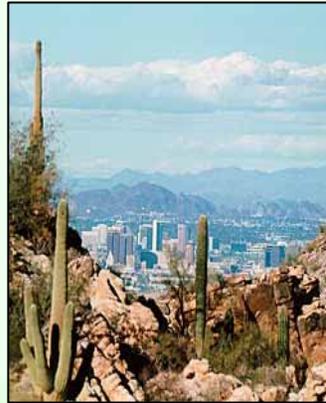


# Additional PM-10 Measures Recommended by Maricopa County and Letter from EPA

## Management Committee

May 9, 2007





## Additional PM-10 Measures Recommended by Maricopa County

- **County memorandum presented at the MAG Regional Council meeting on March 28, 2007**
  - Recommended 5 additional measures for the Suggested List of Measures to Reduce PM-10
  - County alone cannot address the nonpermitted sources
    - Unpaved parking, unpaved staging areas, unpaved roads, vacant lots and open areas
  - All cities are needed to proactively address the nonpermitted sources





## MAG Regional Council Action on March 28, 2007



- **Approved the Suggested List of Measures to Reduce PM-10**
  - 42 measures, including one measure and one modification recommended by the County
    - Provide the County authority to assess liens to recover dust control costs on vacant lots
    - Add "state" as an implementing entity on another measure for vacant lots
- **Directed the MAG Air Quality TAC to consider the remaining County measures at their April meeting**





## Air Quality TAC Recommendation on April 26, 2007

- **2 measures from the County should be sent back to the MAG consultant for additional information:**
  - Reduce trackout length to 25 feet before immediate cleanup is required at construction sites
  - No visible emissions at the property line
- **2 measures from the County should not be considered further:**
  - Just in time grading for construction
  - Modeling cumulative impacts for permitted sources of PM-10



## EPA Letter - April 20, 2007

- **Concerns about the PM-10 Plan**
  - Plan implementation relies too heavily on Maricopa County, not enough on local cities and towns
    - Especially for nonpermitted sources
      - Unpaved roads and driveways, unpaved parking lots, vacant disturbed lots
  - Entities need to have adequate resources at the outset of the plan's implementation or **EPA may not be able to approve the plan**





## EPA Letter - April 20, 2007

- **Concerns about the PM-10 Plan (continued)**
  - Control measures are being eliminated too early in the planning process
    - Process should be revisited
  - At the Air Quality TAC meeting on April 26, Colleen McKaughan, EPA, said, **"I'm going to say this plan can't be approved. It's just not doable."**



# EPA Letter - April 20, 2007

## ■ Other Concerns

- Violations of the PM-10 standard outside the Maricopa nonattainment area
  - If exceedances at the Buckeye monitor are not reduced, EPA may expand the Maricopa nonattainment area
  - If exceedances at the Pinal County monitors are not reduced, EPA may designate western Pinal County as a nonattainment area
- Eight-Hour Ozone Plan
  - Additional measures should be considered since monitored values are close to the standard





# Five Percent Plan for PM-10: What's at Risk?

- **If EPA disapproves the plan**
  - Sanctions will be imposed
    - Major industries impacted by 2:1 offsets
    - Withholding of federal highway funds
      - \$1.1 billion
    - Conformity lapse occurs on the day the highway sanctions are imposed
      - \$6.4 billion – FY 2007-2011 TIP
    - Federal implementation plan imposed

# For more information

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