The Aerodyne Mobile Laboratory (AML) is a box truck operated by a team of 4-5, including a driver and scientists/technicians. The day begins with a vehicle inspection by the driver and instrument status inspections by the team. Driving and on-service hours are logged via mobile application to comply with DOT rules. Calibration days and "hard down days" are used to allow drivers (and the field team) to rest. The Aerodyne Mobile Laboratory will average 5.5 active monitoring days per week. The data rate varies by instrument, with most instruments reporting 1 second data, and some instruments reporting slower data (5 mins, 30 mins). Data is also collected while stationary, on down days, and overnight.

11.2.2 Field communication and coordination

Aerodyne Research will operate as follows while in the field to ensure safety and meet measurement goals laid out for the project:

- The Aerodyne Principal Investigator (PI) communicates overall science goals to the Aerodyne Project team.
- At all times, there is one "field lead" assigned to the Aerodyne Mobile Laboratory. This scientist ensures the
 monitoring plan and science goals are carried out. The field lead communicates with the rest of the field
 team (3-4 additional people) in the mobile lab, with the Aerodyne Principal Investigator (if not in the field),
 and with the Aclima PML point of contact.
- Each main instrument type has an expert operator, who is responsible for their instruments functionality, calibration, and data stream. Instrument operators communicate with the field lead regarding any issues encountered.
- Additional engineers and scientists back at Aerodyne are available for remote consult on any major instrument issue.
- A daily "Captain's Log" is created each day and synched to a shared field project folder. The Captain's Log
 will contain high-level notes like weather, status of consumables, staffing, daily goals, and major instrument
 issues. The Captain's Log is also used to collect manual time-stamped notes while mobile.
- A dedicated computer and display provides synthesized time series and mapping data to the scientists aboard the mobile lab. This display is used by the "passenger" (person in the front passenger seat) to direct the mobile experiment. This screen can display live locations of persistently elevated concentrations, map the roads driven, and log additional notes tagged to specific start-stop periods.
- The field project will be staffed in shifts, and the Aerodyne PI organizes virtual handoff meetings before each major shift change to ensure science goals and any instrument issues are communicated. Staffing is also planned to ensure overlap in the field teams.
- The mobile lab driver is responsible for road safety and daily vehicle inspection, including a check that all equipment in the cargo area is secured.
- Prior to conducting monitoring, the Aerodyne team will meet with project representatives from UNIDOS
 Network in order to gain a proper understanding of the local context around the air quality concerns
 specified in the CAMP for targeted area monitoring. Communication channels may also be established during
 this meeting in order to provide real-time updates from community members about current air quality
 conditions or expected events that may impact air quality during the monitoring period.



11.2.3 Timeline: duration, frequency, milestones, and deadlines

The Aerodyne Mobile Laboratory will conduct monitoring in Kettleman City for a duration of approximately 1 week in a time period to be determined between August 8, 2025 and September 6, 2025. See Section 8.3 for details on the duration and frequency of monitoring.

How will data be used to take action?

12. Evaluating effectiveness

The monitoring work plan and data will be evaluated across all stages of the monitoring phase of SMMI to ensure that air monitoring objectives are being met. These evaluations include on-going processes during monitoring, data review while collection is ongoing, and at data verification at the end of the monitoring period after all data has been collected. For additional details on these processes, see the detailed QA documentation in <u>Appendices C, D, E and F</u>. Additional details about the public data release can be found in Section 14.2 and Section 10 of <u>Appendix F</u>.

