



Memorandum

**TO: Missoula City-County Air Pollution Control Board
Missoula Air Quality Advisory Council**

FROM: Shannon Therriault, R.S.

DATE: October 2, 2003

RE: Carbon Monoxide Redesignation

Last week, as I was working on the carbon monoxide (CO) redesignation request, I discovered that we need to do a little more work in order to meet the federal requirements for applying for redesignation. The Department is conferring with the Montana Department of Environmental Quality (DEQ) and the U.S. Environmental Protection Agency (EPA) on these issues. Because Missoula is designated as a “moderate” CO non-attainment area, we cannot use the same methods as other Montana CO non-attainment areas (which were “low”, or in EPA lingo, “unclassified non-attainment areas”) for showing continued attainment or transportation conformity in our redesignation request.

In addition to all the other work the Department and DEQ have completed, we need to be able to show “verification of continued attainment of the standards” and we need to establish a CO budget for transportation conformity purposes. DEQ finished the 2000 CO Emission Inventory in June 2003, which the EPA is currently reviewing. As soon as the EPA approves the methods used in the inventory, DEQ can use that document to project future CO emissions in five-year intervals (2005, 2010 and 2015.) Once the DEQ finishes that work, we will use the projected 2015 emissions to establish a CO budget for transportation in the non-attainment area. That budget will be used for future Transportation Plan Updates, to ensure that Missoula will meet the federal CO standard well into the future. The projections also serve as a basis for Missoula to show continued attainment of the standard during the maintenance period.

At this point, I do not have a good estimate of how much time this additional work will take. I will keep you updated on the progress.