



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 26 2011

THE ADMINISTRATOR

The Honorable Janice K. Brewer  
Governor of Arizona  
1700 West Washington Street  
Phoenix, Arizona 85007

Dear Governor Brewer:

Based on 2006-2008 air quality data, the U.S. Environmental Protection Agency (EPA) has determined that a portion of state lands in Pinal County, Arizona does not meet the 2006 24-hour fine particle (PM<sub>2.5</sub>) national ambient air quality standards (NAAQS). As directed by the Clean Air Act (CAA), EPA is designating this area as “nonattainment.” Eight counties surrounding Pinal County are being designated as “unclassifiable/attainment.” I appreciate the information that Arizona has shared with EPA as we take this step to inform citizens about their air quality and begin the process of protecting public health by reducing levels of fine particles in the air.

Fine particle pollution represents one of the most significant barriers to clean air facing our nation today. Health studies link these tiny particles – about 1/30<sup>th</sup> the diameter of a human hair – with serious human health problems including premature death in people with heart and lung disease; nonfatal heart attacks; and increased hospital admissions and doctor and emergency room visits for respiratory and cardiovascular disease.

On October 17, 2006, EPA strengthened the primary and secondary 24-hour PM<sub>2.5</sub> NAAQS from 65 µg/m<sup>3</sup> to 35 µg/m<sup>3</sup>. EPA provided guidance to states and tribes for recommending nonattainment area boundaries for the 24-hour PM<sub>2.5</sub> standard in June of 2007. Arizona provided its initial designation recommendations to EPA on December 19, 2007. This recommendation was based on 2004-2006 ambient monitoring data. For that period, Pinal County had no monitoring site with complete data indicating a violation of the standard. While EPA initially agreed with these recommendations, the delay in finalizing the 24-hour PM<sub>2.5</sub> NAAQS designations resulted in the availability of air quality monitoring data through the end of 2008. Through our review of these data, EPA determined that the “Cowtown” monitor in Pinal County was violating the 24-hour PM<sub>2.5</sub> NAAQS based on 2006-2008 data.

In October of 2009, EPA notified your office of the violating monitor. Due to this new violation, and due to the need for additional time to collect data and evaluate the area to determine an appropriate nonattainment area boundary, EPA deferred the area designation of Pinal County, Maricopa County (the other county comprising the Phoenix-Mesa-Scottsdale core-

based statistical area (CBSA)), and the seven nearby counties (Cochise, Gila, Graham, La Paz, Pima, Yavapai, and Yuma Counties) surrounding the Phoenix-Mesa-Scottsdale CBSA, for the 24-hour PM<sub>2.5</sub> standards.

In April and May of 2010, EPA sent letters to Arizona notifying the state of EPA's intentions with respect to potential modification of the initial designation recommendations for Pinal County. In a letter dated July 19, 2010, you responded to EPA's notification of the need for a modification to the state's initial designation to designate a portion of Pinal County "nonattainment" for the 24-hour PM<sub>2.5</sub> NAAQS. In this letter, you disagreed with EPA's modification, but also provided a revised recommendation with a suggested boundary for the nonattainment area in Pinal County which was smaller than the boundary EPA originally proposed. EPA reviewed your July 19, 2010 letter and associated documentation and is now making a revised boundary determination that includes the sources of PM<sub>2.5</sub> and PM<sub>2.5</sub> precursor emissions that contribute to air quality violations at the "Cowtown" monitor. The final partial Pinal County, Arizona nonattainment area remains larger than the area you recommended in your July 19, 2010 letter but excludes the Table Top Wilderness Area.

The Clean Air Act requires EPA to complete the process of designating areas as "nonattainment," "attainment," or "unclassifiable" within two years of establishing a new or revised NAAQS. For the designated Pinal County nonattainment area, Arizona must develop a State Implementation Plan (SIP) that provides for attainment of the NAAQS as expeditiously as practicable, in accordance with the requirements of the CAA and applicable EPA regulations. Pursuant to CAA section 172(b), EPA is announcing that this plan must be submitted no later than three years from the effective date of this designation, or by March 2014. The partial Pinal County nonattainment area must attain the 2006 24-hour PM<sub>2.5</sub> NAAQS as expeditiously as practicable, but no later than five years from the effective date of nonattainment designation. Staff in your EPA regional office is available to answer questions that you or your staff may have. You can also find additional technical information regarding the designations process by visiting <http://www.epa.gov/pmdesignations>.

Thank you for your continued work to improve air quality. We look forward to working with staff of the Arizona Department of Environmental Quality on these matters. If you have further questions, please contact me or your staff may call Sarah Hospodor-Pallone, Deputy Associate Administrator for Intergovernmental Relations, at 202-564-7178.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa P. Jackson", with a stylized flourish at the end.

Lisa P. Jackson