



# MEMORANDUM

**TO:** Air Pollution Control Board  
**FROM:** Jan Scher, M.S.  
 Air Quality Specialist  
**DATE:** May 11, 2006  
**SUBJECT:** PM<sub>10</sub> Maintenance Plan and Redesignation Status

As you are aware, the department has been working on the documents needed to request redesignation from a “nonattainment” area to a “maintenance” area for PM<sub>10</sub> (particulate matter less than 10 microns in diameter). At your next meeting, staff will update you about some developments with regard to the National Ambient Air Quality Standards (“standards”) and ask for your direction about the department’s redesignation efforts.

In January 2006, EPA proposed new standards for particulate matter. The proposal would make the daily PM<sub>2.5</sub> standard more stringent, keep the annual PM<sub>2.5</sub> standard the same, create a daily standard for PM<sub>10-2.5</sub>, and eliminate both the annual and daily standards for PM<sub>10</sub>. The following table summarizes the proposed changes:

Pollutant		Current Standard	Proposed Standard ---µg/m <sup>3</sup> ---	Missoula’s Data
PM <sub>10</sub>	Daily	150	n/a	~80-110
	Annual	50	n/a	~18-22
PM <sub>2.5</sub>	Daily	65	35	~46
	Annual	15	15	~11
PM <sub>10-2.5</sub>	Daily	n/a	70	?
	Annual	n/a	n/a	n/a

According to the proposal, EPA will issue the final standards by September 27, 2006, and the new standards will take effect on November 27, 2006. When the new standards are implemented, the PM<sub>10</sub> standard will no longer apply. As a result, the Missoula area’s nonattainment status for PM<sub>10</sub> will eventually disappear, whether or not we have submitted a maintenance plan and redesignation request.

As shown in the previous table, recent monitoring data indicates that Missoula will probably not be in compliance with the proposed daily PM<sub>2.5</sub> standard and therefore Missoula will probably be

designated as nonattainment for PM<sub>2.5</sub> under the new standards. As a nonattainment area, we would be required to submit a State Implementation Plan for PM<sub>2.5</sub> describing our strategy for bringing the area into attainment of the standards. Even if Missoula is not designated as a nonattainment area, our monitoring data shows that our PM<sub>2.5</sub> levels are close enough to the standards to warrant action to prevent violations in the future. Regardless of our designation under the new standards, it will be important for the department to take steps to address PM<sub>2.5</sub> in our area.

Although EPA has not yet established policy regarding the implementation of the new standards, it is our understanding that when the revised standards take effect, our PM<sub>10</sub> State Implementation Plan (SIP) probably will remain in place as a federally enforceable plan until the state recommends changes. We also understand that our PM<sub>10</sub> transportation conformity budget—which is separate from the SIP—will no longer apply. (You may recall that one of the key elements we proposed for our PM<sub>10</sub> maintenance plan was expanding the maintenance area to the Air Stagnation Zone boundary and establishing a transportation conformity budget for that entire area.) As a reminder, our state and local air regulations would remain in place.

EPA has up to 18 months to consider redesignation requests. Even if we were able to get a request into them in the next few months, it is unlikely that EPA would act on it until the new standard has been finalized. If the standard is adopted as planned, and the PM<sub>10</sub> standard is abandoned, there would be no reason for EPA to act on it at all. In fact, EPA has recommended that we put our redesignation efforts on hold at least until the fall, when more will be known about the implementation of a new 2.5 standard and the abandonment of the PM<sub>10</sub> standard.

In summary, it appears that additional efforts toward PM<sub>10</sub> redesignation essentially will be rendered moot upon implementation of the new particulate standards. It also appears that we will need to address PM<sub>2.5</sub> emissions either to attain or maintain compliance with the new standards. In light of this information, staff wanted to ask the board to consider whether or not PM<sub>10</sub> redesignation should continue to be a priority project for the department. At your upcoming meeting, we will request your direction in this regard.