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STATE OF MONTANA

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Steve  
OPRA -

BRIAN SCHWEITZER  
GOVERNOR



JOHN BOHLINGER  
LT. GOVERNOR

February 24, 2009

Carol Rushin  
Acting Regional Administrator  
United States Environmental Protection Agency  
Region VIII, 8P-AR  
1595 Wynkoop St.  
Denver, CO 80202-1129

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USEPA RA'S OFFICE

Dear Ms. Rushin:

Thank you for your December 11, 2008, letter and guidance regarding the process for designating areas under the March 12, 2008, revised National Ambient Air Quality Standard (NAAQS) for ozone. According to 42 USC §7407, governors are required to submit a list of areas designated as nonattainment, attainment, or unclassifiable with respect to the new or revised NAAQS. Such lists of designated areas would be due no later than one year following the promulgation of a new or revised standard, or March 12, 2009, as set forth in your letter. Montana designates all areas of the state as attainment or unclassifiable for the revised ozone NAAQS.

Ozone is not a pollutant of concern in Montana. We conclude this because Montana researched and continues to research ozone in both urban and rural areas throughout the state. The enclosed technical memorandum and associated attachments outline Montana's ozone monitoring strategies and findings to date.

Again, thank you for the opportunity to address Montana's compliance status with the revised ozone standard. Should you have any questions regarding this action, please contact M. Eric Merchant, the Department's Air Quality Policy and Planning Supervisor, by telephone at (406) 444-1457 or by email at [emerchant@mt.gov](mailto:emerchant@mt.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Schweitzer".  
BRIAN SCHWEITZER  
Governor

c: Richard Opper, Director, Department of Environmental Quality  
Dave Klemp, Chief, Air Resources Management Bureau  
M. Eric Merchant, Air Resources Management Bureau  
enclosure

# Technical Memorandum

## State of Montana – Ozone Monitoring Strategy and Findings

In accordance with the requirements of 40 CFR 58, Appendix D.4, the design criteria used to evaluate area compliance with the revised National Ambient Air Quality Standard (NAAQS) for ozone is dependent on "... area size (in terms of population and geographic characteristics) and typical peak concentrations (expressed in percentage below or near the O<sub>3</sub> NAAQS)". The following table copied from Table D-2 of Appendix D to 40 CFR Part 58 outlines the minimum ozone monitoring requirements:

SLAMS Minimum O <sub>3</sub> Monitoring Requirements		
MSA population <sup>1,2</sup>	Most recent 3-year design value concentrations $\geq 85\%$ of any O <sub>3</sub> NAAQS <sup>3</sup>	Most recent 3-year design value concentrations $< 85\%$ of any O <sub>3</sub> NAAQS <sup>3,4</sup>
> 10 million	4	2
4 – 10 million	3	1
350,000 – <4 million	2	1
50,000 – <350,000 <sup>5</sup>	1	0

<sup>1</sup> Minimum monitoring requirements apply to the metropolitan statistical area (MSA)  
<sup>2</sup> Population based on latest available census figures  
<sup>3</sup> The ozone (O<sub>3</sub>) National Ambient Air Quality Standards (NAAQS) levels and forms are defined in 40 CFR Part 50  
<sup>4</sup> These minimum monitoring requirements apply in the absence of a design value  
<sup>5</sup> MSA must contain an urbanized area of 50,000 or more population

Montana has three MSAs with populations between 50,000 and 350,000. These MSAs include Billings, Missoula, and Great Falls. For the purpose of evaluating compliance with the ozone NAAQS, Montana conducted three years of ozone season monitoring (June-September) in the Billings area (Shepherd Barn site) and two years of ozone season monitoring in the Missoula area (Frenchtown site). Using professional judgment and based on factors including, but not limited to, population density, area-wide vehicle miles traveled, and existing industrial activity (including oil and gas industry development), Montana determined these locations represent the MSAs in Montana with the highest potential for ozone formation. The design value for the Billings area was determined during 2005-2007 to be 0.059 ppm or 78.7% of the revised ozone NAAQS. Measurements made in the Missoula MSA indicated an even lower design value. No basis exists to indicate ozone is a concern in Great Falls; therefore no measurements of ozone have been made.

