

OFFICE OF THE GOVERNOR  
STATE OF MONTANA

STEVE BULLOCK  
GOVERNOR



MIKE COONEY  
LT. GOVERNOR

September 21, 2016

Shaun McGrath  
Regional Administrator, EPA  
Region VIII, 8P-AR  
1595 Wynkoop Street  
Denver, Colorado 80202-1129

**RE: Montana State Implementation Plan Actions**

Dear Mr. McGrath:

For your consideration, this submittal contains proposed actions regarding the Montana State Implementation Plan (SIP). The Montana Department of Environmental Quality (Department) has worked closely with the Environmental Protection Agency (EPA) Region 8 staff in the development of the proposed SIP actions.

The actions requiring consideration are:

1. Montana 2015 Revised 8-hour Ozone NAAQS Initial Designations
2. Revision of Prevention of Significant Deterioration (PSD) Permitting Provisions

Montana 2015 Revised 8-hour Ozone NAAQS Initial Designations

The EPA promulgated revisions to the National Ambient Air Quality Standards (NAAQS) for ozone on October 1, 2015, with the revision published in the Federal Register (FR) on October 26, 2015 at 80 FR 65291. According to 42 USC §7407, Congress directs Governors to submit a list of areas designated as “nonattainment,” “attainment,” or “unclassifiable” with respect to a new or revised NAAQS. Such lists of designated areas are due no later than one year following the promulgation of a new or revised standard, or October 1, 2016.

Montana hereby designates all 56 counties in the state “unclassifiable” or “attainment” for the 2015 revised 8-hour ozone NAAQS. The information provided in the enclosed Technical Support Document outlines Montana’s rationale for these designations.

Revision of Prevention of Significant Deterioration (PSD) Permitting Provisions

With this submittal, Montana is removing the phrase "24-hour average" from the significant monitoring concentration (SMC) for particulate matter with a diameter of less than 2.5 microns (PM-2.5). In a letter to the EPA dated November 30, 2015, Montana committed to revising the Administrative Rules of Montana (ARM) 17.8.818, Review of Major Stationary Sources and Major Modifications - Source Applicability and Exemptions in order to ensure our rules remain as stringent as federal statute.

Both of these actions included for approval into the SIP were noticed for a 30-day public comment period. No comments were received.

If you have any questions regarding this action, please contact Liz Ulrich, the Montana Department of Environmental Quality's Analysis and Planning Services Section Supervisor, by telephone at (406) 444-9741 or by email at [eulrich2@mt.gov](mailto:eulrich2@mt.gov).

Sincerely,



STEVE BULLOCK  
Governor

cc: Monica Morales, Acting Air Program Director, USEPA Region 8  
Jaslyn Dobrahner, USEPA Region 8  
Tom Livers, Director, Montana Department of Environmental Quality  
David L. Klemp, Air Quality Bureau Chief, Montana Department of Environmental Quality

**TECHNICAL SUPPORT DOCUMENT**  
**Montana Initial Designations**  
**2015 Revised 8-hour Ozone National Ambient Air Quality Standards**

**I. EXECUTIVE SUMMARY**

On October 1, 2015, EPA revised the National Ambient Air Quality Standards (NAAQS) for ozone (O<sub>3</sub>), revising the annual primary (health-based) and secondary (welfare-based) standards from 75 parts per billion (ppb) to 70 ppb expressed as the 3-year average of the 4<sup>th</sup> highest daily maximum 8-hr concentration. The revision was published in the Federal Register (FR) on October 26, 2015 at 80 FR 65291.

According to 42 USC §7407, *et seq.*, Montana must submit to EPA an initial list of geographic areas that attain the standard, do not attain the standard, or are otherwise unclassifiable based on available information. Montana hereby designates all areas (Counties) within the state as “attainment” or “unclassifiable” for the 2015 revised O<sub>3</sub> NAAQS. The following evaluation substantiates Montana’s area designations.

