



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

AUG 22 2017

The Honorable Doug Ducey
Governor
State of Arizona
1700 West Washington Street
Phoenix, Arizona 85007

Dear Governor Ducey:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's (EPA's) intended designations for certain areas in Arizona for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in a letter dated May 25, 2011, and in several subsequent submittals.¹

On July 25, 2013, the EPA designated certain areas in 16 states as nonattainment, but did not at that time designate other areas. Additional areas were designated on June 30, 2016, and November 29, 2016. In Arizona, the following areas were designated in these previous actions: the Miami SO₂ Planning Area, and the Hayden SO₂ Planning Area. Pursuant to a March 2, 2015, court-ordered schedule,² the agency must complete the remaining SO₂ designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of the EPA's assessment of your state's recommended designations for all remaining undesignated areas in Arizona. We are in general agreement with your recommendation for these areas.

If you or your staff have additional information that the EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at www.regulations.gov, and sending a copy to EPA Region 9. The EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on the EPA's intended designations.

Arizona has recommended a designation of unclassifiable for the areas indicated below. EPA regulations for implementing the SO₂ NAAQS require Arizona to characterize SO₂ air quality in each listed area. In considering your recommendation, we have taken into account all available information, including any

¹ The Arizona Department of Environmental Quality also provided information relevant to these designations in letters and other correspondence dated January 12, 2017, March 3, 2017, March 6, 2017, and July 26, 2017.

² *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Arizona or by a third party. Our review of this information indicates that it is consistent with a designation of unclassifiable/attainment.

Unclassifiable/Attainment Area ^a	Included Counties
Navajo County	Navajo County (p), includes all lands of the White Mountain Apache Tribe, ^b and excludes lands of the Navajo Nation ^c and lands of the Hopi Tribe ^d
Apache County	Apache County (p), excludes lands of the White Mountain Apache Tribe ^b and lands of the Navajo Nation ^c
Cochise County	Cochise County

(p) indicates portion of county

^a Includes areas of Indian country geographically located in the county, unless otherwise noted. The inclusion of areas of Indian country in the designated areas for Arizona represents a modification to the designations most recently recommended by Arizona.

^b Lands of the White Mountain Apache Tribe are geographically located in Navajo, Gila, and Apache counties. All are included with the Navajo County unclassifiable/attainment area.

^c The EPA is addressing the lands of the Navajo Nation in Chapter 24 of the Technical Support Document for the EPA's intended designations.

^d The EPA intends to designate the lands of the Hopi Tribe, geographically located in Navajo and Coconino Counties, as a separate unclassifiable/attainment area.

Enclosure 1 to this letter provides the information that supports the intended designation decisions for these areas in Arizona.³

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Arizona that were not required to be characterized and for which the EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in the last section of the enclosure.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. Upon the completion of this designation action, there will be no remaining areas in Arizona to be designated.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement

³ Enclosure 1 is Chapter 4 of the Technical Support Document for the designations the EPA plans to complete by December 31, 2017, that addresses areas in Arizona. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>.

the 2010 primary SO₂ NAAQS. For additional information regarding designations under the SO₂ NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Meredith Kurpius at (415) 947-4534 or kurpius.meredith@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alexis Strauss".

for Alexis Strauss
Acting Regional Administrator

Enclosure

cc: Misael Cabrera, Director, Arizona Department of Environmental Quality (ADEQ)
Timothy Franquist, Air Quality Division Director, ADEQ (by email)