



SALT RIVER

PIMA-MARICOPA INDIAN COMMUNITY

10005 East Osborn Road / Scottsdale, Arizona 85256-9722 / Phone (480) 362-7400 / Fax (480) 362-7593

December 4, 2013

Jared Blumenfeld, Regional Administrator
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

RE: Area Designation of 2012 Revised Primary Annual PM_{2.5} National Ambient Air Quality Standard for Salt River Pima-Maricopa Indian Community

Dear Mr. Blumenfeld,

The Salt River Pima-Maricopa Indian Community (SRPMIC) is a federally recognized tribe interested to provide the opportunity to participate in the recommendation process for designating areas for the Environmental Protection Agency's (EPA) National Ambient Air Quality Standard (NAAQS) on 2012 revised primary annual PM_{2.5} pollutant. The proposed processes regards to December 14, 2012, when EPA revised the primary annual PM_{2.5} NAAQS that strengthen the standard from 15.0 micrograms per cubic meter (ug/m³) to 12.0 ug/m³, but retained the existing 24-hour PM_{2.5} standard at 35 ug/m³. These designation process based on Clean Air Act (CAA) section 107(d) requires designating all areas of the country in a timely manner following promulgation of a new or revised NAAQS.

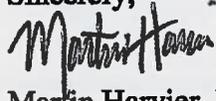
We recognize EPA's mission is to protect human health and the environment to set limits on levels of certain air pollutants to ensure necessary health and environmental protections as well as providing support and funding for air quality agencies. We appreciate the opportunity to submit our recommendation of the revised primary annual PM_{2.5} NAAQS area designation.

The SRPMIC has collected sufficient air quality information to determine the area is meeting the NAAQS. The tribal air quality data is certified annually in EPA's Air Quality System (AQS) and the data is sufficient quality to be used for designation purposes. The air quality status of PM_{2.5} concentration design values for 2010 to 2012 is well below the NAAQS standard therefore, the Community is recommending the area to be designated "attainment".

The SRPMIC provides an attached document of air quality data information that supports the area recommendation to 2012 revised primary annual PM_{2.5} NAAQA designation. Should you have any questions or concerns with comments addressed with Christopher

Horan, Environmental Protection & Natural Resources Division Manager at 480-362-7639 or christopher.horan@srpmic-nsn.gov.

Sincerely,

A handwritten signature in black ink that reads "Martin Harvier". The signature is written in a cursive style with a small mark above the "i" in "Harvier".

Martin Harvier, Vice President
Salt River Pima-Maricopa Indian Community

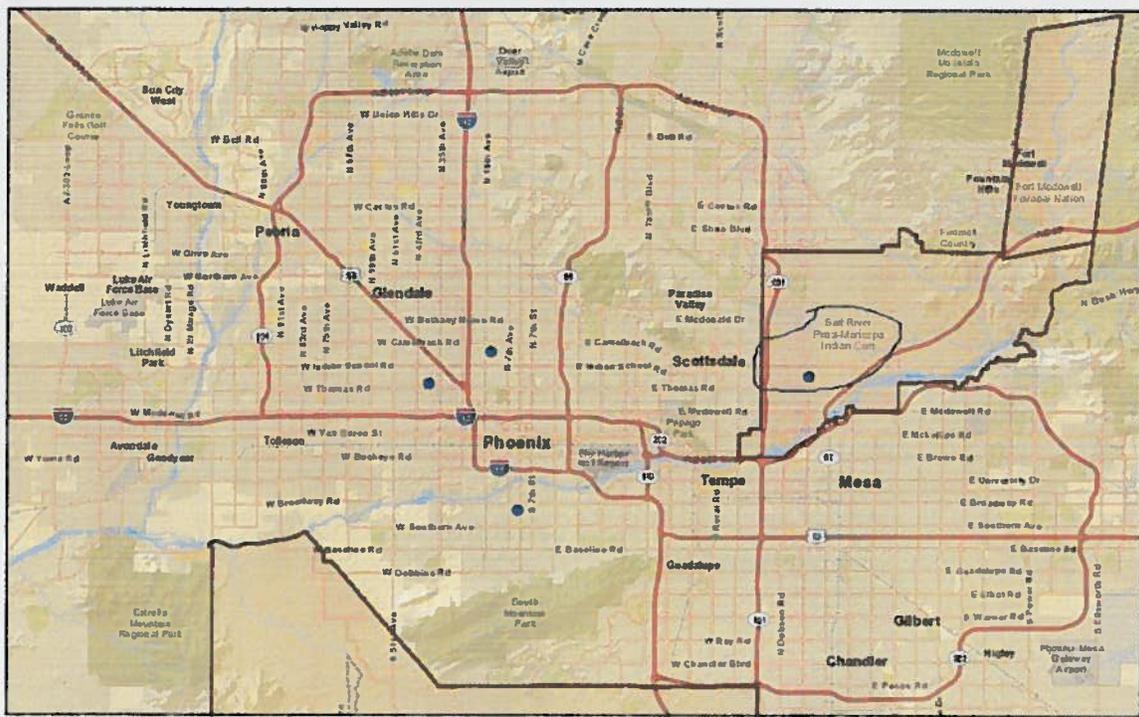
Cc: Christopher Horan, CDD-Environmental Protection & Natural Resources, Division
Manager

