

## Pinal County Air Quality

### PM10 Stakeholders Meetings

9/14/07

#### CONSTRUCTION GROUP - 9:30 am

Attendees: Pinal County Air Quality Staff, builders, contractors and rock products

After a brief introduction of the meeting attendees, Mr. Don Gabrielson, Director of Pinal County Air Quality Control District, responded to a question from Mr. Spencer Kamps, representing the Home Builders Association and the construction group, about use of the inventory spreadsheet the group has discussed and developed in the meetings from previous weeks. That information was not developed to present an inventory to EPA, but rather to provide a foundation for a consensus dust management program in Pinal County.

Our current rule requirements as they affect construction, as well as Maricopa County's rule 310, were discussed.

Mr. Kamps agreed that something needs to be done before EPA mandates something. He discussed the current Maricopa County dust rule, and indicated that it is costing a lot of money, but not solving the problem. He would like to see the permit in Pinal County as a flexible document, with different options for compliance measures. The various metrics to assess success of the plan measures would be the registration program already in place, trackout control devices on designated exits, dust logs specific to each generating activity and signs.

Concern was raised over the relative precedence of the permit commitments vs. rule requirements.

Representatives of Pulte Homes as well as others agreed that they are on board with the existing rule, but Mr. Kamps indicated that the 0.1 acre size from Article 3 is very low and they would like that changed to 5 acres or more.

Also, Mr. Kamps indicated they do not want the definition of public road from Rule 310, they like better the definition from Clark County's rules. Our rule designates every road as a public road. Clark County makes a distinction regarding internal vs external trackout.

All homebuilders will go through the training required by Maricopa County.

A representative of Meritage Homes indicated they would like to keep flexibility, by having the list of control measures in the dust application instead of rule, in order to avoid rule revisions. If they are listed on the application, that is a document that will be

available in the field.

In Maricopa County the rule establishes what you have to do or you are in violation, and that's difficult to take to the field. Better results in the field if the plan is in permit. Several voiced support for having the permit constituting the applicable standard with respect to a given site, rather than the rules.

The homebuilders discussed the balancing of sufficient moisture to prevent dust, but avoiding compaction when the soil turns to mud.

Mr. Walch of PCAQCD discussed EPA Method 22 as a possible system to measure opacity from moving equipment. It's a method that simply looks at dust or no dust. This method is being used in Washoe County, Nevada and New Mexico.

The homebuilders asked whether this method could be confusing for enforcement if there is more than 1 permitted contractor or subcontractor company on site. Also they indicated there would need to be education or training for smaller contractors on how to do this method.

Mr. Kamps indicated that he would like his group get together and discuss a new standard, look at Methods 22 and 9 and compare them.

Mr. Walch also discussed the penetrometer as possible tool.

Mr. Gabrielson closed the meeting by summarizing the action items: the home builders will take a look at Method 22 and also come up with a list of options to put in the application as control measures, and will also look at stabilization. They will also coordinate with Pinal County to set up a site to conduct a "test drive" demonstration of Method 22.

#### ROADS GROUP - 11:00 am

Attendees: Pinal County Air Quality Staff, ADOT, City of Maricopa, City of Apache Junction, City of Casa Grande, Town of Florence.

After a brief introduction of the meeting attendees, Mr. Don Gabrielson asked Mr. Billingsley from the City of Maricopa to start the discussions.

Mr. Billingsley, indicated that the City of Maricopa has been paving more roads than anybody, but the monitoring data shows the air quality is getting worse. He asked how we account for the increase in traffic, and also, the Cowtown monitor, which shows a problem even if it's been disqualified for this study.

A discussion followed on how to quantify the benefits from paving roads. Pinal County staff indicated that there are emission factors for unpaved roads, as well as road counters, and lists of roads. ADOT suggested that we look at studies done in rural counties in

Iowa. Midwestern Research Industries (MRI) has conducted studies on that.

