



Redesignation Update

MEMO

TO: Interested Parties
FROM: Shannon Therriault, Air Quality Specialist
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The Health Department continues to work toward redesignation from a non-attainment area to a maintenance area for carbon monoxide and particulate. Unfortunately, staffing problems at the Department of Environmental Quality have delayed completion of the necessary carbon monoxide and particulate emission inventories. We originally thought both documents would be completed by late spring 2002. Now, it appears that the CO emission inventory will be finished by the end of January 2003 and the PM₁₀ emission inventory will be completed by April 2003.

Even without the inventories, the Health Department is doing what it can to keep the process moving. We have completed the first draft of the “Missoula County Carbon Monoxide Redesignation Plan” and have released it for informal agency review. This document will soon be available at the department’s website: www.co.missoula.mt.us/EnvHealth. A formal public comment period will follow, after the emission inventory and modeling are completed.

Background. 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 violate the federal standards once again. 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.

Why Redesignate? It is true that redesignation takes a lot of resources, and there is nothing in either the federal or state Clean Air Acts that requires Missoula to request to be redesignated from attainment to “maintenance.” But redesignating is important for a variety of reasons:

1. It takes away what some people see as a stigma of being called a “dirty air town.”
2. It celebrates the tremendous success Missoula has had in cleaning up our air.
3. It eases some regulatory obligations for industry.

The Requirements. Redesignation requires several steps and the process for carbon monoxide and particulate is essentially the same. The department is currently working on both. These are the criteria we must address:

1. Missoula must show it is meeting the federal standards with several years of monitoring data.
2. Missoula must have an approved SIP. The 2000 rule rewrite was part of this process, as are the recently completed 1993 and 1996 CO Emission Inventories. A 2000 PM₁₀ and 2000 CO Emission Inventory must be completed by the Department of Environmental Quality (At this point, DEQ believes the CO inventory will be completed by the end of January and the PM₁₀ inventory will be completed by April.)
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, verification monitoring, a control plan, a contingency plan if we violate the standards and a clear process for transportation conformity.

The Process. The Health Department is drafting the redesignation requests, which must include all the requirements listed above. The Montana Department of Environmental Quality is completing the necessary emission inventories and modeling. DEQ expects to complete the CO inventory and modeling by the end of January 2003. DEQ expects to be done with the PM₁₀ emission inventory by April 2003.

The Health Department has finished the first draft of the CO request, with the exception of the emission inventory and modeling. The draft is out for Advisory Council and agency review. This request will go through a formal public review process once the inventory and modeling are completed.

The Health Department is also working on the PM₁₀ redesignation request. The department is concerned that growth (especially in vehicle miles traveled) could cause Missoula to violate the

PM₁₀ standards in the future. As a result, the department is proposing to include budgets for each type of air pollution source so that one sector (like transportation) doesn't use up all the gains made in other areas (like woodstove smoke and industrial emissions.) The Department is currently compiling information from ambient data, past emission inventories and previous air pollution studies needed to recommend specific budgets that will allow for growth, while protecting air quality, in a way that is fair to all sources.

Once the department gathers the needed information, it will hold discussions with the Air Quality Advisory Council, the Transportation Technical Advisory Committee, the Transportation Planning Coordinating Committee, industrial and commercial sources, and other interested groups.

As with all air quality rules, the redesignation requests will go through a public comment period, public notice, and a public hearing in front of the Air Pollution Control Board. Once the Board approves the requests, the Missoula City Council and the Missoula County Commissioners will be asked for their concurrence. These entities also have public notice and public hearing procedures. When all three local bodies have approved the redesignation requests, they will go to the Board of Environmental Review for another hearing, before being given to the Governor. The Governor sends the request to EPA, after which the EPA has six months to determine if the submittal is complete and an additional 12 months to approve or deny the request. Once approved, the maintenance plan becomes part of the State Implementation Plan and is federally enforceable.