



PINAL COUNTY
wide open opportunity

To: Pinal County Board of Supervisors

From: Mike Sundblom
Director, Pinal County Air Quality

Date: November 18, 2016

Re: Concise Explanatory Statement pursuant to A.R.S. §49-471.07(B)

Proposed Resolution No. 113016-AQ1

Proposed Ozone RACT Rule for Surface Coatings for the
Pinal County portion of the Phoenix-Mesa 8-hour ozone Nonattainment Area

1. This explanation supports the request that the Pinal County Board of Supervisors approve Resolution No 113016-AQ1, which includes the full text of certain rule revisions and additions.
2. Incorporated in this Concise Explanatory Statement is an EPA comment and Pinal County Air Quality's response.

EPA COMMENT

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.

RESPONSE

Since there are several application methods listed in 5-13-300.2(i), Pinal County Air Quality agrees with EPA and has removed the alternative application method language from the final rulemaking proposal going to the Board of Supervisors. The original proposed language that is being removed per EPA's comment is shown as underlined and strikeout in Pinal County Board of Supervisors Resolution No. 113016-AQ1.