



PINAL • COUNTY  
*wide open opportunity*

To: Pinal County Board of Supervisors

From: Mike Sundblom  
Director, Pinal County Air Quality 

Date: November 18, 2016

Re: Comments received and response to comments for the proposed Gasoline Dispensing Facility rule, Chapter 5, Article 20

There were two comments received on the proposed gasoline dispensing facility rule (Chapter 5, Article 20) 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 and Pinal County Air Quality's response is below.

We are providing comments based on our preliminary review of the draft rule identified above.. Please direct any questions about our comments to me at (415) 947-4115 or to James Shears at (213) 244-1810.

Section 5-20-100.3.d exempts all agricultural stationary gasoline dispensing tanks from vapor control requirements except for general housekeeping. It is not clear why tanks in agricultural operations should be subject to different requirements from similar tanks in other industries. We also understand from a conversation with Pinal County Air Quality staff that there are no agricultural operations in the ozone nonattainment portion of Pinal County. Therefore, there is no need for this exemption provision and it should be removed.

The Pinal County Air Quality response to the EPA comment, there are no agricultural fuel tanks in the Pinal County portion of the ozone nonattainment area. The agricultural tanks exemption will remain in the proposed rule for the simple fact that it maintains consistency between the Pinal County RACT rule and Maricopa County's RACT rule (Rule 353). The full Pinal County Air Quality response is on page 7 of the document "Reasonably Available Control Technology (RACT) Analysis, Negative Declaration and Rules Adoption" which is included in the Board of Supervisors agenda packet for the Public Hearing scheduled for November 30, 2016.



PINAL • COUNTY  
*wide open opportunity*

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