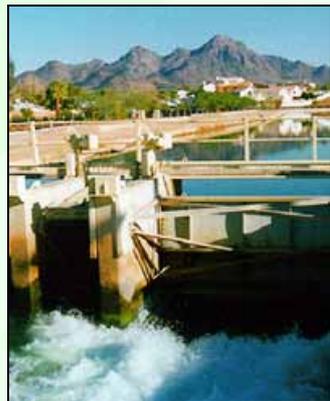




Withdrawal of the MAG Five Percent Plan for PM-10 and EPA Clean Data Policy

MAG Air Quality Technical Advisory Committee

February 24, 2011

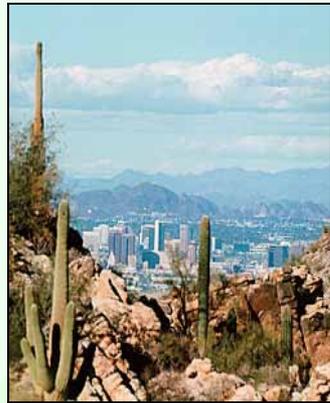


Finding of Failure to Submit

- n **Plan withdrawn by ADEQ on January 25, 2011**
- n **EPA Finding of Failure to Submit published in Federal Register on February 14, 2011 and effective on that date**
- n **Clean Air Act sanctions would be imposed if a new complete plan is not submitted within**
 - l 18 months from the finding of failure to submit (August 14, 2012)
 - n Tighter controls on major industries (2:1 offsets in emissions)
 - l 24 months from the finding of failure to submit (February 14, 2013)
 - n Loss of federal highway funds - \$1.7B at risk in FY 2011-2015 MAG Transportation Improvement Program (TIP)
 - n Federal implementation plan imposed
- n **Imposition of highway sanctions may trigger a conformity lapse**
 - l Major projects in \$7.4B TIP could not proceed

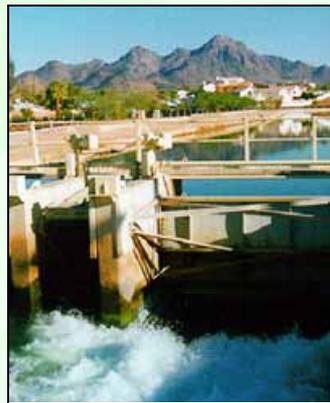


Submittal of a New Five Percent Plan for PM-10



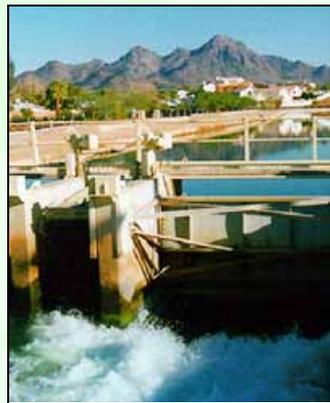
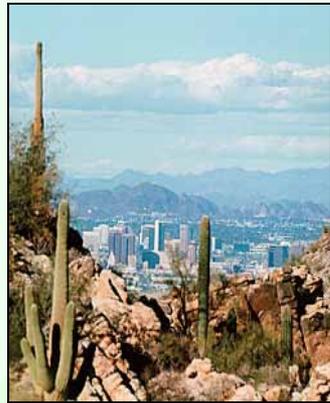
n **Submittal of a new plan and a completeness determination by EPA will stop the eighteen month and twenty-four month sanctions clocks.**

n **EPA approval of the plan will stop the imposition of a federal implementation plan.**



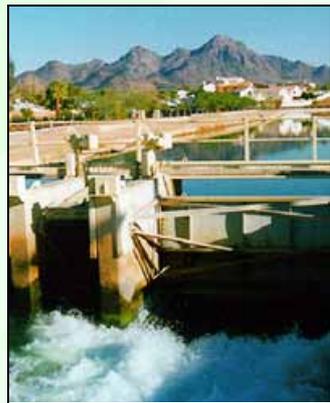
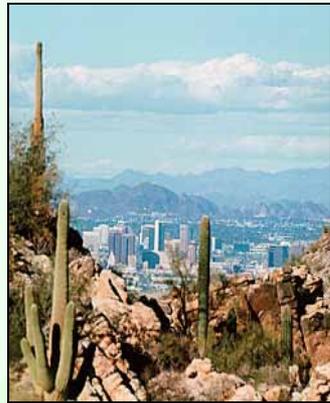
n **New plan would need to be submitted by January 2012. EPA completeness determination may take six months - needed by August 14, 2012.**

