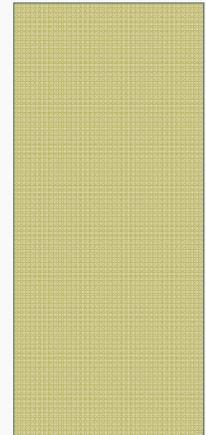


PIMA COUNTY
STATE IMPLEMENTATION PLAN
UPDATE AND
INFRASTRUCTURE ELEMENTS
PUBLIC MEETING

SARAH WALTERS
REGULATORY PROGRAM MANAGER
PIMA COUNTY DEPARTMENT OF
ENVIRONMENTAL QUALITY



SIP REVISION STAKEHOLDER MEETING

- Introductions
- Presentation: Overview of Proposed Revisions to the Pima County Portion of the Arizona State Implementation Plan (SIP)
- Question/Answer Period
- Closing remarks

PIMA COUNTY JURISDICTION

- County Statutory Authority for Air Quality Program
 - Arizona Revised Statutes (A.R.S.) 49-402
 - Arizona Revised Statutes (A.R.S.) 49-471 through 49-516
- EPA Delegations
 - Prevention of Significant Deterioration (PSD)
 - New Source Performance Standards (NSPS)
 - National Emission Standards for Hazardous Air Pollutants (NESHAP)
- Title V Program Approval (Operating Permits)

WHAT IS A SIP?

- Required by the Clean Air Act a SIP is a federally approved and enforceable plan developed by a state or local authority which identifies how it will meet and/or maintain the National Ambient Air Quality Standards (NAAQS).
- SIPs must contain certain rules showing the ability to: attain, maintain, and enforce the NAAQS.

TYPES OF SIPs

- Attainment - SIPs which are designed to prevent air quality deterioration for areas that are in attainment with the NAAQS.
- Nonattainment – specific SIP to attain the standards for each area designated nonattainment for a NAAQS.

In addition, nonattainment areas are required to adopt additional regulatory programs designed to achieve and maintain attainment of the relevant NAAQS.

TYPES OF SIPs

- Maintenance – SIPs which are designed to request redesignation to attainment and demonstrate that an area will continue to meet the NAAQS for a 20-year period.
- Infrastructure – SIP with general infrastructure elements showing the state has the capacity to attain, maintain, and enforce a new or revised NAAQS.

SIP ISSUES

- 1972: Pima County rules are initially approved into the SIP to meet requirements of the Clean Air Act of 1970
- 1982: EPA approves revisions to the SIP incorporating Total Suspended Particulate (TSP) Matter and Carbon Monoxide nonattainment plans

SIP ISSUES

- 1994 Pima County submits major revisions to SIP requesting to replace 1970 rules with the rules current at the time.
- The difference between the current approved SIP (1980) and current Pima County regulations is known as the "SIP GAP"
- Substantial changes in the PCC Title 17 since 1994 have resulted in the 1994 SIP submittal being outdated

SIP REVISION

November 5, 2012

Two Final Rules published by EPA regarding the Arizona SIP, and calls out specific rules within Pima County that are necessary to meet the infrastructure SIP requirements for the $PM_{2.5}$ and ozone NAAQS

SIP REVISION

77 FR 66398

- Partial disapproval of AZ SIP revision to meet CAA Section 110(a)(2)(E)(ii) requiring the State to comply with CAA Section 128(a)(1) for PM_{2.5} and ozone NAAQS with respect to County air quality hearing boards.

SIP REVISION

77 FR 66398 continued

- CAA Section 128(a)(1) requires that boards that approve permits or enforcement orders have “at least a majority of members who represent the public interest and do not derive any significant portion of their income from persons subject to permits and enforcement orders under [the Act].”

SIP REVISION

77 FR 66398 continued

- EPA notes that PCC 17.04.190 extends the majority membership requirement.
- However, this provision has not been submitted for incorporation into the AZ SIP

SIP REVISION

77 FR 66405

- EPA received a separate submittal from ADEQ including rules from Pima County Code. However, the submittal did not include the necessary public process documentation.

SIP REVISION

77 FR 66405

Pima County Rules noted

- PCC 17.12.040 - Reporting requirements
Stationary Source requirement for reporting excess emissions
- PCC 17.24.040 –Reporting for compliance evaluations
Ability for the control officer to require production of evidence needed to determine compliance with PCC Title 17

SIP REVISION

77 FR 66405

- SIP Rule 622 within the current approved SIP covers reporting as a permit requirement
- Rule 622 will be replaced by PCC 17.12.040 - Reporting requirements

What Next?

- Public Notice – planned publish date September 23rd and September 30th
- Public Comment – planned comment period October 1st – October 30th
- Public Hearing – planned for October 30th
- Submittal to State (ADEQ)
- ADEQ submits to EPA as an Infrastructure SIP Revision

Any Questions?

Sarah Walters

sarah.walters@pima.gov

(520) 724-7437

<http://www.deq.pima.gov/air/Rules.htm>