



PINAL COUNTY  
wide open opportunity

August 19, 2015

Meredith Kurpius  
Air Division, US EPA  
75 Hawthorne St., AIR-7  
San Francisco, CA 94105

Dear Ms. Kurpius,

Pinal County Air Quality Control District (PCAQCD) is requesting approval from U.S. EPA to move our air monitoring station known as Cowtown Road (AQS # 04-021-3013), based on 40 CFR Part 58.14 (c)(6): *A SLAMS monitor not eligible for removal under any of the criteria in paragraphs (c)(1) through (c)(5) of this section may be moved to a nearby location with the same scale of representation if logistical problems beyond the State's control make it impossible to continue operation at its current site.*

As background, during the fall of 2013 Pinal County was notified by the landowners of the Cowtown Road site that they would not allow Pinal County to continue its use of the property. Pinal County negotiated a two year extension on the lease so that the Cowtown Road site could be relocated following EPA guidelines. The lease agreement allows Pinal County to use the Cowtown Road site property through January 20, 2016. The current Cowtown Road monitoring equipment consists of one continuous Federal Equivalent Method (FEM) PM<sub>10</sub> analyzer currently designated as a Special Purpose Monitor (SPM), two filter-based Federal Reference Method (FRM) PM<sub>2.5</sub> samplers currently designated as a State or Local Air Monitoring Station (SLAMS), a meteorology system, and visual monitoring equipment.

EPA Region IX provided Pinal County with guidance regarding relocation of the Cowtown Road monitors. This guidance suggested for both PM<sub>10</sub> and PM<sub>2.5</sub> an appropriate nearby location for the replacement site would include areas within the West Pinal Moderate PM<sub>10</sub> and West Central PM<sub>2.5</sub> nonattainment areas. EPA Region IX also described the spatial scale of representativeness in terms of the physical dimensions of an air parcel throughout which actual pollutant concentrations are reasonably similar. This homogeneity refers to the PM concentrations, as well as the land use and land surface characteristics. Therefore, the replacement site must be a middle scale site that measures similar concentrations from similar sources to those measured at the existing Cowtown Road site.

Selection of potential evaluation sites began in early 2014. The site selection process was driven by several primary factors including: 1) guidance from the Pinal County Board of Supervisors to locate the future site on publicly owned property thereby ensuring longevity of the site, 2) EPA relocation guidance suggesting locations of similar concentration, scale of representation, land use and emission characteristics, and 3) general site access, security and infrastructure.

The site selection process resulted in two potential evaluation sites, the Hidden Valley site located approximately seven kilometers west of the community of Stanfield on Pinal County property, and the White and Parker site located approximately six kilometers southeast of the City of Maricopa on city owned property. Both sites are located within the boundaries of the West Pinal PM<sub>10</sub> Non-attainment Area and the West Central PM<sub>2.5</sub> Nonattainment Area.

AIR QUALITY CONTROL DISTRICT

On June 13, 2014 Pinal County Air Quality Control began a year-long project to collect ambient air data at the potential replacement sites. Ambient monitoring was concluded on June 14, 2015. Each site in the evaluation study, including the Cowtown Site, was equipped with portable PM<sub>10</sub> and PM<sub>2.5</sub> monitors.

In order to compare each study site to the existing site at Cowtown, Pinal County developed a list of evaluation criteria which included comparability of measurement, representation of population, longevity of the site, scale of representation, area land use, area emissions, and cost of developing the site. These criteria were developed using guidance provided by EPA Region IX and by Stakeholders. The evaluation provides both qualitative and quantitative assessments of each site. Of particular focus in the review was the comparability of measurements to the NAAQS for both PM<sub>10</sub> and PM<sub>2.5</sub>.

The attached document entitled, "Pinal County Air Quality Control: Evaluation of Cowtown Road Replacement Sites Final Report August 2015" provides a basis for logistical issues that necessitate moving the Cowtown site as well as detailed analysis of both evaluation sites and comparison of site characteristics, scale of representation, emissions, land use, population, and measured particulate concentrations.

In summary, the report concludes that the Hidden Valley is the most similar site and appropriate to replace PM<sub>10</sub> and PM<sub>2.5</sub> monitoring at Cowtown. Further, the report concludes that the Hidden Valley site meets the requirements of a unique middle scale site and, therefore, is not subject to the annual PM<sub>2.5</sub> NAAQS. These conclusions were based upon the evaluation criteria described in the report with a focus on comparability of PM<sub>10</sub> and PM<sub>2.5</sub> to the relevant NAAQS.

With this submittal PCAQCD requests EPA's approval to relocate the Cowtown Road site, including PM<sub>10</sub> FEM and PM<sub>2.5</sub> FRM monitors, to Hidden Valley as described in 40CFR Part 58.14 (c)(6).

Please contact me at (520) 866-6915 if you have questions regarding this request.

Regards,



Mike Sundblom  
Director  
Pinal County Air Quality Control District

cc via email: Mr. Pete Rios, Pinal County Board of Supervisor, District 1  
Ms. Cheryl Chase, Pinal County Board of Supervisor, District 2  
Mr. Steve Miller, Pinal County Board of Supervisor, District 3  
Mr. Anthony Smith, Pinal County Board of Supervisor, District 4  
Mr. Todd House, Pinal County Board of Supervisor, District 5  
Mr. Greg Stanley, County Manager, Pinal County  
Colleen McKaughan, Associate Director Air Division, EPA Region 9  
Eric Massey, Air Quality Division Director, ADEQ