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AIR QUALITY DIVISION

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February 26, 2009

Mr. Patrick Cunningham, Acting Director  
Arizona Department of Environmental Quality  
1110 W. Washington Street  
Phoenix, Arizona 85007

Dear Patrick  
Mr. Cunningham:

On February 12, 2009, the Arizona Department of Environmental Quality (ADEQ) conducted a general stakeholder meeting to discuss a Proposed Strawman Option for a Revised Eight-Hour Ozone Nonattainment Area Boundary for the new 2008 ozone standard of .075 parts per million. As the designated Regional Air Quality Planning Agency, the Maricopa Association of Governments appreciates the opportunity to comment on the strawman option. On February 25, 2009, the MAG Regional Council took action to support the Strawman Option for a Revised Eight-Hour Ozone Nonattainment Area Boundary proposed by the Arizona Department of Environmental Quality (see attachment).

At this time, we would also like to request that you notify MAG regarding the upcoming ADEQ recommendation to the Governor and the Governor's recommendation to the Environmental Protection Agency. Thank you again for the opportunity to comment on this important air quality issue. If you have any questions, please do not hesitate to contact Lindy Bauer or me at (602) 254-6300.

Sincerely,

Dennis Smith  
Executive Director

cc: Nancy Wrona, Arizona Department of Environmental Quality  
Ira Domsy, Arizona Department of Environmental Quality ✓

A Voluntary Association of Local Governments in Maricopa County

City of Apache Junction • City of Avondale • Town of Buckeye • Town of Carefree • Town of Cave Creek • City of Chandler • City of El Mirage • Fort McDowell Yavapai Nation • Town of Fountain Hills • Town of Gila Bend  
Gila River Indian Community • Town of Gilbert • City of Glendale • City of Goodyear • Town of Guadalupe • City of Litchfield Park • Maricopa County • City of Mesa • Town of Paradise Valley • City of Peoria • City of Phoenix  
Town of Queen Creek • Salt River Pima-Maricopa Indian Community • City of Scottsdale • City of Surprise • City of Tempe • City of Tolleson • Town of Wickenburg • Town of Youngtown • Arizona Department of Transportation



February 27, 2009

Ms. Nancy Wrona, Director  
Air Quality Division  
Arizona Department of Environmental Quality  
1110 W. Washington St.  
Phoenix, AZ 85007

**Re: Comments Air Quality Plan - Revised 8-Hour Ozone NAAQS  
Nonattainment Boundaries**

Dear Ms. Wrona:

Gila River Power, LP operates a nominal 2,200 megawatt combined-cycle, natural gas-fired power plant located in Gila Bend, Maricopa County. Operation of the Gila River Power Station (GRPS) is authorized by Maricopa County Air Quality Department (MCAQD) Title V Air Operation Permit Number V99-018.

In 2008, EPA revised the ozone National Ambient Air Quality Standard (NAAQS) by lowering the previous 8-hour standard of 0.08 parts per million (ppm) to 0.075 ppm. It is our understanding that the Arizona Department of Environmental Quality (ADEQ) is currently in the process of preparing a Technical Support Document (TSD) concerning ADEQ's recommendation to EPA on what revisions, if any, need to be made to the boundaries for the Phoenix ozone nonattainment area to address the new 8-hour ozone standard. The TSD will be sent to Governor Jan Brewer for final approval and then submitted to EPA Region 9. The deadline for Governor Brewer to submit recommendations to EPA is March 12, 2009.

Based on ADEQ material provided at the February 9th, 2009 ozone stakeholders meeting, we wish to express our concern regarding the "Strawman Option for Ozone Nonattainment Area". This option shows a suggested change to the current ozone nonattainment area boundaries to include the GRPS. Based on the shape of the suggested ozone nonattainment boundary, the proposed new boundary for the Gila Bend area appears to have been developed for the sole purpose of including the GRPS.

As noted in the ADEQ presentation material, major factors pertinent to ozone nonattainment boundary determinations shall include the following:

- Air quality data
- Emission sources, locations, and contributions to ozone
- Population density and degree of urbanization
- Traffic and commuting patterns
- Growth rates and patterns
- Meteorology
- Geography/topography
- Jurisdictional boundaries
- Level of control of emission sources

Ms. Nancy Wrona  
February 25, 2009  
Page -2-

As noted in your February 6, 2009 stakeholders meeting invitation, a Technical Support Document (TSD) will be available. To date, the TSD which provides the basis for the recommended boundary revision is not available for our review. Please note the following information:

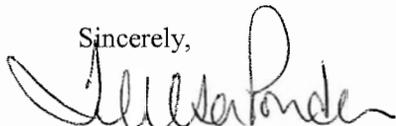
The GRPS is located in the rural, low-population density Gila Bend area approximately 50 miles southwest of metropolitan Phoenix. The GRPS is equipped with state-of-the art emission controls including selective catalytic reduction (SCR) and oxidation catalyst control technologies to minimize emissions of nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs), respectively. Due to its very low emissions of ozone precursors, the GRPS would not be expected to significantly contribute to ozone nonattainment in the Phoenix area. To our knowledge, there are no major new emission sources planned for the Gila Bend area.

When GRPS was originally permitted, the air quality modeling indicated that the facility would not have a significant affect on the nonattainment area at that time. The limited information by ADEQ at the stakeholder's meeting does not indicate that the prior modeling was inaccurate. The ADEQ information to date also does not justify expanding the nonattainment boundary to include GRPS based on population density, degree of urbanization, traffic commuting patterns, growth rates or growth patterns in the area around GRPS. Further, GRPS is already subject to extensive emissions controls as a result of the air quality permit issued to the facility. The information provided by ADEQ also does not provide a justification based on geography, topography or meteorology.

Accordingly, we request that the Phoenix ozone nonattainment area boundary not be revised to include the GRPS based on the lack of demonstration of the major factors pertinent to the ozone nonattainment boundary determination. GRPS will be providing further comments on this issue following availability and review of the ADEQ TSD. Please forward it to our attention as soon as possible.

Your consideration of our comments is appreciated. Please contact me at (520) 241-5035 or [tponder@entegrapower.com](mailto:tponder@entegrapower.com) if you have any questions.

Sincerely,



Teresa Ponder  
EHS Manager  
Gila River Power Station  
Gila River Power, LP

Ken Buchanan  
Assistant County Manger  
Development Services



Terry Doolittle  
County Manager

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February 24, 2009

Writer's Direct # - 520-866-6915

*via 1<sup>st</sup> Class Mail and E-Mail*

Nancy C. Wrona, Director  
Air Quality Division  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, Arizona 85007

Re: Ozone nonattainment boundary recommendation in Pinal County

Dear <sup>CLAW</sup> Ms. Wrona:

This constitutes a request that the Governor of Arizona minimize the scope of the impending recommendation to the EPA regarding an expanded ozone nonattainment designation affecting Pinal County.

I attach a memorandum outlining a recommendation for an adequate, but minimally intrusive, definition of an ozone nonattainment map for Pinal County.

In principle, I submit that areas that violate the standard merit a nonattainment designation. Areas that demonstrably contribute to violations elsewhere merit a nonattainment designation. But a nonattainment designation constitutes an inappropriate mechanism for practicing prevention.