12.1 Evaluating effectiveness during the monitoring period:

Effectiveness will be continuously evaluated during the active data collection phase to ensure the monitoring is progressing as planned and that potential issues are identified and addressed promptly. This ongoing evaluation will involve several key components:

- Manual Data Review: Aclima staff will conduct weekly assessments of vehicle and sensor performance, as
 well as overall data quality. These reviews consist of visual review of time series data from all sensors on each
 deployed vehicle, responding to automated alerts for specific known patterns of device issues (e.g. sample
 line leaks) and addressing through corrective actions as needed, and a review of other associated diagnostic
 data. The Aerodyne team conducts manual data review using an approach outlined in Appendix G.
- Automated Data Quality Checks: The data processing pipeline includes automatic status indicator flags that
 signal when measurements fall outside predefined environmental or physical specifications for the sensors.
 These flags serve as immediate alerts for potential sensor malfunctions, data anomalies (e.g., negative values
 or concentrations outside the sensor's range), or issues with supporting systems like flow rates. These checks
 occur as data streams through the data processing pipeline, in near real-time.
- Contextual Data Review: Where available, data from regulatory monitoring sites within the mapping area will
 be used to provide context for large-scale air quality trends over time. This allows for a comparison of
 Aclima's sensor data with established networks, helping to identify whether observed patterns are consistent
 with broader trends or potentially indicative of issues with Aclima's measurements. Factors such as distance
 between mobile and stationary measurements, road type, site type, and temporal aggregation will be
 considered during these comparisons. These evaluations occur on a weekly basis as part of the manual
 review process.



- Measurement Quality Objectives: Acceptable quantitative criteria for data quality indicators at the
 individual sensors (e.g., precision and bias) will serve as benchmarks for evaluating effectiveness. These are
 referred to as calibration acceptance criteria in Aclima's detailed Quality Assurance document (<u>Appendix C</u>)
 In addition to calibration prior to the start of monitoring, all AMNs will receive calibration checks (and
 subsequent recalibrations) on a 6-8 week basis over the 9 month monitoring period, including at the end of
 monitoring. The Aerodyne team will evaluate their QA checks according to acceptance criteria detailed in
 <u>Appendix G</u>.
- Data Verification: A thorough data verification process will be conducted on an ongoing basis throughout the monitoring period in order to produce finalized data in monthly increments, with the first delivery occurring four months after monitoring begins. The data verification process consists of 1) a manual data review process, 2) a review of calibration results, 3) the application (where necessary) of adjusted calibration parameters and data quality flags for data reprocessing, and 4) a final review of the reprocessed data with applied calibration adjustments and data quality flags. During this process, all of the above data quality checks described above are re-evaluated just prior to and immediately after any reprocessing of data occurs. The Aerodyne team conducts a similar data verification process as Aclima and on the same delivery cadence; specifics are outlined in Appendix G.
- Evaluating Broad Area Monitoring Completeness: Aclima mobile monitoring campaigns are designed to
 repeatedly drive roads in a monitoring area such that the roads are visited 20 times on average. An
 automated drive planning system evaluates the amount of driving coverage throughout a region on a daily
 basis and directs drivers to prioritize visiting roads in relatively underdriven regions. Additionally, Aclima
 analysts continuously monitor temporal and spatial driving coverage in the event that manual drive routing is
 needed to prevent regions with unexpectedly low numbers of visits. This is tracked by measuring the average
 number of measurements on each road by census block group.
- Evaluating Targeted Area Monitoring Completeness: The Aerodyne team will evaluate the completeness
 and representativeness in a way that is appropriate and responsive to the targeted area study conducted. In
 Kettleman City, the approach is a general survey of areas in the vicinity of community concerns and known
 sources. The number of repeat passes will be analysed along with pass-to-pass variability by scientists in
 charge of the data collection to evaluate the completeness of monitoring.

12.2 Evaluating effectiveness at the end of the Monitoring Period:

A comprehensive evaluation of the overall effectiveness of the community air monitoring initiative will be conducted at the conclusion of the data collection and verification phases. This final evaluation will be documented in the SMMI final report and will provide an overall assessment of the uncertainty associated with the collected data and derived data products. This will encompass various sources of error, including intra-network variability (uncertainty between different monitoring platforms), inter-network comparability (comparison with other monitoring networks, such as regulatory sites), sensor specific measurement errors, and modeling and sampling errors.

