



City of Phoenix
OFFICE OF ENVIRONMENTAL PROGRAMS

February 3, 2006

Mr. Fred Butterfield, Designated Federal Officer (DFO)
EPA Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

RE: City of Phoenix Comments to Clean Air Science Advisory Board (CASAC)

Dear Mr. Butterfield:

The City of Phoenix is very concerned about the exemption for agriculture and mining operations in the proposed revisions to the National Ambient Air Quality Standards (NAAQS) published in the Federal Register on January 17, 2006. The Mayor and City Council discussed this issue at the City Council Policy meeting this week and expressed their concerns that these exemptions will have a critical impact on our ability to protect public health. The City of Phoenix will be submitting more detailed comments to the Environmental Protection Agency (EPA) before the end of the current public comment period.

The 2004 Revised PM-10 State Implementation Plan for the Salt River shows that rock and gravel mining industries and agricultural sources represent a significant portion of the emissions inventory in the area and routinely contribute to violations of the health standard. The County regulation of rock and gravel mining, and the State's requirements for agricultural Best Management Practices have been important tools in the efforts to meet the particulate standards in the Phoenix urban area. We anticipate that even more stringent regulation of those industries will be critical to meeting the proposed coarse particulate standard.

The City of Phoenix is committed to reducing air pollution and ensuring a healthy environment for our residents. Over the past 5-6 years, the City of Phoenix has invested nearly \$20 million in dust control programs and we are prepared to do more. However, we are concerned that the proposed exemptions for mining and agricultural activities will make it impossible for the area to meet the particulate health standards.

Sincerely,

Gaye Knight, MPA MT
Air Quality Specialist

R:\Air\SIP Issues\CASAC comments - new PMstd-February 3.doc