Please refer to map on page 20 of the attachment, showing the ozone monitors in and near Pinal County. Ozone data collected at both the Apache Junction and the Queen Valley monitor violates the new ozone standard. However, ozone levels in the greater expanse of Pinal County, notably at the Combs School, the Pinal Airpark and the Cities of Maricopa and Casa Grande, all comply with the recently tightened 8-hour ozone standard.

The Clean Air Act apparently mandates a nonattainment designation for areas that violate an ambient standard. Accordingly, we accept that Apache Junction and Queen Valley appear destined for a nonattainment designation. As a matter of common knowledge, the principal problem is the fact that under unfavorable meteorological conditions that affected area of Pinal County lies downwind from Phoenix.

Therefore, a logical nonattainment boundary would consist of a rectangle drawn to include Queen Valley and Apache Junction, as shown on page 20 of the attachment.

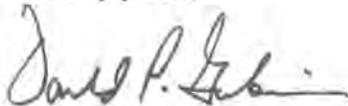
The area to the east consists of a vast expanse of largely uninhabited National Forest and the Superstition Wilderness. The area immediately to the south consists of largely uninhabited State Trust land. While Area A does extend some 11 miles further to the south, that area is already subject to proactive measures imposed under state-law, namely the IM-240 vehicle emission testing program and the requirement for Clean Burning Gasoline ("CBG"). The fact that the Combs monitor continues to show compliance with the ozone standard strongly suggests that those strategies are working, and that an expanded nonattainment area is not justified.

As to the remainder of the County, our comprehensive monitoring network shows compliance with the ozone standard. I am unaware of any technical analysis suggesting that emissions from the greater expanse of Pinal County contribute to ozone violations elsewhere.

Moreover, on an anecdotal level, emissions from commuter traffic constitute the dominant source of emissions in the County. While growth will presumably continue in Pinal County, that growth has been largely residential growth. For the most part, those new residents have relied on commuting into Phoenix for employment. That commuting pattern reflects the lack of primary employment in Pinal County. An ozone nonattainment designation would impose a RACT requirement, which would to a greater or lesser extent discourage new industrial development. That would mean an ozone nonattainment designation would have the perverse effect of encouraging a continued pattern of commuting, which would potentially contribute to rather than mitigate ozone formation.

Accordingly, we ask that ADEQ recommend that the Governor recommend an ozone nonattainment designation for Pinal County that does not exceed a rectangle containing Apache Junction and Queen Valley, as shown on page 20 of the attachment.

Sincerely yours,



Donald P. Gabrielson  
Director

enc.



Development  
Services

To: Don Gabrielson  
From: Scott DiBiase  
Date: February 4, 2009  
RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations

The March 2009 state designation recommendations are fast approaching. In preparation, I have compiled the following information in support of Pinal County's recommendations for an ozone nonattainment area which is slightly larger (to the east which covers the Queen Valley monitor) than the existing 8-hr ozone nonattainment area.

The nine factors that EPA plans to consider in determining nonattainment area boundaries in designations for the 2008 Ozone NAAQS are listed below:

1. Air quality data
2. Emissions data (location of sources and contribution to ozone concentrations)
3. Population density and degree of urbanization (including commercial development)
4. Traffic and commuting patterns
5. Growth rates and patterns
6. Meteorology (weather/transport patterns)
7. Geography/topography (mountain ranges or other air basin boundaries)
8. Jurisdictional boundaries (e.g. counties, air districts, existing nonattainment areas, Reservations, metropolitan planning organizations (MPOs))
9. Level of control of emission sources

1. Air quality data

Pinal County monitoring data for 2006-2008 show that only two monitors in Pinal County currently violate the new 8-hr ozone NAAQS of 0.075 ppm. The Apache Junction and Queen Valley monitors have design values of 0.080 ppm and 0.078 ppm respectively. Map 1 below shows the design values for all ozone monitors in Pinal County.



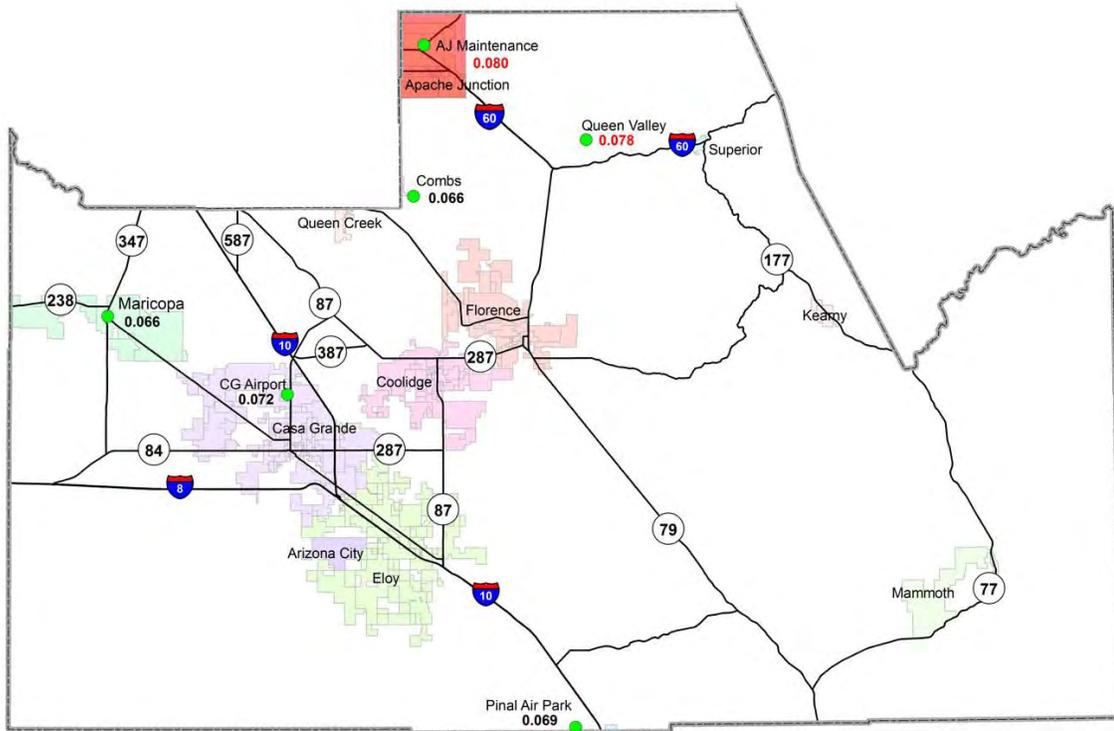
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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and  
recommendations (Continued)

**Map 1. 2006-2008 Ozone Design Values**

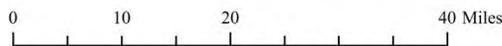


**Pinal County Ozone Monitors  
2006-2008 Design Values\*  
NAAQS - 0.075 ppm**



12/22/08

\* Includes preliminary draft 2008 data



**Legend**

- Ozone Monitor
- Current 8-hr ozone NAA



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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

2. Emissions data (location of sources and contribution to ozone concentrations)

A compilation of emissions data for the most current “official” emission inventory year (2005) in Maricopa shows the following emissions for Pinal County and Maricopa County:

**Table 1. 2005 VOC and NOx emissions (tons) by County**

Source Category	VOC Annual Emissions (Tons)		Ratio (Pinal County/Maricopa County)	NOx Annual Emissions (Tons)		Ratio (Pinal County/Maricopa County)
	Pinal County	Maricopa County		Pinal County	Maricopa County	
Point sources	705	3,792	18.6%	503	2,871	17.5%
Onroad sources	3,735	36,086	10.4%	6,512	67,839	9.6%

The table above shows that Pinal County’s VOC and NOx emissions from point and onroad sources is relatively insignificant in comparison to Maricopa County. Maps 2 & 3 below, show spatial distribution of point source VOC and NOx emissions along with the magnitude of annual emissions.