Analysis Factor in Support of 2012 Revised Annual PM_{2.5} Area Designation

Salt River Pima-Maricopa Indian Community (SRPMIC or Community) is located in Maricopa County, AZ, is situated within a large metropolitan region with a population of over 3 million people that includes the cities of Mesa and Tempe to the south, the cities of Phoenix and Scottsdale to the west and the cities of Fountain Hills and Scottsdale to the reservation's northern boundary. The SRPMIC, established by Executive Order in 1879, is home to over 10,000 O'Odham (Pima) and Piipaash (Maricopa) members residing within a 54,000 acre reservation land.

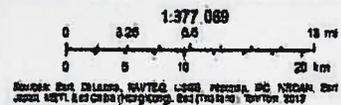
The SRPMIC's location within a dense urban region results in a broad range of economic development and land uses which, in turn, lead to variety of pollution sources. The SRPMIC includes 12,000 acres of agricultural cultivation, large scale aggregate mining operation as well as landfill operations. The continued urbanization of the region has also encroached on the Community boundaries, with major highways such as the Pima Loop 101 (Hwy 101-Pima Freeway), Loop 202 (Red Mountain Freeway) and Beeline Highway (AzHwy 87) coursing through the Community.

PM_{2.5} Designate Site Map



November 14, 2013

- | | | | |
|---------------------|--------|------------------------|-------------|
| 50,000 - 500,000 | Daily | ALASKA_NATIVE_VILLAGES | 0 - 12.0 |
| 500,001 - 1,000,000 | Annual | ALASKA_RESERVATIONS | 12.1 - 19.0 |
| 1,000,001 and above | Both | LOWER48_TRIBES | |

