



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

NOV 22 2013

Mr. Eric C. Massey, Director  
Air Quality Division  
Arizona Department of Environmental Quality  
1110 West Washington St.  
Phoenix, Arizona 85007

Mr. Dennis Smith, Executive Director  
Maricopa Association of Governments  
302 North 1st Avenue, Suite 300  
Phoenix, Arizona 85003

Re: Adequacy Finding for Maricopa County PM-10 Nonattainment Area

Dear Mr. Massey and Mr. Smith:

In accordance with 40 C.F.R. § 93.118(f)(iii), this letter transmits our decision that the motor vehicle emissions budget (MVEB) for particulate matter less than 10 microns (PM-10) in the *Five Percent Plan for PM-10 for the Maricopa County Nonattainment Area (May 2012)* (Five Percent Plan) is adequate for transportation conformity purposes. Upon the effective date of this adequacy determination (15 days after publication of our determination in the *Federal Register*), the Maricopa Association of Governments (MAG) and the U.S. Department of Transportation must use the MVEB in the Five Percent Plan in future conformity analyses.<sup>1</sup>

The Five Percent Plan, which was submitted to the U.S. Environmental Protection Agency on May 25, 2012, identifies a PM-10 MVEB for the Maricopa County Nonattainment Area of 54.9 metric tons per day for 2012. We announced receipt of the Five Percent Plan and the MVEB on EPA's transportation conformity Web site on September 12, 2013 and requested public comment on the MVEB by October 15, 2013. We received no comments in response to the adequacy review posting.

In reaching our adequacy determination, we have determined that the MVEB in the Five Percent Plan, when considered with all other emissions sources in the Maricopa County Nonattainment Area, is consistent with the adequacy criteria found in 40 CFR 93.118(e)(4). We have enclosed a table that summarizes our adequacy determination. We will soon post this information on the Internet at: <http://www.epa.gov/otaq/stateresources/transconf/adequacy.htm>.

Please note that an adequacy review is separate from EPA's review of the Five Percent Plan, and should not be used to predict EPA's action for the SIP.

<sup>1</sup> Today's adequacy determination does not supercede EPA's action on an earlier PM-10 MVEB of 59.2 metric tons per day in connection with our approval of the Serious Area Plan for PM-10, which was finalized July 25, 2002. 67 FR 48718. As a practical matter, however, the MVEB in the Five Percent Plan will be controlling because it is a lower value.

If you have any questions regarding this decision, please contact Colleen McKaughan at (520) 498-0118 or Greg Nudd at (415) 947-4107.

Sincerely,



Deborah Jordan  
Director, Air Division

Enclosure

cc: Lindy Bauer, Maricopa Association of Governments  
Dean Giles, Maricopa Association of Governments  
Beverly Chenausky, Arizona Department of Transportation  
Ed Stillings, Federal Highway Administration