Comparison with External Data: The report will include comparisons between Aclima's measurements and
data from regulatory stationary monitoring sites. These comparisons will evaluate the accuracy and precision
of Aclima's mobile measurements against established reference methods over various timescales. Metrics
such as Mean Bias Error (MBE), Mean Absolute Error (MAE), and R² will be used to quantify the agreement
between the datasets. Additionally, comparisons of the modeled ambient concentration estimates with



annual averages from nearby regulatory monitors will be included to assess the overall performance of the data products

- Aclima and Aerodyne Calibration Results: Results from the calibration events conducted on Aclima's Mobile Nodes (AMNs) and the Aerodyne team, both before, during, and after their deployment. These results will help characterize the typical measurement error at the device level by comparing sensor readings to reference instruments and amongst themselves.
- Stationary Comparison with Regulatory data: This evaluation will compare data from Aclima's stationary AMNs, collocated at regulatory monitoring sites, with the measurements from those regulatory monitors. This comparison will help determine the measurement error and how Aclima's data aligns with the established regulatory network's data.
- Mobile Comparison with Regulatory data: This analysis will involve comparing in situ measurements
 collected by Aclima's mobile monitoring fleet near regulatory sites with the concurrent data from those
 stationary sites. This will provide insight into the agreement between mobile and stationary measurements,
 considering both measurement errors and the natural spatial and temporal variability of pollutants. This is
 only relevant for Aclima's data, not the Aerodyne data.
- Ambient Concentration Comparison with Regulatory data: The hyperlocal ambient concentration
 estimates will be compared with long term average concentrations from regulatory stationary monitors. This
 will help assess the overall uncertainty in Aclima's estimates, including factors like modeling and the
 temporal sparseness of mobile measurements. This is only relevant for Aclima's data, not the Aerodyne data.
- Analysis of completeness and representativeness: Analysis will be performed to show how well distributed
 data collection is across times of day, days of week, and season. Additionally, the number of passes in each
 location will be reported. Similar analyses will be conducted in similar ways for both the targeted and broad
 area monitoring approaches.

12.3 End of monitoring

Monitoring ends when deployments for all vehicles (AMPs and PMLs) are complete. Given the fixed time constraints for the SMMI final report to be completed by May of 2026, the broad area monitoring period will end after 9 months of data collection. In order to determine successful completion at the end of 9 months the monitoring team will evaluate whether:

- Monitoring coverage has exceeded the required minimum percentage coverage requirement for priority communities within the SMMI-wide monitoring areas (i.e. across all CNCs, not just Kettleman City)
- Data gathered is sufficiently representative of the seasonal, time of day, and day of week variation across the
 monitored area (i.e. not biased by data collection at one specific time), such that they can support the
 objectives, sub-objectives and presentation plans as uniquely defined in this monitoring plan
- Data gathered is sufficiently representative of the spatial variation in air quality across the monitored area, such that they can support the objectives, sub-objectives and presentation plans as uniquely defined in this monitoring plan

The results of all quantitative evaluations of effectiveness listed above will be included in a Quality Assurance report to accompany the final project report. Details on the above activities will be included for both Aclima and the Aerodyne teams.



13. Data analysis and interpretation

13.1 Preparation of finalized datasets

As described in Section 10 on data management (and in detail in the Data Management documentation in <u>Appendix E</u>), 1-second "finalized" data collected by all sensors and instruments will go through several data verification and validation protocols, and transformation steps before they are described as finalized and made available to CARB.

"Finalized" data is defined as sensor signals transformed to geophysical quantities of measurement (Level 2a), calculated using the sensor signal plus associated physical measurements directly related to the measurement principle such as temperature and relative humidity measurements. Data flagged for artifacts will also be included.

13.2 Aclima analysis, interpretation, and visualization of data

Mobile monitoring data gathered under this CAMP are intended to facilitate focused actions by communities and CARB, including any future work to identify and prioritize locations for more comprehensive community-scale air monitoring, or develop Community Emissions Reduction Programs (CERPs).