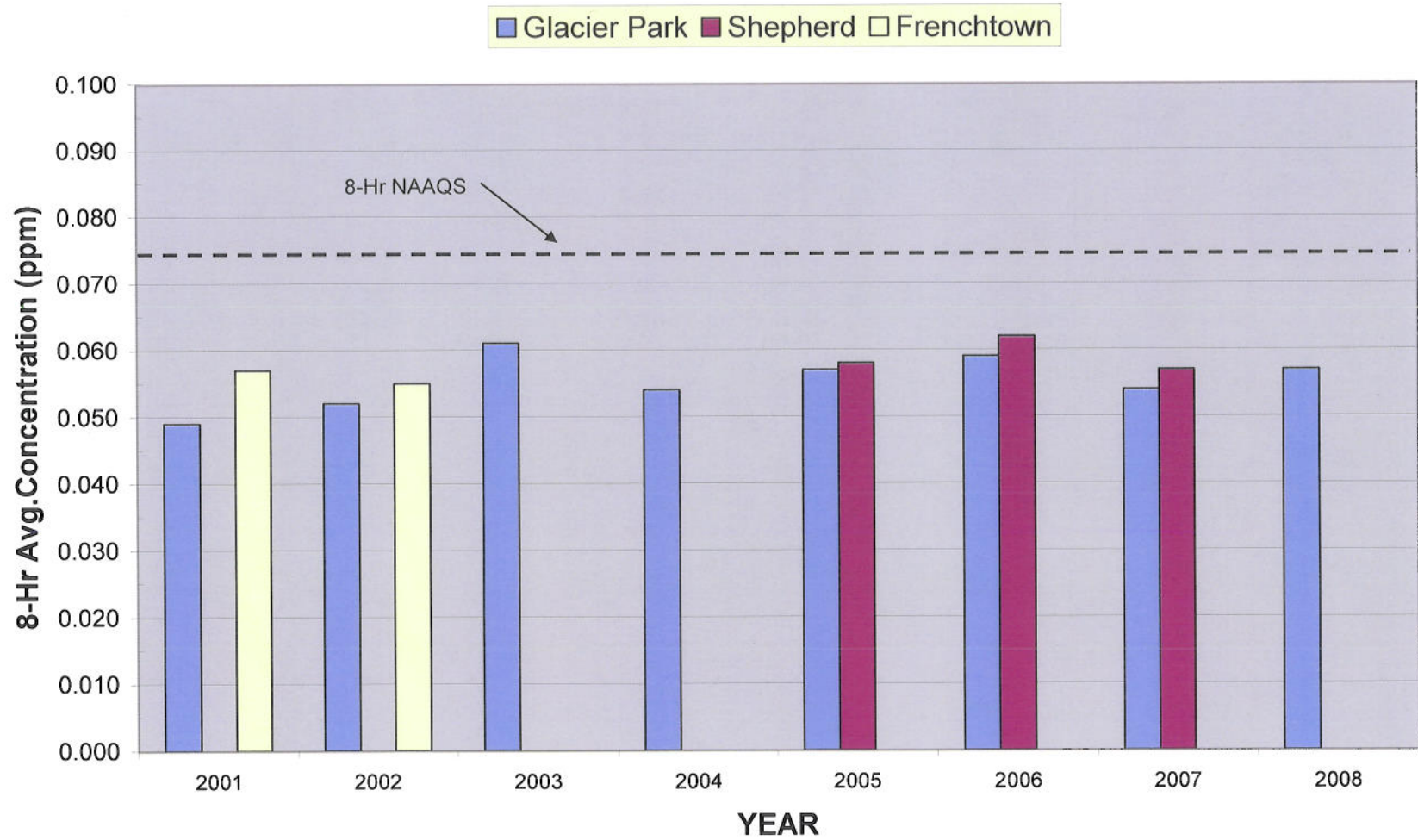
Further, rural ozone monitoring currently occurs in Glacier National Park and near Sidney in eastern Montana. Glacier National Park data from 2001 through 2008 shows continued attainment with the revised ozone standard. The Sidney special purposes monitor was located due to proximity to oil and gas industry development activities. Monitoring began at the Sidney site in October, 2008,

and initial data shows attainment with the revised ozone NAAQS. Montana intends to maintain current ozone monitoring activities and implement the required NCore monitoring activities, including ozone monitoring, by January 1, 2011.

The available data from all ongoing and past ozone monitoring activities in Montana demonstrates no violations of the revised ozone NAAQS have occurred or would be reasonably anticipated to occur statewide. Available monitoring data compared to the revised ozone NAAQS is shown in **Attachment 1**. In addition, unlike the 4<sup>th</sup> highest 8-hour average concentration demonstrating compliance with the revised ozone NAAQS, **Attachment 2** shows the highest 1-hour maximum concentration monitored at each respective site. This data clearly demonstrates compliance with the applicable 1-hour Montana Ambient Air Quality Standard (MAAQS) and provides further evidence that ozone is not currently a problem in Montana. Montana continues to closely examine available data and make other, relevant observations to ensure no circumstances arise which may cause concern regarding ozone NAAQS attainment.

# ATTACHMENT 1

## 2001-08 O3 Review 4th Max 8-Hr



# ATTACHMENT 2

## 2001-08 O3 Review Max 1-Hr