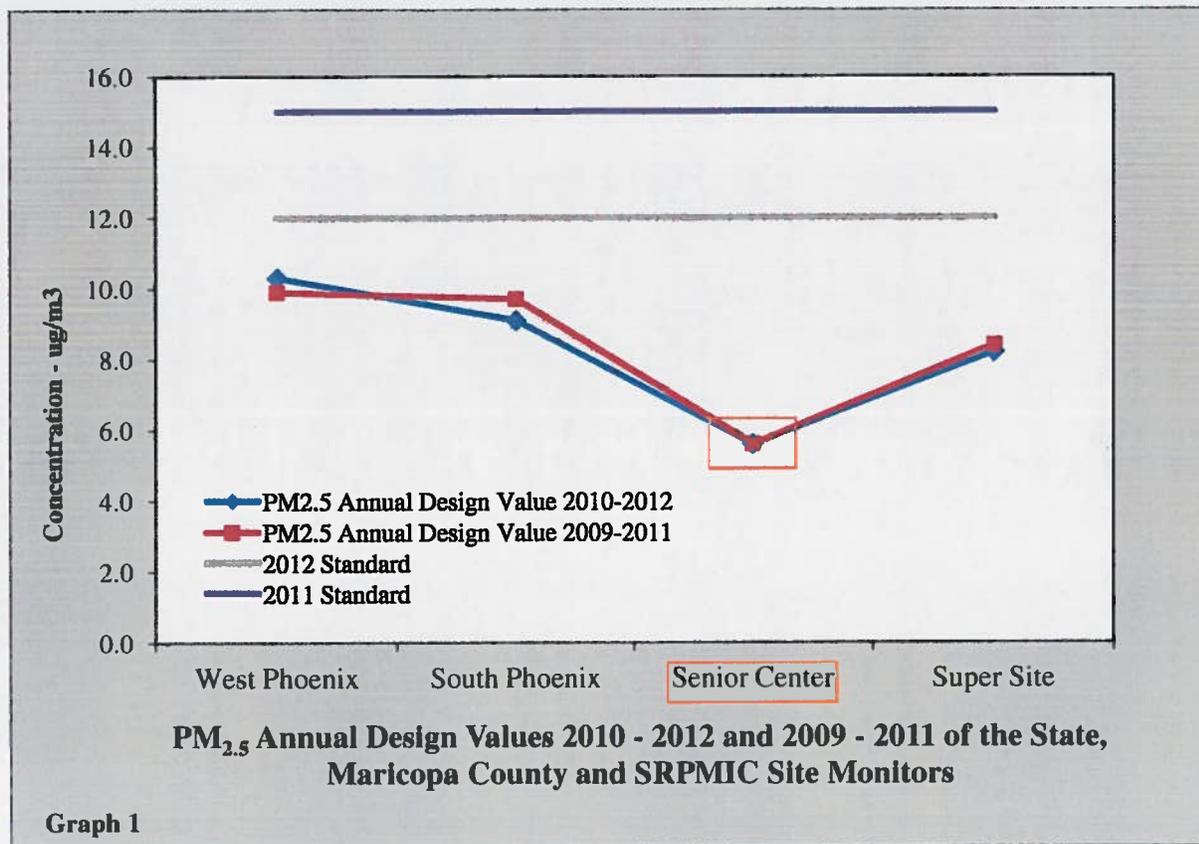


Map 1

In response to Area Designation of 2012 Revised Primary Annual PM_{2.5} National Ambient Air Quality Standard (NAAQS) letter to the SRPMIC, the Community recommends the SRPMIC tribal community be in "attainment" status based on the data analysis provided along with accompanying factors for the PM_{2.5} designation process. The design value PM_{2.5} concentration within SRPMIC air quality status is lower than the NAAQS level.

The PM_{2.5} is monitored at the SRPMIC's Senior Center air monitoring station which is designated as State and Local Air Monitoring Station (SLAMS) Tribal monitoring station, AQS site ID 040137020 in Maricopa County, AZ. The data collected from this monitor is a regulatory monitor in compliance with 40 CFR Part 58 Appendix A and have adequately achieved the quality assurance and data requirements for annual data certifications.