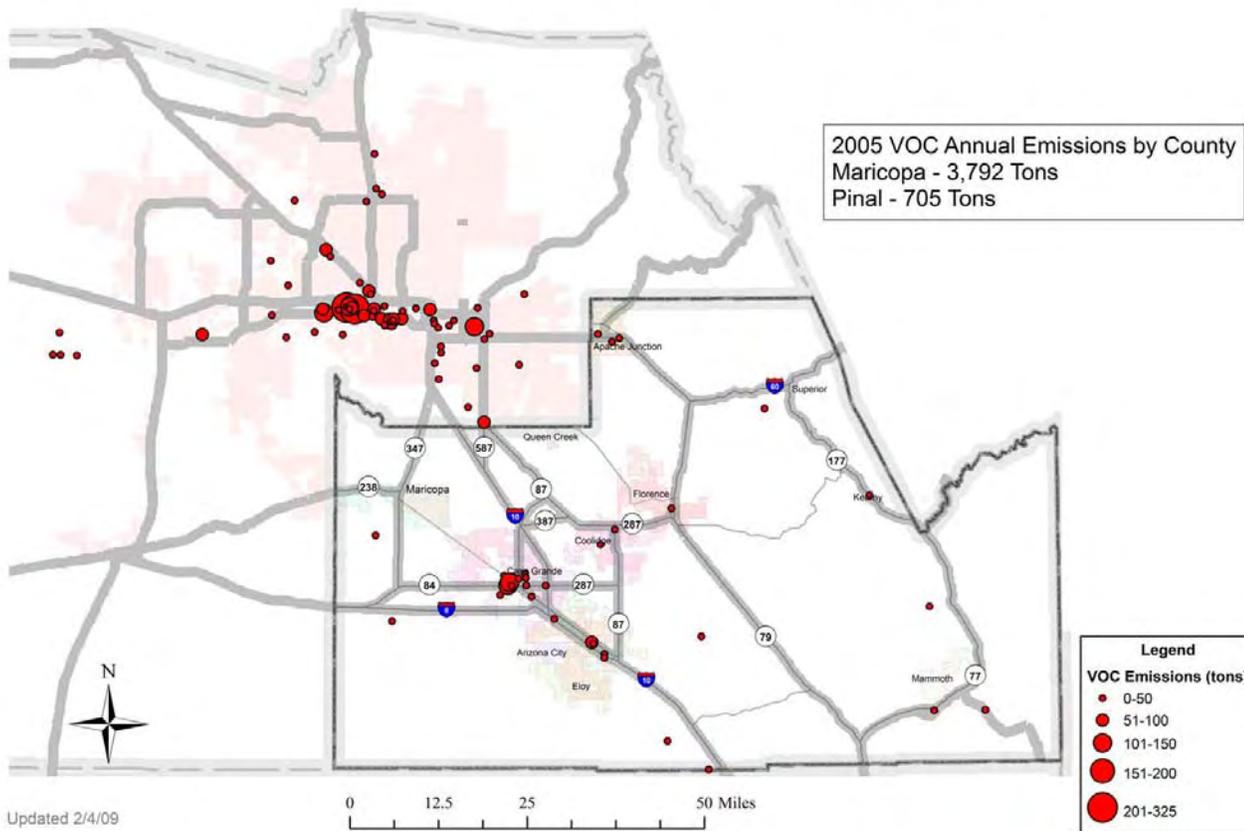
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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

**Map 2. 2005 Point Source VOC Emissions (Tons)**

### 2005 Point Sources VOC Annual Emissions (Tons)



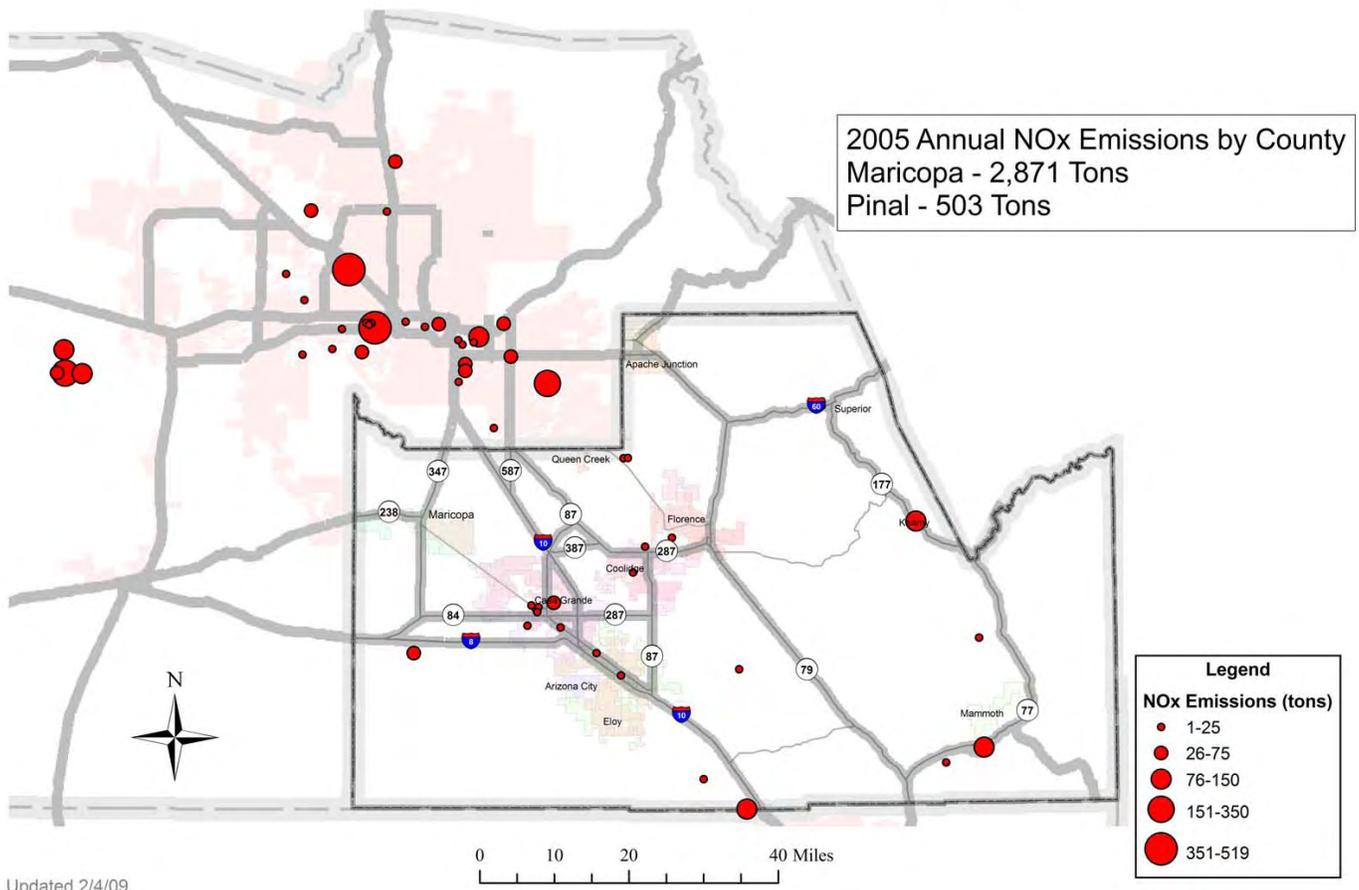


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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

**Map 3. 2005 Point Source NOx Emissions (Tons)**

## 2005 Point Sources NOx Annual Emissions (Tons)





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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

3. Population density and degree of urbanization (including commercial development)

The population in Pinal County has grown in the past several years. The Pinal County population in the last official census in 2000 was 179,727. According to the United States Census Bureau, the 2007 Pinal County estimated population was 299,246. Table #2 below shows a population summary by incorporated city and county for the years 2000 and 2007 according to the United States Census.

