



March 6, 2012

Andra Juniel
Air Assessment Section
Arizona Department of Environmental Quality
1110 W. Washington Street, Mail Code 3415-A
Phoenix, AZ 85007

Re: Comments on Exceptional Events Demonstrations in the Greater Phoenix Area

Dear Ms. Juniel:

Thank you for the opportunity to comment on the Arizona Department of Environmental Quality's (ADEQ) final exceptional events demonstrations for the Greater Phoenix area during July 3 through 5 and on July 7 and 8, 2011. The Arizona Chamber supports ADEQ's decision to pursue the events on these days as exceptional and agrees with the analysis in the final demonstrations. We believe that the determinations meet the requirements set forth in statute, EPA rules and the draft guidance that the EPA released in May 2011.

The Arizona Chamber represents members of the state's business community across all sectors of the economy and places great value on maintaining a healthy living environment for the people of Arizona while working to maintain a positive and reasonable regulatory climate. Thus we must express our disapproval of EPA's overly burdensome process required to make an exceptional event demonstration. Even when a community knows that a PM10 exceedance was caused by event that was truly exceptional, as Arizona did with our first July event that received global media attention, the criteria and procedures that must be applied are so rigorous that it is extremely difficult and expensive for local and state jurisdictions to comply. This is not the type of regulatory policy that is conducive to either economic growth or environmental improvements.

The Arizona Chamber believes that these determinations should be accepted by the EPA and encourages the EPA to reevaluate the exceptional events process. Please contact Rebecca Hudson at rhudson@azchamber.com or 602-248-9172 ext. 127 with any questions.



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Sincerely,

Glenn Hamer
President and CEO
Arizona Chamber of Commerce and Industry
Arizona Manufacturers Council

CC: Henry Darwin, Eric Massey, Representative Amanda Reeve



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