To: Chan, Janice[Chan.Janice@epa.gov]
Cc: Chen, Eugene[Chen.Eugene@epa.gov]; Chew, Andrew[Chew.Andrew@epa.gov]; Alkon, Margaret[Alkon.Margaret@epa.gov]; Christenson, Kara[Christenson.Kara@epa.gov]
From: LEVIN, NANCY
Sent: Sat 11/5/2016 1:10:30 AM
Subject: RE: ADEQ "Area A" definition or applicability

"Area A" is defined in ARS-541(1), which we approved it into the SIP on 5/22/2013, 68 FR 2912. It's boundaries overlap and extend beyond the PM-10 nonattainment area. I asked ADEQ for a map and will pass it on when I get it.

FYI – there is no mention of "Area A" in the SIP-approved (adopted 1998, published 10/11/2001; 66 FR 51873) versions of Maricopa Ag BMP rules R18-2-610 and R18-2-611.

Since 2001, ADEQ adopted new rules for Maricopa AgBMPs, but these rules are not in the SIP, hence, not federally-enforceable.

A notable difference between the SIP-approved Maricopa AgBMP rule (approved 2001) and the latest ADEQ (but not in SIP) Rule 610 Definitions Rule:

SIP-approved AgBMP 610 definition for Maricopa PM10 naa -- "Commercial farm" means 10 or more contiguous acres of land used for agricultural purposes within the boundary of the Maricopa PM nonattainment area."

Current State AgBMP 610 definition for Maricopa PM10 naa (not in SIP) -- "Commercial farm" means 10 or more contiguous acres of land used for agricultural purposes within the boundary of the Maricopa PM nonattainment area and Maricopa County portion of Area A…"

Ex. 5 & 7

Nancy Levin | 415-972-3848 | Rules and Planning

Air Division | Region IX| U.S. Environmental Protection Agency

From: Chan, Janice
Sent: Friday, November 04, 2016 4:48 PM
To: LEVIN, NANCY <Levin.Nancy@epa.gov>
Cc: Chen, Eugene <Chen.Eugene@epa.gov>; Chew, Andrew <Chew.Andrew@epa.gov>; Alkon, Margaret <Alkon.Margaret@epa.gov>
Subject: ADEQ "Area A" definition or applicability

Hi Nancy,

I have been informed by Hickman that the reason why their Arlington facility is covered under the Arizona Ag BMP is because ADEQ considers that they are engaged in a regulated agricultural activity in "Area A". I understand that the regulated agricultural activity now includes animal, not just crops.

I tried to look up what Area A means, but I can't find it. Do you know what that means?

Janice

Janice Chan

Environmental Protection Specialist

U.S. Environmental Protection Agency, Region 9

Enforcement Division

Air & TRI Section (ENF-2-1)

75 Hawthorne Street

San Francisco, CA 94105

P: 415-972-3308

F: 415-947-3519

Chan.Janice@epa.gov

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