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To Whom It May Concern:

PROJECT LOCATION: Graham County, Arizona

The Air Quality Division has reviewed the project, program or plan you submitted for a General Conformity Determination with the Arizona State Implementation Plan in accordance with Clean Air Act Section 176(c)(1); 58 Federal Register 63214-63259; Title 40 Code of Federal Regulations Part 51, Subpart W §§ 51.850-51.860; Title 40 Code of Federal Regulations Part 93, Subpart B §§ 93.150-160; and Arizona Administrative Code R18-2-348 (approved into the Arizona State Implementation Plan April 23, 1999; effective June 22, 1999). The Air Quality Division has concluded that a General Conformity Determination is not required for the following reason(s):

- Not a Federal action as defined in Title 40 CFR § 51.852 [and § 93.152]
- X Not in a Nonattainment or Maintenance area
- Exempt Federal action listed in Title 40 CFR § 51.853(c) [and § 93.153(c)]
- Exempt Federal action because of other applicable Federal requirements pursuant to Title 40 CFR § 51.853(d) [and § 93.153(d)]
- Federal action that is part of a continuing response to an emergency or disaster under Title 40 CFR § 51.853(d)(2) [and §94.153(d)(2)] more than 6 months after the emergency or disaster for which Federal agency has made a written determination under Title 40 CFR § 51.853(e) [and § 93.153(e)]
- Listed on a Federal agency list of Federal actions presumed to conform pursuant to Title 40 CFR §51.853(g)(1) or (2) [and § 93.153(g)(1) or (2)] that has been published in the Federal Register; *and* presumption has not been rebutted; *and* it is not a Regionally Significant project pursuant to Title 40 CFR § 51.853(i) [and § 93.153(i)]. Example: HUD list of categorically excluded projects codified at Title 24 CFR § 58.35
- Project's total emissions of each identified air pollutant to be emitted from the project would be less than *de minimis* levels in Title 40 CFR § 51.853(b) [and §93.153(b)] as described or calculated

Nevertheless, to comply with other applicable air pollution control requirements and minimize adverse impacts on public health and welfare, the following information is provided:

PREVENTION of POTENTIALLY FATAL CARBON MONOXIDE (CO) HOTSPOTS during Boating Events

A CO hotspot problem can result from emissions of a large number of boats idling in close proximity for extended periods of time. The 1-hour exposure standard for CO is

limited to 35 parts per million, according to EPA. The American Conference of Governmental Industrial Hygienists CO limit is 125 parts per million, which should never be exceeded. Fatalities and CO poisoning have occurred at Lake Havasu events, according to an April 23, 2004, article in Morbidity and Mortality Weekly Report (pp. 314-318). Adverse effects from exposure to ambient levels of CO were experienced by vacationers and by workers.

ADEQ strongly recommends ambient air monitoring during boating events to prevent exceedances of the described CO exposure limits. Emission reduction measures such as a "no idling" policy when boats are stationary are recommended. So long as such air monitoring and emission reduction measures are undertaken, ADEQ finds that the proposed event would not have a significant adverse impact on air quality.

#### PREVENT RELEASE OF REGULATED ASBESTOS FIBERS

Title 40 Code of Federal Regulations § 61.145 contains requirements to survey for the presence of asbestos at each demolition or renovation activity prior to demolition or renovation (Asbestos National Emission Standards for Hazardous Air Pollutants. A 10-day advance notification of demolition is required for every demolition project (unless at an exempt facility) and for any renovation project that would disturb at least 260 linear feet, on pipes, at least 160 square feet on other components, or at least 35 cubic feet where length or area cannot be measured. A permit may be required. To determine applicability of asbestos survey and work practice standards, please contact the Environmental Program Specialist, Air Quality Division Compliance Section at (602) 771-2333.

#### REDUCE DISTURBANCE of PARTICULATE MATTER during CONSTRUCTION

This action, plan or activity may temporarily increase ambient particulate matter (dust) levels. Particulate matter 10 microns in size and smaller can penetrate the lungs of human beings and animals and is subject to a National Ambient Air Quality Standard (NAAQS) to protect public health and welfare. Particulate matter 2.5 microns in size and smaller is difficult for lungs to expel and has been linked to increases in death rates; heart attacks by disturbing heart rhythms and increasing plaque and clotting; respiratory infections; asthma attacks and cardiopulmonary obstructive disease (COPD) aggravation. It is also subject to a NAAQS.

The following measures are recommended to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site:

- I. Site Preparation and Construction
  - A. Minimize land disturbance;
  - B. Suppress dust on traveled paths which are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust entering ambient air

- C. Cover trucks when hauling soil;
- D. Minimize soil track-out by washing or cleaning truck wheels before leaving construction site;
- E. Stabilize the surface of soil piles; and
- F. Create windbreaks

II. Site Restoration

- A. Revegetate any disturbed land not used;
- B. Remove unused material; and
- C. Remove soil piles via covered trucks.

The following rules applicable to reducing dust during construction, demolition and earth moving activities are enclosed:

- X Arizona Administrative Code R18-2-604 through -607
- X Arizona Administrative Code R18-2-804
- Maricopa County Code Rules 310 and 310.01
- Pima County Code Chapter 17.16 Article III
- Pinal County Code Chapter 4

Should you have further questions, please do not hesitate to call Andra Juniel at (602) 771-4417 or Dave Biddle at (602) 771-2376 of the Planning Section Staff.

REDUCE REGIONAL HAZE

Particulate Matter contributes to Regional Haze that impairs visibility at national parks and monuments (Federal Class I areas), including Grand Canyon National Park on the Colorado Plateau. Although no specific Regional Haze reduction measures are in effect in the proposed project area at this time, measures that reduce disturbance of Particulate Matter also reduce Regional Haze.

PRESCRIBED FIRE ACTIVITIES

Fire creates smoke that includes a complex mix of air pollutants. Prescribed fire planning should minimize the effects of smoke on public health, public nuisance, and visibility in Federal Class I Areas. Prescribed fire activities must also comply with the requirements of Title 18, Chapter 2, Article 15 of the Arizona Administrative Code entitled "Forest and Range Management Burns." For further information regarding requirements for prescribed burns, please contact the Environmental Program Specialist at (602) 771-2363.

Very truly yours,

Date: 7/12/06



Diane L. Arnst, Manager  
Air Quality Planning Section

Cc: Edward M. Ranger, EV Administrative Counsel  
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File: 132184

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