



MEMORANDUM

TO: The Missoula City-County Air Pollution Control Board
FROM: Shannon Therriault, Air Quality Specialist
DATE: January 12, 2001
RE: Redesignation

The Health Department continues to work toward redesignation from a non-attainment area to a maintenance area for carbon monoxide and particulate. This memo is intended to give you a brief history of the non-attainment designation, as well as a general idea of the process Missoula must complete to be redesignated.

Missoula has had a history of violating the federal particulate and carbon monoxide (CO) standards. The first recorded violations were in 1969 for particulate and 1977 for carbon monoxide. Once designated as a non-attainment area by the EPA, the department had to write State Implementation Plans (known as SIPs) detailing how Missoula would attain and then maintain pollution levels below the federal standards.

Thanks to fleet improvements, the introduction of oxyfuels in the winter, and various woodstove programs, Missoula has not exceeded the federal CO standard since the spring of 1992. Particulate pollution has also decreased - Missoula has gone from one of the worst non-attainment areas in the county to complying with the federal regulations - in large part due to the woodstove removal program, source improvements and street paving and maintenance regulations. Other than the violations Missoula recorded as a result of last summer's wildfires, Missoula has not violated the federal standard for PM₁₀ since 1989. (The EPA "excuses" violations that are caused by wildfires, so they don't affect our ability to apply for redesignation.)

Because Missoula is no longer violating the standards, we can pursue redesignation to a "maintenance" area for carbon monoxide and particulate. It is important to understand that changing designations does not mean Missoula will not have to work to keep its air clean. We must keep controls in place that assure EPA that Missoula will not once again start violating the federal standards. In addition, in order to make the air as healthy as possible, the Health Department will continue to design and implement programs aimed at reducing air pollution in the Missoula Valley.

Redesignation requires several steps and the process for carbon monoxide and particulate is essentially the same. The department is currently working on both. The process is akin to writing a SIP (not an easy task!) These are the criteria we must address:

1. Missoula must show it is meeting the federal standards with several years of monitoring data. Additional dispersion modeling may be required.
2. Missoula must have an approved SIP. The recent rule rewrite is part of this process, as are the recently completed 1993 and 1996 CO Emission Inventories. A 1999 CO Emission Inventory must be completed by the Department of Environmental Quality (unfortunately, that position has been vacant for over 6 months at the state.)
3. Missoula must show improvements are permanent and not due to favorable meteorology.
4. Missoula must show it satisfies Clean Air Act requirements. Again, the rule rewrite was necessary for this section.
5. Missoula must have a fully approved maintenance plan, which includes an emissions inventory, maintenance demonstration, monitoring to verify we continue to meet the standards and a contingency plan if we violate the standards.

Our goal is to complete this process by 2002. We are currently writing a detailed work plan and coordinating with the Department of Environmental Quality. I have been designated as the lead for the CO redesignation project, and Benjamin Schmidt is the lead of the particulate redesignation project.