To support this potential future work, the monitoring team will generate a series of additional datasets that can help communities better understand and interpret the data in the context of the concerns detailed in this CAMP. These datasets will be in addition to the finalized 1-second data provided directly to CARB and require further processing as described in Section 10 in this monitoring plan. Appendix E Section 2.3 discusses the additional data that will be reported including the quantitative metrics that will be associated with enhancements). These datasets can support identifying and characterizing sources or identifying disproportionate spatial and temporal impacts within a community.

The following is a brief description of the different possible analysis and visualization approaches used by SMMI. In some cases, the analysis approaches are matched with specific monitoring approaches, but there can be various combinations of monitoring and analysis approaches that could be selected to appropriately achieve the desired monitoring objectives.

- Clusters of enhancement detections on a map Identifying locations of pollutant enhancements (high
 concentrations above background levels) on a map. Clustering or grouping of pollutant enhancements refers
 to identifying locations where multiple enhancements of the same pollutants are detected at multiple
 different times over the course of monitoring.
- Statistics on enhancement detections Statistical values that describe how often enhancements were
 detected in a specific location. Examples include number of detections, the number of detections per visit, or
 the number of distinct days of detections.
- Chemical speciation bar graph or pie chart A bar chart or pie graph that indicates the relative concentration of different key pollutants of interest in a specific location. This can represent the pollutants within an enhancement detection, averaged across an enhancement cluster (i.e. multiple enhancements in the same location), or in ambient concentrations of background air.
- **Diurnal plot of enhancement detection events** This analysis shows the frequency of enhancement detections in a particular location by hour of day. This analysis requires balanced sampling across different times of day in the same location.

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- Ambient concentration gradients over plume transects Displaying ambient concentrations as they vary in space in the downwind region of an air pollution plume. This type of analysis is generally paired with the plume transect monitoring approach, but a general survey approach may also be appropriate in certain situations.
- Ambient concentration map of key pollutants Displaying a map of ambient concentrations that are generally representative over the time period that monitoring takes place. Typically the general survey monitoring method or broad area monitoring is required for this type of analysis.
- Area-wide chemical breakdown bar graph or pie chart A bar graph or pie chart showing the relative proportion of different pollutant concentrations detected on overage over a particular area of covered. Typically the general survey monitoring method is most useful for this type of analysis

These example visualizations can help address the community specific concerns in Kettleman City for the concerns assigned monitoring objectives in Table 4.1. The map of ambient concentration estimates shown in Figure 13.1, below, is directly responsive to the monitoring objective of identifying disproportionate impacts (e.g. mobile source emissions around major roadways such as Interstate 5 and SR-41). The heat map of locations of persistently elevated concentrations of TVOC is responsive to the monitoring objectives of characterizing sources (e.g. near the waste landfill or water treatment operations). Note that broad area monitoring may result in visualizations that provide information (for example clusters of enhancements) about additional concerns not specifically assigned monitoring objectives or unknown sources not listed specifically as community concerns here.

Some example forms of final data visualizations are shown below.