**Table 2. Pinal County Population**

City/County	2000 Population	2007 Estimated Population	Estimated Growth (%)
Superior	3,254	3,091	(5%)
Apache Junction	31,814	31,931	0.4%
Florence	17,054	17,781	4%
Eloy	10,375	11,896	15%
Coolidge	7,786	9,570	23%
Kearny	2,249	3,104	38%
Mammoth	1,762	2,427	38%
Casa Grande	25,224	38,134	51%
Unincorporated Pinal County	74,853	119,839	60%
Queen Creek	4,316	23,610	547%
Maricopa	1,040	37,863	3,641%

According to the US Census, Maricopa County has grown from 3,072,149 in 2000 to 3,880,181 in 2007 (growth of 26%).

The number of persons per square mile in Pinal County (56) dwarfs in comparison to Pima County (105) and Maricopa County (422).

4. Traffic and commuting patterns

According to U.S. Census estimates for the 2005-2007 period, Pinal County (incorporated & unincorporated) had a population of workers 16 years of age and older of 101,887 people. In addition, it's estimated that in Pinal County the majority (52%) of working age people in Pinal County work within the county. Of the 48% of working age people in Pinal County that commute to other counties (i.e. Maricopa, Pima, Graham, Gila) it is estimated that 16% use an alternate mode of transportation such as a carpool or vanpool.



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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

According to the Arizona Department of Transportation (ADOT) as of July, 2008 there were 226,208 registered vehicles in Pinal County which is up 7% from the 2007 registration total of 211,509. Compared to Maricopa County registration totals of 2,873,065 and 2,878,196 in 2007 and 2008 respectively (an increase of 0.2%). Pima county vehicle registrations for 2007 were 697,906 and 710,401 in 2008 (increase of 1.7%).

Number of vehicles from Pinal County commuting into Maricopa County

So, assuming that 32% (of the 48% of working age Pinal County residents) drive to work themselves, that results in 32,604 vehicles commuting to other counties. For the remaining 16% that use an alternate mode of transportation it can be assumed that only half of the possible number of vehicles commuting are actually doing so into other counties (since carpooling reduces auto usage at a minimum of 50%). So 8% of the registered vehicles ( $226,208 * 0.08 = 18,097$ ) would be added to the 32,604 vehicles thus resulting in 50,701 vehicles registered in Pinal County commuting into other counties. This 50,701 vehicles (assuming they all commute into Maricopa County exclusively) is a drop in the bucket (1.7%) compared to the 2,878,196 registered vehicles driving within Maricopa County each day.

Additionally, there are statutory requirements that Pinal County registered vehicles commuting into Area A have to go through vehicle emissions testing. Therefore the onroad emissions contribution by the 50,701 of commuting vehicles from Pinal County into Maricopa County is a minimal factor to the overall ozone concentrations in Maricopa County.

##### 5. Growth rates and patterns

There was significant growth in Pinal County's population during the years 2000 to 2007, see table 2. However, the economic and mortgage downturn has affected Pinal County significantly. In particular, the areas of large growth (2000-2007), Queen Creek, Maricopa and unincorporated areas in northern Pinal County have seen a considerable drop in population due to job loss and mortgage foreclosures (1,515 foreclosures in 3<sup>rd</sup> quarter 2008) in 2008. Unfortunately the economy isn't projected to improve in 2009 therefore more population loss is expected in Queen Creek, Maricopa and the northern portions of the unincorporated portion of Pinal County.



RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

6. Meteorology (weather/transport patterns)

Meteorology in Pinal County features typical diurnal wind patterns. Morning down slope winds from the mountains to the east flow into the lower deserts. As the desert heats, the wind pattern reverses and the wind flows from the west towards the east during the afternoon and evening. However the typical wind pattern can and often does change during the monsoon with the afternoon winds from the west being replaced with southeasterly wind direction.

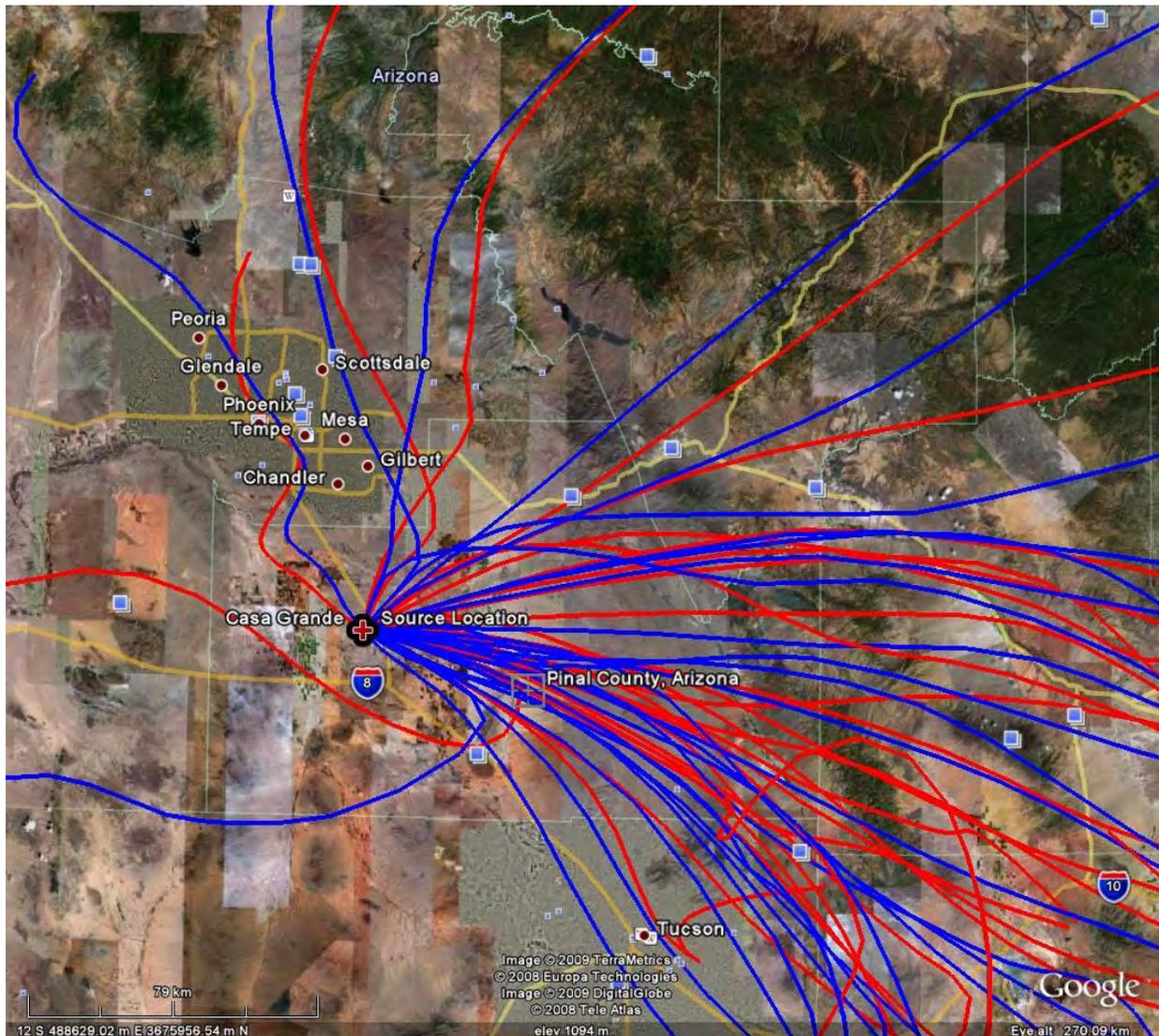
The average high temperature in Casa Grande during the summer months (June-August) is 104°F, 105°F and 103°F respectively. Pinal County is affected by afternoon/evening thunderstorm activity associated with the monsoon and ozone concentrations during this activity are typically reduced as a result of the cloud cover and associated rain.

