

Pinal County Air Quality Control District (PCAQCD)

Ozone Reasonably Available Control Technology (RACT)

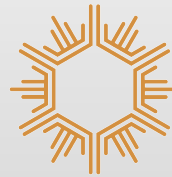
State Implementation Plan (SIP) Rulemaking

Chapter 5, Article 13 – Surface Coatings

Chapter 5, Article 20 – Gasoline Dispensing Facilities

BOS Meeting

March 19, 2025

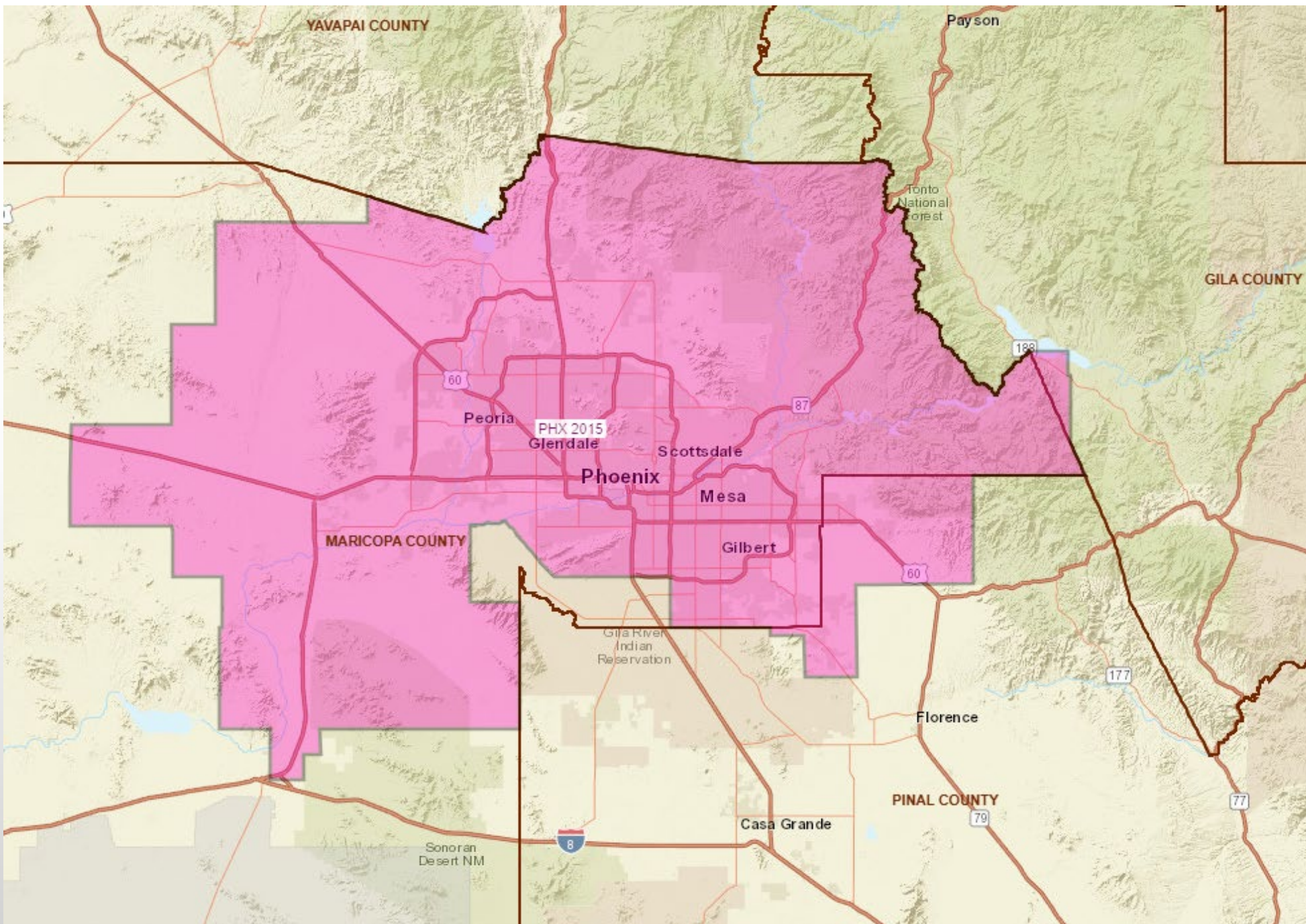


PINAL COUNTY