n **EPA plan approval action needed by February 14, 2013.**



New Five Percent Plan for PM-10

- n **Focus needs to be on high winds**
 - l No violations during stagnant conditions since the prior Five Percent Plan was submitted in December 2007.
- n **Revised 2008 emissions inventory needed**
 - l Major downturn in economy since 2005 has changed mix of sources
 - l Maricopa County 2008 emissions inventory is being revised
 - n MAG provided vacant land documentation to EPA in November 2010 and Maricopa County (under review)
 - n MAG revised the paved road emissions based on new EPA AP-42 equation in January 2011
 - n MAG prepared a draft of the windblown dust emissions in February 2011 (under review)
 - n MAG is updating the onroad mobile source emissions using the new EPA MOVES model



New Five Percent Plan for PM-10

- n **Maricopa County 2008 emissions inventory is being revised (cont.)**
 - n ADEQ to provide MAG with GIS data from agriculture for comparison with MAG land use data
 - n Maricopa County working on rule effectiveness
- n **Update Best Available Control Measure Analysis**
- n **May need to add more measures to reduce emissions by 5 percent per year until attainment, as measured at the monitors**
- n **Will need to revise modeling in the Plan**
- n **Will need to address agricultural BACM and enforcement issues**
- n **Will need 3 years of clean data at all PM-10 monitors for attainment**



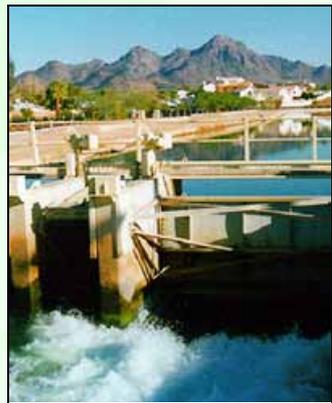
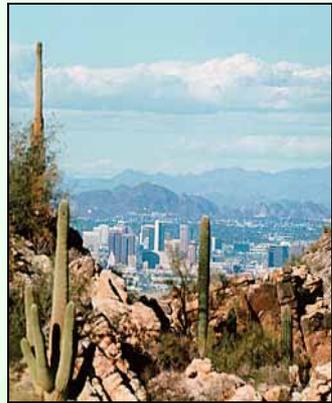
EPA Clean Data Policy – Best Case Scenario for the Region

- n **Region would need 3 years of clean data at monitors (2009, 2010, 2011)**

- n **EPA could then issue a finding of attainment**

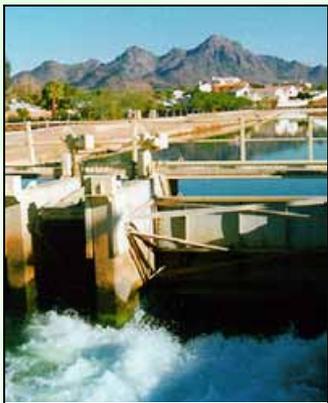
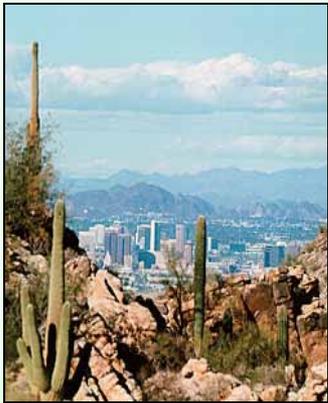
- n **Clean Air Act requirements would be suspended for reasonable further progress, attainment demonstration, and contingency measures AS LONG AS THE AREA REMAINS IN ATTAINMENT**

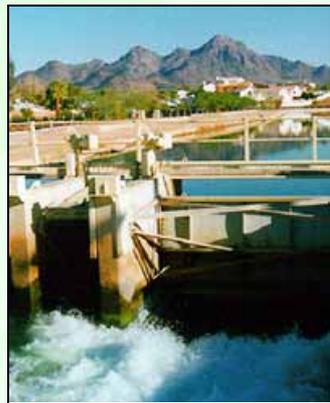
- n **A redesignation request to attainment status and maintenance plan could then be pursued**