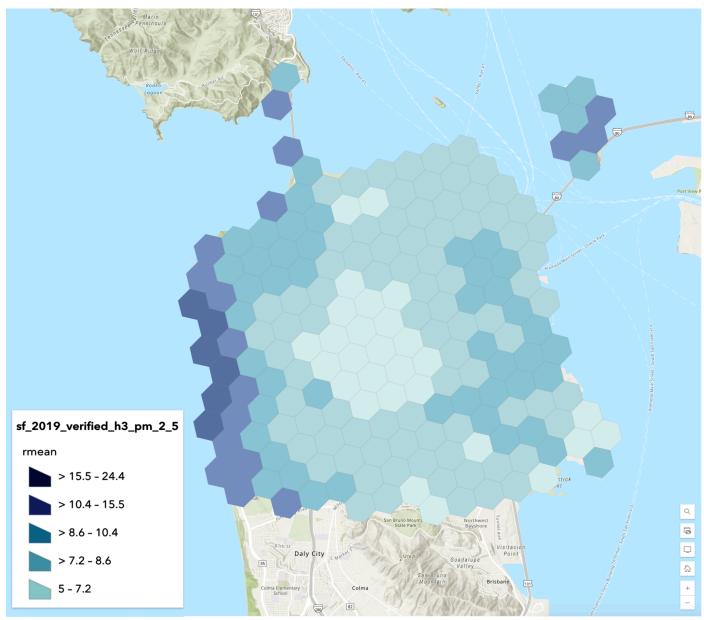


Figure 13.1: Example of a map of ambient concentration of PM_{2.5} over a specific area plotted using hexbins. In this type of map, the color indicates pollutant concentration. In this example, colors indicate PM_{2.5} concentrations for data collected over a 1 year time period in San Francisco, CA. Map data © <u>Mapbox</u>, © <u>OpenStreetMap</u>.



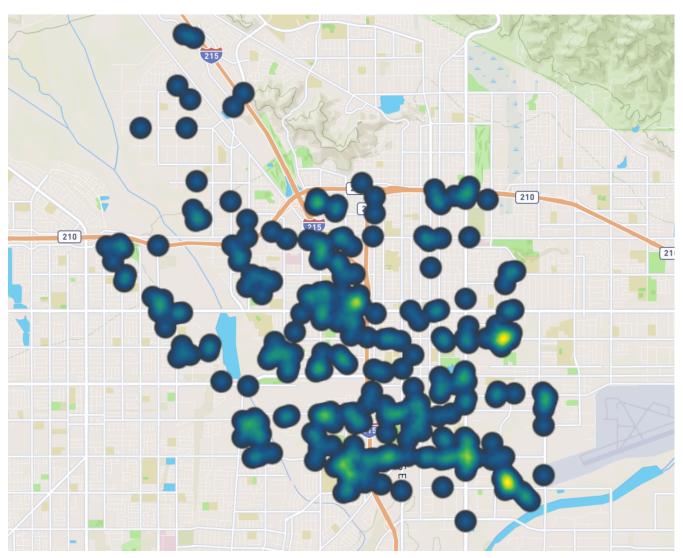


Figure 13.2: Example of plotting an enhancement-based dataset (TVOCs) as a heatmap. In this type of map, the density of individual enhancement events are shown, where the brighter colors indicate a higher density of detected enhancements. In this example, data collected over a 3 month period in San Bernardino, CA are shown. Map data © Mapbox, © OpenStreetMap.

For the concerns assigned specific monitoring objectives in this monitoring plan, the analysis approaches are specified in Table 4.1, in Section 4.3. Appendices D and E provide more detailed descriptions of how different analyses are performed and the different implementations of the approaches that are possible. These appendices also list important limitations that will be taken into account at the analysis stage and will be communicated in the public presentation of results. The specific implementation of these approaches will be determined after the data is collected and evaluated. Data from both Aclima platforms and the Aerodyne PML will be analyzed according to the general approaches outlined above.



14. Communication of results to support action

The mobile monitoring data collected in this community will be analyzed and presented to support focused action to reduce emissions or exposure. This requires an accessible visualization, of which Aclima has many. CARB has selected ESRI StoryMaps as their visualization platform.

The project offers Engagement Leads supplemental budgets for capacity building and relationship building to foster the partnerships necessary for translating data into emissions reduction actions.

14.1 Reporting of high concentrations prior to the end of the contract

The primary intent of the SMMI is not for real-time notification. However, during data collection, there may be instances where pollutant concentrations significantly exceed expected levels. To address these situations, a response protocol has been established to ensure that such anomalies are promptly reviewed and assessed in coordination with relevant agencies and shared with community stakeholders. If concentrations exceed the thresholds (defined below), and the detection is deemed viable after analysis and assessment by Aclima or a Partner Mobile Lab, Aclima will inform the local Air Districts or other relevant local authorities. Not every detection will trigger a report. Only after in depth investigation by scientists in the field or remotely via data analysis will a detected event be deemed viable for reporting. Table 14.1 provides the overall framework of the assessment process and reporting structure.