Enclosure

Transportation Conformity Adequacy Review

Control Strategy State Implementation Plan (SIP) Under Review: <i>Five Percent Plan for PM-10 for the Maricopa County Nonattainment Area (May 2012)</i>		Date of SIP Revision Receipt by EPA: 5/25/12
Reviewer: Greg Niudd	Date: 11/20/13	
Transportation Review Criteria		
	Is Criterion Satisfied? Y/N	Reference in SIP Document/Comments
Sec. 93.118(e)(4)(i)  The plan was endorsed by the Governor (or designee) and was subject to a public hearing.	Y	The cover letter transmitting the SIP, dated May 25, 2012, was from Henry Darwin, Director, Arizona Department of Environmental Quality (ADEQ) to Jared Blumenfeld, Regional Administrator, US EPA Region 9. There was documentation in the package demonstrating that ADEQ has been designated by the Governor of Arizona to submit such plans to EPA. There was also information in the SIP package demonstrating that the Maricopa Association of Governments (MAG) was the appropriate agency to develop the plan for the areas of Maricopa County within the PM-10 nonattainment area.  A public hearing was held by MAG on April 12, 2012. Documentation of this hearing may be found in Appendix E of the submitted plan.
Sec. 93.118(e)(4)(ii)  The plan was developed through consultation with federal, state and local agencies; full implementation plan documentation was provided and EPA's stated concerns, if any, were addressed.	Y	During the development of the plan, the structure, approach and control measures were discussed and coordinated in meetings of the MAG Air Quality Technical Advisory Committee. The almost-final version of the plan was discussed at an April 26, 2012. The Air Quality Technical Advisory Committee includes representatives from EPA, Federal Highway Administration, Arizona Department of Transportation, and local governments such as Maricopa County, Phoenix, Mesa and smaller cities.
Sec. 93.118(e)(4)(iii)  The motor vehicle emission budget(s) is clearly identified and precisely quantified.	Y	Chapter 6 of the plan clearly quantifies and identifies the motor vehicle emissions budget (pp 6-42 through 6-43). MAG used MOVES 2010a to calculate PM-10 emissions from exhaust, tire and brake wear. They used the January 2011 version of AP-42's appropriate methods to calculate re-entrained dust emissions from paved roads and dust emissions from unpaved roads.
Sec. 93.118(e)(4)(iv)  The motor vehicle emissions budget(s), when considered together with all other emission sources, is consistent with applicable requirements for reasonable further progress, attainment, or maintenance (whichever is relevant to the given plan).	Y	EPA has determined that the MVEB, when considered together with all other emission sources, are consistent with requirement to demonstrate five percent reductions until attainment, reasonable further progress and attainment of the PM-10 standard. (See Chapters 4, 5 and 6 of the plan)

Sec. 93.118(e)(4)(v)	The plan shows a clear relationship among the emissions budget(s), control measures and the total emissions inventory.	Y	<p>The on-road control measures include the use of PM-10 certified street sweepers, paving and stabilizing unpaved roads and alley and shoulders, reduced speed limits and overlaying highways with rubberized asphalt. These were implemented as advanced contingency measures and the reductions were not considered in demonstrating 5% reductions, RFP or attainment, but these controls are assumed in the calculation of the MVEB. (Chapter 4)</p> <p>There were some ancillary benefits to the on-road emissions due to increased compliance with Maricopa county rules for stabilizing private unpaved roads and alleys. These benefits were included in the emissions inventory for the 5% reductions, RFP and attainment demonstrations and in the MVEBs. (Chapters 5 and 6)</p>
Sec. 93.118(e)(4)(vi)	Revisions to previously submitted control strategy or maintenance plans explain and document any changes to any previous submitted budgets and control measures; impacts on point and area source emissions; any changes to established safety margins (see §93.101 for definition), and reasons for the changes (including the basis for any changes to emission factors or estimates of VMT.	Y	<p>The previous MVEB under the approved Serious Area Plan for PM-10 was 59.7 metric tons per day of PM-10. The budget in this plan is 54.9, which is lower due to changes in methodology, improvements in rule compliance and reductions due to paving of roads, alleys and shoulders and from improved street sweepers. 84.6% of the on-road emissions are from re-entrained dust and dust from unpaved roads and alleys. These emissions are calculated using methods from AP-42. EPA has reviewed the AP-42 method, resulting in a more accurate, but lower estimate of emissions for the Maricopa County PM-10 Nonattainment Area. This calculation is discussed on in Chapter 5 of the 2008 Maricopa County Emissions Inventory which is included as Appendix A of the plan. As a result of these changes, the a smaller emissions budget is appropriate for the area, even though vehicle miles traveled is increasing.</p> <p>The other required reductions for the demonstrations in the plan were made by improving compliance with dust control regulations for construction projects and undeveloped lands. The area is also making good progress reducing road-related emissions by improved street sweeping and a program to pave or stabilize roads, alleys and shoulders.</p>
Sec. 93.118(e)(5)	EPA has reviewed the State's compilation of public comments and response to comments that are required to be submitted with any implementation plan.	Y	<p>MAG accepted and responded to verbal and written public comments on the plan as part of their public hearing process documented in Appendix E of the plan. MAG addressed all public comments in detail and submitted both the comments and their responses as part of Appendix E. EPA has reviewed these comments and responses and has considered them in our finding that the MVEBs are adequate.</p>