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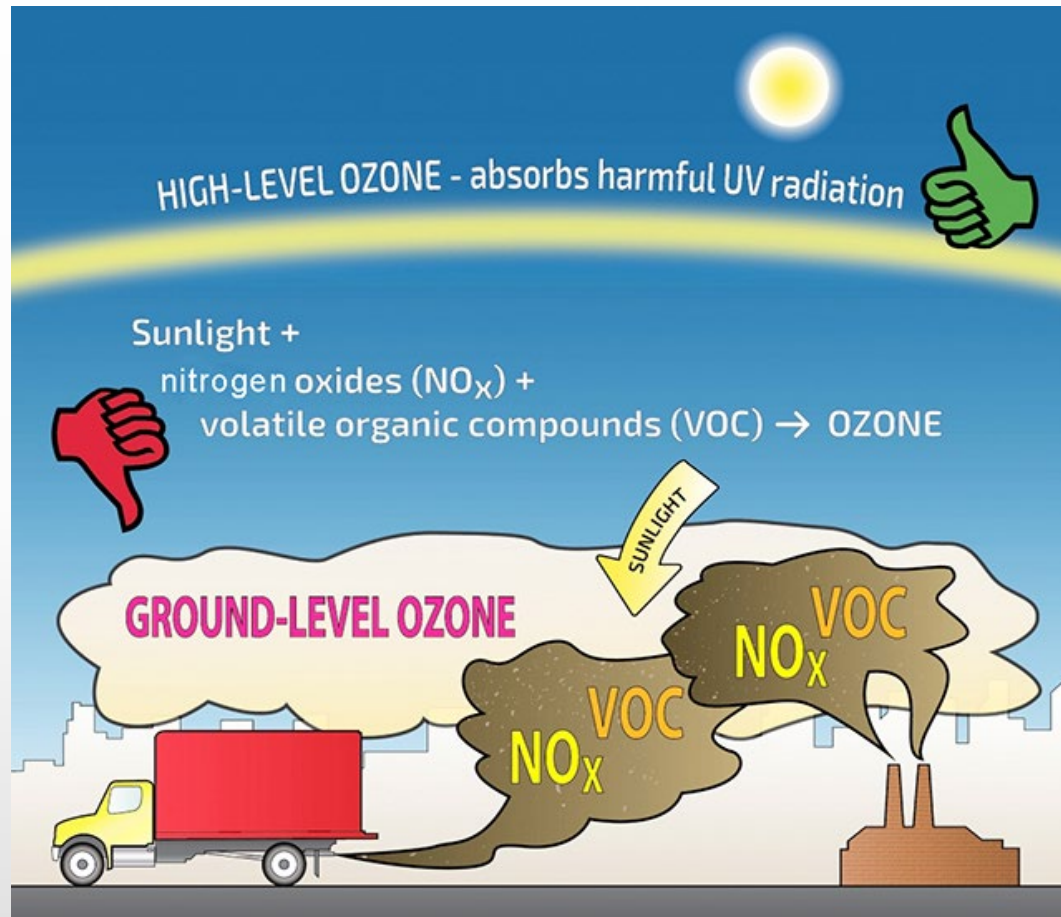
Why the Rulemaking?

- To demonstrate compliance with the National Ambient Air Quality Standard (NAAQS) for ozone.
- A portion of Pinal County is not meeting the ozone standard.

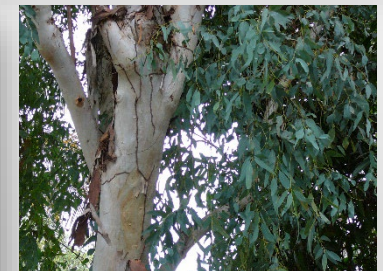


PHX 2015 Non Attainment Area Ozone (O3)

What is Ozone?