The purpose of reporting observed high concentrations is to protect public health and safety, and while no regulatory action will occur as a direct result of data collected by SMMI, local regulators may decide to conduct additional monitoring or other types of investigations based on these reports. Additionally, while health-based thresholds are used in the notification framework, it should be emphasized that this process will not definitively determine whether a health threshold has been officially exceeded.



Table 14.1: Overall framework of the assessment process and reporting structure

Pollutant	Initial Assessment Protocol	Data Reporting and Communication to Local Air Districts or Other Relevant Local Authorities by Aclima	Community Updates
Relevant threshold: 100 ppm methane ^a	Aclima: Initial Detection Detection above threshold Investigation See Section 14.1 text for description	Aclima: If detection qualifies – Prepare and Submit Report: Location/Time of Event Historical detections in the area Classification of methane source (thermogenic or biogenic) Description of the local environment (land use, sources, notable features) Placeholder for Summary of findings and next steps Notify local utility company (or air district as appropriate based on source) within 2-3 business days of verification Email the completed report to designated CARB contacts within 2-3 business days of verification	 Monthly Summary Reports will be posted to the CARB website and will include: A summary of reports generated Locations and timestamps of detections Results of preliminary analysis Actions taken or recommended follow-up steps Aclima: A comprehensive summary will be included in the End-of-Campaign Report, covering: All events detected over the course of the campaign Historical patterns and trends Overall progress and response efforts
Toxic Air Contaminants (see table 14.2 for additional details)	PMLs: Initial detection Detection above California OEHHA acute RELs at least twice in the same location Investigation: See Section 14.1 text for description	PMLs: If detection is deemed viable event after analysis and repeated monitoring: • Air district will be notified by Aclima immediately upon verification of the event	CARB: • Monthly Summary Reports will be posted to the CARB website and will include: • A summary of reports generated • Locations and timestamps of detections



- PMLs will prepare and submit report within 3 days of verification:
 - Location/Time of Event
 - Pollutant and concentration
 - Historical detections in the area
 - Description of the local environment (land use, sources, notable features)

Note: Reporting timelines may vary based on the instrumentation used, QA/QC protocols, and time required to validate findings.

- Results of preliminary analysis
- Actions taken

Aclima:

- A comprehensive summary will be included in the End-of-Campaign Report, covering:
 - All events detected over the course of the campaign
 - Historical patterns and trends
 - Overall progress and response efforts
- a) Threshold for methane is not based on a specific health-based action limit, but is based on historical data collected by Aclima, indicating values typically associated with large significant natural gas leaks.
- b) Air toxics contaminants are those that may be measured PMLs and monitored in real time by scientists aboard the mobile platform.

The following provides additional details on the investigation process that will occur after an initial detection above the indicated threshold concentrations. For methane, Aclima analysts initiate this investigation remotely typically within 24 hours of the initial detection. Follow up monitoring, if needed, may take days to weeks to complete. For air toxics (or methane detected on the PMLs), the PML teams have technical staff on-board to follow up in real time in most cases. Otherwise the follow up monitoring will occur as soon as possible. The purpose of this process is to identify anomalously high pollution events and sources and Aclima reserves the right to revise the listed thresholds based on data collected over the course of monitoring (in collaboration with CARB) in cases where exceedances are frequent and follow up monitoring significantly detracts from the planned targeted area monitoring or the reporting of frequent exceedances as individual events become infeasible.