Below are several Google Earth plots of forward trajectories (by month) which show the wind flow patterns of the summer 2008 ozone season. The trajectories show parcels of air at 10 meter (red line) and 100 meter (blue line) heights starting at the Casa Grande airport at 1 p.m. and moving forward 24-hours.



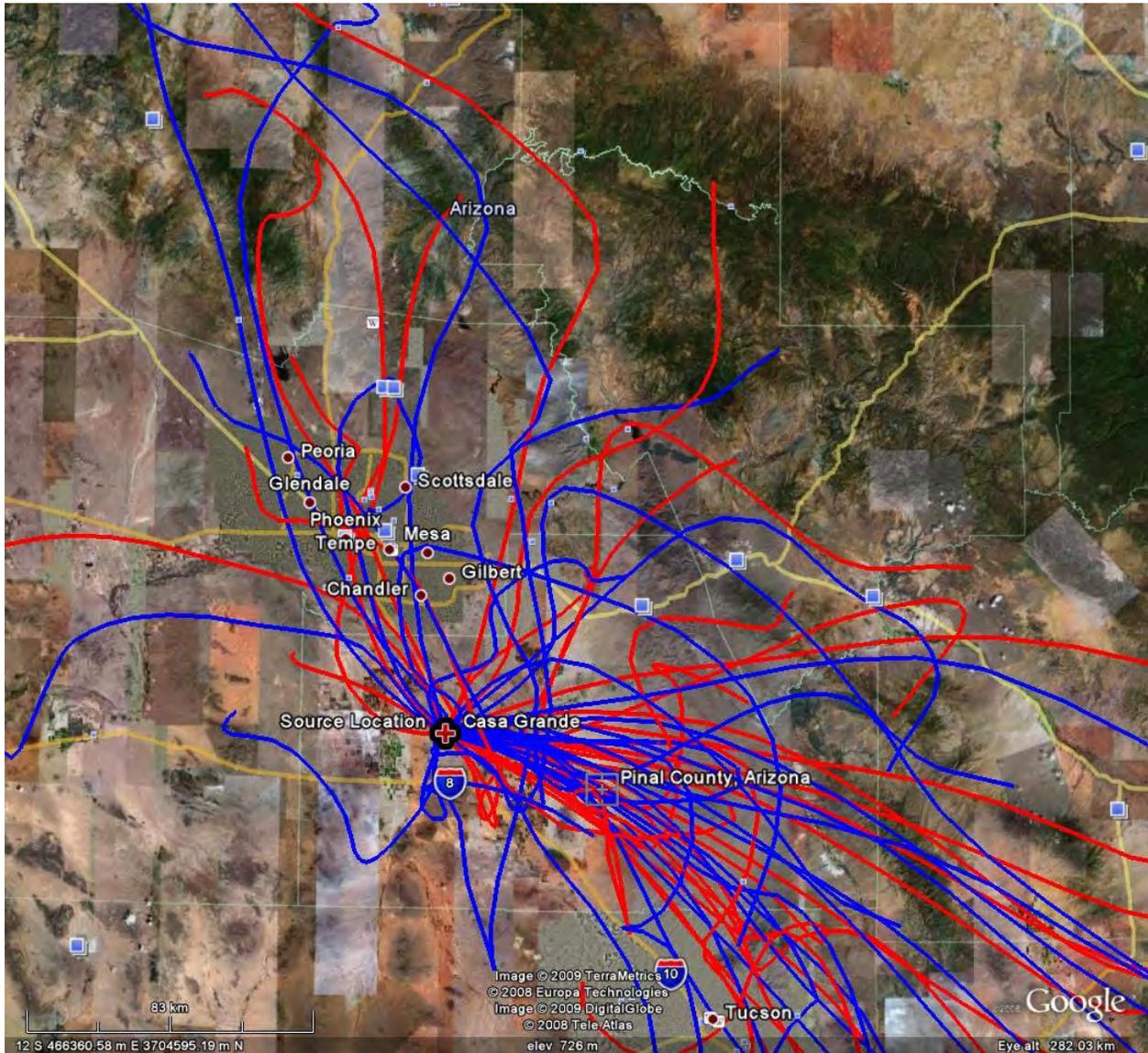
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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)