The representative from Casa Grande indicated that unpaved roads in Iowa are surfaced with aggregate, not dirt like in Pinal County. In Clark County they have clay roads, so we could look at what they are doing. The best solution for dirt roads is chip sealing, because dust palliatives work on aggregate but they are not very efficient on dirt roads.

Mr. Billingley indicated that chip seals only work for certain weights and loads, so it is hard to use for heavier equipment. The City of Maricopa doesn't like to use chip sealing because they can't meet the county's specs. So chip sealing roads is not the best solution either. Cities need a joint contract with the County, because they don't have their own crew or equipment, so they can put together a chip sealing program.

Mr. Gabrielson indicated that the FIP in Maricopa County requires paving to roads with 150 ADT or more, and EPA wants the same treatment in Apache Junction, and the same will potentially apply to the rest of Pinal County if we get designated nonattainment.

A representative from Casa Grande indicated that there are a lot of problems with wildcat developments. Cities require paving to all developments approved by cities but there are still problems with wildcatting. There need to be standards to limit speed, manage traffic or fine people not authorized to use roads. A brief discussion addressed managing traffic to avoid dirt roads. Another idea would be abandoning rights-of-way, but that presents problems from a traffic planning perspective.

Representatives from Maricopa suggested that the general plan for each city should include a section on natural resources or air quality, including issues like phased development. Also they indicated that if air quality is such a big problem, the County and cities should have air quality discussions during the general plan development.

A representative from ADOT indicated that CARB has sample language to put into the general plan for development and air quality issues.

For a more immediate solution, Mr. Gabrielson discussed the need for an inventory of infrastructure. Maricopa representatives indicate this inventory is done in an annual basis. Mr. Joe Briar (sp?) of GIS Consulting has the list of all the roads for the whole county, and this company conducts traffic counts too.

The problem is that not all communities report to this inventory because there is a threshold of ADT. The GIS Consulting inventory also includes aerial photos, so unpaved roads also show up.

Ms. Chenausky from ADOT will get us a contact with Joe Briar's (sp) consultants to see if we could do something similar, with our own budget, but it'll be hard to separate public or private roads.

Mr. Billingsley suggested each city give PCAQCD the mileage of unpaved roads in their

area. They also have traffic counts they can share with us, but only for paved roads. Numbers for unpaved roads would have to be extrapolated.

There was a discussion on the alternatives to paving if there is not enough of a budget. These alternatives are: abandoning right of way, enforcing speed limits, or requesting nonattainment designation so that we can get CMAQ money from ADOT.

It was also discussed that there have to be other options because cities don't have the money to pave all the roads. Wildcatting is a big problem because they are creating unpaved roads and more traffic. It was suggested that all the main roads are paved and the ones created by wildcatting be closed off, or speed enforced due to air quality reasons.

Mr. Gabrielson proposed an road improvement district, where everybody gets taxed in order to fill the funding gap for paving dirt roads.

Mr. Billingsley discussed the RSRAM study conducted by the County and cities. RSRAM designates routes of regional significance. Some of these main routes between cities are unpaved, and still there is no funding to pave them. Mr. Billingsley suggested maybe we can do a ½ cent tax for transportation as they did in Maricopa County. Maybe we can use part of that tax for solving air quality issues.

Mr. Billingsley asked whether air quality could come up with a list of which one of the dirt roads are the worst so that municipalities can focus on those.

Mr. Gabrielson asked the group what they would be willing to commit to, at least what is the 5 year vision.

Representatives of Maricopa suggested a meeting of all the Public Works directors where Mr. Gabrielson could give a presentation. The meeting could include other people that will give the political backing needed, because the elected officials should be educated in this process. The BOS should be aware and committed to the air quality issues.

Mr. Billingsley indicated that it would be beneficial if he could give presentation on behalf of air quality to the Maricopa city council in the same fashion as the RSRAM process. Mr. Billingsley and Mr. Gabrielson will set this up.