Methane

Detection of methane at the 100 ppm threshold or above typically (but not always) indicates a natural gas leak from residential distribution systems. The following process will be followed to investigate each triggering methane detection:

- 1. Measurement diagnostics check
- 2. Evaluate source type using ethane/methane ratio and presence of CO
 - a. For Thermogenic (i.e. fossil in origin) source type (ethane/methane ratio between 1-10% and no concurrent CO enhancement)
 - i. Check historical data and count the number of distinct days with enhancements > 5 ppm
 - ii. Report locations where number of days is 3 or higher
 - iii. Track locations with less than 3 days and follow up weekly



- iv. Check contextual information about location to determine whether there are obvious sources otherwise assume coming from underground natural gas distribution lines
- v. Report to local utility if gas distribution system suspected, otherwise to the air district
- b. For Biogenic source type (ethane/methane ratio <1% or no concurrent ethane detected):
 - i. Check whether there is any correlation between ethane/methane to determine whether the source is a biomethane or renewable natural gas blend (biogenic methane blended with traditional natural gas), which typically has an ethane/methane ratio less than 1%. Follow instructions for natural gas source types above.
 - ii. Check historical data and count distinct days with enhancements > 5 ppm
 - iii. Check contextual information about location to determine whether there are obvious sources
 - iv. Use scientific judgement and contextual information to determine whether to report to local air district
- c. For mobile source type (strong concurrent CO enhancement):
 - i. No further action

Air Toxics

Detection of individual air toxics above the notification threshold (as indicated in Table 14.2) will trigger a follow up investigation according to the following process:

- 1. Measurement diagnostics check
- 2. On-board technical operations team determines whether the likely source is transient (e.g. a passing vehicle) or a possibly persistent stationary source or unknown source.
 - a. Likely persistent stationary source or unknown source:
 - Vehicle operator returns to location of initial detection as soon as possible to do follow-on measurements. The vehicle operator will consider whether immediate follow-up measurements would adversely impact the ability to measure a priority source, and will schedule a follow-up accordingly.
 - ii. If the threshold is exceeded at least twice in the same location, a 1 hour average measurement will be collected in the vicinity of the initial detections. The measurement may be collected while parked or in motion to better characterize the plume extent, at the discretion of the on-board technical team.
 - iii. The local air district is notified if 1 hour average concentrations of any pollutant measured reaches or exceeds an acute recommended exposure limit (CA OEHHA Acute REL), listed in Table 14.2. Note that for benzene, toluene, and acrolein the uncertainty of these measurements in real-time (prior to post-processing and final QA/QC) may be as high as a factor of 2. Exceedance determinations for all species will also include uncertainties due to calibrations and ambient conditions (humidity, temperature, pressure), and judgement from the scientific team will be used to determine whether borderline cases should be reported or not.
 - b. Mobile or other transient source (for example, an exceedance detected while refueling the vehicle at a gas station):
 - i. No further action is required



Table 14.2: Thresholds used for air toxics event notification

Pollutant	Action Threshold ^{a,b}
formaldehyde	45 ppb
benzene	8.5 ppb
toluene	1.3 ppm
acrolein	1.1 ppb
carbon monoxide	20 ppm

- a) The thresholds are based on health action limits (<u>California OEHHA Acute REL</u>), however, it should be noted that these are limits only used as a benchmark to trigger follow up investigation and do not indicate that these health action limits have actually been exceeded. The event will only be reported if the scientists deem the detection to be a viable event based on their investigation. Additionally, the species detected by this method will be uncalibrated signals that may have high uncertainties (up to a factor of 2 in some cases)
- b) Aclima reserves the right to update the action thresholds over the course of monitoring based on data collected over the course of monitoring, for example, if it is found that the number of threshold exceedances are higher than anticipated.

14.2 Public Data Access

Upon completion of the contract, CARB will make the finalized monitoring data available for public access through the CARB AQview website. Data for each region and pollutant will be provided in standardized, comma-separated values (CSV) format to ensure broad compatibility with commonly used data analysis tools and software. This approach supports transparency, encourages independent analysis, and facilitates community and academic engagement with the air monitoring results.