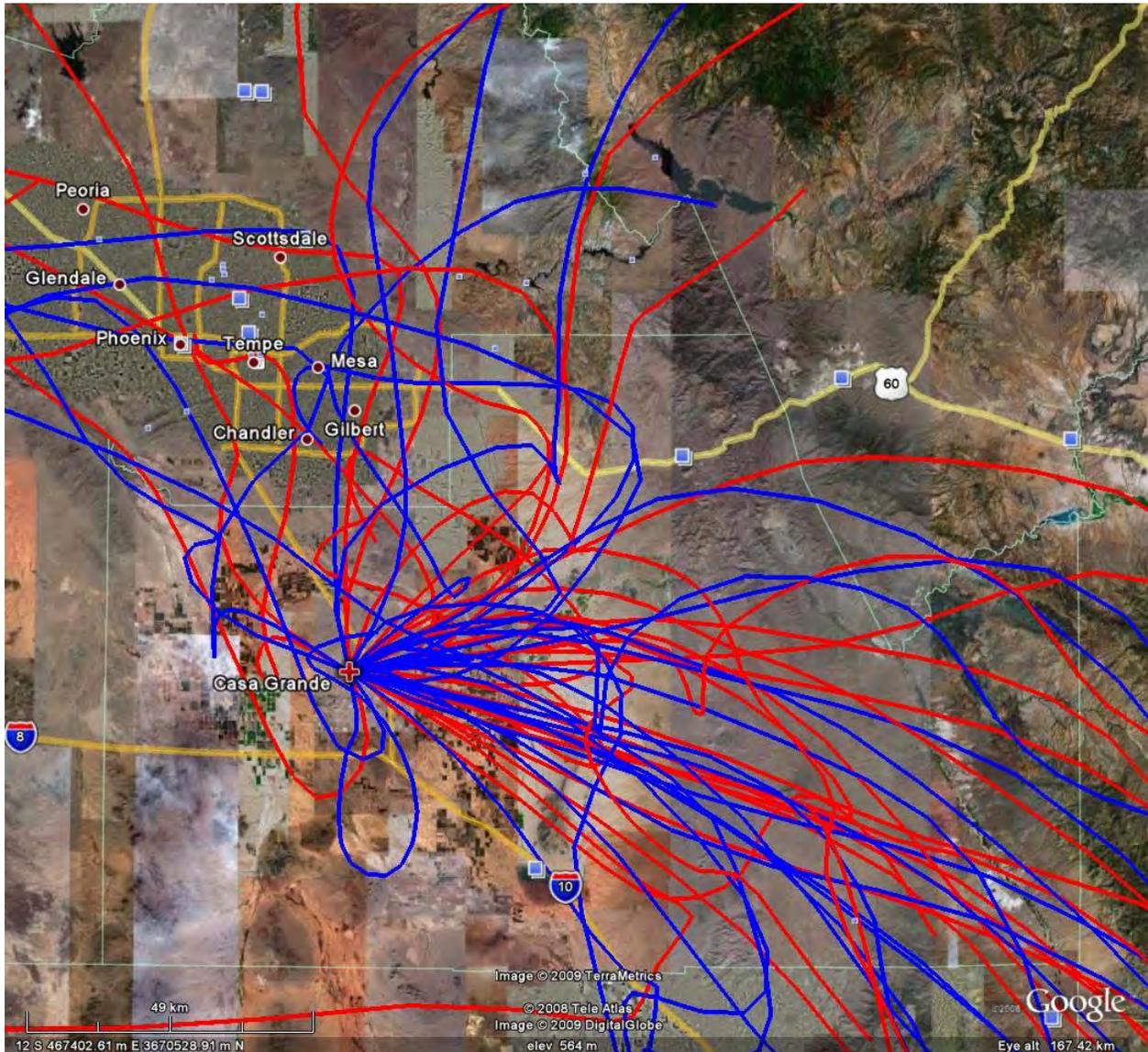
**June, 2008**, 24-hour forward trajectories (Red=10 meter height, Blue = 100 meter height) starting at 1 p.m. 26 of 30 days transport patterns from Pinal County didn't reach Maricopa County. Of the four days where transport from Pinal County reached Maricopa County there were no ozone exceedances.

RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)



**July, 2008**, 24-hour forward trajectories (Red=10 meter height, Blue = 100 meter height) starting at 1 p.m. 21 of 31 days transport patterns from Pinal County didn't reach Maricopa County. Of the ten days where transport from Pinal County reached Maricopa County there were three ozone exceedance days in Maricopa County.

RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)



**August, 2008**, 24-hour forward trajectories (Red=10 meter height, Blue = 100 meter height) starting at 1 p.m. 19 of 31 days transport patterns from Pinal County didn't reach Maricopa County. Of the 12 days where transport from Pinal County reached Maricopa County there were only 2 ozone exceedance days in Maricopa County.

Ken Buchanan  
Assistant County  
Manager

Development  
Services



Terry Doolittle  
County Manager

RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

**Bottom line:** 66 of the 92 days during the summer of 2008 (June-August), transport patterns from Pinal County didn't reach Maricopa County. Of the 26 days where transport from Pinal County reached Maricopa County only 5 were exceedance days in Maricopa County.

On the flip side, transport from Maricopa County into Pinal County was a factor in 10 of 12 of the days where at least one Pinal County ozone monitor had an ozone excursion. See table 3 below for a summary of the 2008 Pinal County ozone excursions.



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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations  
(Continued)

**Table 3. 2008 Pinal County 8-hr ozone NAAQS Excursions (>0.075 ppm)**

Date	Day of week	Site(s)	8-hr ozone concentration (ppm)	Meteorology (local, transport, etc.)
4/22/08	Tuesday	Casa Grande <sup>1</sup>	0.077	Local
5/31/08	Saturday	Queen Valley <sup>2</sup>	0.080	Transport (Phoenix Metro & Mexico <sup>3</sup> )
		Apache Junction <sup>4</sup>	0.079	
		Casa Grande	0.077	
6/1/08	Sunday	Queen Valley	0.077	Transport (SE Valley)
6/6/08	Friday	Queen Valley	0.077	Transport (Phoenix Metro)
6/12/08	Thursday	Queen Valley	0.082	Combination - Transport (Mexico, Pinal County, SE Valley )
		Apache Junction	0.076	
6/13/08	Friday	Queen Valley	0.086	Transport (Phoenix Metro)
		Apache Junction	0.078	
7/2/08	Wednesday	Queen Valley	0.082	Transport (Phoenix Metro)
		Apache Junction	0.081	
7/3/08	Thursday	Apache Junction	0.083	Transport (Mexico & Phoenix Metro)
7/4/08	Friday	Apache Junction	0.081	Transport (Mexico & Phoenix Metro)
7/25/08	Friday	Apache Junction	0.077	Transport (Mexico & Phoenix Metro)
8/8/08	Friday	Apache Junction	0.076	Transport (Mexico & Phoenix Metro)
		Queen Valley	0.076	
8/11/08	Monday	Queen Valley	0.078	Transport (Mexico)

