



STATE OF ARIZONA

JANICE K. BREWER
GOVERNOR

EXECUTIVE OFFICE

July 19, 2010

Jared Blumenfeld, Regional Administrator
Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

SUBJECT: Pinal County PM_{2.5} Area Designation Recommendation

Dear Mr. Blumenfeld:

This responds to your letter of May 10, 2010, transmitting a proposed nonattainment area boundary for the 24-hour National Ambient Air Quality Standard (NAAQS) for particulate matter 2.5 microns and smaller in size (PM_{2.5}) in Pinal County.

As I stated in my letter of March 23, 2010, and as documented in the technical analysis transmitted by Benjamin H. Grumbles, Director of the Arizona Department of Environmental Quality (ADEQ), there is overwhelming evidence that exceedances of the PM_{2.5} NAAQS in Pinal County are an artifact of high concentrations of PM₁₀. As a result, and because of the progress the State is making on PM₁₀ in Pinal County, the designation of a PM_{2.5} nonattainment area under the 24-hour NAAQS is unwarranted at this time. ADEQ continues to collaborate with Pinal County on a revision to the State Implementation Plan for PM₁₀. This Plan will result in attainment of both the PM₁₀ and PM_{2.5} NAAQS. Furthermore, the improvements in air quality concentrations of PM_{2.5} that I described in my earlier letter have continued. Therefore, the State continues to firmly believe a nonattainment designation for the annual PM_{2.5} NAAQS is not necessary to protect public health.

Nevertheless, if EPA insists on making a nonattainment designation for PM_{2.5}, Arizona has developed a counter-proposal to EPA's original boundary recommendation to include the following areas:

T4S, R3E – R4E
T5S, R3E – R4E (excluding sections 12, 13, 24, and 25)

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This area excludes Indian Country in the affected portion of Pinal County. Arizona notes that the recommended area does not completely surround the sovereign Indian Reservation but anticipates that EPA will review the Indian Communities for potential inclusion in the nonattainment areas and do so in a manner consistent with EPA's tribal consultation policy.

A map of the area is enclosed with this letter. The technical analysis supporting this recommendation will be transmitted by Mr. Grumbles under separate cover.

The State of Arizona is committed to continuing these positive trends for cleaner air through a range of tools and incentives, in collaboration with its citizens, local governments, State agencies, and EPA. If you have any questions, please contact Benjamin H. Grumbles at (602) 771-2203 or Henry R. Darwin, Deputy Director at (602) 771-2204.

Sincerely,

A handwritten signature in black ink that reads "Janice K. Brewer". The signature is written in a cursive, flowing style.

Janice K. Brewer
Governor

Enclosure

Pinal County PM_{2.5} Nonattainment Area Proposals: Arizona Preferred Alternative



Janice K. Brewer, Governor
Benjamin H. Grumbles, Director