14.3 Community Story Maps

Aclima will deploy the finalized raw data and appropriately-selected data analyses (described in Sections 13.2 and 13.3) in accessible online, public, interactive and free-to-use visualizations built on the Esri platform. These visualizations will be in the format of a customized platform built with Esri StoryMaps and hosted by CARB. A range of analyses are available to identify potential sources and to identify locations of disproportionate impact, drawing on data collected through both targeted area monitoring conducted by Aerodyne and broad area monitoring conducted by Aclima. Only finalized quality assured data will be incorporated into public facing visualizations.

14.4 Final Report

A final report will be delivered to CARB at the end of the contract, May 19, 2026. This report will provide a comprehensive analysis of the data collected by Aclima and the Partner Mobile Laboratories during the SMMI and will include the following sections:

Executive Summary: The report will include an executive summary to highlight the key takeaways, recommendations, or limitations of the report.

Summary and Timeline of Air Monitoring: The report will provide a summary of the air monitoring activities conducted and a timeline of when these activities took place. This will offer context and background on the project.

Kettleman City Community Air Monitoring Plan

Statewide Mobile Monitoring Initiative



Discussion of Data Collection, Validation, and Analysis: The report will detail how the air quality data were collected using Aclima's mobile monitoring platforms and partner mobile laboratories. It will also explain the quality assurance and quality control (QA/QC) procedures implemented to ensure the data's integrity, including how the data were validated. Furthermore, the report will describe the methods used to analyze the collected data, potentially including analyses for identifying pollution sources and areas of disproportionate impact like diesel indications, locations of persistently elevated toxic air contaminants, and natural gas leaks.

Summary of Significant Findings and Conclusions: The report will present a summary of the key findings from the air monitoring campaign. This will include ambient concentrations and any identified pollution enhancements. These findings will be presented in a manner understandable to a non-scientific audience.

Recommendations and Next Steps: Based on the findings, the report will offer recommendations for potential next steps. This may include suggestions for tracking progress or verifying results achieved by community emissions reduction programs, or for future, more comprehensive monitoring efforts.

Dissemination Plan: The report will outline how the data and the findings will be disseminated and discussed with appropriate decision-makers so that the information can lead to the intended actions for emissions reduction and public health improvement. This will include the use of publicly accessible data visualizations such as ESRI StoryMaps. The report will also mention the virtual public meeting organized to explain project results and discuss possible next steps.

Public Meeting: To better help community members understand the content of the final report in an accessible manner, Aclima and California Air Resources Board staff will organize online meetings by air district (or sub-group within air district if necessary) to explain project results, answer questions, have community members share their experiences engaging with the project, and discuss possible next steps. UNIDOS Network will play a major role in outreach and promoting community attendance at this meeting. This meeting will be conducted in English with Spanish interpretation and designated Spanish breakout rooms. To ensure further accessibility to results, Aclima will provide one-page result summaries for each community in both English and Spanish that UNIDOS Network can distribute physically or via Whatsapp or text.

Input from Stakeholders: The final technical report will incorporate input from stakeholders across the initiative, including the Project Expert Group, community representatives, air quality officers, and environmental justice leaders.

Accessibility: Aclima will consider accessibility needs for the print document, such as alt text and color design.

The report will be provided to CARB in both PDF and the original electronic format.



Appendices

Full appendices are available here: https://aclima.earth/smmi-camp-appendices

- Appendix A: SMMI Community Engagement Plan (CEP)
- Appendix B: SMMI Community Mileage Allocation
- Appendix C: Aclima Quality Assurance System
- Appendix D: Aclima Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System
- Appendix E: Aclima Hyperlocal Enhancement-based Data Products Quality Assurance System
- Appendix F: Aclima Data Management Plan
- Appendix G: Partner Mobile Laboratory Quality Assurance Project Plan (QAPPs) and Data Management Plans
- Appendix H: Approach for Assigning Targeted Area Studies
- Appendix I: Complete Table of Pollutants and Instrumentation
- Appendix J: Public Comment and Response Documentation
- Appendix K: Community Meeting Evaluations