<sup>1</sup> Unofficial Design Value ('06-'08) for Casa Grande is 0.072 ppm

<sup>2</sup> Unofficial Design Value ('06-'08) for Queen Valley is 0.078 ppm

<sup>3</sup> Transport from Mexico impacted only the Casa Grande monitor

<sup>4</sup> Unofficial Design Value ('06-'08) for Apache Junction is 0.080 ppm



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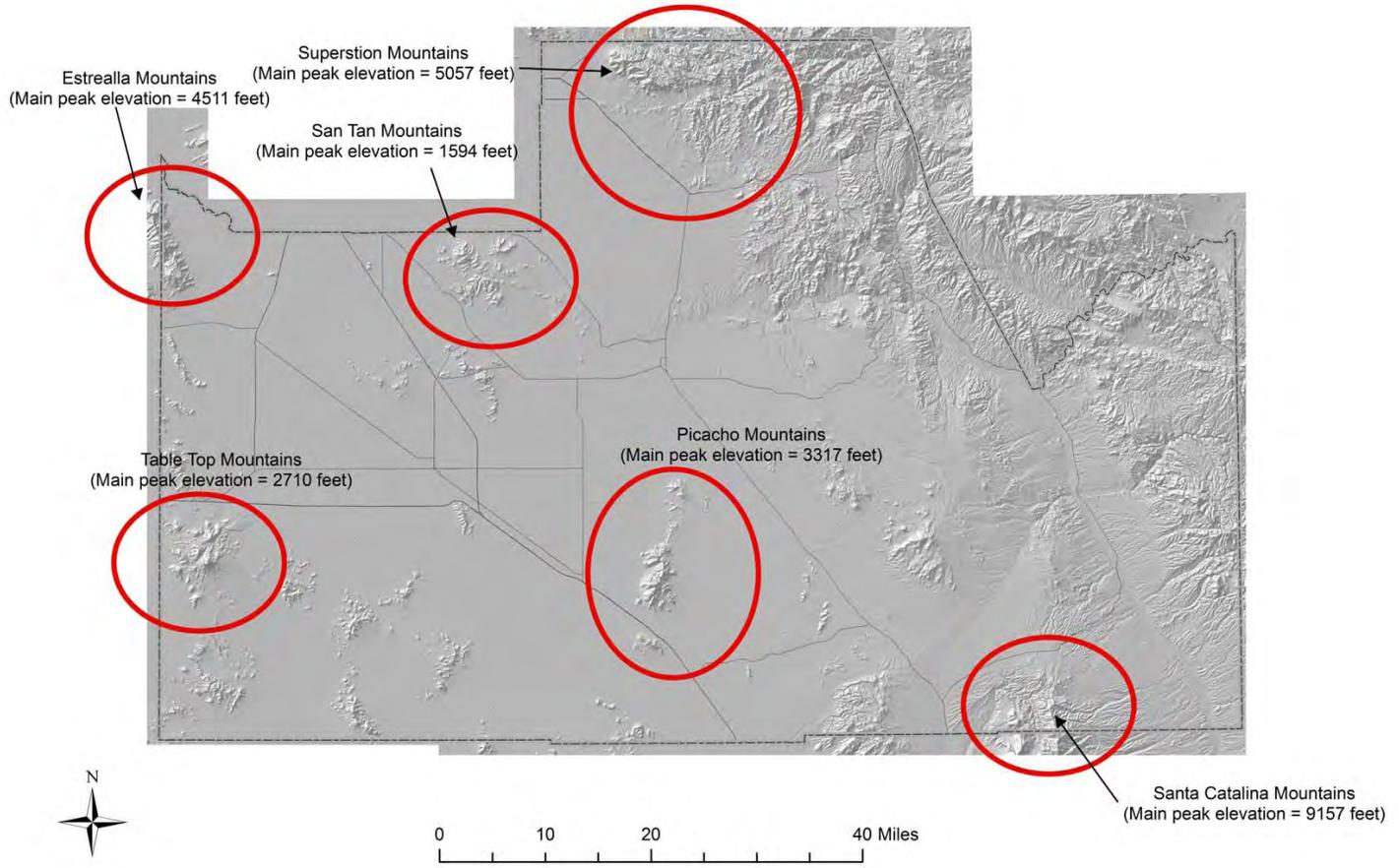
RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

7. Geography/topography (mountain ranges or other air basin boundaries)

Arizona can be divided into three regions geographically: the Colorado Plateau to the north, the Basin and Range Province of the south, and the Transition zone between them. Pinal County is located in the Basin and Range region which consists of largely broad, open-ended basins or valleys with gentle slopes. Isolated mountains rise like islands in the region. The Pinal County area has the San Tan Mountains and Superstition Mountains to the north; the Estrella Mountains provide a natural boundary between Pinal and Maricopa County to the northwest; the Santa Catalina Mountains, Tortolita Mountains, and Picacho Mountains to the south; the Table Top and Palo Verde Mountains on the western border of Pinal County; and the Galiuro Mountains to the southeast. The mountains provide complex mountain-valley wind patterns. See map 4 below for Pinal County's topography.

**Map 4. Pinal County Topography**

Pinal County Topography





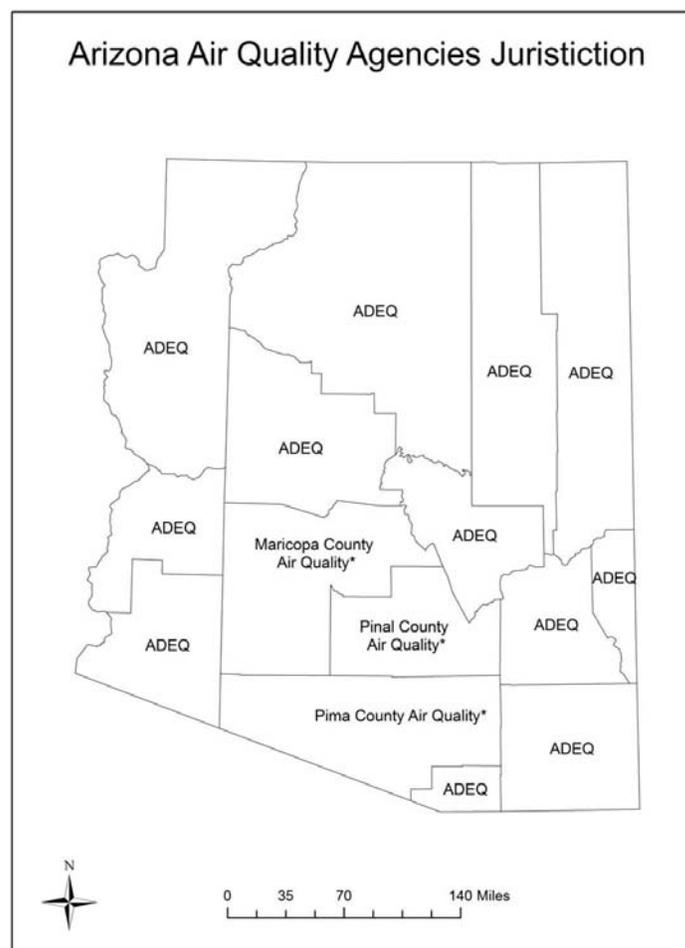
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8. Jurisdictional boundaries (e.g. counties, air districts, existing nonattainment areas, Reservations, metropolitan planning organizations (MPOs))

Pinal County is one of three delegated air quality agencies, in addition to the Arizona Department of Environmental Quality (ADEQ). See map 5 below for Arizona air quality agencies jurisdictions.

**Map 5. Arizona Air Quality Agencies Jurisdiction**



\* ADEQ has additional jurisdiction over metal smelting, petroleum refineries, coal fired electrical power plants, portland cement plants, air pollution by portable sources and air pollution by mobile sources.



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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

Pinal County is located between Phoenix (Maricopa County) and Tucson (Pima County). Pinal, Maricopa and Pima all regulate stationary sources within their borders. The Arizona Department of Environmental Quality (ADEQ) has jurisdiction throughout the remaining 12 counties in Arizona. ADEQ also has statewide jurisdiction over metal smelting operations, petroleum refineries, coal fired electrical power plants, Portland cement plants, air pollution by portable sources and air pollution by mobile sources.

The Gila River Indian Community (GRIC) is located within Pinal County and Maricopa Counties. GRIC has developed a Tribal Implementation Plan (TIP) and has issued permits within the community under the Tribal Authority Rules and the CAA.

The Pinal County Air Quality Control District (PCAQCD) was formed by the Pinal County Board of Supervisors (BOS) in 1967 to provide for the local protection and regulation of air quality. PCAQCD is an operating division of the Pinal County Development Services Department.

An industrial source permit program constitutes the cornerstone of the District's regulatory effort. The County has a SIP-approved PSD program, and a fully approved Title V permitting program.

These Pinal air permits provide a yardstick to measure individual source performance, and also provide each operator with a compliance analysis. The District maintains a computer modeling system to assess the anticipated impact of emissions. Field inspections are conducted to verify compliance with permit conditions, and insure that the permit is complete and appropriate for the operation of the facility. The District operates a county-wide monitoring network, which determines whether the local ambient air quality meets relevant standards.