Ground level Ozone
harms human health

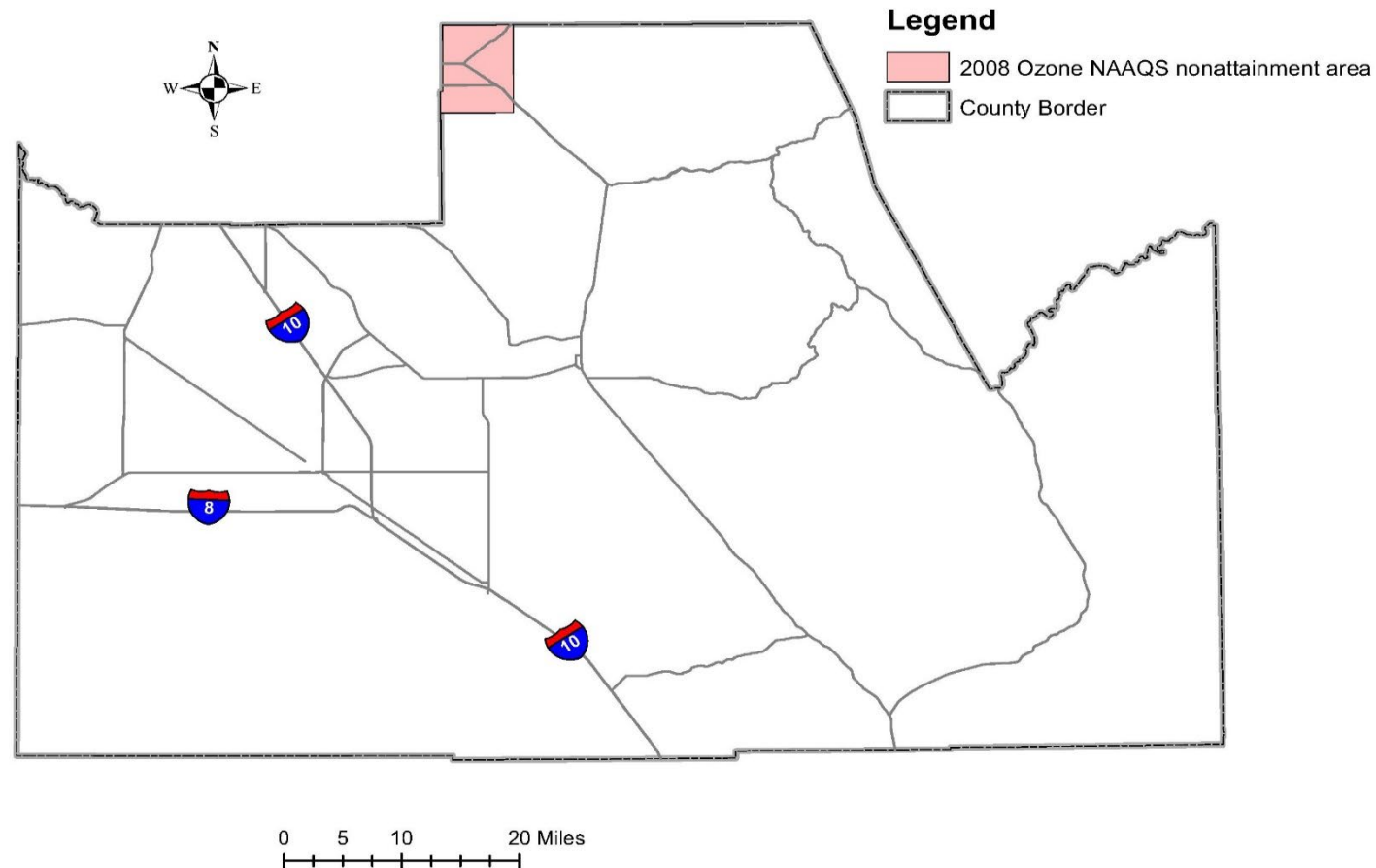


Why the Rulemaking?

