



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) PM₁₀ analyzer currently designated as a Special Purpose Monitor (SPM), two filter-based Federal Reference Method (FRM) PM_{2.5} 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 PM₁₀ and PM_{2.5} an appropriate nearby location for the replacement site would include areas within the West Pinal Moderate PM₁₀ and West Central PM_{2.5} 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 PM₁₀ Non-attainment Area and the West Central PM_{2.5} Nonattainment Area.

AIR QUALITY CONTROL DISTRICT