The District provides open burning and dust activity permits, which help minimize local nuisances and possible health impacts. The District responds to citizen complaints, and attempts to resolve the matters on an informal basis. The District provides an enforcement effort to ensure compliance when all other measures prove inadequate. The District aims to provide the legal maximum of protections for public health and the environment, while minimizing the costs to the citizens of the county and the economic burdens on the regulated community.

Pinal County has been included in the Phoenix-Mesa Metropolitan Statistical Area, which constitutes a statistical rather than jurisdictional designation. The Phoenix-Mesa MSA covers about 14,500 square miles, including some 5,370 square miles in Pinal County.



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RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

9. Level of Control of Emissions Sources

Generally, ozone-precursor emission standards in Pinal County reflect those enforced throughout the state by ADEQ, and enforced by the local agencies. That reflects the combination of the mandate in A.R.S. §49-479 that local rules must be “at least as stringent” as those of ADEQ, and the opposite mandate in A.R.S. §49-112 that any “more stringent” rules must be justified by showing of a local “peculiar condition” coupled with a showing of either an imminent risk to health or an underlying legal mandate.

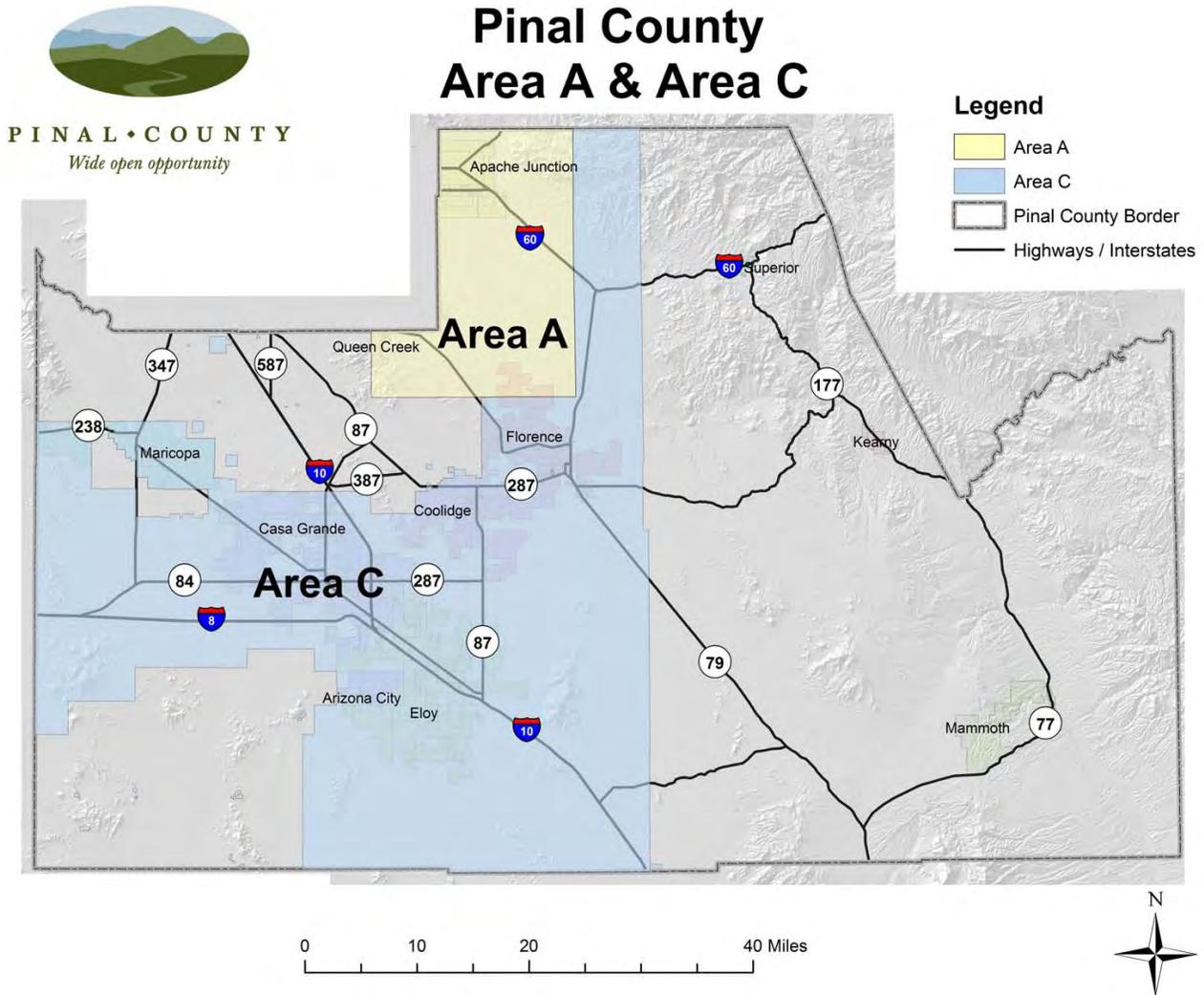
The Arizona legislature’s designation of “Area A” which includes northern Pinal County established a localized “regional strategy”, requiring vehicle emissions testing, travel reduction programs, stage II vapor recovery, alternative fleet vehicles, synchronized traffic control signals, flexible work hours for county employees, fireplace restrictions, no burn restrictions, and the coordination of planning and implementation plans by the Department of Transportation and PCAQCD.

In addition to “Area A” requirements, the Arizona legislature in SB1552 (2007) created “Area C” (see map 6) in Pinal County. “Area C” covers central and western Pinal County and requires clean burning gasoline be sold during the summer months. “Area C” was a proactive move by the Arizona legislature to ensure lower VOC emissions from an area in Pinal County which is currently in attainment for the existing (0.08 ppm) 8-hr ozone NAAQS.



RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

**Map 6. Pinal County “Area A” and “Area C”**





RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations (Continued)

Proposed new 8-hour ozone NAAQS (0.075 ppm) nonattainment area in Pinal County.

The Pinal County monitoring data shows only the Apache Junction and Queen Valley monitors don't attain the new 8-hr ozone NAAQS (0.075 ppm). The Pinal County ozone monitoring data elsewhere, emissions inventory, traffic and transport patterns show that the remainder of Pinal County doesn't have (nor contribute to) a problem with the new more stringent 8-hr ozone NAAQS (0.075 ppm). The current 8-hr ozone nonattainment area includes the Apache Junction monitor. A new slightly larger nonattainment area in Pinal County which includes the Queen Valley ozone monitor would be sufficient. Therefore Pinal County proposes that the current ozone nonattainment area be enlarged to include the Queen Valley ozone monitoring location.

In addition, the "Area A" and "Area C" requirements help reduce ozone precursor emissions in the current and proposed nonattainment areas of the County in addition to a large area of the county which is showing attainment via the monitoring data. Therefore Pinal County is already proactive in its efforts to reduce ozone formation.

Map 7 shows the Pinal County proposed new 8-hour ozone NAAQS nonattainment area.

Development  
Services

RE: New Ozone NAAQS (0.075ppm) NAA Boundary factors, supporting data and recommendations  
(Continued)

**Map 7. Proposed Pinal County Portion of Phoenix New 8-hr ozone NAAQS Nonattainment Area**