- The Clean Air Act requires states and EPA to reduce ozone pollution to healthy levels.
- A portion of Pinal County is not meeting the Ozone standard and is deemed non attainment.
- In response to the ozone nonattainment classification Pinal County Air Quality Control District has undertaken several key actions:
 - Reasonable Available Control Technology (RACT) Analysis (VOC/NOx Sources)
 - Regulatory Amendments to Chapter 5, Articles 13 (Surface Coatings)
 - Regulatory Amendments to Article 20 (Gasoline Dispensing Facilities)
 - Negative Declaration Document (Analysis of sources with/without RACT)
 - BOS original adoption of each rule was made in August 2020
- Since the adoption of the 2008 RACT rules, Ozone Standard was again revised and in 2015 the Ozone non attainment area was expanded.

Where are these rules applicable?

Ozone Nonattainment Area - 2008 Ozone NAAQS

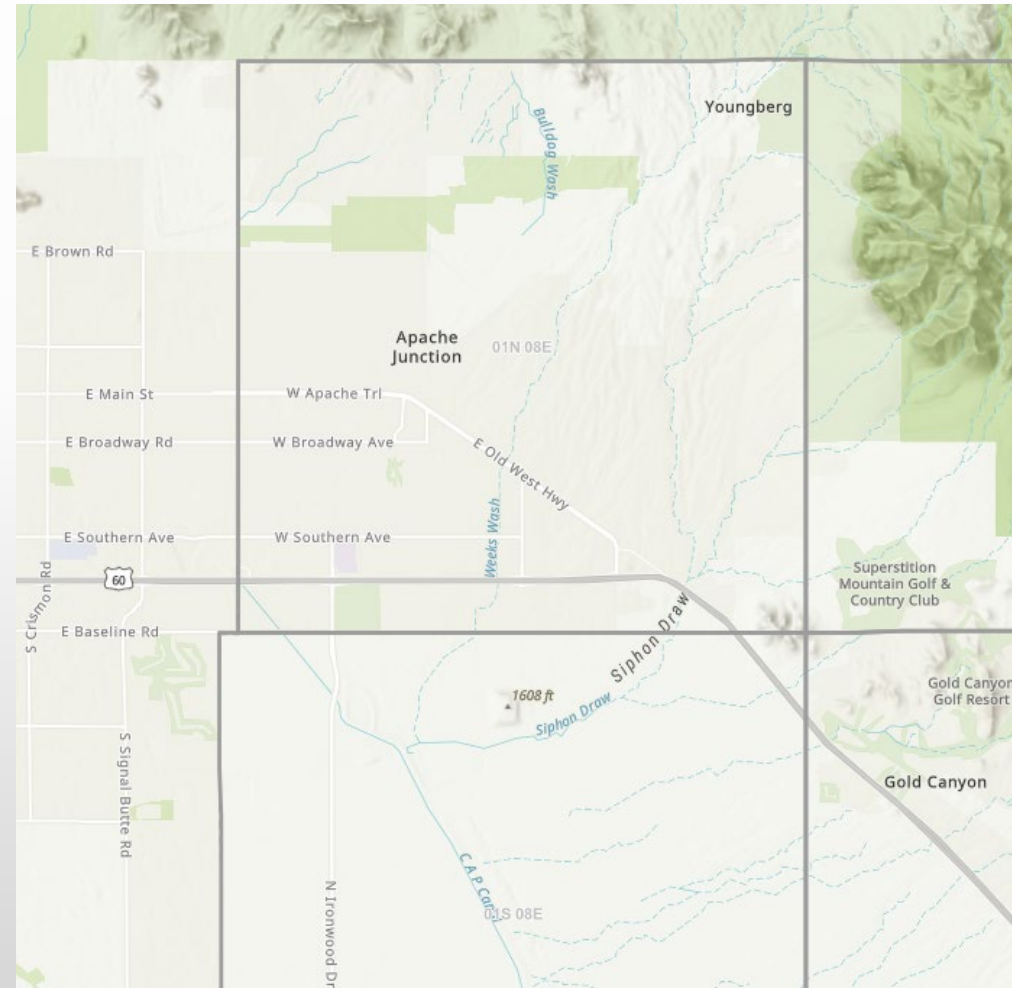
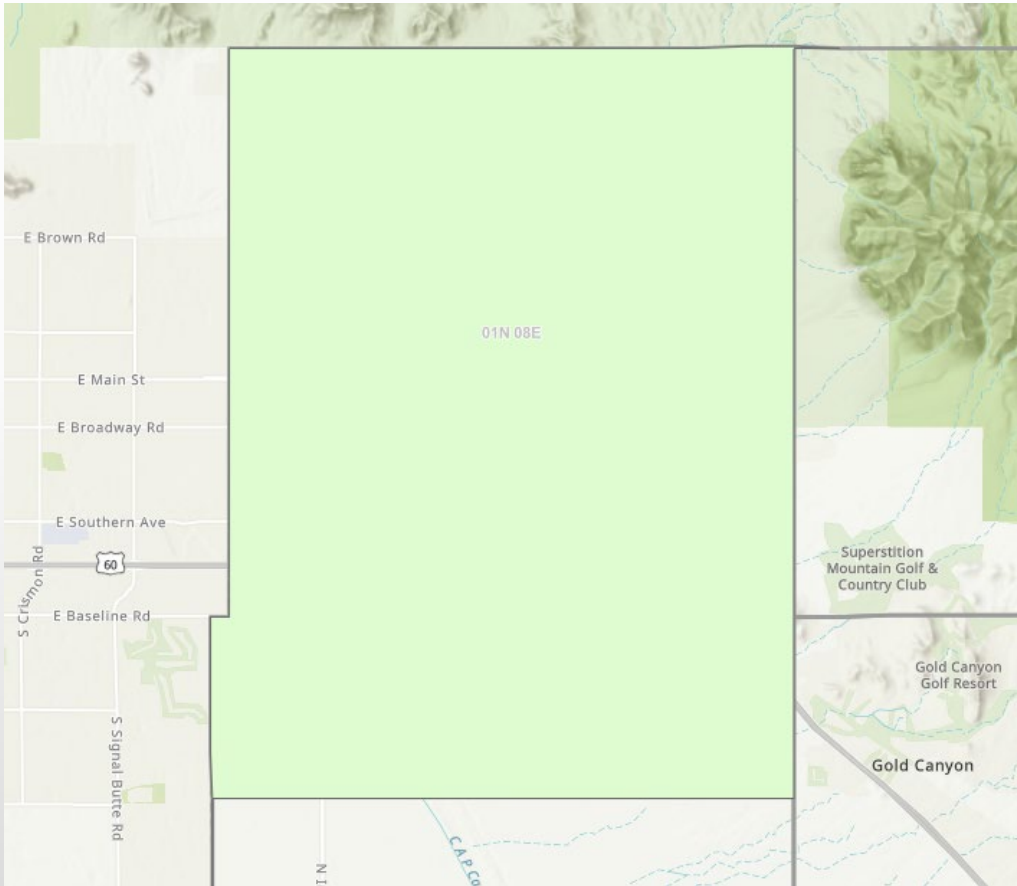