Designations for Counties

Based on available information, Montana determined that an initial designation of “attainment” is appropriate for 7 Montana counties with active O<sub>3</sub> State or Local Air Monitoring Stations (SLAMS) and 1 Montana county with an active O<sub>3</sub> Federal Monitoring Station located within their respective boundaries for the design value period of 2013 through 2015. Available monitoring data collected at the SLAMS supports a conclusion that ambient concentrations of O<sub>3</sub> in those counties are in compliance and therefore attain the 2015 revised annual O<sub>3</sub> NAAQS.

The counties to be designated “attainment” include: Fergus, Missoula, Lewis and Clark, Flathead, Powder River, Phillips, Rosebud and Richland.

The remaining 48 counties in Montana should be designated as “attainment” or “unclassifiable” due to a lack of appropriate and/or adequate monitoring data to determine NAAQS compliance.

**II. MONITORING DATA**

The State of Montana operates 7 O<sub>3</sub> SLAMS and the National Park Service operates 1 O<sub>3</sub> monitor. Figure 1 shows the location of all O<sub>3</sub> monitors in the state. SLAMS use only Federal Reference Methods (FRM) or Federal Equivalent Methods (FEM) and therefore provide data suitable for NAAQS compliance comparisons.

Figure 1. Montana O<sub>3</sub> Monitors



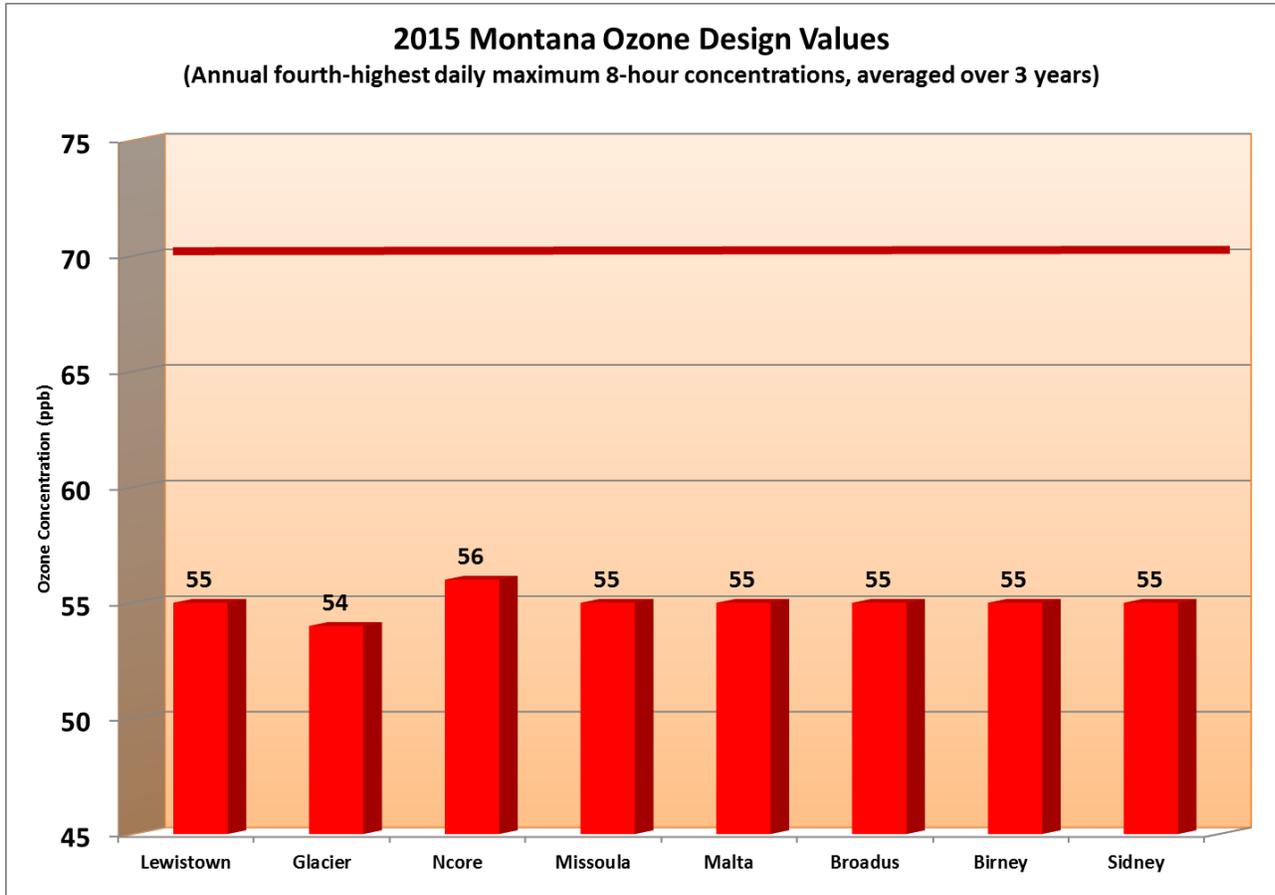
Table 1 provides monitoring site locations within their respective county for all O<sub>3</sub> monitors within the state.