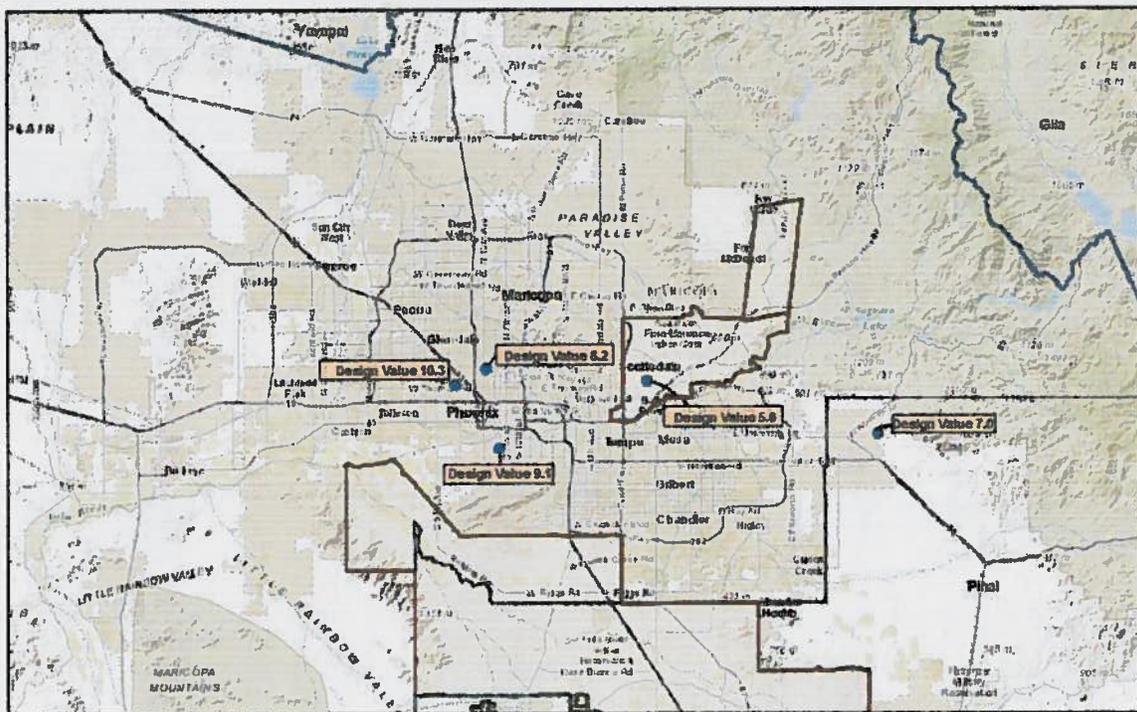
The PM_{2.5} annual design value for 2010 to 2012 in Graph 1 show the SRPMIC site monitor Senior Center at 5.6 ug/m³ along with site monitors West Phoenix and South Phoenix from Maricopa County and one site monitor Super Site from the (State) Arizona Department of Environmental Quality (ADEQ). Also graphed is the PM_{2.5} annual design value for 2009 – 2010 that all graphs shown are below the NAAQS standard and Senior Center annual design value is the lowest of the four monitors.



Map 2 of PM_{2.5} Design Value Annual 2010 – 2012 below is the locations of site monitors with identified values of concentration on the map and Senior Center is 5.6 ug/m³. The sites directly west from Senior Center location are ADEQ Super Site with 8.2 ug/m³ concentration at a distance approximately 16 miles and the Maricopa County site West Phoenix 10.3 ug/m³ at approximately 20 miles. Towards southwest with value of 9.1 ug/m³ is Maricopa County site South Phoenix at approximately 17 miles and at the east location with 7.0 ug/m³ is Apache Junction site in Pinal County at approximately 26 miles.

The SRPMIC's PM_{2.5} data indicates the lowest of the five locations for the 2010- 2012 annual design value for the area that evidently would categorize as attainment area. All of the sites annual design values are below the 2012 PM_{2.5} NAAQS standard at 12 ug/m³.

