



**ARIZONA  
ROCK  
PRODUCTS  
ASSOCIATION**



August 24, 2012

Steve Trussell  
Executive Director  
Arizona Rock Products Association  
916 W. Adams  
Phoenix, AZ 85296

The Honorable Lisa Jackson  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: National Ambient Air Quality Standards for Particulate Matter, Proposed Rule  
Docket No. EPA-HQ-OAR-2007-0492, 77 FR 38890 (June 29, 2012)

Dear Administrator Jackson:

On behalf of Arizona Rock Products Association, the following comments are provided regarding the Environmental Protection Agency's (EPA's) proposed rule for the national ambient air quality standards (NAAQS) for particulate matter (PM). Our comments can be summarized as follows:

- The coarse standard should be retained because there is no adequate scientific basis for a revised standard;
- EPA's proposal not to include PM<sub>10</sub> in the final visibility standard also should be retained in the final rule due to technical difficulties and limited benefits; and,
- If the PM<sub>2.5</sub> annual standard is reduced, it should not be reduced below 13 ug/m<sup>3</sup>.

These comments are discussed in more detail below.

#### EPA Should Retain the Current PM<sub>10</sub> Standard

EPA should retain the current short-term PM<sub>10</sub> standard of 150 ug/m<sup>3</sup> for the following reasons:

- The PM Integrated Science Assessment concludes that recent health effects studies do not provide an adequate scientific basis for a revised Coarse PM standard due to inconsistent findings, marginal or no effects, the effects of other pollutants, large regional variability and data deficiencies ;

- The PM risk assessment finds that the uncertainties associated with the recent Coarse PM-related studies render them incapable of supporting a sound quantitative risk assessment; and,
- The Clean Air Scientific Advisory Committee recommendation to reduce the primary Coarse PM standard should be rejected, because it does not explain how the Committee considered the limitations of the coarse PM studies and is not consistent with the more specific advice of the Committee and its individual members.

EPA Should Exclude Coarse PM in the Visibility Indicator

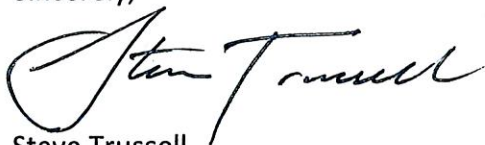
EPA should exclude coarse PM from the new visibility standard for the PM secondary standard. EPA's Urban Visibility Assessment acknowledges that the light extinction from coarse PM is less than fine PM. Fugitive fine soil (crustal) emissions from a variety of natural sources during high wind periods significantly complicates evaluation and control of the small visibility impact of coarse PM fugitive dust emissions from stationary sources.

The Annual PM<sub>2.5</sub> Should Not Be Reduced Below 13 ug/m<sup>3</sup>

The PM<sub>2.5</sub> health effects data summarized in the PM Integrated Science Assessment do not indicate a definitive level where improvement occurs. For this reason, EPA should not reduce the PM<sub>2.5</sub> annual standard below 13 ug/m<sup>3</sup>.

Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Trussell". The signature is written in a cursive, flowing style.

Steve Trussell  
Executive Director