Table 1. Montana’s O<sub>3</sub> Monitoring Network

Site	Location
30-063-0024	Missoula – Boyd Park (Missoula Co.)
30-049-0004	NCore – (Lewis & Clark Co.)
30-027-0006	Lewistown - (Fergus Co.)
30-071-0010	Malta – (Phillips Co.)
30-083-0001	Sidney - (Richland Co.)
30-087-0001	Birney – (Rosebud Co.)
30-075-0001	Broadus - (Powder River Co.)
30-029-8001	Glacier National Park - (Flathead Co.)

Figure 2 shows the calculated design values for all 18 monitors in the state for the design value period of 2013-2015. Montana has not had any ozone related exceptional events.

Figure 2. Annual O<sub>3</sub> 3-Year Average of Annual Mean at All Monitors



### III. Conclusion

According to 42 USC §7407, Montana is required to submit to EPA a list of all areas (or portions thereof) in the state, designating as “nonattainment”, “attainment”, or otherwise “unclassifiable” based on available information. Through implementation of a robust O<sub>3</sub> ambient air quality monitoring network the state of Montana has presented a strong case supporting the initial designations listed below.

Based on available information, Montana determined that an initial designation of “attainment” is appropriate for 7 counties with active O<sub>3</sub> SLAMS and 1 Montana county with an active O<sub>3</sub> Federal Monitoring Station located within their respective boundaries for the design value period of 2013 through 2015. Available monitoring data collected at the SLAMS supports a conclusion that ambient concentrations of O<sub>3</sub> in those counties is in compliance and therefore attains the 2015 revised annual O<sub>3</sub> NAAQS.

Those counties to be designated “attainment” include: Fergus, Missoula, Lewis and Clark, Flathead, Powder River, Phillips, Rosebud and Richland.

The remaining 48 counties in Montana should be designated as “attainment” or “unclassifiable” due to a lack of appropriate and/or adequate monitoring data to determine NAAQS compliance.

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
NOTICE FOR PUBLIC HEARING**