PM_{2.5} Design Value Annual 2010-2012



November 18, 2013

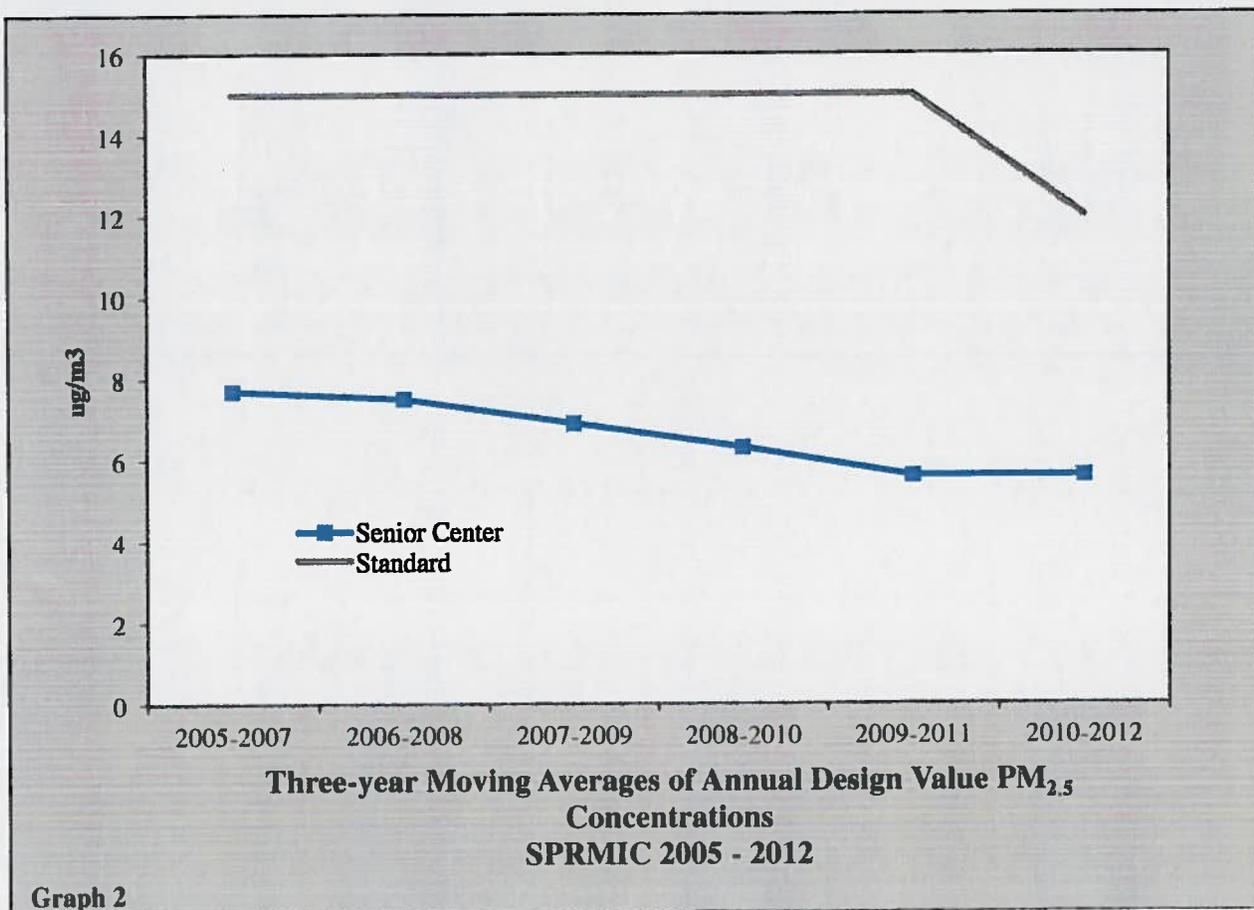
50,000 - 500,000	Daily	ALASKA_NATIVE_VILLAGES	0 - 12.0
500,001 - 1,000,000	Annual	ALASKA_RESERVATIONS	12.1 - 19.0
1,000,001 and above	Both	LOWER48_TRIBES	County Boundaries

Scale: 1:754,137
 0 5 10 20 40 miles
 0 10 20 40 kilometers
 SOURCE: GIS DATA FROM NAVTEQ, TERRA, PHOENIX JUNCTION AND GCSO, USGS, AND AIR VECAN, PHOENIX, AZ, AND SURROUNDING AREAS.

Map 2

The annual average concentrations of PM_{2.5} at the SRPMIC locations have shown a general decline since 2005 and leveled out in 2011 and 2012. A graph of the three-year moving averages of the annual design value PM_{2.5} is provided in Graph 2. Data collected during 2007 was included in the moving averages although data recovery for that year was less than 75%.

The graph indicates the concentrations of PM_{2.5} have decreased through the years for Annual Design Value and the last two years are well below the level of the NAAQS new 2012 annual standard at 12 ug/m³.



Concentrations of PM_{2.5} are well below the standard. A graph of the three-year moving averages of the 98th percentile of the 24-hour average concentrations is provided in Graph 3. Data collected during 2007 was included in the moving averages although data recovery for that year was less than 75%.