Also, it was suggested that we get information from MAG on how much money they spend each year with the nonattainment issues in Maricopa County, since that figure will probably be very persuasive.

#### AGRICULTURE GROUP - 1:30 PM

Attendees: Pinal County Air Quality Staff, representatives of the cotton growers, dairies and cattle feedlots, and Arizona Department of Agriculture.

After a brief introduction of the meeting attendees, Mr. Don Gabrielson asked Mr. Bas Aja of the Arizona Cattle Feeders Association, to talk about their proposal.

Mr. Aja discussed the belief that the Cowtown monitor is placed unfairly. Since the basic control measure for cattle feedlots is spraying water, they will be conducting a study some time this fall to see how different water application rates and varying the timing that water application will affect the monitor concentrations. They are also interested in examining the residual effect from those measures.

The measures they will use in the study will be spraying a certain amount of water in the pens during a specific time frame. They will also use some gravel down in certain areas. There will be continued discussions with the County. If the study shows there is nothing they can do within a budget, then they will propose to go into nonattainment. Mr. Aja also discussed the cattle feeders current appeal of the current standards.

Mr. Rick Lavis of the Arizona Cotton Growers Association discussed how the effectiveness of the various agricultural BMP measures in Maricopa County have been quantified. He's unsure whether they translate the same way in Pinal County.

Mr. Gabrielson explained that in Pinal we're looking at 24-hour events under both stagnation and wind conditions. He asked Mr. Lavis about the Best Management Practices (BMPs) used during stagnation.

Mr. Lavis indicated the only one they had is cessation of night tilling on High Pollution Advisory days, between 2 and 8 am. But in Pinal County, HPAs are not effectively communicated, so farmers would have a more difficult time finding out about HPAs. According to San Joaquin and Maricopa County, cessation of night tilling only reflects a reduction of 3-4 tpy.

Mr. Gabrielson asked about apron roads since irrigation may occur on the average every 2 weeks. Harvesting is a one time per year activity. Irrigation is year round, during stagnation and during windy days. When the wind blows the fields are not as big of an impact as apron roads. Mr. Gabrielson asked whether it would be feasible to water apron roads on a recurring basis, or put a dust palliative.

In response to Mr. Gabrielson's question about irrigators traveling on apron roads, Mr. Wuertz and Mr. Boyle explained the irrigation cycles for various crops. Alfalfa requires water every 14 days. Wheat starts out with a 3 week watering cycle, which increases to a 10 day cycle as the crop reaches maturity. Corn has a 7-10 day watering cycle. Most crops are annual, but alfalfa can produce up to 9 (?) or 10 (?) cuttings per year.

The issue of water used for control was discussed. Growers get charged for what they use water for, and where it comes from. They may not want to use the water to control dust since it's a commodity.

ADWR dictates that feedlots can only use 20 gal. of water per head for all activities.

Dairies can use 105 gal. per head for dairy cows. A feeder steer drinks 10-12 gal/day. Or 60 gallons if it is a lactating cow.

A stakeholder suggested that universities and EPA may have grants and graduate students available to conduct the studies for you.

The agriculture group indicated that they will come back with more ideas for the next meeting. Mr. Bas Aja will be reporting those ideas.

Mr. Gabrielson asked about bar ditches, why they are disked and not shredded. Mr. Wuertz of the Arizona Cotton Growers Association indicated that shredders too big, and disking protects against fire hazard, cigarettes from drivers. Supposedly the County has to maintain this ditches, but since they don't on a regular basis, and they get overgrown, farmers do it, and they disk them. Sometimes farmers are required by landowners to keep those areas clean. Mr. Wuertz indicated that the landowners are usually developers.

Mr. Gabrielson explained his idea of a road improvement district which will include land owners. He asked whether the agriculture community would discuss this idea. There was an agreement that the agricultural community would commit to talk about funding in the future.

With the closing thought that the committee representatives would report on these discussions at the next group meeting, the agricultural discussion group adjourned.