- 1) The Department of Environmental Quality (DEQ) is inviting public comment on the submission of initial Ozone designations for the 2015 Revised Ozone Standard to the U.S. Environmental Protection Agency (EPA).
- 2) The document proposed to be submitted is the *Montana Initial Designations – 2015 Revised 8-hour Ozone National Ambient Air Quality Standards*. A formal request will be submitted to the EPA by the state of Montana supporting that based on available information obtained from Montana’s state-wide ozone ambient air quality monitoring network we have determined that an initial designation of “attainment” is appropriate for 8 Montana counties containing ozone monitors suitable for NAAQS compliance comparisons. Monitoring data collected at these sites supports a conclusion that ambient concentrations of ozone in those counties is in compliance, and therefore attains, the 2015 revised 8-hour ozone NAAQS. Those counties to be designated “attainment” include: Fergus, Missoula, Lewis and Clark, Flathead, Powder River, Phillips, Rosebud and Richland. The remaining 48 counties in Montana should be designated as “attainment” or “unclassifiable” due to a lack of adequate monitoring data to determine NAAQS compliance.
- 3) DEQ will be accepting public comment regarding the proposal to submit the above-described document to EPA for 30 days. **The public comment period begins on August 1, 2016, and ends on August 30, 2016, at 5:00 p.m.**
- 4) Any person may request public hearing on this matter. If DEQ receives a request for public hearing, a public hearing on this matter will be scheduled and the time for that hearing will be announced.
- 5) Interested persons may view the document on DEQ’s website at: <http://deq.mt.gov/Public/publiccomment> or may call DEQ at 406-444-1472 to have copies made available for their inspection.
- 6) The state of Montana makes reasonable accommodations for any known disability that may interfere with a person’s ability to participate in state government proceedings. Persons requiring accommodation need to contact Lisa Peterson concerning the nature of the accommodation. Please contact Lisa at P.O. Box 200901, Helena, Montana 59620-0901; phone 406-444-2929; fax at 406-444-1499; or email [lpeterson@mt.gov](mailto:lpeterson@mt.gov).
- 7) Interested parties may submit their comments concerning the proposal described above in writing to the Department by
  - addressing them to Stephen Coe, Air Resources Management Bureau, 1520 E Sixth Avenue, P.O. Box 200901, Helena, Montana, 59620-0901;
  - faxing them to 406-444-1499; or
  - sending them via email addressed to [scoe@mt.gov](mailto:scoe@mt.gov).

To be guaranteed consideration, written comments must be postmarked on or before 5 p.m. August 30, 2016.



August 1, 2016

Interested Parties:

The Department of Environmental Quality (DEQ) is inviting public comment on the submission of initial Ozone designations for the 2015 Revised Ozone Standard to the U.S. Environmental Protection Agency (EPA).

Interested persons may view the document on DEQ's website at: <http://deq.mt.gov/Public/publiccomment>

Interested parties may submit their comments concerning the proposal described above in writing to the Department by addressing them to:

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Helena, Montana, 59620-0901;

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## Public Comment Periods

By Subject or Program:

- Air Quality Permits
- Draft TMDL Reports
- Water Quality Discharge Permits
- Nutrient Management Plans
- Coal and Uranium Program
- Opencut Permits. Enter County, site name and/or contractor to navigate to page.

The documents listed in the links above may not be included in the list below.

The DEQ Public Comment Site shows major programs open for comment with instructions on how to enter comments and attachments.

Subject	Comments Period	Board/Rule/Resolution	Contact Information
This is a notice and request for public comment on the submittal of amended Administrative Rule of Montana (ARM) 17.8.818 to the Environmental Protection Agency for inclusion in the Montana State Implementation Plan (SIP). The Board of Environmental Review amended the subject rule on August 5, 2016.	To be guaranteed consideration, written comments must be postmarked on or before 5:00 p.m. on Monday, September 12, 2016.	PM 2.5 Significant Monitoring Concentration (SMC)  MAR Notice No. 17-383	Montana Department of Environmental Quality-Air Quality Bureau  Attn: Liz Ulrich PO Box 200901 Helena, MT 59620 Fax: 406-444-1499
The Department of Environmental Quality (DEQ) is inviting public comment on the submission of initial Ozone designations for the 2015 Revised Ozone Standard to the U.S. Environmental Protection Agency (EPA).  SIP Notice  Technical Support Document	To be guaranteed consideration, written comments must be postmarked on or before 5:00 p.m. August 30, 2016	Montana Department of Environmental Quality Air Quality Bureau 1520 E. 6th Avenue Helena, MT 59601	Montana Department of Environmental Quality Air Quality Bureau PO Box 200901 Helena, MT 59620  or electronically to: scoe@mt.gov