Redesignation Request and Maintenance Plan Criteria

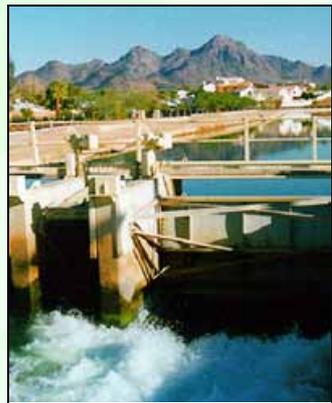
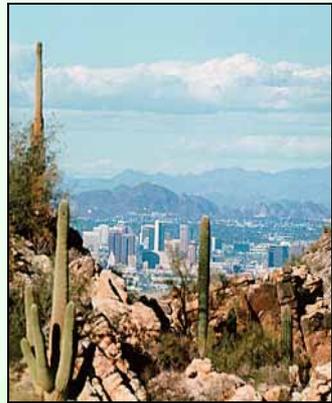
- n EPA has determined that the area has attained the PM-10 standard.
- n The applicable implementation plan has been fully approved by EPA under the Clean Air Act section 110(k).
- n EPA has determined that the improvement in air quality is due to permanent and enforceable reductions in emissions.
- n The State has met all applicable requirements for State Implementation Plans and Nonattainment Areas under Clean Air Act section 110 and Part D.
- n EPA must approve a maintenance plan, including a contingency plan, for the area. The plan must demonstrate maintenance of the PM-10 standard for a period of at least 10 years following redesignation to attainment by EPA.





Prevention of Windblown Exceedances is Critical

- n **EPA likes the Clark County approach. It has been successful in attaining and maintaining the PM-10 standard**
- n **Clark County Natural Events Action Plan for High Wind Conditions**
 - | Watch the monitor readings
 - | Watch for when high winds are forecasted
 - | Notify facilities that high winds are coming and inspectors will be coming out
 - | Send inspectors out to monitors
 - | Fan out from monitors



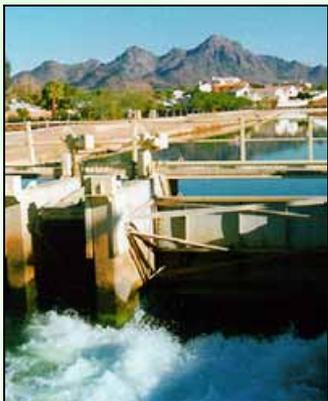
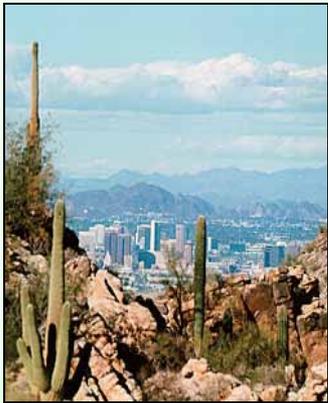
Prevention of Windblown Exceedances is Critical

- n **Leadership from MAG is critical. Joint efforts with Maricopa County are needed.**
- n **MAG is asking its members (cities and towns) for their ideas on what they can do to prevent windblown exceedances.**
- n **MAG draft ideas**
 - | Cities/towns could have customized High Wind Action Plans
 - | ADEQ could notify the cities/towns when high winds are forecasted (three day lead time)
 - | Cities/towns could watch real time monitor readings
 - | Cities/towns could be the "eyes and ears" for Maricopa County and ADEQ inspectors
 - | Review potential sources under the control of cities/towns
 - | Check city/town operations that are dust-generating to ensure that dust control measures are in place
 - | Distribute monitor maps to city/town contractors and other contractors that come in for local permits

Prevention of Windblown Exceedances is Critical

n **MAG draft ideas (cont.)**

- | Cities/towns check sources around monitors located in their jurisdiction; notify the County and ADEQ
- | MAG video on High Wind Awareness – what citizens should not do on high wind days





For More Information

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