



## MEMORANDUM FROM AIR QUALITY

Date: June 16, 2020

To: Pinal County Board of Supervisors

Re: Proposed SIP rulemaking (annual emissions inventory reporting rule)

From: Michael Sundblom

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The following is background information for the proposed rulemaking that is being presented to the Pinal County Board of Supervisors on July 1, 2020.

- The Environmental Protection Agency (EPA) revised the ozone National Ambient Air Quality Standards (NAAQS) in 2015 (from 0.075 parts per million (ppm) to 0.070 ppm).
- The original ozone nonattainment area which encompassed the Phoenix metropolitan area and a small portion of Pinal County (Apache Junction) was expanded for the 2015 ozone NAAQS eastward into Queen Valley and also southward into San Tan Valley. The nonattainment area classification is marginal (lowest level of nonattainment area classifications).
- On December 6, 2018, EPA published a final implementation rule for the 2015 ozone NAAQS. One of the requirements for marginal nonattainment areas is related to an emissions statement (Clean Air Act Section 182(a)(3)(B)).
  - The State is required to submit a revision to the Arizona State Implementation Plan (SIP) which requires the owner or operator of each stationary source of nitrogen oxides (NO<sub>x</sub>) or volatile organic compounds (VOC) in the ozone nonattainment area provide the State (or local air quality agency) with a statement showing the actual emissions of NO<sub>x</sub> or VOC from that source.
- The EPA final implementation rule requires submission of emissions statement regulations within two years from the effective date of designation to a nonattainment area (August 3, 2020). A subsequent review by EPA on the emissions statement rules of the various air quality agencies in Arizona found the existing emissions statement rules, including Pinal County's (§3-1-103 – Annual Emissions Inventory Questionnaire) were out of date and not fully aligned with the CAA Section 182(a)(3)(B) requirements. Thus necessitating this rulemaking.
- The proposed rulemaking started on March 18<sup>th</sup> with the Combined Notice of Proposed Rulemaking and Oral Proceeding posted on the Pinal County Air Quality website and also posted in County buildings and published in local newspapers. A stakeholder meeting was held virtually on May 5<sup>th</sup> with several people in attendance. The Control Officer Oral Proceeding was held virtually on May 12<sup>th</sup> with several people in attendance. No formal comments were submitted by the end of the public comment period (Close of Business on May 12<sup>th</sup>).

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