



P I N A L • C O U N T Y
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To: Pinal County Board of Supervisors

From: Mike Sundblom
Director, Pinal County Air Quality 

Date: November 18, 2016

Re: Comments received – proposed surface coating rule, Chapter 5, Article 13

There were two comments received on the proposed surface coatings rule (Chapter 5, Article 13) during the public comment period that ended at the close of business on the day of the Oral Proceeding (9/27/16).

1. EPA Region 9's comment is below. Pinal County's response is included in the Concise Explanatory Statement.

Section 5-13-300, Part 2, paragraph (i) (e), defines alternative application method, as "any method approved by the administrator as high volume low pressure (HVLP)-equivalent." A replicable procedure to determine equivalency with HVLP should be specified in the rule to avoid inappropriate administrator's discretion. Please remove paragraph (i)(e) or reference the following EPA-approved procedures in the rule to determine transfer efficiency and HVLP equivalency.

- "Spray Equipment Transfer Efficiency Test Procedure for Equipment User," South Coast Air Quality Management District (SCAQMD), May 24, 1989.
- "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns," SCAQMD, September 26, 2002.

2. The other comment received was from Ms. Candace Hughes, see below.

Please forward to the county supervisors my support of local, state and federal enforcement of stricter rules for ozone containment, particularly for the delivery of fuel to gas stations and for the use of spray paint on metal. The health consequences of increased ozone pollution affects education, tourism, relocation of businesses and homeowners, and the attraction of winter residents. I would like to know how the board of supervisors votes on this issue as I will be out of state with elderly parents in the next month. Candace Hughes, 2051 S. Mountain View Road, Apache Junction 85119