Where are these rules applicable?

Ozone Nonattainment Area – 2008 Ozone NAAQS



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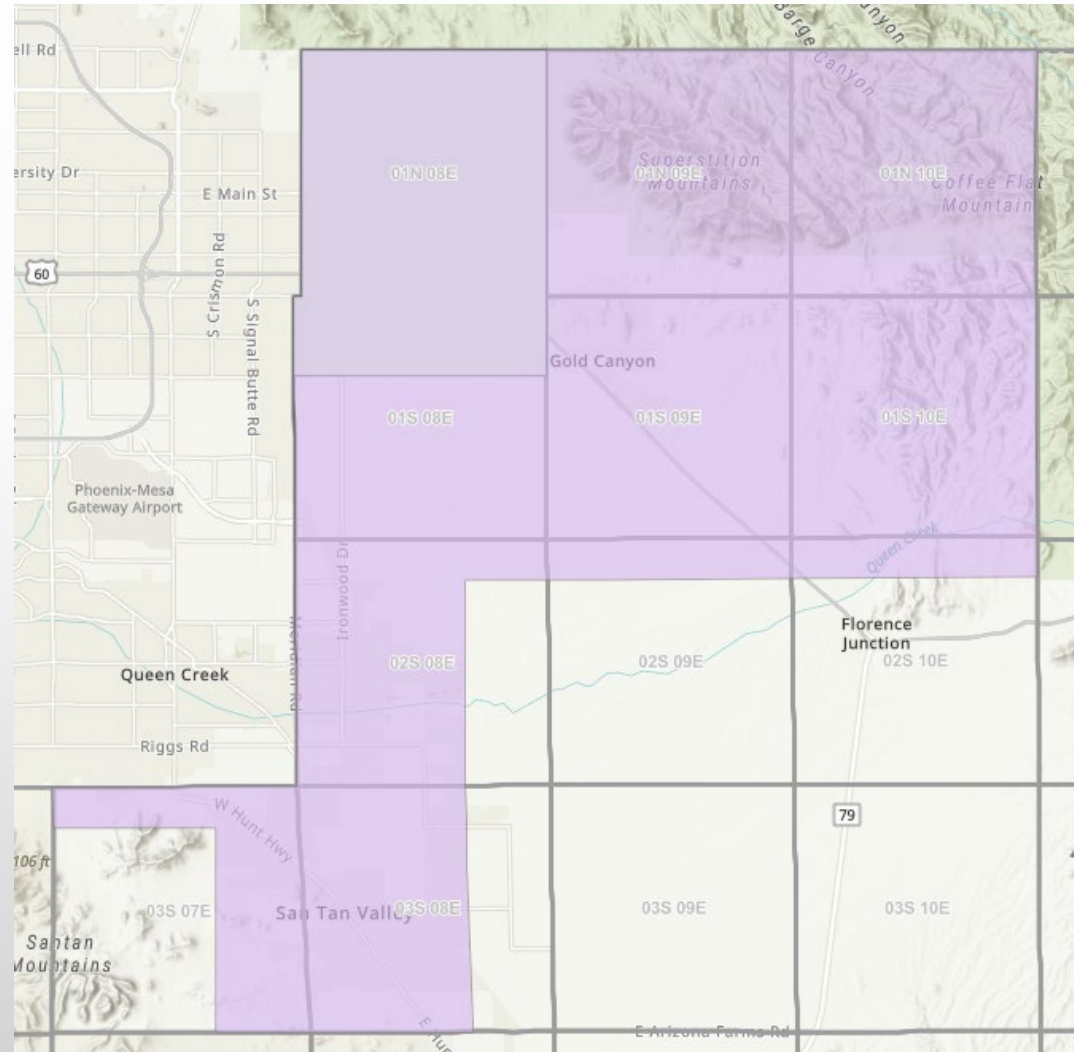


Where are these rules applicable?

Ozone Nonattainment Area – 2015 Ozone NAAQS



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Ozone RACT - Rule

Rule Improvement Recommendations

- EPA recommended improvements to the Gasoline Dispensing Rule
 - Amend methodology to search for VOC leaks: probe to be 'at the surface' during leak checks (existing rule has probe inlet at 1 inch above surface).
 - Typographical error to reference ASTM D323-06 instead of ASTM D323-06a.
 - Update exemption for normal farm operations into closer alignment with EPA model rule. (Tanks > 550 gallons subject to general housekeeping requirements, tanks <550 gallons are exempt from all requirements of the rule).
- EPA recommended improvements to the Surface Coating rule
 - Correct a single typographical error....section 300.1.ii from "...informed than an Emission Control System must be used..." to "...informed *that* ECS must be used..."

Rulemaking Timeline

- Public Notice began January 22, 2025 (Newspapers/Email/Notice Boards)
- Stakeholder meeting February 20, 2025
- Oral Proceeding Q/A - Public Hearing on February 24, 2025
No attendees or formal comments received
- Pinal County Board of Supervisors (BOS)
Public Hearing on March 19, 2025.
- After BOS Adoption – submittal to ADEQ for submittal to EPA.

Questions

Key topics covered in this Presentation

- 2008 Ozone Nonattainment Area
- 2015 Ozone Nonattainment Area
- Rule Applicability to Sources in Expanded NAA
- EPA Recommendations
- Rulemaking Timeline